PLAINTIFF'S EXHIBIT

FD-1209a

Inter Office

Transmission and Chassis Division
General Office
July 20, 1983

To: Engineering Managers
Industrial Relations Managers
Safety Engineers
Plant Physicians

cc: Plant Managers
Mr. P. G. Gross
Mr. M. B. Leyda
Mr. E. M. Nelson
Mr. J. M. Poe
Mr. R. S. Pomarolli
Mr. R. L. Smith

Subject: Utilization of Contractors to Effect the Removal of Asbestos Associated with Renovation or Demolition

In recognition of the potential health risks of friable asbestos and in response to public concern, various regulatory agencies, i.e., OSHA, have placed very severe restrictions on work practices associated with intrusion into asbestos bearing materials. We know that the health community unquestionably accepts linkage between the inhalation of asbestos fibers and such lung disorders as asbestosis (pneumoconiosis) and mesothelioma (tumor).

Two recent T&C asbestos work situations demonstrated to our satisfaction that we are not equipped to perform significant asbestos intrusion on an occasional basis. The cost and/or inconvenience associated with the utilization of a specialized contractor is more than justified by the elimination of potential employe health risks. Accordingly, it shall be T&C Division's safety policy to utilize a contractor to effect the removal of asbestos associatd with renovation or demolition. Any outside contracting should be consistent with the outside contracting clearance procedure provided for in the current Ford-UAW agreement.

The policy envisions the exercise of local judgment on a task to task basis. For example:

It would not be practical to assume a contractor will be utilized to perform such tasks as removing the asbestos from a valve bonnet to effect a gasket repair. All such decisions should be based upon the understanding that all material suspected as containing asbestos shall be treated as it if were asbestos until proven otherwise. All asbestos removal shall be performed in accordance with the attached industrial hygiene instructions. Medical surveillance and record keeping on an employe work life basis is required, and we should continue to search for and discontinue the use of any maintenance or construction materials containing friable asbestos.

PRODUCED BY FORD

Included with this communication is a copy of a seminar hand-out entitled "Asbestos Removal", prepared by the American Association of General Contractors in conjunction with the Michigan Department of Health. Although it is slanted towards the utilization of contractors, even a casual review provides a good understanding of the scope of the problem, the health risks and the detail of the control required in the planning and conduct of asbestos removal.

Any questions or comments regarding this communication should be directed to the undersigned on 523-4720.

R. D. Byrom

Attachments
E147-99-1

8006 0112

PRODUCED BY FORD

USTRIAL RELATIONS BULLETIN

7/ 75	BULLETIN TITLE: Industrial Hygiene	RESPONSIBLE DEPT.: Employe Health Services	BULLETIN NO.: 4
( )	Asbestos - OSHA 1910.93(a)	SUPERSEDES: New	DATED:

Effective July 7, 1972, the Occupational Safety and Health Administration of the Department of Labor promulgated regulations addressing employe exposure to asbestos. "Asbestos" as defined in the standard includes chrysotile, umosite, crocidolite, tremolite, anthophyllite, and actinolite. The standard applies to operations where asbestos or asbestos-containing materials such as but not necessarily limited to asbestos cement, mortar, coating, grout, plaster or similar materials are handled, mixed, applied, removed, cut, scored or otherwise worked.

Exposure limits applying to asbestos fibers longer than 5 microns are as follows:

a. Effective 7/7/72 - An 8-hour time-weighted average (TWA) not to exceed 5 fibers per cubic centimeter of air.

b. Effective 7/1/76 - An 8-hour TWA not to exceed 2 fibers per cubic centimeter of air.

c. A "Ceiling Concentration" of 10 fibers, above which no employe shall be exposed at any time.

nitoring requirements are such that in areas where asbestos fibers are released a determination shall be made as to whether every employe's exposure to asbestos fibers is below the limits addressed above. Such sampling shall be done at intervals of no greater than 6 months in cases where employe exposure to asbestos "may reasonably be foreseen to exceed the limits prescribed..."

Controls and requirements for those operations in which employes are exposed to concentrations in excess of the exposure limits include:

a. personal protective equipment
b. local exhaust ventilation
c. specific work practices
d. change rooms
e. labels and placards
f. specific cleaning and waste disposal techniques
g. employe notification
h. medical examinations
i. recordkeeping

Copies of complete standard are available from:

Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

rther information regarding this standard may be obtained from Industrial Hygiene, -0210.

8006 0113

PRODUCED BY FORD