

FILE NAME: Square D (SQD)

DATE: 2014

DOC#: SQD019

DOCUMENT DESCRIPTION: Legal – Deposition of Redfield for Square D – App#14

SQUARE D COMPANY
Cedar Rapids Plant

TO: MC FROM: ME-11 DATE: September 11, 1979
ATTENTION: Chuck Misfeldt BY: Bill Vosdingh cc: C.W. Denny III - DM
SUBJECT: Asbestos Free W.H. Woito - ME
Molding Material C.R. Mortimore - PA
C.R. Junntila - ME-1
E.J. Fritz - EF
I.K. Dunn - QA
M.S. Douglas - QC
K.L. Kaliban - MC-3
C.A. Ashley - PS
R.W. Niccols - RD-3
R.D. Boley - MO
B.F. Wesseldine - MO
L.C. Kovar - MO

In order for us to eliminate the use of molding material containing asbestos, I am requesting that no more orders be placed for Plenco 509-140 Corp. No. 1593-000222.

General Electric's P4304E Corp. No. 1593-200661 has proven to be a superior material. We have now used over 250,000 pounds with no problems. I have checked with GE and they are capable of supplying all our needs.

To date neither Plenco or Durez have been able to supply a material that can be injection molded and pass our tests.

I am confident that at least Plenco will come up with an acceptable material. When we do get another approved material, I will want to resume utilizing two vendors as we have this year.

Bill
Bill Vosdingh

sf



United States
Environmental Protection
Agency

When completed send this form to:

U.S. Environmental Protection Agency
P.O. Box 2070
Rockville, MD 20852

REPORTING COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS

Please read the accompanying instruction booklet before completing this form. Note that a separate form must be submitted for each plant site, except that total imports of bulk asbestos may be reported in a consolidated corporate report. The instructions provide further directions.

When this form is complete, enclose it in the preaddressed envelope provided. Should you have any questions, please contact the Industry Assistance Office toll-free at (800) 424-8065 or in Washington, D.C. at (202) 854-1404.

All persons who are solely secondary processors, importers of asbestos mixtures, or importers of articles containing asbestos components will report in the first phase on EPA Form 7710-37, titled "Secondary Processing and Importation of Asbestos Mixtures." These persons will report in this form, EPA Form 7710-36, only upon receipt of notice to that effect from EPA (see 40 CFR 163, part D).

A(1). RESPONDENT IDENTIFICATION

1. Company name Square D Company		Plant site name Square D Company	
Address (Number and street) 4800 Paris Road			
City Columbia	County Boone	State Missouri	ZIP code 65205
2. Principal technical contact person Name Richard Widdowson	Job title Process Engineer	Office telephone (Area code, number, extension) 314/474-8421	
3. If applicable - Record mine identification number N/A			
4. If applicable - Record the name and address of the parent corporation which is responsible for the fiscal management of the reporting site. Name of parent corporation N/A Address (Number and street) City County State ZIP code 5. Record the total number of years during which the manufacture and/or processing of asbestos has been conducted at the reporting site. 4.5			

A(2). RESPONDENT ACTIVITY

6. Identify your activity from the definitions in the instruction booklet and mark (X) the box next to the category below that best describes your activity(ies). Mark (X) next to an activity that you are reporting on this form. You must at least complete the portions of this report that are indicated next to the box you mark, and you must complete other sections if you conduct that activity. For example, if at the same plant site you process bulk asbestos to produce an asbestos mixture and you also process an asbestos mixture that is made at another location, then you as a primary processor must also complete part D as a secondary processor. All persons who are miners, millers, primary processors, or importers of bulk asbestos must report their asbestos activities at all plant sites. Mark (X) your activity(ies) that is reported on this form.

- ☐ Mine and mill - Complete parts A, B(1), G, H, I, J, K (B(3), if applicable)
- ☐ Primary processor - Complete parts A, C, G, H, I, J, K (B(3), if applicable)
- ☐ Importer of bulk asbestos - Complete parts A, B(2) (B(3), if applicable)
- ☒ Secondary processor - Complete parts A, D, G, H, I, J, K
- ☐ Importer of asbestos mixtures - Complete parts A and E
- ☐ Importer of article(s) containing asbestos component(s) - Complete parts A and F

A(3). CERTIFICATION FOR CLAIMS OF CONFIDENTIALITY

You may claim as confidential any information you submit on this form. The instructions provide specific instructions on how to assert claims of confidentiality. For information which you submit in attachments to the form, provide a copy which clearly indicates the information you wish to claim confidential. Space is provided at the end of each line to claim information on that line confidential.

For any information on this form you claim as confidential, you must certify that the information is confidential. The signature below will attest to the truth and accuracy of the following statements. All four statements must be true about any information you claim confidential.

1. My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures.
2. The information is not, and has not been, reasonably obtainable by other persons (other than governmental bodies) by using legitimate means (other than discovery based on a showing of special need and in a judicial or quasi-judicial proceeding) without my company's consent.
3. The information is not publicly available.
4. Disclosure of the information claimed as confidential would cause substantial harm to my company's competitive position.

7. Signature of authorized official: *[Signature]* Date: April 27, 1983

B(1). PRODUCTION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS MINED OR MILLED

Enter, in short tons, the amount of bulk asbestos you produced (mined or milled) for 1979 through 1981.

Year	Report in short tons						Confidential Mark (X)
	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980	N/A						
1981							

B(2). IMPORTATION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS IMPORTED

Enter, in short tons, the amount of bulk asbestos you imported for 1979 through 1981.

Mark (X) one: ☐ This is a corporate consolidated report. ☐ This is a plant site report.

Year	Report in short tons						Confidential Mark (X)
	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980	N/A						
1981							

B(3). EXPORTATION OF BULK ASBESTOS

QUANTITY OF BULK ASBESTOS EXPORTED

Enter, in short tons, the amount of bulk asbestos you exported for 1979 through 1981.

Mark (X) one: ☐ This is a corporate consolidated report. ☐ This is a plant site report.

Year	Report in short tons						Confidential Mark (X)
	Chrysotile	Crocidolite	Amosite	Anthophyllite asbestos	Tremolite asbestos	Actinolite asbestos	
1979							
1980	N/A						
1981							

EPA Form 7710-36 (6-12-83)

EXHIBIT

14

7-2-14

SQDKVR_008586

D CORPORATE
MAY 05 1983
RISK MANAGEMENT

C CORPORATE
MAY 05 1983
RISK MANAGEMENT

U.S. ENVIRONMENTAL PROTECTION AGENCY				COMPANY NAME AND ADDRESS (Same as reported in Item 1 on page 1)					
REPORT OF COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS Continued				Square D Company 4800 Pacific Road Columbia, Missouri 65205					
F. IMPORTATION OF ARTICLE(S) CONTAINING ASBESTOS COMPONENTS Enter the following information for each article that you imported in 1981. Classify your imports according to the lists in section C or D.									
Article name (Enter one article per line) (1)		Total annual imports (2)				Asbestos component(s) (Use one line per component) (3)	Confidential Mark (4)		
Code number	Generic name	Year	Quantity	Unit of measure	Value (U.S. dollars)				
	N/A	1978							
		1980							
		1981							
		1979							
		1980							
		1981							
		1978							
		1980							
		1981							
G. EMPLOYEES Record the number of employees at the reporting site in each of the categories below. Count each employee in one category only.									
						Number of employees	Confidential Mark (5)		
(1) TOTAL number of employees at plant site (Sum of 2, 3, 4, and 5)						337			
(2) Number of production employees						194			
(3) Number of employees in shipping, receiving, and moving						8			
(4) Number of maintenance employees						9			
(5) Number of other employees						113			
H. SUMMARY OF CURRENT WORKER EXPOSURES This section requires you to report, by category of production workers, the arithmetic mean of the 8-hour time weighted average (TWA) and ceiling concentration exposure levels for all employees at the reporting site. Report for all employees for whom you have determined a TWA and according to each production line making the reported products. The instructions include a worksheet for making necessary calculations (see Appendix B).									
End product (Enter number) (1)		Production work category (2)	Number of employees (3)	8 hr. time weighted average				Ceiling concentration level (Range) (5)	Confidential Mark (6)
Code number	Generic name			Arithmetic mean of detectable measurements (4a)	Standard deviation (4b)	Total number of measurements (4c)	Number of detectable measurements (4d)		
	Not applicable	Miners and millers							
		MHI operations (includes all employees working in production areas of mill)							
142	Welded Case Circuit Breakers	Primary production							
		Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Other production employees	5-7	-	-	-	3	-	X
		Primary production							
		Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Other production employees							
		Primary production							
		Wet mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Dry mechanical operations (includes machining, saw- ing, drilling, cutting, grinding, pulverizing, weaving, etc.)							
		Other production employees							
(10) Sampling and analysis methods									
☒ Mark this box if you use the NIOSH method to sample airborne concentrations of asbestos fibers in the workplace and analyze measurements (NIOSH (NIOSH) Pub. No. 78-127). If you utilize other sampling and analysis methods, enter the appropriate codes for those methods listed in the instruction booklet under part I.									
(11) Enter the lowest detectable level of the measurements that your company expects to attain by the sampling and analysis methods. (Measurements below this level should be considered as "nondetectable" for the purposes of this rule.)								.01 Fibers/mL	
I. MEASURING ASBESTOS EMISSIONS OR FIBER RELEASE									
NIOSH Permit number _____ N/A									
☐ Yes, enclosed is a separate report for this section concerning measuring asbestos emissions. ☐ No separate report									

EPA Form 7710-30 (5-12-82)

SQDKVR_008587



REPORTING SECONDARY PROCESSING AND IMPORTATION OF ASBESTOS MIXTURES

Form Approved
OMB No. 2000-0478
Approval expires 6-30-88

When completed, send this form to:
US Environmental Protection Agency
PO Box 2070
Rockville, MD 20852

PART I - COMPANY INFORMATION

COMPANY NAME Square D Company		FOR EPA USE ONLY	
ADDRESS (Street, City, State & ZIP Code) 4800 Paris Rd. Columbia, MO. 65202		TECHNICAL CONTACT Richard Widdowson	TELEPHONE NO. 314-474-8421
		IMPORTER ☐ PRINCIPAL ☐ AGENT	

PART II - SECONDARY PROCESSOR END PRODUCT(S)

From the list in Section I, enter the asbestos and product produced. Opposite each product, list the asbestos mixture that you process, and the quantity of each mixture that you consumed in 1981.

END PRODUCT(S)		ASBESTOS MIXTURE(S)		QUANTITY OF ASBESTOS MIXTURE CONSUMED	
CODE	GENERIC NAME	CODE	GENERIC NAME	QUANTITY	UNIT OF MEASURE
142	Circuit Breaker	31	Phenolic Molding Com-	217,866	LB.
			pound		

PART III - IMPORTERS OF ASBESTOS MIXTURE(S) OR ARTICLE(S) CONTAINING ASBESTOS COMPONENTS

List the asbestos mixture(s) or article(s) that you import and the quantity of each item that you imported in 1981. Opposite each item, enter a description of the asbestos component in the mixture or article.

ASBESTOS MIXTURE(S) OR ARTICLE(S)		QUANTITY OF ASBESTOS MIXTURE(S) OR ARTICLE(S) IMPORTED		DESCRIPTION OF ASBESTOS COMPONENT(S) IN ARTICLE
CODE	GENERIC NAME	QUANTITY	UNIT OF MEASURE	

CERTIFICATION FOR CLAIMS OF CONFIDENTIAL BUSINESS INFORMATION

An authorized company official may claim any information reported on this form as confidential business information. To do this, the confidential information must be clearly circled with a red marker. In addition, an authorized company official must sign below to certify the truth and accuracy of the following four statements, which apply to all information that is claimed.

1. My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures.
2. The information is not, and has not been, reasonably obtainable by other persons (other than governmental bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent.
3. The information is not publicly available elsewhere.
4. Disclosure of the information claimed as confidential would cause substantial harm to my company's competitive position.

SIGNATURE OF AUTHORIZED OFFICIAL

DATE

SQDKVR_008600