

PLAINTIFF'S
EXHIBIT

G-239

TO: ME Panarites

cc: PS Hanke
JD Lynn
GB LeRoy
WF O'BrienFROM: BR Hughes, Senior Chemist
Chemical Laboratory

December 1, 1977

RE: Material Safety Data Sheets

General Motors Corporation

This has reference to our recent conversation regarding the detailed information requested by General Motors on the attached Material Safety Data Sheets.

As I pointed out to you, General Motors has modified Section 2 of the standard OSHA form to require complete disclosure of all ingredients in the product rather than listing only so-called hazardous ingredients. I am attaching as Item #1 a copy of the standard OSHA Form 20 and as Item #2, a copy of the Material Safety Data Sheet used by the supplier of our aerosol products. Note the difference in the Section 2 requirements between these forms and the General Motors form.

Attached as Item #3 is the type of ingredient listing we would have to provide to fully comply with Section 2 of the General Motors form. This particular listing is for Style 604 as requested by L.R. Sementilli's letter of 10/17/77. I seriously doubt that we want to disclose to this extent. Also, information is requested on Style 681 which we purchase and resell and I don't know how much formulation information they will disclose to us.

It appears to me that there are several courses of action we can take in handling these General Motors forms:

1. Disclose all ingredients as requested on the form.
2. Refuse to fill out the forms at all on the basis that we are not required to by law.
3. Fill out and submit a standard OSHA Form 20 (see Item #1, attached) which would require only disclosure of hazardous ingredients like asbestos.

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4. Fill out the General Motors form, but provide only minimum information on composition, perhaps a general description of the product. For Style 604, instead of the listing shown on Item #3, attached we might say:

"Style 604 consists of brass wire inserted commercial grade asbestos impregnated with a white natural rubber compound. Exact composition is considered confidential. Style 604 contains about 42% asbestos by weight".

Please note that on the reverse side of the General Motors forms there is a statement that we give General Motors permission to use or disclose any data provided in any way. I have discussed this with J. Lynn and he advises that, if we do fill out the General Motors form, we should cross out this statement.

Please advise action you wish taken.



Harold R. Hughes:nw

Attachments