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2 4.07 Did defendant ever institute a safety program other
3 than pulmonary function tests and x-ray exams for its
4 asbestos-exposed workers?

5 ANSWER: S. K. Wellman has taken air samples in its facilities since the mid-1970s.
6 For a time in the 1970s and possibly early 1980s when materials of unknown identity
7 were being subject to certain processes in its laboratory, S. K. Wellman made
8 respirators available to laboratory employees.
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12 4.08 If the answer to the foregoing interrogatories is in
13 the affirmative, state:

- 14 (a) The nature of such program(s);
15 (b) Whether such program was optional or mandatory;
16 if mandatory, when it became so;
17 (c) The location(s) of such program(s);
18 (d) The date of service of such program(s);
19 (e) If any of the program(s) have undergone
20 modification, the nature and dates of such
21 modification;
22 (f) The custodian (by name, address and position) of
23 records of such x-ray test program(s);
24 (g) The highest level of management (by name,
25 address and position) who participated in the
26 decision to institute such program(s).