

Asbestos and The Friction Material Industry

comparison of the existing regulations with industry's position as stated in their input to the government prior to promulgation of the regulation, and compared with the recommendations of NIOSH and the OSHA Advisory Committee, will readily indicate that the existing OSHA standard, with the one serious exception of the two fibres per cc limit to be imposed in 1976, follows industry's position rather closely. If I appear to be defending the present OSHA Asbestos Regulations, it's only because I am very much aware of how much more strict these rules would be if the recommendations of NIOSH and the Advisory Committee had been followed. I doubt that many in the industry recognize or realize just how close they may have come to being regulated out of existence.

Future occupational safety and health legislation probably will rectify numerous inadequacies in present rules and may ameliorate some aspects of existing occupational safety and health standards. However, I seriously doubt that much relaxation if any is to be expected in regard to the Asbestos Regulations. I think the industry is going to have to mount a very determined effort to prevent these regulations from being tightened in the future.

The EPA regulations concerning ambient air control of asbestos are another matter. Although it was responsible for initially tagging asbestos as a hazardous pollutant, since doing so EPA has been much less diligent in pursuing its announced intentions toward regulation of the materials it declared hazardous. EPA first declared asbestos a hazardous air pollutant on March 31, 1971, and published proposed regulations December 7 of the same year. Hearings were held and much industry input was accepted and very deliberately reviewed by EPA before they finally issued the National Emissions Standard on April 6 of this year. This regulation was promulgated nearly a year later than called for under the requirements of the Federal Clean Air Act. For this EPA has been under considerable criticism ever since.

In addition to being late, the EPA standard is a lot less stringent than I or any other industry people, who have followed its development, expected. Nearly all the objections voiced by industry concerning the originally proposed standard were removed before they issued the final regulations. In addition, they modified some requirements to the extent that no one in industry expected, or even would have had the temerity to request, in meetings where these subjects were discussed between industry representatives and EPA.

In essence, the standard boils down to the following statement as far as emissions are concerned: There shall be no visible emissions to outside air from any asbestos mill or manufacturing operation except when a specified method of air cleaning, also part of the standards, is used before the emission escapes. In general, the air cleaning systems specified, filter asbestos emissions to the point that visible emissions, other than possible condensed water vapor, would not be produced anyway.