IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES PARK LAIRD, Plaintiff, vs. THE CELOTEX CORPORATION, et al., Defendants.	)	CIVIL ACTION FILE NO. C83-2720A

ANSWER AND OBJECTIONS OF THE CELOTEX CORPORATION TO PLAINTIFF'S MASTER INTERROGATORIES

The Celotex Corporation, for answers to Plaintiff's master set of interrogatories, states as follows:

The Celotex Corporation (hereinafter Celotex) is a successor-in-business to various companies and corporations which were engaged in the manufacture and sale of asbestos-containing insulation products. Celotex's involvement in the asbestos insulation business began with its purchase of Panacon Corporation in 1972. Prior to that date, Celotex did not have any interest whatsoever in the asbestos insulation field.

Most all of the events which may be relevant to the issues presented in this and related cases, occurred prior to Celotex's purchase of Panacon Corporation. For this reason and the fact that many of the matters inquired about took place several decades ago, information furnished in this response may be incomplete. Nevertheless, Celotex has endeavored to fully investigate all relevant happenings and circumstances and the

following responses are based upon its investigation. However, Celotex cannot exclude the possibility that its continued investigation may reveal more complete information. Furthermore, a considerable amount of the inforamtion supplied in these responses was obtained from employees of predecessor corporations. Accordingly, Celotex can only relay this information; it cannot attest to the accuracy or truthfulness of such responses. Information of this nature is being supplied because it may lead to the discovery of admissible evidence.

Finally, this Defendant will be guided by the statutory requirements of supplementation per Rule 26(e) of the Federal Rules of Civil Procedure.

Without waiver of any of the above, The Celotex Corporation, for answers to Plaintiff's master set of interrogatories, states as follows:

1. The responses to these interrogatories are prepared by the legal department of the parent corporation of The Celotex Corporation. They are signed by D. S. Gibson, Manager of Safety and Property Conservation as authorized officer of the corporation, and not on the bases of his personal knowledge of the facts stated therein.

2. Yes. August 28, 1964. Principal place od business is 1500 N. Dale Mabry Highway, Tampa, Florida 33607. Celotex has assumed all ordinary liabilities of its predecessors.

3. The Celotex Corporation has been in the business of manufacturing, selling and distributing high temperature industrial insulation products only since 1972. Its predecessors-

in-business manufactured, sold and distributed such products from 1906 until 1972.

4. Defendant is not engaged in the mining and/or milling of asbestos. However, Carey Canada, Inc., (formerly known as Carey-Canadian Mines, Ltd.) was incorporated in the dominion of Canada on February 14, 1955. This corporation was acquired by The Celotex Corporation in 1972, and is presently an independent wholly owned subsidiary of The Celotex Corporation. Carey Canada, Inc. is engaged in the mining and milling of raw chrysotile asbestos fibers. All sales of the raw asbestos fibers take place in Canada.

5. Yes. See Response No. 3 above.

6. (a-d) See attached Product List marked Exhibit "B". The asbestos contained in the listed products was chrysotile asbestos fiber with the exception of: Product No. (13) through No. (16) and (34) which were composed of amosite and chrysotile; Product No. (21) and (60) which were composed of amosite only.

(e-f) Defendant objects to a detailed description of the physical appearance and intended uses of each such product listed on the grounds that this request is over broad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information.

(g) Refer to Corporate History attached and marked Exhibit "A".

(h) Raw asbestos fibers are believedto have been purchased from the following sources:

Vermont Asbestos (G.A.F.)	Quebec Asbestos Corp., Ltd.
Asbestos Corporation, Ltd.	Johnson Asbestos
Calvaros Asbestos	North American Asbestos
Johns-Manville	Carey-Canadian Mines, Ltd.

7. Yes.

8.

ASBESTOS FIBER
PIPE INSULATION PATENTS

Patent Number	Date
1931795	10/24/33
1974519	9/25/34
2042096	5/26/36
2262953	11/18/41
2225032	3/03/42
2284439	5/26/42
2288170	6/20/42
2348829	5/16/44
2348898	5/16/44
2884380	4/28/59
2971878	2/14/61
3367871	2/10/68
3408316	10/29/68
3639276	2/01/72

9. Except for Careytemp, no alterations have been made to any asbestos products which would have any bearing on the issues presented in this litigation. As to Careytemp, a predecessor removed all asbestos from this product in September of 1969. This product line was developed because reinforcement with glass fiber made the product less susceptible to breakage. Also, this change was made as a result of the controversy that existed concerning the use of asbestos-containing products. Also, prior to removing asbestos fiber from Careytemp, predecessors substituted amosite fiber for chrysotile fiber for a period of one year prior to removing all asbestos from the Careytemp line.

10. See Response to No. 9 above.

11. Yes.

12. Celotex is a member of the Asbestos Information Association of North America. The Association may have conducted such research, and should be contacted for further information regarding their research.

As to research relating specifically to predecessor's product, a study was conducted March 10, 1961, at the Indianapolis Power & Light Company, Harding Street Plant, Indianapolis, Indiana, by John Kehoe, Chemical Engineer, Indiana State Board of Health, 1330 W. Michigan Street, Indianapolis, Indiana. Attached and marked Exhibit "C" is a letter from Albert Edwards, Industrial Hygiene Engineer, to P. P. Ray, Indianapolis Contract Manager, of the Philip Carey Manufacturing Company. This letter is dated April 13, 1961, and reached the following conclusion:

> "Under present operating conditions, it is concluded that no serious dust exposures are associated with the installation of Careytemp insulation."

In addition, a test was conducted at the Union Carbide Plant in Institute, West Virginia in 1967. Celotex has a document, attached and marked Exhibit "D", dated January 2, 1968, addressed to Art Mueller and authored by J. Pierce, Assistant Professor of Environmental Health at the Kettering Laboratory in Cincinnati, Ohio. The document reports and analyzes samples of air taken during fabrication of Careytemp insulation at the Union Carbide plant in Charleston, West Virginia. Dust counts taken at the sawing and fabrication operation indicated dust levels far below the threshold limit value for nuisance dust as established by the ACGIH. Because of the low asbestos

content of Careytemp, x-ray defraction tests failed to pick up any airborne asbestos fibers. However, the study recognized that trace amounts (less than 5%) of crystalline silica and asbestos fiber are not often detectable using x-ray defraction techniques. Nevertheless, it was felt that the amount of airborne asbestos fiber, if any, was certainly below the accepted threshold limit value for asbestos fiber. Mr. J. Pierce reported his objective findings, but did not state any conclusions after conducting the dust count.

13. No.

14. Not applicable.

15. Yes.

16. See Response No. 12 above.

17. No.

18. Not applicable.

19. Yes.

20. Defendant first used warnings in sales literature brochures in 1974. See the attached samples of sales literature brochures marked Exhibit "E" for the wordings or various warnings used by The Celotex Corporation. The Celotex Corporation did not consult any industrial psychologist or the like prior to including the above-described warnings in its product literature brochure.

21. Yes.

22. Defendant's high temperature industrial insulation products were shipped in bags, boxes, crates and gallon drums. Application instructions were printed on predecessors' bags of

MW-1 and MW-50 cement. Celotex is continuing its efforts to locate and review records of its predecessors-in-business, but cannot at this time state what other instructions, if any, were given by predecessors-in-business.

Warning labels were placed on Celotex's products containing asbestos. Research indicates that warning labels first appeared on such products in 1972. Because of record retention policies, we do not have complete records of our predecessors-in-business. The warning label had the following information printed in bold, black letters on a white background:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

The above warning was revised and the following warning was used by The Celotex Corporation from 1976 to early 1979. This warning also appeared in the sales literature brochures of Celotex:

WARNING
THIS PRODUCT IS (ASBESTOS FIBER) OR (CONTAINS ASBESTOS FIBER). THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA), AN AGENCY OF THE UNITED STATES COVERNMENT BELIEVES THAT REPEATED INHALATION OF ASBESTOS FIBERS IS A HEALTH HAZARD AND MAY CAUSE VARIOUS DISEASES INCLUDING CANCER AND ASBESTOSIS.

These warnings appeared on printed labels approximately 3 x 4 inches in size. In July, 1979, Celotex again revised the warning label to read as follows:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE SERIOUS
BODILY HARM. INCLUDING CANCER AND ASBESTOSIS
IF DUST IS CREATED, PERSONS EXPOSED TO THIS MATERIAL
SHOULD USE ADEQUATE PROTECTIVE DEVICES.
SMOKING GREATLY INCREASES THE RISK
OF SERIOUS BODILY HARM

23. Yes.

24. Defendant is involved in a large number of asbestos-related lawsuits and objects to furnishing the requested information on the grounds that it would be unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

25. Celotex and predecessors-in-business are/were engaged in highly diversified businesses. Asbestos-containing insulation sales constituted a minimum of the business of predecessors-in-business. Such sales are only a minute portion of Celotex's business. Accordingly, available invoice records reflecting general sales are predominantly comprised of non-asbestos products. Records of asbestos insulation sales have not been segregated from the general sales invoices; therefore, locating records of insulation sales involves a manual search of each invoice in order to determine if the sale consisted of any asbestos product.

Invoice records since September 1, 1974, are located in Tampa, Florida. These records are stored in a computer and can only be retrieved by searching each customer at a particular address on a monthly basis. See the attached affidavit of Stanley Peters, marked Exhibit "F", for a further explanation

of the difficulty in computer record search for invoices on asbestos-containing insulation products.

Celotex has a limited number of invoices of predecessors-in-business dating back to 1967. These invoice records are not segregated into asbestos products and non-asbestos products, and therefore the same search problem is encountered with these invoice records. Also, a large percentage of these records are not indexed according to purchaser, rather, they are indexed according to the plant where the product was manufactured and the date of manufacture. The plants manufactured many other products which did not contain asbestos. These records are stored at Defendant's plant in Locklan, Ohio. See the attached affidavit of Ken Brown, marked Exhibit "G", for a further explanation of the difficulty in searching required to find particular records.

26. See Response to No. 25 above.

27. Defendant intends to assert all valid defenses available to it and properly raised in pleadings. Please refer to previous pleadings. Defendant has no intention of surrendering any valid defense at this point in the discovery process.

28. Improper use of product is a matter which is still under investigation by Defendant during on-going discovery through depositions, interrogatories and record searches.

29. Yes.

30. Please see attached list of liability carriers for Defendant and its predecessors, marked Exhibit "H". The amount and extent of coverage is presently being litigated, and Defendant

is unable to state same.

31. Defendant objects to this interrogatory on the grounds that the phrase "so as to eliminate all potential health hazards" is vague and ambiguous. Also, any answer to this question would be meaningless inasmuch as a manufacturer is not a guarantor,and cannot be held to such a standard of eliminating "all" potential health hazards. For example, a glass bottle manufacturer could not eliminate the possibility that someone might accidentally drop an otherwise safe bottle and cut themselves. Furthermore, the question is without any evidentiary value because it deals with a possibility rather than a probability. Defendant submits that many reasonable people believe that "anything is possible!". Without waiving any of the aforesaid objections, Defendant states that it believes currently manufactured asbestos products (such as asbestos paper, asbestos roofing felts, asphalt saturated asbestos roofing cement, etc.) do not present any substantial health hazard to workers applying or otherwise using the products in a reasonable fashion.

32. See Response to No. 31 above.

33. Please refer to Defendant's previous answer regarding packaging of asbestos-containing products. Our best information indicates that packages were purchased from Container Corp. of America, 9960 Alliance Road, Cincinnati, Ohio, and Inland Container Corp., 912 Nalbar Street, Middletown, Ohio. These companies should be contacted for further information.

34. No.

35. Not applicable.

36. (a) Please refer to Response No. 6 above.

(b) - (c) Defendant has been unable to develop any accurate or reliable information in this regard as to all sources except Carey Canada, Inc. (formerly Carey-Canadian Mines, Ltd.). Carey Canada began using warning or cautionary labels in 1971. Since Carey Canada, Inc. is a named Defendant in this case, Celotex suggests that Plaintiff refer to that Defendant's responses to interrogatories for complete information in this regard.

37. The Celotex Corporation and its predecessors-in-business have operated manufacturing facilities, which produced asbestos-containing insulation materials, at the following locations:

Lockland, Ohio - 1906 through present.
(high and low temperature insulation products);

Plymouth Meeting, Pennsylvania - 1906 through 1962.
(high temperature insulation products only);

Linden, New Jersey - unknown through present.
(asbestos papers and felts). Defendant took over in 1969.

38. Not applicable.

39. Defendant's predecessors-in-business may have imported some asbestos fiber from South Africa, but Defendant has no further information in this regard.

40. See Response No. 39 above.

41. The Celotex Corporation has been in the business of manufacturing, selling and distributing high temperature industrial insulation products only since 1972. Its predecessors-in-business manufactured, sold, and distributed such products from 1906 until 1972.

42. (a) Throughout the United States, but primarily east of the Mississippi River.

(b) See Response to No. 41 above.

43. Due to record retention policies, Defendant does not have complete records of its predecessors-in-business. Products were discontinued due to lack of demand and/or technological advancements and improvements. See also Response No. 9 above regarding the development of asbestos-free high-temperature insulation in 1969.

44. None, except in recent years during pending litigation.

45. To the extent that information was furnished or exchanged during and in light of pending litigation, the Defendant objects to this interrogatory on the grounds that the information sought is prepared in anticipation of litigation, is attorney work product and privileged.

46. The Defendant objects to this interrogatory on the grounds that it is over broad, assumes facts and seeks privileged information. Without waiving its objection, Defendant states that neither this Defendant nor its predecessors-in-business have interchanged research results.

47. See objection to previous interrogatory.

48. Defendant is unable to respond to this hypothetical question as it assumes facts which would render any answer misleading and prejudicial.

49. Not applicable.

50. Celotex is a member of the Asbestos Information Association of North America (AIA/NA); AIA/NA has conducted

research on the effects of asbestos. As to what expenditure the Association has made or what reports it has developed, inquiries should be directed to the Association. Celotex's records do not contain research reports from this agency.

In 1962, Dr. Thomas Mancuso was retained for one year to review the Occupational Health Program at predecessor's Lockland, Ohio manufacturing plant. Dr. Mancuso's current address is the University of Pittsburgh, Pittsburgh, Pennsylvania. See also response to No. 12 above.

51. None. See Response to No. 54 below.

52. Not applicable.

53. Not applicable.

54. Neither Celotex nor its predecessors-in-business had a person employed as a medical officer or director. For a period of one year in 1963, a predecessor-in-business retained Dr. Thomas Mancuso as a Medical Consultant, to review the Occupational Health Program at the Lockland, Ohio plant. Dr. Mancuso is employed at the University of Pittsburgh, Pittsburgh, Pennsylvania.

Due to record retention policies, Defendant does not have complete records of its predecessors-in-business; however, Defendant is aware that the following physicianswere at some time employed or retained by predecessors-in-business. Those doctors were:

Dr. Virgil A. Plessinger, 2700 Central Trust Tower, Cincinnati, Ohio;

Dr. C. G. Ruehlman, 83 South Eagle Road, Hebrewtown, Pennsylvania;

Dr. Robert G. Loudon; address unknown.

55. Lee B. Fosdick, address unknown, was hired by Celotex's predecessors-in-business in December 1962, to perform an industrial hygiene survey of dust levels at the Lockland, Ohio plant. The following industrial hygienists were employed to take dust level counts:

B. I. Stallings, address unknown; 1967, 1972.

Edward B. Engle, address unknown; May, 1968.

Professor D. W. Yeager, Institute of Environmental Health, Kettering Laboratories, University of Cincinnati, Cincinnati, Ohio; August, 1974 and April, 1978.

Fred T. Lyon, address unknown; February, 1976 and April, 1976.

Michael B. Amster, address unknown; April 1, 1978 and July, 1977.

Robert L. Sweeney, address unknown; October, 1974 and June, 1973.

E. B. Engel, address unknown; March, 1971.

D. B. Troup, address unknown; July, 1973.

S. R. Wheeler, address unknown; Linden, New Jersey plant, date unknown.

56. Not applicable. See Response to No. 54 above.

57. Because of document retention policies, Celotex does not have complete records of predecessors-in-business; its investigation is continuing. Celotex's best information indicates it has received publications from the following trade associations:

Asbestos Information Association/North America
Gypsum Association
Department of Labor, National Safety Council
Asphalt Roofing & Manufacturing Association

Since entering the high-temperature industrial insulation business in 1972, Defendant has received some trade association

periodicals which contain articles regarding whether a relationship exists between asbestos exposure and certain health hazards. Defendant objects to producing articles of this nature as it would constitute an undue burden on Defendant. Furthermore, these articles are equally available to the Plaintiff.

58. See Defendant's previous answer regarding membership in AIA/NA.

59. Unknown to this Defendant. Inquiries should be directed to the AIA/NA.

60. None other than previously stated above.

61. Celotex is a member of AIA/NA and makes annual contributions in the amount of $11,700. As to what expenditures the association has made or what reports it has developed, inquiries should be directed to the association.

62. Not applicable.

63. In 1931, Philip Carey Manufacturing Company organized a Research and Development Department. This department was operated until June 30, 1972, when Panacon Corporation merged into The Celotex Corporation. There are no former department heads presently affiliated with, or employed by, The Celotex Corporation.

Since August, 1966, Jim Walter Corporation (Defendant's parent corporation) has operated Jim Walter Research Corporation, located at 1030 Ninth Street North, St. Petersburg, Florida. The current president of this corporation is Don Hipchen. The primary function of this corporation is the research and development of new products and processes for all Jim Walter Corporation susbidiaries, including The Celotex Corporation.

64. Defendant objects to this interrogatory on the grounds that it is extremely over broad and unduly burdensome.

65. Defendant objects to this interrogatory on the grounds that it is extremely over broad and unduly burdensome. Defendant has no information indicating whether or not predecessors distributed such information to distributors of their asbestos-containing products. Upon becoming aware of the hazards, Celotex placed warnings on products which would have been visible to all those coming in contact with the product. See also Response to No. 20 above regarding warnings contained in sales literature brochures and refer to Exhibit "E".

66. Celotex objects to furnishing a response relating to compensation claims filed by employees at Defendant and/or predecessors' manufacturing plants. Plant employees worked with and were continually exposed to 100% raw asbestos fiber in an enclosed plant environment. Insulation applicators, however, were exposed to a manufactured product containing a much smaller percentage of asbestos, and such asbestos fiber was encapsulated in the products manufactured. Without waiving this objection, Celotex sets forth below a list of unverified claims of former employees who worked outside of the manufacturing plants and whose exposure to asbestos may have been similar to the exposure of the Plaintiff.

WORKMEN'S COMPENSATION CLAIMS

The Celotex Corporation, successor-in-business to the Philip Carey Manufacturing Company, believes that the following individuals may have filed a workmen's compensation claim for an illness associated with exposure to asbestos dust. Much of the

following information was recently discovered in connection with current asbestos litigation. Accordingly, The Celotex Corporation is unable to verify if, or when, Philip Carey became aware of the claims listed below.

The Celotex Corporation has searched its records for additional information and/or verification of these claims. All material information that has been obtained is listed below. It must be emphasized that Celotex is not admitting or verifying the authenticity of any claim listed below. Further, the information is being supplied because it may lead to the discovery of relevant and admissible evidence. The information below does not include any workmen's compensation claims filed by employees working in any manufacturing facility:

Employee Name	Date Filed (Date Death)	State	Disposition	Alleged Disability
Harold Swinson	9/61 (1961)	RI	Death Claim - Unknown	Silicosis/ Asbestosis
Wm. E. Latto	1/10/61 (2/22/65)	OH	Disab. Allowed 5/62 - Death Claim Pending	Asbestosis
Nelson L. Lee	10/1/79	DE	Death Claim Pending	Asbestosis/ Carcinoma of lung
Adolpho Serra	8/31/77	MA	Death Claim - Unknown	Adeno Carcinoma

The following information was received either from Armstrong Cork Company in their response to a recent Plaintiff's production request or from Johns-Manville through exhibits they produced for trial. Celotex has no independent information to deny and/or corroborate the substance of the documents. Defendant is unable to determine where the below listed claimants were employed, as the

only relevant employment address lists predecessor's home office, where paychecks were issued. However, Defendant believes the claimants probably worked in one of Philip Carey's contract units. The documents indicate the following:

Claimant's Name	Date Filed (Date Death)	State	Disposition	Alleged Disability
James W. Riley	1954 (1/24/61)	CA	Disability Allowed 11/59	Pneumonconiosis
John E. Swartout	Disab. 12/55 Death 6/56 (5/30/56)	CA	Death Claim Allowed	Asbestosis
Steve Gilivich	11/61	CA	Disability Settled 1965	Respiratory Injury
Anthony J. Onofrio	1962	CT	Disability Claim Unknown	Unknown
Allen Everitt	5/27/63	CA	Disability Claim Unknown	Pulmonary Disease
William Crader, Sr.	6/10/66 (3/7/66)	CA	Death Claim Allowed	Asbestosis
Clifford Harding	Unknown	CA	Disability Claim Settled	Asbestosis
Edward L. Pfleghaar	11/68	CA	Disability Claim Settled 3/71	Asbestosis
Henry C. Puetz	7/26/66	CA	Disability Allowed Appeal Settled	Asbestosis

In addition, Celotex is aware of the possibility that the following individuals may have contracted an asbestos-related disease. The below-listed information was obtained from a hand-written list of names which Celotex has been unable to verify. Celotex has no information on these individuals other than, in some cases, their address, date of employment and treating physician:

Name	State	Disposition
John Tyler, dec'd.	CA	Settled 10/24/68
Robert Horseman	CA	Unknown
Wayne E. Boyer	NE	Unknown
Clyde Nicholson	CA	Unknown
William McCormick	CA	Unknown

67. No.

68. No.

69. No.

70. No.

71 Defendant is not aware of any representative of predecessors-in-business having attended the meeting referred to in this interrogatory.

72. No.

73. (a) - (d) No.

74. Yes.

75. Defendant and predecessors have never sponsored any formal seminars. However, safety meetings are regularly held at the plants which manufacture asbestos-containing products. The inhalation of asbestos fiber is periodically discussed at these safety meetings.

Plant safety bulletins such as those marked Exhibit "I" date back at least to 1944. Further, safety booklets such as that attached and marked Exhibit "J" have periodically been distributed. In addition, Celotex and its predecessors have instituted in-plant safety programs. The present Safety and Conservation Manager is D. S. Gibson, 1500 N. Dale Mabry, Tampa, Florida 33607.

76. No. The Defendant entered the high-temperature industrial insulation business in 1972. By this time the labor unions had many more years of experience in the industry than Celotex. The labor unions representing insulation workers were also completely aware of the works of Dr. Selikoff and others relating to the dangers associated with the prolonged use of asbestos-containing products, particularly those dust exposures occurring in the 1940's and 1950's.

77. See Defendant's answer to No. 76 above.

78. Defendant objects to this interrogatory on the grounds that it presumes a duty on the part of the Defendant (to go beyond Plaintiff's employer to communicate directly with its employees). High temperature industrial insulation asbestos products were generally sold to insulation application contractors, distributors and sophisticated vendees who carried the main burden of responsibility for safety on the job. Defendant states that it has no jurisdiction over such people. Without waiving its objection, Defendant states that after becoming aware of the hazards, warnings were placed on products which would have been visible to all those coming into contact with said product. Also, refer to previous answers regarding the wording on such warnings.

79. See answer to No. 78 above.

80. Defendant objects to this interrogatory on the grounds that it seeks information that is work product of Defendant's counsel and its agents and is prepared in anticipation of litigation and thereby privileged.

81 Defendant objects to this interrogatory on the grounds that it seeks information that is work product of Defendant's counsel and agent and is prepared in anticipation of litigation and is thereby privileged. Without waiving its objection as to Plaintiff's statement, the Defendant states that it is aware of no statement made by Plaintiffs except those taken by deposition at which Plaintiff's counsel was present.

82. Not applicable.

83. Not applicable.

84. None. Neither Defendant nor its predecessors have maintained any specific library which would facilitate the need for a medical librarian.

85. Defendant has no records and no information indicating that it or predecessors-in-business subscribed to the Asbestos Worker magazine.

86. Defendant believes that predecessors-in-business may have received the Asbestos magazine, but it is unable to determine the dates of subscription.

87. Application instructions were printed on predecessors' bags of MW-1 and MW-50 cement. Celotex is continuing its efforts to locate and review records of its predecessors-in-business but cannot at this time state what other instructions, if any, were given by predecessors-in-business.

Since the late 1950's Defendant's predecessors-in-business have recommended the use of an asbestos-free cement in conjunction with their high-temperature asbestos insulation products. Furthermore, Defendant's predecessors developed and recommended the use

of premolded asbestos insulation products to facilitate application and reduce labor costs. Use of these premolded products reduced the dust levels at the job site.

Various sales literature brochures of Celotex and its predecessors-in-business may contain additional information regarding application procedures and recommended uses. These can be made available to the Plaintiffs at a time and place mutually agreeable to both parties.

88. Please refer to Response No. 12 above. See also the attached dust study authored by E.D. Ermenc, marked Exhibit "K".

89. Defendant has no records and no information indicating that predecessors-in-business conducted such tests or studies. Of course, Defendant was not involved with asbestos-containing insulation products prior to 1972 and did not, therefore, conduct any such tests prior to 1964.

90. The requested information is unknown at the present time, as discovery is still continuing.

91 This interrogatory is interpreted as requesting the Threshold Limit Value standards set by the Occupational Safety and Health Administration. OSHA standards are a matter of public record and are equally available to Plaintiff. In addition, Celotex and its predecessors-in-business have been advised of the following Threshold Limit Values:

(1) OSHA 1971 and all subsequent regulations.

(2) Safety and Health Standards for Federal Supplied Contracts, U. S. Department of Labor, Wage and Hour Public Contracts Division, Washington, D.C. (Walsh-Healy Act 1961).

Celotex did not enter the business of manufacturing high temperature insulation products until 1972. J. F. Kegenith, Manager of Employee Relations for The Celotex Corporation, received "Safety and Health Standards for Federal Supplied Contracts". Celotex has been informed that E. A. DiSalvo, Vice President of Panacon Corporation, received OSHA notices. Celotex and its predecessors-in-business have applied the Threshold Limit Standards required under the Walsh-Healy Act since 1961 and the standards required under the Occupational Safety and Health Act since 1971. Also, Philip Carey Manufacturing Company followed the recommended Threshold Limit Standards for Nuisance Dust, enacted by The Industrial Commission of Ohio, Division of Safety and Hygiene in approximately 1949.

92. Defendant is unable to state such opinions for the various reasons contained in the Preliminary Statement to these interrogatories. However, based upon the study conducted by Albert Edwards, it is reasonable to assume that predecessors-in-business believed that the prescribed threshold limit values for 1960 were not being exceeded at the job sites.

93. Defendant first received information on threshold limit values upon entering the high-temperature asbestos insulation business in 1972. Defendant is informed and believed that the Philip Carey Manufacturing Company followed the recommended threshold limit standards for nuisance dust enacted by the Industrial Commission of Ohio Division of Safety and Hygiene in approximately 1949.

94. The Defendant Celotex was not engaged in the insulation business until 1972 and, therefore, performed no such investigations prior to 1960. This information is unknown as to predecessors-in-business. However, see report of Albert Edwards regarding the March 10, 1961, investigation of exposure of union insulators and the conclusion that exposure was within safe limits and presented no health hazards.

95. Defendant objects to this question on the grounds that it is vague and over broad. The information regarding the manner in which Defendant's products were actually cut, sawed, prepared, etc., at job sites is more readily available to the Plaintiffs. Without waiving its objection, Defendant states that since the late 1950's Defendant's predecessors-in-business have recommended the use of an asbestos-free cement in conjunction with their high-temperature asbestos insulation products. Furthermore, Defendant's predecessors developed and recommended the use of premolded asbestos insulation products to prevent the creation of excessive dust at the job site.

96. Celotex has recently become aware of Dr. Dreesen's article in Public Health Bulleting No. 241 of 1938. However, this article dealt with asbestosis as an occupational disease contracted by workers involved in the mining and milling of asbestos fiber, and the manufacturing of asbestos products in an enclosed plant environment. It did not apply to field conditions at the job site; nor did this report recognize any risks to insulation workers at the job site.

97. The best information available to this Defendant indicates that its predecessors-in-business became aware of some of the possible health hazards associated with exposure to asbestos sometime just prior to 1960. However, it was not until the mid-1960's that Defendant's predecessors-in-business became aware that health problems could occur in insulators who had been exposed to relatively low levels of asbestos dust from products.

In the mid-1960's Defendant's predecessors-in-business became aware of Dr. Selikoff's epidemiological study of insulation workers. This study determined that users of asbestos products (insulators) in the 1930's through the 1950's were in some cases experiencing asbestos-related lung problems. Earlier studies had indicated that asbestosis and other health hazards were principally a problem of workers in the mines and manufacturing facilities who were continuously exposed to high concentrations of 100% raw asbestos fiber. It is important to note that the group of workers studied by Dr. Selikoff primarily had exposures in the 1930's and 1940's; decades wherein dust control measures were lacking and workers used products containing higher concentrations of asbestos.

When Dr. Selikoff's study was published in the annals of the New York Academy of Sciences on December 31, 1965, Defendant's predecessors-in-business principal high-temperature insulation product contained a significantly lower percentage of asbestos fiber than did most of its competitors' products. Also, since the late 1950's Defendant's predecessors had been selling premolded insulation products. Insulators working with premolded products

were not required to cut and shape the insulation material, resulting in minimal, if any dust exposure. Since the late 1950's, predecessors recommended the use of an asbestos-free cement in conjunction with their high-temperature asbestos insulation products, which further reduced the amount of airborne asbestos fiber in the workplace. Defendant's predecessors believed that any health hazards or increased risk to insulators as outlined in Selikoff's study had been eliminated in recent years for the reasons set forth above and for the general improvement and working conditions on the job site. In 1969 Defendant's predecessor-in-business removed asbestos from its principal high-temperature industrial insulation product. This product line was developed because reinforcement with glass fiber made the product less susceptible to breakage. Also, this change was made as a result of a growing awareness of the controversy that existed concerning the health hazards associated with the prolonged use of certain asbestos-containing products.

98. Neither Defendant nor predecessors-in-business maintained a specific library for medical information pertaining to the effects of asbestos on human health. However, Celotex is informed and believes that predecessors-in-business received the following documents sometime prior to Celotex's acquisition of Panacon Corporation in April, 1972. However, any of the following were not received at or near the article's publication.

ASBESTOS-RELATED PUBLICATIONS RECEIVED BY CELOTEX'S PREDECESSORS-IN-BUSINESS

DATE	TITLE	AUTHOR(S)	PUBLISHER/ PUBLICATION	DATE RECEIVED
1955	"Mortality From Lung Canger in Asbestos Workers"	Richard Doll	British Journal of Industrial Medicine	
1957	"The Asbestos Industry-Certain Health Experiences Among Asbestos Workers"	Kenneth W. Smith, M.D. and Hugh Jackson	Home Office Life Underwriters Association	4/63
Post 1960	"Nonoccupational Asbestosis"	Raimo Kiviluoto	Medical Practices	
4/24/60	"Diffuse Pleural Mesothelioma and Asbestos Exposure in the North Western Cape Province	J. C. Wagner C. A. Sleggs and Paul Marchand	British Journal of Industrial Medicine	
12/3/60	"Asbestosis and Abdominal Neoplasms"	E. E. Neal	The Lancet	
2/1963	"Methodology In Industrial Health Studies"	Thomas F. Mancuso, M.D, MPH, and Elizabeth J. Coulter, M.D.	Archives of Environmental Health, Vol. 6	4/5/63
7/1963	"Talc Pneumo-coniosis"	M. Kleinfeld, M.D. C.P. Giel, M.D. J.F. Majeranowski, M.D. and J. Messite, M.D.	Archives of Environmental Health, Vol. 7	
10/3/63	"Case Records of the Massachusetts General Hospital"	Benjamin Castleman, M.D., Ed.	The New England Journal of Medicine	11/5/63
1964	"Occupational Health Study of the Asbestos Products Industry in the United States	L. Cralley, H. Ayer, P. Enterline, A. Henschel, W. Lainhart	Dept. of Health, Education and Welfare, Public Health Service, Division of Occupational Health	

DATE	TITLE	AUTHOR(S)	PUBLISHER/ PUBLICATION	DATE RECEIVED
5/6/64	"Asbestos Exposure & Neoplasia"	I.J. Selikoff, M.D., Jacob Chrug, M.D., E. Cuyler Hammond, DSC	Journal of the American Medical Association	
10/23/64	Report and Recommendations of the Working Group on Asbestos & Cancer	Delegates who attended the meeting	International Union Against Cancer (UICC)	
10/12/68	"The Magic Mineral"		The New Yorker magazine	
11/69	"Asbestos-Public Not at Risk"	W. P. Howard	Asbestos Information Committee	
Undated	"2100 +/month for Asbestosis"	Unknown	Unknown	4/5/63
3/2/71	The Facts About Asbestos and Health	W. P. Raines	AIA/NA	11/22/71
10/71	"Asbestos, The Need For and Feasibility of Air Pollution Controls" (conclusion only received)		National Academy of Science	
1/18/72	"Thetford Highlights	Patricia Motherwell	Le Progress de Thetford	1/28/72

99. Defendant is not aware of any such letters.

100. Not applicable.

101. Not applicable.

102. Defendant objects generally to Plaintiff's Interrogatories insofar as they request Defendant to render a medical opinion. Defendant is not a medical expert and is not qualified to render medical opinions.

103. See Response to No. 102 above.

104. See Response to No. 102 above.

105. See Response to No. 102 above.

106. See Response to No. 102 above.

107. The best information available to this Defendant indicates that its predecessors-in-business became aware of the existence of the disease of asbestosis sometime prior to 1960. However, it was not until the mid-1960's that this Defendant's predecessors-in-business became aware that the disease of asbestosis could occur in insulators who have used asbestos insulation products in previous decades. Earlier studies had indicated that asbestosis was principally a problem of workers in mines and manufacturing facilities, occurring in those who were continually exposed to high concentrations of 100% raw asbestos fiber. Furthermore, it was not until the mid-1960's that this Defendant's predecessors-in-business became aware of the existence of any statistical connection between exposure to asbestos and the contraction of cancer.

108. No. See Defendant's previous answer regarding annual contributions to the AIA/NA, which organization may have conducted such research.

109. See Response to No. 102 above.

110. No.

111. When Celotex merged with Panacon Corporation in 1972, Panacon Corporation employees working with asbestos were wearing respirators when engaged in operations which, according to its job evaluation plan established by outside consulting industrial

hygenists, required respirators.

Defendant is informed and believes that predecessors-in-business made cloth-type respirators available to some plant employees as early as the 1930's. Some time prior to 1945, predecessors-in-business purchased filter-type respirators and instituted a job evaluation plan which required certain employees to wear respirators while working in specified areas. The filter-type respirators were those approved by the U.S. Bureau of Mines and manufactured by the Mine Safety Appliance Company in Pittsburgh, Pennsylvania.

Defendant presently uses respirators which have been approved by the U. S. Bureau of Mines. Defendant believes that, if used properly, these respirators will prevent the inhalation of asbestos dust and fibers. The manufacturer or the U. S. Bureau of Mines should be contacted for any additional information.

112. By the time The Celotex Corporation acquired Panacon, insulation mechanics using Defendant's products were using an asbestos-free high-temperature insulation, and Defendant did not therefore notify mechanics of the need to wear respirators. See previous interrogaotry responses regarding warnings. As to predecessors-in-business, Defendant does not have specific information in this area. Defendant is informed and believes that predecessors-in business first provided their won contract union employees with respirators in the late 1960's.

113. Please refer to Response No. 75 above.

114. The requested information is unknown at the present time. However, Defendant has gathered a great deal of information

indicating that the Asbestos Workers Union had knowledge of the suspected health hazards in the mid to late 1950's. Members of the Asbestos Workers Union should have been advised of the information which the union headquarters obtained. Defendant intends to assert all valid defenses available to it and properly raised in pleadings. Defendant has no intention of surrendering any valid defense at this point in the discovery process.

115. Neither Celotex nor its predecessors-in-business had employees or agents testify before any governmental agency regarding injury or death from exposure to asbestos. However, E. A. DiSalvo, Vice President of Panacon, a predecessor-in-business of The Celotex Corporation, made a statement before the Department of Labor on March 16, 1972, outlining our general compliance with the existing exposure standards and discussing the difficulty involved in meeting a lower standard.

116. Unknown at the present time.

117. Unknown at the present time.

118. Unknown at the present time.

119. Unknown at the present time.

120. Defendant intends to assert all valid defenses available to it and properly raised in pleadings. Please refer to previous pleadings. Defendant has no intention of surrendering any valid defenses at this point in the discovery process.

121. Discovery has not yet been completed in this and related cases, and Defendant is not presently able to state the requested information.

122. Defendant intends to assert all valid defenses available to it and properly raised in pleadings. Please refer to previous pleadings. Defendant has no intention of surrendering any valid defense at this point in the discovery process.

123. Discovery has not been completed in this and related cases, and Defendant is not presently able to state the requested information.

124. Defendant intends to assert all valid defenses available to it and properly raised in the pleadings. Please refer to previous pleadings. Defendant has no intention of surrendering any valid defense at this point in the discovery process.

125. Discovery has not been completed in this and related cases, and Defendant is not presently able to state the requested information.

126. Defendant intends to assert all valid defenses available to it and properly raised in pleadings. Please refer to previous pleadings. Defendant has no intention of surrendering any valid defenses at this point in the discovery process.

127. Discovery has not been completed in this and related cases, and Defendant is not presently able to state the requested information.

128. Defendant will not assert that prior to 1969 predecessors-in-business did not manufacture, sell or distribute asbestos insulation materials in the states listed in this interrogatory. However, Defendant will assert that Plaintiffs in this case were not exposed to any of the asbestos products manufactured or sold by Celotex.

129. See Defendant's answer to No. 128 above.

130. Due to record retention policies of Defendant's predecessors-in-business, complete records do not exist for area and time period requested. However, please refer to our current list of distributors/contractors attached and marked Exhibit "L". Also, product literature brochures of Defendant's predecessors-in-business may indicate distribution points in the requested area. These brochures will be made available to Plaintiff's counsel at a time and place mutually agreeable to both parties.

131. Defendant has no present information indicating that any of the Plaintiffs were employed by it or predecessors-in-business. In the event that The Celotex Corporation or one of its predecessors was the employer of a Plaintiff, Defendant will set up the Workmen's Compensation shield as a defense.

132. Predecessors-in-business began manufacturing Careytemp as an asbestos-free high temperature insulation product in 1969. This product line was developed because reinforcement with glass fiber made the product less susceptible to breakage. Also, this change was made as a result of the awareness of the controversy that existed concerning the health hazards associated with the use of asbestos-containing products.

133. Yes.

134. It would be virtually impossible for the Defendant to respond to these questions with specificity or any degree of accuracy or completeness, as numerous persons and various documents from many departments were consulted in answering these interrogatories. Furthermore, any attempt at gathering the requested information would

be unduly burdensome and not required by the rules of discovery. Therefore, Defendant objects to further response.

135. The Celotex Corporation distributes catalogs and the like in the Georgia area. Sales literature brochures have been prepared by the marketing department of Celotex and similar departments of its predecessors-in-business. These brochures were mailed to various distributors and contractors. Celotex will make available for inspection all product literature brochures in its possession for the years 1930 through the present. Brochures do not exist for each year inclusively.

136. Yes

137. Defendant objects to this interrogatory on the grounds that it is over broad and unduly burdensome. Specifically, the interrogatory is not confined to asbestos products, and for this reason alone any answer by this Defendant would be irrelevant to any of the issues presented in this case.

138.-142. Defendant objects to these interrogatories as being irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

143. Specific sales of asbestos products to any agency of the United States Government are presently unknown, but Defendant is informed and believes that for a period from approximately 1960 to 1964 Defendant's predecessors' major asbestos-containing insulation product was not approved as an acceptable asbestos product to the U. S. Government.

144 Yes.

145. Celotex's predecessors-in-business operated Contract Branches and Sales Units as early as 1937. Celotex's best information indicates that these Contract Units became a separate division in 1953. All Contract Units were sold and/or disbanded in 1970 or 1971. The purpose of these units was to secure contract jobs and apply the insulation at the job site.

146. Although Defendant does not have complete records of predecessors-in-business, Defendant is informed and believes that predecessors had an Atlanta branch contract unit of which the dates of operation are unknown. Defendant is informed and believes that the sale of asbestos products in this district was relatively small, because the market was dominated North Brothers, who were located in Atlanta.

144. - 151. The Defendant objects to these interrogatories on the grounds that they are overly broad, irrelevant and not calculated to lead to the discovery of admissible evidence. Without waiving its objection, the Defendant responds as follows:

Due to document retention policies of Defendant's predecessors-in-business and other reasons outlined in Defendant's Preliminary Statement, the Defendant does not have specific information in this regard.

148. See Response to No. 147 above.

149. Predecessors-in-business sold and/or disbanded their contract units prior to the Panacon/Celotex merger in 1972. The Celotex Corporation has no specific records to indicate that advice regarding asbestos health hazards was given to contract unit employees.

150. Not applicable.

151. Although Defendant does not have specific information in this area, Defendant is informed and believes that predecessors-in- business first provided contract unit employees with respirators in the late 1960's (1966/1967).

152. The Celotex Corporation does not employ individuals with experise in this area. Celotex and its predecessors-in-business have relied upon the U. S. Bureau of Mines and the Mine Safety Appliance Company for their expertise in furnishing respirators capable of preventing the inhalation of harmful quantifies of asbestos dust.

153. Unknown. Although Defendant has no reliable information in this regard, the respirator may have been the Dustfoe 66 manufactured by the Mine Safety Appliance Company and approved by the U. S. Bureau of Mines under approval No. 21B-113.

154. Because of lack of records of predecessors-in-business and various other reasons set forth in Defendant's Preliminary Statement, Defendant is unable to determine if predecessors-in-business disseminated the information set forth above in this interrogatory.

155. Because of lack of records of predecessors-in-business and various other reasons set forth in Defendant's Preliminary Statement, Defendant is unable to determine if Defendant's predecessors disseminated safe practice manuals to contract unit employees. Although it is unknown whether or not predecessors-in-business disseminated a safe practice manual to contract unit employees, it must be noted that in the late 1950's and early 1960's Defendant's

developed a premolded high-temperature insulation product that did not require cutting, sawing or grinding. In 1969 predecessors-in-business began manufacturing its major line, Careytemp, as an asbestos-free high-temperature insulation product. This action was done to make the product less susceptible to breakage and as a result of the general awareness of the growing controversy concerning health hazards associated with the use of asbestos products. The actual removal of asbestos from Careytemp came shortly after the general acceptance of Dr. Selikoff's study. Furthermore, before Defendant's predecessors developed an asbestos-free high-temperature insulation product and before premolded products were available, predecessors' products contained a significantly lower percentage of asbestos fiber than did mos of its competitors' products. Also, since the late 1950's predecessors had recommended the use of an asbestos-free cement in conjunction with their high-temperature asbestos insulation products, which further reduced the amount of airborne asbestos fiber in the work place.

156. The requested information is unknown due to lack of records of predecessors-in-business and for various reasons set forth above in the Preliminary Statement. Defendant is unable to determine if predecessors-in-business ever conducted or held safety meetings for their contract unit employees.

157. Although Defendant has not been able to develop specific information in this area, Defendant believes that contract unit employees of predecessors-in-business did receive instructions similar to those set forth above in this interrogatory.

158. Due to lack of information in records of predecessors-in-business, Defendant does not have specific information in this area. However, Defendant is informed and believes that predecessors-in-business first provided contract unit employees with respirators in the late 1960's.

159. Due to lack of information in records of predecessors-in-business, Defendant does not possess specific inforamtion in this area.

160. Please refer to Response No. 12 above.

161. Please refer to Response No. 12 above.

162. Please refer to Response No. 12 above. The requested documents are produced and attached hereto.

163. Please refer to Response No. 162 above.

164. Defendant believes that predecessors' contract unit employees did use some of the type devices described in this set of interrogatories. Please refer also to Response No. 155 above.

165. Due to lack of records of predecessors-in-business, Defendant does not have specific inforamtion on vacuum control devices and watering techniques designed to reduce asbestos dust in the air as described in this interrogatory.

166. Unknown. See Response 165 above.

167. No.

168. Defendant is not aware of predecessors-in-business having distributed any asbestos products to English firms or corporations.

169. No.

170. No.

171. Please refer to Response No. 66 above concerning workmen's compensation records and claims.

172. Please refer to Response No. 66 above.

173. Defendant is not aware of any files or records which would fall within the scope of this interrogatory.

174. and 175. Please refer to Defendant's Product List attached and identified previously as Exhibit "B".

TALMADGE, MALLIS & GREEN

John E. Talmadge

Suite 110
301 Perimeter Center North
Atlanta, Georgia 30346
(404) 393-8118

CORPORATE HISTORY

OF

THE PHILIP CAREY MANUFACTURING COMPANY

The Philip Carey Manufacturing Company was organized in Ohio in 1888 and remained an independent company until 1966, when Glen Alden Corporation (a wholly-owned subsidiary of Rapid-American Corporation) acquired control. In 1968, The Philip Carey Manufacturing Company changed its name to Philip Carey Corporation.

In April, 1970, Philip Carey Corporation was statutorially merged into Briggs Manufacturing Company, a Michigan corporation, and simultaneously, Briggs changed its name to Panacon Corporation.

On June 30, 1972, Panacon Corporation was merged into The Celotex Corporation, a Delaware corporation (a wholly-owned subsidiary of Jim Walter Corporation, a Florida corporation). This merger was also statutory, and The Celotex Corporation assumed the assets and ordinary liabilities of Panacon Corporation.

ASBESTOS-CONTAINING PRODUCTS
MANUFACTURED BY PHILLIP CAREY AND CELOTEX
SHOWING % ASBESTOS CONTENT

	Name, Trade Name and Description	Date of Manufacture	Contents
1	Carey Aircel Pipe	1906 to 1960	Asbestos corrugated paper, approximately 60% asbestos fiber, 25% organic fiber and starch, 15% sodium silicate
2	Careycel Pipe Covering & Block	1920's to 1960	Similar to Aircel
3	Carocel Pipe Covering	1925 to 1960	Same as Aircel, thicker
4	Defendex Pipe Covering	WW II	Corrugated sheets of asbestos paper, asbestos 60%, 25% organic felt, 15% sodium silicate
5	Carey Excel Pipe Covering & Block	1925 to 1960	Same as Aircel
6	Carey Glosscell Covering & Block	1935 to 1960	Aircel with shiny exterior
7	Carey Lennolite	1935 to 1969 not distributed in United States	Similar to Aircel
8	Carey Multi-Ply Pipe Covering & Block	1930 to 1960	Same as Carey Asbestos Sponge
9	Carey Asbestos Sponge Pipe Covering & Block	1930 to 1960	Asbestos sponge 2% to 3% corrugated asbestos paper, same as Aircel
10	85% Magnesia Pipe Covering, Block & Cement	1906 to 1961	Basic magnesium carbonate and asbestos fiber (11% to 15%)
11	Carey Super Light 85% Magnesia Pipe Covering & Block	1951 to 1958	Same as 85% magnesia (different mold process)
12	Carey Alltemp Pipe Covering & Block	1954 to 1958	60% Expanded perlite, 20% magnesia plastic, 10% bentonite clay and asbestos fiber (12%)
13	Carey Tempcheck Pipe Covering, Block & Cement	1942 to 1958	20% Magnesium plastic, 60% diatomaceous earth and 20% asbestos
14	Carey Hightemp #19 Pipe Covering, Block & Cement	1906 to 1958	80% Diatomaceous earth, 20% asbestos fiber

EXHIBIT "B"

15	Carey Hightemp #15 Pipe Covering, Block, & Cement	1906 to 1952	60% diatomaceous earth, 20% magnesia plastic, 20% asbestos
16	Carey Hightemp #12 Pipe Covering, Block & Cement	1906 to 1940	60% Diatomaceous earth, 20% magnesia, 20% asbestos fiber
17	Careytemp	1958 to Sept., 1969	Expanded perlite, bentonite clay and asbestos fiber (6% to 7%)
18	Careytemp Adhesive		Silicate of soda, additives and asbestos fiber
19	Careytemp Premolded Elbow Insulation	1963 to Sept., 1969	Same as Careytemp
20	Careytemp Aluminum Jacketed and Traced Pipe Insulation	1964 to 1968	Careytemp with an aluminum jacket or stainless steel jacket
21	Careytemp 2000 Block & Cement	1964 to Feb., 1970	Diatomaceous earth and asbestos fiber, 6.4%
22	Dual Careytemp Pipe Covering	1964 to 1968	2% Bentonite clay, 12% starch, 19% phenolic resin, 10% asbestos fiber, and 60% perlite
23	Carey Calcium Silicate Pipe & Block Insulation	1950 to 1955 not manufactured by Philip Carey (believed manufactured by Keene or Baldwin, Ehret & Hill) Brokered by Philip Carey	85% Calcium silicate, 15% asbestos
		1906-1969	10% - 100%
24	Carey 707 Cement	1909 to 1960	30% Asbestos fiber, 70% ground gypsum
25	Carey Super 606 Cement	1906 to 1960	20% Bentonite clay, 10% asbestos fiber, 10% kaolin clay & 60% mineral wool
26	Carey 100 Cement	1906 to 1967	60% asbestos fiber, bentonite clay and gypsum
27	Carey 303 Cement	1906 to 1960	60% Asbestos fiber, 20% gypsum, 20% bentonite clay

28	Carey M+-40 Cement	1950 to 1952	70% Mineral wool, 10% asbestos fiber, & 20% bentonite clay
29	Carey M+-50 Cement	1940 to 1967 (continued to broker Keene's M+-50 Cement)	Mineral wool, 10% asbestos fiber (asbestos removed from Keene M+-50 cement between 1972 and 1973)
30	Carey LF-20 Asbestos Cement	Unknown to 1960	60% to 70% Asbestos fiber, balance bentonite clay and hardeners
31	Carey Vitricel Cement (#10 & #19)	1940 to 1969	15% Asbestos fiber and bonding material
32	Carey A-1 Cement	Unknown (supplied only to Gulf Oil)	100% Long asbestos fibers
33	Carey A-101 Cement	1906 to 1960	Asbestos fiber, ground gypsum and bentonite clay
34	Carey Thermo-bord	1925 to 1969	Non-asbestos insulation board covered with asbestos cement
35	4.2 Carey Stone Corrugated Sheets	1925 to 1970	3/8" Corrugated sheet of Portland Cement & asbestos (22%)
36	Carey Industrial A-C Board	1925 to 1970	Portland Cement and 22% asbestos fiber
37	Careyflex Board	1925 to 1969	Portland Cement and 25% asbestos fiber
38	Carey Firefoil Board & Panel	1940 to 1960	Asbestos paper glued together with silicate (60% asbestos)
39	Vitricel Asbestos Sheets	1941 to 1950	60% Asbestos fiber saturated with sodium silicate and water-proofed
40	Carey Marine Panel	1941 to 1950	Aircel and asbestos cement (60% asbestos fiber)
41	Carey Panel Board	1941 to 1950	Corrugated asbestos felt (60% asbestos fiber)
42	Carey Stone Sheathing	1925 to 1969	22% Asbestos fiber & Portland cement

43	Asbestos Paper & Roll Board	1906 to 1982	60% Asbestos fiber, starch
44	Carey Corrugated Asbestos Paper	1906 to 1960	60% Asbestos fiber, 15% sodium silicate, & 25% organic fiber
		1906-82	
45	#1 (Hard) Millboard	1906 to April, 1982	35% Portland Cement, 65% Asbestos
46	#7 (Med. Hard) Millboard	1906 to April, 1982	35% Portland Cement, 65% Asbestos
47	Commercial Millboard	1906 to April, 1982	5% Clay, 30% Portland Cement, 65% Asbestos
48	PPG Millboard	1906 to April, 1982	5% Clay, 10% Portland Cement, 85% Asbestos
49	Mosler Safe Millboard	1906 to April, 1982	23% Portland Cement, 77% Asbestos
50	Steel Mill Millboard	1906 to April, 1982	5% Clay, 15% Portland Cement, 80% Asbestos
51	#10 Millboard	1906 to 1971	3-5% Starch, 95-97% Asbestos
52	Carey Fireguard	1950 to 1976 (lastly under Celotex name)	85% Asbestos, 15% asphalt
53	Carey Fireclad	1965 to 1982	Similar to Fireguard, of lighter construction (65% asbestos, 35% asphalt)
54	Thermotex-B	1906 to present (currently under Celotex name)	20% Asbestos fiber, emulsified asphalt & mineral stabilizers
55	228 Fibrated Emulsion	1906 to unknown	Bentonite clay, emulsified asphalt and 3.6% asbestos fiber
56	Carey Insulation Seal	1930 to present (currently under Celotex name)	Asbestos fibrated bituminous mastic, 20% asbestos, asphalt cutback, naphtha & mineral spirits
57	Fire Resistant Insulation Seal	Unknown	Asbestos fibrated rubber and polychlorinated resinous bituminous mastic

58	Carey Fibrous Adhesive	1906 to present (currently under Celotex name)	85% Sodium silicate and 15% asbestos fiber
59	Carey BTU Cement	1930 to 1965	Asbestos (25% to 30%) fibrated bituminous mastic
60	Carey Asbestos Felts	1960 to present (currently under Celotex name)	85% Asbestos fiber
61	Carey 45 pound Asbestos Waterproof Jacket	1906 to present (currently under Celotex name)	85% Asbestos & asphalt
62	Carey Asbestos Tank Jackets	1906 to 1945	60% Asbestos fiber, 25% organic fiber & 15% sodium silicate
63	Carey Duct-Asbestos Insulated Duct	1940 to 1947	15% Asbestos & 85% sodium silicate
64	Carey Duct Adhesive	1940 to 1947	15% Asbestos fiber, 85% sodium silicate
65	Carey Thermalite	Unknown to 1937	85% Asbestos & 15% sodium silicate
66	Carey Asbestos Rope & Wick	1925 to 1945	85% Asbestos fiber & 15% virgin cotton fiber

STATE OF INDIANA

Address Reply to:

Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana

State Board of Health
April 13, 1961

Mr. F. P. Ray
Indianapolis Contract Manager
Philip Carey Manufacturing Company
1432 Kentucky Avenue
Indianapolis, Indiana

Dear Mr. Ray:

At the request of Mr. R. J. Scott, Business Representative of Local 18 of the International Association of Heat and Frost Insulators and Asbestos Workers, a visit was made with you to the Indianapolis Power and Light Company's Harding Street plant by Mr. John Kehoe, Chemical Engineer, on March 10, 1961, to evaluate dust conditions associated with the installation of Careytemp insulation. The employees installing this insulation had experienced irritation to the eyes, nose and throat and were concerned about the potential health hazards associated with the exposures to dust from this material.

Observations during this visit indicated dust exposures were not great enough to constitute a health hazard. It was noted that hand saws were being used to cut the insulation. The irritation is probably due to the fiberglass in the insulation and can be minimized by instituting the usual precautionary measures employed when handling other fiberglass insulations. Since power driven saws would evolve greater dust concentrations than hand saws, they should be equipped with local exhaust ventilation to control the dust problem should they be used to cut the insulation. Under present operating conditions it is concluded that no serious dust exposures are associated with the installation of Careytemp insulation.

EXHIBIT "C"

JAMES O PIERCE Sc D
SETTLING LABORATORY
EDEN AND BETHESDA AVENUE
CINCINNATI, OHIO 45219

January 2, 1968

Mr. Arthur P. Mueller
Research Division
Philip Carey Manufacturing Company
320 South Wayne Avenue
Cincinnati, Ohio 45215

Dear Mr. Mueller:

We have completed our analyses of samples of air taken during fabrication of Carey Temp insulation at the Union Carbide Plant in Charleston, West Virginia. I do not know if you wish to have a formal report, complete with recommendations, etc., for methods of control of dust. Unless I hear otherwise, I will assume that this letter will suffice.

I do not feel it necessary to describe to you the conditions under which these samples were taken, since you were present during the entire operation. All of the impinger samples were breathing zone samples collected directly below the face of the operator. These samples are representative of an individual's exposure to the dust produced at the operation in question.

The impinger samples numbered 1 through 3 were collected during one "run," whereas numbers 4 through 6 were taken during the second cutting operation. The electrostatic precipitator samples were located near the saw table and could not be as representative of breathing zone samples as are the impinger samples. In addition, a high volume air sampler was used to collect dust from the air during the total period of time we were there. This sample naturally includes some down-time.

The samples were analyzed by standard procedures. A sample of dust collected with the high volume air sampler was prepared for examination by X-ray diffraction to determine the per cent of crystalline free silica and asbestos in the airborne dust. The X-ray diffraction pattern failed to indicate the presence of crystalline material in the dust. The probable limit of detection by X-ray diffraction for asbestos or quartz in untreated samples is approximately 5 per cent for each material.

EXHIBIT "D"

Thank you for your cooperation during this visit. If we may be of service to you in the future, please feel free to contact us.

Yours very truly,

Albert Edwards

Albert Edwards,
Industrial Hygiene Engineer

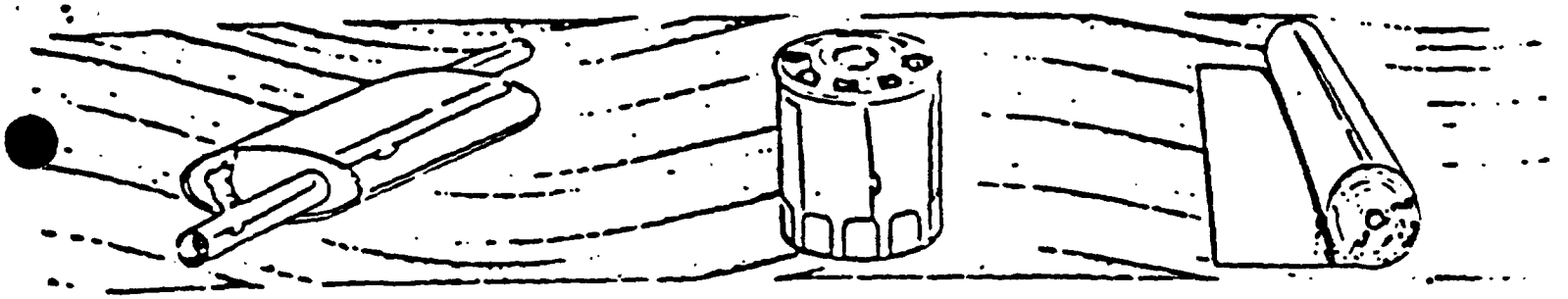
AE:cm

RESULTS OF SURVEY
AT THE UNION CARBIDE PLANT, CHARLESTON, WEST VIRGINIA
DURING FABRICATION OF PHILIP CAREY (CAREY TEMPE) INSULATION BOARD

DESCRIPTION AND LOCATION OF SAMPLER	MILLIONS OF PARTICLES PER CUBIC FOOT OF AIR Mppcf	MILLIGRAMS OF PARTIC PER CUBIC METER OF Mg/M^3
#1-Impinger- located at breathing zone of Mr. D. E. Raines, operator at saw #1 during unloading and cutting of insulation board	16.4	-
#2-Impinger- same as #1 except attached to other operator, Mr. W. L. Alford	15.9	-
#3-Impinger- located at breathing zone of Mr. J. Jordan, operator at saw #2 during 1st phase of sawing	19.5	-
#4-Impinger- located at breathing zone of Mr. W. L. Alford, operator at saw #2 during second phase of sawing operation	19.9	-
#5-Impinger- located at breathing zone of Mr. J. Jordan, operator at saw #2 during second phase of sawing operation	23.8	-
#6-Impinger- same as #5 except attached to other operator, Mr. H. Witt	27.3	-
#7-Electrostatic Precipitator Sampler- located appr. 5" above plate of saw #1 during first unloading and cutting cycle	8.65	64.3

DESCRIPTION AND LOCATION OF SAMPLER	MILLIONS OF PARTICLES PER CUBIC FOOT OF AIR Mppcf	MILLIGRAMS OF PARTICUL PER CUBIC METER OF AI Mc/M^3
#8-Electrostatic Precipitator- located at same location as #7 during clean-up operation between runs	5.5	29.1
#9-Electrostatic Precipitator- located at saw #2, left side, appr. 8-10" above plate of saw during second phase of cutting operation	3.0	21.1
#10-High Volume Air Sampler using fluted filter- located at the right side, appr. 4' from saw #1 during entire operations	-	37.3*

* X-Ray Diffraction indicates no detectable crystalline material present in this sample



Specialty Asbestos and Organic Papers

DESCRIPTION: Celotex produces a number of Specialty Asbestos and Organic Papers for a broad range of applications in varied industries. Briefly, these materials include:

Asbestos Resin Saturating Paper — A phenolic resin saturating type paper designed to be impregnated with thermo-setting resin. Saturated material is usually wrapped or rolled, then heated to cure the resin and form a hard, heat-resistant component.

Asbestos Asphalt Saturating Paper — Designed for use as a base for roofing and dampproofing membrane by saturating with roofing grades of asphalt and tar pitch.

Asbestos Pipeline Wrapping Paper — Reinforced with continuous filament glass fiber strands for high sheet strength. This material has many industrial uses in addition to its principle application as a corrosion-preventing pipeline wrap.

Asbestos Paper, Inorganic Type — A material with low organic fiber content to reduce smoke and odor emission.

Asbestos Laminating Paper — This product contains natural fiber for additional strength. It is specially formulated for use with galvanized steel pipe.

Asbestos Muffler Paper — This asbestos paper is indented, or waffled, to provide greater overall caliper and flexibility. It is used widely in the automotive industry.

Non-Flammable Protective Paper — Thin, non-flammable asbestos paper for use as a flame retardant in decorative wall paneling.

Asbestos Flooring Backer Sheet — Latex bound asbestos paper of the beater addition type which contributes resiliance, dimensional stability and durability to composite floor covering materials.

Filter Felt — Used as a filtering medium in automotive lubricating oil filters.

Organic Flooring Felt — Saturated with high quality asphalt and painted one side with a primer, this product is used by the flooring manufacturers as a base layer for enamel print flooring.

Celotex Asbestos Gasket Materials — Celotex manufactures a variety of gasket papers that are especially formulated to meet demanding customer specifications. Typically these materials are made of asbestos fibers uniformly coated with synthetic rubber latices selected for specific requirements. They are resilient, non-corrosive, fungus resistant and dimensionally stable.

CAUTION: Celotex specialty products contain asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm.

EXHIBIT "E"

Microscopic examination of the samples of dust indicated the presence of some fibers, but it was not always possible to differentiate between glass fibers or asbestos fibers. As you are aware, the threshold limit value for asbestos is 5 million particles per cubic foot of air and for inert or nuisance particulates this value is raised to 50 mppcf or 15 mg/m^3, whichever is the smaller (source: Threshold Limit Values for 1967, ACGIH). Since asbestos is known to be an ingredient of the parent material my personal recommendation would be to use the lower value even though the analysis indicated that the dust contained less than 5 per cent asbestos.

The results of the sampling are given in the attached table. If additional information is required, please do not hesitate to let me know. Also enclosed is a statement of charges involved including charges for analyses incurred by the Kettering Laboratory. Please make the check payable directly to me personally for the full amount and I will reimburse the Laboratory.

Sincerely yours,

J. O. Pierce, Sc.D.
Assistant Professor of
Environmental Health

JOP:egm

Enclosures

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Product Application Form

Your Name _____ Date _____

Company _____

Address _____

City _____ State _____ Zip _____

Name of application _____

Type of material, if known _____

Quantity _____

How often is this quantity purchased? _____

DESIGN REQUIREMENTS:

What is the intended use of the material? _____

_____

What conditions (temperature, exposure, impact, etc.) must the material withstand? _____

_____

What fluids or gases will material be exposed to? _____

Please attach specification sheet, if available.

PART DESCRIPTION:

1. *Rectangular sheets without holes:* Give length _____, width _____, thickness _____, tolerances _____
2. *Roll goods:* Give outside diameter _____, core diameter _____, width _____, approximate weight per roll _____, thickness _____, dimensional tolerances _____
3. *All other nonstandard parts:* Attach sketches or prints, identified by part number: # _____ Dimensional tolerances must be shown.

PACKAGING: check all applicable boxes according to requirements:

1. Maximum gross weight allowed per unit package _____
2. On pallets? ☐ Returnable? ☐ Nonreturnable? ☐
3. In cartons? ☐
4. Other? ☐ Specify _____

SHIPPING INSTRUCTIONS: (include preference of carrier, if any.)

_____

_____

OTHER INFORMATION:

Asbestos Millboard

DESCRIPTION: Asbestos Millboard is made from Canadian asbestos fibre pulp mixed with binding materials and formed in sheets. Commercial Millboard is produced in two grades, No. 1 Hard and No. 7 Medium. No. 1 Grade withstands temperatures up to 1000°F., and No. 7 Grade withstands temperatures up to 800°F. These two grades satisfy the vast majority of requirements. Special grades can be developed by Celotex laboratories. Asbestos Millboard with pin-point (knurled) finish can also be supplied.

SIZES: Asbestos Millboard is furnished in 42" x 48" sheets in the following thicknesses:

Thickness (Inches)	Pounds* Per Sheet	Ounces* Per Sq. Ft.
1/16	3.9	4.5
5/64	4.9	5.8
3/32	5.9	6.7
1/8	7.9	9.0
5/32	9.4	10.7
3/16	11.8	13.5
1/4	15.8	18.1
5/16	19.7	22.5
3/8	23.6	27.0
1/2	31.5	36.0
5/8**	37.6	43.0
3/4**	45.2	51.7

APPLICATIONS: Asbestos Millboard is used extensively in the electric heating field and glass industry. It may be used in fire screens and partitions, as a lining for ceilings, walls, floors, elevator shafts, ranges, stoves, grates, electric ovens, sterilizers and roasters.

Other typical applications for Asbestos Millboard include:

Sheet glass lehr rolls

Float glass conveyor rolls

Gaskets

Cores for metal-clad doors

Stainless steel conveyor rolls

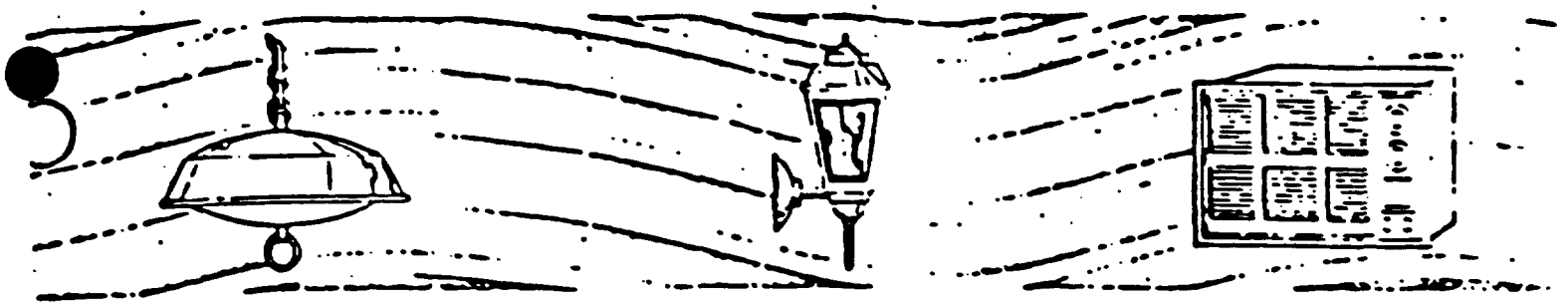
Table and stove pads and mats

Incinerators, home and commercial

Heater and furnace lining

Safe and strongbox lining

Electric switch box lining



Asbestos Insulating Paper Specialties

CORRUGATED ASBESTOS PAPER

DESCRIPTION: Corrugated Asbestos Paper consists of a sheet of asbestos paper, which has been corrugated, firmly cemented to a flat backing sheet of like material. The two sheets are joined by a suitable adhesive.

Corrugated Asbestos Paper is a very light and flexible form of insulation, adaptable for wrapping around curved surfaces.

SIZES: Corrugated Asbestos Paper is furnished in coarse corrugations (¼" thick per ply) in 36" to 37" wide rolls. It can be ordered in 250 sq. ft. or 500 sq. ft. rolls.

APPLICATIONS: Corrugated Asbestos Paper can be used wherever a light and flexible, yet efficient, insulating material is required. It is especially valuable for wrapping hot air furnace pipes, and as insulation for hot air ducts in blower systems for large buildings.

CAREYFOIL

DESCRIPTION: Careyfoil is made from ¼" Corrugated Asbestos Paper with a layer of aluminum foil adhered to the flat side only. This method of construction adds materially to its insulation value.

Underwriters Approved: Material available upon request.

SIZES: Careyfoil is furnished in 36" and 37" wide rolls, each containing 250 sq. ft. of material.

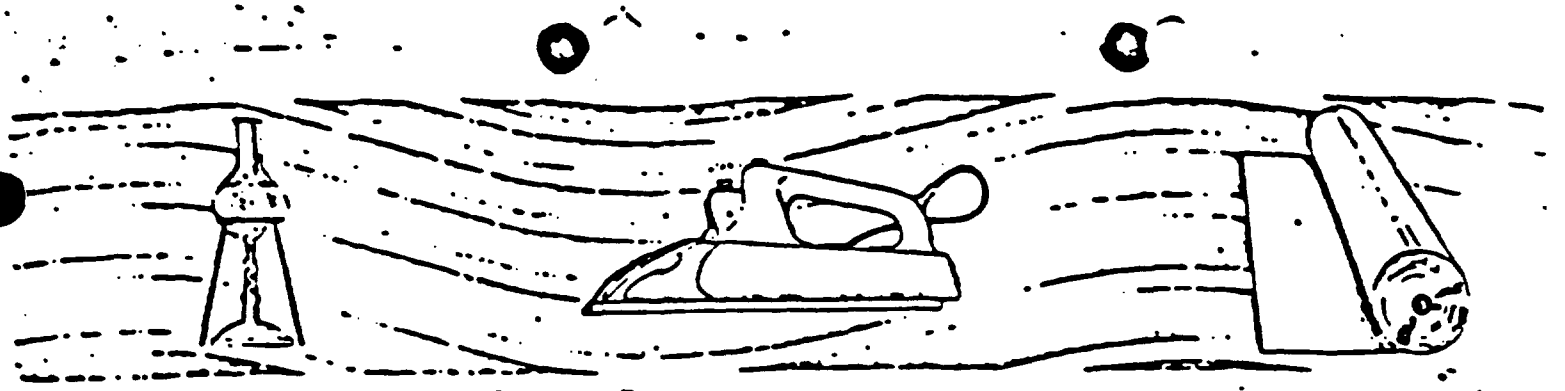
APPLICATIONS: Careyfoil is used in the construction of low and medium heat ovens for residential and commercial use. It is also used with furnaces and hot water heaters.

FOIL-FACED ASBESTOS PAPER

DESCRIPTION: Foil-Faced Asbestos Paper consists of Commercial Asbestos Paper with aluminum foil adhered to one or both sides. One side foil paper is furnished in roll form, two side material is usually provided in sheets.

SIZES: Foil-Faced Asbestos Paper is furnished in 36" or 37" wide rolls. It can be ordered in 500 or 1,000 sq. ft. rolls.

APPLICATIONS: Foil-Faced Asbestos Paper is used as insulation and a lighting reflector for lighting fixtures, as insulation for moderate temperature applications such as air conditioners, vending machines, radiators, baseboard heating units, etc. It is also a popular insulator for pipes and ducts.



Commercial Asbestos Paper and Rollboard

DESCRIPTION: Asbestos Paper and Rollboard are composed of Canadian asbestos fibre combined with a small quantity of extremely strong binding material. A specially-equipped paper-making machine turns the slurried components into sheets. The sheets are thoroughly dried and, finally, calendered to a smooth finish. Asbestos Paper and Rollboard are strong, flexible, fire-resistant sheets suitable for varied applications throughout industry.

Asbestos Paper and Rollboard are of one type and vary only in thickness and width of sheet rolls.

Gummed or plain Asbestos Paper Tape, made from standard 12-lb. stock, is also available.

SIZES: Asbestos Paper and Rollboard are furnished in standard widths of 18", 24", 36" and 37½". Special sizes can be made to order. Standard weights and thicknesses of sheets are.

Lbs./100 Sq. Ft. (10%)	Approximate Thickness—Inches
6	.015
8	.019
10	.022
12	.026
14	.029
16	.032
32	.0625
50	.094
64	.125

Asbestos Paper Tape is available in 2" and 3" wide rolls—each 84 feet long. The Tape is made from standard 12-lb stock and may be ordered gummed or plain.

APPLICATIONS: Asbestos Paper and Rollboard are satisfactory for a great variety of purposes. The 6 and 8-lb. papers are used in the manufacture of various pipe and electrical insulations. The 10 and 12-lb. papers are used for wrapping hot air furnace pipes. Heavier weights are used for lining stoves, ovens, gas ranges and for making gaskets, filters and discs.

Other prospective applications for this material might include

- Laboratory equipment insulators
- Dental molding forms
- Boiler jackets
- Protected metal siding
- Kitchen hot pads
- Table pads
- Electrical appliances
- Safes and strongboxes
- Dry kiln insulators
- Flooring base
- Welding mats and insulators
- Plastic roof system base
- Filing cabinet lining
- Household radiator covers
- Culvert pipe protection

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS ROLLBOARD

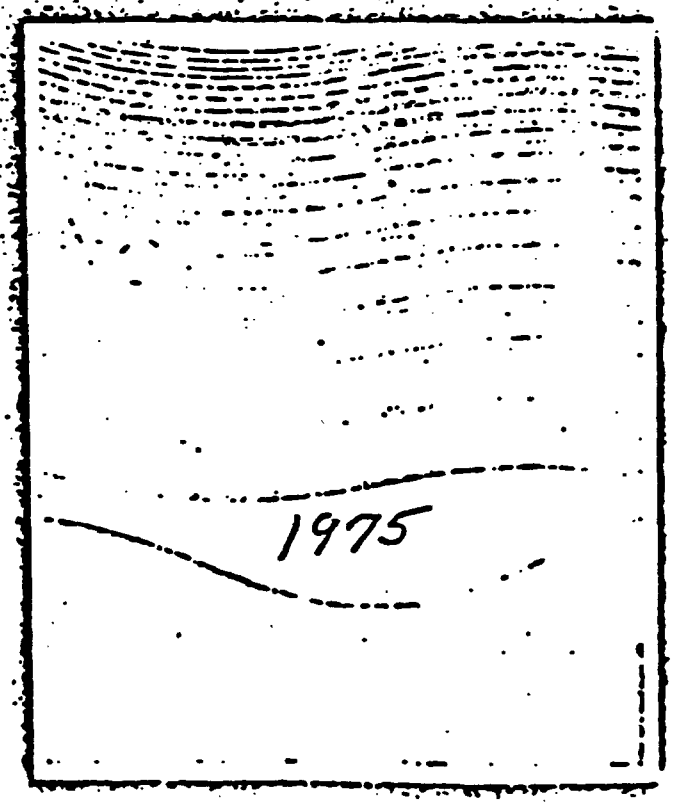
	3/32"	1/8"
Weight, Pounds	49-52	57-67
Thickness, Inches	.094	.123
Tensile Strength, Dry Pounds, With Grain	35	35
Mullen Strength, Pounds	32	32
Moisture, Per Cent	3	5

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS PAPER

	6 lb.	8 lb.	10 lb.	12 lb.	14 lb.	16 lb.	3/64"	1/16"
Weight, pounds per 100 sq. ft.	5.5-6.5	7.5-8.5	9.3-10.7	11-12.6	13-15	15-17	23-26	30-3
Thickness, Inches	.015	.018	.022	.025	.028	.032	.045	060-064
Tensile Strength, Dry Pounds, With Grain	14-16	14-16	14-16	15-17	16-18	16-18	18-20	20
Mullen Strength, Pounds	10	11	12	12	14	14	20	20
Moisture, Per Cent	3	3	3	3	3	3	3	3

Celotex

Industrial Specialty Products



1975

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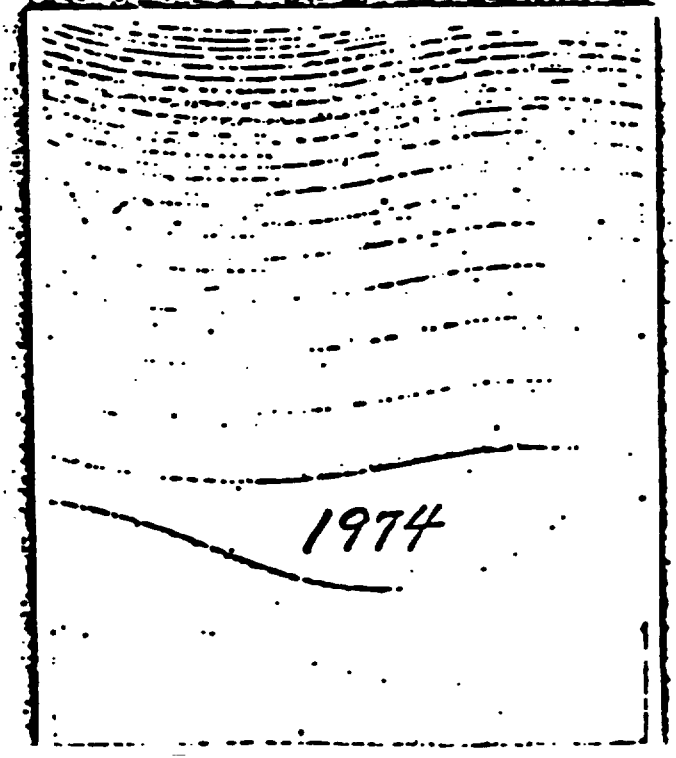
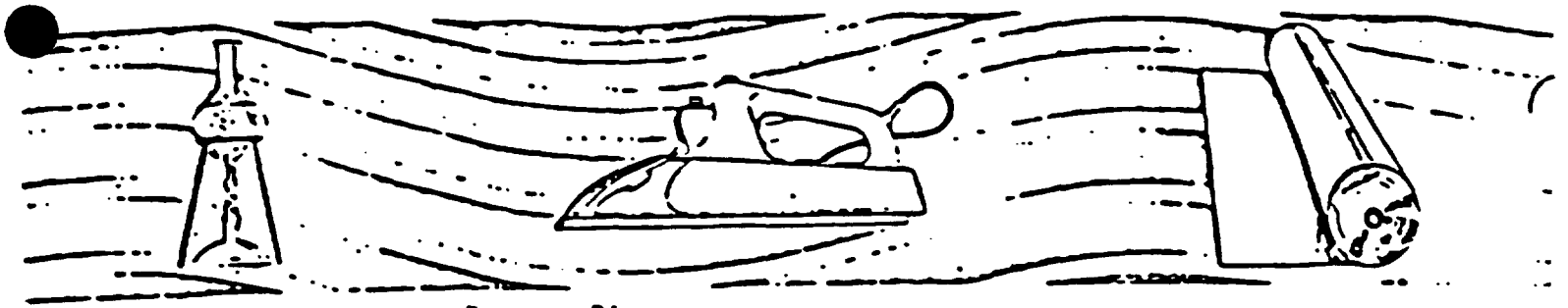
EXHIBIT

Celotex

Industrial Specialty Products





Commercial Asbestos Paper and Rollboard

DESCRIPTION: Asbestos Paper and Rollboard are composed of Canadian asbestos fibre combined with a small quantity of extremely strong binding material. A specially-equipped paper-making machine turns the slurried components into sheets. The sheets are thoroughly dried and, finally, calendered to a smooth finish. Asbestos Paper and Rollboard are strong, flexible, fire-resistant sheets suitable for varied applications throughout industry.

Asbestos Paper and Rollboard are of one type and vary only in thickness and width of sheet rolls.

Gummed or plain Asbestos Paper Tape, made from standard 12-lb. stock, is also available.

SIZES: Asbestos Paper and Rollboard are furnished in standard widths of 18", 24", 36" and 37½". Special sizes can be made to order. Standard weights and thicknesses of sheets are:

Lbs./100 Sq. Ft. (10%)	Approximate Thickness—Inches
6	.015
8	.019
10	.022
12	.026
14	.029
16	.032
32	.0625
50	.094
64	.125

Asbestos Paper Tape is available in 2" and 3" wide rolls — each 84 feet long. The Tape is made from standard 12-lb. stock and may be ordered gummed or plain.

APPLICATIONS: Asbestos Paper and Rollboard are satisfactory for a great variety of purposes. The 6 and 8-lb. papers are used in the manufacture of various pipe and electrical insulations. The 10 and 12-lb. papers are used for wrapping hot air furnace pipes. Heavier weights are used for lining stoves, ovens, gas ranges and for making gaskets, filters and discs.

Other prospective applications for this material might include

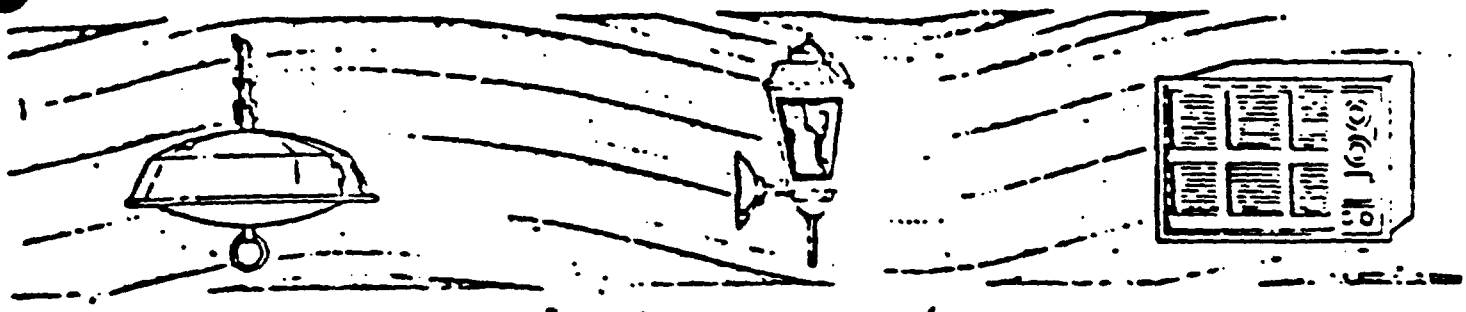
- Laboratory equipment insulators
- Dental molding forms
- Boiler jackets
- Protected metal siding
- Kitchen hot pads
- Table pads
- Electrical appliances
- Safes and strongboxes
- Dry kiln insulators
- Flooring base
- Welding mats and insulators
- Plastic roof system base
- Filing cabinet lining
- Household radiator covers
- Culvert pipe protection

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS ROLLBOARD

	3/32"	1/8"
Weight, Pounds	48-52	57-67
Thickness, Inches	.094	.123
Tensile Strength, Dry Pounds, With Grain	35	35
Mullen Strength, Pounds	32	32
Moisture, Per Cent	3	5

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS PAPER

	6 lb.	8 lb.	10 lb.	12 lb.	14 lb.	16 lb.	3/64"
Weight, pounds per 100 sq. ft.	5.5-6.5	7.5-8.5	9.3-10.7	11-12.6	13-15	15-17	23-26
Thickness, Inches	.015	.018	.022	.025	.028	.032	.045
Tensile Strength, Dry Pounds, With Grain	14-16	14-16	14-16	15-17	16-18	16-18	18-20
Mullen Strength, Pounds	10	11	12	12	14	14	20
Moisture, Per Cent	3	3	3	3	3	3	3



Asbestos Insulating Paper Specialties

CORRUGATED ASBESTOS PAPER

DESCRIPTION: Corrugated Asbestos Paper consists of a sheet of asbestos paper, which has been corrugated, firmly cemented to a flat backing sheet of like material. The two sheets are joined by a suitable adhesive.

Corrugated Asbestos Paper is a very light and flexible form of insulation, adaptable for wrapping around curved surfaces.

SIZES: Corrugated Asbestos Paper is furnished in coarse corrugations (⅛" thick per ply) in 36" to 37" wide rolls. It can be ordered in 250 sq. ft. or 500 sq. ft. rolls.

APPLICATIONS: Corrugated Asbestos Paper can be used wherever a light and flexible, yet efficient, insulating material is required. It is especially valuable for wrapping hot air furnace pipes, and as insulation for hot air ducts in blower systems for large buildings.

CAREYFOIL

DESCRIPTION: Careyfoil is made from ⅛" Corrugated Asbestos Paper with a layer of aluminum foil adhered to the flat side only. This method of construction adds materially

SIZES: Careyfoil is furnished in 36" and 37" wide rolls, ea containing 250 sq. ft. of material.

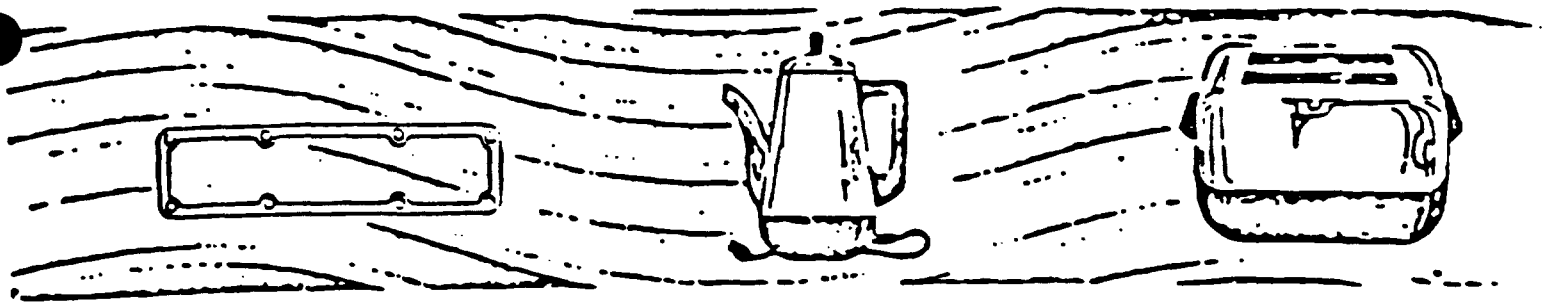
APPLICATIONS: Careyfoil is used in the construction low and medium heat ovens for residential and commerc use. It is also used with furnaces and hot water heaters.

FOIL-FACED ASBESTOS PAPER

DESCRIPTION: Foil-Faced Asbestos Paper consists Commercial Asbestos Paper with aluminum foil adherec one or both sides. One side foil paper is furnished in form, two side material is usually provided in sheets.

SIZES: Foil-Faced Asbestos Paper is furnished in 36 37" wide rolls. It can be ordered in 500 or 1,000 sq. ft. r

APPLICATIONS: Foil-Faced Asbestos Paper is use insulation and a lighting reflector for lighting fixtures, a sulation for moderate temperature applications such a conditioners, vending machines, radiators, baseboard ing units, etc. It is also a popular insulator for pipes



Asbestos Millboard

DESCRIPTION: Asbestos Millboard is made from Canadian asbestos fibre pulp mixed with binding materials and formed in sheets. Commercial Millboard is produced in two grades, No. 1 Hard and No. 7 Medium. No. 1 Grade withstands temperatures up to 1000°F., and No. 7 Grade withstands temperatures up to 800°F. These two grades satisfy the vast majority of requirements. Special grades can be developed by Celotex laboratories. Asbestos Millboard with pin-point (knurled) finish can also be supplied.

SIZES: Asbestos Millboard is furnished in 42" x 48" sheets in the following thicknesses:

Thickness (Inches)	Pounds* Per Sheet	Ounces* Per Sq. Ft.
1/16	4.1	4.7
5/64	5.1	5.8
3/32	6.2	7.1
1/8	8.3	9.5
5/32	10.3	11.8
3/16	12.4	14.2
1/4	16.5	18.9
5/16	20.6	22.9
3/8	24.8	28.3
1/2	33.0	37.7
5/8**	39.0	44.6
3/4**	44.5	50.9

APPLICATIONS: Asbestos Millboard is used extensive in the electric heating field and glass industry. It may used in fire screens and partitions, as a lining for ceilin walls, floors, elevator shafts, ranges, stoves, grates, elec ovens, sterilizers and roasters.

Other typical applications for Asbestos Millboard include:

Sheet glass lehr rolls

Float glass conveyor rolls

Gaskets

Cores for metal-clad doors

Stainless steel conveyor rolls

Table and stove pads and mats

Incinerators, home and commercial

Heater and furnace lining

Safe and strongbox lining

Electric switch box lining

Product Application Form

Your Name _____ Date _____

Company _____

Address _____

City _____ State _____ Zip _____

Name of application _____

Type of material, if known _____

Quantity _____

How often is this quantity purchased? _____

DESIGN REQUIREMENTS:

What is the intended use of the material? _____

_____

What conditions (temperature, exposure, impact, etc.) must the material withstand? _____

_____

What fluids or gases will material be exposed to? _____

Please attach specification sheet, if available.

PART DESCRIPTION:

1. *Rectangular sheets without holes:* Give length_____, width_____, thickness_____, tolerances_____
2. *Roll goods:* Give outside diameter_____, core diameter_____, width_____, approximate weight per ro _____, thickness_____, dimensional tolerances_____
3. *All other nonstandard parts:* Attach sketches or prints, identified by part number: # _____ Dimensional tolerances must be shown.

PACKAGING: check all applicable boxes according to requirements:

1. Maximum gross weight allowed per unit package _____
2. On pallets? ☐ Returnable? ☐ Nonreturnable? ☐
3. In cartons? ☐
4. Other? ☐ Specify _____

SHIPPING INSTRUCTIONS: (include preference of carrier, if any.)

_____

_____

OTHER INFORMATION:

Die charge (if required). Should these charges be listed separately? _____

or included as part of the selling price? _____

Who is present supplier? _____

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Postage will be paid by

THE CELOTEX CORPORATION
1500 NORTH DALE MABRY
TAMPA, FLORIDA 33622

ATTN: INDUSTRIAL MARKETING DEPARTMENT

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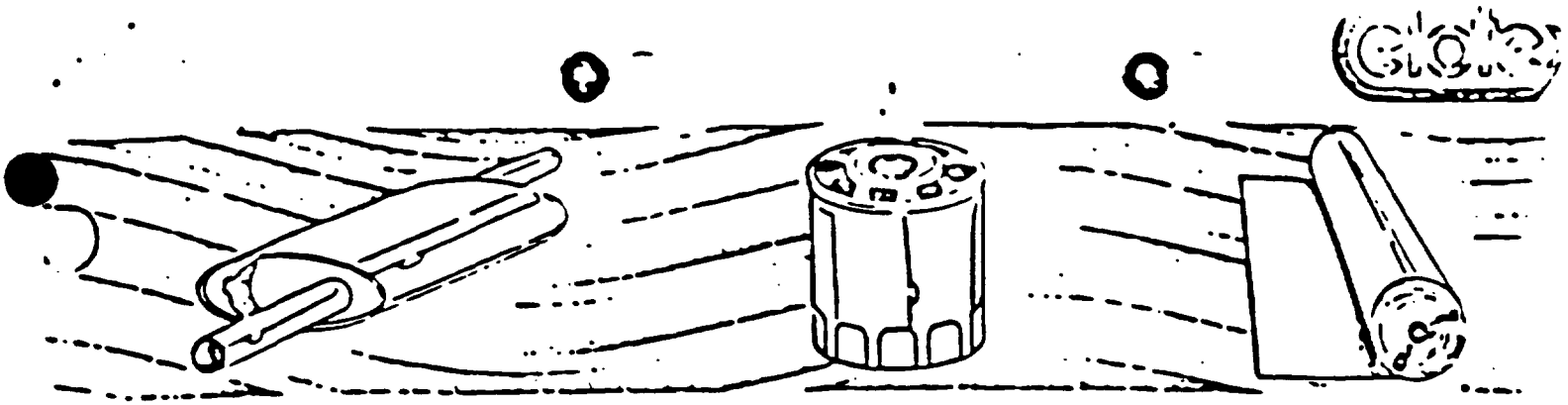


Specialty Asbestos and Organic Papers

DESCRIPTION: Celotex produces a number of Specialty Asbestos and Organic Papers for a broad range of applications in varied industries. Briefly these materials include:

Asbestos Resin Saturating Paper — A phenolic resin saturating type paper designed to be impregnated with thermo-setting resin. Saturated material is usually wrapped or rolled, then heated to cure the resin and form a hard, heat-resistant component.

Asbestos Asphalt Saturating Paper — Designed for use as a base for roofing and damppproofing membrane by saturating with roofing grades of asphalt and tar pitch.

Asbestos Pipeline Wrapping Paper — Reinforced with continuous filament glass fiber strands for high sheet strength. This material has many industrial uses in addition to its principle application as a corrosion-preventing pipeline wrap.

Asbestos Paper, Inorganic Type — A material with low organic fiber content to reduce smoke and odor emission.

Asbestos Laminating Paper — This product contains natural fiber for additional strength. It is specially formulated for use with galvanized steel pipe.

Asbestos Muffler Paper — This asbestos paper is dented, or waffled, to provide greater overall caliper a flexibility. It is used widely in the automotive industry.

Non-Flammable Protective Paper — Thin, non-fla mable asbestos paper for use as a flame retardant in deco tive wall paneling.

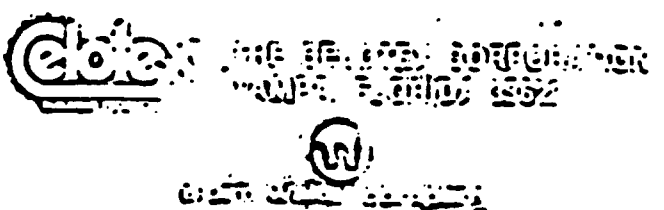
Asbestos Flooring Backer Sheet — Latex bound asbe tos paper of the beater addition type which contributes siliance, dimensional stability and durability to compos floor covering materials.

Filter Felt — Used as a filtering medium in automoti lubricating oil filters.

Organic Flooring Felt — Saturated with high quality a phalt and painted one side with a primer, this product is us by the flooring manufacturers as a base layer for enam print flooring.

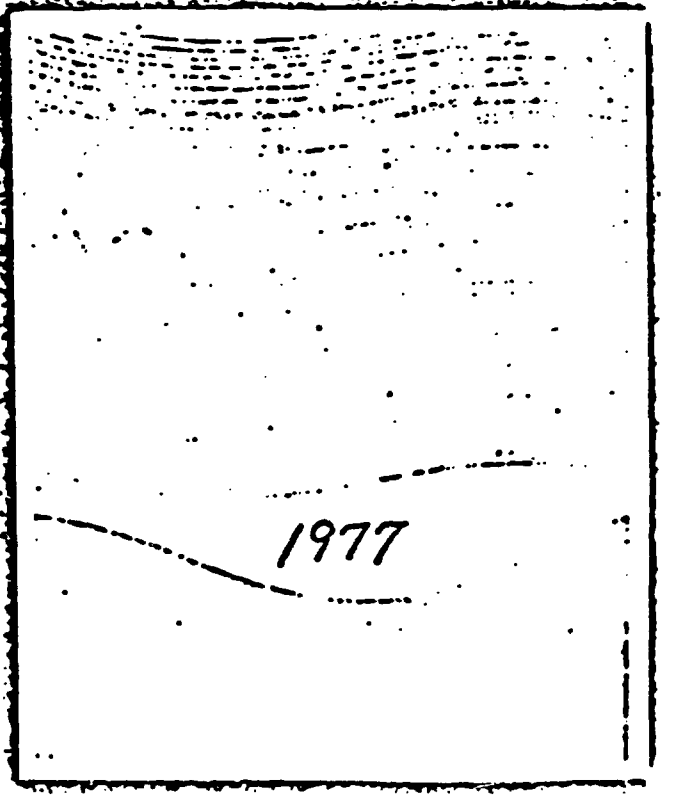
Celotex Asbestos Gasket Materials — Celotex man factures a variety of gasket papers that are especially form lated to meet demanding customer specifications. Typica these materials are made of asbestos fibers uniformly coat with synthetic rubber latices selected for specific requir ments. They are resilient, non-corrosive, fungus resistant a dimensionally stable.

CAUTION: Celotex specialty products contain asbestos fibers. Avoid creating dust. Breathing asbestos dust may cau serious bodily harm.



Celotex

Industrial Paper and Felt Products



1977

Commercial Asbestos* Paper and Rollboard

DESCRIPTION: Asbestos Paper and Rollboard are composed of Canadian asbestos fiber combined with a small quantity of extremely strong binding material. A specially-equipped paper-making machine turns the slurried components into rolls. The material is thoroughly dried and finally calendered to a smooth finish. Asbestos Paper and Rollboard are strong, flexible fire-resistant products suitable for varied applications throughout industry.

Asbestos Paper and Rollboard are of one type and vary only in thickness and width of rolls.

Asbestos Paper Tape is available in 2" and 3" wide rolls — each 84 feet long. The Tape is made from standard 12-lb. stock.

APPLICATIONS: Asbestos Paper and Rollboard are satisfactory for a great variety of purposes. The 6 and 8-lb. papers may be used in the manufacture of various insulations. The 10 and 12-lb. papers have been used for wrapping hot air furnace pipes.

SIZES: Asbestos Paper and Rollboard are furnished in standard widths of 18", 24", 36" and 37½". Special sizes can be made to order. Standard weights and thicknesses of sheets are:

TYPICAL CHARACTERISTICS COMMERCIAL ASBESTOS ROLLBOARD

	3/32"	1/8"
Weight Pounds	48-52	57-67
Thickness Inches, Nominal	.094	.123
Tensile Strength, Dry Pounds Per Inch Width, Grain Machine	35	35
Mullen Strength** Lbs per inch	32	32
Moisture Per Cent Maximum	3	5

TYPICAL CHARACTERISTICS COMMERCIAL ASBESTOS PAPER

	6 lb.	8 lb.	10 lb.	12 lb.	14 lb.	16 lb.	1/16"**
Weight Pounds per 100 sq. ft.	5.5-6.5	7.5-8.5	9.3-10.7	11-12.6	13-15	15-17	30-34
Thickness Inches Nom.	.015	.018	.022	.025	.029	.032	.060-.064
Tensile Strength Dry Pounds in With Grain Dir.	14	14	14	15	16	16	20
Mullen Strength** Pounds in.	10	11	12	12	14	14	20
Moisture Per Cent	3	3	3	3	3	3	3

Asbestos Insulating* Paper Specialties

CORRUGATED ASBESTOS PAPER

DESCRIPTION: Corrugated Asbestos Paper consists of a sheet of asbestos paper, which has been corrugated firmly cemented to a flat backing sheet of like material. The two sheets are joined by a suitable adhesive.

Corrugated Asbestos Paper is a very light and flexible form of insulation, adaptable for wrapping around curved surfaces.

SIZES: Corrugated Asbestos Paper is furnished in coarse corrugations (¼" thick per ply) in 36" to 37" wide rolls. It can be ordered in 250 sq. ft. or 500 sq. ft. rolls.

APPLICATIONS: Corrugated Asbestos Paper can be used wherever a light and flexible, yet efficient, insulating material is required.

CAREYFOIL

DESCRIPTION: Careyfoil is made from ⅛" Corrugated Asbestos Paper with a layer of aluminum foil adhered to the flat side only. This method of construction adds materially to its insulation value.

Underwriters Classified. Material available upon request.

SIZES: Careyfoil is furnished in 36" and 37" wide rolls, each containing 250 sq. ft. of material.

APPLICATIONS: Careyfoil is used in the construction of furnaces for residential and commercial use.

FOIL-FACED ASBESTOS PAPER

DESCRIPTION: Foil-Faced Asbestos Paper consists of Commercial Asbestos Paper with aluminum foil adhered to one or both sides. One side foil paper is furnished in roll form, two side material is usually provided in sheets.

SIZES: Foil-Faced Asbestos Paper is furnished in 36" or 37" wide rolls. It can be ordered in 500 or 1,000 sq. ft. rolls.

APPLICATIONS: Foil-Faced Asbestos Paper is used as insulation and a lighting reflector for lighting fixtures, as insulation for moderate temperature applications. It is also an insulator for pipes and ducts.

UNDERWRITERS LABORATORIES INC.®
CLASSIFIED
SHEATHING MATERIAL
FIRE HAZARD CLASSIFICATION

Flame Spread	10
Fuel Contributed	0

Asbestos* Millboard

DESCRIPTION: Asbestos Millboard is made from Canadian asbestos fibre pulp mixed with binding materials and formed in sheets. Commercial Millboard is produced in two grades. No. 1 Hard and No. 7 Medium. No. 1 Grade withstands temperatures up to 1000°F. and No. 7 Grade withstands temperatures up to 800°F. These two grades satisfy the vast majority of requirements. Special grades can be developed by Celotex laboratories. Asbestos Millboard with pin-point (knurled) finish can also be supplied.

SIZES: Asbestos Millboard is furnished in 42" x 48" sheets in the following thicknesses:

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS MILLBOARD

Thickness (Inches)	Pounds*** Per Sheet	Ounces*** Per Sq. Ft.
1/16	3.9	4.5
5/64	4.9	5.6
3/32	5.9	6.7
1/8	7.9	9.0
5/32	9.4	10.7
3/16	11.8	13.5
1/4	15.8	18.1
5/16	19.7	22.5
3/8	23.6	27.0
1/2	31.5	36.0
5/8 †††	37.6	43.0
3/4 †††	45.2	51.7
1 †††	60.2	68.8

***Typical weights.
†††Available in laminated form on a special order basis only.

APPLICATIONS: Asbestos Millboard is used extensively in the electric heating field and glass industries.

Characteristics, properties, or performance of materials or systems herein described are based on data obtained under controlled test conditions. Celotex makes no warranties, expressed or implied, as to their characteristics, properties, or performance under any variations from such conditions in actual construction. The Celotex Corporation assumes no responsibility for the effects of structural movement.

***WARNING**

These products contain asbestos fiber. The Occupational Safety and Health Administration (OSHA), an agency of the United States Government, believes that repeated inhalation of asbestos fiber is a health hazard and may cause various diseases including cancer and asbestosis.

Specialty Asbestos* and Organic Papers

DESCRIPTION: Celotex produces a number of Specialty Asbestos and Organic Papers for a broad range of applications in varied industries. Briefly these materials include:

Asbestos Resin Saturating Paper — A phenolic resin saturating type paper designed to be impregnated with thermosetting resin. Saturated material is usually wrapped or rolled then heated to cure the resin and form a hard, heat-resistant component.

Asbestos Asphalt Saturating Paper — Designed for use as a base for roofing and dampproofing membranes by saturating with roofing grades of asphalt and tar pitch.

Asbestos Paper, Inorganic Type — A material with low organic fiber content to reduce smoke and odor emission.

Asbestos Laminating Paper — This product contains natural fiber for additional strength. It is specially formulated for use with galvanized steel pipe.

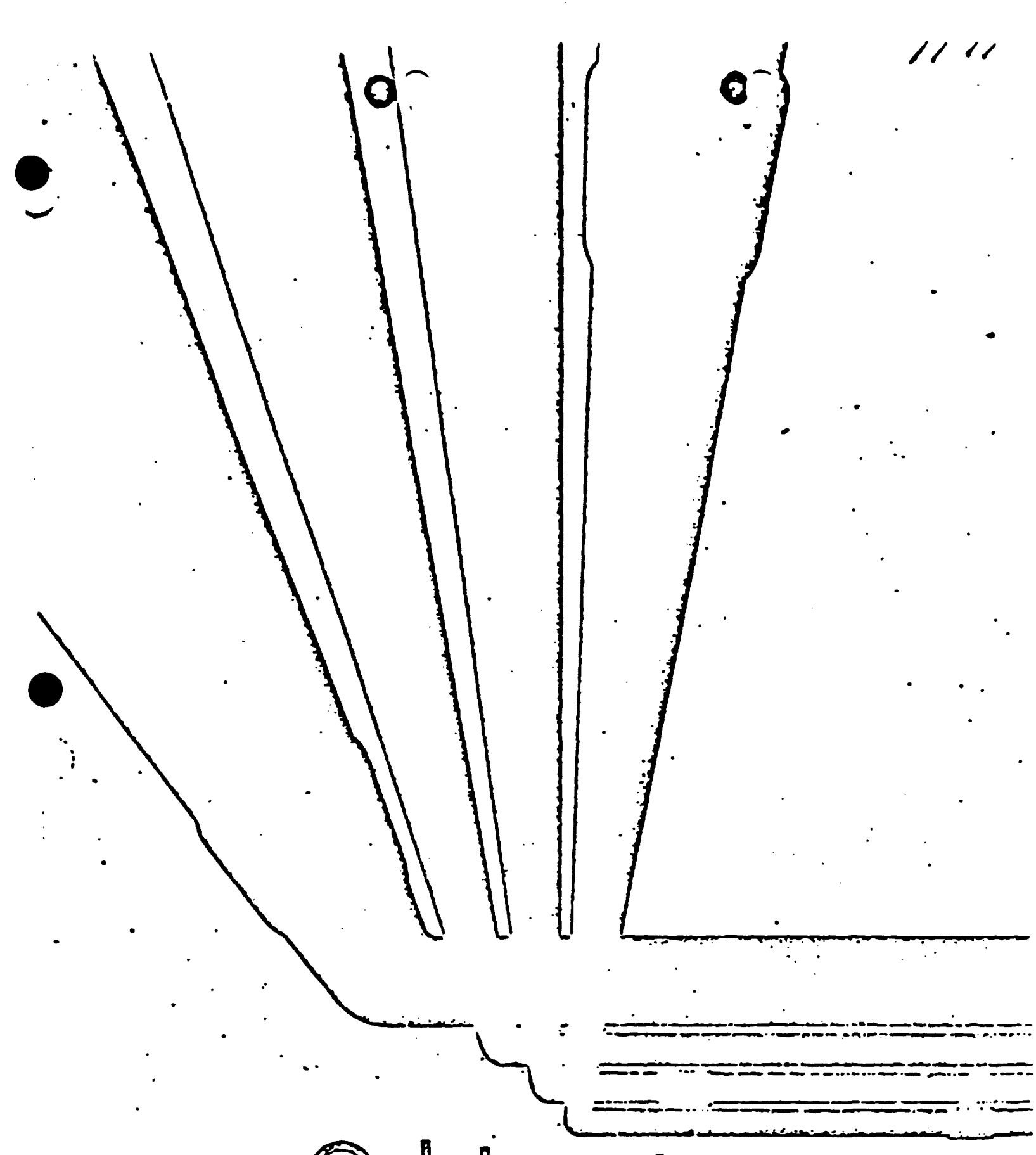
Asbestos Muffler Paper — This asbestos paper is indented or waffled, to provide greater overall caliper and flexibility. It is used widely in the automotive industry.

Filter Felt — Used as a filtering medium in automotive lubricating oil filters.

Flooring Felt — Saturated with high quality asphalt and painted one side with a primer, this product is used by the flooring manufacturers as a base layer for enamel print floor covering.

Celotex Asbestos Gasket Materials — Celotex manufactures gasket papers that are especially formulated to meet customer specifications. Typically these materials are made of asbestos fibers uniformly coated with synthetic rubber latices selected for specific requirements. They are resilient, non-corrosive, fungus resistant and dimensionally stable.

FOR ADDITIONAL INFORMATION CONTACT YOUR NEAREST CELOTEX REGIONAL OFFICE.


Celotemp®
1500 Insulation
by Glatex

Celotemp 1500

Asbestos Free High Temperature Pipe and Block Insulation

CELOTEMP 1500 insulation is the latest development in industrial insulations from Celotex. It combines the chemical and moisture resistance properties so important to industrial users, with impact resistance superior to any of its predecessors, to provide an ideal insulation for high temperature piping and equipment.

CELOTEMP 1500 insulation contains no asbestos, so problems with OSHA regulations regarding the use of asbestos are eliminated. CELOTEMP 1500 insulation is made of expanded perlite, with millions of individual vitrified air cells bonded together by special binders and reinforcing which resist moisture penetration and increase impact resistance. The increased resistance to crumbling and reduced breakage facilitates installation and yields a longer lasting job.

CELOTEMP 1500 possesses these properties which make it a unique insulating material:

- Will not appreciably lower the autoignition temperature of ethylene oxide-air mixtures.
- Can withstand face temperatures up to 1500°F., and maintain linear shrinkage of less than 2%.
- Non wicking – will not absorb large quantities of flammable liquids – absorbs less than 7% as much water (by weight) as calcium silicate high temperature insulation. Helps to protect insulated equipment from external fires.
- Contains no lime, and thus will not contribute to the corrosion of aluminum jacketing.
- Contains less than 150 ppm chloride, does not contribute to corrosion of austenitic stainless steel.
- Weighs approximately 20% less than most calcium silicate high temperature insulations.

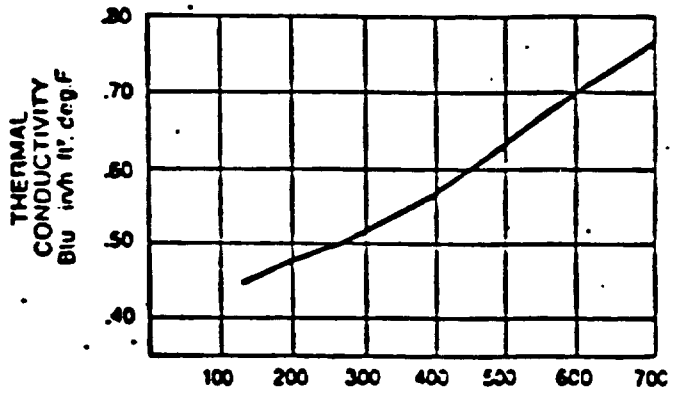
All of these properties make CELOTEMP 1500 well suited to a variety of applications in process piping, refractory use and in chemical plants, refineries and power generating installations.

CELOTEMP PREMOLDED ELBOW INSULATION

To insure total insulation throughout the system, the use of CELOTEMP premolded elbows is recommended. Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

Physical Properties*

Temperature limits	Maximum 1500°F Continuous 1500°F Cyclic 1500°F
Density (dry)	10-13 lbs/cu. ft.
Compressive strength	5% deformation 90 psi.
Linear shrinkage (percent)	
1200°F. for 24 hours	.70
1500°F. for 24 hours	1.60
Water absorption (percent)	
By volume in 90% relative humidity 4 weeks	1.30
By volume, immersed 24 hours	2.7
Acid resistance (after 24 hours immersion)	
25% sulfuric or hydrochloric acid	No effect



A.S.T.M. Specification C-610-67

*All tests conducted according to standard ASTM test methods

CELOTEMP elbows are available in many iron pipe and copper tubing sizes in thicknesses to match adjacent insulation. Iron pipe sizes range from ½" to 20" and thicknesses from 1" to 4". Elbow fittings are also available for steam tracing.

Standard Sizes

Copper tubing – ⅜", ⅝", 1⅛", 1⅜", 2⅛", 3⅛" O.D. half sections
Iron pipe – ⅛" through 24" IPS, half sections
Thickness – 1" through 3½", single layer
Segmental – 12½" wide curved sections through 60" O.D.
Block insulation:
Standard widths – 6", 12", and 24"
Standard length – 36"
Standard thickness – 1½" through 5", in ½" increments.

Asbestos-Free MW-One Insulating Cement

MW-One is a combination insulating and finishing cement for temperatures up to 1000 F. Celotex mineral wool pellets and other ingredients including rust inhibitor, are combined to form this monolithic all-purpose, fast-setting finish cement that insulates as well as protects.

MW-One is used for valves, fittings, tanks, ovens, hot air ducts. It can be applied directly over any insulation or it can be used as a finishing cement for MW-50. Furnished in multi-wall 50-lb. paper bags. Thermal conductivity. At 200°F. — .86.

Asbestos-Free MW-50 Insulating Cement

MW-50 Cement is a complete insulating material in itself. Special MW-50 nodular mineral fibers are combined with bonding materials and a rust inhibitor to produce a mixture with excellent physical and thermal properties.

MW-50 Cement is an excellent monolithic insulation for valves, fittings, expansion joints, heaters, exchangers, access doors, water tube boiler walls, tanks, stills, drumheads and other heated equipment operating at temperatures up to 1800°F. It is particularly recommended for irregular surfaces. Furnished in multi-wall 50-lb. paper bags. Thermal conductivity: At 200°F. — .54

Fibrous Adhesive (Bonding)†

Fibrous Adhesive is a fibrous plastic cement of thin troweling or brushing consistency composed of asbestos fibers, silicate of soda and filler materials. It is designed for laying up insulating blocks and making fittings. It makes a very strong heat-proof bond that is unaffected by temperatures up to 800°F. Furnished in 1-gal. cans, 5-gal pails and 54-gal. drums.

Thermotex-B†

Thermotex-B is a breathing-type weather-resistant coating for temperatures up to 200°F. It is a combination of asbestos fibers, emulsified asphalt and mineral stabilizers. Forms a cold plastic water-resistant coating which is applied by trowel.

Thermotex-B is recommended as a durable coating for insulation on hot equipment, ducts, vessels, breechings, tanks, towers, heat exchangers and fittings that are subjected to weather conditions. It is especially suited for oil and chemical plant use because it resists acid and alkaline conditions and can be installed over insulation that is not completely dry. After application over moist insulation, will not drip asphalt in the presence of fire and is highly resistant to combustion. Furnished in approximately 50 lb. rolls 36" wide by 36' long, containing 100 sq. ft.

Insulation Seal†

Insulation Seal is a ready mixed asbestos fibrated bituminous mastic. It is especially compounded for cold application over most types of insulating materials. It protects the insulation against damage and loss of efficiency by the penetration of water and water vapor. Made in spray or trowel consistency.

Insulation Seal can be used on pipes, curved and flat surfaces of all kinds. It will hold its bond on horizontal, vertical, sloped or inverted surfaces. Designed for application over insulation such as asbestos cement, rock wool base cements, cellular glass, fiberglass, mineral wool blankets. It is specially recommended for systems operating at temperatures below dew point, dual temperature systems (200°F. maximum surface temperature) and systems subject to long shut-down periods. Furnished in 1-gal. cans, 5-gal pails, 54-gal drums.

No. 51 Emulsion

No. 51 Emulsion is composed of asphalt, water and bentonite clay, with troweling consistency. May be used as a prime and bond coat for insulation and cold storage vault and other low temperature insulated construction, as well as for temperatures up to 200°F.

Mixes well with asbestos fiber and sand to make "on-the-job" finished coats. Furnished in 5-gal. pails and 54-gal drums.

Fireclad Jacketing†

Fireclad Jacketing is a durable, weather-resistant jacketing specifically designed for the protection of outdoor pipe lines where the danger of fire must be minimized. Celotex Fireclad consists of a tough, substantial sheet of asphalt-saturated asbestos felt, over which is cemented on one side an unsaturated asbestos sheet. The complete sheet is reinforced with a fabric of tough, flexible glass threads. Fireclad Jacketing

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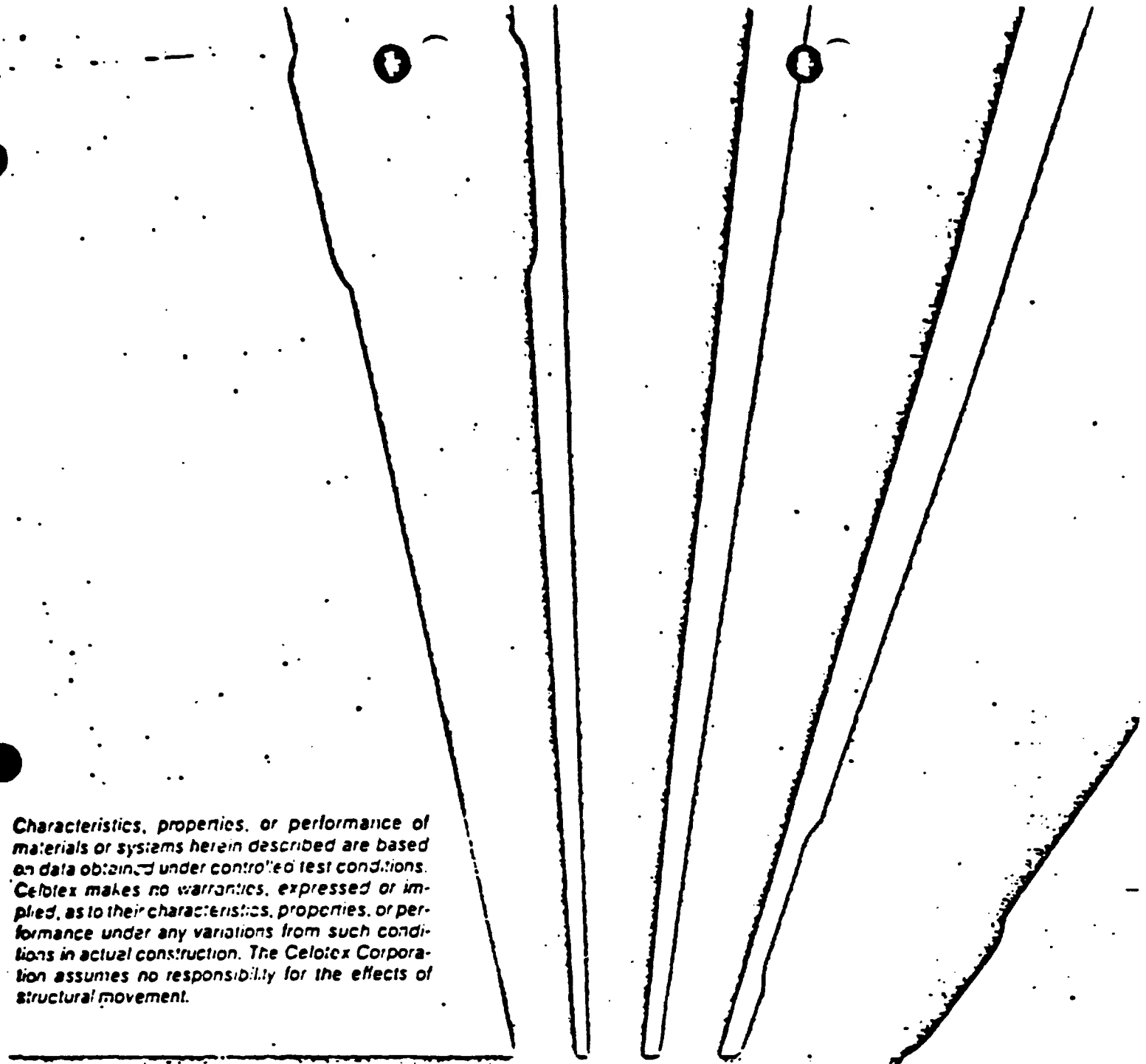

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Celotex®

INDUSTRIAL PRODUCTS
Industrial Sales Department (813) 871-4575

THE CELOTEX CORPORATION
TAMPA, FLORIDA 33622

a Jim Walter company

CELOTEMP 1500

Asbestos Free High Temperature Pipe & Block Insulation

1977

CELOTEMP 1500 is a molded rigid high temperature insulation, made of expanded perlite with millions of individual vitrified air cells bonded together by special binders and reinforcing fibers. This patented process combines the chemical and moisture resistance properties so important to industrial users.

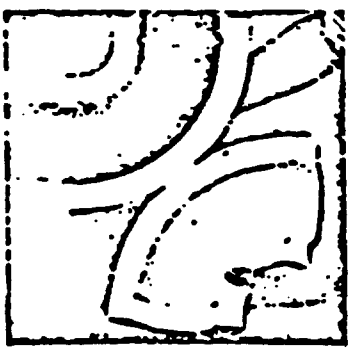
CELOTEMP 1500 is a superior, lightweight high temperature pipe and block insulation recommended for use in power generating and process industries on indoor and outdoor pipes, vessels and equipment operating continuous or cyclical at temperatures to 1500°F.

- CELOTEMP 1500 possesses these properties which make it a unique insulating material:
  - *Will not appreciably lower the auto ignition temperature of ethylene oxide-air mixtures.
  - *Can withstand face temperatures up to 1500°F., and maintain linear shrinkage of less than 2%.
  - *Non wicking — will not absorb large quantities of water — absorbs less than 7% as much water (by weight) as calcium silicate high temperature insulation.
  - *Helps to protect insulated equipment from external fires.
  - *Contains no lime, and thus will not contribute to the corrosion of aluminum.
  - *Contains less than 150 ppm chloride, does not contribute to stress corrosion of austenitic stainless steel.
  - *Weighs approximately 20% less than most calcium silicate high temperature insulations.
- All of these properties make CELOTEMP 1500 well suited to a variety of applications in process piping, refractory use and in chemical plants, refineries and power generating installations.

CELOTEMP PREMOLDED ELBOW INSULATION

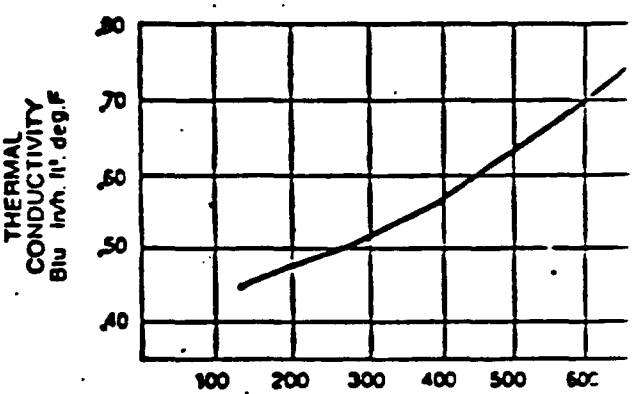
To insure total insulation throughout the system, the use of CELOTEMP *premolded elbows is recommended.* Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

CELOTEMP elbows are available in many iron pipe and copper tubing sizes in thicknesses to match adjacent insulation. Iron pipe sizes range from ½" to 20" and thicknesses from 1" to 4". Elbow fittings are also available for steam tracing purposes.



Physical Properties*

Temperature limits	Maximum 150
	Continuous 150
	Cyclic 150
Density (dry)	10-13 lbs.
Compressive strength	5% deformation 9
Linear shrinkage (percent)	
1200°F. for 24 hours	
1500°F. for 24 hours	1
Water absorption (percent)	
By volume @ 90% relative humidity 4 weeks	1
By volume, immersed 24 hours	
Acid resistance (after 24 hours immersion)	
25% sulfuric or hydrochloric acid	No e



A.S.T.M. Specification C-610

*All tests conducted according to standard ASTM test method

Standard Sizes

Pipe insulation — ½" through 24" IPS, half sections
Thickness — 1" through 3", single layer
Segmental — 12¾" wide curved sections through 60° C
Block insulation:
Widths — 6", 12", and 24"
Length — 36"
Thickness — 1½" through 4", in ½" increments.

Cements and Adhesives

MW-One Insulating and Finishing Cement Asbestos-Free

MW-One is a combination insulating and finishing cement for temperatures up to 1000 F. Celotex mineral wool pellets and other ingredients, including rust inhibitor, are combined to form this monolithic all-purpose, fast-setting finish cement that insulates as well as protects.

MW-One is used for valves, fittings, tanks, ovens, hot air ducts. It can be applied directly over any insulation or it can be used as a finishing cement for MW-50. Furnished in multi-wall 50-lb paper bags. Thermal conductivity At 200°F. — .86.

MW-50 Insulating Cement Asbestos-Free

MW-50 Cement is a complete insulating material in itself. Special MW-50 nodular mineral fibers are combined with bonding materials and a rust inhibitor to produce a mixture with excellent physical and thermal properties.

MW-50 Cement is an excellent monolithic insulation for valves, fittings expansion joints, heaters, exchangers, access doors, water tube boiler walls, tanks, stills, drumheads and other heated equipment operating at temperatures up to 1800°F. It is particularly recommended for irregular surfaces. Furnished in multi-wall 50-lb paper bags. Thermal conductivity: At 200°F. — .54

Fibrous Adhesive (Bonding)†

Fibrous Adhesive is a fibrous plastic cement of thin troweling or brushing consistency composed of asbestos fibers, silicate of soda and filler materials. It is designed for laying up insulating blocks and making fittings. It makes a very strong heat-proof bond that is unaffected by temperatures up to 800°F. Furnished in 1-gal. cans, 5-gal pails and 54-gal. drums.

Protective Coatings

Thermotex-B†

Thermotex-B is a breathing-type weather-resistant coating for temperatures up to 200 F. It is a combination of asbestos fibers, emulsified asphalt and mineral stabilizers. Forms a cold plastic water-resistant coating which is applied by trowel.

Thermotex-B is recommended as a durable coating for insulation on hot equipment, ducts, vessels, breechings, tanks, towers, heat exchangers and fittings that are subjected to weather conditions. It is especially suited for oil and chemical plant use because it resists acid and alkaline conditions and can be installed over insulation that is not completely dry. After application over moist insulation, Thermotex-B allows the trapped water vapor to escape while remaining impervious to surface water. Furnished in 5 gal. pails and 52 gal. drums.

Insulation Seal†

Insulation Seal is a ready mixed asbestos fibrated bituminous mastic. It is especially compounded for cold application over most types of insulating materials. It protects the insulation against damage and loss of efficiency by the penetration of water and water vapor.

Insulation Seal can be used on pipes, curved and flat surfaces of all kinds. It will hold its bond on horizontal, vertical, sloped or inverted surfaces. Designed for application over insulation such as insulating cements, cellular glass, fiberglass, mineral wool blankets. It is specially recommended for systems operating at temperatures below dew point, dual temperature systems (200°F. maximum surface temperature), and systems subject to long shut-down periods. Furnished in 1-gal. cans, 5-gal. pails, 54-gal. drums.

Mineral Fiber Boards, Blocks and Blankets

IMF Board, Blocks and Blanket insulation are composed of high temperature mineral fibers bonded together with specially-formulated binders. These products offer a variety of insulating uses especially for direct application or refractory back-up insulation in petroleum and process units, power generation equipment, ovens, furnaces, kilns, boilers or related equipment. These IMF products can be used applications with temperature limits from 1050°F. to 1900°F. depending on the type of IMF product specified.

Insulation Jacketing

Fireclad Jacketing†

Fireclad Jacketing is a durable, weather-resistant jacketing specifically designed for the protection of outdoor pipe lines where the danger of fire must be minimized. Celotex Fireclad consists of a tough, substantial sheet of asphalt-saturated asbestos felt, over which is cemented on one side an unsaturated asbestos sheet. The complete sheet is reinforced with a fabric of tough, flexible glass threads. Fireclad Jacketing will not drip asphalt in the presence of fire and is highly resistant to combustion. Furnished in approximately 50 lb. rolls 36" wide by 36' long, containing 108 sq. ft.

†WARNING

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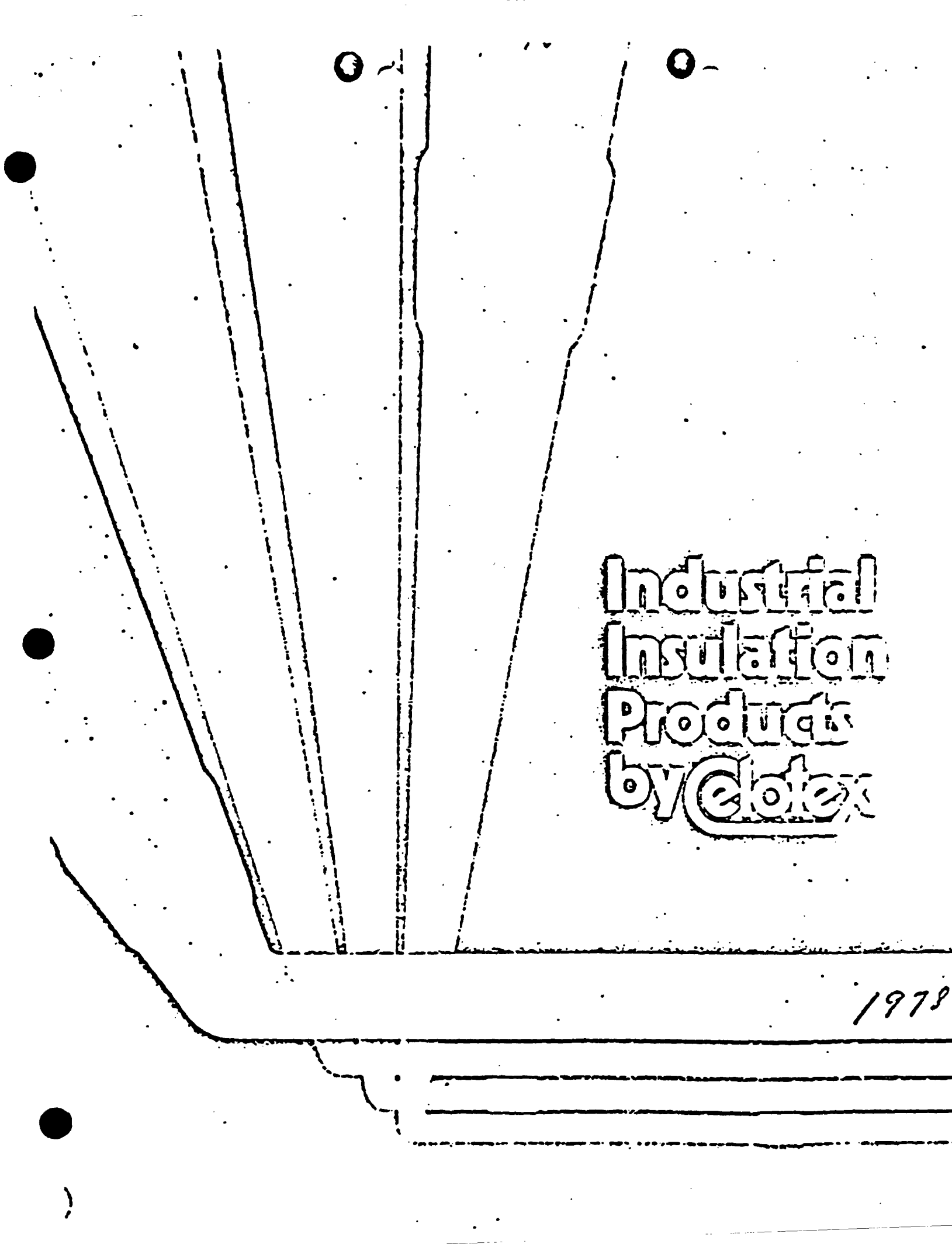

Industrial
Insulation
Products
by Celotex
1978

Celotemp® 1500
High Temperature Pipe and Block Insulation

CELOTEMP 1500 is a molded rigid high temperature insulation made of expanded perlite, with millions of individual vitrified air cells bonded together by special binders and reinforcing fibers. This patented process combines the chemical and moisture resistance properties so important to industrial users.

CELOTEMP 1500 is a superior, lightweight high temperature pipe and block insulation recommended for use in power generating and process industries on indoor and outdoor pipes, vessels and equipment operating continuous or cyclical at temperatures to 1500°F.

CELOTEMP 1500 possesses these properties which make it a unique insulating material:

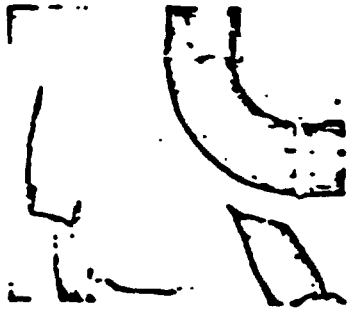
- Will not appreciably lower the auto ignition temperature of ethylene oxide-air mixtures.
- Can withstand face temperatures up to 1500°F., and maintain linear shrinkage of less than 2%.
- Non wicking—will not absorb large quantities of water—absorbs less than 7% as much water (by weight) as calcium silicate high temperature insulation
- Helps to protect insulated equipment from external fires.
- Contains no lime, and thus will not contribute to the corrosion of aluminum
- Contains less than 150 ppm chloride, does not contribute to stress corrosion of austenitic stainless steel.
- Weighs approximately 20% less than most calcium silicate high temperature insulations.

All of these properties make CELOTEMP 1500 well suited to a variety of applications in process piping, refractory use and in chemical plants, refineries and power generating installations.

CELOTEMP PREMOLDED ELBOW INSULATION

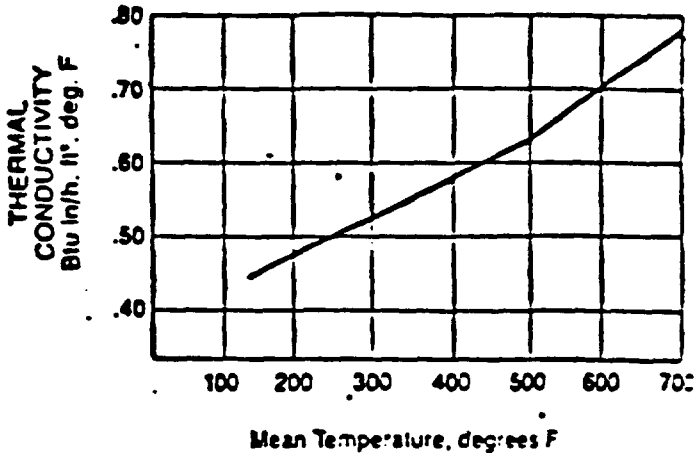
To insure total insulation throughout the system, the use of CELOTEMP premolded elbows is recommended. Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

CELOTEMP elbows are available in many iron pipe and copper tubing sizes in thicknesses to match adjacent insulation. Iron pipe sizes range from ½" to 20" and thicknesses from 1" to 4". Elbow fittings are also available for steam tracing purposes.



Physical Properties*

Temperature limits	Maximum 1500°F
	Continuous 1500°F
	Cyclic 1500°F
Density (dry)	10-13 lbs./cu. ft.
Compressive strength	5% deformation 90 psi
Linear shrinkage (percent)	
1200°F. for 24 hours	.6%
1500°F. for 24 hours	1.6%
Water absorption (percent)	
By volume @ 90% relative humidity 4 weeks	1.3%
By volume, immersed 24 hours	2.7
Acid resistance (after 24 hours immersion)	
25% sulfuric or hydrochloric acid	No effect



A.S.T.M. Specification C-610-67

**All tests conducted according to standard ASTM test methods.*

Standard Sizes

Pipe insulation—½" through 24" IPS, half sections
Thickness—1" through 3", single layer
Segmental—12½" wide curved sections through 60" O.D.
Block insulation:
Widths—6", 12", and 24"
Length—36"
Thickness—1½" through 4", in ½" increments.

Mineral Fiber Insulation

IMF products are composed of high temperature mineral fiber bonded together with specially formulated binders.

IMF-1900 Block provides a temperature limit of 1900°F. The product is available in thicknesses ranging from 1" to 4" in ½" increments; width: 6", 12" and 24"; length: 18" and 36".

IMF-1200 Block is recommended for use [illegible]. This non-hygroscopic product is produced in 12" x 36" and 24" x 36" sizes in 1", 1½" and 2" thicknesses.

IMF-1300 Blanket is bonded together with a very low content of binder producing a flexible resilient insulation for use over practically any surface at temperatures up to 1400°F. Standard sizes:

Thickness: 1" to 4" in ½" increments with single layer construction. Faced styles can be supplied with multiple layer construction to achieve greater thickness.
Width: 24"
Length: 48" and 96"

IMF-1050 Board is available in 6, 8 or 10 lb. density for use on heated equipment operated at temperatures up to 1050°F. Available in 24" x 48" sizes with thicknesses from 1" to 4" in ½" increments.

Cements and Adhesives

MW-One Insulating and Finishing Cement Asbestos-Free

MW-One is a combination insulating and finishing cement for temperatures up to 1000°F. Celotex mineral wool pellets and other ingredients, including rust inhibitor, are combined to form this monolithic, all-purpose, fast-setting finish cement that insulates as well as protects.

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Insulation Seal†

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Insulation Jacketing

Fireclad Jacketing†

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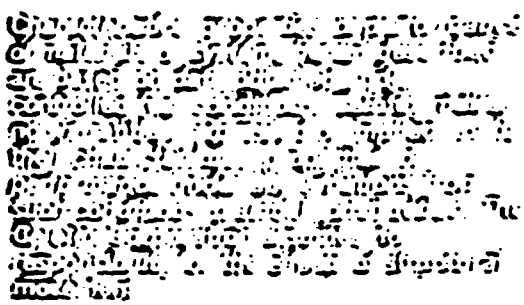
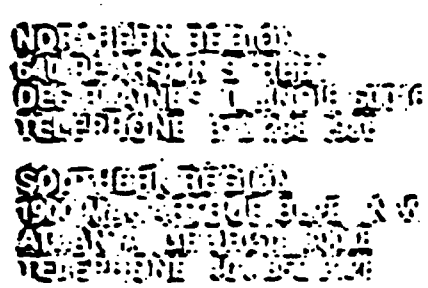
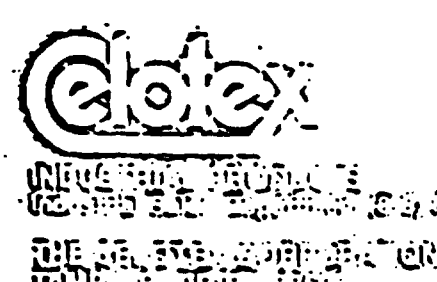
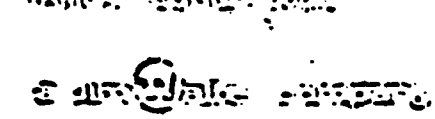
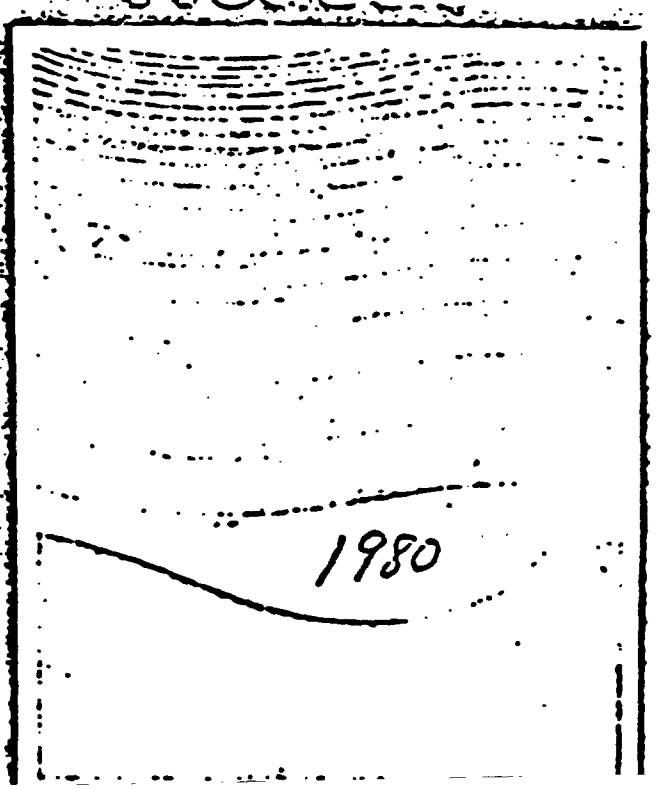








Celotex Industrial Paper and Felt Products



Commercial Asbestos* Paper and Rollboard

DESCRIPTION: Asbestos Paper and Rollboard are composed of Canadian asbestos fiber combined with a small quantity of extremely strong binding material. A specially-equipped paper-making machine turns the blended components into rolls. The material is thoroughly dried and finally calendered to a smooth finish. Asbestos Paper and Rollboard are strong flexible fire-resistant products suitable for varied applications throughout industry.

Asbestos Paper and Rollboard are of one type and vary only in thickness and width of rolls.

Asbestos Paper Tape is available in 2" and 3" wide rolls — each 84 feet long. The Tape is made from standard 12-lb. stock.

APPLICATIONS: Asbestos Paper and Rollboard are satisfactory for a great variety of purposes. The 6 and 8-lb. papers may be used in the manufacture of various insulations. The 10 and 12-lb. papers have been used for wrapping hot air furnace pipes.

SIZES: Asbestos Paper and Rollboard are furnished in standard widths of 18", 24", 36" and 37½". Special sizes can be made to order. Standard weights and thicknesses of sheets are:

TYPICAL CHARACTERISTICS COMMERCIAL ASBESTOS ROLLBOARD

	3/32"	1/8"
Weight, Pounds	48-52	57-67
Thickness Inches Nominal	.094	.123
Tensile Strength, Dry Pounds Per Inch, With Grain Minimum	35	35
Mullen Strength,** Lbs. per inch	32	32
Moisture Per Cent, Maximum	3	5

TYPICAL CHARACTERISTICS COMMERCIAL ASBESTOS PAPER

	6 lb.	8 lb.	10 lb.	12 lb.	14 lb.	16 lb.	1/16"††
Weight, pounds per 100 sq. ft.	5.5-6.5	7.5-8.5	9.3-10.7	11-12.6	13-15	15-17	30-34
Thickness Inches Nom.	.015	.018	.022	.025	.028	.032	.060-.064
Tensile Strength Dry Pounds/in With Grain Min.	14	14	14	15	16	16	20
Mullen Strength,** Pounds/in	10	11	12	12	14	14	20
Moisture, Per Cent	9	9	9	9	9	9	9

Asbestos Insulating* Paper Specialties

CORRUGATED ASBESTOS PAPER

DESCRIPTION: Corrugated Asbestos Paper consists of a sheet of asbestos paper which has been corrugated [illegible] cemented to a flat backing sheet of like material. The two sheets are joined by a suitable adhesive.

Corrugated Asbestos Paper is a very light and flexible form of insulation, adaptable for wrapping around curved surfaces.

SIZES: Corrugated Asbestos Paper is furnished in coarse corrugations (¼" thick per ply) in 36" to 37" wide rolls. It can be ordered in 250 sq. ft. or 500 sq. ft. rolls.

APPLICATIONS: Corrugated Asbestos Paper can be used wherever a light and flexible, yet efficient, insulating material is required.

CAREYFOIL

DESCRIPTION: Careyfoil is made from ¼" Corrugated Asbestos Paper with a layer of aluminum foil adhered to the flat side only. This method of construction adds materially to its insulating value.

Underwriters Classified. Material available upon request.

SIZES: Careyfoil is furnished in 36" and 37" wide rolls, each containing 250 sq. ft. of material.

APPLICATIONS: Careyfoil is used in the construction of furnaces for residential and commercial use.

FOIL-FACED ASBESTOS PAPER

DESCRIPTION: Foil-Faced Asbestos Paper consists of Commercial Asbestos Paper with aluminum foil adhered to one or both sides. One side foil paper is furnished in roll form, two side material is usually provided in sheets.

SIZES: Foil-Faced Asbestos Paper is furnished in 36" or 37" wide rolls. It can be ordered in 500 or 1,000 sq. ft. rolls.

APPLICATIONS: Foil-Faced Asbestos Paper is used as insulation and a lighting reflector for lighting fixtures, as insulation for moderate temperature applications. It is also an insulator for pipes and ducts.

UNDERWRITERS LABORATORIES INC.®
CLASSIFIED
SHEATHING MATERIAL
FIRE HAZARD CLASSIFICATION

Flame Spread	10

Asbestos* Millboard

DESCRIPTION: Asbestos Millboard is made from Canadian asbestos fiber pulp mixed with binding materials and formed in sheets. Commercial Millboard is produced in two grades. No. 1 Hard and No. 7 Medium. No. 1 Grade withstands temperatures up to 1000°F. and No. 7 Grade withstands temperatures up to 800°F. These two grades satisfy the vast majority of requirements. Special grades can be developed by Celotex laboratories. Asbestos Millboard with pin-point (knurled) finish can also be supplied.

SIZES: Asbestos Millboard is furnished in 42" x 48" sheets in the following thicknesses.

TYPICAL CHARACTERISTICS
COMMERCIAL ASBESTOS MILLBOARD

Thickness (Inches)	Pounds*** Per Sheet	Ounces*** Per Sq. Ft.
1/16	3.9	4.5
5/64	4.9	5.6
3/32	5.9	6.7
1/8	7.9	9.0
5/32	9.4	10.7
3/16	11.8	13.5
1/4	15.8	18.1
5/16	19.7	22.5
3/8	23.6	27.0
1/2	31.5	36.0
5/8 †††	37.6	43.0
3/4 †††	45.2	51.7
1 †††	60.2	68.8

***Typical weights.
†††Available in laminated form on a special order basis only.

APPLICATIONS: Asbestos Millboard is used extensively in the electric heating field and glass industries.

Characteristics, properties, or performance of materials or systems herein described are based on data obtained under controlled test conditions. Celotex makes no warranties, express or implied, as to their characteristics, properties, or performance under any variations from such conditions in actual construction. The Celotex Corporation assumes no responsibility for the effects of structural movement.

***WARNING**

These products contain asbestos fiber. The Occupational Safety and Health Administration (OSHA), an agency of the United States Government, believes that repeated inhalation of asbestos fiber is

Specialty Asbestos* and Organic Papers

DESCRIPTION: Celotex produces a number of Specialty Asbestos and Organic Papers for a broad range of applications in varied industries. Briefly these materials include:

Asbestos Resin Saturating Paper — A phenolic resin saturating type paper designed to be impregnated with thermosetting resin. Saturated material is usually wrapped or formed then heated to cure the resin and form a hard, heat-resistant component.

Asbestos Asphalt Saturating Paper — Designed for use as a base for roofing and dampproofing membrane by saturation with roofing grades of asphalt and tar pitch.

Asbestos Paper, Inorganic Type — A material with low organic fiber content to reduce smoke and odor emission.

Asbestos Laminating Paper — This product contains natural fiber for additional strength. It is specially formulated for use with galvanized steel pipe.

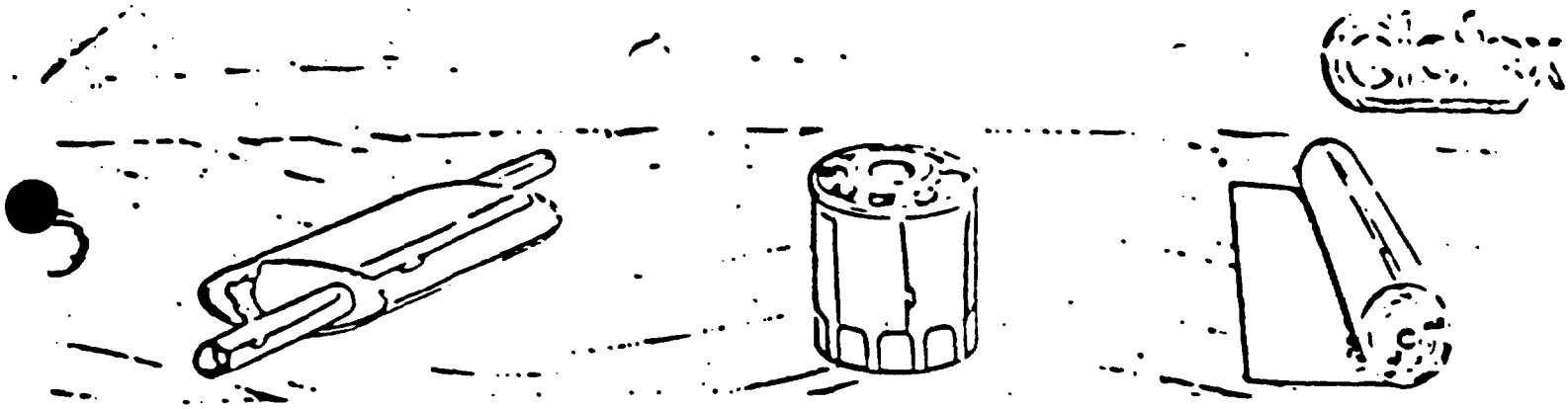
Asbestos Muffler Paper — This asbestos paper is indented or waffled, to provide greater overall caliper and flexibility. It is used widely in the automotive industry.

Filter Felt — Used as a filtering medium in automotive lubricating oil filters.

Flooring Felt — Saturated with high quality asphalt and painted one side with a primer, this product is used by the flooring manufacturers as a base layer for enamel print floor covering.

Celotex Asbestos Gasket Materials — Celotex manufactures gasket papers that are especially formulated to meet customer specifications. Typically these materials are made of asbestos fibers uniformly coated with synthetic rubber latices selected for specific requirements. They are resilient, non-corrosive, fungus resistant and dimensionally stable.

FOR ADDITIONAL INFORMATION
CONTACT YOUR NEAREST



Specialty Asbestos and Organic Papers

DESCRIPTION: Celotex produces a number of Specialty Asbestos and Organic Papers for a broad range of applications in varied industries. Briefly these materials include:

Asbestos Resin Saturating Paper — A phenolic resin saturating type paper designed to be impregnated with thermo-setting resin. Saturated material is usually wrapped or rolled, then heated to cure the resin and form a hard, heat-resistant component.

Asbestos Asphalt Saturating Paper — Designed for use as a base for roofing and oampproofing membrane by saturating with roofing grades of asphalt and tar pitch.

Asbestos Pipeline Wrapping Paper — Reinforced with continuous filament glass fiber strands for high sheet strength. This material has many industrial uses in addition to its principle application as a corrosion-preventing pipeline wrap.

Asbestos Paper, Inorganic Type — A material with low organic fiber content to reduce smoke and odor emission.

Asbestos Laminating Paper — This product contains natural fiber for additional strength. It is specially formulated for use with galvanized steel pipe.

Asbestos Muffler Paper — This asbestos paper is indented, or waffled, to provide greater overall caliper and flexibility. It is used widely in the automotive industry.

Non-Flammable Protective Paper — Thin, non-flammable asbestos paper for use as a flame retardant in decorative wall paneling.

Asbestos Flooring Backer Sheet — Latex bound asbestos paper of the beater addition type which contributes resiliance, dimensional stability and durability to composite floor covering materials.

Filter Felt — Used as a filtering medium in automotive lubricating oil filters.

Organic Flooring Felt — Saturated with high quality asphalt and painted one side with a primer, this product is used by the flooring manufacturers as a base layer for enamel print flooring.

Celotex Asbestos Gasket Materials — Celotex manufactures a variety of gasket papers that are especially formulated to meet demanding customer specifications. Typically these materials are made of asbestos fibers uniformly coated with synthetic rubber latices selected for specific requirements. They are resilient, non-corrosive, fungus resistant and dimensionally stable.

CAUTION: Celotex specialty products contain asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm.

Cements and Adhesives

MW-One Insulating and Finishing Cement Asbestos-Free

MW-One is a combination insulating and finishing cement for temperatures up to 1000°F. Celotex mineral wool pellets and other ingredients, including rust inhibitor, are combined to form this monolithic, all-purpose, fast-setting finish cement that insulates as well as protects.

MW-One is used for valves, fittings, tanks, ovens, hot air ducts. It can be applied directly over any insulation or it can be used as a finishing cement for MW-50. Furnished in multi-wall 50-lb paper bags. Thermal conductivity. At 200°F. — .86.

MW-50 Insulating Cement Asbestos-Free

MW-50 Cement is a complete insulating material in itself. Special MW-50 nodular mineral fibers are combined with bonding materials and a rust inhibitor to produce a mixture with excellent physical and thermal properties.

MW-50 Cement is an excellent monolithic insulation for valves, fittings, expansion joints, heaters, exchangers, access doors, water tube boiler walls, tanks, stills, drumheads and other heated equipment operating at temperatures up to 1800°F. It is particularly recommended for irregular surfaces. Furnished in multi-wall 50-lb paper bags. Thermal conductivity: At 200°F. — .54

Fibrous Adhesive (Bonding)†

Fibrous Adhesive is a fibrous plastic cement of thin troweling or brushing consistency composed of asbestos fibers, silicate of soda and filler materials. It is designed for laying up insulating blocks and making fittings. It makes a very strong heat-proof bond that is unaffected by temperatures up to 800°F. Furnished in 1-gal. cans, 5-gal pails and 54-gal. drums.

Protective Coatings

Thermotex-B†

Thermotex-B is a breathing-type weather-resistant coating for temperatures up to 200°F. It is a combination of asbestos fibers, emulsified asphalt and mineral stabilizers. Forms a cold plastic water-resistant coating which is applied by trowel.

Thermotex-B is recommended as a durable coating for insulation on hot equipment, ducts, vessels, breechings, tanks, towers, heat exchangers and fittings that are subjected to weather conditions. It is especially suited for oil and chemical plant use because it resists acid and alkaline conditions and can be installed over insulation that is not completely dry. After application over moist insulation, Thermotex-B allows the trapped water vapor to escape while remaining impervious to surface water. Furnished in 5 gal. pails and 52 gal. drums.

Insulation Seal†

Insulation Seal is a ready mixed asbestos fibrated bituminous mastic. It is especially compounded for cold application over most types of insulating materials. It protects the insulation against damage and loss of efficiency by the penetration of water and water vapor.

Insulation Seal can be used on pipes, curved and flat surfaces of all kinds. It will hold its bond on horizontal, vertical, sloped or inverted surfaces. Designed for application over insulation such as insulating cements, cellular glass, fiberglass, mineral wool blankets. It is specially recommended for systems operating at temperatures below dew point, dual temperature systems (200°F. maximum surface temperature), and systems subject to long shut-down periods. Furnished in 1-gal. cans, 5-gal. pails, 54-gal. drums.

Mineral Fiber Boards, Blocks and Blankets

IMF Board, Blocks and Blanket insulation are composed of high temperature mineral fibers bonded together with specially-formulated binders. These products offer a variety of insulating uses especially for direct application or refractory back-up insulation in petroleum and process units, power generation equipment, ovens, furnaces, kilns, boilers or related equipment. These IMF products can be used applications with temperature limits from 1050°F. to 1900°F. depending on the type of IMF product specified.

Insulation Jacketing

Fireclad Jacketing†

Fireclad Jacketing is a durable, weather-resistant jacketing specifically designed for the protection of outdoor pipe lines where the danger of fire must be minimized. Celotex Fireclad consists of a tough, substantial sheet of asphalt-saturated asbestos felt, over which is cemented on one side an unsaturated asbestos sheet. The complete sheet is reinforced with a fabric of tough, flexible glass threads. Fireclad Jacketing will not drip asphalt in the presence of fire and is highly resistant to combustion. Furnished in approximately 50 lb rolls 36" wide by 36' long, containing 108 sq. ft.

†WARNING

This product contains asbestos fiber. The Occupational Safety and Health Administration (OSHA), an agency of the United States Government, believes that repeated inhalation of asbestos fiber is a health hazard and may cause various diseases including cancer and asbestosis.

Characteristics, properties, or performance of materials or systems herein described are based on data obtained under controlled test conditions. Celotex makes no warranties, expressed or implied, as to their characteristics, properties, or performance under any variations from such conditions in actual construction. The Celotex Corporation assumes no responsibility for the effects of structural movement.

AFFIDAVIT OF

STANLEY PETERS

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, STANLEY PETERS, being duly sworn and cautioned, state that:

1. I am employed by The Celotex Corporation as Manager of the Billing Department.

2. The Billing Department maintains a computerized list of sales invoices of all building and insulation products, dating back to September 1, 1974.

3. The sales invoices are not separated into "Asbestos Containing" and "Asbestos Free" products.

4. In order to retrieve certain sales invoices, our Billing Department must have the exact name of the purchaser, his address and the year of the sale.

5. It is impossible to locate sales invoices for products shipped to a particular location. (except by an individual manual search) The invoices are listed only by the company that made the purchase.

6. Approximately twenty thousand (20,000) sales invoices are generated during an average month within a given year.

7. In order to determine the invoices applicable for a requested period, one must manually research the computer generated customer list for each individual month. Following this, a manual search of the plant invoices series must be made in order to retrieve the actual sales invoice.

8. The search is a time consuming task. It takes approximate twenty (20) hours to research one company for one year.

FURTHER AFFIANT SAYETH NAUGHT.

Stanley Peters

Stanley Peters, Manager
Billing Department
The Celotex Corporation

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

Sworn and subscribed in my presence this 25th day of August 1982.

Virginia Dee

Notary Public

AFFIDAVIT
OF
KEN BROWN

STATE OF OHIO

COUNTY OF HAMILTON

I, KEN BROWN, being duly sworn and cautioned, state that:

1. I am employed by The Celotex Corporation as Comptroller of the Lockland, Ohio plant. As such, I have the custody and control of certain invoice records located in the basement of our Lockland, Ohio plant.

2. The records begin in late 1967 and continue to the date when Panacon Corporation (formerly Philip Carey Corporation) was acquired by The Celotex Corporation in 1972. Since 1972, Celotex' records have been computerized and are maintained at the corporate headquarters in Tampa, Florida.

3. The invoice records are indexed by purchaser for some years and by the manufacturing plant for some years.

4. The invoice records are voluminous (approximately 1,000,000), and are not separated into "asbestos containing" and "asbestos-free" products.

5. Research to locate asbestos invoices indicating sales to a particular purchaser is virtually impossible, and would constitute an undue burden on this defendant.

6. Invoice records prior to 1967 have been previously destroyed in accordance with our long standing record retention policy.

FURTHER AFFIANT SAYETH NAUGHT.

Ken Brown
Ken Brown
Comptroller
The Celotex Corporation

STATE OF OHIO

COUNTY OF HAMILTON

Sworn and subscribed in my presence
this 22 day of April,
1982.

THE PHILIP CAREY MANUFACTURING CO.

LOCKLAND PLANT
November 6, 19[illegible]

SAFETY BULLETIN #5

ALL SUPERVISION

RESPIRATORS

No doubt we are all familiar with the old saying, "There is a reason f[illegible] everything." So it is with the wearing of respirators. There is a re[illegible] for wearing them.

It is not the intent to punish anyone by having them wear a respirato[illegible] have been provided to protect the employee against any dusts that we [illegible] that will prove harmful to the respiratory tract.

We have obtained what we think is the best possible respirator on the [illegible] that will do the job we have to do here. Each one has been approved b[illegible] U. S. Bureau of Mines and their approval number is stamped on each on[illegible] regardless of how good it will do the job -- it won't do it hung aroun[illegible] neck as a medallion.

It is only natural that we will have complaints against wearing of the respirator and we must all agree that it will be more comfortable to w[illegible] without one. When we investigate the complaint we find that it is bei[illegible] worn too high, too low, too loose, too tight, or the filter needs chan[illegible] Some operations will necessitate the changing of the filter daily. Th[illegible] can all be corrected.

You will also have complaints that the rubber face piece irritates the[illegible] This can be overcome by using the elastic cloth cover over the rubber[illegible] piece.

The respirators are issued from the Store-room by requisition of the F[illegible] and are in all cases charged against the employee. Please impress upo[illegible] employee that it is his equipment and is charged against him and care[illegible] it as his own property. Instruct the employee to wash them frequently[illegible] warm, NOT HOT, water. Periodically we will call them in to be sterili[illegible]

The Safety Supervisor will assit you in every possible manner.

We do want to call your attention to the fact that the respirator is o[illegible] a temporary measure to be used in dusty areas. It is our duty to elim[illegible] the dust by mechanical means and by isolation of the areas. However, [illegible] respirator should be worn until it is possible to control the dust ac[illegible]

Did you ever watch a baseball game and note all the paraphernalia the[illegible] wears? That is SAFETY EQUIPMENT --------- and he WEARS IT BECAUSE --- LIKES TO.

H. W. Drunk
Safety Supervisor

TO: F. D. Jopp

FROM: L. E. Ermenc

DATE: April 1, 1964

CC: J. W. Humphrey
E. C. Meisner
A. P. Mueller

SUBJECT: CAREYTEMP TESTING ON SAWING

Referring to your memo of March 18th to Mr. Barrett, some qualitative tests were run on sawing of Careytemp which may be of aid with your customers in reducing dusting during sawing of Careytemp. Our tests were run on a band saw and consisted of the following:

A. Dry sawing
B. Dipping Careytemp in water
C. Dripping water on saw blade

C was the most effective way of reducing dusting although B indicated a slight reduction. Dusting was not completely eliminated, but it was reduced possibly 50% due to some wetting action and agglomeration of the ultra-fines.

Until quantitative data can be developed on dusting characteristics of Careytemp, it would be recommended that customers provide a drip can of water a few inches above the material being sawed to allow a small quantity of water to hit the band saw blade to reduce dusting during sawing.

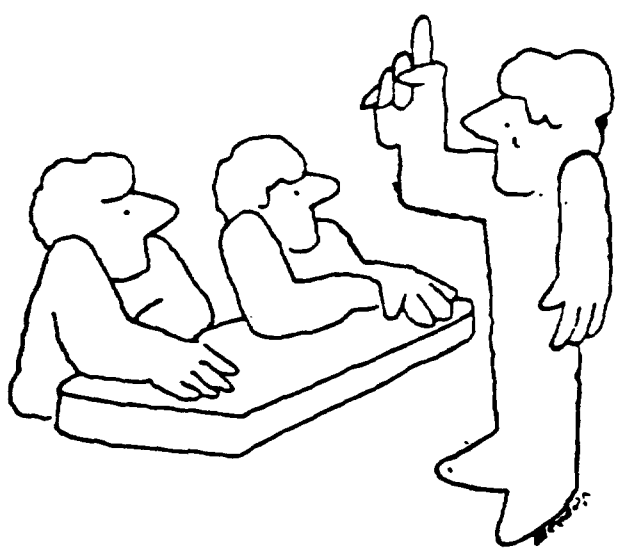
With regard to the normal dustiness of Careytemp, some exterior treatment might be required, but an additional cost would no doubt be necessary. Please keep Research informed and institute an SPR should you feel work is necessary to combat this problem.

ORIGINAL SIGNED BY
E. D. ERMENC

EDE/ab

EXHIBIT "J"

What You Should Know About Asbestos And Health



Frankly Speaking

You certainly are important to your family and loved ones, and you are important to the company. It makes good sense for the company to do everything possible to protect you in your working environment, and for you to take every precaution to avoid possible hazards to your health.

If your work involves the use of asbestos or asbestos-containing products, you should be aware of.

- What the health hazards can be.
- What obligations your employer has to protect you.
- What you can do as an individual to protect your own health and that of your fellow employees.

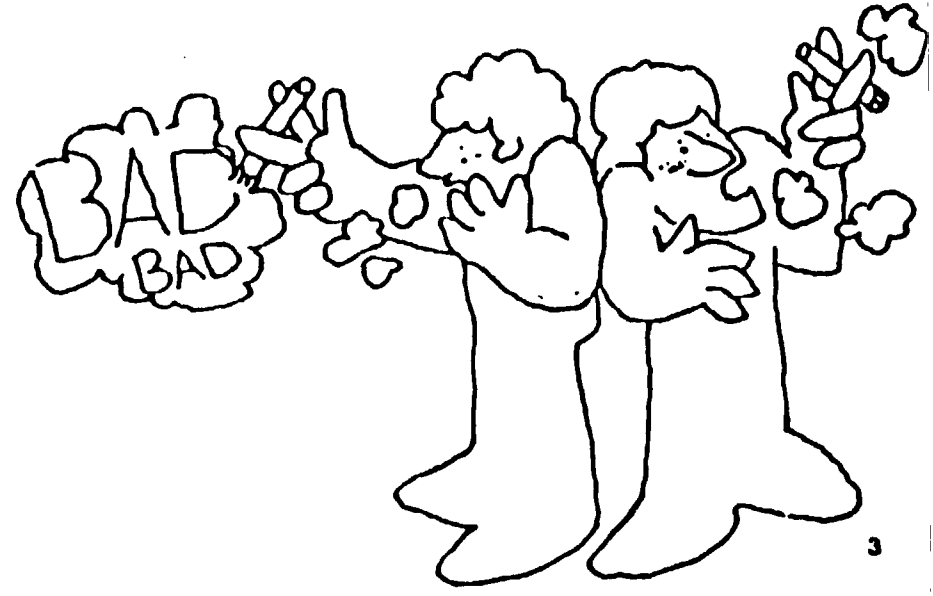
These are the Facts

Exposure to asbestos fiber can increase the risk of developing certain diseases over a period of years.

Reduction of asbestos dust exposure is at present the only known method of preventing disease among asbestos industry workers. Experience has shown that when dust levels are low, the risk to the worker and the incidence of asbestos-related disease is low.

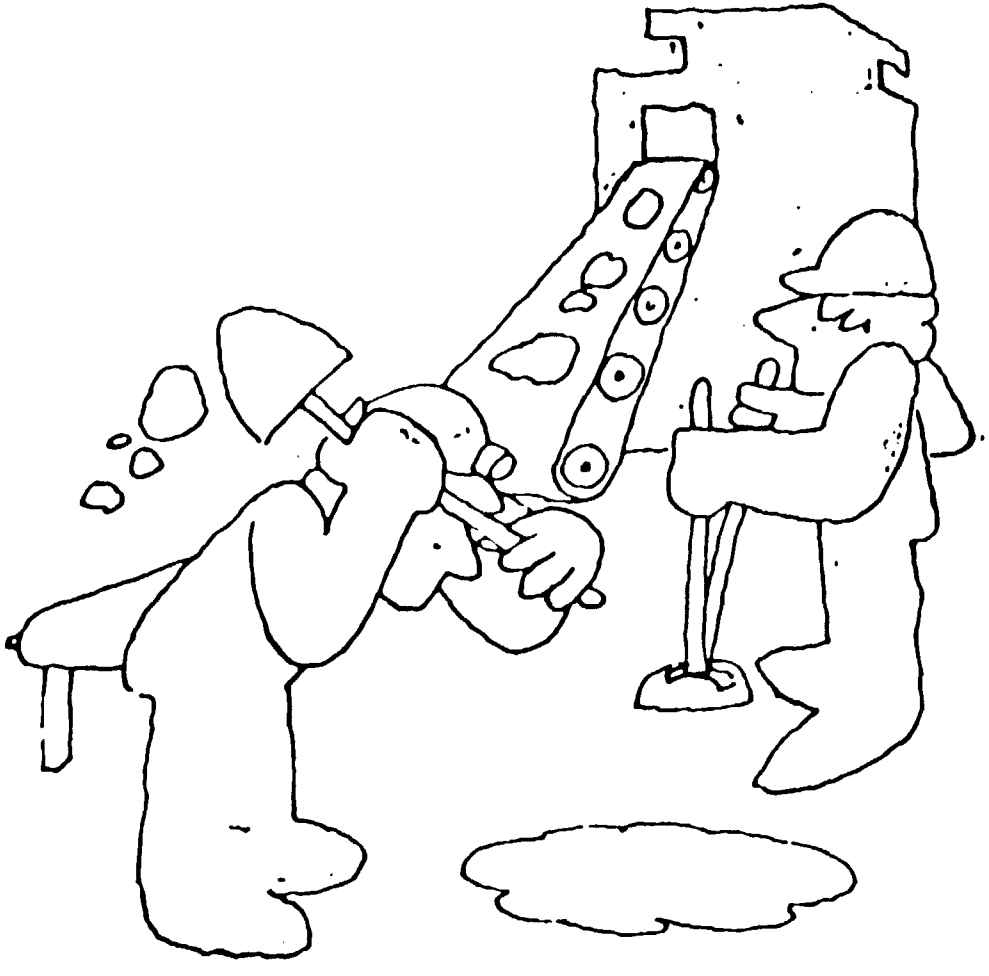
Now . . . About Smoking

It has been established that cigarette smoking greatly increases the risk of developing lung cancer in persons exposed to asbestos. On the other hand, asbestos industry workers who do not smoke cigarettes — and who never have smoked regularly — have shown no greater frequency of lung cancer than the average person who does not smoke.



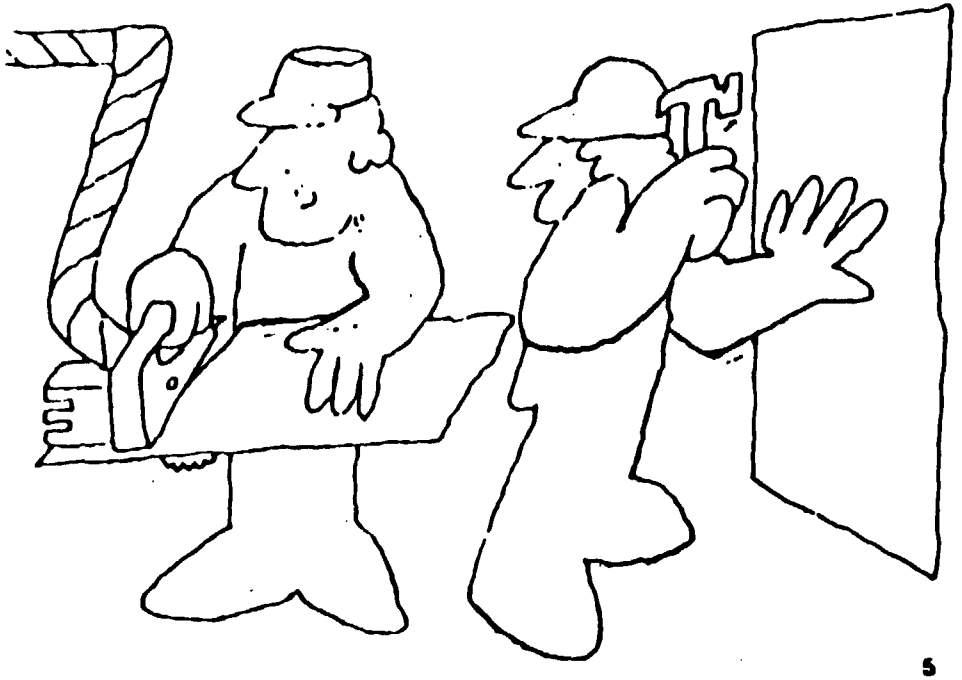
If You Work in a Plant or Mine

Employees in asbestos mines, mills, or product manufacturing plants will be exposed to airborne asbestos fiber. But, when dust levels in mines, mills and factories are properly controlled, the asbestos content of the air will be low and within safe levels, and will not be a hazard to workers.



If You Work in Field Operations

Most finished asbestos-containing products, when correctly used, will not produce dust levels high enough to be a hazard to workers. In more than 90% of the asbestos-containing products made in the United States, the asbestos fibers are "locked in" the product by means of cement, plastic or other binders. Consequently, the fibers are not easily released into the air, except during sawing or certain other machining operations. The tear-out, removal or demolition of old asbestos-containing insulations also can release fibers. Such operations must be carried out with approved methods of dust suppression and control.



Regulations to Protect You

To insure the safety of all, occupational standards for exposure to asbestos dust have been established by the Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor. These standards are designed to protect you from exposure to potentially hazardous amounts of asbestos dust and are being carefully observed by the company.

Here is what these standards provide:

1 A SAFE WORKPLACE

Your employer is required to make sure that no employee is exposed to more asbestos dust than permitted by the government standard. Your company will exert every effort to keep levels not only below permissible limits, but as low as possible.

2 IN CASE OF RISK

If exposure limits are exceeded, the employee will be notified by his employer, and will be informed of the corrective measures being undertaken to reduce his exposure to permitted levels.

3 CORRECTIVE ACTION

Engineering controls and safe work practices will be the approved methods of correction.

4 IN THE MEANTIME

While corrective measures are being taken, the employee will protected by other means, which may include the wearing of approved respirator provided by his employer, or by shift rotation.

5 TEMPORARY MEASURES

The use of respirators or shift rotation to achieve proper d control will be permitted only (a) during the time necessary install engineering controls or to institute safe work practic (b) in situations where such controls or practices are not technically feasible, or (c) in emergencies.

6 AND ONLY IF YOU PASS THE MEDICAL

No employee will be assigned to a task requiring the use o respirator if his most recent yearly medical examination indicates that he would not be able to function properly wh wearing one, or if the wearing of the respirator would creat hazard to the employee's health or safety.

7 SPECIAL PROTECTION WHEN NEEDED

Protective clothing, change rooms, and separate clothes lockers will be provided for employees in situations where exposure standards are exceeded.

8 CHECKING THE AIR

Monitoring of workplace air will be conducted by the employer to assure that government standards are being met. Employees may review results of the monitoring in their particular job areas.

9 SIGNS TO GUIDE YOU

Caution signs will be posted in work areas where airborne levels of asbestos may be in excess of the exposure limits, and where respiratory protection and special handling precautions are required. Employees should obey these signs at all times.

10 CAUTIONS ON PRODUCTS, TOO

Caution labels will be placed on asbestos-containing products which, during any reasonably foreseeable use, handling, application, machining or disposal may release asbestos fiber into the air in concentrations that exceed the exposure limits.

11 ANNUAL CHECK-UPS

The employer, at no cost to the employee, will provide yearly medical examinations for employees exposed to asbestos dust. Pre-employment and termination medical exams also are provided.

12 COUNSELING AND RESULTS AVAILABLE

Results of each employee's medical examination will be reviewed with him, and, at the worker's request, his own medical exam records will be made available to his family physician.

And, Most Important . . .

Another word about smoking. First, an assurance. If you do smoke cigarettes now and never have smoked them regular statistical studies show you have no greater chance of gettii lung cancer than a nonsmoker who has never worked wit asbestos.

But, on the advice of medical specialists: If you work with asbestos and you do smoke cigarettes, quit smoking! If yc work with asbestos and do not smoke, don't start!

Your family and the company need you and your special abilities. Guard your health in every way, but particularly wh cigarette smoking is concerned.

After You Leave Work

You also should take precautions to prevent taking asbest home on any work clothes or other materials in order to prot members of your family from possible exposure to asbest dust.

To reduce the possibility of carrying asbestos fibers home your person and clothing, facilities for showering and changing from work to regular clothes may be provided by y employer. Work clothing taken home for laundering should carried in a closed bag or container and then washed separately from other family clothing.

Never take loose fiber home. Your family should not be needlessly exposed to asbestos dust through any carelessn on your part.

What Else Can You Do?

Industrial safety and health can never be the responsibility of only one person. Both you and your employer must work together to provide a safe and healthy environment.

For safety in specialized areas, detailed work practices must be instituted to make sure we are complying with government regulations. As an employee, it is your duty to follow these work practices at all times. Never take shortcuts that may endanger your health and that of others.

If you see a possible hazard that your employer may have overlooked, bring it to his attention.

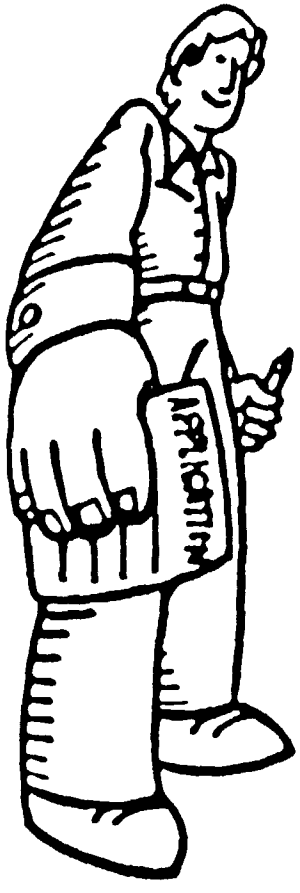
If you can suggest more efficient and safer work practices, do so. If you are not sure how to handle a material or perform an operation without creating dust, talk with your supervisor first.

REMEMBER

- Asbestos fiber may be hazardous to your health, and exposure to it, over a period of time, may increase your risk of developing asbestosis, cancer of the lung or digestive tract, or mesothelioma.
- Every precaution should be taken by you and your employer to keep dust levels low and to avoid unnecessary exposure.
- The asbestos industry is working hard to control dust exposure and to alert every worker to proper safety precautions. Government and company regulations designed to protect you and other workers against exposure to asbestos dust should be strictly followed by everyone.
- The vast majority of the thousands of finished asbestos products are not hazardous when properly handled or used, but workers who are engaged in their manufacture, fabrication or installation should be aware of possible dangers. Don't be careless — urge your fellow workers not to be.
- Asbestos is used in some 3,000 products daily throughout the world . . . products that help prevent and control fire in our homes, schools, factories, offices, hospitals and theaters . . . products that help stop our cars and trucks . . . products that save fuel and energy in this important time of conservation. If we are to continue making these much-needed products, it is important that you and your employer cooperate in maintaining the highest standards of safety and health on the job.

EXHIBIT "J"

before you begin



There Are Some Things You Should Know

Every person seeking employment in Celotex plants where asbestos fiber is used should know that breathing excessive amounts of asbestos causes certain health problems.

Celotex has taken many steps to protect you from exposure to harmful amounts of asbestos fiber. To make these steps effective, you must follow safe working rules on the job.

The health problems

so we can be sure

Tear Off This Form at the Dotted Line

Hand In the Form, But Keep This Booklet and Refer to It O

Have you read the whole booklet? ____ Yes ____

Do you understand the health risks connected with asbestos? ____ Yes ____

Do you understand that smoking cigarettes increases the health risks connected with asbestos? ____ Yes ____

Do you understand that you will have to follow certain work rules set by the company to protect you? ____ Yes ____

Do you have any questions about what you have read in this booklet? ____ Yes ____

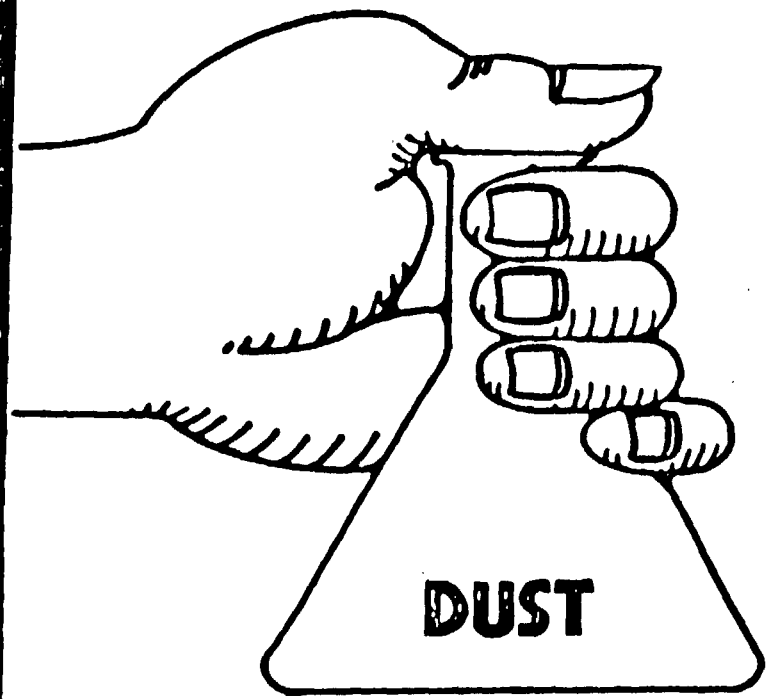
Please sign your name and put today's date below.

Signed _____ Date _____

The health problems we can be sure of

The health problems that have been connected with exposure to asbestos are these:

- Breathing excessive amounts of asbestos fiber in the air might result in a disease called **asbestosis** - a scarring of the lung tissue which, when severe, makes it difficult to breathe properly
- Persons who smoke cigarettes and inhale excessive amounts of asbestos dust are at a greater risk of developing **lung cancer**. Asbestos alone does not appear to cause this disease, but it can make people who smoke cigarettes more likely to develop this cancer. Studies show that if you don't smoke cigarettes, asbestos exposure does not increase your risk of getting lung cancer.
- Persons exposed to excessive amounts of asbestos have a greater risk of developing **mesothelioma**, which is a rare cancer of the lining of the chest or abdomen. There also is some indication from unconfirmed studies that there might be a greater incidence of **cancer of the digestive tract** in persons exposed to excessive amounts of airborne asbestos.



Be concerned, not alarmed about asbestos-related health problems in coming to work for Celotex today. Present cases of the health problems we mentioned are related to working conditions that existed many years ago. As we became aware of the risks, Celotex began spending millions of dollars to improve equipment and processes and to upgrade dust control systems to prevent excessive asbestos exposures. We are confident that as long as employees follow safe work rules and equipment is operated properly, no employee will be exposed to hazardous amounts of asbestos fiber in our operations.

To assure continued control of risk, the company will be regularly checking asbestos-using operations with trained industrial hygienists. You must cooperate with these hygienists when they are checking your work areas.

Government inspections also are made of our facilities to make sure you are not being exposed to hazardous levels of asbestos. The government has set standards that limit how much asbestos you can be exposed to, and Celotex abides fully with those regulations.

Be concerned, not alarmed — So we can be sure.

You will be required to do certain things on the job to help us protect you. Some of these are:

1 You **must** do everything you can to prevent dust or getting asbestos fiber into the air where it could be inhaled.

2 Strict rules about how to perform your job **must** be followed at all times.

3 In some areas you may at times be required to wear a respirator temporarily or other forms of personal protective equipment. You **must** wear this equipment properly whenever it is necessary.

4 You will be requested not to smoke on the job if you might be exposed to asbestos

5 You **will not** be permitted to take any asbestos material home from the plant in order to prevent exposing others. You will be encouraged to use facilities provided to change work clothes and wash before going home.

6 If equipment is not working correctly, you **must** report it to your supervisor immediately

so we can be sure

VIOLATION OF HEALTH WORK RULES CAN RESULT IN DISMISSAL.

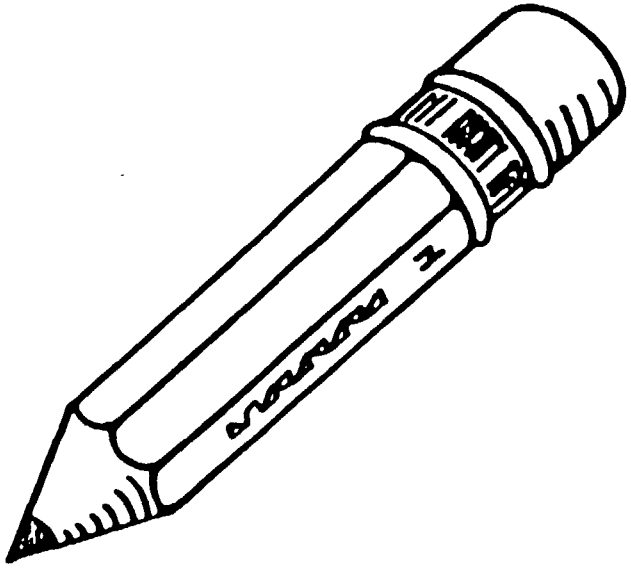
After you begin work, you will be given an opportunity to learn more about the potential health risks of asbestos and what the company is doing to protect you on the job. You will be taught how to use personal protective equipment and other methods of protecting yourself. Because of the efforts of Celotex and your own efforts, it is likely that you will be as safe working for Celotex as in any other occupation or endeavor.

That is the way we want it. We will not take chances with your health and we won't allow you to take chances with it.

Violation of health work rules can result in dismissal.

After you begin work
So we can be sure

REFER TO THIS BOOKLET OFTEN



So we can be sure you have read this booklet and know about the potential risks connected with your job and the strict rules you must follow, we would like you to fill out the form at the right, sign and date it. This sheet will become a part of your employment record and is to be filled out before you start work.

So we can be sure

INDUSTRIAL INSULATION
DISTRIBUTOR/CONTRACTOR
MAILING LIST

A. C. & S.
501 Amsterdam, N. E.
Atlanta, GA 30306
Attn: W. K. Jones

A. C. & S.
2919 3rd Avenue N.
Birmingham, AL 35202

A. C. & S.
11 Keeler Ave.
Chicopee, MA 01020

A. C. & S.
25 East 76th Street
Cincinnati, OH 45216
Attn: R. R. McElhaney

A. C. & S.
7700 Wall Street Valley View
Cleveland, OH 44125

A. C. & S.
9620 Gerwig Lane
Guilford Industrial Center
Columbia, MD 21046

A. C. & S.
1515 Delashmut Ave.
Columbus, OH 43212
Attn: R. D. Collier

A. C. & S.
9140 Premier Row
Dallas, TX 75247

A. C. & S.
898 Providence Highway
Dedham, MA 02026
Attn: Warren A. Maggio

A. C. & S.
4801 E. 39th Ave.
Denver, CO 80207
Attn: G. H. Stewart

A. C. & S.
466 E. Manlius St.
E. Syracuse, NY 13057
Attn: L. E. Willits

A. C. & S.
P. O. Box 4316
Harrisburg, PA 17111

A. C. & S.
749 S. Grant Ave.
Indianapolis, IN 46203
Attn: W. L. Roberts

A. C. & S.
569 Nixon Street
Jacksonville, FL 32203
Attn: E. P. Avery

A. C. & S.
1809 Liberty
Kansas City, MO 64102
Attn: D. T. Norton

A. C. & S.
180 Church Street, P. O. Box "T"
King of Prussia, PA 19406
Attn: D. F. Andrew
T. E. Decker

A. C. & S.
1301 Laura Lane
Lake Bluff, IL 60044
Attn: J. L. Griggs

A. C. & S.
120 N. Lime St.
Lancaster, PA 17604
Attn: George C. Follmer
Doris Harlen
H. W. March

A. C. & S.
15 East 21st Street
Linden, NJ 07036
Attn: J. Acello

A. C. & S.
2316 Watterson Trail
Louisville, KY 40299
Attn: C. L. Wright

A. C. & S.
P. O. Box 25379
Menomonee Falls, WI 53225
Attn: E. F. Keane

A. C. & S.
611 Cowan Street
Nashville, TN 37207

A. C. & S.
468 Park Avenue, South
Res. 1704-5
New York, NY 10016
Attn: S. Andersen
I. H. Greiff

A. C. & S.
21251 Meyers Road
Oak Park, MI 48237
Attn: J. Blair

A. C. & S.
4229 Lafayette
Omaha, NB 68131
Attn: Bill Gilmore (2)

A. C. & S.
612 W. Romana St.
P. O. Box 12692
Pensacola, FL 32574
Attn: Jo Anne Dicsmore

A. C. & S.
922 West Detweiller Drive
Peoria, IL 61614
Attn: T. J. Scherer

A. C. & S.
4485 Campbell's Run Road
Parkway West
Pittsburgh, PA 15205
Attn: J. A. Ockerman

A. C. & S.
9601 Balmoral Avenue
Rosemont, IL 60018
Attn: L. B. McNabb

A. C. & S.
6 Enterprise Dr.
Savannah, GA 31402
Attn: E. J. Valence

A. C. & S.
6800 Odell St.
St. Louis, MO 63139
Attn: J. S. Taylor

A. C. & S.
5225 W. 75th St.
Shawnee Mission, KS 66208
Attn: C. W. Fowler

A. C. & S.
352 Morris Street
Toledo, OH 43602
Attn: R. J. Sine

A. C. & S.
223 E. Archer St.
Tulsa, OK 74103
Attn: B. W. Page

A. C. & S.
Quaker Lane Industrial Park
99 Telmore Road
Warwick, RI 02818
Attn: R. G. Stephenson

A. C. & S.
980 Silasdeane Highway
Wethersfield, CT 06109
Attn: R. H. Lee

A. C. & S.
721 Jordan Parkway
White Hall, PA 18052
Attn: F. L. Blanchard

A. C. & S.
3315 Capitol Trail
Wilmington, DE 19808
Attn: J. A. Lorelli

A. D. C. Contractor & Supply Co
209 Center Street
Bridgeport, CT 06604
Attn: Jim Noll

A & K Midwest Insulation Compan
Highway 45 East
Metropolis, IL 62960
Attn: Jim Alexander

A & M Insulation Company
2614 Clybourn Avenue
Chicago, IL 60614
Attn: Phil Schneider
Jim Gibbons

A & M Insulation Company
1818 W. Chunute Rd.
Peoria, IL 61600
Attn: Dick Stevenson

A. F. I., Inc.
2366 Rose Place
St. Paul, MN 55113
Attn: Lee R. Anderson

Paul W. Abbot Company
708 Vandalia
St. Paul, MN 55114

The Aber Company, Inc.
P. O. Box 2683
Houston, TX 77001
Attn: D. G. Adair

Alexander Stafford Company
32 Grandville Avenue
Grand Rapids, MI 49502

Alfol, Inc.
9839 York Road
Charlotte, NC 28210
Attn: Steve Watson

Allied Insulation Supply
315 N. 12th Street
Milwaukee, WI 53233
Attn: Jack Flack

Allied Rubber & Gasket Co.
P. O. Box 518
Waverly, TN 37185
Attn: J. L. McCraskey

Allied Service, Inc.
P. O. Box 9132
Charleston, WVA 25309

All Temp Insulation, Inc.
1501 North C Street
Sacramento, CA
Attn: Ed Seifiert

American Asbestos Company
600 Alabama St.
San Francisco, CA 94110
Attn: Ray Colman

American Industrial Contractors
263 E. Beaver
Sewickley, PA 15145

Anco Insulations
P. O. Box 66596
Baton Rouge, LA 70806
Attn: T. L. Virgets (6)

Anco Insulations, Inc.
7762 Braniff St.
Houston, TX 77061
Attn: Don Gideon

Anco Insulations
102 North 20th Street
Tampa, FL 33605
Attn: Ed Swindel

Ed H. Anderson Company
P. O. Box 2759
St. Paul, MN 55112
Attn: Ed Anderson

Jay L. Angel
701 N. Wheeling St.
Toledo, OH 43605

Apex Insulation Company
432 Margaret St.
Box 40066
Jacksonville, FL 32203

Applied Mechanical Insulation,
P. O. Box 5362
Lenexa, Kansas 66215
Attn: David Hall

Arkansas Ind. Insulator
209 S. Redmon Road
Jacksonville, AR 72076

Arnold Insulation, Inc.
505 Harvester Ct.
Wheeling, IL 60090

Asbestos Insulating Co., Inc.
311 W. Marshall St.
Norristown, PA 19401
Attn: W. McClure

Aabestos Insulation and Rfg. Co
312 South Harrison Avenue
Fort Wayne, IN 46801

Asbestos Insulation & Supply Co
1132½ Stinson Blvd., N. E.
Minneapolis, MN 55413
Attn: John Carlson

Atlantic Gasket Corp.
3908-18 Frankford Avenue
Philadelphia, PA 19124

B & B Contracting & Supply Company
4831 Lakawana
Dallas, TX 75247

B & B Insulations
P. O. Box 2531
Houston, TX 77001
Attn: John Pyle

B & W Construction Company
Copley, OH 44321
Attn: Purchasing Department

B & W Company
4282 Strausser Street, N. W.
North Canton, OH 44730
Attn: J. F. Baumgartner

Jack Barsh Insul. Company
1935 E. Beaver
Jacksonville, FL 32201
Attn: Jack Barsh

Bartell Insulation Supply, Inc.
1330 Ballard Road
Appleton, WI 54911
Attn: Larry Fondow

E. J. Bartells Company
700 Powell Avenue SW
Renton, WA 98055
Attn: Dave Pollard

Battey Machine Company
P. O. Box 33
Rome, GA 30161

Bay Insulations Company
P. O. Box 532
Green Bay, WI 54305
Attn: Arnold W. Schmidt

Guy M. Beaty Company
520 S. Elliot Street
Charlotte, NC 28201
Attn: Mr. Roy Beaty

Guy M. Beaty Company
1105 Carter St.
Chattanooga, TN 37401
Attn: Melvin Cooper

Guy M. Beaty Company
Box 3598
Greenville, SC 29608

Bigham Insulation & Sply Co.
P. O. Box 22146
Ft. Lauderdale, FL 33315
Attn: Dan Bigham

Bodwell-Lemmon Company
10701 Broadway
Cleveland, OH 44125
Attn: Steve Powell (3)

Boss Insulation Company
Pringle Street
N. Charleston, SC 29410
Attn: Mike Malone

Brand Insulations
40 Patton Road
E. Providence, RI 02916
Attn: Ray Krupa

Brand Insulations Company
216 Powhattan Avenue
Essington, PA 19029
Attn: T. G. Stewart

Brand Insulations
1420 Renaissance Drive
Park Ridge, IL 60068
Attn: H. N. Ferreira

Branton Insulations, Inc.
P. O. Box 5513
Fulton Road Station
Mobile, AL 36605
Attn: Howard Sheppard

Branton Insulation Company
P. O. Box 10536
New Orleans, LA 70181
Attn: Steve Miller

Breeding Insulation
P. O. Box 5207
Chattanooga, TN 37406

Breeding Insulation Co.
Box 1005
Little Rock, AR 72203
Attn: Curtis Breeding

Breeding Insulation Company
800 Ewing Avenue
Nashville, TN 35202
Attn: Jim McClure

Brennan Insulation
2541 Mitchell Avenue
Knoxville, TN 38917
Attn: Dave Gardner

Earl E. Bright, Inc.
970 Higgs Avenue
Columbus, OH 43205
Attn: J. R. Hunsinger

The Brower Company
818 S. Dakota Street
Seattle, WA
Attn: Ben Kingsman

Brown Insulation Company
16200 Hubbell
Detroit, MI 48235

Brown Refactory Company
3545 W. Morris Street
Indianapolis, IN 46241

Building Services Ind. Sales
620 N. 108th Place
Milwaukee, WI 53226
Attn: George Leisenring
Al Simmonsen

Building Sprinkler Company
P. O. Box 2864
Fargo, ND 58102
Attn: W. C. Sornsin

Burnett Process Inc.
Court Street Road
Syracuse, NY 13206

* * * * * * * * * * * * * * * * *

Calon Insulation Corp.
1130 Convery Blvd.
Perth Amboy, NJ 08861
Attn: C. Hnatt

Carolco
8509 May St.
Tampa, FL 33614
Attn: Sammy Ward

Candle-Hyatt Inc.
P. O. Box 127
Hopewell, VA 23860
Attn: O. E. Hyatt

Cardinal Industrial Insul. Co.
123 S. Eighth St.
Louisville, KY 40202

Cid Carpenter Marine Corp.
528 North Marine
Wilmington, CA 90744
Attn: Cid Carpenter

Central Insulation
2020 Wyandotte St.
Kansas City, MO 64108
Attn: Jack McInnes (2)

Champaign A & K Insulations
P. O. Box 522
Champaign, IL 61820

Chicago Asbestos Mfg. Co.
510 N. Dearborn Street - Rm 526
Chicago, IL 60610
Attn: Jay Golinkin

Chicago Pipe and Boiler Covering
800 Seton Court
Wheeling, IL 60090
Attn: William Briggs

Clark Asbestos Company
1893 East 55th St.
Cleveland, OH 44103

Claxton Asbestos Company
31 Coit Street
Buffalo, NY 14296

Cleland Company
1415 Park Avenue
Lynchburg, VA 24501
Attn: Mr. Cleland

Colombia Asbestos Inc.
723 N. Tillamook St.
Portland, OR 97227
Attn: Charles Stilson

Commercial Insul. Sply. Co.
8517 Directors Row
Dallas, TX 75247

Complete Insulation Service
90 Vermont St.
Dayton, OH 45404

Consolidated Western Contr. Inc.
14935 East Clarke Avenue
City of Industry, CA 91744
Attn: Dick Austin (2)

Covil Insulation
721 Roosevelt Avenue
Albany, GA 31701
Attn: Don Moore

Covil Insulations Company
One Ninth St.
Augusta, GA 30902

Covil Insulation Company
Box 6174
Greensboro, NC 27405
Attn: Gerald Greeson

Covil Insulation Company
P. O. Box 1804
Greenville, SC 29602
Attn: Sonny Garren

Covil Insulation
P. O. Box 265
Wilson, NC 27893
Attn: A. C. Hardison

Cox Insulation Service
2867 Stanton Avenue
Cincinnati, OH 45206

Crossroads Sales, Inc.
P. O. Box 26
Western Springs, IL 60558
Attn: William Smurdon

Cummings Insulation Co.
198 State Street
Meriden, CT 06450
Attn: Joe Pasquale

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Daniel International
P. O. Box 161
Gonzalez, FL 32560
Attn: C. A. Adams

J. R. Deans Company
25 Ann Street
Charleston, SC 29403
Attn: James Rock

Delaware Insulation Company
5th Avenue & Coleman St.
Wilmington, DE 19805
Attn: G. Stagliano

Dill Insulation Prod. Company
1002 Murphy Avenue
Joplin, MO 64801
Attn: G. Dill

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E & S Insulation Company
7100 Medicine Lake Road
Minneapolis, MN 55427
Attn: Larry Sawatzke

Eagle Asbestos and Packaging
P. O. Box 51568
New Orleans, LA 70118
Attn: Bill Yetta

Eagle Company, Inc.
P. O. Box 81045
Lincoln, NB 68501
Attn: F. Blatt

Eastern Industrial Insulation Compa
101-119 Pear Street
Reading, PA 19602
Attn: Donald Duffy

Eastern Refractories Co., Inc.
20 Flanders Road
Belmont, MA 02178
Attn: William Bragdon

Econotherm Insulation Company
P. O. Box 18247
Houston, TX 77023
Attn: Wayne McClelland

Ellington Insulation Company
2010 N. Kerr Avenue
Wilmington, NC 28401
Attn: Hoss Ellington

Empire Ace Insulation Mfg.
1 Cozine Ave.
Brooklyn, NY 11207

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Gabler Insulation
1330 Tchoupitoulas Street
New Orleans, LA
Attn: Chas Gabler

Gastonia Pipe, Boiler & Duct
Insulation, Inc.
520 E. Davidson Avenue
Gastonia, NC 28052
Attn: Bill Dye

General Insulation Company
22 Cross Street East
Somerville, MA 02145
Attn: Ed Urquhart

General Insulation, Inc.
129 McKinley Street
East Peoria, IL 61611
Attn: Virgil Fawer

General Pipe Covering, Inc.
6801 W. Lake Street
St. Louis Park, Minnesota 55426
Attn: Sheldon Dingley

Goodwin Insulation
1083 E. Main St.
Torsington, CT 06790

J. Graves Insulation Company
P. O. Box 8830
Shreveport, LA 71108

Great Barrier Insulation Co.
Route 2
Decatur, AL 35601
Attn: Paul Kennard

Great Barrier Insulation Company
212 E. Garden Street
Pensacola, FL 32585
Attn: Jim Busby (10)

* * * * * * * * * * * * * * * * * *

Hajoca Corporation
P. O. Box 351
Chattanooga, TN 37403

J. F. Harrison, Inc.
5050 North Port Washington Road
Milwaukee, WI 53217
Attn: J. F. Harrison

R. P. Hedley - Company
153 W. Main Street
Redonia, NY 14063
Attn: R. P. Hedley

Hefco, Inc.
Box 1747
Greenville, SC 29602
Attn: Dave Heafner

A. C. Heins
127 Heins Street
Knoxville, TN 37901
Attn: Ruth Love

Heller Enterprises, Inc.
4310 N. 3rd Street
Philadelphia, PA 19140
Attn: F. Heller

Hickory Insulation
1750 Thomas Avenue
St. Paul, MN 55104
Attn: Charles Wiley

Hinman Corporation
24 Cross Street
E. Somerville, MA 92144
Attn: Bill Hinman

Hippler Insulation Services
Box 1141
St. Cloud, MN 56301
Attn: Ray Hippler

Holt Insulations, Inc.
38th & Nona Street
N. Little Rock, AR 72118
Attn: Bill Holt, (2)

Hullinghorst Industries, Inc.
Rt 5, Leisure Road
Baton Rouge, LA 70817
Attn: J. E. Duvie

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Illinois Indiana Insulations
P. O. Box 2127
Hammond, IN 46320
Attn: Don Schrader

Illinois Insulation & Const. Co.
3636 South Iron Street
Chicago, IL 60609
Attn: Howard Johnson

Industrial Assoc., Inc.
1510 Adams Street East
P. O. Box 3996, Station F
Jacksonville, FL 32206
Attn: R. A. Andrea

Industrial Insulations
2101 Kenmore
Buffalo, NY 14207
Attn: Ed Kemerer

Industrial Insulations, Co., Inc.
146 Cumberland
Memphis, TN 38105
Attn: Mr. Curley (2)

Industrial Insulations, Inc.
Germania & Main Streets
Bay City, MI 48706
Attn: Jim Graham

Industrial Insulation Corp.
1314 W. College Avenue
Appleton, WI 54911
Attn: William Bero, Jr.

Industrial Insulations, Inc.
3142 Bellaire
Kansas City, MO 64129

Insul, Inc.
169 James Avenue North
Minneapolis, MN 55405
Attn: Nels Gronquist

Insulating & Materials
1042 Central Industrial Drive
St. Louis, MO 63110
Attn: Elmer Mittler (3)

Insulating Contracting, Inc.
Conception Street
Mobile, AL 36601
Attn: Roy Coffer, Jr.

Insulation & A/C Supply
5332 W. Crenshaw
Box 15581
Tampa, FL 33814

Insulation Distributors
356 Hertel Avenue
Buffalo, NY 14240

Insulation Sales Company
3001 Grand Avenue
Neville Island, PA 15225
Attn: Bill Hager

Insulation Sales Service
P. O. Box 3474
Baton Rouge, LA 70821
Attn: Angelo Reno

Insulation Sales, Inc.
16200 Hubbell
Detroit, MI 48235

Insulation Services
P. O. Box 7726
Tulsa, OK 73105 (12)

Insulation Specialties
3113 Hillsborough Road
Durham, NC 27705

Insulco
P. O. Box 375
Lima, OH 45801

Insulco Supply & Mfg. Co.
519 East Marine View Avenue
Belmont, CA 94002
Attn: John Voorhees

Insulcon, Inc.
4333 Merriam Drive
Overland Park, Kansas 66203
Attn: Elton Burner

Iowa Asbestos
112 S. W. 2
Des Moines, IA 50309
Attn: B. Townsend (2)

Iowa Illinois Thermal Insulation
1304 West 4th Street
Davenport, IA 52804
Attn: Jim Groves

Iowa Illinois Thermal Insulation
P. O. Box 442
Waterloo, IA 50704
Attn: Russ Martin

* * * * * * * * * * * * * * * *

J. W. R. Sales Company
P. O. Box 3375

Janes Industrial Insulation Co.
80 Commercial Avenue
Moonachie, NJ 07084
Attn: T. J. Connolly

Johns-Manville Sales Corporation
P. O. Box 5730
Jacksonville, FL 32207
Attn: Ben Bryan

Johns-Manville Sales Corporation
P. O. Box 565
Madison Heights, MI 48071 (2)

Johns-Manville Sales Corp.
11525 Rock Island Court
Maryland Heights, Missouri 63043
Attn: J. A. Grimmer

Johns-Manville Sales
1222 Quebec
North Kansas City, MO 64116
Attn: C. Martin (2)

Johns-Manville Sales Corp.
P. O. Box 16989
Temple Terrace, FL 33687
Attn: Bob Zeigler

* * * * * * * * * * * * * * * * * *

K - T Insulation, Inc.
1001 East MacArthur Street - #66
Wichita, Kansas 67216
Attn: Rock Kilgore

Kankakee Insulations
P. O. Box 1748
Kankakee, IL 60901
Attn: Mike Coleman

Kansas Insulation, Inc.
504 East Douglas
Wichita, KS 67202 (2)

Robert A. Keasbey Company
139-149 W. 19th Street
New York, NY 10011

Robert A. Keasbey Company
Commercial Building
Syracuse, NY 13211
Attn: Bert Kime

R. E. Kramig Company
323 South Wayne Avenue
Cincinnati, OH 45215
Attn: R. E. Kramig
R. Staubitz

Paul J. Krez Company
Westmoreland Building
Old Orchard Road
Skokie, IL 60076
Attn: Phil Albracht
Paul Helmer

* * * * * * * * * * * * * * * * * *

LK Material Services
4433 E. Park Drive
Bay City, MI 48706
Attn: Paul Lurer

L & L Insulation & Supply Co.
107 3rd Street
Des Moines, IA 50309
Attn: L. L. Thompson

L & S Insulation Company
616 S. 89th Street
Milwaukee, WI 53214
Attn: Elmer Borchardt

Lance Construction Supplies
4225 West Ogden Avenue
Chicago, IL 60623
Attn: J. Lance

Land Coast Insulation Company
P. O. Box 52823
Lafayette, LA 70501
Attn: Ed Morton

Louisville Insulation & Sply.
4601 Indian Trail
Louisville, KY 40213

Ludeman Insulation
203 N. Handley
Box 888
Wichita, KS 67201
Attn: J. Pfister (4)

Luse Stevenson Company
4934 West Fifth Avenue
Gary, Indiana 46406
Attn: Gary Geovanelli

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MBM, Inc.
231 North Weber Avenue
Sioux Falls, South Dakota 57102
Attn: Ed Scott

M & L Industrial Insulation, Inc.
Highway 2 and 52 East
Minot, North Dakota 58701
Attn: Darrel Larson

MacArthur Company
3201 Brighton Blvd.
Denver, CO 82016
Attn: Bob Stockhouse (3)

MacArthur Company
936 Raymond Avenue
St. Paul, MN 55114
Attn: Len Krumrie

MacArthur Company
1416 "B" Avenue
Sioux Falls, SD 57104
Attn: Jim Nelson

Maroco, Inc.
P. O. Box 3756
Port Arthur, TX 77640
Attn: Mark Coleman

Mattew Balich Corporation
37-08 34th Street
Long Island City, NY 11101
Attn: F. Brady

T. G. MacCracken, Inc.
1818 Bible Road
Lima, OH 45802
Attn: D. Bowers

McCarty Corporation
P. O. Box 53277
Baton Rouge, LA 70805
Attn: Larry Simon

McDowell Insulation Co.
9204 Collins Ave.
Pennsauken, NJ 08110

Joe McGill Company, Inc.
P. O. Box 1600
Wichita, KS 67202

The McCormick Asbestos Company
3620 Woodland Avenue
Baltimore, MD 21215
Attn: J. Shunk

Mechanical Insulation Company
P. O. Box 623
Bloomington, IL 61701

Mechanical Insulation Co.
P. O. Box 423
Kewanee, IL 61443
Attn: T. E. Sleeper

Mechanical Insulation Services
Box 4568
Florence, SC 29501
Attn: Larry Crawford

Mechanical Insul. Services, Inc.
6409 Ambassador Drive
Tampa, FL 33651
Attn: K. C. Buchanan

Metalclad Insulation Corp.
2911 East Harcourt St.
Compton, CA 90221
Attn: Bob Dodge

Metalclad Kircher
2114 W. Fillmore St.
Phoenix, AZ 85009
Attn: Gene Samson

Midcontinent Supply Co.
P. O. Box 189
Ft. Worth, TX 76101
Attn: Mel Hogan

Middletown Development & Sply. Co.
P. O. Box 369
Middletown, OH 45042

Midwest Insulation Services, Inc.
1016 Douglas St.
Omaha, NB 68102
Attn: Al Wotherspoon (2)

Midwest Materials Company
P. O. Box 5
Joplin, MO 64801

Midwest Materials Company
M.P.O. Box 845
Springfield, Missouri 65801

Monroe Rubber & Gasket Company
317 Walnut St.
Monroe, LA 72101

Joe Moore & Son
P. O. Box 6531
Raleigh, NC 27608
Attn: Joe Moore

Moore Insulation Company
7505 W. 80th St.
Overland Park, KS 66204

John J. Moroney & Company
6817 Minnesota Drive
Bedford Park, IL 60501
Attn: Jack Calmeyn
Bill Humprey

Mundet Company
14401 Prairie Street
Detroit, MI 48238

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Nashville Rubber & Gasket Company
600-4th Avenue, South
Nashville, TN 73211
Attn: Steve Maddox

Nelson Roanoke Corporation
P. O. Box 2827
Roanoke, VA 24012
Attn: H. R. Davis

New England Insulation Company
155 Will Drive
Canton, MA 02021
Attn: Don Kautman

New Haven Supply Company
2000 Bullhead Road
New Haven, OH 44850

Niagara Insulations, Inc.
79 Perry Street
Buffalo, NY 14203
Attn: R. C. Braun

North Bros. Company
P. O. Box 252
Atlanta, GA 30301

North Bros. Company
Ruffner Road

North Bros. Company
P. O. Box 6786
Birmingham, AL 35210

North Bros. Company
79 Reid Street
Charleston, SC 29403
Attn: L. C. Koon

North Bros. Company
Box 3338
Columbia, SC 29203
Attn: William Hope

North Bros., Inc.
901 S. W. 21st Terrace
Ft. Lauderdale, FL 33312
Attn: Buddy Hammond

North Bros., Inc.
2221 Pearl St.
Jacksonville, FL 32202
Attn: Jim Valentine

North Bros.
5800 Middlebrook
Knoxville, TN 37901
Attn: Jim Rogers

North Bros. Company
Box 8443, 995 N. Hollywood
Memphis, TN 38108
Attn: Tony Hope (5)

North Bros., Inc.
P. O. Box 7817
Orlando, FL 32804
Attn: Monty Wells

North Bros. Company
Box 26146
Raleigh, NC 27611
Attn: Billy Jackson

North Bros., Inc.
P. O. Box 5296
Tampa, FL 33605
Attn: DeForest Whitcomb

Northwestern Insulation Company, In
P. O. Box 521
Ballevue Road
Green Bay, WI 54305
Attn: Norman Vance

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Ohio ET, Inc.
950 Main St.
Columbus, OH 53205

O'Malley Bros. Inc.
3925 W. Oakton St.
Skokie, IL 60076

Ohio Valley Insulating Co.
823 Adams Avenue
Huntington, WV 25704

Owens Corning
7000 McLarin Road
Fairburn, GA 30213

Owens Corning
434 Ingeraham Bldg.
25 S. E. 2nd Avenue
Miami, FL 33131

Owens Corning Fiberglas
592 W. Swedesford Road
Berwyn, PA 19312
Attn: R. Adams

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Pacific Insulation
5716 N. E. Hassolo Street
Portland, OR 97213
Attn: John Bruniengo

Palco Insulation & Sales
221 Oak Street
Quincy, IL 52301
Attn: Mark LeGrand

Pamrod, Inc.
P. O. Box 335
McQueeny, TX 78123

Penns Valley Insulation
15 Mt. Pleasant Dr.
Rolling Hills Ind. Park
Aston, PA 19014

Petrin Insulation Co.
P. O. Box 1215
Thibodaux, LA 70301

Piedmont Insulation
P. O. Box 784
Salisbury, NC 28144

Plant Insulation Company
1300 64th Street
Emeryville, CA 94662
Attn: Ray Scott

Plateau Supply
2401 E. 40th
Denver, CO 80204
Attn: E. Holiman

Porter-Hayden Company
32 South Street
Baltimore, MD 21202
Attn: Bob Schwenson

Porter-Hayden Company
P. O. Box S
Charlotte, NC 28203

Porter-Hayden Company
Box 476
Edison, NJ 08817
Attn: O. Richards

Porter-Hayden Company
Box 10142
Norfolk, VA 25513
Attn: J. A. Apple

Porter-Hayden Company
P. O. Box 2116
Ashland, VA 23005
Attn: R. L. Huggins

Power Insulation Co.
2335 Nevada Avenue N.
Minneapolis, MN 55427

Precision Insulation Company
7792 Braniff Road
Houston, TX 77017
Attn: Chas Lancaster

Presnell Insulation
501 Alando Avenue
Charlotte, NC 28206
Attn: Jack Presnell

Price Contracting Company
2536 Northline Industrial Drive
Maryland Heights, Missouri 63043
Attn: B. S. Price

Pro Con Inc.

Ratican Insulation Company
6324 Bartmer Avenue
St. Louis, MO 63130
Attn: Walter Ratican

Rite Way Insulation Ltd.
1011 Lunt Avenue
Schamburg, IL 60193

Roughrider Supply, Inc.
5 N. 23rd St.
P. O. Box 1222
Fargo, ND 58102
Attn: Arlin Foss

F. P. Rutherford Insulation Co.
5701 Manchester Avenue
St. Louis, Missouri 63110
Attn: Frank Rutherford

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Sabine Industries
P. O. Box 15377
Houston, TX 77020
Attn: Herb Hillberg

Sabine Industries
P. O. Drawer 1
Orange, TX 77630
Attn: T. Bowers

Sadler Ind. Services, Inc.
P. O. Drawer 1
Clute, TX 77531

Sandel Corp.
P. O. Box 23
Westerville, OH 43081

Service Products, Inc.
57 North Westwood Avenue
Toledo, OH 43607

Shook & Fletcher Insulation Co.
P. O. Box 2957
Birmingham, AL 35212

Shook & Fletcher
112 W. 13th St.
Chattanooga, TN 37402
Attn: Penny Bloomer

Shook & Fletcher

Shook & Fletcher Insulation Co.
P. O. Box 7337
Western Dr. Meadow Warehouse
Mobile, AL 36607
Attn: Grace Thompson

Shook & Fletcher Marine Division
308 Krebs Avenue
P. O. Box 1363
Pascagoula, MS 39567

George L. Simonds Company
P. O. Drawer 32
Winter Haven, FL 33880
Attn: Roy Eggleston

Smith & Cassidy, Inc.
182 Donnelly Road
Box 749
Brandon, FL 33511
Attn: E. Smith

Smith-Sharpe Company
117-27th Avenue S. E.
Minneapolis, MN 55414
Attn: Lyman Moore

South Insulation Co.
433 Sadler St.
Montgomery, AL 36109
Attn: T. W. Woodard

Southwestern Insulation & Material
1912 N. Weller
Springfield, MO 65803
Attn: C. Flood (3)

Sprinkman Sons Corporation
12100 West Silver Spring Road
Milwaukee, WI 53225
Attn: John Locher
Bud Luken

Sprinkman Sons Corporation
1010 S. Washington Street
Peoria, IL 61602
Attn: Skip Carlton

Stafford Insulation Co.
Box 9337
Charleston, SC 29410
Attn: Joe Byron

Standard Asbestos Mfg. Company
P. O. Box 1105

Standard Asbestos Mfg. Company
401 N. Olive St.
Kansas City, MO 64120 (4)

Starr Davis Company
Box 584
Charlotte, NC 28201
Attn: Jim Fisher

Starr Davis Company
P. O. Box 19145
Greensboro, NC 27410
Attn: Dick Looman

State Insulation
525 Johnstone St.
Perth Amboy, NJ 08861

Stonaber, Inc.
2508 Fairway Park Drive
Houston, TX 77018
Attn: D. J. Brown

The Stovey Company
2360 59th Street
St. Louis, MO 63110
Attn: Walter Sidney

Styrothane, Inc.
P. O. Drawer GG
Freeport, TX 77541
Attn: Bill McCoy

Superior Sterling Company
P. O. Box 1599
Bluefield, WV 24701
Attn: William Poston

Syracuse Insulation Dist. Inc.
P. O. Box 338
Liverpool, NY 13088

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Taylor Insulation Company
1609 2nd Avenue
Moline, IL 61265
Attn: Jon Nelson

Thermal Acoustics
81 Farwell Avenue
W. Haven, CT 06516
Attn: Ken Ford

Thermal Products

Therm Tech Inc.
P. O. Box 22209
Houston, TX 77027
Attn: Wesley Smith

Thiessen Insulation Co.
P. O. Box 437
E. Moline, IL 61244
Attn: C. Edward Thiessen

P. S. Thorsen Company
45 L Street
S. Boston, MA 02127

C. E. Thurston & Sons
700 Dinwiddie Avenue
Richmond, VA

C. E. Thurston& Sons
P. O. Box 2411
Norfolk, VA 23501
Attn: P. B. Robbins

C. E. Thurston & Sons
Box 1481
Roanoke, VA 24007
Attn: Jack Owens

Three I Supply Company
P. O. Box 1884
Midland, MI 48640
Attn: D. Simpson

Topeka Insulation & Supply
2515 N. Topeka
Topeka, KS 66601

Triangle Insulation Company
R. R. 7 & Box 86
Paducah, KY 42001

Triple B. Corp.
P. O. Box 96119
Houston, TX 77015

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United Insulation Co.
817 N. Lewis Place
Tulsa, OK 74110

United Refactories
5597 Commercial Blvd.
Winter Haven, FL 33880

Universal Insulation Engineering Co

Universal Mfg. & Supply Co.
P. O. Box 751
Aiken, SC 29801

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Valley Insulation
2601 S. Kings Avenue
Box 1031
Brandon, FL 33511
Attn: V. Redford (2)

Vaughn Insulation Co.
2815 North 22nd Street
East Omaha, NB 68110
Attn: Charles Vaughn

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The W J Company
P. O. Box 142
1901 E. 4th St.
Sioux City, IA 51102
Attn: Don Wilber

Waco Insulation, Inc.
P. O. Box 24347
Richmond, VA 23224
Attn: E. G. Nippes

Waco Insulation of Tidewater, Inc.
23rd Street & Huntington Ave.
Newport News, VA 23607
Attn: W. McIntyre

Walker Jamar Co.
365 S. 1st Avenue East
Duluth, MN 55802
Attn: Walker Jamar

Wallace & Gale Company
2832 Maisel Street
Baltimore, MD 21230
Attn: B. Peltzer

Wayne Oakland Building Supplies
Div. Oakland Wholesale Inc.
25018 Plymouth Road
Detroit, MI 48239

Webco Insulating Co.
56 E. Chase St.
Pensacola, FL 32502
Attn: Dan Bragg

Wentz Insulation Company
2949 Cornhusker Highway
P. O. Box 30205
Lincoln, NB 68503
Attn: Stan Wentz

West Metal Works, Inc.
201 Dulton Avenue
Buffalo, NY 14211

Western State Insulation Company
P. O. Box 5332
Roanoke, VA 24102

Wilmington Supply
1275 Alameda Street
Wilmington, CA 90744
Attn: Roy Peterson

E. O. Wood Company
712 N. Beach
Ft. Worth, TX 76111

Worchester Industrial Insulations
42 Granite Street
Worcester, MA 01604

R. H. Wyatt Insulation Company
115 N. La Salle St.
Durham, NC 27705

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Young Insulation Company
P. O. Box 9187
Melrose Branch
Nashville, TN 37204
Attn: Bob Dean

Young Sales Corporation
195 Washington Avenue
Memphis, TN 38103
Attn: Mr. Joiner (3)

Young Sales Corporation
1054 Central Industrial Drive
St. Louis, MO 63110
Attn: J. S. Royer

The undersigned, D. S. Gibson, is Manager of Safety and Property Conservation for The Celotex Corporation and at present he has responsibility for plant safety. However, he has no personal knowledge of the facts set forth herein, since the present Celotex organization did not control the personnel and facilities involved at times relevant to this lawsuit, and further, such facts are the result of the investigation by attorneys on behalf of Celotex, and he affirms these Answers for purposes of taking necessary official action by The Celotex Corporation only.

THE CELOTEX CORPORATION
INDUSTRIAL PRODUCTS DIVISION

By _____
D. S. Gibson
Its Manager of Safety

State of Florida

County of Hillsborough

Before me the undersigned, a Notary Public in and for the County aforesaid, this day appeared D. S. Gibson, who stated he is authorized to execute the foregoing Answers and Objections to Interrogatories on behalf of The Celotex Corporation, and that the matters stated in said Answers are true and correct to the best of his knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME, this the 25th day of August, 1982.

_____
Notary Public in and for
State of Florida
County of Hillsborough

My commission expires: Notary Public State of Florida at Large My Commission Expires Jan. 10, 1986.

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for all parties with a copy of the within and foregoing, by depositing same in the United States Mail in properly addressed envelopes, with sufficient postage affixed thereto.

This 17th day of August, 1984.

John C. Edwards

Universal Mfg. & Supply Co.
P. O. Box 751
Aiken, SC 29801

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Valley Insulation
2601 S. Kings Avenue
Box 1031
Brandon, FL 33511
Attn: V. Redford (2)

Vaughn Insulation Co.
2815 North 22nd Street
East Omaha, NB 68110
Attn: Charles Vaughn

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The W J Company
P. O. Box 142
1901 E. 4th St.
Sioux City, IA 51102
Attn: Don Wilber

Waco Insulation, Inc.
P. O. Box 24347
Richmond, VA 23224
Attn: E. G. Nippes

Waco Insulation of Tidewater, Inc.
23rd Street & Huntington Ave.
Newport News, VA 23607
Attn: W. McIntyre

Walker Jamar Co.
365 S. 1st Avenue East
Duluth, MN 55802
Attn: Walker Jamar

Wallace & Gale Company
2832 Maisel Strcet
Baltimore, MD 21230
Attn: B. Peltzer

Wayne Oakland Building Supplies
Div. Oakland Wholesale Inc.
25018 Plymouth Road
Detroit, MI 48239

Webco Insulating Co.
56 E. Chase St.
Pensacola, FL 32502
Attn: Dan Bragg

Wentz Insulation Company
2949 Cornhusker Highway
P. O. Box 30205
Lincoln, NB 68503
Attn: Stan Wentz

West Metal Works, Inc.
201 Dulton Avenue
Buffalo, NY 14211

Western State Insulation Company
P. O. Box 5332
Roanoke, VA 24102

Wilmington Supply
1275 Alameda Street
Wilmington, CA 90744
Attn: Roy Peterson

E. O. Wood Company
712 N. Beach
Ft. Worth, TX 76111

Worchester Industrial Insulations
42 Granite Street
Worcester, MA 01604

R. H. Wyatt Insulation Company
115 N. La Salle St.
Durham, NC 27705

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Young Insulation Company
P. O. Box 9187
Melrose Branch
Nashville, TN 37204
Attn: Bob Dean

Young Sales Corporation
195 Washington Avenue
Memphis, TN 38103
Attn: Mr. Joiner (3)

Young Sales Corporation
1054 Central Industrial Drive
St. Louis, MO 63110
Attn: J. S. Royer