

- (c) Identify the statute, law, rule, ordinance, code or order to which the violation related;
- (d) State what, if any, specific fine, penalty, or sanction was imposed;
- (e) State the date in which and the manner in which said violation was corrected;
- (f) Identify any and all officials of Defendant, its predecessor or its related company having knowledge or notice of said violation and state the date on which said knowledge or notice was received; and,
- (g) Identify any and all documents referring to, relating to or reflecting said violation.

ANSWER:

See Answer to Interrogatory No. 120, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 122:

Has any federal or state government entity, at any time [between 1930 and 1980], conducted any inspection, test or survey concerning asbestos or asbestos exposure at any facility where the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, processed, applied, used or removed?

ANSWER:

See Answer to Interrogatory No. 120, which is incorporated herein as if fully rewritten. Defendant currently is aware of the following tests and surveys conducted in the 1980's: OSHA monitored employees' exposure through routine inspections; the Illinois EPA monitored the plant's environment through quarterly inspections; the U.S. EPA monitored the plant's environment through periodic inspections. See also Answers to Interrogatory Nos. 43, 47, 56 and 131, which are incorporated herein as if fully rewritten.