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Office of the General Counsel

September 1, 1983

H. R. Nolte, Jr., Esq.
Vice President and General Counsel

cc: J. W. Martin, Jr., Esq.
P. B. Coffey, Esq.

Re: Emergency Rule on Exposure to Asbestos

The Company's use of asbestos in its operations and products has been under review by a Task Force on carcinogens formed by the Hazardous Substance Control Committee in 1979. Efforts are under way to eliminate non-essential uses of asbestos. Steps such as clearer warnings in shop manuals are being taken to alert dealership mechanics and others who come in contact with asbestos components to the potential health hazards.

Mr. Roger Wabeke, a Supervisor, in the Industrial Hygiene activity, believes that with proper work practices, the Company's operations already meet the lower level that is proposed in the emergency rule. Mr. Wabeke notes that this lower level is almost at the limit of the detection capability.

It has long been thought that there is some "safe" level of exposure to asbestos. However, the maximum workplace exposure limit for asbestos has been changed intermittently, and consistently downward, since the 1930's. Now, there is controversy as to whether or not there is any safe level of asbestos in the workplace.

Richard J. Molloy
Richard J. Molloy
Assistant General Counsel

RJM/npc

Attn:

bcc: Roger Wabeke

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