



Intra Company

ENGINEERING AND
MANUFACTURING STAFF
January 18, 1972

To: Mr. J. U. Damian
Mr. B. H. Simpson

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cc: Mr. W. M. Brehob
Mr. D. R. Buist
Mr. R. L. Gealer✓
Mr. D. A. Jensen
Mr. H. L. Misch
Mr. W. R. Pierson
Mr. C. W. Schwartz
Mr. M. F. Valade

Subject: Control of Asbestos Emissions -- Progress Report.

The proposed standards for asbestos, beryllium, and mercury appeared on a Federal Register (December 7, 1971, volume 36, No. 234). In December, 1971, the EPA also published "Background Information -- Proposed National Emission Standards for Hazardous Air Pollutants: Asbestos, Beryllium, Mercury", to supplement the Federal Register. This letter is intended to bring you up to date on the subject of asbestos control and the possible effects that such a standard may have on the automotive industry. A discussion dealing with the sources of asbestos, effects on health, alternates to asbestos brake-lining, etc. were discussed in an earlier letter (copy attached).

Although the proposed asbestos standard is not defined in terms of numerical values, it does require that all asbestos emission sources provide adequate asbestos emission controls. A numerical standard may be adopted in future when:

1. A dose-response relationship between levels of airborne asbestos and resulting human diseases is established.
2. Reliable and rapid analytical technique are available to determine the level of asbestos emissions from different sources.

In reviewing the EPA publication, it is apparent that the control of asbestos emissions from brake-lining is not a "dead-issue" as many would like to believe. The report states that "The asbestos emissions from use of these materials (brake-lining is one of them)

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can be significant" and that "A program for determining the extent and nature of asbestos emissions from automotive brake-lining is now in progress in the Office of Air Programs". Specifically, the above mentioned program is being conducted by the Bendix Corporation.

The EPA publication also states that the regulation of asbestos emissions from brake-lining lies outside the authority of Section 112 of the Clean Air Act. This implies that each State has the authority to regulate asbestos emissions from brake-lining in the event such control is deemed necessary. Such action was considered recently in the State of Illinois which planned to prohibit the use of asbestos in brake-linings beginning with the 1975 model year. Although no action was taken, the matter may be brought up again.

J. S. Ninomiya
J. S. Ninomiya
Automotive Emissions Office

Attachment

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