Exposure levels and other requirements should be based on protecting those with longer exposure. In other words, the data will be available on those exposed for longer periods of time. If the worker exposed for the longer period of time is protected, it is logical that those working for shorter periods are also protected.

9. INFLATIONARY IMPACT

In discussing items of this nature, the Institute does not have access to specific cost data. That is only available from individual manufacturers. The subjects of cost impact, competition, effects on employment, etc., are related to each other. The OSHA regulations will require considerable expenditures for equipment. In addition there will be continual additional costs of monitoring, respirator usage, productivity losses in use of regulated areas, recordkeeping and the like. Information on these costs must be collected from individual companies. The Institute would like to point out two items of concern to domestic manufacturers of friction materials.

9.1 There are fewer United States friction materials manufacturers in 1976 than in 1972-73

In our 1972-73 fiscal year, the Institute had 25 Active Members—those are manufacturers of brake lining or clutch facings resident in the United States. Today we have 19 members. Reasons other than OSHA regulations have contributed to this decline in domestic manufacturing. But there is no question but that some manufacturers were influenced in their decisions by earlier OSHA and EPA regulations. For reference,

FMSI 03261