

Mr. Feltman

Research Center

TEL 201-529-3450

PLAINTIFF'S
EXHIBIT
FMST-102

Dear Mr. Lawcon:

The Abex Corporation, through its American Brakeblok Division is one of the major suppliers of friction material for brake and clutch use in the United States. During 1971, our sales of asbestos containing friction material for use in vehicles operating in the United States will be in excess of 20 million dollars.

Our interest is specific to Part VII, Section 702 of the proposed regulations which states "The use of asbestos in the brake lining of vehicles manufactured after January 1, 1975, and sold for use in Illinois is prohibited". Our comments are as follows:

1. Asbestos fiber is an important component of organic friction material used in brake and clutch facings for vehicles manufactured and used in the United States. Of known fibrous material, asbestos imparts unique strength and thermal properties to friction lining, in addition to providing unique performance characteristics essential to safe and reliable braking and clutching of vehicles.
2. We are aware of investigations conducted on the nature of wear products from linings in use, as well as the identification of airborne particles from operating brakes. Air sample analysis conducted by our Medical Department to collect wear product particles during brake operation on our laboratory dynamometers confirms the findings of J. R. Lynch as reported in his study "Brake Lining Decomposition Products" published in the Journal of the Air Pollution Control Association, Vol. 18, No. 12, December, 1968.
3. Axex Corporation, in conjunction with Arthur D. Little, Inc., submitted a technical proposal to the Environmental Protection Agency in response to that agency's request for proposal No. EHSD 71-NEG 102 "Characterization of Emission from Automobile Brake and Clutch Linings". In this way we are well aware of the investigation work now being carried out by the Bendix

ASBESTOS AND THE FRICTION MATERIAL INDUSTRY

Mr. I. H. Weaver of Raybestos-Manhattan, Inc., who serves as Chairman of the Friction Materials Standards Institute Asbestos Study Committee addressed the Annual Membership Meeting of the Institute. Mr. Weaver's address was delivered in Vail, Colorado on Wednesday morning, June 27, 1973.

Mr. Weaver's address follows:

When Ed (Drislane) asked me to attend your annual meeting last year, I had to decline, which may have been just as well in view of the confused status of both OSHA and EPA regulations at the time. This year things are only slightly less confused, but I am glad to be able to be here anyway to attempt to fulfill my responsibilities in reporting to you as your Asbestos Study Committee Chairman. Rather than present a detailed statement covering Committee activities for the year, I should like to use my time to review some of the more controversial and confused elements of the Federal Asbestos Regulations, and give recommendations as to what I think the stance of the Friction Materials Industry should be in regard to them.

In lieu of a detailed report covering the past year's activities, I have prepared a page and a half summary of the Committee's work from June '72 thru June 1, 1973. Mr. Drislane will circulate copies of this summary to anyone who may be interested in it, and if any of you have questions or recommendations concerning our past work or future intentions, please feel free to bring them up here, or if you prefer, transmit them to Ed for our review later.

Probably the single most significant event that occurred during the past year on the subject of asbestos hazards was the meeting of the International Agency for Research on Cancer that was held at Lyon, France last October. This meeting was attended by more than a hundred and thirty medical researchers and representatives of government, industry and labor from virtually every major asbestos consuming or producing country in the world. For four days intensive sessions on asbestos were held by three different panels, each made up of ten to twenty-five of the foremost medical and scientific experts operating in the various fields of asbestos-health research. Following the meetings the committees issued a combined report on asbestos cancers. I think the following five items summarize their most important conclusions:

- (1) All major commercial types of asbestos can cause cancer.
- (2) Evidence suggests that excess lung cancer is not detectable when occupational exposure has been low. (Just what is meant by "low" was not stated.)

D-4
(8)

October 22, 1976

TO: Asbestos Study Committee

SUBJECT: Recommended procedures for reducing asbestos dust during
brake servicing

On September 27, 1976 I forwarded a write-up to Asbestos Study Committee members relative to procedures that might be followed in brake service areas to minimize the problems with asbestos dust. This write-up was made about two years ago and had been reviewed by Mr. Weaver, of Raybestos Manhattan, Inc. and the writer in order to up-date it. However, in the last review Mr. Paul Lee of Raybestos suggested "Recommended Procedures for Reducing Asbestos Dust during Brake Servicing." A copy is enclosed.

Mr. Lee, and Mr. Weaver concurs, that this "Recommended Procedures for Reducing Asbestos Dust during Brake Servicing" is more concise and to the point as concerns procedures to be used in brake service areas. It is also more in harmony with the NIOSH recommendations. It is suggested that the Institute endorse such a write-up, or review the existing draft procedures that might be recommended to brake service-shops when working with asbestos containing brake linings.

I suggest that you review this one page write-up and compare it with the earlier write-up and perhaps review it along side of the NIOSH recommendations. The Institute would like to prepare a final write-up in this area that could be used for distribution when questions are received from the news media and others interested in the asbestos problem.

E. W. Drislane
Executive Director

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