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August 23, 1985

Mr. John Riopelle
Allied Automotive
Bendix Friction Materials Div.
P. O. Box 238
Troy, NY 12181

Dear Rip:

I'm enclosing two items:

(1) Excerpt from minutes of the Membership Meeting this past June
(2) Copy of letter to OSHA of May 22, 1984.

The OSHA letter was prepared after a meeting of the Health and Environmental Affairs Committee on May 1, 1984. It was drafted in response to OSHA's proposals in the FEDERAL REGISTER of April 10, 1984. That, of course, was where OSHA had proposed two different exposure levels (0.2 fibers or 0.5 fibers).

You may recall that at the June 1985 Membership Meeting there was a recommendation that the Institute comment to OSHA on the proposed asbestos regulations. At that time I noted that we had responded with a formal well-thought out set of comments. The rejoinder to this was that because of changes in personnel at the regulatory agencies, that it would do well to either comment again or perhaps re-state our position. If re-stating our position, it was suggested that the Institute might comment further on substitute materials. And the last words of the minutes state:

> Mr. Riopelle was directed to review the May 1984 response to OSHA and have his Committee review the OSHA response for possible up-dating.

Please look this over, and give me a call at your convenience so we can figure some way to handle this.

Sincerely,

FRICTION MATERIALS STANDARDS INSTITUTE

E. W. Drislane
Executive Director

EWD/dr
Enc.

HEALTH AND ENVIRONMENTAL AFFAIRS COMMITTEE REPORT

Mr. John Riopelle, Chairman of the Health and Environmental Affairs Committee, presented his report. Refer to EXHIBIT 9.

Mr. Riopelle noted the activity last Fall with the Natural Resources Defense Council (NRDC) petition for the banning of the use of asbestos in automotive brakes, and the Institute comments to the EPA. He also noted that it appears there will be separate OSHA asbestos standards for manufacturing industries and the construction industry. He also noted that asbestos substitute materials were now generating data and he specifically referred to input on Dupont's Kevlar and on refractory (ceramic) fibers developed by Sohio Carborundum. Copies of these letters were given to the Secretary who will distribute copies to the attendees after the Meeting.

As regards OSHA regulations, Mr. Riopelle noted that there were several States that had stayed with the 0.5 fiber limit with respirators after OSHA adopted an Emergency Temporary Standard (ETS) in 1983. Among these States were Hawaii, Kentucky, Oregon, New Mexico and Tennessee. Several Members commented on the "Right to Know" laws adopted by several States, and it was stated that a Federal Law on the "Right to Know" will become effective in November 1985.

It was noted that the Institute had commented to OSHA on the proposed revisions to the asbestos standard in May 1984. At that time the Institute commented that the 0.2 fiber standard without respirator was not an attainable level. The 0.2 and 0.5 fiber limits with respirator might be achievable but the problem is enforcement of respirator requirements. It was suggested that the Institute comment to OSHA on possible enforcement of respirator usage during an interim transition period to the 0.5 level without respirator. The Secretary noted that the Institute had presented a documented position on the OSHA proposals in May 1984 and questioned a new response at this time. A Member stated that as with most regulatory agencies there are new people in the standards setting offices, and we could at least re-state our position as regards any changes in the exposure levels.

In any re-statement to OSHA, the Institute might add emphasis on the substitute materials and possible risks associated with them. OSHA should be informed that industry is working on the asbestos problem and that industry is concerned with the substitute materials. Mr. Riopelle was directed to review the May 1984 response to OSHA and have his Committee review the OSHA response for possible up-dating, if the Committee feels that is appropriate.

Upon motion duly made, seconded and unanimously passed, it was:

RESOLVED: To accept the report of the Health and Environmental Affairs Committee as written.