



Mercedes-Benz

King County Commission
For Marketing Recyclable Materials
400 Yasier Building, Room 200
Seattle, WA 98104
USA

Rerefined Engine Oil

Dear Sir or Madam,

Many thanks for your letter of 7th November to our department VSE/PB.

We would like to comment on your questions as follows:

For several years now we have used products which have a rerefined content as "factory fill" products for our passenger car engines. At certain times differing amounts of rerefined content were in use for various reasons.

If these rerefined oils are manufactured correctly, there is then no reason not to use them. We approved the use of rerefined engine oils for use in our engines decades ago. The requirement is, above all, that the rerefining process is perfect and the oils are alloyed correctly just like virgin base oils.

We check the performance of engine oils. It is left to the customer if he then uses a mineral oil-based, rerefined, synthetic, partly synthetic or hydro-cracked oil.

We hope that these details are of use to you.

Yours sincerely,
Mercedes-Benz Aktiengesellschaft



Mercedes-Benz

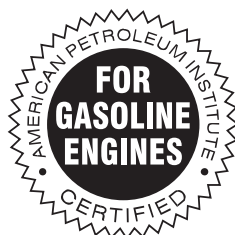
**CHRYSLER CORPORATION
POSITION ON RE-REFINED ENGINE OILS**

The engine oil used in Chrysler vehicles must meet the Owner's Manual recommendation to satisfy warranty requirements. This recommendation is to use an oil displaying the American Petroleum Institute Certification Mark (shown below). It must also be the SAE viscosity grade appropriate to the temperature, as shown in the Owner's Manual.

Oils that display this registered mark on the front of the container are certified to meet all the requirements of the International Lubricant Standardization and Approval Committee (ILSAC) GF-1 standard for engine oil. This specification does not differentiate between products made from virgin base oils or re-refined base oils. The marketer of the product must make sure that not only the initial product, but every batch of oil, meets the requirements of this specification.

Oils made from re-refined base oils can meet these requirements; however, not all of them do. By careful control of re-refining and blending processes, some marketers produce good quality oils from re-refined base oils. These are acceptable for use under the Chrysler New Vehicle Limited Warranty. Low or inconsistent quality oils may cause engine damage not covered by warranty.

Chrysler encourages the proper disposal and recycling of used oil to preserve natural resources and the quality of the environment. Recycling is encouraged by the purchase and use of these products.





Ford Motor Company position on engine oils made with re-refined base oils

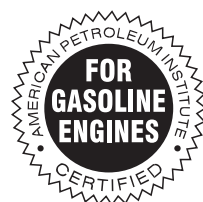
Ford Motor Company does not specify the type of base oils to be used for engine oil meeting Ford's requirements. Regardless of the origin of the base oils, a non-Ford engine oil is acceptable for use if manufacturing and quality control practices ensure the oil continuously meets Ford's performance requirements

Ford recommends using engine oil meeting Ford Specification ESE-M2C153-E and licensed as CERTIFIED FOR GASOLINE ENGINES by the AMERICAN PETROLEUM INSTITUTE (API Certification). Both virgin and re-refined engine oils are capable of meeting these requirements by qualifying against a series of rigorous tests designed to ensure their suitability for modern gasoline engines. While these tests confirm a specific sample of the oil qualifies with acceptable performance, it is the responsibility of the oil marketers to ensure that their products meet the requirements consistently and continuously.

In general, vehicle operation, adjustments and maintenance procedures, such as oil changes, performed contrary to recommended manufacturer specifications may, but do not automatically, void the applicable warranty. Each warranty claim is reviewed on its own merits. If, however, the use of a non-Ford product causes or contributes to the failure of a Ford component, the cost of repairing the affected component is not covered by the Ford vehicle warranty. In such cases, the vehicle owner would have to look to the seller or installer of the non-Ford product for the replacement of the affected components and for any related damage to the vehicle.

Based on recent engine oil market surveys, Ford has concerns that some engine oils made with re-refined base oils may not consistently meet Ford's engine oil requirements. Test results show viscosity characteristics and low temperature performance of some engine oils made with re-refined base oils are unacceptable. However, there are other engine oils made with re-refined base oils which have met API Certification requirements and have met viscosity and low temperature characteristics.

Customers considering the use of engine oils made with re-refined base oils should be aware that the final product quality may vary if improper manufacturing controls are used. Marketers of engine oils made with re-refined base oils must adhere to standards for their base oils which ensure variations in re-refining processes or incoming raw materials do not adversely affect performance. In addition to a standard for the base oil properties, it is Ford's view that a re-refined oil produced with stringent manufacturing controls and batch to batch testing of low temperature viscosity performance and other significant characteristics would comply with Ford's recommendations.



Look for this
CERTIFICATION MARK



General Motors Position on Use of Re-refined Engine Oils

General Motors recommends for use in its vehicles engine oils which meet the performance requirements specified in the latest International Lubricant Standardization and Approval Committee (ILSAC) Minimum Performance Standard (currently ILSAC GF-1), and which are certified by the American Petroleum Institute for use in gasoline engines. Such oils may be identified in the marketplace by looking for the Certification Mark Shown below on the front of the engine oil container.

Engine oils meeting these requirements can be made with either virgin or re-refined base oils. In both cases it is the oil marketer's responsibility to ensure that the product satisfies the performance requirements specified above both during initial product approval, and during the time that the product is being manufactured for sale. It is particularly important that steps be taken by marketers of engine oils made from re-refined base oils to ensure that variations in re-refining processes or raw materials do not adversely affect oil performance.

General Motors encourages the use of properly qualified re-refined products which consistently satisfy recommended performance requirements as a means of conserving vital petroleum resources. Use of re-refined products that have not been properly qualified or do not consistently meet performance requirements, however could result in engine damage, and could harm the reputation of all re-refined products. Engine damage caused by the use of an engine oil which does not meet the recommended performance specifications may not be covered by the General Motors new vehicle warranty.

Look for this
Certification Mark

