

Only loose, friable asbestos fibers are capable of being hazardous to a person. Products which are encapsulated by the manufacturing process, or encapsulated asbestos which is located in the internal components of a particular piece of equipment, or which because of the nature of the product loose, friable fibers are not normally released, do not present a health risk.

Similarly, a product which might contain some amount of asbestos does not present a health risk to a particular worker unless that particular worker breathes sufficient quantities of fibers from that product.

46. Did Defendant give any warnings to ARMCO/A.K. Steel Middletown Plant and/or ARMCO/A.K. Steel Hamilton Plant regarding the potential health hazards of any product listed in response to Interrogatory No. 5. If yes, please state:

- a) Name of person most knowledgeable about this communication.
- b) Name of person at ARMCO/A.K. Steel Middletown Plant and/or ARMCO/A.K. Steel Hamilton Plant most knowledgeable about this communication.
- c) Dates of each communication.
- d) Contents of each communication.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to responding to this Interrogatory concerning any products not alleged to have contributed to the alleged injuries of plaintiff(s), on the grounds that the Interrogatory, as applied to Westinghouse, is overly broad and unduly burdensome and seeks information which is irrelevant and immaterial to these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence. If a particular plaintiff will specifically and credibly identify the Westinghouse product(s) alleged to have given off respirable asbestos fibers in his or her presence, Westinghouse will endeavor to answer this Interrogatory for such product(s), if any, to the extent Westinghouse reasonably can do so.

47. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following: