AFFIDAVIT

STATE OF CALIFORNIA :
: ss:
COUNTY OF MONTEREY :

COMES NOW JOHN L. MYERS who, being first duly sworn, does depose and say:

My name is John L. Myers. I am presently employed by Union Carbide Corporation as Product and Production Manager - asbestos, a position which I assumed in July of 1981. From 1970 until that time I was Marketing Manager - asbestos. In that capacity I was responsible for marketing Union Carbide's "Calidria" asbestos products. I have personal knowledge of the facts recited in this affidavit.

Union Carbide mines chrysotile asbestos ore from a massive deposit in San Benito County, California. The ore is hauled about 55 road miles to a processing mill near King City, California. The mill, in operation since 1963, is owned and operated by Union Carbide and is the only source of asbestos fiber produced by Union Carbide. The asbestos fiber produced by Union Carbide is unique compared to all other known sources of chrysotile asbestos in that the fibers are very uniform in size, and all the fibers are within the microscopic range. The Union Carbide asbestos has a powdery consistency and does not appear fibrous as in the case of asbestos mined elsewhere. Union Carbide markets its chrysotile asbestos fibers, under the trade name "Calidria", for various industrial applications.

Chrysotile asbestos from other world-wide sources differs from "Calidria" asbestos in that the fibers vary in length from several inches down to microscopic size, but the shortest fibers are generally longer than the Union Carbide asbestos fibers. The substantially longer length of the fibers produced elsewhere makes them suitable for use in heat or frost insulation materials. On the other hand, the

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PLAINTIFF'S EXHIBIT
UC-1412

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uniformly short length of the "Calidria" asbestos fibers makes them unsuitable for use in heat or frost insulating materials. "Calidria" asbestos is sold to manufacturers or compounders who incorporate the fibers as a filler in drilling fluids, floor tile and asphalt compounds, as a reinforcer in plastics, as a thixotrope in resins, and in similar applications where the fibers, after incorporation, are not respirable.

To my knowledge Union Carbide has never sold "Calidria" asbestos for use in heat or frost insulating materials, nor has "Calidria" asbestos ever been made a part of such materials, nor has Union Carbide manufactured or sold such materials containing asbestos from any source.

FURTHER AFFIANT SAITH NOT.

John L. Myers
John L. Myers

Sworn to before me this 27 day of April, 1982.

Chris G. Davis
Notary Public

OFFICIAL SEAL
CHRIS G DAVIS
NOTARY PUBLIC - CALIFORNIA
MONTEREY COUNTY
My comm. expires MAR 1, 1985

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Union Carbide trial exhibit UC-1412: Affidavit of John L. Myers on Calidria Asbestos Production, Fiber Length and U... Published by AsbestosClaims.Law
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