



Intra Company

ENGINEERING AND
MANUFACTURING STAFF
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Subject: Control of Asbestos Emissions -- Progress Report.

The proposed standards for asbestos, beryllium, and mercury appeared on a Federal Register (December 7, 1971, volume 36, No. 234). In December, 1971, the EPA also published "Background Information -- Proposed National Emission Standards for Hazardous Air Pollutants: Asbestos, Beryllium, Mercury", to supplement the Federal Register. This letter is intended to bring you up to date on the subject of asbestos control and the possible effects that such a standard may have on the automotive industry. A discussion dealing with the sources of asbestos, effects on health, alternates to asbestos brake-lining, etc. were discussed in an earlier letter (copy attached).

Although the proposed asbestos standard is not defined in terms of numerical values, it does require that all asbestos emission sources provide adequate asbestos emission controls. A numerical standard may be adopted in future when:

1. A dose-response relationship between levels of airborne asbestos and resulting human diseases is established.
2. Reliable and rapid analytical technique are available to determine the level of asbestos emissions from different sources.

In reviewing the EPA publication, it is apparent that the control of asbestos emissions from brake-lining is not a "dead-issue" as many would like to believe. The report states that "The asbestos emissions from use of these materials (brake-lining is one of them)