

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF INDIANA
3 INDIANAPOLIS DIVISION

3 THE CITY OF BLOOMINGTON, INDIANA;)
4 THE UTILITIES SERVICE BOARD OF)
5 BLOOMINGTON, INDIANA; and MONROE)
6 COUNTY, INDIANA,)

7 Plaintiffs,)

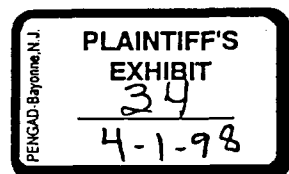
8 vs.)

9 Civ No.
10 IP 33-9-C

11 WESTINGHOUSE ELECTRIC CORPORATION,))
12 a Pennsylvania corporation; and)
13 MONSANTO COMPANY, a Delaware)
14 corporation,)

15 -----Defendants.-----)

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



Longoria & Goldstine 236 1030 Chicago

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

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

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

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

23 A. Yes. ?

24 Q. And because you were paying for that,

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

5 A. That was an objective.

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

9 A. That's right.

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

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

15 Q. Okay.

16 A. And he did touch on that.

17 Q. Did he touch on --

18 A. Yes.

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

21 A. Yes.

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

1 A. All right. Yes.

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

4 A. Yes.

5 Q. Is it in operation now?

6 A. No.

7 Q. Why not?

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

10 Q. Not enough customer base?

11 A. Correct.

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

14 A. We demonstrated it. Yes.

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

19 A. Yes.

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

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