

IN THE CIRCUIT COURT FOR ETOWAH COUNTY, ALABAMA

(Transferred from the Circuit Court of

Calhoun County, Alabama)

SABRINA ABERNATHY, et al.,

Plaintiffs,

versus

CIVIL ACTION NUMBER

CV-2001-832

MONSANTO COMPANY, et al., (Consolidated)

Defendants.

DEPOSITION OF WILLIAM TAYLOR CAMBRON

The deposition of William Taylor Cambron was taken before Misty Perry Sanders, as Commissioner, commencing at 9:00 a.m., on January 4th, 2002, by the Plaintiffs, at the law offices of Fite, Field & Miller, LLC, 1000 Quintard Avenue, Anniston, Alabama, pursuant to the stipulations set forth herein.

Regional Reporting Service, Inc.
755 Walnut Street
Gadsden, Alabama 35901-0755

1 S T I P U L A T I O N S
2 IT IS STIPULATED AND AGREED, by and
3 between the parties, through their respective
4 counsel, that the deposition of William Taylor
5 Cambron, may be taken before Misty Perry Sanders,
6 as Commissioner and Notary Public, Alabama at
7 Large, at Anniston, Alabama, on January 4th, 2002,
8 commencing at 9:00 a.m.
9 IT IS STIPULATED AND AGREED that the
10 signature to and reading of the deposition by
11 the witness is waived, the deposition to have
12 the same force and effect as if full compliance
13 were had with all laws and rules of Court
14 relating to the taking of depositions.
15 IT IS STIPULATED AND AGREED that it
16 shall not be necessary for any objections to be
17 made by counsel to any questions except as to
18 form or leading questions and that counsel may
19 make objections and assign grounds at the time
20 of trial or at the time said deposition is
21 offered in evidence or prior thereto.
22 IT IS STIPULATED AND AGREED that notice
23 of filing by the Commissioner is waived.

1 A P P E A R A N C E S
2
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20 E X A M I N A T I O N
21
22 Witness: WILLIAM TAYLOR CAMBRON Page
23 BY MR. CUNNINGHAM 4
24
25 E X H I B I T S
26
27 Plaintiffs' Marked Offered
28 Exhibit One 75
29
30 No other exhibits were marked for identification,
31 offered, or attached as exhibits hereto.

1 STATE OF ALABAMA, CITY OF ANNISTON
2 JANUARY 4, 2002
3
4 WILLIAM TAYLOR CAMBRON,
5 after having been first duly sworn, was
6 examined and testified as follows:
7
8 THE COURT REPORTER: Usual
9 stipulations?
10 MR. CUNNINGHAM: Yes, ma'am.
11 MR. MYERS: Yes, ma'am.
12
13 EXAMINATION
14 BY MR. CUNNINGHAM:
15 Q. Sir, my name is Charlie Cunningham. And
16 I'm here today to ask you some questions to
17 find out what factual knowledge you may
18 have that will help the parties in a
19 lawsuit styled Abernathy, et al., versus
20 Monsanto, et al., that's been filed here in
21 Calhoun County. I represent about
22 thirty-five hundred folks that have sued
23 Monsanto, and I assume you know that?

Page 5 1 A. Yeah. 2 Q. I'm going to -- have you ever been deposed 3 before? 4 A. Yeah. I think it was a few years ago 5 actually up here and one time in -- was it 6 Delaware? I believe it was Delaware, 7 yeah. It was cold. I remember that part. 8 Q. That was probably in the insurance case? 9 A. Yeah. 10 Q. And then you're saying you think you were 11 deposed once here, and that probably was 12 in the Owens case? 13 A. I don't know which one it was. I know it 14 was in Arthur Fite's office. 15 MR. MYERS: It was. 16 Q. And other than that, have you ever been in 17 depositions? 18 A. Uh-uh (indicating no). 19 Q. You know, then, the drill because you've 20 been through it twice. But I'm going to 21 tell you two things about me that you may 22 not have encountered before. The first 23 bad habit of mine is that I'll ask you a	Page 7 1 A. William Taylor Cambron. Bill is really 2 what I go by. 3 Q. Okay. And where do you live, Mr. Cambron? 4 A. 230 Shamrock Road, Anniston, 36207. 5 Q. I am not familiar with Shamrock Road. 6 What part of Anniston is that in? 7 A. That's over in Golden Springs. 8 Q. Golden Springs. I know where that is. 9 And tell me how long you've lived there, 10 please. 11 A. We've lived there about three years. 12 Q. And before that, where did you reside? 13 A. On -- well, actually, we moved in my 14 parents' house up on 22nd for about a 15 year. It was a bad move. But when they 16 died, we just -- and we lived on Allen 17 Dale Road before that. 18 Q. And what part of town is Allen Dale Road 19 in? 20 A. It's out in the Coldwater area. 21 Q. Okay. And before that? 22 A. Brindley Road in Saks. 23 Q. Okay. And before that?
Page 6 1 question, and you'll give me an answer, 2 and I'll think you're finished when you're 3 not. And I'll go on to another question, 4 and by doing so, I will have prevented you 5 from giving a complete answer. Sometimes 6 I just have this burst of inspiration, and 7 I fire a question off and again have cut 8 you off. So if I do that, let us know 9 because we want you to have a chance to 10 give complete answers. 11 A. Okay. 12 Q. The second bad habit of mine is I'll ask a 13 question, and I'll phrase it, and it 14 sounds for all the world like I know what 15 I'm talking about, and I really don't. So 16 if I say something, and it sounds like 17 it's not true compared to what you know, 18 let me know that. Don't assume I know 19 what I'm talking about because I may not. 20 Okay? 21 A. Okay. 22 Q. All right. Let's start off easy. Would 23 you tell us your full name, please?	Page 8 1 A. Before that, I was in -- on Wilmer Avenue 2 in Anniston. 3 Q. And in what part of Anniston is Wilmer? 4 A. Well, it was 2912 Wilmer. It was in the 5 north part. 6 Q. The reason I go through all of this is 7 just to see if you might have had 8 environmental exposure to the PCBs, as 9 opposed to the occupational exposure. It 10 doesn't sound like you've ever lived 11 particularly close to the plant? 12 A. No. 13 Q. You're married, I assume? You talked 14 about we when you talked about where you 15 lived. 16 A. Uh-huh (indicating yes). 17 Q. What's your wife's name? 18 A. Shirley. 19 Q. What's her maiden name? 20 A. Carroll. 21 Q. Has she ever had her PCB level checked? 22 A. Her? 23 Q. Uh-huh (indicating yes).

Page 9 1 A. No. 2 Q. Do you have children? 3 A. I've got three, and she's got two. 4 Q. If you would, tell me yours, please. 5 A. Debby. 6 Q. And what's her last name these days? 7 A. Brooks now. 8 Q. Okay. Go ahead. 9 A. And William, Jr. -- William T., Jr. 10 Q. Okay. 11 A. And Barry. 12 Q. Any of them ever had PCB levels checked? 13 A. No. 14 Q. If I ask you for a list of adult relatives 15 by blood or marriage who live in Etowah 16 County -- 17 A. Etowah County? 18 Q. Etowah County, the Gadsden area. 19 A. Uh-huh (indicating yes.) 20 Q. -- basically who might be potential jurors 21 when this case gets tried up there using 22 an Etowah County jury panel, would that be 23 a long list or a short list?	Page 11 1 Q. Have you reviewed anything, looked at any 2 documents or your transcript from your 3 earlier depositions? 4 A. In preparation for this? 5 Q. Uh-huh (indicating yes). 6 A. No, sir. 7 Q. Do you remember reading those transcripts 8 at some point in the past? 9 A. I don't even think I got -- after I did 10 that, I don't think I read anything about 11 it. 12 Q. Okay. Do you have any idea what you might 13 testify about in this case if you were 14 called as a witness by Monsanto? 15 A. Do I have any idea why I'm here? 16 Q. Yeah. We found your name on a witness 17 list, and we're just curious as to what 18 you might be testifying about, if you 19 know. 20 A. I guess because I worked at Monsanto. 21 Q. As I talk to you today and ask you 22 questions, I'm going to assume since you 23 haven't spoken to anybody or looked at
Page 10 1 A. It would be a short list. 2 Q. Can you tell me, then, who those folks 3 are? 4 A. My brother lives over there, Charles. 5 Q. Okay. 6 A. And his wife, Jean. 7 Q. Okay. Do they have any adult children 8 who's still living in the county? 9 A. Yeah. They've got one adult child that 10 lives in Gadsden. Beth Hill. 11 Q. Beth Hill? 12 A. Uh-huh (indicating yes). 13 Q. Okay. In getting ready to come over 14 today, did you speak with anyone other 15 than Mr. Myers? 16 A. No. It was too early. 17 Q. Well, even before today -- I mean, for 18 instance, in the last couple of weeks, 19 from the time you found out this would 20 happen. 21 A. The only one I've talked to was Mr. Mike 22 Kelly. And all he did was tell me the 23 date and time.	Page 12 1 anything that every answer you give me is 2 going to be based on your own independent 3 recollection of things. Okay? 4 A. Right. 5 Q. If when I ask you a question, though, it 6 makes you remember that last year, you 7 talked to So-and-so and he said 8 such-and-such, that's great. I'd like to 9 know that too. Just let me know that 10 that's the source, okay, so we all know 11 what's recollection and what's something 12 coming from another direction. All right? 13 A. Okay. 14 Q. Tell me, if you would, please, what 15 education you have. 16 A. I've got a college degree from 17 Jacksonville State, major in accounting. 18 Q. And when did you obtain that degree? 19 A. 1975. 20 Q. That would be a BS, I assume? 21 A. Uh-huh (indicating yes). 22 MR. MYERS: You need to say yes or 23 no and not uh-huh because it's

Page 13 1 hard for her to take down. 2 Q. Now, you strike me as a guy who's maybe 3 just a tad older than somebody who would 4 have gone straight from high school to 5 college and getting a degree in '75. 6 A. Right. 7 Q. Where did you graduate high school? 8 A. Anniston High School, 1957. 9 Q. Okay. 10 A. And, yes, sir, there was a delay. 11 Q. I've got you. Did you have any other kind 12 of college course work, other than the 13 work you did at JSU, to get your 14 accounting degree? 15 A. No. I went on the GI Bill. 16 Q. Was that a -- I'm guessing you were 17 probably working while you were going to 18 school? 19 A. Uh-huh (indicating yes). 20 Q. So it might not have been a classical 21 four-year effort, and you might have 22 needed more time than that to get the 23 degree?	Page 15 1 Lejeune in North Carolina. 2 Q. Let me take you through your work history 3 before Monsanto or after Monsanto, 4 everything you did for gainful employment 5 other than work at Monsanto. 6 A. Okay. 7 Q. And I presume that would have started when 8 you got out of the Marines in '59? 9 A. Uh-huh (indicating yes). 10 Q. What was the first job you had when -- 11 A. The first job when I got out? I worked at 12 a GE plant that's no longer here, but it 13 was down in Oxford. 14 Q. Making vacuum tubes? 15 A. Yeah. I worked in the resistor 16 department. 17 Q. Just as a matter of routine, what sort of 18 things did you do in the resistor 19 department? 20 A. I just -- I started out as a service 21 operator. And whenever -- I'd just pick 22 up production every hour and -- 23 Q. You weren't exposed to any kind of
Page 14 1 A. I think I did it pretty much -- 2 Q. In four years? 3 A. It might have been like four and a half. 4 I don't remember. 5 Q. Okay. Let me take you if I can, please, 6 through your -- you said GI Bill, so I'm 7 guessing you served in the military? 8 A. Yeah. I was in the Marines. 9 Q. When did you serve in the corps? 10 A. '57 to '59. 11 Q. Straight out of high school? 12 A. Uh-huh (indicating yes). 13 Q. Yes? 14 A. Yes, yes. 15 Q. What did you do as a Marine? Aside from a 16 lot of running and grunting, what was your 17 official -- 18 A. I was in the infantry. 19 Q. Infantry? 20 A. Uh-huh (indicating yes). 21 Q. And where did you serve? 22 A. Well, I was at Paris Island, of course, 23 for basic, and then, I went to Camp	Page 16 1 chemicals or anything, then, on the job? 2 A. No. 3 Q. How long did that job last? 4 A. It lasted probably about nine months. 5 Q. Okay. 6 A. And then, I got hired at Monsanto. 7 Q. And was that the last job you ever -- 8 A. Uh-huh (indicating yes). 9 Q. Okay. That makes that easy. How's your 10 health, Mr. Cambron? 11 A. It's good. 12 Q. Ever had any surgeries? 13 A. I had one surgery in my whole life, and 14 that was gallbladder. 15 Q. Ever been diagnosed with cancer of any 16 sort? 17 A. No. 18 Q. Do you consume alcoholic beverages? 19 A. No, sir. 20 Q. Do you smoke tobacco or use any kind of 21 tobacco product? 22 A. No. 23 Q. Have you ever historically consumed

Page 17 1 alcohol or tobacco? 2 A. Yes, for a short period. 3 Q. From '57 to '59, I'll bet? 4 A. Yes, and little bit afterwards. 5 Q. Nothing wrong with that. I'm from 6 Kentucky, so we like people who consume 7 both of those every once in a while. 8 A. I don't agree with you on that, but that's 9 fine. 10 Q. Well, I don't either, quite candidly. Do 11 you presently work at Monsanto, or are you 12 retired? 13 A. I'm retired. 14 Q. When did you retire? 15 A. December of '97. 16 Q. Do you still receive any sort of economic 17 benefits from Monsanto? 18 A. Well, yeah. I mean, you know -- well, I 19 took my retirement in a lump sum. And 20 it's not with them any longer, but they 21 provided it. 22 Q. Do you receive a subsidized health 23 insurance benefit?	Page 19 1 of thing, basically the same thing all the 2 union presidents do. 3 Q. In contrast to one of the fellows who was 4 the vice president because the vice 5 president said not much when -- 6 A. Right. 7 Q. But the president, that's where the rubber 8 meets the road. You were the contact man 9 with management, right? 10 A. Right. Well, me and the committee, but 11 basically, the president done most of 12 the -- 13 Q. And I assume you took that responsibility 14 seriously? 15 A. Oh, yeah. 16 Q. That was a position you were elected to by 17 the rank and file? 18 A. Uh-huh, yes. Not uh-huh, but yes. 19 Q. Did you hold any position in the national 20 unit? 21 A. No. 22 Q. Am I correct in understanding that the 23 rank and file received a regular medical
Page 18 1 A. I pay, you know -- 2 Q. You pay some of it, and they pay some of 3 it for the monthly premium? 4 A. Now? 5 Q. Yes. 6 A. I don't know if they do or not. I know I 7 do. 8 Q. Were you ever a member of the 9 International Chemical Workers' Local? 10 A. 125. I was president. 11 Q. You're the first guy who's had the number 12 right at the tip of his tongue, and being 13 the president, that would figure. Okay. 14 When were you president? 15 A. A couple of years, '69 to '70, I think. 16 Q. Did you hold any other positions when -- 17 A. I was a securer for several years. 18 Q. Okay. Tell me what your role was as 19 president of the local. What sort of 20 things did you do? 21 A. Well, you know, I kind of looked out for 22 the welfare of the hourly people. And 23 we'd have grievances and all of that sort	Page 20 1 examination? 2 A. Yes, annually. 3 Q. And did you avail yourself of that? Did 4 you have an annual physical out there? 5 A. You didn't have a choice. 6 Q. Okay. Tell me what you remember being 7 involved in that. 8 A. How did I remember being involved in the 9 physicals? 10 Q. What took place? What were the components 11 of that medical examination? 12 A. Oh. They would check your -- it was a 13 pretty complete physical. They'd do an 14 x-ray every year of the lungs. They'd do 15 a prostate exam. You know, regular stuff, 16 blood work. 17 Q. Ask you questions? 18 A. Blood pressure. 19 Q. Check your eyes, check your ears? 20 A. Yeah, I had a hearing test every year. 21 Q. Was that much of a problem out there at 22 that plant? You know, that was back when 23 we had a lot of railroaders who had

Page 21 1 hearing problems from working on the 2 railroad. 3 A. I had a hearing problem, but I got it from 4 the Marine Corps. I was a rifle range 5 coach for a while, and my ears started 6 ringing then. 7 Q. And I'm sure they didn't give you hearing 8 protection out on the range? 9 A. Not then. 10 Q. Yeah, right, not then. 11 A. And you could put cotton in your ears, but 12 they didn't have the -- 13 Q. And this was every year that you were out 14 at Monsanto? I mean, it was already in 15 place when you started working in '60? 16 A. The hearing test? 17 Q. Yeah, the whole -- the medical 18 examination? 19 A. Oh, yeah. 20 Q. And every year you were there, you had 21 one? 22 A. Every year for thirty-seven years. 23 Q. Okay. And I understand that was	Page 23 1 A. Well, they've hired a lot of new ones, so 2 it's not as many as it used to be. But 3 one of my good friends that I hang around 4 with all the time works there. 5 Q. Who would that be? 6 A. Wayne Carden. 7 Q. Wayne Carten? 8 A. C-a-r-d-e-n. 9 Q. Carden. Okay. And do you get the Bama 10 Briefs? 11 A. Yeah. 12 Q. Okay. I'm now ready to talk about what 13 you actually did there for Monsanto. And 14 I take it you started there in 1960 or 15 thereabouts? 16 A. March of '60. 17 Q. March of '60. What was the title of the 18 first position you held there? 19 A. The first job I started at was operator. 20 Q. And was that in a particular department of 21 the plant? 22 A. It was in the Aroclor department. 23 Q. And what did you do as an operator in the
Page 22 1 administered by the plant doctor and the 2 plant nurse? 3 A. Right, yes. Is right okay? 4 Q. Yes. Do you ever remember in thirty-seven 5 years them pointing something out to you 6 and saying, we found this out when we did 7 this, and you ought to know about it? 8 A. Just a hearing decrease. 9 Q. The hearing? 10 A. Yes. This sounds like -- I was over at 11 the VA a couple of weeks ago answering 12 some of the same questions trying to get 13 some hearing aids. 14 Q. Okay. And I assume it never cost you 15 anything for this? This was paid for by 16 Monsanto? 17 A. Absolutely. 18 Q. Having just retired about four years ago, 19 I'm presuming you may still have friends 20 and acquaintances who work at the 21 facility? 22 A. Yeah, I've still got a few out there. 23 Q. Would it be a handful or dozens?	Page 24 1 Aroclor department when you started there? 2 A. We just made, you know, different types of 3 Aroclor. It would be liquid or solid. 4 Q. I would assume that there were different 5 places one could work, different tasks 6 that you could be assigned, and that there 7 wasn't one operator in the Aroclor 8 department? 9 A. Well, I started out as a chlorinator 10 operator and moved on to still operator. 11 Q. Some fellows have discussed 12 cross-training, where you tried to learn 13 all of the different jobs in the 14 department? 15 A. You did. Yeah, I learned them all. 16 Q. Okay. Tell me about the waste streams 17 that you would have, stuff coming off of 18 that department that you know about. 19 A. Well, as far as -- of course, you'd have 20 drains on the bottom. 21 Q. Of the stills and the chlorinators, you 22 mean? 23 A. Well, just in the bottom floor of the

Page 25 1 department. 2 Q. Oh, okay. 3 A. Just like it is everywhere else. 4 Q. And if something got spilled, that would 5 be washed into the drain? 6 A. Yeah. And it would go into a pit outside, 7 and then, it would be cleaned out 8 occasionally. And then, any overflow, 9 basically clear stuff, would go to the 10 limestone pit. 11 Q. Right. The wastewater from that part of 12 the plant went to a limestone pit on the 13 east side of things? 14 A. Right, the east side of the plant. 15 Q. Okay. 16 A. And that filtered the rest of it out. 17 Q. Are you saying that you know that no PCB 18 was in that water as it left the plant 19 because of this pit that you've told us 20 about in the limestone, or that was your 21 assumption? 22 A. I didn't say that. I don't know. 23 Q. That's what I'm trying to get at.	Page 27 1 A. Yeah. 2 Q. A couple of hundred degrees centigrade, 3 depending upon what type you were making? 4 A. I'm not sure about the temperature, but 5 it -- 6 Q. It was hot, and you wouldn't want to touch 7 it -- 8 A. No. 9 Q. -- because it would burn you? 10 A. Yeah. 11 Q. And that stuff would be to cool, 12 obviously? 13 A. Sure. 14 Q. And it's going to be emitting some vapor 15 while it cools, correct? 16 A. Yeah. They were kind of closed up with 17 lids. They had a big lid on them. 18 Q. So you didn't need any ventilation 19 anywhere because you never had any fume 20 coming off of anything? 21 A. It seems like we had a -- some ventilation 22 fans. But I'm not -- that was forty-two 23 years ago.
Page 26 1 A. It was not supposed to be in it, you know, 2 because it was pretty well filtered. 3 There wasn't that much, you know, that 4 washed down that I thought. 5 Q. And what other sort of waste stream might 6 there be from this process of making 7 Aroclor? 8 A. That was it. 9 Q. Was there cooling water used? 10 A. Yeah. 11 Q. Any contact with that cooling water with 12 any sort of chlorinated biphenyl at any 13 point in the process? 14 A. When you say "cooling water," you don't -- 15 do you mean, like we used cooling water to 16 cool the stills? 17 Q. Right. 18 A. That never did hardly come in contact. 19 That was just cooling. It didn't come in 20 contact with -- 21 Q. What about vapors? When the product came 22 off of the still, I sense that it was 23 pretty hot?	Page 28 1 Q. What about the still bottoms? I've heard 2 people tell me about still bottoms as a 3 waste stream that came off the Aroclor 4 department. Do you ever remember -- 5 A. When you say "waste stream," what are you 6 talking about? 7 Q. I'm pretty simple when it comes to these 8 chemical plants. I like the black box 9 approach, which is the black box on the 10 paper, and you draw stuff going in and 11 stuff coming out. 12 A. Yeah, okay. 13 Q. And we can talk about what you do inside 14 the box, and I'm curious about that. 15 A. Yeah. 16 Q. But I also like the simplicity of what's 17 going in and what's coming out. So I 18 know, I think, what goes into the box of 19 the Aroclor department. It's biphenyl 20 from the biphenyl department? 21 A. Right. 22 Q. And chlorine from the chlorine department? 23 A. Right.

Page 29 1 Q. And some electricity and probably some 2 steam? 3 A. Right. 4 Q. And some cooling water? 5 A. Right. 6 Q. And that's about it. Coming out of the 7 department, you've got some Aroclor? 8 A. Right, which was pumped through tanks. 9 Q. You've got some muriatic acid? 10 A. (Witness nods head affirmatively.) 11 Q. You've got some wastewater, which may or 12 not have had some PCB in it? 13 A. Right. 14 Q. And you've got some -- 15 A. Bottoms. 16 Q. -- fume and some bottoms? 17 A. Right. 18 Q. Those are what I want to know about. If 19 there's more, I'd love for you to tell me. 20 A. You've pretty much got it. 21 Q. So do you have any idea if there was 22 anything done as far as controlling the 23 fume or trying to collect that fume, as	Page 31 1 kind of on the west side of things? 2 A. Yes. 3 Q. And they say lake, but I'm sure people 4 didn't take sailboats out there and go 5 swimming. This is like a pond, looked 6 like a farm pond? 7 A. Yeah. But it was, you know, mostly solid. 8 Q. Just some water there to kind of cool it 9 off? 10 A. Yeah, when it rained. 11 Q. I mean, you could have just as easily laid 12 it on the open ground. Why would you put 13 it in the lake, if you know? 14 A. I don't know. I know that they eventually 15 dug it up and put it -- we had a melting 16 pot over there. We would melt it up, and 17 they made another product off of it. 18 Q. Again, what I'm trying to find out is: 19 With these bottoms -- which would have had 20 some chlorinated biphenyl in it, correct? 21 A. I don't know. I assume. 22 Q. We're trying to figure out where that 23 went. So some of it, you think, got
Page 30 1 opposed to just venting it to the open 2 air? 3 A. Well, like I say, we had some -- 4 Q. Hoods? 5 A. Down at the bottom of the still on some of 6 the -- some of the products, you'd have 7 what we call drawing bottoms, which just 8 opened a valve, and it had a rotating arm 9 that would fill up a drum and seal it off 10 and let it cool for a few days. And then, 11 there was some -- it seems like I remember 12 a fan in that hood that would take care of 13 those fumes. 14 Q. Okay. 15 A. But I'm not sure about that. 16 Q. Do you know what was done with those 17 bottoms? 18 A. I know they were put out there to cool, 19 and they would harden. They'd be very 20 hard. And they either hauled them off, or 21 they carried them to a place we call 22 Klegorn's (phonetic) Lake. 23 Q. Now, I think I know where that is. That's	Page 32 1 drummed up and put into the landfills? 2 A. It could have possibly gone to the 3 landfill. They might have shipped it 4 to -- I can't think of the name of that 5 other place in Alabama that they carried 6 it. 7 Q. Emelle? 8 A. Yeah. I'm not sure about that, and that's 9 the reason I can't answer it. 10 Q. All right. 11 A. My memory is not as sharp as it used to 12 be. But the one -- up at Klegorn's 13 (phonetic) Lake, I mean, it would harden 14 immediately. It wasn't like it was just 15 out there bubbling and -- 16 Q. And that's -- so you would take some of 17 the bottoms over there. And again, that's 18 located within the fence line of the plant 19 on the west side of things? 20 A. Right. 21 Q. And then -- I guess we've covered all of 22 the waste streams that you know about. 23 How long did you work as an operator in

Page 33 1 the Aroclor department? 2 A. About five years. 3 Q. So at some point in 1965, I think you 4 went -- 5 A. I went from operator to chief operator in 6 that department. 7 Q. Okay. When did that happen? 8 A. I'm thinking '64 or '65 because I went to 9 maintenance right -- right along that 10 period. So I'd say -- I was probably 11 chief a year. 12 Q. And that would have been a promotion? 13 A. Yeah. 14 Q. And still doing shift work, but you're the 15 top operator for the shift that you're 16 there? 17 A. Right. 18 Q. What's the -- and that was still in 19 Aroclor? 20 A. Uh-huh, yes. 21 Q. And what's the next position that you held 22 with Monsanto? 23 A. I went to pipe fitter in the maintenance	Page 35 1 primary maintenance. 2 Q. Okay. 3 A. And there was a lot of construction going 4 on. 5 Q. Were there many occasions where pipes or 6 valves or fittings would break, and you'd 7 have to come repair those, as opposed to 8 preventive maintenance where you did it 9 before it broke? 10 A. No. It might plug, or cold weather would 11 cause it to crack, or a gasket would leak 12 or something like that. 13 Q. I'm assuming that if there was a rupture 14 or some sort of a leak, that cleaning up 15 whatever might spill from that was not 16 part of the pipe fitter's -- 17 A. Sometimes it was. 18 Q. Sometimes it was. And did that happen 19 sometimes when -- 20 A. Well -- 21 MR. MYERS: Let him finish his 22 question first. Okay? 23 Q. -- when Aroclor would leak or spill?
Page 34 1 department. 2 Q. And this would have been sort of 3 plant-wide? 4 A. Uh-uh, yes. 5 Q. And this was in 1965? 6 A. Yeah. 7 Q. '66, somewhere along in there? 8 A. Yes. 9 Q. And what would have been the reason for 10 you to go from being a chief operator to 11 pipe fitter? 12 A. Increase in pay and day shift. 13 Q. That's two good reasons. 14 A. Day shift probably. 15 Q. Tell me what your duties were as a pipe 16 fitter. 17 A. Well, we just, you know, fabricated pipe 18 and replaced pipe and cleaned out clogged 19 pipes and all of that stuff. 20 Q. Was there a lot of new equipment going on 21 line, a lot of new construction, or was it 22 more keeping what was already in place? 23 A. It was basically maintenance of the --	Page 36 1 A. We were plant-wide. I assume that -- I 2 know in parathion or -- that's where the 3 biggest plant was -- we did -- I worked 4 mostly in that section of the plant. 5 Q. All right. What's the next position that 6 you held with the company? 7 A. I did -- what they did back in -- I can't 8 remember the year. But they shut down -- 9 cut back on the parathion, so it was cut 10 back on maintenance. So I went -- I 11 volunteered to be a maintenance -- they 12 call it a maintenance operator, really. 13 But it was a good name for a laborer. But 14 it would allow me to stay on day shift and 15 start college and go to college. 16 Q. Was that plant-wide that you would -- 17 A. Plant-wide. 18 Q. Okay. Now, you said that that enabled you 19 to start college. So I'm guessing you 20 must have done that roughly in '71? 21 A. '70 or '71. I can't remember. 22 Q. So you were a pipe fitter for about five 23 years?

Page 37 1 A. Somewhere in that neighborhood. 2 Q. Okay. And what would you do as a 3 maintenance operator? 4 A. Everything. We just -- 5 Q. Just kind of like a utility infielder on a 6 baseball team, wherever they needed a warm 7 body? 8 A. We'd cut grass. We'd clean the rest rooms 9 and, you know, clean the building and -- 10 Q. Uh-huh (indicating yes). Let me -- 11 A. -- clean up pipe and carry it to the 12 decontamination pit. 13 Q. What was the decontamination pit? 14 A. That was where you carried things from 15 parathion. 16 Q. Okay. 17 A. And they had a big pit there that you'd -- 18 Q. That would neutralize the -- 19 A. Neutralize it. 20 Q. Okay. As a pipe fitter in the late '60s, 21 were you involved in putting together the 22 equipment for the expansion of the Aroclor 23 department?	Page 39 1 with Monsanto after you were a maintenance 2 operator? 3 A. Well, as soon as I got my degree, about a 4 month after I got it, they promoted me to 5 the night superintendent. 6 Q. And that would be for the entire plant, I 7 assume? 8 A. Uh-huh (indicating yes), on the off shifts 9 and weekends. We'd just supervise. They 10 had one person in the plant then that was 11 the night superintendent. There was four 12 of us. 13 Q. And you were basically the top person 14 there when you were there? 15 A. Yeah. 16 Q. Okay. Would one of your jobs as a 17 superintendent be to just occasionally do 18 a walk around the plant looking for signs 19 of things that might not be being done 20 right? 21 A. Sure. 22 Q. Would you do that every shift? 23 A. That was part of the job.
Page 38 1 A. I might have worked -- I remember working 2 over there doing some piping. 3 Q. I know you said you were primarily in 4 parathion. 5 A. Yeah. But we did some work over there 6 because I remember that -- 7 Q. It seems to me that one of the fellows 8 yesterday said that the expansion involved 9 bigger chlorinators and a tank. Those are 10 the two things that stand out in my mind. 11 Do you remember -- 12 A. That was part of the expansion, yes. 13 Q. Do you have any recollection of working on 14 either of those projects? 15 A. Yeah. 16 Q. He thought that was like maybe in 1969. 17 Do you have any feel for -- 18 A. I cannot remember the dates. 19 Q. Okay. 20 A. It was -- I just can't remember the dates. 21 It would have to be along in there 22 somewhere. 23 Q. Okay. What's the next job that you had	Page 40 1 Q. Okay. 2 A. Every department, every aspect of it. 3 Q. And as an example, if you were doing a 4 walk around, and you observed somebody 5 without a hard hat on, what would you do 6 about that? 7 A. Tell them to put it on. 8 Q. And if they said they didn't feel like 9 wearing a hard hat, what would you do? 10 A. They felt like it. 11 Q. Very good. 12 A. That was a requirement for the job. 13 Q. So if they didn't feel like it, they'd 14 have to find something else to do for a 15 living? 16 A. Yes. 17 Q. And if -- 18 A. You know, not one occasion. But they -- 19 but I never did have anybody question 20 wearing a hard hat. 21 Q. People wanted to be safe; isn't that a 22 fair statement, as a general proposition? 23 A. Yes.

Page 41 1 Q. Now, what if you were doing a walk around, 2 and you found a puddle of chemicals 3 sitting on the ground, what would you do? 4 A. Well, you know, you contact the chief 5 operator in each department. Generally, 6 they take care of it themselves. You 7 know, they're conscious about cleaning it 8 up. 9 Q. But you would want to see to it that that 10 was taken care of? 11 A. Oh, yeah, sure. 12 Q. In a fairly quick order? 13 A. Sure. 14 Q. And if you were walking around, and you 15 smelled something that you weren't used to 16 smelling at the plant, what would you do 17 about that? 18 A. We would inquire about it, you know, if it 19 was unusual. 20 Q. And what would you do if somebody came to 21 the plant and told you that they lived 22 nearby and they were smelling something or 23 seeing something that was unusual?	Page 43 1 Q. And if you found something leaking, be it 2 a barrel or a pipe or a tank or a pit, 3 that would be something that you would 4 expect to have addressed and have 5 addressed in a timely fashion? 6 A. Of course. 7 Q. Now, I assume y'all had a laboratory there 8 at the plant? 9 A. Uh-huh, yes. 10 Q. As the night superintendent or 11 superintendent -- is that the right word? 12 A. Night superintendent. 13 Q. -- night superintendent, I assume you had 14 people working in the lab even on the 15 night shift? 16 A. Right. 17 Q. So that if something was going on -- if 18 nothing else, just production, you had to 19 have somebody there to check the products 20 to make sure you were in specifications? 21 A. Oh, yeah. 22 Q. And part of your bailiwick would be the 23 lab, then, for those eight hours?
Page 42 1 A. If they came to the plant? 2 Q. Yeah. If you got word somehow, somehow 3 that there was something outside the fence 4 line -- 5 A. Yeah. Okay. When we were night 6 superintendents, you know, occasionally, 7 we would get what we call odor complaints 8 from the parathion. And we were told by 9 supervision to go where these people lived 10 that they complained from and go every 11 time to where they lived and try to detect 12 odors. 13 Q. To see what it was? 14 A. Yeah. And sometimes, people would be out 15 there and talk to you. But it was -- we'd 16 handle it, report it, and leave a memo. 17 We just -- if we ever smelled anything, a 18 lot of times, it just -- they were 19 smelling it, and we weren't. But it was 20 thoroughly investigated. And the next 21 day, our report would go to the 22 environmental people, and they would check 23 it out.	Page 44 1 A. Right. 2 Q. Okay. Now, did you ever have occasion in 3 doing your walk around to see a situation 4 involving a release of something getting 5 off of the plant site? 6 A. I can't remember any. 7 Q. Okay. What's the next position that you 8 held with the company? 9 A. Well, they completely shut down parathion 10 this time. And they cut out the night 11 superintendents, so I went back -- my 12 major was in accounting, and I went to the 13 accounting department and did accounting 14 there for -- I don't know. It was about a 15 year, probably. And then, my final job 16 was when they -- we had a full-time -- 17 Q. Well, let me stop you here for a second. 18 I'm assuming in '75 when you graduated and 19 moved tonight superintendent, you ceased 20 being a member of the union, and you 21 became management? 22 A. Right. 23 Q. Salary -- when you went to the accounting

Page 45 1 department, you were still a salary 2 employee, I assume? 3 A. Yes. 4 Q. Do you recall roughly when that happened? 5 A. '86. 6 Q. '86. And that was due to downsizing. And 7 what sort of things were you handling in 8 the accounting department? Did you have a 9 particular area that you worked? 10 A. Well, I did primarily some cost 11 accounting, and I was in charge of plant 12 utilities and allocating everything in 13 different departments. 14 Q. And I've seen some paperwork that would 15 lead me to conclude that Monsanto was 16 pretty rigorous, to use a nice word, about 17 keeping track of how many pennies of 18 electricity they spent to make a gallon of 19 Aroclor and how many pennies of lead they 20 used to make a batch of biphenyl and so on 21 and so forth. I mean, they knew all of 22 these things that were flowing into the 23 box and all that was coming out?	Page 47 1 of particular products? 2 A. Right. 3 Q. Okay. And then, you said you went to your 4 last job, which was what? 5 A. Well, like I was saying, I was in 6 accounting. I was still in the same area 7 there, but we had an information 8 technology guy that was -- you know, he 9 was -- that was his major and all of that. 10 And the plant got so small, and they 11 transferred him to another plant. And 12 instead of bringing in another one, they 13 trained me to do that. And that's what I 14 did until I retired. I was in charge of 15 all of the computers in the plant. 16 Q. And when did you start as the IT guy? 17 A. I'd say somewhere around '87 or '88 until 18 '97. 19 Q. Okay. Did you have any involvement as the 20 IT staff person with archiving records? 21 A. Well, we saved, you know, everything on 22 our -- I think the computer in the main 23 frame -- those that could, and a lot of
Page 46 1 A. Most corporations do. Monsanto was -- 2 they were vigorous there and in a lot of 3 other areas, like safety and housekeeping. 4 Q. Safety and housekeeping. You, as a cost 5 accountant, what you were doing is, for 6 instance, taking the electric bill and 7 figuring out where are we using this 8 electricity and -- 9 A. Right. 10 Q. -- putting it with the different products? 11 A. Yes. 12 Q. And if I understood some testimony I got 13 earlier in the week, there were daily, if 14 not hourly, meter readings recorded? 15 A. Yeah. That's where we got our information 16 from. 17 Q. And that's what you'd do? You'd take 18 those meter readings, and -- 19 A. Right. 20 Q. -- you'd know where that electricity had 21 gone? Because Monsanto was spending money 22 for that, and they wanted to know how to 23 account for it and put it towards the cost	Page 48 1 paperwork was archived in boxes. 2 Q. Was it kept there at the plant 3 historically? 4 A. Most of it was there, I'm pretty sure. 5 And, of course, they kept some of it 6 off-site in case of a fire, but I don't 7 know where. 8 Q. Okay. Let me talk to you for a moment 9 about the contact you may have had 10 physically with Aroclor or PCB or Montars, 11 all of which I understand are somewhat 12 synonymous terms for the same stuff? 13 A. Yeah. 14 Q. Tell me when you might have physically 15 come into contact with that stuff. 16 A. From '60 to '65, and maybe a little, you 17 know, in pipe fitting. I don't know. 18 Q. And what's the -- if you had to sit here 19 and describe to somebody how you would 20 have come into contact with it as an 21 operator, just describe for somebody how 22 it would get on you. 23 A. Well, you know, when you make Aroclor --

Page 49 1 well, I'm not going to get into how we 2 make it. You probably already know 3 anyhow. But we take samples on a regular 4 basis to check to see when it finished. 5 And it was to clean up and all of that, 6 empty buckets. 7 Q. When you're drawing a sample, you're 8 taking it out the reactor vessel, right -- 9 the still? 10 A. Yeah, the valve there, and you just pour 11 it into a flask and -- 12 Q. But I'm assuming it's coming out at 13 temperature? 14 A. Right. 15 Q. And you would not draw very many samples 16 and let it hit your skin before you 17 learned not to let it hit your skin? 18 A. Well, it was hot, yeah. 19 Q. I mean, you weren't really getting it on 20 you when you did that? 21 A. You weren't supposed to get it on you. I 22 mean, you had on gloves and all. 23 Q. So even when you were an operator in the	Page 51 1 coveralls, basically? 2 A. They provided everything. 3 Q. So you were basically covered head to toe? 4 A. Right. 5 Q. And as a chief operator, if you were 6 working in your Aroclor department, and 7 somebody wasn't using the appropriate 8 equipment, you would have said something 9 to them, I presume? 10 A. Right. That was one thing Monsanto was 11 very big was on was safety and 12 housekeeping. That was a big priority. 13 They didn't tolerate it. 14 Q. They didn't want their workforce getting 15 hurt? 16 A. Getting hurt or any other -- 17 Q. And you were -- you had facilities for you 18 to wash up before you went home, and you 19 changed back into your clothes? 20 A. Oh, yeah. 21 Q. And you'd leave the dirty clothes there? 22 A. Leave the clothes there, and they had free 23 laundry, you know. And we had our own
Page 50 1 Aroclor department, you wouldn't have had 2 a lot of exposure to Aroclor; isn't that a 3 fair statement? 4 A. I would say we had a fair amount of 5 exposure. 6 Q. And that's what I'm trying to find out. 7 And I don't understand how when you draw a 8 sample -- 9 A. Well, that wasn't the only thing you did. 10 You cleaned up, and you got empty buckets 11 sometimes and -- 12 Q. Okay. 13 A. And then, on the stills, you'd have to 14 sample that and -- 15 Q. Okay. Tell me about -- you mentioned a 16 second ago about having gloves on and 17 such. What sort of personal protective 18 equipment did you routinely use as an 19 Aroclor operator? 20 A. We had on, of course, a hard hat, safety 21 glasses, safety shoes, gloves, sometimes 22 face shields. 23 Q. And as I understand it, they provided	Page 52 1 bathhouse where we'd shower, and they 2 furnished soap, showers. 3 Q. Somebody was telling me that they thought 4 there was even bottled water there at the 5 plant at some point in time. 6 A. That, I don't remember. 7 Q. Don't remember? 8 A. No. 9 Q. Okay. 10 A. Bottled water wasn't even out there, as 11 far as I know. 12 Q. Were you allowed to eat or smoke in the 13 department around the Aroclor? 14 A. We had our own, you know, little lunchroom 15 or whatever you want to you call it. But 16 I recall people smoking in the control 17 room, yeah. 18 Q. Was there Aroclor in the control room? 19 A. Basically, you just had your instrument. 20 You would bring Aroclor in there to, you 21 know, stir your samples and all of that in 22 a sink. 23 Q. Okay. Tell me what kind of information

Page 53 1 you were provided when you started there 2 as an operator in the Aroclor department 3 about the toxicity of this product you 4 were making. 5 MR. MYERS: Object to the form. You 6 can answer. I just objected to 7 his question, but you can answer 8 his question. 9 A. Well, when you start to work at a chemical 10 plant, they make you aware of all of the, 11 you know, dangers and hazards. 12 Q. I understand. That's what I'm asking. 13 And if you would, tell me what you 14 understood they were with respect to 15 Aroclor. 16 A. Well, that was a long time ago, but, you 17 know, they told us about the hazards of 18 it. 19 Q. To pick a crazy example, I'm assuming they 20 didn't tell you that if you put your hand 21 in Aroclor, you'd wind up with eight 22 fingers? 23 A. No. They told us if you put your hand in	Page 55 1 document, and I want to ask you if you 2 knew this when you started working with 3 this stuff. 4 A. Okay. 5 Q. "Experimental work in animals shows that 6 prolonged exposure to Aroclor vapors 7 evolved at high temperatures or by 8 repeated oral ingestion will lead to 9 systemic toxic effects. Repeated bodily 10 contact with the liquid Aroclors may lead 11 to an acne-form skin eruption." Is that 12 anything you knew back when you were 13 working with it? 14 MR. MYERS: Object to the form. 15 Tell him if you know, if you can 16 answer it. 17 A. I've never seen that before. 18 Q. Okay. Now, it goes on to say in the next 19 paragraph: "Suitable draft ventilation to 20 control the vapors evolved at elevated 21 temperatures, as well as protection by 22 suitable garments from extensive bodily 23 contact with the liquid Aroclors, should
Page 54 1 it, you'd get burned. But they didn't 2 have to tell you that because common sense 3 told you that. 4 Q. Right. And that's what I'm trying to find 5 out. What beyond common sense and what 6 beyond don't touch stuff that's hot, and 7 don't get something on you that you don't 8 have to get on you -- what beyond that 9 common sense level, if anything, were you 10 told about this specific chemical? 11 A. The fact that -- I think it was -- this 12 specific chemical, I don't remember, to be 13 truthful with you. I just know that they 14 made us all very aware of the dangers of a 15 chemical plant. You know, some products 16 can explode, and some can burn you like 17 that. 18 Q. Did you have any reason to think that 19 Aroclor was explosive? 20 A. No. I knew it would burn. I knew 21 biphenyl would. And I knew benzene, of 22 course, was very flammable. 23 Q. Let me read you something here from an old	Page 56 1 prevent any untoward effects." Now, you 2 had that, correct? 3 MR. MYERS: Same objection. 4 A. Right. We had long-sleeved clothing, you 5 know, the whole works, and ventilation. 6 Q. Have you subsequently learned anything 7 about the specific concerns that some 8 people in the scientific community have 9 about what PCBs can do to people? 10 MR. MYERS: Let me object to the 11 form and ask: Subsequent to when 12 he worked in the department or 13 since his retirement? 14 Q. Since you were in the department. 15 A. When I was in the department of Aroclor? 16 Q. Yeah. 17 A. Never heard it until recently, you know, 18 when I've been reading all of this. 19 Q. Okay. If I asked you when -- have you 20 ever heard -- let's start with something 21 easy. 22 Have you ever heard allegations 23 about PCBs causing problems for people

Page 57 1 with their skin, other than what I just 2 read to you? Before that, had you 3 heard -- 4 A. No is the answer because I worked there 5 for thirty-seven years, and I never knew 6 of anybody out there having any problems 7 with their skin. And we were in contact 8 with it daily, around the clock. 9 Q. So you had people working in it 10 twenty-four hours a day? 11 A. Well, they wouldn't work twenty-four. 12 Q. They would get cleaned up and go home? 13 A. We worked seven twenty-fours is what we 14 did. 15 Q. But I'm saying: No individual worked 16 twenty-four seven? 17 A. No. 18 Q. But they worked forty hours? 19 A. We had four groups that rotated around the 20 clock, seven days a week. 21 Q. Yeah. Ever heard anything about that PCBs 22 cause problems with people's livers? 23 MR. MYERS: Object to the form.	Page 59 1 A. I've never heard that, except what I've 2 read in the recent years about the rats or 3 whatever that was. 4 Q. Okay. About rats. And you're convinced 5 that it couldn't cause problems in people 6 because you've never seen it in people out 7 at the plant? 8 MR. MYERS: Object to the form. 9 That's not what he said. 10 Q. Well, then, you tell me: How is it that 11 you know that it can't possibly cause 12 these problems in people? 13 A. I've been basing it on my experience and 14 the people I worked with for thirty-seven 15 years. 16 Q. Tell me what the drainage ditches looked 17 like outside the plant where water would 18 flow away from the facility. 19 MR. MYERS: At what point? 20 Q. At any point that you have personal 21 knowledge. 22 A. Clear. 23 Q. Clear? Okay. Any kind of life in the
Page 58 1 Tell him if you know. 2 A. No. I've not heard of anything that -- 3 Q. As you sit here today -- 4 A. You've named off all of that, but I've 5 never heard of anything from anybody at 6 Monsanto in thirty-seven years being sick 7 over PCBs. 8 Q. That wasn't my question. 9 A. Okay. What was it? 10 Q. My question was: Did anybody ever -- 11 you're sitting here today in 2002, and 12 you're saying you've never heard anything 13 suggesting that PCBs could cause liver 14 problems in people? 15 MR. MYERS: He wants to know if 16 you've ever heard that. 17 A. I've never heard that. The only thing 18 I've heard is just what I've told you. 19 The rash, I read in the Anniston Star or 20 whatever. 21 Q. Okay. What about the fact that some 22 people think they cause cancer in people? 23 MR. MYERS: Same objection.	Page 60 1 ditches? 2 A. Any kind of what? 3 Q. Life. Minnows, frogs? 4 A. I never did really look for fish or 5 anything in there. 6 Q. Okay. 7 A. I'm assuming they were there. 8 Q. Was it your perspective that when you 9 would do walk arounds at the plant and 10 look at these ditches that as long as they 11 were running clear, there wasn't a 12 problem? 13 A. We also sampled them on a pretty regular 14 basis when I was night superintendent to 15 make sure that they were clean. The 16 people from the lab would do that. 17 Q. What were the levels of PCB in the east 18 ditch as it left the plant in 1975 when 19 you were serving as night superintendent? 20 A. I don't know. 21 Q. Do you know if it was sampled for? 22 A. I know that the lab was sampling all of 23 the ditches on a regular basis just for

Page 61 1 environmental protection. But I didn't -- 2 you know, I never did go to the lab and 3 say, well, what did you find out and what 4 was -- all of their information went to 5 someone else. 6 Q. Have you ever heard of a professor named 7 Denzel Ferguson from Mississippi State 8 University? 9 A. No. 10 Q. Heard anything about the study that he was 11 hired by Monsanto to do of the waters 12 coming off of the plant? 13 A. Sure didn't. 14 Q. If you had been night superintendent and 15 received a report that the wastewater 16 coming out of the plant killed fish within 17 a matter of minutes, that it was toxic to 18 fish, even in a thousand-to-one dilution, 19 that it posed a danger to children and 20 animals downstream, would you, as night 21 superintendent, have taken steps to clean 22 up that waste stream? 23 MR. MYERS: Object to the form.	Page 63 1 and they'd take care of it immediately. 2 If there was something that I could do, of 3 course. 4 Q. Let me ask you to tell me why you say 5 Monsanto was keenly aware of these things? 6 A. No. I didn't say that. I said Monsanto 7 was on top of anything that -- any kind of 8 release or exposure, and they took care of 9 that in a professional manner. 10 Q. And why do you say that? 11 A. Because I saw it happen, you know. 12 Q. Tell me about it. I don't know it, and I 13 need you to tell me. I literally don't 14 know about that. 15 A. I know one time when -- I think it was 16 Santowax or biphenyl -- there was a line 17 that ruptured. That's what it was. And 18 it released some smoke into the air and 19 across the highway, and they were on top 20 of that just within minutes. 21 Q. When was that? 22 A. It was harmless, but it -- oh, I don't 23 know. It was in the late -- I'd say in
Page 62 1 A. I never did run into that. I wouldn't 2 have believed it. 3 Q. All right. Again, what I'm asking you for 4 the sake of this question is to assume 5 that Monsanto -- not some plaintiff's 6 lawyer, but Monsanto hired a professor to 7 come in and test this wastewater, and he 8 reported back to Monsanto in writing that 9 it had these effects, and that came back 10 to you as a night superintendent, would 11 you have felt some obligation to take some 12 action? 13 MR. MYERS: Object to the form. 14 A. If it came directly to me from him; is 15 that what you're saying? 16 Q. No. If you were made aware of these 17 facts -- or would that just have been 18 something you couldn't have done anything 19 about? 20 MR. MYERS: Object to the form. 21 A. Well, it would have been handled by 22 Monsanto, first of all, because they were 23 keenly aware of any situation like that,	Page 64 1 the '90s sometime. But that was one -- 2 the wind was blowing just right that it 3 was going across the highway, and it kind 4 of was -- it looked like white. And they 5 just wanted to clean it up. Or if they 6 had a -- 7 Q. Isn't it true -- 8 MR. MYERS: Let him finish. 9 A. Yeah. They would secure the area and have 10 someone up there. And any -- 11 Q. I'm sorry. When -- they would secure what 12 area when what happened? 13 A. What we were just talking about. 14 Q. Oh, with these -- 15 A. Yeah. 16 Q. Because that happened repeatedly, didn't 17 it? 18 MR. MYERS: Object to the form. 19 A. No, it didn't happen repeatedly. 20 Q. So if there's a memo in the record of this 21 case talking about this fog drifting 22 across 202 repeatedly where people can't 23 even drive down 202, that document must

Page 65 1 be -- a Monsanto document, by the way -- 2 that document must be in error -- 3 MR. MYERS: Object to the form. 4 Q. -- because it only happened once? 5 A. I didn't -- 6 MR. MYERS: Hold on a second. You 7 don't have to accept what he says 8 as true. 9 Q. And I told you that at the very beginning 10 of the deposition. 11 A. What I'm telling you is what I witnessed 12 the one time. 13 Q. Okay. 14 A. You know, I don't think it happened on a 15 regular basis. They were up there, and 16 any residue that was left, they'd clean it 17 up. And they'd even put it in a drum and 18 secure it and handle it in the proper way. 19 Monsanto was always -- they looked out for 20 the community and their employees. 21 Q. And I'm asking you to tell me why somebody 22 should believe you when you say that. And 23 I'm not saying you're lying. I believe	Page 67 1 odor complaints or anything like that, to 2 go out to where the complaint came from 3 and check it out and report details on 4 what -- if we detect any odor or if it was 5 legit, to talk to the people, if they were 6 there. And I think they felt 7 responsibility, and they gave a lot to the 8 communities around too, you know, as far 9 as monetary, schools and everything. It's 10 not like -- well, I guess, in your case, 11 you think they're an irresponsible bunch, 12 but I know better. 13 Q. When did they clean up Snow Creek? 14 A. When did they clean it up? 15 Q. Yeah. 16 A. You're talking about for PCBs? 17 Q. Yeah. 18 MR. MYERS: Object to the form. 19 A. It was in the late '90s, I guess. You're 20 talking about recently, that cleanup? 21 Q. Just whatever you know about it. 22 MR. MYERS: If you know, tell him. 23 Q. If you know. Don't -- if you don't know,
Page 66 1 that you believe that. But I want you to 2 explain to me why a jury should believe 3 that Monsanto looked out for the 4 community. 5 MR. MYERS: Wait a second. Let me 6 object to the form of the 7 question. He's not required to 8 answer what a jury should or 9 should not believe. I object to 10 the form of the question. And 11 he's told you because he observed 12 it. 13 MR. CUNNINGHAM: He hasn't told me 14 what he observed other than one 15 thing. 16 Q. You've told me about one incident in the 17 '90s. I'm asking you, please, to tell me 18 what information you know of from personal 19 observation that leads you to conclude 20 that Monsanto cared about the community 21 and took care of it? 22 A. Because, as I told you earlier, as a night 23 superintendent, we were told that with any	Page 68 1 that's fine. 2 A. I don't know the exact date. 3 Q. When did they learn that Snow Creek was 4 contaminated? 5 MR. MYERS: Object to the form. 6 A. See, you're talking about -- you need to 7 talk to the higher-ups to find that out. 8 Q. Okay. 9 A. In the '90s, when I was working on 10 computers, I had nothing to do with the 11 plant outside, except, you know, going out 12 and changing out computers and doing 13 maintenance on them. You already know the 14 answers, I'm sure, but I don't. 15 Q. I'm just trying to find out what you know. 16 And the facts are, if I'm understanding 17 correctly, that you really don't know when 18 they learned that Snow Creek might be 19 contaminated, and you don't know when they 20 cleaned it up? 21 A. I know approximately, and, you know, 22 that's what I told you. That's pretty 23 obvious if you get the paper and if you

Page 69 1 believe everything you read in the Star, 2 but I don't. But that's another story. 3 Q. Don't get me started on the Star. What 4 about Choccolocco Creek? Do you have any 5 personal information or knowledge about 6 the condition of Choccolocco Creek? 7 MR. MYERS: When? 8 Q. At any point in time, relative to PCB 9 contamination. 10 MR. MYERS: Object to the form. 11 A. Just what I read in the paper. 12 Q. Have you ever gone fishing in Choccolocco 13 Creek? 14 A. No. 15 Q. Do you fish? 16 A. No. 17 Q. Did you ever eat fish that were caught in 18 Choccolocco Creek? 19 A. I don't think so. I don't know. 20 Q. Do you know that there's a fishing 21 advisory for Choccolocco Creek, that 22 people aren't supposed to eat fish they 23 catch there -- beneath Snow Creek, anyway,	Page 71 1 A. I wouldn't have a clue. I went up there 2 to visit the computer department at the 3 plant. 4 Q. What is your serum PCB level, Mr. Cambron? 5 A. I don't know. They tested it out at the 6 plant, and I think it was in the nineties. 7 Q. You don't remember what your reading was? 8 A. I can't remember. It was on the high 9 side, I think. 10 Q. Do you recall why your blood got tested? 11 A. Well, they tested a lot of people, you 12 know. 13 Q. It was voluntary, as I understand it? 14 A. Yeah. In fact, I think Monsanto initiated 15 it. It might have been Solutia then. 16 Q. Mr. Chattam -- I don't know if you know 17 Mr. Chattam. I think he's one guy in 18 particular who still works out there. 19 He's a black gentleman. 20 A. Chatman? 21 Q. Chatman. I'm sorry. You're right. He 22 suggested that that had been done at the 23 request of the union.
Page 70 1 because of concerns about PCBs? 2 A. (Witness shakes head negatively.) 3 Q. Didn't know that? 4 A. No. 5 Q. Do you recall ever participating in a 6 study of worker mortality at the Anniston 7 plant, basically trying to look at people 8 who worked there and how many of them died 9 versus how many of them were alive? 10 MR. MYERS: Object to the form. 11 A. I don't ever recall that. 12 Q. Do you ever recall hearing about a study 13 like that done on Aroclor workers at the 14 Krummrich plant in Sauget, Illinois? 15 MR. MYERS: Object to the form. 16 A. I heard something about a study they did 17 up there. 18 Q. Did you ever visit the Krummrich plant? 19 A. Yeah. 20 Q. If I wanted to talk to you about how they 21 made Aroclor versus how you did it down 22 here in Anniston, how they handled their 23 waste streams, how the workers --	Page 72 1 A. I don't recall. 2 Q. Could be; might not be? You just don't 3 know? 4 A. Could have been and could not have been. 5 I just don't know. 6 Q. By that point, you were kind of working 7 with the computers, as you say? 8 A. Yeah, at that point. 9 Q. And not getting out and about as much in 10 the plant? 11 A. Right. 12 Q. Now, you elected to have your blood 13 tested, correct? 14 A. I what? 15 Q. You chose to have them test your blood? 16 A. Yeah. I think -- I can't remember if it 17 was -- if you asked for it, or they just 18 gave out a list saying you need to have it 19 tested. 20 Q. Were you curious? 21 A. Was I what? 22 Q. Were you curious to know? 23 A. I never did really think about it that

Page 73 1 much. I guess I was. I don't remember. 2 Q. What sort of follow-up took place? In 3 other words, after the blood got tested, 4 what happened then? 5 A. They just told us what it was, told us the 6 results. But I can't remember that. 7 Q. Do you remember -- 8 A. And then, they had a meeting. 9 Q. I'm sorry. Before you go to the meeting, 10 you said "they" told you. Do you recall 11 who they is? 12 A. I know it was some experts from -- I think 13 it was -- I don't know. I don't know 14 whether they were with the environmental 15 people or Monsanto. I keep wanting to 16 think it was Monsanto, but I'm not sure. 17 Q. Fair enough. And then, you were getting 18 ready to tell me about a meeting, and I 19 cut you off. 20 A. Well, they just had a meeting to tell us 21 what it was all about it, and that was it. 22 Q. I have seen a -- basically, a typed 23 transcript of a question and answer	Page 75 1 treatment, and the southern plant didn't 2 get any because we made the same thing 3 that Krummrich did. 4 MR. CUNNINGHAM: We'll make this 5 Exhibit One to his deposition. 6 (Plaintiffs' Exhibit Number 7 One was marked for 8 identification and attached 9 as an exhibit hereto.) 10 Q. Were you ever given an explanation that 11 you can remember that was satisfactory to 12 you as to why they tested the folks up 13 north but not at the southern plant? 14 MR. MYERS: Object to the form. 15 They did test them at the 16 southern plant. 17 MR. CUNNINGHAM: He's talking about 18 back in the '70s. 19 A. Yeah. That's the only thing that bothered 20 me, was the difference between how they 21 treated St. Louis and then Anniston. It 22 wasn't the fact that I was concerned 23 about --
Page 74 1 session. And I've highlighted on here 2 some that say "Cambron." It looks like 3 some of the questions are being asked by 4 Cambron. And I'm going to ask you to take 5 a moment and read this and see if that -- 6 A. Just read what I asked? 7 Q. Well, the whole thing, if you want. I 8 don't care. You might read the whole 9 thing and see if it helps you remember the 10 meeting -- if that's the meeting you're 11 talking about. 12 And how old are you, Mr. Cambron? 13 A. Sixty-two, nearly sixty-three. 14 Q. Okay. 15 A. Yeah, that was the -- 16 Q. Okay. And according to this, you asked 17 the question: "Why is Monsanto just now 18 making these studies?" 19 A. Well, my primary concern was the -- it 20 wasn't why were they just now, but why 21 they had tested up north and not where 22 everybody had made it. I was kind of 23 wondering why they got preferential	Page 76 1 Q. When they started? If you're going to 2 start, start it at both places, basically? 3 A. Right. 4 Q. Yeah. Now, when they drew that blood, 5 they had everybody fill out a 6 questionnaire. And I've been trying to 7 figure out -- they haven't told us who 8 those folks are to protect your privacy. 9 It's just by an ID number. And I'm going 10 to try to figure out, based on your age 11 and how many years you worked there, which 12 one of these might be you. 13 In 1996, when these samples were 14 drawn -- in June of 1996, how old would 15 you have been? 16 A. In '96, I would have been about 17 fifty-seven. 18 Q. Okay. Let's go through a few here and see 19 if we can find yours. See if that might 20 be you (indicating). 21 A. Well, it sounds like me. 22 Q. Okay. That's number ten ten? 23 A. Let's see here. That's not my writing,

Page 77 1 but somebody else might have done it. 2 Q. Well, let me take a -- what about the 3 height and the weight? Is that what you 4 think of yourself as being height and 5 weight wise? 6 A. Well, that's about -- that's my height. 7 My weight -- I always think I weighed 8 about a hundred and sixty, but I know it's 9 not that. 10 MR. MYERS: All of these are in the 11 same hand, aren't they? 12 MR. CUNNINGHAM: A lot of them are. 13 That's why I think -- 14 THE WITNESS: They might have just 15 asked the questions and written 16 it themselves. 17 Q. If you are number ten ten, the blood 18 result that I have been provided for ten 19 ten is sixty-six ppb. Now, you had 20 indicated you recalled it being on the 21 high side? 22 A. I remember it being a six something. 23 Q. So this is probably you, then.	Page 79 1 about a guy with liver abnormalities? 2 A. I remember the meeting, but I don't 3 remember the -- 4 Q. The meeting, in the sense that there was a 5 meeting to talk about the fact that 6 someone had come down with liver problems? 7 A. No. I didn't hear the liver. I heard -- 8 I heard somebody -- I don't remember -- 9 said they had some kind of rash, but it 10 didn't last. 11 Q. Another guy said he carried melted PCB to 12 the dump. Do you recall who was doing 13 that kind of work? 14 A. No. Probably the -- 15 Q. I'm sorry. What was the answer? 16 A. No was the answer, but -- no, I don't know 17 who. 18 Q. Okay. Lab work doing air samples. Do you 19 have a specific recollection of an 20 individual who was working in the lab on 21 air samples? 22 A. On air samples? 23 Q. Uh-huh (indicating yes).
Page 78 1 Now, there were some comments on 2 some of these questionnaires. And I don't 3 know if you can help me figure out who 4 some of these people are or not, but I'm 5 going to run these comments by you, and 6 see if that rings a bell as to who did 7 that or had that. Okay? One of them 8 mentioned that he has chloracne 9 frequently. I just know it's number one 10 oh oh six, but he put on his comment that 11 he has chloracne frequently. Do you 12 recall who at the plant had chloracne 13 frequently? 14 A. No. 15 Q. There's another fellow who put down a rash 16 on arms and hands. Do you recall any of 17 the fellows out there having rashes on 18 their arms and hands? 19 A. I really didn't -- you know, I didn't keep 20 up with anybody's illnesses. 21 Q. Another fellow said he had an abnormal 22 liver test five years ago, and that would 23 have been 1991. Do you remember anything	Page 80 1 A. It could have been many of them. I don't 2 know. 3 Q. Okay. Did you ever have any involvement 4 with operating any of the incinerators 5 there at the plant? 6 A. Just as night superintendent. 7 Q. Would have fallen into your bailiwick, so 8 to speak? 9 A. Yes. 10 Q. Do you know what went into the parathion 11 incinerator? 12 MR. MYERS: Working as the night 13 superintendent? 14 Q. I'm assuming you don't know about it any 15 other -- 16 A. Well, actually, it was when I was in 17 maintenance. 18 Q. As a pipe fitter? 19 A. When I got to be night superintendent, 20 they cut that out. 21 Q. They had gone to the recycle? 22 A. Recycle, that's right. 23 Q. That's right; that's right.

Page 81 1 A. In maintenance, I changed out, you know, 2 burners to it and everything. 3 Q. My sense is, although I don't know that 4 I've got this nailed down yet from 5 anybody, that bottoms from one of the 6 parathion processes -- 7 A. Yeah, sulfur. 8 Q. And what about the tepee up on the 9 landfill? Was that around at any point 10 when you had occasion to be up there and 11 see it? 12 A. I saw it, but I was never involved in 13 that. 14 Q. Okay. Were you at all involved with when 15 they stopped selling Aroclor and making 16 it, for that matter -- in the early '70s, 17 Monsanto had a program in place to take 18 back scrap from the customers and 19 incinerate that in Sauget? 20 A. No. 21 Q. You don't know anything about that? 22 A. I don't know nothing about that. 23 Q. We've seen some documents that suggest	Page 83 1 A. It was just a huge area there that had -- 2 it was just like a typical landfill, you 3 know. It had -- we'd carry -- we'd pick 4 up, you know, paper and wood. 5 Q. Would you take those kinds of things to 6 the tepee to burn them, or would you burn 7 them in the pit? 8 A. No. We'd just carry them up there, and 9 they'd cover them up with bulldozers. 10 Q. Who's "they"? 11 A. It was a contracting firm. I can't 12 remember who it was. 13 Q. Okay. All right. And was it one big pit 14 or various pits or -- 15 A. Various areas. You know, they'd cover up 16 one, and they'd go to the next. 17 Q. So they had one operating face at any one 18 time where you would dump stuff until that 19 got full, and then, they'd start somewhere 20 else? 21 A. Right. As soon as we'd dump it, of 22 course, they'd come in there and cover it 23 up.
Page 82 1 that Anniston was like a collection point 2 for some of that. When you were night 3 superintendent in '75, do you ever 4 remember stuff coming back to the plant 5 that y'all had stored for a while for -- 6 A. Not on -- I didn't notice it. 7 Q. If I wanted to talk about the condition of 8 the dump or the landfill south of the 9 plant across 202, were you ever up there 10 to see it to know what it looked like? 11 A. Yeah. 12 Q. Tell me when you would have had occasion 13 to be up there. 14 A. I went up there as a maintenance operator, 15 laborer. Sometimes we carried trash up 16 there, you know. 17 Q. And that would have been in the time frame 18 of '70-'71? 19 A. Somewhere in that neighborhood. 20 Q. Okay. Tell me what it looked like when 21 you were up there. 22 A. What it looked like? 23 Q. Yes.	Page 84 1 Q. Okay. What about ponded water? Did you 2 ever see ponded water up there? 3 A. You mean, water laying in the pits? 4 Q. Yes, sir. 5 A. Rainwater and -- 6 Q. Water of any kind. I mean, I don't know 7 how you'd tell what's rainwater and what's 8 not. But if you can, let me know where it 9 came from? 10 A. We didn't pump water up there or anything. 11 But I'm assuming when it rained, there was 12 water in there. 13 Q. And I think that's a logical assumption. 14 I'm just wondering, since you were 15 actually up there and saw it, do you have 16 a recollection as you sit here today of 17 seeing ponded water in the pit? 18 A. No recollection of it. 19 Q. Okay. When you were an operator and chief 20 operator in the Aroclor department, did 21 you ever have a batch that just couldn't 22 fit within the specifications, and you 23 just couldn't get it right?

1 A. I can't remember any.
 2 Q. You mentioned before about the testing
 3 that took place for the wastewater
 4 streams, and you said that happened daily,
 5 as I recall?
 6 A. Yeah, by the lab.
 7 Q. What role, if any, did you have in picking
 8 up samples, be it of water, soil, fish,
 9 air, other than the product itself, is
 10 what I'm looking for?
 11 A. Did I pick up samples?
 12 Q. Right. Did you have any role in either
 13 collecting the samples, analyzing the
 14 samples, supervising people doing either
 15 of those things?
 16 A. Well, on night shift, we was in charge of
 17 everybody at the plant. But the lab
 18 was -- you know, they were kind of a
 19 different breed of cat, and they did their
 20 job.
 21 Q. As we sit here, I'm presuming from what
 22 you --
 23 A. I didn't go over there and say -- you

1 know, because I didn't really know, so --
 2 Q. And that's what I'm getting at. You
 3 didn't know what samples they were
 4 collecting and wouldn't know how to make
 5 sure they'd done it or not?
 6 A. Well, I saw them doing it.
 7 Q. What did you see them do?
 8 A. Collecting samples from where the water
 9 was exiting the plant.
 10 Q. Did they go down by the fence line?
 11 A. They'd sample the fence line, outside the
 12 fence line, and inside the fence.
 13 Q. And this would have been the wastewater
 14 stream?
 15 A. Yeah.
 16 Q. Okay. And when you say "they," again, I
 17 have to ask you to --
 18 A. Lab.
 19 Q. Lab people?
 20 A. Lab people. Now, our waste treatment
 21 operator was also -- also would catch some
 22 samples along those lines.
 23 Q. Okay. Out of the ditch going north of the

1 plant?
 2 A. Yeah, north. North and west.
 3 Q. Now, there's been some discussion about a
 4 separate lab that was set up for a while
 5 to do PCB testing, and that was sent
 6 back -- I think the person thought to St.
 7 Louis at some point?
 8 A. I'm not aware of that.
 9 Q. Okay. Were you ever provided results of
 10 those tests?
 11 A. No.
 12 Q. Okay.
 13 A. You know, they went to the lab supervisor
 14 and then to the environmental people.
 15 Q. Who was the environmental person while you
 16 were night superintendent?
 17 A. What is that guy's name?
 18 Q. If I said Jerry Brown, would --
 19 A. Childers.
 20 Q. Childers?
 21 A. Jerry Brown and Bob Childers. This is
 22 just night superintendent, right?
 23 Q. Right. When's the first time you remember

1 there being an environmental person at the
 2 plant?
 3 A. With that title, I don't know exactly
 4 when. But there was always somebody
 5 involved in it.
 6 Q. Who do you think in the '60s, then, was
 7 involved in it?
 8 A. I know Red Taffee was at one time. The
 9 old memory ain't what it used to be. Of
 10 course, Jerry Brown, and Robert Jones now.
 11 Q. My question --
 12 A. There were some people that worked there
 13 when I first went there that I didn't know
 14 as much because I was new too. And I
 15 wasn't involved with them.
 16 Q. One last set of questions, and I can let
 17 you be a free man.
 18 Have you heard in reading the Star
 19 or talking to people that PCBs have
 20 allegedly been found in a number of
 21 residential properties around the plant?
 22 A. I've read it.
 23 Q. Okay. Have you heard that it has been

Page 89 1 alleged that a number of people around the 2 plant have found the PCBs in their blood? 3 A. I read that, although I don't believe it 4 was very high. 5 Q. Okay. 6 A. I mean, I've just read -- I bet if you 7 compared theirs with mine, thiers would be 8 minuscule. 9 Q. Would it surprise you to learn that I've 10 got clients with readings much higher than 11 yours? 12 MR. MYERS: Object to the form. 13 A. It would surprise me very much. 14 Q. Did it surprise you when you heard that 15 people were claiming to have found PCBs in 16 these yards around the plant? 17 A. Yeah. Did it surprise me when the people 18 found them or -- 19 Q. Well, let me put it this way: Have you 20 heard that Monsanto found it when they 21 went out and sampled and that the EPA 22 found it when they went out and sampled 23 it?	Page 91 1 Answer his question. 2 A. Did it surprise me? 3 Q. Uh-huh (indicating yes). 4 A. I just didn't really believe that there 5 was that much release of any PCBs. 6 Q. Have you heard about the EPA Superfund 7 people coming to town? 8 A. I read that in the paper. 9 Q. Did that surprise you? 10 A. What's the Superfund? 11 Q. Well, that -- it's a particular department 12 within the EPA designed to come and deal 13 with the worst abandoned waste sites in 14 the country. 15 MR. MYERS: Object to the form, if 16 that's a question. I don't know 17 that it is. 18 Q. You don't know what Superfund is? 19 A. No. 20 Q. Again, my question is fairly simple. When 21 you heard about them coming to town, did 22 it surprise you or not? 23 A. I just -- I don't know. I just read about
Page 90 1 MR. MYERS: Object to the form. 2 A. All I read was what was in the paper. The 3 more I read, the more I knew it was all 4 about people out in the community wanting 5 to get money. 6 Q. So you don't believe it, and you don't 7 think it's out there? 8 A. I don't know. I mean, the paper said it, 9 and I assume that there's got to be 10 something there. 11 Q. Well, my question is even a little bit 12 simpler as to whether -- not so much do 13 you believe it, but were you surprised? 14 A. Yes. 15 Q. That's -- okay. And you didn't even -- 16 you haven't until today heard about the 17 fish advisory, if I understood your 18 earlier testimony? 19 A. I think I -- you know, I read about it in 20 the paper. 21 Q. Did that surprise you when you heard that 22 the fish down there were contaminated? 23 MR. MYERS: Object to the form.	Page 92 1 all of this in the paper and just thought 2 it was overblown. 3 Q. Well, that's my last question. Is it fair 4 for me to say that as to all of these 5 things, your perspective on it is that 6 you're not concerned, and you think it's 7 all overblown? 8 MR. MYERS: Object to the form. 9 A. I do. 10 MR. CUNNINGHAM: Okay. That's all I 11 have. 12 13 (AND FURTHER DEPONENT SAITH NOT.) 14 15 16 17 18 19 20 21 22 23

1 I do hereby certify that the witness whose
2 attached deposition was taken before me was by me
3 first duly cautioned and sworn to tell nothing but
4 the truth in the cause aforesaid; that the
5 testimony contained herein was by me reduced to
6 writing in the presence of said witnesses by means
7 of stenography and afterwards transcribed by means
8 of computer aided transcription. The foregoing is
9 a true and accurate transcript of the whole of the
10 testimony given by said witness, as aforesaid.

11 I do further certify that I am not
12 connected by blood or marriage with any of the
13 parties or their attorneys or agents and that
14 I am not an employee of any of them, nor
15 interested in the matter of controversy.

16 IN WITNESS WHEREOF, I have hereunto
17 set my hand and affixed my notarial seal at
18 Gadsden, Alabama, County of Etowah, this 12th
19 day of January, 2002.

20

21

22 -----
Misty Perry Sanders
Notary Public, Alabama-at-Large
23 My Commission Expires: 11-01-2003

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[& - answer]

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