PLAINTIFF'S EXHIBIT
#389 Tucker

A Yes.

Q Which is more difficult?

A The sediment samples are more difficult simply because of the composition of the matrix you are dealing with.

Q Did you do any other type of sampling or analyses besides water and sediment?

A Yes, I believe we obtained some fish samples from the Mississippi.

Q Why were you interested in doing PCB analyses for fish?

A Well, if I recall correctly, I believe Soren Jensen had reported on eagle feathers or something of this sort and had speculated a number of things. And also, you could look at DDT, which is a very similar kind of compound, so we were interested to see if they were in the fish, too.

Q Did you confirm they were in the fish in your opinion?

A Yes.

Q Did you compare the levels of PCB's in fish as compared to the water?

A Yes.

HARTOLDMON0043217

Q Did the fish have higher levels of PCB's than the water?

A Yes, I would say so. I mean, that would be a rather obvious situation, but yes.

Q Why would that be obvious?

A Well, first of all, PCB's are not very soluble in water, so if you take a water sample, that does not have much dendritic-type of materials in it, so then you are not going to see much about, if anything, about the solubility of the PCB's in the water, which is quite low. They are very hydrophobic.

Q Why would you find higher levels in fish?

A The reason that eventually came out of it was a little thing called bioaccumulation. In other words, fish are -- you know, they breathe water just like you breathe air. So, as they breathe the water, of course, if there are PCB's in it, it's going past their gills.

Q And they accumulate PCB's?

A I believe that has been quite well established. Yes, they do.

Q When you were doing the analyses for PCB's in fish at the time you did those analyses, did you become aware that PCB's bioaccumulated in fish?

HARTOLDMON0043218

A Yes.

Q About what period of time were you convinced that PCB's were in fact in water, sediment and fish?

A Around the Krummrich plant when we analyzed there. Around there when I analyzed the Mississippi. The PCB's -- as we established earlier, that's the time I became convinced there were PCB's in the water and the fish and the sediment around the plants where they were manufactured.

Q Those were the first environmental samples that you ran?

A Yes.

Q Were you asked by anyone at Monsanto to give an opinion or give your recommendation on any action Monsanto should take as a result of your findings?

A The only --

MR. SCHINK: I object to the form of the question. It assumes that action was taken after those findings and not before the findings. And you have not established when this work was done, Miss Oliver, with any degree of specificity.

MISS OLIVER: I believe the record is clear on that, Mr. Schink.

MR. SCHINK: I object to the form of the

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