

REPRESENTATIVE PAST COMPANY ACTIONS (Fig. 3)

The Company has issued Directive B-101 which assigns responsibilities for Toxic/Hazardous material control. Product Engineering Procedure PEP 3-189 and Manufacturing Procedure ILd.1. provide for systematic review and clearance of new production and nonproduction materials.

Production Materials

In response to OSHA regulations issued in 1978, the Company removed lead chromates and lead molybdates from paint used for topcoats on exterior and interior surfaces, effective with Job #1, 1980. School bus yellow and fleet vehicles were excepted. Also, "Tris" flame retardant treatment for fabrics, was removed during 1977. In response to initial OSHA regulations in 1972, the Company determined plant areas in which employee exposure to asbestos exceeded regulated limits. All domestic line operations were apprised of the OSHA standards and the requirements for employee protection and medical examination. In 1979, Car Engineering released a practice banning new designs containing asbestos unless a documented rationale for its use is provided and it is encapsulated.

Nonproduction Materials

In 1969, sprayed-on structural steel fireproofing containing asbestos fibers was eliminated in all new and reworked construction. In 1970, Corporate mechanical construction standards were revised to prohibit asbestos in thermal insulation. Maintenance Bulletin No. 137 was published, prohibiting the use of air blow-off in all brake/clutch maintenance and substituted vacuum fiber/dust pick-up. Since 1973 new suppliers have been required to furnish complete compositional data to obtain clearances prior to use in the plants. In 1974, Steel Division light oil by-product tanker loading operations were reviewed and personnel exposures were pinpointed and appropriate protective equipment supplied. In 1977, the Company replaced M-2C60 Series of maintenance lubricants with lead naphthenate free M-2C142 materials, and deleted the use of asbestos containing molding compound for heater housings at Sheldon Road. In 1978, an adhesive used at San Jose was reformulated to eliminate benzene exposure. During 1979, analytic chemistry procedures at Central Laboratories were revised to eliminate benzene, where possible. The volume of lead-chromate employed in vinyl plant operations was reduced and ventilation/protective measures were identified at the Romeo Tractor Plant to minimize potential hazards from chromium compounds used in painting.

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