

NO. A-129,030

MARIE SELF, INDIVIDUALLY AND AS	X	IN THE DISTRICT COURT OF
PERSONAL REPRESENTATIVE OF THE	X	
ESTATE OF JAMES FLOYD SELF,	X	
DECEASED	X	
	X	
VS.	X	JEFFERSON COUNTY, TEXAS
	X	
TEXACO REFINING & MARKETING,	X	
INC., ET AL	X	58TH JUDICIAL DISTRICT

OBJECTIONS OF DEFENDANT THE B.F.GOODRICH COMPANY
TO PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR PRODUCTION
AND MOTION FOR PROTECTION

TO: Plaintiff Marie Self, by and through her attorneys of record,
Gerald W. Eddins Esq. and Martin D. Barrie, Esq., UMPHREY,
SWEARINGEN, EDDINS & CARVER, P.O. Box 3837, Port Arthur, TX
77643.

COMES NOW DEFENDANT The B.F.Goodrich Company and, pursuant to
Texas Rules of Civil Procedure, files its' Responses to Plaintiff's
Interrogatories and Requests for Production.

OBJECTIONS TO DEFINITIONS

Defendant The B.F.Goodrich Company objects to the definition
"PRODUCT" on the basis that it is vague and ambiguous and as stated
would make the effort required to respond to an Interrogatory and
Request for Production using this term onerous and burdensome since
there is no lower limit to the amount of benzene contained in the
materials for which Plaintiff is seeking these admissions. Benzene is
endogenous to petroleum hydrocarbons and as such can be found as a
minor contaminant in many petroleum products. Such an unrestricted
inquiry is so broad as to be meaningless and as such Defendant The
B.F.Goodrich Company would be unable to respond. All responses to the

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following Interrogatories and Requests for Production will be made with the term "PRODUCT" referring to the chemical benzene, unless otherwise indicated.

Defendant The B.F.Goodrich Company objects to the definitions "YOU", "YOUR", "YOUR COMPANY", or "DEFENDANT", contained in Plaintiff's Interrogatories and Requests for Production because it attempts to impose on this Defendant a definition which is beyond the bounds of discovery contemplated by the Texas Rules of Civil Procedure and by its very term, seeks to inquire into matters which are privileged and/or attorney work product, and thus protected from discovery. Subject to this objection responses to Plaintiff's Interrogatories and Requests for Production will be those of Defendant, The B.F.Goodrich Company.

Defendant The B.F.Goodrich Company objects to the definitions "DATE", and "OCCURRENCE" contained in Plaintiff's Interrogatories and Requests for Production because they presume there has in fact been an occurrence or incident. Furthermore, in the context of an alleged occupational illness, such as Multiple Myeloma, with alleged exposures to unidentified products over a period of twenty six (26) years, the terms are meaningless as defined, providing no aid to this Defendant in ascertaining what information is sought.

Defendant The B.F.Goodrich Company objects to the definition "PLAINTIFF(S)" contained in Plaintiff's Interrogatories and Requests for Production on the basis that it is surplusage and redundant unless it is intended to include someone other than named Plaintiff in the instant case, in which case it is improper. There are no "above named

Plaintiffs" in the set of definitions. For the purposes of responding to Plaintiff's Interrogatories and Requests for Production Defendant The B.F.Goodrich Company will respond on the basis that Plaintiffs refers to Marie Self, or if indicated by context, Plaintiff's decedent.

Defendant The B.F.Goodrich Company objects to Definition "DOCUMENT", contained in Plaintiff's Interrogatories or Requests for Production as being overbroad, overreaching, and beyond that which would be contemplated by the Texas Rules of Civil Procedure. To allow a definition as broad and far reaching as Plaintiff attempts by this definition would make every inquiry which involved any document overly oppressive and burdensome.

Defendant The B.F.Goodrich Company objects to the Definition "DISEASE", on the basis that it conflicts with the allegations that Plaintiff has made in her pleadings to the effect that the Decedent was afflicted with Multiple Myeloma. Acute Myelogenous Leukemia, AML, is a disease condition that is distinguishable from Multiple Myeloma, and by defining the disease condition as AML Plaintiffs make the information sought irrelevant and confuse the issues involved in the present suit. All responses of Defendant The B.F.Goodrich Company will be made in harmony with the allegations advanced in Plaintiff's Original Petition that the disease decedent suffered from was Multiple Myeloma.

SPECIFIC OBJECTIONS

INTERROGATORY NO. 1: Please identify yourself, giving your full name, residence, business address and occupation, and if the defendant is a

INTERROGATORY NO. 1: Please identify yourself, giving your full name, residence, business address and occupation, and if the defendant is a corporation, please state the position and office you hold with the defendant.

RESPONSE: The B.F. Goodrich Company,
Objections stated are by counsel, identified herein. At this time, Defendant does not know what individual or individuals will ultimately make the answers, it cannot provide or further answer, but will do so when answers are signed.

INTERROGATORY NO. 2: Please state the full name and last known address, giving the street, street number, city and state, of every witness or person known to, or employed by the defendant or its attorneys who has knowledge regarding any facts or circumstances surrounding the allegations made the basis of this lawsuit; including, but not limited to, eyewitnesses, supervisors of the plaintiff, medical witnesses, co-workers of the plaintiff, fellow employees of the plaintiff, and any other persons having any knowledge thereof.

RESPONSE: Defendant objects to this interrogatory on the basis that it is overbroad and exceeds the requirements imposed under Rule 166b of the Texas Rules of Civil Procedure, to disclose the identity and location of persons having knowledge of relevant facts. Defendant further objects on the basis that this interrogatory is vague due to the general and vague allegations contained in Plaintiff's pleadings. At such time as discovery enables Defendant to glean sufficient knowledge to provide the identity of witnesses it knows to possess relevant knowledge, subject to the Court's ruling on the objections, it will identify such persons.

INTERROGATORY NO. 3: Who was the person(s) in this defendant's employ during the years 1960 through 1986 most knowledgeable about each of the following (please give their names, addresses, job title, length of employment by this defendant, and state whether they are currently employed by this defendant):

a. the actual and/or potential health hazards associated with the products made the basis of this lawsuit;

RESPONSE: Defendant objects to this interrogatory on the basis that it is vague. Defendant is unable to determine what "products made the basis of this lawsuit" refers to, beyond the chemical benzene. As to benzene Defendant is accumulating the information requested and will respond.

potential, alleged, or actual health hazards or dangers associated with any of the products or equipment made the basis of this lawsuit, please state:

- a. the date the Defendant or agent or employee of the Defendant first learned of or recognized the potential, alleged, or actual health hazards or dangers;

RESPONSE: Defendant objects to this interrogatory on the basis that it is vague in that the term products, as defined by Plaintiff, fails to identify what specific materials, other than benzene, to which Plaintiff alleges to be the basis of this suit. Defendant further objects to this interrogatory on the basis that the inquiry directed at "health hazards or dangers" is overbroad and inquires into matters which have no possible relevance to this suit. Defendant further objects to this interrogatory on the basis that it is overbroad and burdensome to require this Defendant to determine what each agent or employee of the Defendant knew at any point in the past, concerning this lawsuit. This Defendant has thousands of employees at present, and when extended back over 26 years the number would grow to hundreds of thousands, and as such it would be burdensome and harass to require response to this request as drafted. Subject to this objection and in accord with Texas procedure, Defendant is seeking information which will allow it to answer.

- b. what actions, if any, the defendant took to remedy or remove the health hazards or dangers, or to warn any potential user or purchaser of the hazards or dangers;

RESPONSE: Defendant objects to this interrogatory on the basis that it is irrelevant what actions the defendant may have taken with regard to users or purchasers, since the plaintiff's Decedent has been characterized in Plaintiff's pleadings as a contractor employee. Defendant further objects to this interrogatory in that the inquiry should be limited to the alleged illness which plaintiff claims to be related to benzene exposure, that being multiple myeloma, and not expanded to include any and all health hazards or dangers associated with the undefined products.

- c. when any of the actions described in (b) were commenced.

RESPONSE: Defendant will answer this interrogatory when it answers (b).

INTERROGATORY NO. 5: If the defendant ever contacted, consulted, or demonstrated to or with the plaintiff regarding the uses and/or safety

and/or health considerations associated with the products made the basis of this lawsuit, please state:

- a. the name and address of all persons making such contact on behalf of the defendant;
- b. the date in which these contacts occurred;

RESPONSE: Defendant objects to this interrogatory on the basis that the term "products" is vague and ambiguous and potentially embraces thousands of materials containing minuscule amounts of benzene. To the extent that this interrogatory inquires into benzene, Defendant will attempt to respond if plaintiff can provide information relating to the plaintiff's Decedent's employer, the date of his activity in our plant site, the specific plant site, and the unit or units where the plaintiff's Decedent may have worked. Until this information is available and furnished to Defendant, Defendant has no way it can attempt to gather information to answer this interrogatory.

INTERROGATORY NO. 6: If the defendant distributed any pamphlets, labels, instruction booklets, brochures, manuals, material safety data sheets, or any other printed matter to the plaintiff with or in conjunction with the sale of the products made the basis of this lawsuit warning of any known or potential dangers or health hazards associated with the use of exposures to the products made the basis of this lawsuit, please state:

- a. the date each item, document, or thing was disseminated;
- b. the name and address of the person, firm, or organizations having the responsibility for researching and/or creating and/or developing such documents.

RESPONSE: Defendant objects to this interrogatory on the basis that it seeks information totally irrelevant to the present suit. Plaintiff has not alleged sales of our products which resulted in exposure to the plaintiff's Decedent. Subject to this objection, Defendant says that Plaintiff alleges no sale to Plaintiff's decedent and Defendant is aware of none. Thus it gave no information in connection with a sale.

REQUEST FOR PRODUCTION NO. 1: If the answer to the above interrogatory is in the affirmative, please produce a copy of any and all pamphlets, labels, instruction booklets, brochures, manuals, material safety data sheets, or any other printed matter.

RESPONSE: None required.

INTERROGATORY NO 7: Please state the name and address of any and all expert witnesses who you intend to use at the trial of this matter, and state the subject matter on which they are expected to testify, the substance of their testimony, and the technical field in which you claim they are an expert.

RESPONSE: Defendant has not yet selected such witnesses. This interrogatory will be answered at the appropriate time after expert witnesses are decided upon. Responsive to Interrogatory No. 1, this information will be within the knowledge of counsel, who will answer this interrogatory.

REQUEST FOR PRODUCTION NO. 2: For each of the persons listed above, please produce a copy of each of the named experts' reports.

RESPONSE: There are none at this time.

REQUEST FOR PRODUCTION NO. 3: For each of the persons listed above, please produce a copy of each of the named expert's current curriculum vitae.

RESPONSE: There are none at this time.

INTERROGATORY NO. 8: If the Defendant contends that the Plaintiff was not exposed to or did not use the products or equipment made the basis of this lawsuit as the plaintiff has alleged, please state:

- a. the name, address and title or occupation of all persons having knowledge of the facts relevant to this interrogatory.

RESPONSE: Defendant objects to this interrogatory on the basis that the phrase "products or equipment made the basis of this lawsuit" is vague and ambiguous. Defendant is unable to determine what specific products plaintiff believes to have been involved in this action. Defendant further objects on the basis of vagueness since the plaintiff's allegations fail to identify the specific equipment that may have been involved in this lawsuit. Subject to these objections the Defendant at this time does not have information upon which it could base an answer to this interrogatory, but is investigating.

INTERROGATORY NO. 9: If the defendant ever provided to or recommended to the users and/or purchasers and/or plaintiff of the products made

the basis of this lawsuit protective clothing and/or equipment, the purpose of which being to reduce and/or eliminate the actual, potential or alleged harmful effects of the products, please state:

- a. the date(s) provided;
- b. the nature of the item provided (i.e., clothing, equipment, brochures, material safety data sheets, etc.)
- c. the name, address, and title or occupation of the person(s) most knowledgeable of the facts relevant to this interrogatory.

OBJECTIONS: Defendant objects to this interrogatory on the basis that it is irrelevant what may have been provided or recommended to users and/or purchasers in the context of this suit. Plaintiff is alleging that her Decedent was a carpenter employed by contractors who may have worked in our facilities. Defendant further objects to this interrogatory as vague on the basis that it is unable to determine what the plaintiff is referring to with the phrase "products made the basis of this lawsuit," other than the chemical benzene. Defendant also objects to section C of this interrogatory on the basis that it is unintelligible as drafted and therefore vague and ambiguous. Subject to it's objections, Defendant says it does not have information upon which it can answer, but is investigating. (See response to No. 5 "b").

REQUEST FOR PRODUCTION NO. 4 : If the answer to the above interrogatory is in the affirmative, please produce any and all documents in answer to that interrogatory.

RESPONSE: When Defendant has the information necessary to be able to answer interrogatory No. 9, subject to objections, it will provide this information.

INTERROGATORY NO. 10: Do you claim that the incident(s) made the basis of this lawsuit is covered in whole or in part by any contract of insurance.

RESPONSE: Investigation is being done with regard to this interrogatory, and answer will be furnished.

REQUEST FOR PRODUCTION NO. 5: If your response to the preceding interrogatory is in the affirmative, please produce all insurance policies, contracts and/or agreements, including but not limited to, primary and excess coverage, and all letters of notice given to any

insurance company which in any way involves this incident and/or lawsuit.

RESPONSE: Defendant objects to this request for production on the basis that plaintiff, in seeking the letters of notice given to any insurance company, is obviously attempting to obtain material privileged in nature, and as such exempt from discovery. To the extent insurance agreements or policies are sought they will be made available when they can be identified by Defendant.

REQUEST FOR PRODUCTION NO. 6 : Please produce any and all material safety data sheets or other health and/or safety information in the possession of this defendant concerning the product or equipment made the basis of lawsuit that was manufactured and/or sold and/or used and/or distributed by this defendant during the years 1960 - 1986.

RESPONSE: Defendant objects to this request for production on the basis that the phrase "products or equipment made the basis of this lawsuit" is vague and ambiguous. Defendant is unable to determine what specific products plaintiff believes to have been involved in this action. When discovery is complete enough to determine what products are involved, Defendant will attempt to locate and produce the information sought in accord with Texas rules.

REQUEST FOR PRODUCTION NO. 7: If the defendant's answer to be above request for admission is in the negative, please produce any and all results and/or reports of such tests.

RESPONSE: Defendant objects to this request for production on the basis that it seeks information totally irrelevant to the present suit. Potential health hazards should be limited to only multiple myeloma, the condition which plaintiff's decedent is alleged to have suffered. Defendant further objects to this request on the basis that it is onerous and burdensome to attempt to provide the materials sought using the definition of products contained in this set of discovery. Plaintiff has defined products in such a manner that nearly any petroleum based material would be included. To the extent that this request for production is referring to benzene and multiple myeloma, the responsive tests, analysis, and research will be collected and provided to plaintiff as soon as they are available.

INTERROGATORY NO. 11: If the above Request for Admission No. 6 is denied, please state the person(s) and address(s) in the defendant's employ, or retire, most knowledgeable about said tests.

RESPONSE: None required.

INTERROGATORY NO. 12 : If the defendant alleges that there is another causative agent or agents that caused or contributed to the injuries complained of by the plaintiff, please state:

- a. the name or names of the agents or substances;
- b. the facts and circumstances surrounding plaintiff's exposure to or use of this agent.
- c. the name, address and title or occupation of any and all persons having knowledge of the facts relative to this interrogatory.

RESPONSE: When Defendant has sufficient information to determine whether it will assert such allegations, it will answer this interrogatory.

REQUEST FOR PRODUCTION NO. 8: Any and all documents, memorandum, field survey reports, industrial hygiene survey reports, safety reports or inspections, either made by the defendant or by one at the defendant's request at the Plaintiff's place of employment and/or work to evaluate the potential of alleged dangers or health hazards associated with exposure to the product(s) made the basis of this lawsuit.

RESPONSE: Defendant objects to this request for production on the basis that it is irrelevant what dangers or health hazards, associated with unnamed products other than the risk of developing multiple myeloma. Defendant further objects to this request on the basis that "products made the basis of this lawsuit" is vague and ambiguous and could potentially embrace any/or all petroleum hydrocarbon mixtures. To the extent that this request applies to this Defendant's facilities and the risk of incurring multiple myeloma from exposure to the chemical benzene, we will supply the information requested, relative to locations where Plaintiff's decedent will be able to show evidence of exposure.

INTERROGATORY NO. 13: If the defendant's answer to the above request for admission is in the negative, please state:

- a. when the defendant or agent or employee of the defen-

dant first told the plaintiff of the potential, alleged, or actual health hazards or dangers;

- b. the name and address of the person or employee of the defendant informing the plaintiff of the potential, alleged, or actual health hazard or dangers;
- c. what actions, if necessary, the defendant took to remove and/or eliminate the health hazards or dangers or to warn any employee or worker of the hazards or dangers.

RESPONSE: Defendant objects to this interrogatory on the basis that the phrase "products made the basis of this suit," as contained in request for admission number 10, is vague and ambiguous and could potentially be interpreted to apply to thousands of materials containing minuscule quantities of benzene. Benzene is a naturally occurring chemical found in a wide variety of materials including petroleum hydrocarbons. Defendant further objects to this interrogatory on the basis that the "health hazards or dangers," referred to in request for admission number 10, is overbroad and includes information which would have no relevance to the present action. Plaintiff is alleged to have suffered from multiple myeloma and therefore any hazard or danger outside of the risk of developing multiple myeloma would be irrelevant. Subject to its objections, when Defendant is able to determine the necessary facts to be able to answer this interrogatory, it will do so.

INTERROGATORY NO. 14: Please list each of the following for the date of the injury made the basis of this lawsuit:

- a. the name and address of the plant manager of the defendant's facility during the years 1960 - 1986;
- b. the name and address of the safety supervisor(s) for the defendants facility during the years 1960 - 1986;

RESPONSE: Defendant objects to this interrogatory on the basis that the phrase "date of the injury" presumes that the plaintiff has in fact incurred an injury, and is vague and ambiguous as applied to the context of an alleged occupational injury induced over an alleged exposure period of 26 years. Subject to its objection, Defendant is accumulating the information sought and will provide it.

INTERROGATORY NO. 15: If the defendant ever set up or established a medical and/or industrial hygiene and/or safety program to identify, evaluate and/or control employee and/or worker exposures to the products made the basis of this lawsuit that were manufactured and/or sold and/or used by the defendant, please state:

- a. the name, address and title of the person(s) responsible for the operation of the program during the years 1960 - 1986.

RESPONSE: Defendant objects to this interrogatory on the basis that it is vague and ambiguous and that the terms "products made the basis of this lawsuit" potentially embraces thousands of petroleum hydrocarbon mixtures containing minute quantities of benzene. To the extent that this interrogatory is interpreted to apply only to benzene, defendant is investigating and will answer.

INTERROGATORY NO. 16: If the defendant ever provided warning signs throughout its facility during the years 1960 - 1986 warning its employees and/or other workers at its facility of the actual or potential health hazards associated with the product made the basis of this lawsuit, please state the following:

- a. the date said warning signs were first used;
- b. the date(s) any changes or modifications were made to the language of the warnings;
- c. an itemized list of the unit(s) within the defendant's plant facility, by name and unit purpose, that the warning signs were placed at and give the year said warning signs were first placed at said unit(s).
- d. the name, address, and title or occupation of the person(s) responsible for the wording and language used on the warning signs; whether said person(s) were retired or employed by the defendant.

RESPONSE: Defendant objects to this interrogatory on the basis that it is overbroad and would require an extensive effort of the Defendant to determine the wording of every sign in its refinery over a 26 year period. Defendant will attempt to respond as regards benzene, limited to the areas where the plaintiff worked in our facilities, when this information can be determined.

REQUEST FOR PRODUCTION NO. 9: If the answer to the above interrogatory is in the affirmative, please produce any and all documents that reflect, relate or pertain to the change or

modifications made; whether such changes or modifications were implemented by the defendant at its facility or not.

RESPONSE: Defendant is seeking to accumulate this information and will make it available.

REQUEST FOR PRODUCTION NO. 10: Please produce any and all warning signs, or an exact, verbatim description of the language used in said warnings, used by the defendant at its facilities during the years 1960-1986.

RESPONSE: Defendant objects to this request for production on the basis that it is overbroad, and seeks information irrelevant to the present action. Defendant has warning signs at its facilities for a wide variety of hazards including such things as bends in roads or high noise areas. Subject to the Court's ruling on relevant objections and Defendant's Motion for Protection, we will produce what can be found.

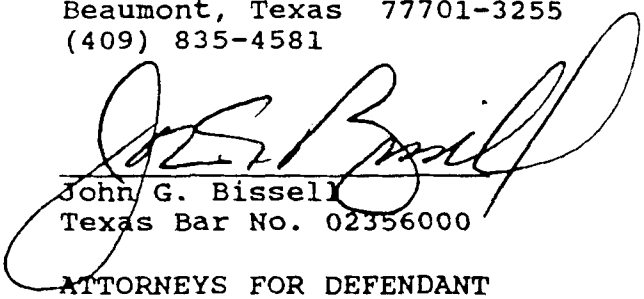
INTERROGATORY NO. 17: If benzene was manufactured at the defendant's facility, or exists at specific units in the defendant's facility during 1960-1986, please state the following:

- a. the names of the units manufacturing the benzene or units where benzene is reasonably expected to be found.

RESPONSE: Defendant objects to this interrogatory on the basis that the inquiry of "units where benzene is reasonably expected to be found" is overbroad and burdensome in that there is no lower limit to the amount of benzene specified in the inquiry.

Respectfully submitted,

STRONG, PIPKIN, NELSON & BISSELL
14th Floor, San Jacinto Building
595 Orleans Street
Beaumont, Texas 77701-3255
(409) 835-4581



John G. Bissell
Texas Bar No. 02356000

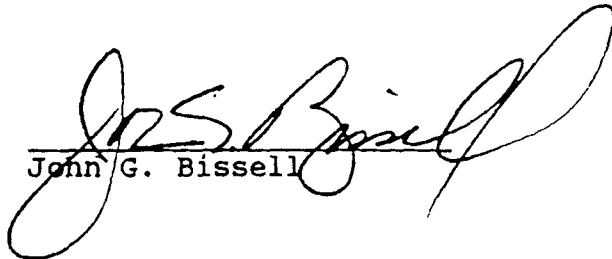
ATTORNEYS FOR DEFENDANT
The B.F. Goodrich Company

NOTICE OF HEARING

The objections contained in the foregoing Response will be heard at 8:30 a.m. on Wednesday, November 2, 1988, in the 60th District Court of Jefferson County, Texas.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Responses of The B.F. Goodrich Company to Plaintiff's Interrogatories and Requests for Production has been furnished to Gerald W. Eddins, Esq. and Martin D. Barrie, Esq., counsel for plaintiff's, by certified mail, return receipt requested, and to all other counsel of record by regular U.S. Mail, on this 30 day of Sept, 1988.


John G. Bissell

November 1, 1988

H. W. Dietz

ACTIVITIES REPORT FOR OCTOBER, 1988

1. Geons

The National Sanitation Foundation (NSF) issued a draft report "Comparative Evaluation of Plastic Products under NSF Standards 14 and 61." The study was undertaken to compare the toxicology requirements and testing results under NSF Std. 14 "Plastic Piping Components and Related Materials" with those in NSF Std. 61 "Drinking Water System Components--Health Effects." Coverage under the two standards overlaps with respect to materials requirements for potable water contact. Samples of PVC and CPVC pipe and fittings were included. In general, it was found that products that were acceptable under Std. 14 would be acceptable under Std. 61. While there were some troublesome statements, one in particular was cause for concern. It was implied that mutagenicity data would be required on extracts of the products to comply with Std. 61. If this were true, it would entail considerable unnecessary expense for each product. Such was never the intent of the Health Effects Committee which established the toxicity requirements for Std. 61.

In order to set the record straight, I attended the Industry Forum and NSF Std. 14 Joint Committee meetings. In discussions with NSF staff and during the meetings, it was made clear that only in the event of a lack of identity or nonpredictable migrating species and/or lack of mutagenicity data for migrants would mutagenicity tests be required on total extractants. Furthermore, for those products containing essentially the same ingredients, information could be used for a class of products.

Dr. McClelland felt this was a major clarification. She had been under the impression that mutagenicity tests on product extracts were to somehow test the synergism of the migrants.

It was the consensus of the Industry Forum and the Std. 14 Joint Committee that Std. 14 be revised to include reference to Std. 61 for health effects evaluation with a minimum 2-year phase-in period for products currently listed under Std. 14.

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As a result of reviews of a couple of Geon compounds, which reversed the claimed FDA status of both, I have been receiving many more requests for review of Geon compounds. I have reviewed nine Geon compounds with requests to review an additional 14 compositions.

2. Estanes

Ortho Pharmaceuticals, Canada, is progressing on the use of Estane polyurethane polymers in the fabrication of condoms. Ortho holds a patent on the manufacture of condoms from polyurethanes which was not pursued for several years. Due to increased demand, they are pursuing this patent.

I participated in a meeting with representatives from the Estane Group, Ortho Pharmaceutical, and the University of Windsor in Toronto. We had an excellent comprehensive review of the project by all three parties. Dr. Ilse, Ortho, and I reviewed the toxicological concerns to be addressed to assure ourselves and regulatory agencies of the safety of the end product. Ortho will perform the toxicological evaluation and testing of the final polyurethane composition when established.

Mary Conrardy, Wisconsin Pharmacal, consulted with me regarding additional testing requested by FDA on their "female" condom. I also supplied her with published reports regarding long term implantation of polyurethanes and lack of extractable MDA from polyurethanes except at highly elevated temperatures.

3. No Foul

Ms. Cool, EPA special review manager for organotins, informed me verbally that we would be granted an exemption from the release testing requirements of the Organotin Antifouling Paint Control Act of 1988. She requested copies of the current NoFoul label, MSDS, product bulletins, and amount manufactured in 1988.

Copies of the latest product bulletins, particularly the Technical Background bulletin, are outdated and/or obsolete. They describe various application including pleasure craft, water intakes, pilings, etc. in addition to sonar domes.

These are being submitted with a strong caveat that they were outdated and that marketing attempts except for sonar dome use have been abandoned. Projected 1988 production, label and MSDS will also be submitted as requested.

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4. Hydrophilics

A Federal Register notice permitting the use of Carbopol 1342 as an inert ingredient in pesticide formulations has not been published as yet. However, Monsanto which wishes to use C-1342 in No-Mix and has been in contact with EPA, has ordered an initial 10 lbs. of C-1342 for evaluation trials.

The Cosmetic, Toiletry and Fragrance Association has finally issued an adopted name for Carbopol 1342. The official CTFA adopted name is "Acrylates/C10-30 Alkyl ACrylate Crosspolymer." This name can be used for cosmetic labeling. Carbomer 1342 N.F. could also be used for such labeling.

Since the NF has finally published the carbomer monographs, requests have been received for similar monographs in the British Pharmacopeia. A BP monograph for Carbomer 934, 934-P already exists, but is somewhat different than the USP-NF monograph. I have written to the British Pharmacopeial Commission requesting information regarding the establishment of monographs for those Carbomers recently published by USP-NF.

5. RJF International

Some problems related to acceptance of current RJF (formerly BFG) products have arisen with the sale of the Fabricated Polymers Division.

KoroKlear Vinyl Strip and Sheet has had USDA acceptance for hanging refrigerator doors. I have informed USDA of the sale of this product and requested that they supply an acceptance letter to C. Schmidt, RJF.

KoroKlear Vinyl Strip and Sheet has been under NSF Standard 51 "Food Service Equipment." I have informed NSF of the ownership change and instructed them to contact Ms. Schmidt for further listing.

Since the sale of the former Salem plant, I have completed numerous NSF submissions for Jeans' Extrusions for the Marietta products they have purchased. This last month I received requests from Jeans' Extrusions for submission of three Marietta vinyl compounds to NSF. To help ease the transition and since Marietta purchases the PVC resin from the Geon Division, I have continued this service. I have informed Ms. Schmidt that unless other arrangements are established, I will not be able to continue this service.

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I have sent copies of all such current NSF submissions to her and to Marietta to serve as examples.

W. C. Bachtel

W. C. Bachtel

jp 811-3

cc: R. K. Hinderer
C. N. Dillon

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