FRICTION MATERIALS STANDARDS INSTITUTE INC., E-210 ROUTE #4, PARAMUS, NEW JERSEY 07652

November 20, 1978

TO: ASBESTOS STUDY COMMITTEE

SUBJECT: REPORT BY OFFICE OF TOXIC SUBSTANCES (OTS) ON ASBESTOS

Several weeks ago, Mr. Ike Weaver of Raybestos-Manhattan, Inc. sent along a copy of an OTS review on their "Phase I Report on Asbestos." This was a draft of a report circulated within the Office of Toxic Substances prior to further discussion with other EPA offices.

Brake linings and friction materials were mentioned several times in the draft. In this draft, the OTS is considering various areas where asbestos can in some manner pollute the environment. In particular they mention the proposed Connecticut ambient air standards of 30 ng/m^3, and they indicate that there are levels of asbestos in many areas exceeding that level. Brake linings and friction materials are indicated as a source both for inhalation problems, and for ingestion (street sweepings discharged into streams).

They mention the controversy on the nature and amount of fibers emitted from friction products. The report mentions a National Cancer Institute study suggesting that fibers greater than 5 micrometers in length and less than 0.25 in width are carcinogenic. The problem with resolution of fibers smaller than 0.25 micrometers in width not being detected by optical microscopy complicates this question when an analyst is attempting to determine the fiber length. They do make a conclusion that use of the optical microscope for regulatory monitoring appears to be inadequate. If it were accepted that only fibers longer than 5 micrometers were carcinogenic, it would run counter to the Mount Sinai position that smaller (shorter than 5 microns and not detectable by optical microscopy) may be more lethal than the long fibers. Also, Mount Sinai studies of wear debris (brake drum dust) have indicated that only in rare instances have long chrysotile fibers been observed and that most are shorter than 0.4 micrometers in length.

There are sections in this report on epidemiological studies and a statement that asbestos induced cancers are related to the severity and duration of exposure.

Later in the paper it indicates that exposure may be significant in "auto supply stores," and I would imagine by this they mean from friction materials. The paper further indicates that if asbestos emissions from brake linings are considered significant, that the Toxic Substances Control Act (TSCA) might be used to control the asbestos content of brake linings, and to promote substitutes. They even suggested an interim step to require manufacturers to report any research results on asbestos substitutes.

I have not enclosed the appendix list of materials previously covered in the Kearney report on consumer products containing asbestos. This was to keep the enclosure to 30 pages. This report is sent for your information.

E. W. Drislane
Executive Director

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