IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE UNITED STATES OF AMERICA, Plaintiff,	)	
vs.	)	
OUTBOARD MARINE CORPORATION, Defendant, Third Party Plaintiff,	)	79 C 1004
vs.	)	
MONSANTO COMPANY, Third Party Defendant.	)	

The sworn statement of NORMAN T. JOHNSON, taken at the Henkel Corporation, 2360 East Devon Avenue, DesPlaines, Illinois, on Thursday, September 20, 1979, at 8:50 o'clock A.M., upon interrogatories propounded by Mr. Bruce A. Featherstone.

PRESENT:

Mr. Norman T. Johnson,
Mr. Bruce A. Featherstone,
Ms. Jane Koller.

Reported for
LA SALLE REPORTING SERVICE, by
Jane Koller.

DEPOSITION EXHIBIT
PIF's 85
3-24-92

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Q Did you discuss this point with Mr. Stenberg?

A We talked about where it was concentrating, yes. And the implication certainly it could get into the food chain by way of lake trout in Lake Michigan.

Q And by "it" you mean PCB?

A PCB.

Q Other than yourself and Mr. Stenberg, was there anyone else who was a party to this conversation?

A I don't remember, other than Bob Daminai would have been there on both those occasions. We did not make calls on a customer without the salesman.

Q Did there come a time when Monsanto sold Johnson a Pydraul fluid other than Pydraul A-200?

A Yes. We started to reformulate to produce a new product which was based on chlorinated terphenyl and a lower chlorine content biphenyl which would greatly minimize or hopefully eliminate the higher chlorinated material, chlorinated biphenyl that was showing up in the environment. And that product was called Pydraul A-200B.

12 Q Pydraul A-200B?

A Yes.

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Q Did Monsanto advise Johnson Motors that Pydraul A-200 had been reformulated to Pydraul A-200B?

A Absolutely.

Q What was said to Johnson Motors about the chemical differences between Pydraul A-200B, the substitute fluid, from its predecessor Pydraul A-200?

A We would have defined the chemistry of the terphenyl and the chemistry of the biphenyl, and talked about the percentage of chlorine on each of the rings and how we were taking a solid material and blending it with the low chlorinated liquid material to gain solubility, and derive a replacement hydraulic fluid that would be low in the higher chlorinated biphenyl materials.

Q Who were these discussions with at Johnson Motors?

A I would remember the discussion with John Nevill.

Q Did you tell Mr. Nevill the reasons for the reformulation to Pydraul A-200B?

A No question. We had been keeping Johnson Motors informed about the whole PCB problem, and they certainly recognized the reformulation was an

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