

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
FORD COUNTY

ANNA WOELLMS, Individually and as
Special Administrator for the
Estate of WILLIE WOELLMS, Deceased,

Plaintiff,

vs.

ARMSTRONG WORLD INDUSTRIES, INC.,
et al.,

Defendants.

Law No. 89 L 29

PLAINTIFF'S EXHIBIT

K-1931

SUPPLEMENTAL DISCOVERY RESPONSES

Defendant Owens-Illinois, Inc. hereby submits the attached
supplemental discovery response.

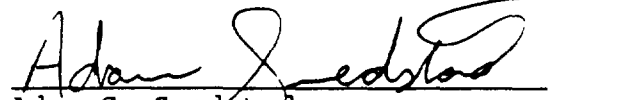

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Attorneys for Defendant
Owens-Illinois, Inc.

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Supplemental Discovery Responses of Owens-Illinois, Inc. was served upon attorney for plaintiffs in the above cause by enclosing same in an envelope addressed to such attorney at his business address as disclosed by the pleadings of record herein, with postage fully prepaid, and by depositing said envelope in a U.S. Post Office Box in Chicago, Illinois, on the 30th day of September, 1993.


Adam C. Smedstad

*Exhibits in System
at OI 9.01*

**SUPPLEMENTATION TO ANSWERS TO INTERROGATORIES
AND RESPONSES TO REQUESTS FOR ADMISSIONS
AND FOR PRODUCTION OF DOCUMENTS**

Owens-Illinois hereby supplements all existing Interrogatory Answers, Responses to Requests for Admissions and Responses to Requests to Produce Documents previously served in the FORD COUNTY Asbestos Litigation to the extent that any such interrogatory, request for admission or document request seeks to elicit information or admissions of the following nature or documents related thereto:

Owens-Illinois recently discovered certain documents concerning the Kimax line of glass pipe that contain information that may be responsive to previously filed discovery requests. It has commenced an investigation concerning this information. The investigation is continuing. Its investigation has thus far disclosed the following:

From approximately 1959 through 1977, the Kimble Glass Company, a unit of Owens-Illinois, Inc., manufactured and sold the Kimax line of glass pipe intended for use by various industries including chemical, food, dairy products, pharmaceutical, textiles, paper and pulp as well as photo engravers, aeronautical researchers and atomic energy plants. From 1959 to 1966 the glass pipe was a conical end glass process pipe. From 1966 to 1977 a beaded glass process pipe was added to the product line. The glass pipe did not contain asbestos as one of its ingredients.

Gaskets, inserts and spacers were utilized as accessory parts of the conical end glass process piping system. The gaskets, inserts and spacers were not manufactured by Kimble. The accessory parts were not utilized by the dairy industry as that industry used a different coupling and associated accessories. Records made available to and reviewed by Owens-Illinois indicate

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that, during the last quarter of 1963, Kimble Glass Company began to offer for sale these accessory parts in conjunction with the sale or use of Kimax glass pipe. Other records made available to and reviewed by Owens-Illinois indicate that these accessory materials were manufactured or supplied by Garlock, Inc., Chicago Gasket Company, Micromold Products Corp., Fischer & Porter, Sullivan Asbestos Corp., Amsco Sales Corp., and Johns-Manville. While the investigation to date has not disclosed all of the sales on an annual basis, records made available to Owens-Illinois indicate that the total dollar amount of sales of these accessory parts which contained asbestos as one of its ingredients was approximately \$28,000 in 1974, \$41,500 in 1976 and \$39,950 in 1977.

Gaskets were intended to be used as an interface between the pipe ends to prevent glass to glass contact. Inserts were intended to be used for cushioning pipe ends from metal flanges. Spacers were intended to be used to join glass pipe to glass lined steel pipe. The gaskets, inserts and spacers were small, being used with glass pipe ranging in diameters from one inch to six inches. The thickness of the gaskets was approximately 1/8 of an inch and the thickness of the spacers ranged from approximately 1/4 of an inch to 3/8 of an inch. Some of the gaskets included asbestos as one of their ingredients, including the use of asbestos described in the product catalogue as blue african asbestos when resilience and corrosion resistance were required. Many gaskets were sold which contained neoprene or Teflon as one of their ingredients and no asbestos. The spacers and inserts also included asbestos as one of their ingredients. Due to the small size of these accessory parts, the amount of asbestos would have been limited. The accessory parts were used in conjunction with low heat applications where the normal operating temperature was 250°F or less and the maximum operating temperature was 450°F.

The spacers were substantially encapsulated with Teflon which covered all of the spacer except for the outer rim. A portion of the gaskets were also encapsulated with a Teflon covering. The inserts contained asbestos impregnated into a black neoprene material. It was a hard pressed material.

The gaskets, inserts and spacers were made to fit and did not require cutting for use with the glass piping systems.

In approximately 1966 a new Kimax glass pipe known as the Kimax beaded process pipe was first made available for sale. The beaded pipe allowed on site fabrication,

including the creation of a new bead for the coupling to sit on. This made the product more versatile than the conical end pipe which, however, remained available for sale. Use of the beaded glass process pipe did not involve the use of asbestos containing accessory products except for gaskets where the beaded glass process pipe connected to existing conical end glass process pipe. A field beading kit was available for use in connection with field fabrication of the beaded glass pipe. The kit included a small plate approximately 10"-12" in width and length for fire protection purposes and a covering over each of two small hoses included in the kit. The plate and hose coverings may possibly have contained asbestos, but Owens-Illinois cannot yet confirm the ingredients of these materials based upon its business records presently reviewed in connection with this investigation. While the investigation to date has not disclosed all of the sales on an annual basis, records made available to Owens-Illinois indicate that 22 beading kits were sold in 1974 for a total annual dollar sales volume of \$7,320, that 25 beading kits were sold in 1976 for a total annual dollar sales volume of \$10,374 and that 19 beading kits were sold in 1977 for a total annual sales volume of \$8,151.

Kimble also sold Glass-Lined Reactors manufactured by Schwelm for a period of time presently unknown. The reactors ranged in capacities from 300 gallons to 5000 gallons. The reactor vessels contained gaskets, not manufactured by Kimble, which were encapsulated with Teflon and included asbestos as one of their ingredients.

Kontes Glass Company, which was a subsidiary of Owens-Illinois during 1982-1985, purchased certain asbestos containing materials from other manufacturers and incorporated those materials into four of its products during the period 1982 through 1985. Kontes Glass Company is primarily a manufacturer of laboratory glass products. During 1982 and 1983, Kontes Glass Company incorporated an asbestos containing gasket into a flask clamp. A total of 496 were sold during the two year period and nine replacement gaskets were sold during the same period of time. During 1982 and 1983, Kontes Glass sold two vacuum pumps which contained a small amount of asbestos tape wrapped around a vapor tube. During 1983 Kontes Glass sold three Sweep Co-Distillation Apparatuses which included asbestos containing plates inside the heater portion of the apparatus. From 1982 through 1985, Kontes Glass also sold a Kjeldahl Digestion-Distillation Apparatus which included an asbestos containing cover and an asbestos containing mounting plate for the heater which was inside the apparatus. Eighty-three (83) of these apparatuses were sold during the entire four year period. In addition,

223 replacement heaters with the mounting plate and 12 of the covers were sold during the same four year period. As stated above, the asbestos containing parts were not manufactured by Kontes Glass, but were purchased from other manufacturers and incorporated into the products by Kontes Glass.

On or about December 30, 1977, Owens-Illinois transferred certain assets to OI/Schott Process Systems, Inc., including the Kimax Process Pipe Production facility and other property related to the Kimax Process Pipe product line in exchange for 50% of the stock of OI/Schott Process Systems, Inc. In addition the right to sell Schwelm Reactor vessels was included in OI/Schott's product line. After the transfer of the Kimax Process Pipe assets to OI/Schott Process Systems, Inc., Owens-Illinois did not thereafter sell any of the process pipe or the accessory products described above. Pursuant to a Sales Agreement dated May 24, 1990, Owens-Illinois sold its 50% interest in OI/Schott Process Systems, Inc. to Schott Corporation.

Owens-Illinois will make all of the documents related to the foregoing matters, which have been recently discovered, available for inspection and copying at the offices of its counsel, Bernstein, Shur, Sawyer & Nelson in Portland, Maine upon request.

Owens-Illinois is presently continuing its investigation and will further supplement its discovery responses in the future if it becomes necessary.

Dated: September 22, 1993.

OWENS-ILLINOIS, INC.

By: H. G. Bruss

H. G. Bruss

September 22, 1993

Then personally appeared the above named H. G. Bruss, in his capacity as Assistant Secretary of Owens-Illinois, Inc. and made oath that the foregoing supplementation to Answers to Interrogatories, Responses to Requests for Admissions and for Production of Documents is true to the best of his knowledge, information and belief.

Before me,

Margaret Leigh Prebe
Notary Public

MARGARET LEIGH PREBE
Notary Public, State of Ohio
My Commission Expires 2-1-96