



Rec 5-1-80

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Inter Office

Chassis Engineering

May 9, 1980

PLAINTIFF'S EXHIBIT

FD-961

To: J. W. Durstine
cc: G. E. Adams
Subject: Carcinogens Task Force Report

The report tends to indicate that strategies, work plans, etc. are in place at the Product Engineering Offices to develop substitutes for asbestos, chromium and benzene. While a preliminary start has been made, Company management should not be led to believe that there have been significant accomplishments. ✓

Under Recommendations in the Executive Summary (Page 2), Item #6 should include Group B as needing funding. ✓

The proposed actions on Page 13 cover the Group A applications; should not Groups B and C also be included? ✓

The comment in Exhibit II that Chassis does not participate is untrue. Chassis does not use Form 1464 since some of the required information is not readily available to Chassis Engineers and the form has been revised four or more times. Also, the Product Engineering Offices have no approved PEP 3-189. Chassis has forwarded to Engineering and Research Staff all information required for new material number assignments and approved source additions. ✓

Over-reaction to elimination of carcinogens must not prevent the Company from proceeding on an orderly basis. The strategy, " . . . to proceed to eliminate these three carcinogens by Job #1, 1985 . . . " seems to be rigorous and inflexible. A more extensive analysis of the effects of this strategy is needed. ✓

J. D. Velte

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EPF:ah

Please see attached marked-up pages.

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Strategy and Workplan

The search for asbestos, chromium compounds and benzene defined the number of parts and materials containing these substances as listed in the table below. Where possible, the applications were divided into three groups: A - Known substitute material without major redesign, B - Known substitute material with major redesign and C - No known substitute or advanced engineering required. The data is directional only. There remain many suspect applications which require time-consuming analyses for identification.

	Bulk Materials and Parts							
	Production				Nonproduction			
	A	B	C	Total	A	B	C	Total
Asbestos	34	49	22	105	8	-	-	8
Chromium Compounds	-	-	25	25	98	81	34	213
Benzene	-	-	15	15	3	-	5	8

Strategies have been formulated to eliminate or control these substances. The recommended strategy is to proceed now to eliminate these three carcinogens by Job #1, 1985, in light of competitive and regulatory pressures, and Company experience. Where elimination cannot be contained, institute controls on design, process and exposure. It is judged that the elimination timetable is practical for Group A asbestos, chromium compounds and benzene-containing parts and materials. For those applications requiring major redesign (Group B, e.g., drum brake linings) the elimination timetable would have to be adjusted to reflect Company cycle plans although G.M. has stated an intent to eliminate asbestos by 1985. Finally, where no known substitute exists (Group C), advanced engineering will have to be completed before a elimination timetable can be established.

A generalized workplan has been prepared on the basis of the evaluation of the carcinogens already referred to. The workplan requires central program management, with action implementation by NAAO/DPO Product Engineering Offices, Purchasing activities, Vehicle activities and the Manufacturing and Supply Staffs. It is judged that approximately a year is required to complete the sorting of the three carcinogens into the known substitute, major redesign and advanced project groups. It is judged that one additional year would be required to implement the most feasible product actions not requiring major redesign. Substitution requiring redesign would take 33 months for vehicle or major powertrain programs.

Recommendations

Achievement of the recommended strategy requires an integrated approach throughout the Company and a sustained effort over a number of years. The Task Force recommends:

1. Establish a Hazardous Substance Control Committee chaired by Environmental and Safety Engineering Staff. The Task Force would be discontinued.
2. Assign Carcinogen Program manager control responsibility to Environmental and Safety Engineering Staff.
3. Request Environmental and Safety Staff to establish carcinogen elimination timetables for the 67 known carcinogens for review and approval by the subcommittees. (The Task Force has requested General Managers and Chief Engineers to recommend directional timetables.)
4. Direct all affected organizations to proceed with the elimination of Group A asbestos, chromium compounds and benzene for Job #1, 1985.
5. Request that NAAO Product Engineering Offices and Manufacturing Staff present to the subcommittee specific action plans and timing for the Group A applications identified.
6. Provide advance program funding to develop designs and/or materials for new parts to identify reliability, cost and weight implications of alternative designs (Group C).
7. Adopt as the Company carcinogen listing the 67 current OSHA-regulated and proposed Category I substances. Establish the top eight priorities proposed by the Task Force as Company priorities.

See group B →
Drum Brakes (lin)

8. Secondary Effects — ie an item not hazardous to Ford Motor, nor to the customer, but hazardous somewhere in manufacturing

Engineering Staff - E&RS
Manufacturing Staff
May 2, 1980

cycle - have to take list on 0292

PROPOSED PRIORITY ACTIONS

Achievement of the recommended strategy to proceed now to eliminate OSHA Category I carcinogens by Job #1, 1985, with control of design, process and exposure where elimination cannot be contained, requires an integrated approach throughout the Company and a sustained effort over a number of years. The Task Force on Carcinogens in the Workplace recommends that:

1. Establish a Hazardous Substances Control Committee chaired by the Director - Environmental Control Office. The Task Force would be discontinued.
2. Assign Carcinogen Program Manager control responsibilities to the Compliance and Liaison Department, Environmental and Safety Engineering Staff.
3. Request Environmental and Safety Staff to establish carcinogen elimination timetables for the 67 known carcinogens for review and approval by this Subcommittee.
4. Request that NAAO/DPO Product Engineering Offices and Manufacturing Staff present to the Subcommittee specific action plans and timing for the Group A applications identified.
5. Adopt as the Company carcinogen listing, current OSHA regulated Category I substances (26) and proposed for regulation substances (41). Establish the top eight priorities proposed by the Task Force as Company priorities.
6. Direct all affected organizations to proceed with the elimination of Group A asbestos, chromium compounds and benzene by Job #1, 1985, as outlined in the workplan.

CARCINOGEN SEARCHMaterials and Toxicology System (MATS)

To overcome the deficiencies of manual and semi-computerized search methods, the Materials and Toxicology System (MATS), under development, will consolidate four materials approval systems into one common data base. The four systems are: the CATALOG of Hazardous Materials (P&O Staff) containing materials, their toxicological evaluation for worker/consumer protection and the chemical composition, the Engineering Material Approved Source List (E&RS) containing the material specification title and the materials approved to that specification; the Nonproduction Material Approved Source List (Manufacturing Staff) containing the nonproduction material standard and the approved materials; and the Environmental & Process Review System (Manufacturing Staff) containing the waste disposal, treatability, and facility engineering cautions on all materials approved to Engineering Specifications and Manufacturing Standards.

Carcinogen Search Strategy

Developing the links between the above systems will, in the future, provide a method for locating suspect carcinogens in nonproduction materials and production parts and bulk materials. The search methodology is numbered on the facing page to correspond to the following search steps:

1. The Chemical Abstracts Service numbers of the suspect carcinogens and its compounds are identified by IH&T. The system will then generate a list of materials which contain that chemical.
2. Utilizing the NAAO supplier code, the specification number and the product name, the system will then identify other suspect materials and specifications.
3. The Engineering Specification can then be passed to the North American Engineering Product Information System (NAEPIS) which contains the engineering notices from all of the product engineering offices. The NAEPIS system will then produce a cross-reference list of all parts which use that material.
4. The list of production parts can then be matched to Purchasing's Procurement system to determine current sources to be queried for control and elimination of carcinogens. The same list can be matched to the AAD Process Sheet system to determine where and how the part or material is handled in AAD.

Functions

The primary function of MATS is to maintain and produce the Approved Source List for non-production and production materials including the toxicology and environmental clearances for use by Purchasing. The system also produces the CATALOG of Hazardous Materials as either a full companywide print or as a plant specific print. The CATALOG is used by health and safety and plant doctors, and is required to be furnished to the UAW under the current contract. The system is also available to the plants and the Poison Control Center at the Rouge to be searched by supplier or specification for complete medical, handling, shipping, waste treatment and disposal instructions on a material.

The system also produces the Michigan DNR Critical Materials report for the consumption of materials which contain a Michigan defined "critical component" e.g., chromium.

Affected Activities

All Corporate Staffs concerned with materials/toxicological/environment controls are currently involved in using/developing the system. All NAAO/DPO plants are planned to have access to the system by third quarter 1980. All NAAO/DPO Engineering activities are also participating with the exception of Chassis which currently does not participate in material control as required by PEP 3-189.

May 2, 1980