NO. 89-11575-I

MYRTLE MAE REDMOND, ET AL	)	IN THE DISTRICT COURT OF
Plaintiff,	)	
v.	)	DALLAS COUNTY, TEXAS
FIBREBOARD CORPORATION, et al.,	)	
Defendant.	)	162ND JUDICIAL DISTRICT

W.R. GRACE & CO. - CONN'S SUPPLEMENTAL ANSWERS TO PLAINTIFFS' INTERROGATORIES

INTRODUCTORY STATEMENT

The following answers are based upon facts known or believed by W. R. Grace & Co. - Conn., formerly known as W. R. Grace & Co., ("Grace-Conn") at the time of answering these interrogatories. Much of the information is sought from many years ago and is, therefore, difficult or impossible to reconstruct or retrieve. Grace-Conn, therefore, reserves the right to amend these answers as and if new or better information becomes available to it or if errors are discovered.

Unless otherwise stated in an answer to a specific interrogatory, these answers are limited to the activities of Grace-Conn's Construction Products Division ("CPD") within the United States during the relevant time period. These answers are further limited to products manufactured and/or sold by Grace-Conn and/or the Zonolite Company, the assets of which were acquired by Grace-Conn in 1963, from 1940 through 1970 which were used in the commercial construction industry that had fireproofing, thermal or acoustical insulating properties and contained commercial asbestos, and to products manufactured and/or sold by Grace-Conn and/or the Zonolite Company from 1940 through 1970 which were used in the commercial construction industry that had fireproofing, thermal or acoustical insulating properties, and which do not contain commercial asbestos but contain vermiculite. Products which contain vermiculite may contain trace amounts of asbestiform tremolite as a contaminant.

Any reference to the manufacture, sale or distribution of a product by any entity other than Grace-Conn, e.g., by the Zonolite Company, should not be considered an admission that Grace-Conn is liable or responsible for injuries alleged to have resulted from the manufacture, sale, or use of such product.

PLAINTIFF'S EXHIBIT WRG 132

INTERROGATORIES

INTERROGATORY 1

State Defendants (sic) proper legal name, the present address of Defendant's principal place of business, all states in which Defendant is incorporated, and all states in which Defendant is licensed to do business.

ANSWER 1

W. R. Grace & Co. - Conn.; Grace Plaza, 1114 Avenue of the Americas, New York, New York 10036; Connecticut; Grace-Conn is qualified to do business in every state.

INTERROGATORY 2

Please identify by trade or brand name each asbestos-containing product manufactured and/or sold by Defendant and/or Defendant's predecessors from 1940 through 1970. For each product identified, please state following:

a. A description of the physical appearance of the product;

b. The address, including city and state, of the plants at which the product was manufactured and/or packaged;

c. The states in which the product entered the stream of commerce;

d. Where the greatest percentage of total production of each product indicated in response to Interrogatory No. 2 took place. Please indicate of (sic) percentage of production and its production location for each product by decade for the 1940's, 1950's, and 1960's.

ANSWER 2

See Product Appendix Nos. 1-28(a).

a. See Product Appendix Nos. 1-28(b).

b. See Product Appendix Nos. 1-28(c).

c. See the answer to sub-part(b), above.

d. Grace-Conn states that in order to answer this Interrogatory sub-part, it caused a reasonable review of its existing records but was unable to locate documents allowing it to determine where the greatest percentage of production took place for the products identified in the Product Appendix (hereinafter referred to as "the Products") during the 1940's, 1950's and 1960's..

INTERROGATORY 3

For each product identified in answer to Interrogatory No. 2, please identify the location at which each decision was made concerning the following subjects for the 1940's, 1950's and 1960's:

a. Testing of the product for quality and safety;

b. Advertising of the product;

c. Marketing of the product;

d. Placement of warning labels on the product;

e. Design of the product;

f. Manufacture of the product.

ANSWER 3

a. Grace-Conn interprets the term "decision" to mean the exercise of final authority to establish policy regarding a given aspect of its business by the employee properly designated to do so. Subject to this interpretation, Grace-Conn states that in the 1940's, the 1950's, and the early 1960's, decisions concerning the testing of products 1 through 8 and 19 through 28 of the Product Appendix for quality and safety were made at Zonolite headquarters in Chicago, Illinois. Decisions concerning the testing of products 9 through 18 of the Product Appendix for quality and safety during this time period were made at Western Mineral Products Company headquarters in Minneapolis, Minnesota. Upon the acquisition by Grace-Conn of the Zonolite Company in 1963, the Zonolite Company became the Zonolite Division of Grace-Conn and such decisions for products 1 through 8 and 19 through 28 of the Product Appendix continued to be made at Zonolite headquarters in Chicago. Upon the acquisition by Grace-Conn of the Western Mineral Products Corporation in 1966, such decisions for products 9 through 18 of the Product Appendix were made at Zonolite headquarters in Chicago. With the establishment by Grace-Conn of its Construction Products Division ("CPD") in 1969, all such decisions for all the products listed in the Product Appendix were made at CPD headquarters in Cambridge, Massachusetts.

b. Subject to the interpretation in sub-part (a), Grace-Conn states that in the 1940's, the 1950's, and the early 1960's, decisions concerning the advertising of products 1 through 8 and 19 through 28 of the Product Appendix were made at Zonolite headquarters in Chicago,

Illinois. Decisions concerning the advertising of products 9 through 18 of the Product Appendix during this time period were made at Western Mineral Products Company headquarters in Minneapolis, Minnesota. As in subpart (a), decisions concerning the advertising of products 1 through 8 and 19 through 28 were transferred to CPD in Cambridge, Massachusetts in the late 1960's. In a fashion similar to subpart (a), decisions concerning the advertising of products 9 through 18 of the Product Appendix were transferred to the Zonolite Division headquarters in Chicago in 1966, and then to CPD headquarters in Cambridge in the late 1960's.

c. Grace-Conn states that decisions concerning the marketing of the Products were made a fashion similar to the decisions concerning advertising described in subpart (b).

d. Grace-Conn states that decisions, if any, concerning the placement of warning labels on the products were made in a fashion similar to the decisions concerning testing in subpart (a).

e. Subject to the interpretation in sub-part (a), Grace-Conn states that in the 1940's, the 1950's, and the early 1960's decisions concerning the design of products 1, 3 through 7, 19, and 22 through 28 of the Product Appendix were made at Zonolite headquarters in Chicago, Illinois and may have been made at the Travelers Rest facilities in Travelers Rest, South Carolina. Such decisions were transferred to CPD headquarters in the late 1960's. Further, Grace-Conn states that in 1958, Robert C. Sefton of Steel City Industries entered into an agreement with Zonolite selling Zonolite the rights to products 2, 8, 20, and 21 of the Product Appendix. Thus, decisions concerning the design of these products may also have been made at the headquarters of Steel City Industries in Bridgeville, Pennsylvania. Grace-Conn further states that decisions concerning the design of products 9 through 18 of the Product Appendix were made at Western Mineral Products Company headquarters in Minneapolis, Minnesota. Such decisions were transferred to Zonolite Division headquarters in 1966 after Grace-Conn acquired Western Mineral Products Company, and were again transferred to CPD headquarters in the late 1960's. Grace-Conn further states that Western Mineral Products Company purchased rights to product 18 of the Product Appendix from Highland Stucco and Lime of Van Nuys, California and decisions concerning the design of this product thus may have taken place there.

f. Grace-Conn states that decisions concerning the manufacture of the products were made in fashion similar to decisions concerning testing in sub-part (a).

INTERROGATORY 4

For each product identified in answer to Interrogatory No. 2, please identify the location at which each of the following activities was conducted for the 1940's, 1950's and 1960's:

a. Testing of the product for quality and safety;

b. Advertising of the product;

c. Marketing of the product;

d. Placement of warning labels on the product;

e. Design of the product;

f. Manufacture of the product.

ANSWER 4

a. Grace-Conn states see the locations set forth in the answer to Interrogatory 3(a) above. Further, Grace-Conn states see all the plants listed in the Product Appendix.

b. Grace-Conn states that, in the 1940's, 1950's, and 1960's, activities regarding the advertising of products 1 through 8 and 19 through 28 of the Product Appendix were conducted and implemented on a national level. Further, Grace-Conn states that activities regarding the advertising of products 9 through 18 of the Product Appendix were conducted at the Western Mineral Products Company headquarters in Minneapolis, Minnesota. Thus, Grace-Conn states see the locations set forth in the answers to Interrogatory 3(b) above. Grace-Conn further states that the implementation of such advertising as well as independent advertising on a local level may have been conducted at regional and district sales offices nationwide.

c. Grace-Conn states that activities regarding the marketing of the products were conducted in a fashion similar to the activities concerning the advertising of the products in subpart (b). Grace-Conn further states that activities regarding the marketing of the products took place in regional and district sales offices and by salespeople and sales representatives nationwide.

d. Grace-Conn states that no activities regarding the placement of warning labels on the products were conducted during the 1940's, the 1950's, and the 1960's because no decision was made to place warnings upon the

packaging of its commercial asbestos or vermiculite-containing-products or directly upon any of those products during that period.

e. Grace-Conn states see the locations set forth in the answer to Interrogatory 3(e) above.

f. Grace-Conn states that the activities regarding the manufacturing of the products were conducted in the plants listed in the Product Appendix.

Respectfully submitted,

W.R. GRACE & CO.-CONN
By its Attorney,

Elizabeth Phifer, Esq.
Fisk and Fielder
Attorneys at Law
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing instrument was served via hand delivery to Russell W. Budd, Baron & Budd, A Professional Corporation, 8333 Douglas Avenue, 10th Floor, Dallas, Texas 75225, and to all other known counsel of record via first class mail, this 29th day of May, 1990.

ELIZABETH L. PHIFER

PRODUCT APPENDIX

COMMERCIAL ASBESTOS-CONTAINING PRODUCTS

1. a. Econo-White 65 and Econo-White 70.

   b. White acoustical plaster.

   c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

      (1) North Little Rock, Arkansas; 1956-1968.
      (2) Sacramento, California.
      (3) Dearborn, Michigan.
      (4) Omaha, Nebraska.
      (5) Trenton, New Jersey.
      (6) Albany, New York.
      (7) Ellwood City, Pennsylvania; made for a two-year period, late 1950's or early 1960's.
      (8) Travelers Rest, South Carolina.
      (9) Kearney, South Carolina.
      (10) Dallas, Texas.

2. a. Zono-Coustic 2 and Zono-Coustic Z.

   b. Off-white acoustical plaster.

   c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

      (1) North Little Rock, Arkansas; 1961-1962.
      (2) Los Angeles, California.
      (3) Newark, California; 1970-1973.
      (4) Sacramento, California.
      (5) Wilder, Kentucky.
      (6) Dearborn, Michigan.
      (7) St. Louis, Missouri.
      (8) Omaha, Nebraska.
      (9) Trenton, New Jersey.
      (10) Albany, New York.
      (11) Portland, Oregon; 1960's.
      (12) Ellwood City, Pennsylvania.
      (13) Travelers Rest, South Carolina, 1959-1963.
      (14) Kearney, South Carolina.
      (15) Dallas, Texas.
      (16) Spokane, Washington; 1959-1962.

3. a. Zonolite Acoustical Plastic/Plaster.

b. Light beige acoustical plastic.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Birmingham, Alabama.
(2) Phoenix or Glendale, Arizona; 1959-early 1970's.
(3) North Little Rock, Arkansas; 1951-mid 1960's.
(4) Los Angeles, California; 1951-early 1970's.
(5) Sacramento, California.
(6) Denver, Colorado; 1952-1959.
(7) Tampa, Florida; 1950's-1967.
(8) Easthampton, Massachusetts.
(9) North Billerica, Massachusetts.
(10) Dearborn, Michigan.
(11) Minneapolis, Minnesota; 1949-1962.
(12) St. Louis, Missouri.
(13) Omaha, Nebraska; 1962-1970.
(14) Trenton, New Jersey; 1964.
(15) Albany, New York.
(16) Portland, Oregon.
(17) Ellwood City, Pennsylvania; 1948-1960.
(18) Travelers Rest, South Carolina; 1948-1963.
(19) Kearney, South Carolina.
(20) Dallas, Texas; 1973.
(21) Spokane, Washington; 1945-early 1970's.
(22) Milwaukee, Wisconsin; made until 1971, beginning date unknown.

4. a. Zonolite Finish Coat (Decorator's White).

b. White textured finish.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Los Angeles, California.
(2) Sacramento, California.
(3) Denver, Colorado; 1952-1965.
(4) Pompano Beach, Florida; 1971-1974.
(5) Wilder, Kentucky.
(6) Easthampton, Massachusetts.
(7) Dearborn, Michigan.
(8) Trenton, New Jersey.
(9) Albany, New York.
(10) Portland, Oregon.
(11) Travelers Rest, South Carolina; 1950's.
(12) Dallas, Texas; 1973.
(13) Spokane, Washington.

5. a. Zonolite Finish Coat (Decorator's White)(Extra Hard).

   b. Decorative textured finish.

   c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

      (1) Los Angeles, California.
      (2) Sacramento, California.
      (3) Denver, Colorado.
      (4) Pompano Beach, Florida; 1971-1974.
      (5) Wilder, Kentucky.
      (6) Easthampton, Massachusetts.
      (7) Dearborn, Michigan.
      (8) Trenton, New Jersey.
      (9) Albany, New York.
      (10) Portland, Oregon.
      (11) Travelers Rest, South Carolina.
      (12) Dallas, Texas.
      (13) Spokane, Washington.

6. a. Zonolite Spra-Tex (Regular).

   b. White decorative ceiling finish.

   c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

      (1) North Little Rock, Arkansas; may have been made after 1961.
      (2) Los Angeles, California.
      (3) Sacramento, California.
      (4) Pompano Beach, Florida.
      (5) Wilder, Kentucky.
      (6) New Orleans, Louisiana.
      (7) Omaha, Nebraska.
      (8) Trenton, New Jersey.
      (9) Albany, New York.
      (10) Ellwood City, Pennsylvania; 1957-1963.
      (11) Travelers Rest, South Carolina.
      (12) Kearney, South Carolina.
      (13) Spokane, Washington.

7. a. Zonolite Spra-Tex (Extra-Hard).

   b. White textured ceiling finish.

   c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) North Little Rock, Arkansas.
(2) Los Angeles, California.
(3) Sacramento, California.
(4) Pompano Beach, Florida.
(5) Wilder, Kentucky.
(6) New Orleans, Louisiana.
(7) Omaha, Nebraska.
(8) Trenton, New Jersey.
(9) Albany, New York.
(10) Ellwood City, Pennsylvania; 1961-1963.
(11) Travelers Rest, South Carolina; 1961-1963.
(12) Kearney, South Carolina.
(13) Spokane, Washington.

8. a. Z-Tex, may also be marketed as EZ-Tex, Z-Tex 2 and Z-Tex 2 Super White.

b. White or beige sprayed texture product.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) North Little Rock, Arkansas.
(2) Sacramento, California.
(3) Pompano Beach, Florida.
(4) Wilder, Kentucky.
(5) St. Louis, Missouri.
(6) Trenton, New Jersey.
(7) Albany, New York.
(8) Travelers Rest, South Carolina.

9. a. Perltex Super-40 Fog. The product may have been sold under the following name at various times: Perltex Fog. Grace-Conn believes that the product may have been produced and sold under the alternative name prior to 1968.

b. White or beige base coat.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Pompano Beach, Florida; after 1971.
(2) Omaha, Nebraska; before 1972.

10. a. Perltex Super-40 Perlite.

b. White or beige textured finish product.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Pompano Beach, Florida; 1972-1973.
(2) Omaha, Nebraska; mid-sixties.
(3) Dallas, Texas.

11. a. Perltex Super-40 Polycoarse. The product may have been sold under the following alternative trade name: Perltex Polycoarse. Grace-Conn believes that the product may have been produced and sold under the alternative name prior to 1968.

b. White or beige textured product.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Pompano Beach, Florida; 1972-1973
(2) Omaha, Nebraska; mid-sixties-1972.

12. a. Perltex Super-40 SAV.

b. White or beige textured finish.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Pompano Beach, Florida; 1971-1973.
(2) Omaha, Nebraska, mid-sixties-1972.

13. a. Perltex Spray Surfacer. This product may have been sold under the following alternative trade names: Plastertex, Perltex Super-40 Spray Surfacer or Perltex Super 40.

b. Product was a texture product, applied over board, concrete, metal or plaster, white in color.

c. The product was manufactured at one or both of the plants listed below. Approximate dates of manufacture are also listed.

(1) Pompano Beach, Florida; 1971-1973.
(2) Omaha, Nebraska; before 1972.

14. a. PERL-COUSTIC

b. Acoustical Plaster.

c. The product was manufactured at one or both of the plants listed below.

(1) Omaha, Nebraska.
(1) Milwaukee, Wisconsin.

15. a. PREP COAT #3

b. Believed to be a decorative exterior finish.

c. (1) Omaha, Nebraska.

16. a. Versakote or Prep Coat #4.

b. White or beige textured finish.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Pompano Beach, Florida; 1972-1973.
(2) Omaha, Nebraska; 1972.

17. a. Spra-Wyt.

b. Acoustical plaster, color unknown. Investigation continues.

c. The product was manufactured at some or all of the plants listed below. Approximate dates of production are not known. Investigation continues.

(1) Denver, Colorado.
(2) Minneapolis, Minnesota.
(3) Omaha, Nebraska.

18. a. Hi-Sorb Acoustical Plaster.

b. Textured ceiling plaster, oyster white; also available in color variations.

c. The product was manufactured at some or all of the plants listed below. Approximate dates of production are not known. Investigation continues.

(1) Denver, Colorado.
(2) Minneapolis, Minnesota.
(3) Omaha, Nebraska.

19. a. High Temperature Insulating Cement.

b. Light beige insulating cement.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Birmingham, Alabama.
(2) Phoenix or Glendale, Arizona; 1959-early 1970's.
(3) North Little Rock, Arkansas; 1951-mid 1960's.
(4) Los Angeles, California; 1951-early 1970's.
(5) Sacramento, California.
(6) Denver, Colorado.
(7) Tampa, Florida; 1950's-1967.
(8) Easthampton, Massachusetts.
(9) North Billerica, Massachusetts.
(10) Dearborn, Michigan.
(11) Minneapolis, Minnesota; 1949-1962.
(12) St. Louis, Missouri.
(13) Omaha, Nebraska; 1962-1970.
(14) Trenton, New Jersey; 1964.
(15) Albany, New York.
(16) Portland, Oregon.
(17) Ellwood City, Pennsylvania; 1948-1960.
(18) Travelers Rest, South Carolina; 1948-1963.
(19) Kearney, South Carolina; 1963-1964.
(20) Dallas, Texas.
(21) Spokane, Washington; 1945-early 1970's.
(22) Milwaukee, Wisconsin; made until 1971, beginning date unknown.

20. a. Zonolite Mono-Kote (MK-1).

b. Cementitious light beige fireproofing material.

c. The product was manufactured at some or all of the plants listed below. Approximate dates of production are not known.

(1) Phoenix, Arizona.
(2) Los Angeles, California.
(3) Sacramento, California.
(4) Denver, Colorado.
(5) Tampa, Florida.
(6) Wilder, Kentucky.
(7) New Orleans, Louisiana.
(8) Dearborn, Michigan.
(9) Minneapolis, Minnesota.
(10) Omaha, Nebraska.
(11) Trenton, New Jersey.
(12) Albany, New York.
(13) Portland, Oregon.
(14) Travelers Rest, South Carolina.
(15) Dallas, Texas.
(16) Spokane, Washington.

21. a. Zonolite Spra-Insulation (MK-2).

b. Dark beige cementitious material.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Sacramento, California.
(2) Denver, Colorado.
(3) Wilder, Kentucky.
(4) Minneapolis, Minnesota.
(5) Omaha, Nebraska.
(6) Trenton, New Jersey.
(7) Weedsport, New York.
(8) North Little Rock, Arkansas; a small amount may have been made at this plant some time after 1960.
(9) Portland, Oregon.
(10) Traveler's Rest, South Carolina; 1960.
(11) Dallas, Texas.
(12) Spokane, Washington; 1960-1962.
(13) Milwaukee, Wisconsin; discontinued about 1967.
(14) Los Angeles, California.

22. a. Zonolite Mono-Kote (MK-3).

b. Light beige cementitious material.

c. The product was manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Phoenix, Arizona (Glendale); 1960-1973.
(2) North Little Rock, Arkansas; 1959-1973.
(3) Los Angeles, California; 1959-1973.
(4) Newark, California; 1965-1973.
(5) Sacramento, California.
(6) Santa Ana, California; 1972-1973.
(7) Denver, Colorado; 1959-1973.
(8) Jacksonville, Florida; 1968-1973.
(9) Tampa, Florida; 1960-1967.
(10) Chicago, Illinois (W. Chicago); 1959-1973.
(11) Wilder, Kentucky.
(12) New Orleans, Louisiana; some MK-3 was made at this plant for a short period in the early 1960's.
(13) Easthampton, Massachusetts; 1964-1973.
(14) Dearborn, Michigan.
(15) Minneapolis, Minnesota; 1960-1972.
(16) Kansas City, Missouri.
(17) St. Louis, Missouri; 1959-1973.
(18) Omaha, Nebraska; 1962-1973.
(19) Trenton, New Jersey; 1964.
(20) Albany, New York.

(21) Weedsport, New York; 1965-1973.
(22) Portland, Oregon; 1963-1973.
(23) Ellwood City, Pennsylvania; mid-1960's.
(24) New Castle, Pennsylvania; 1969-1973.
(25) Travelers Rest, South Carolina; 1959-1965.
(26) Kearney, South Carolina; 1966 or 1967-1973.
(27) Dallas, Texas.
(28) Spokane, Washington; 1959-1973.
(29) Milwaukee, Wisconsin.

PRODUCTS WHICH DO NOT CONTAIN COMMERCIAL ASBESTOS

23. a. Zonolite Mono-Kote (MK-4).

b. Beige fireproofing product.

c. The product was manufactured at the plants listed below. Where approximate dates of production are known, they are also listed.

(1) Los Angeles, California; 1977.
(2) Santa Ana, California; 1977 to present.
(3) Newark, California; 1972 to 1974.
(4) Phoenix, Arizona; present.
(5) Trenton, New Jersey; 1972.
(6) New Castle, Pennsylvania; 1972.

24. a. Plaster Aggregate.

b. Beige.

c. This product was manufactured at the plants listed below.

(1) Dallas, Texas.
(2) San Antonio, Texas.
(3) North Little Rock, Arkansas.
(4) New Orleans, Louisiana.
(5) Nashville, Tennessee.
(6) Trenton, New Jersey.
(7) Weedsport, New York.
(8) Easthampton, Massachusetts.
(9) Kansas City, Missouri.
(10) New Castle, Pennsylvania.
(11) Dearborn, Michigan.
(12) Newark, California.
(13) Portland, Oregon.
(14) Phoenix, Arizona.
(15) Santa Ana, California.
(16) Kearney, South Carolina.
(17) Jacksonville, Florida.
(18) Pompano Beach, Florida.
(19) Tampa, Florida.

(20) High Point, North Carolina.
(21) Irondale, Alabama.
(22) West Chicago, Illinois.
(23) Omaha, Nebraska.
(24) Minneapolis, Minnesota.
(25) Wilder, Kentucky.
(26) Denver, Colorado.
(27) St. Louis, Missouri.

25. a. Concrete Aggregate.

b. Tan expanded vermiculite.

c. This product was manufactured at the plants listed below.

(1) Dallas, Texas.
(2) San Antonio, Texas.
(3) North Little Rock, Arkansas.
(4) New Orleans, Louisiana.
(5) Nashville, Tennessee.
(6) Trenton, New Jersey.
(7) Weedsport, New York.
(8) Easthampton, Massachusetts.
(9) New Castle, Pennsylvania.
(10) Dearborn, Michigan.
(11) Newark, California.
(12) Portland, Oregon.
(13) Phoenix, Arizona.
(14) Santa Ana, California.
(15) Kearney, South Carolina.
(16) Jacksonville, Florida.
(17) Pompano Beach, Florida.
(18) Tampa, Florida.
(19) Kansas City, Missouri.
(20) High Point, North Carolina.
(21) Irondale, Alabama, 1980 to present.
(22) West Chicago, Illinois.
(23) Omaha, Nebraska.
(24) Minneapolis, Minnesota.
(25) Wilder, Kentucky.
(26) Denver, Colorado.
(27) St. Louis, Missouri.
(28) Los Angeles, California, 1975-6.
(29) Milwaukee, Wisconsin.
(30) Muirkirk, Maryland.
(31) Oklahoma City, Oklahoma.
(32) Traveler's Rest, South Carolina.

26. a. Stabilized Concrete Aggregate.

b. Dark gray expanded vermiculite.

c. This product was manufactured at the plants listed below from 1976 to the present. Investigation continues with regard to pre-1976 manufacture.

(1) Dallas, Texas.
(2) San Antonio, Texas.
(3) North Little Rock, Arkansas.
(4) New Orleans, Louisiana.
(5) Nashville, Tennessee.
(6) Trenton, New Jersey.
(7) Weedsport, New York, 1975 to present.
(8) Easthampton, Massachusetts.
(9) New Castle, Pennsylvania.
(10) Dearborn, Michigan.
(11) Newark, California.
(12) Portland, Oregon.
(13) Phoenix, Arizona.
(14) Santa Ana, California.
(15) Kearney, South Carolina.
(16) Jacksonville, Florida.
(17) Pompano Beach, Florida.
(18) Tampa, Florida.
(19) High Point, North Carolina.
(20) Irondale, Alabama, 1980 to present.
(21) West Chicago, Illinois.
(22) Omaha, Nebraska.
(23) Minneapolis, Minnesota.
(24) Wilder, Kentucky.
(25) Denver, Colorado.
(26) St. Louis, Missouri.
(27) Los Angeles, California, 1975.
(28) Milwaukee, Wisconsin.
(29) Muirkirk, Maryland.
(30) Oklahoma City, Oklahoma.
(31) Traveler's Rest, South Carolina.

27. a. Masonry Fill (also manufactured as Masonry Insulation).

b. Dark gray vermiculite fill.

c. The product has been manufactured at the plants listed below.

(1) Dallas, Texas.
(2) San Antonio, Texas.
(3) Oklahoma City, Oklahoma.
(4) Little Rock, Arkansas.
(5) New Orleans, Louisiana.
(6) Nashville, Tennessee.
(7) Trenton, New Jersey.
(8) Weedsport, New York.
(9) Easthampton, Massachusetts.
(10) Muirkirk, Maryland.

(11) New Castle, Pennsylvania.
(12) Dearborn, Michigan.
(13) Newark, New Jersey.
(14) Portland, Oregon.
(15) Phoenix, Arizona.
(16) Santa Ana, California.
(17) Kearney, South Carolina.
(18) Jacksonville, Florida.
(19) Pompano Beach, Florida.
(20) Tampa, Florida.
(21) High Point, North Carolina.
(22) Irondale, Alabama.
(23) Chicago, Illinois.
(24) Omaha, Nebraska.
(25) Minneapolis, Minnesota.
(26) Wilder, Kentucky.
(27) Denver, Colorado.
(28) St. Louis, Missouri.

28. a. Z-Crete.

b. Dark gray expanded vermiculite.

c. Grace-Conn is unable to answer this interrogatory on the basis of its current knowledge. Investigation continues.