

46 1 Sayers 2 MR. LANIER: Objection to form. 3 MR. BROWNSON: Leading. 4 A. Yes. 5 Q. Let me rephrase the question. 6 Mr. Sayers, did the refusal that you 7 referenced, the refusal of the dockers to handle 8 asbestos that you reference at page 6 of your 9 report, did that involve a shipment of Union 10 Carbide asbestos? 11 A. No, it did not. 12 Q. Did you ever have a meeting yourself 13 with the dockers? 14 A. Yes. I attended one meeting with Peter 15 Cheston, my boss, and Reg Sly, the shipping manager 16 of Union Carbide in London. 17 Q. What was discussed with the dockers at 18 that time? 19 A. It was really an explanation as to what 20 form our asbestos arrived in, namely pellets, and 21 also how it was packaged. It was -- favor had been 22 received by the union representatives. 23 Q. How was the Union Carbide asbestos 24 packaged? 25 A. It was packaged in brown kraft bags that	48 1 Sayers 2 Q. Then at page 5 you talk about "The 3 Ministry of Labour is now actively engaged in 4 formulating a new code of regulations"; is that 5 correct? 6 A. Yes, that's right. 7 Q. Then over at page 16 you describe some 8 information of Dr. Taylor -- 9 A. Yes. 10 Q. -- you acquired. 11 When you wrote your report in May of 12 1967, did you have an opinion, a personal opinion, 13 on whether the threshold limit value of 5 million 14 particles per cubic foot was correct or incorrect? 15 MR. LANIER: Objection to form. 16 A. I was incompetent to make that 17 judgment. 18 MR. BROWNSON: Objection to form. 19 Q. So did you have a personal opinion? 20 A. No. 21 Q. In your report at page 16 -- well, back 22 up a second. If you didn't think you were 23 competent to form an opinion, why did you put this 24 information in the report? 25 MR. LANIER: Objection to form.
47 1 Sayers 2 were sealed. 3 Q. What was done with the kraft bags? 4 A. When the contents of the bag was entered 5 into the hydropulper -- 6 Q. No, we're talking about shipping, how it 7 was shipped. 8 A. They were put onto pallets, wooden 9 pallets. 10 Q. Then what was done with the wooden 11 pallets? 12 A. For small quantities they were shipped 13 over on wooden pallets but with a cardboard cover 14 on top, so in effect it was a box. 15 Q. What about larger shipments? 16 A. They were put into metal containers. 17 Q. Now, in your report you identify some 18 issues about the threshold limit value; is that 19 correct? 20 A. Yes. 21 Q. And at page 4 at the bottom of the page, 22 you talk about factories at present being governed 23 by outmoded asbestos regulations promulgated in 24 1931. 25 A. Yes.	49 1 Sayers 2 A. Because I thought that Dr. Demehl 3 should be aware of what was pertaining in the U.K. 4 Q. And at page 16 of your report, you 5 state, "An indication of the present opinion on 6 this matter held by Union Carbide's toxicology 7 department would be most welcome"; correct? 8 A. That is right. 9 Q. What were you asking there? 10 A. For an assessment of the content of the 11 report to see whether a learned opinion, a medical 12 opinion, was in agreement. 13 Q. You were looking for Dr. Demehl to give 14 you some guidance? 15 MR. LANIER: Objection. 16 MR. BROWNSON: Objection. 17 A. Yes, that is right. 18 Q. Did you know in May of 1967 what the new 19 limit would be that was adopted in England? 20 A. No, I didn't. There were some 21 suggestions, but there was nothing definitive. 22 Q. In your discussions with people and in 23 the articles that you read, was anybody saying to 24 you or suggesting to you that asbestos ought to be 25 banned from factories?