



Inter Office

Manufacturing Staff

Mr. K. Termaat

May 14, 1980

Subject: Comments, General Managers Offices
Re Carcinogens Task Force Draft Report

Reference: Memorandum "Carcinogens Task Force Report"
G. O. Keutgen to distribution dated May 1, 1980

The following is a summary of the attached comments we have received so far from divisions (T&C, MSD, EED, CCD and PPVD). As other comments are received we will summarize and forward them to you promptly.

- o The report identifies in the outline appendices dealing with asbestos, chromium, and benzene; the chromium and benzene appendices were not included in the draft.
- o The Task Force recommendation to eliminate "Group A" uses of asbestos, chromium compounds, and benzene by Job 1, 1985, may lack sufficient time for long-range evaluation of selected alternative materials.
- o The report does not clearly state whether its recommendations apply only to current uses of identified substances or to existing uses as well (e.g., asbestos insulation already installed in plants).
- o The report recommends establishment of a Hazardous Substances Control Group within Stationary Source Environmental Control Office (SSECO), as did the Hazardous Substances Study conducted by P&O Staff last year. The report does not identify what manpower requirements might be needed to institute this program at divisions and plants.
- o Regarding recommendations Nos. 3 and 4, it is suggested that the following phrase be added after the word elimination: "..... or control where elimination is not technically or economically feasible."
- o Ethylene Chloropolymer (No. 6 on the task force prioritized Category I Substance (page 4F)) appears to be a mistake and should be Ethylene Chloromonomer as shown on Exhibit No. I.

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o Similarly, elimination of chromium compounds as well as all derivatives and input materials at the Monroe plating operations is not likely to occur without the development of alternative processes or product revisions to other materials.

The institution of controls related to employee exposure and handling will be the only feasible approach with some of these substances in the near future.

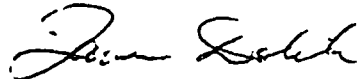
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A formalized procedure should be established to respond to carcinogenic concerns such as GM woodworkers' problem and manpower and investment cost should be identified for implementing the recommended actions.

- o The Plastics, Paint and Vinyl Division is no longer in the Van Dyke Plant so the reference on page 3f to the use of arsenic at the T&C Van Dyke Plant is not valid for 1980.
- o Consolidation of responsibility under one organization is desirable to provide a focal point for all communications dealing with carcinogenic material issues.
- o Review of the Generalized Workplan (Figure 20) shows twelve months for incorporating Group A actions; this may not be adequate in cases that require plant process/equipment changes.



Z. Dolik

cc P. F. Guy
W. N. Moore

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