

1 ANSWER: (a) Since 1977, S. K. Wellman, pursuant to OSHA regulations has
2 requested its employees working in areas with possible asbestos exposure to undergo
anterior and posterior chest x-rays;

3 (b) See answer to 4.05(a);

4 (c) X-rays were taken by radiologists in Cleveland, Ohio who were
contracted to perform these tests for S. K. Wellman;

5 (d) See answer to 4.05(a) above;

6 (e) None;

7 (f) Plant nurse and outside doctors;

8 (g) No such records exist as to info requested in this interrogatory.
4.06 For each and every such program identified in your

9 answer to the preceding interrogatory, describe in detail the
10 method by which the results of such testing was made available to
the employees.

11 ANSWER: Irrelevant objection.

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17 REQUEST FOR PRODUCTION S: Pursuant to CR 34, attach or
18 produce according to the above instructions a copy of the records
19 of the implementation of the afore-identified chest x-ray
20 programs.

21 RESPONSE: Irrelevant objection.