



ASBESTOS INFORMATION ASSOCIATION

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COPY

27 October 1976

Dr. Andrew Breidenbach
Assistant Administrator for
Water & Hazardous Materials
Environmental Protection Agency
401 M Street, S.W., Rm W-1037
Washington, D. C. 20460

Dear Dr. Breidenbach:

I am sorry I was unable to meet with you this past Friday to discuss the use of asbestos cement pipe and asbestos brake and clutch linings as a "sample research request" in the Request For Proposal No. WA 76-B231, distributed by EPA letter of August 2, 1976. I know John Autry of Johns-Manville Corp. and Joseph Jackson of the Asbestos Cement Pipe Producers Association ably voiced the industry's objection to the use of these locked-in asbestos containing products as the single example of "sample research request," Enclosure IV, for possible studies on the economic impact of selected control options for particular toxic substances.

The EPA letter came to our attention only a few days ago. We were surprised that we did not have the opportunity to discuss the contents of Enclosure IV of the document with your people. As you know it is an objective of this Association to maintain close liaison and cooperate fully with EPA in those matters of mutual interest. Certainly, even in a "sample research request" it is less than fair and highly presumptive to suggest a requirement, "that no A/C pipe be produced or installed in the U.S. from two (2) years from a specified date" or "no asbestos containing friction products be utilized in any motor vehicle produced or imported into the United States from two (2) years from a specified date." We are unaware of any scientific data that would justify the extreme suggestions contained in the "sample research request."

We believe public distribution of Enclosure IV to the EPA letter can in itself have an adverse impact on the asbestos industry even if not intended. Though asbestos has recently been listed among 65 toxic pollutants, to single out products



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

2 AUG 1978

Gentlemen:

Subject: Request for Proposal No. WA 76-B231

You are invited to submit to the Environmental Protection Agency a proposal for a study of the Economic Impact of Selected Control Options for Particular Toxic Substances.

The Period of Performance for completion of the work called for in the enclosed Statement of Work will be 24 months. It is anticipated that a Cost-Plus-Fixed-Fee (CPFF) term contract will result from this solicitation; however, the Government reserves the right to award another type of contract.

Your "Technical Proposal" shall be submitted in accordance with the enclosed Technical Proposal Instructions. Your price or cost breakdown shall be submitted by separately identifiable tasks, utilizing DD Form 633-4 or Optional Form 60, which shall be completed in accordance with the enclosed "Business Proposal Instructions." The Technical Proposal and the cost or price breakdown shall be separate and complete in themselves so that evaluation of them may be accomplished concurrently and independently. The Technical Proposal shall be precise, factual, and complete, and not contain any reference to cost.

This request does not commit the Government to pay any costs incurred in the submission of your proposal or in making necessary studies or designs for the preparation thereof. Nor does it commit the Government to procure or contract for said services or supplies. It is also brought to your attention that the Contracting Officer is the only individual who can commit the Government to the expenditure of public funds in connection with this proposed procurement.

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associated with asbestos for illustrative purposes in the EPA letter seems to us to be unwarranted and discriminatory. We believe reference to asbestos containing products, that is A/C pipe and asbestos brake and clutch lining in Enclosure IV of the EPA letter, gives the reader the impression of pre-conceived opinions or attitudes leading to public misapprehensions.

Though it is our understanding responses to the RFP are now being evaluated, we believe that it would be proper to advise the recipients of the August 2 letter that Enclosure IV was developed for illustration purposes only and does not necessarily reflect fact or opinions of the federal government with regard to the toxic effect of asbestos containing materials or actions contemplated by EPA with regard to asbestos containing products, in this instance A/C pipe and asbestos brake and clutch linings.

We would appreciate hearing from you on this matter.

Sincerely yours,



R. H. Mereness
Executive Director

cc: MEMBERS

Adrian May, Esq., Cadwalader, Wickersham & Taft

Mr. John Autry, Johns-Manville Corp. (Washington office)

Mr. Joseph Jackson, A/C Pipe Producers Assn.

Mr. E. Drislane, Friction Materials Standards Institute

RHM:v

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