GHQ
July 29, 1970

JUL 31 '70
OFFICE OF THE GENERAL COUNSEL

J. A. Krochta - Manville

CAUTION LABELS FOR UNTREATED ASBESTOS PRODUCTS
E. J. DOMANICK'S LETTER 7/15/70

I recently discussed this matter with M. J. Cowan, and it is my opinion that a determination of products to be labeled should be made by composition, appearance, use and possible misuse of the product, rather than by dust counts simulating installation.

Labeling serves the purpose of alerting the user of the product to the potential harmful effects, plus providing a degree of legal protection to the manufacturer.

Unless specific instructions, step by step, are to be included with each product as to its use, the fact that Industrial Hygiene tests indicate dust concentrations below the threshold limit value upon simulated installation would be of little or no value.

I suggested to Mr. Cowan, therefore, that the decision to label or not to label should be made on the basis of observation of the product, and a thorough analysis of its use.

Attached to Mr. Domanick's letter of 7/15 was a sample caution label apparently proposed for group of products identified in the letter. The wording of the label is good, however, the layout is not acceptable. Also, the word "Pneumoconiosis" is misspelled. If you will have the person responsible for the layout contact me, I will review it with him and provide recommendations for revision.

The sample caution label attached to Mr. Domanick's letter of 7/15/70 specifically identifies the harmful dust as "Crocidolite Asbestos". If the product group listed in the letter contains other than "Crocidolite Asbestos", the wording must be changed to identify the proper type of materials. If the product contains only "Chrysotile Asbestos" rather than "Crocidolite", I recommend that we drop the words "harmful dust" and, as applied with other Chrysotile Asbestos products, merely head the label with the word "Caution".

CLS.
C. L. Sheckler

See note on Domanick memo of 7/15/70

cc: H. B. Moreno
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CLS:mw