

To: Kip Johnson

Date: May 7, 1975

From: F. T. Petersen *288*

Copies: W. A. Sells, E. M. Fenner, E. J. Mitchell, File, Chrono

Subject: VELASQUEZ VS. JOHNS MANVILLE PRODUCTS ET AL
INTERROGATORIES**PLAINTIFF'S
EXHIBIT**

JMMC-166

Please refer to your subject letter to Mr. Sells dated 4/31/75.

As I advised, Long Beach is a multi Division location and we will answer these interrogatories covering only the Transite Pipe operation at that location. The Industrial Products Division (Mr. Stoddard Lane) should cover the Insulation Plant and the cut gasket plants which are or were also located at Long Beach.

My answers to the various circled interrogatories based on Transite Pipe operations are as follows:

B.1. Yes. We manufacture Transite Pipe which contains asbestos.

B.1. (a) We produce Transite Pipe at two plants in California; one at Long Beach and one at Stockton. In addition, we currently produce Transite Pipe at the following locations:

- ✓ Long Beach
- ✓ Manville, New Jersey
- ✓ Waukegan, Illinois
- ✓ Denison, Texas
- ✓ Green Cove Springs, Florida
- ✓ Stockton

✓ We produced Transite Pipe at Marrero, Louisiana from 1947 to 1970. This location has been shut down since:

We know positively that our Waukegan Plant shipped into California. All of the other plants could have shipped Transite products into California at one time or another. As an example, I recall Green Cove shipping Super Temp Tite which has a Transite Caping into California. Please note that other than Waukegan shipments from the other plant into California would have been minimal due to the high freight involved.

**PROVIDED
J-M 83**

May 7, 1975

- B.1. (b) The operating period for each location is as follows:

	<u>Start</u>	<u>Current</u>
Waukegan, Ill.	1929	Still operating
Manville, N. J.	1936	" "
Long Beach, Calif.	1938	" "
Marrero, La.	1947	Closed 1970
Stockton, Calif.	1957	Still operating
Denison, Texas	1957	" "
Green Cove Springs, Fla.	1965	" "

- B.1. (c) Persons in charge of each location including present addresses and tenure.

Manville

1943 - 1949	P. D. Cannon - Deceased
1950 - 1956	H. J. O'Brien - Deceased
1956 - 1957	A. H. Schilling - Deceased
1957 - 1959	W. L. VanDerbeek The Polo Club 3131 E. Alameda Ave. Denver, Colorado 80209
1960 - 1969	H. Engel 5111 West Portland Drive Littleton, Colorado 80123
1970 - 1972	J. R. Cran 7105 S. Depew St. Littleton, Colorado 80123
1972 - 1973	W. A. Sells 31370 Brookline Road Evergreen, Colorado 80439
1973 to current	R. F. Henry 413 Mountainview Terrace Dunellen, New Jersey 08812

PRIVILEGED
J-M 83

May 7, 1975

Long Beach

1938 - 1954 J. A. Carey - Deceased
1955 T. H. Eaton
304 East Dudley Ave.
Westfield, New Jersey
1956 - 1972 A. Harris
12671 El Roy Drive
Santa Ana, California 92705
1972 to present W. A. Ford
9751 La Cresta Circle
Huntington Beach, Calif. 92648

Stockton

1957 - 1964 A. H. Schilling - Deceased
1964 - 1970 D. R. Thomas - Deceased
1970 to present W. E. Volwiler
3734 Portsmouth Circle No.
Stockton, Calif. 95207

Marrero

1947 - 1953 R. B. Murphy - Deceased
1953 - 1955 T. H. Eaton
304 East Dudley Ave.
Westfield, New Jersey
1955 - 1968 J. W. Miles
600 Gordon Ave.
Harahan, La.
1968 - 1970 L. E. Inguagiato
16 Gelbke Drive
Gretna, La. 70053
1970 to closing 1971 E. J. Riley
136 S. Highway Drive
New Orleans, La.

PRIVILEGED
J-M 83

May 7, 1975

Denison

1957 - 1964	J. E. Hesse 5256 E. Princeton Ave. Englewood, Colorado
1964 - 1972	G. C. Eggleston 6022 S. Willowbrook Dr. Rte. #1, Box 718 Morrison, Colorado
1972 - 1975	D. W. French 1510 West Heron Denison, Texas 75020

Green Cove Springs

1965 - 1966	J. E. Hesse 5256 E. Princeton Ave. Englewood, Colorado
1966 to present	G. E. DeLong 10 Southwind Circle St. Augustine, Florida

Waukegan

1943 - 1947	C. R. Wikel 318 Ravine Forest Dr. Lake Bluff, Ill.
1947 - 1955	T. R. Turnbull - Deceased
1956 - 1970	J. L. Miller 1470 Central Avenue Merritt Island, Fla. 32952
1970 - 1971	E. V. Paddock 2868 Heather Road Long Beach, Calif.
1971 - 1973	W. A. Sells 31370 Brookline Road Evergreen, Colorado 80439
1973 to present	

PRIVILEGED
J-M 83

May 7, 1975

- B.2. (a) We have no record or knowledge that J-M ever maintained or operated any distribution points in California other than at the two Transite Pipe plants identified above (Long Beach and Stockton).
- B.2. (b) We did supply Transite Pipe products to others for shipment or sale in California. We can provide a current (1975) list of such distributors. However, we have no records which would enable us to provide a complete (or even a partial) listing for the entire period involved (1/1/43-1/31/74). Undoubtedly, some past distributors could be identified based on the recollections of members of the Sales Department.
- B.3. (a) We sell and have sold over the past 30 years a broad variety of Asbestos Cement Pipe products all under the overall trade name of "Transite" Pipe. All of these products had the same general characteristics but differed in formula, diameter length, end configuration, joining method, etc. A partial list of these products is as follows:

Water Pipe
Sewer Pipe
Transmission Pipe
Telephone Duct
Conduit & Korduct
Small Diameter
Air Duct
Industrial Vent Pipe (Vent Duct)
Temp Tite
Super Temp Tite
Cable Trays
Storm Drain
Gas Vent
On Farm
Well Casing
Irrigation for USBR

I have omitted any information re. the contents question in line with the marginal note.

PP-100-ED
J-M 83

May 7, 1975

B.3. (b) To the best of my knowledge all of the Transite Pipe produced between 1/1/42 and 1/21/74 was made with Chrysotile asbestos. I recall that some experimental work was done with Amosite fiber during this period (probably around 1950-1955). However, the amount involved was to our recollection minimal.

B.3. (c) We did and still do put a warning label on all Transite Pipe which is shipped to fabricators. We have several customers who fabricate fittings from straight lengths of pipe.

B.3. (c) 1. A facsimile of the warning label (full size) is attached.

B.3. (c) 2. We started using these labels on 1/15/73.

B.3. (c) 4. We have made no changes in this label or its use since its inception.

C. We do manufacture and ship Transite Pipe containing asbestos to points in California.

(1) We currently furnish Transite Pipe under a broad range of designs and names.

TRANSITE	Water Pipe
"	Sewer Pipe
"	Gas Vent
"	Vent Duct
"	Underdrain
"	Air Duct
"	Conduit Type II
"	Korduct (Conduit Type I)
"	T Irrigation Pipe
"	Storm Drain
"	Small Diameter Sewer Pipe
"	Transmission Pipe
"	Temp Tite
"	On Farm Irrigation
"	Well Casing
"	Irrigation for FUR
"	Super Vent Tite

(2) All of the products listed above are made with Chrysotile fiber. Since the last half of 1974, we have been using Amosite fiber in some production in addition to Chrysotile.

CAUTION

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

PRIVILEGED
J-M 83

START, COPY

INITIALS

DATE

BOX NO./FILE DRAWER NO.

SEGMENT NO.

SIGNIFICANT

NOTES

~~FILE #380~~ P 205 DRG