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1 semi-metallic on all of its brake products?

2 A. Because actually all brake systems were not
3 designed to run with semi-metallic.

4 Q. You said in the beginning of this deposition
5 or near the beginning of this deposition that Mr. Huff
6 was the person that had your job before you; is that
7 correct?

8 A. Uh-huh.

9 Q. Have you ever read Mr. Huff's deposition that
10 he gave on February 26th of 1988?

11 A. No.

12 Q. I want to ask you about something that's
13 stated in that deposition, whether you agree with it.

14 On page 44 and 45 of the deposition, Mr. Huff
15 indicates that Rayloc had procedures in its plants in
16 the 1940s for taking precautions with respect to
17 asbestos. Are you familiar with those precautions?

18 A. I can only speak from the point of view that
19 when I came into the plant in '76, it was already in
20 place, monitoring and industrial hygiene testing going
21 on. I can't go back to the '40s.

22 Q. As the corporate designee of Genuine Parts,
23 are you familiar with any precautions for containing
24 or containerizing asbestos that go back to the 1940s?

25 A. I'm not familiar with that.

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1 you on page 47: What precautions were taken back in the
2 '40s or, you know, the '50s, when you first began the
3 Atlanta plant, with reference to grinding asbestos brake
4 linings?"

5 The answer Mr. Huff gave was: "Well, it
6 was accumulated on the early grinders. They were
7 hand-operated grinders. We have automated over a period
8 of time. The early grinders were hand-operated grinders
9 and had bags on them, very much like a vacuum cleaner.
10 And the material was collected in those bags and then
11 transformed to a larger container."

12 Are you familiar with that process?

13 A. I'm familiar with that process.

14 Q. Do you have any knowledge of how far back that
15 process goes?

16 A. With Rayloc?

17 Q. Correct.

18 A. No, I do not.

19 Q. What is your understanding for that process,
20 the reason for that process?

21 A. The reason for it is you don't want dust all
22 over the place. So these machines he's speaking of were
23 hand grinders. And they did have a vacuum unit attached
24 to them, just like a vacuum cleaner. And then you would
25 take that and transfer it over to a larger container.

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1 Q. Okay. Are you familiar one way or another
2 whether or not in the 1950s, as testified by Mr. Huff,
3 the company had concern about the dust that was
4 emanating from its grinding operations?

5 MR. RILEY: I object to the form of the
6 question. Do you have a specific quote that
7 you want to refer him to?

8 Q. (By Mr. Dumler) Here's the question:

9 Page 47: "So even back in the 1950s, your
10 company was concerned with the dust that was
11 emanating from the brake linings?"

12 Answer: "Oh, yes."

13 Do you have any knowledge of that one way
14 or the other?

15 A. I can't speak for the '50s.

16 Q. You have no knowledge one way or the other
17 whether in the 1950s the company was concerned about the
18 dust that was coming from the brake lining grinding
19 operations?

20 A. I do know that Genuine Parts' Company has
21 always been concerned about good housekeeping.

22 And it was dust. What type of dust, I don't
23 know. But I do know they are very sticklers on
24 cleanliness.

25 Q. On page 40 -- let me read the full quote to

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1 But it was to prevent getting dust all over the place.

2 Q. Are you familiar with the vacuuming procedures
3 that the company put in place in the 1960s?

4 A. Yes.

5 Q. Tell me about those. What procedures were put
6 in place?

7 A. These were central vac units that had big dust
8 collectors. They were driven by like 25-horsepower
9 motors. And they had vacuum suction areas wherever
10 there was processing of asbestos.

11 Q. Who was the person responsible for deciding
12 that these vacuum procedures were going to be put in
13 place?

14 A. General manager.

15 Q. Who was that at the time?

16 A. What time?

17 Q. Well, when the procedures were first
18 initiated, who was the person that did it?

19 A. Oh, I can't -- I don't know that.

20 Q. But it's fair to say that the vacuum
21 procedures were put in place because of a recognition
22 that you did not want asbestos dust that wasn't taken
23 out by a vacuum process?

24 A. That wasn't taken out by a vacuum process?

25 Q. Correct.

23 (Pages 86 to 89)