

of whom were sophisticated companies familiar with the use and handling of asbestos. Union Carbide referred to the early ACGIH Threshold Limit Value in the Toxicology Report. This Asbestos Toxicology Report was updated with the 1969 Asbestos Toxicology Report and the Mid-1970 and 1972 Toxicology summaries. The initial report and its updates were prepared to keep customers current with evolving medical knowledge about health and safety issues relating to asbestos. Union Carbide also disseminated the Threshold Limit Value established by the OSHA Standard to Calidria customers in material safety data sheets and other health and safety literature, and provided customers with copies of the OSHA regulations themselves.

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

To the extent that additional information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 76: State whether such threshold limit values or maximum allowable concentrations referred to in Interrogatory No. 75 involved TOTAL dust or just asbestos dust?

RESPONSE:

See Union Carbide's Response to Interrogatory No. 75, including all objections set forth therein. Union Carbide also objects to this Interrogatory on the grounds that it is overly broad in terms of time and that the legal definition is in the public domain and equally accessible to plaintiff. Moreover, to the extent this Interrogatory seeks a scientific definition, it improperly seeks without foundation to require an expert opinion.

INTERROGATORY NO. 77: Describe, in detail, any and all tests, if any, conducted by Defendant, any predecessor or any related company, or anyone acting on behalf thereof, concerning the quantity, quality or threshold limit values of asbestos dust or particles to which applicators or consumers of asbestos-containing products were exposed while using any product identified in response to Interrogatory Nos. 19 and 42, including:

- (a) The product being used;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said test;
- (c) State the date(s) of said test;
- (d) Describe the methodology, results and conclusions of said test;
- (e) Identify any and all documents referring to, relating or reflecting said test or the results and conclusions thereof; and,