PLAINTIFF'S EXHIBIT
#338 Tucker

A I don't believe we did, no.

Q Did you run your unknown -- strike that.

Did you run your known samples before 1970?

A Yes.

Q When in 1969 did you run your known samples?

A Probably late 1969. Or in 1969, I am really not exactly sure. How definitive do you want me to be? I mean, you say in 1969.

Q Well, your best recollection.

A In 1969, mid-1969, around in there somewhere.

Q Between mid-1969 and January of 1970 you ran no environmental samples?

A To my knowledge, no, none.

Q Why not?

A Probably because we weren't prepared with the techniques to really go and look at environmental samples.

Q Well, you had run enough known samples to convince you that you could find what you knew was there by mid-1969, correct?

A We were convinced that if we put it there and we ran the samples and we found it, that it was there, yes. It's kind of a developmental thing. My memory is not that clear as to the day or even the month that we began doing

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this and doing that back in 1969. But I am sure it's a matter of record because most of these things were logged in.

Q Your laboratory notebook would have an indication of what sample was run on the day it was done in the lab?

A It would indicate when the sample was received and samples were handled on an A.S.A.P. basis.

Q Did anyone at Monsanto ask you for reports as you were doing samples or ask you for results as you were doing analyses?

A Yes, I think there were reports, but they would all come out in a documented form, either in a memo or a special study, which was in addition to a report form, really a record-keeping form, too.

Q Who got those reports?

A The people who would probably see it, Dr. Keller certainly would receive one, and Dr. Richard, and I imagine Elmer Wheeler in the Medical Department. They would be the prime people. And generally, unless someone else was specifically interested, it would be up to them to distribute them to their people.

Q Was there a retention period for keeping the lab notebooks that would document sample analyses?

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A As far as I know, they have always been kept.

Q Were the lab notebooks that were prepared for purposes of doing the PCB sampling or PCB analyses in existence when you left Monsanto in 1978?

A Yes.

Q Where are those lab notebooks kept?

A I don't know where they were kept. And when I left Monsanto, they were turned over to Dr. Keller.

Q Were they in your possession before you left Monsanto?

A Many of them were, yes. We had a practice, as we filled up notebooks periodically, these would go to the library, if I remember correctly, for microfilming and things of that sort. And then, we would get them back and retain them ourselves. But everything was kept. It was general practice to retain everything.

Q Did you meet with Dr. Richard on a regular basis to discuss PCB matters in the period of '68, '69 and '70?

A Yes.

Q How often would you meet with him?

A Really as often as he deemed necessary or whenever I felt that I had information that was going to be reported. I don't think we had set up an official -- you know, like we

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