



6 JUN 80 11 52

-K.B. TERMAAT

PLAINTIFF'S
EXHIBIT
FD-517

Inter Office

Personnel and Organization Staff

June 3, 1980

Mr. K. B. Termaat

Subject: Carcinogenic Chromium Compounds in Materials

Reference: Termaat to Toth Inter Office dated 4-9-80 -- Same Subject

As you know, "witch hunt" is able to identify products in the "catalog" containing specific chemicals listed by CAS#. All forms of chromium identified to us by suppliers and listed in the "catalog" have been previously listed in a "witch hunt".

The Industrial Relations Bulletin entitled "Toxicology", Bulletin #26 (copy attached), addresses the potential hazards associated with metals. Information in this Bulletin acknowledges that certain metal products present insignificant risk in their anticipated use, handling and disposal (irrespective of any chromium content). Such materials would not be addressed in the "catalog" since 1291 Forms would not normally be required as indicated in Bulletin #26.

Paul E. Toth, Manager
Industrial Hygiene and
Toxicology Department
Employee Health Services

Attachment

8001 1816

SCF-FORD-1995

INDUSTRIAL RELATIONS BULLETIN

DATE	BULLETIN NO.	DEPARTMENT	BULLETIN NO.
3/31/80	Toxicology	Ind. Hyg. & Toxicology	26
SUBJECT	Potential Hazards and Clearance Procedures for Metals (MA Materials)*	NEW	

The following precautionary measures, guidelines, and procedures shall be followed for Metals in the class mentioned above.

I. Materials Requiring Precautions But Not Forms 1291 and 68-100

Materials in classes:

M1A	Ferrous
M2A	Non-Ferrous
M3A	Tool, Die & Equipment Steels
M5A	Wire, Spring Steel
M6A	Electrical
M7A	Anodes
M8A	Bearing Metals
M9A	Shot & Grit

can be expected to present little or no hazard, except as described below, in their intended use, handling and storage. No Material Health and Safety Data Sheet - Form 1291, or Environmental Data Sheet - Form 68-100, need be submitted for these materials at this time.

Possible Hazards:

Processing these materials may present hazards where grinding, melting, cutting, welding or other operations produce fumes, dust, smoke or other products of attrition which may enter the breathing zone of employees. Fumes or dust from those operations generating such, can be expected to contain not only the base metal and its oxide (e.g. iron oxide, zinc oxide, lead, aluminum oxide, nickel, nickel oxide, etc.) but also measurable amounts of other metals and non-metals used as alloys or coatings (e.g., vanadium, chromium, arsenic, beryllium, lead, antimony, etc.). Such materials if inhaled in sufficient concentration may lead to adverse pulmonary and/or systemic health effects.

Precautionary Measures:

For those processes where fume, fine particulate, etc., may be generated and inhaled by employees, ventilation must be adequate to maintain the concentration of all airborne contaminants within acceptable limits. Additionally, certain metals (e.g., antimony, chromium) may present skin hazards (dermatitis) especially in the finely divided state. Protective gloves and other garments may be necessary in the handling of metal fines.

A determination of adequacy of workplace ventilation during processing of these materials can be performed by the Industrial Hygiene Services Section of the Industrial Hygiene and Toxicology Department. Plant Engineering Office - Manufacturing Staff can assist in determining feasibility and design criteria for ventilation.

6401 1817

PRODUCED BY...

Disposal:

Metals in these classes should be recycled as metallic scrap whenever possible. Unrecyclable scrap can be disposed of in a approved sanitary landfill. Disposal of metal fines into plant sewer systems is not an acceptable practice. Plant Engineering Office - Manufacturing Staff (PEO) can be contacted for information on solid and liquid waste management. Stationary Source Environmental Control Office (SSECO) - Environmental and Safety Engineering Staff should be contacted regarding any question on applicable environmental regulations.

II. Materials Requiring Forms 1291 and 68-100

Materials in classes:

- M4A Metals Welding, Brazing and Fillers
- M10A Powders, Metal
- M11A Solders
- M12A Lubricant, Solid Film

require that Forms 1291 and 68-100 be submitted. The primary concern with these four classes of "Metals" is that because of their nature and/or intended use there is a significant probability that, without proper precautions, they will enter the work environment as dust or fume in excess of acceptable limits. Ingredients such as, but not limited to, chromium, cadmium, vanadium, beryllium, arsenic, lead, nickel, and zinc can present unreasonable risk to employees and/or the environment without proper controls.

The controls to prevent excessive inhalation and skin contact with these materials as well as any periodic monitoring, record keeping, medical examinations, etc. which may be required by law will be indicated in the material review where applicable, as new products are proposed for these classes.

Due to the composition and nature of these materials, restrictions may be placed on their disposal. It must be recognized that the concentration of certain constituents may classify the "Metal" as a hazardous waste. Disposal of metal fines in plant sewer systems is not an acceptable practice. Contact PEO for information on solid and liquid waste management. SSECO should be consulted regarding questions on applicable environmental regulations.

Note:

The information above does not apply to combustion (thermal decomposition) products resulting from subjecting these products to overheating or fire situations.

Products of combustion from these materials will vary in quality and quantity depending on temperature rise, oxygen available, amount combusted, and volume in which material is combusted.

Specific concerns related to hazards of combustion products, should they arise, should be addressed to Industrial Hygiene and Toxicology.

* Manufacturing Staff, Office of General Counsel, Environmental and Safety Engineering Staff, and Engineering & Research Staff concur with this bulletin.