

In The Matter Of:

*SOUTHDOWN, INC. v.
USX CORPORATION*

*GLENN LEE
July 24, 1996*

*BAIN AND ASSOCIATES
COURT REPORTING SERVICE
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[1] IN THE UNITED STATES DISTRICT COURT
 [2] SOUTHERN DIVISION OF OHIO
 [3] WESTERN DIVISION
 [4]
 [5] SOUTHDOWN, INC.,)
 [6] Plaintiff,) CIVIL ACTION NUMBER
 [7] vs.) cv-3-93-354
 [8] USX CORPORATION,) DEPOSITION OF:
 [9] Defendant.) W. GLENN LEE
 [10]
 [11]
 [12]
 [13] STIPULATIONS
 [14]
 [15] IT IS STIPULATED AND AGREED, by and
 [16] between the parties through **their respective** counsel,
 [17] that the deposition of:
 [18] W. GLENN LEE,
 [19] may be taken before Mary Morgan, Commissioner and
 [20] notary public, State at Large, at **Bain & Associates**,
 [21] 875 Financial Center, 505 29th Street **North**,
 [22] Birmingham, Alabama, 35203, on July 24th 1996,
 [23] commencing at approximately 9:02 a.m.

[1] **IT IS FURTHER STIPULATED AND AGREED**
 [2] **that the signature to and reading of the deposition by**
 [3] **the witness is not waived, the deposition to have the**
 [4] **same force and effect as if full compliance had been**
 [5] **had with all laws and rules of Court relating to the**
 [6] **taking of depositions.**
 [7]
 [8] **IT IS FURTHER STIPULATED AND AGREED**
 [9] **that it shall not be necessary for any objections to**
 [10] **be made by counsel to any questions, except as to form**
 [11] **or leading questions, and that counsel for the parties**
 [12] **may make objections and assign grounds at the time of**
 [13] **the trial, or at the time said deposition is offered**
 [14] **in evidence, or prior thereto.**
 [15]
 [16]
 [17]
 [18]
 [19]
 [20]
 [21]
 [22]
 [23]

[1] A P P E A R A N C E S
 [2]
 [3] FOR THE PLAINTIFF:
 [4] **QUINTIN F. LINDSMITH** and **FRANK L. MERRILL**
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 [21]
 [22] VIDEOGRAPHER:
 [23] DONNA G. MARKS

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[1] I, Mary Morgan, a court reporter of
[2] Birmingham, Alabama, and a Notary Public for the State
[3] of Alabama at large, acting as commissioner, certify
[4] that on this date, pursuant to Rule 30 of the Alabama
[5] Rules of Civil Procedure and the foregoing stipulation
[6] of counsel, there came before me on July 24th 1996, W.
[7] GLENN LEE, witness in the above cause, for oral
[8] examination, whereupon the following proceedings were
[9] had:

[10] THE VIDEOGRAPHER: We now commence the
[11] deposition in the matter of Southdown, Incorporated,
[12] versus USX Corporation, case number C3-93-354, United
[13] States District Court, Southern District of Ohio,
[14] Western Division.

[15] Videotaping is provided by Donna Marks,
[16] employed at Bain & Associates Court Reporting Service,
[17] Suite 875 Financial Center, Birmingham, Alabama. This
[18] date is July 24th 1996. The time is approximately
[19] 9:02 a.m. We are located in the conference room at
[20] Bain & Associates Court Reporting. The deponent is
[21] Mr. Glenn Lee. He will be sworn, and the attorneys
[22] will then introduce themselves.

[23] THE COURT REPORTER: Would you raise your

[1] right hand.

[2] THE WITNESS: Uh-huh.

[3] W. GLENN LEE,

[4] being first duly sworn, was examined and testified as
[5] follows:

[6] THE COURT REPORTER: Do you want the usual
[7] stipulations, or do you want to state them on the
[8] record?

[9] MR. LINDSMITH: I'm happy with the usual
[10] stipulations unless you guys want to make a statement.

[11] MR. SMIGA: This is for use of trial, so all
[12] objections will apply, and as so, after I will object
[13] accordingly.

[14] MR. SHOSTAK: Set the reasons for the
[15] objection as opposed to just a straight objection?

[16] MR. LINDSMITH: However you want to do it.

[17] MR. SMIGA: State the reasons for the
[18] objection.

[19] MR. SHOSTAK: I think we need to have an
[20] actual reason so that the Court will have some notion
[21] how to rule in the event it gets that far.

[22] EXAMINATION BY MR. LINDSMITH:

[23] Q: Good morning, Mr. Lee. Again, my name is

[1] Quintin Lindsmith, and I'm one of the lawyers that
[2] represents Southdown, Inc., in a piece of litigation
[3] for which we're here today.

[4] Could you please state for the record your
[5] full name and current address.

[6] A: My name is William Glenn Lee, 1536 Greenwood
[7] Lane, Leeds, Alabama.

[8] Q: Mr. Lee, we've met once before -

[9] A: Yes.

[10] Q: - under/ similar circumstances. We had
[11] taken your deposition sometime probably a year, year
[12] and a half ago. And at that time, you sat for a
[13] deposition. Let me repeat some of the instructions I
[14] gave at the beginning of that deposition so you have a
[15] - so that you're comfortable with the ground rules
[16] h e r e .

[17] A: (Witness nods head.)

[18] Q: I will be asking you a series of questions
[19] today. And if in the course of this deposition you
[20] don't understand a question I have given you because
[21] of poor phrasing on my part or for any reason, please
[22] so indicate and I'll put the question in a form that
[23] you can answer it, all right?

[1] A: All right.

[2] Q: Also if in the course of this deposition you
[3] feel you need to look at any documents that you think
[4] might be here - and we'll be showing you some
[5] exhibits here today - again, please so indicate and
[6] I'll do what I can to help you out there, okay?

[7] A: All right.

[8] Q: And if you want to take a break for any
[9] reason, just tell us and we'll take a break. -

[10] A: (Witness nods head.)

[11] Q: You need to say yes or no for the record.

[12] A: Yes.

[13] Q: Mr. Lee, you are retired now?

[14] A: Yes.

[15] Q: And how long have you been retired?

[16] A: Since 1979, November 1st.

[17] Q: As I did before, what I'd like to do is
[18] start out with some biographical information on you
[19] beginning with the year you graduated high school.

[20] A: Graduated from high school in 1942.

[21] Q: And what high school was that?

[22] A: Leeds High School in Leeds, Alabama.

[23] Q: And then what did you do after you graduated

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[1] high school?
[2] A: I worked a short while for the Dupont
[3] Company in a munitions factory. That's in
[4] Childersburg, Alabama.
[5] Q: What did you do while you were at Dupont?
[6] A: I was a - you'll love this -
[7] dimethylaniline operator. I can't spell it.
[8] Q: I'm not sure I can repeat it.
[9] What is a dimethylaniline operator?
[10] A: It's a liquid that was used in torpedoes
[11] during World War II.
[12] Q: And as an operator, what did you do?
[13] A: My job was - I worked shift work, and my
[14] job was to keep the dimethylaniline at the proper
[15] temperature in the boiler and to run freezing points
[16] on it every hour or so.
[17] Q: Do you remember about how long you were with
[18] Dupont?
[19] A: Just a short while, just summer.
[20] Q: And then what did you do?
[21] A: Went to Auburn, went to school at Auburn
[22] University.
[23] Q: And how long were you at Auburn University?

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[1] A: Probably a quarter, sometime late - I don't
[2] remember whether we were on quarters then or
[3] semesters. But sometime around November, I left
[4] there.
[5] Q: And then where did you go?
[6] A: Went into the Marine Corps.
[7] Q: And could you describe for me the field of
[8] work you engaged in while in the Marine Corps and
[9] where you carried out your tour of duty.
[10] A: Well, I went to the Pacific. I trained in
[11] San Diego and - just a plain old grunt in the
[12] Marines. Went to the Pacific as a replacement at
[13] Guadalcanal and spent three years between there and
[14] New Georgia and New Britain and Pelalu (phonetic).
[15] And came back home in 1945, August I think it was.
[16] Q: Were you - did you work in demolitions?
[17] A: I worked in - I was in fire control the
[18] last year I was in the Marine Corps. And that
[19] included demolitions and disarming shells and bombs
[20] and this type thing, closing cave entrances.
[21] Q: And when you came back in 1945, I take it it
[22] was in that year that you were discharged from the
[23] Marine Corps?

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[1] A: Right. Then I went into - back to Auburn.
[2] Q: And how long were you back at Auburn
[3] University?
[4] A: Something less than a year. I left in the
[5] spring of - I don't remember what time it was, about
[6] maybe March or April in the spring of '46.
[7] Q: And where did you - did you go then?
[8] A: Then I got a job with Universal Atlas and
[9] went to work for them July the 1 st. I think that's
[10] wrong. I think I went to work for them July the 5th,
[11] the day after the holiday. I was supposed to go the
[12] 1st, and they put me off till after the 4th of July.
[13] Q: Where were you located when you first were
[14] employed with Universal Atlas?
[15] A: Leeds, Alabama.
[16] Q: And at what facility?
[17] A: The Leeds cement plant.
[18] Q: And what -
[19] A: Universal Atlas.
[20] Q: I'm sorry. What was your first job there
[21] with Universal Atlas at the Leeds cement plant?
[22] A: I went into explosives; I went into the
[23] quarry as explosive man.

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[1] Q: Can you describe a little bit more what you
[2] did as explosives man?
[3] A: We blasted primary holes, primary holes,
[4] which were 100 feet deep and 8 inches in diameter
[5] holes. The quarry - the quarry measured between 80
[6] and 100 feet. And I also blasted boulders, that type
[7] thing, jackhammer-type blasting and some adobe
[8] blasting, which is mud packs on the boulders with
[9] explosives in them.
[10] Q: And how long were you in that position?
[11] A: Stayed there three, three years; not all of
[12] it on that job, but I stayed at Leeds three years.
[13] Q: Did - did you have different jobs while you
[14] were there?
[15] A: Yes. They put me on a training program for
[16] supervisory work. And the last maybe two years I
[17] worked at Leeds, I - I was training to be a
[18] supervisor and probably ran about everything that was
[19] - they had there; bulldozers, shovels, whatever.
[20] Q: At the end of that two-year period, what was
[21] your position in Leeds?
[22] A: I was a - an assistant quarry foreman.
[23] Q: At the end of the three-year period that you

[1] were with Universal Atlas in Leeds, what happened?

[2] Where did you go next?

[3] A: I was transferred to, at that time, it was
[4] Osborn, Ohio.

[5] Q: Today it's known as Fairborn?

[6] A: Fairborn. They changed the name a year
[7] later, combined two small towns and called it
[8] Fairborn. Fairfield and Osborn were the two towns.

[9] Q: I didn't know that. I grew up in Dayton. I
[10] didn't know that.

[11] A: You didn't know that?

[12] Q: I did not know that.

[13] That was around 1949?

[14] A: Yes. I went there in '49, yes. I think
[15] that was maybe a year later when they made it
[16] Fairborn.

[17] Q: And you say they transferred you to what -
[18] to Osborn, later Fairborn. And what was the facility
[19] there?

[20] A: The Wabash Cement Company had quit operating
[21] there, and Universal Atlas bought the plant and were
[22] in the process of starting it up and had maybe owned
[23] it a year, somewhere like that, when I was transferred

[1] A: Yes.

[2] MR. SMIGA: I'm going to object as to
[3] leading questions.

[4] Q: Was there a time when all four of them were
[5] finally in operation?

[6] MR. SMIGA: Objection, leading.

[7] Q: You can go ahead and answer.

[8] A: Much later.

[9] Q: Much later?

[10] A: Much later, yes; when all four kilns were in
[11] production.

[12] Q: Do you remember about by when all four were
[13] in production?

[14] A: The late '50s, I guess. I don't remember
[15] exactly.

[16] Q: Do you remember - can you describe
[17] approximately when two kilns came into operation and
[18] then three kilns and then the fourth kiln?

[19] A: As best I can remember, it was about a year
[20] before the second kiln - it was ever put in
[21] production.

[22] Q: So that was -

[23] A: The third kiln, I'm not sure. It was two,

[1] there, which was October, I think, of '49.

[2] Q: Had the plant been dormant for a number of
[3] years?

[4] A: It had been dormant for several years, yes.

[5] Q: And what was the position you held when you
[6] were first transferred up there?

[7] A: I went there as quarry foreman.

[8] Q: At the time when you were transferred to
[9] what I'll call the Fairborn cement plant -

[10] A: Okay. -

[11] Q: - of Universal Atlas, how many kilns did
[12] that cement plant have?

[13] A: They had one kiln in production at that
[14] time. They had four kilns in various stages of
[15] repairs, whatever.

[16] Q: You say there was one kiln in production;
[17] were there other kilns there?

[18] A: The kilns were there physically. They had
[19] not been repaired and brought up to date.

[20] Q: And is that what Universal Atlas was doing,
[21] was in the process of repairing them and bringing -

[22] A: Yes.

[23] Q: - them up to date?

[1] maybe three years later.

[2] Q: When you first came to that facility -
[3] strike that question.

[4] In the process of manufacturing cement, is
[5] there - are you familiar with a by-product known as
[6] cement kiln dust?

[7] A: I am.

[8] Q: And could you describe generally what that
[9] is?

[10] A: I'm not a - I'm - I'm - I know what it
[11] is, but I - chemically, I do not know what it is.

[12] Q: Yeah. I'm not asking for a chemical
[13] definition.

[14] A: Okay. Kiln dust is collected, dust that
[15] would otherwise go out the smokestack in the burning
[16] process. And it's collected by some means or other
[17] and not used in production, or was not used at that
[18] time in production.

[19] Q: When you first came to the Universal Atlas
[20] Fairborn facility when the one kiln was in operation,
[21] how was the dust handled?

[22] A: The biggest part of the dust went out the
[23] smokestack and all over town. They had electronic

[1] precipitators that - I am not familiar with the way
[2] they operated. And they used those some but not very
[3] satisfactory.

[4] Q: Did they change the way that they collected
[5] the dust?

[6] A: **Yes.**

[7] Q: And what did they do to - to change the way
[8] they collected the dust?

[9] A: I don't remember the period of time, but
[10] they put in glass bag dust collectors.

[11] Q: The glass bag dust collectors collected the
[12] dust instead of it going out the smokestack?

[13] **MR. SMIGA:** Objection, leading.

[14] Q: **You** can go ahead and answer.

[15] A: Supposedly, they collected about 80 percent
[16] of the dust and - so I've been told - and collected
[17] in the glass bag dust collectors which dumped back
[18] down into a hopper for removal.

[19] Q: You don't remember exactly when they started
[20] using those; do you remember approximately when they
[21] started using those?

[22] **MR. SMIGA:** Objection, asked and answered.
[23] He already said he didn't know.

[1] Q: You can go ahead and -

[2] A: Somewhere along about the third kiln
[3] production, and I don't know when that was.

[4] Q: Okay. Now, when they started to use the
[5] glass bag dust collectors, you indicated that the dust
[6] was put into a hopper?

[7] A: The glass bags were about 15 feet long and
[8] maybe two feet in diameter or less, **round.** And as the
[9] dust **collected** on those, every so often they were
[10] wrapped mechanically and the dust fell off of the
[11] sides of the bags and down into the hopper.

[12] Q: And then what was done with the dust that
[13] was put in the hopper?

[14] A: It was hauled out into the quarry.

[15] Q: When -

[16] A: Or various places, I'll say.

[17] Q: When they first started to use the **glass** bag
[18] dust collectors, did they haul it always to the A -
[19] A-tract quarry?

[20] **MR. SMIGA:** Objection, asked and answered.
[21] He said quarry and various places, if I recall his
[22] testimony.

[23] **MR. LINDSMITH:** Please I - I'd like to be

[1] able to answer - to ask a question of clarification,
[2] which is all this is.

[3] Q: **(By Mr. Lindsmith)** Go ahead.

[4] A: We hauled - they hauled part of it to the
[5] A-tract quarry and several other places. Some places
[6] - one old gravel pit right down - almost in **Fairborn**
[7] near the school was **filled** with it. We hauled it to a
[8] trailer court, **Thomas** Trailer Court. He wanted some
[9] **fill done.** And another gravel pit which was on the
[10] Universal Atlas property.

[11] **MR. LINDSMITH:** I want to go off the record
[12] for a minute.

[13] **(DISCUSSION OFF RECORD)**

[14]
[15] (Plaintiff's Exhibit 1
[16] was marked for
[17] identification.)

[18] Q: Mr. Lee, I have put in front of you what's
[19] been marked Plaintiff's Deposition Exhibit 1, Lee
[20] Deposition Exhibit 1. I had showed this to you in our
[21] prior deposition, but we're going to do this again if
[22] you don't **mind.** This is a document that at the top
[23] says -top right-hand corner says "United States

[1] Department of Interior Geological **Survey."** And
[2] there's some handwriting on the top left-hand side
[3] that -

[4] A: Uh-huh.

[5] Q: - that you can ignore. I want to ask you
[6] some questions about this particular map and - so
[7] that as we go forward with your testimony and we talk
[8] about things about the quarry and the cement facility
[9] we can identify the locations that you're talking
[10] about from this map.

[11] Do you see at the - toward the top, about a
[12] third going across the top of the page, an indication
[13] for Interstate 70?

[14] A: **Yes.**

[15] **MR. SMIGA:** Quintin, I just want to stop a
[16] second. I want to lay an objection as to authenticity
[17] and when - the usual objections as to authenticity,
[18] no foundation has been laid, and the date of this
[19] document.

[20] **MR. LINDSMITH:** Okay.

[21] **MR. SMIGA:** It's undated.

[22] **MR. LINDSMITH:** Sure.

[23] **MR. SMIGA:** But if you want to use it, go

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[1] ahead.

[2] Q: (By Mr. Lindsmith) Do you see the

[3] indication for Interstate 70 at the top of it?

[4] A: Yes.

[5] Q: And do you see the indication for I-670

[6] where it intersects with 70?

[7] A: 675, yes, sir.

[8] Q: Yeah, 675. I'm sorry.

[9] And as you go down along the bottom third of

[10] the page, do you see an indication of the location of

[11] something called Sand Hill Road (indicating)?

[12] MR. SMIGA: Again, I want the record to

[13] reflect that counsel is showing the witness where all

[14] these roads are on the map after -

[15] MR. LINDSMITH: Well, that's why we have the

[16] videographer here, so that - that it can -video can

[17] see me doing this.

[18] A: Yes, I see Sand Hill Road.

[19] Q: You see Sand Hill Road?

[20] And over -- as you follow Sand Hill Road

[21] over toward the center of the page, do you see what is

[22] somewhat of a diagonal line that appears to be marked

[23] as Route 444?

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[1] A: Yes.

[2] Q: How long, Mr. Lee, were you at the Fairborn

[3] facility as a quarry foreman?

[4] A: From '49 to '75.

[5] Q: In view of -- as an employee for Universal

[6] Atlas?

[7] A: Yes.

[8] Q: And during that period of time, did you come

[9] - become familiar with the geography of the area, the

[10] location of the roads and the location of the physical

[11] facility in the quarry?

[12] A: Yes.

[13] Q: And in looking at this particular Exhibit 1,

[14] does that - does it appear to be a fair depiction of

[15] the location of Sand Hill Road and Route 444 and

[16] Interstate 70?

[17] MR. SMIGA: Objection. As to what years?

[18] To the whole period of time that he was there, from

[19] '49 to '75?

[20] MR. LINDSMITH: Sure.

[21] MR. SMIGA: Okay.

[22] A: Well, 70 was not there in '49.

[23] Q: Was there -

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[1] A: 675 was not there.

[2] Q: How about - let's talk about the year 1975.

[3] By 1975 was 70 there?

[4] A: 70 was there, yes.

[5] Q: But 675 was not there?

[6] A: No.

[7] Q: Okay.

[8] A: No.

[9] Q: Route 444 was there?

[10] A: Yes.

[11] Q: And Sand Hill Road was there?

[12] A: Yes.

[13] Q: Okay. Can you tell from this map - can you

[14] identify the physical location of the plant -

[15] A: Yes.

[16] Q: If you could - I'm going to hand you a blue

[17] felt tip pen. I'm going to ask you if you could

[18] circle in blue the physical location of the plant on

[19] this map.

[20] A: The whole plant?

[21] Q: Sure.

[22] A: (Indicating.)

[23] Q: And then if you could label that circle for

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[1] the record. We can just call it "the plant" and maybe

[2] indicate an arrow to it or however you want to mark

[3] it.

[4] A: (Indicating.)

[5] Q: Thank you.

[6] Now, can you identify the physical location

[7] of what was called the A-tract quarry?

[8] A: Yes. Do you want me to circle that

[9] (indicating)?

[10] Q: Please, yes, if you could.

[11] A: (Indicating.)

[12] Q: And if you could also label that in the same

[13] way that you labeled the plant.

[14] A: (Indicating.)

[15] Q: The A-tract quarry came close to, real close

[16] to Sand Hill Road down there toward the -

[17] A: Yes.

[18] Q: And between the plant and the quarry Route

[19] 444 intersected between them?

[20] A: Yes.

[21] Q: Was there a road that went from the plant to

[22] the quarry that either crossed over or went over Route

[23] 444?

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[1] A: In 1949 a railroad track went under 444 and
[2] a road went over 444 for our cement work along in this
[3] area. Our haulage was by **rail**. **After** we quit hauling
[4] by rail, this was the main road from the plant under
[5] the bridge that had been the railroad bridge to
[6] A-tract (indicating).
[7] Q: Okay. Let me get clarification on that.
[8] Initially, when cement kiln dust was hauled to the
[9] A-tract quarry -
[10] A: Uh-huh.
[11] Q: - it was done by rail?
[12] A: No.
[13] Q: I'm sorry.
[14] A: Initially, it was done by truck. But along
[15] about, I guess a couple of hundred yards east of the
[16] bridge location, the road went across 444.
[17] Q: And did that - and then it - it changed to
[18] a different location after that?
[19] A: We - as I say, when we - we hauled out
[20] there with that - I didn't **haul**. **The** operating
[21] department hauled the dust out there on that road
[22] until the railroad was removed and the road went under
[23] the bridge.

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[1] Q: Do you remember about when the railroad was
[2] removed?
[3] A: Somewhere maybe about '50 or '51.
[4] Q: Could you - let me give you a red marker
[5] just so it's easier to distinguish on the map the
[6] approximate location of the road that was used that
[7] went under the - the railroad bed by '50 or '51.
[8] A: (Indicating.)
[9] Q: What did you call that road?
[10] A: Our-haulage road.
[11] Q: Well, that's what we'll refer it in today's
[12] deposition. I'll call it the haul or the haulage
[13] road.
[14] A: Did you want me to mark that that way
[15] (indicating)?
[16] Q: Yeah, please, if you could.
[17] A: I don't know where to mark it (indicating.)
[18] Q: You can do a long arrow if you want.
[19] A: (Indicating.)
[20] Q: Okay. Having established the physical
[21] location of some of these items, now let me back up
[22] with some questions I have **generally**.
[23] When you **first** came to the **Fairborn** facility

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[1] of Universal Atlas, had there-been quarrying done at
[2] the A-tract quarry?
[3] A: Yes.
[4] Q: Are you able to describe if it had been a
[5] significant amount?
[6] MR. SMIGA: Objection, leading.
[7] A: There had been - Wabash had operated only
[8] from that quarry for the - all the years they
[9] operated, and I don't know how many that was. And we
[10] started in. **There** had been - had been some operation
[11] there before I got there, maybe a year off and on.
[12] Q: When you came there, what part of the
[13] A-tract quarry had been quarried?
[14] A: Do you want me to show you on the map? Just
[15] the - the part closest to Route 444.
[16] Q: Actually, it might be helpful if you could
[17] - I'd like the videomphmer if possible -
[18] A: I don't know if you can see it that far.
[19] Q: - to focus on the map. And, Mr. Lee, if
[20] you could point to -
[21] A: This area, this general area here closest to
[22] 444 had been quarried (indicating).
[23] Q: Okay. **Thank** you.

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[1] I don't believe I asked you - you indicated
[2] that you were the quarry foreman -
[3] A: Yes.
[4] Q: - for the **Fairborn** facility.
[5] I didn't ask because I think I probably
[6] know. What were your duties as quarry foreman?
[7] A: When I first came to the **Universal Atlas**
[8] plant, my duties were to drill, blast, load onto
[9] railroad cars and haul into the crusher, crush and put
[10] into the storage limestone for the Universal Atlas
[11] plant and to haul - we designated it as clay, which
[12] was high silica topsoil that was used in the mix. It
[13] was hauled and stockpiled near the plant facility.
[14] And to maintain all of the equipment used in this
[15] operation.
[16] Q: As quarry foreman, did you supervise a staff
[17] of - of quarry men?
[18] A: Had about 30 men originally, about 6 or 8 of
[19] whom were track maintenance men, railroad track
[20] maintenance.
[21] Q: Over the period of your employment with
[22] **Universal Atlas**, were there other people also
[23] designated as quarry foremen?