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SUMMARY OF THE DEPOSITION

OF

BERNARD GREGORY CAMBRA

Bernard Gregory Cambra is a resident of 20 Shawmut Avenue in New Bedford, having resided there for thirty years (p. 6 line 17). Mr. Cambra has lived in New Bedford since he was two years of age (p. 7 line 9). In World War II, Mr. Cambra was a Hospital Corpsman, attached to the United States Marines, and served with the Marines, both in World War II and the Korean War (p. 9). He is the laboratory supervisor for the New Bedford Health Department (p. 7 line 12). Mr. Cambra has worked for the New Bedford Health Department for thirty-six years and has been the supervisor for the laboratory of the Health Department for approximately twenty-one years (p. 7). Prior thereto, he was chief of a clinical laboratory and, before that, worked in a laboratory at the Truesdale Hospital in Fall River (p. 8).

Mr. Cambra, who was brought up in the North End of New Bedford, is not aware of the inner harbor's ever being used as a swimming location; and he is not aware of its being used as a fishing location (p. 16). Mr. Cambra was brought up a few hundred yards from the river; and he never saw anybody shellfishing in the harbor inside the area of the hurricane dike, nor has he seen anybody bathing in the area (p. 18).

As part of his duties, Mr. Cambra is the individual who recommends closure of the beaches in New Bedford; and he is not aware of any beach being closed for any reason other than the presence of coliform (pp. 15-16).

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA *
Plaintiff *
-VS- *
AVX CORPORATION, ET AL * Civil Action
Defendants * No. 83-3882-Y
and * (Consolidated)
COMMONWEALTH OF MASSACHUSETTS *
Plaintiff *
-VS- *
AVX CORPORATION, ET AL *
Defendants *

DEPOSITION of BERNARD GREGORY CAMBRA, a witness of lawful age, taken on behalf of the Defendants in the above-entitled cause wherein the United States of America and the Commonwealth of Massachusetts are the Plaintiff, and AVX Corporation, et als, are the Defendants, pending in the District Court of the United States for the District of Massachusetts, pursuant to Notice and agreement of parties before Raymond Goudreau, a Notary Public in and for the Commonwealth of Massachusetts, at the Offices of Ropes and Gray, 225 Franklin Street, Boston, Massachusetts, 02740, on Wednesday, the 28th day of May, 1986, at 2:44 p.m.

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Represents the City of New Bedford.

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I N D E X

<u>Deposition of:</u>	<u>Direct</u>	<u>Cross</u>
Bernard Gregory Cambra		
(By Mr. McLaughlin)	6	
(By Ms. Maul)		21
(By Mr. Centola)		21
(By Mr. Culbert)		28

E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>Page</u>
15	Group of documents	26
16	File containing documents	27

(May 28, 1986
Wednesday, 2:44 p.m.)

STIPULATIONS

It is stipulated and agreed by and between counsel for the respective parties that the reading and signing of the deposition are hereby waived.

It is further stipulated and agreed by and between counsel for the respective parties that the sealing and filing of the deposition are hereby waived.

BERNARD GREGORY CAMBRA, a witness called on behalf of the Defendants, having been duly sworn on oath deposes and says as follows:

DIRECT EXAMINATION

Q (By Mr. McLaughlin) Would you please tell us your name?

A My name is Bernard Gregory Cambra.

Q And where do you live, Mr. Cambra?

A I live at 20 Shawmut Avenue in New Bedford.

Q How long have you lived there, Mr. Cambra?

A Thirty years.

Q Where did you live before that?

A I lived at 153 Whitman Street.

Q In New Bedford?

A In New Bedford.

Q And how long did you live on Whitman Street?

1 A I would say perhaps four or five years anyway at that
2 address and prior to that at 129 Whitman Street for
3 perhaps another four or five years and prior to that
4 at 535 North Front Street, that is all in the same
5 neighborhood of the North End, I lived at.

6 Q That is where you were born and brought up?

7 A I was born in Dartmouth.

8 Q And you moved to New Bedford at what age?

9 A Well, from what they tell me, I guess I was two years
10 of age.

11 Q What do you do for a living, Mr. Cambra?

12 A I am a laboratory supervisor for the New Bedford
13 Health Department.

14 Q How long have you been a laboratory supervisor for the
15 Health Department?

16 A I have been with the Health Department for 36 years.

17 Q Have you been supervisor for that whole time?

18 A Perhaps 21 years.

19 Q You have been the supervisor for the laboratory at
20 the Health Department for the City of New Bedford for
21 21 years?

22 A Yes.

23 Q Approximately?

24 A Approximately.

1 Q And before that you worked in the laboratory for about
2 15 years?

3 A I was with the Health Department laboratory since 1950.
4 I was a laboratory technician at that time. Prior to
5 that, I was the chief of laboratory for the clinical
6 laboratory at 261 Union Street.

7 Q What clinical laboratory was that?

8 A Burt.

9 Q Was that a private clinical --

10 THE WITNESS: That was a private
11 clinical laboratory.

12 Q How long were you at that private laboratory?

13 A I was there for two years.

14 Q And what did you do before that?

15 A Before that I worked at the Truesdale Hospital in
16 Fall River.

17 Q In the laboratory?

18 A In the laboratory.

19 Q How long were you over at the Truesdale Hospital?

20 A Well, to the best of my recollection, maybe six to
21 eight months, but then they came after me to take over
22 in New Bedford.

23 Q And prior to the Truesdale Clinic, where did you work?

24 A Prior to the Truesdale, that was the laboratory

1 internship at the St. Luke's Hospital for six months.

2 Q And before that?

3 A Before that I was at the Gradwohl School of Laboratory
4 and X-ray Techniques in St. Louis, Missouri.

5 Q You lived in New Bedford or the New Bedford area
6 except for the time you were at St. Louis going to
7 school?

8 A That's correct. Outside of being in the Naval service.

9 Q When were you in the Navy?

10 A I was in the Navy in World War II and also the Korean
11 War. In World War II, I was Hospital Corpsman, First
12 Class and I was with the Pacific fleet, amphibious
13 fleet for three years and during the Korean War, I was
14 at the marine base at Mentone, California. I had a
15 variety of duties as lab director and also pharmacist,
16 they assigned me at the time.

17 Q What is the highest rank you achieved in the United
18 States Navy?

19 A Hospital Corpsman, First Class. I was up for Chief
20 but I wanted out.

21 Q Mr. Cambra, what did you do in preparation for your
22 testimony today?

23 A Well, under short notice I went to the files and pulled
24 out everything I had on PCBs and sort of pulled as much

1 as I could and that is it.

2 Q Disregarding any conversation you may have had with
3 Mr. Connolly, did you have any conversations with any
4 other party regarding your testimony today?

5 A Well, I met with Mr. Brad Bourque and with Mr. Calnen
6 but that was all we talked about was one of the
7 studies, the compilation of the EPA given as a
8 background of the PCBs but that was it. Outside of
9 planning of how we are going to get here and what
10 time we were going to be coming and who was going to
11 drive and that type of thing.

12 Q You brought certain documents with you?

13 A These are primarily communications, third-party and
14 some of them more directly come to the Health
15 Department concerning the harbor.

16 Q Are these the documents? (Indicating.)

17 A Yes. There are some newspaper clippings there. Some
18 of this material is only publications that deal with
19 some of the PCBs. These are departmental documentations.

20 Q Sir, what oral communications have you had, if any,
21 with employees of the United States Government with
22 respect to the contamination or alleged contamination
23 of the New Bedford Harbor?

24 A Oral?

1 Q Yes.

2 A None.

3 Q None?

4 A No.

5 Q Any with the Commonwealth of Massachusetts?

6 A No.

7 Q Have you had any such communications with any persons
8 who was either a contractor or employee of the
9 contractor with either the Federal government or
10 State government?

11 A No.

12 Q Are you aware of anybody who works in your laboratory
13 having had any such communications?

14 A No.

15 Q Or in the Health Department generally?

16 A No.

17 Q What communications have you had directly orally with
18 any industry member who were allegedly discharging
19 pollutants in the New Bedford Harbor?

20 A The only time I can recall we had a meeting with John
21 Markey in the Mayor's office in New Bedford at one
22 time and representatives of Cornell-Dubilier were there
23 and that discussion orally concerned the capsulation
24 of waste down at the land fill and that had to do with

1 building a casket of cement and putting a cap on it
2 as one alternative of getting rid of the waste and
3 holding it until some treatable formula came up for
4 PCBs.

5 That was just one of the theoretical
6 approaches and that was about the only oral
7 communications we had.

8 Q When did that occur?

9 A That would have been about 1976, somewhere in that
10 vicinity.

11 Q Did you see Paragraph No. 12 of Exhibit No. 1?

12 A I saw that after, you know, I read it really briefly
13 at the time. I don't think the material I have
14 pertains to real estate assessment of that nature so
15 I don't. I think primarily it falls into the 1.a
16 category.

17 Q But I want to ask you to read on Page 5 of Exhibit A,
18 Paragraph 12, to yourself.

19 A Right.

20 Q And tell me whether or not you have any information
21 regarding that area of inquiry.

22 A I do not.

23 Q Mr. Cambra, I am going to direct you to look at
24 Paragraph 11, if you will, and immediately above that

1 Paragraph 12 on Page 5.

2 A Yes.

3 Q Are you aware of any studies conducted by the Health
4 Department of the City of New Bedford relating to
5 conditions in the Acushnet River, Acushnet River
6 Estuary, New Bedford Harbor, Buzzards Bay, and the
7 Rhode Island and Vineyard Sounds.

8 A Are you primarily concerned with PCBs?

9 Q Any.

10 A We do all the beach sampling in New Bedford. The
11 waters primarily for the coliform and fecal coliform
12 and shellfish. We work very closely with the Shellfish
13 Department. So we do those studies. We have done
14 some coliform in the past within the dike area and
15 inside to the north and besides that we haven't.

16 Q Earlier you were around the room when Mr. Calnen was
17 testifying. Did you hear his testimony?

18 A Yes, sir.

19 Q And I was asking him some questions regarding the
20 presence of coliform which, on occasion, necessitated
21 the closing of the beach.

22 A Yes.

23 Q And he indicated that, as part of that process when
24 notified, they would check what is going on at the

1 waste water treatment plant and look at the chemist's
2 report. Was he correct in stating it would be the
3 Health Department which would monitor and sample the
4 outfalls to determine whether that was the course of
5 the coliform?

6 A That is true.

7 Q Has it been the experience of the Health Department
8 that the presence of coliform which causes the beaches
9 to be closed was coming from the outfall pipes?

10 A To my recollection, 99 percent of the time and the
11 reason I say that and perhaps 100 percent, one time
12 there was a question as to whether or not a freighter
13 had discharged out there or not and all the other
14 times it had to do with the intensity of rainfall and
15 so forth. That and the overflowing into the Cove
16 and so forth of sewerage.

17 Q So it's been your experience over these 21 years at
18 least that the coliform which requires the beaches
19 to be closed, that has entered into the harbor or the
20 Cove after heavy rainfall which puts the raw sewerage
21 into the outflow pipes?

22 A Correct. Either throttle down at the plant being
23 necessary or just because of the great intensity
24 causing the overflow pipe to take it over.

1 Q With what frequency, to the best of your estimate,
2 are the number of times that the beaches were closed
3 last year due to the presence of coliform?

4 A Last year we had two. Two closures on the West Beach.

5 Q On West Beach.

6 A Yes. That is in the Cove.

7 Q How long were those closures?

8 A Each one lasted 24-hour periods.

9 Q Those are the only closures on the beach due to
10 coliform last year?

11 A Yes.

12 Q And the prior year?

13 A The prior year I don't recall any. To the best of
14 my recollection we had two closures.

15 Q What is the longest period of closure that you can
16 recall?

17 A Well, back somewhere around 1976 or early, I'm not sure
18 of the date at this time, we had a one-week closure on
19 the East Beach. There was a question of whether some
20 freighter had discharged out there or pump station
21 down. That never quite got resolved but it did cause
22 a closure of one week in July.

23 Q Are you aware of either beach being closed for any
24 reason other than the presence of coliform?

1 A I'm not aware of any, no. And I usually recommend
2 the closure.

3 Q So you are the person who recommends the closure?

4 A Right.

5 Q Sir, has the inner harbor, and by that I refer to the
6 area from what is now the dike up north towards
7 Acushnet, has that been closed to swimming?

8 A I don't recall any beach in that area anyways that
9 has closed by the City of New Bedford to the best of
10 my recollection. Only opens the area where they only
11 have lifeguards and that is the West and the East
12 Beaches.

13 Q You were brought up, sir, in the North End of New
14 Bedford?

15 A Yes.

16 Q And you were brought up in the area between, what
17 streets would it be?

18 A Well, Whitman Street and that is up around the corner,
19 if you are familiar with that area.

20 Q Were you ever aware of the inner harbor being used as
21 a swimming location?

22 A Not to my recollection.

23 Q Were you aware of it being used as a fishing location?

24 A No. Not to my recollection, no.

1 Q If it was, it would be before your time?

2 A I would say.

3 Q Sir, continuing on with that part of your duties to
4 work in conjunction with the shellfish warden and does
5 that involve analysis of samples of shellfish brought
6 in to you by the warden?

7 A Yes.

8 Q When did you first perform or start performing those
9 duties?

10 A Sometime in probably the late 1960's.

11 Q Going back again, do you know the locations from which
12 the shellfish that you had to analyze were taken?
13 Where they were taken?

14 A We have taken them on both the east side and the west
15 side. More so on the Cove side in recent years.

16 Q Are you aware of any shellfishing occurring in the
17 inner harbor prior to, say, 1970 and the inner harbor
18 again, the dike north to Acushnet?

19 A All I would hear is what the shellfish warden would
20 tell me that they catch someone once in a while coming
21 in there but I was not personally aware, no.

22 Q You were born and brought up in that area?

23 A Yes.

24 Q A few hundred yards from the river where you lived?

- 1 A Yes. Maybe a few more.
- 2 Q And did you ever see anybody shellfishing in that
3 harbor?
- 4 A Not in that area, no.
- 5 Q Never inside what is now the hurricane dike up towards
6 the Town of Acushnet?
- 7 A No.
- 8 Q Not that?
- 9 A Not that.
- 10 Q You have seen?
- 11 A Not that I have seen.
- 12 Q Did you ever see anybody fishing in that area?
- 13 A No.
- 14 Q Ever see anybody bathing in that area?
- 15 A No.
- 16 Q Now, going into the shellfish, what do you test them
17 for?
- 18 A Primarily for coliform and fecal coliform.
- 19 Q Has the City of New Bedford prohibited the taking of
20 shellfish at any time?
- 21 A The City of New Bedford?
- 22 Q Right.
- 23 A No. That is the preamble of the DEQE since it's a
24 closed area. The DEQE has that jurisdiction.

1 Q Well, has it always been a closed area?

2 A Well, I think there is some, the shellfish warden
3 has some communications on that. It's been, after the
4 last 30 years or so because of the coliform --

5 Q The shellfish has been closed in the New Bedford Harbor?

6 A To the best of my recollection, maybe 26 years,
7 somewhere in that ballpark.

8 Q And during that period of time you had the
9 responsibility on occasion to examine shellfish to
10 confirm the fact that the coliform was present in them?

11 A Yes.

12 Q At present when you examined shellfish, say, from the
13 Cove, what is the purpose of your examination? It's
14 to determine if there is coliform in it?

15 A Yes.

16 Q As far as you know now, that area is closed now?

17 A It is closed. Yes.

18 Q It's been closed?

19 A For extensive years.

20 Q Twenty-five?

21 A Yes.

22 Q Do you examine shellfish that are taken from any areas
23 that are not closed?

24 A Yes. On occasion. Bring one further out in the harbor.

1 Yes.

2 Q When you say further out in the harbor --

3 THE WITNESS: Further out in the
4 water, yes.

5 Q Can you give me a line or some geographic location?

6 A Beyond Ricketsons Point.

7 Q And you are also examining shellfish from out there?

8 A On occasion we do, yes.

9 Q And have there been occasions when the shellfish out
10 in that area beyond Ricketsons Point have been
11 contaminated by coliform, if you recall?

12 A Perhaps one time. I'm not even positive of that.
13 Perhaps, yes.

14 MR. McLAUGHLIN: Off the record.

15 (Off the record.)

16 Q Sir, you stated that, to the best of your knowledge,
17 that shellfishing was banned in the harbor for 26 to
18 30 years?

19 A Something like that.

20 Q Does that include the outer harbor out as far as
21 Ricketsons Point?

22 A No. I think that line was defined more recent than
23 that. I'm not positive but Mr. Bourque would be able
24 to respond to that.

1 Q But to the best of your knowledge, it went out how
2 far for those 25 years?

3 A I couldn't even answer that. I'm not positive.

4 Q From the dike north it was from that period of time?

5 A No. No, beyond the dike.

6 Q It was some point, some area beyond the dike?

7 A Yes.

8 MR. McLAUGHLIN: I have no further
9 questions.

10 CROSS-EXAMINATION

11 Q (By Ms. Maul) Sir, you don't test for PCBs; is that
12 right?

13 A No. You need an instrument called gas chromatograph.

14 MS. MAUL: Okay. Thanks.

15 CROSS-EXAMINATION

16 Q (By Mr. Centola) Sir, my name is Gary Centola and
17 I represent Fireman's Fund Insurance Company. I just
18 want to ask you a couple of questions. If you don't
19 understand one of my questions, please let me know and
20 I will repeat it or rephrase it.

21 A Yes.

22 Q A few minutes ago you mentioned that you had a
23 discussion, an oral communication with Aerovox and
24 Cornell-Dubilier representatives back in 1976; is that

1 correct, sir?

2 A Somewhere. It was concerning the capsulation of
3 waste.

4 Q Do you recall what the circumstances were that
5 precipitated that meeting?

6 A To the best of my recollection it was because there
7 was an order that the two industries would have to
8 take their waste that they had on hand that they had
9 accumulated and either ship them over to, over road,
10 to New York or New Jersey to these plants that could
11 destroy PCBs by incineration. This was looking at an
12 economical way of another alternative.

13 Q Did PCBs come up during that?

14 A That was disclosed on PCBs.

15 Q Do you remember who the individuals were from the
16 different companies that were present?

17 A No, sir. I don't.

18 Q Did you see the Mayor, if he was present?

19 A Yes.

20 Q And what was the Mayor's name?

21 A John Markey.

22 Q Was there a public hearing?

23 A No, sir.

24 Q Do you know who also was present in addition to you,

1 representatives of Aerovox, Cornell-Dubilier and the
2 Mayor?

3 A To the best of my recollection, some from the Planning
4 Department and possibly the waste water treatment plant
5 or D.P.W.

6 Q Do you know, was the problem, in fact, resolved that
7 you were discussing during that meeting? Was the
8 situation resolved that you were discussing during
9 that meeting?

10 A The only discussion at that meeting was concerning
11 whether or not incapsulation would be one way of
12 doing it.

13 Q Can you tell me what that means, "incapsulation"?

14 A To build sort of a coffin, if you will, out of cement
15 and that way they put waste, hazardous waste material
16 into it and that would be just a way of storing it
17 until some date that they could come up with some
18 formulation or system of destroying the PCBs.

19 Q Was there any follow-up to that meeting? Do you know?

20 A Yes. In fact, there was. The communications that
21 came down that the EPA had approved uncertain
22 circumstances to the building of this incapsulation
23 or so and then there was a cost factor and it never
24 did come about.

1 Q Is there something that you were asking the industry
2 to do?

3 A We were not. They, the thing was that the industries
4 were ordered to get rid of it. They couldn't bring
5 it to the land fill. That was the problem. They used
6 to bring it to the land fill and the DEQE and so forth
7 had disallowed it and this was, they were hoping to
8 get a variance so that they could bring it to --

9 Q When you say, "it," you are talking about PCBs?

10 A Yes.

11 Q Who banned it? Do you know?

12 A Well, between EPA and the DEQE.

13 Q And what year was that?

14 A To the best of my recollection, don't hold me to this,
15 probably was somewhere around 1976 or 1978. Somewhere
16 in there.

17 Q Did you bring documents with you here today?

18 A Communications, yes.

19 MR. CENTOLA: Can we mark those
20 documents?

21 THE WITNESS: Pardon.

22 MR. CENTOLA: Can we mark those
23 documents?

24 THE WITNESS: Yes.

1 MR. CENTOLA: Do you want to do this
2 collectively?

3 MR. CONNOLLY: Yes. Since those are
4 loose, will you assure me that they will all stay
5 together? Do you have a folder?

6 THE WITNESS: I have a rubber band.

7 MR. CONNOLLY: Can we get a manila
8 folder or something?

9 MR. McLAUGHLIN: Why don't we take
10 a five-minute recess.

11 (Whereupon, a short recess was then
12 taken.)

13 Q Mr. Cambra, while we were on our break, did I ask you
14 to segregate out documents from the pile of documents
15 that you brought that concern themselves with the
16 meeting that you testified to in approximately 1976?

17 A Yes.

18 Q Okay. And did you do that?

19 A Yes.

20 MR. CENTOLA: Why don't we mark this
21 group, this is the group that you segregated out for
22 us?

23 THE WITNESS: That is the one.

24 MR. CENTOLA: Looking at this group,

1 before we mark it, does this refresh your recollection
2 as to the year in which the meeting that you discussed
3 took place?

4 THE WITNESS: As I said, somewhere
5 between 1976 and 1978.

6 Q Well, if you look at this group of papers, can you
7 refresh your recollection on the exact year, if
8 possible?

9 A Somewhere around September of 1976.

10 Q So your recollection has been refreshed and it's
11 September of 1976, sir?

12 A Somewhere in that time, yes.

13 MR. CENTOLA: Can we please have
14 this group marked as Exhibit 15.

15 (Whereupon, the group of documents
16 was then marked as Exhibit 15 for
identification.)

17 Q Were these documents maintained in the normal course
18 of business of the Health Department that you worked
19 for, sir?

20 A Yes.

21 Q Sir, where were those documents kept prior to you
22 coming here today?

23 A In a file concerning PCBs.

24 Q A file concerning PCBs?

1 A Yes.

2 Q And were they maintained in that file pursuant to the
3 normal course of business at the Public Health
4 Department?

5 A Anything that pertained to that, we have the
6 secretary put it into that file.

7 Q And you maintained that file, sir?

8 A Yes.

9 Q And the second group of documents, are these documents
10 also maintained in the normal course of business of
11 the Public Health Department that you work for?

12 A Yes.

13 MR. McLAUGHLIN: All of them?

14 THE WITNESS: Well, these here, you
15 know, all reference that came to our attention. Some
16 of them refer to us and so those were kept in the same
17 file.

18 Q So when something would come to your attention
19 concerning PCBs, you would put it in a file in your
20 department, sir?

21 A Yes.

22 MR. CENTOLA: Let's mark this as
23 Exhibit No. 16 for identification.

24 (Whereupon, the file containing
documents was then marked as
Exhibit 16 for identification.)

1 THE WITNESS: Some of these come
2 indirectly to us.

3 Q Sir, do you know if -- was it your testimony that this
4 incapsulation process as you described it, never took
5 place?

6 A That's correct.

7 MR. CENTOLA: I have no further
8 questions.

9 CROSS-EXAMINATION

10 Q (By Mr. Culbert) My name is Andrew Culbert and I
11 represent Lumberman's Insurance Company. You testified
12 earlier concerning a PCB file that you maintain in
13 the Health Department; is that correct?

14 MR. McLAUGHLIN: I am not going --
15 I can't instruct the witness not to answer. I haven't
16 asked him those questions today. We have essentially
17 agreed to try to get through these depositions for
18 trial pursuant to Judge Young's order. I have not
19 asked questions specifically relating to that. I can't
20 tell you not to ask questions. We have to get through
21 these depositions pursuant to the judge's order. We
22 are the only parties going to trial this September.

23 MR. CULBERT: I don't think that my
24 questioning will take up very much time.

1 Q Did you bring with you the entire contents of that
2 PCB file?

3 A To the best of my knowledge, all that I had.

4 Q And the contents of that file are the documents that
5 have been marked as Exhibits 15 and 16?

6 A Yes.

7 Q Other than that file, are you aware of any other
8 documents in your department that pertain to the
9 pollution of the New Bedford Harbor or the Acushnet
10 River?

11 MS. SWEENEY: Objection.

12 A No. I am not aware of it.

13 Q Other than documents contained and what has been
14 marked as Exhibits 15 and 16, are you aware of any
15 other documents in your department that constitute
16 correspondence received from the Aerovox facility?

17 A I'm not aware of it.

18 Q And would that also be true for correspondence received
19 from the Cornell-Dubilier facility?

20 MS. SWEENEY: Objection. There is,
21 first of all, this even outside of the scope of the
22 deposition notice. I'm going to ask you to confine
23 your questions and any others to the scope of the
24 direct examination.

1 MR. CULBERT: You can answer the
2 question.

3 A Pardon.

4 MR. CULBERT: You can answer the
5 question.

6 A I'm not aware of any.

7 MR. CULBERT: Okay. I have no
8 further questions.

9 (Whereupon, the deposition was then
10 concluded at 3:45 p.m.)

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