

Without waiving the foregoing objections, Westinghouse believes that it would have been aware of and would have adhered to established threshold limit values as a measure of good industrial hygiene practices.

32. For each test described in Interrogatory No. 31, please give the name of the person conducting the test, the date of the test, and attach true copies of any documents, including but not limited to, reports, finding or memoranda concerning such tests or studies.

ANSWER:

See Answer to Interrogatory 31.

33. Please state the year that Defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee/official of the company receiving such advice.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Without waiving its objections, Westinghouse understands that the American Conference of Governmental and Industrial Hygienists (ACGIH) defines threshold limit value-time weighted average (TLV-TWA) as the eight hour time weighted average concentration of a substance to which nearly all workers may be repeatedly exposed (day after day) without adverse effect. Westinghouse was aware of published threshold limit values, or their equivalent, which would have been published at various times by the ACGIH or by OSHA. Westinghouse is unable to state the name of any single employee who received such information.

34. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- a) The date each such library was established;
- b) The location of each library;
- c) The name(s) of the librarian(s) since 1930;