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Members' Re: Illinois PCB.

BULLETIN

NO. 416

October 28, 1971

PROPOSED ILLINOIS BAN ON ASBESTOS IN BRAKE LINING

There has been considerable activity by members of the Asbestos Study Committee as regards the proposed Illinois regulations on "Asbestos and Spray Insulation". To quote from Part VII, Section 702 of the regulations proposed by the Illinois Pollution Control Board:

> "The use of asbestos in the brake lining of vehicles manufactured after January 1, 1975, and sold for use in Illinois is prohibited."

In the Board's explanation it notes that the prohibition is worded to avoid the necessity of fitting vehicles manufactured prior to 1975 with "non-asbestos" brakes. However, there is no question but that the ban includes original equipment linings, and there can be little doubt but that replacement linings on these vehicles must also be of a "non-asbestos" type. Further, interpretation of the proposed regulations indicates that all vehicles are included: Passenger Cars, Trucks, Off Highway Equipment, Farm Tractors and the like. Also, the Board apparently considers "clutch facings to be the same as brake linings". While the immediate effect would be on those supplying original equipment linings, the secondary effect would be felt by all friction material manufacturers.

In the Board's explanation they state: "These prohibitions have been made with full consideration given to the available alternative materials."

From the Illinois hearings this past month, the Institute has received several articles of interest:

(1) Johns-Manville memorandum, October 20, 1971, by Mr. Swetonic summarizing the Chicago hearings on October 15, 1971.

(2) Written presentation by Dr. F. Pundsack of Johns-Manville as given at the Chicago hearings.

(3) Dr. W. J. Nicholson, Mt. Sinai Hospital, a presentation in support of the Board's regulations, at the Chicago hearings.

(4) Chicago Sun-Times October 18, 1971 report on the Chicago hearings.

(5) Waukegan newspaper report of October 20, 1971 concerning the hearings in Waukegan.

(6) Johns-Manville memorandum, October 20, 1971, by W. Raines summarizing the Waukegan hearings on October 19, 1971.

Attached to the delegates copies only of this Bulletin are excerpts:

(1) Entire J-M summary of the Chicago Hearings.

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PLAINTIFF'S EXHIBIT WV-06014

PLAINTIFF'S EXHIBIT 11820

(2) Entire J-M summary of the Waukegan Hearings.

(3) Pages 20, 21 of Dr. Pundsack's presentation at the Chicago Hearings.

All those who have appeared at the hearings feel it is most urgent that the brake lining manufacturers advise the Control Board of their position on this proposed ban. It has been learned that the Control Board was surprised over the lack of response to the brake lining ban from friction material manufacturers.

Realizing the unreasonable deadline you must work against, comments should be in the hands of the Pollution Control Board by November 10, 1971. Please write:

Mr. Samuel T. Lawton
State of Illinois Pollution Control Board
189 West Madison Street
Suite 900
Chicago, Illinois 60602

The comments must be your own. We suggest that the primary force of these comments might be the lack of availability of known substitutes at this time. A secondary point might be that the Federal EPA (Environmental Protection Agency) is currently having studies made concerning the extent of emissions in the general environment from brake linings, and these results will not be known till mid 1972. Unless you have specific medical background, we suggest you not question the proposed safety standards on asbestos concentrations. Further, as is the case with most government bureaus, any pleading on cost or economics should be avoided. Please note that the portion of the proposed regulations that we are concerned with at this time is the general environment from brake lining emissions on vehicles in use. While the in-plant environment is also covered in the proposed regulations, we are advising our members primarily on the proposed ban on brake lining on vehicles.

Should you write Mr. Lawton, it would be appreciated if you would send a copy to the Institute. If there are any questions, please give me a call.

E. W. Drislane
Executive Secretary

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