



AFFIDAVIT

LAWRENCE J. KEATING, being first duly sworn according to law, deposes and says that:

1. I am employed by Armstrong World Industries, Inc., formerly Armstrong Cork Company, as an attorney.
2. I have been an employee of Armstrong World Industries, Inc. for over nine years and have been involved in the capacity of an attorney in the Legal Department with the asbestos litigation since 1978.
3. The information contained in the attached list is based upon my information, belief, review of records by company employees, and discussions with fellow employees.
4. This attached list represents what was prepared in response to discovery for the Armstrong's Asbestos Insurance Litigation, in an effort to encompass all asbestos products related to the asbestos litigation.

Further affiant saith not.



LAWRENCE J. KEATING

Sworn to before me and subscribed in my presence this 15th day of Nov. , 1987.



Nan L. Engle
Notary Public
NAN L. ENGLE
Last Exp. Date: 12/31/90
My Comm. Expires: 12/31/90

1. Insulation Products

Armstrong entered into the insulation contracting business in about 1903. Since that time,*/ Armstrong manufactured three asbestos-containing insulation products, and various related sundry products. Starting in about 1939, Armstrong also sold and installed other asbestos-containing insulation products in connection with its contract installations up to December 31, 1957.**/ The relevant products are broken down below by type, manufacturer, and years of manufacture, sales and installation:

<u>Insulation Product Type</u>	<u>Manufacturer (Product Name)</u>	<u>Years Sold/Installed</u>
Diatomaceous Earth	Armstrong Cork Company (Nonpareil High Pressure Covering, Block, and Cement)***/	Manufactured, sold, and installed 1910-1933
Cork	Armstrong Cork Company (LT Cork Covering)	Manufactured, and sold 1956-59 (installed 1956-57)****/

*/ For the period 1914-38, insulation products manufactured by Armstrong Cork Company were sold and installed by Armstrong Cork & Insulation Company, later known as Armstrong Cork Products Company. In 1938, the assets of this wholly-owned subsidiary were distributed back to Armstrong Cork Company, and shortly thereafter it was dissolved.

**/ A wholly-owned subsidiary of Armstrong, Armstrong Contracting and Supply Corporation, sold and installed asbestos-containing insulation products after December 31, 1957. Armstrong sold that subsidiary in 1969. This response does not include products sold or installed by Armstrong Contracting and Supply Corporation (except to the extent that Armstrong sold such products to Armstrong Contracting and Supply Corporation).

***/ Available records indicate that Armstrong probably manufactured Nonpareil block and cement during some or all of the period from 1910-1933.

****/ LT Cork Covering was also manufactured at other times. Only the product manufactured during the period 1956-1959 contained asbestos, however.

<u>Insulation Product Type</u>	<u>Manufacturer (Product Name)</u>	<u>Years Sold/Installed</u>
Mineral Wool	Armstrong Cork Company (Armaspray)	Manufactured and sold 1966-68, with sales con- tinuing to mid-1969
85% Magnesia	Keasbey & Mattison (Pipe Covering & Block)*/ Ehret Magnesia Manufacturing Co. (Pipe Covering)**/	1939-1956 1945-1956
Calcium Silicate	Keasbey & Mattison (Katherm Block) Owens-Illinois Glass Co. (Kaylo Pipe Covering & Block)	1953-1957 1956-1957
Paper or Felt	Keasbey & Mattison (Air Cell Pipe Covering & Block & Sheets) Keasbey & Mattison (Bestfelt Pipe Covering & Block & Sheets) Keasbey & Mattison (Duplex Woolfelt Pipe Covering) Keasbey & Mattison (Mani-Ply Pipe Insulation)	1945-1956 1945-1956 1945-1955 1945-1950
Sodium Silicate	Keasbey & Mattison (Kamatt Pipe Covering) UNARCO (Armabestos Pipe Covering & Block)	1948-1950 1954-1957
Cements	Keasbey & Mattison (cements -- various names) Baldwin-Hill (Mineral Wool Cement)	1945-1956 No Knowledge

* / Sometimes used with an inner layer of Hy-Temp pipe covering and block, a diatomaceous earth and asbestos product.

** / Sometimes used with an inner layer of calcium silicate.

<u>Insulation Product Type</u>	<u>Manufacturer (Product Name)</u>	<u>Years Sold/Installed</u>
Cements (cont.)	Eagle-Picher (Armatemp #166 Cement)*/ <u></u>	1955-1957
Sundries	Finishes, sealers, emulsions, and mastics (manufactured by Armstrong and others)	1930-1957
	Keasbey & Mattison (millboard, rollboard, and floats)	1939-1957

2. Description of Physical Appearance
of Insulation Products

Armstrong presently has no information concerning the physical appearance of Nonpareil High Pressure Covering, Block, or Cement. The covering was a diatomaceous product with asbestos added.

LT Cork Covering consisted of precision cut segments of cork board adhered to a backing of aluminum foil with an outer covering of asbestos paper.

Armaspray, a spray-on insulation, was granular and gray in color.

85% Magnesia Pipe Covering & Block was molded. The pipe covering was furnished in 3' sections (split horizontally) and furnished with a factory-applied canvas jacket, forming a hinge and lap. The block was furnished in 3' x 6" x 1½" segments.

Hy-Temp Pipe Covering & Block was molded. The pipe covering was furnished in 3' lengths of tubular half sections in thicknesses from 1" to 3" for pipe sizes ½" to 10" in diameter. The block was furnished in 3' lengths and 3", 6", 9" and 12" widths with thicknesses from 1½" to 4".

Armabestos, a molded pipe covering and block, was a grayish, hard substance. The pipe covering was furnished in 3' lengths in thicknesses

*/ Armstrong records do not indicate that this product contained asbestos. Eagle-Picher apparently has records that suggest that the product contained asbestos.

from 1" to 5" for pipe sizes $\frac{1}{2}$ " to 24" in diameter. The block was furnished in 3' lengths and 6", 12", 18" or 36" widths with thicknesses from 1" to 3". Kamatt, a molded pipe covering, was furnished in 3' lengths and thicknesses of 2", $2\frac{1}{2}$ ", or 3" for all pipe sizes over 12" in diameter.

Kaylo, a molded pipe covering and block, was rigid, preformed, and white in appearance. Kaylo-20 was colored pink with iron oxide for identification purposes. The pipe covering was furnished in 3' lengths and thicknesses from 1" to 3" for pipe sizes $\frac{1}{2}$ " to 39" in diameter. The block was furnished in 18" or 36" lengths and 3", 6", 12" or 18" widths with thicknesses from 1" to 3". Calcium Silicate Pipe Covering, a molded material, was available for pipes 2" or greater in diameter. Kaytherm Block was precision molded and gray colored. It was furnished in 3' lengths by 6" widths with thicknesses of $1\frac{1}{2}$ " or 2".

Mani-Ply Insulation, a pipe covering, was furnished in 3' lengths in thicknesses of 1", $1\frac{1}{2}$ " or 2". Bestfelt Pipe Covering was furnished in 3' lengths of 1" standard thicknesses for pipe sizes $1\frac{1}{2}$ " to 24" in diameter. The Bestfelt Block and Sheets were furnished in 3' lengths and 6", 9", 18" or 36" widths with thicknesses from $\frac{1}{2}$ " to 4". Air Cell Insulations were available in pipe covering, sheet, or block form. The pipe covering was furnished in 3' lengths and thicknesses of $\frac{1}{2}$ " to 1", for pipe sizes $\frac{1}{2}$ " to 6" in diameter. The sheets and block were furnished in 6", 9", 12", 18", 36" or 72" lengths and 3" widths, with thicknesses from $\frac{1}{2}$ " to 4".

All of the Cements were sold in powder form.

K. P. Asbestos Floats were sold in powder form.

Armstrong presently has no information concerning the physical appearance of Keasbey & Mattison millboard and rollboard.

Finishes, sealers, emulsions, and mastics had a thick, trowelable consistency.

3. Other Products

Armstrong has also manufactured non-insulation products in which asbestos fiber is locked into the material at its plants in Lancaster, Pennsylvania; Kankakee, Illinois; Fulton, New York; Jackson, Mississippi; South Gate, California; Camden, New Jersey; and Braintree, Massachusetts. These products include vinyl asbestos tile, asphalt tile, hydrocord flooring felt, certain adhesives and sheet gasketing material, a ring-facing material, and an ablation material. Armstrong also purchased asbestos board, a sundry ceiling item, for resale to others.*/

*/ For a short period of time, this material was also used as a roofing product.