

1 They provided some information, didn't they,
2 about the -- they provided some information about the
3 asbestos exposures that they found. And for trucks
4 and in the area called background samples, truck brake
5 service, they actually measured the amount of asbestos
6 in the air, 10 feet, 25 feet and even 60 feet away
7 from where grinding work was being done, correct?

8 A Yes.

9 Q And they found 1.2 fibers, 1.7, 1.0, .6, and
10 as far away as 60 feet away from where the grinding
11 was being done, the fibers were .2 in the air,
12 correct?

13 A Yes.

14 Q And you are aware, are you not, that OSHA
15 has -- the Occupational Safety and Health
16 Administration has found that even at .2 fibers per
17 cc, cases of asbestosis will be expected to occur?

18 A Yes, but we also need to remember that the
19 Mount Sinai group used the rub-out technique to
20 prepare the fibers which is not a standard procedure.

21 Q Well, let's look at -- since you mentioned