Abex

An IC Industries Company

Abex Corporation
Friction Products Group
Suite 205
1650 West Big Beaver Rd.
Troy, MI 48084
(313) 643-4400

November 7, 1975

C & M Axle Division
P.O. Drawer 9269
Highway 80 West
Montgomery, Alabama 36108

Attention: Mr. W. Kroell

Dear Sir:

Have you been alerted to the Department of Labor Docket #H-033 which appeared in the October 9, 1975, Federal Register?

This proposed revision to OSHA Asbestos Standard (29CFR1910.1000) covers a broad field, such as adequate cautioning to users of asbestos, employee information and training, signs and labels, medical records, etc.

The present level of asbestos exposure is five (5) fibers per cubic centimeter. On July 1, 1976, the limit will be dropped to two (2) fibers per cubic centimeter. We already meet or exceed this level at our various plants and consistently support improved regulations for the health and safety of our employees.

We are concerned about many of the individual proposals covered in Docket #H-033. However, our primary concern is with the proposed reduction to .5 fibers per cubic centimeter. This is such a drastic reduction that we feel you should be alerted to the far reaching effects such a regulation would have on your business.

At this time, we simply do not know if .5 fibers per cubic centimeter is attainable. Considerable investigation and time will be required to determine this. We must proceed cautiously. If the industry determines that .5 fibers per cubic centimeter is unattainable, it could mean the demise of the asbestos friction material industry.

Over 95% of the automotive applications in the United States today use asbestos friction materials. The implications of the possibility of shutting down our transportation system are very real. We feel that utmost caution must be used by this potentially over-zealous regulatory agency in establishing any new asbestos fiber limit.

A copy of the proposal is attached for your information and use in the preparation of an urgent response. An expression of your concern is specifically requested to be submitted in quadruplicate to the:

VPD-153-0000975

DANA-322