by brand/trade name any and all such products which contained vermiculite and for each:

(a) State the date(s) during which said product contained vermiculite;
(b) State, in percentage terms, the amount of vermiculite contained in the product;
(c) Identify the source of the vermiculite used in the product;
(d) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
(e) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
(f) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
(g) State whether any sample, part or piece of such product is still in existence; and
(h) Identify all documents relating to such product, including but not limited to any package, brochure, catalog, picture, photograph or like representation of the product or packaging.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 41, including all objections set forth herein.

INTERROGATORY NO. 43: With respect to the products listed in response to Interrogatory Nos. 19 and 42, did Defendant, any predecessor or related company or the manufacturer of the products ever conduct tests of any kind on any or all of said products concerning possible or potential health hazards involved in its use or in the use of materials contained therein?

RESPONSE

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad. Subject to its objections, Union Carbide responds as follows:

Calidria is a unique short-fiber chrysotile asbestos that is uncontaminated by tremolite asbestos. Calidria is now known not to pose the health risks of certain other forms of asbestos. However, during the period when scientific knowledge was developing, Union Carbide undertook several studies to ensure the safety of workers and customers exposed to its Calidria asbestos.

Starting in 1963, Union Carbide has had a medical monitoring program, consisting of tests including chest x-rays and pulmonary function analysis for employees working at its milling operation at King City, California. The results of these tests show that no employee at the King City mill experienced any asbestos-related health effect since the King City operation