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(12)

Inter Office

Environmental and
Safety Engineering

To: Mr. G. F. Bolling

April 28, 1980

From: V. H. Sussman *VH*

Subject: Asbestos Regulations

You asked me to comment on the recent statement by Eula Bingham (Wall Street Journal, April 18, 1980) concerning a study group (OSHA/NIOSH) proposal for a maximum workplace exposure limit of 100,000 asbestos fibers per cubic meter (0.1 fiber per cc).

This value of 0.1 fibers/cc and also 0.5 fibers/cc have been under consideration for some time. Adoption by OSHA of the lower value would make workplace control more difficult, but would still allow asbestos usage. This recent statement does not change our forecast that the probable goal of governmental agencies is to limit the annual amount of asbestos produced and processed in the country—and in addition, certain product categories will almost certainly be regulated as to asbestos content. Current material in the draft Carcinogen Task Force report of April 24, 1980 and the attached memorandum to Dick Lamb (E&RS) address the asbestos situation.

Whether or not OSHA comes out later this year with new standards on asbestos exposure, we believe the Company should search hard for substitute materials such as those listed in the draft report (clutch plates, brakes, etc., on page 4f). The fact that GM may be ahead of us in this regard will certainly encourage governmental agencies to be very active in considering appropriate regulations affecting automotive products. As you know, the banning of non-essential uses of asbestos is also a recommendation under consideration and may be proposed for 1985 or so.

Therefore, this statement by Ms. Bingham should not change our present course of actions based upon expected governmental efforts to control asbestos usage.

Enclosure

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