

1 CHEAPER MATERIALS ELSEWHERE.

2 Q OKAY.

3 A IT'S A 55 MILE ROAD TRIP FROM THE MINE TO THE MILL.

4 Q YOUR MINE IS ISOLATED, I TAKE IT?

5 A YES.

6 Q SO YOU DON'T MARKET THE SERPENTINE ROCK?

7 A NO.

8 Q OKAY.

9 A THE ORE THAT HAS BEEN SCREENED IS HAULED DOWN TO THE
10 MILL EVERY YEAR, AS DR. HYDE SAID, DURING THE DRY
11 SEASON, WHICH WE USUALLY START HAULING IN MAY AND QUIT
12 HAULING IN OCTOBER. FROM OCTOBER TO MAY, THERE'S TOO
13 MUCH RAIN AND SNOW. THE DEPOSIT IS ABOUT 4,000 FEET
14 ELEVATION. THE MILL IS ABOUT 200 FEET.

15 Q ARE THESE DIRT ROAD, LOGGING ROADS TYPE OF THINGS?

16 A NO, THEY ARE ALL PAVED NOW SO THAT WE DON'T HAVE TO
17 REBUILD THEM EVERY YEAR. WE USED TO HAVE TO REBUILD
18 THE ROADS EVERY YEAR. PART OF IT IS UNION CARBIDE
19 OWNED ROADS AND PART OF IT IS STATE HIGHWAY -- COUNTY
20 HIGHWAY ROADS.

21 THE ORE IS HAULED DOWN ALSO BY SUBCONTRACTORS
22 AND DEPOSITED AT THE PLANT.

23 Q THE TRUCKS ARE NOT UNION CARBIDE'S?

24 A NO. THE MINING AND THE HAULING ARE ALL SUBCONTRACT
25 WORK. THAT'S WHY WE ONLY HAVE -- THE TWO MEN AT OUR

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1 MINE ARE THERE ONLY DURING THE MAY TO OCTOBER HAULING
2 SEASON, DOING THE SCREENING AND GUIDING THE WORK THAT
3 IS GOING ON UP THERE.

4 Q HOW MANY OTHER PEOPLE ARE INVOLVED IN THAT MINING
5 OPERATION AMONG THE SUBCONTRACTORS?

6 A I KNOW THE TRUCK HAULERS WOULD INVOLVE ABOUT SIX TO
7 EIGHT DRIVERS DEPENDING ON HOW MUCH WE ARE GOING TO
8 HAUL IN A SEASON. MINING OPERATION, I REALLY DON'T
9 KNOW, I WOULD GUESS A HALF A DOZEN OR LESS, A MODEST,
10 VERY SMALL NUMBER PROBABLY FROM WHAT YOU WOULD THINK.

11 Q YOU'RE TALKING ABOUT 15 TOTAL PEOPLE INVOLVED IN THE
12 MINING AND HAULING OF IT?

13 A COUNTING OUR PEOPLE, YES.

14 THAT TAKES CARE OF THE MINE.

15 Q OKAY. AND THEN IT IS HAULED INTO THE MILL?

16 A INTO THE MILL, WHICH IS NEAR -- ABOUT FIVE MILES SOUTH
17 OF KING CITY.

18 Q OKAY. WHERE IS THE ASBESTOS STORED WHEN IT'S FIRST
19 TAKEN TO THE MILL?

20 A STORED ON THE GROUND OUTSIDE.

21 Q AND HOW MUCH DO YOU HAVE STORED THERE AT ANY ONE TIME.
22 OR ABOUT HOW MUCH WOULD YOU STORE THERE, LET'S SAY,
23 AT THE END OF OCTOBER?

24 A ENOUGH TO OPERATE UNTIL THE NEXT DRY SEASON, WHICH WOULD
25 BE 10 TO 20 THOUSAND TONS, MAYBE 30,000.

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1 Q OKAY.

2 AND DESCRIBE THE PROCESS OF MILLING THE ASBESTOS.

3 A ALL RIGHT. THE ORE, WHICH AT THIS POINT IS ALL LESS
4 THAN ONE INCH BUT IT STILL HAS THE LESS THAN ONE INCH
5 SIZE ROCKS IN IT, IS SLURRIED AND FED INTO, OR SLURRIED
6 AS IT'S FED INTO THE PLANT, AND THE OPERATION IS A WET
7 SLURRY OPERATION UP THROUGH THE DRYING STEP.

8 Q OKAY. HOW DOES THE ASBESTOS GET FROM OUTSIDE INTO THE
9 SLURRY?

10 A JUST STARTING A FEW MONTHS AGO, WE HAVE INSTALLED A
11 SLURRY FEED SYSTEM. THE ASBESTOS IS DUMPED INTO A TANK
12 BUILT INTO THE GROUND AND KEPT STIRRED UP WITH WATER
13 AND IT IS PUMPED INTO THE PLANT.

14 Q HOW IS IT DUMPED INTO THAT TANK?

15 A WITH A FRONT-END LOADER.

16 Q OKAY. AND BEFORE THAT, LET'S TALK ABOUT BACK IN '63
17 WHEN YOU OPENED UP THE PLANT, HOW DID YOU FEED IT THEN?

18 A THE FRONT-END LOADER DUMPED THE ORE ON THE CONVEYOR
19 BELT AND IT WAS CARRIED INTO THE MILL BUILDING WHICH
20 IS WHEN IT WAS MIXED WITH WATER.

21 Q OKAY. AND THIS MIX, THE ROCK AND THE ASBESTOS ALL
22 TOGETHER IS MIXED WITH WATER?

23 A UH-HUH.

24 Q OKAY. NOW, THIS IS NOT LIKE A DOUGH, A CAKE DOUGH THAT
25 YOU SEE, BUT IT'S LIKE A -- HOW WOULD YOU DESCRIBE IT?

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1 A WELL, IT WOULD BE LIKE MIXING ROCKS AND SAND OR ROCKS
2 AND MUD.
3 Q OKAY.
4 A MORE LIKE A CONCRETE EXCEPT THIN ENOUGH TO PUMP.
5 Q LIKE DIGGING SAND OFF OF THE BOTTOM OF A LAKE OR SOME-
6 THING LIKE THAT?
7 A WELL, I WOULD SAY MORE LIKE CONCRETE, BECAUSE IN A
8 CONCRETE MIX YOU HAVE ROCKS, YOU HAVE PORTLAND CEMENT.
9 Q YOU'RE TALKING ABOUT WET CONCRETE BEFORE IT HARDENS?
10 A OH, YES, BUT A VERY THIN -- A SLURRY THAT'S THIN ENOUGH
11 TO PUMP.
12 Q UH-HUH. AND THEN THIS SLURRY ITSELF IS ACTUALLY RUN
13 THROUGH THE CRUSHER?
14 A WELL, THERE ISN'T ANY REALLY CRUSHER. WE DO HAVE WET
15 GRINDING MILLS. WE DON'T HAVE CRUSHERS PER SE. AGAIN,
16 WHAT YOU WOULD THINK OF FROM A TYPICAL ORE PROCESSING
17 SYSTEM OF PROCESSING ROCK. WE DON'T CARE ABOUT THE
18 ROCK, ALL WE WANT TO DO IS SEPARATE THE FLAKES AND
19 BUNDLES OF FIBERS INTO INDIVIDUAL FIBERS.
20 Q OKAY.
21 A MOST OF THE ROCK -- WE DON'T ATTEMPT TO CRUSH THE ROCK,
22 THIS LESS THAN ONE INCH ROCK, THAT IS ALL TAKEN OUT
23 AS TAILINGS.
24 Q OKAY. I MIGHT HAVE GOTTEN YOU OUT OF ORDER. JUST
25 DESCRIBE TO ME, WHEN THE ASBESTOS OR MIXTURE GOES INTO

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1 THE SLURRY, INTO THE WATER, DESCRIBE TO ME THE PROCESS
2 OR ROUTE IT TAKES BEFORE IT COMES OUT IN EITHER FIBROUS
3 OR PELLET FORM.

4 A ALL RIGHT. IT GOES THROUGH SOME VERY TYPICAL ORE
5 BENEFICIATION SYSTEM SUCH AS GRAVITY SEPARATION. IN
6 OTHER WORDS, WE ARE TRYING TO GET RID OF THE ROCK,
7 WE DON'T WANT ANY PART OF THAT INTO THE FINAL PRODUCT.

8 Q THIS IS ALL STILL WHILE IT'S IN THE SLURRY?

9 A OH, YES. THE FIRST PART OF THE OPERATION IS ALL PER-
10 TAINING TO GRAVITY TYPE SEPARATION TO TAKE THE ROCK
11 OUT. IT ALSO GOES THROUGH HYDROCLONES, ANOTHER WAY
12 TO TAKE ROCK OUT.

13 Q DOES THAT INVOLVE A CHEMICAL PROCESS?

14 A NO, IT IS ALL WATER.

15 Q WHAT IS A HYDROCLONE?

16 A IT'S A CYCLONE.

17 Q WHIRLPOOL?

18 A EXCEPT IT'S WATER -- I MEAN IT'S WET. AN AIR CYCLONE
19 FOR SEPARATING LIGHT MATERIALS FROM HEAVY MATERIALS,
20 BUT THIS IS CALLED A HYDROCLONE BECAUSE WE'RE USING
21 IT AS A SLURRY.

22 THE SLURRY IS ALSO PASSED THROUGH, AS I SAY, A
23 WET GRINDING MILLS MERELY TO BREAK UP THESE BUNDLES.

24 (SHORT RECESS.)

25

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1 BY MR. HART:

2 Q GO AHEAD.

3 A AFTER WE'VE DONE ALL OF THIS WET PROCESSING, THEN WE
4 DEWATER THE SLURRY WITH THE PLATE AND FRAME FILTER
5 PRESSES, AS DR. HYDE MENTIONED, WHICH GIVES US A CAKE,
6 FILTER CAKE.

7 Q SO, AS I UNDERSTAND IT, FIRST YOU GET RID OF ALL THE
8 SERPENTINE ROCK. WHEN YOU HAVE ONLY ASBESTOS LEFT,
9 THE CALIDRIA ASBESTOS, YOU PUT IT THROUGH THE FIBER
10 SEPARATORS?

11 A GRINDING MILLS AND FIBER -- ANYTHING THAT WILL BREAK
12 UP THE BUNDLES. IT'S DIFFERENT PROCESSES.

13 Q HOW MANY STEPS DOES THAT INVOLVE, THE BREAKING-UP STEPS?

14 A OH, PROBABLY THREE OR FOUR.

15 Q AND ARE THE FIBERS THEMSELVES ACTUALLY BROKEN DOWN TOO?

16 A NO, I THINK THE FIBERS ARE JUST AS SHORT AS THEY ARE
17 IN NATURE FIBRILES. WE DON'T BREAK THEM FROM ANYTHING
18 WE DO TO THEM. CHRYSOTILE IS A VERY SOFT FIBER AND
19 WHEN IT'S ALREADY SHORT, AT LEAST AS SHORT AS WE HAVE
20 IT, IT DOESN'T BREAK UP ANYMORE.

21 AFTER THE PLATE AND FRAME FILTER PRESSES WHICH
22 REMOVES ABOUT HALF OF THE WATER WHICH WE PUT IN, IT
23 COMES OUT OF THE PRESSES AS A CAKE, SOMETHING LIKE THE
24 CONSISTENCY OF PLAY DOUGH. THE SYSTEM HAS BEEN CON-
25 TINUOUS AND STARTING WITH THIS, YOU HAVE A BATCH PROCESS.

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1 Q LET ME STOP AND ASK YOU. FROM THE TIME THAT THE
2 ASBESTOS IS DUMPED INTO THE TUB OUTSIDE OR WHATEVER
3 YOU CALL IT BY THE FRONT-END LOADER, THE TIME IT COMES
4 OUT AS A PLAY DOUGH, ARE HUMANS EXPOSED TO IT AT ALL?
5 A YES.
6 Q HOW ARE THEY EXPOSED?
7 A THE PEOPLE THAT ARE DOING THE OPERATIONS.
8 Q OKAY. NOW, THE ASBESTOS AS IT PASSES THROUGH ALL THESE
9 CHANNELS YOU'VE DESCRIBED, IS IT IN A CLOSED SYSTEM
10 OR AN OPEN SYSTEM? I TAKE IT FROM WHAT YOU SAID
11 THAT IT'S OPEN.
12 A GENERALLY OPEN.
13 Q OKAY. GO AHEAD.
14 A THE FILTER CAKE IS FED INTO AN EXTRUDER FROM WHICH IT
15 IS EXTRUDED INTO THE SHAPE OF PELLETS, ACTUALLY LIKE
16 SPAGHETTI, BUT THE STRINGS BREAK OFF DIRECTLY INTO A
17 ROTARY DRIER.
18 Q UH-HUH. AN EXTRUDER THEN, TO EXPLAIN IT TO A JURY,
19 WOULD BE PUTTING IT IN LIKE A GRINDER?
20 A LIKE A SAUSAGE GRINDER.
21 Q LIKE A SAUSAGE GRINDER.
22 A UH-HUH
23 Q COMING OUT IN LONG PELLET SHAPE THINGS?
24 A STRINGS WHICH BREAK OFF IMMEDIATELY INTO PELLETS, WHICH
25 WHEN THEY ARE WET ARE ABOUT HALF AN INCH IN DIAMETER

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- 1 AND THREE-QUARTERS OF AN INCH LONG.
- 2 Q ALL RIGHT.
- 3 A STILL CONTAINING ABOUT 50 PERCENT WATER. FED INTO THE
- 4 ROTARY DRYER AND TAKEN OUT OF THE OTHER END OF THE DRYER
- 5 AS DRIED PELLETS.
- 6 Q OKAY. THE ROTARY DRYER, IS IT LIKE A CLOTHES DRYER?
- 7 IS THAT WHAT YOU MEAN BY ROTARY?
- 8 A YES, UH-HUH.
- 9 Q IT TURNS AROUND AND THE PELLETS TUMBLE AROUND INSIDE?
- 10 A UH-HUH.
- 11 Q DO THEY BREAK UP?
- 12 A NO, THEY SLIDE THROUGH, THEY DON'T GO AROUND LIKE
- 13 CLOTHES IN A DRYER. THEY DON'T TUMBLE AROUND, THEY
- 14 JUST SLIDE AND TUMBLE OVER AMONG THEMSELVES, VERY LITTLE
- 15 ATTRITION.
- 16 Q OKAY. HOW MUCH WATER, OR WHAT'S THE MOISTURE CONTENT
- 17 OF THE PELLETS WHEN THEY GO INTO THE DRYER?
- 18 A ABOUT 50 PERCENT.
- 19 Q WHEN THEY COME OUT, WHAT IS THE MOISTURE CONTENT?
- 20 A HOPEFULLY ZERO.
- 21 Q OH, COMPLETELY DRY?
- 22 A FROM ZERO TO 2 PERCENT IS OUR NORMAL ALLOWABLE MOISTURE
- 23 CONTENT.
- 24 Q OKAY.
- 25 A THE PELLETS THEN CAN BE -- WHICH ARE NOW ABOUT A QUARTER

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1 INCH IN DIAMETER AND HALF AN INCH LONG, THEY SHRUNK
2 BECAUSE OF THE WATER BEING TAKEN OUT. THEY CAN BE
3 FED DIRECTLY INTO BULK HOPPER CARS AND SHIPPED DIRECTLY
4 TO A CUSTOMER. THERE WOULD BE NO PACKAGING INVOLVED.
5 Q OKAY. THE DRYERS, HOW ARE THESE PELLETS PUT IN THE
6 DRYER?
7 A DIRECTLY OUT OF THE EXTRUDER. THE EXTRUDER -- THE
8 MATERIAL COMING OUT OF THE EXTRUDER FALLS RIGHT INTO
9 THE DRYER. THERE IS A CLOSED SYSTEM AT THAT POINT.
10 Q AND IT'S NOT TOUCHED BY HUMANS AT THAT POINT?
11 A NO.
12 Q OKAY. IS IT A COMPLETELY ENCLOSED SYSTEM --
13 A YES.
14 Q -- ON THAT END OF IT?
15 A UH-HUH.
16 Q ON THE OTHER END, WHEN THEY COME OUT OF THE DRYER?
17 A ON THE OTHER END OF THE DRYER, THEY COME OUT AS PELLETS
18 INTO A CONVEYING SYSTEM TO CONVEY THEM UP TO THE TOP
19 OF THE MILL SO THAT THEN THEY CAN BE FED, ESSENTIALLY
20 BY GRAVITY, INTO A -- DIRECTLY INTO A HOPPER CAR.
21 Q IS IT AN OPEN CONVEYOR?
22 A PART OF IT IS OPEN AND PART OF IT IS CLOSED.
23 Q OKAY. HOW DID THE PELLETS GET FROM THE DRYER ONTO THE
24 CONVEYOR?
25 A THEY TUMBLE OUT OF THE END OF THE DRYER DIRECTLY INTO

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- 1 THE CONVEYOR. THAT'S OPEN AT THAT POINT.
- 2 Q OKAY. AND YOU GO FROM THE CONVEYOR TO WHERE?
- 3 A UP. THEY'RE ELEVATED WITH A BUCKET ELEVATOR UP TO-
- 4 HIGHER LEVEL SO THEY CAN THEN BE FED MORE OR LESS BY
- 5 GRAVITY DIRECTLY INTO THE HOPPER CAR AND THEN BE SHIPPED
- 6 DIRECTLY TO A CUSTOMER OR THEY'RE FED INTO BINS FROM
- 7 WHICH THEY CAN BE PACKAGED AS PELLETS FOR CUSTOMERS
- 8 THAT CAN USE THE MATERIALS IN THE PELLET FORM BECAUSE
- 9 IT IS -- IT DOES TAKE SOME ENERGY TO UTILIZE THE PELLET
- 10 INTO A SYSTEM.
- 11 Q WHY ARE THE PELLETS PREFERRED BY SOME CUSTOMERS?
- 12 A EASE OF HANDLING IS A PRIME REASON. OF COURSE, THE
- 13 DUST FROM THE PELLETS IS VERY MINIMAL AS COMPARED TO
- 14 AN OPEN FIBER, USE OF AN OPEN FIBER PRODUCT.
- 15 Q DO SOME OF YOUR CUSTOMERS REQUEST FIBROUS CALIDRIA?
- 16 A SOME OF THEM USE FIBROUS MATERIAL BECAUSE THEY CAN'T
- 17 USE THE PELLETS IN THEIR PARTICULAR SYSTEM.
- 18 Q THEIR SYSTEM IS NOT DESIGNED TO BREAK UP THE PELLETS
- 19 TO USE THEM?
- 20 A THAT'S RIGHT.
- 21 Q NOW, IS THE FIBROUS CALIDRIA THAT YOU SELL, PELLETS
- 22 THAT HAVE BEEN BROKEN UP OR DOES THAT GO THROUGH A
- 23 DIFFERENT PROCESS?
- 24 A NO, THE PELLETS ARE GROUND UP WITH A HAMMER MILL.
- 25 Q OKAY.

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- 1 A AND THEN PACKAGED AS OPEN FIBER.
- 2 Q SO ALL OF THE ASBESTOS IS MADE INTO PELLETS FIRST?
- 3 A YES.
- 4 Q AND THEN PEOPLE WHO WANT TO BUY PELLETS BUY THE DRIED
- 5 PELLETS AND PEOPLE WHO WANT FIBROUS ASBESTOS ACTUALLY
- 6 BUY CRUSHED UP PELLETS?
- 7 A RIGHT.
- 8 Q IN OTHER WORDS, YOU DO THE CRUSHING FOR THEM?
- 9 A RIGHT.
- 10 Q OKAY. NOW, HOW IS THAT CRUSHING DONE?
- 11 A DONE WITH A HAMMER MILL.
- 12 Q AND WHAT IS THAT? DESCRIBE THAT FOR ME, PLEASE.
- 13 A A HAMMER MILL IS A SHELL, INSIDE OF WHICH IS A SHAFT
- 14 ON WHICH ARE SUSPENDED HAMMERS, AND THE SHAFT OPERATES
- 15 AT HIGH SPEED AND THE PELLETS ARE FED INTO THE JACKET
- 16 OF THE EQUIPMENT AND THE HAMMERS GRIND UP THE PELLETS.
- 17 Q BY HAMMERS, YOU DON'T MEAN A CLAW HAMMER?
- 18 A NO, HAMMER SHAPED DEVICES ON THE SHAFT OF THE MILL.
- 19 Q OKAY, AND BECAUSE OF THE SPINNING OF IT MAKES THEM GO
- 20 UP AND DOWN AND KNOCK AGAINST THE PELLETS?
- 21 A THEY GO AROUND AND AROUND.
- 22 Q OKAY. AND IS THIS A CLOSED SYSTEM?
- 23 A YES.
- 24 Q AND THEN WHAT HAPPENS AFTER THEY ARE CRUSHED?
- 25 A AFTER THEY'RE CRUSHED, THEN THEY'RE PACKAGED.

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1 Q HOW DOES IT GET OUT OF THE HAMMER MILL INTO THE AREA
2 TO BE PACKAGED?
3 A BY AN AIR SWEEP THROUGH THE MILL WHICH CARRIES ANY
4 FIBERS THAT ARE GROUND UP LIGHT ENOUGH OR TO THE POINT
5 WHERE WE WANT THEM TO COME OUT, THEY COME OUT BY AIR
6 FLOW INTO ANOTHER STORAGE BIN, AND FROM THAT STORAGE
7 BIN THROUGH PACKAGING EQUIPMENT DEVICE.
8 Q AFTER THE FIBER IS CRUSHED UP, IT IS LIGHT ENOUGH TO
9 BE MOVED ABOUT BY AIR PRESSURE?
10 A YES.
11 Q OKAY. I ASSUME SINCE THE FIBERS ARE SO SMALL THAT
12 THEY ARE VERY LIGHT?
13 A THE DENSITY OF ASBESTOS IS ALWAYS THE SAME.
14 Q I KNOW, BUT THE INDIVIDUAL FIBERS ARE VERY VERY LIGHT?
15 A YES.
16 Q OKAY. AND WHEN THEY'RE BROKEN UP, ARE THEY BROKEN UP
17 INTO INDIVIDUAL PARTICLES BY THE HAMMER MILL?
18 A PROBABLY NOT.
19 Q WHAT SIZE ARE WE TALKING ABOUT WHEN IT COMES OUT OF
20 THERE?
21 A I DON'T REALLY KNOW. IT HAS THE CONSISTENCY OF FACE
22 POWDER. IT DOESN'T LOOK LIKE A FIBER.
23 Q A WOMAN'S FACE POWDER THAT SHE HAS IN HER COMPACT OR
24 SOMETHING LIKE THAT?
25 A YES, UH-HUH.

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1 Q SO IT'S BLOWN BY AIR VACUUM OR AIR PRESSURE --
2 A AIR PRESSURE.
3 Q -- INTO A STORAGE BIN --
4 A YES.
5 Q -- FIRST OF ALL?
6 A UH-HUH.
7 Q AND THEN WHAT DOES IT DO, JUST SITS THERE?
8 A COMES OUT OF THE STORAGE BIN --
9 Q IS THAT A CLOSED STORAGE BIN?
10 A YES, IT'S BASICALLY CLOSED.
11 Q AND DO WORKERS EVER GO IN THERE TO SHOVEL SOME OUT
12 OR MOVE THINGS AROUND?
13 A YES.
14 Q OKAY. SO IT'S A BIG ROOM LIKE IN HERE, COMING IN THE
15 TOP I IMAGINE?
16 A YES.
17 Q AND WHERE DOES IT EXIT FROM THERE?
18 A FROM THE BOTTOM. THE BIN IS -- THE FIBERS ARE KEPT --
19 AGAIN, I DON'T KNOW REALLY -- IT'S CALLED A LIVE-BOTTOM
20 BIN. IN OTHER WORDS, THERE ARE SCREWS GOING THROUGH
21 THE BOTTOM OF THE BIN IN DIFFERENT DIRECTIONS TO KEEP
22 THE MATERIAL FROM KICKING UP SO THAT IT WOULDN'T FLOW
23 OUT.
24 Q OKAY.
25 A AND OUT OF THAT BIN, THEN IT GOES INTO THE DRY BIN

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1 OPERATION.

2 Q IN OTHER WORDS, IT'S KEPT LOOSE WHILE IT'S IN THERE --

3 A UH-HUH.

4 Q -- AS OPPOSED TO LIKE USING POWDER FROM A WOMAN'S

5 COMPACT WHEN IT'S CAKED AND HARD?

6 A YES.

7 Q THIS IS KEPT LOOSE ALL THE TIME SO IT CAN FLOW OUT?

8 A YES. THEN WHEN IT'S PUT IN THE BAG, IT'S PUT IN UNDER

9 AIR PRESSURE AND COMES BACK INTO THE MORE COMPACT FORM

10 OF FACE POWDER.

11 Q OKAY. NOW, IS THE BAGGING OF IT DONE AUTOMATED?

12 A NO. WE HAVE A BAGGER WHO OPERATES THE BAGGING MACHINE.

13 HE DOESN'T SHOVEL IT IN BUT HE OPERATES THE MACHINE.

14 Q HE PUTS THE BAG UNDER THE SPOUT?

15 A HE PUTS THE BAG UNDER THE SPOUT, YES.

16 Q OKAY, AND IT COMES OUT. AND DOES HE TURN THE MACHINE

17 ON AND OFF, DOES HE FILL IT UP AND THEN SHUT IT OFF?

18 A IT'S SUPPOSED TO SHUT OFF WHEN THE BAG HAS THE CORRECT

19 WEIGHT IN IT.

20 Q OKAY.

21 A IT KICKS OFF.

22 Q THEN HE MOVES THE BAG OVER TO THE CONVEYOR BELT OR

23 SOMETHING AND SEALS IT UP.

24 A ONTO A CONVEYOR BELT AND NORMALLY INTO A DEVICE THAT

25 PUTS A PLASTIC FILM AROUND THE BAGS.

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1 Q OKAY. THE BAG WE'VE GOT HERE TODAY --
2 A YES.
3 Q CAN I SEE THAT FOR JUST A MOMENT?
4 A YES.
5 Q IS THE TYPE OF BAG THAT'S USED?
6 A THAT'S ONE OF THE TYPES OF BAGS.
7 Q OKAY. WHAT IS THIS BAG USED FOR?
8 A IT'S USED FOR SEVERAL DIFFERENT PRODUCTS. THAT'S THE
9 REASON IT DOESN'T HAVE A GRADE DESIGNATION ON IT.
10 Q THE GRADE DESIGNATION WOULD BE BENEATH THE CALIDRIA
11 ASBESTOS SIGN?
12 A HOPEFULLY.
13 Q OKAY. AND WHAT GRADES WOULD THIS BAG BE USED FOR?
14 A IT COULD BE USED FOR ANY OF OUR, WHAT WE CALL OPEN-
15 FIBER PRODUCTS.
16 Q THAT IS THE NON-PELLET STUFF?
17 A YES, NON-PELLET.
18 Q OKAY. AND WHAT ARE THE GRADES OF THOSE NON-PELLETS?
19 A STANDARD GRADE 130.
20 Q OKAY. WHAT DOES THE 130 MEAN?
21 A NOTHING REALLY. AGAIN, IT'S THE OPEN FIBER VARIETY
22 OF OUR STANDARD GRADE PELLETS. IT'S THE LOWEST PURITY
23 GRADE, IF YOU WILL.
24 Q OKAY. THE 130 JUST MEANS IT'S AN OPEN FIBER?
25 A UH-HUH.

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1 Q OKAY. WHAT WOULD BE THE GRADE FOR THE CLOSED PELLET
2 GRADE?
3 A THAT'S G200.
4 Q OKAY. AND THEN IS THAT SAME 130 DESIGNATION USED IN
5 THE SSG130 OR IS IT SOMETHING ELSE?
6 A NO, THE STANDARD GRADE 200 IS THE PELLET FORM OF THE
7 SUPER STANDARD GRADE. THE TWO MORE OR LESS SIGNIFIES
8 THAT IT'S THE SUPER STANDARD GRADE.
9 Q THAT'S THE SG200?
10 A THAT'S THE PELLET FORM OF THE INTERMEDIATE GRADE OR
11 INTERMEDIATE PURITY.
12 Q OKAY. AND THE 200 EQUALS S.S.G. PELLETS?
13 A RIGHT. DOING PRETTY GOOD.
14 THE SG210 IS OPEN FIBER VARIETY OF SG200.
15 Q OKAY.
16 A THEN WE HAVE RG100, WHICH IS THE PELLETIZED VERSION
17 OF THE HIGHER QUALITY, AND RG144 IS THE OPEN-FIBER
18 VARIETY OF THE RG100.
19 Q OKAY.
20 A ANY OF THOSE OPEN PRODUCTS WOULD GO IN HERE. AND
21 BECAUSE THERE IS PURITY DIFFERENCE, THE BAG WILL HOLD
22 DIFFERENT WEIGHTS DEPENDING ON WHICH PRODUCTS ARE USED.
23 Q GIVE ME THE RANGE OF WEIGHTS.
24 A I THINK THE SG130 IS 40 POUNDS.
25 Q RG140.

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1 A RG144 IS 35 POUNDS.
2 Q AND IS SG210 SOMEWHERE IN BETWEEN?
3 A I THINK -- NO, IT'S ALSO 35 POUNDS, EITHER 30 OR 35.
4 Q NOW, HAVE YOU USED ANY OTHER CONTAINERS FOR YOUR FIBROUS
5 ASBESTOS SINCE 1963?
6 A NO, IT'S ALWAYS BEEN PAPER BAGS.
7 Q HAS IT ALWAYS BEEN SIMILAR TO THIS PAPER BAG.
8 A UH-HUH.
9 Q I REALIZE THE WORDING ON IT MAY HAVE BEEN DIFFERENT
10 OR THE NAMES MIGHT HAVE BEEN DIFFERENT BUT HAS IT BEEN
11 SUBSTANTIALLY SIMILAR TO THE BAG WE HAVE BEFORE US?
12 A YES.
13 Q NOW, YOU STATE THAT A SEAL IS PUT AROUND THE BAG ITSELF
14 BEFORE IT IS SHIPPED?
15 A YES.
16 Q NOW, THIS BAG WE HAVE HERE HAS INNUMERABLE PUNCTURE
17 HOLES IN IT. IS THAT HOW YOU RECEIVE THE BAGS TOO?
18 A YES, THAT'S TO LET THE AIR OUT IN THE PNEUMATIC FILLING
19 OPERATION.
20 Q OKAY. AS IT IS FILLED UP?
21 A UH-HUH.
22 Q OKAY. AND DOES DUST ALSO COME OUT OF THOSE HOLES WHEN
23 IT IS BEING FILLED UP?
24 A NOT NORMALLY, NO. THOSE HOLES ARE STAGNANT. THAT'S
25 EITHER A TWO OR THREE PLY BAG AND THE HOLES ARE PUNCHED

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1 AT DIFFERENT LOCATIONS IN THE DIFFERENT LAYERS.

2 Q IN EACH PLY.

3 A SO THAT YOU HAVE A ZIGZAG PATTERN AND THE FIBERS ALSO,
4 AGAIN BEING FIBROUS, CAN GET OUT THE SAME HOLE THAT
5 THE AIR CAN.

6 Q OKAY. NOW, THE ASBESTOS IS BACK IN A CAKE FORM CAUSED
7 NOT BY ANY WATER OR ANYTHING LIKE THAT BUT BECAUSE OF
8 PRESSURE?

9 A IT'S JUST PRESSURE, YES.

10 Q AND IT WILL BREAK APART EASILY, WON'T IT?

11 A IF YOU SLIT THE BAG IN HALF, IT WOULD FALL OUT. IT
12 IS NOT GOING TO STAY IN THERE LIKE CONCRETE.

13 Q IT'S STILL IN THE CONSISTENCY LIKE A LADY'S POWDER OR
14 SOMETHING LIKE THAT? YOU COULD PUT YOUR HAND DOWN IN
15 IT IN THE BAG, IF YOU WANTED TO, AND WOULD IT BE
16 SOMETHING LIKE -- ANOTHER EXAMPLE, IT WOULD BE SOMETHING
17 LIKE BABY POWDER? IS IT THAT FINE?

18 A NO, I WOULDN'T THINK IT WOULD BE THAT FINE.

19 Q OKAY. BUT IF YOU PICKED IT UP, YOU COULD JUST BLOW
20 IT AND IT WOULD GO AROUND IN THE AIR, WOULD IT NOT?

21 A PROBABLY WOULD, YES. DEPENDS ON HOW HARD YOU BLEW
22 ON IT.

23 Q IF YOU JUST DROPPED SOME FROM EIGHT OR TEN FEET AND
24 IT WOULD JUST FLOAT DOWN, IT WOULD TAKE QUITE AWHILE
25 FOR IT TO REACH THE GROUND, WOULD IT NOT?

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1 A IT'S PRETTY DENSE.

2 Q UH-HUH.

3 A AGAIN, ASBESTOS IS 2.45 SPECIFIC GRAVITY AND IT FALLS

4 PRETTY RAPIDLY. YOU COULD KEEP IT SUSPENDED IF YOU

5 HAD AN AIR DEVICE UNDERNEATH IT, OR A FAN, YOU COULD

6 BLOW IT AROUND.

7 Q OKAY. NOW, I'VE SHOWN YOU A COUPLE OF PATENTS THERE,

8 CAN YOU DESCRIBE FOR ME JUST GENERALLY WHAT THOSE TWO

9 PATENTS ARE FOR?

10 A WELL, THE ONE, NO. 3471438, THE TITLE OF IT IS

11 ASBESTOS COMPOSITION. THIS IS THE PATENT THAT WE HAVE

12 ON OUR RG244 PRODUCT, WHICH WE HAVE NOT MENTIONED YET.

13 Q OKAY. TELL ME WHAT THAT IS. HOW IS THAT DIFFERENT

14 FROM THESE OTHERS?

15 A WELL, WE ACTUALLY HAVE A SEPARATE PRODUCTION SYSTEM

16 FOR RG244. WE TAKE THE SLURRY FROM THE MAIN CIRCUIT,

17 WHICH WOULD BE, IF YOU TOOK IT TO ITS FINAL STAGE, WOULD

18 BE RG144, BUT YOU'RE GOING TO TAKE A CERTAIN PORTION

19 OF IT AND FEED IT INTO THIS OTHER SYSTEM WHERE THERE

20 IS MORE GRINDING AND MORE HYDROCLONING, MORE SEPARATION,

21 TRYING TO GET SMALLER AND SMALLER FIBERS AND HIGHER

22 PURITY FIBERS. AND THEN THAT SLURRY IS CHEMICALLY

23 MODIFIED TO PRODUCE A -- THE PRODUCT CALLED RG244, WHICH

24 IS ACTUALLY ASBESTOS FIBERS WITH A SILICA COATING

25 ON THEM.

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