

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON, WEST VIRGINIA

JAMES M. ADKINS, Administrator)
of the Estate of Ralph E. Adkins,)
Deceased, et al,)

Plaintiffs,)

vs.)

No. 81-2098

MONSANTO COMPANY, a Delaware)
Corporation,)

Defendant.)

Deposition of
VINCENT T. MATTEUCCI
taken on behalf of
the plaintiffs.

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Reporter: M. Joy Springer

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Defendant.

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APPEARANCES:

Messrs. Calwell, McCormick & Peyton,
by W. Stuart Calwell, Jr., Esq., For the Plaintiffs;

Messrs. Bowles, McDavid, Graff & Love,
by P. Michael Pleska, Esq., For the Defendant.

IT IS STIPULATED AND AGREED by and between
counsel for the plaintiffs and counsel for the defendant
that the deposition of VINCENT T. MATTEUCCI may be taken
pursuant to Rule 26(a) of the Federal Rules of Civil Pro-
cedure, on behalf of the plaintiffs, on July 15, 1983, at
the Radisson Hotel, Room 215, 9th Street and Convention
Plaza, St. Louis, Missouri, before M. JOY SPRINGER, a
Notary Public within and for the County of Madison, State

1 of Illinois; that the issuance of notice and dedimus is
2 waived, and that this deposition may be taken with the same
3 force and effect as if all Federal rules and statutory
4 requirements had been complied with.

5 IT IS FURTHER STIPULATED AND AGREED that
6 any and all objections to all or any part of this deposition
7 except objections as to form of the questions asked or
8 answers given, are hereby reserved and may be raised on
9 the trial of this cause; and that the signature of the
10 deponent is not waived.

11 * * * * *

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15 VINCENT T. MATTEUCCI,

16 produced, sworn and examined on behalf of the plaintiffs,
17 deposes and says as follows:

18 EXAMINATION

19
20 BY MR. CALWELL:

21 (Whereupon the reporter marked Plaintiff's
22 Deposition Exhibit #342 (Monsanto's I.D.
23 #8324389 and 8324390), consisting of two pages;
24 Plaintiff's Deposition Exhibit #343 (Monsanto's
25 I.D. #8324391), consisting of one page.)

1 Q Would you state your name for the record,
2 please?
3 A My name is Vincent Thomas Matteucci.
4 Q And where do you live?
5 A I live at 13638 Armstead, A-r-m-s-t-e-a-d,
6 St. Louis, Missouri 63131.
7 Q And you're employed by Monsanto?
8 A Yes.
9 Q What do you do for Monsanto?
10 A I'm Director of Manufacturing in the
11 Industrial Chemicals operating unit.
12 Q Is that MIC?
13 A MIC.
14 Q What is your education?
15 A I graduated as a chemical engineer in 1960
16 from Northeastern University.
17 Q What kind of degree is that? B.S.?
18 A Bachelor's.
19 Q Okay. Any other education?
20 A I've attended graduate business school. I
21 don't have a graduate degree.
22 Q So you did some post-graduate course work,
23 that kind of thing?
24 A Yes.
25 Q Okay. When did you first go to work for

1 the company, Monsanto?

2 A Joined Monsanto in 1957.

3 Q You are in some kind of a co-op program?

4 A Yes, I was.

5 Q Where did you first work for Monsanto?

6 A In Everett, Massachusetts.

7 Q You born up there?

8 A Yes, I was.

9 Q And what kind of a facility did they have
10 at Everett, Massachusetts?

11 A At that point in time I would describe it
12 as a fairly large multi-product chemical plant.

13 Q Make any herbicides up there?

14 A Not to my knowledge.

15 Q You work with any chlorinated phenols in
16 that operation?

17 A No, I did not.

18 Q You got your degree, then, in 1960 and con-
19 tinued on with Monsanto, and what was your next position
20 with Monsanto, where was it?

21 A Well, I stayed at Everett through 1963 in
22 various technical and manufacturing positions, and at that
23 point in time I transferred to St. Louis Headquarters in an
24 engineering department that was not the Central Engineering
25 Department but was a division engineering department,

1 precursor to a central engineering group.

2 Q Now, when you say a central engineering
3 group, is that a central engineering group in something
4 like MIC?

5 A Obviously we reorganized several times since
6 then. It was specifically the Engineering Department for
7 the Inorganic Chemicals Division at that time.

8 Q In these depositions we have been talking
9 about organizational units. I realize there's been a lot
10 of reorganizations.

11 A I'll try to keep that clarified. It was
12 Inorganic Engineering Department.

13 Q So it was the central engineering of an
14 operating unit of some kind?

15 A That's right. As opposed to the engineering
16 department located at a plant.

17 Q All right. Did you work with any chlorinated
18 phenols in that position?

19 A No, I did not.

20 Q How long did you stay in that position?

21 A Oh, approximately three and a half years.
22 Just to clarify the organizational changes, during that
23 period we created what's now called the Central Engineering
24 Department, and in the last year or two of that period the
25 Inorganic Engineering Department in effect was assimilated

1 into a Corporate Engineering Department.

2 Q Now, you said Corporate Engineering Depart-
3 ment. Is that company-wide?

4 A World-wide, company-wide.

5 Q And that happened how long ago?

6 A '66, approximately. That's a matter of
7 record.

8 Q I'm just trying to get some idea. So then
9 beginning in about the middle '60's you were in a central
10 engineering department that had company-wide responsibility?

11 A Yes.

12 Q Now, what does a corporate engineering
13 department do? I mean, is it an advisory kind of thing,
14 or what is it?

15 A Basically involved in the capital programs
16 for the corporation, the design and the construction of new
17 plants, significant plant improvements, expansions, things
18 of that sort.

19 Q Would you be designing new facilities at
20 existing plants?

21 A All of the above. New facilities, existing
22 plants, new plants.

23 Q Did you design or do any work for the Nitro,
24 West Virginia, manufacturing facility?

25 A I did not specifically. Obviously, the

1 Central Engineering Department did.

2 Q Did anybody working under you or associated
3 with you in that department do that?

4 A No.

5 Q Do you know anyone in the Central Engineering
6 Department who did?

7 A Not specifically.

8 Q But you do know that some work was done?

9 A I'm assuming that some work was done.

10 Q If you wanted to find out what work was
11 done, if at all, who would you go ask?

12 A Your question is specific to the mid-'60's?

13 Q Yeah, right.

14 A I guess I'd have to ask the people who were
15 responsible for the Nitro Plant at that time.

16 Q How would you find them, how would you know
17 who they are?

18 A It's a matter of record who the plant
19 managers, who the technical superintendents were at that
20 time.

21 Q So, I mean, if you wanted to find out what
22 the Corporate Engineering Department did, you'd ask the
23 Nitro Plant manager?

24 A Yes.

25 Q And he'd know what Corporate Engineering did

1 for them?

2 A He'd know what was taking place at that
3 point in time. He would know what kind of activity and
4 projects were being installed. It would be a matter of
5 record who the specific people were involved. It could be
6 dozens of people.

7 Q That would be the place to start, the plant
8 manager in charge at that particular time?

9 A It would be a matter of record. There would
10 be engineering drawings and documents people had probably
11 signed.

12 Q Now, has there always been, to your knowledge,
13 some type of a Corporate Engineering Department or function?

14 A To my knowledge, there has always been a
15 Central Engineering Department in Monsanto. It has been
16 called different things at different points of time and it's
17 had different levels of responsibility. From my earliest
18 days I could tell you that that would have included many of
19 our corporate architects and our corporate specialists in
20 terms of specific areas of technology.

21 Q Now, I am trying to get a relationship
22 between the Corporate Engineering Department and, perhaps,
23 other engineering operations. Is it the ultimate responsi-
24 bility of the Central Engineering Department to design these
25 new plants, new facilities, and retooling and that kind of

1 thing that you were talking about?

2 A Only significant.

3 Q The significant program?

4 A That's right. And the definition of signi-
5 ficant probably has changed through the years. It might
6 have been a dual limit, and even at that point was a guide-
7 line, not a policy. Where you might say, to use an example,
8 if a project looks like it's under a million dollars,
9 clearly many of our plants would have the capability of
10 designing and executing that kind of expansion or modifica-
11 tion. But it might be substantially greater than that and
12 a specific plant at that point in time might have the
13 resources to do, say, a two-million-dollar project, so
14 there's no hard-and-fast policy. Guideline based on work
15 loads, both corporate-wide and plant level, and the capa-
16 bility of the plant.

17 Q Does the Central Engineering Department,
18 or whatever department carried out that function over the
19 years, does it have a, like, a supervisory function, let's
20 say, over a plant engineering department that might be
21 designing, say, a major project? Would it be subject to
22 the supervision or approval or review of the Central
23 Corporate Engineering?

24 A Not formally. Our plant Technical Services
25 Departments traditionally have not reported back to our

1 Corporate Engineering Department, but, obviously, there is
2 a technology network within Monsanto. Our plant technical
3 people would have technical relationships especially with
4 specialists in our corporate group.

5 Q So you have pretty good communication net-
6 works to tap expertise throughout the --

7 A I would hope so.

8 Q Has that generally been true over the years
9 for Monsanto?

10 A I think it's more of an individual situa-
11 tion. It's not corporate policy.

12 Q But it is a practice?

13 A It's a practice. There are people within
14 the company who have spent much of their careers in very
15 narrow technical areas and you know who they are --

16 Q You can tell. All right. We left off
17 where you're in the Central Engineering Department in '66,
18 right?

19 A In '66.

20 Q And you're working as an engineer in there,
21 obviously?

22 A As a Project Manager but as an engineer.

23 Q And how long did you stay in that position?

24 A Until about late '66.

25 Q What happened to you then?

1 A At that point in time I transferred to our
2 Krummrich Plant, which is in Sauget, Illinois.

3 Q What were you doing for the Krummrich Plant?

4 A I was at Krummrich from approximately late
5 '66 to June of 1970, so I'll try to capture that entire
6 period for you. During that period I basically had two
7 positions, an Engineering Supervisor and then the Technical
8 Superintendent for what was at that time the Inorganic
9 Division products that were produced at the Krummrich Plant.

10 Q What were those products?

11 A Those products, to the best of my recollec-
12 tion, were -- and I'll list them. It's a fairly long list.

13 Q Just an idea of what it is.

14 A Phosphoric acid, phosphorus trichloride,
15 phosphorus oxychloride, phosphorus pentachloride.

16 Q Was Santophen one of them?

17 A Santophen was not one of them. You want me
18 to continue the list?

19 Q No, that's all right. Now, when you were
20 at the Krummrich Plant, did you work with chlorinated phenols?

21 A No.

22 Q Did you supervise anyone who did?

23 A No, I did not.

24 Q Did no work at all with pentachlorophenol?

25 A None at all.

1 Q Orthochlorophenol?

2 A None at all.

3 Q Trichlorophenol?

4 A No.

5 Q Did you know there was an operation at that

6 time that dealt with the chlorophenols?

7 A Yes, I did.

8 Q Was that Department 237, something like that?

9 A There were a number of departments. I think

10 that was one of them.

11 Q So looks like about four years or so you

12 were at the Krummrich Plant. Your duties never brought you

13 into contact with the operations concerning the chlorophenols

14 there, is that right?

15 A That's correct.

16 Q Okay. What happened in 1970, then?

17 A 1970 I became the Plant Manager of our plant

18 in Martinez, California.

19 Q What's that plant do?

20 A At the time that plant had two major func-

21 tions. It produced a family of vanadium and platinum

22 catalysts and produced elemental sulfur and sulfuric acid

23 that were recovered from the refinery waste stream that was

24 located adjacent to the plant.

25 Q During that time did you have occasion to

1 work with carbon disulfide?

2 A No, I did not.

3 Q H2S?

4 A Yes, I did.

5 Q What did your work with H2S involve?

6 A H2S was one of the refinery waste streams
7 I mentioned to you. We in effect transferred streams con-
8 taining hydrogen sulfide gas from the refinery and produced
9 both elemental sulfur, which we marketed, and sulfuric acid
10 from those waste streams.

11 Q You were the Plant Manager, and as I under-
12 stand, part of the mission of the Plant Manager is to be
13 responsible for the health and safety of the workforce?

14 A That clearly is one of his major responsi-
15 bilities.

16 Q Particularly if you're working with a sub-
17 stance such as H2S?

18 A That's correct.

19 Q That is a highly toxic and dangerous sub-
20 stance, isn't it?

21 A It certainly is.

22 Q Did you receive any training about the
23 handling of dangerous or toxic substances during the course
24 of your work at Monsanto?

25 A Yes, I have.

1 Q What did that consist of?

2 A I can't specifically tell you about all the
3 training I have had in that project.

4 Q Kind of --

5 A Hydrogen sulfide is probably one of the
6 number one killers in the chemical industry. There are
7 more mortalities from hydrogen sulfide gas than any other
8 chemical. At least, that's the statistics I recall when I
9 was in that job. So clearly there were a great deal of
10 publications, films for safety training available to myself
11 and they were supplied both internally from our Corporate
12 Safety and Property Protection group as well as other
13 industry groups. I can recall seeing several films that
14 were training films giving a great deal of information con-
15 cerning that product.

16 Q Now, aside from being informed that it would
17 kill you, were you provided any information about its long-
18 term health effects, if any, that were obviously less than
19 fatal?

20 A I don't specifically recall that, although,
21 we certainly at that point in time were monitoring closely
22 for hydrogen sulfide gas at this location.

23 Q How did you do that?

24 A Initially I can recall that monitoring being
25 the typical one-shot test with a Draga tube and a capsule

1 of some sort, and then as technology developed and began
2 to mature, we went to continuous monitors for H2S.

3 Q Continuous monitoring?

4 A Uh huh (yes).

5 Q Now, in connection with that, did you have
6 any specific health monitoring of the people who were
7 working in that area to check their physical condition
8 periodically?

9 A Yes.

10 Q And was a part of that physical examination
11 specifically designed to look for the effects of H2S expo-
12 sure?

13 A I don't believe that we specifically looked
14 for that.

15 Q Okay. What kind of a health monitoring
16 program did you have in place out there?

17 A Basically we had a program where all
18 employees received annual physicals under the direction of
19 a local physician that we contracted with.

20 Q Did this local physician have any particular
21 training in industrial hygiene or industrial medicine?

22 A Not to my knowledge.

23 Q Was there a requirement or company policy
24 that looked at the qualifications of doctors who were con-
25 tracted with or hired as plant physicians?

1 A Absolutely. That was a decision that was
2 typically jointly made between plant management and our
3 Corporate Medical Department.

4 Q What were the kinds of things you looked at
5 in terms of qualification for the physician?

6 A Clearly you look for medical competency,
7 somebody who would service the plant. That was always a
8 concern.

9 Q How would you know if a doctor was competent
10 to engage in this rather specialized area of medicine?

11 A You're making an assumption in those days
12 we had an open choice of physicians who were trained and
13 knowledgeable in industrial medicine, and I don't believe
14 that's an accurate assumption.

15 Q Well, did you look for someone who was?

16 A You would try to, but, frankly, industrial
17 medicine, particularly in the early '70's, was not what I
18 perceived as a field we could simply go out and take our
19 pick among several. Specifically at Martinez the physician
20 we had there was there when I arrived and was there when I
21 left, and he was a very professional physician. He was also
22 a surgeon. He also became my personal physician. That's
23 how much confidence I had in him. I can only tell you that
24 all the people at Martinez felt he serviced them very pro-
25 fessionally during that period.

1 Q Did you ever determine what his qualifica-
2 tions were?

3 A I never personally looked through his back-
4 ground. He was a surgeon, he was an F.A.C.S. He certainly
5 had the up-front credentials in terms of my experiences with
6 him that I would have to suggest that his qualifications
7 became apparent to me during the period that I had a rela-
8 tionship with him.

9 Q Okay. But you don't know whether he had any
10 particular expertise in examining or monitoring people who
11 may have been exposed to one or more hazardous substances,
12 you don't know about his qualifications in that regard?

13 A No, I don't. As we were concerned about
14 our industrial hygiene exposure in the plant, he was aware
15 of those. We provided a certain amount of that feedback
16 to him to help him in his evaluation.

17 Q And was that a company policy or practice,
18 to provide the on-site physician with as much information
19 as possible to assist him in his --

20 A It certainly was practice. I don't say it
21 was written policy, I can't say I ever read that, but
22 clearly it was the practice. I'm sure that from time to
23 time we met with him and routinely gave him some of the
24 specifications of what we were trying to accomplish.

25 Q Now, your experience as Plant Manager when you we

1 at Martinez, California, insofar as the doctor was concerned,
2 when you got there he was there and you were perfectly satis-
3 fied with him the years you were at that plant. Now, was
4 that your first plant manager's job?

5 A Yes, it was.

6 Q Was it your only plant manager's job?

7 A Yes, it was.

8 Q In preparation for that job did you receive
9 any kind of training, like, a course from Monsanto, like,
10 introduction to being a plant manager or something like that?

11 A No course specific to that at that time.
12 Since then we have developed one.

13 Q Since 1970, or thereabouts?

14 A Well, certainly since 1970. I don't recall
15 specifically when we developed the course.

16 Q And what I was getting at, did you receive
17 any specific instructions about plant medical people? In
18 other words, "you're going to be a plant manager tomorrow,
19 Mr. Matteucci, and you have to look for these kinds of
20 things in these medical people," did you get any instructions
21 like that?

22 A No, I did not.

23 Q So how did you learn that it was Monsanto's
24 practice to look at the qualifications of the doctors that
25 you contracted with and used as plant physicians? How did

1 you come to know that?

2 A Annually our corporate medical people would
3 visit the plant, talk to us about our experiences, what we
4 were trying to accomplish, meet with the local physician.
5 I recall specifically those kinds of things.

6 Q Do you know if that was a company-wide
7 practice?

8 A I can't say. I'm assuming it was, but that's
9 an assumption on my part.

10 Q I understand. The Corporate Medical Depart-
11 ment people would at least visit your plant and chat with
12 the physician and see what's going on?

13 A Yes. And there were others. Not just
14 corporate medical at that time. We did have and have had
15 for some time industrial hygiene group that would come out
16 and --

17 Q Do the same thing?

18 A Safety and property protection as well.

19 Q And they would take a look at and monitor
20 that H2S situation?

21 A The H2S was probably more a safety concern
22 in the plant than hygiene. Our experience and the industry
23 experience at that time was clearly exposures or emissions
24 of H2S were highly hazardous, not so much from an industrial
25 hygiene standpoint but simply from a survival standpoint.

1 Q It's given that H2S will kill you, obviously.
2 Were you given any information about repeated low-level
3 exposure over a period of time?

4 A Not that I recall.

5 Q And was there a level of exposure to H2S
6 that was considered safe?

7 A Yes, there was. I don't recall the specific
8 level, but we clearly had guidelines as to what the exposure
9 levels were for most of the chemicals that we had.

10 Q All right. And do you know if those exposure
11 levels took into account the effects of repeated exposure to
12 low levels over the years?

13 A I expect that would have been typical NIOSH
14 data. I can't comment what kind of testing was behind those
15 limits..

16 Q As Plant Manager you didn't receive any par-
17 ticular instruction along those lines, is that right?

18 A Not any specific instructions but clearly
19 assimilated knowledge.

20 Q Did you tell your workforce anything about
21 suspected or real long-term effects of low-level exposures
22 to H2S over a period of time?

23 A No.

24 Q As far as you know, there was no literature
25 from Monsanto about that either?

1 A None that I specifically recall on low-level
2 exposure other than we certainly had the NIOSH information
3 available to us on not only H2S but all the other chemicals
4 we produced. That information was clearly discussed openly
5 in the plant with all our employees.

6 Q And I presume you had a level that was a fatal
7 level, you could be exposed to a level of it that would kill
8 you?

9 A We certainly knew that.

10 Q And if you blotted that out on a continuum,
11 if you worked back to a point where there would be no expo-
12 sure, somewhere in between there was a safe level and
13 between a safe level and a fatal level you had varying
14 degrees of exposure that may or may not have been harmful,
15 is that right?

16 A That would have been typical information for
17 many of the chemicals we produced, and that exposure level,
18 that threshold level, was at that point in time probably
19 the NIOSH book that we annually received an update from our
20 industrial hygiene group or as significant changes were
21 made to that we would receive those.

22 Q So it would be your testimony, then, that
23 the NIOSH book was the standard for Monsanto on many of
24 these chemicals?

25 A I wouldn't state that for all of Monsanto,

1 but clearly that was the guideline we used.

2 Q All right. How long were you at the
3 California plant?

4 A Approximately five years. I left there in
5 the fall of 1975.

6 Q And where did you go?

7 A At that point in time I joined the Detergent
8 and Phosphates Division of MIC in marketing and had marketing
9 responsibility for general and industrial phosphates.

10 Q And where were you stationed?

11 A In St. Louis.

12 Q From California back to St. Louis, right?

13 A (Nods head affirmatively.)

14 Q Now, in that job you say it was like a
15 marketing job?

16 A It was Marketing Manager's assignment for
17 that family of products.

18 Q You sell stuff, or what?

19 A No. This is a planning staff position
20 where you essentially --

21 Q That's a corporate staff?

22 A No. It's division staff. You'll have to
23 understand that within Monsanto I think of sales as being
24 the salesman who calls on the customer getting the order,
25 and market planning being the people involved with setting

1 world-wide strategy, and that includes volume, price, market
2 segmentation and all the typical planning responsibilities
3 of marketing.

4 Q And did any of the products that you were
5 involved with there, were there any chlorinated phenols
6 involved in those products at all?

7 A No. This was a family of inorganic phos-
8 phate products, many of which are used in food, FDA appli-
9 cations.

10 Q How long were you in the marketing business?

11 A I was in that position approximately a year
12 and a half.

13 Q Then where did you go?

14 A At that point I became the Commercial
15 Director for our water treatment chemicals business.

16 Q Did those products involve any phenols,
17 chlorination of any benzene rings or anything like that?

18 A No, they did not.

19 Q So how long were you in that business?

20 A Approximately two years.

21 Q So that gets us up to about '79 or so?

22 A 1979, the spring of '79, April of '79.

23 Q What happened then?

24 A At that point in time I became the Director
25 of Manufacturing for the Detergent and Phosphates Division.

1 Q And did the Detergent and Phosphates
2 Division, would that be the same products that you were
3 involved in marketing with?

4 A Yes.

5 Q Did it include any additional matters?

6 A Yes.

7 Q Would it have included any chlorinated
8 phenols?

9 A Yes.

10 Q And that would have been the Santophen,
11 perhaps?

12 A Yes.

13 Q And orthochlorophenol crude?

14 A And the family of products associated with
15 that, yes.

16 Q In '79 what does a Director of Manufacturing
17 of the Phosphates Division do?

18 A I had line responsibility for five plants.
19 Those plants were Augusta, Georgia; Kearny, New Jersey;
20 Trenton, Michigan; Carondelet, which is St. Louis, Missouri;
21 Long Beach, California.

22 Q And how long did you stay in that job?

23 A Approximately two years.

24 Q In '81. Does that get you to your present
25 position?

1 A Not really.

2 Q What happened in '81?

3 A In 1981 we reorganized the manufacturing

4 function in MIC, and in addition to the five plants that I

5 just mentioned I picked up five additional plants.

6 Q Okay. Who did you pick up?

7 A Nitro, West Virginia; Everett, Massachusetts;

8 Camden, New Jersey; Seattle, Washington. I left one out.

9 Q That's all right.

10 A Della River Plant, New Jersey.

11 Q Now, those plants were merely brought under

12 the same kind of position you had as Director of Manufac-

13 turing for Detergents and Phosphates, right?

14 A Yes. Fred Holzapfel retired approximately

15 at that point in time and I replaced him as Director of

16 Manufacturing for Nitro. Just give you that transition.

17 Q Okay. How long did that job last?

18 A Two years.

19 Q That gets us to '83. That must be where

20 you are now?

21 A Essentially in January of '83 I'm still

22 the Director of Manufacturing with another mix of plants

23 that does not include Nitro.

24 Q So for a brief period of time there Nitro

25 was under you, right?

1 A Yes.

2 Q And then it was taken out from under you.

3 Now, through this period of time that we are talking about

4 did you ever learn anything about a family of substances

5 called dioxins?

6 A Yes.

7 Q When did you first become aware there was

8 such a substance or substances?

9 A I can't give you specific date, but I would

10 say mid-to-late '70's, that range.

11 Q Do you know what the occasion was of your

12 finding out about that?

13 A I don't recall.

14 Q What did you find out about it?

15 A Through that period I would have to say that

16 dioxins as a contaminant, certain chemicals was receiving

17 a fair amount of public and in-house exposure, and somewhere

18 in that period of time I became aware of it; but I can't

19 recall specifically whether it was in a trade magazine or

20 an internal document or one of my peers talking about it,

21 I don't recall. But it was in that '76 to '79 time period.

22 Q Okay. Did you do any professional reading

23 on the subject?

24 A No, I've not.

25 Q When you got this responsibility for the

1 Nitro Plant, were you made aware of any suspected problems
2 with the dioxin contamination in a product they used to
3 manufacture there, 2,4,5 T?

4 A I was aware of that, yes.

5 Q How were you made aware of that?

6 A Through plant visits, discussions and my
7 involvement in the Nitro Task Force.

8 Q Okay. And how long were you on the Nitro
9 Task Force?

10 A Approximately two years.

11 Q And the reason you were on it was because
12 you had responsibility for this plant during that period of
13 time?

14 A Yes. Fred Holzapfel was a member, and when
15 he retired I became a member.

16 Q Are you familiar, then, with the Suskind
17 studies?

18 A Yes, I am.

19 Q And I've been told that there was a mortality
20 study that Suskind did on the Nitro group, is that correct?

21 A I've not seen it specifically. I've heard
22 that comment made.

23 Q And there was also a morbidity study under-
24 taken. Were you aware of that?

25 A I was generally aware of that, yes.

1 Q Now, do you know why those studies were
2 undertaken at the time they were undertaken?

3 A Obviously wasn't involved when the decisions
4 were made to conduct those studies.

5 Q But did you learn why those studies were
6 undertaken?

7 A I don't think I've ever asked specifically
8 why, but clearly this is something because of the exposure
9 that people had had, my perception that Monsanto clearly
10 wanted to identify what, if any, health hazards, health
11 impacts were the results of chemical exposures at the
12 Nitro Plant.

13 Q And as far as you know, that was the motiva-
14 tion for those undertakings?

15 A I think we have done other similar studies,
16 perhaps, with less scope, but this was not unusual.

17 Q Do you know if you've done other similar
18 studies on dioxins?

19 A Not to my knowledge.

20 Q Do you know if there have been similar
21 studies done -- well, what did those other similar studies
22 involve?

23 A Involved concerns, and I'm talking specifi-
24 cally now back when I was at Martinez when there were
25 exposures there as asbestos became a concern. We were

1 handling a raw material that contained an amount of
2 crystalline type asbestos and we were concerned about that.
3 Our people came out and looked specifically and talked to
4 our local doctor, and we instituted some additional tests
5 during the annual physicals and tightened down on our expo-
6 sure levels as a result of that beyond the NIOSH guidelines.

7 Q Do you know if a study similar to the
8 Suskind studies were done that involved H2S?

9 A No, I'm not.

10 Q So the people at the Martinez Plant, as far
11 as you know, were not studied as a result of their work
12 with H2S?

13 A That's correct.

14 Q Do you know of any studies involving carbon
15 disulfide?

16 A No, I don't.

17 Q Niran?

18 A No, I'm not.

19 Q Aside from the asbestos work that you told
20 me about, do you know of any other studies on any other
21 substance that were similar to the undertaking that Suskind
22 was involved in at the Nitro Plant?

23 A No, I'm not.

24 Q So as far as you know, asbestos is the only
25 one that Monsanto has undertaken?

1 A Yes. It was not specifically asbestos but
2 a component of a raw material we were using. And it doesn't
3 surprise me that we didn't do a health study at Martinez
4 in H2S. We had a very small population, approximately
5 thirty operators, and I understand the difficulty of statis-
6 tically studying that small of a group.

7 Q Okay. Did you have any involvement in the
8 Suskind study at Nitro?

9 A The only involvement I had was waiting for
10 the study to be published. I can honestly say that to the
11 best of my knowledge all of the work was done prior to my
12 being responsible for the Nitro Plant and the study was not
13 published when I left.

14 Q Did you know if the Suskind studies had
15 anything to do with the litigation that the Nitro Plant is
16 involved in?

17 A My perception is it did not.

18 Q So as far as you know, there was no connec-
19 tion there, that was not part of the motivating --

20 A It was my perception that it was not.

21 Q All right. I want to hand you what's been
22 marked Exhibits 342 (Monsanto's I.D. #8324389 and 8324390)
23 and Exhibit 342 (Monsanto's I.D. #8324391).

24 Mr. Matteucci, you have had an opportunity to look
25 at Exhibits 343 and 342, have you not?

1 A Yes, I have.

2 Q And could you describe 342 for the record,
3 please? Just tell us the date and who it's to and that
4 sort of thing.

5 A It's a memo to Clayton Callis and myself
6 from Lloyd Boesch dated February 10th, 1982.

7 Q And as far as you know, you received that
8 memo?

9 A Yes.

10 Q And would you likewise describe Exhibit 343
11 for the record too?

12 A It's a memo from Clayton Callis to myself
13 dated February 9th.

14 Q All right. I presume you got that also, is
15 that right?

16 A Yes.

17 Q Do you have any specific recollection of
18 those two documents?

19 A Generally, yes.

20 Q If you would, please read Exhibit 342, read
21 the material between A and B marked on that exhibit.

22 A "I reviewed the outline in your reference
23 memo. I understand February 11th disclosure is for Monsanto
24 only, but that Dr. Suskind is then clearly free to go
25 public in any manner he wishes. It would seem reasonable

1 for us to request Dr. Suskind to coordinate any release with
2 proper communication inside Monsanto, somewhat as you sug-
3 gest."

4 Q All right, sir. Thank you.

5 I'll hand you Exhibit 343 and ask you to read the
6 materials between A and B, if you would, please, to the
7 Jury.

8 A "Following the discussion with Lloyd at
9 lunch on February 8th, I again reviewed with Dan Bishop
10 the game plan for release of the Suskind study. The avail-
11 able advance information does not indicate any surprises."

12 Q All right. Thank you.

13 Now, while you were on the Nitro Task Force did you
14 receive any preliminary information about Dr. Suskind's
15 results from either the mortality study or the morbidity
16 study?

17 A I personally did not.

18 Q Do you know anyone who did?

19 A I believe that some people did.

20 Q Okay. Do you know who those people might
21 have been?

22 A I'm speculating, but I assume it was Dave
23 Frazer and probably Clayton Callis, possibly someone from
24 our corporate medical group.

25 Q And did you learn what the information was?

1 A Generally, yes.

2 Q What was your general knowledge?

3 A My general perception of the result of the
4 study was there was no significant health problem to the
5 population he studied beyond chloracne.

6 Q Okay. Do you know when you learned that,
7 some time frame?

8 A I would have to say probably early '82,
9 somewhere in that time frame.

10 Q Do you know if there was a written report
11 that contained that information that you testified about?

12 A I don't recall. I recall a sequence of
13 events. During this period we were anxious to get Suskind
14 to complete his report primarily to relieve the anxiety of
15 our employees at Nitro. He had promised them face-to-face
16 feedback on a study, and during the period I was involved
17 with the Nitro Task Force that was primarily our interest
18 in accelerating Suskind to complete and publish that report.
19 Obviously from the standpoint of communications we wanted
20 our employees to hear about it first and not have that kind
21 of information leaking to the press or to our own people.
22 The only other thing I want to comment on is through this
23 period of that lawsuit it was always our intent not to allow
24 the lawsuit or the Suskind study to get in the way of our
25 relationships with our people at Nitro, that we would

1 manage the plant and manage the people to whatever extent
2 we could oblivious to the lawsuit and the Suskind study.

3 Q Okay. Did this preliminary report that you
4 heard about or at least preliminary communication about some
5 preliminary conclusions, was that communicated to the Nitro
6 workers?

7 A It's my perception that it was. I don't
8 recall whether that took place after I left or before I left,
9 but it would have had to have been close to that time frame.

10 Q Do you know how that would have been accom-
11 plished?

12 A I knew what the game plan was, and I assume
13 it was followed.

14 Q What was the plan?

15 A The game plan was to have Suskind, as it
16 always had been, come to Nitro and present his findings to
17 our employees, not only current employees but past employees,
18 because they were the ones that were studied. They were the
19 ones who volunteered to be the guinea pigs for these studies,
20 and we owed them that.

21 Q So the idea was to have some kind of
22 meeting and invite all the people?

23 A The game plan was to have the meeting, and
24 I can't comment as to whether all these things took place.

25 Q I understand that.

A But the discussion revolved around having a meeting, inviting appropriate members of the union as well as all of our employees at present and retired who were a part of the study who wanted to come plus videotaping the presentation in a Q and A so that others who perhaps couldn't make it might have an opportunity to at least first-hand see that if they wanted to.

Q Did the game plan include a mechanism to advise each individual worker what his particular problems or lack of problems were as they were determined during the study?

A I don't recall that ever being discussed because I'll assume, as in all other work that we have done, if an individual is found with a specific problem, then that's handled immediately even through his private physician and obviously face to face with that individual. That would have been routine process.

MR. CALWELL: Thanks, Mr. Matteucci.

It's been a pleasure.

Vincent T. Matteucci

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2 STATE OF ILLINOIS)
) SS
3 COUNTY OF MADISON)
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7 I, M. JOY SPRINGER, a Notary Public, duly
8 commissioned and qualified in and for the County of Madison,
9 State of Illinois, do hereby certify that pursuant to notice
10 came before me on the 15th day of July, 1983, at the
11 Radisson Hotel, Room 215, 9th Street and Convention Plaza,
12 St. Louis, Missouri, VINCENT T. MATTEUCCI, who was by me
13 duly sworn to testify to the truth and nothing but the truth
14 of his knowledge touching and concerning the matters in
15 controversy in this case; that he was thereupon carefully
16 examined upon oath, and his examination reduced to writing
17 under my supervision; that the deposition is a true record
18 of the testimony given by the witness; and signature of the
19 witness was not waived by agreement of counsel.

20 I FURTHER CERTIFY that I am neither attor-
21 ney nor counsel for nor related to nor employed by any of
22 the parties to the action in which this deposition is
23 taken; and further, that I am not a relative or employee
24 of any attorney and counsel employed by the parties hereto,
25 or financially interested in the action.

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IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal on this _____ day of
_____, 1983.

Notary Public within and
for the County of Madison,
in the State of Illinois.