just information purposes, to understand what the company was working on. They didn't necessarily pertain to you and if you had the time to read it and you wanted to read it, you read it.

Q What was your practice in a marketing area as it relates to products that you were selling that contained PCBs? Was it your attempt personally to try and keep up to date on what research was being done on those products?

A If I could interpret them and make use of the information, but something like that, I would rely on an Elmer Wheeler or go back to Bill Richard and say, "Bill, what do I do with this? What does it really mean to me? What does it mean to my customers and if there is something we have to do as a result of this, then tell us what we need to do."

They are the experts.

Q Did you have occasion to do that on a regular basis, namely, go to Dr. Richard or Mr. Wheeler and say, "What am I supposed to do with this information that has been provided to me regarding PCBs?"

A I would say as the environmental questions came up, there was a wealth of advice just as Bill Richard's at the time, as I told you, of the Swedish thing. He

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saw and envisioned that we had to be doing certain things, but that again is based on his interpretation, not necessarily mine, because I don't understand that kind of thing. My degree is in marketing, not in microbiology or chemistry.

Q During the year 1969, what were your salesmen instructed to say regarding PCBs?

A '69, we didn't have any inquiries. There were no responses from customers and on something like toxicity questions and what have you, I told you before if we had inquiries through the salesmen from a customer, we would route it to Elmer Wheeler and let him talk to their industrial hygienist and relate the handling characteristics of these products.

Q For the period up through 1969, would it be accurate to say that the position of Monsanto with regard to its salesmen was that they shouldn't say anything unless there was an inquiry from a customer regarding PCBs?

A PCBs relative to what?

Q Relative to either human health effects or presence in the environment.

A Health effects, there was information stated on the label. There was information stated in the brochures and the salesmen understood that they were not

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a cup of coffee. They were industrial chemicals.

Q That is the same information that had been available for five, ten years?

A Right.

Q Setting these aside, dealing with anything that arose out of or following the Swedish studies with regard to either presence in the environment or particular health effects as a result of the presence of PCBs in the environment, with regard to those subject matters, were your salesmen then advised not to really say anything unless there was a specific inquiry from a customer?

A Let's say the salesmen, based on the Swedish problem, were probably told that and the fact that the company was really looking at it. And if they got any inquiries, don't try to handle it yourself because it is probably well beyond your capability to answer and my capability to accurately interpret what they are asking about and give them information, so we passed it on to people in St. Louis.

Q Absent an inquiry, don't say anything in the affirmative less you screw it up?

A That's why Bill Papageorge was brought in to be the environmental person that we could funnel all these inquiries into.

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Q He was not in place in 1969?

A I don't know when Bill came in.

Q Were these salesmen told what you have just related by you orally? Was it in writing, what was this?

A Probably orally at that point, and understand that I don't know much at this point and they know less.

Q I understand. I am just trying to find out what was done in the company to either anticipate problems that may have never arisen or how to acquaint its salesmen with how they should handle the situation. That is one of the things you traditionally had done and your department had done, is it not, with regard to any kind of problem?

A When you said '69, there was a sales meeting in '69. There was a sales meeting in '68. What transpired at these meetings and whether we brought people over, like an Elmer Wheeler or Bill Richard, to speak at the meeting relative to the Swedish thing, I don't really remember.

If the data or we were along far enough that it was meaningful and that something should have been disseminated to the salesmen, I assure you it was.

Q That would have gone through you?

A It would have gone through me at the sales

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