



To Mr. J.M. Atkinson, T & N Limited
From T.L. Forsyth
Date 13th June 1978

PLAINTIFF'S
EXHIBIT
CT-128

Keasbey & Mattison & Certain-teed

I am afraid that in reply to your request I can only go on personal recollection since we do not retain file material over a large number of years and since we sold K & M in 1962 there is very little on file directly concerning that company. However the general technical background at K & M was very similar to that applying both at Newalls and TAC since K & M made substantial quantities of asbestos cement and, for the same length of time as Newalls, they made 85% magnesia insulation, the diatomaceous modifications of that product and finally calcium silicate insulation.

From time to time I had discussions with personnel at K & M as they visited us and as I visited them and there is no doubt in my mind that their technical people were well aware of the asbestos health risk at any rate so far as asbestosis itself was concerned. Up till 1962, although some work had been done on the connection between exposure to asbestos and the occurrence of mesothelioma, this connection was not extensively publicised even amongst the technical people either in K & M or at Newalls.

When K & M was sold the remaining thermal insulation activity there, which was calcium silicate manufacture, was disposed of separately to Nicolet Industries. Therefore there was no particular reason why the Certain-teed people should be familiar with the asbestos hazard insofar as thermal insulation was concerned. Of course they were well experienced in the manufacture and use of AC products and I would be surprised to find that they did not know something of the asbestosis hazard at any rate prior to 1962.

In August 1973 I visited Certain-teed specifically in connection with their investigation of an offer made to them by the Calsilite Corporation to sell to Certain-teed their process for making asbestos-free calcium silicate and the plant which had until then been used to make the asbestos-containing product. At that time I am in no doubt that the officials concerned at Certain-teed were aware of the need to be making an asbestos-free rather than an asbestos-containing product and that it was the medical hazard of exposure to asbestos which created this need. I do not know in what detail they were familiar with the hazard and the possible physiological results of exposure.

My memory of the general environmental conditions applying at the Ambler, Pa. factory of K & M was that they were similar to those applying in Newalls at that time, particularly in the areas in which asbestos-containing insulation was being machined.

100 10 15 1971

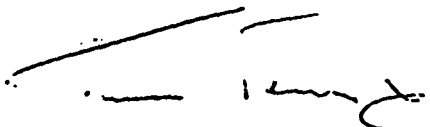
- 2 -

(I may say that the conditions at Atlas at that time were even worse than those at Newalls and some at least of the Atlas practices derived from K & M's. operations).

I have never seen any of the Certain-teed operations concerned with the use of asbestos fibre but my memory of their glass fibre operations at the time which pre-dates the introduction of St. Gobain into Certain-teed is that the conditions were reasonable but involved exposure to glass fibre dust in quantities which might now be thought to be excessive.

I hope that the above information will be enough for your purpose but it may be of further assistance to tell you that during my 1973 calcium silicate investigation at Certain-teed I found they were still employing an ex K & M employee called Willard R. Seipt and it is probable that he is still employed in their asbestos pipe department. Willard Seipt was a senior Technical Officer in the K & M Research Department and for a period his specific responsibility was the development of calcium silicate insulation, firstly by a process of their own devising and secondly by adopting our own process. He will undoubtedly have a detailed knowledge of the K & M factory situation. Furthermore, in the Patents Department of Certain-teed, there was still employed in 1973 Clyde R. Hutchcroft who was for many years the Research Manager at K & M with a more complete general knowledge of asbestos usage and exposure situations than Seipt. I think in 1973 Hutchcroft was only a year from retirement but I am sure Certain-teed Pensions Department would know of his whereabouts if he is still alive.

If it is permissible to approach Certain-teed in this matter I think you would get extremely accurate information at any rate regarding K & M from either of these two named gentlemen.


T.L. Forsyth

TLF/MP