PLAINTIFF'S EXHIBIT
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AB-204

Abex Corporation

Research Center

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November 8, 1971

Mr. Samuel T. Lawton
State of Illinois Pollution Control
189 West Madison Street
Suite 900
Chicago, Illinois 60602

Dear Mr. Lawton:

In conjunction with hearings recently held regarding Regulation No. R71-16 "Asbestos and Spray Insulation" proposed by the Illinois Pollution Control Board, we believe it would be helpful to you to have our comments as a major manufacturer of friction material.

The Abex Corporation, through its American Brakeblok Division is one of the major suppliers of friction material for brake and clutch use in the United States. During 1971, our sales of asbestos containing friction material for use in vehicles operating in the United States will be in excess of 20 million dollars.

Our interest is specific to Part VII, Section 702 of the proposed regulations which states "The use of asbestos in the brake lining of vehicles manufactured after January 1, 1975, and sold for use in Illinois is prohibited". Our comments are as follows:

1. Asbestos fiber is an important component of organic friction material used in brake and clutch facings for vehicles manufactured and used in the United States. Of known fiberous material, asbestos imparts unique strength and thermal properties to friction lining, in addition to providing unique performance characteristics essential to safe and reliable braking and clutching of vehicles.

2. We are aware of investigations conducted on the nature of wear products from linings in use, as well as the identification of airborne particles from operating brakes. Air sample analysis conducted by our Medical Department to collect wear product particles during brake operation on our laboratory dynamometers confirms the findings of J. R. Lynch as reported in his study "Brake Lining Decomposition Products" published in the Journal of the Air Pollution Control Association, Vol. 18, No. 12, December, 1968.

3. Abex Corporation, in conjunction with Arthur D. Little, Inc., submitted a technical proposal to the Evironmental Protection Agency in response to that agency's request for proposal No. EHSD 71-NEG 102 "Characterization of Emission from Automobile Brake and Clutch Linings". In this way we are well aware of the investigation work now being carried out by the Bendix