

FILE NAME: NS

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September 8, 2004

Dr. Barry Castleman
4406 Oxford Street; P.O. Box 188
Garrett Park, Maryland 20896

Re: **Michael Case v Norfolk Southern Railway**
Madison County FELA Asbestos Case
Trial Date: September 20, 2004

Dear Dr. Castleman:

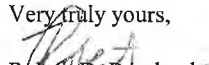
Enclosed herein please find the CV for a Mr. Larry Liukonen, the Defendant's expert regarding the above referenced matter. Apparently Mr. Liukonen is under the impression that asbestos fibers are not an actual danger to railroad workers. We would like to retain you as a rebuttal witness in this case.

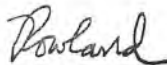
We are forwarding this information on to you for review. As you can see from the CV, Mr. Liukonen worked as the Director of Industrial Hygiene at Burlington Northern in Texas. We know that you have done extensive research regarding asbestos use by the railroads. I am interested in whether or not you might have some information regarding the Burlington Northern during Mr. Liukonen's tenure as Industrial Hygiene Director, such as Burlington's knowledge of the dangers presented by asbestos in the railroad workplace.

We are also interested in any additional records you might have regarding Norfolk Southern and their knowledge of the dangers presented by asbestos in the workplace and if you are in possession of any records reflecting prior claims/lawsuits by Norfolk Southern employees for asbestos injuries. Any information you can provide regarding this matter will be greatly appreciated. If you should have any questions, please feel free to call my office.

Thank you for your attention in the handling of this matter. Please forward your bill regarding the costs involved.

Very truly yours,


Robert D. Rowland
jmn



CURRICULUM VITAE

Larry R. Liukonen, CIH, CSP
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Burleson, Texas 76028
Email Address: techcon@flash.net

Business Phone: 817-453-0382
Cellular Phone: 817-235-5624
FAX #: 817-453-0383

Education and Certification

Bachelor of Science Magna cum laude in Biological Sciences, University of Minnesota (1969)

Master of Science in Environmental Health, University of Minnesota (1971)

Certified by the American Board of Industrial Hygiene in the Comprehensive Practice of Industrial Hygiene, (CIH) Certificate #1094 (1976)

Certified by the Board of Certified Safety Professionals, (CSP) Certificate #8234 (1986)

Professional and Technical Associations

American Industrial Hygiene Association (1974-Present)
American Academy of Industrial Hygiene (1976-Present)
American Society of Safety Engineers (1986-Present)
North Texas Industrial Hygiene Association (1984-Present)
(Past President 1986-1987)
Texas Industrial Hygiene Council (1994-Present)

Work Experience

August 1988 - Present:
Technical Safety and Health Consulting, Inc. (DBA TechCon, Inc.), a comprehensive industrial hygiene and safety consulting firm.

June 1987 - August 1988
Industrial Hygiene & Safety Technology, Inc., a comprehensive industrial hygiene and safety consulting firm.

January 1979 - June 1987
Director of Industrial Hygiene, Burlington Northern Railroad Company, Fort Worth, Texas. Established and directed the industrial hygiene program with up to 58,000 employees. Directed asbestos surveys, evaluations, and removal programs of over 4,000 buildings.

C.V. of Larry R. Liukonen**Page 2****Work Experience (continued)****February 1975 - December 1978**

Industrial Hygienist, Naval Regional Medical Center, Bremerton, Washington. Responsible for industrial hygiene program for 6,000 workers and shared responsibility for additional 10,000. Extensive work with asbestos, cadmium, noise, and other industrial hygiene concerns.

January 1972 - January 1975

Lt. Commander USNR Naval Environmental Health Center, Cincinnati, Ohio. Consultant to various Naval industrial facilities in comprehensive industrial hygiene, air and water pollution. Conducted wall to wall industrial hygiene surveys at aircraft maintenance facilities and ordnance plants.

Asbestos Experience and Training

Developed U.S. Navy's first video training program on asbestos removal for non-insulation workers.

Authored complete study on all aspects of asbestos gasket use at Puget Sound Naval Shipyard in Bremerton, Washington.

Directed asbestos survey, evaluation and removal program of over 4,000 buildings.

Certified as proficient in analysis of asbestos air samples for nine years.

Attended NIOSH Course - Sampling and Evaluating Airborne Asbestos Dust (1973).

Instructor in Course (1987).

Attended University of Missouri Workshop - Safe Removal of Asbestos from Buildings and Structures (1983).

Attended University of Texas - EPA Asbestos Abatement Training Program: Practices, Procedures and Supervision (1987).

Attended University of Texas - AHERA Inspectors Course (1988).

Attended University of Texas - AHERA Management Planners Course (1988). Also an instructor.

Attended Inspectors and Management Planners Refreshers Course (1989).

C.V. of Larry R. Liukonen**Page 3**

Instructor of Contractor/Supervisor and Worker Training Courses.

Conducted study of gasket removal at Trinity River Water Treatment Facility, monitoring asbestos exposures of employees involved in removal (1991).

Conducted study of gasket removal at major mechanical repair facilities, monitoring exposures of employees involved in removal (1990-1991).

Noise Experience and Training

Attended Pennsylvania State University - Industrial Noise & Engineering Control.

Attended Council for Accreditation in Occupational Hearing Conservation - Occupational Hearing Conservationist.

Attended Council for Accreditation In Occupational Hearing Conservation - Audiometric Technician Training.

Attended American Industrial Hygiene Conference Course - Advanced Industrial Noise Exposure Monitoring and Related Instrumentation.

Attended American Industrial Hygiene Conference Course - Human Response to Vibration.

Extensive experience in noise dosimetry, sound level testing, and frequency analysis.

Comprehensive Background, Experience, and Training

Experience in a wide range of industrial operations including; railroads, shipyards, aircraft maintenance, explosives, foundries, research and development, hospitals, and hazardous waste sites.

Additional training in:

- Ventilation
- Toxicology
- Ergonomics
- Indoor Air Quality

Publications

Diesel Particulate Matter Exposure to Railroad Train Crews, Liukonen, L.R., J. L. Grogan, W. Myers, AHJAJ 63:610-616 (2002).