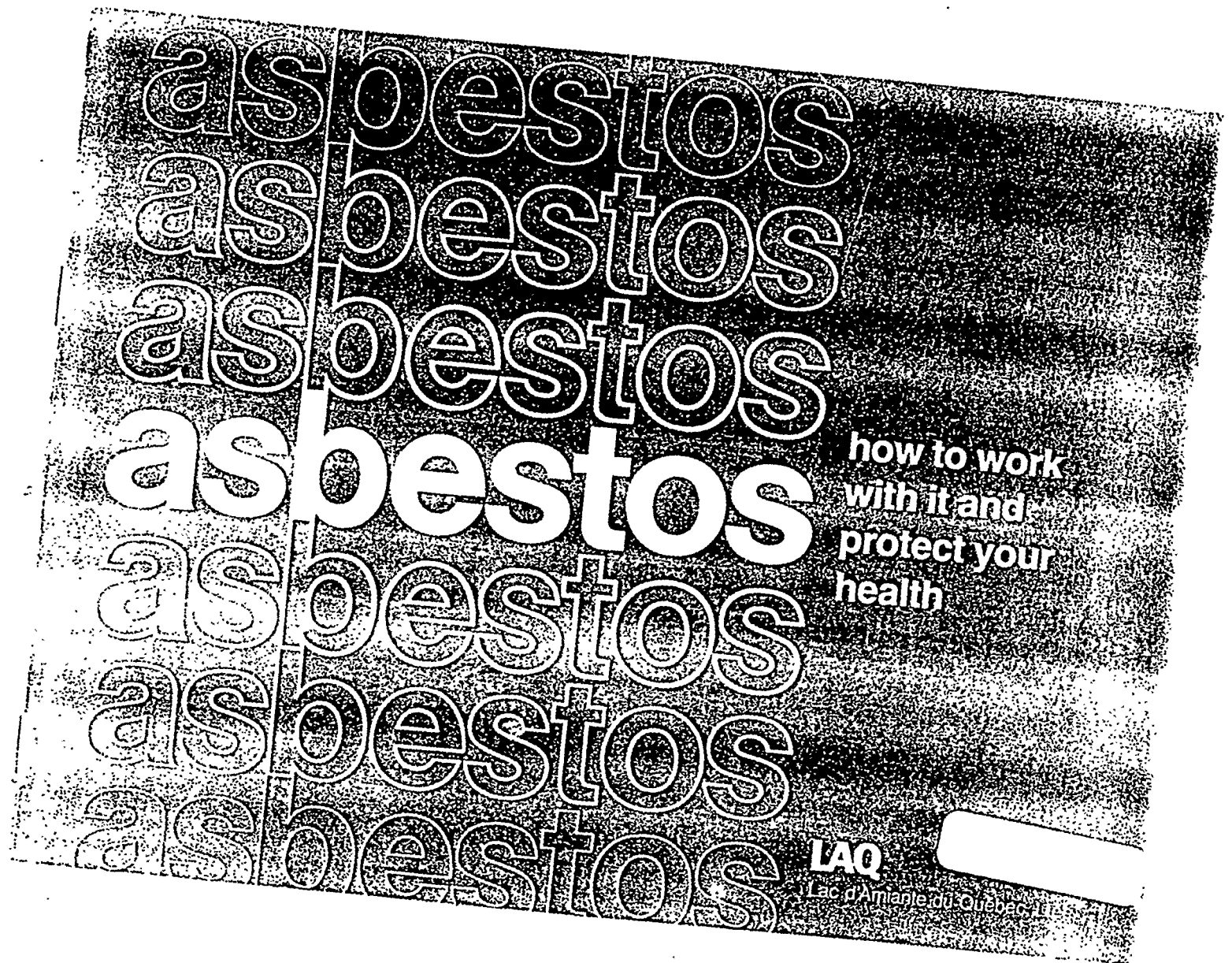


PLAINTIFF'S EXHIBIT

CAP-1844



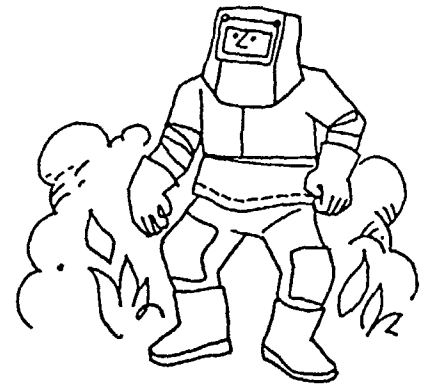
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Asbestos

Asbestos is a general term describing a family of fibrous minerals which are used in the manufacture of some 3,000 different products. LAQ mines and sells chrysotile asbestos fiber, the major type that accounts for 90% of the asbestos used. Many of these essential asbestos products such as brake linings, gaskets and coatings have no known practical substitutes. Asbestos products protect and save lives every day.

Much has been written about the hazards of asbestos fibers in the workplace. What follows is a frank discussion of these serious problems. Please keep in mind that while your employer may have the primary responsibility to protect his workers, your cooperation is essential.

Airborne asbestos fibers are present in all asbestos product manufacturing operations, mines and mills, and some product application processes. However, by properly controlling dust concentrations and meeting government regulations, the hazard to workers is minimized.

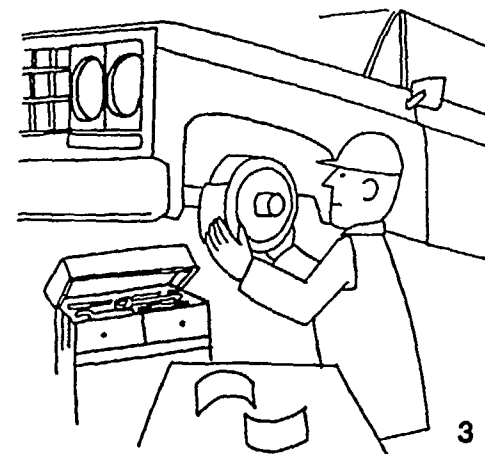
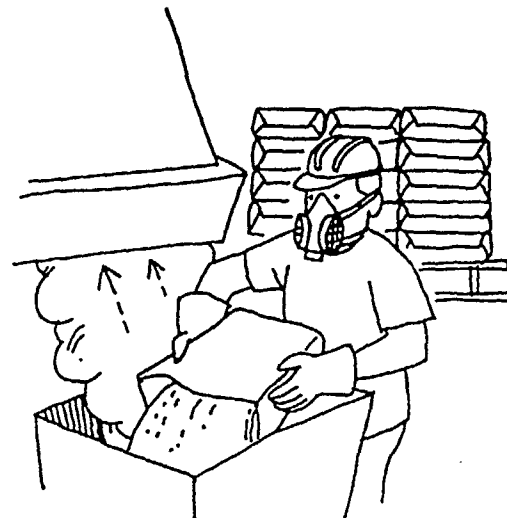


Asbestos in the Workplace

There are two major areas where the worker contacts asbestos. The first is in the primary manufacturing process where the bags are opened and the asbestos is mixed and processed. The second involves the application and use of these asbestos products. More than 90% of the asbestos products made in the United States will not produce hazardous dust levels because the fibers are "locked" in by cement, plastics or other binders. However, certain operations such as drilling, sawing and grinding, demolition and removal of old asbestos insulation and installing brake lining can release fiber into the air. Proper work practices, protective equipment and engineering controls can be used to prevent worker exposure to airborne asbestos dust concentrations above allowable government limits.

Health Hazards

Exposure to asbestos dust in the workplace over a period of years can increase the risk of developing certain diseases. The experts are not all in agreement on the level below which there is no risk. Available medical evidence indicates that your chances of contracting asbestos-related disease are minimized as asbestos concentrations in the workplace are reduced to approved levels. Several studies accept and recommend 5 fibers per cubic centimeter while others prefer



2 fibers per cc and reduction to 0.5 fibers has been proposed.
Current OSHA regulations are 2 fibers per cc.

In order to provide you with notice and warning of
asbestos health hazards, LAQ places a label on
each bag of asbestos fiber which it sells. The label reads as follows:

**DANGER—Contains Asbestos Fibers •
Avoid Creating Dust • Asbestosis, Lung Cancer**

There are four diseases associated with asbestos dust exposure. First is asbestosis which damages the lungs and may permanently impair breathing. In certain severe cases, it may be fatal. This disease appears in those who have been exposed to excessive concentrations of asbestos dust over a period of years.

Lung and gastrointestinal cancer (stomach, colon and rectum) have been shown to be associated with many years of exposure to excess concentrations of asbestos dust and can be fatal. However, studies carried out on workers in the asbestos industry in England and Canada have shown that as total exposure to airborne asbestos fiber was reduced, there was a corresponding reduction in the excess mortality observed.

The fourth disease is mesothelioma, a rare and incurable form of cancer of the lining of the chest or abdominal cavity. It may occur from elevated concentrations of asbestos and has been observed in individuals exposed to low and to no known concentration of asbestos fiber.

**and Other Fatal Diseases
May Be Caused By
Inhalation of Asbestos •
Smoking Greatly
Increases Lung
Cancer Risk**

Smoking

Here is where you can greatly reduce your chances of developing lung cancer. It has been established that cigarette smoking GREATLY increases the risk of developing lung cancer in asbestos workers. Further, the lung cancer risk for the asbestos worker in a well controlled environment who has never smoked appears to be no greater than the average person who does not smoke.

It is essential that asbestos workers who smoke, during work hours or at other times, take immediate action to STOP SMOKING. Asbestos workers who do not smoke should not start.

Also, if you or your family has a history of lung problems, you may be susceptible to asbestos health hazards. As a result, the regular lung examinations provided by your company are especially important. Be sure to take advantage of this service.

Protecting Your Health: Your Employer's Role

There are many things that you and your employer must do to protect your health as well as to assure compliance with government regulations. You will find your employer more than willing to do his part, including the following:

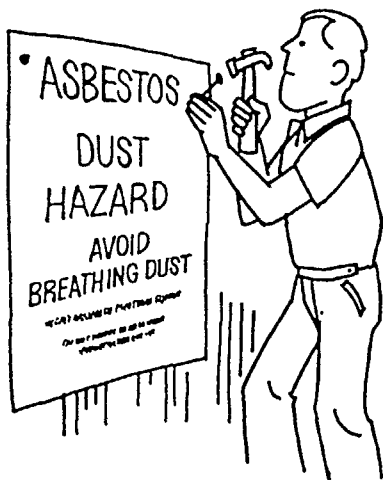
1. Inform workers of the potential hazards to their health from asbestos exposure by conducting health education and training programs.



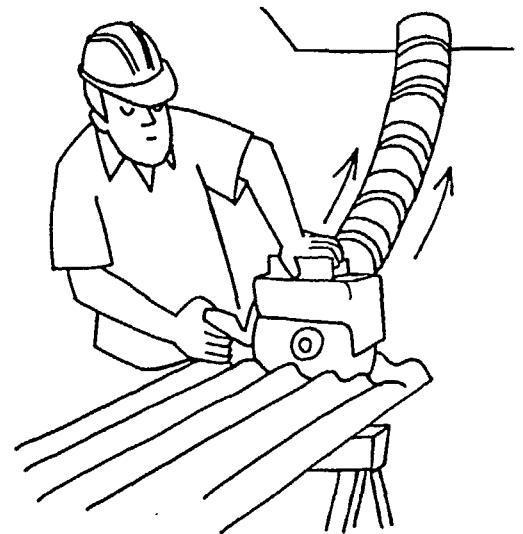
2. Measure asbestos dust concentrations by means of portable samplers worn by the workers.

3. Inform workers of the actions to be taken to reduce their exposure, if the exposure is higher than the government-set standard.

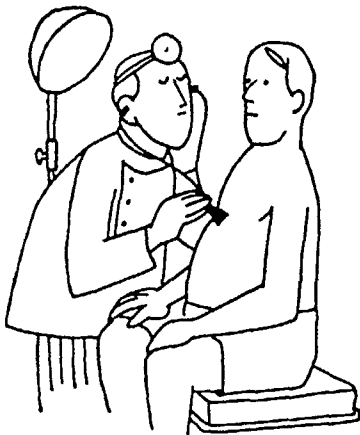
4. Prevent asbestos fibers from escaping and spreading by providing mechanical ventilation, isolating dusty operations, installing dust control systems, and fitting tools with exhaust ventilation, if feasible.



5. Post caution signs in work areas where airborne dust concentrations exceed the standard.



- 6.** Provide approved respirators for use when exposures to asbestos exceed the standard.



- 7.** Provide annual medical examinations for workers exposed to asbestos dust. These records must be kept for 20 years. At a worker's request, his own medical records must be made available to his family physician.



- 8.** Provide double lockers, and provide change rooms for use at locations where dust concentrations exceed the standard.

- 9.** Provide coveralls and other protective equipment.

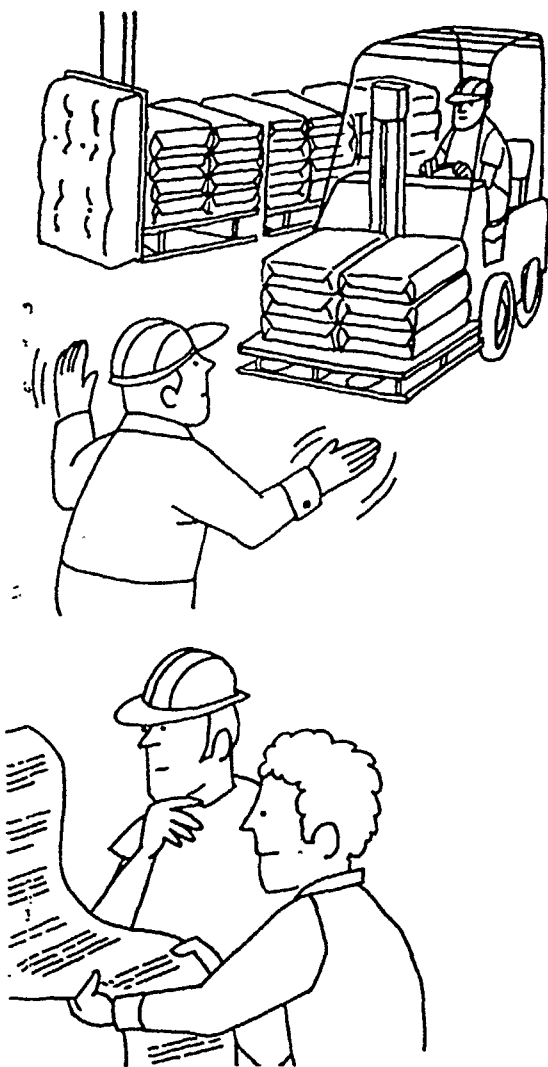
Protecting Your Health: What You Must Do

There are many things that you must do to keep a healthy workplace. Things that you as an individual can do to protect your own health and the health of fellow employees include:

1. **General Precautions.** Know and follow the following recommended work practices for handling asbestos fiber. In all stages of handling, packaging, transporting, unloading, storing, and in-plant moving, asbestos fiber bags should be handled carefully and in such a manner as to prevent damage to bags and the generation of dust.

Damaged bags should be immediately repaired, resealed or put into closed receptacles. Any spillage of asbestos fiber should be cleaned up immediately—either by vacuum equipment or, after thoroughly wetting, by sweeping—and should be deposited in suitable closed receptacles.





Consult and observe OSHA regulations governing asbestos in the workplace, EPA rules on discharge to the ambient air, and other local codes, rules or regulations controlling the handling and use of asbestos fiber.

- 2. Unloading.** Unitized loads should be lifted intact to and from holds of ships, and off and on land transport by forklift trucks or other modes of transportation. Hooks or other sharp instruments should not be used. Loose fiber accumulated during transit should be picked up by vacuum cleaner before unloading.
- 3. Storage.** For storage, fiber bags should be stacked and moved with care to avoid breakage; protected from puncture by moving vehicles; and, if possible, should be isolated from traffic in the warehouse and covered to prevent dust generation. To prevent deterioration of stored bags, the principle of first-in, first-out should be followed.
- 4. Handling.** Fully effective dust control systems should be operated at all stages of inplant handling where dust is created, such as in bag opening, fiber dumping and bag disposal operations. Loose fiber should be cleaned from work areas by vacuum cleaner,

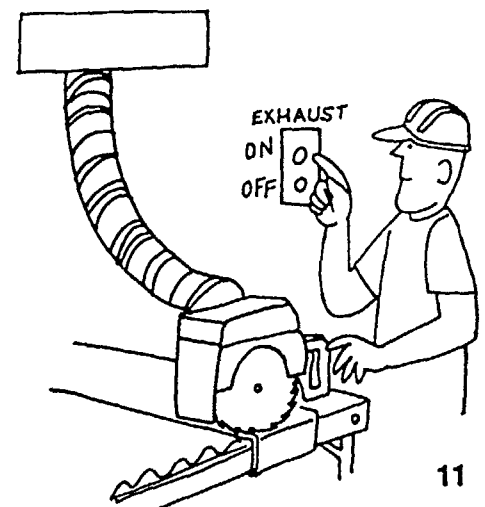


or after thoroughly wetting, by sweeping, and then deposited in properly labeled, sealed, impermeable bags.

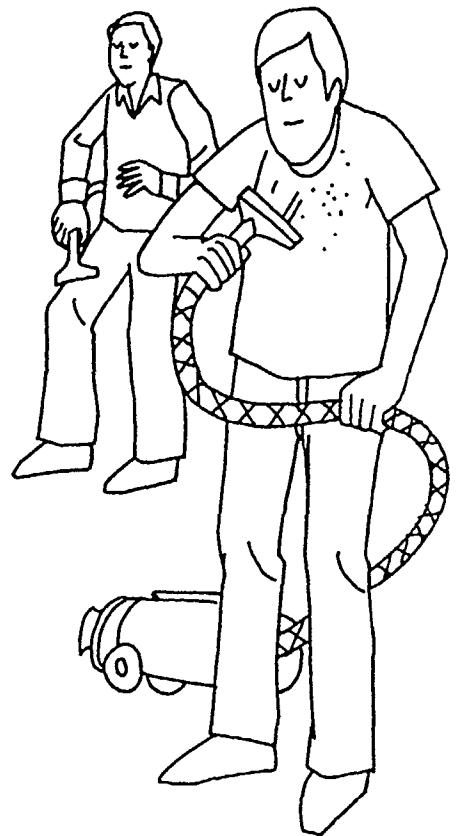
- 5. Protective Equipment.** Wearing of respiratory equipment approved for protection against asbestos dust should be required at all stages of asbestos fiber handling where quantities of dust are generated which cannot be kept within allowable limits by dust control equipment or other methods.
- 6. Transport.** Where the use of asbestos requires the transport of loose fiber, covers should be employed on any vehicles or containers used in order to prevent spilling and dust generation.
- 7. Waste Material.** Waste material, such as collected dust and empty fiber bags, should be collected and disposed of in properly labeled, closed, impermeable containers or sealed, impermeable bags. Safety practices outlined above in the **Handling** and **Protective Equipment** sections should be followed during these operations.

All dust from exhaust systems should be collected and safely disposed of, being careful not to release dust into the outside air. Particular attention should be paid to hygiene practices by employees whose job it is to dispose of collected dust from fabric filter dust collection and similar cleaning operations.

8. If you are not sure how to handle a material or do a job without creating dust, talk to your supervisor.
9. If you think that your employer may have overlooked a possible hazard, bring it to the attention of your supervisor.
10. Learn how to operate control equipment. Never by-pass ventilation and dust collection systems, but use and maintain them properly and regularly.



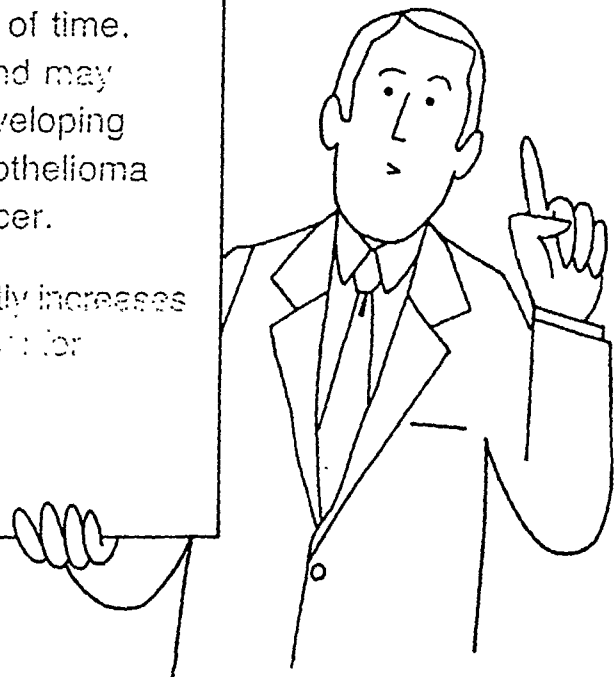
- 11.** Clean up at the end of work periods is important. Do **not** shake or blow the dust off your clothes. Use vacuum equipment to remove excess dust.
- 12.** Do not wear home any clothing that might be carrying asbestos dust, because you might expose your family to the fibers.
- 13.** Actively participate in asbestos health education programs provided by your employer. The more you know about asbestos health dangers and how to avoid exposing yourself to them, the quicker we can all achieve the goal of eliminating health hazards from working with asbestos.



Remember—

Asbestos fiber can be hazardous to your health and excessive dust exposure, over a period of time, can cause asbestosis and may increase your risk of developing cancer of the lung, mesothelioma and gastrointestinal cancer.

Smoking at any time greatly increases the possibility of lung cancer for asbestos workers.

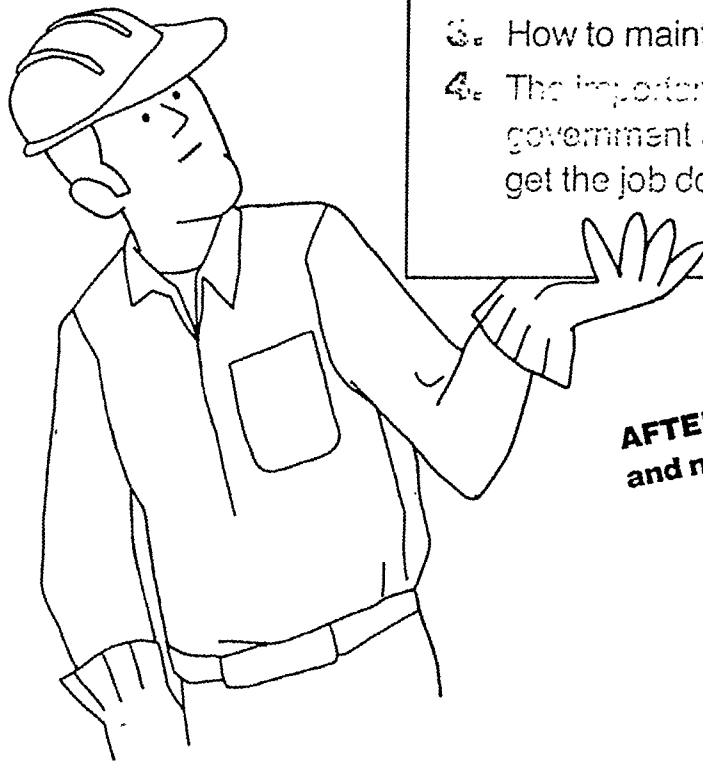


Management's Job—



The hazards of working with asbestos can be reduced if everyone does his part. MANAGEMENT'S job is to RESEARCH health risks associated with asbestos and new ways to control asbestos dust. PROVIDE a workplace which complies with government standards and INSTRUCT employees about the dangers and methods of control.

Employee's Job—



EMPLOYEE'S job, YOUR job,
is to know how to protect yourself
on the job by learning—

1. What asbestos containing materials
are made or used at your workplace.
2. How to handle and work with
these materials.
3. How to maintain control.
4. The importance of cooperating with
government and management to
get the job done safely.

**AFTER ALL—it's your health and safety
and nothing is more important.**