

21

ADMINISTRATIVE RECORD

LIBBY #1

23

495548

1 housekeeping in the lunchroom.  
 2 Q The next document I'd like to direct your  
 3 attention to is one entitled, Source Emissions,  
 4 Results of Surveys, 1975. Would that document have  
 5 been maintained by Grace in its business records in  
 6 the ordinary course of its business?

7 A Yes, it would.

8 Q And am I correct in understanding that  
 9 this is a compilation apparently for the year 1995  
 10 of results of dust surveys setting forth the high,  
 11 low and average counts for various locations around  
 12 the facility?

13 A I think you said "1995." 1975?

14 Q Yes. 1975. I'm sorry if I said "1995."

15 A This was a report of samples taken to find  
 16 points where dust was being emitted so that repairs  
 17 could be made or changes made. These were  
 18 engineering samples, as we called them, rather than  
 19 personnel samples.

20 Q And for further identification purposes,  
 21 since we'll be referring to these documents at other  
 22 times on the one hand and yet we don't want to  
 23 arbitrarily assign them an exhibit number yet so we  
 24 can integrate them into the common exhibit number  
 25 system if any of them are selected for that purpose,

1 centimeter of air.

2 Q How often was downtown Libby sampled?

3 A These kinds of samples, the engineering  
 4 samples, were normally done by the Libby people, and  
 5 I don't know offhand or recall. When we went to  
 6 sample, we'd usually sample in Libby once or twice a  
 7 year. Maybe we'd take one or two or three samples  
 8 downtown. I don't recall what Randy Geiger did  
 9 later in the late '70s ongoing.

10 Q Why was the downtown Libby air sampled?

11 A I sampled it to see if there was any fiber  
 12 detectable. I never found any. I'm somewhat  
 13 surprised at these results.

14 Q What was the likely source of these  
 15 results? For instance, I'm picking -- The St. Regis  
 16 office area is the middle one, and it says, 1.5.  
 17 What would be the likely source of that fiber?

18 A I don't know. I don't know. As far as I  
 19 could tell in my sampling, there wasn't any  
 20 significant airborne fiber moved, you know, any  
 21 distance. This is extremely unusual, considering  
 22 that some of these levels appear to be as high as  
 23 samples in the service areas, for instance, on the  
 24 hill. I don't have any idea, other than perhaps the  
 25 contamination of the clothing of the person doing

22

1 I think what I'll do is I'll also -- I don't have a  
 2 specific date on this one, which kind of brings this  
 3 to mind, so I think what I'm going to also do is  
 4 just refer to the page numbers that we have assigned  
 5 them in these volume documents, and that will at  
 6 least allow us to find this document at a later  
 7 date, if necessary, and is particularly useful when  
 8 we don't have a date on the document itself. So we  
 9 have assigned this document the numbers 2-31 and  
 10 2-32.

11 The second page of the document indicates  
 12 that there was testing done in downtown Libby at the  
 13 new Penney's store, the St. Regis office area and  
 14 the hospital area; is that correct?

15 A That's correct.

16 Q And did you participate in that process?

17 A I didn't participate in these samples, no.

18 Q There is no indication as to the  
 19 particular quantification used here in terms of  
 20 fibers per what. During this time period, assuming  
 21 that it is the compilation of 1975 surveys, what  
 22 would have been the system being used to count the  
 23 fibers?

24 A Fibers per cubic centimeter of air.

25 Fibers greater than five microns in length per cubic

24

1 the sampling, but that's speculation.

2 Q I have here, for instance, you know -- I'm  
 3 just arbitrarily picking one here, following up on  
 4 your statement. On the skip car loading, the  
 5 average for the skip car loading is 1.39. As I  
 6 recall, the skip car loading is down in the bottom  
 7 level of the old dry mill, or at least I think it  
 8 was still in 1975.

9 A Yes. Yes.

10 Q And so comparing that number with the  
 11 number at the St. Regis office area or, for that  
 12 matter, the hospital area of 1.1 is a source of  
 13 surprise to me and, I take it, is a source of  
 14 surprise to you that it would come up at that level?

15 A Yes, it is. I don't recall ever having  
 16 seen this document, because I certainly -- If I did,  
 17 I would have been out there trying to find out what  
 18 possibly could have occurred, because that's  
 19 inconsistent with any results I ever got.

20 Q The next document that I'd direct your  
 21 attention to is one entitled, Research Grant  
 22 Application to W.R. Grace and Company for  
 23 Epidemiological Studies by Dr. McDonald. Do you see  
 24 that document?

25 A Yes, I do.