



5/13/80. Copy to Guy. ✓ 2 Dicks

GOK/lp

5/13/80 Copy: W. N. Moore
J. Shaw 5/13

G. O. KEUTGEN

Inter Office ✓

Metal Stamping Division

May 9, 1980

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P.F. GUY

PLAINTIFF'S EXHIBIT

FD-942

To: Mr. G. O. Keutgen

From: H. A. Nida

Subject: Carcinogens Task Force Report to E & R and M & S Subcommittees

Our review and analyses of the proposed report indicates that Metal Stamping Division can agree in general with the proposed strategy and work plan and the recommendations.

- 0 With regard to the proposed elimination of three specific carcinogens by Job #1, 1985, we do not believe that it is physically or economically possible to completely eliminate the use of asbestos material in the non-production category within that time span. For example, most of our approximate 2700 presses are equipped with a clutch-brake system utilizing, to some degree, asbestos impregnated material as a friction contact surface. Even if a substitute material is available or is developed with similar wearability and heat dissipation characteristics, it is highly unlikely that all of the existing material could or would be replaced in that relatively short time span. Many of these systems last for years of use with minimal maintenance and would only be changed by instituting a directed program involving excessive manpower and an inordinate amount of equipment downtime.
- 0 Similarly, elimination of chromium compounds as well as all derivatives and input materials at our Monroe plating operations is not likely to occur without the development of alternative processes or product revisions to other materials.

The institution of controls related to employee exposure and handling will be the only feasible approach with some of these substances in the near future.

A. Q. N.

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