

FILE NAME: Ford (FD)

DATE: 1980 May 8

DOC#: FD081

DOCUMENT DESCRIPTION: Memo - Carcinogens Task Force Report



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Inter Office

Car Engineering Group

May 8, 1980

To: J. W. Durstine ✓

cc: G. F. Bolling
T. J. Feaheny
G. O. Keutgen

PLAINTIFF'S EXHIBIT

FD-947

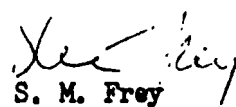
Subject: Carcinogens Task Force Report

You requested comments on the subject Carcinogens Task Force Report.

The general tone of the report is that strategies, work plans, programs, and timetables are in place in Engineering, to develop substitutes for asbestos, chromium and benzene. Although efforts have been started in these areas and you note some cautions and uncertainties I think the risks and timing problems associated with these efforts should be more greatly emphasized to company management. ✓

Another important point is that each of the 145 applications noted for asbestos, chromium, and benzene will require Engineering funding. The total will be substantial. Without additional funding or directed prioritization over other Engineering efforts this work cannot be done, particularly under the present economic and budgetary conditions. ✓

A final point is that while the company's obligation, insofar as carcinogens, is recognized, it is imperative that we do not over-react. A measured reaction is provided by CEPL-10 on asbestos. This was designed to provide substitute materials on an orderly basis, with the provision that engineering limitations might make some substitutions impractical (assuming we would continue to meet existing regulatory controls). Your strategy "...to proceed to eliminate these three carcinogens by Job 1, 1985, ..." appears to be too rigorous or inflexible. ✓ A more extensive and detailed analysis of the implication of the strategy is warranted.


S. M. Frey

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