Affidavit

I, Joseph NADEAU, do hereby state and depose:

...und Records Center
...E: Centredale Manor
BREAK: 10.4
OTHER: 25920

1. I was employed by New England Container and Metro-Atlantic from 1962 until 1965. I worked part time during the summers of 1962, 1963, and 1964 and became a full time employee in 1964 and 1965. I worked at both facilities as did some of the other employees, who were interchangeable between New England Container and Metro-Atlantic.

2. At New England Container, I loaded clean barrels onto trucks, unloaded incoming barrels from trucks, and loaded barrels onto the conveyor, which fed the barrel furnace.

3. Reconditioned barrels were sold to Metro-Atlantic, sold to New England Container's customers, or sold as burn barrels, barrels used to burn mainly household waste.

4. Incoming barrels were stored on the ground at New Container. Some of them contained dyes or emitted a chemical odor. The materials in these barrels leaked onto the ground around the plant. A large amount of these barrels contained various types of resins. I would buy new work clothes and shoes on a weekly basis, due to the amount of waste

materials that would contaminate on my clothes and shoes while working in the area in and around the facility

5. At the barrel furnace, the barrels were placed upside down and open on the conveyor belt. This allowed any sludge or liquid, remaining in the barrel, to drain into a pit below the conveyor.

6. At Metro-Atlantic, I was involved in the production of Reserve Salt, which was a type of metal stripper that contained a mixture of sulfuric acid, sulfan, caustic, water, and other materials. It was mixed in 5,000 gallon tanks, which were 8 to 10 feet high, and then cooked under pressure. After it had been cooked, it was filtered through a series of canvas filters. Dripping from the filters were recycled. What remained in the tank was a black sludge, which was dumped from the tank onto the floor of the plant. It was then shoveled into barrels, filling three to four 55 gallon barrels, and the remaining material was hosed into floor drains, which drained into the canal on the left side of the building. Metro-Atlantic used to make 2 to 3 batches of Reserve Salt each week.

7. Sulfan, a product used in the making of Reserve Salt, would burn holes in the worker's skin. The kettle, used to make Reserve Salt, was made of stainless steel with stainless steel paddles, because the Reserve Salt quickly "rotted out" ordinary steel.

8. Metro-Atlantic also made a product called [illegible]pel, used in water-proofing. It was a mixture of wax and fish oil (N-Methol-Taurine).

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 20th day of January 2001.

Martin J Beale Jr
Witnessed By

[illegible]
Joseph Nadeau