

NO. 95-04-1728-D

COPY

MANUEL P. GONZALEZ : IN THE DISTRICT COURT OF
 vs. : CAMERON COUNTY, TEXAS
 OWENS-CORNING FIBERGLAS : 103RD JUDICIAL DISTRICT

VIDEOTAPED DEPOSITION OF RICHARD SCHMIDT

taken on the 19th day of September, 1997, beginning
 at 9:40 a.m., at the law offices of Matthiesen &
 Chase, L.L.P., 3303 Eleven Greenway Plaza, Houston,
 Texas, before Karen A. Russell, a Certified Shorthand
 Reporter and Notary Public in and for the State of
 Texas, pursuant to notice and the following
 agreements of counsel:

IT WAS AGREED by and between counsel for the
 respective parties hereto that the deposition would
 be taken in accordance with the Texas Rules of Civil
 Procedure.



deputist. B. & R.

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25

I N D E X

Testimony of Richard Schmidt

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1 THE VIDEOGRAPHER: This is the
2 videotaped deposition of Richard Schmidt
3 taken September 19th, 1997, starting at
4 approximately 9:39 a.m. We are on the
5 record.

6
7 RICHARD SCHMIDT,
8 having been first duly sworn on oath, testified as
9 follows:

10
11 EXAMINATION

12
13 BY MR. ERWIN:

14 Q Would you state your full name for the record,
15 please, sir?

16 A Richard Schmidt.

17 Q Mr. Schmidt, have you ever worked for ARMCO?

18 A Yes, I have.

19 Q And when did you work for ARMCO, sir?

20 A August 1st of '74 through, I think it was
21 December the 2nd of '83.

22 Q And where did you work for ARMCO?

23 A Here in Houston, Texas.

24 Q And is that the Houston Works steel plant
25 facility?

1 A That's correct.

2 Q And in what capacity did you work at the ARMCO
3 Houston Works facility?

4 A I began as an industrial hygiene engineer and
5 then moved into employee relations group.

6 Q How long were you an industrial hygiene engineer,
7 sir?

8 A Approximately three and a half years.

9 Q So from 1974 through the better part of 1977 or --

10 A Yes, actually into 1978.

11 Q -- '78. Sorry, my math wasn't very good. So
12 basically '74 to '78?

13 A That's correct.

14 Q Okay. Now, had you worked anywhere before ARMCO?

15 A Only while I was in college. I worked part-time
16 jobs.

17 Q Okay. So the ARMCO industrial hygiene position
18 was the first position you had out of college?

19 A That's correct.

20 Q When you first came to work at ARMCO, did you
21 receive any particular training in the field of
22 industrial hygiene?

23 A Several things happened. I was sent to some
24 courses that were designed to help me learn more
25 about industrial hygiene. One of them in

1 particular was the NIOSH 550 course which is a --
2 I believe it's a two-week course that was held
3 here in Houston. I went through some Texas
4 Safety Association courses. They provided for me
5 a correspondence course with our insurance
6 carrier. I don't remember what the insurance
7 carrier's name is, but out of Baltimore. And it
8 was a correspondence course helping me to
9 understand the facets of industrial hygiene.

10 Q And then as you stayed at ARMCO for those almost
11 five years, did you receive any additional
12 training other than that initial training that
13 you just mentioned?

14 A There was training that the company held itself,
15 both internally at the Houston Works and through
16 conferences that were held by the corporation
17 either in Middletown, Ohio. There was another
18 one for a week long in Kansas City, Missouri. So
19 there was a number of informal-type training
20 sessions, also.

21 Q And when you say "informal," you mean because
22 they were inside the company?

23 A Right, or it could have been, you know, someone
24 who is more experienced in industrial hygiene,
25 giving some training to how to do sampling or

1 some other, again, just small, I call informal
2 training, how to calibrate the machinery, things
3 of this nature.

4 Q Now, did you attend any meetings of industrial
5 hygienists groups outside of ARMCO other than
6 what you've told us?

7 A Yes. I joined the local chapter of the American
8 Industrial Hygiene Association, which is a
9 professional group and attended some of their
10 meetings. And I just thought about it, I also
11 went through some training to become certified,
12 which I did not, but at that time is when I moved
13 on into another area of employment. But I did
14 take some training also through American
15 Industrial Hygiene Association local chapter.

16 Q Okay. Since leaving ARMCO -- well, strike that.
17 Could you briefly explain for the jury how
18 the industrial hygiene department -- if it was
19 called that -- at the Houston Works plant was set
20 up?

21 MR. WATERS: Let me object as leading
22 as asked.

23 Q (By Mr. Erwin) Mr. Schmidt, how was the
24 industrial hygiene department at Houston Works
25 set up?

1 MR. WATERS: Let me object that it
2 assumes lack of foundation.

3 MR. ERWIN: You can answer.

4 A I was hired in to be an industrial hygiene
5 engineer at the safety department which has been
6 called the safety industrial hygiene department
7 and there was also another safety engineer and a
8 supervisor of safety. Just when I first got
9 there, there was also a third safety person who
10 then moved into the workers' comp area. So
11 basically the department was set up of -- I guess
12 that would be the four of us. There was also a
13 medical department with a physician who was there
14 half a day and there were industrial nurses who
15 were around the clock seven days a week.

16 MR. ERWIN: Okay.

17 MR. WATERS: Object to the
18 nonresponsive portion.

19 Q (By Mr. Erwin) So at the Houston Works the
20 industrial hygiene was part of the safety
21 department?

22 MR. WATERS: Objection. Leading.

23 Q (By Mr. Erwin) Is that right?

24 A That's correct.

25 Q Okay. Who was your supervisor at the Houston

1 Works?

2 A Burke Hueber.

3 Q Okay. And his title was?

4 A Supervisor of safety.

5 Q Okay. And were y'all located in the same
6 physical building or how did that work?

7 A Yes. We had our own building which was safety
8 and medical combined.

9 Q Okay. Did you gain an understanding while you
10 worked there about how long a safety department
11 had been out at the Houston Works?

12 MR. WATERS: Objection. Calls for
13 hearsay.

14 A I just know that the safety department had been
15 there a good while before I had. The people who
16 were on board when I was hired had been there
17 several years prior to my time including, again,
18 the one safety engineer that moved into workers'
19 comp who had been with the company many, many
20 years, 20-plus years.

21 MR. WATERS: Objection.

22 Responsiveness.

23 Q (By Mr. Erwin) And did I hear you say there was a
24 medical department at the facility when you came
25 on?

1 A Yes.

2 Q And what did that involve, who was staff there?

3 A There were actually a team of doctors. There was
4 a group, Dr. Jones and Hambrick and they rarely
5 were there both at the same time. They split
6 time out of their practice to cover the plant for
7 half a day.

8 Q And in addition to the doctors were there any
9 other health care professionals there?

10 A Right. There were industrial nurses there, as
11 many as two or even three sometimes on the first
12 shift and at least one on all the other shifts
13 around the clock. And there was also a lady who
14 was an X-ray technician who worked part-time
15 there and part-time in our department later on.

16 Q Okay. And was the medical department in a
17 separate facility from the facility in which you
18 worked?

19 A It was a -- there's separate rooms, but connected
20 by hallway between where the safety offices were
21 and where the medical department was located.

22 Q So in the same building?

23 A Yes.

24 Q Okay. About how many employees were working at
25 the plant at the time you were there?

1 A When I went to work in '74, there were
2 approximately 4,800 employees total.

3 Q And did that number stay the same between 1974
4 and '78?

5 A It fluctuated some. There were some reductions
6 in force when business changed then people were
7 recalled when it came back.

8 Q If you could, sir, could you describe in your own
9 words what you understood and what you observed
10 the ARMCO safety program to encompass at the
11 Houston Works facility.

12 MR. WATERS: In, I guess, '74 to '78?

13 MR. ERWIN: Yes, yes.

14 A When I went to work there, there was a program in
15 effect called Accident Prevention Fundamentals
16 and always referred to as APF. And it was a
17 multifaceted safety program which involved how to
18 investigate accidents, how to prevent accidents,
19 how to do investigations and meetings and things
20 of this nature. It was a -- also a training
21 program as well as an active program.
22 Individuals who were employed in the company --
23 superintendents, general foremen -- were asked to
24 do the training for new supervisors that came on.
25 So it became kind of a perpetual program in that

1 census, that it was passed on from those who had
2 been with the program before to the ones who
3 became the new supervisors coming on.

4 Part of that program also involved monthly
5 meetings called the central safety committee
6 meetings where members of management got together
7 with the works manager. He was the chairman of
8 that committee, and each month would be either a
9 different type of topic to be covered to make
10 sure that we handled that between that point and
11 the next meeting and also to discuss what our
12 ongoing problems were at that time and to discuss
13 statistics in terms of number of accidents and
14 where they were occurring and what type of
15 accidents were occurring and to discuss what kind
16 of programs we could do to prevent those things.

17 Q What level of management attended the central
18 safety committee monthly meetings?

19 A It was held or it was chaired by the works
20 manager who was the top official at the company
21 and attended by all levels of management down to
22 the general supervisor level. So that would be
23 general supervisor, superintendent. And there
24 was a title, also, at that time called area
25 superintendent and could be as many as 30 people

1 new standards that were being developed. This
2 was really the infancy of OSHA and we were kind
3 of learning the process along with everyone else.

4 MR. WATERS: Objection to the
5 nonresponsive portion.

6 Q (By Mr. Erwin) Were there, to your knowledge
7 during the time you were there at the plant, Mr.
8 Schmidt, any sort of safety materials that were
9 prepared and delivered to the employees, the work
10 force at the Houston Works?

11 A Oh, there was a number of different programs. We
12 had programs where summer safety was an example
13 of that because we noticed that there were an
14 increase in the number of accidents during the
15 summertime, and so we would have handouts that
16 would go as a part of the supervisors' monthly
17 safety meeting each month. There was things for
18 family safety to take home with them, again, if
19 someone was -- during the summertime might be on
20 operating your lawn mower or might be on
21 operating your individual boats or things of that
22 nature. Just whatever the topic was that fit the
23 time and what was going on at the plant maybe.

24 I can't think of anything real specific
25 other than, again, like lawn mowers or boating

1 I saw him in the plant, he would approach me and
2 maybe say something about a circumstance that he
3 was aware of or that somebody maybe had made him
4 aware of. It was -- there was no real formal
5 program on that respect.

6 There were occasions where I'm sure he
7 filed some grievances. I have to go by my memory
8 here. I don't remember one specifically, but I
9 know there -- there were some safety grievances.

10 Q If he made -- you mentioned the informal contacts
11 you had with him. If he made an observation or
12 informal complaint, as you were stating it, did
13 you make it your practice to follow up on it?

14 A I would say yes, yes.

15 Q And certainly if a grievance of some sort was
16 filed, was that followed up, as well?

17 MR. WATERS: Objection. Leading.

18 A Well, there was a formal process for a grievance
19 which was a part of the union contract, so if it
20 went into a grievance procedure, then it had to
21 be answered at the first or second step by the
22 supervisor in the area and if it went to the
23 third step, it was handled by the
24 employee-relations groups. So there was a very
25 formal and written procedure, yes.

1 A To my knowledge of what a motor inspector did,
2 mainly they were assigned to the specific
3 location. If you said he was assigned
4 maintenance to a certain mill, a structural mill,
5 wide flange mill, wherever it may be, they
6 basically stayed at that facility and were
7 responsible for any maintenance of that -- the
8 machinery there. Mostly roll line electrical
9 motors, things of that nature.

10 They would -- if there was damage to one
11 they would replace it and take it out of service
12 and put another one in service. They would do
13 preventative maintenance on those motors, that
14 sort of thing, light electrical-type work in
15 either the control booths or whatever. If it
16 went beyond that, then they would call for some
17 outside help to the crafts back at the central
18 maintenance office.

19 Q (By Mr. Erwin) And how did you come to have that
20 understanding about what an electrician motor
21 inspector was doing at the plant?

22 A Just through my nine and a half years of working
23 there observing the jobs themselves, and I was
24 part of the labor relations group afterwards, so
25 I have that knowledge after the time of what the

1 operational on its own.

2 Q And was it a self-contained building?

3 A I guess I don't understand what you mean by
4 "self-contained." It was a stand-alone building
5 but, again, it could have been connected to other
6 things, but it was -- there was walls around it,
7 if that's -- if that's your question.

8 Q Okay. It had four walls and a --

9 A Yes.

10 Q -- roof on top?

11 A Yes.

12 Q Okay. And did you have an opportunity to follow
13 up on those concerns about asbestos in the wide
14 flange mill baghouse?

15 A By following up, I sat down with the management
16 that was involved in maintaining of those, which
17 was the electrical maintenance group, and we
18 suggest -- or suggestion was made that we do
19 sampling while they do the job. We also sat down
20 with the management and had them understand that
21 we needed to have some protective clothing and
22 other precautions for them while they were doing
23 this operation, so we set them up with
24 respirators, both dust respirators which were --
25 they could just wear underneath the mask and also

1 an air-supplied hood, besides disposable clothing
2 that could then be thrown away with the asbestos
3 after the process was finished.

4 Q Okay. So do I understand that when this matter
5 came to your attention --

6 MR. WATERS: I'm sorry. Just --
7 could you give it a time frame? I think
8 that would --

9 MR. ERWIN: Okay. Let me start over.

10 Q (By Mr. Erwin) When, if you can recall, did the
11 baghouse situation come to your attention?

12 A You mean what year or --

13 Q Right.

14 A I don't remember.

15 Q Okay. Well --

16 A It was during the -- between '74 and '78.

17 Q Fair enough. And when it first came to your
18 attention, did you have an understanding that
19 those who were working in the area of the
20 baghouse were aware that the baghouse contained
21 asbestos materials?

22 MR. WATERS: Objection. Leading.

23 A I believe so. We had -- we had discussions with
24 the employees as well as with the management
25 about the situation. There was a concern by the

1 employees. They were, again, reluctant. Again,
2 they did not understand what asbestos was and
3 there was some reluctance to work with it. So,
4 again, my recollection is we had some discussions
5 with them and explained to them and that was why
6 we went through all of the means of explaining to
7 them about the protective equipment and the
8 disposable suits and this sort of thing and then
9 why I'd be sampling them alongside and then,
10 again, give them a copy of the results of the
11 sampling when it was all over with.

12 Q So were you aware of any changeouts of that
13 baghouse filter medium being done without the
14 protective measures that you've described being
15 taken?

16 MR. WATERS: Objection. Vague as to
17 time, time frame.

18 A I can't -- I can't recall it happening before the
19 material was there; so, yeah, not while I was
20 there.

21 Q (By Mr. Erwin) Okay. So while you were there if
22 the baghouse's material was changed out, do I
23 understand that the employees were given
24 respiratory equipment and protective clothing?

25 MR. WATERS: Objection. Speculation,

1 other than the one time he's told you he
2 recalls.

3 A It's the one time. That's the one time that I
4 recall.

5 MR. WATERS: Okay.

6 Q (By Mr. Erwin) Okay. And you only recall one
7 time that it was changed out; is that right?

8 A That's the only time I remember, yes.

9 Q Were you -- strike that.

10 I had asked you earlier about complaints
11 about asbestos exposures at the Houston Works.
12 Are you aware of any other exposures, other than
13 the baghouses, to asbestos products that
14 employees at the Houston Works were experiencing
15 while you were there as industrial hygienist?

16 A The only other ones that I can think of that we
17 were aware of -- at least that I was aware of,
18 and I'll limit it to myself during that period of
19 time -- we used asbestos gloves and materials
20 such as that in some of the operations where
21 there were very hot materials. It was a steel
22 mill where we had melting facilities. And at the
23 time asbestos gloves and some materials such as
24 that were used, that was the best technology that
25 we had at the time. We were looking for

1 alternatives to that even as I was still in that
2 department between '74 and '78.

3 I know there were some areas where there
4 was asbestos insulation around certain piping.
5 My recollection of that is very vague. I know
6 there could have been some maintenance jobs
7 involved in that that I can't remember any
8 complaints. It could have been, but I was aware
9 that there were some asbestos. The plant was
10 built in the '40's and very possibly it was used
11 during that time while it was being built. I
12 can't think of any --

13 MR. WATERS: Go ahead. Finish your
14 answer. I'm sorry.

15 A I'm just saying I can't remember anything else
16 specifically. It's been 20 years, but the
17 baghouse was the big one. That was the one that
18 was the most concern that I was aware of and that
19 I got involved in and, again, other ones of a lot
20 lesser exposure, again, were the -- like asbestos
21 gloves and those sort of things that were used to
22 handle hot -- hot materials.

23 MR. WATERS: Let me just object to
24 the nonresponsive portion about the
25 substitution issues.

1 Q (By Mr. Erwin) When you first started at the
2 Houston Works in 1974, Mr. Schmidt, were
3 substitution or efforts underway to substitute
4 asbestos products out from use and use
5 nonasbestos-containing products?

6 MR. WATERS: Objection. Lack of
7 foundation. Calls for speculation on the
8 part of this witness.

9 A While I was there and during that
10 three-and-a-half-year period, I know there was
11 already efforts that had been made toward
12 identifying where asbestos was in the plant.
13 And, yes, there were efforts to try to eliminate
14 that, you know, while I was there. The biggest
15 example I can think of was, again, the gloves.
16 That was something that was -- you know, it was
17 existing technology at the time to use asbestos.
18 Things were hot. You were in a steel plant and
19 you had to have something to protect the employee
20 from the heat when they were -- when they were
21 exposed to it.

22 We went to different materials and we
23 experimented with some different materials with
24 vendors to get away from it and eventually did.
25 Again, other identification was, again, with the --

1 that I can recall was with the piping, that sort
2 of thing; but there were efforts to try to
3 identify where asbestos was in the plant.

4 MR. WATERS: Let me object to the
5 nonresponsive portion.

6 Q (By Mr. Erwin) With regards to
7 asbestos-containing insulation for piping,
8 Mr. Schmidt, do you recall it -- well, let me
9 rephrase. Strike that.
10 You've mentioned having an awareness or
11 seen that there may have been some
12 asbestos-containing insulation or piping at the
13 plant. Was that situation, that is, the
14 identification of asbestos insulation on piping --
15 and I understand you're talking in some
16 generalities and harking back a few years -- but
17 when you started there in 1974 and as you came on
18 to work and were finding out about the plant,
19 were you -- did you learn then that asbestos
20 insulation had already been identified in areas
21 of the plant?

22 A Yes --

23 MR. WATERS: Objection. Calls for
24 hearsay.

25 A Yes, I did learn that it had been identified when

1 I was there.

2 Q (By Mr. Erwin) Okay. Now, was part of your job
3 as an industrial hygienist to conduct
4 walk-throughs through the plant?

5 A Yes.

6 Q And explain for the jury what a walk-through
7 would be.

8 A Well, if we were looking to see what-- identify
9 what the hazards were in an area and, again, to --
10 maybe to explain what my role was, I was learning
11 the craft, if you want to call it that, of being
12 an industrial hygienist, so I spent time going
13 through virtually every department, at least a
14 day to begin with and then after that went back
15 and did some walk-through surveys of different
16 areas, sometimes at the request of a supervisor,
17 sometimes it was the request of an employee,
18 sometimes it was on my own as an investigative
19 part to learn more about the area. And I would
20 walk through, use material safety data sheets
21 that I had acquired for the materials used in
22 that area and, again, talking with either
23 supervisors or the employees in the area to see
24 what the exposures might be.

25 Obviously some of them come to the

1 forefront right away -- if you walk through an
2 area and then it was quite noisy. I mean, that
3 would be an easy way to identify that there was
4 noise in the area. If you walked through the
5 area and you could visually see some dust or
6 fume, then obviously you knew that there might be
7 some exposure on that front somewhere. Some of
8 them may not be quite so apparent and would
9 require a little bit of discussion with people to
10 determine whether or not there was a hazard one
11 way or the othe .

12 But that is basically the way I -- I do
13 that and it was, I would say, probably
14 concentrated mostly towards the blast furnace
15 area because of some standards that were very
16 active during that time, mainly being the Coke
17 oven emission standards and we had a Coke oven.
18 So there was a lot of my time spent probably in
19 the blast furnace area versus some of the other
20 parts of the plant.

21 Q You've mentioned material safety data sheets.
22 Just so the jury will understand, what were
23 those?

24 A A material safety data sheet is a form that is
25 required by a manufacturer of a chemical to pass

1 out along to whoever they sell that chemical to
2 to give a basic description of what the chemical
3 is and what are its physical functions and, also,
4 how it reacts in certain situations and how does
5 it affect an individual employee who might use
6 that. It also has first-aid procedures on it and
7 also cleanup procedures if there's a spill of
8 some sort, whether it be a liquid or a powder or
9 whatever the form that the chemical comes in. So
10 it's just a general description from the
11 manufacturer to the person using the chemical to
12 help them to use it safely.

13 Q Now, were those material safety data sheets
14 available for the products that were used at the
15 ARMO Houston Works during the period you were
16 there?

17 A Some. It was not a perfect practice at that
18 time. It was, as I think I mentioned earlier,
19 OSHA was just starting off in -- with their
20 formulation of their regulations and also the
21 industry was catching up to those regulations.
22 Some manufacturers of chemicals and products did
23 not have material safety data sheets for their
24 products and there had to be discussion with them
25 about providing those and that was one of my

1 check to see that, plus obviously check to see
2 those that were there for a long duration of
3 time.

4 Q So you had some equipment that allowed you to
5 make these samplings of the air?

6 A Yes. There were -- there were some in place when
7 I first started with the job and then I purchased
8 more equipment as I was there.

9 Q Okay. When you foresaw the need to purchase the
10 new equipment and asked for -- requisitioned it,
11 was that ever denied?

12 A No. I was able to add a number of different
13 personal sampling pumps. I added some more noise
14 dosimeters. I got the equipment for calibration
15 of all of these pieces of equipment. I went to
16 training for how to use those -- those things,
17 both, again, outside of the company and within
18 the company. We had our own lab up in
19 Middletown, Ohio.

20 Q And after you took the sample and you had -- or
21 what was it contained in, some sort of a dish or
22 cup or --

23 A Well, if it was a dust sample, we received
24 preweighed -- what's called cassettes in hard
25 plastic with paper in between them and usually it

1 would be hooked up to the personal sampler. Air
2 would be drawn through that paper and then you
3 could -- after the sample was completed, you
4 could cap off the ends of that cassette so that
5 no more air could pass through. The lab in
6 Middletown had preweighed those and identified
7 them on the cassette. They were marked in ink,
8 identified for the Houston plant and a number and
9 then I would correspond that sampling cassette
10 with whoever I was sampling with the amount of
11 time that they were sampled, the sampling pump
12 number and any calibration of that pump to
13 indicate the flow through that -- that pump at
14 that time, send it back to the lab and they would
15 weigh it and make the calculations for the
16 exposure.

17 Q And then would there be any paperwork that was
18 generated out of this endeavor?

19 A The lab had developed a form that they passed on
20 to us for us to fill out and I was required to
21 fill that form out and send it in so that the
22 base information required for the lab was there,
23 and then it also had a description of what the
24 process was that I was sampling.

25 Q And then would you get any sort of written report

1 back?

2 A Yes.

3 Q Okay. And in the area of dust, what were you
4 looking for? Was there some threshold or whatnot
5 that was of concern?

6 A There were some standards that -- that I learned
7 about through my training that were TLV's,
8 threshold limit values, that were established by
9 the American -- I think it's American Counsel of
10 Government Industrial Hygienists. They had their
11 own sampling -- I guess it was a book of TLVs
12 pretty much accepted by OSHA and by industries as
13 a good guideline for what the levels -- safe
14 levels were. So we used those in determining
15 whether or not there was some action to be taken
16 if it -- if the sampling exceeded those values.

17 Q Okay. Now, would your report up to the -- that
18 you filed or that you generated describing what
19 you did and the samples you took, that didn't
20 establish what the TLV was, did it?

21 A No. No. This was a -- this is a separate
22 standard that, again, set by the American Counsel
23 of Government Industrial Hygienists.

24 Q Okay. So then if a report came back, I guess,
25 from the lab, it would come back telling you

1 the exposures are.

2 Q And you mentioned personal protective equipment.
3 When you started working in 1974, were there
4 areas of the plant where respirators were
5 available already at that time for employee use?

6 A Oh, yes.

7 Q Okay. What other means of protecting employees
8 from dust exposure were in place when you started
9 back in '74, if you recall?

10 MR. WATERS: Are you speaking of dust
11 generally?

12 MR. ERWIN: Dust generally, yes, sir.

13 MR. WATERS: I'm sorry.

14 A Mainly respirators was the way it would have been
15 handled. I guess I can't think of another way
16 other than if there would have been a change in
17 process prior to my time, I wouldn't be aware of
18 it.

19 Q (By Mr. Erwin) And what I'm asking is: Were
20 there any other devices such as dust masks, were
21 fans used for ventilation, any of that sort of
22 thing?

23 MR. WATERS: Objection. Leading.

24 A Yes, I'm sure there were. I mean, again, I can't
25 think of any that happened prior to my time

1 because I obviously wasn't there, but those would
2 be other ways that it could be limited.

3 Q Well, when you started in 1974, sir, were the
4 dust masks available for employees to use?

5 A Yes.

6 Q In 1974 were fans a means used for ventilating
7 dusty areas at the plant?

8 A Yes.

9 Q Okay. Now, you talked about your memory of the
10 baghouse situation and asbestos concerns there.
11 Do y recall any protective measures taken for
12 folks working with asbestos -- any other product,
13 but particularly insulation products?

14 A The only thing I could say would be just a very
15 general response. I couldn't -- I can't be
16 specific -- would be that respirators would be
17 available for them.

18 Q Okay. Now, thinking about the monitoring of
19 employees for workplace hazards and particularly
20 dust or dust-generating activities, once you got
21 the reports back from the lab and knew what the
22 substance was and what the situation was, were
23 those reports kept in a certain place?

24 A The industrial hygiene reports, yes.

25 Q And that's what these reports that you and I have

1 been talking about are called, the industrial
2 hygiene reports?

3 A I guess. Again, I don't remember if there was a
4 formal title to them, but that's what I refer to
5 them as, sure.

6 Q Okay. And this would contain the lab analysis
7 plus the record of what your sampling was; is
8 that right?

9 A Yeah. There would be a file on that particular --
10 if you want to call it event. If I did sampling,
11 if you used the baghouse one in particular, any
12 data that I had on that, possibly any calibration
13 of equipment would all be -- would all be kept
14 for that.

15 Q Okay. And as you think back to being there in
16 the industrial hygiene area at the Houston Works
17 in 1974 and when you started doing some of this
18 sampling and monitoring and had reports generated
19 and in putting those reports away, did you become
20 aware that there were -- whether or not there
21 were any previous reports of monitorings for dust
22 that had taken place at the Houston Works?

23 MR. WATERS: Objection. Calls for
24 speculation.

25 A I recall seeing at least one other occasion where

1 all the sampling or monitoring that had been done
2 prior to the time you started work there. That
3 wasn't part of your endeavor, was it?

4 MR. WATERS: Objection. Assumes
5 facts not in evidence.

6 A I may have looked back at it. I consider myself
7 a pretty curious person when I'm looking at an
8 area and I would say I probably looked back and
9 looked at at just about everything that was
10 available. I can only recall that I know I
11 looked at least one set of sampling, but there --
12 there could have been more. I can't say.

13 Q (By Mr. Erwin) Okay. Can you recall any
14 particular -- strike that.

15 While you were out there, did you have any
16 contact with OSHA investigators or
17 representatives concerning their observations
18 about -- of the plant?

19 A Yes.

20 Q And in what regard? How would your contact be
21 with them?

22 A Well, whenever OSHA came out, members of the
23 safety industrial hygiene group usually
24 accompanied them throughout the plant wherever
25 they were going. In cases I can recall were

1 wanted to go through a door into a certain area
2 or walk over to a certain site of the building or
3 wherever they wanted to go, we went with them and
4 allowed them access to it. If they wanted to
5 talk to an employee by themselves or in front of
6 us, it didn't make a difference. We let them do
7 that.

8 Q Okay. Now, did you have occasion to spend any
9 time at the blast furnace area?

10 A Yes.

11 Q And can you describe, just roughly speaking, what
12 that building looked like?

13 A Well, it was more than one building.

14 Q Okay.

15 A The blast furnace area was really comprised of a
16 Coke oven plant, which was a stand-alone
17 facility, a mold foundry, the blast furnace
18 itself, which is a 20-story tall vessel in an
19 accompanying building, and the direct-reduction
20 plant and the centering plant. So there was --
21 what is that -- five separate facilities. All of
22 them we called it kind of in the lower end of the
23 plant because it actually did drop off. The land
24 actually dropped off and you were at the lower
25 end of the plant right next to the Ship Channel.

1 Q Okay.

2 A So that was considered the blast furnace area.

3 Q But the blast furnace itself was this 20-story --
4 excuse me -- how big was the building?

5 A 20-story vessel.

6 Q Okay. And was it -- did it have four walls,
7 floor to ceiling?

8 A The vessel itself was contained within a sort of
9 a building, if you want to call it that. It's --
10 there was sheet metal around it and to protect
11 the employees who were inside from the outside
12 weather, if you want to call it that. But there
13 was then -- the sides of the buildings were, I
14 want to say, ten feet off the ground to allow
15 ventilation all the way around the building. It
16 was not air-conditioned.

17 Q Right. Was the roof vented?

18 A Yes.

19 Q Now, was the floor dirt or concrete?

20 A You're talking specifically of the blast furnace
21 itself?

22 Q Yes, sir.

23 A Actually it was sand.

24 Q Sand, okay. What about the roads around and
25 areas outside the blast furnace itself, were

1 those paved roads or were those dirt or what?

2 A Both. There were paved roads and there were slag
3 roads. It was dirt roads, a little bit of
4 everything.

5 Q Okay. The wide flange mill, now, do I understand
6 that it was -- when was it built, to your
7 knowledge?

8 A I came in '74 and it was already in operation.
9 So my understanding, it was completed '71, '72,
10 somewhere around in there. Again, that's just my
11 recollection of it. It was early '70's. It
12 could have been even '70, but just a few years
13 before I got there.

14 Q So it was a fairly new facility?

15 A It was the newest facility on the site.

16 Q Okay. And was that a self-contained -- in other
17 words, four walls and a roof over it -- building?

18 A I don't want to simplify it as four walls because
19 it was quite a large building. It was separated
20 by the train lines there from the rest of the
21 plant in a sense, but it was its own
22 self-contained set of buildings, yes.

23 Q Okay. Was the wide flange mill an open-air type
24 situation like the blast furnace?

25 A Almost all the buildings in the plant were

1 basically the same design in that sense, is that
2 they had sheet -- sheet metal walls around them
3 and a roof which was vented and the walls around
4 were -- again, I'm just approximating -- about
5 ten feet off the ground, eight to ten feet off
6 the ground so that people or equipment could
7 drive into the building, but, again, also to
8 protect it from any kind of weather on the
9 outside.

10 Q Okay. There's been some testimony, I believe, in
11 this case or the case that the wide flange mill
12 was a dusty facility where there was kind of a
13 cloud of dust hanging in the air. Does that meet
14 with your recollection of what it was like in
15 1974 to 1978?

16 A I don't -- I wouldn't consider it a dusty area,
17 certainly compared to the other areas, no.

18 MR. ERWIN: Okay. I tell you what,
19 we've been going about an hour. I'd like
20 to go over my notes --

21 THE WITNESS: Sure.

22 MR. ERWIN: -- and maybe everybody
23 take a little break.

24 THE VIDEOGRAPHER: Going off the
25 record at 10:32 a.m.

1 you recall any particular area of the plant
2 having more complaints than another pertaining to
3 dustiness?

4 A I can't think of any -- any specific area that
5 there were more complaints on. I would say the
6 Coke oven would be the only one that would come
7 to mind in terms of amount of, again, exposure
8 and one we spent probably the most time on. I
9 really can't recall a majority of the complaints
10 coming from any one area, no.

11 Q Okay. If someone were to characterize ARCO's --
12 well, let me back up.

13 How would you characterize ARMCO's
14 attention to employee safety and health during
15 the time you worked for the company, Mr. Schmidt?

16 A Well, I considered ARMCO to have a very good
17 safety program. Again, accident prevention
18 fundamentals was a very good organized program
19 for prevention of accidents as well as follow up
20 and, you know, -- looking at what happened after the
21 fact, but, again, the main point of it was
22 accident prevention. So they looked at trying to
23 prevent accidents before they happened.

24 A steel mill, as any steel mill, is a heavy
25 industry like that is a -- has a great potential

1 believe, mentioned in respect to the APF. Are
2 you familiar with that?

3 A Yes. Job safety analysis is just a tool for
4 looking at an individual job in trying to
5 identify it from the standpoint of safety. As a
6 job description would help you and classify the
7 job for how much it's worth in terms of pay or
8 effort or something of that nature, a JSA looks
9 at it for what potential hazards exist in that
10 particular job.

11 Q And is this a document, something that was
12 written up?

13 A Yes.

14 Q Okay. And you observed those types of -- you
15 observed JSA's for various -- strike that.

16 Did you observe JSA's at the facility?

17 A Oh, yes. In fact, I was involved -- I know I was
18 involved in helping to develop some JSA's myself.

19 Q And going back to instances where you may have
20 been called in to analyze a dust hazard, would it
21 have been part of your practice to then see what
22 the JSA said for the particular craft at issue
23 and make sure that if a hazard was identified
24 that it was part of the JSA?

25 A If there was a JSA for the job -- and I don't

1 Q Okay. And so in '89 did you become a Cooper
2 employee?

3 A Yes.

4 Q And for how long were you a Cooper employee?

5 A Until March of -- excuse me -- January of this
6 year.

7 Q All right. So from '74 till the present with
8 different employers you have been employed by
9 companies that are involved with heavy industry
10 generally, manufacturing?

11 A Yes.

12 Q I was curious, before you came to ARMCO, sir, did
13 you have any level of training with respect to
14 industrial hygiene or industrial safety?

15 A A very, very vague amount. I was -- my degree is
16 in industrial engineering and one aspect of
17 industrial engineering talks about safety. It's
18 just one part of one course.

19 Q You didn't receive any formal education in
20 industrial hygiene at school or part of a
21 master's program or anything like that?

22 A No. I took some masters courses just to help me
23 with some of the terminology in industrial
24 hygiene, but not towards a degree, no.

25 Q When you hired on with ARMCO, were you

1 specifically hired to be an industrial hygiene
2 engineer?

3 A Yes.

4 Q Okay. And you were hired by Mr. Hueber?

5 A Yes.

6 Q Would you agree with me that as far as -- well,
7 strike that. We'll come back to that.

8 After you left or after 1978, am I correct
9 that you did not have any further experience in
10 industrial hygiene, you were involved more
11 generally with personnel matters?

12 A I was in labor relations, that's correct.

13 Q Okay. But in the time frame '74 to '78, you
14 received instruction and training and your
15 day-to-day job activities were related to
16 industrial hygiene and industrial safety?

17 A Yes.

18 Q I take it then that before you arrived at the
19 plant in -- was it -- when was it, late '74?

20 A August 1st, yes.

21 Q August, '74, when you arrived at that time, you
22 did not -- had not yet received training in how
23 to do monitoring, for example, air monitoring?

24 A No, no. I had no training prior to August 1st.

25 Q You received that training on the job?

1 A Yes.

2 Q Okay. And understanding that you arrived in late
3 '74, would it have been a year or so or how long
4 a period of time would it have been before you
5 actually received that training?

6 A Okay. That's 20-something years ago. The
7 correspondence course was probably the first one
8 that I actively got involved in. American
9 General. I finally thought of the insurance. I
10 think it's American General --

11 Q Okay.

12 A -- had a correspondence course in industrial
13 hygiene. Again, it was kind of a notebook form,
14 self-paced type study. I went to a NIOSH 550
15 course. It was here in Houston -- I don't
16 remember. It was within the first year, but I
17 couldn't -- I couldn't remember exactly when.

18 Q Okay. Let me ask you first, the correspondence
19 course, would that have been in '75 perhaps?

20 A No. That would have probably been in '74.

21 Q Okay. Was that the first thing that you got
22 involved with to get additional training?

23 A Yes.

24 Q Okay. Assuming that the correspondence course
25 was the first thing you did and that was in 1974,

1 would the NIOSH program have been in '75? You
2 can't -- can't tell for sure?

3 A I would say it probably was in early '75.

4 Q All right. And that was -- okay, NIOSH. Now, in
5 the NIOSH 550 course did you receive training in
6 how to do air monitoring?

7 A We discussed it and there were some protocols, I
8 believe, that were given to us at that time. I
9 didn't do any actual sampling in the training.
10 They --

11 Q Did they have -- I apologize, but did they have a
12 how-to hands-on, this is the machine -- this is
13 the equipment and this is how we use it, or was
14 it more theoretical in early '75?

15 A A little bit of both; but, again, it was -- it
16 was not hands on to where I got my hands on it.
17 It was done by an instructor and then the
18 protocols were given to us. So in that sense
19 there was the theory, but my training for
20 sampling was pretty much internal within ARMCO.

21 Q Okay. Well, let's talk about that. Who was it
22 who trained you to do sampling at ARMCO?

23 A I guess several. Bruce Rogers was one because he
24 had done some sampling prior. I believe I had
25 some conversations with Bill Chaddick who was --

1 had preceded me in that responsibility and was
2 still in the environmental group. Wayne Simpson.

3 Q Right.

4 A And we also had some -- we had an industrial
5 hygiene conference in Kansas City. It would have
6 been spring of '75, I believe, and it was a week
7 long. So there I was exposed to all of the other
8 industrial hygienists throughout ARMCO.

9 Q So to speak? Never mind.

10 MR. ERWIN: Objection, side-bar.

11 Q (By Mr. Waters) All right. At the spring
12 conference in the spring of 1975 in Kansas City,
13 would you have received hands-on instruction or
14 further instruction with respect to actually
15 performing sampling or air monitoring?

16 A I don't recall. It was --

17 Q I guess here's what I'm trying to figure out:
18 When was it when you did your first hands-on air
19 sampling at ARMCO?

20 A I believe I did some in '74.

21 Q Okay. And what would that have been, for what
22 type of substances?

23 A Again, by my recollection, my thinking is the
24 first one was in the pipe mill for dust sampling.

25 Q All right. Now, you mentioned in earlier

1 testimony that you recalled as part of the
2 process of doing your first sampling, you looked
3 to see if there were some previous forms, I guess
4 to make sure you were filling everything out
5 correctly; is that right?

6 A Yes. There was -- again, the only previous one
7 that I can think of, I believe it was Bruce that
8 had done the sampling and I looked at what
9 paperwork he had done. He showed me the monitors
10 themselves and then, again, I followed his
11 procedures on how he did that. I kind of
12 combined, also, some of the things that I had
13 learned in my industrial engineering classes in
14 terms of how to take a -- well, one of the things
15 you did was time studies and work sampling. And
16 so I used those same type of principles and
17 applied it to industrial hygiene and it worked
18 quite well.

19 Q Okay. All right. So the pipe mill sampling, you
20 believe it was late '74 or early '75?

21 A I think it was '74. Again, I -- without seeing a
22 document in front of me or something, I wouldn't
23 know.

24 Q Not to worry. As far as your training, however,
25 in early '75, you had the NIOSH course and you

1 had in the spring of '75 the week-long seminar or
2 whatever in Kansas City. If you did, in fact, do
3 any sampling in 1974 for dust, do you feel that
4 you were fully qualified to do that at that time?

5 A I think I followed all the procedures. In saying
6 fully qualified, I was a novice at it, yes.

7 Q That's fair. And in doing that work -- well, I
8 take it from your testimony that that sampling
9 you do not recall being specifically to determine
10 the presence or the significance of asbestos in
11 the air?

12 A No. No. It was dust from a grinding operation.

13 Q Okay. So it would not have been asbestos, in
14 fact?

15 A Oh, no, no.

16 Q Okay. And when you discussed the single -- the
17 one earlier sample results that you found in the
18 records when you went to look, I took it from
19 your earlier testimony that you do not recall
20 that that was related to asbestos --

21 MR. ERWIN: Object --

22 Q -- specifically?

23 MR. ERWIN: I'm sorry. Objection to
24 the extent the question mischaracterizes
25 his testimony. I do not believe his

1 testimony has been that's the only one he
2 found. That's the only one he recalls
3 seeing, so I object on those grounds.

4 MR. WATERS: Fair enough. Anyway,
5 you can answer the question.

6 A I don't recall it. I guess the question was:
7 Was the sample that I looked at asbestos --
8 sampling for asbestos in the air? As far as I
9 know, no, but I don't remember.

10 Q (By Mr. Waters) When was the first time you have
11 a specific recollection of doing air monitoring
12 to determine whether there was asbestos in the
13 air and how much, if ever?

14 A It was -- it was the baghouse.

15 Q Okay. The baghouse job?

16 A Right.

17 Q And you did seem to be focused on that. That's
18 something you remember pretty distinctly, I take
19 it?

20 A Oh, yes. Yes.

21 Q Did you have an opportunity when you were meeting
22 with the attorney for ARMCO to look at any of the
23 documents in this case?

24 A Yes.

25 Q Did you actually look at the baghouse documents?

1 A Yes.

2 Q Okay. And the records will reflect what that
3 was. We'll look at those in a little bit. Okay.

4 Would you, in fact, have become certified
5 had you continued in the field? Was that your
6 intention and were you in the process of doing
7 that?

8 A I was in the process of doing it; and, yes, it
9 was my intention.

10 Q You indicated that when you joined the safety
11 department there were four other people including
12 Mr. Hueber, the supervisor?

13 A Three other.

14 Q Oh, three and yourself.

15 A I was the fourth.

16 Q Okay. There were a total of four people?

17 A Right.

18 Q All right.

19 A One of those changed while I was there, but, I
20 mean, when I first got there there was three
21 others besides myself.

22 Q When you first got there in '74, were you the
23 only person who had any qualification to do air
24 monitoring of the four people?

25 MR. ERWIN: Objection. Vague. I

1 think it --

2 MR. GONZALEZ: Objection. Calls for
3 speculation.

4 MR. ERWIN: -- calls for speculation.

5 A Okay. Well, I wasn't qualified at that time. If
6 you go back to August 1st, I was just starting
7 myself.

8 Q (By Mr. Waters) Was there anybody else -- well,
9 was there anybody among the four people in the
10 safety department in the latter part of 1974
11 qualified, trained to do air monitoring work?

12 A Again, I don't know. I don't know what kind of
13 training they had prior to that time.

14 Q In terms of your responsibilities, you reported
15 to Mr. Hueber?

16 A Yes.

17 Q Okay. Would you agree with me that Mr. Hueber
18 would have more knowledge than you concerning
19 overall safety issues and the safety issues that
20 pertained to the entire plant?

21 A Oh, yes.

22 Q The safety building that you described, did that
23 have any asbestos in it?

24 A I'm not aware of any.

25 Q Okay. Best of your recollection, you don't

1 recall ever hearing or seeing or understanding
2 that there was any asbestos in the building in
3 which you spent a fair amount of your time?

4 A Not that I recall, no.

5 Q Okay. And let's talk about that briefly. Can
6 you give me a sense in that three-and-a-half year
7 period about how much time you spent in the
8 office in the safety building relative to doing
9 other work? Just on -- let's take an average day
10 filling out reports, doing whatever -- I don't
11 know exactly what you were doing, but --

12 A 50/50 maybe.

13 Q About 50 percent of the time in the office and 50
14 percent around the plant?

15 A Yes.

16 Q Okay. And tell me, the 50 percent where you're
17 not in the office, give me the rundown on the
18 different things you might be spending your time
19 doing.

20 A I guess maybe the first year I was there, a lot
21 of it was just learning the plant. It's quite a
22 large plant.

23 Q Right.

24 A If you've not been to the plant, it's, I believe,
25 around 750 acres. I could be mistaken on that,

1 but it's quite large, 50-plus departments. So
2 one of the first training things I went through
3 from just an orientation, I guess, rather than
4 training thing was that I spent a day in as many
5 departments as I could. I was introduced to a
6 supervisor, let's say, at the Coke plant and then
7 I spent the day with the supervisor in the Coke
8 plant to familiarize myself with that facility
9 and then the next day the centering plant and the
10 next day the blast furnace. And when you go
11 through about 50 departments, that takes a while
12 just to -- just to do that. So I guess maybe the
13 first few months it was even more than the 50/50.
14 That was kind of an average over the three and a
15 half years.

16 Q Okay.

17 A But a lot of it was learning, too, just getting,
18 you know, accustomed to the plant itself.

19 Q All right. You indicated that there were --
20 there was an X-ray technician employed at the
21 plant?

22 A Yes.

23 Q And was it a lady?

24 A Yes.

25 Q Her services could have been used to perform

1 A Well, yes, in the sense of the baghouse. We
2 discussed that with them, the people -- I think
3 it was a crew of about three. Again, I'd have to
4 go back and look at the documents as to how many
5 were involved, but two or three that were
6 involved in a two-day process to do that and we
7 had discussions with them so they'd understand
8 what was going on.

9 Q Okay. All right. Other than the baghouse
10 incident, is it a fair statement that you do not
11 recall ever discussing asbestos or being involved
12 with safety meetings about asbestos that involved
13 the workers, the hourly workers?

14 A Again, unless it was a casual conversation.

15 Q All right. But understanding --

16 A No. There was no formal, no. I didn't call the
17 meeting, if that's what you're asking. No, I did
18 not call the meeting with hourly employees to
19 discuss asbestos other than the baghouse
20 situation.

21 Q And you don't recall, as you sit here today, any
22 informal discussions, I take it, with workers on
23 that issue particularly?

24 A None that I recall, no.

25 Q The annual meetings that took place at the

1 corporate headquarters in Middletown, Ohio, do
2 you have a specific recollection one way or the
3 other of whether asbestos was discussed as a
4 safety hazard at those meetings? And if you
5 don't then --

6 A No, I really don't recall.

7 Q Fair enough. Similarly, you indicated that from
8 time to time memorandum, memoranda, memos, were
9 received from the corporate headquarters in
10 Middletown on safety and on industrial hygiene
11 issues. Do you recall that testimony?

12 A Yes.

13 Q Is it a fair statement, sir, that you do not
14 recall any of those memos specifically focusing
15 on the hazards of asbestos in your time frame,
16 '74 to '78?

17 A Yeah. I can't -- I can't recall anything
18 specifically.

19 Q You indicated that there were handouts from time
20 to time that were provided to workers at the
21 plant. Do you remember that, some related to
22 family safety and summertime safety, that sort of
23 thing?

24 A Yes.

25 Q Okay. And I take it that these were written

1 Q Okay.

2 A But it was a -- it was not a major time consumer
3 of my time, no.

4 Q It was not an area -- asbestos was not an area of
5 focus on your part. Is that a fair statement?
6 It's not a priority area in that respect?

7 A It was not a priority area because, again, we
8 considered that there was just a limited number
9 of sources that we had.

10 MR. WATERS: Okay. Let me object to
11 the nonresponsive portion. From time to time
12 time I have to do that, but it's --

13 THE WITNESS: Sure. That's fine.

14 Q (By Mr. Waters) With respect to safety equipment,
15 I think you testified that the workers were
16 required to purchase their own safety shoes and
17 their own safety gloves?

18 A Certain safety gloves, just a cotton glove if
19 they wanted to use that, that was -- that's
20 something they had to purchase. If it was a
21 specific nature, it required by the job --
22 leather-type gloves, again, heat-resistant
23 gloves, aluminized-type specialty items -- those
24 were all provided by the company. But just work
25 gloves for your general use to have a shovel --

1 to have a glove for a shovel, that was paid for
2 by the employee.

3 Q So ARMCO didn't require, for example, its workers
4 to purchase the asbestos gloves you described?

5 A Oh, no. No.

6 Q With respect to -- you used the term
7 "respirators" and I want to be very clear about
8 what you mean by that because when you say
9 "respirators," are you using the term to include
10 any and all types of respiratory protection?

11 A Yes.

12 Q Okay. And so when you use the term "respirators"
13 as you have throughout your testimony, you may
14 well be referring to cloth or paper masks that
15 fit over the nose and mouth?

16 A Oh, yes.

17 Q All right. But those, in your mind, are separate
18 and distinct from respirators where -- that have
19 the canisters on them or that are heavier?

20 A There's -- yes. There's just the disposable --
21 it's called disposable respirator. There was a
22 chemical respirator. There were cartridge
23 respirators.

24 Q All right.

25 A There was airline respirators, there was

1 A That's correct.

2 Q All right. And if a supervisor were to take a
3 box of them to a particular job site, they might
4 be available on a particular job site?

5 A Yes.

6 Q Okay. But you're not going to tell -- you're not
7 telling this jury in this case that every
8 operation -- in every operation where there was
9 dust generated, workers had available ten feet
10 away, 20 feet away, masks to protect themselves?

11 MR. GONZALEZ: I'm going to object as
12 argumentative.

13 MR. ERWIN: Join.

14 A Well, again, I can't speak to every portion of
15 the plant. They were available both to the
16 employee and to supervisors; and, again, where
17 there -- where they were all located, I couldn't
18 testify.

19 Q (By Mr. Waters) Okay. You know -- you know the
20 specific places where they were located and you
21 told us that. How far, for example, is the blast
22 furnace area from the safety building?

23 A As the crow flies, probably about a quarter of a
24 mile.

25 Q Okay.

1 discussed? You didn't name him, but you talked
2 about that a little bit.

3 A One of them I remember. There could have been
4 more, but one I remember was a fellow named Bobby
5 Cordor.

6 Q Bobby Cordor?

7 A Cordor.

8 Q Do you recall how to spell his name?

9 A I think it's C-o-r-d-o-r.

10 Q Okay.

11 A It could be d-e-. Again, it's been a long time
12 ago.

13 Q Sure. Now, what you said in your earlier
14 testimony was that -- and I wrote it down -- you
15 were certain that in the time frame you worked
16 there, some grievances were filed that related to
17 industrial hygiene or industrial safety; is that
18 correct?

19 A I don't know that I said I was certain that there
20 were some, but I would think there sure -- there
21 would have been some.

22 Q All right. And what you can't tell us, I
23 suspect, given the passage of time is whether or
24 not any of those grievances related any to
25 asbestos hazards?

1 there was just a lot of them within that one
2 craft area.

3 Q Okay. What have you been told about this case by
4 counsel for ARMCO?

5 A That it's a lawsuit -- I guess there were some
6 people that died of asbestos and there's a
7 lawsuit, a class-action suit, I believe.

8 Q Were you provided an opportunity to review the
9 deposition testimony, the sworn testimony of any
10 of the witnesses, the people that worked out at
11 the plant in the time frame we're talking about?

12 A No.

13 Q Okay. What were you provided, if anything, to
14 look at with respect to this case in your
15 anticipated testimony?

16 A Some of the documents such as the reports like
17 the one for the baghouse where I did the sampling
18 there, my reports that I wrote up, some reports
19 of others that had done some sampling after me --
20 at least there were some from Scott Gunderson --
21 some memos, things of that nature.

22 Q Okay. Did you find any records that indicated
23 asbestos sampling at the ARMCO facility prior to
24 1976 or 1977?

25 A You'll tax my memory there. Again, the only one

1 that I can recall was the baghouse one and I
2 can't remember the date. I think that one was in
3 '76.

4 Q Okay. I think that's right.

5 The baghouse incident, is that something
6 that -- was that an operation where it was
7 necessary to remove asbestos as part of a
8 maintenance procedure?

9 A The baghouse was -- the whole purpose of the
10 baghouse was to clean air. It was an
11 air-conditioning filter, is really what it was.
12 It's no different from the air-conditioning
13 filter you have in your house to take the dust
14 out as it's being circulated through your house.

15 This was air that's going through a
16 switching station, and the main concern of the
17 switching station is you don't want dust in there
18 because dust would then build up on the switches
19 and could cause shorts. So it was an
20 air-conditioned location. So this was the
21 baghouse which was -- air was brought in through
22 the bag filtering material. Dust then, or
23 whatever was from outside ambient air, was
24 cleaned and settled in on the filters and then
25 the air that went through then was clean to go

1 through the -- through the substation.

2 Q So, in effect, this was a method of filtering air
3 at the plant and filtering out dust and other
4 particles?

5 A Yes.

6 Q And in 1976 y'all -- or the electricians, I guess --
7 were involved with essentially cleaning the
8 filter?

9 A Well, the filter being -- if you saw the drawing
10 there, it was a -- the baghouse was literally
11 bags, just like vacuum cleaner bags in a sense.
12 They're round and I'm going to approximate 15
13 feet high and quite a few of them. I don't
14 remember the number of how many bags there were
15 within this baghouse and --

16 Q And that's where the stuff accumulated in the
17 bags?

18 A You -- you loaded the asbestos material in the
19 bags and then the outside air came through the
20 bags, was filtered out in the material and then
21 exited out through the top -- or, yeah, top or
22 the bottom. Again, it's been too long.

23 Q So the asbestos material was actually used for
24 the filtration process?

25 A Yes.

1 Q What was that material? I mean, was it raw
2 asbestos?

3 A I don't recall. It was asbestos material. I
4 don't know if it was --

5 Q Was it --

6 A -- partially or if there was other things in it.

7 Q Was it loose?

8 A Yeah.

9 Q Okay. I'm just trying to kind of visualize it.
10 In any event, I take it that because you've got
11 these bags filling up with material over the
12 course of time, that emptying them or cleaning
13 them was something that was done on a regular --
14 regular or routine basis?

15 A Regular in the fact that eventually they did get
16 dirty enough that they needed to be cleaned. I
17 don't remember what the cycle time was. It
18 wasn't weekly or anything like that. It could
19 have been several years before --

20 Q Okay.

21 A -- before it required cleaning.

22 Q So it's possible, for example, that in 1974 or
23 1975 or 1977 or 1978 that this same operation
24 that you've described would have had to take
25 place?

1 A It's possible, yes.

2 Q Okay. Now, you indicated that other than the
3 baghouse, the only other exposure that you were
4 aware of had to do with asbestos gloves. Do you
5 recall that?

6 A I said and also some insulation, piping
7 insulation.

8 Q Okay. Were you aware in the '74 to '78 time
9 frame that the pipe insulation in the plant was
10 asbestos and had a potential for exposure to the
11 employees?

12 MR. ERWIN: I'm going to object to
13 the extent it mischaracterizes the
14 evidence and the facts. It's assuming
15 that all piping insulation was asbestos
16 and that's not the case.

17 MR. GONZALEZ: I'll join in that
18 objection.

19 MR. WATERS: You can answer.

20 A Well, that's basically it, is I didn't do any
21 sampling of that to indicate that it was. It was
22 my impression that it was, but I had no, again,
23 empirical evidence, or whatever you want to call
24 it, to say that it was or what percentage it was,
25 but it was my understanding that there was some

1 insulation and it was asbestos.

2 Q (By Mr. Waters) And you understood that since the
3 insulation was there, some insulation that
4 contained asbestos, that at a minimum there was a
5 potential there for exposures, correct; that is
6 to say, if the material was broken down or became
7 friable or something of that nature?

8 A Right, if those things occurred, but under normal
9 process it wouldn't.

10 Q Okay. But am I correct in that in the '74 to '78
11 time came anyway, there were no efforts made to
12 monitor or to quantify exposures that might
13 result from working with asbestos pipe covering
14 or other asbestos insulation?

15 MR. GONZALEZ: I'm going to object to
16 the extent it calls for speculation and to
17 the extent it assumes facts not in
18 evidence, that there was any work ongoing
19 involving pipe insulation that contained
20 asbestos in that time period.

21 MR. ERWIN: Join.

22 A Again, if there was something going on, I would
23 have -- and I knew about it. It's possible that
24 something was worked on that I did not know
25 about, but if it was -- if somebody would have

1 come to me, then I would have looked at sampling
2 it, but no one did.

3 Q (By Mr. Waters) If someone had come to you and
4 said, "We've got to remove 20, 40, 50 feet of
5 pipe covering off of this steam pipe in this
6 building and we're concerned it might have
7 asbestos," under those circumstances you would
8 have gone to monitor or made some arrangements of
9 that nature?

10 A I would hope so.

11 Q Okay. But you don't have a recollection -- that
12 never happened, I guess is what I'm saying.

13 A I don't recall it happening, no.

14 Q Okay. You indicated that in the '74 to '78 time
15 frame efforts were made to identify where
16 asbestos had been used in the facility?

17 A Yes.

18 Q Did you all actually start to do core sampling to
19 determine what materials were asbestos and what
20 were not throughout the plant?

21 A I don't think it was that sophisticated at that
22 time.

23 Q Okay.

24 A I think it was more of a --

25 Q General?

1 A -- general, this is where we believe it might
2 exist, and then take it, again, as you do any
3 kind of a problem as they come about, you
4 prioritize. And if something is a problem --
5 example being the baghouse -- I was aware that
6 there was asbestos in there prior to them
7 changing it out. I had some discussions with
8 engineering. I don't remember any of them
9 written, but I remember having some -- some
10 verbal conversations. Then when it became time
11 to take it out, obviously it came to the
12 forefront of something that needed to have
13 attention.

14 So prior to that time there was other --
15 there was plenty of other activities I could get
16 involved with that, you know, superceded the fact
17 that asbestos was in this baghouse, but sitting
18 there totally enclosed and not bothering anyone.
19 So until that time, then, I did not take it as a
20 priority.

21 MR. WATERS: Okay. Let me object to
22 the nonresponsive portion.

23 Q (By Mr. Waters) You indicated that you did
24 some -- well, strike that.

25 Do you have a recollection, sir, of ever

1 observing dust being created from asbestos
2 insulation?

3 A I can't recall, no.

4 Q If in one of these walk-through surveys that you
5 talked about you had observed the tear out of
6 asbestos insulation, rip out from pipes, for
7 example, and you saw that going on and observed
8 that it was creating visible dust, that's
9 something that I assume would have concerned you
10 a great deal?

11 A Again, if I'd have observed it, yeah, I would
12 hope so.

13 Q Okay. And if you had observed conditions of that
14 nature, then presumably you would have stopped
15 the operation, for example?

16 A Again, it depends on the circumstances for what --
17 how it was occurring and where it was occurring.
18 If it was an area that there was not any exposure
19 to anyone else outside or something of that
20 nature, it was not of a, you know, significant
21 amount, then I don't know that we'd have stopped
22 the operation. I probably would have looked at
23 the individual to see what kind of protection
24 they had to see if they were following any kind
25 of procedures that would protect them and then

1 see how far they were going to go with it.

2 Q Okay.

3 A Again, it's kind of an open-ended question. It's
4 hard to determine what I would have done in --
5 you know, under those circumstances --

6 Q Okay.

7 A -- other than that.

8 Q Let me see if I can make it a little more clear.
9 If you have a situation where you observe an
10 individual who's doing that kind of work and he's
11 removing asbestos insulation, it's creating dust,
12 you can see the dust from your perspective on
13 your walk-through survey and the gentleman is not
14 wearing any of type of mask or protection, under
15 those circumstances what do you do as the
16 industrial hygienist?

17 A Well, one of them is I would have talked to him
18 about wearing a respirator under any
19 circumstances, whether -- because, again, I don't
20 know that I was ever trained at any point that I
21 could identify asbestos on-site, you know, my own
22 visual looking at it, that I would have had to
23 have had some kind of a sample to get to a lab or
24 whatever, either an air sample or a sample that I
25 would have taken from the material itself.

1 So, you know, I guess if you err on the
2 side of safety, I would have had to assume it was
3 asbestos and make sure that person was -- you
4 know, had a respirator and also that the material
5 in some way was either captured by some kind of a
6 ventilation system or wetted down, something of
7 that nature, that would keep it from becoming
8 airborne.

9 Q Okay. And those -- those ideas -- wetting down
10 or enclosures or respiratory protection -- those
11 are all -- those are all methods to try to deal
12 with asbestos in a safe a way as possible?

13 A Yes.

14 Q Okay.

15 A Well, another would be elimination of it or
16 substitution, you know, but --

17 MR. WATERS: Okay. Let me object as
18 nonresponsive.

19 Q (By Mr. Waters) I meant to be speaking
20 particularly in terms of this scenario I've just
21 described for you.

22 A Oh, okay. Yeah, sure.

23 Q The equipment that you had by 1976, I take it
24 that that was sufficient for you to use to
25 measure for asbestos in the air like you did at

1 the baghouse?

2 A Oh, yes, I think so.

3 Q Okay. And you indicated that the samples were
4 actually sent all the way up to Ohio to be
5 analyzed by ARMCO's own lab?

6 A That's correct.

7 Q So the samples were not interpreted, for example,
8 by an independent laboratory in the Houston area?

9 A I'm not aware of any, no.

10 Q Okay. The records that we've been provided do
11 not indicate -- at least I don't recall any --
12 records of personal sampling for asbestos. Do
13 you have any recollection as to personal
14 sampling; that is to say, monitor on the
15 individual for asbestos?

16 A I thought some of those were personal samplings.

17 Q From the baghouse?

18 A Yes.

19 Q Okay. Well, I may be -- may have misread them.
20 It wouldn't --

21 A I think I did both personal samples and area
22 samples both.

23 Q Okay. Other than the -- let me put it to you
24 this way: Other than the baghouse incident, is
25 it fair to say that you don't recall doing

1 personal sampling for asbestos anywhere else in
2 the plant?

3 A I don't believe I did, no.

4 Q Okay. The -- it sounded to me -- we didn't
5 really get into this, but in terms of what you
6 were looking at, '74 to '78, at least with
7 respect to asbestos and I guess with other
8 materials, your concern would have been the ACGIH
9 TLV's or threshold limit values?

10 A Yes.

11 Q And that's what y'all were trying to follow in
12 order to have as safe a workplace as possible?

13 A Yes.

14 Q Okay. You'll agree with me that using fans in a
15 dusty area without ventilation to remove the dust
16 can create -- can actually worsen the situation
17 and make it dustier?

18 A Well, under the right circumstances it can make
19 it dustier and other circumstances it can -- it
20 can make it less. So a lot of those kind of
21 situations are commonsense ones. If you have an
22 individual who's got a fan blowing the fumes
23 right at him, then it will obviously make it
24 worse. There was occasions where I actually told
25 the employee either you have to move the piece

1 Q I'm sorry. Let me -- let me try again.

2 A Okay.

3 Q Understanding that you had air-conditioning in
4 the safety department and for some of the other
5 management facilities, with respect to the hourly
6 employees who worked in some of these other
7 areas, am I correct that fans were used to try to
8 create some relief from the heat?

9 A Yes.

10 Q Okay. I take it that you don't recall any
11 local ventilation; that is to say machinery
12 that would remove dust from the source of its
13 creation, being used around asbestos materials in
14 the '74 to '78 time frame?

15 MR. GONZALEZ: I'm going to object to
16 the extent that that's making the
17 assumption that there were indeed any
18 asbestos materials in those areas.

19 A I can't recall any, no.

20 Q (By Mr. Waters) You indicated that you consider
21 yourself to be a curious person and that one of
22 the things you would have done would be to look
23 and see which predecessors had done -- what
24 sampling work had been done before you arrived.
25 Do you recall that?

1 A Yes.

2 Q And what you can recall from that is, in looking
3 to see what had been done previously was one dust
4 sample that some other individual had done that
5 you used as a model when you did your first one.
6 Is that a fair statement?

7 A Yes.

8 Q With respect to OSHA investigations, you would
9 agree with me that employees generally would not
10 be in a position to complain about hazardous
11 conditions unless they understand and have been
12 told or know that the condition actually creates
13 a hazard?

14 A Yes. I think that's a fair statement.

15 Q In other words, if an employee has not been
16 educated that asbestos, for example, is a hazard,
17 then he's not very likely to make a complaint to
18 OSHA or to ARMCO or anyone else, is he?

19 A That's a fair statement.

20 Q The Coke oven plant, is it coal tar pitch
21 volatiles or is it coal pitch tar volatiles? I
22 can never --

23 A You had it right the first time.

24 Q Oh, okay. What is that? I know it's something
25 that OSHA was concerned about and that y'all were

1 there were -- there were fumes that came from the
2 operation of the -- of when the billets were then
3 reduced down through the mills to a -- to a
4 finished wide flange product. So it really
5 wasn't dusty. It was a fume and some -- actually
6 some mist that came off of those. So it really
7 wasn't a dust, if you want to really use the term
8 "dust."

9 Q Okay.

10 A There was practically no dust from the wide
11 flange operation --

12 Q Okay.

13 A -- whereas, in other areas --

14 MR. WATERS: Let me stop you there
15 just to clear up the record. Let me just
16 object as nonresponsive.

17 THE WITNESS: Sure.

18 Q (By Mr. Waters) My specific question is about --
19 again, I think you're about to get into it, but,
20 again, the other areas and where you consider
21 dust to have been an issue at the plant.

22 A The dustiest area was probably the centering
23 plant.

24 Q Centering plant?

25 A Uh-huh.

1 A Most likely.

2 Q Okay. If insulation work was done on boilers,
3 for example, in the context of maintenance or
4 repair, would that, again, have been pipe fitters
5 or would that have been some other craft?

6 A Most likely pipe fitters.

7 Q And from time to time would general maintenance
8 or laborers be involved with assisting with that
9 work or cleaning up from that type of work?

10 A I'm having to speculate on things that I -- I
11 don't know. I don't recall any work like that,
12 but it's very possible that if that took place
13 that general labor would be involved, yes.

14 Q Okay. Okay.

15 THE VIDEOGRAPHER: Sir, excuse me,
16 can we go ahead and change the tape?

17 MR. WATERS: Yeah, let's do that.
18 That's a good idea.

19 THE VIDEOGRAPHER: Going off the
20 record at 11:59 a.m.

21 (At this time a brief recess was
22 taken, and the proceedings thereafter
23 resumed as follows:)

24 THE VIDEOGRAPHER: We're back on the
25 record at 12:13 p.m.

1 Q (By Mr. Waters) You mentioned that one of the
2 people you had some involvement with was Mr.
3 Wayne Simpson?

4 A Yes.

5 Q Would you agree with me, sir, that given his long
6 involvement with industrial hygiene issues
7 generally for ARMCO that he would be in a better
8 position to know and understand what ARMCO knew
9 about the hazards of asbestos at various times?

10 A Than myself?

11 Q Yes, sir.

12 A Yes.

13 Q I want to ask you about a company called Brown &
14 Root. Does that -- are you familiar with that
15 name?

16 A Yes.

17 Q Were you aware in the time frame of '74 to '78
18 that Brown & Root was performing maintenance work
19 on a continuing basis at the facility?

20 A I believe they were, yes.

21 Q Okay. Was Brown & Root required as a contractor
22 to follow ARMCO safety policy?

23 A I -- I don't know what they were instructed.

24 Q Okay. Did you have any involvement with Brown &
25 Root personnel with respect to industrial hygiene

1 or safety?

2 A Some to safety. I had conversations on occasions
3 with their safety coordinators.

4 Q Okay. They had their own safety coordinators at
5 the facility?

6 A Yes.

7 Q And did you essentially assume that the Brown &
8 Root safety coordinators would be responsible for
9 safe conditions in the vicinity of their workers?

10 A Yes.

11 Q What type of work were they doing there, to your
12 general recollection?

13 A I guess if -- one word would be construction.

14 Q Okay. And when you use the word "construction,"
15 does that also include maintenance? In other
16 words, I think of construction as being something
17 brand new. Are you --

18 A Well, we were a unionized plant and there were
19 lines drawn as to where we could and could not
20 use an outside contractor and there was some
21 pretty strict restrictions on -- on maintenance
22 work, but there was some done. Now, I don't
23 recall what it all was.

24 Q There was some maintenance work done by Brown &
25 Root employees?

1 objection.

2 MR. MARKS: Join in that objection.

3 MR. WATERS: You can answer.

4 A I guess I'd have to know a little bit more about
5 what you mean by criticize. You know, I would
6 hope that all companies would do that, if that's
7 an answer to your question.

8 Q (By Mr. Waters) Okay. Well, with respect to the
9 corporate safety department, would -- would you
10 believe that a responsible corporate safety
11 department would do everything within its power
12 to follow its corporate safety policies as well
13 as federal and state regulations?

14 MR. ERWIN: Same objection. Vague,
15 ambiguous, overly broad, calls for
16 speculation, argumentative.

17 MR. GONZALEZ: Join.

18 A Again, I would hope that any company would do
19 that, yes --

20 Q (By Mr. Waters) Okay.

21 A -- follow the regulations and rules.

22 Q Okay. Did you receive some instruction in
23 training concerning the fact that asbestos was,
24 in fact, a hazardous substance in the time frame
25 where you did this work?

1 that would have been the time frame,
2 approximately, when you learned it?

3 A Oh, yeah. Oh, yeah.

4 Q Okay. In any event, as you sit here today,
5 you've become aware of the fact that asbestos
6 exposure can cause asbestosis, mesothelioma, and
7 lung cancer?

8 A That's my understanding, yes.

9 Q Okay. You'll agree with me that asbestos is
10 considered to be a hazardous substance?

11 A Yes.

12 Q It's considered to be toxic and dangerous?

13 A Okay, yes.

14 Q Okay. With respect to asbestos products -- let's
15 just say thermal insulation or other types of
16 asbestos products that in their normal use from
17 time to time emit dust -- would you agree with
18 me, sir, that those products can be dangerous if
19 they are emitting dust?

20 A Again, under the right circumstances, yes.

21 Q From 1974 to 1978, I believe what you've told us
22 is that the precautions you recall being used
23 with respect to asbestos would have been
24 predominantly the use of respiratory protection?

25 A Yes.

1 Q Okay. Any other precautions -- you didn't
2 mention any other ones, but I want to ask if you
3 recall any other precautions being taken with
4 respect to reducing or eliminating asbestos
5 exposure, 1974 to 1978?

6 A Substitution.

7 Q Okay. And by -- any others, first, before I move
8 on?

9 A Well, again, like wetting down of the facility to
10 keep it from becoming airborne.

11 Q Oka Did you ever observe with the wetting
12 process being used to keep levels of asbestos
13 dust down?

14 A Yes.

15 Q In the '74 to '78 time frame?

16 A Yes.

17 Q But you'll agree with me, whenever that occurred
18 you did not do any monitoring to determine the
19 levels of the dust?

20 A Well, actually it was during that time that we
21 were doing the monitoring after --

22 Q The baghouse event?

23 A Yes. During the cleanup process.

24 Q Okay. Other than the baghouse incident, is it a
25 fair statement that you do not specifically

1 recall the wetting method being used to reduce
2 asbestos dust?

3 A I don't recall it, no.

4 Q Is it a fair statement, sir, that you do not
5 recall there being warning signs placed in the
6 vicinity of asbestos thermal insulation to advise
7 workers that this was a dangerous substance or
8 could cause cancer or anything of that nature?

9 MR. GONZALEZ: I'll object. That --

10 A During this --

11 MR. GONZALEZ: -- that assumes facts
12 not in evidence.

13 A During this baghouse time when we were changing
14 it out, we had labeling on the containers and
15 that sort of thing, yes.

16 Q (By Mr. Waters) Okay. When you actually removed
17 the asbestos materials to dispose of them, what
18 you're saying is that you put labels on the bags
19 that this was asbestos material?

20 A Well, it wasn't actually a bag. It was cardboard
21 containers that we used to dispose of the
22 asbestos and they were labeled and with the
23 warning signs on them.

24 Q Okay. And the materials were disposed where, on
25 the site somewhere? Do you have a landfill or

1 something of that nature?

2 A Again, I -- I was turned over to a different
3 group to take care of that, and I don't recall
4 where it went.

5 Q Okay. But the loose asbestos that you've
6 recalled was essentially placed into a cardboard
7 box for removal?

8 A Yes, cardboard barrel.

9 Q Cardboard barrel. But at no time did you ever
10 observe anywhere else in the plant any sign that
11 indicated or an warning caution label on the
12 wall or on materials that indicated potential
13 hazard from those materials?

14 A No.

15 Q Were you aware, sir, at the time that the OSHA
16 regulations specifically required that those
17 warnings be placed on asbestos materials in
18 place?

19 A Yes.

20 Q Okay. And how was it that you were aware of
21 that, from your understanding of the OSHA
22 regulations?

23 A Could have been from my reading it or, you know,
24 it could come from several different -- the
25 training itself; but, yeah, I -- several

1 different places.

2 Q Fair enough. I guess you would agree with me
3 then that since you recall the regulations with
4 that requirement and you've told us that you
5 don't recall warning signs being placed on the
6 materials, other than one specific instance, that
7 would ARMCO would have been in violation of the
8 regulations, at least with respect to that
9 particular item?

10 A I think that's --

11 MR. GONZALEZ: Let me object that
12 that assumes facts not in evidence.

13 A -- kind of a broad --

14 MR. GONZALEZ: Calls for speculation.

15 A -- statement because in the other places it was
16 not becoming airborne or you could not put a
17 label on a set of gloves that you were using.
18 Again, we -- so our method of handling that was
19 by substitution, getting rid of it.

20 Q (By Mr. Waters) Let's talk -- let's make sure
21 we're clear. I'm talking specifically about
22 thermal insulation materials.

23 A Oh, okay.

24 Q -- used throughout the plant. And by the way,
25 you'll agree with me, won't you, sir, that there

1 was a significant amount of steam pipes that
2 contained thermal insulation at this facility?

3 A Oh, yes.

4 Q Okay. And I think you've already testified that
5 you have a recollection that the OSHA regulations
6 required that warning signs be placed on or near
7 those materials so workers who might need to get
8 involved with those materials would know of the
9 hazard?

10 MR. ERWIN: Objection. Assumes facts
11 not in evidence. He's testified
12 concerning labeling on asbestos, but not
13 thermal insulation products in general.
14 It also mischaracterizes the facts in
15 evidence.

16 MR. GONZALEZ: Join in that.

17 Q (By Mr. Waters) Can you answer? Do you need the
18 question read back?

19 A Yeah.

20 MR. WATERS: Go ahead. Read it back
21 to him.

22 (At this time the court reporter read
23 back the requested material.)

24 A There were no warning labels that I'm aware of
25 that was on any of the insulation. And as I

1 think I stated earlier, I was told that this was
2 asbestos, but I was not -- I did not do any
3 sampling, nor did I ever take any sampling, so I
4 had no personal knowledge --

5 Q (By Mr. Waters) Okay.

6 A -- that the thermal insulation was, in fact,
7 asbestos.

8 Q You had a general understanding that it was
9 asbestos. Fair enough?

10 A Yes.

11 Q Okay. And you also had a general understanding
12 from your involvement with the regulations that
13 it was necessary and required to have these
14 signs, correct, sir?

15 A It's been such a long time with the regulations,
16 you have to be specific on regulations as to when
17 something is labeled. And I'm not aware that the
18 thermal insulation would have to be labeled. So
19 it -- I'd have to say don't know that I was
20 required to label that. That would be the best
21 way I could answer that question.

22 Q All right. Let's talk about what you do recall
23 from OSHA. You understood when you arrived in
24 1974 or shortly thereafter that there were
25 specific state and federal regulations, as well

1 as corporate policy, that governed a whole
2 variety of safety matters, correct?

3 A Sure.

4 Q Okay. And one of the safety matters that the
5 regulations and the corporate policy pertained to
6 had to do with the hazards of asbestos, correct?

7 A Yes.

8 Q Okay. Did you understand, for example, that
9 there was an exposure level above which exposures
10 should not take place because of health hazards?

11 A There was, again, a threshold limit value that at
12 some point if you exceeded that, there had to be
13 some kind of action taken, whether it be personal
14 protective equipment or engineering controls,
15 things of those nature, administrative controls
16 to eliminate the exposure or minimize the
17 exposure.

18 Q Okay. And in order to know whether or not you
19 had to take these additional measures, what you
20 would have to do is what they call in the
21 regulations initial monitoring of workplace to
22 determine the levels of asbestos dust from
23 various operations?

24 A Yes.

25 Q Okay. And you have to do that initial monitoring

1 to determine the potential level of the hazard
2 that's out there, correct?

3 A That's correct.

4 Q And you'll agree with me that -- well, asbestos
5 dust can be invisible, correct, sir?

6 A Yes.

7 Q And the only way to know whether or not you have
8 a hazard in a given area is to do air monitoring
9 to determine whether it's a safe level or an
10 unsafe level?

11 A That's correct.

12 Q Okay. One thing you know is if you actually see
13 dust from an asbestos operation, then you
14 probably have a fairly significant level. Is
15 that a fair statement?

16 MR. ERWIN: Objection. Vague.

17 A Well, as I stated earlier, I -- I don't think I'm
18 trained, either then or now, to know that dust
19 that's airborne is actually asbestos. It could
20 be different, you know, combinations. It's rare
21 that any dust is one particular compound by
22 itself.

23 Q Okay.

24 A So if I could some way determine that, yes, that
25 was asbestos and it was visible, that would be a

1 good indication that the levels were high.

2 Q All right. If you observed -- let's take a
3 hypothetical situation. If you observed an
4 operation and you knew that the insulation
5 material was asbestos, all right, and the
6 operation -- whatever it was -- was producing
7 visible dust, under those circumstances you would
8 recognize even without measurement that you had a
9 hazardous condition or a potentially hazardous
10 condition?

11 A One that, yes, deserves some attention, sure.

12 Q Okay. And you'll agree with me that if -- well,
13 strike that.

14 As far as the asbestos monitoring that you
15 have any knowledge about, that would be limited
16 to what was done at the baghouse, correct?

17 A That's the only time I can recall.

18 Q Okay. And you'll agree with me that if no
19 monitoring was done with respect to insulation
20 materials and work with or around insulation
21 materials, then we will never know what levels of
22 asbestos dust may have been created by those
23 operations?

24 A I won't know, that's correct.

25 Q Okay. What we do know is if there is dust,

1 asbestos dust resulting from work practices,
2 there are a variety of steps that can be taken to
3 reduce the potential hazard, correct?

4 A Yes.

5 Q All right. One of those you mentioned was wet
6 methods?

7 A Yes.

8 Q All right. The wet methods, the only time you
9 can recall them being used in the context of
10 asbestos at the plant was with respect to the bag
11 facility. What did you call it, the bag --

12 A Baghouse.

13 Q Thank you -- baghouse in 1976, correct?

14 A That's the only one I observed, yes --

15 Q All right.

16 A -- that I can remember.

17 Q Fair enough. Also, there's the possibility of
18 using exhaust ventilation to actually remove the
19 hazardous asbestos dust from the breathing zone
20 of the workers?

21 A That would be another method, yes.

22 Q Okay. And as you sit here today, you're not able
23 to recall engineering controls of that nature
24 being used with respect to asbestos exposure at
25 ARMCO, 1974 to 1978?

1 A None that I can recall.

2 Q Personal protective equipment. Well, we've
3 really covered that. I don't think I need to go
4 back into that.

5 Were you aware that the OSHA regulations
6 required initial asbestos monitoring be done in
7 1972 or 1971 within six months of the publication
8 of the regulations?

9 A No, I don't remember that now.

10 Q Okay. And in fairness to you, you weren't
11 employed by ARMCO in 1972, were you, or 1971?

12 A No.

13 Q Okay. But in your work at ARMCO as the
14 seniormost person concerning industrial hygiene
15 matters, you never were told and you never saw
16 any documents that indicated that ARMCO had done
17 asbestos monitoring prior to your arrival and
18 specifically in the time frame 1971 or 1972?

19 A None that I can remember.

20 MR. ERWIN: Objection. Assumes facts
21 not in evidence.

22 Q (By Mr. Waters) Okay. And just to be clear on
23 this, in '74 to '78, you're the seniormost
24 industrial hygiene person on the site, correct,
25 with that training?

1 A You keep using the word "senior." I was
2 basically the only industrial hygiene person on
3 the site.

4 Q Okay. You were senior by virtue of the fact that
5 there was --

6 A Senior that I was the only one, right.

7 Q Okay. And would you agree with me also that you
8 were the seniormost or the -- perhaps the
9 singlemost person who had knowledge and training
10 of a professional nature concerning the hazards
11 of asbestos in that time frame at the plant?

12 A That I was the only one, no. As I stated
13 earlier, Bruce Rogers had been through some
14 training, NIOSH course. Bill Chaddick who was
15 there prior to me had some training. I can't
16 testify to any of his, but I know he had spent
17 some time in industrial hygiene. So their
18 responsibilities had changed when I got there and
19 it was my -- my responsibility when I was there,
20 but they had knowledge of industrial hygiene
21 practices.

22 Q Okay. Fair enough. And Mr. Hueber obviously had
23 some knowledge of industrial hygiene?

24 A Oh, yes. Yes.

25 Q Okay. And the OSHA regulations in Subsection "H"

1 should inform them if they're exposed to
2 asbestos, but you should inform them of the
3 potential hazard that is presented by asbestos in
4 the workplace. Do you recall that?

5 A Not specifically; but, you know, I would think
6 that was in the standard, sure.

7 Q Fair enough. And the whole point of the federal
8 government having regulations to require
9 employers to tell their workers about this
10 asbestos hazard is so that those workers can take
11 their own precautions, use respiratory protection
12 and try to avoid developing diseases like cancer
13 years down the road?

14 MR. GONZALEZ: Argumentative.

15 MR. ERWIN: Join. Calls for
16 speculation.

17 A Yeah. If that's your question, yes.

18 Q (By Mr. Waters) We talked about safety meetings.
19 Do you recall that there was a safety handbook
20 that ARMCO gave to its employees?

21 A Yes.

22 Q And will you degree with me that the best place
23 to put warnings about potential hazards and
24 potential dangers in the workplace and have it
25 available for the employees to read is going to

1 process? And if you don't recall, that's fine.

2 A I think I had a dust respirator, but I couldn't --
3 I don't recall. I had respect for asbestos, so I
4 would say I probably did, but --

5 Q Okay.

6 A -- I don't know.

7 Q You had respect for the hazards because you had
8 been trained professionally and you had learned a
9 little bit about what asbestos can do to the
10 human body?

11 A Yes.

12 Q And as a result of that knowledge, that training
13 and that respect, you were much more likely to
14 take precautions in the event there was a
15 potential exposure on your part?

16 A Well, I did for the employees there because they
17 were the ones that were handling the asbestos and
18 that was the reason for having them wear the
19 disposable clothing and the two sets of
20 respirators and that sort of thing, yes.

21 Q All right. Any reason you can think of that my
22 client, or my client's husband in this case,
23 should not have been told that asbestos could
24 cause cancer 20 or 30 years later when he worked
25 around asbestos in the '60's and '70's?

1 and is argumentative.

2 MR. GONZALEZ: I'll join.

3 A I'll agree with you on the -- on the respect that
4 I fully agree that employees should know what
5 they're being exposed to.

6 Q (By Mr. Waters) Okay. Any reason you can think
7 of to not tell employees that they're working
8 around cancer-causing substances?

9 A Not a good reason, no.

10 Q Fair enough. You don't know what Mr. Pyle looked
11 like?

12 A No.

13 Q Okay.

14 A No.

15 Q And do you have any recollection as you sit here
16 today of any other electricians or motor
17 inspectors who you knew personally during that
18 time frame?

19 MR. GONZALEZ: I'm going to object to
20 the extent that it assumes that he knew
21 Mr. Pyle personally by the way that
22 question is being framed, so it's assuming
23 facts not in evidence.

24 MR. ERWIN: Join.

25 A Could you repeat the question, please?

1 MR. ERWIN: Objection. Vague and
2 ambiguous. Overly broad.

3 A You're way out of my league. I -- I don't know
4 what the requirements are.

5 Q (By Mr. Waters) Okay. No opinion on that one way
6 or the other at this point in time?

7 A Yeah, it would be no opinion.

8 Q Okay. Are you aware or have you been made aware
9 of the fact that ARMC0 produced
10 asbestos-containing products?

11 A ARMC0 produced -- no, I'm not aware of t t.

12 Q Okay. Would you generally agree with me, sir,
13 that a company that -- that utilizes chemicals or
14 toxic substances in its production of products
15 should -- should have an understanding of the
16 potential hazards of those chemicals or toxic
17 substances?

18 MR. ERWIN: Objection. Vague,
19 ambiguous, overly broad. Calls for
20 speculation.

21 A Again, I would suppose so.

22 Q (By Mr. Waters) When you arrived in '74 there was
23 some monitoring equipment already available,
24 correct?

25 A Yes.

1 Q Okay. Let me show you what's been marked as
2 Schmidt Exhibit No. 1, which is a print from the
3 United States Department of Labor Occupational
4 Safety and Health Administration. Do you see
5 that?

6 A Yes.

7 Q And that's the -- the umbrella organization for
8 OSHA, correct, the United States Department of
9 Labor?

10 A Yes.

11 Q All right. And in this instance they ran a
12 search from July, 1972 through December, 1979 and
13 catalogued all of the violations that ARMCO
14 facilities had in that time frame. And you'll --
15 see the little numbers there under "VIO" for
16 violations?

17 A Uh-huh.

18 Q And you'll see over here on the right there are a
19 number of the -- that refers specifically to the
20 Houston facility. Okay. And some of these other
21 facilities -- for example, Middletown, that's --
22 we've talked about that, haven't we?

23 A No, I don't remember you mentioning Middletown,
24 but I know of Middletown, yes.

25 Q All right. Okay. I don't want you to count

1 those up, but I want you to assume with me that
2 there are a total of 720 OSHA violations in the
3 time frame that we justified discussed. That's
4 seven years or so, a little more than a hundred a
5 year, about one every three days.

6 Now, do you recall, sir, that there were a
7 significant number of OSHA violations in the
8 company at large in the 1970's?

9 MR. ERWIN: I'm going to object to
10 all the side-bar and lack of foundation of
11 this document or authenticity of this
12 document.

13 MR. GONZALEZ: Join.

14 MR. WATERS: You can answer.

15 A For the size of the company and the fact that's
16 all of the locations for ARMC0 -- I noticed that
17 there were several of them there -- no, I don't
18 consider that to be excessive.

19 MR. WATERS: Okay. Objection to the
20 nonresponsive portion.

21 (Whereupon, Schmidt Exhibit No. 2 was
22 marked for identification.)

23 Q (By Mr. Waters) Let me show you Exhibit No. 2,
24 which is a -- let's see -- which relates to a
25 specific series of inspections at the -- let's

1 see -- Kansas City facility. Do you see that?

2 A Yes.

3 Q All right. And it indicates -- let's see. Where
4 is the -- where is the section for this? Oh, the
5 bottom. Okay.

6 And just so we're clear on this, the OSHA
7 regulations are Section 1910.1001. Do you recall
8 that?

9 A Yeah.

10 Q All right. And here we see that as late as 1976
11 there are a series of violations related to
12 asbestos and pertaining to the asbestos
13 regulations, at least at the Kansas City
14 facility. Do you see that?

15 A I --

16 MR. GONZALEZ: I'm going to object.

17 That document speaks for itself.

18 A -- don't know that's what that says, but, you
19 know --

20 Q (By Mr. Waters) Okay. Well, let's look here. It
21 says "standard", okay, and it says "1910.001 --
22 see the 1910.1001 right there?

23 A Oh, I see what you're saying.

24 Q Okay.

25 A Okay.

1 A Research to OSHA --

2 Q With respect to OSHA violations, were you asked
3 by ARMCO to do any research --

4 A Oh, you mean just recently?

5 Q Yes, sir, concerning this case.

6 A No.

7 Q Okay. You'll agree with me that unless an
8 employee complained about asbestos to OSHA at the --
9 one of the ARMCO facilities, it would be very
10 unlikely for a violation or an inspection to take
11 place?

12 MR. ERWIN: Objection. Vague and
13 ambiguous. Are you talking about OSHA
14 inspections, Andy? I'm sorry.

15 MR. WATERS: Yeah. Sorry.

16 A Well, there's other ways that OSHA does
17 inspections and they do general inspections on
18 occasion based on your injury frequency and
19 things of that nature, and that could initiate a
20 citation on just about anything.

21 MR. WATERS: Let me object,
22 nonresponsive.

23 Q (By Mr. Waters) Let me take you back to your
24 testimony earlier when I think you said that the
25 OSHA inspections generally resulted from employee

1 it, I don't know that there could be a violation,
2 but --

3 Q (By Mr. Waters) Okay. So what you're saying is
4 if a company isn't aware that exposures are
5 taking place, then they have no responsibility to
6 address the exposures?

7 MR. GONZALEZ: Objection.

8 Argumentative.

9 A No. I think that's twisting of what I said.
10 It's that if I don't know there's an exposure to
11 asbestos and the worker didn't know there was
12 exposure to asbestos, would there be a citation
13 there? No, not unless somebody knew.

14 Q Right.

15 A You know, so --

16 Q And certainly the employer is in a much vastly
17 better position than the employee to determine
18 whether or not exposures are taking place?

19 A Well, not necessarily because, again, I was one
20 person out of almost 5,000, so I certainly didn't
21 know what each person on a day-to-day basis had
22 for an exposure. Each person obviously is going
23 to know that better. But if you're talking
24 technically, I had probably the best expertise,
25 absolutely.

1 extent this document speaks for itself.
2 There's no foundation. It's improper
3 cross-examination.

4 Q (By Mr. Waters) Okay. Were you ever told, sir,
5 that ARMC0 had been part of an organization that
6 as early as 1935 had warned of the hazards of
7 asbestos?

8 MR. ERWIN: Objection. Assumes facts
9 not in evidence.

10 A No.

11 MR. ERWIN: Calls for speculation.

12 Q (By Mr. Waters) Let me turn to the next page and
13 ask you to follow along here. Let me -- let's
14 see. "I think we need to digress for a moment to
15 visualize what is meant by five million particles
16 of dust of such tiny size."

17 Now, let me ask you first: Were you aware,
18 sir, that the TLV at one time, threshold limit
19 value, was five million particles per cubic foot?
20 Do you recall that one way or another?

21 A No, no.

22 Q Okay. Fair enough. It goes on to state, "We
23 know it's invisible" -- that's five million --
24 "to the naked eye because it takes 15 to 20 times
25 that much to produce a haze, and even that isn't

1 visible as particles of materials."

2 Do you have any recollection of ever being
3 told what levels of dust were indicated if you
4 could actually see the dust?

5 MR. WATERS: Objection to the
6 side-bar preceding the question, reading
7 the document which there's no foundation
8 for, and it's improper cross-examination.

9 A I don't recall in the training what we were told
10 in terms of how to determine it, again, because
11 of -- you don't know what the content of the dust
12 is just by visually looking at it.

13 Q (By Mr. Waters) Okay. Fair enough. Now, let's
14 look over here. It says, "If you can see the
15 dust, you know it to be a terrific hazard."

16 First of all, did I read that sentence
17 correctly?

18 MR. ERWIN: Again, objection. Lack
19 of foundation for this particular
20 document. Object to the side-bar reading
21 the document into evidence. Improper
22 cross-examination.

23 A Yes, what you read is what's on the page.

24 Q (By Mr. Waters) Okay. And would you agree with
25 that, sir, that if you can see the dust --

1 whether it's in 1935 or 1975 -- you know you've
2 got a significant hazard?

3 MR. GONZALEZ: Object on the basis
4 that the question is vague as to what kind
5 of dust.

6 MR. ERWIN: Join.

7 A Well, the answer is not necessarily because I've
8 seen some where you could see the dust and it
9 didn't -- and the standard was below the TLV.

10 Q Okay.

11 A I assume you're not talking about asbest ,
12 you're talking dust. You said dust.

13 Q Fair enough.

14 A Okay.

15 Q Let me show you what's been marked as ARO-2,
16 which is the State of Ohio legal requirements for
17 the prevention and control of industrial public
18 health hazards dated 1946.

19 Now, firstly, was ARMCO headquarters,
20 corporate headquarters, in Ohio?

21 A Yes.

22 MR. ERWIN: 1936?

23 MR. WATERS: '46.

24 MR. ERWIN: 1946.

25 Q (By Mr. Waters) Were you aware, sir, that in 1946

1 deposition, but --

2 MR. WATERS: It's -- you haven't
3 waived anything. The objection is there.

4 Q (By Mr. Waters) Were you also familiar with the
5 fact that ARMCO was a member of the Industrial
6 Hygiene Foundation? Did you become aware of that
7 fact?

8 A I don't recall that.

9 Q I want you to assume that Mr. Simpson has
10 testified in his capacity as an industrial
11 hygienist that the Industrial Hygiene Digest and
12 the Industrial Hygiene abstracts were routinely
13 received and reviewed by safety professionals for
14 ARMCO within the corporation. Can you assume
15 that fact for me?

16 A Sure.

17 Q All right. I'd like you to look at the
18 Industrial Hygiene Digest for June of 1953 and in
19 particular down here, an abstract for an article
20 entitled "Lung Carcinoma Caused By Asbestos
21 Inhalation."

22 First of all, just from the standpoint of
23 the terminology, what is meant by lung carcinoma?

24 A Cancer of the lung.

25 Q Okay. All right. Let me show you another one,

1 Industrial Hygiene Digest, September, 1955, an
2 article abstract entitled, "Mortality from Lung
3 Cancer in Asbestos Workers," by Dr. Doll in the
4 British Journal of Industrial Medicine.

5 Mortality, that's death, isn't it, sir?

6 A Yeah, I suppose so.

7 Q Okay. So that if ARMCO were to have read this
8 abstract or this article back in 1955, they would
9 have understood that persons exposed to asbestos
10 can get lung cancer and -- which can result in
11 mortality or death?

12 A A lot of speculation, I assume, but, yeah.

13 Q Okay. That was ARO-106.

14 Let me show you the Industrial Hygiene
15 Digest from February of 1956 and in particular an
16 abstract indicating asbestosis and pulmonary
17 carcinoma in an asbestos spinner, notes on the
18 induction of lung cancer by asbestos fibers.

19 With respect to your own training and
20 experience, do you think it would have been that
21 early 1975 NIOSH course where you first learned
22 that asbestos fibers could cause lung cancer?

23 A That's the first time?

24 Q Yes, sir.

25 A I assume so.

1 that you take him on cross-examination and
2 clarify to the extent you wish to --

3 MR. MARKS: Well, I object to the
4 form of the question to the extent that
5 you are using a term this witness is not
6 familiar with, and to the extent that it
7 injects misleading testimony into the
8 record, we object to it.

9 Q (By Mr. Waters) All right. And here's one: "Are
10 silicosis and Asbestosis Predisposing Causes of
11 Cancer of the Lung," from -- again, from March,
12 1960.

13 Did you all use silica out there, as well?
14 Was there silica dust as a result of your
15 operations?

16 A Yes, there was.

17 Q Okay. Did you consider silica dust to be a
18 hazard --

19 A Yes.

20 Q -- when you worked out there? Okay.

21 Let's go back to ARO-191, which is another
22 National Safety Counsel publication from 1961
23 where the National Safety Counsel indicates, "We
24 know that asbestos dust causes a serious lung
25 disease called asbestosis."

1 A No, I don't know what that means.

2 Q All right. Fair enough. Did you ever hear of
3 the name Dr. Irving Selikoff as being a physician
4 involved with researching the hazards of asbestos
5 and diseases caused by asbestos?

6 A No.

7 Q Doesn't ring a bell?

8 A No.

9 Q Now, Mr. Simpson told us that he started working
10 for ARMC0 in '64 or '65 and that in that capacity
11 he began to review Industrial Hygiene Digest
12 materials; that is to say they would collect in
13 his in box, he would review them, he would pass
14 them on to someone else. Is that a similar-type
15 procedure that you recall concerning circulation
16 of articles of interest?

17 A I just know what he sent to me. I don't know how
18 he went about deciding what to send.

19 Q Okay. Did he just send those to you in the
20 Houston plant or would those types of articles
21 about asbestos and cancer and other issues have
22 been sent to Mr. Hueber, as well, or some of the
23 other folks?

24 A I don't recall.

25 Q Okay. Let me show you this one that Mr. Simpson

1 The reference, there's a discussion about
2 occupational health and the construction industry
3 and the reference indicates, "Articles appear
4 from time to time in the American literature on a
5 specific health hazard such as lung cancer and
6 asbestos insulators."

7 Did you understand that asbestos
8 insulators, people who worked day in and day out
9 with asbestos products were at a significant risk
10 of developing cancer when you first got to ARMCO
11 or within a few months of getting to ARMCO?

12 A I'd have to say I don't know.

13 Q Okay. Let's look at the next page. And for the
14 record, this is Page 22 talking about health
15 hazards. "The equipment operator is not alone in
16 facing these hazards. The recent replacement of
17 the plasterer's conventional trowel with a spray
18 nozzle has introduced serious hearing loss
19 problems." Okay. "Further, the gun application
20 of asbestos-contained fireproof coatings
21 continues without control and without concern.
22 Yet data coming in regularly from studies of men
23 working around asbestos dust leave very little
24 doubt that the gun operator and other craftsmen
25 in the area are being subjected to the risks of

1 the asbestosis and lung cancer."

2 Now, my specific question is: If you
3 recognized in 1974, 1975, that it wasn't just
4 insulators or working -- people working hands-on
5 with asbestos who were at risk but that the dust
6 could travel and migrate and that bystanders or
7 people in the area who were exposed to it could
8 be equally at risk?

9 MS. ALVARADO: Objection to the
10 document. Objection to foundation,
11 authenticity and objection to relevancy.

12 MR. GONZALEZ: Objection to the
13 side-bar.

14 MR. MARKS: Join in the objection.

15 MR. ERWIN: Join.

16 MS. KUGLER: Join.

17 MR. WATERS: You can answer it.

18 A I guess the answer is I don't recall.

19 MR. WATERS: All right. Do you have
20 a lot of redirect?

21 MR. ERWIN: No. Can we take two
22 minutes?

23 MR. WATERS: Well, I'm not -- I'm not
24 finished yet.

25 MR. ERWIN: No, I don't want to go

1 off the record either, but just let me
2 step out for one second and let's see what
3 his flight situation is. We really didn't
4 get a handle on that, I don't think.

5 MR. WATERS: Oh, on timing or --

6 MR. ERWIN: Just so he'll know, I
7 mean, and if we need to make plans. We've
8 got about -- I assume you have ten more
9 minutes?

10 MR. WATERS: Yeah, give or take.
11 It's 1:18 right now.

12 MR. ERWIN: I understand.

13 (At this time Mr. Erwin left the
14 deposition room. Upon his return the
15 proceedings resumed as follows:)

16 MR. ERWIN: Okay. I'm back, Andy.

17 MR. WATERS: Okay. And what -- and
18 do you know anything different or --

19 MR. ERWIN: Yeah. He would need to
20 leave at 2:00.

21 MR. WATERS: Okay. That's fine. I'm
22 trying to find -- oh, here it is.

23 Q (By Mr. Waters) I think you told us earlier that
24 Mr. Hueber would probably be -- would probably
25 have been in a better position to assess how

1 ARMCO was addressing or dealing with the asbestos
2 hazards or the potential asbestos hazard at the
3 Houston facility?

4 A He was there longer and had access to some people
5 more than I did. So I'd have to assume, yes.

6 Q Did you have any -- or do you recall having any
7 discussions with Mr. Hueber where y'all talked
8 about the fact that the asbestos situation at the
9 plant was a potential problem?

10 A I just don't recall any conversation.

11 Q Okay. Would you agree with me, sir, the ARMCO
12 was a sufficiently large and sophisticated
13 company that would be able at all relevant times
14 to know and understand the potential hazards in
15 its plant?

16 MR. ERWIN: Objection. Calls for
17 speculation, overly broad, vague.

18 A Well, we had a good expertise, I felt like, of
19 assessing what our hazards were in the plant, if
20 that answers your question.

21 Q (By Mr. Waters) All right. Would you agree with
22 Mr. Hueber that in addition to housekeeping being
23 sloppy at the plant that storage was also
24 hazardous?

25 MR. ERWIN: Objection. Misstates the

1 facts in evidence.

2 A Again, that's a very general statement. I don't --
3 I don't really agree that housekeeping was always
4 sloppy and that -- what was the other -- storage
5 was hazardous?

6 Q Hazardous, yeah.

7 A Again, I don't know what he's talking about
8 there.

9 Q Okay. You said just now that you don't agree
10 that housekeeping was always sloppy, but I take
11 it from that that there were times when in your
12 walk-throughs of the plant you recognized and
13 were concerned that housekeeping was not what it
14 should be?

15 A Yes.

16 Q And Mr. Hueber has told us in a document that the
17 jury will have seen that his concerns about
18 housekeeping and storage, that those -- and I
19 quote -- "give you an indication of their safety
20 attitude and effort because these are two of the
21 first things a safety-conscious management
22 attends to."

23 Do you agree with Mr. Hueber that
24 housekeeping and storage are two of the first
25 things that a safety-conscious management attends

1 to?

2 A It's important in a safety program, sure.

3 Q Are you aware of the fact that ARMCO made efforts
4 to combat government requirements or
5 recommendations for health and safety or water
6 those downs?

7 MR. ERWIN: Objection. Calls for
8 speculation, misstates the facts in
9 evidence.

10 MR. GONZALEZ: Argumentative.

11 A I'm not aware of that, no.

12 Q (By Mr. Waters) Did you have any involvement
13 personally with the lobbying process concerning
14 the implementation of federal or state
15 regulations?

16 A No.

17 Q Would you have been at the plant on October 2nd,
18 1974? I mean, had you started working there by
19 then?

20 A Yes, I had started working there by then.

21 Q Were you familiar with the fact that there was an
22 OSHA inspection at that time?

23 A Since you told me I guess I do know, but I
24 wouldn't have recalled it, no.

25 Q All right. Do you recall that there was a

1 problem indicated with workers breathing -- and I
2 quote -- "excessive amounts of dust" -- end
3 quote? Do you have any recollection of that?

4 A No. No.

5 Q Let's talk a little bit about medical
6 examinations. Are you aware that the -- that in
7 general the regulations require medical
8 examinations of persons exposed to asbestos?

9 A Yeah, I think that was part of the standard.

10 Q And that was to be done on an annual or a
11 routine-type basis?

12 A Again, I'd suppose so. I don't recall the
13 standard specifically.

14 Q Okay. Let's see. Were you aware that ARMCO was
15 advised in 1970's -- July of 1976 and
16 acknowledged that insulation materials in its
17 plants could exceed OSHA limits?

18 MR. ERWIN: Objection. Assumes facts
19 not in evidence. Mischaracterizes the
20 evidence.

21 A I don't recall. Is it a document or something?

22 I --

23 Q (By Mr. Waters) Yeah, let me show you. Let's
24 see. It's from Mr. Simpson. It's ARO-36, July
25 14, 1976. And Mr. Simpson is sending it to the

1 industrial hygiene mailing list. Would that
2 include you -- would that have included you?

3 A I would think so.

4 Q Okay. Then at the bottom he indicates a couple
5 of other people, Mr. Howard, Mr. Claibore and Mr.
6 Tranter?

7 A Yes.

8 Q Were they also at the Houston plant?

9 A No. They were at corporate.

10 MR. WATERS: Okay. And for the
11 record, that's 36.

12 Q (By Mr. Waters) Does it sound about right that
13 the baghouse work that you discussed the incident
14 took place on August 19, 1976?

15 A If that's what the document says, then I would --
16 I would go with that, yes.

17 Q And do you recall the results of some of the
18 sampling? Do you recall that some of the levels
19 were in excess of the OSHA permissible limits?

20 A I believe they were.

21 Q Okay.

22 A And the samples were taken outside of the
23 protective clothing.

24 MR. WATERS: Okay. Let me object to
25 the nonresponsive portion.

1 Q (By Mr. Waters) Were you still there in May -- on
2 or about May 25th of 1978?

3 A Working for ARMCO?

4 Q Yes, sir.

5 A Yes.

6 Q And were you still in your capacity as industrial
7 hygienist?

8 A That's real close.

9 Q Is it?

10 A That's about the time I transferred. Now, I
11 don't remember the exact date of when I moved
12 from safety to labor relations.

13 Q We'll take a look at the specific document.

14 Okay. Did Mr. -- did the ARMCO lawyer show you a
15 document, which I've got marked as ARO-45, from
16 yourself to Mr. McWhirt?

17 A I have seen this.

18 Q Did you see it recently?

19 A Yeah.

20 Q Okay. Let me just ask you a question or two
21 about that.

22 A Oh, sure.

23 Q This has to do with asbestos sampling at the wide
24 flange substation in May of 1978; is that
25 correct?

1 A I don't know if that's when the sampling took
2 place. That's when the letter was written.

3 Q All right. Fair enough. And it goes on to state
4 it's the results of a survey that you apparently
5 did. "In all cases but two, the shops
6 electricians' exposure exceeded the OSHA
7 standard."

8 Do you have an independent recollection
9 that, in fact, in all of the samples except for
10 these two, that you had excessive levels?

11 A I knew there was some that were. You know,
12 without reading the letter or looking at the --

13 Q The result?

14 A -- report, yeah. It's just been 20-something
15 years ago.

16 Q Do you recall it says, "In one case the
17 employees' exposure was almost 20 times the
18 standard." Do you see that?

19 A Yes.

20 Q All right. Is that something that gave you cause
21 for concern?

22 A That was one of the reasons why we did the
23 precautions that we did when they were doing the
24 baghouse sampling or baghouse removal of the
25 asbestos by putting on the protective clothing

1 and the respirator.

2 MR. WATERS: Objection.

3 Nonresponsive.

4 Q (By Mr. Waters) My specific question is if you
5 recall at this time being concerned that
6 electricians were being exposed to almost 20
7 times the standard?

8 A Yes.

9 Q You also stated that, "Also, before this job is
10 done again, I would like to know if it is
11 economically feasible for this job to be done by
12 a contractor."

13 Do you recall being concerned or being
14 interested in that recommendation?

15 A I wrote it, yes.

16 Q Do you recall, sir, that these individuals who
17 were exposed, as well as the people who were
18 exposed to the baghouse, were actually never
19 given their medical monitoring examinations? Do
20 you realize that?

21 MR. ERWIN: Objection. Assumes facts
22 not in evidence. Calls for speculation.

23 A I don't know that that is a fact.

24 Q Do you recall a concern about the cost of medical
25 monitoring; that is to say, X-ray examinations

1 for employees who were exposed to asbestos in the
2 plant?

3 A No.

4 Q Were you involved when a hazardous materials
5 committee was finally appointed in 1979 to review
6 procedures for limiting exposures to asbestos and
7 other toxic substances? Would you have been out
8 of the loop by then?

9 A I would have been out of the loop.

10 Q All right. Let me show you what has been marked
11 ARO-47, a memo from Mr. Hueber to Mr. Hardin,
12 September 20, 1979. Who was Mr. Hardin?

13 A He was the assistant to the works manager --

14 Q Okay.

15 A -- which is equivalent to the personnel manager.

16 Q All right. And the subject here is problem
17 areas, 1980, and how to copy with them. Was this
18 something Mr. Hueber would do at the end of each
19 year, is sort of provide a checklist of things we
20 need to work on or problems that we have? Do you
21 recall that?

22 A I don't know why he wrote that, no.

23 Q Okay. I want to direct your attention to Page 4
24 of the memorandum, and it discusses asbestos as
25 one of the problem areas for 1980.

1 "As asbestos materials are replaced, we
2 will need to begin exposure monitoring on all
3 tear-out operations. This will be an extremely
4 time-consuming task and as a result has only been
5 done on a few occasions in the past. Now, I take
6 it from your earlier testimony that if monitoring
7 had been done on tear-out work, it was not
8 something that you would have been involved with,
9 at least that you can recall?

10 A I don't recall doing any, no.

11 Q Ok. And you've not been shown or had an
12 opportunity to review any records that would
13 indicate that any sampling or monitoring was ever
14 done around asbestos pipe covering or asbestos
15 thermal insulation operations, whether it be new
16 installation or tear-out work?

17 A Some of the documents I was shown I think had
18 some asbestos monitoring, but I -- Scott did, but
19 I don't -- I don't know what he was sampling.
20 Again, I wasn't a firsthand party to that.

21 Q All right. Let me show you ARO-56 and ask you to
22 take a second look at that.

23 A (Witness complying)

24 Q Just a brief question about it: Were you aware,
25 sir, that in 1983 it was confirmed that one of

1 the ARMCO employees had developed asbestosis as a
2 result of his employment at the facility?

3 A No, I don't think I knew this.

4 Q Okay. All right. Would you agree with me, sir,
5 that this document from ARMCO confirms that there
6 were sufficient exposures at the plant for
7 employees such as this gentleman to develop
8 asbestos disease?

9 A I don't think I could make that speculation
10 because I don't know what Mr. Sally's years of
11 service or what his prior exposures were at some
12 other location or on his off hours. I mean --

13 Q Okay.

14 A -- not from that document I couldn't, no.

15 Q All right. When was the Houston ARMCO facility
16 closed?

17 A I think in early '84.

18 Q Okay.

19 A I don't know the exact date. I'd already left
20 the company at that time?

21 Q All right. Were you aware, sir, that an asbestos
22 survey was completed of the plant in November and
23 December of 1986?

24 A No.

25 Q Okay. Let's take a look briefly at this -- what

1 MS. KUGLER: Same objection. Also
2 assumes facts not in evidence.

3 MR. ERWIN: Join.

4 A I wasn't involved with any of -- anything dealing
5 with either safety or health in that respect
6 after really about '78.

7 Q (By Mr. Waters) All right, sir.

8 A I don't know if that answers your question.

9 Q Was it your understanding as of '83 that asbestos
10 materials, to the extent possible, had been
11 substituted and non -- I'm sorry -- that
12 nonasbestos materials had been substituted for
13 asbestos materials?

14 A In 1983?

15 Q Yes, sir.

16 A No. I'm not aware.

17 Q Okay. As far as you knew in 1983, asbestos
18 materials were still being utilized at the
19 facility?

20 A I have no knowledge that they were or weren't.

21 Q Okay. Now, you mentioned an earlier storage
22 facility of some sort. I think we were talking
23 about some equipment. Were there facilities or
24 warehouses at the plant where materials were
25 retained for future use that were used in the

1 operations of the plant and maintenance?

2 A There was a purchasing --

3 Q Warehouse?

4 A -- department, stores, yeah.

5 Q All right. Well, let's take a look at Page 14
6 where this asbestos survey under "warehouse,"
7 they indicate: "The warehouse contains several
8 boxes of precast Johns-Manville Thermobestos pipe
9 insulation. ARMC0 employees believe this to be
10 nonasbestos; however, it appears to be the same
11 material that was sampled in the operations area
12 and found to be asbestos."

13 My question to you, sir, is if you have any
14 opinion as to whether or not workers should be
15 told that a material is nonasbestos when, in
16 fact, it contains asbestos?

17 MR. ERWIN: Objection. Assumes facts
18 not in evidence. Mischaracterizes the
19 evidence. Calls for speculation.

20 A I guess to answer your question, yeah, if someone
21 is going to be exposed to something and if they
22 have that knowledge, it should be shared with
23 them, sure.

24 Q Right. And certainly you'd agree with me that it
25 would be entirely inappropriate to tell an

1 employee -- specifically tell him that the
2 materials were nonasbestos when, in fact, they
3 contained asbestos?

4 MR. ERWIN: Objection. Assumes facts
5 not in evidence. Calls for speculation.
6 Mischaracterizes the evidence.

7 A If that were the case, then, yes.

8 Q (By Mr. Waters) All right, sir. On Page 15 under
9 "blast furnace maintenance shop," it indicates,
10 "Cartons of Johns-Manville Thermo 12 are
11 scattered south of the building. Since these
12 cartons are in list on following page, it must be
13 considered as containing asbestos."

14 Can you think of any reason why asbestos
15 insulation materials would have been scattered on
16 the outside of the blast furnace maintenance shop
17 in 1986?

18 A I would have no knowledge of why it would.

19 Q As an industrial hygienist and a person trained
20 in industrial safety, sir, would that be a matter
21 of concern to you that as late as 1986 these
22 materials were still available and apparently
23 were available for potential use at the facility?

24 MR. ERWIN: Objection. Assumes facts
25 not in evidence. Calls for speculation

1 and mischaracterizes the evidence.
2 There's been no testimony that those were
3 available for use or being used. You said
4 1986, two years after the plant shuts
5 down.

6 MR. WATERS: You can answer, sir.

7 A Okay. If I understand the question, my answer
8 would be no because it's not being used and there
9 were no employees basically left at that point.

10 Q (By Mr. Waters) Okay. Were you aware that that
11 particular product, Johns-Manville Thermo 12 and
12 Thermobestos insulation were no longer
13 manufactured after 1972 because Manville had come
14 up with an asbestos-free replacement?

15 A No. I'm not familiar with Johns-Mansville's
16 products at all.

17 Q In the context of your substitution efforts, did
18 you become aware of that or have any knowledge
19 that Johns-Manville was substituting nonasbestos
20 products in the early '70's?

21 A No, I don't recall.

22 Q How actively were you involved with this
23 substitution process that ARMCO was interested in
24 doing?

25 A To the effect the one example I can think of is

1 MR. WATERS: Let me just look over my
2 notes, Mr. Schmidt.

3 MS. KUGLER: I'm sorry. Have we
4 messed up your order?

5 MR. BRADY: I'm trying to remember
6 where they go here.

7 MR. WATERS: I'll pass the witness.

8 MR. ERWIN: You guys have any
9 questions?

10 MR. GONZALEZ: I have some questions
11 for Mr. Schmidt.

12

13

EXAMINATION

14

15 BY MR. GONZALEZ:

16 Q Mr. Schmidt, my name is Juan Gonzalez. I'm an
17 attorney for two of the defendants in this case.

18 Do you have or are you aware of any facts,
19 evidence or information that any products
20 manufactured, produced by or distributed by
21 Pittsburgh Corning Corporation that may have
22 contained asbestos was present anywhere in the
23 ARMCO plant we've been talking about?

24 A I have knowledge -- no knowledge of it.

25 Q Do you have or are you aware of any facts,

EXAMINATION

BY MR. MARKS:

Q Mr. Schmidt, my name is Alan Marks. I represent Brown & Root, U.S.A. I have a few questions to ask you.

The work that Brown & Root did out at the plant, Brown & Root used their own personnel and their own supervision to perform those tasks?

A As far as I know, yes.

Q ARMCO people, ARMCO personnel -- for example, an electrician or motor inspector -- would not work on Brown & Root jobs?

A I have no knowledge of it, no.

Q Okay. ARMCO people would not work under Brown & Root supervision, would they?

A I have no knowledge of doing that and it would not be consistent with the plant, no.

Q Okay. ARMCO had its own maintenance department, did it not?

A Oh, yes.

Q About how many people were in that maintenance department?

A I think at one time at the peak of employment it was around 1,500.

1 Q Brown & Root did construction repair work on real
2 property, fixtures like equipment, machinery and
3 buildings. Is that your recollection?

4 A Again, construction was, you know, and some
5 maintenance, I suppose, is what they did. I
6 didn't really usually follow up with what exactly
7 they did, yeah.

8 Q They built things, they installed machinery?

9 A Right.

10 Q Laid foundations?

11 A Ye .

12 Q Did dirt work?

13 A Yes.

14 Q Okay. Brown & Root had it's own safety
15 department?

16 A As far as I know, yeah.

17 Q And they took care of their employees?

18 A Yes.

19 Q And you were part of ARMCO's safety department?

20 A That's correct.

21 Q And your responsibility was the ARMCO employees?

22 A That's correct.

23 Q And if an ARMCO employee had a safety concern,
24 they would go to ARMCO safety personnel?

25 A Hopefully.

1 you wrote in this letter about your inquiry as to
2 whether it would be economically feasible for a
3 contractor to do their job in the future, what
4 did you mean by that, sir?

5 A Well, as with anything, this was not our
6 specialty. Some of the employees themselves were
7 not happy about doing this job and this was not
8 something that they normally did and we're not
9 very familiar with. And there were a lot of
10 concerns about the asbestos which were, you know,
11 something they expressed to me. So I -- I'd put
12 it in the letter that maybe we could have a
13 contractor do it, which is people who have done
14 on this many occasions who are familiar with the
15 hazards and take the precautions and are used to
16 it.

17 Q Okay. Some questions were -- or we've discussed
18 earlier monthly safety meetings, and you were
19 telling us about the management-level meetings.

20 A Yes.

21 Q Are you aware of regular-scheduled worker safety
22 meetings, as well, that took place out at the
23 plant?

24 A Yes.

25 Q Okay. And were those, as well, on a monthly

1 basis?

2 A Yes. Each supervisor in every area which, you
3 know, again, it was at least 50 departments. I
4 don't know how many supervisors there were. I
5 think at one time there was like 300 or 400
6 supervisors. They were required to do monthly
7 safety meetings.

8 Q You responded to one of Mr. Waters' questions
9 that asbestos was given a limited focus at the
10 Houston Works while you were there. Can you
11 explain to the jury why?

12 A There were many other air, I guess, dust problems
13 that we were looking at. The biggest one was the
14 Coke oven emissions. It was getting a lot of
15 attention from the federal government and they
16 were changing the standard and we wanted to make
17 sure that we were in compliance. There was a
18 number of employees down in the Coke ovens that
19 were exposed to Coke oven emissions so that we
20 wanted to make sure that we had all of that under
21 control.

22 Q Other than the baghouse situation that we've
23 talked about, were you aware of any other people
24 at ARMO Houston Works facility who were exposed
25 on a regular basis to asbestos-containing

1 was because I think Mr. Waters asked you some
2 questions where -- and, again, the word
3 "insurance" came up -- as to when you recall
4 taking that correspondence course. Okay?

5 A Okay.

6 Q Are you with me?

7 A Sure.

8 Q All right. Mr. Schmidt, after you started work
9 at ARMCO, did you undergo any training in the
10 area of industrial hygiene?

11 A Yes.

12 Q And where?

13 A I took a correspondence course. I took a NIOSH
14 550 course and then also a course offered by
15 Texas Safety Association.

16 Q And when did the correspondence course, when did
17 you take that?

18 A That was almost immediately after my employ at
19 ARMCO.

20 MR. ERWIN: Okay. I believe that's
21 all the questions I have.

22

23

24

25

FURTHER EXAMINATION

BY MR. WATERS:

Q Just a couple of follow-ups. You were asked some questions about some products and whether or not you had any recollection of the products being used at the facility. First of all, you wouldn't have any knowledge about what was used at the facility prior to 1974 under any circumstances, would you?

A No.

Q Okay. And your job title and your job description, you weren't in a position to discover one way or another what products may have been used at the plant or may have been purchased for use at the plant prior to your arrival?

A Not unless I just saw a document to that effect.

Q Okay. You were asked some questions about the steel girders or the steel structures of the buildings and specifically as to whether or not there was material on some of the steel or insulation on some of the steel. As you sit here, is it a fair statement that you are not able to recall whether there may or may not have

1 been some steel materials, steel structures that
2 contained insulation or had insulation placed on
3 them at some point in time?

4 MS. KUGLER: I'm going to object. It
5 misstates prior testimony.

6 MR. GONZALEZ: I join in that
7 objection.

8 A I don't -- I don't recall seeing any.

9 Q (By Mr. Waters) You're not saying there wasn't;
10 you're saying you don't recall seeing any?

11 MS. KUGLER: Same objection.

12 A It's a big plant. I don't recall seeing any.
13 And I've been through a lot of plant since then
14 to where I wouldn't want to confusion the two.

15 Q (By Mr. Waters) All right. Fair enough. Did you
16 ever discuss with Mr. Hueber the fact that he
17 felt asbestos to be a problem area, but from your
18 perspective it was a low priority?

19 A Not in that context, no.

20 MR. WATERS: All right. Thanks. No
21 further questions.

22 MR. ERWIN: Are we done? That's it.

23 THE VIDEOGRAPHER: The deposition is
24 concluded at 1:36 p.m.

25

1 THE STATE OF TEXAS :

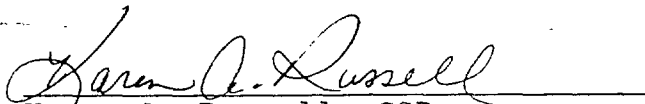
2 COUNTY OF HARRIS :

3
4 I, Karen A. Russell, a Certified Shorthand
5 Reporter for the State of Texas, do hereby certify
6 that this deposition transcript is a true record of
7 the testimony given by the witness named herein,
8 after said witness was duly sworn by me.

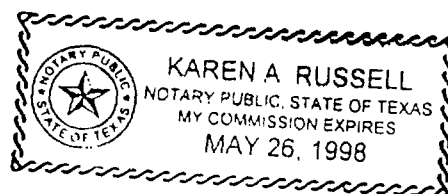
9 I further certify that I am neither attorney nor
10 counsel for, related to, nor employed by any of the
11 parties to the action in which this testimony was
12 taken. Further, I am not a relative or employee of
13 any attorney of record in this cause, nor do I have a
14 financial interest in the action.

15 Further certification requirements pursuant to
16 the Rules will be certified to in the supplemental
17 certificate after they have occurred.

18 Certified to on this, the _____ day of _____,
19 1997.

20
21 
22 Karen A. Russell, CSR
23 Certification No. 4241
24 Expiration Date: 12-31-97
25 Notary Expiration Date: 5-26-98

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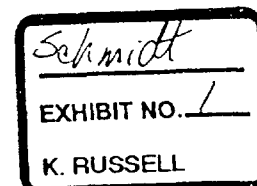


LAWYER'S NOTES

[illegible]



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Details for the inspections listed below may be obtained in two ways. The first method is simply following the inspection activity number link. The second method is marking the check boxes for selected inspections and pressing the *Get Detail* button. Information relevant to the selected cases will be returned and may then be browsed or printed. For information on the data elements displayed below, see definitions.

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Establishment	Date Range		RID	State	Limits	Include Exclude
armco	1972-07-01	1979-12-31	All	All	300/2500	

Get Detail		+	All	Reset	Found 242 -- Processed 242 -- Selected 242 -- Displayed 242						
	Activity Nr	In Date	Report ID	St	Tp	SIC	Vio	Establishment Name			
☐	1	<u>214690885</u>	1979-12-07	0522000	OH	G	<u>3312</u>		Armco Steel Corp		
☐	2	<u>017361825</u>	1979-11-30	0728500	MO	A	<u>3312</u>		Armco Steel Corp		
☐	3	<u>214619637</u>	1979-11-29	0522000	OH	H	<u>1623</u>	2	Armco Inc Metal Products Divis		
☐	4	<u>017369828</u>	1979-11-15	0728500	MO	B	<u>3312</u>		Armco Steel		
☐	5	<u>017361775</u>	1979-11-14	0728500	MO	B	<u>3312</u>		Armco Steel Corp		
☐	6	<u>013967518</u>	1979-11-06	0420600	FL	H	<u>3498</u>	3	Armco Steel Corp		
☐	7	<u>214600405</u>	1979-11-01	0522000	OH	B	<u>3312</u>		Armco Inc		
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☐	9	<u>016814204</u>	1979-10-16	0626600	TX	A	<u>3312</u>	4	Armco Steel Corporation-Hou		
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☐	11	<u>014560155</u>	1979-10-04	0522000	OH	G	<u>3312</u>	1	Armco Steel Corp		
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☐	32	<u>016766834</u>	1978-12-01	0626600	TX	H	<u>3312</u>		Armco Steel Corp
☐	33	<u>013996731</u>	1978-11-28	0420600	FL	B	<u>3317</u>		Armco Steel Corp
☐	34	<u>017041500</u>	1978-11-20	0637200	OK	A	<u>3312</u>	4	Armco Inc
☐	35	<u>012801924</u>	1978-11-08	0317500	PA	F	<u>3317</u>		Armco Inc
☐	36	<u>017360744</u>	1978-10-12	0728500	MO	A	<u>3312</u>		Armco Steel Corp
☐	37	<u>016469140</u>	1978-10-03	0626300	TX	F	<u>3499</u>		Armco Inc
☐	38	<u>016421976</u>	1978-09-28	0626300	TX	H	<u>3499</u>		Armco Inc
☐	39	<u>012801783</u>	1978-09-06	0317500	PA	A	<u>3317</u>	2	Armco Inc
☐	40	<u>016416034</u>	1978-08-21	0626300	TX	H	<u>3499</u>	7	Armco Inc
☐	41	<u>013886221</u>	1978-08-14	0436200	AL	B	<u>3089</u>		Corban Armco Steel Corp
☐	42	<u>016812885</u>	1978-07-06	0626600	TX	F	<u>3312</u>		Armco Steel Corp
☐	43	<u>013519913</u>	1978-06-14	0419400	MS	H	<u>1623</u>	5	Armco Steel Corporation-Met
☐	44	<u>013804521</u>	1978-05-17	0436200	AL	B	<u>3089</u>	1	Corban Armco Steel Corp
☐	45	<u>214573032</u>	1978-05-12	0522000	OH	H	<u>3312</u>		Armco Steel Corp Middletown
☐	46	<u>017113101</u>	1978-04-28	0637400	TX	H	<u>3448</u>	3	Armco Steel Corp
☐	47	<u>014082929</u>	1978-04-25	0420600	FL	B	<u>3317</u>	2	Armco Steel Corp Advanced Mate
☐	48	<u>012844791</u>	1978-04-18	0317500	PA	B	<u>3312</u>		Armco Steel Corp
☐	49	<u>013800529</u>	1978-03-30	0436200	AL	H	<u>3089</u>		Corban Armco Steel Corp
☐	50	<u>017318312</u>	1978-03-28	0728500	MO	B	<u>3490</u>		Armco Steel Corp
☐	51	<u>010642445</u>	1978-03-23	0112600	MA	H	<u>1791</u>	3	Armco Steel Corp
☐	52	<u>010642437</u>	1978-03-23	0112600	MA	H	<u>1541</u>		Armco Systems Contracting-Div
☐	53	<u>016815334</u>	1978-03-08	0626600	TX	B	<u>3312</u>	3	Armco Steel Corp
☐	54	<u>014101430</u>	1978-02-09	0420600	FL	F	<u>2679</u>		Cor Ban Industries Inc-Armco
☐	55	<u>017297268</u>	1978-01-24	0728500	MO	B	<u>3490</u>		Armco Steel Corp
☐	56	<u>012951240</u>	1978-01-16	0317500	PA	F	<u>3442</u>		Armcor Industries Inc
☐	57	<u>014153381</u>	1978-01-09	0436300	GA	H	<u>1623</u>		Armco Steel Corp
☐	58	<u>014118954</u>	1978-01-09	0436300	GA	H	<u>1623</u>	5	Armco Steel Corp
☐	59	<u>214599763</u>	1977-12-14	0522000	OH	F	<u>3312</u>		Armco Steel Corp Middletown
☐	60	<u>014268056</u>	1977-11-09	0436400	GA	H	<u>1791</u>	1	Armco Steel Co Inc
☐	61	<u>012776852</u>	1977-10-12	0317500	PA	A	<u>1791</u>	1	Armco Steel Erection

☐	62	<u>017297045</u>	1977-08-31	0728500	MO	F	<u>3312</u>		Armco Steel Corp
☐	63	<u>016828956</u>	1977-08-30	0626600	TX	B	<u>3312</u>	1	Armco Steel Corp
☐	64	<u>016314965</u>	1977-08-25	0636800	LA	H	<u>5051</u>		Armco Steel Corp Union
☐	65	<u>014101232</u>	1977-08-24	0420600	FL	B	<u>2679</u>	4	Cor Ban Industries Inc-Armco
☐	66	<u>016842643</u>	1977-08-17	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	67	<u>017296989</u>	1977-08-04	0728500	MO	F	<u>3490</u>		Armco Steel Corp Union Wire Ro
☐	68	<u>012950663</u>	1977-07-11	0317500	PA	H	<u>3442</u>	10	Armcor Industries Inc
☐	69	<u>012924734</u>	1977-06-15	0317500	PA	B	<u>3312</u>		Armco Steel Corp
☐	70	<u>012910139</u>	1977-06-09	0317500	PA	F	<u>3312</u>		Armco Steel Corp
☐	71	<u>016785180</u>	1977-06-03	0626600	TX	B	<u>3312</u>		Armco Steel Corp-Houston Works
☐	72	<u>017012105</u>	1977-05-25	0637200	OK	B	<u>3312</u>	1	Armco Steel Corp Send S
☐	73	<u>014259113</u>	1977-05-10	0436400	GA	H	<u>1791</u>		Armco Steel Corp
☐	74	<u>011981339</u>	1977-05-04	0215800	NY	F	<u>1791</u>		Armco Steel Corp Metal
☐	75	<u>011981081</u>	1977-04-18	0215800	NY	A	<u>1791</u>	2	Armco Steel Corp Metal
☐	76	<u>017009689</u>	1977-03-24	06372)	OK	F	<u>3312</u>		Armco Steel Corp
☐	77	<u>012924510</u>	1977-03-18	0317500	PA	H	<u>3312</u>	7	Armco Steel Corp
☐	78	<u>017009655</u>	1977-03-14	0637200	OK	F	<u>3312</u>		Armco Steel Corp Sand S
☐	79	<u>016819690</u>	1977-03-03	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	80	<u>013796255</u>	1977-03-01	0419000	KY	F	<u>3321</u>		Armco Steel Corp
☐	81	<u>016793721</u>	1977-02-24	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	82	<u>017058959</u>	1977-02-18	0637200	OK	B	<u>3312</u>	2	Armco Steel Corporation-San
☐	83	<u>217447739</u>	1977-01-12	0728500	MO	B	<u>3312</u>		Armco Steel Corp
☐	84	<u>014523740</u>	1977-01-06	0522000	OH	B	<u>3312</u>	2	Armco Steel Corp Middletown
☐	85	<u>014523732</u>	1977-01-05	0522000	OH	B	<u>1541</u>	1	Armco Steel Corp Metal
☐	86	<u>016793663</u>	1977-01-03	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	87	<u>016793309</u>	1976-12-03	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	88	<u>014135560</u>	1976-11-10	0436300	GA	F	<u>1791</u>		Armco Steel Co
☐	89	<u>016738569</u>	1976-11-04	0626600	TX	H	<u>3444</u>	3	Aramco Inc
☐	90	<u>217447655</u>	1976-11-03	0728500	MO	F	<u>3312</u>		Armco Steel Corp
☐	91	<u>013843024</u>	1976-10-27	0436200	AL	A	<u>3089</u>		Armco Steel Corp
☐	92	<u>014135537</u>	1976-10-14	0436300	GA	B	<u>1791</u>	1	Armco Steel Co
☐	93	<u>017293614</u>	1976-10-08	0728900	NE	A	<u>1623</u>	1	Armco Steel Corp Metal
☐	94	<u>215363821</u>	1976-10-08	0523100	IN	B	<u>1623</u>	12	Armco Steel Corp Metal
☐	95	<u>013867452</u>	1976-09-13	0436200	AL	H	<u>1791</u>		Armco Steel Corp
☐	96	<u>017072505</u>	1976-09-13	0637200	OK	B	<u>3312</u>	1	Armco Steel Corp Sand S
☐	97	<u>217447622</u>	1976-09-02	0728500	MO	F	<u>3312</u>		Armco Steel Corp
☐	98	<u>013727136</u>	1976-08-17	0419700	FL	H	<u>3444</u>		Armco Steel Corp Metal Product
☐	99	<u>014011746</u>	1976-08-16	0420600	FL	H	<u>1771</u>	1	Armco Steel Corp

☐	100	015550171	1976-07-23	0523400	WI	H	1791	5	Armco Steel Corp
☐	101	014100796	1976-07-22	0420600	FL	H	3317		Armco Steel Corp
☐	102	214616906	1976-07-21	0522000	OH	B	3312	10	Armco Steel Corp Middletown
☐	103	016561227	1976-07-13	0626300	TX	F	3499		National Supply Co Div Armco S
☐	104	217462134	1976-06-21	0728500	MO	B	3312	26	Armco Steel Corp
☐	105	217447580	1976-06-18	0728500	MO	B	3312	56	Armco Steel Corp
☐	106	016499261	1976-06-16	0626300	TX	F	3499		National Supply Co Div Armco S
☐	107	214642969	1976-06-10	0522000	OH	B	3312		Armco Steel Corp Middletown
☐	108	014570899	1976-06-09	0522000	OH	H	1799	3	Armco Erection Central
☐	109	214616823	1976-05-20	0522000	OH	B	3312	3	Armco Steel Corp
☐	110	016819096	1976-05-18	0626600	TX	A	3312	4	Armco Steel Corp
☐	111	015981848	1976-05-06	0524700	OH	H	1791	3	Armco-Steel Corp
☐	112	016561169	1976-05-05	0626300	TX	H	3499	38	National Supply Co Div Armco S
☐	113	017299439	1976-05-04	0728500	MO	A	3490		Armco Steel Corp
☐	114	012552071	1976-04-21	0316700	PA	B	3021	1	Armco Steel Corporation-Met
☐	115	016737967	1976-04-20	0626600	TX	B	3312	3	Armco Steel Corp
☐	116	013139357	1976-04-08	0418100	GA	H	1623		Armco Steel Corp Const
☐	117	016868234	1976-04-06	0626600	TX	B	3312	1	Armco Steel Corp
☐	118	214582496	1976-03-31	0522000	OH	B	3312		Armco Steel Corp Middletown
☐	119	016890105	1976-03-24	0627700	OK	H	3444	11	Armco Steel Corp Metal
☐	120	013610159	1976-03-19	0419700	FL	H	1623	1	Armco Steel Corp Metal
☐	121	214645863	1976-03-11	0522000	OH	A	3312	4	Armco Steel Corp
☐	122	014285001	1976-02-23	0436400	GA	H	1520		Armco Steel Corp Metal Product
☐	123	016513814	1976-02-19	0626300	TX	B	3499		National Supply Co Div Armco S
☐	124	016749178	1976-02-10	0626600	TX	B	3312	2	Armco Steel Corp
☐	125	214764045	1976-01-26	0536600	IL	H	1520	1	Armco Metal Products Co
☐	126	012311056	1976-01-06	0316400	WV	H	4520	7	Aeromech Inc
☐	127	017018763	1975-12-09	0637200	OK	B	3312		Armco Steel Corp
☐	128	017358839	1975-12-04	0728500	MO	H	1520		Armco Steel Corp Metal Product
☐	129	015659337	1975-11-20	0524500	IL	H	3021	5	Armco Steel Corp
☐	130	016747917	1975-11-06	0626600	TX	B	3312		Armco Steel Corp
☐	131	017261165	1975-11-06	0728900	MO	H	4491		Armco Steel
☐	132	214781734	1975-10-30	0522300	OH	H	1799		Armco Steel Metal Products Div
☐	133	214616443	1975-10-28	0522000	OH	B	3312		Armco Steel Corp Middletown
☐	134	016794133	1975-10-23	0626600	TX	F	1623		Armco Steel Corp Metal Product
☐	135	016980922	1975-10-16	0627400	TX	H	3533	3	Armco National Supply Co Odess
☐	136	012842613	1975-09-23	0317500	PA	H	3312	7	Armco Steel Corp Butler
☐	137	214768947	1975-09-11	0536600	IL	H	3949	10	Armac Enterprises Inc

☐	138	<u>016799462</u>	1975-09-09	0626600	TX	H	<u>3312</u>	1	Armco Steel Corp
☐	139	<u>012711875</u>	1975-09-09	0317000	PA	B	<u>1623</u>		Armco Steel Corp
☐	140	<u>010594059</u>	1975-08-25	0112600	MA	H	<u>3316</u>	10	Armco Steel Corp
☐	141	<u>214616377</u>	1975-08-15	0522000	OH	B	<u>3312</u>	3	Armco Steel Corp Middletown
☐	142	<u>017058298</u>	1975-08-15	0637200	OK	B	<u>3312</u>		Armco Steel Corp
☐	143	<u>016836272</u>	1975-08-05	0626600	TX	F	<u>1623</u>		Armco Steel Corp Metal
☐	144	<u>013205513</u>	1975-07-22	0418300	AL	H	<u>1623</u>	3	Armco Steel Corp
☐	145	<u>016799249</u>	1975-07-22	0626600	TX	H	<u>3312</u>		Armco Steel Corp
☐	146	<u>016793960</u>	1975-07-18	0626600	TX	H	<u>1623</u>	1	Armco Steel Corp Metal
☐	147	<u>016836181</u>	1975-07-17	0626600	TX	H	<u>1623</u>	10	Armco Steel Corporation-Met
☐	148	<u>217747716</u>	1975-07-01	0830100	MT	F	<u>5082</u>		Armco Steel Corp Nation
☐	149	<u>016806861</u>	1975-06-30	0626600	TX	B	<u>3312</u>	1	Armco Steel Corporation-Hou
☐	150	<u>016806689</u>	1975-05-28	0626600	TX	B	<u>3312</u>	1	Armco Steel Corporation-Hou
☐	151	<u>017259953</u>	1975-05-21	0728900	MO	H	<u>4491</u>		Armco Steel Corp
☐	152	<u>016771123</u>	1975-05-08	0626600	TX	A	<u>3312</u>		Armco Steel Corp
☐	153	<u>215033333</u>	1975-05-08	0522500	OH	H	<u>1794</u>	4	Armco Steel Corp Metal Product
☐	154	<u>017029620</u>	1975-05-06	0637200	OK	F	<u>3312</u>		Armco Steel Corp
☐	155	<u>016835787</u>	1975-04-03	0626600	TX	H	<u>1791</u>		Armco Steel Corp Metal Product
☐	156	<u>012430989</u>	1975-03-27	0335900	VA	H	<u>1623</u>	2	Armco Steel Corp
☐	157	<u>016513095</u>	1975-03-19	0626300	TX	H	<u>2299</u>	6	Airmec Corp
☐	158	<u>017213042</u>	1975-03-13	0737500	NE	H	<u>1520</u>	1	Armco Steel Corp
☐	159	<u>016357279</u>	1975-03-13	0636800	LA	H	<u>3494</u>	8	Armco Steel Corp Nation
☐	160	<u>016791493</u>	1975-03-10	0626600	TX	H	<u>3317</u>		Armco Steel Corp Advanced
☐	161	<u>012898300</u>	1975-03-07	0317500	PA	H	<u>3312</u>	16	Armco Steel Corp
☐	162	<u>013572979</u>	1975-03-05	0419400	MS	H	<u>1794</u>	4	Armco Steel Inc
☐	163	<u>218321131</u>	1975-02-26	1032500	ID	H	<u>3444</u>		Armco Steel Corp Metal Product
☐	164	<u>017212929</u>	1975-02-20	0737500	NE	H	<u>1520</u>		Armco Steel Corp
☐	165	<u>214616005</u>	1975-01-30	0522000	OH	B	<u>3312</u>	6	Armco Steel Corp Middletown
☐	166	<u>014569487</u>	1975-01-21	0522000	OH	H	<u>1520</u>	4	Armco Systems Contracting
☐	167	<u>217776103</u>	1975-01-16	0830100	MT	H	<u>5082</u>	9	Armco Steel Corp Nation
☐	168	<u>017060203</u>	1975-01-09	0637200	OK	A	<u>3312</u>		Armco Steel Corp
☐	169	<u>012377032</u>	1975-01-07	0335700	DE	H	<u>1741</u>	1	Armco Construction Co
☐	170	<u>016426595</u>	1974-12-27	0626300	TX	F	<u>3533</u>		National Supply Co Div Armco S
☐	171	<u>214615411</u>	1974-11-18	0522000	OH	B	<u>3312</u>	27	Armco Steel Corp Middletown
☐	172	<u>215062191</u>	1974-11-13	0522500	OH	H	<u>3449</u>	1	Armco Steel Corp Metal Product
☐	173	<u>012934006</u>	1974-11-06	0317500	PA	B	<u>3324</u>		Armco Steel Corp Butler
☐	174	<u>014021786</u>	1974-11-05	0420600	FL	B	<u>3317</u>	6	Armco Steel Corp
☐	175	<u>016805566</u>	1974-10-02	0626600	TX	B	<u>3312</u>	6	Armco Steel Corp

☐	176	<u>013032123</u>	1974-09-26	0418100	GA	H	<u>3317</u>	5	Armco Steel Corp Metal
☐	177	<u>016770174</u>	1974-09-20	0626600	TX	H	<u>1623</u>		Armco Metal Products Div
☐	178	<u>013839048</u>	1974-09-20	0436200	AL	H	<u>3021</u>	4	Armco Steel Corp
☐	179	<u>214852063</u>	1974-09-05	0522300	OH	H	<u>1799</u>		Armco Steel Co Metal
☐	180	<u>017217597</u>	1974-08-30	0737500	NE	F	<u>1791</u>	1	Armco Steel Corp
☐	181	<u>012859609</u>	1974-08-27	0317500	PA	H	<u>3498</u>	4	Armco Steel Metal Products Div
☐	182	<u>016805418</u>	1974-08-22	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	183	<u>013137443</u>	1974-08-15	0418100	GA	H	<u>1623</u>	1	Armco Steel Corp
☐	184	<u>016978405</u>	1974-08-01	0627400	TX	H	<u>5084</u>	2	Armco Steel Corp Machin
☐	185	<u>017217464</u>	1974-07-31	0737500	NE	H	<u>1791</u>	2	Armco Steel Corp
☐	186	<u>012905089</u>	1974-06-25	0317500	PA	B	<u>3312</u>		Armco Steel Corp
☐	187	<u>012948477</u>	1974-06-25	0317500	PA	B	<u>3317</u>	4	Armco Steel Corp
☐	188	<u>217459908</u>	1974-06-12	0728500	MO	B	<u>3490</u>	1	Armco Steel Corp Kansas
☐	189	<u>011740164</u>	1974-06-10	0215000	NY	H	<u>2542</u>	6	Armico Mfg Corp
☐	190	<u>215065475</u>	1974-06-07	0522500	OH	F	<u>3317</u>		Armco Steel Corp
☐	191	<u>215051152</u>	1974-05-17	0522500	OH	H	<u>3317</u>		Armco Steel Corp
☐	192	<u>012357133</u>	1974-05-08	0316400	WV	F	<u>1623</u>		Armco Steel Corp Metal
☐	193	<u>016458663</u>	1974-05-06	0626300	TX	F	<u>1791</u>		Armco Steel Corp
☐	194	<u>013668454</u>	1974-05-02	0419700	FL	B	<u>3312</u>	8	Armco Steel Corp
☐	195	<u>016458085</u>	1974-04-30	0626300	TX	H	<u>1791</u>	3	Armco Steel Corp
☐	196	<u>012357042</u>	1974-04-19	0316400	WV	H	<u>1623</u>	5	Armco Steel Corp Metal
☐	197	<u>017044058</u>	1974-04-04	0637200	OK	B	<u>3312</u>		Armco Steel Corp
☐	198	<u>215064601</u>	1974-03-26	0522500	OH	H	<u>3317</u>	3	Armco Steel Corp
☐	199	<u>017257221</u>	1974-03-20	0728900	NE	H	<u>3317</u>	3	Armco Steel Corp
☐	200	<u>214609356</u>	1974-03-18	0522000	OH	H	<u>3312</u>	4	Armco Steel Corp Middletown
☐	201	<u>014527253</u>	1974-03-18	0522000	OH	H	<u>3312</u>	91	Armco Steel Corp Middletown
☐	202	<u>016769499</u>	1974-03-08	0626600	TX	F	<u>1623</u>		Armco Metal Products Div
☐	203	<u>016769432</u>	1974-02-26	0626600	TX	H	<u>1623</u>		Armco Metal Products Div
☐	204	<u>012943874</u>	1974-01-31	0317500	PA	B	<u>3312</u>		Armco Steel Corp Butler
☐	205	<u>016789885</u>	1974-01-24	0626600	TX	B	<u>3312</u>		Armco Steel Corp
☐	206	<u>013794102</u>	1974-01-24	0419000	KY	F	<u>3312</u>	1	Armco Steel Corp
☐	207	<u>016455180</u>	1974-01-24	0626300	TX	F	<u>3449</u>		Armco Steel Corp Southwest Ste
☐	208	<u>016455024</u>	1974-01-09	0626300	TX	H	<u>3449</u>	3	Armco Steel Corp Southwest Ste
☐	209	<u>217379189</u>	1973-12-14	0728500	KS	H	<u>3449</u>	5	Armco Steel Corp
☐	210	<u>016325433</u>	1973-11-27	0636800	LA	H	<u>3443</u>	10	Armco Steel Corp Metal
☐	211	<u>012896718</u>	1973-11-15	0317500	PA	H	<u>3021</u>		Armco Steel Corp Metal
☐	212	<u>015438682</u>	1973-11-12	0523400	WI	H	<u>3444</u>	1	Armco Steel Corp Metal
☐	213	<u>016454571</u>	1973-10-26	0626300	TX	F	<u>1623</u>		Armco Steel Corp Steel

☐	214	<u>015503717</u>	1973-10-25	0523400	WI	H	<u>3317</u>	6	Armco Steel Corp Metal Product
☐	215	<u>017264136</u>	1973-10-25	0728900	NE	F	<u>4490</u>		Armco Steel Corp
☐	216	<u>217764844</u>	1973-10-25	0830100	MT	H	<u>5050</u>	7	Armco Steel Corp Metal
☐	217	<u>015607757</u>	1973-10-25	0523700	MN	H	<u>3317</u>	2	Armco Steel Corp
☐	218	<u>013101407</u>	1973-10-23	0418100	GA	F	<u>1623</u>		Armco Steel Corp Metal
☐	219	<u>013101399</u>	1973-10-19	0418100	GA	H	<u>1623</u>	3	Armco Steel Corp Metal
☐	220	<u>016454233</u>	1973-10-10	0626300	TX	H	<u>1623</u>	4	Armco Steel Corp Steel
☐	221	<u>013793484</u>	1973-09-05	0419000	KY	F	<u>3317</u>	1	Armco Steel Corp Metal Product
☐	222	<u>016802639</u>	1973-08-28	0626600	TX	B	<u>3312</u>	2	Armco Steel Corp
☐	223	<u>017037813</u>	1973-08-09	0637200	AR	H	<u>1623</u>	3	Armco Steel Corp
☐	224	<u>215364506</u>	1973-08-07	0523100	IN	F	<u>3490</u>		Bathey Mfg Armco Plant
☐	225	<u>017263161</u>	1973-08-02	0728900	NE	H	<u>4490</u>		Armco Steel Corp
☐	226	<u>218267383</u>	1973-07-17	0931800	CA	H	<u>3441</u>		Armco Steel Corp
☐	227	<u>017247016</u>	1973-07-13	0728900	NE	H	<u>1623</u>		Armco Steel Inc
☐	228	<u>013792288</u>	1973-07-10	0419000	KY	H	<u>3317</u>	2	Armco Steel Corp Metal Product
☐	229	<u>215344342</u>	1973-06-15	0523100	IN	B	<u>3490</u>	11	Bathey Mfg Armco Plant
☐	230	<u>016745747</u>	1973-06-05	0626600	TX	B	<u>3312</u>	1	Armco Steel Corp
☐	231	<u>214585630</u>	1973-05-17	0522000	OH	B	<u>3316</u>	3	Armco Steel Corp
☐	232	<u>016755589</u>	1973-04-11	0626600	TX	B	<u>3312</u>	4	Armco Steel Corp
☐	233	<u>214646812</u>	1972-12-21	0522000	OH	B	<u>3312</u>		Armco Steel Corp
☐	234	<u>217458710</u>	1972-12-14	0728500	MO	F	<u>3315</u>	1	Armco Steel Corp
☐	235	<u>214646770</u>	1972-12-05	0522000	OH	A	<u>3312</u>		Armco Steel Corp
☐	236	<u>017069071</u>	1972-12-05	0637200	OK	B	<u>3312</u>	8	Armco Steel Corp
☐	237	<u>217421825</u>	1972-11-02	0728500	MO	A	<u>3315</u>		Armco Steel Corp
☐	238	<u>217919497</u>	1972-09-14	0830700	UT	H	<u>3444</u>		Armco Steel Corp
☐	239	<u>214768269</u>	1972-08-04	0536600	IL	A	<u>2430</u>	13	Armco Enterprises Inc
☐	240	<u>214768251</u>	1972-08-03	0536600	IL	H	<u>2430</u>	39	Armco Enterprises Inc
☐	241	<u>013779327</u>	1972-07-18	0419000	KY	H	<u>3312</u>	1	Armco Steel Corp
☐	242	<u>215059296</u>	1972-07-13	0522500	OH	H	<u>3312</u>	12	Armco Steel Corp

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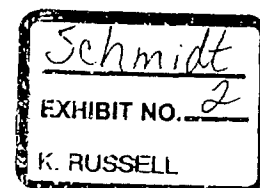
Establishment Search Inspection Detail

Definitions

Inspection 217462134 - Armco Steel Corp

Inspection Information	
Nr: 217462134 Report ID: 0728500 Open: 1976-06-21	
Armco Steel Corp	Nr Employees: 4200
7000 Roberts Road	Nr Controlled: 4200
Kansas City, MO 64123	Union Status: Union
SIC: 3312/Blast Furnaces Steel Mills	LWDI Rate:
Inspection Type: Complaint	Employees Covered: 4200
Scope: Complete	Advance Notice:
Ownership:	Hours Spent:
Safety/Health: Health	Close Conference: 1976-07-13
	Close Case: 1982-09-17

	Violation Summary					
	Serious	Willful	Repeat	Other	Unclass	Total
Nr Violations				26		26
Penalty Amount				400.00		400.00
FTA Amount						

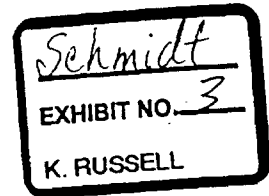


Violation Items										
	ID	Type	Standard	Issuance	Abate	CurrS	InitS	FtaS	Contest	Evt
1	<u>01001</u>	Other	19100022	1976-07-21	1978-07-25					P
2	<u>01003</u>	Other	19100094 D09 VIII	1976-07-21	1976-08-23					
3	<u>01004</u>	Other	19100094 D10	1976-07-21	1976-08-23	30.00	30.00			
4	<u>01005</u>	Other	19100095	1976-07-21	1982-07-14				1979-08-15	P
5	<u>01006</u>	Other	19100096 D01	1976-07-21	1976-07-24	30.00	30.00		1979-08-15	
6	<u>01008</u>	Other	19100096 E02	1976-07-21	1976-08-23				1979-08-15	
7	<u>01009</u>	Other	19100096 E03 II	1976-07-21	1976-09-06	35.00	35.00		1979-08-15	
8	<u>01010</u>	Other	19100134 B	1976-07-21	1976-09-04				1979-08-15	P
9	<u>01011</u>	Other	19100134 E01	1976-07-21	1976-08-23				1979-08-15	
10	<u>01012</u>	Other	19100134 E05	1976-07-21	1976-08-23				1979-08-15	
11	<u>01013</u>	Other	19100134 E05 I	1976-07-21	1976-08-05				1979-08-15	
12	<u>01014</u>	Other	19100134 F03	1976-07-21	1976-09-04				1979-08-15	P
13	<u>01015</u>	Other	19100141 B01 II	1976-07-21	1976-09-22	30.00	30.00		1979-08-15	P
14	<u>01016</u>	Other	19100141 B02 II	1976-07-21	1976-08-23				1979-08-15	
15	<u>01017</u>	Other	19100151 C	1976-07-21	1976-08-23	35.00	35.00		1979-08-15	
16	<u>01018</u>	Other	19100151 C	1976-07-21	1976-08-05				1979-08-15	
17	<u>01019</u>	Other	19100252 F02 II	1976-07-21	1976-09-06	30.00	30.00		1979-08-15	
18	<u>01020</u>	Other	19101001 F01	1976-07-21	1976-07-24	30.00	30.00		1979-08-15	
19	<u>01021A</u>	Other	19101001 F02 I	1976-07-21	1976-07-24	35.00	35.00		1979-08-15	
20	<u>01021B</u>	Other	19101001 F02 II	1976-07-21	1976-08-23				1979-08-15	
21	<u>01022</u>	Other	19101001 G02	1976-07-21	1976-08-05				1979-08-15	
22	<u>01023</u>	Other	19101001 H02	1976-07-21	1976-08-05				1979-08-15	
23	<u>01024</u>	Other	19101001 F01	1976-07-21	1976-09-22	35.00	35.00		1979-08-15	P
24	<u>02001</u>	Other	19100141 G02	1976-08-02	1976-03-05	30.00	30.00		1979-08-15	
25	<u>02002</u>	Other	19101000 A01	1976-08-02	1976-08-05	30.00	30.00		1979-08-15	
26	<u>02003</u>	Other	19101000 E01	1976-08-02	1977-02-02	50.00	50.00		1979-08-15	
27	<u>02004</u>	Other	19100022 A01	1976-08-16	1976-09-13				1979-08-15	

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The United States Department of Labor
Occupational Safety and Health Administration



Establishment Search Inspection Detail

Definitions

Inspection 214639197 - Armco Steel Corp

Inspection Information			
Nr: 214639197 Report ID: 0522000 Open: 1979-06-12			
Armco Steel Corp	Nr Employees: 6900		
Middletown Works	Nr Controlled: 6900		
Middletown, OH 45042	Union Status: Union		
SIC: 3312/Blast Furnaces Steel Mills	LWDI Rate:		
Inspection Type: Complaint	Employees Covered: 11		
Scope: Partial	Advance Notice:		
Ownership:	Hours Spent:		
Safety/Health: Health	Close Conference: 1979-06-13		
	Close Case: 1981-03-16		
Related Activity: Type	ID	Date	Safety Health
Complaint	321115453	1979-06-07	

	Violation Summary					
	Serious	Willful	Repeat	Other	Unclass	Total
Nr Violations	1			2		3
Penalty Amount	640.00					640.00
FTA Amount						

Violation Items								
ID	Type	Standard	Issuance	Abate	CurrS	InitS	FtaS	Contest Evt
1 01001	Serious	19101001 F01	1979-07-23	1979-07-26	640.00	640.00		
2 02001	Other	19100134 B11	1979-06-29	1979-07-02				
3 02002	Other	19101001 G01 I	1979-07-23	1979-07-26				

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