

- (f) Describe the nature of any action to eliminate or minimize inhalation of asbestos dust or asbestos fibers undertaken as a result of said study;
- (g) Identify any and all documents referring to, relating to or reflecting said study or the results thereof; and
- (h) Identify any and all persons receiving a copy of any document referring to, relating to or reflecting the results or conclusions of said study.

ANSWER: Honeywell incorporates by reference its objections and responses to Interrogatory No. 61.

INTERROGATORY NO. 63: Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

ANSWER: Asbestos-containing friction products manufactured by Honeywell contain processed chrysotile asbestos fibers that are encapsulated or locked into the product itself. Together with various friction modifiers and fillers, the asbestos fibers are bound together with a resin binder system and then baked at a temperature in excess of 350 degrees. Exposure to or the proper use of Honeywell's friction products does not pose a health hazard. Although Honeywell does not believe that there is any health hazard associated with the proper use of its friction products, since 1973, a warning label has been placed on all cartons and boxes of asbestos-containing friction products shipped to customers. In June 1973 Bendix issued General Bulletin G-73-6 to all rebuilders regarding steps necessary to comply with the OSHA regulations, including a statement that "[c]aution labels or lettering should be affixed to any carton or box that may have its contents reground" in conformity with the OSHA language. In