

FILE NAME: Chrysler (CHR)

DATE: 1992 Sept 4

DOC#: CHR089

DOCUMENT DESCRIPTION: Legal - Deposition of William Watt with
Attached Memo - 1986 Feb 5

AFFIDAVIT OF WILLIAM WATT

STATE OF MICHIGAN)
)ss
COUNTY OF WAYNE)

William Watt, being first duly sworn on oath, deposes and states:

1. I am a Manager of the Industrial Hygiene and Toxicology Department at Chrysler Corporation and I am authorized to make this Affidavit on its behalf.

2. As used in the Affidavit, the term "toxic" refers to a chemical's capacity to cause injury to humans. The term "hazard" refers to the possibility or probability that injury to employees may result from the handling or use of asbestos under certain conditions.

3. I am informed and believe that during the time period from October 1, 1978 to February 5, 1986, Chrysler Corporation ("Chrysler"), purchased from the defendants A.T. Callas and Alma Products a product called "Calidria", as indicated by the attached Exhibit 1, letter of Fred Roskopp, dated February 5, 1986. Calidria contained asbestos and was used as a thixotropic agent for automotive sealants at the Chrysler Chemical Plant.

4. I have been assigned to the Industrial Hygiene and Toxicology Department during the period of August, 1977 to the present.

5. The Industrial Hygiene and Toxicology Department was responsible for anticipating, recognizing, evaluating and

recommending procedures to control environmental factors or stresses that could cause injury to or impair the health of Chrysler employees who worked in the company's production facilities. Prior to and since October 1, 1978, Chrysler employed numerous industrial hygienists, toxicologists, medical personnel, and other employees with similar functions, whose responsibilities included the evaluation and prevention of potential health hazards associated with the use of chemicals including asbestos, in the workplace, including the Chrysler Chemical Plant.

6. At least since October 1, 1978, one category of environmental factors of primary concern to Chrysler was chemicals, including asbestos, used in the production process, because the company recognized that hazards to its employees could arise as a result of over exposure to toxic substances used in the production process.

7. As part of its evaluation of the potential health hazards associated with the use of asbestos in its facilities during the October 1, 1978 to February 5, 1986 time period, Chrysler employees assigned to the Industrial Hygiene and Toxicology Department routinely reviewed literature concerning asbestos' toxic properties and potential hazards, and the methods and practices necessary to safeguard employees from such potential hazards.

8. Based upon their evaluation of the workplace environment at Chrysler's production facilities, including the Chrysler Chemical Plant, and their review of pertinent literature, attendance at various seminars and programs, and their own

training and education, prior to October 1, 1978, Chrysler's industrial hygienists and toxicologists knew of asbestos' toxic properties and the potential hazards associated with the use of asbestos. Chrysler knew that asbestos was a toxic substance that posed a potential hazard in the event that its employees inhaled particulate matter (i.e., dusts), that contained asbestos. Chrysler had this knowledge prior to and during the October 1, 1978 to February 5, 1986 time period and utilized its knowledge in an effort to eliminate the hazards posed by worker exposure to asbestos through the use of certain engineering controls, including designing its production machinery to control the airborne concentration of asbestos and properly maintaining its production machinery. Chrysler also attempted to eliminate the hazards posed by worker exposure to asbestos by requiring certain general control methods, including the following:

- a. implementing procedures intended to minimize employee exposure to asbestos;
- b. utilizing general and local exhaust and ventilation systems intended to remove from the work environment potentially hazardous levels of toxic materials, including asbestos;
- c. providing respiratory and other protection for its employees;
- d. implementing housekeeping rules intended to minimize employee exposure to asbestos;
- e. utilizing medical screening, surveillance programs, and pulmonary function testing of employees working in or near areas utilizing asbestos, and a medical screening program intended to prevent employees with existing medical problems from being assigned to work areas using;

- f. training and educating supervisors and workers concerning the potential hazards associated with exposure to asbestos; and
- g. routinely conducting industrial hygiene surveys.

9. Chrysler is in compliance with the Federal Hazard Communication Act which was designed to inform employees of the potential hazards of exposure to potentially hazardous materials such as asbestos and the precautions necessary to prevent such hazards.

10. Prior to and during the period October 1, 1978 to February 5, 1986 Chrysler conducted air monitoring studies at the Chrysler Chemical Plant. The purpose of such studies was to measure the levels, if any, of asbestos present in the ambient air in various work areas.

11. As evidenced by the foregoing, prior to and during the period October 1, 1978 to February 5, 1986, Chrysler knew that asbestos was a toxic chemical that posed potential hazards to its employees and took affirmative steps to protect its employees from such hazards, including review of available literature, implementation of engineering systems to control the potential for exposure to asbestos, instituting medical screening and surveillance programs, developing and disseminating safety literature to management and employees, and performing routine air monitoring to protect employees from overexposure to asbestos.

12. This Affidavit is based upon my personal knowledge and my review of Chrysler Corporation's records. If I am sworn

as a witness, I can testify competently to the facts contained herein.

William Watt
William Watt
Manager of the Industrial Hygiene
and Toxicology Department,
Chrysler Corporation

Sworn to and subscribed to before me
this 15th day of April, 1992:

Barrie M. Jackson
Notary Public
Wayne County, Michigan
My Commission Expires: 9-4-94

WISC & MARSHALL, P.C., 11511 PLOOM BLVD, SUITE 200, DETROIT, MICHIGAN 48226 (313) 961-0000

February 5, 1986

Joseph V. Brennan, Esquire
SULLIVAN, WARD & BONE
220 W. Congress - 5th Floor
Detroit, MI 48226

Re: ASBESTOS SUPPLIERS TO CHRYSLER CORPORATION

Dear Joe:

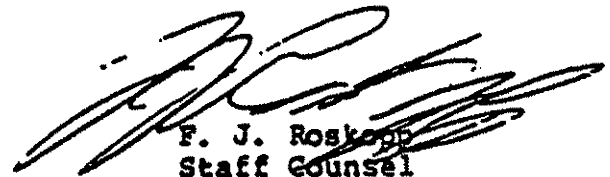
The following list of data designates the part number, supplier's, and time period in which Chrysler Chemical purchased Asbestos:

<u>PRODUCT IDENTIFICATION</u>	<u>CHRYSLER SUPPLIER</u>	<u>CHRYSLER'S BASE TIME PERIOD</u>
F445 Asbestos 7D	Asbestos Corp. Ltd.	10-1-67 to 8-1-7
F448 Asbestos 5K04	International Fibers Manville Bldg. Materials J.M Asbestos Sales	6-1-59 to 1-1-80 1-1-80 to 4-1-84 4-1-84 to Present
F1423 RG244	Union Carbide Metals Div. A.T. Callas Alma Products	10-1-70 to 10-1- 10-1-78 to 1-1-8 1-1-86 to Present
E1488 RG144	Union Carbide Metals Div. A.T. Callas Alma Products	10-1-70 to 10-1- 10-1-78 to 1-1-8 1-1-86 to Present

I have also been advised that there is an additional firm which Chrysler did purchase Asbestos from, that firm's name is Boehle Chemical Inc.

If we can be of any further assistance, please don't ask.

Very truly yours,


F. J. Roskopp
Staff Counsel

FJR/26/las