

FILE NAME: Johns-Manville (JMA)

DATE: 1979

DOC#: JMA324

DOCUMENT DESCRIPTION: Legal - Answers to Plaintiff's
Interrogatories - Railroad Friction Products Tests

12-12-27
Johns-Manville
Friction
Products
Corp.

VICTOR DERRICK

COURT OF COMMON PLEAS
DIVISION

VS.

GRIFFIN WHEEL ET AL

OCTOBER TERM, 1979

No. 1298

ANSWERS OF DEFENDANTS JOHNS-MANVILLE CORPORATION AND
JOHNS-MANVILLE SALES CORPORATION TO
PLAINTIFF'S INTERROGATORIES

1. Describe in detail the corporate relations between
Johns-Manville and Railroad Friction Products. (RFPC).

ANSWER: Johns-Manville Corporation owns 50% of the shares of
stock of Railroad Friction Products Corporation.

2. Does or did Johns-Manville own a percentage of the stock
of RFPC?

ANSWER: See Answer to Interrogatory No. 1.

3. What is that percentage?

ANSWER: See Answer to Interrogatory No. 1.

4. Does Johns-Manville control RFPC?

ANSWER: No.

5. Does RFPC manufacture railroad engine brake shoes for
Johns-Manville? If no, did it do so and during what years?

ANSWER: No.

11. If the answer to #10 is yes, what percentage of the dust is asbestos? How many particles of asbestos dust per million particles dust and/or air are emitted?

ANSWER: Not applicable.

12. Do these railroad engine brake shoes deteriorate?

ANSWER: Not applicable.

13. When they deteriorate, do they become cracked and broken?

ANSWER: Not applicable.

14. Is dust containing asbestos emitted? How many particles of asbestos dust per million are emitted?

ANSWER: Not applicable.

15. Have you ever tested the asbestos dust emissions of your railroad engine brake shoes?

ANSWER: Not applicable.

16. Have you ever tested the asbestos dust emissions of railroad brake shoes manufactured by Railroad Friction Products?

ANSWER: Yes.

17. If the answer to #15 or #16 is yes please set forth:

a. time, place, and date of tests.

ANSWER: July 26-30, 1971; Wilmerding, Pennsylvania.

b. nature of tests

ANSWER: A series of tests were run on a dynamometer simulating a wide range of braking conditions. Wear dust from the various phases was collected the subsequently analyzed for asbestos fiber content.

c. conclusions of the tests

ANSWER: Results of these tests showed that less than 1% of the fiber originally in the brake shoes appears as undegraded fiber in the wear dust under most conditions, and that less than 1/10 of that amount becomes airborne.

d. where results were published or filed

ANSWER: To Defendants' knowledge the results were not published.

e. how Plaintiff may obtain those results

ANSWER: Defendants object to this subpart on the grounds that this is an inappropriate question.

Dated this ____ day of June, 1982.

MARSHALL, DENNEHEY, WARNER,
COLEMAN and GOGGIN

By: _____

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