

214 1 Sayers 2 Q. Are you telling us that you had this in 3 your possession and read it and absorbed that 4 information in your head, and you used that when 5 you called on these customers in England? 6 A. That's right. 7 Q. I wanted to ask you if there's any 8 references in this paper that the workers in the 9 paper mills need to wear masks or respirators when 10 they're using the chrysotile asbestos. Can you 11 tell us whether there are? 12 A. Short of reading it through, I certainly 13 could not answer that question. 14 Q. Is there any reference in there to the 15 threshold limit value of 5 million particles per 16 cubic foot of dust in paper mills that you talked 17 about earlier today? 18 A. If it is the early document, there would 19 not have been. 20 Q. Why is that? 21 A. Well, that information came to me later 22 on. 23 Q. Do you know when it would have come to 24 Mr. Woolery? 25 A. No idea.	216 1 Sayers 2 by Mr. Woolery that contained the information 3 described in your report, "Asbestos as a Health 4 Hazard in the United Kingdom"? 5 A. Never. 6 Q. I just want to make sure I'm clear on 7 this. You talked earlier about the British 8 asbestos regulations and this threshold limit value 9 of 5 million particles of asbestos dust per cubic 10 foot in factories and mills; right? 11 A. Yes. 12 Q. That goes all the way back to the 1930s? 13 A. Probably did, yes. It was in force 14 whilst I was operating in the U.K. 15 Q. That applied to all asbestos; that 16 didn't exempt Union Carbide Calidria asbestos? 17 A. It was a general asbestos regulation. 18 Q. Right. And you understood that Union 19 Carbide Calidria was a kind of asbestos; right? 20 A. Yes. 21 Q. And you understood that that regulation 22 in England applied to Union Carbide asbestos just 23 like any other asbestos? 24 A. Yes. 25 Q. It didn't allow, for instance, that
215 1 Sayers 2 Q. Because I think you said in your report 3 that that came out of an asbestos regulation in 4 England that went back all the way to the 1930s. 5 A. Yes, that's right. 6 Q. So that regulation was certainly in 7 effect at the time that you were calling on these 8 customers in 1965 and '66; wasn't it? 9 A. Yes, it was. Don't forget, it was in 10 the report as well, toxicology report. 11 Q. Right. 12 Do you remember when you gave a copy of 13 your report entitled "Asbestos as a Health Hazard 14 in the United Kingdom" to Mr. Woolery whether he 15 then incorporated that into any of his written 16 materials? 17 A. I have no idea whether he did or he 18 didn't. 19 Q. Did you ever see anything from 20 Mr. Woolery, written or authored by Mr. Woolery, 21 that contained a copy of your report entitled 22 "Asbestos as a Health Hazard in the United 23 Kingdom"? 24 A. No, I didn't. 25 Q. Did you see anything written or authored	217 1 Sayers 2 workers could breathe more Union Carbide asbestos 3 than other kinds of asbestos, did it? 4 A. No. 5 Q. And it didn't say that they could 6 breathe more chrysotile than, for example, 7 crocidolite, did it? 8 A. No. It wasn't that detailed. 9 Q. So it didn't set any differentiation or 10 lower limit for crocidolite or amosite or any other 11 kind of asbestos than chrysotile? 12 A. It was asbestos. 13 Q. Right, they were all lumped together? 14 A. Yes. 15 Q. This was, you told us, something put out 16 by the government in England? 17 A. Yes. The factory inspector, which was a 18 government organization. 19 Q. And that's something that we're not 20 familiar with that term in the United States, but 21 the factory inspector, that's an organization by 22 the English government that's meant to protect 23 workers from various hazards in factories? 24 A. That's correct. 25 Q. Now, I'm looking at your report, and I