

December 8, 1971

TO: MEMBERS OF ASBESTOS STUDY COMMITTEE

SUBJECT: RECENT ACTIONS BY FEDERAL AND STATE GOVERNMENTS CONCERNING ASBESTOS

There has been considerable output concerning asbestos in recent weeks. We are, therefore, sending to each member of the Asbestos Study Committee the following:

1. Illinois Pollution Control Board Regulations
 - 1.1 Memorandum of December 3, 1971 on "proposed final draft" of regulations on asbestos.
 - 1.1.1 Note that the section banning asbestos containing brake linings after 1975 has been eliminated.
 - 1.2 Chicago Tribune article of December 2, 1971 concerning asbestos.
 - 1.2.1 Nothing specific about brake lining.
2. Environmental Protection Agency Emission Standards
 - 2.1 Federal Register of December 7, 1971 spelled out the proposed standards for Asbestos, Mercury and Beryllium.
 - 2.1.1 The proposed standard for asbestos only is included in our excerpts.
 - 2.2 New York Times article of December 4, 1971 concerning the proposed emission standards.
 - 2.2.1 This can serve as a digest of the proposed standards in the Federal Register.
 - 2.2.2 Note that the asbestos standards were set with control practices (filters and traps) rather than by numerical emission values.
3. Department of Labor - Exposure to Asbestos Dust
 - 3.1 Federal Register of December 7, 1971 - Federal Supply Contracts.
 - 3.1.1 To apply the new Williams - Steiger Act standard on asbestos to Federal Supply Contracts.
 - 3.2 Federal Register of December 7, 1971 - Construction
 - 3.2.1 To apply Williams - Steiger Act standards to construction.

E. W. Drislane
Executive Secretary

Messrs: I. H. Weaver
J. C. Henning
Dr. W. Spurgeon
W. B. Reitze
J. B. Graham
E. H. Feierabend

Raybestos-Manhattan, Inc.
World Bestos Company
Bendix Corporation
Johns-Manville Corporation
Carlisle Corporation
Abex Corporation

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FMSI 06620

Friction Materials Standards Institute, Inc.

370 LEXINGTON AVENUE

NEW YORK 17, N. Y.

September 30, 1971

To: Members of Asbestos Study Committee

Subject: Proposed Emission Standard for Asbestos

Gentlemen:

In line with the discussions at the September 15, 1971 meeting of this Committee, Dr. Stefl, Chairman, is forwarding the below listed write-ups to the members of this Committee. We do not intend to distribute this data to the membership at large until the Committee has had the opportunity to review both the Federal Proposal and the draft of the AIA Comments and Suggestions.

(1) Proposed Environmental Protection Agency
Standards for Asbestos Emission.

Comment: Dr. Stefl felt it worthwhile that the Committee see this draft copy, but he is certain that the Federal Standards will be quite different.

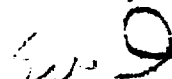
(2) Comments and Suggestions from Asbestos Information Association/North America.

Comment: These are the AIA Comments and Suggestions made regarding the initial draft of the proposed Federal Standards at a meeting held in Atlanta in mid-August.

Dr. Stefl further advised, and this is to be considered confidential, that he and others from the AIA met with members of the Illinois Pollution Control Board on September 17, 1971. At this meeting he was advised that hearings would be held at three locations on different dates in October, and that AIA/NA would give written comments at the October 15 meeting in Chicago. Personnel on the Control Board had received comments from the motor companies on the brake lining ban. They were not aware of the E.P.A. tests on asbestos emission from brake lining that are being run by Bendix Research Laboratories.

Copies of the minutes are enclosed.

Sincerely,



Executive Secretary

EWDrislane/icb

Messrs.: E. P. Stefl
J. C. Henning
E. H. Feierabend
W. B. Reitze
E. Spurgeon
J. B. Graham, Jr.
J. W. Greenen, ex-officio
L. D. Stickles, Counsel

Raybestos-Manhattan, Inc.
Firestone Tire & Rubber Company
Abex Corporation
Johns-Manville Corporation
The Bendix Corporation
Carlisle Corporation
Maremont Corporation
Stickles, Hayden, Kennedy,
Hort & Van Steenburgh

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FMSI 06621

November 29, 1971

Mr. Samuel T. Lawton
State of Illinois Pollution Control Board
189 West Madison Street
Suite 900
Chicago, Illinois 60602

Dear Mr. Lawton:

I realize that by this time the Illinois Pollution Control Board may have already acted on the proposed asbestos regulations. As most of the domestic brake lining and clutch facing manufacturers are members of this Institute, we are particularly concerned with Part VII, Paragraph 702, of your Proposed Regulations on Asbestos:

The use of asbestos in the brake lining of vehicles manufactured after January 1, 1975 and sold for use in Illinois is prohibited.

We were able to alert our domestic members as to the seriousness of these proposed regulations. We are aware that some of them expressed their views directly to you.

In today's mail I received the attached from the British Friction Materials Council, an organization similar to ours in Britain. I think it is a well written, carefully worded and, I believe, well documented presentation.

Having worked in the brake lining industry for over seventeen years with asbestos linings and metallics, I believe their Item #2 is most pertinent. If one measures the amount of free asbestos fiber in brake lining dust, they say it is about 1% of the total products of wear. Were you to go to a brake relining shop and collect the wear remnants, you would not detect fibrous material in the wear products. The dust appears more to be like a talcum powder or flour with no fibrous structure evident.

We trust that this work by the British Council be considered when you are drafting your final regulations.

Sincerely,

EWD/icb
Enc:

E. W. Drislane
Executive Secretary

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FMSI 06622

November 10, 1971

MEASUREMENT OF ASBESTOS FIBERS IN THE AIR

Since the organization of the Asbestos Study Committee it has been suggested that all members be advised on monitoring asbestos fiber concentrations in the work place. This should be of interest since the Occupational Safety and Health Act of 1970 was effective on April 28, 1971. Mr. William Reitze of Johns-Manville addressed the June meeting on this Act and subsequently we distributed literature concerning the Act and Threshold Limit Values.

Mr. Reitze advised that there was a guide published by the Asbestos Textile Institute:

"Measurement of Airborne Asbestos Fiber by the Membrane Filter Method."

Source: Asbestos Textile Institute
P.O. Box 239
Pompton Lakes, N. J. 07442
Price: \$1.00

Mr. Reitze cautioned, however, that this document might be misleading if personnel doing the work do not have the proper background or training.

For this reason, Mr. Reitze would be willing to give a talk and demonstration, including a discussion of materials, methods, costs, personnel requirements, and legal aspects. This would not be a training course but would be an information session where those responsible for making decisions could be given enough information to decide which course their firm should follow. There would, of course, be no charge for this presentation.

If there are members of your firm who would be interested in such a session please advise. It generally would be planned to have the session, if interest is sufficient, sometime after mid-January in the New York metropolitan area. As Mr. Reitze now must travel in from Denver, it would be important for those interested to indicate rather positively their intentions as regards attending such a session.

E. W. Drislane
Executive Secretary

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Distribution: Active Members
Asbestos Study Committee

FMSI 06623