Division: Chemicals and Plastics
Location: New York

This copy for: JPZ 9/24

Originating Dept.: Group I Distribution Operations

Answering letter date:

Subject: Asbestos Warning For Heat Resistant Phenolics

Copy to:
Mr. J. H. Barrett - SV
Mr. E. Bell - BB
Mr. W. J. Dugan - SV
Mr. A. A. Eng - BB
Mr. C. F. Martino - BB
Mr. P. A. Thomas - BB

The asbestos fibers in Union Carbide's heat resistant phenolics compounds are considered modified by a bonding agent and, thus, to be exempt from the requirement to print caution labels on mixtures containing asbestos fibers published in the Federal Register, Vol. 37, No. 110-Wednesday, June 7, 1972.

Pertinent sections of those rules and regulations are as follows:

(i) Caution Labels - Labeling: Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably forseeable use, handling storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

(ii) Label Specifications. The caution labels required by subdivision (i) of this subparagraph shall be printed in letters of sufficent size and contrast as to be readily visible and legible. The label shall state:

CAUTION

Contains Asbestos Fibers
Avoid creating dust
Breathing Asbestos Dust may Cause
Serious Bodily Harm

Review of this subject at the Group I Label Committee Meeting, October 24th, found general agreement by medical and law department representatives on this conclusion based on previous customer experience. However, Mr. C. Martino will be determining the airborne concentration of asbestos fibers produced through simulated customer useage of one of the highly filled compounds such as BMS-5303, BMRS-5303, or BMVA-5353 and inform us of the test results.

No action will be taken to place caution texts on heat resistant phenolic resin packaging at this time. If the tests by Mr. Martino indicate a need for caution labeling, this will be reviewed with yourself and Operations Team personnel.

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D. E. Gould



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