

Asbestos and The Friction Material Industry

Other requirements concerning use of tailings for surfacing roads, the regulation of demolition activities, and controlled application of spray-on materials are of little concern to friction materials processors. Our biggest concern lies with the emission standard, which will require the tightening up of dust collection facilities and waste disposal practices wherever fugitive dust problems occur.

The biggest problem with EPA regulation I have found thus far has been non-uniform interpretation of what constitutes a visible emission. I know the EPA people who drafted the regulation intended this to mean just what it says. If it's visible under any condition whatsoever, and EPA approved air cleaning systems are not in use, the emission is in violation. Since most friction materials manufacturers already are employing baghouses that meet EPA standards for cleaning their exhaust air streams, it is unlikely that any severe impact will occur to the industry as a whole on account of the EPA regulations as they now stand. Those few manufacturers who are relying on wet dust collectors that do not meet the EPA standard may have problems. The best way to be sure of meeting EPA requirements is to sharpen up on maintenance and operation of existing baghouse filters and replace existing wet collectors with baghouse filters to eliminate visible emissions.

In summary, the OSHA and EPA Asbestos Regulations are alot more lenient than many interested and concerned parties wish. We can expect pressure to have them tightened. Friction materials manufacturers should support Asbestos Industry efforts to have them mitigated in hopes they at least aren't made more severe. In the meantime, we should conform to the regulations to protect our employees and our customers and to avoid criticism and enforcement actions.

Your Asbestos Study Committee will continue to follow the interpretation of existing regulations, the trend of proposed changes, and the development of new medical and scientific study material that may affect future regulation of asbestos products. We welcome your questions and any input you may be able to make concerning our activities.
