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EUGENE WRIGHT,
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Exhibit 1 Notice of Deposition . . . . .
Exhibit 2 Letter, January 23, 1969 . . .
Exhibit 3 Letter, May 7, 1970 . . . . .

The deposition of EUGENE WRIGHT, called as a witness at the instance of the Plaintiffs, for use pursuant to the Alabama Rules of Civil Procedure, taken by agreement on the 12th of January, 1999, at the offices of Angel and Associates Court Reporting, at 1014 Dallas Road, Suite 102, Chattanooga, Tennessee, before Rebekah Archer, NCRA Registered Professional Reporter, Notary Public and Court Reporter.

_S_ T_ I_ P_ U_ L_ A_ T_ I_ O_ N_

The Deposition is being taken by agreement of counsel for the plaintiff and the defendant. It is agreed that the deposition shall be taken in machine shorthand by Rebekah Archer, Notary Public and Court Reporter, that the signature of the witness to the completed deposition is waived, and that the witness may be sworn by the Notary Public.

It is further agreed that all formalities as to caption, notice, certificate and mode of transmission are waived, and that the deposition is taken subject to the usual exceptions as to irrelevancy, incompetency and immateriality, which are reserved to the hearing of the cause, except as to the form of the deposition.

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(Whereupon, at the commencement of the deposition, Exhibits 1, 2 and 3 were marked for identification by Counsel and will be attached hereto.)

MR. PECK: Usual stipulations?

MR. ASHLEY: Sure.

MR. PECK: That means you have the right to read and sign it or you can waive it. People typically waive it, it's your right. In other words, if you waive it you just trust the court reporter to get it all down. If you want to read and sign it or we may reserve judgment on it depending on how long it goes and how many technical words you say. Why don't we do that?

THE WITNESS: Yes, I would think so.

MR. PECK: If it gets technical we may want you to read and sign it to help the court reporter.

MR. ASHLEY: Just so we are clear, you say the usual stipulations, just pursuant to the Alabama Rules of Civil Procedure?

MR. PECK: Yes, exactly.

* * *

EUGENE WRIGHT,

a witness, called at the instance of the plaintiff, having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. ASHLEY:

Q Mr. Wright, would you state your name for the record, please?
A My name is Eugene Wright.
Q Could you give me your current address, please?
A 7914 Orchard Valley Drive.
Q And what city and state?
A Chattanooga.
Q Tennessee?
A 37421.
Q Mr. Wright, I'm going to give you a document here marked Exhibit 1 which is a notice of deposition for today, and have you seen that document before?
A Yes.
Q Have you read the entire document?
A Yes.
Q Have you -- are you aware that certain documents were requested for you to bring today to this deposition?
A Yes.
Q And are there any such documents in your possession that were requested in this notice?
A No.
Q Okay. So you -- so have you brought no

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documents today to this deposition?
A (Witness shakes head negatively.) No.
Q You have to –
A Correct, I brought no documents.
Q Okay. Now, it's helpful for everyone if you can answer outloud for the court reporter. And have you ever had a deposition taken before?
A Yes.
Q And when have you had a deposition taken before?
A A couple of months ago.
Q Was that – what case was that?
A That was a contract dispute case involving the city and some contractors.
Q Did that involve Monsanto in any way?
A No.
Q Have you ever had a deposition taken before that was taken in a case that involved Monsanto?
A No.
Q Just so we're clear on a deposition, you're sworn under oath to tell the truth and I'm going to be asking questions, if you at any time don't understand any of the questions feel free, please, let me know and I will do my best to rephrase them.
Could you give me, Mr. Wright, your educational

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history starting with high school.
A I graduated from high school at Anniston High School in 1957 and I graduated from Jacksonville State University in 1967.
Q What was your -- what kind of degree was that at Jacksonville State?
A Chemistry.
Q Was that a Bachelor of Science Degree in chemistry?
A It was a BS in chemistry.
Q Do you hold any other degrees?
A No.
Q Have you received any kind of special training in pollution control?
A Yes.
Q And when was that?
A Well, it started with Monsanto back in the mid-60's.
Q Was that – was there a specific course or are you just referring to continual on-the-job training?
A Primarily continually on-the-job training, but there was a training course in Cincinnati at the WPCF Laboratories there in Cincinnati back in the 60's.
Q Could you just tell me what is WPCF Laboratories, do you recall?

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A That was one of their – of the predecessors to the EPA, one of their laboratories, it was a research area or a research facility and they taught courses to various people who were involved in pollution control. And during those days it -- the course that I took was a biological treatment, I believe, of wastewater and sludges if I recall correctly.
Q Did you say it was the mid-60's?
A It would have been in the mid-60's, yeah.
Q And so is it your understanding –
A Mid to late 60's, I don't know the exact dates.
Q So is it your understanding that WPCF Laboratories was a governmental agency?
A Yes, it was a governmental agency.
Q And were you born in Anniston?
A I was born in Gadsden.
Q When did you move to Anniston?
A Sometime during the second World War, I'm not sure exactly, '42, '43.
Q Can you, to the best of your recollection, tell me each address that you lived at in Anniston?
A Well, we didn't move around very much, let's see. The first place I lived in Anniston, I cannot tell you the exact address, but it was located on the military base there at Fort McClellan.
When the war ended we moved to Glade Road in

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Sacks which is right outside of Anniston. I lived there until I was out of high school and married and then moved to Arrow Street.
Q About what year did you move to Arrow Street?
A About '62 or '63.
Q And did you – was that your last address in Anniston?
A It was.
Q And I'm somewhat familiar with Anniston, can you give me a general idea of where Arrow Street is in Anniston?
A Where it is in Anniston?
Q Yes, sir.
A Yeah, if you take the highway to Gadsden, after you get off the Highway 21, you get onto 431, go out 431 maybe two or three miles, there's a street that Y's off of 431 and that is Arrow Street. It runs over to another – which I don't remember the name of it -- it goes over to -- no, the little shopping area there right across from the middle gate of the Army Post, I don't recall that community but that is where it is.
Q About how many miles is that from the Monsanto Plant?
A Eight to ten.
Q When did you move away from Anniston?

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A In 1973.
Q And where did you move to?
A Chattanooga.
Q And you have lived in Chattanooga ever since?
A That's correct.
Q Ever since?
A (Witness nods head affirmatively.)
Q Where -- strike that.
When did you first start working for Monsanto?
A In August of 1960.
Q Was Monsanto your first employer after graduating from college?
A I was not graduated from college when I went to work for Monsanto. I actually went to school about the first -- well, I worked there a couple of years and then went to school and worked.
Q What was your first position at Monsanto?
A Laboratory analyst.
Q What were your responsibilities in that position?
A To perform laboratory analysis on in-process samples as well as finished goods.
Q By laboratory analysis do you mean analytical studies to determine the purity of product samples?
A In process, yes. Was it being made according

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to the way it should have been made, were the properties in line with what they were supposed to be, was the chemistry right as it was supposed to be, those types of things. And then the finished products, we would analyze those to make sure that they met the specifications.
Q What kind of instruments did you use in your analytical work?
MR. PECK: When he first started?
BY MR. ASHLEY:
Q Yes, at your first position,
A What kind of instruments?
Q Yes, sir.
A We use a standard laboratory glassware, heaters, titrations, burettes, mixers, hydrometers; it was a lot of wet chemistry, colorimeters.
Q What was your next position at Monsanto?
A After I graduated from college I went to work in the Process R&D Group.
Q And what was your responsibility -- first of all, what was your title in that position?
A I honestly don't recall, I don't recall.
Q What were your responsibilities in that position?
A Well, I would work with a chemist or one of the engineers on some special project, such as the upgrading of

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the electrical property on the aroclors, we did a lot of work on that. We did work on the parathion process as well. We did some work on the wastewater treatment facility for the Niran Plant, trying to figure out ways to get it where you could switch it from one product to another product, how did you do that, gradually bringing, you know, a new product on line, that kind of thing.
Q And about what year did you start at this position?
A Pollution Control Engineer?
Q No, I'm sorry, the second position in R&D?
A It would have been probably mid '67, early to mid '67.
Q And how long did you stay at this position in research and development?
A I do not remember that. I moved into the Pollution Control Engineer's job after that. But you could probably date that by the death of a guy, Gene Coley. I don't remember when Gene was killed. It was maybe a year after that, maybe.
Q Can you spell his last name for me?
A C-O-L-E-Y, G-E-N-E.
Q Was he the Pollution Control Engineer before you?
A He was.

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Q And so upon his death you became Pollution Control Engineer?
A That's right.
Q And what were your responsibilities as Pollution Control Engineer?
A It was to perform samplings, oversee the laboratories that we later developed for the PCB problem, report to the states, do the reports, work with the various operating divisions to -- if there were perceived or real pollution problems, we worked with them to try to eliminate those.
Q When you began working for Monsanto in 1960, is it your recollection that Gene Coley was the Pollution Control Engineer?
A Not at that time Gene was not, no. Gene and I went to work almost the same day and that position wasn't created until four or five years down the road I guess, maybe in '65 or something like that.
Q Who was your superior when you were Pollution Control Engineer at Monsanto?
A Mr. Taffee at first, Bill Taffee.
Q Can you spell his last name?
A William, W-I-L-L-I-A-M, T-A-F-F-E-E. And later on I worked for Joe Landwehr some, I worked for Gerald Miller, and for Toby Bell.

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Q Who gave you your directions with respect to the sampling program for, I'm sorry, strike that. Describe for me your duties in collecting samples and testing for PCB's around the Monsanto Plant and pollution control manager -- excuse me, engineer?
A Would you repeat that one time, please?
Q I'm sorry. Describe your duties in sampling and per conducting tests for PCB's around the Monsanto Plant as Pollution Control Engineer?
A Okay. Well, my duties were to either to collect samples, and this was a daily thing, either to collect them or to see that they were collected by the operating personnel. When we would first start a program I would do it myself until we were comfortable with it, we thought we had all of the bugs worked out and then we turned it over to the plant personnel so that we could work on another area. All of the data funneled back through me, the data from the tests, the tests results. I prepared reports to the regulating agencies, to the company, to -- I provided input into planning discussions to attack problems, you know, the way to go about attacking a problem. Those were pretty well my duties.
Q Who directed you to conduct these tests for PCB's?
A I suppose that that came from Mr. Taffee, but I honestly can't remember the first discussion that was had on

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that.
Q Do you know why you were instructed to undertake this project to test for PCB's around the Monsanto Plant?
A I think it was precipitated by an article that Dr. Reisborough had written about that these things were, you know, they were being found in a lot of places. They were -- I recall the Peregrine Falcon egg being a big issue because they were almost becoming a distinct spieces and they could find PCB's in their eggshells, and that was about the biggest thing that we knew at that point in time.
Q Do you know in what publication this article appeared?
A Not now I don't, no.
Q Did you take liquid samples and run tests on the liquid samples?
A We did.
Q And, now, who performed these analytical studies on the samples that you would take?
MR. PECK: In what time period, in the beginning?
BY MR. ASHLEY:
Q From the beginning on.
A From the beginning, I cannot tell you the individual because I don't know, I don't remember. But from

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the beginning, we didn't -- the methodology, the analytical methodology, was not developed to measure these things down into the ranks we were starting to talk about. You have got to remember, we're in 1968, I guess, '67, '68, and people are talking to us about parts per million and parts per billion and we don't know how to do that. So, we -- the original samples that were run, some of the original stuff that was run was just total organics, it was an extraction and I don't recall the exact procedure, but it was a very gross test to measure the total of the organic constituent in the water, not specific for the polychlorinated biphenyl materials, the PCB's. Those were run by the people in the quality control laboratory.
Q Within Monsanto?
A Yes.
Q At times in the early days we would furnish samples to central research in St. Louis and they were working on the gas chromatograph electron capture method for measuring it at much lower concentrations than we knew about.
Q And when did you -- can you tell me when you started sending it out to the outside agency for gas chromatograph analysis?
MR. PECK: Object to the form because I think you may have misunderstood, Steve, and he said he sent them St. Louis, he didn't mean outside.

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THE WITNESS: Right.
MR. ASHLEY: Okay.
BY MR. ASHLEY:
Q I understand, I'm sorry.
A Yeah, St. Louis, central engineer, central research.
Q So when did you start sending the samples to St. Louis for GC analysis?
A I would have to see some papers to know the exact time, but it was probably in '68.
Q Do you know if those -- strike that.
Do you know if the capabilities of the GC analysis at that time were such that you could analyze to part per million or part per billion?
MR. PECK: Let me object to the form of the question. But, Buckey, don't guess as to dates. There are documents to indicate specific dates and, you know, if you don't know the date don't guess because you'll confuse us all and have us looking for things that don't exist.
I'm sorry, but I wanted to caution him.
THE WITNESS: I'm sorry. I don't know those exact dates. Ask the question again.
BY MR. ASHLEY:
Q Sure. What were the capabilities of the GC analysis in terms of the ability to quantify -- sorry, strike

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that.
What were the capabilities of the GC analysis at that time?
A Well, I think it was still in the research phases. Now, you really have to address that to somebody else that was there doing it, but it took them a long time to turn samples around. There were times when they would be qualified.
Q Were the results in part per million?
A The original -- some of the original results were in parts per million, yes.
Q Were there any results in parts per billion?
A Later on, yeah.
Q Now, with regard to the liquid samples that you would take, to the best of your ability tell me each point around Anniston in which you collected liquid samples for analysis for PCB's?
A Well, the original samples that we collected would have been from the plant or from the neutralization basin pit effluent because that was the point where the aqueous phase, the water phase left the plant, that would have been the first place that we would have sampled.
We later went back to the head of the neutralization or influent end of the neutralization basin. We worked our way back up into all of the processes. We did

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some work in Snow Creek, some work in the Choccolocco Creek. Those were primarily the --
Q Was the neutralization pit, I think is what you called it, was that the only exit for all liquid waste from the Monsanto Plant?
A No.
Q What other exits were there?
A There was an exit for the parathion process on the west side of the plant which was tied into the City's sewer system. We actually had a biological treatment plant over there. There was an exit over there, and then -- but this was the only exit to my knowledge for the PCB's.
Q Was aroclor the only product containing PCB's produced in the Monsanto Plant at Anniston?
A To my knowledge it was.
Q So that neutralization pit was to your knowledge the only exit for liquid waste from the PCB process?
A That's correct.
Q Where did waste coming from that neutralization pit go from there?
A When it left the neutralization pit?
Q Yes, sir.
A It went into a tributary of Snow Creek.
Q So, to your knowledge all of the liquid waste coming from that PCB process would eventually end up in Snow

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Creek?
MR. PECK: Object to the form of the question.
You can answer. I object to the form of the question, it assumes that there is no treatment whatsoever, but you can answer the question.
THE WITNESS: Ask the question again.
BY MR. ASHLEY:
Q I'm sorry, that's okay. All of the liquid waste generated from the aroclor process would eventually end up in Snow Creek, correct?
MR. PECK: Object to the form of the question, it assumes there is no treatment whatsoever.
THE WITNESS: After treatment.
BY MR. ASHLEY:
Q So the liquid waste from the aroclor process would go for treatment to the neutralization pit?
A That's correct, and then out.
Q And then from the neutralization pit to Snow Creek?
A That's correct.
Q What exactly was done -- I'm sorry, strike that.
What was done --
A That was just a thought, you can't strike that.
Q I know. I tell you, I hesitate to ask this

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one, but . . . What was done at the neutralization pit, what was the treatment process that was done to the liquid waste coming from the aroclor process?
A Okay. The equalization pit --
MR. PECK: Neutralization.
A Yeah, I keep going back to modern date terms, we have equalization. But the neutralization pit was put there as exactly that, a neutralization facility. We wasted acid out of the plant. At times we made more acid than we could sell, so we wasted acid; this was hydrochloride acid, buratic acid, builder's acid, the kind you clean brick with. That was neutralized by calcium carbonate or limestone in that pit. The PH was raised on it. I mean, we didn't put PH's out of the plant of one or two, we put PH's out at -- I don't recall the numbers, but they were up much closer to the neutral of seven. They weren't seven, but they were up closer to seven.
Q All right. So --
A We were concerned about that acid.
Q So the point, strike that, I'm sorry.
So the purpose of the neutralization pit was to neutralize hydrochloric acid generated in the aroclor process?
MR. PECK: Object to the form of the question, it didn't talk in terms of time, but you can answer.
BY MR. ASHLEY:

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Q I'm sorry, what I'll do I'll try to tighten it up on time.
When you began your position as Pollution Control Engineer, the sole purpose of the neutralization pit was to neutralize hydrochloric acid generated during the aroclor process; is that correct?
A That is correct.
Q Was --
A Neutralize waste hydrochloric, not all of it but waste.
Q Was anything -- at that time was anything chemically done to any PCB's that might be in that liquid waste going to the neutralization pit?
A You mean, were the aroclors or the PCB's chemically altered in that process?
Q Correct. -
A I would think not.
Q Now, did the processes going on in that neutralization --
A They --
Q I'm sorry.
A Now, there was some physical treatment of them which we found out later, it was actually a removal of aroclors or PCB's from in that neutralization basin.
Q Now, how is that?

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A By absorption on to the real fines that were left in there.
Q What are the real fines?
A Well, they are inert materials; silica, silica dioxide, sand, very fine particles, almost a dust size. And there was, we found out later, there was PCB's and aroclors absorbed on to those fine materials, so there actually were removals of PCB's from the influent to the effluent of the neutralization basin.
Q When was that discovery made?
A Again, I wouldn't want to give you a date but there are documents that show those dates.
Q When -- in your entire time there as Pollution Control Engineer at Monsanto, were the processes that went on in that neutralization pit ever altered or changed?
A Were they changed?
Q Yes, sir.
A Yes.
Q When were they changed?
A I can't tell you that either, but the documents, I believe you'll have some documents that will tell you that.
How were they changed?
Q Yes, sir.
A Well, for one thing we studied the old

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neutralization pit and came up with a design for a new one that we felt would be more efficient at not only neutralizing the acid but also in removing the organics, or the aroclors, or the PCB's and that was done and was built. There actually was two of them, I believe, when the plant was shut down.
Q Was there any gaseous waste generated by the aroclor process?
A Gaseous waste?
Q Yes, sir.
A Minimal amounts, minimal amounts.
Q What chemicals would have been contained in that gaseous waste?
A I don't have information that tells me the exact makeup of that gaseous waste, but knowing the properties of the materials that we were dealing with I would think that the majority of those gaseous wastes would be the ones with the lower, the lower chlorine contents, maybe the mono and maybe the dichloryl biphenyls. Those are not the polychlorinated biphenyls, those are just lower chlorine containing materials simply because of the vapor pressure of them and the melting points and those kinds of things. I mean, I would assume that, I have never seen any data that proves that or disproves it, and I'm certainly not an expert in that field.
Q How would gaseous waste generated from the

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aroclor process exit the plant?
A Theoretically it wouldn't because it would be scrubbed by the jets and brought back into the liquid phase, brought back down with the liquid at least to the point of solubility. Maybe if the gas stream were higher than the solubility in the amount of water that you were quenching it with you might have some losses.
Q Was there any solid waste generated from the aroclor process?
A Yes.
Q What chemicals would have been contained in that solid waste?
A These would have been what we called at that time montars, these were the actual -- once the material had been chlorinated, distilled and you had a still bottom left in it, that was a very high melting point, black material that looked like tar and it was montar, but it was drummed and moved to the landfill.
Q So all solid waste generated from the aroclor process would be landfilled on Monsanto's site?
A Yes. To my knowledge it was, yeah.
Q Are you aware of any other manner it could have been disposed of?
MR. PECK: Solid waste?
BY MR. ASHLEY:

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Q Yes, sir, solid waste.
A Solid waste would have been landfilled. We burned some pallets, you know, that was a solid waste material, but those things were burned. But the actual still bottoms, solid waste was actually put into the landfill, yeah.
Some of the liquid waste were reworked back through the process. I mean, we are dealing with a product here, we're not dealing with something that you just throw away. This is a product that we manufacture that cost money and we were in the business to, you know, increase our yields all the time. So it wasn't -- if we got a couple of drums of something that was off spec or even a whole tank, we could rework it and make the next highest material out of it.
There are people in production that can address that better than I can.
Q Now, what tests were performed on the product to determine whether it was off spec or not?
A I remember the first test was actually the specific gravity, that was the measure of, of course, the weight of the material, and that was directly related to the amount of chlorine that was in the material that was in the material which was the number one parameter that you were trying to meet. You know, you were trying to get it chlorinated to a certain percentage and you checked that by specific gravity, you did it by refractive indexes, you did to

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see if it was stable. You did what we call a chlorine stability test where you heat it up and let it sit there, I don't recall, 12 hours maybe, and bubble into a little jar and then you go and titrate that and see if you could find any free chlorine in it.
We had some other -- more other tests to see how strongly the chlorine was bound to it. Viscosity, the higher you chlorinated it, the thicker it got, those were the prime ones that I -- flash points, the melt points in the case of the solid materials, those kinds of things.
Q Was the manner in which waste generated from the aroclor process disposed of at the Anniston Plant identical to the way it was disposed of in the Krummrich Plant in Illinois?
MR. PECK: Object to the form of the question, no foundation, I don't know if he knows what happened in Illinois. Go ahead.
THE WITNESS: I don't really know what went on at the Krummrich Plant. I -- there was some differences in the way that some of the thermal heat systems was handled in the two places, I remember.
They would drop it to the sewer at Krummrich, we didn't do that, we drummed it. We didn't throw away any -- there was no intentional sewering of material. Now, it doesn't say that there weren't losses of material, there were

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from pump leaks, line ruptures and those kinds of things, but there was no direct dumping of something into a sewer.
MR. PECK: When you say material, what do you mean, you mean aroclor?
THE WITNESS: Aroclor, yeah.
MR. PECK: I'm sorry.
BY MR. ASHLEY:
Q Didn't the Krummrich Plant in Illinois have an incinerator in which it disposed its PCB wastes?
A I don't know. I heard that it did but I heard that there were problems with it. I have no firsthand knowledge of that.
Q To your knowledge was the general public in Anniston ever informed of Monsanto's disposal methods regarding its PCB wastes?
MR. PECK: Object to the form of the question.
THE WITNESS: No, I don't think so. I mean, there was -- I mean, we were dealing with a -- with PCB that we didn't really understand why there was so much concern over these very low concentrations. We had people who were working in it a million parts per million, in 100 percent material and we had never seen any -- I have worked with it. I did samples the whole time I went to college on my own material by myself in the laboratory, we didn't have a concern about PCB's. I don't mean to say that we just -- we didn't care and we

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indiscriminately threw it around, we didn't do that because it was money to us. But we weren't afraid of PCB's, the people in the plant were not afraid of that. And to talk about 25 or 30 or 500 parts per million in a water column in a drainage ditch, we didn't see that that was something that we should disturb everybody with, no.
Q Did you take --
A Remember, this is 1968 or in the late 60's. It is a different pollution control environment then than now.
Q Did you take any soil samples for tests for PCB's?
A Yes.
Q Now, to the best of your recollection tell me each location in which you took soil samples.
MR. PECK: When you say soil, do you include sediment in that.
MR. ASHLEY: Sediment, yes, sir. All forms of solid samples.
THE WITNESS: Yeah.
MR. PECK: Dirt.
THE WITNESS: We took some in the little tributary to Snow Creek that was right across the highway or right at the affluent from the neutralization basin, and we took some samples, I think one, I don't remember the exact numbers but we took samples down through that little tributary

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and then in various spots as Snow Creek went from the plant to Choccolocco Creek. I think probably the next samples that we took were in a little community there called Glen Addie. And then we took some right at the confluence of Snow Creek and Choccolocco Creek, took some upstream from up Choccolocco Creek from the confluence of Snow Creek, and some at 20, 25 and all the way down to the Coosa River.

Q Did you ever take any samples from around the landfills in which PCB waste was disposed?

MR. PECK: Soil or sediment?

MR. ASHLEY: Yes, soil or sediment solid samples.

BY MR. ASHLEY:

Q Did you take any soil or sediment solid samples from near or on the landfills in which PCB waste was disposed?

A I took some water samples but I don't recall any mud samples.

Q You took water samples near or on the landfills?

A Below them, yeah.

MR. PECK: Did you say below them?

THE WITNESS: Below, yeah.

BY MR. ASHLEY:

Q And do you recall exactly which landfills were used for PCB wastes?

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A I would have to assume but, no, I don't recall. There wasn't but one I didn't think.

Q Now, did you ever take any atmospheric samples for testing for PCB's?

A Yes, we did.

Q Tell me to the best of your recollection exactly what locations atmospheric samples were taken.

A I can't remember exactly where those things were taken but there were some taken, they were taken at various process points in the aroclor department. Anyplace where there was an opening with a vent, you know, where there was an open space. I think there was some taken in the ACL department, maybe out of the -- I can't remember the exact processes, it has been a long time. But anyplace that we felt like -- or that I felt like -- that there would be a release to the atmosphere, we took some samples.

Q Starting from the beginning of your position as Pollution Control Engineer all the way to the end, describe for me all of the analytical studies that you're aware of that were conducted on these samples that you would collect. Sort of go through a, I guess a timeline or an outline of the evolution of your analytical work, if you could.

MR. PECK: Object to the form of the question, because I guess I'm not sure what you're asking for because he didn't do the analytical work, he sent that to somebody else.

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So I'm not sure what you're trying to get at.

MR. ASHLEY: I'm just trying to get at what kind of analytical work was done, for instance, this will help --

BY MR. ASHLEY:

Q When you began your position as product -- I'm sorry, Pollution Control Engineer, was gas chromatography available to you?

A Gas chromatography was available as a tool for the parathion department. Gas chromatography was not available to analyze the aroclors for the PCB content. We had to go by those later and actually put them into clean laboratories and learn to use them.

Q Why were the --

A After --

Q I'm sorry.

A After Scott Tucker developed the methodology.

Q Why were the GC's available for the parathion and not for the aroclor?

A They were a different type, it took a specialized type of GC to do the PCB's. The others were purely hot wire detectors, the material would pass across the hot wire and you could cool that wire and you would be able to measure the curve that passed by there and that was a fairly simple gas chromatograph, those were the kind we had.

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The one for the PCB's was an electron capture where it actually looked at the chemicals, it heated them up and separated them and it looked at the halogens so that you could tell as this organic material passed through it, the chlorine, the increase in the chlorine you would get distinct different curves. And that was not available until, this is -- this was what Scott Tucker was working on in St. Louis, and once he had it developed then we knew what to buy and we bought and put them into, you know, clean labs. So that is kind of the history of the analytical methodology.

Q Okay. So before that methodology was developed by Scott Tucker, what kind of instrumentation was used to do the analytical studies on your samples?

A On -- it was a method that was developed there at the plant I mentioned a little while ago you, take the sample and extract it. We knew it was an organic material, you could extract it with an organic solvent and cook it down, weigh it, or I don't remember what the actual detections were, but I don't recall the exact -- I don't think I ever did the actual analysis so I don't recall that, but it was a method that was developed by some of our chemists there at the plant. And it was called a total organics method.

It measured everything that was soluble in the solvent that we used. It gave you a much higher number than the PCB number that you were -- that the interest was starting

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to develop for because it had everything.
Q Once Scott Tucker developed the methodology for GC analysis, was that the only instrumentation used for analytical studies for your PCB samples?
A Yes.
Q And --
A Instruments, we had one and then we bought another one.
Q So were all of the analytical studies on GC's done in St. Louis or in Anniston or a combination or an outside agency?
A They were done in combination. A majority of the work once we got, once we developed the capability there in Anniston, the majority of the work was done there. Now, if there was a piece of data that we questioned and we had some more of the sample we would ask maybe Scott to run it through and try to see, you know, if we were -- who was right. But the vast majority of the data was generated at Anniston once it became a routine test.
Q Who conducted those analytical tests?
A The primary guy who conducted those was Don Turner.
Q Would the results from all of those analytical tests be preserved by Monsanto or would those results largely be discarded.

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MR. PECK: Object to the form. You mean preserved to this day or preserved at the time. If it is to this day, I object. He can't possibly know that, he left in '72. If what he did with it back then, then he can.
BY MR. ASHLEY:
Q Sure. What were your retention practices with regard to the results that y'all generated in those analytical studies?
A Oh, they were kept and they were filed. Now, what happened to them in '72 when I left, I don't know.
Q Were those analytical --
A You know, that was still an ongoing study so nobody would have purged their files or that kind of thing until the study was completed. I mean, you wouldn't have transferred it, you were still working on it.
Q Who did you report your results to?
A Who did I report my results to?
Q Yes.
A Internally or externally?
Q Both.
A Both. Internally, I reported them to Mr. Taffee if he was my boss or Gerald or whoever I was working for at that point in time. Externally, we reported them to the Alabama Water Commission.
Q So those are the only people or entities that

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you directly reported your results to, correct?
A That is correct.
Q To your knowledge, did the sampling and analytical studies ever cease during your time as Pollution Control Engineer?
A The sampling and the analytical studies, did they cease during my time?
Q Yes, sir.
MR. PECK: Are you referring to the arocloration or the PCB issue?
MR. ASHLEY: Yes, sir. I'll rephrase it.
BY MR. ASHLEY:
Q In other words, did you ever stop taking samples for analytical studies during your time as Pollution Control Engineer with respect to PCB's?
A No, I mean there might have been gaps in the data, there might have been a day when the sampler froze or the sampler, the hose ran out or the operator didn't collect the sample. I mean, there were some gaps in the data but, no, they were not suspended during that period of time, no. Too important of an issue.
Q So when you left in 1972, to your knowledge that project continued at Monsanto?
A To my knowledge that project continued.
Q Why did you leave Monsanto in 1972?

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A Because the decision had been made to shut down the aroclor facility sometime in '71, and Monsanto offered me a job going back to doing what I had been doing for four or five years and I chose not to do that. I didn't want to do it anymore, I wanted to do something else.
Q They offered you another job in Anniston?
A Yeah.
Q And what kind of job was that?
A Back to the laboratory, back to where I started. They were cutting people back and, you know, it was a roll back.
Q Who took over your position as pollution engineer when you left in 1972?
A I have no knowledge of that.
Q Was that position continued after you left or was it terminated?
A I don't know but I think that position was probably merged with another.
Q In your position as Pollution Control Engineer did you do anything else other than gather these samples and have them analyzed for PCB's?
A Yeah, I investigated complaints, I did air sampling. I mean, there was another plant here, not just this aroclor plant, but there was a parathion plant that we were greatly concerned because we knew that it was poisonous

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material and there was a lot of work done there. I did a lot of air sampling for SO2, and of course, dealt with the regulators, dealt with local people who operated the wastewater treatment plant because we had to interface with them because our wastewater treatment plant emptied into theirs. We did a lot of work with those people and the city management.

Q Were you ever involved with the work to reduce the release of PCB's of the Monsanto Plant in Anniston?

A Yes.

Q What kind of work was that?

A Well, it was planning work, you know, you observed things, you see things from the analysis that are occurring or you think that they are occurring and just take the ones that are occurring in the direction you want it to, which was to get the PCB levels down in the affluent. And you tried to design something that allows you to get there, and we put in knock outages. You were mentioning with air pollution awhile ago, we put in knock outages for two things, one, to get the entrained aroclor out of the buratic acid so we wouldn't have to waste as much of it. We pulled in coil lessing units for that.

We built sumps around various places that we knew we had chances for line breakage or leakage out of pump packing or valve leaks and directed that material to these

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sumps and pumped those sumps out and all of that had to be looked after, watch it, get somebody to come in and pump the sumps out. It was more than an eight hour a day job. Plus working with the engineer on the design of the various facilities.

MR. ASHLEY: Could we take a break here.

(Whereupon, a short break was had.)

MR. ASHLEY: All right. Back on the record.

BY MR ASHLEY:

Q Mr. Wright, did you ever -- I'm sorry, strike that.

Were there ever any analytical studies for PCB's conducted on animal samples?

A On animal samples?

MR. PECK: Now, did you include fish?

BY MR. ASHLEY:

Q Animals, fish, aquatic, you know, aerien life?

A Yes.

Q What animals did y'all do studies on?

A Oh, gosh, well, we had a dead hog once.

MR. PECK: When he says animals, he means fish.

THE WITNESS: Well, I'm not an ichthyologist so I can't tell you that big long list of fish. I can tell you there was -- we had some ichthyologists from Tulane in, they

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collected fish, they cataloged them with the scientific names and then they gave us the common names out to the side. And there was considerable work done on that for, I'm not sure how long, but probably, two -- I don't want to speculate on how long, but for some period of time. Well within a year.

Q Where were the fish taken from?

A They were taken from, taken from Choccolocco Creek, upstream from the confluents of Snow and Choccolocco, and they were taken at various points downstream from the confluents of Snow and Choccolocco, and into the Coosa River and also above the -- I believe there was some taken above and below the confluents of Choccolocco with the Coosa.

Q Now, you mentioned a hog, where was the hog taken from?

A The hog was taken from up around the dumpsite and --

Q Are those the only animals that you recall as fish and a single hog?

A Uh-huh.

Q No birds ever tested?

MR. PECK: You're talking about by him or under his --

BY MR. ASHLEY:

Q Right, that you're aware of?

A No, no birds.

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Q What about chickens?

A No, no chickens.

Q Now, just -- I think we have, you have talked about this before, but just so I am clear; you ended your position as Pollution Control Engineer at Monsanto at the same time that they ended the aroclor production at Monsanto.

MR. PECK: Objection.

THE WITNESS: No, sir.

BY MR. ASHLEY:

Q I'm sorry then.

A About six months later, I believe.

Q So six months after they ended production of aroclor at Anniston you left Monsanto permanently?

A Yes.

MR. PECK: By aroclor you mean PCB's?

BY MR. ASHLEY:

Q Right.

A Yeah.

Q When the PCB production at Anniston was ended, did that have any effect on your overall budget as Pollution Control Engineer?

A No.

Q Were you ever denied funding for particularly a PCB related project?

A No. As demonstrated by -- there are a lot of

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documents in there, there is probably stuff in there about us building laboratories and buying instrumentation and actually increasing our workforce to provide the technicians and, you know, giving me some more help on my other job so that we could concentrate on this. No, Monsanto never denied money, not to me.

Q Mr. Wright, I'm going to give you a document labeled Exhibit 2 and it is a document dated January 23rd, 1969, titled aroclors and plant affluent, on the bottom it has a Bates Stamp, I think, Number of NEV 031181.

MR. PECK: I believe this is a -- I mean, let me just object for the record. I think this is a multipage document on which you just have given us the first page, and you can do that, that is fine, I just object for the record. I think there are additional pages.

BY MR. ASHLEY:

Q All right. Do you recall receiving this document -- strike that.

Mr. Wright, do you recognize this document?

A I do.

Q Does it appear to be a Monsanto document?

A It is.

Q Do you recall receiving this document in 1969?

A I did receive this document in 1969 but I don't recall the exact circumstances under which I received it,

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yeah.

Q And do you know who wrote it?

MR. PECK: That's what the missing page is about?

THE WITNESS: Let me read it, okay, and see if I can --

(Brief pause.)

I would imagine this was written by Paul Hodges in St. Louis.

BY MR. ASHLEY:

Q Can you spell has last name?

A P-A-U-L H-O-D-G-E-S.

Q Okay. All right. Mr. Wright, do you recall meeting with a J. L. Crockett at Alabama Water Improvement Commission in May -- on May 6, 1970?

A Yes.

Q And do you recall a J. C. Landwehr and G. W. Miller also present at that meeting?

A Yes.

Q Was there anyone else present at that meeting?

MR. BECK: From Monsanto?

MR. ASHLEY: Anyone.

BY MR. ASHLEY:

Q Do you recall anyone else being present at the meeting?

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A Myself, Gerald Miller, Joe Landwehr and Mr. Crockett.

MR. PECK: He's asking also, I guess, if there is anybody from AWIC or Mr. Crockett's staff?

BY MR. ASHLEY:

Q All right. Do you recall anybody else being in the room?

A I don't recall anyone else being in the room.

Q What was the purpose of that meeting?

A The purpose of the meeting was to bring Mr. Crockett who was the Director of the Alabama Water Improvement Commission up-to-date on the work that we were doing with regard to -- well, it was to give him some background with regard to PCB's and to bring him up-to-date on the work that we were doing there in the plant. It was a voluntary trip to see him. I had been in contact with Mr. Crockett for a couple of years prior to that on the parathions and some other things, and I think I initiated we would like to come down and have a meeting with you and talk to you about something.

Q So it is your recollection that you initiated this meeting?

A I believe I did.

Q It was your idea?

A It wasn't my idea, but I initiated it.

Q Whose idea was it?

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A It was probably Joe's.

Q Joe Landwehr?

A Yeah.

Q Was this the first contact that you ever had with anyone from -- anyone with the Alabama Water Improvement Commission?

A No.

Q What prior contact had you had with that Commission?

A Well, as I mentioned earlier we had a parathion manufacturing process there at the plant at that time and we were dealing with some material that was toxic, we knew that, and we periodically kept Mr. Crockett updated on the work that we were doing in that area to minimize any releases of this material, how our wastewater treatment plant was doing in treating this material. We were actually sampling Choccolocco Creek for that material prior to the aroclor/PCB issue. And so I had been meeting with him for a couple of years now, not monthly but maybe a couple of times a year.

Q But this was the first contact you had had with the Alabama Water Improvement Commission regarding aroclors or PCB's?

A That's correct.

Q So --

A The first one I had had and I would have to

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assume that that was the first one, yes.
Q And had Monsanto – I'm sorry, strike that. Is this the first contact that anyone from Monsanto had with Alabama Water Improvement Commission regarding aroclors and PCB's?
A I can't answer that, I have no knowledge of that.
Q Did you provide any test results concerning PCB's to Mr. Crockett prior to May 1970?
A No.
Q No. Okay.
A I don't believe we did, no.
Q When did you start – when did you start providing the results of your sampling tests to Mr. Crockett at the Alabama Water Improvement Commission?
A I don't recall those dates, it was sometime after that. I am not sure how long after that. It would have been after we were comfortable that we were getting reproducible results.
Q So it was sometime after your May 6, 1970 meeting?
A Yes.
Q Did you give results from all of the tests that you did to Mr. Crockett including your solid soil samples, your liquid samples, your atmospheric and the results from the

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those animal tests; were all of your test results given to Mr. Crockett?
MR. PECK: Object to the form of the question. Go ahead.
THE WITNESS: No, because those animal samples and all came along later. We furnished him with the water column samples from the effluent from the treatment plant, from the neutralization basin.
BY MR. ASHLEY:
Q And were those the only test results that you furnished him?
MR. PECK: Object to the form of the question.
THE WITNESS: Ask me that again.
BY MR. ASHLEY:
Q I'm sorry, I'll rephrase it. Were the only test results given to Mr. Crockett or Alabama Water Improvement Commission those results from the tests of the liquid effluent for PCB's?
A I believe they were, those were the routine tests that were reported to him every month. Now, were some of the other things reported to him, I don't know. But routinely we reported that to him monthly.
Q Only the liquid tests?
A Yeah.
Q Do you recall ever providing Alabama Water

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Improvement Commission any of the soil solid test results?
A I don't recall that.
Q Okay. All right. Mr. Wright, I'm going to give you a copy of a document marked Exhibit 3. Do you recognize this document dated May 7th, 1970, titled arocloric pollution, AWIC Contact, Bates Number DSW0140987
A Uh-huh. Yes.
Q Does this appear to be a Monsanto document to you?
A Yes.
Q Do you remember receiving a copy of the document in 1970?
A I'm sure I did, yes.
Q And, Mr. Wright, I'm going to ask you to take your time and review this document because I'm going to ask you a couple of questions about it, so we can go off the record, it's pretty long, you can take your time and read the whole thing if you like.
A Okay.
(Brief pause.)
Q Mr. Wright, on the first page of the document I gave you there is, I believe, five numbered recommendations where it says his recommendations were as follows, and I believe his is referring to Mr. Crockett. Did, in fact, Monsanto follow all of those five recommendations to your

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knowledge?
A Yes, sir.
Q Okay. On Number 5 it says: If in the future, information is developed indicating that aroclors are detrimental to watersheds -- what is meant by the term watershed there?
A Well, I would say the Snow Creek, Choccolocco Creek watershed.
Q So by the word watershed it just simply means a body of water?
A (Witness nods head affirmatively.)
Q Okay. Do you recall ever suggesting to Mr. Crockett that Monsanto should give no statements or publications which would bring the situation to the public's attention, and I'm reading from recommendation Number 3.
MR. PECK: The question is –
THE WITNESS: Do I recall giving that?
BY MR. ASHLEY:
Q I'm sorry, I'll rephrase that. Was recommendation Number 3, was that your idea or suggestion or recommendation to Mr. Crockett?
A Well, in the context of this letter it appears to be Mr. Crockett's idea, but I think it was probably a mutual agreement between Monsanto and the AWIC. But personally, no, I didn't make that comment.

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Q And did you recall Mr. Landwehr or Mr. Miller making a suggestion to that effect?
A No. No.
Q Okay. Did you ever meet in person with Mr. Crockett again?
A Yes, we went back later, but I don't recall the dates.
Q Was it several more meetings or a dozen or more?
A One more I know before, possibly two.
MR. PECK: That he was involved in?
MR. ASHLEY: Yes.
BY MR. ASHLEY:
Q Do you expect to be called as a witness by Monsanto in this trial?
A Yes.
Q What do you expect to be the nature of your testimony?
MR. PECK: I object to the form of the question, it calls for speculation by him because we get to ask the questions, all he has to do is answer. But if you have thoughts about that, you can give them.
THE WITNESS: I don't know other than, you know, I was one of the people who was there during this period of time. I suppose, that is purely speculation, I would

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suppose I would be asked questions very similar to what we have discussed here this morning.
BY MR. ASHLEY:
Q Did you do anything to prepare for your deposition today?
A I did look at some documents, yes.
Q Which documents did you look at, if you can remember?
MR. PECK: He looked at documents we showed him and give him to look at and went over with him.
You know, you can try to describe that to him if you want, but there were a fair number of them.
MR. ASHLEY: Okay. That's fine. If we could take just one short break and we are probably finished.
MR. PECK: Okay.
(Whereupon, a short break was had.)
MR. ASHLEY: Back on the record.
BY MR. ASHLEY:
Q What contact, if any, did you ever have with any of the residents of Anniston regarding PCB's?
MR. PECK: Did he?
MR. ASHLEY: Right.
THE WITNESS: I didn't have any.
BY MR. ASHLEY:

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Q You never responded to any inquiries, complaints or questions about PCB's from someone in Anniston?
A No.
Q You mentioned you had several superiors, I think, in your time as Pollution Engineer; can you to the best of your recollection go -- give me the time periods that -- I believe Mr. Taffee, was he your first superior?
A Yes, sir, Mr. Taffee, he was first.
Q About what years was he your superior?
A If you find out when Gene Coley was killed, two weeks later.
Q He began or ended?
A He began.
Q So as soon as he began -- as soon as you began Pollution Control Engineer?
A Yes, uh-huh.
Q Then was your next superior Mr. Landwehr?
A Joe was actually Mr. Taffee's superior.
Q I see. What about Mr. Miller, Gerald Miller?
A I'm not sure that I ever reported directly to Gerald, I worked with Gerald in setting up the laboratories and stuff. I'm not sure that they transferred my function over to Gerald when he became the chief chemist. They didn't -- I believe they didn't transfer it over until Toby Bell became the chief chemist.

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Q About what years was Mr. Miller chief chemist?
A You would have to ask Mr. Miller.
Q Okay. Do you recall generally what his responsibilities were as chief chemist?
A Well, as the chief chemist he's the manager of the laboratories and the R&D efforts, research and development efforts, and any special studies that, you know, might be directed from the technical services department or support of those kinds of things.
Q I'm sorry, repeat; special studies from what department?
A The operating departments, the manufacturing departments.
Q So are you saying that he was the head of R&D in Anniston, of research and development?
A Uh-huh.
Q Okay. And do you recall him holding any other positions other than chief chemist at Monsanto?
A He was also the department supervisor in the aroclor department.
MR. PECK: While he was chief chemist?
THE WITNESS: After. I believe it was after.
BY MR. ASHLEY:
Q What were his responsibilities in that position?

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A He would be responsible for the overall production in management of that particular manufacturing operation.
Q And that was after he was chief chemist?
A Yes.
MR. PECK: Off the record.
(Whereupon, an off-the-record discussion was had.)
MR. ASHLEY: Back on the record.
That's all I have.
MR. PECK: All right. I don't have anything.
FURTHER THIS DEPONENT SAITH NOT.
(Signature waived.)

REPORTER'S CERTIFICATE

STATE OF TENNESSEE
COUNTY OF HAMILTON

I, Rebekah Archer, Notary Public and Certified Court Reporter, do hereby certify that I reported in machine shorthand the deposition of EUGENE WRIGHT, called as a witness at the instance of the plaintiffs in the above-styled cause; that the said witness was duly sworn by me; that the foregoing pages, numbered from 1 to 55, inclusive, were typed under my personal supervision and constitutes a true and correct record of the deposition by said witness.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

Witness my hand in the City of Chattanooga, County of Hamilton, State of Tennessee, this 27th day of January, 1999.

Rebekah Archer, RPR, Notary Public
and Certified Court Reporter
Certificate No. A-1311

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