

Eaton Corporation
Axle & Brake Division
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J. Blank

October 15, 1986

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FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

Mr. Tom Paver
Peterbilt Motors Company
38801 Cherry St.
Newark, California 94560

Subject: Asbestos Brake Linings

Dear Tom:

As you may be aware, the O.S.H.A. standard for airborne asbestos fiber permitted in the workplace has been reduced significantly by a recent court ruling. This level has dropped from 0.5 to 0.2 fibers/cc. Both Carlisle and Abex have notified Eaton of their intent to cease manufacture of asbestos based products. These letters are attached.

Abex and Carlisle have chosen different dates to stop production of asbestos products. Abex will stop on 1/1/88. Carlisle will stop shipments on 7/1/87. The Carlisle letter is misleading in that they intend to stop actual production on 11/17/86. Shipments between 11/17/86 and 7/1/87 will be made from stockpiles manufactured prior to 11/17/86.

While non-asbestos linings have been approved by Eaton to replace most asbestos materials, replacements for high friction materials have, to date, been unsuccessful at passing all qualification requirements. While new materials for these applications have been surfaced by the lining suppliers, they are untested. Eaton is attempting to implement the following program with the cooperation of the lining suppliers:

- A. Establish a supply of current low and medium friction asbestos materials to assure uninterrupted product flow to vehicle manufacturers based on 1986 purchase volumes:

Abex - 551C, 551K supply to 1/1/88
Carlisle - MMD39A, supply to 7/1/87 by stockpiling

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This requires creation of brake assembly part numbers by the vehicle manufacturers to replace all assemblies currently using these materials. This must be done in a timely manner to permit production changeout by the dates indicated above.

- B. Establish a supply of high friction asbestos material to assure uninterrupted product flow for applications where approved NAB materials cannot be used, for a time period sufficient to allow testing of a suitable replacement material. Again these will be based on 1986 volumes:

Abex 551D supply to 1/1/88

Carlisle MM8C5, 262E supply to 1/1/88 by stockpiling beyond Carlisle established date. If Carlisle refuses to stockpile to this date, a necessary alternative may be the temporary substitution of Abex high friction asbestos lining.

This program requires the identification of critical applications using Carlisle materials by 11/1/86 to permit stockpiling. It then requires an intensive approval test program on new, high friction non-asbestos materials and O.E.M. release of part numbers in time for a production changeout by 1/1/88.

To minimize the time required to implement the above program, the brake assembly part numbers and volumes purchased by your organization thus far this year have been identified. By categorizing these components by lining material and brake size, and reviewing current approved applications, this list can be broken down into seven categories:

- "0" - Non-asbestos brake assemblies, no action required.
- "1" - High friction Carlisle products with applications suspected as requiring a new, not yet approved NAB material. These part numbers should be reviewed by your organization immediately. Please contact me with application data (GAWR, rolling radius, chamber size and slack length) to confirm that additional stockpiling must be completed, by 11/1/86. Note: If a larger chamber size can be used, a medium friction NAB material may suffice.

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- EATON**
- "2" - Low and medium friction Carlisle products that can be replaced by currently approved NAB materials. Please contact me with your intentions and timing to replace these part numbers for a 7/1/87 production changeout.
 - "3" - High friction Abex products with applications suspected as requiring new, not yet approved NAB materials. No immediate action is required. Please review the applications of these part numbers. Contact me with your requirements for assistance to release new NAB materials for a production changeout of 1/1/88.
 - "4" - Low and medium friction Abex asbestos products that can be replaced by currently approved NAB products. No immediate action required. Please identify your requirements for the creation of replacement part numbers for a 1/1/88 production changeout.
 - "5" - BSI asbestos linings, no indication from supplier as to requirements for a production phase out.
 - "6" - Brake assembly part numbers where application information is unidentified in Eaton records. Please review immediately and supply vehicle parameters that will allow judgment as to which category above in which they should be included. If category "1" is identified, these volumes must be included in stockpile numbers.

If the above program does not suit your company's requirements, please notify us as quickly as possible.

Sincerely,


Larry W. Hopper
Account Manager

cc: Cal Burgin	J. Clark
Steve Vanderlip	T. Furdek
Don Wilt	L. Hopper
Joe Neff	R. Young

LWH/MB
(21235)

Enclosure