



PLAINTIFF'S EXHIBIT

FD-1561 ac

Inler Office

Transmission and Chassis Division
General Office

September 2, 1982

To: Mr. D. R. Choquette

cc: Mr. S. J. Antanaitis
Mr. R. D. Byrom ✓
Mr. W. J. Digneit
Mr. A. A. Puchala

From: J. M. Poe

Subject: Remove, Repair and Replace Asbestos Insulation on Overhead
Utility Pipes - Canton Plant

The Canton Plant has requested funds of \$155,500. to repair deteriorated asbestos pipe insulation which is presently falling into the production areas. Building vibration induced by overhead cranes, presses, etc., causes the deteriorated asbestos to fall from overhead utility pipes.

In 1980, Ford Motor Company's task force for Carcinogens in the Work Place selected "asbestos" for priority attention and conducted Company-wide audits. The Industrial Hygiene and Toxicology Department (IH&TD) then conducted an on-site inspection and evaluation of test samples. Of the 64 samples analyzed at Canton, 35 were confirmed as asbestos. Given the distribution of sample results and the age of the pipe covering, the IH&TD recommended that all of the pipe covering be treated as asbestos. Additionally IH&TD recommended that all asbestos handling requirements specified by OSHA and Company policy should be followed in any removal project.

In February 1982, Canton Plant and Division engineers conducted an inspection of the areas identified by IH&TD and prepared a detailed report of the 1,940 ft. pipe run in the high bay area and adjoining areas including the boilerhouse. The report was used to assist outside contractors in quote preparation as follows:

- o Strip all abandoned pipes in-place.
- o Remove all loose and deteriorated asbestos insulation.
- o Existing bare pipe and pipes that have been identified for stripping will be recovered with fiberglass insulation.
- o A plastic color coded PVC sealed jacket will be used to cover all existing asbestos (will be identified) and new insulation. Existing asbestos that is not deteriorated will be left in place and covered to prevent deterioration.

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All work will adhere to EPA standards and procedures. The contractor will also be responsible for bagging, identifying and removing all asbestos material from the Canton Plant including disposal at an approved disposal site. A manifest will not be required.

A cost breakdown indicates that labor costs will be \$83,400., material costs \$45,900., equipment costs \$17,600., and \$8,600. premium time to prevent production shutdowns. This office concurs with the proposed project and requests that a project be prepared as soon as possible while the contractor's quotes are still enforced.



J. M. Poe

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