

Department of Toxic Substances Control
Comments Received on the Informal Draft Regulations dated June 16, 2014

Division 4.5, California Code of Regulations, Title 22
Chapter 25. Hazardous Materials: Motor Vehicle Brake Friction Materials

Commenter Name/Affiliation	Comments/Questions
<p>Scott Severnak Director, Friction Material Design Akebono Brake Corporation 34385 West 12 Mile Road, Farmington Hills, MI 48331 Email: scott.severnak@akebono-usa.com</p>	<p>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. (Refer to document "Akebono 9-2013_email_chain_re_brake_pad_marking_for_OES_between_WA_and_CA.pdf" and "Akebono_comments_on_informal_draft_regulations.pdf")</p> <p>2) How to implement "Alternatives Assessment"?</p> <p>3) Looks like there is a typo on page 9. (Refer to document "Akebono Typo California Strawman reg language.pdf")</p> <p>4) Will there be additional regulations in the future that will define the alternative screening process?</p>
<p>Jack Molodanof Representing the Automotive Service Councils of California and the California Autobody Association Molodanof Government Relations 2200 L Street Sacramento, CA 95816 jack@mgrco.org</p>	<p>The (Marked proof of Certification) section 66275.7 needs to be strengthened, to clarify that: 1) the marking must be on the brake friction material and on the packaging and 2) the marking must be legible and "clearly visible" to the end user in order to be able to easily ascertain and verify that product is complaint. Also refer to the document "ASCCA CAA Comments on Informal Draft Regulations.pdf".</p>
<p>Lawrence "David" Schenk NSF International 789 N. Dixboro Road, Ann Arbor, MI 48105 LSchenk@nsf.org</p>	<p>Refer to the document "California regulations-NSF notes 2014-08-01.pdf" for copy of the original comments.</p>
<p>Dawn Petschauer Water Biologist III City of Los Angeles Watershed Protection Division Pollution Assessment Section 2714 Media Center Drive Los Angeles, CA 90065 Email: dawn.petschauer@lacity.org</p>	<p>Refer to the document "Comments on Draft Informal Regulations for Brake Friction Material Law 08-21-2014.pdf".</p>
<p>Terry Heffelfinger Vice President, Product Development, R & D, & Quality Brake Parts Inc LLC Global Brake 4400 Prime Parkway McHenry, Illinois 60050 terry.heffelfinger@BrakePartsInc.com</p>	<p>Refer to the document "Brake Parts Inc Comments on Informal Draft Regulations.pdf".</p>
<p>Geoff Brosseau Executive Director California Stormwater Quality Association (CASQA) P.O. Box 2105 Menlo Park, CA 94026-2105 Email: info@casqa.org</p>	<p>Refer to the document "CASQA Comments on Draft Informal Brake Friction Material Regulations.pdf".</p>
<p>Julia Rege Director, Environment & Energy Association of Global Automakers, Inc. (Global Automakers) 1050 K Street, NW, Suite 650 Washington, DC 20001 Email: jrege@globalautomakers.org</p>	<p>Refer to the document "Alliance-Global CA Brake Friction Material Comments FINAL ID7934.pdf".</p>
<p>Leigh S. Merino Senior Director, Regulatory Affairs Motor & Equipment Manufacturers Association 1030 15th Street, NW, Suite 500 East Washington, DC 20005 Email: lmerino@mema.org</p>	<p>Refer to the document "MEMA Comments-to-DTSC-Informal-Draft-CopperRule FINAL Sept-5-2014.pdf".</p>
<p>Andria Ventura Program Manager Clean Water Action/Clean Water Fund 350 Frank H. Ogawa Plaza, Suite 200 Oakland, CA 94612 Email: aventura@cleanwater.org</p>	<p>Refer to document "Clean Water Action brake pads-comments on informal draft.pdf".</p>
<p>David Pinkham Government Affairs Auto Care Association (formerly the Automotive Aftermarket Industry Association) 7101 Wisconsin Ave., Suite 1300 Bethesda, MD 20814 Email: David.Pinkham@autocare.org</p>	<p>Refer to document "CA Brake Pad Comments Sept 2014.pdf".</p>