

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA

BRUNSWICK DIVISION

CIVIL ACTION NO. CV282-131

HAROLD S. FRASER and)
MATTIE LEE FRASER,)
PLAINTIFFS,)
v.)
JOHNS MANVILLE SALES)
CORPORATION, ET AL.,) DEFENDANT GAF CORPORATION'S
DEFENDANTS.) ANSWERS TO PLAINTIFFS'

INTERROGATORIES

NOW COMES the Defendant GAF Corporation and
responds to the Plaintiffs' interrogatories dated June 23,
1982 as follows:

1. Patricia Corbutt, Assistant Secretary, GAF
Corporation, c/o GAF Corporation, 140 West 51st Street, New
York, New York 10020.

2. Yes.

3. Yes.

4. Yes.

5. On May 26, 1967, GAF merged with The Ruberoid
Co., a New Jersey corporation ("Ruberoid"). Ruberoid began
the manufacture of industrial thermal insulation products
containing asbestos in the late 1920's and the early 1930's.
GAF ceased the manufacture of such products in September,
1971. Those products manufactured included:

Calsilite - a hard, lightweight substance of
various thicknesses and sizes, used as a pipecovering and
built-up block. The product consisted of 3.5% amosite
asbestos fiber, 5.6% Canadian chrysotile asbestos fiber, 2%
Vermont chrysotile asbestos fiber, pulverized quicklime,
silica sand, Ph dolomite, diatomaceous earth, magnesium

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DISC.

Find Interrog.
Requests etc. *in addition* served & To me with This. 8.30

sulphate, Benotite and Calsilite waste. Calsilite was manufactured from 1949 until 1971 at Gloucester City, New Jersey.

"115" and "214" Insulating Cements - chrysotile asbestos products, off-white to light gray in color. Used for insulating or finishing purposes, these cements were produced subsequent to 1937 until 1975. The principal mining activities took place in Eden, Vermont until Ruberoid built a new facility in Lowell, Vermont in the early 1950's. The business office was located at Hyde Park, Vermont.

"313" Insulating Cement - used for insulation and finishing purposes, was composed of chrysotile asbestos fiber and clay. It was darker in color and of a smoother consistency than other GAF insulating cements. The cement was produced from 1960 to 1971 by Baldwin-Ehret-Hill, now Keene Corporation, and possibly other manufacturers as well, to be sold by GAF.

"412" Insulating Cement - a chrysotile asbestos product, was off-white to gray in color. It was manufactured at Hyde Park, Vermont subsequent to 1960 until the early or mid 1970's. It is believed that Baldwin-Ehret-Hill, now Keene Corporation, and possibly other manufacturers of insulating cement which contained asbestos, produced "412" Insulating Cement to be sold by GAF.

Calsilite Insulating Cement - used for thermal insulation purposes, had less density and a lighter texture than other GAF cements. It consisted of 36.8% ground Calsilite, 45% chrysotile asbestos fiber of grade 7K or better, 13.6% Lummite cement and 4.6% Portland cement. Calsilite insulating cement was produced at Gloucester City, New Jersey from 1951 to 1960.

T/NA-100 - was a two-ply laminated product which contained an interior layer of asbestos paper bonded with Neoprene to a layer of polyvinyl-flouride plastic film on

the exterior. The asbestos paper used in the product was manufactured by GAF at the Erie 16th Street facility. Other portions of T/NA-100 were manufactured by I.E. duPont and de Nemours Company of Wilmington, Delaware, and the finished product was assembled by the High Vacuum Company in Passaic, New Jersey. Manufactured from 1962 to 1971, T/NA-100 was wrapped around standing pipes and used for covering tanks and rounded surfaces.

Flat and Corrugated Asbestos Paper - were gray-colored products consisting of sulphite pulp and chrysotile asbestos fiber. Manufactured by GAF in Erie, Pennsylvania from 1928 to 1981, the asbestos fiber used in the paper was purchased from the Johns-Manville Companies, Lake Asbestos Company and Philip Carey Company. Flat and corrugated asbestos papers functioned as insulating around warm air furnace pipes for boiler jacketing and for insulating air conditioner ducts.

Asbestos Rollboard - was an asbestos paper product of greater thicknesses than other asbestos paper products. The asbestos content varied, but, as a rule, the amount of asbestos contained in the rollboard was less than 40%. GAF manufactured asbestos rollboard from 1928 to 1981 in Erie, Pennsylvania. The Johns-Manville Companies, Lake Asbestos Company and Philip Carey Company supplied GAF with the asbestos fibers found in rollboard. The product was used to wrap furnace pipes and heating and air conditioning ducts.

Asbestos Millboard - consisted of sulphite paper and up to 40% chrysotile asbestos. At times the product also contained crocidolite, a blue asbestos fiber. Prior to World War II, until 1981, asbestos millboard was manufactured by GAF in Erie, Pennsylvania. The asbestos fibers used in the product were supplied to GAF by the Johns-Manville Companies, Lake Asbestos Company and Philip Carey Company. Asbestos millboard products were used as

gaskets for insulating oven and humidity chambers and for welding insulation.

Vermont Hooker Grade Fiber - was produced almost exclusively at the Vermont mine beginning after World War II until 1975. The product was a Grade 3 chrysotile fiber mined specifically for use in chlorine filters. Off-white in color, this product was a much lighter shade than other Vermont asbestos.

6. Yes.

7. After 1954, Vermont chrysotile asbestos was eliminated from Calsilite and replaced with a combination of amosite asbestos and Canadian chrysotile asbestos. In the mid 1960's, "Calsilite SS" was developed to prevent stress corrosion and chloride cracking of austenitic stainless steel piping. In 1970, GAF developed asbestos-free Calsilite II, in which asbestos was replaced with sulphite pulp.

In or about 1975, latex binders were added to flat and corrugated asbestos papers and to asbestos millboard to alleviate any potential asbestos-related problem.

8. Yes.

9. Herbert Abraham, former president of the Ruberoid Co., held an original patent on Calsilite. Other manufacturers hold a number of patents which pertain to the fabrication of calcium silicate insulation products. In 1970 GAF filed a patent application for Calsilite II. The patent application and process rights were sold to the purchasers of the Calsilite plant.

A copy of United States Patent No. 3,300,927 (T/NA-100), together with certain sales materials relating to the products listed in response to interrogatory numbered five (5), are presently in the possession of GAF. Said

documents are located at GAF's principal place of business,
140 West 51st Street, New York, New York 10020.

10. No.

11. Not applicable. ?

12. Yes.

13. In approximately 1964, Ruberoid began placing
the following warning labels on packages of its products
containing asbestos fiber:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION
OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG
PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED,
AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION
CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED
BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS
PRODUCING DUST.

The wording of the label was changed in 1970.
In addition, the warning was moved from the sides to the
front of the carton. The label read as follows:

CAUTION

CONTAINS ASBESTOS FIBERS. INHALATION IN EXCESSIVE
QUANTITIES OVER LONG PERIODS OF TIME MAY BE
HARMFUL. AVOID BREATHING DUST. IF ADEQUATE
VENTILATION IS NOT POSSIBLE, WEAR RESPIRATORS
APPROVED BY THE U.S. BUREAU OF MINES FOR
PNEUMOCONIOSIS PRODUCING DUST.

The warning was further changed in approximately
1972 to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE
QUANTITIES OVER LONG PERIOD OF TIME MAY BE
HARMFUL. AVOID BREATHING DUST.

14. Yes.

15. Attached hereto as Exhibit A is a schedule providing the requested information.

16. Calsilite was packaged in corrugated cardboard cartons with the word "Calsilite" printed on it. The name of the company was printed on the labels, and a "fire-in-the-pipe" symbol was added to the logo after 1960.

"115" and "214" Insulating Cements were packaged in 50-lb. and 100 lb. bags until the early 1950's. At that time the packaging was changed to 50-lb. and 100-lb. kraft paper bags with plastic lining. The name of the company was printed on the bags.

"313" Insulating Cement was packaged in 50-lb. kraft paper bags with plastic lining. The company name was printed on the bags.

The packaging of "412" Insulating Cement contained the company name and the temperature ranges of the product.

Calsilite Insulation Cement was packaged in 50-lb. kraft paper bags with plastic lining. A label on the package identified Ruberoid as the manufacturer.

T/NA-100, Flat Asbestos Paper, Asbestos Rollboard and Asbestos Millboard were shipped in rolls of various sizes and packaged in corrugated cardboard cartons. Corrugated Asbestos Paper was sold in rolls, sheets and blocks. The company name appeared on the cartons of all of these products. And the words "Corrugated Asbestos Paper" and "Asbestos Rollboard" were found on the cartons of each of these products identifying them as such.

Vermont Hooker Grade Fiber was packaged in 50-lb. and 100-lb. kraft paper bags with plastic lining.

17. Yes.

18. GAF objects to interrogatory numbered eighteen (18) (a) and (c) on the grounds that they are overly broad, burdensome, oppressive, irrelevant and not calculated to lead to the discovery of admissible evidence.

(b) GAF began its sale and distribution of asbestos related materials in 1928 and ceased the bulk of its manufacture of asbestos-containing products in 1971.

19. Lack of commercial demand or sale of facilities where products were manufactured.

20. Not with this Defendant.

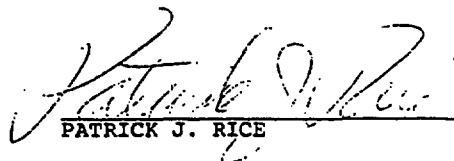
21. Not applicable.

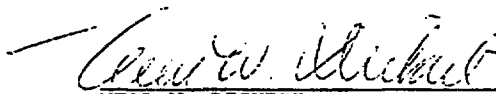
22. No.

23. In approximately 1964, when The Ruberoid Co. began placing warning labels on its products, it became aware of opinions expressed by members of the medical profession which indicated that the inhalation of excessive quantities of asbestos fibers for prolonged periods of time under certain conditions could be hazardous to the health of some persons.

24. GAF objects to interrogatory numbered twenty-four (24) on the grounds that it is argumentative, ambiguous, calls for a conclusion and expert technical and medical opinions.

25. At this time GAF has not identified any expert witnesses it intends to rely upon at trial.


PATRICK J. RICE


NEAL W. DICKERT
ATTORNEYS FOR GAF CORPORATION

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404/722-4481

A F F I D A V I T

STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

Before me, the undersigned authority, a notary public in and for the aforesaid State and County, personally appeared Patricia Corbutt who, being duly sworn according to law, deposes and says that she is an Assistant Secretary of GAF Corporation, that she is authorized to make this Affidavit, and that the facts contained in the foregoing Answers to Interrogatories are true and correct upon personal knowledge as to a part and information and belief as to the remainder.

Patricia Corbutt
Patricia Corbutt

Sworn to and subscribed
before me this 19th
day of August, 1982.

Vanessa G. Mangan
Notary Public

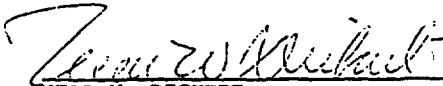
My Commission Expires:

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CERTIFICATE OF SERVICE

This is to certify that I have this day served
counsel for all parties in the foregoing matter with a
copy of this pleading or document by depositing in the
United States Mail a copy of same in a properly addressed
envelope with adequate postage thereon.

This 20th day of August, 1982.


NEAL W. DICKERT
Attorney for GAF Corporation