



PLAINTIFF'S EXHIBIT

FD-1940

Inter Office Communication

May 12, 1972

Mr. E. Eichen
Electrical and X-ray Optics
Research and Engineering
Scientific Building

Subject: Asbestos Sample Evaluation for Occupational Safety and Health Act (OSHA)

Since the Occupational Safety and Health Act of 1970 became law, there have been promulgated rules and regulations related to the control of airborne contaminants encountered by employees during the normal course of their work. Although the basic Act stipulates that rules and regulations are to be promulgated for monitoring, recording, posting, and informing employees of their hazardous work conditions along with other requirements, we are just now seeing specific detailed regulations by which we must abide appearing in the Federal Register.

Of immediate concern is control of asbestos dust in those industries and operations where there is a potential for this type exposure among the working population. At Ford we have potential exposures at our Sheldon Road heater and air-conditioner housing operations and at other plants among a certain number of maintenance personnel involved in asbestos insulation.

One aspect of the present OSHA requirement is a change in technique used for determining asbestos dust concentrations. Whereas in the past dust concentrations were determined with the aid of a conventional light field microscope technique, it is now required that a phase contrast microscope at a 400-450 magnification be used for this determination.

Since we do not have a phase contrast microscope, the cooperation of your office has permitted us to make preliminary determinations of asbestos dust exposure with your equipment and personnel. However, it was our understanding from the beginning of these studies that you were not in a position to provide us with services on samples collected during routine monitoring.

At present, in order to determine potential hazards where asbestos is encountered in product manufacturing as well as maintenance applications, an initial evaluation of approximately 150 samples is required. The number required thereafter is not known at this time but would depend a great deal on the findings in our initial study. However, we do know if a proposed regulation presently submitted to the Department of Labor by the National Institute of Occupational Safety and Health is accepted and put into law, we would be required to monitor areas of potential asbestos exposure on an annual basis. Areas found to exceed the minimal accepted criteria would have to be monitored on a quarterly basis until appropriate control measures reduced exposures. In our opinion, this would mean evaluating approximately 300 samples per year (this does not take into consideration sampling requirements we may encounter for disc brake assembly operations presently proposed for our Van Dyke Plant).

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Mr. E. Kichen

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Your past cooperation in assisting us to evaluate collected asbestos dust samples has been greatly appreciated. Please advise whether or not your office is in a position to continue providing this evaluation on a routine basis considering the number of samples that may be involved.

Paul E. Toth, Supervisor
Industrial Hygiene Unit
Environmental Health Section
Employee Health Services Department

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