FRICTION MATERIALS STANDARDS INSTITUTE, INC., EAST 210 ROUTE 4, PARAMUS, NJ 07652

September 7, 1983

To: Health and Environmental Affairs Committee

Subject: EPA/OSHA Regulatory moves concerning asbestos

EPA OFFICE OF TOXIC SUBSTANCES (OTS) PLANS ON ASBESTOS

On August 22, 1983 I advised the Committee on a letter from the EPA's Office of Toxic Substances (OTS) concerning testimony on TSCA plans. I indicated that I would contact TSCA asking for copies of the testimony.

The testimony by Mr. Clay of OTS dealt with an update on TSCA responsibilities under Federal Law: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Toxic Substances Control Act (TSCA). In a section of his testimony, Mr. Clay discussed TSCA programs for existing substances, and in this testimony he commented on asbestos. A copy of his testimony on asbestos is enclosed.

Mr. Clay's cover letter was more specific in that he noted the asbestos-containing products which were under consideration for a ban, those being:

Roofing felt (both saturated and unsaturated)
Flooring felt
Asbestos felt-backed vinyl flooring
Vinyl asbestos floor tile
Asbestos cement pipe and fittings

Friction materials are notably absent, but this move under TSCA's authority to ban certain products could be a forerunner of actions to directly affect our industry. It is my understanding that any proposals in this asbestos area are targeted for mid-1984.

OSHA CONSIDERATION OF EMERGENCY RULE ON EXPOSURE TO ASBESTOS

I am enclosing copies of two articles that appeared recently on possible OSHA moves to install tighter limits on occupational exposure to asbestos in the workplace. This action may take the form of invoking an emergency temporary standard that would reduce the TWA exposure level to 0.5 fibers per cc--down from the current limit of 2 fibers.

Copies of the WALL STREET JOURNAL and OCCUPATIONAL SAFETY & HEALTH REPORTER articles on these plans are self-explanatory.

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The foregoing is sent as a matter of information.

E. W. Drislane
Executive Director

EWD/dr

FMSI 02627

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Testimony of Mr. Donald R. Clay of EPA's Office of Toxic Substances relating to Asbestos July 28 27, 1983

Asbestos has been the subject of OTS activities since the early years of the program. Recently, however, OTS has taken important steps toward consolidating its efforts toward asbestos and ensuring a coordinated approach by the various regulatory authorities concerned with this material. The establishment of an interagency Federal Asbestos Task Force to coordinate Federal efforts concerning asbestos has been a major achievement. The Task Force, which was established last year, is chaired by the Office of Toxic Substances, and includes representatives from OSHA and CPSC. Over the next year, my staff will be working with the Task Force to coordinate asbestos control.

In this regard, OSHA is working to strengthen its workplace standards for asbestos. Complementary to this activity, we plan to publish a proposed rule in the next year banning certain asbestos product categories and we plan to issue either an ANPR or a proposal which would establish a staged production cap on remaining asbestos uses. My staff is also pushing ahead this summer with a survey of asbestos in public buildings to assist us in determining the nature and extent of any problem with friable asbestos material in such places.

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