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PLAINTIFF'S EXHIBIT

FD-1132

Inter Office

Ford Parts and Service Division

June 1, 1981

Mr. M. H. Hamberg

Subject: EPA/OSHA Asbestos Exposure Program

As requested, we have reviewed the attached slide-tape script and (2) brochures regarding asbestos poisoning and make the following comments:

- There is an inconsistency between the two brochures in the mention of brake vacuums. In the slide-tape script, pages 10, 11 and 12 refer to using a industrial or shop vacuum. Further emphasis for a shop vacuum designed for asbestos usage or a efficient filtering and disposal system, like that mentioned in the larger brochure would be appropriate.
- One popular brake cleaning method the program does not address is the coffee can method. This method is simply using a coffee can filled with parts cleaner solvent from the parts washer and brushing off the brake assembly holding the can under it. Because technicians are paid by the job (flat rate), cleaning a brake with a vacuum is not always done, even if the garage has the equipment; it becomes awkward, time consuming and costly. Brake washers are fine, but they are a fairly new product and there are few in use in the field. The coffee can method is used by technicians who are aware of asbestos poisoning but don't have the sophisticated equipment or take the time to use it. This paper should address this method and its' safety impact in areas such as solvent disposal (Do you pour down the drain or put it back in the parts washer?).
- Consider suggesting to Mr. Guimonda that the brochure and slide-tape refer to people who work on cars as technicians, rather than mechanics. This is a practice adopted by Ford and G.M. which technicians prefer.
- In the area of program effectiveness, the brochure suggests (pg. 74) displaying a poster to remind people of the dangers of asbestos poisoning. Because it is not readily available, the EPA might consider making a poster available and including it with the distribution of brochures. A poster hung in the garage area might prove to be the most effective reminder of the dangers of asbestos poisoning.

There are currently (4) four class action suits pending against Ford Motor Company for asbestos poisoning by former Ford dealer technicians. I suggest you review this material and your prepared response to EPA/OSHA with Wanda Jones (x42476) to assure it does not adversely effect those lawsuits.

D. E. Schwenk

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