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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL CIVIL WEST

ADELINO ACOSTA, et al.,)
)
Plaintiff,)
)
vs.) Case No.
) NC053643
SHELL OIL COMPANY, et al.,)
)
Defendants.)
_____)

Videotaped deposition of ALFRED VOLLMER,
taken before Christianne Lee Fong, CSR 7559, CCRR, a
Certified Shorthand Reporter for the State of
California, with principal office in the County of
Los Angeles, commencing at 10:21 a.m., at Dole Food
Company, Inc., One Dole Drive, Westlake Village,
California.

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21 Also Present:

21

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22

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25

1 Q Vern Howland?

2 A Vern Howland, yes.

3 Q Did you witness this? You watched it?

4 A Yeah. Yeah. Kind of be down on the bottom.

11:23 5 There towards the end, like I say, they started doing
6 that when I was finishing up. So I kind of look back and
7 was watching. And you're making sure that it's going to
8 work the way you hope it works.

9 Q How did the concrete from the walls get spread
11:23 10 out?

11 A With the dozer. The dozer would bring it down,
12 and they worked off in sheets. And they were pretty --
13 well, like when we're working on the floor, you always
14 had to contend with the machines being on the floor and
11:24 15 working in with the dirt and the sub -- subsurface,
16 whereas on the wall, they could pretty much clean the
17 wall off without taking too much dirt with it. And that
18 gave you more of a opportunity to work the concrete,
19 break up the concrete because there's more space
11:24 20 available, if you understand what I mean there.

21 But you would flop it over on the bottom, and it
22 would break up going over and everything. But mostly
23 when you got it down on the bottom, then you take --
24 dozed it out and ran over it and had the other machine
11:24 25 run over it, and it would break up pretty well that way.

1 the vibratory one, but it didn't have that shaking effect
2 on it. But it would work on sheer weight, and it had
3 prongs on it.

4 If you ever -- I don't know if you ever dug a
11:33 5 posthole or something, then you had to fill it in;
6 sometimes you take the other end of your shovel and just
7 start jabbing it in around the posts just to make the
8 dirt go down deeper.

9 This is the way the sheepsfoot -- they call them
11:33 10 a sheepsfoot -- worked on it. They cut it in. Whereas a
11 normal solid rolling ball would roll over the top, but
12 the sheepsfoot would push in even a couple of more
13 inches, which tightens it up much more.

14 Q Did you ever see the soils engineer take
11:33 15 compaction tests in the field?

16 A Yeah. Yeah, he would take them. He was taking
17 them all the time.

18 Q When you were ripping the concrete and flooring
19 in Reservoir No. 6, were you ever able to get a look at
11:34 20 the dirt underneath the floor?

21 A Yeah. Because when we would rip, you know, it
22 wasn't like it was cutting a pie. It would rip and it
23 would jumble up and break apart. And you'd look down
24 underneath there, and certainly where the ripper went
11:34 25 through, there was always a little furrow so you could

1 see the subsurface really quite well.

2 Q Did you ever see any oil under there?

3 A No, never did.

4 Q Did you ever see any evidence that there had
11:34 5 been oil sludge on top of the floor at the time that you
6 did any ripping?

7 A No. Never did. Never did. That was what we
8 would look for. We just assumed that -- well, when they
9 had the fatality there and it was a few years prior, then
11:35 10 that's when they started cleaning everything out. We
11 just assumed that, well, everything had dried up when
12 they cleaned it out. They were under a lot of pressure.

13 Q Did you continue to work at Carousel until the
14 grading work was complete? The rough grading?

11:36 15 A Till the rough grading was complete, yes.

16 Q At the time that you left Carousel, did you
17 believe that the site was contaminated in any way?

18 A No.

19 Q Did you have any knowledge or belief that there
11:36 20 was oil contamination located beneath the tank bottoms?

21 A No. Before I came in, I thought there might be.
22 But no, working there.

23 Q Did you have any knowledge or belief that oil in
24 the environment was harmful to humans in the 1960s when
11:36 25 you were doing this work?

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STATE OF CALIFORNIA)
) SS.
COUNTY OF LOS ANGELES)

I, Christianne Lee Fong, CSR 7559, CCRR, a certified shorthand reporter in and for the county of Los Angeles, State of California, do hereby certify;

That ALFRED VOLLMER, the witness named in the foregoing deposition, was, before the commencement of the deposition, duly administered an oath in accordance with CCP 2094;

That said deposition was taken down in stenograph writing by me and thereafter transcribed into typewriting under my direction.

I further certify that I am neither counsel for nor related to any party to said action, nor in anywise interested in the outcome thereof.

Dated this 16th day of January, 2014.

CERTIFIED SHORTHAND REPORTER
IN AND FOR THE COUNTY OF
LOS ANGELES
STATE OF CALIFORNIA