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General Services

May 14, 1980

To: Mr. G. O. Keutgen

cc: Mr. J. W. Durstine

Subject: Carcinogens Task Force Report to E&R and M&S Sub-committees

General Services comments on the subject Report are:

- While the Report focuses on engineering materials usage, its conclusions and recommendations must apply to the broad range of product and non-product materials used in General Services operations. Our major need is for better communication of available information on carcinogens and other toxic and hazardous materials to the operating level. We require greater awareness of problem areas, assistance and information on possible solutions and to be kept up to date on new regulations. In particular, regular communication with and education for our safety personnel who are often the first to see the problems must have high priority.

- The Report correctly identifies the need for "an integrated approach throughout the Company and a sustained effort over a number of years" to carry out the recommended strategy for carcinogens. It appears that this might be a wise approach for the Company to all of its toxic and hazardous materials problems.

- We agree that Directive B-101 with its distributed responsibilities is now inadequate to carry out the strategy and should be redrafted. In particular, the functions of compliance and compliance reporting must be more closely aligned.

- Because complete elimination of useful materials like asbestos may not be in the best interests of the Company, it might be more prudent to stress awareness of the dangers and control measures than attempt to eliminate usage by fiat.

D. R. Learned
Director

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