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FRICION PRODUCTS GROUP
Winchester

December 15, 1978

Mr. S. S. Conway, Jr.

Subject: Asbestos

In the spring of 1978 Joseph A. Califano, Secretary of Health, Education, and Welfare, launched a campaign to inform doctors, workers, and others about the risks of asbestos exposure. The information program for health professionals began in April 1978 with a letter to the nation's physicians from the U. S. Surgeon General. The campaign furthermore included television, radio, and print public service advertising. Additionally, about 40 million social security and other federal retirement beneficiaries have or will be receiving information with their checks. Efforts will also be made to use the labor and military press and similar specialty outlets.

This new public awareness campaign will also manifest itself in new regulations, such as that governing transportation of hazardous materials. As of April 30, 1979, domestic transportation of asbestos will be subject to a regulation which calls for pallets and shrink wrapping of pallet loads in addition to individually packed bales. The HEW public awareness campaign is now in progress but a similar campaign is being contemplated by OSHA. Should such a campaign be effectuated by OSHA it is a virtual certainty that we might be faced with exposure limits lower than 2 fibers per cubic centimeter. The probability of this happening is, however, somewhat remote at this time since OSHA, conforming with the President's guidelines, is anticipating severe budget restraints and personnel cutbacks in 1979. In addition to this, OSHA is currently expending all its energies on petitioning the benzene decision and its position concerning regulation of hazardous materials in the future very much depends upon the outcome of the benzene case.

Nevertheless, I believe it behooves us to formulate our thoughts regarding our posture as it concerns exposure limits lower than what we currently have. It is assumed that new regulations will call for a maximum of 0.5 f/cm^3 as compared to the current level of 2 f/cm^3 . Recognizing that 0.5 f/cm^3 is below our ability with current dust collection methods, it appears as if we have three alternatives:

1. Eliminate asbestos as a raw material.
2. Redesign our manufacturing processes to permit adherence to this standard.



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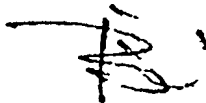
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3. Challenge the decision in court in order to either maintain the 2 f/cm³ or to buy us additional time for the purpose of developing new materials.

Since alternative number one still is not ready for application in all product lines and all part numbers, and since alternative number two will be prohibitively expensive, it appears to me that only alternative number three is viable. It is estimated that taking this issue to court may cost in excess of one million dollars. This cost can be split between the members of the Asbestos Information Association, thereby reducing the expenditure to each corporation to a maximum of approximately \$60,000.

Within the AIA the board of directors is currently doing its homework towards the implementation of this solution. However, should the limit be established at somewhere around 0.5 f/cm³, I need to have the authority to commit our corporation to this amount of money on fairly short notice.

As I said, this is only the contingency plan and, for the time being, it looks as if OSHA has its hands full with the benzene ruling. We might, therefore, have enough time to develop an asbestos-free formula for all product lines. Your immediate comments to the above will be sincerely appreciated.



B. Iwarsson

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