

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF COLORADO

CONSOLIDATED CIVIL ACTION NO. 83-K-1756

CIVIL ACTION NO. 84-K-912

DEPOSITION OF HOWARD STEPHENS

ORIGINAL

KEITH EDWIN GIBSON and DELLA GIBSON,
(BEULAH COLCORD, as surviving spouse of JOHN W.
COLCORD, and as Personal Representative of the
Estate of JOHN W. COLCORD,
Plaintiffs,

VS.

ARMSTRONG WORLD INDUSTRIES, INC., et al.,

Defendants.

PURSUANT TO NOTICE, the
above-entitled deposition was taken on behalf of
the Plaintiffs at 562 White Avenue, Grand Junction,
Colorado, on May 18, 1987, at 10:15 a.m., before
Dawn E. Calderwood, Registered Professional
Reporter and Notary Public.

1 APPEARANCES:

2 For the Plaintiffs: J. CONARD METCALF
 3 Williams, Trine,
 4 Greenstein & Griffith
 1435 Arapahoe Avenue
 Boulder, Colorado

5 For John Crane BRYAN P. STREELMAN
 6 Packing Company: Henderson and Streelman
 7 650 So. Cherry Street
 Suite 102
 Denver, Colorado

8 For Howard Stephens: WALTER J. PHILLIPS
 9 Elder & Phillips
 562 White Avenue
 Grand Junction, CO

10

11 EXAMINATION INDEX

12

13 BY MR. METCALF Pages 3, 23
 MR. STREELMAN Pages 12, 23

14

EXHIBIT INDEX

15

FOR IDENTIFICATIONINITIAL
REFERENCE

16

17 Defendant's Deposition Exhibit
 Letter to State Compensation
 Insurance Fund from Stephens
 18 dated January 4, 1984

19

20 Defendant's Deposition Exhibit
 Letter to American Motorists
 Insurance Company from Stephens
 21 dated October 26, 1983

22

23

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P R O C E E D I N G S

WHEREUPON, the following
proceedings were taken pursuant to the Federal
Rules of Civil Procedure.

* * * * *

HOWARD STEPHENS,
having been first duly sworn to state the whole
truth, testified as follows:

(Two defendant's deposition exhibits
were marked for identification, numbers to be
supplied by Mr. Streelman)

EXAMINATION

BY MR. METCALF:

Q. Mr. Stephens, my name is Conard
Metcalf, and I represent Beulah Colcord in this
case.

Could you tell us your name, please.

A. Howard Stephens.

Q. What is your address?

A. Post Office Box 27 in Bedrock,
Colorado.

Q. What is your age?

A. Thirty-nine.

Q. What was the last year of school you
completed?

1 A. High school, 12th grade.

2 Q. Where was that?

3 A. Nucla, N-u-c-l-a, Colorado.

4 Q. Are you employed at this time?

5 A. Yes, I am.

6 Q. Where are you working?

7 A. UMETCO Minerals Corporation.

8 Q. What is your job there?

9 A. I am the safety engineer and radiation
10 officer.

11 Q. In the past, have you been employed by
12 Union Carbide in Uravan?

13 A. Yes.

14 Q. When did you go to work for Union
15 Carbide in Uravan?

16 A. July or August of 1976.

17 Q. When did you last work for Union
18 Carbide at Uravan?

19 A. UMETCO Minerals is a subsidiary of
20 Union Carbide. I basically still work for Union
21 Carbide.

22 Q. You are no longer at Uravan?

23 A. I am at Uravan, yes.

24 Q. What are your current job duties and
25 responsibilities?

1 A. High school, 12th grade.

2 Q. Where was that?

3 A. Nucla, N-u-c-l-a, Colorado.

4 Q. Are you employed at this time?

5 A. Yes, I am.

6 Q. Where are you working?

7 A. UMETCO Minerals Corporation.

8 Q. What is your job there?

9 A. I am the safety engineer and radiation
10 officer.

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12 Union Carbide in Uravan?

13 A. Yes.

14 Q. When did you go to work for Union
15 Carbide in Uravan?

16 A. July or August of 1976.

17 Q. When did you last work for Union
18 Carbide at Uravan?

19 A. UMETCO Minerals is a subsidiary of
20 Union Carbide. I basically still work for Union
21 Carbide.

22 Q. You are no longer at Uravan?

23 A. I am at Uravan, yes.

24 Q. What are your current job duties and
25 responsibilities?

1 A. To administer the safety program in
2 Uravan and also to administer the radiation safety
3 program.

4 Q. When you went to work for Union
5 Carbide in 1976, what was your job title?

6 A. Safety engineer.

7 Q. And what were your job duties and
8 responsibilities at that time?

9 A. To administer the Union Carbide safety
10 program.

11 Q. At some point, did your job title
12 change at Union Carbide at Uravan from safety
13 engineer to something else?

14 A. I took on some more responsibilities
15 in 1979, which is the radiation safety portion.

16 Q. As part of your job duties, from 1976
17 on at Union Carbide, Mr. Stephens, was a part of
18 your job to be familiar with potential health
19 hazards to Union Carbide employees from any of the
20 materials that they were working with?

21 A. Yes.

22 Q. Did, at some point, you become aware
23 of whether or not there was any potential health
24 hazard that was associated with any asbestos
25 products that employees might be working with at

1 Uravan?

2 A. We were aware of asbestos products but
3 not as aware as we would have been if we were
4 manufacturing a product. We didn't feel like we
5 had the asbestos in the plant at the time before
6 Jack Colcord died. And after that period, we
7 became well aware of the asbestos products.

8 Q. Before 19 -- when you became -- came
9 on board at Union Carbide in 1976 at Uravan as a
10 safety engineer, at that time, did Union Carbide
11 have any program or policy with regard to
12 employees who might be working with asbestos
13 products?

14 A. Prior to 1976?

15 Q. Correct.

16 A. I'm not for sure if they did or not.

17 Q. How about in 1976 after you started
18 work there?

19 A. We started getting information about
20 asbestos through the divisonal and corporate
21 people.

22 Q. About when was that?

23 A. Probably somewhere around 1979 or
24 maybe even a little bit later.

25 Q. Would you have been the person at

1 Union Carbide to get that information in about '79
2 and then pass it on to employees who needed to be
3 informed about it?

4 A. Yes.

5 Q. As part of your employment as safety
6 engineer and safety engineer with radiation
7 responsibilities at Union Carbide, did you, from
8 time to time, conduct investigations concerning
9 job-related injuries or diseases to employees at
10 Union Carbide?

11 A. More on line of job-related injuries.
12 We didn't -- at that time, we didn't have any
13 job-related diseases that we were aware of.

14 Q. In any event, you did have the
15 responsibility for conducting investigations into
16 job-related injuries?

17 A. Yes.

18 Q. Circumstances surrounding the
19 injuries?

20 A. Yes.

21 Q. And that was part of your regular job
22 at Union Carbide?

23 A. Yes.

24 Q. When a situation came up where you had
25 to conduct an investigation into a job-related

1 injury, what was your normal procedure for doing
2 an investigation?

3 A. We would try to gather all the
4 evidence that we could. I see we -- in
5 reference -- we have a program where not just
6 myself does the investigation but the safety
7 engineer, the supervisor, the plant
8 superintendent, and if the case is serious enough,
9 even as far as corporate safety and health
10 people -- we'll conduct an investigation and try
11 to gather all the information that we can possibly
12 gather and write a report.

13 Q. And do these reports that you write,
14 then -- do you occasionally write the reports?

15 A. Yes.

16 Q. And the reports that you write, are
17 they done in the normal course of your employment
18 and duties at Union Carbide?

19 A. Yes.

20 Q. Did you have occasion, while employed
21 at Union Carbide at Uravan, to conduct an
22 investigation in a situation involving Jack
23 Colcord?

24 A. Yes.

25 Q. What did that investigation consist of

1 with regard to Jack Colcord?

2 A. Initially, I got a letter from -- I
3 want to say Dr. Bechtel. I'm not for sure if
4 that's the name.

5 Q. He's one of the doctors involved in
6 this.

7 A. According to the death certificate, it
8 indicated that he died of an asbestos-related
9 disease. And exposure would probably have been 20
10 to 30 years prior to his death.

11 So that triggered my investigation to
12 start from the time he started work through
13 somewhere in the neighborhood of about 1969 or
14 1970.

15 Q. And with regard to that investigation,
16 from the time he started work through up to '69 or
17 '70 -- first of all, did you determine when
18 Mr. Colcord started work at Union Carbide?

19 A. Yes, I did.

20 Q. And what was that? When was that?

21 A. 1948.

22 Q. And did you determine whether or not
23 Mr. Colcord had been continually employed at Union
24 Carbide between 1948 and 1969 and 1970?

25 A. Yes.

1 Q. Had he been continually employed
2 during that period?

3 A. Yes, he had.

4 Q. Did you conduct an investigation to
5 determine whether or not Mr. Colcord -- what his
6 job duties had been between 1948 and 1969 or '70?

7 A. Yes, we did.

8 Q. What did you determine about his job
9 duties during that period?

10 A. He became a storekeeper in 1949, and
11 he transferred out of the warehouse -- he worked
12 as a storekeeper until November the 1st, 1968.
13 And then he took the position of a sample bucker,
14 and he was promoted to a maintenance mechanic in
15 1969.

16 Q. And based on this investigation, did
17 you determine whether or not there were any
18 potential asbestos exposures that Mr. Colcord
19 would have had between 1949 and 1969 or '70?

20 MR. STREELMAN: Can we stipulate to
21 the -- I am going to object to the foundation. I
22 don't think that he's qualified to determine the
23 content of the materials. I don't think he's
24 going to be qualified as an expert witness to
25 identify them. If we can make that stipulation --

1 MR. METCALF: I'm not going to try to
2 qualify him as an analytical chemist.

3 Q. (By Mr. Metcalf) What did you
4 determine about any potential asbestos exposures
5 that Mr. Colcord had between 1949 and 1969 and
6 '70?

7 A. Just that there were asbestos products
8 present in the warehouse and that Mr. Colcord
9 could have used and distributed these asbestos
10 products.

11 Q. In your investigation, did you
12 determine, generically, what types of asbestos
13 products would have been in the warehouse between
14 1949 and '69 or '70?

15 A. We developed a list of possible
16 asbestos products, yes.

17 Q. What did this list consist of?

18 A. Asbestos gloves, asbestos sheets that
19 they would use for fire retardant, various types
20 of asbestos ropes. There was some asbestos
21 insulation; there was some sack insulation, plus
22 some preformed insulation.

23 Q. And would these types of products,
24 based on your investigation, have been present
25 between 1949 and 1969 or '70 at the Uravan

1 warehouse?

2 A. Most of them were, yes.

3 Q. Did your investigation look into
4 whether or not there had been any work rules at
5 Union Carbide before 1969 or 1970 with regard to
6 employees handling or working around
7 asbestos-containing materials?

8 A. Yes.

9 Q. What did the investigation reveal with
10 regard to that?

11 A. With regard to, specifically,
12 asbestos, we didn't have any. However, we do have
13 a safety work procedure regarding materials that
14 are potentially dangerous.

15 Q. Just before 1969 or '70, the Uravan
16 facility of Union Carbide was not informed
17 concerning asbestos-related hazards; is that
18 correct?

19 A. Yes.

20 MR. METCALF: I have no further
21 questions.

22 EXAMINATION

23 BY MR. STREELMAN:

24 Q. Mr. Stephens, can you tell me more
25 about what the safety program is that you

1 administer?

2 A. I administer the training portion of
3 the safety program, investigations. The Uravan
4 safety program involves -- you know, it's quite
5 complicated when it gets into the supervisory
6 portion of the safety program.

7 We have programs from safety rule
8 enforcement to disciplinary action, accident
9 investigations, refresher training. I would have
10 to have an entire book in order to explain the
11 entire program to you.

12 Q. Is the program developed as a matter
13 of corporate policy?

14 A. Yes.

15 Q. Or corporate assistance?

16 A. Yes.

17 Q. Are you familiar with a company called
18 Calidria?

19 A. No.

20 Q. It's a Union Carbide subsidiary.

21 A. In King City?

22 Q. King City is the new name.

23 A. King City, is that the one you are
24 talking about? I do know they did make
25 asbestos-containing products at one time. Yes, it

1 used to be Union Carbide in King City; and I
2 believe they changed the name to Calidria.

3 Q. What does the radiation safety program
4 consist of?

5 A. Administering the State Department of
6 Health's radioactive materials' license, sampling
7 exposure calculations of employees; and, basically
8 the same thing that we do in the safety end of
9 it -- training, education.

10 Q. Do you still have employees in Uravan?

11 A. A few, yes.

12 Q. What are their duties, or what do they
13 do?

14 A. Mostly it's heavy equipment operators
15 now.

16 Q. Are you covering up the tailings
17 piles?

18 A. Yes, we are in the remedial action
19 process.

20 Q. Have you ever seen this before
21 (indicating)?

22 MR. METCALF: Object as being beyond
23 the scope of direct.

24 THE DEPONENT: In this context?

25 Q. (By Mr. Streelman) What I'm going to

1 get to is if you were involved with it.

2 A. With the licensing?

3 Q. Yes.

4 A. Yes, I have been. But I haven't seen
5 this particular one.

6 MR. METCALF: Do we have some
7 identification on the record as to what this
8 document is which is being referred to and to
9 which I objected to as being beyond the scope of
10 direct?

11 Q. (By Mr. Streelman) Can you identify
12 that?

13 A. I believe it's an accident decree.

14 MR. METCALF: Maybe read what it says
15 on the front page of that document, on the cover
16 of it ns that the final licensing statement for
17 the Uravan uranium mill?

18 THE DEPONENT: Right.

19 MR. METCALF: It's in about an inch
20 thick document in a blue loose-leaf cover; is that
21 right?

22 THE DEPONENT: Yes.

23 Q. (By Mr. Streelman) So we are talking
24 about the same document you have talked about, is
25 that --

1 A. I think it's the same document. I
2 would have to go through it and see.

3 Q. How many documents have you seen that
4 pertain to --

5 MR. METCALF: Could I have a
6 continuing objection based on the scope?

7 MR. STREELMAN: Yeah.

8 Q. (By Mr. Streelman) How many documents
9 have you seen that would pertain to the final
10 licensing statement for the State of Colorado's
11 radiation license?

12 A. Hundreds of them right now. We are in
13 our remedial action project now. And everything
14 that we do, we have to write a procedure on. And
15 we are getting hundreds of pages of procedure
16 material right now from our consultants.

17 Q. Are you administering -- what are you
18 administering down there vis-a-vis this
19 (indicating)?

20 A. My portion of this book is to
21 administer the radiation safety and health
22 portions of this decree.

23 Q. And does that include monitoring?

24 A. Radiation monitoring, yes.

25 Q. And reporting to the State?

1 A. Reporting to the State.

2 Q. Specifically, what types of particles
3 are you monitoring?

4 A. As far as the health license goes, we
5 are reporting radionuclide exposure of the
6 employees to the State.

7 Q. Being alpha, beta and gamma?

8 A. Alpha, beta, and gamma.

9 Q. Have you, personally, monitored
10 employee housing?

11 A. Yes.

12 Q. For the presence of what?

13 A. Personally, I've monitored employee
14 housing for the presence of alpha and gamma
15 contamination of the house, itself.

16 Q. Alpha, being a breakdown of radon 222,
17 being an energy released from radon 222?

18 MR. METCALF: I am going to
19 additionally object to beyond the scope of direct
20 and add relevancy and foundation to my objection.

21 THE DEPONENT: Do I --

22 MR. METCALF: Go ahead and answer it.

23 THE DEPONENT: Yes, alpha particles
24 are from radon 222. And sometimes, in a
25 restricted area, they release guidelines --

1 guidelines say we can't release a material if it's
2 over a certain activity.

3 And we went ahead and extended that
4 beyond the restricted area to the employee
5 housing. And we do an alpha scan plus a gamma
6 survey in the housing.

7 Q. (By Mr. Streelman) Were there any
8 unions at the Uravan site?

9 A. Yes.

10 Q. What unions were there?

11 A. United Steel Workers.

12 MR. METCALF: Same objections.

13 Q. (By Mr. Streelman) Do you happen to
14 know if Mr. Colcord belonged to that union?

15 A. No, I don't.

16 Q. Would those records be available?

17 A. Yes, they would.

18 Q. Do you know where?

19 A. In the employee relations department.

20 Q. What does a sample bucker do?

21 A. He breaks down soil samples. The
22 definition is you buck samples. That includes
23 collecting the sample, putting the sample in a
24 sack, weighing the sample -- I don't believe he
25 does analyzing of the sample -- and prepares the

1 sample for shipping to the lab.

2 Q. Was that a job that required
3 respiration devices, respiration protection?

4 A. Sometimes it did but not very often.
5 There was a ventilation, forced ventilation in
6 that area. If the ventilation was out, then they
7 would have to wear a respirator, yes.

8 Q. Was any monitoring ever done in that
9 area for the presence of any of the particles we
10 discussed?

11 MR. METCALF: Restate my objection.

12 THE DEPONENT: Yes.

13 Q. (By Mr. Streelman) Mr. Colcord died
14 in 1983. And it was your opinion that his
15 asbestos exposure would have been 20 to 30 years
16 before that time?

17 A. Yes. Not my opinion, that was from
18 letters that I read from that doctor.

19 Q. So that led to the type of
20 investigation you did?

21 A. Yes, it did.

22 Q. So it would have been, roughly, '53
23 through '63?

24 A. Uh-huh.

25 Q. Did you have any personal knowledge of

1 the materials that were at the plant at that time?
2 And if you didn't, how did you verify what was
3 there?

4 A. Concerning asbestos?

5 Q. Yes.

6 A. I, personally, did not have any
7 knowledge at that time, other than that we had a
8 few asbestos blankets. I knew where there was
9 some old asbestos insulation, and I knew that some
10 of the insulation ropes were used in the acid
11 plant.

12 Q. So rope was specifically used for acid
13 application?

14 A. Yes.

15 Q. Now, when you started to do your
16 investigation into materials that Mr. Colcord may
17 have come into contact with, did you look at any
18 other potential toxins or dangerous chemicals? Or
19 did you just look for asbestos-containing
20 products?

21 A. Just looked for asbestos-containing
22 products.

23 Q. Why was that?

24 A. That was -- again, the letter we got
25 from Dr. Bechtel indicated that it was an

1 asbestos-related disease, so that's what we were
2 looking for.

3 Q. And you did find that he had been
4 exposed to rope and insulation for pipes during
5 that relevant period of time?

6 A. Uh-huh.

7 MR. METCALF: I'm sorry; you will have
8 to answer out loud.

9 THE DEPONENT: Yes.

10 Q. (By Mr. Streelman) Let's go through
11 your deposition real quick, and I will be done.

12 What two minerals were mined at
13 Uravan?

14 A. Uranium and vanadium.

15 Q. Do you have any experience with these
16 asbestos blankets that you mentioned?

17 A. Yes.

18 Q. Can you describe them?

19 A. It's a tightly woven blanket that they
20 used as a fire retardant. A lot of times they
21 would use them -- they would do a welding job, and
22 then they would put this blanket over the weld to
23 keep it from cooling down too quickly. It was a
24 tightly woven asbestos product.

25 Q. When in use -- did you ever see it in

1 use?

2 A. Yes.

3 Q. Did any dust come off of this type of
4 blanket?

5 A. No.

6 Q. Now, the last exposure, according to
7 your letter of January 4th, 1984, to asbestos
8 products was in 1969, August 29th of 1969. If you
9 want to refer to your letter, feel free.

10 A. Okay. We went beyond this, the letter
11 I wrote there. And Mr. Colcord did have some
12 exposure, I believe it was a year before he passed
13 away.

14 Q. Okay.

15 A. I can't remember the date on that for
16 sure.

17 MR. PHILLIPS: Do you have the date of
18 that letter?

19 MR. STREELMAN: January 4th, 1984,
20 from Mr. Stephens, from his office.

21 MR. STREELMAN: Mr. Stephens, I think
22 that's all I need to ask you. Conard?

23 MR. METCALF: I just have one other
24 question -- at least I hope it's just one.

25

1 FURTHER EXAMINATION

2 BY MR. METCALF:

3 Q. Mr. Stephens, to your knowledge, does
4 Union Carbide, whenever it knows or suspects a
5 potential health hazard for those materials
6 encountered in the workplace, take all reasonable
7 precautions to protect those employees?

8 A. Yes, we do.

9 MR. METCALF: I have no other
10 questions.

11 MR. STREELMAN: I do need to ask one
12 further question.

13 FURTHER EXAMINATION

14 BY MR. STREELMAN:

15 Q. Do you recall giving a deposition in
16 1984 involving Mr. Colcord?

17 A. Yes, I do.

18 Q. I'm using this to jog your memory; I
19 am not trying to trap you here.

20 MR. METCALF: Better check for your
21 billfold.

22 Q. (By Mr. Streelman) It's referring to
23 blankets.

24 MR. METCALF: Object as being beyond
25 the scope of redirect.

1 Q. (By Mr. Streelman) The question was:
2 "But the blankets definitely are, you know,
3 around?"

4 Your answer was: "There are still a
5 couple of them around."

6 "If a person were to shake these
7 materials, the asbestos gloves or blankets, does
8 that give off materials into the air? Do you
9 know?"

10 You say: "As far as releasing
11 asbestos, as far as releasing visible airborne
12 asbestos -- and you said -- shaking any kind of
13 blanket, you are going to get some kind of dust,
14 yes."

15 Did you have experience with that?

16 A. We would take a new blanket, and we
17 would shake it. And we did not see any dust from
18 it.

19 This question, I believe, was
20 referring to a blanket that was out in the mill.
21 And, yes, there is dust on those blankets. And I
22 suppose it's not my place to say it was asbestos
23 or other dust.

24 Q. So a used blanket would have a
25 tendency to have accumulated something?

1 A. Yes, uh-huh.

2 MR. STREELMAN: That's all I have.

3

4

5 (Whereupon, the deposition was

6 concluded at 10:45 a.m.)

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I have read the foregoing transcript of my testimony and have indicated same by my signature.

WAS by hand
HOWARD

HOWARD STEPHENS

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

Subscribed and sworn to before me
by the said HOWARD STEPHENS, this 29th
day of May, 1987.

My commission expires: 3-22-89

ORIGINAL

Christa J. Heywood
Notary Public

Notary Public

Box 342, Nuala Co. 81424
Address

Address

CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, Dawn E. Calderwood, a Registered Professional Reporter and Notary Public for the State of Colorado, do hereby certify that previous to the commencement of the examination, the said HOWARD STEPHENS was duly sworn by me to testify the truth in relation to the matters in controversy between the said parties; that the said deposition, consisting of 25 pages, was taken in shorthand by me and was reduced to typewritten form by computer-aided transcription; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had; that I am not attorney nor counsel nor in any way connected with any attorney or counsel for any of the parties to said action or otherwise interested in its event.

IN WITNESS WHEREOF, I have hereunto affixed
my hand and notarial seal this 22nd day of May,
1987.

My commission expires: September 10, 1990.

Dawn E. Calderwood

DAWN E. CALDERWOOD
Registered Professional Reporter

1 CALDERWOOD/MACKELPRANG & ASSOCIATES
2 1462 Glencoe Street
3 Denver, Colorado 80220

4
5 May 22, 1987

6 Mr. Howard Stephens
7 P. O. Box 860
8 Nucla, Colorado 81426

9
10 Re: Colcord vs. Armstrong, et al.

11 Your deposition in the above-entitled cause has
12 now been transcribed. The court rules require
13 that we file your deposition promptly. Therefore,
14 please review and sign your deposition and
15 correction sheets, if any, before a Notary Public
16 and return to our office . . .

17 _____ within 30 days to comply with the
18 statute.

19 _____ X by June 3, 1987, so the
20 deposition may be filed in time for
21 trial.

22 If you do not call for an appointment within the
23 time designated, we shall file your deposition
24 unsigned.

25 Very truly yours,

26
27 CALDERWOOD/MACKELPRANG & ASSOCIATES
28 Registered Professional Reporters

29 cc: C. Metcalf
30 B. Streelman
31 W. Phillips
32 Original Transcript
33 File

**UNION
CARBIDE**

UNION CARBIDE CORPORATION

METALS DIVISION,

URAVAN, COLORADO 81436

January 4, 1984

RECEIVED
JAN 30 1984

State Compensation Insurance Fund
950 Broadway
Denver, CO. 80203
Attn: Maudie Maldonado/Claims Adjustor

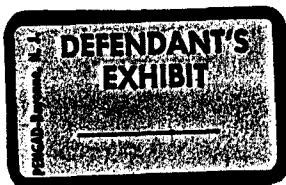
Re: SF:C8361751
WC: 3039102
December 7, 1983

Dear Maudie;

In reply to your December 7 letter, I will give you in so much as I know, the information concerning Mr. Colcord's employment while at the Uravan, CO. location working for Union Carbide Corporation.

John W. Colcord was hired as a labor on December 14, 1948, promoted to assistant storeskeeper on June 11, 1949, later promoted to storeskeeper on December 3, 1950. Mr. Colcord later transferred out of the warehouse on November 1, 1968 to the job position of sample bucker. The promotion to maintenance on August 29, 1969 was the final promotion and Mr. Colcord worked as a mechanic until the time of his death.

The only asbestos Mr. Colcord could have been exposed to, was during the period from June 11, 1949 through November 1, 1968 when he was working in the warehouse. Union Carbide was using some asbestos materials such as asbestos rope and asbestos insulation for pipes during this time. For a detailed description of his duties concerning Mr. Colcord's use of asbestos, I suggest you contact Mr. Wallace (Butch) Brice with Union Carbide Corp., at P.O. Box 787, Blanding, UT. 84511. Mr. Brice was John Colcord's supervisor during the period he worked in the warehouse.



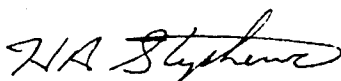
DIV. OF LABOR	VOC. REHAB.	CLMT
ATTORNEY	OTHER	

I CERTIFY THAT THIS REPORT HAS BEEN MAILED TO THE
ABOVE ON **JAN 28 1984** **JAN 24 1984**

I hope this information has been helpful. We regret that exposure records were not kept during the time period mentioned above.

If I can be of any further assistance, please feel free to contact me.

Very truly yours,



Howard A. Stephens
Safety Engineer

☒ DIV. OF LABOR	☒ OCC. REHAB.	☒ CLMT
☒ ATTORNEY	☒ OTHER	

I CERTIFY THAT THIS REPORT HAS BEEN MAILED TO THE
ABOVE ON **JAN 28 1984** **JAN 24 1984**



UNION CARBIDE CORPORATION
METALS DIVISION

October 26, 1983

American Motorists Insurance Company
Post Office Box 5347 I.A.
Denver, Colorado 80217

ATTN: Linda, Claims Adjuster

Dear Linda,

In response to your request to obtain Mr. Jack Colcord's work history and when U.C.C. began looking at asbestos as a health hazard, I give you the following information:

Jack Colcord was hired on December 14, 1948 as a Laborer; was promoted to Asst' Stores Keeper on June 11, 1949; he made Store Keeper on December 3, 1950; he transferred out of the Warehouse on November 1, 1968 and he worked as a Sample Buckler; then he went into Maintenance on August 29, 1969 and worked in Maintenance until the time of his death.

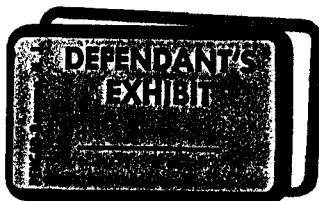
I am not certain when U.C.C. considered asbestos as a health hazard as I don't have the records to verify this but since my employment with U.C.C. in August 1976, asbestos was considered a hazardous material and we take precautions to avoid this material.

I hope this information is useful to you. If you need more information, please call me at my office in Uravan, Colorado.

Sincerely yours,

H. A. Stephens
Safety Engineer

HAS/mj



P. S. As of August 29, 1969, Mr. Colcord had no known exposure to asbestos or asbestos materials that we are aware of.