

Date September 5, 1972 Letter No.

To J.W. Armstrong

From C.E. Wasmuth, Jr.

Subject Asbestos Labeling Requirements

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J. W. ARMSTRONG

This is in response to your memorandum of August '31 requesting advice as to whether we have a legal obligation to label cartons containing our brake lining materials as containing asbestos.

The regulations now in effect provide in relevant part that caution labels will be placed on containers holding products containing asbestos fibers unless the asbestos fibers "have been modified by a bonding agent. . . or other material so that during any reasonable foreseeable use, handling, storage, disposal, processing, or transportation, an airborne concentration of asbestos fibers in excess of" five fibers longer than five micrometers per cubic centimeter of air will be released.

With specific reference to brake linings sold by the Friction Materials Division, it is my understanding that the asbestos fibers are modified by bonding agents. However, I do not know whether during "any reasonably foreseeable use" or handling the brake linings might give off asbestos fibers above the specified limit. If there is a significant probability that this would happen I would recommend that labels required by the regulation be placed on the containers. This label is required to state:

CAUTION

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust May Cause

Serious Bodily Harm

It must be printed in letters of sufficient size and contrast so that it is readily visible and legible.

CEW:ms

*Carl E. Wasmuth Jr.*