

Sayers

- 1 that are more harmful than the larger particles,
2 anything like that?
3 A. There were clearly references to that in
4 some of the literature, yes.
5 Q. Did some of the literature that you
6 review involve animal studies?
7 A. Almost certainly, yes.
8 Q. Was there anything about the animal
9 studies that you picked up on that caused you to
10 disregard those studies?
11 A. It's too long ago to remember the
12 details.
13 Q. Were you under the impression when you
14 started at Union Carbide that this product was
15 pelletized for purposes of keeping dust to a
16 minimum?
17 A. Two purposes: to minimize the freight
18 rate and also to minimize dust.
19 Q. Who told you that?
20 A. I think I just absorbed it as general
21 knowledge.
22 Q. Did Dr. Hall ever tell you that?
23 A. My involvement with Dr. Hall was two
24 years down the track.
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- 1 A. Yes.
2 Q. You understood that it was sanded also?
3 A. Yes.
4 Q. You understood that on occasion it was
5 punched; correct?
6 A. Yes.
7 Q. Did you know that those processes
8 created dust?
9 A. Yes.
10 Q. Do you have any information that leads
11 you one way or another to believe that the
12 pelletized asbestos was any less dusty during those
13 processes than open fiber?
14 A. No, because liberation had taken place
15 at the commencement of the process.
16 Q. Thank you.
17 Can you tell me the first time that
18 Union Carbide ever put any type of warning language
19 on any of the containers of Union Carbide asbestos?
20 A. During my day they hadn't.
21 Q. Do you know -- again, after the fact, do
22 you know when that was first done?
23 A. No, I don't.
24 Q. Can you imagine, based on your
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- 1 Q. Let me ask you this: Is it possible
2 that Union Carbide's internal position or the
3 understanding that you came to that one of the
4 reasons for pelletizing this product was to
5 minimize the dust, do you believe that it's
6 possible that that was an afterthought?
7 MR. WILL: Objection, speculation.
8 A. I have no idea.
9 Q. No idea. Okay.
10 Would you agree with me that whether
11 it's pelletized or in open form would have little
12 difference once the particular process had been
13 completed, either in the papermaking or board or
14 ceiling tile making process when it came to
15 sanding, cutting, punching and otherwise
16 manipulating the final product?
17 A. Well, in paper per se the chances of
18 release of material was very low in paper.
19 Q. All right. Let's exclude paper, then.
20 Let's just talk about ceiling tile and ceiling
21 board; okay? Did you understand that the ceiling
22 board and ceiling tile was cut afterwards?
23 A. I'm familiar with that process.
24 Q. You understand the process.
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- 1 education, training and experience, of any reason,
2 possible reason, for Union Carbide to have put any
3 warning on any of the containers of Calidria
4 asbestos prior to the time that you left Union
5 Carbide?
6 A. Reason why?
7 Q. No, can you think of any reason why
8 Union Carbide should have put a warning on any
9 container of Calidria asbestos before you left in
10 1969?
11 A. That's a subjective question.
12 Q. Yes, it is, and I want your subjective
13 answer, please.
14 A. That was really up to the managers
15 involved.
16 Q. I understand that.
17 If you were being exposed to Calidria
18 asbestos in 1969 on a daily basis in a ceiling tile
19 plant, would you have appreciated knowing
20 information that was consistent with your 1967
21 report?
22 MR. WILL: Object to the form of the
23 question.
24 Q. If you were the one being exposed.
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