PLAINTIFF'S EXHIBIT
WV-06081

ASSBESTOS

MANUFACTURING

CORPORATION

(201) ARmory 8-6655

45 EAST 5TH STREET

PATERSON, NEW JERSEY 07524

QUALITY FRICTION MATERIALS SINCE 1918

Nov. 8, 1971

State of Illinois Pollution Control Board
189 West Madison Street
Suite 900
Chicago, Illinois 60602

PLAINTIFF'S EXHIBIT
11863.0

Att: Mr. Samuel T. Lawton

Gentlemen:

As a brake lining manufacturer whose product contains asbestos we are much concerned over the Illinois Proposed Ban on Asbestos in Brake Lining, particulated by Part VII, Section 702 from the regulations proposed by the Illinois Pollution Control Board.

Our company, and our industry as an entity, is definitely not interested in producing products which will have harmful emission effects in the atmosphere. But we do believe the above cited section of the proposed law does not have evidence to back up its severity---evidence that proves a harmful emission-factor as a result of/or because of the asbestos content in friction materials.

On the basis of reports of testing emissions we believe that although it is within the power of the State of Illinois Pollution Control Board to have asbestos banned from brake linings, we feel that to do so would eliminate an effective and useful brake lining component without justification.

We are certain that many of the emission tests have been forwarded to the Board, and that the Board is aware of the tests of emissions now being made by the Federal Environmental Protection Agency. We believe that this data will be most helpful in determining the effects of asbestos-emissions from use in brake lining, and will establish whether these emissions are of any danger or if they are negligible.

BRASSBESTOS
MANUFACTURING
CORPORATION

(201) ARmory 8-6655

45 EAST 5TH STREET
PATERSON, NEW JERSEY 07524

QUALITY FRICTION MATERIALS SINCE 1919

If the emissions prove to be a harmful pollutant our company will certainly support your Board in eliminating this hazard. But until reliable evidence supports this possibility we are reluctant to accept any unsupported position.

Our company has been producing brake linings since 1919. (The basic company was formed in 1917.) During this span of over 53-years we have produced hundreds of millions of feet of asbestos brake linings. In our process, we deal closely with raw asbestos fiber. Of course, we use protective measures in handling these materials---as well as other fine powders. We have never had, in our history, a case of asbestosis or any other asbestos-induced illness among any of our personnel.

We believe this record is not uncommon among brake lining manufacturers. We are aware of the fact that in other industries who use asbestos there are systems which do not control or contain the material. However, our chief concern is with the brake lining industry, and the effects in the atmosphere of the use of asbestos in brake linings. We believe that the asbestos is locked-into the brake lining material, and that during its normal usage the heat of the friction converts any residue into an inert non-fibrous material which will not be hazardous in nature.

We look to your Board for a full analysis of this matter, and a just decision based upon proved and repeatable data of a factual, non-emotional, nature.

Very truly yours,
BRASSBESTOS MFG. CORPORATION

WILLIAM SIMON
President

S:g

279