

LABELING PRACTICES

There are 3 areas for concern on labeling. One is the handling of the loose asbestos fiber from the point where it is received to the point where it is mixed and briquetted. The next is the handling of the products with supposedly locked-in asbestos during subsequent operations, such as drilling, grinding, inspection and boxing. The last concerns the handling of the brake lining or clutch facing by the customer where he may also do some drilling or grinding before the lined assembly is a finished product.

It was reported during this topic that there was a higher concentration of asbestos in the air in the Inspection Department than most members had realized. One member indicated that when pallets of brake linings were shipped there apparently is additional dust created during transportation. The question of surface dust on the working surface of a brake lining or a clutch facing was discussed. Where members have taken action to reduce the dusty type surface, they have found that they have actually altered the frictional characteristics of the material during the early miles on a vehicle. In other words, the brakes are not very responsive during the early mileage after relines.

In the AIA recommendations, it is suggested that where a manufacturer is shipping his brake linings or clutch facings (locked-in-asbestos products) he should notify the user of his product to the effect, "Power bench saws without collectors should not be used in cutting this product. If this is impractical, operators should be provided with a Bureau of Mines approved respirator." It was suggested that a notification be put in boxes of brake linings or clutch facings being shipped to customers. A sample of the caution labels suggested is attached to these minutes. Mr. Feierabend indicated that this recommendation would not be accepted warmly by many manufacturers. Mr. Wagner objected to the recommendation that warning notices be put in the brake linings as he felt it was another "red flag" that would bring more harm to the industry than the alleged good that would come from enclosing such notices. Several members have had customers call in to their Sales Departments asking if the handling of locked-in-asbestos in brake linings and clutch facings is a hazardous condition. Another asked if this notification was a requirement of the OSHA regulations. It was indicated that this was not specifically required by the OSHA regulations. The concern is, do those customers doing additional grinding and drilling of the brake linings or clutch facings create working conditions where the concentration of asbestos would be a hazard. Since small manufacturers are exempted from the OSHA regulations, they will probably not be running tests. Larger customers will, of course, be covered under the OSHA regulations and it is expected that tests will be run in these manufacturers' work areas. Whether the Institute would recommend such labeling in finished products shipped to the customers was not decided. It was felt that this subject should receive further consideration from the Members of the Committee before a recommendation is made. One member commented that there were instructions by some manufacturers advising that blowing out the wear debris from used brakes was not recommended.

This subject of recommending that brake lining and clutch facing manufacturers include a warning sheet in their shipments appears to be somewhat controversial and it is suggested that this matter receive some serious discussion by the Members of the Committee with those responsible at their companies. This item will most definitely be on an agenda for the next meeting of the Asbestos Study Committee.