

## Qarmat Ali Water Treatment Plant Environmental Issue

- On Wednesday August 6<sup>th</sup>, Ray Garcia (Medical Administrator) and I (Johnny Morney, HSE Manager for the South) were in route to the EPG facility when Ray received a phone call from Chuck Adams (HSE Manager for Team RIO). Chuck informed Ray of a situation at the WTP. Apparently, Ed Blacke (HSE Coordinator) called Chuck to advise him that 60% of the WTP workforce were displaying symptoms consistent with those associated with being exposed to the chemical Sodium Dichromate. Chuck requested Ray and I redirect and get to the WTP ASAP to assess the situation. Being unfamiliar with the chemical I called Will Van Ostrand (HSE Manager for training audits) to gain some insight on Sodium Dichromate. Will read the MSDS to me over the phone. Upon arriving at the WTP Ray and I met with Daniel DeMoss acting construction supervisor. I asked Daniel to have the individuals with concerns about Sodium Dichromate to meet us in the first aid office. Approximately seventeen (17) employees showed up to voice their concerns. I started a sign in sheet to ensure that we would be able to follow up with the employees at a later date. The employees started the meeting by stating that they had medical issues due to being exposed to Sodium Dichromate. I informed them that on the drive over to the WTP was the first time I ever heard mention of Sodium Dichromate being onsite. One of the employees mentioned that the MSDS sheet he originally received did not make reference to Sodium Dichromate being a carcinogen. They commented that management was aware of the problem because of an email they read. Not being aware of any email addressing Sodium Dichromate, I began to question them about said email when Daniel DeMoss retrieved a copy for me to review. The email was originated by Kish Atit on Sunday, July 27, 2003, and forwarded by Kailash Singal on Monday, July 28, 2003. It was addressed to Jack Loveladdy, Herbert E. Myers, Ed Reyes and Mark Daniels. It was carbon copied to Young Lee, Chuck Adams and Bruce Habel. The email basically warned everyone to stay away from the chemical feed tanks containing sodium dichromate. After reading the email, I asked Ed Blacke if he knew about the email. Ed said he received a copy of the email from Chuck Adams on the day before. I then apologized for my not being made aware of the email and I told them I would work on the communication break down in our department. I instructed the employees that the building mentioned in the email where the tanks were located was now off limits to all KBR employees and subcontractor employees. The only exception would be to employees wearing the proper PPE listed on the MSDS for Sodium Dichromate. I contacted Herb Myers the Construction Manger to inform him of the restrictions. Herb agreed. I also told Herb and the employees that we would take samples of the soil along with air monitoring. Ray Garcia told the employees about the KBR Medical Surveillance Program.

**PLAINTIFF'S  
EXHIBIT**

CONFIDENTIAL - SUBJECT  
TO PROTECTIVE ORDER

R/LANG 04063

I returned to Kuwait City and informed Chuck Adams of the potential problems. Chuck and I immediately contacted John Waterous and Rod Kimbro of the Environmental Dept. to request their assistance with collecting samples.

After getting a commitment from the environmental guys, I contacted Dennis Bagnocche (HSE Manager Corporate) and Dr. Sudhir Desai (HSE Industrial Hygienist Corporate) to get guidance on the sampling.

- On Thursday, August 7, 2003 I met Rod Kimbro at BIA (Bashra International Airport). From BIA we traveled to the WTP where he collected several soil samples. While at the WTP, I was approached by Leon Cater (Construction Supervisor at the WTP). Leon stated to me that he thought the safety dept. was supposed to be a part of the solution not the problem. I asked Leon what he meant by the statement. He said this was his first day back from R&R. He went on to say that Ed Blacke (HSE Coordinator at the WTP) greeted him the muster point (mile marker 60.5) that morning with a copy of the MSDS on Sodium Dichromate. He stated Ed continued the conversation with him and several other employees, about how management was putting them in danger. Leon asked me to have a talk with Ed about handing him a MSDS and working to correct the situation not perpetuate it. In Leon's opinion Ed's statements were totally untrue.

Leon did not want to be present when I spoke to Ed. Due to the sensitivity of the issue, I asked James Sheffield (Construction Supervisor) to be present when I spoke with. I thanked Ed for doing a good job of getting warning signs posted to warn employees of the potential chemical hazard. I then asked him not to hand out anymore MSDS's but instead to direct any one wanting or needing copies of MSDS's to the safety office to ensure we would give them the most up to date version. Ed said he did not give anyone a copy. I again thanked Ed for his help and asked him to let the environmental and industrial hygiene folks handle it from this point on.

- On Friday, August 8, 2003, Chuck Adam's chaired a meeting to formulate a path forward. The attendees were C.W. Adams, Rod Kimbro, Young Lee, Leon Cater, Will Van Ostrand, Rob Hall, Frank Luce, Mike Sumpter, Herb Myers, Greg Althaus, Johnny Morney, John Waterous, K. Singal, and Kish Atit. Leon Cater (Construction Supervisor) started the meeting by stating that the environmental issue has existed from day one of the WTP project. He also said an environmental technician identified the chemical in May. The temporary solutions proposed were:

- Set up a decontamination station where people can wash and change clothes.
- Spray a chemical that would slowly stop the residue from being dusted.
- Gravel the surface around all working areas.
- Use heavy oil that will crust over the surface

- On Saturday, August 9, 2003, I accompanied Rod Kimbro (environmental technician) back to the WTP to collect additional soil samples as well as one air sample. I also took numerous Tyvek suits, monogoggles, and half masked respirators and delivered them to the Halliburton employees working at the WTP. I informed the Halliburton employees of the potential hazard and the methods we were using to mitigate the hazard. I spoke with Ed Blacke to advise him that I would be moving him to the I PG plant. He asked why. I explained to him that due to extreme hazards of bringing the facility online we needed a safety presence to assist with start up.

Later that evening I was in the safety office, when Chuck Adams called me over to his desk where he and Ed Blacke were having a conversation. Chuck informed me that Ed had tentured his resignation and wanted to leave for home as soon as possible.

- On Sunday, August 10, 2003, Ray Garcia and I were working in the safety office when Ed Blacke came in requesting to be taken to lab to be tested. Ray told Ed that the test required that he fast for twelve (12) hours prior to taking the test. Ray and Ed agreed to the test on Monday morning.
- On Monday, August 11, 2003, I received a phone call from Ray Garcia (Medical Administrator) in which Ray informed me that Ed Blacke refused to submit a blood sample. Ray put Ed on the phone. Ed told me that in his opinion the facility was substandard. He went on to say that he would contact the KBR office in Houston and make arrangements to get the test done in Phoenix, AZ. I asked Ray if he could take Ed to one of the US military facilities to have the samples taken. Ray stated he made that suggestion to Ed, but he was not willing to give a sample. I advised Chuck Adams on the events. Chuck said he would call Rick Hopper (SR, HR Manager) to get instructions.