

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

HERMAN A. DENDINGER, et al.,	)	Case No. C 84-7854
	)	[Hon. Nicholas J. Walinski]
Plaintiffs,	)	
vs.	)	RESPONSE OF DEFENDANT THE
	)	GOODYEAR TIRE & RUBBER
	)	COMPANY TO PLAINTIFFS'
CHRYSLER PLASTIC PRODUCTS	)	REQUESTS FOR PRODUCTION
CORPORATION, et al.,	)	OF DOCUMENTS DIRECTED TO
	)	ALL DEFENDANT PVC
Defendants.	)	<u>MANUFACTURERS</u>

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Now comes defendant, The Goodyear Tire & Rubber Company, and for its response to plaintiffs' requests for production of documents states as follows:

1. All records of sales, direct or indirect, of Polyvinyl Chloride (PVC) resin from you to Chrysler Plastic Products Corporation (Chrysler) between January 1, 1967 and December 31, 1980.

ANSWER:

See sales reports attached as Attachment 1.

2. All documents indicating the extent to which PVC resin sales to Chrysler during the time period indicated above, represented sales of PVC resin manufactured in the: (a) suspension; (b) emulsion; (c) bulk; or, (d) solution process.

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ANSWER:

This is indicated by the product code numbers on the sales reports, see Attachment 1 and response to Interrogatory No. 8.

3. All documents indicating the extent to which PVC resin sales to Chrysler during the time period specified in request number 1, were of (a) Homopolymer; (b) copolymer; or, (c) terpolymer.

ANSWER:

This is indicated by the product code numbers on the sales reports, see Attachment 1 and response to Interrogatory No. 11.

4. All written documents indicating, with respect to PVC resin sold to Chrysler during the time period specified above, the size (in microns) of the resin sold.

ANSWER:

We have none.

5. All written documents indicating the results of any tests done on any PVC resin by you or any other entity to determine the concentration (in parts per million) of residual vinyl chloride monomer in PVC resin of the type sold to Chrysler during the time period specified in request number 1.

ANSWER:

See reports attached as Attachment 2.

6. All Material Safety Data Sheets published by you prior to January 1, 1986, relating to any PVC resin manufactured by you.

ANSWER:

Objection, any Material Safety Data Sheet published subsequent to 1980, the last date of exposure in this case, is irrelevant. Attached as Attachment 3.

7. All documents in your possession indicating the dates of manufacture and the dates of shipment of PVC resin sold to Chrysler.

ANSWER:

None other than the attached sales reports which show sales by product and by year, see Attachment 1.

8. All written results of any testing done on the PVC resin identified in the prior request to determine the concentration of residual vinyl chloride monomer.

ANSWER:

None now in existence except as indicated in 5 above, see Attachment 2.

9. All documents sent by you to the Occupational Safety & Health Administration, relating, in any way, to PVC.

ANSWER:

None to our knowledge.

10. All documents reporting or summarizing efforts taken by you, at any time since January 1, 1967 to reduce the

percentage of residual vinyl chloride monomer in PVC resin
manufactured by you.

ANSWER:

A search was made of company files but we were not able
to locate any such documents, see response to
Interrogatory No. 19.

11. Each and every document sent to Chrysler,
informing Chrysler of any known or potential human health hazard
relating to exposure or over exposure to vinyl chloride monomer.

ANSWER:

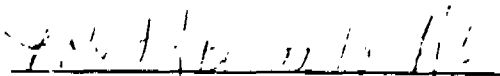
We believe that Chrysler was supplied with all or most
of the Material Safety Data Sheets attached hereto as
Attachment 3 and also received the customer letter
dated May 8, 1974, attached as Attachment 4.

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AS TO OBJECTIONS:

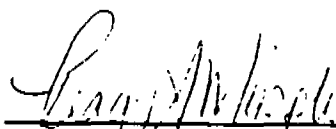
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Responses to Plaintiff's Requests for Production of Documents Directed to all Defendant PVC Manufacturers was mailed by United States mail, postage prepaid, to Kirk J. Delli Bovi, Esq., attorney for plaintiff, at his office located at Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio 44870, and to defense counsel as set forth in the attached Schedule of Service this 20th day of October, 1986.


An Attorney for Defendants
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Company, The BFGoodrich
Company, Firestone Tire &
Rubber Company, Conoco,
Inc., Uniroyal, Inc., Union
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