

November 21, 1979

TO: HEALTH AND ENVIRONMENTAL AFFAIRS COMMITTEE

SUBJECT: MEETING OF THE ASBESTOS INFORMATION ASSOCIATION'S AD HOC
COMMITTEE ON FRICTION MATERIALS WITH EPA

The AIA's ad hoc Committee on friction materials called a meeting for November 16, 1979 to meet with individual's from the EPA's Office of Toxic Substances. Mr. Richard Guimond of the EPA had requested this meeting. The meeting was held at the AIA's Offices in Arlington, Virginia on November 16, 1979. The following attended:

Al Colli	EPA/CAD
Dave Mayer	EPA/PID
Jane Nowak	EPA/CAD
Richard J. Guimond	EPA/CAD
I. H. Weaver	Raybestos-Manhattan
Ronald R. Moalli	Raybestos-Manhattan
E. W. Drislane	FMSI
J. R. Weber	Bendix
John H. Marsh	Raybestos-Manhattan
Tim Hardy	Kirkland & Ellis
C. H. Borcharding	Abex
Bob Pigg	AIA/NA

Prior to the arrival of the individual's from EPA the Committee was advised that the EPA would not extend the date for comments on their advanced notice of proposed rulemaking (ANPRM) issued on October 17, 1979. This notice called for comments by December 17, 1979 and EPA indicated earlier in the week that they would not extend the deadline. It was also indicated that they would propose rulemaking for certain friction materials under Section 6 of the Toxic Substances Control Act, in the Spring of 1980. They would also invoke Section 8 where parties are required to provide certain information. At 10 A.M. Mr. Guimond, Mr. Colli, Mr. Mayer and Miss Nowak arrived and the meeting commenced.

VOLUNTARY GUIDANCE APPROACH ON FRICTION MATERIALS

Mr. Guimond distributed a copy of an agreement between OSHA and the EPA asking that OSHA provide educational materials such as pamphlets, booklets, audio-visual training, etc. for brake repair mechanics and schools. The contract provided that a pamphlet would be developed and 4 100,000 copies prepared. The contract would be handled by the Public Media Center in San Francisco, California. The contract was awarded on November 13, 1979. Western Chemical would be a sub-contractor on this work. Western Chemical is Dr. Polikoff's group.

Mr. Guimond indicated that they would attempt distribution of their materials with the cooperation of the IAM (International Association of Mechanics) and the NIASE (National Institute for Automotive Service Excellence). He would be interested in other groups for distribution and training materials. They would like to have their materials ready

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for distribution by June 1980. They are looking for practical dust control techniques which could include a variety such as wet methods, Tempo type collector, Milfisk and others. In response to a question, Mr. Guimond indicated that asbestos bearing friction materials would be around for awhile and the guidance program would be complementary to any regulatory steps that they take. It was suggested that the Abt Associates study which was run for the Department of Labor in 1977 might be helpful when considered in conjunction with the criticisms expressed on the report at that time. Mr. Drislane indicated that he would send Mr. Colli a copy of the Abt Associate reports along with the criticism.

REGULATORY APPROACH TO ASBESTOS-CONTAINING FRICTION MATERIALS

Mr. Guimond distributed an eleven question draft entitled "Informational Need for Friction Products Containing Asbestos." This information gathering aimed primarily at information on substitutes for automobile and light truck disc brake linings. They are talking about proposals in the Spring of 1980 on the regulatory approach. A question was asked as to how they could go to the regulatory approach before the necessary information had been gathered. Questions were asked on how members and others could gather such information and provide the data to the EPA. Mr. Guimond asked how soon we could gather this type of information. I indicated it would take at least two weeks to decide on what to answer the EPA. If the Institute were to participate in gathering the information it would take another eight weeks. There was a question as to whether member companies would provide this information on a voluntary basis. There will be concern on safeguards as regards confidentiality of the data and non-disclosure of the source of the information. Such restrictions on sources of data might be at cross-purposes with the information gathering that EPA wishes.

There were comments and discussion concerning clinical and epidemiological data. The information gathered on the Continent by the German group had been sent to EPA. They were familiar with that information. Mr. Guimond was familiar with preliminary work by Dr. Nicholson which gathered some background on exposure levels and information on practices in the brake repair area. The clinical information is not complete and EPA indicated that it would be ready in about two months.

There were other suggestions as to having EPA go directly to member and non-member companies for their information. The Institute would be pleased to give a listing of the various friction material manufacturers in the United States for that purpose. Before they take the regulatory route they would like response to the eleven questions that were posed concerning ingredients and substitutes for disc brake linings. They will take this information anytime even, of course, after the December 17, 1979 cut-off for comments on their ANPRM.

In response to an inquiry, Mr. Guimond indicated that he would be interested in a plant tour if a member company would make such a tour available. Mr. Colli questioned whether there was any written information indicating that conventional shop vacuum equipment was inadequate for controlling asbestos dust. A lot of the concern has been on using expensive sophisticated multi-stage filter equipment such as the Milfisk cleaner. It was suggested that some shop vacuum equipment may do a decent job in controlling dust exposures in the brake repair facility.

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BOARD OF DIRECTORS MEETING FOR THE INSTITUTE

Based on these discussions with EPA, the President, Mr. Moalli, decided that the Institute's Board of Directors should be called for a meeting. They should be advised that input will be needed on the eleven questions posed by EPA concerning ingredients and substitutes in asbestos friction materials. The subject of cost figures would be somewhat controversial and usually considered proprietary by the members.

The Secretary would work out a meeting location and meeting time for the Board of Directors. Mr. Pigg and Mr. Hardy would be invited to this meeting as would Mr. Jim Armstrong, Chairman of the Institute's Health and Environmental Affairs Committee.

EWD/lmc

E. W. Drislane
Executive Director

NOV 15 1979

Informational Needs for Friction Products Containing Asbestos

1. What are the basic ingredients used in nonasbestos linings for disc brakes? Specific formulations are not necessary.
2. What are the basic ingredients under consideration for use in nonasbestos linings for drum brakes? Specific formulations are not necessary.
3. What data or evaluations are available regarding the health effects of nonasbestos brake linings or materials used in them?
4. What are the performance characteristics and the problems associated with the use of substitute products for brake linings containing asbestos?
5. Are nonasbestos brake pads used in conjunction with asbestos pads? For example, is the outer part of the pad nonasbestos and does the inner pad contain asbestos?
6. Are nonasbestos brake pads interchangeable with asbestos brake pads? If the vehicle has a nonasbestos pad as original equipment, must the replacement pad be nonasbestos?
7. Are the composition and manufacture of nonasbestos brake linings developed by your company protected by patent or are they trade secret?
8. Are there mechanisms for the transfer of this technology to other companies who manufacture brakes for vehicles? For example, would your company consider licensing of the technology to manufacture nonasbestos brake pads?
9. Can nonasbestos brake products be manufactured in existing production facilities or will new facilities be required? What will be the capital and operating costs associated with change over?
10. What is the projected price differential between brake linings containing asbestos and nonasbestos substitutes?
11. Do brake systems which utilize nonasbestos friction products require a different design from brake systems with linings containing asbestos? If component parts for use with nonasbestos linings are different, what is the product price differential?

DRAFT 11 QUESTIONS FROM EPA--THE INSTITUTE WILL ASK EPA
FOR CLARIFICATION AND POSSIBLE RE-WORDING OF THESE QUESTIONS.

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FMSI 03482

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