

FILE NAME: General Motors (GM)

DATE: 2003 July 2

DOC#: GM081

DOCUMENT DESCRIPTION: Invoice from Consulting Co. With Letter from BC  
Explaining Legal Relevance

**Dr. Barry Castleman**

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**From:** "Dr. Barry Castleman" <bcastleman@earthlink.net>  
**To:** <simons.tom@epa.gov>  
**Sent:** Wednesday, June 14, 2006 11:32 PM  
**Attach:** exp\_bill\_3\_30\_03.pdf  
**Subject:** Gold Book

Dear Mr. Simons,

I am writing to add a document to the file on the EPA brake mechanic guidance document. It is a copy of the invoice from the consulting firm, Exponent, to Daimler/Chrysler, Ford, and General Motors for "Technical Support - Asbestos Litigation," dated July 2, 2003. The last entry, "Prepare Materials to Challenge 1986 EPA," appears to refer to services in connection with the request received the following month by EPA to withdraw the excellent 1986 brochure, "Guidance for Preventing Asbestos Disease among Mechanics." If so, it would be consistent with the range of other services in the invoice and with the publication of recent reviews by Exponent authors, purporting to disprove the accepted view that brake mechanics' asbestos exposures cause asbestos diseases. It is also unusual and noteworthy that the Morgan Lewis law firm that submitted the request to EPA to withdraw the Gold Book never publicly identified its clients in this matter. If this bill does refer to work in connection with the push to get EPA to officially withdraw the Gold Book, it would follow that this really is an organized effort to use the EPA to generate evidence useful in defending damage suits brought by sick mechanics and their family members. The "collateral damage" to public health could be substantial, if EPA was to downplay brake hazards in response to this "Request for Correction of Information". This appears to be a clear case of abuse of the so-called Data Quality Act.

Please place this comment and the invoice in the docket OPPT-2003-0074.

I take this occasion to salute the dedicated civil servants at EPA who have worked hard to protect the public from asbestos hazards all these years.

Barry Castleman, ScD  
Environmental Consultant  
P.O. Box 188  
Garrett Park, MD 20896 USA  
Tel: 301-933-9097  
Email:

6/16/2006

Exponent

INVOICE

Please make checks payable to  
Exponent, Inc.  
P.O. Box 190281 Dept. 602  
Dallas, TX 75319-0281  
Billing Inquiries 414-641-0831  
Federal Tax ID: 7-0218904

July 2, 2003  
Invoice No. 95700  
Project No. 8601964.001

MICHAEL SULLIVAN  
CLARK HILL  
500 WOODWARD AVENUE, SUITE 3500  
DETROIT, MI 48226-3435

Professional Services for the period ending May 30, 2003

TECHNICAL SUPPORT - ASBESTOS LITIGATION

|                    | Services                                 | Expenses | Total     |
|--------------------|------------------------------------------|----------|-----------|
| Task: 0419         | ADDRESS PEER REVIEW COMMENTS MANUSCRIPT  |          |           |
|                    | 13,096.00                                | 457.00   | 13,553.00 |
| Task: 0420         | REV MASTER STATE OF ART EX BASED ARMDT   |          |           |
|                    | 1,000.00                                 |          | 1,000.00  |
| Task: 0421         | REVISED MASTER EPIDEMIOLOGY EXHIBIT      |          |           |
|                    | 780.00                                   | 136.20   | 916.20    |
| Task: 0422         | UPDATE MECHANIC MESO/LUNG CANCER MATERIA |          |           |
|                    | 2,212.50                                 | 1,001.17 | 3,213.67  |
| Task: 0427         | ASSIST DEPOSITION OF ALAN SMITH          |          |           |
|                    | 11,675.00                                | 747.17   | 12,422.17 |
| Task: 0429         | PREPARE MASTER SET OF PATHOLOGY EXHIBITS |          |           |
|                    | 6,605.00                                 | 288.00   | 6,893.00  |
| Task: 2301         | BRAKE DUST BIOLOGICAL STUDY PROPOSAL     |          |           |
|                    | 3,405.00                                 | 156.00   | 3,561.00  |
| Task: 2801         | RICHTER PREPARATION                      |          |           |
|                    | 1,500.00                                 | 66.62    | 1,566.62  |
| Task: 2901         | PREPARE MATERIALS TO CHALLENGE 1986 EPA  |          |           |
|                    | 1,030.00                                 | 80.26    | 1,110.26  |
| Total this Invoice | 41,303.50                                | 2,932.42 | 44,235.92 |

\*\* SEE BELOW FOR YOUR PORTION TO PAY \*\*

|                        |             |
|------------------------|-------------|
| DAIMLER CHRYSLER CORP. | \$14,745.31 |
| FORD MOTOR CO.         | \$14,745.31 |
| GENERAL MOTORS CORP.   | \$14,745.31 |

1. This invoice may not include expenditures such as communication, freight, and outside services that will be billed separately.  
2. All items received for analysis or inspection are subject to a 10% per month charge until paid.  
3. To ensure proper credit, please reference this invoice number on all payments.  
4. Correspondence address: 15475 NE 26th Place, Suite 130, Bellevue, WA 98007, telephone: (206) 451-7800, fax: (206) 451-7827

PAYMENT DUE  
UPON RECEIPT