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Attorneys for Plaintiff  
NEVADA POWER COMPANY  
a Nevada corporation

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

|                                 |   |                                        |
|---------------------------------|---|----------------------------------------|
| NEVADA POWER COMPANY, etc.,     | ) | CASE CV-S-89-555-LDG (LRL)             |
|                                 | ) |                                        |
| Plaintiff,                      | ) | PLAINTIFF NEVADA POWER                 |
|                                 | ) | COMPANY'S MAY 28, 1993                 |
| vs.                             | ) | ANSWERS TO DEFENDANTS'                 |
|                                 | ) | SEPTEMBER 14, 1992                     |
| MONSANTO COMPANY, etc., et al., | ) | CONTENTION <del>INTER</del> ROGATORIES |
|                                 | ) |                                        |
| Defendants.                     | ) |                                        |
|                                 | ) |                                        |

As required by the Court's scheduling order, plaintiff Nevada Power Company ("Nevada Power") responds to defendants' September 14, 1992 contention interrogatories. Nevada Power reserves the right to supplement these responses after court-established deadlines for other disclosures, such as the substance of fact and

...

expert witness anticipated testimonies, and after it has completed discovery in this matter.

INTERROGATORY NO. 6:

For each defendant, separate[ly] state and identify each fact, document, and witness in support of your claim for failure to warn.

ANSWER TO INTERROGATORY NO. 6:

1. In addition to the contentions below, Nevada Power incorporates by reference the contentions in its Complaint, or as later amended pursuant to stipulation or Court approval. Defendant Monsanto manufactured dielectric fluids containing polychlorinated biphenyls ("PCBs"), and sold them as commodity chemicals to defendants Westinghouse and General Electric, as well as to other companies, all of whom used the Monsanto dielectric fluids in transformers and capacitors sold to plaintiff (hereafter "PCB electrical products"). Monsanto was, at all relevant times, the sole U.S. supplier of dielectric fluids containing PCBs to the U.S. electrical utility industry, engaging in direct sales to companies such as Nevada Power, and indirect sales through equipment suppliers such as defendants G.E. and Westinghouse, who placed the fluids in electrical equipment sold to Nevada Power and who also sold Nevada Power replacement fluids under their own trade names. Monsanto was the ultimate source of all dielectric fluids containing PCBs acquired by Nevada Power. (The specific transformers and capacitors, their dates of purchase, and the resulting damages proximately caused to Nevada Power's system of generating and distributing electricity, as measured by the cost of

repair or replacement, have been identified in prior interrogatory responses, responses to requests for production, and in deposition testimony of Nevada Power officials and exhibits thereto. Rather than needlessly re-explore those topics, with which defendants are intimately familiar, Nevada Power incorporates by reference its prior discovery and deposition responses.)

2. The PCB electrical products purchased by Nevada Power from General Electric, Westinghouse, and other electrical equipment manufacturers were all unreasonably dangerous in one or more respects, including but not limited to the extreme environmental hazard, persistence, and human and animal toxicity and bioaccumulative properties of PCBs and other associated chemicals known as polychlorinated dibenzo-p-dioxins ("PCDDs") and polychlorinated dibenzofurans ("PCDFs"), which are: (i) present as contaminants in PCB electrical products; and [ii] unavoidably formed in hazardous quantities when dielectric fluids containing PCBs and other ingredients deliberately added by Monsanto such as chlorobenzenes are heated, as occurs in fires.

3. PCBs, PCDDs, and PCDFs, because of their persistence, bioaccumulative properties, and toxicity, have accumulated generally in the environment and in human and animal tissues to the point where they have created a cumulative hazard to humans and their environment. Each defendant has contributed to that cumulative hazard to a significant degree, both through their respective parts in the manufacture and sale of PCB electrical products and through their manufacture and sale of other products

containing PCBs, PCDDs, and PCDFs, all of which have resulted in the discharge of those substances to the environment, creating a cumulative hazard to human health and the environment when combined with the environmental releases of other manufacturers' products containing PCBs, PCDDs, and PCDFs.

4. The cumulative hazard substantially contributed to by each defendant created a situation in which any further release to the environment of PCBs, PCDDs, and PCDFs exacerbates the hazard to humans and their environment and renders defective all transformers and capacitors on Nevada Power's system containing any level of PCBs, because of the infeasibility of preventing transformer and capacitor failure resulting in PCB, PCDD, and PCDF discharges to the environment. Nevada Power's damages, the cost of repairing or replacing all equipment in its system containing any detectable level of PCBs, are thus the proximate result of a cumulative, indivisible wrong committed by all defendants and by others not party to this suit, for which each defendant is jointly and severally liable.

5. At no time prior to purchase and sale of the products at issue did any defendant give Nevada Power or any other member of the American electrical utility industry a warning that was timely, reasonable, or adequate to cause a reasonable person to exercise the level of care and caution necessary to avoid the harm that befell Nevada Power commensurate with the dangers thereof. Had any defendant done so, Nevada Power could have avoided the damages inflicted upon it by a variety of means, including: [i] designing

its system differently so that transformers and capacitors containing or resulting in the formation of PCBs, PCDDs, or PCDFs were unnecessary; [ii] purchasing alternative equipment that either was or would have been available which did not contain or result in a cumulative PCB, PCDD, and/or PCDF hazard; [iii] designing its system in such a manner that any spills or leaks of dielectric fluids creating a PCB, PCDD, or PCDF hazard were avoided or contained; and [iv] to the extent that Nevada Power may have itself exacerbated the problem by adding PCBs to electrical equipment not already containing PCB dielectric fluids, not doing so.

6. At the time of purchase and sale of each item of equipment at issue, each defendant owed Nevada Power Company a non-delegable duty to communicate adequately the dangers that might result from its use or foreseeable use, and to warn of all dangers resulting from use of the product that defendants had reason to anticipate. Each defendant breached that duty, proximately causing Nevada Power's damages, for which they are strictly liable, and for which they are liable in negligence. Moreover, because Monsanto, as a manufacturer, was at least negligent in its breach of its duty to warn, defendants G.E. and Westinghouse are strictly liable as revendors. That defendants owed Nevada Power a duty to warn is established by the facts that: [i] Nevada Power was a foreseeable victim of a lack of adequate warnings; [ii] a series of defendants' own documents, predating purchase and sale, discussed their potential liability and need for warnings; [iii] defendants' entry into indemnification agreements that anticipated this lawsuit; and

[iv] defendants' documents and testimony of their present and former officials, all attesting to defendants' knowledge of particular product hazards to humans and the environment, and the likelihood of government regulation of the products at issue, prior to the time of purchase and sale.

7. That defendants breached their duty to adequately warn is established by facts that, prior to the time of purchase and sale: [i] each defendant knew that dielectric fluids containing PCBs were far more hazardous than was communicated to Nevada Power; [ii] each defendant had adopted hygienic policies and procedures far more stringent than Nevada Power was advised were necessary, based on defendants' belief that PCBs were far more hazardous than was communicated to Nevada Power; [iii] each defendant knew that government regulation of dielectric fluids containing PCBs was likely but did not warn of that risk; [iv] none of defendant G.E.'s and Westinghouse's sales persons who called upon Nevada Power were ever advised by their employers that PCBs were hazardous; [v] none of defendants ever communicated to Nevada Power the fact that their PCB dielectric fluids contained or would form PCDDs and PCDFs; [vi] defendants Westinghouse and G.E. solicited and Monsanto provided information intended to help protect Westinghouse and G.E. workers from poisoning but that information was never adequately communicated to Nevada Power; and [vii] Monsanto communicated the need for certain customer warnings to Westinghouse and G.E., but neither Monsanto itself nor G.E. nor Westinghouse adequately communicated such warnings to Nevada Power.

8. Dielectric fluids containing PCBs are unreasonably hazardous and defective at any detectable level of PCB concentration because of their cumulative hazard as discussed above, because of the potential liability for utilities using or disposing of them, because they are normally mixed with petroleum hydrocarbons requiring total cleanup if accidentally released to the environment, because wastes containing any level of PCBs are not accepted by disposal facilities other than hazardous waste facilities at unreasonable expense, and because it is more likely than not that regulatory agencies will in the near future require removal to present limits of detection.

9. Because, as is discussed in response to interrogatory seven below, defendants' acts complained of rise to the level of fraud, or were malicious, in conscious disregard for the interests of Nevada Power and others similarly situated, defendants should be taxed with punitive damages.

10. While defendants' interrogatory did not call for such detail, Nevada Power anticipates that the more specific facts stated in Appendix A hereto will be presented at trial.

11. Documents supporting the contentions above are described in Appendix B. In addition, Nevada Power gives notice of its intent to rely upon any or all exhibits to depositions not listed in Appendix B, as well as other documents not yet received from defendants in response to discovery requests. Furthermore, Nevada Power anticipates that the significance of some documents already

received from defendants will not become apparent until further discovery is conducted.

12. Nevada Power has not yet determined who its trial fact witnesses will be. Those persons tentatively identified as such include the persons listed below. (Nevada Power anticipates that the list will be narrowed considerably by the date set by the Court for disclosure of fact witnesses and a summary of their anticipated testimonies.)

John Aldworth

Robert Anderson

Jeffrey Bair

Roger Barna

Ed Bates

Floyd Bean

Melvin Belcher

Paul Benignus

D. Berg

C.W. Bickerstaff

J.B. Brittain

Wayne Conaway

John Craddock

Gary Cunningham

E.C. Curtis

Joseph Dietrick

Robert Dyer

William Fessler

Les Fickel  
Yo Fukunago  
James Gabelsburg  
G.C. Gainer  
Frank Gaines  
Jack Garrett  
Fred Garrison  
Lou Grove  
Stephen Hamilton  
Robert Innes  
Sue Jacobson  
Dave Keiser  
Emmet Kelly  
Keith Kelly  
Robert Kimball  
Renate Kimbrough  
Robert Kinslow  
Art Koenig  
George Levinskas  
Richard Mahoney  
Joseph Maiuri  
Lyon Mandelcorn  
Matthew Marston  
James Martendell  
James McCarthy

R.D. McClain  
J. McNichols  
Dr. James Mieure  
Gene Miller  
John Morykon  
Tom Munson  
Charles Murray  
Manny Neal  
James Nelson  
Emmet O'Gara  
Richard Pace  
William Papageorge  
Cumming Paton  
Henry Pearce  
Manuel Reyna  
Ken Robinson  
Dr. George Roush  
Al M. Salazar  
Donald Sauter  
Robert Sawyer  
Raymond Suskind  
Scott Tucker  
Booth Turner  
Ed Walsh  
Coleman Weber

Elizabeth Whalen

Jan Williams

Roger Wills

David Wood

James Wright

Arnold Ypparila

General Electric Company 30 (b)(6) re destruction of documents

" trade associations

" hazards

Monsanto Company 30 (b)(6) re hazards

" IBT

" librarian (re acquisitions)

" PCB fluids to vendees

" trade associations

" vendors & marketshare

. . . .

Westinghouse Electric Corporation 30 (b)(6) re hazards

" 09/23/92 interrogatory

" destruction of documents

" Liberty Mutual

" librarian

" trade associations

All persons whose depositions defendants have taken or will  
take in this litigation

INTERROGATORY NO. 7:

For each defendant, separately state and identify each fact, document, and witness in support of your claim for fraud.

ANSWER TO INTERROGATORY NO. 7:

1. Nevada Power incorporates by reference paragraphs 1, 2, 3, 4, 5, 6, 7, 8, and 10 stated in response to Interrogatory Number six above, excepting the legal conclusions contained therein. Such of those contentions regarding defendants' failure to warn of dangers they should have reasonably anticipated are restated to show that defendants suppressed or concealed information that would have, if it had been revealed, allowed Nevada Power to avoid its resulting proximately caused damages.

2. Prior to the time of purchase and sale, each defendant knew that PCBs were highly toxic to humans and adopted stringent industrial hygienic procedures and policies to protect their own workers from harmful exposure to dielectric fluids containing PCBs. Despite their prior knowledge of demonstrated PCB human health effects such as chloracne, liver toxicity, serious systemic injury, and lethality, each defendant deliberately misrepresented medical facts to the utility industry through its trade associations and to government agencies and Westinghouse and G.E. represented to Nevada Power, that PCBs had a long history of safe use, that they caused only minor reversible skin irritations, and that they were non-toxic to humans. Defendants also stressed to the utility industry through its trade associations, through advertisements, through instruction manuals; to government agencies; and defendants

Westinghouse and G.E. represented to Nevada Power that dielectric fluids containing PCBs were indispensable ingredients for preventing electrical fires. Moreover, defendants Westinghouse and General Electric conspired with each other and with other manufacturers of transformers and capacitors to fix prices and rig bids for the sale of such equipment to utilities such as and including Nevada Power. The goal of defendants Westinghouse and G.E. engaging in this price-fixing conspiracy was to create an artificially high and stable market for transformers and capacitors, thereby stifling and restraining innovation and competition in that type of equipment, and to avoid the capital costs of research and development on alternative or lower-priced equipment. Both G.E. and Westinghouse, and several of their policy-level managers, received criminal convictions for engaging in this conspiracy.

3. The truth, known to defendants at all relevant times prior to purchase and sale of equipment containing PCB dielectric fluids to Nevada Power, commencing in the 1930s and with guilty knowledge constantly expanding thereafter, is that those fluids have a wide range of toxic effects, are so hazardous that the services of an industrial hygienist and rigorous worker hygienic practices are required to avoid hazardous employee exposure, that alternatives to their use were available, and that more alternatives would quickly be developed if utility customers were

to learn their true hazards, thereby creating market demand for them.

4. In order to prevent utility customers from learning of the true hazards of dielectric fluids containing PCBs and upsetting their intentionally dishonest and unfairly lucrative pricing arrangements, Westinghouse and G.E. intentionally concealed the true hazards of dielectric fluids containing PCBs from its own salesmen who called on Nevada Power and other electrical utilities, and crafted sales literature and instruction manuals portraying to their utility customers including Nevada Power that dielectric fluids containing PCBs were innocuous mixtures causing only mild and transitory health effects with massive oral doses required to create serious injury.

5. Westinghouse and G.E.'s withholding of information about the actual hazards of PCB toxicity from its own sales engineers occurred with knowledge that its sales engineers frequently went to work for utility companies such as Nevada Power Company after leaving the defendants' employ, and that their ignorance of those hazards would inevitably be reflected in orders for equipment containing the hazardous PCB dielectric fluids. This was the case at Nevada Power, where a former Westinghouse engineer was hired to design major portions of Nevada Power's electrical system that included equipment containing PCB dielectric fluid.

6. Together with Monsanto, Westinghouse and G.E. also engaged in a campaign of deceit to suppress and deliberately

downplay throughout the electrical utility industry the hazards of PCB dielectric fluid. The goal of this effort was to induce the industry, including Nevada Power, to rely upon the intentional misrepresentations and to purchase dielectric fluids containing PCBs.

7. Defendants G.E. and Westinghouse knew that mineral oil transformers they sold to Nevada Power Company were contaminated with PCBs, yet they intentionally misrepresented to Nevada Power Company that the transformers contained only mineral oil. These misrepresentations were intended to persuade Nevada Power Company to purchase defectively hazardous equipment, and Nevada Power's reliance on those misrepresentations were the proximate cause of a portion of Nevada Power's damages.

8. By the mid- to late 1960's, each defendant had learned that PCBs were accumulating throughout the environment and were causing serious environmental damage. Defendants each concealed this information from equipment and PCB dielectric fluid purchasers such as Nevada Power in a successful effort to continue sales despite knowledge of the hazardous defect in the product.

9. In the early 1970s, defendants realized that restrictions on the discharges of PCBs to the environment were unavoidable because of looming government regulation in other countries and in individual states. In an effort to delay regulation and to downplay the hazards of PCB dielectric fluids, defendants instigated, through the National Electrical Manufacturers' Assn, an

effort to create industry standards for the electrical utility industry through a group known as the C-107 Committee of the American National Standards Institute. During the lengthy period while the ANSI committee met, defendants continued selling their defective products to Nevada Power Company, knowing that their representations of fitness for the intended purpose were bald lies and would be superseded by ANSI standards.

10. In a further effort to delay government regulation, defendant Monsanto commissioned animal studies of PCB effects at a testing laboratory known as Industrial Bio-Test Laboratories ("IBT"). Monsanto deliberately solicited and obtained falsification of IBT tests in order to obscure the hazards of PCBs and create "defensive data." Monsanto then used the falsified data and the assistance of corrupt scientists at Industrial Bio-Test in a deliberate effort to create "conflicting data" with an honestly-conducted government-sponsored study, thereby delaying government regulation. One of the corrupt scientists involved was later hired directly by Monsanto and given an award for the above-described work in delaying government regulation of PCBs.

11. When Monsanto finally decided that it had no choice but to limit sales of PCBs because of public and government concerns about PCB hazards, Monsanto cold-bloodedly compared its projected profits with projected liability awards against the company and chose to continue selling PCBs for use in equipment sold to Nevada Power and the electrical utility industry because it projected that

its profits would exceed liability awards in cases such as this. However, Monsanto decided to do so, only if defendants G.E. and Westinghouse would agree to indemnify Monsanto for any losses in cases such as this. All defendants entered into this agreement, establishing their malicious intent to continue profiting by defrauding customers such as Nevada Power.

12. From the 1930s onward, defendants regularly exchanged information regarding the harmful effects of PCBs and dielectric fluids containing PCBs in order to develop hygienic practices to minimize toxicity to their own workers. At least by the early 1970s, Monsanto had conducted its own tests and warned G.E. and Westinghouse that combustion of dielectric fluids containing PCBs would produce highly toxic PCDDs and PCDFs. Despite these warnings to each other, each defendant concealed that fact and continued selling dielectric fluids containing PCBs, knowing that an extremely hazardous situation would result if PCBs were burned indoors, the primary place where defendants G.E. and Westinghouse recommended use of dielectric fluids containing PCBs in order to prevent the hazard of fires. Despite this guilty knowledge of the hazard of transformers and capacitors located indoors, defendants opposed, through their trade association, government regulation of PCBs in indoor locations with "defensive data" intended falsely to show that there was no PCDD or PCDF hazard resulting from such uses and delayed related government regulation for several years. Defendants' goal in this massive subterfuge was to continue selling

their defective equipment to Nevada Power and other members of the American electrical utility industry, despite their knowledge that the products were defectively hazardous.

13. No later than early 1988, defendants Westinghouse and G.E. had built up such a stock of "smoking gun" documents, they found it necessary to implement plans to destroy records that might create liability in cases such as this one.

13. While defendants' interrogatory did not call for such detail, Nevada Power anticipates that the more specific facts stated in Appendix A hereto will be presented at trial in support of the fraud claim.

14. Documents supporting the above contentions are described in Appendix B. In addition, Nevada Power gives notice of its intent to rely upon any or all exhibits to depositions not listed in Appendix B, as well as upon other documents not yet received from defendants in response to discovery requests. Furthermore, Nevada Power anticipates that the significance of some documents already received from defendants will not become apparent until further discovery is conducted.

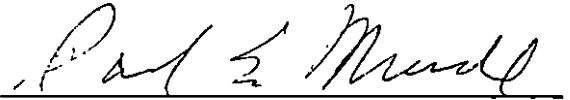
15. Nevada Power has not yet determined who its trial fact witnesses will be. Those persons tentatively identified as such include the persons listed above in response to Interrogatory Six (Nevada Power anticipates that the list will be narrowed

. . . . .

considerably by the date set by the Court for disclosure of fact witnesses and a summary of their anticipated testimonies.)

DATED: May 28, 1993

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AFFIDAVIT OF RICHARD L. HINCKLEY

STATE OF NEVADA        )  
                              ) ss.  
COUNTY OF CLARK        )

RICHARD L. HINCKLEY, under penalties of perjury, being first duly sworn, deposes and says:

1. That he is Vice President, Secretary and Chief Counsel of Nevada Power, Plaintiff herein, and is authorized to make this verification for and on its behalf; that he has read the portions of the foregoing PLAINTIFF NEVADA POWER COMPANY'S MAY 28, 1993 ANSWERS TO DEFENDANTS' SEPTEMBER 14, 1992 CONTENTION INTERROGATORIES designated as responses to interrogatories, and know the contents thereof; that the same is true to be the best of his knowledge, information and belief.

\_\_\_\_\_  
RICHARD L. HINCKLEY

Subscribed and sworn to  
before me this \_\_\_\_\_ day of  
May, 1993.

\_\_\_\_\_  
Notary Public

## APPENDIX A

### SPECIFIC FACTS TO PLAINTIFF'S CONTENTIONS

In October 1975, the EPA wrote to Monsanto requiring the answers to 11 questions. QUESTION 10 asked for:

"A description of any adverse health or environmental effects which you know or believe to have resulted from the introduction of PCB compounds or mixtures into the environment. Indicate any specific occasions including dates, times, locations, amounts, and parties involved for which such effects are known."

In response, Monsanto employee David Wood wrote to Monsanto employee William Papageorge and, specifically, in reference to question 10, stated:

"None? Yusho? Chloracne years ago - Dangerous question."

In its final response to the EPA to question 10, Monsanto stated:

"Monsanto Company is not aware of any health or environmental effects resulting from the introduction of PCB compounds or mixtures into the environment which has not been reported in the scientific and popular press and already known to representatives of the Environmental Protection Agency."

Prior to 1977, no manufacturer of PCBs or of products containing PCBs that were sold to Nevada Power adequately warned Nevada Power about the dangers from exposure to PCBs.

GE wrote in 1972 that the only harmful effect of PCBs on workers was limited to nonchronic chloracne or other temporary skin irritations, misleading the reader about the known toxic effects of PCBs.

At some time post-1973, General Electric stated in its instructions for Pyranol insulating liquid that exposure to Pyranol was relatively harmless to humans, although it still recommended that exposure be held to a minimum, and that operating procedures should require avoidance of contact with Pyranol.

In 1985, General Electric offered services to aid in solving problems with accidents involving PCB-contaminated equipment, and offered to take title and assume full liability for the proper and legal handling and disposal of all PCBs and related equipment.

GE had product specialists for most products.

GE provided marketing information and application information for their electrical apparatus to customers.

GE recommended Pyranol transformers to customers for indoor use.

GE assessed the health effects of PCBs in "The Human Health Effects of Electrical Grade PCBs" authored by Dr. John Brown and Dr. Pocock and Mr. Coe in August, 1981. GE also collaborated in an article which analyzed the intake of polychlorinated dibenzo furans in the Yusho patients.

In 1976, Doctors Richard Lawton and Joseph Feingold, who provided contract medical services to General Electric, initiated a study of GE capacitor workers known to be exposed to PCBs, to attempt to determine if there was any relationship to health or clinical findings related to their levels of PCB exposure. Their findings were published in Effects of PCB Exposure on Biochemical and Hematological Findings in Capacitor Workers in Environmental Health Perspectives in 1985. They were also published in Comparability and Precision of Serum PCB Measurements, reprinted in the Archives of Environmental Health in 1985.

In 1969, Monsanto wrote to General Electric regarding a news article based on marine life research which described PCBs as "a menacing new pollutant." The article stated that PCBs were killing certain marine birds and posed a long-term threat to humans. Monsanto disputed implications from Swedish and American scientists that PCBs were highly toxic chemicals, and stated that PCBs were not toxic unless they were mishandled or misused, as shown by more than thirty years of U.S. production and use.

All defendants misrepresented the risks inherent in the NEMA official standards proposal dated January 25, 1973. The Risks Section III, Section I, Page 1, understates the hazards associated with polychlorinated biphenyls, these hazards were known and widely discussed by the defendants at that time.

Monsanto, Westinghouse and General Electric, through ANSI Guidelines for Handling and Disposal of Capacitor and Transformer Grade Askarels Containing Polychlorinated Biphenyls approved January 9, 1974 misrepresented the known risks and effects of PCBs at that point in time.

In February of 1975, Westinghouse sent a list of seven questions asked by its workers regarding the health hazards of PCBs to Monsanto and asked that Monsanto formulate answers for those questions regarding Inerteen and Askarels. Nevada Power never saw the questions, nor was it provided the answers to those questions.

In 1966, Monsanto first heard of PCBs as a potential environmental contaminant.

In 1957, Monsanto prepared and circulated a technical bulletin seeking expanded use of PCBs into other uses, such as swimming pools and highway markings. The toxicity section of the bulletin said PCBs are not serious industrial health hazards and that there are few instances of skin irritation, thus misleading the readers in an attempt to expand their business.

In 1973, Monsanto wrote to a Westinghouse employee regarding skin irritations that employee had experienced with a PCB product. Monsanto wrote that the PCB mixture was practically "non-toxic" and that it is non-irritating when exposed to the skin, misleading that employee about the known harmful effects of PCBs.

In 1972, Monsanto's confidential in-house Industrial Chemicals Company Functional Products Group report listed biphenyl and Aroclor as highly toxic when ingested or inhaled.

In a 1972 letter to EPA Monsanto claimed that in an effort to safeguard the environment it had already informed all customers of PCB materials of the potential dangers should these materials escape. It was not until June, 1973 that Monsanto advised a customer that PCBs "may be considered contaminants and may adversely affect some species of animal and marine life."

In a May 1972 report to the Interdepartmental Task Force on PCBs, Monsanto represented that the bulk of PCB homologues released to the environment are subject to environmental degradation.

In a July 1973 letter to the EPA, Monsanto states that it began commercial production of PCB in 1929 and that handling of the product at the manufacturing level has not presented problems so long as the proper industrial hygiene practices were followed. The letter also states that PCB levels in the environment have dropped and recommends that PCB effluent standards not be established because of the lack of scientific data.

After a study generated by Dr. Kimbrough that found an alarming rate of liver cancer in rats fed Aroclor 1260, NIOSH called a meeting to explore whether Monsanto had a suitable occupational group for study to assist in studying the potential chronic effects of PCBs.

Even through 1974, Westinghouse told employees during a meeting on the use of Inerteen that unless it is consumed it presents no real danger to them. It was not until 1975 that Westinghouse requested information on the toxicity of Aroclors. Only after receiving questioning did Monsanto admit that Inerteen can cause permanent health effects to humans, and excessive exposure may cause liver damage and chloracne. Monsanto also asserted there should not be any effect on an employee or his family from home laundering of inerteen contaminated clothing. Monsanto also stated there is no evidence that PCBs cause sterilization in humans.

In response to a 1975 request by Westinghouse for medical health information, Monsanto hand-delivered a reply in order to "avoid undue concerns and misunderstandings."

By 1969, Monsanto was working on a substitute fluid for PCBs. Monsanto anticipated terminating use of PCBs because of "pressure on PCBs," not because of concern over environmental contamination. No indemnity agreement was anticipated to be necessary for MCS 1238 because such agreements imply the material is hazardous and undesirable.

In 1975, EPA reported sampling data indicating the presence of PCBs and comparable compounds in the air, water bodies, and fish in several parts of the United States. EPA issued Monsanto a Section 308 request for information on their production and use of PCBs pursuant to EPA's authority under the Federal Water Pollution Control Act.

In 1975, Monsanto and NIOSH attempted to refute Dr. Kimbrough's findings that Aroclor 1260 caused liver cancer in rats. Monsanto and NIOSH also met with several government agencies for the purpose of showing that 1) Monsanto took positive action in response to Dr. Kimbrough's report, and 2) Industrial Bio Test and Eppeley Institute found the lesions were not hepatocellular carcinomas. Neither Monsanto nor NIOSH denied that the PCBs caused liver damage.

In 1976, despite its knowledge that skin contact with Askarels could cause chloracne and inhalation of fumes could cause serious systemic effects, Monsanto maintained that at ordinary temperatures Askarels did not present industrial toxicological problems.

In the early 1970s Monsanto developed and implemented a "worldwide PCB action plan" to establish and promote to customers a control and phase-out program for PCBs. As part of this plan, Monsanto required customers of PCB dielectric fluid to sign indemnity agreements.

By the early 1960s, Monsanto was the only American plant producing PCBs.

In the mid-1960s, the manager of pollution control at Monsanto instructed workers to avoid inhaling vapors from hot PCB operations and not to get it on their skin because it will cause thermal burning.

In 1979 and thereafter, Monsanto provided documents that had to do with health effects of PCBs, studies done by outside consultants to Monsanto, and published peer review journal literature to Congressman Eckhart's subcommittee and agencies including the Edison Electric Institute/USWAG committee, the National Rural Electric Cooperative Association, and the American Public Power Institute, and tracked pending PCB legislation.

Monsanto participated in the Industry Consensus Group, formed in 1980 or 1981, which standardized the manufacturing industry's position for members' intervention in EDF and NRDC suits and provided information to Congressman Eckhart's subcommittee.

In 1985, Monsanto prepared Material Safety Data Sheets on PCBs from information in Monsanto's files as well as information gathered from published literature.

In the lab during 1967-1969, PCB researchers used ventilation fume hoods, but not necessarily gloves because they did not touch the PCBs.

In the 1950s, Monsanto conducted research on pollution control including PCB discharges.

In the 1950s and 1960s, Monsanto participated in pollution control committees of the Ohio River Valley Sanitation Commission, the Manufacturing Chemists Association, and the American Petroleum Institute.

In the early 1970s, Monsanto met with General Electric about a problem at the Hudson River plant. Monsanto gave General Electric information about maintaining health and safety when using Aroclors. Monsanto also shared information on the environmental properties of Aroclors, biodegradation studies, and analytical methods.

In 1971, William Papageorge of Monsanto represented to an ANSI Committee C-107 that the world-wide perception of PCBs was that they were inert and would do no harm to the metabolism of any creature or vegetation.

Nevada Power was not aware of health or safety issues related to PCBs in electrical equipment prior to when the 1979 EPA's PCB regulations were announced.

From the 1950s through the 1980s, Westinghouse and General Electric exchanged information with Nevada Power on a regular basis. During these conversations and meetings Westinghouse and General Electric would recommend equipment, including transformers and capacitors containing askarels, to meet Nevada Power's needs.

Although it had developed its own Inerteen information and handling materials, in January of 1970 Westinghouse distributed Monsanto Askarel and Aroclor information in response to requests for toxicity data for Inerteen sent to Westinghouse.

In 1971, Westinghouse knew that major studies regarding PCBs revealed that PCBs were a persistent environmental contaminant, caused serious internal injuries to humans and animals, and a suspected carcinogen, etc., and yet it provided the National Industrial Pollution Control Council with a paper titled "The Need for Continued Use of Polychlorinated Biphenyls as Electrical Insulating Liquids." In that document, Westinghouse stressed the safety factors of Inerteen as far as flammability is concerned. Without citing any studies or authority, Westinghouse stated that chlorinated biphenyls are considered to be approximately one-tenth as toxic as DDT for mammals. Westinghouse also stated that biodegradability studies with lower chlorinated biphenyls showed that they degrade, which is contradictory to what the actual Monsanto studies were revealing. Westinghouse covered the existing controls that Monsanto has instituted regarding PCB escaping into the environment and then recommended that PCBs not be banned from manufacture and use in closed electrical systems. This indicates Westinghouse's intent to continue reliance by the electrical industry on PCB fluids.

By April of 1972, Westinghouse knew that there was a substantial leakage of PCBs from its South Boston plant and yet only then began to create a rough draft of an internal corporate "Policy for use and Handling of Inerteen". At that point in 1972, Westinghouse also eliminated language in their capacitor warning plate and indicated that that language should be deleted from all warnings to be used in the future. The warning formerly read "this product contains polychlorinated biphenyls, extreme care should be taken to prevent any entry into the environment, through spills, leakage, use, disposal, vaporization or otherwise. Refer to Westinghouse instruction book for information on use, handling, and disposal procedures." The language reading "through spills, leakage, use, disposal, vaporization or otherwise" was eliminated. This indicates Westinghouse's intent to continue its customers' reliance on the product, not to alarm customers and to continue its "benign" appearance.

In its June, 1976 edition of "Instructions and Handling of Inerteen," Westinghouse admitted that Inerteen does have an irritating effect on the skin. Westinghouse did not fully explain the "irritating effect." However, Westinghouse then repeated its representation that Inerteen is generally regarded as being non-toxic to humans. Yet, under "Handling," Westinghouse stated that Inerteen is "highly toxic" if taken internally; it may cause severe irritation of the digestive tract and serious internal reactions; Inerteen was listed as a moderate skin irritant; and Westinghouse admitted that Inerteen can be absorbed through the skin. There is an admission that repeated contact may result in severe dermatitis. This indicates Westinghouse was attempting to alleviate customer concerns about the human health effects of Inerteen.

Westinghouse withheld some information on Inerteen from salespeople who would have been responsible for providing information to customers and instructed the marketing personnel not to answer questions.

From 1948 through 1970, the standard safety procedure for Westinghouse service engineers when working with Inerteen was to coat hands and face with castor oil, and wash it off with soap and water.

Prior to 1970, a Westinghouse service engineer experienced skin irritation from contact with Inerteen.

The legal department at Westinghouse participated in decisions as to whether warnings should be given to customers regarding Westinghouse products.

Within Westinghouse, the ultimate decision to put warnings on Westinghouse capacitors and transformers would have been made by the Vice President of the Transformer Division.

During the 1960s and 1970s, Monsanto and Westinghouse met a number of times to discuss Aroclors. Participants included Lyon Mandelcorn, Tom Dakin, Bob Miller, Don McClain, Ralph Munch, and Paul Benignus. Topics of discussion included the physical electric and properties of Aroclors, alternatives, availability of various fluids, biodegradability of Aroclors, bioaccumulation, fusion of Aroclors and soil, discontinuance of Aroclors for open applications, and effects of Aroclors on certain forms of wildlife.

General Electric's manager of environmental science and technology from 1981 to the present testified he is not aware of any medical record or any data or person with knowledge of data to support the statement "In the United States, medical records show that over a nearly 40 year period, the only adverse health effects experienced by U.S. workers exposed to PCBs, either during the manufacture of these liquids or of electrical equipment containing these liquids have been limited to occasional cases of non-chronic chloracne or other temporary skin lesions or irritations."

In 1970, General Electric prepared a report stating that askarels are only somewhat toxic and that ordinary cleanliness was an adequate safeguard against skin irritation.

In 1976, the Department of Environmental Conservation found that General Electric had discharged PCBs in quantities that violated applicable standards of water quality, and described the breach as the product of both corporate abuse and regulatory failure.

In 1975, GE knew that oxidation of PCBs can lead to the formation of PCDFs which are highly toxic.

General Electric represents that based on its studies of the Yusho patients as published in "Human Health Effects of Electrical-Grade PCBs," PCDFs have a toxic threshold level of 1 to 1.5 milligrams for humans. The most observable toxic symptom was chloracne. Other symptoms in the Yusho patients included hyperpigmentation of skin, malais, ocular disturbances, swelling of eyelids, and curling of finger and toenails. Children born to mothers who had these toxic symptoms also displayed some toxic symptoms.

From 1943 through 1949, General Electric observed adverse health effects in workers, which they claimed were caused by inhalation and absorption through the skin from contact with chlorinated naphthalenes. They did not test for PCBs in the blood during this period. Prior to 1956, General Electric knew of yellow atrophy of the liver related to mixtures of polychlorinated naphthalenes and PCBs; dermal exposure and inhalation were considered probable modes of exposure. Despite this information on toxicological effects, GE did not institute a comprehensive program of examining workers exposed to chlorinated aromatics, including PCBs. GE never informed customers that they should institute medical protocols for workers before, during or after exposure to PCBs.

GE and Westinghouse as well as Monsanto were aware or should have been aware in 1969 of studies in the scientific literature which showed that Aroclors can cause dermatitis and systemic poisoning.

General Electric used chlorinated benzenes in combination with polychlorinated biphenyls in dielectric fluids. The chlorinated benzenes were mixed with Aroclor 1254 and 1260 to reduce the viscosity and make the compound more fluid at low temperatures.

Chlorinated dibenzofurans were present in PCB mixtures produced by Monsanto.

In 1962, Westinghouse's Administrator of Industrial Hygiene and Monsanto's Assistant Director of the Medical Department agreed that both companies should reconsider their statement on Aroclors in any bulletin relative to temperatures above which local exhaust ventilation should be provided. Together they decided it would be a mistake to attempt to describe safe handling practices in generalities. This shows recognition on the part of both manufacturers that the different PCB fluids required different handling procedures, and an intent to continue reliance by customers on the product, without alarming them.

In a 1967 company memorandum discussing an upcoming visit by Westinghouse, Monsanto stated that they had been told by Westinghouse that Westinghouse admitted to not being as careful in their plant procedures as they should be regarding worker safety and handling of Inerteen. Westinghouse found it necessary to visit Monsanto's Anniston, Alabama plant in order to discuss dermatitis from and toxicology of Aroclor 1242.

Monsanto knew in 1970 of nearly 20 instances of illnesses since 1940-45 from exposure to PCBs, yet did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Material Safety Data Sheets from May 1971 for various Aroclor mixtures warn that fire fighters should wear respiratory protection when there is any possibility of exposure to gas or vapors because highly toxic gases can be evolved in fires involving this product. Stated effects of over-exposure are chloracne and systemic intoxication including nausea, vomiting, loss of weight, edema and abdominal pain.

In 1937, Dr. Kelly, Monsanto's medical director, said warnings should be issued that experimental work in animals shows that prolonged exposure to Aroclor vapors evolved at high temperatures or by repeated oral ingestion will lead to systemic toxic effects and that bodily contact with liquid Aroclors may lead to an acne-form skin eruption. Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Without providing scientific basis, Monsanto requested in 1975 that IBT alter its classification of Aroclor 1242, 1254, and 1260 from "slightly tumorigenic" to "does not appear to be carcinogenic." Dr. Calandra of IBT agreed to this misrepresentation, which was intended to mislead customers.

By August of 1970, Westinghouse was aware that Inerteen from at least one its manufacturing plants was being disposed of improperly, as indicated by the fact that the proper "Hazardous Waste" labels and paperwork were not being filled out.

In November of 1975, NIOSH produced a report on PCBs titled Background Information on Polychlorinated Biphenyls. The purpose of the NIOSH report was to advise the occupational health community on hazards of PCBs. The report found that ninety five percent of capacitors at that time contained PCBs, PCBs tend to accumulate in animal tissues, furans and naphthalenes were found in commercial PCBs, and their presence was cited as being of toxicological significance. PCB products were found in heat transfer systems, hydraulic systems, gas turbines, vacuum pumps, plasticizers, textiles, sealants, and carbonless copy paper. In 1975, studies showed that PCBs appear in the tissues of 31% of the people in the United States. Toxic effects of PCBs include chloracne, skin and nail pigmentation, eye discharge and swelling. Pathologists' studies of PCBs effects on animals showed definite malignant, non-malignant and reproductive effects.

Monsanto's Manager of Product Acceptability stated that from 1971 through the first two quarters of 1975 that PCBs were not reclaimed by Monsanto. There is evidence, however, in Monsanto internal memoranda that Monsanto had an active reclamation program in effect during the 1960's.

By 1970, Monsanto was aware that there were numerous articles and studies dating back to 1966 which demonstrated PCBs are not readily biodegradable. Risebrough and Jensen (Sweden) discovered PCB persistence in the environment in 1966.

In 1960, despite evidence in its possession to the contrary, Monsanto stated that "Accidentally spilled" Aroclors "do not cause acute toxicity hazard...years of safe use of Aroclors demonstrate ability to handle fluids without hazard." In this publication, fraudulent and incomplete representations are present. Monsanto continues its inconsistencies in whether or not phosgene gas is formed as a waste product from Aroclors.

In July of 1970, Monsanto's researchers knew of studies dating back to 1966 by Jensen and Risebrough that PCBs accumulate in marine environments and eventually become a toxic hazard. However, Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Paul Wright was hired by Monsanto after leaving IBT to be its Manager of Toxicology. While working for IBT, Wright participated in falsifying test results for Monsanto. Monsanto presented Mr. Wright with a cash bonus and paid hundreds of thousands of dollars for his defense, all the time claiming they were an unknowing victim.

Monsanto misled Congress in 1979 when it wrote that after increasing production of PCBs until the early 1970s it then ceased production because of reported environmental hazards. In fact, Monsanto knew PCBs were present in the environment as early as 1966 and only discontinued production because of concerns over liability.

GE and Westinghouse as well as Monsanto were aware of or should have been aware of studies in the medical literature prior to 1969 which showed that Aroclors can cause dermatitis and systemic poisoning.

By 1966, Monsanto knew that PCBs were considered toxic and that "excessive" exposures could cause liver damage. Monsanto knew that lower levels of exposure to PCBs could cause chloracne. They also knew that inhalation of fumes could result in chest irritation and symptoms resembling a severe chest cold.

By 1970, Monsanto had in its possession studies and references to studies on the toxicity of PCBs which dated as far back as the early 1930s.

In September of 1967, Westinghouse and Monsanto were actively conducting meetings and sharing information on the best methods for handling Aroclor 1242, including problems of its dermatitis and toxicology.

In February of 1968, Westinghouse issued a memorandum that trichloroethylene, Inerteen and other substances could not be poured down the sewer drains. Equivalent warnings to customers not to permit these substances to enter into sewer systems did not issue from any of the defendants until much later.

Westinghouse, in September of 1968, was in possession of facts sufficient to issue an internal memorandum outlining a process spec on the disposal of hazardous waste materials stating they should not be dumped down the sewer.

In a 1968 internal memorandum, Westinghouse was aware that its trash hauler's method of handling and disposing of scrap Inerteen in a local dump was not acceptable. In its internal memorandum, Westinghouse stated that the trash hauler should be informed of the toxicity of any compound from Westinghouse. The Materials & Standards Engineer also noted that there would be a state inspector visiting the plant soon. He then recommended that all sewers where Inerteen is dumped be cleaned and that all workers who handle Inerteen be given proper protective clothing before the inspector arrived. This is an active concealment by Westinghouse of facts from government and consumers.

In January, 1970, Westinghouse revised its process specs for disposal of hazardous material guidelines, which included Inerteen, at their Indiana plant. The revised specifications were to be more stringent than those issued in 1968.

In July of 1970, Westinghouse was actively discussing with Monsanto's Manager of Environmental Control the disposal solutions for askarels. Monsanto suggested that sanitary landfills be used and that those landfills not be located near water systems, both surface and underground, so that after heavy rainfall, escape of PCBs into the environment could be minimized. By 1970, Westinghouse and Monsanto were aware that Askarels, aka Inerteen, cling to soils "tenaciously".

In a September, 1970 internal memorandum, Westinghouse discussed its liabilities regarding environmental contamination by Inerteen and suggested that certain employees begin instituting a program to meet local, state and federal regulations that it knew would be forthcoming. Nevada Power was never made aware by the defendants of the imminent regulations anticipated by the manufacturers until much later, if at all.

By November 1971, after numerous state inspections, Westinghouse was fully aware of the environmental hazards as well as liabilities of dumping Inerteen, and warned its employees through a company memorandum not to dump any Inerteen materials into the sewer system without the proper authorization.

In its 1972 "Policy for the Use and Handling of Inerteen," Westinghouse's T.K. Sloat affirmatively represented that the stability of Inerteen makes it difficult to destroy when it gets into the environment. Westinghouse characterized the problem of Inerteen in the environment as being "extremely serious." Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

By April of 1972, Westinghouse had implemented a program to ensure that all scrap capacitors were completely drained of Inerteen because Westinghouse had entered an agreement with the state of Indiana not to dump Inerteen into landfills or dumps. In a memorandum written that same month, J.L. Shoaff complained that not all capacitors sent to the dump were being completely drained, as per company specs and were therefore causing further PCB contamination in the dumps utilized by Westinghouse.

In a December, 1978 Confidential Memo, Westinghouse admitted that between 1976 and 1977 they impregnated capacitors with both 1016 Inerteen and Wemcol (which is Westinghouse's mineral oil replacement for Inerteen). From 1940 up until 1977, Westinghouse also used Inerteen paper in transformers.

By September of 1958, Westinghouse's Administrator of Industrial Hygiene knew that there should be absolutely no prolonged skin contact with Inerteen. Yet, in an advisory letter responding to a request for information, he stated Westinghouse had very little difficulty with dermatitis. He also advised that "good, general ventilation" was sufficient to avoid any problems with Inerteen vapors. Inerteen transformer oil was described as being a mixture of 60% hexachlorodiphenyl and 40% trichlorobenzene. These substances were the subject of extensive earlier studies on Inerteen. In view of the results of early studies on Inerteen, these warnings were inadequate.

In July of 1970, Westinghouse's Materials & Process Engineer "strongly urged" in an internal memorandum that immediate action be taken to clean Inerteen from washers and drains in their Bloomington, Indiana plant because of potential legal action against Westinghouse if any Inerteen is found in city or storm sewer systems. Westinghouse felt that this was an "urgent matter" and that remediation should begin immediately. Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

By December, 1971, in an internal company memorandum stamped "Proprietary Class One Strictly Limited Distribution. The Westinghouse Research Director for Power Systems stated that "the biological activity of PCBs was at best poorly defined." He also stated (1) that higher chlorinated biphenyls appeared to concentrate in tissues of fish, birds and animals; (2) that the toxicity of PCBs in any absolute terms cannot be expressed, but there is an indication that lower chlorinated biphenyls appear to be more toxic; (3) with respect to birds, the hatchability of eggs is reduced; and (4) the problems from the Yusho incident in Japan. He repeated Monsanto's claim that Askarels are essentially free from furans, but admitted that Westinghouse had no analytical data from Monsanto or from in-house Westinghouse labs to confirm that information. He admitted that as one approaches highly populated areas, the ratios of PCBs to DDT in the environment increases to about three to one. He also confirmed that the concentration (in 1971) of PCBs in the general environment appears to be about one part per million (ppm). He also stated that there were significantly higher concentrations than 1 ppm in various tissues and organs of fish or other animal species (suggesting bioaccumulation). He went on to state that there is sufficient evidence that PCBs can be deleterious to the health of animal and human life and that the risks of ignoring the evidence that does exist is inappropriate for Westinghouse.

By August of 1970, Westinghouse was aware that Inerteen from at least one its manufacturing plants was being disposed of improperly. For example, the proper "Hazardous Waste" labels and paperwork were not being filled out.

All of the significant facts in Plaintiff's exhibit 1148, which is too voluminous to set out separately.

Defendants knew as early as 1970, or even by the late 1960s, that legislation would be enacted restricting or eliminating the use of PCBs yet they did not impart that information to Nevada Power.

Defendants knew since the 1930's that PCBs are among the most stable compounds known, yet they either did not conduct studies to determine the ubiquitous nature of PCBs in the environment until the late 1960s or early 1970s, or they conducted the studies and did not make them public.

Defendants claim the early reported health and/or environmental problems with PCBs in certain waxes, including Halowax, were actually problems associated with chlorinated naphthalenes. Those waxes, including Halowax, were actually a combination of PCBs and chlorinated naphthalenes. The defendants did not conduct studies to determine whether the reported adverse health and/or environmental affects were caused by the chlorinated naphthalene, the PCBs, or the particular combination used in formulating these products; however, they nonetheless claimed that the toxicity observed was due only to exposure to naphthalenes, knowing that they lacked sufficient information to make such a claim, and while internally and amongst themselves regarding the subject studies as being indicative of PCB effects.

There was a substantial body of medical, epidemiological, and scientific information suggesting that exposure to PCBs is hazardous to human health and the environment, yet defendants did not relay that information to Nevada Power prior to selling PCB-containing electrical transformers and capacitors to Nevada Power.

A Monsanto report from 1955 stated that:

"There is need therefore to give warning [regarding exposure to aroclor - PCBs]. For the toxicity of these compounds has been repeatedly demonstrated, both from the standpoints of their absorption from the inspired air, as well as from their effects in producing a serious and disfiguring dermatitis when allowed to remain in contact with the skin."

The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

As early as 1970, congressional action aimed at eliminating PCBs from manufacture or use was prepared in the United States, yet defendants failed to warn Nevada Power that regulation was under consideration while defendants continued to sell PCB-laden equipment to Nevada Power.

A 1972 MSDS did not mention that exposure to PCBs can cause liver damage, nor did it mention that PCBs get absorbed through the skin, nor did it mention other adverse health and environmental effects from PCBs.

In 1956, GE wrote a technical services bulletin where it summarized over 40 studies showing that askarel (PCB) had an adverse effect on humans and on the environment, yet it did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

By 1979, GE had selected polydimethylsiloxane (silicone) as a substitute for PCBs.

In 1937, a round table discussion followed presentation of a report prepared, in part, by Dr. Cecil Drinker. In the discussion, reports were made of workers injured, or killed from exposure to PCBs. Over 50 GE workers were alleged to have a skin condition known as chloracne, and over 10 of those had conditions that were severe. Dr. Schwartz reported at that round table discussion in 1937 that any worker suffering from chloracne may also be suffering from systemic poisoning from exposure to the PCBs. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1937, a round table discussion followed presentation of a report prepared, in part, by Dr. Cecil Drinker. In the discussion, reports were made of workers injured, or killed from exposure to PCBs. Over 50 GE workers were alleged to have a skin condition known as chloracne, and over 10 of those had conditions that were severe. Dr. Schwartz reported at that round table discussion in 1937 that any worker suffering from chloracne may also be suffering from systemic poisoning from exposure to the PCBs. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Recent studies show a statistical relationship between exposure to PCBs and malignant melanoma, breast cancer, and an increase in brain tumors from workers exposed to PCBs.

The information contained on the Material Safety Data Sheets prepared by Monsanto for Aroclor (PCBs) in the 1980s was known to it well before 1960, yet the earlier MSDS sheets did not contain the warnings that appeared in these 1980 MSDS sheets.

Defendants participated in the major efforts to evaluate the health and environmental effects resulting from PCBs, including a group known as C-107 and NEMA. Defendants had employees who were in charge of these groups and committees, and Defendants--through their participation in these groups and committees--concealed and downplayed information regarding their vast historical knowledge of the adverse health and environmental effects resulting from exposure to PCBs. The results of Defendants' participation in these groups and committees were reports that underestimated the danger of exposure to PCBs and delayed and avoided adequate warnings and disclosures that would have averted some of the harm that befell Nevada Power.

In 1938, Dr. Drinker prepared a report, at the request of Monsanto, to determine health problems associated with PCBs. Dr. Drinker reported liver disorders and other serious health problems. At no time did Monsanto relate this information to Nevada Power.

Monsanto produced internal documents, intended only for Monsanto employees, as early as 1955, that described the potential harmful effects of PCBs, including chloracne, digestive problems, and liver problems. Monsanto recommended strict hygienic practices for workers exposed to PCBs, including a daily change of clothing. The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Monsanto encouraged its employees take baths, on company time, at the end of their shifts to reduce PCB hazards, yet Nevada Power was never warned of the need for such practices on an adequate or timely basis, nor was other information imparted to Nevada Power concerning the precautions Monsanto and the other defendants gave to their workers who were exposed to PCBs.

In 1955, Monsanto's medical department director wrote: "MCC's [Monsanto's] position can be summarized in this fashion. We know Aroclors are toxic but the actual limit has not been precisely defined. It does not make too much difference, it seems to me, because our main worry is what will happen if an individual develops any type of liver disease and gives a history of Aroclor exposure. I am sure the juries would not pay a great deal of attention to MACs [maximum allowable concentrations]."

In 1957, Monsanto wrote an Aroclor Bulletin for use in resins and plasticizers for chlorinated rubber. In the section on toxicity, Monsanto stated:

"Animal toxicity studies and 20 years of manufacturing and use experience indicate that aroclor compounds are not serious industrial health hazards. If the materials are heated to volatilization, ventilation should be provided to prevent inhalation of vapors. This is true of other major components of the formulation as well as the Aroclor compounds. Repeated or prolonged skin contact should be avoided although there are few instances of skin irritation. Human patch tests with finished products containing Aroclor compounds have shown no irritation."

These statements misstated the knowledge of the health hazards known by Monsanto to be associated with exposure to PCBs on that date and continued an ongoing pattern of disinformation provided by Monsanto to industries purchasing PCBs.

In 1959, Monsanto's assistant medical director wrote:

"This indicates to me, however, that sufficient exposure [to PCBs] whether by inhalation of vapors or skin contact, can result in chloracne which I think we must assume could be an indication of more serious systemic injury if the exposure was allowed to continue."

The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Monsanto knew in 1936 that inhalation of PCB vapors could cause liver damage, yet did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Defendants deliberately misled the public and governmental agencies about the health and environmental problems associated with exposure to PCBs.

In 1969, Monsanto knew it had not adequately warned customers about the dangers of PCBs.

In 1970, Monsanto's medical department director wrote:

"All in all, this [finding PCBs in milk and silage and silos] could be quite a serious problem, having legal and publicity overtones.

"This brings us to a very serious point. When are we going to tell our customers not to use an Aroclor in any paint formulation that contacts food, feed, or water for animals of humans? I think it is very important that this be done."

Monsanto had Industrial BioTest Laboratories conduct various PCB studies. Conditions were atrocious in the section that housed the rats. One room was called the "swamp" because it was so wet. Outdoor animals entered "the swamp" and other rooms and ate the limbs off laboratory rats. Others escaped their cages and ate the limbs off those that didn't escape. The deaths of rats, and procedures in the lab, seriously compromised the study results. Monsanto should have known that the tests were seriously compromised, or the results falsified, based upon the markings of the test results and protocols and other documents provided to it by IBT. On the PCB rat study conducted by IBT for Monsanto, Monsanto solicited, and IBT agreed, to falsify the conclusions of the study report, indicating that PCBs were non-carcinogenic. The falsified report was transmitted on Monsanto's behalf to the U.S. government with the intent that the government rely upon the report in making regulatory decisions regarding PCBs. Monsanto experts visited the IBT lab and toured the swamp and other areas, and were aware of conditions at IBT. Paul Wright, at first a Monsanto employee, transferred to IBT and ran these lab tests. He then transferred back to Monsanto as Manager of Toxicology. He was prosecuted, along with three other IBT employees, for fraud in connection with IBT tests. Three of the four were convicted of fraud. Monsanto paid over \$1 million for the legal defense of Paul Wright. Dr. Wright received an award from Monsanto for his work at IBT for forestalling regulatory and congressional action relating to PCBs. Dr. Wright pled the Fifth Amendment to the United States Constitution when questioned about IBT activities relating to PCBs. IBT and Monsanto entered into a tacit agreement whereby IBT agreed "to be of help in any way that you [Monsanto] may wish."

PCBs were so toxic and hazardous to the environment that Monsanto, the sole US producer and supplier of PCBs used in electrical transformers and capacitors, required its customers to enter into indemnity agreements indemnifying Monsanto against any claims for damages.

In March of 1972, Monsanto wrote to the EPA that it had warned its purchasers of PCB fluids of "the potential dangers should these materials escape" when, in fact, that information was never imparted to Nevada Power.

Monsanto's medical department existed in the 1930s and continuously kept current since that time on the scientific literature relating to the toxicology of PCBs.

All reports on "Standard Manufacturing Processes" for Aroclors were intended only for Monsanto employees and were not intended to be distributed to the public.

In internal Monsanto manuals dated October 1969, September 1968, and January 1969, instruction for prevention of accidents are detailed. Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1969, Monsanto was actively discussing the foreseeability and possibility of total control over Aroclor materials and the importance of that control for future operations of Monsanto. Monsanto also admitted that they were putting reclaimed Aroclor into Pydraul hydraulic fluid. This information was never imparted in an adequate or timely manner to Nevada Power.

By March of 1970, Monsanto's Medical Director wrote in an internal memorandum, asking the question "(W)hen are we going to tell our customers not to use any Aroclor in any paint formulation that contacts food, feed, or water for animals or humans?" He stated that it could have serious legal and publicity overtones. He noted that contamination of silage due to paint formulations containing Aroclor could be a serious problem.

In a November, 1972 Safe Practice Data Sheet from Westinghouse, Westinghouse stated that Inerteen vapor is moderately toxic, and the possibility of a health hazard from Inerteen vapors at room temperature is very low. However, higher temperatures cause higher concentrations of Inerteen vapor and increases the health hazard. Westinghouse proceeds to state that Inerteen is moderately toxic if taken internally. This is in contrast to Westinghouse's Inerteen Instruction and Handling Manual of 1971 which states that Inerteen is highly toxic if taken internally. By 1972, Westinghouse knew that other, health problems could result from exposure to Inerteen (liver damage, for example). The Safe Practice Data Sheet also recommended that anyone developing a skin

irritation or respiratory tract irritation due to Inerteen or its vapors should be placed under physician's care, and that all applicants for jobs which involve Inerteen should be screened for and placed properly.

In September of 1938, through a report to the Monsanto Chemical Company by Cecil K. Drinker, M.D., Monsanto learned of the toxicity of chlorcosane, diphenyl phthalate, chlorinated diphenyl and chlorinated diphenylbenzene mixtures.

In 1969, Monsanto knew that landfill disposal of scrap Aroclors would soon end and was actively discussing the possibility of installation of an incinerator to handle scrap Aroclors.

In July 1955, Westinghouse's Department of Industrial Hygiene and Toxicology was conducting tests on evaluation for use in manufacturing operations the product Inerteen, and was requesting from the medical department any necessary information from either fire or health standpoints.

In a report written in 1955, Monsanto was aware that they had always supplied the clean change of clothes everyday for operators of Aroclor manufacture at the Krummerich plant and that time was allowed at the end of the shift bathing. In the Monsanto report at least five studies were cited which covered the hazards of Aroclor production and polychlorinated diphenyls and biphenyl production. In 1951, in a report written by Monsanto on the Aroclors and their toxicity, Dr. Jenkins of the Anniston plant admitted that they had suffered cases of dermatitis from flaking of Aroclors when it was placed on wires. In an article from "The Chemist Analyst", Volume 36, No. 2, Page 33, from the J.T. Baker Chemical Company, in Phillipsburg, New Jersey, dated September, 1947, the chief industrial hygienist in the division of health for the City of St. Louis, Missouri, who wrote regarding the Monsanto Aroclors that the toxicity of Aroclors has been repeatedly demonstrated, from the standpoints of their absorption from the inspired air, as well as from their effects in producing serious and disfiguring dermatitis. It was also stated that these effects had been repeatedly observed. Therefore, this chief of the industrial hygiene section recommended that scrupulous cleanliness be insisted upon wherever the material was handled. In 1950, Mr. A.C.W. Pennington wrote that the men at the Anniston plant are expected to take a bath on their time at the end of each shift. He also found that at the St. Louis plant B, the Aroclors Building is rated a toxic department. He went on to state that each operator is provided with a complete set of clothing comprising hat, coat, trousers, combination underclothes, socks, rubber shoes. The St. Louis Plant is the Monsanto St. Louis plant. He also goes on to state that those workers at the St. Louis Plant B of Monsanto received paid bathing time at the end of each shift. Monsanto also provided employees in toxic departments annual medical exams and lung x-rays every three years. Furthermore, Mr. Benignus, of St. Louis Monsanto, in September,

1953, acknowledged the dangers of using Aroclors in indoor paints. None of this information was ever related to Nevada Power.

In 1962 Westinghouse informed Monsanto that the temperatures Monsanto had listed in its Aroclors technical guide above which exhaust fans needed to be provided if Aroclors were heated were way to high. Westinghouse and Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1969, in spite of knowing of the environmental hazards of Aroclors, Monsanto appropriated \$1,100,000 for solid Aroclor expansion uses at the Anniston plant.

In November, 1969, Monsanto stated that its worldwide Aroclor business amounts to 104 million pounds per year, which represented \$22,000,000 worth of sales. Monsanto's medical director in November of 1969, admitted that Aroclors had been found at locations in water, in birds and some forms of aquatic life. He also admitted that there was evidence of ecological build up. He also stated that the lower Aroclors such as 1248 and 1242 were, in 1969, only believed to be biodegradable, but that it had not been conclusively established. In that same meeting, Bergen and Springgate admitted that there was no evidence as to whether or not Aroclors could escape from end products in plasticizer uses, through leaching or by disbursal and burning. They recommended a plan to establish a program for each business group and consumer market to assure that PCBs would not escape.

Monsanto prepared various technical bulletins encouraging the expanded use of PCBs but which did not warn readers of the known health and environmental hazards of PCBs, nor of any congressional action against PCBs, nor of other countries restrictions on the use of PCBs.

In a March 1969 statement, despite contrary study results by Swedish and American studies, Monsanto stated that PCBs are not toxic unless mishandled.

Monsanto prepared a PCB environmental pollution abatement plan around 1970. In that plan, they identify the problem as "damage to the ecological system by contamination from polychlorinated biphenyl (PCB)." It was acknowledged that the problem involved the entire United States, Canada and sections of Europe especially the United Kingdom and Sweden. As the investigation broadened over other areas of Europe, Asia and Latin America were projected to become involved, evidence indicated that contamination was detected in very remote parts of the world. Under "Nature of the Problem," Monsanto admitted that "truly, the PCB's are a worldwide ecological problem." Monsanto admitted under "Legal Liability" that "direct lawsuits are possible. The materials are already present in nature having done their 'alleged damage.' All customers using these

products have not been officially notified about known effects nor do our labels carry this information. These are only a few of the possible legal implications which would best be covered by the legal department." Monsanto admitted it was responsible for the pollution problem in the United States and partly responsible for the pollution problem in Great Britain. A short term goal was to recommend reasonable action that will not unduly (sic) alarm the market but reduce the exposure in terms of liability. A graph of profits and losses under various scenarios was presented showing Monsanto would lose all profits if it discontinued the use of PCBs. None of this information was made known to Nevada Power.

By 1972, Sweden had proposed a ban on import, manufacture, and sale of PCBs, yet this information was not imparted to Nevada Power.

Monsanto learned in February of 1971 that legislation was proposed in Massachusetts banning the discharge of PCBs to the environment. They did not impart that information to Nevada Power, or on the discovery of PCBs as high as 40 ppm in the fatty tissue of chickens in New York; nor that Monsanto's Pensacola Textile was ordered by the state of Florida to take emergency measures to prevent PCBs from entering the Escambia River estuary and bay, nor did they inform Nevada Power of the developing data throughout the world that was reporting PCBs in the environment and in the human food chain. They did not inform Nevada Power of the international actions taken to eliminate or reduce PCB discharge, manufacture or use.

In 1942, Monsanto's researchers knew to avoid breathing PCB fumes and avoid prolonged contact with the skin since PCBs are absorbed through the skin. This information was not adequately provided to the manufacturers until it appeared on Monsanto's container labels years later.

In 1942, Monsanto's researcher did not know that fumes from PCBs could be toxic to the liver and kidney despite the fact that Drinker had conducted studies for Monsanto which showed systemic effects from chlorinated diphenyls and chlorinated naphthalenes.

In 1942, Monsanto's researcher did not know that fumes from PCBs could be toxic to the liver and kidney despite the fact that Drinker had conducted studies for Monsanto which showed systemic effects from PCBs and chlorinated naphthalenes.

By the mid-1970s, Monsanto found chlorinated dibenzo furans in PCBs manufactured by Monsanto, specifically in Aroclor 1254.

In 1975, Monsanto acknowledged in a letter to Westinghouse that systemic injury to the liver can occur from exposure to PCBs, yet the defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Two courts have held that a document from Westinghouse indicates it intended to defraud the courts of the United States by destroying documents regarding Westinghouse's knowledge of the hazards of the toxic chemicals it uses.

In a study by W.T. Reed, Jr., M.D., conducted in 1938, Westinghouse was put on notice that Inerteen, which is described as a mixture of trichlorobenzene, ethyl-tetra-penta-chlorobenzene and chlorinated diphenyl was lethal when administered to rats and caused damage to the stomach, intestines and liver of the rats. There were also indications that inhaled vapors from the Inerteen caused damage to the lungs of rats and, when applied to the skin, was absorbed through the skin of these animals. Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1938, Dr. Von Oettingen wrote an article on the toxicity and potential dangers of that Inerteen, a PCB dielectric fluid sold by Westinghouse. He concluded: (a) Inerteen was less toxic than trichlorobenzene, which was used in Inerteen; (b) that the intake of fatal doses (perhaps three to five teaspoon fulls) will cause hyperemia of all internal organs, extensive degeneration of the liver, and damage of the mucous membranes of the stomach. With smaller doses, effects were less severe and there was some tendency toward healing if further absorption was prevented; (c) simple contact of Inerteen with human skin caused dryness of the skin, thickening and scaling, and sufficient quantities may be absorbed in this way to cause damage of the liver; (d) Inerteen contact with the skin should be avoided; (e) in view of the possibility of a toxic action of this material on the liver, persons suffering from injuries of the liver (jaundice), syphilis, and heart diseases should be excluded from operations where Inerteen is handled; and (f) workers handling Inerteen or with frequent exposure to its vapors should undergo periodic medical examinations. This information was not conveyed to customers in a timely manner, or in adequate detail.

By 1947, Westinghouse and its Industrial Hygiene Engineer, E.C. Barnes, were aware that Inerteen would cause disabling or fatal internal bodily injury if sufficient amounts of its vapors were inhaled. They were also aware that Inerteen is highly toxic if taken internally. Furthermore, they were aware that Inerteen could be absorbed through the skin and could produce toxic reactions internally as well as chloracne externally. They knew contact with the skin should be avoided and that proper periodic physical examination should be made by the medical department on any workers who worked with Inerteen. None of this information was conveyed to Nevada Power either in a timely mannner or in adequate detail.

By October of 1946, Westinghouse was aware that Inerteen could break down while it was in a transformer and form other compounds.

By 1946, Westinghouse was aware that PCBs could be absorbed through the skin and that chloracne was associated with Inerteen contact. In addition, Westinghouse recommended that if one spilled Inerteen on one's clothing, the clothing should be laundered immediately and should not be worn again until it had been laundered.

In July of 1955, Westinghouse represented that Inerteen would cause very little dermatitis during handling and special ventilation is not required. Only one of the many Inerteen decomposition products listed was hydrochloric acid vapors.

In July of 1955, Westinghouse represented, in spite of knowledge gained in the 1940s and late 1930s indicating otherwise, that Inerteen would cause very little dermatitis during handling and Westinghouse suggested it would be desirable to prevent continuous or repeated contact of the skin with Inerteen. Only one Inerteen decomposition product was listed and that is hydrochloric acid vapors.

By 1956, Westinghouse knew that dumping Inerteen into storm or drain sewers could contaminate a water source for drinking purposes. Although Westinghouse knew that Inerteen could be highly toxic if swallowed, they stated that if the Inerteen were to contaminate a drinking water source, they didn't believe it would cause people to become ill.

By 1956, Westinghouse had requested and received toxicity data on Aroclors 1260, 1254 and 1242 from Monsanto. Westinghouse requested detailed information from Monsanto regarding equipment used to measure concentrations of Inerteen in the air.

In 1958, in a response to an inquiry from Weirton Steel Company regarding unpleasant fumes from transformer Inerteen and requesting suggested precautions, Westinghouse stated that it had not experienced significant dermatitis from people in contact with PCB transformer oil and that the fumes from the material at room temperature would not be sufficient to require any local exhaust ventilation. This contradicts what Westinghouse had knowledge of based on studies conducted previous to 1958.

In 1970, Westinghouse and Monsanto consulted each other on proper disposal techniques and defined characteristics for landfill areas.

In 1970, Westinghouse had devised a plan for disposition of scrap Inerteen and Inerteen-contaminated materials. Westinghouse recognized that PCBs may be an environmental contaminant, requiring proper disposal by authorized scrap dealers only.

In 1972, Westinghouse knew that information concerning what to do with failed capacitor units was disseminated very poorly. Westinghouse was unwilling to accept trade-in capacitors because their position with regard to landfill facilities was tenuous and

felt that they needed to be able to dispose of their own scrap. Westinghouse was concerned with incurring liability if they accepted other capacitors for disposal. Westinghouse knew that field disposal of retired or failed capacitors by users had not been dealt with adequately.

In November of 1986, in a publication entitled "Industrial and Hazardous Waste Management" Westinghouse published an article entitled "Pyroplasma Waste Destruction." In that article, Westinghouse stated that PICs, specifically chlorinated dioxins and furans, are by-products of incomplete combustion of PCBs.

By July of 1956, Westinghouse's Administrator of Industrial Hygiene, in a letter to Monsanto's Assistant Director of the Medical Department, admitted knowledge that by pouring Inerteen into open sewers it could enter the ground water sources and thereby contaminate drinking water sources.

In 1959, Westinghouse's Administrator of Industrial Hygiene made handwritten notes on a request from the U.S. Navy requesting information on Inerteen oil's toxicity, its composition and effects on the skin, precautions to be taken regarding ventilation and personal protective equipment, and maximum allowable concentrations in the air. These handwritten notes stated that high concentrations in the air could irritate eyes, nose and throat and that it would be possible to have internal reactions. He also wrote it was highly toxic if taken internally, that prolonged skin contact could cause severe dermatitis and that skin absorption could occur. He further recommended the use of cartridge respirators or some other form of self-contained breathing apparatus.

In 1959, in a formal response to the Navy, Westinghouse stated that chloracne could occur from prolonged or repeated skin contact; advised of the Maximum Acceptable Concentrations for Inerteen vapors; and warned that high concentrations of fumes may produce irritation of the respiratory tract, eyes and throat, and that significant vapors should not be released at temperatures below 150 F. where good general ventilation was provided. Westinghouse advised that all respiratory equipment should have the U.S. Bureau of Mines approval for intended use, and that adequate ventilation was always preferable to provision of respiratory protection when practical to do so.

By October, 1959, in a letter responding to questions regarding Aroclor toxicity, Monsanto's assistant medical director admitted that toxicity studies had been done on Aroclor 1242 and 1254 by Monsanto. He also stated that prolonged or repeated skin contact could lead to chloracne. He also admitted that exposure to fumes could cause chloracne and that sufficient exposure and chloracne could be indicative of a more serious systemic injury. Monsanto recommended that good local ventilation be provided where Aroclors

are worked with. As to the toxicity of trichlorobenzene, the assistant medical director referred the questioner to Public Health Service publication No. 414 titled "The Halogenated Hydrocarbons Toxicity and Potential Dangers" by Dr. Von Oettingen.

By October, 1959, in a letter responding to questions regarding Aroclor toxicity, Monsanto's assistant medical director admitted that toxicity studies had been done on Aroclor 1242 and 1254 by Monsanto. He also stated that prolonged or repeated skin contact could lead to chloracne. He noted that exposure to fumes could cause chloracne and that sufficient exposure and chloracne could be indicative of a more serious systemic injury. In 1959, Monsanto recommended that good local ventilation be provided where Aroclors are worked with. As to the toxicity of trichlorobenzene, the assistant medical director referred the questioner to Public Health Service publication No. 414 titled "The Halogenated Hydrocarbons Toxicity and Potential Dangers" by Dr. Von Oettingen.

In a report on environmental contamination to Westinghouse, a researcher found in 1972 that Inerteen at the Westinghouse plant in Indiana was leaking or leaving the property by five routes. Until six months before this report was written, it was common practice for Westinghouse in 1971 and 1972 to wash PCB capacitors down and to let the effluent flow into the sanitary sewer system.

In a report on environmental contamination for Westinghouse, a researcher found in 1972 that Inerteen at the Westinghouse plant in Indiana was leaking or leaving the property. Until six months before this report was written, it was common practice for Westinghouse to wash PCB capacitors down and to let the effluent flow into the sanitary sewer system. The creek that the sewer system emptied into went to the sewage treatment plant and then was expelled into a creek which fed a reservoir from which the community drew its drinking water. Of the landfills utilized by Westinghouse, the researcher recorded substantial quantities of PCBs leaching into nearby creeks and rivers which ran through animal and dairy farms, contaminating the milk and the meat of the animals, as well as the fish in those streams. Fillets of fish that were caught in one river and purchased commercially by the researcher showed PCB contamination far beyond the acceptable FDA limits. There were also a number of spills and sites around the Westinghouse plant in which PCBs were released into the environment and into water systems.

By June of 1972, Westinghouse was aware of and worried that any advice which they might give on disposal of used capacitors or transformers might be used to pin liability on Westinghouse if the advice was later disallowed by a federal or state regulation. In addition, Westinghouse admitted that field disposal of retired or failed capacitors, by users, had not been dealt with adequately. However, information that was issued in 1972 to those users of

failed or retired capacitors were (1) a letter issued to Westinghouse Engineering Managers and Sales Engineering Managers and Holders of Capacitor Catalogues; (2) capacitor units carried a caution nameplate, which did not adequately or fully describe disposal methods; (3) capacitor instruction sheets, which did not detail proper disposal methods.

In March of 1975, Monsanto sent a list of answers to questions submitted by Westinghouse on the hazards and toxicity of PCBs. In response to the first question, Monsanto admitted that prolonged excessive exposure could cause chloracne and that in animals, a liver effect is demonstrated. Monsanto then stated that animal data and human experience indicate that the toxic effects are similar in animals and in humans, whether or not exposure results from ingestion, inhalation or absorption through the skin. Monsanto stated PCBs have no effect on human reproductive system. In response to Question 3, regarding PCBs' effect on birds, Monsanto admitted that there is a potential real effect to all animals, including death in humans. Monsanto then stated that there should be no problem with washing contaminated clothing with the clothing of the rest of the employee's family, and that Inerteen should not be on the floor because it will damage the soles of the shoes and eventually be absorbed through the soles of the feet into the human body. In a separate memo regarding the same communication from Monsanto to Westinghouse, Monsanto's Manager of Product Acceptability requested that the questions and answers be delivered personally to the Westinghouse plant and that the Monsanto representative who delivered the answers remain on the Westinghouse plant premises to discuss the proper method of presenting this information to the employees of Westinghouse.

In September 1975, Monsanto was structuring its future production programs on the basis that PCB would be discontinued, either through government edict, Monsanto decision, or utility industry decision. Monsanto had decided that no indemnity agreement would be used by Monsanto in the sale of Aroclor 1238 because it would imply that the materials of 1238 would be hazardous.

Through a 1938 study submitted by W.F. Von Oettingen, Westinghouse knew that fatal doses of Inerteen caused massive congestion of all viscera, extensive degeneration of the liver and ulceration of the gastric mucosa. Westinghouse knew that continuous application of Inerteen to the skin caused dryness, thickening and scaling, and observations made on rats indicated that sufficient quantities may be absorbed through the skin to produce injurious effects on the liver. Westinghouse, knew that vapors liberated from boiling Inerteen and boiling transformer oil were an irritant, and that Pyranol was also an irritant to the lungs, eyes and mucosa. It was suggested to Westinghouse that the contamination of the air to Inerteen fumes be below 0.05 milligrams per liter of air. It was also suggested that Westinghouse employees use greatest care in personal hygiene. Von Oettingen suggested that contamination of

the skin be avoided by wearing protective clothing, and that individuals suffering from injuries of the liver, syphilis and health diseases be excluded from operations in which Inerteen was handled, and that workers handling Inerteen should have periodic medical examinations. Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Through a 1938 study conducted by A.J. Fleming, M.D., Westinghouse became aware of the toxicology of Inerteen by oral administration, skin application, and inhalation experiments in rats. Through this study, Westinghouse became aware that trichlorobenzene was liberated at a temperature of 90 degrees, Celsius when Inerteen was heated. Westinghouse became aware that the maximum concentration should be either 4.5 milligrams per liter if it was in closed space 14 inches above the product, or 0.56 milligrams per liter if it was in a closed area only five inches above the Inerteen. The maximum recommended concentration in a room was 1.9 milligrams per liter of air. Westinghouse also became aware that there was a sample test which would detect concentrations of Inerteen which were below .048 milligrams per liter. Westinghouse also learned that the minimal fatal oral dose of Inerteen is 3.5 cc's per kilogram. In regards to a skin hazard, Westinghouse learned from this study that if constant exposure was long enough, it could render an exposed person susceptible to dermatoses.

In 1938, through a study done by W.T. Read, Jr., M.D., Westinghouse knew that large doses of Inerteen caused terminal passive congestion of the viscera, extensive degeneration of the liver with necrosis about the central veins, and local ulceration of the gastric mucosa in rats. Westinghouse knew that absorption through skin application caused changes in the liver, while the skin showed no gross change. Inhalation tests indicated high incidents of lung infection. Results of the Read, Fleming and Von Oettingen tests appeared in a Westinghouse publication titled "The Toxicity and Potential Dangers of Inerteen".

Westinghouse did not conduct meetings with the Marketing Department regarding the toxicity of PCBs.

Bob Sawyer and others from Westinghouse headquarters reviewed and took boxes of data on capacitors manufactured between 1962 and 1977. The data included test information, nameplate books, and supplier test reports.

Between 1957 and 1988, Westinghouse's quality control engineer was not informed of health hazards from working with Inerteen including that Inerteen is a toxic material which must be handled carefully and cleaned up promptly to prevent contamination of the storage area. Neither were they informed that prolonged exposure could cause internal bodily injury including disability and death or that workers should be examined periodically.

By the late 1950s, Westinghouse PCB workers at the Bloomington plant were aware of, and some workers experienced, allergic skin reactions caused by PCBs.

Westinghouse's sales people were trained in the sale and application of Inerteen transformers and were given the most current knowledge available on government regulations and the government trends. Instruction books provided to salespeople informed them that PCBs were a potential skin irritant. The training books did not provide information on other possible adverse health affects.

Monsanto documents in the possession of Westinghouse's chemist which related to physical, electrical, and chemical properties of PCBs were taken by Westinghouse attorneys. Some of the files, such as Monsanto brochures, were not returned. The brochures and files were taken for litigation purposes. Some of the reports taken were authored by Tom Dakin and Bob Miller.

In 1971, Westinghouse knew from material obtained from Monsanto that lower chlorinated biphenyls were more toxic than higher chlorinated biphenyls.

By 1976 Westinghouse was testing mineral oil for contamination of PCBs. Test results on some samples showed more than 500ppm of PCB.

Mineral oil was intentionally contaminated with PCBs by defendants Westinghouse and GE, yet those defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Westinghouse and GE attempted to enter into indemnification agreements with some of their customers who purchased PCB laden electrical transformers and capacitors from these two defendants.

All of the facts contained in Plaintiff's exhibit 1184, which is too voluminous to summarize.

In 1969, Monsanto's corporate development committee was told that PCBs are highly toxic to birds, yet they did not tell that to Nevada Power. It was presented that the PCB problem is a serious matter because of the pollution and because of the \$22 million worldwide customer business involved with resultant gross profits of \$10 million and a net investment of \$9 million. In addition, there could be possible legal and public relations problems leveled against Monsanto. Monsanto never informed Nevada Power of its corporate financial interest in maintaining PCBs, nor that it was considering possible legal and public relations problems associated with the manufacture of PCBs.

Defendants were required to prepare Material Safety Data Sheets on PCBs which, prior to 1977, did not warn readers of the known health and environmental hazards of PCBs.

Periodically, Defendants produced an inspection and maintenance guide for transformers and capacitors containing PCBs. Those guides did not warn readers of the known health and environmental hazards of PCBs, nor of congressional action against PCBs, nor of other countries restrictions on the use of PCBs. By 1975, PCBs had been banned in Great Britain and Canada, yet this information had not been provided to Nevada Power.

In 1970, Monsanto and Westinghouse knew that PCBs, if burned at temperatures less than 800 degrees centigrade, can partially oxidize PCBs into materials which can be highly toxic (eg. dioxins and furans.) Monsanto and Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In May of 1971, Monsanto was warned that it would be difficult to promote the sale of PCB related products in Japan without establishing a systematic strategy including not only presentation to customers of data explaining that products are free from pollution but also supply of such information as to degradation and disposal, yet this information was not imparted to Nevada Power.

Monsanto claims it learned PCBs were ubiquitous in the environment in 1966 or 1967. Yet, despite that knowledge, it increased its production of PCB products and expanded their production facilities, driven by a profit motive and at the expense to human health and the environment.

In 1972, General Electric maintained that over a nearly 40 year period the only adverse health effects experienced by U.S. workers exposed to PCB's were temporary skin lesions or irritations despite the fact that no systematic toxicity studies had been done throughout that period and PCBs had been found to be contaminated with furans.

Westinghouse believed Monsanto intended to protect their market share of PCBs for electrical apparatus usage due to the probable size and profitability of this market segment from Monsanto. Westinghouse saw it a matter of great concern and potentially bad enough to force them out of the Inerteen business would be the foregoing problems. Westinghouse then stated at best, they must institute a much, much tighter control over the usage and disposal of Inerteen. Finally, in 1970, Westinghouse admitted that it must consider communicating with its customers this information.

In July, 1956, Westinghouse asked for confirmation on information disseminated by Monsanto that an acceptable air concentration for Aroclor 1260, 1254 or 1242 would be three milligrams of Aroclor per meter of air.

In 1970, Monsanto gave advice on landfill disposal of Inerteen and Askarels and stated that landfills in which these substances are placed must not be located near water systems. They added that monitoring of rivers, creeks, lakes, etc., surrounding the fill, especially after heavy rainfall, will aid in assuring that PCBs were not escaping into the environment. In the same letter Monsanto admitted that Askarels cling to solids tenaciously.

In 1972, well after Monsanto and Westinghouse had begun discussing environmental pollution caused by PCBs, Monsanto sent out a warning advising customers to take every precaution to prevent entry of PCBs into the environment.

In 1934, Monsanto, or its predecessor, Swan Chemical Company, already knew that vapors of the Aroclors could cause irritation of the eyes and membranes of the nose and throat, and that adequate ventilation should be provided.

In 1934, Monsanto, through its predecessor in interest, Swann Chemical Company, knew that vapors of the Aroclors could cause irritation of the eyes and membranes of the nose and throat, and that adequate ventilation should be provided.

In 1954, Monsanto issued a handbook titled "The Proper Handling of Aroclors and Their Mixtures in the Electrical Industry". Chapter 9 of that book is the Dermatology and Toxicology section. Monsanto stated that in using skin patch tests of Aroclor 1254, no primary irritancy or sensitization was shown on the skin. Monsanto did recommend washing skin exposed to Aroclors with a soap and water solution. Monsanto stated that at ordinary temperatures Aroclors have not presented any industrial toxicological problems. They stated that if Aroclors are used at higher temperatures then exhaust fans should be installed. Monsanto did not give any other toxicity data in that publication and they stated that "the many years of satisfactory and safe use of Aroclors and their mixtures with chlorinated benzenes in the electrical industry for impregnating capacitors and filling transformers has demonstrated industry's ability to handle these fluids without hazard to the workmen. It is a simple matter and in line with good housekeeping to exercise suggested and required precautions". In light of what Monsanto knew, this is an insufficient warning.

In 1957, Monsanto's representations on the toxicity of Aroclors indicated that they had had no serious industrial health problems with the manufacture of Aroclors. Monsanto did state that ventilation should be provided if the Aroclor is heated to volatilization. Monsanto also stated that repeated or prolonged

skin contact should be avoided although there were few instances that they had had of skin irritation. Monsanto also cited human skin patch tests with Aroclor products that showed no irritation. This is contradictory to what Monsanto knew about the Aroclors and their toxicity by 1957. These were inadequate warnings and representations to the public and Nevada Power on the product.

In a July, 1964 revised standard operating instruction manual for Aroclors, Monsanto stated that chlorine gas used in the production of Aroclor is a very toxic corrosive gas. They also stated that chlorine gas used in the production of Aroclor is a very toxic corrosive gas. Monsanto also stated that biphenyl is a flammable material which will burn, and it recommended against inhalation of biphenyl fumes while they are burning. As for crude Aroclors, Monsanto stated that they can cause burns since they are hot but also that they contain HCL fumes which would be very irritating to the skin or the mucuous membranes. There is nothing on toxicity of any of these.

Monsanto offers labels indicating that chlorinated hydrocarbons are hazardous and the warnings state to avoid prolonged and repeated skin contact, but there are no indications on any of these labels as to when they were put into use or if they were ever used or how they were used. Merely by labelling prolonged skin contact as detrimental and to avoid breathing the vapors is an insufficient warning for the potential toxicity of these products.

In 1959, Monsanto's assistant medical director wrote in a letter that any prolonged and repeated skin contact with any of the Aroclors should be avoided for two reasons. The first reason was that the less chlorinated products are liquid and excellent solvents on the skin. The second reason is that prolonged or repeated skin contact could lead to chloracne. In that same paragraph he admitted that they had had cases of chloracne at one of their plants. He also admitted to a second incidence of chloracne outbreak in which workmen were dipping their hands into the Aroclor oil.

In 1963, Monsanto represented that Askarel had been made, handled and used for over thirty years without causing any toxic or ill effects. Monsanto also stated that it could be handled with minor precautions and that if accidentally spilled, no serious skin irritation would occur. This is a deliberate misrepresentation designed to induce reliance by Nevada Power and others similarly situated into using the Askarel products.

In 1969, Monsanto represented that PCBs were not broadcast or spread around the land as pesticides. Monsanto also represented that PCBs are stable chemical compounds which are insoluble in water; therefore, their use did not make them easily released into the natural environment. This is a direct conflict with what Monsanto knew at that point in time as to the uses of PCBs in the

U.S. and in other places. Monsanto also represented that during more than thirty years of U.S. production and use, cases of toxic effect have been rare -- and then only where simple precautions were not followed. This is in direct contradiction to other letters, memos and studies which have been produced in this litigation. Monsanto also represented that to their knowledge, PCBs are not sprayed or dusted on crops, woodlands, or any other areas, as pesticides. Monsanto also represented that it was inconceivable that elements identified as PCBs could be so widespread. These are all misrepresentations designed to get customers to rely upon Monsanto's representations.

In 1968, at a meeting of the corporate development committee, Monsanto made the decision to increase sales growth of Aroclors while maintaining domestic supply position and profitability. Monsanto made the decision to expand the transformer and heating systems uses of Aroclors and they set their target date as being 1972. With Therminol as an example, they decided to target ten to twenty million dollar business by 1972.

In a letter sent in 1969 to all customers of Monsanto it again repeated its claims that PCBs are not hazardous, that it was inconceivable that they should be spread through the environment as widely as the scientists claimed, and they emphasized only the closed uses of PCBs, not mentioning any of the pesticides, paint or other plasticizer uses for which it had been employed. This letter sent to its customers was designed to induce reliance by those customers upon Aroclor products.

In 1969, Monsanto was discussing the foreseeability that they would need to totally control all production and applications of Aroclors. In 1969, they were able to foresee that this would be a key to their future operations and productions of Aroclors. They also admitted that they were using reclaimed Aroclor into new Pydraul hydraulic fluid. Monsanto also noted that Westinghouse, rather than disposing of its capacitors entirely, preferred to drain the capacitors, and salvage the metal and other parts of the capacitors.

In a sworn, notarized statement made in 1974 to the state of Missouri, Monsanto's Manager, Product Acceptability for Functional Products, stated that Missouri's proposed effluent standards were unwarranted, economically unattainable and were based on inadequate toxicity information. Monsanto's representative stated that normal industrial hygiene practices are sufficient for handling PCBs. Despite data to the contrary, Monsanto's representative claimed that PCB use is less than one-half of what it was in 1971, and that the mere presence of PCBs in environment should not imply adverse effects.

Domestic sales and export records reflect tons of biphenyls sold between 1960 and 1971 for closed systems, heat transfer systems, hydraulics and plasticizers even though Monsanto knew of environmental and health dangers from production and use of PCBs at the very latest, by 1966.

In 1972, Monsanto and General Electric executed an indemnity agreement thereby amending all existing contracts for the sale of PCBs by Monsanto.

In 1974, Westinghouse and General Electric both sought to influence governmental decisions on TSCA and the FWPCA relating to polychlorinated biphenyls and regulation of that substance. The defendants sought to couch their objections in economic terms such as job or economic loss to communities and workers if PCBs were phased out.

Westinghouse and General Electric sought to influence governmental agencies by issuing a chronology of PCB cleanup and testing events which began with the year 1970. This chronology was intended by them to induce reliance by the government on their material misrepresentations regarding their actions involving the PCB market.

In February of 1971, Westinghouse, Monsanto and General Electric were meeting on behalf of the proposed ANSI Committee on Askarel Used in Electrical Equipment. A portion of that meeting included an update by Monsanto on the status of a Massachusetts PCB bill.

In a presentation given in 1976, Westinghouse represented that Aroclor 1242 for transformers was chosen as a replacement for Aroclor 1254 in 1968 because of its higher biodegradability. Westinghouse stated that Aroclor 1016, which it began to use in 1972, was more biodegradable than 1242.

In response to an inquiry from a customer regarding employee complaints about fumes and skin contact with transformer Inerteen in December of 1958, Westinghouse reported that they did not have significant problems with chloracne when its employees came in contact with transformer oil, and that workers should avoid breathing fumes only when the material was heated. Westinghouse represented that fumes at room temperature would not be sufficient to cause any problems.

In its Instructions for Handling Inerteen Insulating Fluid, in 1971, Westinghouse represented that Inerteen is generally regarded as being non-toxic to humans. Yet, in separate safety precautions section, they noted that Inerteen is highly toxic if taken internally and that swallowing an ounce or two could cause irritation of the digestive tract and internal reactions. The instructions warn that workers handling Inerteen should wash their

hands often and that if Inerteen is spilled on their clothes, they should remove it as soon as possible and launder it before wearing it again. In 1972, they also gave instructions on disposal of scrap Inerteen which were inconsistent with representations that there is not much of an environmental problem with Inerteen.

By a November, 1968 memo, Westinghouse Bloomington's Supervisor of Manufacturing and Planning admitted that the plant's disposal practices for scrap Inerteen were unacceptable. He also admitted that prior to an upcoming state health inspection the plant should stop dumping Inerteen into storm and sewage sewers and that all personnel in the areas where Inerteen is used should be issued proper protective clothing.

Under cover of a January, 1971 memo, Westinghouse distributed a copy of Askarel data regarding PCB pollution supplied by Monsanto. In the cover memo, Westinghouse stated that it was urgent that any escape routes of PCBs from their plants be eliminated. Monsanto admitted that based on its data, the principal cause of concern regarding PCBs is that they are very stable and resistant to degradation and that there could be a considerable increase of concentrations of PCBs in nature. Monsanto admitted that continued accumulation of persistent compounds like PCBs cannot be allowed, and means must be found to check the increasing pollution in the environment. Monsanto continued by saying that "positive effort must be made to control and prevent pollution by PCBs, and the that the highest priority should be given to preventing pollution of sewers and waterways." As for disposal, Monsanto recommended that Askarel wastes never be placed deliberately down effluent drains or sewers and utmost care must be exercised to prevent this happening accidentally. As for incineration, a closed system for incineration at 800 degrees or higher was recommended, and not landfill disposal, except for short term storage.

In 1968, Westinghouse represented, on the advice of Monsanto, that phosgene gas was not a product of combustion of Inerteen.

In July of 1972, Westinghouse began to issue "Hold Harmless" agreements to customers other than Nevada Power and required that they sign them before any more Inerteen would be sold to them.

In August of 1975, Westinghouse was not forthcoming on information about its PCB equipment. It instructed all marketing personnel to not answer any questions about Inerteen or PCBs, even if they knew the answer. All inquiries should be directed to John Brittain or Don McClain.

In 1976, Westinghouse represented that in 1968 it had determined that a mixture of PCBs such as Aroclor 1242 would be satisfactory as Inerteen for transformers. When they realized the environmental problems, they began to use Aroclor 1016 which they maintained as being more biodegradable. Westinghouse also stated it would be a

disaster for customers who would have to replace equipment prematurely. However, in that same vein, there was no mention of impending regulation regarding PCBs and the potential liability which would be imposed on customers by those regulations. This is a clear attempt by the manufacturer to continue fostering reliance by its consumers on Inerteen.

Westinghouse's yearly sales totals for all PCB products are listed as increasing to a high point in 1967 and 1968 when ten million pounds of PCB products were sold. Between 1971 and 1974, Westinghouse increased its production of PCB products. Westinghouse knew of the potential dangers and hazards of Inerteen well before 1974, and yet it increased sales without providing adequate warnings to Nevada Power.

In November of 1976, Westinghouse notified its customers that as a result of recent investigations, they had determined that some oil filled transformers actually contained varying concentrations of PCBs. Westinghouse went on to state that customers should check all oil filled transformers for the presence of PCBs. Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In the early 1970s, Monsanto communicated verbally to Westinghouse that there were no injuries or risk of harmful effects to workers exposed to PCBs.

In 1970, despite evidence of other adverse health effects, General Electric told McGraw Edison that PCBs "have produced no ill effect on workmen in close contact with them except for temporary skin irritation in certain individuals."

In 1970, General Electric promoted Monsanto's services to its utility customers for disposal of PCB waste. General Electric expressed an intent to continue using askarels despite the acknowledged problem of environmental contamination.

During the early 1960s, Monsanto and Westinghouse exchanged information on proper ventilation and industrial hygiene practices when working with Inerteen. The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1981, Nevada Power conducted a meeting regarding a spill of PCBs on private land. At that time, Nevada Power honestly reported what it believed to be the truth about PCBs, based upon false information it received from defendants and upon information given to agencies by the defendants:

"You are probably most interested in the health effects on people. First let me say there has been no national deaths due to exposure of PCBs. Only a few medical problems have occurred to workers who work with the material daily, such as

in manufacturing plants or workers in transformer repair shops. The problems occurred with the workers due to repeated and direct contact with the material daily - it may cause minor skin conditions with direct contact such as red sores (like poison ivy, it can cause a rash if you are skin sensitive), acne, drying or cracking of the skin. If workers are in confined spaces or areas not well ventilated, it may cause throat and respiratory irritations and headaches."

Nevada Power utilized ANSI and IEEE standards in developing specifications for utility equipment.

During the period when Nevada Power was changing out equipment, it had no reason to suspect it had been lied to.

In the early 1980s, Nevada Power conducted an extensive "betterment project" to determine the best procedure for dealing with each type of equipment which contained PCBs.

Nevada Power personnel learned about PCBs in 1975 or '76 from trade magazines, but did not consider them a problem requiring immediate action.

Nevada Power personnel learned about PCBs in 1975 or '76 from trade magazines, but did not consider them a problem requiring immediate action.

In 1968, the Chief of the Industrial Waste Disposal section at the Indiana division of water pollution control wrote to the trash hauler for the Westinghouse Bloomington plant and told him that by burning the Westinghouse Inerteen contaminated scraps he could be producing some very toxic gases such as phosgene. He also indicated that Westinghouse representatives felt that burial should be the preferred disposal method for these substances. At this point in time, Westinghouse already knew, via Monsanto, that PCBs cling "tenaciously" to soil.

In February, 1989, Westinghouse represented to Nevada Power that sales of transformers with PCBs were phased out in December 1976. With respect to the phase out of capacitors, the last capacitor containing PCBs was out of production by April of 1978.

In 1976, Congress enacted the Toxic Substances Control Act. PCBs are the only chemical which the congress ever regulated under this act. The Act was passed because of the hazards to human health and the environment from exposure to PCBs.

PCBs are found throughout the environment, in human adipose tissue, in human breast milk, in human fetuses, in chickens, eggs, fish, all animals in the human food chain, and is bioaccumulating and biomagnifying in the environment.

Nevada Power transformers and capacitors failed and released PCBs to the environment.

In 1979, EPA issued an alert for food and feed facilities warning of the dangers of PCBs in such facilities and warning that PCBs were entering the human food chain.

As of May, 1973 public carriers of PCB filled equipment were not properly instructed by General Electric or Monsanto on emergency clean up procedures to protect the environment and workers.

In 1973 General Electric misled EPA in its comments on the proposed effluent standards for PCBs. GE represented to the agency that PCBs are not highly toxic, Aroclor 1016 should not be classified as a toxic pollutant, background levels of PCBs from older manufacturing plants should not be considered in setting and monitoring effluent standards, levels of PCBs in the environment are decreasing, and the EPA's .002 ppb effluent standard for PCB was impossible to meet.

In 1974, Monsanto was actively coordinating industry activity to persuade EPA to modify proposed PCB effluent standard.

Nevada Power may be subjected to liability for money damages to employees and customers that come into contact with, and are injured by, Nevada Power equipment containing PCBs, whether or not the amount of PCB is more or less than 50 ppm.

Nevada Power is studying the feasibility of an active program to identify transformers which contain PCBs and replace those transformers with any detectable amount of PCBs.

There were no efficiency gains in either transformers or capacitors as a result of the PCB changeouts.

There were no efficiency gains in either transformers or capacitors as a result of the PCB changeouts.

There is no market value for used PCB capacitors.

PCB transformers were not retrofilled. They were a potential liability and Nevada Power received nothing for them when they were taken out of service. There was too much risk of liability for future users and leaks.

Nevada Power considers transformers with even small amounts of PCBs to be PCB contaminated as far as salvage value was concerned because of the risk of liability.

Westinghouse salespeople do not recall anyone in Westinghouse responsible for advising utility customers about potential harm from their equipment to the environment or human health.

In January of 1972, Monsanto wrote to GE and informed them that PCBs are not readily biodegradable and that they may be considered environmental contaminants and may adversely affect some species of animals and marine life. This information was not provided to Nevada Power.

GE began testing mineral oil for PCB contamination in the 1960s, possibly as early as 1960.

Representatives of General Electric met with assistants from the office of the governor of the State of Indiana to express concern over notice of a NIOSH and State Board of Health report prepared by Dr. Tom Sinks and Dr. Greg Steele in 1991 regarding a mortality study conducted on workers at the Bloomington Westinghouse plant. A State of Indiana press release stated that the study indicated that Westinghouse PCB workers had a four-fold risk of dying from malignant melanoma. During a meeting with the Governor's assistants, Steve Hamilton told them that GE "had a problem with the way the analysis had been done" and there were concerns with the study. He told the assistants that a similar study on GE workers showed results totally inconsistent with the Bloomington study. Mr. Hamilton also told them that they should not make further announcements regarding the study that he considered flawed.

In 1976, Monsanto internally recognized that it had been lucky that it had not been publicly linked with PCBs.

Defendant Westinghouse engaged in a deliberate attempt to destroy what it termed "smoking gun" documents from its files relating to toxic substances in an effort to avoid liability from lawsuits relating to toxic substances, specifically including PCBs, dioxins, and furans.

Around 1987, Westinghouse attorneys went through Westinghouse offices, plants, and buildings and removed all material relating to PCBs and to Monsanto. Most of that material was never returned.

In 1967, Monsanto suggested to Westinghouse that they put a warning on their products containing PCBs. Westinghouse did so much later.

During the early 1960s, Westinghouse did not inform foremen in charge of PCB workers that Inerteen is a fairly toxic material which must be handled in such a way as to prevent poisoning.

Between 1949 and 1985, Westinghouse sales engineers did not warn customers about environmental risks caused by PCBs.

In the late 1970s and early 1980s, documents were gathered from engineering and sent to Westinghouse's law department. In addition, people from the legal department came to the Bloomington plant and collected documents from the files on PCBs.

Even after researchers reported to Westinghouse's management in the early 1970s that the levels of PCBs outside the Bloomington Plant could endanger humans and the environment, Westinghouse concealed this information from the public.

In 1984 or 1985, Westinghouse's legal department gathered files relating to PCBs. Not all of the files were returned to the people or departments which provided them. It was understood by Westinghouse employees that this collection of documents was done in anticipation of or preparation for litigation.

In 1975, Westinghouse informed its employees that they were not to answer any questions regarding Inerteen "even if [they knew] the answer."

In December of 1976, D. Fabbi was safety director for Nevada Power. He wrote a memorandum re: Capacitor Grade Askarel/ Product Safety Data to Nevada Power employees which reviewed a recent report from the National Electrical Manufacturer's Association regarding askarel. Mr. Fabbi's report stated his belief, based upon information available to him through NEMA, GE, Monsanto, and Westinghouse, that "Askarel contains a chemical termed Polychlorinated Biphenyls that some studies have shown to be an environmental contaminant. The report indicates that 'medical records over a nearly forty-year period show that the only adverse health effects experienced by U.S. workers exposed to askarels, either during the manufacture of these liquids or of electrical equipment containing these liquids, have been limited to occasional cases of non-chronic chloracne or other temporary skin lesions or irritations.'"

All of the facts contained in Plaintiff's EXHIBIT 2. This exhibit is too voluminous to summarize and contains multiple facts, all of which Plaintiff relies upon in support of its causes of action. Nevada Power points specifically, however, to the following facts, without waiving the right to rely upon any of the other facts contained in this exhibit:

- a. Based upon knowledge available for forty years prior to the Defendants, NIOSH in 1976 recommended labeling that stated:

POLYCHLORINATED BIPHENYLS  
(PCBs)

DANGER! CONTAINS POLYCHLORINATED BIPHENYLS  
CANCER SUSPECT AGENT

- b. NIOSH, after a review of data and consultations with others, formalized a system for the development of criteria upon which standards could be established to protect the

health and to provide for the safety of employees exposed to hazardous chemicals and physical agents, including PCBs. It developed standards for worker exposure to PCBs based upon information available to it.

c. NIOSH reported that evidence indicates adverse reproductive and tumorigenic effects in experimental animals exposed to certain commercial PCB preparations.

d. NIOSH recommended medical surveillance for employees exposed to PCBs.

e. NIOSH recommended that workers ensure that they not come into contact with PCBs by wearing protective clothing that was impervious to PCBs.

f. NIOSH recommended daily changes of clothing for workers exposed to PCBs, daily showering at the plant, new street clothes to be worn when leaving the plant - all precautions undertaken by defendants' employees, but not made known to Nevada Power and most other electrical utility companies.

g. PCBs are manufactured as aroclors and typically have four numbers. The second set of two numbers indicate the percentage by weight of chlorine in the mixtures.

h. Many commercial PCB products also contain polychlorinated dibenzofurans and naphthalenes.

i. Commercial preparation of PCBs in the US began in 1929 and reached 85 million pounds in 1970.

j. Imported PCBs were not used in dielectric fluids for transformers or capacitors but were used in semiclosed heat transfer applications.

k. Monsanto was the sole US producer and supplier of PCBs for dielectric fluids for use in transformers and capacitors.

l. The first report of lethal doses of PCBs was contained in a presentation made in 1930.

m. Health problems associated with the manufacture of PCBs were the subject of a report by Jones and Alden in 1936. Of 24 men working in the manufacturing process, 23 developed chloracne. The first indication of chloracne in workers appeared in January of 1933.

n. In 1936, Schwartz reported digestive disturbances, burning of the eyes, and impotence in men working with PCBs.

o. An early use of PCBs was for incorporation along with chloronaphthalenes into synthetic waxes, including halowax. These waxes contained 10-20% PCBs, the rest chlorinated naphthalenes. There were reports of workers developing chloracne when developing these waxes, and at least one death. The death was reported to begin with chloracne, followed by jaundice, distention, abdominal pains, and an autopsy showing cirrhosis of the liver.

p. PCBs have been found in milk and adipose tissue of women, hair samples, fetuses, and nearly everywhere - including in the human food chain.

q. Early reports of chloracne associated with PCBs indicated chloracne from exposure to a mixture of 10-20% PCB with

chlorinated naphthalenes. In 1936, Jones and Alden were the first to document chloracne just from PCBs.

r. Other effects associated with PCBs in early reports included digestive disturbances, eye irritation, liver injury, and impotence.

s. Three cases of severe chloracne from exposure to PCBs was reported in 1954. (In 1937, the Drinker report round table discussion indicated that systemic poisoning was likely in those individuals who developed chloracne)

t. Eight other instances of chloracne in workers exposed to PCBs was reported in 1962.

u. Severe chloracne was described in 1964 in 13 of 15 workers exposed to PCBs.

v. An additional report of severe chloracne in a worker exposed to PCBs was published in 1969.

w. GE reported in 1975 that its records showed skin rashes and dermatitis reported on 49 occasions during the prior 15 years. Associated with the complaints were itching of the face, neck, eyes, arms and hands. A generalized skin rash was the basis of 14 additional complaints. One worker developed a generalized rash on exposed parts of his body after only two days of working with PCBs.

x. The first indication in the literature that PCBs might be embryotoxic or have teratogenic effects was reported in 1963.

y. In the majority of studies where workers exposed to PCBs developed chloracne, they were also indications of liver injury. Liver injury was found in workers exposed to PCBs where the workers did not develop chloracne.

Defendants knew these facts before selling PCB laden transformers and capacitors to Nevada Power but did not disclose this information to Nevada Power.

When Nevada Power announced in 1977 that it was contacted by the US Environmental Protection Agency that PCBs represent a potential hazard to the environment and to human health, Nevada Power honestly reported its belief that "[t]he threat to the environment was only recently acknowledged. the (sic) danger arises from the chronic toxicity, their pervasiveness and persistence in the environment, and their tendency to accumulate in food chains." Nevada Power believed these effects were, in fact, "recently acknowledged" because Defendants did not inform Nevada Power of those facts.

PCBs were used in medical and dental applications.

PCBs were added to insecticides to extend the effectiveness of the chemicals. Knowing that PCBs were added to insecticides, Monsanto nonetheless informed the public and agencies that they did not know PCBs were used in pesticide formulations and that they did not know how PCBs were dispersed throughout the environment since they were not being dispersed as pesticides.

In the early 1980s, fires occurred in New York and California in buildings housing PCBs. Those fires resulted in the evacuation and, in the case of the New York fire, long-term abandonment of the buildings because of the potential harm to human health from exposure to PCBs, and to the byproducts resulting from oxidation and combustion of PCBs (polychlorinated dibenzofurans and/or chlorinated dibenzodioxins) and tetrachlorobenzenes deliberately mixed with them by defendants.

Monsanto was the sole producer and supplier of PCB containing dielectric fluid in the United States.

The EPA has published various notices in the Federal Register outlining the hazards of PCBs, and proposing and requiring limits and restrictions on the use, application, disposal and manufacture of this chemical.

In 1982, the Occupational Safety and Health Review Commission ruled that there is a substantial probability that death or serious physical harm could result from the short and long-term effects of PCB exposure.

Westinghouse employees brought suit alleging injury from exposure to PCBs and Monsanto employee(s) were deposed in that lawsuit.

Dr. Kelley, Monsanto's medical department director, never informed Mr. Benignus of the round table discussion following presentation of the Drinker report in 1937.

Benignus knows now that PCB vapors are toxic to the liver and kidneys.

Between the years 1954 and 1977, General Electric sold over 275 million pounds of PCBs. Peak production years were 1965 through 1970, and 1972 through 1975. Production increased in the early 1970's - precisely the years when the manufacturers in this litigation claim they were scaling back production due to environmental concerns.

By 1973 General Electric was working on developing alternatives for PCBs in electrical applications.

By 1969 General Electric knew that pyranol persisted in the environment with potential adverse effects. However, the industrial hygiene department did not take immediate action to notify customers or determine whether its own plants discharged PCBs into the surrounding environment.

Monsanto's Benignus had not heard of any reports that PCBs caused skin irritation until the Westinghouse lawsuit.

In a letter from NEMA to ANSI in 1970, Monsanto recommended itself as co-secretariat along with NEMA to develop the guidelines on use and maintenance of Askarels and their disposal procedures. They further recommended that they help develop recommendations to interested international standards bodies such as the IEC and CIGRE. They proposed that they assume a role in the leadership of promulgation of guides and procedures as well as the dissemination of all information to interested consumers of PCBs.

In 1971, NEMA and Monsanto kept close track of governmental actions and recommendations regarding PCBs, with particular interest in the actions of Congressman Ryan from New York and foreign countries' regulation of PCBs.

In 1975, NEMA made efforts to ensure that all representatives of member companies in the capacitor and transformer sections of the ANSI C-107 Committee were well represented at EPA conferences covering polychlorinated biphenyls.

In 1976, Monsanto, Westinghouse and General Electric sought to influence the government's position on PCBs by providing information through NEMA.

In an internal memo from April of 1970, after a meeting with Monsanto, Westinghouse admitted that PCBs are now in the general environment and in many (if not all) parts of the world in sufficient quantity that nature, through various concentrating phenomena, can make them highly toxic, if not lethal, to certain forms of animal life. Westinghouse then stated that no proof exists of PCBs toxicity to humans at its present levels of concentration. However, Westinghouse stated that "it was almost certain" that the Food and Drug Administration would be issuing maximum allowable levels in foods for human consumption in the near future.

It was not until 1970, that Monsanto and Westinghouse worked together to develop PCB warning labels.

In a September 22, 1977 letter, Monsanto asked Westinghouse to purge all of its latest Askarel Handling, Inspection and Maintenance Guides from Westinghouse's possession. This was after Monsanto had made the decision to withdraw as a supplier of PCB dielectrics. Monsanto did not want any customers to rely on the information in those handling guides, because of potential liability which might arise from representations in the guides.

On a Material Safety Data Sheet dated 1980, Monsanto stated that Inerteen or Askarels can be absorbed through intact skin. There is information in which Monsanto admits that PCBs can impair the reproduction function in monkeys; can cause severe liver cancers, and that the consistent finding is that PCBs produce liver injury following prolonged and repeated exposure by any route. As for

fire and explosion information, it merely states that fire fighting equipment, including respirators and clothing, need to be decontaminated before being worn again. The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

From 1957 through 1978, Monsanto steadily increased its sales of PCBs and their manufacture until approximately 1977 when all PCBs manufactured were discontinued and all production for that year is zero. Most importantly, Aroclor/Askarel sales increased during the early 1970's, and Monsanto expanded production at its Anniston, Alabama plant precisely during the years when it represented that it was searching for ways in which to eliminate PCBs escaping into the environment.

In May of 1987, Westinghouse sued its insurers to recover liability payments it had to make as a result of cleanup efforts for hazardous wastes with which it had polluted various dumps and pieces of land in New Jersey.

In 1972, Monsanto warned Westinghouse that it should take every precaution to prevent any entry of PCBs into the atmosphere and it should not be used by them or by their customers in equipment packaging materials involving food or pharmaceuticals. Monsanto and Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved. Since early 1970, Monsanto had notified Westinghouse that PCBs are highly stable chemical compounds and not readily biodegradable. When placed in the environment, they may be considered contaminants and adversely affect marine life."

In February of 1972, Monsanto issued a form letter to customers advising them that Monsanto would be discontinuing direct sales of Aroclor, Inerteen, Pyranol. Monsanto admitted that studies have indicated PCBs may be accumulating in the environment. For future requirements of dielectric fluids, they suggest that customers contact the manufacturer of the transformer for which they desire the fluid.

By March of 1972, Monsanto knew that Japan would ban production and manufacture of PCBs. Monsanto failed to timely warn its customers of impending regulations and bans on PCB usage and production and did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Monsanto paid Dr. Paul Wright's legal fees for his criminal defense in the case United States v. Urdahl. The legal fees were paid up through April 9, 1992, the date of the post trial appeal. The payments were made to the law firm, Wilmer, Cutler & Pickering.

Between 1966 and 1975, it was standard procedure for the medical department at Monsanto to peruse journals, magazines,

bibliographies, literary references, and studies regarding PCBs. This information was kept in the medical library organized by product name. The journals in Monsanto's library date back to 1930.

In 1972, a representative from Westinghouse served as chairman and presiding officer of the Technical Committee on Capacitors Section of NEMA and, in that capacity, was in a position to influence NEMA in its position regarding capacitors.

In 1972, Westinghouse, through its placement of employees on the NEMA Technical Committee Capacitor Section, kept abreast of PCB regulation in foreign countries, including legislation in Sweden for the use of PCB.

In 1978, Westinghouse sought to rescind NEMA and ANSI's previous recommendations as to handling and disposal of Askarel fluids, as propounded in 1974.

By April of 1972, Westinghouse acknowledged that it would be responsible for any spilled Inerteen fluids sent to any dump by Westinghouse.

In 1970, Westinghouse admitted that procedures for scrap handling and disposal of hazardous waste, most noticeably Inerteen, are being completely disregarded by almost every manufacturing section. Westinghouse also stated that such disregard of their specs will cause injury to personnel handling the wastes and that those wastes could end up at a local dump where they would be found and result in legal action against Westinghouse.

In a 1970 meeting with NEMA, Westinghouse stated that the PCB problem of environmental contamination was not only a manufacturing industry problem, also NEMA, the National Electrical Manufacturers Association, should not establish guides or standards in regard to askarels. Despite evidence to the contrary, Westinghouse and NEMA indicated that there was no evidence to indicate that the material would be harmful to humans. This is in direct contradiction to studies which Westinghouse had at its disposal. Westinghouse, along with the NEMA committee, decided that Monsanto had done an adequate job in advising manufacturers to exert precautions in handling PCBs. Westinghouse and NEMA also admitted that users must weigh and evaluate hazards of an oil explosion and resultant potential injury to persons as compared to a possible injury to the human race by PCBs. They felt that there was no evidence that any injury would result from PCBs. Westinghouse's misrepresentation as to the state of scientific knowledge is an example of how Westinghouse (along with the other defendants) sought to influence the decisions of various trade associations.

Even in the early 1970s, the engineering department of Westinghouse told employees that PCBs were not hazardous to human health and that Westinghouse had never experienced a problem with PCBs.

Westinghouse's own sales engineers did not always read all of the instruction books they received.

Approximately 2-3% of Westinghouse's PCB capacitors failed during testing. When capacitors ruptured on the merry-go-round final capacitor test, there would be a loud bang and smoke. Merry-go-round failure would occur up to twice a month.

In an average month, Westinghouse made 6000 capacitors of all types. About 180 would fail during testing.

In the 1980s, Westinghouse began a PCB training program to certify workers. The training consisted of requirements for compliance with federal regulations, marketing, record keeping, handling, storage, and personal protection. Various degrees of protection were required depending on the amount of contact with the Inerteen. Recommended protective clothing included paper suits, and coverage over shoes and gloves. Respirators were required for people actually draining and refilling transformers.

Westinghouse negotiated with Monsanto over the terms of Monsanto's indemnification agreement sometime between 1970 and 1972. The motivation for Monsanto to get an indemnification agreement was that Monsanto was concerned about possible claims of injuries to organisms and was reluctant to sell PCBs. During negotiations, Westinghouse's in-house counsel did not investigate claims that PCBs were hazardous to humans and the environment and did not request of Monsanto any information about PCBs.

By 1951, Westinghouse was conducting studies at their Pittsburg lab on PCBs to evaluate them for various applications and how they should be processed for capacitors. The lab workers were instructed to avoid breathing vapors, and keep the room well ventilated. The workers were provided with Safety Practice Data Sheets.

When customers reported PCB leaks, Westinghouse's service managers did not provide them with advice on health hazards regarding PCBs.

Monsanto contributed written information and data for Westinghouse's report, "A Status Report on Chlorinated Diphenyls, Regarding Environmental Pollution" dated December 27, 1971. Tables 1, 2, 3, and 4 were prepared by Monsanto.

The first load of aroclor went out of Monsanto's Anniston, Alabama plant to GE in 1931. Since then, the market grew to be one of Monsanto's most profitable franchises.

Monsanto knew that its corporate response to the PCB problem would expose them to continued adverse publicity and possible law suits.

The GE Company purchased its chlorinated polyphenyls from Monsanto, modified it, and used it under the name Pyranol. .

Monsanto's Corporate Management Plan for the PCB environmental problem had this objective: to manage the PCB pollution problem to prevent it from adversely affecting the established Return-on-Investment objectives of the Functional Fluids and Plasticizers Group, while maintaining the corporate image of Monsanto as a responsible and respected member of industry worldwide.

From 1930 to 1977, when PCB manufacture ceased in the U.S., about 1.4 BILLION pounds of PCBs were produced.

In November of 1971, Monsanto wrote to GE about conditions in Great Britain and said there is no government ban on PCBs, nor did Monsanto expect one.

Monsanto was the sole domestic supplier of PCBs.

In 1972, GE sent a memorandum to its field sales managers and field sales engineers indicating that, despite the information then available on PCBs, GE would continue to provide Pyranol transformers. Nevada Power believed PCBs would continued to be provided to it in transformers and capacitors.

GE and Westinghouse sought indemnification agreements from their customers for harm caused by PCBs.

Monsanto has corporate policies to use safe products and to inform customers of the hazards of Monsanto products which it has violated relating to PCBs and Nevada Power.

All facts contained in Plaintiff's Exhibit 1104, which is too voluminous to reproduce in this document.

All of the facts contained in Plaintiff's exhibit 1606 which is too voluminous to include in this interrogatory response.

In 1975, Dr. Calandra expressed concern over Dr. Kimbrough's findings that PCBs cause liver carcinomas. Dr. Calandra offered assistance in pathology and contacting federal agencies to show the disparity between these results and IBT's own studies. He also noted that IBT and Monsanto were able to counteract an earlier allegation by Dr. Kimbrough that bladder cancers developed in rats fed PCBs. He admitted to having no basis for refuting Dr. Kimbrough's liver studies.

In the 1950s and earlier, Monsanto subcontracted to Industrial Bio-Test Labs for ninety-day feeding studies and chronic lifetime feeding studies on PCBs fed to animals.

Between 1971 and 1974 Industrial Bio-Test conducted studies on chemicals, including studies for Monsanto Company. Former laboratory researchers at IBT have testified that lab animals escaped from cages, were unaccounted for, were left decaying in their cages to the point necropsy was impossible, and new animals were substituted in for dead or missing animals. In addition, the temperature and humidity in the "swamp" where the animals were kept were not controlled and varied widely. The weighing machine, which is a critical part of toxicology studies, operated with questionable accuracy.

Monsanto employed Dr. Drinker to conduct tests on PCBs.

Nevada Power first became aware of health and safety issues associated with PCBs in their electrical equipment in 1979 when EPA's regulations were announced.

The training received by the worldwide sales representatives for PCBs were trained by business people, including Paul Benignus who, in turn, never reviewed the medical literature on the hazards of PCBs, and who had never known or seen the 1937 Drinker study documenting adverse human health effects from exposure to PCBs.

No sales people working for Defendants who sold PCB laden electrical equipment to Nevada Power believed when they sold this equipment to Nevada Power that PCBs cause harm to human health or to the environment, nor did they receive any training or information on the real or potential hazards of PCBs to human health and to the environment, nor did they inform Nevada Power that PCBs were alleged to cause harm to human health or to the environment, nor did they tell Nevada Power that PCBs get absorbed through the skin, nor did they inform Nevada Power of the special precautions taken by defendants' employees who were exposed to PCBs as part of their employment.

In 1993, Monsanto's former worldwide manager for PCBs did not know whether PCBs enter the body through the skin, based upon conversations he had with personnel within Monsanto, including representatives of its medical department.

Only after 1966, when researchers found PCBs to be present in the environment, did Monsanto conduct a review of literature on PCBs which reported earlier claims of chloracne and similar symptoms in the thirties and forties, but which subsequent medical information certainly did not relate specifically to PCBs.

Prior to March 18, 1970, Monsanto admitted that all customers using dielectric fluids containing PCBs had not been officially notified about known effects, nor did Monsanto labels carry information about known effects.

Pathologic changes in animals exposed to a commercial chlorinated diphenyl were reported as early as 1944, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

The toxicity of the vapors of Aroclor 1242 and 1254 were documented as early as 1956, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Ninety-nine percent of Americans are reported to have over 500 ppm PCBs in their adipose tissue, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

PCBs biomagnify in the human food chain, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

PCBs can work synergistically with other compounds to impair the immune system, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

It was known by 1947 that chronic poisoning could occur with repeated exposures to sufficient concentrations of PCB vapors, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Monsanto determined that periodic medical examinations should be conducted for its employees who were exposed to PCBs, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1955, workers exposed to PCBs experienced chloracne, gastric troubles, and liver troubles, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1975, Monsanto's manager for dielectric fluids containing PCBs believed that the only adverse affect to human health or the environment from introduction of PCBs to the environment was the presence of PCBs and their biomagnification in the food chain.

By 1970, Monsanto knew that PCBs would vaporize if it reached heated temperatures less than 1600 degrees fahrenheit.

Monsanto made the corporate decision to address the PCB problem through ANSI. The defendants controlled ANSI and their publications through their membership in the ANSI committees created to address this problem.

In 1975, PCBs were found in fish from Lake Michigan that exceeded the limits established by the Food and Drug Administration, which caused substantial concern to the EPA and the states surrounding this lake.

In 1971, Great Britain ceased sales of PCBs to non-controllable uses for PCBs, yet Defendants did not impart this information.

In February of 1971, Monsanto was losing 30 pounds of PCB per day in its manufacturing process and lost nearly six pounds per day in March of 1971 .

On December 28, 1971, Westinghouse research director of power systems, G.W. Wiener, wrote minutes of a PCB status meeting that occurred that date. The meeting was held, in part, "to define a possible position for Westinghouse in the use of [PCBs]." Westinghouse admitted it knew, on that date, that:

- a. the biological activity of PCBs was at best poorly defined;
- b. the higher chlorinated biphenyls appear to concentrate in the fatty tissue and in the liver of fish, birds, and some animals;
- c. the toxicity of PCBs in any absolute terms cannot be expressed, but there is some indication that the lower chlorinated biphenyls (3 ppm or less) appear to be more toxic than the higher chlorinated biphenyls;
- d. with respect to birds and, in particular, leghorn chickens, the reproductive cycle is adversely affected by the presence of PCBs. Specifically, the hatchability of the eggs is reduced;
- e. Westinghouse had no analytical data either from Monsanto or elsewhere that the PCBs used by Westinghouse did, or did not, contain polychlorinated dibenzofurans;
- f. Many species of animals and fish contain 1 ppm or more PCBs in their tissues;
- g. there is sufficient evidence that PCBs can be deleterious to the health of animal and human life;
- i. the risks of ignoring evidence that does exist that PCBs can be deleterious to the health of animal and human life was inappropriate for Westinghouse;
- j. The biodegradability of PCBs may, as of December 28, 1971, be of a secondary issue because there was so much PCB in dumps, in the ground, in the river and ocean beds, that unless steps are taken to reduce the source of PCB contamination, the burden in the environment will have no chance of decreasing;

k. If PCBs are biodegradable with a relatively long half-life, unless the source of PCB pollution is stopped, "we will not be able to rid the environment of PCBs."

There, Westinghouse proposed to, among other things:

a. "Notify all of [its] customers about the nature of PCBs, the hazards associated with them, and provide them with instructions for disposal of units containing these materials."

b. Instruct all of Westinghouse's customers to return failed or non-serviceable PCB units to Westinghouse so that the PCB in the unit could be disposed of adequately.

Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1973, it was known that PCBs sold by Defendants contained polychlorinated dibenzofurans, a deadly chemical impurity, yet defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Defendants attempted to influence congressional action relating to PCBs by preparing talks and papers that were not candid regarding known or suspected affects of PCBs on human health or the environment.

Monsanto increased sales of PCBs from 1960 to 1971, with 1967 - 1970 being the years of greatest production.

All of the facts contained in Plaintiff's exhibits 1509 and 1510, which are voluminous and a recitation of the facts, are hereby incorporated as contentions.

Defendants knew well before 1977 that PCBs would no longer be manufactured for use, yet defendants did not impart this information to Nevada Power.

Defendants knew that congressional action was taken in 1970 to restrict or eliminate the use of PCBs, and that similar action was taken in subsequent years, but defendants did not impart that information to Nevada Power.

In January of 1970, Monsanto had unsurpassed sophisticated capability to detect PCBs in the ppm range.

In January of 1970, Monsanto was asking its customers to accept liability for any damages caused by the PCBs it was manufacturing and selling.

Monsanto attempted to influence information relating to the health and environmental problems of PCBs, through the development of industry standards, by proposing and arranging that they be co-chairs of the industry group establishing the new standards. When that failed, they simply placed their personnel in charge of the

new committee and arranged the placement of GE and Westinghouse personnel, and other industry representatives, on the primary committee addressing these new standards.

In April of 1970, Monsanto and Westinghouse engaged in a meeting "to investigate the ecological problems of PCBs and how these problems would affect the electrical industry." At that time, these defendants admitted that PCBs had been found in various river systems, the fatty tissues of fish, birds, eggs, milk of cows and humans. A conclusion was reached that the use of PCBs must be tightly controlled "in order to protect the electrical industry from law suits...."

In October of 1972, Westinghouse admitted its warnings (precautionary statements) on PCB products on labels, nameplates, data sheets, instruction manuals, etc., "do not fully meet the requirements of the Federal Occupational Safety and Health Act...."

Monsanto double-charged for PCBs by initially billing for the product, then charging to have it returned.

In 1968, defendant Monsanto learned that a researcher named Riseborough found PCBs in a number of species of fish and birds along with California coast as well as in waters off Baja California and Central America.

Replacements for PCBs were available but were not developed because of the financial benefit to Defendants from the sale of PCBs.

Federal regulations and laws define the uses, characteristics, and hazards of PCBs.

PCBs are believed to have a biomagnification level of 200,000.

In October of 1971, GE and Westinghouse knew that Monsanto did not claim MCS 1016 was biodegradable and that Monsanto specifically requested that no claim be made that MCS 1016 was biodegradable, yet claims were made publicly that 1016 was biodegradable. .

In response to a complaint about PCBs and their possible environmental contamination, Westinghouse in June of 1970 proposed a precautionary label which stated only that "some studies have shown [PCBs] to be an environmental contaminant" and recommended prevention of entry of PCBs into the environment.

In 1976, Westinghouse prided itself on being identified with the PCB problem only in Indiana and issued a memorandum outlining potential questions and required answers to those questions, all relating to PCBs.

In 1956, Monsanto acknowledged that PCBs cause chloracne but gave misleading information by stating that no chloracne had been found in the electrical industry's use of PCBs.

In April of 1972, Westinghouse acknowledged it had a need to "establish a program for notifying customers of hazards [of PCBs] and [the] need for care in use and disposal, yet it did not do so, and should have done so much earlier based upon information available to it and known by it.

Westinghouse prepared the ANSI C-107 first draft of the "Capacitor Plant Housekeeping and Employee Safety" portion of the proposed ANSI C-107 standard on the use and disposal of PCBs.

In 1970, Defendants wrote letters purporting to be addressed to all of their customers of PCB products, but which was not sent to Nevada Power, and the purported purpose of the letter was to advise the customers of the environmental and health hazards of PCBs but the letter omitted material facts known by defendants about the environmental and health hazards of PCBs.

In 1970, Monsanto knew that MCS 1016 did not have biodegradation at a level that was statistically significant, yet they encouraged the claim that this PCB product was biodegradable.

Since 1969, Monsanto had a program to replace PCBs in dielectric fluids for transformers and capacitors, yet did not impart this information to Nevada Power.

In 1976, Monsanto reported internally that an epidemiology study of certain of its employees showed a statistically significant increase in lung cancer though an epidemiologist employed by it said the lung cancer was not caused by the PCBs .

GE and Monsanto discussed the presence of chlorodibenzofurans in PCBs in 1975.

In 1969, Monsanto developed a policy on PCBs to make the government, states, and Universities prove their case while avoiding as much confrontation as possible and indicated that adverse publicity and competition are the real weapons. It also admitted that it couldn't defend against all the accusations being made against PCBs since some animals or fish or insects will be harmed.

In October of 1970, Monsanto issued an internal status report on its performance against its PCB plan and indicated that it must continue to emphasize to all remaining users of PCBs the importance of preventing escape to the environment and that Monsanto must ensure that these warnings are fully documented so that they will support the action taken by Monsanto in this area should Monsanto become involved in legal actions.

Monsanto followed closely the success of its public relations regarding its manufacture of PCBs.

It was estimated in 1969 that 10 million pounds of PCBs annually may become environmental contaminants by their escape into the environment, yet this information was not given to Nevada Power.

Metcalf stated in 1969 that, because of the stability of PCBs, most of the PCB (estimated to be  $2 \times 10$  to the eighth power) which has escaped to the environment may still be circulating in the global ecosystem.

In 1970, Monsanto had a goal to determine the presence of dioxin and/or related toxic materials in PCB products.

In 1938, Dr. Von Oettingen wrote an article on the toxicity and potential dangers of Inerteen, a PCB dielectric fluid sold by Westinghouse. In his article, apparently written for Westinghouse, Dr. Von Oettinger noted the following:

- a. Inerteen was less toxic than trichlorobenzene, which was used in Inerteen;
- b. that the intake of fatal doses (perhaps 3 to 5 teaspoonfuls) will cause hyperemia of all internal organs, extensive degeneration of the liver, and damage of the mucous membranes of the stomach. With smaller doses, these effects were less severe and there was some tendency toward healing if further absorption was prevented;
- c. Simple contact of Inerteen with human skin causes dryness of the skin, thickening and scaling, and sufficient quantities may be absorbed in this way to cause damage of the liver;
- d. Inerteen contact with the skin should be avoided;
- e. In view of the possibility of a toxic action of this material on the liver, persons suffering from injuries of the liver (jaundice) syphilis, and heart diseases should be excluded from operations where Inerteen is handled;
- f. Workers handling Inerteen or with frequent exposure to its vapors should undergo periodic medical examinations. Special attention should be paid to the condition of the liver.

Westinghouse did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

At a November 17, 1969 meeting at Monsanto, a discussion was held regarding the PCB problem and a program was outlined for coping with it. A subsequent presentation of the PCB Management Plan indicated Monsanto's concern is great because of the \$21 M worldwide business involved with gross profits of \$10 M on a net investment of approximately \$9 M.

In 1970, Monsanto made an effort to terminate the use of PCBs for cutting oil, medicinal, dental and cosmetic applications.

In June of 1969, 50 pounds per day of PCB was leaving the Monsanto plant in Anniston. In April of 1969, 700 pounds per day was leaving the Monsanto plant in Sauget, Illinois as part of the plant effluent, reduced to 200 pounds per day in March of 1970, reduced to 65 pounds per day when the report was written, and 30 pounds per day were lost to effluent at the Monsanto plant in Newport. .

In 1970, Monsanto was earning \$10 MILLION per year using PCBs as a pesticide extender, \$90 MILLION per year using PCBs in medicinal, dental and cosmetic applications, and \$50 MILLION per year using PCBs in cutting oil.

Monsanto did a study begun in Florida in 1938 to determine the biodegradability of aroclor. When this material was excavated in 1969, it was determined that after 30 years, the Aroclor was still present and had not migrated to any significant degree.

PCBs were first synthesized and described in 1891. PCBs were first produced in the U.S. by Swann Research, later acquired by Monsanto. The first major use of PCBs was apparently as a liquid dielectric in capacitors manufactured by GE starting in 1930. A Monsanto marketing guide to PCBs published in the late 1960s described the possible use of PCBs in insecticides and in other uses. The available data on the toxicity of PCBs was first summarized in 1931. Skin problems attributed to PCB exposure were later reported to be associated with various industrial processes including PCB manufacturing, capacitor manufacturing, industrial painting, and electrical cable insulating. Systemic effects of exposure to mixtures of chlorinated organic compounds including PCBs were also noted during the 1930s and were evaluated in animal exposure studies in 1938, 1943 and 1944. In much of this early work, the toxicity studies used commercial mixtures, with included by PCB and chlorinated naphthalene, and the effects of one or the other were not conclusively demonstrated. None of Defendants ever undertook to conduct those tests or, if they were undertaken, Defendants have not made public the results of those tests. Animal exposure tests eventually defined the toxicity of PCBs beginning in the early 1940s. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Any mailings by defendants to public utilities regarding the PCB problem were not sent to Nevada Power and if they were sent, they did not adequately describe the potential harm to health and the environment, nor other information that would suggest PCBs may be taken off the market or regulated severely.

All of the facts contained in Plaintiff's exhibit 1609 which is too voluminous to include in this interrogatory response are hereby incorporated as contentions. The information in the exhibit was never imparted to Nevada Power.

In 1970, Monsanto was telling its customers that, despite the growing body of information that PCBs are ubiquitous in the environment and potential hazards to health and the environment, it intended, nonetheless, to continue to make PCB products available to the electrical industry for use in sealed capacitors and transformers.

In 1970, GE was the largest single user of Monsanto's PCBs.

Important toxicity information on PCBs was not imparted to the business people within defendants' organizations which resulted in that information being withheld from Nevada Power.

Defendants coordinated the development of standards by IEEE and NEMA relating to PCBs by taking positions of authority in those organizations in order to develop those standards. The result was an obfuscation of toxicity data on PCBs and the withholding of information on the toxicity data on PCBs.

On January 9, 1969, an industrial hygienist of the Ford Motor Company wrote to Mr. John Ferry, industrial hygienist, GE, Schenectady, asking that a questionnaire be complete on the characteristics of GE's transformer fluid. The inquiry apparently led Mr. Ferry to contact Elmer Wheeler of Monsanto and learn - for the first time by anyone - of Monsanto's developing concern that PCBs could represent an environmental problem. Ferry communicated this information to GE in June of 1969. This information was not timely or adequately imparted to Nevada Power.

In April of 1969, E.L. Raab wrote managers of engineering in transformer and capacitor departments, passing along information which GE's medical director had received from Monsanto relative to west coast publicity on the ecological threat being associated with PCBs. The medical director and industrial hygienist of Monsanto had given the same information to GE's corporate medical director and other GE employees. This information was not imparted to Nevada Power in an adequate or timely manner.

All of the major facts contained in plaintiff's exhibit 1628 which are too voluminous to list in this interrogatory response are hereby incorporated as contentions. The information in this exhibit was not imparted to Nevada Power.

In February of 1971, Monsanto wrongfully informed its customers that aroclor 1221 was biodegradable.

Defendants intentionally attempted to thwart the development of dry transformers as substitutes for PCB filled transformers.

In 1959, Monsanto's assistant medical director wrote to Westinghouse's administrator of industrial hygiene as stated:

"...it is possible that prolonged or repeated skin contact [with PCBs] could lead to chloracne....This indicates to me, however, that sufficient exposure, whether by inhalation of vapors or skin contact, can result in chloracne which I think we must assume could be an indication of more serious systemic injury if the exposure was allowed to continue."

Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1959, Defendants were familiar with the literature on the potential adverse health and environmental impact of PCBs, yet they did not impart that information to Nevada Power. Specifically, they were aware of the 1937 Drinker study and roundtable discussion, and the paper by Dr. Von Oettingen entitled "The Halogenated Hydrocarbons Toxicity and Potential Dangers," along with the papers referred to in that publication.

On or about December of 1971, a publication appeared which Monsanto and perhaps GE and Westinghouse believed would result in "extended legal liability" action against Monsanto, and the manufacturers and users of PCBs for detrimental environmental effects, unionized worker safety hazards, yet this information was not imparted to Nevada Power. .

On or about December of 1971, a publication reported that in 1971, nearly 100 scientists from around the world gathered in North Carolina to discuss PCBs under the auspices of the National Institute of Environmental Health Sciences. It was reported at the conference, and in the publication, that PCBs are everywhere. Scientists have detected these ubiquitous and toxic chemicals in rainfall, unsedimented Arctic lakes, snow fields and the ocean; they're in the body fat of most birds, fish, animals, and man; they've killed mink in quantities as small as 10 ppm in the body; they've contaminated poultry and have turned up in recycled food packaging materials. Spectacular industrial outbreaks of PCB poisoning have occurred in Japan and West Germany, producing horrendous skin eruptions in persons affected by huge doses of thousands of parts per million. The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1971, PCBs were linked with Polychlorinated dibenzofurans. The defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

By 1971, Monsanto was involved in a variety of law suits relating to PCBs and their potential harm to human health and the environment, yet Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In November of 1970, Monsanto reported to GE that it planned to do everything in its control to remain a supplier of PCBs to the transformer and capacitor industries, an attitude that was relayed to defendants' sales people and to Nevada Power.

In April of 1970, Monsanto reported that silicone was a possible substitute for PCBs, but wrongfully reported that their costs was prohibitive. In fact, when a change was made to silicone, the cost was slightly more than PCB transformers and capacitors. Thus, the switch to silicone took longer than it should have, since no demand was created because of the erroneous cost information.

In April of 1970, Westinghouse informed Monsanto that it needed to know "What do we tell our customers? re disposal of failed capacitors and PCBs." Monsanto stated it must come up with some type of response for its customers indicating that it had been asked that questions at almost every account.

In July of 1971, the utility industry was known by Westinghouse and Monsanto to be "living from hand to mouth" regarding capacity and that capacitors were the key.

In 1974, defendants knew that the electric utility industry could pay three to four times the price of transformers and capacitors with PCBs for a product that had suitable characteristics and no environmental problems. It was feared, however, that dry transformers would take over the market because of economics.

All of the facts in Plaintiff's exhibit 1682, which is too voluminous to reproduce in this interrogatory response are hereby incorporated as contentions. Defendants did not impart the information to Nevada Power in a timely, adequate manner.

In 1954, it was published that an exposure to vapors from an old PCB filled heat exchanger produced poisoning like that that occurred in Yusho, Japan, and which may have been caused, in part, by impurities such as polychlorinated dibenzofurans and polychlorinated dibenzodioxins, as well as PCBs. Defendants did not impart this information to Nevada Power in a timely and adequate manner.

GE was informed in 1976 or 1977 that its workers suffered from chloracne, yet defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In April of 1970, Defendants knew and admitted that it had been established that PCBs were in the general environment in many (if not all) parts of the world in sufficient quantity that nature, through various concentrating phenomena, can make them highly toxic if not lethal to certain forms of animal life, yet Defendants did

not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1946, defendants knew of "incidents" in a Westinghouse plant involving workers exposed to PCBs, yet defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1946, defendants knew that prolonged exposure to PCB vapors could produce severe lung reactions, which might best be described as "chemical pneumonia," yet defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

The transformers and capacitors containing PCBs that were made with PCBs manufactured by Monsanto and sold by GE and Westinghouse have contained 0 - 2 ppm chlorodibenzofuran.

In 1961, Monsanto wrote to GE and said that exposure to high concentrations of PCB vapors for a short period do not constitute a serious hazard and that at normal temperatures, there should be no problem, and that in regard to skin contact, PCBs would act much like a common paint thinner or remover leading to drying and cracking of the skin, when in fact they knew PCBs caused much more serious adverse health effects.

In 1972, Westinghouse informed its own in-house staff, but not its customers, of pending lawsuits involving PCBs, of an indemnification requirement with Monsanto.

GE had a document destruction policy for documents addressing transformers and capacitors, yet did not inform Nevada Power in a timely or adequate manner.

In 1987, GE acknowledged that product claims/liability will be a fact of life long after that last large transformer and bushing is shipped from its Pittsfield plant. It recommended that, to reduce its liability exposure, care be given then to records disposal and retention.

Westinghouse informed its employees during the 1970s that "we have no knowledge of any health or environmental problems caused by the use of PCB's in W capacitors" when, in fact, they knew that was not true.

All of the major facts contained in Plaintiff's exhibit 1743 which is too voluminous to reproduce in this interrogatory response are hereby incorporated as contentions. Defendants did not impart this information to Nevada Power in a timely and adequate manner.

All of the major facts contained in Plaintiff's exhibit 1750 which is too voluminous to reproduce in this interrogatory response are

hereby incorporated as contentions. Defendants did not impart this information to Nevada Power in a timely and adequate manner.

All of the major facts contained in Plaintiff's exhibit 1757 which is too voluminous to reproduce in this interrogatory response are hereby incorporated as contentions. Defendants did not impart this information to Nevada Power in a timely and adequate manner.

Westinghouse purchased all of its PCBs from Monsanto.

All of the major facts contained in Plaintiff's exhibit 1760 which is too voluminous to reproduce in this interrogatory response are hereby incorporated as contentions. Defendants did not impart this information to Nevada Power.

All of the major facts contained in plaintiff's exhibit 1793 which is too voluminous to reproduce in this interrogatory response are hereby incorporated as contentions. Defendants did not impart this information to Nevada Power.

Monsanto was the sole domestic supplier of PCBs.

GE had its liability for PCB sales appraised by Applied Mathematics Laboratory of the Group Technical Resources Operation, including an estimate of their liability in the event of spills and the costs of those spills. GE determined to continue its PCB sales because the profit margin was greater than the anticipated costs from its potential liability.

In 1975, Westinghouse reported that its labels for PCBs were deficient.

Monsanto frequently shipped Inerteen to Westinghouse customers.

In its early use of PCBs, Westinghouse provided greater information on the hazards of PCBs, than they did later during the 1970s and Nevada Power was not aware of the earlier warnings given by Westinghouse.

In 1976, GE informed its customers that retrofilling transformers containing PCBs is not a good idea.

All of the major facts contained in Plaintiff's exhibit 1905 which is too voluminous to reproduce in these interrogatory responses are hereby incorporated as contentions. Defendants did not disclose this information to Nevada Power in a timely and adequate manner.

In 1947, Defendants knew that "Chronic poisoning may occur where there are repeated or recurring exposures to a sufficient concentration of Inerteen ...vapor over a period of months or years" and that "[s]uch exposures may produce internal bodily injury which may be disabling or could be fatal." They also knew

that inerteen is highly toxic if taken internally, the swallowing of approximately one or two ounces may cause serious internal injury or perhaps death, and that it can be absorbed through the skin and can produce toxic reactions inernally and that it can cause chloracne. Yet, defendants did not adequately impart that information to Nevada Power, nor did they inform Nevada Power that they knew that information in 1947.

In March of 1969, Monsanto was informed that the PCB pot was really boiling, but did not inform Nevada Power of that fact, nor what was meant.

In 1970, Westinghouse knew that local, state, and federal regulations for PCBs were forthcoming and suggested a review of its liabilities to determine what programs it should be instituting.

In 1969, Monsanto instructed its sales people not respond to any questions relating to PCBs and, instead, to refer them to employees at Monsanto's corporate headquarters.

In 1969, Monsanto believed there would be regulatory action taken regarding the use, manufacture, and disposal of PCBs, but did not inform Nevada Power of that fact.

In 1971, Westinghouse believed it may have to reword the warning labels used on its PCB products to limit its liability.

In 1974, Monsanto knew PCDF's were highly toxic, and that they were present in aroclor products, yet they did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

The lower chlorinated PCBs were more biodegradable than the higher chlorinated PCBs, yet the lower chlorinated PCBs were also more toxic and defendants did not impart this informatiaon to Nevada Power.

The major facts in Plaintiff's exhibit 1958 which is too voluminous to reproduce in these interrogatory responses are hereby incorporated as contentions. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved and did not provide this information to Nevada Power in a timely and adequate manner.

At least 150 lawsuits have been brought against Monsanto relating to their manufacture of PCBs.

In 1945, Monsanto admitted in an Aroclor applications bulletin that prolonged exposure to Aroclor vapors evolved at high temperature or by repeated oral ingestion will lead to systemic toxic effects. No other Monsanto publication prior to 1980 contained that warning. Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In an early operations manual intended solely for employees at Monsanto's Krummrich plant, Monsanto admitted that Aroclor has a high toxicity for vapor inhalation, that it can cause dermatitis, systemic poisoning from the fumes, and yellow atrophy of the liver, yet defendants did not impart this information to Nevada Power, nor did they impart the information that defendants knew these facts in the 1930s and 1940s.

Monsanto had various safety procedures for workers exposed to PCBs, such as changes of clothing, showers, impervious gloves, and regular medical checkups, that were not made known to Nevada Power. However, Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1975, Monsanto knew Aroclor 1016 was classified as a severe and primary skin irritant in tests performed by Younger Laboratories which showed reduced appetite and activity (one to three days in survivors), increased weakness, collapse and death in laboratory animals, and with gross autopsies of the decedents that included hemorrhagic lungs and liver and gastrointestinal inflammation for gall bladder, darkened kidney and spleen, and gastrointestinal inflammation for dermal ingestion. Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1971, Sweden passed laws to prohibit or prescribe import, manufacture, sale and use of PCB or products containing PCB, yet defendants did not notify Nevada Power of this in a timely and adequate manner.

On May 22, 1969, Monsanto's Board of directors approved spending \$1,100,00 for expansion of the solid Aroclor facilities at the Anniston, Alabama plant despite the fact that it knew or should have known at that time of environmental and human health hazards associated with the production and use of PCBs and productions containing PCBs.

Monsanto admitted in 1970 that no foreign PCBs were being imported for use in domestic electrical transformers and capacitors.

In February of 1971, Monsanto admitted PCBs are "extremely resistant" to biodegradation, yet it knew this informatoin years before and did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Polychlorinated dibenzo furans are an impurity or byproduct of PCBs, a highly toxic chemical, and this information was never made known to Nevada Power in a timely and adequate manner.

In 1970, Monsanto informed its business group members that they were not to answer questions relating to PCBs in writing and that if a written request was sought, it should be directed to corporate headquarters, and also informed them that "We don't want to take [PCB] fluid back." Instead, they were ordered to sell customers replacement PCB alleged to biodegrade better.

In 1969, Monsanto's corporate development committee admitted that to avoid legal action relating to PCBs, it had to "provide adequate warnings to customers and users, including advice as to disposal methods."

On 11/10/60, a rough draft of an outline on "PCB Environmental Pollution Abatement Plan" was prepared. Plaintiff incorporates the document in its entirety as facts supporting its response to defendants' contention interrogatories.

Plaintiff incorporates Exhibit 425 in its entirety as facts supporting its response to defendants' contention interrogatories.

In 1969, Monsanto wrote a letter acknowledging that PCBs had been laced in soil in Florida 30 years earlier. Monsanto admitted that examining that soil "might be much more valuable than any accelerated test [to determine biodegradability] that could be devised." Monsanto dug up the earth and discovered that the PCB did not biodegrade, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1968, Monsanto received a letter from the United States Department of the Interior, Fish and Wildlife Service, stating that it was brought to their attention that PCBs and PCB compounds have found in avian and animal tissues and that this agency was conducting its own studies on that problem, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1955, Monsanto's medical department advised employees that the eating of lunches should not be allowed in the PCB department because the PCB vapors could contaminate the lunches, contaminated hands could contaminate the lunches, that eating in process departments is a potentially hazardous procedure that could lead to serious difficulties, and that "while the Aroclors [PCB] are not particularly hazardous from our own experience, this is a difficult problem to define because early literature work claimed that chlorinated biphenyls were quite toxic materials by ingestion or inhalation. In any case, where workmen claimed physical harm from

any contaminated food, it would be extremely difficult on the basis of past literature reports to counter such claims," yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1955, Monsanto was aware of the difference in toxicity between Aroclor 1254 and 1242 and stated its position as follows: "We know Aroclors are toxic but the actual limit has not been precisely defined. It does not make too much difference, it seems to me, because our main worry is what will happen if an individual develops any type of liver disease and gives a history of Aroclor exposure. I am sure the juries would not pay a great deal of attention to MAC's [maximum allowable concentrations]."

In 1954, Monsanto had run tests on animals for about 60 days at roughly seven times the one milligram per cubic meter level and found liver damage, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1950, Monsanto learned that a plant using PCBs had employees whose chief complaints were irritation of the upper respiratory tract plus possible liver damage, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1950, the Indiana State Board of Health informed Monsanto that several Indiana industrial workers became ill due to the inhalation of PCB vapors, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

Monsanto manufactured and sold PCBs from 1957 to 1977 in accordance with Exhibit 443, which is incorporated herein in full.

In 1973, a division of the Organization for Economic Cooperation and Development met in Paris and directed that each member nation ensure that PCBs shall not be used for industrial or commercial purposes, except for limited circumstances, including in dielectrics, yet Monsanto did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

The major facts contained in plaintiff's Exhibit 207 are incorporated herein as contentions. General Electric did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1972, GE wrote that the only adverse health effects experienced by U.S. workers exposed to PCBs, either during the manufacture of these liquids or of electrical equipment containing these liquids, have been limited to occasional cases of non-chronic chloracne or

other temporary skin lesions or irritations, when, in fact, GE knew that was not true since it reported in 1937 severe cases of chloracne among its own workers exposed to PCBs.

In 1972, GE estimated the total PCBs which have escaped to the environment, and which are an environmental burden, to be  $1.5 \times 10$  to the fifth power tons.

In 1972, GE stated that PCBs in capacitors are a major problem because they are in small appliances which will probably all be discarded and the PCBs will enter the environment, yet defendants never imparted this information to Nevada Power.

From 1966 to 1975, GE purchased over 82 million pounds of PCBs, all from Monsanto.

In 1975, an administrative proceeding by the Department of Environmental Conservation regarding GE found that Aroclor 1016 has been found to be a deceptive numerical designation because the chemical has ten carbons, not 12, and contains over 41% chlorine, not 16%. There was no scientific reason for naming the chemical 1016 and following the old nomenclature, it should have been called 1241 plus.

In 1975, an administrative proceeding by the Department of Environmental Conservation regarding GE found that fish from the Hudson River, downstream from the GE plant, reached over 100 times in excess of the level of PCBs allowed by the Food and Drug Administration, yet General Electric did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1975, an administrative proceeding by the Department of Environmental Conservation regarding GE found that a reading of 2800 PPM PCB was taken at the confluence of the Hudson River and a GE plant, yet General Electric did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1975, an administrative proceeding by the Department of Environmental Conservation regarding GE found that GE's unlawful discharge of PCBs into the Hudson River was a corporate abuse in that GE caused the PCBs to be discharged without exercising sufficient precaution and concern.

In 1975, an administrative proceeding by the Department of Environmental Conservation regarding GE found that it has been administratively proven that PCBs are toxic in part because they biomagnify in the human food chain up to 200,000 times from one species to another.

The major facts contained in plaintiff's Exhibit 221 are incorporated herein as contentions. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1980, GE maintained a system for determining which of its transformers contained PCBs and such a list would show which of the transformers it sold contained PCBs.

Since the late 1920s, Monsanto was the sole supplier of PCBs to the U.S. manufacturers using PCBs.

The major facts contained in plaintiff's Exhibit 855 are incorporated herein as contentions. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

In 1971, ANSI C-107 was informed that prolonged exposure of PCB liquid or vapor to the skin should be avoided to prevent possibility of chloracne and possible damage to the liver and kidney, yet defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

The major facts contained in plaintiff's Exhibit 947 are incorporated herein as contentions. Defendants did not issue any related precautions or warnings that were adequate, timely, or commensurate with the hazards involved.

It was known in 1955 that Aroclor 1254 and 1242 had different toxicities.

**APPENDIX B**

**EXHIBITS TO PLAINTIFF'S CONTENTIONS**

| <b>Bates No.</b> | <b>Exhibit</b> | <b>Description</b>                                                                                                                                |
|------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| A00001-          | 1              | Author - D. Fabbi from the Safety Department. Recipient - personnel at Nevada Power. Dated December 15, 1976.                                     |
| A000002-A000232  | 2              | Author - U.S. Department of Health Education and Welfare. Recipient - Nevada Power. Dated September, 1977.                                        |
| A000233-A000236  | 3              | Author - Ricky Slate. Recipient - Nevada Power. Dated May 29, 1978.                                                                               |
| A000237-A000238  | 4              | Article from Las Vegas Review Journal. Dated May 7, 1979.                                                                                         |
| A000239-A000258  | 5              | Author - EPA. Recipient - Nevada Power Company. Dated June, 1979.                                                                                 |
| A000259-         | 6              | Article from Las Vegas Review Journal. Dated September 16, 1979.                                                                                  |
| A000260-A000267  | 7              | Letters from Donald Fabbi of Nevada Power to Clark County Fire Departments. Dated September 26, 1979.                                             |
| A000268          | 8              | Letter from Sam Cooper, Fire Chief of Las Vegas Fire Department to Donald G. Fabbi, Safety Direct of Nevada Power Company. Dated October 5, 1979. |
| A000269-A000270  | 9              | Article from Las Vegas Review Journal. Dated October 12, 1979.                                                                                    |
| A000271          | 10             | Memo from Nevada Power Company, Safety Director Donald Fabbi to Distribution List. Dated October 22, 1979.                                        |
| A000272          | 11             | Article from Las Vegas Sun. Dated October 25, 1979.                                                                                               |
| A000273          | 12             | Article by Ann Kofol of The Valley Times. Dated October 25, 1979.                                                                                 |
| A000277-A00275   | 13             | Article from Las Vegas Review Journal. October 26, 1979.                                                                                          |
| A000276-A000290  | 14             | Letter from Clyde B. Eller, U.S. EPA to Arthur E. Pierson, Nevada Power Company. Dated October 24, 1979.                                          |

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| A000291-A000318 | 15 | Memo from D. Fabbi, Safety Director of Nevada Power Company to Distribution List. Dated November 23, 1979.                                                  |
| A000319-A000329 | 16 | Author is United States Environmental Protection Agency. Recipient is Nevada Power Company. Dated December 1979.                                            |
| A000330-        | 17 | Article from Las Vegas Review Journal. Dated December 30, 1979.                                                                                             |
| A000331-        | 18 | Article from Las Vegas Review Journal. Dated February 12, 1980.                                                                                             |
| A000332-A000335 | 19 | Author is Nevada Power Company. Recipient is Customer. Dated July 28, 1980 (Draft).                                                                         |
| A000336-A000341 | 20 | Consent Agreement and Order from United States Environmental Protection Agency. Region IX. In Re: Nevada Power Company, Respondent. Dated October 10, 1980. |
| A000342-        | 21 | Article from Valley Times. Dated November 4, 1980.                                                                                                          |
| A000343-A000353 | 22 | Memo from Keith Grant to Donald Fabbi. Dated December 1, 1980.                                                                                              |
| A000354-A000355 | 23 | Letter from Donald Fabbi to Louis Peniero. Dated December 9, 1980.                                                                                          |
| A000356         | 24 | Article by Tom Tiede from Las Vegas Review Journal. Dated December 23, 1980.                                                                                |
| A000357-A000358 | 25 | Article from Las Vegas Sun. Dated February 26, 1981.                                                                                                        |
| A000359-A000360 | 26 | Article by Robert Growfisher, Las Vegas Sun. Dated March 10, 1981.                                                                                          |
| A000361-        | 27 | Article from unknown newspaper. Title: Workers Fear Dioxin Poisoning.                                                                                       |
| A000362-A000363 | 28 | Author is Review Journal. Recipient is Nevada Power Company. Dated March 19, 1981.                                                                          |
| A000364-        | 29 | Article from Review Journal. Dated July 13, 1981.                                                                                                           |
| A000365-A000367 | 30 | Nevada Power Company Meeting Summary Re: affected parties at PCB spill. Dated October 8, 1981.                                                              |

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| A000368-A000381 | 31 | Safety Survey Results by National Safety Counsel, public utility section. Dated October, 1981.                                                  |
| A000383-        | 32 | Article from Las Vegas Sun. Dated December 16, 1981.                                                                                            |
| A000384-A000385 | 33 | Material Safety Data Sheet from Nevada Power Company. Dated January 1982.                                                                       |
| A000386-A000593 | 34 | Report by Drill, Freiss, Hays, Loomis & Shaffer, Inc., consultants in toxicology. Dated February 12, 1982.                                      |
| A000594-A000597 | 35 | Memo from Mark Reddaway to Donald Fabbi and John McCarthy. Dated May 4, 1982.                                                                   |
| A000598-        | 36 | Letter from Jerry Gavin, Jr., environmental scientist. Recipient is Donald Fabbi, Safety Director of Nevada Power Company. Dated June 14, 1982. |
| A000599-A000600 | 37 | Food & Feed Location Survey by Mark Reddaway, Nevada Power Company. Dated June 21, 1982.                                                        |
| A000601-        | 38 | Letter from Donald Fabbi to Jerry Gavin, Jr., Environmental Protection Agency. Dated June 23, 1982.                                             |
| A000602-A000605 | 39 | Letter from Richard Morrissey, Edison Electric Institute to Public Information Officers. Dated July 29, 1982.                                   |
| A000606-A000624 | 40 | Environmental Protection Agency 40 CFR Part 761 (Part II). Dated August 25, 1982.                                                               |
| A000625-A000626 | 41 | Memo from Donald Fabbi to John McCarthy and Keith Grant. Dated September 7, 1982.                                                               |
| A000627-A000631 | 42 | Memo from Stephen Yohay to Melodye A. Turek, Edison Electric Institute. Dated September 28, 1982.                                               |
| A000635-        | 43 | Transcript from ABC News Nightline Show #368. Dated October 6, 1982.                                                                            |
| A000636         | 44 | Letter from Donald G. Fabbi, Nevada Power Company to Lloyd Spragins, National Electrical Manufacturer Association. Dated October 6, 1982.       |

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| A000637         | 45 | Letter from Celeste Y. Chin to Donald G. Fabbi, Safety Director of Nevada Power Company. Dated October 29, 1982.                                                                           |
| A000638         | 46 | Article by Mark A. Stein, Los Angeles Times. Dated May, 1983.                                                                                                                              |
| A000639-A000641 | 47 | Nevada Power Company Annual 47PCR Refresher Training & Program update outline to Substation Department. Dated 1983.                                                                        |
| A000642-A000650 | 48 | Environmental Protection Agency 40 CFR Part 761 (Part III). Dated March 23, 1984.                                                                                                          |
| A000651         | 49 | Letter from Dennis Meacham, Facilities Manager of Sparklets Drinking Water Corporation to Ed Anderson, of Nevada Power Company. Dated March 29, 1984.                                      |
| A000652         | 50 | Memo from D. Fabbi, Safety Director of Nevada Power Company to John McCarthy. Dated April 6, 1984.                                                                                         |
| A000653-A000656 | 51 | Environmental Protection Agency 40 CFR Part 761 (Part III). Dated October 11, 1984.                                                                                                        |
| A000657-A000658 | 52 | Memo from Donald Fabbi to John McCarthy. Dated November 13, 1984.                                                                                                                          |
| A000659-A000675 | 53 | Letter from Thomas J. Vorenberg, CSM Director of Marketing and Operations, southwest region to Donald G. Fabbi, Manager of Safety Services of Nevada Power Company. Dated August 30, 1985. |
| A000676         | 54 | Article by Ed Vogel, Las Vegas Review Journal. Dated April 19, 1985.                                                                                                                       |
| A000677-A000736 | 55 | Report by D. Fabbi Re: Control and Handling Procedures for PCBs. Dated Revised August 20, 1985.                                                                                            |
| A000737-        | 56 | Article by Mark Dent, Las Vegas Review Journal. Dated March 14, 1986.                                                                                                                      |
| A000738-A000802 | 57 | Nevada Power Company report "Benefits of Membership Assessment". Dated April 10, 1986.                                                                                                     |
| A000803-A000815 | 58 | Safety Services, Nevada Power Company Status Report. Dated May 13, 1986.                                                                                                                   |

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| A000816-A000817 | 59 | Memo from D. Fabbi to John McCarthy.<br>Dated July 13, 1988.                                                                                                                                                                                                                   |
| A000818         | 60 | Letter from Jeff Zelikson to Richard L.<br>Hinkley, Staff Counsel of Nevada Power<br>Company. Dated July 22, 1988.                                                                                                                                                             |
| A000819-A000825 | 61 | Consent Agreement and Final Order from<br>United States Environmental Protection<br>Agency to Nevada Power Company,<br>Respondent. Dated July 22, 1988.                                                                                                                        |
| A000826-A000827 | 62 | In Re: Nevada Power Company's Power<br>Plants and PCB slide presentation.<br>Dated 1989?                                                                                                                                                                                       |
|                 | 63 | [Reserved]                                                                                                                                                                                                                                                                     |
| B000001-B000003 | 64 | Author is National Electrical<br>Manufacturers Association. Recipient is<br>Donald L. Peyton, managing director of<br>American National Standards Institute.<br>Dated November 19, 1970.                                                                                       |
| B000004-B000009 | 65 | Letter from Bernald H. Falk, National<br>Electrical Manufacturers Association to<br>all Representatives of Member Companies<br>in the transformer section and capacitor<br>section. Dated August 2, 1971.                                                                      |
| B000010-B000020 | 66 | National Electrical Manufacturers<br>Association Minutes of Technical<br>Committee Capacitor Section. Dated<br>October 27, 1972.                                                                                                                                               |
| B000021-B000026 | 67 | National Electrical Manufacturers<br>Association Official Standards Proposal.<br>Dated January 25, 1973.                                                                                                                                                                       |
| B000027-B000035 | 68 | American National Standards Institute<br>Guidelines. Approved January 9, 1974.                                                                                                                                                                                                 |
| B000036-B000045 | 69 | Letter from Bernard H. Falk, National<br>Electrical Manufacturers Association to<br>Dr. C. Hugh Thompson, Chairman Hazardous<br>and Toxic Substance Regulation Task<br>Force, Office of Water Program<br>Operations, Environmental Protection<br>Agency. Dated March 25, 1974. |
| B000046         | 70 | Letter from Bernard H. Falk, National<br>Electrical Manufacturers Association to<br>All Representatives of Member Companies<br>in the transformer section and capacitor<br>section. Dated December 29, 1975.                                                                   |

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| B000047-B000055 | 71 | Letter from Bernard H. Falk, National Electrical Manufacturers Association To All Representatives of Member Companies in the transformer section and capacitor section.. Dated January 23, 1976. |
| B000056         | 72 | Letter from J. J. Kark, National Electrical Manufacturers Association to all National Electrical Manufacturers Association representatives on the ANS committee C107. Dated December 19, 1978.   |

**WESTINGHOUSE**

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| C000001-C000010 | 73 | Title: The Effect of Inerteen and Several Related Substances Upon the White Rat. Author is W.T. Read, Jr., M.D. Date unknown.                                                                                                                  |
| C000011-C000013 | 74 | Title: Toxicity and Potential Dangers of Inerteen.                                                                                                                                                                                             |
| C000014-C000016 | 75 | Letter from E.C. Barnes, Industrial Hygiene Engineer. to Cleveland Works, Mr. J.W. Wigert, Materials and Process Engineer. Dated September 15, 1947.                                                                                           |
| C000017-C000020 | 76 | Title: Engineering Data Letter No. 1219-A. Handling of Inerteen Transformers Which Fail in Service. Author is W.W. Satterlee, division engineer. Approved by F.L. Snyder, manager, transformer engineering department. Dated October 15, 1946. |
| C000021         | 77 | Letter from W.E. McCormick, department of industrial hygiene and toxicology to Mr. H.W. Speicher, headquarters medical department, Westinghouse Electric Corp. Dated July 11, 1955.                                                            |
| C000022         | 78 | Letter from H.W. Speicher, Administrator Industrial Hygiene, to Mr. W.E. McCormick, Department of Industrial Hygiene and Toxicology the B.F. Goodrich Company, Akron, Ohio. Dated July 28, 1955.                                               |
| C000023-C000079 | 79 | Civil Action No. 85-CI-1724 Pike Circuit Court Division No. 1. <u>David Adams v. Kentucky Power</u> , Westinghouse documents.                                                                                                                  |

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| C000080-C000081 | 80 | Letter from H.W. Speicher, Administrator Industrial Hygiene written to Elmer F. Wheeler, Monsanto Chemical Company. Dated July 16, 1956.                                                                                              |
| C000082-C000084 | 81 | Letter from H.W. Speicher, Administrator Industrial Hygiene, written to Mr. Elmer F. Wheeler, Assistant Director, Medical Department, Monsanto Chemical Company, St. Louis, Missouri. Dated July 19, 1956.                            |
| C000085         | 82 | Letter from Newton E. Whitman, Industrial Hygiene Chemist, written to H.W. Speicher, Administrator Westinghouse Electric Corp. Industrial Hygiene, East Pittsburgh, Pennsylvania. Dated September 17, 1958.                           |
| C000086         | 83 | Letter from H.W. Speicher, Administrator Industrial Hygiene, written to Mr. Newton E. Whitman, Industrial Hygiene Chemist, Bethlehem Steel Company, Bethlehem, Pennsylvania. Dated September 26, 1958.                                |
| C000087         | 84 | Letter from F.E. Tucker, Industrial Hygienist to Mr. H.W. Speicher, Administrator, Industrial Hygiene, Westinghouse Electric Corp., East Pittsburgh, Pennsylvania. Dated December 5, 1958.                                            |
| C000088         | 85 | Letter from H.W. Speicher, Administrator Industrial Hygiene, Westinghouse Electric Corp., written to Mr. F.E. Tucker, Industrial Hygienist, Weirton Steel Company, Weirton, West Virginia. Dated December 23, 1958.                   |
| C000089-C000090 | 86 | Letter from Frank C. Wright, Safety Engineer, U.S. Naval Ordinance Laboratory to Safety Director, Westinghouse Electric Corp., East Pittsburgh, Pennsylvania. Dated October 8, 1959.                                                  |
| C000091-C000092 | 87 | Letter from H.W. Speicher, Administrator Industrial Hygiene, Westinghouse Electric Corp., written to Mr. Frank C. Wright, Safety Engineer, U.S. Naval Ordinance Laboratory, White Oak Silverspring, Maryland. Dated November 2, 1959. |

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|                 | 88 | [Reserved]                                                                                                                                                                                                                  |
| C000093-C000095 | 89 | Elmer P. Wheeler, Assistant Director, Medical Department, written to H. Wilbur Speicher, Administrator Industrial Hygiene, Westinghouse Electric Corp., East Pittsburgh, Pennsylvania. Dated October 23, 1959.              |
|                 | 90 | [Reserved]                                                                                                                                                                                                                  |
|                 | 91 | [Reserved]                                                                                                                                                                                                                  |
|                 | 92 | [Reserved]                                                                                                                                                                                                                  |
| C000096-C000097 | 93 | Author is Elmer P. Wheeler, Assistant Director Medical Department, recipient is Mr. H. Wilbur Speicher, Administrator Industrial Hygiene, Westinghouse Electric Corp., East Pittsburgh, Pennsylvania. Dated April 30, 1962. |
| C000098         | 94 | Memo by unknown author to Distribution List. Dated September 21, 1967.                                                                                                                                                      |
| C000099         | 95 | Memo from J.G. Bryant to Dunlap, Fuhrmeister Gray Haupt, Kemp, MacPherson, Miller, Papageorge, Ward, Williams, Wright. Dated September 27, 1967.                                                                            |
| C000100-C000103 | 96 | Instructions for handling Inerteen Insulating Fluid PDS 54201 CM and installation and maintenance of Inerteen transformers by Westinghouse Electric Corp. Date effective August, 1971.                                      |
| C000104         | 97 | Letter from Samuel Moore, Chief Industrial Waste Disposal Section Division of Water Pollution Control to Richard Neal, Rural Route 6, Bloomington, Indiana. Dated October 30, 1968.                                         |
| C000105-C000106 | 98 | Memo from Bloomington Works, John L. Shoaff, Materials and Standards Engineer, written to Mr. Robert B. Sawyer, Supervisor Manufacturing Planning, Bloomington Works. Dated November 4, 1968.                               |

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| C000107         | 99  | Letter from O.L. Nichols, Works Engineer, Distribution Apparatus Division, Westinghouse Electric Corporation to Samuel L. Moore, Chief Industrial Waste Disposal Section, Indiana State Board of Health, 1330 West Michigan Street, Indianapolis, Indiana, 46206. Dated November 15, 1968.                                        |
| C000108-C000110 | 100 | Letter from W.R. Richard to P. Benignus-PBENI. Subject is disposal and incineration of Aroclor. Dated April 14, 1969.                                                                                                                                                                                                             |
| C000111-C000112 | 101 | Letter from R. Emmet Kelly, M.D. to W.B. Papageorge. Dated March 30, 1970.                                                                                                                                                                                                                                                        |
| C000113-C000115 | 102 | Letter from G.C. Wilburn, Engineering Manager, South Boston Plant to Mr. J.G. Aldworth. Dated April 23, 1970.                                                                                                                                                                                                                     |
| C000116         | 103 | Letter from Donald A. Olson, Sales Director Functional Fluids, Monsanto Company to Garlington Wilburn, Manager, Manufacturer Westinghouse Electric11111 Corporation, South Boston, Virginia. Dated May 4, 1970.                                                                                                                   |
| C000117-C000118 | 104 | Memo from J.C. Rissinger to J.G. Aldworth, South Boston Plant, Plant Manager. Dated July 27, 1970.                                                                                                                                                                                                                                |
| C000119-C000120 | 105 | Letter from W.B. Papageorge, Manager Environmental Control, Monsanto Company to Mr. Fred R. Viland, Senior Buyer, Westinghouse Electric Corporation, 469 Sharpsville Avenue, Sharon, Pennsylvania, 16146. Dated July 27, 1970.                                                                                                    |
| C000121         | 106 | Letter from John L. Shoaff, M & P Engineer, Bloomington Works to Mr. J.B. Brittain, Engineer Manager, Bloomington Works. Dated July 30, 1970.                                                                                                                                                                                     |
| C000122         | 107 | Letter from John L. Shoaff, Materials and Standards Engineer to Messrs. R.D. Hogan, Manufacturing Manager, MGR; Jack Curl, Manufacturing; Len Nichols, Works Engineer; Roy Dunlap, Supervisor Industrial Relations; Mickey Maguire, Supervisor Traffic and Shipping; Tom Dyer, Supervisor Engineering Lab. Dated August 20, 1970. |

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| C000123         | 108 | Disposal of solid wastes contaminated with Inerteen when handled by an authorized scrap dealer. Approved by Materials Engineer. Accepted by Manufacturing, Purchasing. Date issued August 4, 1970.                                                                                                                                                                                              |
|                 | 109 | [Reserved]                                                                                                                                                                                                                                                                                                                                                                                      |
|                 | 110 | [Reserved]                                                                                                                                                                                                                                                                                                                                                                                      |
| C000125-C000126 | 111 | Author is J.C. Rissinger, Sharon Works. Recipient is South Boston Plant, Plant Manager J.G. Aldworth, Engineer, J.C. Wilburn; Bloomington Plant, Plant Manager, D.M. Sauter, Capacitor Engineer, R.D. McLean; PGH Gateway, 15-E, Legal Department, O.M. Blackburn; Sharon Works, Marketing, D.M. Oliver, Engineering, R.L. Schwab, Distribution Engineering, F.J. Brutt. Dated August 25, 1970. |
| C000127         | 112 | Letter from R.D. Hogan, Manager Manufacturing, Bloomington. Recipient is D.M. Sauter, J.B. Brittain, W.P. Wheeler, G.L. Miller, D. McClain, R. Sawyer, L. Shoaf, H. Pickett, L. Nichols, R. Thompson, N.E. Maguire, J. Curl, R. Ripplinger, D. Swafford. Dated September 8, 1970.                                                                                                               |
| C000128-C000136 | 113 | Letter from J.C. Rissinger to L.B. Rademacher, L.J. Besch, W.T. Brennan, T.K. Sloat, R.F. Meyer, R.G. Himstrett. Dated January 12, 1971.                                                                                                                                                                                                                                                        |
| C000137-C000138 | 114 | Letter from D.M. Sauter, General Manager, Distribution Apparatus Division, Bloomington, Indiana to Mr. V.B. Baker, Director, Product Improvement Headquarters Engineering. Dated January 26, 1971.                                                                                                                                                                                              |
|                 | 115 | [Reserved]                                                                                                                                                                                                                                                                                                                                                                                      |
| C000139-C000152 | 116 | Author is T.O. Munson, Manager Aquatic Biological Sciences Westinghouse Ocean Research Laboratory Preliminary Report of Inerteen Environmental Survey at Bloomington Distribution Apparatus Plant. Recipient is Shoupp, Kelly, Kerns, Terrill, Boquist, Brittain, McClain, Shoaff, and Sawyer. Dated October, 1971?                                                                             |

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| C000153-C000173 | 117 | Author is E.R. Boquist, Consultant, Product Safety, Reliability and Environmental Effects Headquarters Engineering. Recipients are Geines, Jr., Herwald, Kelly, Mandelcorn, Shoup, Wiener. Dated December 31, 1971.                                     |
| C000174         | 118 | Author is Howard S. Bergen, Jr., Director Specialty Products Group Monsanto. Recipient is Westinghouse Electric Corp., Box 341, Bloomington, Indiana, 47402. Dated January 20, 1972.                                                                    |
| C000175         | 119 | Author is P.J. Wilson. Recipient is W.O. Carlsen, K. Snyder, H.F. King, F.H. Ford, R. McMullen. Dated March 1, 1972.                                                                                                                                    |
| C000176         | 120 | Author is R. McMullen, Manager, Cincinnati ASD. Recipient is D.R. Pohlman. Dated March 2, 1972.                                                                                                                                                         |
| C000177-C000179 | 121 | Author is Dr. T.K. Sloat, Power Transformer Division, Sharon, Pennsylvania. Recipient is Bloomington Westinghouse. Date received is March 29, 1972. Date revised is November 15, 1972.                                                                  |
| C000180-C000181 | 122 | Author is Westinghouse Proprietary. Title Status of Polychlorinated Biphenyl. Dated April 6, 1972.                                                                                                                                                      |
| C000182-C000183 | 123 | Author is unidentified. Recipient is Mr. J.B. Brittain, Engineering Manager, Bloomington Works. Dated June 22, 1972.                                                                                                                                    |
| C000184         | 124 | Author is R. McMullin, Manager. Recipient is Cincinnati ASD, J.C. Stock. Dated July 17, 1972.                                                                                                                                                           |
| C000185-C000189 | 125 | Author is Robert D. McClain, Manager, Capacitor Unit Engineering, Bloomington Works. Recipient is Dr. H. Wilbur Speicher, Headquarters Industrial Hygiene. Dated October 18, 1972.                                                                      |
| C000190         | 126 | Letter from R. H. Schumer, Repair Representative, Cincinnati Apparatus Service Division to Mr. Walter R. Gleason, Associate Counsel, Legal Department, Amco Steel Corporation, General Office Building, Middleton, Ohio, 45042. Dated October 23, 1972. |

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| C000191-C000192 | 127 | Letter from Walter Gleason to R.H. Schumer. Repair representative is Cincinnati Apparatus Service Division, Westinghouse Electric Corporation, 1050 Laidlaw Avenue, Cincinnati, Ohio, 45237. Dated October 26, 1972.                                                          |
| C000193         | 128 | Westinghouse Electric Corporation Form Letter Re: PCB (Inerteen) - Care & Handling. Dated October 26, 1972.                                                                                                                                                                   |
| C000194         | 129 | Westinghouse Electric Corporation Form Letter Re: PCB (Inerteen) - Care & Handling. Undated.                                                                                                                                                                                  |
|                 | 130 | [Reserved]                                                                                                                                                                                                                                                                    |
| C000195         | 131 | Letter from Kenneth I. Lutz, Contract Manager to Mr. R. McMullen, Cincinnati Plant. Dated November 6, 1972.                                                                                                                                                                   |
| C000196-C000201 | 132 | Author is Westinghouse Electric Corporation, Industrial Hygiene Laboratory, East Pittsburgh, Pennsylvania. Title Safe Practice Data Sheet Inerteen. Dated November 15, 1972.                                                                                                  |
| C000202-C000203 | 133 | Letter from Dan A. Albert, Staff Supervisor, Personnel Relations to Dr. W.B. Papageorge, Manager Environmental Control, Monsanto Company, Organic Chemical Division, 800 North Linbergh Boulevard, St. Louis, Missouri, 63166. Dated February 3, 1975.                        |
| C000204         | 134 | Letter from W.B. Papageorge, Manager Product Acceptability, Specialty and Process Chemicals to Mr. Dan A. Albert, Staff Supervisor, Personnel Relations, Westinghouse Electric Corporation, Box 290, Highway 58 West, South Boston, Virginia, 24592. Dated February 26, 1975. |
| C000205-C000213 | 135 | Letter from W.B. Papageorge, Manager, Product Acceptability, Specialty in Processed Chemicals to Mr. Dan A. Albert, Staff Supervisor, Personnel Relations, Westinghouse Electric Corp., Highway 58 West, South Boston, Virginia, 24592. Dated March 18, 1975.                 |
| C000214         | 136 | Memo from Floyd A. Bean, Marketing Manager to All Marketing, Westinghouse Electric Corp. Dated August 29, 1975.                                                                                                                                                               |

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| C000215-C000218 | 137 | Report by George E. Mercier Re:<br>Monsanto Trip. Dated September 4, 1975.                                                                                                                                                                                        |
| C000219-C000221 | 138 | D.M. Sauter, Vice President,<br>Westinghouse Electric Corp. comments<br>presented at conference. Dated<br>January 14, 1976.                                                                                                                                       |
| C000222-C000232 | 139 | Author is Westinghouse Electric Corp.<br>Instructions for handling Inerteen<br>insulating fluid P.D.S.s 54201 CM and<br>Installation and Maintenance of Inerteen<br>Transformers dated effective June 1976.                                                       |
| C000233         | 140 | Author D.P. Keiser, Marketing Manager,<br>Transmission and Distribution Group,<br>Westinghouse Electric Corp. Recipient<br>is Industry Purchasing Executives.<br>Dated November 22, 1976.                                                                         |
| C000234-C000240 | 141 | Author is J.A. Alley Industry Specialist<br>Dielectrics Monsanto Industrial<br>Chemicals Co. Recipient is Mr. Dick<br>Jones, Senior Buyer, Westinghouse<br>Electric Corp., 469 Sharpsville Avenue,<br>Sharon, Pennsylvania, 16416. Dated<br>September 22, 1977.   |
| C000241-C000243 | 142 | Author is J. McNally, Capacitor Unit<br>Engineering, To Whom It May Concern,<br>Subject is History Data on Capacitor<br>Dielectrics Inerteen Power Factor<br>Correction Type [Confidential]. Dated<br>December 8, 1978.                                           |
| C000244         | 143 | Author is Richard S. Peoples,<br>Pretreatment Coordinator, City of<br>Bloomington Utilities, P.O. Box 1216,<br>Bloomington, Indiana, 47402, to Mr.<br>Robert Sawyer, Westinghouse Corp., P.O.<br>Box 341 Bloomington, Indiana, 47402.<br>Dated November 11, 1982. |
| C000245-C000383 | 144 | Superior Court of New Jersey Law<br>Division: Union County, Westinghouse<br>Electric Corp. and Thermal King<br>Corporation, Corporations, Plaintiffs v.<br>Liberty Mutual Insurance Company, et<br>al., Complaint and Jury Demand filed May<br>8, 1987.           |

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| C000384         | 145 | Author is Richard Pace, Special Sales Representative, Westinghouse Electric Corporation, 9095 Telstar Avenue, Elmonte, California, 91734. Recipient is Nevada Power Company attention: Mr. Donald G. Fabbi, Manager, Safety Services. Dated February 10, 1989.                              |
| C000385         | 146 | Author is Westinghouse Electric Corp. Recipient is unknown. Memo re: internal handling and control of Inerteen. Undated.                                                                                                                                                                    |
| C000386-C000389 | 147 | Medical Research Project No. MR-46. Toxicity and potential dangers of Inerteen submitted by W.F. Von Oettingen, M.D., Ph.D., Director of Haskell Laboratory of Industrial Toxicology, Wilmington, Delaware. Recipient Westinghouse Electric and Manufacturing Company (file copy). Undated. |
| C000389-C000427 | 148 | Toxicity and Potential Dangers of Inerteen.                                                                                                                                                                                                                                                 |
| C000428         | 149 | Author is Westinghouse Electric Corp. Recipient is form letter re: Indemnification of Westinghouse/Care and Handling of PCBs. Undated.                                                                                                                                                      |
| C000429-C000437 | 150 | PCB yearly sales totals. Westinghouse-all locations. All PCB products 1954-1977.                                                                                                                                                                                                            |
| C000435-C000450 | 151 | Toxicity and Potential Dangers of Inerteen.                                                                                                                                                                                                                                                 |
| C000451-C000472 | 152 | The toxicology of Inerteen and related substances including a method of analysis for halogenated hydrocarbons in the air. Author is A.J. Fleming, M.D.                                                                                                                                      |
| C000473-C000474 | 153 | PCB yearly sales totals. General Electric-all locations. All PCB products 1954-1977.                                                                                                                                                                                                        |
| C000475         | 154 | Author is H. Wilbur Speicher, Administrator, Westinghouse Electric Corporation. Recipient is Mr. Elmer P. Wheeler, Assistant Director, Medical Department, Monsanto Chemical Company, 800 North Lindberg Boulevard, St. Louis 66, Missouri. Dated April 25, 1962.                           |

C000476 155 Author is G.C. Wilburn, Engineering Manager, South Boston Plant, recipient J.G. Aldworth. Subject is PCB-Inerteen environmental threat. Dated April 23, 1970.

156-204 [Reserved]

GENERAL ELECTRIC CORPORATION

D000001-D000003 205 Author is Elmer P. Wheeler, Manager Environmental Health, Monsanto Company, 800 North Lindberg Boulevard, St. Louis, Missouri, 63166. Recipient is Mr. Edward Raab, General Electric Company, 100 Woodlawn, Pittsfield, Massachusetts, 01201. Dated March 3, 1969.

D000004-D000014 206 Author is I. Matelsky, Industrial Hygienist, General Electric Company, Nela Park, Cleveland, Ohio, 44112. Recipient is Dr. E.M. Kline, New York Office. Dated March 17, 1969.

D000015-D000030 207 Author is J.S. Nelson, Corporate Engineering. Recipient is unknown. Subject is PCB: An Industry Problem? Dated October 30, 1969.

D000031-D000040 208 Author is R.W. Lewis, General Electric Company, to Mr. A.N. Salazar, Executive Secretary, Power Equipment Division, Nema, 155 East 44th Street, New York, New York, 10017. Dated July 7, 1970.

D000041-D000042 209 Author is R.C. Rogers, District Sales Manager, Electronic Components Sales Operation, General Electric Company, 615 East Michigan Street, Milwaukee, Wisconsin, 53202. Recipient is Mr. H.R. Rowe, General Manager, McGraw Edison Power Systems Division, 12th and Madison Avenues, South Milwaukee, Wisconsin, 53172. Dated July 28, 1970.

D000043-D000048 210 Prepared by Corporate Staff, General Electric Company. Recipient is unknown. The use and disposal of electrical insulating liquids. Dated December 21, 1970.

D000049-D000161 211 General Electric documents from David Adams, et al. v. Kentucky Power, et al.

|                 |     |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D000162-D000163 | 212 | Special undertaking by purchasers of polychlorinated biphenyls signed by Monsanto Company as manufacturer and General Electric Company as buyer. Dated January 21, 1972.                                                                                                                                                                                                                                                                 |
| D000164         | 213 | Author is A. Pozefsky, Manager-Engineering, General Electric Company, John Street, Hudson Falls, New York, 12839. Recipient is miscellaneous utility companies dated August 12, 1972.                                                                                                                                                                                                                                                    |
| D000165         | 214 | Author is W.B. Papageorge, Chairman AMEI Committee C-107. Recipient is Dr. A. Pozefsky, General Electric Company, Industrial and Power Capacitor Products Department and Mr. E.L. Raab, General Electric Company Transformer Division. Dated May 2, 1973.                                                                                                                                                                                |
| D000166-D000176 | 215 | Author is James S. Nelson, Consultant-Product Environmental Compatibility, General Electric Company. Recipient is Dr. Martha Sager, Chairman, Affluent Standards and Water Quality Information Advisory Committee Environmental Protection Agency, Room 821, Crystal Mall, Building No. 2, Washington, D.C., 20460 re: affluent limitations for items on toxic substances list: economic impact of a ban on PCB dated November 21, 1973. |
| D000177-D000183 | 216 | Letter, dated 11/21/73. Author is Dr. E.L. Simons, Manager, Environmental Protection Operation, General Electric Company. Recipient is Dr. C. Hugh Thompson, Chairman Hazardous and Toxic Substance Regulation Task Force, Office of Water Program Operations, Environmental Protection Agency, Washington D.C., 20460                                                                                                                   |
|                 | 217 | [Reserved]                                                                                                                                                                                                                                                                                                                                                                                                                               |
| D000184-D000186 | 218 | Author is Stuart M. Richel, Attorney-Environmental Protection, General Electric Company. Recipient is Hearing Clerk, U.S. Environmental Protection Agency, Washington D.C., 20460. Dated January 15, 1974.                                                                                                                                                                                                                               |
| D000187-D000189 | 219 | General Electric Company, 877th meeting of the Board of Directors, New York, New York, September 12, 1975.                                                                                                                                                                                                                                                                                                                               |

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| D000190-D000191 | 220 | Author is John F. Welsh, Vice President, General Electric Company. Recipient is unknown. Dated January 14, 1976.                                                                                                                                                                                                                                                                               |
| D000192-D000204 | 221 | Administrative proceedings In Re General Electric Company, File No. 2833 (N.Y. Department of Environmental Conservation, February 9, 1976. <u>6 ELR 30007</u> )                                                                                                                                                                                                                                |
| D000205-D000209 | 222 | Spirometric Findings in Capacitor Workers Occupationally Exposed to Polychlorinated Biphenyls (PCBs) by Richard W. Lawton, M.D.; Marie R. Ross, R.N.; and Joseph Feingold, M.D. from Journal of Occupational Medicine/Volume 28, No. 6/June 1986.                                                                                                                                              |
| D000210-D000226 | 223 | Author is Clyde D. Keaton, Vice President and General Manager Domestic Apparatus and Engineering Services Division, General Electric Company. Dated June 4, 1985.                                                                                                                                                                                                                              |
| D000227-D000229 | 224 | United District Court Middle District of Florida Jacksonville Division. <u>Independent Life and Accident Insurance Company, a Florida corporation, Plaintiff, v. General Electric Company, a foreign corporation, Defendant.</u> Plaintiff Independent Life and Accident Insurance Companies Memorandum in Opposition to General Electric's Motion for Summary Judgment. Dated March 30, 1987. |
| D000230-D000247 | 225 | United States District Court Middle District of Florida Jacksonville Division. <u>Independent Life and Accident Insurance Company, a Florida corporation, Plaintiff, v. General Electric Company, a foreign corporation, Defendant.</u> Order Denying Defendant's Motion for Summary Judgment and Resetting Pre-trial Conference. Filed August 19, 1988.                                       |
| D000248         | 226 | Author is Fred W. Garrison, General Electric Company. Recipient is Donald G. Fabbi, Nevada Power Company. Dated February 15, 1989.                                                                                                                                                                                                                                                             |

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| D000249-D000354 | 227     | The United States District Court Middle District of Florida Jacksonville Division, <u>Independent Life and Accident Insurance Company, a Florida corporation, Plaintiff, v. General Electric Company, a foreign corporation, Defendant.</u> Deposition of Edward L. Bates taken December 11, 1986. |
| D000355-D000358 | 228     | U.S. Department of Labor Occupational Safety and Health Administration Material Safety Data Sheet. Manufacturer is General Electric Company. Date is unknown.                                                                                                                                      |
| D000359-D000362 | 229     | Data courtesy of Earl Dunham, G.E. Capacitor Products Department. Recipient is unknown re: composition of commonly used General Electric pyranol transformer dye electric fluids. Date is unknown.                                                                                                 |
| D000363-D000402 | 230     | Author is Transformer and Allied Product Divisions, General Electric, Pittsfield, Massachusetts, instructions GEH-1093B pyranol transformers and pyranol immersed current-limiting reactors. Recipient is unknown. Date is unknown.                                                                |
| D000403-D000405 | 231     | PCB Yearly Sales Totals, General Electric-All Locations All PCB Products 1954 through 1977.                                                                                                                                                                                                        |
| D000406-D000409 | 232     | Composition of Commonly Used General Electric Pyranol Transformer Dielectric Funds.                                                                                                                                                                                                                |
|                 | 233-283 | [Reserved]                                                                                                                                                                                                                                                                                         |
| E000001-E000011 | 289     | Author is Swan Chemical Company, Birmingham, Alabama, physical properties of the aroclors. Recipient is unknown. (From the files of WGK Laboratory.) Copyright 1934.                                                                                                                               |
| E000012-E000025 | 290     | Author is Cecil K. Drinker, M.D., dean and professor of physiology, Harvard School of Public Health, Boston, Massachusetts. Report to the Monsanto Chemical Company. Dated September 15, 1938.                                                                                                     |

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| E000026-E000035 | 291 | Author is Monsanto Chemical Co., organic division sales department, 800 North Del Mar Boulevard, St. Louis, Missouri. Recipient is unknown. Proper handling of aroclors and their mixtures in the electrical industry. Dated December 1, 1954. |
| E000036-E000045 | 292 | Author is E. Mather, process for the production of aroclors, pyranols, etc. at the Anniston and at the Wm. G. Krummrich Plant. Dated April, 1955.                                                                                              |
| E000046-E000048 | 293 | Author is R. Emmet Kelly, M.D. Recipient is Monsanto Chemical Company re: aroclor toxicity. Dated September 20, 1955.                                                                                                                          |
|                 | 294 | [Reserved]                                                                                                                                                                                                                                     |
|                 | 295 | [Reserved]                                                                                                                                                                                                                                     |
| E000049-E000076 | 296 | Author is Monsanto Chemical Company, organic chemicals division. Recipient is unknown. Technical bulletin O-124. Aroclor resins and plasticizers for chlorinated rubber. Dated May, 1957.                                                      |
| E000077-E000079 | 297 | Author is Elmer F. Wheeler, assistant director medical department, Monsanto Chemical Company. Recipient is H. Wilbur Spector, administrator industrial hygiene, Westinghouse Electric Corporation. Dated October 23, 1959.                     |
| E000080-        | 298 | Author is H. Wilbur Spector, administrator Westinghouse Electric Corporation. Recipient is Mr. Elmer P. Wheeler, assistant director, medical department, Monsanto Chemical Company. Dated April 25, 1962.                                      |
| E000081-E000082 | 299 | Author is Elmer P. Wheeler, assistant director medical department, Monsanto Chemical Company. Recipient is Mr. H. Wilbur Spector, administrator industrial hygiene, Westinghouse Electric Corporation. Dated April 30, 1962.                   |
| E000083-E000092 | 300 | Monsanto Askarel Inspection and Maintenance Guide revised September, 1963.                                                                                                                                                                     |

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|-----------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E000093-E000115 | 301 | Author is J.W. Molloy, production supervisor and R.G. Moody, production superintendent, Monsanto Chemical Company, Anniston, Alabama. Standard operating instructions for aroclors. Dated revised July, 1964. |
| E000116-E000117 | 302 | Minutes of Meeting of the Corporate Development Committee. Dated April 22, 1968.                                                                                                                              |
| E000118-E000120 | 303 | Author is Elmer P. Wheeler, manager environmental health, Monsanto Chemical Company. Recipient is Mr. Edward L. Raab, General Electric Company. Dated March 3, 1969.                                          |
| E000121-E000122 | 304 | Author is W.R. Richard - Research Center. Recipient is P. Benignus re: disposal and incineration of aroclor. Dated April 14, 1969.                                                                            |
| E000123-E000124 | 305 | Minutes of Meeting of the Corporate Development Committee. Dated April 28, 1969.                                                                                                                              |
| E000125-E000127 | 306 | Minutes of Meeting of the Corporate Development Committee. Dated November 17, 1969.                                                                                                                           |
| E000128-        | 307 | Author is unknown individual. From Monsanto Company. Recipient, form letter. Dated February 9, 1970.                                                                                                          |
| E000129-E000130 | 308 | Author is Donald A. Olson, director of sales functional fluids group, Monsanto Company. Recipient, form letter. Dated February 18, 1970.                                                                      |
| E000131-E000183 | 309 | Author is W.E. Schalk, director of sales plasticizers, Monsanto Company. Recipient, form letter. Dated February 19, 1970.                                                                                     |
| E000139-E000140 | 310 | Author is Emmet Kelly, M.D. Recipient is W.B. Papageorge Wpapa. Dated March 30, 1970.                                                                                                                         |
| E000141-        | 311 | Donald A. Olson, sales director functional fluids, Monsanto Company. Recipient is Mr. Garlington Wilburn, manager manufacturer, Westinghouse Electric Corporation. Dated May 4, 1970.                         |

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| E000142-E000143 | 312 | Minutes of Meeting of the Corporate Management Committee. Dated April 20, 1970.                                                                                                                                                         |
| E000144-E000147 | 313 | Author is E.V. John, public relations department, Monsanto Company. News release, Monsanto cites actions taken on environmental issue. Dated July 16, 1970.                                                                             |
| E000148-E000149 | 314 | Author is W.B. Papageorge, manager environmental control, Monsanto Company. Recipient is Mr. Fred R. Viland, senior buyer, Westinghouse Electric Corporation, 469 Sharpesville Avenue, Sharon, Pennsylvania 16146. Dated July 27, 1970. |
| E000150-E000151 | 315 | Author is Paul G. Benignus, market manager di-electric fluids, Monsanto Company. Recipient is unknown. Dated August 6, 1970.                                                                                                            |
| E000152-        | 316 | Author is James G. Bryant, product specialist dielectric fluids, Monsanto Company. Recipients, form letter. Dated September 15, 1970.                                                                                                   |
| E000153-E000549 | 317 | Miscellaneous Monsanto documents from David Adams, et al. v. Kentucky Power, et al.                                                                                                                                                     |
| E000550-E000565 | 318 | Author is U.S. Department of Labor, material safety data sheet. Manufacturer-Monsanto Company (aroclor 1242). Dated January, 1972.                                                                                                      |
| E000566-E000577 | 319 | U.S. Department of Labor material safety data sheet. Manufacturer-Monsanto Company (pyranol A13B3B-2). Dated January, 1972.                                                                                                             |
| E000578-E000589 | 320 | U.S. Department of Labor material safety data sheet. Manufacturer-Monsanto Company (inerteen 100-42). Dated January, 1972.                                                                                                              |
| E000590-E000595 | 321 | Cover sheet from Monsanto Industrial Chemicals Company sales offices with U.S. Department of Labor material safety data sheets attached.                                                                                                |
| E000596-E00598  | 322 | Congressional Record-House. Dated July 26, 1971.                                                                                                                                                                                        |

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| E000599-E000614 | 323 | Author is W.B. Papageorge. Monsanto's PCB program presented at ANSI committee C-107 meeting-September 14, 1971.                                                                    |
| E000615-E000621 | 324 | Author is Renate D. Kimbrough, M.D., Environmental Protection Agency. Recipient is Dr. George Levinskis, Monsanto Company. Dated October 14, 1971.                                 |
| E000622-E000833 | 325 | Monsanto documents: Volume II [pages 262-522]. In re Glen Brown, et al., Plaintiffs, v. Monsanto Company, Defendant. Dated November, 1971.                                         |
| E000884-E00114  | 326 | Report to Monsanto Company two year chronic oral toxicity with aroclor 1260 in albino rats. Dated November 12, 1971.                                                               |
| E001145-E001151 | 327 | Author is R.M. McCutchan, Monsanto Industrial Chemicals Company, functional products group, standard manufacturing process for aroclors. Department 246. Dated January, 1972.      |
| E001152-        | 328 | Author is Howard S. Bergen, Jr., director specialty products group, Monsanto Industrial Chemicals Company. Recipient is Westinghouse Electric Corporation. Dated January 20, 1972. |
| E001153-E001155 | 329 | Author is Westinghouse General Electric Corporation (vice president). Recipient is Monsanto Company, E.J. Putzell. Dated January 15, 1972.                                         |
| E001156-        | 330 | Author is Howard S. Bergen, Jr., director specialty products group, Monsanto Company. Recipient is Westinghouse Electric Corporation. Dated January 20, 1972.                      |
| E001157-E001158 | 331 | Author is Monsanto Company. Special undertaking by purchasers or polychlorinated biphenyls. Recipient is General Electric Co. Dated January 21, 1972.                              |
| E001159-E001160 | 332 | Author is Howard Bergen, director specialty products group, Monsanto Industrial Chemicals Company. Recipient, form letter. Dated February 4, 1972.                                 |

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| E001161         | 333 | Author is T.L. Gossage, marketing director specialty products group, Monsanto Industrial Chemicals Company. Recipient is unknown, form letter. Dated February 17, 1972.                                     |
| E001162-        | 334 | Author is T.L. Gossage, marketing director specialty products, Monsanto Industrial Chemicals Company. Recipient is plant engineer (form letter). Dated February 28, 1972.                                   |
| E001163-E001164 | 335 | Author is W.R. Corey, director functional product group. Recipient is Mr. Paul Defalco, Jr., regional administrator, U.S. Environmental Protection Agency. Dated March 3, 1972.                             |
| E001165-E001167 | 336 | Author is T. Katayama. Recipient is P.G. Benignus re: PCB in Japan. Dated March 22, 1972.                                                                                                                   |
| E001168-E001169 | 337 | Author is W.B. Papageorge, manager Environmental Protection, Monsanto Company. Recipient, form letter. Dated April, 1972.                                                                                   |
| E001170-E001197 | 338 | Author is W.B. Papageorge, E.S. Tucker, R.H. Munch and C. Poton. Presentation to the inter-departmental task force on PCB's. Washington, D.C. Dated May 15, 1972.                                           |
| E001198-        | 339 | Author is Howard S. Bergen, Jr., director specialty products group, Monsanto Company. Recipient is McGraw Edison Power Systems Division. Dated June 6, 1973.                                                |
| E001199-E001204 | 340 | W.B. Papageorge, manager product acceptability, Monsanto Company. Recipient is Dr. Martha Sager, chairman of effluent standards and water quality information advisory committee, EPA. Dated July 13, 1973. |
| E001205-E001224 | 341 | Minutes of Meeting on proposed PCB affluent standards - Monsanto Company. Dated February 28, 1974.                                                                                                          |

E001225- 342 Author is Phocions. Park Senior Attorney, Monsanto Company. Recipient is Mrs. Betty J. Billings, hearing clerk, Environmental Protection Agency. Dated March 12, 1974.

E001226-E001240 343 Affidavit of W.B. Papageorge, Monsanto Company in re: proposed toxic pollutant affluent standards for Aldrindieldrin, et al. - FWPCA (307) - docket no. 1. Dated March, 1974.

E001241- 344 Author is W.B. Papageorge. Recipient, numerous individuals. PCB's-Minutes of Meeting with NIOSH - 11/22/74. Dated December 9, 1974.

E001242-E001243 345 Author is Dan A. Albert, staff supervisor, personnel relations, Westinghouse Electric Corporation. Recipient is Dr. W.B. Papageorge, manager environmental control, Monsanto Company. Dated February 3, 1975.

E001244-E001245 346 Author is W.B. Papageorge, manager, product acceptability special and processed chemicals. Recipient is Mr. Dan A. Albert, staff supervisor, personal relations, Westinghouse Electric Corporation. Dated February 26, 1975.

E001246-E001253 347 Author is W.B. Papageorge, manager, product acceptability specialty and process chemicals. Recipient is Mr. Dan A. Albert, staff supervisor, personal relations, Westinghouse Electric Corporation. Dated March 18, 1975.

E001253 348 Author is W.B. Papageorge, manager, product acceptability specialty and process chemicals. Recipient is H.R. Ford - 1070 re: Westinghouse - inerteen. Dated March 18, 1975.

E001254-E001257 349 Author is Monsanto Company. Recipient is unknown. Transformer askarel inspection and maintenance guide. Date: revised March, 1975.

E001258-E001263 350 Author is J.C. Calandra, president. Recipient is Dr. George Roush, Jr., Monsanto Company. Dated April 18, 1975.

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| E001264-E001270 | 351 | Author is Monsanto Industrial Chemicals Co. Recipient is unknown. Dated June 10, 1975.                                                                                                                                                                                     |
| E001271-E001273 | 352 | Author is George J. Levinskas, Ph.D., manager environmental assessment and toxicology. Recipient is Dr. J.C. Calandra, industrial bio-test laboratories. Dated July 18, 1975.                                                                                              |
|                 | 353 | [Reserved]                                                                                                                                                                                                                                                                 |
| E001274-        | 354 | Author is J.C. Calandra. Recipient is Dr. George J. Levinskas, manager environmental assessments and toxicology, Monsanto Company. Dated August 4, 1975.                                                                                                                   |
| E001275-E001276 | 355 | Author is Monsanto Industrial Chemicals Co. Recipient is unknown. Re: Aerocorp 1254. Dated August 5, 1975.                                                                                                                                                                 |
| E001277-E001280 | 356 | Author is George E. Mercier. Recipient is unknown. Monsanto meeting. Dated September 4, 1975.                                                                                                                                                                              |
| E001281-E001287 | 357 | Author is Stanley W. Legro, assistant administrator for enforcement, United States Environmental Protection Agency. Recipient is Monsanto Industrial Chemicals Co. Dated October 17, 1975.                                                                                 |
| E001288-E001298 | 358 | Author is David Wood, Monsanto Company. Recipient is W.B. Papageorge, Monsanto Company. Dated October 30, 1975.                                                                                                                                                            |
| E001299-E001315 | 359 | Author is Office of Occupational Health Surveillance and Biometrics. National Institute for Occupational Safety and Health. Re: Background Information on Polychlorinated Biphenyls. Dated November 3, 1975.                                                               |
| E001316-E001317 | 360 | Author is Harvey P. Stein, Ph.D., Chemist, Priorities Evaluation Branch. Office of Occupational Health, Surveillance and Biometrics. Recipient is Mr. W.B. Papageorge, Specialty and Process Chemicals Division, Monsanto Industrial Chemicals Co. Dated November 4, 1975. |

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| E001318-E001322 | 361 | Author is J. Coleman Weber, Monsanto Company. Recipient, several individuals from Monsanto Company. Dated November 17, 1975.                                                                                                                       |
| E001323-E001322 | 362 | Author is W.B. Papageorge, manager product acceptability process chemicals division, Monsanto Company. Recipient is Mr. Earl J. Stephenson, director enforcement division, United States Environmental Protection Agency. Dated December 11, 1975. |
| E001333-E001334 | 363 | Author is Monsanto Company, news release. Dated December 17, 1976.                                                                                                                                                                                 |
| E001335-E001336 | 364 | Author is F.J. Fitzgerald, vice president, Monsanto Chemical Company. Recipient is unknown. Dated January 14, 1976.                                                                                                                                |
| E001337-E001339 | 365 | Author is Monsanto Company. Recipient is unknown. Transformer askarel inspection and maintenance guide. Dated, revised August, 1976.                                                                                                               |
| E001340-E001347 | 366 | Author is J.A. Alley, industry specialist Di-Electrics, Monsanto Company. Recipient is Mr. Dick Jones, senior buyer, Westinghouse Electric Corporation. Dated September 22, 1977.                                                                  |
| E001348-E001361 | 367 | Author is Judith A. Zack and David C. Musch. Recipient is unknown. Mortality of PCB workers at the Monsanto plant in Sauget, Illinois. Dated December 14, 1979.                                                                                    |
| E001362-E001365 | 368 | Author is Howard Bergen, director specialty products group, Monsanto Industrial Chemicals Co. Recipient, form letter. Date unknown.                                                                                                                |
| E001366-E001369 | 369 | Polychlorinated biphenyl and polychlorinated terphenyl products, Monsanto Industrial Chemicals Co. 1971-1975.                                                                                                                                      |
| E001370-E001376 | 370 | Products containing polychlorinated biphenyls and/or polychlorinated terphenyls sold in 1971.                                                                                                                                                      |

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| E001377-E001380 | 371 | Products containing polychlorinated biphenyls and/or polychlorinated terphenyls production (thousands of pounds).                                                                                             |
| E001381-E001387 | 372 | Products containing polychlorinated biphenyls and/or polychlorinated terphenyls sold in 1971.                                                                                                                 |
| E001388-E001891 | 373 | Products containing polychlorinated biphenyls and/or polychlorinated terphenyls production - Anniston, Alabama.                                                                                               |
| E001392-E001893 | 374 | Products containing polychlorinated biphenyls and/or polychlorinated terphenyls production - Sauget, Illinois.                                                                                                |
| E001394-E001410 | 375 | Special October, 1980 grand jury charge In re United States of America v. Joseph C. Calandra, Moreno L. Keplinger, Paul L. Wright and James B. Plank.                                                         |
| E001411-E001430 | 376 | Author is William R. Gaffey, Ph.D., manager epidemiology, Monsanto Company. Recipient is Mr. David P. Brown, assistant chief, industry-wide studies branch Niosh. Dated September 15, 1982.                   |
| E001431-E001446 | 377 | Author is W.R. Gaffey, Ph.D., Chapter 20 "The Epidemiology of PCB's". From PCB's: human and environmental hazards by F.M. D'Itri, M.A. Kamrin. Dated 1983.                                                    |
| E001448-        | 378 | Author is Terry L. Leet, Monsanto Company. Recipient is David P. Brown, national institute for occupational safety and health. Robert A. Taft Laboratories. Dated February 27, 1985.                          |
| E001449-E001451 | 379 | Affidavit in Support of Motion to Server by Thomas M. Bistline <u>In re Glenn Brown, et al., Plaintiffs v. Monsanto Company, Defendant.</u> In the Circuit Court of the City of St. Louis, State of Missouri. |
| E001452-E001486 | 380 | Volume XIV, Transcript of Cecil Scott, et al. v. Monsanto Company in the United States District Court for the Eastern District of Texas, Beaumont division. Dated September 3, 1987.                          |

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| E001487-E001490 | 381 | Abstract of testimony of Phillip S. Smith. <u>In re Cecil Scott, et al. v. Monsanto Company.</u> Dated September 3, 1987.                                                                                                             |
| E001491-E001512 | 382 | Volume XIII, Transcript <u>In re Cecil Scott, et al. v. Monsanto Company</u> in the United States District Court for the Eastern District of Texas, Beaumont division. Dated September 2, 1987.                                       |
| E001513-E001553 | 383 | Complaint filed <u>In re Monsanto Company, Plaintiff v. Aetna Casualty and Surety Company, et al.</u> filed January 20, 1988.                                                                                                         |
| E001554-E001563 | 384 | [Reserved]                                                                                                                                                                                                                            |
| E001565-E001589 | 385 | Deposition of Mark H. Reddaway <u>In re Nevada Power Company v. Monsanto Company</u> in the United States District Court, District of Nevada. Dated December 4, 1989.                                                                 |
| E001590-E001595 | 386 | Author is Carl G. Gustafson, Federal Water Quality Administration. Article entitled "PCB's - Prevalent and Persistent". Dated October, 1970.                                                                                          |
| E001596-E001598 | 387 | Certificate of Non-Arbitration <u>In re Monsanto Company, Plaintiff v. Aetna Casualty &amp; Surety Company, et al.</u> in the Superior Court of the State of Delaware in and for New Castle County. Dated January 20, 1988.           |
| E001499-E001615 | 388 | Special October, 1980 grand jury charge In re United States of America v. Joseph C. Calandra, Moreno L. Keplinger, Paul L. Wright and James B. Plank.                                                                                 |
| E001616-E001634 | 389 | Author is Judith A. Zack, M.P.H. and David C. Musch, M.P.H., Ph.D. Monsanto Company Department of Medicine and Environmental Health. A retrospective mortality study of polychlorinated biphenyl manufacturing workers. Date unknown. |
| E001635-E001636 | 390 | Excerpt from Brief. Date unknown.                                                                                                                                                                                                     |
| E001637-E001656 | 391 | Author is Monsanto Company. Transformer askarel inspection and maintenance guide. Date unknown.                                                                                                                                       |

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| E001657-E001658 | 392 | Special Undertaking by Purchasers of Polychlorinated Biphenyls.                                                                                                             |
| E001659-E001663 | 393 | Documents re: failure to warn of adverse health effects attendant to exposure to PCB's <u>In re David Adams, et al. v. Kentucky Power, et al.</u> Date unknown.             |
| E001664-E001667 | 394 | Production and Sales of polychlorinated biphenyls, Monsanto Industrial Chemicals Company. Date unknown.                                                                     |
| E001668-E001677 | 395 | Author is P.G. Benignus, Monsanto Industrial Chemicals Company. The proper handling of aroclors and their mixtures in the electrical industry. Date, revised January, 1960. |
| E001678-E001684 | 396 | Monsanto - Askarel Inspection & Maintenance Guide.                                                                                                                          |
| E001685-E001686 | 397 | Special Undertaking by Purchasers of Polychlorinated Biphenyls.                                                                                                             |
| E001687-E001694 | 398 | Author is R.A. Lidgett and H.A. Vodden. Recipient is unknown. Date unknown. (7/27/70).                                                                                      |
| E001695-E001697 | 399 | Author is unknown. Report to the January meeting of the Board of Directors on the status of PCB implementation program. Date unknown.                                       |
|                 | 400 | [Reserved]                                                                                                                                                                  |
| E001698-E001699 | 401 | Unidentified excerpt.                                                                                                                                                       |
| 1-3             | 402 | Special verdict in Stroh Die Casting Company, Plaintiff, vs. Monsanto Company, Defendant, filed May 17, 1991.                                                               |
| 4-5             | 403 | Chlorodibenzofurans in PCBs compiled 10/03/79.                                                                                                                              |
| 6-7             | 404 | Memo from R.J. Caley, II, to R.E. Keller TIB re: fifth annual symposium on recent advances in the analytical chemistry of pollutants - trip report dated May 27, 1975.      |
| 8               | 405 | Memo from J.P. Mieure/Monsanto to W.B. Papageorge re: FDA detection of chlorinated dibenzofurans in aroclor dated December 3, 1974.                                         |

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| 9-10   | 406 | Handwritten letter from Otis/Industrial Biotest Laboratories, Inc. to Don dated January 14, 1972.                                                                                               |
| 11-12  | 407 | Letter from W.B. Papageorge, Manager Environmental Protection, to Dr. Donald J. Baumgartner, National Environmental Research Center EPA dated December 6, 1971.                                 |
| 13-16  | 408 | Memo from R.E. Keller/Monsanto to W.R. Richard, General Offices, re: alleged dioxens and benzofurans in PCBs-inputs for report dated October 28, 1971.                                          |
| 17-20  | 409 | Memo from C.L. Bradford and N.T. Johnson/ Monsanto Company to T.L. Gossage re: chlorinated terphenyls dated November 17, 1971.                                                                  |
| 21-36  | 410 | Monsanto's PCB program presented at ANSI committee C-107 meeting-September 14, 1971 by W.B. Papageorge.                                                                                         |
| 37-44  | 411 | Monsanto Company Organic Chemicals Division standard manufacturing process for hydropydraul A-200 Department 259, hydrol 280 Department 259 prepared by R.M. McCutchan approved December, 1970. |
| 45-55  | 412 | Analysis of possible effects on customers and Monsanto if production and distribution of hydrol fluids containing PCBs is stopped. Author is unidentified. Undated.                             |
| 56-60  | 413 | Draft of a letter from Elmore P. Wheeler to W.B. Papageorge re: further toxicity research-aroclors and substitutes dated October 19, 1970.                                                      |
| 61-73  | 414 | Memo from W.B. Papageorge, Monsanto Company, to Distribution List re: PCB environmental problem status report dated October 6, 1970.                                                            |
| 74-76  | 415 | Letter from W.B. Papageorge to Mr. Jenkins dated July 8, 1970.                                                                                                                                  |
| 77     | 416 | Letter from Elmore P. Wheeler to Otis E. Fancher dated May 25, 1970.                                                                                                                            |
| 78-101 | 417 | Memo from John Mason/Monsanto to H.S. Bergen and J.E. Springgate dated May 11, 1970.                                                                                                            |

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| 102-119 | 418 | Memo from N.T. Johnson to Distribution List re: pollution letter dated February 16, 1970.                                         |
| 120     | 419 | Memo from W.B. Papageorge to R. Savage dated October 26, 1970.                                                                    |
| 121     | 420 | Memo from Emmet Kelly to W.B. Papageorge dated March 30, 1970.                                                                    |
| 122-124 | 421 | Minutes of meeting of the corporate development committee dated November 17, 1969.                                                |
| 125-148 | 422 | PCB environmental pollution abatement plan rough draft dated 11/10/59.                                                            |
| 149-152 | 423 | Executive summary PCB pollution dated 10/29/69.                                                                                   |
| 153-160 | 424 | Memo from W.R. Richard to E. Wheeler re: defense of aroclor-F. fluids dated September 9, 1969.                                    |
| 161-166 | 425 | Minutes of aroclor "ad hoc" committee first meeting dated September 5, 1969, Resolution of Board of Directors dated May 26, 1969. |
| 167-168 | 426 | Memo from Tom C. Ford to Bergen, Richard, and Wheeler dated May 8, 1969.                                                          |
| 169     | 427 | Memo from Elmer P. Wheeler to W.R. Richard dated April 8, 1969.                                                                   |
| 170-172 | 428 | Memo from W.R. Richard to E. Wheeler dated March 6, 1969.                                                                         |
| 173-176 | 429 | Aroclor wildlife project dated December 1968.                                                                                     |
| 177-178 | 430 | Memo from W.R. Richard to W.A. Kuhn dated December 30, 1968.                                                                      |
| 179     | 431 | Memo from W.R. Richard-Research Center to Wheeler dated December 9, 1968.                                                         |
| 180     | 432 | Memo from C. Paton to W.R. Richard (re: U.S. Bureau of Commercial Fisheries/aroclors, dated June 18, 1968.                        |

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| 181     | 433 | Letter from Richard A. Wilson, Sr.,<br>Research Chemist, United States<br>Department of Interior, Fish and<br>Wildlife Service to Monsanto Chemical<br>Company dated January 16, 1968.             |
| 182-183 | 434 | Letter from William Randolph, Bureau of<br>Science Department of Health, Education<br>and Welfare Food and Drug Administration<br>to Dr. William Emmet, Monsanto Company<br>dated January 3, 1967. |
| 184-187 | 435 | Letter from D. Wood to George Buchanan<br>dated December 1, 1966.                                                                                                                                  |
| 188-189 | 436 | Letter from Jack T. Garrett to Mr. S.<br>Facini dated August 29, 1960.                                                                                                                             |
| 190-193 | 437 | Tentative process for continuous<br>chlorination of biphenyl Monsanto<br>Chemical Company written by R.A. Simone<br>dated March 23, 1956.                                                          |
| 194     | 438 | Memo from Jack T. Garrett to H.B.<br>Patrick dated November 14, 1955.                                                                                                                              |
| 195-196 | 439 | Letter from R. Emmet Kelly to Dr. J.W.<br>Barrett dated September 20, 1955.                                                                                                                        |
| 197     | 440 | Letter from Emmet Kelly to Mr. Newman<br>dated February 12, 1954.                                                                                                                                  |
| 198     | 441 | Letter from L.W. Spolyar, Director,<br>Division of Industrial Hygiene Indiana<br>State Board of Health to Dr. R. Emmet<br>Kelly, Monsanto Company dated<br>February 28, 1950.                      |
| 199     | 442 | Letter from L. Spolyar, M.D., Director,<br>Division of Industrial Hygiene Indiana<br>State Board of Health to Toxicology<br>Department Monsanto Company dated<br>February 6, 1950.                 |
| 200-201 | 443 | PCB manufacturing and sales Monsanto<br>Industrial Chemical Company 1957 through<br>1978.                                                                                                          |
| 202-213 | 444 | Affidavit of Dr. Barry Commoner dated<br>February 16, 1990.                                                                                                                                        |
| 214-215 | 445 | Affidavit of John C. McCarthy dated<br>February 20, 1990.                                                                                                                                          |

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| 216       | 446 | Date Line Muncie Plant dated March 3, 1989.                                                                                                     |
| 217-262   | 447 | Selected bibliography of journal articles medical and industrial studies prior to 1956.                                                         |
| 263-623   | 448 | Proceedings: 1981 PCB Seminar.                                                                                                                  |
| 624-1143  | 449 | Proceedings: 1983 PCB Seminar.                                                                                                                  |
| 1144-1550 | 450 | Proceedings: 1985 EPRI PCB Seminar.                                                                                                             |
| 1551-1994 | 451 | Proceedings: 1987 EPRI PCB Seminar.                                                                                                             |
| 1995-2050 | 452 | Pyranol characteristics of transformer, regulator and capacitor pyranol by General Electric.                                                    |
| 2051-2066 | 453 | General Electric technical information series dated 5/16/74.                                                                                    |
| 2067-2086 | 454 | General Electric technical information series dated 1/2/73.                                                                                     |
| 2087-2117 | 455 | Insulating materials for design and engineering practice by Frank M. Clark, copyright 1962.                                                     |
| 2118-2127 | 456 | PCB: An Industry Problem? by J.S. Nelson dated October 30, 1969.                                                                                |
| 2128-2130 | 457 | Form letter from Donald A. Olson, Director of Sales Functional Fluids Group, Monsanto Company dated February 18, 1970.                          |
| 2131-2133 | 458 | Open letter to industrial customers from General Electric Company undated.                                                                      |
| 2134-2137 | 459 | C & P list structure for pyranol mailing.                                                                                                       |
| 2138-2139 | 460 | Letter from Mr. Raab, Manager Chemical and Processes Section to Mr. Donald Olson, Monsanto Company dated July 1, 1970.                          |
| 2140-2143 | 461 | Caution labels for can and drummed pyranol.                                                                                                     |
| 2144-2147 | 462 | Letter from John F. McAllister, Manager Product Safety and Reliability, General Electric to Division General Managers dated September 21, 1970. |

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| 2148-2161                | 463 | The use and disposal of electrical insulating liquids subcouncil report dated June, 1971, National Industrial Pollution Control Counsel.                                                         |
| 2162-2175                | 464 | The Need for continued use of polychlorinated biphenyls as electrical insulating liquids dated January 5, 1972 by Electric and Nuclear Subcouncil National Industrial Pollution Control Counsel. |
| 2176-2277                | 465 | Polychlorinated biphenyls and the environment, Interdepartmental Task Force on PCBs dated May, 1972.                                                                                             |
| 2278-2350                | 466 | Polychlorinated biphenyls and the environment, Interdepartmental Task Force on PCBs COM-72-10419 dated May 1972.                                                                                 |
| 2351-2382                | 467 | The role of polychlorinated biphenyls in electrical equipment by General Electric Company dated February 4, 1972.                                                                                |
| 2383                     | 468 | Letter from R.W. Lewis, General Electric Company, to Mr. Salazar, Executive Secretary, Power Equipment Division NEMA dated July 7, 1970.                                                         |
| 2384-2418,<br>for 771841 | 469 | American National Standard Guidelines handling and disposal of capacitor and transformer grade askorals containing polychlorinated biphenyls.                                                    |
| 2419-2449                | 470 | Miscellaneous hazard number 2581 report on liquid di-electric and cooling mediums by General Electric Company dated September 29, 1934.                                                          |
| 2450-2451                | 471 | Recommendation to the Electrical and Fire Councils of Underwriters Laboratory re: guide number 540I4 September 29, 1934.                                                                         |
| 2452-2460                | 472 | Report on liquid di-electric and cooling medium add mixed with small amounts of transformer oil by General Electric Company dated February 18, 1937.                                             |
| 2461-2469                | 473 | 1935 National Electrical Code for electric wiring and apparatus.                                                                                                                                 |
| 2470-2482                | 474 | 1947 National Electrical Code for electric wiring and apparatus.                                                                                                                                 |

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| 2483-2490 | 475 | Instructions for searching lists of serial numbers for PCB transformers.                                                                                                   |
| 2491-2630 | 476 | Toxicological profile for selected PCBs draft received December 17, 1987 by Washington Occupational Health Associates, Inc.                                                |
| 2631-2648 | 477 | Human health effects of polychlorinated biphenyls and polybrominated biphenyls by Renate Kimbrough dated 1987.                                                             |
| 2649-2678 | 478 | Human health effects of electrical grade PCBs by Brown, Coe, and Pocock, General Electric Company, dated August, 1981.                                                     |
| 2679-2684 | 479 | Human exposure to polychlorinated biphenyls at toxic waste sites: investigations in the United States by Paul A. Stehr-Green, Virlyn W. Burse and Edith Welty.             |
| 2685-2717 | 480 | Corporate research and development follow-up study of capacitor workers exposed to PCBs by R.W. Lawton, M.R. Ross, and J. Feingold dated April, 1986.                      |
| 2718-2742 | 481 | Effects of PCB exposure on biochemical and hematological findings in capacitor workers by Lawton, Ross, Feingold and Brown.                                                |
| 2743-2794 | 482 | The relation of occupational polychlorinated biphenyls exposure to cancer and total mortality by Taylor, Stelma, Auger and Lawrence dated April 11, 1988.                  |
| 2795-2796 | 483 | Letter from Phillip R. Taylor, Department of Health and Human Services to Marie Ross, R.N., Medical Department, General Electric Capacitor Division, dated April 26, 1988. |
| 2797-2799 | 484 | Resume of Marie R. Ross, R.N., C.O.H.N., Supervisor, Occupational Health and Nursing, General Electric Company, Capacitor and Power Protection Operation.                  |
|           | 485 | [Reserved]                                                                                                                                                                 |

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| 2800-2805 | 486 | Letter from Charles S. Cassis to Thomas E. Kotoske re: David Adams, et al. v. Kentucky Power, et al. revised list of exhibits dated January 27, 1989.                                    |
| 2806-2899 | 487 | Westinghouse Inerteen transformers instruction book.                                                                                                                                     |
| 2900-2907 | 488 | Westinghouse Electric Corporation instructions for Inerteen insulating fluid P.D.S. 54201CM and installation and maintenance of Inerteen transformers effective September, 1968.         |
| 2908-2924 | 489 | Westinghouse Electric Corporation instructions for handling Inerteen insulating fluid P.D.S. 54201CM and installation and maintenance of Inerteen transformers effective August, 1971.   |
| 2925-2941 | 490 | Westinghouse Electric Corporation instructions for handling Inerteen insulating fluid P.D.S. 54201CM and installation and maintenance of Inerteen transformers effective February, 1976. |
| 2942-2962 | 491 | Westinghouse Electric Corporation instructions for handling Inerteen insulating fluid P.D.S. 54201CM and installation and maintenance of Inerteen transformers effective June, 1976.     |
| 2963-2994 | 492 | The Epidemiology of PCBs by William R. Gaffey, Monsanto Company dated September 15, 1981.                                                                                                |
| 2995-3007 | 493 | Appendix D - Occurrence, Transfer and Cycling of PCBs in the Environment.                                                                                                                |
| 3008-3025 | 494 | Appendix B - Use and Replacability of PCBs.                                                                                                                                              |
| 3026-3030 | 495 | Appendix C - The Need for Continued Use of PCBs as Electrical Insulating Liquids.                                                                                                        |
| 3031-3041 | 496 | Appendix H - Regulatory Action on PCBs.                                                                                                                                                  |
| 3042-3058 | 497 | Table 13 - Possible Future Studies Involving PCBs, Their Individual Isomers and Contaminants.                                                                                            |
| 3059-3064 | 498 | Aroclor Figures.                                                                                                                                                                         |

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| 3065-3066 | 499 | Appendix A - Chemical and Physical Properties of PCBs.                                                                                                                    |
| 3067-3070 | 500 | Appendix E - Occurrence and Sources of PCBs in Food.                                                                                                                      |
| 3071-3077 | 501 | Findings, Conclusions and Recommendations.                                                                                                                                |
| 3078-3080 | 502 | Index of Tables.                                                                                                                                                          |
| 3081-3112 | 503 | Aroclor Semi-Continuous Activated Sludge Primary Degradation Studies.                                                                                                     |
| 3113-3121 | 504 | What Happens to PCBs in the Environment by Dr. R. H. Munch.                                                                                                               |
| 3122-3139 | 505 | Monsanto PCB Actions by Dr. C. Paton.                                                                                                                                     |
| 3140-3141 | 506 | Summary by W. B. Papageorge.                                                                                                                                              |
| 3142-3537 | 507 | National Conference on Polychlorinated Biphenyls sponsored by Environmental Protection Agency dated March 1976.                                                           |
| 3538-3542 | 508 | Representations of the Concentrations of PCBs.                                                                                                                            |
| 3543-3549 | 509 | Recent Studies of Transport of PCBs to Marine Environments by Robert W. Riseborough.                                                                                      |
| 3550-3557 | 510 | Uptake of Three Polychlorinated Biphenyls, DDT and DDE by the Green Sunfish by James R. Sanborn, PhD., William F. Childers, and Robert L. Metcalf.                        |
| 3558-3569 | 511 | Laboratory Model Echo System Studies of the Degradation and Fate of Radio Labelled, Tri, Tetra, and Penta Chloro Biphenyl compared with DDT by Robert L. Metcalf, et, al. |
| 3570-3574 | 512 | Environmental Transport and Occurrence of PCBs in 1975 by Ian C. T. Nisbet, PhD.                                                                                          |
| 3575-3583 | 513 | Ecological Effects and Exposure by Donald I. Mount, PhD. dated November 20, 1975.                                                                                         |
| 3584-3598 | 514 | Pre 1972 Knowledge of Non-Human Effects of Polychlorinated Biphenyls by Charles R. Walker.                                                                                |

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| 3599-3619 | 515 | PCBs: Effects On and Accumulation by Estuarine Organisms by David J. Hanson.                                                                                                                  |
| 3620-3664 | 516 | Submission To The Subcommittee on Oversight and Investigations of the Committee on Interstate and Foreign Commerce U.S. House of Representatives by Monsanto Company dated November 16, 1979. |
| 3665-3689 | 517 | Polychlorinated Biphenyls a Report on Uses, Environmental and Health Effects and Disposal Monsanto Company dated 1978.                                                                        |
| 3690-3698 | 518 | Actions served on Monsanto alleging polychlorinated biphenyls use in dye electric fluids.                                                                                                     |
| 3699-3761 | 519 | Aroclors Physician Properties and Suggested Applications.                                                                                                                                     |
| 3762-3774 | 520 | Adsorptive Refining of Askarel Fluids Monsanto Company.                                                                                                                                       |
| 3775-3783 | 521 | In line measurement of electrical properties for flowing dielectrics Monsanto Company.                                                                                                        |
| 3784-3796 | 522 | Monsanto advertisement flier entitled When You Want Fire Safety, Reliability and Minimum Maintenance Specify Askarel Type Transformers.                                                       |
| 3797-3799 | 523 | Monsanto Company design details for moisture protection of liquid insulation transformers.                                                                                                    |
| 3800-3816 | 524 | Monsanto Company care and grooming of askarel transformer fluid.                                                                                                                              |
| 3817-3850 | 525 | Monsanto Company askarel inspection and maintenance guide.                                                                                                                                    |
| 3851-3876 | 526 | Application data bulletin no. P-115 entitled The Aroclors Physical Properties and Suggested Applications Monsanto Company.                                                                    |
| 3877-3905 | 527 | Monsanto Company transformer askarel inspection and maintenance guide.                                                                                                                        |
| 3906-3939 | 528 | Monsanto Company askarel inspection and maintenance guide.                                                                                                                                    |

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| 3940-3962 | 529 | Technical bulletin the aroclor polychlorinated polyphenyls di-electrics for capacitors and transformers Monsanto Company.              |
| 3963-3994 | 530 | Monsanto Company the aroclors physical properties and suggested applications application data bulletin no. P-115.                      |
| 3995-4000 | 531 | Monsanto fluids for specialized engineering.                                                                                           |
| 4001-4013 | 532 | Monsanto sample book entitled Here's How to Get More Performance and Save Money When Specifying Transformers dated 08/67.              |
| 4014-4108 | 533 | Monsanto Company radiation resistant fluids.                                                                                           |
| 4019-4099 | 534 | Monsanto Company application data bulletin no. P-115 The Aroclors Physical Properties and Suggested Applications.                      |
| 4100-4124 | 535 | Monsanto Company technical bulletin The aroclor polychlorinated polyphenyls.                                                           |
| 4125-4208 | 536 | The proper handling of aroclors and their mixtures in the electrical industry.                                                         |
| 4209-4253 | 537 | Monsanto askarel maintenance and inspection guide.                                                                                     |
| 4254-4276 | 538 | The aroclors physical properties and suggested applications application data bulletin no. P-115 Monsanto Company.                      |
| 4277-4306 | 539 | Monsanto Company the aroclors physical properties and suggested applications.                                                          |
| 4307-4339 | 540 | Monsanto Company askarel inspection and maintenance guide - Allischalmers.                                                             |
| 4340-4454 | 541 | The Proper Handling of Aroclors and Their Mixtures in the Electrical Industry by P.G. Benignus Monsanto Company revised January, 1960. |
| 4455-4465 | 542 | Physical Properties of the Aroclors by the Swann Chemical Company copyright 1932.                                                      |
| 4466-4498 | 543 | The Aroclors Physical Properties and Suggested Applications application data bulletin no. 0-P-115.                                     |

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| 4499-4547 | 544 | The Aroclor Compounds Monsanto Company.                                                                                                                        |
| 4548-4594 | 545 | The Aroclors Physical Properties and Suggested Applications Monsanto Company "Here's How to Get More Performance and Save Money When Specifying Transformers". |
| 4595-4657 | 546 | The Aroclor Compounds.                                                                                                                                         |
| 4658-4739 | 547 | The Proper Handling of Aroclors and Their Mixtures in the Electric Industry.                                                                                   |
| 4740-4769 | 548 | Aroclors Physical Properties and Suggested Applications Monsanto Company.                                                                                      |
| 4770-4863 | 549 | The Aroclors Physical Properties and Suggested Applications application data bulletin no. P-115 Monsanto Company.                                              |
| 4864-4917 | 550 | The Aroclors Physical Properties and Suggested Applications date April, 1971.                                                                                  |
| 4918-4929 | 551 | Reference bulletin on aroclor fluids for the transformer industry dated April 13, 1954.                                                                        |
| 4930-4961 | 552 | Monsanto askarel inspection and maintenance guide.                                                                                                             |
| 4962-4972 | 553 | Monsanto Corporate Fire Group fire retardant chemicals and products.                                                                                           |
| 4973-5094 | 554 | Monsanto Company material safety data sheets for polychlorinated biphenyls.                                                                                    |
| 5095-5100 | 555 | Monsanto news release dated 10/5/77.                                                                                                                           |
| 5101-5103 | 556 | Monsanto news release dated 04/15/71.                                                                                                                          |
| 5104-5107 | 557 | Monsanto news release dated 10/31/77.                                                                                                                          |
|           | 558 | [Reserved]                                                                                                                                                     |
| 5108-5112 | 559 | Monsanto news release dated 09/02/76.                                                                                                                          |
| 5113-5114 | 560 | Monsanto news release dated 08/07/67.                                                                                                                          |
| 5115-5122 | 561 | Monsanto news release dated 12/22/?.                                                                                                                           |
| 5123-5125 | 562 | Monsanto news release dated 12/09/68.                                                                                                                          |
| 5126-5130 | 563 | Monsanto news release dated 11/30/71.                                                                                                                          |

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| 5131-5134 | 564 | Monsanto news release dated 04/10/70.                                                                                                                     |
| 5135-5140 | 565 | Monsanto news release dated 03/26/70.                                                                                                                     |
|           | 566 | [Reserved]                                                                                                                                                |
| 5141-5143 | 567 | Monsanto news release dated 10/21/65.                                                                                                                     |
| 5144-5145 | 568 | Letter from James A. Alley, Industry Specialist, di-electrics fluids Monsanto Company to all capacitor and transformer customers dated February 18, 1977. |
| 5146-5148 | 569 | Letter from T.L. Gossage, Marketing Director, Specialty Products Group, Monsanto Company (form letter) undated.                                           |
| 5149-5150 | 570 | Monsanto form letter by Howard S. Bergen, Jr., Director, Specialty Products Group.                                                                        |
| 5151-5183 | 571 | Monsanto form letter signed by T.L. Gossage dated January 15, 1974.                                                                                       |
| 5184-5186 | 572 | Monsanto form letter signed by James A. Alley dated March 30, 1976.                                                                                       |
| 5187-5193 | 573 | EIA Spill Notification and Control Plan PCBs.                                                                                                             |
| 5194-5195 | 574 | Monsanto form letter signed by R.G. Potter, Business Director, Functional Products, dated October 4, 1976.                                                |
| 5196-5199 | 575 | Form letter signed by Elmore P. Wheeler, Manager Environmental Health dated March 3, 1969.                                                                |
| 5200-5217 | 576 | Monsanto form letter signed by W.E. Schalk, Director of Sales Plasticizers, undated.                                                                      |
| 5218-5220 | 577 | Monsanto form letter signed by T.L. Gossage, Marketing Director, Specialty Products Group, undated.                                                       |
| 5221-5223 | 578 | Monsanto form letter signed by C. Field Supervisor Customer Service Center undated.                                                                       |
| 5224-5227 | 579 | Monsanto form letter signed by C.R. Field Supervisor Customer Service Center undated.                                                                     |

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| 5228-5232 | 580 | Monsanto form letter signed by Howard Bergen, Director Specialty Products Group undated. |
| 5233-5329 | 581 | Article entitled PCBs-Prevalent and Persistent by Carl G. Gustafson.                     |
| 5240-5243 | 582 | Tentative Process for the Continuous Manufacture of Aroclor 1242 dated October 18, 1969. |
| 5244-5248 | 583 | Standard Manufacturing Process for Aroclors dated 09/66.                                 |
| 5249-5252 | 584 | The Manufacture of Aroclor dated 11/12/53.                                               |
| 5253-5257 | 585 | Manufacturing Process for Aroclor dated 07/69.                                           |
| 5258-5261 | 586 | Manufacturing Process for Aroclor 1016 dated 09/72.                                      |
| 5262-5303 | 587 | Manufacturing Aroclors and Pyronols undated.                                             |
| 5304-5308 | 588 | Manufacturer of Aroclors (Department 246) dated 12/17/62.                                |
| 5309-5313 | 589 | Manufacturer of Aroclors (Department 246) dated 07/20/64.                                |
| 5314-5326 | 590 | Manufacturer of Aroclors dated 06/20/46.                                                 |
| 5327-5330 | 591 | Manufacturer of Aroclors dated 06/76.                                                    |
| 5331-5334 | 592 | Manufacturer of Aroclors dated 1966.                                                     |
| 5335-5338 | 593 | Project report - Expansion of Aroclors dated 08/29/67.                                   |
| 5339-5344 | 594 | Standard Operating Instructions for Aroclors dated 07/64.                                |
| 5345-5347 | 595 | W.G.K. Operations Manual.                                                                |
| 5348-5352 | 596 | Operating Instructions-Still Operator dated 10/74.                                       |
| 5353-5358 | 597 | Operating Instructions dated 03/74.                                                      |
| 5359-5363 | 598 | Operating Instructions dated 06/76.                                                      |
| 5364-5368 | 599 | Operating Instructions undated.                                                          |

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| 5369-5376 | 600 | Manufacturing of Aroclors dated 1972.                                                         |
| 5377-5386 | 601 | Manufacturing of Aroclors dated 1966.                                                         |
| 5387-5391 | 602 | Manufacturing of Aroclors undated.                                                            |
| 5392-5396 | 603 | General Information re: Handling of Aroclor 1254 dated 1941.                                  |
| 5397-5398 | 604 | Advertisement entitled "In 1993, You May Have to Think".                                      |
| 5399-5400 | 605 | Advertisement entitled "Fluids That Increase Design Flexibility" dated 1962 through 1963.     |
| 5401-5404 | 606 | Advertisement entitled "A Renaissance in Engineer Designs".                                   |
| 5405-5406 | 607 | An advertisement entitled "Aroclors in Ample Supply" dated 03/24/52.                          |
| 5407-5408 | 608 | An advertisement entitled "Meet the Aroclors".                                                |
| 5409-5410 | 609 | Advertisement entitled "Genie of 1001 Engineering Feats".                                     |
| 5411-5412 | 610 | Drum Warning "The Yellow Drum".                                                               |
| 5413-5414 | 611 | Drum Warning "Safe Handling Askarel Fluids".                                                  |
| 5415-5418 | 612 | AAR Appendix C Dated 01/01/70.                                                                |
| 5419-5506 | 613 | The Proper Handling of Aroclors and Their Mixtures in the Electrical Industry dated 05/01/56. |
| 5507-5619 | 614 | The Proper Handling of Aroclors and Their Mixtures in the Electric Industry dated 1/60.       |
| 5620-5703 | 615 | The Proper Handling of Aroclors and Their Mixtures in the Electrical Industry dated 12/01/54. |
| 5704-5757 | 616 | American National Standard for Handling and Disposing PCBs No. C107.1 dated 01/25/73.         |
| 5758-5764 | 617 | Spill Notification and Control Plans re: PCBs.                                                |

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| 5765-5801 | 618 | American National Standard for Handling and Disposing of Capacitors and Transformers Containing PCBs dated 01/09/74. |
| 5802-5832 | 619 | MCS 1016 oral toxicity study IBT no. B9888 dated 04/28/72.                                                           |
| 5833-5841 | 620 | Interteen PPO-Rats Younger Lab dated 03/04/63.                                                                       |
| 5842-5843 | 621 | Animal feeding studies Younger Lab dated 06/08/74.                                                                   |
| 5844-5846 | 622 | Oral toxicity study Younger Lab dated 10/22/75.                                                                      |
| 5847-5861 | 623 | IBT report no. 641-06672 liver evaluations dated 03/24/75.                                                           |
| 5862-5866 | 624 | Aroclor 1260-skin test Younger Lab dated 06/25/62.                                                                   |
| 5867-5871 | 625 | Report by Dr. Frederick and Elin dated 05/25/34.                                                                     |
| 5872-5876 | 626 | Aroclor 1262 skin test Younger Lab dated 06/25/62.                                                                   |
| 5877-5881 | 627 | Aroclor 1268 skin test Younger Lab dated 07/09/62.                                                                   |
| 5882-5899 | 628 | Aroclor 4465 toxicity report dated 05/17/63.                                                                         |
| 5900-5906 | 629 | Aroclor 4465 skin test Younger Lab dated 07/03/62.                                                                   |
| 5907-5993 | 630 | Aroclor 1242, 1254, 1260 reproduction tests IBT no. J7300 dated 06/04/70.                                            |
| 5994-6002 | 631 | Toxicity of Aroclors no. 1016, and 1242 - Bionomics, Inc. dated 12/71.                                               |
| 6003-6107 | 632 | Studies of various Aroclors and Halowax IBT no. J7010 dated 04/23/69.                                                |
| 6018-6049 | 633 | Studies of various Aroclors IBT no. A7204 dated 06/13/69.                                                            |
| 6050-6055 | 634 | Aroclor 2 various studies IBT no. B7009 dated 04/15/69.                                                              |
| 6056-6095 | 635 | Aroclor nos. 1221, 5442 and MCS1016, IBT no. A9378 dated 03/25/71.                                                   |

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| 6096-6130 | 636 | Aroclor no. 1242 reproductive studies<br>IBT no. J8746 dated 06/15/71.        |
| 6131-6135 | 637 | Aroclor 1254 skin test Younger Lab dated<br>06/25/62.                         |
| 6136-6153 | 638 | Aroclor 1254 IBT report dated 03/29/63.                                       |
| 6154-6170 | 639 | Aroclor 1268 IBT report dated 03/28/63.                                       |
| 6171-6187 | 640 | Aroclor 1242 study IBT no. E9350 dated<br>09/08/71.                           |
| 6188-6237 | 641 | Aroclor 1242-3 generation reproductive<br>study IBT no. B7297 dated 11/01/71. |
| 6238-6253 | 642 | Aroclor 1260 mutagenic study IBT no.<br>E623 dated 01/13/72.                  |
| 6254-6329 | 643 | Aroclor 1254 two-year study IBT no.<br>C7299 dated 11/01/71.                  |
| 6330-6401 | 644 | Aroclor 1242 two-year study IBT no.<br>C7299 dated 11/01/71.                  |
| 6402-6475 | 645 | Aroclor 1260 two-year study IBT no.<br>C7299 dated 11/01/71.                  |
| 6476-6494 | 646 | Aroclor 1254 teratogenic study IBT no.<br>B9351 dated 09/08/71.               |
| 6495-6511 | 647 | Aroclor 1260 teratogenic study IBT no.<br>B9352 dated 09/09/71.               |
| 6512-6563 | 648 | MCS 1016 - 90 day oral toxicity IBT no.<br>C9887 dated 01/31/72.              |
| 6564-6617 | 649 | Aroclor 1221 - 90 day oral toxicity IBT<br>no. C9885 dated 12/30/71.          |
| 6618-6634 | 650 | Aroclor 1242 mutagenic study IBT no.<br>E621 dated 01/13/72.                  |
| 6635-6662 | 651 | Aroclors and MCS 1016 fish toxicity IBT<br>no. A9380 dated 01/12/72.          |
| 6663-6737 | 652 | Aroclors toxicity of vapors V. Kettering<br>Laboratory dated 06/28/55.        |
| 6738-6840 | 653 | Aroclors vapor toxicity the Kettering<br>Laboratory dated 06/22/55.           |
| 6841-6842 | 654 | Aroclors fish toxicity IBT no. 621-0589<br>dated 10/23/74.                    |

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| 6843-6858 | 655 | Aroclor 1242 two-year study IBT no. 641-06672 dated 03/24/75.                                          |
| 6859-6873 | 656 | Aroclor 1260 liver study IBT no. 64106672 dated 03/24/75.                                              |
| 6874-6877 | 657 | Aroclor 1242 - rat studies Scientific Associates dated 12/11/53.                                       |
| 6878-6882 | 658 | Aroclor 1242 - skin study Younger Lab dated 06/19/62.                                                  |
| 6883-6891 | 659 | Functional fluid formation Younger Lab dated 05/05/69.                                                 |
| 6892-6894 | 660 | Fish toxicity studies IBT no. A-1887.                                                                  |
| 6895-6811 | 661 | Aroclor 1242 dermal toxicity dated 03/27/63.                                                           |
| 6812-6942 | 662 | Aroclor 1242 reproductive study IBT no. J1291 dated 06/07/73.                                          |
| 6943-6947 | 663 | Aroclor 1232 skin studies Younger Lab dated 06/06/62.                                                  |
| 6948-6978 | 664 | Report on Histopathological Re-evaluation of Tissues from Femal Sherman Rats Fed Aroclor 1260.         |
| 6979-7021 | 665 | Report on Histopathological Re-evaluation of Livers from Rats Treated with Aroclor.                    |
| 7022-7023 | 666 | Letter from Dr. Halper (the Bernard Free Skin and Cancer Hospital) to Dr. Emmett Kelly dated 12/22/49. |
| 7024-7027 | 667 | Aroclor 1254 viscera studies Scientific Associates dated 11/10/53.                                     |
| 7028-7043 | 668 | Aroclor 1248 dermal toxicity dated 03/04/63.                                                           |
| 7044-7048 | 669 | Aroclor 1248 skin test Younger Lab dated 06/19/62.                                                     |
| 7049-7131 | 670 | Aroclor 1248 vapor toxicity the Kettering Lab dated 03/11/53.                                          |
| 7132-7136 | 671 | Aroclor 1221 skin test Younger Lab dated 06/13/62.                                                     |
| 7137-7155 | 672 | Aroclor 1221 dermal toxicity IBT no. CP98361 dated 03/28/63.                                           |

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| 7156-7184 | 673 | MCS 1016 toxicity-chickens IBT no. J899 dated 06/20/72.                               |
| 7185-7213 | 674 | Aroclor 1221 reproductive study IBT no. J900 dated 06/20/72.                          |
| 7214-7230 | 675 | Aroclor 1242 teratogenic study IBT no. B9350 dated 09/08/71.                          |
| 7231-7247 | 676 | Aroclor 1254 mutagenic study IBT no. E622 dated 01/13/72.                             |
| 7248-7267 | 677 | Various aroclors fish toxicity IBT no. A8570 dated 11/17/72.                          |
| 7268-7298 | 678 | Aroclor 1221 toxicity study IBT no. B9888 dated 04/28/72.                             |
| 7299-7347 | 679 | Aroclor 1260 three generation reproductive study IBT no. B7297 dated 11/04/71.        |
| 7348-7908 | 680 | Final report - reproductive effects on monkeys Litton Bionetics, Inc. dated 04/30/81. |
| 7909-7959 | 681 | Aroclor 1254 three generation reproductive study IBT no. B7297 dated 11/01/71.        |
| 7960-7981 | 682 | Biodegradation of PCBs by Tucker, Sager and Hicks dated 1975.                         |
| 7982-7984 | 683 | Resume of William Papageorge.                                                         |
| 7985-8035 | 684 | "The Role of PCBs in Producing Cancer" author unknown.                                |
| 8036-8045 | 685 | ASTM Standard D3304-74 analysis of environmental materials, PCBs dated 04/74.         |
| 8046-8055 | 686 | Biodegradation of PCBs by Tucker, Sager and Hicks dated 03/28/75.                     |
| 8056-8064 | 687 | Analysis of biodegradation data by Hinchin and Keller dated 11/70.                    |
| 8065-8078 | 688 | PCB residue in rats - 30 day study by Litschgi, Westenberger and Tucker dated 09/70.  |
| 8079-8104 | 689 | Biodegradation testing by Sager and Tucker dated 12/71.                               |

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| 8105-8142 | 690 | Analysis of environmental materials for PCBs by Litschgi, Mees and Tucker dated 10/71.      |
| 8143-8144 | 691 | Policy for distributors return of PCB to Monsanto dated 08/14/70.                           |
| 8145-8147 | 692 | Monsanto letter to distributors re: return of PCBs dated 09/28/70.                          |
| 8148-8167 | 693 | Reevaluation of IBT no. C7299 by Mees, Tucker, Litschgi, and Cowell dated 12/72.            |
| 8168-8174 | 694 | Analysis of Biological Materials for PCBs by Tucker, Mees, Litschgi and Keller dated 03/70. |
| 8175-8199 | 695 | Biodegradation Study (rough draft) by Tucker and Keller dated 04/70.                        |
| 8200-8220 | 696 | Reproductive and Residue Studies (PCB) by Mees, Tucker, Litschgi and Colwell dated 03/73.   |
| 8221-8241 | 697 | Analysis of Water and Sediment - PCBs by Tucker, Mees, Litschgi and Keller dated 11/70.     |
| 8242-8256 | 698 | Airborn PCBs by Tucker and Keller dated 11/70.                                              |
| 8257-8267 | 699 | Identification of PCBs - Gas Chromotology by Dietrich, Mieur and Keller dated 02/70.        |
| 8268-8287 | 700 | Residue Analysis: Fish Studies IBT no. A7204.                                               |
| 8288-8296 | 701 | Study of PCB Clean Up Procedures by Tucker, Litschgi and Keller dated 03/70.                |
| 8297-8301 | 702 | Hygenic Guide Series - PCBs dated 1965.                                                     |
| 8302-8476 | 703 | PCBs Effects on Reproduction of Monkeys by Monsanto Company dated 05/04/79.                 |
| 8477-8531 | 704 | A Review of Cancer Studies re: PCBs dated 10/14/81.                                         |
| 8532-8535 | 705 | Monsanto's general customer mailing list dated 1973.                                        |

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| 8536-8538 | 706 | Monsanto letter to all customers<br>"Potential Problems" with PCBs dated<br>02/1970.                |
| 8539-8541 | 707 | Monsanto letter to all customers dated<br>05/11/70.                                                 |
| 8542-8545 | 708 | Summary of IBTs Aroclor Studies dated<br>01/15/70.                                                  |
| 8546-8555 | 709 | Summary-Interim Status-Chronic Toxicity<br>with Aroclors dated 03/18/70.                            |
| 8556-8571 | 710 | PCBs - Liver Toxicity by G. Levinskas<br>dated 10/14/81.                                            |
| 8572-8580 | 711 | Quantative Determination of PCB in Work<br>Place Air author unknown undated.                        |
| 8581-8589 | 712 | Minutes of Board of Directors dated<br>05/22/69.                                                    |
| 8590-8591 | 713 | Minutes of Board of Directors dated<br>04/13/70.                                                    |
| 8592-8593 | 714 | Minutes of Board of Directors dated<br>06/02/70.                                                    |
| 8594-8595 | 715 | Minutes of Board of Directors dated<br>06/29/70.                                                    |
| 8596-8597 | 716 | Minutes of Board of Directors dated<br>07/27/70.                                                    |
| 8598-8601 | 717 | Minutes of Board of Directors dated<br>09/14/70.                                                    |
| 8602-8605 | 718 | Minutes of Board of Directors dated<br>03/08/71.                                                    |
| 8606-8608 | 719 | Minutes of Board of Directors dated<br>03/29/71.                                                    |
| 8609-8611 | 720 | Minutes of Board of Directors dated<br>07/05/77.                                                    |
| 8612-8613 | 721 | Letter from Papageorge to John Hurley,<br>Environmental Protection Agency, dated<br>April 16, 1971. |
| 8614-8615 | 722 | Letter from Papageorge to EPA dated<br>03/26/71.                                                    |
| 8616-8617 | 723 | Letter from Papageorge to EPA (Oregon)<br>dated 03/11/71.                                           |

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| 8618-8620 | 724 | Letter from Papageorge to EPA (Oregon)<br>dated 12/06/71.          |
| 8621-8623 | 725 | Letter from Papageorge to EPA (Ohio)<br>dated 11/05/71.            |
| 8624-8626 | 726 | Letter from Papageorge to EPA (Florida)<br>dated 06/02/72.         |
| 8627-8628 | 727 | Letter from Papageorge to EPA (Ohio)<br>dated 05/31/72.            |
| 8629-8630 | 728 | Letter from Papageorge to EPA (Florida)<br>dated 05/24/72.         |
| 8631-8632 | 729 | Letter from Papageorge to EPA (Georgia)<br>dated 11/30/72.         |
| 8633-8634 | 730 | Letter from Papageorge to EPA (Kansas)<br>dated 11/28/72.          |
| 8635-8637 | 731 | Letter from Papageorge to EPA (Illinois)<br>dated 08/31/72.        |
| 8638-8639 | 732 | Letter from Papageorge to EPA (Colorado)<br>dated 07/19/72.        |
| 8640-8641 | 733 | Letter from Papageorge to EPA (Georgia)<br>dated 07/10/72.         |
| 8642-8643 | 734 | Letter from Papageorge to EPA (Georgia)<br>dated 06/22/73.         |
| 8644-8645 | 735 | Letter from Papageorge to EPA (Georgia)<br>dated 03/20/73.         |
| 8646-8647 | 736 | Letter from Papageorge to EPA (Florida)<br>dated 03/12/73.         |
| 8648-8650 | 737 | Letter from Papageorge to EPA (Georgia)<br>dated 03/12/73.         |
| 8651-8654 | 738 | Letter from Papageorge to EPA (North<br>Carolina) dated 12/18/73.  |
| 8655-8672 | 739 | Letter from Papageorge to EPA<br>(Washington D.C.) dated 07/13/73. |
| 8673-8679 | 740 | Letter from Weber to EPA dated 03/28/77.                           |
| 8680-8683 | 741 | Letter from EPA to Monsanto dated<br>06/05/75.                     |

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| 8684-8736 | 742 | Letter from Papageorge to EPA dated 06/05/75.                                                                                              |
| 8737-8745 | 743 | News release dated 11/30/71.                                                                                                               |
| 8746-8757 | 744 | Letter from Monsanto to EPA (Washington D.C.) dated 08/04/78.                                                                              |
| 8758-8766 | 745 | Monsanto's presentation to EPA re: water quality hearings by Papageorge dated 11/29/73.                                                    |
| 8767-8791 | 746 | Monsanto's presentation to EPA re: hearing on Water Pollution Control Act dated 01/18/74.                                                  |
| 8791-8837 | 747 | Monsanto's presentation to EPA re: PCB emissions from stationary sources dated 09/76.                                                      |
| 8838-8841 | 748 | Letter from Webber to EPA dated 09/10/76.                                                                                                  |
| 8842-8846 | 749 | Letter from EPA to Monsanto dated 12/22/75.                                                                                                |
| 8847-8848 | 750 | Letter from EPA to Monsanto (undated).                                                                                                     |
| 8849-8855 | 751 | Letter from Monsanto to EPA dated 02/24/71.                                                                                                |
| 8856-8857 | 752 | EPA memo re: PCB inspection Monsanto Sauget, Illinois, dated 03/09/?.                                                                      |
| 8858-8885 | 753 | EPA memo re: emissions of PCB from incinerator from Monsanto Sauget, Illinois, dated 02/11/76.                                             |
| 8886-8889 | 754 | Memo re: inspection of Monsanto Company Sauget, Illinois, dated January 27, 1976.                                                          |
| 8890-8893 | 755 | United States Government memo re: calculation of PCB air emissions from storage and dispensing operations of Monsanto dated March 5, 1976. |
| 8894-8906 | 756 | EPA memo re: PCB monitoring - Monsanto Sauget, Illinois, plant dated 02/13/76.                                                             |
| 8907-8908 | 757 | Letter from Robert D. Harness, Environmental Control, Monsanto Company to EPA dated December 7, 1976.                                      |
| 8909-8913 | 758 | Letter from Clayton F. Callis, Monsanto Company to EPA dated December 21, 1979.                                                            |

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| 8914-8915 | 759 | Letter from Roger L. Williams, EPA, to Mr. J.W. Hanley, President and Chairman of the Board, Monsanto Company, dated December 3, 1979. |
| 8915-8917 | 760 | Letter from EPA to E.J. Bock, Monsanto Company, undated.                                                                               |
| 8918-8927 | 761 | Letter from W.R. Corey, Director Functional Products Group, Monsanto Company, to EPA dated March 3, 1972.                              |
| 8928-8929 | 762 | Letter from W.B. Papageorge to Welburne Johnson, EPA dated March 26, 1971.                                                             |
| 8930-8932 | 763 | Letter from Papageorge to Lewis Lafke, EPA dated November 5, 1971.                                                                     |
| 8933-8937 | 764 | Letter from Papageorge to Donald Baumgartner EPA dated December 6, 1971.                                                               |
| 8938-8949 | 765 | Letter from W.R. Corey, Monsanto Company to EPA dated August 4, 1978.                                                                  |
| 8950-8955 | 766 | Letter from Webber to EPA dated March 15, 1976.                                                                                        |
| 8956-8958 | 767 | Letter from Roger L. Williams, EPA, to J.W. Hanley, Monsanto Company dated October 25, 1979.                                           |
| 8959-8960 | 768 | Letter from Webber to Naomi Jaffe, EPA, dated August 29, 1977.                                                                         |
| 8961-8976 | 769 | Form letter from OECD dated July 11, 1977.                                                                                             |
| 8977-8978 | 770 | Letter from Webber to George Wirth, EPA, dated February 7, 1977.                                                                       |
| 8979-8980 | 771 | Letter from Phocion Park Environmental Council to Roy Harsch, EPA, dated October 4, 1976.                                              |
| 8981-8982 | 772 | Letter from R.W. Flint, Monsanto Company to EPA dated May 19, 1976.                                                                    |
| 8983-8984 | 773 | Letter from Ronald Webb, EPA to Monsanto Company dated September 28, 1971.                                                             |

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| 8985-9001 | 774 | Meeting manuscript to be presented at the 162nd national meeting of the American Chemical Society. Identities of polychlorinated biphenyls isomers in aroclors by Ronald G. Webb and Ann C. McCall dated September 13, 1971. |
| 9002-9003 | 775 | Letter from Webber to EPA dated July 12, 1976.                                                                                                                                                                               |
| 9004-9005 | 776 | Letter from Bruce W. Eley to EPA dated April 13, 1977.                                                                                                                                                                       |
| 9006-9007 | 777 | Letter from Papageorge to EPA dated March 11, 1971.                                                                                                                                                                          |
| 9008-9010 | 778 | Letter from Wheeler to EPA dated March 11, 1971.                                                                                                                                                                             |
| 9011-9021 | 779 | EPA analysis of polychlorinated biphenyl samples dated November 26, 1979.                                                                                                                                                    |
| 9022-9030 | 780 | Polychlorinated biphenyl presentation to EPA dated November 29, 1973.                                                                                                                                                        |
| 9031-9049 | 781 | EPA sales sample request.                                                                                                                                                                                                    |
| 9050-9093 | 782 | A theoretical study of PCB emissions from stationary sources final report by Herman Knieriem, Jr. dated September 1976.                                                                                                      |
| 9094-9142 | 783 | EPA's review of PCB contaminated sites.                                                                                                                                                                                      |
| 9143-9163 | 784 | Letter from Papageorge to NIOSH dated November 29, 1976.                                                                                                                                                                     |
| 9164-9168 | 785 | Press release dated July 16, 1970.                                                                                                                                                                                           |
| 9169-9170 | 786 | Letter from Monsanto to U.S. EPA dated 01/14/76.                                                                                                                                                                             |
| 9171-9172 | 787 | Letter from EPA to Monsanto Company dated May 7, 1976.                                                                                                                                                                       |
| 9173-9197 | 788 | Report on investigation of PCB manufacturing facility Monsanto Company Sauget, Illinois, dated January 27, 1976.                                                                                                             |
| 9198-9229 | 789 | Letter from EPA to Monsanto dated 12/01/75.                                                                                                                                                                                  |
| 9230-9514 | 790 | Letter from Monsanto to EPA dated March 12, 1974.                                                                                                                                                                            |

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| 9515-9516 | 791 | Letter from Papageorge to NIOSH dated December 1, 1975.                                                      |
| 9517-9521 | 792 | Sales sample request dated 07/23/76.                                                                         |
| 9522-9525 | 793 | Letter from NIOSH to Monsanto Company dated August 20, 1976.                                                 |
| 9526-9538 | 794 | Industrial Hygiene Survey of Monsanto Plant at Saugett, Illinois, dated May 6, 1977.                         |
| 9539-9540 | 795 | Letter from P.E. Heisler, Monsanto Company to NIOSH dated April 6, 1977.                                     |
| 9541-9565 | 796 | Memo from P.E. Heisler to Webber and Park re: NIOSH PCB survey dated March 11, 1977.                         |
| 9566-9613 | 797 | Mortality and Industrial Hygiene Study of Workers Exposed to PCBs dated 01/76.                               |
| 9614-9640 | 798 | Letter from Papageorge to EPA dated December 22, 1975.                                                       |
| 9641-9646 | 799 | Letter from Papageorge to NEMA dated April 14, 1971.                                                         |
| 9647-9670 | 800 | Letter from Papageorge to EPA dated November 5, 1971.                                                        |
| 9671-9683 | 801 | Letter from Papageorge to NEMA dated December 19, 1975.                                                      |
| 9684-9696 | 802 | EPA Water Programs dated December 27, 1973.                                                                  |
| 9697-9703 | 803 | Letter from Papageorge to EPA dated July 13, 1973.                                                           |
| 9704-9759 | 804 | Letter from Papageorge to EPA dated August 6, 1973; & attachment.                                            |
| 9760-9778 | 805 | General Electric letter re: revised guidelines for capacitors-scrap disposal procedures dated March 1, 1972. |
| 9779-9792 | 806 | G.E. letter dated April 12, 1972.                                                                            |
| 9793-9794 | 807 | International Di-Electrics Symposium reservation sheet dated 09/79.                                          |

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| 9795-9821 | 808 | Letter from A.M. Salazar NEMA to all members of American National Standards Committee C107, on use and disposal of askarel and askarel soaked materials for electrical equipment re: status of EPA activity on toxic pollutants dated May 8, 1975. |
| 9822-9826 | 809 | Minutes of ANSI meeting dated February 8, 1972.                                                                                                                                                                                                    |
| 9827-9846 | 810 | ANSI minutes of meeting dated December 5, 1971.                                                                                                                                                                                                    |
| 9847-9853 | 811 | ANSI new minutes of meeting dated May 25, 1972.                                                                                                                                                                                                    |
| 9854-9856 | 812 | Letter from NEMA to all voting representatives in the capacitor and transformer sections re: proposed NEMA position paper on PCBs dated November 14, 1975.                                                                                         |
| 9857-9860 | 813 | NEMA minutes of meeting dated February 23, 1971.                                                                                                                                                                                                   |
| 9861-9883 | 814 | Minutes of meetings from 1970s.                                                                                                                                                                                                                    |
| 9884-9904 | 815 | ANSI organizational meeting dated August 12, 1971.                                                                                                                                                                                                 |
| 9905-9915 | 816 | Agenda for December 15, 1971 ANSI meeting dated November 18, 1971.                                                                                                                                                                                 |
| 9916-9924 | 817 | ANSI meeting notice dated August 18, 1972.                                                                                                                                                                                                         |
| 9925-9927 | 818 | Memo from E.L. Raab, Manager Di-Electric Systems Laboratory, General Electric, dated March 29, 1972.                                                                                                                                               |
| 9928-9936 | 819 | Letter from A.M. Salazar to ANSI dated December 3, 1973.                                                                                                                                                                                           |
| 9937-9942 | 820 | Letter from ANSI to all members of committee C107 dated July 24, 1973.                                                                                                                                                                             |
| 9943-9945 | 821 | Letter from ANSI to all members of subcommittee on use and disposal of askarel and askarel soaked materials in electrical equipment dated December 23, 1975.                                                                                       |

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| 9946-9957   | 822 | Letter from NEMA to EPA re: proposed toxic pollutant effluent standards - PCBs dated March 25, 1974.                                                                                               |
| 9958-9959   | 823 | Letter from Papageorge to NEMA dated December 19, 1975.                                                                                                                                            |
| 9960-9971   | 824 | Letter from T.K. Sloat, Secretary, IEEE Fluids Subcommittee, dated October 14, 1974.                                                                                                               |
| 9972-9998   | 825 | Letter from A.M. Salazar NEMA to all members of the American National Standards Committee dated May 8, 1975.                                                                                       |
| 9999-10025  | 826 | Letter from A.M. Salazar ANSI to all members of special working groups to prepare preliminary recommendations for the capacitor and transformer subcommittees dated November 18, 1971.             |
| 10026-10028 | 827 | Letter from Papageorge to EPA dated November 4, 1971.                                                                                                                                              |
| 10029-10037 | 828 | Letter from A.M. Salazar ANSI to all members of the ANSI committee C107 dated August 18, 1972.                                                                                                     |
| 10038-10044 | 829 | Letter from A.M. Salazar NEMA to the ad hoc committee on transformer oil crisis of the planning committee of the transformer section re: proposed toxic pollutant standards dated January 8, 1974. |
| 10045-10049 | 830 | Agenda for ANSI working group on capacitors dated December 3, 1971.                                                                                                                                |
| 10050-10054 | 831 | Letter from Papageorge to General Electric dated February 2, 1972.                                                                                                                                 |
| 10055-10056 | 832 | Letter from Papageorge to E.L. Raab dated January 19, 1972.                                                                                                                                        |
| 10057       | 833 | Letter from Papageorge to General Electric dated May 2, 1973.                                                                                                                                      |
| 10058-10060 | 834 | Letter from Papageorge to ANSI Committee C 107 dated January 19, 1973.                                                                                                                             |
| 10061-10062 | 835 | Letter from Papageorge to ANSI dated December 3, 1974.                                                                                                                                             |
| 10063-10064 | 836 | Letter from Papageorge to ANSI dated August 6, 1974.                                                                                                                                               |

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|-------------|-----|----------------------------------------------------------------------------------------|
| 10065-10066 | 837 | Letter from Papageorge to NEMA dated December 19, 1975.                                |
| 10067-10068 | 838 | Letter from Papageorge to NEMA dated October 28, 1975.                                 |
| 10069-10070 | 839 | Letter from John Mason to Office of Science and Technology dated May 15, 1970.         |
| 10071-10072 | 840 | Letter from Monsanto to Office of Science and Technology dated December 7, 1971.       |
| 10073-10075 | 841 | Letter from Monsanto to Office of Science and Technology dated November 11, 1971.      |
| 10076-10078 | 842 | Handwritten note form EPA to Monsanto Company dated October 25, 1977.                  |
| 10079-10119 | 843 | An Assessment of New Options in Energy Research and Development November 1973.         |
| 10120-10124 | 844 | Letter from John Mason to Office of Science and Technology dated October 20, 1971.     |
| 10125-10126 | 845 | Letter from Edward J. Burger to Mr. Mason dated October 15, 1971.                      |
| 10127-10128 | 846 | Letter from John Mason to John D. Baldeschwieler Office dated October 20, 1971.        |
| 10129-10131 | 847 | Letter from John Mason to Office of Science and Technology dated September 24, 1971.   |
| 10132-10133 | 848 | Letter from John Mason to Office of Science and Technology dated December 7, 1971.     |
| 10134-10136 | 849 | Letter from John Mason to Office of Science and Technology dated November 11, 1971.    |
| 10137-10139 | 850 | Letter from K. Warren Easley to Office of Science and Technology dated April 25, 1972. |

|             |     |                                                                                                                                                                                                             |
|-------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10140-10155 | 851 | Letter from E. L. Raab, Manager, Dielectric Systems Laboratory Re: Westinghouse Report on "The Need for Continued Use of Polychlorinated Biphenyls as Electrical Insulating Liquid" dated January 11, 1972. |
| 10156-10168 | 852 | The Need for Continued Use of Polychlorinated Biphenyls as Electrical Insulating Liquids by Electrical and Nuclear Sub-counsel National Industrial Pollution Control Counsel dated January 5, 1972.         |
| 10169-10170 | 853 | A letter from K. Warren Easley to Office of Science and Technology dated April 25, 1972.                                                                                                                    |
| 10171-10172 | 854 | Letter from Edward J. Berger to Warren Easley dated April 26, 1972.                                                                                                                                         |
| 10173-10198 | 855 | A case study Polychlorinated Biphenyls by Edward J. Berger, Office of Science and Technology dated December 1974.                                                                                           |
| 10199-10204 | 856 | Letter from Edward J. Berger to John Mason, Monsanto Company dated October 15, 1971.                                                                                                                        |
| 10205-10126 | 857 | Polychlorinated Biphenyls - a case study by Edward J. Berger dated December 1974.                                                                                                                           |
| 10231-10232 | 858 | Letter from Edward J. Berger to Warren Easley dated April 26, 1972.                                                                                                                                         |
| 10233-10234 | 859 | Letter from Warren Easley to Office of Science and Technology dated April 25, 1972.                                                                                                                         |
| 10235-10236 | 860 | Letter from John Mason to Office of Science and Technology dated November 11, 1971.                                                                                                                         |
| 10237-10238 | 861 | Letter from John Mason to Office of Science and Technology dated October 20, 1971.                                                                                                                          |
| 10239-10241 | 862 | Letter from Electrical Utilities Company to Office of Science and Technology dated January 18, 1972.                                                                                                        |
| 10242-10244 | 863 | Letter from John Mason to Office of Science and Technology dated September 24, 1971.                                                                                                                        |

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| 10245-10250 | 864 | Letter from Walter A. Hamilton, Deputy Assistant Secretary, Economic Affairs NIPCC to Monsanto Company dated November 18, 1971.                                                                                           |
| 10251-10253 | 865 | Letter from P. G. Benignus to Westinghouse Electric Corporation Re: Askarels Paris Meeting dated August 7, 1972.                                                                                                          |
| 10254-10255 | 866 | Monsanto's PCB incinerator information dated January 6, 1972.                                                                                                                                                             |
| 10256-10257 | 867 | Memo from P. G. Benignus to H. S. Bergen dated August 4, 1971.                                                                                                                                                            |
| 10258-10262 | 868 | Memo from P. G. Benignus to Papageorge dated December 8, 1971.                                                                                                                                                            |
| 10263-10264 | 869 | Memo from P. G. Benignus to E. Liang dated December 8, 1971.                                                                                                                                                              |
| 10265-10276 | 870 | Agenda for December 15, 1971 Meeting of Members of the Special Working Groups to prepare preliminary recommendations for the capacitor and transformer sub-committees of the ANSI Committee C107 dated November 18, 1971. |
| 10277-10278 | 871 | Letter from P. G. Benignus to A. M. Salazar dated October 29, 1971.                                                                                                                                                       |
| 10279-10280 | 872 | Letter from Papageorge to Benignus dated January 19, 1973.                                                                                                                                                                |
| 10281-10282 | 873 | Memo from P. G. Benignus to R. E. Keller dated December 17, 1971.                                                                                                                                                         |
| 10283-10285 | 874 | Letter from Papageorge to EPA dated November 5, 1971.                                                                                                                                                                     |
| 10286-10290 | 875 | Letter from Papageorge to General Electric Company dated February 2, 1972.                                                                                                                                                |
| 10291-10292 | 876 | Memo from P. G. Benignus to Papageorge dated March 8, 1973.                                                                                                                                                               |
| 10293-10295 | 877 | Letter from John Mason to Office of Science and Technology dated October 20, 1971.                                                                                                                                        |
| 10296-10297 | 878 | Letter from John Mason to Office of Science and Technology dated October 20, 1971.                                                                                                                                        |

|             |     |                                                                     |
|-------------|-----|---------------------------------------------------------------------|
| 10298-10299 | 879 | Letter from Papageorge to EPA dated June 25, 1971.                  |
| 10300-10301 | 880 | Letter from Papageorge to EPA dated April 29, 1971.                 |
| 10302-10303 | 881 | Letter from Papageorge to EPA dated February 10, 1971.              |
| 10304-10308 | 882 | Letter from Papageorge to EPA dated June 16, 1972.                  |
| 10309-10310 | 883 | Letter from Papageorge to EPA dated April 2, 1973.                  |
| 10311-10312 | 884 | Letter from Papageorge to EPA dated August 6, 1973.                 |
| 10313-10329 | 885 | Letter from Papageorge to EPA dated March 14, 1974.                 |
| 10330-10331 | 886 | Letter from Papageorge to EPA dated January 18, 1974.               |
| 10332-10336 | 887 | Letter from Papageorge to Hearing Clerk EPA dated January 18, 1974. |
| 10337-10338 | 888 | Letter from Papageorge to EPA dated May 27, 1975.                   |
| 10339-10340 | 889 | Letter from Papageorge to EPA dated August 29, 1975.                |
| 10341-10344 | 890 | Letter from EPA to Monsanto Company dated December 6, 1971.         |
| 10345-10346 | 891 | Letter from Weber to EPA dated June 30, 1977.                       |
| 10347-10351 | 892 | Letter from Papageorge to Hearing Clerk EPA dated January 18, 1974. |
| 10352-10353 | 893 | Letter from Papageorge to EPA dated August 6, 1973.                 |
| 10354-10360 | 894 | Letter from Papageorge to EPA dated July 13, 1973.                  |
| 10361-10362 | 895 | Letter from James Mieure to EPA dated May 12, 1975.                 |
| 10363-10365 | 896 | Letter from Papageorge to EPA dated July 3, 1975.                   |

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| 10366-10400 | 897 | Letter from EPA to Monsanto Company dated June 5, 1975.                                                                                |
| 10401-10402 | 898 | Letter from Papageorge to EPA dated August 29, 1975.                                                                                   |
| 10403-10407 | 899 | Letter from John Caldwell, EPA to Monsanto dated July 12, 1976.                                                                        |
| 10408-10427 | 900 | Letter from Monsanto EPA dated March 12, 1974.                                                                                         |
| 10428-10437 | 901 | Federal Register, EPA, Polychlorinated Biphenyls Manufacturing, Processing, Distribution and Commerce and Use Bans dated June 7, 1978. |
| 10438-10448 | 902 | Letter from W. R. Corey, Monsanto Company to EPA dated August 4, 1978.                                                                 |
| 10449-10451 | 903 | Letter from Weber to EPA dated March 15, 1976.                                                                                         |
| 10452-10455 | 904 | Limitation on the Use of Antimony Pentachloride for Perchlorination of Polychlorinated Biphenyls by Trotter and Young.                 |
| 10456-10461 | 905 | Determination of Polychlorinated Biphenyls in Therminal 66 By Electron Capture Gas Chromatography.                                     |
| 10462-10688 | 906 | Burning Waste Chlorinated Hydrocarbons in a Cement Kiln dated March 1977.                                                              |
| 10689-10691 | 907 | Letter from Weber to EPA dated March 15, 1976.                                                                                         |
| 10692-10705 | 908 | Letter from EPA to Monsanto Company dated December 1, 1975.                                                                            |
| 10706-10724 | 909 | Recommended Procedures for the Disposal of PCB Containing Waste (Industrial Facilities).                                               |
| 10725-10729 | 910 | Letter from EPA to Monsanto Company dated October 22, 1975.                                                                            |
| 10730-10731 | 911 | Letter from EPA to Monsanto Company dated October 12, 1978.                                                                            |
| 10732-10733 | 912 | Letter from E. S. Tucker, Research Group Leader, Analytical Chemistry Group to EPA dated October 7, 1971.                              |

|             |     |                                                                                                                                                                |
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| 10734-10735 | 913 | Letter from Ronald G. Web, Research Chemist, EPA to Monsanto Company dated September 28, 1971.                                                                 |
| 10736-10748 | 914 | Letter from Papageorge to Dr. Jerry M. Johnson dated November 29, 1976.                                                                                        |
| 10749-10751 | 915 | Letter from Weber to EPA dated December 6, 1976.                                                                                                               |
| 10752-10759 | 916 | Letter from EPA to Monsanto dated October 17, 1975.                                                                                                            |
| 10760-10761 | 917 | Letter from Edwin Putzell, Jr. to EPA dated August 8, 1975.                                                                                                    |
| 10762-10772 | 918 | Letter from W. R. Corey to EPA dated March 3, 1972.                                                                                                            |
| 10773-10774 | 919 | Letter from EPA to Monsanto Company (undated).                                                                                                                 |
| 10775-10779 | 920 | Letter from Ocean Phocion Park to EPA dated July 1, 1977.                                                                                                      |
| 10780-10781 | 921 | Letter from Dr. James Mieure to EPA dated May 12, 1975.                                                                                                        |
| 10782-10783 | 922 | Letter from Weber to EPA dated June 14, 1976.                                                                                                                  |
| 10784-10786 | 923 | Letter from EPA to Monsanto dated May 29, 1978.                                                                                                                |
| 10787-10788 | 924 | EPA Memo Re: PCB Inspection Monsanto, Sauget, Illinois Plant dated March 9?                                                                                    |
| 10789-10833 | 925 | EPA Memo Re: Emissions of PCB from the Incinerator at Monsanto, Sauget, Illinois dated February 11, 1975.                                                      |
| 10834-10870 | 926 | Environmental Polychlorinated Biphenyl Contamination Near Sites of Manufacture and Use prepared by Environmental Science and Engineering Inc. dated July 1975. |
| 10871-10874 | 927 | Letter from EPA to Monsanto Company dated February 25, 1972.                                                                                                   |
| 10875-10876 | 928 | Letter from Monsanto to EPA dated January 14, 1976.                                                                                                            |

10877-10882 929 EPA Memo Re: Interagency Meeting on PCBs In The Environment dated May 2, 1972.

10883-10885 930 Letter from EPA to Monsanto Company dated December 22, 1975.

10886-10887 931 Monsanto Form Letter signed by James A. Aley to customer Re: Monsanto will stop accepting polychlorinated biphenyls.

10888-10889 932 Letter from Monsanto to EPA dated June 30, 1977.

10890-10901 933 Letter from Monsanto to EPA dated August 4, 1978.

10902-10907 934 Letter from Weber to EPA dated March 15, 1976.

10908-10909 935 Letter from Monsanto to EPA dated July 27, 1978.

10910-10911 936 Letter from Kenneth Smith, Labeling Supervisor to EPA dated March 16, 1978.

10912- 937 Letter from Monsanto to EPA dated March 24, 1976.

10913-10914 938 Letter from EPA to Monsanto dated March 19, 1976.

10915-10920 939 Draft copy of Hazardous Materials Pollution Control Symposium Field Response for May 18, 19 and 20, 1976.

10921-10924 940 Letter from Papageorge to U.S. Department of Commerce dated February 21, 1974.

10925-10928 941 Letter from Sydney R. Galler, Deputy Assistant Secretary for Environmental Affairs, Department of Commerce to Monsanto Company dated January 15, 1974.

10929-10932 942 Letter from EPA to Monsanto Company dated November 21, 1979.

10933-10936 943 Letter from Monsanto Company to EPA dated June 28, 1979.

10937-10994 944 Letter from EPA to Monsanto Company, Medical Department dated August 29, 1975.

|             |     |                                                                                                                                                                                                                                          |
|-------------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10995-11000 | 945 | EPA support documents/draft voluntary environmental impact statement for PCBs prepared by Office of Toxic Substances dated May 1978.                                                                                                     |
| 11001-11002 | 946 | Memo from EPA to participants in the November 1975 National Conference on PCBs.                                                                                                                                                          |
| 11003-11011 | 947 | Statement of Honorable Russell E. Train, Administrator, EPA before the Subcommittee on Fisheries and Wildlife Conservation and the Environment Committee on the Merchant Marine and Fisheries House of Representatives January 28, 1976. |
| 11012-11013 | 948 | Letter from EPA to Monsanto Company dated June 4, 1976.                                                                                                                                                                                  |
| 11014-11018 | 949 | Letter from State of Wisconsin/Department of Natural Resources to National Agricultural Chemicals Association dated September 11, 1975.                                                                                                  |
| 11019-11064 | 950 | EPA memo Re: Emissions of PCB from Incinerator at Monsanto, Sauget, Illinois dated February 11, 1976.                                                                                                                                    |
| 11065-11067 | 951 | ANSI Notice to All Members and Alternates of ANSI Sub-Committee on Use and Disposal of Askeral dated December 23, 1975.                                                                                                                  |
| 11068-11074 | 952 | Letter from EPA to Monsanto Research Labs dated September 12, 1972.                                                                                                                                                                      |
| 11075-11079 | 953 | Memo from EPA Re: Identification and Control of PCBs in Transformer and Capacitor Plants dated January 14, 1976.                                                                                                                         |
| 11080-11083 | 954 | Off-Site Disposal Checklist.                                                                                                                                                                                                             |
| 11084-11085 | 955 | Monsanto Memo Re: TSCA-PCB Marking and Disposal Regulation dated July 8, 1980.                                                                                                                                                           |
| 11086-11222 | 956 | Toxic Substances Control Act, PCB Marking and Disposal Regulation, Interim Inspection Guidance.                                                                                                                                          |
| 11223-11265 | 957 | Corrections to EPA's final PCB Ban Rule: Over 100 Questions and Answers to Help You Meet These Requirements.                                                                                                                             |

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| 11266-11267 | 958 | Letter from EPA to Monsanto Company dated November 9, 1971.                                                                            |
| 11268-11270 | 959 | EPA Memo Re: PCB Inspection Monsanto Plant Correction to Calculated Storage Tank Emissions dated May 20, 1976.                         |
| 11271-11275 | 960 | EPA Memo Re: PCB Inspection Monsanto, Sauget, Illinois Plant dated May 20, 1976.                                                       |
| 11276-11283 | 961 | EPA Memorandum to Chemical Control Division Re: Review of Studies on the Health Effects of PCB dated December 31, 1981.                |
| 11284-11285 | 962 | Letter from Papageorge to National Institute of Health dated August 10, 1973.                                                          |
| 11286-11287 | 963 | Letter from Department of Health, Education and Welfare to Monsanto dated August 30, 1976.                                             |
| 11288-11295 | 964 | Draft of Polychlorinated Biphenyls in Air, Measurements Research Branch, Analytical Method dated issued 7/1/76 - date revised 8/20/76. |
| 11296-11297 | 965 | Letter from Department of Health, Education and Welfare to Monsanto Company dated January 17, 1977.                                    |
| 11298-11299 | 966 | Letter from Papageorge to NIOSH dated December 20, 1976.                                                                               |
| 11300-11309 | 967 | Letter from Papageorge to Dr. Jerry M. Johnson dated November 29, 1976.                                                                |
| 11310-11311 | 968 | Letter from Department of Health, Education and Welfare to Monsanto Chemical Corp. Medical Director dated October 30, 1974.            |
| 11312-11313 | 969 | Letter from Emmett Kelley, Medical Director to Department of Health, Education and Welfare dated October 22, 1974.                     |
| 11314-11315 | 970 | Letter from Emmett Kelley to Department of Health, Education and Welfare dated October 21, 1974.                                       |

|             |     |                                                                                                                                                                                  |
|-------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11316-11318 | 971 | Letter from Department of Health,<br>Education and Welfare to Monsanto<br>Company dated October 15, 1974.                                                                        |
| 11319-11321 | 972 | Form Letter from Department of Health,<br>Education and Welfare dated August 20,<br>1976.                                                                                        |
| 11322-11350 | 973 | Draft of Mortality and Industrial<br>Hygiene Study of Workers Exposed to<br>Polychlorinated Biphenyls by David P.<br>Brown and Mark Jones.                                       |
| 11351-11360 | 974 | Affidavit of Roscoe M. Moore, Jr.,<br>United States Environmental Protection<br>Agency in Re: Proposed Toxic Pollutant<br>Affluent Standards for PCBs dated<br>November 2, 1976. |
| 11361-11363 | 975 | Form Letter from Department of Health,<br>Education and Welfare dated August 20,<br>1976.                                                                                        |
| 11364-11366 | 976 | Letter from Department of Health,<br>Education and Welfare to Monsanto<br>Company dated August 20, 1976.                                                                         |
| 11367-11368 | 977 | Letter from Mobile Oil Corporation to<br>Monsanto Company dated June 25, 1976.                                                                                                   |
| 11369-11388 | 978 | Letter from Harry A. Sinclair, M.D. to<br>NIOSH dated June 24, 1976.                                                                                                             |

| Exhibit | Bates No. | Description |
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| <u>Exhibit</u> | <u>Bates No.</u> | <u>Description</u> |
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|-----|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 979 | 904313-<br>904341 | The Problem of Possible Systemic Effects From Certain Chlorinated Hydrocarbons, from The Journal of Industrial Hygiene and Toxicology, Vol. 19, No. 7, September 1937; by Cecil K. Drinker, Madeleine Field Warren, Granville A. Bennett |
| 980 | 904410-<br>904416 | Thomas O. Munson Curriculum Vitae                                                                                                                                                                                                        |
| 981 | 904417            | Memo to All Marketing from Floyd A. Bean dated 8/29/75                                                                                                                                                                                   |
| 982 | 904418-<br>904450 | Statement of Richard K. Sluder, dated 8/11/92                                                                                                                                                                                            |
| 983 | 904451-<br>904472 | Letter to Stephen R. Wassersug, EPA Philadelphia, from Roger E. Wills, Jr., Westinghouse, dated 9/16/75, with attachments                                                                                                                |
| 984 | 904473-<br>904476 | Memo to S. W. Herwald, W. E. Shoupp, D. Berg, J. C. R. Kelly, E. V. Somers, G. C. Gainer, T. O. Munson, L. Mandelcorn & S. Jordan from G. W. Wiener, dated 12/28/71 re minutes of pcb status.                                            |
| 985 | 904477-<br>904486 | Letter to D. S. McCrea from Jan Feldman, Pope & John, dated 10/5/91, re attached responses to request for production in <u>Baker v. Westinghouse</u>                                                                                     |
| 986 | 904487            | Statement of Dr. T. O. Munson, dated 8/13/88                                                                                                                                                                                             |
| 987 | 904488-<br>904492 | Letters to D. S. McCrea from T. O. Munson, dated 11/6/88 & 11/7/88 re Sauter, Kurz, J. Morrow, PCB monitoring                                                                                                                            |
| 988 | 904493-<br>904511 | Letter to D. S. McCrea from T. O. Munson, dated 8/11/88; History of the Westinghouse PCB Survey, dated 8/6/88; Date of Meeting with Westinghouse CEO, by T. O. Munson, dated 8/9/88                                                      |
| 989 | 904512-<br>904520 | Exerpt from Trial Proceedings, Vol. I, 7/18/88, Conard v. Westinghouse                                                                                                                                                                   |

| Exhibit  | Bates No.         | Description                                                                                                                                                                                                                                 |
|----------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 990      | 904390-<br>904408 | Letter to David P. Brown, NIOSH, from Terry L. Leet, Monsanto Co., dated 2/27/85; attached report Mortality of PCB Workers at the Monsanto Plant in Sauget, Illinois, by Judith A. Zack & David C. Musch, dated 12/14/79                    |
| 991-1095 |                   | [Reserved]                                                                                                                                                                                                                                  |
| 1095     | 905170-<br>905172 | Letter From the President, with attached The Monsanto Pledge; by Earle H. Harbison, Jr., President and Chief Operating Officer, Monsanto Co., undated.                                                                                      |
| 1096     | 905173-<br>905182 | Mortality Among Workers Exposed to Polychlorinated Biphenyls; by T. Sinks, G. Steele, A. Smith, K. Watkins, R. Shults; <u>American Journal of Epidemiology</u> , dated 3/16/92                                                              |
| 1097     | 905148-<br>905169 | Review of files retained at Industrial Hygiene Department at Research and Development Center, Westinghouse; undated; name of one author illegible, and C. W. Bickerstaff, Mgr., Corp. Industrial Hygiene, Industrial Affairs, Westinghouse. |
| 1098     | 905077-<br>905131 | Section A Transformer Askarel                                                                                                                                                                                                               |
| 1099     | 905132-<br>905147 | Investigation of the Gases Produced by the Electrical Arcing of Inerteen; Westinghouse Electric Corp., Transformer Divisions, dated 7/25/69                                                                                                 |
| 1100     | 736592-<br>736595 | Memo to Field Sales District Managers & Engineers, & Selected Product Dept. Sales Managers, from R. W. Frahm, General Electric, dated 4/18/72                                                                                               |
| 1101     | 712895-<br>712896 | Letter to Lowell E. Miller, EPA, from W. B. Papageorge, dated 10/29/73                                                                                                                                                                      |
| 1102     | 707477-<br>707478 | Sales Sample Request; & Outbound Shipping Report, dated 11/18/68                                                                                                                                                                            |
| 1103     | 711772            | Letter to Lowell E. Miller, EPA, from W. B. Papageorge, dated 2/10/71                                                                                                                                                                       |
| 1104     | 904521-<br>905076 | Statement of Dr. T. O. Munson dated 8/13/88                                                                                                                                                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                                                  |
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| 1105    | 905183-<br>905187 | Trip Report: National Conference on Polychlorinated Biphenyls, held 11/19-11/21/75, by W. A. Fessler                                                                                         |
| 1106    | 726959-<br>726961 | Monsanto Plays Policeman to Solve Environmental Problem; reprinted from <u>Chemical Week</u> , 4/21/71, author unknown                                                                       |
| 1107    | 736291-<br>736320 | Letter to D. McCrea from G. Steele, IN State Board of Health, dated 3/20/91; attached NIOSH Health Hazard Evaluation Report (HETA 89-116-2094), Westinghouse Electric Corp., Bloomington, IN |
| 1108    | 771394-<br>771395 | Letter to Bernard Leonka, United Electrical, Radio & Machine Workers of America, from Alf Fischbein, M.D., and Irving Selikoff, M.D., Mount Sinai School of Medicine, dated 8/4/77           |
| 1109    | 905237-<br>905238 | Corporate Administrative Committee 6/14/76 Meeting Minutes (Monsanto)                                                                                                                        |
| 1110    | 716921-<br>716937 | Preliminary Report of Inerteen Environmental Survey at Bloomington Distribution Apparatus Plant, prepared by T. O. Munson, undated.                                                          |
| 1111    | 900985-<br>900989 | Monsanto Visit 9/3/75                                                                                                                                                                        |
| 1112    | 716957-<br>716964 | Preliminary Report of Inerteen Environmental Survey at South Boston Transformer Plant, prepared by T. O. Munson, dated 3/9/72.                                                               |
| 1113    | 905239-<br>905469 | Occupational Exposure to Polychlorinated Biphenyls (PCBs); U. S. Dept. of Health, Education and Welfare; dated 9/77; (NIOSH) National Institute for Occupational Safety and Health           |
| 1114    | 900979-<br>900980 | Letter (illegible) to Babcock, Baker, Corley, Gainer, Herwald, Jordan, Kearns, J.C.R. Kelly, Mandelcorn, Munson, Sauter, Shoupp, Wiener from E. R. Boquist re attached data sheet            |
| 1115    | 729358-<br>729370 | Comparative Effects of Polychlorinated Biphenyls and Organochlorine Pesticides in Induction of Hepatic Microsomal Enzymes, Street, Urry, Wagstaff, and Blau, undated                         |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                        |
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| 1116    | 729436<br>729438  | Title: Monsanto Company Public Relations:<br>re: San Francisco Chronicle article about PCB<br>as "menacing new pollutant", undated                                                                                 |
| 1117    | 729463            | Letter from R.E. Keller to R. Baxter, CC to<br>Bergen, Lidgett, Mieure, Munch, Papageorge,<br>Richard, and Wood. Plan by Papageorge learn<br>more about chlorinated dibenzofurans in<br>Aroclor, dated August 1975 |
| 1118    | 729491-<br>729511 | PCB Environmental Pollution Abatement Plan,<br>result of October 15th "ad Hoc" Committee<br>consisting of Ferrar, Hodges, E. John,<br>Richard, and Wheeler; undated.                                               |
| 1119    | 729549            | Table titled "Aroclor Business to be<br>Discontinued Immediately, undated                                                                                                                                          |
| 1120    | 729578-<br>729580 | Historical Summary of PCB Environmental<br>Issues, by Papageorge, undated                                                                                                                                          |
| 1121    | 729658-<br>729663 | Agricultural Chemicals Newsletter from Acie<br>Waldron to State Staff and County of Columbus<br>Ohio; dated March 16, 1972                                                                                         |
| 1122    | 729665-<br>729668 | Monsanto's PCB Called Major Pollution Threat;<br>from W GK Today, Monsanto Co.; dated 4/13/70                                                                                                                      |
| 1123    | 732134-<br>732140 | Monsanto Worldwide Aroclor Business                                                                                                                                                                                |
| 1124    | 732941-<br>733175 | Final Report of the Subcommittee on the<br>Health Effects of Polychlorinated Biphenyls<br>and Polybrominated Biphenyls, dated July<br>1976, Dept. of Health, Education and Welfare,<br>Washington, D.C.            |
| 1125    | 733355-<br>733399 | Agriculture's Responsibility Concerning<br>Polychlorinated Biphenyls (PCBs); U.S. Dept.<br>of Agriculture, dated September 1972                                                                                    |
| 1126    | 734412            | Letter to Dorothy Hogan, American National<br>Standards Institute, Inc., from W. B.<br>Papageorge, dated 12/3/74                                                                                                   |
| 1127    | 734413            | Letter to Michael Sherwin, American National<br>Standards Institute, from W. B. Papageorge,<br>dated 8/6/74                                                                                                        |
| 1128    | 734414            | Letter to Charles Willmore, National<br>Electrical Manufacturers Association, from W.<br>B. Papageorge, dated 12/29/75                                                                                             |

| Exhibit | Bates No.         | Description                                                                                                                                                                |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1129    | 734415            | Letter to Charles Willmore, National Electrical Manufacturers Association, from W.B. Papageorge, dated 12/19/75                                                            |
| 1130    | 734416            | Letter to Charles Willmore, National Electrical Manufacturers Association, from W. B. Papageorge, dated 12/19/75                                                           |
| 1131    | 734417            | Letter to C. R. Willmore, National Electrical Manufacturers Association, from W. B. Papageorge, dated 10/28/75                                                             |
| 1132    | 734418            | Letter to Donald L. Peyton, American National Standards Institute, from A. M. Salazar, NEMA, dated 12/14/70                                                                |
| 1133    | 734419            | Letter to Donald L. Peyton, American National Standards Institute, from J. J. Kark, NEMA 1/26/71                                                                           |
| 1134    | 734424<br>734443  | IEEE Guide for Acceptance and Maintenance of Transformer Askarel in Equipment; by The Institute of Electrical and Electronics Engineers, Inc., dated 1974                  |
| 1135    | 734444            | Memo to J.F. Churchill (London) from J.N. Haggart (Brussels), dated 5/31/72                                                                                                |
| 1136    | 905653-<br>905654 | IBT Labs' Trial Reveals Faked Data; The Rise and Fall of IBT; by Keith Schneider, <u>In These Times</u> , dated May 1983                                                   |
| 1137    | 906112            | Monsanto Achievement Award Data Sheet for Paul Wright, signed by G. J. Levinskas on 7/16/76, approval date 8/4/76.                                                         |
| 1138    | 734445-<br>734448 | Letter to all representatives of member companies in the transformer section from A. M. Salazar, NEMA, dated 2/5/74                                                        |
| 1139    | 734449            | Letter to the voting representatives of member companies in the transformer and capacitor sections of the power equipment division from A. M. Salazar, NEMA, dated 3/21/73 |
| 1140    | 734450            | Letter to Bernard H. Falk, National Electrical Manufacturers Association, from H. S. Bergen, dated 12/5/72                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1141    | 734451-<br>734469 | Letter to ANSI C 107 Working Group on Capacitors (Benignus, McClain, Salazar, Kuzela, Clark, Papageorge, Hammer, Moore, Lengefeld, Doty, Rollins) from A. Pozefsky, General Electric Co., dated 3/1/72                                                                                                                                     |
| 1142    | 734470-<br>734475 | Personnel of American National Standards Institute Committee C107 on Use and Disposal of Askarel Fluid and Askarel-Soaked Materials                                                                                                                                                                                                        |
| 1143    | 734476            | (Hand-written notes) re Other Agencies                                                                                                                                                                                                                                                                                                     |
| 1144    | 734477-<br>734485 | Scope of ANSI C107; Objectives of ANSI C-107; Capacitor Guidelines (Aroclor 1016); Minimize Effluent Stream Contamination; Small Capacitors Containing Less Than 2 Pounds of Askarel; Large Capacitors Containing More Than 2 Pounds of Askarel; Scrap Askarel Fluid; Transformer Askarel; Caution Label for Askarel Transformers; undated |
| 1145    | 734486-<br>734489 | ANSI meeting minutes, prepared by A. M. Salazar, February 8 & 9, 1972                                                                                                                                                                                                                                                                      |
| 1146    | 734491-<br>734495 | ANSI meeting minutes, prepared by A. M. Salazar, 12/15/71                                                                                                                                                                                                                                                                                  |
| 1147    | 734496            | Letter to ANSI working group on capacitors (Clark, Hammer, Kuzela, McClain, Moore, Benignus, Papageorge, Salazar, Raab) from A. Pozefsky, General Electric Co., dated 12/3/71                                                                                                                                                              |
| 1148    | 905655-<br>905673 | Letter to D. McCrea from T. O. Munson, dated 8/11/88, with attached history of the Westinghouse PCB Survey, by T. O. Munson, dated 8/6/88                                                                                                                                                                                                  |
| 1149    | 734497-<br>734500 | ANSI meeting minutes, prepared by A. M. Salazar, 5/25/72                                                                                                                                                                                                                                                                                   |
| 1150    | 734501-<br>734502 | Memo to Crabtree, Grogan, Lengefeld, Shoulders, Onishi, Reinhardt, Rickley, Sloat, Benignus, Papageorge, Salazar from E. L. Raab, re ANSI C-107 Working Group on Transformers Industry Estimates for Askarel-Filled Transformers, dated 3/29/72                                                                                            |
| 1151    | 711523-<br>711524 | Letter to R. F. Casey, Ohio Edison Company, from W. B. Papageorge, dated 1/29/71                                                                                                                                                                                                                                                           |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                            |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1152    | 704148-<br>704149 | Letter to Ed Humbert, Westinghouse Electric Corp., from Paul W. Gann, Project Coordinator, Heat Transfer Fluids, dated 9/22/72                                                                                         |
| 1153    | 704130            | Letter to Clancy E. Jayne, Westinghouse Corp., from Paul W. Gann, Project Coordinator, Heat Transfer Fluids, dated 6/7/72                                                                                              |
| 1154    | 710356-<br>710358 | Study Group Calls for "Ban" on PCBs, by Francine Zeldman; source & date unknown                                                                                                                                        |
| 1155    | 702861-<br>702862 | Monsanto Co. Invoice No. 14-05-36135, dated 5/26/76                                                                                                                                                                    |
| 1156    | 715722-<br>715803 | The Toxicity of the Fogs Formed by Dropping Pydraul F-9, Aroclor 1248 and Tricresyl Phosphate, Upon the Surface of a Heated Inconel (Project 49); by Treon, Cleveland, Shaffer, Cappel, Gahegan, Wagner, dated 3/11/53 |
| 1157    | 734503-<br>734504 | Letter to Benignus, Dind, Forster, Gillies, Heinrichs, Kell, Kenoyer, Lowe, Margolis, Morrison, Mulhall, Preston, Schwab, Sloat from E. L. Raab, General Electric Co., dated 3/12/73                                   |
| 1158    | 734505-<br>734509 | NEMA meeting minutes, prepared by A. M. Salazar, 2/23/71                                                                                                                                                               |
| 1159    | 734510-<br>734511 | NEMA meeting notice, prepared by A. M. Salazar, 2/10/71                                                                                                                                                                |
| 1160    | 734512-<br>734513 | Chronological Steps With Respect to Initiation of an American National Standards Committee on Askarel Used in Electrical Equipment; author & date unknown                                                              |
| 1161    | 734518            | Memo to H. P. Michener from A. M. Salazar, dated 9/28/70                                                                                                                                                               |
| 1162    | 734517-<br>734520 | Letter to Donald L. Peyton, American National Standards Institute, from J. J. Kark, NEMA, dated 11/19/70                                                                                                               |
| 1163    | 734521-<br>734523 | PCB Pollution Proposed ANSI Committee Suggested, Composition, dated 11/18/70                                                                                                                                           |

| Exhibit     | Bates No.         | Description                                                                                                                                                                                                                                   |
|-------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1164        | 734524-<br>734526 | Letter to all respondents to the May 1, 1971 letter, establishing the ANSI Committee C107 on use and disposal of Askarel used in electrical equipment, from A. M. Salazar, ANSI, dated 8/12/71, & attach approved scope & proposed objectives |
| 1165        | 734527            | Letter to "Dear Sir" from A. M. Salazar, ANSI Committee, dated 5/1/71                                                                                                                                                                         |
| 1166        | 734528-<br>734543 | Monsanto's PCB Program, by W. B. Papageorge, presented at ANSI Committee C-107 Meeting, 9/14/71                                                                                                                                               |
| 1167        | 734547-<br>734552 | Personnel of ANSI Committee, C107 on Use and Disposal of Sakarel and Askarel-Soaked Materials                                                                                                                                                 |
| 1168<br>and | 734553-<br>734557 | Agenda for ANSI Committee, C107, on the Use Disposal of Askarel and Askarel-Soaked Materials in Electrical Equipment, scheduled for 1/12/76                                                                                                   |
| 1169        | 734560-<br>734561 | Letter to all members of the ANSI Committee, C107, on the use and disposal of Askarel and askarel-soaked materials, by A. M. Salazar, dated 7/24/73                                                                                           |
| 1170<br>C.  | 734562-<br>734568 | ANSI Committee meeting minutes, prepared by R. Willmore, dated January 12 & 13, 1976                                                                                                                                                          |
| 1171        | 734569-<br>734570 | (Agenda) prepared by P. G. Benignus for ANSI meeting re PCBs - Electrical Industry, 11/11/71                                                                                                                                                  |
| 1172        | 734571-<br>734586 | Monsanto's PCB Program, by W. B. Papageorge                                                                                                                                                                                                   |
| 1173        | 734587-<br>734622 | American National Standard: Guidelines for Handling and Disposal of Capacitor - and Transformer - Grade Askarels Containing Polychlorinated Biphenyls                                                                                         |
| 1174        | 734643-<br>734646 | PCBs- The Electrical Industry; Steering Committee - ANSI - C107 St. Louis, MO 11/11/71                                                                                                                                                        |
| 1175        | 734648-<br>734649 | Steering Committee of ANSI C107; Transformer (TR) and Capacitor Subcommittees; undated; names Benignus, Moore, Raab, Reinhardt                                                                                                                |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1176    | 734650            | American National Standards Committee, C107, on Use and Disposal of Askarel Used in Electrical Equipment; Approved Scope, and Proposed Objectives; names Papageorge, Salazar                                                                                                                                                                                                                                               |
| 1177    | 734651-<br>734654 | Letter to Dr. A. Posefsky, E. L. Raab from W. B. Papageorge, dated 2/2/72                                                                                                                                                                                                                                                                                                                                                  |
| 1178    | 734657            | Working Group on Capacitors of the ANSI Committee, C107, on Use and Disposal fo Askarel-Soaked Materials                                                                                                                                                                                                                                                                                                                   |
| 1179    | 734658-<br>734659 | Letter to Crabtree, Grogan, Lengefeld, Reinhardt, Rickley, Sloat, Benignus, Papageorge, Salazar from E. L. Raab, dated 12/9/71                                                                                                                                                                                                                                                                                             |
| 1180    | 734660            | Letter to Benignus, Clark, Hammer, Kuzela, Lengefeld, McClain, Moore, Papageorge, Rollins, Raab, Salazar Sodalski from A. Pozefsky, General Electric Co., dated 4/12/72                                                                                                                                                                                                                                                    |
| 1181    | 905635-<br>905645 | Letter to Dr. E. M. Kline from I. Matelsky, General Electric Co., dated 3/17/69; & attached articles: <u>Chlorinated Hydrocarbons in British Wildlife</u> , by Holmes, Simmons, Tatton; <u>Quasi-stellar Sources, Supernovae and Novae</u> , by Browne; <u>Organochlorine Pesticides in Seals and Porpoises</u> , by Holden, Marsden; <u>The North Pacific: an Example of Tectonics on a Sphere</u> , by McKenzie, Parker. |
| 1182    | 905646-<br>905648 | Minutes of Meeting of the corporate Development Committee, 11/17/69                                                                                                                                                                                                                                                                                                                                                        |
| 1183    | 700864-<br>700866 | Monsanto Sales Contract sold to General Electric Co. 1/1/71 to 12/31/71                                                                                                                                                                                                                                                                                                                                                    |
| 1184    | 733418-<br>733443 | Polychlorinated Biphenyls 1929-1979: Final Report, submitted to U.S. Environmental Protection Agency, submitted by VERSAR, INC., dated 5/16/79                                                                                                                                                                                                                                                                             |
| 1185    | 732201-<br>732210 | The PCT-Pollution Problem, January 21 and 22, 1970, St. Louis Meeting with General Electric Co., prepared by P. G. Benignus, dated 1/26/70                                                                                                                                                                                                                                                                                 |
| 1186    | 738129-<br>738130 | Department Hazardous Chemical Information, Depts. 246/259                                                                                                                                                                                                                                                                                                                                                                  |

| Exhibit | Bates No.          | Description                                                                                                                                                                   |
|---------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1187    | 738131-<br>738139  | Department 259 - Standard Manufacturing Process; Pyranols and Inerteens; Appendix J; unauthored & undated                                                                     |
| 1188    | 738166-<br>738172  | Process Description for the Manufacture of Aroclors & Pyrenols in Dept. A-246; including Operating Instructions; unauthored & undated                                         |
| 1189    | 738173-<br>738174  | Monsanto Chemical Company Operations Manual; II - Plant Procedures; Subject: Eye Protection (Safety Spectacles)                                                               |
| 1190    | 738140-<br>738146  | Partial document on Hazards. Toxicity of Aroclors; undated                                                                                                                    |
| 1191    | 738147-<br>738152  | Department 246 - Standard Manufacturing Process, Aroclor, Appendix J, Safety Equipment; undated                                                                               |
| 1192    | 738153-<br>738158  | Department 246 - Standard Manufacturing Process, Description, Section IV, Safety and Toxicity Data; undated                                                                   |
| 1193    | 713484 -           | Letter from R. Emmet Kelly to Dr. Herbert Blumenthal, FDA; dated 4/8/70                                                                                                       |
| 1194    | 741945 -<br>741969 | PCB Presentation to Corporate Development Committee; undated                                                                                                                  |
| 1195    | 105546-<br>105547  | Letter from Gossage, Director of Sales to Keith Kelly, Westinghouse dated 11/9/70                                                                                             |
| 1196    | 22116-<br>22133    | Memo and Attachment from Wheeler to Richard re: PCBs in the Environment, pre-published study by R.W. Risebrough titled Chlorinated Hydrocarbons in Marine Ecosystems 10/21/68 |
| 1197    | 729482-<br>729483  | Letter from Griffith Quinby, toxicologist to Emmet Kelly urging Monsanto to take a realistic view about PCBs and not conceal the truth                                        |
| 1198    | 738249-<br>738251  | Memo and attachment from W.A. Kuhn (Monsanto) to J. Molloy discussing toxicity and hazards; dated 4/14/69                                                                     |
| 1199    | 738316<br>738323   | Industrial Chemicals Co. Research & Development Report (Monsanto), Company Confidential. Aroclor Hazards include systemic poisoning and liver damage                          |

| Exhibit     | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1200        | 738223-<br>738231 | Process Description for the Manufacture of Aroclors In Dept. 246. Prepared by Harris. Supercedes July 20, 1965 version and amendments; dated 10/1966.                                                                                                                                                                                                                                                                                                                                          |
| 1201        | 738218-<br>738222 | Process Description for the Manufacture of Pyranols and Inerteens In Dept. 246. Prepared by Harris, Supercedes August 4, 1964 and amendments; dated 10/66                                                                                                                                                                                                                                                                                                                                      |
| 1202        | 703115            | Letter from Paul Benignus to Raab of GE dated 6/9/70                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1203        | 738187-<br>738189 | Hygienic Guide Series Chlorodiphenyls. January-February 1965                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1204        | 737135<br>737164  | Drinker, Cecil, The Problem of Possible Systemic Effects from Certain Chlorinated Hydrocarbons, Journal of Industrial Hygiene and Toxicology, 9/37.                                                                                                                                                                                                                                                                                                                                            |
| 1205        | 735881-<br>735894 | Letter to Dr. E. M. Kline from I. Matelsky, General Electric Co., dated 3/17/69; & attached articles: <u>Chlorinated Hydrocarbons in British Wildlife</u> , by Holmes, Simmons, Tatton; <u>Quasi-stellar Sources, Supernovae and Novae</u> , by Browne; <u>Organochlorine Pesticides in Seals and Porpoises</u> , by Holden, Marsden; <u>The North Pacific: an Example of Tectonics on a Sphere</u> , by McKenzie, Parker.                                                                     |
| 1206<br>the | 729577-<br>729657 | Polychlorinated Biphenyls A Presentation to Ontario Hydro Electric Commission, Canadian Interdepartmental Working Party on PCBs, Canadian Capacitor and Transformer Manufacturers, by Monsanto Canada, 11/72. Presentations: "Assessment of the Biological Persistence of Polychlorinated Biphenyls" by Papageorge, Tucker, and "What Happens to PCBs in the Environment?" by Munch and Papageorge, and PCB Changes in Dielectrics by C. Paton and ANSI C-107 Committee Activities by Benignus |
| 1207        | 734710<br>734711  | Letter from Papageorge to Renate Kimbrough dated 12/13/1974.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1208        | 729416<br>729417  | Monsanto's outline of proof for chlorinated biphenyls in the ecological system with two scenarios                                                                                                                                                                                                                                                                                                                                                                                              |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                             |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1209    | 728992-<br>729003 | Management Plan Polychlorinated Biphenyl Environmental Problem, Rough Draft                                                                                                                                                             |
| 1210    | 905992-<br>905996 | Aroclor Resins and Plasticizers for Chlorinated Rubber. Monsanto Technical Bulletin O-124, May 1957                                                                                                                                     |
| 1211    | 905649-<br>905652 | Letter to Hon. William F. Ryan, House of Representatives, from John Mason (last page missing) dated 6/30/70                                                                                                                             |
| 1212    | 905470-<br>905491 | Review of files retained at Industrial Hygiene Department at Research and Development Center, Westinghouse, prepared by Jeffrey J. Bair, Esq., and C. W. Bickerstaff, Mgr., Corp. Industrial Hygiene, Industrial Affairs, Westinghouse. |
| 1213    | 703004-<br>703006 | Memo to H. S. Bergen from T. L. Gossage, Monsanto, dated 2/8/72                                                                                                                                                                         |
| 1214    | 729033-<br>729075 | Industry Views on the Use of Polychlorinated Biphenyls in Transformers and Capacitors, prepared by the Office of Toxic Substances, U.S. EPA, June 1976                                                                                  |
| 1215    | 736718-<br>736748 | The Role of Polychlorinated Biphenyls in Electrical Equipment, prepared by General Electric Co., Schenectady, NY, dated 2/4/72                                                                                                          |
| 1216    | 736750-<br>736762 | The Need for Continued Use of Polychlorinated Biphenyls as Electrical Insulating Liquids, by E. R. Boquist, dated 1/3/72                                                                                                                |
| 1217    | 705716-<br>705717 | Letter to Harold Wolf, Westinghouse Electric Corporation, from C. F. Seger, Sales Representative, Specialty Products Group, dated 10/9/73                                                                                               |
| 1218    | 710335-<br>710346 | Review of the Technical and Regulatory Aspects of Aroclors, by J. C. Calandra, Ph.D., M.D., dated 6/27/75                                                                                                                               |
| 1219    | 725644            | Special Program on PCBs ballot, to Hasmukh C. Shah, Chemical Manufacturers Association, by John H. Craddock, undated                                                                                                                    |
| 1220    | 735412-<br>735425 | Polychlorinated Biphenyls - A Perspective, by John H. Craddock, Monsanto Co., 1/30/81                                                                                                                                                   |
| 1221    | 710645-<br>710648 | Monsanto Material Safety Data Sheet (MSDS), dated 9/15/80                                                                                                                                                                               |

| Exhibit | Bates No.         | Description                                                                                                                                                                              |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1222    | 714336-<br>714341 | Letter to Hearing Clerk, Food and Drug Administration, from John H. Craddock, dated 11/20/80                                                                                             |
| 1223    | 714334-<br>714335 | Letter to Hearing Clerk, Food and Drug Administration, from John H. Craddock, re amendment to FR45, dated 11/24/80                                                                       |
| 1224    | 725554<br>725559  | To Chemical Manufacturers Association Members Potentially Affected by Regulation of PCBs, by David Forsyth Zoll, dated 12/12/80                                                          |
| 1225    | 725550-<br>725553 | Letter to Phocion S. Park, Monsanto, from Janice K. Johnson, Chemical Manufacturers Association dated 12/30/80                                                                           |
| 1226    | 725637-<br>725643 | Letter to General Counsels Group, Chemical Regulations Advisory Committee, Environmental Management Committee, from David Forsyth Zoll, Chemical Manufacturers Association, dated 1/5/81 |
| 1227    | 725539-<br>725540 | Letter to Geraldine V. Cox, Chemical Manufacturers Association, from Phocion S. Park dated 1/28/81                                                                                       |
| 1228    | 734889-<br>734893 | Letter to Bill Rutledge, General Electric Co., from J. H. Craddock, dated 4/24/81                                                                                                        |
| 1229    | 725408-<br>725409 | Letter to Robert Roland, Chemical Manufacturers Association, from Louis Fernandez, Monsanto, dated 4/28/82                                                                               |
| 1230    | 725745            | Letter to Fensterheim, Chemical Manufacturers Association, from Paul R. Michael, dated 5/3/84                                                                                            |
| 1231    | 725755-<br>725761 | Statement of John Craddock to EPA Hearing on Proposed Regulations on PCB Transformer Use, dated 1/15/85                                                                                  |
| 1232    | 710631-<br>710637 | Monsanto Material Safety Data Sheets (MSDS), dated 10/15/85                                                                                                                              |
| 1233    | 734894-<br>734900 | Letter to Stephen B. Hamilton, General Electric Co., from Robert G. Kaley, Monsanto, dated 11/4/85                                                                                       |
| 1234    | 710638-<br>710643 | Monsanto Material Safety Data Sheets (MSDS), dated 10/1/88                                                                                                                               |

| Exhibit | Bates No.         | Description                                                                                                                                                          |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1235    | 715703-<br>715710 | Monsanto Material Safety Data Sheets (MSDS), issued 10/1/88, reprinted 10/92                                                                                         |
| 1236    | 706961-<br>706988 | Transformer Askarel Inspection & Maintenance Guide, prepared by Monsanto, revised August 1976                                                                        |
| 1237    | 729239-<br>729242 | Letter to Griffith E. Quinby, M.D., Consulting Toxicologist, from R. Emmet Kelly, M.D., in response to 1/20/71 letter                                                |
| 1238    | 735247-<br>735274 | Transformer Askarel Inspection & Maintenance Guide, prepared by Monsanto, revised March 1975                                                                         |
| 1239    | 734685-<br>734686 | Letter to Benignus, Dind, Forster, Gillies, Heinrichs, Keil, Kenoyer, Locke, Lowe, Margolis, Morrison, Mulhall, preston, Schwab, Sloat from E. L. Raab, dated 2/7/73 |
| 1240    | 734683-<br>734684 | Letter to E. L. Raab, General Electric Co., from T. K. Sloat, Westinghouse Electric Corp., dated 8/30/72                                                             |
| 1241    | 705580-<br>705581 | Letter to George Hvizdos, Westinghouse Electric Corp., from Randall Graham, dated 7/20/70                                                                            |
| 1242    | 705642-<br>705643 | Memo to Field, Ford, Gossage, Jordan, Marcum, Mellon, Paton, Petrilli, Rutherford, Slayton, Wood from "G." dated 2/10/75                                             |
| 1243    | 700871            | Monsanto Mic Order, undated, states "PCB warning must appear on B-L"                                                                                                 |
| 1244    | 700045-<br>700047 | Sample Shipping Receipt from Monsanto to General Electric dated 12/18/72, Invoice date 12/19/72. Invoice No. 14-12-80943.                                            |
| 1245    | 738152-<br>738165 | Tentative Process for the Continuous Manufacture of Aroclor 1242 at the W.G. Krummrich Plant; undated                                                                |
| 1246    | 729570-<br>729576 | Of PCB ppms from GE and a SNAFU from EPA and DEC, Article from Audubon, 11/75 by Richard Boyle                                                                       |
| 1247    | 706901-<br>706928 | Monsanto ASKAREL Inspection and Maintenance Guide; undated                                                                                                           |

| Exhibit | Bates No.         | Description                                                                                                                                                        |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1248    | 906154-<br>906156 | Letter to A. Pozefsky, General Electric Co., from Robert D. McClain, dated 3/1/72; attached Minutes of Meeting 2/8/72                                              |
| 1249    | 738438-<br>738450 | Memo to Gossage, Hosmer, Papageorge, Park, Paton, W.R. Richard, Savage, Tucker, Wright from H. S. Bergen, dated 3/8/74                                             |
| 1250    | 705748-<br>705773 | Technical Bulletin: The Aroclor Polychlorinated Polyphenyls, prepared by Monsanto; undated                                                                         |
| 1251    | 734725-<br>734727 | Memo to "For the Record" from Richard A. Rhoden, Senior Research Reviewer, DCDS, dated 1/13/76                                                                     |
| 1252    | 703112            | Letter to E. L. Raab from Donald A. Olsen, Sales Director, Functional Fluids, dated 5/4/70                                                                         |
| 1253    | 740968-<br>740974 | 1) Evidence of Problem; 2) Toxicological Aspects; 3) Persistence or Lack of Biodegradation; 4) Pressures Which Will Affect Sales and Use of Aroclors 1254 and 1260 |
| 1254    | 703083-<br>703084 | Letter to Edward L. Raab from W. B. Papageorge, dated 11/4/71 re (unattached) acute toxicity and chronic toxicity studies sponsored by Monsanto                    |
| 1255    | 703146            | Letter to Donald Winn, Purchasing Agent, Westinghouse Electric Corp., from J. A. Alley, Monsanto, dated 9/22/77                                                    |
| 1256    | 905926-<br>905990 | Summary of Deposition of W.B. Papageorge taken on 6/25/87.                                                                                                         |
| 1257    | 905991            | Letter from L.A. Watt dated 10/11/37                                                                                                                               |
| 1258    | 729030-<br>729032 | Article entitled "Identification of Chlorinated Dibenzofurans in American Polychlorinated Biphenyls." Article in Nature, published 7/24/75.                        |
| 1259    | 736459            | Letter from Clark to Dr. Jenkins of Monsanto dated 4/4/41.                                                                                                         |
| 1260    | 729076-<br>729089 | Transcription of Nova production sent from Broadcast Information Services, Inc. ordered by Monsanto. Dated 10/2/79.                                                |

| Exhibit | Bates No.         | Description                                                                                                                                                          |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1261    | 710961            | Letter from Jack Garrett to Wilbur Speicher dated 11/1/67.                                                                                                           |
| 1262    | 737114-<br>737120 | General Electric Technical Information Series dated 3/27/56 regarding Pyranol.                                                                                       |
| 1263    | 700110            | Shipping Bill from Monsanto to General Electric dated 2/13/74.                                                                                                       |
| 1264    | 905997-<br>906032 | PCBs NIOSH Inspection of Monsanto and related correspondence.                                                                                                        |
| 1265    | 776320-<br>776321 | Letter to E. W. Bogins from E. L. Raab, General Electric, dated 10/1/74                                                                                              |
| 1266    | 776311-<br>776319 | Trip Report #7-74 prepared by C. A. Burkhard, dated 3/8/74                                                                                                           |
| 1267    | 776275            | Letter from Bergen, Monsanto to Rice, GE, dated 1/3/72.                                                                                                              |
| 1268    | 776249-<br>776261 | Comments by GE to EPA on "Proposed Toxic Pollutant Effluent Standards for Polychlorinated Biphenyls" (41 FR 30468, July 23, 1976)                                    |
| 1269    | 775582-<br>775586 | Pyranol Update, confidential, GE employees only; undated                                                                                                             |
| 1270    | 775580            | Letter from Frahm, GE to Sales Managers, Engineers. Dated 5/22/72. Information Letter - MT - 168. Subject: Pyranol Update                                            |
| 1271    | 775249-<br>775262 | Memo from McAllister to Young, dated 3/4/76. Re: PCB Roundup. Attachments also.                                                                                      |
| 1272    | 775244-<br>775246 | Cover letter form R.F. Quinn, Manager, National Sales, to all agents and distributors. Dated 5/11/70. Attachment is general/open letter to all industrial customers. |
| 1273    | 775247            | Handwritten letter from Arthur Glowka, dated 6/30/77 to H. Jones.                                                                                                    |
| 1274    | 775235            | Letter from McCahill, GE counsel to district managers. Dated 5/5/70                                                                                                  |
| 1275    | 775213            | Letter from Raab, GE to Dengler, Moe, Gaither, Morgan, Frahm, Mayes, Church, Dutton, Lee, Meloun, Sweeny. Dated 8/7/72.                                              |

| Exhibit | Bates No.         | Description                                                                                                                                                                      |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1276    | 775157-<br>775166 | Section 3, TRANSFORMER GUIDELINES, of Guidelines for Handling and Disposal of Capacitor and Transformer-Grade Askarels Containing Polychlorinated Biphenyls. Undated, no author. |
| 1277    | 775146-<br>775155 | Section 2: CAPACITOR GUIDELINES, of Guidelines for Handling & Disposal of Capacitor & Transformer Grade Askarels Containing Polychlorinated Biphenyls. Undated, no author.       |
| 1278    | 775129-<br>775134 | Memo from Anderson, GE Product Sales Engineer to Engel & McCall. Dated 10/19/73.                                                                                                 |
| 1279    | 775095<br>775098  | Memo from Nelson, GE, to Christiansen, Clarke, Corbin, Farrell, Hupean, Hart, Morris, Petersen, Rankine, Tackaberry, Thomas, Van Dyck. Dated 7/24/72.                            |
| 1280    | 735877-<br>735878 | Letter from S.B. Hamilton, GE, to Dr. Millar, NIOSH. Dated 11/22/82.                                                                                                             |
| 1281    | 735879            | Letter from Millar, NIOSH to Hamilton, GE, dated 1/26/83.                                                                                                                        |
| 1282    | 729448-<br>729452 | Article from New York Times, dated 8/8/75. By Richard Severo. "State Says Some Striped Bass and Salmon Pose a Toxic Peril." Retyped.                                             |
| 1283    | 732273-<br>732275 | Article from New York Times, dated 1976, by Peter Hellman. Under "Quality of Life CHALLENGES"                                                                                    |
| 1284    | 775090-<br>775093 | GE Instructions: PYRANOL for use in Transformers, Regulators and Reactors. Publication No. GEI-28006C Pyranol. Dated 5/54                                                        |
| 1285    | 775074-<br>775075 | Operating Instructions from Donega, GE, dated 9/1/72. Re: The Use and Handling of Pyranol. Prepared by Manager - Safety & Environmental Programs.                                |
| 1286    | 775071-<br>775073 | Memo, GE, Rome, GA plant. Dated 8/1/72. 3 page memo on Pyranol Containment.                                                                                                      |
| 1287    | 771422            | ITEMS OF INTEREST, dated 10/5/71. Special Union Meeting on Pyranol.                                                                                                              |
| 1288    | 771423            | Letter from Hart of GE to Glowka. Dated 7/14/77.                                                                                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                  |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1289    | 771425-<br>771438 | Draft letter to Dr. Selikoff from Dr. Casey. Undated. Re: proposed study between Mt. Sinai and GE on pyranol/PCBs.                                           |
| 1289A   | 771424            | GE Cover letter to 1289 from John Brown of Physical Chemistry Lab, to J.P. Welch, V.P. of Components and Materials Group. Dated 3/21/77.                     |
| 1290    | 771441-<br>771444 | Memo from Casey, M.D. to Welch. Dated 7/20/77. Four pages.                                                                                                   |
| 1291    | 771445            | Notes: Regarding telephone conversation with Dr. Feingold regarding Medical Surveillance Program for Employees Exposed to PCBs. Dated 1/16/76.               |
| 1292    | 771450-<br>771456 | Cover letter from Selikoff, Mt. Sinai to Welch, GE dated 8/3/77. Attached is outline plan describing proposed approach to investigating PCB health effects   |
| 1293    | 771462-<br>771463 | Letter from Selikoff, M.D., Fischbein, M.D. of Mt. Sinai to Leonka, Local 332 United Electrical, Radio & Machine workers of America.                         |
| 1294    | 771473-<br>771484 | Report titled REVIEW OF PCB IMPACT AND PROGRAMS by Capacitor Products Dept. GE, Hudson Falls, NY. Presented by Hart, Jr.                                     |
| 1295    | 771489-<br>771496 | GE memo dated 9/17/73. No. A-1.51. Re: Environmental Protection Policy. Prepared by Manager, Tech. Planning & Comm. Relations. Supersedes No. A-1.51, 4/1/72 |
| 1296    | 771498-<br>771499 | GE Capacitor Products Department News, Hudson Falls, NY. Special Edition, dated 9/8/75. "State Issues Abatement Order Against GE"                            |
| 1297    | 771500-<br>771510 | GE Capacitor Dept. Instructions: Safety Rules for Handling and Use of Pyranols. Dated 1/11/68. Written by G.A.Smith, Issued by Dunham.                       |
| 1298    | 771517-<br>771518 | BULLETIN: Plans for the Testing Program are taking Final form as Follows. Dated 3/12/76. Attachment reads "Development in PCBs" UE Local 332.                |
| 1299    | 771537-<br>771538 | Letter from Slater of GE to Hinton, W1A. Dated 11/4/76.                                                                                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                      |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1300    | 905674-<br>905679 | The American Journal of Hygiene, Vol. 27, 1938: Liver Lesions Caused by Chlorinated Naphthalene, by Frederick B. Flinn, Norman E. Jarvik                                                                                                                                                                         |
| 1301    | 905680-<br>905686 | American Journal of Public Health, June 1936: Dermatitis from Synthetic Resins and Waxes, by Louis Schwartz, M.D., F.A.P.H.A.                                                                                                                                                                                    |
| 1302    | 905687-<br>905689 | Environmental Health Perspectives, April 1972: Levels of Polychlorinated Biphenyls in Adipose Tissue of the General Population of the Nation, by Anne R. Yobs, M.D.                                                                                                                                              |
| 1303    | 905690-<br>905695 | Environmental Health Perspectives, April 1972: Occurrence of Polychlorinated Biphenyls in Humans, by Harold A. Price, Robert L. Welch                                                                                                                                                                            |
| 1304    | 905696-<br>905705 | (Source illegible) Vol. 3, No. 5, 1975: Effect of Chlorination on the Distribution and Excretion of Polychlorinated Biphenyls, by H. B. Matthews, M. W. Anderson                                                                                                                                                 |
| 1305    | 905706-<br>905708 | Toxicology and Applied Pharmacology 36, 560 (1976): The Influence of Molecular Structure on the Retention and Excretion of Polychlorinated Biphenyls by the Mouse, by John C. Gage, Stina Holm                                                                                                                   |
| 1306    | 905709-<br>905715 | Arch Environ Health, Vol. 29, December 1974: Polychlorinated Biphenyls; Storage, Distribution, Excretion, and Recovery: Liver Morphology After Prolonged Dietary Ingestion, by Virlyn W. Burse, Renate D. Kimbrough, M.D., Ellen C. Villanueva, MS, Ralph W. Jennings, Ralph E. Linder, G. Wayne Sovocool, Ph.D. |
| 1307    | 905716-<br>905720 | Bull. Environm. Contam. Toxicol. 28, 105-112 (1982): Accumulation of Polychlorinated Biphenyls by Saccharomyces cerevisiae and Their Effects on Lipid Biodynesis; by G. Baluja, L. M. Hernandez, Ma. J. Gonzalez                                                                                                 |
| 1308    | 905721-<br>905725 | Nature, Vol. 220, 12/14/68: Polychlorinated Biphenyls in the global Ecosystem, by R. W. Risebrough, P. Rieche, D. B. Peakall, S. G. Herman, M. N. Kirven                                                                                                                                                         |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1309    | 905726-<br>905732 | Bull. Environm. Contam. Toxicol. 21,381-387 (1979): Presence of Polychlorinated biphenyl and Organochlorine Pesticide Residues and the Absence of Polychlorinated Terphenyls in Canadian Human Milk Samples, by Jos Mes, David J. Davies                   |
| 1310    | 905733-<br>905737 | Bull. Environm. Contam. Toxicol. 28, 573-577 (1982): Presence of Organochlorine Pesticides, Polychlorinated Biphenyls, and Mercury in Spanish Human Milk Samples, by G. Baluja, L. M. HJernandez, Ma. J. Gonzalez, Ma. C. Rico                             |
| 1311    | 905738-<br>905788 | Annals New York Academy of Sciences, 1979: World PCBs Map: Storage and Effects in Man and His Biologic Environment in the 1970s, by Marcus Wassermann, Dora Wassermann, Similica Cucos, Howard J. Miller                                                   |
| 1312    | 905789-<br>905794 | Journal of Occupational Medicine, Vol. 27, No. 5, May 1985: PCB-Containing Transformer Fires: Decontamination Guidelines Based on Health Considerations, by Thomas H. Milby, M.D., M.P.H., Terry L. Miller, Ph.D., P.E., Thomas L. Forrester, M.E.S., M.S. |
| 1313    | 905795-<br>905798 | Journ. A.M.A., 5/15/43: An Outbreak of Halowax Acne ("Cable Rash") Among Electricians, by Louis Schwartz, M.D.                                                                                                                                             |
| 1314    | 905799-<br>905804 | Toxicology and Applied Pharmacology 44, 41-51 (1978): Effect of Polychlorinated Biphenyls on the Immune Responses of Rhesus Monkeys and Mice, by Peter T. Thomas, Ronald D. Hinsdill                                                                       |
| 1315    | 905805-<br>905808 | Toxicology and Applied Pharmacology, 21, 549-555 (1972): Immunosuppressive Activity of a Polychlorinated Biphenyl Preparation on the Humoral Immune Response in Guinea Pigs, by J. G. Vos, Th. Dr Rolj                                                     |
| 1316    | 905809-<br>905817 | Dermal Toxicity Studies of Technical Polychlorinated Biphenyls and Fractions Thereof in Rabbits, by J. G. Vos, R. B. Beems, 1970                                                                                                                           |
| 1317    | 905818-<br>905823 | The Comparative Biologic and Toxic Potencies of Polychlorinated Biphenyls and Polybrominated Biphenyls, by J. Andres, L. Lambert, L. Robertson, S. Bandiera, T. Sawyer, S. Lovering, S. Safe, 1983                                                         |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                   |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1318    | 905824-<br>905833 | Toxicity of Chlorinated Biphenyls, by Lawrence Fishbein, 1974                                                                                                                                                                                                                                                 |
| 1319    | 905834-<br>905841 | Archives of Dermatology and Syphilology, Vol. 48, No. 3, September 1943: Halowax Acne ("Cable Rash"), by Charles Kemm Good, M.D., Nathan Pensky, M.D.                                                                                                                                                         |
| 1320    | 905842-<br>905857 | Public Health Bulletin No. 229, September 1936; Skin Hazards in American Industry, Part II, by Louis Schwartz (Prepared by Direction of the Surgeon General)                                                                                                                                                  |
| 1321    | 905858-<br>905860 | Predictability of PCBs in Carp Harvested in Saginaw Bay, Lake Huron, by Mary E. Zabik, Cynthia Merrill, Matthew J. Zabik (undated)                                                                                                                                                                            |
| 1322    | 905861-<br>905873 | Archives of Dermatology and Syphilology (undated): An Acneform Dermatogosis, by Jack W. Jones, M.D., Herbert S. Alden, M.D.                                                                                                                                                                                   |
| 1323    | 905874-<br>905882 | Xenobiotica, 1985, Vol. 15, No. 1, 67-75: Enhanced Metabolism of Volatile Hydrocarbons in Rat Liver Following Food Deprivation, Restricted Carbohydrate Intake, and Administration of Ethanol, Phenobarbital, Polychlorinated Biphenyl and 3-Methylcholanthrene: A Comparative Study, by A. Sato, T. Nakajima |
| 1324    | 905883-<br>905890 | Journal of Medicinal Chemistry, 1986, Vol. 29, No. 5, 641-648: Structurally Specific Binding of Halogenated Biphenyls to Thyroxine Transport Protein, by Urs. Rickenbacher, James D. McKinney, Stuart J. Oatley, Colin C. F. Blake                                                                            |
| 1325    | 905891-<br>905895 | Biochemical Pharmacology, Vol. 24, 779-783, 1975: Microscope Immersion Oils: Effects of Skin Application on Cutaneous and Hepatic Drug-Metabolizing Enzymes, by David R. Bickers, Julie Eiseman, Attallah Kappas, Alvito P. Alvares                                                                           |
| 1326    | 905896-<br>905901 | Environmental Health Perspectives, Vol. 59, 107-112, 1985: Inducing Potency of Aryl Hydrocarbon Hydroxylase Activity in Human Lymphoblastoid Cells and Mice by Polychlorinated Dibenzofuran Congeners, by Junya Nagayama, Chikako Kiyohara, Yoshito Masuda, Masanori Kuratsune                                |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                    |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1327    | 905902-<br>905905 | Anesthesiology 51:95-96, 1979: A Possible Interaction of PCB and Halothane in Man, by Howard L. Zauder, M.D.                                                                                                                                                                                                   |
| 1328    | 905906-<br>905908 | Journal of the National Cancer Institute, Vol. 53, No. 2, August 1974: Induction of Adenofibrosis and Hepatomas of the Liver in BALB/cJ Mice by Polychlorinated Biphenyls (Aroclor 1254), by Renate D. Kimbrough, M.D., Ralph E. Linder                                                                        |
| 1329    | 905909-<br>905917 | Toxicology and Applied Pharmacology, Vol. 32 (1975): Alteration of Induced Cellular and Humoral Immune Responses by Pesticides and Chemicals of Enironmental Concern: Quantitative Studies of Immunosuppression by DDT, Aroclor 1254, Carbaryl, Carbofuran, and methylparathion, by J. C. Street, R. P. Sharma |
| 1330    | 905918-<br>905923 | Cancer Letters, 15 (1982) 185-189: Promotion by Polychlorinated Biphenyls of Enzyme-Altered Foci in Rat Liver, by Michael A. Pereira, Sydna L. Herren, Alfred L. Britt, Marlene M. Khoury                                                                                                                      |
| 1331    | 776328-<br>776330 | Memo to Field Sales District Managers, Engineers, and Selected Product Department Sales Managers, International Sales Division, FASO, I&SE & Service Shop Personnel, from H. J. Pinson, General Electric Co., dated 4/18/72                                                                                    |
| 1332    | 776332-<br>776339 | Report on Liquid Dielectric and Cooling Medium, General Elecric, Co., Schenectady, NY, dated 11/9/49                                                                                                                                                                                                           |
| 1333    | 776360-<br>776367 | Report on Liquid Dielectric and Cooling Mediums, General Electric Co., Schenectady 5, NY, dated 3/16/44                                                                                                                                                                                                        |
| 1334    | 772272-<br>772273 | Open Letter to Electric Utility Customers, from GE, undated. Discuss public concern over PCB pollution. Gives suggestions on what to do with PCB waste. Attached warning label.                                                                                                                                |
| 1335    | 906102            | Letter to Garlington Wilburn, Westinghouse, from W. B. Papageorge, dated 7/6/90                                                                                                                                                                                                                                |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                   |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1336    | 772294-<br>772297 | Instructions: Pyranol Insulating Liquid, for Use in Transformers, Regulators and Reactors (General Electric, undated)                                                                                                                                                         |
| 1337    | 713309-<br>713321 | Letter to Paul E. Heisler, Monsanto, from Mark W. Jones, Dept. of Health, Education, and Welfare, dated 5/10/77, re attached Industrial Hygiene Survey of the PCB Production Operation conducted at the Monsanto W. G. Krummrich plant on 7/21 & 7/22/76, report dated 5/6/77 |
| 1338    | 772537-<br>772538 | Pyranol: Characteristics of Transformer, Regulator, and Capacitor Pyranol (article by General Electric, undated)                                                                                                                                                              |
| 1339    | 772435            | Warning label from General Electric production re insulating fluid in transformer contains PCBs . . .                                                                                                                                                                         |
| 1340    | 772547-<br>772551 | Pyranol Insulating Liquid (article by General Electric, undated)                                                                                                                                                                                                              |
| 1341    | 772423-<br>772425 | Memo to Field Sales Engineers from W. B. Gaither & R. W. Frahm, General Electric, dated 1/11/77, re PCBs in Oil; memo to Transformer Purchasers from Gaither & Frahm, undated, re PCBs in Oil                                                                                 |
| 1342    | 773818-<br>773872 | Critical Reviews in Toxicology (1974): The Toxicity of Polychlorinated Polycyclic Compounds and Related Chemicals, by Renate D. Kimbrough                                                                                                                                     |
| 1343    | 773378-<br>773421 | Corporate Research and Development (General Electric), dated July 1976: A Bibliography of Papers Related to the Biological Effects of Polychlorinated Biphenyls, by W. Dexter Bellamy                                                                                         |
| 1344    | 773449-<br>773456 | Rubber Age, Vol. 33, No. 5, August 1943: Observations on the Toxic Effects Resulting from Exposure to Chlorinated Naphthalene and Chlorinated Phenyls with Suggestions for Prevention, by H. Von Wedel, William A. Holla, James Denton                                        |
| 1345    | 773566-<br>773569 | Nature Vol. 220, 12/14/68: Polychlorinated Biphenyls in the Global Ecosystem, by R. W. Risebrough, P. Rieche, D. B. Peakall, S. G. Herman, M. N. Kirven                                                                                                                       |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                             |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1346    | 773789-<br>773817 | Medical Research Project No. MR-46, dated 3/28/38: The Toxicity and Potential Dangers of Inerteen, by W. F. Von Oettingen                                                                                               |
| 1347    | 773194            | Letter to E. J. Putzell, Monsanto Co., from Walter A. Schlotterbeck, General Electric, dated 1/21/72                                                                                                                    |
| 1348    | 773220-<br>773222 | Letter to G. N. Bull, General Electric, from W. A. Fessler, dated 7/12/79                                                                                                                                               |
| 1349    | 774153-<br>774154 | Letter to Division General Managers, Department General Managers from R. B. Ames, C. J. Meloun, L. C. Maier, Jr. (General Electric) dated 4/10/70                                                                       |
| 1350    | 774069-<br>774071 | Letter to P. G. Benignus, Monsanto, from Edward L. Dobbins, General Electric, dated 4/15/70                                                                                                                             |
| 1351    | 736000            | Letter to Fredrick W. Kutz, EPA, from S. B. Hamilton dated 5/19/83                                                                                                                                                      |
| 1352    | 906033-<br>906034 | Industrial Medicine, Vol. 13, January 1944: Chlorinated Compounds - Precautions in Handling, by A. G. Cranch                                                                                                            |
| 1353    | 906035-<br>906046 | Industrial Medicine, Vol. 12, No. 8, August 1943: Chlorinated Naphthalenes and Diphenyls, by Leonard Greenburg                                                                                                          |
| 1354    | 906038-<br>906039 | Journal of the American Medical Association, Vol. 154, No. 17, 4/24/54: Chloracne From an Unusual Exposure to Arochlor, by J. Wister Meigs, Jack Jonathan Albom, Bernard L. Kartin                                      |
| 1355    | 906040-<br>906046 | Journal of American Medical Association, Vol. 125, No. 3, 5/20/44: Dermatitis From Cutting Oils, Solvents and Dielectrics, Including Chloracne, by Samuel M. Peck                                                       |
| 1356    | 906047-<br>906056 | Journal of Industrial Hygiene and Toxicology, Vol. 21, No. 2, February 1939: The Systemic Effects Resulting From Exposure to Certain Chlorinated Hydrocarbons, by Leonard Greenburg, May R. Mayers, Adelaide Ross Smith |
| 1357    | 906057-<br>906068 | Journal of Industrial Hygiene and Toxicology, Vol. 20, No. 3, March 1938: Skin Conditions Resulting From Exposure to Certain Chlorinated Hydrocarbons, by May R. Mayers, Mabel G. Silverberg                            |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1358    | 906069-<br>906076 | New York State Journal of Medicine, Vol. 43, 9/15/43: Occupational Acne, by Louis Schwartz, Samuel M. Peck                                                                                                                                                                                                                                                                                                                                 |
| 1359    | 906077-<br>906087 | New York State Journal of Medicine, Vol. 34, No. 21, 11/1/34: Acneform Eruptions, With Remarks on Acne Vulgaris and its Pathogenesis, by Marion B. Sulzberger, Adolph Rostenberg, Jr., J. J. Sher                                                                                                                                                                                                                                          |
| 1360    | 906088-<br>906095 | Pennsylvania Department of Labor and Industry, Special Bulletin No. 43, 3/16/36: A Preliminary Report of the Dermatological and Systemic Effects of Exposure to Hexachloro-Naphthalene and Chloro-Diphenyl, by William B. Fulton, Julia L. Matthews                                                                                                                                                                                        |
| 1361    | 906096-<br>906098 | Public Health Reports, Vol. 57, No. 47, 11/20/42: Chloracne From Cutting Oils, by Louis Schwartz, Frank A. Barlow                                                                                                                                                                                                                                                                                                                          |
| 1362    | 906099-<br>906101 | Proceedings of the Society for Experimental Biology and Medicine, Vol. 35, 1936: Action of Certain Chlorinated Naphthalenes on the Liver, by F. B. Flinn, N. E. Jarvik                                                                                                                                                                                                                                                                     |
| 1363    | 736287-<br>736290 | Archives of Environmental Health, Vol. 44, No. 6, November/December 1989: Half-Life of Polychlorinated Biphenyls in Occupationally Exposed Workers, by D. L. Phillips, A. B. Smith, V. W. Burse, G. K. Steele, L. L. Needham, W. H. Hannon                                                                                                                                                                                                 |
| 1364    | 732269-<br>732272 | Sports Illustrated, 9/1/75: Poisoned Fish, Troubled Waters, by R. H. Boyle                                                                                                                                                                                                                                                                                                                                                                 |
| 1365    | 729693-<br>729700 | Minutes of PCB Ad Hoc Committee Meeting, January 7 and 8, 1976 Held in Washington, D.C., dated 1/12/76, prepared by Clifford H. Tuttle                                                                                                                                                                                                                                                                                                     |
| 1366    | 737815-<br>737823 | Material Safety Data Sheet for Aroclor 1254 by General Electric, 5/80 <ul style="list-style-type: none"> <li>a. 737817-737819 MSDS Product Identification, Manufacturer, GE., undated.</li> <li>b. 737820-737821 MSDS from GE for chlorinated biphenyls, chlorinated benzenes; Pyranol, Aroclor. Undated.</li> <li>c. 737822-737823 MSDS from GE for chlorinated biphenyl/chlorinated benzene blend; Pyranol, Aroclor. Undated.</li> </ul> |

| Exhibit | Bates No.         | Description                                                                                                                                                                              |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1367    | 736528-<br>736532 | Letter to Joseph J. Merenda, EPA, from S. B. Hamilton, dated 10/1/87                                                                                                                     |
| 1368    | 906103-<br>906111 | Memo to "Attached Sheet" (not provided) from D. E. Hutchinson, dated 12/29/75; attached article from 11/75 Audobon: Of PCB ppms from GE and a SNAFU from EPA and DEC, by Robert H. Boyle |
| 1369    | 737165-<br>737169 | Science, Vol. 236, 5/8/87: Polychlorinated Biphenyl Dechlorination in Aquatic Sediments, by J. F. Brown, Jr., D. L. Bedard, M. J. Brennan, J. C. Carnahan, H. Feng, R. E. Wagner         |
| 1370    | 737170-<br>737175 | Environmental Health Perspectives, Vol. 60, 1985: Occupational Exposure to PCBs, by M. S. Wolff                                                                                          |
| 1371    | 736770-<br>736800 | Human Health Effects of Electrical-Grade PCBs prepared by General Electric, by J. F. Brown, Jr., J. T. Coe, H. D. Pocock, Jr., dated August 1981                                         |
| 1372    | 736801-<br>737009 | Potential Health Effects in the Human from Exposure to PCBs and Related Impurities, by Drill, Friess, Hays, Loomis & Shaffer, Inc., dated 2/12/82                                        |
| 1373    | 775298-<br>775525 | Occupational Exposure to Polychlorinated Biphenyls, prepared by NIOSH, dated September 1977                                                                                              |
| 1374    | 737184-<br>737188 | American Industrial Hygiene Association Journal, (43) March 1982: Polychlorinated Biphenyl Exposure in Transformer Maintenance Operations, by C. L. Moseley, C. L. Geraci, J. Burg       |
| 1375    | 200472-<br>200477 | Paper: information presented at forum (L.WV.) 5/11/76 by R. Anderson, author unknown                                                                                                     |
| 1376    | 200478-<br>200484 | Memo to D.M. Sauter from Vince Rinaldi, dated 4/5/76                                                                                                                                     |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                         |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1377    | 901024-<br>901027 | Meeting with Monsanto on Inerteen, dated 12/16/71; Monsanto people, Bill Richards, Ralph Munch, Paul Benignus, Bill Pappageorge, Scott Tucker, E.P. Wheeler; Westinghouse people, Don Sauter, Don McClain, Tom Dakin, Gordon Gainer, Lyon Mandelkorn, Ed Boquist, Dave Kaiser, T.O. Munson, Jack Kelley, T.K. Sloat |
| 1378    | 200485-<br>200509 | Letter and mailing list from D. E. Buettner with Economic Impact of Alternatives to PCBs attached mailed to Aldworth, Keiser, Wilburn, Plaster, Sauter, Bean, Brittain, Harder, Lawrence, Nickel, Buettner, LaDronka, dates 2/13/76                                                                                 |
| 1379    | 200671-<br>200673 | Consideration of Bio and Non-Biodegradeable PCBs, unsigned, which supercedes memo of 10/14/71                                                                                                                                                                                                                       |
| 1380    | 200666-<br>200667 | Memo from Sharon Works, South Boston Plant, J. G. Aldworth, signed by J. C. Rissinger, subject, Interteen - Environmental Contamination, dated 8/5/70                                                                                                                                                               |
| 1381    | 906113-<br>906114 | Memo from J.H. Pickett of Bloomington re Inerteen Control Alert to J. Curt, D. Swafford, C. Mitchell, P. Massy, L. Nichols, R. Crowe, N. Maguire, T. Dyer, E. Mallick, R. Hogan, R. Sawyer, D. McClain, K. Kelly, L. Shoaff, W. Conaway, D. Cox, dated 12/17/71                                                     |
| 1382    | 710872-<br>710873 | Monsanto letter by J.W. Kleffner re Aroclor to be returned for incineration dated 5/29/74                                                                                                                                                                                                                           |
| 1383    | 703132            | Letter from Pappageorge to Gordon Gainer re PCB problems and withdrawal of Aroclor 4465, dated 10/5/70                                                                                                                                                                                                              |
| 1384    | 906124-<br>906124 | Letter from D. E. Buettner to J.G. Aldworth, D.F. Keiser, G.C. Wilburn, R. L. Plaster, D. M. Sauter, F. A Bean, J. B. Brittain, J. E. Buettner, J. A. LaDronka, M. J. McDonough, J. A. Moore, M. D. Gill, R. E. Wills with revised draft of Economic Impact of Alternatives to PCBs, dated 3/1/76                   |
| 1385    | 200674-<br>200675 | Letter from Robert D. McClain to J.B. Brittain, Bloomington Works, dated 10/27/71                                                                                                                                                                                                                                   |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1386    | 100510-<br>200521 | A Series of Talks Presented at the Westinghouse Distribution Apparatus Division to State and Local Officials; Why PCBs in Electrical Equipment by D.M. Sauter; Power Capacitors by J.B. Brittain; Environmental Relationships of PCB Coumpounds by B. A. Kerns; Manufacturing by R. B Sawyer; Voluntary and Regulatory Control by R. E. Wills, Jr. on 4/13/76                                                                                                            |
| 1387    | 906157-<br>906159 | Notes on employee meeting with Dr. Blair Smith, NIOSH, on 2/24, prepared by R. M. Anderson, dated 2/28/81                                                                                                                                                                                                                                                                                                                                                                |
| 1388    | 901031-<br>901035 | Presentation to Utility Service Board, by D. M. Sauter, dated 6/30/76                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1389    | 901001-<br>901004 | Memo from R. D. McClain, Bloomington Works to S. Sauter, J. Brittain, W. Wheeler, G. Miller, R. Kennon, A. Sweetana, dated 6/8/70                                                                                                                                                                                                                                                                                                                                        |
| 1390    | 901017-<br>901018 | Memo from R.D. McClain to Sauter, J. Brittain, J. Shoaff, dated 4/4/74                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1391    | 901007-<br>901016 | Memo from R. D. McClain, Bloomington Works, re Inerteen - Possible Environmental Contamination to D. Sauter, J. Brittain, A. Fink, W. Wheeler, R. Thompson, S. Brusoski, R. Hogan, G. Miller, T. Dakin, L. Mandelsorn, R. Kennon, A. Sweetana, L. Shoaff, K. Kelly, K. Tison, J. Rissinger, including Ineteen and Environmental Contamination by T. K. Sloat, dated 6/22/70; and letter by D. Olson dated 2/18/70; and memo from J. Goodwin dated 6/25/70; dated 7/23/70 |
| 1392    | 901021-           | Note from (illegible) to D.M. Sauter, F.A Bean, J.B. Brittain, D. M. Williams, dated 11/12/75                                                                                                                                                                                                                                                                                                                                                                            |
| 1393    | 901022-<br>901022 | Memo from P.G. Benignus to John Mason, H.S. Bergen, T.L. Gossage, C. Paton, R. H. Munch, S. Tucker, R. Keller, W. B. Papageorge, dated 12/3/71                                                                                                                                                                                                                                                                                                                           |
| 1394    | 901019-<br>901020 | Memo from C. R. Willmore, sec, ANSI re Use and Disposal of Askarel and Askarel Soaked Materials in Electrical Equipment, dated 12/23/75                                                                                                                                                                                                                                                                                                                                  |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                      |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1395    | 901036-<br>901040 | Statement by Westinghouse Management Official D. M. Sauter at EPA Meeting on PCBs, dated 1/14/76                                                                                                                                                                                 |
| 1396    | 901041-<br>901046 | Memo from J.B. Brittain to R. Wills, F. Bean, R. Sawyer and D. Sauter, dated 1/26/76                                                                                                                                                                                             |
| 1397    | 901028-<br>901029 | Memo to R. M. Anderson, J. O. Campbell, E. V. Clarke, Jr., D. P. Keiser, B. A. Kerns, V. J. Rinaldi, E. W. Seay, R. E. Wills, J. B. Wright, D. M. Sauter, from (illegible), dated 9/13/76                                                                                        |
| 1398    | 906160            | Westinghouse News article by D. M. Sauter, Emotions Cannot Take Place of Scientific Evaluation, dated 6/5/76                                                                                                                                                                     |
| 1399    | 736468-<br>736473 | Purchase Orders to J. B. Howard, Zim Turner, W.H. Morton, G. T. Childs, M.S. Fortson, J.L. Beebe, dated 9/25/73, 9/28/73, 12/6/72                                                                                                                                                |
| 1400    | 200354-<br>200355 | Letter from P. G. Benignus (Monsanto) to Keith Kelly, dated 7/7/71                                                                                                                                                                                                               |
| 1401    | 200612-<br>200628 | Preliminary Report of Inerteen Environmental Survey at Bloomington Distribution Apparatus Plant by T. O. Munson to W. E. Shoupp, J.C. R. Kelly, Jr., B. A. Kerns, J. G. Terrill, E. Boquist, J. B. Brittain, R. D. McClain, J. L. Shoaff, R. Sawyer, undated                     |
| 1402    | 906237-<br>906256 | Memo to F. Batchelder, R. Wright, P. Vopelak, J. Druckemiller, R. Northup, F. Stokes, R. Coburn, F. Patterson, D. Hutchinson, C. Johnson, M. Frydman from M. Degelow, American Electric Power Service Corp., dated 8/24/78                                                       |
| 1403    | 906235-<br>906236 | Letter to H. W. Speicher, Westinghouse, from E. Wheeler, Monsanto, dated 7/25/56                                                                                                                                                                                                 |
| 1404    | 906232-<br>906234 | Minutes of Meeting With Monsanto on Inerteen, dated 12/16/71 at St. Louis; attendees: B. Richards, R. Munch, P. Benignus, B. Papageorge, S. Tucker, E. Wheeler, D. Sauter, D. McClain, T. Dakin, G. Gainer, L. Mandelkorn, E. Boquist, D. Keiser, T. Munson, J. Kelley, T. Sloat |
| 1405    | 906227-<br>906231 | Memo to J. Brittain, J. Shoaff, R. Sawyer, R. Luzar from R. McClain dated 4/10/72 re policy meeting 4/7/72                                                                                                                                                                       |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                              |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1406    | 906225-<br>906226 | Memo to J. Brittain from R. McClain, cc: D. Sauter, A. Fink, R. Hogan, R. Thompson, F. Bean, S. Brusoski, G. Miller, R. Kennon, K. Kelly, R. Sawyer, J. Pickett, dated 1/28/71                                                                                                                                                                           |
| 1407    | 906217-<br>906224 | Letter to A. Pozefsky, G.E., from R. McClain, dated 1/14/72, cc: Clark, Kuzela, Moore, Papageorge, Benignus, Hammer, Lengefeld, Sloat, Salazar                                                                                                                                                                                                           |
| 1408    | 906196-<br>906216 | Westinghouse Research Laboratories: A Status Report on Chlorinated Diphenyls, Regarding Environmental Pollution, by T. Dakin, L. Mandelcorn, dated 12/27/71                                                                                                                                                                                              |
| 1409    | 201075-<br>201077 | Memo to D. McClain from J. Westland, cc: G. Miller, dated 5/19/70                                                                                                                                                                                                                                                                                        |
| 1410    | 201118            | Memo to D. Sauter, J. Brittain, W. Wheeler, G. Miller, R. Kennon. A. Sweetana from R. McClain, dated 6/8/70                                                                                                                                                                                                                                              |
| 1411    | 756100            | What's New In Capacitors, dated 10/28/71, by Gene Miller                                                                                                                                                                                                                                                                                                 |
| 1412    | 906257            | Westinghouse, South Boston Transformer Plant, Sales Letter 724, dated August 1972: Inerteen - Here to Stay!                                                                                                                                                                                                                                              |
| 1413    | 906276            | Memo from Westinghouse re Dispositon of Scrap Inerteen and Inerteen Contaminated Materials dated 7/29/70, revised 9/1/71                                                                                                                                                                                                                                 |
| 1414    | 714021-<br>714256 | Final Report of the Subcommittee on the Health Effects of Polychlorinated Biphenyls by the Department of Health, Education and Welfare, dated July 1976                                                                                                                                                                                                  |
| 1415    | 741136-<br>741143 | Analysis of Biodegradation Data, conclusions 1016, 1242 & 1254 information by J.D. Hinchey and R. E. Keller, undated                                                                                                                                                                                                                                     |
| 1416    | 741235            | Memo from E. L. Raab to J.T. Batty, P.G. Benignus, L.L. Dengler, E.L. Dobbins, J. C. Dutton, R. W. Frahm, W. B. Gaither, D. F. Haywood, E. C. Hoffman, T. H. lee, C. J. Mcloun, T. L. Mayes, L. A. Morgan, R. C. Ostoff re Electric and Nuclear Subcouncil, National Industrial Pollution Control Council, prepared at request of Russell Train, undated |

| Exhibit | Bates No.         | Description                                                                                                                                                                                        |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1417    | 741246-<br>741247 | Polychlorinated Biphenyls, Polychlorinated Terphenyls re products Monsanto produced, undated                                                                                                       |
| 1418    | 741267-<br>741282 | Report called Organic Chemicals Division Research Department, Project Analysis of Function Fluids: justification: purpose is to expand use of inerteen and pyranol, undated                        |
| 1419    | 741285-<br>741286 | Letter from David Wood to Michael Modan of GE re toxicity information of Aroclor 1016, documents not enclosed, dated 11/7/75                                                                       |
| 1420    | 741287-<br>741296 | Presentation titled Monsanto Industrial Chemicals Company Welcomes Mr. M.J. McDonough of Westinghouse Corporation (file Westinghouse dielectric aroclors), dated 6/1/72                            |
| 1421    | 738029            | Memo from F. R. Johannsen to G. Roush re cause of death of 311 workers at Krummrich Plant, dated 8/27/76                                                                                           |
| 1422    | 738030-<br>738032 | Memo from James McKee to J. T. Nolan, cc: D. R. Bishop, E. H. Harbison, F. R. Johannsen, G. Roush, dated 8/27/76                                                                                   |
| 1423    | 713441            | Letter from W. R. Gaffey to Gerhard Raabe, cc: D. L. Coleman, G. Roush, dated 12/7/79                                                                                                              |
| 1424    | 708076-<br>708079 | Letter from Donovan Gordon to Dr. Morris Weinberger, dated 5/19/76                                                                                                                                 |
| 1425    | 726554            | Memo from David Wood to W.B. Papageorge, cc: Bergen, Paton, Gossage, Roush, Levinskas, Keller, Mieure, Richard, Munch, Withers re call from Dr. J.R. Allen, University of Wisconsin, dated 8/29/75 |
| 1426    | 738010-<br>738013 | Memo from F. R. Johannsen to George Roush, cc: G. J. Levinskas, G. Bratsch, dated 8/22/75                                                                                                          |
| 1427    | 740440-<br>740453 | Memo from E. S. Tucker to C. Paton and J. T. Garrett, cc: Farrar, Keller, Richard, Wheeler, Confidential, dated 12/3/69                                                                            |
| 1428    | 729828            | Memo from J. P. Mieure to W. B. Papageorge, R.E. Keller, J. C. Weber, D. Wood, dated 10/29/75                                                                                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                 |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1429    | 714654-<br>714656 | Remarks from Weber re meeting with Russell Train, Administrator of EP, dated 5/13/76                                                                                                        |
| 1430    | 906258-<br>906259 | Author is Monsanto. Special Undertaking by Purchasers of Polychlorinated Biphenyls; indemnification contract, blank, undated                                                                |
| 1431    | 710683-<br>710684 | Letter from Howard Bergen re hold-harmless agreement with Monsanto                                                                                                                          |
| 1432    | 740838-<br>740846 | Memo from W. R. Richard to E. Wheeler, cc: Farrar, Bergen, dated 9/9/69                                                                                                                     |
| 1433    | 740804            | Monsanto statement The Polychlorinated Biphenyls Biodegradation Studies, undated                                                                                                            |
| 1434    | 740684-<br>740687 | Memo from W. B. Papageorge to Marsh (Brussels), Clark, Durland (Tokyo), Farrar, John, Keller, Kountz, Gossage, Park, Richard, Savage, Wheeler, cc: Bergen, Mason, Springgate, dated 10/6/70 |
| 1435    | 740635-<br>740671 | Report titled Semi-Continuous Activated Sludge Degradation Studies by Dr. Tucker re Aroclor 1221 and 1242 and 1254, undated                                                                 |
| 1436    | 740531-<br>740609 | Report titled Polychlorinated Biphenyl Biodegradation Studies with writing in margins, undated                                                                                              |
| 1437    | 740610-<br>740611 | Letter from Vodden in Ruabon to Munch in St. Louis, dated 1/25/72                                                                                                                           |
| 1438    | 740495-<br>740530 | Monsanto report entitled Biodegradability of Aroclor 1221, prepared by V. Saeger, E. Tucker, dated 8/74                                                                                     |
| 1439    | 740472-<br>740476 | Memo from W.R. Richard to R. . Munch and E.S. Tucker, cc: Keller, Kountz, dated 1/11/71                                                                                                     |
| 1440    | 740456-<br>740467 | Memo from E.S. Tucker, Monsanto, to R.E. Keller, cc Bryant, Farrar, Richard, Wheeler re Aroclor - Wildlife Monthly Summary - October & November, 1969, dated 11/20/69                       |
| 1441    | 740454-<br>740455 | Monthly Summary - November 1969, Functional Fluids Research; unauthored, undated                                                                                                            |
| 1442    | 740437-<br>740439 | Report and Comments on Meeting on Chlorinated Biphenyls in the Environment at Industrial Biotest Laboratories, Chicago, by R.L. Metcalf, dated 3/21/69                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                            |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1443    | 740427-<br>740433 | Analytical Program (4/70) for Polychlorinated Biphenyl Environmental Problem; undated, author unknown                                                                                                                  |
| 1444    | 740393-<br>740394 | Part of paper titled Chemical and Plastics - Europe, Monthly R & D Report, May 1970 (pgs. 12-13)                                                                                                                       |
| 1445    | 710796-<br>710799 | Letter to W.G. Ward, Canadian G.E., from H.F. Dixon, Monsanto Canada Ltd., re restrictive policies for PCBs, & attached agreement: Special Undertaking by Purchasers of PCBs                                           |
| 1446    | 200680-<br>200699 | Report by W.F. Von Oettingen, M.D., Director of Haskell Laboratory of Industrial Toxicology: The Toxicity and Potential Dangers of Inerteen, dated 3/28/38                                                             |
| 1447    | 736627-<br>736653 | Report and Summary re Comparison of Mean Serum PCB Levels for Probability and Preselected Group PCB Exposure Study, Paoli, PA; includes Final Report Technical Assistance to the Chester County, PA Health Dept. 11/87 |
| 1448    | 906262-<br>906263 | Safe Practice Data Sheet, re Inerteen, by Westinghouse, revised 12/1/70                                                                                                                                                |
| 1449    | 906260-<br>906261 | Memo to P. Benignus from W.R. Richard, cc: Olson, Bryant, R. Kountz, Kuhn, N.T. Johnson, dated 4/14/69                                                                                                                 |
| 1450    | 732855-<br>732857 | Letter to E. Kelly from G. Quinby, M.D., dated 3/22/71                                                                                                                                                                 |
| 1451    | 906277            | Memo to Harbison, Potter, Hamman, Sliney, Paton, Wood, Pohl, Papageorge, Roush, Bishop, Easley, Withers, Bottini from C. Weber, dated 11/17/75                                                                         |
| 1452    | 738369-<br>738380 | Memo to P. Marsh, W. Clark, J. Durland, E. John, R. Keller, R. Kountz, T. Gossage, P. Park, W. Richard, J. Savage, E. Wheeler, H. Bergen, C. Smith from W. Papageorge, dated 5/20/71                                   |
| 1453    | 738349-<br>738352 | Memo to J. Durland, cc: D. Danna, H. Bergen, J. Springgate from W. Papageorge, dated 3/6/70                                                                                                                            |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                             |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1454    | 729514-<br>729548 | Handwritten presentation to Monsanto CMC of the PCB Management Plan. Date is estimated at 4/20/70. Covers plant effluents, uses in cosmetics, pesticides, cutting oils, etc.                                                                            |
| 1455    | 732803-<br>732822 | Presentation of PCB Management Plan to Minckler, Mason, Bergen, Papageorge, dated 4/20/70. See slide/overhead templates at end of presentation. Update on PCB actions. Covers plant effluents, uses of PCBs, markets.                                   |
| 1456    | 738122-<br>738128 | Monsanto Organic Chemicals Division Research. Starts at pg.19, "Toxicity and Hazards"                                                                                                                                                                   |
| 1457    | 738175-<br>738176 | Monsanto production, "Dept. 246 & A-246 - Operating Instructions" Section IV, Department Rules. Pp. 10-11 of a handbook. Undated.                                                                                                                       |
| 1458    | 738177-<br>738184 | Standard Manufacturing Process Aroclors (Take-Over Distilled) Department 246. Undated, author unknown.                                                                                                                                                  |
| 1459    | 738198-<br>738205 | Standard Manufacturing Process for Aroclor, Depts 826.08, 826.17; Monsanto Co., Anniston plant, dated September, 1966. Copy 16. Prepared by M.J. Williams; names V. Haupt, R. Moody. Begins w/ Appendix J - Safety & Toxicity Data and Accident Reports |
| 1460    | 738206-<br>738215 | Standard Operating Instructions for Aroclors; Monsanto Co., Anniston plant, dated April, 1966. Covers Safety & Housekeeping for various hazardous chemicals produced by Monsanto.                                                                       |
| 1461    | 738216-<br>738217 | Monsanto Co. Tentative Amendment No. F to Standard Manufacturing Process for Aroclor, dated 9/20/66, amends 7/20/64. Names: Heisler, Carder, Gibbs, Hubbard.                                                                                            |
| 1462    | 738232-<br>738238 | Standard Manufacturing Process for Aroclor Blends; Monsanto Co., Anniston plant, dated 8/68. Begins w/ Appendix J, Safety & Toxicity Data & Accident Reports.                                                                                           |
| 1463    | 738239-<br>738245 | September 16, 1968, Report P-1504, Organic Chemicals Division Research Report: Tentative Process for Continuous Manufacture of Aroclor 1242 at Krummrich, by Hamlet, Gloeckner.                                                                         |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                              |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1464    | 738246-<br>738248 | Organic Chemical Division Research Report, dated 1/17/69, by J.D. Sullivan; title illegible.                                                                                                                                                                                                                                                                                                             |
| 1465    | 738252-<br>738254 | Memo to Kuhn, Carder, Molloy, Gibbs, Armstrong, Technical Information Center, Process Holders, dated 5/13/69                                                                                                                                                                                                                                                                                             |
| 1466    | 738255-<br>738264 | Standard Operating Instructions for Drumming and Flaking; Monsanto Co., Anniston Plant, dated 10/69. Begins w/ Section B, Safety and Housekeeping                                                                                                                                                                                                                                                        |
| 1467    | 738265-<br>738273 | Standard Operating Instructions for Aroclors; Monsanto Co., Anniston Plant, dated 11/69. Begins w/ Section B, Safety and Housekeeping                                                                                                                                                                                                                                                                    |
| 1468    | 738274-<br>738282 | Organic Chemicals Division Research Report: Tentative Process on Refining MCS 1109; dated 6/15/71, by D.R. Cova                                                                                                                                                                                                                                                                                          |
| 1469    | 738283-<br>738287 | Organic Chemicals Division Research Report: Tentative Process for the Preparation of Aroclor 1105, dated 6/18/71, by Q.E. Thompson                                                                                                                                                                                                                                                                       |
| 1470    | 738279-<br>738308 | Aroclor General, dated 1972. Memo to Leisy, cc: Kasten, Maddox, Mayer, McCutchan, Mueth, Paton, Savage, Sido, Sprague, Stewart, Surbaugh, Williams, Papageorge, from E. Potter, dated 6/27/72. Attached memo by C. Paton dated 6/5/72 on same subject. Attached memo by J.N. Haggart dated 5/29/72 on same subject. Attached memo by G. Sido dated 3/30/72 re PCB Tank Car Marking, & Bulk Load Labeling |
| 1471    | 738309-<br>738315 | Standard Manufacturing Process Aroclor 1016, Dept. 246; prepared by R. McCutchan, dated 9/72.                                                                                                                                                                                                                                                                                                            |
| 1472    | 738324-<br>738329 | Standard Manufacturing Process for Pyranols, Dept. 259, Inerteens, Dept. 259; prepared by G. Johnson, signed by Leisy, W.R. Richard, Savage; dated 9/74. (Missing many pages)                                                                                                                                                                                                                            |

| Exhibit    | Bates No.                | Description                                                                                                                                                                                                                                                                                                                                              |
|------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1473       | 906264-<br>906275        | Standard Manufacturing Process for Aroclors (Take-over distilled) Dept. 246; prepared by R.M. McCutchan, issued January 1972; approved by Leisy, W.R. Richard, R. Savage; supercedes report dated October 1966 & amendments A-L & report dated 9/16/68 & Report No. P-1504. Attached Hygienic Guide Series article acknowledges E. Wheeler & J. Garrett. |
| 1474       | 704171                   | Letter to D. McClain from P. Benignus dated April 1970; cc: N. Bergen, D. Olson, R. ???, W.R. Richard, Graham, J. Bryant                                                                                                                                                                                                                                 |
| 1475       | 732170                   | Memo from D.V.N. Hardy to Benignus, Buchanan, Cameron, Emmet Kelly, Graham, Steenrod, D. Wood, J.A. Evans, R.A. Baxter, dated 1/16/67                                                                                                                                                                                                                    |
| 1476       | 906182-<br>906187        | Report titled "Manufacturing" by R. B. Sawyer, Manager Manufacturing Planning Distribution Apparatus Division Westinghouse Electric Corp, Bloomington, IN re actions to prevent Aroclor from coming into contact with water, undated                                                                                                                     |
| 1477<br>of | 906492-<br>906493        | Letter to the editor of New England Journal Medicine, 8/19/76 (Aug. 19, 1976) re: <u>Melanoma After Exposure to PCBs</u> . From Bahn, Rosenwaike, Herrmann, Grover, Stellman, O'Leary. References. 2d Letter to NEJM (in reply to 1st), dated 1/13/77 (Jan. 13, 1977) re: <u>PCB? and Melanoma</u> by Lawrence.                                          |
| 1478       | 906494-<br><u>906497</u> | Study: <u>Induction of Liver Tumors in Sherman Strain Female Rats by Polychlorinated Biphenyl Aroclor 1260</u> . By Kimbrough, Squire, Linder, Strandberg, Montali and Burse. Journal of the National Cancer Institute, Vol. 55, No. 6, December 1975. 12/75.                                                                                            |
| 1479       | 906512-<br><u>906516</u> | Study: <u>Enhancement of Diethylnitrosamine Hepatocarcinogenesis in Rats by Exposure to Polychlorinated Biphenyls or Phenobarbital</u> by Nishizumi. Published in Cancer Letters, 2 (1976) 11-16.                                                                                                                                                        |
| 1480       | 906498-<br><u>906511</u> | Study: <u>Sources and Fate of Polychlorinated Dibenzodioxins, Dibenzofurans and Related Compounds in Human Environments</u> by Tiernan, Taylor, Garrett, VanNess, Solch, Wagel, Ferguson, and Schecter. Published in Environmental Health Perspectives, Vol. 59, pp. 145-158, 1985.                                                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                        |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1481    | 906623            | Handwritten notes on Westinghouse stationery, re discarding documents in nos. 5, 6 & 7, dated 3/3/88, Jeffrey J. Bair's telephone numbers at bottom of page                                        |
| 1482    | 906624            | Letter to S.R. Pitts, Environmental Affairs, from Jeffrey J. Bair, atty., dated 3/8/88                                                                                                             |
| 1483    | 906625-<br>906626 | Handwritten notes re decision-making committee, mentions Wayne, Ron, Sam, smoking gun type documents, disposing of files; undated, author unknown                                                  |
| 1484    | Reserved          | List of depositions cancelled by defendants entitled: Depositions Scheduled by Plaintiff, Cancelled or Dates Changed by Defendants; prepared 3/23/93                                               |
| 1485    | Reserved          | List prepared by plaintiff entitled: Document Authentication                                                                                                                                       |
| 1486    | 906627-<br>906645 | Excerpt from deposition transcript of Dr. Edward Walsh, taken 2/15/93, pgs. 48-64                                                                                                                  |
| 1487    | 906164-<br>906174 | Handwritten note by T.K.Sloat to Bud attached to "Policy for the use and Handling of Inerteen" dated 3/27/72                                                                                       |
| 1488    | 906560-<br>906580 | Letter from C. Paton to A.M. Salazar with attached minutes on Proposed PCB Effluent Standards meeting of 2/28/74 re EPA, dated 3/7/74                                                              |
| 1489    | 906581-<br>906584 | Guidelines for Transformer Material Manufacturing and Repair by T.K. Sloat & cc to Sawyer & unreadable stating Askarels believed to be non-toxic, but to avoid skin contact or swallowing, undated |
| 1490    | 906585-<br>906587 | Letter of indemnity, from Monsanto, signed by Herwald of Westinghouse and returned, Monsanto signature by E. J. Putzell, signed, dated 1/15/72                                                     |
| 1491    | 703049            | Letter from Dr. James Mieure to Dr. Robert A. Stenger re contamination, dated 10/24/75                                                                                                             |
| 1492    | 703133-<br>703134 | Letter from W. B. Papageorge to F. R. Viland re: conversation with Dr. Loughry (mentions Wilburn), dated 10/1/70                                                                                   |

| Exhibit | Bates No.         | Description                                                                                                                                               |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1493    | 703131            | Letter from W.B. Papageorge to Mr. Garlington Wilburn, cc Benignus, G.R. Graham, D.A. Olson, dated 6/5/70                                                 |
| 1494    | 713482-<br>713483 | Letter from Emmet Kelly, M.D. to Herbert Blumenthal, Ph.D, cc Dr. Joseph Calandra, Dr. Otis Fancher, W.B. Papageorge, G.W. Ingle, dated 4/8/70            |
| 1495    | 707693-<br>707694 | Letter from Elmer Wheeler to Dr. Joseph Calandra, dated 3/4/70                                                                                            |
| 1496    | 707887-<br>707889 | Letter from Elmer Wheeler to Fred Lee, cc Dr. Joseph Calandra, Dr. Donald Mount, W.B. Papageorge, Dr. Herbert Stokinger, dated 10/23/70                   |
| 1497    | 729429-<br>729430 | Letter from W.B. Papageorge to W.C. Reinhardt cc P.G. Benignus, H.S. Bergen, D.A. Olson                                                                   |
| 1498    | 729462            | Memo from R.A. Baxter to R. E. Keller, cc W. Richard, H.S. Bergen, W.B.Papageorge, D. Wood, R.A. Lidgett, J.N. Haggart, dated 8/19/75                     |
| 1499    | 716714-<br>716716 | Letter from Robert Emmett to William Papageorge, concerns, dated 6/5/75                                                                                   |
| 1500    | 906163            | Memo from D.M.Sauter to employees, dated 11/19/76                                                                                                         |
| 1501    | 741250-<br>741256 | Memo from W.B. Papageorge to Marsh, Clark, Durland, John, Keller, Kountz, Gossage, Park, Richard, Savage, wheeler, cc Bergen, Mason, Smith, dated 4/14/71 |
| 1502    | 738954            | Memo from W.V. Weekes to J.R. Savage cc Baxter, Bergen, Benignus, Hosmer, Kountz, MacDonald, Munch, Marsh, dated 4/13/71                                  |
| 1503    | 906150-<br>906153 | Memo from G.W. Wiener to S.W. Herwald, W.E.Shoupp, D. Berg, J.C.R.Kelly, E.V. Somers, G.C. Gainer, T.O. Munson, L. Mandelcorn, S. Jordan, dated 12/28/71. |
| 1504    | 732081-<br>732082 | Memo from E.S. Tucker to W.B. Papageorge cc Bergen, Keller, Munch, Richard, dated 11/20/73                                                                |

| Exhibit | Bates No.             | Description                                                                                                                                                                                                                                                                                                                 |
|---------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1505    | 716676-<br>716683     | Report from Paul Hodges "PCBs -Allowable Discharge from Producing/Using Plants" meeting minutes at EPA on 4/13/72, present: Easley, Papageorge, Leisy, Blowers, Engman, Tucker, Hodges; Buckley, Des Rosiers, Anderson, Everett, Miller, Pratt, Schirmer, dated 4/28/72                                                     |
| 1506    | 711848-<br>711857     | Letter with attachments from W. R. Corey to Paul DeFalco, Jr., cc Charles Commer, Bergen, Cunningham, Papageorge stating they do not divulge names of customers and they inform all customers of PCB dangers, dated 3/3/72. Press release of 11/30/71, "Monsanto releases PCB Production figures to Department of Commerce" |
| 1507    | 707815-<br>707816     | Letter from Elmer Wheeler to Dr. Otis Fancher, cc M.L. Keplinger, dated 4/28/72                                                                                                                                                                                                                                             |
| 1508    | 705075                | Letter from P.G. Benignus to Tom Dakin, cc Mason, Bergen, Gossage, Papageorge, Paton, Garcia, Richard, Munch, Tucker, Keller, dated 10/13/71                                                                                                                                                                                |
| 1509    | 774190-<br>774668     | Report re National Conference on Polychlorinated Biphenyls, 11/19-21/75 in Chicago, IL prepared for EPA, stamped William Stanley Library, General Electric Co, Pittsfield, MA, contains studies re J. C. Calandra, T.O. Munson, David Wood, Yusho, Kimbrough, dated 3/76                                                    |
| 1510    | 739409-<br><br>739416 | Report, Session V, Economics and Substitutes,<br><br>Warren Muir, Chairman for Environmental Health, Washington, DC with section "Chlorinated Byphenyl Dielectrics - Their Utility and Potential Substitutes" by David Wood, dated 11/20/75                                                                                 |
| 1511    | 713990-<br>714002     | Letter to James Mieure, Monsanto, from C.F. Jelinek, Dept. of Health, Education & Welfare, dated 12/23/74                                                                                                                                                                                                                   |
| 1512    | 906188-<br>906192     | Meeting With Westinghouse 9/4/75 9:30 a.m. A-303 Proposed Agenda, re Monsanto Trip, prepared by G.E. Mercier                                                                                                                                                                                                                |
| 1513    | 906646                | Memo to W.B. Papageorge, cc: R.E. Keller, R.H. Munch, W.R. Richard, from J.P. Mieure, dated 12/3/74                                                                                                                                                                                                                         |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1514    | 742183-<br>742184 | Memo to R.E. Keller, cc: M.W. Farrar, W.B. Papageorge, W.R. Richard, E.P. Wheeler from E.S. Tucker, J. Litschgi, B.J. Westenberger, dated 1/29/70                                                                                                                                                                                                                                                                |
| 1515    | 704172-<br>704173 | Letter to L. Shoaff, Westinghouse, from J.G. Bryant, cc: G.R. Graham, P.G. Benignus, dated 4/24/70                                                                                                                                                                                                                                                                                                               |
| 1516    | 739151-<br>739161 | Chemicals & Plastics - Europe, Monthly R & D Report. Handwritten at top: "WRR" and "Wire C. Coleman for details of 1 and 2." cc: handwritten top right are: Marks (?), Benignus, Bryant, Kuhn. 9/69                                                                                                                                                                                                              |
| 1517    | 739079-<br>739080 | THE PCB POLLUTION PROBLEM, SUMMARY OF JANUARY 21 AND 22, 1970. ST. LOUIS MEETING WITH GENERAL ELECTRIC COMPANY. Goes from Roman numeral I - XI. By P.G. Benignus.                                                                                                                                                                                                                                                |
| 1518    | 739081-<br>739090 | Minutes of THE PCB POLLUTION PROBLEM, January 21 and 22, 1970 (1/21 - 1/22/70) St. Louis Meeting with General Electric Company. GE Reps there: Raab; Gerade; Dr. K. Murphy, GE Environmental Pollution Control. Monsanto Reps: Bergen, Olson, Wheeler, Richard, Munch, Keller, Tucker, Papageorge, Bryant, Benignus.                                                                                             |
| 1519    | 771637<br>771639  | Letter from Kark of NEMA to Peyton of ANSI re: Proposed American National Standards Committee on Disposal of Askarel Used in Electrical Equipment. 1/26/71. File: 11.00. This is an addition to Kark's 11/19/70 letter which submitted a NEMA recommendation for establishment of a new ANSI committee. CC: Parris, Salazar, Benignus, Papageorge, McAdamas, Reinhardt. Two pages attached with list of members. |
| 1520    | 202109-<br>202130 | Paper on meeting, authored by Dakin, Mandelcorn. 12/27/71. Status Report on Chlorinated Diphenyls Regarding Environmental Pollution. Produced by Westinghouse Research Laboratories.                                                                                                                                                                                                                             |
| 1521    | 202956-<br>202957 | Letter from Benignus to Keith Kelly of WEC re: Askares - Inerteen - Aroclor Phosgene and Chlorine Gases. 11/13/68. Reply to request for information on above gases.                                                                                                                                                                                                                                              |
| 1522    | 202941-<br>202942 | Letter from Benignus to McClain of WEC. 2/18/71.                                                                                                                                                                                                                                                                                                                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                      |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1523    | 202226            | Letter from Benignus to K. Kelly re: Aroclor 1016, dated 7/30/71.                                                                                                                                                                                                                                                |
| 1524    | 202183-<br>202184 | Letter from Benignus to McClain of WEC, dated 2/18/71.                                                                                                                                                                                                                                                           |
| 1525    | 202172-<br>202176 | Minutes of Meeting by Sillett of Canadian WEC. Survey of PCB effects on wildlife; Monsanto pulling 1254 and 1260 from market; conclusions & recommendations for PCBs. WEC personnel in attendance: Sloat, Wilburn, Sillett. Monsanto personnel: Bergen, Olson, Richard, Savage, Benignus, Munch, Bryant. 4/17/70 |
| 1526    | 707819-<br>707820 | Summary of Toxicological Studies on Commercial PCB's; by J.C. Calandra, dated 11/10/75                                                                                                                                                                                                                           |
| 1527    | 707821-<br>707842 | Summary of Toxicological Studies on Commercial PCB's; by J.C. Calandra, dated 11/19/75                                                                                                                                                                                                                           |
| 1528    | 906278            | Memo to Curl, Swafford, Mitchell, Massy, Nichols, Crowe, Maguire, Dyer, Mallick, Hogan, R. Sawyer, D. McClain, K. Kelly, Shoaff, Conaway, Cox, dated 12/17/71, author unknown, from Bloomington, re Inerteen Control - Alert                                                                                     |
| 1529    | 906279-<br>906281 | Memo to Sauter, Fink, Hogan, R. Sawyer, Britain, Wheeler, Thompson, Shoaff, McClain, Tison, K. Kelly, Curl, Nichols, Ripplinger from J.H. Pickett, Manufacutring Engineer, Westinghouse, dated 11/17/70                                                                                                          |
| 1530    | 906282-<br>906284 | Memo to Luzar, Shoaff, Pickett, Taylor, cc: Sauter, Hogan, Fink, K. Kelly, Brittain, Thompson, Brusoski, Sweetana from R. Sawyer & R.D. McClain, Westinghouse, dated 6/20/72                                                                                                                                     |
| 1531    | 906285-<br>906286 | Memo to R.D. McClain, cc: Kirk, Kerns, Boquist, Maxin from H.W. Speicher, dated 10/6/72                                                                                                                                                                                                                          |
| 1532    | 715344            | Letter to C.T. Grigalauski, U.S. EPA, from J. Craddock, Monsanto, dated 2/9/81                                                                                                                                                                                                                                   |
| 1533    | 715346            | Letter to G. Howell, U.S. EPA, from J. Craddock, Monsanto, dated 4/3/81                                                                                                                                                                                                                                          |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                  |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1534    | 704145-<br>704146 | Letter to H. Mankedick, Westinghouse, from P. Gann, Project Coordinator (Monsanto?), cc: Papageorge, Paton, Benignus, dated 7/12/72                                                                                          |
| 1535    | 704138            | Letter to C.R. Jordan, Westinghouse, from P. Gann, Project Coordinator, cc: Paton, Benignus, dated 6/23/72                                                                                                                   |
| 1536    | 726683-<br>726712 | Memo to W.R. Richard, cc: R.E. Kelly, Tucker, Keller, Payton, Bergen, W.K. Johnson from E. Wheeler, dated 10/21/68                                                                                                           |
| 1537    | 738948-<br>738953 | Memo to W.B. Papageorge, cc: Baxter, Bergen, Cameron, Keller, Lidgett, Mainprize, Mason, W.R. Richard, Springgate, from H.A. Vodden, dated 8/17/70                                                                           |
| 1538    | 738904-<br>738944 | Paper entitled Results; undated, author unknown                                                                                                                                                                              |
| 1539    | 738811-<br>738842 | Monsanto Industrial Chemicals Company Visit at McGraw Edison Company to Review Status of Capacitor Aroclor (PCB) Dielectric Fluid, dated August 1972; author unknown                                                         |
| 1540    | 738747-<br>738786 | CRC Critical Reviews in Environmental Control, 9/75: PCB's and Their Environmental Effects, by D.B. Peakall, ref. R.W. Risebrough                                                                                            |
| 1541    | 738743-<br>738746 | Report on the Introduction of MCS 1016 in Europe, by P.J.A. Marsh, Brussels, dated 6/14/71; cc: Baxter, Benkgnus, Bergen, Coleman, Dahlstrom, Fallon, Gossage, Kountz, W.R. Richard, Savage, Vodden, Weekes, Haggart, Arpino |
| 1542    | 738728-<br>738731 | Memo to Papageorge from J.R. Durland, cc: Benignus, Bergen, Danna, Gossage, Katayama, Keller, Tucker, Munch, W.R. Richard, Uneno, Wheeler, dated 7/8/71                                                                      |
| 1543    | 738719-<br>738720 | Memo to Papageorge from W.R. Richard, cc: Munch, Mueller, Thompson, Weiss, Stark, Benignus, dated 3/27/70                                                                                                                    |
| 1544    | 739323-<br>739331 | Confidential paper re MCS 1016 - An Environmentally Compatible Aroclor, prepared by E.S. Tucker, Monsanto Co., dated 2/71                                                                                                    |

| Exhibit   | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                            |
|-----------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1545      | 739321-<br>739322 | Capacitor Fluids - MCS 1043 (A mono, di, trichlorobiphenyl blend); undated, author unknown                                                                                                                                                                                                                                                             |
| 1546      | 739287<br>739318  | Assessment of the Persistence of PCBs in Biological Systems; Primary Bacterial Degradation Studies, Residue Accumulation Studies; Aroclor Semi-Continuous Activated Sludge Primary Degradation Studies; Aroclor Residue Studies; Two Year Chronic Oral Exposure Residue Study of Aroclor 1242, 1254 & 1260 in Beagle Dogs; all undated, author unknown |
| 1547      | 739112-<br>739121 | Memo to Marsh, Clark, Durland, Farrar, John, Keller, Kountz, Gossage, Park, W.R. Richard, Savage, Wheeler, from Papageorge, dated 11/10/70, cc: Bergen, Mason, Springgate                                                                                                                                                                              |
| 1548      | 739103-<br>739105 | Organic Chemicals Division Research and Development Depts.: Project Analysis - Functional Fluids, sponsor Q.E. Thompson, dated 1/70                                                                                                                                                                                                                    |
| 1549      | 739076<br>739078  | Environmental Studies - Europe, dated 8/70, author unknown.                                                                                                                                                                                                                                                                                            |
| 1550<br>- | 741577-<br>741654 | Agriculture's Responsibility Concerning PCB's Report of USDA Ad Hoc Group on PCB's, March 1972, author unknown; letter to (illegible) from W. Clark, dated 12/15/70                                                                                                                                                                                    |
| 1551      | 742817-<br>742847 | PCB Changes in Dielectrics, by C. Paton, undated                                                                                                                                                                                                                                                                                                       |
| 1552      | 738519-<br>738538 | Minutes of Meeting on Proposed PCB Effluent Standards, dated 2/28/74, chaired by Papageorge, attendees: Clark, Doty, Moore, Carlson, J.S. Nelson, Richel, Simons, Rollins, Salazar, Sheppard, N. Smith, Benignus, Bergen, Hosmer, Munch, Withers, Paton, W.R. Richard, Savage, Tucker, P. Wright                                                       |
| 1553      | 742809-<br>742816 | Monsanto PCB Actions in Canada, by D. Goodwillie, undated                                                                                                                                                                                                                                                                                              |
| 1554      | 742770-<br>742781 | Typical Percentage Composition of PCBs; undated, author unknown                                                                                                                                                                                                                                                                                        |
| 1555      | 742782-<br>742800 | Aroclor Residue Studies; undated, author unknown                                                                                                                                                                                                                                                                                                       |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                     |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1556    | 738491-<br>738518 | Draft of letter to Hearing Clerk, EPA, undated, author unknown (indicates Monsanto), dated 12/27/73                                                                                                                                                             |
| 1557    | 739848-<br>739864 | Handwritten outline re Main Sources of Pollution; undated, author unknown                                                                                                                                                                                       |
| 1558    | 740324-<br>740327 | Handwritten notes re Semi-Continuous Activated Sludge (SAS) Biodegradation Studies; undated, author unknown                                                                                                                                                     |
| 1559    | 740388-<br>740392 | Aroclor Half Life in Bacterial Degradation Processes; undated, author unknown                                                                                                                                                                                   |
| 1560    | 740297-<br>740299 | Minutes of Meeting 12/1/72 at Monsanto Research Center, re MICC-MCL Information Exchange, prepared by E. Tucker, attendees: Dietrich, Emery, Papageorge, Lidgett, Munch, Mieure, Mees, Keller, Seager, Tucker, W.R. Richard, Wheeler                            |
| 1561    | 740292-<br>740296 | Memo to Papageorge from E. Tucker, dated 5/2/73, cc: Bergen, Corey, Hicks, Keller, Litschgi, Mees, Munch, W.R. Richard, Saeger, Stapleton, Wheeler                                                                                                              |
| 1562    | 740290-<br>740291 | Monsanto Chemicals Ltd. Research and Development Dept. Ruabon, (minutes of) Meeting with National Swedish Environment Protection Board at Solna, Sweden, 5/25/71, prepared by H. Vodden; names: Barrett, Baxter, Lidgett, Marsh, Papageorge, W.R. Richard, Palm |
| 1563    | 740286-<br>740289 | Bulletin of Environmental Contamination & Toxicology, Vol. 6, No. 2, 1971: Polychlorinated Biphenyl (Aroclor 1242): Effects of Uptake on Growth, Nucleic Acids, and Chlorophyll of a Marine Diatom, by J. Keil, L. Priester, S. Sandifer                        |
| 1564    | 740283-<br>740285 | Monsanto Chemicals Ltd. Research and Development Dept. Ruabon, Job Initiation re PCBs - Environmental Studies, dated 1/71, by H. Vodden                                                                                                                         |
| 1565    | 740201            | Memo to J. Mason from W.R. Richard, dated 9/7/71, cc: Bergen, Gossage, Keller, Papageorge, Paton, Tucker, Wheeler                                                                                                                                               |
| 1566    | 740202-<br>740204 | Memo to Papageorge from S. Uneno, Tokyo, dated 5/18/71, cc: Danna, Durland                                                                                                                                                                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                   |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1567    | 740175-<br>740176 | Memo to R. Bucknell from E. Tucker, dated 8/31/72, cc: Farrar, Graham, Keller                                                                                                                                                                                                                 |
| 1568    | 740127-<br>740141 | The Need for Continued Use of PCBs as Electrical Insulating Liquids, by E. Boquist, dated 1/3/72                                                                                                                                                                                              |
| 1569    | 739883-<br>739888 | Handwritten notes re chart of summary of major uses of Aroclors which have shown resistance to degradation, solid Aroclors not included                                                                                                                                                       |
| 1570    | 739874-<br>739882 | (Draft of) Presentation of the PCB Management Plan; undated, author unknown                                                                                                                                                                                                                   |
| 1571    | 742931-<br>742941 | Determination of Aroclors and Related Products in Mixed Liquor Samples from Semi-Continuous Activated Sludge Units by Ultraviolet Absorption; undated, author unknown                                                                                                                         |
| 1572    | 740064-<br>740066 | Memo to Baxter, Cameron, W.R. Richard from H. Vodden, dated 1/26/70, cc: Barrett, Dahlstroea, Garrels, Weckes, Papageorge                                                                                                                                                                     |
| 1573    | 739865-<br>739873 | Management Plan - PCB Environmental Problem; undated, author unknown                                                                                                                                                                                                                          |
| 1574    | 742930            | Aroclor - Biodegradation - Ruabon Visit, by W.R. Richard, undated                                                                                                                                                                                                                             |
| 1575    | 742928-<br>742929 | Memo to File from W.R. Richard, dated 5/13/69, cc: Keller, Wheeler, Tucker, Bergen, Olson, Kuhn, Kountz, Davis, Benignus, Bryant, Thompson, Weiss, Stark, Springgate, Farrar, Waychoff, Paton, Baxter, re Aroclor - Analysis in Pesticide Residues, Visit to Prof. Widmark, Stockholm, 5/5/69 |
| 1576    | 739970-<br>739990 | The Degradation of PCBs by Micro-Organisms; by R. Baxter, dated 4/4/72; includes section: Specialty Products                                                                                                                                                                                  |
| 1577    | 739958-<br>739969 | Possible Customer questions on PCBs - Publicity; undated, author unknown (indicates Monsanto)                                                                                                                                                                                                 |

| Exhibit   | Bates No.         | Description                                                                                                                                                                                                                                                   |
|-----------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1578      | 742757-<br>742769 | Polychlorinated Biphenyls - A Presentation to the Ontario Hydro Electric Commission Canadian Interdepartmental Working Party on PCBs Canadian Capacitor and Transformer Manufacturers, by E. Tucker, Monsanto Canada Ltd., dated 11/72                        |
| 1579      | 742744-<br>742756 | Aroclor Environmental Program - Detailed Report on European Trip Covering Analytical Programs, by R. Keller, dated 5/25/70                                                                                                                                    |
| 1580      | 741368            | Memo to R. Baxter, Papageorge from H. Vodden, dated 2/29/72, cc: Bergen, Marsh, W.R. Richard, Weekes                                                                                                                                                          |
| 1581      | 741316-<br>741317 | Letter to Westinghouse Electric Corp. from (Bergen?) Monsanto, dated 5/19/72                                                                                                                                                                                  |
| 1582      | 738478-<br>738490 | Memo to Marsh, Clark, Durland, John, Keller, Kountz, Gossage, Park, W.R. Richard, Savage, Wheeler from Papageorge, dated 2/8/71                                                                                                                               |
| 1583      | 742163-<br>742179 | Status Report Polychlorinated Biphenyls, dated 11/12/71; author unknown                                                                                                                                                                                       |
| 1584      | 742723-<br>742724 | Memo to Papageorge, Farrar from C. Paton, dated 2/10/70, listing Aroclors sold as plasticizers & their importance                                                                                                                                             |
| 1585      | 741974-<br>741988 | Archives of Environmental Contamination and Toxicology, Vol. 3, No. 2, 1975: Laboratory Model Ecosystem Studies of the Degradation and Fate of Radiolabeled Tri-, Tetra-, and Pentachlorobiphenyl Compared With DDE, by R. Metcalf, J. Sanborn, P. Lu, D. Nye |
| 1586      | 738419            | Letter to V. Wendt, Whirlpool Corp., from P. Benignus, dated 2/11/72                                                                                                                                                                                          |
| 1587<br>- | 742711-<br>742713 | Organic Division, Law and Medical Departments Report on PCBs; undated, author unknown; names: C. Smith, Mason, T. Smith, Bergen, Springgate, E. Kelly, Wheeler, Harris, D. Miller, Robinson                                                                   |
| 1588      | 738395-<br>738410 | Statement/affidavit of W.B. Papageorge, unsigned, undated, re Proposed Toxic Pollutant Effluent Standards for Aldrin-Dieldrin, et al - FWPCA (307) - Docket No. 1, State of Missouri                                                                          |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                    |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1589    | 738978-<br>738992 | Analysis of Biodegradation Data, by J. Hinchey, R. Keller, dated 11/70; includes charts & handwritten notes                                                                                                                                                                                    |
| 1590    | 738330-<br>738337 | Memo to Cameron, Clark, Durland, Farraf, John, Keller, Kountz, Olson, Park, W.R. Richard, Savage, Wheeler from Papageorge, dated 8/18/70, cc: Bergen, Mason, Springgate                                                                                                                        |
| 1591    | 738955-<br>738974 | Memo to W.R. Richard from R. Baxter, dated 3/31/71, cc: Papageorge, Marsh, Vodden                                                                                                                                                                                                              |
| 1592    | 741660-<br>741666 | BioScience, Vol. 20, No. 17, 9/1/72: Polychlorinated Biphenyls - Another Long-Life Widespread Chemical in the Environment, by D. Peakall, J. Lincer                                                                                                                                            |
| 1593    | 738394            | Memo to W.R. Richard from W. Papageorge, dated 9/13/71, cc: Benignus, Bergen, Gossage, Keller, Munch, Paton                                                                                                                                                                                    |
| 1594    | 738977            | Write-Up for Applied Sciences March 1971 - Monthly Summary; Aroclor Environmental Program; Biodegradation Testing Program; by R. Keller, dated 3/24/71                                                                                                                                         |
| 1595    | 738975-<br>738976 | Memo to (illegible) from H. Vodden, dated 3/26/71, cc: Barrett, Marsh, W.R. Richard                                                                                                                                                                                                            |
| 1596    | 704163            | Letter to Speicher of Westinghouse from Paul W. Gann of Monsanto dated 10/25/72                                                                                                                                                                                                                |
| 1597    | 906517-<br>906532 | Study: "Polychlorobiphenyls (PCBs) and their Interference with Pesticide Residue Analysis." by Reynolds of Canada. Published in Bulletin of Environmental Contamination & Toxicology, Vol. 4, No. 3, 1969.                                                                                     |
| 1598    | 906533-<br>906542 | Study: Current Progress in the Determination of the Polychlorinated Biphenyls by Risebrough, Reiche and Olcott, Inst. of Marine Resources, Dept of Nutritional Sciences, Univ. of California, Berkeley. Published in Bulletin of Environmental Contamination & Toxicology, Vol. 4, No. 4 1969. |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                              |
|---------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1599    | 906543-<br>906553 | <u>Reviews in Biochemical Toxicology, 2,</u><br>editors, Hodgson, Bend, Philpot. Portion of<br>article: <u>Modes of Toxic Action</u> , EFFECTS ON<br>IMMUNOCOMPETENCE BY CHEMICALS OF<br>ENVIRONMENTAL CONCERN by Faith, Luster and<br>Vos. pp. 183 - 196.                                                               |
| 1600    | 906554-<br>906559 | <u>Study: Promoting Effects of Polychlorinated</u><br><u>Biphenyls (Aroclor 1254) and Polychlorinated</u><br><u>Dibenzofuran-Free Aroclor 1254 on</u><br><u>Diethylnitrosamine-Induced Tumorigenesis in</u><br><u>the Rat.</u> By Preston, Van Miller, Moore, and<br>Allen. Publ. in JNCI Vol. 66, No. 3, March<br>1981. |
| 1601    | 739465-<br>739497 | Table of Contents; Section II, Summary and<br>Conclusions; document untitled, undated,<br>739497 author unknown                                                                                                                                                                                                          |
| 1602    | 740328-<br>740387 | Steno notebook copied with all handwritten<br>notes; author unknown, dated 5/4/70 re<br>Newport Meeting; 5/5/70 re studies<br>(European?); 5/18, 5/19, 5/20/70                                                                                                                                                           |
| 1603    | 740214-<br>740282 | Semi-Continuous Activated Sludge Degradation<br>Studies, by E. Tucker, re speaking<br>presentation to accompany slide exhibits                                                                                                                                                                                           |
| 1604    | 740009-<br>740044 | Monsanto letterhead. Study, dated 9/13/71 by<br>Lidgett, Vodden, Gilbert. Review report of<br>Biodegradability of Aroclors 1242, 1016.<br>Security Class A, Reference # MP 10227                                                                                                                                         |
| 1605    | 740300-<br>740323 | (Rough Draft - Not Edited) Biodegradation<br>Studies - 1st Quarter, 1970; by E. Tucker, R.<br>Keller, Monsanto Co., dated 4/70                                                                                                                                                                                           |
| 1606    | 741318-<br>741367 | CPR Research - Industrial Pollution Client<br>Report, dated 6/8/71: Federal Pollution<br>Policy on PCBs; author unknown                                                                                                                                                                                                  |
| 1607    | 741398-<br>741576 | Environmental Health Perspectives;<br>Experimental Issue No. 1, April 1972.<br>(Entire magazine; includes articles on PCBs)                                                                                                                                                                                              |
| 1608    | 739005-<br>739024 | The Degradation of Polychlorinated Biphenyls<br>by Micro-Organisms, by Baxter, Bilbert,<br>Lidgett, Mainprize, Vodden. Monsanto Europe,<br>SA, Belgium. Submitted for Publication;<br>Subject to Review.                                                                                                                 |

| Exhibit | Bates No.                | Description                                                                                                                                                                                                                   |
|---------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1609    | 741369-<br>741397        | (Draft) State of Concerns of the Lake Michigan Toxic Substances Committee Related to Poly- chlorinated Biphenyls, by K. Bremer, EPA, dated July, 1975                                                                         |
| 1610    | 739917-<br>739957        | (Draft) Polychlorinated Biphenyls - Chemical and Physical Properties/Definition; author unknown, handwritten 3/3/75                                                                                                           |
| 1611    | 742709-<br>742710        | Memo to J. Durland, Tokyo, from H. Bergen, dated 12/16/69                                                                                                                                                                     |
| 1612    | 906287-<br>906288        | Letter to J.W. Fisch from C.W. Bickerstaff, Westinghouse, dated 1/29/88, cc: S.R. Pitts, J.J. Bair                                                                                                                            |
| 1613    | 906289-<br><u>906491</u> | Transcript of Hearing before Hon. P.R. Davis, <u>Dashko v. Fibreboard Corp.</u> , District Court of Travis County, Texas, on 2/8/93                                                                                           |
| 1614    | 202140-<br>202141        | Letter from Gossage to K. Kelly of WEC, dated 11/30/70.                                                                                                                                                                       |
| 1615    | 202951                   | Letter from Benignus to K. Kelly of WEC. Cover letter for specifications on Aroclor 1016 & 1242. UL rating stays the same. Cover for two articles re: PCB and the environment, articles NOT attached.                         |
| 1616    | 776495-<br>776496        | Report - Minutes of Meeting from GE trip to Monsanto (St. Louis). GE Attendees: Murphy, Raab, Gerard; Monsanto personnel: Benignus, Bergen, Bryant, Keller, Kelly, Mason, Munch, Olson, Papageorge, Richard, Tucker, Wheeler. |
| 1617    | 906649-<br>906651A       | The Proper Handling of Aroclors and Their Mixtures in the Electrical Industry, by P.G. Benignus, dated 12/1/54. Index indicates 9 chapters; only Chapter 9, Dermatology & Toxicology, is present.                             |
| 1618    | 906652-<br>906735        | Proper Handling of Aroclors and Their Mixtures in the Electrical Industry, by P.G. Benignus, dated 5/1/56.                                                                                                                    |
| 1619    | 906798                   | Plant Operating Data for Krummrich or Anniston plant. Month of August, 1947. Sums up year to date for 1947. Lists product, operating time, still hours, pounds, shipped and packed, etc.                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                          |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1620    | 906739            | Letter to Benignus from T.K. Sloat, dated 11/5/68. References Underwriters Laboratory report on Inerteen 54201-CM. Includes ordering information for Anaconda Gassing Cell.                          |
| 1621    | 906740            | Memo to D.A. Olson from P.G. Benignus, dated 12/5/69, cc: Munch, Bergen, Kuhn, Kountz, Richard, Bryant.                                                                                              |
| 1622    | 906741-<br>906742 | Memo to L.P. Hart, A. Pozefsky, D.J. Meyers, J.J. Lichiello, P.E. Fuerst, J.F. Repko, J.S. Nelson, from M.E. Scoville, re meeting with Benignus and Bergen held 12/17/69.                            |
| 1623    | 906743-<br>906744 | Letter to D.A. Olsen, Monsanto, from Raab, cc: Benignus, R.C. Wright, dated 7/1/70                                                                                                                   |
| 1624    | 906745-<br>906772 | Presentation by S.D. Myers, Inc. of Ohio to Congressman Seiberling, dated 3/28/81. Title: A Brief on US PCB Regulation - Effects on Human Health, the Disposal Dilemma; and Economic Impact.         |
| 1625    | 771921-<br>771938 | IEEE Guide for Acceptance and Maintenance of Transformer Askarel in Equipment, cover page dated 1970, Guide page dated 3/1/74. See pg. 12.                                                           |
| 1626    | 771651-<br>771656 | Minutes of meeting 2/23/71 re: Committee on Use and Disposal of Askarel; the Board of Directors; Power Equipment Division by Salazar. Cover memo to Bergen, cc: Papageorge, Gossage. dated 12/13/71. |
| 1627    | 906773            | Table 8, Monsanto Production and Sales of Aroclors for 1960-1971 with breakdown showing Electrical Usage, 12/6/71.                                                                                   |
| 1628    | 776711-<br>776731 | PCB Chronology by Product Quality Staff of General Electric. This information may only be released with the approval of the Electronic Components Division. Dated 10/13/75.                          |
| 1629    | 906774-<br>906778 | Letter to (not stated) from P. Benignus dated 2/18/71.                                                                                                                                               |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                        |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1630    | 906779-<br>906797 | Pages consist of cover memo from Burnham, Chair of National Industrial Pollution Control Council (NIPCC) to Cross for report on industry's efforts to evaluated pollution problem caused by discarding old appliances.             |
| 1631    | 771758-<br>771810 | NEMA Official Standards Proposal (for Handling and Disposal of Capacitor- and Transformer-Grade Askarels Containing Polychlorinated Biphenyls), dated 1/25/73.                                                                     |
| 1632    | 704176            | Letter to Mandelcorn from Bryant, dated 2/16/71.                                                                                                                                                                                   |
| 1633    | 704175            | Letter to K. Carlson from Bryant, dated 3/3/70, re best to clean floor with strong laundry detergent and water. On vinyl tile, only solution is to replace floor.                                                                  |
| 1634    | 900327-<br>900331 | Memo from Bryant to Benignus, Olson, Johnson, Garcia, Sullivan, Bradford, Graham, Davidson, Damiani, Hamil, Meyer, Vogler, Clay, Fague, Munch, Kountz, Kuhn, Richard, Koenig, Rositz, dated 4/11/69.                               |
| 1635    | 900072-<br>900073 | Sales report by Graham to Benignus, dated 11/11/70. WEC not happy with price increase. Rags used to clean up inerteen are being dry cleaned - could be great source of contamination.                                              |
| 1636    | 900069-<br>900071 | Sales report by Graham to Benignus, dated 11/12/70. Concern because salesmen are using scare tactics to sell dry-type transformers.                                                                                                |
| 1637    | 733727-<br>733729 | Memo to Bergen, Olson, Benignus, Bryant, Fallon, Roush, Shaw, Springate, Schalk, Waychoff, Keller, Tucker, Payton, Wells, Wildi, from W.R. Richard, dated 3/10/69, re Notes from meeting held 3/6/69 with IBT, Aroclor - Wildlife. |
| 1638    | 728451            | Letter to J. Nelson from E. Wheeler, cc: Bryant, Benignus, dated 7/21/69.                                                                                                                                                          |
| 1639    | 711834-<br>711836 | Letter to Benignus from H. Johnson, dated 12/6/71.                                                                                                                                                                                 |
| 1640    | 734689-<br>734709 | IEEE Guide for Acceptance and Maintenance of Transformer Askarel in Equipment, dated 3/1/74.                                                                                                                                       |

| Exhibit | Bates No.                                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1641    | 734423                                   | Letter to A. Salazar from P. Benignus, dated 10/29/71, cc: A. Pozefsky, E. Raab.                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1642    | 734834-<br>734835                        | Memo to Hart, Pozefsky, Meyers, Lichiello, Fuerst, Repko, Nelson, from M.E. Scoville, dated 12/22/69.                                                                                                                                                                                                                                                                                                                                                                                       |
| 1643    | 703052-<br>703053                        | Letter to L. Barker, G.E., from R.P. Sullivan, Monsanto, cc: Benignus, W.R. Richard, N.T. Johnson, Bryant, Graham, Tegethoff, dated 11/8/68.                                                                                                                                                                                                                                                                                                                                                |
| 1644    | 734667                                   | Memo to Members of IEEE Transformers Committee from E. Raab, dated 3/10/66.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1645    | 900053-<br>900055                        | Letter to H.W. Speicher from E.P. Wheeler, cc: Benignus, dated 10/23/59.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1646    | 710681-<br>710682                        | Form letter from T.L. Gossage, undated. References Benignus. Monsanto has discontinued sale of PCB askarel products to transformer repair shops.                                                                                                                                                                                                                                                                                                                                            |
| 1647    | 734680-<br>734682                        | Memo to All Members of Special Working Groups to Prepare Preliminary Recommendations for the Capacitor and Transformer Subcommittees, of the ANSI Committee, C107, on Use and Disposal of Askarel and Askarel-Soaked Materials, from A.M. Salazar, dated 11/18/71. Names: Raab, Crabtree, Grogan, Lengefeld, Reinhardt, Rickley, Sloat, Benignus, Papageorge, Pozefsky, Clark, Hammer, Kuzela, McClain, Moore, Rissinger, Poarch, Kark, Sherr, Pisciotta. Re: Agenda for 12/15/71 meetings. |
| 1648    | 769186-<br>769188 &<br>726145-<br>726148 | Article from AWN dated 12/27/71; top of page obscured by handwritten notes to McClain; entitled Scientists Worry Over PCBs at Landmark NIEHS Meeting; re PCB meeting at Quail Roost, NC; attached meeting agenda for 12/20&21/71, including speakers                                                                                                                                                                                                                                        |
| 1649    | 200446-<br>200447                        | Memo to R. Thompson from K. Kelly, cc: Tison, Sweetana, McClain, dated 2/19/71.                                                                                                                                                                                                                                                                                                                                                                                                             |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                           |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1650    | 200279-<br>200283 | Minutes of 2/23/71 meeting of Committee on Use and Disposal of Askarel; of the Board of Directors; of the Power Equipment Division, prepared by A.M. Salazar. Present: Allen, Kuzela, Raab, Reinhardt, Rissinger, Rowe, Benignus, Hauser, Papageorge, Rickley, Salazar (begins pg. 4) |
| 1651    | 900541-<br>900544 | Memo to J. Brittain, R. Thompson from D. McClain, cc: K. Tison, J. Howells, T.W. Dakin, re Meeting with Monsanto Chemical Co.                                                                                                                                                         |
| 1652    | 734901-<br>734902 | Letter to A.E. Peltosalo, G.E., from T.L. Gossage, cc: W.A. Schlotterbeck, E.L. Raab, J.P. Kinney, dated 2/8/72.                                                                                                                                                                      |
| 1653    | 900369-<br>900374 | Memo to Directors of Marketing, Field Sales Directors & Managers, District Sales Directors from C. Paton & W.S. Clark, dated 12/17/71                                                                                                                                                 |
| 1654    | 703129            | Letter to Mandelcorn from Papageorge, cc: Graham, dated 8/14/70                                                                                                                                                                                                                       |
| 1655    | 900064-<br>900066 | Memo to Benignus from (not stated), cc: Olson, Papageorge, mentions McClain, Mercer, Tyson, Graham, dated 4/29/70                                                                                                                                                                     |
| 1656    | 900074-<br>900075 | Memo to Benignus from (not stated), cc: Papageorge, mentions McClain, Tison, Scheof, Olson, Graham, dated 7/22/70                                                                                                                                                                     |
| 1657    | 702992            | Letter to Raab from Papageorge, cc: Benignus, dated 12/17/70                                                                                                                                                                                                                          |
| 1658    | 711828-<br>711829 | Letter to L. Lefke from Papageorge, cc: Salazar, Benignus, dated 11/5/71                                                                                                                                                                                                              |
| 1659    | 703136            | Letter to R. Himstreet from Papageorge, cc: Heilala, Benignus, dated 6/21/71                                                                                                                                                                                                          |
| 1660    | 734678-<br>734679 | Memo to Allen, Benignus, Hauser, Kuzela, Lower, Papageorge, Raab, Reinhardt, Rissinger, Rowe from Salazar, cc: Kark, Pisciotta, McAdams, dated 2/10/71                                                                                                                                |
| 1661    | 703174            | Letter to L. Kleinvehn, Westinghouse, from R. Keller, cc: W.R. Richard, Benignus, Papageorge, Tucker, dated 2/9/71                                                                                                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                         |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1662    | 703113-<br>703114 | Letter to F. Argersinger, G.E., from T. Gossage, cc: Benignus, Graham, Bergen, dated 11/30/70                                                                                                                                                       |
| 1663    | 703079<br>703080  | Letter to L. Crowe, G.E., from R. Graham, cc: Benignus, Gossage, Hall, Papageorge, Keen, dated 12/29/70                                                                                                                                             |
| 1664    | 729292-<br>729296 | (Confidential) Report on Meeting with Bayer, Caffaro & Prodelec in Brussels 5/14/70, author unknown, cc: Barrett, Bergen, Dahlstrom, Keller, MacDonald, Marsh, Newman, Onians, Papageorge, Springgate, Vodden, Wheeler                              |
| 1665    | 716684            | Memo to Benignus, Bergen, Corey, Gossage, Keller, Munch, Paton, W.R. Richard, Stapleton, Tucker, Easley from Papageorge, dated 5/2/72                                                                                                               |
| 1666    | 710876            | Letter to E. Raab from Benignus, dated 4/1/70                                                                                                                                                                                                       |
| 1667    | 710668-<br>710670 | Form letter to customers from J. Alley, Monsanto, undated, advising of incineration facilities; attached memo from Benignus, dated 8/6/70 re MCS 1016                                                                                               |
| 1668    | 704124            | Letter to G. Hvisdos, Westinghouse, from J. Bryant, cc: Heimach, Graham, Rains, McCutshein, Kaiser, Benignus, Sipes, dated 1/19/70                                                                                                                  |
| 1669    | 704122-<br>704123 | Letter to D. Deum, Westinghouse, from P. Slayton, cc: Bryant, dated 4/4/72                                                                                                                                                                          |
| 1670    | 704169            | Letter to J. Rissinger from P. Benignus, cc: Sloat, Wilburn, dated 7/7/70                                                                                                                                                                           |
| 1671    | 753027-<br>753029 | Memo to Aldworth, from Sheppard, cc: Brittain, Breitweiser, Mercier, Shoaff, McDonough, Wolfe, Kerns, Wills, Lawrence, McClain, Munson, Lovett, Wilburn, Sloat, Vargo, Conner, Brennan, Terrill, J. Wright, Baumbeck, Schwab, Sauter, dated 10/1/74 |
| 1672    | 734673            | Letter to E. Morrison from V. Mulhall, cc: Dind, Morgan, Raab, Benignus, Gillies, Keil, Lowe, Locke, Reinhardt, Schwab, Sloat, Kenoyer, dated 2/26/70                                                                                               |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                      |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1673    | 300512-<br>300514 | Letter from Landrigan (Landrigau) of Dept. of Health, Education & Welfare, date 3/9/78. Blood serum levels of PCBs in Bloomington, IN. Serum levels of workers exposed were significantly higher. Some systemic effects noted in workers.                                                                                                                                        |
| 1674    | 775766-<br>775767 | New England Journal of Medicine, letter to the editor, 8/19/76 re: <u>Melanoma After Exposure to PCBs</u> , from Gahn, Rosenwaike, Herrmann, Grover, Stellman, O'Leary. References. 2d Letter to editor of NEJM (in reply to 1st), dated 1/13/77 re: <u>PCB? and Melanoma</u> by Lawrence. See reply letter of Bahn, Grover, Rosenwaike, O'Leary and Stellman immediately below. |
| 1675    | 905411-<br>905435 | Bibliography from Exh. #1113, <u>Occupational Exposure to Polychlorinated Biphenyls (PCBs)</u> from Department of Health, Education and Welfare, National Institute for Occupational Safety and Health (NIOSH).                                                                                                                                                                  |
| 1676    | 907032-<br>907033 | Letter, dated 9/1/82 from J. Robertson, Esq. of Wilmer, Cutler & Pickering to F.C. Rehfeld, Esq. of Monsanto                                                                                                                                                                                                                                                                     |
| 1677    | 907034-<br>907037 | Letter, dated 3/4/81 from J. Robertson, Esq. to F.C. Rehfeld, Esq. of Monsanto                                                                                                                                                                                                                                                                                                   |
| 1678    | 907038-<br>907041 | Letter, dated 7/25/83 from J. Robertson, Esq. to F.C. Rehfeld, Esq. of Monsanto                                                                                                                                                                                                                                                                                                  |
| 1679    | 907042            | Letter, dated 3/2/84 from J. Robertson, Esq. to R. Berendt, Esq. of Monsanto                                                                                                                                                                                                                                                                                                     |
| 1680    | 907043            | Letter, dated 3/19/84 from Berendt of Monsanto (Asst. General Counsel - Litigation) to J. Robertson                                                                                                                                                                                                                                                                              |
| 1681    | 907044-<br>907045 | Letter, dated 8/10/81 from J. Robertson to F.C. Rehfeld, Esq. of Monsanto                                                                                                                                                                                                                                                                                                        |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 1682    | 907074-<br>907165 | <p>Affidavit of James Lawrence DeHass, signed and notarized 11/18/92. Attachments:</p> <ul style="list-style-type: none"> <li>a. Study: <u>Breast Cancer and the Environment, the Chlorine Connection</u>, a Greenpeace Report by J. Thornton, Introduction by S. Epstein, M.D.</li> <li>b. Statement of Richard K. Sluder, dated and notarized 8/11/92. Attachments to Sluder Affidavit: <ul style="list-style-type: none"> <li>A. Letter from E.C. Barnes of Industrial Hygiene, Westinghouse, to J.W. Wigert, Materials &amp; Process Manager, Westinghouse, dated 9/15/47.</li> <li>B. Letter from R.E. Kelly, Monsanto to Dr. J. Barrett (London), dated 9/20/55.</li> <li>C. Table: Chlorodibenzofurans in PCBs and their concentrations.</li> <li>D. Table: Chlorodibenzofurans in PCBs, compiled 10/3/79 and concentrations in ppm.</li> <li>E. Deposition of R.E. Kelly, Monsanto, Vol. II, taken in <u>Brown v. Monsanto</u>, dated 6/1/90.</li> <li>F. Westinghouse memo to Herwald, Shoupp, Berg, J.C.R. Kelly, Somers, Gainer, Munson, Mandelcorn, Jordan. Re: Minutes of PCB status conference by Wiener, Research Dir. - Power Systems. Dated 12/28/71.</li> <li>G. Westinghouse letter to Monsanto, this is the signed indemnity agreement. Herwald for WEC, Putzell for Monsanto. Dated 1/15/72.</li> <li>H. Letter from Calandra of IBT to Levinskis of Monsanto, dated 8/4/75.</li> <li>I. Study: <u>Pesticides and Polychlorinated Biphenyl Residues in Human Breast Lipids and Their Relation to Breast Cancer</u> by Falck, Ricci, Wolff, Godbold, Deckers.</li> <li>J. Letter from Blair Smith, M.D. to Sluder, dated 6/14/85.</li> <li>K. Letter from Blair Smith to Sluder, dated 11/8/85.</li> </ul> </li> <li>c. Supplement to Statement by Richard Sluder, dated 8/11/92.</li> </ul> |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                   |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1683    | 202657-<br>202660 | Westinghouse memo, marked "Proprietary Class I" with "destroy by burning or shredding" message. From G.W. Wiener to Herwald, Shoupp, Berg, J.C.R. Kelly, Somers, Gainer, Munson, Mandelcorn, Jordan. Dated 12/28/71.                                          |
| 1684    | 300857-<br>300860 | Handwritten notes from Westinghouse response to NPC motion for default. Written by J. Bair.                                                                                                                                                                   |
|         | 300899            | Handwritten notes by J. Bair, titled "Plan of Action." Numbered 1, 2, 3.                                                                                                                                                                                      |
|         | 300902            | Handwritten notes by J. Bair, appears to be a plan of how to proceed with document destruction. 1st full paragraph begins with "Ron will 'pave the way' for me by ..."                                                                                        |
|         | 300912            | Handwritten notes by J. Bair, lists a cabinet and its drawer contents - includes dioxin materials; shelf contents; and "Andy" at bottom of page.                                                                                                              |
|         | 300921            | Handwritten notes by J. Bair, lists the contents of "Black Cabinet" drawers. Includes dioxin materials.                                                                                                                                                       |
|         | 300928-<br>300929 | Handwritten notes by J. Bair, begins with "RL" "(1) What is Sam's definition of a 'Smoking Gun'?" 3rd paragraph begins with "There are literally thousands of smoking guns at IH.." ** Notes "Don't title binder 'Memos to Sam'...Leave everything untitled." |
|         | 300931            | Handwritten notes by J. Bair, titled " <u>Summary</u> " and begins with discussion of the Occupation Disease and Notification Bill.                                                                                                                           |
|         | 300934-<br>300936 | Handwritten notes by J. Bair, continues description of the Occupation Disease and Notification Bill and its potential effects on Westinghouse (what the records will be used for, how the bill will work).                                                    |
|         | 301034            | Handwritten notes by J. Bair, titled <u>Mark Peppiello's Office</u> , lists categories 1 - 5 of documents found there and what each category covers. 2d title, <u>Office files next to L.J. Fleming's (sp??) Office</u> .                                     |
|         | 301065            | Handwritten notes by J. Bair, titled <u>Meeting with Sam, Ron &amp; Wayne Bickerstaff</u> . 1st sentence reads 1948 - Barnes left IH & Wilbur Speicher took over." <u>Memo</u> is listed underneath with tabs and their subjects indicated.                   |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                      |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1685    | 301401-<br>301469 | Transcript from January 14, 1993 "MOTION TO DISSOLVE TEMPORARY RESTRAINTS" from <u>Cerka v. A.C. &amp; S., Inc.</u> , No. MID-13639-91, Superior Court of New Jersey Law Division - Civil Part Middlesex County. |
| 1686    | 300841-<br>300842 | Memo from J. Bair to W. Bickerstaff, dated 1/22/88                                                                                                                                                               |
| 1687    | 300845-<br>300846 | Memo to J.W. Fisch, Manager, Environmental Remediation, Industrial Hygiene & Safety from S.R. Pitts, dated 1/29/88. Handwritten notes at top right hand corner.                                                  |
| 1688    | 300847-<br>300852 | Memo to C.W. Bickerstaff from J. Bair, dated 2/9/88.                                                                                                                                                             |
| 1689    | 300853-<br>300856 | Letter from L. Mansour to J. Bair, dated 3/4/88.                                                                                                                                                                 |
| 1690    | 301819            | Calendar to show the dates relevant in 1988.                                                                                                                                                                     |
| 1691    | 300070-<br>300071 | Affidavit by J. Bair, prepared for <u>Cerka v. A. C. &amp; S., Inc.</u> , Superior Court of New Jersey, Law Division: Middlesex County. No. MID-13639-91. Asbestos Litigation. 1/10/93.                          |
| 1692    | 300072-<br>300074 | Affidavit of J. Bair for <u>In Re: Asbestos Litigation</u> , U.S.D.C. Eastern District of Pennsylvania, MDL No. 875. Dated 3/17/93.                                                                              |
| 1693    | 300075-<br>300076 | Affidavit of W. Bickerstaff in <u>Cerka v. A.C. &amp; S., Inc.</u> asbestos litigation. Superior Ct. of N.J. Law Division: Middlesex County, No. MID-13639-91. date 1/10/93.                                     |
| 1694    | 300077-<br>300078 | Affidavit of Bickerstaff in the <u>In re: Asbestos Litigation (No. VI)</u> , E.D. Pennsylvania, MDL 875. Dated 3/17/93.                                                                                          |
| 1695    | 300005-<br>300011 | Affidavit of Frances L. Garry In Support of Westinghouse Electric Corporation's Response to Nevada Power Company's Motion from Entry of Default. <u>Nevada Power v. Monsanto, et al.</u> , dated 3/19/93.        |
| 1696    | 704164            | Letter from Wheeler of Monsanto to Speicher of Westinghouse, dated 6/5/69.                                                                                                                                       |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1697    | 300145-<br>300155 | The five of nine documents Westinghouse claims to have produced for Nevada Power.<br>1) "Proprietary Class I" letter from Wiener to Herwald, Shoupp, Berg, JCR Kelly, Somers, Gainer, Munson, Mandelcorn, Jordan.<br>2) Letter to Speicher from ?? (first page only) of Monsanto. Dated 4/30/62.<br>3) Letter to Speicher, stamped "Confidential" from Wheeler of Monsanto, dated 10/23/59. Handwritten at top "From Monsanto Counsel."<br>4) Cover letter for PCB label, from Garrett, Manger Industrial Hygiene Medical Dept. to Speicher, Admin. Industrial Hygiene, dated 11/1/67. PCB label follows behind.<br>5) Letter from Wheeler of Monsanto to Speicher of Westinghouse, dated 3/4/69. Referenced attached findings of Aroclor in wildlife. Four enclosures total, none present. |
| 1698    | 300079,<br>300082 | Excerpts of deposition of Dr. E. Walsh, taken in this case. Date 3/15/93. Cover page and page 60.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1699    | 300863-<br>300866 | Memo from Bair to Paul Palmieri, Re: Review of Documents at Corporate Safety. Dated 3/8/88. Attachments are Corporate Safety Files List.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1700    | 300000-<br>300004 | Affidavit of Raymond J. Paschke in Support of Defendant Westinghouse Electric Corporation's Opposition to Plaintiff's Motion for Entry of Default Judgment. Dated 3/17/93. In <u>Nevada Power v. Monsanto, et al.</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1701    | 301099            | Handwritten notes of File locations, outside of L.J. Flemings office.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|         | 301105            | Handwritten notes of File locations, Office location of Mark Perriello in rear office                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|         | 301145            | Safe practice Data Sheets Table of Contents                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1702    | 301470-<br>301564 | Transcript of motion for Reconsideration regarding a Protective order (to be sealed) in <u>Cerka v. A.C. &amp; S.</u> , Asbestos Litigation, dated 2/4/93.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Exhibit    | Bates No.          | Description                                                                                                                                                                                                                                                          |
|------------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1703       | 301807-<br>301818  | <u>Serubo Cadillac Co., Inc. v. Cadillac Motor Car, Div. of General Motors Corp.</u> , 1986 WL 4524 (E.D. Pa). Opinion.                                                                                                                                              |
| 1704       | 300990             | Page of J. Bair's handwritten notes, dated 5/12/87. Titled "ARMA Legal Requirements for Records Management"                                                                                                                                                          |
| 1705       | 769259-<br>769284  | Report from 9 mo. investigation by Indiana Public Interest Research Group on Indiana State Board of Health & Monroe County Health Dept. Study began 2/76. Includes correspondence between WEC & Gov't agencies dated from 10/30/68 - 9/21/72.                        |
| 1706       | 740181-<br>740189  | Characterization of Polychlorinated Biphenyls, by M.P. Mieure, O. Hicks, R.G. Kaley, V.W. Saeger; undated                                                                                                                                                            |
| 1707       | 768698             | TRANSFORM: Westinghouse PCB Equipment Replacement and Reconditioning Service; notice/advertisement by WEC re replacing PCB equipment to come into compliance with EPA                                                                                                |
| 1708       | 771558-<br>771561  | Minutes produced by GE re: Meeting with Mt. Sinai Medical School. Dated 2/27/76. Attendees from GE were T. Casey and H. Pocock. Attendees from Mt. Sinai were Selikoff, Fishbein, Lilis, and Hammond.                                                                |
| 1709       | 771541 -<br>771546 | Letter from John Brown, Physical Chemistry Lab GE to Irving Selikoff, M.D. of Mount Sinai, dated 5/18/77.                                                                                                                                                            |
| 1710       | 767400-<br>767403  | Hygienic Guide Series: Chlorodiphenyls (Containing 42% and 54% Chlorine); author unknown; published Jan-Feb 1965; indicates known toxic effects in humans & animals                                                                                                  |
| 1711<br>in | 727349-<br>727351  | Identification of Chlorinated Dibenzofurans American Polychlorinated Biphenyls, Article in <u>Nature</u> 7/24/75, by Gerald Bowes, Michael Mulvihill (Canadian Wildlife Service), Bernd Simonett, A.L. Burlingame (Berkeley), and R. Risebrough (Bodega Marine Lab). |
| 1712       | 737755-<br>737756  | Letter from Steve Hamilton, GE to Dr. Paul DesRosiers, EPA dated 8/19/82. CC Donalley, Bcc S.P. Read.                                                                                                                                                                |

| Exhibit     | Bates No.              | Description                                                                                                                                                                                                                         |
|-------------|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1713        | 906977 -<br>907001     | Polychlorinated Biphenyls (PCB's): Potential Health Hazards from Electrical Equipment Fires or Failures, NIOSH Current Intelligence Bulletin 45, dated 2/24/86.                                                                     |
| 1714        | 906854 -<br><br>906975 | Characterization of PCB Transformer/Capacitor Fluids and Correlation with PCDDs and PCDFs in Soot, prepared for EPA by National Technical Information Service (NTIS), 1/87.                                                         |
| 1715        | 908937-<br>908969      | Polychlorinated Biphenyls in Electrical Transformers; Final Rule; Part IV, EPA. Federal Register, 7/17/85                                                                                                                           |
| 1716        | 907017-<br>907025      | Chemical and Biological Investigations of a Transformer Accident at Binghamton, NY; by O'Keefe, Silkworth, Gierthy, Smith, DeCaprio, Turner, Eadon, Hilker, Aldous, Kaminsky, Collins; from Environmental Health Perspectives, 1985 |
| 1717        | 558392-<br>558403      | NPC Memo to Fe Gascon from Ted Whisler, dated 7/17/92                                                                                                                                                                               |
| 1718        | 558408-<br>558391      | Receipt re returned material re transformers retired from system in 4/91 by Ted Whisler, dated 5/20/91                                                                                                                              |
| 1719<br>G.  | 746767-<br>746769      | Westinghouse letter from G. C. Wilburn to J. Aldworth, 4/23/70                                                                                                                                                                      |
| 1720<br>The | 757280-<br>757283      | Westinghouse letter from J. C. Aldworth to Honorable William Spong re Inerteen disposal in closed systems, Monsanto is sole supplier, dated 10/14/71                                                                                |
| 1721        | 745090-<br>745091      | Letter from E.C. Barnes, Industrial Hygiene Engineer to Floyd Staupp, Safety Engineer, dated 8/13/46.                                                                                                                               |
| 1722        | 777599                 | Letter from Mayes of Rome, Georgia plant, dated 4/9/74 to Moe of the Hickory, N. Carolina plant.                                                                                                                                    |
| 1723        | 201175-<br><br>201176  | Westinghouse letter from Lyon Mandelcorn to R. D. McClain, cc: H. Pierce, R. Hollister, T. W. Dakin, R. L. Miller, dated 5/28/71                                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                                                                  |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1724    | 909358-<br>909362 | Abstract of Albert Fritch, former Westinghouse Employee with poor health and poor health of children who was covered with Inerteen, never wore protective clothing or was warned, dated 2/22/88                                                                                                                                              |
| 1725    | 780782-<br>780785 | Letter from Donald Olson dated 2/28/70 with Open Letter to Electric Utility Customers attached                                                                                                                                                                                                                                               |
| 1726    | 780780-<br>780781 | Material Safety Data Sheet, GE, dated 5/80 re Aroclor 1254 approved by J.M. Nielsen                                                                                                                                                                                                                                                          |
| 1727    | 780786-<br>780793 | Letters (3) from Dr. Steven Hamilton to Edward Bates re medical exams of retirees dated 7/26/85; from Edward Bates to Dr. Steven Hamilton re Pittsfield GE Mortality Study, dated 10/16/85; and from David Wegman to Dr. Steven Hamilton referring to cancer studies and the other two letters, dated 12/21/87                               |
| 1728    | 749074-<br>749087 | Statement/affidavit of W.B. Papageorge, unsigned, undated, re Proposed Toxic Pollutant Effluent Standards for Aldrin-Dieldrin, et al - FWPCA (307) - Docket No. 1, State of Missouri                                                                                                                                                         |
| 1729    | 703127-<br>703128 | Letter from Wheeler of Monsanto to Bruce Smith of General Electric, 11/30/61.                                                                                                                                                                                                                                                                |
| 1730    | 749191-<br>749192 | Memo/report "Recommendations to the Board of Directors with Respect to the Environmental Problem Caused by Components of Askarels." To Reinhardt, Allen, Kuzela, Raab, Rissinger, Rowe. Undated. Discusses a meeting held 8/20/70 which reviewed the environmental problems caused by askarel pointed out by Lewis in a letter dated 7/7/70. |
| 1731    | 748330-<br>748331 | NEMA memo of Ad Hoc committee minutes from a meeting held 3/21/74. Memo dated 3/21/74.                                                                                                                                                                                                                                                       |
| 1732    | 748518-<br>748521 | Westinghouse Proprietary paper dated 2/3/72. "Status of Polychlorinated Biphenyls."                                                                                                                                                                                                                                                          |
| 1733    | 748966-<br>748969 | Westinghouse publication, dated 7/53. Instructions for Installation of Inerteen Transformers. Published by Sharon, PA division.                                                                                                                                                                                                              |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                       |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1734    | 748980-<br>748986 | Obsolete 9/47 Instruction Leaflet #3657-B, 3 and 7 G.P.M. Inerteen Conditioners. By Westinghouse.                                                                                                                                                                 |
| 1735    | 748987-<br>748993 | Westinghouse Instructions for 3 and 7 G.P.M. Inerteen Conditioners, effective 11/50.                                                                                                                                                                              |
| 1736    | 736460            | Memo from Mansfield Neal of General Electric (Division Counsel) to Power Delivery Division, dated 1/15/87.                                                                                                                                                        |
| 1737    | 736461            | Memo to All Large Transformer Employees from Mansfield Neal, dated 1/16/87.                                                                                                                                                                                       |
| 1738    | 736462            | Memo from Mansfield Neal (GE counsel) to Employees of large transformer operation, employees of bushing & arrester operations, dated 3/2/87.                                                                                                                      |
| 1739    | 736463-<br>736464 | Memo, dated 3/17/87 from Richard Biernacki to Burke, Sweatland, MacDonald, Meddaugh, Roberts, Walczyk, Heidel, Kopta, Comber.                                                                                                                                     |
| 1740    | 750207-<br>750208 | Letter to Power Transformer Engineering Managers, Distribution Transformer Eng. Managers, District Engineers. Undated. Re: Inerteen and Environmental Contamination, from T.K. Sloat, R.D. McClain, unsigned. Discusses an attached PCB notification by Monsanto. |
| 1741    | 750235            | Plant Fact Sheet on PCBs that are Common Knowledge in Our Plant. Westinghouse production. Undated, no author.                                                                                                                                                     |
| 1742    | 750585-<br>750586 | Inerteen Position Paper, Westinghouse Production. Undated, unsigned. Covers new price quotes for equipment, cites environmental costs.                                                                                                                            |
| 1743    | 750641-<br>750657 | EPA Background Statement by the Agency Administrator, Russell Train at PCB press conference 12/22/75. References 3 additional pages, but they are not attached.                                                                                                   |
| 1744    | 750874-<br>750881 | Westinghouse Product Specification sheets for Inerteen for capacitors. Range in years: 1950, 1953, 1954, 1956, 1958, 1959, 1959, 1961. As furnished by Monsanto Chemical Company.                                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                              |
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| 1745    | 750884-<br>750885 | Westinghouse 10/12/39 product specification sheet for inerteen. Handwritten note at bottom of sheet states "avoid breathing vapors and contact with skin."               |
| 1746    | 750887-<br>750889 | Product specification sheet from Westinghouse, dated 11/8/57. Specifies chlorinated hydrocarbon material. Aroclor 1248. Signed by Weingruber.                            |
| 1747    | 750890-<br>750892 | Product specification sheets from Westinghouse for Aroclor 1248. Dates are (1) 7/20/? (2) date is 5/20/63; (3) 2/20/66. See code at side of sheet. Warnings are present. |
| 1748    | 751397-<br>751398 | Memo on DAD Action to Assure Inerteen Supply; authored by K. Kelly & R.D. McClain; undated.                                                                              |
| 1749    | 751728-<br>751731 | Draft of an Engineering Bulletin on Guidelines for Warning Labels; author unknown; revised 4/6/72, 5/31/72 & 9/6/72.                                                     |
| 1750    | 752183-<br>752192 | CIGRE Study Committee No. 15 - "Askarels" - Minutes of Meeting Held at UNESCO Building, Paris, on 9/5/72; author unknown.                                                |
| 1751    | 752481-<br>752484 | Safe Practice Data Sheet I-1 - Inerteen (Capacitor M-54201CF thru CH and Transformer PDS 54201CM); prepared by Westinghouse; revised 4/30/71                             |
| 1752    | 752623-<br>752634 | III. Plant Housekeeping and Employee Safety, pgs. 3-14; document untitled; author & date unknown.                                                                        |
| 1753    | 752872-<br>752893 | Safety Plan; document untitled; author & date unknown.                                                                                                                   |
| 1754    | 753006            | Transformer Coolant Considerations; authored by D.P. Keiser & J.C. Gray, Westinghouse; dated 4/72.                                                                       |
| 1755    | 753081-<br>753082 | Letter to C.A. Tuttle, Aerovox Corp., from Papageorge, Monsanto, dated 5/30/75.                                                                                          |
| 1756    | 753156-<br>753157 | Insulating Fluids, Sec. 10-501: Report of Subcommittee on Disposal of Askarel and Askarel-Soaked Materials; by H.H. Blondet, undated.                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                                 |
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| 1757    | 753292-<br>753523 | PCBs in the United States Industrial Use and Environmental Distribution, Task I, 2/25/76, Final Report; prepared by the EPA.                                                |
| 1758    | 753613-<br>753622 | Policy for the Use and Handling of Inerteen; prepared by Westinghouse, dated 3/16/72 (unsigned).                                                                            |
| 1759    | 753799-<br>753800 | Draft news release: Westinghouse to Quit Using PCBs in Transformers; dated 7/15 (1976).                                                                                     |
| 1760    | 753810-<br>753850 | Polychlorinated Biphenyl (PCB) Compounds or Mixtures; prepared by Westinghouse, undated.                                                                                    |
| 1761    | 755423-<br>755430 | Westinghouse Inerteen Transformers Instruction Book; Sharon, PA; reprinted 3/38.                                                                                            |
| 1762    | 755431-<br>755449 | Westinghouse Inerteen Capacitors Instruction Book; East Pittsburgh, PA; 11/34.                                                                                              |
| 1763    | 755450-<br>755459 | Instructions for Inerteen Insulating Fluid P.D.S. 54201 CM and Installation and Maintenance of Inerteen Transformers; prepared by Westinghouse, Sharon, PA; effective 9/68. |
| 1764    | 755460-<br>755463 | Instructions - Installation of Inerteen Transformers; prepared by Westinghouse, 7/53.                                                                                       |
| 1765    | 755464-<br>755465 | Instructions - Operation and Maintenance of Inerteen Transformers; prepared by Westinghouse, 6/51.                                                                          |
| 1766    | 755466-<br>755469 | Westinghouse Transformer Apparatus: Type SL Inerteen Distribution and Power Trnasformers Instructions; dated 10/40.                                                         |
| 1767    | 755470-<br>755476 | Instruction Leaflet #3657-B, 3 and 7 G.P.M. Inerteen Conditioners; author unknown, dated 9/47.                                                                              |
| 1768    | 755477-<br>755483 | Instructions - 3 and 7 G.P.M. Inerteen Conditioners; prepared by Westinghouse, dated 11/50.                                                                                 |
| 1769    | 755484-<br>755497 | Instructions - Inerteen and Oil Insulated Feeder Switches; prepared by Westinghouse, dated 7/47.                                                                            |
| 1770    | 755498-<br>755505 | Inerteen Transformers - Inerteen; prepared by Westinghouse, revised 11/46.                                                                                                  |

| Exhibit | Bates No.         | Description                                                                                                                                                                     |
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| 1771    | 755506-<br>755520 | Instructions for Filling and Installing of Inerteen Transformers Shipped in Dry Nitrogen; author & date unknown.                                                                |
| 1772    | 755521-<br>755528 | Inerteen Transformers - Inerteen; author & date unknown.                                                                                                                        |
| 1773    | 755529-<br>755534 | Instructions - Inerteen and Oil Insulated Feeder Switches; prepared by Westinghouse, Sharon, PA, dated 11/61.                                                                   |
| 1774    | 755535-<br>755553 | Instruction Book PS-1001 for Power Substation Transformers; prepared by Westinghouse, South Boston, VA, undated.                                                                |
| 1775    | 755562-<br>755577 | Instructions - Indoor and Outdoor - Metal Enclosed Capacitor Equipment 230 to 13,800 Volts; prepared by Westinghouse, East Pittsburgh, PC, dated 1957.                          |
| 1776    | 755578-<br>755592 | Instruction Book NT 1001 for Part I Network Transformers; prepared by Westinghouse, South Boston, VA (handwritten dated 7/76).                                                  |
| 1777    | 755599-<br>755602 | Instructions - Installation of Inerteen Transformers; prepared by Westinghouse, dated 9/62.                                                                                     |
| 1778    | 755605-<br>755614 | Instructions - Liquid Filled Network Transformers; prepared by Westinghouse, Sharon, PA, dated 5/51.                                                                            |
| 1779    | 755631-<br>755646 | Instructions for Handling Inerteen Insulating Fluid P.D.S. 54201 CM and Installation and Maintenance of Inerteen Transformers; prepared by Westinghouse, Sharon, PA, dated 2/76 |
| 1780    | 755649-<br>755652 | Instructions - Installation of Inerteen Transformers; prepared by Westinghouse Sharon, PA, dated 5/51                                                                           |
| 1781    | 755670            | Memo to Dennison, Luzar, Stewart from Sawyer, dated 1/28/76 re Inerteen/TCB for PCA7 Type Coupling Capacitors                                                                   |
| 1782    | 755697            | Letter agreement to Westinghouse from Monsanto, dated 3/30/73, signed by Butler, Slayton                                                                                        |
| 1783    | 755719            | Letter to R.E. Neal from K. Kelly, dated 10/1/68.                                                                                                                               |

| Exhibit | Bates No.         | Description                                                                                                                                                            |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1784    | 755908-<br>755910 | Memo to Brittain, Shoaff, Sawyer, Luzar from McClain, dated 4/10/72.                                                                                                   |
| 1785    | 756527-<br>756549 | Report: Investigation of Polychlorinated Biphenyls in the Hudson River; prepared by Nadeau, Davis, undated.                                                            |
| 1786    | 756773-<br>756775 | Meeting ANSI C-107 Use and Disposal of Askarels and Askarel Soaked Materials, Chicago, 12/15/71.                                                                       |
| 1787    | 756776-<br>756777 | Memo to Allen, Benignus, Hauser, Kuzela, Lowe, Papageorge, Raab, Reinhardt, Rissinger, Rowe, from Salazar, dated 2/10/71.                                              |
| 1788    | 302320-<br>302321 | Order, dated 2/9/93 from <u>Dashko v. Fibreboard</u> , No. 91-14798, Travis County, Texas denying privilege to Westinghouse over "Smoking Gun" memo.                   |
| 1789    | 737976            | Memo to Bratsch from R.E. Kelly, re Examination of PCB Workers, dated 1/24/72                                                                                          |
| 1790    | 909932-<br>910385 | Final Report, PCBs in the United States: Industrial Use and Environmental Distribution, Task I, Contract No. 68-01-3259. Submitted to U.S. EPA 2/25/76 by Versar, Inc. |
| 1791    | RJG ???           |                                                                                                                                                                        |
| 1792    | 760459-<br>760460 | News release: Westinghouse Develops Non-PCB Fluid for Use in Capacitors; dated 11/8/??                                                                                 |
| 1793    | 909447-<br>909931 | U.S. Department of Commerce report, "PCBs in the United States, Industrial Use and Environmental Distribution," prepared for U.S. EPA, dated 2/25/76.                  |
| 1794    | 766423            | Spec sheet: Inerteen for Capacitors, PDS 9818-1, dated 5/20/59                                                                                                         |
| 1795    | 766425            | Spec sheet: Compound, Chlorinated, Material 54201CJ; dated 7/20/65                                                                                                     |
| 1796    | 766426            | Spec sheet: Compound, Chlorinated, Material No. 8187; dated 11/5/39                                                                                                    |
| 1797    | 766429            | Spec sheet: Inerteen, PDS 54201KA; dated 2/20/70                                                                                                                       |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                   |
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| 1798    | 200258-<br>200265 | Handwritten memo to Brittain, Sauter, Sweetana, Mercier, McClain, K. Kelly, (others illegible) from Shoaff, dated 2/3/76                                                                                                                                                      |
| 1799    | 777551-<br>777587 | Study: Task Force - Pyranol Transformers; author & date unknown                                                                                                                                                                                                               |
| 1800    | 770174<br>770177  | Memo to E.V. Clarke from Aldworth re Retrofitting of PCB-filled Transformers; dated 10/28/76                                                                                                                                                                                  |
| 1801    | 775595<br>775599  | Encyclopedia of Chemical Technology, Volume 5, Chlorine to Colors for Foods, Drugs, and Cosmetics, pgs. 294-297; by H.L. Hubbard, Monsanto, undated.                                                                                                                          |
| 1802    | 203817-<br>203818 | Memo to H.R. Sheppard from V.E. Gadrix, Westinghouse, re PCB nameplate, dated 11/14/75                                                                                                                                                                                        |
| 1803    | 203747-<br>203751 | Letter to Brittain from McClain, dated 6/22/72, re disposal of capacitors                                                                                                                                                                                                     |
| 1804    | 758582-<br>758596 | Guidelines for Handling and Disposal of Transformer-Grade Askarels, First Draft - for ANSI C-107 - 4/3/72; author unknown.                                                                                                                                                    |
| 1805    | 200668-<br>200670 | Memo to Shoaff from Munson re Inerteen Survey & visit with Dr. Armour, dated 10/4/71; similar memo to Vondracek from Munson with attached East Pittsburgh Environmental (Inerteen) Survey, memo dated 10/1/71. Both memos stamped Proprietary Class I, Strictly Limited, etc. |
| 1806    | 743344-<br>743346 | Press release: Westinghouse Offers Silicone-Filled Transformers for Indoor, Outdoor Applications; dated 4/29/??                                                                                                                                                               |
| 1807    | 203634            | Memo to Blackburn from Rissinger, re Inerteen - Possible Environmental Contamination, dated 5/18/70, re proposed nameplate information                                                                                                                                        |
| 1808    | 743259-<br>743261 | Process Spec No. 290219-B, Inerteen #7336, dated 7/26/33, changed 1/28/35, approved by Minor, Fawcett                                                                                                                                                                         |
| 1809    | 743262-<br>743264 | Process Spec No. 290480-B, Sampling and Transferring Inerteen 7336 From or To Shipping Containers, dated 11/17/37, changed 1/6/38                                                                                                                                             |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1810    | 742973            | Handwritten notes re capacitor labels used by Westinghouse since 1934; undated                                                                                                                                             |
| 1811    | 744414-<br>744422 | Inerteen Transformers - Inerteen; prepared by Westinghouse, revised 2/40                                                                                                                                                   |
| 1812    | 746811-<br>746817 | Askarels - Environmental Pollution; handwritten notes indicate this report was presented to CIGRE in 1970; prepared by Monsanto, date unknown                                                                              |
| 1813    | 746598-<br>746599 | Letter to Falk from Sauter re H.R. 10085 and H.R. 8576, dated 8/5/71                                                                                                                                                       |
| 1814    | 746753-<br>746760 | Letter to voting representatives of member companies on surge arrester section, from Condello, re Warning Labels, dated 10/11/72; attached Draft of an Engineering Bulletin on Guidelines for Warning Labels, dated 4/5/72 |
| 1815    | 758431-<br>758454 | Report/guide prepared by Monsanto, title page missing, re askarel dielectrics; includes section "Use Ordinary Personal Precautions"; undated                                                                               |
| 1816    | 758435-<br>758430 | Engineering Data Letter No. 1144-A - Inerteen; prepared by Westinghouse, dated 3/8/38                                                                                                                                      |
| 1817    | 758291-<br>758321 | Instructions for Inerteen Insulating Fluid P.D.S. 54201 CM; prepared by Westinghouse, Sharon, PA, dated 4/68                                                                                                               |
| 1818    | 758216-<br>758238 | Instructions for Inerteen Insulating Fluid P.D.S. 54201 KA; prepared by Westinghouse, Sharon, PA, dated 7/65                                                                                                               |
| 1819    | 758198-<br>758200 | Memo to Power Systems, Industry Products & Construction Field Sales, from Oliver, Sherman, Litten, dated 11/17/76                                                                                                          |
| 1820    | 757709-<br>757711 | Progress on PCB Control, by H. Onishi, Utilities Task Force, dated 5/13/76                                                                                                                                                 |
| 1821    | 757144            | Monsanto label: Inerteen 54201 KA; cautions against breathing vapors, contact with eyes & skin                                                                                                                             |
| 1822    | 757014-<br>757021 | Guidelines for Establishing a Respirator Control Program; author & date unknown                                                                                                                                            |

| Exhibit | Bates No.         | Description                                                                                                                                               |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1823    | 771418-<br>771419 | Memo to Hart from Hergen, General Electric, dated 8/30/76                                                                                                 |
| 1824    | 778318-<br>778319 | Memo to holders of Carcinogen Regulation Notebook attaching substitution page with list of possible carcinogens (includes chlorinated biphenyls)          |
| 1825    | 778354-<br>778394 | Letter to J.F. Young from J.F. Brown, General Electric, dated 10/30/75.                                                                                   |
| 1826    | 777363-<br>777364 | Letter to Nave from Bair, General Electric, re Pyranol Task Force Report, dated 1/4/74.                                                                   |
| 1827    | 774671-<br>774672 | Overall Appraisal Strategy Considerations and Recommendations of the Task Force; author & date unknown.                                                   |
| 1828    | 777944-<br>777946 | Minutes/notes of 1/5/76 Monsanto visit, prepared by Mathewson, dated 1/15/76                                                                              |
| 1829    | 773289-<br>773309 | General Electric Apparatus Dept. Technical Information Series; subject class: Liquid Insulation; prepared by E. Walker, signed by Kernaghan, dated 2/2/53 |
| 1830    | 773348-<br>773360 | General Electric Technical Information Series; subject class: Liquid Insulation; author unknown, signed by MacFadyen, dated 8/19/54                       |
| 1831    | 774951-<br>774952 | Letter to Hoselton from J.S. Nelson, General electric, re Retrofilling Pyranol Transformers, dated 11/17/76                                               |
| 1832    | 771745            | Abstract entitled Effect of a Chlorinated Additive (1476 Pyranol) on the Impulse and 60 Cycle Strength of 10-C Oil, dated 8/2/51                          |
| 1833    | 771667-<br>771673 | Pyranol Insulating-Liquid Purifier; prepared by General Electric, dated 7/14/69                                                                           |
| 1834    | 735631-<br>735632 | Pyrolysis and Combustion of Chlororsanics in Dielectric Fluids, by Eadon, NYS Dept. of Health, undated                                                    |
| 1835    | 777751-<br>777754 | Letter to Kuechler from McKee, Monsanto, dated 10/3/75                                                                                                    |
| 1836    | 777929-<br>77930  | Letter to Editor, McGraw-Hill, Inc., from (not stated), dated 12/21/76                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                                           |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1837    | 778437-<br>778440 | Letter to Masterpool from J.S. Nelson,<br>General Electric, dated 9/15/75                                                                                                                                                                                                                             |
| 1838    | 766420-<br>766422 | Spec sheet: Inerteen for Capacitors,<br>Material 9818; dated 7/5/50                                                                                                                                                                                                                                   |
| 1839    | 778286-<br>778288 | Memo to all representatives of member<br>companies in the transformer section, & all<br>members of the NEMA Transformer/EPA Working<br>Group, from Willmore, re PCBs in Oil, dated<br>2/15/77; attached memo to Division &<br>Department General Managers, from Ames,<br>Meloun, Maier, dated 4/10/70 |
| 1840    | 777911-<br>777913 | Letter to J.F. Brown from Selikoff, City<br>University of New York, dated 5/4/77                                                                                                                                                                                                                      |
| 1841    | 777096-<br>777100 | Information letter to all field sales<br>engineers from Frahm, SPQR, re Pyranol Update<br>II, dated 10/27/72                                                                                                                                                                                          |
| 1842    | 777194-<br>777197 | Information letter to all field sales<br>personnel from Frahm, re Pyranol III Update,<br>dated 4/24/75                                                                                                                                                                                                |
| 1843    | 737928-<br>737929 | Memo to Coppens from H.B. Williams re PCB<br>Policy or Labeling, dated 6/16/81                                                                                                                                                                                                                        |
| 1844    | 777365-<br>777375 | Trip Report: National Conference on PCBs,<br>Chicago, Illinois, 11/19-11/21/75, prepared<br>by J.F. Brown; undated                                                                                                                                                                                    |
| 1845    | 777424-<br>777424 | Summary of Available Literature Relating to<br>the Toxicity of Aroclor 1016 and Other PCB<br>Products, by J.F. Brown, dated 6/30/76                                                                                                                                                                   |
| 1846    | 777738-<br>777748 | Casey-Selikoff Letter, Middle Section, Draft<br>of 3/21/77, J.F. Brown                                                                                                                                                                                                                                |
| 1847    | 777518-<br>777520 | Power Delivery Hot Line: Pyranol = Askarel =<br>PCB, dated 1/19/77; author unknown                                                                                                                                                                                                                    |
| 1848    | 777730-<br>777731 | 3rd Draft - Bulletin EPS-4, Subpart 4.1 -<br>Guidelines for the Handling of Material<br>Containing PCBs; author & date unknown                                                                                                                                                                        |
| 1849    | 765029-<br>765029 | Letter to Speicher from Wheeler, dated<br>10/23/59                                                                                                                                                                                                                                                    |
| 1850    | 776532-<br>776537 | Letter to Flye from Farnsworth, General<br>Electric, dated 1/29/76                                                                                                                                                                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                             |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1851    | 776538-<br>776552 | Letter to EPA from Simons, General Electric, dated 1/15/76                                                                                                                                                              |
| 1852    | 776553-<br>776559 | Letter to Lewis from Scolnick, EPA, dated 12/22/75                                                                                                                                                                      |
| 1853    | 775078-<br>775080 | Recommendations of Union - PCBs; Medical Surveillance Program for PCBs; Work Practices; author & date unknown                                                                                                           |
| 1854    | 735624-<br>735629 | Pyrolysis and Combustion of Aroclor 1254 Contaminated Dielectric Fluids; Dioxin 85-5th International Symposium on Chlorinated Dioxins and Related Compounds; by G. Addis, Electric Power Research Institute, dated 1986 |
| 1855    | 773223-<br>773231 | (Handwritten) Pyranol - Formulation; author & date unknown                                                                                                                                                              |
| 1856    | 772960-<br>772961 | Memo to all members of the NEMA Transformer Industry/EPA Working Group, from Willmore, dated 12/3/76                                                                                                                    |
| 1857    | 773443-<br>773448 | Summary of the Toxicology of the Chlorinated Diphenyls, by H.W. Gerarde, dated 1/27/70                                                                                                                                  |
| 1858    | 773457-<br>773465 | Toxicological Effects; author & date unknown                                                                                                                                                                            |
| 1859    | 776500-<br>776504 | Trip Report: National Conference on PCBs; by W.A. Fessler, conference held 11/19-11/21/75                                                                                                                               |
| 1860    | 772945-<br>772957 | Here's How to Get More Performance and Save Money When Specifying Transformers; prepared by Monsanto, undated; produced by General Electric                                                                             |
| 1861    | 761108-<br>761109 | Material Safety Data Sheet for Inerteen Coolant; prepared by Speicher, dated 3/3/71                                                                                                                                     |
| 1862    | 761100-<br>761101 | Material Safety Data Sheet for Inerteen Coolant; preparer unknown, dated 4/11/75                                                                                                                                        |
| 1863    | 761054            | (Partial) memo (Confidential/Proprietary) to engineering department from Munson, Westinghouse, dated 9/25/72                                                                                                            |
| 1864    | 761035-<br>761037 | (Confidential/Proprietary) Memo to Shoaff from Munson, dated 10/4/71                                                                                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                           |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1865    | 760621-<br>760648 | Characteristics of Chlorinated Impregnants in D-C Paper Capacitors; by Berberich, Fields, Marbury; undated                                            |
| 1866    | 760732-<br>760740 | 1971 Electric Utility Engineering Conference, Subject No. 50, New Materials for Transformers; by Sheppard, dated 3/14-3/26/71                         |
| 1867    | 760660-<br>760679 | Investigation of Dimethyl Silicone as a Liquid Dielectric for Transformers; by H.A. Pearce, dated 6/6/73                                              |
| 1868    | 760595            | Memo to G.W. Minor from T.K. Sloat, re Inerteen 7336-9, dated 12/17/53                                                                                |
| 1869    | 760550            | Letter to (illegible) from Speicher, dated 12/6/61                                                                                                    |
| 1870    | 760466            | Memo to Bean, Breitweiser, Brittain, Mallick, Mercier, D.M. Williams, from Fink, re Damaged Capacitor Units in the Field, dated 5/6/75                |
| 1871    | 760251-<br>760252 | Letter to managers from T.K. Sloat re Inerteen and Environmental Contamination, dated 6/22/70                                                         |
| 1872    | 759660-<br>759685 | Carcinogenic Potential of the PCBs; by J.R. Allen, University of Wisconsin Medical School, undated                                                    |
| 1873    | 759609-<br>759616 | Liquid Dielectrics, Insulating Oils and Askarels; prepared by Westinghouse, dated 8/64                                                                |
| 1874    | 759587-<br>759608 | Economic Impact of Alternatives to PCBs; author & date unknown                                                                                        |
| 1875    | 759577-<br>759579 | Letter to Speicher from Wheeler, Monsanto, dated 2/23/73                                                                                              |
| 1876    | 759073-<br>759077 | Industrial Hygiene and Toxicology, Second Revised Edition; by F.A. Patty; Volume II - Toxicology, by Fassett, Irish; undated                          |
| 1877    | 761168-<br>761171 | (Confidential) Safe Practice Data Sheet - Inerteen (Capacitor 6935 and Transformer 7336); prepared by Westinghouse, East Pittsburgh, PA, dated 8/1/51 |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                  |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1878    | 761166-<br>761167 | (Confidential) Safe Practice Data Sheet - Inerteen (Capacitor M-54201CF thru CH and Transformer M-7336-9); prepared by Westinghouse, East Pittsburgh, PA, revised 12/1/62                                                                    |
| 1879    | 761205-<br>761208 | Safe Practice Data Sheet - Inerteen (Capacitor M-54201CF thru CH and Transformer PDS 54201CM); prepared by Westinghouse, East Pittsburgh, PA, revised 4/30/71                                                                                |
| 1880    | 761160-<br>761161 | (Confidential) Safe Practice Data Sheet - Waste Control and Disposal; author unknown, dated 11/9/72                                                                                                                                          |
| 1881    | 906016-<br>906027 | Industrial Hygiene Survey of the Polychlorinated Biphenyl Production Operation, Monsanto Industrial Chemicals Company in Sauget, Illinois. Survey date: 7/21-22/76 by Jones and Becker. Date of report: 5/6/77. Sponsored by NIOSH.          |
| 1882    | 741654            | Letter from Clark of Monsanto Specialty Plasticizer Marketing Dept. to Wrist of Mead Corp., dated 12/15/70.                                                                                                                                  |
| 1883    | 738952-<br>738953 | Monsanto Monthly European Report from Vodden in Ruabon, Wales to Baxter and Papageorge. Date: 4/23/71.                                                                                                                                       |
| 1884    | 775255-<br>775262 | Federal Register, Vol. 42, No. 63 - 4/1/77, pp. 17487 - 17494. Copy of proposed rules from Department of Health, Education & Welfare, Food and Drug Administration covering Polychlorinated Biphenyls (PCB's).                               |
| 1885    | 771367-<br>771368 | Proprietary Class I document, memo from Wiener, Research Dir., to Swiss, Dir., Chemical Research, dated 12/29/71.                                                                                                                            |
| 1886    | 773910-<br>773914 | "Background to the Regulation of Polychlorinated Biphenyls (PCB) in Canada." Date 4/1/76. To: Environmental Contaminants Committee of Environment Canada and Health & Welfare, Canada. Partial production of report, covering pages 85 - 88. |
| 1887    | 729237-<br>729238 | Letter from Papageorge to Risebrough, dated 11/4/71.                                                                                                                                                                                         |
| 1888    | 703154-<br>703155 | 4/30/62 Letter to Speicher from Wheeler                                                                                                                                                                                                      |

| Exhibit | Bates No.         | Description                                                                                                                                                                                                                                                                |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1889    | 729560-<br>729569 | Report from PCB Ad Hoc Committee; prepared by Westinghouse, dated 1/2/76                                                                                                                                                                                                   |
| 1890    | 703022-<br>703023 | Letter to McBournie from Wheeler, dated 10/10/69                                                                                                                                                                                                                           |
| 1891    | 713346-<br>713362 | Letter to M.W. Jones from Heisler, dated 4/11/77; letter to Heisler from M.W. Jones, dated 3/1/77; Industrial Hygiene Survey of the PCB Production Operation, Monsanto Industrial Chemicals Co., dated 7/21-7/22/76                                                        |
| 1892    | 706700-<br>706702 | Excerpt from brochure on askarels; author & date unknown                                                                                                                                                                                                                   |
| 1893    | 706687-<br>706699 | Brochures: How to Check Test Your Askarel Insulation! Care and Grooming of Askarel Transformer Fluid; prepared by Monsanto, undated                                                                                                                                        |
| 1894    | 901110-<br>901120 | Memo to Bergen, Bratsch, from Papageorge, re National Academy of Science - Decision Making Workshop, dated 12/24/74; attached Draft - Case Study PCBs Study of Principles of Decision Making for Chemicals in the Environment, National Academy of Science, dated 12/20/74 |
| 1895    | 901158-<br>901160 | Monsanto PCB Position Paper; by "RGP", dated 11/13/75                                                                                                                                                                                                                      |
| 1896    | 903215-<br>903216 | Note to Editors from Monsanto Company, re PCB Hazards - Facts & Fallacies; author unknown, dated 9/26/60                                                                                                                                                                   |
| 1897    | 302303-<br>302319 | Memo to Bryant from Heasley, Westinghouse, re Asbestos Products & Employee Exposure to Asbestos, dated 7/7/81                                                                                                                                                              |
| 1898    | 300104-<br>300106 | Handwritten notes by J.J. Bair, Westinhouse, dated 3/3/88                                                                                                                                                                                                                  |
| 1899    | 300089-<br>300096 | Memo to J.J. Bair from C.W. Bickerstaff, Westinghouse, dated 12/15/87                                                                                                                                                                                                      |
| 1900    | 300086            | Memo to W. Bickerstaff from J.J. Bair, Westinghouse, dated 11/19/87                                                                                                                                                                                                        |
| 1901    | 300441-<br>300469 | (Draft) memo to (not stated) from J.J. Bair, C.W. Bickerstaff; undated; attached handwritten notes identifying tab numbers                                                                                                                                                 |

| Exhibit | Bates No.         | Description                                                                                                                                                                |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1902    | 300307-<br>300308 | Memo to Hanratty from Newmyer Associates, re Occupational Disease Notification H.R. 162, S. 79) - House and Senate Delays; dated 5/13/87                                   |
| 1903    | 300376-<br>300380 | Section by Section Analysis of H.R. 162; "High Risk Occupational Disease Notification and Prevention Act of 1987"; author & date unknown                                   |
| 1904    | 300437-<br>300440 | Excerpt from unidentified document & draft of same; author unknown, dated 11/6/87 & 12/1/87                                                                                |
| 1905    | 763066-<br>763090 | Polychlorinated Biphenyls - PCBs - A Report on Uses, Environmental and Health Effects and Disposal; prepared by Monsanto, undated                                          |
| 1906    | 763061-<br>763062 | Letter to Speicher from Wheeler, dated 7/25/56                                                                                                                             |
| 1907    | 763025-<br>763049 | A status Report on Chlorinated Diphenyls, Regarding Environmental Pollution; by Dakin, Mandelcorn, dated 12/27/71                                                          |
| 1908    | 762905-<br>762931 | National Conference on the Application of Electrical Insulation Technical Papers Presented: Properties of Transformer Askarels; by Benignus, Ellenburg (Monsanto), undated |
| 1909    | 762903-<br>762904 | Safe Practice Data Sheet C-10 - Chlorinated Diphenyls and Chlorinated Naphthalene; prepared by Westinghouse, dated 1/2/53                                                  |
| 1910    | 762900-<br>762902 | Process Specification No. 290219-B - Inerteen #7336; prepared by Westinghouse, approved by Minor, accepted by Fawcett; dated 7/26/33, changed 1/28/35                      |
| 1911    | 762890-<br>762899 | Inerteen Transformers; prepared by Westinghouse, revised 1/42                                                                                                              |
| 1912    | 762815-<br>762828 | IEEE Guide for Acceptance and Maintenance of Transformer Askarel in Equipment; prepared by IEEE, dated 1974                                                                |
| 1913    | 763330            | Memo to Pickett, McNally, G. Miller from (not stated); dated 9/21/67                                                                                                       |
| 1914    | 761567-<br>761578 | Policy - Procedure: Handling and Disposal of Liquid Transformer Dielectrics; prepared by A.F. Kaiser, dated 4/23/71                                                        |

| Exhibit | Bates No.         | Description                                                                                                                                         |
|---------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| 1915    | 761379-<br>761383 | Westinghouse capacitor labels; dated 9/29/70, 8/3/70, 7/2/71, 9/15/71                                                                               |
| 1916    | 761340-<br>761342 | Letter to Wigart, from Barnes, dated 9/15/47                                                                                                        |
| 1917    | 761337            | Toxicity Information On: Inerteen PPO - Westinghouse; prepared by Monsanto, dated 7/14/76                                                           |
| 1918    | 761329-<br>761331 | Data Sheet for Toxicological and Safe Handling Information for Inerteen Insulating Fluid; prepared by Speicher, dated 7/13/72                       |
| 1919    | 761323-<br>761325 | (Rough Draft) Polychlorinated Biphenyl Waste Control & Disposal; author & date unknown                                                              |
| 1920    | 761263-<br>761264 | Letter to Speicher from Garrett, dated 11/1/67; attached Inerteen label                                                                             |
| 1921    | 900991-<br>900993 | Memo to Sauter, Brittain, Fink, Wheeler, Thompson, Brusoski, Hogan, from McClain, re Inerteen - Possible Environmental Contamination, dated 7/23/70 |
| 1922    | 900968-<br>900969 | Memo to R.E. Kelly from Wheeler, dated 3/7/69                                                                                                       |
| 1923    | 900889            | Memo to Brittain from McClain, re PCB Environmental Pollution, dated 8/2/71                                                                         |
| 1924    | 900319-<br>900322 | Letter to R. Rock from Wheeler, dated 3/19/69                                                                                                       |
| 1925    | 900115-<br>900117 | (Handwritten) memo to MLK from OEF, re IBT B7298 & B7299 - Aroclors; dated received 12/9/71                                                         |
| 1926    | 900112            | Letter to Monsanto from Richter, American College of Veterinary Pathologists, dated 10/10/71                                                        |
| 1927    | 900082-<br>900083 | Memo to R.E. Kelly, Johnson, Wheeler, from Levinskas, dated 10/13/71                                                                                |
| 1928    | 900076            | Summary of Aroclor 1260: Meeting at NCI 1/31/75; prepared by Levinskas, dated 2/3/75                                                                |
| 1929    | 900015-<br>900918 | Letter to W.F. Ryan from J. Mason, dated 3/24/71                                                                                                    |

| Exhibit | Bates No.         | Description                                                                                                                                                       |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1930    | 900013-<br>900014 | Letter to E.J. Bock from W.F. Ryan, dated 4/9/70                                                                                                                  |
| 1931    | 900007-<br>900012 | Letter to W.F. Ryan from J. Mason, dated 6/30/70                                                                                                                  |
| 1932    | 900004-<br>900006 | Letter to J. Mason from W.F. Ryan, dated 6/18/70                                                                                                                  |
| 1933    | 900000-<br>900003 | Letter to W.F. Ryan from J. Mason, dated 4/28/70                                                                                                                  |
| 1934    | 760330            | Memo to Sauter, Brittain, Wheeler, G.L. Miller, McClain, Sawyer, Shoaf, Pickett, Nichols, Thompson, Maguire, Curl, Ripplinger, Swafford, from Hogan, dated 9/8/70 |
| 1935    | 900433-<br>900434 | Memo to Field Sales Offices, Plant Communicators, Pollution Control Engineers, Plant Managers from E.V. John, P.B. Hodges, Monsanto, dated 10/6/69                |
| 1936    | 900444            | Memo to Bergen, W.R. Richard from Kuhn, dated 9/16/69                                                                                                             |
| 1937    | 900603            | Memo to Paton, Sutton, Ford, Hansen, Mellon, Slayton, from Gossage, dated 8/29/75                                                                                 |
| 1938    | 900720-<br>900721 | Memo to Brittain from McClain, dated 12/27/71                                                                                                                     |
| 1939    | 900602            | Memo to Fague, Hatton, A.A. Johnson, Koch, Rosenberg, Wood, Brewer, Sandifer, Pils, from Paton, dated 8/21/75                                                     |
| 1940    | 901137            | Memo to Mieure from Papageorge, dated 12/6/74                                                                                                                     |
| 1941    | 901201-<br>901206 | Memo to Papageorge from Wheeler, dated 11/3/70                                                                                                                    |
| 1942    | 903817-<br>903861 | Monsanto PCB Labeling Manual; author unknown, dated 11/1/73                                                                                                       |
| 1943    | 907281-<br>907290 | Particulate Contamination in the Binghamton State Office Building, by G.A. Eadon, NYS Dept. of Health, undated                                                    |
| 1944    | 907435-<br>907442 | Rapid Cleansing of PCBs from Transformer Windings; by G. Tappa, J. Olmsted, Positive Technologies Inc.; undated                                                   |

| Exhibit | Bates No.         | Description                                                                                                                                           |
|---------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1945    | 907672-<br>907679 | The Utility PCB Dilemma - Retrofill or Replacement? by Forrester, Milby; undated                                                                      |
| 1946    | 908178-<br>908191 | Polychlorinated Dibenzofurans and PCB-Transformer Fires: Toxic Hazards and Determination of Decontamination Guidelines; by Milby, Forrester; undated  |
| 1947    | 300867            | Memo to Pitts from J.J. Bair, dated 4/5/88                                                                                                            |
| 1948    | 300868-<br>300870 | (Excerpts from) memo to Massaro from Bickerstaff, dated 11/5/87                                                                                       |
| 1949    | 300855-<br>300860 | Attachment "A" Categories of Documents to be Collected; attached handwritten notes re I. H. Documents; author & date unknown                          |
| 1950    | 300890-<br>300954 | Other Items - Review of Safety Files Completed by Jeff Bair. P. Palmieri to Make Final Recommendation by 3/31/88; attached handwritten notes; undated |
| 1951    | 301031-<br>301035 | Handwritten notes entitled Document - Grouping - 1978-Present; author & date unknown                                                                  |
| 1952    | 301061-<br>301070 | Handwritten notes by J.J. Bair, Westinghouse; undated                                                                                                 |
| 1953    | 737977            | Memo to R.E. Kelly from Tucker, re blood sample analysis, dated 4/10/72                                                                               |
| 1954    | 737978            | Letter to J.C. Davies from R.E. Kelly, dated 5/10/72                                                                                                  |
| 1955    | 737979            | Memo to D.C. Otto from R.E. Kelly, dated 7/7/72                                                                                                       |
| 1956    | 760464            | Memo to Brittain, McClain from Sauter, re PCBs - Inerteen, dated 9/30/74                                                                              |
| 1957    | 910386-<br>910390 | Work request to Materials and Processes Laboratory, re PCBs; requested by Harbell, dated 4/17/70                                                      |
| 1958    | 910391-<br>910563 | Assessment of the Environmental and Economic Impacts of the Ban on Imports of PCBs - Final Task Report; prepared by VERSAR INC. for EPA, dated 7/8/77 |
| 1959    | Illegible         | 09/01/81 Memo from D. Fabbi to D. Brookyser                                                                                                           |

| Exhibit | Bates No.  | Description                                                                             |
|---------|------------|-----------------------------------------------------------------------------------------|
| 1960    | Illegible  | 1988 Substation De-Tox, 08/188/88 (with attachments)                                    |
| 1961    | Illegible  | 03/31/80 Notice of Hearing                                                              |
| 1962    | Illegible  | Before the Hearing Officer                                                              |
| 1963    | Illegible  | NPC Interoffice Memorandum from D. Fabbi to Distribution List, dated 10/30/85           |
| 1964    | Illegible  | 08/26/81 Memo from D. Fabbi to D. Brookyser                                             |
| 1965    | Illegible  | 11/22/76 Letter from D. Keiser to Industry Purchasing Executives                        |
| 1966    | Illegible  | 02/15/89 PCB Equipment, Dates Manufacturers Ceased Production                           |
| 1967    | No number  | NPC PCB Transformers for Disposal, undated                                              |
| 1968    | 7          | Material Safety Data Sheet 05/71                                                        |
| 1969    | 19-63      | Report - Pyranol Transformers (Instructions GEH 1093B)                                  |
| 1970    | 41__       | 02/22/88 Memo from J. Hayes to B. Yadegar                                               |
| 1971    | 105__ - __ | 11/05/86 NPC Specific Work Order No. G60081, Stardust Hotel Transformer Detoxification  |
| 1972    | 191__      | 10/08/87 Letter from D. Fabbi to D. Bannerman                                           |
| 1973    | 396-407    | Material Safety Data Sheet, May 1971, approval expires 07/30/72 (Defendants' Exhibit N) |
| 1974    | 1084-1106  | Warehouse cards                                                                         |
| 1975    | 1107-1262  | Inventory List                                                                          |
| 1976    | 1299-1378  | PCB Spill Prevention and Handling Procedures                                            |
| 1977    | 1355       | Date of inventory                                                                       |
| 1978    | 1560       | 10/06/81 Memo from D. Fabbi to A. Hofmeister                                            |

| Exhibit | Bates No. | Description                                                                             |
|---------|-----------|-----------------------------------------------------------------------------------------|
| 1979    | 1581      | Release Form                                                                            |
| 1980    | 1585-1583 | PCB Survey                                                                              |
| 1981    | 1592      | 11/16/81 Memo from D. Fabbi to J. McCarthy                                              |
| 1982    | 1840-1845 | Various dates, Handwritten notes                                                        |
| 1983    | 1946      | Media article - Great Lake Birds Called Imperiled                                       |
| 1984    | 1948      | 07/30/88 Nevada Power Fined for PCB Rules Violations                                    |
| 1985    | 1950      | Study Says PCB's Not Carcinogenic                                                       |
| 1986    | 1954-1955 | 04/22/88 Letter                                                                         |
| 1987    | 1956-1960 | UI Initiated Priority 1 Program to Phase out PCB                                        |
| 1988    | 1963-1964 | Magazine article                                                                        |
| 1989    | 1967      | 10/08/87 Letter from D. Fabbi to D. Bunnerman                                           |
| 1990    | 1973      | PCB Analysis technique more accurate than most                                          |
| 1991    | 1976      | Straight Talk on PCB's                                                                  |
| 1992    | 1977      | Workers Fear Dioxin Poisoning                                                           |
| 1993    | 1980-1982 | PCB Update                                                                              |
| 1994    | 1986-1989 | National Safety Council Newsletter                                                      |
| 1995    | 2000-2004 | PCB Technical Report                                                                    |
| 1996    | 2006-2010 | PCB Update                                                                              |
| 1997    | 2038-2039 | Chemical Fires                                                                          |
| 1998    | 2043      | Electrical Blast Closes Office                                                          |
| 1999    | 2044-2045 | "Officials Stymied on Cleanup of PCB Poison in Structure"                               |
| 2000    | 2059-2079 | 09/28/82 OSHRC Decision Finding that PCB Exposure Presents Probable Serious Health Risk |

| Exhibit | Bates No. | Description                                                                                                                                  |
|---------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 2001    | 2080-2082 | August 83, PCB Update: Mostly Gains, One Major Setback                                                                                       |
| 2002    | 2085      | 06/27/83 Media Article - Electrical Equipment with PCB's Phased Out                                                                          |
| 2003    | 2088-2098 | February 83 Article - The PCB Problem: Separating Fact From Fiction. Author M. McGraw                                                        |
| 2004    | 2100      | 10/29/82 Letter from C. Chin to D. Fabbi                                                                                                     |
| 2005    | 2101-2104 | 10/06/82 ABC News Transcript: PCBs Chemical Poison, National Problem                                                                         |
| 2006    | 2105      | 07/20/81 Letter from J. Samones to Dan                                                                                                       |
| 2007    | 2106      | 05/29/81 Letter from J. Samones to News Director                                                                                             |
| 2008    | 2107-2114 | Series of environmental news announcements from J. Semons, various dates                                                                     |
| 2009    | 2138      | 08/26/81 Media Article: Gas Leak Cleanup Begins                                                                                              |
| 2010    | 2142      | May 82 - Update - PCB Elimination Cost Set at 10-20 Billion                                                                                  |
| 2011    | 2146-2147 | 03/19/81 Media Article: Government Building Example of Toxic Terror                                                                          |
| 2012    | 2161-2166 | 08/11/80 Media Article: Menace Lurks on PG&E Poles                                                                                           |
| 2013    | 2176-2177 | 10/12/79 Media Article - PCB Contamination Woes Grow                                                                                         |
| 2014    | 2180-2183 | Undated article fact sheet: Polychlorinated Biphenyls (PCB's) & PCB-Contaminated Oil Problem Less than Formerly Thought, According to Survey |
| 2015    | 2293-2294 | 08/22/85 Memo from F. Buchanan to R. Gammon re PCB                                                                                           |
| 2016    | 3356-3363 | Total Prevention: PCB Risk Assessment and Elimination                                                                                        |

| Exhibit | Bates No. | Description                                                                                                                                |
|---------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 2017    | 3847      | 1989 PCB Refresher Training and Program Update                                                                                             |
| 2018    | 3854-3858 | 01/09/86 Refresher Training                                                                                                                |
| 2019    | 3942-3945 | Letter from P. McEnroe to D. Fabbi                                                                                                         |
| 2020    | 3957      | PCB: Questions About a Controversial Chemical                                                                                              |
| 2021    | 4091      | 12/22/88 Letter from W. Guse to D. Fabbi                                                                                                   |
| 2022    | 4119-4120 | List of Spare PCB Transformers                                                                                                             |
| 2023    | 4218-4219 | Warehouse cards                                                                                                                            |
| 2024    | 4236-4237 | Warehouse cards                                                                                                                            |
| 2025    | 4440-4441 | Warehouse cards                                                                                                                            |
| 2026    | 4450-4452 | Warehouse cards                                                                                                                            |
| 2027    | 4522      | 08/26/83 Memo from Safety Dept. to Dispatchers                                                                                             |
| 2028    | 4566      | 10/30/81 Letter from R. Vernon to B. Yadegar                                                                                               |
| 2029    | 4568      | 10/28/81 Letter from W. Hannon to B. Yadegar                                                                                               |
| 2030    | 4569      | 08/24/81 Letter from R. Pace to B. Yadegar                                                                                                 |
| 2031    | 5167-5218 | NPC PCB Electrical Equipment and Non-Liquid Waste Removed from service in storage and marked for disposal, date of inventory July 25, 1986 |
| 2032    | 5219-5259 | NPC PCB Annual Report 1984                                                                                                                 |
| 2033    | 5579-5590 | 04/27/89 Letter from D. Fabbi to M. Grisieu                                                                                                |
| 2034    | 5613      | 02/15/89 Letter from F. Garrison to D. Fabbi                                                                                               |
| 2035    | 5615 (?)  | 02/10/89 Letter from R. Pace to D. Fabbi                                                                                                   |
| 2036    | 5624      | 12/22/88 Letter from W. Guse to Mr. Fabbi                                                                                                  |

| Exhibit | Bates No. | Description                                                                        |
|---------|-----------|------------------------------------------------------------------------------------|
| 2037    | 5625      | 02/15/89 Letter from F. Garrison to D. Fabbi                                       |
| 2038    | 5626-5628 | 09/04/81 Letter from D. Layton to B. Yadegar                                       |
| 2039    | 5660      | 02/14/89 Letter from D. Fabbi to F. Garrison                                       |
| 2040    | 5685-5687 | 11/22/88 Memos from D. Fabbi to D. Fjare                                           |
| 2041    | 5690-5696 | Federal Register, Part III, EPA                                                    |
| 2042    | 5746-6576 | Cover page, 09/26/84 Memo from D. Fabbi to R. Whatley                              |
| 2043    | 5768-5776 | PCB Changeout and Retrofill Program, Summary                                       |
| 2044    | 5777-5783 | 08/10/87 Memo from D. Fabbi to D. Fjare                                            |
| 2045    | 5786-5791 | 08/03/87 Memo from D. Fabbi to D. Fjare                                            |
| 2046    | 5792-5793 | 10/02/84 Memo from R. Whatley to D. Fabbi                                          |
| 2047    | 5796-5813 | 09/25/84 Memo from D. Fabbi to J. Kenick (with attached documents)                 |
| 2048    | 5824-5832 | NPC Hotel Transformers, Convention Center Transformers, 08/21/89(?)                |
| 2049    | 5871-5872 | 05/26/89 Letter from D. Fabbi to L. Fofi, Chief Engineer                           |
| 2050    | 6319      | 08/31/87 EPRI Report Summary                                                       |
| 2051    | 6338      | "Absorbed PCBs Lot Over Time", Occupational Health & Safety, July/Aug. 1984        |
| 2052    | 6339-6354 | 01/12/83 PCB's OSHA Task Force Update                                              |
| 2053    | 6353      | Article "Possible Adverse Effects of PCBs on Reproduction to be Studied by NIOSH   |
| 2054    | 6354      | Article "NIOSH Corrects Study Plan Language Calling PCBs Human, Animal Carcinogens |

| Exhibit | Bates No. | Description                                                                                                     |
|---------|-----------|-----------------------------------------------------------------------------------------------------------------|
| 2055    | 6355      | Article "NEMA Told PCBs Not Harmful to Humans"; EPA Approves PCB - Destruction Process                          |
| 2056    | 6356      | Article "Report on the Perils of PCBs"                                                                          |
| 2057    | 6357      | "Idaho Town Tested for PCB Poison"                                                                              |
| 2058    | 6359      | "Tests to determine extent of PCB poisoning"                                                                    |
| 2059    | 6374      | Article "PCBs can cause some health problems in humans, animals"                                                |
| 2060    | 6375      | 10/06/82 Letter from D. Fabbi to L. Spragins                                                                    |
| 2061    | 6376      | Article "Doctor says PCB exposure not related to cancer"                                                        |
| 2062    | 6439      | FDA Limits on PCB Concentrations in Food                                                                        |
| 2063    | 6448-6465 | NPC Food and Feed Location Survey, June 21, 1982, Mark Reddaway (with attached documents)                       |
| 2064    | 6477-6488 | PCB's: A Report by the American Council on Science and Health                                                   |
| 2065    | 6489-6494 | PCB's: Questions and Answers, Edison Electric Institute publication                                             |
| 2066    | 6495-6501 | Perspectives, NEMA publication                                                                                  |
| 2067    | 6501-(?)  | 04/05/83 Letter from R. Hirsch to D. Fabbi.                                                                     |
| 2068    | 6502-6512 | PCB Health Effects Study                                                                                        |
| 2069    | 6514      | 06/09/83 Letter to Senior Communication Executives from Edison Electric Institute                               |
| 2070    | 6525-6527 | 12/01/83 Transmittal slip from D. Fabbi to J. McCarthy with attached 11/30/83 memo from M. Reddaway to D. Fabbi |
| 2071    | 6532-6534 | 07/22/81 Memo from D. Fabbi to J. Crum, D. Odell, T. Leavitt                                                    |

| Exhibit | Bates No. | Description                                                                                                                               |
|---------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 2072    | 6541-6549 | 09/26/79 Letters from D. Fabbi to Chief R. Parrish, Chief Kimball, Chief Cooper, Chief Star; 10/05/79 Letter from S. Cooper to D. Fabbi   |
| 2073    | 6557-6558 | 09/21/81 Memo from D. Fabbi to S. Claeys                                                                                                  |
| 2074    | 6559      | 07/01/81 Memo from D. Fabbi to S. Claeys                                                                                                  |
| 2075    | 6571-6573 | Consent Agreement as proposed by NPC<br>07/08/90                                                                                          |
| 2076    | 6576-6578 | Live Wire, Company Adopts PCB Policy                                                                                                      |
| 2077    | 6580      | 03/09/79 Memo from D. Fabbi to K. Grant                                                                                                   |
| 2078    | 6581      | 07/10/80 Memo from D. Fabbi to J. Driscoll                                                                                                |
| 2079    | 6582      | 10/22/79 Memo from D. Fabbi to<br>Distribution List re: PCB Control and<br>Handling Procedures                                            |
| 2080    | 6590      | 12/15/76 Memo from D. Fabbi to<br>Distribution List re: Capacitor Grade<br>Askarel/Product Safety Data                                    |
| 2081    | 6591      | 03/02/79 Memo from D. Crotta to C.<br>Kaiser and R. Whatley                                                                               |
| 2082    | 6596      | "Dioxins: A Polychlorinated Perplexity,"<br><u>Health and Environment</u>                                                                 |
| 2083    | 6598      | "PCDF/PCDD - Partial Oxidation Products<br>of PCB," EPRI Technical Brief                                                                  |
| 2084    | 6607-6609 | Polychlorinated Dibenzofurans (PCDF) and<br>Polychlorinated Dibenzo-p-Dioxins (PCDD)<br>in Utility Transformers and Capacitors,<br>Vol. 1 |
| 2085    | 6719-6722 | Consent Agreement, Second Draft, as<br>proposed by NPC, 08/08/80                                                                          |
| 2086    | 6926      | NPC Total PCB Spills, 1/79 through 12/85                                                                                                  |
| 2087    | 6930-6934 | 07/18/85 Memo from D. Fabbi to W. Henson                                                                                                  |
| 2088    | 6935-6937 | 03/02/83 Memo from M. Reddaway to S.<br>Claeys                                                                                            |

| Exhibit | Bates No.   | Description                                                                                                                 |
|---------|-------------|-----------------------------------------------------------------------------------------------------------------------------|
| 2089    | 6939-6942   | NPC Streelight Transformer PCB Capacitor Locations                                                                          |
| 2090    | 7363-7384   | 11/26/85 Memo from M. Reddaway to G. Smith, J. McCarthy                                                                     |
| 2091    | 7391        | Consent Agreement and Final Order In re: Nevada Power Company (on reverse side is 07/01/87) Specific Work Order No. 5-76490 |
| 2092    | 7394        | 05/24/88 Memo from D. Fabbi to D. Fjare                                                                                     |
| 2093    | 7494-7608   | Exhibit 62, Criteria and recommended standard . . . Occupational Exposure to PCBs, 09/77                                    |
| 2094    | 7609-7700   | Exhibit 63, The PCB Regulations Under TSCA: Over 100 Questions and Answers to Help You Meet These Requirements, 08/83       |
| 2095    | 8207-8218   | PCB's: Human and Environmental Hazards, 1983                                                                                |
| 2096    | 8219-8225   | "Human Health Effects of PCBs and Polybrominated Biphenyls (PBBs)"                                                          |
| 2097    | 8248-8249   | "The 1985 PCB Transformer Regulations;" <u>Hazardous Substances</u> , 12/85                                                 |
| 2098    | 8471        | 04/24/86 Letter from G. Denio to C. Marsden                                                                                 |
| 2099    | 8481        | NPC PCBs Control & Handling Procedures (page 1 only)                                                                        |
| 2100    | 8483        | 09/04/84 Letter from R. Parrish to J. McCarthy                                                                              |
| 2101    | 8484        | 05/24/78 Letter from J.M. Leavitt to D. Fabbi                                                                               |
| 2102    | 8485        | Letter from P. McEnroe to DEME                                                                                              |
| 2103    | 8486        | 10/18/79 IEEE Program: Control & Disposal of PCBs (Askarels Capacitor & Transformer Oils)                                   |
| 2104    | 10151-10152 | 02/01/82 Letter from M. Reddaway to Factory Mutual Corporation                                                              |

| Exhibit | Bates No.   | Description                                                                                                              |
|---------|-------------|--------------------------------------------------------------------------------------------------------------------------|
| 2105    | 10154-10155 | 12/04/81 Letter from R. McGearty to B. Yadegar, NPC                                                                      |
| 2106    | 10156-10160 | 10/26/81 Letter from R. McGearty to B. Yadegar, NPC                                                                      |
| 2107    | 10162       | 10/29/81 Letter from W. Hannon to B. Yadegar                                                                             |
| 2108    | 10163       | 09/28/81 Letter from R. Vernon to B. Yadegar                                                                             |
| 2109    | 10164-10169 | Cover Page, Transformer Identification Survey for PCB - Filled Equipment<br>Hotels, Convention Facilities, and Hospitals |
| 2110    | 10186(?)    | Certification Report PCB's in Transformer Oil, 01/30/81                                                                  |
| 2111    | 10676       | List re: Location, Serial Number, Gallons, PPM                                                                           |
| 2112    | 10679-10681 | 10/23/87 Memo from D. Fabbi to D. Fjare                                                                                  |
| 2113    | 10682-10683 | 11/20/87 NPC Substations Transformer Locations & PCB Removal Dates                                                       |
| 2114    | 10690-10692 | 1988 Substation De-Tox                                                                                                   |
| 2115    | 10802       | 07/21/87 Letter from D. Merten to D. Fjare                                                                               |
| 2116    | 10803-10805 | SUNOH10 PCBX Oil Test Report                                                                                             |
| 2117    | 10939       | 12/20/82 Letter from W. Maling to C. Ryan                                                                                |
| 2118    | 11003-11009 | Federal Register, April 2, 1987, Part III, EPA                                                                           |
| 2119    | 11039-11040 | 06/08/87 Memo from D. Fabbi to D. Crotta, S. Claeys, D. Fjare, W. Henson, F. Yadegar, R. Whatley                         |
| 2120    | 11041-11064 | Federal Register, July 8, 1987, Proposed Rules                                                                           |
| 2121    | 11080-11086 | TSCA Compliance Program Policy No. 6 - PCB - 6, received stamp 09/01/83                                                  |

| Exhibit | Bates No.   | Description                                                     |
|---------|-------------|-----------------------------------------------------------------|
| 2122    | 11088-11090 | Federal Register, May 1, 1987 Proposed Rules                    |
| 2123    | 11112-11128 | Federal Register, July 17, 1985 Part IV, Rules & Regulations    |
| 2124    | 11129-11143 | 09/14/93 EPA Notice and Attachments                             |
| 2125    | 11178-11196 | Federal Register, August 25, 1982, Part II, Rules & Regulations |
| 2126    | 11254-11257 | 07/22/85 Transmittal Slip to J. McCarthy                        |
| 2127    | 11258-11265 | Federal Register, March 23, 1984, Part III, Proposed Rules      |
| 2128    | 11266-11269 | Federal Register, October 11, 1984, Part III, Proposed Rules    |
| 2129    | 11270-11275 | Federal Register, March 20, 1984, Part IV, Rules & Regulations  |
| 2130    | 11283-11291 | Federal Register, March 20, 1981, Part III, Rules & Regulations |
| 2131    | 11400-11409 | Re: Stardust North Sub.                                         |
| 2132    | 11458-11465 | 02/17/98 Federal Register, Part V                               |
| 2133    | 11466-11486 | 06/79 EPA's Final PCB Ban Rule Report                           |
| 2134    | 11487-11517 | 05/31/79 Federal Register, Part VI                              |
| 2135    | 11518-11534 | Part 261 - Identification and Listing of Hazardous Waste        |
| 2136    | 11535-11554 | Part 267.45 Treatment of Waste                                  |
| 2137    | 11568-11616 | 1978 - 10/21/76 The Resource Conservation and Recovery Act      |
| 2138    | 11860-11861 | 03/12/87 Letter form M. Litt to G. Matteucci                    |
| 2139    | 11862-11864 | 03/19/87 Memo from M. Reddaway to J. McCarthy                   |
| 2140    | 11918       | 05/31/83 Letter from D. Fabbi to Mr. and Mrs. C. Schreiber      |
| 2141    | 11950       | 12/01/80 Memo from DRW to JF                                    |

| Exhibit | Bates No.                   | Description                                                              |
|---------|-----------------------------|--------------------------------------------------------------------------|
| 2142    | 11959                       | 02/20/81 Phone Conversation From Sunrise Hospital to D. Fabbi            |
| 2143    | 11964-11965                 | 07/27/81 Memo from M. Reddaway to J. McCarthy                            |
| 2144    | 12015-12016                 | 12/09/80 Letter from D. Fabbi to Personal Sampling                       |
| 2145    | 12017-12023;<br>12026-12037 | 12/09/80 Variety of Soil Reports                                         |
| 2146    | 12038-12039                 | 10/28/80 Soil Sample Report                                              |
| 2147    | 12040-12042                 | 10/06/80 Soil Sample Report                                              |
| 2148    | 12240-12241                 | 07/30/89 Meida article "Nevada Power Sues Monsanto, GE and Westinghouse" |
| 2149    | 12286-12288                 | PCB Disposal Costs, August 88                                            |
| 2150    | 12291-12300                 | Lists of Replacement Costs                                               |
| 2151    | 13260-13271                 | 10/05/81 Report from R. Gresham to D. DeLanoy                            |
| 2152    | 13273; 13275                | 06/25/81 Letter from M. Riseman to Nevada Power Company                  |
| 2153    | 13296-13298                 | Stipulation (Musgrove Claimant)                                          |
| 2154    | 13299                       | 06/29/81 Order for Hearing                                               |
| 2155    | 13303-13305                 | 09/30/80 Letter from M. Cook to B. Fitzharris                            |
| 2156    | 13306-13316                 | 06/27/80 Letter from D. Fabbi to W. Sutcliffe                            |
| 2157    | 13317                       | 06/25/80 Letter from W. Sutcliffe to D. Fabbi                            |
| 2158    | 13318                       | Handwritten Notes                                                        |
| 2159    | 13319-13328                 | Report 09/77, Occupational Exposure to PCB's                             |
| 2160    | 13329-13330                 | 03/14/80 Before the Hearing Officer                                      |
| 2161    | 13331                       | 03/17/80 Letter from Musgrove to K. Johnston                             |

| Exhibit | Bates No.     | Description                                                                                                                                                     |
|---------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2162    | 13332         | 03/05/80 Medical Report                                                                                                                                         |
| 2163    | 13333         | 12/20/79 Interim Order                                                                                                                                          |
| 2164    | 13334-13364   | Claim History                                                                                                                                                   |
| 2165    | 13365         | 09/13/79 Daily Operating Report                                                                                                                                 |
| 2166    | 13366-13371   | 10/02/79 Industrial Injury Report                                                                                                                               |
| 2167    | 13372         | Notice of Taking Deposition                                                                                                                                     |
| 2168    | 13373-13381   | Chlorodiphenyl                                                                                                                                                  |
| 2169    | 14361-14364   | 07/10/79 Letter from J. Carey                                                                                                                                   |
| 2170    | 14436-14439   | Handwritten Notes                                                                                                                                               |
| 2171    | 14667-14745   | 12/02/86 PCB Capacitor Bank - Removal<br>Record Date                                                                                                            |
| 2172    | 14766         | 04/21/80 Letter from R. Pace to J.<br>McCarthy                                                                                                                  |
| 2173    | 16676         | NPC PCBs Control and Handling Procedures<br>form <u>re</u> : Capacitor Bank Maintenance<br>Record                                                               |
| 2174    | 16677         | NPC PCBs Control and Handling Procedures<br>form <u>re</u> : Interim Measures Program<br>Quarterly PCB Transformer Inspection<br>Form, dated 1985 (2nd quarter) |
| 2175    | 19916         | Professional Safety magazine, November<br>1981 article <u>re</u> : No link between PCBs<br>and human cancer                                                     |
| 2176    | 521294-521309 | 03/07/62 Electrical Features of the High<br>Voltage Switch-Yard Niagara Power<br>Project, L.M. Berry                                                            |
| 2177    | 523001-523007 | Various dates, Handwritten notes                                                                                                                                |
| 2178    | 523009        | 02/22/79 Record of telephone<br>conversation from D. Fabbi to J. Gavin                                                                                          |
| 2179    | 523184        | 10/06/81 Letter from D. Fabbi to A.<br>Hofmeister                                                                                                               |
| 2180    | 523185-523187 | 10/08/81 Meeting Summary                                                                                                                                        |

| Exhibit | Bates No.     | Description                                                                    |
|---------|---------------|--------------------------------------------------------------------------------|
| 2181    | 523515        | 09/12/00 Purchasing Order                                                      |
| 2182    | 523748-523749 | 08/22/85 Memo from F. Buchanan to R. Gammon                                    |
| 2183    | 523750        | 08/28/85 Memo from R. Grove to C. Gamon                                        |
| 2184    | 523752        | Date unknown, memo                                                             |
| 2185    | 523753        | 08/14/85 Memo from N. Nash to Capt. F. Buchanan                                |
| 2186    | 523754        | 06/12/85 Supervisors Incident Investigation Report                             |
| 2187    | 523759-523762 | Media article - "The All Too Common Dangers of PCB's"                          |
| 2188    | 523971        | 12/01/80 Memo from DRW to VF                                                   |
| 2189    | 525124-525127 | 12/18/90 Transformer Storage Pad Clean-up letter frm R. Gegenheimer to W. Ward |
| 2190    | 525217-525218 | 03/09/72 Letter from D. Scherer to S. Claeys                                   |
| 2191    | 525250-525251 | 08/28/79 Letter from C. Ryan to W. Vaughn                                      |
| 2192    | 525252-525253 | 09/14/78 Letter from C. Ryan to W. Vaughn                                      |
| 2193    | 525254-525256 | 09/19/77 Letter from C. Ryan to W. Vaughn                                      |
| 2194    | 525385-525390 | 08/15/84 Letter from J. Schwegler to D. Fjare                                  |
| 2195    | 525401-525404 | Second Supplement to Las Vegas International Hotel                             |
| 2196    | 525405        | 05/20/69 Memo from C. Kaiser to K. Grant re International Hotel                |
| 2197    | 525676-525680 | 05/22/82 Letter from M. Turek to Safety & Industrial Health Committee          |
| 2198    | 525686-525694 | 10/05/82 Memo from W. Trench to Energy & Environment Comm.                     |
| 2199    | 527462        | Sheet with label - Work Order 16349, dated 8-6-81                              |

| Exhibit | Bates No.     | Description                                                                            |
|---------|---------------|----------------------------------------------------------------------------------------|
| 2200    | 528884        | Transformer Test Report, date of test 06/01/86, signed by J.L. Johnson, dated 06/04/86 |
| 2201    | 528923        | 11/10/54 Document re Transformer bank at Clark Station                                 |
| 2202    | 529816        | 07/23/86 Memo from D. Fjare to T. Whisler                                              |
| 2203    | 530085        | Analytical Associates, Inc. test results dated 01/22/87, Report No. 14923              |
| 2204    | 530752        | 12/04/62 Memo from N.G. Pazsitt to Transformer Department, Pittsfield re NPC OUT-60937 |
| 2205    | 530755-530758 | Annual Transformer and/or Regulator Inspection Reports (all for Blue Diamond)          |
| 2206    | 531013-531015 | 12/14/82 Handwritten notes re Clark Bank #4                                            |
| 2207    | 531043-531044 | 12/21/82 Letter from R.G. Pace, Westinghouse to D. Crotta, NPC                         |
| 2208    | 531101-531102 | 08/09/82 Letter from R. Miller, Westinghouse to D. Fjare, NPC                          |
| 2209    | 531814        | 09/07/56 Document re purchase of 2 transformers by Southern NPC                        |
| 2210    | 531817        | 09/16/63 ? (date partially illegible) Westinghouse customer order Q-9502               |
| 2211    | 531819        | 04/03/75 ? (date partially illegible) Westinghouse customer order Q-9999               |
| 2212    | 531842        | 04/03/68 Westinghouse customer order R-21445                                           |
| 2213    | 531867        | 07/10/39 General Electric Memorandum of Shipment of Prints                             |
| 2214    | 532342        | Westinghouse Instructions, Standard Outside Finish for Inerteen Transformer Tanks      |
| 2215    | 532343        | Westinghouse Instructions, Cleaning Transformer Insulation                             |

| Exhibit | Bates No.     | Description                                                                                                                                               |
|---------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2216    | 532507-532529 | 01/17/63 Stearns-Roger Purchase Order R28 B24400 for transformer and supporting specifications                                                            |
| 2217    | 532530-532535 | Stearns-Roger Purchase Orders, file labels re transformer cost                                                                                            |
| 2218    | 532662-532671 | Memorandum of Conference Held in Las Vegas, Nevada July 17-21, 1962                                                                                       |
| 2219    | 532796-532797 | 07/02/73 List of equipment and prices for a Westinghouse W-501-B2 Gas Turbine and Main Transformer                                                        |
| 2220    | 532912-532940 | 04/03/91 Letter from R. Gegenheimer, WT Environmental to W. Ward, NPC enclosing copy of proposal for work at NPC's poleyard site at Highland and Presidio |
| 2221    | 534672-534710 | 07/23/73 Specification No. F234.1T for 480 Volt Load Centers                                                                                              |
| 2222    | 534768-534778 | 09/06/73 Specification No. F4 for 480 Volt Load Centers                                                                                                   |
| 2223    | 534779-534813 | 07/23/73 Specification No. F234.1T for 480 Volt Load Centers                                                                                              |
| 2224    | 535008-535015 | Installation Data                                                                                                                                         |
| 2225    | 535145        | 04/13/66 Letter from J. Zornes to E. Banks re Auxiliary Power Transformer                                                                                 |
| 2226    | 535149-535160 | 01/19/66 Specification #E102 for Auxiliary Power Transformer                                                                                              |
| 2227    | 535179-535181 | Reid Gardner B26525                                                                                                                                       |
| 2228    | 535182-535194 | Reid Gardner B26200                                                                                                                                       |
| 2229    | 535232-535238 | 02/13/00 Specification for Auxiliary Transformer                                                                                                          |
| 2230    | 535297-535299 | Field Reliability Analysis Feedback Report                                                                                                                |
| 2231    | 535308-535309 | Transformers/Transformer evaluation                                                                                                                       |
| 2232    | 535311        | Transformers                                                                                                                                              |
| 2233    | 535575-535577 | 10/15/54 Letter from J. Sparkman to R. Price                                                                                                              |

| Exhibit | Bates No.     | Description                                                                    |
|---------|---------------|--------------------------------------------------------------------------------|
| 2234    | 535597        | 10/15/54 Letter from F. Stevens to R. Price                                    |
| 2235    | 535606-535611 | 07/18/55 Transformers (parts) invoices                                         |
| 2236    | 535629-535632 | 03/21-23/79 Fossil Fuel Power Plants Accomplishments                           |
| 2237    | 535687        | 01/30/79 Letter from R. Skow to Fossil Fuel Power Plants Department Task Force |
| 2238    | 535688        | Handwritten notes                                                              |
| 2239    | 535689-535715 | 03/23/79 EPRI; Solid Waste Disposal Subprogram Review                          |
| 2240    | 535715        | EPRI PCB Disposal Project                                                      |
| 2241    | 535731-535739 | 12/06/55 Specification No. 55                                                  |
| 2242    | 535740-535753 | 10/27/54 Letter and attachments from M. Jones to R. Price re Job A-95000       |
| 2243    | 535809-535819 | 12/00/82 EPRI Research and Development Projects                                |
| 2244    | 535855-535856 | 08/28/79 General P.C.E.A. Information                                          |
| 2245    | 535867-535869 | 09/19/77 Letter from C. Ryan to W. Vaughn                                      |
| 2246    | 535878-535879 | 03/79 Safety Bulletin - Chemical Agents                                        |
| 2247    | 535880-535882 | Report - "Let's Put It All Together"                                           |
| 2248    | 535883-535884 | Know Your Chemical Hazard Symbols                                              |
| 2249    | 535948        | Transformer Liquids                                                            |
| 2250    | 535960-535961 | 07/29/75 Memo from D. Barneby to C. Vaughn                                     |
| 2251    | 536628-536638 | Isoreg Report                                                                  |
| 2252    | 538192-538195 | Specifications for Shunt Capacitors Revised October 1978                       |
| 2253    | 538199-538211 | RTE Product Information                                                        |
| 2254    | 538317        | 08/16/79 EPA Final Rules on PCB's                                              |

| Exhibit | Bates No.     | Description                                                                        |
|---------|---------------|------------------------------------------------------------------------------------|
| 2255    | 538318        | 09/14/79 Letter from D. Draeger to D. Markley                                      |
| 2256    | 538449-538450 | 12/19/73 Letter from J. Magee to D. Markley                                        |
| 2257    | 538670        | 10/15/54 Job No. A-95000                                                           |
| 2258    | 538855        | 11/14/62 Agenda for meeting with Nevada Power Company                              |
| 2259    | 538856-538864 | 10/19/62 Memorandum of meeting with NPC 10/9-11/62                                 |
| 2260    | 538865        | 10/03/62 Agenda for Meeting with NPC                                               |
| 2261    | 538866        | 08/09/62 Agenda for meeting Aug. 16-17, 1962                                       |
| 2262    | 538867-538872 | 08/23/62 Memorandum of conference, Aug. 16-17, 1962                                |
| 2263    | 538873-538881 | 07/25/62 Memorandum of conference, July 17-21, 1962                                |
| 2264    | 549377        | NPC Interoffice Memorandum from Don Fabbi to Marty Fisher, dated 7/24/84           |
| 2265    | 549380        | NPC Memorandum from Mark Reddaway to Steve Claeys, dated 3/2/83                    |
| 2266    | 549498        | 09/16/82 Memorandum from D. Dawson to W. Henson re PCB                             |
| 2267    | 550149        | 10/14/88 Letter from ENSR                                                          |
| 2268    | 550349        | 05/19/65 Letter from A. Bechtold to D. Allsop                                      |
| 2269    | 550734-550751 | Various Reports: Insulating Fluids                                                 |
| 2270    | 550866-550875 | Synopses of Papers, Discussions and Questionnaire on Insulating Fluids             |
| 2271    | 550892-550900 | Human Health Effects of Electrical Grade PCB's                                     |
| 2272    | 550969-550970 | Questions on PCB Handling and Disposal                                             |
| 2273    | 552032        | Articles from Health Hazards; arrow points to "PCB Exposure Was Serious Violation" |

| Exhibit | Bates No.     | Description                                                            |
|---------|---------------|------------------------------------------------------------------------|
| 2274    | 555167        | 07/15/70 Purchase Order                                                |
| 2275    | 555203        | 05/28/68 Purchase Order                                                |
| 2276    | 555217        | 02/13/67 Purchase Order                                                |
| 2277    | 555229        | 06/05/67 Purchase Order                                                |
| 2278    | 555441-555472 | 1953 Blue Diamond Corporation                                          |
| 2279    | 562526        | NPC Interoffice Memorandum from R. Swenson to P. Kobett, dated 11/5/86 |
| 2280    | 562554        | NPC Interoffice Memorandum from R. Swenson to P. Kobett, dated 1/30/87 |
| 2281    | 562676-562678 | Safety and Health Committee Meeting Minutes                            |
| 2282    | 566743-566827 | 04/26-28/92 Minutes of the 166th Meeting (Prime Movers Committee)      |
| 2283    | 5330747       | 03/03/86 Memo from D. Fjare to W. Henson                               |
| 2284    | 5332904       | 05/09/91 Purchase Order                                                |
| 2285    | 1278-1279     | 01/23/87 Letter from D. Fabbi to R. Wiseman                            |
| 2286    | 1299-1345     | 08/85 PCB Spill Prevention and Handling Procedures                     |
| 2287    | 1346-1347     | Material Safety Data Sheet                                             |
| 2288    | 1348-1350     | PCBs Control & Handling Procedures                                     |
| 2289    | 1351-1352     | PCB Fluid Spill or Leak Report                                         |
| 2290    | 1353-1354     | PCB Fluid Spill or Leak Report                                         |
| 2291    | 1356-1359     | PCB Annual Report                                                      |
| 2292    | 1360-1363     | 07/17/85 Federal Register Part IV                                      |
| 2293    | 1364-1369     | 08/25/82 Federal Register Part II                                      |
| 2294    | 1370-1378     | 02/17/78 Federal Register Part V                                       |
| 2295    | 1561-1563     | 10/08/81 Meeting Summary                                               |
| 2296    | 1561-1568     | 10/08/81 Meeting Summary Release Form                                  |

| Exhibit | Bates No. | Description                                                                                                                   |
|---------|-----------|-------------------------------------------------------------------------------------------------------------------------------|
| 2297    | 3897-3899 | Index of Slide Presentation                                                                                                   |
| 2298    | 3903-3904 | 09/26/79 Letter from D. Fabbi to R. Parrish                                                                                   |
| 2299    | 4106-4112 | 02/22/88 Memo from J. Hayes to B. Yadegar                                                                                     |
| 2300    | 4116-4118 | 11/20/87 Transformer Locations and PCB Removal Dates                                                                          |
| 2301    | 4471-4476 | 02/20/86 Memo from D. Fabbi to Nevada Power Staff                                                                             |
| 2302    | 4487-4496 | 08/26/83 Substation Transformers                                                                                              |
| 2303    | 6264-6266 | Health Environment - PCB'S - How Do They Affect Human Health?                                                                 |
| 2304    | 6267-6295 | 02/24/86 NIOSH - Potential Health Hazards from Electrical Equipment Fires of Failures                                         |
| 2305    | 6296-6318 | 08/87 Biological Data Relevant to the Evaluation of Carcinogenic Risk to Humans                                               |
| 2306    | 6320-6330 | 08/13/87 Memo from D. Fabbi to S. Claeys                                                                                      |
| 2307    | 6331-6337 | "PCBs", International Toxicity Update, May/June 1984                                                                          |
| 2308    | 6339-6345 | 01/12/83 Letter from M. Turek, Edison Electric Institute to OSHA Liaison Representatives Member Companies (with attachments)  |
| 2309    | 6346-6348 | 01/04/83 Letter from S. Yohay to Honorable E. Brandt, Jr.                                                                     |
| 2310    | 6349-6350 | 12/03/82 Letter from S. Yohay to J. Doherty                                                                                   |
| 2311    | 6351-6352 | 11/10/82 Letter from M. Turek to J.D. Millar                                                                                  |
| 2312    | 6360-6370 | "Mortality & Industrial Hygiene Study of Workers Exposed to PCBs", <u>Archives of Environmental Health</u> , (Vol. 36, No. 3) |

| Exhibit | Bates No. | Description                                                                                                                                   |
|---------|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| 2313    | 6371-6373 | Highlights of the PCB Health Effects Study (Executed for NEMA/EEI by DFHL & S, Inc.), 03/09/82                                                |
| 2314    | 6377-6398 | 09/30/80 Letter from M. Cook to B. Fitharris                                                                                                  |
| 2315    | 6399-6409 | Analysis of PCB in Human Blood Serum Samples, Final Report Research Request No. 2, Contract 58-01-3248, 10/77                                 |
| 2316    | 6560-6570 | 03/11/81 Dispatcher's Information Bulletin #70, PCB Spills with attached letter to customers and NPC Control and Handling Procedures for PCBs |
| 2317    | 6561-6564 | 07/28/80 Letter to Customer                                                                                                                   |
| 2318    | 6610-6612 | Polychlorinated Dibenzofurans (PCDF) and Polychlorinated Dibenzo-p-Dioxins (PCDD) in Utility Transformers and Capacitors, Vol. 2              |
| 2319    | 8609-8638 | NPC PCBs A Status Report (Submission to Public Service Commission of Nevada)                                                                  |
| 2320    | 8639-8666 | 11/23/79 Memo from D. Fabbi to Distribution List Attaching PCBs Questions & Answers                                                           |
| 2321    | 8667-8732 | 06/08/87 Memo from D. Fabbi to D. Crotta, S. Claeys, D. Fjare, W. Henson, F. Yadegar, R. Whatly                                               |
| 2322    | 8757-8862 | Potential Health Effects in the Human From Exposure to PCB's and Related Impurities, 02/12/82                                                 |
| 2323    | 9465-9467 | Project Plan Reid Gardner Units 1,2 & 3 PCB & PCB Contaminated Transformers Retro-Fill or Petro-Fit Program                                   |
| 2324    | 9590-9612 | 08/27/81 Letter from S. Myers to S. Claeys                                                                                                    |
| 2325    | 9822-9825 | Memo from D. Fabbi to S. Claeys re: PCB Capacitor Bank Changeouts - 1983                                                                      |
| 2326    | 9826-9832 | 07/12/82 Memo from D. Fabbi to K. Grant                                                                                                       |
| 2327    | 9833-9834 | 02/25/82 Memo from D. Fabbi to J. McCarthy                                                                                                    |

| Exhibit | Bates No.   | Description                                                                                     |
|---------|-------------|-------------------------------------------------------------------------------------------------|
| 2328    | 12185-12187 | 06/27/89 Memo from D. Fabbi to J. McCarthy                                                      |
| 2329    | 12304-12305 | Memorandum from D. Fabbi to J. McCarthy, dated 7/13/88                                          |
| 2330    | 16628-16673 | NPC PCB Spill Prevention and Handling Procedures manual                                         |
| 2331    | 16674-16675 | MSDS #233 for Aroclor 1254                                                                      |
| 2332    | 16688-16691 | Federal Register, 40 CFR Part 761, dated 7/17/85                                                |
| 2333    | 16692-16697 | Federal Register, Part II, dated 8/25/82                                                        |
| 2334    | 16698-16707 | Federal Register, Part V, dated 2/17/78                                                         |
| 2335    | 16709-16763 | NPC Substation Maintenance Practices manual                                                     |
| 2336    | 16841-16873 | NPC Book Depreciation Study as of December 31, 1990, prepared by Deloitte & Touche              |
| 2337    | 16875-17020 | NPC Interoffice Memorandum from Reida Solis to Adrienne Budd, dated 9/24/92 (with attachments)  |
| 2338    | 17189-17203 | NPC 1989 Annual PCB Refresher Training and Program Update                                       |
| 2339    | 19880-19881 | Environmental Waste Management Magazine/April 1990 article: PCBs A Clarification of the Problem |
| 2340    | 19882-19884 | ABN Commodities, Ltd., Page 11A-1: Part IX Hazardous, Dangerous or Toxic Information            |
| 2341    | 19885-19892 | NPC The Options Available to Owners of Transformers Containing PCB, dated 11/26/80              |
| 2342    | 19893-19896 | PCB Technical Report - From EPRI, dated 8/31/81                                                 |
| 2343    | 19935-19937 | NPC Substation Transformer Locations and PCB Removal Dates, dated 11/88                         |

| Exhibit          | Bates No.                 | Description                                                                          |
|------------------|---------------------------|--------------------------------------------------------------------------------------|
| 2344             | 19940-19942               | NPC Interoffice Memorandum from Don Fabbi to J. McCarthy and G. Smith, dated 6/27/86 |
| 2345             | 530994-530998             | 03/13/70 Substation Trouble Report form                                              |
| 2346             | 532906-532907             | 04/17/91 Memo from W. Ward to Purchasing                                             |
| 2347             | 532908-532911             | 04/05/91 Specific Work Orders                                                        |
| 2348             | 535855-535856             | 08/28/79 Letter from C. Ryan to W. Vaughn                                            |
| 2349             | 535865-535866             | 09/14/78 Letter from C. Ryan to W. Vaughn                                            |
| 2350             | 549381-549382             | NPC PCB Capacitor Bank Priority Change Out List, undated                             |
| 2351             | 549383-549384             | NPC Memorandum from Donald Fabbi to Keith Grant, dated 8/1/80                        |
| 2352             | 552036-552062             | 11/23/79 PCB's Questions & Answers                                                   |
| 2353             | 555046-555049             | 07/14/81 Survey                                                                      |
| 2354             | 557530-557535             | Letter from Roger Farrow to Dave Fjare, dated 2/19/88                                |
| 2355             | 558432-558434             | 32-NPC Interoffice Memorandum from Ted32-34 Whisler to Fe Gascon, dated 3/6/91       |
| 2356             | 558652-558653             | PCB Transformers Located in Poleyard, undated                                        |
| 2357             | 558971-558974             | Issue Paper on Leaking Transformer Cleanup and Reporting, by Allison Urbon           |
| 2358             | 562480-562485             | NPC Interoffice Memorandum from D. Fabbi to Distribution List, dated 2/20/86         |
| 2359             | Defendants'<br>Exh. M     | Monsanto Material Safety Data Sheet, 07/18/84                                        |
| 2360             | Defendants'<br>Exh. FF    | PCBs, from Compendium                                                                |
| 2361<br>Exh. GGG | Defendants'<br>Facilities | PCBs: An Alert for Food & Feed                                                       |

| Exhibit | Bates No.     | Description                                                                                                                                                                                                                                                                                              |
|---------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2362    | 9580          | GE Instructions Outdoor Power Capacitor Units, GEH-2727A                                                                                                                                                                                                                                                 |
| 2363    | 512858-512925 | GE Induction Voltage Regulators manual                                                                                                                                                                                                                                                                   |
| 2364    | 525257-525272 | Instructions - Inerteen insulating fluid P.D.S. 7336-9 for electrical apparatus                                                                                                                                                                                                                          |
| 2365    | 526120-526127 | 11/00/55 Instructions - GEI - 49414 Autotransformer                                                                                                                                                                                                                                                      |
| 2366    | 526202-526203 | 11/00/64 Instructions - cleaning transformer insulation                                                                                                                                                                                                                                                  |
| 2367    | 526939-526940 | Instructions for Pyranol Transformers GEJ-8316                                                                                                                                                                                                                                                           |
| 2368    | 527067-527076 | Instructions, Pyranol for use in Transformers. Regulators and Reactors, GEI-28006A                                                                                                                                                                                                                       |
| 2369    | 527422-527461 | Field Instructions, Liquid-Filled Power Transformers, ASA 57.12-10                                                                                                                                                                                                                                       |
| 2370    | 527463-527504 | Field Instructions, Liquid-Filled Power Transformers, ASA 57.12-10                                                                                                                                                                                                                                       |
| 2371    | 527550-527552 | Power Transformers General Insulating Oil, 5210-05-3                                                                                                                                                                                                                                                     |
| 2372    | 532021        | Instructions for Cleaning Transformer Insulation                                                                                                                                                                                                                                                         |
| 2373    | 532269-532270 | GE Instructions, Sealed-Tank Transformers, GEI-54032                                                                                                                                                                                                                                                     |
| 2374    | 532282        | GE Instructions, Medium Transformers Pressure-Relief Device, Self-resetting Mechanical Type                                                                                                                                                                                                              |
| 2375    | 532309-532217 | Westinghouse Instructions for Shipment of Transformers in Inerteen (I.L. 48-650-4); Installation of Inerteen Transformers (I.L. 48-650-5B); Determination of Dryness and Methods of Drying Out Inerteen Transformers (I.L. 48-650-6); Operation and Maintenance of Inerteen Transformers (I.L. 48-650-7) |
| 2376    | 532326-532541 | Westinghouse Instructions Inerteen Insulating Fluids P.D.S. 7336-9 for Electrical Apparatus                                                                                                                                                                                                              |

| Exhibit | Bates No.     | Description                                                                                                                                                                                 |
|---------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2377    | 532743-532754 | I.T.E. Imperial Corp. Instructions, Liquid - Immersed Transformers (IB-PD-1000)                                                                                                             |
| 2378    | 534915-535015 | Power Master AKD-5 Low Voltage Switchgear Specifications                                                                                                                                    |
| 2379    | 535127-535142 | Medium Transformers                                                                                                                                                                         |
| 2380    | 535544-535560 | Medium Transformers                                                                                                                                                                         |
| 2381    | 535754-535780 | 08/04/59 Load Center Unit Substation Specifications                                                                                                                                         |
| 2382    | 536099-536114 | Electric Utility Systems and Practice                                                                                                                                                       |
| 2383    | 536148-536149 | Instructions - Gaskets                                                                                                                                                                      |
| 2384    | 536181-536194 | Instructions for Handling Inerteen Insulating Fluid                                                                                                                                         |
| 2385    | 536257-536258 | Instructions for HCL Gas Absorbers                                                                                                                                                          |
| 2386    | 536490-536533 | List of Effective Pages, Allis-Chalmers                                                                                                                                                     |
| 2387    | 536562-536576 | Product catalog                                                                                                                                                                             |
| 2388    | 536577-536627 | Condensed Apparatus Catalog                                                                                                                                                                 |
| 2389    | 538743-538797 | 08/04/59 Load Center Unit Substation Specifications                                                                                                                                         |
| 2390    | 551888-551895 | GE Instructions, Three-Phase, Pad-Mounted Distribution Transformers, GEI-79025J                                                                                                             |
| 2391    | 551907-551922 | Westinghouse Instructions for Inerteen Insulating Fluid P.D.S. 54201 KA                                                                                                                     |
| 2392    | 551972-551987 | GE Brochure, Constant-current transformers and control, GEA-5499A                                                                                                                           |
| 2393    | 551989-551992 | Document entitled <u>Confidential Information</u> , Question No. 17 - PCB Concentration in Pooled Insulating Oil for Reclaiming by D.W. Drofts, Texas Power and Light Company (upper right) |
| 2394    | 555881        | Instructions, cleaning transformer insulation                                                                                                                                               |

| Exhibit | Bates No.                       | Description                                                                   |
|---------|---------------------------------|-------------------------------------------------------------------------------|
| 2395    | 556994-557033                   | Allis-Chalmers Field Instructions for Liquid-Filled Power Transformers        |
| 2396    | 557297-557298                   | GE Instructions (GEJ-831G) for Pyranol Transformers                           |
| 2397    | 557321-557335                   | Kuhlman Electric Instruction Manual 3.010 <u>re</u> : specialty transformers  |
| 2398    | 558049-558063                   | GE Compad Transformers manual                                                 |
| 2399    | 558158-558222                   | GE Induction Voltage Regulators manual                                        |
| 2400    | 550537-550632                   | Series of Reports - Insulating Fluids                                         |
| 2401    | 550642-550648;<br>550710-550718 | Minutes of the Fifty-Fifth Annual International Conference                    |
| 2402    | 550719-550757                   | Minutes of the Annual International Conference                                |
| 2403    | 550758-550775                   | Minutes of the 51st International Conference of Doble Clients, 1984           |
| 2404    | 550776-550823                   | Minutes of the 50th International Conference of Doble Clients, 1983           |
| 2405    | 550824-550864                   | Minutes of the 49th International Conference of Doble Clients, 1982           |
| 2406    | 550865-550944                   | Minutes of the 48th International Conference of Doble Clients, 1981           |
| 2407    | 550945-550976                   | Minutes of the 47th International Conference of Doble Clients, 1980           |
| 2408    | 550977-551011                   | Minutes of the 46th International Conference of Doble Clients, 1979           |
| 2409    | 551012-551079                   | Minutes of the 44th International Conference of Doble Clients, 1977           |
| 2410    | 551080-551084                   | Minutes of the 36th Annual Conference of Doble Clients, 1969                  |
| 2411    | 551085-551088                   | Indexes of Minutes, Annual International Conference of Doble Clients, 1975-80 |
| 2412    | 551089-551106                   | Indexes of Minutes, Annual International Conference of Doble Clients, 1968-74 |

| Exhibit | Bates No.     | Description                                                                                                                                                        |
|---------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2413    | 551173-551340 | Indexes of Minutes, Annual International Conference of Doble Clients, 1935-67                                                                                      |
| 2414    | 558301-558319 | Doble Reference Book on Insulating Liquids and Gases                                                                                                               |
| 2415    | 3384-3397     | Handling and Marking of PCB Insulating Fluid                                                                                                                       |
| 2416    | 3398-3399     | PCB Spill Report                                                                                                                                                   |
| 2417    | 3401-3406     | PCB's in Substation                                                                                                                                                |
| 2418    | 3407-3419     | 11/24/80 Revision of the Operation and Maintenance Manual Section                                                                                                  |
| 2419    | 16764-16837   | The Handling, Storage, Testing and Disposal of Electrical Equipment Containing PCBs manual for SPP Company, dated 3/25/87 (revised 6/89, 7/89, 9/90)               |
| 2420    | 538888-549375 | This Exhibit E consists of the documents bearing inclusive Bates numbers 538888 through 549375. A set of these documents will be provided to plaintiff separately. |
| 2421    | 565651-566363 | This Exhibit F consists of documents bearing inclusive Bates numbers 565651 through 566363. A set of these documents will be provided to plaintiff separately.     |
| 2422    | 559016-566717 | Miscellaneous documents produced by Nevada Power to defendants on or about April 9, 1993 and bearing the inclusive Bates numbers 559016-566717.                    |

CERTIFICATE OF SERVICE

I hereby certify that on the 28, day of May, 1993, the foregoing **PLAINTIFF NEVADA POWER COMPANY'S MAY 28, 1993 ANSWERS TO DEFENDANTS' SEPTEMBER 14, 1992 CONTENTION INTERROGATORIES** was served on the following parties:

KEY:

F - Via fax  
FE - Via Federal Express  
H - Via hand delivery

1<sup>st</sup> Class Mail

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1<sup>st</sup> Class Mail

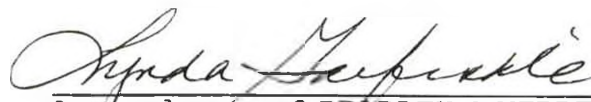
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