

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 - NEW ENGLAND

Superfund Records Center

SITE: 107

BREAK: 107

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1

IN THE MATTER OF: ) ADMINISTRATIVE  
 ) DEPOSITION OF:  
 )  
CENTREDALE MANOR SUPERFUND ) DON ASSELIN  
SITE, NORTH PROVIDENCE, RHODE )  
ISLAND )

Deposition of DON ASSELIN, a witness  
herein, taken on behalf of the EPA, on **TUESDAY**,  
**NOVEMBER 30, 1999, 6:00 P.M.**, at the Centredale  
Manor Superfund Site, 2074 Smith Street, North  
Providence, Rhode Island, before Vivian S.  
Dafoulas, Registered Merit Reporter/Certified  
Realtime Reporter.

**ORIGINAL**

Vivian S. Dafoulas, RMR-CRR  
465 Stone Ridge Drive  
East Greenwich, RI 02818  
(401) 885-0992

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APPEARANCES

FOR EPA:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
BY: CATHERINE GARYPIE, ESQUIRE  
ONE CONGRESS STREET, SUITE 1100 (SES)  
BOSTON, MA 02114-2023

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I N D E X

WITNESS

DON ASSELIN

EXAMINATION BY MS. GARYPIE 4

EXHIBITS

PAGE

1 Map 7

2 Map 22

3 Four pages of photograph copies 39

1                                    NOVEMBER 30, 1999, 6:00 P.M.

2                                    DON ASSELIN,

3                    called as a witness and having been first duly  
4                    sworn, testified as follows:

5                                    EXAMINATION

6                    BY MS. GARYPIE:

7                    Q.     I'm going to give a bit of an introduction  
8                    for the record and, then, I'll give you some  
9                    instructions and, then, I'll be asking you  
10                   questions.

11                                    My name is Catherine Garypie. I'm an  
12                   attorney with the United States Environmental  
13                   Protection Agency. I represent the United States.

14                                    This administrative deposition is being taken  
15                   for information-gathering purposes, not for  
16                   adjudicatory purposes, pursuant to Section  
17                   122(e)(3)(B) of the Comprehensive Environmental,  
18                   Response, Compensation, and Liability Act of 1980,  
19                   also known as Superfund.

20                                    The information I'll be asking for today  
21                   relates to the volume and toxicity of wastes at  
22                   the Site, potentially responsible parties at the  
23                   Site, and the ability of potentially responsible  
24                   parties to pay for or perform response actions at  
25                   the Site. And for your information, under the

1 Superfund law, there are four broad categories of  
2 potentially responsible parties.

3 1. Persons who arrange for disposal or  
4 transport of hazardous substances to a Site, also  
5 known as generators.

6 2. Transporters who selected the Site for  
7 the disposal of hazardous substances.

8 3. Past owners and operators of the Site who  
9 owned and operated at the time of the release or  
10 who transferred ownership without disclosing  
11 knowledge of the release.

12 4. Former owners and operators.

13 Just a couple of things. If you need to take  
14 a break, just let me know. If you answer a  
15 question with a nod, I'll ask you whether that's a  
16 "yes" or a "no".

17 A. Okay. All right.

18 Q. And if you -- if I ask you the size of  
19 something and you motion with your hands, I'll ask  
20 you to describe it.

21 A. Yep.

22 Q. And, finally, I'll ask you to wait until I  
23 finish asking the question before you answer, even  
24 if you think you know what I'm going to ask just  
25 so the court reporter can get everything down.

1 A. Okey-dokey.

2 Q. You've already stated your name. What is  
3 your address?

4

5

6 Q. And what's your date of birth?

7

8 Q. And what's the highest level of education  
9 you've completed?

10 A. High school.

11 Q. And have you served in the military?

12 A. Oh, yeah.

13 Q. And what branch of the military?

14 A. Navy during the Vietnam War.

15 Q. How many years were you in the Navy?

16 A. Oh, about three years.

17 Q. And were you honorably discharged?

18 A. Absolutely.

19 Q. And where are you currently employed?

20 A. Apex Tire in Pawtucket.

21 Q. How long have you been there?

22 A. Twenty-five years.

23 Q. What are your job duties there?

24 A. I'm an automobile technician.

25 Q. And what does that entail?

Don Asselin by Ms. Garypie

11/30/99

1 A. I'm a mechanic. I repair cars.

2 Q. Did you prepare for this administrative  
3 deposition or sworn statement?

4 A. Prepared for it? I live around here.  
5 I've seen what's going on. I don't have to  
6 prepare for it.

7 Q. But have you spoken with anybody in  
8 anticipation of coming here tonight?

9 A. No.

10 Q. Have you -- how long have you lived at your  
11 current address?

12 A. Except for the Vietnam War I've been  
13 

14 Q. In the house?

15 A. No, no, not in the house but I was  
16 raised there since I was tiny.

17 Q. Got you. How far is that from the site?

18 A. It's about a third of a mile.

19 MS. GARYPIE: I'm going to hand you what  
20 is going to be marked Exhibit 1.

21 (Whereupon, Asselin Exhibit No. 1 was  
22 marked.)

23 Q. And I'm going to ask you to take a look at  
24 this and let me know when you're done.

25 A. Allendale Pond. Yeah. It's a map of

Don Asselin by Ms. Garypie

11/30/99

1 the area.

2 Q. Okay. I'm going to hand you a pen and ask  
3 you to mark with an "X" where you live.

4 A. Right here.

5 Q. Thank you. When you were younger, did you  
6 have occasion to visit the site?

7 A. All the time.

8 Q. And approximately how old were you when you  
9 visited the site?

10 A. I was between the ages of 10 years old  
11 and about 15 and 16 years old.

12 Q. And how did you get to the site?

13 A. Came in by boat, rowboat, raft, canoe,  
14 whatever floated.

15 Q. And what was the purpose of visiting the  
16 site?

17 A. Scavenging for building materials for  
18 tree houses and whatever.

19 Q. And just so -- I want to check my dates  
20 here -- so that was between 1961 and --

21 A. And I would say 1960 to 1965, 1966.

22 There used to be a whole gang of us that went out  
23 on the river. It was like three or four of us  
24 that -- kids that lived in the neighborhood and  
25 we'd just row all over the place out there and,

1 obviously, this is one of the spots that we went  
2 to.

3 Q. What are the names of other kids?

4 A. One of them is dead in an industrial  
5 accident, a kid named Pat Smith, and there was a  
6 kid named Terry. I don't remember his last name.  
7 That's about it.

8 Q. How many of you would visit the site at a  
9 time?

10 A. Oh, we would all be out in the boat  
11 fishing and hunting, you know, what kids do in  
12 their -- in their early years rummaging around the  
13 woods and exploring the neighborhood and we rowed  
14 our way into the back right over here.

15 Q. When you say, "over here," what part of the  
16 site are you referring to?

17 A. The rear section where the -- where the  
18 dump was, the dump site.

19 Q. And is that the end that's closer to  
20 Allendale Pond or closer to Route 44?

21 A. It's -- it's right in the swamp of  
22 Allendale Pond in the rear section.

23 Q. And when you rode in, you mentioned that  
24 there was a dump there?

25 A. Yes.

Don Asselin by Ms. Garypie

11/30/99

1 Q. Can you describe that a little bit more?

2 A. It was -- it completely surrounded the  
3 end property, the whole end perimeter of this land  
4 behind us here. It was all filled with debris  
5 from the mill and the barrel-recycling place.

6 Q. And when you say, "behind us," are you  
7 referring to the area south of what is now  
8 Centredale Manor?

9 THE WITNESS: That's south, right?

10 MS. GARYPIE: Correct.

11 A. Yes. Yes.

12 Q. What was in the dump?

13 A. Debris from the mill, which consisted of  
14 skids; galvanized aluminum-type cans that used to  
15 contain chemicals; plastic barrel liners that were  
16 inside barrels that were taken out and thrown  
17 away. Some of them had chemicals still in them  
18 and stuff like that.

19 Packaging, all kinds of packaging; plastic  
20 bags; just general debris from the industrial-type  
21 complex. Lots of spilled -- what do they call  
22 that stuff -- sludge, black oozing-type sludge  
23 that was dumped on top of the stuff and if it got  
24 on your shoes, it instantly ruined them.

25 Q. How did it ruin your shoes?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     Well, you couldn't get it off. It was  
2 like tar. I didn't do a chemical analysis of it.  
3 I mean I just stepped in it and said, "Oh, shit."

4           Q.     Were any of the -- was there an odor  
5 associated with the dump?

6           A.     Oh, yeah, you could smell chemicals,  
7 strong. Really, you could pick up on odor all the  
8 time. All -- all the ground that this stuff was  
9 thrown on was actually, it was actually dumped  
10 into a swamp as backfill to make the place bigger.

11           In other words, they were using the trash as  
12 a landfill and, then, they'd just dump dirt on top  
13 of it and keep expanding the back -- the back of  
14 the area to make it bigger.

15           Q.     So would it be filled to -- in order to fill  
16 in the land moving south?

17           A.     Right. Right. It was -- it was -- it  
18 served two purposes. It would -- they would get  
19 rid of their trash and they were using it to  
20 expand the area just little by little, it got  
21 bigger and bigger, and there were chemicals -- all  
22 kinds of chemicals spilled all over the ground,  
23 just barrels dumped right over. Any -- any of the  
24 contents that were in the barrels that were  
25 useless, they'd just tip them upside down in the

Don Asselin by Ms. Garypie

11/30/99

1 swamp and, then, you know, recycle the barrel.

2 Q. Okay. When you were in the dump area, were  
3 there different color chemicals or was it all the  
4 black tar?

5 A. No. It was -- it was powdery  
6 substances. Purple.

7 Q. What color powder?

8 A. Purple color, greens. You name it, the  
9 rainbow colors. It was all kinds of different  
10 stuff left in bags and, you know, just discarded  
11 extra materials that they didn't need.

12 Q. Were any of the containers labeled?

13 A. Yeah. DuPont was written on most of  
14 them. There was a lot of DuPont name brands,  
15 stuff like that. I don't remember the other ones  
16 but I remember the DuPont because there seemed to  
17 be a lot of it.

18 Q. Was there -- did you ever see anything with  
19 the name Metro-Atlantic on it?

20 A. That's a very good possibility. Let me  
21 think. I probably did but I can't remember. I  
22 remember DuPont though. That -- that stuck out in  
23 my mind because that was stamped on the aluminum  
24 galvanized barrels that they threw away.

25 Q. And when you say, "barrels," what sizes are

Don Asselin by Ms. Garypie

11/30/99

1 you talking about?

2 A. 25-gallon, 30-gallon.

3 Q. Do you recall if there were mailing labels on  
4 any of these containers?

5 A. There probably was but we didn't pay  
6 attention to it. If you dug it out, you'd  
7 probably find them.

8 Q. You mean if we dug it now?

9 A. Right. Right.

10 Q. Did you ever have any kind of skin reaction  
11 to any of the chemicals you encountered in the  
12 dump?

13 A. Well, I opened up a 50-gallon drum once  
14 just to see what was inside of it and the -- the  
15 vapors were so intense, it almost rendered me  
16 unconscious, so that was that. I mean it took my  
17 breath away and literally sent me reeling  
18 backwards like, whoa, God, (witness coughing),  
19 let's get the hell out of here.

20 Q. Did you ever get any rashes?

21 A. I don't remember. We are talking -- we  
22 are talking 35 years ago. I -- I don't remember  
23 anything big time. I may have. I mean I just  
24 don't remember.

25 Q. Do you remember getting any chemical burns in

Don Asselin by Ms. Garypie

11/30/99

1 the dump area?

2 A. Shoes.

3 Q. The shoes would burn?

4 A. The shoes were eaten up from walking  
5 around. We knew enough not to touch anything with  
6 our hands except what we were, you know, looking  
7 for, like lumber and stuff that wasn't heavily  
8 contaminated.

9 Q. And as you moved further north at the site,  
10 what was there?

11 A. Thousands and thousands of barrels  
12 stacked in pyramids like this. This would be the  
13 ground level. They would be peaked like that.

14 Q. So you're forming a triangle with your hands?

15 A. Like a triangle, yeah. There would be  
16 50, 60, maybe a hundred drums in one pile and they  
17 would all be neatly stacked like that and there  
18 would be row after row of them.

19 Q. Were there any names on these drums?

20 A. There were various different colors and  
21 various different conditions. Some of them were  
22 rusty; some of them were painted black; some of  
23 them were painted gray. We really didn't examine  
24 them, you know. We weren't looking for names,  
25 anything like that.

Don Asselin by Ms. Garypie

11/30/99

1 Q. What colors do you remember seeing?

2 A. Mainly black, rust; solid rust was a  
3 favorite; black. There would be -- there would be  
4 some green, dark green colors with stripes on  
5 them.

6 Q. What color stripes?

7 A. White. They had white -- some of them  
8 had white stripes. There was some galvanized  
9 drums that were just galvanized color. You know  
10 what I mean by "galvanized metal"? It's not  
11 painted.

12 Q. Is that a silver color?

13 A. Almost, yeah, like a -- like a gray  
14 color.

15 Q. Okay.

16 A. And right where this trailer is, there  
17 would be stacks right here along the edge of the  
18 embankment.

19 Q. And you're referring to the EPA trailer  
20 that's adjacent to the Woonasquatucket?

21 A. Right here. There would be hundreds of  
22 barrels stacked right here and when the river  
23 would flood, like in a rain storm of like two or  
24 three days, we'd get six or seven inches of rain,  
25 the water would come -- come flying down here and

*Don Asselin by Ms. Garypie*

11/30/99

1 it would wash away the barrels that were closest  
2 to the embankment and, of course, they were empty,  
3 so they floated and they just got, you know, all  
4 scattered all over the place downstream.

5 Q. Were the drums that were piled, did they  
6 contain any kind of material?

7 A. Most of them were empty because it was a  
8 recycling plant.

9 Q. Were all of them empty?

10 A. No, not all of them but I would say the  
11 majority of them were.

12 Q. And where was the recycling plant in relation  
13 to the piles of drums?

14 A. You're sitting right in the middle of  
15 it. Right, right here. I think there was a  
16 building farther up this way.

17 Q. And when you say, "farther up this way," you  
18 mean --

19 A. Towards -- towards Route 44.

20 Q. -- you mean north of the EPA trailer?

21 A. Right. Right. And I think what they  
22 had was a sandblaster or a furnace or something  
23 that they would stick the drums in and they'd  
24 burn -- burn the residue out of them and they'd  
25 burn the paint out of them and, then, sandblast

*Don Asselin by Ms. Garypie*

11/30/99

1 them and repaint them whatever color they wanted  
2 and they had this truck that they stacked them on.  
3 Pretty good size truck.

4 Q. Did you see the drum recycling when it was in  
5 operation?

6 A. Oh, yeah.

7 Q. How did the operation work?

8 A. Well, basically they'd just -- they'd  
9 just take orders, I guess, and go into their  
10 inventory and grab the barrels that they needed  
11 and clean them and, you know, refinish them and,  
12 then, ship them out.

13 Q. Now, were they -- did -- did anything happen  
14 to the drums between the time they were pulled  
15 from one of the piles and the time they were  
16 placed in the -- the recycling or the furnace  
17 process?

18 A. Whatever process they were using. Well,  
19 they would empty them if there was anything in  
20 them. They would bring stuff in and they, you  
21 know, they would salvage these drums from other  
22 companies which had chemicals, you know, probably  
23 a quarter full or something like that or, you  
24 know, stuff that they didn't want.

25 So if they took the barrels, they got the

*Don Asselin by Ms. Garypie*

11/30/99

1 chemicals that came with it, and if they found  
2 anything in the drums, they just dumped it on the  
3 ground or right into the swamp. If the barrel was  
4 beyond salvaging, like if it had a lot of holes in  
5 it or it was rotted on the bottom or something  
6 like that, they'd just throw it in the dump.

7 Q. So if they were pouring the -- the residue --

8 A. Right.

9 Q. -- out of the drums --

10 A. Right.

11 Q. -- it would be either in the dump, would it  
12 be near the piles?

13 A. Yeah. Yeah.

14 Q. Would it be near where the recycling was  
15 occurring?

16 A. Pretty close. You're talking maybe a  
17 hundred yards.

18 Q. And when the drums were going through the  
19 furnace, did you ever see anything unusual?

20 A. As -- as like, you know, explosions or  
21 something or --

22 Q. Anything like that?

23 A. No. No.

24 Q. And was the drum recycling process in a  
25 building or outside?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     I think it was in the building.  They  
2     had -- I think what they had set up was down here.  
3     I never really got a good close look at it because  
4     I think it was inside the building but, basically,  
5     what I saw was what they had stacked out here, you  
6     know, and what they did with whatever they had  
7     that they didn't want because we were in the woods  
8     directly behind them.

9     Q.     In the dump area?

10          A.     In the dump area because you couldn't  
11     come in here while they were working.

12          Q.     What would happen?

13          A.     They'd chase us out of here.  They  
14     chased us into the river once.  They cornered us  
15     and they chased us right behind this trailer and  
16     we had to take a dive into the river to get away  
17     from them.

18                 So we would be hanging around out in the  
19     woods waiting for them to pack it up and go home,  
20     so we could wander around the place without being  
21     molested and we'd watch them.

22          Q.     And were there other operations further  
23     north?

24          A.     Yeah.  Metro-Atlantic Chemical.

25          Q.     And did you observe those operations?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     Not as much as this end of it because,  
2     you know, you couldn't really get around the sides  
3     because the river was on the sides but we came in  
4     from the back and that's where the barrel  
5     recycling plant thing was but their -- their  
6     trucks would back up down the road.

7     Q.     When you say their trucks --

8           A.     Metro-Atlantic.

9     Q.     Okay.

10          A.     Metro-Atlantic's trucks because it had  
11     "Metro-Atlantic" all over it, would back down the  
12     road to the dump site and they would open up the  
13     back of it and start dumping the trash from the  
14     mill into the swamp.

15     Q.     So the dump area contained waste from --

16          A.     Both places, right.

17     Q.     -- both companies?

18          A.     Both companies.

19     Q.     And when you were talking about people  
20     emptying the residue from the drums, were those  
21     New England Container employees, drum recycling --

22          A.     Yeah.

23     Q.     -- employees?

24          A.     Yeah.

25     Q.     And how did you know it was the drum

Don Asselin by Ms. Garypie

11/30/99

1 recycling?

2 A. They were hanging around down this end  
3 of the lot. That's where they were working. I  
4 mean I didn't, you know -- other than seeing it on  
5 one of their jackets that said the company name on  
6 it, but you see these guys every day and they are  
7 working in the same area, so I would assume that  
8 that's where they are from.

9 Q. So when you say, "the same area," do you mean  
10 they were working both in the furnace area as well  
11 as back by the dump and, then, the piles?

12 A. Exactly. Right.

13 Q. Did the Metro-Atlantic workers have different  
14 clothing than the drum recycling?

15 A. They had mostly civilian-type clothes,  
16 work clothes, you know, checkered, checkered  
17 shirts and stuff like that. It wasn't like a  
18 military operation. I mean people dressed kind of  
19 sloppy. No specific dress code.

20 Q. And was that true for both companies?

21 A. Pretty much, yeah. Every now and then,  
22 you'd see somebody in a jacket with a name on it.

23 Q. So the way you were able to distinguish who  
24 was working for what company was based on the area  
25 in which --

Don Asselin by Ms. Garypie

11/30/99

1 A. Right.

2 Q. -- they worked?

3 A. Right. Right. Because this property  
4 was split in half. Metro-Atlantic was up there  
5 and the barrel recycling plant was down this end.

6 Q. So when you say, "up there," you're referring  
7 to --

8 A. Towards 44.

9 Q. Okay.

10 A. Right.

11 MS. GARYPIE: I'm going to mark  
12 Exhibit 2.

13 (Whereupon, Asselin Exhibit No. 2 was  
14 marked.)

15 Q. And I'm going to ask you to take a look at  
16 this for a minute or two and let me know when  
17 you're done.

18 A. Let's see -- which way is -- that's --  
19 that's Smith Street. That's Waterman Avenue.  
20 Where are we on this? Where is the river? Oh,  
21 here's the river. Okay. All right. All right.  
22 This is Metro in here. In this area here would be  
23 the barrel recycling area.

24 Q. Okay. I'm going to hand you a pen and I'm  
25 going to ask you to circle the area where

*Don Asselin by Ms. Garypie*

11/30/99

1 Metro-Atlantic operated and draw a "1" next to it.

2 A. Well, this -- this area right here.

3 Q. Okay. Just draw a big circle around it.

4 A. (Witness complying.)

5 Q. And put a "1" next to it.

6 A. (Witness complying.)

7 Q. And if you could draw a circle around where  
8 the barrel company was and put a "2" next to that.

9 A. Okay. A "2" right in the middle of it.

10 Q. Perfect.

11 A. Some of this stuff is labeled, huh?

12 What does that say? Okay. That's -- that's the  
13 building where I think the barrels were  
14 sandblasted or -- or furnaced right here.

15 Q. And you're -- just let the record reflect  
16 you're referring to the second building from the  
17 southernmost -- in other words, it's the building  
18 that says, "Steel drum reconditioning"?

19 A. Yeah. Yeah. That's it. And there's  
20 another one here too. There's another building of  
21 some kind, barrel cleaning. Okay?

22 Q. And does that accurately depict the  
23 operations --

24 A. Yeah.

25 Q. -- in approximately --

Don Asselin by Ms. Garypie

11/30/99

1 A. That's exactly what was here.

2 Q. -- in 1965?

3 A. Around that area. This says '67 but I  
4 don't think it changed much between 1960 and 1967.  
5 It was basically the same. This building here  
6 says, "Chemical manufacturing."

7 Q. And is that the building right next to the  
8 Woonasquatucket River?

9 A. Yeah. Yes.

10 Q. What can you tell me about that building?

11 A. Not a hell of a lot. They had a couple  
12 of pipes that I think extended out towards the  
13 river, like discharge pipes. I'm pretty damn sure  
14 there were pipes coming out of that and farther  
15 upstream, there may have been some pipes coming  
16 out some of the buildings that were along the  
17 side.

18 Q. Do you recall seeing materials discharged  
19 from those pipes?

20 A. Yeah. Occasionally I'd see something.  
21 We usually didn't row up this far because you're  
22 fighting the current. The current is pretty  
23 strong right there and it's a real problem to  
24 out-row the current, so it was very rare, very  
25 rarely that we made up in this area but, on

Don Asselin by Ms. Garypie

11/30/99

1 occasion, we did see them discharging crap and  
2 there would be steam coming from the building, the  
3 vents and the -- the --

4 Q. When you say, "the building," which building?

5 A. This one right here.

6 Q. The small one next to the river?

7 A. Right. Anything along this area here  
8 might have had steam coming out of it somehow. I  
9 don't know what they were doing but, you know --  
10 of course, if we went in there, they'd chase us  
11 out of there, so we couldn't get a real good  
12 inside look of the buildings but it was some kind  
13 of manufacturing or whatever.

14 Q. And what color was the material that was  
15 coming out of the pipes?

16 A. I don't remember a color. Could have  
17 been clear; some kind of clear stuff would be  
18 coming out of it.

19 Q. Do you recall anything else about what was  
20 coming out of the pipe, any other characteristics?

21 A. Hum --

22 Q. Odor or --

23 A. No. We stayed away from them. If there  
24 was something coming out of it, we didn't want any  
25 part of it.

Don Asselin by Ms. Garypie

11/30/99

1 Q. Other than the disposal by the chemical  
2 company and the dump and the spills you described  
3 by the -- in the dump and near the drum piles,  
4 were there other spills that you observed at the  
5 site?

6 A. They had a formaldehyde tank explode.

7 Q. Do you know where that tank was located?

8 A. That I couldn't tell you exactly where  
9 but I imagine it was up near Metro-Atlantic. I  
10 think it was their formaldehyde tank and it was  
11 probably pretty big because it sprayed  
12 formaldehyde all over my house, all over the  
13 neighborhood and I'm a third of a mile away from  
14 them.

15 Q. How do you know it was formaldehyde?

16 A. Because it was in the paper. The tank  
17 blew up; it just ruptured like a pressure cooker.  
18 The top, the roof blew right off of it and the  
19 stuff shot up into the air probably three, four  
20 hundred feet in every direction. It blew apart.

21 Q. Do you remember any other explosions or  
22 fires?

23 A. I heard about them. There were -- I  
24 heard a couple of news reports about fires at  
25 the -- at the chemical mill, like a couple of

Don Asselin by Ms. Garypie

11/30/99

1 explosions here and there through the years. I  
2 didn't actually witness them.

3 Q. Did you ever witness any drums in the dump  
4 area exploding?

5 A. No, not while I was there. I didn't see  
6 anything explode. I wouldn't be here.

7 Q. Do you recall any smoke or haze anywhere in  
8 the site?

9 A. Yeah. You'd have -- you'd have fumes  
10 coming out of the ground that you could actually  
11 see how intense they were. You know like  
12 gasoline? Have you ever seen gasoline kind of,  
13 like, evaporating?

14 Q. Yes.

15 A. That's the kind of fumes you'd pick up  
16 sometimes if -- if you --

17 Q. So you could see chemicals evaporating?

18 A. Right. You could see chemicals  
19 evaporating on the ground and give you that -- how  
20 can I describe it -- like an illusion kind of  
21 thing when you're looking at an object and, all of  
22 a sudden, it gets hazy and, you know, it starts --  
23 how the hell can I say that?

24 Q. It gets wavy?

25 A. Yeah, like heat waves. Have you ever

*Don Asselin by Ms. Garypie*

11/30/99

1 seen heat reflect off the ground? Well, that's  
2 basically what you could see the chemical reaction  
3 doing in the dirt.

4 Q. And was that just in the dump area or was it  
5 in other parts of the site?

6 A. It was -- it was spread around this  
7 area. I mean they weren't very careful with what  
8 they did. I mean they, you know, you could go  
9 walking around --

10 Q. And when you say, "they," are you referring  
11 to both companies?

12 A. Well, basically right behind where the  
13 barrel place is and --

14 Q. Okay.

15 A. -- and, you know, they'd just tip  
16 something over and just dump the contents out on  
17 the ground and not even worry about it. I mean  
18 they'd actually be walking in this crap. I don't  
19 know what they had for boots but it was pretty  
20 nasty shit as far as I was concerned.

21 Q. Did you ever see any workers injured as a  
22 result of contact with materials in the drums?

23 A. I heard them complaining about the smell  
24 a lot, you know. They would be -- they would be  
25 coughing and gagging, you know, working with

Don Asselin by Ms. Garypie

11/30/99

1 these -- with this stuff in the back. They would  
2 be like (witness coughing). That's a nasty one  
3 you know, stuff like that.

4 Q. And when you say, "they," do you mean the  
5 drum-recycling workers?

6 A. Right. Right. I mean you could open  
7 these drums and it would just take your breath  
8 away. I'm a pretty tough person and I can -- I  
9 can handle chemicals to some extent, but I mean  
10 this stuff was so overpowering that it would blind  
11 you and take your breath away.

12 Q. In your current work, do you work with  
13 solvents?

14 A. Oh, yeah.

15 Q. And did you recognize any of these odors as  
16 solvents?

17 A. The stuff we work with is -- it won't  
18 harm your skin and it doesn't have a real, real  
19 toxic substance to it. It's -- it's not like this  
20 stuff. This stuff was nasty.

21 Q. So it was a very different smell?

22 A. Yeah. Yeah. We use a parts cleaning  
23 machine to wash automotive parts that get greasy  
24 and it's an OSHA-approved type chemical and you  
25 really can't smell it but the stuff they were

*Don Asselin by Ms. Garypie*

*11/30/99*

1 playing with was just brutal, nasty.

2 Q. You mentioned -- you probably already told me  
3 this, so forgive me if I'm asking you the same  
4 question again, but when the drums came in and  
5 were placed in the piles, whose truck was bringing  
6 them in?

7 A. They had a huge Ford. I think it was a  
8 Ford.

9 Q. When you say, "they", do you mean --

10 A. The barrel-recycling place.

11 Q. Okay.

12 A. They had a large flatbed truck with  
13 rails on it, so you could put drums in it, a lot  
14 of them. I mean you could stack these things like  
15 20 feet high. Okay?

16 Q. When you say, "drums", what size drums?

17 A. Fifty-five gallons. They could probably  
18 drag in 100 drums in one shot, one truckload.

19 Q. Did the trucks say "New England Container" on  
20 them?

21 A. Oh, yeah. Yeah.

22 Q. Since you lived in the area, did you ever see  
23 this truck outside of the facility picking up  
24 drums anywhere?

25 A. I've seen it -- I've seen it drive by on

Don Asselin by Ms. Garypie

11/30/99

1 the street but I never saw them picking up stuff  
2 wherever they went. I mean they could go  
3 anywhere.

4 Q. And do you know the names of any of the drum  
5 company workers?

6 A. No. The only time I met them, when then  
7 chased me into the river. We weren't on talking  
8 terms at the moment.

9 Q. Do you know the names of any employees from  
10 the chemical company?

11 A. Nope. I was only 12, 13 years old. I  
12 mean -- they didn't seem to have a lot of  
13 employees.

14 Q. How many employees did the drum company have?

15 A. I think they probably had about six,  
16 about six people that worked there. I'm not sure  
17 but I mean you only see two or three of them at a  
18 time. There wasn't like a whole army of them.

19 Q. How many employees did Metro-Atlantic have?

20 A. Oh, they probably had more. They  
21 probably had, like, 50, 60. I mean don't quote me  
22 on that but that's what I'm estimating as to how  
23 many people I would see around the mill.

24 Q. What can you -- can you tell me about  
25 wildlife around the facility?

Don Asselin by Ms. Garypie

11/30/99

1 A. Or lack of it. That's more like it.

2 Over on that side where the water is --

3 Q. When you say, "that side," do you mean the  
4 east side of the site?

5 A. Yeah. Well, that's south, north, east,  
6 west. Yeah, east side. The water was gray, ghost  
7 gray all the time, and there was this gray  
8 sediment that was attached to everything, all the  
9 leaves and branches.

10 If you stuck your hand in the water, you  
11 couldn't see your fingers. I mean if I stuck my  
12 hand in that far, you could wiggle your fingers  
13 and you couldn't see them moving.

14 Q. You mean if you stuck your hand in --

15 A. Yeah, 6 inches, to try to move something  
16 in the water like a log that got in the way or  
17 something like that, if you stuck your hand like  
18 that, you couldn't see your fingers wiggling.  
19 That's how polluted it was.

20 Q. Did the material in the water on the east  
21 side of the site affect the plants?

22 A. Yeah. Yeah. It affected the plants; it  
23 affected everything.

24 Q. How did it affect the plants.

25 A. It would kill it along the embankment.

Don Asselin by Ms. Garypie

11/30/99

1 It was a real tough grow for them over there.

2 They had a hard time. I mean look at the toxic  
3 stuff that they dumped there.

4 Q. Did you ever see any fish --

5 A. None.

6 Q. -- in that area?

7 A. Zero. Nothing, nothing would live in  
8 that water because it was so bad.

9 Q. Did you ever see turtles?

10 A. Turtles? Rarely, very rarely. If they  
11 did go in there, they got right the hell out of  
12 there.

13 Q. How about on the south end of the site in the  
14 dump area, what was the vegetation like there?

15 A. Swamp. Swampy vegetation, you know.  
16 Cattails, skunk cabbage weed, river grass, you  
17 know, stuff like that.

18 Q. Was there vegetation where the dumping was  
19 occurring?

20 A. Yeah, yeah, there was.

21 Q. Would the weeds grow up through the waste for  
22 instance?

23 A. That dump is probably about 5 feet deep,  
24 so that they just kept -- they just pulled right  
25 up to the edge and dumped the crap off and it

*Don Asselin by Ms. Garypie*

*11/30/99*

1 wasn't like it was a lot of stuff at once; it was  
2 over a long period of time that they did that, so,  
3 yeah, you could say that there was some stuff  
4 trying to grow up between it.

5 Q. And did you see wildlife in that area?

6 A. Not usually. I mean birds and snakes,  
7 every now and then you'd see stuff like that but I  
8 would say the wildlife tried to avoid it because  
9 of the smell.

10 Q. And you mentioned just a minute ago that  
11 there was a buildup of waste disposed over time in  
12 the swamp. Was there much waste in the dump area  
13 when you first started visiting the site in 1960?

14 A. I don't think it really changed much.  
15 It -- it -- it basically seemed it stayed the same  
16 as far as whatever they were throwing back there,  
17 it was -- it was usually the same kind of stuff.

18 Q. So was there already material in the dump  
19 when you first started --

20 A. Oh, yeah. That's what attracted us to  
21 the site. Like I said, we were looking for  
22 building materials for tree houses and forts and  
23 stuff like that and that was perfect; that was  
24 right there, so it was like a magnet; we were in  
25 it.

*Don Asselin by Ms. Garypie*

11/30/99

1 Q. Was the water on the east side of the site  
2 moving at all?

3 A. No. Very stagnant. Very stagnant.

4 Q. And the water on the west side was fast  
5 moving?

6 A. Ripping right through here just like it  
7 is right now.

8 Q. Was there any effect on vegetation from the  
9 material that was coming out of the pipes?

10 A. You could see -- you could see the --  
11 the -- this embankment on this side --

12 Q. When you say, "this side," do you mean the  
13 east bank?

14 A. Right. No. That's east; that's west.

15 Q. Correct.

16 A. We are talking the west bank now.

17 Q. The west bank, the west side of the site --

18 A. Right.

19 Q. -- where the land meets the water?

20 A. Right.

21 Q. Okay.

22 A. That side of it was -- was -- would be  
23 stained. It would have like a bathtub ring along  
24 the edge of the water and you could see it. If  
25 the water was high, you wouldn't notice it so

*Don Asselin by Ms. Garypie*

11/30/99

1 much. If it dropped down like a drought, you  
2 could see the -- the -- the stains along the  
3 embankment from whatever was being dumped into the  
4 river.

5 Q. What color was that stain?

6 A. It was black looking. It was like a  
7 brownish-black. Sometimes it was like an a  
8 vomit-type rust color. Hard to describe. It was  
9 just, you know, ugh.

10 Q. Did you ever explore north of Smith Street  
11 along the Woonasquatucket River?

12 THE WITNESS: Past the beginning where  
13 Metro would be?

14 MS. GARYPIE: Right.

15 A. Up here? We went up a little bit.  
16 There's an old dam that used to be there right  
17 next to the Masonic Temple. There's the remains  
18 of an old dam. I don't know if you've seen it.

19 Q. I haven't.

20 A. Okay.

21 Q. But go on.

22 A. And that's about as far as we went up in  
23 that area.

24 Q. The Masonic Temple?

25 A. Right. Here's the river. Here's 44

*Don Asselin by Ms. Garypie*

11/30/99

1 cutting across it and we got up into this area  
2 right here and there's also some manufacturing  
3 metal plants up here where they make jewelry stuff  
4 or chrome plating or whatever.

5 Q. Can you mark that area with a number "3"?

6 A. Right here.

7 Q. And when you were in that area, did you see  
8 any dumping occurring?

9 A. There would be stuff thrown down the  
10 embankments but nothing, nothing like what was  
11 over here.

12 Q. Was the vegetation -- strike that. Let me  
13 start over.

14 Was there a ring, sort of a bathtub ring  
15 along the vegetation in Area 3?

16 A. I can't recall and we didn't really  
17 spend a lot of time up in that area. You know, it  
18 was like once in a blue moon we made it up all the  
19 way to that part because of the -- the current was  
20 so brutal.

21 Q. Let me get back to when you were -- sorry to  
22 jump around so much by the way.

23 A. No problem.

24 Q. Let me go back to where you were describing  
25 the dump area. You mentioned that there would be

*Don Asselin by Ms. Garypie*

11/30/99

1 dumping and, then, there would be filling with  
2 soil?

3 A. Right. They'd just dump dirt on top of  
4 it and bury whatever they had dumped.

5 Q. What kind of equipment did they use to bring  
6 dirt in?

7 A. Probably a dump truck. I -- I didn't  
8 actually witness them doing that but I would  
9 assume that they brought dirt in on a dump truck  
10 and they just leveled it off.

11 Q. So it would be smoothed over once the soil  
12 was brought in?

13 A. Right. And the river, when -- back in  
14 the fifties, 1950s, I would say probably when I  
15 was about seven or eight years old, nine years  
16 old, the river would turn colors. I would wake up  
17 in the morning, it would be blazing red; the next  
18 day, it would be pink; the next day, it would be  
19 purple; the next day, it would be green. It was  
20 like it changed colors every two or three days.

21 Q. And was that -- and you'd go south of the  
22 site, correct?

23 A. Right downstream.

24 Q. Do you know if the water was also turning  
25 colors north of where the site is, north of Smith

Don Asselin by Ms. Garypie

11/30/99

1 Street?

2 A. I don't know. All I could tell you is  
3 what I saw from my back yard when I was this tall.

4 Q. When you say, "this tall" --

5 A. I was seven or eight years old.

6 Q. Was there any kind of fence around the site?

7 A. No, not that I can remember.

8 Q. Was there a fence or a gate at Smith Street?

9 A. Yeah. For the -- for the mill entrance.

10 Q. Was there a gatekeeper there?

11 A. I think they had a watchman that used to  
12 roam around.

13 Q. Do you know his name?

14 A. No. No. I know they had a watchman  
15 because he chased us out of there a couple of  
16 times.

17 MS. GARYPIE: I'm going to mark this 3.

18 (Whereupon, Asselin Exhibit No. 3 was  
19 marked.)

20 **BY MS. GARYPIE:**

21 Q. I'm going to hand you what's been marked as  
22 Exhibit 3 and ask you to take a look at the  
23 photographs. Take your time.

24 A. Yep. The dyes. Yep. That's one of  
25 their trucks.

Don Asselin by Ms. Garypie

11/30/99

1 Q. Have you seen these photographs before?

2 A. I gave them to you.

3 Q. When did you take these photographs?

4 A. I don't know. Three or four months ago  
5 I guess.

6 Q. Was that before EPA was working at the site  
7 or after?

8 A. After. When I -- when I heard about the  
9 investigation, I remembered where one of these  
10 trucks was.

11 Q. Where is that located?

12 A. It's up in Smithfield.

13 Q. Where?

14 A. In a gravel place. They use it as a  
15 storage container. They must have bought it when  
16 the mill went out of business.

17 Q. Do you know the name of the gravel place?

18 A. No, I don't remember the name of it  
19 but --

20 Q. What road is it on?

21 A. You know where the Apple Valley Mall is?

22 Q. Vaguely.

23 A. It's about 5 miles from here, 5 or  
24 6 miles. It's not very far.

25 Q. Do you recall seeing trucks like this at the

Don Asselin by Ms. Garypie

11/30/99

1 site when you visited it between -- the site  
2 between --

3 A. Yeah.

4 Q. -- 1960 and 1965?

5 A. It's the same truck. They probably  
6 had -- I think they had a couple of them. They  
7 had some smaller ones. That's a huge tractor  
8 trailer box and they had some smaller ones that  
9 were labeled "Metro-Atlantic" like that and they  
10 had test tubes on them, you know.

11 Q. You mean painted on the outside?

12 A. Right. Right.

13 Q. What were these trucks used for?

14 A. They hauled the chemicals in and out of  
15 the business.

16 Q. Do you know what products were manufactured  
17 by Metro-Atlantic?

18 A. I know they made dyes; they made  
19 formaldehyde. They were into everything. I  
20 wouldn't be surprised if they made nerve gas for  
21 the United States military for all I know. Have  
22 you ever checked with the military?

23 MS. GARYPIE: I have to ask the  
24 questions right now. Maybe we can talk  
25 afterwards.

1 THE WITNESS: Okay. Sorry.

2 Q. Do you know of any operations by  
3 Metro-Atlantic in any other location?

4 A. Well, judging from the photographs,  
5 there's New Jersey right on one of these pictures.  
6 Where does it say that? Yeah, there's a name  
7 right here, right on the bottom.

8 Q. Okay. Do you have any other knowledge of any  
9 other operations?

10 A. No. They -- they may have had other  
11 operations but I don't -- I'm not aware of them.

12 Q. Okay. I'm going to hand you a document that  
13 I'm not going to mark as an exhibit. But I'm  
14 going to describe it and, then, talk about it with  
15 you.

16 The first document that I'm handing you is an  
17 aerial photograph and it's -- it has a label that  
18 states: "Woonasquatucket River, Providence, Rhode  
19 Island. PIC 9901116S. Date flown: September 2,  
20 1963. Source: ASCS. Frame No. 158. Approximate  
21 scale 1 inch equals 185 feet."

22 I'm going to have you take a look at this  
23 document and let me know when you're finished.  
24 Okay? I'll have to ask you not to draw on this  
25 one.

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     Okay.  No problem.  Now, this is 1963?

2           Q.     Yes.

3           A.     Okay.  Right around the time.  All  
4 right.  This -- this white area right here would  
5 have been the dump site area.

6           Q.     And if the -- let the record reflect that the  
7 witness is pointing to the southern portion of the  
8 site.

9           A.     Right.  Even -- there's like a white,  
10 white color there.  That's probably stuff that's  
11 been dumped.

12          Q.     And that would be directly across from Grover  
13 Street?  Is that the name of that street?

14          A.     Yeah, pretty much.  Yeah.  Right around  
15 in that area.  Very fuzzy photograph, hum?  See,  
16 this is the area we used to hide in right here.  
17 We'd come up come up from here and you could --  
18 you could walk through the swamp right to the back  
19 of the area.

20          Q.     Just south of the --

21          A.     Right.

22          Q.     -- the white area?

23          A.     Right.  Or you could come up the -- you  
24 could come up along the side right here.  This is  
25 the area where it was all gray.  It was -- it was

Don Asselin by Ms. Garypie

11/30/99

1 discolored.

2 Q. On the east side?

3 A. Right. Right up to this area right  
4 here. It was completely void of life. It was  
5 like toxic waste beyond belief. Okay?

6 Q. And where were the drum piles?

7 A. Let's see -- can't use that pen, right?  
8 There would be piles of drums right all over this  
9 area. There seems to be a lot of stuff right  
10 here.

11 Q. And when you say, "right here," you're  
12 referring right next to the southernmost building?

13 A. Right. I can't tell what -- what this  
14 is.

15 Q. That may be a bit in between?

16 A. It looks like there's a lot of stuff  
17 right along the embankment right here.

18 Q. And that's on the west side of the river --

19 A. Right.

20 Q. -- just a little north of the bare spot?

21 A. Right. Yep. These look like drums,  
22 whatever the -- whatever they had there. I think  
23 they are the tops of drums but this is all -- this  
24 is all -- it looks like this is all trash, all the  
25 stuff that was just dumped right on the ground.

*Don Asselin by Ms. Garypie*

11/30/99

1 Q. The white area?

2 A. Right. The white area and possibly  
3 right along here too.

4 Q. And where is the -- is the white area that  
5 shows on this map, is that the area where there  
6 would be material dumped and the soil piled on  
7 top?

8 A. Right. Right. Exactly. Yes.

9 Q. Okay. I'm going to show you a second  
10 document, which I'm not going to mark as an  
11 exhibit but I'll read the label.

12 It states: "Woonasquatucket River,  
13 Providence, Rhode Island. PIC 9901116S. Date  
14 flown: April 6th, 1965. Source: Statewide  
15 Planning. Frame No. 1090. Approximate scale  
16 1 inch equals 205 feet."

17 I'm going to ask you to take a look at this  
18 aerial photograph and let me know when you're  
19 done.

20 A. I think that's the river. This almost  
21 looks like a negative. Yeah. Here's all the  
22 stuff. There's all the barrels all stacked up.  
23 You can't really tell what they are because this  
24 is such a fuzzy photograph but those are all drums  
25 all in this area right here and back here, you can

*Don Asselin by Ms. Garypie*

11/30/99

1 see little white specks and stuff. That's --  
2 that's all debris.

3 Q. And the area that you're pointing to, that's  
4 across from Grover Street?

5 A. Right. Right.

6 Q. And the specks that you're talking about --

7 A. Right. That's -- that's the dump site.

8 Q. The dump site is right directly across from  
9 Grover?

10 A. Pretty much.

11 Q. And moving up that little road north --

12 A. Right.

13 Q. -- you see drum piles along --

14 A. Drum piles. That -- that is the road  
15 that comes down and, then, they just -- this area  
16 here would be a little space between where the --  
17 the pyramids of drums were and the dump itself, so  
18 they could turn around --

19 Q. Okay.

20 A. -- and come back up.

21 Q. Is that why there's a circle at the site?

22 A. Yeah. Kind of. Yeah. But that area  
23 could be filled and then emptied; filled, emptied;  
24 depending on what inventory they had at the time.

25 Q. Okay.

Don Asselin by Ms. Garypie

11/30/99

1           A.    All right?  Right now it looks a little  
2 empty but --

3           Q.    And would there also be drums piled --

4           A.    Everywhere.  The whole place was nothing  
5 but 55-gallon drums.

6           Q.    So moving further north --

7           A.    Right.

8           Q.    -- towards the southern end of the buildings,  
9 would you see drums?

10          A.    They'd be all over the place.  They'd be  
11 all over the place.  This was their parking lot.  
12 There's their -- see their big long tractor  
13 trailer?

14          Q.    Okay.

15          A.    That's the tractor trailer box.

16          Q.    So that's in the parking lot on the -- the  
17 west side of the site along the Woonasquatucket?

18          A.    Right.  That's -- that's -- that's -- I  
19 don't know how long that is but that's a big one.  
20 There's nothing else there that's that long.  
21 That's your -- that's your tractor trailer box.

22          Q.    So were these -- were the conditions that are  
23 depicted here the conditions that you saw between  
24 1960 and 1965?

25          A.    Yeah.  Basically.  This was their --

*Don Asselin by Ms. Garypie*

*11/30/99*

1 this was their truck lot where they parked. Now,  
2 these are pretty good size trucks.

3 Q. And that's at the southern end --

4 A. Right.

5 Q. -- of the parking lot?

6 A. Right. I think they had four or five  
7 good size trucks and the barrel recycling plant  
8 may have had one or two but they were different  
9 type. They were different type trucks because  
10 they were hauling barrels and lots of them.

11 Q. Did the barrel company's trucks have tops on  
12 them or were they just straight --

13 A. No, they were open. They were  
14 straight-body trucks with flatbeds with removable  
15 sides, like steel inserts, so you could put the  
16 drums on and just pull the inserts out and, then,  
17 unload them --

18 Q. Okay.

19 A. -- like a real quick operation. That's  
20 if they were empty.

21 Q. I've been using the name "Metro-Atlantic"  
22 with regard to the chemical company.

23 A. Right.

24 Q. Were there any other names that were  
25 associated with the chemical company?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.    I have no idea.  I imagine they did  
2 business all over the place but you'd see their  
3 trucks on the road, you know, like anything  
4 else --

5           Q.    Did the --

6           A.    -- any other business.

7           Q.    Did the chemical company ever change names?

8           A.    Not that I know of.

9           Q.    Is there anything else that I haven't asked  
10 about that may be helpful to EPA in its  
11 investigation that you can think of?

12          A.    That's basically -- I think that's  
13 basically about it.  Other than the drums, the  
14 drums would get washed off the embankment right  
15 here in a real bad rainstorm and would be flooded  
16 into that area.

17          Q.    That would be on the west side of the site?

18          A.    Right.  It would come tearing through  
19 here and it would just pick them right up and just  
20 like a toilet, they'd be gone.  Woof!  And I mean  
21 I'm talking 30, 40, 50 drums in a whack.  We are  
22 not talking one or two; we are talking a lot.

23          Q.    Did you ever visit the site when the Brook  
24 Village building or the Centredale Manor building  
25 was being built?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     Oh, yeah. I was -- I was -- I was  
2 wondering why they were putting up a high-rise  
3 building to put elderly -- to house elderly people  
4 on a toxic waste site.

5           Q.     Did you voice that concern to anyone else?

6           A.     Not at the time because I figured nobody  
7 would listen to me anyways. You know, politics in  
8 this area is -- they are going to look at you,  
9 like, yeah, okay, sure.

10          Q.     Did you visit the site when there was  
11 construction going on for either building?

12          A.     I used to look at it from the parking  
13 lot across the street there, you know, where the  
14 Cumberland Farms is.

15          Q.     Okay. So that's on Smith Street behind  
16 Centredale Manor?

17          A.     Right.

18          Q.     Like between Centredale Manor and Smith  
19 Street?

20          A.     Yeah. I never really walked down here  
21 and got, you know, onto the site because, you  
22 know, because they were working on it but you  
23 could see them working on it from up here and they  
24 were taking out drums out of the ground and debris  
25 when they were digging the foundation for this

*Don Asselin by Ms. Garypie*

11/30/99

1 building.

2 Q. When you say, "this building," do you mean  
3 Centredale Manor?

4 A. Which one is in the back?

5 Q. Centredale Manor.

6 A. Centredale Manor. Right. I heard that  
7 they took out 200, 300 drums out of the ground  
8 that were either full of chemicals or just  
9 flattened out, run over or whatever.

10 Q. Did you see any drums coming out of the  
11 ground that contained residue or material?

12 A. I didn't get that close. I mean I  
13 imagine from, what I'd seen before, that there had  
14 to be some that were still full of whatever they  
15 had in them.

16 Q. Were the workers that were handling the drums  
17 in any sort of safety clothing?

18 A. I don't remember. You mean like the  
19 stuff the EPA wears? Those white suits and stuff  
20 like that?

21 Q. Right.

22 A. I don't think so. I don't remember  
23 anybody in any -- any toxic suits. Before they --  
24 before they had done -- started construction on  
25 that, I had heard about it and I took a walk back

*Don Asselin by Ms. Garypie*

11/30/99

1 there and there was still stuff on the surface;  
2 there were drums that were split open.

3 Q. Now, is that -- let me go back. Was that --  
4 was that before Centredale Manor was built?

5 A. Right.

6 Q. And was that after Brook Village was built or  
7 before, do you recall?

8 A. It was before. I think it was --

9 Q. Before either building?

10 A. -- before either building was up.

11 Q. Okay.

12 A. They had -- they had knocked down --

13 Q. What -- what year was this?

14 A. Oh, God, 1980, 1981. I can't be sure.

15 Q. Okay.

16 A. But I walked this area. I came down in  
17 here because they had taken the mill down. I  
18 think it was ripped down, burned down or whatever  
19 and I had walked back here.

20 Q. When you say, "walked back here," do you mean  
21 you walked from --

22 A. Smith Street down through the area  
23 because it was a --

24 Q. So you went south from Smith Street?

25 A. Right.

Don Asselin by Ms. Garypie

11/30/99

1 Q. Okay.

2 A. There were drums on the ground that were  
3 half -- half crushed and I lifted one of them up  
4 and there was this crystallized blob of  
5 multicolored chemical compounds of some kind that  
6 were in the drum and they were like red, red,  
7 white, and -- and green color like. It looked  
8 like a mixture of different stuff and it was a  
9 solid. It wasn't -- it wasn't a sludge or wet  
10 type stuff; it was a solid, and it was just lying  
11 on the ground half run over like somebody had hit  
12 it with a truck or -- or flattened it with a  
13 bulldozer or something like that and I lifted it  
14 up and I looked inside of it and I went, "Jesus,  
15 they never did clean this place up, you know."

16 Q. And how many -- how many drums did you see on  
17 that walk?

18 A. On that walk? It was probably 20.

19 Q. Was that the only one that contained  
20 material?

21 A. That I noticed. I didn't flip them all  
22 over, you know, and get -- and get real personal  
23 with them or anything like that. I was just -- I  
24 just flipped that one over because I was curious.

25 Q. Did you see anything else on that walk that

1 was unusual?

2 A. Just debris. Just, you know, piles of  
3 wood and cardboard and trash like that that had  
4 been left behind from the demolition of the  
5 building.

6 Q. Were there names on any of the drums?

7 A. No. This was one was rusted so bad, I  
8 mean it fell apart when I picked it up, literally  
9 fell apart. Most -- most of the chemicals that  
10 they used were really toxic and very volatile.  
11 Like they'd eat steel; they'd corrode metal real  
12 easy, so if they left it in the -- in a drum,  
13 eventually this dissolved the drum.

14 Q. Is there anything else that you recall from  
15 that time when -- when the buildings were going  
16 up?

17 A. I was just awed that they were doing it  
18 because it was a flood plain and it was a toxic  
19 waste site and I thought it was general knowledge  
20 that -- that it was.

21 Q. Did you talk to your neighbors about it?

22 A. No. Nobody cared. It was out of our  
23 hands. We couldn't do anything about it. You  
24 know, even if we complained to city hall, what are  
25 they going to do?

Don Asselin by Ms. Garypie

11/30/99

1 Q. To the best of your knowledge, was it well  
2 known in the community at the time the buildings  
3 were being built that it had been used for  
4 chemical manufacturing and drum recycling?

5 A. It was in the newspaper. It was in the  
6 Journal that they took barrels out; that they took  
7 chemicals out of the ground. That should have  
8 stopped them right there because they didn't clean  
9 up the whole site; they just did the foundation  
10 for the building.

11 Q. What about right before they started building  
12 the buildings? Would it have been known in the  
13 community at that time that the site had been used  
14 for chemical manufacturing and drum recycling?

15 A. Absolutely. That's a huge complex. I  
16 mean it was -- it had been in business for 40  
17 years or whatever, something to that effect. I  
18 don't know when they -- when they actually opened.  
19 Probably in the 1940s. Do you know? You don't?  
20 Okay.

21 MS. GARYPIE: I have to let you answer  
22 the questions.

23 THE WITNESS: All right. I -- I would  
24 say, yes, I would say, because everybody that  
25 lived along this river knew that it changed colors

Don Asselin by Ms. Garypie

11/30/99

1 all the time and nobody ever goes out on this  
2 river.

3 I mean you never see boats out there;  
4 you never see people swimming in it and if you  
5 lived along the embankment, you knew better.  
6 Okay? You don't drink the water; you don't eat  
7 the mud; you don't eat the fish out of the river.  
8 I mean it was just beyond -- beyond comprehension  
9 to eat, you know, to eat or drink anything out of  
10 that river. Never mind swim in it, my God.

11 Q. Would -- do you know of anyone who swam in  
12 the river?

13 A. No.

14 Q. No?

15 A. No, not on this end.

16 Q. Not on the south end of the site?

17 A. Not on that south end of the site. I  
18 mean I could count on two -- I could count on both  
19 hands how many people I actually saw going down  
20 that river in a boat; never mind swimming in it.

21 Q. Is there anything else you can think of that  
22 might be helpful for us to know?

23 A. That's about it I would say.

24 Q. Is there anyone you could think of that we  
25 might talk to, to get more information about the

Don Asselin by Ms. Garypie

11/30/99

1 operation or the history of the site?

2 A. See, I wasn't employed there and I  
3 didn't know anybody personally that worked there.  
4 I was just a kid, you know, 13-year-old kid,  
5 14-year-old kid running around. It was just a  
6 playground to us. It was someplace to go and hang  
7 out, fish or try to fish.

8 I think that's about all I can tell you about  
9 it unless you want to, you know, go over these  
10 maps or if you got any better or clearer  
11 photographs.

12 Q. Unfortunately, no.

13 A. Okay. But that whole -- that whole  
14 spot, that is a dump site. Have you got any  
15 photographs from the seventies?

16 Q. Yes. Let me hand you a photograph again. I  
17 won't mark this as an exhibit but the label reads:  
18 "Woonasquatucket River, Providence, Rhode Island.  
19 PIC 9901116S. Date flown: March 9th, 1970.  
20 Source: U.S.G.S. Frame No. 225. Approximate  
21 scale 1 inch equals 185 feet."

22 Let me hand you that and take a minute to  
23 look at it.

24 A. Bingo. There it is. This is -- this is  
25 a much clearer photograph. All right. There's

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11/30/99

1 all your drums piled up right there. You can  
2 see -- you can see the tops of them.

3 Q. Hold on just a minute.

4 A. Right here.

5 Q. What you're pointing to is the southern end  
6 of the site and it's just across Grover Street but  
7 a little south?

8 A. Yeah. Actually, it lines up with this  
9 street, the tip of the --

10 Q. Is it Redlum?

11 A. Redfern.

12 Q. Redfern.

13 A. See, this -- this photograph here in  
14 1970 shows it farther back.

15 Q. Okay.

16 A. It's actually progressing farther back.  
17 All right?

18 Q. All right.

19 A. And here's your piles of drums right  
20 there.

21 Q. And that's just north of the cleared area?

22 A. Right. North of the cleared area where  
23 they come down and turn around and go back up the  
24 road.

25 Q. And that's just to the right of the road?

*Don Asselin by Ms. Garypie*

11/30/99

1           A.     Yeah.  That's -- that's your main road  
2 right there and there's all drums.  This is all  
3 drums, all the way down the embankment right to  
4 where you get to the ground where the dump starts  
5 and this is all drums right here.

6           Q.     So on both sides of the roads, you are seeing  
7 --

8           A.     Oh, yeah, both sides of the roads, all  
9 over the place; they were just everywhere.

10          Q.     And if you move further north from the  
11 cleared area that you're talking about so you're  
12 just north of Steere Avenue --

13          A.     Yeah.

14          Q.     -- across from Steere Avenue, there's sort of  
15 a blank space or flat space?

16          A.     That's -- that's --

17          Q.     Do you know what that is?

18          A.     I have no idea.  I have no idea.  Were  
19 they are going to put up a building there or  
20 something?

21          Q.     So that was not there when you visited the  
22 site?

23          A.     I don't remember it.  I don't remember  
24 what they did with that.  But these -- these are  
25 all drums; all this area is all drums.

Don Asselin by Ms. Garypie

11/30/99

1 Q. So that's on either side of the road pretty  
2 much from the building south?

3 A. Right. Right. Right. Have you got a  
4 photograph from '75?

5 Q. What I have is I have another photograph that  
6 is labeled: "Woonasquatucket River, Providence,  
7 Rhode Island. PIC 9901116S. Date flown:  
8 May 5th, 1976. Source: EPA. Frame No. 62.  
9 Approximate scale 1 inch equals 270 feet." Why  
10 don't you take a look at that?

11 A. That looks like the operation is gone  
12 now. I don't see any buildings.

13 Q. I don't either.

14 A. It looks like it's been cleared right  
15 out. When did they go out of business?

16 MS. GARYPIE: That's about it --

17 THE WITNESS: Okay. It's gone.

18 MS. GARYPIE: -- for photos.

19 THE WITNESS: Everything has been  
20 bulldozed. Okay? And the dump site is still  
21 there. You can still see it.

22 Q. So you're pointing to the lighter area --

23 A. Right.

24 Q. -- that's just across from Grover Street?

25 A. Exactly.

Don Asselin by Ms. Garypie

11/30/99

1 Q. A little bit south?

2 A. Yeah. That's gone. It's -- it's --  
3 everything is missing now. This is where I was in  
4 the parking lot while I was watching them put up  
5 the buildings right here --

6 Q. Okay.

7 A. -- from this vantage point and the drums  
8 that I found were right -- right -- right in this  
9 area --

10 Q. Okay.

11 A. -- right there.

12 Q. So that's -- from where -- let's see --

13 A. That's Smith Street.

14 Q. That's Smith Street?

15 A. That's where Cumberland Farms would be  
16 right now.

17 Q. Which is adjacent to the building that's  
18 depicted here?

19 A. Right. That's burned. That's leveled.

20 Q. The large building on the south side?

21 A. Right. That's gone. Cumberland Farms  
22 is right there and you could walk down in the  
23 parking lot and you could see the construction  
24 going on for Centredale Manor and Brook Manor and  
25 this building I think went up first, I'm sure, but

*Don Asselin by Ms. Garypie*

11/30/99

1 I took a walk down here just to be curious and I  
2 found drums that were still, you know, lying  
3 around half crushed with crap in them.

4 Q. So that was before Brook Village was up or --

5 A. It was either just before or just after  
6 they put the building up.

7 Q. Okay. Did you see any drums in the -- where  
8 Brook -- in the area where Brook Village is now  
9 located?

10 A. No. They were mostly -- see, this was  
11 all bulldozed over. This was all --

12 Q. The whole site?

13 A. The whole site was cleaned out and there  
14 was just remnants of what was -- what was there,  
15 you know, stuff that didn't get carted away  
16 because it was off to the side or something like  
17 that and, you know, like in the bushes, you know  
18 what I mean on the embankment of the river.

19 Q. So it would be close to either the river or  
20 the tailrace?

21 A. Right. They cleaned out the middle of  
22 it and whatever debris was left on the sides, they  
23 didn't bother with it; they just left it there.

24 Q. Did you ever see any bulldozers pushing  
25 debris towards either the tailrace or the river?

Don Asselin by Ms. Garypie

11/30/99

1 When I say, "the tailrace", I mean the east side  
2 of the site?

3 A. All I know is there were bulldozers back  
4 there but I didn't physically see them. They  
5 probably did fill some of it in or whatever. It's  
6 possible.

7 Q. But you didn't see that yourself?

8 A. No, that I didn't see. I just happened  
9 to be wandering through there and I stumbled  
10 across drums that were half run over and, you  
11 know, stuff was oozing out of them or the one I  
12 picked up was like a crystallized multicolored  
13 blob of chemicals. That's about all I can tell  
14 you.

15 MS. GARYPIE: Okay. I think we are done  
16 for this evening. Thank you.

17 (Adjourned at 7:15 p.m.)

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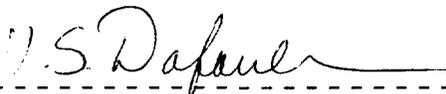
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3  
4 C E R T I F I C A T I O N

5 I, VIVIAN S. DAFOULAS, Registered Merit  
6 Reporter/Certified Realtime Reporter, Notary  
7 Public in and for the State of Rhode Island, do  
8 hereby certify that the witness was first duly  
9 sworn to tell the truth, the whole truth and  
10 nothing but the truth in the matter of CENTREDALE  
11 MANOR SUPERFUND SITE, NORTH PROVIDENCE, RHODE  
12 ISLAND; that I am in no way related or have any  
13 interest in said matter and that the testimony of  
14 said witness was duly recorded by me in  
15 computerized stenotype and is a true and accurate  
16 transcription of my notes.

17 IN WITNESS WHEREOF, I have hereunto set  
18 my hand this 2nd day of December, 1999.

19  
20   
21 -----  
22 Vivian S. Dafoulas, RMR-CRR  
23 465 Stone Ridge Drive  
24 East Greenwich, RI 02818  
25 (401) 885-0992

Vivian S. Dafoulas, RMR-CRR  
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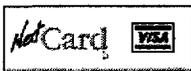
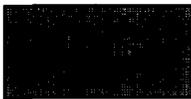
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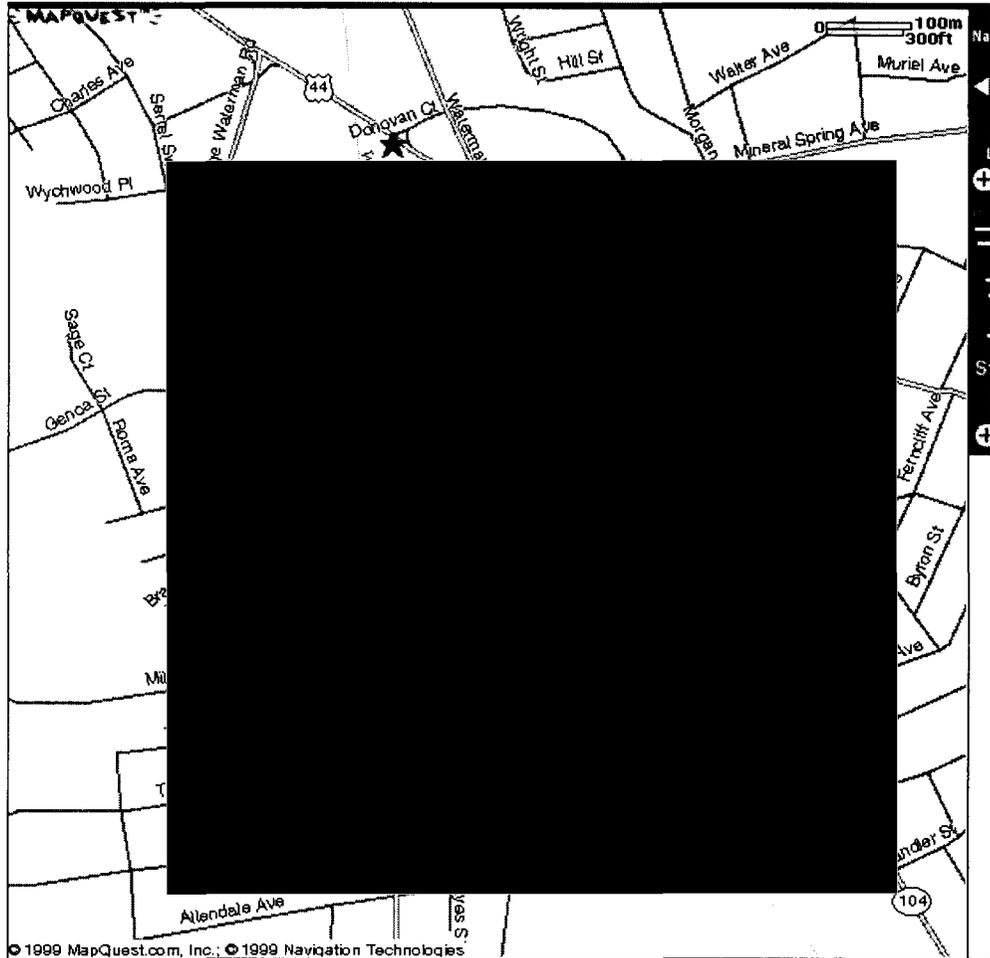
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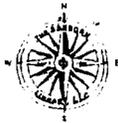
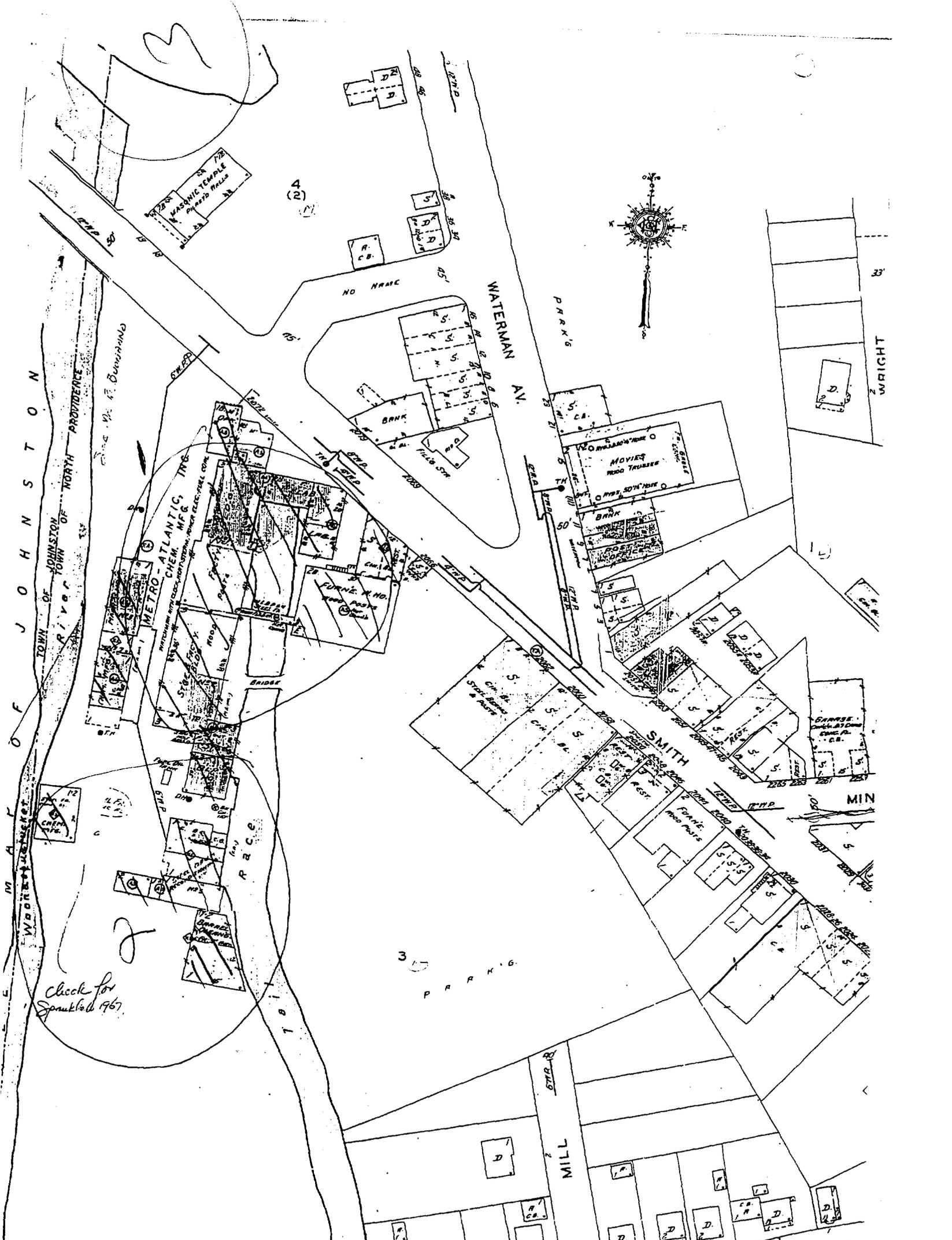
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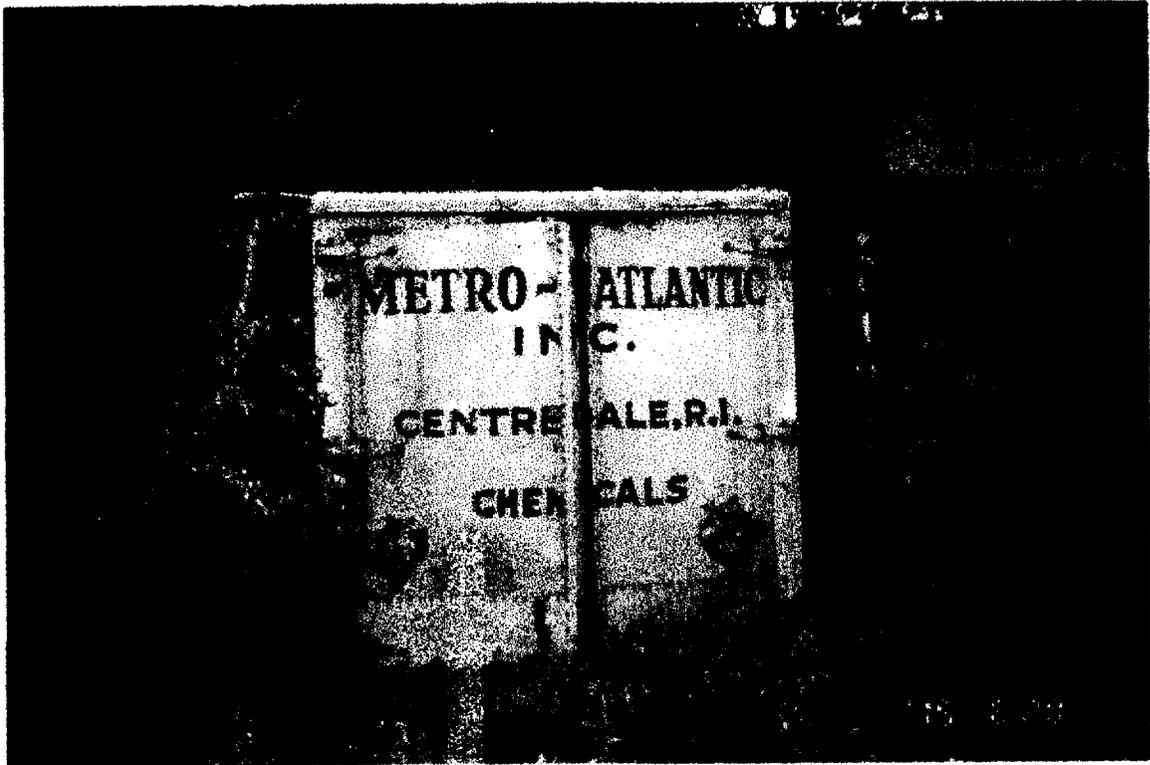
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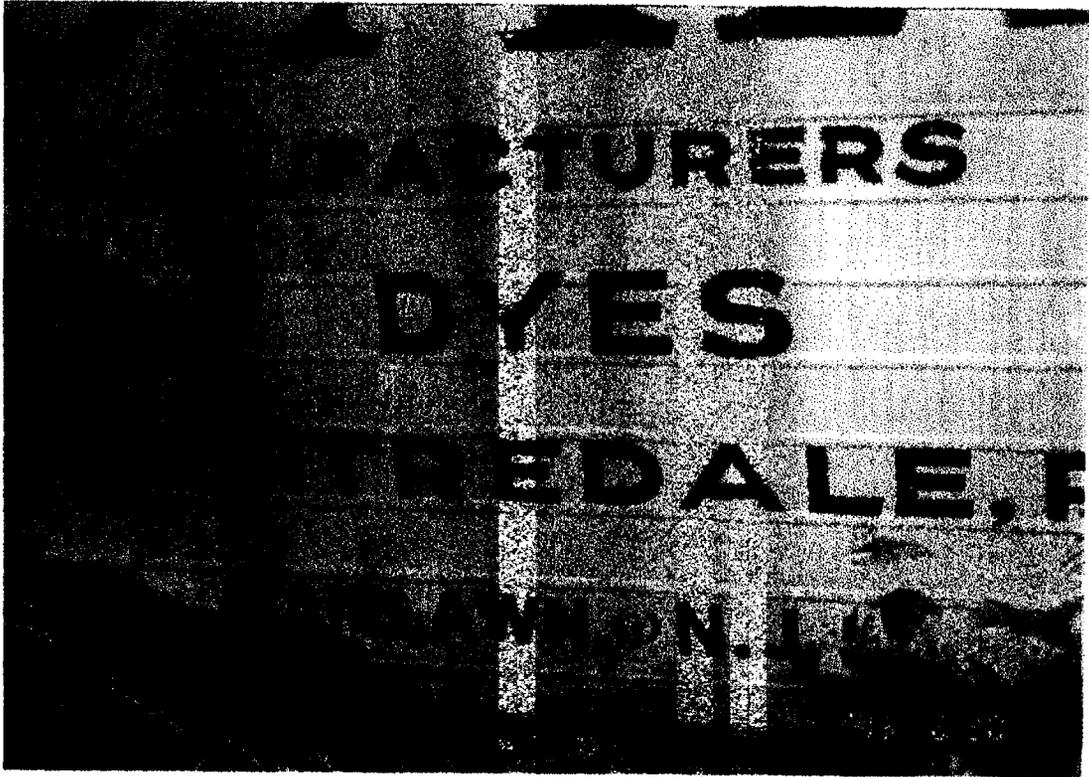
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