4.07 Did defendant ever institute a safety program other than pulmonary function tests and x-ray exams for its asbestos-exposed workers?

ANSWER: S. K. Wellman has taken air samples in its facilities since the mid-1970s. For a time in the 1970s and possibly early 1980s when materials of unknown identity were being subject to certain processes in its laboratory, S. K. Wellman made respirators available to laboratory employees.

4.08 If the answer to the foregoing interrogatories is in the affirmative, state:

(a) The nature of such program(s);

(b) Whether such program was optional or mandatory; if mandatory, when it became so;

(c) The location(s) of such program(s);

(d) The date of service of such program(s);

(e) If any of the program(s) have undergone modification, the nature and dates of such modification;

(f) The custodian (by name, address and position) of records of such x-ray test program(s);

(g) The highest level of management (by name, address and position) who participated in the decision to institute such program(s).