

Sayers

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2 Q. This seems to be written by somebody
3 written A.E. Pufahl. Who was he?
4 A. He was Peter Cheston's immediate boss.
5 Q. Where was he located?
6 A. In 270 Park Avenue.
7 Q. In New York City?
8 A. Yes.
9 Q. So that's the home office and the
10 headquarters of Union Carbide was at the time?
11 A. It was then, yes.
12 Q. And someone has -- then there's a stamp
13 on it that says "received February 9, 1968, by T.F.
14 Frangos. Who is that?
15 A. Tom Frangos was the link man between the
16 U.S. office and the New York office.
17 Q. Do you know why it would have taken him
18 two years to get a copy of this?
19 A. No idea.
20 Q. Does that strike you as odd?
21 A. I really can't pass comment.
22 Q. Then somebody has written on it in
23 handwriting "asbestos toxicology." Do you know who
24 wrote that on here?
25 A. I have no means of deciphering that at

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2 all.
3 Q. You don't recognize that handwriting?
4 A. Not at all.
5 Q. In this particular letter it sounds like
6 your boss's boss from New York is telling your boss
7 that here's some things that he ought to do; right?
8 Would that be fair to say?
9 A. I'm trying to find the actual points.
10 (Pause.)
11 A. Yes, I do remember reference to patch
12 tests.
13 Q. Here he says that he plans to review the
14 notes with Ian Sayers. That's you; right?
15 A. Yes.
16 Q. Do you remember those notes being
17 reviewed by you?
18 A. Not specifically. But if Peter Cheston
19 had received this, we would have talked about it.
20 Q. Now, in the third paragraph it says,
21 "We" -- and by "we" I assume he means Union
22 Carbide -- "are planning some extraction studies
23 and analyses...by techniques employed at South
24 Charleston."
25 Do you see that?

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2 A. Yes, I do.
3 Q. Do you recognize South Charleston as a
4 Union Carbide facility in Charleston, South
5 Carolina, or in Charleston, West Virginia?
6 A. I think it was West Virginia. I
7 actually visited that plant once.
8 Q. So that was located in Charleston, West
9 Virginia?
10 A. It looks like it, yeah.
11 Q. Do you know what tests he's talking
12 about there?
13 A. I believe so, yes. Some asbestoses had
14 been shown to contain 3,4-benzopyrene.
15 Q. You recognize 3,4-benzopyrene as the
16 sort of toxic chemical compound?
17 A. I have no idea whether it was toxic.
18 Q. Well, if it wasn't toxic, why would
19 Dr. Dernehl be writing a statement about it, do you
20 think?
21 MR. WILL: Objection to the form of the
22 question. You're asking him to speculate.
23 A. I stand by what I just said. I have
24 no idea whether it was toxic.
25 Q. You recognize the fact that there was

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2 some sort of health issue involved here and that's
3 why a statement was going to be appropriately
4 written by Dr. Dernehl?
5 A. Yes.
6 Q. Because he, of course, was the medical
7 doctor and the associate medical director of Union
8 Carbide in New York; right?
9 A. Right.
10 Q. Do you have a copy of Dr. Dernehl's
11 statement?
12 A. No, I haven't.
13 Q. Did you ever see it?
14 A. I can't recall that. It's too long ago.
15 Q. I want to take you back to Exhibit
16 Number 7, which was marked earlier this morning.
17 Perhaps you can find a copy of it there. This is a
18 letter of June 7th, 1967, addressed to Dr. Thomas
19 Hall.
20 A. Yes.
21 Q. This is from Union Carbide Corporation
22 at 270 Park Avenue, New York; is that right?
23 A. That is correct, yes.
24 Q. And it's from the medical department
25 there at the headquarters of Union Carbide?