



**Research
Laboratories**

Bendix Center
Southfield, Michigan 48076
The Bendix Corporation

Dr. Joseph Breen
Project Officer
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, D.C.

April 7, 1978

RE: Report titled "Chemical Market Input/Output Analysis of Asbestos to Assess Sources of Environmental Contamination" prepared by W. M. Meylan, P. H. Howard, and S. S. Lande of Syracuse Research Corporation under EPA Contract No. 68-01-3224-Task III, for the Office of Toxic Substances, U.S. Environmental Protection Agency, Washington, D.C. 20460.

Dear Joe:

About three weeks ago Mr. Ike Weaver, Corporate Director for Environmental Control, Raybestos-Manhattan Corporation, sent to me for comments a portion (pages 98-100) of the above report which contained the summary and conclusions. The following were immediately noted:

- Point 10 on the middle of page 99 said that "Jacko and Ducharme (1973) produced samples of wear debris by means of laboratory simulation utilizing a car on a dynamometer, etc." This statement is in error. Our work utilized a car which operated in traffic on the streets of Detroit and the surrounding area.
- There are two important omissions - namely the work of Cooper and Murchio at the University of California at Berkley for the State of California Air Resources Board and the work of Johns-Manville (Spiel and Leineweber).

It was particularly disturbing that a current EPA contractor such as Syracuse Research Corporation had grossly misread the work of an earlier EPA contractor, and then concluded that others had analyzed real-life samples while ours were not. Apparently the authors also missed the fact that in addition to brake debris from the "mass balance" brakes enclosed in the collectors on the right side of the car, we analyzed a few samples of brake wear debris from the brakes on the left side of the car which were left alone (except for thermocouple instrumentation).

An Equal Opportunity Employer M/F

FMSI--0289

FMSI 03324



Page 2
Dr. Joseph Breen
April 7, 1978

During the last week of March, I called Mr. W. Meylan at Syracuse to inform him about the points which I outlined above and asked that he reconsider that portion of the report. In the meantime, Mr. R. Mereness of the Asbestos Information Association provided a complete copy (104 pages) of the draft of the report cited above.

While reading from Section 6.3 beginning on page 73 to the end of the report, I noticed many references to our work. In view of the error already mentioned, I carefully read pages 73-104, and soon became disgusted in the multitude of errors, omissions, and misrepresentations. Consequently, I started to "correct" as much as possible with the thoughts of writing a letter to you detailing all of the errors, omissions, and misrepresentations and suggesting improvements. However, such a letter would require too much time. Consequently, as a result of our telephone conversation on April 6, I am taking the liberty of sending to you my "red-pencil-marked-up-copy" which I trust will be passed on to the proper people who may consider my comments, corrections, and additions.

In addition, I am volunteering to review the revised draft of the report discussed above when it becomes available.

Thank you for your attention in this matter. If you have any further comments or questions, please feel free to contact me. I will maintain a continuing active interest in this research area.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Mike Jacko".

Michael G. Jacko

MGJ:rp

cc: C. M. Brunhofer, Bendix Friction
Materials Division
W. M. Meylan, Syracuse Research Corp.
R. Mereness, Asbestos Information Assoc.
I. Weaver, Raybestos-Manhattan
S. K. Rhee w/o attachment
G. T. Burton "
R. M. Rusnak "
R. T. Ducharme "
J. H. Somers " EPA, Ann Arbor
V. DeCarlo " EPA, Washington
✓ E. Drislane " FMSI

FMSI 03325