Transcript of the Testimony of VALERIE J. HARWOOD, Ph.D.

1/29/2008

W. A. DREW EDMONDSON, et al.
vs.
TYSON FOODS, INC., et al.

4:05-CV-00329-TCK-SAJ

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his capacity as ATTORNEY GENERAL OF THE STATE OF OKLAHOMA and OKLAHOMA SECRETARY OF THE ENVRONMENT C. MILES TOLBERT, in his capacity as the TRUSTEE FOR NATURAL RESOURCES FOR THE STATE OF OKLAHOMA,	)
Plaintiffs,	)
vs.	)4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,	)
Defendants.	)

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THE VIDEOTAPED DEPOSITION OF VALERIE J. HARWOOD, Ph.D., produced as a witness on behalf of the Defendants in the above styled and numbered cause, taken on the 29th day of January, 2008, in the City of Tulsa, County of Tulsa, State of Oklahoma, before me, Bonnie Glidewell, a Certified Shorthand Reporter, duly certified under and by virtue of the laws of the State of Oklahoma.

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unreliable?
A Again, that depends on who you talk to, there's certain, certain methods that people published that others don't think work very well. So -- or that don't work well in their hands or in 12:11PM
their lab or in their region. So one of the things Don Stoeckel, who's another SMT expert, and I published a paper in 2007, a critical review of microbial source tracking. One of the things we emphasized is that the method that is used needs to 12:11PM
be validated in the time and space where the method is being utilized. So I wouldn't so as much say that any given methods have been thrown out as we become aware of how we need to validate them and the limitation that is they have in particular areas 12:12PM
they may be more useful in one situation versus another.
Q How have you become aware of the need to validate new methods?
A There have been a lot of -- there have been 12:12PM
several studies done where method comparison studies, where one would actually test the performance of methods, head to head, or provide, you know, blind samples to laboratories. And that was -- those are some of the ways that we became 12:12PM

more and more aware of the need for validation methods.

Q Was the need for validation that some of the methods weren't working as well as had been previously thought? 12:12PM

A Well, again, so you're talking about the time and space where the study was conducted, so what may have worked well in one area didn't necessarily work well in another. Or what worked with one type of animal population would not work well with other 12:13PM types of animal populations and watersheds.

Q I think I saw one study where scientists involved in microbial source tracking were invited to participate in a test to see if their -- to see if their methods worked. 12:13PM

A Uh-huh.

Q And if I understand it right, the experts that were putting forward their methods thought that their methods had reliability of 60 to 90 percent, but then when the test was actually done and the 12:13PM results were unveiled, the reliability was 20 to 30 percent; are you familiar with that?

A Well, you know I am; it was my paper.

Q It was a well written paper, too. Tell us about that. 12:13PM