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Jeff Eddy, Esquire
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Dear Jeff,

Enclosed, please find an article which is exerpted from the February, 1948 addition of the National Safety News magazine, put out by the National Safety Council. The article is entitled "Fume and Dust Exposure" by one V. J. Castrop, who was the Assistant Head of the Industrial Hygiene Division of the General Motors Research Laboratories. I believe that this article is interesting with regard to its approach to threshold limit values generally, and I believe it will be particularly useful considering the fact that General Motors has become a viable defendant in the railroad cases because of the fact that there Electro-Motive Division supplied diesel locomotives to all of our defendant railroads repleat with asbestos packings, gaskets and pipe wrapping. You may also recall that Dr. Frank Weir, who is becoming the Resident Industrial Hygiene Expert for the railroads on a national basis, also worked for General Motors Corporation in the 1960's. He has testified in the past that industrial hygiene was "virtually in its infancy" in the 1930's and 40's, and has inferred that the railroads were quite reasonable in not having industrial hygienist on staff at that time. It would certainly seem that his old employer, General Motors, had the awareness to have an entire Industrial Hygiene Department.

I am attempting to do some research to determine the relative size of General Motors Corporation during this time period. It is my belief that some of the larger railroads, such as the Union Pacific probably employed as many, if not more employees back in the 1940's then did General Motors. Please keep this article in mind for use in the Burlington cases, where General Motors is now a defendant. You may also want to show this article to Tom Hart, for his involvement in the brake lining cases (see page 79).

Please remember that the discovery cutoff in the Ward and DeHague cases is coming up on May 1. You may want to go ahead and notice some corporate depositions as soon as possible. Please give me a call on this.

Sincerely,

John D. Roven

JDR/hak
Enclosures