

The friction materials industry is not the vinyl chloride industry. We do not say the exposure limits cannot be met. But this industry has been working under regulatory requirements for a longer time and has a better feel for what can be accomplished and what is feasible. At this time, our industry does not know if it can meet the new limits--it will have a better handle on what is feasible after the July 1, 1976 start-up date for the 2 fiber/cc limit.

2. MONITORING - EMPLOYEE NOTIFICATION

It is felt that bulletin board notification of employee's exposure would serve the intent of "...shall notify each employee in writing..."

3. WORK PRACTICES

The friction materials business is under regulatory surveillance by the National Highway Traffic Safety Administration (NHTSA). An Air Brake Systems Standard (Standard 121) took effect in 1975. The Hydraulic Brake Systems Standard (Standard 105-75) took effect on January 1, 1976. Brake lining is an essential part of all brake systems, and our manufacturers cannot change formulation or processing methods without considerable additional testing on their part, as well as by brake systems manufacturers and vehicle manufacturers. Certain friction materials have superior performance characteristics when manufactured using dry methods. Processing changes are easier in an unregulated industry, and OSHA should understand that the friction materials industry must conform to these other regulations. The brake lining industry is caught between the forces of "more performance" on the one hand, with more limited options in manufacturing methods on the other.