



Inter Office

Engineering and Research Staff

March 10, 1980

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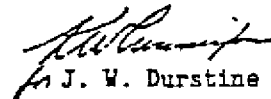
Subject: Strategy for Elimination/Accommodation of Asbestos from Company
Product Materials

The attached strategy was agreed to by the recently formed Task Force on Carcinogens in the Workplace and is patterned after NAAO CEPL #10. It responds, in part, to a need to identify NAAO/DPO production material uses of possible carcinogenic substances and to formulate action plans for eliminating or controlling them in a practicable manner in anticipation of government regulations.

Asbestos was selected by the Task Force as the first substance to be addressed by the Company. The recommendation is to eliminate, when feasible, the use of asbestos from Company products, and where not feasible, to control its use. The selection of asbestos was based upon recent policy statements by EPA that it plans to review all aspects of use of asbestos, including possible ban on certain uses under the Toxic Substances Control Act (TSCA) and the extensive use of asbestos in friction materials (e.g., clutch and brake components), gaskets, insulators, adhesives and sound deadeners. The attached strategy proposes a systematic approach to the elimination or accommodation of asbestos.

The strategy was approved by the Task Force consisting of representation from both affected line and staff activities.

Your concurrence or comments are requested by March 31, 1980 so that we may proceed with its implementation on a timely basis.


for J. W. Durstine

Attachment

Concur

Written Comments Attached

Want to Discuss

PRODUCED BY FORD

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STRATEGY FOR ELIMINATION/ACCOMMODATION OF ASBESTOS
FROM COMPANY PRODUCT MATERIALS

Current Situation:^{1/}

- . OSHA could tighten the standard from 2.0f/cc to 0.5f/cc. The lower standard was proposed in 1975 but has not been issued.
- . The EPA might ban asbestos for automotive uses on the grounds that, in their view, there are no "essential" automotive uses.
- . According to an article in a trade publication, G.M. is eliminating asbestos gradually; and has achieved a breakthrough on the application of alternate friction material to drum brakes.

Current Strategy:^{2/}

- . Newly designed components should not contain asbestos. When engineering constraints preclude substitution, asbestos may be used if encapsulated or resin coated.
- . Implicit: Continue use of asbestos in carryover designs and in service parts.

Proposed Strategy:

The three fundamental strategic alternatives are to:

1. Wait for government rulemaking before acting.
2. Eliminate the use of asbestos immediately.
3. Proceed now to eliminate/restrict asbestos use in new designs without waiting for rulemaking.

Alternative #3 is recommended because it will meet all likely regulatory requirements applicable to asbestos if implemented as described below. Specifically, it is proposed that the basic Company strategy for product materials be to completely eliminate asbestos (except for service and carryover parts) by the 1985 model year.

- Priority action shall be assigned to new designs. Service parts that now exist for past models and carryover parts shall await an EPA ruling on the requirement for substitutions. (Note: SSECO already has requested of the EPA that past models be exempted from the regulations.)
- Priority shall be given to friction materials and paper products, both of which have been selected by the EPA as initial candidates for analysis and possible rulemaking.

1/ Asbestos Assessment, by Vehicle Materials Development Planning, January, 1980.

2/ NAAO Engineering Practice CEPL-10, December, 1979.

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Proposed Strategy: (Cont'd.)

Accommodation will be permitted for those components for which no suitable and/or feasible substitutes now exist.

- . Asbestos may be considered when performance criteria or other engineering constraints preclude the use of alternative materials and are documented. In such cases, with approval of the responsible PEO/VEO chief engineer and the Vehicle VP, and the concurrence of Industrial Health and Toxicology, and Facility Environmental Engineering, the asbestos content must be reduced to the lowest practicable level and all asbestos must be encapsulated or resin coated to avoid/minimize worker exposure to airborne fibers.
- . Where accommodation is permitted, research/development efforts between Ford and supplier companies shall proceed on a priority basis to develop substitute materials as early as possible.

The foregoing is consistent with CEFL-10, Asbestos Content in Components.

Technical Assessment:

It is judged that the proposed strategy is technically practicable. Major development efforts should be focused on substitute friction materials. Semi-metallic disc brakes already are used on several passenger cars. Drum brakes, due to their design, present particular problems. Heavy Truck Engineering is now using semi-metallic drum brakes on some vehicles; in addition, HTE has under development a promising nonmetallic, nonasbestos composition for improved wear characteristics. Release for limited production is imminent.

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