

Page 74 1 transmission of a truck? 2 MR. RADCLIFFE: Object to the form. 3 A. Excuse me. Could you repeat that question? 4 Q. Sure. How often did you have an opportunity 5 to observe mechanics in the shop doing an R&R on a 6 clutch on a truck? 7 A. I don't know. Maybe 3, 400 times. Most of 8 the time when we put on a clutch school we'd have the 9 mechanic -- one of the mechanics or a couple of the 10 mechanics do a clutch removal and replacement. 11 Q. Now, was that in their facility? 12 A. In most cases, yes. 13 Q. And you said this practice started in 1979? 14 A. No, '71 about, '70, '71 when I first went out 15 to the eastern region, from then until about '76, '77, 16 someplace in there, when I went back to Auburn. 17 Q. And during any of those R&R's, did you ever 18 see the mechanics using compressed air to clean out 19 the bell housing? 20 A. No. We took the air hose away from them when 21 I was there. 22 Q. And why did you do that? 23 A. Because part of our presentation was that you 24 didn't use an air hose on a truck. It did create road 25 dirt/dust in the air if you blew it. Our instructions	Page 76 1 MR. SMITH-GEORGE: I respectfully object 2 to responsiveness. 3 Q. I'm asking you when did you first become 4 aware of any health hazards associated with the 5 inhalation of asbestos dust and fibers, regardless of 6 the source. 7 MR. RADCLIFFE: Object to the form. 8 A. I can't put a time on it. I would say in the 9 early 70's. 10 Q. And your opportunity to -- well, let me ask 11 you this: What would happen if you got grease on the 12 asbestos surface of the discs? How would that affect 13 the operation of the discs? 14 A. The grease would probably be gone within the 15 first engagement. 16 Q. Are you saying it would have no effect at 17 all? 18 A. I don't think you'd notice it unless you 19 really smeared the disc with grease. But a little bit 20 of grease wouldn't even be noticed. 21 Q. And from your review of mechanics doing truck 22 installation, have you ever observed them lightly 23 sanding the surface to remove grease spots? 24 A. No. 25 Q. When you were participating in these schools,
Page 75 1 were to wipe the flywheels and any component parts 2 down with a solvent and a rag. 3 Q. Was there -- was any -- was there any concern 4 for the entrainment of asbestos dust by using an air 5 hose on the bell housing or was it all just for 6 general dirt and grime? 7 MR. RADCLIFFE: Object to the form. 8 A. The reason for not using the air hose was 9 because you blew things out and got them in your eyes 10 and that sort of thing. There was no concern about 11 asbestos at the time that I knew of, anyway. 12 Q. Were you aware at this point in time, '70, 13 '71, of any health hazards associated with the 14 inhalation of asbestos dust or fibers? 15 MR. RADCLIFFE: Object to the form. 16 A. Not with friction product asbestos. I can't 17 say that I didn't know that there was insulation 18 things being written or going on at that time. 19 Q. When did you first become aware of 20 allegations of health hazards associated with the 21 inhalation of asbestos dust and fibers? 22 MR. RADCLIFFE: Object to the form. 23 A. I haven't become aware that there's a health 24 hazard with friction product asbestos. 25 Q. That wasn't my question.	Page 77 1 did you ever instruct anyone to wear a respirator or a 2 dust mask? 3 A. No. 4 Q. When's the last time you performed one of 5 these schools? 6 A. Probably in the mid 80's, '85, '86. 7 Q. And when's the last time that you had the 8 opportunity to observe a mechanic performing an R&R on 9 a manual clutch? 10 A. Probably about that same time. 11 Q. And at any point in time during those 12 observations, did you yourself wear a dust mask? 13 A. No. 14 Q. Now, you said you conducted these schools, 15 you believe, about four or five times; is that 16 accurate? 17 MR. RADCLIFFE: Object to the form. Four 18 or 500. 19 Q. Oh, did you say 4 or 500? That's why I 20 asked. 21 A. Right. I'd say 4 or 500 over that period of 22 time. 23 Q. So this is -- this is something -- you were 24 in -- how long were you in the eastern region? 25 A. From about '71 to '76, '77. Someplace in