

1 Q. Do you have any recollection of your
2 visit to the Diamond Alkali plant?

3 A. I remember going there. I remember seeing some
4 cases. I remember going to the hospital with Dr.
5 Bleiberg to see a patient that was in the hospital.

6 Q. How did it come to be that you were
7 visiting this particular plant?

8 A. Well, I'm not sure whether Dr. Bleiberg called
9 and said he had these interesting cases and then we
10 said, well, we would have to come by virtue of being
11 invited by the state which was usually the protocol.
12 The Public Health Service simply didn't go barging
13 into places without having proper entry. It would
14 have been through the State Health Department.

15 Q. Were you ever invited by the particular
16 enterprise itself?

17 A. By Diamond Alkali?

18 Q. Yes.

19 A. No.

20 Q. Were you ever invited by any corporate
21 entity to visit their plant?

22 MR. RUSSO: In relation to what, sir?
23 I'm going to object to the form.

24 A. Yes. I was invited by the railroads, I think
25 the Southern Railroad and the MKET to look at some

1 coal miners and I had some personal input to that
2 activity. Of course, we had a toxicological group
3 headed by Dr. Herb Stockinger, investigated any
4 cases of chemical poisoning that appeared. May I
5 break off to explain that the facility responded
6 only to requests from the appropriate department in
7 the state. It did not respond to any private
8 requests from industry or anybody else. The request
9 had to come from the state.

10 Q. Was the procedure at that time, if you
11 know, for the industry to go to the State Departmen
12 and then the State Department to seek help from the
13 Federal Public Health Department?

14 A. If industry wanted something done, they would
15 have to do it that way.

16 Q. Then am I correct in understanding your
17 testimony that industry could not come to the
18 Federal Department of Public Health Service directly
19 and ask for your assistance?

20 A. Except in an emergency, no.

21 Q. Thank you.

22 A. Well, going back then to we had a fairly large
23 number of industrial hygienists and engineers whose
24 job was to go out and take samples, devise
25 protective order measures, advise the various state