

ANSWER TO INTERROGATORY NO. 29: Abex has never manufactured, sold or distributed any thermal insulation products.

30. If your answer to question 28 is in the affirmative, please explain whether the Threshold Limit Value is based on counts of all particles in the air or just the asbestos fibers in the air.

ANSWER TO INTERROGATORY NO. 30: See answer to interrogatory No. 28.

31. When did defendant know that any governmental or private agency, or other entity, issued guidelines suggesting Threshold Limit Values for exposure to asbestos dust? If ever:

- (a) Identify the agency or entity issuing the guideline;
- (b) State the content of the guideline(s) verbatim;
- (c) State the date issued and the date you first knew the purpose of the guideline(s).

ANSWER TO INTERROGATORY NO. 31: Abex objects to this interrogatory on the grounds that it is overly broad, assumes facts not established and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex is presently unaware of when it first received information concerning Threshold Limit Values.

32. Does the defendant contend that the asbestos products mined, manufactured, produced, processed, compounded, converted, sold, merchandised, supplied, distributed and/or otherwise place in the stream of commerce by the defendant are not "hazardous substances," as defined in 15 U.S. Code, § 1261 (5)? Said definition is incorporated herein by reference, and defendant is required to reply as to all the parts of said definition. If so, state the facts, opinions or conclusions upon which defendant relies to support such contention, and identify each document which is applicable.