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Transcript of Michael Santoro
Conducted on September 15, 2017

10 (37 to 40)

37 1 baseline operating temperatures are 1100 F, 590 C in the 2 primary chamber and 1600 degrees Fahrenheit and 870 3 degrees Centigrade in the secondary chamber?" 4 A. Yes. 5 Q. Is that accurate? 6 A. It was accurate at this time, yes. 7 Q. And so that was accurate at least back in 1978? 8 A. Correct. 9 Q. Now, when there was a decision made by the 10 company to begin incinerating the HF tars, did you 11 consult with anyone in making that decision or was it 12 your decision? 13 A. I don't recall whether we talked to people in 14 the environmental group. I really don't remember back -- 15 back then. 16 Q. In terms of relative volume of what was being 17 burned in the incinerator, how much did HF tars take up? 18 MR. SMITH: Objection to form. 19 A. I would say a relatively minor portion of what 20 was incinerated. 21 BY MR. HERMAN: 22 Q. And once the HF tars were incinerated, was there 23 an additional waste byproduct of some sort? 24 A. After incineration, what would have been left 25 would have been a burned-out carcass of the drums; so it	39 1 Q. What were your job duties as the superintendent? 2 A. The -- as I said, the -- I was responsible to 3 oversee operations of the incinerator, the waste water 4 treatment plant, the water supply system at the site, as 5 well as the boiler, boiler operations, and the yard crew 6 that took care of the facility there. 7 Q. The Chemolite facility was located where, sir? 8 A. It's located in Cottage Grove, Minnesota. 9 Q. And is that a campus? 10 A. One could call it that, yes. 11 Q. And apart from the Chemolite facility, what 12 other facilities at that time, that is, in the mid to 13 late '70s, were located on the campus? 14 A. Well, the site itself was called Chemolite. It 15 housed a number of operating divisions. The name 16 Chemolite comes from chemical division and the Scotchlite 17 division, so it's a combination of those two names to 18 form the term "Chemolite." 19 But it's a one -- the Chemolite site is one 20 site with a number of other manufacturing facilities, 21 number of other divisions? 22 Q. And your responsibilities as the superintendent 23 encompassed all the different facilities in the 24 Chemolite -- 25 A. Only as it related to steam production from the
38 1 would have been just metal waste. 2 Q. Was there ash? 3 A. Oh, ash. The ash would be in there, yes. 4 Q. What happened to the ash? 5 A. It was disposed of, and I don't -- for the most 6 part landfilled. 7 Q. Where was it landfilled? 8 A. I don't recall that. 9 Q. Did you ever think it was important to test the 10 composition of the ash? 11 A. I don't recall if we did or not. 12 Q. What did you do with the -- with the drum 13 carcasses, the barrel carcasses? 14 A. They would have been handled as ash. It would 15 have been all combined. 16 Q. And rebarreled, is that what happened? 17 MR. SMITH: Object to form. 18 A. Stored -- or collected somehow for shipment. 19 BY MR. HERMAN: 20 Q. And you don't recall where they were shipped to? 21 A. I do not. 22 Q. Let's go back to your employment history. 23 You say you were the superintendent from 24 1976 to roughly 1979? 25 A. That's correct.	40 1 boiler house or water supply in the wells, handling of 2 waste materials, waste water, for example, but not the 3 manufacturing site, not the manufacturing portions of 4 those sites. 5 Q. To whom did you report? 6 A. I started -- when I went down to the facility, 7 as I said, Dale -- Mr. Dale Pepple. 8 Q. Oh, you did say that. I apologize. 9 A. And then other -- when he left, then it was -- 10 oh, that brings back memories. Chuck Weber and Tom 11 Mercein, a number of people. 12 Q. Now, you said you were in charge of the water 13 supply. 14 Did that include potable water, drinking 15 water? 16 MR. SMITH: Object to form. 17 A. That use -- water was used -- it was a 18 self-contained site, so we pumped water from wells - used 19 for drinking, but also used for cooking. There's a 20 couple of cafeterias as well as most use was in 21 manufacturing process. 22 BY MR. HERMAN: 23 Q. Do you recall that waste water was deposited 24 directly into the Mississippi River from the Chemolite 25 facility?

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11 (41 to 44)

41 1 MR. SMITH: Object to form. 2 A. It was deposited -- there was treatment prior 3 to dispo -- prior to disposal into the river. 4 BY MR. HERMAN: 5 Q. And what did the treatment consist of? 6 A. Oh, early on it was basically sediment -- 7 settling to remove the suspended solids. And as I said, 8 the installation of a biological treatment system 9 activated sludge to treat the organic material. And 10 so -- and then since that time there was further 11 treatment of incinerator waste water. That required 12 removal of particle matter. So there was a number of 13 treatment facilities at the site. 14 Q. Did there come a time when the waste water from 15 perfluorochemical manufacturing and processing was 16 treated differently? 17 MR. SMITH: Objection to form. 18 A. No. 19 BY MR. HERMAN: 20 Q. Do you recall the volume in gallons of waste 21 water that was deposited directly into the Mississippi 22 river? 23 MR. SMITH: Objection to form. 24 A. I don't recall. 25 Q. Was it over 70,000 gallons a year?	43 1 Q. And by "that chemistry," you mean the 2 perfluorinated chemical chemistry? 3 A. Yes. 4 Q. And the barrels of HF tar, were they -- were 5 they the waste material produced in building 15 from the 6 PFC production? 7 MR. SMITH: Object to form. 8 A. Yes. 9 BY MR. HERMAN: 10 Q. Apart from HF tars, what other waste material 11 was associated with the production of PFCs? 12 A. Well, in the production process, there would be 13 scrubbing systems to scrub particles out of the air 14 discharge, and that water would have also gone down to 15 the waste treatment facility. 16 So any time there was a waste water 17 generated through the production process, that would have 18 been disposed of in that existing waste water system. 19 Q. And that was the waste water system you've 20 described? 21 A. Correct. 22 Q. There were no special processing steps taken 23 because the waste came from PFC production? 24 A. No. 25 Q. Do you recall learning that there were barrels
42 1 Does that ring a bell? 2 MR. SMITH: Objection to form. 3 A. Oh, yes. Yes. 4 BY MR. HERMAN: 5 Q. More than 100,000 gallons a year? 6 MR. SMITH: Object to the form. 7 A. Yes. 8 BY MR. HERMAN: 9 Q. What would you estimate the volume to be in 10 terms of gallons per year? 11 MR. SMITH: Objection to form. 12 A. It would be -- I remember the one treatment 13 facility treated 300 gallons a minute. So it's a fairly 14 substantial flow of -- of treated waste water. 15 BY MR. HERMAN: 16 Q. Was there a -- did the buildings at the 17 Chemolite facility have numbers associated with them? 18 A. Yes. 19 Q. And do you recall building 15? 20 A. Yes. 21 Q. What was building 15? 22 A. It was the electrofluorination process. 23 Q. And what was -- what was produced as a result of 24 that process in building 15? 25 A. A number of products made with that chemistry.	44 1 of HF tars in the Woodbury disposal site? 2 A. I was not aware -- 3 MR. SMITH: Object to form. 4 A. -- of that. 5 BY MR. HERMAN: 6 Q. Do you recall that there were HF tars disposed 7 of in the Oakdale disposal site? 8 MR. SMITH: Object to form. 9 A. No, I'm not aware of that. 10 BY MR. HERMAN: 11 Q. Are you aware that HF tars were disposed of in 12 the Washington County landfill? 13 MR. SMITH: Object to form. 14 A. I'm not aware of that. 15 BY MR. HERMAN: 16 Q. Are you aware, sir, that the groundwater flowing 17 from and underneath the Woodbury disposal site had PFCs? 18 MR. SMITH: Object to form. 19 A. I don't recall now what -- what the analysis 20 showed of that. 21 BY MR. HERMAN: 22 Q. When was this analysis done? 23 A. I don't remember, but -- I don't remember that 24 finding. 25 Q. Do you recall that there was a finding that

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12 (45 to 48)

45 1 there were PFC wastes in the groundwater near the 2 Washington County landfill? 3 MR. SMITH: Objection to form. 4 A. Yes. 5 BY MR. HERMAN: 6 Q. And 3M had dumped waste at the Washington County 7 landfill, right? 8 MR. SMITH: Objection to form. 9 A. I don't recall what was disposed of there from 10 3M. 11 BY MR. HERMAN: 12 Q. Well, 3M disposed of something there, right? 13 A. Yes. 14 Q. Some waste product, right? 15 A. Yes. 16 Q. And it was a fairly large volume of waste 17 material that 3M deposited, right? 18 MR. SMITH: Object to form. 19 A. I don't know -- I don't know -- I don't -- I 20 don't recall that. 21 BY MR. HERMAN: 22 Q. You don't recall one way or the other? 23 A. Correct. 24 Q. Do you recall that waste material from Building 25 15 was deposited in the Oakdale site?	47 1 expressed about PFC waste? 2 MR. SMITH: Objection, form. 3 A. I -- I don't recall. 4 BY MR. HERMAN: 5 Q. You recall concerns being expressed about PFC 6 waste material, right, at that time? 7 MR. SMITH: Object to the form of the 8 question. 9 A. I do recall being concerned about solvent types 10 of wastes which are disposed -- which is the main 11 category of waste disposed of at Oakdale. 12 BY MR. HERMAN: 13 Q. I was asking you, though, about PFC waste, sir. 14 A. Yeah, I understand. 15 But what I remember was more about solvent 16 contaminant of waste. 17 Q. Putting aside Oakdale, do you recall that by 18 1980 there had been concerns expressed about the 19 possibility of PFC contamination in groundwater? 20 MR. SMITH: Objection to form. 21 A. I don't recall. 22 BY MR. HERMAN: 23 Q. When do you first recall concerns being 24 expressed about PFC contamination in groundwater? 25 A. Where?
46 1 MR. SMITH: Object to form. 2 A. I'm not aware of that. 3 BY MR. HERMAN: 4 Q. Not aware one way or the other? 5 A. I don't recall if I knew it, and -- I don't 6 recall. 7 Q. You recall that there was PFC found in the 8 groundwater in connection with the Oakdale disposal site? 9 MR. SMITH: Objection to form. 10 A. Yes. 11 BY MR. HERMAN: 12 Q. And you recall that 3M had disposed of waste at 13 the Oakdale site, right? 14 A. That's correct. 15 Q. Do you recall the time period during which 3M 16 disposed of waste at that site? 17 A. As I recall, it was in the early 1950s. 18 Q. How did you learn that? 19 MR. SMITH: Objection to form. 20 A. I don't remember the sequence of how that 21 came -- that information came about. 22 BY MR. HERMAN: 23 Q. Do you recall when you learned it, roughly? 24 A. It was in the late '70s, early '80s. 25 Q. What concerns at that time do you recall being	48 1 Q. Anywhere. 2 A. Boy, I don't recall when we first made that 3 finding. 4 Q. Do you recall what decade it was? 5 A. No. 6 Q. You don't recall learning about it in the 1970s? 7 MR. SMITH: Objection to form. 8 A. No. 9 BY MR. HERMAN: 10 Q. Do you recall first learning about it in the 11 1980s? 12 MR. SMITH: Objection to form. 13 A. I don't recall -- again, I don't recall when 14 this finding came about. 15 BY MR. HERMAN: 16 Q. Well, sitting here today, what is the first time 17 you can recall learning that there was PFC contamination 18 in groundwater in the east metro area? 19 A. I don't remember specifically -- 20 Q. Do you remember -- 21 A. -- and even generally. I just don't. 22 Q. You have no memory as to even the decade which 23 you first -- 24 A. No. 25 MR. SMITH: Objection to form.