

Davis, Suzanne@DTSC

From: SSevernak@akebono-usa.com
Sent: Tuesday, July 15, 2014 5:17 AM
To: brakepad@DTSC
Cc: BPeters@akebono-usa.com; Rodriguez, Evelia@DTSC; iwes461@ECY.WA.GOV; Davis, Suzanne@DTSC; Yoichi.Kawashima@akebono-usa.com
Subject: Re: Comments for California Brake Pad Law
Attachments: 9-2013 email chain regarding marking of brake pads for OES between Washington and California.pdf; Typo California Strawman reg language.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Comments for the "Strawman reg language 6-16-14.pdf" draft regulation.

1) How are pads to be marked for OESC (Original Equipment Sales Contract) once the 2021 & 2025 deadline occurs. Akebono's input would be the same as Washington's existing laws or another alternative method that aligns marking requirements for OESC between Washington & California. See attached previous e-mail chain regarding the subject. Akebono could be more than willing to participate in brainstorming sessions or other methods to help devise a scheme that works for all.

2) How to implement "Alternatives Assessment"?

3) Looks like there is a typo on page 9.

Regards,

**Scott Severnak | Director, Friction Material Design
Akebono Brake Corporation**

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34385 West 12 Mile Road, Farmington Hills, MI 48331 | www.akebonobrakes.com

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From: "Davis, Suzanne@DTSC" <Suzanne.Davis@dtsc.ca.gov>
To: "Davis, Suzanne@DTSC" <Suzanne.Davis@dtsc.ca.gov>
Cc: "Rodriguez, Evelia@DTSC" <Evelia.Rodriguez@dtsc.ca.gov>

Hello,

You are receiving this announcement because you have contacted the Department of Toxic Substances Control in the past with questions regarding the Brake Friction Material Law also referred to as the California Brake Pad Law.

The Department of Toxic Substances Control (DTSC) has prepared informal draft regulations to help implement the Brake Friction Material Law (Health and Safety Code sections 25250.50 et seq.) that became effective on January 1, 2014. The law restricts the content of brake friction material and requires that this material is tested and marked with an environmental code that indicates proof of certification. This informal regulation proposes the standards for implementing the law, including the marking of the brake pads, the analytical testing methodology, and the analytical laboratories qualifications. The regulation is also intended to provide details on the processes that will be used by DTSC for providing extensions to the January 1, 2025 restrictions and approving certification requirements used by the testing certification agencies.

DTSC is requesting comments on proposed informal regulation which is available on the DTSC Website at: http://www.dtsc.ca.gov/PollutionPrevention/upload/Strawman_reg_language_6-16-14.pdf. **Comments are due on the close of business on August 22, 2014** and may be submitted via e-mail to: brakepad@dtsc.ca.gov or via mail to:

Department of Toxic Substances Control

Attn: Comments on Draft Informal Regulations for Brake Friction Material Law

P.O. Box 806, Mail Station/Code: SPWP/MS 12A

Sacramento, California 95812-0806

DTSC will be holding a series of workshops within the next few months designed to receive comments from stakeholders on the proposed informal regulation and address potential issues before initiating the formal rulemaking process later this year. The dates for the workshops will be announced via the Brake Pad eList and on the DTSC Brake Pad Web page and are tentatively scheduled in July/August 2014. If you are interested in receiving updates regarding this law or the workshops, please subscribe to the California Brake Pad electronic mailing list at <http://www.dtsc.ca.gov/ContactDTSC/ELists.cfm>.

These workshops are an opportunity for members of the public to discuss the scope and content of the informal draft regulations. There will be additional opportunity for public comment when the formal rulemaking in accordance with the Administrative Procedure Act begins.

Thank you for your time.

Sincerely,

Suzanne Davis

Hazardous Substances Engineer

Cal/EPA

Department of Toxic Substances Control

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Regards,

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