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IN THE COURT OF COMMON PLEAS 000431
SUMMIT COUNTY, OHIO

CLIFFORD PENGELLY,	)	CASE NO. CV 86 12 4267
	)	
Plaintiff,	)	JUDGE MORGAN
	)	
vs.	)	
	)	NOTICE OF SERVICE
THE B. F. GOODRICH COMPANY,	)	
	)	
Defendant.	)	

Pursuant to Rule 5(D) of the Ohio Rules of Civil Procedure, notice is hereby given that on this 20th day of May, 1987, counsel for Defendant served responses to Plaintiff's Interrogatories and Request for Production of Documents upon A. Russell Smith, 159 S. Main Street, Suite 503, Akron, Ohio 44308, by regular U.S. mail, postage prepaid, on the date referenced above.

ROETZEL & ANDRESS

Jeffrey J. Casto
75 East Market Street
Akron, Ohio 44308
(216) 376-2700

Attorney for Defendant

CERTIFICATE OF SERVICE

A copy of the foregoing Notice of Service has been sent by regular U.S. mail, postage prepaid, to A. Russell Smith, Esq., 159 S. Main Street, Suite 503, Akron, Ohio 44308, this 20th day of May, 1987.

Jeffrey J. Casto
Attorney at Law

PLAINTIFF'S EXHIBIT 10 7-8-98

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

CLIFFORD PENGELLY,	)	CASE NO. CV 86 12 4267
	)	
Plaintiff,	)	JUDGE MORGAN
	)	
-vs-	)	
	)	
THE B. F. GOODRICH COMPANY,	)	
	)	DEFENDANT'S RESPONSE TO
Defendant.	)	PLAINTIFF'S INTERROGATORIES

Defendant, THE B. F. GOODRICH COMPANY ("GOODRICH") responds to Plaintiff's Interrogatories in accordance with the Ohio Rules of Civil Procedure as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

In providing the following answers to Interrogatories, GOODRICH does not waive, and it expressly preserves, all of the defenses and objections set forth in GOODRICH's Answer to this action, which defenses and objections are incorporated herein by reference.

Without conceding that an action for discovery is valid or lawful against GOODRICH, such an action for discovery is limited to the relief expressly stated in the Complaint, namely "to identify the names and manufacturers of the various asbestos products used in Defendant's tire plants." The Interrogatories seek a great deal of information completely unrelated to the goal and relief requested in the Complaint. GOODRICH objects to any and all interrogatories seeking information other than the names of manufacturers or suppliers

of any asbestos used in GOODRICH's Akron, Ohio tire plants.

The Interrogatories assume that "talc" and "soapstone" contain asbestos. GOODRICH has no present information that tal or soapstone used at its Akron, Ohio tire manufacturing plants contained asbestos. (Throughout these interrogatory responses and this proceeding, the term "asbestos" will refer to "asbestos fibers" as that term is defined by the Occupational Safety and Health Administration in 29 C.F.R. §1910.1001(b).) Although GOODRICH is voluntarily providing information concerning talc/soapstone, no inference should be drawn that any talc or soapstone used at its Akron, Ohio tire plants contained any asbestos.

References to any asbestos-containing materials at Defendant's Akron, Ohio tire plants should not be construed as an express or implied admission that any asbestos fibers were airborne, or if they were, that any human exposure resulted.

Defendant objects to Plaintiff's Interrogatories to the extent that they call for information that is not available or accessible from its present employees, but which instead is obtainable from third persons not employed by GOODRICH and/or from records kept or compiled by persons not employed by GOODRICH. Under the Rules of Civil Procedure, Defendant is required only to provide information within its custody, possession or control, and Defendant has no obligation to obtain information from persons not currently employed by it.

Various products and processes of Defendant are

confidential and trade secrets. Defendant objects to the discovery to the extent that it seeks disclosure of detailed operating practices, process information, and other information that is protected from disclosure.

Defendant objects to the discovery to the extent that it seeks to discover any privileged information, including, but not necessarily limited to, information protected by the attorney/client or work product privilege.

Furthermore, GOODRICH objects to any interrogatories which request information concerning any of its plants in Summit County where Plaintiff did not work during his employment with Defendant since Mr. Pengelly is only entitled to discover the identity and names of manufacturers of various asbestos products in the specific work areas where he was employed.

Without waiving the foregoing objections and defenses, GOODRICH is voluntarily providing these responses and will make available to Plaintiff's counsel for inspection copies of non-privileged documents, as indicated in the responses to individual interrogatories. All of the foregoing defenses and objections will be deemed incorporated by reference in these voluntary responses.

INTERROGATORIES

1. State the name, address and job title of the individual who is answering these interrogatories on behalf of the defendant.

ANSWER:

Jeffrey J. Casto, Esq.
Roetzel & Andress
75 E. Market Street
Akron, Ohio 44308

The underlying information was compiled principally by:

S. D. Henning
The Uniroyal Goodrich Tire Company
600 S. Main Street
Akron, Ohio 44397

A verification statement on behalf of Uniroyal Goodrich is attached to the end of these responses.

2. State the name and address of each of defendant's plants in the Summit County, Ohio area where tires have been manufactured and as to each plant, state the years during which tires were manufactured.

ANSWER:

The BFGoodrich Company 1895-1987
500 S. Main Street
Akron, Ohio 44318

3. Identify defendant's tire plants in the Summit County, Ohio area which contained pipes or lines which were insulated with asbestos products.

ANSWER:

All plants had pipes or lines insulated with asbestos-containing materials.

4. State the names and addresses of all contractors known to have installed or supplied products containing asbestos to defendant's tire plants in the Summit County, Ohio area.

ANSWER:

Goodrich does not presently have available the names of any contractors who may have either installed or supplied products containing asbestos to defendant's tire plants in the Summit County, Ohio area.

5. Does the defendant maintain any records which would enable it to identify the names and/or manufacturers of products containing asbestos which have been installed and/or supplied to defendant's tire plants in the Summit County, Ohio area.

ANSWER: No records responsive to this interrogatory have been located.

6. If the answer to the foregoing interrogatory is in the affirmative, please state:

A. The identify and nature of the records kept.

B. The name, address, and job title of the custodian(s) of said records.

ANSWER: N/A

7. State whether the defendant used "soapstone" for any in the tire manufacturing plants in its Summit County, Ohio, area p between 1939 and the present date.

ANSWER: Yes, assuming soapstone is the same proc referred to in the answer to Interrogatory No. 8.

8. If the answer to the foregoing interrogatory is in th affirmative, state the various purposes for which soapstone would b in connection with the tire manufacturing process.

ANSWER: The terms "soapstone" and "talc" are o: used interchangeably. In general, talc and soapstone are common names for the platy form of the same generic mine: hydrous magnesium silicate, and talc usually refers to a r finely ground or highly processed form of the mine: "Soapstone/talc" was used as a "de-tackifier", i.e., to rubber products to prevent them from sticking together du: intermediate processing operations.

9. State the name and address of each manufacturer and supplier of soapstone to defendant's tire manufacturing plants in the Summit County, Ohio, area from 1939 to the present, and as to each such manufacturer or supplier, state:

A. The name of each soapstone product and the name and address of its manufacturer.

B. The dates during which said product was supplied to the defendant and the defendant's plants to which it was supplied.

C. The quantities purchased and the intervals at which said quantities were purchased.

D. Whether the soapstone contained asbestos.

ANSWER: The records retention policy of Uniroyal Goodrich provides for the maintenance of purchasing records for the past six years plus current. According to our records, the following companies were approved as vendors but purchases were not necessarily made from all of these vendors.

American Chemet Corp.
105 W. Madison Street
Chicago, Illinois

Cohutta Talc
P.O. Box 363
Dalton, Georgia

Eastern Magnesia Talc Co.
Subsidiary of Engelhard Mineral & Chemical Corp.
Menlo Park
Edison, NJ 08817
(Distributed by C. P. Hall, 4460 Hudson Drive, Stow, OH)

International Talc Co.
90 West Street
New York, NY

Milwhite Co.
P.O. Box 15038
Houston, TX 77020

Southern Talc (Georgia Talc)
P.O. Drawer F
Chatsworth, Georgia 30705

B. This information cannot be obtained without an exhaustive review of Goodrich's records. Accordingly, Goodrich is willing, at their option, to either permit Plaintiffs access to review appropriate records to ascertain the information requested under a suitable protective order or Goodrich will review their records and provide the information requested upon pre-payment of the costs involved with the document search and retrieval.

C. See answer to subpart B.

D. To the best of our knowledge, talc and soapstone supplied to Goodrich's tire manufacturing plants were asbestos-free.

10. State whether the defendant used "talc" for any reason in its tire manufacturing plants in the Summit County, Ohio area at any time between 1939 and the present.

ANSWER: See Answer to Interrogatory No. 7.

11. If the answer to the foregoing interrogatory is in the affirmative, state the various purposes for which talc would be used in connection with the tire manufacturing process.

ANSWER: See Answer to Interrogatory No. 8.

12. State the name and address of each manufacturer and supplie: of talc to defendant's tire manufacturing plants in the Summit County, Oh: area from 1939 to the present, and as to each such manufacturer or supplie state:

A. The name of each talc product and the name and address of its manufacturers.

B. The dates during which said product was supplied to the defendant and the defendant's plants to which it was supplied.

C. The quantities purchased and the intervals at which said quantities were purchased.

D. Whether the talc contained asbestos.

ANSWER: See Answer to Interrogatory No. 9.

13. State the name, the address, and the job title of the individual(s) in the employ of the defendant who are most knowledgeable regarding the names and manufacturers of products containing asbestos which were present in defendant's tire plants in the Summit County, Ohio, area from 1939 to the present.

ANSWER:

James Vanorsdel
Manager, Technical Department,
Aircraft Tires
The BFGoodrich Company
500 S. Main St.
Akron, Ohio 44318

Harold W. Dietz
Director of Health
& Environmental Services
The BFGoodrich Company
3925 Embassy Parkway
Akron, Ohio 44313

14. State the name and the address, and the job title of the individual(s) in the employ of the defendant who are most knowledgeable regarding the names and manufacturers of products containing asbestos which were present in defendant's tire plants in the Summit County, Ohio area prior to 1939.

ANSWER: See answer to Interrogatory No. 13.

15. State the name, address, and job title of those individuals who have been in the employ of the defendant whose principal responsibility was to manage or supervise shipping and receiving at defendant's tire plants in the Summit County, Ohio, area from 1939 to the present. (If not all names are known, please identify those which are known, together with the years served in that capacity and at which plant.)

ANSWER: Objection. See introductory statement. In addition, this interrogatory seeks information which is unnecessary, duplicative and burdensome. Without waiving the foregoing objection, Goodrich does volunteer that the following individual had responsibility relevant to shipping and/or receiving:

Bruce Kline
Manager, Receiving and Shipping
The BFGoodrich Company
500 S. Main Street
Akron, Ohio 44318

16. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the stock mixing process at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: Yes.

17. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

A. Steam pipe insulation.
Talc (soapstone)

B. Talc was used as a de-tackifier. That is to say that it was used to keep rubber products from sticking together. Steam pipes were insulated with asbestos-containing insulation.

C. See answer to No. 9 for suppliers of talc.

D. 500 S. Main Street
Akron, Ohio 44318

18. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the dipping, heating, treating, tensioning, and calendaring process at defendant's tire plants in the Summit County, Ohio, area, between 1939 and the present.

ANSWER: Yes.

[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

19. If the answer to the foregoing interrogatory is in affirmative, state:

A. The type of asbestos product used (e.g., pipe insula soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the during which it was used.

ANSWER:

See answer to Interrogatory No. 17.

20. State whether any products containing asbestos (inc but not limited to, insulating material, talc, soapstone, aprons, for hot knives, etc.) were present in the vicinity of employees wo in the waste and defective control department at defendant's tire in the Summit County, Ohio, area between 1939 and the present.

To our knowledge, Goodrich did not have a "waste defective control department."

[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

21. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The Plant(s) at which said product was used and the years during which it was used.

ANSWER: N/A

22. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the tuber process (tread extrusion, weighing, cooling, and cutting) at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: Yes.

Burns, Smith, Doan
& Goldsmith
[illegible]
Suite 103
[illegible]

23. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER: See answer to Interrogatory No. 17.

24. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in wire winding (bead room) process at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

The use of talcs, etc. was avoided in this area.

25. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER: N/A

26. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the maintenance department at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: Since maintenance employees performed work at various parts of the plant, it is possible that they may have worked in the vicinity of materials containing asbestos. Whether maintenance employees were in the vicinity of asbestos-containing materials would depend on the kinds of tasks performed. Maintenance employees occasionally did replacement of valve packings and gaskets, repair and replacement of steam lines and insulation. See other responses to Interrogatories for other tire manufacturing operations.

27. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

A. See answer to Interrogatory No. 26 and response to other Interrogatories.

B. See answers to other Interrogatories.

C. See answers to other Interrogatories.

D. See answers to other interrogatories.

28. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays fc hot knives, etc.) were present in the vicinity of employees working in the stock cutting and splicing process at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: See answer to Interrogatory No. 24.

29. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER: N/A

30. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the tire building at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER:

See answer to to Interrogatory No. 24.

31. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

N/A

32. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the tire curing (forming and vulcanizing) process at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER:

Yes

33. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

A. Pipe insulation
Talc

B. Pipe insulation
Transite type platen insulators
Brake shoes that may have contained asbestos

C. Information not available.

D. 500 S. Main Street
Akron, Ohio 44318

34. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the cement house at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER:

Yes

[illegible], Smith, Jones
& Goldsmith
[illegible] Main Street
Suite 103
[illegible]
[illegible]
[illegible]

35. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

A. Pipe insulation
Talc

B. Used in antiblemish paints and as a detackifying agent, also in the preparation of bladder release coatings.

36. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working in the tire mold cleaning process at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: No.

37. If the answer to the foregoing interrogatory is i affirmative, state:

A. The type of asbestos product used (e.g., pipe insu soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and th during which it was used.

ANSWER:

N/A

38. State whether any products containing asbestos (: but not limited to, insulating material, talc, soapstone, apron for hot knives, etc.) were present in the vicinity of employees in the tire mold changing process at defendant's tire plants in Summit County, Ohio, area between 1939 and the present.

ANSWER: Yes.

39. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER:

See answer to Interrogatory No. 33.

40. State whether any products containing asbestos (including, but not limited to, insulating material, talc, soapstone, aprons, trays for hot knives, etc.) were present in the vicinity of employees working at the Banbury at defendant's tire plants in the Summit County, Ohio, area between 1939 and the present.

ANSWER: Yes

Burns, Smith, Dore & Goldsmith
South Main Street
Suite 303
Akron, Ohio 44308
Area Code 216
Phone

40 STATE WHETHER ANY PRODUCTS CONTAINING ASBESTOS (INCLUDING BUT NOT LIMITED TO, INSULATING MATERIAL, TALC, SOAPSTONE, APRONS, TRAYS FOR HOT KNIVES, etc.) WERE PRESENT IN THE VICINITY OF EMPLOYEES WORKING AT THE BANBURY AT DEFENDANT'S TIRE PLANTS IN SUMMIT COUNTY, OHIO AREA BETWEEN 1939 AND THE PRESENT.

ANSWER:
YES

41 ANSWER:
SEE ANSWER TO INTERROGATORY NO. 17
(A) STEAM PIPE INSULATION
TALC (SOAPSTONE)
(B) TALC WAS USED AS A DE-TACKIFIER. THAT IS TO SAY THAT IT WAS USED TO KEEP RUBBER PRODUCTS FROM STICKING TOGETHE STEAM PIPES WERE INSULATED WITH ASBESTOS-CONTAINING INSULATION.
(C) SEE ANSWER TO No. 9 FOR SUPPLIERS OF TALC.
(D) 500 SOUTH MAIN STREET, AKRON, Ohio 44318.

41 If the answer to the foregoing interrogatory is in the affirmative, state:

A. The type of asbestos product used (e.g., pipe insulation, soapstone, etc.).

B. The purpose for which it was used.

C. The name and manufacturer of said product(s).

D. The plant(s) at which said product was used and the years during which it was used.

ANSWER: See answer to Interrogatory No. 17

42. Did the defendant employ any individuals in its Summit County, Ohio, area tire plants between 1939 and the present, whose job responsibilities included installation and repair of insulating material, including asbestos.

ANSWER: Yes.

Quinn, Smith, Gore
& Goldsmith
South Main Street
Suite 303
Akron, Ohio 44308
Area Code 216
434-7167

43. If the answer to the foregoing interrogatory is in the affirmative, state:

A. The name and address of said individual(s) and the years during which said services were performed for the defendant

B. The nature of the insulation work performed.

C. The plants at which said work was performed.

D. The names and manufacturers of the products containing asbestos.

E. The name, address, and job title of the individual in the employ of the defendant who is most knowledgeable regarding installation or repair of asbestos containing products by defendant's employees.

ANSWER: Objection. See introductory statement. Further, this Interrogatory asks for information unrelated to any stated or legitimate objective of a Complaint for Discovery. In addition, this Interrogatory is overly burdensome. Without waiving said objection, Goodrich volunteers the following information:

Richard Rhoten
Area Engineer,
Facilities Powerhouse
The BFGoodrich Company
500 S. Main St.
Akron, Ohio 44318

Dennis Oleksuk
Manager, Akron Facilities
The BFGoodrich Company
500 S. Main Street
Akron, Ohio 44318

44. Does the defendant maintain records which include the floor plans indicating where various tire producing processes (e.g., the banbury, the curing room, etc.) were stationed in its tire plants in the Summit County, Ohio, area.

ANSWER: Some building floor plans have been retained; however, many have been destroyed.

45. If the answer to the foregoing interrogatory is in the affirmative, state the name, address, and job title of the individual in the employ of the defendant who is presently in custody of said floor plans.

ANSWER:

Jerry Meadows, Plant Engineer
Aircraft Tires
The BFGoodrich Company
500 S. Main Street
Akron, Ohio 44318

46. State the name(s), address, and job title of the individual(s) presently in custody of plaintiff's work and medical records, including but not limited to, wage and assignment information, job performance and evaluation, and information regarding the identity of his supervisors or foremen.

ANSWER: Objection, defendant has produced the medical records of plaintiff.

47. State whether the defendant, either through its own employees or independent contractors, has undertaken to remove insulation products containing asbestos from any of its tire plants in the Summit County, Ohio, area since 1975.

ANSWER: Yes.

48. If the answer to the forgoing interrogatory is in the affirmative, state:

A. The name and address of the entity performing said removal.

B. The time and place (including plant and specific location) of said removal.

C. The purpose for the removal.

D. The name, description, and manufacturer of the products which were removed, if known.

E. Whether the removal was conducted in accordance with EPA, OSHA or other guidelines (please specify)

ANSWER:

A. Holub Iron and Steel
Akron, Ohio

The Ruhlin Company
Akron, Ohio

The Beaver Excavating Company
Canton, Ohio

Broadway Wrecking Company
Cleveland, Ohio

B. 1979 through 1985 at various buildings throughout the Akron tire manufacturing area.

C. Demolition and partial removal of several buildings. Equipment relocations and removal

A. RUSSELL SMITH

STEPHEN J. BROWN

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Interrogatories have been forwarded by regular U.S. Mail this [illegible] day of January, 198[illegible]

D. Unknown

E. All removal was in accordance with EPA regulations and the appropriate filings were made as required under 40 CFR Part 61 of U.S. EPA's regulations on National Emission Standards for Hazardous Air Pollutants, Subpart B, Paragraph 61.22(d)(2).

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing document was served upon A. Russell Smith, Esq., 159 S. Main Street, Suite 503, Akron, Ohio 44308 by regular U.S. mail, postage prepaid, this 20th day of May, 1987.

Jeffrey J. Casto

VERIFICATION

Sally Henning, being first duly sworn according to law, states that the Answers to the foregoing Interrogatories are true and correct based upon either her own personal knowledge or information supplied to her by others upon whom she reasonably relies.

_____
Sally Henning

STATE OF OHIO)
) SS:
COUNTY OF SUMMIT)

SWORN TO before me and subscribed in my presence this _____ day of May, 1987.

_____
Notary Public