

FILE NAME: BF Goodrich (BFG)

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AFFIDAVIT

COUNTY OF SUMMIT)
) ss
STATE OF OHIO)

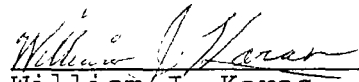
NOW COMES the affiant, William J. Karas, first being duly sworn and states as follows:

- 1) That I am over the age of 18 years, am not under any restraint or legal disability, am competent to testify to the matter stated herein and make this affidavit based upon my own knowledge.
- 2) I was an employee of the BFGoodrich Company in Akron from 1945 to 1985. My job description was maintenance pipefitter.
- 3) The following asbestos-containing products were used at BFGoodrich Company:
 - a. Kaylo pipe insulation
 - b. McNeil curing presses
- 4) The maintenance pipefitters at BFGoodrich were responsible for maintaining piping throughout the BFGoodrich plant (steam lines, hot water lines, cold water lines).
- 5) Much of the piping throughout the BFGoodrich plant was insulated with asbestos. When repairing steam and hot water lines, the maintenance pipefitters would remove asbestos insulation. Our work created significant amounts of dust. All of the manufacturing areas contained this asbestos pipe insulation. All the tunnels that connected the buildings contained asbestos insulated pipes. The manufacturing areas also contained tanks, heaters, boilers, and presses that were insulated with asbestos.
- 6) I worked with asbestos insulation, packings, and gaskets on a daily basis and I have personal knowledge of the brands and types of materials that I used.

- 7) The BFGoodrich supervisors/management instructed us to use and install these asbestos products.
- 8) Prior to 1980, our employer, the BFGoodrich Company, never told us of the dangers of asbestos exposure including the risks of asbestosis, lung cancer, or mesothelioma.
- 9) BFGoodrich never told us to warn the production workers of the dangers of asbestos.
- 10) Prior to 1980, we (the pipefitters and other trades working directly with asbestos products) took no safety precautions regarding asbestos or asbestos products.
- 11) When we removed asbestos insulation from pipes, tanks, and machinery, we would throw it on the ground. When we removed asbestos gaskets or packing, we would throw it on the ground. Our work created significant amounts of dust.
- 12) We worked in close proximity to the production workers and the production workers were exposed to the dust that our work created.
- 13) Prior to 1980, BFGoodrich did not provide respirators or masks for the pipefitters and other trades working directly with asbestos products. After 1980 we were provided paper masks.
- 14) We began to use paper masks in approximately 1983. There were occasions when I would request a mask and there were none available. The supervisor would tell us "you have a job to do". We took that to mean that we were to do the job without a mask.
- 15) Talc/soapstone was used extensively throughout all the BFGoodrich manufacturing areas and created significant amounts of dust which the workers were exposed to. The BFGoodrich Company never gave the workers any warnings or took any safety precautions regarding talc/soapstone.
- 16) Lunch wagons came around to all of the manufacturing areas in the BFGoodrich plant. These lunch wagons came to the manufacturing areas so that the workers could eat there lunch in their departments. The individuals that ran the lunch wagons were in the manufacturing areas continually. I never saw any of the lunch wagon operators wearing any respiratory protection. I specifically recall the lunch wagons operating in this manner all throughout the 1950's.

- 18) The everyday wear and tear of the asbestos pipe insulation and asbestos insulation on machinery caused this insulation to fray, crack, crumble, and sometimes fall off. The deterioration of the asbestos insulation products created dust.
- 19) I recall that BFGoodrich Company used significant amounts of raw asbestos fiber throughout the 1950's. This material was used in the reclaim area and where asbestos sheet packing was made. There were no safety precautions when raw asbestos fiber was used during the 1950's.
- 18) Everyone who worked at the BFGoodrich plant, including the lunch wagon operators, were exposed to the asbestos and talc/soapstone products that I have discussed in this affidavit. The asbestos pipe insulation, talc/soapstone, raw asbestos fiber, and other asbestos insulation products were in every building of BFGoodrich Company and were in a constant state of disrepair. BFGoodrich Company provided no warnings to me or my co-workers about the dangers of asbestos prior to 1980.

FURTHER AFFIANT SAYETH NAUGHT.


William J. Karas

SWORN TO before me, a Notary Public, and signed in my presence this 23 day of March, 1998.


Notary Public

Janet L. Spellacy
Notary Public, State of Ohio
My Commission Expires November 15, 2001
Recorded in Medina County