

FILE NAME: Brakes (BRK)

DATE: 1987 Oct 7

DOC#: BRK228

DOCUMENT DESCRIPTION: SAE Talking Points

October 7, 1987 SAE Talking Points

I Background

1979 ANPR

1982 8 (a)

Sept 84 NRDC petition

Dec 84 granted: Requested information, invited comment

II Jan 29 1986 PR

Life cycle approach, all asbestos, not just brakes

Provisions, incl. examples of options

Further response to NRDC petition: granted

Comments /////

----- Auto makers, brake manufacturers

Hearings /////

Opposed permits, could live with delayed ban

Some (many) substitute products available

Catastrophe if Agency forced premature substitution

Optimistic 5-year lead for OE

III ASME Report

OE - 5 years for most classes

Problem areas:

AM

Trucks: wedge brake blocks

medium trucks

off-road vehicles

Lack of stds for AM, safety issue

Some performance problems with some subs

Govt: Consider qualification of AM

Assess how well non-asb can be used to substitute
for asbestos in AM

IV Currently

Coordinating with DOT on regulatory options

DOT petition from American Trucking Assn -

Regulate AM tractor-trailer brakes

Updating support documents

Current industry trends

Auto industry - substitution

Brake industry - OSHA standard

Hazard of substitutes - Continuing to assess

Position - lesser hazard than asbestos

Development, selection of regulatory options; RIA November

Schedule July 1988