

CAUSE NO. 97-09313

FRANK C. HOSINSKI, ET AL.           §     IN THE DISTRICT COURT OF  
                                              §  
VS.                                     §     DALLAS COUNTY, TEXAS  
                                              §  
OWENS-CORNING CORPORATION,   §  
ET AL.                               §     H-160TH JUDICIAL DISTRICT

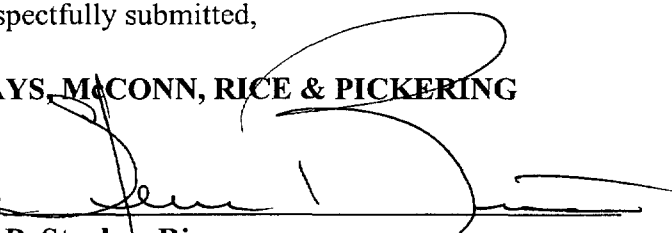
**DEFENDANTS SHELL OIL COMPANY AND  
PHILLIPS PETROLEUM COMPANY'S EXHIBIT LIST**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants **SHELL OIL COMPANY and PHILLIPS PETROLEUM  
COMPANY**, and hereby submit their trial exhibit list.

Respectfully submitted,

**HAYS, MACONN, RICE & PICKERING**

By: 

**B. Stephen Rice**

TSB No. 16838000

1200 Smith Street, Suite 400

Houston, Texas 77002

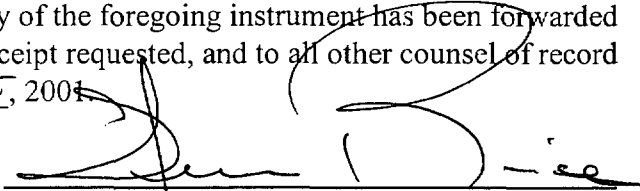
(713) 654-1111

(713) 655-9212 (Fax)

Attorneys for Defendants **SHELL OIL COMPANY  
and PHILLIPS PETROLEUM COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to counsel for Plaintiff by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this 4<sup>th</sup> day of Sept, 2001.

  
**B. Stephen Rice**

## DEFENDANTS' TRIAL EXHIBITS IN ASBESTOS CASES

1. Aug. 1938 Public Health Bulletin No. 241: A Study of Asbestosis in the Asbestos Textile Industry, by Dreessen, Dallavalle, Edwards, Miller, & Sayers
2. Nov. 1945 "Maximum Allowable Concentrations of Industrial Atmosphere Contaminants", by Warner Cook
3. Jan.-Nov. 1946 A "Health Survey of Pipe Covering Operations in Constructing Naval Vessels", in Journal of Industrial Hygiene & Toxicology, Vol. 28, by Walter Fleischer, Frederick Viles, Jr., Robert Gade, & Philip Drinker
4. 1947 "Clean Air: Removal of Dusts" issued by the US Dept. of Labor
5. 1948 "Industrial Hygiene & Toxicology", Vol. I, by Frank A. Patty
6. June 25, 1952 West Virginia State Health Department's Report on Industrial Hygiene Survey, Chesapeake & Ohio Railroad Shops, by Paul D. Halley, John Peathas, Harvey J. Roberts, & James Monnison
7. 1955 "Mortality from Lung Cancers in Asbestos Workers" by Richard Doll
8. Dec. 1, 1957 Occupational Health Regulations; Maximum Permissible Concentrations of Atmospheric Contaminants in Places of Employment from the Texas State Dept. of Health
9. June 1958 "An Epidemiological Study of Lung Cancer in Asbestos Mines" by Braun and Truan
10. 1959 "Asbestos, a Materials Survey", by Oliver Bowles from the US Dept. of the Interior
11. Feb. 15, 1960 Letter from Kenneth M. Lynch to F.W. Wilson on no knowledge of data on pleural mesothelioma being associated with asbestos dust exposure
12. Apr. 1960 "Diffuse Pleural Mesotheliomas & Asbestos Exposure in the North Western Cape Province", by J.C. Wagner
13. Jan. 14, 1961 "Diffuse Pleural Mesotheliomas in South Africa", by J.C. Wagner

14. May 19, 1961 "Ad Hoc Meeting to Discuss the Status of Knowledge Concerning the Effects of Exposure to Asbestos Dust on Health", by U.S. Public Health Service
15. 1962 Documentation of Threshold Limit Values, by American Conference of Governmental Industrial Hygienists
16. 1964 "Occupational Diseases--a Guide to Their Recognition" by W.M. Gafafer
17. 1965 Annals of New York Academy of Sciences
18. Sept. 1965 "Cancer Experiences of Several Occupational Groups Followed Prospectively," by John E. Dunn & John M Weir
19. 1966 Documentation of Threshold Limit Values, Revised edition, by American Conference of Governmental Industrial Hygienists
20. Sept./Oct. 1966 "Measurement of Dust Exposures in the Asbestos Textile Industry", by Jeremiah R. Lynch & Howard E. Ayer
21. Nov./Dec. 1967 "Testing Compliance with Threshold Limit Values for Respirable Dusts", by S.A. Roach, E.J. Baier, H.E. Ayer, & R.L. Harris
22. Jan. 1968 "Measurement of Asbestos Exposure", by Jeremiah Lynch & Howard Ayer from the Journal of Occupational Medicine
23. Jan. 1968 "Industrial Hygiene for Insulation Workers", by LeRoy Balzer from the Journal of Occupational Medicine
24. Apr. 22, 1968 "Evaluation & Control of Asbestos Exposure in the Insulating Trade", by W. Clark Cooper & LeRoy Balzer
25. May/June 1968 "Work Environment of Insulating Workers", by W. Clark Cooper & LeRoy Balzer
26. July 1968 "A Prospective Study of Mortality of Several Occupational Groups: Special Emphasis on Lung Cancer," by Dr. John E. Dunn, Jr. & Dr. John M. Wier (from Arch. Environ. Health-Vol. 17)
27. May 20, 1969 Federal Register: Safety & Health Standards, Part II, from the Department of Labor

28. October, 1969 "Asbestos and Health in 1969" by George W. Wright from the American Review of Respiratory Disease
29. 1969-1970 Tables XIII & XIV: Asbestos Concentration by Operation for Insulation Workers from 'Appendix X' of NIOSH Criteria Doc.
30. 1969-1972 Several Insulation Hygiene Progress Reports from Insulation Industry Hygiene Research Program:
- Spring 1969
  - Spring 1971
  - Summer 1971
  - Fall 1971
  - Summer 1972
31. 1969-1972 Various documents copied from the pipefitters & building & construction trades weekly newsletter & other documents (obtained from U.S. Dept. of Labor). See attached index.
32. 1969-1976 Compilation of inhalation hygiene progress reports, from the Insulation Industries Hygiene Research Program
33. Aug. 19, 1970 Deposition of Joseph Ralph Shrode given in *Porter v. Fibreboard*, C.A. No. 6329, U.S.D.C. E.D. Texas, and trial testimony given in *Borel v. Fibreboard*, C.A. No. 6449, U.S.D.C. E.D. Tex.
34. Sept./Oct. 1970 Interrelationships of Selected Asbestos Exposure Indices, by Jeremiah Lynch, Howard Ayer & Douglas Johnson
35. Dec. 1970 A Labor Management Occupational Health Service in a Construction Industry, by Irving R. Tabershaw, Clark Cooper, & LeRoy Blazer
36. 1970-1971 NICA Outlook (National Insulation Contractors Association) booklets:
- February, 1970
  - March, 1970
  - January, 1971
  - March, 1971
  - June, 1971
37. 1971 Asbestos: The Need for & Feasibility of Air Pollution Controls, from the National Academy of Sciences
38. 1971 "Fundamentals of Industrial Hygiene" by National Safety Council

39. 1971 Documentation of the Threshold Limit Values for Substances in Workroom Air, 3rd edition, by American Conference of Governmental Industrial Hygienists
40. Dec. 2, 1971 "Effects of Low Concentrations of Asbestos", by Murphy, et al (including Edward Gaensler)
41. Dec. 7, 1971 "OSHA Program Directive #6: Asbestos Dust, Emergency Standard Implementation"; and Rules and Regulations from the Federal Register and the ETS
42. 1971-1973 Various articles from the UA Journal, "Our Troubled Environment" section:  
- Nov. 1971  
- July 1972  
- Apr. 1973
43. 1972 "Criteria for a Recommended Standard . . . Occupational Exposure to Asbestos", from the U.S. Department of Health, Education & Welfare
44. 1972 Documents from the Exhibit List for the 1972 OSHA Asbestos Hearing.
45. May 1972 National Geographic Magazine
46. May 14, 1972 "Dust Exposure in Asbestos Processing", from Transactions of the 34th Annual meeting of the ACGIH, by Robert B. Weidner & Howard E. Ayer
47. Sept. 1972 "Carcinogenicity of Amosite Asbestos", by Selikoff, Hammond & Churg
48. Apr. 1973 "Health Hazard Evaluation/Toxicity Determination", by Raymond L. Hervin, et al (with National Institute for Occupational Safety & Health)
49. Dec. 1976 Revised Recommended Asbestos Standard, from National Institute for Occupational Safety & Health
50. 1979 Health Hazards of Asbestos Exposure, Annals of the New York Academy of Sciences, 1979

51. 1979 "Asbestos Exposure: Factors Associated with Excess Cancer and Respiratory Disease Mortality"
52. 1979 "Historical Background to the Asbestos Problem" by Selikoff & Lee
53. 1981 "Quantitative Estimates of Avoidable Risks of Cancer in the US Today" from The Causes of Cancer by Oxford Medical Publications ed. by Richard Doll and Richard Peto
54. Feb. 1982 "Mortality Study of Petroleum Refinery Workers: Update of Follow-up", prepared by Samuel D. Kaplan for the American Petroleum Institute
55. Oct. 8, 1982 "The Pathology of Asbestos Associated Diseases of the Lungs & Pleural Cavities: Diagnostic Criteria & Proposed Grading Scheme" (a special issue from the Archives of Pathology & Laboratory Medicine), by John E. Craighead, et al
56. Dec. 1982 Analysis of fiber release from certain asbestos products--draft final report, prepared by G.C.A. Corp. for U.S. Environmental Protection Agency (contains data on fiber release & concentrations)
57. 1983 Chapter 8 on Mesothelioma from Cancer Epidemiology by Edith Deborah Greenwald, M.P.H. and Edward S. Greenwald M.D.
58. June 10, 1983 "Non-asbestos Related Malignant Mesothelioma", by Theiderson, Greenberg & Buffler
59. 1985 "Asbestos Exposure--Quantitative Assessment of Risk", by Janet Hughes & Hans Weill
60. 1985 "Asbestos", a chapter from Mineral Facts & Problems, by the Bureau of Mines
61. Jan. 1985 "Alternatives to Asbestos in Asbestos Products", by A.A. Hodgson
62. 1986 "Asbestos as a Public Health Risk: Disease and Policy" from Annual Reviews : Public Health by Hans Weill and Janet M. Hughes
63. Mar. 1986 "Evaluation of Impairment/Disability Secondary to Respiratory Disorders", from the American Thoracic Society, by Attlilo D. Renzetti, Jr., M.D., et al

64. Apr. 1986 "Malignant Mesothelioma," by Andrew Churg
65. Apr. 1986 "The Diagnosis of Non-malignant Diseases Related to Asbestos" report of the Combined Committee of the American College of Chest Physicians & American Thoracic Society
66. 1987 "Mortality of Workers Employed in 2 Asbestos Cement Manufacturing Plants", from the British Journal of Industrial Medicine, by Janet Hughes, Hans Weill, & Yehia Hammad
67. 1987 "Epidemiology of Malignant Mesothelioma" from Asbestos-Related Malignancy ed. by Karen Antman M.D. and Joseph Aisner, M.D.
68. 1988 "Asbestos Health Effects: Resolving the Scientific Uncertainties", from the Post-graduate Medicine Journal, by Janet Hughes & Hans Weill
69. 1989 "Critical Review of Cancer Epidemiology in Petroleum Industry Employees, with a Quantitative Meta-analysis by Cancer Site," by Otto Wong & Gerhard Raabe
70. 1989 "Job Safety & Health for the Piping Industry" (a manual published by Plumbing Apprentice & Journeyman Training, Inc.)
71. 1989 "Progression of Asbestos Effects: A Prospective Longitudinal Study of Chest Radiographs & Lung Function", from the British Journal of Industrial Medicine, by R.N. Jones, J.E. Diem, Janet M. Hughes, Yehia Y. Hammad, H.W. Glindmeyer, & H. Weill
72. 1989 "Benign and Malignant Mesothelioma" from Cancer: Principles & Practice of Oncology, Vol. 2 3rd ed.
73. 1989 "Development and Use of Asbestos Risk Estimates" by J.M. Hughes and H. Weill; Reprinted from Non-Occupational Exposure to Mineral Fibers
74. Apr. 5, 1989 Deposition on Written Questions from *Russell Allen* case of Texas Dept. of Public Health - 1957 Occupational Health Regulations
75. May 19, 1989 "Asbestos Lung Disease: Current Controversies Regarding the Control & Prevention of Lung Cancer", by Andrew Churg
76. 1990 "The Health Benefits of Smoking Cessation: a Report of the Surgeon General" from the US Dept. of Health and Human Services

77. 1990 "Laryngeal Cancer and Asbestos" by Liddell
78. 1990 "U.S. Surgeon General: Health Benefits of Smoking Cessation"
79. 1991 "Asbestos in Public & Commercial Buildings: a Literature Review & Synthesis of Current Knowledge", by the Health Effects Institutes
80. 1991 "The Discovery of the Association Between Blue Asbestos & Mesotheliomas & the Aftermath", by J.C. Wagner
81. 1991 "Asbestosis as a Precursor of Asbestos Related Lung Cancer: Results of Mortality Study", from the British Journal of Industrial Medicine, by Janet Hughes & Hans Weill
82. 1991 "Benign and Malignant Mesotheliomas" from Comprehensive Textbook of Oncology 2nd ed
83. 1992 Chapter on Mesothelioma from Pathology of Asbestos-Associated Diseases ed. by Victor L. Roggli, M.D., S. Donald Greenberg, M.D., and Phillip C. Pratt, M.D.
84. March, 1992 "The Health Consequences of Smoking" by Polly A. Newcomb, Ph.D, and Paul P. Carbone, M.D. (Hon)
85. Apr. 1993 U.S. Bureau of Mines annual report on asbestos in 1992
86. Mar. 14, 1994 Deposition of Michael W. Cunningham, Local 22, re deaths of certain individuals - taken in *Rita Schmidt v. AC&S*
87. Dec. 1995 "The Lack of Causality Between Asbestos and Colorectal Cancer" from JOEM by William Weiss, M.D.
88. Mar. 15, 1996 Articles on the medical aspects of asbestos cases, particularly on cancer risk and attribution of lung cancer:
  - "The Diagnosis of Nonmalignant Diseases Related to Asbestos"
  - "Evaluation of Impairment/Disability Secondary to Respiratory Disorders" (American Thoracic Society, March 1986)
  - "Asbestos, Asbestosis, and Lung Cancer", an Editorial, Modern Pathology, Vol. 6, No. 5, September 1993
  - "Carcinoma of the Lung" from Pathology of Asbestos-Associated Diseases by Roggli, Greenberg and Pratt, 1992
  - "Pulmonary Fibrosis as a Determinant of Asbestos-Induced

- Lung Cancer in a Population of Asbestos Cement Workers" by Janet Hughes and Has Weill
  - "Is Asbestos or Asbestosis the Cause of the Increased Risk of Lung Cancer in Asbestos Workers?", an Editorial from British Journal of Industrial Medicine, 1986, by Kevin Browne
  - Medical Progress - Asbestos-Related Diseases" by Mossman and Gee, from the New England Journal of Medicine, June 29, 1989
  - "Exposure to Asbestos and the Risk of Gastrointestinal Cancer: a Reassessment" by Edelman, British Journal of Industrial Medicine, 1988
  - "Asbestos and Colon Cancer: Lack of Association in a Large Case-Control Study" by Garabrant, et al., 1992
  - "Fiber Toxicology," edited by David Warheit, DuPont
- 89.     undated           U.S. Navy film entitled "Insulating Hot & Cold Pipes"
- 90.     undated           "Asbestos-Related Disease in the Workplace and the Environment: Controversial Issues" from The Lung-Current Concepts, ed. by Andrew Churg, M. D.
- 91.     undated           "Asbestos, Asbestosis, and Lung Cancer" Editorial from Modern Pathology by Andrew Churg, M.D.
- 92.     undated           Articles on colon and other gastro cancers:
  - Ehrlich, Gordon & Dikman, 1991, "Carcinoma of the Colon in Asbestos-Exposed Workers: Analysis of Asbestos Content in Colon Tissue"
  - Seidman and Selikoff, 1986, "Decline in Death Rates Among Insulation Workers 1967-1986 Associated With Diminution of Work Exposure to Asbestos"
  - Edelman, 1988, "Exposure to Asbestos and the Risk of Gastrointestinal Cancer: a Reassessment"
  - Weiss, "Lack of Causality Between Asbestos and Colon Cancer"
  - Garabrant, 1992, "Asbestos and Colon Cancer: Lack of Association in a Large Case-Control Study"
  - Donham, et al, "The Effects of Long-Term Ingestion of Asbestos on the Colon of F344 Rats"
  - Frumkin, 1988, "Asbestos Exposure and Gastrointestinal Malignancy Review and Meta-Analysis"
- 93.     undated           "Asbestos and Disease" by Selikoff
- 94.     undated           Charts of Plaintiff's work history

95. 1943 "Safeguarding Petroleum Refineries and Their Workers" by Roy S. Bonsib
96. December 1999 "A Case Control Study of Lung Cancer Among Refinery Workers" by Rosamilia, Long, and Raabe
97. undated "What ? No Asbestos ?" A magazine advertisement for Asbestos Limited Inc.
98. undated Advertisement for Johns-Manville products referring to "asbestos the magic mineral"
99. undated Advertisement entitled "Asbestos in Action" from Keasbey & Mattison Company
100. undated U.S. Fuel Administration tag on "hints on saving coal"
101. Documents from Brown & Root Inc. as follows:
- (a) office memo dated 4/27/71 re: safety and health regulations for construction;
  - (b) office memo of 11/7/72 re: asbestos
  - (c) 11/16/72 office memo pertaining to asbestos
  - (d) 1/9/73 office memo concerning record keeping for asbestos
  - (e) 6/23/75 office memo regarding asbestos and fiberglass sampling
  - (f) 11/15/77 office memo, subject: asbestos
  - (g) 4/1/76 office memo re: asbestos record keeping requirements
  - (h) asbestos program - Brown & Root Inc. (undated)
  - (i) 1/14/76 office memo concerning respiratory protection and attached respiratory protection program
102. undated Mundy Industrial Maintenance's Procedures for Working Asbestos Insulation

## SHELL OIL COMPANY'S EXHIBIT LIST

| Exh. No. | Document Date | Description of Document<br>(To Include All Attachments)                                             | Batestamped No.   |
|----------|---------------|-----------------------------------------------------------------------------------------------------|-------------------|
| 1.       | 11/22/65      | Memo to refinery managers from H.M. Carr                                                            | ABS - 009745-9750 |
| 2.       | 10/1970       | Shell Houston Plant Safety Manual                                                                   |                   |
| 3.       | 12/8/70       | Memo to refinery managers; re: Hazards of Asbestos; from B.C. Bell                                  | DPMC-01225-01227  |
| 4.       | 3/2/71        | The Facts About Asbestos and Health by the Asbestos Information Association, North America.         | ABS-006729-006740 |
| 5.       | 1972          | Computer print out of Asbestos Exposure Data 1972-1979                                              | ABS-051802-051809 |
| 6.       | 2/1/72        | Memorandum regarding hazards of asbestos                                                            | DPMC-01228-01236  |
| 7.       | 3/10/72       | Memo to refinery managers; re: Industrial Hygiene; from G. Holzman                                  | DPMC-00969-00977  |
| 8.       | 4/17/72       | Memo to plant managers/superintendents; re: DOL-OSH Asbestos Handling Procedures; from R.L. Maycock | ABS-007453-007462 |
| 9.       | 6/28/72       | Memo to refinery managers; re: Hazards of Asbestos; from B.C. Bell                                  | DPMC-01237-01243  |
| 10.      | 7/19/72       | Letter to Shell Chemical Company from Thorpe Products Company                                       | DPMC-00703-00707  |
| 11.      | 8/7/72        | Memo to refinery managers; re: OSHA Asbestos Standards; from G. Holzman                             | DPMC-02986-02998  |
| 12.      | 9/14/72       | Memo to Wood River refinery manager; re: OSHA Asbestos Standards; from G. Holzman                   | DPMC-01244-01247  |
| 13.      | 10/12/72      | Memo to location managers; re: DOL Asbestos Exposure Standard; from A.J. Martin                     | ABS-058892-058893 |
| 14.      | 10/13/72      | Memo to refinery managers; re: OSHA Asbestos Standards; from B.C. Bell                              | DPMC-01248-01258  |
| 15.      | 10/26/72      | Memo "Instructions for Planning a Sampling Program for Asbestos Dust"                               | ABS-021568-021579 |
| 16.      | 11/13/72      | Memo re Definition of 'Exposed' in OSHA Standards                                                   | DPMC-05018-05021  |
| 17.      | 12/21/72      | Memo to refinery managers; re: Asbestos Sampling; from B.C. Bell                                    | ABS-027406-027408 |

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| 18. | 1/31/73   | Memo re DOL Asbestos Exposure Standard; from A. J. Martin                                                                                                               | DPMC-00637-07560  |
| 19. | 2/2/73    | Memorandum regarding asbestos caution labels                                                                                                                            | ABS-004149-004152 |
| 20. | 2/14/73   | Memo to Head Office - Manufacturing Engineering; re: Asbestos Tests (sampling); from J.M. Braus                                                                         | DPMC-02694-02707  |
| 21. | 12/4/73   | Memo re: California OSH Regulations on Asbestos; from Medical Director and Manager, Industrial Hygiene                                                                  | ABS-058929        |
| 22. | 1/4/74    | Memo (dated 1/4/73 but attachments make it clear that the actual date is 1/4/74) to refinery managers; re: OSHA Asbestos Standard Medical Examinations; from G. Holzman | ABS-008076-00440  |
| 23. | 3/1974    | A Condensation of Environmental Facts on Asbestos and Health Presented at a Series of Customers Seminars by Johns-Manville Corporation                                  | DPMC-00042-00068  |
| 24. | 5/74      | Shell Occupational Health Program                                                                                                                                       |                   |
| 25. | 9/4/74    | Memorandum regarding asbestos fiber counts, Wood River.                                                                                                                 |                   |
| 26. | 10/11/74  | Memorandum for File; re: Asbestos Sampling; from Jerry Ransdell                                                                                                         | ABS-000113-000116 |
| 27. | 10/14/74  | Memorandum for File; re: Asbestos Sampling; from Jerry Ransdell                                                                                                         | ABS-026031-026032 |
| 28. | 10/24/74  | Memorandum for File; re: Asbestos Sampling; from Jerry Ransdell                                                                                                         | ABS-000110-000112 |
| 29. | 1974-1975 | Shell Oil Company Deer Park Manufacturing Complex Contract Construction Safety Regulations                                                                              |                   |
| 30. | 8/27/75   | Memo concerning potential asbestos hazard in servicing motor vehicle brake and clutch assemblies                                                                        | ABS-046771-046785 |
| 31. | 9/19/75   | Deer Park Manufacturing Complex - Chemical Safety Program                                                                                                               | ABS-003459-003463 |
| 32. | 11/3/75   | Memo to manufacturing complex managers; re: OSHA Health Standard on Asbestos; from H.L. Kusnetz                                                                         | DPMC-05116-05118  |

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| 33. | 11/6/75  | Correspondence to Shell Oil from Johns-Manville Corporation; re: Recommended Work Practices - Shop and Field Fabrication of Asbestos Sheet Products         | ABS-056346-056404 |
| 34. | 11/12/75 | Memo to location managers; re: Employee Exposure to Asbestos; from D.P. Atwood                                                                              | DPMC-05108-05115  |
| 35. | 11/18/75 | Memo to refinery managers; re: National Emission Standards for Hazardous Air Pollutants; from Manager - Manufacturing Environmental Conservation Department | DPMC-02922-02944  |
| 36. | 11/18/75 | Memo to refinery managers; re: National Emission Standards for Hazardous Air Pollutants; from R.E. Van Ingen                                                |                   |
| 37. | 12/10/75 | Memo re: Industrial Hygiene Surveillance Proposal; from J.D. Ransdell                                                                                       | ABS-013030-013034 |
| 38. | 1976     | Safety and industrial hygiene forward programs and goals                                                                                                    |                   |
| 39. | 3/30/76  | Memo (Safety S-35) re: asbestos                                                                                                                             | DPMC-00315-00322  |
| 40. | 6/4/76   | Memo to Deer Park Manufacturing Complex; re: Asbestos Monitoring During Demolition of Old AC Facility; from J.D. Ransdell                                   | DPMC-05497-05517  |
| 41. | 7/30/76  | Safety Bulletin on Asbestos                                                                                                                                 | DPMC-01496        |
| 42. | 8/2/76   | Memo re physical examinations for employees assigned to use respirators by Roy Joyner                                                                       | ABS-035091-035092 |
| 43. | 9/7/76   | Memo to area distribution manager; re: Asbestos Survey - Brake and Clutch Servicing Operations; by S.E. Killiany, Jr.                                       | ABS-038187-038193 |
| 44. | 9/16/76  | Memo re: Asbestos Safety Bulletin; from J. D. Ransdell                                                                                                      | DPMC-01214        |
| 45. | 10/15/76 | Memo re: Industrial Hygiene Exposure Monitoring Program Status; from J.D. Ransdell                                                                          | DPMC-05370-05394  |
| 46. | 2/77     | Memorandum regarding downwind asbestos monitoring by Ransdell                                                                                               |                   |
| 47. | 3/77     | Shell Engineering Guides and Specifications                                                                                                                 | MTZ-002180-002186 |

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| 48. | First Quarter 1977 | Safety and Industrial Hygiene Quarterly Newsletter, First Quarter, 1977.                                       | ABS-014912-014915 |
| 49. | 6/1/77             | Shell Contractor Safety Regulations and Procedures Manual                                                      |                   |
| 50. | 1/2/78             | Shell Contractor Safety Regulations and Procedures Manual                                                      |                   |
| 51. | 4/13/78            | Memo to Deer Park Manufacturing Complex; re: Asbestos Identification Program; from D.E. Johnson                | DPMC-10668        |
| 52. | 8/15/78            | Safety Bulletin: Safety and Industrial Hygiene, Deer Park Manufacturing Complex Newsletter - March - July 1978 | DPMC-00889-00895  |
| 53. | 11/17/78           | Safety Bulletin on Asbestos                                                                                    | DPMC-00885        |
| 54. | 6/29/79            | Asbestos Safety Bulletin                                                                                       |                   |
| 55. | 1980               | Asbestos in the Workplace - A Shell Training Program                                                           |                   |
| 56. | 1980-1991          | Computer print out of asbestos Exposure Data 1980-1991                                                         | ABS-051810-051844 |
| 57. | 9/14/1984          | Asbestos vs. Non-Asbestos Gaskets                                                                              | WRR-09460-09470   |
| 58. | 1985               | Asbestos: Effects on Health of Exposure to Asbestos by Doll and Peto                                           |                   |
| 59. | 12/3/86            | Memorandum regarding asbestos monitoring summary by Snyder                                                     | WRR-08459-08466   |
| 60. | 1995               | Asbestos Monitoring Summary (Sampling 1995), printed 10-2000                                                   |                   |
| 61. | Undated            | Memorandum from Atwood to Dunbar regarding asbestos monitoring results.                                        | ABS-001406-001410 |
| 62. | Various Dates      | Industrial hygiene sampling forms - Deer Park                                                                  |                   |

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| 63. | 5/31/72  | Memo, Asbestos Sampling, report of samples.                                                                                                            | ABS-001294        |
| 64. | 7/14/72  | Memo - Safety Requirements for Asbestos.                                                                                                               | ABS-001580-001584 |
| 65. | 8/11/72  | Memo re: Summary - Asbestos Sampling at Houston Refinery Insulation Shop - August 3 and 4, 1973 with records of Asbestos Sampling attached (redacted). | ABS-001348-001362 |
| 64. | 8/17/72  | Memo - Insulation                                                                                                                                      | ABS-001579        |
| 65. | 8/31/72  | Asbestos Sampling protocol with draft record of asbestos sample and cover memo re: sampling at WRMC and DPMC                                           | ABS-000154-000157 |
| 66. | 1/8/74   | Record of Asbestos Sampling, Houston, CA Unit Diaphragm Deposit Area (redacted).                                                                       | ABS-001281        |
| 67. | 10/22/74 | Asbestos Counts; reference BRC 8077                                                                                                                    | ABS-001295        |
| 68. | 9/24/74  | Report, Record of Asbestos Sampling, CA Unit, Diaphragm Deposit Area (redacted).                                                                       | ABS-001280        |
| 69. | 9/27/74  | Report, Record of Asbestos Sampling at Epon I, Kettle Floor (redacted).                                                                                | ABS-001279        |
| 70. | 10/25/74 | Memo re: asbestos sampling at MTZ on 10-8-74                                                                                                           | ABS-000109        |
| 71. | 3/19/75  | Record of Asbestos Sampling, CA Unit , Diaphragm Deposit Area (redacted).                                                                              | ABS-001293        |
| 72. | 3/1/76   | Memo with attachments - Industrial Hygiene Survey - Asbestos vs. Brake and Clutch Servicing Operations.                                                | ABS-002521-002523 |
| 72. | 3/1/76   | Memo re: Asbestos Monitoring during Demolition of Old AC Facility                                                                                      | ABS-000911-000913 |
| 73. | 3/8/76   | Memo re: Asbestos Monitoring during Demolition of Old AC Facility                                                                                      | ABS-000908-000910 |
| 74. | 3/25/76  | Memo re: Asbestos Monitoring during Demolition of Old AC Facility (redacted).                                                                          | ABS-000903-000907 |
| 75. | 7/4/76   | Memo re: Asbestos Monitoring Results at demolition of the DPMC allyl                                                                                   | ABS-000102-000108 |

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| 76. | 2/17/77  | Memo forwarding Asbestos monitoring report at V-800/801 site, Fish Construction Co., and Diagram.                                                                                                                  | ABS-001285-001287 |
| 77. | 4/29/77  | Memo re: Asbestos Monitoring Forms taken on 2-17-77 as the demolition of DPMC V-800.                                                                                                                               | ABS-000092-000101 |
| 78. | 7/15/77  | Table of Asbestos monitoring results taken during asbestos work performed by Payne & Keller workers between 1975 and 1977 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted). | ABS-000450-000451 |
| 79. | 7/15/77  | Memo re: Asbestos Monitoring Results from the DPMC CA from 1972 - 1977 and 1987 (redacted). Cell sampling                                                                                                          | ABS-000088-000091 |
| 80. | 8/31/78  | Letter re: Monitoring Results Forms for removal of asbestos insulation from the DPMC water softener unit no. 3 in July and August, 1978                                                                            | ABS-000081-000087 |
| 81. | 9/5/78   | Asbestos Monitoring Forms for samples taken on Carpenter Construction workers during insulation removal from Water Softener #3 at DPMC in August, 1978 (redacted).                                                 | ABS-000250-000251 |
| 82. | 9/6/78   | Table of Asbestos monitoring results taken during asbestos work performed by Payne & Keller workers between 1975 and 1978 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted). | ABS-000448-000449 |
| 83. | 9/6/78   | Asbestos Monitoring Forms for Cristensen workers taken during insulation removal from Water Softener #3 at DPMC in July, 1978 (redacted).                                                                          | ABS-000254-000256 |
| 84. | 10/24/78 | Letter re: Monitoring Results Form for removal of asbestos insulation from the DPMC sulfur recovery unit in August and September, 1978 (redacted).                                                                 | ABS-000073-000080 |
| 85. | 10/29/79 | Table of Asbestos monitoring results taken in August of 1979 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted).                                                              | ABS-000446-000447 |

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| 86.  | 10/29/79 | Table of Asbestos monitoring results taken on 8-10-79 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted).                    | ABS-000433-000434 |
| 87.  | 11/20/79 | Memo re: Industrial Hygiene Evaluation/Chlor-Alkali Facility (redacted).                                                                                          | ABS-000900-000902 |
| 88.  | 5/9/80   | Letter re: Asbestos Monitoring (redacted).                                                                                                                        | ABS-000725-000726 |
| 89.  | 5/12/80  | Ordering and Storing Drums for Asbestos Waste Disposal                                                                                                            | ABS-001523-001524 |
| 90.  | 6/22/81  | Memo re: table of asbestos monitoring results taken on 12-17-80 during asbestos work performed by Payne & Keller workers at the DPMC CA unit.                     | ABS-000430-000432 |
| 91.  | 12/23/81 | Cover Letter - Enclosed are Industrial Hygiene Sampling Forms from 4-4-79.                                                                                        | ABS-002472-002476 |
| 92.  | 2/26/82  | Letter re: copy of past asbestos monitoring data (attachment missing).                                                                                            | ABS-001488        |
| 93.  | 3/26/82  | Table of Asbestos monitoring results taken in February and March of 1982 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted). | ABS-000442-000443 |
| 94.  | 5/26/82  | Letter re: Personnel and area monitoring results for asbestos taken during dismantlement of the DPMC G-400 Unit (redacted).                                       | ABS-000070-000072 |
| 95.  | 11/14/82 | Memo - Supply picture, Asbestos - free insulation.                                                                                                                | ABS-001582-001584 |
| 96.  | 12/17/82 | Letter re: Area monitoring results for asbestos taken during dismantlement of the DPMC EP furnace.                                                                | ABS-000068-000069 |
| 97.  | 1/13/83  | Table of Asbestos monitoring results taken on 11-9-82 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted).                    | ABS-000438-000441 |
| 98.  | 4/6/83   | Letter re: Monitoring Results Form for removal of asbestos from DPMC.                                                                                             | ABS-000066-000067 |
| 99.  | 6/29/83  | Memo re: Industrial Hygiene Guidelines for the 1983 Cat Cracker Turnaround                                                                                        | ABS-000172-000175 |
| 100. | 9/28/83  | Letter re: Monitoring Results for B&R (redacted).                                                                                                                 | ABS-000720-000724 |

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| 101. | 10/3/83  | Table of Asbestos monitoring results taken on 6-9-83 during asbestos work performed by Payne & Keller workers at the DPMC CA unit (redacted).                               | ABS-000435-000437 |
| 102. | 5/24/85  | Letter re: Personnel Sampling Results for Asbestos exposure during the removal and handling of asbestos by B&R employees (redacted).                                        | ABS-000716-000719 |
| 103. | 7/31/85  | Cover letter with insulation inspection summary.                                                                                                                            | ABS-000028-000030 |
| 104. | 10/24/85 | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R employees working at the EA Plant (redacted).                                                             | ABS-000714-000715 |
| 105. | 6/24/86  | Asbestos Monitoring Results Form, Specialties EPON I.                                                                                                                       | ABS-001296        |
| 106. | 6/28/86  | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R employees working at the BA Plant (redacted).                                                             | ABS-000712-000713 |
| 107. | 7/10/86  | Memo, Asbestos Personnel Monitoring Data for DPMC and NMC, forwarding printout of asbestos personnel monitoring data post 1978 (redacted).                                  | ABS-001272-001274 |
| 108. | 7/28/86  | Memo forwarding printout of Summary of Asbestos Monitoring Data on File for Major Removal (redacted).                                                                       | ABS-001265-001271 |
| 109. | 10/27/86 | Monitoring Results Form taken during the removal of asbestos siding at DPMC with cover letter.                                                                              | ABS-000055-000056 |
| 110. | 10/28/86 | Letter re: Ind Hyg Sampling Results for Asbestos Insulation in the piperack at the BPA Unit while removing transite at the River Water Station (redacted).                  | ABS-000708-000711 |
| 111. | 11/4/86  | Memo re: Industrial Hygiene Sampling Forms taken by Wayne B. Austin during clean-up of asbestos.                                                                            | ABS-000047-000054 |
| 112. | 11/7/86  | Monitoring results Forms for TIPCO employees who removed tar felt insulation at DPMC in September of 1996 (redacted).                                                       | ABS-000240-000241 |
| 113. | 12/3/86  | Memo re: summary of Asbestos Samples collected at Shell industrial sites by exposure range and summary of personnel exposure data for Shell industrial sites for 1978-1986. | ABS-000035-000042 |

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| 114. | 12/4/86  | Letter re: IH sampling results on B&R contractors (redacted).                                                                                           | ABS-000704-000705 |
| 115. | 12/4/86  | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R Insulators, while removing insulation in A Department (redacted).                     | ABS-000706-000707 |
| 116. | 12/19/86 | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R Insulators, while removing insulation in BD II section of OP II (redacted).           | ABS-000702-000703 |
| 117. | 1/9/87   | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R Insulators, while removing asbestos from E-236 at the ECH Unit (redacted).            | ABS-000700-000701 |
| 118. | 1/22/87  | Letter re: Ind Hyg Sampling Results for Asbestos Collected on B&R Insulators, while removing insulation in areas of BA, Lube C and PX units (redacted). | ABS-000696-000699 |
| 119. | 3/25/87  | Monitoring Results Forms for samples taken on Proler workers during insulation work at Power Plant #1 DPMC in February of 1987 (redacted).              | ABS-000244-000246 |
| 120. | 3/26/87  | Area Monitoring Results taken at the CA unit at DMPC in February of 1987.                                                                               | ABS-000242-000243 |
| 121. | 4/7/87   | Industrial Hygiene Monitoring Form for a Cristensen worker who buried bags of asbestos with a bulldozer ast DPMC in February, 1987 (redacted).          | ABS-000252-000253 |
| 122. | 5/4/87   | Memo re: Asbestos Monitoring Results (redacted).                                                                                                        | ABS-000693-000695 |
| 123. | 5/14/87  | Letter re: The Ind. Hyg. Area Sampling results for Asbestos Collected at The West Operations Building (redacted).                                       | ABS-000690-000692 |
| 124. | 6/1/87   | Memo re: Asbestos Monitoring Results (redacted).                                                                                                        | ABS-000687-000689 |
| 125. | 6/12/87  | Memo re: Asbestos Monitoring Results (redacted).                                                                                                        | ABS-000681-000684 |
| 126. | 6/12/87  | Memo re: Asbestos Monitoring Results (redacted).                                                                                                        | ABS-000685-000686 |
| 127. | 6/22/87  | Asbestos monitoring results forms for Lube Logistics at DPMC (redacted)                                                                                 | ABS-000031-000034 |

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| 128. | 6/24/87 | Asbestos Monitoring Results taken on 6-22-87 during removal of insulation at DPMC (redacted).                                                                            | ABS-000213-000214 |
| 129. | 6/29/87 | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000677-000680 |
| 130. | 6/29/87 | Monitoring results Form for the DPMC CCU samples taken in May of 1987                                                                                                    | ABS-000211-000212 |
| 131. | 7/7/87  | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000670-000673 |
| 132. | 7/87    | Report - DPMC Mortality Study; "Mortality Patterns Among a Cohort of Refinery and Chemical Plant workers"                                                                | ABS-001585-001799 |
| 133. | 7/7/87  | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000674-000676 |
| 134. | 7/21/87 | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000664-000667 |
| 135. | 7/21/87 | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000668-000669 |
| 136. | 7/28/87 | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000659-000663 |
| 137. | 8/7/87  | Memo re: Asbestos Monitoring Results CCU V-607 Steam Drum (redacted).                                                                                                    | ABS-000657-000658 |
| 138. | 8/11/87 | Monitoring results Forms for TIPCO employees working at DPMC in May of 1987 (redacted).                                                                                  | ABS-000235-000239 |
| 139. | 8/11/87 | Monitoring results Forms for Harmsen construction employees working on the DPMC Epon I plant in April and May of 1987 (redacted).                                        | ABS-000231-000234 |
| 140. | 8/17/87 | Table of Asbestos Monitoring Results from samples taken on July and August of 1987 during removal of asbestos from pipes at the DPMC by Brown & Root workers (redacted). | ABS-000651-000654 |
| 141. | 8/17/87 | Memo re: Asbestos Monitoring Results (redacted).                                                                                                                         | ABS-000655-000656 |
| 142. | 8/18/87 | Table of Asbestos Monitoring Results from samples taken on August 14 - 17, 1987 during asbestos removal at the DPMC by Brown & Root workers (redacted).                  | ABS-000646-000648 |
| 143. | 8/18/87 | Table of Asbestos Monitoring Results from samples taken on 09-05-88 during removal of asbestos from pipes at the DPMC by Brown & Root workers (redacted).                | ABS-000649-000650 |

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| 144. | 9/1/87   | Table of Asbestos Monitoring Results from samples taken on August 14 - 17, 1987 during asbestos removal at the DPMC CC Gas Unit by Brown & Root workers (redacted).                                 | ABS-000642-000645 |
| 145. | 9/17/87  | Cover re: Asbestos monitoring during routine maintenance in a cooling tower (redacted).                                                                                                             | ABS-000228-000230 |
| 146. | 9/19/87  | Table of Asbestos Monitoring Results from samples taken on August 28 - 29, 1987 during asbestos removal at the DPMC CC Gas Unit by Brown & Root workers (redacted).                                 | ABS-000640-000641 |
| 147. | 9/27/87  | Table of Asbestos Monitoring Results from samples taken on 9-05-88 during asbestos removal at DPMC by Brown & Root workers (redacted).                                                              | ABS-000638-000639 |
| 148. | 11/6/87  | Table of Asbestos Monitoring Results from samples taken on 10-20-87 during asbestos removal at DPMC by Brown & Root workers (redacted).                                                             | ABS-000636-000637 |
| 149. | 11/9/87  | Table of Asbestos Monitoring Results from samples taken on 10-29-87 during asbestos removal at DPMC by Brown & Root workers (redacted).                                                             | ABS-000634-000635 |
| 150. | 12/11/87 | Table of Asbestos Monitoring Results from samples taken on December, 1987 during asbestos removal for the demolition of the DPMC "G" Plant Demolition Project by Brown and Root workers (redacted). | ABS-000632-000633 |
| 151. | 12/23/87 | Table of Asbestos Monitoring Results from samples taken on December 9 and 10, 1987 during asbestos removal for the demolition of the DPMC "G" Plant by Brown and Root workers (redacted).           | ABS-000630-000631 |
| 152. | 1987     | Audit of Asbestos work performed on the DPMC CCU by Brown and Root workers.                                                                                                                         | ABS-000215-000216 |
| 153. | 3/10/88  | Monitoring results Forms of area samples taken at the DPMC CCU in March, 1988                                                                                                                       | ABS-000193-000195 |
| 154. | 6/2/88   | Newsletter - "DPMC Health Study"                                                                                                                                                                    | ABS-001800        |

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| 155. | 8/12/88 | Memo re: Table of Ambient Levels at the DPMC Cat Cracker Unit.                                                                          | ABS-000191-000192 |
| 156. | 7/21/89 | Cover memo re: monitoring Results Forms for area samples taken at the DPMC Cat Cracker Control Room for June, 1989.                     | ABS-000176-000187 |
| 157. |         | Notes on the asbestos work procedures observed and samples were taken at WRMC (redacted).                                               | ABS-000151-000153 |
| 158. |         | Monitoring results Forms and Industrial Hygiene Sampling forms for the DPMC CCU and Lube Unit, June through September, 1987 (redacted). | ABS-000196-000210 |
| 159. |         | Monitoring Results From, August through October 1986, asbestos removal and automotive work (redacted).                                  | ABS-001282-001284 |
| 160. |         | DPMC-Maintenance, Respirator Use Requirements (redacted).                                                                               | ABS-001288-001289 |
| 161. |         | Monitoring Results Forms, 10-26-86 thru 12-17-86 (redacted).                                                                            | ABS-001290-001292 |
| 162. |         | Monitoring Results Forms for Sulfur Recovery Unit/EP. 8/29/78 thru 10/2/78 (redacted).                                                  | ABS-001489-001491 |
| 163. |         | Records of Asbestos Sampling, 11-20-72 thru 12-6-72                                                                                     | ABS-001321-001333 |
| 164. |         | Monitoring Results Forms (redacted).                                                                                                    | ABS-001496-001498 |
| 165. | 7/19/72 | Asbestos Handling Program                                                                                                               | ABS-030858        |