

1 in a plant that has local exhaust ventilation for
2 control. So it is not a situation where there is not
3 at least some control, and even in that situation the
4 concentrations are very high.

5 Q If a product such as Kaylo when it was cut
6 and sawed was capable of producing asbestos-containing
7 dust and that dust was visible, do you have an opinion
8 with reasonable scientific certainty as to whether the
9 product was hazardous?

10 A Clearly so. As I have testified, the point
11 you see visible dust, minimally, sort of threshold,
12 minimally 15 to 20 million particles and you don't
13 know how much higher than that you are, but you know
14 at least you are in that threshold.

15 Q Now, are you familiar with an organization
16 known as the Industrial Hygiene Foundation?

17 A Yes.

18 Q And are you familiar with a Mr. Hemeon?

19 A Yes. He was an industrial hygiene engineer,
20 I believe, with that group.

21 Q In 1947 approximately one year after the