FILE NAME: Chevron (CHV)

DATE: 2007 Sept 25

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DOCUMENT DESCRIPTION: BC Notes on Deposition of Stanley Dryden

This is the deposition of Chevron representative Stanly Dryden who was produced as the PMK about Chevron's historical knowledge of the dangers of asbestos and what Chevron did in response to protect workers. From my memory Dryden testified that:

1. Chevron's historical knowledge of the dangers of asbestos goes back to the 1930's.
2. Dryden was the document custodian at chevron and saw the 1937 Bonsib report in the chevron files when he worked there.
3. Chevron's knowledge that you could avoid dust disease by wearing respirators, insuring proper ventilation and wetting down the product dates back to the 1930s.
4. At some chevron plants respirators were provided and insulation was wet down to avoid asbestos exposure at least by the 1950s. Showers and change of clothing was also available. Each refinery was run autonomously. Thus, some refineries (not ours) took these precautionary steps while others did not.
5. When asked why chevron required that a 1973 document complaining of a poor safety record at chevron was required to be returned the witness said " so it would not turn up in a case like this in 2007."
6. He wished chevron would have told him about the danger of getting cancer from asbestos exposure.
7. TLV did not offer complete protection . it was known that people exposed below tlv could get sick.
8. It would only have cost chevron 10 cents per day to pay for laundering of clothing that would have prevented my client from getting sick
9. Extensive testimony on duty to protect workers and their families.

(C. Placitella, Oct. 20, 2007)