

A "no visible emission" standard has been added to the transportation regulation.

The emission standard would measure only fibers longer than five microns. The justification for this seems to be the administrative convenience of avoiding difficulties in measuring fibers from .5 to five microns in length. Some medical evidence has indicated that the very small fibers may be the most dangerous. The Board will continue to examine the medical implications of the sub-five micron fibers and the means of measurement and control.

Part V, Sec. 501(a) - has been slightly changed from the proposed final draft to add the phrase "into the ambient air" in order to make clear that the emission standard does not apply to the in-plant atmosphere.

In Part V, Sec. 502 - the word "enclose" has been changed to "control" on the suggestion that as previously written the meaning was unclear and implied total enclosure of all facilities.

Our original proposal would have prohibited the use of brake lining in vehicles manufactured after January 1, 1975 and sold for use in Illinois. It was believed if brake lining decomposition emits asbestos fiber, then the tremendous number of vehicles using asbestos, and the impracticability of controlling these numerous small emission sources would appear to speak to the need for a product ban.

This proposal to ban asbestos brake lining has been dropped for the time being. While the evidence shows that brake lining decomposition is a significant source of background levels of asbestos, these ambient air levels are quite small and have not been shown to be a health hazard (although they have not been shown not to be). In addition, adequate alternatives to asbestos-lined brakes are not yet available, although closed braking systems, preventing the emission of asbestos dust, are possible. The Board will follow the medical and engineering aspects of this problem and possibly may return to it.

Finally, local governments are obliged to enforce these regulations, except for the manufacturing provisions. Much of the problem arises from numerous construction activities, and the Agency cannot adequately supervise these many emission sources. The "no visible emission" standard has been added especially to facilitate local government and citizen assistance in enforcement.

I, Christian Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion was adopted on the 6th day of January, 1972 by a vote of 4-0.

Christian Moffett