

Exhibit 5

STATE OF NEW YORK
SUPREME COURT COUNTY OF RENSSELAER

JAY BURDICK, CONNIE PLOUFFE,
EDWARD PLOUFFE, FRANK SEYMOUR,
EMILY MARPE, as parent and natural
guardian of E.B., an infant, and
G.Y., an infant, JACQUELINE MONETTE,
WILLIAM SHARPE, EDWARD PERROTTI-SOUSIS,
MARK DENUE and MEGAN DUNN,
individually, and on behalf of all
similarly situated,

Plaintiffs,

- Against -

INDEX NO:
00253835

TONOGA, INC. (d/b/a TACONIC),
Defendant.

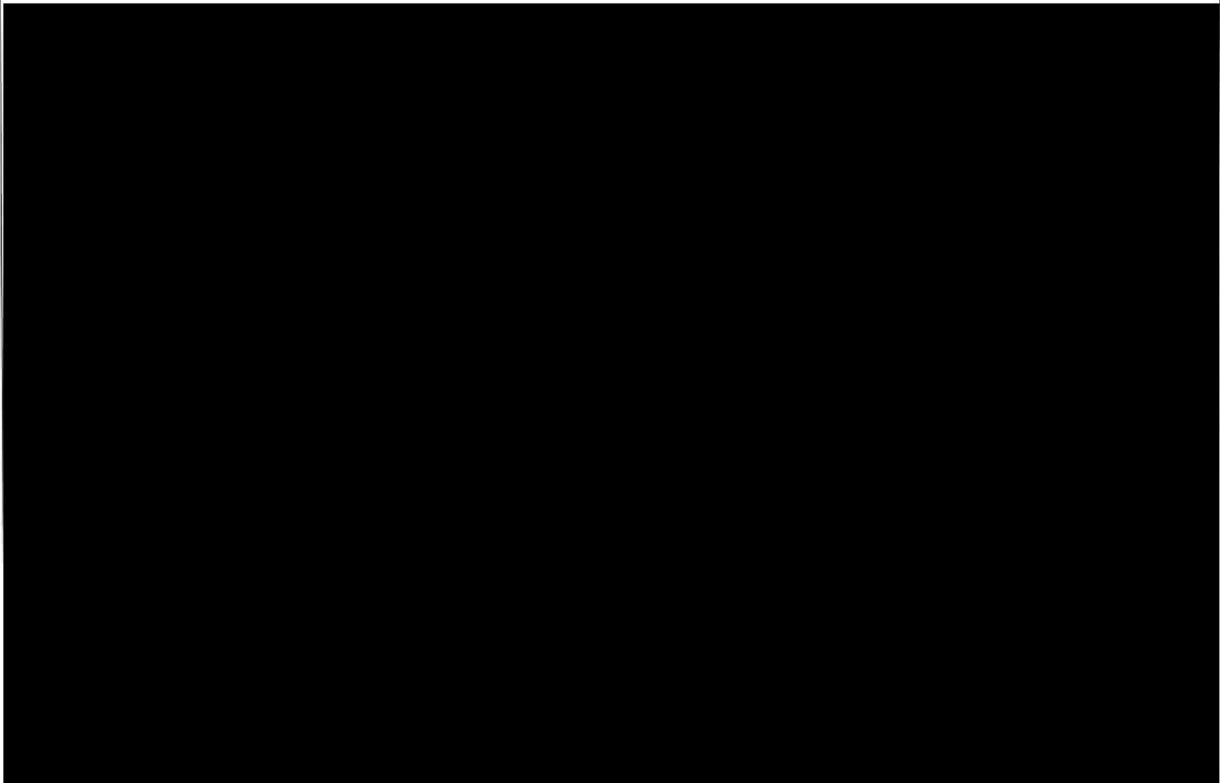
VIDEOTAPED DEPOSITION of: TIMOTHY KOSTO
(Defendant Agent)

Thursday, July 26, 2018
8:33 a.m. - 6:27 a.m.

HELD: Bond, Schoeneck & King, PLLC
22 Corporate Woods Boulevard
Albany, New York 12866

Reported by: Deborah M. McByrne
Videotaped by: Corrine Gates
Job No. 2935112

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Mr. Kosto, when did you first learn that some PTFE dispersions contained the chemical APFO?

A. I would have learned that in 2003.

Q. When you first started, approximately?

A. Approximately, yes.

Q. And when did you first learn that APFO or acid PFOA could be harmful to human health or the environment?

MS. DUFFY: Object to the form.

A. I learned in 2003 that there were concerns being raised sufficient to cause study of APFO, PFOA, and its effects.

Q. Now, at the time that you first learned about APFO,

1 A. Okay.

2 Q. With that definition, were you aware in 2003, of
3 contamination of the Parkersburg facility, of the
4 community around the Parkersburg facility, with
5 PFOA?

6 A. I was aware in 2003 that there were concerns around
7 the Parkersburg facility about the presence of PFOA
8 in groundwater.

9 Q. And that would be outside the confines of the
10 Parkersburg plant itself; is that correct?

11 A. Yes, that would be outside the confines of the
12 plant.

13 Q. And was it your understanding that the groundwater
14 that was contaminated outside the plant in
15 Parkersburg, was actually used for drinking water by
16 some of the population outside of the plant?

17 MS. DUFFY: Object to form.

18 A. I understand that one of the issues related to the
19 DuPont, then-DuPont facility in Parkersburg, was the
20 presence of PFOA in the groundwater from which
21 drinking water supplies were drawn.

22 Q. And when you learned that in 2003, you said that
23 there were concerns raised about people drinking
24 water that was contaminated with PFOA; correct?

25 MS. DUFFY: Object to form.

1 A. There were people who had concerns about the
2 presence of PFOA in the groundwater that was used
3 for drinking water.

4 Q. And what concerns were those that you learned at
5 that time?

6 A. I would, I think, best characterize those as
7 concerns about its presence.

8 Q. So there was -- did you learn anything about
9 concerns about its accumulation in people that drank
10 water that was contaminated with PFOA?

11 MS. DUFFY: Object to form.

12 A. So the concerns that I understood -- The concerns I
13 understood to be clear, were related to presence.

14 Q. Presence in the water or presence in the body?

15 A. Both.

16 Q. And did you learn at that time, that PFOA
17 accumulated in the body and had a long half-life?

18 A. I did learn that PFOA has a long half-life and is
19 bioaccumulative.

20 Q. And by "bioaccumulative", do you mean that as people
21 drink it, it accumulates inside the body in a
22 concentration higher than what they ingested?

23 A. I mean, that the equilibrium level of PFOA in biota,
24 is generally higher than the level present in water
25 or other material that that biota consumes.

1 Q. Now, you answered my question by saying what you
2 knew was clear, was what you just told me; correct?

3 MS. DUFFY: Objection, to the extent
4 it mischaracterizes his testimony.

5 Q. That the contamination in the water and the
6 accumulation in people, that was clear at that
7 point?

8 MS. DUFFY: Objection, to the extent
9 it mischaracterizes testimony. You can answer.

10 A. So my answer was that the issue that was clear in
11 2003, was that PFOA was present.

12 Q. In the environment and in people's bodies?

13 A. Yes.

14 Q. Were there other issues that were discussed at that
15 point about possible health effects of PFOA that
16 accumulated in people's bodies that, in your view,
17 were unclear?

18 A. There were, to my memory, many discussions in that
19 manufacturing and regulatory community about what
20 those potential risks may have been. But those
21 indeed were not clear.

22 Q. Okay. What were the discussions that you could
23 recall about that topic?

24 A. I remember, for example, reading about the need to
25 establish review panels and other regulatory devices

1 to review the state of science about the potential
2 health risks. As an example, it was regular
3 discussion that some of the possible risks were
4 actually associated with animal models that have no
5 corollaries in the human physiology. And so the
6 application of those kinds of things simply was not
7 clear.

8 Q. What were the particular health hazards that you
9 learned about at that time that were unclear?

10 MS. DUFFY: Object to form.

11 A. Generally speaking, my awareness of the health
12 hazards was related to, I think there was a study on
13 the birthweight of children born to employees with
14 the potential exposure. And there were certainly
15 discussions about cancerous growth in some of those
16 animal models.

17 Q. Anything else you can recall?

18 A. No.

19 Q. When did you first learn that groundwater beneath
20 the Taconic facility was contaminated with PFOA?

21 MS. DUFFY: Object to form.

22 A. I don't remember the precise date.

23 Q. Was that knowledge that was imparted to you upon
24 your beginning at Taconic in 2003?

25 A. No, it was not.

1 Q. Okay. And both of those controls came back
2 non-detect; correct?

3 A. That's correct.

4 Q. So there was no PFOA in either of the samples from
5 RPI or from your house?

6 A. No, we cannot say that. We can only say that those
7 samples are non-detect, so they would be below the
8 detection limit of the test in 2005.

9 Q. Got it.

10 And then there's a test that's
11 04-13-03, and it's listed as 147 Coon Brook Road;
12 correct?

13 A. That's correct.

14 Q. And that's one of the properties that was owned by
15 Taconic; correct?

16 A. It's one of the adjacent properties. I don't know
17 the details of the property ownership.

18 Q. There appears to be a parenthetical, and does it say
19 Lori in it?

20 A. I believe that's what it says.

21 Q. And is that a person who lived at 147 Coon Brook
22 Road, if you could recall?

23 A. My recollection is that's what the reference means.

24 Q. And is Lori, Suzanne Seymour's daughter?

25 A. I believe that Lori refers to Suzanne Seymour's

1 daughter.

2 Q. And the results from 147 Coon Brook -- withdraw that
3 question.

4 147 Coon Brook Road had its own well;
5 is that correct?

6 A. That's my recollection.

7 Q. So did you go to 147 Coon Brook Road and take a
8 sample out of the tap?

9 A. I don't believe I did.

10 Q. Did you have somebody else do that?

11 A. I -- My recollection is that Mr. Kawczak took a
12 sample from adjacent properties, and I took the
13 control samples, but -- That's my recollection.

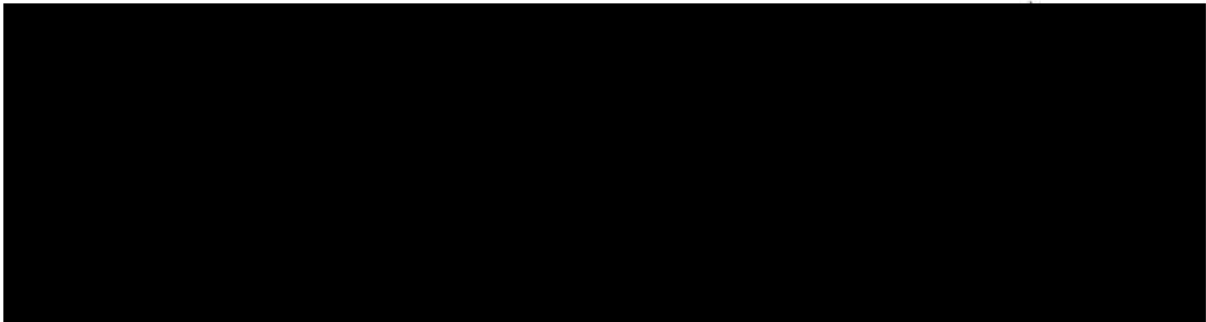
14 Q. Okay. So either Mr. Kawczak took them at your
15 direction or somebody else took the sample at your
16 direction?

17 A. I would say that statement mischaracterizes the
18 relationship. Mr. Kawczak and I weren't really,
19 either one of us, working at the other's direction.
20 We were working in concert.

21 Q. All right. Let me ask the question a different way.
22 The two samples that were taken from RPI and
23 161 Shufelt Road, which is your home, were taken
24 because you wanted those samples taken; correct?

25 A. That's correct.

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Q. Okay. At some point in time was that changed, such that alternative drinking water was brought in for the employees?

A. Yes.

Q. And was that after you tested the groundwater and found PFOA in the groundwater?

A. Yes, that's my recollection.

Q. And at that point you also installed carbon filtration systems for the process water; correct?

A. By process water, what do you mean?

Q. The Wells 1, 2 and 3 that we discussed.

A. Yes, that's correct.

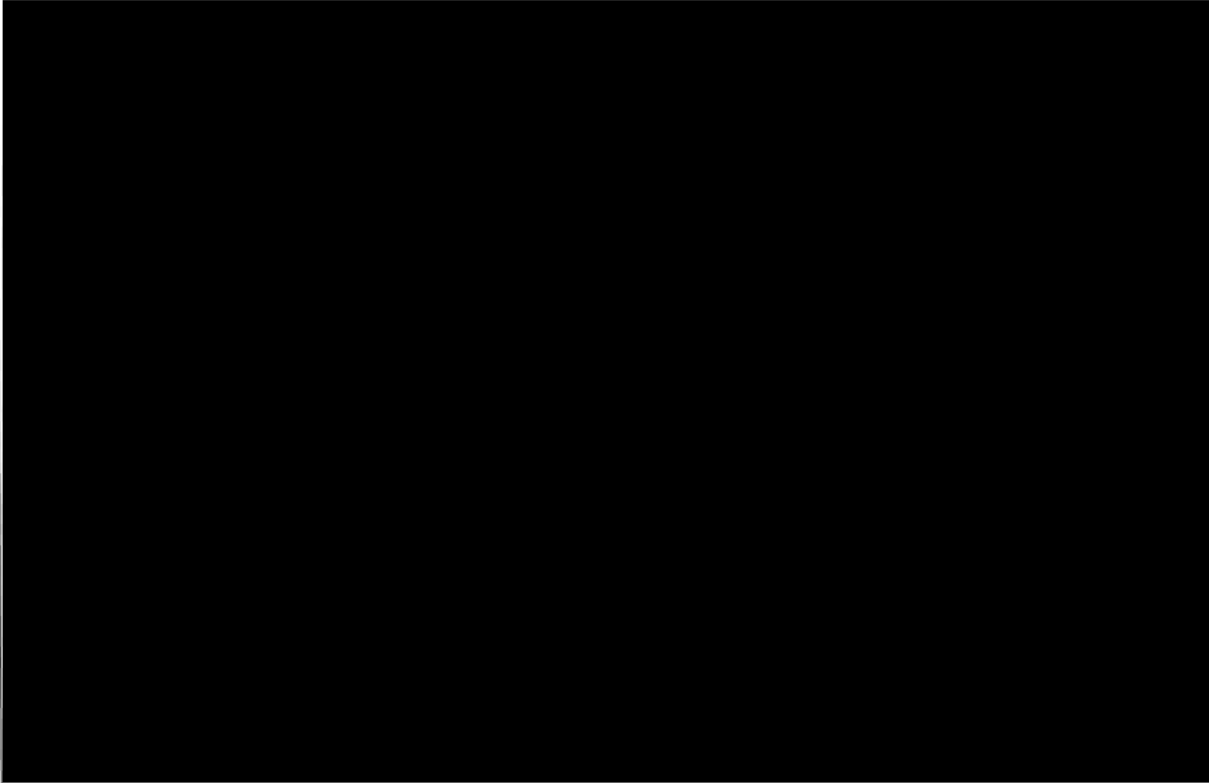
Q. What was done to determine the efficacy of the carbon treatment between 2006 and 2012?

A. I don't recall testing for efficacy.

Q. Now, you said that at some point in time when you were at DuPont, you were told that they had a changeover of five years for their carbon filters; was that your testimony?

A. I did have a conversation about that, yes.

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Q. Do you -- Were you involved in any discussions about doing further testing of any of these homes that are depicted on page 170 for PFOA in their drinking water, at any time prior to 2016?

A. I was involved in discussions about testing locations for PFOA. I don't remember discussions specifically about whether and when to test certain properties, or to test certain properties again or repetitiously.

Q. Well, what do you remember about the topic of doing further testing, beyond what we've looked at today, of PFOA in the groundwater in the vicinity of the Taconic plant?

1 A. I don't remember any discussions related to
2 additional testing, beyond the package of material
3 that we have gone through.

4 Q. So at some point in time after, at or after March of
5 2006, which is the last Exygen labeled test we have,
6 was there a discussion that you had come to some
7 conclusions, that required no further testing of the
8 groundwater?

9 A. I don't recall any discussion that led to any kind
10 of decision that we would not test groundwater
11 again.

12 Q. Do you remember any discussions about the cost of
13 testing and that being prohibitive of continuing to
14 test the groundwater?

15 A. I don't remember any discussions ever about the cost
16 of testing being prohibitive.

17 Q. Who did you have the discussions with when you
18 talked about doing further testing, that you
19 mentioned?

20 A. These discussions would have been with Mr. Kawczak,
21 for example. They would have been, at certain
22 points, with the staff and the plant. My
23 recollection of discussions, to a great extent,
24 because of my focus in the plant, became very much
25 directed toward removing PFOA from the raw material

1 A. One of the objectives of all the work to implement
2 lower concentrations and ultimately dispersions made
3 without PFOA, was to eliminate it as the source of
4 PFOA that could possibly enter the environment.

5 Q. Okay. What discussions were there about how to deal
6 the PFOA that had already been released into the
7 environment and was already in the groundwater at
8 Taconic after March of 2006?

9 A. I don't remember the discussions about the PFOA in
10 the groundwater after that.

11 Q. So are you saying that once you discovered that
12 there was PFOA in the groundwater and you put the
13 carbon filtration systems on your own wells, your
14 only action was to try to change the process so that
15 no -- that PFOA would be reduced and eventually
16 eliminated?

17 MS. DUFFY: Objection to the extent it
18 mischaracterizes testimony. Go ahead.

19 A. That was not our only action. In fact, we informed,
20 proactively, the regulatory agencies. We asked them
21 for responses, for guidance. They have come to our
22 facility. They knew and discussed with us the
23 measures that we were taking. And so at that point
24 there's -- there's not guidance from the bodies that
25 should provide that guidance upon which we could act

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BY MR. SCHWARZ:

Q. Mr. Kosto, with regard to all of the testing that we've just reviewed, was there a budget within any of the Taconic departments, to pay for that testing, the environmental testing that was done?

A. There was not, to my knowledge, a budget specifically for testing. But Taconic operates by a little different model, I think I would say, in which expenses are, by and large, individually justified, or individually explained and made. So the -- what that means is a different structure. So there's not somebody saying, well, I, for example, in my department get -- I'm picking a number, but \$10,000 that's mine to spend. I have to show that each of the expenses has value. But the other side of that is, there's never any point at which I can't go and say, you know, I think this is an important thing to do and we should do it, and be told, well, you can't do it because the budget doesn't have room, or the budget is too limited. There's always the ability to go and get resources to, in my experience, to do that kind of work.

Q. Okay. Are you saying that on no occasion did you ever make a request that was turned down?

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Q. Did you clarify that? Was there any indication that once you signed up, that they would forcibly come to your location and do the testing, and you have no right to stop them?

A. We were asking --



We were asking in the group what kind of definition could be put around these things, and the answers to that were not clear.

Q. Okay. And then you also raise concerns about potential publicity associated with participation. And what was the concern about potential publicity associated with the participation that you voiced at that time?

A. So there was the --

That's tied to the confidentiality issue.

At the time, based on my recollection,

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the public situation and the development of the --
The development of the publicity certainly around
the presence of PFOA in the water supplies around
the DuPont facility, presented for me, at the time
frame, a concern about data being in places where it
was going to be misused, used for inappropriate
purposes, taken out of context and, otherwise,
essentially taken to misrepresent situations and
circumstances in our facility in Petersburg.

Q. Now, if I have my dates correctly, is this before or
after you learned of the groundwater contamination
underneath the plant at Taconic?

MS. DUFFY: Object to form.

A. I would most appropriately answer that question by
going back through all of the exhibits.



1 Q. And what was the danger, in you view, of scientists
2 keeping paperwork with regard to the analysis of
3 APFO that they were going to do?

4 A. There is potential in this project to have included
5 non-scientific paperwork, as well. So, for example,
6 there are commercial information that potentially is
7 included in the disclosures associated with trying
8 to perform this work.

9 Q. What about the information with regard to how much
10 APFO was getting out into the environment from a
11 particular facility, were you concerned about that?

12 A. I think I had a concern about how information was
13 going to be used, not that the information was going
14 to exist.

15 Q. Well, what would be your concern about how
16 information regarding the percentage of APFO that
17 came into a facility, that went out through the
18 stacks would be misused?

19 MS. DUFFY: Object to form.

20 A. Can you restate the question?

21 Q. Yes. What was your concern about information about
22 the percentage of APFO that came into the facility,
23 that was exhausted through the stacks, how would
24 that be misused?

25 MS. DUFFY: Same objection.

1 A. In my experience, information like that you're
2 describing, that is the concentration of PFOA that
3 could be in, for example, an air stream, can be
4 taken out of context and misused.

5 Q. Did you have experience with that?

6 A. I've had many experiences with it.

7 Q. At Taconic?

8 A. I had experiences with it at Taconic.

9 Q. Okay. Tell us about that. Especially the ones that
10 occurred before October of 2003, when you wrote this
11 e-mail.

12 A. Okay. At this point you have changed the question.

13 Q. Yes.

14 A. Okay.

15 Q. I'm sorry, put you back at the time that you wrote
16 this e-mail and you had that opinion, what was your
17 experience level that upon which you base that
18 opinion?

19 A. My experience specifically relating to
20 fluoropolymers, was observing -- came from observing
21 the activities of certain organizations, for
22 example, lobbying organizations, for whom I had come
23 to understand as an example, that the PFOA issue was
24 a tool to be manipulated and used to accomplish a
25 different regulatory purpose.

1 people engaged in government lobbying. I recognize
2 that all of these things exist, they are part of our
3 life. But trying to outguess a lobbyist, instead of
4 doing the job I was expected to do, to work in the
5 plant, to make products better, to try and help make
6 processes safer, was a more important thing to be
7 done, and so it would be best simply not to take the
8 risk of having information in a place where groups
9 like that could misuse it.

10 Q. Now, you had indicated that one of your works, your
11 life's work, was to determine the mass balance of
12 APFO at your facility; correct?

13 A. I indicated that one of the things I did was to
14 perform a material balance, mass balance on part of
15 the process.

16 Q. Right. And it was part of process that you couldn't
17 perform a mass balance on because you didn't have
18 the data?

19 A. That's correct.

20 Q. And this was an effort to obtain data to do an
21 analysis of that part of the process of the type of
22 work that you did; correct?

23 A. That's correct.

24 Q. And so this was going to fill a gap in your
25 scientific knowledge that you didn't have at the

1 time, as to how much APFO was being either consumed
2 or exhausted out of the process; correct?

3 A. It is and, in fact, it did precisely fill that gap.

4 Q. And so --

5 A. But maybe I need to clarify that answer. This
6 process provided me with that information, without
7 my -- without Taconic's participation.

8 Q. So you got the benefit of it, without taking the
9 risk?

10 A. That's correct.

11 Q. And were you confident in looking at the results of
12 the mass balance analysis, that it simulated your
13 process enough to give you meaningful scientific
14 information about how much of the PFOA was actually
15 being consumed and exhausted?

16 A. I am.

17 Q. Okay. Did you recommend, one way or the other, to
18 either Andy Russell or Tom McCarthy, as to whether
19 Taconic should participate in this program?

20 A. I did make a recommendation in that regard.

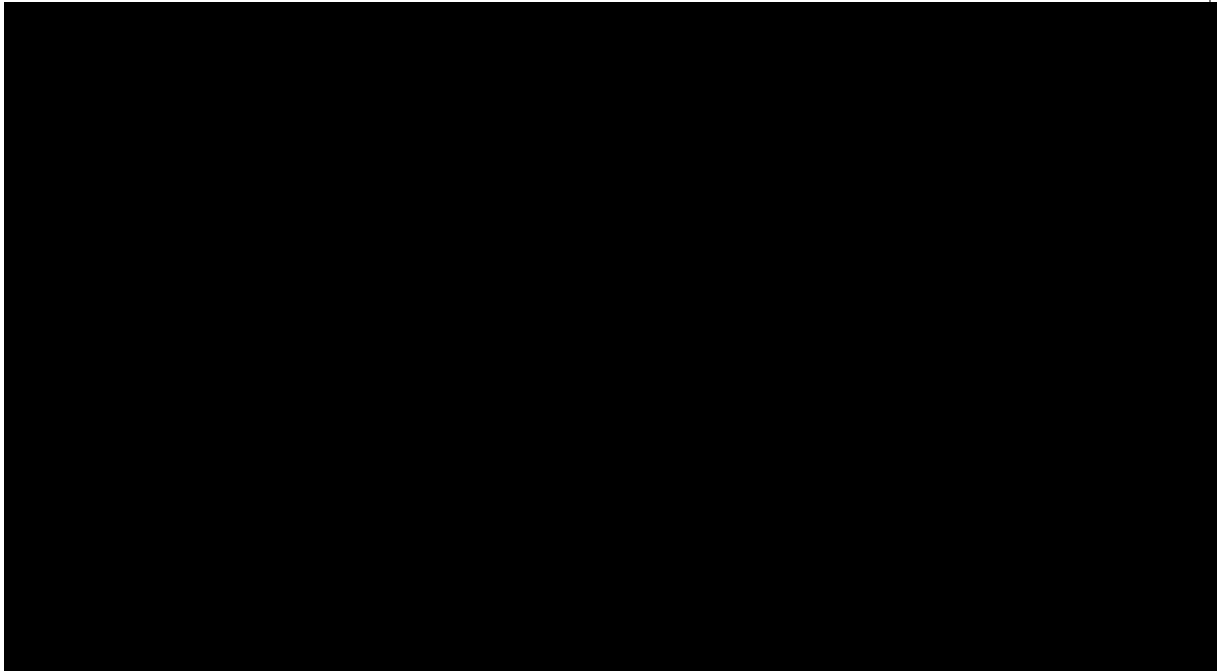
21 Q. And what was your recommendation?

22 A. My recommendation was to not participate in the
23 program.

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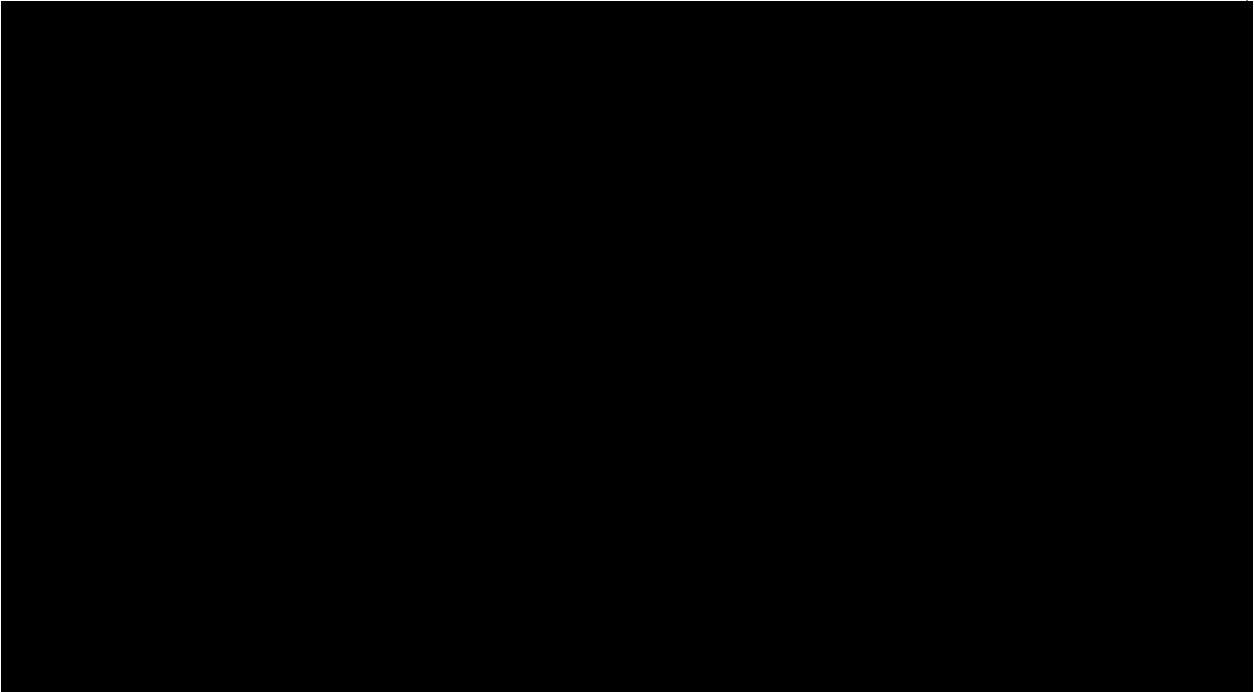
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Q. Now, if we could take a look at Exhibit 177, can you tell me if this is a document you recall receiving from the fluoro manufacturers group?

A. This is a document I received from a member of the fluoropolymer processors group.



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9 Q. Now, Exhibit 177 is what's entitled a Draft Final
10 Report; is that correct?

11 A. That's how it's titled, yes.

12 Q. Did you receive a non-draft final report at any
13 time?

14 A. I did not receive a non-draft final report.

15 Q. So when you said that the gap in your knowledge with
16 regard to mass balance analysis of the type of
17 process that you ran at Taconic was filled by the
18 mass balance analysis, it was the draft report you
19 were referring to?

20 A. The report I referred to for information, was the
21 draft report I had.

22 Q. Okay. Did you ever ask for the final report from
23 anyone?

24 A. I didn't need to ask for the final report. It was
25 available.

1 Q. And how was it made available?

2 A. It's made available by the EPA.

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Q. And so this would be a particularly important section of the report, then, to inform you about that information you didn't have with regard to what happened to the APFO that came in with the dispersions?

A. The data on glass-cloth processing contained in this report, is the most important data, the most applicable data for our process.

Q. And the top of the second paragraph says, "The APFO detected in the air exhaust from oven ranges from" -- "from the oven", excuse me, "ranges from 9 to 19 percent for sample processes." Do you see that?

A. That is what the sentence says, yes.

Q. Okay. And that would mean that 9 to 19 percent of the APFO that comes into the plant through the dispersion, goes out the stacks?

A. I don't know if that's what it says.

Q. Well, what do you think that means?

A. If you could give me a minute to read the -- that section of the report.

Yes, so I think that the conclusion from that statement is that the APFO that could be

1 detected in the exhaust train would be between 9 and
2 19 percent.

3 Q. Okay. So that would be the part that didn't go out
4 in the wastewater, didn't go out in the product, and
5 didn't get destroyed?

6 MS. DUFFY: Object to form.

7 A. That would be the part which comes out of the oven
8 and goes from the oven exhaust.

9 Q. Right.

10 A. It does not go into the environment -- or we cannot,
11 we cannot draw the conclusion that that goes into
12 the environment at Taconic's facility in Petersburg.

13 Q. And is that because of the Fume Eliminator?

14 A. It is because of the Fume Eliminator.

15 Q. What about when it used to have the Smog-Hog, what
16 percentage would that be?

17 A. I can't even predict what that would be. I have no
18 knowledge of the Smog-Hog and how it functioned.

19 Q. But the Fume Eliminator was there when you got this
20 report, correct, was in place?

21 A. The Fume Eliminator was in place when we had this
22 report.

23 Q. So you said that this report was going to fill gaps
24 in your knowledge. But you're suggesting that there
25 was another gap now, because you didn't know how

1 much of the APFO, of the 9 to 19 percent of the APFO
2 that went into the Fume Eliminator came out of the
3 Fume Eliminator; right?

4 A. It's correct, that would be a gap.

5 Q. So what testing did you do, at that point, to
6 determine how much of that 9 to 19 percent of the
7 PFOA, was captured by the Fume Eliminator?

8 A. I don't know.

9 Q. Well, wasn't that of interest to you when you were
10 filling gaps in what your knowledge of, as to what
11 happened with the APFO?

12 A. I would say that my focus at this time, when I was
13 filling the gaps, was mostly inside the plant.

14 Q. Not what went out into the environment, that wasn't
15 your focus?

16 A. Evaluating the discharge in the Fume Eliminator was
17 not part of my role or responsibility in the
18 company.

19 Q. Whose role or responsibility was that?

20 A. I would say that was Mr. Kawczak's.

21 Q. Did you share this report with Mr. Kawczak when you
22 received it?

23 A. I don't remember.

24 Q. Did you tell Mr. Kawczak that he should test the
25 Fume Eliminator exhaust to see how much of the 9 to

1 19 percent was being exhausted into the environment?

2 A. I don't remember.

3 Q. Did you ever talk to EPA about the results of this
4 report -- excuse me.

5 Did you ever talk to anybody from the
6 DEC about the results of this report to discuss how
7 much APFO was going into the environment through
8 your stacks.

9 A. I did not personally discuss that with the DEC, but
10 I don't think that would have been reasonably in the
11 expectation of my role.

12 Q. Do you know if Mr. Kawczak or anyone else who did
13 interact with the DEC shared the results of this
14 report with the DEC?

15 A. No, I don't know.

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20 Q. How soon after January of 2005 did the public report
21 come out?

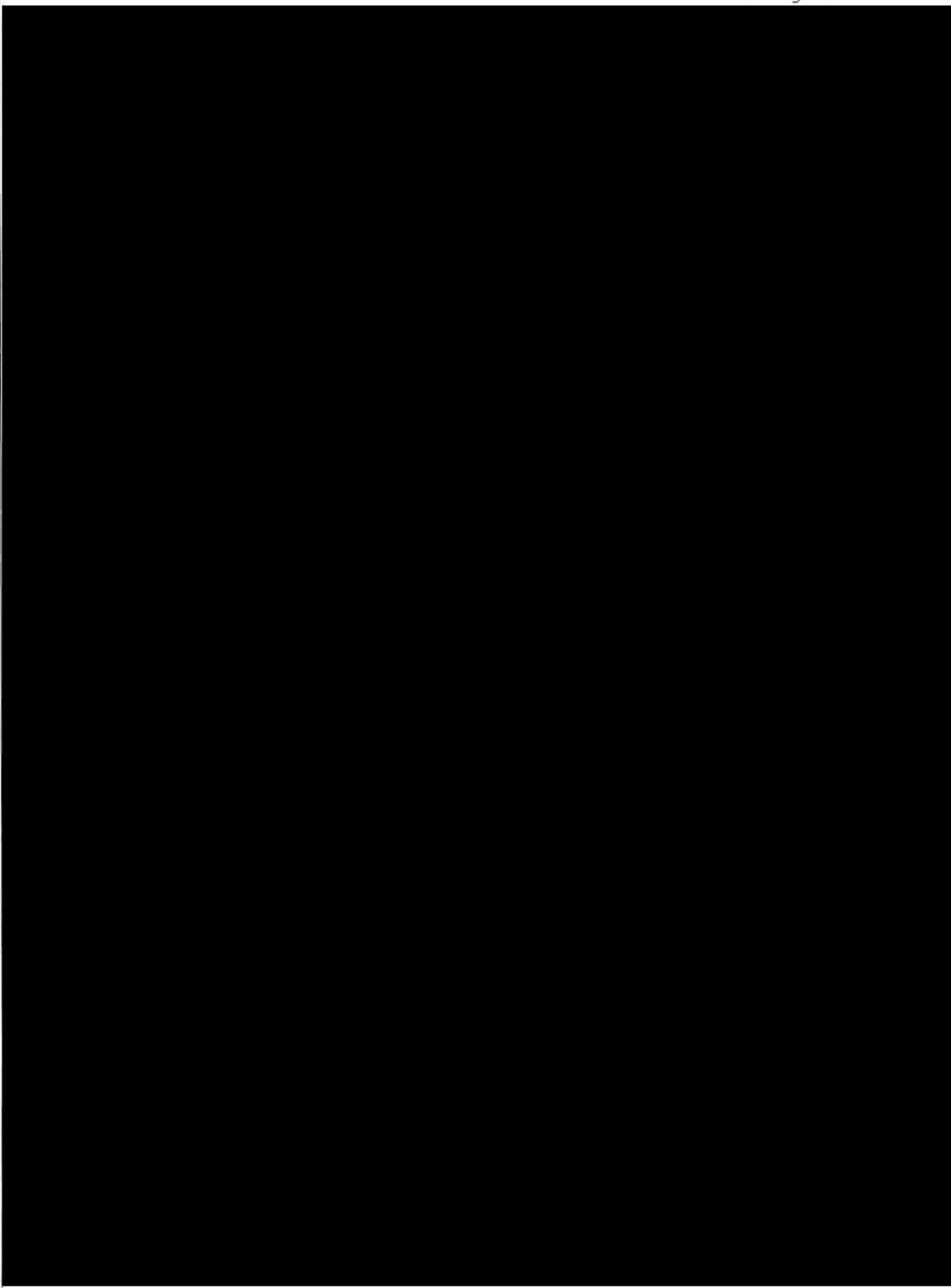
22 A. I don't remember.

23 Q. Now, if you turn to the next page.

24 A. Page 47?

25 Q. Forty-seven out of eighty-three.

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15 Q. Well, you've had this report since 2005; correct?

16 A. I've had this report since approximately that time
17 frame, yes.

18 Q. And you were happy to get this report because it
19 filled gaps in your information; correct? It gave
20 you inform you didn't have. You told me that
21 before.

22 A. The report did give me information I didn't have.

23 Q. So if you had a question on what they were talking
24 about with regard to short-air resistance time, and
25 you thought that that was a significant issue for

1 you to determine, you've had approximately 13 years
2 to try to find that out; correct?

3 A. I've had 13 years to be able to ask a question,
4 which I believe is inconsistent with the principles
5 of this report, which are to not try and go back to
6 take apart the individual processes, people, and
7 details of the manufacturing steps that led to each
8 of these pieces of data.

9 Q. Well, it says short air resistance times in seconds.
10 That wouldn't seem to be confidential information,
11 what they were talking about, would it? You
12 wouldn't have --

13 A. The details of the process used to determine this
14 information are certainly confidential.

15 Q. Right. But they wouldn't have to tell you where the
16 information was obtained from, to tell you what
17 they're talking about with regard to short air
18 resistant times, so you could compare that to what
19 you used at Taconic, would it?

20 A. I think that you are anticipating a single-number
21 representation from a distribution of properties.

22 Q. I don't think I'm anticipating anything. I'm asking
23 you the question that if you wanted to know what the
24 range of short air resistance times was to either
25 qualify for that category that they put in there is

1 as high as 54 percent, or put it outside of that
2 range, that you would be able to find that
3 information out?

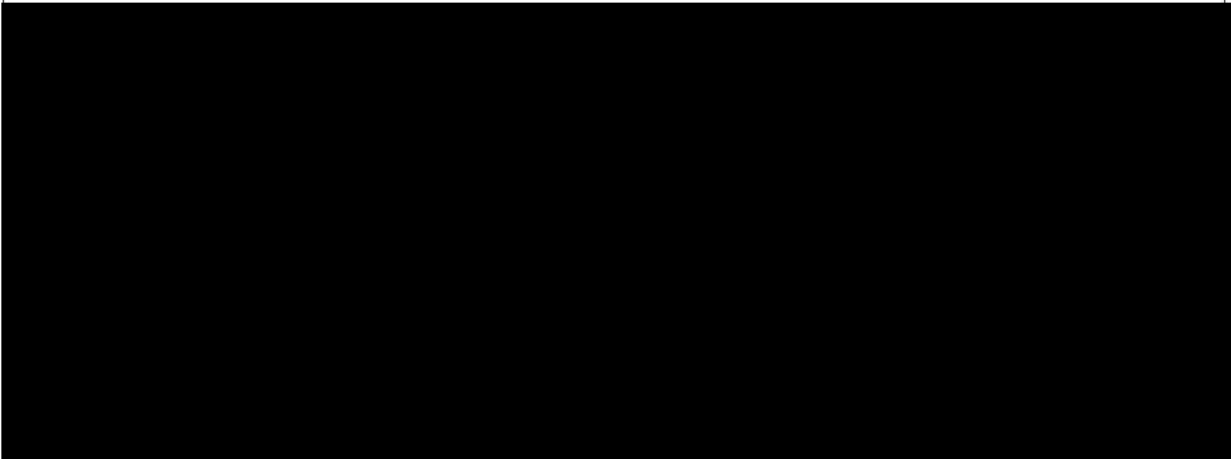
4 A. I think that would be inappropriate and against the
5 confidential principle of the -- provide for
6 the -- the organizations that provided the
7 opportunity for testing their own processes.

8 Q. So you would be unable, then, to tell whether
9 Taconic's ovens had the capacity to release
10 54 percent or didn't?

11 A. Based on the data in this report, I would not be
12 able to make that determination.

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Q. Now, between 2004, '05 and 2016, did you become aware of additional information regarding the health hazards of PFOA? Additional information you didn't have in 2004 and 2005 that you acquired over that time period, prior to 2016?

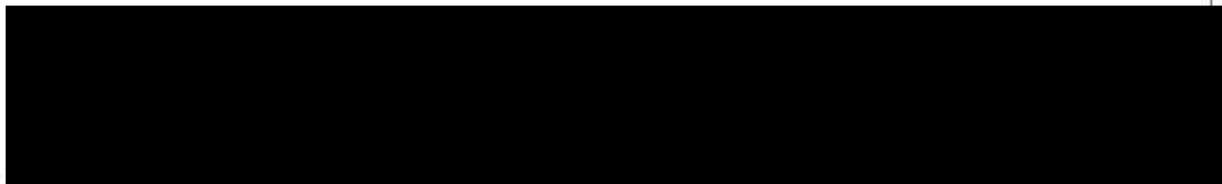
A. So I did become aware, for example, that the Science Advisory Board published a finding. My recollection sitting here at the table, is that that finding was of a likely carcinogen.

Q. And when those findings came out, do you recall any renewed discussions about expanding the scope of testing for the presence of PFOA in the drinking water in Petersburg?

A. I don't recall a discussion related to expanding the testing of drinking water. I recall a great deal of focus applied continuously to eliminating the source of PFOA.



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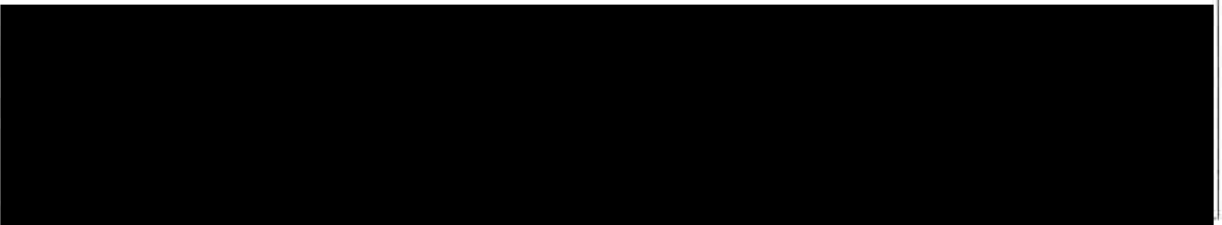
Q. All right. And did DuPont share with you at those meetings information they had obtained through studies of the health of their workers?

A. DuPont --

So I should clarify. DuPont was present at those meetings, but not the fluoropolymer manufacturing organization.

Q. Okay.

A. So DuPont also has a -- or at that time Chemours, I think now, has a -- had a pan coating operation, for example, in certain processing operations. Those individuals would have been present at the meeting, but not DuPont representatives from the manufacturing side who were most closely associated with dealing with APFO, from that part of DuPont that was dealing with an EH&S perspective. So Washington Works is not a processing facility, it's a manufacturing facility, and they would not have been present at the meetings.



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Q. So did anyone from 3M appear at your meetings to explain their experiences with their workers, with regard to PFOA exposure?

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5

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A. No, they did not.

7

Q. Did you ever have any communications with anyone from 3M about PFOA, at any point in your career?

8

9

A. Yes.

10

Q. Tell me about that?

11

A. A meeting in Ireland in June of this year, I had a conversation with representatives from 3M that included a discussion about PFOA.

12

13

14

Q. And did you talk about the health effects of PFOA with 3M?

15

16

A. No.

17

Q. Were you aware, at any point prior to 2016, that Taconic purchased pure APFO from 3M?

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19

A. No.

20

Q. When did you become aware of that?

21

A. I was never aware that Taconic purchased pure APFO from 3M.

22

23

Q. Okay. Let me see if I could be more precise. Are you familiar with the pure PFOA that's sold under brand name FC118 and 143?

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25

1 A. So I am aware of PFOA sold under those brands. I
2 don't think it's all pure.

3 Q. Okay. Is it your understanding that that
4 PFOA -- that APFO, excuse me, because that's what it
5 was, came from 3M?

6 A. It's my understanding it's manufactured by 3M.

7 Q. And sold by 3M?

8 A. Sold by 3M to someone.

9 Q. Okay. And then sold from that someone to Taconic?

10 A. So, yes, it would ultimately come to Taconic, but I
11 don't know who -- who was in that supply chain.

12 Q. Right. So it may have been given to some
13 distributor of some sort, but it originated at 3M
14 and it wound up at Taconic?

15 A. Yes, that's true.

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