

A Berkshire Hathaway Company

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## Johns Manville's Polyisocyanurate Roof Insulation with Inorganic Coated Glass and OSHA's Respirable Crystalline Silica Rule

On March 25, 2016, the Occupational Safety and Health Administration (OSHA) issued a rule regulating respirable crystalline silica in construction, general industry, and maritime. Compliance with nearly all aspects of the standards is already required or will be by the end of June 2018.

Johns Manville (JM) has an extensive Product Stewardship Program, which includes an evaluation of all raw materials used in our products. Johns Manville manufactures polyisocyanurate roof insulation products with inorganic-coated glass facers, sold under the following trade names: ENRGY 3® CGF, ENRGY 3® FR, Invinsa Foam®, Invinsa®, Invinsa®, Invinsa® FR, SeparatoR® FR, and ValuTherm™ CGF. JM has conducted industrial hygiene sampling during the manufacturing of the product to determine the potential for respirable crystalline silica exposure. All of these monitoring results for respirable crystalline silica were below the reporting limits for the analytical method (non-detect). Because the inorganic coating contains an earthen raw material, the possibility for trace amounts of silica bound into the product exists, but the amounts are below thresholds for product classification, and respirable particles are not expected to be liberated during normal use. Additionally, the glass facer consists of amorphous (non-crystalline) glass fibers. Although silica is used as a raw material in the manufacturing process, the glass facer does not contain crystalline silica in the finished product.

Therefore, JM is confident that expected occupational use of glass fibers will not result in exposures that would potentially contribute to the exceedance of either the OSHA permissible exposure limit (PEL) for respirable crystalline silica of  $50 \mu g/m^3$  or the OSHA action level (AL) of  $25 \mu g/m^3$ . For more information, JM recommends that employers review the resources posted at the OSHA Silica Final Safety and Health Topics website (https://www.osha.gov/dsg/topics/silicacrystalline/).

If you have additional questions, please contact JM Product Stewardship at <a href="mailto:ProductSafety@jm.com">ProductSafety@jm.com</a>.

Version 1.0, Issue Date: 6-June-2018