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Inter Office

Steel Division

May 12, 1980

PLAINTIFF'S EXHIBIT

FD-938

Mr. G. O. Keutgen
Executive Director
Manufacturing Staff

Subject: Carcinogens Task Force Report to E&R and M&S Subcommittees

The subject report, issued on May 1, 1980, recognizes the U.S. Government's interest and role in regulating the manufacture, transportation, use, and disposal of hazardous substances. The recommended formation of a Hazardous Substances Control Committee is an appropriate step in formulating a coherent Company policy to deal with these substances. I believe that the Steel Division has a place on this committee. Steel Division personnel have been keeping abreast of developments in this area, especially as they affect coke ovens. Membership on this committee could allow the Division to more easily follow the development of government regulations as well as Company policy.

The Division has used the forerunner to the proposed Materials and Toxicology System (MATS) to complete critical materials report required each year by the Michigan DNR. Continued use of MATS will be necessary in the future as the list of critical and hazardous substances is expanded.

I question whether it is possible to completely eliminate usage and production of all 67 current OSHA-regulated and proposed Category I substances as recommended in the report. Specifically, the Division will always produce benzene (one of the top three priority substances) in the by-products area as long as the Division makes coke. Conceivably, other substances will be difficult, if not impossible, to eliminate.

P T Brosnahan

P. T. Brosnahan
General Manager

PTB/MSC/hs

cc: P. Jorgensen
V. H. Sussman

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