

Dupont

Transcripts

Jan 10, 2017 Zampa, Richard 01-09-16

Range: 133:4-134:8

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4 Q. And then the next job is a big one,
5 E.I. DuPont.
6 Do you know who E.I. DuPont is?
7 A. Yes.
8 Q. What'd you do for E.I. DuPont?
9 A. We built a complete brand-new pigment plant out
10 there in Antioch. They're a paint contractor, so paint
11 pigment.
12 Q. So you were working directly for E.I. DuPont;
13 correct?
14 A. Yes. E.I. DuPont was their own construction
15 company, and they direct hired all crafts.
16 Q. And so as an ironworker, you were directly
17 working for the E.I. DuPont Construction Company?
18 A. Yes.
19 Q. And it says here that you made, in '62,
20 \$1,693.14; right?
21 A. Yes.
22 Q. And then in '63/'64, you made \$4,800 each, in
23 each of those years; right?
24 A. Yes.
25 Q. And tell us about DuPont. What type of work

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1 did you do at DuPont specifically?
2 A. Well, we built a whole complete new pigment
3 plant, six or eight stories, maybe even ten. Structural
4 steel platforms, ladders, walkways, pipe racks. Very
5 similar to the refinery work.
6 Q. And when you worked at DuPont, did you work
7 around other crafts?
8 A. Yes.

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Range: 134:20-136:16

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20 Q. So DuPont, did they ever warn you about the
21 dangers of asbestos?
22 A. No, they did not.
23 Q. Did they have safety meetings?
24 A. DuPont was one of the few companies that I ever
25 worked for that all they did was talk about safety. It

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1 was very -- almost with -- people would say in the
2 construction industry, like, an overkill type of thing,
3 as far as you had to have -- ironworkers never wore
4 hard-toed boots. But there, you had to wear hard-toed
5 boots. If you stood on the table to weld something,
6 they wanted you tied off. Very, very serious on the
7 safety.
8 Q. And did --
9 A. Did not ever talk about asbestos.
10 Q. Did they ever talk about the dangers of dust or
11 anything?
12 A. No.
13 Q. Did they ever talk about taking showers or
14 changing out your clothes at work?
15 A. No.
16 Q. Did anybody at DuPont ever give you any
17 respirators to wear?
18 A. No.
19 Q. Did anybody at DuPont ever give you any masks?
20 A. No.
21 Q. Did anybody at DuPont -- you were working --
22 you're a direct employee for DuPont; right?
23 A. Yes.
24 Q. Did they ever have any facilities for you to
25 take showers before you went home?

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1 A. No.
2 Q. Did you ever get any instruction about ways to
3 eliminate whatever's on your clothes before you left the
4 job site?
5 A. No.
6 Q. Was your supervisor a DuPont employee at
7 DuPont?
8 A. My direct supervisor was not. He was a DuPont
9 employee like I was.
10 Q. Yeah.
11 A. Yes.
12 Q. Okay.
13 A. Yeah.
14 Q. And did any of your direct supervisor at DuPont
15 ever talk to you anything about asbestos issues?
16 A. No.

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Range: 136:17-137:18
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17 Q. So what other crafts worked alongside you when
18 you were building this new -- doing this new
19 construction at DuPont?
20 MR. MORTL: Overbroad.
21 THE WITNESS: All crafts. Carpenters,
22 laborers, asbestos workers, pipefitters, boilermakers.
23 BY MR. SATTERLEY:

24 Q. Did -- was there insulation? Did you observe
25 any insulation --

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1 A. Yes.
2 Q. -- at the DuPont job?
3 MR. MORTL: Overbroad.
4 BY MR. SATTERLEY:
5 Q. And what type of insulation do you recall?
6 MR. MORTL: Calls for speculation. Lacks
7 foundation.
8 THE WITNESS: Same types. The wrap, as we seen
9 on Exhibit 26, and the box type.
10 BY MR. SATTERLEY:
11 Q. The block insulation?
12 A. Yes.
13 Q. And the pipe covering, the half-rounds?
14 A. Pipe covering, yes.
15 Q. And did you see the insulators? Did they
16 manipulate the insulation?
17 MR. MORTL: Overbroad.
18 THE WITNESS: Yes.

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Range: 137:20-138:9
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20 Q. Now, do you know what fireproofing is?
21 A. Yes.
22 Q. What is fireproofing?
23 A. Fireproofing is when they would spray this
24 fireproofing on the columns and beams of, like, a
25 high-rise unit, like a hotel mainly, that type of thing.

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1 They would spray that on all the columns, all the beams
2 that we erected after, and under the flooring and
3 decking.
4 Q. Did you -- at DuPont, did you ever see any
5 fireproofing work being done?
6 A. I believe so.
7 Q. Do you know the names of any of the products
8 that the fireproofing was at DuPont?
9 A. Offhand, no.

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Range: 138:10-139:8
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10 Q. Okay. Did the insulation work at DuPont create
11 dust in your vicinity?
12 A. Yes.

13 MR. MORTL: Overbroad. Vague.
14 BY MR. SATTERLEY:
15 Q. Did you get dust on your clothes at DuPont?
16 A. Yes.
17 Q. Did you -- at all times when you worked at
18 DuPont, '62 to '64, you were still living at Alhambra;
19 correct?
20 A. Yes.
21 Q. And did you go home from Antioch back to
22 Crockett?
23 MR. MORTL: Overbroad.
24 THE WITNESS: Yes.
25 ---o0o---

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1 BY MR. SATTERLEY:
2 Q. How far is Antioch from Crockett,
3 distance-wise?
4 A. Probably like 30 -- 35, 33-mile range.
5 Something like that.
6 Q. Was it a situation where you would have to
7 spend the night up there at DuPont?
8 A. No. No. We drove back and forth daily.

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Range: 139:21-140:21

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21 Q. And the work clothes that you're wearing in
22 DuPont in '62, '63, '64, were they dusty when you went
23 home?
24 A. Yes.
25 Q. And did you hug your sons and your daughters

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1 and kids when you went home from work at DuPont?
2 MR. MORTL: Overbroad.
3 THE WITNESS: That was a daily thing. Always
4 wrestled around and kidded. The highlight of my life
5 was getting home and see the kids waiting for me.
6 BY MR. SATTERLEY:
7 Q. Did the kids -- when you walk -- when you come
8 through the door or come up to the house, did they run
9 up to you and hug you?
10 A. Oh, yeah. I'd have one on every leg and then
11 some. In fact, I can remember them, as things come
12 back, them getting in my boots saying, "Look, Dad."
13 Q. Playing in your work boots?
14 A. Exactly. Taking them off.
15 Q. Were your boots dirty and dusty from work?
16 A. Oh, yeah.
17 MS. MCMEEL: Overbroad.
18 BY MR. SATTERLEY:
19 Q. Did you ever have any clue whatsoever that your
20 boots or work clothes could hurt your kids in any way?

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Range: 144:1-5

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Swinerton

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1 Q. Now, on the timeline of different jobs it looks
2 like you went back -- in '64, it looks like you worked
3 both at DuPont for part of the year and at Swinerton for
4 part of the year; is that accurate?
5 A. Yes, yes.

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Range: 290:22-291:8

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22 Q. Do you recall one of DuPont's safety
23 initiatives was to minimize dust whenever possible?
24 MR. SATTERLEY: Objection. Assumes facts not
25 in evidence.

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1 THE WITNESS: Minimize dust. So we're getting
2 dust -- we're talking about dust? We're talking about
3 insulation now?
4 BY MR. MORTL:
5 Q. Any kind of dust, actually. I don't mean to
6 just limit it to --
7 A. Yeah, there was insulation on the site. And it
8 was dusty from insulation in the piping.

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Range: 294:1-17

Issues: Dupont

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1 Q. Okay. And just walk us through quickly, how
2 would you unload the structural steel? Is it just a
3 couple of guys lifting this? Is it equipment lifting
4 it?
5 A. Equipment. Crane and slings.
6 Q. So you help -- what was your role in the
7 unloading of the structural steel at DuPont?
8 A. Sling the -- whatever it was. Sling the
9 structural steel, if it was structural steel. If it was
10 a piece of equipment, we would rig it with a sling with
11 a crane, off-load it.
12 Q. And was that a regular daily activity?
13 A. Yes.
14 Q. Okay. And --

15 A. Both myself and Michael Leary. If any work had
16 to be done there, it was us. We were the work crew of
17 the job.

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18 Q. And on an average, how long would it take to
19 unload?

20 A. Depending on what it was.

21 Q. What could it range -- a reasonable range be?

22 A. Well, a piece of machinery. And you'd check
23 out the tonnage. You maybe go get some slings, maybe
24 the right-sized slings or the length slings or side out.
25 In most of those units, it's not a thing with a picking

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1 point where you just hook on and pick it. You have to
2 figure out a safe way to do it and how to do it -- the
3 proper equipment, the proper crane, and also where
4 you're going to land it.

5 Q. Okay. So it could take quite a bit of time to
6 do it correctly?

7 A. Depending on what it was.

8 Q. Okay. Same with the structural steel?

9 A. Yes.

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Range: 297:2-299:8
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2 Q. And when you're -- so you're building this
3 pigment manufacturing tower from the ground up.

4 As you're erecting the structural steel, no
5 other trades are working in the immediate area; correct?

6 MR. SATTERLEY: Objection. Mischaracterization.

7 THE WITNESS: No, it's not correct. There are
8 trades working there. As your floors go up, you'll have
9 a pipefitter there or a boilermaker there working on
10 their portion of it.

11 BY MR. MORTL:

12 Q. And they would come in after you had erected
13 the frame of the tower?

14 MR. SATTERLEY: Objection. Mischaracterization
15 of prior testimony.

16 THE WITNESS: They would come in sometimes
17 later, and sometimes it'd be right there, to start
18 working on something. Or maybe the pipefitter or the
19 boilermaker, foreman, or boss would be there in
20 direction of how they wanted that set.

21 BY MR. MORTL:

22 Q. And how do you recall the actual DuPont pigment
23 plant, the staging of construction and the various
24 contractors taking place for that specific job?
25 A. What do you mean by various contractors? We

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1 were working for DuPont. We were the contractor.

2 Q. Various tradesmen.

3 A. Every trade was there. They direct-hired the
4 trades.

5 Q. And is it your recollection that every trade
6 was there working on the construction from day one till
7 the end?

8 A. Well, naturally, there wouldn't be any piping
9 there until they got ready for it. But the ironworkers
10 were there prior to some of the crafts, probably some of
11 the piping, and the boilermaker. Because we also did
12 the reinforcing work on the job.

13 Q. And that's what I'm trying to get at.

14 So were the steelworkers the first craft on the
15 job?

16 A. We're ironworkers, not steelworkers. First
17 thing. Big difference.

18 Q. I'm sorry.

19 A. Laborers, probably last were out there. The
20 ironworker and some carpenters, probably fairly close
21 together.

22 Q. And about how long were you out working on that
23 job site, if you remember, before pipe workers might
24 have come on for their stage of the work?

25 A. Depending on how the equipment came in. So the

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1 piping of the -- if there's piping there that they could
2 be working on; they'd bring them in shortly after.

3 Q. And how about insulators?

4 A. Insulators were there as soon as the piping
5 came. Fairly close to that.

6 Q. And you recall that there were construction
7 fabrication shops that various trades would work in?

8 A. I recall that we had one.

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Range: 300:11-303:23

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11 Q. And do you recall that the insulation workers
12 would insulate pipe or whatever they were insulating in
13 their own area and then bring it out for installation in
14 place?

15 A. Well, it might not have been in an area. It
16 might just be where it was laid down after it was
17 off-loaded. And then they did preinsulate some pipe to
18 set.

19 Q. And do you recall at the DuPont site

20 specifically witnessing any insulation work?
21 A. Yes.
22 Q. And tell me about that. Where would that have
23 been?
24 A. Wherever they chose to do it, as far as it
25 could be in a lay-down area or maybe for productivity.

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1 They would shake it out and do the best they could. It
2 was all outside.
3 Q. And do you have a specific recollection of
4 any --
5 A. Off-site.
6 Q. -- particular area?
7 A. No. It could be anywhere.
8 Q. Do you have any recollection how far you were
9 away from the insulators when you saw them doing
10 insulation work?
11 A. I seen them doing the insulation there on the
12 ground or whenever they were. Just I have a
13 recollection of seeing it.
14 Q. Okay. But you don't have a recollection of how
15 far away they were from you?
16 A. From me? Not necessarily. But we did erect
17 the pipe later after it was insulated.
18 Q. A pipe that would be preinsulated?
19 A. Yes.
20 Q. When you say "we would erect that pipe,"
21 describe to me what you mean.
22 A. Okay. It was rigging a piece of pipe in an
23 area to tie into another piece of equipment. So we'd
24 have to look and see where it's going to go, how we were
25 going to duck it in into the structure. And as I said

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1 in prior testimony with other companies, we'd take a
2 Crescent wrench and knock off that insulation to get to
3 the bare pipe, put a sling and a wrap on it in the
4 center, so you could tip it and roll it and move it and
5 erect it.
6 Q. And how often would you do that work?
7 A. Whatever pipe was set on the whole job, we did
8 whatever it took on any elevation. Myself and
9 Michael Leary did that.
10 Q. And do you have a recollection of how
11 intermittent that work was?
12 MR. SATTERLEY: Objection.
13 THE WITNESS: It was generally -- in most
14 cases, it was generally after the structure was up.
15 BY MR. MORTL:
16 Q. So this would have been after being on the job
17 for several months?
18 A. Could be, yeah.
19 Q. And after the structure was up and you would
20 start erecting this pipe, how often would that take
21 place, if you remember?
22 A. Sometimes all day, we'd do that.

23 Q. And were there some days where you wouldn't do
24 it at all?
25 A. We'd go back and do some unloading or some

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1 rigging on something else, another piece of equipment,
2 some exchangers or whatever mechanical stuff had to go
3 out there.
4 Q. Okay. Can you give me any estimate, either in
5 days or weeks, of how much time at the DuPont facility
6 you think you might have erected pipe?
7 A. No. We were there till the end, till the end
8 of the job. So. . .
9 Q. And --
10 A. As the job tapered off and they started laying
11 off crafts, we were some of the last people there doing
12 that.
13 Q. And not all the -- not all the pipe that you
14 erected at that site was insulated; correct?
15 A. Not every piece, but a major majority.
16 Q. And do you recall the types of insulation that
17 were used?
18 A. Both Thermobestos and Kaylo.
19 Q. And do you recall there being non-asbestos
20 insulation used at that?
21 A. Non-asbestos insulation?
22 Q. Yes.
23 A. I don't recall any of that.

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Range: 303:24-304:9
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24 Q. Okay. And you say Kaylo. Let me ask you about
25 that.

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1 How did you know Kaylo insulation was being
2 used at the pigments plant at DuPont?
3 A. Well, that comes in sections, and generally,
4 like, it comes in a box, a cardboard box.
5 Q. Did you ever see the boxes at a DuPont site?
6 A. Yeah. Yes.
7 Q. And where would you see the boxes of Kaylo
8 insulation at the DuPont site?
9 A. As they were unloaded or discarded.

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Range: 304:17-305:8
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17 Q. The Thermobestos, how do you know Thermobestos

18 insulation was used there?

19 A. It's generally in shapes of a pipe,
20 half-rounds, different diameters for different-sized
21 pipes in certain lengths; where the other is a flat,
22 brick-type flat.

23 Q. "The other," being Kaylo?

24 A. Kaylo, yeah.

25 Q. And --

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1 A. Sometimes they'd put it on a couple of layers
2 on the flat, generally about three-foot-long pieces.
3 Different thicknesses and heights.

4 Q. And the Thermobestos insulation, did you ever
5 see any packaging or markings to identify it as
6 Thermobestos at the DuPont site?

7 A. They were crate boxes. I call them crates.

8 But cardboard boxes around. Come in truckloads of them.

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Range: 307:13-21

Issues: Dupont

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13 Q. And if you were erecting preinsulated pipe,
14 would your -- in those instances, would your work always
15 require you to remove some of the insulation?

16 A. Preinsulated?

17 Q. Yeah.

18 A. Meaning, prior to insulation?

19 Q. Meaning, it's been insulated before you got
20 ahold of it.

21 A. Yes.

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Range: 309:10-23

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10 Q. Okay. Thank you.

11 Before we broke for lunch, we were talking
12 about your work at the DuPont facility in Antioch, and
13 you described how from time to time you would beat the
14 insulation off a pipe as part of your job?

15 A. Yes.

16 Q. Okay. I'd like to explore that a little bit.

17 Would you beat it off with, like, a Crescent
18 wrench?

19 A. Yeah. We always had a Crescent wrench. With
20 the head of the wrench, knock that insulation off.

21 Q. And how much insulation are you talking about?
22 Like, a foot or two feet?

23 A. Yeah. Not more than a foot.

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Range: 310:18-312:23

Issues: Dupont

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18 Q. And do you recall, were the insulators that you
19 worked with at the DuPont site, were they there through
20 a contractor? Or were they also DuPont employees?

21 A. I believe they were DuPont employees. They
22 were Plant Insulation. That's what they used there,
23 Plant.

24 Q. And what is your understanding? What's --

25 A. That's the name of the type of insulation.

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1 Different groups worked with different people, and the
2 people out there, I believe, worked for Plant.

3 Q. And is it Plant Insulation? As you understand,
4 is that a company?

5 A. Yes. A type of an insulation.

6 Q. Meaning . . .

7 A. They do that insulation work.

8 Q. Okay. Is Plant Insulation an actual type of
9 physical insulation as well?

10 A. Yes.

11 Q. So the insulation itself is called Plant
12 insulation?

13 A. Yes.

14 Q. And was that the insulation used at the DuPont
15 site?

16 A. I think they had both types, yeah.

17 Q. And when you say "both types," what do you
18 mean?

19 A. I think they had some Kaylo out there and some
20 Thermobestos, I think.

21 Q. And what about Plant insulation? Is that a
22 type as well?

23 A. Yes. It's a little different -- I don't know
24 if you want to say texture or color or something, but
25 yeah.

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1 Q. Okay.

2 A. They were out on the job sometimes. That's why
3 I recall the name.

4 Q. And do you know, was the Plant insulation that
5 you're referring to, do you know if that contained
6 asbestos or not?

7 A. Yes.

8 Q. You believe it did?

9 A. Yes.

10 Q. And what color was that?

11 A. It was a little -- it was, like, an off-white.
12 Like, a little maybe a tan, tannish.

13 Q. And in what forms did it come?

14 A. Same as the other.

15 Q. Meaning. . .
16 A. Meaning round surfaces, round sections. They
17 come out preformed.
18 Q. Preformed rounds?
19 A. Yeah. Different sizes for different-sized
20 pipes.
21 Q. Any other types of insulation you recall at the
22 DuPont site?
23 A. Not at this time.

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Range: 313:7-12
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7 Q. Okay. We were talking about when you would use
8 your Crescent wrench and beat off insulation.
9 Is this something that your other ironworkers
10 would do as well?
11 A. It was common -- common practice. If that's
12 what we had to do, yeah.

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13 Q. And the purpose of knocking off the insulation
14 was to what?
15 A. To get to the bare pipe. Put your sling on it
16 so it wouldn't slip when you lift it.
17 Q. And the sling was so that it could be lifted
18 with a crane?
19 A. Yes.
20 Q. And once it would be lifted up to the place
21 where you wanted to rig it, what would you do?
22 A. Set it in place where it had to go. May have
23 to duck through a beam, may have to set it down and
24 unhook and get the ball over on the other side of the
25 pipe, pick it up again, and maneuver it in.

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1 Q. How would you set pipe in place? Would you be
2 bolting it to --
3 A. It could be either. Could be setting it on a
4 couple of beams, or it could be flanged together.
5 Q. Okay. And once it was set in place, would
6 insulators come in and repair the insulation?
7 A. Yes.
8 Q. Okay. And that would be after you guys had set
9 it in place?
10 A. Yes.
11 Q. And left that area?
12 A. Yes.

13 Q. Okay. Is the -- approximately how long would
14 it take you on average to knock the insulation off a
15 pipe at DuPont?
16 A. A minute or -- depending on the size of the
17 pipe. But, you know, a minute or two. It wouldn't take
18 much.
19 Q. And about how many times do you think you
20 personally did that -- either a day or a week or
21 whatever kind of estimate you can give me -- at the
22 DuPont site?
23 A. That's -- I can't come up with anything on
24 that. It was an everyday procedure.
25 Q. So a couple times a day? A few times a day?

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1 A. Yeah. Or more.
2 Q. And --
3 A. And you were asking about when they'd come and
4 repair that portion. They wouldn't do it right then.
5 There'd be a crew that come later. We might be setting
6 a piece of pipe right here. They'd be repairing right
7 here above us.
8 Q. Okay. So when you say "they would come do the
9 repairs," you're talking about the insulators that come
10 in?
11 A. Insulators.
12 Q. That's part of the pipe that you knocked off?
13 A. Yeah, that we knock off. They true it up, cut
14 it up, make a nice square edge, and then put a piece in
15 there. Cut it, put a piece in there.

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Range: 319:2-25
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2 Q. And I think you testified that sometimes you
3 might see insulators insulating pipe before it went up
4 into the structure; is that correct?
5 A. Yes.
6 Q. All right. Do you ever see them -- what
7 kind -- was that the half-rounds that they were
8 installing?
9 A. They would do it for productivity on the
10 ground, yes.
11 Q. So the preformed half-rounds they were putting
12 on there?
13 A. Yes.
14 Q. And how about once up on the structure? Do you
15 ever see insulators working on the structure?
16 A. Yes. They would be -- not on the structure per
17 se, but maybe on some equipment there that they had.
18 You know, if it'd be a turbine, which I can't recall if
19 there was a turbine or a boiler there, they have to wrap
20 those. Or exchangers. Sometimes they'd rig 'em. A
21 piece would come in and be ready for it. They'd rig it

22 in place and have to go up there and do it. Sometimes
23 if they could, they'd do it on the ground.
24 Q. Okay. So, again, no estimate of how often --
25 A. No.

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Range: 320:20-22
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20 Q. Did the insulators that you observed at any
21 time, did they wear any kind of dust mask?
22 A. Not that I ever seen.

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Range: 323:18-325:13
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18 Q. And did you work side by side with painters at
19 DuPont?
20 A. I did not.
21 Q. How about fireproofers?
22 A. Not side by side, but they were there.
23 Q. Okay. And how far away do you think you worked
24 from what you thought was fireproofers?
25 A. Well, it depends what your job was for the day.

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1 If you were setting structural steel, you might be above
2 'em. If you were coming in changing a platform, it
3 might have been already blowing on there or they were
4 blowing on the same floor. Things change daily.
5 Q. And do you specifically recall there being
6 fireproofing at DuPont?
7 A. I believe so.
8 Q. And when you say "believe so," does that mean
9 you have --
10 A. That's why I said I believe so.
11 Q. Do you have a specific recollection of any
12 particular part of the plant that you were erecting that
13 had fireproofing installed to it?
14 A. Structural steel portions, the columns.
15 Q. And how long would that work -- would the
16 fireproofing work take?
17 A. How long would the fireproofing work? I don't
18 get your question. Until they got it done. That was
19 their job to do.
20 Q. And so was this intermittent work when the
21 fireproofers come and go or all in one shot?
22 A. In most cases, I was above it. So. . .
23 Q. And when you say you were above it, I'm trying
24 to think, was the plant facility you were erecting kind
25 of broken down into floors?

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1 A. No. As I explained, like the towers, you build
2 a floor and then you do the next floor and the next one.
3 And people come behind you and putting their floors up.
4 So I was a connector, myself and Michael Leary, on
5 the -- leading erecting the structural steel.

6 Q. Okay. So you guys were connecting as the
7 structure got taller and taller and taller?

8 A. As it grew, yes.

9 Q. And that was your primary job?

10 A. Yeah, in addition to other things. But that's
11 what -- that was what the primary job was. That was our
12 primary job, our crew. The other crews were doing
13 different stuff.

 Jan 20, 2017 Zampa, Richard 01-10-17

Range: 325:14-326:2

Issues: Dupont

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14 Q. Thank you. What shift did you work at DuPont?

15 A. Day shift. Days.

16 Q. And do you recall roughly what the hours were?

17 A. 7:00 to 3:30 or 8:00 to 4:00 or something like
18 that. 8-hour day.

19 Q. And did they have a lunchroom for you? Where
20 would you eat?

21 A. You'd sit down and have lunch wherever.

22 Q. So you'd have it right there in the field?

23 A. Yes.


24 Q. Same with breaks? Was there a break room or
25 you'd just take it right there on the site?

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1 A. Construction don't have break rooms. There's
2 two can'ts. You can't do it; you can't stay.

Firebrick / Mixing

Transcripts

 Jan 10, 2017 Zampa, Richard 01-09-16

Range: 155:22-156:6

Issues: Firebrick / Mixing

Swinerton

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22 Q. And was there any -- do you know what
23 refractory is? Brickwork?

24 A. Yes.

25 Q. Was there any refractory products at the

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1 Libbey-Owens-Ford glass plant?