

IN THE CIRCUIT COURT FOR BALTIMORE CITY

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* ALL CT-1 CASES

* ALL CT-2 CASES

* ALL CT-4 CASES

* ALL CT-5 CASES

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DEFENDANT CELOTEX CORPORATION'S ANSWERS TO PLAINTIFFS'
MASTER INTERROGATORIES TO ALL DEFENDANTS

TO: All Defendants, to be answered individually and separately
by each Defendant.

Plaintiffs, by their attorneys, John T. Enoch, John
Amato, IV, and Goodman, Meagher & Enoch, request Defendants to
answer the following Interrogatories. The Interrogatories are to
be read and answered in accordance with the following
instructions and definitions.

a. These interrogatories are continuing in character and, in accordance with the Maryland Rules, you are required to supplement your answers promptly after you obtain further material information.

b. Where knowledge or information of a person is requested or possession or control by a person is inquired of, such request or inquiry includes knowledge, information, possession or control of or by the person's agents, representatives, and, unless privileged, the person's attorneys.

c. When the identity of a natural person is requested, the request or inquiry includes the home address, business address, and his former and present position or job title and business affiliation, and, if the person is a corporation or association, the address of its principal place of business.

d. When the identity of a document is requested, the request or inquiry includes the type or title of the document, its date, its author, and its present custodian. In lieu of identifying any document, a copy may be annexed to the answers to these interrogatories. The term document shall be read to include any paper, graphic material, film, tape, disc, recorded matter, or stored computer data.

e. As used herein, the terms "you" and "your" refer to the defendant corporation answering these interrogatories, its predecessors, parents, subsidiaries and affiliates, if any, its

present and former officers, executives, directors, agents and employees, and all other persons acting or purporting to act on behalf of Defendant.

f. Present tense should be construed as also including the past tense where appropriate.

g. The singular should be construed as also including the plural and the plural should be construed as also including the singular where appropriate.

h. If you are unable to answer any of these interrogatories completely, answer to the extent possible, specifically, and state whatever information or knowledge you have concerning the unanswered.

i. As used herein, "asbestos products" and "asbestos-containing products" are inclusive terms, used interchangeably, and include, but are not limited to: asbestos, raw asbestos, mined asbestos, milled asbestos, asbestos compounds, material and products containing asbestos and the asbestos particles, dust and fibers resulting therefrom.

PRELIMINARY STATEMENT

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 industrial insulation products. Celotex's involvement in the industrial asbestos insulation business began with its purchase of Panacon Corp. in 1972. Prior to that date, Celotex did not have any interest in the industrial asbestos insulation field.

Most 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 information 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.

To the extent that the information contained herein differs in any respect from any prior response to discovery, these answers shall be deemed to update and supersede such prior answer in any and all cases.

Celotex does not concede that any of its responses to these Interrogatories are or will be admissible evidence at a trial of this action and Celotex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

PRELIMINARY OBJECTION

Defendant, The Celotex Corporation, objects generally to Plaintiff's definitions of "you", and "your", as it is vague and overbroad and Defendant is unable to formulate the correct response. In an attempt to be cooperative, this Defendant, The Celotex Corporation, has prepared the following responses which are limited to information pertaining to The Celotex Corporation and its predecessor-in-business. These are uniform preliminary matters that precede responses to any discovery on a national basis.

PART I - GENERAL INTERROGATORIES

Interrogatory No.1: State the name, address and official capacity of each person who has supplied information used in answering these interrogatories and indicate for which interrogatory each such person is responsible.

Response No. 1: It is impossible for Defendant to respond to these questions with specificity, as various persons and various documents from many departments are/were consulted in answering these Interrogatories.

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 agent of the Corporation, and not on the basis of his personal knowledge of the facts stated herein.

Interrogatory No. 2: (2) Identify each document that was examined, reviewed and/or used in answering each interrogatory, specify the interrogatory and identify the present custodian of each document.

Response No. 2: Defendant objects generally to Plaintiff's Interrogatories which are unnecessarily broad and which would be unduly burdensome, expensive and oppressive for Defendant to answer in the manner requested. The documents reviewed and consulted in connection with the preparation of answers to these Interrogatories are far too voluminous and cover too large a period of time to expeditiously identify with the specificity requested. Moreover, the type of document identification requested is unnecessary, unreasonable, and would be literally impossible to render for many of the answers supplied. Furthermore, the party serving these Interrogatories will be given reasonable opportunity to inspect the records and make copies, compilation, abstracts or summaries of these records pursuant to Maryland Rule 2-421, because the burden of ascertaining the documents which contain responsive information is substantially the same for the parties serving these Interrogatories as for this Defendant.

Interrogatory No. 3: State whether you are a corporation. If so, state: your corporate name; state of incorporation; date of incorporation; address of principal place of business; address(es) of any other place of business; whether, if you are a "foreign corporation" as defined in Maryland General Corporation Law Sec. 1-101(1), you are now or have ever been registered or qualified to do business in the State of Maryland; and the corporate name, state of incorporation and date of incorporation of any subsidiary, predecessor or affiliate corporation.

Response No. 3:

Yes.

- a) The Celotex Corporation.
- b) Delaware.
- c) The Celotex Corporation was re-incorporated on August 6, 1964.
- d) 1500 N. Dale Mabry Highway, Tampa, Florida, 33607.
- e) Manufacturing facilities which produced asbestos-containing industrial insulation materials, which are relevant to this litigation, are or were located at the following locations: Lockland, Ohio, 1906 to 2/70 (high temperature industrial insulation); 2/70 to 1984 (other miscellaneous and encapsulated products;
Plymouth Meeting, Pennsylvania, 1906 through 1962 (high temperature insulation products only);
Linden, New Jersey, 1969 through 10/83 (asbestos paper products).
- f) Yes. Qualified to do business in the State of Maryland on November 3, 1977.

Also, see Response No. 5.

Interrogatory No. 4:
you have existed.

(4) Identify all prior names by which

Response No. 4: Refer to Corporate History attached, marked Exhibit "A". Also, refer to Response No. 5 below. Since Celotex has assumed all ordinary liabilities of its predecessors, further response is irrelevant. Celotex has specifically not assumed any responsibility for punitive liabilities of its predecessors-in-business.

Interrogatory No. 5: If you have divisions which have ever mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce asbestos products, identify each such division and state the names, addresses and job titles of each person who supervised each division, specifying the applicable time periods.

Response No. 5: Due to the record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond in full as requested. However, the Defendant is able to provide the following responsive information. Refer to Response #4 above. In addition, The Celotex Corporation manufactured, sold and distributed some asbestos-containing industrial insulation products until 1984. Its predecessors-in-business manufactured, sold, and distributed a variety of asbestos-containing products from 1906 until 1972. Defendant, The Celotex Corporation, has three divisions: the Building Product Division, Industrial Product Division; and Roofing Product Division.

In addition, Carey Canada Inc. (formerly known as Carey-Canadian Mines, Ltd.) was incorporated in the dominion of Canada on February 14, 1955. This Corporation was an independent wholly-owned subsidiary of Celotex's predecessor in business and

has been an independent wholly-owned subsidiary of The Celotex Corporation since 1972. Defendant declines to respond further on behalf of a separate, independent entity.

Interrogatory No. 6: Have you controlled, purchased or in any way acquired any interest in any corporation or business entity which mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce asbestos products?

Response No. 6: Refer to Response #4 and #5 above. In addition, neither Celotex nor its predecessors-in-business mined raw asbestos. However, Carey Canada, Inc. was engaged in the mining and milling of raw chrysotile asbestos fibers from 1958 until April, 1986. All sales of the raw asbestos fibers took place in Canada.

Interrogatory No. 7: If your Answer to Interrogatory No. 6 is in the affirmative, identify and attach copies of all documents related thereto and state:

(a) The name(s), including prior name(s), and the business address(es) of any and all such corporation(s) or business entity(ies);

(b) The date(s) on which you first controlled, purchased or acquired said interest;

(c) The manner in which you acquired said interest, i.e., cash purchase, merger, consolidation, exchange or sale of assets, etcetera;

(d) The percentage of assets, ownership and/or control acquired by you;

(e) Whether the corporation(s) or business entity(ies) acquired by you continued to exist following the acquisition and, if not, the date on which its existence ceased;

(f) The nature of and/or amount of consideration paid by you for said interest;

(g) The terms and conditions of any contracts or agreements by and between you and such corporation(s) or business entity(ies), including, but not limited to, the terms and conditions relating to the transfer of liabilities for obligations of such corporation(s) or business entity(ies);

(h) Whether you continued the manufacture, sale and/or distribution of such corporation's or business entity's asbestos products and, if so, whether you used the same product name(s) in so doing; and

(i) Whether there was an identity of name, officers, directors, personnel, property, suppliers, distribution outlets and/or clients between you and such corporation(s) or business entity(ies);

Response No. 7: Defendant objects generally to Plaintiffs' Interrogatory as vague, overbroad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. In an attempt to be responsive without waiving its objection, Defendant refers to Response #5 and #6 above.

Interrogatory No. 8: If you have directly or indirectly mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce asbestos or asbestos-containing products, state as to each such product, indicating separately those products dealt with by you, your predecessor(s) in interest, your subsidiary(ies), and your affiliate(s), if any, the following:

(a) Brand name, trade-name, and/or trade-mark;

(b) The generic name or identity;

(c) Description, including size, shape, color and composition, i.e. solid, powder or other form;

(d) Chemical and physical composition, including, but not limited to, the percentage of asbestos by weight and volume;

(e) Type of asbestos, i.e. chrysotile, amosite, crocidolite, actinolite, anthophyllite, or tremolite, indicating the percentage of each such asbestos fiber by weight and volume;

(f) Intended marketable use; and

(g) Dates during which each asbestos product was mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce.

Response No. 8: Defendant objects to responding on behalf of subsidiaries or affiliates which are separate, independent entities. Further, as to this Defendant and its predecessors-in-business, Defendant objects to providing a description of the intended uses of each such product on the grounds that this request is overbroad and unduly burdensome. Likewise, the Defendant objects to providing a description of the physical characteristics of each such product on the grounds that this request is overly broad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information. Moreover, Defendant objects generally to Plaintiff's Interrogatories as vague, overbroad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence, insofar as they relate or refer to unidentified asbestos products and materials. Asbestos fiber has over 3,000 uses and is found in a wide variety of products and forms, including floor tiles, wallboards, ceiling tiles, gloves, roofing felts, protective matting, gaskets, automotive brakes, machine and pipe insulation, etc. Defendant may not reasonably be required to delineate its product characteristics until Plaintiff has fully disclosed the basis upon which he claims Defendant's products caused him injury.

In an attempt to be responsive without waiving its objections, Defendant states: (A-D, G) The Celotex Corporation manufactured, sold and distributed some asbestos-containing industrial insulation products until 1984. Its predecessors-in-business manufactured, sold, and distributed a variety of asbestos-containing products from 1906 until 1972. Attached is a list, marked Exhibit "B", of asbestos-containing insulation/industrial products manufactured and distributed by The Celotex Corporation and/or its predecessors-in-business, including the percentage of asbestos in each product.

(E) The asbestos contained in the products previously identified in Exhibit B was chrysotile asbestos fiber with the following exceptions:

1) Tempcheck, Hightemp (#12, 15 & 19) and A-101 Cement contained amosite and chrysotile;

2) Careytemp 2000 and Thermalite contained amosite only;

3) Two types of millboard, made until 1973, utilized crocidolite in a mixture with chrysotile fibers; and

4) In addition, 85% Magnesia and Super Light 85% Magnesia for an undetermined period in or about 1946 may have contained some amosite due to a material shortage.

(F) Refer to above objections.

Interrogatory No. 9: State whether you presently mine, manufacture, produce, fabricate, import, convert, compound, process, sell, merchandise, supply, distribute and/or otherwise place in the stream of commerce any asbestos product(s) listed in your Answer to the preceding interrogatory.

Response No. 9: Neither Celotex nor its predecessors-in-business mined raw asbestos. The Celotex Corporation manufactured, sold and distributed some asbestos-containing industrial insulation products until 1984. Its predecessors-in-business manufactured, sold, and distributed a variety of asbestos-containing products from 1906 until 1972. Products were discontinued due to lack of demand and/or technological advancements and improvements.

Interrogatory No. 10: Identify each individual who participated in the design and preparation of manufacturing specifications for each asbestos product identified in your Answer to Interrogatory No. 8.

Response No. 10: Defendant objects generally to Plaintiff's Interrogatory as overbroad, unduly burdensome and speculative, insofar as they relate to the details of various actions which allegedly occurred between 10 and 80 years ago. Detailed information from this time frame is manifestly unreliable and in most cases amounts to speculation and conjecture, which has no probative value. Defendant objects to this Interrogatory as it is vague, overbroad and unduly burdensome. Without waiving its objection Defendant states that numerous employees were involved in product design and specifications. Due to the record retention policy and for the reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. However, the most knowledgeable person in this area would be Arthur P. Mueller, retired Manager of Design and Engineering of Industrial Products, 320 S. Wayne Avenue, Lockland, OH 45215.

Interrogatory No. 11: State whether any written memoranda, specifications, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the asbestos products identified in your Answer to Interrogatory No. 8. If so, identify:

(a) Each such written material or document; and

(b) The custodian, identity and location of each written material or document.

Response No. 11: Defendant objects to this Interrogatory as irrelevant, overbroad and unduly burdensome. Without waiving this objection, in an attempt to be responsive, Defendant states that products specifications and batch formulae for asbestos-containing insulation products of predecessors-in-business are located at Defendant's manufacturing facility in Lockland, Ohio. Due to record retention policies, Defendant cannot verify that these records are complete. These documents will be made available for inspection upon proper notice to all parties.

Interrogatory No. 12: Identify, by location and product, each plant of your in which the asbestos products identified in your Answer to Interrogatory No. 8 have been manufactured and/or assembled and the dates said plants have been in operation.

Response No. 12: The Celotex Corporation and its predecessors-in-business have operated manufacturing facilities, which produced asbestos-containing industrial insulation materials, at the following locations:

Lockland, Ohio - 1906 to 2/70 (high temperature industrial insulation); 2/70 to 1984 (other miscellaneous and encapsulated products);

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

Linden, New Jersey - 1969 through 10/83 (asbestos
paper products).

Interrogatory No. 13: If you have discontinued mining, manufacturing, producing, fabricating, importing, converting, compounding, processing, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce any asbestos products listed in your Answer to Interrogatory No. 8, identify the products discontinued, give the date of discontinuance and specify the reason(s) for such discontinuance.

Response No. 13: Neither Celotex nor its predecessors-in-business mined raw asbestos. As to asbestos-containing products, due to record retention policy, Defendant does not have complete records of its predecessors-in-business. Products were discontinued due to lack of demand and/or technological advancement and improvements.

Refer to Product List attached, marked Exhibit "B" for dates of manufacture.

Interrogatory No. 14: If you have done so, when did you first determine that any other material could be used in place of asbestos for high-temperature insulation or any other use to or for which asbestos has been applied. If you have, in fact, substituted other material(s) for asbestos in your product(s), then state:

(a) The identity of such substituted material(s);

(b) When the product(s) with such substituted material(s) was first marketed; and

(c) The tradename(s) and brand name(s) of the product(s) marketed with such substituted material(s).

Response No. 14: 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.

Interrogatory No. 15: State whether you have ever made any changes to or alterations of your asbestos products from 1930 to the present. If so, state:

(a) The identity, by brand name and tradename, of each such product;

(b) The date(s) each such product was changed or altered;

(c) The manner in which each such product was changed or altered, including, but not limited to, any changes in the asbestos content or chemical composition of each such product;

(d) The reason for each change or alteration; and

(e) The identity of the person(s) responsible for instituting each change or alteration.

Response No. 15: In approximately 1960, Celotex's predecessors-in-business developed premolded high-temperature insulation products. These products did not require cutting, sawing or grinding. Celotex continued to manufacture premolded insulation. All of the high-temperature insulation products manufactured by Celotex were asbestos-free, or manufactured in a non-dust producing form. Also, refer to Response #14 above.

Interrogatory No. 16: Do you contend that any of the asbestos products listed in your Answer to Interrogatory No. 8 require change or modification before they may be used? If so, specify what change or modification is required for each such product.

Response No. 16: Defendant objects to this interrogatory on the ground that "change" and "modification" are terms which are susceptible to several meanings. Moreover, Defendant is unable to respond as such products were generally sold to distributors and sophisticated vendees, and Defendant has no way of knowing what, if any, changes or modifications were made.

Interrogatory No. 17: Identify all patents issued, or any applications made therefor, for any asbestos product listed in your Answer to Interrogatory No. 8. Specify the number of each patent, the date(s) of application, issuance and renewal, if applicable, to whom each patent was issued and the product(s) for which each patent was issued.

Response No. 17:

ASBESTOS FIBER
PIPE INSULATION PATENTS

<u>Patent Number</u>	<u>Date</u>
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

Interrogatory No. 18: Identify all trademarks registered for any products listed in your Answer to Interrogatory No. 8. Specify the number and date of registration, the term thereof, the date(s) of renewal, if applicable, by whom each trade-mark was registered and the product(s) for which each trade-mark was registered.

Response No. 18: Refer to Responses to Request for Production #6.

Interrogatory No. 19: State whether you have distributed or sold any asbestos or asbestos-containing products which was/were mined, manufactured, produced, fabricated, imported, converted, compounded, processed, sold, merchandised, supplied and/or otherwise placed in the stream of commerce by persons and/or business entities other than you or your predecessor(s) in interest or subsidiary(ies), if any. If so, state:

(a) The identity of each such person and/or business entity whose asbestos products you sold or distributed on a product-by-product basis;

(b) The terms of all assignments, agreements, licenses and other arrangements which relate to same. Identify and attach copies of all such documents;

(c) As to each product, the brand name, tradename and/or trademark adopted and used by the source from which you obtained said product for distribution or sale;

(d) As to each product, the brand name, tradename and/or trademark adopted and used by you for purposes of distribution or sale of said product;

(e) The generic name or identity of each such product;

(f) The dates during which you distributed or sold each such asbestos product;

(g) As to each such product, a description, including size, shape, color, composition, i.e., solid, powder or other form;

(h) As to each such product, the type of asbestos and the percentage of asbestos, by weight and volume;

(i) As to each such product, its intended marketable use;

(j) The identity of each person and/or business entity in the State of Maryland to whom or to which you sold or distributed each such product;

(k) The identity of each contractor, subcontractor, installer or other business in the State of Maryland which ultimately installed, applied or used each such product; and

(1) The custodian, identity and location of each document which refers to or contains information relevant to such sale or distribution.

Response No. 19: Defendant objects to responding on behalf of subsidiaries which are separate, independent entities. As to this Defendant, neither Celotex nor its predecessors-in-business mined raw asbestos. Also, Defendant objects to providing a description of the intended uses of each such product on the grounds that this request is overbroad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information.

Without waiving its objections, in an attempt to be responsive Defendant states:

(A), (C), (E), (F) A small amount of calcium silicate pipe and block insulation is believed to have been purchased by the Philip Carey Manufacturing Company from Baldwin-Ehret-Hill (or its successor Keene Corp.) for a few years in the late 1950's and early 1960's, and relabeled "Carey Calcium Silicate". Also during this time frame, predecessors may have purchased a small amount of this product from PABCO (now Fibreboard), and may have purchased a minimal amount of asbestos products from Eagle-Picher.

In 1968, after a semi-halt in 1967, Defendant's predecessor stopped manufacturing MW-50 cement; thereafter, Defendant sold this product after purchasing it from Keene Corp., Forty-Eight Insulations, Santaler Bros. and Eagle-Picher. The product purchased from Keene Corp. was known as "Super Power

House Cement", and was sold until about 1977. It is not known if Defendant or predecessors-in-business relabeled MW-50 prior to resale.

(B) Celotex's predecessors-in-business issued a license to B & B Engineering Company of Houston, Texas, under its patent number 2884380 to manufacture the following product:

- a) Careytemp.
- b) The period of the license agreement was November 24, 1959, through April 22, 1976.
- c) The license was not exclusive.
- d) Although we do not have complete records of our predecessors-in-business, it is believed that there was no agreement concerning liability for third party claims.

(D) Between 1956-1965 predecessors-in-business may have sold a small quantity of some asbestos-containing products to Eagle-Picher. It is believed that a minimal amount of All-Temp and Careytemp was sold in this time frame, and relabeled "Hy-Lo" by Eagle-Picher.

(G) Defendant objects to providing a description of each such product on the grounds that this request is overbroad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information.

(H) Refer to Response #8 above.

(I) Defendant objects to providing the intended marketable use of each such product on the grounds that this request is overbroad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information.

(J) Refer to Response #19 (L) below.

(L) Defendant is unable to respond as requested for the following reasons: Celotex and predecessors-in-business were engaged in highly diversified businesses in which asbestos-containing insulation sales constituted a minimum of the business. Accordingly, available invoices reflecting general sales are predominantly comprised of non-asbestos products. Sales invoices may contain sales of both asbestos-containing products and non-asbestos-containing products. There are no separate invoices available which itemize only asbestos-containing products. In addition, sales invoice records are not available prior to 1967.

Celotex has a limited number of invoices of predecessors-in-business dating back to 1967. These invoice records are likewise not segregated into asbestos products and non-asbestos products. Also, many 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 Lockland, Ohio.

Sales records, dating from 9/1/72 are maintained by Celotex in Tampa, Florida. Sales invoices from September 1, 1974 can be retrieved by the Billing Department; however, a manual search must be made which involves the following procedures:

1. Manual search of all books of customer listings from 1974 through 1983 to obtain customer I.D. number.
2. Utilize customer I.D. number, a manual search of all monthly books of invoice number listings to locate the individual invoice number. There are approximately (20,000) sales invoices generated during an average month within a given year. (Note that sales invoices are not distinguished from invoices that may reflect credit memos, remittance differences, stock transfers or freight charges).
3. Utilizing individual invoice number, a manual search to determine a particular location of stored invoice by box number. (Maintained in a record retention log which lists individual invoice numbers and corresponding box numbers).
4. Pulling each individual invoice manually. (Invoices are stored in a separate warehouse).
5. Reviewing each invoice to determine whether the sale was of asbestos-containing products or general non-asbestos sales. (Note the vast majority of sales did not involve asbestos-containing products).

A group of invoices, from April, 1974 through August, 1974, are in chronological order only. There is no index or method of sales information retrieval from these records other than by a manual review of each document.

Defendant will make these records available for inspection at their respective locations upon proper notice to all necessary parties.

Interrogatory No. 20: Identify the distributors of your asbestos products at any time during the period from 1930 to the present and attach copies of all documents relating to said distributors. For each distributor, indicate:

(a) The terms of all assignments, agreements, licenses and other arrangements by and between you and said distributor;

(b) Whether the distribution relationship was exclusive;

(c) The year or years in which the distribution relationship was in effect;

(d) The identity of your asbestos products which the distributor was authorized to and did distribute; and

(e) The quantity of your asbestos products distributed by the distributor on a year-by-year and product-by-product basis.

Response No. 20: Defendant objects to the Interrogatory as vague, overbroad and unduly burdensome. Without waiving this objection, in an attempt to be responsive, Defendant states due to the time period involved, Defendant is unable to respond with absolute accuracy. The best information presently available is indicated on the attached exhibit(s). Attached and marked Exhibit "C" is a list of Philip Carey distributors and sales offices from 1927 - 1972. Attached and marked Exhibit "D" is a

list of other distributors and sales offices handling Philip Carey products form 1927 - 1952. For a list of Defendant's recent distributors/contractors, please refer to the attached, marked Exhibit "E". Defendant has no documents regarding such distributors. For information regarding volume and type of product, Defendant suggests you contact the appropriate distributors. Refer also to Response #19(L) above.

Interrogatory No. 21: State whether you have ever sold, distributed or otherwise furnished any of your asbestos products to any other person and/or business entity for resale or redistribution at any time from 1930 to the present. If so, state:

(a) The identity of each such person and/or business entity;

(b) The brand name, tradename and/or trademark adopted and used by you for each such product;

(c) The brand name, tradename and/or trademark adopted and used by each such person and/or business entity for each such product;

(d) The generic name or identity of each such product;

(e) The year(s) in which each such product was sold, distributed or otherwise furnished to each such person and/or business entity, and for each year, the quantity of each product sold, distributed or otherwise furnished;

(f) The intended marketable use for each such product;

(g) Whether each such product was intended to be used, resold, or distributed by such other person and/or business entity in the same or substantially the same condition as it was when shipped or delivered by you; and

(h) The custodian, identity and location of all documents pertaining to agreements for the resale, distribution, or furnishing of your asbestos products to each other person and/or business entity.

Response No. 21: Defendant objects to the repetitive nature of this Interrogatory and refers to Response #19 (D) and #20 above.

Interrogatory No. 22: State the following with respect to the packages and containers in which you sold, distributed or otherwise furnished each of the asbestos products described in your Answer to Interrogatory Nos. 8 and 19 on a year-by-year and product-by-product basis;

(a) A description of the package or container in which each product was sold, distributed or otherwise furnished, including composition, size, shape and color;

(b) A description of the markings or printed material that appeared on each package or container, indicating the size and color of the same;

(c) A description of any logo or other design appearing on the package or container;

(d) A verbatim description of any caution or warning notice appearing on the package or container, setting forth the year(s) in which each such notice appeared on each such product; and

(e) A verbatim description of any instructions appearing on the package or container.

Response No. 22: Defendant objects to providing the requested information for each such product on the ground that this request is overbroad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information. Without waiving its objection, Defendant states that due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. In an attempt to be responsive regarding Defendant's and/or predecessors-in-business asbestos-containing products generally, Defendant responds as follows:

(A) Defendant's industrial insulation products were shipped in bags, boxes, crates and gallon drums.

(B-E) 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

This warning also appeared in the sales literature brochures of Celotex in 1974. The above warning was revised, and the following warnings were used by The Celotex Corporation from 1976 to early 1979:

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

CAUTION -- These products contain asbestos fiber, and any working area where packages are opened, materials being cut or mixed, or handled in any way, should be inspected in accord with applicable regulations of the U.S. Occupational Safety and Health Agency (OSHA). These regulations may

require special ventilation equipment, or the wearing of approved protective masks. OSHA has found asbestos fibers to be a health hazard, if repeatedly inhaled, which may cause diseases including cancer and asbestosis of the lungs. (OSHA standards are published in Volume 30, Code of Federal Regulations, Part 1910 and your supplier can obtain guidance from Celotex, if needed.)

These warnings appeared on printed labels as well as in sales literature brochures. In July, 1979, Celotex 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

(G) Refer also to Request for Production Response

#6.

Interrogatory No. 23: If your Answer to Interrogatory No. 22 reflects that any changes were made to the packages and containers in which you sold, distributed or otherwise furnished each of the asbestos products described in your Answer to Interrogatory Nos. 8 and 19, indicate as to each such package or container:

(a) The nature of each such change, e.g., changes in composition, size, shape and color, and/or changes regarding the placement, modification or removal of any color, logo, design, name, word, number, instruction, warning or other marking on the container;

(b) The date on which you decided to make the change;

(c) The date the container was in fact changed;

(d) The reason for the change;

(e) The identity of each present or former employee, officer, representative or agent of yours at any time from 1930 to the present with knowledge or information regarding your decision to change any aspect of the package or container; and

(f) The custodian, location and identity of each document in your custody, control or possession which contains information relevant to your decision to change any aspect of the package or container.

Response No. 23: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Our best information indicates that packages were purchased from Container Corporation of America, 9960 Alliance Road, Cincinnati, Ohio, and Inland Container Corporation, 912 Nelbar Street, Middletown, Ohio. These companies should be contacted for further information. Additionally, Defendant is unable to respond as such products were generally sold to distributors and sophisticated vendees, and Defendant has no way of knowing what, if any, changes were made.

Interrogatory No. 24: For each asbestos product identified in your Answer to Interrogatory Nos. 8 and 19, as being manufactured, sold, distributed or otherwise furnished by you, state:

(a) Whether you have actual packages or containers or photographs of packages or containers in which said products were sold, distributed or otherwise furnished; and

(b) The identity of the custodian of said packages or containers or photographs thereof.

Response No. 24: (A) As to actual containers, no. However, Defendant has in its possession reproductions of actual photographs of some of predecessors' products. Also, products literature brochures contain reproductions of actual photographs.

Our best information indicates that packages were purchased from Container Corporation of America, 9960 Alliance Road, Cincinnati, Ohio, and Inland Container Corporation, 912 Nelbar Street, Middletown, Ohio. These companies should be contacted for further information.

(B) The above-mentioned are in the custody of the Legal Department, The Celotex Corporation located at 1500 N. Dale Mabry Highway, Tampa, FL 33607.

Interrogatory No. 25: State whether you prepared or published any catalogues, brochures or other documents describing products containing asbestos or asbestos components. If so, identify each such catalogue, brochure or other document and the custodian thereof.

Response No. 25: 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 1970's. Brochures do not exist for each year inclusively.

Interrogatory No. 26: Identify each present or former employee, officer, agent or representative of yours who directed, handled, solicited, supervised, promoted or otherwise participated in the sale, supply, distribution, delivery, installation or removal in Maryland, at any time from 1930 to the present, of any asbestos products identified in your Answer to Interrogatory Nos. 8 and 19.

Response No. 26: Defendant objects that this Interrogatory is vague, misleading, overbroad and ill-defined. Without waiving its objections, Defendant states that due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested.

Interrogatory No. 27: For each person identified in your Answer to Interrogatory No. 26 who participated in the advertising in Maryland of any asbestos products identified in Interrogatory Nos. 8 and 19 at any time from 1930 to the present, state:

(a) His or her duties, responsibilities and inclusive years of employment;

(b) The identity of each product advertised, marketed or promoted; and

(c) The method by which each product was advertised, marketed or promoted, and if by print, the name of the publication, the inclusive dates during which the advertisement or promotion appeared therein and the publisher.

Response No. 27: Refer to Response #15 above. In an attempt to be responsive as to Defendant's and/or predecessors-in-business asbestos-containing products in general, Defendant states that from 1974 - 1982, Celotex retained the Mike Sloan Advertising Agency, 101 S.W. 15th Road, Miami, Florida. Such matters are currently handled internally by the Advertising Department of The Celotex Corporation.

All of Celotex's advertising contains warnings that comply with OSHA and other governmental regulations.

Magazines and trade publications which advertised Philip Carey products are as follows:

1. Sweet's Catalogues
2. Asbestos

3. Power
4. Plant Engineering
5. Pulp & Paper
6. Petroleum Age
7. Chemical Engineering News
8. Iron Age
9. Chemical Processing
10. Industrial Research & Development
11. Paper Age
12. Chemical Industry & Product News
13. Air Conditioning, Heating & Refrigeration
News
14. Industrial Equipment News
15. Power Engineering
16. Product Design and Development
17. Pacific Marine Review

Celotex has no advertising copy and no additional information regarding advertising of predecessor's asbestos products. Refer also to Response #25 above.

Interrogatory No. 28: Describe your corporate structure and policy concerning the subject of employee safety in the design, development, manufacture, testing and use of asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 from 1930 to the present. In your Answer to this Interrogatory, identify each present or former corporate department, division, subdivision or other group responsible for the above-described activities and, with respect to each, identify the name, title, duties, responsibilities, and current or last known business and residential address of the highest supervisory employee with knowledge of any of those activities during any time from 1930 to the present.

Response No. 28: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as Plaintiffs were not employees of this Defendant. Defendant further objects to this Interrogatory as overbroad and unduly burdensome in that the Plaintiff seeks information for a 56 year time period. Without waiving its objections, Defendant states relevant asbestos products were generally sold to insulation

application contractors, who carried the main burden of responsibility for safety on the job. Defendant had no jurisdiction over such workers nor any right to inspect such job sites. However, Defendant's predecessors-in-business have had Managers of Safety & Property Conservation responsible for in-plant safety programs. The present Manager of Safety & Property Conservation is D.S. Gibson. Various safety booklets and bulletins have periodically been distributed to employees. Plant safety bulletins such as those marked Exhibit "J" date back at least to 1944. Further, various safety booklets and bulletins have periodically been distributed to employees. In addition, Celotex and its predecessors-in-business have instituted in-plant safety programs.

Interrogatory No. 29: Describe your corporate structure concerning the subject of research and development of asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 from 1930 to the present. In your Answer to this Interrogatory, identify each present or former corporate department, division, subdivision or other group responsible for any of these activities and, with respect to each, identify the name, title, duties, responsibilities, and current or last known business and residential address of the highest supervisory employee during any time from 1930 to the present.

Response No. 29: Defendant objects to the form of this Interrogatory, in that it is vague, misleading, overbroad and ill-defined. Without waiving its objection, Defendant states that 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. From 1972 to 1982, Celotex owned a subsidiary whose primary function was the research and development of new products and processes.

Interrogatory No. 30: Describe your corporate structure concerning medical directors, industrial hygienists or consultants in these fields from 1930 to the present. In your Answer to this Interrogatory, identify the name, title, duties, responsibilities, period of employment, to whom the individual reported, and the current or last known business and residential address of each medical director, industrial hygienist or consultant of yours, or of your predecessor(s) in interest or subsidiary(ies), if any.

Response No. 30: Defendant objects to responding on behalf of subsidiaries which are separate, independent entities. As to this Defendant and its predecessors-in-business, Defendant objects that this Interrogatory is vague, misleading, overly broad, and ill-defined. Without waiving its objection, Defendant states neither Celotex nor its predecessors-in-business had a person employed as a medical officer or director. For a period of one year ending in 1963, a predecessor-in-business retained Dr. Thomas Mancuso as a Consulting Medical Director, 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 physicians were at some time employed or retained by predecessors-in-business. Those doctors were:

Dr. Virgil A. Plessinger
2700 Central Trust Tower
Cincinnati, OH

Dr. C. G. Ruehlman
83 South Eagle Road
Hebrewtown, PA

Dr. Robert G. Loudon
address unknown

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. Eagle, 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.

Interrogatory No. 31: Identify any medical examination program offered or sponsored by you or your insurance carrier, from 1930 to the present, for employees handling or otherwise exposed to asbestos and/or asbestos products. With respect to each such program, indicating applicable time periods, state:

(a) The manner of communicating with employees about such program;

(b) Whether examination was optional or mandatory and, if the latter, how frequently such examination was required;

(c) What percentage of employees permitted to undergo such examination actually participated;

(d) What percentage of employees who underwent such medical examination were found to have pneumoconiosis, asbestosis, mesothelioma, lung cancer or other cancers; and

(e) With respect to the employees referred to in your Answer to Part (d) of this Interrogatory, what percentage of these employees were paid disability, and/or worker's compensation benefits and for what percentage of employees were medical expenses paid for purposes of treatment of such condition.

Response No. 31: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as Plaintiffs were not employees of this Defendant. In an attempt to be responsive without waiving its objection, Defendant states Celotex is informed and believes that Philip Carey Manufacturing Company first offered chest x-rays to its employees in some plants as early as 1950. Also, its employees were informed when the x-ray unit, sponsored by the Anti-Tuberculosis League, was in the area and were encouraged to undergo x-ray examinations since approximately 1965. Since 1972, The Celotex Corporation has provided comprehensive medical examinations on an annual basis for its employees working with asbestos, including chest x-rays and pulmonary function tests. Professional Health Services, Inc., performed these medical examinations from 1972-1977. Hearex Corporation performed the examinations from 1978 until early 1982, and since that time Medi-Systems has been retained

for these functions. Additionally, Defendant does not maintain such data in the ordinary course of business and is unable to respond as requested.

Interrogatory No. 32: State whether you or anyone on your behalf ever conducted, engaged in or participated in any tests, studies and/or research concerning the human health consequences of persons coming in contact with and/or inhaling asbestos fibers or asbestos dust during the manufacture and/or use of asbestos products. If so, identify:

(a) What tests, studies and/or research were done;

(b) When said tests, studies and/or research were done;

(c) The individuals who ordered and supervised the tests, studies and/or research;

(d) The individuals or groups engaged in or participating in the tests, studies and/or research;

(e) The substance of any recommendations and/or suggestions given as a result of the tests, studies or research. State when, by whom and to whom said recommendations were made, including the addresses of these individuals;

(f) All written documents including, but not limited to, reports, memoranda, specifications and correspondence which refer, relate or pertain to said tests, studies and/or research; and

(g) The present custodian of the written documents identified in your Answer to Part (f) of this Interrogatory.

Response No. 32: Celotex's predecessor-in-business was 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, Indiana, by John Kehoe, Chemical Engineer, Indiana State Board of Health, 1330 W. Michigan Street, Indianapolis, Indiana. Attached and marked Exhibit "F" is a letter from Albert Edwards, Industrial Hygiene Engineer, to F.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 "G", dated January 2, 1968, addressed to Art Mueller and authorized 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.

Interrogatory No. 33: State whether any of the medical directors, industrial hygienists or consultants in these fields identified in your Answer to Interrogatory No. 30 ever made any recommendations and/or suggestions to you pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products. If so, identify:

(a) The date when said recommendations and/or suggestions were made;

(b) The individual to whom said recommendations and/or suggestions were made;

(c) The individual who made said recommendations and/or suggestions;

(d) The substance of the recommendations and/or suggestions; and

(e) What actions, if any, were taken by you as a result of said recommendations and/or suggestions.

Response No. 33: Defendant object to the form of this Interrogatory, in that the terms "risks or hazards to persons involved in the manufacture or use of asbestos products" are vague, misleading, overbroad and ill-defined. Without waiving its objection, Defendant states that due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. In an attempt to be responsive, Defendant refers to the attached reports from Dr. Mancuso date May 23, 1963 and

August 15, 1963, marked Exhibit "H". Refer also to the Preliminary Industrial Hygiene Survey attached, marked Exhibit "I".

Interrogatory No. 34: State whether you have ever conducted or directed any studies to determine the amount of asbestos dust in your asbestos product manufacturing facilities. If so, identify:

- (a) The date of each such study;
- (b) The individual or group conducting each such study;
- (c) The result or conclusion of each such study;
- (d) All documents which refer, relate or pertain to each such study; and
- (e) The present custodian of all documents identified in your Answer to Part (d) of this Interrogatory.

Response No. 34: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as Plaintiff was not employed in Defendant's manufacturing facilities. Without waiving its objections, in an attempt to be responsive Defendant refers to Response #33 above.

Interrogatory No. 35: State whether any written memoranda, specification, blueprints or other written materials of any kind or character exist relating to any testing of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19. If so, identify:

- (a) Each such written material or document; and
- (b) The custodian, identity and location of each such written material or document.

Response No. 35: Defendant objects to the form of this Interrogatory, in that it is vague, misleading, overbroad and ill-defined. In an attempt to be responsive without waiving its objection, Defendant refers to Response #11 and #32 above.

Interrogatory No. 36: State whether, after you released to the public any of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19, you ever conducted or directed any tests thereon to determine potential health hazards involved in the use of the materials.

Response No. 36: Defendant objects to the repetitive nature of this Interrogatory and refers to Response #32 above.

Interrogatory No. 37: State whether, prior to 1970, you ever had any labor inspectors or persons from your company go to job sites or other areas where your asbestos products were being used or installed to make a dust level count. If so, indicate when such a practice or procedure began, the purpose of the practice or procedure and what action, if any, was taken by you in response to the findings made as a result of said practice or procedure.

Response No. 37: Defendant has no information indicating that such tests were conducted to determine possible health hazards associated with exposure to asbestos-containing products. Prior to the mid 1960's, it was generally believed that no potential health hazards existed for those working with or around finished asbestos-containing products. It was not until the mid 1970's that the medical community first concluded that exposure to finished (manufactured) asbestos-containing products might present a potential health hazard. Relevant asbestos products were generally sold to insulation application contractors, who carried the main burden of responsibility for safety on the job. Defendant had no jurisdiction over such workers nor any right to inspect such job sites.

Interrogatory No. 38: State whether you ever conducted or directed any studies designed to learn how to minimize or eliminate the inhalation and ingestion of asbestos dust and fibers by those who use your asbestos products or are exposed to asbestos dust or fibers therefrom.

Response No. 38: Refer to Response No. 32 above. Defendant's predecessors-in-business developed and advocated the use of certain products which greatly minimized the release of airborne asbestos fiber. In the late 1950's, predecessors-in-business developed premolded products to fit around elbows and T's, which did not require cutting or shaping. Since the mid-1950's, predecessors recommended the use of an asbestos-free cement in conjunction with their high-temperature industrial insulation products. During the mid to late 1960's, predecessor's principal high-temperature insulation product contained a significantly lower percentage of asbestos fiber than did comparable competitor's products. Then in 1969 predecessors removed all asbestos from its principal high-temperature industrial insulation product.

Defendant is informed and believes that respirators approved by the U.S. Bureau of Mines will prevent the inhalation of dangerous quantities of asbestos dust and fibers. Defendant has relied upon the U.S. Bureau of Mines for the testing and reliability of respirators.

Interrogatory No. 39: Identify all trade organizations, associations or other entities to which you belong or belonged. Said organizations, etc., include, at a minimum, the following:

Asbestos Textile Institute (ATI);

Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);

Mineral Wool Institute;

Industrial Mineral Insulation Manufacturers
Institute;

Magnesia Silica Insulation Manufacturers
Association;

National Insulation Manufacturers Association
(NIMA);

Thermal Insulation Manufacturers Association
(TIMA);

Asbestos Information Association (AIA);

Quebec Asbestos Mining Association (QAMA);

National Safety Council;

Asbestos Cement Producers Association;

Refractories Institute.

Response No. 39: The Celotex Corporation and its
predecessors-in-business were members of the following
organizations:

Asbestos Information Association of North America, 1970-1972.
Thermal Insulation Manufacturers Association, since 1978.
Asbestos Cement Products Association, up until 1965.
National Mineral Wool Association, up until 1965.
Magnesia Insulation Manufacturers Association, prior to mid-
1950's.
National Insulation Contractors Association (and predecessors),
since early 1960's through 1982.
Sprayed Mineral Fiber Manufacturers Association, 1969-1971/72.
Gypsum Association, since 1939.
National Safety Council, since 1944.

To the best of Defendant's knowledge, neither Defendant nor its
predecessors-in-business belonged to any of the other
organizational associations listed in this Interrogatory.

Interrogatory No. 40: For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39, state:

- (a) Dates of membership;
- (b) Type of membership, i.e., regular or associate;
- (c) The dates and type of meetings you attended and the identity of the individuals who attended such meetings on your behalf;
- (d) The identity, title, duties and responsibilities of any individual who held an elected, appointed or self-designated position within said organization, etc.;
- (e) The names of any publications or written materials distributed by or on behalf of said organization, etc.; and
- (f) The identity of the present custodian of all written materials, notes, summaries, minutes or transcripts relating to the transactions and proceedings of said organization, etc.;

Response No. 40: Refer to Response #39 above. Various persons attended regular meetings of these organizations. Exact dates and names of attendees are unknown. Also, due to record retention policies and for reasons given in the Preliminary Statement, the subjects discussed at particular meetings are unknown to this Defendant.

Interrogatory No. 41: For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39, identify all studies, tests, research, recommendations, suggestions, seminars, symposia and/or speeches conducted or made which concerned, discussed, addressed or dealt with the actual, alleged or possible health hazards associated with exposure to asbestos.

Responses No. 41: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested.

Defendant may have received routine reports from such organizations sent in the regular course of business, but Defendant has no specific information regarding such reports. Celotex's predecessor-in-business was a member of the Asbestos Information Association of North America (AIA/NA) which organization has conducted research on the effects of asbestos. The Associations should be contacted directly for this information.

Interrogatory No. 42: With respect to each study, test, research project recommendation, suggestion, seminar, symposium or speech identified in your Answer to Interrogatory No. 41, identify:

therein;

- (a) The individuals or groups involved

- (b) The date(s) thereof;

- (c) The complete results thereof;

- (d) The recommendations, if any, which were made as a result thereof; and

- (e) The custodian, identity and location of each document which represents, refers to or contains information relating thereto.

Response No. 42: Refer to Response #41 above.

Interrogatory No. 43: Describe each action taken by you as a result of each study, test, research project, recommendation, suggestion, seminar, symposium and/or speech identified in your Answer to Interrogatory No. 41. In your Answer to this Interrogatory, state the date of each action and the identity of the individual(s) who initiated said action.

Response No. 43: Refer to Response #41 above.

Interrogatory No. 44: State whether you directed, sponsored, financed, participated in or received the results of any studies and/or tests performed by the Sarance Laboratory of the Trudeau Foundation concerning the human health consequences of exposure to asbestos.

Response No. 44: To the best of Celotex's knowledge, at this time Celotex has never directed to be performed, sponsored, financed or received the results of any studies or tests performed by the Sarance Lake Laboratory of the Trudeau Foundation, relating to asbestos exposure and its effect on human life.

Interrogatory No. 45: If your Answer to Interrogatory No. 44 is in the affirmative, identify:

(a) All documents in your possession or control which summarize or explain the results of said studies or tests;

(b) All communications, oral or written, between you and Sarance Laboratory personnel, including but not limited to Gerrit W. Schepers, M.D.;

(c) All documents relating to Sarance Laboratory studies or tests which were received or submitted by you, either directly or indirectly through predecessor(s) in interest, subsidiary(ies) or affiliate(s), if any, through other companies, or through any trade associations, organizations or entities;

(d) All recommendations or findings of such studies in relation to:

(i) adequacy or inadequacy of the threshold limit values;

(ii) the substitution of materials for asbestos; and

(e) The custodian and location of all documents and/or communications identified in your Answer to this Interrogatory.

Response No. 45: Refer to Response #44 above.

Interrogatory No. 46: State the amount of money spent or contributed by you annually from 1930 to the present for research of the relationship between exposure to asbestos dusts, fibers and/or products and any pulmonary pathology and identify each person or organization to whom the expenditure or contribution was made.

Response No. 46: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence. Without waiving its objection, Defendant states Celotex's predecessor-in-business was a member of the AIA/NA and made annual contributions. It is Celotex's understanding that this organization has conducted research on the effects of asbestos. As to what expenditures the association has made or what reports it has developed, inquiries should be directed to the association.

Further, due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. The Association should be contacted directly for this information. In addition, Defendant does not maintain such data in the ordinary course of business and is unable to respond as requested.

Interrogatory No. 47: State whether you have ever maintained a library (or libraries) which contains books, articles, periodicals, journals and/or reference materials that relate to the subjects of asbestos, industrial hygiene, medicine, safety, occupational disease and/or engineering. If so, state:

(a) The date each such library was established;

- (b) The location of each such library;
- (c) The identity of each librarian or other person in charge of the operation and materials of each such library;
- (d) For whose use each such library was established;
- (e) The title, publisher and dates of subscription to or acquisition of each such periodical or journal for each such library; and
- (f) The title, author, publisher, date and dates of acquisition of each such article and book for each such library.

Response No. 47: Neither Defendant nor its predecessors-in-business have maintained such libraries.

Interrogatory No. 48: State whether any of the co-defendants in asbestos litigation have ever furnished you with any information as to the state of the medical knowledge at any time regarding the relationship between exposure to asbestos dusts, fibers and/or products and the contracting of diseases, including asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers.

Response No. 48: Defendant objects generally to Plaintiff's Interrogatories as they seek information about the activities of "other defendants" about which Defendant has either no direct knowledge or merely unconfirmed hearsay knowledge. Information of this nature should be sought from the proper source. Without waiving its objection, this Defendant states that it never received such information other than in conjunction with pending litigation.

Interrogatory No. 49: If your Answer to Interrogatory No. 48 is in the affirmative, identify:

- (a) How the information was furnished;
- (b) Who furnished said information;
- (c) When said information was given to you; and
- (d) The substance of said information.

Response No. 49: Refer to Response #48 above.

Interrogatory No. 50: State whether, at any time since 1930, you have interchanged, exchanged or communicated, the results of research, tests, studies or experiments regarding the relationship between exposure to asbestos dusts, fibers and/or products and the contracting of diseases, including asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers, with any other person, corporation or other business entity, including co-defendants in this action.

Response No. 50: Defendant objects on the grounds that the Interrogatory is overbroad, unduly burdensome, assumes facts and seeks privileged information. Without waiving its objection, Defendant states to the best of its knowledge, neither this Defendant nor its predecessors interchanged research results other than in conjunction with pending litigation.

Interrogatory No. 51: If your Answer to Interrogatory No. 50 is in the affirmative, state:

- (a) When said interchanges, exchanges or communications occurred;
- (b) The identity of those persons, corporations or business entities who participated in said interchanges, exchanges or communications;
- (c) The content of said interchanges, exchanges or communications; and
- (d) The identity of the custodian of any documents which relate to said interchanges, exchanges or communications.

Response No. 51: Refer to Response #50 above.

Interrogatory No. 52: Identify all persons who have testified on your behalf before the Occupational Safety and Health Administration, the National Institute of Occupational Safety and Health, any United States congressional committee, sub-committee, administrative hearing or investigative proceeding on the subjects of the human health consequences of exposure to asbestos dusts, fibers and/or products and the setting, modification, feasibility and acceptance of allegedly safe or proper levels of exposure to said asbestos and asbestos products.

Response No. 52: 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.

Interrogatory No. 53: Identify all documents presented to or utilized in the preparation of testimony before the organizations, agencies or committees referred to in Interrogatory No. 52, specifying which documents were presented or utilized for each such body and the present custodian and location of each document.

Response No. 53: Refer to Response #52 above. Further, due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested.

Interrogatory No. 54: For all testimony or presentations identified in your Answer to Interrogatory No. 52, identify:

- (a) The dates and descriptions of the hearings and proceedings;
- (b) The relationship between the person who testified or responded and you; and

(c) All studies, test results, scientific and/or medical documents relied upon by each person as the basis for any recommendation made or testimony given;

Response No. 54: Refer to Response #52 above.

Interrogatory No. 55: State your knowledge relating to the meaning of "threshold limit value" as it pertains to asbestos exposure and disease.

Response No. 55: 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 Value:

- 1) OSHA 1971 and all subsequent regulations.
- 21) 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 asbestos-containing 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.

Interrogatory No. 56: With reference to "threshold limit value" (which, for purposes of this interrogatory, means how much asbestos dust and/or fibers one can safely inhale, absorb or ingest without risk of disease or illness), state:

(a) When and by what means you obtained information related thereto;

(b) The substance of any information imparted to you regarding the same; and

(c) Whether and by what means you advised or warned anyone of details relating thereto.

Response No. 56: (A) & (B) Refer to Response #55 above.

(C) Defendant objects generally to Plaintiff's Interrogatories insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving its objection, Defendant refers to Response #22 above for information as to warnings.

Interrogatory No. 57: State whether you ever knew that any governmental, private agency, and/or other entity issued guidelines suggesting a "threshold limit value" (as defined in Interrogatory No. 56) for exposure to asbestos dust and/or fibers. If so, state:

(a) The identity of the agency or other entity which issued said guidelines;

(b) The verbatim content of said guidelines;

(c) The date said guidelines were issued;

(d) The date you were first aware of the purpose of said guidelines; and

(e) The custodian, location and identity of all documents related thereto.

Response No. 57: Refer to Response #55 above.

Interrogatory No. 58: State whether you ever possessed knowledge of documents indicating that existing or proposed threshold limit values (as defined in Interrogatory No. 56) were not safe or proper or that lower threshold limit values were necessary in order to prevent diseases caused by exposure to asbestos. If so, identify:

- (a) The source of such knowledge;
- (b) The persons who obtained such knowledge;
- (c) All documents relating thereto; and
- (d) The custodian and location of all documents identified in your Answer to Part (c) of this Interrogatory.

Response No. 58: Defendant objects to the form of this Interrogatory, in that it is vague, misleading, overbroad and ill-defined. Without waiving its objection, Defendant states that due to the record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. In an attempt to be responsive, Defendant states not to the best of its knowledge other than as referred to in Response #55 above.

Interrogatory No. 59: State whether you were ever made aware that the proper method for determining safe levels of asbestos dust was to test concentrations of asbestos fibers in the air rather than the total number of asbestos particles in the air. If so, state:

- (a) The source of such knowledge;
- (b) The persons who obtained such knowledge;
- (c) All documents relating thereto; and
- (d) The custodian and location of all documents identified in your Answer to Part (c) of this Interrogatory.

Response No. 59: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence. Further, Defendant objects generally to Plaintiff's Interrogatory insofar as it requests Defendant to render a scientific opinion. Defendant is not a scientific expert and is not qualified to render scientific opinions.

Interrogatory No. 60 State in detail what tests or studies, if any, you ever conducted or directed with regard to the quantity, quality, or threshold limit values as defined in Interrogatory No. 56 of asbestos dust, fibers or particles to which insulators and others who use your asbestos products and/or others working in the same vicinity are exposed.

Response No. 60: Defendant objects to the repetitive nature of this Interrogatory and refers to Response #32 above.

Interrogatory No. 61: State in detail what research, tests or studies, if any, you ever conducted or directed to determine whether the exposure of insulation workers or others to asbestos dust exceeded the American Conference of Governmental Industrial Hygienists' (A.C.G.I.H.) recommended threshold limit values.

Response No. 61: Defendant objects generally to Plaintiff's Interrogatory insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving its objections, refer to Response #32 and #55 above.

Interrogatory No. 62: State in detail what steps, if any, you ever took to determine whether the American Conference of Governmental Industrial Hygienists' (A.C.G.I.H.) recommended threshold limit values for exposure to asbestos dust were accurate or reliable.

Response No. 62: Defendant objects generally to Plaintiff's Interrogatory insofar as it requests Defendant to render a medical opinion. Defendant is not a medical expert and is not qualified to render medical opinions. Further, Defendant objects generally to Plaintiff's Interrogatory insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving its objection, Defendant refers to Response #55 above.

Interrogatory No. 63: State your knowledge relating to the meaning of "dose response relationship" as it pertains to exposure to asbestos dusts, fibers and/or products and the contracting of disease, including: asbestosis, pneumoconiosis, mesothelioma, lung cancer and other cancers.

Response No. 63: 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.

Interrogatory No. 64: State whether you have ever placed any warranties, guarantees or other such representations on any asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 and/or on or in the containers or packages in which said products were sold, distributed or otherwise placed in the stream of commerce.

Response No. 64: Yes.

Interrogatory No. 65: If your Answer to Interrogatory No. 64 is in the affirmative, for each such product and/or container or package, identify:

(a) The inclusive dates on which each such warranty, guarantee or other representation appeared on or with the product and/or on or in the container or package;

(b) A verbatim description of each such warranty, guarantee or other representation;

(c) A description of the location on the product and/or container where each such warranty, guarantee or other representation was placed;

(d) Each of your present or former highest supervisory employees with knowledge of the decision to place any such warranties, guarantees or other representations on or with the product and/or on or in the container or package; and

(e) The custodian of all documents in your custody, possession or control which relate to or describe any such warranties, guarantees or other representations or the decision to place any of these on or with the product and/or on or in the container or package.

Response No. 65: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. In an attempt to be responsive, Defendant states that certain limited warranties have been utilized in regard to some asbestos-containing products. The language used by Philip Carey from at least mid-1957 is:

We warrant our materials to be of good quality and will replace material proved defective. This warranty is in lieu of all others express or implied and may not be extended by representatives, written sales information or drawings. While we recommend uses for our material based on tests believed reliable, we in no way guarantee particular methods of use or application or performance under special conditions.

The Celotex language, subsequent to 1972, reads as follows:

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.

Refer to copies of warranties, attached, Exhibit "L".

Interrogatory No. 66: State whether the content and/or placement of any warranty, guarantee or other representation described in your Answer to Interrogatory Nos. 64 and 65 was ever changed. If so, for each such change, identify:

(a) The nature of the change, including a verbatim description, if applicable;

(b) The date when the change was made and the inclusive dates during which such change appeared on or with the product and/or on or in the container or package;

(c) The persons with personal knowledge of the reasons for making the change; and

(d) The custodian of documents in your custody, possession or control which relate to the decision and process of making the change.

Response No. 66: Refer to Response #65 above.

Interrogatory No. 67: State when and by what means you became aware of the alleged hazards of exposure to asbestos dusts, fibers and/or products to the health of persons coming into contact with, handling or using asbestos products.

Response No. 67: Defendant objects generally to Plaintiff's Interrogatories as being vague and ambiguous insofar as they use the words "aware", "learned", as such terms are manifestly imprecise when used in a corporate context. It is not clear how or even whether an entity such as a corporation can give or refuse to give "consideration" to any possibility or recognize or agree with a given statement or belief. In essence, questions of this nature are incapable of being intelligently answered by a corporation such as this Defendant. In an attempt to be responsive, without waiving its objection, Defendant states that 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 and others 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. Celotex has been advised that mesothelioma is a form of cancer and that the actual cause of cancer is unknown. Defendant is aware of the continuing controversy, and is attempting to keep abreast of relevant medical information as it is developed.

Interrogatory No. 68: State when and by what means you became aware that exposure to asbestos dusts, fibers and/or products was acknowledged to be hazardous to the health of persons coming in contact with, handling or using asbestos products.

Response No. 68: Refer to response No. 67 above.

Interrogatory No. 69: State whether you ever learned that there is a causal connection between exposure to asbestos dust and:

- (a) Asbestosis;
- (b) Pneumoconiosis;
- (c) Lung Cancer;

(d) Mesothelioma; and

(e) Other cancers.

Response No. 69: 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. Without waiving its objection, Defendant refers to Response No. 67 above. Further, Celotex has been advised that mesothelioma is a form of cancer and that the actual cause of cancer is unknown. Defendant is aware of the continuing controversy, and is attempting to keep abreast of relevant medical information as it is developed.

Interrogatory No. 70: If your Answer to Interrogatory No. 69 is in the affirmative, identify the following as to each such disease listed therein:

(a) When and by what means you first became aware of such causal connection;

(b) If your awareness of such causal connection was obtained at any conference, lecture, convention, symposium, or other such meeting, identify the event, the person who attended on your behalf and/or any documents obtained from such event; and

(c) If your awareness of such causal connection was obtained from a medical or scientific study, or from any other published works, identify the same.

Response No. 70: Refer to response No. 69 above. In addition, Celotex is unable to accurately list all of the requested information for reasons specified in its Preliminary Statement. Celotex is informed and believes that predecessors-in-business received the following documents sometime prior to Celotex's

acquisition of the Panacorp Corporation in April, 1972. However, many of the following were not received at or near the articles' publication.

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

DATE	TITLE	AUTHORS	PUBLISHER/ PUBLICATION	DATE REC'D
1955	"Mortality From Lung Cancer in Asbestos workers"	Richard Doll	<u>British Journal of Industrial Medicine</u>	
1957	"The Asbestos Industry-Certain Health Experiences Among Asbestos Workers"	Kenneth W. Smith, M.D. and Hugh Jackson	<u>Home Office Life Underwriters Association</u>	4/63
Post 1960	"Nonoccupational Asbestosis"	Raimo Kiviluoto	<u>Medical Practices</u>	
4/24/60	"Diffuse Pleural Mesothelioma and Asbestos Exposure in the North Western Cape Province"	J.C. Wagner C.A. Sleggs & Paul Marchand	<u>British Journal of Industrial Medicine</u>	
12/3/60	"Asbestosis and Abdominal Neoplasms"	E.E. Keal	<u>The Lancet</u>	
2/1963	"Methodology In Industrial Health Studies"	Thomas F. Mancuso, M.D. MPH, and Elizabeth J. Coulter, Ph.D.	<u>Archives of Environmental Health, Vol. 6</u>	4/5/63
7/1963	"Talc Pneumoconiosis"	M. Kleinfield, M.D., C.P. Geil, M.D. J.F. Majeranowski, M.D., and J. Messite, M.D.	<u>Archives of Environmental Health, Vol. 7</u>	

10/3/63	"Case Records of the Massachusetts General Hospital"	Benjamin Castleman, M.D., Ed.	<u>The New England Journal of Medicine</u>	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	
5/6/64	"Asbestos Exposure & Neoplasia"	I.J. Selikoff, M.D., Jacob Churg, M.D., E. Cuyler Hammond, DSC	<u>Journal of the American Medical Association</u>	
10/23/64	Report and Recommendations of the Working Group on Asbestos & Cancer	Delegates who attended the meeting	International Union Against Cancer (UICC)	2/16/65
10/12/68	"The Magic Mineral"		<u>The New Yorker</u> 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	
10/71	"Asbestos, The Need For and Feasibility of Air Pollution Controls" (<u>conclusion only received</u>)		National Academy of Science	11/22/71

1/18/72 "Thetford High-
lights"

Patricia
Motherwell

Le Progress
de Thetford

1/28/72

Interrogatory No. 71: State whether you ever specifically informed the purchasers and/or users of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 that exposure to asbestos dust could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers. If so, state:

- (a) The date(s) of such notice to purchasers or users;
- (b) The means used for transmittal of such notice;
- (c) The custodian, identity and location of each document which refers to or contains information relevant to such notice; and
- (d) The identity of each person who made decisions regarding the furnishing of such notice to purchasers and/or users.

Response No. 71: (a-c) Defendant objects generally to Plaintiff's Interrogatories insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving this objection, Defendant responds: Refer to Response No. 22 above. Refer also to copies of representative sales brochures which contained warnings, marked Exhibit "M".

(d) Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Refer to the attached correspondence, notes, draft warnings, purchase orders for labels and stamps, marked Exhibit "N" which implemented the Celotex warning program in 1972 which insured compliance with Occupational Safety & Health Administration requirements.

Interrogatory No. 72: State whether you ever specifically informed the distributors identified in your Answer to Interrogatory No. 20 and/or those identified in your Answer to Interrogatory No. 21 who resold or redistributed your asbestos products that exposure to asbestos dust could cause asbestosis, pneumoconiosis, lung cancer, mesothelioma and/or other cancers. If so, state:

- (a) The date(s) of such notice;
- (b) The means used for transmittal of such notice;
- (c) The custodian, identity and location of each document which refers to or contains information relevant to such notice; and
- (d) The identity of each person who made decisions regarding the furnishing of such notice to distributors and/or those engaged in the resale or redistribution of your asbestos products.

Response No. 72: Refer to Response No. 71 above.

Interrogatory No. 73: State whether you ever provided any caution, notice, warning or other statement or explanation of the potential health hazards of exposure to asbestos on or with the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19.

Response No. 73: Refer to response No. 71 above.

Interrogatory No. 74: If your Answer to Interrogatory No. 73 is in the affirmative, state as to each product identified in your Answer to Interrogatory Nos. 8 and 19:

- (a) The date(s) on which such caution, notice, warning or other statement or explanation first appeared;
- (b) The identity of each person with knowledge of decisions made regarding the use of such caution, notice, warning or other statement or explanation;
- (c) The verbatim content of each caution, notice, warning or other statement or explanation when it was first used;
- (d) Whether the caution, notice, warning or other statement or explanation was ever altered, amended or changed. If so, how, when and why was it altered, amended or changed; and
- (e) The location of the caution, notice, warning or other statement or explanation on each such product and/or its container or package.

Response No. 74: Refer to response No. 71 above.

Interrogatory No. 75: State when you first became aware that asbestos products were being labeled with a caution, warning, notice or other statement or explanation concerning the potential health hazards resulting from the use of asbestos products and/or exposure to asbestos dust or fibers and identify the product(s) and manufacturer(s) with which such label was connected.

Response No. 75: The Celotex Corporation obtained such information in 1972 when it acquired predecessors-in-business. Shortly after such acquisition, Celotex affixed warning labels to its asbestos-containing products. The best information Celotex has regarding predecessors'-in-business awareness is that in late October, 1968, Johns-Manville Corporation notified the Secretary of Philip Carey Corporation by letter that it was putting warnings on its insulation products. At the time of such notification, predecessors'-in-business products contained a significantly lower percentage of asbestos than other manufacturers' insulation products, and further, predecessors'-in-business principal insulation products--Careytemp--became asbestos-free in 1969.

Interrogatory No. 76: Identify the officer, agent, servant, employee or other representative of yours who first obtained an awareness that asbestos products were being labeled as described in Interrogatory No. 75.

Response No. 76: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Also, refer to Response #75 above.

Interrogatory No. 77: Identify the custodian, identity and location of all documents related to the knowledge obtained by you regarding the labeling of asbestos products as described in Interrogatory No. 75.

Response No. 77: Legal Department, The Celotex Corporation, 1500 N. Dale Mabry Highway, Tampa, FL 33607. Refer also to Response #75 above.

Interrogatory No. 78: State when and by what means you first became aware that Johns-Manville Corporation or any of its affiliated companies placed on its asbestos products a caution, warning, notice, other statement or representation concerning the potential health hazards resulting from the use of asbestos products and/or exposure to asbestos dust or fibers.

Response No. 78: Defendant objects generally to Plaintiff's Interrogatories as being vague and ambiguous insofar as they use the word "aware", as such term is manifestly imprecise when used in a corporate context. It is not clear how or even whether an entity such as a corporation can give or refuse to give "consideration" to any possibility or recognize or agree with a given statement or belief. In essence, questions of this nature are incapable of being intelligently answered by a corporation such as this Defendant. In an attempt to be responsive, Defendant refers to Response #75 above.

Interrogatory No. 79: Identify the officer, agent, servant, employee or other representative of yours who first became aware that asbestos products of Johns-Manville Corporation or its affiliated companies were being labeled as described in Interrogatory No. 78.

Response No. 79: Refer to Response #75 above.

Interrogatory No. 80: Identify the custodian, identity and location of all documents related to the knowledge obtained by you regarding the labeling of asbestos products by Johns-Manville Corporation or its affiliated companies as described in Interrogatory No. 78.

Response No. 80: Defendant objects to repetitive nature of the Interrogatory and refers to Response #77 above.

Interrogatory No. 81: If upon learning that Johns-Manville Corporation or its affiliated companies labeled its asbestos products as described in Interrogatory No. 78 you did not apply such labels to the products identified in your Answer to Interrogatory Nos. 8 and 19, state:

(a) The reason(s) for such a decision;

(b) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding the same; and

(c) The custodian, identity and location of all documents pertaining to such a decision.

Response No. 81: Defendant objects to the repetitive nature of this Interrogatory and refers to Response #75 above. Refer also to Response Nos. 22, 71 and 72 above as to Defendant's warnings.

Interrogatory No. 82: State whether you specifically informed your employees, agents, servants and/or contract units that use of asbestos products and/or exposure to asbestos dust or fibers was either actually or alleged to be hazardous to their health.

Response No. 82: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as Plaintiff was not employed at Defendant's or predecessors' facility and his exposure was not the same as Defendant's or predecessors' employees. In an attempt to be responsive without waiving its objection, Defendant states that Celotex is informed and believes that Philip Carey Manufacturing Company first offered chest x-rays to its employees in some plants as early as 1950. Also, its employees were informed when the x-ray unit, sponsored by the Anti-Tuberculosis League, was in the area and were encouraged to undergo x-ray examinations since approximately 1965. Since 1972, The Celotex Corporation has provided

comprehensive medical examinations on an annual basis for its employees working with asbestos, including chest x-rays and pulmonary function tests. Professional Health Services, Inc., performed these medical examinations from 1972-1977. Hearex Corporation performed the examinations from 1978 until early 1982, and since that time Medi-Systems has been retained for these functions.

Plant safety bulletins such as those marked Exhibit "J" date back at least to 1944. Further, various safety booklet and bulletins have periodically been distributed to employees. In addition, Celotex and its predecessors have instituted in-plant safety programs.

Predecessors-in-business sold and/or disbanded their contract units prior to the Panacon-Celotex merger in 1972. Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested.

Interrogatory No. 83: If your Answer to Interrogatory No. 82 is in the affirmative, state:

(a) When and in what manner you first provided such information to these persons;

(b) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding providing information to these persons;

(c) The verbatim content of any written documents and/or communications containing such information; and

(d) The custodian, identity and location of all documents which relate or pertain to providing such information to these persons.

Response No. 83: Refer to Response #82 above.

Interrogatory No. 84: Describe in detail any precautionary procedures which you urged or required your employees, agents, servants and/or contract units to follow so as to reduce and/or avoid the potential hazards or dangers associated with use of asbestos products and/or exposure to asbestos dust or fibers and state when and how each such procedure was introduced to these individuals.

Response No. 84: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as Plaintiff was not an employee of Defendant or its predecessors-in-business. In an attempt to be responsive without waiving its objection, Defendant states it 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 believes that respirators currently approved by the U.S. Bureau of Mines, if used properly, 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.

Interrogatory No. 85: State whether you ever required your employees, agents, servants and/or contract units who worked with and around asbestos and/or asbestos products to wear respirators, gas masks, protective clothing and/or other protective devices. If so, state:

(a) Which employees, agents, servants and/or contract units, by type of employment and department, were required to use each such protective device;

(b) The date(s) on which the directive relative to each such protective device was issued for each type of employee and each department;

(c) Which type of protective device was required to be used or worn by each type of employee and each department;

(d) The identity of any agent, servant, employee, officer or representative of yours involved in discussions and decisions regarding the same; and

(e) The custodian, identity and location of all documents pertaining to protective devices.

Response No. 85: Refer to Response #84 above. Due to record retention policies and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. however, use of respirator was generally dictated by local union rules. Defendant has been informed from Defendant's predecessors-in-business that respirators were made available in each contract unit upon the request of the union worker.

Interrogatory No. 86: State whether at the commencement of an individual's employment with you, from 1930 to the present, you inform that person as to possible health ramifications of working with and around asbestos fibers, dust and/or products. If so, set forth:

(a) The nature of the warning;

(b) The manner in which said information is communicated and, if the communication is in writing, attach a copy hereto;

- (c) When such practice was initiated; and
- (d) By whom such information is communicated.

Response No. 86: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as to predecessors-in-business. In an attempt to be responsive without waiving its objection, Defendant refers to Response #82 above.

Interrogatory No. 87: State whether, based upon the material contents, the manufacturing methods and the method of application or installation of your asbestos products, your asbestos products can generally be applied by an insulator or others without liberating asbestos fibers.

Response No. 87: Defendant objects to providing such information for each such product on the grounds that this Interrogatory is overbroad and unduly burdensome. If Plaintiff will specify those products to which he was exposed, Defendant will attempt to provide the requested information. In an attempt to be responsive without waiving its objection, Defendant refers to Response #15 above.

Interrogatory No. 88: State whether it was foreseeable to you that your asbestos-containing insulation products would have to be removed, stripped or replaced at any time after installation.

Response No. 88: Objection. This Interrogatory asks for legal conclusions and is tantamount to having the defense do the research for the Plaintiff.

Interrogatory No. 89: State whether you ever provided insulators and others who would be applying or removing your asbestos products instructions concerning safety precautions to use during use of or exposure to such products.

Response No. 89: Defendant objects to repetitive nature of these Interrogatories. Further, Defendant objects generally to Plaintiff's Interrogatory insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving its objection, Defendant notes that it had no jurisdiction over such workers nor any right to inspect such jobsites. Refer to Responses #22 and #71 above.

Interrogatory No. 90: State when you first received notice that any person was claiming injury as a result of use of and/or exposure to asbestos products identified in your Answer to Interrogatory Nos. 8 and 19.

Response No. 90: The first lawsuit naming Celotex's predecessor-in-business as a Defendant in which a claimant sought recovery for a disease specifically alleged as resulting from exposure to asbestos was filed by Samuel Potter in the U.S.D.C., Eastern District, Beaumont Division, Texas, #6329 on May 27, 1969. The lawsuit was subsequently settled.

Prior to 1969, Celotex's predecessors-in-business was named as a Defendant in an action which alleged an abrasion to the lungs resulting from claimant's exposure to several different substances, one of which was asbestos. To the best of Celotex's knowledge, an asbestos-related disease was never diagnosed and the case was subsequently dismissed. Gladys Faciane vs. The Travelers Insurance Company, et al., 19th Judicial Circuit, Louisiana.

Interrogatory No. 91: With regard to the first notice of claim of injury described in your Answer to Interrogatory No. 90 and regarding all claims filed prior to 1970 for injury resulting from use of and/or exposure to asbestos products, state:

- (a) The identity of each claimant;
- (b) The date of notice of each claim;
- (c) A description of each claim;
- (d) The type of injury allegedly sustained by each claimant;
- (e) The identity of each attorney representing the individuals making such claims;
- (f) The style, case number and court applicable to each claim;
- (g) The resolution of each claim; and
- (h) The custodian, identity and location of all documents which relate or pertain to each claim.

Response No. 91: Refer to Response #90 above.

Interrogatory No 92: State whether, prior to 1970, any person filed a claim against any worker's compensation insurance carrier which provided coverage for you alleging that he or she contracted a disease as a result of use of and/or exposure to asbestos products identified in your Answer to Interrogatory No. 90.

Response No. 92: Celotex objects to furnishing a response relating to compensation claims filed by employees at Defendant's and/or predecessors' manufacturing plants. Plant employees worked with and were continually exposed to asbestos fiber in an enclosed plant environment whereas insulation applicators and others 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.

<u>Employee Name</u>	<u>Date Filed (Date Death)</u>	<u>State</u>	<u>Disposition</u>	<u>Alleged Disability</u>
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 (12/23/78)	DE	Death Claim Pending	Asbestosis Carcinoma of lung

Adolpho Serra 8/31/77 MA Death Claim - Adeno
Unknown 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 predecessors 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:

<u>Employee Name</u>	<u>Date Filed (Date Death)</u>	<u>State</u>	<u>Disposition</u>	<u>Alleged Disability</u>
James W. Riley	1954 (1/24/61)	CA	Disability Allowed 11/59	Pneumo- coniosis
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 handwritten 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:

<u>Name</u>	<u>State</u>	<u>Disposition</u>
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

As to Defendant's plant employees and the first claim filed for an asbestos-related disease, Defendant states that although Defendant lacks complete records of our predecessors-in-business, it is informed and believes Clarence Hulette filed a compensation claim alleging asbestos/silicosis in 12/1946. This claim was disallowed. However, a later claim by Mr. Hulette was allowed in 1958 for asbestosis. Mr. Hulette's claim was filed with the Ohio Bureau of Workmen's Compensation, Claim Number OD47978.

Interrogatory No. 93: If your Answer to Interrogatory No. 92 is in the affirmative, provide the following information:

(a) A list of each such claim by claimant's name, date claim filed and jurisdiction; and

(b) A brief summary of the disposition of each such claim.

Response No. 93: Refer to Response #92 above.

Interrogatory No. 94: State whether you ever received any reports or communications from your worker's compensation insurance carrier or products liability insurance carrier with regard to potential health hazards incident to use of asbestos products and/or exposure to asbestos fibers or dust.

Response No. 94: Not to the best of this Defendant's knowledge.

Interrogatory No. 95: If your Answer to Interrogatory No. 94 is in the affirmative, state:

(a) The substance of the contents of such reports or communications;

(b) The identity of the insurance carrier from which you received each report or communication;

(c) The dates of each such report or communication; and

(d) The custodian, identity and location of all documents which relate or pertain to such reports or communications.

Response No. 95: Refer to Response #94 above.

Interrogatory No. 96: State whether you ever maintained or operated a unit or units of your corporation, including, but not limited to, divisions, subsidiaries or any other entity, which was/were under contract to apply or install the asbestos products described in your Answer to Interrogatory Nos. 8 and 19.

Response No. 96: Celotex's predecessors-in-business operated Contract Branches and Sales Unit as early as 1937. Celotex's best information indicates 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 jobsite.

Interrogatory No. 97: If your Answer to Interrogatory No. 96 is in the affirmative, identify any and all claims filed by workers in such contract units for disease arising out of use of asbestos products and/or exposure to asbestos fibers or dust and, as to each such claim, state:

- (a) The date on which you first received notice;
- (b) The identity of the claimant;
- (c) The nature of the claim;
- (d) The style, case number and jurisdiction;
- (e) The resolution of the claim; and
- (f) The custodian, identity and location of all documents which relate or pertain to each claim.

Response No. 97: Refer to Response #92 above.

Interrogatory No. 98: Identify any and all insurance agreements entered into by and between any person carrying on an insurance business and you which may be available to satisfy part or all of a judgment that might be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment. As to each such agreement, identify the insurance carrier, the amount of coverage and the applicable dates of coverage.

Response No. 98: Please refer to the attached list of liability carriers for Celotex (1972 - 1984) and its predecessors-in-business, marked Exhibit "K". The extent and proper application of this coverage is the subject of litigation. Therefore, Defendant is unable to state with any certainty the extent to which these policies of insurance will be applicable to lawsuits involving asbestos-related diseases.

Interrogatory No. 99: Describe the method by which you have maintained records concerning the manufacture, sale, advertising, distribution, delivery and installation of each of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19.

Response No. 99: Defendant objects to this Interrogatory as vague, overbroad, irrelevant and unduly burdensome. In an attempt to be responsive without waiving its objection, Defendant refers to the attached copy of its record retention policy, marked Exhibit "O", as well as to the above responses.

Interrogatory No. 100: With regard to the record-keeping method described in your Answer to Interrogatory No. 99, identify:

(a) Each present and former corporate department, division or subdivision responsible for maintaining the records;

(b) How the records are kept, e.g., in boxes, files, on microfilm, microfiche or computer tape or disk;

(c) The inclusive dates of manufacture, sale, advertising, distribution, delivery and installation that the record keeping system covers;

(d) The location(s) where such records are maintained; and

(e) The identity of each person employed by you at any time from 1930 to the present, in the highest supervisory capacity, who is or was directly responsible for the collection and maintenance of such records.

Response No. 100: Refer to Response #99 above.

Interrogatory No. 101: If the record keeping system described in your Answer to Interrogatory No. 99 includes use of microfilm, microfiche, computer tape or disk or any other system in which data is taken from other records, state whether you have retained the documents or other material from which the information entered into these modes of storage was obtained. If not, indicate:

(a) The date when and location where the original records were destroyed or discarded;

(b) The custodian and location of the records prior to their destruction; and

(c) The identity of each employee, representative, official or agent of yours who ordered, authorized or supervised said destruction.

Response No. 101: Refer to Response #99 above.

Interrogatory No. 102: State whether, at any time from 1930 to the present you made any representations that the presence of asbestos in the products identified in your Answer to Interrogatory Nos. 8 and 19 made these products superior, in any way, to any asbestos-free product or material intended for the same or similar use.

Response No. 102: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Refer to Response Nos. 25 and 65 above.

Interrogatory No. 103: If your Answer to Interrogatory No. 102 is in the affirmative, indicate with respect to each such representation:

- (a) The date(s) on which the representation was made;
- (b) Its exact content; and
- (c) The manner in which it was communicated.

Response No. 103: Refer to Response #102 above.

Interrogatory No. 104: State whether, at any time from 1930 to the present, you made any representations that the use of asbestos or the use of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 was safe, harmless or not dangerous.

Response No. 104: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Refer to Response Nos. 15 and 67-70 above.

Interrogatory No. 105: If your Answer to Interrogatory No. 104 is in the affirmative, indicate as to each such representation:

(a) The date(s) on which the representation was made;

(b) Its exact content; and

(c) The manner in which it was communicated.

Response No. 105: Refer to Response #104 above.

Interrogatory No. 106: State whether any of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 were ever stored or warehoused by you in Maryland at any time from 1930 to the present.

Response No. 106: Due to record retention policy and for reasons given in the Preliminary Statement, Defendant does not have complete records and is unable to respond as requested. Refer to distributor information in Response No. 20 above.

Interrogatory No. 107: If your Answer to Interrogatory No. 106 is in the affirmative, identify:

(a) The address of each warehouse or storage facility;

(b) The asbestos products stored or warehoused at each warehouse or storage facility identified in your Answer to part (a) of this Interrogatory;

(c) The year(s) of such storage or warehousing; and

(d) The custodian, identity and location of each document in your custody, possession or control which describes or relates to such storage or warehousing.

Response No. 107: Refer to Response #106 above.

Interrogatory No. 108: Identify the means by which the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 were transported to Maryland at any time from 1930 to the present and state:

(a) If the asbestos products were transported by rail, identify the name(s) of the railroad company(ies) providing that service and the year(s) during which such service was used;

(b) If the asbestos products were transported by truck, identify the name(s) of the carrier providing that service and the year(s) during which such service was used;

(c) If the asbestos products were transported by vessel, identify the name(s) of the shipline providing that service and the year(s) during which such service was used;

(d) The identity of each employee of yours responsible for coordinating the transport or delivery of such products to Maryland;

(e) The identity of each employee, officer, agent or representative of yours with personal knowledge of the transport or delivery of such products to Maryland; and

(f) The custodian, identity and location of each document which describes or relates to the transport or delivery of such products to Maryland.

Response No. 108: Defendant objects to this question on the grounds that it is irrelevant to the instant action and not calculated to lead to the discovery of admissible evidence as the means of transportation is of no significance to this cause of action.

Interrogatory No. 109: Identify each person whom you expect to call as an expert witness at trial, state the subject matter on which each expert is expected to testify, state the substance of the findings and opinions to which each expert is expected to testify and a summary of the grounds for each opinion and produce any written report made by each expert concerning those findings and opinions.

Response No. 109: The identity of expert witnesses expected to testify at trial and related information have been provided to Plaintiffs pursuant to the Pretrial Scheduling Order applicable to these cases.

Interrogatory No. 110: With regard to expert witnesses identified in your Answer to Interrogatory No. 109, identify by case name, date, court and case number any deposition or testimony given by each such expert and state the custodian and location of transcripts thereof.

Response No. 110: Defendant objects to this question on the grounds that it is not related to the subject matter of the instant cases and unduly burdensome.

Interrogatory No. 111: Identify each person who has testified on your behalf at trial or by deposition in a case alleging asbestos-related injury, state the custodian and location of transcripts thereof, and set forth the case name, number, court and date with respect to each proceeding in which the witness testified.

Response No. 111: Defendant acknowledges being a named defendant in numerous lawsuits which allege injury resulting from asbestos-containing dust. Defendant does not have the capabilities to produce the requested information without it constituting an undue or impossible burden. Without waiving this objection, please see the attached list, marked as Exhibit "N", of former and current employees who have testified or given a deposition in an asbestos-related case.

Interrogatory No. 112: State whether you contend that asbestos products can be manufactured or treated so as to eliminate all potential health hazards to workers who use asbestos products and/or are exposed to asbestos fibers or dust. If so, explain in detail the factual basis for this contention.

Response No. 112: 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. Furthermore, the question is without any evidentiary value, because it deals with a possibility rather than a probability. Without waiving any of the aforesaid objections, Defendant states that it believes previously manufactured asbestos products (such as asbestos paper, asbestos roofing felts, asphalt saturated asbestos roofing cement, etc.) did not present any substantial health hazards to workers applying or otherwise using the products in a reasonable fashion.

Interrogatory No. 113: State whether you contend that any person or business entity not presently a party to this action is responsible in whole or in part for any of the plaintiffs' damages. If so, identify each such person or business entity and state the facts which form the basis for each such contention.

Response No. 113: Defendant does not have sufficient information at this time to respond to this Interrogatory. As discovery is still continuing in this case, Defendant is unable to state the requested information at the present time. However, Defendant intends to assert any and all defenses properly raised in the pleadings.

Interrogatory No. 114: State whether you contend that asbestos products are not inherently dangerous. If so, state all facts and documents which form the basis for such a contention.

Response No. 114: Objection. This Interrogatory asks for legal conclusions and is tantamount to having the defense do the research for the Plaintiff. Moreover, it improperly attempts to shift the burden of proof to Defendant.

Interrogatory No. 115: State whether you contend that you did not have a duty to warn users of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19 of the hazards and risks of use of and exposure thereto. If so, state all facts and identify all documents which form the basis for such a contention

Response No. 115: Refer to Response #55 and #73 above.

Moreover, Defendant objects to this interrogatory on the grounds that it is indefinite, overbroad and unduly burdensome and improperly attempts to shift the burden of proof to Defendant.

Interrogatory No. 116: State whether you contend that you performed adequate tests of the safety of the asbestos products identified in your Answer to Interrogatory Nos. 8 and 19. If so, state all facts and identify all documents which form the basis for such a contention.

Response No. 116: Defendant objects generally to plaintiff's Interrogatory insofar as the question assumes facts which render the answer misleading, prejudicial and without any probative value. Without waiving this objection, Defendant refers to Response #32 above.

Interrogatory No. 117: State whether you contend that you did not conspire with others to allow asbestos products to be used without adequate warnings, or without any warnings, regarding the hazards or risks of use of and/or exposure thereto. If so, state all facts and identify all documents which form the basis for such a contention

Response No. 117: Objection. This Interrogatory asks for legal conclusions and is tantamount to having the defense do the research for the Plaintiff. Moreover, it improperly attempts to shift the burden of proof to Defendant.

Interrogatory No. 118: State whether you contend that there are circumstances under which asbestos products can safely be handled and used. If so, state all facts and identify all documents which form the basis for such a contention.

Response No. 118: Defendant is informed and believes that respirators approved by the U.S. Bureau of Mines will prevent the inhalation of dangerous quantities of asbestos dust and fibers. Defendant has relied upon the U.S. Bureau of Mines for the testing and reliability of respirators. Refer also the Responses #15 and #112 above.

Interrogatory No. 119: State whether you contend that there is now or has ever been a distinction between one or more of the following with respect to use of and exposure to asbestos products and the health hazards or risks relating thereto: miners, millers, textile workers, asbestos plant workers, insulators, shipyard workers, steel plant workers, building tradesmen, industrial workers, and brake lining mechanics. If so, state all facts and identify all documents which form the basis for such a contention.

Response No. 119: Asbestos dust exposure comparisons are highly prejudicial and misleading in a disease process which entirely depends upon the level and duration of an individual's fiber inhalation. For example, predecessors' manufacturing plant employees worked with and around 100% raw asbestos fiber in an enclosed plant environment; whereas insulation applicators experienced relatively casual, intermittent exposure to an insulation product which usually contained between 5% and 15% asbestos.

Interrogatory No. 120: State whether you contend that there are differences between asbestos fiber types (chrysotile, amosite, crocidolite, actinolite, anthophyllite or tremolite) with regard to diseases they may be capable of causing. If so, state all facts and identify all documents which form the basis for such a contention.

Response No. 120: 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.

Interrogatory No. 121: Name any person not heretofore mentioned having personal knowledge of the facts material to this case.

Response No. 121: Not applicable to this Defendant.

PART II - SPECIFIC INTERROGATORIES
TO BE ANSWERED SEPARATELY AS TO EACH PLAINTIFF

For the following Interrogatories, use the following definitions: "Plaintiff's working years" means the years 19__ thru 19__; "plaintiff's employers" mean the companies listed on the attached Rider A, and "plaintiff's employment locations" mean those worksites listed on the attached Rider A.

PRELIMINARY STATEMENT

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 industrial insulation products. Celotex's involvement in the industrial asbestos insulation business began with its purchase of Panacon Corp. in 1972. Prior to that date, Celotex did not have any interest in the industrial asbestos insulation field.

Most 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 information 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.

To the extent that the information contained herein differs in any respect from any prior response to discovery, these answers shall be deemed to update and supersede such prior answer in any and all cases.

Celotex does not concede that any of its responses to these Interrogatories are or will be admissible evidence at a trial of this action and Celotex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

PRELIMINARY OBJECTION

Defendant objects to responding separately or specifically as to each Plaintiff, as the referred to "Rider A" is not attached to these Interrogatories.

1. Have you undertaken an investigation of the occurrence(s) alleged in plaintiff's Complaint? If so, state:

a. The identity of the person(s) participating in each such investigation;

b. Whether you have obtained statements from any witness(es) and, if so, identify:

(i) The identity of each such witness; and

(ii) The identity of the person in possession of each such statement.

RESPONSE

(A) Counsel for the Defendant have undertaken an investigation on Defendant's behalf.

(B) Defendant is in the process of deposing fact and expert witnesses named by Plaintiff. Plaintiff is aware of these witnesses and is in possession of all deposition transcripts which have been completed. In addition, because counsels' investigation is continuing, this Response may be supplemented as discovery progresses.

2. State whether you contend that you had no reason or duty to warn the plaintiff or the plaintiff's employer of the hazards and risks of use of and exposure to asbestos products. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion and improperly attempts to shift the burden of proof to Defendant. Moreover, the Interrogatory is further objectionable as it is overbroad,

indefinite as to time and unduly burdensome. Without waiving these objections, refer to Response to Interrogatory No. 115, above.

3. State whether you contend that you gave adequate warnings to users of and to those exposed to your asbestos products, including the plaintiff, of the hazards and risks of use of and exposure thereto. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant objects to this interrogatory on the grounds that it calls for a legal conclusion or opinion and assumes facts which render the answer misleading, prejudicial, and without any probative value.

4. State whether you contend that you recommend safety procedures regarding the use of and exposure to asbestos products to the plaintiff or the plaintiff's employer. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Refer to Response Nos. 22 and 71 of Part I, above.

5. State whether you contend that the plaintiff was exposed, if at all, to a safe amount of asbestos or to less than the "threshold limit" of exposure to asbestos dust and fibers from the use of and exposure to asbestos products. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff was not exposed to its asbestos-containing products. In support of its contention, Defendant will rely upon the Plaintiff's own statements, the statements of his coworkers and his employer and/or its representatives or agents.

6. State whether you contend that the plaintiff's disabilities or injuries are unrelated to the use of and exposure to asbestos products. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant believes that Plaintiff's disabilities or injuries are unrelated to his alleged exposure to asbestos products. In support of this contention, Defendant will rely upon Plaintiff's own statements of his coworkers and the opinions of Defendant's medical experts.

7. State whether you contend that the plaintiff's injuries are related in whole or in part to cigarette smoking. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's injuries are related to his cigarette smoking. In support of this contention, Defendant will rely upon Plaintiff's own statements, in deposition and in his Answers to Defendant's Interrogatories, the statements of Plaintiff's coworkers, the opinions of Defendant's medical experts and Plaintiff's medical records.

8. State whether you contend that the plaintiff's injuries are due to an act of the plaintiff's employer. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's injuries are due to an act of the Plaintiff's employer. In support of this contention, Defendant will rely upon Plaintiff's own statements,

the statements of his coworkers, the statement of his employer and/or its representatives or agents and the opinions of Defendant's "state of the art" experts.

9. State whether you contend that the plaintiff did not work with and was not exposed to any asbestos products mined, manufactured, sold and/or distributed by you. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Refer to Response No. 19(J) of Part I above.

10. State whether you contend that the asbestos products which the plaintiff used and/or was exposed to were not under your exclusive control. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant does contend that any of its products allegedly used by the Plaintiff were not under its exclusive control when used. At the time of any use, products would have been under the control of Plaintiff or his employers. In support of this contention, Defendant will rely upon the Plaintiff's own statements, the statements of his coworkers and the statements of his employer and/or its representatives and/or agents.

11. State whether you contend that there were changes made to your asbestos products after they left your control. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that changes were made to its asbestos-containing products after they left its control. In support of this contention, Defendant will rely upon Plaintiff's own statements, the statements of his coworkers and the statements of his employer and/or its representatives or agents.

12. State whether you contend that the plaintiff's claim is barred by the applicable statute of limitations. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's claim is barred by the applicable statute of limitations. In support of this contention, Defendant will rely upon Plaintiff's own statements, the statements of his coworkers, the statements of his treating physicians and the opinions of Defendant's medical experts.

13. State whether you contend that the plaintiff's claim is barred by the doctrine of assumption of the risk. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's claim is barred by the doctrine of assumption of the risk as Plaintiff continued to work with and around asbestos-containing insulation products despite his awareness of potential health hazards involved. Despite his awareness, Plaintiff voluntarily undertook to work with and around asbestos-containing products, failed to use available safety devices and failed to take other necessary precautions. In support of this contention, Defendant will rely

upon the Plaintiff's own statements, the statements of his coworkers, the statements of his employer and/or its representatives or agents and the opinions of Defendant's "state of the art" experts.

14. State whether you contend that the plaintiff's claim is barred by his alleged contributory negligence. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends the Plaintiff's claim is barred by his contributory negligence since Plaintiff applied, used or otherwise worked with asbestos-containing products in a negligent fashion, and failed to take special precautions or use safety equipment while handling, applying or working with asbestos-containing products. In support of this contention, Defendant will rely upon the Plaintiff's own statements, the statements of his coworkers, the statements of his employer and/or its representative

15. State whether you contend that the plaintiff's claim is barred by his alleged misuse of the asbestos products with which he worked. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's claim is barred by his misuse of the asbestos products with which he worked. In support of this contention, Defendant incorporates by reference its responses to Interrogatory Nos. 13 and 14, Part II.

16. State whether you contend that the plaintiff's injuries were caused by any intervening acts or superseding negligence. If so, state all facts and identify all documents which form the basis of such a contention.

RESPONSE

Defendant contends that Plaintiff's alleged injuries were caused by intervening acts or superceding negligence on the part of the Plaintiff himself and third parties. In support of this contention, Defendant will rely upon Plaintiff's own statements, the statements of his coworkers, the statements of his employer and/or its representatives or agents, Plaintiff's medical records and the opinions of Defendant's medical and "state of the art" experts.

17. Did this defendant, by itself or through its distributors, engage in the sale of asbestos products to (or application of asbestos products at) any of the plaintiff's employment locations to or any of the plaintiff's employers during the plaintiff's working years? This Interrogatory is not limited to defendant's review of existing sales records; moreover, you are expressly asked to state what steps you took, and persons or documents you consulted, other than reviewing available sales records, in effort to answer this Interrogatory.

RESPONSE

Defendant objects to answering this interrogatory on the grounds that the Plaintiff has not specified worksites where, or employers for whom, he contends he worked. Defendant therefore cannot answer. Defendant further objects to stating what steps it might take to answer this interrogatory, if answering was possible, because this information is irrelevant and not calculated to lead to the discovery of admissible evidence, protected by the attorney/client privilege and work-product doctrine, and unduly burdensome.

18. If the answer to one or more parts of Interrogatory No. 2 above is affirmative, please state as to each affirmative answer the following:

a. the date on which this defendant began such sales or activity;

b. the date on which this defendant ceased such sales or activity;

c. the type of product, and quantity sold, on each such date.

RESPONSE

Defendant objects that this interrogatory is incomprehensible in that neither "Interrogatory No. 2 above" relate to Defendants' sales of asbestos-containing products.

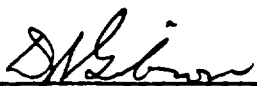
19. State the names and addresses of all individuals who have identified this defendant as a source of asbestos products to any of plaintiff's employment locations or employers in any proceeding (whether by way of answers to interrogatories, court appearance or deposition) to which this defendant was a party.

RESPONSE

Defendant objects to answering this interrogatory on the grounds that the Plaintiff has not specified worksites where, or employers for whom, he contends he worked. Defendant therefore cannot answer. Defendant further objects to stating what steps it might take to answer this interrogatory, if answering was possible, because this information is irrelevant and not calculated to lead to the discovery of admissible evidence, protected by the attorney/client privilege and work-product doctrine, and unduly burdensome. Also, refer to Preliminary Objection to Part II. In addition, Defendant does not maintain such data in the ordinary course of business and is unable to respond as requested.

The undersigned, D. S. Gibson, is Manager of Safety and Property Conservation of The Celotex Corporation. 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



D. S. Gibson
Manager of Safety & Property
Conservation

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 2nd day of Sept, 1987.



Notary Public
State of Florida
County of Hillsborough
My Commission expires: _____
Notary Public State of Florida at Large
My Commission Expires July 9, 1989.

EXHIBIT A

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 1967, Glen Alden merged Philip Carey Manufacturing Company into itself, and immediately formed a new wholly-owned subsidiary named Philip Carey Manufacturing Company (new Carey). In 1968, The Philip Carey Manufacturing Company (new Carey) changed its name to Philip Carey Corporation (Ohio).

Philip Carey Corporation (Ohio) acquired the Smith & Kanzler Corporation (Smith & Kanzler), a wholly-owned subsidiary of Dana Corporation, by way of a Stock Agreement dated 2/18/69. Smith & Kanzler became a wholly-owned subsidiary of the Philip Carey Corporation (Ohio) and on 2/28/69 changed its name to the Philip Carey Corporation (New Jersey).

In April, 1970, Philip Carey Corporation (Ohio) was statutorially merged into Briggs Manufacturing Company, a Michigan corporation, and simultaneously, Briggs changed its name to Panacon Corporation. Certain assets of the Philip Carey Corporation (New Jersey) were sold to Asbestospray Corporation of New Jersey on January 7, 1972. Philip Carey Corporation (New Jersey) was dissolved in 1972.

On June 30, 1972, Panacon Corporation was merged into The Celotex Corporation, a Delaware corporation. This merger was also statutory, and The Celotex Corporation assumed the assets and ordinary liabilities of Panacon Corporation.

EXHIBIT B

**ASBESTOS-CONTAINING INSULATION/INDUSTRIAL PRODUCTS
MANUFACTURED BY PHILIP CAREY AND/OR ITS SUCCESSORS***

	Name, Trade Name and Description	Date of Manufacture	% Asbestos
I	PIPE COVERINGS & BLOCK		
	a) 85% Magnesia pbc	1906 to 1961	11-15%
	b) Super Light 85% Magnesia pb	1951 to 1958	15%
	c) Alltemp pb	1954 to 1958	10-12%
	d) Careytemp pb	1958 to 1969('69-asb.removed)	6-7%
	e) Paper Pipe Products:		
	Aircel pb	1906 to 1960, 1969 to early 70's	60%
	Careycel pb	1920's to 1960	60%
	Carocel p	1925 to 1960	60%
	Defendex p	WWII	60%
	Excel pb	1925 to 1960	60%
	Glosscell pb	1935 to 1960	60%
	Multi-Ply pb	1930 to 1960	60%
	Asbestos Sponge pb	1930 to 1960	60%
	Fyrex p	1969 to early 70's	60+%
	f) Other Pipe Coverings Manufactured:		
	Tempcheck pbc	1952 to 1958	20%
	Hi-temp #19 pbc	1906 to 1958	20%
	Hi-temp #12 & #15 pbc	1906 to 1952	20%
	Careytemp Alum. Jacketed & Traced Pipe Insul.	1961 to 1968	6-7%
	Careytemp 2000 bc	1964 to 02/70	6.4%
	Dual Careytemp p	1964 to 1967	10%
II	ACCESSORY PRODUCTS TO INSULATION LINE		
	a) Cements:		
	707 Cement	1906 to 1960	43%
	Super 606 Cement	1906 to 1960	10%
	100 Cement	1906 to 1967	50%
	303 Cement	1906 to 1967	55%
	Careytemp Finishing Cement	1966 to 1968	22%
	MW-40 Cement	1950 to 1952	10%
	MW-50 Cement	1940 to 1967	10%
	LF-20 Asbestos Cement	Unknown to 1967	60-70%
	Vitricel Cement (#10 & #19)	1940 to 1967	15-25%
	A-101 Cement	1906 to 1967	100%
	7M-90 Asbestos Shorts Cement	1950 to 1977 (Brokered)	100%
	Specialty Cements	Unknown to 1960's	Various %
	b) Boards:		
	Thermo-bord	1925 to 1969	20%
	4.2 Careystone Sheets	1925 to 1970	22%
	Industrial A-C Boards	1925 to 1970	22%
	Cemesto Board	1930's-early 1960's	Unknown
	Careyflex Board	1925 to 1969	25%
	Marine Panel	1941 to 1950	60%
	Panel Board	1941 to 1950	60%
	Careystone Sheathing & Baffles	1925 to 1969	22%
	c) Miscellaneous Accessories:		
	Fireguard	1950 to 1976	85%
	Fireclad Jacketing	1965 to 1982	65%
	45-pound Asbestos Waterproof Jacket	1906 to 1982	85%
	Asbestos Rope & Wick	1925 to 1945	85%
III	MISCELLANEOUS PRODUCTS		
	Asbestos Papers & Roll Boards	1906 to 02/82	60-85%
	Millboards	1906 to 02/82	65-97%
	Asbesto-Sorb	1944 to 1950's	Unknown
	Spraycraft	1969 to 1971	35%
	Asbestos Felts	1960 to 1984	85%
	Asbestos Tank Jackets	1906 to 1945	60%
	Careyduct	1940 to 1955	60-85%
	Thermalite	1906 to 1937	85%
	Firefoil Board & Panel	1940 to 1960	60%
	Vitricel Asbestos Sheets	1941 to 1960	60-70%
IV	MATERIALS WHERE ASBESTOS IS FULLY ENCAPSULATED		
	Thermotex-B	1906 to 1984	14%
	228 Fibrated Emulsion	1906 to unknown	3.6%
	Insulation Seal	1930 to 1984	20%
	Fire Resistant Insul Seal	Unknown	20%
	Fibrous Adhesive	1906 to 1984	15%
	BTU Cement	1930 to 1965	25-30%
	Carey Asphalt Floor Tiles	1930's to 1975	40%
	Careytemp Adhesive	1961 to 1968	15%
	Careyduct Adhesive	1940 to 1955	15%

* All product names are listed, even if quantities sold were small.
p = pipe covering b = block c = cement

EXHIBIT C

MINNESOTA

Minneapolis - 1927, 31, 39, 40, 41, 42, 43, 45, 46

MISSOURI

St. Louis - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 52, 54, 55, 56, 58, 59,
61, 62, 63, 65, 67, 68, 69, 70, 71

Kansas - 1927, 31, 39, 40, 41, 42, 43, 45, 46

NEBRASKA

Omaha - 1927, 31

NEW JERSEY

Edison - 1968, 69, 70

Edgewater - Celotex 1972

Perth Amboy - 1958, 59, 61, 63, 65, 67, 68, 69, 70, 71

Saddle Brook - Panacron 1971

NEW YORK

Albany - 1931

Buffalo - 1927, 31, 39, 40, 41, 42, 43, 45, 46

New York (Foreign Div.) - 1931

- 1931, 39, 40, 41, 42, 43, 45, 46, 47, 52, 54, 55, 56, 57, 58, 59,
62, 63, 65, 67, 68, 69, 70, 71

NORTH CAROLINA

Charlotte - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 55, 56, 57

Greensboro - 1945, 46

Goldsboro - Celotex 1972

Raleigh - 1945, 46

OHIO

Akron - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47

Canton - 1927, 31, 39, 40, 41, 42, 43, 45, 46

Cincinnati - 1931, 30, 40, 41, 42, 43, 45, 46, 47, 52, 54, 55, 56, 57, 58, 59,
61, 62, 63, 65, 67, 68, 69, 70, 71, 72

Cleveland - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 52, 54, 55, 56, 57, 58,
59, 61, 62, 63, 65, 67, 68, 69, 70, 71

Columbus - 1927, 31, 39, 40, 41, 42, 43, 45, 46

Dayton - 1927, 31, 39, 40, 41, 42, 43, 45, 46

Elyria - 1945, 46

Lima - 1945, 46

Mansfield - 1945, 46

Sandusky - 1945, 46

Toledo - 1927, 31

Youngstown - 1931, 39, 40, 41, 42, 43, 45, 46, 47, 52

PENNSYLVANIA

Altoona - 1945, 46

Erie - 1927, 31, 39, 40, 41, 42, 43, 45, 46

Philadelphia - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 51, 52, 55, 56, 57,
58, 59, 62, 63, 65, 67, 68, 69, 70, 72

Pittsburgh - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 52, 56, 57, 58, 59, 62

RHODE ISLAND

Providence - 1963, 65, 67, 68, 69, 70

SOUTH CAROLINA

Greenville - 1945, 46

TENNESSEE

Chattanooga - 1939, 40, 41

Knoxville - 1931, 39, 40, 41, 42, 43, 45, 46

Memphis - 1957, 58, 59, 61, 63, 65, 67, 68, 69, 70, 71

UTAH

Salt Lake City - 1931

TEXAS

Dallas - 1939, 40, 41, 42, 43, 45, 46, 52

(Oil Industry Div. - 1931)

(Celotex - 1972)

Houston - 1955, 56, 57, 58, 59, 61, 63, 65, 67, 68, 69, 70, 71

VIRGINIA (See also District of Columbia)

Norfolk - 1939, 40, 45, 46, 47

Richmond - 1927, 31, 40, 41, 42, 43

WASHINGTON

Seattle - 1939, 40, 41, 42, 43, 45, 46, 47, 52, 54, 55, 56, 57, 58, 59, 61,
62, 63, 65, 67

WEST VIRGINIA

Wheeling - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47

WISCONSIN

Milwaukee - 1945, 46

EXHIBIT D

OTHER DISTRIBUTORS & SALES OFFICES

HANDLING PHILIP CAREY PRODUCTS

ALABAMA

Birmingham - The Young & Vann Supply Co. - 1927, 31, 39, 40, 41, 42, 43, 45,
46, 47, 50 & 52
Mobil - Turner Supply Co. - 1950, 52
Gulf States Insul. Co. - 1950, 52

ARIZONA

Fort Smith - Dyke Brothers - 1927, 31
Phoenix - Southwestern Mfg. & Supply - 1931
A. N. Borquist - 1939, 40, 41, 42, 43, 50, 52

ARKANSAS

Little Rock - Fischer Cement & Roofing - 1927, 31, 42, 43, 45, 46
United Insulating Co. - 1946, 47, 50, 52

CALIFORNIA

Los Angeles - Warren & Bailey Co. - 1927, 41, 42, 43, 45, 46, 47, 50
Oakland - Silicair Insulation - 1950, 52
Sacramento - Allyn L. Burr Co. - 1931
San Francisco - Jones Brothers Asbestos Supply Co. - 1927, 31
Warren & Bailey Co. - 1939, 40
Van Arsdale-Harris Co. - 1940, 41, 42, 43, 45, 46, 47
Charles Ayres Co. - 1950, 52

COLORADO

Denver - Standard Military Mfg. Co. - 1927, 31
Rocky Mountain Supply Co. - 1946, 47, 50, 52

CONNECTICUT

Bridgeport - Asbestos Distributors Inc. - 1939, 40, 41, 42, 43, 45, 46, 47,
50, 52
Hartford - The Insulation Co. - 1950

DELAWARE

Wilmington - Delaware Insulating Co. - 1950, 52

DISTRICT OF COLUMBIA (Area)

Washington, DC)
Alexandria, VA) - Asbestos Covering & Roofing Co. - 1927, 31, 39, 40, 41, 42, 43
Beltsville, MD)

FLORIDA

Jacksonville - The Cameron & Barkley Co. - 1927, 31, 39, 40, 41, 42, 43, 45,
46, 47, 50, 52
Miami - The Cameron & Barkley Co. - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Tampa - The Cameron & Barkley Co. - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Asbestos Insulating Co. - 1950, 52

GEORGIA

Atlanta - Asbestos Insulation Co. - 1952

Other Distributors & Sales Offices
Handling Asbestos Products

Page 2

ILLINOIS

Chicago - Asbestos, Asphalt & Insulation Mfg. Co. - 1939, 40, 41
Paul J. Krez - 1946, 47, 50, 52
Luse-Stevenson Co. Inc. - 1945, 46
Illinois Roofing & Insulation Co. - 1945, 46, 47, 50, 52
Peoria - Sprinkman Sons Corp. - 1946, 47, 50, 52

INDIANA

Evansville - General Insulation Co. - 1950, 52
Fort Wayne - Asbestos Insul. & Roofing Co. - 1942, 43, 45, 46, 47, 50, 52
South Bend - The General Roofing & Insulation Co. Inc. - 1950, 52

IOWA

Davenport - Economy Roofing & Supply - 1945, 46, 47, 50, 52
Des Moines - Madden Insulation Co. - 1950, 52
Sioux City - Kelly Asbestos Products - 1952
Waterloo - J. A. Neymeyer - 1950, 52

KANSAS

Wichita - Kelly Asbestos Products - 1952

KENTUCKY

Louisville - Walter L. Lacy Co. - 1927, 31
Louisville Builders Supply - 1946, 47, 50
Wholesale Service - 1952

LOUISIANA

New Orleans - J. J. Clark Co. Ltd. - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 50, 52
Reilly Denton Co. - 1945, 46, 47
Orleans Insulation & Sales Co. - 1950, 52
Shreveport - R. F. Zimmerman & Co. - 1942, 43

MARYLAND (See also District of Columbia)

Baltimore - McCormick Asbestos Co. - 1939, 40, 41, 43, 45, 46, 47, 50, 52

MASSACHUSETTS

Boston/Cambridge - Curtis Asbestos Co. - 1950

MICHIGAN

Grand Rapids - Alexander Stafford Corp. - 1945, 46, 47, 50, 52
Jackson - Jackson Insulation Co. - 1942, 43, 45, 46, 47, 50, 52
Lansing - Engineer Service Co. - 1942, 43
Garlock-Ennis Co. - 1945, 46, 47, 50
Garlock Insulation - 1952

MINNESOTA

Duluth - A. W. Kuettel Co. - 1942, 43, 45, 46, 47
Christofferson - 1950, 52
Minneapolis - W. S. Nott Co. - 1927, 31, 39, 40, 41
Asbestos Insulation & Supply Co. - 1946, 47, 50, 52

MISSISSIPPI

Jackson - Stokes Engineering Inc. - 1950, 52

MISSOURI

Kansas City - Kelly Asbestos Products - 1939, 40, 41, 42, 43, 45, 46, 47,
50, 52

NEBRASKA

Omaha - Holland Lumber Co. - 1931, 39, 40, 41
Kelly Asbestos Products - 1952

NEW JERSEY

Collingswood - Geo. L. Moffett - 1952,

NEW MEXICO

Albuquerque - Sorenson Brick & Material - 1927, 31

NEW YORK

Buffalo - Frontier Insulation & Roofing - 1950, 52
Industrial Roofing & Asbestos - 1946, 47
Jamestown - Laco Asbestos & Roofing Co. - 1946, 47, 50, 52
New York - Amour Products Inc. (Exports) - 1941, 42, 43, 45, 46
Robert A. Keasby Co. (Insul. Dept.) - 1927, 31, 39, 40, 41, 42, 43,
45, 46, 47, 50, 52
Port Chester - Asbestos Distributors Inc. - 1939, 40, 41, 42, 43, 45, 46, 47,
50, 52
Rochester - Elmer W. Davis Inc. - 1942, 43, 45, 46, 47, 50, 52

NORTH CAROLINA

Charlotte - Guy M. Beatty Insulation - 1931
Southeastern Magnesia & Asbestos Co. - 1939, 40, 41
Greensboro - Starr Davis - 1950, 52

OHIO

Akron - Asbestos Supply Co. - 1950, 52
Cincinnati - R. E. Kramig & Co. - 1927, 31, 39, 40, 42, 43, 45, 46, 47, 50, 52
Columbus - Earl E. Bright - 1942, 43, 45, 46, 47, 50, 52
Dayton - Crawford Insulation - 1950, 52
Toledo - George L. Freeman Co. - 1939, 40, 41, 42, 43, 45, 46, 47, 50, 52
Youngstown - Stanley P. Davis Co. - 1950, 52

OKLAHOMA

Oklahoma City - Kelly Asbestos Products - 1952
Tulsa - Kelly Asbestos Products - 1939, 40, 41, 42, 43, 45, 46, 47, 52

OREGON

Portland - Pacific Bldg. Materials - 1931
Pacific Asbestos & Supply - 1939, 40, 41, 42, 43, 45, 46, 47, 50, 52

PENNSYLVANIA

Jamestown - Quaker Sales Corp. - 1946, 47, 50, 52
Norristown - Asbestos Insulating Co. - 1942, 43, 45, 46, 47, 50, 52

TENNESSEE

Chattanooga - Hojocoa Corp. - 1946, 47, 50, 52
James Supply Co. - 1927, 31, 39, 40, 41, 42, 43, 45, 46
Railey Insulation - 1950, 52
Knoxville - A. G. Heins Co. - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47, 50, 52
Nashville - T. L. Helbert & Sons - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Memphis - Fischer Lime & Cement - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Goheen Roofing & Insulation - 1950, 52

UTAH

Salt Lake City - The Galiher Co. - 1927, 31

TEXAS

Dallas - Rogers Asbestos Co. - 1927, 31
El Paso - Momsen-Dunnegan-Ryan Co. - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Fort Worth - E. O. Wood & Co. - 1942, 43, 45, 46, 47, 50, 52
Houston - B. & B. Engineering - 1946, 47, 50, 52
Rogers Asbestos Co. Inc. - 1927, 31
Warren W. Bates - 1942, 43, 45, 46

VIRGINIA (See also District of Columbia)

Grundy - Buckhannon-Williamson Supply Co. - 1950, 52
Norfolk - C. E. Thurston & Sons Inc. - 1950
Richmond - Virginia Insulation Co. Inc. - 1942, 43, 45, 46, 47, 50, 52

WASHINGTON

Seattle - Pioneer Sand & Gravel Co. Inc. - 1931, 39, 40, 41, 42, 43, 45, 46,
47, 50, 52
Charles R. Brower Co. - 1946, 47, 50
Spokane - Nott Atwater Co. - 1931, 39, 40, 41, 42, 43, 45, 46, 47, 50, 52
Tocoma - George Scofield - 1931, 42, 43, 45, 46, 47, 50, 52
Tocoma Asbestos Co. - 1946, 47, 50, 52

WEST VIRGINIA

Charleston - Capital City Supply Co. - 1945, 46, 47, 50, 52
Huntington - Banks Miller Supply - 1927, 31, 39, 40, 41, 42, 43, 45, 46, 47,
50, 52
Williamson - Williamson Supply Co. - 1950, 52

WISCONSIN

Appleton - Bartelt Asbestos & Cork Co. - 1945, 46, 47, 50, 52
Green Bay - Bay Asbestos Co. - 1952
Madison - Johnson Insulation Co. - 1950, 52
Milwaukee - Industrial Roofing & Insul. - 1950, 52
Racine - Badger Roofing & Siding - 1945, 46, 47, 50, 52
Wausau - Asbestos Supply Inc. - 1950, 52

EXHIBIT E

INDUSTRIAL INSULATIONS
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 Harlem
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
Rms. 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 Dismore~~

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 Corp.
209 Center Street
Bridgeport, CT 06604
Attn: Jim Noll

A & K Midwest Insulation Company
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. P. 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 Insulation
100 Distribution Drive
Birmingham, AL 35209

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, Inc.
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

Atlas Insulations, Inc.
530 Bell Avenue
Carnegie, PA 15106

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

Batthey 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
Attn: Dick Crowe

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 Refractory Company
3545 W. Morris Street
Indianapolis, IN 46241

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

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

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

Decker Assoc. Inc.
P. O. Box 206
Orefield, PA 18069

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

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 Company
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

Gabler Insulation
1330 Tihoupitoulas 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.
Torrington, 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. G. 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

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
Bob Goodhardt

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 Coffey, 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
Charleston, SC 29407

Janos 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

Korner Rfg. & Sheet Metal Co.
7860 E. Pleasant Valley Road
Independence, OH 44131

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

Luse Stevenson Company
2050 North 15th Avenue
Melrose Park, IL 60160

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
Attn: Bill Mauldin

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 Calmelyn
Bill Humprey

Mundet Company
14401 Prairie Street
Detroit, MI 48238

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
Birmingham, AL 35210

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, Inc.
P. O. Box 521
Balleve Road
Green Bay, WI 54305
Attn: Norman Vance

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

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
Attn: Darrell English

Pipe Shields, Inc.

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.
30 U.O.P. Plaza
Algonquin & Mt. Prospect Roads
Des Plaines, IL 60016

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

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
3315 Sexton Road, S. E.
Decatur, AL 35601

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 & Materials
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
Borger, TX 79007
Attn: Harvey Jones (4)

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

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
3020 Mascot St.

Thermo 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

United Insulation Co.
817 N. Lewis Place
Tulsa, OK 74110

United Refractories
5597 Commercial Blvd.
Winter Haven, FL 33880

Universal Insulation Engineering Corp.
2416 North 81st St.

Universal Mfg. & Supply Co.
P. O. Box 751
Aiken, SC 29801

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

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

Worcester Industrial Insulations
42 Granite Street
Worcester, MA 01604

R. H. Wyatt Insulation Company
115 N. La Salle St.
Durham, NC 27705

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

EXHIBIT F

Careytemp
STATE OF INDIANA

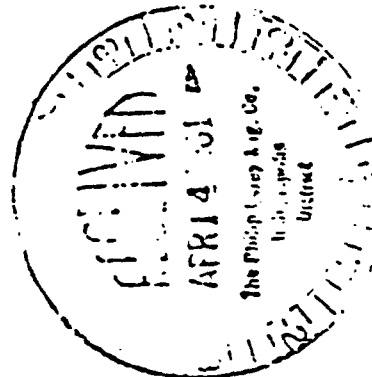
Exhibit F

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. Seott, 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 Nehoe, 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.

Mr. F. P. May
Indianapolis, Indiana

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April 13, 1961

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,
Industrial Hygiene Engineer

AE:cm

EXHIBIT G

JAMES O. PIERCE, SCD.
RETTING LABORATORY
EDEN AND BETHESDA AVENUE
CINCINNATI, OHIO 45218

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.

Mr. Arthur P. Mueller
Philip Carey Manufacturing Company
January 2, 1967, continued

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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/m³, 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

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 MDDcf	MILLIGRAMS OF PARTICULATE PER CUBIC METER OF AIR Mg/M ³
#1-Impinger- located at breathing zone of Mr. D. E. Raines, operator at saw #1 during unload- ing and cutting of insu- lation 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 Precipi- tator 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 PARTICULATE PER CUBIC METER OF AIR Mg/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

EXHIBIT H

THE PHILIP ~~Carey~~ MFG. COMPANY

May 23, 1963

Mr. L. J. Knappa, Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

Dear Mr. Knappa:

In accordance with your request, I am providing you with background data and specific recommendations, which were discussed in the joint conferences with you, Mr. Karl Krieg and Mr. Louis Pechstein.

Background:

A national awareness is developing relative to the potential and harmful effects of asbestos and asbestos products. This stems from:

- 1) The relatively recent scientific reports in England, Germany, Africa and the United States, showing a strong association between asbestos and lung cancer and mesothelioma (cancer) of the pleura and peritoneum. This is augmented by the technical weaknesses of the study conducted by the Industrial Hygiene Foundation (at the request of the Asbestos Industry) and the opinion of well qualified persons that the conclusion of a "negative" association of asbestosis and lung cancer is not really justified in this report.

These various scientific reports, the limitations of the Industrial Hygiene report and other unpublished data, were reviewed and discussed in a meeting in Washington, D. C., with representatives of the asbestos industry and the U. S. Public Health Service over one year ago and the need for extensive research expressed.

Mr. L. J. Krippa, Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

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May 23, 1963

2) The federal governmental study now officially launched (although not publicly announced) by the U. S. Public Health Service, Division of Occupational Health, of the asbestos industry in the United States, which will include comprehensive medical, engineering, chemical and statistical evaluations and studies of the work environment of representative situations in the asbestos industry. The governmental investigation at present is in the technical development stage and preparations are under way for field studies in the asbestos industry.

RECOMMENDATIONS

I Establish an inter-industry Asbestos Research Program on a national and international basis for the development of a coordinated plan of research to meet the needs of industry; to evaluate present and projected problems; and to establish the means of identifying and limiting the particular hazards involved.

Although cooperation with state and federal agencies is necessary and desirable, the asbestos industry should be in a position to make an independent judgment, based upon its own appraisal and research of the situation and the factors involved, since this judgment may have very serious implications relative to the plans and operations of the asbestos industry.

Affiliation with industry and research associates in Europe and Africa with similar interests and concerns, would make possible the benefits of these experiences and avoid duplication; make possible the demarcation of specific areas of research relative to particular questions; and the development of a unified approach to the successful continuation of asbestos operations effectively controlled and accepted by the consumer in various countries.

Mr. L. J. Knippa, Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

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May 23, 1963

The asbestos environmental hazards can definitely be controlled.

However, the lack of cooperation of other asbestos industries or the continuation of an occupational cancer exposure in a particular industry, will, in terms of public response and consumer relations, as well as law suits and Workmen's Compensation, affect all other asbestos or related industries.

II Develop a "positive" approach to consumer guidance and assistance. This would take several forms.

a) The development of recommended practice manuals containing illustrative ventilation control designs, safe handling procedures, and other similar guide lines for the effective control of dusts under various types of consumer uses. This could be prepared after an analysis of consumer uses and practices had been made by the industrial hygiene engineer recommended in III. The ventilation examples and recommended practices would relate to various products and cover broadly all operations of consumer use. This approach could be initiated by a single asbestos industry for competitive sales, or an agreement developed on an inter-industry basis as to the contents of these various manuals and their distribution.

b) Provide a technical assistance service through the company's industrial hygiene engineer for consultation and the evaluation and control of dust problems, to the large or various consumer industries and specific groups in which contractual arrangements have been made. The objective is to prevent the development of problems or any change in Workmen's Compensation and liability status of large users of the products, and to demonstrate and emphasize that the products can be used safely and effectively under proper conditions.

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May 23, 1963

III Employ a well qualified industrial hygiene engineer to establish, on a company-wide basis, a program of effective environmental, occupational and air pollution control of the various dusts, fumes, mists, gases, etc., created, emitted or used in the operations of the various company plants, and to provide technical consultation as required, for consumer relations. Some of the duties which would effect substantial savings, would be as follows:

1) Occupational Disease Control - to conduct technical industrial hygiene surveys of all work environments at the various plants, buildings and locations and for all company operations, including Canada. The objective is to identify and measure the various concentrations of harmful dusts and chemicals; determine those operations in which control measures are required; design the ventilation control measures; and subsequently determine the effectiveness of these control measures. To accomplish this, the industrial hygiene engineer would carry out all the engineering aspects of environmental evaluation and work closely with the company chemists and laboratory facilities.

On specific occupational disease claims, the industrial hygiene engineer would be able to provide precise data relative to the presence or absence of various chemicals or dusts, the concentrations and forms of these chemicals or dusts, and the concentrations and forms of these chemicals at various time periods and operations. This would be of assistance in evaluating the merits of occupational disease claims.

2) Air Pollution Control - to conduct technical air pollution surveys in designated areas in various communities in which company operations exist. Such studies require the measurement and analyses of diverse atmospheric

Mr. L. J. Knipe, Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

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May 23, 1963

contaminants from a variety of sources and the determination of the nature and extent of the company's contribution, as well as the design of the ventilation control and contaminant suppression measures required. In conjunction with this, he would develop a program of air pollution surveillance relative to company operations in various locations.

The industrial hygiene engineer would represent the company in conferences and discussions with community, state and federal officials relative to complaints and problems pertaining to air pollution.

3) Technical Consumer Assistance - to develop informative engineering control, ventilation and safe handling and use guide lines for consumer use, and provide technical consultation to specific users for the prevention and control of actual or projected problems relative to the use of the company's products. (This has been referred to in II).

4) Process Development and Product Use - to work cooperatively with the Departments of Research and Engineering in evaluating and developing necessary control measures for the possible health effects created by (1) new manufacturing processes or process changes, and (2) consumer use of new company products.

* * * * *

In summary, the background data and the recommendations made, point to the need for direct and immediate action.

It is readily apparent that unless the necessary steps have been taken, the information desired at subsequent dates may not be available to answer the questions which may be posed.

Mr. L. J. Knippa, Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

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May 23, 1963

Such information and action has a direct bearing in limiting
the extent and preventing future financial losses.

Yours very truly,

Thomas F. Mancuso

Thomas F. Mancuso, M. D.
Consulting Medical Director

TFM/kb

Cc: Mr. L. A. Pechstein
Mr. Karl F. Krieg
Lockland, Cincinnati 15, Ohio

THE PHILIP CAREY MANUFACTURING COMPANY

BUILDING MATERIALS *Carey* INDUSTRIAL PRODUCTS

CINCINNATI 15, OHIO

TELEPHONE: 821-3000

CABLE ADDRESS
"PHILCAYCO"

August 15, 1963

Mr. Louis Knippa, Lockland Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

Dear Mr. Knippa: Occupational Health Program

In further reference to our latest discussion in your office and in particular, the discussion with Mr. John W. Humphrey, President of your company, I am sending you copies of articles which have appeared in medical literature relating to the hazards of asbestos exposure in industrial employment and to the surrounding population.

These are recent articles. The most recent and perhaps the most important, is the paper presented at the Medical Association Meeting in Atlantic City on June 17, 1963, which has not yet appeared in medical literature, but which, of course, is known to the medical profession interested in this field of medicine, and is known to your trade unions, whose members were studied and whose unions participated in or partially underwrote the study.

A copy of this letter and two sets of the articles are being sent to Mr. L. A. Pechstein, Assistant Secretary, for himself and Mr. E. J. Fasold, Secretary, and a copy of this letter and one set of the articles are being sent to Mr. Karl F. Krieg, Employee Relations Manager.

Our coming meeting would be more productive and effective if you are able to review these articles beforehand.

With no intent to alarm you, may we bring to your attention another aspect of this problem. There have been recent law suits and discussions in legal and insurance circles in the past two years which would seem to indicate that employees who suffer industrial disabilities can sue fellow employees for personal liability at common law.

This refers particularly to the officers and managers of an enterprise to the extent that they do not fulfill their duties and obligations in providing a safe place for employees to work, or in detecting and removing occupational hazards and injurious exposures.

Mr. Louis Knippa, Lockland Plant Manager
The Philip Carey Manufacturing Company
Lockland, Cincinnati 15, Ohio

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August 15, 1963

This personal liability seemed so certain and costly that the 105th General Assembly attempted to rectify it.

You will shortly be informed, in an eight-page letter from your Actuaries, John T. Cantlon & Associates, Inc., of the legislative changes enacted, including the particular amendment referring to this personal liability.

The reading of the enclosed articles will also inform you of the advances made in the study and medical findings in your industry. These will later become general knowledge among the unions and your employees, and is a forerunner of the Workmen's Compensation claims of the future. In addition, there is possible liability to persons other than employees from air pollution.

Mr. Cantlon and I are looking forward to the opportunity to further discuss this with you and with others in your organization.

Personal regards,

Thomas F. Mancuso
Thomas F. Mancuso, M.D.M.P.H.
Research Consultant

TFM/kb

Enclosures

Cc to Mr. Karl F. Krieg, Employee Relations Manager
Mr. L. A. Pechstein, Assistant Secretary
Lockland, Cincinnati 15, Ohio

EXHIBIT I

For file

Preliminary Industrial Hygiene Survey
at the
PHILIP CAREY MANUFACTURING COMPANY
(December 17, 18, 19, 1962)

Preliminary Industrial Hygiene Survey
at the
PHILIP CAREY MANUFACTURING COMPANY

A preliminary industrial hygiene engineering survey was conducted at the Philip Carey Manufacturing Company, Cincinnati, Ohio on December 17, 18, 19, 1962. Observations were made of the dust-producing operations, namely those involving asbestos and free silica. In addition, various other potentially hazardous environmental conditions were noted.

The purpose of this preliminary evaluation was to establish:

1. a priority schedule - determine which dust producing operations appear to involve the greatest potential hazard. (First efforts would be directed at these operations for proper evaluation and control.)
2. a plan for environmental evaluation - indicate generally where and what types of air samples, ventilation measurements, etc., should be taken to properly define potentially hazardous areas.
3. preliminary time estimates - estimate the approximate time necessary to carry out the steps indicated in (2) above.

Environmental Evaluation -- Priority Schedule

Table I summarizes the areas recommended for environmental evaluation on a priority basis. As indicated, facilities in several of the areas were not observed in operation. Priority ratings for those areas have been based on the types of operations involved, the materials used, the existence or absence of exhaust control and room ventilation, and on the general appearance of the area's dust spillage, rafters dust accumulation, etc.

**RECOMMENDED ENVIRONMENTAL MEASUREMENTS
(OPERATIONS, AREAS OF PRIORITY)**

AREA - OPERATION	PRIORITY Ø	ENVIRONMENTAL MEASUREMENTS			COMMENT
		AIR SAMPLES	BULK SAMPLE, RAFTER DUST	VENTILATION MEASUREMENTS	
<u>IND #23</u> <u>3rd FLOOR</u> Receiving Asbestos from scrap Grinder in basement Charging port to 2nd floor beater Storage of Asbestos; handling	1 1	BZ dust count (Asbestos) GA dust count	Particle size measurement of dust. . median size . standard deviation	Measure general ventilation. (Roof fan inoperative).	
<u>2nd FLOOR</u> Beater - loading operation Storage of Asbestos; handling	2	BZ dust count GA dust count (Asbestos)	Particle size measurement.	Gen. venti- lation	
<u>1st FLOOR</u> Rotary cutting operation Scrap cutter feed operation Emulsion Dept., charge ports (3) Basement Scrap cutter (Scybolt) Scrap cutter (fed from 1st floor) Emulsion draw-off, mix	3 2 3 3 3 3	BZ dust count BZ " BZ " BZ (Asbestos) BZ (Asbestos) BZ (Asbestos)	Particle size " " " " "	Gen. venti- lation " "	Emulsion - possible air sample for . potassium bichromate . formaldehyde . silica
<u>2nd #2 - CAREY ROOFING</u> <u>TOP FLOOR</u> Addition of Asbestos thru charging ports (Ground scrap)	1	BZ Asbestos GA + Silica	Particle size for Silica + Asbestos	General venti- lation measure- ments	Possible exposure to: asphalt fumes
<u>BASEMENT</u> Roofing machine - sand addition	4	BZ - Silica	% free Silica in the dust	Gen. Vent. Meas.	Not observed in operation
<u>BLD. #2 ANNEX</u> Scrap grinder - shingles and asphalt paper	3	BZ Asbestos + Silica	% free Silica in the dust		

Recommended priority for study
* BZ - Breathing zone of operator
** GA - General room atmosphere

LOCATION - OPERATION	PRIORITY	ENVIRONMENTAL MEASUREMENTS			COMMENT
		AIR SAMPLES	BULK SAMPLE, RAFTER DUST	VENTILATION MEASUREMENTS	
<u>BUILDING #1 - PAPER MILL</u> • Asbestos addition to beaters • storage area charging to fiberizer charging onto conveyor <u>1st FLOOR</u> • Paper machine machine room dryer (area by 1st floor rollers) <u>BUILDING #2</u> • Dry cement mixer operation	1 2 2 4 1	BZ + GA (Asbestos) BZ + GA (Asbestos) GA (Asb.) BZ + GA Asbestos + Silica BZ (Asbestos) GA samples (Asbestos) BZ (Silica) GA " BZ (Asbestos) GA (Asbestos)	Particle size (Asbestos) Particle size meas. (Asb.) Part. size for fibers + Silica dust; % free Silica " " " % free Silica in dust Particle size	Gen. Vent. Measurements Gen. Vent. Measurements Gen. Vent. Measurements Meas. all local exhaust systems + gen. ventilation " Local exhaust on saws; gen. room vent. (semi-outdoors) roof only. Effect of exhaust on asphalt mix; Gen. vent.	Asphalt fumes Meas. Dow Benax 2AL (90% disodium 4-dodecylated oxydibenzene sulfonate) " (Not observed in operation) Asphalt fumes Potential exposures to asphalt Chlorothene vapors, asphalt fumes. Not observed in operation.
<u>BUILDING #3 - STILL HOUSE</u> • Vanko platform; #10 mixer and area adjacent • still area <u>BUILDING #32 - EMISSION DEPARTMENT</u> • ribbon mixer operation • slurry mixers • asphalt mix	2 - 2	BZ (Silica) GA " BZ (Asbestos) GA (Asbestos)	% free Silica in dust Particle size	(semi-outdoors) roof only. Effect of exhaust on asphalt mix; Gen. vent.	Asphalt fumes Potential exposures to asphalt Chlorothene vapors, asphalt fumes. Not observed in operation.

(cont)

OPERATION	PRIORITY	ENVIRONMENTAL MEASUREMENTS			COMMENT
		AIR SAMPLES	BULK SAMPLE, RAFTER DUST	VENTILATION MEASUREMENTS	
<u>ZONE 1A - ASBESTOS-CEMENT</u> 1st FLOOR SOUTH END					
• storage area, handling	4	GA (Asbestos)	Particle size for Asbestos	Gen. Vent.	Not operating during inspection. Priority based on type of operation, General appearance, exhaust control, number of persons involved, spillage, dust accumulation, etc.
• asbestos fiberizer operation	1	BZ + GA Asb.	"	Check local exhaust	
• Canadian Asbestos "fluffer"	1	"	"	"	
• sand unloading operation	2	BZ+GA Silica	Particle size for Silica	"	
			% free Silica	"	
• Silica grinder (ball mill)	1	BZ+GA Silica	"	"	
• Silica floor drag off (for Banco platform use)	1	GA Silica	"	"	
<u>MEZZANINE</u>					
• changing weigh cars	1	BZ + GA for Asbestos + Silica	Particle size of Asb. and of Silica; + % free Silica in rafter dust	Check all local exhaust systems and general ventilation	"
• changing stock mixers	1				
• hand charge mixer	1	GA (Asbestos + Silica)			
• bagging, elevator, collector area	2				
<u>MAIN FLOOR AREA</u>					
• board cutting and trimming	3	BZ + GA for Asbestos	Particle size of Asbestos	"	Check paint spray area (apparent good control)
• scrap cutting for trimmer	3	"	"	"	
• edge trimming	3	"	"	"	
• scrap grinding room	1	"	"	"	
<u>ZONE 127 - CAREY-TEMP.</u>					
<u>4th FLOOR</u>					
• Asbestos fiberizer	3	BZ + GA for Asbestos	Particle size of Asbestos	Gen vent. and all local exhaust systems	
• Asbestos weighing, charging	3	"	"	"	
<u>3rd FLOOR</u>					
• band saw operation	2	"	"	"	Not observed in operation.
<u>2nd FLOOR</u>					
• hand stripping operation	2	"	"	"	

CONCENT	ENVIRONMENTAL MEASUREMENTS			PRIORITY	OPERATION
	AIR SAMPLES	BULK SAMPLE, RAFTER DUST	VENTILATION MEASUREMENTS		
C	BZ (Asbestos)		Check local exhaust on all units	2	<u>UNITING #20</u> • Carbon-sew operation • Tractor saw • Portable saws (2) • Field saw • Electric saw • Small carbide saws (outside) • New saw • Grinding operation • Chain cutters • General shop area • Laminator mixing platform <u>UNITING #2 - SHINGLE MILL</u> <u>1st FLOOR</u> • Asbestos unloading hopper • Saw and mica addition to reverse side of shingle <u>2nd FLOOR</u> • Mixers, weigh scale for 1/2 dust belt conveyors for granules <u>3rd FLOOR</u> • 1/2 dust vibratory separator • slate dust store and delivery • Granule bins
	BZ			3	
	BZ			2	
	BZ			3	
	BZ			3	
	BZ	Particle size of Asbestos		3	
	BZ			2	
	BZ			4	
	BZ			3	
	GA			3	
C	GA			3	
	BZ (Asbestos)			2	
	GA (Silica)	Particle size; % free Silica		4	
	GA (Silica)			2	
	GA (Asbestos)	Particle size; % free Silica	Check enclosures, local exhaust systems; gen. ventilation		
	BZ (Asbestos)			1	
	GA Asbestos + Silica	Particle size % free Silica		1	
				2	
					Not observed in operation.

BZ sample; measure Dioxide G (sodium pentachlorophenolate) check caustic use.

Asphalt fumes

LOCATION - OPERATION	PRIORITY	ENVIRONMENTAL MEASUREMENTS			COMMENT
		AIR SAMPLES	BULK SAMPLE, RAFTER DUST	VENTILATION MEASUREMENTS	
<u>PAINT HOUSE</u> TOP FLOOR • two charging ports for mixers on 2nd floor 2nd FLOOR • mixers; charging ports • charge area for #9 mixer on 1st floor	3 1 1	BZ + GA for Asbestos + % free Silica BZ + GA for Asbestos + Silica	Particle size of Asbestos Particle size of Asbestos + Silica	Gen. ventilation Check local (slot) exhaust on charging set-up for #9 mixer	Measure chlorinated hydrocarbon concentration in air (break zones.)
1st FLOOR • #9 mixer; surrounding area • General area - other mixers and draw off points	2 2			Check local exhaust on draw off; check entire exhaust system	Asphalt fumes, chlorinated hydrocarbons, mineral spirit dust from floors above
<u>PAINT HOUSE - ROCK WOOL</u> • cupola areas • wool chamber - wool lines		Carbon monoxide, sulfur dioxide, lead fumes various binders (list to be obtained)		Gen. bldg. ventilation Local exhaust systems, inlet and outlet ends wool chamber	This building only considered briefly in this preliminary survey (directed mainly at the Asbestos and Silica dust problems). Needs attention.

Representative Air Samples

The exact number and location of breathing zone and general room air samples has not been specified for each operation. This can only be determined when detailed area evaluations are undertaken. At that time the measurements necessary to accurately describe each area will be determined by such factors as:

1. the quantities and types of materials used
2. how the materials are handled; variations in process
3. whether the operation is continuous or intermittent
4. how many persons are involved; their locations
5. whether personnel are exposed to dust from several different operations
6. changes in room air flow patterns; seasonal variations, etc.
7. effect of local exhaust systems

The problem of obtaining representative samples is a complicated one. The time required to obtain dust samples usually is of the order of minutes or hours; while a period of some months up to many years is generally required for the development of diseases from dusts. These diseases result from the integrated effect of dust breathed over a long period. On the other hand, a single in-plant dust determination represents only the amount of dust in the atmosphere at a definite time and place. It cannot give an indication of the average exposure of a man over a period of years -- particularly if he has not worked continuously at the one job.

Thus a proper measure of dust exposures requires a picture of the variations in dustiness -- the dust floods -- as well as a measure of the average concentration. The locations of the sampling points, the volume of sample to be collected, and

the frequency of sampling must therefore be chosen carefully through a detailed study of the particular operation. Generally every effort is made to evaluate a dusty area with as few samples as possible -- dust counts and particle size measurements are tedious and time consuming operations.

The casual observer might well ask why any air samples or atmospheric measurements are necessary -- some of the plant areas are quite obviously very dusty. However, it is only by actual atmospheric dust measurements that the quantity of respirable contamination can be established. Beyond this, of course, is the major objective of sampling which is to identify the principal sources of dust in order to apply appropriate control measures. Follow-up atmospheric samples then can indicate the effectiveness of such control measures.

Time Estimate -- Engineering Evaluation

Table II contains time estimates (in man-days) to conduct in-plant and laboratory measurements, to interpret and compute the results, and to formulate recommendations. These estimates are the best approximations which can be given at this time. (The actual time will depend largely upon the number of samples necessary, which in turn will vary from operation to operation as explained in the previous section, page 7.)

TABLE II
TIME ESTIMATES -- ENGINEERING SURVEY

#1 PRIORITY
 (14 Areas)

Time to Complete
(in man-days)

In-Plant Measurements

- air samples (estimate between 25 and 45 samples)
- bulk samples (est. between 10 and 15 samples)
- ventilation; local exhaust, general air movement
- occupational analysis

14

Laboratory Measurements

- dust counts (estimate between 25 and 45)
- particle size measurements (est. between 12 and 18)
- chemical analyses (est. between 5 and 8)

16

Interpretation

- computations, data analysis
- conclusions, recommendations, report

10

Total 40

#2 PRIORITY
 (19 Areas)

In-Plant Measurements

- air samples (estimate between 26 and 48 samples)
- bulk samples (est. between 12 and 17 samples)
- ventilation measurements; local exhaust, general air
- occupational analysis

15

Laboratory Measurements

- dust counts (estimate between 26 and 48 counts)
- particle size measurements (est. between 10 and 20)
- chemical analyses (est. between 5 and 8)

16

Interpretation

- computations, data analysis
- conclusions, recommendations, report

10

Total 41

TABLE II (cont'd)

#3 PRIORITY (15 Areas)

Time to Complete
(in man-days)

In-Plant Measurements

- air samples (estimate between 22 and 40 samples)
- bulk samples (est. between 5 and 8 samples)
- ventilation measurements; all areas
- occupational analysis

12

Laboratory Measurements

- dust counts (estimate between 22 and 40 counts)
- particle size measurements (est. between 6 and 10)
- chemical analyses (est. between 2 and 4)

13

Interpretation

- computations, data analysis
- conclusions, recommendations, report

8

Total 33.

#4 PRIORITY (6 Areas)

In-Plant Measurements

- air samples (estimate between 10 and 18)
- bulk samples (est. between 4 and 8)
- ventilation measurements
- occupational analysis

7

Laboratory Measurements

- dust counts (est. between 10 and 18)
- particle size measurements (est. between 4 and 8)
- chemical analyses (est. between 2 and 4)

7

Interpretation

- computations, data analysis
- conclusions, recommendations, report

5

Total 19

Lee B. Fosdick
Industrial Hygiene Engineer

THRESHOLD LIMIT VALUES

In any dusty environment there is the question of "how much" dust is safe. To help answer this question, Threshold Limit Values for various toxic materials have been established by the American Conference of Governmental Industrial Hygienists. These values of allowable air concentrations represent conditions under which most workers may be repeatedly exposed, day after day, without adverse effects. They are guides for the control of health hazards -- not fine lines between safe and dangerous concentrations.

The limits are based on the best available information from industrial experience, from experimental studies, and, when possible, from a combination of the two.

They are subject to modification as more complete data become available. In the case of dusts containing at least 45% free silica, 5 million particles of dust per cubic foot of air (mppcf) has been established as the Threshold Limit Value. For dusty atmospheres containing asbestos, the level similarly has been set at 5 mppcf.

However, because of the fibrous nature of asbestos, the threshold limit cannot be considered to be as firmly established as are limits for some of the other dusts. Techniques used for evaluating most other dusts* (considered as spherical particles) may not be entirely valid for asbestos. The etiology of asbestosis still is under study and research efforts are vitally concerned with the effect of the length and diameter of the fibers in producing lung damage.

* Based on the standard procedure for sampling and counting dusts adopted by the Fifth Annual Meeting of ACGIH (1942).

One large manufacturer of products using asbestos evaluates air samples taken in the plant for both dust and fibers. The respirable dust consists of the more or less spherical particles 10 microns* and less in diameter, while the fiber is considered to be those elongated particles greater than 10 microns in length.

A threshold limit of 5 million particles per cubic foot of air (mppcf) is applied for the dust and 1 mppcf is applied to the fiber. (The 1 mppcf fiber threshold limit is based on experimental work conducted at the Saranac Laboratories, Saranac, New York and reported in "Experimental Studies of Asbestosis".) These guide lines are said to have worked out well based on this particular industry's clinical experience.

* 1 micron is approximately $\frac{1}{25,000}$ of an inch.

EXHIBIT J

EXHIBIT K

BODILY INJURY PRIMARY LIABILITY INSURANCE CARRIERS FOR CELOTEX
AND PREDECESSORS FOR ASBESTOS-RELATED PRODUCTS LIABILITY CLAIMS

<u>CARRIER</u>	<u>TERM</u>
Aetna Casualty & Surety	10/1/72 - 10/1/77
CNA	1/1/71 - 10/1/72
American Motorists	1/1/69 - 1/1/71
Employers of Wausau	1/1/68 - 1/1/69
General Accident	1/1/49 - 1/1/68 (and all prior coverage)

BODILY INJURY EXCESS LIABILITY INSURANCE CARRIERS
FOR CELOTEX AND PREDECESSORS FOR ASBESTOS-RELATED PRODUCTS LIABILITY CLAIMS

<u>CARRIER</u>	<u>TERM</u>
Northbrook	7/16/76 - 10/1/81
North Star Reinsurance Co.	3/1/75 - 10/1/77
Home Insurance Co.	8/1/67 - 1/1/71, 3/1/75 - 10/1/79
First State Insurance	11/1/76 - 10/1/84
National Union	10/1/76 - 10/1/78, 10/1/79 - 10/1/84
American Reinsurance	8/1/67 - 1/1/71, 10/9/72 - 10/1/77
Stonewall Ins. Co.	3/1/75 - 11/1/76
American Home Insurance	3/1/75 - 10/1/76
American Motorist Insurance	4/18/72 - 7/16/76
Lloyd's of London	8/1/67 - 4/18/72, 10/1/78 - 10/1/84
CNA	1/1/55 - 1/1/71, 10/1/78 - 10/1/79
U.S. Fire	10/1/78 - 10/1/80
American Excess	10/1/78 - 10/1/83
California Union	10/1/79 - 10/1/80, 10/1/81 - 10/1/83
International	10/1/80 - 10/1/84
Employers of Wausau	10/1/80 - 10/1/84
Lexington	10/1/80 - 10/1/83
Continental	10/1/80 - 10/1/84
Transit	10/1/80 - 10/1/84
Midland	10/1/81 - 10/1/84
National Surety	10/1/81 - 10/1/84
Old Republic	10/1/81 - 10/1/82
Highland	10/1/81 - 10/1/84
Hudson	10/1/82 - 10/1/84
Integrity	10/1/82 - 10/1/84
Protective National	10/1/82 - 10/1/84
Federal	10/1/82 - 10/1/83
Granite State	10/1/82 - 10/1/84
Central National	10/1/82 - 10/1/84
Employers Mutual	10/1/82 - 10/1/84
Twin City	10/1/82 - 10/1/84
Gibraltar	10/1/82 - 10/1/84
AIU	10/1/82 - 10/1/84
INA	10/1/82 - 10/1/84
Hartford	10/1/82 - 10/1/84
Royal	10/1/83 - 10/1/84

EXHIBIT L



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.

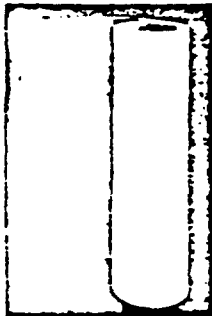
FOR ADDITIONAL INFORMATION
CONTACT YOUR NEAREST
CELOTEX REGIONAL OFFICE.

PHILIP CAREY 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. Carey 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.

Fireclad Jacketing is recommended for use in the process industries and in oil refineries, where it affords maximum resistance to the spread of fire — and further protects the insulated surface from weather damage. Furnished in approximately 45 lb. rolls 38" wide by 34'6" long, containing 108 sq. ft.



ASBESTOS FELT

Asbestos felts in various weights are used to protect insulated piping and equipment from weather damage. The asbestos base of these felts is highly resistant to weather damage and provides long lasting protection.

ASBESTOS PAPER AND ROLLBOARD

Asbestos Paper and Rollboard are strong, flexible, fire-resistant sheets composed of pure Canadian asbestos fibre and free from hard, rocky particles. 6-lb. and 8-lb. Commercial Grade Asbestos Papers are used extensively in the manufacture of various pipe insulation and electrical insulation. The 10-lb. 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. Furnished in standard widths of 18", 24", 36" and 37½" rolls. Special sizes can be made to order.

ASBESTOS MILLBOARD

Asbestos Millboard is made from pure Canadian asbestos fibre pulp mixed with binding materials and formed in sheets. Asbestos Millboard is used extensively in the electric heating field and glass industry. It is recommended for use in fire screens and partitions, as a fire-proof lining for ceilings, walls, floors, elevator shafts, motion picture machine booths, ranges, stoves, grates, electric ovens, sterilizers and roasters. No. 7 grade withstands temperatures up to 800° F.; No. 1 grade withstands temperatures up to 1000° F. Furnished in 42" x 48" sheets in thicknesses from ¼" to 1".

ORGANIC FELTS

Organic felts are available for economical weather-proofing of piping and equipment. They do not have the aging characteristics of asbestos but will provide years of satisfactory protection.

WARRANTY:

We warrant our materials to be of good quality and will replace material proved defective. This warranty is in lieu of all others express or implied and may not be extended by representatives, written sales information or drawings. While we recommend uses for our material based on tests believed reliable, we in no way guarantee particular methods of use or application or performance under special conditions.

THE PHILIP CAREY MFG. COMPANY • CINCINNATI, OHIO 45215

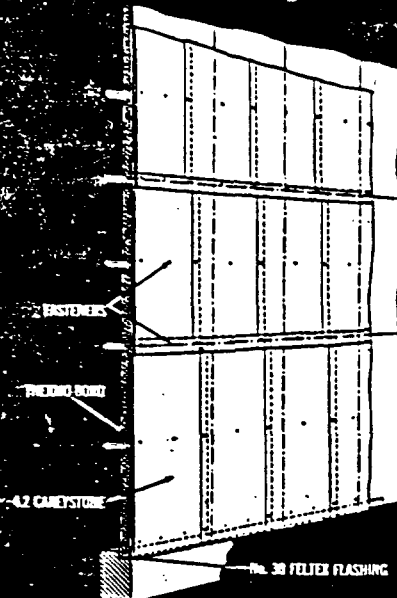
DISTRICT OFFICES AND WAREHOUSES

ATLANTA 2033 Tucker Industrial Road Tucker, Georgia 30084 404-939-1505	MONTREAL The Philip Carey Co., Ltd. 95 Stinson Boulevard Ville St. Laurent Montreal 9, P.Q., Canada 514-748-6331
BOSTON 763-O Concord Avenue Cambridge, Mass 02138 617-876-7700	NEW YORK Smith Street & Victory Bridge Perth Amboy, N.J. 08862 201-226-6681
CHICAGO 2511 & Warren Avenue Bellwood, Illinois 60104 312-287-7232	PHILADELPHIA 24th and Sedgley Ave. Philadelphia, Pa. 19132 215-229-6430
CINCINNATI 316 South Wayne Avenue Cincinnati, Ohio 45215 513-821-3600	PROVIDENCE 40 Patton Road East Providence, R.I. 02916 401-434-0250
CLEVELAND 4515 W. 160th Street Cleveland, Ohio 44135 216-671-6270	ST. LOUIS 10247 Midwest Industrial Blvd. St. Louis, Missouri 63132 314-473-5550
DETROIT 14420 Livernois Avenue Detroit, Michigan 48238 313-368-7600	WASHINGTON 10710 Hanna Street Beltsville, Maryland 20705 301-478-8922
HOUSTON 1430 North Post Oak Road Houston, Texas 77024 713-686-3761	WEST COAST Los Angeles Area: Insulations Division 532 So. Monterey Pass Monterey Park, Calif. 91754 213-283-8557
INDIANAPOLIS 1432 Kentucky Avenue Indianapolis, Indiana 46221 317-635-1314	Other Than Los Angeles Area: 13711 Fireway Drive Santa Fe Springs, Calif. 90670 213-862-6740
MEMPHIS 1510 Brenda Road Memphis, Tennessee 38107 901-526-8861	

thermo-wall construction

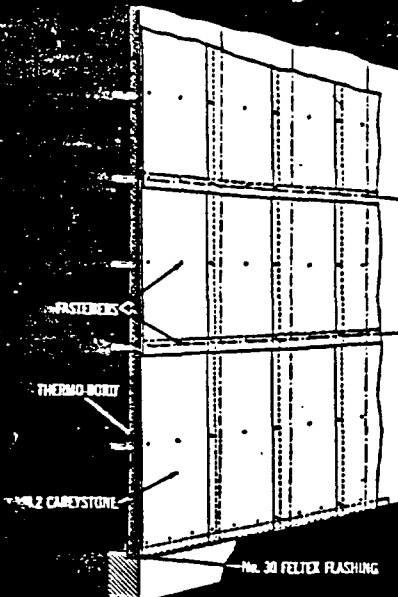
Popular Methods of Erecting and Fastening

METHOD #1



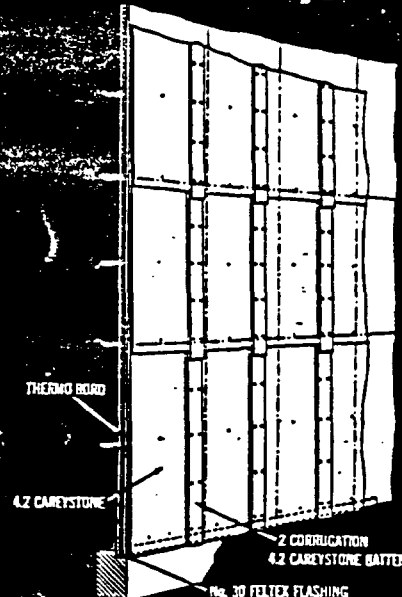
This is the popular, low-cost, method using 6" end lap and one-corrugation side lap.

METHOD #2

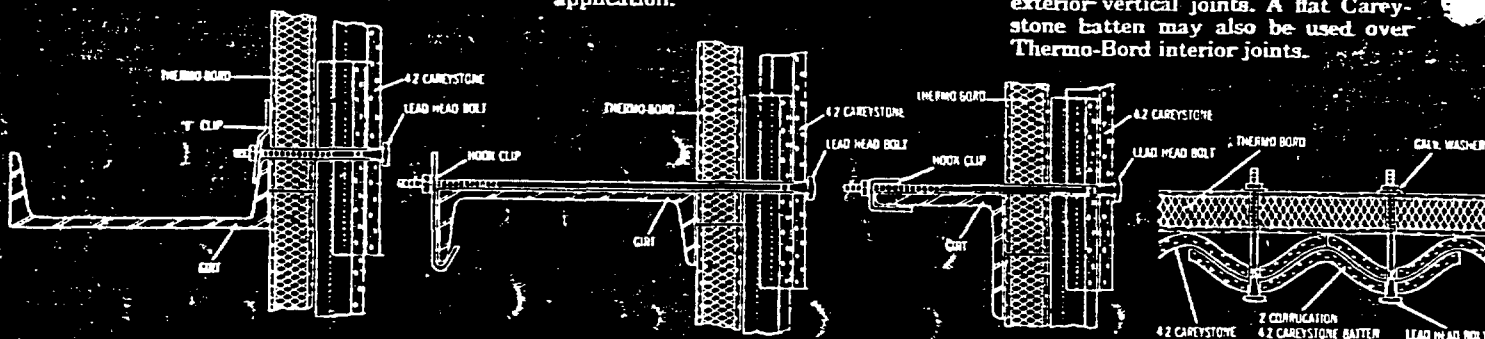


The standard method of thermo-wall construction is similar to Method #1 except that corners of the corrugated sheets are cut for straight-line application.

METHOD #3



The batten method has been the most widely used. Sheets are butted at sides, overlapped 6" at ends, and then a 2-corrugation batten is used on the exterior vertical joints. A flat Careystone batten may also be used over Thermo-Bord interior joints.



NOTE: Standard fastening method consists of lead head bolts and clips. Other types of recently developed fastening methods may be employed.

RECOMMENDED GIRT & PURLIN SPACINGS FOR THERMO-WALL CONSTRUCTION

	3/4" THERMO-BORD	1 1/4" THERMO-BORD	1 3/4" THERMO-BORD	2" THERMO-BORD
Max. Girt Spacings	7'0"	8'0"	10'0"	10'0"
Max. Purlin Spacings	4'9"	5'6"	6'3"	7'0"

WARRANTY

We warrant our materials to be of good quality and will replace material proved defective. This warranty is in lieu of all others express or implied and may not be extended by representatives, written sales information or drawings. While we recommend uses for our material based on tests believed reliable, we in no way guarantee particular methods of use or application or performance under special conditions.

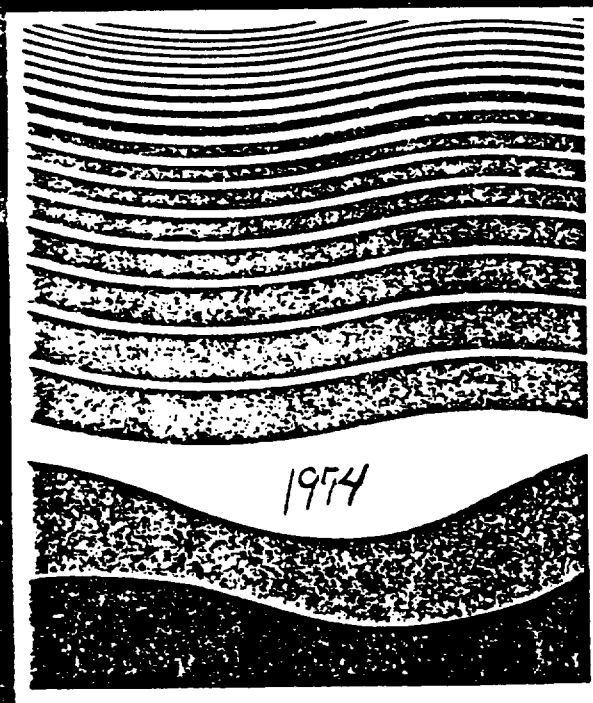
THE PHILIP Carey MFG. COMPANY
LOCKLAND, CINCINNATI 15, OHIO

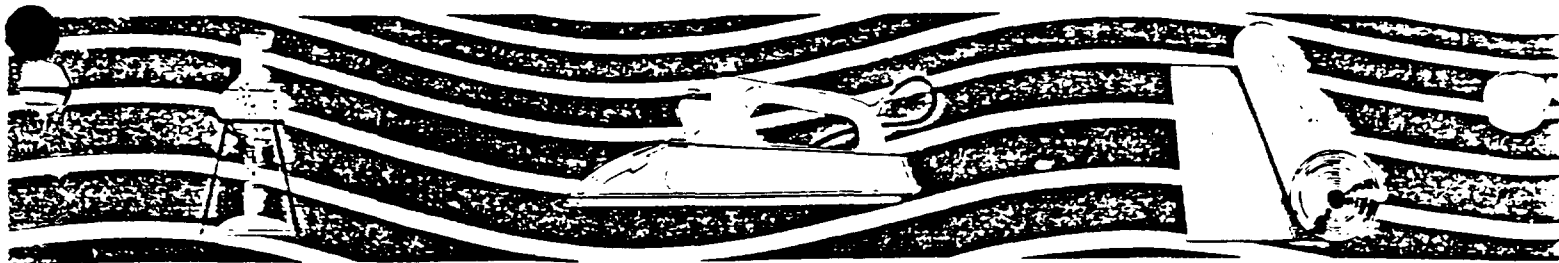
District Sales Offices:

• Atlanta • Chicago • Boston • Charlotte • Cincinnati • Cleveland
• Detroit • Houston • Los Angeles • New York • Philadelphia • Pittsburgh
• St. Louis • San Francisco • Seattle • Montreal, P.Q. Canada • Des Moines
• Memphis • Indianapolis

EXHIBIT M

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

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

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.

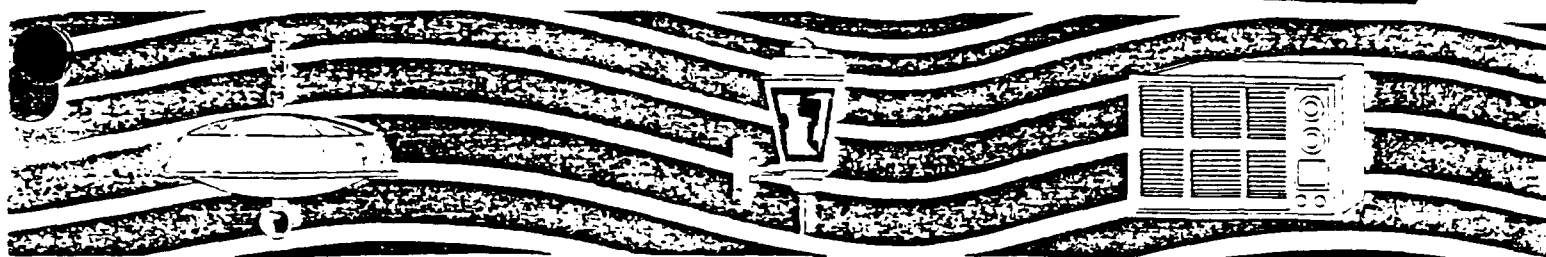
APPLICATIONS: Asbestos Paper and Rollboard are satisfactory for a great variety of purposes. The 6 and 8-lb. papers are used in the manufacture of various pipe and electrical insulations. The 10 and 12-lb. papers are used for wrapping hot air furnace pipes. Heavier weights are used for lining stoves,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

Other prospective applications for this material might include:

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

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 ($\frac{1}{4}$ " 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 $\frac{1}{4}$ " 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.

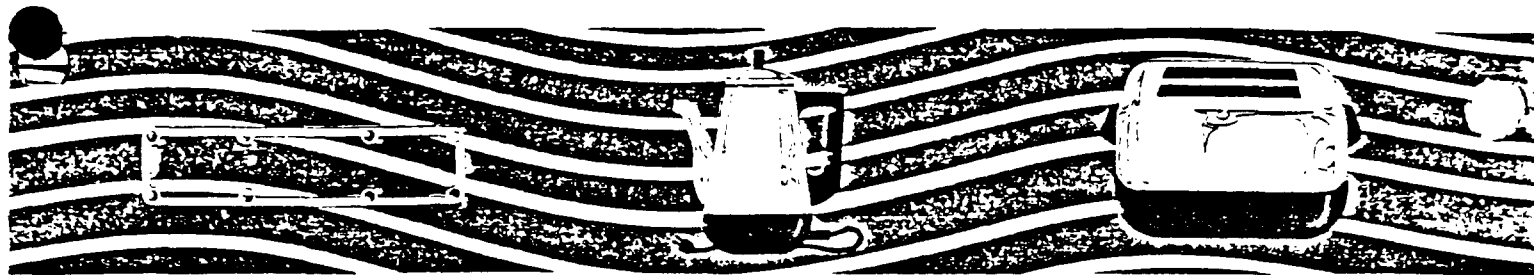
APPLICATIONS: Careyfoil is used in the construction of low and medium heat ovens for residential and commercial use. It is also used with furnaces and hot water heaters.

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.



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
1**	66.5	76.0

* Typical weights.

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 glasslehr 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

Household appliances

Kiln 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 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:

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

or included as part of the selling price? _____

Who is present supplier? _____

Give competitive product identification _____

Approximate price now being paid _____

(FOLD, STAPLE AND MAIL)

FOLD HERE

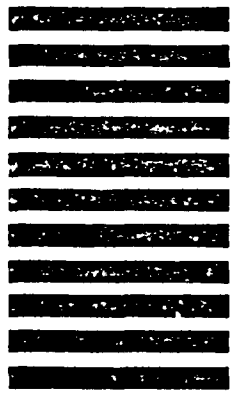
BUSINESS REPLY MAIL

No postage necessary if mailed in United States
Postage will be paid by

THE CELOTEX CORPORATION

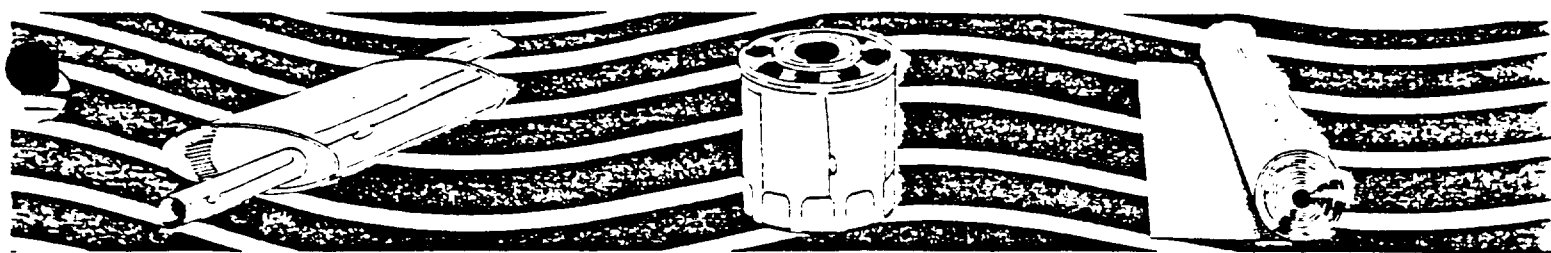
1500 NORTH DALE MABRY
TAMPA, FLORIDA 33622

FIRST CLASS
PERMIT #269
TAMPA, FLA.



ATTN: INDUSTRIAL MARKETING DEPARTMENT

FOLD HERE



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 resilience, 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.

Celotex® THE CELOTEX CORPORATION
BUILDING PRODUCTS TAMPA, FLORIDA 33622

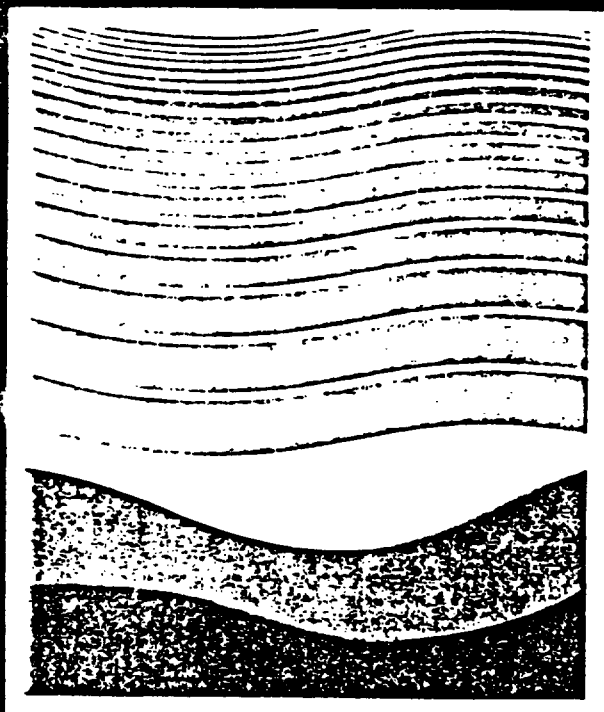


Waters company

NORTHERN DIVISION
640 PEARSON STREET
DES PLAINES, ILLINOIS 60016
TELEPHONE: 312/298-1936

SOUTHERN DIVISION
1900 MAC ARTHUR BLVD., N.W.
ATLANTA, GEORGIA 30018
TELEPHONE: 404/352-2128

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 stirred components into rolls. The material is thoroughly dried and, finally, calendared 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 37" ±. 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	3	3	3	3	3	3	3

** Values are typical. Tests are not performed on routine basis.

†† This material may also be called 1/16" Rollboard

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 (1/4" 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 1/4" 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
Smoke Developed	0

SEE UL CLASSIFIED BUILDING MATERIALS INDEX



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 membrane 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 paint 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 latexes selected for specific requirements, they are resilient, non-corrosive, fungus resistant and dimensionally stable.

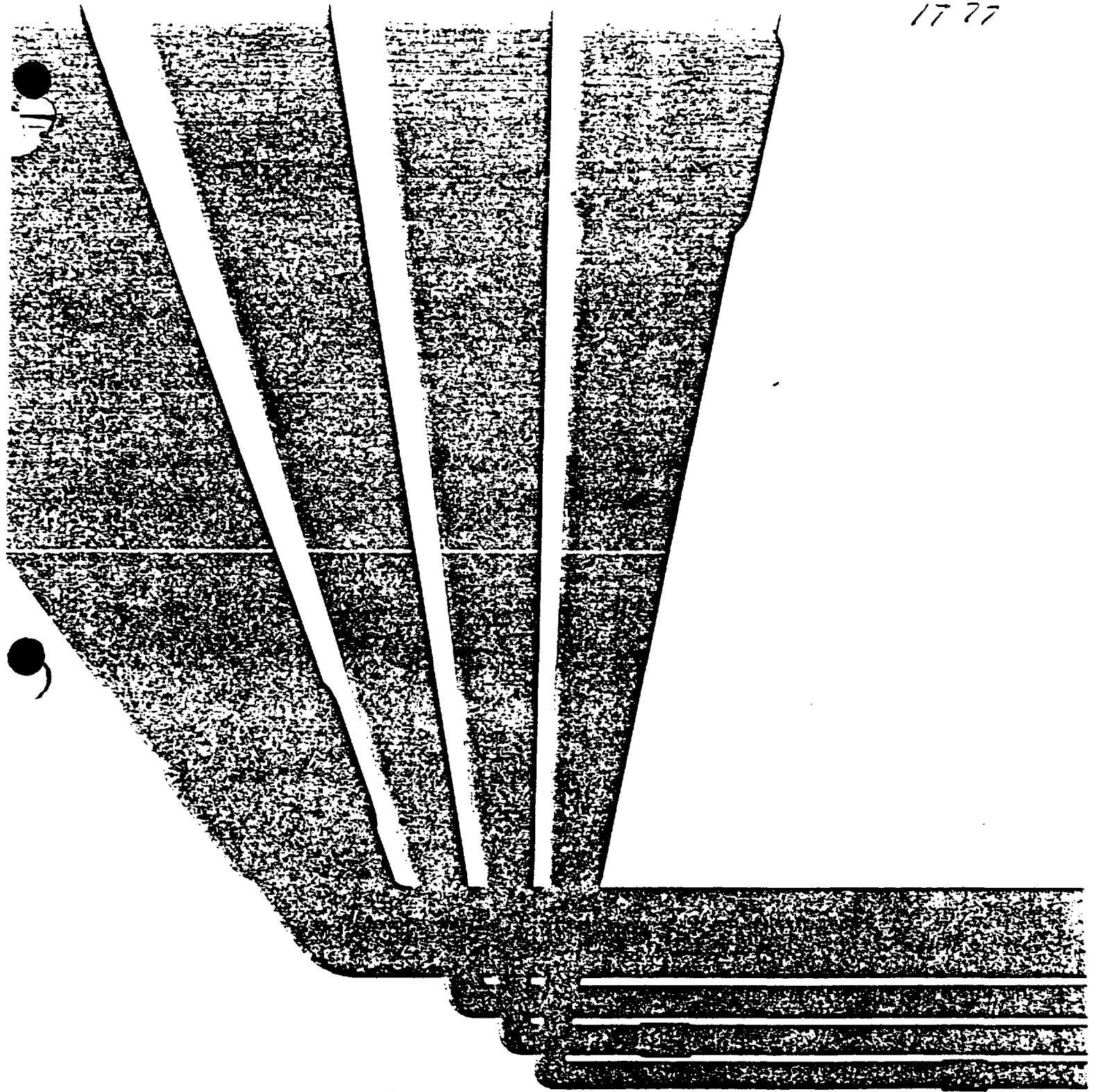
FOR ADDITIONAL INFORMATION
CONTACT YOUR NEAREST
CELOTEX REGIONAL OFFICE.

Celotex THE CELOTEX CORPORATION
TAMPA, FLORIDA 33622

a Jim Walter company

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TELEPHONE: 312/298-1936

SOUTHERN DIVISION
1900 MACARTHUR BLVD., N.W.
ATLANTA, GEORGIA 30018
TELEPHONE: 404/352-2128



Celotemp[®]
1500 Insulation
by Celotex

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 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 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

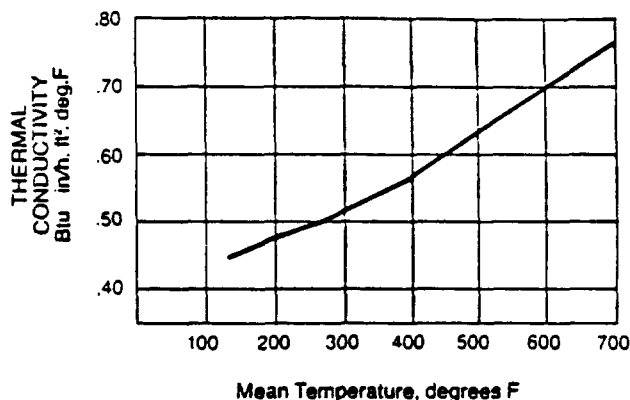
To insure total insulation throughout the system, the use of CELOTEMP premolded elbows is recommended. Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

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	.70
1500°F. for 24 hours	1.60
Water absorption (percent)	
By volume @ 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. SpecificationC-610-67

*All tests conducted according to standard ASTM test methods.

Standard Sizes

Copper tubing — ¾", 1", 1½", 1¾", 2½", 3½" O.D. half sections
 Iron pipe — ¼" through 24" IPS, half sections
 Thickness — 1" through 3½", single layer
 Segmental — 12¾" 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, 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. 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.

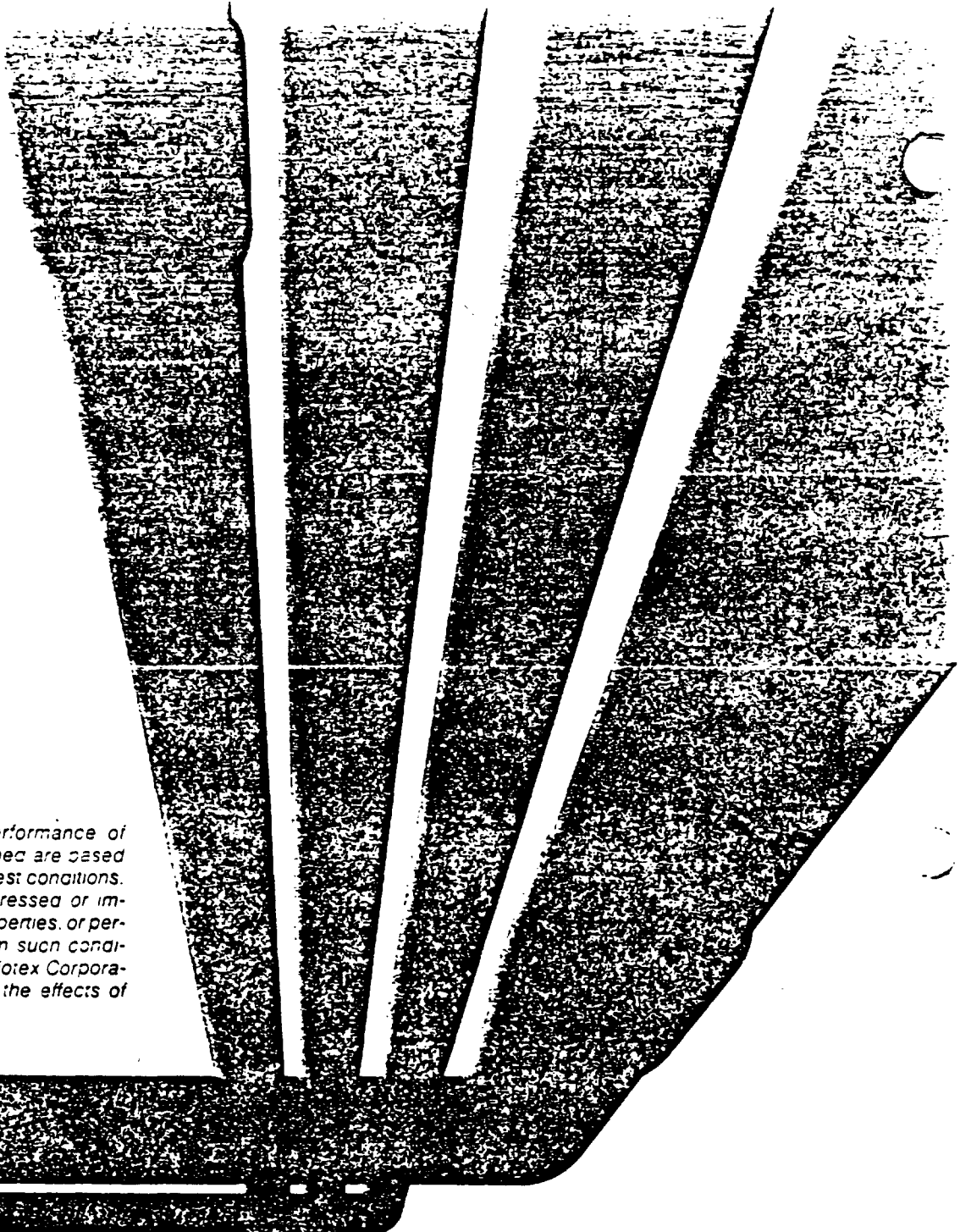
Fireclad Jacketing†

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

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.



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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 and Block Insulation

Celotex

1977

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 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 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

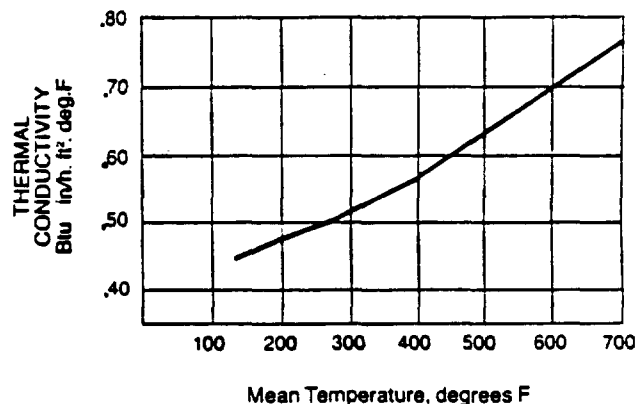
To insure total insulation throughout the system, the use of CELOTEMP premolded elbows is recommended. Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

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	.70
1500°F. for 24 hours	1.60
Water absorption (percent)	
By volume @ 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. SpecificationC-610-67

*All tests conducted according to standard ASTM test methods.

Standard Sizes

Copper tubing — ¾", 1", 1½", 1¾", 2", 2½", 3" O.D. half sections
Iron pipe — ¼" through 24" IPS, half sections
Thickness — 1" through 3½", single layer
Segmental — 12¾" 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.

1977

Cements and Adhesives

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.

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. 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.

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.

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THE CELOTEX CORPORATION
TAMPA, FLORIDA 33622

a Jim Walter company

**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

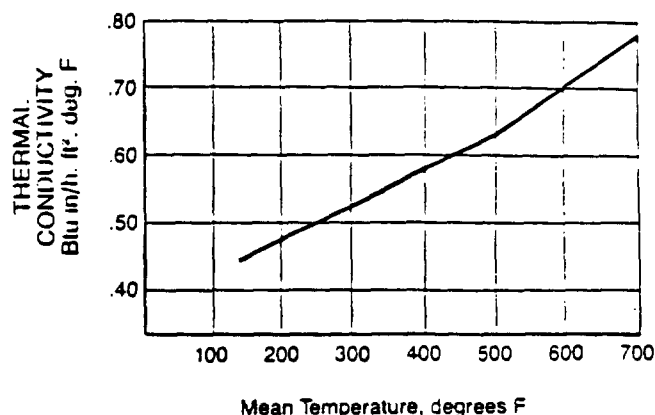
To insure total insulation throughout the system, the use of CELOTEMP premolded elbows is recommended. Premolded elbows help to eliminate voids and mitering segments, which helps reduce installation time and cost.

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	.60
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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—12¾" 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".



MF-1200 Block is recommended for use to 1200°F. This non-hygroscopic product is produced in 12" x 36" and 24" x 36" sizes in 1", 1½" and 2" thicknesses.

MF-1400 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.

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.

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†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.

The Celotex logo, featuring the word "Celotex" in a stylized, bold, sans-serif font. The letters are white with a black outline, set against a dark background. The logo is positioned in the lower center of the page, above a large, dark, abstract graphic that resembles a stylized mountain range or a series of stacked blocks.

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.

NORTHERN REGION
640 PEARSON STREET
DES PLAINES, ILLINOIS 60016
TELEPHONE: 312/298-1936

SOUTHERN REGION
1900 MACARTHUR BLVD., N.W.
ATLANTA, GEORGIA 30018
TELEPHONE: 404/352-2128

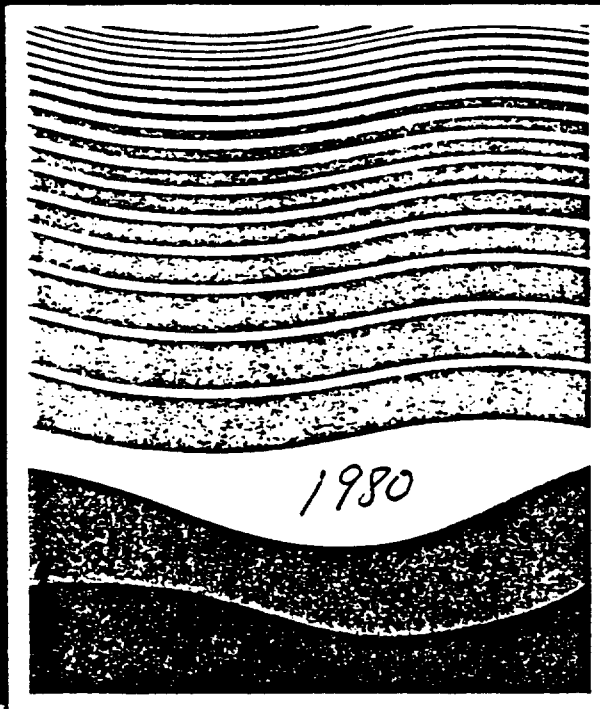
Celotex[®]

INDUSTRIAL PRODUCTS
Industrial Sales Department (813) 871-4575

THE CELOTEX CORPORATION
TAMPA, FLORIDA 33622

a JmWalter company

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 stirred 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 Grade Min.	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

** Values are typical. Tests are not performed on routine basis.

++ This material may also be called 1/16" Rollboard

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 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 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
Smoke Developed	0

SEE UL CLASSIFIED BUILDING MATERIALS INDEX



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 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 membrane 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.



THE CELOTEX CORPORATION
TAMPA, FLORIDA 33622

a Jim Walter company

**Industrial
paper and felt products.
Strong, versatile
and fire-resistant.**

clotex

Commercial Asbestos Paper and Rollboard.

Celotex Asbestos Paper and Rollboard products are strong, flexible, fire-resistant materials made from Canadian asbestos fiber and a small quantity of exceptionally strong binding material.

Processed to a smooth finish by a unique paper-making system, this popular line of industrial products has countless uses in a

wide range of industries. From being used in the manufacturing of insulation, to wrapping hot air furnace pipes, to various commercial uses.

Celotex Asbestos Paper and Rollboard vary only in thickness and width of rolls. They come in standard 12", 18", 24" and 36" widths. (Special sizes can be made to order.)

Standard weights and thicknesses of sheets are as follows:

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, Nominal	.015	.018	.022	.025	.028	.032	.060-.064
Tensile Strength, Dry Pounds/in. With Grade Min.	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

Typical Characteristics Commercial Asbestos Rollboard

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

*Values are typical. Tests are not performed on routine basis.

†This material may also be called 1/16" Rollboard.

Asbestos Millboard.

Used extensively in the electric heating and glass-making industries, Celotex Asbestos Millboard is made from Canadian asbestos fiber pulp mixed with binding materials and formed in sheets.

It is produced in two grades: #1 Hard (withstands temperatures to 1000°F) and #7 Medium (withstands temperatures to 800°F). These two grades satisfy most requirements. However, special grades can be custom developed by Celotex. Asbestos Millboard with pin-point (knurled) finish can also be supplied.

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

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.

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. Smoking greatly increases the risk of serious bodily harm.

Celotex

a Jim Walter company

The Celotex Corporation, Tampa, Florida 33622

EXHIBIT N



INTERNAL CORRESPONDENCE

TO: C. W. Wright - Lockland

FROM: T. R. Larimer

SUBJECT: CAUTION LABELS - ASBESTOS
PAPER AND MILLBOARD

DATE: July 19, 1972

CC: E. A. DiSalvo
L. J. Knippa
S. A. Sauerland

After reviewing the specimen stamped caution label you provided, I agree that it is satisfactory for use on shipping packages for all millboard materials and rolls of asbestos paper which do not use a standard label.

I suggest the caution warning for the printed label be done in the style and size of the warranty statement that is now included there. At this point, and until we have new labels printed, I can see no particular spot on the label that is better than any other. However, when we have new labels printed the caution warning should be adjacent to the warranty statement in the lower middle section.

The following materials must carry the hazardous material caution label:

- All Commercial Papers and All Millboards
- Unsaturated Roofing Felt
- Unsaturated Glass Scrim Reinforced Flashing Membrane
- Unsaturated Pipeline Felt
- Armco Asbestos Paper
- Muffler Paper
- Section Paper

TRL/ei

Attachment

Ex.
N

8-6-11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

cc - Mr. [illegible]

cc - Mr. [illegible]

RE-STATE ASBESTOS FIBERS

THESE FIBERS ARE
"ASBESTOS FIBERS"
WARNING ON THE FIBERS.
I suggest:

① BORON A STAYS
FROM FIBER WILL OF
MILK. I. DEF. AND
STAYS THE FIBERS
ON EACH FIBER
WARNING.

② WARNING WITH
FIBERS TO HAVE
NO FOR "FIBERS"
FIBERS FIBERS
FIBERS TO US.
(SEE ATTACHED)

cc - Mr. [illegible]

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



1. LAMINATE - THIS IS THE
VOIDING - SIZE NOT SPECIFIED /
COULD BE SMALL WHEN PRINTED ON
A LABEL.

CAUTION
CONTAINS ASBESTOS FIBERS

AVOID C. ...

... CAUSE
SERIOUS ...

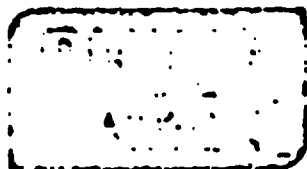
WE WILL HAVE OUR SUPPLY OF LABELS
ER-PRINTED - CAN BE DONE ANYWHERE
LABEL - DO YOU WANT TO PICK A STONE
FUTURE, LABEL PRINTING TO INCLUDE WARNING.

ROLL WEIGHT _____

WIDTH 18"—24"—36"

WARRANTY—We warrant our materials to be of
good quality and will replace material proved defective.
This warranty is in lieu of all others express or implied
and may not be extended by representatives, written
sales information or drawings. While we recommend
uses for our material based on tests believed reliable,
we in no way guarantee particular methods of use or
application or performance under special conditions.

STAND ON END • USE NO HOOKS



PHILIP CAREY COMPANY

INTERNAL CORRESPONDENCE

TO: O. A. Ciarrella - Linden Plant

DATE: July 17, 1972.

FROM: T. R. Larimer

CC: F. A. DiSalvo
L. J. Knipps
S. A. Sauerland

SUBJECT: CAUTION LABELS - ASBESTOS
PAPER AND MILLBOARD

Effective July 7, 1972, we were to commence labeling certain asbestos papers and all millboard packages with a caution warning regarding the alleged hazard experienced when working with asbestos fiber. The requirements have been elaborated in "Occupational Safety and Health Standards, Part 1910, Federal Register, Volume 37, No. 110." This states that the label shall be written as follows:

**"CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause
Serious Bodily Harm"**

The label is further described as follows:

" shall be printed in letters of sufficient
size and contrast as to be readily visible
and legible."

The following products require this label:

Commercial Paper
All Millboards
Unsaturated Roofing Felt
Unsaturated Glass Scrim Reinforced Flashing Membrane
Section Paper
Fyrex
Corrugated Asbestos Paper in All Forms, including
Aircell and Air Board
All Asbestos Papers, Foil One Side.

In general, it is my understanding that intra-company shipments, (roofing shipments to Perth Amboy and Celotex) do not require the label. The general criterion for the label requirement is this -

Materials with adequate binder (rubber latex, asphalt emulsion) or saturant, do not require a label. Those which do not have a substantial binder, and this includes starch, do require the cautioning statement.

Please contact me if you have questions in this matter.

(cont'd)

1.

TO: O. A. Cinaglia - Page 2

DATE: 7/19/72

FROM: T. R. Larimer

CC: E. A. DiSalvo
L.J. Knippa
S. A. Sauerland

SUBJECT: Caution Labels - Asbestos Paper and Millboard

These materials, whether in cut form, standard rolls, or bulk rolls, must carry the above caution label. The Lockland plant has prepared a stamp, copy attached, that will be used on non-labeled cartons or rolls. Standard rolls of Commercial Paper at the Lockland Plant are labeled. Every label will now carry the caution warning as a part of the standard imprint. I suggest that you have rubber stamps made which follow the Lockland format. The type size they have used appears to be appropriate for jumbo rolls and large cartons. I believe it is too large for the small packages and standard commercial rolls. You may wish to consider having a small curved label printed in approximately the size of the warranty statement that is circled on the attached copy.

TRL/el



TO: P. Romero DATE 7/21/72
AT: _____ TIME _____

PHONE OR PERSONAL CALL

- ☐ NUMBER
☐ PHONE HIM
☐ RETURNED CALL
☐ WILL CALL AGAIN

ATTACHMENTS
FOR YOUR:

- ☐ INFORMATION
☐ COMMENTS
☐ APPROVAL
☐ SIGNATURE

☐ PLEASE RETURN

ROUTE TO:

F. ROSENBERG
D. WRIGHT
J. CLEMENTS
C. HARRISON
C. WRIGHT

MESSAGE: WE'RE MOVING OUR STOCK
OF CARS FOR CAMP. USE.
PLEASE OVER-PRINTED. RUBBER
STAMPS FURNISHED TO MILL.
FROM: DEPT. 25 AND A/C.

FORM 8026 REV. 9/10/70

C.W.

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

THE CELOT-X CORPORATION

GENERAL OFFICE: P. O. BOX 22602 @ TAMPA, FLORIDA 33622

PLANT PURCHASE ORDER

P- 58574

ALL INVOICES AND DELIVERY TICKETS MUST BEAR THIS ORG. NO.

DATE Feb. 17 19 73

Hathaway Stamp Co.
627 Main St.
Cincinnati, Ohio 45202

SHIP TO

Celotex Corporation
320 S. Wayne Ave.
Lockland, Ohio 45215

MARK FOR Bldg. 28 - Seyfferle

IMPORTANT:
INVOICES MUST BE
FURNISHED AS
INDICATED

☒ ☐

SEND ORIGINAL INVOICE AND TWO COPIES TO THE CELOTEX CORPORATION AT DESTINATION OF SHIPMENT

SEND ORIGINAL INVOICE AND TWO COPIES TO THE GENERAL OFFICE OF THE CELOTEX CORPORATION IN TAMPA

TERMS Net 30 F. O. B. Delivered SHIP ON VIA RER/c:

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
2	Stamps - 5 Lines 1/4" letters To read as follows: CAUTION CONTAIN ASBESTOS FIBERS AVOID CREATING DUST BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM 5/29 = 2/20/73 @ 14.32	Advise	

TERMS AND CONDITIONS

- This order is subject to all terms and conditions printed on both sides hereof
- Send duplicate bill of lading to our plant or address above indicated
- Place our order number on each invoice, bill of lading and on all packages
- Time of delivery is important and must be strictly adhered to
- We reserve the right to cancel this order without expense to ourselves if not shipped on date specified or within a reasonable time if shipping date is not specified
- Acceptance of this order will constitute your representation that prices are in compliance with all applicable price schedules and regulations
- All transportation charges to be prepaid if sold f.o.b. destination
- For invoices subject to cash discount, a minimum of ten days after receipt of invoice is required

THE CELOTEX CORPORATION

H. B. CLEVELAND

VICE PRESIDENT OF PURCHASING AND TRAFFIC

C. D. FLETCHER, MANAGER OF PURCHASING

BY Robert E. Riley

ITEM	QUANTITY	UNIT PRICE	AMOUNT
	6000		
	505046		

COMMODITY

P- 58574

ORDER NUMBER

DATE Feb. 17, 73 REQ NO 232220

APPROVALS

DATE

DATE

GENERAL OFFICE: 1500 NORTH DALE MAEY • TAMPA, FLORIDA 33607
MAILING ADDRESS: P. O. BOX 22602, TAMPA, FLA. 33622

ALL INVOICES AND DELIVERY
TICKETS MUST BEAR THIS ORDER
NO

DATE May 31, 19 73

TO **Hillbore Printing Co.**
P. O. Box 2272
Tampa, Florida 33601

SHIP TO

The Celotex Corporation
320 E. Wayne Avenue
Cincinnati, Ohio 45125

MARK FOR Asbestos Mill

IMPORTANT:
INVOICES MUST BE
FURNISHED AS
INDICATED

☒ ☐

SEND ORIGINAL INVOICE AND TWO COPIES TO THE CELOTEX CORPORATION AT DESTINATION OF SHIPMENT
SEND ORIGINAL INVOICE AND TWO COPIES TO ABOVE MAILING ADDRESS OF THE CELOTEX CORPORATION IN TAMPA

TERMS Net 30

F. O. B. Delvd.

SHIP ON June 11, 1973

VIA East Mode

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
10,000	Labels 1/8" Roll Board Asbestos Paper Form 7035 Rev 6/73	\$21.25/M	
10,000	Labels 1/16" Asbestos Paper Form 7094 Rev. 6/73	\$1.25/M	
10,000	Labels for Asbestos Paper Form 7091 Rev. 6/73	\$1.25/M	
NOTE: Each Label must have the following statement: CAUTION - Contains Asbestos Fibers avoid creating dust, breathing asbestos dust may cause serious bodily harm. Print on Labels: Complies with air management regulation V, and the Celotex warranty. Confirming Phone Order of 5/30/73 To Bright Samuels. DO NOT DUPLICATE.			

TERMS AND CONDITIONS

- This order is subject to all terms and conditions printed on both sides hereof
- Send duplicate Bill of Lading to our plant or address above indicated
- Place our order number on each invoice, bill of lading and on all packages
- Time of delivery is important and must be strictly adhered to
- We reserve the right to cancel this order without expense to ourselves if not shipped on date specified or within a reasonable time if shipping date is not specified
- Acceptance of this order will constitute your representation that prices are in compliance with all applicable price schedules and regulations
- All transportation charges to be prepaid if sold f.o.b. destination
- For invoices subject to cash discount a minimum of ten days after receipt of invoice is required

THE CELOTEX CORPORATION
H. B. CLEVELAND
DIRECTOR OF PURCHASING AND TRAFFIC

B. F. Conway, Purchasing Agent

PURCHASE REQUESTED BY Lockland DIVISION
CHARGE ACCOUNT

DATE 5/4/73 REQ. NO. 249511

☒ INVOICE TO BE VOUCHERED AT
DESTINATION OF SHIPMENT

☐ INVOICE TO BE VOUCHERED AT
TAMPA GENERAL OFFICE

APPROVALS

DATE

DATE

RGG/ga

CAREY.

DELIVER TO, AND SEND INVOICE, IN THE NUMBER OF COPIES INDICATED, ALONG WITH THE ORIGINAL AND ONE COPY OF THE RATED BILL OF LADING, TO THE LOCATION BELOW, SHOWING THE "X".

XX LOCKLAND, OHIO 45213 INVOICE COPIES - 4	1510 Oreanda Rd. (P. O. Box 7254) MEMPHIS, TENN. 38107 INVOICE COPIES - 2	1414 E. Linden Ave. LINDEN, NEW JERSEY 07036 INVOICE COPIES - 2
Smith Street & Victory Bridge PERTH AMBOY, N. J. 08862 INVOICE COPIES - 2	1400 N. Post Oak Rd. HOUSTON, TEXAS 77024 INVOICE COPIES - 2	
	WILMINGTON, ILLINOIS 60481 INVOICE COPIES - 2	

PURCHASE RECORD

Hathaway Stamp Co.,
627 Main St.,
Cincinnati, O. 45202

No. 30-33018 PC

PLACE THIS PREFIX AND NUMBER ON ALL
CORRESPONDENCE, PACKAGES, BOXES, IN-
VOICES, AND BILLS. BOXES AND PACKAGES
SHALL ALSO SHOW YOUR NAME.

DATE 7-7-72	TERMS: 2-10-30	F. O. B. Delivered	DATE REQUIRED
REQ. NO. 28538	ACCOUNT NO. 6000.46	DEPARTMENT Plant Office/Soyfforle	RER/nga
ROUTE	IF RAIL DELIVERY IS SPECIFIED: LOCKLAND - BALTIMORE & OHIO PERTH AMBOY - CENTRAL OF N. J. HOUSTON - SOUTHERN PACIFIC		MEMPHIS - UNION BELT WILMINGTON - G. M. & O. LINDEN - S. I. R. T.

QUANTITY	DESCRIPTION	UNIT PRICE
4	Stamps - 5 lines 1/4" letters To read as follows: CAUTION CONTAINS ASBESTOS FIBERS AVOID CREATING DUST BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM Deliver to Receiving Dept.	600 Adverse Tatable

35621-1/10	Tap 1.08	2568
	Musling .60	
ACKNOWLED	Promised	INVOICE DATE
QUANTITY AND DESCRIPTION		INVOICE AMOUNT
		CAR INITIAL & NUMBER



INTER-OFFICE CORRESPONDENCE

*see that we are
doing this →*

*Hartke
Wright
Krieg* } *Sent
6/18/76
RN*

U. T. S.

JUN 18 1976

GENERAL OFFICE

June 14, 1976

D. T. Shirley
Lockland Plant

Asbestos Caution Label

G. Reynolds of our Legal Department has advised me that all industrial asbestos products (millboard, commercial papers, muffler paper, 7% natural rubber paper, Armco Paper, muffler paper, etc.) whether bulk-packed or in individual packages, cut-to-size or in full-size units, should carry the caution label which reads:

CAUTION

Contains asbestos fibers
Avoid Creating Dust
Breathing Asbestos Dust
May cause serious bodily harm

I believe you are doing this already but if not, please proceed immediately to do so. Thank you.

T. R. Larimer

TRLgf



INTER-OFFICE CORRESPONDENCE

D. T. Shirley
Lockland Plant

U. T. S.

JUL 12 1976

Handwritten: Hantke
Copy Sent 7/19/76
FU 7/24

GENERAL OFFICE

July 15, 1976

Product Liability

Please send me a sample label containing the health hazard warning for each industrial asbestos product shipped from the Lockland plant including Commercial Papers, Armco Paper, Muffler Paper cut and in rolls, 7% Natural Rubber Asbestos Paper, and Millboard in sheets and cut pieces. These are needed for a meeting of the Product Liability Committee to be held on August 3, 1976, so I will need the labels before this date. Thank you.

T. R. Larimer

TRL/gf

cc: E. A. DiSalvo
R. G. Merriman
R. Milhoan
R. S. Miller

D. T. S.

JUL 22 1976

July 21, 1976

M. Hartke
Lockland Plant

Asbestos Warning Statement

Confirming our July 20, 1976 telephone conversation, you are sending me one of the black and white hazard warning labels printed and used by the Lockland Plant prior to incorporation of the warning in the various Commercial Paper and Millboard labels. This will be reviewed by the legal department for acceptability of lettering size and prominence only.

After size approval is obtained you may then proceed to have new labels of similar size printed using the wording prescribed in specification O-9-1-1, dated July 12, 1976 subject: Asbestos Warning Statement.

The new labels will then be glued onto some conspicuous area of each individual roll, package or other container of industrial asbestos materials, being shipped to our customers, that does not already have a standard label. Standard labels for Commercial Asbestos Papers are now being revised.

The new warning must also be placed on the Millboard cartons procured by Lockland Plant purchasing. Revision of the warning statement on these cartons should be made immediately. If we have a substantial quantity on hand it may be possible to use the new label on these cartons to avoid scrapping them, but please use the new warning statement on all cartons ordered henceforth.

T. R. Larimer

TRL/gf

cc: R. Milhoan
D. Shirley



INTEROFFICE CORRESPONDENCE

LOCKLAND PLANT

D. T. S.

July 22, 1976

JUL 23 1976

To: T. R. Larimer - Tampa Marketing

From: M. Hartke - Lockland

Subj: Asbestos Warning Statement

Under separate cover (mailed today) I have sent you samples of labels and stickers used on our asbestos products. Included is the black and white "Caution" label used prior to the incorporation of the warning on our labels.

Please let me know if you require anything in addition. We have a label machine at Lockland that can print a label 5" x 8" or any size in between.

M. Hartke

cc: E. A. DiSalvo
D. T. Shirley ✓
R. G. Merriman
R. Milhoan

U. T. E.

JUL 27 1976

July 22, 1976

R. P. Milhoan
Advertising Department

ASBESTOS WARNING STATEMENT

The asbestos task force has recently recommended the following statement should be placed on each product shipped of asbestos fiber or asbestos fiber containing product.

"This product is (asbestos fiber) or (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."

According to my records, the following industrial insulation accessories contain asbestos:

Thermotex B
Insulation Seal
Fibrous Adhesive
7M-20 Asbestos Short
Insulation Cement
Fireclad Jacketing

Please review our current labeling methods and coordinate with Lockland to have above statement indicated on those products containing asbestos or asbestos fiber.

If I can be of any assistance regarding this project, please advise.

Karl W. Holm

th

cc: H. Finn, Lockland
D. Shirley, Lockland
M. Interian, Tampa

EXHIBIT O

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
SUBJECT <u>RECORDS RETENTION</u>		DISTRIBUTION B & E	
		SUPERSEDES Book 1 Part 4 Section 2	DATED 7/1/71
		DATE ISSUED April 8, 1976	PAGE 1 OF 8

I. POLICY

Records shall be retained only as long as they serve a necessary business purpose or are required by law.

(Because state retention statutes vary widely on tax, unemployment, and workmen's compensation records, each operating unit should check with the Tax Commissioner of the state(s) in which it does business for specific details.)

II. PURPOSE

To establish the procedure for retention and destruction of records.

III. DEFINITIONS

- A. Operating Unit - The general headquarters of each plant, division and/or subsidiary that constitutes Celotex Corporation.
- B. Record - A document used to record, analyze or report the business transaction of the Company.
- C. Storage - Housing of records in other than active files.
- D. Years - The period of time a record is to be retained for legal or corporate reasons. This period is in addition to the fiscal year in which the particular transaction, document or property expires or is completed, settled, cancelled, terminated, disposed of, refused, etc., as applicable.

IV. PROCEDURE

- A. Current Transactions - Records of transactions not closed will be retained for the prescribed period after close of transaction.
- B. Correspondence - Correspondence will not be retained longer than necessary and in no case for more than one (1) year unless it is part of a record to be retained for a longer period.
- C. Active Files - Records scheduled for retention shall be transferred from active files into storage not later than seven (7) months following the end of the fiscal year in which the transaction is completed.

Exceptions to this rule may be made if a useful business purpose is regularly served by deferring transfer.

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
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		DATE ISSUED April 8, 1976	PAGE 2 OF 8

IV. PROCEDURE (Continued)

D. Storage Containers

1. Records being transferred to storage for a period of less than ten (10) years are to be contained in serially numbered cardboard transfer files, either letter or legal size as required.
2. Records being transferred to storage for a period of ten (10) years or more are to be contained in either serially numbered fireproof files or a vault.

E. Records Identification - Each storage file is to be externally, prominently, and clearly identified with a permanent record of:

Name of department and location originating the file
File number
File contents
Period covered by contents
Scheduled destruction date or marked "Permanent" if so scheduled.

Waterproof, fade resistant paint, fade resistant marker and stencils are to be used for identification purposes. Gummed labels or other adhesives are not acceptable due to their lack of performance.

F. Storage Facilities - Each location shall designate a storage area for those records scheduled for retention. Storage space is to be protected against disturbance or intrusions by unauthorized persons and against fire, flood, heat, mildew, excessive dirt and other factors which cause undue deterioration.

G. Records Retention Storage Log - Each location shall establish and permanently maintain a log for the purpose of identifying individual files as to:

Storage location (building & room)
Row or aisle number
File number
Type of file (letter or legal, cardboard or metal)
Title or brief description of contents
Scheduled destruction date
Actual destruction date.

H. Unlisted Records - Records not listed in Part V of this policy should be retained only as long as they regularly service a necessary business purpose. If it seems appropriate to establish a retention schedule for an unlisted record, a

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
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		SUPERSEDES Book 1 Part 4 Section 2	DATED 7/1/71
		DATE ISSUED April 8, 1976	PAGE 3 OF 8

IV. PROCEDURE (Continued)

I. Destruction

1. Each location is responsible for destruction of its own records.
2. Records are to be destroyed by incineration, shredding, or other positive means on expiration of the specified retention period, unless a written request has been received from the applicable department manager, approved by the operating units chief financial officer, specifying a longer retention.

V. RETENTION SCHEDULES

A. Finance

	<u>Years</u>
1. Accounts Payable Invoices:	
a. Regular	3(A)
b. Capital Asset	3(AD)
2. Accounts Receivable Ledger Cards	3
3. Accounts Receivable - Bad Debts	7(A)
4. Audit Reports - External	P
5. Accounts Receivable Agings	3
6. Bank Account Reconciliations	3(A)
7. Bank Deposit Slips	3(A)
8. Capital Project Authorizations	3(AD)
9. Capital Asset Register	P
10. Cash Disbursements Journal	P
11. Cash Receipts Journal	P
12. Checks - Cancelled	3(A)
13. Credit Memos	7
14. Cost Records	7
15. Costs - Standard	7
16. Depreciation Records	P
17. Employee Earnings Record	7
18. Employee Travel Expense Records	3(A)
19. Employee Relocation Expense	3(A)
20. Financial Statements:	
a. Certified	P
b. Interim	3(A)
c. Year-End	3(A)
d. Work Papers	3(A)
21. General Ledger	P
22. General Journal Entry	P
23. General Journal Entry Support Data	3(A)
24. Income Tax Returns	P
25. Income Tax Return Work Papers	3(A)
26. Inventory Summary & Work Papers:	
Interim	3(A)

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
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V. RETENTION SCHEDULES (Continued)

A. Finance (Continued)

	<u>Years</u>
27. Payroll:	
a. Journal	P
b. Register	P
c. Tax Returns	7
d. Bond Purchase Records	7
28. Petty Cash Vouchers	7
29. Notes Receivable	3(AS)
30. Royalty Reports	7
31. Sales:	
a. Contracts	7
b. Invoices	7
c. Journal	P
d. Order	7
e. Tax Exemption Certificates	P
f. Tax-Monthly Work Papers	7
g. Tax Return	7
32. Subsidiary Ledgers	P

B. Data Processing

1. Machine-sensible data media used for recording, consolidating, and summarizing accounting transactions and records that may become material in the administration of any Internal Revenue Law.

3(A)

Typical of such data media are:

Punched cards (*)
Magnetic Tapes
Discs
Paper Tapes (*)

- (*) An exception is provided which makes it unnecessary to retain punched cards or other media which are used merely as a means of input to the system and the information is duplicated on magnetic tapes, discs or other machine sensible records.

2. System flow charts and documentation

P

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
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V. RETENTION SCHEDULES (Continued)

C. Employee Relations

	<u>Years</u>
1. <u>Recruiting & Selection</u>	
a. Application for Employment:	
1. No interview	1
2. If interviewed, including interviewer's comments	3
3. If hired	10(AT)
b. EEOC Records and Reports	P
c. Advertisements for employment	2
d. Affirmative Action Plans/Programs	P
e. Turnover Reports	P
f. Veteran's Reemployment Data	P
2. <u>Labor Relations</u>	
a. Contract Negotiations	
After 10 years purge file and retain	
1. Minutes	P
2. Cost detail of final settlement	P
3. Letters outlining final settlement	P
4. Copies of company offers	P
5. Union's original demands	P
b. Union Agreements (signed documents)	P
c. Union Agreements (printed copies)	3(AT)
d. Grievance Records	P
e. N.L.R.B. Proceedings	P
f. Minutes of Labor/Management Meetings	P
3. <u>Personnel Records</u>	
a. Employee Records/Personnel Files	
1. Change in status notices	10 AT
2. Termination Notices	10 AT
3. Deduction Authorizations	10 AT
4. Contracts	10 AT
5. Time Cards	3 A
b. Garnishments	10 AT
c. Patentright Protection Contracts	10 AT
4. <u>Employee Benefits</u>	
a. Accident Report, Injury Claims, Settlement	3
b. Occupational Injury Frequency Data	P
c. Profit Sharing Plan Records	P

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V. RETENTION SCHEDULES (Continued)

C. Employee Relations (Continued)

Years

- d. Retirement/Pension Plans P
- e. O.S.H.A. Records and Reports P
- f. Employee Newsletters/Magazines P
- g. Employee Solicitations for Charitable Causes
 - 1. United Fund 2
- h. Suggestion Systems P
 - 1. Suggestion System Records 10
- i. Stock Purchase Plan P
 - 1. Stock Purchase Plan Records 10(AT)
- j. Educational Assistance Plan P
 - 1. Educational Assistance Plan Records 3
- k. Scholarship Program P

5. Compensation Administration

- a. Salary Administration Records P
 - 1. Position Descriptions
 - 2. Policies & Procedures
 - 3. Salary Ranges
- b. Unclaimed Wages 7
- c. Wage and Benefit Surveys 5

6. Training & Development

- a. Training and Development Programs P
 - 1. Training Program Records-Appraisals 3

7. Miscellaneous

- a. Organization Charts 3
- b. Rules of Conduct - Safety Rules P
- c. Disciplinary Action Records P
- d. Wage, Equal Employment, Health & Safety Bulletins (Required to be posted by Government) S

D. Legal Records

- 1. Claims & Litigation Concerning Torts & Breach of Contract P
- 2. Contracts, Bailments, Changes, Specifications, Procedures P
- 3. General Agreements 20(AT)
- 4. Patent & Related Material 20
- 5. Trademarks & Copyrights P

THE CELOTEX CORPORATION FINANCE DEPT. POLICY STATEMENT		DATE EFFECTIVE IMMEDIATELY	PROCEDURE NUMBER 01-11-00
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V. RETENTION SCHEDULES (Continued)

E. Purchasing Records

	Years
1. Bids, Awards	3(AT)
2. Capital Equipment Purchase Orders	3(AD)
3. Contracts	3(AT)
4. Purchase Orders	3(AT)
5. Purchase Order Requisitions	3(AT)
6. Quotations	1

F. Traffic Records

1. Aircraft Operating & Maintenance	P
2. Bills of Lading	2
3. Driver Reports	3
4. Export Records	3
5. Freight Claims	3(AS)
6. Freight Bills	3
7. Rates & Tariff	S
8. Receiving Documents	2-10
9. Routing	3
10. Shipping & Related Documents	2-10
11. Waybills	2

G. Engineering/Manufacturing Records

1. Bills of Material	2
2. Drawings & Drafting Records	P
3. Product, Tooling, Design, Engineering Research Experiment & Specification Records	20
4. Stock Issuing Records	3
5. Tool Control	3

H. Corporate Records

1. Annual Reports	P
2. Charter & By-Laws	P
3. Cancelled Stock Certificates	7
4. Contracts & Agreements	20(AT)
5. Daily Stock Transfer Sheets	P
6. Fidelity Bonds, Surety Bonds	3(AT)
7. Incorporation Records	P
8. Leases	7(AT)
9. Licenses	C
10. Minutes	P
11. Mortgages	7(AT)
12. Notes-cancelled	7(AS)
13. Option-After Expiration or Refusal to Exercise	1
14. Property Deeds	P
15. Real Estate Titles	P

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V. RETENTION SCHEDULES (Continued)

H. Corporate Records (Continued)

- 16. Stock Ledgers
- 17. Stockholders Lists
- 18. Stockholder Proxies

Years

P
7
3

I. Other Records

- 1. Directives from Officers
- 2. Forms Used, File Copy
- 3. Price Bulletins
- 4. Systems & Procedures Records
- 5. Warranties

(S)

P

3

P

3(AT)

Legend:

A - After income tax returns for the year to which the papers relate have been examined.

AD - After Disposal

AS - After Settlement

AT - After Termination

C - While Current

P - Permanent

S - Until Superseded



MARKETING PROCEDURE

Number R101a

April 1, 1981

(Supersedes R101 dated
May 25, 1977)

RECORD RETENTION

PURPOSE:

To supplement the Finance Record Retention Policy 01-11-00, dated 4/8/76, concerning specific records used for normal business purposes by marketing, regional sales offices, and plant sales order groups.

GENERAL:

Other records not listed should be retained only as long as they are required for normal business purposes.

PROCEDURE:

1. Retain records based on the retention schedules listed in the Finance Policy and the attached supplement.
2. Records retained beyond the published retention schedules must be authorized in writing by the corporate legal department.


G. M. Muhr, Manager
Marketing Administration

bg

Attachment: Supplement to Finance Procedure 01-11-00

DISTRIBUTION:

All Regional Sales Office Supervisors (10)
All Regional Sales Managers
All Field Sales Managers
All Plant Managers
All Plant Controllers
All Plant & Warehouse Sales Order Groups (Index #36)
J. Freeman - Legal Dept.
L. Meirase - Legal Dept.
M. Fisher - General Files
Tampa Interoffice #12

SUPPLEMENT TO FINANCE PROCEDURE 01-11-00

	<u>MARKETING ADMIN. TAMPA</u>	<u>REGIONAL SALES OFFICE</u>	<u>PLANT SALES ORDER</u>
1. Price lists, quotations, Requests for Exception to Price or Conditions of Sale-Forms 350 & 360, Request for Non-Standard Pricing or Special Condition of Sale-Form 330, Special Acoustical Product Request-Form 30, and customer trade classification forms.	4 AT	1 AT	1 AT
2. Copies of orders placed by customers for shipment from our plants.	-	-	2
3. Copies of orders placed by customers for entry with outside suppliers.	-	2	-
4. Copies of invoices, requests for credit, and credit memos.	-	2	-
5. Copies of allowed and collectable RDs.	-	2	-
6. Internal correspondence; messages and memos (formal and informal) including correspondence with field representatives.	1	1	1
7. Departmental systems and procedures.	P	S	S
8. Work papers and copies of plans and budgets of operations.	2	1	1
9. Copies of Territory Assignment Sheets.	10	C	C
10. Copies of data processing reports.	1	1	1
11. Copies of settled complaints (Non-Bonded).	-	1 AS	-
12. BUR Job Files cancelled prior to bonding.	-	6 AT	-
13. BUR Bond Files including service and inspection records.	-	1 AT	-
14. Copies of new customer forms, Customer Data, New Account - Form 728, Customer Code Request - Form 686, and Blanket Certificate of Exemption From Sales Tax - Form 711.	-	C	-
15. Customer Control Cards - Form 83.	-	C	C

IN THE CIRCUIT COURT FOR BALTIMORE CITY

*

* ALL CT-1 CASES

* ALL CT-2 CASES

* ALL CT-4 CASES

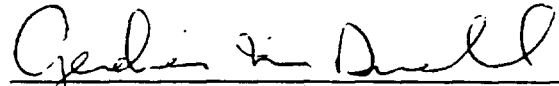
* ALL CT-5 CASES

*

* * * * *

CERTIFICATE/NOTICE OF SERVICE

I HEREBY CERTIFY that on this 5th day of May, 1988,
Defendants Owens-Illinois, Inc., Keene Corporation, The Celotex
Corporation and Armstrong World Industries, Inc., sent their
Answers to Plaintiffs' Master Interrogatories by hand-delivery or
first class mail, postage prepaid, to the following parties:



Gardner M. Duvall
Whiteford, Taylor & Preston
Signet Tower - Suite 1400
Seven Saint Paul Street
Baltimore, Maryland 21202-1626
(301) 347-8700

WILLIAM D. KURTZ ESQ.
VERDERAIME & DUBOIS, P.A.
1231 N. CALVERT ST.
BALTIMORE, MARYLAND 21202

ATTORNEY FOR PLAINTIFF

RICHARD M. BADER ESQ.
114 E. LEXINGTON STREET
SUITE 700
BALTIMORE, MARYLAND 21202

ATTORNEY FOR PLAINTIFF

PETER G. ANGELOS ESQ.
LAW OFFICES OF PETER G. ANGELOS
5905 HARFORD ROAD
BALTIMORE, MARYLAND 21214

ATTORNEY FOR PLAINTIFF

HARRY GOLDMAN JR. ESQ.
7 N. CALVERT STREET
1123 MUNSEY BUILDING
BALTIMORE, MARYLAND 21202

ATTORNEY FOR PLAINTIFF

JOHN T. ENOCH ESQ.
GOODMAN, MEAGHER & ENOCH
111 NORTH CHARLES STREET
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Gardner M. Duvall

THE PHILIP CAIRN MANUFACTURING CO.

LOCHLAND PLANT
November 6, 1944

SAFETY BULLETIN #3

ALL SUPERVISION

RESPIRATORS

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

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

We have obtained what we think is the best possible respirator on the market that will do the job we have to do here. Each one has been approved by the U. S. Bureau of Mines and their approval number is stamped on each one. But regardless of how good it will do the job -- it won't do it hung around the 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 work without one. When we investigate the complaint we find that it is being worn too high, too low, too loose, too tight, or the filter needs changing. Some operations will necessitate the changing of the filter daily. These can all be corrected.

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

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

The Safety Supervisor will assist you in every possible manner.

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

Did you ever watch a baseball game and note all the paraphernalia the catcher wears? That is SAFETY EQUIPMENT ----- and he WEARS IT FOR FUN --- and LIKES TO.

H. W. Drunk
Safety Supervisor