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1 I guess I would say three things. One, they
2 offer help with testing, dust levels. Two,
3 they provide further information about the
4 risks of asbestos exposure and means of
5 controlling it. And third, they seem very
6 active in urging their customers to pay special
7 attention to the dust exposure that their
8 workers have because they have included
9 information here that should make someone be
10 concerned.

11 Q. Okay.

12 A. And this goes on again and again
13 and again for some 90 some examples and by the
14 time you're through with 90 examples of the
15 same sort of theme, it's not as complicated as
16 you suggested. If they differ in their views,
17 there would be a problem. It's like a standard
18 operating procedure. That's the way they went
19 about doing business.

20 Q. What is that standard operating
21 procedure?

22 A. That you have to show to your
23 customers when there is a lot of discussion
24 about the dangers of asbestos partly in the
25 wake of OSHA, partly in the wake of EPA, you

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1 Carbide, I'm going to use the term warn, warned
2 its customers of the dangers of asbestos and
3 suggested to its customers that if they
4 followed certain controls and precautions, they
5 can minimize that danger?

6 A. They can reduce that danger.

7 Q. Reduce that danger?

8 A. Reduce that danger to levels
9 which at the time given the understandings were
10 once that were reasonable.

11 Q. Do you know if Union Carbide's
12 customers ever passed that information on to
13 their customers?

14 A. I don't know that.

15 Q. Would that be something you'd be
16 interested in knowing?

17 A. Well, it would widen the sort of
18 things that I would have to look into and I
19 don't know how I would get those documents
20 frankly. It's not something that I have
21 studied enough to have an opinion about and the
22 question is if I could have the information, I
23 could weigh one against the other.

24 I would certainly be curious
25 about whether this was passed on or not. And

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1 can't possibly persuade your customers that
2 this is a safe product unless you make some
3 effort to describe to them how to make it safe
4 for their workers. So as a business
5 proposition, not as a high-minded proposition,
6 as a simple business proposition, they faced a
7 lot of concern and fear in the context of the
8 1970's.

9 Secondly, having faced that they
10 operated in ways consistent with the way they
11 behaved before. I think the most important
12 standard operating procedures is this is a
13 chemical company. A lot of what they produced
14 is dangerous. So they need a reputation for
15 being responsible; otherwise their customers
16 are going to be fearful.

17 What I mean by standard operating
18 procedure is precisely that; what ordinary
19 routine actions do you take to keep your
20 customers believing that you are the kind of
21 outfit that takes into account the
22 circumstances in which they might be facing
23 trouble, either health effects on the workers
24 or legal liability.

25 Q. Is it your opinion that Union

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1 therefore, what the link in the chain -- what
2 was the final link in the chain that was or was
3 not connected.

4 Q. The simple answer is you don't
5 know?

6 A. I don't know.

7 Q. You've never asked Carbide for
8 that information?

9 A. I didn't pose that question. I
10 asked once about was there any evidence that
11 these companies neglected the stopping or took
12 a dim view of safety concerns and the only one
13 I can come to there is they wouldn't be writing
14 letters Union Carbide asking if there had been
15 some attention, but I couldn't speak about the
16 universe of the customers. I only know about
17 the letters asking for more information.

18 Q. Who are they?

19 A. They're in the 90 reports.

20 Q. You say you asked the question.
21 You asked the question to yourself as an
22 intellectual exercise; you didn't ask anyone at
23 Carbide that question or your lawyers?

24 A. I was curious myself, but not for
25 purposes of having an expert opinion. So I