

Gleason

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The Gleason Works

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BY UPS

September 16, 2008

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Matthew P. Donelson, Esq.
Elzufon Austin Reardon Tarlov & Mondell, P.A.
300 Delaware Avenue, Suite 1700
Wilmington, DE 19801

Re: Lawrence Dolney vs. The Gleason Works, et al.

Dear Matt:

These are our original documents which need to be returned to us.

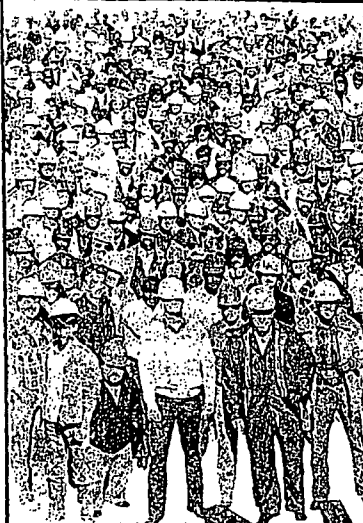
In the interest of time, we did not index the contents but trust you will review them.

Very truly yours,



Edward J. Pelta
Vice President, General Counsel & Secretary

EJP:ke
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CASE STUDIES

Coating Encapsulates Asbestos Insulation Economically

Encapsulating asbestos insulation on pipes and boilers with a special seal coating is cutting asbestos abatement costs for General Motors' Electro-Motive Div., LaGrange, IL. The durable material, Liquid Overcoat from Certified Technologies, Minneapolis, MN, can withstand vibration, abuse, impact, and moisture. The five-year project will cost \$2.5 million.

The 3-million sq ft facility contains some 500 miles of asbestos-covered pipe ranging in diameter from 1 to 24 in. The pipes carry steam, hot and chilled water, and return condensate. In addition, the plant has four, 3-story-high asbestos-covered boilers that furnish steam for heating and processing. Over the years, valve leaks, abrasion, sunlight, temperature extremes, and general wear and tear have caused the insulation to deteriorate.

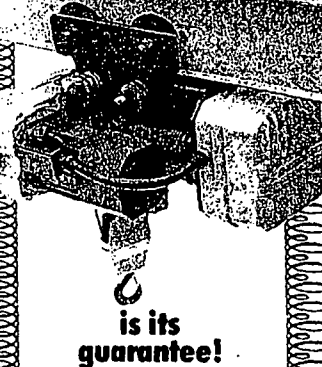
The first step in solving the problem was to perform an inch-by-inch inspection of all the asbestos insulation in the plant. Then, a committee, which included representatives from engineering, maintenance, safety, and industrial hygiene, was formed to establish a program for dealing with the substance in primary areas first and remote areas of the plant later.

Asbestos that was in bad shape was carefully and properly removed and taken to an approved landfill by an outside contractor. Where the material was in good shape, it was repaired and covered with the liquid overcoat. The material is a gel-like polymeric substance that forms an inert coating and prevents asbestos flakes and fibers from leaking out. It is slathered on the pipes either by hand or with a brush or roller, then smoothed out. The covering should last for decades with only an occasional touchup.

The cost of encapsulating the asbestos ran \$76/hour, lower, but not significantly different, than the \$87/hour cost of removing it. However, a worker can typically remove an average of 5 ft of asbestos an hour, at a cost of \$17.40 a foot, but can encapsulate 20 ft an hour, at a cost of only \$3.80 a foot. Encapsulation costs include removal or repair of any damaged areas with palm-grade Masticcoat from the same manufacturer, then covering it with the liquid coating.

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