

AFFIDAVIT OF PHILLIP S. BETTOLI

ON BEHALF OF GAF CORPORATION

STATE OF VIRGINIA)
) ss.:
COUNTY OF FLUVANNA)

I, PHILLIP S. BETTOLI, after first having been duly sworn, deposes and states as follows:

1. From 1945 until my retirement in 1981, I was employed continuously by GAF Corporation ("GAF") or its predecessor, The Ruberoid Co. ("Ruberoid"). In 1945, I joined Ruberoid as a Research Chemist and I remained in that position until 1949 when I became Chief Research Chemist in the Research and Development Department. In 1952, I assumed the position of Assistant Director of Research and, in 1957, I became Director of Research. When Ruberoid was acquired by GAF on May 26, 1967, my title changed to Technical Director of the Building, Industrial and Floor Products Divisions. The nature of my work required me to be knowledgeable about the company's products, including their composition and the processes by which they were manufactured. As a result, I have testified frequently in cases involving asbestos-containing products manufactured by Ruberoid and GAF.

2. Ruberoid's St. Louis, Missouri plant, which began operations in September of 1927 and was acquired from Eternit, Inc. in the early 1930's, was one of several Ruberoid plants that manufactured asbestos-containing cement-based products. (Some of the other Ruberoid plants manufactured other types of asbestos-containing products.) Asbestos-containing cement-

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products include shingles and sidings. The cement is cured, resulting in stone-like products that are durable, fireproof and weather-resistant, suitable for exterior uses. The asbestos-containing cement-based products made at the St. Louis plant in the 1930's contained asbestos and ground limestone, but the primary ingredient was Portland cement (up to 85%). See generally, the attached copy of a 1927 article about Eternit's asbestos-containing cement-based products and their composition. (Exhibit A.)

3. Portland cement, the main ingredient used in the manufacture of asbestos-containing cement-based products, is a fine powder, made predominantly from limestone and siliceous minerals with minor amounts of alumina, iron and gypsum. The attached copy of a portion of the chapter on Cement and Cement Raw Materials from Stanley J. LeFond's 1983 Industrial Minerals and Rocks (5th edition) describes the ingredients and method of producing Portland cement, which has been manufactured in the United States for more than 100 years. (Exhibit B.) The authors of the chapter note that Portland cement manufacture has always been a dusty business:

Cement processing requires the creation and handling of fine mineral materials. Problems arise through the escape of these materials as dust. Dust collection, for many years, has required elaborate and costly equipment.

Exhibit B, p. 141.

4. Calsilite® pipe covering and block insulation and insulating cements produced by GAF did not contain any Portland cement.

Phillip S. Bettoli

PHILLIP S. BETTOLI

Signed and sworn to before me
this 18th day of November, 1993

Janet B. Radella
Notary Public

Exp. Date: Jan. 31, 1996