Exhibit 8

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, et al., Plaintiffs, vs. MONTROSE CHEMICAL CORPORATION OF CALIFORNIA, et al., Defendants.	Case No. CIV 90 3122-R VOLUME I
AND RELATED COUNTERCLAIMS, CROSS-CLAIMS AND THIRD-PARTY ACTIONS	

RULE 30(b)(6) DEPOSITION OF JEFFREY A. DHONT, a witness herein, taken on behalf of the defendants, at 8:35 a.m., Monday, May 22, 2000, at 505 Montgomery Street, Suite 1900, San Francisco, California, before Georgette L. Urbano, CSR, RPR, pursuant to notice.

REPORTED BY:

Georgette L. Urbano,
CSR 8747
Our File No. 3-64947

1 Q When did you work on the Firestone site?
2 A My recollection is it was during the time that
3 I was working on FMC.
4 Q During the same 1988 to 1989 time period?
5 A Approximately.
6 Q What was the next site after the Firestone
7 site?
8 A Indian Bend wash site.
9 Q Where is that located?
10 A It's located in Tempe, Arizona.
11 Q What were the contaminants of concern?
12 A The contaminants of concern were volatile
13 organic compounds.
14 Q Was there a ROC signed of that site while you
15 were RPM?
16 A No.
17 Q During what years did you serve as RPM for the
18 Indian Bend wash site?
19 A From approximately 1990, perhaps a little
20 slightly before that, until 1994.
21 Q Why did you cease to be the RPM for the Indian
22 Bend wash site?
23 A I changed positions to work on the Montrose
24 chemical site and Del Amo sites, Montrose Chemical and
25 Del Amo sites.

1 Q And that began in 1994?
2 A Yes.
3 Q Do you recall what month?
4 A It was approximately November of 1994.
5 Q And you still are the RPM for the Montrose
6 site?
7 A I am one RPM that works on the site, yes.
8 Q Who are the other RPMs that work on the site?
9 A Presently, Fred Schauffler.
10 Q Anyone else?
11 A Presently, occasionally Dante Rodriguez.
12 Q Anyone else?
13 A No.
14 Q You use the term "Montrose Chemical site."
15 Where are the properties that you're referring to?
16 A I am not necessarily referring -- well, I'm
17 not referring merely to a property or set of properties
18 but to all locations contamination has come to be
19 located as a result of the operations of the Montrose
20 Chemical California plant in Los Angeles, near Torrance.
21 Q Would you please identify each of those
22 properties that you're aware of.
23 A I can identify the properties of the Montrose
24 plant. That includes the property originally owned by
25 Stauffer Chemical, the property on which Montrose

1 Chemical operated at 20201 Normandie. The property
2 presently occupied by Jones Chemical Corporation, the
3 Normandie Avenue ditch, the L.A. DWP. That's Los
4 Angeles Department of Water and Power.
5 The property immediately south of the
6 properties previously mentioned, that includes the storm
7 water pathway, meaning --
8 Q I'm sorry. Did you say that includes -- are
9 you saying that the Los Angeles Department of Water and
10 Power property includes the storm water pathway, or what
11 were you -- what did you mean to refer to?
12 A I meant to continue my list.
13 Q Okay. Go ahead, then.
14 A It includes properties within the storm water
15 pathway that include contaminants from the Montrose
16 property. I am not able to identify by parcel all such
17 properties, but that includes properties along the
18 former Kenwood ditch and the pathways, storm water
19 pathways leading to it.
20 It includes the former slough that that
21 pathway emptied into. It includes the former -- the
22 drainage leading from that slough to the Dominguez
23 Channel. It includes the Dominguez Channel, the
24 consolidated slip, the Los Angeles Harbor.
25 It includes the present day Kenwood drain. It

1 includes the present day Torrance and previous and
2 historical Torrance lateral. It includes all properties
3 sitting on or above the groundwater -- contaminated
4 groundwater plume.
5 It includes any properties that have received
6 contaminated soils or have contaminated soils from the
7 Montrose property. It includes the sanitary sewer
8 system that received wastes from the Montrose property.
9 It includes the Palos Verdes Shelf and any other
10 location or contamination that's come to be located from
11 the Montrose property.
12 Q Well, do you know of any other location?
13 A DDT has been detected on the Farmers Brothers'
14 property; therefore, I would include that. It would
15 include industrial properties to the -- primarily to the
16 east or west of Montrose where DDT has been detected. I
17 believe I mentioned, but just for clarity, any
18 residential areas where DDT has been detected.
19 Q Anywhere?
20 A From the Montrose plant.
21 Q That was the question. Which ones are from
22 the Montrose plant in your belief? DDT's detected in
23 most areas of the United States, in fact, most of the
24 world. So which ones do you attribute to the Montrose
25 plant?

1 A EPA has not made a determination as to exactly
2 which properties, all such properties.
3 Q Which ones do you know of?
4 MS. WISE: Objection. Vague.
5 Q BY MR. RAUSHENBUSH: You said DDT has -- EPA
6 has not made a determination as to all such properties.
7 Which ones do you know of?
8 MS. WISE: Objection. Vague.
9 THE WITNESS: Can you clarify your question.
10 Q BY MR. RAUSHENBUSH: Yes, sir. You indicated
11 that the EPA believes that certain properties have DDT
12 found in their soil because it came from the Montrose
13 plant; correct?
14 A No. What I said was your original question
15 was which -- your original question was what properties
16 do we or would EPA consider part of the Montrose
17 chemical Superfund site. And what I was saying was any
18 properties that have received or where contamination has
19 come to be located from Montrose. You then asked me to
20 try to enumerate all those properties.
21 Q Is that your answer?
22 A (No response.)
23 Q Let me ask another question, then.
24 I understood what your answer was. Now I've
25 asked you to please enumerate the properties that EPA

STATE OF CALIFORNIA

I, Georgette Urbano, CSR No. 8747, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place named therein and was thereafter transcribed under my supervision; that this transcript contains a full, true and correct record of the proceedings which took place at the time and place set forth in the caption hereto.

I further certify that I have no interest in the event of this action.

EXECUTED this 12th day of June, 2000.

Georgette A. Urbano

GEORGETTE URBANO