

FILE NAME: General Refractories Company (GRC)

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GENERAL REFRACTORIES COMPANY
TRIAL PRESENTATION

ITEM

DESCRIPTION

CORPORATE HISTORY

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. II-1

Grefco admits it is incorporated, has its principal place of business in PA and regularly conducted business in Maryland until June, 1982.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 262 L.7 - L.9

General Refractories was incorporated in the early 1920's, although it existed before then.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 1

Grefco incorporated in Pennsylvania in 1922. It purchased Ohio Lime Company in 1967, American Refractories Company in 1971 and the Mining and Mineral Division of Great Lakes Carbon Corporation in 1966.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 160 L.4 - p.
170 L.9

Corporate history, who owns stock. Distinctions between Grefco and Grefco, Inc.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 176 L.7 - L.16

In 1948 General Refractories sold internationally and had sales offices throughout the United States.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 178
L.21 - p. 179 L.4

1520 Locust Street was the location of General Refractories corporate office in Philadelphia until about 1985.

Deposition of Roland Howard
King, dated 7/10/85, p. 40 L.15 -
p. 41 L.19

Past and present addresses of corporation headquarters.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 2

Name and principal place of business:

General Refractories Company
Bala Cynwyd, PA

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 4

GRC has acquired assets of company that mined, manufactured, marketed or distributed asbestos.

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Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 5

Companies involved with asbestos which GRC
purchased are:

Ohio Lime Company
Great Lakes Carbon Corporation
Bison Corporation

Deposition of Robert Lee
Everett, dated 2/10/94, p. 134
L.20 - p. 136 L.3

American Refractories is an installer owned by
General Refractories. General Refractories ships
them materials but they have no records prior to
1975. American Refractories is based in Reading,
PA. They have been a subsidiary since he has
been with the company.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 173 L.6 - p.
174 L.5

American Refractories is an installer.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 136
L.4 - p. 137 L.21

Furnco is a steel mill installation contractor which
was owned by General Refractories. Material
sometimes shipped to customer and sometimes to
Furnco. Almost always shipped to American
Refractories rather than customer.

In Re: Bethlehem Steel, USDC,
MD, dated 3/24/85, Interrogatory
No. 2

Grefco regularly conducted business in Maryland up
to June, 1982.

PRODUCTS

OC-GE-12
(PCC-GR-015)

Undated General Refractories Co. catalog entitled,
"U.S. Refractories Division General Catalog."

Shows refractory products with descriptions,
chemical analyses, technical data, physical
properties & applications.

OC-GE-24
(PCC-GR-055)

4/12/77 General Refractories Information Manual,
Volume II.

Manual discusses refractories and refractory
products as manufactured by General Refractories.

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OC-GE-31
(PCC-GR-009)

1949 General Refractories Catalog entitled,
"Refractories."

Brochure lists: the history of refractories; the history of the General Refractories Company; the research, manufacture and uses of refractories; Grefco products, properties and uses; brick tables and general information.

OC-GE-9
(PCC-GR-005)

Undated Brochure from General Refractories Co., U.S. Refractory Div. entitled, "GREFCO", outlining General Refractories product lines.

Thurman v. A.P. Green, St. Louis, MO, dated 7/17/87, Interrogatory No. 8

General Refractories has engaged in the manufacture and sale of products containing asbestos.

In Re: Asbestos Cases, Baltimore City, MD, dated 7/8/88, Requests for Admission No. 13

Grefco admits it sold asbestos-containing products 1961-1976.

In Re: Asbestos Cases, Baltimore City, MD, dated 5/13/92, Interrogatory No. 2

Listing of asbestos products, asbestos, usage, packaging, etc.

Litecast 30 and 30G	1961-1973
Steelklad 60 BIAE	1967-1978
Fibrous adhesive	1955-1981
Grefco Insulating Cement	1955-1974
Grefco Insul-Finish	1960-1971

Martin v. Grefco, Allegheny Cty., PA, dated 1/18/84, Interrogatory No. 5

Products listed:
Litecast 30 62-64
Steelklad 66-78
Fibrous Adhesive 63-73
MX17 Block Insulation 64-73
MX17 Insulating Cement 64-73

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Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 11

General Refractories asbestos products are:

Litecast 30	65-68	70-73
Steelklad Dibond 60 BIAE		67-78
Grefco Insulating Cement		61-73
Fibrous Adhesive		55-72
Purchased from JM		73-81

Also includes appearance of products.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 238 L.10 - p.
239 L.2

Litecast 30G was designed to be gunned and
contained asbestos.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 80
L.14 - L.20

Litecast 30 can be gunned.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 245 L.21 - p.
246 L.4

Litecast 30 contained 23% asbestos.

OC-GE-50
(PCC-GR-264)

9/30/65 Standard Mix Specification for Litecast 30.

Read heading, manufacturing guide column.

Specification lists Litecast 30 as containing 23%
Asbestos 7K15.

PCC-GR-281

Litecast 30 Standard Mix Specification Reissue
dated August 11, 1970.

Read heading, Mfg. Method, Manufacturing Guide.

"Dry Mixer"

"23% Asbestos 7K15"

Deposition of Robert Lee
Everett, dated 2/10/94, p. 15 L.9
- L.12, p. 16 L.1 - L.19

Responsible for production of all specialty products.
Fibrous Adhesive and Litecast 30 had asbestos in
them in 1963.

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OC-GE-5

(PCC-GR-001)

Undated Raw Material Specification Issued by
Materials Research Corp. - Research &
Development Dept. re: Asbestos Fibre 7K15.

Read entire specification.

Chemical analysis and description of Asbestos Fibre
7K15 is given, along with primary use listed as
fibrous adhesive.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 53

Description of packaging for:

Litecast 30 and 30G
Steelklad Dibond 60 BIAE
Grefco Insulating Cement
Grefco Insul-Finish Cement
Fibrous Adhesive

Deposition of Robert Lee
Everett, dated 2/10/94, p. 30
L.20 - p. 32 L.1

Use of asbestos in manufacture of Fibrous
Adhesive.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 49 L.15 - p. 51
L.9, p. 51 L.12

Resale of Fibrous Adhesive up till 1981. General
Refractories had previously sold. No warnings on
Fibrous Adhesive or Steelklad.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 83 L.13 - L.16

Fibrous Adhesive assembled by General
Refractories from 1955 at least until 1972.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 84 L.4 - L.7

1973 - 1981 Fibrous Adhesive was purchased from
Johns-Manville for resale.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 32
L.11 - p. 33 L.1

Use of asbestos in manufacture of Litecast 30.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 42 L.1
- p. 43 L.6

Production of Fibrous Adhesive and Litecast 30
during 1965-1968 was very similar to the way it was
done in St. Louis.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 14

Provides patent numbers and dates for:

Steelklad
Dibond
Litecast

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In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. II-7

Grefco admits it has manufactured a metal case
refractory brick that has an asbestos strip.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 44 L.21 - p. 45
L.1, p. 45 L.4 - p. 46 L.5, p. 46
L.7 - L.13

Asbestos inserts in Steelklad brick. Harbison-
Walker and North American Refractories produced
similar products.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 46 1 - p. 49
L.14

Describes thermal expansion. Substitute was found
for asbestos. Asbestos stopped being used around
1978.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 8

Asbestos in Steelklad was a "small spacer unit in a
very large block."

Deposition of Roland Howard
King, dated 7/10/85, p. 23 L.7 -
L.12

Nicolet was principal supplier of asbestos material
for brick.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 61

Nicolet and/or Eagle Picher supplied the asbestos
paper for Steelklad Dibond 60. Where other resale
products were purchased.

Deposition of Roland Howard
King, dated 7/10/85, p. 14 L.4 -
L.14

Dibond 70 could have had asbestos spacers. It was
also used in open hearth roofs.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 18a.

Describes how products are used:

Litecast 30
Steelklad Dibond 60 BIAE
Grefco Insulating Cement
Fibrous Adhesive

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 55

Grefco Insulating Cement and Grefco Insul-Finish
Cement were rebranded Eagle-Picher products and
Fibrous Adhesive was at times a rebranded Johns-
Manville products.

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Deposition of Joseph L. Stein,
dated 9/15/93, p. 80 L.11, p. 83
L.9

Grefco Insulating Cement was a rebranded Eagle-Picher product which contained asbestos. Can't rule out that some Eagle-Picher product was sold without being put in Grefco packaging. Grefco Insul-Finish was also a rebranded Eagle-Picher product with asbestos from 1960 through the early 1970's. Fibrous Adhesive was a product assembled by General Refractories.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 237 L.19 - p.
238 L.7

Grefco Insulating Cement was shipped dry then mixed with water prior to use.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 69
L.18 - p. 71 L.2

Grefco Insulating Cement was resold out of Sproul.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 71
L.20 - p. 72 L.18
Macon v. AC&S, Dauphin Cty.,
PA, Interrogatory No. 7

Recalls Grefco Insul-Finish Cement. He cannot say if these products were ever shipped to Maryland.

Products sold by Grefco. Grefco Insulating Cement 1955-1973 purchased from E-P, usage, packaging.

Macon v. AC&S, Dauphin Cty.,
PA, Interrogatory No. 12

Asbestos products sold under rebranding agreements.
Grefco Insulating Cement
Grefco Insul-Finish Cement
Fibrous Adhesive

Deposition of Joseph L. Stein,
dated 9/15/93, p. 89 L.16 - p. 90
L.5

MX-17 was only block insulation distributed by General Refractories.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 186 L.7 - p.
188 L.15

1972 brochure says General Refractories insulation block had long fibre asbestos in it.

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PCC-GR-092

Boiler Refractories Manual -- General Refractories Company. copyright 1939.

Read first page, page 19, section title (Expansion Joints), page 22, left column, sentence two, page 23, right column, last sentence.

"...easily compressible resilient material such as long fibre asbestos, asbestos rope..."

"All openings...should be neatly made and packed with long fibre asbestos..."

Deposition of Joseph L. Stein,
dated 9/15/93, p. 190 L.1 - p.
191 L.10

Product brochures do not indicate Litecast 30 and Fibrous Adhesive had asbestos in them during a period in which Stein admits these products did contain asbestos.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 27

Asbestos was eliminated from the following products:

Litecast 30 and 30G 1973
Steelklad Dibond 60 BIAE 1978

Deposition of Joseph L. Stein,
dated 9/15/93, p. 79 L.8 - p. 80
L.2

Litecast 30 with asbestos manufactured from early 1960's to approximately 1973. Steelklad Dibond 60 BIAE manufactured from 1967 to 1977.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 15

Dates when asbestos eliminated from certain products:

Litecast 30 and 30G 1973
Steelklad Dibond 60 BIAE 1978

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 12

Locations where asbestos-containing products were manufactured.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 105

Listing of Grefco facilities which manufactured asbestos products.

Deposition of Roland Howard
King, dated 7/10/85, p. 20 L.2 -
p. 22 L.1

Listing of facilities and product shipped direct from manufacturing plant.

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Deposition of Roland Howard King, dated 7/10/85, p. 47 L.13 - p. 49 L.2

Research and Development lab location and responsibilities.

Deposition of Joseph L. Stein, dated 9/15/93, p. 155 L.5 - p. 160 L.1

Lists facilities and mines owned in 1965.

Deposition of Robert Lee Everett, dated 2/10/94, p. 190 L.20 - p. 191 L.7

Sproul plant is about 200,000 square feet.

Thurman v. A.P. Green, St. Louis, MO, dated 7/17/87, Interrogatory No. 45

Listing of locations where General Refractories made its asbestos-containing products.

Abate v. ACandS, Baltimore City, dated 12/27/93, Interrogatory No. 203

Grefco had a manufacturing facility, warehouse and sales offices in Baltimore until 1979.

In Re: Asbestos Cases, Baltimore City, MD, dated 7/8/88, Requests for Admission No. 77

Grefco admits its employees mixed, cut and tested its asbestos-containing products during their manufacture.

In Re: Asbestos Cases, Baltimore City, MD, dated 7/8/88, Requests for Admission No. 82

Grefco admits it never conducted dust measurements in its own facilities.

Thurman v. A.P. Green, St. Louis, MO, dated 7/17/87, Interrogatory No. 74

General Refractories division or subsidiaries did engage in the contracting business of applying insulation products. American Refractories Company.

Thurman v. A.P. Green, St. Louis, MO, dated 7/17/87, Interrogatory No. 48

General Refractories never prepared any written material on how its asbestos-containing materials should be used or maintained.

In Re: Asbestos Cases, Baltimore City, MD, dated 5/13/92, Interrogatory No. 28

Grefco never recommended to purchasers or users of its asbestos-containing products that they use respirators or wear protective clothing.

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Martin v. Grefco, Allegheny Cty., PA, dated 1/18/84, Interrogatory No. 13

Grefco did not test to see if inhalation of asbestos fibers is harmful, but Refractories Institute or the McIntyre Foundation might have

In Re: Asbestos Cases, Baltimore City, MD, dated 5/13/92, Interrogatory No. 43

Grefco has never conducted any studies to determine what type of ventilation will reduce airborne asbestos fibers in confined spaces.

Abate v. ACandS, Baltimore City, dated 12/27/93, Interrogatory No. 151

Grefco never conducted any studies to determine what type of ventilation would reduce airborne asbestos fibers in confined spaces.

Thurman v. A.P. Green, St. Louis, MO, dated 7/17/87, Interrogatory No. 33

General Refractories never published any warnings concerning the possibility of injury from its asbestos-containing products.

Deposition of Robert Lee Everett, dated 2/10/94, p. 181 L.15 - L.20

No warning on Fibrous Adhesive.

Deposition of Robert Lee Everett, dated 2/10/94, p. 184 L.10 - L.12

MX-17 did not have a warning.

Deposition of Joseph L. Stein, dated 9/15/93, p. 91 L.9 - p. 93 L.1

No asbestos warning on Litecast 30.

Deposition of Joseph L. Stein, dated 9/15/93, p. 93 L.5 - p. 94 L.21

Steelklad Dibond 60 BIAE never had a warning. Grefco Insulating Cement had warning at some point. Grefco Insul-Finish Cement had warning at some point. Fibrous Adhesive did not have a warning.

Deposition of Joseph L. Stein, dated 9/15/93, p. 132 L.19 - p. 133 L.12

Dibond 60 and Fibrous Adhesives never had label indicating they had asbestos but Eagle-Picher rebrands did.

Deposition of Joseph L. Stein, dated 9/15/93, p. 133 L.18 - L.21, p. 134 L.6 - L.9

Workers currently have the right to know what materials are hazardous.

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In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 81

Grefco has not conducted any studies to determine what type of respirator affords maximum protection against the inhalation of asbestos fibers.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 171

Grefco never conducted any studies to determine what type of respirator would afford maximum protection against the inhalation of asbestos fibers.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 67

Grefco never performed tests on its products to determine the amount of asbestos fiber released during usage or handling.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 43

General Refractories never conducted any studies to determine the extent of asbestos fiber exposure to users of its asbestos-containing products.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 37

Grefco never conducted any air dust level counts at locations where its asbestos-containing products were being used.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 49

Grefco admits it never conducted any field tests to determine how much dust containing fibers was created when its products were used.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 50

Grefco admits it never conducted any field tests to determine how much dust containing asbestos fibers was created when its products were removed or torn out.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 52

Grefco admits it never conducted any laboratory tests to determine asbestos emitted when its products were used.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 53

Grefco admits it never conducted any laboratory tests to determine asbestos emitted when its products were removed.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 55

Grefco admits it never provided funding for tests to determine how much asbestos was emitted when its products were used.

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In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 39

Grefco admits it never posted any signs, posters of warnings on job sites where its asbestos-containing products were being used.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 69

Grefco admits it never advised purchasers of its asbestos-containing products of the need to monitor asbestos emissions during usage.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 73

Grefco admits it never advised the users of its asbestos-containing products of the need to monitor asbestos emissions.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 74

Grefco admits it never provided written warnings to its distributors of possible asbestos health hazards.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 186
L.11 - L.15

Never specifically told people they should wear respirators when working with asbestos.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 52

General Refractories never conducted any studies concerning the effect of the inhalation of asbestos dust caused by using its products.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 32

Grefco has not conducted any tests to determine the effects of its asbestos products on users of the products.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 33

Grefco has not conducted any tests to determine the effects of inhaling asbestos fibers from its products.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 34

Grefco has not conducted any studies with the purpose of minimizing the inhalation of asbestos fibers from its products.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 12

Prior to placing asbestos-containing products on the market General Refractories did not conduct any studies to determine whether they were hazardous.

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In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 41

Grefco has never contributed any funds to research concerning asbestos and its relation to disease.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 42

Grefco has never conducted any study of asbestos-related disease.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 21

Prior to releasing its asbestos-containing products for sale General Refractories did not conduct any studies to determine their potential health hazards.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 27

After releasing its asbestos-containing products for sale General Refractories did not conduct any studies to determine their potential health hazards.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 36

Grefco did not conduct any tests or studies to determine the potential health hazards of its asbestos-containing products.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 38

Grefco has never hired a "medical director" with regard to its asbestos-containing products.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 88

Grefco admits it has never employed a full-time medical director.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 90

Grefco admits it has never consulted any physician concerning the health hazards from inhaling asbestos.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 40

Grefco has never hired an "industrial hygienist", per se.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 57

General Refractories never engaged physicians or industrial hygienists for research, investigation, or study regarding asbestos or asbestos-related diseases.

KNOWLEDGE

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PCC-GR-061

Knowledge

1932 Transactions National Safety Congress,
October 3-7, 1932.

Read page 3, Executive Committee, Ernest W.
Beck, U.S. Rubber Company, page 50, article, title
and author, page 51, paragraph 1.

"...within the last three years asbestos dust has also
been shown to produce another specific type of
reaction attended by symptoms differing in some
respects from silicosis."

PCC-GR-063

National Safety News, August 1933.

Read front page, article heading "The Mechanical
Control of Occupational Diseases", left column,
paragraph 4, sentence 1.

"...54 per cent for cases involving pneumoconiosis
(including silicosis, asbestosis, etc.)..."

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 114

Grefco admits it was a member of The Refractories
Institute.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. II-22

Grefco admits it was a member of the Industrial
Hygiene Foundation from May, 1942 until January,
1962.

OC-GE-39
(PCC-GR-129)

11/7/46 Transactions of the Eleventh Annual
Meeting of the Industrial Hygiene Foundation of
America, Inc.

Lists various articles and discussions on
occupational health and diseases and lists General
Refractories company as a member.

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OC-GE-41
(PCC-GR-136)

11/20/47 Transactions of the Twelfth Annual Meeting of the Industrial Hygiene Foundation of America, Inc., entitled, "A Better Place to Work - Transactions Bulletin No. 9."

Lists various articles and discussions on industrial health and lists General Refractories Company as a member.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 66

General Refractories was a member of the following organizations:

Industrial Health Foundation
American Industrial Hygiene Association
National Safety Council
Refractories Institute
American Ceramics Society

American Ceramic Society
General Exhibits

General Refractories was a member of the American Ceramic Society at least in 1949, 1950, 1952, and 1958. Numerous employees were members starting in 1930. American Ceramic Society Abstracts list numerous articles concerning asbestosis and a combination of silicosis and asbestosis.

[The American Ceramic Society Abstracts contain numerous references to asbestosis and silicosis/ asbestosis medical articles which provided notice of the diseases to all members of the ACS. One of the General Exhibits is an ACS application form which indicates that all members receive the abstracts. In addition, in the deposition I did this winter, Everett, a General Refractories employee, stated that the Abstracts and Journal were sent to all members until sometime in the mid 1960's when the ACS began charging separately for them. This deposition was noticed to all parties.]

Deposition of Joseph L. Stein,
dated 9/15/93, p. 122 L.21 - p.
125 L.6

He is a member of American Ceramic Society since early 1960's. Has seen Bulletin, Journal and Abstracts. Company was also a member.

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Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 40

Dates of membership:

Industrial Hygiene Foundation	1954-1981
The Refractories Institute	1961-present
National Safety Council	1930-present
American Industrial Hygiene Association	-unknown

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 21

Grefco was a member of The Refractories Institute,
Industrial Health Foundation, and the McIntyre
Foundation.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 106

Grefco was a member of the following
organizations:

Industrial Hygiene Foundation	1954-1982
Refractories Institute	1961-present
National Safety Council	1970-present
American Industrial Hygiene Association	- dates unknown

Deposition of Robert Lee
Everett, dated 2/10/94, p. 163
L.4 - L.9

Doesn't know Mr. Kurtz, Vice President of American
Refractories Corp.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 164
L.9 - p. 165 L.9, p. 165 L.12 -
L.16

American Refractories at 1935 symposium.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 44

Dr. Faulkner, MD, an independent contractor,
represented General Refractories at the 1955
Saranac Symposium.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 9 L.20 - p. 10
L.11

Awareness of silicosis during 1954-1958.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 107

Robert Bodnar, past employee of Grefco attended
meetings of the Safety and Health Committee of the
Refractories Institute.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 109

Grefco subscribed to the National Safety News.

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Deposition of Robert Lee Everett, dated 2/10/94, p. 152 - L.18 - p. 153 L.21, p. 154 L.5 - p. 156 L.11, p. 156 L.15 - p. 157 L.15, p. 157 L.19 - L.20, p. 158 L.2 - L.14, p. 158 L.21 - p. 159 L.5, p. 159 L.8 - L.13, p. 159 L.16 - p. 160 L.1, p. 160 L.7 - L.13, p. 160 L.19 - 161 L.18, p. 161 L.21 - p. 162 L.2, p. 162 L.6 - 8, p. 162 L.11 - 14, p. 162 L.17 - L.20

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 71

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 72

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 25

Deposition of Joseph L. Stein,
dated 9/15/93, p. 75 L.13 - p. 76
L.9, p. 77 L.8 - 18, p. 78 L.3 -
L.8

Deposition of Joseph L. Stein,
dated 9/15/93, p. 105 L.1 - p.
110 L.6

PCC-GR-006

He has responsibility to provide safe and healthy working environment. 1939 PA Workmen's Compensation regulations discussed asbestos and silica. Doesn't know what he would have done if he had been told about asbestosis.

Grefco admits that it was in possession of written information concerning the health hazards of asbestos exposure prior to 1964.

Grefco admits it was informed orally of health hazards relating to asbestos exposure prior to 1964.

Grefco had no warning labels on the asbestos-containing products it manufactured. Warning labels were put on rebranded Eagle-Picher products commencing June 9, 1964.

William W. Boyd was manager of specialty products. Manager at least from 1960 to late 60's when he retired. Specialty products includes castables and Fibrous Adhesive.

Eagle-Picher warnings in 1964.

Second Page of Document Written By J.M. Barnhart.

This document should be attached to the Eagle-Picher letter sent to Boyd concerning warnings. It indicates that Johns-Manville was using warnings as of October 1964.

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Deposition of Joseph L. Stein,
dated 9/15/93, p. 112 L.3 - p.
114 L.14, p. 114 L.17 - p. 116
L.16

Boyd's reply to Eagle-Picher notice of warnings and
labeling of Eagle-Picher rebrands.

OC-GE-49
(OC Stipulation)

6/9/64 letter from William H. Boyd to John P.
Harrington re: caution note.

Read heading, paragraph 1.

Letter from General Refractories to Eagle Picher
states that, "I assume [the note] will be in rather
small print and not too prominent on the bags, and
therefore feel we may as well have the same
caution note on our bags when they are reordered."

Macon v. AC&S, Dauphin Cty.,
PA, Interrogatory No. 13

No warnings on products manufactured by Grefco.
June 9, 1964 E-P put warning label on re-brand
products. Warning is quoted.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 166
L.11 - p. 167 L.13, p. 168 L.13 -
L.16, p. 168 L.21 - p. 169 L.8, p.
169 L.11 - L.18, p. 169 L.21 - p.
170 L.2, p. 170 L.19 - p. 171 L.2,
p. 171 L.9 - p. 172 L.13, p. 172
L.16 - p. 173 L.5 - L.11, p. 173
L.15

Not aware of Eagle Picher warning. Doesn't know
what he would have done if he had been told.
Doesn't know what he would have told employees
about respirators. He would like to know what
materials he needs a respirator for.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 36 L.1
- L.8, p. 36 L.10 - L.13
Deposition of Joseph L. Stein,
dated 9/15/93, p. 104 L.2 - L.17,
p. 104 L.19 - L.21

At St. Louis he was not aware of any diseases
including silicosis even though he worked with silica.

Doesn't know if he would have told anyone about
the diseases if he had known in 1967.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 38 L.9
- p. 39 L.19, p. 40 L.1 - L.3

Doesn't clearly remember a safety program.
Promoted to Plant Manager in 1968. Fibrous
Adhesive and Litecast 30 produced there.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 41 L.6
- L.19

Became aware of silicosis at Sproul.

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Deposition of Robert Lee
Everett, dated 2/10/94, p. 53
L.12 - L.17

Respirators were made available to employees but
they were not told when to wear them.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 54
L.15 - p. 55 L.10, p. 55 L.12 -
L.16

X-rays were taken due to use of silica.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 58
L.12 - L.13, p. 58 L.15 - p. 59 L.5

There have been some awards for silicosis.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 72
L.19 - p. 73 L.5

He had no knowledge at the time that the Grefco
cement contained asbestos.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 40

At least 25 employees are receiving disability
payments.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 41

Grefco does not know if any employees are
suffering or have died from lung cancer.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 42

Grefco does not know if any employees are
suffering or have died from mesothelioma.

Martin v. Grefco, Allegheny Cty.,
PA, dated 1/18/84, Interrogatory
No. 48

It appears at least some Grefco x-rays showed
"pneumoconiosis."

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 68

Grefco did not place warnings on Litecast 30 and
30G and Fibrous Adhesive, but since 1970 has
provided MSDS to customers upon request.

Thurman v. A.P. Green, St.
Louis, MO, dated 7/17/87,
Interrogatory No. 73(b)

General Refractories does not contend that prior to
1971 there was no substitute for asbestos for high
and low heat insulation.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 132
L.17 - p. 133 L.12

Does not recall problems in reformulating Litecast
30.

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Deposition of Robert Lee
Everett, dated 2/10/94, p. 186
L.16 - 19

When switched over to asbestos free Litecast 30
they first used up the asbestos.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 117
L.20 - p. 118 L.3

No effort to tell employees who worked with Litecast
30 and Fibrous Adhesive that they should be
checked for asbestosis.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 187
L.16 - L.21

Didn't tell workers they should take precautions after
the decision was made to reformulate the products.

Abate v. ACandS, Baltimore
City, dated 12/27/93,
Interrogatory No. 219

Grefco did not recall any asbestos-containing
products after it became aware of the potential
health hazards of asbestos exposure.

Deposition of Roland Howard
King, dated 7/10/85, p. 24 L.6 -
p. 26 L.3

Admits found out about asbestos problem and
started having Nicolet wax the edges.

In Re: Asbestos Cases,
Baltimore City, MD, dated
5/13/92, Interrogatory No. 50

Grefco's current document retention policy was
implemented in January, 1973.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 111
L.19 - p. 113 L.8

In 1973 they did not believe they should be handling
asbestos so they started buying asbestos-containing
fibrous adhesive from a vendor (**it was J-M**) rather
then make it.

In Re: Asbestos Cases,
Baltimore City, MD, dated
7/8/88, Requests for Admission
No. 70

Grefco admits that it did not recommend respirators
for users of its products in 1964, 1966, 1968, 1970,
1972, and 1975.

Deposition of Roland Howard
King, dated 7/10/85, p. 12 L.16 -
p. 13 L.16

Asbestos removed from Dibond 60 in 1980. That is
the first he was made aware of asbestos hazard.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 249 L.15 - p.
250 L.21

General Refractories was disposing of asbestos
waste in 1980 so as not to be covered by new
regulations.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 124
L.17 - p. 125 L.15

First air sampling in the plant was conducted by
OSHA in 1983 or 1984.

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Deposition of Robert Lee
Everett, dated 2/10/94, p. 128
L.14 - p. 129 L.17, p. 129 L.20 p
p. 130 L.1

He would still do air sampling even if it were not now
required.

Deposition of Robert Lee
Everett, dated 2/10/94, p. 149
L.9 - L.14

General Refractories told him to start keeping
records on hazardous materials in the late 1980's.

Deposition of Joseph L. Stein,
dated 9/15/93, p. 127 L.4 - L.12,
p. 127 L.14 - p. 128 L.7, p. 128
L.12 - p. 129 L.11

President of company for seven years but doesn't
know what their respiratory protection program is.
Still, he is concerned about health of employees
more than outsiders.

[lisa\grefco\trlpres.doc]