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JM Johns-Manville

Internal Correspondence

To J. H. Swensen - 3-07

Date September 24, 1979

From E. D. Marcucci - 3-01

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A. C. Boush - 3-06
J. R. Cran - 3-01
H. Thomas - 3-06
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D. Markusson - 2-18

Subject LABELING TRANSITE PIPE

The results of our meeting with D. Markusson on September 20, 1979 were as follows:

1. Since we are firm in our conviction that installers will not be exposed to dangerous fiber levels if the recommended work practices are followed, we are better off not labeling TRANSITE pipe. Being without a label would be wiser than anything less than the full OSHA warning label.

2. Under Cal OSHA, if a product is formally "labeled", the installer must notify a state agency in writing before starting a job. Then, state inspectors must be present during installation and health records must be kept for all employees on the job.

   Dennis is going to determine if we did voluntarily label with the "half a label" approach we are proposing, could TRANSITE be exempted from the Cal OSHA notification and inspection process? The logic is that we meet OSHA requirements because of the work practices program, and our label is just a reminder that those practices should be followed.

We will await Dennis Markusson's opinion from Cal OSHA before proceeding with the labeling question with other pipe manufacturers through the A/CPPA.

E. D. Marcucci

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