

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STANLEY MIKYSKA and JOYCE MIKYSKA,
his wife,

Plaintiffs,

v.

UNION CARBIDE CORP., et al.

Defendants.

C.A. No.: 78 70769

Hon. James R. Harvey

SUPPLEMENTAL ANSWERS TO PLAINTIFFS' FIRST SET OF
INTERROGATORIES TO DEFENDANTS, BY DEFENDANT
ALLIED CHEMICAL CORPORATION

COMES NOW defendant, Allied Chemical Corporation, and for its supplemental answers to plaintiffs' First Set of Interrogatories to Defendants, states:

10. Answer: A limitation was placed on our PVC product relating to bottle manufacture, the restriction established by FDA placed standards on extractability.

There were also restrictions imposed on the extractability of PVC or additives used in pipe manufacture for drinking water service. These tests were run on pipe rather than the resin.

Allied ceased selling to the Mt. Clemens Ford Vinyl Plant in 1970. It has no other record or recollection of any restriction or limitation.

24. Answer: A system of inspection was used for the product. It was a standard quality control procedure that reviewed crude product as it was removed from the reactors in slurry form; dryer product and the product being packaged or loaded into bulk hopper cars. In addition, thief samples were occasionally withdrawn

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from hopper cars to provide a historical sample, insuring that quality was met. There were no tests relative to safety except that during later years of operation, we did sample the vapor space of hopper cars because of concern for the development of explosive conditions in such vapor spaces during the summer months.

Our primary concern in safety was related to maintenance of a TLV of 500 ppm of vinyl chloride as established at the time by the American Conference of Governmental and Industrial Hygienists. During the periods (1968, 1969, 1970) in which Allied sold its PVC product to the Mt. Clemens Ford Vinyl Plant, the material was not considered as really a toxic substance as it is known today.

25. Answer: Our product was subject to quality control inspections as previously identified. The PVC products were handled in accordance with the general safety manual and subject to the quality control tests related to the customers' specifications.

26. Answer: (a) Product was sampled at the reactor slurry as it exited the dryer and as it was packaged or loaded into bulk hopper cars. The inspections were performed to insure that it would meet customer specifications. In the case of Ford, specifications were very tight, demanding low volatility which translates into a low water and residual monomer content in the resin particle and high dryup time, which relates to the time required for the particle of resin to pick up a given quantity of plasticizer reflecting the porosity of the product. A very porous product was sent to Ford. It is probable that the resin had a low vinyl chloride content and would be amenable to the loss of any residual vinyl chloride in the pneumatic conveying equipment used to load and unload the product. Loss of vinyl

chloride would also occur during intensive mixing used for compounding and, in all probability, only a very minute trace of vinyl chloride existed in the resin by the time it reached the calendering state.

47. Answer: Air sampling was performed in the reactor prior to the entry of any employee into the reactor. It is believed that an organic vapor tester, probably that manufactured by MSA Co., was the type employed. The air in the polymerization building and the slurry building was under continual sampling and testing by automatic equipment, believed manufactured by the Williams Co. (California) to measure the explosivity. When a given percentage of the lower explosive limit was reached, additional air ventilation was automatically applied to the buildings. When approximately 75% of the lower explosive limit was reached, alarms were sounded and a deluge system initiated. This air sampling was directed towards safety in preventing a fire or explosion hazard.