

1 Sayers
 2 when they were dumping the contents of the bags?
 3 A. When asked, we did recommend that masks
 4 be worn for that small period of time.
 5 Q. But if nobody asked you, then you
 6 wouldn't recommend it?
 7 A. For the pelletized version, no.
 8 Q. So in other words if you were standing
 9 at a paper mill in England in 1965 and '66 and
 10 watching an employee dump a bag of pellets into a
 11 hydropulper, you wouldn't volunteer on your own:
 12 Hey, he should be wearing a mask?
 13 A. No, not in those days.
 14 Q. Just so I'm clear, do you ever remember
 15 anyone asking you on those occasions in those days
 16 whether they ought to wear masks when they were
 17 dumping the pellets into the hydropulpers?
 18 A. The shop floor worker, you mean?
 19 Q. Yes.
 20 A. Not to the best of my recollection, but
 21 it is a long time ago.
 22 Q. Right. How about any of the management
 23 people at those paper mills, did they ever ask you
 24 whether the workers should wear masks when dumping
 25 pellets?

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 2 A. This topic was discussed with a number
 3 of managers; and when asked, the recommendation was
 4 made.
 5 Q. Just so I'm clear, would you recommend
 6 that they wear masks when they were dumping pellets
 7 or just when they were dumping non-pelletized?
 8 A. There was no question of dumping
 9 non-pelletized. It didn't exist in those early
 10 days. So it was purely pelletized.
 11 Q. So I'm clear, what was your
 12 recommendation with respect to wearing of masks
 13 when dumping pellets?
 14 A. When asked -- don't forget we had the
 15 Dernehl report that we were issued -- it was
 16 reinforced that a respirator was an ideal
 17 protection device to wear.
 18 Q. If asked, would you say that it was
 19 required that respirators be worn?
 20 A. No. The reason for that was looking at
 21 the amount of fibrous material in the air, it was
 22 very, very low, because they were pellets going.
 23 Q. Yes. So when you would stand there,
 24 observing people dumping Union Carbide asbestos
 25 pellets into hydropulpers, you didn't see a lot of

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 2 dust yourself?
 3 A. No, I did not.
 4 Q. So you thought that was a particularly
 5 dusty operation?
 6 A. That's right.
 7 Q. That's why you would not have, if asked,
 8 stated that respirators or masks would be required?
 9 A. Yes.
 10 Q. Now, on those occasions when you visited
 11 paper mills in England in 1965, '66, did you ever
 12 see the pallets of bags of Union Carbide asbestos
 13 being unloaded off of trains, train cars?
 14 A. No, because they were never in train
 15 cars.
 16 Q. How did they arrive at those paper
 17 mills?
 18 A. They arrived with bags on pallets with
 19 the cardboard cover on top.
 20 Q. Would they come what, by truck or how
 21 would they get to the mill?
 22 A. Usually by truck, because at that period
 23 of time we were mainly conducting trials.
 24 Therefore we were looking at a ton or so of
 25 material.

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 2 Q. Okay. So just so we're clear, when you
 3 say you were conducting trials, they were just
 4 doing little trial runs of using the asbestos?
 5 A. That's right.
 6 Q. This was not full-scale production?
 7 A. Later on there were some consistent
 8 customers, but predominantly it was still in the
 9 trial vogue.
 10 Q. Did there come a time ever that you can
 11 recall where a directive was issued by Union
 12 Carbide that all of its papermaking customers in
 13 England should require all of their employees
 14 working in paper mills where Union Carbide asbestos
 15 was being used to wear respirators?
 16 A. I think there was a directive issued,
 17 but I'm a bit vague about that.
 18 Q. I just want to be clear here. Was the
 19 directive directed to everybody in the mill or just
 20 people dumping bags?
 21 A. There was a papermaking association to
 22 which the various mills belonged. At one point I
 23 think there was a discussion document issued by
 24 that said organization.
 25 Q. By that organization?