

FILE NAME: Ford (FD)

DATE: 1979 Nov 8

DOC#: FD078

DOCUMENT DESCRIPTION: Memo

His Office

Car Engineering Group

November 6, 1979

Mr. J. W. Durstine

cc W. H. Anderson
G. L. Bolling
T. J. Peckham

H. G. MacDonald
H. A. Mickol
W. C. Hickey

Subject: Car Engineering Practice Letter Concerning Asbestos

Re: Your letter, same subject, dated October 31, 1979

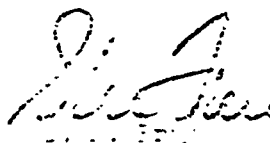
Several problems exist with your assessment and subsequent recommendation against adoption of a CRP for Company usage of asbestos.

The current regulatory scenario is more complex than stated in your letter. Four major cancer policies will be adopted by the Federal Government before the end of 1979. The first (issued September 25, 1979) is a general government-wide policy crafted by the Interagency Regulatory Liaison Group (IRLG), and is intended to be a "framework" for carcinogen regulation. The EPA cancer policy was issued October 10, 1979 and contains proposed rules for regulation of airborne carcinogens. OSHA and DHEW cancer policies will be issued before the end of the year.

It is readily apparent that there will be a drive to reduce asbestos consumption in the United States, and that the four "cancer policies" will ultimately accomplish this task by pressing to eliminate non-essential uses (regardless of legal challenges and other delays). The EPA has already stated their first order for regulation as brake wear emissions, asbestos cement water pipes, and paper products (gaskets).

When we focus on brake materials, it is reasonably certain that GM will use only asbestos-free brakes by 1985. Competitive pressures are therefore an additional reason for "getting our house in order". As stated in the first paragraph of the CRP, our intent is to develop alternate materials to facilitate an orderly transition to non-asbestos substitutes as the need arises. Continued proliferation of asbestos usage is not in the best interests of the Company.

Our Engineering is responsible for proper anticipation of, as well as reaction to, conditions which will affect product design. It is necessary, therefore, that we develop proven substitutes for asbestos; the proposed CRP will accomplish this. It is our belief that any other current recommendation is not in the best interest of the Company. If you have the need for further information, please contact me.



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