

the Committee might assist the Members, but only six questionnaires were returned. Mr. Armstrong stated that he felt the Committee had responded to what he felt were the needs of the Members, but that there was little input from the Membership when the Committee solicited input.

In response to a question concerning asbestos as a hazardous waste, the Chairman stated that asbestos had been temporarily removed from the RCRA definitions of hazardous waste because it is controlled by the National Emissions Standards for Hazardous Air Pollutants (NESHAPS). There are indications that asbestos will continue to be controlled by NESHAPS rather than by RCRA. The Research Triangle Institute is studying this question under a contract from the EPA.

Comments were made concerning asbestos dust counts and other observations on asbestos emissions. It was stated that it would probably be in the best interests of the manufacturer that if sampling tests have been made which show that asbestos counts are within regulatory limits, it would be in that manufacturer's best interests to maintain those records. It may be advantageous to have documentation proving that sampling has been done, and that the tests showed compliance with regulations.

Upon motion duly made, seconded and unanimously passed, it was:

RESOLVED: To accept the report of the Health and
Environmental Affairs Committee as written.

FEDERATION OF EUROPEAN MANUFACTURERS OF FRICTION MATERIALS (FEFIM)

Mr. Carrigan introduced Mr. Robert Join, Secretary of the Federation of European Manufacturers of Friction Materials (FEFIM), of Paris, France. Mr. Join was asked to update the Membership on activities in Europe.

Mr. Join indicated that there continue to be two main areas of concern in Europe: (1) The approval of replacement brake linings for European vehicles where different from the original equipment linings, and (2) the asbestos health questions in the European Economic Community. Mr. Join indicated that there are ten European countries in the Community, but the Commission cannot pass laws. It can only write directives, and then it is up to the member country to put this directive into effect. The Commission recently drafted a directive on the protection of workers from exposure to asbestos. Mr. Join indicated that this most recent directive was most negative to asbestos, and while this is a draft directive at this time, a statement was made in that draft to the effect that the truly safe approach would be to ban asbestos. As regards exposure to asbestos from friction materials, it was recommended in the draft that asbestos use be stopped unless one could prove that the work environment was totally free from asbestos using electron microscopy. As electron microscopy could detect minute amounts of very fine asbestos, this is a most strict interpretation of an asbestos-free environment. It was stated that European countries are, of course, permitted to promulgate laws and regulations more severe than those proposed by the Commission, and this is now the case in Denmark.

In addition, Mr. Join indicated other Commission recommendations, such as 0.25 fiber crocidolite and 1.0 fiber chrysotile limits for asbestos exposure, additional medical surveillance rules, and questions as to whether garage workers