



PLAINTIFF'S EXHIBIT

FD 2005

Ford Motor Company

The American Road
Dearborn, Michigan 48121

May 6, 1983

U.S. Environmental Protection Agency
P.O. Box 2070
Rockville, Maryland 20852

Subject: TSCA: Reporting Commercial and Industrial Uses
of Asbestos (Secondary Processing)

Ref.: EPA Letter dated January 21, 1983
47 FR 33198 of July 30, 1982 (40 CFR 763 Subpart D)

Dear Sir:

In accordance with applicable EPA requirements, we enclose herewith EPA Form 7710-36 in respect of the Ford Ypsilanti Plant in Michigan.

To the best of our knowledge and information, this plant is a "secondary processor" of asbestos and is the only plant subject to these reporting requirements.

Yours very truly,

J. S. Amber
Principal Facility Environmental
Control Engineer
Stationary Source Environmental
Control Office
Telephone: 313/322-4646

Enclosure
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C. PRIMARY PROCESSOR PRODUCTION

Enter the following information for each type of end product that you shipped from your plant site. Classify your end products according to the list below.

End product shipped (Name and end product) per brief (1)		Type of asbestos fiber (Name and brief per material type)	Year	Quantity of asbestos consumed (Short tons) (2)	Product phenomena				Continued sheet (3)
Code number	Generic name	(1)			Total annual production (1)		Value shipped (Thousands of dollars) (1)		
					Domestic	Exports	Domestic	Exports	
N/A		☐ Chrysotile	☐ Amphibole	1979					
		☐ Crocidolite	☐ Tremolite	1980					
		☐ Actinolite	☐ Actinolite	1981					
Continued		☐ Chrysotile	☐ Amphibole	1979					
		☐ Crocidolite	☐ Tremolite	1980					
		☐ Actinolite	☐ Actinolite	1981					
Continued		☐ Chrysotile	☐ Amphibole	1979					
		☐ Crocidolite	☐ Tremolite	1980					
		☐ Actinolite	☐ Actinolite	1981					

100. Estimate the percentage of the total value shipped from the plant site reported here as primary processor production in 1981.

Asbestos Mixture Product Sales categories

Product name	Unit of measure	Asbestos mixture products	Unit of measure	Product name	Unit of measure
01. Cement and paper	Short tons	01. A/C pipe and fittings	Short tons	21. Sheet gaskets (other than flange gaskets)	Sq. yards
02. Substitutes	Short tons	02. A/C sheet (flat)	Sq. yds.	22. Packing	Short tons
03. Substitutes	Short tons	03. A/C of pipe, corrugated	Sq. yds.	23. Panels and surface coatings	Sq. yds.
04. Fiberglass cloth	Short tons	04. A/C sheet	Sq. yds.	24. Adhesives and sealants	Short tons
05. Substitutes	Short tons	05. A/C sheet (corrugated)	Sq. yds.	25. Adhesives (epoxy resins)	Short tons
06. Substitutes	Short tons	06. A/C sheet (corrugated)	Sq. yds.	26. Adhesives (epoxy resins)	Short tons
07. Substitutes	Short tons	07. A/C sheet (corrugated)	Sq. yds.	27. Adhesives (epoxy resins)	Short tons
08. Substitutes	Short tons	08. A/C sheet (corrugated)	Sq. yds.	28. Adhesives (epoxy resins)	Short tons
09. Substitutes	Short tons	09. A/C sheet (corrugated)	Sq. yds.	29. Adhesives (epoxy resins)	Short tons
10. Substitutes	Short tons	10. A/C sheet (corrugated)	Sq. yds.	30. Adhesives (epoxy resins)	Short tons
11. Substitutes	Short tons	11. A/C sheet (corrugated)	Sq. yds.	31. Adhesives (epoxy resins)	Short tons
12. Substitutes	Short tons	12. A/C sheet (corrugated)	Sq. yds.	32. Adhesives (epoxy resins)	Short tons
13. Substitutes	Short tons	13. A/C sheet (corrugated)	Sq. yds.	33. Adhesives (epoxy resins)	Short tons
14. Substitutes	Short tons	14. A/C sheet (corrugated)	Sq. yds.	34. Adhesives (epoxy resins)	Short tons
15. Substitutes	Short tons	15. A/C sheet (corrugated)	Sq. yds.	35. Adhesives (epoxy resins)	Short tons
16. Substitutes	Short tons	16. A/C sheet (corrugated)	Sq. yds.	36. Adhesives (epoxy resins)	Short tons
17. Substitutes	Short tons	17. A/C sheet (corrugated)	Sq. yds.	37. Adhesives (epoxy resins)	Short tons
18. Substitutes	Short tons	18. A/C sheet (corrugated)	Sq. yds.	38. Adhesives (epoxy resins)	Short tons
19. Substitutes	Short tons	19. A/C sheet (corrugated)	Sq. yds.	39. Adhesives (epoxy resins)	Short tons
20. Substitutes	Short tons	20. A/C sheet (corrugated)	Sq. yds.	40. Adhesives (epoxy resins)	Short tons

D. SECONDARY PROCESSOR PRODUCTION

Enter the following information for each type of end product that you shipped from your plant site. Classify end products and asbestos mixtures consumed according to the lists on this form.

End product shipped (Name and product per brief)	Year	Total annual production		Asbestos mixture consumed and form	Function of asbestos in product	Year	Annual consumption of asbestos mixture			Continued Sheet (2)
		Quantity	Unit of measure				Quantity	Unit of measure	Value shipped (Thousands of dollars)	
Motor Commutator	1979	6,200,000	pieces	34 Phenolic Transfer Moulding Compound pieces	Insulator	1979	4,700,000	pieces	250.7	
	1980	2,200,000	pieces			1980	4,700,000	pieces	250.7	
	1981	2,300,000	pieces			1981	4,700,000	pieces	250.7	
Continued										
Continued										

100. Estimate the percentage of the total value shipped from the plant site reported here as secondary processor production in 1981.

Type of forms for products made from asbestos mixtures

Product name	Unit of measure	Asbestos mixture products	Unit of measure	Product name	Unit of measure
01. Sheet gaskets (other than flange gaskets)	Sq. yards	01. A/C pipe and fittings	Short tons	21. Sheet gaskets (other than flange gaskets)	Sq. yards
02. Substitutes	Short tons	02. A/C sheet (flat)	Sq. yds.	22. Packing	Short tons
03. Substitutes	Short tons	03. A/C of pipe, corrugated	Sq. yds.	23. Panels and surface coatings	Sq. yds.
04. Fiberglass cloth	Short tons	04. A/C sheet	Sq. yds.	24. Adhesives and sealants	Short tons
05. Substitutes	Short tons	05. A/C sheet (corrugated)	Sq. yds.	25. Adhesives (epoxy resins)	Short tons
06. Substitutes	Short tons	06. A/C sheet (corrugated)	Sq. yds.	26. Adhesives (epoxy resins)	Short tons
07. Substitutes	Short tons	07. A/C sheet (corrugated)	Sq. yds.	27. Adhesives (epoxy resins)	Short tons
08. Substitutes	Short tons	08. A/C sheet (corrugated)	Sq. yds.	28. Adhesives (epoxy resins)	Short tons
09. Substitutes	Short tons	09. A/C sheet (corrugated)	Sq. yds.	29. Adhesives (epoxy resins)	Short tons
10. Substitutes	Short tons	10. A/C sheet (corrugated)	Sq. yds.	30. Adhesives (epoxy resins)	Short tons
11. Substitutes	Short tons	11. A/C sheet (corrugated)	Sq. yds.	31. Adhesives (epoxy resins)	Short tons
12. Substitutes	Short tons	12. A/C sheet (corrugated)	Sq. yds.	32. Adhesives (epoxy resins)	Short tons
13. Substitutes	Short tons	13. A/C sheet (corrugated)	Sq. yds.	33. Adhesives (epoxy resins)	Short tons
14. Substitutes	Short tons	14. A/C sheet (corrugated)	Sq. yds.	34. Adhesives (epoxy resins)	Short tons
15. Substitutes	Short tons	15. A/C sheet (corrugated)	Sq. yds.	35. Adhesives (epoxy resins)	Short tons
16. Substitutes	Short tons	16. A/C sheet (corrugated)	Sq. yds.	36. Adhesives (epoxy resins)	Short tons
17. Substitutes	Short tons	17. A/C sheet (corrugated)	Sq. yds.	37. Adhesives (epoxy resins)	Short tons
18. Substitutes	Short tons	18. A/C sheet (corrugated)	Sq. yds.	38. Adhesives (epoxy resins)	Short tons
19. Substitutes	Short tons	19. A/C sheet (corrugated)	Sq. yds.	39. Adhesives (epoxy resins)	Short tons
20. Substitutes	Short tons	20. A/C sheet (corrugated)	Sq. yds.	40. Adhesives (epoxy resins)	Short tons

E. IMPORTATION OF ASBESTOS MIXTURES

Enter the following information for each type of asbestos mixture that you imported in 1981. Classify your imports according to the lists on sheet E & D.

Asbestos mixture (Name and product per brief)	Year	Asbestos mixture consumed in 1981		Year	Total annual imports			Continued Sheet (2)
		Type of asbestos	Quantity (Short tons)		Quantity	Unit of measure	Value shipped (Thousands of dollars)	
N/A		☐ Chrysotile						
		☐ Amphibole						
		☐ Actinolite						
Continued		☐ Chrysotile						
		☐ Amphibole						
		☐ Actinolite						
Continued		☐ Chrysotile						
		☐ Amphibole						
		☐ Actinolite						

U.S. Form 7710-06-01 (11-81)

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U.S. ENVIRONMENTAL PROTECTION AGENCY				COMPANY NAME AND ADDRESS (Name as reported in item 1 on page 1)				
REPORT OF COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS Continued				Ford Motor Company Ypsilanti Plant 128 Factory Street Ypsilanti, MI 48197				
9. IMPORTATION OF ARTICLES CONTAINING ASBESTOS COMPONENTS								
Enter the following information for each article that you imported in 1981. Classify your imports according to the lists in section C or D.								
Article Name (Enter one article per line) (1)		Total annual imports (2)				Asbestos component(s) (Name and lbs per component) (3)		
Code number	Generic name	Year	Quantity	Unit of measure	Value U.S. Dollars			
	N/A	1979						
		1980						
		1981						
		1979						
		1980						
		1981						
		1979						
		1980						
		1981						
10. EMPLOYEES								
Record the number of employees at the reporting site in each of the categories below. Count each employee in one category only.								
						Number of employees	Continued Sheet (2)	
(1) TOTAL number of employees at plant site (Sum of 2, 3, 4, and 5)						2,153		
(2) Number of production employees						3		
(3) Number of employees in shipping, receiving, and moving						2		
(4) Number of maintenance employees						39		
(5) Number of other employees						2,109		
11. SUMMARY OF CURRENT WORKER EXPOSURES								
This section requires you to report, by category of production workers, the arithmetic mean of the 8 hour time weighted average (TWA) and ceiling concentration exposure levels for all employees at the reporting site. Report for all employees for whom you have determined TWA and ceiling according to each production line making the reported products. The instructions include a worksheet for making necessary calculations (see App.).								
End product (Enter name) (1)	Responsible activity (2)	Production work category (3)	Number of employees (4)	8 hr time weighted average				
Code number	Generic name			Arithmetic mean of 8 hr time weighted average (TWA) (5)	Standard deviation (6)	Total number of measurements (7)	Number of non-detectable measurements (8)	Ceiling concentration level (9)
	Not applicable	Other operations (includes all employees working in area including transporters)						
		Other operations (includes all employees working in production area of mill)						
	Primary processors	Four introduction operations includes handling, mixing, bag opening, bagging, weighing, etc.						
		Other mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.						
	Primary processors and secondary processors	Dry mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.						
		Other production employees						
142	Motor Controller	Four introduction operations includes handling, mixing, bag opening, bagging, weighing, etc.						
		Other mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.						
	Primary processors and secondary processors	Dry mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.	3	0.07	0.04	8	0	0.001-0.15
		Other production employees						
	Primary processors	Four introduction operations includes handling, mixing, bag opening, bagging, weighing, etc.						
		Other mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.						
	Primary processors and secondary processors	Dry mechanical operations includes machinery, bagging, drying, cutting, grinding, pulverizing, screening, etc.						
		Other production employees						
(11) Sampling and analysis methods:								
☒ Mark this box if you use the NIOSH method to sample airborne concentrations of asbestos fibers in the workplace and analyze measurements (See NIOSH Pub. No. 75-127).								
If you utilize other sampling and analysis methods, enter the appropriate codes for these methods listed in the instruction booklet under part I.								
(12) Enter the lowest detectable level of the measurements that your company expects to attain by the sampling and analysis methods (Measurements below this level should be considered as "non-detectable" for the purposes of this rule)							0.001 fibers/cc	
1. MEASURING ASBESTOS EMISSIONS OR FIBER COUNT								
EPCRA Form number			NJ 0003280			Date		
						6-30-80		
☐ Yes enclosed is a separate report for the section concerning measuring asbestos emissions.								
☒ No separate report.								

EPA Form 7710-20 (6-12-80)

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J. WASTE AND DISPOSAL

Enter the following information for each end product you report in section B(1) C, and D. If you cannot provide information by end product, provide information based on the form of waste (column 2).

End product (1)	Form of waste (sludge, slurry, dust or other, byproduct, trash, or specify other) (2)	Total annual quantity of substance in waste (Short tons) (3)	Percentage of total substance (4)	Disposal site (5)			Functional equivalent to solid waste? (6)	Method of disposal (7)	Landfilled (8)
				Type of land disposal of facility (See instructions) (5a)	Location (5b)	Ownership (5c)			
142 Motor Commutator ☐ End product report ☒ Form of waste report	Fines and Scrap	0.1	40 %	☒ Surface impoundment ☐ Waste pit ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ High level waste	☐ On site ☒ Off site	☐ Company ☒ Private ☐ Municipal	☒ Yes ☐ No	Material shoveled off floor into gondola container, and transferred to trash compactor prior to landfill disposal.	
☐ End product report ☐ Form of waste report			%	☐ Surface impoundment ☐ Waste pit ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ High level waste	☐ On site ☒ Off site	☐ Company ☐ Private ☐ Municipal	☐ Yes ☒ No		
☐ End product report ☐ Form of waste report			%	☐ Surface impoundment ☐ Waste pit ☐ Land treatment ☐ Land fill ☐ Storage facility ☐ High level waste	☐ On site ☒ Off site	☐ Company ☐ Private ☐ Municipal	☐ Yes ☒ No		

(7) You may describe in a separate enclosure any steps you take to ensure that waste does not cause adverse effects.

☐ Yes enclosed is a separate description of waste disposal practices.

☒ No separate report.

K. POLLUTION CONTROL EQUIPMENT

On separate lines enter information about each piece of air pollution control equipment used to control particulate emissions of your plant and

☐ Confidential

Unit number (1)	Type of equipment (See index) (2)	Gas stream volume and temperature (3)	Equipment type (See index) (4)	Estimated collection efficiency (Percent) (5)	Annual operating schedule (hrs/year) (6)	Material sent to land treatment or disposal (Pounds) (7)	Source of emissions (8)	Source of chimney? (9)	Special problems? (10)
	Temperature		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Volume		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Temperature		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Volume		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Temperature		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Volume		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Temperature		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Volume		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Temperature		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	
	Volume		☐ Designated ☒ Actual		hrs/yr	Pounds		☐ Yes ☒ No	

(11) Estimate the percent of plant exhaust or that is treated by the equipment listed above.

0 %

Comments of item number:

Item K6 - Method of disposal reported reflects practices to date. Effective immediately all waste asbestos will be wetted, placed in plastic bags and shipped in 55-gallon drums.

Item K11 - There is no exhaust stack and no pollution control equipment associated with this operation.