

U.S. DISTRICT COURT DEPOSITION
CASE NO. 89-30201-F

Alice L. Warren, Administratrix of
the Estate of John H. Warren, Deceased

Vs.

The Dow Chemical Company, et al.

Monsanto Company Response

Schedule A, Item 2. The purchase of vinyl chloride for use at Monsanto's facility in Springfield, Massachusetts ("the Springfield facility") between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:

a. the dates of all purchases of vinyl chloride;

Response: Monsanto record retention policy requires purchasing and accounting files to be destroyed after a time period which this interrogatory exceeds.

b. the names and addresses of all manufacturers or distributors from whom vinyl chloride was purchased;

Response: Monsanto record retention policy has required the destruction of such documents.

To the best of Monsanto's present knowledge and information, the Monsanto Springfield Plant purchased vinyl chloride (VC) monomer from Dow Chemical Company, Plaquemine, Louisiana, from B.F. Goodrich, Calvert City, Kentucky, and possibly from Connoco and Union Carbide, addresses unknown, per various "exchange" agreements. The Springfield Plant was also supplied with VC monomer internally from Monsanto's Texas City Plant, Texas City, Texas.

- c. a description of all documents of whatever kind maintained at any time by Monsanto to memorialize any purchase of vinyl chloride;

Response: Monsanto record retention policy has required the destruction of such documents.

- d. the names and current or last known addresses of all Monsanto employees whose duties included the purchase of, or supervision of the purchase of, vinyl chloride for use at the Springfield facility;

Response: Mr. Charles Smith (retired)
80 Colton Rd., Box 125
Somers, CT 06071

Mr. Lawrence Gormally (retired)
122 Newton Road
Springfield, MA 01118

Mr. Robert Bourget (active)
24 Bittersweet Lane
Wilbraham,, MA 01095

Schedule A, Item 3.

The delivery of vinyl chloride to and storage of vinyl chloride at the Springfield facility between January 1, 1947 and January 1, 1983, including but not limited to:

- a. all documents of whatever kind maintained at any time by Monsanto to memorialize the delivery of vinyl chloride to or the storage of vinyl chloride at the Springfield facility;

Response: see attachment

- b. all containers or devices used to store or transport vinyl chloride within the Springfield facility;

Response: see attachment

- c. the names, job titles and current or last known addresses of all Monsanto employees whose duties included receiving or storing vinyl chloride at the Springfield facility;

Response: Mr. Joseph Tierney, T&M Supervisor (retired)
32 Sunapee Street
Springfield, MA 01108

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Schedule A, Item 4: The manufacture or production by Monsanto or by any corporation or business entity owned by, controlled by or affiliated with Monsanto of vinyl chloride between January 1, 1947 and January 1, 1983, inclusive;

Response: As noted earlier, VC monomer was produced at the Monsanto Texas City Plant but there are no records on file at this location in this regard. VC monomer was never produced at the Springfield facility.

Schedule A, Item 5: The corporate structure of Monsanto between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:

a. all corporations or business entities owned by, controlled by or affiliated with Monsanto through common ownership or control or otherwise, and the functions served or products produced by any such corporations or business entities;

Response: We have not been able to locate any records on file in this regard.

b. the ownership and control of the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;

Response: To the best of our knowledge, Monsanto owned the Springfield facility during the period in question.

c. the production and sale of vinyl chloride.

Response: As noted earlier, VC monomer was never produced at the Springfield facility. Although it was produced at the Texas City facility, we have no records on file at this location in this regard.

Schedule B, Item C. all invoices, receipts, ledgers or other records (whether physically or electronically recorded) memorializing the purchase, delivery, storage or utilization of vinyl chloride utilized at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;

Response: All invoices, receipts, ledgers memorializing the purchase and delivery of VC monomer at the Springfield facility have been destroyed in accordance with record retention procedures. All other records as to purchase, delivery and storage of VC monomer were included as attachment to Schedule A. With regard to VC monomer utilization, the only records that have been located in the plant relate to polyvinyl chloride production procedures and product modification approvals without regard to product formulations or use. These records can be reproduced upon request.

Schedule B, Item D.

any and all charts or diagrams or documents of whatever description memorializing or depicting the corporate structure of Monsanto between January 1, 1947 and January 1, 1983, inclusive;

Response: We have not been able to locate any records at the Springfield facility in this regard.