

1969 - 1975 Oyster Creek Division

P.O. Box BB

Freeport, Texas 77541

Also, polyvinyl chloride was produced and sold at the Dow location in Midland, Michigan during the period 1953 to 1968.

(b)(ii). Yes.

INTERROGATORY NO. 10: If you are unable to answer preceding Interrogatory No. 9b(ii) in either the affirmative or negative, please explain with specificity all of the reasons why you are unable to answer in the affirmative or negative, and indicate with specificity the identity of all tangible sources and names and addresses of all persons and/or entities which you consulted in attempting to answer Interrogatory No. 9b(ii).

ANSWER:

Not applicable.

INTERROGATORY NO. 11: If your answer to preceding Interrogatory No. 9b(ii) is in the affirmative, for each entity, branch, division or subsidiary which manufactured sold, supplied, distributed, retailed and/or transferred such vinyl chloride, polyvinyl chloride, vinyl chloride monomer and/or chloroethylene to or for defendant B. F. Goodrich Chemical Company and/or defendant B. F. Goodrich Company, state the following:

- a. The dates of such sale, supply, distribution, retail and/or transfer;
- b. The specific B. F. Goodrich location to which there was a supply, sale, distribution, retail and/or transfer;
- c. The quantities of each such aforementioned supply, sale, distribution, retail and/or transfer.

ANSWER:

(a) Dow's sales records indicate that vinyl chloride was distributed to B. F. Goodrich in the State of Ohio in 1967, 1973, and 1974.

(b) Dow is unable to identify the locations where B. F. Goodrich ultimately utilized its product but delivery in 1967 was made to their Cleveland location. In 1973 and 1974 delivery was made to their Avon Lake location. However, Dow is advised that the product was not intended for use at the Avon Lake facility and, indeed, was not so used; rather, it was further distributed to other B. F. Goodrich locations.

(c) The quantities were as follows:

- (1) 1967 - 1,493,300 lbs.
- (2) 1973 - 371,340 lbs.
- (3) 1974 - 2,044,200 lbs.

INTERROGATORY NO. 12: If your answer to preceding Interrogatory No. 9b(ii) is in the affirmative, then for each entity, branch, division or subsidiary which supplied, sold, distributed, retailed and/or transferred vinyl chloride, polyvinyl chloride, vinyl chloride monomer and/or chloroethylene to defendant B. F. Goodrich Chemical Company and/or defendant B. F. Goodrich Company, state the following:

a. Between 1953 to and including 1975 was any vinyl chloride, polyvinyl chloride, vinyl chloride monomer and/or chloroethylene supplied, sold, distributed, retailed and/or transferred to the particular location of the B. F. Goodrich Chemical Company and/or the B. F. Goodrich Company at Avon Lake, Ohio;

b. If you are unable to answer preceding Interrogatory No. 12a in either the affirmative or negative, please explain