

FILE NAME: Packings and Gaskets (PAG)

DATE: 2002

DOC#: PAG065

DOCUMENT DESCRIPTION: Legal - Affidavit of Matthew Carroll

AFFIDAVIT OF MATTHEW CARROLL

STATE OF CALIFORNIA

COUNTY OF Santa Cruz§
§
§

BEFORE ME, the undersigned authority, on this day personally appeared, MATTHEW CARROLL, known to me or through his driver's license, and who, upon his oath, deposed and states as follows:

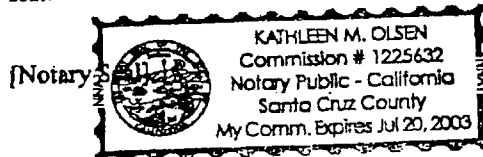
My name is MATTHEW CARROLL. I am over the age of eighteen (18) years, have never been convicted of a felony; and am fully competent to make this affidavit. The facts stated within this affidavit are within my personal knowledge and are true and correct.

Attached to this affidavit as Exhibit "A" are fiber release studies during gasket removal produced under my direction and control while I was an Industrial Hygienist working for Shell Oil Company at its Wood River, IL refinery. These documents were made at or near the time of the tests reflected on them by a person with knowledge of such tests. The documents attached as Exhibit "A" were made and kept in the ordinary course of Shell's business at the Wood River refinery by the Industrial Hygiene Department and it was the regular practice of the Industrial Hygiene Department to make and keep such tests. Each of these documents are genuine and authentic copies of originals made and kept by Shell in the ordinary course of their business.

And further the affiant sayeth not.

Matthew Carroll
MATTHEW CARROLL

Subscribed and sworn to before me, a notary public, in and for the State of California on this the 5th day of March, 2002 to certify which witness my hand and official seal.



Kathleen M. Olsen
NOTARY PUBLIC

My Commission expires: July 20, 2003



Shell Gasket Study

ION NO.

FILE 033220

[illegible]

PLAINTIFF'S DEPOSITION
EXHIBIT
Quisindarian
K.R. 5-31-99

SAMPLED BY (LAST NAME & INITIALS)		ACCOUNTING CODE		IHL NO. 033220	
CONDITION OF SAMPLE UPON RECEIPT ☒ OK ☐ Other (Describe)		DATE 3-12-83		DATE RECEIVED 0192	
ANALYZED BY E. Sanchez		LAB RECORD NO. 181624-pg. 100		WEEK DAY 0192	
METHOD NUMBER AND/OR DESCRIPTION 1105 H PG CAM 239		GROUP		BOX NO. OR SAMPLE LOCATION	
REFERENCE		METHOD CODE		ASBOM	
ANALYTICAL RESULTS		NUMBER OF ANALYSIS		1	
		DATE REPORTED (WEEK - DAY)		11-2	
		BENCH HOURS (XXX.X)			
		EXPOSURE CALCULATION			
		TWA, PEAK			
UNITS: ☐ PMV ☐ PM10 ☒ f/cc					
WRMC 033220 = 4.86 f/cc					
= 28.4 f/cc					
SUPERVISING CHEMIST		NO - NONE DETECTED (REPORT LIMIT OF DETECTION)		CALCULATED BY	
E. Sanchez					

[illegible]

[illegible]

WORKSHEET FOR
SAMPLING FORM

NAME EMPLOYER SOCIAL SECURITY NUMBER EMPLOYEE NUMBER JOB EXPOSURE PROFILE JOB TITLE EMPLOYEE'S COMPANY LOCATION SHELL FACILITY (if owned) AREA/UNIT OPERATING CONDITIONS OPERATION START TIME 1333		SENT TO H.O. IHL NO. 033217		ANALYSIS REQUIRED CODE 900508 NAME Culbster RESULT 0.53 UNIT 10PPMV 50MG 20MGMS 60FIBER 30PMV 70XWT 40FIBER/ 80XVOL 80 DATE SAMPLED 02/20/85 SHIFT 1 2 3 SAMPLED BY MR. CARROLL 236-2144 RETURN RESULTS TO MR. CARROLL WMC	
1 PERSONAL TWA 2 PERSONAL PEAK 3 AREA 4 BLANK 5 BULK 6 DIAS CONTROL 7 DISOURCE 8 POSSIBLE INTERFERENCE/INSTRUCTIONS		1 CHARCOAL TUBE 2 FILTER (RESP.) 3 FILTER (TOTAL) 4 IMPINGER 5 PASSIVE 6 DISMETER 7 OSILICA GEL 8 TEMPERATURE HUMIDITY BAROMETER IN. HG WIND M.P.H. WORK TASK pump on dusts are collected while pump filter burns off diesel when fuel is on activity is to be done 02/20/85 for station. replaced about 4:15 away on lunch. replacement potential importance of help in working correctly 1253 pump off		SAMPLE NO. WRC022085-6 DESCRIPTION OF COLLECTOR MODEL NO. ETC. 0.5LL MGC 0-184 TIME AT TASK INSTR. READING PE SKETCH AREA (and of Remarks)	
INSTRUMENT TYPE & MODEL NO. MSA CALIBRATED BY DATE 02/20/85 REFERENCE METHOD over bubble VOLUME PER COUNT FLOW RATE 2.0 lpm SAMPLING TIME 20 MIN. NET 40		INFORMATION FOR TWA DETERMINATION - LENGTH OF SHIFT 1 MIN. - DOES THIS SAMPLE REPRESENT EXPOSURE OVER THE ENTIRE SHIFT? ☐ YES ☐ NO - IF NO: - INCLUDE RESULTS FROM ADDITIONAL SAMPLES (ATTACHED) - ACTION ZERO EXPOSURE FOR MINUTES OF SHIFT DURING PERIOD NOT SAMPLED - TWA CANNOT BE CALCULATED FROM THESE SAMPLES. - WAS A RESPIRATOR WORN DURING SAMPLE TO CONTROL EXPOSURE? ☐ YES ☐ NO - DID ANY SIGNIFICANT SKIN CONTACT OCCUR? ☐ YES ☐ NO		COMMENTS H	
PLANT'S DEPOSITION EXHIBIT K.A. 5-31-89		DATA CLASSIFICATION CLASSIFIED BY MR. CARROLL 3/19/85 REVIEWED BY DATE			

SAMPLED BY (LAST NAME & INITIALS)		ACCOUNTING CODE	
CONDITION OF SAMPLE UPON RECEIPT		812715	
☒ OK	☐ Other (Describe)		
ANALYZED BY		DATE	LAB RECORD NO.
K. Y. (Yours)		3-12-85	LE16947-Pg. # 100
METHOD NUMBER AND/OR DESCRIPTION			
M05A POCAM 239			
GROUP		METHOD CODE	ASBOM
NUMBER OF ANALYSIS		DATE REPORTED (WEEK - DAY)	11-2
BENCH HOURS (XXXX)			
ANALYTICAL RESULTS		EXPOSURE CALCULATION	
UNITS: ☐ ppmv ☐ mg/m3 ☒ ppb		TWA, PEAK	
400MC 03.2085-6 = 0.07 f/psid			
= 0.52 f/sec			
SUPERVISING CHEMIST		CALCULATED BY	
BHM		NO - NONE DETECTED (REPORT LIMIT OF DETECTION)	