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1 shears off the lining.
 2 Q. Those brake shoes that go to the chopper do
 3 not go to the burner?
 4 A. Do not go to the burner.
 5 Q. So the chopper, again, is after the brake shoe
 6 has been used and is coming back to the plant for
 7 remanufacturing?
 8 A. Yes.
 9 Q. Why would the asbestos levels be in excess of
 10 recommended amounts in the chopper area?
 11 A. Because the way in which the lining is
 12 removed, it breaks it up, chops it up. Again, we made
 13 improvements in that area. We had vacuuming units there
 14 to begin with.
 15 To correct both areas, we started wetting them
 16 down, and that solved the problem, because the way in
 17 which the lining was coming off of the shoe, removing
 18 it, you were actually fracturing it.
 19 Q. So this is a process. When you say you made
 20 improvements, this is a process that started with
 21 feedback from your insurance company as early as 1971
 22 and was continuing on through 1991?
 23 A. Yes.
 24 Q. And each year or each report, there would be
 25 some changes or efforts made to address problems that

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1 the levels changed dramatically over the
 2 20 years.
 3 Q. (By Mr. Dumler) You can answer.
 4 MR. RILEY: I object to the form of the
 5 question. You can rephrase the question.
 6 Q. (By Mr. Dumler) Well, I'm going to let my
 7 question stand. If you can answer it, you can answer
 8 it.
 9 A. We made changes. But where we made the
 10 changes was not on the output, it was on the input. So
 11 it was basically the beginning of the process. It had
 12 nothing to do -- where we made changes had nothing to do
 13 with the end product being boxed going back out to the
 14 customer. Where we made the changes was at the
 15 beginning of removing of the product or removing of
 16 the friction material.
 17 (Plaintiffs' Exhibit LeCour 34 was marked.)
 18 Q. (By Mr. Dumler) I'll give you what's been
 19 marked as Exhibit 34 and ask you if you can identify
 20 that for me?
 21 A. It's an Engineering Report --
 22 MR. RILEY: Wait a minute.
 23 A. (Continued) -- Genuine Parts Company, Rayloc
 24 Division, Hancock, Maryland, January 21st, 1992,
 25 prepared by Travelers and David W. Glassman, who was

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1 came up --
 2 MR. RILEY: Maybe.
 3 Q. (By Mr. Dumler) -- if there was a problem
 4 that came up.
 5 To the extent that there was a problem in
 6 these documents, we -- at Rayloc, you at Rayloc, made
 7 some efforts to change the procedures that you were
 8 using?
 9 A. Absolutely, yes.
 10 Q. Okay. So by 1991, you had 20 years of having
 11 your insurance company provide you feedback and make
 12 changes to various products, but still there were levels
 13 in excess of recommended amounts; is that correct?
 14 MR. RILEY: Objection to the form of the
 15 question. You said "products" instead of
 16 "processes."
 17 Can you read it back for him so he could
 18 hear it?
 19 MR. DUMLER: I'll rephrase it.
 20 Q. (By Mr. Dumler) Are you saying that 20 years
 21 after your first insurance company sent air sampling,
 22 it was still necessary for you to make changes in your
 23 processes to ensure that there were not exposures to
 24 asbestos in excess of recommended levels?
 25 MR. RILEY: I'll object to that, because

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1 with the Environmental Service Unit.
 2 Q. Are you familiar with that document?
 3 A. No, I'm not.
 4 Q. You did not receive a copy of that document
 5 when it came?
 6 A. No, I did not.
 7 Q. Did anyone advise you of the results of that
 8 study?
 9 A. No, they did not.
 10 Q. Do you have an understanding of why a variety
 11 of studies done by Travelers at your manufacturing
 12 operation showed impermissible levels of exposure to
 13 asbestos?
 14 A. No, I do not.
 15 Q. Do you have any idea as to whether or not it
 16 was the particular equipment that was being used, as
 17 opposed to other problems? Do you have any reason or
 18 understanding of why, over time, various air sampling
 19 came back showing that there was an impermissible
 20 exposure level?
 21 A. If the laws changed, that could be one
 22 incident, where prior to the change in law, what we had
 23 in place was sufficient. In other cases, it was the
 24 equipment itself.
 25 Q. At any time during your employment at Genuine