

FILE NAME: General Motors (GM)

DATE: 1992 Oct 8

DOC#: GM049

DOCUMENT DESCRIPTION: Letter to EPA from GM

GENERAL MOTORS CORPORATION

1660 L STREET, N. W.
WASHINGTON, D. C. 20036

October 8, 1992

Mr. John W. Melone, Director
Chemical Control Division
Environmental Protection Agency
401 M St, SW
Washington, D.C. 20460

Dear Mr. Melone:

This responds to the questions posed in your September 1, 1992 letter concerning General Motors use of asbestos-containing products. Your questions and our responses are as follows:

Are asbestos-containing parts still included in new vehicles? What parts still contain asbestos?

Asbestos rear drum brake linings are used on a limited number of General Motors 1993 passenger car models. No other asbestos-containing parts or components are currently used on General Motors vehicles.

How extensively are asbestos-containing parts used? For example, what percent of the market?

For the 1993 model year, it is estimated that approximately 20% of GM's total North American vehicle production will be equipped with asbestos-containing rear drum brake linings.

Are asbestos-containing parts being phased out? What is the schedule for phasing out asbestos-containing products?

The use of asbestos-containing products in GM vehicles has been declining for a number of years. Although future product plans are proprietary and

subject to change, it is anticipated that all new GM vehicles will be asbestos-free within the general time frame specified in the now vacated EPA rule.

What are your company's views on continuing the phase out of asbestos?

As indicated above, our current plan is to continue the phase out of asbestos on GM vehicles. As GM and others stated during the asbestos rulemaking proceedings, the objective data demonstrates that the use of asbestos in motor vehicle brake linings does not pose a risk to public health or safety. Nevertheless, the tremendous investment cost of converting to non-asbestos has been largely expended, and we plan to complete the conversion given the regulatory uncertainty surrounding asbestos.

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 a cheap substitute for non-asbestos original equipment?

With regard to the products that GM produces and distributes for aftermarket service, it is our intention to provide non-asbestos parts to be used for servicing non-asbestos OEM parts. We do not know what third-party aftermarket suppliers might do.

On a related note, it continues to be GM's position that asbestos-containing OEM brake linings should be serviced with asbestos-containing replacement linings. At the OEM level, the conversion to non-asbestos brake linings is accompanied by a redesign of other brake components in an effort to optimize overall brake

system performance. Using non-asbestos brake linings as replacements parts in vehicles that were originally designed with asbestos-containing linings will result in brake system performance compromises that range from modest customer dissatisfaction (from brake noise, for example) to significant stopping distance penalties. The servicing of asbestos-containing OEM linings remains an issue that the EPA should address.

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

An automotive company that chooses to phase out asbestos could incur a competitive disadvantage relative to another automotive company that does not phase out asbestos. The disadvantages could include the large investment costs required to convert to non-asbestos, variable cost penalties of non-asbestos versus asbestos, and potential customer dissatisfaction related to noisy brakes, reduced lining life, etc. These competitiveness considerations would likely hold true regardless of the country-of-origin of the manufacturers or the markets in which the vehicles are sold.

I hope the above information is helpful to you. If you have further questions, please call Phil Horton, General Motors Automotive Safety Engineering, on (313) 947-1738.

Sincerely,

Edward M. Kavjian, Jr.

Edward M. Kavjian, Jr.
Industry-Government Relations
General Motors Corporation