

M E M O R A N D U M

**TO:** TRANSITE PIPE PRODUCT FILE (P-197)  
**FROM:** LKB  
**DATE:** June 26, 1990  
**RE:** TYPE AND PERCENT OF FIBER IN TRANSITE CONDUIT AND KORDUCT

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Pursuant to a request from Mr. Yoeli of Gordon and Silber, I attempted to determine the fiber types and percentages in Conduit and Korduct. I first spoke with Tom Sadler, Manville Research and Development, on June 8, 1990, and he stated the following:

Generally, Transite Conduit and Korduct contained between 10 to 12 percent asbestos fiber. Of that fiber blend, approximately ten percent was crocidolite for a total of one to one and one-half percent crocidolite in the total product. The remaining fiber was chrysotile.

I subsequently spoke with Jack Cran, former Manville Transite Pipe Department employee, and he stated as follows:

There was very little asbestos fiber used in the manufacture of Transite Conduit and Korduct--approximately ten percent chrysotile. No crocidolite was ever used.

A conversation with Bill Streib, former Manville R&D employee, failed to resolve this dilemma. Therefore, with Mr. Streib's assistance and using the Transite Pipe fiber blend books and manufacturing specifications, I calculated the types and percent of fiber used in Transite Conduit and Korduct for all years in which I was able to obtain both fiber blend formulations and furnish requirements. The results are attached and are summarized as follows:

1. Total Fiber Range: 6.6% - 16.5%
2. Range of Blue Fiber: .02% - 4.45%
3. Range of Chrysotile: 5.4% - 15.12%
4. Range of Amosite (1953 and 1954): 4.0% - 4.7%

I will supplement this memorandum when additional manufacturing specifications and furnish requirements become available.

# RESEARCH REQUEST

Initials: LKB Assigned to: LKB  
 Date/Time: 10:10 am ; 6/7/90 am/pm  
 Name of Requestor: Michael Yoeli Phone: ( ) Speed 61  
 Representing: Gordon & Silber  
 Case Name/State: NY

Information Requested: Types & percent of asbestos in Transite Conduit from 1950's →.

Date Required: ASAP (Trial 6/11)

## Notes:

T/C with Tom Sadlet, Manville R.D.,  
 6/8/90: Generally, Transite Conduit  
 or Korduct contained between 10-12%  
 asbestos fiber. Of that fiber blend,  
 approximately 10% is crocidolite  
 at 1-1 1/2%. (The remaining fiber  
 blend is chrysotile.)

T/C Jack Chan 6/12/90: Very little  
 fiber in Transite Conduit and Korduct;  
 approx. 10% chrysotile - no crocidolite.  
 See memo to file attached.

Date Finished: 6/26/90

Existing File? ☒ (Y) or N Existing File Name: Transite Pipe

New File Name: \_\_\_\_\_ Number: P-197

15.05  
14.9  
9.5  
9.1  
9.08  
8.03  
7.44  
6.6  
10.3  
8.31  
12.49  
10.3  
16.50  
14.9  
15.5  
14.9  
15.55  
14.9  
15.46  
15.12  
15.25  
15.46  
15.46  
14.0

total fiber range:

6.6% - 16.5%

range of blue fiber

.02% - 4.45%

range of chrysotile

5.4% - 15.12%

range of amosite  
(1953 - 1954)

4.0% - 4.7%

Blue + Chrysotile

1940

1941-44

1947

10/49-7/50

1958

1959

1960

1961

1962

Chrysotile + Amosite

1977

Chrysotile only

1948-49

9/51 → 1956

10/62

10/66

1969-1975

1977

Chrysotile only OR Blue + Chrysotile

3/51

10/51

1952

Chrysotile + Amosite OR Chrysotile + Blue OR  
Chrysotile Only

1953

1954

## Kor duct

1940 3.5% blue  
12.0% chrysolite

1941- 3.5% blue  
1944 6.0% chry.

1948- 9.08% chry.  
1949

4/49 1.24% blue  
6.2% chry.

10/49-  
7/50 .9% blue  
9.4% chry.

1950 1.09% blue  
11.4% chry.

.9% blue  
9.4% chry.

4.45% blue  
12.05% chry.

## Conduit

3.4% blue  
11.5% chry.

3.3% blue  
5.8% chry.

8.03% chry

1.2% blue  
5.4% chry

.02% blue  
8.29% chry

Korduct

3/51

14.9% chry.

3.45% blue

12.05% chry.

10/51

14.9% chry.

3.5% blue

12.05% chry.

1952

14.9% chry.

3.45% blue

12.01% chry.

15.12% chry.

1953

10.55% chry.

4.7% ~~blue~~ amosite

3.45% blue

12.01% chry.

1954

3.45% blue

12.01% chry.

4% amosite

10% chry.

## Korduct - 1940

15.04% scrap } ~~wash~~ product  
15.5% fiber }

~~tot~~ 50.9% fiber } blend

3.5% blue

12.0% chrysotile

## Conduit - 1940

14.5% scrap } product  
14.9% fiber }

50.9% fiber in blend

3.4% blue

~~11.2%~~ chrysotile  
11.5%

## Korduct - 1941 - 1944

21.05% scrap } product  
9.5% fiber }

31% fiber in blend

3.5% blue

6.0% chrysotile

Conduit 1941-1944

20.3% scrap } in product  
9.1% fiber }

31.0% fiber in blend

3.3% blue

5.8% chrysotile

~~Conduit~~  
Rorduct 1948-49

55.6% scrap }  
(.50 + .056) } in prod.  
9.05% fiber }

31% of blend is fiber

9.08% chrysotile

Conduit 1948-49

31% of blend is fiber

8.03% of prod = chrysotile

Korduct 4/49

7.3% scrap } in prod.  
7.4% fiber }

25% total fiber in blend

~~5.5% blue~~  
1.24% blue  
6.2% chrysotile

Conduit 4/49

6.48 scrap  
6.47 fiber - in product

25.0% total fiber in blend

1.2% blue  
5.4% chrysotile

Korduct 10/49 - 7/50

4.4 scrap  
10.3 fiber in prod.

~~32.9%~~ 35.05% total fiber in blend

.9% blue  
9.4% chrysotile

Conduit 10/49 - 7/50

3.87% scrap +.50

9.08% fiber in prod.

35.05% fiber in blend

.02% blue

8.29% chrysotile

Korduct 1950

C-104

4.4% scrap

12.5% fiber in prod.

35.05% fiber in blend

1.09% blue

11.4% chrysotile

C-106

4.4% scrap

10.3% fiber in prod.

35.05% fiber in prod.

.9% blue

9.4% chrysotile

C-111

15.04 scrap

15.5 fiber in pro

~~39.9%~~ fiber in ble  
50.7%

4.45% blue

12.05% chrysot

Korduct 3/51

C-118

14.4 % scrap  
14.9 % fiber in prod

~~51 % fiber in blend~~

14.9 % chrysotile

C-111

15.04 scrap  
15.5 % fiber in prod.

50.7 fiber in blend

3.45 blue  
12.05 chrysotile

Korduct 10/51

C-121

14.9 % chrysotile

C-111

15.04 % scrap  
15.5 % ~~fiber~~ fiber in prod.  
50.7 % fiber in blend

3.5 % blue  
12.05 % chrysotile

Korduct 1952

C-121

14.9% chrysotile

C-111

15.04 % scrap

15.46 % fiber in prod.

50.7% fiber in blend

3.45% blue

12.01% chrysotile

C-118

~~15.04%~~

15.12% chrysotile

Korduct 1953

C-158

14.06% scrap

15.24% fiber in prod.

52% fiber in blend

10.55% chrysotile

4.7% amosite

C-111

~~30.07%~~ scrap  
15.04% scrap  
15.46% fiber in prod.  
50.7% fiber in blend  
3.45% blue  
12.01% chrysotile

Kor duct 1954

C-111

3.45% blue  
12.01% chrysotile

C-158

12% scrap  
14% fiber in prod.  
52% fiber in blend  
10% chrysotile  
4% amosite

## AFFIDAVIT

STATE OF COLORADO                    )  
                                                  ) ss.  
COUNTY OF ADAMS                    )

I, Margaret J. Baumgardner, being of full age and first duly sworn do hereby state:

1. I am not a party to this action. I have personal knowledge of the facts set forth in this affidavit, and if called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I am the Research Coordinator for the Claims Resolution Management Corporation ("CRMC"), a wholly owned subsidiary of the Manville Personal Injury Settlement Trust ("Trust"). The CRMC was created in December 1998 and is staffed by former Trust employees. On January 1, 1999, CRMC began providing claims resolution facility services to the Trust.

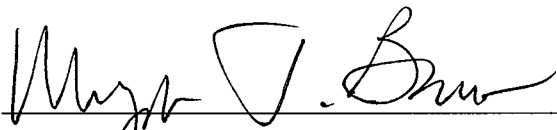
3. In this position, I manage the Asbestos Claims Research Facility ("Facility"), a document and records repository located at 3390 Peoria Street, Suite 304, Aurora, Colorado. The Facility contains the business records including but not limited to correspondence, memoranda, reports, records and data compilations ("record") of Manville Corporation or related entities ("Manville"), generally, as well as Manville records relevant to litigation of asbestos liability. The Trust has managed and operated the Facility from November 28, 1988, the date on which the Manville bankruptcy plan was consummated.

4. My experience and familiarity with the documents at the Facility began in 1983 while working for Manville. In my work as a paralegal for Manville, I assisted in locating, indexing and packing many of the records which became the foundation documents for the Facility. I continued to work for Manville until September 1987. From March 1988 to September 1988, I was hired to supervise and assist in the indexing of the first 20,000 boxes which were turned over to the Trust in November 1988. From September 1988 to January 1989, I assisted in the privilege review of documents to be given to the Trust. From November 1988 to April 1994, I worked for Freeborn & Peters and was put in charge of the Facility, managing all productions and "new" acquisitions. In September 1995, I was hired by the Trust to manage the Facility. In December 1998, I was hired by

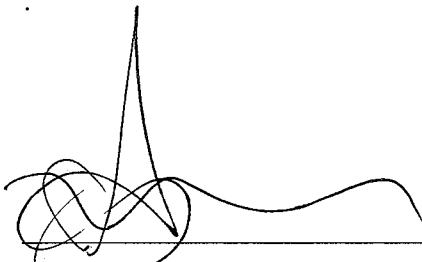
the CRMC to manage the Facility for the Trust. Accordingly, I am personally familiar with many of the records stored at the Facility, as well as how the records have been gathered.

5. To the best of my knowledge, information and belief, I certify that these records were made at or near the time by, or from information transmitted by, a person with knowledge, were kept in the course of the regularly conducted business activity of Manville, and it was the regular practice and the business activity of Manville to make the records.

6. Attached are documents found among the file and microfilm box collections at the Facility. These documents, bates labeled CRMC-SBGAB-ConduitPipe-000001 through CRMC-SBGAB-ConduitPipe-000092, are true and correct copies of documents found at the Facility.

  
Margaret J. Baumgardner

Subscribed and sworn to before  
me this 16<sup>th</sup> day of May, 2014.

  
Notary Public

**AMY W BENHAM**  
**NOTARY PUBLIC**  
**STATE OF COLORADO**  
MY COMMISSION EXPIRES 05-23-2016