still noticeable on a smaller package. One member was using an insert with a CAUTION label stuffed into the package. The use of imprinted CAUTION labels on the carton is desirable because it is essentially a one-time tooling cost. The use of separate labels is a continuing added direct expense. Most members now using separate gummed labels will eventually go over to imprinting the carton when ordered.

In what must be a response or a reaction by others, many customers are now asking Members about how much percentage of asbestos is in the brake linings. This could be a reaction on the customer's part as to whether they would have to put control practices in their factories because of the asbestos that is contained in brake lining. To meet the true spirit of the OSHA regulations, manufacturers doing subsequent drilling, grinding or cutting of asbestos containing brake linings should use the care that OSHA suggests.

One member felt that where he was shipping drilled ground lining sets that he would not have to imprint these small cartons with the OSHA CAUTION label. Other members are simply putting the OSHA CAUTION labeling on everything. When it was suggested that the Committee should take a position on this labeling requirement, the members of the Committee were referred back to the Resolution that was made on February 16, 1973. This Resolution said, in effect, that OSHA labeling practices should be adhered to where asbestos containing materials do not have asbestos fiber completely locked in or where subsequent operations may be performed. The question concerning the drilled and ground set is: While it is unlikely that subsequent operations will be performed, is it possible that they may be performed?

After a lengthy discussion it was decided that no resolution concerning recommended CAUTION labels would be proposed. Rather, the Secretary is directed to send to the Membership copies of typical labels now in use.

It was called to the Secretary's attention that his yellow Bulletin of March 30, 1973 was in error. In that notice it stated, "Avoid breathing dust". The wording should have been, "Avoid creating dust". This error will be called to the attention of the Membership.

The Chairman brought up another point as regards labels. There is a sign that can be posted in the factory where there are restrictions concerning asbestos dust in the atmosphere. This is a standard sign for placing in the factory which says: "CAUTION - Asbestos dust hazard; avoid breathing dust; wear assigned protective equipment; do not remain in area unless your work requires it; breathing asbestos dust may be hazardous to your health". Information on the availability of these signs will be sent to the Membership.

EPA EMISSIONS STANDARDS FOR ASBESTOS

While the new EPA emssions standards appear to be reasonable, there is some difficulty in interpretation. For example, the standards are not simply "No visible emssions", but (1) if the control equipment does not meet the air cleaning requirements in the regulations, no visible emissions are permissible, or (2) one could even have visible emissions if they were using a collector with the specifications recommended by the EPA. In other words, if you have the EPA's recommended collector you could possibly have visible emissions and still be complying with the EPA requirements. It goes without saying, that interpretation of the requirements by individuals in the different EPA regions may vary quite a bit.

... standards that the wet collector is not as efficient