

FRICTION MATERIALS STANDARDS INSTITUTE, INC.

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PARAMUS, N. J. 07652

20 March 1986

Mr. John A. Riopelle
Allied Automotive
Bendix Friction Materials Division
P.O. Box 238
Troy, NY 12181

Dear Rip:

I received your marked up changes to the draft of our earlier letter. I have included the corrected sections in the enclosed draft (Headings entitled: "Asbestos Exposure in the Brake Repair Shop," and "Chrysotile Asbestos in Brake Linings.").

In addition I have changed the introduction to be a response to the recent EPA Ban and Phase Out Proposals. Where I simply referred to our earlier letters, I made these the major headings: "Earlier Comments to OSHA on Occupational Exposure to Asbestos," and "Earlier Comments to EPA on Petition to Ban Asbestos Brake Linings." I enlarged on certain points in those earlier letters.

Then, I added two new sections aimed directly at the new proposals: "Proposed Permit System," and "Labeling of Asbestos Friction Products." And then I closed it with a few new words at the very end.

This is a Draft. The two sections noted in my first paragraph are exactly as you had marked up the earlier copy. The rest of the comments are new. Please mark these up in whatever fashion you feel proper. And then, the sooner you get this back to me the sooner I can run it by the Board and Legal Counsel so that we get it in on time to the EPA.

If any question, please give me a call.

Sincerely,

FRICTION MATERIALS STANDARDS INSTITUTE

E. W. Drislane
Executive Director

FMSI--0446

FMSI 02418

EPA
PROPOSED NEW ASBESTOS REGULATION

PROPOSED RULE

- o BAN A/C PIPE, ROOFING & FLOORING FELTS, VINYL-ASBESTOS FLOOR TILE, CLOTHING.
- o PERMIT REQUIRED TO USE ASBESTOS IN OTHER PRODUCTS
- o REDUCE CONSUMPTION ANNUALLY TO ZERO AFTER 10 YEARS, EXCEPT UNDER A SPECIFIC EXEMPTION.
- o LABEL ALL PRODUCTS CONTAINING ASBESTOS.

OPTION 1

- o BAN CONSTRUCTION PRODUCTS AND CLOTHING IMMEDIATELY
- o BAN ASBESTOS FRICTION PRODUCTS ABOUT 5 YEARS LATER (CONSIDER A/M EXEMPTION)
- o GATHER ADDITIONAL INFORMATION ON OTHER PRODUCTS
- o LABEL ALL PRODUCTS CONTAINING ASBESTOS

OPTION 2

- o BAN CONSTRUCTION PRODUCTS AND CLOTHING IMMEDIATELY
- o BAN ASBESTOS FRICTION PRODUCTS ABOUT 5 YEARS LATER (CONSIDER A/M EXEMPTION)
- o BAN REMAINING ASBESTOS PRODUCTS ABOUT 10 YEARS LATER
- o LABEL ALL PRODUCTS CONTAINING ASBESTOS

OPTION 3

- o BAN CONSTRUCTION PRODUCTS AND CLOTHING IMMEDIATELY
- o COVER ALL OTHER PRODUCTS UNDER THE PHASE-DOWN
- o LABEL ALL PRODUCTS CONTAINING ASBESTOS
- o PERMIT REQUIRED TO USE ASBESTOS

TIMING

- o COMMENTS BY APRIL 29, 1986
- o PUBLIC HEARINGS START MAY 14, 1986
- o EPA PROPOSED FINAL RULE TO OMB - SOMETIME IN 1987
- o EFFECTIVE DATE OF NEW RULE - JANUARY 1, 1988 (EARLIEST)

J.A.R. 3/3/86

FMSI 02419