

February 8, 1980

TO: Delegates and Alternates

SUBJECT: EPA Office of Toxic Substances Questions Concerning
Asbestos and Non-Asbestos Disc Brake Linings

Based on Board of Directors recommendations, an Institute Task Force met with EPA in Washington to clarify and modify the Eleven Questions that EPA had drafted to ask manufacturers of friction materials. As you may be aware, the EPA is permitted under the Toxic Substances Control Act to subpoena information relative to initiatives in this area. The Institute feels it to be prudent to work with EPA on a voluntary basis in providing information and background so that any actions they take will be based on facts rather than assumptions.

We are asking, therefore, that member companies who manufacture asbestos or non-asbestos disc brake linings for passenger cars and/or light trucks (under 10,000# GVW) respond to this questionnaire. At some later date, the EPA will probably ask similar questions concerning drum brake linings, brake blocks, etc.

Control of Individual Company Response

It is suggested that individual member companies have one individual control and coordinate the response. In this fashion, he will insure that contradictory responses are not sent to the regulators by individual contacts or questions from others in Washington. Along this line, it has been suggested that responses to EPA and others be only sent where the request for information is in writing. This is to avoid conflicting responses to telephone inquiries and the like.

Institute-Coordinated Response Versus Individual Direct Response

The Institute is attempting to coordinate the response to EPA. Replies will not be attributed to companies, but it must be remembered that EPA does have subpoena power and could determine the source of the answers. If individual companies wish to comment on other aspects of this subject--beyond those suggested in the questions--they should add comments. We will code the answers for our response to EPA.

Legal Counsel Review of Responses to Questionnaire

Institute's Legal Counsel had asked to review the questionnaire. He has failed to respond to several requests to review and approve this questionnaire for circulation. It has been decided to release this questionnaire as written, but the Members are urged to have their own Legal Counsel review the individual replies.

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Replying Directly to EPA

If a member company feels it would be in its best interest to reply directly, the response should be sent to:

Mrs. Joni T. Repasch (Record Clerk)
Office of Toxic Substances (TS-793)
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
(Mark Prominently: Docket Number OTS-61005)

If you do reply directly, your response is part of the public record. If you provide any confidential or proprietary information, you should provide it only if the EPA can assure you that the confidentiality of the information can be safeguarded.

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There is no question but that the EPA is considering a ban on asbestos in friction materials. Their first step is with automotive disc brake linings. We believe that accurate objective information can influence decisions to be made in this area, and recommend that all member companies help with this response. As indicated earlier, if they do not get this information on a voluntary basis, they can compel it.

We are trying to gather this information so that we can forward it to EPA no later than March 31, 1980.

EWD/erc
cc-Health & Environmental
Affairs Committee

E. W. Drislane
Executive Director

FMSI 03653

1. What are the basic ingredients used in non-asbestos disc brake linings, which were not used in earlier asbestos type formulations? Of particular interest are the materials used to substitute for asbestos--those that reflect a net change.
2. As regards the substitute materials, if the substitute is fibrous, what are the physical characteristics of the fiber--structure, fiber size, size distribution?
3. What are the performance characteristics and the problems associated with the use of substitute products for disc brake linings containing asbestos? How do the substitute non-asbestos pads compare with asbestos pads for lining wear, rotor wear, noise, wet recovery, etc.?
4. Where you are the original equipment supplier of non-asbestos type disc brake linings would you describe the packaging of asbestos and non-asbestos linings within the brake itself? In other words, present model year and application data for:
 - 4.1 Full non-asbestos linings
 - 4.2 Non-asbestos friction material with asbestos backing
 - 4.3 Use of non-asbestos lining at one position (inner or outer) with asbestos type lining at other position
5. Describe the historical development of non-asbestos disc brake linings with date and/or time from (1) initial research, (2) successful laboratory prototype, to (3) availability of commercial product. Also, estimate research and development cost for development of commercial non-asbestos disc brake linings (either in total or for each phase of the development).
6. If a vehicle has a non-asbestos pad as original equipment, what problems or advantages do you see in use of asbestos type pads for replacement?
7. Are the composition and manufacture of non-asbestos disc brake linings developed by your company protected by patent? If so, what are the patent numbers?
8. What mechanisms are there for the transfer of this technology to other companies who manufacture disc brake linings? For example, would your company consider licensing of the technology to manufacture non-asbestos brake pads?
9. Can non-asbestos disc brake linings be manufactured in existing production facilities or will new facilities be required? Please estimate the capital and operating costs, and the availability and lead times associated with acquisition of the machinery and tooling?
10. What is the projected unit cost differential between these three popular domestic disc brake lining sizes containing asbestos and non-asbestos substitutes? (FMSI 728A, 7013A, 7017A)

11. Based on your 1979 production, how much asbestos would be eliminated in a total conversion to non-asbestos disc brake pads?

The foregoing questions relate to passenger car and light truck (under 10,000 lbs. GVW) disc brake linings. The Office of Toxic Substances has indicated that they will be asking questions along a similar line, at some later date, for drum brake linings used on passenger cars and light trucks. And at still a later date, they will ask about brake blocks and probably clutch facings.