

100 PRINCE BUILDING
PITTSBURGH, PENNSYLVANIA 15222
TELEPHONE 412-471-1000
FAX 412-471-0012
MULTICOMMUNICATIONS SERVICE, INC.

June 4, 1993

File No.: Kanawha Mass III

Cathy S. Gatson, Clerk of Court
Kanawha County Courthouse
500 Quarrier Street
Charleston, WV 25329

RE: In Re: Asbestos III. Civil Action 92-C-8888

Dear Ms. Gatson:

Enclosed for filing please find a Certificate of Service of Answers and Objections of Plibrico Company to Plaintiffs' Joint Interrogatories and Request for Production of Documents Concerning Product Identification. Copies of the Answers have been sent to all known counsel of record.

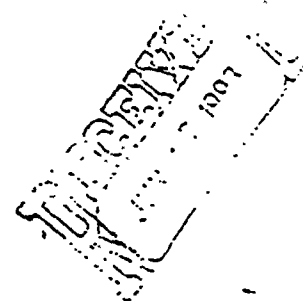
Sincerely,

Patrick J. Loughney

PJL/keb

Enclosure: Certificate of Service

cc w/enc: Theodore Goldberg, Esquire
James F. Rion, Jr., Esquire
Scott S. Segal, Esquire
John Suman, Esquire
James P. Humphreys, Esquire
✓ David L. Meade, Esquire
William Field, Esquire
All Defense Counsel of Record



- (c) If such activity was terminated, the reason(s) why;
- (e) The geographical area into which you claim the asbestos-containing product(s) were sold;
- (f) Identify the organizational unit of defendant so engaged;
- (g) The site(s) at which each such product was manufactured, sold purchased or used;
- (h) The material components/ingredients of each such product, giving specific or approximate percentage both by weight and by volume of each material component/ingredient (this interrogatory is not limited to the asbestos component of the product but seeks information as to the nature, weight and volume of non-asbestos ingredients, as well) of each such product; and
- (i) The specific type of asbestos fiber, i.e., chrysotile, amosite, crocidolite, used as a component of each asbestos-containing product.

ANSWER: (a) through (c), For certain time periods, Plibrico manufactured and sold Plicast Airlite and Plicast LWI-24G which contained asbestos. Plicast LWI-24 and other Plicast LWI products never contained asbestos. Plibrico manufactured asbestos-containing Plicast Airlite and Plicast LWI-24G until sometime in 1972; Plicast Airlite and Plicast LWI-24G did not contain asbestos after sometime in 1972. Based on information and belief, the manufacture and sale of both products commenced in the mid 1950s; investigation is continuing.

On information and belief, Plibrico commenced the sale of asbestos containing Plisulate Insulating Cements Nos. 101 and 102 from 1963 to 1972, although investigation continues on this issue. Asbestos containing Plisulate Insulating Cement No. 101 and 102 were available nationally until 1972, but Plibrico has no present or actual knowledge on when and where sales of this product were actually made. Upon information and belief, and pursuant to further investigation of company records and other information obtained from various sources,

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce copies of all records that show sales, receipt, use, re-sold, distribution, inventory, re-order, shipment, bill of loading, or orders of asbestos containing products.

ANSWER:

SUMMARY OF SALES IN WEST VIRGINIA AND SURROUNDING AREAS

To Triangle Conduit and Cable, Glendale, WV one five gallon can of Plisecal, sold 9/20/56.

To California State College, California, PA (Washington Co.), thirteen 50-pound bags of Plisulate 101 or 102 cement, shipped 11/8/66.

To Bottom House at Weirton Steel Division, National Steel Corporation, Weirton, WV, fifteen 50-pound bags of Plicast Airlite, shipped 6/17/69.

To Site unknown, sold to WV Bureau of Mines, one bag (40 or 50 pounds) of Plicast Airlite, 1/23/70.

To Site unknown, sold to WV Bureau of Mines, six bags of Plicast Airlite, 2/9/70.

Attached are documents in response to Plaintiffs' Request for Production of Documents.

PURCHASE ORDER

VENDOR'S COPY

Please Supply the Following as Directed

VENDOR'S USE ONLY (SEE INSTRUCTIONS)

TO: PENNA. 15419

NAME SAME

ORDER NO. 10246-01

INDEX NO. 31 PURCHASE REGISTRATION NO. 10246

ESTIMATION (LESS OTHERWISE SPECIFIED) DELIVERY DATE 11/14/66 PROPOSAL OPENING DATE 10/20/66

SCATS SECTION NO. ORGANIZATION UNIT NO.

67256
PLIBRICO SALES & SERVICE CO.
615 WASHINGTON ROAD
PITTSBURGH, PENNA. 15226

ISSUANCE OF ORDER APPROVED BY:

33/POPE/787-5160/SL

LINE NO.	QUANTITY	UNIT	UNIT PRICE	AMOUNT
1	500	LESS CWT	8.30	41.50
2	100	LESS CWT	7.80	7.80
3	50	LESS BAG	3.93	3.93
4	500	LESS CWT	7.80	39.00
LUMP SUM TOTAL				92.23
NET 60 DAYS				

THE COMMONWEALTH OF PENNSYLVANIA
IS REGISTERED WITH THE INTERNAL
REVENUE SERVICE TO MAKE TAX
FREE PURCHASES
REGISTRATION NUMBER
A-149585

DATE	AMOUNT	NUMBER OF	AMOUNT OF	AMOUNT OF
11/16/66	12	5	15201399	

LOCAL BIDS - CENTRAL AWARDS

INVITATION - BID PROPOSAL

COMMONWEALTH OF PENNSYLVANIA - DEPARTMENT OF PROPERTY AND SUPPLIES - BUREAU OF PURCHASES

Sealed Bids in DUPLICATE, subject to the CONDITIONS shown on the reverse hereof, will be received by the Institution named below until the due time and date indicated, after which time the bids will be forwarded to the Department of Property and Supplies in Harrisburg for award.

DUE DATE	DUE TIME	MAILING DATE	ITEMS TO BE DELIVERED FOR AGENCY STORAGE
October 20, 1966		10-6-66	California State College
INQUIRY NUMBER -			California, Pennsylvania 15419
10-10246			

DESCRIPTION OF ARTICLES	QUANTITY	UNIT	UNIT PRICE	TOTAL AMOUNT
Baffle Mix standard castable hydraulic setting develops good strength when mixed with water may be poured, tamped, troweled or gunned. Plibrico Co. Mfg. Ohio	500	lbs.	8 30	41 80
Asbestos Retort Cement extremely durable, iron will melt where this cement will stand. Plibrico Co. Mfg. Chicago Ill	100	lbs.	7 80	7 80
Dry asbestos cement for insulating and pathhing. Plibrico Co. Mfg. - Illinois	50	lbs.	3 93	3 93
Asbestos insulating cement - cement should have excellent insulating value. Reasonably hard, with superior sticking characteristics. Plibrico Co. - Mfg. Illinois	500	lbs.	7 80	39 00
Number of days required to make delivery after receipt of order			7 DAYS	
Failure to answer the above question may disqualify bid.				92 23
Order will be made on total lump sum basis.				

CASH DISCOUNT OFFERED:

ENDOR HEREBY AGREES THAT IN THE EVENT OF AN AWARD IF PAYMENT IS MADE WITHIN SIXTY (60) DAYS AFTER RECEIPT OF MATERIAL, HE WILL OFFER THE COMMONWEALTH A No DISCOUNT

NO BID WILL BE CONSIDERED UNLESS BID PRICE IS FIRM WITHOUT QUALIFICATION.

BID

In compliance with the above invitation for bids, and subject to all the conditions thereof, the undersigned offers and agrees, if this bid be accepted, to furnish any or all items upon which prices are quoted, at the price and at the time set opposite each item, delivered at the point(s) as specified.

This bid will remain firm to 12/1/66 19 66 Unless time is limited by bidder, bid will remain firm for thirty (30) days.

QUOTED AT Pittsburgh Pennsylvania THIS 17th DAY OF October 19 66

SIGN IN INK (SEAL) TITLE Secretary
(OWNER, PARTNER, OR CORPORATE OFFICER)

FIRM NAME AND/OR ADDRESS BELOW IS IN ERROR. MAKE NECESSARY CORRECTIONS.

Due: 10-20-66

Plibrico Sales & Service Co.
300 W. Lebanon Blvd. 615 Washington Road
Pittsburgh Pa, Pennsylvania 15228