

FILE NAME: Armco (ARM)

DATE: 1998

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DOCUMENT DESCRIPTION: Legal Armco's Responses to Interrogatories - Membership in IHF, AIHA, etc. IHF Card Says 1961-1971

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BRAYTON HAKLEY CURTIS
HAND _____ OVERNIGHT _____ MAIL _____

7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 IN AND FOR THE COUNTY OF SAN FRANCISCO
9

10 IN RE:

11 COMPLEX ASBESTOS LITIGATION
12 _____

NO.

DEFENDANT ARMCO INC.'S
AMENDED RESPONSES TO
PLAINTIFFS' GENERAL ORDER
NO. 129 INTERROGATORIES

13
14 INTRODUCTION

15 Defendant Armco Inc. hereby responds to Plaintiff's General Order No. 129
16 Interrogatories as follows:

17 Discovery is continuing. Initial production and review of documents has just begun in
18 certain cases and these answers are based upon information presently known. Other
19 information may become available and defendant reserves all of its rights to amend and/or
20 supplement these responses if and when additional information becomes known.
21

22 GENERAL OBJECTIONS

23 1. Defendant's responses to these interrogatories are based upon information
24 currently available and are made without prejudice to defendant's rights to use subsequently
25 discovered facts or facts currently known but for which the relevance, significance or
26 applicability has not yet been ascertained. If and as additional responsive information or
27 documents are discovered, these responses will be supplemented to the extent that
28 supplementation may be required by law.

- 1 A. Joseph Thompson v. Abex Corporation, et al., Case No. 953830.
- 2 B. Superior Court of the State of California, County of San Francisco.
- 3 C. The deposition of Ernest J. Blache, Jr., taken October 12, 1994.
- 4 D. Brayton, Gisvold & Harley (presently known as Brayton Harley Curtis).
- 5 E. Juliette F. Finley, Tooker & Antz, 131 Stewart Street, San Francisco,
- 6 California 94105.

7 INTERROGATORY NO. 13:

8 For each of the following, please state whether, at any time within the time frame or
9 until such time as any defendant which had been engaged in MARKETING RAW
10 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS discontinued the MARKETING of
11 such products, this defendant was a member or paid dues for any representative of THIS
12 DEFENDANT (excluding faculty members of educational institutions) to be a member of the
13 following:

- 14 A. American Conference of Governmental Industrial Hygienists;
- 15 B. American Industrial Hygiene Association;
- 16 C. American Petroleum Institute;
- 17 D. American Railroad Association;
- 18 E. Asbestos Cement Producers Association;
- 19 F. Asbestos Information Association (AIA)(please answer through date of YOUR
20 answers);
- 21 G. Asbestos Information Association/North America (AIA/NA)(please answer
22 through date of YOUR answers);
- 23 H. Asbestos Textile Institute (ATT);
- 24 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);
- 25 J. Industrial Mineral Insulation Manufacturers' Association;
- 26 K. Magnesia Insulation Manufacturers' Association;
- 27 L. Magnesia Silica Insulation Manufacturers' Association;
- 28 M. Mineral Wool Institute;

- 1 N. National Insulation Manufacturers' Association (NIMA);
2 O. National Safety Council;
3 P. New York Academy of Sciences;
4 Q. Quebec Asbestos Mining Association (QAMA);
5 R. Refractories Institute;
6 S. Safe Building Alliance (please answer through date of YOUR answers);
7 T. Thermal Insulation Manufacturers' Association (TIMA);
8 U. U.S. Maritime Commission;
9 V. IDENTIFY any other organizations, associations or groups of manufacturers,
10 miners, distributors, importers, labelers, suppliers, and/or sellers of ASBESTOS-
11 CONTAINING PRODUCTS of which THIS DEFENDANT was a member.
12 W. IDENTIFY any such representative of THIS DEFENDANT.

13 RESPONSE TO INTERROGATORY NO. 13:

- 14 A. Yes.
15 B. Yes.
16 C. Yes.
17 D. Upon information and belief, no.
18 E. Upon information and belief, no.
19 F. Upon information and belief, no.
20 G. Upon information and belief, no.
21 H. Upon information and belief, no.
22 I. Yes.
23 J. Upon information and belief, no.
24 K. Upon information and belief, no.
25 L. Upon information and belief, no.
26 M. Upon information and belief, no.
27 N. Upon information and belief, no.
28 O. Yes.

- 1 P. Upon information and belief, no.
2 Q. Upon information and belief, no.
3 R. Upon information and belief, no.
4 S. Upon information and belief, no.
5 T. Upon information and belief, no.
6 U. Upon information and belief, no.
7 V. Upon information and belief, none.
8 W. Not applicable.

9 INTERROGATORY NO. 14:

10 For each organization, association or other entity identified in YOUR Response to
11 Interrogatory No. 13, please state:

- 12 A. The dates during which THIS DEFENDANT was a member;
13 B. The name(s) of any publication(s) received by THIS DEFENDANT from such
14 association or organization;
15 C. The name of any committee or subcommittee of which THIS DEFENDANT
16 was a member, and the dates of such committee or subcommittee membership.

17 RESPONSE TO INTERROGATORY NO. 14:

18 A. American Conference of Governmental Industrial Hygienists.
19 Defendant is uncertain when it was a member of the American Conference of
20 Governmental Industrial Hygienists. Additionally, defendant has been unable to find any
21 information responsive to subparts (B) and (C) of this interrogatory. If information
22 pertaining to this defendant's membership in the American Conference of Governmental
23 Industrial Hygienists becomes available, this defendant will supplement this response at a
24 later time.

25 B. American Industrial Hygiene Association.
26 Defendant is uncertain when it was a member of the American Industrial Hygiene
27 Association. Additionally, defendant has been unable to find any information responsive to
28 subparts (B) and (C) of this interrogatory. If information pertaining to this defendant's

1 membership in the American Industrial Hygiene Association becomes available, this
2 defendant will supplement this response at a later time.

3 C. American Petroleum Institute.

4 Armco Steel Corporation is listed as a member on the API company membership roll
5 for 1972, 1973, and 1974.

6 I. Industrial Hygiene Foundation.

7 Upon information and belief, Armco Steel Corporation was a member of the
8 Industrial Hygiene Foundation in 1961, 1963, 1964, 1966, 1967, 1968, and 1969; as to other
9 particular years, Armco Steel Corporation's membership is undetermined.

10 O. National Safety Council.

11 American Rolling Mill Company is listed as a charter member beginning in 1935 and
12 is listed on the membership rolls for 1936, 1937, 1944, and 1945. Armco Steel Corporation
13 is listed as a member in 1951 through 1954, 1960 and 1961 through 1964. Armco Inc. was
14 a member of the Metals Committee in 1935 through 1936, and chairman in 1936 through
15 1937. Armco Inc. was a member of the Council Service Committee in 1944 and an
16 Advisory Chairman to the Metallic Coating Industry Committee for the metal section in 1951
17 and 1952. Armco Inc. was a member of the Steel Industry Committee in 1961 through
18 1964, and chairman in 1951, and on the Trade Associations Liaison Committee in 1952, an
19 Advisory Chairman to the Metal Section Steel Industry Committee in 1953, 1961, and on the
20 Research and Advisory Committee in 1962 through 1964. Armco Inc. was a member of the
21 Metals Section Engineering and Consulting Committee in 1961 and 1962, and then a member
22 of the Metal Section Technical Publications Committee in 1963 and 1964.

23 INTERROGATORY NO. 15

24 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing
25 results or conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of
26 New Jersey relating to asbestos exposure in the workplace or the human health consequences
27 of exposure to asbestos? If so:
28