

FILE NAME: Warning Labels (WL)

DATE: 1983

DOC#: WL005

DOCUMENT DESCRIPTION: Legal - Objections of Defendant Fibreboard to Plaintiffs' Interrogatories

Warning
Labeling

posit on Q68 & App A

IN THE UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF TEXAS
IN RE ASBESTOSIS CASES

OBJECTIONS OF THE DEFENDANT
FIBREBOARD CORPORATION TO THE
PLAINTIFF'S INTERROGATORIES

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the Defendant, Fibreboard Corporation, in response to interrogatories propounded under Rule 33, Federal Rules of Civil Procedure, served on Defendant's counsel, and files this its objections to certain interrogatories. Such objection to each interrogatory bears the same number as the numbered interrogatories:

20. Based upon the material contents of your products, the method of manufacturing, of the method of application for the purpose of insulation, can your products be generally applied by an insulator without liberating asbestos fibers?
- (a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name.
 - (b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

OBJECTION TO INTERROGATORY NO. 20:

Defendant objects to Interrogatory No. 20 because the question is vague, ambiguous, unclear and misleading in that it talks about "liberating asbestos fibres" without defining the quantities, if millions of fibres were released every second the product was applied or if one fibre was released during a year of application work, and the answer would be misleading and prejudicial without an involved explanation.

21. Was it a foreseeable use of your asbestos-containing insulation products that they may have to be removed, stripped or replaced at any time after installation; If your company contends the plaintiff(s) misused any of your products then state how and under what circumstances your product was misused.

OBJECTION TO INTERROGATORY NO. 21:

21(a) Defendant objects because this is a compound interrogatory, containing two separate, distinct and unrelated questions.

21(b) Defendant objects to the first question, "was it foreseeable," because the question is too vague, indefinite, ambiguous and unclear - foreseeable to whom?; foreseeable when?; foreseeable under what conditions?

Further, the foreseeability relates to whether or not products "may have to be removed, stripped," etc. This would require pure guess, speculation, conjecture and cannot be answered under oath.

21(c) Defendant objects to the second part of the interrogatory as a plaintiff's "misuse" would depend upon the circumstances of each case and cannot be answered generally. Examples of misuse are continuing to work with asbestos products without use of respirators, and without exhaust fans after warning.

22. Prior to releasing the products listed in Interrogatory No. 6 to the public for sale, were any tests conducted on same to determine potential health hazards involved in the use of materials contained therein?

OBJECTION TO INTERROGATORY NO. 22:

Defendant objects to Interrogatory No. 22 because this defendant did not sell insulation products containing asbestos to the "public," therefore the interrogatory requires defendant to assume a fact which is not true. Products were sold to distributors - contractors who were highly experienced in the insulation field.

56. Give the trade names of your high temperature heat insulation products which do not contain asbestos, and state fully what such insulation contains.

OBJECTION TO INTERROGATORY NO. 56:

This defendant would object to this interrogatory because the question as framed calls for confidential information and trade secrets and this defendant should not be required to reveal the content of any insulation product protected by patent which product does not contain asbestos. This defendant prays for a protective order.

59. In what decade was each of the following products commercially available for use and sale?

- (a) Fiberglass;
- (b) Calcium silicate;
- (c) Mineral wool;
- (d) Rock wool;
- (e) Foamglass;
- (f) Ceramics;
- (g) Wood pulp;
- (h) Organic pulp.

OBJECTION TO INTERROGATORY NO. 59:

(a) Defendant objects to interrogatory No. 59 because this interrogatory is overly broad.

(b) Defendant objects to interrogatory No. 59 because this defendant did not manufacture insulation products containing the materials in (c) (d) (e) (f) and an answer would involve research and opinions which defendant is not required to answer.

(c) Defendant further objects because any research on items (c) - (h) is a research project performed at request of counsel for this defendant after the asbestosis litigation began.

60. List all insulation products sold in the 1940's, 1950's and 1960's which did not contain asbestos and give the physical and tensile strength and temperature decomposition data for each product.

OBJECTION TO INTERROGATORY NO. 60:

(a) Defendant objects to Interrogatory No. 60 because such calls for an engineering study which this defendant is not required to make. Defendant has given the information on all the insulation products manufactured by it containing asbestos and discontinued the manufacture of asbestos containing insulation products in September, 1971. Defendant should not be required to research and answer to this question and refuses to do so.

(b) Defendant objects to Interrogatory No. 60 because this question is overly broad and unduly burdensome and this Defendant could not possibly know or determine what insulation products were sold in the years set forth which did not contain asbestos there could have been many or few.

64. Was your medical department or industrial health department or industrial hygienist responsible for contracting unit employees?

OBJECTION TO INTERROGATORY NO. 64:

This Defendant objects to Interrogatory No. 64 because it is overly broad and unduly burdensome and is vague and indefinite in that it asks if the medical department etc. was responsible for contracting unit employees. The question is too vague and indefinite to make a responsive answer.

69. When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other diseases;
- (e) With reference to your company give the name of such official who first had such knowledge, information or understanding;
- (f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

OBJECTION TO INTERROGATORY NO. 69:

Defendant objects to Interrogatory No. 69 because the question is too vague, and indefinite and is couched in the terms of when did any official of the company first have knowledge that asbestos would or could or might produce the diseases asbestosis, mesothelioma, lung cancer or other diseases. Defendant also objects because the question is too general and is not related to the asbestos insulation worker and insulation products containing some asbestos and is therefore too general.

Defendant objects to Interrogatory No. 69(d) inquiring when did any official with the company first have knowledge, information or understanding that asbestos would or could or might produce any other diseases for the reason that the interrogatory

is too vague and indefinite as there is no meaning to the phrase "any other diseases" to which this defendant can intelligently respond.

72. Set forth a list of photographs, plats, sketches or other documents in the possession of the party that will potentially be used as an exhibit at the trial of this case by you.

OBJECTION TO INTERROGATORY NO. 72:

The Defendant objects to this interrogatory because the photographs which will be used or any exhibits which may be drafted which will be used upon the trial of any particular case will depend upon the facts in that particular case and there can be no general answer to such interrogatory.

Defendant further objects to answering said interrogatory because these are matters to be listed in any pre-trial document or pre-trial order and it will depend upon the facts of each individual case and the nature of the claim as to what document or documents may be used in the trial of that particular case. Defendant prays that it be excused from answering this general interrogatory.

73. Were you or any of your agents, servants, employees aware of any of the articles described on Exhibit A prior to the year 1950?

OBJECTION TO INTERROGATORY NO. 73:

This defendant objects to Interrogatory No. 73 for each of the following reasons:

- (a) It is too broad in scope.
- (b) It is too vague and indefinite to require an answer under oath.
- (c) The period covered by the interrogatory would be between the years 1929 to 1950 and those officers and employees are no longer employed by Fibreboard Corporation and it would be impossible to determine the knowledge of each and every former officer or employee of the company.

(d) Only those documents found on Exhibit A, Page 1, Page 2 and the first two articles on Page 3 were published prior to 1950. It would have been impossible to have any knowledge of the documents beginning with Item No. 3 on Exhibit A, Page 3 through the remainder of the document prior to 1950 because they were all published subsequent to that date, so the question is totally inappropriate.

74. If you answered the foregoing question "Yes." Then answer the following:
(a) Set forth such article you had knowledge of and the date you acquired such knowledge.

OBJECTION TO INTERROGATORY NO. 74:

Defendant repeats the same objections to Interrogatory No. 73.

77. Do you contend that none of your asbestos-containing insulation products were sold to or ever reached the premises of any or all of the concerns listed in Exhibit B attached hereto? If so, indicate which and explain the factual basis for this contention.

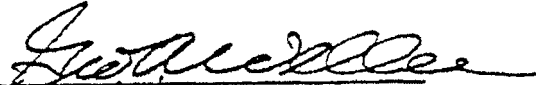
OBJECTION TO INTERROGATORY NO. 77:

Defendant objects to Interrogatory No. 77 for each of the following reasons:

(a) The interrogatory is unlimited as to date and therefore does not limit the consideration of the answers to these interrogatories to any specific case or any specific claimed exposure and it would be impossible to give an intelligent answer to said question covering periods of 20 to 25 years or more dating back from 1972.

Respectfully submitted,

WELLER, WHEELUS & GREEN
POST OFFICE BOX 350
BEAUMONT, TEXAS 77704-0350

BY 
GEORGE A. WELLER
STATE BAR NO. 21138000

ATTORNEYS FOR THE DEFENDANT
FIBREBOARD CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed to plaintiff's counsel, certified mail, return receipt requested, and to all other interested counsel of record this 18 day of February, 1983.


GEORGE A. WELLER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

IN RE ASBESTOSIS CASES

MASTER SET OF FIBREBOARD CORPORATION'S
ANSWERS AND OBJECTIONS TO PLAINTIFFS'
MASTER SET OF INTERROGATORIES

1. As to the person answering these interrogatories, state:
 - (a) Name:
 - (b) Title or position with defendant:
 - (c) Business address:
 - (d) Length of time employed by defendant:
 - (e) State year by year all other positions, titles or jobs that person has held with the defendant.

ANSWER:

- (a) R. A. Beck.
 - (b) House attorney.
 - (c) 22 Battery Street, Suite 404, San Francisco, California, 94111.
 - (d) 30 years.
 - (e)

Chemist	1950-1961
Patent Administrator	1961-1971
Patent Attorney	1971-1978
Attorney	1978-1982
2. State the following concerning this defendant:
 - (a) Full and correct name:
 - (b) Principle place of business:
 - (c) State of incorporation:
 - (d) Date of incorporation, and name of corporation:
 - (e) Is this defendant authorized to transact business in the State of Texas? If so, state the date such authority was first issued and last renewed:
 - (f) Does this defendant have an agent, representative or place of business in Texas? If so, state the name and address of such agent, representative, or place of business.
 - (g) Does this defendant have an agent for service in the State of Texas? If so, state the name and address of the registered agent.

ANSWER:

- (a) Fibreboard Corporation.
 - (b) 1300 S.W. 5th Avenue, Portland, Oregon, 97201.
 - (c) Delaware.
 - (d) This defendant was incorporated in 1917 under the name The Paraffine Companies, Inc. In 1950, the name was changed to Pabco Products, Inc. In 1956, the name was changed to Fibreboard Paper Products Corporation, and in 1966, the name was changed to Fibreboard Corporation.
 - (e) Yes. Date issued: 1928. Date last renewed: Still in effect.
 - (f) Defendant has a sales office at 9800 N.W. Freeway, Suite 103, Houston, Texas, 77092.
 - (g) Yes. Joe Heffington, 416 Littlefield Building, Austin, Texas, 78701.
3. Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 2 above concerning the defendant as correctly named.

ANSWER:

- Yes, this defendant's correct legal name is Fibreboard Corporation.
4. Has this defendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, processed, distributed or contracted to apply insulation products containing asbestos?

ANSWER:

In 1928, The Paraffine Companies, Inc. purchased Plant Rubber and Asbestos Works, San Francisco, California, which was set up and operated as a wholly-owned subsidiary. In 1947, Plant Rubber and Asbestos Works was dissolved (as a separate corporate entity) and The Paraffine Companies, Inc. assumed the manufacturing of asbestos-insulation products. Simultaneously, the name "Plant" was sold to a company in Emeryville, California.

5. If the answer to Interrogatory No. 4 is "Yes," then state the following concerning such predecessor:
- (a) Full and correct name:
 - (b) The principle place of business:
 - (c) State of incorporation:
 - (d) Date of acquisition by defendant:
 - (e) Was this business authorized to transact business in the State of Texas?
 - (f) Attach copies of all papers pertaining to the acquisition.

ANSWER:

- (a) Plant Rubber & Asbestos Works.
 - (b) San Francisco, California.
 - (c) California.
 - (d) 1928.
 - (e) Unknown.
 - (f) Objection: Unduly burdensome, harassing, irrelevant. This happened 52 years ago; documents are not readily available.
6. As to any product containing asbestos in any form, has this defendant, or any predecessor(s):
- (a) Ever designed such a product?
 - (b) Manufactured such a product?
 - (c) Processed such a product?
 - (d) Sold such a product?
 - (e) Distributed such a product?
 - (f) Patented such a product?
 - (g) Relabeled such a product which was manufactured, sold, or distributed by another company?

ANSWER:

- (a) Defendant "designed" the precision molded process for manufacture of insulation.
 - (b) Yes.
 - (c) Do not understand the question.
 - (d) Yes.
 - (e) Yes.
 - (f) In the past, defendant has owned patents related primarily to methods of manufacture of such product.
 - (g) Yes, products were manufactured by this defendant, relabeled and sold to another.
7. If your answer to No. 6(b), 6(d) and 6(e) is "Yes", then give the trade name of the product, the year the defendant or predecessor first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER:

See Exhibit "A" attached. None manufactured since September, 1971.

8. Have any of the products listed above in Interrogatory No. 6 been altered in chemical composition since first being marketed?

ANSWER:

Yes.

9. If so, please state:

- (a) The trade name of each such product.
- (b) The date each such product was altered.
- (c) The nature of the alteration.
- (d) The reason for the alteration.

ANSWER:

(a) Minor day to day formulation changes of no substantial significance were undoubtedly made. However, the only major change commenced with a research project, begun in 1967, to develop substitutes for asbestos fiber in thermal insulation. Asbestos content was gradually reduced and, in September 1971, all use of asbestos was discontinued.

(b) See Answer No. 9(a).

(c) See Answer No. 9(a).

(d) Information was received which claimed that even the small percentage of asbestos in these products could be harmful to health if used without respirators or adequate ventilation.

10. What is the name, address, and the job title of each individual who participated in the design and preparation of manufacturing specifications for each such product?

ANSWER:

We are not certain of the meaning of "who participated in the design and preparation of manufacturing specifications for each such product." We will presume it means those personnel who developed the product.

Information not available for Prasco or original 85% magnesia product.

Precision molded process for manufacture developed by S. A. Abrahams, believed to be deceased, R. Lewon, deceased and L. Collogne, present whereabouts unknown.

Other products by the above and/or H. P. Hoopes, former Director of Insulation Research, now retired, 1160 Oxford Street, Berkley, California; C. E. Miller, former Research Chemist, deceased; H. L. Weber, former Research Chemist, now in Seattle, Washington.

11. Do any written memoranda, specifications, blueprints or other written materials of any kind or character relating to the design and preparation of said products now exist?

ANSWER:

None have been located.

12. In so, please state:

- (a) List each written material or document.
- (b) Who presently has possession of each such document.
- (c) Where is it located.

ANSWER:

- (a) See Answer to No. 11.
- (b) See Answer to No. 11
- (c) See Answer to No. 11.

13. In what year did the defendant first begin selling or distributing insulation products containing asbestos?

ANSWER:

See Exhibit "A".

14. In what year did the defendant last sell the insulation product which contained asbestos?

ANSWER:

See Exhibit "A".

15. As to the named defendant or any predecessor(s) or acquired business, state the various types of products, such as blocks, pipe covering, cements, tape, spray-on insulation, mastics, and cloth, and in connection with each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

ANSWER:

See Exhibit "A". Defendant manufactured and sold blocks, pipe covering and insulating cements. Blocks and pipe covering were packaged in corrugated paperboard boxes; insulating cements packaged in bags.

16. Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any insulation products containing asbestos? If so, give the brand names of such products, the binding material and date first manufactured.

ANSWER:

No.

17. Were each of your insulation products generally expected to reach, or were packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Yes, they were packaged to reach the consumer or user without substantial change.

18. If your answer to Interrogatory No. 17 is "No," with respect to any product, explain in what way the defendant claims its products were altered or substantially changed after sale or distribution and before reaching the insulation helper or mechanic.

ANSWER:

Not applicable.

19. Do you admit that asbestos insulation applicators, helpers or mechanics, were foreseeable users of defendant's asbestos-contained insulation products, such as:

- (a) Pipe covering:
- (b) Blocks:
- (c) Asbestos cloth:
- (d) Mastics:
- (e) Spray-on insulation:
- (f) Rope or tape:
- (g) Asbestos sheeting or millboard:
- (h) Cements:

ANSWER:

- (a) Yes.
- (b) Yes.
- (c) - (g) We did not make or sell these.
- (h) Yes.

20. Based upon the material contents of your products, the method of manufacturing, of the method of application for the purpose of insulation, can your products be generally applied by an insulator without liberating asbestos fibers?

- (a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name.
- (b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

ANSWER:

OBJECTION TO INTERROGATORY NO. 20:

Defendant objects to Interrogatory No. 20 because the question is vague, ambiguous, unclear and misleading in that it talks about "liberating asbestos fibres" without defining the quantities, if millions of fibres were released every second the product was applied or if one fibre were released during a year of application work, and the answer would be misleading and prejudicial without an involved explanation

ANSWER SUBJECT TO OBJECTION:

As the question is framed in the present tense the answer is "yes." Defendant's insulation products have contained no asbestos for the last eleven years (1971-1982) and thus can be applied without liberating asbestos fibres.

If the question is reframed to apply to years prior to 1971 when Fibreboard Corporation was manufacturing insulation products containing some asbestos, the answer would have to be "No."

21. Was it a foreseeable use of your asbestos-containing insulation products that they may have to be removed, stripped or replaced at any time after installation; If your company contends the plaintiff(s) misused any of your products then state how and under what circumstances your product was misused.

ANSWER

OBJECTION TO INTERROGATORY NO. 21:

21(a) Defendant objects because this is a compound interrogatory, containing two separate, distinct and unrelated questions.

21(b) Defendant objects to the first question, "was it foreseeable," because the question is too vague, indefinite, ambiguous and unclear - foreseeable to whom?; foreseeable when?; foreseeable under what conditions?

Further, the foreseeability relates to whether or not products "may have to be removed, stripped," etc. This would require pure guess, speculation, conjecture and cannot be answered under oath.

21(c) Defendant objects to the second part of the interrogatory as a plaintiff's "misuse" would depend upon the circumstances of each case and cannot be answered generally. Examples of misuse are continuing to work with asbestos products without use of respirators, and without exhaust fans after warning.

22. Prior to releasing the products listed in Interrogatory No. 6 to the public for sale, were any tests conducted on same to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

OBJECTION TO INTERROGATORY NO. 22:

Defendant objects to Interrogatory No. 22 because this defendant did not sell insulation products containing asbestos to the "public," therefore the interrogatory requires defendant to assume a fact which is not true. Products were sold to distributors - contractors who were highly experienced in the insulation field.

ANSWER SUBJECT TO OBJECTION:

The high temperature thermal insulation containing some asbestos manufactured by this defendant comprised a single line of products first sold in the late 1920's by predecessors, up to September, 1971, the only changes made during that time period were reductions in asbestos content.

Defendant has no record of any tests conducted on this line of products prior to the first sale in the late 1920's, nor does it have any indication that information was available at that time which would have indicated the need for tests.

23. If so, please state:

- (a) The name, address, and job classification of each individual who conducted such tests.
- (b) The results of such said tests.
- (c) Date of such studies.

ANSWER:

Not applicable.

24. Do any written memoranda, specifications, blueprints or other written materials of any kind or character exist relating to the testing of such products?

ANSWER:

Not applicable.

25. If so, please state:

- (a) List each such written material or document.
- (b) Who presently has possession of each such document and where it is located.

ANSWER:

Not applicable.

26. Did defendant or any of its subsidiary companies make any design changes as a result of such tests?

ANSWER:

Not applicable. See Answer to Interrogatory No. 22.

27. If so, please state:

- (a) The nature of the change made.
- (b) The name, address, and job classification of each person in charge of making a change.

ANSWER:

Not applicable.

28. After releasing said products to the public, were any tests conducted thereon to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

No. When information became available indicating the small percentage of asbestos in these products might create sufficient airborne asbestos dust to be a potential health hazard if respirators or adequate ventilation were not used, defendant chose to apply a warning and begin research to eliminate asbestos.

29. If so, please state:

- (a) The name, address, and job classification of each person conducting said tests.
- (b) The results of said tests.

ANSWER:

- (a) Not applicable. See Answer to No. 28.

- (b) Not applicable. See Answer to No. 28.

30. Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to go to areas where your products were being used or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the findings, and attach results.

ANSWER:

No, we did not regularly inspect the area where workers were using products manufactured by our company. Scientists engaged by the United States Government and others, as well as published literature, indicated that in areas where workers were using our products dust counts were below the threshold limit values set by the American Conference of Governmental Industrial Hygienists. As a seller of products, we had no right to enter a customer's premises for inspection.

31. If your company performed or had performed any dust level counts, what action based on the results did your company take?

ANSWER:

Not applicable. See answer to Interrogatory No. 30.

32. Has your company or its predecessor(s) ever conducted any studies concerning the effects of the inhalation of asbestos dust or fibers on one using or being exposed to any of the asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? In answer to this question, give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to whom such reports were given, and the date.

ANSWER:

No studies were made directly by this defendant.

33. Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's insulation products? If so, give the following:

- (a) Name of the person or firm conducting such studies:
- (b) The date the studies began and the date completed:
- (c) Any publication or dissemination of the results of the studies:
- (d) The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers:
- (e) Attach copies.

ANSWER:

See Answer to Interrogatory No. 32.

34. If your answer to Interrogatory No. 33 was "Yes." state the name and address of such industrial hygienist or hygienists.

ANSWER:

Not applicable. See answer to Interrogatory No. 32.

35. Does your company have, has it ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

- (a) How much expended each year on research, etc.:
- (b) What percentage of gross sales did your company or its predecessor spend on research concerning the health effects of asbestos.

ANSWER:

Yes, we had and have a company Research Department for our Insulation Division, since the 1930's or early 1940's until today. With respect to Subparts (a) and (b) this information has not been retained.

36. State in detail the purpose, duties and responsibilities of such Research Department.

ANSWER:

The Research Department concerns itself with the improvement and development of insulation products which are manufactured and to be manufactured by the corporation.

37. Does your company have, has it ever had, or has your predecessor ever had, a Medical Department? If so, give the year such Medical Department was established, and whether or not such Medical Department has operated continuously since being established.

(a) Name each director, chief, or head of your Medical Department year by year with the first year you had a medical director or Medical Department. Give the last known address of each.

ANSWER:

Defendant had a medical department from about 1930 until about 1957.

(a) Medical Director: Dr. Wahle, 1930's and early 1940's; deceased.

Plant Physicians, Emeryville Plant:

Dr. Henry Perlmutter, 1940's part-time; present address:

460 Valle Del Oro Road, Tucson, Arizona

Dr. Christopher Adamson, 1950's, part-time:

1178 San Pablo Avenue, Berkeley, California

38. State in detail the duties and responsibilities of such Medical Department.

ANSWER:

Primarily First Aid.

39. Prior to 1965, did your company, or any predecessor(s), ever at any time give insulation mechanics or insulation helpers who would be applying or removing your products instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER:

No.

40. Did your company, or your predecessor(s), ever place any warning signs on the containers in which asbestos insulation products were packaged?

ANSWER:

Yes.

41. If you have answered Interrogatory No. 40 in the affirmative, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your insulation products, or containers?

(b) On what date was such warning actually first placed on your insulation products or containers?

ANSWER:

Yes, we had and have a company Research Department for our Insulation Division, since the 1930's or early 1940's until today. With respect to Subparts (a) and (b) this information has not been retained.

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(a) Medical Director: Dr. Wahle, 1930's and early 1940's; deceased.

Plant Physicians, Emeryville Plant:

Dr. Henry Perlmutter, 1940's part-time; present address:

460 Valle Del Oro Road, Tucson, Arizona

Dr. Christopher Adamson, 1950's, part-time:

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Yes.

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(a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your insulation products, or containers?

(b) On what date was such warning actually first placed on your insulation products or containers?

- (c) On what date did your insulation products, accompanied by such warning, first reach the insulation contractor?
- (d) State the exact wording of the first warning.
- (e) State the exact size of the warning printed on your asbestos insulation products or containers.
- (f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?
- (g) Why did your company or its predecessor(s) place such warning on your asbestos insulation products or containers?
- (h) Did your company or its predecessor(s) place such warning on your asbestos insulation products or containers because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute: If so, from whom and on date did you receive such directive, command, suggestion, legal opinion, or other type of communication.
- (i) If the wording of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording.

ANSWER:

- (a) No record or recollection of such date exists.
- (b) 1966. It was first stenciled on all containers, then a printed "caution" notice was pasted on; the warning was printed on cartons when cartons were manufactured.
- (c) Unknown: presumed to be 1966.
- (d) See Exhibit "B".
- (e) See Exhibit "B". Size may have been changed.
- (f) Yes.
- (g) To alert users of potential hazards.
- (h) A combination of factors was involved.
- (i) Not changed.

42. Did your company or its predecessor(s) ever place any warning directly on any of its asbestos insulation pipe covering itself, block itself, cloth itself, or millboard itself?

ANSWER:

Warning on containers only. We did not manufacture cloth or millboard.

43. Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, or millboard?

ANSWER:

Not to the best recollection of employees. We did not manufacture asbestos cloth or millboard.

44. Did the warning inquired about in Interrogatories Nos. 42 and 43, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

ANSWER:

No, it was never used in sales literature. We did distribute materials from the National Insulation Manufacturers Association in about 1967.

45. On what date was the sales literature inquired about in Interrogatory No. 44 first provided to distributors or sellers of your company's products, or your predecessor(s)'s products?

ANSWER:

Not applicable.

46. Has your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER:

Yes, this defendant conducted a research and development program from the mid-1960's to 1971 on asbestos-free high temperature insulations. Such insulation was placed on the market in 1971 and contains no asbestos.

47. Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

ANSWER:

We do not understand the meaning of "material safety data sheets".

48. Did your company or its predecessor ever recall any products containing asbestos from the common market?

(a) State all details of such recall, giving the name of the product, the time of recall and any further action taken in connection with the recall.

ANSWER:

No.

49. Has your company or its predecessor(s) ever directly advised any contractor to whom you sell your products containing asbestos of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor, and the name of each contractor.

ANSWER:

No, but in about 1967, by recollection of employees, a brochure published by NIMA was distributed to customers. A copy of this brochure is attached as Exhibit "C".

50. Prior to 1964 did your company or its predecessor(s) ever manufacture insulation products containing asbestos without a warning? List the years.

ANSWER:

Yes. 1928 to 1964.

51. After 1964 did you ever manufacture insulation products containing asbestos without a warning? If so, list the name of the product and the years.

ANSWER:

Yes. Beginning in 1966 through September, 1971, all containers of our products contained a warning. See attached Exhibit "B".

52. Prior to 1970, did your company, or any predecessor(s), ever manufacture and sell a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER:

No.

53. Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any insulation products containing asbestos? If so, give the brand names of such products and the binding material and date of first manufacture of such product.

ANSWER:

No, this defendant has not manufactured any insulation products containing asbestos since September 1971.

54. If your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos, state what prompted your company to devise such high temperature heat insulation not containing asbestos.

ANSWER:

In 1966, (the mid 1960's), medical information and studies began to indicate possible harm to insulation workers from insulation products containing some asbestos. Defendant then began research on development of an asbestos-free product.

55. Has such high temperature heat insulation not containing asbestos performed satisfactorily; that is, is such insulation suitable for the purpose for which it is to be used?

ANSWER:

Yes, although it was not as efficient or strong as the prior product.

56. Give the trade names of your high temperature heat insulation products which do not contain asbestos, and state fully what such insulation contains.

ANSWER:

OBJECTION TO INTERROGATORY NO. 56

This defendant would object to this interrogatory because the question as framed calls for confidential information and trade secrets and this defendant should not be required to reveal the content of any insulation product protected by patent which product does not contain asbestos. This defendant prays for a protective order.

ANSWER SUBJECT TO OBJECTION:

Fibreboard Corporation has devised a high heat temperature heat insulation which does not contain asbestos. The trade name is Pabco Super Caltemp. Counsel will submit to the Court the exact content of the non-asbestos containing insulation and the Court can determine whether it is necessary to release this confidential information to plaintiff's counsel.

57. State the decade that there first existed manufacturing technology for commercial purposes the use of chemicals and minerals for combining into a high heat insulation product a substitute for asbestos in insulation materials.

ANSWER:

This question does not make sense. We developed a substitute in 1971.

58. To your company's knowledge, in what decade was fiberglass first commercially available for insulation over 350° F.?

ANSWER:

Not known, this would require research on the part of Defendant and opinions which this Defendant is not required to answer.

59. In what decade was each of the following products commercially available for use and sale:

- (a) Fiberglass;
- (b) Calcium silicate;
- (c) Mineral wool;
- (d) Rock wool;
- (e) Foamglass;
- (f) Ceramics;
- (g) Wood pulp;
- (h) Organic pulp.

ANSWER:

OBJECTION TO INTERROGATORY NO. 59

(a) Defendant objects to interrogatory No. 59 because this interrogatory is overly broad.

(b) Defendant objects to interrogatory No. 59 because this defendant did not manufacture insulation products containing the materials in (c) (d) (e) (f), and an answer would involve research and opinions which defendant is not required to answer.

(c) Defendant further objects because any research on items (c) - (h) is a research work project performed at request of counsel for this defendant after the asbestosis litigation began.

ANSWER SUBJECT TO OBJECTION:

- (a) See Answer to Interrogatory No. 58.
- (b) First commercially available, containing asbestos in 1940's, from others.
First commercially available without asbestos in 1971, from this defendant only, as Pabco Super Caltemp.

60. List all insulation products sold in the 1940's, 1950's and 1960's which did not contain asbestos and give the physical and tensile strength and temperature decomposition data for each product.

ANSWER:

OBJECTION TO INTERROGATORY NO. 60:

(a) Defendant objects to Interrogatory No. 60 because such calls for an engineering study which this defendant is not required to make. Defendant has given the information on all the insulation products manufactured by it containing asbestos and discontinued

the manufacture of asbestos containing insulation products in September, 1971. Defendant should not be required to research and answer to this question and refuses to do so.

(b) Defendant objects to Interrogatory No. 60 because this question is overly broad and unduly burdensome and this Defendant could not possibly know or determine what insulation products were sold in the years set forth which did not contain asbestos there could have been many or few.

61. Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER:

Prior to 1947, a wholly-owned subsidiary of this defendant named Plant Rubber & Asbestos Works did some contracting work. This subsidiary was dissolved in 1947. During the period 1959-1961, a wholly-owned subsidiary named Pabco Insulation Corporation did contracting work. This subsidiary was dissolved in 1961.

62. Did any division of your company or subsidiary company engaged in the contract business of applying insulation products or your workmen's compensation insurance carrier ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is "Yes," give the name of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER:

Retained records of this defendant do not distinguish among types of employees; thus, the question cannot be answered from available information. Workmen's Compensation records will be made available for inspection at a reasonable time upon request.

63. Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER:

See answer to Interrogatory No. 62.

64. Was your medical department or industrial health department or industrial hygienist responsible for contracting unit employees?

ANSWER:

OBJECTION TO INTERROGATORY NO. 64:

This Defendant objects to Interrogatory No. 64 because it is overly broad and unduly burdensome and is vague and indefinite in that it asks if the medical department etc. was responsible for contracting unit employees. The question is too vague and indefinite to make a responsive answer.

65. Did your company or its predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER:

None were made.

66. State the year that this defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.

ANSWER:

Defendant through its employees had general knowledge of recommended Threshold Limit Values from the late 1960's. Name of the specific employee is not recalled; perhaps Mr. H. P. Hoopes, now retired, of 1160 Oxford Street, Berkeley, California. No written instrument has been located.

67. Was such threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 66 TOTAL dust and not just asbestos dust?

ANSWER:

Asbestos dust.

68. State in detail what test, if any, your company ever made with regard to the quantity, quality of threshold limit values of asbestos dust or particles to which insulators were exposed while using your products containing asbestos.
- (a) If there were any such tests or studies, give the name or names of the person(s) conducting the tests, the date of the tests and attach true copies of any reports, findings or memorandums concerning such tests or studies.

ANSWER:

No tests have been made by this Defendant.

Beginning in 1966, containers of our products had the following warning labels on them: "CAUTION: This product contains asbestos fibers. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by U. S. Bureau of Mines."

We were of the opinion that contractors engaged in the insulation business, and insulation workers, were well aware of the problem created by inhalation of dust, and that respirators or masks had been in use by asbestos workers for a number of years.

69. When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other diseases;
- (e) With reference to your company give the name of such official who first had such knowledge, information or understanding;
- (f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

ANSWER:

OBJECTION TO INTERROGATORY NO. 69:

Defendant objects to Interrogatory No. 69 because the question is too vague, and indefinite and is couched in the terms of when did any official of the company

first have knowledge that asbestos would or could or might produce the diseases asbestosis, mesothelioma, lung cancer or other diseases. Defendant also objects because the question is too general and is not related to the asbestos insulation work and insulation products containing some asbestos and is therefore too general.

ANSWER SUBJECT TO OBJECTION:

(a) Insofar as can be determined from corporate records, the first knowledge of an actual case of asbestosis was in 1957 when an employee who had worked for many years in very dusty insulation manufacturing operations, including the use of pure asbestos, developed asbestosis. However, this type of exposure was regarded as entirely different from that of users of products containing a small percentage of asbestos.

(b) (c) Defendant has been unable to determine a specific date or the approximate date it might have heard of an association between the inhalation of asbestos fibers and the contraction of lung cancer, nor do we have a specific recollection of its source. We believe that we may have heard of the claims of the possibility of such associations in the late 1960's; the source may have been the articles published by Dr. Irving J. Selikoff, who first reported there were no greater incidences of lung cancer in asbestos insulators who did not smoke cigarettes than the average American. There were increased instances of lung cancer in smokers, and further increased incidences of lung cancer in smokers who were insulators exposed to asbestos dust. According to these reports of Dr. Selikoff, claims of an association of exposure to asbestos insulation products with mesothelioma occurred at the same time.

(d) Any other diseases - Defendant objects to Interrogatory No. 69(d) inquiring when did any official with the company first have knowledge, information or understanding that asbestos would or could or might produce any other diseases for the reason that the interrogatory is too vague and indefinite as there is no meaning to the phrase "any other diseases" to which this Defendant can intelligently respond.

(e) Referring to (c) above, Ms. Dorothy Hansen, retired, 575 Corbett St., San Francisco, CA.

Referring to (b), (c) Mr. F. A. Nordstrom, retired, P. O. Box 970, Murphy's, CA, or H. P. Hoopes, retired, 1160 Oxford St., Berkeley, CA.

(f) A corporate file exists as to (a) above, which may be examined at a reasonable time. As to (b) and (c), see publications by Dr. Selikoff et al.

70. As to every product of yours which you have identified in previous interrogatories state specific type or types of asbestos, (i.e., crocidolite, chrysotile, amosite or any others) which your products contained. If you have any percentage figures available, then give the percentage as to each product.

ANSWER:

See Exhibit "A".

Up to September, 1971, products contained either amosite, a mixture of amosite and chrysotile or chrysotile asbestos. We did not manufacture products containing asbestos after September, 1971.

71. Does defendant contend that plaintiff improperly used its products?

ANSWER:

We don't know if Plaintiff used our product. Such interrogatory cannot be answered generally. As to individual plaintiffs, it can only be answered after discovery.

72. Set forth a list of photographs, plats, sketches or other documents in the possession of the party that will potentially be used as an exhibit at the trial of this case by you.

ANSWER:

OBJECTION TO INTERROGATORY NO. 72:

The Defendant objects to this interrogatory because the photographs which will be used or any exhibits which may be drafted which will be used upon the trial of any particular case will depend upon the facts in that particular case and there can be no general answer to such interrogatory.

Defendant further objects to answering said interrogatory because these are matters to be listed in any pre-trial document or pre-trial order and it will depend upon the facts of each individual case and the nature of the claim as to what document or documents may be used in the trial of that particular case. Defendant prays that it be excused from answering this general interrogatory.

73. Were you or any of your agents, servants, employees aware of any of the articles described on Exhibit A prior to the year 1950?

ANSWER:

OBJECTION TO INTERROGATORY NO. 73:

This defendant objects to Interrogatory No. 73 for each of the following reasons:

- (a) It is too broad in scope.
- (b) It is too vague and indefinite to require an answer under oath.
- (c) The period covered by the interrogatory would be between the years 1929 to 1950 and those officers and employees are no longer employed by Fibreboard Corporation and it would be impossible to determine the knowledge of each and every former officer or employee of the company.

(d) Only those documents found on Exhibit A, Page 1, Page 2 and the first two articles on Page 3 were published prior to 1950. It would have been impossible to have any knowledge of the documents beginning with Item No. 3 on Exhibit A, Page 3 through the remainder of the document prior to 1950 because they were all published subsequent to that date, so the question is totally inappropriate.

ANSWER SUBJECT TO OBJECTION:

Defendant has no record and has no recollection of any such awareness.

74. If you answered the foregoing question "Yes." then answer the following:
(a) Set forth such article you had knowledge of and the date you acquired such knowledge.

ANSWER:

OBJECTION TO INTERROGATORY NO. 74:

Defendant repeats the same objections to Interrogatory No. 73.

ANSWER SUBJECT TO OBJECTION:

See answer to Interrogatory No. 73.

75. As of January 1, 1965, what quantity of the following asbestos-containing insulation products were stored in your warehousing facility or facilities awaiting sale to contractors or other concerns:
(a) Pipe covering (state figure and number of boxes);
(b) Block (state figure and number of boxes);
(c) Cement (state figure and number of bags).

ANSWER:

As to (a), (b) and (c) we have no inventory as of January 1, 1965, giving the quantity of pipe covering, or block, or cement which was in warehousing facilities at that time and therefore the interrogatory cannot be answered.

76. Do you have any photographs of the products inquired about above or their packages or containers? If so, please attach exact copies.

ANSWER:

See answer to No. 75.

We do not have photographs of the packaging containers inquired about which were in our warehouse in 1965.

77. Do you contend that none of your asbestos-containing insulation products were sold to or ever reached the premises of any or all of the concerns listed in Exhibit B attached hereto? If so, indicate which and explain the factual basis for this contention.

ANSWER:

OBJECTION TO INTERROGATORY NO. 77:

Defendant objects to Interrogatory No. 77 for each of the following reasons:

- (a) The interrogatory is unlimited as to date and therefore does not limit the consideration of the answers of these interrogatories to any specific case or any specific claimed exposure and it would be impossible to give an intelligent answer to said question covering periods of 20 to 25 years or more dating back from 1972.

ANSWER SUBJECT TO OBJECTION:

Yes, Fibreboard Corporation did not sell directly to industrial plants but sold to insulation contractors. No asbestos-containing products were manufactured after September, 1971. You have asked defendant to explain the factual basis for this answer and we will give several examples.

Regarding Consolidated Shipyard, Orange, Texas, there have been a number of cases filed by individual plaintiffs contending they were exposed to certain products at the Consolidated Shipyard, Orange, Texas, during World War II. Fibreboard has at all times denied that its product was used in this shipyard. All testimony of all witnesses to counsel's knowledge has been that no one has ever identified a Fibreboard Corporation product at Consolidated Shipyard. This defendant has refused to settle or contribute to any settlement of any case originating from exposures at Consolidated Shipyard.

Regarding Union Oil, Port Neches, Texas, this defendant's counsel has made extensive investigation at this plant and it has been determined that Fibreboard Corporation products were not used by Union Oil Company prior to June of 1972.

Another example is that the two main suppliers of the Texaco Refinery in Port Arthur, Texas, were Thorpe Insulation, Houston, Texas, which was a distributor for Johns-Manville Products, and Sabine Insulation, which was largely a distributor for KAYLO or Owens-Corning Products.

Fibreboard Corporation did not sell products to Texaco Refinery, Port Arthur, Texas; Gulf Oil Corporation, Port Arthur, Texas; or Arco Polymers Refinery, Port Arthur, Texas.

Respectfully submitted,

WELLER, WHEELUS & GREEN
POST OFFICE BOX 350
BEAUMONT, TEXAS 77704-0350

By 
GEORGE A. WELLER
STATE BAR NO. 21138000

ATTORNEYS FOR DEFENDANT
FIBREBOARD CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed to plaintiff's counsel, certified mail, return receipt requested, and to all other interested counsel of record this 18 day of February, 1983.


GEORGE A. WELLER

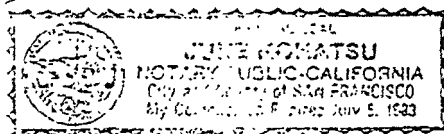
STATE OF CALIFORNIA)
) SS.
COUNTY OF SAN FRANCISCO)

ROBERT A. BECK, being first duly sworn and under oath,
does depose and say that he is an employee of the defendant,
FIBREBOARD CORPORATION, and is duly authorized to make the
foregoing Answers to Interrogatories; that he does so acting
on such authority and authorization; and that he has read over
the foregoing Answers and the same are true and correct to the
best of his information and belief. The Answers are based on
information secured from various sources within the company and
otherwise.

Robert A. Beck
ROBERT A. BECK

SUBSCRIBED AND SWORN TO
before me by the said ROBERT A. BECK,
to certify which witness my hand and
seal of office on this 26th day of
January, 1983.

James K. Katsu
Notary Public



INSULATION PRODUCTS

Since 1948, Insulation products have been sold under the trade name, "PABCO". Prior to 1948, all insulation products were manufactured and sold by a wholly-owned subsidiary under the name, "PLANT". Unless otherwise noted, products were sold as blocks, pipe covering segments and insulating cements. Products contained chrysotile or amosite asbestos or mixtures thereof. No asbestos in any products manufactured after September, 1971.

BRAND NAMES:

1. PRASCO: 85% diatomaceous earth and binders; 15% asbestos; manufactured from about 1928 to 1957.
2. 85% MAGNESIA: 85% basic magnesium carbonate; 15% asbestos; manufactured from about 1958 - 1966.
3. FI: Insulating cement only; 95%+ calcium silicate, 5%- asbestos; manufactured 1963 - 1966.
4. NO. 127: Insulating cement only, same as FI, but no asbestos after September, 1971; manufactured from 1966.
5. CALTEMP: 88%+ calcium silicate, 12%- asbestos. (called Caltherm in 1952). Manufactured from about 1952 through 1968.
6. SUPER CALTEMP: Primarily calcium silicate; asbestos content was gradually decreased from about 10% in 1968 to about 3-1/2% in 1971. All asbestos removed from product in September, 1971. Manufactured from about 1968 to date.

NOTE: From 1960 to 1972, defendant manufactured "KAYLO" for Owens-Corning Fiberglas under a rebrand contract to OCF's specifications and packaged in OCF's containers for the 13 western states.

From 1964 to 1972, "LK" Insulation was manufactured for Armstrong Contracting & Supply under a similar contract for the west and midwest.

From 1968 to 1971, "PYROCAL" insulation was manufactured for PPG Industries under a similar, but oral, contract.

Formulas for the three preceding products were the same as Caltemp or Supercaltemp made at the same time; blocks and Pipe Covering only.

In a recent deposition of a prior employee, testimony was given that in the early 1940s, an aircell product containing asbestos was sold under the name, "PLANT". Precise composition is not known.

OTHER PRODUCTS

At times in the past, certain other products containing asbestos were made and sold by this Defendant. Very little information remains with respect to these products, but the following is known:

1. At some time in the 1950s, it is believed for only a short time, a floor covering containing asbestos was made and sold.

2. From about 1948 until about 1962, shingles and siding made from Portland cement and asbestos were made and sold.

3. At times not specifically known between the late 1940s and about 1969, Defendant made and sold rolls of what is commonly called "tar paper" comprising a base sheet saturated with asphalt. In some instances, the base sheet was made of asbestos. Also, a roof patching compound contained some asbestos.

4. Information indicates a paint product containing some asbestos was also made and sold. Further information not available.

All of the foregoing were sold under the brand name, "PABCO".

EXHIBIT B.

CAUTION

THIS PRODUCT CONTAINS ASBESTOS
FIBER. IF DUST IS CREATED WHEN THIS PRODUCT IS
HANDLED, AVOID BREATHING THE DUST.
IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE
WEAR RESPIRATOR APPROVED BY U. S. BUREAU
OF MINES.

d. the name and address of any intermediate supplier or distributor who sold this defendant's products to plaintiff's employer during the period referred to above;

e. did your company affix its corporate logo or insignia on the packages of asbestos containing insulation products that it distributed and sold? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or log was utilized. Annex hereto a photograph or copy of each such logo described in this matter;

f. please describe in detail the type of packages in which defendant has sold, distributed or manufactured asbestos material, listing the dates each type of package was used, a physical description thereof and description of any printed material or trademark that appeared thereon.

ANSWER: See answer to Interrogatory Nos. B.19., C.6., C.9 and C.15.

Asbestos containing pipe covering and block were wrapped with kraft paper and sold in cardboard boxes. Asbestos cements were sold in multi-ply kraft paper bags and heavy duty, polyethylene bags. Asbestos yarns were wound on paper tubes and shipped in fiberboard cartons or wooden boxes. Asbestos cloth was rolled, wrapped in laminated kraft paper, and tied with tape or twine. The roll was then placed in burlap tubing. In later years, the burlap tubing was replaced by reinforced paper.

Asbestos tubing, depending on the specified size, was packaged on spools, wound on reels or cut to specified lengths, and placed in fiberboard cartons. Asbestos tape was rolled, bound with white twine, and placed in fiberboard cartons. Asbestos sheeting was rolled on tubes then wrapped in laminated kraft paper, tied with tape then placed in fiberboard cartons with paper lining between each roll. Larger sheets, which were individually wrapped in kraft paper, were placed in corrugated fiberboard cartons or placed in wooden crates

Printing on the cartons or bags usually included the J-M logo, the name "Johns-Manville", the product name, the size and the weight. Additional language may have been used from time to time. Photographs and product literature are located at the document repository maintained by the Fund in Denver, Colorado, and will be produced at a time agreed upon by the parties.

C.8. Have any of the products listed in Interrogatory C.7. above been altered in chemical composition since being marketed? If so, set forth the following information:

- a. the date of each alteration;
- b. a detailed description of the nature of each alteration;
- c. the reason for such alteration.

ANSWER: The Fund is not aware of particular uses of Manville asbestos and asbestos containing products by plaintiff's employer that might have altered the chemical composition of the asbestos sold by Manville Corporation or related entities.

C.9. Have you discontinued manufacturing and/or distributing and/or supplying or selling any asbestos or asbestos products referred to in C.7.? If so, set forth the following information:

- a. what such product is;
- b. the reasons therefor;
- c. when the discontinuance took place.

If your answer to C.6. is either "No" or "unknown" but your answer to B.14. is "Yes" provide answers to C.10. through C.18. Otherwise you may proceed to C.19.

ANSWER: Yes. Manville Corporation or related entities discontinued the manufacture of most asbestos containing thermal insulation products in the 1972 to 1973 time period. See Exhibit A for dates of manufacture. These products were discontinued in part due to concerns about the health consequences of occupational exposure to asbestos. Manville Corporation or related entities developed asbestos free replacement products for many of the asbestos containing products which were manufactured previously. No asbestos containing products have been manufactured by Manville since 1985.

With respect to asbestos fiber, Manville Corporation sold its interests in asbestos mining and milling operations in 1983, and has not sold asbestos fiber since that date.

C.10. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.

ANSWER: See answer to Interrogatory No. C.9.

C.11. With reference to your answer to B.18. state the names and addresses of the entities to whom the products were sold.

ANSWER: See answer to Interrogatory No. B.1.

C.12. Did your company and/or its affiliates or subsidiaries do business with or utilize any distributors in the State of New Jersey for purposes of selling or installing its asbestos products? If so, identify each such entity, indicate and describe the nature of the business that you did with each such entity, and set forth the dates this business relationship existed.

ANSWER: The following organizations were New Jersey distributors of asbestos containing products manufactured by Manville or related entities: Seashore Supply Company; L & H Plumbing & Heating; Porter-Hayden Company; S. Franklin & Sons; Medford Plumbing Supply; Fiber Flex, Inc.; York Sheet Metal; Ridgewood Corporation; Wallwork Somerset; Dumphey Smith Company; King Insulation Company; United Supply Company; Viking Insulation; SJB Pipe; Wallwork Brothers. See answer to Interrogatory No. B.40.

C.13. Has your company ever employed any employees or salesmen whose responsibility it was to sell your company's asbestos containing products to a geographical area encompassing the State of New Jersey? If so, for each such employee or salesman who worked for your company, indicate the dates of his employment, his name and address.

ANSWER: The following individuals were responsible for sales of asbestos containing products in New Jersey:

Percival Coggins
3993 Park Avenue
Seaford, NY 11783

Al Feininger
909 Midland Avenue
Yonkers, NY 10704

August Pocius
113 Camino Trail
Pontre Bedra Beach, FL 32082

Dudley G. Porter
909 Via Tuins
P.O. Box 1324
Puntagorda, FL 33950

Thomas P. Williams
2261 S. Interlocken Drive
Evergreen, CO 80439

C.14. Give a complete and detailed description of the manner in which your company packaged each of the asbestos containing products that it manufactured and/or distributed in the State of New Jersey. Include in your description the type of packaging that was used and the material each type of packaging was comprised of.

ANSWER: See answer to Interrogatory Nos. C.7 and C.15.

C.15. Did your company affix its corporate logo or insignia on the packages of asbestos containing products that it distributed and sold in the State of New Jersey? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or log was utilized. Annex hereto a photograph or copy of each such logo described in this answer.

ANSWER: Yes. Photographs of various products are located at the document repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties. See also answers to Interrogatories No. B.39 and No. C.7.

C.16. Did the packages or containers for the asbestos containing products that your company sold or distributed in the State of New Jersey contain any writing or labels? If so, for each such package or container which contained a label, set forth the following information about the writing on the package or label:

- a. the size of each label;
- b. the substance of all writing on the label;
- c. the inclusive dates that each writing or label appeared on each type of product;
- d. annex hereto copies of or photographs of each such label that your company used.

ANSWER: See answer to Interrogatory Nos. B.19., B.39., C.7. and C.15.

C.17. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.

ANSWER: See answer to Interrogatory No. C.9. for information regarding asbestos containing products manufactured by Manville Corporation or related entities. The following list provides additional information.

PRODUCT DESCRIPTION AND USE

SHEETS AND BLOCKS

85% Magnesia - A high temperature insulation, composed of carbonate of magnesia and asbestos fiber, for service up to 600 degrees F.

ASBESTOCEL - An inexpensive insulation constructed of alternating layers of plain and corrugated asbestos paper for temperatures up to 300 degrees F.

Air-Cell - Very similar to ASBESTOCEL, constructed of alternating layers of plain and corrugated asbestos paper.

Asbestos "Navy Brand" FIRE FELT - A special grade of insulation, particularly adapted for marine work, or wherever a light weight insulation may be required.

Asbestos FIRE FELT - Insulating material made from felted and molded asbestos fiber for temperatures up to 1000 degrees F.

Asbestos Molded Blocks - Composed of a mass of felt-like asbestos fibers closely cemented together with a non-conducting compound.

Asbestos Sponge (Felted, Sectional, Molded) - An insulation made of layers of thin felt, composed of asbestos fiber and particles of finely ground spongy material forming an extremely cellular felt, built up like a book in laminated form, thereby confining a large volume of minute dead air cells in the felt and between the layers; for temperatures up to 700 degrees F.

EQUALITY - A material consisting of 50% carbonate of magnesia combined with asbestos and other fire-proof materials. It is especially manufactured to meet government specifications.

Flexible MIN-K - A fibrous insulating material designed principally for use on rockets, missiles, and jet aircraft; can withstand high heat and has an extremely low thermal conductivity.

High Temperature Insulation - Composed of a refractory material base of high insulating value combined with asbestos fiber and some carbonate of magnesia.

MAGNO - Consists of 35% carbonate of magnesia combined with asbestos fiber and other insulating materials. It is particularly

adaptable for insulating heating systems and is specified by U.S. and state governments for this purpose.

MIN-K 1301 - A molded fibrous insulating material designed principally for use on rockets, missiles, and jet aircraft; can withstand high heat (1300 degrees F) and has an extremely low thermal conductivity.

MIN-K 2000 - See MIN-K 1301; can withstand heat to 2000 degrees F.

MIN-K 500 - See MIN-K 1301; can withstand heat to 500 degrees F.

SONITE - Made of MIN-K insulation and used by the U.S. Navy as an underwater sound insulation.

SUPEREX 1900 - A high temperature insulation for service up to 1900 degrees F made from asbestos fiber, diatomaceous silica, and other insulating materials.

SUPEREX 2000 - A high temperature insulation for service up to 2000 degrees F; replacement product for SUPEREX 1900, with asbestos removed by 1973.

SUPEREX-M - A high temperature insulation for service up to 1600 degrees F made from asbestos fiber, diatomaceous silica, and other insulating materials; replaced by asbestos free SUPEREX 1600 in 1973.

SUPEREX SG - A block of SUPEREX insulation bonded to a fiberglass blanket.

Silicated THERMOBESTOS - Dry granular sodium silicate added to THERMOBESTOS. See THERMOBESTOS.

Super FIRE FELT - A lighter weight variation of Asbestos FIRE FELT; temperature limit of 700 degrees or 1000 degrees F, depending on construction.

THERM-O-BESTOS - A waterproofed asbestos material of high insulating value used for building underground conduit systems designed to house hot lines.

THERMOBESTOS - A high temperature insulation, made from lime, diatomaceous silica, and asbestos fiber, for service up to 1200 degrees F.

Thermo FIRE FELT - Similar to Asbestos FIRE FELT, except that it has a cellular asbestos structure completely enclosed in the center of the sheet, giving it increased efficiency and resiliency; for temperatures up to 1000 degrees F.

VITRIBESTOS - Made of asbestos felts which have been corrugated and built up to form a cellular sheet, then vitrified to make them more resistant to moisture and high temperature. The vitrified product has lower insulating value than untreated products. Used for lining smokestacks and flues, building theater curtains, or wherever a strong, stiff product is required that will resist temperatures up to 800 degrees F.

Vitro FIRE FELT - Similar to Thermo FIRE FELT except that the cellular asbestos structure is vitrified to increase rigidity.

SECTIONAL PIPE INSULATION

85% Magnesia - See 85% Magnesia under SHEETS AND BLOCKS.

ANTI-SWEAT - Made from water-proof insulating paper and wool felt, it prevents condensation from cold water pipes by insulating the pipe from warm air.

AQUA Covering - Solid laminations of wool felt one-half inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

ASBESTOCEL - See ASBESTOCEL under SHEETS AND BLOCKS; in this design, the air channels run around the pipe instead of lengthwise, which prevents the circulation of air.

Air-Cell - See Air-Cell under SHEETS AND BLOCKS; in this design, the air channels run lengthwise, parallel to the pipe.

Asbestos "Navy Brand" FIRE FELT Covering - See Asbestos "Navy Brand" FIRE FELT under SHEETS AND BLOCKS.

Asbestos Air-Chamber Covering - Formed by layers of fire-proof Asbestos Lining Felt, Hair Felt, Asbestos Sheeting, and Canvas. An additional layer of Hair Felt and Asbestos Sheeting form Double Air Chamber.

Asbestos Combination Spiral Pipe Insulation - Consists of a layer of CEILINITE (see under PAPER, FELTS, BLANKETS) over which is wrapped a layer of asbestos listing. Used on irregular runs of pipe, or where severe vibration is encountered, as an automobile exhaust pipes and on locomotives; temperature limit of 1000 degrees F.

Asbestos FIRE FELT Covering - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos Molded Sectional Covering - See Asbestos Molded Blocks under SHEETS AND BLOCKS.

Asbestos Sectional Covering - composed of a fire-proof non-conducting lining of asbestos, surrounded by alternate layers of asbestos and non-conducting felt.

Asbestos Sponge Felted Sectional Covering - See Asbestos Felted under SHEETS AND BLOCKS.

Asbestos and Hair Felt Removable Covering - A form of Air Chamber Covering composed of standard hair felt with an inner layer of asbestos fiber of equal thickness, the whole enclosed in a strong wrapper or case of wool sheathing and a lining of asbestos sheathing.

Asbestos Hair Felt Covering - Consists of layers of Asbestos Hair Felt, composed of long fiber asbestos and cattle hair, built up on the pipe.

CHAMPION Sectional Covering - Solid laminations of wool felt three-quarters of an inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

EQUALITY - See EQUALITY under SHEETS AND BLOCKS.

EUREKA Covering - Made of one-quarter inch asbestos felt on the inside of the section, and the balance (three-quarters of an inch) of alternate layers of asbestos and wool felt.

EXPRESS Covering - Solid laminations of wool felt three-quarters of an inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

Fine Corrugated ASBESTOCEL - Similar to ASBESTOCEL, except the corrugations are smaller; however, there are 50% more laminations per inch of thickness and the additional small enclosed air cells provide greater efficiency.

High Temperature Insulation - See High Temperature Insulation under SHEETS AND BLOCKS.

INDENTED - Made up of several layers of pure indented Asbestos Felt, wire stitched together; the indentations cause air spaces to be formed between the layers, improving insulating efficiency.

MAGNO - See MAGNO under SHEETS AND BLOCKS.

METAL-ON - THERMOBESTOS pipe insulation with a factory applied jacket of aluminum; joints are sealed with special aluminum "snap-straps" and metal bands.

NATIONAL Sectional Covering - Composed of corrugated soft wool felt, lined on the inside and alternated for three layers with

asbestos lining felt; an economical covering for use on low pressure steam lines.

PERFECTION Sectional Covering - Composed of one-half inch indented wool felt wrapped around one-half inch rolled asbestos.

STANDARD Sectional Covering - Solid laminations of wool felt one inch thick with an interlining of two layers of asbestos paper. See Wool Felt Sectional Pipe Insulation.

SUPEREX 1900 - See SUPEREX 1900 under SHEETS AND BLOCKS.

SUPEREX-M - See SUPEREX-M under SHEETS AND BLOCKS.

Safety Blow-Off Covering - Protects boiler blow-off pipes against corrosion by hot gases and prevents explosions resulting from sudden changes of temperature when operating boilers.

Silicated THERMOBESTOS - See Silicated THERMOBESTOS under SHEETS AND BLOCKS.

THERM-O-BESTOS - See THERM-O-BESTOS under SHEETS AND BLOCKS.

THERMOBESTOS - See THERMOBESTOS under SHEETS AND BLOCKS.

VITRIBESTOS Covering - See VITRIBESTOS under SHEETS AND BLOCKS.

Wool Felt Sectional Pipe Insulations - An inexpensive insulation made of wool felt and asbestos paper. See STANDARD, EXPRESS, CHAMPION, and AQUA for more detail.

ASBESTOS MILLBOARD

ASBESTOS MILLBOARD (All Grades) - Made of asbestos fiber and suitable binders, this is recommended where relatively thin sheets or boards are required for protection against fire, heat, and acid fumes. Used as a fireproof lining for floors, partitions, ceilings, and elevator shafts. Also used in ranges, stoves, grates, etc. Made in various degrees of hardness and temperature resisting properties.

BOARD

ASBESTOS EBONY - A densely pressed hard sheet of asbestos fiber and binding cements, impregnated with an insulating compound and used for switchboards, controller plates, switch bases, etc. Has high dielectric strength, insulation resistance, strength, and durability.

DEKERAN - A mineral glaze surfacing with exceptional abrasion and stain resistance that is completely fireproof. Available on 3/16 Marine Veneer either plain or perforated.

Flat Transite - Incombustible asbestos-cement sheets, resistant to corrosion and weather.

MARINET 45 - A calcium silicate structural - insulating board for feeding and conveying nonferrous metals up to 1800 degrees F.

MARINITE - A composition of asbestos fiber, diatomaceous silica and lime formed with calcium silicate sheets which have structural strength, fire resistance, and insulating value; used as fire-safe wall partitions in ship construction and as a fireproof base for wood veneers; also used to construct industrial ovens and other insulating enclosures, for handling molten metals, as drying trays in dielectric core drying ovens, for back-up of electrotypes, printing mats, and for fireproof doors.

MARINITE 23 - The MARINITE panel with the best thermal insulating characteristics; recommended where strength and hardness are of secondary importance, in applications where the material is not subjected to direct abuse or where it serves as a core for veneering; the 23 indicates a density of 23 lbs. pcf.

MARINITE 30

MARINITE 36 - The MARINITE panel that provides the best combination of structural strength, surface hardness, and insulating value; recommended for most applications; the 36 indicates a density of 36 lbs. pcf.

MARINITE 65 - The MARINITE that is recommended where structural strength and surface hardness are of primary importance; the 65 indicates a density of 65 lbs. pcf.

MOLTEN METAL MARINITE - A board insulation made of amosite fiber, diatomaceous silica, and an inorganic binder; it is an ideal material for feeding and conveying molten metals up to 1350 degrees F. Also available as heat treated MOLTEN METAL MARINITE.

Marine Acoustical Unit - Square sections of perforated Marine Veneer with attached elements of sound-absorbing material; used for acoustical treatment in ship construction.

Marine Veneer - Strong, flexible, fire-resistant sheets made of asbestos and cement; used for low-maintenance ceilings and wall facings on ships.

Metal Veneered MARINITE

PALLITE - Sheet material formed from asbestos fiber and inorganic binder; used in drying operations in ceramic plants.

REEFERITE - An incombustible, corrosion-proof panel composed of a solid aluminum core faced on both sides with Marine Veneer.

Sugarine Bulkhead - Corrugated asbestos cement sheets used as bulkhead piling to control erosion along canals and inland waterways.

TRANSITE Acoustical Panel - A panel made of an asbestos-cement facing used in conjunction with a mineral fiber sound absorbing element.

TRANSITE Core Plate - Smoothly sanded, hydrothermally cured asbestos-cement board especially compounded to properly support cores during drying or baking; widely used in the manufacture of castings of brass, aluminum, gray iron, malleable iron, and steel.

Veneered MARINITE

FINISHES

AERTITE - An asphalt-asbestos coating for troweling over the outside of boiler walls.

INSULKOTE ET - A non water-vapor barrier, non-burning, weather proof coating for use over insulation where "breathing" is required.

INSULKOTE SG AND ST - Weatherproofing and vapor barrier coatings for insulations on refrigerated equipment. INSULKOTE SG is an excellent anti-corrosion coating.

PAPER, FELT, BLANKETS

#50 Asbestos Weatherproofing Felt - An asphalt-saturated asbestos felt used in waterproofing asphalt for work below grade.

#12 Asbestos Paper Tape - Paper tape made from 12 lb. asbestos paper, it is felted, composed of asbestos fiber and binder. It comes in 2 or 3 inch rolls, and is used to wrap duct joints and in many other applications.

15A Asbestos Jacket - A lightweight asphalt-saturated asbestos finishing felt.

45A Asbestos Jacket - An asphalt saturated asbestos felt with a sand finish; a heavy, long life weatherproofing jacket.

7700 Coated Asbestos Jacket - An asphalt-saturated and coated asbestos felt with a smooth outer surface, it is designed to be given a field coating of asphalt.

ARMATURO Asbestos Paper - An asbestos paper integrally reinforced with cotton-scrim cloth; used as an insulation in electrical equipment; temperature limit is 500 degrees F.

ARP-12 - Asbestos reinforced plastic used as the fabric for KLAD INTERLOK and in other aircraft and missile applications; when furnished in tape form, called ARP Tacky Tape.

ASBESTOCEL Paper - A corrugated paper formed of successive corrugations of an asbestos felt, held together by an asbestos fireproof backing.

Asbestos Corded Sheathing - Consists of pure Asbestos Sheathing, to the surface of which are attached loosely twisted rolls of asbestos, forming a very strong fabric about one-quarter of an inch thick. It is particularly valuable as a fire-proof, non-conductive covering for furnaces, furnace pipes, and other fire-heated surfaces, etc.

Asbestos FIRE FELT - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos FIRETARD - A fire-retardant weatherproof jacket consisting of a sheet of asphalt-saturated asbestos felt cemented to a sheet of unsaturated asbestos felt; used on outdoor pipe insulation and small diameter vessels wherever fire hazards are present.

Asbestos Felt - Composed entirely of pure asbestos, is fireproof, and possesses three times the strength of hair felt.

Asbestos Jelly Rolls - Made of Asbestos Roll FIRE FELT, these are used to pack boiler and still-setting expansion joints.

Asbestos Lining Felt - This material consists of pure Asbestos Sheathing, to one side of which is attached a layer of "flocked" or felted asbestos, forming a strictly fireproof, non-conducting lining for hair felt, protecting it from the injurious effects of heat when applied to steam pipes, boilers, etc.

Asbestos Lining and Deadening Felt - Same as Asbestos Lining Felt; also used for lining floors, walls, etc., to deaden sound.

Asbestos Locomotive Lagging - Composed of large strands or twisted rolls of pure asbestos, woven in a fine asbestos warp, and lined with a pure Asbestos Sheathing, forming a strong, matted, felt-like material of great non-conducting power.

Asbestos Pipe Blanket - Made of asbestos cloth, filled with asbestos fiber and quilted; for pipes, fittings and flanges where inspection is made frequently and necessitates removal of the insulation; the asbestos cloth used is special to suit each temperature and service condition up to 950 degrees F.

Asbestos Roll FIRE FELT - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos Sheet -

Asbestos Sponge Felt - A thin felt, composed of asbestos fiber and particles of finely ground spongy material forming an extremely cellular felt for temperatures up to 700 degrees F.

Asbestos Sponge Hair Felt - Composed of asbestos sponge and hair, it forms a good covering for steam pipes, boilers, mining purposes, etc.; it is very elastic, and owing to the large proportion of asbestos, is not liable to injury from steam heat.

Asbestos Turbine Blanket - Consists of high temperature felted mineral insulation fully enclosed in a wire inserted asbestos cloth for temperature exposure to 850 degrees F, or a stainless steel mesh for temperatures from 850 degrees F to 1100 degrees F.

Asbestos and Hair Woven Felt - Similar to Asbestos Locomotive Lagging, but contains 25% hair; it is very elastic and practically fire-proof.

CELLINITE - Made from Asbestos Roll FIRE FELT, reinforced on one side with asbestos cloth; used as an inter-lining, for fireproofing electrical apparatus such as switch boxes, and for similar purposes requiring a strong, flexible, fireproof felt; for temperatures up to 1000 degrees F.

Commercial Grade Asbestos Paper - A standard asbestos paper varying in weight from 6 to 32 lbs. per 100 sq. ft. and in thicknesses from .015 to .0625 inches. Asbestos paper is formed from asbestos fiber and a suitable binder and used where an insulating material of minimum thickness is required.

D.C. FLEXSTONE - A high quality asbestos felt, saturated and coated with asphalt on both sides; used to make weather-proof jackets for insulated pipe lines located outdoors.

DOUBLEX Asbestos Paper - A paper made from asbestos and a lime silicate binder used by neon sign manufacturers to make templates or patterns; also used for pouring gates in foundries.

Engineers Insulating Tape

FIBROID Asbestos Paper - Used as an electrical insulation; made from asbestos paper and a binder, it can withstand temperatures up to 500 degrees F.

High Temperature Flexible MIN-K Blankets - See Flexible MIN-K under SHEETS AND BLOCKS.

High Strength FIBROID Asbestos Paper - See FIBROID Asbestos Paper; can be used for service up to 600 degrees F.

Long Fiber Asbestos Paper - Made with high grade long asbestos fibers; for use as a thermal insulation, gasketing, or as a base sheet for saturating; minimum fiber content 88%.

MICROBESTOS - A high grade chrysotile asbestos paper which can be readily saturated with various resins to provide a very uniform prepreg reinforcing material; for use in the manufacture of reinforced plastic products and in the oblativ field.

MIN-KLAD - A molded combination of MIN-K and asbestos reinforced plastic faces.

NIAGRITE - A felted asbestos tape for wrapping around electrical cables as fireproofing; usually reinforced with burlap or asbestos cloth.

Non-Burn Asbestos Paper - A medium length fiber paper with high fiber content; suitable for continuous service at 400 degrees F.

Standard Flexible MIN-K Blankets - See Flexible MIN-K under SHEETS AND BLOCKS.

Super FIRE FELT - See Super FIRE FELT under SHEETS AND BLOCKS.

THERMO FELT - An asbestos hair felt composed of 50% cattle hair and 50% asbestos, with a burlap center; used in steel passenger cars and street cars.

THERMOMAT - A nonwoven long fiber asbestos felt saturated with phenolic resin; furnished as a molding compound in sheet or tape form; extremely resistant to high temperatures; used as a rocket motor liner and in other aviation and missile applications.

THERMOTAPE - A flexible pipe insulation in strip or roll form made of an asbestos pad in a neoprene coated asbestos cloth jacket; used on locomotives and cars where sectional insulation can't be applied effectively.

THERMOWRAP - A pipe insulation made up of a blanket of asbestos fibers held together by asbestos yarns and enclosed in a neoprenecoated asbestos jacket; primarily designed for steam lines on trains; High Temperature THERMOWRAP is designed for use on diesel exhaust lines and in similar high temperature situations.

Welding Paper

White Surface Asbestos Jacket - A pipe insulation jacket made from asbestos weatherproof felt.

SEALING COMPOUNDS

Sealing Compounds are plastic, putty-like materials for sealing out or in, air, dust, moisture, etc. The products and their main sealing uses follow.

ALBASEAL - Air conditioners, refrigeration equipment.

AQUASEAL - Threaded or jacketed joints.

BRANCHITE - Sewer Pipe connections.

Body Sealer - Auto, truck, and trailer bodies.

DUXSEAL - Wires and cables at duct entrances; general purpose.

H-NAVASEAL - Electrical duct apertures aboard ship; a heat (H) resistant, practically incombustible sealer for Navy applications.

HF-NAVASEAL - Electrical duct apertures aboard ship; a heat and flame (HF) resistant, practically incombustible sealer for Navy applications.

Industrial Vent Caulking

NODRSEAL - Refrigeration equipment and general purpose.

Stove Putty - Ovens and hot-water heaters where it is not apt to be exposed to intense heat.

TRANOSEAL - Oil filled electrical transformers.

Type T NODRSEAL - Refrigeration equipment and general purpose.

UNISEAL - General purpose.

CEMENTS

0352 Cement - General utility short fiber cement, used by the plumbing and steamfitting trade for insulating heating boilers and pipe fittings; temperature limit 1000 degrees F.

300 Cement

301 Cement

302 Cement - An excellent finishing cement made from asbestos fibers and binding materials, it is light in weight and has an insulating value; temperature limit 1000 degrees F.

304 Cement - Insulating cement made from long fiber asbestos for covering surfaces liable to become red hot; temperature limit 1200 degrees F.

319 Semi-Refractory Cement - A combined insulating and semi-refractory cement used to protect block or brick insulation in flues, stacks, etc.; temperature limit 1600 degrees F.

329 Cement - A lagging cement for finishing over sheets and blocks, for insulating large heated surfaces and for irregular surfaces and fittings, where it is impossible to apply either sectional pipe covering or blocks. It is very light, full of confined air, elastic and spongy, and forms an excellent plastic non-conductor.

340 Cement - An insulating and finishing cement lower in covering capacity and price than the 302 Cement; temperature limit 1000 degrees F.

352 Cement - General utility short fiber cement, used in large quantities by the plumbing and steamfitting trades for insulating heating boilers and pipe fittings; used as a finish over block insulation and in general applications; temperature limit 1000 degrees F.

364 Cement - A medium grade insulating cement; temperature limit 1000 degrees F.

400 Cement - A combination of asbestos and other material of high insulating value, ideal for general use where efficiency, strength, and durability are desired; temperature limit 700 degrees F.

450 Cement - A mineral wool base insulating cement with excellent adhesion which permits it to be readily applied to surfaces too irregular to insulate with sheets or blocks; adheres to hot or cold surfaces but is not a finishing cement; temperature limit 1200 degrees - 1500 degrees F.

500 Cement - A cement composed of asbestos fiber and expanded mica which combines high covering capacity and heat resistance with good working qualities. Can be used at temperatures up to 1800 degrees F if entire reclaimability is not essential. Completely reclaimable at temperatures up to 1500 degrees F. Useful for irregular surfaces where block insulation is not adaptable, but not ordinarily used for finishing.

678 Semi-Refractory Cement - An air-setting, hydraulic cement which is a combination finishing and semi-refractory cement for use as a protective coating over block insulation linings exposed to the action of moving gases in flues, breechings, and stacks. Where erosive action is severe such as in pulverized coal units and particularly in area where the gases change direction sharply, the cement should be protected with temperature resistant metal; temperature limit 1900 degrees F.

85% Magnesia Cement - Composed of the same material as 85% Magnesia sectional and block insulation, it is essentially an insulating and not a finishing cement; temperature limit 600 degrees F.

ASBESTILE Cement - A heavy bodied cement of asbestos fibers, asphalt, and other mineral ingredients; specifically designed for sealing flashings with a watertight bond.

ASBESTOMENT - A refractory powder which when mixed with water produces an outer coating on the fireproofing of electrical cables; usually used with NIAGRITE.

FIBROFIL - A mixture of diatomaceous silica and asbestos fibers; used as an insulating fill for irregular spaces.

FIREITE Furnace Cement - An asbestos compound for mounting, sealing, and repairing joints in stoves, boilers, furnaces, heaters, and ranges.

Fibrous Adhesive - A strong silicate soda and asbestos fiber cement used for temporary bonding of insulation to brick, concrete, metal, or other surfaces as well as for bonding prefab fittings; temperature limit 500 degrees F.

Fil Insul - A resilient fill composed of mineral fibers; used for insulating irregular surfaces.

Heat Treating Cement - A ready-mixed refractory cement for use in the heat treating of high carbon steel parts; for temperatures up to 2500 degrees F.

LAPTITE Cement - A heavy brushing fibrated cut-back asphaltic cement with a temperature limit of 140 degrees F. Used for sealing the laps of weatherproof insulating jackets.

MX-3808 Asbestos Filler

Navy 450 Cement - A specially formulated variation of 450 Cement to meet Navy specifications.

SUPEREX Cement - The same material as used in SUPEREX sectional and block insulation; used with SUPEREX or THERMO-12 pipe and block

insulation for patching, pointing up joints, and covering irregular shapes.

SUPEREX Cement for Navy - A specially formulated variation of SUPEREX Cement to meet Navy specifications.

THERMOBESTOS Cement - The same material used in THERMOBESTOS sectional and block insulation.

THERMOMIX 700, 720, 770, 810 - Insulating cements designed for use in missile engines; these compounds contained a special heat resistant phenolic resin system of the dry type.

C.18. During the years that your company manufactured and/or sold asbestos containing materials, did your company prepare and/or publish any sales or promotional literature which depicted and described these products? If so, describe the particular literature which your company prepared and indicate the information the literature contained. Describe who has custody of this literature at the present time.

ANSWER: All such sales or promotional literature for Manville Corporation or related entities in the possession, custody or control of the Fund is located at the records repository in Denver, Colorado, and will be made available for inspection and copying at a time convenient to the parties. In addition to the documents which will be specifically identified and produced at that time, there may be additional documents responsive to this Interrogatory among the general collection of documents in the repository. This collection of documents will be made available to Plaintiff for review at a time agreed upon by the parties. See Answer to Interrogatory No. 39.

C.19. Has your company manufactured asbestos containing products and materials which were distributed by another entity or corporation under their name or trademark? If so, identify each such entity which sold or distributed these products, indicate which of your company's products this company marketed and indicate the inclusive dates that this particular commercial arrangement existed.

ANSWER: The Fund has been unable to identify products which were manufactured by Manville Corporation or related entities but which were sold by other companies.

C.20. Has your company marketed under its own name or trademark any asbestos containing insulation products which were manufactured by another corporation? If so, identify each and every product which your company marketed which was manufactured by another corporation, indicate the inclusive dates that you marketed each product and describe the name, trade name and generic name of each such product which your company marketed.

ANSWER: Manville Corporation or related entities have, on occasion, marketed products manufactured by other companies.

Raybestos-Manhattan, Nippon Asbestos Co. (Tokyo) and Johns Asbestos Company manufactured asbestos cloth and asbestos tape marketed under the Johns-Manville logo from approximately 1969 through 1974.

Additionally, in 1969, Manville or related entities entered into an agreement with Raybestos-Manhattan, Inc., whereby Manville agreed to market profile calendar brake linings manufactured by Raybestos-Manhattan, Inc. under the style designations HF, SF, and MF.

Manville or related entities also sold Corrugated Transite, a roofing/sheet product made by GAF, from 1972 through 1977.

The Fund has been unable to identify any other products which were sold by Manville or related entities but which were produced by other companies.

C.21. Were any of the asbestos containing insulation products that defendant sold or distributed into the stream of commerce accompanied by written instructions or package inserts? If so, indicate which such products were provided with such instructions and package inserts, indicate when each product was accompanied by these materials, state the substance of what the instructions or package inserts stated and annex copies of same hereto.

ANSWER: On a continuing basis, Manville Corporation or related entities furnished customers information as to the proper use and application of its insulating products, and directly or indirectly advised industrial insulation contractors to utilize ventilation equipment, such as respirators, at the sites where finished insulation products were being worked with and applied. Those respirators which have been recommended were approved by the federal government for use as protection against asbestos.

Manville Corporation or related entities also affixed caution instructions to products regarding the handling of these products. See response to Interrogatory No. B.19. In addition, Manville's product literature contained recommendations regarding respirator usage and utilization of adequate dust collection systems when fabricating, handling and applying certain asbestos containing materials.

Manville Corporation or related entities participated in and contributed to the informational and educational program of the National Insulation Manufacturers Association (NIMA). This program

was designed to educate the insulation contractors' industry with respect to the health aspects of exposure to asbestos.

To this end, NIMA sponsored a number of regional meetings to aid contractors in minimizing or eliminating the inhalation of asbestos fibers by those who worked with, installed or applied asbestos containing thermal insulation products. In 1967 and 1968, approximately eight hundred insulation contractors attended these regional meetings.

Approximately three hours in length, these programs included a review of: 1) the biological effects of exposure to asbestos; 2) the threshold limit value for asbestos; 3) methods for evaluating concentrations of dust; and 4) engineering and method recommendations designed to assist the contractors in dust abatement and environmental control.

The highlights of these presentations were published in several booklets prepared by NIMA. One such booklet, entitled "Recommended Safe Practices for Handling and Applying Thermal Insulation Products Containing Asbestos," printed May 1, 1968, was written by members of the NIMA Education and Information Committee. This booklet was distributed during the 1968 meetings. In addition, the booklet was distributed to customers, employees and other interested parties.

The chairman of the NIMA Education and Information Committee was Clifford L. Sheckler, who, at that time, was Manager, Accident Prevention and Health Administration at Manville. Other members of the committee included John Vyverberg, Owens-Corning Fiberglass Corporation; Harry Mesler, Ruberoid Company; Leon Horowitz, Certain-Teed Corporation; and Jack Barnhart, Executive Secretary of NIMA.

Manville Corporation or related entities also distributed the following materials to employees who were exposed to asbestos or asbestos containing products in the course of their employment:

An employee notification form entitled "Dear Johns-Manville Employee" reminded employees of the risks associated with asbestos exposure. This was inserted in paychecks of all employees at all Johns-Manville Sales Corporation contract units beginning in 1970.

A pamphlet entitled "Safe Work Manual" published by Johns-Manville Corporation in 1971.

A booklet entitled "What Every Employee Should Know About Asbestos" published by Johns-Manville Corporation in 1973. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A pamphlet entitled "Recommended Safety Practices for Handling Asbestos Fiber" published by Johns-Manville Corporation in November 1973. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A booklet entitled "What You Should Know Asbestos and Health" published by Johns-Manville Corporation in January 1975. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A booklet entitled "Before You Begin" published by Johns-Manville Corporation in 1976 and designed to be given to prospective employees before beginning work in an asbestos-using operation.

A booklet entitled "Questions and Answers Concerning Asbestos" published by Johns-Manville Corporation in 1982.

In 1976, Manville Corporation or related entities began to publish a Catalog of Occupational Environmental Health and Safety Programs as listed below. All of the publications, audio-visual programs and other material listed in this catalog were made available to Manville customers and public interest groups as well as to all Manville personnel.

A pamphlet entitled "Occupational Health Guide - Asbestos" published by Johns-Manville Corporation in 1976. This guide was designed as a reference for supervisory personnel.

A 25-minute slide/tape presentation on industrial hygiene programs at Manville.

A 20-minute slide/tape program on health aspects of working with asbestos.

A 25-minute motion picture on occupational health risks associated with asbestos fiber.

A newspaper entitled "The Asbestos Report" published by Johns-Manville Corporation in 1976.

In 1980, Manville Corporation or related entities published the 1980-1981 edition of the Health, Safety and Environment Catalog which, in addition to the above, included:

"A Study of the Problem of Asbestos in Water," which was a reprint of a report by the American Water Works Association Research Foundation. This report was the result of intensive

study and literature search and covered all aspects of the use and safety of asbestos-cement pipe materials.

"Asbestos Facts," published by Johns-Manville Corporation, was a series of one-page fact sheets covering various aspects of the asbestos and health issue.

"Asbestos Minerals in Modern Technology," published by Johns-Manville Corporation, was a comprehensive review of mineralogy.

"Does Asbestos-Cement Pipe Pose a Health Hazard?" This reprint of an article in California Builder & Engineer discussed the health questions regarding the use of asbestos-cement pipe.

"Dust Control Techniques in the Asbestos Industry," published by Johns-Manville Corporation, summarized engineering efforts at Manville to control the emission of asbestos in mining, milling and manufacturing operations.

"The Asbestos Issue: A Matter of Principle," published by Johns-Manville Corporation in 1979, reported on issues related to asbestos health concerns and covered research efforts, Manville health programs and actions.

"Today: Special Asbestos Update," published by Johns-Manville Corporation, covered asbestos policy, benefits and applications, types of diseases and groups affected.

Manville Corporation or related entities cooperated with the Asbestos Information Association in the production of the following booklets:

"Recommended Work Practices - Molding and Fabrication of Asbestos-Containing Plastic Products."

"Recommended Work Practices - Fabrication and Use of Asbestos Friction Materials."

"Recommended Work Practices - Fabrication and Use of Asbestos Paper Products."

"Recommended Work Practices - Shop and Field Fabrication of Asbestos Sheet Products."

"Recommended Work Practices - Use and Handling of Asbestos Textile Products."

Additionally, Manville Corporation or related entities participated in 1971 through the Occupational Health and Safety

Committee of the National Insulation Contractors Association in the preparation of a booklet entitled "Safety Reminders."

Over the years, Manville Corporation or related entities also produced, published or distributed for use by employees a number of booklets which addressed a number of different safety and health issues in Manville operations. Many of these booklets addressed safe work practices to minimize exposure to dust.

In addition, until Manville Corporation or related entities ceased manufacturing asbestos containing materials, there were many oral presentations and meetings at the plant level concerning safety practices related to asbestos exposure.

Respectfully submitted,

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Attorneys for Manville
Corporation Asbestos
Disease Compensation Fund

AFFIDAVIT

I, DAVID T. AUSTERN, being of full age and first duly sworn, depose and state that I am GENERAL COUNSEL of the Manville Corporation Asbestos Disease Compensation Fund, a defendant in this action; that I am authorized to make this affidavit on its behalf; that the matters stated in the foregoing Answers to Interrogatories are not within my personal knowledge; that I am informed that no single official, employee, or former employee of either the Fund or of Manville Corporation has personal knowledge of all such matters; that information contained herein has been compiled at my direction by counsel for the Fund, and the responses are in accordance with the information available to them; and that the answers are true and correct, insofar as it is possible to verify them.

Further affiant sayeth naught.

David T. Austern

Subscribed and sworn to
before me this 7th day of
December, 1989.

Larry Anton

NOTARY PUBLIC

My Commission Expires March 10, 1994

Exhibit "A"

Manville Asbestos Containing Thermal
Insulation or Shipyard Products

Product Name: #12 Asbestos Paper Tape
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0
Date Manufactured: 1936
Date Discontinued: 1980
Date Labeled: None

Product Name: 15A Asbestos Jacket
Product Type: Paper, Felt
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 57.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: None

Product Name: 45A Asbestos Jacket
Product Type: Felt, Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: None

Product Name: #50 Asbestos Weatherproofing Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 55.0
Date Manufactured: 1923
Date Discontinued: 1976
Date Labeled: 1970

Product Name: 55 Cable Fireproofing Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 72.0
Date Manufactured: 1956
Date Discontinued: 1982
Date Labeled:

Product Name: 85% Magnesia
Product Type: Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.3 - 15.0
Date Manufactured: 1902
Date Discontinued: 1970
Date Labeled: 1964

Product Name: 85% Magnesia Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.3 - 15.0
Date Manufactured: 1902
Date Discontinued: 1970
Date Labeled: 1965

Product Name: 88 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 58.0
Date Manufactured: 1960
Date Discontinued: 1983
Date Labeled: None

Product Name: 89 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 58.0
Date Manufactured: 1955
Date Discontinued: 1983
Date Labeled: None

Product Name: 91 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 61.0
Date Manufactured: 1957
Date Discontinued: 1983
Date Labeled: None

Product Name: 95 (1/16) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 32.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 95 (1/8) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 19.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 96 (1/16) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 25.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 96 (1/8) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 18.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 (1/32, 3/32) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 45.0
Date Manufactured: 1903
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 (1/16, 1/4) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 39.0
Date Manufactured: 1903
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 Asbestos Millboard (Hard)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 69.2 - 78.5
Date Manufactured: 1910

Date Discontinued: 1951
Date Labeled: None

Product Name: 102 Asbestos Millboard (Medium)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 86.6
Date Manufactured: 1910
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 103 Asbestos Millboard (Soft)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 76.0 - 90.0
Date Manufactured: 1910
Date Discontinued: 1951
Date Labeled: None

Product Name: 104 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 92.8
Date Manufactured: 1915
Date Discontinued: 1951
Date Labeled: None

Product Name: 105 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 77.0 - 92.8
Date Manufactured: 1915
Date Discontinued: 1951
Date Labeled: None

Product Name: 106 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 70.0 - 91.2
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 106B Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile

% Fiber by Weight: 95.0
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 106H Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 87.0 - 88.0
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 135 Tadpole Gasketing Tape
Product Type: Tape
Fiber Type:
% Fiber by Weight: 36.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled: None

Product Name: 135-S Tadpole Gasketing Tape
Product Type: Tape
Fiber Type:
% Fiber by Weight: 36.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled: None

Product Name: 219 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 84.0 - 86.8
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 300 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 100.0
Date Manufactured: 1932
Date Discontinued: 1970
Date Labeled: None

Product Name: 301 Cement

Product Type: Cement
Fiber Type: Chrysotile
Fiber by Weight: 14.7 - 18.6
Date Manufactured: 1965
Date Discontinued: 1971
Date Labeled: 1965

Product Name: 302 Cement (Originally called Asbestos Cement
Felting; later known as Fire Felt Insulating Cement)
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 49.4 - 70.0
Date Manufactured: 1858
Date Discontinued: 1970
Date Labeled: 1965

Product Name: 304 Cement (Asbestos Hot Blast Cement)
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 53.4
Date Manufactured: 1884
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 319 Semi-Refractory Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 20.0 - 21.0
Date Manufactured: 1925
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 320 Cement
Product Type: Cement
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight:
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: 329 Cement
Product Type: Cement
Fiber Type:
% Fiber by Weight:
Date Manufactured: 1890
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: 040 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 60.0
Date Manufactured: 1908
Date Discontinued: 1969
Date Labeled: None

Product Name: 0352 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 25.0 - 40.0
Date Manufactured: 1931
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 352 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 100.0
Date Manufactured: 1923
Date Discontinued: 1973
Date Labeled: 1965

Product Name: 364 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 60.0
Date Manufactured: 1908
Date Discontinued: 1955
Date Labeled: None

Product Name: 400 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 21.6 - 23.0
Date Manufactured: 1915
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 450 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 7.1 - 38.5
Date Manufactured: 1930

Date Discontinued: 1971
Date Labeled: 1965

Product Name: 500 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 16.7 - 20.0
Date Manufactured: 1933
Date Discontinued: 1971
Date Labeled: 1965

Product Name: 678 Semi-Refractory Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 20.0 - 35.0
Date Manufactured: 1941
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 7700 Coated Asbestos Jacket
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 24.0 - 26.0
Date Manufactured: 1931
Date Discontinued: 1983
Date Labeled: None

Product Name: AAAA Grade
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAAA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1970
Date Labeled: None

Product Name: AAAA Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile

% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAA Grade (788, 857, 869, 873)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AAA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: AAA Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAA Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: AA Grade Asbestos Tape

Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1981
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AA Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: A Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 85.0 - 90.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: A Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 85.0 - 90.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AERTITE
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 14.7 - 18.0
Date Manufactured: 1920
Date Discontinued: 1982
Date Labeled: None

Product Name: Air-Cell (Generic name for ASBESTOCEL)
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1908
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: ALBASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 40.0
Date Manufactured: 1953
Date Discontinued: 1975
Date Labeled: None

Product Name: ANTI-SWEAT
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 72.0
Date Manufactured: 1903
Date Discontinued: 1965
Date Labeled: None

Product Name: ARMATURO Asbestos Paper (Insulating Jacket)
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 84.0 - 97.0
Date Manufactured: 1920 - 1924
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: ARP-40 (Insulating Jacket)
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 60.0
Date Manufactured: 1963
Date Discontinued: 1971 - 1975
Date Labeled: Unknown

Product Name: Asbestica Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled:

Product Name: ASBESTILE Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 8.2 - 21.8
Date Manufactured: 1930
Date Discontinued: 1982

Date Labeled: None

Product Name: ASBESTOCEL
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1902
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: ASBESTOCEL Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1902
Date Discontinued: 1924 - 1931
Date Labeled: None

Product Name: ASBESTOCITE
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0 - 45.0
Date Manufactured: 1927
Date Discontinued: 1975
Date Labeled: 1970

Product Name: ASBESTOMENT
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 6.0
Date Manufactured: 1923
Date Discontinued: 1970
Date Labeled: None

Product Name: Asbestos Air Chamber Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not Available
Date Manufactured: 1880
Date Discontinued: 1893 - 1895
Date Labeled: None

Product Name: Asbestos and Hair Felt Removable Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available

Date Manufactured: 1891
Date Discontinued: 1896 - 1900
Date Labeled: None

Product Name: Asbestos and Hair Woven Felt (Originally called
Asbestos and Hair Lagging)
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1884
Date Discontinued: 1890
Date Labeled: None

Product Name: Asbestos Combination Spiral Pipe Insulation
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1931
Date Discontinued: 1934 - 1936
Date Labeled: None

Product Name: Asbestos Corded Sheathing
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1887
Date Discontinued: 1896 - 1900
Date Labeled: None

Product Name: ASBESTOS EBONY
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 47.0 - 75.0
Date Manufactured: 1911
Date Discontinued: 1984 - 1985
Date Labeled:

Product Name: Asbestos Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1890
Date Discontinued: 1890 - 1891
Date Labeled: None

Product Name: Asbestos FIRE FELT

Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 61.0 - 83.0
Date Manufactured: 1901
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos FIRE FELT
Product Type: Sheet/ Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos Fire Felt Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 41.0 - 61.5
Date Manufactured: 1891
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos Fire Felt Locomotive Lagging
Product Type: Sheet/ Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1903 - 1906
Date Labeled: None

Product Name: Asbestos FIRETARD
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 88.9 - 92.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: 1970

Product Name: Asbestos Hair Felt Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1911 - 1915
Date Labeled: None

Product Name: Asbestos Jelly Rolls
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 90.0
Date Manufactured: 1930
Date Discontinued: 1968
Date Labeled: None

Product Name: Asbestos Lining and Deadening Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1903 - 1906
Date Labeled: None

Product Name: Asbestos Lining Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1871 - 1877
Date Discontinued: 1900
Date Labeled: None

Product Name: Asbestos Locomotive Lagging (Originally called
Asbestos Lagging)
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1884
Date Discontinued: 1900
Date Labeled: None

Product Name: Asbestos Millboard (In Hard, Medium and Soft Grades)
Product Type: Sheet
Fiber Type:
% Fiber by Weight: Not available
Date Manufactured: 1896
Date Discontinued: 1910
Date Labeled: None

Product Name: Asbestos Millboard (Originally called Asbestos
Board)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: Not available

Date Manufactured: 1871 - 1875
Date Discontinued: 1896
Date Labeled: None

Product Name: Asbestos Molded Blocks
Product Type: Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Asbestos Moulded Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1891
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Asbestos "Navy Brand" FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1902
Date Discontinued: 1915 - 1925
Date Labeled: None

Product Name: Asbestos "Navy Brand" FIRE FELT Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1902
Date Discontinued: 1915 - 1925
Date Labeled: None

Product Name: Asbestos Pipe Blanket
Product Type: Blankets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 98.0 - 99.0
Date Manufactured: 1898
Date Discontinued: 1960
Date Labeled: None

Product Name: Asbestos Roll FIRE FELT
Product Type: Felt, Blankets

Fiber Type: Chrysotile
% Fiber by Weight: 91.0 - 99.0
Date Manufactured: 1891
Date Discontinued: 1900
Date Labeled: 1970

Product Name: Asbestos Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1888
Date Discontinued: 1890
Date Labeled: None

Product Name: Asbestos Sheathing
Product Type: Sheet
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not Available
Date Manufactured: 1869
Date Discontinued:
Date Labeled:

Product Name: Asbestos Sponge Hair Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1893
Date Discontinued: 1900 - 1903
Date Labeled: None

Product Name: Asbestos Sponge Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 68.0 - 96.2
Date Manufactured: 1890
Date Discontinued: 1961
Date Labeled: None

Product Name: Asbestos Sponge (Felted, Sectional, Molded)
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1890
Date Discontinued: 1953 - 1959
Date Labeled: None

Product Name: Asbestos Steam Packing
Product Type: Rope
Fiber Type:
% Fiber by Weight: Not Available
Date Manufactured: 1871
Date Discontinued:
Date Labeled:

Product Name: Asbestos Turbine Blanket
Product Type: Paper, Felt, Blankets
Fiber Type: Amosite
% Fiber by Weight: 98.0 - 99.0
Date Manufactured: 1951
Date Discontinued: 1977
Date Labeled: 1971

Product Name: Besto-Tak
Product Type: Tape
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: 75.0 - 100.0
Date Manufactured: 1959 - 1963
Date Discontinued: 1975 - 1978
Date Labeled: 1972

Product Name: Body Sealer
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 37.0 - 41.0
Date Manufactured: 1954
Date Discontinued: 1975
Date Labeled: None

Product Name: BRANCHTITE
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured: 1954
Date Discontinued: 1974
Date Labeled: None

Product Name: C Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 60.2 - 67.6
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: CELLINITE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 98.0
Date Manufactured: 1910
Date Discontinued: 1973
Date Labeled: 1970

Product Name: CELLAMITE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight:
Date Manufactured: 1939 - 1947
Date Discontinued: 1959 - 1963
Date Labeled: None

Product Name: CHAMPION Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: Commercial Grade (566, 702, 733, 787)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Commercial Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Commercial Grade Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0
Date Manufactured: 1929

Date Discontinued: 1980
Date Labeled: 1970

Product Name: Commercial Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1970

Product Name: Commercial Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: D.C. FLEXSTONE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 30.0 - 85.0
Date Manufactured: 1929
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: DEKERAN
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 29.6 - 34.6
Date Manufactured: 1963
Date Discontinued: 1975
Date Labeled: 1970

Product Name: DOUBLEX Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 80.0
Date Manufactured: 1936
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: DUXSEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile

% Fiber by Weight: 52.5 - 69.0
Date Manufactured: 1934
Date Discontinued: 1982 - Asbestos Content
Date Labeled: None

Product Name: Engineers Insulating Tape
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1926
Date Discontinued: 1956
Date Labeled: None

Product Name: EQUALITY
Product Type: Sheet/Block
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: EUREKA Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: EXPRESS Covering (See Wool Felt Sectional Pipe
Insulation)
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: FIBROFIL
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 30.0
Date Manufactured: 1940
Date Discontinued: 1969
Date Labeled: None

Product Name: FIBROID Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 25.0
Date Manufactured: 1911
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: Fibrous Adhesive
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 14.0 - 20.0
Date Manufactured: 1887
Date Discontinued: 1981 - Asbestos Content
Date Labeled: None

Product Name: FIL-INSUL
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 70.0 - 80.0
Date Manufactured: 1930
Date Discontinued: 1969
Date Labeled: None

Product Name: Fine Corrugated ASBESTOCEL
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1923
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: FIREITE Furnace Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 1.8 - 3.7
Date Manufactured: 1924
Date Discontinued: 1973
Date Labeled: None

Product Name: Flat TRANSITE
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 22.0 - 69.2
Date Manufactured: 1907
Date Discontinued: 1985
Date Labeled: 1970

Product Name: FLEXBOARD
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0 - 50.0
Date Manufactured: 1927
Date Discontinued: 1983
Date Labeled: 1970

Product Name: Flexible MIN-K
Product Type: Sheet
Fiber Type: Amosite
% Fiber by Weight: 20.0
Date Manufactured: 1963
Date Discontinued: 1975
Date Labeled: 1970

Product Name: Heat Treating Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 1.0
Date Manufactured: 1954
Date Discontinued: 1973
Date Labeled: None

Product Name: High Strength FIBROID Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 85.7 - 88.0
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: High Temperature Flexible MIN-K Blankets
Product Type: Blankets
Fiber Type: Amosite
% Fiber by Weight: 20.0
Date Manufactured: 1963
Date Discontinued: 1974
Date Labeled: 1970

Product Name: High Temperature Insulation
Product Type: Block, Pipe Covering
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1924

Date Discontinued: 1926
Date Labeled: None

Product Name: AF-NAVASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 27.0
Date Manufactured: 1955
Date Discontinued: 1975
Date Labeled: None

Product Name: H-NAVASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 48.0
Date Manufactured: 1951
Date Discontinued: 1975
Date Labeled: None

Product Name: INDENTED
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1924
Date Labeled: None

Product Name: Industrial Vent Caulking
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 53.0
Date Manufactured: 1957
Date Discontinued: 1974
Date Labeled: None

Product Name: INSULKOTE ET
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 11.7 - 15.5
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: INSULKOTE SG
Product Type: Finishes
Fiber Type: Chrysotile

% Fiber by Weight: 14.7 - 16.7
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: INSULKOTE ST
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 6.2 - 21.0
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: LAPTITE
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 10.0 - 16.9
Date Manufactured: 1938
Date Discontinued: 1954
Date Labeled: None

Product Name: Long Fiber Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 88.0 - 98.5
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: MAGNO
Product Type: Sheet/Block
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: MARIMET 45
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 43.0 - 44.0
Date Manufactured: 1970
Date Discontinued: 1985
Date Labeled: 1970

Product Name: MARINITE

Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 40.0 - 50.0
Date Manufactured: 1936
Date Discontinued: 1949 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 23
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 25.0 - 27.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 30
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 49.7 - 50.0
Date Manufactured: 1949
Date Discontinued: 1970
Date Labeled: None

Product Name: MARINITE 36
Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 29.7 - 57.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 65
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 55.5 - 70.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: Marine Acoustical Unit
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0
Date Manufactured: 1941
Date Discontinued: 1975-78
Date Labeled: 1970

Product Name: Marine Veneer
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 31.0 - 51.0
Date Manufactured: 1938
Date Discontinued: 1985 - Asbestos content
Date Labeled: 1970

Product Name: Metal Veneered MARINITE
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 15.0 - 40.0
Date Manufactured: 1951
Date Discontinued: 1973
Date Labeled: 1970

Product Name: METAL-ON
Product Type: Jackets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1959
Date Discontinued: 1974
Date Labeled: 1966

Product Name: MICROBESTOS
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 40.0 - 97.0
Date Manufactured: 1959
Date Discontinued: Approximately 1980
Date Labeled: None

Product Name: MIN-K 500
Product Type: Sheet/Block
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1958
Date Discontinued: 1977
Date Labeled: 1970

Product Name: MIN-K 1301
Product Type: Sheet/Block
Fiber Type: Amosite
% Fiber by Weight: 5.0 - 12.0
Date Manufactured: 1958
Date Discontinued: 1975

Date Labeled: 1970

Product Name: MIN-K 1000
Product Type: Sheet, Block
Fiber Type: Amosite
% Fiber by Weight: 5.0 - 12.0
Date Manufactured: 1959
Date Discontinued: 1975
Date Labeled: 1970

Product Name: MIN-KLAD
Product Type: Blankets
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1958
Date Discontinued: 1972
Date Labeled: 1970

Product Name: MOLTEN METAL MARINITE
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 38.0 - 40.0
Date Manufactured: 1962
Date Discontinued: 1980
Date Labeled: 1970

Product Name: MX-3808 Asbestos Filler
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 52.0 - 55.0
Date Manufactured: 1951
Date Discontinued: 1970
Date Labeled: 1965

Product Name: MX 4851 (Aluminized) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 75.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: MX 5184 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 65.0

Date Manufactured: 1971
Date Discontinued:
Date Labeled: None

Product Name: MX 5215 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 69.0
Date Manufactured: 1971
Date Discontinued:
Date Labeled: None

Product Name: MX 5243 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 65.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: MX 5385 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: NATIONAL Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1891
Date Discontinued: 1900 - 1903
Date Labeled: None

Product Name: Navy 450 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 13.5 - 38.5
Date Manufactured: 1941
Date Discontinued: Not Active about 1972
Date Labeled: 1965

Product Name: NIAGRITE
Product Type: Felt, Blankets

Fiber Type: Chrysotile
% Fiber by Weight: 98.0
Date Manufactured: 1911
Date Discontinued: 1973
Date Labeled: 1970

Product Name: NODRSEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 59.4
Date Manufactured: 1947
Date Discontinued: 1975
Date Labeled: None

Product Name: Non-Burn Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 97.0
Date Manufactured: 1900
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: PALLITE
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 50.0
Date Manufactured: 1937
Date Discontinued: 1973
Date Labeled: 1970

Product Name: PERFECTON Pipe Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: REEFERITE
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 29.0 - 37.0
Date Manufactured: 1950
Date Discontinued: 1974
Date Labeled: 1970

Product Name: Safety Blow-Off Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Silicated THERMOBESTOS
Product Type: Sheet/Block, Pipe Covering
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1966
Date Discontinued: 1974
Date Labeled: 1966

Product Name: SONITE
Product Type: Block
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1969
Date Discontinued: 1975
Date Labeled: 1970

Product Name: Standard Flexible MIN-K Blankets
Product Type: Paper, Felt, Blankets
Fiber Type: Amosite
% Fiber by Weight: up to 20.0
Date Manufactured: 1963
Date Discontinued: 1974
Date Labeled: 1970

Product Name: STANDARD Sectional Covering (See Wool Felt Sectional
Pipe Insulation)
Product Type: Pipe Insulation
Fiber Type:
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: Stove Putty
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 15.0 - 25.0
Date Manufactured: 1934
Date Discontinued: 1971

Date Labeled: None

Product Name: Polyester Dalkhead

Product Type: Board

Fiber Type:

% Fiber by Weight: Not available

Date Manufactured: 1963

Date Discontinued: 1967

Date Labeled: None

Product Name: Super FIRE FELT

Product Type: Sheet/Block, Paper, Felt, Blanket

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 40.0 - 60.0

Date Manufactured: 1925

Date Discontinued: 1971 - 1975

Date Labeled:

Product Name: SUPEREX 1900

Product Type: Sheet/Block

Fiber Type: Chrysotile and/or Amosite

Fiber by Weight: 10.0 - 12.0

Date Manufactured: 1922

Date Discontinued: 1973

Date Labeled: 1965

Product Name: SUPEREX 2000

Product Type: Sheet/Block

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 9.0 - 12.0

Date Manufactured: 1971

Date Discontinued: 1972 - Asbestos content

Date Labeled: 1971

Product Name: SUPEREX Cement

Product Type: Cement

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 8.4 - 15.0

Date Manufactured: 1922

Date Discontinued: 1973

Date Labeled: 1965

Product Name: Superex Cement for Navy

Product Type: Cement

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 7.0 - 20.0

Date Manufactured: 1941
Date Discontinued: 1957
Date Labeled: 1965

Product Name: SUPEREX-M
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 8.4 - 15.0
Date Manufactured: 1930
Date Discontinued: 1971
Date Labeled: 1965

Product Name: SUPEREX-SG
Product Type: Sheet/Block
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 10.0
Date Manufactured: 1969
Date Discontinued: 1973
Date Labeled: 1966

Product Name: THERM-O-BESTOS
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: Not available
Date Manufactured: 1937
Date Discontinued: 1947
Date Labeled: None

Product Name: THERMOBESTOS
Product Type: Block, Pipe Covering
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1950
Date Discontinued: 1974
Date Labeled: 1964

Product Name: Thermobestos Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1959
Date Discontinued: 1969
Date Labeled: None

Product Name: THERMO FELT
Product Type: Felt

Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1931
Date Discontinued:
Date Labeled:

Product Name: Thermo FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1936
Date Labeled: None

Product Name: THERMOMAT
Product Type: Felt, Tape
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 49.6 - 96.0
Date Manufactured: 1931
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Thermomix 700
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 720
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 770
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 810
Product Type: Cement
Fiber Type: Crocidolite
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermo-Pac 500 (Twisted Asbestos Rope Packing)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1917
Date Discontinued: 1983
Date Labeled: 1972

Product Name: Thermo-Pac 750
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 98.0
Date Manufactured: 1969
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Thermo-Pac 1000
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 98.0 - 100.0
Date Manufactured: 1917
Date Discontinued: 1983
Date Labeled: 1972

Product Name: Thermo-Pac Blue
Product Type: Rope
Fiber Type: Crocidolite
% Fiber by Weight: 100.0
Date Manufactured: 1917
Date Discontinued: 1973
Date Labeled: 1972

Product Name: THERMOTAPE
Product Type: Tape
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1951
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Thermo-Wrap
Product Type: Sheet Blanket, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1939-1950
Date Discontinued: 1971-1975
Date Labeled:

Product Name: THERMOWRAP
Product Type: Blankets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 90.0
Date Manufactured: 1951
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: TRANOSEAL (TRANOLSEAL)
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 38.0 - 47.1
Date Manufactured: 1947
Date Discontinued: 1974
Date Labeled: None

Product Name: TRANSITE Acoustical Panel
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0
Date Manufactured: 1937
Date Discontinued: 1974
Date Labeled: 1970

Product Name: TRANSITE Core Plate
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 52.0 - 71.0
Date Manufactured: 1938
Date Discontinued: 1985
Date Labeled: 1970

Product Name: Type A Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 95.7 - 99.0
Date Manufactured: 1918

Date Discontinued: 1980
Date Labeled: 1970

Product Name: Type 1 UNISEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 55.0
Date Manufactured: 1954
Date Discontinued: 1975
Date Labeled: None

Product Name: Underwriter's Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled:

Product Name: Underwriter's Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled:

Product Name: Underwriter's Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled:

Product Name: UNISEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 53.0 - 59.0
Date Manufactured: 1947
Date Discontinued: 1975
Date Labeled: None

Product Name: Unspecified Grade, Originally Offered
Product Type: Cloth
Fiber Type: Chrysotile

% Fiber by Weight:
Date Manufactured: 1871 - 1875
Date Discontinued:
Date Labeled:

Product Name: Veneered MARINITE
Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 16.0 - 41.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: VITRIBESTOS
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1959
Date Labeled: None

Product Name: Vitro FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1936
Date Labeled: None

Product Name: Welding Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 99.0
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: White Surface Asbestos Jacket
Product Type: Jacket
Fiber Type: Chrysotile
% Fiber by Weight: 82.0
Date Manufactured: 1931
Date Discontinued: 1971
Date Labeled: None

Product Name: XXX Asbestos Millboard

Product Type: Sheet
Fiber Type: Chrysotile
Fiber by Weight: 67.0 - 73.0
Date Manufactured: 1968
Date Discontinued: 1980
Date Labeled: 1970