FILE NAME: Friction Materials Standards Institute (FMS)

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DOCUMENT DESCRIPTION: Letter from FMSI to the EPA Attn: Don R. Goodwin RE Proposed Amended Standards for Asbestos

FRICTION MATERIALS STANDARDS INSTITUTE, INC.
BERGEN MALL OFFICE CENTER
E. 210 ROUTE 4
PARAMUS, N. J. 07652

December 3, 1974

Emissions Standards and Engineering Division
Environmental Protection Agency
Research Triangle Park
North Carolina 27711

Attention: Mr. Don R. Goodwin

Gentlemen:

The Friction Materials Standards Institute, Inc. is a trade association representing most of the manufacturers of brake linings and clutch facings in the United States, and we serve several manufacturers outside of the United States.

We wish to comment on the proposed amendments to the National Emissions Standards for asbestos, as published in the Federal Register on October 25, 1974. There are items in these proposed amendments which will have considerable impact on customers of our members (fabricators of friction products) and on land-fill operators who provide our members with waste disposal services.

61.22 (h) (2) Inclusion of fabricators of friction products in the requirements of the emissions standards

While we can understand the Administrator's reasons for including fabricators of asbestos friction products in the emissions standards, we do not feel that these fabricators are sufficiently aware of the impact of these proposed amendments on their operations, particularly in the waste disposal area. We feel your December 5, 1974 cut-off for acceptance of relevant comments was too early to get satisfactory input from those most affected by the proposed amendments. We suggest that this paragraph be postponed until fabricators of friction products have the opportunity to consider the impact of these proposed amendments on their operations.

61.22 (1) (2) The requirement for warning signs on inactive waste disposal sites

This affects individuals and companies who service our members. There may be a reaction on the part of such operators which could make waste disposal sites unavailable to both manufacturers and fabricators. Many operators and developers plan their land use with the intention of later re-sale. These warning signs could be required forever on inactive waste disposal sites and this would effectively remove them from future development. We recommend this requirement for warning signs at inactive waste disposal sites be reconsidered.

Sincerely,

FRICTION MATERIALS STANDARDS INSTITUTE

EWD/lmc

E. W. Drislane
Executive Director

PLAINTIFF'S EXHIBIT
NO. BX-107

MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE

BULLETIN

NO. 516C

December 4, 1974

PROPOSED AMENDMENTS TO EPA EMISSIONS STANDARDS

I issued earlier Bulletins 516, 516A, and 516B concerning the proposed amendments to the EPA emissions standards. While we had a few verbal comments on these calls there was no written comment sent to the office that we could incorporate letter to the EPA.

cut-off date for comments was December 5, 1974. After discussion with Mr. I. H. , Chairman of our Asbestos Study Committee, I prepared the attached memo to and sent it on its way yesterday.

Addition to the waste disposal problem, an area for concern is that some of your users ("fabricators" in the proposed amendments) who do subsequent drilling, grinding or cutting of friction materials are covered by these proposed revisions the national emissions standards.

1. When an assembler grinds or drills or cuts
2. When a debonder burns off the linings
3. When any assembler, debonder or other disposes of friction material waste.

Without any comments from the manufacturers or fabricators, these proposed amendments will become the standards. If your customers are not aware of the problem, perhaps they, or the EPA, will fault the manufacturers for not having alerted them.

The following notices in the Federal Register cover these national emissions standards for asbestos:

April 6, 1973	National Emissions Standards
May 3, 1974	Clarifying Revisions
October 25, 1974	Proposed Amendments

If you wish a copy of any of these notices, we will be happy to send you a copy. In the meanwhile, it is felt that your customers who do subsequent work on these products should be advised on the scope of these proposed amendments.

EWD/erc
Enclosure:

E. W. Drislane
Executive Director

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