

**PLAINTIFF'S
EXHIBIT**

K-955

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY, PENNSYLVANIA

R. BRUCE RYAN and DONA
RYAN, his wife,

Plaintiffs,

vs.

GAF CORPORATION, RAYMARK
INDUSTRIES, INC., CELOTEX
CORPORATION, successor-in-
interest to Philip Carey
Manufacturing Company, Philip
Carey Corporation, Briggs
Manufacturing Company and/or
Panacon Corporation, KEENE
BUILDING PRODUCTS CORPORATION,
EAGLE-PICHER INDUSTRIES, INC.,
OWENS-CORNING FIBERGLAS
CORPORATION, OWENS-ILLINOIS,
INC., GARLOCK, INC., PITTSBURGH
CORNING CORPORATION, ARMSTRONG
WORLD INDUSTRIES, INC., NICOLET
INDUSTRIES, INC., successor-in-
interest to Keasby & Mattison,
COMBUSTION ENGINEERING, INC.,
FIBREBOARD CORPORATION, CAREY-
CANADA, INC., ANCHOR PACKING
COMPANY, STANDARD ASBESTOS
MANUFACTURING & INSULATING
COMPANY, FLEXITALLIC GASKET
COMPANY, GENERAL ELECTRIC
COMPANY, Wire and Cable
Products Department, and
MARMON GROUP, INC., successor-
in-interest to Cerro Wire &
Cable Company, Division of
Cerro Marmon Co., and the
Rockbestos Company, Inc.,

Defendants.

CIVIL DIVISION

No. 152 of 1986

JURY TRIAL DEMANDED

DEFENDANT, EAGLE-PICHER
INDUSTRIES, INC., ANSWERS TO
PLAINTIFFS' INTERROGATORIES
AND REQUEST FOR PRODUCTION

Filed on Behalf of:

EAGLE-PICHER INDUSTRIES,
INC., Defendant

Counsel of Record for This
Party:

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A. The date such activity began;

B. The years during which such activity took place;

C. The date when such activity was terminated;

A. - C.: See Exhibit I and II.

The Company began the manufacture of asbestos-containing insulation products in 1930.

D. If such activity was terminated, the reason why; and,

See page 13(a).

E. The geographical area into which you claim the asbestos-containing product(s) were sold.

These products were used throughout the U.S. and Canada; occasionally there were export shipments.

14. For the period 1930 to date, state the addresses and business telephone numbers of each facility, building, mine, mill or location which was used by you as a mining, milling, manufacturing, processing, distribution or marketing facility for asbestos-containing products, state the inclusive dates each such facility was in operation, and further state its function (e.g., manufacturing, warehousing finished products, sales office, etc.).

See page 13(a)

15. Please list each asbestos-containing product mined, manufactured, sold, marketed and/or distributed by Defendant, Defendant's predecessors, and/or Defendant's subsidiaries at any time since 1930; and please state the following for each named product:

A. The year it was first mined, manufactured, sold, marketed, or distributed, and if discontinued, the year and the reason such mining, manufacture, sale, marketing or distribution stopped;

- B. The years during which the product was mined, manufactured, sold, marketed or distributed;

A. - B. See Exhibits I and II as well as Answer to No. 11 (A-D).

- C. Which unit of Defendant, predecessor or subsidiary, mined, manufactured, sold, marketed and/or distributed the product;

See Answer to No. 11(E).

- D. Whether or not said product was ever manufactured, sold, marketed or distributed in the Commonwealth of Pennsylvania and the time period during which such manufacture, sale, marketing or distribution took place; and

The Company does not have such information for each year. However, for a listing of asbestos-containing insulation products sold to or shipped to customers in Pennsylvania by the Company, beginning in 1965 and for 1961, see Exhibit IV, which was prepared from available invoices only. The Company has no sales invoices prior to 1965, except for some invoices for 1961 and a few miscellaneous invoices received through litigation. Sales data are based on the Company's fiscal year which is December 1 through November 30.

- E. The plants and address(es) at which the product was mined or manufactured.

See Answer to No. 14.

16. Please list each asbestos-containing product mined, manufactured, sold, marketed and/or distributed by Defendant, Defendant's predecessors, and/or Defendant's subsidiaries at any time since 1930; and state the following for each named product:

- A. Its generic name;

- B. Its trade or brand name;

- C. Any common, popular or slang names by which the product was referred, as well as the type of product involved (e.g., pipecovering, cement, etc);

A. - C.: See Exhibits I and II. The Company did not refer to its products by slang names.

- D. Its chemical composition (include the specific asbestos fiber type(s) - e.g., amosite, chrysotile, or crocidolite - and percentage by weight of each asbestos fiber type contained in the product, as well as identify the percentage by weight of all other ingredients of the product);

See page 15(a) and (b).

- E. The intended use of the product, including the temperature ranges for which the product was recommended;

See page 15(b) and (c).

- F. The form in which the product was shipped (i.e., burlap bags, paper bags, drums, cardboard boxes, wooden crates, etc.), including the size and amount of the container;

See page 15(c).

- G. The name of the company mining, manufacturing, marketing and/or selling said product, if not Defendant;

See page 15(d).

- H. A detailed description of the intended method of preparation and application of the product;

See page 15(d).

- I. A description of the physical appearance of the product, including size, shape, color and texture;

See Exhibits I and II.

Super "66" Insulating Cement was gray and One-Cote Finishing Cement was off-white to white.

See also Answer to No. 16(H).

Answer to No. 16D

Defendant objects to this portion of the interrogatory for it is overly broad, unduly burdensome, irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection, see Exhibits I and II.

According to the Company's annual cost of production accounting records, the approximate asbestos content of the insulation products formerly manufactured by the Company was as follows:

<u>Product</u>	<u>Approx. Asbestos Content (by Weight) Percentage</u>	
CEMENTS:		
Super "66" Insulating Cement	8.8 to 12.0	(1930 - 1934)
	8.5 to 10.0	(1935 - 1963)
	4.0 to 4.4	(1964 - 1968)
	3.5 to 3.6	(1969 - Sept. 1971)
"43" Finishing Cement	73.0 to 76.3	(1944 - 1971)
	75.7	(Jan. and April 1972)
Fireproofing Cement	3.5 to 3.6	(1948 - 1960)
	2.8 to 3.1	(1961 - 1965)
One-Cote Finishing Cement	3.3	(1960)
	4.8 to 6.3	(1961 - 1967)
	2.8 to 3.2	(1968 - Sept. 1971)
Hylo Finishing Cement	4.8 to 5.5	(1963 - 1967)
	2.7 to 6.9	(1968 - Sept. 1971)
Hi-Stick Insulating Cement	4.3 to 6.3	(1964 - 1969)
"33" Insulating Cement	7.8 to 10.8	(1935 - 1944)
	13.8 to 14.7	(1945 - 1949)
"99" Finishing Cement	72.2 to 82.6	(1935 - 1962)
"106" Finishing Cement	25.2 to 28.5	(1948 - 1962)
"111" Finishing Cement	2.1 to 3.7	(1935 - 1966)
"330" Insulating Cement	8.9 to 10.0	(1939 - 1940)
		(1942 & 1945)
"1003" Finishing Cement	14.16 to 16.2	(1955 - 1956)
	8.3 to 8.8	(1958 - 1959)
Navy Special Cement	11.9	(1945 only)
MASTICS:		
Insulseal	16.8 to 20.8	(1935 - 1968)
Insulseal-All Purpose	6.0 to 6.9	(1968 - 1969)
Insulstic-Trowel Grade	12.5 to 16.0	(1939 - 1962)
Insulstic-Brush Grade	7.1 to 16.4	(1942 - 1953)
	7.5 to 13.5	(1957 - 1959)
Swetchek	1.6 to 11.3	(1945 - 1947)
	1.5 to 1.9	(1948 - 1961)

Answer to No. 16D continued

<u>Product</u>	<u>Approx. Asbestos Content (by Weight) Percentage</u>	
BLOCK:		
Vercel Block	4.1 to 7.5	(1937 - 1944)
DE 85 Block	4.2 to 10.3	(1947 - 1953)
DE 95 Block	9.7	(1949)
	4.0 to 9.1	(1950 - 1953)
Supertemp Block	1.0 to 4.0	(1938 - 1940)
	0.3 to 1.6	(1941 - 1945)

The products sold, but not manufactured, by the Company contained chrysotile asbestos, except Hylo Block and Pipe Covering which was produced by Owens-Corning Fiberglas, and which at times contained Chrysotile and amosite asbestos. The company is uncertain what type of asbestos 85% Magnesia Pipe Covering and Block Insulation contained.

The Company used only chrysotile asbestos in asbestos-containing insulation products it formerly manufactured, except for D.E. Block, which contained chrysotile and amosite asbestos.

The percentage of asbestos in each asbestos-containing insulation product which the Company formerly sold, but did not manufacture, may be available from the manufacturer.

Answer to No. 16E

See Exhibits I and II.

The Company's asbestos-containing insulation products were intended for a number of high temperature industrial insulation applications. High temperature applications require products designed for service temperatures in excess of 800°F.

The products were intended to be used and handled by the insulation workers in the manner which was standard to their trade.

According to presently available product brochures, which were used as sales aids and were supplied from time to time, the following were the service temperatures for the various insulation products (including protective coatings) for which information is available:

<u>Product</u>	<u>Service Temperature</u>
Super "66" Insulating Cement	to 1800°F
"43" Finishing Cement	to 1000°F
Fireproofing Cement	to 2000°F
One-Cote Finishing Cement	to 1200°F

Asbestos-Containing Insulation Products Sold (but not manufactured)
By Eagle-Picher Industries, Inc.

Product Name (Source)	Date Began/Discontinued Sales	Description	Contents
Spray Mastic (APCO Oil)	1960/1974**	Weather-protective coating.	Petroleum Asphalt, Clay, Asbestos
Insulseal (APCO Oil)	1969/1974**	Tough black protective coating for insulation.	Emulsified Asphalt, Asbestos, Bentonite Clay, Water, Carbon Black, Methyl Alcohol
Insulstic (Carey)	1963/1974	Adhesive material used to temporarily hold in place and to speed the application of rigid and semirigid insulation.	Asbestos, Sodium Silicate
Stalastic (Southwest Grease and Gibson-Homans)	1937/1974*	A weather and vapor-barrier coating.	Petroleum Asphalt, Asbestos, Clay, Calcium Carbonate
Stamastic (Southwest Grease)	1937/Approx. 1968	Same as Stalastic, immediately above.	Same as Stalastic
Swatchek (Carey)	1962/Approx. 1966	A weather-protective and anticondensation compound.	Emulsified Asphalt, Asbestos, Bentonite Clay, Water, Carbon Black, Methyl Alcohol
Carey-Temp Block and Pipe Covering (Carey)	1956/1960	Molded rigid block or pipe covering.	Perlite, Asbestos, Clay, Sodium Silicate
Hylol Block and Pipe Covering (Owens-Corning)	1960/1969 1972/1972	Molded rigid block or pipe covering.	Calcium Silicate, Clay, Asbestos, Diatomaceous Earth

Product Name (Source)	Date Began/Discontinued Sales	Description	Contents
Hylo block and pipe covering (GAF)	1969/1971	Same as Owens-Corning Hylo, immediately above.	Same as Owens-Corning Hylo
Hylo 20 or 7M Asbestos Corp., arey Canadian, GAF)	1934/1969	Insulation Cement Ingredient	Chrysotile Asbestos Fiber
11" Insulating Cement (J-M)	1950/1968	Vermiculite base insulating cement used on masonry surfaces, primarily in the steel industry.	Vermiculite, Asbestos, Clay
11" Magnesia Pipe Covering and Insulation (arey & Others)	1956/1960	Insulating block and pipe covering.	Magnesium Carbonate and Asbestos

Statlastic was discontinued from our general product line on December 1, 1974. However, special orders were accepted in 1975 through late March, 1978. The Company performed a sales agent function only in 1975-1978.

Spray Mastic and Insulseal were discontinued from our general product line on December 1, 1974. However, in 1975 small quantities were sold pursuant to special requests.

ptember, 1986

Asbestos-Containing Insulation Products Manufactured By Eagle-Picher Industries, Inc.

Product Name	Date Began/Discontinued Manufacture	Description	Contents
Per "66" Insulating Cement	1930/1971	Dry bulk cement composed of Eagle-Picher granulated mineral wool thoroughly blended with suitable binding, rust inhibitive, and plasticizing ingredients.	Granulated fiber, Bentonite Clay, Tri-Sodium Phosphate, Sodium Nitrite, Sudsing Agent; Asbestos
Coate Finishing Cement	1960/1971	Dry bulk cement composed of Eagle-Picher mineral wool and diatomaceous earth, thoroughly blended with suitable binding, rust inhibitive, and plasticizing ingredients.	Granulated Mineral Wool, Bentonite Clay, Sodium Nitrate, Portland Cement, Diatomaceous Earth, Asbestos
Seeproofing Cement	1948/1965	Dry bulk high temperature cement composed of asbestos fiber and Bentonite clay thoroughly blended with suitable binding, rust inhibitive, and plasticizing ingredients.	Granulated Mineral Fiber, Asbestos, Diatomaceous Earth, Lumnite or Portland Cement, Bentonite Clay, Fire Clay, Sudsing Agent, Sodium Nitrate, Tri-Sodium Phosphate, Glass Fiber (1962 to 1965 only)
Finishing Cement	1944/1971*	Durable hard white finish coating for indoor insulation on heated surfaces.	Asbestos, Portland Cement
Insulating Cement	1935/1949	Vermiculite base insulating cement used on masonry surfaces, primarily in the steel industry.	Vermiculite, Clay, Asbestos

*Small quantities of "43" were manufactured and shipped in January and April, 1972 pursuant to special orders.

Product Name	Date Began/Discontinued Manufacture	Description	Contents
Finishing Cement	1935/1962	Hard, durable finishing cement used primarily as a finish over other insulation.	Diatomaceous Earth, Asbestos, Clay, Calcium Sulfate
Finishing Cement	1948/1962	Hard, Fire-protective finishing cement for indoor and outdoor use.	Lumite Cement, Asbestos, Clay
High Temperature Cement	1935/1966	Diatomaceous Earth aggregate base product (to 2300°F) used as a refractory insulating material.	Diatomite Aggregate, Fire Clay, Asbestos, Bentonite Clay
Finishing Cement	1963/1971	Same as One-Cote Cement	Granulated Mineral Wool, Diatomaceous Earth, Bentonite Clay, Asbestos, Portland Cement, Sodium Nitrate, Sudsing Agent
Stick Insulating Cement	1964/1969	Insulating Cement specially formulated to give maximum adhesion to valves and fittings.	Granulated Mineral Wool, Bentonite Clay, Sodium Nitrite, Sudsing Agent, Portland Cement, Asbestos
Emulal	1935/1969	Tough black protective coating for insulation, composed of asbestos, clay, and other additives in an asphalt base.	Emulsified Asphalt, Asbestos, Bentonite Clay, Water, Carbon Black, Methyl Alcohol

Product Name	Date Began/Discontinued Manufacture	Description	Contents
Insulating	1939/1962	Adhesive material used to temporarily hold in place and to speed the application of rigid and semirigid insulation.	Asbestos, Sodium Silicate
Sealant	1945/1961	Asphaltic base compound used to prevent condensation.	Asphalt, Alcohol, Asbestos, Calcium Carbonate
Seal Block	1937/1944	Vermiculite insulating block for use up to 1400°F.	Vermiculite, Clay, Asbestos, Magnesium Sulfate
Supertemp Block	1938/1945	Dark gray mineral wool insulating block composed of Eagle-Picher Mineral Wool and suitable binding agents and formed into semirigid shapes with square corners and parallel faces.	Mineral Wool Tufts, Linseed Oil, Asbestos ¹ , Bentonite Clay, Magnesium Sulphate, Starch, Sodium Silicate
E 85" Block	1947/1953	Rigid type Diatomaceous Earth block used on a variety of heated equipment with temperatures up to 1300°F.	Diatomite, Lime, Perlite Asbestos, White Plaster
E 95" Block	1949/1953	Diatomaceous Earth block used principally on heating surfaces exposed to higher temperature range (to 2000°F)	Diatomite Aggregate, Plaster, Lime, Venetian Red Dye, Asbestos

NOTE: Several of the products listed were also packaged under private labels.

The Company's year end cost of production accounting records reveal that a small percentage of chrysotile asbestos fiber is charged against a product known as "Supertemp Block." However, former plant managers of the Company deny that the product ever contained asbestos fiber.

Notes:

1. Navy Grade and Navy Special Insulating cements were produced in 1943, 1955, 1956, 1958 and 1959. These products were "Super 66" types with a higher asbestos fiber content.
2. "330" Insulating cement was produced in 1939, 1940, 1942 and 1945. This was a duplicate of the "33" cement formula.
3. "1003" cement was produced in 1947 only.
4. From time to time the Research group developed experimental cement products containing asbestos fiber. Quantities were quite small and used primarily for in-house test evaluation. The products concerned, indicating the year of experimentation, are as follows:

Firekote (1942)	Insulac (1939)
Coprtek (1939)	Drycote (1945)
Castable Cement (1969)	Superfill "A" (1967)
Superfill "P" (1968)	
5. Hi-Temp Corrosion Resistant Paint, a mixture of Hi-Temperature Stalaastic and methylene chloride was produced in small quantities in 1969 and 1971. The addition of methylene chloride simply diluted the Stalaastic to a "brush-on" viscosity.

<u>Product Designation</u>	<u>Private Label Designation</u>	<u>Company</u>	<u>Agreement Dates</u>	<u>Sales Dates</u>
16" Insulating Cement	A. P. Green Insulating Cement* C-18 Insulating Cement* CC-660 Insulating Cement** SC-40 Insulating Cement* FPMCO Mineral Wool Insulating Cement Staxon Cement* Fitch #1 Armstrong No. 166** MW-50** H. W. Insulating Cement Unarco No. 330 Cement** Mineral Wool Insulating Cement, Grade 313* General Refractories Insulating Cement	A. P. Green Fire Brick Co. Bigelow-Liptak Corporation Owens-Corning Fiberglass, Supply and Contracting Division Owens-Corning Fiberglass, Supply and Contracting Division Fiberglass Engineering Co. North American Refractories Co. Fitch Recuperator Co. Armstrong Contracting & Supply Div. Phillip Carey Harbison-Walker Union Abbestos & Rubber Co. GAP General Refractories Co. H. K. Porter, Refractories Div. Babcock & Wilcox, Refractories Div.	5/1/48 to 8/16/71 5/5/49 to 8/16/71 1958 to date unknown 12/26/57 to 8/16/71 3/15/62 to date unknown 1956 to 1968 2/24/53 to 1/1/57 8/1/57 to date unknown 12/11/70 to 5/26/71 6/16/49 to date unknown	1949 - 1971 1949 - 1971 1958 - 1967 1967 - 1971 1953 - 1958 1958 - 1971 1939 - 1955 1957 - 1971 1958, 1966, 1967 1953 - 1958 1953 - 1962 1971 1949 - 1971 1966 - 1971 1966 - 1971
Insulating Cement	Fitch #2	Fitch Recuperator Co.		1940 - 1941, 1943 - 1946, 1948 - 1950

"41" Finishing Cement	C-10 Cement* SS-11 White Finishing Cement*	Bigelow-Liptak Corp. A. P. Green Fire Brick Co.	5/5/49 to 8/16/71 5/1/49 to 8/16/71	1949-1961, 1966 1952, 1954, 1956 - 1970
One-Cote Cement***	OC-110** SC-30* M-1** Armstrong No. 10** FC-11* Insul-Finish* SS-10 Insulating & Finishing Cement* Unicote Cement* Unarco No. 10 Cement** Single Cote Insulating Cement, Grade 412*	Owens-Corning Fiberglas, Supply and Contracting Division Owens-Corning Fiberglas, Supply and Contracting Division Philip Carey Armstrong Contracting & Supply Div. Bigelow-Liptak Corp. General Refractories Co. A. P. Green Fire Brick Co. North American Refractories Co. Union Asbestos & Rubber Co. GNF H. K. Porter, Refractories Div. Babcock & Wilcox, Refractories Div.	1958 to date unknown 1956 to 1968 3/15/62 to date unknown 5/5/49 to 8/16/71 6/16/49 to date unknown 5/1/49 to 8/16/71 12/26/57 to 8/16/71 8/1/57 to date unknown 12/11/70 to 5/26/71	1960 - 1967 1967 - 1971 1966 1962 - 1971 1960 - 1971 1960 - 1965 1967 - 1970 1960 - 1970 1960-1966, 1970 1960 - 1962 1971 1966 - 1967 1966 - 1968

* Exclusively Eagle-Picher's product

** Not exclusively Eagle-Picher's product

*** One-Cote cement did not contain asbestos prior to 1960.

1/6/87

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