

- (a) The date each type of package was used;
- (b) A physical description thereof, including the size of the package, color, and size of any lettering on the package, including warnings of any kind; and
- (c) A description of any printed material or trademarks that appeared on or in said package, including a verbatim statement of any warnings or cautions; and
- (d) The name(s) of the most knowledgeable person(s) concerning the packaging of the asbestos and asbestos products.

RESPONSE:

PRODUCT PACKAGING

Asbestos containing pipe covering and block were placed in Kraft cardboard boxes. Asbestos cements were sold in multi-ply Kraft paper bags or heavy duty, polyethylene bags. Asbestos cloth was rolled, wrapped in laminated kraft paper, tied with tape or twine, and placed in burlap tubing. In later years, reinforced paper was used in place of burlap tubing.

Asbestos yarns were wound on paper tubes and shipped in fiberboard cartons or wooden boxes. Depending on the specified size, asbestos tubing was either wound on spools or cut to specified lengths, and placed in fiberboard cartons. Asbestos tape was rolled, bound with twine, and placed in fiberboard cartons.

Asbestos sheeting was rolled on tubes then wrapped in laminated kraft paper, tied with tape then placed in fiberboard cartons with paper lining between each roll. Larger sheets, which were individually wrapped in kraft paper, were placed in corrugated fiberboard cartons or placed in wooden crates.

Printing on the cartons or bags usually included the J-M logo, the name "Johns-Manville", the product name, the size and the weight. Additional language may have been used from time to time. Some photographs and product literature are located at the document repository maintained by the Fund in Denver, Colorado, and will be produced at a time agreed upon by the parties.

In addition, warning labels were placed on packaging of asbestos containing products beginning in 1964 as set forth below.

Also, the Fund has in its possession finished product specifications and purchase specifications for various asbestos containing products which describe the packaging of each product in detail, any alterations thereto, and the physical description thereof, including placement of warning labels. These specifications will be produced at the records repository maintained by the Fund in Denver, Colorado, at a time agreed upon by the parties.