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Dale E Dawkins
Director - Vehicle Compliance and
Safety Affairs

October 12, 1992

Mr. John W. Melone, Director
Chemical Control Division
United States Environmental Protection Agency
Washington, D.C. 20460

RE: Phase Out of Asbestos in New Vehicles

Dear Mr. Melone,

Chrysler Corporation submits the following response to your inquiry dated September 1, 1992 regarding our plans for the phase out of asbestos material in new vehicle applications. Our policy is unchanged relative to the phase out of this material in our vehicles. We have been replacing asbestos with other materials as new vehicles and components are developed. However, it is impractical to substitute non-asbestos materials in some current applications, such as certain existing vehicle brake systems, because the other non-asbestos materials have not met necessary performance requirements in these specific applications.

The EPA has stated that substitute materials are readily available for all asbestos applications and that they are comparable, if not superior, in performance and competitive in price. Chrysler Corporation has found this is not always correct, as we have some current brake system designs where non-asbestos materials were tested; and when evaluated, they did not meet the comparable performance or cost objective that asbestos materials now achieve. In these cases, it would have been necessary to redesign the entire brake system of an existing vehicle to meet regulatory and corporate performance (ie., stopping distance, fade resistance, wear, noise and pedal feel/quality) requirements. This redesign would create increased development and tooling costs and added lead time requirements.

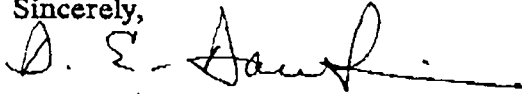
Chrysler Corporation will continue to reduce the usage of asbestos containing materials as we support the EPA policy to progressively eliminate this material in automotive applications. However, all asbestos containing materials will not be eliminated until suitable substitutes are found for specific applications of vehicle brake systems. We commend the EPA for believing that regulation may be unnecessary if voluntary compliance is achieved, but we are concerned about a significant cost advantage that foreign imports may develop if environmental concerns with asbestos are relaxed.

Chrysler Corporation
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Highland Park, MI 48288-0857
313 858 5098

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If you have additional questions concerning this response, please contact Mr. Len Blazic of my staff at (313) 956-5365.

Sincerely,



D. E. Dawkins

cc: Ms. B. T. Day