FRICTION MATERIALS STANDARDS INSTITUTE INC., E-210 ROUTE #4, PARAMUS, NEW JERSEY 07652

November 20, 1978

TO: ASBESTOS STUDY COMMITTEE

SUBJECT: REPORT BY OFFICE OF TOXIC SUBSTANCES (OTS) ON ASBESTOS

Several weeks ago, Mr. Ike Weaver of Raybestos-Manhattan, Inc. sent along a copy of an OTS review on their "Phase I Report on Asbestos." This was a draft of a report circulated within the Office of Toxic Substances prior to further discussion with other EPA offices.

Brake linings and friction materials were mentioned several times in the draft. In this draft, the OTS is considering various areas where asbestos can in some manner pollute the environment. In particular they mention the proposed Connecticut ambient air standards of 30 ng/m^3, and they indicate that there are levels of asbestos in many areas exceeding that level. Brake linings and friction materials are indicated as a source both for inhalation problems, and for ingestion (street sweepings discharged into streams).

They mention the controversy on the nature and amount of fibers emitted from friction products. The report mentions a National Cancer Institute study suggesting that fibers greater than 5 micrometers in length and less than 0.25 in width are carcinogenic. The problem with resolution of fibers smaller than 0.25 micrometers in width not being detected by optical microscopy complicates this question when an analyst is attempting to determine the fiber length. They do make a conclusion that use of the optical microscope for regulatory monitoring appears to be inadequate. If it were accepted that only fibers longer than 5 micrometers were carcinogenic, it would run counter to the Mount Sinai position that smaller (shorter than 5 microns and not detectable by optical microscopy) may be more lethal than the long fibers. Also, Mount Sinai studies of wear debris (brake drum dust) have indicated that only in rare instances have long chrysotile fibers been observed and that most are shorter than 0.4 micrometers in length.

There are sections in this report on epidemiological studies and a statement that asbestos induced cancers are related to the severity and duration of exposure.

Later in the paper it indicates that exposure may be significant in "auto supply stores," and I would imagine by this they mean from friction materials. The paper further indicates that if asbestos emissions from brake linings are considered significant, that the Toxic Substances Control Act (TSCA) might be used to control the asbestos content of brake linings, and to promote substitutes. They even suggested an interim step to require manufacturers to report any research results on asbestos substitutes.

I have not enclosed the appendix list of materials previously covered in the Kearney report on consumer products containing asbestos. This was to keep the enclosure to 30 pages. This report is sent for your information.

E. W. Drislane
Executive Director

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FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE 4, PARAMUS, N.J. 07652

B U L L E T I N

N O. 6 3 4

November 16, 1978

FRICTION MATERIALS WORK PRACTICES GUIDE

On September 12, 1978 we asked Active Members concerning interest in a "Friction Materials Work Practices Guide." This guide will be a small 5-1/2" x 8-1/2" or 6" x 9" booklet with 12 pages. It is aimed at the brake shops and medium size customers handling brake linings and clutch facings. The message has to do with good work practices and handling friction materials. In particular, it emphasizes that the worker should not use an air hose to blow dust from brakes and he should use the proper dust collection equipment if he is machining brake linings or clutch facings. It also has suggestions on respirator usage. Some of the suggestions in the booklet are in line with those made in a NIOSH Alert and in some cases quote directly from the OSHA standard for controlling asbestos in the workplace.

There are actually only five pages of text along with five illustrations opposite each page. The front cover has an illustration and of course the title. The rear cover indicate sources of additional information for some of the items mentioned in the text. This will be a professional booklet somewhat similar to a booklet which was put out by the Asbestos Cement Pipe Producers Association. It's usage is primarily in the brake shop as I indicated earlier.

Based on Member interest, we will order in quantities above 30,000, and based on that volume projection the booklet will be priced at 9¢ (U.S. $.09) per copy. We now have final copy and are ready for printing.

Would you please place your order for these booklets on:

Friction Materials Standards Institute
East 210 Route 4
Paramus, New Jersey 07652
U.S.A.

In order to expedite this shipment we are asking that you have your purchase order into the Institute Office by December 1, 1978.

EWD/erc
Distribution- Active Members-
List C
Regional Members
Licensees

E. W. Drislane
Executive Director

FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE #4, PARAMUS, N.J. 07652

B U L L E T I N

N O. 6 3 3

November 14, 1978

REGULATORY ACTIONS CONCERNING ASBESTOS

Over the past several weeks the Institute has received correspondence concerning activity by Federal regulatory agencies as concerns asbestos. Some of these activities are described in this bulletin.

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) DIRECTIVE AS CONCERNS EXPOSURE AND MEDICAL EXAMINATIONS

I have copied from an Asbestos Information Association "News and Notes" of October 31, 1978 concerning this subject. In essence, OSHA issued a directive to its Regional Administrators concerning compliance with the medical examination requirements of the standard. This is an attempt by OHSA to answer the question as to what consists of exposure to airborne concentrations of asbestos in the workplace. They are advising their Regional Administrators that concentrations of 0.1 asbestos fibers (or more) larger than 5 micrometers per cubic centimeter will be considered exposure to asbestos fibers. If these exposure levels are 0.1 or more, medical examinations are required.

You may wish to refer to the text as forwarded by the Asbestos Information Association.

CONSUMER PRODUCT SAFETY COMMISSION (CPSC) MEMORANDUM CONCERNING ASBESTOS IN CONSUMER PRODUCTS

Mr. Jim Reis of Johns-Manville sent along a Consumer Product Safety Commission memorandum concerning asbestos. This report based its recommendations on the Kearney report which was made to identify consumer products containing asbestos. In the Kearney review of products it was their conclusion that friction materials containing asbestos are not likely to be considered a consumer product because they are not under the jurisdiction of the Consumer Product Safety Commission. This CPSC memorandum concentrated in the areas of bulk asbestos fiber and dry mix texture paints containing asbestos for consumer usage. This report also discussed exposure to asbestos from ceilings and other structural surfaces. Friction materials were not marked for further Consumer Product Safety Commission study.

ENVIRONMENTAL PROTECTION AGENCY (EPA) REVIEW ON ASBESTOS

The Environmental Protection Agency's office of toxic substances has concluded a lengthy report on asbestos. Their concern with asbestos is any area where asbestos usage could affect environmental exposure by air, water or food. Brake linings were mentioned several times in the report as regards air and water exposure. There was no new epidemiological data as concerned asbestos exposure to friction materials workers. There were references to brake lining wear being a source of asbestos in ambient urban air, and it mentioned possible exposures to individuals from asbestos-containing products in automotive supply stores.

Towards the end of the report there was a comment to the effect that if monitoring determines that asbestos fibers are emitted from brake linings in significant amounts that the Toxic Substances Control Act could be used to control the asbestos content of brake linings and to promote safer effective substitutes. It noted that an interim step could be to require under the TSCA that manufacturers report any research results on substitutes. This report is in excess of fifty pages and it is being distributed to the Asbestos Study Committee for their review. If a member were interested in a copy of the complete report the Institute would be pleased to send one on request.

The foregoing items are sent along as a matter of information to the Membership.

E. W. Drislane
Executive Director

CC: Active Members - List C
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Regional Members (U.S. Dues)

FRICTION MATERIALS STANDARDS INSTITUTE, INC.

ASBESTOS EXPOSURE AND MEDICAL EXAMINATIONS

Matter of employers providing medical surveillance program as set forth in OSHA asbestos standard for occupational exposure to asbestos dust has been an unsettled subject for several months (N & N Feb.). At issue has been lack of clarification of the term "...exposed to airborne concentrations of asbestos fiber..." as it relates to requirement for medical examinations.

Both U.S. Court of Appeals for District of Columbia and Occupational Safety and Health Review Commission have ruled that current asbestos standard requires such examinations be provided employees exposed to airborne asbestos in any measurable concentration. These decisions related to a Jan. 1977 policy letter from OSHA to an individual employer which stated medical examinations would be required only when employee exposures to airborne asbestos exceed 0.1 f/cc. A three-member OSHA panel was designated by Asst. Secretary of Labor (OSHA) Eula Bingham to study problem. AIA/NA requested OSHA in Mar. 1978 to provide workable and reasonable interpretation at earliest possible date.

On Oct. 11,1978, OSHA issued Program Directive #300-16 to its regional administrators providing uniform inspection and compliance procedures for medical examination requirements of the asbestos standard. Principal actions in this directive are:

- The term "exposed to airborne concentrations of asbestos fiber.." is administratively interpreted to mean "exposed to a minimum of 0.1 asbestos fibers larger than 5 micrometers per cubic centimeter of air..."
- Medical examinations will be required for any 7 to 8-hour time-weighted average concentration of 0.1 f/cc, or for a greater concentration.

An OSHA spokesman has advised that agency's Oct. 11 directive is considered internal policy and, further,directive does not amend the asbestos standard, but rather provides an administrative interpretation of the standard for use by compliance officers.

FMSI 06973

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