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IN THE COURT OF COMMON PLEAS

CUYAHOGA COUNTY, OHIO

JANE CUNNINGHAM, Executrix
for the Estate of
David G. Cunningham,

Plaintiff,

-vs-

JUDGE TALTY
CASE NO. 150433

AKRON GASKET & PACKING
ENTERPRISES, INC., et al.,

Defendants.

- - - -

Deposition of WILLIAM MCCORMICK, taken as if upon cross-examination before Gala J. Marzec, a Notary Public within and for the State of Ohio, at the offices of Bevan & Economus, Northfield Road, Northfield, Ohio, at 10:00 a.m. on Friday, October 25, 1991, pursuant to notice and/or stipulations of counsel, on behalf of the Plaintiff in this cause.

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employees?
A. There was a potential problem.
Q. Are you aware of any specific industrial hygiene memos at B.F. Goodrich Company relating to not potential problems but actual problems based upon measurements taken by the industrial hygiene department, asbestos exposure?
A. I think we perhaps took some measurements. I think we perhaps took some measurements at this operation.
Q. Did those measurements indicate to you that there was a hazard to employees?
A. I don't recall specifically, because that's been years ago. But we did do air sampling. We also examined personnel.
Q. Did you do air sampling on a regular basis in every department?
A. It depends by what you mean by regular.
Q. Every day?
A. No.
Q. Every week?
A. No.
Q. Every month?
A. No.
Q. Every six months?

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A. It would vary.
Q. So you really don't know how often you did it or how frequently?
A. No, I don't.
Q. There was no program set up at Goodrich which established a periodic air sampling regimen in every department that you know of?
A. No.
Q. Are you familiar with whether or not -- strike that.

Let's talk about air sampling a little bit more. Did you personally ever conduct any air sampling in any of the tire curing areas?
A. I probably did.
Q. Do you have any records of that that you can show me?
A. No.
Q. Do you recall the results of those air samplings?
A. No.
Q. Do you recall how often you did it?
A. No.
Q. At Goodrich was the curing area also known or were the curing areas --

There were more than one tire curing

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A. A compounder?
Q. Yes.
A. A compounder was basically a chemical engineer who devised formulations, checked raw materials, did a number of things.
Q. Would a compounder have been exposed to asbestos containing materials at the Goodrich?
A. Probably not.
Q. Was raw asbestos used in the calendar room?
A. No.
Q. Did you or anyone in your department ever monitor for asbestos in the ambient air at the B.F. Goodrich in the 1940's and 50's?
A. I do not know. That's a long time ago.
Q. Do you recall specifically when you yourself first became involved in air monitoring at the Goodrich?
A. Oh, I became involved from 1946 on.
Q. In air monitoring?
A. To some degree.
Q. Did you keep records?
A. Yes.
Q. You don't know where they are?
A. They're with the B.F. Goodrich Company. They were there when I retired. I don't know where

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they are now.
Q. Are you aware as we sit here that asbestos exposure can cause disease in human beings?
A. Yes.
Q. When did you first become aware of that fact?
A. Oh, I can't recite dates. But certainly back in the late 30's probably.
Q. Are you familiar with the department 153 in Building 5-F at the Goodrich?
A. No. I'm not familiar with it.
Q. Do you know whether or not asbestos was ever used as a binder in rubber formulation in that department?
A. I don't know.
Q. You don't know?
A. No.
Q. Do you know whether employees at the Goodrich ever used wire brushes and drills to cut asbestos blocks used at Goodrich, one of the hazards in the ink mill with asbestos exposure at Goodrich?
A. No.
Q. Do you know whether or not Goodrich was ever cited by the U.S. government for violation of standards regarding airborne asbestos?

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Q. That's a very general term. Are you familiar with a principle which indicates that asbestos fibers once released into the ambient air have a tendency to settle, and once settled, again released based upon sweeping or blowing or some other such of mechanical action?
A. Perhaps no more than any other particles of dust that settle.
Q. Do you know whether or not at Goodrich that was ever a concern?
A. Never a concern for us.
Q. Never a concern. Okay. Why was that?
A. Why was it?
Q. Yes. Why wasn't it a concern?
A. We wouldn't be any more concerned about that than we would with sweeping city streets --
Q. Why not?
A. -- which contain asbestos fibers.
Q. Except you had no control over the sweeping of city streets containing asbestos fibers?
A. That's correct.
Q. But you did have control over Goodrich?
A. Yes and no, but not to that degree.
Q. When you did air sampling studies at the Goodrich, if you found what you believed to be

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asbestos in the ambient air, would you make a report of it?

A. Oh, yes.

Q. Would you let the employees in the area where the sample was done know of the contents of your report?

A. No.

Q. Why not?

A. The company policy, and I think this was at that time, perhaps still is, very general. The reports went to management with recommendations, if there were any recommendations.

Q. Up until the late 50's at Goodrich no one had done any work on anything that could be related to asbestos, is that a fair statement?

A. You'll have to define your terms. You said no one did any work on asbestos. I can't verify that. I don't know.

Q. Did you establish an industrial hygiene laboratory at the Goodrich?

A. Yes.

Q. In the mid to late 50's?

A. I established a laboratory soon after I came there in 1946.

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