

for plant physicals, injuries and other medical issues not handled by the nurse who was employed by Warner Electric Brake & Clutch Company. Industrial hygienists from NATLSCO and from Continental Insurance were used. Certain Warner Electric Brake & Clutch Company employees were responsible for knowing and implementing current government regulations relating to employee safety and industrial hygiene.

Over time, people supervised and/or administered: air sampling, ventilation, vacuum and bagging programs, x-ray programs, safety programs and physical examination programs. The United Steel Workers worked with the Company on health and safety issues. The Union and Company together established a Joint Safety Committee to work on health and safety.

INTERROGATORY NO. 48:

Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

ANSWER:

See Answer to Interrogatory No. 47, which is incorporated herein as if fully rewritten. Further responding, Warner Electric Brake & Clutch Company had employees whose direct responsibility it was to promote employee safety and industrial hygiene. Employees involved in plant safety included plant managers (*see* Answer to Interrogatory No. 38), union representatives, human resource people, an environmental person (last known person during time period that