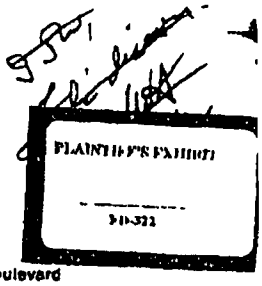


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Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
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Mrs. Joni T. Repasch
Record Clerk
Office of Toxic Substances (TS-793)
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, D.C. 20640

December 14, 1979

Subject: Commercial and Industrial Use of Asbestos Fibers

Reference: 44 FR 60061, October 17, 1979: ANPRM under TSCA.
Docket Number: OTS-61005

Dear Mrs. Repasch:

Reference is made to the October 17, 1979 Federal Register (44 FR 60061), which solicited comments from interested parties concerning the subject Advanced Notice of Proposed Rulemaking. Transmitted herewith are our preliminary comments. We reserve the right to submit additional information to EPA as we may become aware of additional asbestos-related information.

It is noted that EPA anticipates that most asbestos regulatory action, if any, will be taken under Section 6(a) of TSCA. This Section is concerned with the regulation of chemical substances manufactured, processed, distributed in commerce, used or disposed of. EPA suggests that it may issue regulations under Section 5(a) of TSCA involving manufacture of new chemical substances or new use of existing chemical substances. We further note that possible candidates for early regulatory action include certain friction products, of which brake linings constitute the largest single product within the friction product subcategory. Of these, EPA proposes that automobile and light truck brake linings will be initial candidates for analysis and possible rulemaking.

Ford Motor Company uses asbestos-containing materials in the form of brake linings and other friction products as well as gasket materials, and insulating materials. Actions are being initiated by Ford to investigate asbestos substitutes in sealers and fillers as well as in other products. Although we are not in a position at this time to provide details, we may well be able to address such matters in early 1980.

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With respect to any regulations which are to be developed, it is essential that adverse impacts on asbestos users be minimized. We agree with EPA that implementation schedules, if required, allow for reasonable transition to substitutes and orderly phase-out of asbestos processing equipment. Considering the present degree of uncertainty concerning the relative hazards of asbestos and its potential substitutes, care must be taken to see that any action taken to force a substitution for asbestos produce an assured health benefit to balance the known socio-economic costs.

Peculiar to our industry is the fact that past model replacement components have to be supplied to consumers for many years after production may have ended. It follows therefore that any regulation phasing out asbestos components for motor vehicles be geared to a specific future model year rather than to parts manufactured after a specific effective date. Of major concern are friction materials such as brake pads/linings and clutch discs. We believe that such past model parts should be exempt from any regulation phasing out or banning asbestos products. If "grandfathering" were not to be allowed, a monumental task of past model vehicle testing and recertification with non-asbestos components would be required. Availability of past model replacement parts for the consuming public must not be jeopardized by regulation.

You have indicated that information and comments provided by Ford and others under provisions of TSCA are to be taken into account by the Consumer Product Safety Commission, when tailoring requests for information. To the degree this is done we agree that the potential reporting burdens on industry should be reduced. This is particularly important when information gathering under TSCA Section 8(a) is initiated.

Yours very truly,

A. B. M. Houston, Manager
Compliance and Liaison Department
Stationary Source
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