EXHIBIT NO. AB-9

REPORT ON FMSI ASBESTOS STUDY COMMITTEE ACTIVITIES

The Asbestos Study Committee was formed July 1971 with the assigned purpose to review and comment on rules and regulations promulgated by state and federal governments concerning asbestos and its applications.

The first Committee meeting was held September 15, 1971 and was chaired by Dr. E. P. Stef of Raybestos-Manhattan, with members from Worldbestos, Abex, Bendix, and Carlisle Corporation and J-M present. The following items were reviewed and/or discussed: (1) Relationship with Asbestos Information Association/North America. (2) Proposed Illino Regulations. (3) Vehicle friction material emission test program to be conducted by Bendix under EPA contract. (4) Monitoring for airborne asbestos fibre. (5) Distribution and circulation of literature on Asbestos/Health subjects.

The purpose of the Asbestos Study Committee was restated as follows: "to gather and dessiminate to its members information about pending regulations concerning asbestos in the work place (occupational exposure) and in the general environment(particulate emissio and to draft comments relative to proposed regulations in defense of reasonableness."

The following is a list of the actions taken by the FMSI Executive Secretary on behalf of the Asbestos Study Committee during the remainder of 1971:

September 30 - Issued minutes of first Committee meeting with letter commenting on proposed Federal EPA and Illinois emission standards.

October 28 - Issued bulletin and further information on Illinois hearings.

November 10 - Issued information on membrane filter monitoring method.

November 14 - Issued bulletin on revisions to Illinois and Federal EPA proposals.

December 8 - Issued information concerning final draft of proposed Illinois regulation, proposed EPA emission standards, and Federal Department of Labor Regulations on Occupational Exposure.

On January 26, 1972 arrangements were announced for Bill Reitze of J-M to conduct an instruction session on asbestos fibre monitoring at FMSI headquarters February 10. On February 10 this session was presented to nine attendees representing six member companies.

The second Asbestos Study Committee meeting also was held on February 10 with I. H. Weave Raybestos-Manhattan, acting as chairman and members representing Worldbestos, J-M, Bendix and Carlisle attending. The following items were covered:

1. Review of AIA/NA comments regarding OSHA meeting in Washington on January 26.

2. Review of proposed OSHA asbestos standard and comparison with British standards and regulations.

3. Review of British Friction Material Council comments on Illinois standards. It was resolved to forward to BFMC copies of minutes of future FMSI Asbestos Study Committee meetings.

4. Recommendation made that the FMSI Asbestos Study Committee maintain close liaison with AIA/NA.

5. Reviewed background and expected thrust of OSHA and EPA regulations.

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6. Reviewed monitoring equipment and methods.

7. Recommended future course for Asbestos Study Committee.

The following is a summary of actions taken by the Executive Secretary during the first half of 1972 in regard to Asbestos Study Committee matters:

February 18 - Circulated Bulletin 427 regarding various standards for asbestos dust exposure and control. This included copies of the January 12 Federal Register announcement of proposed permanent OSHA standard for asbestos control in the work place.

February 18 - Issued Bulletin 426 reporting on February 10 demonstration by Mr. Reit of membrane filter monitoring method.

June 1 - Circulated announcement of Microscopy Seminar scheduled by McCrone Research Institute in Chicago week of June 26.

June 6 - Circulated supplementary informatinn received from Illinois Institute of Technology Research Institute regarding friction material emissions and issued tentati schedule for third Committee meeting to be held late July or August.

June 12 - Issued announcement of OSHA permanent standards on asbestos dust exposure as published in June 7 Federal Register.

The latter item has been rather intensively studied by your Chairman, by AIA/NA, and no doubt also by concerned individuals in practically all companies represented in ASSI. The consensus appears to be that the new regulation is stricter than need be in respect to the future TLV of 2 fibres per cc, but is more lenient than was expected in regard to many other important matters. Major changes between the new regulation and the earlier emergency standard and earlier proposed permanent regulations are as follows:

1. Automatic reduction of TLV to 2 fibres in four years.

2. Use of protective clothing required above 10 fpcc ceiling limit. Change rooms, dual locker facilities, and special laundering and clothing handling procedures required.

3. Monitoring required at least every six months at operations exceeding allowable TWA concentration.

4. Physical exam and doctor's approval required before assigning employees to jobs requiring use of respirators.

5. Elimination of references to "cancer" and "danger" on signs and labels. Labeling eliminated for products containing locked-in fibre.

6. Specific restrictions on "dry sweeping" and use of compressed air for cleaning eliminated.

7. Medical examinations, including pulmonary function tests, required annually for all employees exposed to dust.

8. Employee access to medical and monitoring records required. Employees exposed to levels above TLV must be notified in writing.

9. Waste containing only locked-in fibre need not be sealed nor labeled.

While many serious difficulties are expected in achieving compliance with the new regulation by miners, textile manufacturers, and insulation fabricators and installers, it appears to me that most friction material manufacturing operations not relying on textile technolog should have relatively little trouble, although some dry mold type friction operations may also pose problems.

Perhaps of a more serious nature is the potential threat of banning of asbestos in friction materials, particularly in automotive vehicles, to eliminate emissions from wear debris. It is doubtful that any further action in this direction will be taken until results of the comprehensive study by Bendix Corporation for EPA have been announced. I have been advised that this study, originally to have been completed this month, now is not expected to be finished until late this year.

Most of the difficulties that arose in this study to date have occurred in connection with the gas collection phase of the program. Since the study involves collection and analysis of g aseous emissions as well as particulates, precision rotary seals and gas collection systems had to be developed and evaluated, and this has necessitated extensive and time consuming engineering design efforts.

Another vital EPA program also is running behind schedule. That is promulgation of the permanent regulations and standards for asbestos emissions to the ambient atmosphere. I have been advised by the EPA Hazardous Pollutants Branch that the earliest date these standards are expected to be issued is the beginning of August, and they could be delayed until early September. However, no major changes are expected in the portions of the proposed regulation affecting manufacturing operations. Significant changes are expected in the sections applying to mining and spraying operations. Probably the only significant change between the proposed regulation and the expected final regulation as far as manufacturing operations are concerned is the broadening of specifications on fabric filters and wet dust collectors. This should be helpful to industry in permitting somewhat more flexibility in dust collector selection and application.

Before closing, I should like to recommend a few of my thoughts and suggestions that I have received from others concerning items that should be considered and reviewed by the Asbestos Study Committee during the following year.

1. Uniform interpretation of OSHA standards. Liaison with AIA/NA will be helpful in this.

2. Determination of technological feasibility of achieving both 2 and 5 fibres throughout the industry.

3. Determination of the overall effect on the friction material industry of the OSHA standards.

5. Development of guidelines, aids, and educational programs to help customers comply with the regulations.

6. Investigate a suitable standard method for analysis for asbestos in brake lining wear debris.

7. Develop methods and recommendations for safe disposal or recycling of friction material grinding waste.

8. Follow as closely as possible medical and occupational health research concerning asbestos and asbestos-related diseases and determine whether FMSI or its member companies should help sponsor or otherwise support work of this nature.

All of these subjects probably will be reviewed at the third Asbestos Study Committee meeting to be scheduled within the next month or so. Please advise us of any additional items you or others in your organization may wish to add to our agenda for this upcoming meeting.

Respectfully submitted,

I. H. Weaver, Chairman