

Answer: Yes. (a) Defendant objects because this Interrogatory is not answerable in its present form since the amount of residual VCM in PVC is not a function of molecular weight.

18. Question: Do any of the "PVC products" release detectable amounts of VCM at room temperature (approx. 75°)?

a. If the answer is yes, please indicate which of the products.

Answer: Defendant objects to said Interrogatory because it is not answerable in its present form since any answer would vary depending upon the length of time PVC products have been in storage and the method employed to handle them. Also, see answer to Interrogatory No. 17.

19. Question: For each of the "PVC products" please indicate the temperature at which detectable amounts of VCM are released.

a. If they do, please indicate the amounts going back to at least 1965 and preparing an illustration of any variation in later years.

Answer: See answer to Interrogatory No. 18.

20. Question: To produce the various "PVC products" have you also carried out the polymerization reaction to produce the required PVC?

a. Have you ever purchased the PVC?

b. Please indicate dates when such purchasing started.

c. What percentage of total usage was purchased?

Answer: Yes. (a) No.

(b) Not applicable.

(c) Not applicable.