

FILE NAME: Caterpillar (CAT)

DATE: 1990 Sept 13

DOC#: CAT044

DOCUMENT DESCRIPTION: Unpublished Internal Report - Asbestos
Elimination

September 13, 1990

ASBESTOS ELIMINATION

SCOPE

Eliminate asbestos-containing items from the worldwide Parts Distribution network no later than August 25, 1994, and prevent a backflow of asbestos-containing items into the network. Asbestos-containing items shall be targeted for elimination in two phases:

1. On-hand part numbers with less than a two (2) year time supply shall be targeted for elimination by August 25, 1992, to avoid relabeling, except where EPA relief may be granted.
2. All other material shall be eliminated by the 1st Quarter of 1994, except where EPA relief may be granted.

OBJECTIVES

The following objectives will be used to develop PDIS System specifications for the elimination of asbestos parts from the Parts Distribution network. The following abbreviations are used in the list of objectives:

A/C	-	Asbestos-containing
A/F	-	Asbestos-free

- o Receive A/F material only from all sources.
- o All U.S. facilities shall have the capability or resources to inspect receipts for asbestos and identify the material as A/C or A/F.
- o All facilities shall store A/C and A/F items in separate locations.
- o As much as possible, all A/C material shall be exhausted from inventory rather than scrapped.
- o All production withdrawals from Parts Distribution facilities shall be A/F material only. (As of April 1, 1990, this objective went into effect under manual controls).

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- o The flow of A/C material through the Parts Distribution network shall be in one direction only: (Effective date December 1, 1990).
 - A. No allocation, reallocation, or returns of A/C material to Morton from other Parts Distribution facilities shall be permitted.
 - B. No returns by Depots back to U.S. Departments shall be permitted.
- o All Dealer returns shall be inspected and properly identified as A/C or A/F. Disposition of the material shall be made, based on cost of the material and the facility's inventory status.
- o All material shall be identified as part number by facility as to asbestos status.
- o Appropriate status reports shall be provided to the U. S. Government, as required by law.

GENERAL DESCRIPTION

The following narrative attempts to describe the functional components of the asbestos elimination project. The necessity and urgency of this project are the result of Governmental Regulations requiring the elimination of asbestos-containing material from products in the U.S. by August 25, 1994. These requirements impact the worldwide Parts Distribution network, in that the one key aspect of the elimination project will be to prevent the backflow of asbestos-containing items into any facility which has previously exhausted asbestos-containing material from its inventory.

The elimination process will be controlled by part, by facility. The underlying principle to eliminating asbestos-containing (A/C) items from the Parts Distribution network is to become asbestos-free (A/F) at MPDC and push the A/C material downward in the P.D. network. After Morton is A/F on a given part number, Parts Departments, then Depots in turn will eliminate their A/C inventory. An asbestos EPA indicator will be established on the P.D. Master file for each facility. This indicator will indicate the current inventory status of a part number as being A/F, not A/F, or not an asbestos candidate. A/C inventory will attempt to be eliminated by exhausting stock; scrapping of inventory will be done only as a measure of last resort. The succeeding topics will describe asbestos elimination efforts by major functional groups.

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RECEIVING/INSPECTION

The P.D. Master planning indicator 2 field is presently being used to indicate the receiving status of an asbestos part from source of supply. An immediate objective of the project is to receive only A/F material at Morton from all sources as soon as possible. All U.S. facilities must develop adequate inspection procedures for inspecting receipts to identify material as A/F or A/C. Alternate sources of supply will need to be developed for any suppliers who are unable or unwilling to provide A/F material.

STORING/LOCATING

Another critical component of this project is the ability to maintain separate locations, by part number, for material known to be A/F and material which is known to be A/C or has the potential of containing mixed stock. Receiving systems will need to have the ability to route A/C receipts to a known A/C location until an A/F receipt generates a new A/F location, at which time all subsequent receipts will be rerouted to the A/F location or set up additional (multiple) A/F locations. Locations must be properly identified with A/C or A/F labels accordingly.

ORDERFILLING

As long as the facility asbestos status indicator reflects the presence of A/C material at the facility, all orderfilling will be done out of identified A/C locations. Once an A/C location becomes empty, a kill transaction should be generated to remove that location from the location file(s). If all A/C locations have been eliminated, the facility EPA indicator must be reset to reflect an A/F status for the part number. All outbound material must also be properly identified with A/C or A/F stickers. Also, requirements have been defined for the project which prohibit A/C material from being used to fill production withdrawal orders.

RETURNS/ALLOCATIONS/REALLOCATIONS

As mentioned previously, one of the most critical requirements of the elimination project will be to prevent the backflow of A/C items in the P.D. network. At Morton, all Dealer returns of asbestos part numbers will be inspected for the presence of asbestos, identified, and dispositioned accordingly. No Department or Depot returns will be accepted. Likewise, P.D. Departments will accept A/C material from Morton only. No Depot returns of asbestos parts will be permitted to the U.S. Departments. Once the U.S. Department facilities have exhausted A/C stock, their appropriate inventory status indicators will be reset accordingly. P.D. Depots will be the last link in the chain, prior to Dealers, for exhausting A/C material. Throughout the network, no allocation or reallocation of A/C parts will be allowed which violates the backflow restriction.

TARGET DATES/GOVERNMENT REPORTING

Two significant target dates have been identified as an integral part of the elimination project. They are:

1. 1st Quarter, 1994 - All other A/C items shall be eliminated; this is a cushion to assure compliance with Federal Regulations requiring all A/C inventories be scrapped no later than February 25, 1995, except where EPA relief may be granted.

Finally, certain reports will be required to be provided to the Federal Government. The responsibility for generating the necessary reports will be determined during system requirements planning.

PDIS ESTIMATES

Information Services has addressed the elimination of asbestos and is providing the following estimates for the work involved, based on the project scope and objectives.

SYSTEM CHANGE ESTIMATESPDLMS

- o Add the asbestos (EPA) indicator to the DB2 database.
- o Establish separate locations for A/F material at Morton, York, and Denver.
- o Pass transaction to update PDD master EPA indicator to A/F when applicable.
- o Add EPA indicator to Morton Multiloc file for TICS tag processing.

ESTIMATED EFFORT - - - 170 Staff Days

Receiving System (Morton)

- o Identify asbestos type parts at receiving time.
- o RTS will pass information to PDLMS, which will determine the location.
- o Pass EPA indicator to TCAM Tag Print

ESTIMATED EFFORT - - - 7 Staff Days

SYSTEM CHANGE ESTIMATES (CONT'D)

Receiving System (York & Denver)

- o Identify asbestos type parts at receiving time.
- o Use prelocation subroutine to determine A/F location.
- o York and Denver in-transit tags need A/F identification.
- o A/F secondary receipts must be identified via the Summary Run through SOP and Invoicing to prevent A/F material from being mixed at York and Denver.
- o A/F production receipts must be identified via the Summary Run to prevent A/F material from being mixed at York and Denver.

ESTIMATED EFFORT - - - - 36 Staff Days

Locating System (York & Denver)

- o Identify A/F locations on York and Denver SAS Overflow file.
- o Populate Overflow file with locations containing asbestos.
- o Modify relocations subroutine to determine asbestos disposition, based on information passed from calling program.
- o Produce Summary Run transaction to set asbestos indicator to A/F.

ESTIMATED EFFORT - - - - 100 Staff Days

Retrieval System

- o Identify and employ FIFO logic for all asbestos parts.
- o Pass transactions to update PDD Master when A/C material is depleted to indicate A/F.

ESTIMATED EFFORT - - - - 50 Staff Days

SYSTEM CHANGE ESTIMATES (CONT'D)

Summary Run

- o Add an EPA indicator to the PDD Master for each parts facility to track the status of each asbestos part which is stocked:
 - '0' Not an asbestos candidate
 - '1' A/F Only
 - '2' Both A/C & A/F Parts
 - '3' A/C, No Receipt on A/F
- o Pass EPA indicator along with each York/Denver Department tag as a result of a receipt for processing in the SOP System and York/Denver Receiving System.

ESTIMATED EFFORT - - - 25 Staff Days

TICS

- o Print A/C or A/F on all asbestos parts for nonrevenue facilities. The EPA indicator would be used in conjunction with the location to identify when the part is going from containing to free. (EPA indicator would have to be added to TICS TLOCFILE).
- o Pass EPA indicator from Multiloc and Overflow files to TICS TLOCFILE. TLOCFILE must be expanded to accommodate the indicator.

ESTIMATED EFFORT - - - 25 Staff Days

Quality Control

- o Add asbestos sampling routines to existing QC and Met Lab sampling program.

ESTIMATED EFFORT - - - 25 Staff Days

Order Entry

- o Use the PDD Master planning indicator 2 (EPA indicator once it is established) to prevent production facilities from ordering asbestos parts.

ESTIMATED EFFORT - - - 7 Staff Days

SYSTEM CHANGE ESTIMATES (CONT'D)

TCAM Tag Print

- o Print A/F on nonrevenue type 1 allocations when applicable. Will require some reformatting of the tag to accommodate the size of the message.

ESTIMATED EFFORT - - - - 20 Staff Days

New CIGS Application

- o Develop a screen to allow Departments and Depots to easily update the PDD Master EPA indicator when a part becomes asbestos-free (tape and disk master files).

ESTIMATED EFFORT - - - - 5 Staff Days

New Reporting System

- o Develop a reporting system, utilizing user programming (SAS, to provide a status update on a periodic basis for the U.S. Government.

ESTIMATED EFFORT - - - - 10 Staff Days

Project Administration

- o Administrative effort to manage the overall project.

ESTIMATED EFFORT - - - - 30 Staff Days

Unknowns

- o A 20% factor was added to cover unknown changes.

ESTIMATED EFFORT - - - - 95 Staff Days

TOTAL ESTIMATED EFFORT - - - - 70 ^{30/ Months} 605 STAFF DAYS

PROJECTED TARGET DATE - - - - FEBRUARY 1, 1991

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*check against IS
work plan*
*30 Staff Months in 3 mos = 10 people
Nov-Dec 90, Jan 91*

ISSUES

ASBESTOS-CONTAINING PRODUCTION WITHDRAWALS

All asbestos-containing part numbers blocked effective (September 1, 1990), per administrative agreement.

DEALER RETURNS

Inventory Control (Willard Jackson) is currently reviewing all returns on asbestos-containing parts and is determining their disposition at our returns facility. this action approves a degree of scrap.

This policy allows some asbestos parts to be received at Morton where our on-hand is deemed low and we expect to exhaust within the EPA requirements.

All asbestos Dealer returns should be blocked (December 1, 1991). This date is in union with program changes to store asbestos-free receipts separate from asbestos-containing.

SECONDARY RECEIPTS

When do we block the backflow of asbestos parts?
(December 1, 1991).

SURPLUS RETURNS (CIC FACILITY)

Surplus asbestos part numbers should be left at their respective facilities to be exhausted; thus, preventing backflow. Effective date (December 1, 1991).

SUBSIDIARIES RETURNS (NON-CIC FACILITY)

When do we block the backflow of asbestos parts?
(December 1, 1991).

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