FILE NAME: Allied Signal Bendix (ASB)

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FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE #4, PARAMUS, N.J. 07652

November 6, 1972

TO: Delegates & Alternates
Asbestos Study Committee

SUBJECT: Interpretation of OSHA Labeling Requirements

The Chairman of the Asbestos Study Committee is requesting a survey of members on their interpretation of the labeling requirements for asbestos type brake lining and clutch facing shipments.

On June 20, 1972, the Institute distributed to all members a copy of the OSHA Standards for exposure to asbestos dust. A key paragraph in the standards had to do with labeling requirements:

> (2) Caution labels--(i) Labeling. Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

The problem, in this case, is the shipment of asbestos containing brake linings or clutch facings where in many cases subsequent operations will be performed--cutting, grooving, drilling, and grinding. The Chairman indicates that these subsequent operations can produce airborne concentrations of asbestos fibers in excess of the current exposure limits (5 fibers/cc TWA, or 10 fibers/cc ceiling).

The questions are:

1. Do you now label asbestos type friction materials with the label as specified in the OSHA Standards?
   1.1 For replacement market shipments?
   1.2 For original equipment shipments?

2. Do you plan to label asbestos type friction materials with this label?
   2.1 For replacement market shipments?
   2.1 For original equipment shipments?

3. Do you interpret the OSHA Regulations on labeling to require a manufacturer to label asbestos type friction materials where subsequent operations (drilling, grinding, etc.) are likely to be performed?

Would you please complete this--or have it done by the individual responsible for implementation of the OSHA Standards--and return to me at the Institute Office.

E. W. Drislane
Executive Director

FMSI--0135

FMSI 02808

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OSHA LABELING REQUIREMENTS

	Yes	No
1. Current Labeling Practice		
1.1 For replacement market friction material shipments, we now provide the OSHA caution label.	( )	( )
1.2 For original equipment friction material shipments, we now provide the OSHA caution label.	( )	( )
2. Planned Labeling Practice		
2.1 For replacement market friction material shipments, we plan to use the OSHA caution label.	( )	( )
2.2 For original equipment friction material shipments, we plan to provide the OSHA caution label.	( )	( )
3. Interpretation of OSHA Labeling Regulations		
3.1 We interpret the OSHA labeling regulations to require caution labels on friction material shipments that will have subsequent working (drilling, grinding, etc.).	( )	( )

BY_____

COMPANY_____

DATE_____

FMSI 02809