



Ford Motor Company
Environmental and Safety
Engineering Staff

330 Town Center Drive
Dearborn, Michigan 48126

November 9, 1992

Mr. John Malone, Director
Chemical Control Division
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Malone:

The following is Ford's response to the questions EPA raised in its September 1, 1992 letter to Mr. DeWain Belote.

- "1. Are asbestos-containing parts still included in new vehicles?
2. What parts still contain asbestos?
3. How extensively are asbestos-containing parts used? For example, what percent of the market?"

Ford has limited the use of asbestos to less than 15% of Ford's 1993 cars and trucks. The only asbestos application remaining are rear drum brake linings where the technical challenge continues to be the development of a non-asbestos material that provides customers with acceptable performance.

- "4. Are asbestos-containing parts being phased out?
5. What is the schedule for phasing out of asbestos containing products?
6. What are your company's views on continuing the phase out of asbestos?"

Ford's policy and supporting product plans include replacement of all asbestos in its products with non-asbestos substitutes that will provide customers with acceptable levels of performance, reliability and quality. It is anticipated, barring any unforeseen technical issues, that asbestos will be totally phased out of Ford products over the next several model years.

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While we are aggressively pursuing elimination of asbestos in Ford products, Ford's toxicology experts have concluded that asbestos in product use, when encapsulated to prevent release of airborne fibers, does not present a health risk. These experts however, believe materials that are acceptable substitutes for asbestos will possess some of the physical and chemical properties of asbestos. Therefore, asbestos substitutes should be treated with the same care as asbestos itself.

- "7. How will the phase out of asbestos in new vehicles affect the use of asbestos-containing replacement parts in the aftermarket? Will the aftermarket automatically phase out asbestos as new vehicles phase out asbestos, or will asbestos replacement parts continue to be used as cheap substitutes for non-original equipment?"

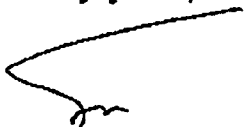
It is Ford's understanding that the long term availability of asbestos will be dramatically curtailed both domestically and abroad. Suppliers of asbestos indicate they will continue to support OEM manufacturers only as long as specific asbestos-containing products remain in production and may require "one-time-buys" for subsequent replacement part inventories. Given the possibility of scarce availability of asbestos manufacturing sources later in the decade, Ford does not believe "asbestos replacement parts [will be] cheap substitutes for non-original equipment" either by OEM or after-market replacement part suppliers.

Ford will continue to provide non-asbestos parts as replacement for non-asbestos OEM parts. The use of non-asbestos vs asbestos parts however, usually requires changes to other components in brake systems to maintain acceptable performance, reliability and quality. Accordingly, Ford has no present plans to develop and test non-asbestos substitutes for asbestos presently used in its brake replacement parts. With regard to other than brake replacement parts, non-asbestos containing replacements for asbestos parts may or may not be provided depending on inventory levels and availability of acceptable non-asbestos substitutes. In any case, maintaining acceptable levels of performance, reliability and quality, not cost, will be the primary factor that determines asbestos or non-asbestos usage.

- "8. How will one company's phase out of asbestos affect the company competitiveness in the domestic market and in the international market vis-a-vis another company, foreign or domestic, that does not phase out asbestos?"

Ford has long believed that the phase out of asbestos from its products will not threaten its world-wide competitive position because its non-asbestos bearing products will continue to provide customers with acceptable levels of performance, reliability and quality.

Very truly yours,


Thomas G. Spear
Executive Engineer
Vehicle Safety Assurance

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Ford Motor Company
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330 Town Center Drive
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December 22, 1992

Mr. John Melone, Director
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Washington, DC 20460

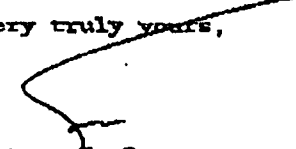
Dear Mr. Melone:

On November 9, 1992, Ford Motor Company responded to the questions EPA raised regarding Ford's current and future use of asbestos. In response to EPA's question, "what parts still contain asbestos?", it was stated that rear brake drum linings were the only asbestos containing parts in 1993 Ford vehicles.

We have recently determined that Ford's response is technically incorrect in that several 1993 Ford vehicle lines identified as having asbestos containing rear brake drum linings, in fact, are equipped with front brake asbestos containing components. These vehicles with asbestos containing front brake components were, however, correctly considered in Ford's response to EPA's questions pertaining to: 1) the percent of 1993 Ford vehicles with asbestos containing parts and 2) Ford's schedule for phasing out asbestos containing parts.

We are sorry for any inconvenience this oversight may have caused.

Very truly yours,


Thomas G. Spear
Executive Engineer
Vehicle Safety Assurance

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