FILE NAME: Allied Signal Bendix (ASB)

DATE: 1989 Aug 31

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DOCUMENT DESCRIPTION: Letter from Bendix to NY State Dept of Environmental Conservation RE Renewal & Modification of Asbestos Emission Points

Bendix Friction Materials Division
P.O. Box 238
Troy, NY 12181

• 8/31/89
certified mail
• Received on 9/5/89

August 31, 1989

Mr. William J. Clarke
Regional Permit Administrator
Region IV
New York State Department of
Environmental Conservation
2176 Guilderland Avenue
Schenectady, NY 12306

Dear Mr. Clark,

This letter is in response to your letter dated August 1, 1989 regarding the renewal and modification of 41 asbestos emission points at the Bendix Friction Materials facility in Green Island. As we have discussed, the EPA asbestos ban prohibits manufacturing of asbestos containing friction materials for original equipment after August 25, 1993 (40CFR 763.165(c)) and for the aftermarket on August 26, 1996 (40CFR 763.165(d)). We have also indicated to the department on numerous occasions that the Green Island facility is predominantly an original equipment manufacturer with some aftermarket production. As a result, we wish to point out that the Term and Conditions of Permit paragraph one does not take in consideration the EPA aftermarket phase out time frame of August 26, 1996. EPA has long recognized the highway safety concern for the aftermarket which is reflected in the 1996 timetable to allow the natural conversion of the aftermarket due to vehicle turnover. In addition, we are actively researching non-asbestos alternatives for the aftermarket, and still may need the time frame specified by EPA to accomplish this task. As a result, we respectfully request that paragraph one of the Term and Conditions be amended to reflect the EPA timetable for the aftermarket. Paragraph one is suggested to read as follows:

"Bendix shall reduce total maximum permitted asbestos emissions from the entire facility from an estimated 5.73 TPY (July 1989) to approximately 1.2 TPY (August 25, 1993). This reduction will be accomplished through the elimination of asbestos containing friction materials for original equipment in 1994 or later model year motor vehicles.

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Bendix shall reduce total maximum permitted asbestos emissions from the entire facility from 1.2 TPY (August 25, 1993) to 0.0 TPY (August 26, 1996). This final reduction applies to aftermarket replacement parts in brake systems designed for use with asbestos containing friction products.

A schedule covering the amount of asbestos emissions reductions on a year to year basis covering 1989-1996 shall be submitted to the Regional Permit Administrator, New York State Department of Environmental Conservation, Region IV (DEC) for review and approval within 60 days of permit issuance. This schedule may be modified by DEC based upon the outcome of further analyses of air emissions and health effects as well as progress in meeting the 1996 deadline. Bendix shall submit to the DEC an annual report due July 1st of each year that indicates the amount of asbestos which has been emitted over the preceding year and planned reductions for the coming year. This report shall be accompanies by applications to modify those asbestos emission points which will be changed in order to effect the reductions on such emissions for the coming year.

In closing, I wish to reiterate that out strategy is to beat the EPA timeframe with considerable margin and will keep the Department informed of our progress per our agreement. If there are any questions, please contact myself or Tom Ragosta (270-0322)

Very truly yours,

Craig R Larson

Craig R. Larson, Manager
Health/Safety & Environmental Affairs

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NAPA RAYLOC
DIVISION OF GENUINE PARTS COMPANY
600 RAYLOC DRIVE, S.W.
P.O. BOX 43146
ATLANTA, GEORGIA 30378
PHONE 404 / 691-3780

June 24, 1991

Ms. Sheri Muncey
Bendix Friction Material Div.
Allied Signal
P O Box 2610
Cleveland, TN 37320-2610

Dear Ms. Muncey:

As the pressure and awareness of the problems with asbestos continue to grow, more controls must be initiated to comply with the requirements of the environmental agencies.

Your company has been advised in the past about our concerns with the dust in your packages. Some improvements have been made but it is imperative that we eliminate this potential hazard.

Our policy for all future shipments will be to inspect your product and package for dust. If dirt is prevalent, we will reject the shipment and return it, freight collect, for your rework. All purchase orders will reflect the requirement for "dust free parts and cartons".

Your immediate attention to this problem and a written response outlining your corrective action is anticipated and appreciated. If we can provide additional information, please advise.

Sincerely,

RAYLOC

Jack Hughes

Jack Hughes
Purchasing/Inventory
Control Manager

JH:jw

cc: Joe White
Tom Daniel
Henry Dunn
John George
Cherry Barker

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