

Eaton
Axles & Brakes

Eaton Corporation
Axle & Brake Division
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December 12, 1983

Mr. A.G. Beier
Chief Engineer, Brakes/Wheels
International Harvester Truck Group Engineering
2911 Mayer Road
Fort Wayne, IN 46803

Dear Mr. Beier:

EATON

This letter is in response to your questions regarding the OSHA Emergency Temporary Standard on permissible asbestos fibers. Eaton Axle & Brake Division has been evaluating non-asbestos brake materials for some time. We feel, as you do, that asbestos will be eliminated from lining materials in the future. The "1/2 fiber" regulation in the emergency standard does not represent a problem for us, our concern is that OSHA may institute a more stringent regulation without allowing our industry sufficient time to develop and test new material.

To address your specific questions:

Question 1 and 2. Eaton Axle & Brake Division is in the process of preparing comments to submit to OSHA. While the final language has not yet been prepared, the basic content will be that we accept the necessity of the "1/2 fiber" regulation. Additionally, we will urge OSHA to provide our industry ample time to develop and test new materials prior to the initiation of more stringent regulations involving asbestos. At this time, we have not determined if we will request our government relations group to prepare testimony for the hearings.

Question 3. No, the proposed temporary standard does not present any problems in our producing or testing of brakes.

Telex 22-4305

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