

disease or condition in humans. There is scientific evidence that demonstrates that Calidria asbestos does not cause mesothelioma or any other diseases caused by other types of asbestos.

Despite the unique nature of the Calidria fiber, which did not pose the health risks that might be created by asbestos from other deposits, Union Carbide assumed that Calidria was as potentially hazardous, if safe practices were not observed, as other chrysotile asbestos and advised its employees to treat its Calidria asbestos as such.

Union Carbide communicated to its Calidria employees the known potential risks associated with asbestos exposure at least as early as 1963 when Union Carbide began operation of the manufacturing plant located near King City. The communications occurred in a number of ways, including during regular safety meetings, training sessions, including sessions devoted to the use of respirators (which use was required within certain areas of the King City Mill starting in 1963), through posters displayed at the plant and through individual consultations. Since 1963, asbestos health and safety information was also communicated to employees as part of the medical surveillance program, and air monitoring was conducted to ensure that dust control measures were effective. Technical sales representatives were also familiar with asbestos health and safety issues because of their familiarity with the various ways that Union Carbide communicated asbestos health information to customers.

In addition, Union Carbide provided its "Calidria" employees and its customers, and potential customers with a copy of the Asbestos Toxicology Report prepared by Union Carbide in 1964. As referenced in that Report, the potential association between long-term exposure to some types of asbestos and certain diseases had been known for many years. In succeeding years, employees, customers, and potential customers were provided with additional health and safety information as it became available.

See also Union Carbide's Response to Interrogatory No. 63.

INTERROGATORY NO. 85: If your answer to Interrogatory No. 84 is "Yes," identify each such occasion on which Defendant so educated or informed its employees, distributors or purchasers, as follows:

- (a) Identify the persons or parties which you educated or informed;
- (b) State when, where and in what manner they were educated or informed;
- (c) Identify any and all documents referring to, relating to or reflecting the communication or other dissemination of such information; and
- (d) Identify any and all persons who so educated or informed said employees, distributors, purchasers or persons working in the vicinity of application or who participated in the same in any way, including, but not limited to, assembling, drafting, writing, rewriting, preparing or conveying such information in any format.