

It was recommended that this subject be returned to the Board of Directors for further consideration. At the subsequent Board meeting, it was resolved that the affirmative votes of two thirds of the Active Members casting ballots within 30 days of the mailing of ballots would be required to elect a new Member. Ballots will be sent to the Membership for ratification of this proposed amendment of the Constitution.

HEALTH AND ENVIRONMENTAL AFFAIRS COMMITTEE

Mr. J. W. Armstrong, Chairman of the Health and Environmental Affairs Committee presented his committee report. Refer to EXHIBIT 9.

Mr. Armstrong addressed the items referred to the Committee at the 1980 Meetings. These had to do with the approaches to assist members who were having difficulties with health and environmental regulations. He covered steps the Institute had taken to advise on the outside help that is available, and noted the series of information bulletins that were sent to the Membership on EPA matters, hazardous waste disposal, and the like. Mr. Armstrong then discussed the possible exchange of information on citations from regulatory authorities and the corrective action involved. A questionnaire had been sent to the Membership relating to questions in this area.

Mr. Armstrong then reviewed initiatives from the EPA's Office of Toxic Substances, and the comments the Institute sent the EPA as concerns EPA proposals on record-keeping and reporting to that agency. His report covered what appeared to be a new "spirit of cooperation" between EPA and industry, and the new liaison between the EPA rulemakers and representatives from industry. Mr. Armstrong's report concluded with comments on OSHA, and the indication that there is a temporary hold on asbestos regulations that could affect the friction materials industry.

After delivering his report, the Chairman commented that he had requested comments or input from Members who were having specific problems, but that comments or input were not received. After the EPA had made broad proposals on recordkeeping and reports for the asbestos products industry, comments were solicited from the Membership but none were received. The comments sent to EPA were those of the Committee only. A questionnaire had been sent to the Membership on areas where the Committee might assist the Members, but only six questionnaires were returned. Mr. Armstrong stated that he felt the Committee had responded to what he felt were the needs of the Members, but that there was little input from the Membership when the Committee solicited input.

In response to a question concerning asbestos as a hazardous waste, the Chairman stated that asbestos had been temporarily removed from the RCRA definitions of hazardous waste because it is controlled by the National Emissions Standards for Hazardous Air Pollutants (NESHAPS). There are indications that asbestos will continue to be controlled by NESHAPS rather than by RCRA. The Research Triangle Institute is studying this question under a contract from the EPA.

Comments were made concerning asbestos dust counts and other observations on asbestos emissions. It was stated that it would probably be in the best interests of the manufacturer that if sampling tests have been made which show that asbestos counts are within regulatory limits, it would be in that manufacturer's best interests to maintain those records. It may be advantageous to have documentation proving that sampling has been done, and that the tests showed compliance with regulations.