

The Office

Cor Engineering Group

November 6, 1979

Mr. J. W. Harrison

cc: Mr. L. Anderson
Mr. J. Belling
Mr. C. Feeney

Mr. C. MacDonald
Mr. L. Macool
Mr. L. Bailey

Re: Cor Engineering Practices Letter Concerning Asbestos

Re: Your letter, same subject, dated October 31, 1979

Several problems exist with your assessment and subsequent recommendation against adoption of a CEF for Company usage of asbestos.

The current regulatory scenario is more complex than stated in your letter. Four or more regulations will be adopted by the Federal Government before the end of 1979. The first, issued September 25, 1979, is a general government-wide policy issued by the Interagency Regulatory Liaison Group (IRLG), and is intended to be a "trigger" for subsequent regulation. The EPA cancer policy was issued October 10, 1979 and contains proposed rules for regulation of various carcinogens. OSHA and EPA cancer regulations will be issued before the end of the year.

It is readily apparent that there will be a drive to reduce asbestos consumption in the United States, and that the four "cancer releases" will ultimately result in the elimination of asbestos. The EPA has already stated their intent for regulation as follows: wear emissions, asbestos cement water pipes, and paper products (gaskets).

As we focus on brake materials, it is reasonably certain that GM will use only asbestos-free brakes by 1985. Competitive pressures are therefore an additional reason for "getting our house in order". As stated in the first paragraph of the CEF, our intent is to develop alternate materials to facilitate an orderly transition to non-asbestos substitutes as the need arises. Continued proliferation of asbestos is not in the best interests of the Company.

Continued use of asbestos is responsible for proper anticipation of, as well as reaction to, asbestos which will affect product design. It is necessary, therefore, that we continue to evaluate our asbestos use. The proposed CEF will accomplish this by providing a framework for asbestos use. It will also provide for the development of alternate materials. It will also provide for the development of alternate materials.

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