

STATEMENT

I, Raymond Nadeau, do hereby state and depose:

1. I am an adult resident and citizen of the State of Rhode Island. I am under no disabilities which would render me incompetent to testify to the matters stated herein, and all of the statements herein are made on the basis of my personal knowledge and observation.
2. I was employed by the New England Container Corporation ("NECC"), which was located on Smith Street in the Centredale section of North Providence, RI, from approximately 1956 until approximately 1969. Between approximately 1956 and approximately 1962, I worked in a variety of jobs throughout the plant. Thereafter, I worked as a truck driver for the company and when not driving, I continued to work in the plant.
3. I was hired at NECC by Mr. Bernard Buonanno, Sr., who was the President of NECC and also the general manager of the chemical company, which was located on the same property as NECC. Mr. Buonanno was at the plant on a daily basis.
4. Throughout the approximately thirteen years of my employment with NECC, Mr. Buonanno was responsible for, and made all decisions about all aspects of all operations in the NECC plant, including the handling of barrels received by NECC which contained liquids or sludge when NECC received them. I personally received instructions from Mr. Buonanno when I began working at NECC about the way such barrels (and all other types or groups of barrels) should be processed.
5. Barrels were primarily brought to the NECC plant on NECC trucks, the chemical company trucks, and by independent barrel dealers. The incoming barrels were unloaded from the trucks, some trucks containing as many as 200 barrels. If the barrels were open tops, they were stacked in an upright position, if they had covers on them, they were stacked on their sides, in rows of 50 feet and 5 barrels high in a pyramid configuration. I was instructed by Mr. Buonanno that barrels containing significant amounts of chemical residues should be taken to the area south of the NECC plant at a point where a branch of the river rejoined the river. The contents were to be emptied onto the ground in that area, and the barrels brought back to the NECC plant for reconditioning.
6. The initial step in the reconditioning process was to burn the barrels clean in the gas-fired furnace, which contained 5 or 6 burners. The barrels were brought to the conveyor, which led into the furnace. If there was a flammable liquid in the barrel, a match was thrown in the barrel to ignite the liquid and burn it off, so that it did not explode in the burner. Some of these barrels came from a lacquer

facility in Exeter, Rhode Island, which made paints. The barrels were placed upside down on the conveyor belt and any remaining liquid or sludge drained into the cement pit underneath the conveyor. The barrels were then burned clean.

7. When the sludge pit was full, the contents, which was a mixture of all types of chemicals, including formaldehyde, was shoveled into barrels, which was taken to the landfill below the plant and emptied. Approximately two 55 gallon barrels were dumped on the ground of the landfill each week.
8. Ash, from the material burned from the barrels in the furnace, was swept onto the ground adjacent to the burners or sometimes placed into barrels which were emptied at the plant landfill.
9. After the barrels were burned clean, the dents were rolled out of the barrels and they were sandblasted and water tested for leaks. The dust residue from the sandblasting operation was also disposed of at the plant landfill.
10. If the barrels did not pass the leak test, they were sold to the Parks Department of Warwick, R.I. If they passed, they were coated with a Teflon lining and the outside of the barrel was spray painted. The barrels were then burned in an oven and stacked for shipment to the customer.
11. The barrels were spray painted different colors, depending on the customer's request. Paint, MEK, toluene and mineral spirits were used in the operation. Approximately 3, one-gallon cans with a mixture of these chemicals in them, were disposed of on a weekly basis at the plant landfill.
12. From approximately 1962 until approximately 1969, I worked as a truck driver and drove a straight body truck, which held up to 150 barrels. I delivered clean barrels and returned barrels to NECC for which NECC paid, from the following companies:

H.S. Oil, (E. Providence, RI)

An oil distributor from which I would obtain 150 barrels, per week, some with an oil residue inside.

Bradford Soap Works, (Warwick, RI)

I would obtain 50 to 75 barrels with residues, every two weeks

Warwick Chemical, (Warwick, RI)

I would obtain 150 barrels, from one to two times per week. The barrels would contain up to 2 inches of liquid chemicals.

Eastern Chemical, (N. Providence, RI)

On a weekly basis, I would obtain 20 to 30 barrels with chemical residues in them.

Coufax Packing, (Pawtucket, RI)

This company made pies and cookies. The waste in the barrels was lard.

Crown Chemical, (Providence, RI)

Every 2 weeks, I would obtain 75 barrels, which contained chemical residues.

Hoechst Chemical, Arctic, RI (off Rte. 117)

Once or twice a week, I would obtain 150 barrels which contained dye powder residues, which turned my clothes various colors and also ate holes in them.

T.H. Baylis Chemicals, (Warwick, RI)

Every 2 weeks I would obtain 30 to 40 barrels with chemical liquids, including mineral spirits, in them. This company truck drivers also sold barrels to NECC, which came from Baylis's customers.

Organic Chemical, (Rte 44, Providence, RI)

On a monthly basis, I would obtain 10 to 12 barrels with chemical residues in them.

Dytek Chemical, (School Street, Pawtucket, RI)

On a monthly basis, I would obtain 30 barrels with liquid soap and cleaner fluid residues in them.

Thompson Chemical, (Attleboro, MA)

On a monthly basis, I would obtain 150 barrels, some with chemical residues in them.

Teknor-Apex, (York Ave., Pawtucket, RI)

On a monthly basis, I would obtain 150 barrels with clean motor oil residue in them. We used this oil in the company trucks or in our personal vehicles.

Duoset, (off Rte. 44, Rockville, CT)

Every 3 or 4 months, I would obtain 150 barrels with chemical residues in them.

Esso Oil, (E. Providence, RI)

On a monthly basis, I would obtain 50 to 60 barrels with an oil residue in them.

Worcester Textile, (Graystone, RI)

Every 3 or 4 months, I would obtain 15 to 20 barrels with dye and alcohol residues in them.

Greenville Finishing, (Greenville, RI)

On a monthly basis, I would obtain 75 to 100 barrels with dyes and alcohol residues in them.

Otis Air Base, (Falmouth, MA)

In the 1060's, on one occasion 2400 fifty-five gallon barrels with turbine oil residues in them.

Quonset Naval Base, (Warwick, RI)

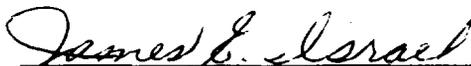
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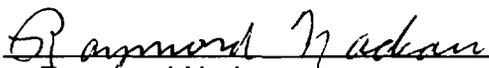
George Mann Co., (Providence, RI)

On a monthly basis, I would obtain 40 to 50 barrels with toluene, naphtha, MEK, and ammonia residues in them.

11. There are additional companies, whose names I can't recall, from which I obtained barrels from and delivered them to NECC. Dirty barrels were purchased from Raymond Barrel and Farrell Barrel for cleaning and reconditioning.
12. Besides NECC's trucks, other barrel dealers brought and sold barrels to the company for reconditioning. These barrel dealers would buy or obtain barrels from various companies in Rhode Island, Massachusetts, and Connecticut and then sell them to NECC. These barrels usually contained some type of waste material in them. Some of these barrel dealers were Mathews Barrel of Fall River, Efros Barrel of Providence, RI, and Woburn Barrel of Woburn, MA. Efros Barrel brought 50 to 60 barrels to NECC, usually 2 to 3 times per week and Woburn Barrel would sell approximately 150 barrels every 2 to 3 months, to NECC. Some of these barrels contained a mixture of liquid and chemical sludges. NECC also sandblasted barrels for Farrell Barrel, but these barrels had already been burned clean, before they arrived at the plant.

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 14th day of August 2002.


Witnessed by:


Raymond Nadeau