

These responses are from AWI's records and knowledge and not those of its former wholly-owned subsidiary, Armstrong Contracting & Supply Corporation (hereinafter ACandS), which operated independently of AWI.

Although AWI manufactured Nonpareil asbestos-containing insulation materials from 1910 until 1929, AWI is not aware of any current personal injury claims with respect to those products; thus, no answers are given concerning those products.

AWI's Contract Department expanded into the high temperature insulation contracting field at the beginning of World War II, and AWI last sold an asbestos-containing insulation product in mid-1969. The responses set forth herein are limited in time and place to asbestos-containing thermal insulation products to which plaintiffs may allege exposure and which were manufactured or sold by AWI during this time period.

Because virtually all cases against AWI refer to insulation products, no answer is made concerning floor products, gasket materials, roofing products, adhesives, board or other non-insulation products.

To the extent this interrogatory or request calls for information beyond this limitation, an objection is made thereto as being irrelevant, immaterial, burdensome, oppressive and/or not calculated to lead to the discovery of admissible evidence. To the extent the information contained herein differs in any respect from any prior responses to discovery, this response shall be deemed to update and supersede such prior responses.

This statement is incorporated by reference in each of the following responses.

Documents which may expand upon these responses are available for inspection. An index is available.

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Q10. If your company ever manufactured or sold any of the following types of asbestos products, please identify each product and describe how it is cut, shaped, mixed and applied on the job:

- a. asbestos cement mixes;
- b. asbestos pipe covering;
- c. asbestos bricks or blocks;
- d. asbestos sheeting, boards or marinite;
- e. asbestos insulation used to protect against extremes of heat as well as cold;
- f. asbestos insulation in loose form which may be blown into homes or buildings;
- g. asbestos applied in spray form;
- h. asbestos tape, cloth, yarn, thread or tape;
- i. asbestos felt or blanket;
- j. asbestos paper;
- k. asbestos gaskets;

giving particular reference as to whether or not the materials have been sawed or cut on the job, blown into confined areas, or mixed with water into a cement or paste.

~~ANSWER:~~ See General Objection, Statement and Limitations. Additionally, see Attachment A. LT Cork Covering was occasionally cut or sawed to assure proper fitting around pipes. Armaspray was mixed with water and applied in wet form by a specially designed applicator. The balance of the pipe covering and block insulation identified in Attachment A was factory molded or shaped in various lengths in order to allow for custom fitting, thereby reducing the need for cutting at the job site. Cements were mixed with water before

application. Documents which may expand upon these responses are available for inspection. An index is available.

Q11. Please state if there is any way known to you that the products listed in questions 9 and 10 can be used, applied or installed without the worker involved inhaling any asbestos dust or fibers.

ANSWER: Objection. This interrogatory contains an implicit assumption of matters not otherwise established, which renders the interrogatory as argumentative, incapable of fair and correct answer, and without foundation. Without waiving same and subject thereto, AWI states that since the beginning of World War II, AWI manufactured only two asbestos-containing thermal insulation products. LT Cork Covering, which contained only a small percent of asbestos in the outside paper wrapper and was used as low temperature insulation, was sold from 1956-1959. Judge Robert M. Parker granted Judgment N.O.V. in Gracedel v. Fibreboard Corporation, et al (E.D. Texas June 13, 1982) (Order attached) denying Plaintiff's claims that LT Cork Covering was defective in design and marketing and holding that AWI "shall not be liable to the Plaintiff for any exposure to Plaintiff, if any, from LT Cork Covering."

For Armaspray, manufactured and sold only from August 1966 until mid-1969, Armstrong Contracting & Supply Corporation published safety instructions to be followed in all applications. The instructions were not placed on the container but were presented in the Armstrong Contracting & Supply Corporation construction manual. It is AWI's understanding that the specially trained insulation mechanics applying Armaspray were instructed according to the provisions of the construction manual. Armaspray was sold by AWI exclusively to Armstrong Contracting & Supply Corporation. For applications of Armaspray with A-200 spray equipment, the safety instruction read:

"Always wear a U.S. approved respirator when spraying. If tamping in the vicinity of the actual spray operator, the tamper should also wear a respirator."

For application of Armaspray with the Armaspray junior spray machine, the safety instruction read:

"Always wear an MSA approved respirator when spraying. If tamping in the vicinity of the actual spray operator, the tamper should also wear a respirator."

Armaspray was sold by AWI exclusively to Armstrong Contracting & Supply Corporation (now ACandS, Inc.) from 1966 to 1969. Armaspray was packaged in bags containing the Armstrong Contracting & Supply Corporation label. Documents which may expand upon these responses are available for inspection. An index is available.

Q12. Is it possible to distinguish the asbestos products listed by you in Answers 9 and 10 from those manufactured or distributed by a competitor?

- a. If so, please describe how you contend your product can be distinguished and identify each of your products by trade and generic name.
- b. If there are products which, in your opinion, cannot be distinguished from products of a similar kind manufactured by a competitor, please state the name of each such similar product, who manufactured it, as well as the trade name of the product manufactured by your competitor.

ANSWER: LT Cork Covering can be distinguished by its unique physical structure, while Armaspray was primarily a mineral wool product with about an 8% asbestos content. With regard to the balance of products identified in Attachment A which were sold but not manufactured by AWI, we have neither records nor actual knowledge by which to answer this interrogatory.

Q13. For each asbestos product listed by you in Answer 9 and 10, state whether the product could be used interchangeably with products of other manufacturers, distributors, or sellers, and if so, please identify such product and manufacturer.

ANSWER: Objection. This interrogatory contains an implicit assumption of matters not otherwise established, which renders the interrogatory argumentative, incapable of fair and correct answer, and without foundation. Without waiving same, the substitution for particular products would depend upon the particular specifications and requirements of each application which information AWI does not presently have.

Q14. For each asbestos product listed by you in Answer 9 and 10, state the names and addresses of each Maryland and California customer who purchased the product and each Maryland and California job site to which the products were delivered by year, and complete a Worksite/Purchase Sales Information Sheet (Attachment II) for each purchaser or worksite (Attachment IV).

ANSWER: Objection. This interrogatory is overly broad, vague and ambiguous. This interrogatory contains an implicit assumption of matters not otherwise established, which renders the interrogatory argumentative, incapable of fair and correct answer, and without foundation. Without waiving same, under AWI's record retention schedule, sales records (invoices, bills of lading, etc.) for asbestos-containing insulation products no longer exist. All contract documents went with ACandS upon its formation in late 1957.

LT Cork Covering, which contained only a small percent of asbestos in the outside paper wrapper and was used as low temperature insulation, was sold from 1956-1959.

Armaspray was sold only to ACandS 1966-1969.

Documents which may expand upon these responses are available for inspection. An index is available.

Q15. For each asbestos product you manufactured or sold, state the total dollar, linear feet and/or number of pounds of the product:

- a. Sold in Maryland State;
- b. Sold in the United States.

ANSWER: See response to interrogatory 22, which is adopted and incorporated herein.

Q27. Did you at any time recommend that your own employees use respirators, protective masks, or other precautionary safeguards when working with asbestos-containing materials? If so, state:

- a. When and precisely to whom such recommendations were made;
- b. whether you ever supplied respirators, face masks to your employees, and if so, the date when first supplied and whether you are supplying them now;
- c. From what specific source you have obtained such respirators and face masks (state address of company and dates obtained).

ANSWER: See response to interrogatory 22, which is adopted and incorporated herein.

Q28. Have you stopped producing, distributing and/or selling or has asbestos been eliminated from any of the asbestos products listed in Answer 9 or 10? If so, state for each product:

- a. The reason and date you stopped producing the product, or eliminated asbestos;
- b. The names and titles of each person who recommended and who authorized or directed the action;
- c. Whether any studies were conducted before you directed that production and sale of the product be stopped, or asbestos eliminated from the product, and if so, identify each study by date, author, title and subject matter and attach a copy.

ANSWER: (a). The manufacture of LT Cork Covering was discontinued in 1959 for the reason that it was no longer a competitive product. Armaspray was developed as a test product which was found to be commercially unacceptable; therefore, it was discontinued in mid-1969. With regard to those asbestos insulation products which AWI installed/sold but did not manufacture, these were discontinued when AWI got out of the contract

installation business on 12/31/57. Documents which may expand upon these responses are available for inspection. An index is available.

(b) LT Cork Covering: Unknown

Armaspray: W. B. King

(c). Objection. This interrogatory is overly broad, vague and ambiguous. This interrogatory contains an implicit assumption of matters not otherwise established, which renders the interrogatory argumentative, incapable of fair and correct answer, and without foundation.

Q29. Have any officers or employees of defendant ever discussed or evaluated whether sales of your asbestos products would be damaged if the public learned of the health hazards associated with asbestos exposure? If so, state the dates and names of participants of each such meeting and identify all documents relating to such meetings.

ANSWER: See response to interrogatory 22, which is adopted and incorporated herein.

Q30. At the time of the development of, and sale of each of your asbestos product did you attempt to determine whether the product complied with any allegedly applicable safety standards, orders, rules, regulations or design requirements promulgated by any professional society, association, or government body?

- a. If you did not, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis;
- b. If you did, identify the safety standards, safety orders, rules, regulations, which you claim you considered by naming the title, number, page and date of the regulation, and identifying the place where a copy of said regulation can be obtained.

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF LANCASTER

I, the undersigned, D. D. Wilson, being first duly sworn according to law, depose and say that I am an Assistant Secretary of Armstrong World Industries, Inc. The information contained in the responses hereto was gathered pursuant to my overall guidance by employees of this Company. I have no personal knowledge of same but am informed and therefore believe the answers to be true and correct. The responses have been prepared by counsel. I am executing this affidavit solely for the purpose of affixing the Company's signature hereto.

DATED: May 1, 1996

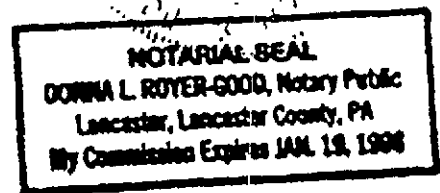
ARMSTRONG WORLD INDUSTRIES, INC.

A Pennsylvania Corporation

BY: 
Assistant Secretary

On this 1st day of May, 1996, before me personally appeared D. D. Wilson, to me known to be the person described herein, and who executed the foregoing instrument and who acknowledged that he voluntarily executed the same.

Donna L. Royer-Good
Notary Public



ARMSTRONG'S CONTRACT DEPARTMENT

Armstrong historically was a low temperature insulation manufacturer and contractor, supplying cork insulation products which were installed by its employees in dairies, ice houses, etc. Except for a limited product line manufactured from approximately 1910-1933, Armstrong's main involvement with high-temperature asbestos-containing insulation products began at the beginning of World War II, when its Contract Department first obtained the right to install products manufactured by Keasbey & Mattison. Armstrong remained an insulation contractor until the end of 1957, when the contracting business was taken over by ACandS. Documents which may expand upon these responses are available for inspection.

PRODUCTS MANUFACTURED BY OTHER COMPANIES AND
INSTALLED BY ARMSTRONG CONTRACT EMPLOYEES

Keasbey & Mattison (1939-1957)

The following products were sold by Keasbey & Mattison Company for installation by Armstrong's Contract Department at various times and locations; not every product was available at all times and at every location.

- 85% Magnesia Pipe Covering & Block and Cement were used to insulate pipes and surfaces with temperatures up to 600°F.
- Hy-Temp Pipe Covering & Block and Cement were used to insulate heat lines and surfaces with temperatures ranging from 600°F to 1900°F.
- Kamatt Pipe Covering was used to insulate pipes with temperatures up to 750°F.
- Kaytherm Block was used to insulate surfaces with temperatures up to 1500°F.
- Mani-Ply Insulation were used to insulate pipes with temperatures up to 500°F.
- Bestfelt Pipe & Block & Sheet was used to insulate temperatures up to 700°F. The pipe covering was used on lines subject to vibrations.
- Air Cell Insulations were used on lines or surfaces with temperatures up to 300°F.
- Simplex Pipe Insulations were used to insulate lines with temperatures up to 300°F where a water-repellant surface was needed.
- Duplex Wool Felt Pipe Insulation was used to insulate hot or cold water lines 40°F to 210°F.
- K&M Asbestos Insulating Cements: No. 151 - smooth, hard surface; No. 152 - general utility cement; Velvet Hard Finish - hard gloss finish over blocks or cements; Mineral Wool - used in place of block insulation; Amblerex No. 2 - up to 1000°F.
- K. P. Asbestos Floats were used to give a dense, tough, hard quality to the final asphalt plastic finish on walls of low temperature rooms (EX 25 asbestos in earlier years).

Unarco (1954-1956):

- Armabestos Pipe Covering & Block was used to insulate pipes with temperatures up to 750°F or 1200°F, or surfaces up to 1200°F.

Ehret Magnesia (1957):

- 85% Magnesia Pipe Covering and Block (and Calcium Silicate Pipecovering for use as an inner layer with 85% magnesia) was used to insulate pipes and surfaces with temperatures ranging from 600°F (85% Magnesia alone) to 1200°F (both layers).

Baldwin-Hill (1951-1956):

Baldwin-Hill #1 Insulating Cement was used for plastic insulation on irregular surfaces up to 1800°F.

Owens-Illinois (1955-1957):

Kaylo Pipe Covering & Block was used to insulate pipes and surfaces with temperatures up to 1200°F; Kaylo-20, up to 1800°F.

Eagle-Picher (1954-1957):

Armtemp 166 Cement was used as an all-purpose insulating material on surfaces up to 1800°F. At the time AWI relabeled Armtemp 166 (1954-1957), AWI was unaware that it contained asbestos. Through the course of litigation, Eagle-Picher has provided information that suggests Armtemp 166 contained asbestos.

PRODUCTS MANUFACTURED BY ARMSTRONG

LT Cork Covering (1956-1959) was a pipe insulation, -120°F to 200°F.

Armaspray (1966-1968) was used by AC&S to insulate large irregular surfaces, up to 1600°F.