

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

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

PREFATORY STATEMENT

Between the years from approximately 1920 to 1976, United States Gypsum Company (hereinafter "this defendant"), or its predecessors, manufactured and sold some products containing asbestos. These products were manufactured and sold for use primarily in the residential, commercial, and public building construction industries.

The Complaint in these lawsuits assert that plaintiffs were employed as insulators for an aggregate period of 1940 to the present.

Such employment could have exposed plaintiffs to a variety of insulation products including blocks, batts, pipe-coverings, blankets, cloth, and insulating cements.

The only insulation products manufactured and sold by this defendant during the above period were block insulations, specifically K-FAC and K-FAC 19. The following responses set forth information relating to such products.



This defendant, United States Gypsum Company, responds to the following interrogatories on behalf of itself. To the extent information is requested concerning the activities of its subsidiaries, this defendant will respond with respect to such information as is available to this defendant.

J. F. Hernan, Manager, Corporate Quality Assurance, United States Gypsum Company, Chicago, Illinois, has reviewed the answers to these Interrogatories and has attested on behalf of United States Gypsum Company to the accuracy of these answers for the purpose of satisfying the verification requirements. J. F. Hernan has been employed by United States Gypsum Company from 1950 to the present. These answers have been prepared based upon the continual review of documents located within United States Gypsum Company files and information obtained from discussions with various United States Gypsum Company employees over a period of many years. The information contained herein has been assembled for the purpose of responding to these Interrogatories. It is not possible to reconstruct each step taken to gather this information or to verify that all documents which might possibly pertain to the matters at issue have been located or examined in connection with these answers. Nor is it possible to specifically indentify by name each person who has participated in the preparation of these answers or to identify each document that may have provided information used in preparing these answers. United States Gypsum Company reserves

the right to amend or supplement these answers in its sole discretion.

RESPONSES TO INTERROGATORIES

1. J. F. Hernan, Manager, Corporate Quality Assurance, 101 South Wacker Drive, Chicago, Illinois 60606. See Prefatory Statement.

2. This defendant is authorized to do business in the State of Georgia. This defendant's principal place of business is: 101 South Wacker Drive, Chicago, Illinois 60606. See Prefatory Statement.

3. Yes.

4. No.

5. Yes.

6. With respect to the products identified in the Prefatory Statement, K-FAC and K-FAC 19:

(a-c) K-FAC - 1943-1950; K-FAC 19 - 18 months during 1970-1971.

(d) Objection. This information is confidential and a trade secret.

(e) With respect to the products identified in the Prefatory Statement, K-FAC and K-FAC 19 were lightweight, rigid block insulation products, grayish-white in color. K-FAC 19 measured 6" X 8", 12" X 18", 12" X 36", or 24" X 48".

(f) K-FAC was sold primarily for use in insulating railroad locomotive boilers with perhaps incidental sales for use in connection with stationary boilers. K-FAC 19 was used for insulation or high-temperature ovens, furnaces and kilns.

(g) The products identified in the Prefatory Statement were manufactured and sold by this defendant.

(h) See this defendant's Response to Interrogatory No. 36.

7. Unknown. Discovery continues.

8. See this defendant's Response to Interrogatory No. 7.

9. With respect to the products identified in the Prefatory Statement, there may have been minor changes over the years due to raw material availability and differing geographical market conditions.

10. See this defendant's Response to Interrogatory No. 9.

11. Objection. This Interrogatory is vague and ambiguous. The type of testing about which plaintiffs inquire is not stated.

12. See this defendant's Response to Interrogatory No. 11.

13. The products identified in the Prefatory Statement were not "designed" as this defendant understands the term.

14. See this defendant's Response to Interrogatory No. 13.

15. See this defendant's Response to Interrogatory No. 13.

16. See this defendant's Responses to Interrogatory Nos. 12 and 15.

17. See this defendant's Response to Interrogatory No. 13.

18. See this defendant's Responses to Interrogatory Nos. 14 and 17.

19. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge information, and belief.

20. See this defendant's Response to Interrogatory No. 1

21. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge information, and belief.

22. See this defendant's Response to Interrogatory No. 2

23. Yes.

24. Objection. This Interrogatory is overbroad and burdensome. This defendant has been named in numerous lawsuits alleging injuries arising from exposure to asbestos since 1976. This defendant does not maintain an index of the information requested. It would be extremely burdensome to assemble the information. Without waiving this objection, this defendant responds with respect to similar personal injury cases filed and pending in Georgia other than those filed by the plaintiffs' attorney in these actions (plaintiff name, court number, date of notice of claim, plaintiff's attorney):

(a-g) Joseph S. Taylor, CV481-229, 6/26/81, Ronald Motley; Kenneth Hightower, C83-764-A, 5/24/83, Stanford & Bohannon Robert L. Taylor, CV183-288, 1/9/84, Ronald Motley; and Frankie Murray, 83-4202-QQ, 10/21/83, Richard Middleton.

25. With respect to the products identified in the Prefatory Statement, this defendant has no sales records from which to ascertain the information requested.

26. See this defendant's Response to Interrogatory No. 25.

27. Yes.

28. Discovery continues.

29. See attached.

30. See attached.

31. Objection. This Interrogatory calls for a technical and medical conclusion which this defendant is not qualified to make. No employee of this defendant is qualified to respond.

32. See this defendant's Response to Interrogatory No. 31.

33. With respect to the products identified in the Prefatory Statement, no containers of K-FAC have been located from which to ascertain this information. K-FAC 19 was packaged in cartons of varying sizes. No cartons have been located from the time period during which K-FAC 19 contained a small amount of asbestos and this defendant therefore cannot respond to this Interrogatory.

34. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge, information, and belief.

35. Not applicable. See this defendant's Response to Interrogatory No. 4.

36. (a-c) The following are known to have been approved suppliers of asbestos: Canadian Johns-Manville, Lake Asbestos of Quebec, Nicolet Industries, Carey-Canadian, and Asbestos Corporation Ltd. Investigation continues. This defendant has located no

documentation to ascertain from whom asbestos was purchased and actually used in the manufacturing of products identified herein.

37. With respect to the products identified in the Prefatory Statement:

(a) K-FAC - East Chicago, Indiana, 1943-1950;
K-FAC 19 - Greenville, Mississippi, 18 months during 1970-1971.

38. Not applicable. See this defendant's Response to Interrogatory No. 3.

39. Believed to be yes. See this defendant's Response to Interrogatory no. 36.

40. (a) See this defendant's Response to Interrogatory No. 36;

(b) With respect to the products identified in the Prefatory Statement, see this defendant's Response to Interrogatory No. 37.

41. Yes.

42. (a) With respect to the products identified in the Prefatory Statement, unknown exactly, but due to shipping costs for K-FAC, probably the geographic area immediately surrounding the manufacturing facility.

(b) With respect to K-FAC, 1943-1950; K-FAC 19 - 18 months during 1970 and 1971.

43. With respect to the products identified in the Prefatory Statement, low profitability of product or general reformulation.

44. Objection. This Interrogatory is argumentative in that it implies by use of the word "other asbestos manufacturers" that this defendant is considered by the plaintiffs to be an asbestos manufacturer. This defendant objects to this characterization. Furthermore, this Interrogatory is vague and ambiguous in that plaintiffs do not define which manufacturers or retailers plaintiffs are, in fact, referencing. Accordingly, this defendant is unable to frame a meaningful response.

45. See this defendant's Response to Interrogatory No. 44.

46. Objection. This Interrogatory is vague and ambiguous in that the Interrogatory is incomplete as written. Accordingly, this defendant is unable to form a meaningful response.

47. See this defendant's Response to Interrogatory No. 46.

48. Objection. This Interrogatory calls for speculation on the part of this defendant.

49. See this defendant's Response to Interrogatory No. 48.

50. This defendant is aware of a "Memorandum of Agreement" dated November 20, 1936, produced to this defendant in other litigation in the late-1970's, which refers to a study conducted by Dr. LeRoy Gardner at Saranac Lake Laboratory. However, this defendant cannot confirm whether or to what extent, it may have participated in the study or received the findings.

51. This defendant has since 1939 employed a Medical Director. Their names and dates of employment are: Dr. C. A. Hedblom - 1974-present; Dr. W. Highstone (deceased) - 1939-1974.

52. The Medical Director reports to the Vice-President - Personnel.

53. The Medical Director operates a medical facility in Company general offices; conducts and manages a medical program; and furnishes counsel as required to assure the health and well-being of all Company employees.

54. With respect to the plants where the products identified in the Prefatory Statement were manufactured: East Chicago, Indiana: R. J. Liehr, M.D.; F. F. Boys, M.D.; F. A. Benchik, M. D.; G. A. Thegze, M. D.; J. P. Mangahas, M.D.; Judith Demkowicz, R.N.; and E. Eggers, R.N. Greenville, Mississippi: J. B. Hirsch, Sr., M.D.; O. Beck, M.D.; J. B. Hirsch, Jr., M.D.

55. This defendant has not and does not now employ a Certified Industrial Hygienist.

56. Not to this defendant's best current knowledge, information, and belief.

57. Unknown. Discovery continues.

58. None of which this defendant is currently aware.

59. See this defendant's Response to Interrogatory No. 58

60. None of which this defendant is currently aware.

61. None of which this defendant is currently aware.

62. See this defendant's Responses to Interrogatory Nos. 60 and 61.

63. This defendant has a Research Department which was established in 1921. No medical research is performed.

64. Unknown. Discovery continues.

65. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge, information, and belief.

66. Yes; July, 1981; none.

67. Not to this defendant's best current knowledge, information, and belief.

68. Not to this defendant's best current knowledge, information, and belief.

69. Not to this defendant's best current knowledge, information, and belief.

70. Yes; Industrial Health Foundation; 1974-1981.

71. Not to this defendant's best current knowledge, information, and belief.

72. Yes, January, 1974.

73. Not to this defendant's best current knowledge, information, and belief.

74. With respect to the period of manufacture of the products identified in the Prefatory Statement, none of which this defendant is currently aware dealing specifically with "occupational health and exposure to asbestos."

75. Not applicable. See this defendant's Response to Interrogatory No. 74.

76. Not to this defendant's best current knowledge, information, and belief.

77. See this defendant's Response to Interrogatory No. 76

78. Not to this defendant's best current knowledge, information, and belief.

79. See this defendant's Response to Interrogatory No. 78

80. None to date.

81. None to date except for Plaintiff's Responses to discovery requests.

82. See this defendant's Response to Interrogatory No. 81

83. See this defendant's Response to Interrogatory No. 81

84. This defendant did not and does not now maintain a medical library.

85. Not to this defendant's best current knowledge, information, and belief.

86. Not to this defendant's best current knowledge, information, and belief.

87. This defendant possesses some sales literature for the periods during which the products identified in the Prefatory Statement were manufactured and sold. It is unknown to this defendant whether or not any of these materials may have reached any "customers and users" of said products.

88. With respect to the products identified in the Prefatory Statement, none of which this defendant is currently aware

89. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge, information, and belief.

90. Such determination has not as yet been made. This reserves the right to supplement its response at a later date.

91. This defendant understands the term "threshold limit value" to mean concentration to which nearly all workers may be repeatedly exposed, day after day, without adverse effect.

92. Objection. This Interrogatory calls for speculation on the part of this defendant.

93. This defendant is currently cognizant of threshold limit values for airborne materials. It is unknown when or how this defendant first possessed this knowledge.

94. Unknown, if any. Discovery continues.

95. With respect to the products identified in the Prefatory Statement, K-FAC: Could be cut to size, if necessary. K-FAC 19: the product was laid into place, usually onto a stainless steel surface. If necessary, it could be cut to fit. It was attached with pins and stud-welded to the steel surface. Usually the product would then be covered with metal to protect it.

96. Yes. Unknown. Discovery continues.

97. This defendant has been aware since at least 1948 that there is some medical evidence that suggests that inhalation of large quantities of asbestos dust for long periods of time could produce a lung condition known as asbestosis. It is presently unknown how this defendant obtained this information. Also, this defendant is aware of a "Memorandum of Agreement" dated November 20, 1936, produced to this defendant in other litigation in the late 1970's, which refers to a study to be conducted by Dr. LeRoy Gardner at Saranac Lake Laboratory. However, this defendant cannot confirm

whether, or to what extent, it may have participated in the study or received the findings. This defendant to this day has no knowledge that use or fabrication of the products identified in the Prefatory Statement posed a hazard of asbestosis.

98. There was no formal "library of collection of medical information pertaining to effects of asbestos upon human health" maintained by this defendant, except in anticipation of litigation.

99. With respect to the products identified in the Prefatory Statement, not to this defendant's best current knowledge information, and belief.

100. See this defendant's Response to Interrogatory No. 9

101. See this defendant's Response to Interrogatory No. 9

102. Medical experts with whom this defendant has consult report that asbestosis is a form of pneumoniosis caused by inhalati of large quantities of asbestos fibers for long periods of time. There are over 100 different forms of pneumoconiosis with over 100 different causes.

103. Objection. This Interrogatory is vague and ambiguous. The standard of comparison is not stated.

104. Objection. This Interrogatory is vague and ambiguous. The standard of comparison is not stated.

105. Medical experts with whom this defendant has consulted report that there is no connection of which they are currently aware.

106. This defendant has been aware since the mid-1960's that there is some medical evidence that suggests that in some instances there is a correlation between inhalation of asbestos

fibers and certain types of lung cancer. This defendant does not know when or how it specifically became aware of this information. It has no knowledge to this day that use of the products identified in the Prefatory Statement, either during use or after application or installation, released respirable asbestos fibers in any quantity or sufficient quantities to create a hazard of lung cancer. This defendant is not aware of convincing medical evidence linking inhalation or ingestion of asbestos fibers and cancer of the rectum, stomach and brain.

107. See this defendant's Responses to Interrogatory Nos. 97 and 106.

108. Not to this defendant's best current knowledge, information, and belief.

109. Objection. This Interrogatory is overbroad in that inquiry regarding amosite and crocidolite is not reasonably calculated to lead to the discovery of admissible evidence since said fiber types were not, to this defendant's best current knowledge, information, and belief, part of the formulations of the products identified in the Prefatory Statement. With respect to chrysotile, this defendant has not as yet identified a medical expert to testify, therefore, this defendant reserves the right to supplement its response at a future date.

110. Not to this defendant's best current knowledge, information, and belief.

111. Objection. This Interrogatory is overbroad. There has been no allegation that any of these plaintiffs were

ever employees of this defendant. Therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, this defendant responds 1954.

112. With respect to the products identified in the Prefatory Statement, no such notice was given to this defendant's best current knowledge, information, and belief.

113. Objection. This Interrogatory is overbroad. There has been no allegation that any of these plaintiffs were ever employees of this defendant. Therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, see attached Bulletins. It is unknown when or if and/or how these materials were actually "distributed" to this defendant's employees.

114. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

115. Not to this defendant's best current knowledge, information, and belief.

116. Such determination has not as yet been made. This defendant reserves the right to amend its response prior to trial.

117. Such determination has not as yet been made. This defendant reserves the right to amend its response prior to trial.

118. Such determination has not as yet been made. This defendant reserves the right to amend its response prior to trial.

119. Such determination has not as yet been made. This defendant reserves the right to amend its response prior to trial.

120. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

121. See this defendant's Response to Interrogatory No. 120.

122. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

123. See this defendant's Response to Interrogatory No. 122.

124. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

125. See this defendant's Response to Interrogatory No. 124.

126. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

127. See this defendant's Response to Interrogatory no. 126.

128. Yes. Discovery continues. This defendant reserves the right to supplement its response at a future date.

129. See this defendant's Response to Interrogatory no. 128.

130. With respect to the products identified in the Prefatory Statement, this defendant has no records from which to ascertain this information.

131. There has been no such allegation, therefore this defendant does not believe that a workmen's compensation shield

could be used as a defense. However, this defendant reserves such a "shield" should one become viable pending further discovery.

132. To this defendant's best current knowledge, information, and belief, there is no single substitute for the physical and chemical characteristics of asbestos.

133. Yes.

134. This defendant has responded to numerous discovery requests for information similar to that which is requested herein. As a result, this defendant has accumulated general information, the source of which is no longer identifiable.

135. Objection. This Interrogatory is overbroad. This defendant is not contesting jurisdiction; therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence.

136. Objection. This Interrogatory is overbroad. This defendant is not contesting jurisdiction; therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence.

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141. Objection. This Interrogatory is overbroad. This defendant is not contesting jurisdiction; therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence.

142. Objection. This Interrogatory is overbroad. This defendant is not contesting jurisdiction; therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence.

143. With respect to the products identified in the Prefatory Statement, this defendant has no sales records from which to ascertain this information.

144. Objection. This Interrogatory is overbroad. This defendant is not contesting jurisdiction; therefore, such inquiry is not reasonably calculated to lead to the discovery of admissible evidence.

145. Prior to 1940, a group within this defendant's corporate structure was engaged in contracting. It is unknown whether said group formally was a division, as no documents have

been located from which to verify this information. This defendant has no further information.

146. Unknown. See this defendant's Response to Interrogatory No. 145.

147. Not applicable. See this defendant's Response to Interrogatory No. 146.

148. Not applicable. See this defendant's Response to Interrogatory No. 147.

149. Unknown. See this defendant's Response to Interrogatory No. 145.

150. Not applicable. See this defendant's Response to Interrogatory No. 149.

151. Unknown. See this defendant's Response to Interrogatory No. 145.

152. Objection. This Interrogatory calls for a technical conclusion. No employee of this defendant is an expert on respirators.

153. Unknown. See this defendant's Response to Interrogatory No. 145.

154. Unknown. See this defendant's Response to Interrogatory No. 145.

155. Unknown. See this defendant's Response to Interrogatory No. 145.

156. Unknown. See this defendant's Response to Interrogatory No. 145.

157. Unknown. See this defendant's Response to Interrogatory No. 145.

158. Not applicable. See this defendant's Response to Interrogatory No. 157.

159. Not applicable. See this defendant's Response to Interrogatory No. 151.

160. See this defendant's Response to Interrogatory No. 145.

161. Not applicable. See this defendant's Response to Interrogatory No. 160.

162. Not applicable. See this defendant's Response to Interrogatory No. 161.

163. Not applicable. See this defendant's Response to Interrogatory No. 162.

164. See this defendant's Response to Interrogatory No. 145.

165. Not applicable. See this defendant's Response to Interrogatory No. 164.

166. Not applicable. See this defendant's Response to Interrogatory No. 165.

167. Not to this defendant's best current knowledge, information, and belief.

168. Not to this defendant's best current knowledge, information, and belief.

169. Not to this defendant's best current knowledge, information, and belief.

170. Not to this defendant's best current knowledge, information, and belief.

171. No such claims have been filed, to this defendant's best knowledge, information, and belief.

172. Not applicable. See this defendant's Response to Interrogatory No. 145.

173. See this defendant's Response to Interrogatory No. 172.

174. This defendant presently manufactures and sells no asbestos-containing insulation products.

175. Not applicable. See this defendant's Response to Interrogatory no. 174.

This the 9 day of August, 1984.

BRANNEN, WESSELS AND SEARCY

BY: Darlene Ross
DARLENE Y. ROSS
ATTORNEYS FOR DEFENDANT
UNITED STATES GYPSUM COMPANY

Post Office Box 8002
Savannah, Georgia 31412
(912) 234-8875

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

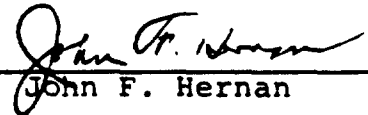
VERIFICATION

I, JOHN F. HERNAN, declare:

I am the Manager, Corporate Quality Assurance, of United States Gypsum Company, one of the above named defendants, and am authorized to make this verification for and on behalf of said corporation;

I have read the foregoing Answers, Objections, and other Responses to Plaintiff's Interrogatories and am informed and believe that the same is true and on that ground allege that the matters therein stated are true.

I declare, under penalty of perjury, that the foregoing is true and correct, and that this declaration was executed on August 7, 1984, in Chicago, Illinois.



John F. Hernan

Subscribed and sworn to before
me this 7th day of August, 1984.



Notary Public

Approved: *EWDK*

ENGINEERING

Installations of operating equipment in all plants shall be so designed and installed as to meet or exceed any state requirement on ventilation and dust control. The Works Manager shall immediately notify his Production Manager in the event of any non-compliance of ventilation or dust control laws, outlining his recommendations for changes in equipment or design or methods necessary for full compliance with the state or local regulations.

Where the control of dust is impossible with existing plant facilities, authority request for dust-collecting equipment shall be prepared and submitted to the Production Manager.

REQUIRED PRECAUTIONS

Works Managers shall ascertain that the following precautions are taken to eliminate or prevent extremely dusty conditions and shall likewise avoid employment of individuals previously exposed to hazardous dust concentrations:

Adequate ventilation shall be maintained in all work areas. Clean-up work shall be handled in a manner which will not greatly increase dust concentration.

Dust-collecting equipment shall be regularly inspected and maintained following instructions issued by the manufacturer. Such equipment, when installed, shall be of such capacity as to control the maximum anticipated concentrations of dust.

Bates packers shall be kept tight and, if necessary equipped with hood and collector.

Conveying, elevating and mixing equipment shall be so maintained that they are not sources of excessive dust.

Buhr stone dressing operations shall be provided with adequate equipment for removing dust at point of operation. The collector shall be of a type which provides suction at the dressing tool and removes the dust from the surface of the stone. The dust drawn into the collector must be discharged into an arrestor. Workmen engaged in dressing of buhr stones are required to wear goggles and respirators.

BRICKLAYERS

Employees required to regularly handle fire brick containing a high percentage of free silica shall be required to wear adequate respiratory equipment.

ELIMINATION OF DUSTY CONDITIONS

No. 2-5

Date 2-11-54

Page 2 of 3

Cancels Page 2

Dated 4-1-43

Asbestos Exposure

Operations involving manual handling of asbestos in any plant shall be considered in an area in which employees shall be required to wear adequate respiratory equipment.

Pre-Employment Physical Examinations

Before any applicant for employment is hired, the history of his previous employment should be fully developed. If there is a questionable history of exposure to asbestos or silica dust, or an indicated partial lung disability such as tuberculosis, the applicant shall not be employed in any plant until he satisfactorily passes an X-ray examination.

The occupational history of all applicants for employment should be fully recorded on Employment Data and Application Card, Form 1614 - 12/52 Revised, for all applicants hired.

RESPIRATORS

Only respirators approved by the United States Bureau of Mines may be purchased and used for protection against injurious dusts. In other locations it may be well to provide Martindale Protective Masks to employees to minimize the inhalation of nuisance dusts.

Employees exposed to high concentrations of dust on infrequent jobs such as mixer clean out, screen retarder, sweeping or cleaning under very dusty conditions, etc., shall be required to wear an approved filter-type respirator.

A complete list of such respirators, entitled "List of Respiratory Protective Devices Approved by Bureau of Mines", Information Circular No. 7636, is available at no cost from the United States Department of Interior Bureau of Mines, Washington, D. C.

Care of Respirators

Respirators shall not be interchanged among employees and shall be washed and sterilized by one of the following methods before reissue to the same employee: (NOTE: Remove filter units before sterilizing and washing.)

1. Immerse respirator in a 1-to-2-per cent solution of creosol. Rinse thoroughly and allow to dry.

Approved:

CWDK

Canceled
Dated (New)

2. Immerse respirator in alcohol in strength of 75% or more. Avoid alcohol that is denatured with poisonous or irritating substances, unless the respirator is thoroughly rinsed after sterilizing.
3. Place the respirator in a moist atmosphere of antiseptic gas, such as formaldehyde. This must be done in a tight cabinet.
4. Immerse respirator for 10 minutes in a solution of Formalin, then rinse. The solution can be made by mixing 1 part of 40% formaldehyde in 9 parts of water.
5. Immerse respirator in boiling water or live steam for 5 minutes.
(NOTE: Repeated immersions in boiling water or steam will harden rubber parts of the respirator.)

Prior to sterilizing the respirators, it is well to wash the rubber and metal parts with soap, brush and warm water and rinse thoroughly.

EXPLOSIVE DUSTS

Dust which has an explosion or flash fire potential such as coal, wood, paper, starch, etc., shall be adequately controlled, arrested and removed to eliminate or minimize the possibility of an explosion or flash fire. Refer all questions concerning explosive dusts and their control to Department 186 - Tax and Property Department, Chicago Office.

Asbestos

Inhalation of the dust for long periods of time can produce a disabling lung condition called asbestosis.

Not to be handled in confined areas without local exhaust ventilation at the point of handling.

Intermittent handling for short periods may be done in open areas with good general room ventilation.

Dust counts should be less than 5 million at such operations (1 million on a count of asbestos alone, not including the other dust present.

Asbestos "warts" on hands due to asbestos fibres penetrating skin - fibre must be completely removed.

Asbestosis - lungs should be x-rayed periodically.

Operating Division INFORMATION BULLETIN	
Approved: 	
HAZARDOUS CHEMICAL Used in Paint Manufacture	
No. 602	Date 9-3-48
Page 1 of 4	Outline NEW
Dated	

CERTIFICATE OF SERVICE

This is to certify that copy of the foregoing Responses to Interrogatories has been served on plaintiff's counsel and counsel for all parties by placing copy of same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereto.

This the 9 day of August, 1984.

BRANNEN, WESSELS AND SEARCY

BY: Darlene Ross
DARLENE Y. ROSS
ATTORNEYS FOR DEFENDANT
UNITED STATES GYPSUM COMPANY

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