

STATE OF ALABAMA
IN THE CIRCUIT COURT OF CALHOUN COUNTY

MARS HILL MISSIONARY
BAPTIST CHURCH, et al.,

Plaintiffs,

CIVIL ACTION NUMBER

versus

CV-96-243

MONSANTO COMPANY, et al.,

Defendants.

DEPOSITION OF WILLIAM B. PAPAGEORGE, P.R.

The deposition of WILLIAM B. PAPAGEORGE, P.E., was taken before Deborah Salers Garrett, Certified Shorthand Reporter, Registered Professional Reporter, as Commissioner, commencing at 1:20 p.m. on March 31, 1998, by the Plaintiffs, at the law offices of Lightfoot, Franklin & White, 300 Financial Center, 505 North 20th Street, Birmingham, Alabama, pursuant to the stipulations set forth herein.

Regional Reporting Service, Inc.
755 Walnut Street
Gadsden, Alabama 35901-0755

APPEARANCES

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EXHIBITS

Plaintiffs'	Marked	Offered
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No other exhibits were marked for identification, offered or attached as exhibits hereto.

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- 1 MR. ATKIN: Thank you for
2 clarifying that.
- 3 Q. We will mark for identification
4 purposes, as Exhibit Twenty to your
5 deposition, a document bearing Bate's
6 number MONS 098414, dated January 29th,
7 1971. It appears to be a memorandum
8 from Mr. Papageorge to Mr. Savage, with
9 several recipients.
- 10 (Plaintiffs' Exhibit Number
11 Twenty was marked for
12 identification.)
- 13 A. I have read the exhibit.
- 14 Q. Okay. By January 1971, you had
15 concluded that high levels of PCBs would
16 continue to exist in the plant waste
17 streams because of the PCBs trapped in
18 the soil and the sewer system, correct?
- 19 A. That is correct.
- 20 Q. Okay. What did you mean when you said
21 that high levels would continue because
22 of the PCBs trapped in the soil?
- 23 A. What I had in mind was the fact that

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- 1 sources can be economically
2 impractical." Do you see that?
- 3 A. I do.
- 4 Q. What did you mean by that?
- 5 A. I was theorizing in a way what kinds of
6 technology could be applied to extract
7 the PCBs in soil. And with my quick,
8 off the top of head kind of study, I
9 visualized that this could be a
10 monstrous task in terms of equipment and
11 successful achievement. So I quickly
12 extrapolated that into an economic kind
13 of thought, and I was hoping that by
14 getting others involved we could get
15 perhaps a different perspective that
16 could still get to the solution without
17 my high costs estimates, which were, as
18 I said earlier, not based on any
19 highfalutin calculations or science. It
20 was just a gut feel I had that this
21 could be a monster.
- 22 Q. Okay. You also concluded that the PCB
23 contamination in the plant was so

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- 1 PCBs tenaciously hang onto soil
2 particles like little magnets. And
3 since they aren't destructible in the
4 environment, they will be there forever,
5 such that any time a water flow occurs
6 in this soil, the chances of that soil,
7 with its PCB being transported, will
8 remain. And later if a sample of that
9 contaminated water is taken, sure
10 enough, PCBs will be found in it.
- 11 Q. Which soil were you referring to?
- 12 A. Well, this was soil in the plant where
13 previous contamination had occurred,
14 like an overflow of those neutralization
15 pits, for example.
- 16 Q. Okay. And what did you mean when you
17 said that the PCBs were trapped in the
18 soil?
- 19 A. It is another way of expressing my
20 magnetism the PCB has for surfaces,
21 clinging to them.
- 22 Q. In the last sentence of the second
23 paragraph you state, "Cleanup of these

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- 1 widespread that all of the plant's
2 effluents must be treated; is that
3 correct?
- 4 A. Yes.
- 5 Q. And that this would result in a system
6 more complex and costly than anyone had
7 anticipated, correct?
- 8 A. Yes.
- 9 Q. You also said the type treatment needed
10 approaches tertiary treatment -- that's
11 t-e-r-t-i-a-r-y -- which at Krummrich is
12 scheduled for completion by 1973.
- 13 What did you mean by tertiary
14 treatment?
- 15 A. There was at the time a proposal made by
16 the technical community in Monsanto,
17 which included researchers in the
18 engineering department, to subject any
19 contaminated soil to a three-step
20 process. That is where the word
21 "tertiary" came from.
- 22 I at this point in time don't
23 recall all of the details. But it

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