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Asbestos Study Group

bcc: Mr. C. J. Weber
Mr. C. R. Miller
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Mr. E. W. Drislane - FMSI

Enc

November 4, 1971

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

Dear Mr. Lawton:

As a manufacturer of brake lining, it came as a complete shock to World Bestos Company, Division of The Firestone Tire & Rubber Company, to learn of the proposed 1975 restriction of the use of asbestos in the brake lining of vehicles sold for use in Illinois.

For such a widely affecting regulation to have been proposed must have been based on a substantial amount of damning evidence of an unequivocal nature. We would like to be supplied a list of references or still better copies of all scientific data upon which the proposed regulation was based or used as support so that we can make our own analysis of said data and begin our alternative research program immediately.

If these studies for which the regulations were based upon are indeed scientifically reliable, then a three year waiting period is in question. Can you explain how the three year figure was arrived at and the thinking and reasoning for such a delay and grace period?

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NO. BX-15

We would also like to have made available that information regarding suitable available alternative materials and the test data clearing these materials. Further, we would like to see the available data which supports the alternative materials in brake lining tests such as Department of Transportation vehicle tests and pertinent indoor Dynamometer tests.

We should like to say that references which we have seen and are aware of do not suggest that brake lining emissions constitute any known health hazard. Therefore, we feel that the proposed regulation will not accomplish in fact its intent (that is, to reduce asbestos levels in ambient air) through such an enactment.

In conclusion our observation at the present time is that the proposed regulation may be based on unsupported and insufficiently comprehensive data to warrant such extensive action by the State of Illinois.

Very truly yours,

WORLD ASBESTOS COMPANY

James C. W. Honning

James C. W. Honning
Manager, Technical-Research

JCWH:lka
Attachment