FILE: CHRYSLER

SUPERIOR COURT OF NEW JERSEY

MIDDLESEX COUNTY- LAW DIVISION

MARSHALL COATES, et ux,

Plaintiffs,

-vs- Docket No. L-095651-85

RAYMARK INDUSTRIES, INC., et al,

Defendants.

GEORGE C. SCHRAMM, JR., et ux,

Plaintiffs,

-vs- Docket No. L-080949-86

EAGLE-PICHER INDUSTRIES, INC, et al,

Defendants.

BRUCE RUSSO, et ux,

Plaintiffs,

-vs- Docket No. L-085514-85

EAGLE-PICHER INDUSTRIES, INC., et al,

Defendants.

ARTHUR STERNER, JR., et ux,

Plaintiffs,

-vs- Docket No. L-089353-85

RAYMARK INDUSTRIES, INC., et al,

Defendants.

DEPOSITION OF GERALD A. SATTELMEIER

QUALIFIED COURT REPORTERS, INC.
30539 N. GREENBRIAR, FRANKLIN, MI 48025 PH: 855-3328

The Discovery Deposition of **GERALD A. SATTELMEIER**, taken before Lisa K. Traylor, CSR-3428 and Notary Public in and for Wayne County, Michigan, at Chrysler Corporation, 12000 Chrysler Drive, Highland Park, Michigan, on Thursday, the 9th day of March, 1989, commencing about 10:00 o'clock a.m., pursuant to the Michigan Court Rules.

APPEARANCES:

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* * *

Thursday, March 9, 1989

Highland Park, Michigan

10:00 a.m.

* * *

MR. CIFALDI: Good morning, Mr. Sattelmeier. My name is Angelo Cifaldi and I represent various plaintiffs in various actions brought in New Jersey. We're here today for the purposes of taking your deposition. Have you ever had your deposition taken before?

THE WITNESS: Yes, I have.

MR. CIFALDI: How many times?

THE WITNESS: A couple times.

MR. CIFALDI: Nonetheless I'd like to give you a few ground rules before we start. Most importantly please listen to my question. If you don't understand it, you don't understand a word I use please tell me and I'll be glad to rephrase it. If you do answer my question I'm going to make the assumption you understood the question and you're answering it to the best of your ability. Do you understand

that instruction?

THE WITNESS: Yes, I do.

MR. CIFALDI: Also if there is ever a time you would like to take a break or you would like to confer with your attorney please ask me and I'll be glad to accomodate you. Do you understand that instruction?

THE WITNESS: Yes, I do.

MR. CIFALDI: Also as you may know from your past depositions it is very hard for the court reporter to take down two people's talking at one time, especially attornies. So if the occasion arises please prevent that from happening.

Finally, you have to understand this testimony can be used at trial and will have the same weight as if you were testifying at trial. Do you understand that instruction?

THE WITNESS: Yes, I do.

EXAMINATION

BY MR. CIFALDI:

Q. Can you state your full name for the record please?

systems installed, I'm sorry, yeah, I guess the proper term is ventilation systems at sites where asbestos was utilized in the plant?

MR. BUMGARDNER: In the manufacture of brake linings?

MR. CIFALDI: Yes.

THE WITNESS: Yes.

Q. (BY MR. CIFALDI) Could you just briefly identify those areas that had ventilation systems that were working with asbestos?

A. Yes. The saws, the bipel machines, the mixing operations, grinding operations, that's it.

Q. What about the drilling operations?

A. I don't remember any drilling operations.

Q. What about a riveting operation?

A. I don't remember any riveting operations.

Q. What about any packing operations?

A. There's ventilation systems certainly in some of the transfer operations.

Q. Why was ventilation included in the transfer operations?

MR. BUMGARDNER: If you know.

THE WITNESS: Because there

A. I don't recall any specific discussion.
Q. Do you recall if over the time period that the tests were taken and you were involved with them deleting or adding any specific sites at the Trenton facility or specific work stations?
A. I can only tell you that each time I would go to the plant I would make a decision as to which jobs to sample. It wouldn't be deleting and it wouldn't be adding, it would be making a decision based primarily on the process and my judgment as to where the highest concentrations or the most likelihood of over-exposure existed.
Q. When you mentioned you took into account the process that was occurring, were there some processes that in your judgment created more dust than in other processes?
A. Yes.
Q. Could you tell me what those areas were?
A. Mixing operations, sawing, grinding.
Q. In your mind those were the three areas that generated the most dust?
A. Major sources.
Q. Next document I'd like you to look at will be marked P-Chrysler-6 for identification. It is

A. A hand grinder normally would be referring to a machine that someone would be standing at and operating the grinder as opposed to an automatic kind of grinding machine.

Q. On this document, again I know you weren't familiar because you didn't participate in these tests, there are locations listed as bay C8, bay B8, bay B5. Is the Trenton chemical plant broken down into various bays?

A. Yes.

Q. There's a bay marked B-5 which says brake shoe packer and it says personal air sample. While not participating directly in this study have you been involved in any dust counts that it measured the dust counts by the brake shoe packer?

A. I don't remember personally being involved in it.

Q. Okay. Simply the brake shoe packer does he pack the brake linings into a box, is that his job?

A. I can't specifically say what he does. It could be into some kind of container to be shipped to our assembly plant or wherever they're going to be used.

Q. Were you involved in those tests?
A. No.
Q. Despite that fact, based on your experience and your review of those documents were there any areas that exceeded the TLV for that time period?
A. Yes.
Q. What were those areas?
A. Proof testing machine.
Q. Just stop for a moment on that. Can you tell me what a proof testing machine is?
A. No.
Q. Who might have that information?
A. The plant operating people.
Q. Any particular names?
A. I don't know.

MR. CIFALDI: I'd like to request information as to what function a proof testing machine is.

Q. (BY MR. CIFALDI) Was there any other areas that exceeded the TLV?
A. Yes.
Q. And what were they?
A. The Lodige mixer.

DATA SHEET

AIR-BORNE ASBESTOS CONCENTRATIONS

MAY 27 1963

Location	Results in Millions of Particles Per Cubic Foot of Air
Threshold limit value	5.0
At #1 saving machine - removing brake shoes	0.4
At #2 saving machine - removing brake shoes	0.3
At both Bolling Machines	1.0

The above samples were collected with a Mine Safety Appliances Company's Midget Impinger.

Ventilation

Location	Results in Feet Per Minute
At #1 saving machine	500 - 1100
At #2 saving machine	700 - 1200

The above measurements were made with an Alnor Velometer. Serial #2100.

PLAINTIFF'S EXHIBIT
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Chrysler Chemical Division
5437 W. Jefferson
Trenton, Michigan

Date of Investigation: May 19, 1965

ASBESTOS DUST

Sample No.	Location and Remarks	Million of Particles per Cubic Foot of Air
	Maximum Allowable Concentration	5
5C1	Breathing zone collected on the balcony level above the mixing units during the dumping of dry ingredients into the large funnel servicing the blenders on the first floor.	3.7
5C2	Breathing zone on the balcony opening and dumping ingredients into the small dry blender on this level.	3.3
5C3	General air taken on the balcony level during the mixing operation.	1.0
5C4	Breathing zone on the first floor--#1 inspection station after the double end grinder.	2.9
5C5	Breathing zone--#3 saw--operator removing linings from forming machine and stacking into curing trays prior to final cure.	6.7
5C6	Breathing zone--#1 saw--operator removing linings from forming machine and stacking into curing trays prior to final cure.	4.6
5C7	Breathing zone of operator of the double-end grinder at #1 inspection station.	.5
5C8	Breathing zone #1 inspector after double-end grinder.	.9
5C11	Breathing zone grinding low quality brake lining southeast corner of building.	.8
5C12	Breathing zone unloading linings from curing rack.	.6

PLAINTIFF'S EXHIBIT
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Data Sheet
Trenton Chemical
Friction Materials Building
June 1973

Asbestos Dust

			Asbestos Concentration in fibers*+per cubic centimeter
	Threshold Limit Value		5.0
	1976 Threshold Limit Value		2.0
	Location		
(10)	Bay E2	Batch weighman Personal air sample	0.4
(11)	Bay E2	Janitor cleaning up weigh-up area Personal air sample	< 0.1
	Bay E2	General area sample adjacent to weigh-up station	0.1
(12)	Bay C8	Line #1 shoe grinder operator Personal air sample	0.4
( )	Bay C8	Line #1 brake shoe proof tester Personal air sample	0.2
	Bay C8	General area sample adjacent to Line #1	0.2
( )	Bay B8	Line #5 shoe grinder operator Personal air sample	0.7
)	Bay B8	Line #5 inspector and packer Personal air sample	0.2
	Bay B8	General area sample adjacent to Line #5	0.1
	Bay B8	General area sample adjacent to Line #5 (repeat of above when ventilation became disconnected from shoe grinder for about one-half minute	0.4
(16)	Bay B5	#3 and #4 saws and press operator Personal air sample	0.4
(17)	Bay B5	Brake shoe packer Personal air sample	1.7

Data Sheet
Trenton Chemical
Friction Materials Building
June 1973

Asbestos Dust

Location		Asbestos Concentration in fibers* per cubic centimeter
Threshold Limit Value		5.0
1976 Threshold Limit Value		2.0
(1) Bay C5	Janitor cleaning balcony Personal air sample	0.3
(2)	Janitor operating Tennant floor sweeper Personal air sample	0.3
(3)	Janitor operating battery and A.C. powered Parker vacuum cleaners. Personal air sample	0.4
(4)	Trucker and checker driving outdoor lift truck used to transport wastes to the compactor Personal air sample	0.4
	General air sample adjacent to hopper of waste compactor at rear of building	33.0
	Eighteen feet inside rear middle door. Door was open and a natural wind was blowing in	0.3
	Repeat of the above when the wind was not blowing in the open door	0.1

* Fibers greater than five microns in length.

Data Sheet
Trenton Chemical Plant

Asbestos Survey
October and November 1974

Job Description	Asbestos Fiber Concentrations *
(14) Personal air sample, weigh-up	0.31
(15) Personal air sample, weigh-up	1.12
(16) Personal air sample, Bay F8, oven loading and unloading	1.43
(17) Personal air sample, disc brake shoe inspection	0
(18) Personal air sample, Cycleweld Assembler, loading and unloading pre-cleaned brake shoes	1.38
(19) Personal air sample, Champ Grinder #152774	0.58
(20) Personal air sample, proof testing, machine #152775	5.14
(21) Personal air sample, proof testing, repeat of (20) above	2.20
(22) Personal air sample, proof testing, repeat of (20) above	0.93
(23) Personal air sample, loading #1 disc brake pad grinder	0.82
(24) Personal air sample, inspector on #1 disc brake pad grinder line	3.10
(25) Personal air sample, loading #3 disc brake pad grinder	3.31
(26) Personal air sample, inspector on #3 disc brake pad grinder line	0.81
(27) General air sample, Bay C8, pillar directly adjacent to #3 disc brake pad grinder	0.17

* Asbestos fiber concentrations are given in fibers (greater than 5 microns in length) per cubic centimeter of air.

Location		Concentration
(11)	Personal air sample, #21 and #22 hot press operator	0.8
(12)	Personal air sample, #6 Bipel operator	0.3
(13)	Personal air sample, #7 Bipel operator and #26 hot press operator	0.7
(14)	General air sample, immediately adjacent to the #26 hot press	0.7
(15)	Personal air sample, #27 and #28 hot press operator	0.2
(16)	Personal air sample, #8 Bipel operator	0.2
(17)	General air sample, immediately adjacent to the #22 hot press	0.7
(18)	Personal air sample, #17 and #29 hot press operator	0.7
(19)	Personal air sample, #8 Bipel operator during cleanup operations only	1.1
(20)	Personal air sample, loading and unloading disc brake shoes at the Myr oven aluminum gasket bonding operation	0.5
(21)	Personal air sample, inspecting and packing disc brake shoes after Myr oven bonding, including cleanup operations	2.6
(22)	Personal air sample, champ grinder operator #152774, Mopar line	0.4
(23)	Personal air sample, champ grinder operator #152774, Mopar line, (time-weighted average concentration)	0.1

Location		Concentration
(24)	Personal air sample, Mopar line, proof testing on machine #152775	1.4
(25)	Personal air sample, packing drum brakes into cardboard boxes on the Mopar line	2.8
(26)	Personal air sample, sealing replacement part boxes on the Mopar line	0.4
(27)	Personal air sample, grinding drum brake shoes at the belt sander which is adjacent to the overhead ovens	0.7
(28)	General air sample, directly adjacent to the #2 overhead oven at breathing zone level	0.5
(29)	Personal air sample, loading the #1 overhead oven	0.2
(30)	Personal air sample, #1 slot grinder inspector	< 0.1
(31)	Personal air sample, #2 proof test and slot grind operator	1.7
(32)	Personal air sample, #2 slot grinder inspector	0.8
(33)	Personal air sample, #3 proof test and slot grind operator	1.3
(34)	Personal air sample, #3 slot grind inspector	1.0
(35)	General air sample, five feet northeast of the #3 proof test operation	< 0.1
(36)	Personal air sample, #1 OEM grinder operator (time-weighted average concentration)	0.4

Location		Concentration
(37)	Personal air sample, packing drum brakes on the #2 OEM line	0.7
(38)	Personal air sample, #1 and #2 saw line operator	1.2
(39)	Personal air sample, unloading drum brake linings after oven forming at the #1 and #2 saw lines	0.2
(40)	Personal air sample, aluminum gasket application	0.5
(41)	Personal air sample, loading disc brake shoes into the west side of the Conforming Matrix Washer	4.1
(42)	Personal air sample, loading disc brake shoes into the east side of the Conforming Matrix Washer	4.2
(43)	Personal air sample, weigh-up and #1 skip hoist loading	1.0
(44)	Personal air sample, weigh-up and #2 skip hoist loading	2.3
(45)	Personal air sample, weigh-up only (time-weighted average concentration)	1.2
(46)	Personal air sample, loading the #1 skip hoist (time-weighted average concentration)	0.1
(47)	Personal air sample, unloading the #4 lodige (time-weighted average concentration)	0.3
(48)	Personal air sample, unloading the #4 lodige mixer	0.7

Data Sheet
Trenton Chemical

ASBESTOS
June 1977

Location		Concentration (fibers, greater than five microns in length, per cubic centimeter of air)
OSHA PERMISSIBLE EXPOSURE LIMIT		2.0
13)	General air sample, Bay D-5, directly adjacent to the welding exhaust fan in the maintenance crib	0.2
14)	General air sample Bay #-9, directly underneath the screw conveyor	0.1
15)*	Personal air sample, Barker Permafuse operator	0.6
16)	Personal air sample, #1 proof test operator	0.3
17)	Personal air sample, #2 proof test operator	0.3
18)	Personal air sample, #3 proof test operator	0.6
19)	Personal air sample, #1 proof test and flat finish inspector	0.5
20)	Personal air sample, #3 proof test and flat finish inspector	0.7
21)	Personal air sample, OEM grinder operator	0.2
22)*	Personal air sample, inspection and packing on the OEM line, Time-weighted average concentration	0.3
23)	General air sample, Bay A-7, approximately 12 feet west of the OEM grinder	1.0
24)*	Personal air sample, Myr oven aluminum gasket inspection and packing, Time-weighted average concentration	1.9

Data Sheet
Trenton Chemical

ASBESTOS
June 1977

Location	Concentration (fibers, greater than five microns in length, per cubic centimeter of air)
OSHA PERMISSIBLE EXPOSURE LIMIT	2.0
25)* Personal air sample, load and unload at #3 and #4 saw lines, Time-weighted average concentration	0.3
26)* Personal air sample, load and unload at #3 and #4 saw lines, Time-weighted average concentration	0.5
27)* Personal air sample, aluminum gasket application at the K101 spray hood, Time-weighted average concentration	0.2
28)* Personal air sample, Myr oven aluminum gasket inspection and packing (see air-sample 24) Time-weighted average concentration	0.9
29) Personal air sample, pad only inspection, Time-weighted average concentration - wearing 3M 8710 respirator	2.1
30) Personal air sample, pad only inspection, Time-weighted average concentration	0.9
CHEMICAL BUILDING	
31) Personal air sample, loading 28 bags of Calidria resin grade Asbestos into the Day Blender	0.1

All determinations of airborne asbestos fiber concentrations were made by the Industrial Hygiene Laboratory using the membrane filter method at a magnification of 430X with phase contrast illumination.

Data Sheet

TRENTON FRICTION PRODUCTS

Location	August 29, 1977	Concentration (fibers, greater than 5 microns in length, per cubic centimeter of air)
	OSHA Permissible Exposure Limit	2.0
1)	Personal air sample, long riveting (inner disc brake)	1.1
2)	Personal air sample, short riveting (outer disc brake)	0.3
3)	Personal air sample, south disc brake drill press operator	0.5
4)	Personal air sample, north disc brake drill press operator	0.5
5)	Personal air sample, south Besly finish grinder operator	0.4
6)	Personal air sample, north Besly finish grinder operator	0.1
7)	Personal air sample, south Besly finish grinder inspector	0.2
8)	Personal air sample, south Besly rough grinder operator	0.4
9)	Personal air sample, north Besly rough grinder operator	1.1
10)	Personal air sample, pad only inspection, after Besly rough grinder operation, time-weighted average concentration based on 4 hours on and 4 hours off, (employee was wearing an air-purifying respirator)	37.8

PLAINTIFF'S EXHIBIT

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Data Sheet

TRENTON CHEMICAL PLANT

June 17 & 22, 1982

ASBESTOS

Location	Concentration (fibers per cubic centimeter of air)
OSHA Permissible Exposure Limit	2.0
6-17-82	
(1) Personal air sample, C. Gasiewski, #365-48-9745, No. 3 Bipel and No. 15, 16, and 18 hot press operator	1.8
(2) Personal air sample, T. Beaudry, #366-60-5292, No. 4 Bipel and No. 23, 25, and 26 hot press operator	2.2*
(3) Personal air sample, D. Fernandez, #370-58-4533, No. 1-4, Barker bonder operator	0.1*
(4) Personal air sample, J. Leone, #366-60-7707, No. 2 slot grind and flat finish operator	1.4*
(5) Personel air sample, K. Kearns, #207-38-8233, No. 2 slot grind and flat finish inspector	0.5
(6) Personal air sample, D. Sadler, #377-36-3927, weight-up	0.6
(7) Personal air sample, J. Ebbitt, #363-62-2512, No. 3 & No. 4 Bipel and No. 14 hot press operator	0.7
(8) Personal air sample, R. Ohanian, #368-50-5577, No. 2 hot press operator	0.2
(9) Personal air sample, J. Owens, #413-64-6016, No. 178961 Besly grinder operator (K body disc brakes)	< 0.1

PLAINTIFF'S EXHIBIT
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