

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER:

See Union Carbide's response to Interrogatory No. 4, including the objections set forth therein.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- (a) As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- (b) The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.
- (c) The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
- (d) The date each of the named products was placed on the market.
- (e) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.
- (f) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.
- (g) The date asbestos was removed from such products, if ever, and the reasons therefor.
- (h) A description of the physical appearance of each of the named products.
- (i) A detailed description of the intended uses of the named products.
- (j) Identify the last year that you sold each asbestos-containing product.

ANSWER:

See General Objection No. 4. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

The following divisions or subsidiaries of Union Carbide operated the Calidria business during the course of its existence:

Corporate Divisions of Calidria (1963-1985)

(1963-1965)	Nuclear Division
(1965-1967)	Mining and Metals Division
(1967-1970)	Chemicals and Plastic Division
(1970-1984)	Mining and Metals Division
(1984-1985)	UMETCO, a wholly owned subsidiary of Union Carbide, through Calidria Corporation, a wholly owned subsidiary of UMETCO.

Calidria consisted of raw chrysotile asbestos in a unique short-fiber formulation which Union Carbide mined at or near King City, California. Calidria's chemical formula is $Mg_6(OH)_8Si_4O_{10}$. Union Carbide produced four grades of Calidria asbestos: standard, super standard, high purity, and resin grade; the different grades reflect varying degrees of purity of content. Each grade was sold in both pelletized and fibrous form. In appearance, Calidria is grey (pelletized) or white (fibrous) in color and powdery in substance. The following is a representative listing and description of the various brands of Calidria mined and marketed by Union Carbide:

<u>PRODUCT SYMBOL</u>	<u>PRODUCT CODE</u>	<u>DESCRIPTION</u>
HPO	651001	High Purity, Open Fiber
HPO-C	651101	High Purity, Open Fiber
HPP	651601	High Purity, Pellets
HPP-JAP	651701	High Purity, Pellets, 4-Ply bags
R-G 110 652101	Resin-Grade, Open Fiber	15 % +325
R-G 110-D	652201	Resin-Grade, Open Fiber, 15 % +325
R-G 144 652501	Resin-Grade, Open Fiber	
A-14	652801	Resin-Grade, Open Fiber
R-G 244 653001	Resin-Grade, Open Fiber	
R-G 444-0	653301	Resin-Grade, Open Fiber, 10% Stearic

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A-28	653601	Resin-Grade, Open Fiber, Silica Treated
SG-100	654001	Standard Grade, Pellets
SG-102	654201	Standard Grade, Pellets, 100-lb. bags
SG-130	654501	Standard Grade, Open Fiber, 30 % +325
SG-144	654801	Standard Grade, Open Fiber, 45 % +325
SG-200	655001	Super Standard Grade, Pellets
SG-210	655301	Super Standard Grade, Open Fiber, 15 % +325
SG-444-0	655501	Standard Grade, Open Fiber, 5 % Stearic, Hydrophobic
T-135-0	656001	High Purity, Open Fiber, Titanated, 35 %, Anatase
T-135-P	656301	High Purity, Pellets, Titanated, 35 %, Anatase
CG-100	656601	Coatings Grade, Pellets
CG-135-0	656801	Coatings Grade, Open Fiber, Titanated 35 %, Rutile
CG-135-P	656901	Coatings Grade, Pellets, Titanated, 35 %, Rutile
	657301	Super-Visbestos Super Standard Grade, Cracked Pellets Visbestos
	657601	Standard Grade, Open Fiber Oilbestos
	657001	Standard Grade, Open Fiber, 5 % Stearic, Hydrophobic

Calidria, due to its unique physical properties, short fiber length in particular, was not suited for use in thermal or frost insulation.

Calidria consisted of raw asbestos which was marketed and sold by Calidria distributors to manufacturers or producers who incorporated and used Calidria in their products or production processes. Calidria was not sold by Union Carbide or, according to the best information available to Union Carbide, by Calidria distributors to consumers or

other "end-users". The following is a representative list of different brands of Calidria asbestos and the applications for which they were marketed:

<u>Calidria Product</u>	<u>Applications</u>
SG-100	Vinyl-Asbestos Floor Tile
SG-130	Masonry Coatings
SG-200	Rubber Floor Tile
Super Visbestos	Drilling Muds
SG-210	Mastics Asphaltic Coatings
HPP	Rubber Sheet Goods Mineral Board (Japan) Paper (Japan)
HPO	Asphaltic Coatings, Adhesives
RG-110	Asphaltic Spray Coatings Aluminized Coatings Mastics, Caulks and Sealants
RG-144	Adhesives (Epoxy, Casim, Phenolics) Coatings Vinyl Plastics (High Build, Dip Coatings) Mastics, Caulks and Sealants (Vinyl, Butyl, Polysulfide, Bituminous)
RG-244	Polyester Resins (Laminating, Gel Coats, Putties) Caulks and Sealants (Vinyl,

Butyl, Acrylic, Polyurethane)
Coatings (Epoxy, Urethane, Asphaltic)

In addition to the different markets in which the Calidria products listed above were respectively sold, other brands of Calidria may have been sold within the same markets. Such brands of Calidria were distinguished on the basis of grade (purity of content), form (fibrous or pelletized) or chemical treatment, or a combination of the above.

See also Union Carbide's responses to Interrogatories 4 and 5.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

- (a) A description of each such document.
- (b) The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER:

See General Objection No. 4. Union Carbide also objects to this Interrogatory on the grounds it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this interrogatory on the grounds that it is vague, ambiguous and unclear. Subject to its objections, Union Carbide responds as follows:

Calidria was not an asbestos-containing product, but rather consisted of raw fiber sold in pelletized or fibrous form. See UCC's response to Interrogatory No. 6.

Union Carbide maintains a repository of asbestos-related documents. Some of the documents contain information about the mining and milling process. Upon Plaintiff's request, Union Carbide will make its Repository of Documents available to Plaintiff for review and replication at a suitable time and place.

Union Carbide's custodian of records for asbestos-related documents is Mrs. Elba Pozo, Kelley Drye & Warren, Two Stamford Plaza, Stamford, Connecticut 06901.

INTERROGATORY NO. 8:

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