

the grounds that it is overly broad. Subject to its objections, Union Carbide responds as follows:

Calidria is not an "asbestos-containing product." Calidria is a unique short-fiber chrysotile asbestos uncontaminated by tremolite which Union Carbide extracted from an asbestos ore body in the New Idria area of San Benito County in California. Calidria was marketed and sold by Union Carbide or by Calidria distributors to manufacturers or producers who incorporated and used Calidria in their products or production processes. From 1963 to 1985, Union Carbide sold Calidria asbestos fiber to various third party manufacturers or distributors. The asbestos third party manufacturers to whom Union Carbide sold Calidria used it in manufacturing various products used in commercial applications. Union Carbide did not manufacture those products and had no control over the nature of the products in which the fiber was used.

Union Carbide produced four basic grades of Calidria asbestos: standard, super standard, high purity, and resin grade; the different grades reflect varying degrees of purity of content. Certain grades were sold in pelletized form, certain grades in fibrous form, and certain grades in both forms. In appearance, Calidria is light gray (pelletized) or white (fibrous) in color and powdery in substance. The following is a representative listing and description of the various brands of Calidria produced and marketed by Union Carbide:

<u>PRODUCT SYMBOL</u>	<u>PRODUCT CODE</u>	<u>DESCRIPTION</u>
HPO	651001	High Purity, Open Fiber
HPO-C	651101	High Purity, Open Fiber
HPP	651601	High Purity, Pellets
HPP-JAP	651701	High Purity, Pellets, 4-Ply bags
RG-110	652101	Resin-Grade, Open Fiber 15% +325
RG-110-D	652201	Resin-Grade, Open Fiber, 15% +325
RG-144	652501	Resin-Grade, Open Fiber
A- 14	652801	Resin-Grade, Open Fiber
RG-244	653001	Resin-Grade, Open Fiber
RG - 444-0	653301	Resin-Grade, Open Fiber, 10% Stearic Acid
A-28	653601	Resin-Grade, Open Fiber, Silica Treated
SG-100	654001	Standard Grade, Pellets
SG-102	654201	Standard Grade, Pellets, 100-lb. bags
SG-130	654501	Standard Grade, Open Fiber, 30% +325
SG-144	654801	Standard Grade, Open Fiber, 45% +325
SG-200	655001	Super Standard Grade, Pellets
SG-210	655301	Super Standard Grade, Open Fiber, 15% +325
SG-444-0	655501	Standard Grade, Open Fiber, 5% Stearic, Hydrophobic
T-135-0	656001	High Purity, Open Fiber, Titanated, 3 5%, Anatase
T-135-P	656301	High Purity, Pellets, Titanated, 35%, Anatase
CG-100	656601	Coatings Grade, Pellets
CG-135-0	656801	Coatings Grade, Open Fiber, Titanated 35%, Rutile