

FRICTION MATERIALS STANDARDS INSTITUTE, INC.

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October 30, 1975

Docket Officer, Docket H-033
U. S. Department of Labor, Room N-3620
200 Constitution Avenue, N. W.
Washington, D. C. 20210

COPY

Gentlemen:

The Friction Materials Standards Institute is a trade association representing most of the domestic manufacturers of asbestos-containing brake linings and clutch facings. We also have many members in other parts of the world.

Asbestos is a material basic to the manufacture of brake linings and clutch facings. The proposed amendments to the regulations for occupational exposure to asbestos will require considerable study before a balanced response can be made thereto.

Our industry has been engaged in a serious and costly effort to reduce the asbestos concentrations in the work place to the 2 fiber/cc TWA limit to be effective July 1, 1976. This has been an awesome task, and the technology to move to this level is quite advanced. Our members do not even know what the technology will be to go to a 0.5 fiber/cc limit. It may be that the expensive equipment installed to get to 2 fiber/cc will have to be discarded for completely new technology.

Still further, our segment of industry is under two opposing regulatory forces. One is the National Highway Traffic Safety Administration pushing for more and more performance from brake linings. Standard 105-75 (Hydraulic Brake Systems) goes into effect on January 1, 1976. Standard 121 (Air Brake Systems) went into effect in 1975. The opposite force is the Occupational Safety and Health Administration and the Environmental Protection Agency who in effect are limiting our options for formulating and processing brake linings.

We ask you to consider the heavy impact on our industry and extend the date for comments to April 1, 1976. The December 8, 1975 cut-off date for comments will not permit a balanced responsible participation by our industry regarding these proposed regulations.

Respectfully,

FRICTION MATERIALS STANDARDS INSTITUTE

EWD/erc

E. W. Drislane
Executive Director

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