

ERRATA SHEET

The City of Bloomington,	)	
	)	
Plaintiff,	)	CAUSE NO. IP83-9-C
	)	
vs.	)	
	)	
Westinghouse Electric	)	
Corporation, et al,	)	
	)	
Defendants.	)	

(Deposition of William R. Gaffey)

I wish to make the following changes for the following reasons:

<u>Page</u>	<u>Line</u>	
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5	16	<u>Change:</u> "Rausch" should be "Roush."
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Reason: Misspelling.

<u>Page</u>	<u>Line</u>	
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7	7	<u>Change:</u> "Lenshaw" should be "Henshaw."
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Reason: Misspelling.

<u>Page</u>	<u>Line</u>	
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22	22	<u>Change:</u> "trail" should be "trial."
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Reason: Misspelling.

Page Line

23 2 Change: "trail" should be "trial."

Reason: Misspelling.

Page Line

38 11 Change: ".035" should be ".05."

Reason: Transcription error.

Page Line

57 10 Change: "close" should be "chose."

Reason: Transcription error.

Page Line

57 14 Change: "Having made no literature
search..." should be "Having made a
literature search..."

Reason: Transcription error.

Page Line

80 21 Change: "manufacture" should be "man."

Reason: Transcription error.

Page Line

88 16 Change: "antidotal" should be "anecdotal."

Reason: Transcription error.

Page Line

89 4 Change: "symtomology" should be
"symptomatology."

Reason: Transcription error.

Page Line

100 11 Change: "Bomgardner" should be "Bumgarner."

Reason: Misspelling.

Page Line

128 22 Change: "That's what they say" should be
 "They say that PCB's may represent a cancer
 risk to humans, not that they do represent
 such a risk."

Reason: To reflect accurately what the
studies say.

Page Line

132 10 Change: "Yes, I do" should be "In fact,
 the authors indicate that [^]these may be a
 risk of cancer, not that there is a risk.
 In any case, I disagree with their
 conclusion."

Reason: The question misstated what the
Brown and Jones studies say.

Page Line

134 5 Change: "Yes" should be "No, he found an
 increase that was not statistically
 significant."

Reason: To reflect accurately what the study found.

Page Line

134 16 Change: "Yes, but a a different cancer site" should be "No, he found an increase that was not statistically significant, and that was at a different cancer site."

Reason: To reflect accurately what the studies found.

Page Line

134 17 Change: "differ" should be "different."

Reason: Transcription error.

Page Line

171 5 Change: "That's what they say, yes" should be "That was the conclusion in their first study, but they made no such conclusions in their second study."

Reason: To reflect accurately what the studies say.

Page Line

172 22 Change: "And with the EPA" should be "And I disagree with the EPA when it uses risk assessment as if it were a scientific prediction of real risk rather than a non-scientific expression of policy."

Reason: To make the answer clear.

Page Line

188 5 Change: "...and in those four studies..." should be "...and if in those four studies..."

Reason: Transcription error.

Page Line

191 4 Change: "That's right" should be "One of the Jacobson studies addressed some neurological problems, but the second Jacobson study did not."

Reason: To reflect accurately what the Jacobson studies addressed.

Page Line

191 10 Change: "Neurological problems" should be
"neurological problems in their first study."

Reason: To reflect accurately what the Jacobson studies addressed.

Page Line

191 19 // Change: "...measured was the baby's..."
should be "...measured in the second study
was the baby's..."

Reason: To reflect accurately what the Jacobson studies addressed.

Page Line

191 20 Change: "That's correct" should be "One of
the Jacobson studies addressed some
neurological problems, but the second
Jacobson study did not."

Reason: To reflect accurately what the Jacobson studies addressed.

Page Line

192 1 Change: That's their conclusion" should be "That's their conclusion in the first study."

Reason: To describe Jacobson studies accurately.

Page Line

193 2 Change: "Sure" should be "I accept that IARC has established criteria and has used those criteria to classify various substances. I do not agree that the label 'probable human carcinogen' accurately describes the criteria established by IARC as Category 2."

Reason: To state accurately my views about the IARC criteria.

Page Line

205 3 Change: "dye" should be "die."

Reason: Transcription error.

Page Line

205 23 Change: "Yes" should be "I disagree that
the EPA's characterization represents a
scientific description of the actual
carcinogenic potential of the substance;
rather, it is a non-scientific policy
decision. Many people in the EPA agree with
me that the EPA's characterization is not a
scientific judgment."

Reason: To reflect accurately the nature
and extent of my disagreement with some
people at the EPA, and my agreement with
other people at the EPA.

Page Line

207 3 Change: "popur" should be "pour."

Reason: Transcription error.

Page Line

209 13 Change: If they have so called it, yes"
should be "If they have so called it, yes,

but as far as I am aware, NIOSH has never classified PCB's as a probable human carcinogen."

Reason: To reflect that the premise in the question - that NIOSH has classified PCB's as a probable human carcinogen - is not correct as far as I am aware.

Page Line

213 19 Change: "Ligginson" should be "Higginson."

Reason: Misspelling.

Page Line

224 19 Change: "Singer" should be "Senger."

Reason: Misspelling.

Page Line

228 12 Change: "...pcb a carcinogen by act of Congress" should be "...pcb a hazardous substance by act of Congress."

Reason: To reflect accurately the Toxic Substances Control Act, which does not refer to PCB's as a carcinogen or make any judgment about PCB's as a carcinogen.

Page Line

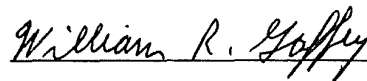
228 16 Change: "PCB's are a carcinogen by..."
should be "PCB's are a hazardous substance
by..."

Reason: Same as preceding change.

Page Line

228 21 Change: "...carcinogen" should be
"hazardous substance."

Reason: Same as preceding change.



Deponent's signature