

1 of ventilator or ventilation system would eliminate or
2 decrease the number of airborne asbestos fibers in
3 confined spaces.

4 They also answered in an interrogatory that
5 they were a member of the Industrial Health Foundation
6 and its successor, the Industrial Health Foundation
7 from the years 1942 to 1950, and 1953 to the present.

8 They were asked, state your knowledge
9 relating to the meaning of maximum allowable
10 concentration and/or threshold limit value as it
11 pertains to asbestos exposure and disease and in
12 reference thereto, state when and by what means you
13 obtained the information, the substance and whether
14 you advised or warned anyone.

15 Their response was that they are presently
16 unaware of when or from what source it first became
17 aware of threshold limit values.

18 Their next one was whether they have -- have
19 they or anyone on their behalf conducted or had
20 conducted any investigation of the statistical and/or
21 epidemiological relationship between the use of any