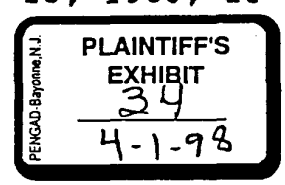
IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

THE CITY OF BLOOMINGTON, INDIANA; THE UTILITIES SERVICE BOARD OF BLOOMINGTON, INDIANA; and MONROE COUNTY, INDIANA, Plaintiffs,	)	
vs.	)	Civ No. IP 83-9-C
WESTINGHOUSE ELECTRIC CORPORATION, a Pennsylvania corporation; and MONSANTO COMPANY, a Delaware corporation, Defendants.	)	

The deposition of W. B. PAPAGEORGE, called for examination by the Plaintiffs, pursuant to notice and pursuant to the provisions of the Federal Rules of Civil Procedure of the United States District Courts, pertaining to the taking of depositions for the purpose of discovery, taken before Arnold N. Goldstine, a Notary Public and Certified Shorthand Reporter within and for the County of Cook and State of Illinois, at 1313 Merchants Bank Building, Indianapolis, Indiana, commencing on June 25, 1986, at the hour of nine o'clock a.m.



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A. Not specifically. Other than Mr. Wheeler covered the activities prior to my arrival in my new assignment then. And later I got up and talked, and this covered the Swedish work, the Dr. Risebrough's report out of California and the like.

And I got up then later in the day that morning and spoke on, as I remember, our plans to pursue this information personally by going to Europe, and also our plans in visiting our customer sites and our review of Monsanto's marketing policies, as to which of the Aroclors to sell and to whom.

So I was kind of forecasting what we knew then as to what we might be doing.

Q. Let me see if I can have a summary of the status at that time. You had this program underway where you were taking back scrap liquid Aroclor, sending it to Findett for reprocessing. Any material that couldn't be reprocessed was being disposed of in landfills by Monsanto, isn't that correct?

A. Yes.

Q. And because you were paying for that,

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Monsanto was paying for that, you didn't like that program and wanted to go to a program where your costs would either get reduced or get down to zero, is that right?

A. That was an objective.

Q. And your ultimate goal, recognizing that landfills were not a long-term solution, was to either recycle it or incinerate it; is that right?

A. That's right.

Q. Was that sequence of reasoning and what you had done and where you were going explained to Westinghouse at that time?

A. Let me think. That was assigned to Dr. Richard on the agenda.

Q. Okay.

A. And he did touch on that.

Q. Did he touch on --

A. Yes.

Q. -- the whole idea of trying to keep as much out of the environment as possible?

A. Yes.

Q. So he was saying to Westinghouse, try and keep it from being discharged into the environment; is that right?

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A. All right. Yes.

Q. Did you ever develop a solid waste destruction system?

A. Yes.

Q. Is it in operation now?

A. No.

Q. Why not?

A. We could not find enough support for the use of that unit to justify building it.

Q. Not enough customer base?

A. Correct.

Q. But it is technically feasible, is it not?

A. We demonstrated it. Yes.

Q. So that the goal of destroying solid wastes through -- pcb contaminated solid wastes through incineration, has been demonstrated to be technically feasible, isn't that correct?

A. Yes.

(The document above-referred to was marked Bloomington Deposition Exhibit No. 128 for identification.)

Q. Directing your attention to what has been marked as Exhibit 128, which is a trip report

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