

- (a) Not applicable.
- (b) OSHA 1910.1017 (1974) and the previous Emergency Temporary Standard. Also the OSHA Nuisance Dust Standard.

QUESTION 12. At the time of the development of each "PVC product" listed in Answer 6, did you attempt to determine whether the product complied with any applicable safety standards, orders or rules, regulations or design requirements promulgated by any professional society or association?

- (a) If the answer is in the negative, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis.
- (b) If the answer is in the affirmative, identify the safety standards, safety orders, rules, regulations, which you claim you considered by naming the title, number, page and date of the regulation and identifying the place where a copy can be obtained of said regulations.

ANSWER 12. Yes. See answer to Interrogatory No. 11. See also the 500 ppm threshold limit for VCM established by the American Conference of Governmental and Industrial Hygienists in 1961, and revised to 200 ppm in 1974.

QUESTION 13. With respect to each "PVC product" listed in Answer 6, state whether there has been any change, alteration or modification (hereinafter collectively called "change") from when it was first developed to the present. If so, state:

- (a) The nature of each such change.
- (b) The reason for such change.
- (c) The details of how the changed product differed from the original product.
- (d) The names of each person recommending and/or approving such change.
- (e) The date each change was accepted by you and made commercially available.
- (f) Whether there were any studies, evaluations, or tests made in connectin with such change, and if so, identify each such study by title, date, name of author and present location and custodian.

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ANSWER 13. The Company maintains an on-going program to improve its products. As part of this program, numerous small changes have been made through the years. These changes are checked for effect on resin physical properties and effect on customer specification. Any major changes in the resin are accompanied by a new product identification number.

QUESTION 14. Did Defendant ever recommend to purchasers or users of the "PVC product" listed in your Answer 6 that respirators, protective masks and/or protective clothing be worn with the product, or that ventilation and emission equipment be installed? If so, state:

- (a) The date or dates when such recommendation was made to customer, or any other users.
- (b) The date or dates when each such recommendation was made to each user.
- (c) Who made the recommendation?
- (d) Who received the recommendation?
- (e) If oral, the manner and substance of the recommendation.
- (f) If written, identify the document by title, date, file designation and author of each such recommendation and the location and present custodian of each such recommendation.

ANSWER 14. See answers to Interrogatory Nos. 8 and 9. The VCM standard by OSHA regulated all personal protective measures, including respiratory devices and clothing requirements. If the VCM concentrations exceeded the limits set forth in the standard, respiratory protection was required.

QUESTION 15. Have you undertaken or financed any studies to determine what type of respirators, protective masks, ventilation equipment and emission equipment would either eliminate or afford maximum protection against the inhalation of "VCM"? If so, state: