

AFFIDAVIT OF MATTHEW CARROLL

STATE OF CALIFORNIA,

COUNTY OF Santa Cruz§
§
§

BEFORE ME, the undersigned authority, on this day personally appeared, MATTHEW CARROLL, known to me or through his driver's license, and who, upon his oath, deposed and states as follows:

My name is MATTHEW CARROLL. I am over the age of eighteen (18) years, have never been convicted of a felony; and am fully competent to make this affidavit. The facts stated within this affidavit are within my personal knowledge and are true and correct.

Attached to this affidavit as Exhibit "A" are fiber release studies during gasket removal produced under my direction and control while I was an Industrial Hygienist working for Shell Oil Company at its Wood River, IL refinery. These documents were made at or near the time of the tests reflected on them by a person with knowledge of such tests. The documents attached as Exhibit "A" were made and kept in the ordinary course of Shell's business at the Wood River refinery by the Industrial Hygiene Department and it was the regular practice of the Industrial Hygiene Department to make and keep such tests. Each of these documents are genuine and authentic copies of originals made and kept by Shell in the ordinary course of their business.

And further the affiant sayeth not.

Matthew Carroll
MATTHEW CARROLL

Subscribed and sworn to before me, a notary public, in and for the State of California on this the 5th day of March, 2002 to certify which witness my hand and official seal.

[Notary]



Kathleen M. Olsen
NOTARY PUBLIC

My Commission expires: July 20, 2003

ALL-STATE LEGAL

PLAINTIFF'S
EXHIBITGSPK-48

(REV. 12-81)
INDUSTRIAL HYGIENE
SAMPLING FORM

SENT TO H.O.

IHL NO.

IHL 033220

NAME EMPLOYEE SAMPLED David L. Hatfield		SAMPLE TYPE 1 ☐ PERSONAL-TWA 2 ☐ PERSONAL-PEAK 3 ☐ AREA 4 ☐ BLANK 5 ☐ BULK 6 ☐ LAB CONTROL 7 ☐ SOURCE 8 ☐		COLLECTOR 1 ☐ CHARCOAL TUBE 2 ☐ FILTER (RESP.) 3 ☐ FILTER (TOTAL) 4 ☐ IMPINGER 5 ☐ PASSIVE DOSIMETER 6 ☐ SILICA GEL 7 ☐ PACKED TUBE 8 ☐		ANALYSIS REQUIRED CODE NAME RESULT		UNIT 1 ☐ PMV 5 ☐ MG 2 ☐ MG/M ³ 6 ☐ FIBER 3 ☐ PPBV 7 ☐ % WT 4 ☐ FIBER/CC 8 ☐ % VOL 9 ☐	
SOCIAL SECURITY NUMBER 319-34-4790						200509 Andrew		29.4	
EMPLOYEE NUMBER 068478									
JOB EXPOSURE PROFILE EW0072753									
JOB TITLE Pipfitter/Welder-Utilities									
EMPLOYEE'S COMPANY Shell Oil		POSSIBLE INTERFERENCES/INSTRUCTIONS						DATE SAMPLED 02/20/85	
LOCATION (SHELL FACILITY OR OTHER) E004								SHIFT ☐ ☒	
AREA/UNIT Baker House 910244		BAROMETER		TEMPERATURE		SAMPLE NO. WRMC022085-3		SAMPLED BY MR Carroll PHONE 236-2949	
OPERATING CONDITION/OPERATION 35		WIND		HUMIDITY		DESCRIPTION OF COLLECTOR BKG. LOT NO., ETC. 0.84 MGE 0454		RETURN RESULTS TO WRMC	
		M.P.H.		% R.H.					

TIME	WORK TASK	PPE	TIME AT TASK	INSTR. READING	SKETCH AREA (And Or Remarks)
START TIME 1301	Pump on				PLAINTIFF'S DEPOSITION EXHIBIT Canniffham KR 5-31-P.9
	Disassemble gasket removed from 6" valve. Valve was previously in water service.				
	Work place in makeshift shop under north side of 14 boiler. - big open all around blacking out.				
1325	Pump off				
	simulate worst case situation				
	Gasket around off all hand gasifier - considerable dust / debris / gasket material down off of gasifier				

*Personal Protective Equipment: Check Column for Each Task Where Worn

TYPE: GIVE EQUIPMENT USED, MFR., MODEL NO., ETC. **MSA 1/2 mask TYPE H cartridges; Corvalls, gloves**

INSTRUMENT TYPE & MODEL NO. MSA 1		SERIAL NO. 010921		INFORMATION FOR TWA DETERMINATION		COMMENTS	
CALIBRATED BY MR Carroll		DATE 2/20/85		LENGTH OF SHIFT 480 MIN. DOES THIS SAMPLE REPRESENT EXPOSURE OVER THE ENTIRE SHIFT? YES ☐ NO ☒ IF NO: INCLUDE RESULTS FROM _____ ADDITIONAL SAMPLES (ATTACHED) ASSIGN ZERO EXPOSURE FOR _____ MINUTES OF SHIFT DURING PERIOD NOT SAMPLED. TWA CANNOT BE CALCULATED FROM THESE SAMPLES.			
REFERENCE/METHOD Swab bubble							
VOLUME PER COUNT		COUNTER READING				DATA CLASSIFICATION ☐ ☒	
FLOW RATE 2.1 lpm		FINAL		WAS A RESPIRATOR WORN DURING SAMPLE TO CONTROL EXPOSURE? YES ☒ NO ☐		CLASSIFIED BY MR Carroll DATE 3/14/85	
SAMPLING TIME 24 MIN.		50.4 L.		DID ANY SIGNIFICANT SKIN CONTACT OCCUR? YES ☐ NO ☒		REVIEWED BY MR Carroll DATE 3/14/85	

SAMPLED BY (LAST NAME & INITIALS)

ACCOUNTING CODE

IHL NO:

IHL 033220

CONDITION OF SAMPLE UPON RECEIPT

☒ OK ☐ Other (Describe)DATE
RECEIVED

WEEK

DAY

0192

BOX NO.
OR SAMPLE
LOCATION

ANALYZED BY

E. Thomas Skonish

DATE

3-12-85

LAB RECORD NO.

LR16924-pg. #100

GROUP

METHOD NUMBER AND/OR DESCRIPTION

NIOSH P&CAM 239

METHOD CODE

ASBom

NUMBER OF
ANALYSIS

1

REFERENCE

DATE REPORTED
(WEEK - DAY)

11-2

BENCH HOURS
(XXX.X)

ANALYTICAL RESULTS

UNITS: ☐ PPMV ☐ mg/m³ ☒ f/cc

EXPOSURE CALCULATION

TWA, PEAK

WRAC 033220 = 4.86 f/cc

= 28.4 f/cc

SUPERVISING CHEMIST

[Signature]

[Signature]

ND = NONE DETECTED
(REPORT LIMIT OF DETECTION)

CALCULATED BY

INDUSTRIAL HYGIENE
AMPLING FORM

SENT TO HQ

IHL NO.

IHL 033219

NAME EMPLOYER SAMPLED	SAMPLE TYPE	COLLECTOR	ANALYSIS REQUIRED	CODE	NAME	RESULT
SOCIAL SECURITY NUMBER	1 PERSONAL-TWA	1 CHARCOAL TUBE		910509	airlines	16.10
EMPLOYEE NUMBER	2 PERSONAL-PEAK	2 FILTER (RESP.)				
JOB EXPOSURE PROFILE	3 EX AREA	3 FILTER (TOTAL)				
JOB TITLE	4 BLANK	4 IMPINGER				
EMPLOYEE'S COMPANY	5 BULK	5 PASSIVE DOSIMETER				
LOCATION SHELL FACILITY OR OTHER	6 LAB CONTROL	6 SILICA GEL				
AREA UNIT	7 SOURCE	7 PACKED TUBE				
OPERATING CONDITION OPERATION	8	8				
TIME	POSSIBLE INTERFERENCES/INSTRUCTIONS					
START TIME	BAROMETER					
	TEMPERATURE					
	SAMPLE NO.					
	Wenc022085-4					
	DESCRIPTION OF COLLECTOR BOWL LOT NO. ETC					
	024 mae 0454					
	SAMPLER BY					
	me Carroll					
	RETURN RESULTS TO					
	me Carroll					

TIME	WORK TASK	TIME AT TASK	INSTR. READING	SKETCH AREA (And Or Remarks)
1301	pump on			PLAINTIFF'S DEPOSITION EXHIBIT Carmichael K.R. 5-31-99
	area sample collected while pump/ filter			
	guided off with durable quality			
	see Wenc022085-3 for details			
	sample was taken in 4' from work area			
	represents possible exposure to			
	helpless in the area			
1326	pump off			

*Personal Protective Equipment: Check Column for Each Task Where Worn
TYPE: GIVE EQUIPMENT USED, MFR., MODEL NO., ETC.

INSTRUMENT TYPE & MODEL NO.	SERIAL NO.	INFORMATION FOR TWA DETERMINATION	COMMENTS
MSA 1	010961	LENGTH OF SHIFT MIN.	
CALIBRATED BY	DATE	DOES THIS SAMPLE REPRESENT EXPOSURE OVER THE ENTIRE SHIFT? YES NO	
me Carroll	2/20/85	If No	
REFERENCE/METHOD		INCLUDE RESULTS FROM ADDITIONAL SAMPLES (ATTACHED)	
VOLUME PER COUNT	COUNTER READING	ASIGN ZERO EXPOSURE FOR MINUTES OF SHIFT DURING PERIOD NOT SAMPLED.	
FLOW RATE	FINAL	TWA CANNOT BE CALCULATED FROM THESE SAMPLES.	
2.0 epm	INITIAL	WAS A RESPIRATOR WORN DURING SAMPLE TO CONTROL EXPOSURE? YES NO	
SAMPLING TIME	NET	DID ANY SIGNIFICANT SKIN CONTACT OCCUR? YES NO	
25 MIN. 50 L			

DATA CLASSIFICATION ☐ ☒ 1
CLASSIFIED BY
me Carroll 3/19/85
REVIEWED BY

SAMPLED BY (LAST NAME & INITIALS)

ACCOUNTING CODE

181271151

IHC NO: 033219 DATE: 11-1-85 TIME: 11:15 AM

CONDITION OF SAMPLE UPON RECEIPT

☒ OK
 ☐ Other (Describe)

DATE RECEIVED 11-1-85	WEEK DAY 01
BOX NO. 11 OR SAMPLE LOCATION	11-1

ANALYZED BY

DATE

LAB RECORD NO.

GROUP

METHOD NUMBER AND/OR DESCRIPTION

METHOD CODE

NUMBER OF ANALYSIS

REFERENCE

DATE REPORTED (WEEK - DAY)

BENCH HOURS (XXX.X)

ANALYTICAL RESULTS

 UNITS: ☐ PPMV ☐ mg/m³ ☒ f/cc

EXPOSURE CALCULATION

TWA, PEAK

WRMC 033219 = 2.73 f/cc

= 16.10 f/cc

SUPERVISING CHEMIST

 NO = NONE DETECTED
 (REPORT LIMIT OF DETECTION)

CALCULATED BY

0332

PLAINTIFF'S DEPOSITION
EXHIBIT
SUNNINGHAM 5
K.A. 5-31-89

SAMPLED BY (LAST NAME & INITIALS)					ACCOUNTING CODE 81271151					ANALYST NO. 1234 ANALYST NAME ANALYST ADDRESS ANALYST PHONE NO. DATE RECEIVED WEEK DAY BOX NO. 1234 OR SAMPLE LOCATION	
CONDITION OF SAMPLE UPON RECEIPT ☒ OK ☐ Other (Describe)											
ANALYZED BY <i>E. Veronica Giovanni</i>					DATE 3-12-85		LAB RECORD NO. LR16924-Pg. # 100		GROUP		
METHOD NUMBER AND/OR DESCRIPTION H105A PSCAM 239										METHOD CODE ASBOM	
REFERENCE										NUMBER OF ANALYSIS 1	
										DATE REPORTED (WEEK - DAY) 11-2	
										BENCH HOURS (XXX.X)	
ANALYTICAL RESULTS										EXPOSURE CALCULATION	
UNITS: ☐ PPMV ☐ mg/m ³ <i>ff/cc</i>										TWA, PEAK	
WRMC 12-2085-6 = 0.07 f/field = 0.52 f/cc											
SUPERVISING CHEMIST <i>DM</i>					NO = NONE DETECTED (REPORT LIMIT OF DETECTION)					CALCULATED BY	