

BACKGROUND

Scientific investigations into the occupational factors involved in the development of cancer, conducted in recent years, have provided evidence that occupational related cancer is a serious concern. It has been estimated by the U.S. Department of Health, Education and Welfare that in coming decades up to 20% and perhaps as much as 40% of cancer in the U.S. might be associated with occupational factors.^{1/} Accordingly, Personnel and Organization Staff, Employee Health Services, has been involved in a continuing effort to provide employee protection, as knowledge of toxic/hazardous materials has been introduced.

Public concerns relating to the control of toxic/hazardous materials, are shared by the Company and the UAW. The right to examine the Hazardous Materials Catalog from the Company's computer file of hazardous materials, and on-line access to the Materials and Toxicology System (MATS) has been extended to the UAW by contract.

Emphasis on wastewater pretreatment standards, toxic pollutant effluent standards, nonregulated/hazardous air pollutant emissions control and solid/hazardous waste management has been increased by governmental authority. These factors reinforce the desirability of reducing the amount of residuals generated by Company manufacturing processes and operations, through more efficient manufacturing techniques and by materials substitution.

During the past decade, the Company was subjected to a growing number of laws which regulate material use, transport, handling, and disposal (Fig. 1). Under certain of these Acts, a "knowing/willful" criminal violation can expose individuals, including officers of the Company, to five years imprisonment. Civil and criminal penalties include maximum fines of \$25,000 per day; a citation normally consists of multiple related violations.

Litigation is also a growing concern. For example at present the Office of the General Counsel has three suits pending, involving deaths allegedly due to the inhalation of asbestos.

Internal and external pressures regarding hazardous substance control and compliance have increased substantially since March, 1977, when Directive B-101 was issued to assign responsibilities within the Company (Fig. 2). Since that time new standards have been issued, additional standards are anticipated, and the level of economic risk has increased.

^{1/} Federal Register 45(15): 5031, January 22, 1980.

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