

1 Q Can they remain and accumulate in the lungs?

2 A Yes, sir.

3 Q "When you see a dust cloud during
4 brake work you are seeing clumps
5 containing thousands of fibers."

6 Is that a factually accurate statement in June
7 of 1986?

8 A It could be but as presented it is not entirely
9 accurate because it gives you an impression that all
10 clumps contain thousands of fibers. That may or may
11 not be true.

12 Q So you believe the EPA is overly broad in that
13 statement?

14 A Yeah, I think they are just careless in their
15 writing.

16 Q Careless, okay.

17 A If not careless, not terribly specific or
18 scientific.

19 Q The next sentence:

20 "Most of the smaller fibers will not
21 show up with the methods commonly used
22 for measuring asbestos levels in the air,
23 such as the method used to determine
24 compliance with the OSHA asbestos
25 standard, since most asbestos fibers and