

NEW EVIDENCE

EXHIBIT C

AFFIDAVITS OF FOUR FORMER EMPLOYEES OF MATHIESON CHEMICAL

This is new evidence in the sense that these affidavits were also submitted to the Hearing Representative on September 1, 2004, but I was not told that these were ever considered. These gentlemen were all long-time employees at Mathieson Chemical Company and each one stated that he did not know about the presence of uranium or its hazardous waste products in the plant. Each also stated that no safety precautions were taken, no warning signs were posted, no monitoring was done, no monitoring devices were worn, and he did not know that he or anyone else was in danger of exposure to hazardous materials. These affidavits were made in August 2004. Three of these gentlemen have died of cancer.

Four Affidavits attached.

August 7, 2004

I was an employee of Mathieson Chemical Company/Olin Corporation in Pasadena, Texas from 1950 until 1980.

My job classifications during this period were

I have been told that, in the early 1950's, uranium was present in this Mathieson Chemical Company/Olin Corporation plant. I did not know about the presence of uranium or its hazardous waste products.

No safety precautions were taken, no warning signs were posted, no monitoring was done, no monitoring devices were worn, and I did not know that I, or anyone else, was in danger of exposure to hazardous materials.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 7 day of August, 2004.



Atrius M. Clay
NOTARY PUBLIC

August 7, 2004

I was an employee of Mathieson Chemical Company/Olin Corporation in Pasadena, Texas from February 1950 until May 1950 when I was laid off. I went back to work there in August 1950 and worked there until September 1990.

My job classifications during this period were

I have been told that, in the early 1950's, uranium was present in this Mathieson Chemical Company/Olin Corporation plant. I did not know about the presence of uranium or its hazardous waste products.

No safety precautions were taken, no warning signs were posted, no monitoring was done, no monitoring devices were worn, and I did not know that I, or anyone else, was in danger of exposure to hazardous materials.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 7 day of August 2004.

Atreus M. Clay
NOTARY PUBLIC



August 7, 2004

I was an employee of Mathieson Chemical Company/Olin Corporation in Pasadena, Texas from 1945 until 1977.

My job classifications during this period were _____, and then the last few years, I went back to work in the _____ due to a reduction in force.

I have been told that, in the early 1950's, uranium was present in this Mathieson Chemical Company/Olin Corporation plant. I did not know about the presence of uranium or its hazardous waste products.

No safety precautions were taken, no warning signs were posted, no monitoring was done, no monitoring devices were worn, and I did not know that I, or anyone else, was in danger of exposure to hazardous materials.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 7 day of August, 2004.

Atreus M. Clay
NOTARY PUBLIC



August 13, 2004

I was an employee of Mathieson Chemical Company/Olin Corporation in Pasadena, Texas from 1952 until 1994.

My job classifications during this period were

I have been told that, in the early 1950's, uranium was present in this Mathieson Chemical Company/Olin Corporation plant. I did not know about the presence of uranium or its hazardous waste products.

No safety precautions were taken, no warning signs were posted, no monitoring was done, no monitoring devices were worn, and I did not know that I, or anyone else, was in danger of exposure to hazardous materials.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 13 day of August 2004.

Atreus M. Clay
NOTARY PUBLIC

