

1 some of the numbers that you found yourself?

2 A Seems to be kind of cyclic reasoning there.

3 Q Okay. Is this the first page of Roberts'
4 report dated May 12, 1980 which is the industrial
5 hygiene survey report of the New York City sanitation
6 which equals number 1 there?

7 A It appears to be, yes.

8 Q The time-weighted average was .21 and that
9 is what Roberts reported?

10 A I believe that is true based on 5.4 hours.

11 Q Isn't it true that Mr. Roberts in his
12 discussion section indicates that significant
13 concentrations may be generated during brake cleaning
14 of the brake shoes and brake housing backing plate.

15 Recommendations include the use of
16 respirators and implementation of a vacuum or wet
17 cleaning system to remove dust from the brake housing.

18 Isn't that what Roberts wrote?

19 A Let's understand that that is not his
20 recommendation. That is what somebody has written
21 about this paper.