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UNDER OATH DEPOSITION OF STAN HAZAN
DATED: March 10, 2004

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4 BY MR. NORDREHAUG:

5 Q. Good afternoon, Mr. Hazan, I appreciate your
6 coming to the office for your deposition. I'm Kyle
7 Nordrehaug. I represent the plaintiffs in this case.

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17 Could you state your name for the record.

18 A. Stan Hazan.

19 Q. And with whom are you employed currently?

20 A. NSF International.

21 Q. How long have you been employed by NSF
22 International?

23 A. Fifteen years.

24 Q. Okay. And what is your position there?

25 A. Currently I am the executive director for the

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1 Center for Public Health Education --

2 Q. Okay.

3 A. -- which is the training and education arm of
4 NSF.

5 Q. Okay.

6 A. And what does the -- I'm sorry -- training and
7 information branch, did you say?

8 A. Center for Public Health Education.

9 Q. What is their function generally at the
10 NSF International?

11 A. To provide training and education in standards,
12 testing, variety of food safety issues, and we're else
13 responsible for the conferences and seminars that NSF
14 puts on.

15 Q. Okay. And is that just with respect to water
16 additives or substances other than water additives?

17 A. Substances other than water additives as well.

18 Q. Okay.

19 A. So --

20 Q. But water additives would fall within

21 that --

22 A. Correct.

23 Q. -- within your sphere of what you do at

24 NSF International?

25 A. Yes.

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8 Q. Okay. Now, if I could ask you, what is your
9 educational background?

10 A. I have a degree in chemistry and biochemistry
11 from the University of Toronto.

12 Q. Okay.

13 A. And an MBA from the University of Michigan.

21 Q. Okay. I want to ask you a little bit --
22 you've been designated as an expert in this case. And
23 if I could just ask you how you've been designated and
24 if I could -- it says here that Stanley Hazan will
25 testify regarding the scope of NSF ---.

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1 standards 60 drinking water chemicals health effects.

2 Is that something you are going to -- you

3 intend to give an opinion on in this case?

4 A. Yes.

5 Q. Okay. And I'll get to the substance of your

6 opinions.

7 A. Okay.

13 Q. It says you're also going to testify regarding

14 the NSF certification procedures.

15 Is that another matter you're going to give an

16 opinion on in this case?

17 A. Yes.

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13 Q. Okay. So 3.2.1 has not been applied in the

14 case of HFSA? Are you aware?

15 A. I'm rereading the question. I want to see if

16 the reference is still current. Because that's a 1999

17 standard. 342. The current requirements, general

18 requirements of the 3.2, which is 3.2.1 specifically,

19 manufacturer shall submit at a minimum the following

20 information for each product, a proposed maximum use

21 level for the product which consistent with requirements

22 of an exhibit *[SFPLT/]. A complete formulation

23 information which includes the composition of the

24 formulation. The reaction mixture and that's if

25 applicable. Chemical abstract number, chemical name

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1 supplier for each chemical present in the formulation.
2 A list of known or suspected impurities within the
3 treatment chemical formulation and the maximum percent
4 or parts by weight of each impurity. Description or
5 classification of the process in which the treatment
6 chemical is manufactured, handled and packaged. And
7 then there are a couple more selected *spectra and then
8 when available list published and under published tox
9 studies relevant to the treatment, et cetera.

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5 so my question is, is HFSA one of those products?
6 A. HFSA is one of the products listed in the
7 standard that has designated contaminants to be tested
8 for.
9 Q. Okay. But does it have -- prior to approving a
10 manufacturer, does NSF require the manufacturer to
11 provide a list of published and unpublished
12 toxicological studies relevant to HFSA and the chemical
13 * impurities present in HFSA?
14 A. I would say that the HFSA submissions have not
15 come with the tox studies referenced.
16 Q. Okay.
17 A. However, that is -- since that is not my
18 department, I probably should defer that to the people
19 in that department.
20 Q. Okay.