FILE NAME: Ford (FD)

DATE: 1985 Mar 15

DOC#: FD245

DOCUMENT DESCRIPTION: Letter to EPA RE Proposal to Commence Rulemaking on Asbestos Brakes

bcc: D. M. McCarthy
D. L. Block
R. J. Donnellon
H. Epstein
J. R. Kasmarick
R. E. Maugh

Sent 3/15/85
US Mail 4pm
Dearborn

V. H. Sussman, Director
Stationary Source Environmental Control
Environmental and Safety Engineering

Ford Motor Company
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

March 15, 1985

1995

U.S. Environmental Protection Agency
TSCA Public Information Office (TS-793)
Office of Toxic Substances
401 M Street, SW - Room E-107
Washington, D. C. 20460

Attention: Document Control No. OPTS-211015

Subject: EPA Proposal to Commence Rulemaking on Asbestos Brakes

Reference: December 19, 1984 Federal Register
40 CFR 763--49 FR 49311-49313

Docket Clerk:

Transmitted herewith are comments submitted by Ford Motor Company in response to the EPA request for public comment on this issue. Our submittal supplements the comments being submitted by the Motor Vehicle Manufacturers Association of the United States (MVMA).

Ford Motor Company is not in the brake manufacturing business. We purchase all of our brake systems and parts, both for the assembly of new vehicles and for the aftermarket, from outside manufacturers and suppliers. Whether the "purchased in assembly" parts are used in Company-built cars, light trucks, medium trucks, heavy trucks, agricultural tractors, construction tractors, or for the aftermarket, all of the friction components -- be they pads or shoes -- are manufactured by others.

Our suppliers tell us that they are now in the process of phasing out the use of asbestos in the friction products that they supply to us. We understand that by 1990, most if not all of these products will be asbestos-free; as new car and truck lines are phased in, asbestos-containing systems are being phased out. Despite some technical problems that remain, we understand that good progress is being made.

JAS125

FAFD1 2255

PLAINTIFF'S EXHIBIT FD-49

One particular problem that concerns us and that we feel must be highlighted is the continued availability of asbestos-containing parts for vehicles currently in production, or no longer in production, which employ such parts. Ford Motor Company, through its Parts and Service Division, is a major marketer of aftermarket disc and drum brakes and related brake system parts.

Currently, the Company's aftermarket parts distribution system has on hand some 51,000 asbestos brake parts in stock at eight depots in the U.S. and Canada. These parts involve 192 different brake system designs. We supply these parts (mostly pads, shoes, discs, and drums) for cars and trucks produced by the Company between 1957-1985 -- a period of 28 years. It is imperative that parts for these vehicles continue to be available to our dealers and customers for the remainder of the product's useful life, and that any regulatory program envisioned by EPA not interfere with that need.

Car and truck brakes are sophisticated systems made up of parts which are carefully matched to function compatibly with each other, so as to provide appropriate braking characteristics for their vehicles under a wide range of operating conditions. A brake system is not simply a collection of disparate parts -- pads, shoes, discs, drums, etc. The pads and shoes of car and truck braking systems that use asbestos friction materials have very different properties from the pads and shoes of those that do not contain asbestos. One cannot simply use a non-asbestos substitute brake shoe in conjunction with a drum that was designed for an asbestos-containing friction material. Likewise, a disc brake that was designed for a semi-metallic friction material will not perform satisfactorily if an asbestos-containing pad is substituted. A whole host of performance, noise, durability, and other problems may occur if a friction material is introduced into a system which was not designed to employ it.

In considering whether to regulate the use of asbestos in brakes, EPA must be sensitive to this crucial issue. It would be neither cost-effective nor constructive for EPA to force the complete redesign of car and truck brake systems at enormous costs for currently-produced vehicles, or for out-of-production vehicles, for which the consuming public rightfully expects that aftermarket parts will remain available for routine maintenance service at reasonable cost. We thus strongly recommend that EPA not seek to regulate the use of asbestos in the brakes of vehicles which currently are being manufactured, or which formerly were manufactured, with asbestos-containing brake systems.

Very truly yours,

JSA125.1

FAFD1 2256