

FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE #4, PARAMUS, N.J. 07652

December 30, 1975

To: Asbestos Study Committee

Subject: Draft Comments on Proposed Amendments to OSHA
Asbestos Regulations

I feel that the Institute must make a response to the proposed amendments to the regulations on occupational exposure to asbestos. I don't feel at this late date that it can be done by six committee members sitting down together, with six different feelings about various sections of the proposed amendments.

I have therefore drafted up the attached for review--correction--etc. by committee members. It is difficult to express thoughts to which all members will agree. I have tried to include comments relative to the friction materials business that I've heard expressed at meetings, at the seminar and read in the literature.

While I am not looking for wholesale changes (if everyone gives a different slant on each subject I will not know what to re-write) I would appreciate corrections of facts, or marginal notes (O.K. or N.G.) expressing approval or disapproval of sections as written. If I were to receive more than one objection to a section we might delete, or have time to re-write it. If you wish to add something, and you feel our industry supports such a comment, please submit it in relatively final form.

I would appreciate your help and will review this and any comments with your Chairman, Mr. Wagner. Any committee member who has knowledge of the AIA comments could help by seeing that our proposed comments are not at cross-purposes with theirs. I do not, however, wish to bring AIA in on this as our comments must be separate and distinct from those of AIA. If we parrot AIA we have lost credibility.

If you could reply to me on this by January 15, 1976 I believe the comments could be re-drafted for approval in time for commenting by February 9, 1976. Your cooperation will be appreciated.

E. W. Drislane
Executive Director

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