T. THOMPSON

EATON Internal Correspondence

Date: April 10, 1987

SALES DEPARTMENT LETTER #87-7

To: All Field Sales Offices and Distributors

Copy:

From: Paul S. Showalter

Subject: Asbestos Update

This is further update on the status of the asbestos friction materials use in some of our products.

On June 20, 1986 OSHA put into effect amended rules regarding occupational exposure to asbestos (29 CFR Section 1910.1001). These new rules reduce the permissible 8-hour, time-weighted exposure limit from 2 fibers to 0.2 fibers per cubic centimeter and significantly change an employers responsibilities

A new "action level" of asbestos concentration was established at 0.1 fibers per cubic centimeter. If there is reason to believe that his employees are exposed to asbestos concentrations at or above this level, then the employer is compelled to undertake a monitoring program to evaluate the actual exposure levels. If this monitoring confirms that the asbestos concentrations exceed the "action level", then the employer must institute employee training and medical surveillance programs at no cost to the employee.

If the asbestos concentrations exceed the new lower permissible exposure values, then the employer must take a number of additional actions including posting signs warning of the asbestos hazard, limiting access to the hazardous area and following specific requirements concerning protective clothing and the disposal of waste. In addition the employer is compelled to initiate programs to reduce the exposure levels by engineering controls such as exhaust ventilation and use of respirators.

As we have previously indicated (see Sales Dept. Letter 86-04) it is Eaton's opinion that the amount of asbestos liberated into the environment by the normal operation of our products with asbestos friction material is quite small. The likelihood of creating airborne fiber concentrations approaching the new "action level" appears to be significant only if the customer grinds, sands or otherwise machines the blocks, of if inappropriate methods (such as sweeping or blowing with compressed air instead of vacuuming) are used to clean up any friction residue that may be created by the unit. However, we cannot know the specific application, environment, maintenance, clean up procedures, and presence of other asbestos sources at a customers facility. The regulations place the responsibility for determining if the levels need to be monitored on the employer.

In order to remove or minimize the presence of asbestos as a problem in the workplace, we are proceeding to adopt non-asbestos material as standard for all of our product lines. Over the past few months we have been depleting our inventory of asbestos friction materials by using it to fill orders where the customer has not explicitly asked for non-asbestos materials. However, any orders received after April 1, 1987 for our CB, VC, E, EB, VE, DBA, DP and HD product lines for use in non-slip applications will be shipped with non-asbestos friction only. As soon as our current order backlog is cleared, the balance of our asbestos inventory will be scrapped and we will no longer provide asbestos linings for these products even if specifically requested by the customer.

As of this time, we have yet to find a suitable non-asbestos material for use in the CS, CSA and CTE product lines nor a slip material for the VC, DP and HD product lines. While we continue our search for appropriate materials, asbestos linings will continue to be used on these products. If we do not come up with a new material in the next several months, other modifications may have to be made.

Paul Showalter

Form E30-23 (Rev. 12/83)

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