

While many serious difficulties are expected in achieving compliance with the new regulation by miners, textile manufacturers, and insulation fabricators and installers, it appears to me that most friction material manufacturing operations not relying on textile technology should have relatively little trouble, although some dry mold type friction operations may also pose problems.

Perhaps of a more serious nature is the potential threat of banning of asbestos in friction materials, particularly in automotive vehicles, to eliminate emissions from wear debris. It is doubtful that any further action in this direction will be taken until results of the comprehensive study by Bendix Corporation for EPA have been announced. I have been advised that this study, originally to have been completed this month, now is not expected to be finished until late this year.

Most of the difficulties that arose in this study to date have occurred in connection with the gas collection phase of the program. Since the study involves collection and analysis of gaseous emissions as well as particulates, precision rotary seals and gas collection systems had to be developed and evaluated, and this has necessitated extensive and time consuming engineering design efforts.

Another vital EPA program also is running behind schedule. That is promulgation of the permanent regulations and standards for asbestos emissions to the ambient atmosphere. I have been advised by the EPA Hazardous Pollutants Branch that the earliest date these standards are expected to be issued is the beginning of August, and they could be delayed until early September. However, no major changes are expected in the portions of the proposed regulation affecting manufacturing operations. Significant changes are expected in the sections applying to mining and spraying operations. Probably the only significant change between the proposed regulation and the expected final regulation as far as manufacturing operations are concerned is the broadening of specifications on fabric filters and wet dust collectors. This should be helpful to industry in permitting somewhat more flexibility in dust collector selection and application.

Before closing, I should like to recommend a few of my thoughts and suggestions that I have received from others concerning items that should be considered and reviewed by the Asbestos Study Committee during the following year.

1. Uniform interpretation of OSHA standards. Liaison with AIA/NA will be helpful in this.
2. Determination of technological feasibility of achieving both 2 and 5 fibres throughout the industry.
3. Determination of the overall effect on the friction material industry of the OSHA standards.
4. Development of guidelines, aids, and educational programs to help customers comply with the regulations.
5. Investigate a suitable standard method for analysis for asbestos in brake lining wear debris.
6. Develop methods and recommendations for safe disposal or recycling of friction material grinding waste.
7. Follow as closely as possible medical and occupational health research concerning asbestos and asbestos-related diseases and determine whether FMSI or its member companies should help sponsor or otherwise support work of this nature.