

1 about our actual knowledge.

2 The Berlin plant was checked many years ago
3 by a company industrial hygienist and adequate dust
4 collection systems were installed at all cutting and
5 grinding stations.

6 The dust count, going back to that TLV
7 thing, at these equipment positions have been
8 maintained and meets the checks made periodically by
9 the State of New Jersey industrial hygienists with
10 their Bureau of Public Health.

11 In 20 years, this goes to our knowledge,
12 there has never been a case of asbestosis or silicosis
13 among all of the employees of the Berlin plant.

14 So that is what is happening in 1966. No
15 one has ever gotten sick.

16 These are the people who aren't end users
17 who work with an occasional piece. These people
18 aren't bystanders like Mr. Vandergucht who may have
19 worked around some pipecovering.

20 These are people who actually manufacture it
21 24 hours a day. They bring in raw asbestos.