

1 think there was an expectation and we never advised
2 PG&E's attorneys that there was an expectation that the
3 publication would precede any testimony in the -- in the
4 arbitrations.

5 Q You read the Blue Ribbon Panel report, didn't
6 you?

7 A Actually, I didn't. I read -- I read just
8 portions that -- draft chapters that Dr. Paustenbach
9 sent me. And he did E-mail me the final report but I
10 didn't read it.

11 Q Did you know that the Blue Ribbon Panel report
12 cites as a reference to the Zhang '97 article?

13 A That wouldn't surprise me but I didn't --
14 again, what -- I know that that's probably true based on
15 what I've read in the other people's depositions, but I
16 didn't read that myself.

17 Q Why wouldn't it surprise you that the
18 Blue Ribbon Panel report would cite to the Zhang '97
19 article?

20 A Because it's an important piece of literature
21 with respect to ingestion carcinogenicity of chromium.

22 Q Is it any more important than any other piece

23 of scientific literature out there in the published
24 literature about ingestion of carcinogenicity of
25 chromium?

165

1 A In a way it is, yes.

2 Q Why?

3 A Because it's really the only epidemiology
4 treatment that's out there in the literature of a
5 groundwater contamination plume and its potential cancer
6 effects in a population.

7 Q Was there some discussion with PG&E's counsel
8 about the fact that this was a very important piece of
9 scientific literature about ingestion of chromium and
10 carcinogenicity?

11 A I think I told you earlier that the judges from
12 the first arbitration actually mentioned that to the
13 PG&E attorneys, and they relayed -- related that to us.

14 Q So did the PG&E attorneys emphasize the fact
15 that they thought it was important because the judges
16 found it important?

17 A I think they took the judges' advice.

18 Q And that was communicated to you at ChemRisk?

19 A Yes.

20 Q Are you familiar with the concept of
21 transparency of authorship in scientific literature?

22 A I'm not sure exactly how you're using it but
23 I'm -- I'm familiar with the term "transparency."

24 Q What does it mean?

25 A Well, it means putting all -- all of the