ANSWER:

Objection: this interrogatory wrongly assumes that there was a health hazard associated with the end use of the products. Subject to and without waiving objections, Warner Electric Brake & Clutch Company was aware that (1) SAE testing in the early 1970's concluded that vehicular clutch and brake products were not hazardous to end users in the use of those products (Asbestos Emissions from Brake Dynamometer Tests, A. E. Anderson, R. L. Gealer, R. C. McCune, and J. W. Sprys) and (2) that EPA test results showed total asbestos airborne emissions for vehicle brakes in use were considerably lower than earlier estimates (Brake & Clutch Emission Generated During Vehicle Operation, Michael G. Jacko, Robert T. DuCharme and Joseph H. Somers). Both studies were published by SAE.

In 1973, a representative of Bell Haven Laboratory opined to R. Rule of Warner Electric Brake & Clutch Company that the articles referred to above confirm his opinion that clutches and brakes in use, in effect, do not create a health hazard to end users using the product.

In February of 1978, after inquiry from the ANPA Research Institute, Warner Electric Brake & Clutch Company tested its electric tension brake to determine the airborne concentration of asbestos fibers in use. The test results confirmed that the fiber release for Warner Electric Brake & Clutch Company's electric brake and clutch products in use was significantly below the government and hygiene air standards. The air samples were taken by the Environmental Services Laboratory for the National Loss Control Service Corporation located in Illinois. All samples were taken over an eight-hour period with the brake operating at its maximum allowable torque level for the specific test speed as determined by brake temperature. The filter element was mounted parallel to the top of