PLAINTIFF'S EXHIBIT

UC-5325

BROBECK, PHLEGER & HARRISON
One Market Plaza
Spear Street Tower
San Francisco, CA 94105
Telephone: (415) 442-0900

Attorneys for Respondent
Union Carbide Corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

In re:	No. 828-684
COMPLEX ASBESTOS LITIGATION	UNION CARBIDE CORPORATION'S RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES TO DEFENDANTS [General Order No. 29]

UNION CARBIDE CORPORATION ("Union Carbide"), responds to Plaintiffs' Standard Interrogatories To Defendants (General Order No. 29) as set forth below. Inquiries regarding these answers should be directed to John E. Carlson of Brobeck, Phleger & Harrison.

Each of the following responses is rendered and based upon information, reasonable inquiry, diligence and recollection at the time of the preparation of these responses. Discovery is continuing and will continue as long as permitted by court order, General Order, statute or stipulation of the parties. Union Carbide's investigation will continue to and through the trial of any individual action. New information may aid recollection of events. Union Carbide specifically reserves the right at time of

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trial to introduce any evidence from any source which may hereafter be discovered and documents which may be hereafter discovered.

Many of the interrogatories herein are unsuitable to Union Carbide, its former subsidiary, its intermittent chrysotile mining operations and its manufacture of other products which contained minimal, almost negligible, amounts of asbestos. Nonetheless, in the interest of compliance with General Order No. 29, Union Carbide has provided information as to each interrogatory.

These answers are not applicable to Union Carbide Agricultural Products, Co., Inc. ("Amchem"). Separate answers will be provided for Amchem.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

With respect to the individual verifying these answers on your behalf, state the following:

(a) Their name;

(b) Their present business address;

(c) Their present job title;

(d) Their date of first employment with you, and the dates and titles of each job position they have held while they were employed by you.

RESPONSE TO INTERROGATORY NO. 1:

(a) John Macdonald

(b) Old Ridgebury Road, Danbury, Connecticut

(c) Assistant Secretary, Union Carbide Corporation

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INTERROGATORY NO. 2:

Please state whether or not you are a corporation, and if so, state:

(a) Your correct corporate name;

(b) Your state of incorporation;

(c) The date of your incorporation;

(d) The address of your principal place of business;

(e) Whether or not you have ever held a certificate of authority to do business in this state, and if so, the inclusive dates of any certificate;

(f) Whether or not you have a registered agent for the purpose of accepting service of process in this state, and if so, their name and present address;

(g) If you are wholly-owned or the majority interest of your company is owned by another business entity, state that entity's name and principal place of business.

RESPONSE TO INTERROGATORY NO. 2:

(a) Union Carbide Corporation

(b) New York

(c) November 11, 1917

(d) Old Ridgebury Road, Danbury, Connecticut 06817

(e) Yes -- July 31, 1942 to present

(f) Corporate Trust Corporation System, 800 South Figueroa Street, Suite 1000, Los Angeles, California 90017

(g) Not applicable

INTERROGATORY NO. 3:

Have you ever been identified, known, or done business under any other name? If so, please state such name or names and

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the time period during which this defendant was so known or identified.

RESPONSE TO INTERROGATORY NO. 3:

Union Carbide and Carbon Corporation.

November 11, 1917, to April 30, 1957.

INTERROGATORY NO. 4:

State whether you have controlled, purchased, or in any way acquired any interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold, supplied, distributed and/or otherwise placed asbestos or asbestos-containing products in the stream of commerce, and if so, state:

(a) The name and address of said corporation or business entity;

(b) The dates you controlled, purchased or acquired any interest; and

(c) Set forth the nature of the business as it pertains to asbestos.

RESPONSE TO INTERROGATORY NO. 4:

(a), (b) and (c) Union Carbide never acquired the assets or assumed the liabilities of any corporation which was associated with Union Carbide's CALIDRIA asbestos business.

Union Carbide acquired Amchem Products, Inc., in 1977, and has since sold the company. Amchem will answer these interrogatories separately.

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In 1939, Union Carbide acquired Bakelite Corporation, which manufactured a product called BAKELITE. In the form in which it was sold, the asbestos in BAKELITE was encapsulated. See Response to Interrogatory No. 10.

Effective April 2, 1984, the Calidria asbestos operations of Union Carbide were transferred to Calidria Corporation, which was, at the time, a wholly-owned subsidiary of Union Carbide.

INTERROGATORY NO. 5:

Since 1930, at any time did you own any shares of stock or otherwise have an ownership interest in a company that either mines, produces, or sells raw asbestos fiber? If the answer is in the affirmative, state the following:

(a) The name of such corporation or entity;

(b) The date of incorporation or charter;

(c) The state or country of incorporation;

(d) Each ownership interest owned in each corporation, setting forth any change in such interest;

(e) The date such interest was acquired;

(f) The date of formation of such corporation or entity;

(g) The names of all shareholders owning more than 5% of the shares of stock of such corporation;

(h) The date such interest changed or terminated, if applicable;

(i) The name and location of each asbestos mine so owned;

(j) The grade and type of asbestos mined at each mine.

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RESPONSE TO INTERROGATORY NO. 5:

(a) Calidria Corporation

(b) March 6, 1984

(c) Delaware

(d) 100% ownership until sale on or about April 2, 1984

(e) March 6, 1984

(f) See response to Section (b)

(g) Not applicable

(h) On or about April 2, 1984

(i) Coalinga, California

(j) CALIDRIA is a short-fiber, chrysotile asbestos produced and marketed in pellet and fibrous form

INTERROGATORY NO. 6:

Please state the following:

(a) The address where the corporate records of this defendant are currently located; and

(b) The name, job title, and current address of the custodian for this defendant's corporate records.

RESPONSE TO INTERROGATORY NO. 6:

(a) and (b) Ms. Marcia Wilkins, Custodian of Records
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

INTERROGATORY NO. 7:

Please state whether this defendant, between 1930 and 1985, has ever engaged in the following activities with regard to raw asbestos fiber, and if so, please state the inclusive dates of such activity:

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(a) Mining;

(b) Milling;

(c) Supply;

(d) Importing;

(e) Processing;

(f) Distribution;

(g) Marketing;

(h) Sale.

RESPONSE TO INTERROGATORY NO. 7:

(a) 1963-1985

(b) 1963-1985

(c) 1963-1085

(d) No

(e) 1963-1985

(f) 1963-1985

(g) 1963-1985

(h) 1963-1985

INTERROGATORY NO. 8:

Please state whether this defendant, between 1930 and 1985, has ever engaged in the following activities with regard to asbestos-containing products, and if so, please state the inclusive dates of such activity:

(a) Supply;

(b) Importing;

(c) Distribution;

(d) Marketing;

(e) Sale;

(f) Labeling;

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(g) Manufacturing.

RESPONSE TO INTERROGATORY NO. 8:

Yes. Please see Response to Interrogatory No. 10.

INTERROGATORY NO. 9:

If your answer to Interrogatory No. 7 regarding "raw asbestos fiber" is in the affirmative, please state the following:

(a) The trade, brand name, and/or generic name of each such raw asbestos fiber mined, milled, supplied, distributed, processed, imported, labeled, and/or marketed in any form or quantity between 1930 and 1985;

(b) The date(s) each such raw asbestos fiber was first placed on the market, including the date(s) each such raw asbestos fiber was first marketed:

(i) on an experimental basis;

(ii) on a test basis; or

(iii) for sale.

(c) The date(s) each such raw asbestos fiber:

(i) ceased to be produced; or

(ii) was recalled from the market, if ever.

(d) A description of the chemical composition of each such raw asbestos fiber, including the type and/or grade of asbestos;

(e) A description of the physical appearance and nature of each such raw asbestos fiber, including any color coding, distinctive marking and/or logo;

(f) A detailed description of the intended use of each such raw asbestos fiber, including any temperature limits for

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each such use;

(g) Whether such raw asbestos fiber was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

(h) Whether any of this defendant's "raw asbestos fibers" have, at any time, been sold to any companies (including power companies or utilities), shipyards, distributors, refineries, suppliers and/or manufacturers in the defined geographic area. If so, please state:

(i) The names of each such company, shipyard, distributor, supplier, manufacturer or refinery;

(ii) The inclusive dates of each such sale, and the amount (volume) and the trade or brand name of each such raw asbestos fiber sold;

(iii) Whether you have any records indicating any such sale and, if so, the name, address and job classification of each individual who currently has possession of such records.

(i) Describe the types of records sufficiently to identify them for discovery purposes which set forth any of the foregoing information and the custodian thereof (giving name and address) of each such records.

RESPONSE TO INTERROGATORY NO. 9:

(a) CALIDRIA

(b) 1963

(c) CALIDRIA asbestos is still being mined, milled, and sold, now under the ownership of KCAC Corporation.

(d) CALIDRIA, a chrysotile asbestos, is marketed as new asbestos in fibrous and pellet forms. The chemical composition

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of basic CALIDRIA asbestos is $Mg_6 (OH)_8 Si_4O_{10}$. Various treated forms of CALIDRIA are also sold, and these may have additional chemical components.

(e) Pellets or fine white powder.

(f) CALIDRIA asbestos is marketed through non-exclusive distributors to manufacturers who in their manufacturing have need for asbestos having the qualities of CALIDRIA for use as a filler, reinforcer, opacifier, thixotrope or thickener. Union Carbide if informed and believes that CALIDRIA cannot be used for purposes other than as stated above primarily due to its quality and composition, in particular the naturally-occurring short length of its fibers. Specifically, CALIDRIA asbestos is not suitable for, nor intended for, asbestos cement, insulation, friction products, or textile products.

(g) No.

(h) Sales records reviewed by Union Carbide to date indicate that the following sales were made to companies within the "defined geographic area . . ."

Kaiser Gypsum, Antioch, from 1970 through 1976

Rich-Tex Corporation, Richmond, from 1970 through 1977

Fibreboard Corporation, Martinez, in 1972 (40 lbs. only)

Since 1968, Union Carbide sold CALIDRIA to distributors, who in turn sold to users, in the "defined geographic area." These distributors included Harrisons & Crosfield (Pacific), Inc., from 1968 to 1985, and Van Waters & Rogers, in 1970 and 1971. Through these distributors, sales to other companies in

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the "defined geographic area" have also been made. Records reviewed by Union Carbide to date indicate that such sales were made, in 1984, to the following companies:

Adhesive Engineering
Asphalt Products Oil Corp.
Hysol-Dexter
Intercoastal Co.
Mica-Kote
Pronto Plastics
Royell, Inc.
Seal Tuff Paint Co.
Terralite
Union City Ind.
Hexcel Corp.

Further records reflecting sales in the "defined geographic area" for other years since 1968 may be in the possession of Harrisons & Grosfield (Pacific), Inc., Emeryville, CA.

(i) See Response to (h) above and to Interrogatory No. 6.

INTERROGATORY NO. 10: For any asbs containing products Ufon may have ordered -

If your answer to Interrogatory No. 8 regarding "asbestos-containing products" is in the affirmative, please state the following:

(a) The trade, brand name, and/or generic name of each such asbestos-containing product sold, supplied, distributed, processed, imported, labeled, manufactured, and/or marketed in any form or quantity between 1930 and 1985;

(b) The date(s) each such asbestos-containing product

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was first placed on the market, including the date(s) each such asbestos-containing product was first marketed:

(i) on an experimental basis;

(ii) on a test basis; or

(iii) for sale.

(c) The date(s) each such asbestos-containing product:

(i) ceased to be produced; or

(ii) was recalled from the market, if ever.

(d) A description of the chemical composition of each such asbestos-containing product, including the type and/or grade of asbestos and/or asbestos fiber contained in each such product and the quantitative percentage of asbestos or asbestos fiber in each such product;

(e) A description of the physical appearance and nature of each such asbestos-containing product, including any color coding, distinctive marking and/or logo;

(f) A detailed description of the intended use of each such asbestos-containing product, including any temperature limits for each such use;

(g) Whether any such asbestos-containing product was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

(h) The name and address of the suppliers of the raw asbestos fiber used in each such product and the time period of such supply;

(i) Whether any of this defendant's "asbestos-containing products" have, at any time, been sold to any companies (including power companies or utilities), shipyards,

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distributors, refineries, suppliers and/or manufacturers in ~~the defined~~ Northern California geographic area. ~~If so, please state~~:

(i) The names of each such company, shipyard, distributor, supplier, manufacturer or refinery;

(ii) The inclusive dates of each such sale, and the amount (volume) and the trade or brand name of each such asbestos-containing product sold;

(iii) Whether you have any records indicating any such sale and, if so, the name, address and job classification of each individual who currently has possession of such records.

(j) Describe the types of records sufficiently to identify them for discovery purposes which set forth any of the foregoing information and the custodian thereof (giving name and address) of each such records.

RESPONSE TO INTERROGATORY NO. 10:

Listed below are the few "asbestos-containing" products sold, manufactured, etc., by Union Carbide Corporation. In each instance, the asbestos contained in the product was encapsulated or otherwise bound in such a fashion that it was not respirable. None of these products were used in hot or cold insulation.

BAKELITE --

(a). BAKELITE

(b) Union Carbide acquired the Bakelite Corporation in 1927 and first marketed BAKELITE thereafter.

(c) (i) 1975

(ii) Not applicable.

(d) - (f) BAKELITE was a phenolic molding compound,

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marketed by Union Carbide through distributors to electrical and electronic parts manufacturers, used for molding into many types of electrical and electronic parts and products such as switches, switch boxes, radios, plug-in receptacles and the like. Although BAKELITE contained asbestos (Canadian short fibers were used exclusively, except for one year in which CALIDRIA was used experimentally), each asbestos fiber was encapsulated in resin and therefore not sold to the distributors in a respirable form.

(g) Unknown to Union Carbide at this time.

(h) It appears that the majority of asbestos used in BAKELITE was obtained from Carey-Canadian Mines. Other suppliers included Ruberoid Company, Johns-Manville Co. Ltd., and Asbestos Corporation Ltd.

(i) Because Union Carbide stopped marketing BAKELITE in 1975, it has not been able to locate records indicating the identity and location of customers. Discovery is continuing.

(j) None have been located as of this time. Discovery is continuing.

UDEL Polysulfone P 6050 --

(a) UDEL Polysulfone P 6050

(b) Unknown at this time. Discovery is continuing.

(c) (i) 1977

(ii) Not applicable.

(d) - (f) UDEL Polysulfone P 6050 was a high temperature, high rigidity thermoplastic molding compound. To Union Carbide's knowledge, it was used primarily in the manufacture of camera cases.

(g) Unknown to Union Carbide at this time.

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(h) Unknown to Union Carbide at this time.

(i) Because Union Carbide stopped marketing UDEL Polysulfone P 6050 in 1977, it has not been able to locate records indicating the identity and location of customers. Discovery is continuing.

(j) None have been located at this time. Discovery is continuing.

PRESTONE Antifreeze, Sealer-Stop Leak, Heavy Duty Sealer --

(a) PRESTONE Antifreeze

PRESTONE Sealer-Stop Leak

PRESTONE Heavy Duty Sealer

(b) - (c) PRESTONE Antifreeze contained miniscule asbestos from 1969 to 1971. PRESTONE Sealer-Stop Leak contained miniscule asbestos from 1953 to 1972. PRESTONE Heavy Duty Sealer contained miniscule asbestos from 1958 to 1972.

(d) - (f)

(g) No.

(h) Unknown to Union Carbide at this time.

(i) These consumer products were sold on a national basis, including the "defined geographic areas."

(j) None have been located at this time. Discovery is continuing.

Acetylene Cylinder Liners --

(a) PRESTOLITE and Linde acetylene cylinder liners.

(b) PRESTOLITE liners were placed on the market by a predecessor of Union Carbide in 1904. Linde liners were introduced in 1917.

(c) The Linde Division ceased marketing cylinders in

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1983, and Union Carbide ceased marketing all cylinders in 1985.

(d) Acetylene cylinders manufactured by Union Carbide consist of a steel shell and valve and completely enclosed therein a solid porous monolithic calcium silicate filler which contains one percent (1%) chrysotile asbestos by volume. The asbestos was entrapped and encapsulated in a solid porous filler enclosed in a welded steel shell.

(e) Acetylene cylinder liners ranged in size from 3" diameter 12" high. The porous mass contained therein is a hard, white monolithic structure, resembling plaster of paris in appearance.

(f) Acetylene cylinders are used for the storage, transportation and dispensing of acetylene gas which is a multiple purpose fuel gas.

(g) Unknown. Discovery is continuing.

(h) Unknown. Discovery is continuing.

(i) Yes.

(j) None have been located at this time. Discovery is continuing.

INTERROGATORY NO. 11:

If any of the distributors identified in your answer to Interrogatory Nos. 9 and 10 above was an exclusive distributorship, please so state and identify the relevant time period.

RESPONSE TO INTERROGATORY NO. 11:

Not applicable.

INTERROGATORY NO. 12:

If this defendant entered into any agreements for the rebranding of any asbestos-containing product(s) and/or

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material(s) mined, imported, manufactured, sold, distributed, and/or supplied by this defendant for resale or distribution by another company, describe each agreement's terms and the parties to said agreement, the duration of the agreement, and name of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 12:

Not applicable.

INTERROGATORY NO. 13:

If this defendant entered into any agreements for the rebranding of asbestos-containing products and/or materials mined, imported, manufactured, sold, distributed, and/or supplied by another company for resale or distribution by your company, describe each of the agreements and the parties to said agreement, the terms, the duration, and the names of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 13:

Not applicable.

INTERROGATORY NO. 14:

State whether any asbestos used, processed, mined, manufactured, imported, supplied, distributed, labeled, and/or sold by this defendant was purchased from or acquired from the General Service Administration or any branch or agency of the United States government during the period 1930 to 1985. If your answer is in the affirmative, state:

(a) The name and address of the agency which supplied the asbestos;

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(b) The grade and types of asbestos purchased or acquired;

(c) The quantities of each type of asbestos purchased or acquired annually during the period 1930 to 1985;

(d) The means of packaging;

(e) The health warnings, if any, which accompanied each shipment of asbestos, and indicate when said warnings were first made part of the shipments.

RESPONSE TO INTERROGATORY NO. 14:

No.

(a) - (e) Not applicable.

INTERROGATORY NO. 15:

As to each such asbestos-containing product listed in defendant's preceding answers to interrogatories, did defendant put on such products or their containers any warning of their hazards to health by virtue of the asbestos content of such products? If so, state for each such warning:

(a) Each such warning with particularity, with regard to size, color, and location; whether the warning was contained on the material or on the container; whether the warning was printed, stamped, and/or placed on a tag; and nature and wording or other content. State whether you have any photographs thereof;

(b) The inclusive date on which you began using each such warning on each of your asbestos-containing products; and

(c) All changes you made in such warnings and the dates of such changes.

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RESPONSE TO INTERROGATORY NO. 15:

Union Carbide objects to this interrogatory on the ground that it assumes there was a health hazard associated with its products which contained de minimis amounts of wholly encapsulated asbestos which was not respirable. Given the fact that Union Carbide's asbestos-containing products had encapsulated asbestos, there was no health hazard. Reserving the above objection, Union Carbide responds: Yes. See Response to No. 16.

INTERROGATORY NO. 16:

As to any of the bags of raw asbestos fiber referred to in defendant's preceding answers to interrogatories, did defendant put on such bags any warning of the hazards to health by virtue of the asbestos contained therein? If so, state for each such warning:

(a) Each such warning with particularity, with regard to size, color, location, wording or other content; whether the warning was contained on the material or on the container; whether the warning was printed, stamped, and/or placed on a tag attached to the material or container;

(b) The inclusive dates each such warning was issued on your bags of raw asbestos fiber;

(c) All changes you made in such warnings, the dates of such changes, and the inclusive dates of such changes; and

(d) The name, address and job title of each person who presently has possession of samples or documents relating to the above warnings.

RESPONSE TO INTERROGATORY NO. 16:

(a) - (c) Union Carbide objects to this interrogatory

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which refers to "bags of raw asbestos fiber." As set forth in previous answers herein and as set forth below in the response to this Interrogatory, Union Carbide's practice of shrink-wrapping the individual containers of asbestos fiber and double-sealing the bags by shrink-wrapping the entire pallet precluded any "health hazard" that this interrogatory presumes. Moreover, as set forth above, most of the CALIDRIA chrysotile asbestos mined by Union Carbide was sold and shipped in a pelletized form, not as "raw asbestos fiber."

Reserving the above objections, and in the spirit and interest of full compliance with General Order No. 29, Union Carbide responds as follows regarding "raw asbestos fiber" and as to the pelletized form of CALIDRIA usually sold by Union Carbide.

(a) - (c) CALIDRIA was packaged in brown Kraft paper bags which were individually shrink-wrapped in plastic, placed on pallets and the entire pallet of bags was, in turn, shrink-wrapped in plastic. From 1975 to 1985, the shrink-wrapped pallets of CALIDRIA pellets and fiber wholly contained within the double shrink-wrapped bags were placed in air-tight metal containers which were, in turn, sealed.

Union Carbide printed two cautionary statements on its CALIDRIA packaging. The first cautionary statement was first used in June of 1968 and read as follows: "Warning: Breathing dust may be harmful. Do not breathe dust."

The second cautionary statement was prescribed by OSHA in 1972 and was first printed on CALIDRIA packaging in that year. This cautionary statement read as follows:

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"Caution. Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm."

Also, Union Carbide furnished its customers with written information warning them about the hazards associated with exposure to asbestos and the means of minimizing such hazards. This literature was prepared by Union Carbide personnel and by the Asbestos Information Association/North America. See response to Interrogatory No. 20 herein for further details.

(d) Marcia Wilkins
Custodian of Records
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

INTERROGATORY NO. 17:

With respect to each of your asbestos-containing products, state whether this defendant's name, a trademark, logos, color coding, or other identifying markings ever appeared on the actual product itself. If so, identify each such product, state when the practice to place such identifying markings upon the product was begun and when it ended, if applicable, and describe in detail the pertinent marking(s) and the purpose, if any, of such markings.

RESPONSE TO INTERROGATORY NO. 17:

Not applicable. As set forth in response to Interrogatory No. 9, Union Carbide formerly mined CALIDRIA chrysotile asbestos and was generally sold the asbestos in a pelletized form and occasionally in a white powder form. There was no Union

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Carbide trademark or any other trademark or writing placed on the "actual product itself" (i.e., the pellets or the powder).

As to the other products sold by Union Carbide which contained de minimis amounts of asbestos (as identified in response to Interrogatory No. 10), Union Carbide's name appeared on the containers of PRESTONE liquid and possibly on the PRESTO-LITE acetylene cylinders. Discovery is continuing as to PRESTO-LITE acetylene cylinders.

INTERROGATORY NO. 18:

Identify all present or former executives, officers, or other supervisory officials of defendant whose depositions have been taken by plaintiffs, other than those herein, in cases involving workers or their heirs who are suing this defendant or who have sued this defendant for illnesses or injuries allegedly caused, in whole or in part, by exposure to asbestos dust allegedly created by defendant's asbestos-containing products and/or raw asbestos fibers. Identify the name of the case, the court of filing, the court docket number, and the date of the deposition.

RESPONSE TO INTERROGATORY NO. 18:

(1) John L. Myers

Lester Rice v. Union Carbide Corporation, U.S.D.C., District of South Carolina, Civil Action No. 81-977-9, April 9, 1982.

Simon DeWard v. Johns-Manville, et al., Superior Court for the County of Los Angeles, Civil No. C-298717 (and related cases), August 30, 1984.

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(2) Carl U. Derndehl, M.D.

Henry Garry v. Union Carbide, United States District Court, Eastern District of Arkansas, Western Division, Civil No. LR-C-83-921 (February 11, 1985).

INTERROGATORY NO. 19:

Between the years 1930 and 1985, did this defendant purchase or otherwise acquire any asbestos-containing product line from another company? If so, please state for each such purchase:

(a) Date of contract of sale;

(b) Terms of purchase and sale agreement, or if you will do so without a motion to produce, attach a copy of said agreement(s) to your answers;

(c) Trade, brand, and/or generic name of each such product line so acquired;

(d) Name of company from whom you purchased each such asbestos-containing product line; and

(e) Location of any manufacturing facilities so acquired, and the type of asbestos products manufactured therein.

RESPONSE TO INTERROGATORY NO. 19:

See Response to Interrogatory No. 10.

INTERROGATORY NO. 20:

Identify all brochures, pamphlets, catalogs or other advertising relating to asbestos-containing products and/or raw asbestos fibers which this defendant manufactured, sold, distributed or supplied from the year 1930 to 1985. For each such document please state:

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(a) A description of the document;

(b) The year it was printed;

(c) The period of time in which it was used;

(d) The purpose of such document;

(e) Whether the documents or copies of said document presently exist;

(f) If said documents or copies still exist, where they are located; and

(g) The name, job title, and current address of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 20:

(a) - (d) Set for below is an itemized listing of brochures and materials which Union Carbide made available to its customers, potential customers, and distributors from time to time regarding CALIDRIA asbestos. These materials, which were designed to impart information about the nature, use, and handling of the various CALIDRIA forms, may no longer be in use in some cases and copies thereof may no longer be in Union Carbide's possession, custody, or control.

I. GENERAL

A - "Calidria" Booklet.

B - Asbestos Fibers - REB.

C - Business Reply Card.

D - Rubber Booklet.

E - Grinding Asbestos Pellets.

F - FDA Status-Asbestos in Paper.

G - New Additives Induce Thixotropy - Reprint of JLM Speech.

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H - New Idria Chrysotile An Unusual Ore Yields New Products - RGW.

I - Cationic Asbestos for Waste Water.

J - Asbestos Products for Oil Pollution Control.

K - Zeta Potentials of Some Minerals.

L - US Patent Office RGW - Waste and Water Treatments.

M - Mineralogy of the Coalinga Asbestos Deposit - FAM & CST.

N - Bulk Handling Demonstration.

O - Electron Micrograph Illustrations.

P - Asbestos Magazine Reprint - JLM - Pellets.

Q - Rubber World Reprint.

R - Suggested Primer Sealer for Masonry and Weathered Roofing, 3JG-123B.

S - Suggested Exterior White Hi-Build Flexible Coating, 3JG-124B.

T - Suggested Exterior White Insulating Roof Coating, 3JG-121B.

U - Suggested Weather-Barrier Roof Coating and Lagging Compound, E-1297.

II. <u>RESIN GRADE PRODUCTS</u>

A - General

1. "Calidria" RG-144 & RG-244.

2. Use of Cowles Dissolver.

3. "Calidria" RG Products for Vinyl Plastisol Sealant Applications.

4. "Calidria" Asbestos for a High Build Dip Coating Plastisol NF-12.

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5. "Calidria" RG-144 & RG-244 Asbestos in PVC Plastisols.

6. Rubber Research Elastomerics.

7. Plasticizer Viscosity Control with "Calidria" Asbestos RG-244 & RG-144.

B - RG-110 (Price Schedule)

1. Viscosity Control Agent for Asphaltic Compounds.

2. Polyester Premixes Comparative Cost & Performance Data.

C - RG-144 (Price Schedule)

1. RG-144 Brochure.

2. RG-144 Performance Data.

3. RG-144 Product Characteristics.

4. RG Asbestos Improves Thixotropic Properties of Highway Markers.

5. PVP Reprint.

6. Asbestos Beefs Up Plastics & Adhesives to Extend Their Use.

D - RG-244 (Price Schedule)

1. RG-244 Brochure.

2. RG-244 Comparative Performance Characteristics.

3. RG-244 Product Characteristics & Specifications.

4. Ultrasonic Dispersion of RG-244.

5. RG-244 as a Thixotrope for Polyester Resins.

6. Polyester Putty & Patching Compounds.

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7. "Epoxy Coal Tar Coatings."

8. "Chlorinated Rubber Roofing Compound."

9. High Build Vinyl Maintenance Paints.

10. Zinc-Rich Primers.

11. Vinyl Coal Tar Formulation Suggestions.

12. Formulating Plastisol Sealants with Silane Adhesion Promoters.

13. RG-244 Health Brochure.

E - RG-600 Brochure

1. Cost Effectiveness Optimization of Reinforced Polyolefins; 10/4/76 (Ancker & Leung).

2. RG-600 Inquiry Form.

3. Coupled Chrysotile Asbestos Reinforced Thermoplastics (Ancker).

4. RG-600 Request Form.

5. RG-600 Patent Literature - 3,938,278 December 23, 1975.

6. RG-600 Health Brochure.

7. Reinforced Polyolefins for Large Structural Foam Parts; 2/8-11/77.

8. Structural Foam is launched into an era of great diversification; August 1976.

III. STANDARD GRADE PRODUCTS

A - General

1. "Calidria" Asbestos Standard Grade Products, Typical Properties.

B - SG-100 (Price Schedule)

1. SG-100 "Calidria" Asbestos for use in Vinyl

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and Asphalt Floor Coverings.

2. SG-100 Saves Up to One-Half (1/2) the Amount of Asbestos.

3. Flintkote Report.

C - SG-1130 (Price Schedule)

D - SG-200/SG200X (Price Schedule)

E - 1. SG-200/SG-200X Product Characteristics

F - SG-210 (Price Schedule)

1. "Calidria" Asbestos SG-210 for Dry Mix Tape Joint Compounds.

2. TJC Brochure.

3. UCAR Latex 153 for Water-Based Caulks and Sealants.

4. Typical Product Characteristics and Specifications Sg-210.

5. Suggested Interior Texturing or Exterior Spackling Formulation (17-CHR-41).

IV. <u>HIGH PURITY</u>

A - General

1. Effects of Chrysotile Asbestos Additions to Cellulosic Paper - RGW.

2. "Calidria" High Purity Asbestos for Porosity Control, Pinhole Reduction, and Improvement in Two-Sidedness.

3. Properties of Asbestos Suitable for Use in Cellulosic Paper.

4. How High Purity Asbestos is used for Pitch Control in Papermaking.

5. Paper Trade Journal - Asbestos Product Aids

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Retention, Boosts Opacity and Disperses Pitch.

6. "Calidria" Asbestos for Paper Coatings.

B - High Purity Open (Price Schedule for HPO & HPP)

1. Typical Product Characteristics for HPO.

2. The Trial of Calidria HPO in New Rochelle Water Pollution Control Plant.

3. Addition Rates for HPO in Primary Waste Treatment.

4. Suggested Dark Green Acrylic Tennis Court Topcoat E-1400.

C - High Purity Pellets

1. Typical Product Characteristics for HPP.

V. TITANATED PRODUCTS

A - T-135 (Price Schedule)

1. T-135 Opacifying Agent.

2. "Calidria" Asbestos T-135 for Viscosity Control & Pigmentation.

3. T-135-O for Spray Acoustic & Texture Compounds.

4. Chemical 26 Reprint - Checking Opacity.

VI. COATING GRADES

A - OG-135 (Price Schedule)

VII. DRILLING

A - Oil and Gas Journal Reprint

In addition, the following material, some of which is listed above in the form of brochures, articles or addresses, has been prepared:

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1. "CALIDRIA Asbestos RG-244 - An Economical Effective Thickener and Thixotrope for Polyester Resins, Plastisols, Epoxies, Phenolic Adhesives Organosols" - 9/70.

2. "CALIDRIA Asbestos, Resin-Grade 144, an Effective Low Cost Thickening Agent and Thixotrope for Epoxy Resin Systems" - 7/71.

3. "CALIDRIA Asbestos Resin-Grade - 144 and Resin-Grade 244."

4. "CALIDRIA Asbestos, Low Cost Highly Effective Reinforcer and Filler for Rubber, Two Grades: High-Purity and T-135" - 10/70.

5. "CALIDRIA Asbestos, a Unique and Versatile Fiber with Proven Applications as an Extender, Thickener, Reinforcer, Opacifier" - 5/74.

6. "New Additives Induce Thixotropy, Provide Sag and Viscosity Control," presented by John L. Myers to Western Coatings Technology Society Meetings in Denver, Los Angeles, San Francisco, Portland, Seattle and Vancouver, in May 1969.

7. "Asbestos," by Robert E. Byrne, Jr., Area Manager, CALIDRIA Asbestos Marketing and Technology, Mining and Metals Division, Union Carbide Corporation, published March, 1972 in Modern Plastics Encyclopedia, McGraw-Hill, Inc.

VIII. HEALTH AND SAFETY

A - General

1. "Material Safety Data" for CALIDRIA Asbestos published September 1, 1972 and revised September 1, 1976 by Union Carbide Corporation.

2. "Chrysotile Asbestos in Plastics," presented

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May 14, 1974 at the 32nd annual technical conference of the Society of Plastics Engineers at San Francisco, by John L. Myers, Marketing Manager, Asbestos, Union Carbide.

3. "Handling Asbestos - Chrysotile Asbestos in Plastics," June 16, 1975, by John L. Myers, Marketing Manager, Asbestos, Union Carbide.

4. "Grinding CALIDRIA Asbestos Pellets," by Robert E. Byrne, Jr., Area Manager, CALIDRIA Asbestos, Marketing and Technology, Mining and Metals Division, Union Carbide Corporation.

5. Brochure "'CALIDRIA' Asbestos Pellets - Health and OSHA Information," published November 1, 1977 by Metals Division, Union Carbide Corporation, Niagara Falls, New York.

6. "Consumer Safety in Plastics Systems Containing Bound Asbestos Fibers," presented on November 9, 1977 at the NATEC meeting of the Society of Plastics Engineers at Denver by Dr. H.B. Rhodes, Manager Marketing Services - Asbestos, Union Carbide.

B - RG-244

1. Brochure "'CALIDRIA' Asbestos RG-244 - Health and OSHA Information," published February 1, 1975 and revised October 1, 1977 by Marketing and Technology Department, Mining and Metals Division, Union Carbide Corporation, Niagara Falls, New York.

2. "'CALIDRIA' Asbestos RG-244 - Typical Chemical Analysis," date of publication unknown.

Union Carbide no longer maintains records regarding the advertisements it may have placed promoting CALIDRIA asbestos

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prior to 1966. Therefore, Union Carbide has answered this interrogatory insofar as it has records.

Union Carbide has advertised CALIDRIA asbestos and its applications in several trade journals. In response to subparts (a), (b), (c) and (d) of this interrogatory, Union Carbide provides the following:

"Calidria" Asbestos

Journal Advertising Summary

Journal	Page(s)	Date(s)	Photographs Or Diagrams
"Chemical 26"	Unknown	7/66	Yes
"Chemical 26"	17	9/66	Yes
"TAPPI"	44A-45A	2/66	Yes
"TAPPI"	141A	3/66	Yes
"TAPPI"	155A	12/66	No
"TAPPI"	157A	12/66	Yes
"TAPPI"	149A	1/67	No
"TAPPI"	151A	1/67	Yes
"TAPPI"	153A	1/67	Yes
"TAPPI"	131A	2/67	Yes
"TAPPI"	133A	2/67	Yes
"Pulp & Paper"	Unknown	5/2/66	Yes
"Pulp & Paper"	Unknown	5/2/66	Yes
"Pulp & Paper"	15	6/20/66	Yes
"Pulp & Paper"	9	11/21/66	Yes
"Pulp & Paper"	11	11/21/66	Yes
"Pulp & Paper"	55	12/5/66	No

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Journal	Page(s)	Date(s)	Photographs Or Diagrams
"Pulp & Paper"	57	12/5/66	Yes
"Pulp & Paper"	45	12/19/66	Yes
"Pulp & Paper"	79	1/30/67	No
"Pulp & Paper"	81	1/30/67	Yes
"Pulp & Paper"	83	1/30/67	Yes
"Pulp & Paper"	65	2/20/67	Yes
"Paper Trade Journal"	4-5	3/7/66	Yes
"Paper Trade Journal"	37	1/9/67	Yes
"Paper Trade Journal"	35	2/6/67	No
"Paper Trade Journal"	37	2/6/67	Yes
"Paper Trade Journal"	83	2/20/67	No
"Paper Trade Journal"	85	2/20/67	Yes
"Oil & Gas & Petro-Chemical Equipment"	Unknown	10/66	Yes 1/
"Petroleum Equipment & Services"	Unknown	10/66	Yes 1/
"Drilling DCW"	Unknown	11/66	Yes 1/
"Petroleum Engineer"	Unknown	10/66	Yes 1/
"Rubber Red Book"	Unknown	1974 & 1975	Yes 2/

1/ This ad placed by Montello, Inc., a Union Carbide Distributor.

2/ This ad placed by Harwick Chemical, a Union Carbide Distributor.

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(e) Yes, in most cases.

(f) - (g) Ms. Jamie S. Akiyama
Custodian of Records
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

INTERROGATORY NO. 21:

Were any of the raw asbestos fibers identified in Interrogatory No. 9 sold, shipped or distributed to the General Services Administration (GSA)? If so, specify the type of raw asbestos fiber and state the period of time.

RESPONSE TO INTERROGATORY NO. 21:

Union Carbide has no record of any sales to the General Services Administration and has located no information to indicate that any such sales ever took place.

INTERROGATORY NO. 22:

Were any of the asbestos-containing products identified in Interrogatory No. 10 sold, shipped or distributed to General Services Administration (GSA)? If so, specify the name of the asbestos-containing products and state the period of time.

RESPONSE TO INTERROGATORY NO. 22:

Please see Response to Interrogatory No. 10.

Union Carbide has located no information to indicate such sales or shipments.

INTERROGATORY NO. 23:

Please state if you formed within your corporate structure an entity known as a "contract unit."

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RESPONSE TO INTERROGATORY NO. 23:

No.

INTERROGATORY NO. 24:

Please state whether or not any of your "contract units" were employed in the installation and/or removal of raw asbestos fiber and/or asbestos-containing products at any time in the defined geographic area for the years 1930 to 1985. If so, please state:

(a) The inclusive periods of time the contract units were working in the defined geographic area;

(b) The business addresses and names of the contract units;

(c) Any records showing the locations of the jobsites where the contract units worked, and if so, describe them sufficiently to identify them for discovery purposes, and their present custodian;

(d) Did your contract units work in any shipyards, refineries, power plants, utility companies, breweries, or other jobsites in the defined geographic area? If so, state the name of those jobsites and the dates the contract units worked at those jobsites;

(e) For each jobsite listed above, state the type and nature of the work that was done.

RESPONSE TO INTERROGATORY NO. 24:

Please see Response to Interrogatory No. 23.

INTERROGATORY NO. 25:

From 1930 to present, did you have insurance against liability for the design, manufacture, distribution and sale of

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asbestos-containing products?

RESPONSE TO INTERROGATORY NO. 25:

Yes.

INTERROGATORY NO. 26:

If your answer to the preceding interrogatory is in the affirmative, please state:

(a) Name and address of each insurance company;

(b) Date and number of each policy;

(c) Limits of each policy, including the deductible; and

(d) Name, address, and company position of person who has custody of each policy.

RESPONSE TO INTERROGATORY NO. 26:

Union Carbide has primary coverage under policy #OZM 578 450 with American Motorists Insurance Company. The limits of liability under the policy are $500,000 per occurrence, $1,000,000, aggregate. In addition, Union Carbide has various excess coverage sufficient to cover any amount anticipated in this litigation.

DATED: March _____, 1986

BROBECK, PHLEGER & HARRISON

By _____
John E. Carlson

Attorneys for Respondent
Union Carbide Corporation

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VERIFICATION OF JOHN MacDONALD

I, JOHN MacDONALD, declare:

I am the Assistant Secretary of Union Carbide Corporation. I am authorized by Union Carbide to verify Union Carbide Corporation's Responses to Plaintiffs' Standard Interrogatories To Defendants [General Order No. 29]. These responses were prepared by counsel for Union Carbide with the assistance of Union Carbide employees. I am informed and believe that the foregoing responses are true, correct and complete and I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

This declaration was executed in Danbury, Connecticut on April 2, 1986.

John MacDonald

Sworn to before me this
2nd day of April, 1986.

Notary Public

My Commission Expires April 1, 1991