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Inter Office

Supply Staff

July 22, 1977

Mr. D. T. Axon

cc B. B. Murray

Subject: Proposed OSHA Rule of .5 Airborne Asbestos Fiber/cc -  
M. R. Lower's July 14 Communication to L. M. Chicoine

In response to your request, the following are comments relating to M. R. Lower's July 14 communication to L. M. Chicoine pertaining to airborne asbestos:

- Brake linings, gaskets, seals, and raw asbestos were referenced by Lower. Clutch facings were not mentioned but offer development challenges which may exceed brake linings development challenges.
- The letter does not mention the NIOSH .1 fiber/cc recommendation which would effectively put us out of the asbestos business.
- The communication does not have a recommendation to proceed with programs to develop non-asbestos parts which is not consistent with NAAD forward plans which state:

"Proposed new OSHA standards (.05 to 1.0 fiber/cc) for airborne asbestos exposure may force suppliers to cease production of asbestos brake and clutch linings and gasket materials. NAAD Purchasing established a program to expedite development of alternate materials" (see attached D. P. Crutty to D. T. Axon note).

- Lower concludes the letter by saying, "It, therefore, is unlikely that we would encounter a sudden and unpredictable cutoff in the supply of asbestos bearing products" which implies that further action is not required.

As Engineering activities estimate that three to five years are required to develop asbestos-free parts, what will the Company do if we are given one year, or two years (which is not "a sudden unpredictable cutoff"), to meet the NIOSH .1 fiber/cc proposal?

Mr. Lower's conclusion tends to leave the impression that we need not concern ourselves with the asbestos problem which is probably not his intent.

As all suppliers contacted stated there will probably be a program by OSHA to continually lower allowable airborne asbestos contaminants and as a major supplier (Raybestos) has a published policy to phase out of asbestos, Supply Staff should encourage budgeting funds for asbestos-free parts development programs. It is not necessary to proceed with crash programs, but we should be aware that within an undefined period of time, possibly two-five years, that we will likely have extreme controls relating to the manufacture of asbestos containing parts.

D. P. Crutty

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