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

BULLETIN

NO. 516C

December 4, 1974

PROPOSED AMENDMENTS TO EPA EMISSIONS STANDARDS

We have 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 proposals there was no written comment sent to the office that we could incorporate into a letter to the EPA.

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

In addition to the waste disposal problem, an area for concern is that some of your customers ("fabricators" in the proposed amendments) who do subsequent drilling, grinding or cutting of friction materials are covered by these proposed revisions to 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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(6)

TELEPHONE (201) 845-0440

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 (l) (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

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

BULLETIN

NO. 516B

November 15, 1974

PROPOSED AMENDMENTS TO EPA EMISSIONS STANDARDS

On October 29, 1974 and November 5, 1974 we issued Bulletins 516 and 516A concerning the proposed amendments to the EPA Emissions Standards. The impact of these proposed amendments may not be fully understood, but they are quite far-reaching, and they may create problems in the solid waste disposal area.

FENCING

First, I must correct Bulletin No. 516A, where it stated that "--- all such sites must be fenced."

1. In the case of active waste disposal sites, fencing is not required provided 6" (15cm.) of compacted non-asbestos containing cover is applied at least once every 24 hour period.

2. In the case of inactive waste disposal sites, fencing is not required provided:

   (A) 6" (15cm.) of compacted non-asbestos containing cover is applied with a cover of vegetation, or

   (B) 2' (60cm.) of compacted non-asbestos containing cover is applied without a vegetation cover.

"NO VISIBLE EMISSIONS"

The proposed standards state "no visible emissions" during the disposal - collecting, packaging, transporting or dumping (unless either the specified wetting or pelletizing methods are used).

Where they say "no visible emissions" at the disposal site, they interpret this to mean not just the borderline but anywhere in the dump.

DE-BONDING OPERATIONS

De-bonding operations by re-builders are considered fabricating operations and the materials removed must be disposed of in accordance with the procedure for manufacturers and fabricators. The re-builders with de-bonding operations are fabricators and it is proposed that they be covered.

THE EXCEPTION FOR BRAKE SHOE RADIUS GRINDING

FMSI 06721

Where the EPA is making an exception (ie, not covering) brake shoe radius grinding, that is only when brake shoe radius grinding is done at the garage or shop actually installing the shoes on a vehicle. Where brake shoe radius grinding is done by a manufacturer or fabricator, that operation is not an exception.

WASTE DISPOSAL SITE SIGNS - INACTIVE SITES

There will be a problem where a site has been filled by a developer and the inactive site must have Asbestos Waste Disposal Sign posted thereon. This may make it difficult for a developer to market the property and in turn make it impossible for a manufacturer or fabricator to use this disposal site.

ACTION

There are many problems for asbestos friction materials manufacturers with these proposed amendments, particularly on disposal of solid waste. It is suggested that the Standards (sent with Bulletin 516) be reviewed by those responsible for asbestos control in the factory, and that comments be sent (in triplicate), not later than December 5, 1974, to:

Emissions Standards and Engineering Division
Enviornmental Protection Agency
Research Triangle Park, North Carolina 27711
Attention: Mr. Don Goodwin.

If you need additional copies of the proposed amendments please let me know. If you would rather have FMSI respond, please send your written comments to the Institute to arrive no later than December 2, 1974.

EWD/erc
cc- Delegates, Alternates
Asbestos Study Committee

E. W. Drislane
Executive Director

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

BULLETIN

NO 516 A

November 5, 1974

PROPOSED AMENDMENTS TO EPA EMISSIONS STANDARDS

On October 29, 1974 we issued Bulletin No 516 concerning the EPA Emissions Standards and we sent one copy of the notice as it appeared in the Federal Register to one person for each Member. Mr. I. H. Weaver, Chairman of our Asbestos Study Committee, has condensed the more important items of concern to friction materials manufacturers and his comments follow:

It is proposed to extend coverage of the standard to fabrication of friction products, except those operations that primarily install asbestos friction materials on motor vehicles. Brake shoe radius-grinding is specifically excepted in the rationale on Page 38065.

Waste disposal requirements are spelled out in considerable detail. It appears that if there are no visible emissions with existing waste disposal methods, no change will be required. However, if existing methods entail visible emissions, then one or the other of two alternates must be pursued:

a. Wetting with water and sealing the wetted waste into impermeable containers labeled to provide notice that a hazardous material is contained, and depositing the filled containers at a disposal site,

b. Pelletizing into non-friable pellets and depositing at a disposal site.

Incineration of containers such as paper or plastic bags that previously contained asbestos will be prohibited.

Warning signs will be required at waste disposal sites to alert the public of the potential asbestos hazard, and all such sites must be fenced.

In the event there are visable emissions from waste disposal sites, one of the following alternates must be followed:

a. Cover with 15 centimeters of non-asbestos-containing material, and establish cover of vegetation adequate to control erosion.

b. Cover with 60 centimeters of non-asbestos-containing material and maintaining such cover in an erosion-free condition.

EWD/erc
cc-Delegates, Alternates
Asbestos Study Committee

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. 5 1 6

October 29, 1974

PROPOSED AMENDMENTS TO EPA EMISSIONS STANDARDS

On October 25, 1974 the EPA published proposed amendments to their National Emissions Standards. To avoid confusion: these are EPA proposals (not OSHA). They concern the requirements of "no visible emissions" into the environment.

While these proposed amendments are concerned primarily with the demolition and removal of "friable asbestos materials", there are at least two proposals affecting the friction materials business.

One is that fabricators of friction products (such as re-builders) would come under the provisions of these regulations, whereas currently the manufacturers are covered. A more important item is that proposals are made in the solid waste disposal area which should affect all manufacturers.

A copy of these proposed amendments for your company is being sent to:

The foregoing is for your information.

EWD/erc
cc-Delegates, Alternates
Asbestos Study Committee

E. W. Drislane
Executive Director