

Page 146

1 after it's being taken off the vehicle and been used?
 2 A. No.
 3 MR. RILEY: He answered that. He gave you
 4 the answer.
 5 Q. (By Mr. Dumler) I'm not talking about the
 6 interim steps. I'm talking about --
 7 MR. RILEY: He's telling you where the
 8 dust is created.
 9 Q. (By Mr. Dumler) Just so we're clear, the
 10 asbestos content or the time period where the burn
 11 occurs is after the product and the core is coming back
 12 after being used, correct?
 13 A. Yes.
 14 Q. Then it goes through whatever machinations it
 15 goes through and is put into the burner room, correct?
 16 A. No. It's in the burner room already.
 17 Q. Okay.
 18 MR. RILEY: All right. Describe for him,
 19 when the truck backs up to Rayloc and the
 20 barrels come off, how does it get from there
 21 to the point where this measurement occurred?
 22 THE WITNESS: All right. It is checked in
 23 on a receiving belt. After the receiving belt,
 24 it's put onto a cart. It is taken into the
 25 storage area. Then the orders are pulled, as

Page 148

1 this document for me, if you can, Exhibit No. 32.
 2 A. Okay. This is Travelers, Travelers Company,
 3 May 30th, 1989, Mr. Art Catlin, who is general manager
 4 of our Payson, Utah, facility.
 5 Q. This is a different facility; is that correct?
 6 A. Yes, it is.
 7 Q. Are you familiar with this report?
 8 A. Not this particular report.
 9 Q. Was it ever brought to your attention that the
 10 testing done on that facility exceeded recommended
 11 levels of asbestos exposure?
 12 A. No, not to my knowledge.
 13 (Plaintiffs' Exhibit LeCour 33 was marked.)
 14 Q. (By Mr. Dumler) Next I'm going to hand you
 15 Exhibit No. 33 -- it's a report done in 1991 by
 16 Travelers -- and ask you if you can identify that
 17 document for me?
 18 A. This is an engineering report. It says,
 19 Genuine Parts Company, Rayloc Division, Hancock,
 20 Maryland, Industrial Hygiene Evaluation. It's prepared
 21 by Travelers, or The Travelers. It is to a David W.
 22 Glassman, Control Engineering. It looked like they
 23 performed it. Environmental Service Unit, they worked
 24 for Travelers.
 25 Q. Did you receive notification of this report

Page 147

1 far as going now to the storage area and
 2 saying, I need this barrel of brake shoes.
 3 Those brake shoes are pulled.
 4 They are brought to the burn area. They
 5 are then processed in this burner with the
 6 1800 degrees Fahrenheit.
 7 And when they come out of the burner, then
 8 the friction material is removed off of the
 9 lining -- excuse me -- off of the table of the
 10 brake shoe. That is where the problem was,
 11 because the resins had been baked out of the
 12 lining.
 13 Q. (By Mr. Dumler) So after it went through the
 14 baking process --
 15 A. Burning.
 16 Q. -- burning process, there were still asbestos
 17 fibers left that were exceeding permissible levels;
 18 is that correct?
 19 MR. RILEY: Object to the form of the
 20 question. After the resins were baked out,
 21 that's why there were fibers.
 22 THE WITNESS: Yes.
 23 MR. DUMLER: Okay.
 24 (Plaintiffs' Exhibit LeCour 32 was marked.)
 25 Q. (By Mr. Dumler) Let me have you identify

Page 149

1 when it occurred?
 2 A. No, I did not.
 3 Q. The report indicates that the exposure to
 4 asbestos fibers for the chopper operator exceeded
 5 50 percent of the action level. What exactly is the
 6 chopper operator doing?
 7 A. That is to remove riveted brake lining from
 8 the brake shoe, which would be similar to the one I just
 9 told you about on the debonding of.
 10 Q. How is the chopper's position different than
 11 the burner?
 12 A. It's located basically in the same area, but
 13 it's a different procedure done to a riveted shoe than
 14 it was done to the bonded shoe to remove the friction
 15 material.
 16 Q. So explain to me what the chopper does as
 17 opposed to the burner.
 18 A. Okay. The burner basically burns the linings.
 19 Everything goes through there to remove the grease,
 20 okay.
 21 Then when the shoe comes off, if it's bonded,
 22 then it removes. You pick it up, and you separate the
 23 two, the shoe and the table.
 24 The riveted has to go over to the chopping
 25 area. And it actually is a blade that goes in and

38 (Pages 146 to 149)