

Carbide's counsel.

INTERROGATORY NO. 53: If your answer to any subpart of Interrogatory No. 52 is "Yes":

- (a) Identify the library(ies) involved and state the years during which Defendant, its predecessor or related company was a member of, or otherwise had use of or access to said library; and
- (b) If applicable, identify the organization or association through which Defendant, its predecessor or related company, obtained the use of or access to, such library(ies).

RESPONSE:

See Union Carbide's Response to Interrogatory No. 52, including all objections set forth therein.

INTERROGATORY NO. 54: Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to, any insurance company, at any time, conducted any industrial hygiene surveys concerning any product identified in response to Interrogatory Nos. 19, including, but not limited to, surveys concerning the manufacture, processing, application, installation, use and/or removal of said products?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. 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 started in 1963.

In addition, Union Carbide monitored asbestos dust levels at both its own facilities and its Calidria customers' facilities. Union Carbide monitored the asbestos dust levels at its King City facility from September 1963 to June 1985, and starting in around 1972, at Union Carbide's expense, Union Carbide provided to its customers free air monitoring of asbestos dust levels. The results of the air monitoring tests of Union Carbide's customers were provided so that