

1 homes, didn't they, sir?

2 A. Yes, sir.

3 Q. That, of course, would presumably be air born dust
4 particles that got into the homes, correct, sir?

5 A. Well, that or dirt.

6 Q. Well, dirt and dust. If it's on the dirt and gets
7 carried in the air, it can be carried into the home in forms
8 of dust, can it not, sir?

9 A. I would assume so, yes.

10 Q. Trucks, cars passing over dirt churns it up into
11 little pieces, carries it through the various parts of the
12 community, it turns into dust and it can waft into one's
13 home, can't it, sir?

14 A. Well, I know that dioxin is --

15 Q. Excuse me, Doctor, I'm talking about dust. Dust can
16 be churned up on the roads and streets, it can be carried in
17 the form of mud from one part of to the community to another
18 part of the community, turned into dust which subsequently
19 can end up in your home, isn't that correct, sir?

20 A. Yes, sir.

21 Q. Doctor, are you aware of the fact that insofar as
22 Sturgeon is concerned there was a large number of railroad
23 ties that was soaked with orthochlorophenol?

24 A. Yes, sir.

1 Q. And were you also aware of the fact that when you
2 burn wood that's soaked with chlorinated phenols that the
3 burning of that wood can create dioxin? Were you aware of
4 that, sir?

5 A. I know municipal incinerators can, yes.

6 Q. And that dioxin created by the burning of the
7 chlorinated wood is carried through the air in the form of
8 smoke and fly ash, is it not, sir?

9 A. Yes, sir.

10 Q. That smoke and fly ash can be breathed, can it not,
11 sir, if you're -- if it's in your air that you breathe?

12 A. Yes, sir.

12 13 Q. And you can get the contents of that dioxin in that
14 -- in that smoke and in that fly ash, you can get it into
15 your system that way, can you not, sir?

16 A. Yes, sir.

17 Q. If it gets in your system that way, it can affect
18 you, can't it, sir, if dioxin is something that can affect
19 you, and if you breathe enough of it in?

20 A. Assuming all that, yes.

21 Q. Is that correct, sir?

22 A. Assuming all that.

23 Q. Is that correct, sir, assuming those things?

A. Yes, sir.

1 came down in their community from these municipal
2 incineration, they got it from using Lysol in their kitchen,
3 they got it from using 2,4,-D on their lawns or they got it
4 from eating cattle that had eaten 2,4,5-T on their range
5 land, isn't that correct, sir, or they got it from Vietnam,
6 isn't that correct, sir?

7 A. Those would be potential sources, yes, sir.

8 Q. Now, Doctor, none of those people that had those
9 levels of dioxin, however, so far as you know were exposed to
10 the dioxin that would be contained in the burning of these
11 chlorinated soaked ties, isn't that correct, sir?

12 A. I didn't understand your question, sir.

13 Q. None of the people who got dioxin in their fat
14 tissues so far as you know were exposed to the direct burning
15 process of wood soaked with OCP or chlorinated phenols, isn't
16 that correct, sir?

17 MR. NEWBOLD: Objection, Your Honor, may we approach
18 the bench.

19 THE COURT: Sure.

20 (At this time a conference was had at the bench out
21 of the hearing of the jury.)

22 MR. NEWBOLD: Objection to the form of question,
23 Your Honor. There's no possible way that this witness could
24 know as to how -- whether these people had ever been exposed