

1 to do to the half-rounds when they would get to the
2 end of the section or a turning section?

3 A Well, they would have to saw the miters and
4 then they would mud the fittings, the joints with the
5 fittings and tie it on with wire.

6 Q Now, when they would saw the miters, what,
7 if anything, would be created when it was sawed?

8 A It would be dust flying like that, heavy
9 debris.

10 Q What would the construction site look like
11 at Sinai during these 12 months when the pipecoverers
12 were cutting or sawing or applying the pipecovering at
13 this location?

14 A Well, it would be dusty, just like the
15 plaster would be dusty, too. All trades had created
16 dust.

17 Q Okay. Now, sir, during this period of time
18 did you have an occasion to learn which pipecovering
19 the pipecoverers were putting on the pipes at Sinai
20 for the 12 months when you and Mr. Vandergucht were
21 working there?