

Eaton
Axles & Brakes

Eaton Corporation
Axle & Brake Division
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December 12, 1983

Mr. A.G. Beier
Chief Engineer, Brakes/Wheels
International Harvester Truck Group Engineering
2911 Mayer Road
Fort Wayne, IN 46803

Dear Mr. Beier:

EATON

This letter is in response to your questions regarding the OSHA Emergency Temporary Standard on permissible asbestos fibers. Eaton Axle & Brake Division has been evaluating non-asbestos brake materials for some time. We feel, as you do, that asbestos will be eliminated from lining materials in the future. The "1/2 fiber" regulation in the emergency standard does not represent a problem for us, our concern is that OSHA may institute a more stringent regulation without allowing our industry sufficient time to develop and test new material.

To address your specific questions:

Question 1 and 2. Eaton Axle & Brake Division is in the process of preparing comments to submit to OSHA. While the final language has not yet been prepared, the basic content will be that we accept the necessity of the "1/2 fiber" regulation. Additionally, we will urge OSHA to provide our industry ample time to develop and test new materials prior to the initiation of more stringent regulations involving asbestos. At this time, we have not determined if we will request our government relations group to prepare testimony for the hearings.

Question 3. No, the proposed temporary standard does not present any problems in our producing or testing of brakes.

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Question 4. There are a series of tests required to evaluate lining materials properly. These tests range from simple laboratory tests to elaborate dynamometer tests and long duration vehicle tests. Foundation brake manufacturers typically have worked with the lining suppliers to develop the total spectrum of brake and lining performance evaluations. It will take us a minimum of 3 months just to conduct certification testing over the entire range of brake hardware sold for a single new lining. While some of the other tests such as wear, water fade, noise, FAST or LST do not need to be run for every brake hardware configuration, the total time required will be considerably higher and dependant upon the resources and commitments from the lining suppliers.

Question 5. Eaton Axle & Brake Division is willing to go on record to challenge a more stringent standard in order to provide our industry ample time to convert to new materials. Whatever amount of time the industry as a whole requires to effectively accomplish this, we will support it.

We are continuing to seek additional information regarding this issue and would be more than happy to share our findings with you.

T.W. O'Boyle
Marketing Manager

W.W. Hoenes
Product Engineering Manager

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