

FILE NAME: BF Goodrich (BFG)

DATE: 2002

DOC#: BFG055

DOCUMENT DESCRIPTION: Legal - Defendant's Responses to Interrogatories

Subject: Goodrich

From: Michael Shepard <msheward@shepardlawfirm.com>

Date: Wed, 23 Apr 2008 17:49:14 -0400

To: "Barry Castleman (barry.castleman@gmail.com)" <barry.castleman@gmail.com>

Barry,

Here is some Goodrich discovery from Rhode Island. Attached as Exhibit F to the discovery answers is a list of publications to which Goodrich subscribed. Attached as Exhibit A is a list of medical employees of Goodrich over the years. I hope this helps your research project.

Best regards,

Mike

1 WILLIAM G. HOBACK, ESQ., Bar No:088655
JOSEPH J. MINIOZA, ESQ., Bar No. 197379
2 VANESSA JARVIS, ESQ., Bar No. 201585
CHASTINE A. FISH, ESQ., Bar No. 206663
3 ERICKSEN, ARBUTHNOT, KILDUFF, DAY & LINDSTROM, INC.
530 Water Street, Suite 720
4 Oakland, CA 94607
(510) 832-7770

5 Attorneys for Defendant,
6 GOODRICH CORPORATION

RECEIVED

FEB 25 2002

DAF
KAZAN, McCLAIN, EDISES, ABRAMS,
FERNANDEZ, EVONS & FARRISE

10 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

11 UNLIMITED JURISDICTION

12 IN RE:) No.: 828684
13)
14) DEFENDANT GOODRICH
COMPLEX ASBESTOS LITIGATION) CORPORATION'S RESPONSES TO
15) GENERAL ORDER NO. 129
16) INTERROGATORIES

17 COMES NOW, the defendant, GOODRICH CORPORATION, and pursuant to San
18 Francisco Superior Court General Order No. 129, answers the interrogatories propounded to
19 it as follows.

20
21 Defendant and its attorneys have not completed their discovery or preparation for
22 trial, nor have they completed their analysis or review of the investigation and other trial
23 preparation matters and subjects obtained conducted to date. These answers, therefore, state
24 the present information and analysis of the defendant and its attorneys as acquired and
25 reviewed to date, without prejudice and to defendant's right to present additional facts,
26 contentions or theories at the trial based on information evidence or analysis hereinafter
27 obtained or evaluated. The following answers state the information, facts, evidence, and
28

1 contentions presently known to and evaluated by defendants and its attorneys. The following
2 answers at this time are preliminary only in light of the severe time constraints placed upon
3 defendant by plaintiffs in responding to these detailed interrogatories which seek information
4 from many sources over one hundred years. These answers to interrogatories are an ongoing
5 project and most likely will change as more information is discovered and reviewed. Over
6 the years this defendant has acquired a number of smaller companies whose product lines
7 may have discontinued many years ago. The information regarding those prior products,
8 from years past, is limited if not totally non-existent. Defendant and its attorneys are
9 attempting to go back in time through various avenues to obtain as much information as is
10 possible. As that information comes to light, these answers will then be supplemented and
11 modified accordingly. Therefore, these answers should not, and cannot, be construed as final
12 or complete answers to any of the questions posed.

13
14
15 **RESPONSE TO INTERROGATORY NO. 1:**

16
17 Jerry A. Smith, consultant to the Goodrich Corporation, c/o Canal Place Ltd. 520
18 South Main Street, Suite 2511, Akron, Ohio 44331-1010.

19 **RESPONSE TO INTERROGATORY NO. 2:**

20 Objection. Defendant objects on the grounds that this interrogatory is overly broad,
21 unduly burdensome and irrelevant to any issue in this case not reasonably calculated to lead
22 to discovery of admissible evidence. Notwithstanding this objection, Defendant answers as
23 follows: Mr. Smith began his employment with the Goodrich Corporation on January 15,
24 1959. He held clerical position in the mail and telecommunication department s until 1964.
25 From 1964 to 1974, Mr. Smith held supervisory and management position in the
26 telecommunications department. In 1974, he was appointed director, MIS
27
28

1 Telecommunications. In 1981, Mr. Smith was appointed director of Administration and
2 Information Services Support and in 1982 was appointed director of Administrative Services.
3 Mr. Smith retired from the Goodrich Corporation on February 1, 1990. He has been a
4 consultant for Goodrich since February 1, 1990.
5

6 **RESPONSE TO INTERROGATORY NO. 3:**

7 Yes.

8 A) Goodrich Corporation;

9 B) New York;

10 C) May 2, 1912;

11 D) Four Coliseum Centre, 2730 West Tyvola Road, Charlotte, North Carolina 28217;

12 E) Yes. August 1, 1934 to date;

13 F) Not applicable.

14 G) There are several Goodrich plants located in California. Goodrich Corporation's
15 principal place of business is Four Coliseum Centre, 2730 West Tyvola Road, Charlotte,
16 North Carolina 28217
17
18

19 **RESPONSE TO INTERROGATORY NO. 4:**

20 Yes.

21 **RESPONSE TO INTERROGATORY NO. 5:**

22
23 Goodrich started in 1879 when it formed the partnership of Goodrich, Tew & Co. In
24 1874, the partnership changed to the name B.F. Goodrich & Co. On May 10, 1880, B.F.
25 Goodrich transformed the partnership into an Ohio-chartered corporation until such time that
26 it was reincorporated as a New York business on May 2, 1912. The company name had
27 remained the same until June 1, 2001, when it changed its name to Goodrich Corporation.
28

1 **RESPONSE TO INTERROGATORY NO. 6:**

2 Not applicable.

3 **RESPONSE TO INTERROGATORY NO. 7:**

4 Not applicable.

5 **RESPONSE TO INTERROGATORY NO. 8:**

6 Not applicable.

7 **RESPONSE TO INTERROGATORY NO. 9:**

8 Mr. Smith, previously identified in interrogatories 1 and 2, has access to relevant
9 business records at the company.

10 **RESPONSE TO INTERROGATORY NO. 10:**

11 Defendant is unable to fully and completely respond to this interrogatory at this time
12 as no available dates have been forth encompassing the requested period for information and
13 defendant's investigation and discovery have not yet been completed. However, based on
14 information available to date, defendant responds as follows:

15 A. Goodrich Corporation has no current employee with this knowledge, however,
16 Mr. Smith, previously identified has researched and is familiar with this subject.

17 B. With respect to certain aircraft brake products designed, manufactured and sold by
18 the company, Roland E. Cecil, Supervisor Configuration Control with the Goodrich
19 Aerospace Landing Systems, in Troy, Ohio. Mr. Cecil has worked for the Goodrich
20 Corporation since 1958.

21 C. Not applicable. Discovery is continuing.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Goodrich object to this interrogatory on the ground that it is overly broad, unduly
24 burdensome, irrelevant to any issue in this case and not reasonably calculated to lead to

1 discovery of admissible evidence. To require Goodrich to identify the medical directors,
2 industrial hygienists and physicians it has employed over the years constitutes a request for
3 masses of irrelevant information, is unduly burdensome and beyond the scope of permissible
4 discovery. Without waiving said objection, defendant responds as follows: Defendant is
5 unable to fully and completely respond to this interrogatory at this time as discovery and
6 investigation are continuing. However, based upon available discovery which has been done
7 to date, defendant responds as follows: for the period 1930 to 1985, the following
8 physicians, medical directors and/or industrial hygienist were employed by the Goodrich
9 Corporation set forth in Exhibit A attached.

10 **RESPONSE TO INTERROGATORY NO. 12:**

11 Yes. Please see listing of those employees who have given testimony while
12 employed by Goodrich which is attached hereto as Exhibit B. .

13 **RESPONSE TO INTERROGATORY NO. 13:**

14 Goodrich objects to this interrogatory as being overly broad, unduly and unreasonably
15 burdensome and oppressive and not calculated to lead to the discovery of admissible
16 evidence in that this interrogatory requests information readily accessible to plaintiff from
17 sources other than this defendant. Moreover, Goodrich Corporation never engaged in the
18 marketing of any raw asbestos. Without waiving said objections, Goodrich has, at times,
19 belonged to the Industrial Hygiene Foundation and/or Industrial Health Foundation, the
20 National Safety Council, the American Industrial Hygienists and Resilient Floor Covering
21 Institute) or any other name in which it has existed).

22 **RESPONSE TO INTERROGATORY NO. 14:**

23 American Industrial Hygiene Association

24 A. 1975 to the present; personal membership; never a corporate membership.

25 B. AIHA Journal.

1 C. To our knowledge, none.

2 National Safety Council.

3 A. 1975 to the present; personal membership; never a corporate membership.

4 B. Unknown; discovery is continuing;

5 C. None, based upon this defendant's current corporate knowledge.

6 American Industrial Hygienists\

7 A. Unknown.

8 B. Unknown.

9 C. Unknown

10 Resilient Floor Covering Institute.

11 A. Unknown.

12 C. Unknown.

13 C. Unknown

14 **RESPONSE TO INTERROGATORY NO. 15:**

15 No, based upon this defendant's current corporate knowledge.

16 **RESPONSE TO INTERROGATORY NO. 16:**

17 No, based upon this defendant's current corporate knowledge.

18 **RESPONSE TO INTERROGATORY NO. 17:**

19 No. based upon this defendant's current corporate knowledge.

20 **RESPONSE TO INTERROGATORY NO. 18:**

21 Goodrich objects to this request on the grounds that it is overly broad and
22 burdensome and that it seeks information not relevant to the subject matter of the information
23 not relevant to the subject matter of the litigation and which is not likely to lead to admissible
24

1 evidence, in that not all such libraries and/or collection of books and publications would have
2 any relevance to the case at bar

3 Notwithstanding the foregoing and without waiving any applicable objections,
4
5 Goodrich has maintained several libraries since the Company was formed in 1870, each with
6 many collections of books and publications. Certain Company libraries, which may have
7 been in existence since 1920, have been closed. Certain company libraries may have been
8 closed or sold along with other various business entities.

9 **RESPONSE TO INTERROGATORY NO. 19:**

10
11 No, based upon this defendant's current corporate knowledge.

12 **RESPONSE TO INTERROGATORY NO. 20:**

13 No, based upon this defendant's current corporate knowledge.

14 **RESPONSE TO INTERROGATORY NO. 21:**

15 Defendant believes the answer is yes based on current corporate knowledge.

16
17 A. 500 South Main Street, Akron, Ohio; and Marion, Ohio, both of which were
18 shut down quite sometime ago.

19 B. Accordingly, documents responsive to this interrogatory, if any exist, can be
20 made available for inspection at defendant's offices where the documents are kept, at a mutual
21 convenient time during regular business hours. Defendant has not done a separate
22 compilation of the information requested and any such information would exist in any
23 remaining existing documents from these locations.

24
25 C. Accordingly, documents responsive to this interrogatory, if any exist, can be
26 made available for inspection at defendant's offices where the documents are kept, at a mutual
27 convenient time during regular business hours. Defendant has not done a separate
28

1 compilation of the information requested and any such information would exist in any
2 remaining existing documents from these locations.

3 D. Accordingly, documents responsive to this interrogatory, if any exist, can be
4 made available for inspection at defendant's offices where the documents are kept, at a mutual
5 convenient time during regular business hours. Defendant has not done a separate
6 compilation of the information requested and any such information would exist in any
7 remaining existing documents from these locations.

8
9 E. Accordingly, documents responsive to this interrogatory, if any exist, can be
10 made available for inspection at defendant's offices where the documents are kept, at a mutual
11 convenient time during regular business hours. Defendant has not done a separate
12 compilation of the information requested and any such information would exist in any
13 remaining existing documents from these locations.

14
15 **RESPONSE TO INTERROGATORY NO. 22:**

16
17 No, based upon this defendant's current corporate knowledge.

18 **RESPONSE TO INTERROGATORY NO. 23:**

19 Defendant is not aware of any such tests or studies at this time, however, discovery is
20 continuing.

21
22 **RESPONSE TO INTERROGATORY NO. 24:**

23 Yes.

24 A. Yes.

25 B. See copy of the Goodrich policy OHP001.3.10, **Exhibit D.**

26 C. See copy of the Goodrich policy OHP001.3.10, **Exhibit D.**

27 D. Dr. Ray Bernea. (No longer employed by Goodrich)
28

1 **RESPONSE TO INTERROGATORY NO. 25:**

2 Goodrich objects to this interrogatory on the grounds that the information sought is
3 irrelevant in this case and is not reasonably calculated to lead to discovery of admissible
4 evidence. The plaintiff has never been a Goodrich employee and does not allege ever
5 visiting any Goodrich facility. Notwithstanding this objection and without waiving any
6 applicable objections, the defendant responds as follows: No, based upon this defendant's
7 current corporate knowledge.
8

9 **RESPONSE TO INTERROGATORY NO. 26:**

10 See attached listing of liability insurance carriers that is attached hereto as **Exhibit C**.
11

12 **RESPONSE TO INTERROGATORY NO. 27:**

13 No, based upon this defendant's current corporate knowledge.
14

15 **RESPONSE TO INTERROGATORY NO. 28:**

16 No, based upon this defendant's current corporate knowledge.
17

18 **RESPONSE TO INTERROGATORY NO. 29:**

19 Not applicable.
20

21 **RESPONSE TO INTERROGATORY NO. 30:**

22 Yes.

23 A. Yes, based on available records from 1939 to 1985

24 B. No, based upon this defendant's current corporate knowledge.

25 C. See subpart A above.

26 D. See subpart A above.

27 E. See subpart A above.

28 F. Unknown.

1 G. See subpart A above.

2 H. No, based upon this defendant's current corporate knowledge.

3 Discovery is continuing.

4
5 **RESPONSE TO INTERROGATORY NO. 31:**

6 Defendant is unable to fully and completely respond to this information because of
7 the extensive time period to which these interrogatories pertain. Only limited information is
8 still available. Notwithstanding this difficulty and without waiving any applicable objections
9 and the fact that investigation and discovery are still continuing, defendant responds as
10 follows: See Exhibit E attached.

11
12 **RESPONSE TO INTERROGATORY NO. 32 (PREMISES DEFENDANTS only)**

13 Not applicable.

14 **RESPONSE TO INTERROGATORY NO. 33 (CONTRACTOR DEFENDANTS only):**

15 Not applicable.

16
17 **RESPONSE TO INTERROGATORY NO. 34:**

18 Goodrich Corporation has never manufactured or distributed any raw asbestos. With
19 respect to exclusive distributorship, defendant responds as follows: No, based upon this
20 defendant's current corporate knowledge.

21
22 **RESPONSE TO INTERROGATORY NO. 35:**

23 From approximately 1955 to 1976, Goodrich Corporation manufactured an asbestos-
24 containing adhesive known as "R-907-T" and "permate" and placed the adhesives in drums
25 and pails for Lexsuco, Inc. with "Lexsuco" labels. The products were not rebranded per se.
26 Lexsuco, Inc. purchased the adhesives from Goodrich and Goodrich packaged the adhesives
27
28

1 in drum and pails bearing the name "Lexsuco." Lexsuco became part of Goodrich
2 Corporation in 1976.

3 **RESPONSE TO INTERROGATORY NO. 36:**

4 Not applicable.

5
6 **RESPONSE TO INTERROGATORY NO. 37:**

7 To the best of defendant's knowledge and believe, no.

8 **RESPONSE TO INTERROGATORY NO. 38:**

9 Goodrich objects to this interrogatory for the reason that the only products at issue in
10 this case are those to which plaintiff alleges to have been exposed. To require Goodrich to
11 identify any logo, design, marking or printing for every product it has sold and/or distributed
12 over the years constitutes a request for masses of irrelevant information, is unduly
13 burdensome and beyond the scope of permissible discovery.

14
15 Notwithstanding this objection, defendant responds as follows: Goodrich's name,
16 trade name and/or logo may have appeared on certain asbestos-containing sheet rubber and
17 hose products.

18
19 **RESPONSE TO INTERROGATORY NO. 39:**

20 Defendant is unable to fully and completely respond to this interrogatory as discovery
21 is continuing. However, based upon discovery to date, responding party answers in
22 approximately the 1940's defendant acquired an asbestos containing asphalt floor tile product
23 from Hood Rubber in Watertown, Massachusetts. Additional information is no longer
24 available.

25
26 **RESPONSE TO INTERROGATORY NO. 40:**

27 No, based upon this defendant's current corporate knowledge.
28

1 **RESPONSE TO INTERROGATORY NO. 41:**

2 Goodrich Corporation has never manufactured, sold, or distributed raw asbestos
3 material. With respect to asbestos-containing products listing in Exhibit E, various
4 documents currently exist but generally consist of catalog listing, advertising, price list, etc.
5 The printing dates vary. See Exhibit E for information concerning location and the
6 custodian of records.
7

8 In addition, any answer to this interrogatory would require a compilation of
9 documents which do not exist. It would not be substantially less expensive for responding
10 party to make this compilation than it would be for the party propounding the interrogatories
11 to do so. Accordingly, the documents responsive to this interrogatory that have been located
12 can be made available at the corporate office of the Goodrich Corporation.
13

14 **RESPONSE TO INTERROGATORY NO. 42:**

15 No, based upon this defendant's current corporate knowledge.
16

17 **RESPONSE TO INTERROGATORY NO. 43:**

18 No. Subparts (A) through (D) are not applicable.
19

20 **RESPONSE TO INTERROGATORY NO. 44:**

21 Goodrich has in its Industrial Hygiene Library some publications which suggest a
22 relationship between asbestos exposure and asbestos dated in the 1930s. An awareness of a
23 possible relationship between asbestos exposure and the occurrence of mesothelioma and
24 some lung cancers existed in the Industrial Hygiene Department since 1976, but defendants
25 do not know when the awareness may have existed prior to 1976.
26

27 ////

28 ////

1 **RESPONSE TO INTERROGATORY NO. 45:**

2 Goodrich had in its library publications about the relationship of disease to exposure
3 to asbestos.

4 **RESPONSE TO INTERROGATORY NO. 46:**

5 See the list of publications from defendant's Industrial Hygiene Library, attached
6 hereto as Exhibit F.

7 **RESPONSE TO INTERROGATORY NO. 47:**

8 Defendants have been unable to locate any documents regarding when Goodrich
9 Corporation first warned its employees that exposure to asbestos could be hazardous to
10 human health, however, it is believed that subsequent to the regulations issued following the
11 institution of OSHA, Goodrich Corporation complied.

12 **RESPONSE TO INTERROGATORY NO. 48:**

13 Goodrich objects to this interrogatory on the grounds that the information sought is
14 irrelevant in this case and is not reasonably calculated to lead to discovery of admissible
15 evidence. The plaintiff has never been a Goodrich employee and does not allege ever visiting
16 any Goodrich facility. Notwithstanding this objection, defendant responds as follows: No,
17 based on this defendant's current corporate knowledge.

18 **RESPONSE TO INTERROGATORY NO. 49:**

19 No, based upon this defendant's current corporate knowledge.

20 **RESPONSE TO INTERROGATORY NO. 50:**

21 No, based upon this defendant's current corporate knowledge.

22 **RESPONSE TO INTERROGATORY NO. 51:**

23 Not applicable.

24 ///

1 RESPONSE TO INTERROGATORY NO. 52:

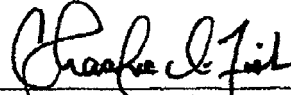
2 Not applicable.

3 RESPONSE TO INTERROGATORY NO. 53:

4 No, based upon this defendant's current corporate knowledge.

6 DATED: February 21, 2002

7 ERICKSEN, ARBUTHNOT, KILDUFF, DAY
& LINDSTROM, INC.

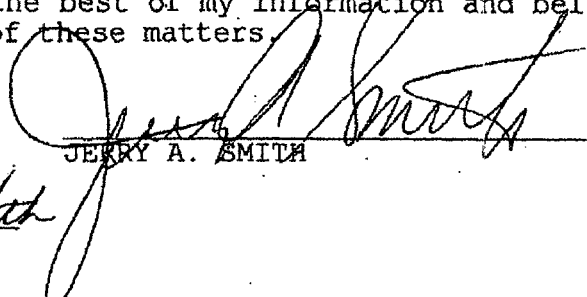
8 

9 WILLIAM G. HOBACK
10 CHASTINE A. FISH

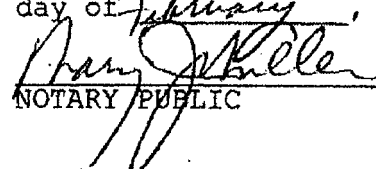
VERIFICATION

STATE OF OHIO
COUNTY OF SUMMIT

I hereby certify that I am authorized to respond to Plaintiff's Interrogatories, on behalf of Goodrich Corporation, in my capacity as Consultant ~ Special Projects, and that to the extent that I am personally familiar with the information set forth in these answers, I certify that the answers are correct, and to the extent that I am not personally familiar with the information provided in the said answers, I certify that the information is correct to the best of my information and belief based on my investigation of these matters.


JERRY A. SMITH

Sworn to before me this 14th
day of February, 2002.


NOTARY PUBLIC

MARY J. MILLER, NOTARY PUBLIC
RESIDENCE-WAYNE COUNTY
STATEWIDE JURISDICTION, OHIO
MY COMMISSION EXPIRES FEB. 9, 2005

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Plaintiff Attorney Service List

Firm Name	Street Address	City	State	Zipcode
Berry & Berry	P.O. Box 16070	Oakland	CA	94610
Brayton & Purcell	222 Rush landing Road	Novato	CA	94945
Clapper & Patti	2330 Marinship Way, Ste. 140	Sausalito	CA	94965
Hobin & Shingler	1011 A Street	Antioch	CA	94509
Kazan, McClain, Edises, et al.	171 - 12th Street, 3rd Floor	Oakland	CA	94607
Law Office of Bruce Ahnfeldt	P.O. Box 6078	Napa	CA	94581
Law Offices of Christopher E. Grell	360 - 22nd Street, Suite 320	Oakland	CA	94105
Paul & Hanley	4905 Central Avenue, Ste. 200	Richmond	CA	94804
Visse & Yanez	1375 Sutter Street, Ste. 120	San Francisco	CA	94109
Wartnick, Chaber, et al.	101 California Street, 22nd Floor	San Francisco	CA	94111

Akron Plant - Medical Center -- Full time employees as far as we know, unless noted

Dr. Rex H. Wilson	Medical Director SD 6/1/46 - 5/1/74, retired, deceased
Dr. Arnold V. Gold	Medical Director, SD 9/1/66 - 11/1/77, retired, deceased
Dr. Richard A. Guyton	Staff VP, Health & Env. Services, SD 1/2/74 - 7/31/88, retired
Dr. Maurice N. Johnson	Director of Toxicology, SD 4/6/72 - 5/31/85, retired (UGTC list), deceased April 1999
Dr. Harold W. Dietz	Director of Health & Env. Services 10/18/76 - 1991. Retired
Dr. Charles T. Disney	Asst. Dir. of Env. Health, 7/15/74 - 2/17/75, retired, deceased.
Dr. Harold E. May	Dir. of Medical Services (Medical Center) - 6/10/74 - 1/1/87, retired
Dr. Charles Wintrup	Medical Center Staff Physician, SD 5/22/67 - 2/25/72, terminated, deceased.
Dr. Carolyn McCann	Medical Center Staff Physician, 5/9/77 - 5/31/86 - term.
Dr. Edson Freeman	Medical Center Staff Physician, 7/10/73 - 12/31/80, term.
Dr. John Spillane	Medical Center Staff Physician, dates of service unknown, deceased.
Dr. D. B. Lowe	Medical Director 193?-1946, retired 1946, deceased.
Dr. F. R. Stees	Medical Center Staff Physician, dates of service unknown, approx. 1945 - deceased.
Dr. J. H. Pollock	Medical Center Staff Physician, approx. 1955
Dr. Glenn Hough	Medical Center Staff Physician, dates unknown, status unknown but believed deceased.
Dr. George Donnelly	Medical Center Staff Physician, 4/1/55 - 5/1/62, deceased.
Dr. Ernest H. Planck II	Medical Center Staff Physician, 4/16/54 - 3/1/67, retired, deceased.

EXHIBIT A

Dr. Harold Reed	Medical Center Staff Physician, 5/3/54 - 3/1/67, retired, deceased.
Dr. I. R. Birnbaum	Medical Center Staff Physician, early 70's, deceased. (fee for service arrangement)
Dr. Zadinsky	Medical Center Staff Physician, early 60's, status unknown but believed to be deceased.
Dr. Ralph W. Jacobs	Medical Center Staff Physician, was around in 1954, status unknown.

Physicians - Akron Plant Dispensary - none were full time, all worked on a fee for services basis. The dispensary was opened July 1980 and closed September 1987.

Robert G. Scacella, MD	Private practice, Akron
Samir Abdo, MD	Left Akron area, early 80's.
John A. Pfeiffer, MD	Left Akron area
David L. Yontz, MD	Deceased 10/22/94
Alan Henson, MD	Orthopedic specialist, current location unknown
Philip Wilcox, MD	Private practice, Akron
Thomas Naumoff, MD	Private practice, Medina
Jerry Tardio, MD	Family Medicine, current location unknown

Radiologists (Akron Medical Center)

Not full time employees, hired on a retainer or fee for service basis.

Thomas Oakley, M.D. in private practice

Richard Hirsch, M.D. on staff of Akron City Hospital

Robert Hamor, M.D. on staff of Akron City Hospital

Carroll Tatum, M.D. 1960's, deceased

Ben F. Suffron, M.D. 1970's, deceased

List of BFG Industrial Hygienists and other environmental personnel

W. E. McCormick	Director of Ind. Hyg. & Tox., SD 1946 - 1973
George Wilson	Industrial Hygienist, Term. 1968?
Tom Bialke	Industrial Hygienist, Term. 1989
Tom Shepler	Industrial Hygienist, Term. date unknown
Bob Nash	Industrial Hygienist, Term. date unknown
Mark Kennedy	Industrial Hygienist, Term. date unknown
Betty Hodgson	Industrial Hygienist, Term. from UGTC 1985
Bob Modrell	Industrial Hygienist, Retired 1989
Ed Katzenmeyer	Industrial Hygienist, Term. from UGTC 1988
John Born	Chemist, Special Assignment in Akron 1971-1974 Retired from Brecksville 1989
John McCool	(title?) Retired UGTC 1982
Charles T. Disney, MD	Asst. Dir. Env. Health, 1974-1975 (deceased)
Richard G. Carter	Industrial Hygienist, late 60's
Ronald Callender	Industrial Hygienist, late 60's

TESTIMONY OF GOODRICH EMPLOYEES

NAME OF DEPONENT	CASE NAME	COURT	DOCKET NO.	DATE OF TESTIMONY
Jerry A. Smith	The Mayor and City Council of Baltimore v. Keene Corp.	Circuit Court Baltimore City, MD	84268068/CL25639	4/27/93
Jerry A. Smith	Hartford Fire Insurance Co. v. Westinghouse Electric Corp.	District Court Hennepin County, MN	87-14006	5/13/93
Dohrman Wells	City of Baltimore v. BFGoodrich Co.	Circuit Court Baltimore City, MD	84268068 CL25639	9/21/93
Keith Banke	City of Baltimore v. BFGoodrich Co.	Circuit Court Baltimore City, MD	84268068 CL25639	9/21/93
Jerry A. Smith	City of Baltimore v. BFGoodrich Co.	Circuit Court Baltimore City, MD	84268068 CL25639	6/7/93
Marilyn Petroski	City of Baltimore v. BFGoodrich Co.	Circuit Court Baltimore City, MD	84268068 CL25639	9/21/93
Jerry A. Smith	Mike Norman v. A-C Product Liability Trust	Circuit Court Wayne County, MI	94421061NP	12/20/95
Jerry A. Smith	Mon Mass II	Circuit Court Monongalia County, WI		6/17/97
Jerry A. Smith	Goldberg Groups 5, 6 & 7	Court of Common Pleas Cuyahoga County, OH	286145-014	5/10/99
Jerry A. Smith	Rickey A. Lanier v. Eastern Refractories Company, Inc.	Superior Court Middlesex County, MA	00-0066	3/21/01

INSURANCE INDEX
10/29/93

INSURER	POLICY PERIOD FROM	TO	POLICY NUMBER

BFGoodrich Policies up to \$20M			
AMERICAN MOTORISTS INSURANCE CO.	1/1/44	1/1/63	*Unknown
LLOYDS	1/1/55	11/6/56	*Unknown
LLOYDS	1/1/55	11/6/56	*Unknown
LLOYDS	1/1/55	11/6/56	*U45508
LLOYDS	1/1/55	11/6/56	*U45508
LLOYDS	1/1/55	11/6/56	*U45558
LLOYDS	1/1/55	11/6/56	*U50514
LLOYDS	11/6/56	1/1/60	*Unknown
LLOYDS	11/6/56	1/1/60	*U62302
LLOYDS	11/6/56	1/1/60	*U62354
LLOYDS	11/6/56	1/1/60	*U62353
LLOYDS	1/1/60	1/1/63	*U78658
LLOYDS	1/1/60	1/1/63	*U78658
LLOYDS	1/1/60	1/1/63	*U78657
LLOYDS	1/1/60	1/1/63	*U78660
EMPLOYERS REINSURANCE CORP.	1/1/60	10/13/61	PLE-128
EMPLOYERS REINSURANCE CORP.	10/3/61	1/1/63	PLE-128
GENERAL REINSURANCE CORP.	8/8/62	1/1/63	*Unknown
EMPLOYERS REINSURANCE CORP.	8/8/62	1/1/63	PLE-224
AMERICAN MOTORISTS INSURANCE CO.	1/1/63	1/1/64	3YM 113 800
AMERICAN MOTORISTS INSURANCE CO.	1/1/64	1/1/69	3YM 113 800
AMERICAN MOTORISTS INSURANCE CO.	1/1/69	11/12/75	9YM 113 800
AMERICAN BANKERS INS.CO. OF FLA.	11/12/75	1/1/77	XL 345 1150
LONDON	11/12/75	1/1/77	614 NC 1050
STONEWALL INSURANCE CO.	11/12/75	1/1/77	35000443
INSURANCE CO. STATE OF PA.	11/12/75	1/1/77	4176-6735
LONDON	11/12/75	1/1/77	614 NC 1051
NORTHBROOK INSURANCE CO.	11/12/75	1/1/77	63 001 415
STONEWALL INSURANCE CO.	11/12/75	1/1/79	35000444
AMERICAN REINSURANCE CO.	11/12/75	1/1/77	M1029862
I.S.L.I.C.	1/1/77	1/1/78	GP 2217
SEGUROS LA REPUBLICA SA	1/1/77	1/1/78	XL01-0031
LONDON	1/1/77	1/1/79	614 NC 1050
DRAKE INS. CO. OF NEW YORK	1/1/77	10/1/77	XL 01521
INSURANCE CO. STATE OF PA.	1/1/77	1/1/79	4176-6735
LONDON	1/1/77	1/1/79	614 NC 2917
NORTHBROOK INSURANCE CO.	1/1/77	1/1/79	63 001 415
LONDON	10/1/77	1/1/78	*Unknown
I.S.L.I.C.	1/1/78	1/1/79	GP 2662
AVRECO/SEGURUS LA REPUBLICA	1/1/78	6/1/78	XL 01-0121
LONDON	1/1/78	1/1/79	614 NC 1051
HIGHLANDS INSURANCE CO.	1/1/78	1/1/79	SRNO 40321
AMERICAN CENTENNIAL	6/1/78	1/1/79	XC-00-00-17
AMERICAN CENTENNIAL	1/1/79	7/1/79	XC000046
I.S.L.I.C.	1/1/79	7/1/79	GP 50003
LONDON	1/1/79	7/1/79	614 NC 6524
LONDON	1/1/79	7/1/80	614 NC 6525
TRANSIT CASUALTY CO.	1/1/79	7/1/79	SCU 955-032

EXHIBIT C

TYPE	LIMIT	LAYER	EXCESS OF:
CGL	1,000,000	1,000,000	
UMB	50,000 (PD)	50,000	
UMB	1,000,000 (GL)	1,000,000	
XS	1,000,000 (GL)	1,000,000	
XS	500,000 (PD)	500,000	50,000
XS	450,000 (PD)	450,000	550,000
XS	1,000,000	1,000,000	2,000,000
UMB	100,000	100,000	1,000,000
XS	500,000	500,000	500,000
XS	400,000	400,000	1,000,000
XS	1,000,000	1,000,000	1,000,000
UMB	100,000	100,000	1,000,000
XS	500,000	500,000	500,000
XS	400,000	400,000	1,000,000
XS	1,000,000	1,000,000	1,000,000
XS	1,000,000	1,000,000	2,000,000
XS	2,000,000	2,000,000	2,000,000
XS	2,000,000	2,000,000	4,000,000
XS	4,000,000	4,000,000	6,000,000
CGL/UM	11,000,000	11,000,000	
CGL/UM	20,000,000	20,000,000	
CGL/UM	20,000,000	20,000,000	
UMB	500,000	5,000,000	SIR
UMB	3,000,000	5,000,000	SIR
UMB	1,500,000	5,000,000	SIR
XS	1,000,000	14,000,000	5,000,000
XS	1,890,000	14,000,000	5,000,000
XS	4,500,000	14,000,000	5,000,000
XS	3,000,000	14,000,000	5,000,000
XS	3,610,000	14,000,000	5,000,000
UMB	250,000	5,000,000	SIR
UMB	1,000,000	5,000,000	SIR
UMB	3,750,000	5,000,000	SIR
XS	450,000	14,000,000	5,000,000
XS	2,100,000	14,000,000	5,000,000
XS	2,800,000	14,000,000	5,000,000
XS	5,040,000	14,000,000	5,000,000
XS	450,000	14,000,000	5,000,000
UMB	250,000	5,000,000	SIR
UMB	1,000,000	5,000,000	SIR
XS	3,250,000	14,000,000	5,000,000
XS	3,610,000	14,000,000	5,000,000
UMB	1,000,000	5,000,000	SIR
UMB	1,250,000	5,000,000	SIR
UMB	250,000	5,000,000	SIR
UMB	3,500,000	5,000,000	SIR
XS	10,900,000	15,000,000	5,000,000
XS	2,000,000	15,000,000	5,000,000

INSURANCE INDEX

10/29/93

INSURER	POLICY PERIOD	
	FROM	TO
GRANITE STATE INSURANCE CO.	1/1/79	7/1/79
LONDON	7/1/79	7/1/81
I.S.L.I.C.	7/1/79	7/1/80
TRANSIT CASUALTY CO.	7/1/79	7/1/80
GRANITE STATE INSURANCE CO.	7/1/79	7/1/80
I.S.L.I.C.	7/1/80	7/1/81
LONDON	7/1/80	7/1/81
TRANSIT CASUALTY CO.	7/1/80	7/1/81
GRANITE STATE INSURANCE CO.	7/1/80	7/1/81
I.S.L.I.C.	7/1/81	7/1/83
LONDON	7/1/81	7/1/83
LONDON	7/1/81	7/1/84
LONDON	7/1/83	8/1/86
I.S.L.I.C.	7/1/83	7/1/85
LONDON	7/1/83	7/1/85
LONDON	7/1/85	8/1/86
REPUBLIC INSURANCE CO.	7/1/85	8/1/86
LONDON	7/1/85	8/1/86
SELF-INSURED	8/1/86	8/1/87
WEAVERS	8/1/86	8/1/87
ASSICURAZIONI	8/1/86	8/1/87
SELF-INSURED	8/1/86	8/1/87
WEAVERS	8/1/86	8/1/87
NY INS EXCHANGE	8/1/86	8/1/87
SELF-INSURED	8/1/86	8/1/87
WEAVERS	8/1/86	8/1/87
IIE	8/28/86	8/1/87
IIE	8/28/86	8/1/87
WEAVERS	8/1/87	8/1/88
ASSICURAZIONI	8/1/87	8/1/88
IIE	8/1/87	8/1/88
WEAVERS	8/1/87	8/1/88
TUREGUM	8/1/87	8/1/88
WEAVERS	8/1/87	8/1/88
WEAVERS	8/1/88	8/1/89
GENERALI	8/1/88	8/1/89
IIE	8/1/88	8/1/89
TUREGUM	8/1/88	8/1/89
WEAVERS	8/1/88	8/1/89
WEAVERS	8/1/89	8/1/90
TUREGUM	8/1/89	8/1/90
WEAVERS	8/1/89	8/1/90
ZURICH RE	8/1/90	8/1/91
ANGLO AMERICAN	8/1/90	8/1/91
LLOYDS	8/1/90	8/1/91
ZURICH RE	8/1/90	8/1/91
VARIOUS	8/1/90	8/1/91
ZURICH RE & ANGLO AMERICAN	8/1/91	8/1/92
ALLIANZ	8/1/92	8/1/93

POLICY NUMBER	TYPE	LIMIT	LAYER	EXCESS OF:
6679-1020	XS	2,100,000	15,000,000	5,000,000
614 NC 6524	UMB	4,750,000	5,000,000	SIR
GP 50351	UMB	250,000	5,000,000	SIR
SCU 955-237	XS	2,000,000	15,000,000	5,000,000
6679-1323	XS	2,100,000	15,000,000	5,000,000
GP 51318	UMB	250,000	5,000,000	SIR
614 NTA 158	XS	10,900,000	15,000,000	5,000,000
SCU 955 237	XS	2,000,000	15,000,000	5,000,000
6680-2329	XS	2,100,000	15,000,000	5,000,000
*GP52768	UMB	500,000	5,000,000	SIR
614 NTA 570	UMB	4,500,000	5,000,000	SIR
614 NTA 571	XS	15,000,000	15,000,000	5,000,000
614 NTB 380	UMB	4,500,000	5,000,000	SIR
GP 562 86	UMB	500,000	5,000,000	SIR
614 NTB 381	XS	15,000,000	15,000,000	5,000,000
614 NTB 380	UMB	4,100,000	5,000,000	SIR
CDU-18248	UMB	900,000	5,000,000	SIR
614 NTB 381	XS	9,525,000	15,000,000	5,000,000
N/A	UMB	875,000	5,000,000	SIR
614 NTD 418	UMB	4,125,000	5,000,000	SIR
614 NTD 419	XS	125,000	5,000,000	5,000,000
N/A	XS	875,000	5,000,000	5,000,000
614 NTD 419	XS	2,000,000	5,000,000	5,000,000
S6585/86	XS	250,000	10,000,000	10,000,000
N/A	XS	3,750,000	10,000,000	10,000,000
614 NTD 420	XS	4,000,000	10,000,000	10,000,000
DOL-06980	XS	2,000,000	5,000,000	5,000,000
DOL-06979	XS	2,000,000	10,000,000	10,000,000
977/7GA2012	UMB	5,000,000	5,000,000	SIR
977/7GA2014	XS	250,000	5,000,000	5,000,000
DOL-104115	XS	375,000	5,000,000	5,000,000
977/7GA2013	XS	4,375,000	5,000,000	5,000,000
977/7GA2015	XS	1,250,000	10,000,000	10,000,000
977/7GA2013	XS	8,750,000	10,000,000	10,000,000
977/8GA2002	UMB	5,000,000	5,000,000	SIR
977/8GA2004	XS	250,000	15,000,000	5,000,000
DOL-120540	XS	375,000	15,000,000	5,000,000
977/8GA2005	XS	1,250,000	15,000,000	5,000,000
977/8GA2003	XS	13,125,000	15,000,000	5,000,000
977/9GA2003	UMB	5,000,000	5,000,000	SIR
*9GA2004	XS	1,875,000	15,000,000	5,000,000
977/9GA2004	XS	13,125,000	15,000,000	5,000,000
977/0GA2006	UMB	3,865,000	5,000,000	SIR
	UMB	1,135,000	5,000,000	SIR
	XS	850,000	17,000,000	5,000,000
977/0GA2007	XS	8,630,000	17,000,000	5,000,000
	XS	9,520,000	17,000,000	5,000,000
977/91M1073	UMB	22,000,000	22,000,000	SIR
	UMB	4,400,000	22,000,000	SIR

INSURANCE INDEX

10/29/93

INSURER	POLICY PERIOD FROM	TO	POLICY NUMBER	TYPE	LIMIT	LAYER	EXCESS OF:
ZURICH RE	8/1/92	8/1/93	92M0777	UMB	17,600,000	22,000,000	SIR

BFGoodrich
OCCUPATIONAL HEALTH EXAMINATION PROGRAM
OCCUPATIONAL EXPOSURE TO ASBESTOS

Overview

In the United States, the Occupational Safety and Health Administration (OSHA) requires that employees who are exposed to asbestos, tremolite, anthophyllite, actinolite or a combination of these must participate in annual medical surveillance examinations (29 CFR 1910.1001 and CFR 1926.1101) if they experience any of the following exposure situations:

- exposed at or above the permissible exposure limits (PEL's) of 0.1 fiber per cubic centimeter as an 8-hour time-weighted-average (TWA) or the excursion limit (EL) of 1 fiber per cubic centimeter averaged over 30 minutes, for a combined 30 days or more per year;
- are involved in Class I, II or III asbestos work for a combined 30 days or more a year. (Note -days involving 1 hour or less in total of Class II and/or Class III work performed using the work practices specified in the OSHA standard, are not to be counted.)

This applies without regard to the employee's use of personal protective equipment. While it is unlikely that any BFGoodrich employee will be exposed to asbestos in excess of the PEL or EL, many employees are involved in Class I, II or III tasks including changing asbestos gaskets or transite removal or maintenance jobs involving incidental disturbance of installed asbestos products.

Purpose

This program is intended to:

- Insure the effectiveness of work practices and use of personal protective equipment to minimize employee exposure to asbestos and prevent asbestos-related health effects,
- Insure that employees may safely use respiratory protective equipment as required by their job (see Section 1.2.3 - Medical Clearance for Respirator Use),
- Identify employees with other medical problems or health risks so that they may be referred for appropriate evaluation.

Exhibit
EXHIBIT D

Participation

Facility health and safety personnel must determine which employees will be included in the asbestos medical program. This determination may require performance of industrial hygiene sampling to document representative air levels; however, for work around installed buildings materials, the requirements are based on the nature of the work regardless of exposure level. All employees whose work involves potential exposure to asbestos must be medically cleared for respirator use. The asbestos and respirator examinations must be conducted prior to placement in a job with potential exposure to asbestos. Employees are not to be issued respirators, fit tested or trained for respirator use until they have been medically cleared.

Content

Asbestos medical surveillance and respirator clearance require the following:

- Review of respirator use requirements;
- Review of pertinent medical and work history with special emphasis on the pulmonary, cardiovascular and gastrointestinal systems;
- Pulmonary function test to include FEV₁, FEV₁/FVC, % of predicted FEV₁ and % of predicted FVC;
- Physical examination with special emphasis on pulmonary and gastrointestinal systems;
- Chest x-ray.

Chest x-rays must be performed at the time of initial placement and then at five and ten years after placement. For employees who have more than ten years since their first exposure, chest x-rays must be performed on the following age-adjusted basis:

Age 15 - 35	every 5 years
Age 36 - 45	every 2 years
Age over 46	annually

All chest x-rays must be interpreted by a certified B-reader, or a board certified or eligible radiologist or other physician with known expertise in the pneumoconioses (dust-related diseases of the lung). The results must be recorded on the ILO B-reader form (Form CSD/NIOSH M 2.8).

Procedure

Each location must identify a local physician to conduct the examinations. Medical surveillance for asbestos exposure under the OSHA standards requires the use of the mandatory medical questionnaire (Appendix D) attached at the end of this guideline.

The physician should be provided with the following:

- A copy of this guideline;
- The OSHA Asbestos Standards, including appendices D, E and I of 29CFR1926.1101;
- Representative exposure levels;
- A description of job duties and use of protective equipment;
- Results of past examinations.

The examining physician will evaluate overall employee health and fitness, concentrating on any problems which may be related to the workplace exposure to asbestos and the employee's ability to perform his or her job safely. The physician will also determine whether the employee is capable of wearing a respirator, as necessary (see Section 1.2.3 - Medical Clearance for Respirator Use).

Evaluation of Health Effects

Acute effects related to asbestos inhalation are minimal and similar to that of nuisance dusts. Three chronic medical conditions have been associated with exposure to high levels of asbestos fibers. These rarely become evident until 10 years from first exposure. They are:

- **Pleural**

Pleural changes are the most common finding in asbestos-exposed workers. These may occur on any pleural surface. These are usually evident on plain x-rays, although oblique films or CT scanning may better document the presence or absence of true pleural changes. Pleural asbestosis is usually asymptomatic and uncomplicated. Pleural asbestosis only rarely causes pleural effusion, and this finding should prompt an evaluation for possible pleural mesothelioma. In general, the presence of pleural findings supports a history of significant past asbestos exposure.

**Evaluation of
Health Effects
(cont'd)**

• **Interstitial**

Interstitial pulmonary fibrosis, or pulmonary asbestosis, is a much more serious development. Chest x-ray findings include irregular opacities which are predominately in the lower lobes. The physical examination may reveal coarse rales in the lung bases. Pulmonary function usually shows restrictive impairment (decreased vital capacity) and impaired diffusion. Obstructive changes may also occur, although this is usually confined to smokers.

• **Mesothelioma**

Mesothelioma is a malignant tumor of the pleural or peritoneal cavity which has been particularly associated with exposure to amphibole asbestos (crocidolite, amosite). This may be confused with poorly differentiated adenocarcinoma, particularly when arising in the abdominal cavity. Proper diagnosis may require review of the tissue specimens by an experienced pathologist.

• **Lung Cancer**

An excess incidence of lung cancer has also been reported in epidemiologic studies of asbestos workers. This excess has primarily been associated with the combination of asbestos exposure and cigarette smoking. The extent to which asbestos exposure alone is a significant risk factor for developing lung cancer remains uncertain.

• **Other Cancer**

Several other types of cancer have been considered as possibly being related to asbestos exposure. These include gastrointestinal cancers and kidney cancer. Findings from limited studies in these areas have been inconsistent.

**Interpretation
of Results**

The interpretation of the significance of any given finding in an individual with exposure to asbestos requires careful consideration of the following:

- The significance of the finding,
- The intensity of the exposure,
- Other possible causes of the finding,
- Latency between exposure and effect.

**Interpretation
of Results
(cont'd)**

Proper diagnosis requires a thoughtful history, careful examination and appropriate testing. The determination of whether an individual has developed asbestos-related health effects requires a clear understanding of the pathophysiology of asbestos-related disease.

All persons who are diagnosed as having possible asbestos-related disease should be evaluated by an experienced occupational or pulmonary physician. Part of this evaluation should include a review of the work and exposure history to determine the factors which contributed to disease development. Individuals who properly follow current recommended work practices should not develop any asbestos-related findings.

**Separation/
Retirement**

Any employee who was exposed to asbestos at or above the PEL and/or EL is to be provided a complete physical examination 30 days before or after the last day worked. This examination is to be provided regardless of time since last exposure. If the employee has been examined according to this guideline within the prior 12 months, no medical examination is required.

Management

Persons who are diagnosed as having developed asbestos-related health effects must be advised of the finding and its significance. Simple pleural plaques require no specific treatment and should result in no symptoms or disability. In contrast, pulmonary asbestosis may result in significant respiratory impairment. Both mesothelioma and lung cancer can be fatal. Further evaluation and treatment must be managed on a case by case basis. Appropriate BFGoodrich occupational health resources should be consulted in all cases of possible asbestos-related disease.

Experts in the field differ on the issue of whether individuals with asbestos-related findings due to past exposures should be allowed to continue to work in potential exposure areas using protective equipment. If proper procedures are followed, additional exposure and health risk should be minimal. Ultimately, the determination must be made on a case by case basis, considering the health of the effected individual, the risk of exposure and the nature of the work.

**Written
Opinion**

The examining physician must supply the facility with a written opinion on the following for each employee:

- Whether any medical condition is present which presents an increased risk of material health impairment due to exposure to asbestos;
- Whether there are limitations on employee exposure or use of respirators and other protective equipment;

**Written
Opinion
(cont'd)**

- A statement indicating that the employee has been informed of the results of the examination and of any medical conditions which may result from exposure to asbestos;
- A statement that the employee has been informed by the physician of the increased risk of lung cancer attributable to the combined effect of smoking and asbestos exposure.

A copy of the physician's written opinion shall be provided to the affected employee within 15 days of receipt by the employer.

The employee should sign a statement indicating that they have been informed of all the results of the examination.

Confidentiality

The results of the examination that are not directly related to the employee's health and safety in the work environment are confidential. These findings must not be communicated or released to any individual without the employee's written consent.

ASBESTOS CONTAINING PRODUCTS MANUFACTURED BY THE BF GOODRICH COMPANY (Rev. 11-2-00)

PRODUCT NAME & WHERE MANUFACTURED	DATE PRODUCT FIRST PLACED ON MARKET	DATE PRODUCT CEASED TO BE PRODUCED	DESCRIP. OF CHEMICAL COMPOSITION	DESCRIP. OF PHYSICAL APPEARANCE OF PRODUCT	DESCRIPTION OF INTENDED USE	WAS PRODUCT ON US GOVT. QUALIFIED PROD. LIST	SUPPLIER OF RAW ASBESTOS	MISCELLANEOUS INFORMATION	RECORDS AVAILABLE - CUSTODIAN
Purasee Door Hose (Akron, OH & Marion, OH)	Approx. 1955	Approx. 1979	EPDM Rubber w/Asbestos & Wire	Wire Covered Hose	Water cooled doors on steel mills	Unknown	Unknown	Industrial Hose business sold to HBD Thermoid - 1986	Few catalog references/Custodian - See note 1.
Pyrolock - Rocket Insulation (Akron, OH)	1952	1974-1975	Mixture of waterglass, clay, high carbon rubber and chrysotile asbestos (less than 99%)	Brown or gray paste	Line and insulate rocket motor casings	Yes	Johns-Manville Theiford Mines	Purchased by Navy under MIL-C-22608. Made by Adhesives Div.	See Note 1
Sheet Rubber (Akron, OH)	Early 1900's	Approx. 1960	Neoprene Hycar-Rubber Asbestos	Rubber Sheets/Rolls	Gasket Materials & Sheet Packing	Unknown	Unknown		Few catalog references/Custodian - See note 1.
Asphalt Floor Tile (Watertown, MA)	Approx. 1945	Early 1960's	Asphalt, Asbestos & Color, Chrysotile (% Unknown)	9"x9" & 12"x12" Floor Tiles	Floor Covering	Unknown	Rubertoid Theiford Mines, Johns-Manville	Product generally sold east of Mississippi River	Advertising, technical manuals, Custodian - See note 1.
Koroseal Vinyl Asbestos Floor Tile (Watertown, MA)	Approx. 1950	1963	Vinyl, Clay, Asbestos, Color, Plasticizer, Chrysotile (% Unknown)	9"x9" & 12"x12" Floor Tiles	Floor Covering	Unknown	Rubertoid Theiford Mines, Johns-Manville	Product generally sold east of Mississippi River	Advertising, technical manuals, Custodian - See Note 1.
Gaskets (Salem, IN)	1959	Early 1970's	Unknown	Gasket Strip	Gaskets for Dishwasher Doors	Unknown	Unknown		Unknown
Brake Tubes (Akron & Troy, OH)	1963	1970	Rubber Tube w/Asbestos Cover	Rubber Tube	Aircraft & Off-Highway Vehicle Brakes	Yes	See Note #2		Unknown
Aircraft Brake Parts (Troy, OH)	Mid 1940's	1985	Unknown	Brake Assembly	Aircraft Brake Assembly	Yes	See Note #2		Unknown

EXHIBIT E

PRODUCT NAME & WHERE MANUFACTURED	DATE PRODUCT FIRST PLACED ON MARKET	DATE PRODUCT CEASED TO BE PRODUCED	DESCRIP. OF CHEMICAL COMPOSITION	DESCRIP. OF PHYSICAL APPEARANCE OF PRODUCT	DESCRIPTION OF INTENDED USE	WAS PRODUCT ON US GOVT. QUALIFIED PROD. LIST	SUPPLIER OF RAW ASBESTOS	MISCELLANEOUS INFORMATION	RECORDS AVAILABLE - CUSTODIAN
Off-Highway Brake Parts (Troy and Akron, OH)	Late 1950's	1985	Unknown	Brake Assembly	Off-Highway Vehicle Brake Assemblies	Unknown	See Note #2	BPG sold business to Carille Braking Sys., Bloomington, IN - 1990	Unknown
Rocket Insulation (Akron, OH)	1960	1985	Unknown 149W54	Unknown	Used as Insulation in Phoenix Rockets	Yes	Unknown		Unknown
Automobile/Light Truck Brakes (Mfg. Loc. N/A)	1930	1985	Unknown	Replacement Brake Assembly	Auto & Truck Brakes	Unknown	See Note #3	Tire Center business sold to Tire Centers, Inc. - 1985. Now owned by Michelin.	None (Michelin?)
DWA 14 (Akron, OH)	1968	1975	Rubber Resin, Inorganic Filler, Chrysotile 20%	Thick Adhesive	Drywall Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)
PL717-A (Akron, OH)	1969	1985	Epoxy Resin, Chrysotile < 5% (Calidria)	Amber Film	Bonding Aircraft Parts	Unknown	KCAC, See Note #4		Adhesive Systems (See Note 5)
PL717-B (Akron, OH)	1969	1985	Epoxy Film, Chrysotile < 1% (Calidria)	Lt. Cream/Tan Film	Bonding Material (Aircraft)	Unknown	KCAC		Adhesive Systems (See Note 5)
PL729-3 (Akron, OH)	1974	1985	Epoxy Film, Chrysotile < 2% (Calidria)	Beige Film	Bonding Aircraft Parts	Unknown	KCAC		Adhesive Systems (See Note 5)
PL-786 (Akron, OH)	1972	1985	Epoxy Film, Chrysotile 15%	Aluminum Colored Film	Bonding Aircraft Parts	Unknown	Carey & Johns-Manville		Adhesive Systems (See Note 5)
R-907-T (Akron, OH)	1955	1985	Rubber, Asphalt, Inorganic Filler, Chrysotile 6%	Black Adhesive	Roof Vapor Barrier Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)

PRODUCT NAME & WHERE MANUFACTURED	DATE PRODUCT FIRST PLACED ON MARKET	DATE PRODUCT CEASED TO BE PRODUCED	DESCRIP. OF CHEMICAL COMPOSITION	DESCRIP. OF PHYSICAL APPEARANCE OF PRODUCT	DESCRIPTION OF INTENDED USE	WAS PRODUCT ON US GOVT. QUALIFIED PROD. LIST	SUPPLIER OF RAW ASBESTOS	MISCELLANEOUS INFORMATION	RECORDS AVAILABLE - CUSTODIAN
Permate (Akron, OH)	1955	1985	Rubber, Asphalt, Inorganic Filler, Chrysotile 6%	Black Adhesive	Roof Vapor Barrier Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)
PL-200 (Akron, OH)	1964	1980	Rubber, Resin, Inorganic Filler, Chrysotile 21%	Black Adhesive	Panel Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)
PL-400 (Akron, OH)	1966	1980	Rubber, Resin, Inorganic Filler, Chrysotile 19%	Gray Adhesive	Sub Floor Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)
R-1106-T (Akron, OH)	1971	1980	Reclaimed Rubber, Resin, Filler & Solvent, Chrysotile 6%	Gray Mastic	Temporary Branding of Cattle	Searching	Carey & Johns-Manville		Adhesive Systems (See Note 5)
DA-100 (Akron, OH)	1962	1965	Rubber, Resin, Filler, Solvent, Chrysotile 20%	Black Mastic	Drywall Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)
A-1484-B (Akron, OH)	1979	1983	Vinyl, Solvent, Filler, Chrysotile 2% (Calidria)	White Putty	Vinyl Window Putty	No	KCAC		Adhesive Systems (See Note 5)
PL731 (Akron, OH)	1976	1989	Aluminum Filled Epoxy FBM, Chrysotile < 1% (Calidria)	Amber Film	Bonding Aircraft Parts	No	KCAC		Adhesive Systems (See Note 5)
PL-410B-6 (Akron, OH)	1968	1992	Amino Fillers, Oil, Chrysotile < 5%	Thick Cream	Urethane Sealant	Yes	Johns-Manville		Adhesive Systems (See Note 5)
DSA 100 (Akron, OH)	Unknown	Unknown	Resin, Rubber, Filler Solvent, Chrysotile 20%	Black Mastic	Drywall Adhesive	No	Carey & Johns-Manville		Adhesive Systems (See Note 5)

PRODUCT NAME & WHERE MANUFACTURED	DATE PRODUCT FIRST PLACED ON MARKET	DATE PRODUCT CEASED TO BE PRODUCED	DESCRIP. OF CHEMICAL COMPOSITION	DESCRIP. OF PHYSICAL APPEARANCE OF PRODUCT	DESCRIPTION OF INTENDED USE	WAS PRODUCT ON US GOVT. QUALIFIED PROD. LIST	SUPPLIER OF RAW ASBESTOS	MISCELLANEOUS INFORMATION	RECORDS AVAILABLE - CUSTODIAN
DSA 300 (Akron, OH)	Unknown	Unknown	Rubber Resin, Inorganic Filler, Chrysotile 25%	Black Adhesive	Dry Wall Adhesive	No	Carey & Johns- Manville		Adhesive Systems (See Note 5)

- Notes:
1. Custodian is The BFGoodrich Company, 4 Coliseum Centre, 2730 W. Tyvola Road, Charlotte, NC 28217.
 2. Manufactured asbestos component parts were purchased from suppliers and used in brake assemblies manufactured by BFGoodrich.
 3. BFGoodrich purchased entire brake assembly and simply installed at auto service centers.
 4. KCAC address is PO Box K, Cattlemen Road, King City, California 93930.
 5. Business sold to Sovereign Engineered Adhesives, L.L.C. - 3-31-96 (now SIA Adhesives), 123 Bantjes St., Akron, OH 44311.

Publications subscribed to by Health and Environmental Services with dates where known.

1. American Ind. Hygiene Association Journal
1946 through 1991.
2. Archives of Environmental Health
1961 through 1982.
3. Archives of Industrial Hygiene & Occupational Medicine
1950 through 1960. Note that name was changed to #2 above in 1961.
4. British Journal of Industrial Medicine
1972 through 1993.
5. Cancer Journal
6. Environment Midwest
7. Environmental Research
1974 through 1980.
8. Environmental Science and Technology
9. Health and Safety
10. Industrial Medicine (1935) and Surgery (1950)
11. Job Safety and Health
12. Journal of Air Pollution Control Association
13. Journal of American Medical Association
Kept on current year basis.
14. Journal of Occupational Medicine
1959 (Ongoing).
15. National Safety News
16. Occupational Hazards
17. Ohio State Medical Journal
18. Pollution Engineering
19. Preventive Medicine

EXHIBIT F

20. Today's Health
21. Toxicology and Applied Pharmacology
1959 (ongoing).
22. Water and Pollution Control
23. NIOSH Technical Information
1972 (ongoing).
24. NIOSH Criteria For a Recommended Standard
1972 (ongoing).
25. Occupational Safety and Health Reporter
1972 (ongoing).
26. American Industrial Hygiene Association: Hygienic Guidelines
NOTE: (Rev. 7-22-99) Per M. B. Butterfield, she shows we started
Subscribing at least as far back as 1958.
27. NIOSH Manual of Analytical Methods
1972 (ongoing).
28. AIHA Analytical Abstracts
29. EPA Analytical Quality Control
30. MCA - Chemical Safety Data Sheets
31. OSHA - Standards
32. OSHA - Reporter
33. OSHA - Letter
34. Environmental Health Perspective
1973 (ongoing).
35. Journal of Toxicology and Environmental Health
1976 through 1977
1983 (ongoing).