

WARREN DOBSON

WARREN DOBSON, after first being duly sworn, upon his oath deposes and says:

1. That he is a resident of the County of Muskegon State of Michigan.
2. That he was employed by Hooker Chemical and Plastics Corp. (Occidental Petroleum) from June, 1970 until April, 1976; that he resigned his position with said employer because of hazardous working conditions involving exposure to the liquid and vapors of C-56 (hexachlorocyclopentadiene), and other toxic chemicals.
3. That while employed by Hooker he held the following positions:
 - (a) Fine Chemical Department: HCL operator; Photo operator; Chief Operator.
 - (b) Caustic Department: Vallex Operator and Pans Operator.
4. That he is acquainted with the properties of C-56 and he has personal knowledge as to the manufacture of the finished product as well as the disposal of the wastes produced during the production of said compound.
5. That he has personal knowledge that during the period of his employment said company disposed of wastes containing high concentrations of C-56 by dumping the same onto the ground on company premises in Montague Township, Michigan; that C-56 is highly volatile and highly toxic; that he participated under instructions from his employer, viz: Hooker Chemical and Plastics Corp (Occidental Petroleum) in the disposal of C-56 wastes by emptying the contents of the so-called "still" (known as "still-heel") into 55 gallon drums which had been opened at the top with an axe; that he witnessed said 55 gallon drums which had been filled with C-56 wastes loaded onto Hooker-owned trucks (at least one of which was not licensed to travel on public highways) and hauled to a location on Hooker's land in Montague Township northerly from the plant where, he was informed and believes, said drums filled with toxic C-56 wastes were dumped upon the land; that the contents of said drums leaked onto the surface of the ground where it was permitted to soak into the soil and evaporate into the atmosphere; that deponent is informed and believes that said toxic C-56 wastes have penetrated the soil and have entered the groundwater beneath said premises and have migrated beyond the boundary lines of Occidental Petroleum's premises and have contaminated the water table on adjoining lands.
6. That he has personally witnessed highly concentrated vapors, containing C-56 and other toxins, escaping from open drums and containers and from the surface of the ground on Hooker's premises into the atmosphere; that he has personally witnessed highly concentrated vapors containing C-56 and other toxins escaping from pipes and drains emanating from the so-called "fine chemicals" department of said Hooker plant into the atmosphere; that he was instructed by authorized employees of said company (viz, his foreman) that in the event residents of the White Lake area should complain about escaping vapors from the fine chemicals division of said plant he should act as though he thought the white vapors escaping from said pipe was steam and that he should try to convey the impression that he didn't know any toxic vapors had escaped into the atmosphere; that one such pipe was vented directly into the air over the fine chemical department. that the escape of C-56 vapors and liquids was permitted from the fine chemical department repeatedly and frequently during the time deponent was employed by said company as a routine production method.
7. That in addition to highly toxic C-56 wastes, Chlorine gas was frequently and routinely discharged from the smoke stack on Hooker premises; that sometimes the emissions from said stack were green in color - indicating a high concentration of toxic chlorine gas, and that said gas blew in whichever direction the wind may take it.

8. That chemical wastes containing high concentrations of C-56 and other dangerous chemicals were dumped onto the ground near the fine chemicals department until all the trees in that particular area died; that said dead trees were cut down, and that the area was referred to while deponent was employed at said plant as the "dead lake"; that said "dead lake" area was used as the dumping site for a large amount of wastes containing high concentrations of C-56 and other highly toxic and dangerous chemical wastes; that no effort was made to prevent said dangerous and toxic chemicals from reaching the groundwater aquifers or from evaporating into the atmosphere where said toxic chemicals could be wind-carried to surrounding populated areas.

9. That the pipes and fittings in the fine chemical department frequently leaked because of deterioration from the highly corrosive action of the chemicals produced and used in said fine chemical department and that such leakage, which included high concentrations of C-56, fell onto the floor of the building where the fine chemical department was located and that said leakage went directly into the drain where it emptied into the retention pond; that said pond was overloaded with solid material that Hooker Chemical Corp. failed to clean out with sufficient regularity to provide adequate containment and proper treatment, and that as the result of such overloaded condition of said pond, high concentrations of C-56 and sulfuric acid, along with other toxic chemicals, were discharged into the waters of White Lake.

10. That he complained frequently to his superior about the leakage of C-56 and other toxic chemicals, into the sewer and drain lines where they were discharged without adequate treatment into the retention pond and then into White Lake; he also complained about the leakage of toxic C-56 into the working area where deponent worked and from where it drained into the sewer lines and other drains; deponent pointed out that said leakage and improper discharges were dangerous, but he was told " * * * this is not a chocolate factory" and " * * * We've got to make money - we've got to make money"; that nothing was done to significantly change the procedures for manufacturing C-56 and improper disposal methods.

11. That he has personally witnessed C-56 draining through the floors above him from leaky drains and onto the floor of the operating room where deponent had to work; deponent complained to his foreman about this condition, but his complaints were ignored.

12. That frequently the so-called "spray coolers" would become clogged and required cleaning; deponent's job, among other things, was to switch over from the clogged "spray cooler" to an operable one, and the maintenance crew would drain the C-56 together with other toxic chemicals down the drain where it would become mixed with water and immediately pumped into the pond from which it would be pumped into White Lake and allowed to vaporize into the atmosphere.

13. That said company routinely had prior knowledge of inspection visits from the Michigan Department of Natural Resources.

Executed this 17 day of August, 1977.

Warren Dobson
Warren Dobson

Subscribed and sworn to before me this 17 day of August, 1977.

My commission expires:

Alvina Dahlitz

July 19, 1980

Notary Public, Muskegon County, Michigan