

January 24, 1985

To: Health and Environmental Affairs Committee

Subject: Environmental Protection Agency (EPA) Response to Natural Resources Defense Council (NRDC) Petition to Prohibit the Use of Asbestos in Automotive Brake Linings

In late December we distributed copies of the EPA response to the NRDC petition. On December 20 we distributed copies of Mr. Ruckelshaus' response and on December 26 we sent copies of the response as it appeared in the Federal Register. I have now discussed the response with Mr. Riopelle, Chairman of the Health and Environmental Affairs Committee.

Your Chairman is asking if the Institute should take action on EPA's request for comments. As may be noted in the Federal Register notice, they are asking for written comments before March 18, 1985. The question is whether the Institute should comment further, and if so, to what areas should comments be directed?

1. Should the Institute comment on errors which are of a background nature? For example, it could be more clearly stated that disc brake linings are used on almost 100% of light to medium vehicles on an original equipment basis, and drum brake linings are only used on the fronts of older light to medium vehicles and on most rears.
2. Should we re-submit the comments made in the Institute letter of November 13, 1984 on the NRDC petition? Should these be re-submitted as written earlier?
3. In the earlier letter, we left openings for possible additional comments. Should the Institute present additional comments, and if so, what specific comments?
4. Should the Institute make essentially new or stronger comments on such subjects as the availability of substitutes and the need for such a prohibition. This would involve a new position paper.
5. Should the Institute address the subject of specifications on friction materials, covering certain performance criteria with which all manufacturers must comply. This question is posed because the search for replacement materials having the desirable characteristics of asbestos has, and will continue to be, a difficult task. Thus, would it be of value to relate this search to product specifications.

Please consider the EPA's response as it appeared in the Federal Register, and suggest what action, if any, the Institute should take.

E. W. Drislane  
Executive Director

Copy: Officers & Board of Directors

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