

1 Q Dr. Zhang didn't seek out ChemRisk to do a
2 follow-up, did he?

3 A No.

4 Q You sought him out, didn't you?

5 A I did.

6 Q Did he express some surprise when he was
7 notified by you at the outset?

8 A I don't know.

9 Q He'd been investigating this Chinese population
10 and the chromium problem there for about 20 years,
11 right?

12 A Well, in the past he had done it. He was
13 retired, as far as I understand.

14 Q But didn't he follow that population for about
15 20 years?

16 A Probably somewhere in that range. It
17 stopped -- stopped probably in the mid-'80s.

18 Q And when you had these conversations with him,
19 did you ever tell him hey, by the way, we at ChemRisk
20 are consultants to PG&E who's involved in litigation
21 arising out of a contamination at Hinkley with chromium
22 contamination up to 20 parts per million?

23 A I don't recall if we did or not. Tony, again
24 being the translator, would probably have a better
25 recollection of what he -- what he said that was

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1 understandable to Dr. Zhang. But if I did say that on
2 the -- on a telephone conversation, Tony, I'm sure,
3 would have translated it, but I just don't recall.

4 Q So you don't recall whether you asked Tony Ye
5 to translate that for Dr. Zhang; is that right?

6 A No. My recollection is that we -- we indicated
7 we had an interest in understanding the health effects
8 of hexavalent chromium in groundwater and I don't -- I'm
9 not -- I don't think that it would be of particular

10 interest to him to know the name of the company that

11 was -- that was in litigation about it or that it was

12 particularly in litigation. He just -- we were asking

13 for his scientific advice and he -- he offered to -- to
14 permit us to -- permit us access to that advice.

15 Q So are you saying that you didn't inform
16 Dr. Zhang that ChemRisk was a consultant to PG&E, which
17 was a party involved in chromium contamination

18 litigation?

19 MR. McLEOD: Asked and answered.

20 MR. WILKINSON: Objection. Asked and answered.

21 THE WITNESS: No, I'm not saying that.

22 BY MR. PRAGLIN:

23 Q You just don't remember one way or another; is
24 that right?

25 A My expectation is that we told him we were

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1 interested in understanding chromium (VI) in groundwater
2 and its health effects. And I don't recall if I said
3 "PG&E" or "litigation" with regard to our interests.

4 Q And you didn't think that ChemRisk's
5 relationship to PG&E or the fact that PG&E was involved
6 in chromium litigation involving a similar contamination
7 to that which Dr. Zhang had been studying for 25 years
8 was something that Dr. Zhang would have liked to have
9 known?

10 MR. WILKINSON: Objection. Calls support
11 speculation.

12 MR. McLEOD: Absolutely.

13 THE WITNESS: I don't know.

14 BY MR. PRAGLIN:

15 Q It didn't seem important to you to disclose to
16 Dr. Zhang?

17 A Well, I can tell you from my history and I
18 think a document refreshed my memory from what I
19 reviewed in this -- in this production, that when we had
20 an interaction with either the Chinese or the Mexican
21 authors and there was a query about well, why do you
22 care or why are you interested, that we did fully
23 disclose what it was that -- that we were doing and --
24 doing and why it was that we were after this
25 information.