III. G.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA.
MIAMI DIVISION

NO. 75-1365- Civ- JLK

PLAINTIFF'S EXHIBIT
JM-2481

EVELIO LOPEZ, CHARLES BENDER, MOSES JOYNER, and RUTH STRANGE HUTSON, etc.

Plaintiffs

vs.

ARMSTRONG CORK COMPANY, etc., et. al.,

Defendants.

DEFENDANT JOHNS-MANVILLE PRODUCTS CORPORATION'S ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendant JOHNS-MANVILLE PRODUCTS CORPORATION answers Plaintiff's First Set of Interrogatories under oath and within the time prescribed by law, in the same numerical order as propounded.

chms.
HIGH, STACK, DAVIS & LAZENBY
Attorneys for Defendant
Johns-Manville Products Corp.
100 N. Biscayne Boulevard
Miami, Florida 33132

By: _____
Norman S. Segall
305-377-8351

1. Answer:

Dennis H. Markusson
Counsel
Johns-Manville Corporation
Greenwood Plaza
Denver, Co. 80217

Edmund M. Fenner
Director, Environmental Services
Johns-Manville Sales Corporation
Denver, Co. 80217

Patrick O'Hagen
Environmental Coordinator
Johns-Manville Sales Corporation
Greenwood Plaza
Denver, Co. 80217

2. Answer:

Yes, on January 12, 1927 organized as "Delaware Johns-Manville Corporation"; January 18, 1927 name changed to "Johns-Manville Corporation of Delaware"; in May 1932 name changed to "Johns-Manville Products Corporation"; on December 31, 1975 Johns-Manville Products Corporation was merged with Johns-Manville Sales Corporation. The name of the surviving corporation is "Johns-Manville Sales Corporation", Greenwood Plaza, Denver, Co. 80217. Defendant was authorized to do business in the State of Florida.

3. Answer:

Yes

4. Answer:

Defendant Johns-Manville Products Corporation did not engage in the mining of material containing asbestos fiber. However, Defendant did engage in the sale of industrial insulation products containing asbestos.

5. Answer:

Yes.

6. Answer:

(A) See Exhibit A attached hereto for industrial insulation products containing asbestos manufactured and/or marketed by Johns-Manville Products Corporation. Trade names are in capital letters.

(B) See Exhibit A attached hereto.

(C) See Exhibit A attached hereto.

(D) See Exhibit B attached hereto for the type of asbestos contained in each product. See objections to other requested information.

(E) See Exhibit A attached hereto.

(F) The intended use for each product was for general insulation applications for protection against heat, cold, and noise. Specific uses are and have been within the sole discretion of purchasers.

(G) Johns-Manville Products Corporation.

7. Answer:

Yes.

9. Answer:

Yes.

12. Answer:

Yes.

14. Answer:

The tests which Defendant has made or paid for directly or indirectly constitute an on-going program and are not towards particular products but toward industrial insulation products containing asbestos in general.

15. (1)a. Saranac Laboratory of the Trudeau Foundation, New York, 1928. Sponsored by Metropolitan Life Insurance Company with funds contributed by Defendant and/or Johns-Manville Corp.

b. Results published by Dr. Leroy V. Gardner in Vol. 13 No. 3 (March 1931) of Journal of Industrial Hygiene.

(2) a. Industrial Hygiene Division of the Department of Public Health of the McGill University Medical School, Montreal Canada, Defendant and/or Johns-Manville Corporation, along with others in the asbestos industry, asked Metropolitan Life Insurance Company to conduct this study.

b. Results published in the Public Health Reports Vol. 50, No. 1 (1935) by A. J. Lanza, et al.

(3) a. Saranac Laboratory 1952 undertaken by Quebec Asbestos Mining Association, of which Johns-Manville Corporation was and is a principal member.

b. Report delivered to the Seventh Saranac Lakes Symposium in 1952, entitled "Pulmonary Function Studies in Men Exposed for Ten or More Years to Inhalation of Asbestos Fibers" by Fernand Gregoire and George W. Wright.

(4) a. Industry-sponsored studies at Saranac Laboratory 1951, Arthur J. Vorwald, Thomas M. Durkin and Philip C. Pratt.

b. Results appear in A.M.A. Archives of Industrial Hygiene and Occupational Medicine January, 1951, Vol. 3, Page 1.

(5) Early 1950's animal research project by Arthur J. Vorwald at Saranac Lake funded by Quebec Asbestos Mining Association.

b. Results contained in report entitled "Asbestos and Pulmonary Cancer" by Arthur J. Vorwald.

(6) a. Study sponsored by Q.A.M.A. and funded in part by Johns-Manville Corporation conducted by Daniel C. Braun and T. David Truan for the Industrial Hygiene Foundation of America, Pittsburgh, Pennsylvania.

b. Results published June, 1958 in the A.M.A. Archives of Industrial Health, Vol. 17, Page 634.

(7) a. Test conducted by Industrial Hygiene Foundation of America, Paul Gross, et. al. completed July, 1968 using asbestos fiber supplied by Johns-Manville Corporation.

b. Results are published in study entitled "The Pulmonary Response to Coalinga Asbestos Dust: A Preliminary Investigation".

(8) a. Numerous personnel and data of this corporation have been contributed to a seven to ten year environmental clinical and epidemiological study of workers exposed to asbestos now being conducted by the Division of Occupational Health of the United States Public Health Service entitled "Asbestos Industry Study: U.S. Public Health Service".

b. Numerous reports based on said studies have been made and are of public record.

(9) a. Mt. Sinai School of Medicine City University of New York. Study funded by Johns-Manville Corporation November 1, 1969 to October 31,1970. (b) entitled "Biological Effects of Modified Inorganic Fibrous Microparticles".

(10) a. Study funded by Johns-Manville Corp. by R. J. Schnitzer and F. L. Pundsack (an employee of this Defendant) 1969.

b. Report entitled "Asbestos Hemolysis" published in Environmental Research, Jan. 1970.

(11) a. Johns-Manville Corporation has contributed to the Industrial Hygiene Foundation of America's "Fibrous Dust Study."

b. Various reports related to and/or based on this study include the following:

"Proceedings Fibrous Dust Seminar" of the Industrial Hygiene Foundation of America, published in its Medical Series Bulletin No. 16-70 (November 22, 1968).

"Experimental Asbestosis: The Development of Lung Cancer in rats with Pulmonary Deposits of Chrysotile Asbestos Dust" by Dr. Paul Gross, et al., published in the Archives of Environmental Health, Vol. 16, (Sept. 1967).

"The Pulmonary Response to Fibrous Dusts of Diverse Compositions" by Dr. Paul Gross, et al., published in the American Industrial Hygiene Association Journal, Vol. 31 (March, April, 1970).

"Ferruginous Bodies in Guinea Pigs" by John M. G. Davis, et. al., published in the Archives of Pathology, Vol. 89, (April, 1970).

"Pulmonary Ferruginous Bodies" by Dr. Paul Gross, et al., published in the Archives of Pathology, Vol. 85 (May, 1968).

"Pulmonary Ferruginous Bodies in City Dwellers, A Study of Their Central Fiber" by Dr. Paul Gross, et al., published in the Archives of Environmental Health, Vol. 19 (August, 1969).

"Ferruginous Bodies in Human Lungs" by Michael D. Utidjian, et al., published in the Archives of Environmental Health, Vol. 17 (September, 1968).

"Asbestos Bioeffects Research for Industry" by the Industrial Hygiene Foundation of America, Inc., published in its Medical Series, Bulletin No. 11 (1966).

(12) a. Study commencing 1969 sponsored by Q.A.M.A. in which this Defendant additionally contributes time of its personnel.

b. Reports based on the foregoing are:

"Asbestosis in Asbestos Cement Workers" by Philip E. Enterline, and Hans Weill, presented at LYON Conference, (Oct. 1972)

"Radiographic and Physiologic Patterns Among Workers Engaged in Manufacture of Asbestos Cement Products, a Preliminary Report," by Hans Weill, et al., published in the Journal of Occupational Medicine, Vol. 15 (Mar. 1973).

"Lung Function Consequences of Dust Exposure in Asbestos Cement Manufacturing Plants " by Hans Weill, et al., published in Archives of Environmental Health, Vol. 30 (February, 1975).

(13) a. Institute of Occupational and Environmental Health of Q.A.M.A. Dr. J. C. McDonald of McGill University, Montreal, Canada.

b. The following reports are based upon this study:

"Qualitative Aspects of Dust Exposure in the Quebec Asbestos Mining and Milling Industry" by G. W. Gibbs, presented at the Third International Symposium on Inhaled Particles, British Occupational Hygiene Society, London (September, 1970).

"Epidemiology of Primary Malignant Mesothelial Tumors in Canada" by A. D. McDonald, et al., published in CANCER Vol. 25, No. 4 (October, 1970).

"Mortality from Lung Cancer and Other Causes in the Chrysotile Asbestos Mines and Mills of Quebec" by Dr. J. Corbett McDonald, et al., published in the Archives of Environmental Health Vol. 22 (June, 1971).

"Recent Developments in Asbestosis" by Dr. Premysl V. Pelnar, published in Studia Laboris et Salutis (1970).

(14) a. Dr. Kenneth W. Smith, a former employee of the corporation conducted several studies.

b. Reports of Dr. Smith are as follows:

"Asbestosis" printed in The Pneumoconioses by Kennety W. Smith (approximately 1963).

"Pulmonary Disability in Asbestos Workers" by Kenneth W. Smith printed in the A.M.A. Archives of Industrial Health, Vol. 12 (August, 1955).

"Trends in the Health of the Asbestos Worker" by Kenneth W. Smith published in the Annals of the New York Academy of Sciences, Vol. 132, Art. 1 (Dec. 1965).

16. Answer:

Yes.

17. Answer:

(A) See answer to Interrogatory No. 15, above.

(B) See answer to Interrogatory No. 15, above.

18. Answer:

See Exhibit C attached hereto.

19. Answer:

(A) See answer to Interrogatory No. 18, above.

(B) Fred Pundsack, Senior Vice President, Research and Development.

20. Answer:

See answer to Interrogatory No. 15 above. In addition in 1968, Johns-Manville joined in the establishment of the Insulation Industry Hygiene Research Program of Mt. Sinai Hospital. The purposes of this study are:

(1) To develop improved methods of minimizing inhalation by insulation workers of dust and fumes encountered in their work;

(2) To disseminate knowledge of those improved methods of dust and fume control wherever they may be applied advantageously; and

(3) To offer cooperation, advice and assistance toward universal adoption of these methods.

The Program Director is Irving J. Selikoff, M.D., Director of the Environmental Sciences Laboratory, Mt. Sinai School of Medicine, New York, New York. These studies have not been concluded. Reports have been published from time to time and circulated to the trade through the union and are presumably available to Plaintiff's attorney through the Director of the Program, Dr. Irving J. Selikoff. In 1969-1970, at Defendant's Research and Engineering Center at Manville, New Jersey, tests were conducted for the Insulation Industry Hygiene Research Program by Thomas J. Weeks and Allen F. Burns, published in the American Industrial Hygiene Association Journal (May-June, 1970).

Defendant, through its membership in the National Insulation Manufacturers Association has funed, in part, the studies conducted by Dr.Clark Cooper, et al., at the University of California at Berkeley. The following have been generated by this study:

"Industrial Hygiene for Insulation Workers", by J. LeRoy Balzer, published in the Journal of Occupational Medicine (Jan. 1968).

"Environmental Exposures in the Insulation Trade" by J. LeRoy Balzer, published in the NICA Outlook (April 1970).

"Evaluation and Control of Asbestos Exposures in the Insulating Trade", by Clark W. Cooper and J. LeRoy Balzer, 2nd International Conference Biological Effects of Asbestos, Dresden, (1968).

"Asbestos in Relation to the Type of Fibre and Dose in the Insulation Industry", by W. Clark Cooper and J. Miedema, LYON Conference (Oct. 1972).

Additionally, an epidemiological study on the biological effects of asbestos dust among the Port of Genoa and LaSpezia Arsenal workers, among others, is being conducted by the Clinical del Lavoro, Milano, Italy, under the sponsorship of the Institute of Occupational and Environmental Health, which Institute, in turn, is funded by the Quebec Asbestos Mining Association. This study was initiated early in 1968 and has generated the following report:

"Research Project: Epidemiological Study on the Biological Effects of Asbestos Dust at the Balangero Mine and among the Port of Genoa and LaSpezia Arsenal

Insulation Workers" by Enrico C. Vigliani (June 16, 1972.

21. Answer:

See answer to Interrogatory No. 20, above.

22. Answer:

See answers to Interrogatories No. 15 and 20 above.

23. Answer:

See answers to Interrogatories No. 15 and 20 above.

24. Answer:

See answer to Interrogatory No. 18, above.

25. Answer:

See answers to Interrogatories No. 18 and 19 above.

26. Answer:

Yes.

27. Answer:

Defendant states that it does not understand what Plaintiff means by injury resulting from the use of the products. Once theproducts have beeninstalled, they are essentially immobile and not used by workers. They merely become an integral part of a functioning system. If, however, Plaintiff's question has reference to the handling and/or application and/or installation of Defendant's products by insulation workers so that such products may serve their end use, then Defendant answers as follows:

Defendant makes regulation inspections of areas where workers who are employed by Defendant are working with finished insulation products manufactured by Defendant which contain asbestos.

Defendant has affixed caution labels on the packaging of it s industrial products which contain asbestos as follows:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.

INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST.

IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCO_ NIOSIS-PRODUCING DUSTS.

(1964-1970)

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.

AVOID BREATHING THE DUST. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, USE PROPER PROTECTION.

IF PROPER DUST CONTROL CANNOT BE PROVIDED, RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PROTECTION AGAINST PNEUMOCONIOSIS-PRODUCING DUSTS SHOULD BE WORN.

(1970-1972)

CAUTION

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE

SERIOUS BODILY HARM

(1972-Present)

These warnings or some modification thereof are used on the packaging of industrial insulation products of Defendant which contain asbestos which might release asbestos dust upon installation.

Defendant conducts regular safety and proper housekeeping programs at their facilities in accordance with the requirements of the Occupational Safety and Health Administration (OSHA) standard for exposure to asbestos dust.

Defendant requires their insulation installers to use respirators approved by NIOSH (Formerly the responsibility of the U.S. Bureau of Mines) in accordance with the requirements of the Occupational Safety and Health Administration (OSHA) standard for exposure to asbestos dust.

Defendant follows established and proven safe operating practices. These practices include those outlined in the National Insulation Manufacturers Association safe practices booklet as follows:

> "Recommended Health Safety Practices for Handling and Applying Thermal Insulation Products Containing Asbestos" (1968).

With respect to areas where workers who are not employed by Defendnat are working with industrial insulation products manufactured by Defendant which contain asbestos, Defendant has no jurisdiction over these people or any right to inspect the premises of their employers who are independent contractors and independent of Defendant. Defendant has however, (a) fixed clear warning labels on the packaging of industrial insulation products manufactured by Defendant which contain asbestos; and (b) participated in the educational program conducted by the National Insulation Manufacturers Association designed to teach safe and healthful operating procedures to the employers; and (c) continues research

as set forth in Answer to Interrogatories No. 15 and 20 above.

32. Answer:

Yes.

33. Answer:

Johns-Manville Products Corp. sold to Johns-Manville Sales Corp. through Johns-Manville Corporation.

37 . Answer:

Yes.

41. Answer:

Defendant's parent corporation has belonged to various organizations.

42. Answer:

(A) and (B)

(QAMA)
Institute of Occupational Environmental Health
Suite 412, 5 Place Ville Marie
Montreal, Canada H3B 2G2
(approx. 1931 to the present)

Thermal Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, N.Y. 10017
(Approx. 1969 to present)

National Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, N.Y. 10017
(approx. 1958 to 1968)

Asbestos Information Association/North America
Suite 914, 1660 L St., N.W.
Washington, D.C. 20036
(approx. 1971 to present)

Asbestos Cement Pipe Producers Association
Suite 113, 1875 Connecticut Ave.
Washington, D.C. 20081
(approx. 1972 to present)

Asbestos Cement Product Assn. (defunct)
New York, New York
(approx. 1955 to 1967)

Asbestos Textile Institute
P.O. Box 239
Pompton Lakes, N.J. 07442
(Approx. 1946 to 1973)

(C) Defendant respectfully refers the Plaintiff to said organizations for the names of any publications published by or written by such association or organization.

43. Answer:

See Exhibit D attached hereto.

49. Answer:

Unknown at the present time.

50. Answer:

Answer depends upon further discovery.

51. Answer:

Answer requires further discovery.

52. Answer:

Answer requires further discovery.

53. Answer:

Yes.

54. Answer:

Name and address of expert witnesses not yet available.

55. Answer:

Defendant has recognized since approximately 1930, that with respect to mining and manufacturing workers who were dealing with raw asbestos that the inhalation and retention in the lungs of excessive quantities of asbestos dust and fibers in the continuing course of employment over a long period of time under certain conditions may cause physical harm to some individuals.

57. Answer:

Not Applicable.

58. Answer:

Such products were sold in boxes and/or cartons and/or packages and/or skids and/or bales. Also see Exhibit A for dates products were manufactured and trademarkes that appeared thereon.

AFFIDAVIT

STATE OF COLORADO)
) ss:.
COUNTY OF ARAPAHOE)

G. EARL PARKER, being duly sworn according to law deposes and says that he is Assistant Secretary and Vice President of JOHNS-MANVILLE SALES CORPORATION, successor by merger to JOHNS-MANVILLE PRODUCTS CORPORATION, a defendant in this action, that he is authorized to take this Affidavit on its behalf and that the facts set forth in the foregoing pleading are true and correct to the best of his knowledge, information and belief.

G. Earl Parker
G. EARL PARKER

Sworn and subscribed to
before me this 15th day
of March, 1976.

NOTARY PUBLIC

My Commission expires Nov 19, 1979

EXHIBIT A

PRODUCT	Date Manufactured	Date Discontinued
Block		
85% Magnesia	1902	1970
SUPEREX-M	1930	1970
SUPEREX 1900	1922	1972
SUPEREX 2000		1972
SUPEREX-SG	1969	1972
THERMOBESTOS	1939	1973
MIN-K 500	1958	1974
MIN-K 1301	1958	1974
MIN-K 2000	1959	1974
SONITE	1969	1974
Pipe		
ASBESTOCEL (aircell)	1902	1965
ANTI-SWEAT	1903	1965
85% Magnesia	1902	1970
SUPEREX-M	1930	1970
SUPEREX 1900	1922	1972
THERMOBESTOS	1939	1973
Silicated THERMOBESTOS	1966	1973
METAL-ON	1959	1973
Sheets		
ASBESTOCITE	1927	1975
FLEXBOARD	1927	1975
102 Asbestos Millboard	1918	
106 Asbestos Millboard	1918	
106B Asbestos Millboard	1918	
106H Asbestos Millboard	1918	
C Asbestos Millboard	1918	
219 Asbestos Millboard	1918	
XXX Asbestos Millboard	1918	
Type A Asbestos Millboard	1918	
101 Asbestos Millboard	1938	unknown
103 Asbestos Millboard	1938	unknown
105 Asbestos Millboard	1938	unknown
Board		
Flat TRANSITE	1930	
MARINITE 36	1955	
MARINITE 65	1955	
Veneered MARINITE	1955	
Metal Veneered MARINITE	1951	1973
TRANSITE Acoustical Panel	unknown	
DEKERAN	1970	1975
TRANSITE Core Plate	1938	
REEFERITE	1950	1973
Imperial MARINITE	1957	1973
Marine Veneer	1938	
Marine Acoustical Unit	1961	
MARINITE 23	1955	
MOLTEN METAL MARINITE	1962	
Heat Treated MOLTEN METAL MARINITE	1966	
MARINITE 30	1949	1970
MARIMET 45	1970	
PALLITE	1937	1973
Submarine Bulkhead	1963	1967

PRODUCT	Date Manufactured	Date Discontinued
Finishes		
AERTITE	1926	
INSULKOTE SG	1929	
INSULKOTE ST	1929	
INSULKOTE ET	1929	
Paper, Felt, Blankets		
Asbestos Roll FIRE FELT	1891	1973
CEILINITE	1910	1973
D. C. FLEXSTONE	1929	
Asbestos FIRETARD	1931	
#50 Asbestos Weatherproofing Felt	1931	
Commercial Grade Asbestos Paper	1929	
FIBROID Asbestos Paper	1930	
Welding Paper	1930	
Long Fiber Asbestos Paper	1930	
High Strength FIBROID Asbestos Paper	1930	
DOUBLEX Asbestos Paper	1936	
Non-Burn Asbestos Paper	unknown	
ARMATURO Asbestos Paper	unknown	
MICROBESTOS	1959	
12# Asbestos Tape	unknown	
15A Asbestos Jacket	1931	
45A Asbestos Jacket	1931	
7700 Coated Asbestos Jacket	1931	
NIAGRITE	1953	1973
ARP-40		
Asbestos Turbine Blanket	1951	
High Temperature Flexible MIN-K blankets	1963	1974
Standard Flexible MIN-K blankets	1963	1974
MIN-KLAD	1958	1972
Asbestos FIRE FELT	1891	1962
ASBESTOS-SPONGE FELT	1890	1961
Pan-O-Cel	1924	1959
Super FIRE FELT	1925	1949
Thermo FIRE FELT	1924	1949
Vitribestos	1907	1959
Vitro FIRE FELT	1924	1949
Asbestos Pipe Blanket	1898	1960
Engineers Insulating Tape	1926	1956
Asbestos Jelly Rolls	1930	1968
White Surface Asbestos Jacket	1931	1968
THERMOMAT	1963	1969
THERMOWRAP	1951	1954
THERMOTAPE	1951	1964
Sealing Compounds		
ALBASEAL	1953	
DUXSEAL	1957	
Body Sealer	1954	1975
TRANOLSEAL	1958	1971
UNISEAL	1957	1974
Industrial Vent Caulking	1957	1974
Type T NODRSEAL	1954	1975
NODRSEAL	1953	1975
BRANCHTITE	1954	
H-NAVASEAL	1951	1975
HF -NAVASEAL	1955	1975
Stove Putty	1952	1971

PRODUCT	Date Manufactured	Date Discontinued
Cements		
SUPEREX Cement	1931	1973
THERMOBESTOS Cement	1959	1969
LAPTITE Cement	1952	
FIREITE Furnace Cement	1954	1973
Heat Treating Cement	1954	1973
Fibrous Adhesive	1930	
302 Cement	1930	1970
352 Cement	1930	1973
301 Cement	1953	1971
450 Cement	1930	1972
500 Cement	1933	1972
85% Magnesia Cement	1931	1970
ASBESTOMENT	1930	1970
MX-3808 Asbestos Filler	1951	1970
THERMOMIX 700	1966	1970
THERMOMIX 720	1966	1970
THERMOMIX 770	1966	1970
Fil Insul.	1930	1969
300 Cement	1932	1970
319 Semi-Refractory Cement	1930	1969
678 Semi-Refractory Cement	1941	1969
304 Cement	1931	1969
340 Cement	1931	1969
0352 Cement	1931	1969
400 Cement	1931	1969
364 Cement	1930	1955
ASBESTILE Cement	1930	1958
FIBROFIL	1940	1969

EXHIBIT B

LIST OF INSULATION PRODUCTS BY ASBESTOS TYPE

CHRYSOTILE

Block

85% Magnesia
Superex-M
Superex 1900
Thermobestos
Superex-SG
Superex 2000

Pipe

85% Magnesia
Superex-M
Superex 1900
Thermobestos
Metal-On
Silicated Thermobestos

Sheets

Asbestocite
Flexboard
102 Asb. Millboard
106 Asb. Millboard
C Asb. Millboard
219 Asb. Millboard
XXX Asb. Millboard
106B Asb. Millboard
106 H Asb. Millboard
Type A Asb. Millboard

Board

Flat Transite
Marinite 36
Marinite 65
Veneered Marinite
Metal Veneered Marinite
Transite Acoustical Panel
Dekeran
Transite Core Plate
Reeferite
Imperial Marinite
Marine Veneer
Marine Acoustical Unit

Finishes

Aertite
Insulkote SG
Insulkote ST
Insulkote ET

Paper, Felt, Blkt

Asbestos Roll Fire Felt
Ceilinite
D. C. Flexstone
Asbestos Firetard
#50 Asb. Weatherproofing Felt
Commercial Grade Asb. Paper
Fibroid Asb. Paper
Welding Paper
Long Fiber Asb. Paper
High Strength Fibroid Asb. Paper
Doublex Asb. Paper
Non-Burn Asb. Paper
Armaturo Asb. Paper
Microbestos
12lb. Asbestos Tape
15A Asbestos Jacket
45A Asbestos Jacket
7700 Coated Asbestos Jkt.
Niagrite
ARP-40

Cements

Superex Cmt.
Thermobestos Cmt.
Laptite Cement
Fireite Furnace Cmt.
Heat Treating Cement
Fibrous Adhesive
302 Cement
352 Cement
301 Cement
450 Cement
500 Cement
85% Magnesia Cmt.
Asbestoment
MX-3808 Asb. Filler
Navy 450 Cement
300 E Cement
Thermomix 700
Thermomix 720
Thermomix 770

Sealing Cpds.

Albaseal
Duxseal
Body Sealer
Tranolseal
Uniseal
Industrial Vent Caulking
Type T Nodrseal
Nodrseal
Branchtite
H-Navaseal

CROCIDOLITE

Cements

Thermomix 810

MAGNESIUM HYDROXIDE FIBER

Cements

Thermomix 390

UNKNOWN (PROBABLY CHRYSOTILE

Pipe

Asbestocel (aircell)
Anti-Sweat

Paper, Felt, Blkt

Asbestos Fire Felt
Asbesto-Sponge Felt
Pan-O-Cel
Super Fire Felt
Thermo Fire Felt
Vitribestos
Vitro Fire Felt
Asbestos Pipe Blkt
Engineers Insulating Tape
Asbestos Jelly Rolls
White Surface Asb. Jkt.
Thermomat
Thermowrap
Thermotape

Board

Submarine Bulkhead

Sealing Cpd.

Stove Putty

Unknown

Cellamite
Sigma-K

Cements

Fil-Insul.
300 Cement
319 Semi-Refractory Cement
678 Simi-Refractory Cement
304 Cement
340 Cement
0352 Cement
400 Cement
364 Cement
Asbestile Cement
FibroFil

NOTE: Trade Names are underlined.

AMOSITE

Block

85% Magnesia
Superex-M
Superex-1900
Thermobestos
Superex-SG
Min-K 500
Min-K 1301
Min-K 2000
Sonite

Pipe

85% Magnesia
Superex-M
Superex 1900
Thermobestos

Paper, Felt, Blkt.

Asbestos Turbine Blkt.
High Temperature Flexible Min-K
Standard Flexible Min-K
Min-Klad

Board

Flat Transite
Marinite 23
Marinite 36
Veneered Marinite
Metal Veneered Marinite
Molten Metal Marinite
Heat Treated Molten Metal Marinite
Marinite 30
Marimet 45
Transite Core Plate
Pallite

Cements

85% Magnesia Cement
Thermobestos Cement

EXHIBIT C

LIST OF ASBESTOS-CONTAINING PRODUCTS REPLACED BY NON-ASBESTOS PRODUCTS

Asbestos Product	Non-Asbestos Product	Date Replaced
Superex M	Superex 1600	1973
Superex 1900	Superex 2000	1972
301 Cement	375 Cement	1971
450 Cement	460 Cement	1972
500 Cement	505 Cement	1972
Thermobestos	Thermo-12	1972-1973
Metal-On (Thermobestos)	Metal-On (Thermo-12	1972-1973
Molded Min-K (500, 1301, 2000)	Molded Min-K (500, 1301, 2000)	1973-1974
Flexible Min-K (High Temperature & Standard	Flexible Min-K (HIgh Temperature & Standard)	1973-1974
Sonite	Sonite	1973-1974

EXHIBIT D

Manufacturing locations of Johns-Manville Products Corporation (Insulation products only) until 12/31/75. After 12/31/75, merged with Johns-Manville Sales Corporation.

IPD Facility	Dates of Operation	Asbestos Products Manufactured
Johns-Manville Products Corp. P. O. Box 9067 Long Beach, CA 90810	1955-1973	Thermobestos Thermobestos Insulating Metal-On Cement
Johns-Manville Products Corp. High Street North Billerica, Mass. 01862	1940-Present	Marinite 23 Veneered Marinite Imperial Marinite Heat Treated Molten Metal Marinite Asbestocite Marinite 36 Metal Veneered Marinite Molten Metal Marinite Marimet 45 Marinite 65 Reeferite Marinite 30 Pallite
Johns-Manville Products Corp. Main Street Manville, N.J. 08835	1913-Present	Aertite Insulkote ET Body Sealer Industrial Vent Caulking Branchtite Min-K 500 Asbestos Turbine Blanket Min-Klad Insulkote SG Albaseal Tranolseal Type T Nodrseal H-Navaseal Min-K 1301 High Temp. Flexible Min-K Microbestos Insulkote ST Duxseal Uniseal Nodrseal HF Navaseal Min-K 2000 Standard Flexible Min Laptite 85% Magnesia Silicated Thermobestos D.C. Flexstone Commercial Grade Asbestos Paper Long Fiber Asbestos Paper Doublex Asbestos Paper 12 lb. Asbestos Tape Miscellaneous Asbestos Jackets Thermobestos Asbestos Roll Fire Felt Asbestos Firetard Fibroid Asbestos Paper High Strength Fibroid Asbestos Paper Armaturo Asbestos Paper 15A Asbestos Jacket

IPD Facility	Dates of Operation	Asbestos Products Manufactured
		Ceilinite #50 Weatherproofing Pape Welding Paper Niagrite Non-Burn Asbestos Paper 45A Asbestos Jacket Sonite
Johns-Manville Products Corp. Tilton, N.J. 03276	1948-Present	Microbestos
Johns-Manville Products Corp. P. O. Box 55 Waukegan, Ill. 60085	1923-Present	85% Magnesia Superex-SG 106 Asbestos Millboard XXX Asbestos Millboard A Asbestos Millboard Superex Cement 302 Cement 450 Cement Asbestoment 300 E Cement 319 Semi-Refractory Ceme 340 Cement 364 Cement Non-Burn Asbestos Paper Superex-M Superex 2000 C Asbestos Millboard 106B Asbestos Millboard Commercial Grade Asbesto Paper Laptite Cement 352 Cement 500 Cement MX-3808 Asbestos Filler Fil-Insul 678 Semi-Refractory Ceme 0352 Cement Asbestile Cement Welding Paper Superex-1900 102 Asbestos Millboard 219 Asbestos Millboard 106H Asbestos Millboard Fibroid Asbestos Paper Fibrous Adhesive 301 Cement 85% Magnesia Cement Navy 450 Cement 300 Cement 304 Cement 400 Cement Fibrofil
Johns-Manville Products Corp. Zelienople, Pa.	1943-1973	Fireite Furnace Cement Heat Treating Cement
*Johns-Manville Products Corp. 40 Bridge Street Nashua, N.H.	1907-Present	Flexboard Dekeran Marine Acoustical Unit Flat Transite Transite Core Plate Transite Acoustical Pane Marine Veneer

IPD Facility	Dates of Operation	Asbestos Products Manufactured
*Johns-Manville Products Corp. P. O. Box 591 Pittsburg, CA 94565	1923-Present	#15 Waterproofing Felt #15 Finishing Felt Coated Asbestos Base Felt #55 Asbestos Base Felt Asbestos Base Flashing Asbestile Aertite Coating Insulkote ST Insulkote SG Insulkote ET Pipe Covering - Asbestos Paper Commercial Asbestos Paper 6# 8# 10# 12# 16# 32# Rollboard

*Not currently IPD plant, however some IPD products were manufactured.

I HEREBY CERTIFY that a true copy of the foregoing was this 19th day of March, 1976 mailed to the following attorneys of record:

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By: _____