FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE #4, PARAMUS, N.J. 07652

April 25, 1979

TO: BOARD OF DIRECTORS

SUBJECT: EPA VOLUNTARY ACTION FOR BRAKE LINING "DO-IT-YOURSELFERS" UNDER TOXIC SUBSTANCES CONTROL ACT

Mr. Jim Reis of Johns-Manville called on April 18, 1979 asking if I had any information on the EPA's concern with consumer use of friction materials. He mentioned that Mr. Dick Carter of Johns-Manville, who works on environmental affairs, had spoken with Mr. John DeKaney, a Deputy Assistant Administrator with EPA. Mr. DeKaney indicated that the EPA was concerned with the consumer use of friction materials. He had estimates that 30% of brake jobs were done by the "do-it-yourselfer" (DIY). This concern apparently extends beyond the "do-it-yourselfers" to work in small garages and areas like that. I had been under the impression that small garages were the concern of OSHA and not EPA. However, Mr. Reis indicated that EPA believes it may be their concern under the Toxic Substances Control Act. Mr. Reis felt at this time that EPA was studying this question.

The EPA recently took action on asbestos in school ceilings with a voluntary action program. By having a voluntary action program they were able to make some progress in this area without raising considerable controversy. Mr. Reis feels that EPA may use this approach in this area.

In the conversation with Mr. DeKaney, Mr. Carter of JM indicated that the brake lining manufacturers had taken some action and pointed particularly at the "Friction Materials Work Practices Guide" that the Institute recently published. The EPA was not aware of this material. In other words, our voluntary action with a "Work Practices Guide" as well as information we have put out earlier and distributed to the trade press may be of help in a voluntary action program in the "do-it-yourselfer" area. Whether this DIY area is also extended to the small garage is another question.

I've now received a letter from Mr. Jim Reis on this subject. A copy is enclosed. If we were to contact Mr. DeKaney I would propose showing him, in addition to the recently published "Friction Materials Work Practices Guide":

1. "Recommended Procedures for Reducing Asbestos Dust During Brake Servicing" (copy enclosed)
   1.1 This was distributed in one page format in 1977 and has been in our catalogs (last page) since 1977.

2. Releases to various trade magazines based on the above "Recommended Procedures."
   2.1 Brake and Front End - July 1977
   2.2 Commercial Car Journal - April 1977
   2.3 Fleet Owner - April 1977
   2.4 Jobber Topics - May 1977

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3. OSHA required warning on all brake lining cartons:
   3.1 CAUTION
   Contains Asbestos Fibers
   Avoid Creating Dust
   Breathing Asbestos Dust May Cause
   Serious Bodily Harm
4. Suggestion to Membership on carton insert based on Raybestos "three do's and three don'ts."

I will discuss this with your President, Mr. Messier, and with the Chairman of the Asbestos Study Committee, Mr. Wagner, for their recommendations. In the meanwhile, additional input from Board and/or Committee members will be welcome.

E. W. Drislane
Executive Director

CC: Asbestos Study Committee