

To: G. L. Swallow

Date: November 14, 1974

RLB

R. N. VanBendegom

Copies: N. B. Scheffel
file

Subject: TALC USAGE - PARK FALLS, WISCONSIN

On November 7, 1974 tests were taken at the Flambeau Paper Company of Park Falls, Wisconsin applying an open face filter membrane to determine talc-fiber concentrations as per your October 31, 1974 letter.

A total of 17 air samples were obtained at the following locations:

- | | |
|---|---------------------|
| 1. Blender No.1 - Gen. Area Sample | (Samples #3,10) |
| 2. Blender No.1 - Operator Sample | (Samples #4,5) |
| 3. Blender No.2 - Gen. Area Sample | (Samples #2,12,15) |
| 4. Blender No.2 - Operator Sample | (Samples #13,16,17) |
| 5. Between No.1&2 Blenders - Gen. Area Sample | (Sample #9) |
| 6. Unloading Railroad Car - Worker Sample | (Samples #7,8) |
| 7. Unloading Railroad Car - Gen Area Sample | (Samples #1,6) |
| 8. Slurry Mix Platform - Operator Sample | (Sample #11) |
| 9. Slurry Mix Platform - Gen. Area Sample | (Sample #14) |

Samples number 2, 3, 16 of No. 2 blender were obtained during the use of a competitors talc¹ while all remaining samples were obtained during the use of Johns-Manville talc².

The blenders (both No. 1 & 2) were completely enclosed except for an opening approximately 16 inches square for adding talc and clay. Every 45 minutes the talc and clay (150 lbs each) is manually added with the empty bags asided to the operator's right. The largest portion of dust is emitted when asiding the empty bags after the dumping process. The empty bags are piled on a ~~mat~~ and are not enclosed in either a container or large paper bag. Talc in proportion to clay emits less dust to the surrounding air when added to the blenders. Both blenders were in operation during the plant visit and the adjacent beaters were not in operation. No other processes involved the use of talc in the immediate plant area during the sampling period.

The talc unloading from a railroad car was conducted exterior to the plant with a moderate breeze moving through the car. General Area samples obtained were downwind of the workers at all times.

PLAINTIFF'S
EXHIBIT
CAM-267

Pg #2

G. L. Swallow

11/14/74.

The talc bags were palletized (one pallet high) during the unloading process with a major portion of the bags shifted plus broke open. The shifting plus damaged required workers to manually stack the bags plus unload several pallet loads off the car.

The worker at the slurry platform was new to the operation and reportedly worked at a greater rate than the usually machine tender. A total of 60 bags ($1\frac{1}{2}$ pallets) were dumped in to the slurry during the obtained samples. The operation was constant with only a two minute lapse when a new pallet was brought into position on the platform. The empty bags were asided to the operator's right where a pile was formed on a pallet; the asiding process emits a moderate to heavy concentration of dust to the surrounding air both on the platform and below. A total of 300 bags of talc are used at the slurry process per 24 hours (2 - 8 hour shifts). Upon completion of the talc dumping - the machine is started with the starting process emitting a moderate to heavy dust concentration. The slurry is completely enclosed except for the two foot square top opening for adding talc; the opening is equipped with a lid which is closed after the start-up process.

- (1) United Sierra
Compacted Mistron Vapor
50 lb Bags
- (2) Cyclo-Sorb
Cyclonized Products
Desert Minerals Inc.
Los Angeles, California
50 lb Bags
Lot #1400

AFFIDAVIT

I, Margaret J. Baumgardner, being of full age and first duly sworn do hereby state:

1. I am not a party to this action. I have personal knowledge of the facts set forth in this affidavit, and if called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I am the Research Coordinator for the Claims Resolution Management Corporation ("CRMC"), a wholly owned subsidiary of the Manville Personal Injury Settlement Trust ("Trust"). The CRMC was created in December 1998 and is staffed by former Trust employees. On January 1, 1999, CRMC began providing claims resolution facility services to the Trust.

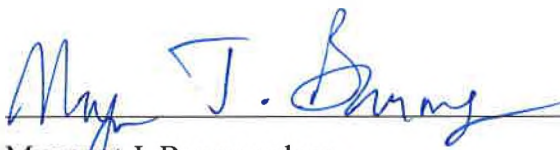
3. In this position, I manage the Asbestos Claims Research Facility ("Facility"), a document and records repository located at 3390 Peoria Street, Suite 304, Aurora, Colorado. The Facility contains the business records including but not limited to correspondence, memoranda, reports, records and data compilations ("record") of Manville Corporation or related entities ("Manville"), generally, as well as Manville records relevant to litigation of asbestos liability. The records found at the Facility were transferred from Manville to the Trust beginning in November 28, 1988, the date on which the Manville bankruptcy plan was consummated. Additional records have been and continue to be transferred directly to the Facility. The Facility's records have been in the custody and control of counsel for the Trust or Trust personnel since the date of consummation.

4. My experience and familiarity with the documents at the Facility began in 1983 while working for Manville. In my work as a paralegal for Manville, I assisted in locating, indexing and packing many of the records which became the foundation documents for the Facility. I continued to work for Manville until September 1987. From March 1988 to September 1988, I was hired to supervise and assist in the indexing of the first 20,000 boxes which were turned over to the Trust in November 1988. From September 1988 to January 1989, I assisted in the privilege review of documents to be given to the Trust. From November 1988 to April 1994, I worked for Freeborn & Peters and was put in charge of the Facility, managing all productions and "new" acquisitions. In September 1995, I was hired by the Trust to manage the Facility. In December 1998, I was hired by

the CRMC to manage the Facility for the Trust. Accordingly, I am personally familiar with many of the records stored at the Facility, as well as how the records have been gathered.

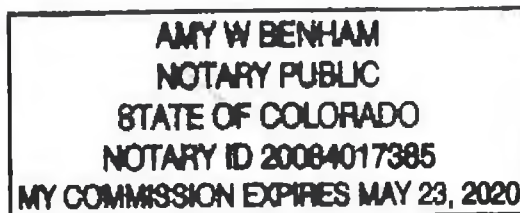
5. To the best of my knowledge, information and belief, or from information transmitted by a person with knowledge, I certify that these records were made at or near the date they are identified, were kept in the course of the regularly conducted business activity of Manville, and it was the regular practice and the business activity of Manville to make the records.

6. Attached are documents found among the microfilm collections at the Facility. These documents, bates labeled CRMC-Talc-Micro-000001 through CRMC-Talc-Micro-005259, are true and correct copies of documents found at the Facility.


Margaret J. Baumgardner

STATE OF COLORADO)
) ss.
COUNTY OF ARAPAHOE)

Subscribed and sworn to before
me this 27th day of January, 2017.




Notary Public