Environmental Control Department
Research & Engineering Center
May 16, 1968

D. B. Wingerter - DHQ

Labeling of Insulation Products

You have provided me with a list of products indicating that the Product Managers are considering caution labels. The products include Super Brick, C-22 Brick, Fine and Coarse Sil-O-Cel powders, C-3 Aggregate and Marinite 23, 36, 65, MMM.

The suggested label will not be suitable for all products. Each product must be evaluated as to content and formula and then an appropriate label designed.

Products containing Celite materials should be labeled only if the material is calcined or flux calcined. Natural diatomaceous earth products are not currently labeled.

Sil-O-Cel Super Brick, C-22 Brick and Sil-O-Cel C-3 Aggregate are all calcined products. I recommend the following labeling for these products:

CAUTION! THIS PRODUCT CONTAINS SILICA

1. AVOID BREATHING THE DUST WHEN HANDLING THIS PRODUCT.
2. INHALATION OF SILICA DUST MAY BE HARMFUL.
3. IF VENTILATION CONTROL IS NOT ADEQUATE, WEAR U.S. BUREAU OF MINES APPROVED RESPIRATORY EQUIPMENT FOR PNEUMOCONIOSIS PRODUCING DUSTS.

My records indicate that Sil-O-Cel Insulation Powder is a natural diatomaceous powder and would therefore require no label. Your letter indicates "Fine and Coarse Sil-O-Cel Powders". These products require further identification before a specific recommendation can be made.

Marinites 23, 36, 65, Molten Metal, contain chrysotile and amosite asbestos fibre along with natural diatomaceous earth, hydrated lime and clay. The label therefore should be as follows:

CAUTION! THIS PRODUCT CONTAINS ASBESTOS FIBRE.

1. AVOID BREATHING THE DUST WHEN HANDLING THIS PRODUCT.
2. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER A LONG PERIOD OF TIME MAY BE HARMFUL.
3. IF VENTILATION CONTROL IS NOT ADEQUATE, WEAR U.S. BUREAU OF MINES APPROVED RESPIRATORY EQUIPMENT FOR PNEUMOCONIOSIS PRODUCING DUSTS.

Consistent with our labeling procedures with other products, I assume that International shipments will not be labeled.

The Caution Statement should be located prominently on the container and be printed in legible type in contrast by typography, layout or color with other printed matter on the container. Size of the label and letter size depend upon the size of the container. The size of the label must be such that it can be seen and read without difficulty. I am enclosing copies of asbestos product bag labels, carton labels and Celite product labels for the purpose of indicating letter size only.

Our J-M procedure for approval of labeling includes review by the Environmental Control, Industrial Relations and Legal Departments. By copy of this letter I am requesting H. M. Jackson and H. M. Ball to advise you of their opinions concerning this matter.

C L Sheckler

C. L. Sheckler

CLS/ems

Enc. (3)

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