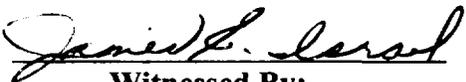


STATEMENT

I, Charlotte Knott, 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 Atlantic Chemical and Metro-Atlantic, from approximately 1945 until approximately 1959. I was employed as the supervisor of the Quality Control Department.**
- 3. The company made chemicals that were used mainly by the textile industry. Types of Chemicals included caustic chemicals, formaldehyde, hexachlorophene, large amounts of waterproofing materials and other types of chemicals. Other chemicals were used in the production process, but I cannot recall their names at this time.**
- 4. The materials were mixed in large kettles. There were at least ten (10) of these kettles used in the process. They were approximately (2) feet high and approximately (2) feet in diameter,**
- 5. As supervisor of quality control, my job involved taking samples from the kettles as the product was being made. These samples were then taken to the Laboratory and tested to make sure that the product met the specifications required of it.**
- 6. After each production batch and the product had been emptied from the kettles, the kettles had to be cleaned, unless we were going to make another batch of the same chemical. If we were making a different type batch, the kettles had to be cleaned before they could be reused. The waste material from the kettles was drained into the Woonasquatucket River. The kettles were then washed with hoses and water. When they were clean, the waste water and residue in the kettles were drained into the river by opening some valves, that allowed the water and waste from the kettles to drain into the pipes, which emptied into the river.**
- 7. This disposal of waste, into the river, occurred on a daily basis, each time one (1) or more of the ten (10) kettles were cleaned.**
- 8. Bad batches of material that could not be saved, were also dumped down the drains from the kettles into the Woonasquatucket River.**

9. On all occasions, barrels that had contained chemicals were rinsed with water and reused. This wastewater was also drained into the river.
10. I have observed animals (fish) in the river die. When they came in contact with the chemical waste from the plant, they would just turn belly-up and die.
11. Once, something happened, a fifty-five (55) gallon drum filled with some type of chemical spilled onto the floor of the plant. It caused a fog, inside and outside of the building. The fog was so thick, in the building, you couldn't see through it. The workers had to cover their faces with towels dipped in water and exit the building. Once outside of the building, the fog was there also.
12. There was a food store(First National Supermarket) located across the street, the gaseous fog, from the plant, got into their refrigeration unit, contaminating the refrigerated foods, which had to be discarded.
13. This gaseous fog or vapor also melted windshield wipers on some of the automobiles driving by the plant.
14. There was a mill in Esmond, R.I. that dumped a lot of "bad stuff" in the river.
15. Bernard Buonanno had his office in the Metro-Atlantic building so I saw him around. "Bernie" didn't like getting his hands dirty. He was not seen on the floor too much so I assumed that he was in his office.
16. I don't know if he (Bernard Buonanno) ran the barrel company or not.
17. Joseph Buonanno ran the chemical shop. He was a great guy to work for.


Witnessed By:

8/22/02 @ 10:40AM


Charlotte Knott