

MINUTES OF THE MEETING

of the

ASBESTOS STUDY COMMITTEE

Friday, October 24, 1975, at 9:30 AM

Institute Office, E-210 Route 4, Paramus, N.J.

FMSI-9
8/23/82

MEMBERS PRESENT

H. Wagner, Chairman
E. H. Feierabend
D. E. Stone
I. H. Weaver
J. Dunderdale

Carlisle Corporation
Abex Corporation
Bendix Corporation
Raybestos-Manhattan, Inc.
Royal Industries

OTHERS PRESENT

M. R. Cole
E. W. Drislane

Clapp & Eisenberg
Friction Materials Standards Institute

MEMBERS NOT PRESENT

M. Jacko
E. P. Stefl

Bendix Corporation
H. K. Porter Co.

The meeting was called to order by Mr. Wagner, Chairman, at 9:30 A.M.

MINUTES OF PREVIOUS MEETING

The Minutes of the Meeting held April 28, 1975 had been distributed. These minutes were reviewed and a motion for their acceptance was made.

Upon motion duly made, seconded and unanimously passed, it was

RESOLVED: To accept the minutes of the April 28, 1975 meeting as written.

ASBESTOS INFORMATION ASSOCIATION CONFERENCE

FMSI 06378

The Asbestos Information Association (AIA) held their annual Government-Industry Conference in Washington on September 10-11, 1975. Non-members of AIA were invited to attend this conference. Several individuals representing friction materials attended.

One of the items of interest was the proposed OSHA regulation which was due near the end of September. It had been indicated that the OSHA standards would be oriented more towards work practices than to a numerical standard. Mr. Weaver indicated that the OSHA individual who indicated this did so believing that the new standard would not have a new numerical limit. Apparently there was a lot of movement within OSHA by other groups--possibly labor unions and NIOSH--and that the proposed lower numerical standard came in at the very end of the write-up as it was

prepared for publication. The standard, which will be discussed later, proposed a numerical standard of 0.5 fibers/cc (TWA).

Several attendees stated that this conference was most worthwhile. It gave a good overview on asbestos. The only criticism made was that the speakers did not have sufficient time to be questioned after their presentations. The Institute will continue to monitor this conference and expresses its support of the work of the AIA.

PLANS FOR INSTITUTE SEMINAR ON ASBESTOS

Mr. Wagner and Mr. Drislane had taken the initial steps to organize this seminar. At the April 28, 1975 meeting of the Asbestos Study Committee a resolution was passed recommending that the Institute sponsor a workshop on the asbestos problem in the fall of 1975. This resolution was reviewed with the President of the Institute, Mr. Simon, and it was decided to proceed with such a seminar. Mr. Wagner contacted Mr. Noel Hendry of Johns-Manville relative to his putting on a session similar to that which J-M presented two years ago. (For reference: Mr. Noel Hendry, Denver, Colorado, telephone 303-770-1000, Extension 2142). It was suggested that the Johns-Manville presentation would have to be the corner-stone of any seminar and that this would have to be arranged first before arranging other presentations.

Mr. B. K. Kwon of OSHA had been invited by Mr. Wagner to address this seminar. Mr. Kwon had indicated that he should be able to attend. It was suggested that the seminar would be a good time for a synopsis of the major points of the new OSHA standard. Also it would be well for Mr. Kwon to talk with people from our industry.

A comment was made to the effect that OSHA had misled those attending the conference in Washington indicating that the proposed standard would be work practices oriented. (The standard came out with a lower numerical limit.) It was stated that Mr. Kwon was knowledgeable in the industrial hygiene area but he was not a policy maker. He was not responsible for the addition of numerical standard in the proposed amendments to the OSHA regulations.

Mr. Drislane indicated that he had talked with Mr. Bob Mereness of the Asbestos Information Association, and Mr. Mereness indicated that he would be pleased to attend. Also Mr. Drislane contacted Mr. R. Magdelain of Milfisk of America Inc. Mr. Magdelain would be most pleased to put on a presentation relative to that type of vacuum cleaner for the work place. Mr. Wagner also talked with Mr. W. Engeleightener of Ferro-Tech relative to their pelletizing equipment. Mr. Engeleightener will also make a presentation.

At the meeting Mr. Wagner called Mr. Noel Hendry to firm up the J-M participation. In summary, it was indicated that Mr. Bill Reitze would discuss the medical aspects of the regulations. Mr. Ed Fenner would review OSHA and EPA regulations. Mr. Noel Hendry would discuss fiber handling. The J-M presentation will require a 35 mm projector, a 60 x 60 screen, along with a podium and a PA system. Mr. Drislane indicated that arrangements for these would be made.

The seminar will be scheduled for Wednesday, December 3, and Thursday, December 4. The opening session will be a presentation by Johns-Manville for the full afternoon on December 3. Other topics will be scheduled on Thursday morning, with Mr. Mereness (or someone else from AIA) talking at the luncheon on Thursday. There would be a registration fee of \$10 for the seminar. Mr. Drislane will try to make arrangements at either the Marriott at Saddle Brook, the Ramada Inn in Rochelle Park, or the Sheraton Heights in Hasbrouck Heights. Mr. Drislane will write Mr. Magdelain and Mr. Mereness to officially invite them. Mr. Wagner will write to Mr. Kwon, Mr. Engeleightener, and Mr. Hendry to firm up the arrangements. The committee recommends that Messrs. Wagner and Drislane plan and schedule the seminar.

It was suggested that the type of person to be invited should be someone involved with plant problems, but it should also be the foreman or other individual who could get across the message to not use an air hose or a broom.

The possibility of a movie being shown was discussed. It was suggested that the controversial interview of Dr. Selikoff and Dr. Lewinsohn of Turner Brothers would not be the right presentation. Perhaps a movie that emphasized controls in the work place might be worthwhile. No decision was made as regards a movie.

Another suggestion was to have a presentation by those who have used foam to envelope the work station so that no dust is raised during mixing. Mr. Weaver felt that this was an interesting technique. Mr. Stone had discussed this at an earlier meeting but had made no further progress on this since that time. It was decided that this would not be added to the agenda.

As regards the Nilfisk equipment, it was noted that this is good equipment for local pick-up of dust and debris in the work place. However, this subject should be expanded to include a central system such as a Hoffman unit. It was felt that this session should be called "housekeeping in the work place" rather than "Nilfisk". However, the Nilfisk representative would discuss his unique equipment. The idea was to sell the concept of cleaning the work area (not to sell the vacuum cleaner). Mr. Drislane will indicate this particular point to Mr. Magdelain in his invitation.

AIA BOOKLET "ASBESTOS AND BRAKE LININGS"

Mr. Mereness requested Mr. Drislane to have this booklet reviewed for update and corrections. The first question raised was "Who is this booklet aimed at?". Also, "What is the purpose of this booklet?" It was stated that this write-up was not a complete presentation of any particular aspect of the asbestos problem, and while interesting insofar as it went, was not particularly convincing. It is not the type of message that would ordinarily be given to customers of friction material manufacturers. The message for re-builders and the garage people is to not create dust in the work place. There should be more emphasis, if this was the direction of the booklet, on such things as labelling, possible use of instruction sheets, the handling of lining, and the proper use of exhaust systems. One of the problems in the field is that these customers will often groove, chamfer or provide extra drilling. It is during these subsequent operations that asbestos concentrations may be raised to levels above that allowable. It was pointed out the Asbestos Study Committee could not re-write a draft unless it knew what the booklet was aiming at. It was stated that the title is wrong. Perhaps there should

be two separate pamphlets, one for the garage and the re-builder type operation (for those who are doing brake service), and another for the general public. It was stated that the audience for this booklet, as written, must have been the environmentally concerned customer.

Mr. Weaver suggested alternatives as regards this write-up: (1) Drop it--do not use it. (2) Rewrite it for those servicing and installing friction materials. (3) Write a complete new article. The write-up made has little impact. One advantage may be the listing of reference material at the end of the booklet. If the AIA believes that the booklet should get to the user (the customer of the friction materials manufacturer) it is suggested that information be given to the user as indicated in the proposed regulations under "DANGER" labels. This concerns the requirement during "any reasonably foreseeable use, handling, storage, disposal, processing, or transportation" that no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed be released. The items that follow this section on housekeeping and waste disposal are particularly pertinent to the users of friction materials prior to installation on a vehicle.

Mr. Drislane was advised that the Asbestos Study Committee will not re-write the article. The Committee recommends emphasis on recommendations for garages and the re-builders. The Committee would be happy to review a new write-up prepared by AIA which was aimed for this user, with emphasis on the those who actually do subsequent work on friction materials such as grooving, cutting, grinding, chamfering, etc.

RECOMMENDED PROCEDURE FOR BRAKE AND CLUTCH SERVICING

This write-up had been prepared by the Raybestos-Manhattan, Inc. Mr. Weaver distributed copies to Committee members. Raybestos would welcome comments on this write-up along with any recommendations for changes. Committee members wishing to comment should send their recommendations to the Institute office.

THE PROPOSED OSHA STANDARD AND THE 0.5 FIBER/CC LIMIT

Prior to discussing details on the proposed OSHA standards, several members stated that they had been inspected by OSHA. While in a few cases citations were made for higher concentrations of asbestos than permitted, there had been many instances where counts were made without a citation. While the values on the concentration are revealed when a citation is made, OSHA does not provide information on the counts when a citation is not issued. Several members indicated that they believed that OSHA will not provide written results on their test in the work place unless it is necessary to support a citation. In other words, where a citation is not involved they will not reveal the data. Legal Counsel will check on the availability of this information and whether OSHA can be requested to provide this data when a citation is not involved, and will report in writing to the Institute on this.

The proposed OSHA standard is far reaching. The main problem is the new more difficult numerical standard (0.5 fiber/cc). OSHA has put out a list of rather specific items for public participation with the main item being that the comments must be postmarked on or before December 8, 1975.

Written comments concerning the proposal must be submitted in quadruplicate:

Docket Officer, Docket H-033
US Department of Labor, Room N3620
200 Constitution Avenue N.W.
Washington, D.C. 20210

The question was asked as to what would be the most effective means of communicating with Washington to indicate the problems with this new numerical standard. Should the Institute comment? Should the individual members comment? It is not enough for the manufacturer to feel his views will be represented to the regulators by the Asbestos Information Association or FMSI. It was suggested that it would be best if both the Institute and individual members respond with points that are particular to their factories. It is felt that participation by the small manufacturer will be most meaningful. The Asbestos Study Committee will review the proposed standard and note some of the points that members may wish to comment on. It should be pointed out that even if members comment to the effect that they support the AIA comments or they support the FMSI comments, at least they will be on record espousing their viewpoints.

A comment was made to the effect that everyone has been gearing to get their concentrations down to the 2 fiber/cc limit by July 1, 1976. The technology necessary to take the count down to 0.5 fiber/cc is not known. How can comments be made on the cost impact, effects on competition, effects on employment, effects on energy supply, when the technology for getting to the 0.5 fiber/cc is not even known at this time? The least that can be done is to request an extension of time for comments past December 8, 1975. Upon motion duly made, seconded, unanimously passed it was

RESOLVED: That the Institute will request the Department of Labor to delay the cut-off date for comment on these proposed amendments to April 1, 1976.

The friction materials industry does not know whether the 0.5 fiber/cc limit can be reached. Perhaps it will be necessary to go to materials with a material cost ten times that of asbestos in order to get the work place down to the proposed level. Industry is confronted with requirements for Standard 121 and Standard 105-75 from the National Highway Traffic Safety Administration with stringent friction materials requirements at the same time that they must evaluate whether they can still use asbestos in their products.

There are several points in the OSHA standard besides the 0.5 fiber/cc limit. However, the main problem is the 0.5 fiber/cc limit. Some of the comments to follow concerned new problems that may arise as a result of this proposed standard. These problems will be pointed out to the members so that they can look at these from their viewpoints with the aim of advising Washington on their individual problems with this standard.

The reduction of the limit to the 0.5 level is going to effect processors such as the re-builder and the garages who were not really included in this standard before. Any outfit that handles friction materials may very well find airborne concentrations of asbestos fibers that exceed the 0.5 fiber/cc level. For example, a junk yard which might have a side line in brakes might have no problem at the present time. However

any work that they might do which could bring their concentration above 0.5 fiber/cc would now be a problem. These people would now be covered by the requirements of the OSHA standard. Many smaller operators have to drill materials to adapt them to unique shoes in the field. Additional drilling would probably move concentration levels well above the maximum ceiling concentration of 5 fiber/cc.

A point to be mentioned is not to adopt the tactic of "You can't do it." The point is that at the present time technology is not available in the factory to get down to these levels. The industry does not know what the costs are. How can comments be made on cost impact, competition, employment, energy, etc. when the technology to get there is not known? Still further, is such a limit necessary?

It is suggested that unless a member has specific medical information suitable to refute the proposals in the standard that he not attempt to resist the 0.5 fiber/cc limit based on non professional observations of workers made in the past. In other words, if it was not good medical information don't use it. The Asbestos Information Association will try to assemble some realistic medical information for consideration by the Department of Labor.

As regards the problem with cost impact on the consumers, it may be that clean rooms for the elimination of asbestos may be required. Without knowing figures perhaps costs will more than double with poorer performance at a time when the National Highway Traffic Safety Administration is calling for even higher performance.

Members have made extensive plans for equipment, exhaust systems and procedures to get to the 2 fibers/cc limit on July 1, 1976. Since this equipment will not get them to the 0.5 fiber/cc level, this huge capital investment should perhaps be stopped until such time as a new standard is decided. Should a manufacturer discontinue his heavy commitment to equipment for the 2 fibers/cc limit when this equipment will not meet the 0.5 fibers/cc limit?

Could there be more emphasis on protective clothing with cover-alls, smocks, boots and gloves as well as respirators. With reduction to the two fibers/cc level on July 1, 1976 and better work practices, the clothing might do the job as well as the new difficult-to-measure 0.5 fiber/cc limit.

The members don't know how low they can get in fiber counts until this new collection equipment is actually installed and in operation. Suggestions made for cleaning the work area are all well and good but the only proof that one has reached an arbitrary fiber limit is when the installation is completed.

As regards energy who can say that if double the horsepower was added to collection systems that they would get down to the new limit? How can the energy cost be estimated until this same equipment has actually reduced the concentrations down to the new levels?

Where regulated areas are established where allowable concentrations may be exceeded, it is difficult to get employees to wear the proper clothing. If one were trying to operate a clean room along with proper protective clothing, employees would want air-conditioning in the

work place for the uncomfortable clothing. To require air-conditioning in the work place while also maintaining the extensive exhaust systems would be prohibitively expensive--if it can be done at all--because one is at cross purposes with the other. Costs also will be increased because of the new monitoring requirements.

As regards the effect on competition it was pointed out that this may very well be the trigger which would close down some marginal operations with a resulting transfer of jobs outside of the U.S. Even in Great Britain where much medical information has been gathered they have not gone to the 0.5 fibers/cc limit. It does not appear that Great Britain has sufficient medical evidence to support such a limit. Countries on the continent do not have this 0.5 fiber/cc limit. The Latin American countries have no limits. As regards the effect on employment and competition, the huge capital expenditures required for the U.S. plants may very well export additional jobs.

While some of the procedures recommended for handling asbestos and removing the worker from contact with the product may show labor saving results, the actual level of exposure to the remaining workmen from these changes still will be quite high.

There would be considerable costs for members in the friction materials industry to requalify brake blocks and heavy duty segments for the requirements of the NHTSA Standard 121 which went into effect during 1975. There has been a considerable expenditure of funds for Standard 105-75 (hydraulic brake systems standard) by many members. Any changes in the processing or compounding of friction materials necessitated by the proposed OSHA standard would add additional costs for manufacturers in requalifying their materials. The friction materials industry in particular is caught between the forces of improved performance of braking materials along with restrictions on how to manufacture and distribute their materials. There may be considerable testing to requalify materials if there should be a change in processing or compounding.

As regards the costs to consumers and society in general the industry does not know what can be done if it is necessary to remove asbestos from brake lining. The industry could be subject to 5 - 10 years of serious dislocation. In addition to the problems with the OSHA standard that appear evident, costs can not be quantified at this time. Industry needs more time to respond to these far reaching regulations.

One of the requirements for record keeping stated that the records must be maintained for forty years, or for an employment interval plus 20 years, whichever is longer. This is a considerable record keeping requirement. However it was stated that perhaps this is necessary in order for subsequent study of the epidemiology of asbestos. It was suggested that perhaps this is one of the new proposals that can be lived with.

In prior meetings and at prior workshops the problem of correlation of fiber count has been discussed. In general there seems to be some agreement that different experienced counters may total up results showing as much as a 30% variation in counts from the same sample. This is already a problem. However these counts where the 30% variation is evidenced are in the 2 fibers per cc to 5 fibers/cc area. A 30% difference with a 5 fiber/cc count is 1.5 fiber/cc. Here, OSHA is asking for a concentration limit of 0.5 fibers/cc when with current observations there can be variations of as much as 1.5 fibers/cc. As concentrations move towards 0.5 fibers/cc not only does technology get more of a problem.

Industry conditions in 1975 (under the current 5 fibers/cc limit) are much improved over industry conditions which were in effect through most of the 1960's. Each additional step approaching zero fibers/cc is a lot more difficult than the steps that were taken to get industry down to the 5 fibers/cc limit. While it will be burdensome to move the concentrations to the 2 fibers/cc limit, the steps necessary to get down to 0.5 fibers/cc are not known.

There are requirements in the proposed standard for worker re-assignment. If many employees are moved to lesser and lesser duties maintaining the same premium pay that they had received for working with the asbestos products, there will be a negative productivity result. It has been industry practice in the past for night shifts and more difficult tasks to command higher pay premiums. This rotation to another job with no loss in pay will be another penalty to productivity.

The recommendations that will be made by the FMSI or the AIA are not known at this time. It is believed that the AIA stand will include background on medical information. However, it is most important that the individual companies make a response. They should not expect that someone else will write it for them. The Secretary will prepare a bulletin to be sent to the membership suggesting that they comment to OSHA on these requirements. It will be pointed out that the comments must be those of the individual member and they should not echo the suggested outline of problems which the Institute will prepare.

It was also pointed out that there are a lot of new items in the proposed regulations including items on loading, unloading and storing of asbestos cargo. The carrier--be it a railcar, ship or other--must make a visual inspection of the cargo and cargo space to determine if leakage or spillage of asbestos has occurred. Who does this? Does the carrier do this? Are the carriers aware of this problem? A close reading of the proposed OSHA standards revealed many problems of this nature which will have to be pointed out to others who may not feel that they are affected by the asbestos regulations.

THE EPA NATIONAL EMISSIONS STANDARDS FOR ASBESTOS

FMSI 06385

The Environmental Protection Agency published the amended standards for the National Emissions Standards for Asbestos. This appeared in the Federal Register October 14, 1975. Ordinarily the EPA amendments would be an item of prime concern to the manufacturers. However the proposed OSHA standards are so extensive and so far reaching they must take priority over these new EPA Standards. It was pointed out that the EPA notice is the adoption of the amendments to the standards. These are not proposed amendments.

In particular the waste disposal requirements are of interest to friction materials manufacturers. The friction materials manufacturer is responsible to see that land-fill operators and trucks carrying waste comply with the requirements of EPA on disposal of asbestos bearing materials. The manufacturer is responsible for supervision to see that these requirements are carried out.

Members reviewed the section 61.25 on waste disposal. There was some difficulty with interpretation. Mr. Weaver pointed out that the requirements for covering the asbestos containing material were applicable only if there were visible emissions to the outside air from the waste disposal site. In other words, if there were "no visible emissions" requirements (e)(1) and (e)(2)

of 61.25 do not come into play. However these requirements for cover do take effect if there are any visible emissions. The most difficult areas of the new EPA standard are in the waste disposal area.

There was no other business called to the attention of the committee. Upon motion duly made, seconded and unanimously passed it was

RESOLVED: To adjourn.

Adjourned: 2:15 PM

E. W. Drislane
Secretary