

Johns-Manville

Internal Correspondence

To H. E. Konrad - 3-03

Date January 8, 1980

From E. M. Fenner - 1-06

Copies:

Subject: CAUTION LABELING - TRADE ASSOCIATION ACTIVITIES

The Asbestos Information Association/North America and the Mineral Insulation Manufacturers Association both have been actively involved with regulatory agencies in the development of caution labels for asbestos products and fiber glass insulation. Details of these activities are as follows:

Asbestos

In January 1972 the Occupational Safety and Health Administration published its proposed permanent standard for occupational exposure to asbestos dust. Their proposal included a requirement for caution labeling on all asbestos containing products. The label specified the wording "May Cause Asbestosis and Cancer".

A committee was formed from AIA/NA member companies and given an assignment to prepare an alternative label and labeling procedure for consideration by OSHA. This alternative, which limited the application of the label, and revised the wording, eliminating the phrase "May Cause Asbestosis and Cancer", was submitted as part of the AIA/NA commentary to OSHA on their proposed standard. The labeling recommendation was accepted and included in the final standard.

Fiber Glass

Recently, the Consumer Products Safety Commission asked the manufacturers of fiber glass home insulation to voluntarily label their products. The industry agreed to do so and the wording adopted by the manufacturers, although not identical in all cases, was coordinated through the efforts of the Mineral Insulation Manufacturers Association. The association represented the industry in discussions with CPSC.

Though the refractory industry is not under regulatory compulsion to label its silica-containing or other potentially hazardous products, I believe the industry should do so. A number of manufacturers, including Johns-Manville, Kaiser and others, are already voluntarily labeling their silica-containing products. While all the caution labels I have read convey the same message, they are not similar in wording.

I believe that this would be an opportunity for the Refractory Institute, which has formed a labeling committee, to develop and recommend to their members a label wording that could be used by all. If the industry does not do this voluntarily, we may be forced to do so by the soon to be proposed OSHA labeling regulations.

I'll be glad to discuss these comments with you.

E. N. Fenner

ENF:jh