

Page 1 1 STATE OF ALABAMA 2 IN THE CIRCUIT COURT FOR ETOWAH COUNTY 3 (Transferred from Calhoun County, Alabama) 4 5 SABRINA ABERNATHY, et al., 6 Plaintiffs, 7 CIVIL ACTION NO. 8 versus CV-2001-832 9 (Consolidated) 10 MONSANTO COMPANY, et al., 11 Defendants. 12 _____/ 13 14 DEPOSITION OF AARON TAYLOR 15 16 The deposition of AARON TAYLOR was 17 taken before Deborah Salers Garrett, Certified 18 Shorthand Reporter, Registered Professional 19 Reporter, as Commissioner, commencing at 11:00 20 a.m. on December 28, 2001, by the Plaintiffs, 21 at the law offices of Fite & Miller, Suite 22 400, SouthTrust Bank Building, Anniston, 23 Alabama, pursuant to the stipulations set forth herein. Regional Reporting Service, Inc. 755 Walnut Street Gadsden, Alabama 35901-0755	Page 3 1 S T I P U L A T I O N S 2 IT IS STIPULATED AND AGREED by the 3 parties, through their respective counsel, 4 that the deposition of AARON TAYLOR may be 5 taken before Deborah Salers Garrett, CSR, RPR, 6 as Commissioner and Notary Public, Alabama at 7 Large, at Anniston, Alabama, on December 28, 8 2001, at 11:00 a.m. 9 IT IS STIPULATED AND AGREED that the 10 signature to and reading of the deposition by 11 the witness is waived, the deposition to have 12 the same force and effect as if full 13 compliance were had with all laws and rules of 14 Court relating to the taking of depositions. 15 IT IS STIPULATED AND AGREED that it 16 shall not be necessary for any objections to 17 be made by counsel to any questions except as 18 to form or leading questions and that counsel 19 may make objections and assign grounds at the 20 time of trial or at the time said deposition 21 is offered in evidence or prior thereto. 22 IT IS STIPULATED AND AGREED that notice 23 of filing by the Commissioner is waived.
Page 2 1 A P P E A R A N C E S 2 For the Plaintiffs: 3 HARRISON COLEMAN, Esq. 4 KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP 5 1633 Broadway 6 New York, New York 10019 7 CHARLES CUNNINGHAM, Esq. 8 Morrissey Building, Suite 200 9 304 West Liberty Street 10 Louisville, Kentucky 40202 11 For the Defendants: 12 EDWARD M. NEWSOM, Esq. 13 LAWRENCE J. MYERS, Esq. 14 SMITH, HELMS, MULLIS & MOORE 15 Suite 750, 1355 Peachtree Street, NE 16 Atlanta, Georgia 30309 17 18 I N D E X 19 Page 20 Stipulations 3 21 Reporter's Certificate 68 22 23 E X A M I N A T I O N S Witness: AARON TAYLOR Page By Mr. Coleman 4 E X H I B I T S Plaintiffs' Marked Offered One 4 No other exhibits were marked for identification, offered or attached as exhibits hereto.	Page 4 1 STATE OF ALABAMA, ANNISTON, DECEMBER 28, 2001 2 3 AARON TAYLOR, 4 after having been first duly sworn, was 5 examined and testified as follows: 6 7 EXAMINATION 8 BY MR. COLEMAN: 9 Q. Mr. Taylor, my name is Harrison Coleman. 10 I'll be taking your deposition this 11 morning. I work for the plaintiffs in 12 this case. 13 Would you please state your full 14 name for the record, please? 15 A. Jessie Aaron Taylor. 16 MR. COLEMAN: And, Mr. Myers, did 17 y'all have an opportunity to 18 talk about the notice of 19 deposition? 20 MR. MYERS: I didn't ask him that. 21 (Plaintiffs' Exhibit Number 22 One was marked for 23 identification.)

Page 5 1 Q. Have you seen this document? It is a 2 notice of deposition requiring you to be 3 here at this office to take your 4 deposition. 5 A. No. 6 Q. In this notice of deposition we had 7 asked you to bring along any documents 8 in your possession which are responsive 9 to that request. Can you just scan 10 that -- 11 MR. MYERS: Read it if you would, 12 Mr. Taylor. Take your time, 13 and read one, two, three, and 14 four. Go ahead and take a 15 minute and read that. 16 Q. Do you have any documents in your 17 possession or at home that are 18 responsive to those requests? 19 A. No, not to my knowledge. 20 Q. Okay. If you come across any documents 21 that you believe are responsive to these 22 requests, would you please make them 23 available to your attorney, who will	Page 7 1 that dealt with PCBs. 2 Mr. Taylor, have you had a 3 deposition before? 4 A. Yes. 5 Q. So you know the rules about speaking 6 clearly and verbally. In other words, 7 don't give an uh-huh or uh-uh as an 8 answer because the court reporter here 9 is going to trying to take down 10 everything, you say and that doesn't 11 come across very well in the record. So 12 if you will please do that, we will all 13 appreciate it. 14 If you don't understand my 15 question, just let me know and I'll 16 rephrase it. If you need to take a 17 break or want a timeout to talk to your 18 attorneys, just let us know, and we will 19 do that? 20 A. Okay. 21 MR. MYERS: And try to speak up 22 just a little because there 23 is a fan over your head.
Page 6 1 then review them and make them available 2 to us? 3 A. Yes. 4 MR. MYERS: And without speaking 5 for Mr. Coleman, what they 6 are interested in is anything 7 other than what might have to 8 do with your retirement and 9 benefits and things like 10 that. 11 Q. For example, did you take any MSDSs home 12 with you? 13 A. No. 14 Q. Did you take any safety manuals home 15 with you? 16 A. No. 17 Q. While we are on the subject, are you 18 retired from Monsanto? 19 A. Yes. 20 Q. Those are the types of documents and 21 materials we are talking about, and 22 specifically also that relate to PCBs or 23 your work in any department at Monsanto	Page 8 1 THE WITNESS: Okay. 2 Q. Will you please state your current 3 address, please? 4 A. 4700 Amberwood Drive, Anniston, Alabama, 5 36207. 6 Q. Where in relation to the Monsanto plant 7 is your home? 8 A. East. 9 Q. How far? 10 A. Approximately five miles. 11 Q. Okay. Have you ever lived anywhere else 12 in Anniston? 13 A. Yes. 14 Q. Would you mind going through those 15 addresses starting with the first and 16 moving forward? 17 A. How far back? 18 Q. Have you lived here all your life? 19 A. Yes. 20 Q. Okay. Let's say from the '60s forward? 21 A. I lived in Saks, north Anniston. 22 Q. Okay. 23 A. I lived west of the Anniston plant in

Page 9 1 the Wellborn community. 2 Q. Wellborn? 3 A. Yes. 4 Q. Okay. And when did you live there? 5 A. From -- I think it was 1965 until 1972 6 -- '92, I'm sorry, '92. 7 Q. 1992? 8 A. Yes. 9 Q. Where is that in relation to the plant? 10 A. West. 11 Q. How far west? 12 A. About two miles. 13 Q. And after 1992 where did you live? 14 A. In the general vicinity where I am now, 15 in the Golden Springs area. 16 Q. Okay. Are you married? 17 A. Yes. 18 Q. Do you have children? 19 A. Yes. 20 Q. How many children do you have? 21 A. Two. 22 Q. Where do they live? 23 A. One lives in the Dearmanville area,	Page 11 1 A. I'm going to have to guess at these 2 dates. 3 Q. That's fair enough. 4 A. About 1966. 5 Q. Okay. And after 1966? 6 A. Storeroom. 7 Q. Okay. 8 A. Shipping and receiving. 9 Q. What was your title in there? 10 A. Just storeroom clerk. 11 Q. How long did you hold that job? 12 A. I'm going to say one year. I don't 13 know. 14 Q. Okay. And -- 15 A. Chief operator. 16 Q. Okay. 17 A. Biphenyl department. 18 Q. From '67 to when? 19 A. I'm going to say '77, in that general 20 vicinity. 21 Q. Okay. And then after that? 22 A. Maintenance department. 23 Q. What was your title?
Page 10 1 which is east of Anniston. The other 2 one lives in Alpharetta, Georgia. 3 Q. How about grandchildren? Do you have 4 any grandchildren? 5 A. Yes. 6 Q. When did you -- When did you start 7 working for Monsanto? 8 A. 1961. 9 Q. I want to go through your job history at 10 Monsanto job by job beginning in 1961 up 11 until your retirement with Monsanto. 12 What I would start with is if you will 13 just give me your job title and the 14 years in which you held that job. And 15 let's start at the beginning and work 16 forward. Then we'll go back, and I want 17 to ask you about your responsibilities 18 in those jobs. For now let's just start 19 with the list. 1961. 20 A. Operator. 21 Q. In what division? 22 A. Aroclor. 23 Q. Okay. And for how long?	Page 12 1 A. Millwright, mechanic. 2 Q. Okay. From 1977 to -- 3 A. About '80, 1980, maybe. 4 Q. Was that also in the biphenyl 5 department? 6 A. In the maintenance department you work 7 all over the plant. Then I became an 8 electrician, E and I, title is E and I. 9 Q. From 1980 until when? 10 A. Retirement. 11 Q. What year did you retire, again? 12 A. 1994. 13 Q. Okay. And were you an electrician, E 14 and I all over the plant or in one 15 particular department? 16 A. All of the plant. 17 Q. Okay. Now, if you don't mind -- and 18 this may take a little while since you 19 had five occupations at the plant. I 20 just want to kind of ask you some 21 general questions about what you did 22 there and what your responsibilities 23 were. Let's start with when you were an

Page 13 1 operator from 1961 to 1966. What were 2 your responsibilities in the Aroclor 3 department as an operator? 4 A. Making the products. 5 Q. Okay. And how did you accomplish that? 6 Did you take raw materials -- 7 A. Yeah. We take the raw materials and put 8 them in the vessels, and it was 9 processed in the vessels. 10 Q. And then after production was there a 11 role that you had, like drumming for 12 example? 13 A. No. 14 Q. What were the raw materials that went 15 into those products, if you can 16 remember? 17 A. One of the products was Santowax, one 18 was biphenyl, chlorine. That's all I 19 can remember. 20 Q. Okay. That's fine. That is fair 21 enough. What safety gear did you wear 22 in your role as operator between 1961 23 and '66?	Page 15 1 A. It was required. 2 Q. What was the punishment if any for not 3 wearing them? 4 A. Reprimands, mostly. 5 Q. Did you ever know anyone to get 6 reprimanded? 7 A. Not to my knowledge. 8 Q. And I take it from your answer that you 9 yourself did not get reprimanded? 10 A. No. 11 Q. During your job as operator between 1961 12 and '66, I think you testified that was 13 in the Aroclor department? 14 A. Yes. 15 Q. Describe the physical attributes of that 16 department. Was it inside? Was it 17 outside? If it was inside, was it open 18 air or just whatever physical attributes 19 you can remember about that department. 20 A. Actual production was outside. We had a 21 control room to run samples, and that 22 was it. 23 Q. Was -- Let's start with the outside.
Page 14 1 A. Gloves. 2 Q. How far up your arm did those gloves 3 extend? 4 A. Above the wrist. 5 Q. Okay. Anything else? 6 A. Face shields, goggles, steel-toe shoes. 7 Q. Hard hat? 8 A. Hard hat, safety glasses. 9 Q. Protective clothing? 10 A. Just general work clothes. 11 Q. Were those work clothes -- Did you take 12 them off at the end of the day and leave 13 them at the plant? 14 A. Yes. 15 Q. They were laundered at the plant? 16 A. Yes, they were laundered. 17 Q. And did you have all of these safety 18 materials from 1961 to '66, for the five 19 years that you were there as an 20 operator? 21 A. Yes. 22 Q. Was it required that you wear them, or 23 was its optional?	Page 16 1 Did you work twelve months a year 2 outside? 3 A. Yes, yes. 4 Q. Do you remember any spills outside of 5 any of the products? 6 MR. MYERS: Object to the form. 7 Go ahead. 8 A. Spills? 9 Q. Yeah. 10 A. I'm sure we had some, but just -- not in 11 general, I can't tell you. 12 Q. None that stick out in your memory? 13 A. No. 14 Q. Do you remember then what your 15 responsibility was if there was a spill, 16 regardless of how big it was or how 17 small it was? 18 A. Contain and clean up the spill. 19 Q. What did that entail? 20 A. Had an oil dry type of material, sand, 21 used sands for oil dry. 22 Q. And that was for containing I guess? 23 A. Yes.

Page 17 1 Q. And how about cleaning up? 2 A. This was also to absorb the liquid, and 3 it was cleaned up. 4 Q. What did you do with the absorbed 5 material? 6 A. It was put in containers like metal 7 drums. 8 Q. And what happened to the metal drums? 9 A. Shipping took care of that. 10 Q. Did you have any responsibility for 11 cleaning it up for the drums? 12 A. Just prop it on a pallet. 13 Q. Did you ever see where shipping took 14 those barrels? 15 A. No. 16 Q. Do you have any knowledge of where they 17 took them? 18 A. I was never connected with that. I'm 19 not familiar with it. 20 Q. Okay. And how about the room where 21 samples were taken? What is that 22 called, again? 23 A. Just the control room.	Page 19 1 Q. Well, did you dip a cup down into a 2 bucket and take a sample, or was there 3 some more detail than that? I just want 4 to know -- 5 A. The vessel that the product was made in 6 had a sample pourer on it. The sample 7 was taken in that container and carried 8 to the control room. 9 Q. So the samples were taken outside? 10 A. Yes. 11 Q. And then taken to the control room? 12 A. Yes. 13 Q. Who was in the control room to receive 14 the samples, just the title of the 15 person in there? 16 A. We did the samples. 17 Q. What I'm trying to get to is what did 18 you do with the samples once they were 19 made? 20 A. They were brought in the control room, 21 set in the sink. They usually had to be 22 cooled to a certain temperature to run 23 the samples.
Page 18 1 Q. Did you have any job duties in the 2 control room? 3 A. Yes. As operators we took the samples 4 and run the samples. 5 Q. Tell me about the ventilation system in 6 the control room. 7 A. It was -- the doors were just open on 8 the building. The windows were open. 9 There was a fan above the sink where the 10 samples were cooled and run. 11 Q. Was it a fan that was blowing in or 12 sucking air out? 13 A. Just an exhaust fan overhead. 14 Q. Do you know how, if at all, that exhaust 15 was treated? 16 A. No. 17 Q. Do you know where the exhaust went after 18 it was pulled out? 19 A. I've never thought anything about it. 20 Q. Okay. What was the process of taking 21 samples in the control room? How was 22 that done? 23 A. I don't understand your question.	Page 20 1 Q. Okay. And who analyzed these samples 2 once they had cooled? 3 A. The person that caught the sample. 4 Q. And what were you analyzing the samples 5 for? 6 A. Finished product like specific gravity. 7 Q. Okay. Anything else? 8 A. No. 9 Q. Consistency? 10 A. Well, that was the consistency. 11 Q. The specific gravity, is that what was 12 tested? 13 A. That was it. 14 Q. All right. Let's move around to when 15 you were a storeroom clerk in 1966 and 16 '67. Incidentally, why did you take the 17 job as a storeroom clerk after you were 18 an operator and before going to chief 19 operator? 20 A. I'll have to go into a little detail 21 here. 22 Q. All right. 23 A. With shift work you work around the

Page 21 1 clock, and storeroom was a daytime job. 2 Q. Was the storeroom clerk job in the 3 Aroclor department also? 4 A. No. It was a separate building. 5 Q. Okay. And let me start at the very 6 beginning. What's your birthday? 7 A. July 29th, 1937. 8 Q. So if I'm calculating right, you were 9 about twenty-nine years old when you 10 became storeroom clerk, and about a year 11 later you became a chief operator in the 12 biphenyl department? 13 A. I hope you understood that these dates 14 are estimates in my mind. 15 Q. I should have kept that in mind. 16 Storeroom clerk, just back there -- 17 A. Excuse me just a minute. 18 Q. Sure. Did you have any safety gear that 19 you had to wear as a storeroom clerk? 20 A. No. 21 Q. Did you ever travel outside of the 22 office where you performed your duties? 23 Did you go around the plant, for	Page 23 1 Q. Did you have any responsibility for the 2 implementation of safety measures for 3 the men under your charge? 4 A. The reason I'm taking so long, not -- 5 No, not generally, you wouldn't. 6 Q. Did you distribute gloves, face shields, 7 goggles, and others things to them? 8 A. No. 9 Q. Who did that? 10 A. Storeroom. 11 Q. Who was responsible for making sure they 12 had the proper materials, proper safety 13 gear? 14 A. The company. 15 Q. Did you have the responsibility for 16 punishing anybody for failing to wear 17 any of their safety materials? 18 A. No. 19 Q. Whose responsibility was that? Let's 20 say a guy didn't wear his hard hat one 21 day and there was a reprimand for that. 22 Who was responsible for handing out that 23 reprimand?
Page 22 1 example? 2 A. No. 3 Q. I'm sorry to jump around so much. But 4 back to when you were an operator, where 5 did you take your meals? 6 A. We had a lunchroom. 7 Q. Do you remember if there was a rule in 8 place regarding eating your meals 9 anywhere in the plant? 10 A. I don't know if it was a rule. We just 11 had a lunchroom. That is where you 12 went. 13 Q. All right. Let's move on to when you 14 became a chief operator in approximately 15 1967 to approximately 1977 in the 16 biphenyl department. What were your 17 responsibilities as chief operator? 18 A. Each shift had operators, and the chief 19 was sort of in charge of that particular 20 shift, that crew. 21 Q. Okay. And were you responsible for 22 hiring and firing? 23 A. No.	Page 24 1 A. Ever who saw it would just generally 2 remind him of it. 3 Q. Not a foreman or chief foreman or 4 supervisor or someone like that? 5 A. If it got bad enough, the foreman would 6 be. 7 Q. And who did you specifically report to 8 as chief operator? 9 A. The foreman. 10 Q. Do you remember his name? 11 A. Had several. 12 Q. Okay. 13 A. Barbara Curry, Mark Williams. That's 14 all I can think of right now. 15 Q. If you think of any more, just let me 16 know. 17 A. All right. 18 Q. Did you have any responsibility as chief 19 operator for sampling like you did as an 20 operator? 21 A. No. 22 Q. Did you have any responsibility for the 23 production process that went on outside,

Page 25 1 hands on? 2 A. Only if the operator had problems. 3 Q. Okay. Did you have any responsibility 4 like you did as an operator for cleaning 5 up spills? 6 A. Yes. 7 Q. And what were your responsibilities 8 there? 9 A. Just assist. 10 Q. Did you have any responsibilities as 11 chief operator for the disposal of the 12 waste material after a spill? 13 A. No. 14 Q. How was a spill reported up the chain? 15 MR. MYERS: At what point in time? 16 Q. As soon as the spill happens, what chain 17 of events takes place? 18 MR. MYERS: I guess the 19 clarification I have or want 20 is when he was an operator or 21 chief operator? 22 MR. COLEMAN: Good question. 23 Q. Either one. As an operator or chief	Page 27 1 sweeping down or any -- Just general 2 cleanup. It could be the building or 3 outside in the operation area, picking 4 up trash. 5 Q. Did you hose down any area of either the 6 control room or outside? In other 7 words, did you use hoses or water as a 8 part of housekeeping? 9 A. Yes. 10 Q. Do you know if there was any drain for 11 that water? 12 A. Yes. 13 Q. And where were the drains? 14 A. The storm drains. 15 Q. Okay. Is that outside that you are 16 talking about? 17 A. Yes. 18 Q. And do you know where those storm drains 19 went ultimately? 20 A. Not for sure. 21 Q. Has anyone ever told you where the storm 22 drains went? 23 A. I believe so.
Page 26 1 operator, and if they changed, if the 2 chain of command kind of changed when 3 you were an operator or chief operator, 4 let me know that. What would happen? 5 A. My responsibility as a chief operator 6 would be to report it to my foreman. 7 Q. And as chief operator did operators 8 report to you the occasional spills? 9 A. Yes. 10 Q. Okay. This may be a tough question to 11 answer, but was there any spill too 12 small to report? 13 MR. MYERS: Object to the form. 14 A. I don't know about that. 15 Q. Describe if you will your role as 16 operator and chief operator and the 17 housekeeping measures you had there at 18 the plant. 19 A. Housekeeping was very important. No job 20 was complete until your housekeeping was 21 done. 22 Q. And what housekeeping measures -- 23 A. It would be as far as washing down or	Page 28 1 Q. What did they tell you? 2 A. There was a catch basin inside the 3 fenced area. 4 Q. In what relation to the fenced area is 5 that catch basin? 6 A. Near the highway. 7 Q. Is that highway 202 you are talking 8 about? 9 A. What used to be -- I don't know what 10 that is now. It used to be Highway 202 11 for years. 12 Q. Do you have any knowledge of how that 13 basin was treated if at all? 14 A. No. 15 Q. Do you know anyone who had ultimate 16 responsibility for that basin? 17 A. Ask that again. 18 Q. Sure. Do you know anyone who had 19 responsibility for the materials in that 20 basin? 21 A. No. 22 Q. Now, the control room, is there a drain 23 in the control room?

1 A. No. There was -- We didn't use water.
 2 There was a drain, but it wasn't a
 3 wash-down area.
 4 Q. You talked about a sink earlier in the
 5 control room. What was the sink used
 6 for?
 7 A. Samples.
 8 Q. Okay. Was it an operating sink?
 9 A. No. It was just a lab type sink, just
 10 used just for that particular, you know,
 11 process.
 12 Q. And how were the samples cooled?
 13 A. Water.
 14 Q. Okay. Do you remember whether the
 15 samples containers were washed off.
 16 A. They are.
 17 Q. Do you know whether the sink's drain
 18 went to the basin?
 19 A. I don't know.
 20 Q. When you first joined Monsanto did you
 21 participate in a job interview?
 22 A. Yes.
 23 Q. Were you told in the job interview that

1 you would be working around Aroclors?
 2 A. No.
 3 Q. Were you told in the job interview that
 4 you would be working around PCBs?
 5 A. No.
 6 Q. Did you ever have an opportunity in your
 7 entire career at Monsanto to interview
 8 workers for positions?
 9 A. No.
 10 Q. Do you know if during the interview
 11 process -- Strike that.
 12 When you were an operator in 1961
 13 through '66, did you have safety
 14 meetings within the department?
 15 A. Yes.
 16 Q. Did you have meetings with the medical
 17 department?
 18 A. Some of them could have been.
 19 Q. Did you have meetings about your health
 20 with anyone at the plant management
 21 level?
 22 MR. MYERS: Same time period?
 23 MR. COLEMAN: Same time period.

1 A. Ask me again, please.
 2 Q. I'm sorry. It was very confusing. We
 3 talked about you said you had safety
 4 meetings. You said you may have had
 5 meetings with the medical department.
 6 Did you have any meetings specifically
 7 related to worker health?
 8 A. I can't remember.
 9 Q. Okay. For those meetings that you
 10 remember, the safety meetings and
 11 perhaps the ones that involved the
 12 medical department, the few that
 13 required the medical department's
 14 participation, what was discussed at
 15 those meetings? I know it was a long
 16 time ago. I just mean very generally.
 17 A. I'm sorry. I can't remember that.
 18 Q. Do you specifically remember the subject
 19 of the health effects of PCB exposure
 20 being brought up in any of the meetings?
 21 A. I don't remember.
 22 Q. Did anyone ever tell you that PCBs were
 23 dangerous?

1 A. I don't remember that.
 2 Q. Outside of wearing protective gear as a
 3 part of the general rules of the plant,
 4 were you ever provided any special
 5 protective gear when you were handling
 6 Aroclors or PCBs?
 7 MR. MYERS: Other than what he
 8 described earlier?
 9 MR. COLEMAN: Other than what he
 10 described earlier.
 11 Q. I will go through the list. You said
 12 you had gloves to the wrist, face
 13 shield, goggles, steel-toed boots, hard
 14 hat, safety glasses and work clothes
 15 that were laundered at the plant.
 16 Anything that was special say for a
 17 particular job?
 18 A. Now, you are talking about as an
 19 operator?
 20 Q. As an operator.
 21 A. I can't remember anything other than
 22 that.
 23 Q. How about respirators?

Page 33 1 A. I don't remember in that time period. 2 Q. Not the respirators with the full 3 canister, but how about the small paper 4 kind of respirator? Did you ever use 5 those? 6 MR. MYERS: Object to the form. 7 A. I don't remember any respirators at that 8 time. 9 Q. What were you told about -- Strike that. 10 Okay. When you were a chief 11 operator from 1967 to 1977, do you 12 remember any safety meetings? 13 A. Oh, yes. 14 Q. Were you in part responsible for putting 15 on those meetings? 16 A. No. 17 Q. How frequent would you say during that 18 period as a chief operator? 19 A. Monthly. 20 Q. Of the three types of meetings we talked 21 about, safety meetings, any meetings you 22 had with the medical department, any 23 meetings you had generally about	Page 35 1 through breathing? 2 MR. MYERS: Object to the form? 3 A. Again, ask me the question. 4 Q. Sure. Were you ever told about the 5 health effects on the human body from 6 breathing PCBs? 7 MR. MYERS: Same objection. 8 A. To my knowledge it was brought up in 9 safety meetings. 10 Q. Do you remember the extent of that? 11 A. No. 12 Q. Incidentally, do you remember in any of 13 these meetings someone was there taking 14 notes about the meeting? 15 A. Not to my knowledge. 16 Q. Like a secretary or clerk there to kind 17 of write down what people were saying? 18 A. No. 19 Q. So I take it you never read anything 20 after a meeting which reflected the 21 events that happened at the meeting? 22 A. I can't remember. 23 Q. Like minutes of the meeting, did you
Page 34 1 employee and worker health, I'm kind of 2 lumping all of those together. Are 3 those the kinds of meetings you would 4 have monthly? 5 A. Yes. 6 Q. And as a chief operator, do you remember 7 any discussion about the health risks 8 associated with PCB exposure? 9 A. I don't remember any. 10 Q. Okay. Do you remember any specific 11 instructions on how to handle PCBs or 12 Aroclors during your tenure as chief 13 operator? 14 A. I don't understand your question, 15 really. 16 Q. I'm sorry about that. Were you ever 17 told about the effects of handling 18 Aroclors without any protective gear? 19 MR. MYERS: Object to the form. 20 A. Not to my knowledge. 21 Q. Did you ever -- were you ever told or 22 did you ever learn of the effects of 23 PCBs on the body through absorption	Page 36 1 ever coming across those? 2 A. The words, you know, minutes of the 3 meeting comes to mind, but I can't tell 4 you. 5 Q. I take it you wouldn't remember the 6 specific contents of any meeting you 7 might -- 8 A. No. 9 Q. Were the minutes of the meetings posted 10 anywhere in the plant? 11 A. I can't remember. 12 Q. Do you remember being shown any MSDSs 13 for the particular products you worked 14 with? 15 A. Yes. 16 Q. While we are at it, would you mind 17 listing the specific Aroclor products 18 and any other PCB containing products 19 that you worked with during your tenure 20 at Monsanto? 21 A. 1140, 1142, 1240, 1242. I have a lot of 22 numbers in mind but can't get them all 23 together, 5460, late biphenyl, 1268

Page 37 1 1148, 1248. I'm sure there are a lot 2 more I can't remember. 3 Q. If you remember them any time during the 4 deposition, just let me know? 5 A. All right. 6 Q. I think you said in the next two 7 positions you held as maintenance 8 department mechanic from roughly 1977 to 9 '80 and as EI from '80 and until you 10 retired in '94 you weren't working 11 specifically in the biphenyl department; 12 is that correct? 13 A. That's correct. 14 Q. Let's talk about the health and safety 15 protocol at Monsanto during those years 16 and particularly as it related to your 17 jobs. Were you required to wear the 18 protective gear as a maintenance 19 department mechanic? 20 A. Yes. 21 Q. Besides that list we went through 22 earlier, were there any special 23 protective measures that you took?	Page 39 1 certainly as to time and the 2 term products, and he talked 3 about them being raw 4 materials in particular? 5 Q. Specifically Santowax, biphenyl, and 6 chlorine, I'm just trying to get a 7 sense of the structure of the plant. 8 Were they contained in tanks outside or 9 were they -- 10 A. Yes. 11 Q. Ever just in barrels? 12 A. No. 13 Q. In your responsibility as a maintenance 14 department mechanic and EI, did you have 15 any responsibilities for cleaning out 16 the tanks? 17 A. Yes. 18 Q. How did you accomplish that? 19 A. The tanks were usually emptied by the 20 production department. Let me go back a 21 minute. As far as cleaning out in 22 particular, tanks, I'd say no, because 23 the production department done their
Page 38 1 A. Gas mask, respirator. 2 Q. Why did you have to use a gas mask and 3 respirator? 4 A. Parathion department fumes. 5 Q. Did you ever have to use a gas mask or 6 respirator in the biphenyl department? 7 A. Yes. 8 Q. In what respect? 9 A. Around benzene. 10 Q. Was benzene one of the raw materials in 11 the production of Aroclors to your 12 knowledge? 13 A. I don't know how to answer that really. 14 It was a raw material to the biphenyl. 15 Q. And then biphenyl went in the Santowax? 16 A. Or it went into the Aroclor production. 17 Q. All right. Were you responsible -- 18 Strike that. 19 How was Santowax, biphenyl, 20 chlorine and other products -- were they 21 held in tanks? 22 MR. MYERS: Let me object to the 23 form. It is overly broad,	Page 40 1 cleaning. We worked on the tank, but we 2 didn't -- 3 Q. Did you ever climb in one, for example? 4 A. Yes. 5 Q. Were you using a respirator? 6 A. Yes. 7 Q. And why did you climb in it, for what 8 purpose? 9 A. It could have been a leak in the tank we 10 were hunting for, could have been adding 11 some equipment to the tank. 12 Q. Okay. And you say you wore a 13 respirator. Was it the canister type 14 respirator? 15 A. As far as protection, it would depend on 16 what product was in that tank before. 17 You may have fresh air supplied, maybe a 18 respirator, had a gas mask, just air. 19 Q. Okay. You answered my next six 20 questions. Once in the tank did you 21 ever have any responsibility for washing 22 it out with a hose? 23 A. No.

Page 41 1 Q. Do you know whether that job was ever 2 performed, the cleaning of tanks with 3 water? 4 A. Yes. 5 Q. And if you can answer this, how often 6 would you say, let's say when you were a 7 -- the entire time you were a 8 maintenance department mechanic from '77 9 to '94? 10 MR. MYERS: I believe he was in 11 maintenance '77 to '80 and 12 then an EI from '80 to '94. 13 MR. COLEMAN: Yes. 14 Q. Your best guess. 15 MR. MYERS: Let me just caution 16 you. Mr. Taylor, you are not 17 required to speculate or 18 guess. If you can give him a 19 reasonable estimate or tell 20 him with certainty or 21 reasonably certainty, do 22 that. But you are not 23 required to speculate or	Page 43 1 production? 2 A. Yes. 3 Q. And how was that handled? 4 A. According to the product, you could 5 sweep it out, collect it in drums, or 6 you could -- some tanks may have been 7 washed out. 8 Q. Let's start with -- Those are three 9 common methods. Let's start with the 10 first. What was the product if you 11 remember that you were sweeping out? 12 A. In these time periods, it could have 13 been any product because -- 14 Q. Any of the list we went through earlier? 15 A. Yeah. It could have been not 16 necessarily those products but could 17 have been raw material products. 18 Q. What did you do with what you had swept 19 out once it was over? 20 A. Again, it went in drums. From there, 21 the shipping department would take care 22 of it. 23 Q. But you had responsibility for putting
Page 42 1 guess. 2 MR. COLEMAN: Thanks. I agree. 3 A. No specific times or numbers or anything 4 like that. 5 Q. Okay. Did you have any responsibility 6 when you were either an operator or 7 chief operator for climbing into tanks 8 and doing any type of maintenance? 9 A. You caught me here on the spot. 10 THE WITNESS: Can I ask you a 11 question? 12 MR. MYERS: Yeah. Let's take a 13 short break. 14 (A break was taken.) 15 MR. COLEMAN: Can you read back 16 the last question? 17 (Requested portion of record 18 read.) 19 A. Maintenance and production were separate 20 departments. As production, we didn't 21 do any maintenance on them. 22 Q. How about cleaning up? Did you ever 23 crawl into a tank to clean it up in	Page 44 1 it on a pallet? 2 A. Right. 3 Q. And that was about it? 4 A. Yes. 5 Q. What about when you washed out the 6 tanks? What was the process there? 7 A. Well, the water was pumped out. I was 8 trying to remember. I don't remember 9 where it was pumped to. The final part 10 of the water was mopped up with, like, 11 rags or something like this to get 12 everything dry. They were put in drums. 13 Q. Okay. 14 A. That's to the best of my knowledge. 15 Q. Do you remember whether the waste water 16 after that washing was drummed or not? 17 A. To my knowledge sometimes it was. 18 Q. And if it was, did you have 19 responsibility for putting that barrel 20 on a pallet? 21 A. Yes. 22 Q. And in the other times when it wasn't, 23 what happened to that waste water?

Page 45 1 A. I don't remember. That is what I'm -- 2 I'm trying to remember. 3 Q. Okay. Do you have any personal 4 knowledge of any tests done on animals 5 for PCB exposure? 6 A. No. 7 Q. Do you have any personal knowledge of 8 soil samples taken for analysis for 9 PCBs? 10 MR. MYERS: Object to the form. 11 Where, when? 12 Q. In your tenure at Monsanto, anywhere 13 around the plant. 14 A. Not to my knowledge. 15 Q. Do you have any knowledge of -- during 16 your time at Monsanto and after, do you 17 have any knowledge of soil samples taken 18 in the Anniston area by anyone at all 19 for analysis for PCBs? 20 A. What I read in the paper. 21 Q. Any other sources of information besides 22 the paper? 23 A. No.	Page 47 1 for and what the results were? 2 A. No. 3 Q. Do you remember ever being told or it 4 being put on the bulletin board there in 5 the Aroclor department the results of 6 what the tests were on that basin? 7 A. Not to my knowledge. 8 Q. Okay. Do you know where Snow Creek is? 9 A. Yes. 10 Q. Do you know whether any effluents were 11 ever discharged into Snow Creek? 12 MR. MYERS: Object to the form. 13 From where? 14 Q. From the plant. 15 A. I have been told that. 16 Q. Who told you that? 17 A. You know, just talk, no specific -- 18 particular name. I don't remember. 19 Q. When you say that, do you mean -- Did 20 this come up during your employment at 21 Monsanto? 22 A. Go back and ask me that question again. 23 Q. Sure. You said you don't remember
Page 46 1 Q. And what do you know about -- from your 2 reading of the paper, what do you know 3 about the results of those soil samples? 4 A. Results, I really don't know anything. 5 Q. Okay. Do you remember reading that the 6 soil samples had levels of PCBs? 7 MR. MYERS: Object to the form. 8 A. Yes. 9 Q. Were you aware of, at any time when you 10 were working at Monsanto, any tests done 11 on water around the plant for the 12 presence of PCBs? 13 A. Not for PCBs in particular. 14 Q. Okay. But for other -- 15 A. Water samples were taken. 16 Q. For what tests if you can remember? 17 A. The laboratory done this. I have no 18 idea. 19 Q. Do you remember whether any tests were 20 done on that basin we talked about 21 earlier? 22 A. Yes. 23 Q. And do you know what those tests were	Page 48 1 exactly the person that told you there 2 may be some effluent being discharged 3 into Snow Creek, that it was just talk. 4 Did that talk happen while you were an 5 employee at Monsanto, or is that 6 something you learned after you left 7 there? 8 A. When you talk about effluents, is that 9 like the storm sewer drain? That is 10 what I was -- Yes, that was during my 11 employment. 12 Q. Was that the subject of any of those 13 meetings we talked about earlier, health 14 meetings, safety department meetings, 15 safety meetings? 16 A. I can't remember. 17 Q. Okay. Do you have any knowledge of any 18 tests being done on fish for the 19 presence of PCBs? 20 MR. MYERS: Object to the form. 21 A. What I read in the paper. 22 Q. Have you seen the fish advisories around 23 Choccolocco Creek and Lake Logan Martin,

Page 49 1 the Coosa River? 2 A. Not with my eyes. 3 Q. Have you read them in the paper? 4 A. Yes. 5 Q. I think you said earlier you didn't have 6 any responsibility for the disposing of 7 wastes into landfills during your work 8 there. Is that correct? You said the 9 shipping department usually handled 10 that? 11 A. Yes. That wasn't in my department. 12 Q. Did you ever hear of any tests being 13 performed around the landfill for the 14 presence of PCBs? 15 A. I don't know what the tests were for. 16 Q. Were you aware of tests? 17 A. Tests were performed. 18 Q. Are you aware of any epidemiological 19 studies on humans for the effects of 20 PCBs? 21 MR. MYERS: Object to the form, 22 your definition of 23 epidemiology.	Page 51 1 read that? 2 MR. MYERS: Object to the form, 3 and ask for a clarification. 4 Are you referencing the 5 period of time of his 6 employment? 7 MR. COLEMAN: No. Just asking if 8 he has ever heard that. 9 MR. MYERS: Object to the form. 10 A. I don't believe I've ever heard that. 11 Q. Have you ever read or heard that 12 repeated bodily contact with the liquid 13 Aroclors may lead to an acne form of 14 skin eruption? 15 MR. MYERS: Same objection. 16 A. Not to my knowledge. 17 Q. Okay. Have you ever read or heard that 18 a serous and disfiguring dermatitis may 19 result when PCBs or Aroclors are allowed 20 to remain in contact with the skin? 21 MR. MYERS: Same objection. 22 A. Not to my knowledge. 23 Q. Have you ever read or heard or been told
Page 50 1 A. Ask me again, please. 2 Q. Sure. Are you aware of any tests done 3 or any studies made on the -- with 4 regard to PCBs in humans? 5 A. Yes. 6 Q. Do you remember what those tests 7 revealed? 8 A. They give a number as far as PCBs, but I 9 don't know what it meant. 10 Q. We'll get back to that in a little 11 while. Did you have any responsibility 12 with regard to -- Strike that. Never 13 mind. 14 I'm going to read you a couple of 15 things and ask you if you ever heard 16 this or if anyone ever told you these 17 things. Just tell me if you have and in 18 what context. Experimental work in 19 animals shows that prolonged exposure to 20 Aroclor vapors evolved at high 21 temperatures or by repeated oral 22 ingestion will lead to systemic toxic 23 effects. Has anyone -- Have you ever	Page 52 1 by anyone that exposures to PCBs at some 2 level may result in liver or kidney 3 damage? 4 MR. MYERS: Same objection. 5 A. Just what I read in the paper. 6 Q. Have you ever read or heard that PCBs -- 7 Strike that. 8 Have you ever read or heard that 9 exposure to PCBs can cause -- can cause 10 any disfigurement in animals like fish? 11 MR. MYERS: Object to the form. 12 A. Just what I read in the paper, again. 13 Q. And what did the paper say about that? 14 A. Just read about the fish. That is all I 15 can, you know -- 16 Q. What particularly did the paper say 17 about disfigurement in fish? 18 A. I can't remember. You know, I just read 19 general things about it. 20 Q. Okay. That's fine. Have you ever read, 21 heard, or been told this statement: The 22 amounts of PCBs being found in the 23 environment are not considered a danger

Page 53 1 to humans or fish; the whole question on 2 chlorinated pesticides relates to birds? 3 MR. MYERS: Object to the form. 4 A. Read it again, please. 5 Q. Have you ever read or heard or been told 6 this statement: The amounts of PCBs 7 being found in the environment are not 8 considered a danger to humans or fish; 9 the whole question on chlorinated 10 pesticides relates to birds? 11 MR. MYERS: Same objection. 12 A. I can't say yes, that I have heard it 13 just for birds. 14 Q. Okay. What do you know about birds and 15 PCB exposure? 16 A. I don't know anything. 17 Q. Okay. Have you ever heard of Dr. Renate 18 Kimbrough? Does that name sound 19 familiar? 20 A. Not to me. 21 Q. What if any contact did you have with 22 the Krummrich plant during your entire 23 tenure?	Page 55 1 A. I read it in the paper. 2 MR. COLEMAN: Give me just a 3 minute, guys. 4 (Discussion held off record.) 5 Q. With regard to the Krummrich plant we 6 were just talking about, do you have any 7 knowledge of whether the Krummrich plant 8 sent any PCBs to be incinerated in 9 Anniston? 10 A. Not to my knowledge. 11 Q. Did you have any role in your tenure at 12 Monsanto with regards to incineration? 13 A. Yes. 14 Q. What was your job then? 15 A. The word "incineration" -- 16 THE WITNESS: Can I ask you 17 another question? 18 (Discussion held off record.) 19 A. Incineration? 20 Q. Yes. 21 A. There was fuel put into the boiler. 22 This was a type of incineration, I 23 assume. It was -- That is the way it
Page 54 1 A. No contact. 2 Q. Did you ever meet anyone from Krummrich? 3 A. Yes. I have had people that visited 4 from that plant. 5 Q. Did they ever talk to you about their 6 plant operation? 7 A. No. 8 Q. Did they ever talk to you about PCBs? 9 A. No. 10 Q. Did you ever hear about the study that 11 was performed in the '70s on Krummrich 12 employees for exposure to PCBs? 13 MR. MYERS: Object to the form, 14 particularly to the 15 definition or the statement 16 that this was a study. 17 A. I'm not aware of it. 18 Q. Have you ever read, heard, or has anyone 19 ever told you the following statement: 20 Polychlorinated biphenyl in Inerteen can 21 have permanent effects on the human 22 body? 23 MR. MYERS: Object to the form.	Page 56 1 was put in there. 2 Q. I'll try to be more specific. Did you 3 have any involvement with -- Strike 4 that. 5 How many incinerators were at the 6 Anniston plant that you know about 7 during your career there used for the 8 incineration of waste material? 9 A. I say three that I know of. 10 Q. Was one specifically designated for the 11 biphenyl department or the Aroclor 12 department where you worked? 13 A. Only the boiler. This was the biphenyl 14 department. 15 Q. The biphenyl department, there was a 16 boiler but not an incinerator for waste 17 material? 18 MR. MYERS: I think the confusion, 19 Harrison, if there is any, is 20 that on one hand you are 21 talking about incineration, 22 and then you are talking 23 about a device called an

Page 57 1 incinerator. That is where I 2 think there is a disconnect. 3 A. I can't remember just for the Aroclor 4 department. 5 Q. Do you know if waste material from your 6 department was incinerated? 7 A. I'm trying to think. I'm going to say 8 yes, in fuel. 9 Q. But you never had any responsibilities 10 for manning that incinerator? 11 A. The boiler, I did. 12 Q. Okay. Just in my own mind, I need to 13 get this right. What was the boiler 14 used for? 15 A. To produce steam for the plant. 16 Q. What I'm referring to is an incinerator 17 that is used to destroy waste material, 18 a burner. 19 A. Not that I can remember for the Aroclor 20 biphenyl departments, not an incinerator 21 for that department. 22 Q. All right. You testified earlier that 23 sometimes you swept out a tank and the	Page 59 1 A. I'm sorry. I just can't remember. 2 Q. We're talking about during your time as 3 an operator from 1961 to 1966 through 4 the time you were a chief operator from 5 '71 to '77; is that correct? 6 MR. MYERS: Is that the question 7 now, because the earlier 8 incineration was during his 9 tenure. 10 A. Come back and tell me again. 11 Q. Do you remember specifically during your 12 time in the Aroclor department as an 13 operator or chief operator using 14 products as fuel for the boiler? 15 A. No, no. 16 Q. When were products used for the boiler? 17 A. When I was electrician we were 18 responsible for the boiler. That's when 19 they -- the boiler I believe started 20 using -- to my knowledge, they started 21 using this other product as a fuel. 22 Q. Do you remember any products that you 23 know were PCB containing products used
Page 58 1 material was put in barrels and then you 2 put it on a crate and sometimes the 3 waste water was put into -- was 4 sometimes put into a barrel. I just 5 wanted to know if any waste material in 6 your department during your tenure at 7 Monsanto was to your knowledge taken to 8 an incinerator like I described. 9 MR. MYERS: Waste material that 10 you just defined or gave 11 examples of? 12 Q. I'm saying waste materials of any type 13 in your department. 14 A. I don't remember being incinerated, no. 15 Q. The boiler that you talked about, was it 16 used to incinerate -- was that the fuel 17 for the -- Sorry. 18 What was the fuel for the boiler? 19 A. I don't remember -- It was natural gas. 20 Q. Okay. 21 A. And then they took a mixture of products 22 and put it in there as a fuel. 23 Q. Okay. What products?	Page 60 1 as fuel for the boiler? 2 A. We keep saying PCBs. When I was -- All 3 the time I was in the plant, this was a 4 word we never heard used. It was 5 Aroclor and biphenyl. PCB just wasn't a 6 word for us. 7 Q. Thanks for clarifying that. If you want 8 I will go through the list of Aroclors 9 you mentioned earlier. I'm talking 10 about this list of products you said you 11 worked on and whether those products 12 were used as fuel for the boiler. 13 A. Back then, no. We weren't using the 14 products as a fuel. 15 Now, if I can back up a minute, 16 you asked me a question. One of the 17 products that was used as fuel was 18 Montar, which is an off-gas that is not 19 PCB. 20 Q. Okay. During your time at Monsanto the 21 entire time you were there, do you 22 remember any explosions or ruptures in 23 the lines that might have caused an

Page 61 1 escape of products into the atmosphere? 2 MR. MYERS: Object to the form. 3 A. Products? 4 Q. Any products. Do you remember any 5 explosions? 6 A. Yes. 7 Q. Do you remember when? 8 A. Date, no. 9 Q. Do you remember what job was were doing 10 at the time? 11 A. It was when I was in maintenance. 12 Q. Okay. 13 A. Parathion department. 14 Q. How about any time you were an operator 15 or chief operator? 16 A. Yes. 17 Q. Do you remember what happened? 18 A. The main thing I can remember is in the 19 wintertime your Montar line was -- would 20 freeze up. And when it would heat up, 21 the gasket would give out. 22 Q. And that would cause a rupture? 23 A. Yes. It became a solid as soon as it	Page 63 1 talking about what the value 2 was. 3 MR. COLEMAN: I'm sorry. Thank 4 you for clearing that up. 5 Q. You say was somewhere in the sixties? 6 A. That was the number. 7 Q. When did you take your test? 8 A. I don't remember. I'm sorry. I can see 9 where that can be confusing. 10 Q. Has anyone in your family had their 11 blood tested for PCBs? 12 A. No. 13 Q. Have you ever been diagnosed with 14 cancer? 15 A. No. 16 Q. Anyone in your immediate family? 17 A. No. 18 Q. Have you ever been diagnosed with liver 19 damage? 20 A. You say immediate family, are you 21 talking about my wife or children? 22 Q. Yes. 23 A. No.
Page 62 1 hit the air. 2 Q. Any other ruptures or explosions? 3 MR. MYERS: While he was in 4 Aroclor? 5 MR. COLEMAN: Yes. 6 A. It has been so long, I can't remember. 7 Q. Fair enough. Do you -- Have you ever 8 had your blood tested for the presence 9 of PCBs? 10 A. Yes. 11 Q. Do you know what your level is? 12 A. It has been a number of years ago. I 13 think it was in the sixties. 14 Q. Was that performed on site? 15 A. I went to the doctor's office, the 16 company doctor. 17 Q. And you don't know the date? 18 A. No. 19 Q. But you think it was in the '60s? 20 A. No. It was later than that, much later. 21 MR. MYERS: No, no. I think -- 22 Somebody is talking about 23 dates, and somebody is	Page 64 1 What was the other question? 2 Q. Have you ever been diagnosed with liver 3 damage or liver problems? 4 A. No. I'm in good health as far as I 5 know. 6 Q. Are you on a pension? 7 A. Yes. 8 Q. And benefits, does that include benefits 9 too? 10 A. Yes. 11 Q. Do you have any family working at 12 Monsanto? 13 A. No. 14 Q. Do you keep in contact with any friends 15 that are presently working at Monsanto? 16 A. Yes. 17 Q. And who are they? 18 A. Brian Thrasher. You did say contact? 19 Q. Just, you know, friends that are 20 currently working at Monsanto. 21 A. I'd say the plant manager, I have 22 contacted with him, you know. Most is 23 just in passing contact.

Page 65 1 Q. Did you speak to anyone from Monsanto 2 prior to this deposition? 3 A. I was contacted by Jerry Brown 4 concerning this. 5 Q. What did you talk about? 6 A. He wanted to know when it was convenient 7 for me to come in, told me Mr. Kelly 8 would call me and make arrangements. 9 Q. Did he tell you about what he thought 10 you would be testifying about? 11 A. No. 12 Q. Give you any pointers? 13 A. No. 14 Q. Did you ask for any? 15 A. No. 16 Q. Okay. Do you know -- You said earlier 17 that Montars do not contain PCBs. Is 18 that right? 19 A. PCBs as you are saying is 20 polychlorinated biphenyls? 21 Q. Correct. 22 A. So this is a product before it went into 23 the chlorinator. It is a biphenyl	Page 67 1 Q. Yes. That might be wrong here. What 2 job was performed by laborers with 3 regard to still bottoms? 4 A. They were put in metal drums, 5 containers, cooled and placed on 6 pallets. 7 Q. Did you have any responsibility for 8 placing them on pallets? 9 A. No. 10 Q. That was a laborer job also? 11 A. Yes. 12 Q. Do you have any idea where those drums 13 went? 14 A. No, I don't. 15 Q. This I think is going to be the last 16 question. Did the boiler that we talked 17 about earlier, did it have a scrubber? 18 A. I can't recall. 19 MR. COLEMAN: All right, sir. 20 (The deposition concluded at 21 12:50 p.m.) 22 23
Page 66 1 product. 2 Q. Montar is a biphenyl product? 3 A. Right. 4 Q. What are still bottoms? 5 A. That is after the product was produced 6 and went into a still. They still the 7 product off, and what was left in there 8 is called still bottoms. 9 Q. And did you have any responsibility in 10 your entire tenure at Monsanto for 11 cleaning up still bottoms? 12 A. No. The labor department did this. In 13 that day we had what is called laborers. 14 Q. You said in that day. What time period 15 are you talking about here? 16 A. When I was an operator. 17 Q. So '61 to '66? 18 A. Yes. 19 Q. And did you ever witness these laborers 20 cleaning up these still bottoms? 21 A. Yes. 22 Q. How was that job performed? 23 A. Did you say cleaning up?	Page 68 1 I do hereby certify that the witness 2 whose attached deposition was taken before me 3 was by me first duly cautioned and sworn to 4 tell nothing but the truth in the cause 5 aforesaid; that the testimony contained herein 6 was by me reduced to writing in the presence 7 of said witnesses by means of stenography and 8 afterwards transcribed by means of computer 9 aided transcription. The foregoing is a true 10 and accurate transcript of the whole of the 11 testimony given by said witness, as aforesaid. 12 I do further certify that I am not 13 connected by blood or marriage with any of the 14 parties or their attorneys or agents and that 15 I am not an employee of any of them, nor 16 interested in the matter of controversy. 17 IN WITNESS WHEREOF, I have hereunto set 18 my hand and affixed my notarial seal at 19 Gadsden, Alabama, County of Etowah, this 6th 20 day of January 2002. 21 22 Deborah Salers Garrett 23 Certified Shorthand Reporter Registered Professional Reporter Notary Public, Alabama-at-Large My Commission expires: 3-6-05

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