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A. In referring to Document 28, the verbiage that was being used here was taken off of this (indicating), because BPI owned Raybestos Manhattan.

And so BPI sold – BPI makes the friction material. They sell to Rayloc, and they sell to Raybestos Manhattan, who they own.

Q. Just so I'm clear, you went out and duplicated or used theirs as a guide?

A. I would say as a guide, because I don't think it's verbatim on everything.

Q. And who's responsible for the decision of what to include and what not to include?

A. That would have been the product manager at Rayloc and the sales manager, marketing – sales and marketing manager, and our president of our division. And I'm sure it went to headquarters.

(Plaintiffs' Exhibit LeCour 30 was marked.)

Q. (By Mr. Dumler) I'm going to give you what's marked as Exhibit 30 and ask you if you can identify this document from Century Insurance?

A. Century Insurance, October 26th, 1971. It's to Mr. David Childress, who was the general manager of the Memphis plant at that time.

Q. This is in connection with your insurance company's efforts to regulate what's happening at the

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plant or investigate what's happening at the plant?

A. This would indicate their involvement.

Q. Was air sampling done each year at the plant?

A. Yes.

(Plaintiffs' Exhibit LeCour 31 was marked.)

Q. (By Mr. Dumler) The next document I'm going to give you is 31, which is a Travelers Engineering Report dated February 28, 1989. Are you familiar with this document?

A. No, I'm not.

Q. Are you familiar with Travelers performing air sampling at the Rayloc plant?

A. I'm familiar with them being there and performing the tests, yes.

Q. Were you involved at all in their notification that in certain areas, the samples were above recommended levels?

A. Was I notified officially by Travelers?

Q. Were you notified by anybody, officially or unofficially?

A. No.

Q. The report indicates that the eight-hour TWA exposure to asbestos fibers for the clutch disc drilling, the burn room, and the disc brake riveting operators exceeded the permissible exposure level.

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Were you notified of that at the time?

A. I knew we took corrective action in those departments.

Q. The burn room, what is the – the burn room is when the old lining is taken off?

A. Uh-huh.

Q. Is that segregated away from the other operations?

A. Uh-huh.

MR. RILEY: Use a word.

Q. (By Mr. Dumler) Is that a "yes"?

A. Yes.

Q. So the burn room is segregated away from the other operations in the plant?

A. Yes.

Q. And the burn room is where the old lining is taken off of the core?

A. Yes.

Q. Is that particular area – is that a dusty operation?

A. Is it?

Q. Yes.

A. At what time?

Q. In 1989, when they were doing the air sampling by Travelers.

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A. To answer that, it was a dusty application that had vacuum equipment in place, but we added additional procedure to get back within compliance.

Q. So after this air sample was taken in 1989, there were additional procedures put in place to reduce the level of asbestos exposure?

A. Yes.

Q. And the exposure or the asbestos that was monitored there would have been the material that existed after the brake came back, after it had already been used essentially, correct?

A. Well, actually, no. The dust would have been created after it had gone through 800 degrees Fahrenheit – excuse me – 1800 degrees Fahrenheit for five minutes, which takes and extracts all the res – not all of it, but burns out some of the resins that hold the fibers together. So that's where it created the dust.

When it came back to us from the jobber and on our receiving belt, where we also monitored, no problem, because it was still in solid form and had grease on it, had brake fluid on it. So had no problem there. It's after one of our procedures.

Q. Okay. The asbestos that's being produced and exceeding permissible levels is coming from the lining