

1 discuss it in their pamphlet, "Guidance For Preventing
2 Asbestos Disease Among Mechanics," correct?

3 MR. LANKFORD: Calls for speculation.

4 THE WITNESS: I wouldn't agree with that.

5 BY MR. RUCKDESCHEL:

6 Q Why not?

7 A Because the fact that they talk about it as
8 potentially historical issue doesn't mean they have
9 current concern for it.

10 Q Is there anything in the document that
11 indicates the EPA is discussing this historically as
12 opposed to a current concern?

13 A In my view it does, yes. It cites Rohl, 1976;
14 Lorimer, '76; Rohl, '77; Hatch, 1970; Hickish and
15 Knight, 1970. These are all papers that were done
16 almost a decade or more before this paper, and I know
17 from reading other literature that in fact it says that
18 the brakes no longer need to be ground and beveled for
19 the time period you told me to assume this
20 occurred, '78 to '85. It doesn't mean it never
21 occurred. I'm not saying it never occurred. I'm just
22 that saying by and large it didn't need to occur and it
23 was an unusual event. So that that's why I say I
24 believe they are talking about historical statement.

25 By the way, this document has many, many flaws