June 24, 1988

Longoria & Goldstine
Court Reporting Service
176 West Adams Street
Suite 2232
Chicago, Illinois 60603

Re: City of Bloomington v. Westinghouse Electric Corp.
S.D. Ind. No. IP 83-9-C

Dear Sirs:

I have reviewed the transcript of my deposition, taken on June 25-26, October 15-16, and November 25, 1986, and wish to make the following changes to correct errors in transcription or errors in my testimony:

June 25, 1986

| Page | Line | |
|---|---|---|
| 11 | 10 | "1977" should be "1976" |
| 20<br>22 | 4<br>15 | "Lyon" should be "Lion" |
| 59 | 9 | "Benignus" should be "Bergen" |
| 87 | 12 | "Live" should be "Life" |
| 104 | 16,17 | "L 306" should be "PL 306" |
| 111 | 2 | "An examination" should be "a contamination" |
| 119 | 12 | Delete "But not --." Should read "Yes. The sloppiness ...." |

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|---|---|---|
| 135 | 8 | "Medical research" should be "Analytical chemistry research" |
| 145 | 16 | Add "Except it was sent to Findett, not to Monsanto." |
| 202 | 19 | Answer should read: "That was my understanding then. My understanding now is that dioxins are not generated from burning PCBs." |
| 205 | 23 | I understood the question to refer to Monsanto, not Westinghouse. |
| 212 | 19 | Answer should read: "That is one facet of control exercisable by a person who has the scrap." (This clarifies my understanding ambiguous reference to "you" in line 16 of the question.) |
| 215 | 22 | Answer should read: "Yes. Monsanto felt no one could control the end product disposal." (This clarifies my understanding of the ambiguous words "you" in line 17 of the question.) |
| 216 | 9 | Add to answer "This was because users could not control usage and insure against escape to the environment." (This clarifies my understanding of the ambiguous word "you" in line 3 of the question.) |
| 217 | 16 | Answer should read: "Yes, Monsanto continued sales if users could capture and recycle, destroy, or store the waste and no acceptable alternative was available. That is important." (This clarifies my understanding of the ambiguous word "you" in line 11 of the question.) |
| 218 | 1 | Answer should read: "That's right. Monsanto would continue sales only where users could recover the waste for processing, destruction, or proper landfilling." (This clarifies my understanding of the ambiguous word "you" in line 20 of the question.) |
| 228 | 11 | "garage" should be "garbage" |
| 269 | 11 | Answer should read: "Right. Monsanto continued selling to certain applications where users could control the release of |

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|---|---|---|
| | | PCBs into the environment." (This clarifies my understanding of the ambiguous "you" in line 5 of the question.) |
| 276 | 24 | Answer should read: "No. I could only tell if it was releasing more ...." |
| 282 | 13 | Should read: "low parts per million would not concern me." |

June 26, 1986

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|---|---|---|
| 330 | 2 | "move" should be "more" |
| 347 | 24 | "degrees had" should be "degreased" |

October 15, 1986

| | | |
|---|---|---|
| 498 | 6 | "dioxin, furans, yes" should be "PCQs and furans." |
| 498 | 12 | Should read: "This is one source for furans under certain conditions." |
| 499 | 13 | delete "dioxins and" |
| 513 | 14 | "years" should be "weeks" |
| 516 | 20 | "Rahl" should be "Rall" |
| 525<br>526 | 7 to<br>13 | This testimony was erroneous as to auditing of PCB testing and was corrected at pages 874 - 877. |
| 533 | 5 | "Whitman" should be "Widmark" |
| 549 | 6 | "Q" should be "A" (This line is part of the question, not my answer.) |

October 16, 1986

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|---|---|---|
| 627 | 16 | Should read: "I never heard of 'Donovon' Gordon. I heard of 'Don' Gordon." |
| 657 | 2 | Should read: "I didn't use it prior to Mr. Mason's presentation." |
| 684 | 4 | "layers" should be "lawyers" |

| | | |
|---|---|---|
| 700 | 19 | Should read "All those recommendations except, perhaps, incineration. It is a ..." |
| 773<br>775 | 9 to<br>22 | This testimony was erroneous as to auditing of PCB testing and was corrected at pages 874-77 |
| 816 | 22 | "And" should be "In" |

November 25, 1986

| | | |
|---|---|---|
| 909 | 4 | "participant" should be "participate" |
| 1029 | 11 | Answer should be "1970 or 1971." Reason for correction: Subsequent to the deposition I have discovered that the report of low ppb levels in effluent, the timing of which I could not remember (page 1031, lines 21-23), was dated May 7, 1971 (Dep. Ex. 144). Therefore, my testimony that dissatisfaction extended beyond that date was in error. |
| 1042 | 5 | Answer should be "No. By the time Mr. Corey became my supervisor I had already received the low ppb effluent analysis from Bloomington to which I previously referred." See explanation above. |
| 1042 | 8, 12, 15 | These answers are incorrect and the questions are inapplicable due to my error in the previous answer at line 5. |
| 1048 | 16 | "industry -- that Monsanto replacements" should be "the industry notified Monsanto that replacements" |

I am signing the signature page of the transcript on the assumption that the changes above will be made.

Thank you for your assistance.

Very truly yours,

William B Papageorge

William B. Papageorge

9080j

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

THE CITY OF BLOOMINGTON, INDIANA; THE UTILITIES SERVICE BOARD OF BLOOMINGTON, INDIANA; and MONROE COUNTY, INDIANA,

Plaintiffs,

vs.

WESTINGHOUSE ELECTRIC CORPORATION, a Pennsylvania corporation; and MONSANTO COMPANY, a Delaware corporation,

Defendants.

Civ No. IP 83-9-C

I hereby certify that I have read the foregoing transcript of my deposition given at the time and place aforesaid, consisting of Pages 1 through 1060 inclusive, and I do again subscribe and make oath that the same is a true, correct and complete transcript of my deposition so given as aforesaid, as it now appears.*

William B Papageorge
WILLIAM B. PAPAGEORGE

SUBSCRIBED AND SWORN TO before me this 24th day of June, 1988.

Josephine S. Niblock
NOTARY PUBLIC

JOSEPHINE S. NIBLOCK
Notary Public - State of Missouri
St. Louis County
My Commission Expires January 15, 1991

* with corrections in my letter dated June 24, 1988.



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