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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN THE MATTER OF:  
CENTREDALE MANOR SUPERFUND SITE                      MP.NO 03-114L

DEPOSITION OF CHARLOTTE E. KNOTT, a Witness in  
the above-entitled case, taken on behalf of CNA  
Holdings, et al., before Linda L. Guglielmo,  
RPR-RMR, a Notary Public in and for the State of  
Rhode Island, on the office of Edwards & Angell,  
2800 Financial Plaza, Providence, Rhode Island on  
Wednesday, February 11, 2004 at 10:00 A.M.

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1 (DEPOSITION COMMENCED AT 10:01 A.M.)

2 CHARLOTTE E. KNOTT

3 Being duly sworn, deposes and testifies as follows:

4 THE REPORTER: Would you state your  
5 full name for the record, please.

6 THE WITNESS: Charlotte Knott.

7 MR. GRAHAM: Before we get started,  
8 housekeeping items, can we first stipulate  
9 objections to form are deemed to be made. Just  
10 otherwise, I'm leading off the deposition but the  
11 petition was filed on behalf of a group. Each of  
12 the attorneys will follow me with questions, and  
13 then we'll turn to everyone else who would like to  
14 ask questions.

15 MR. PELOSO: John Peloso, I represent  
16 New England Container. I talked to Richard  
17 Sherman, I want to let counsel know I filed for  
18 pro hac vice. As of today, it's not been acted on  
19 by the court. I just want to let counsel know  
20 that and see whether counsel had any objection to  
21 me appearing here today, given that situation?

22 (NO RESPONSE)

23 MR. FERROLI: John Ferroli for Eli  
24 Lilly. I've asked Mr. Sherman to take care of

1           that. I don't think it's happened because of  
2           timing. If anyone has an objection, I'd like to  
3           hear it, but it's in progress.

4                           (NO RESPONSE)

5                           MR. FERROLI: Hearing none, let's  
6           proceed.

7                           EXAMINATION BY MR. GRAHAM

8       Q.   Ms. Knott, thank you for being here today, we  
9           appreciate it. My name is David Graham, I  
10          represent CNA Holdings, Celanese Corporation. I'm  
11          going to start the deposition but there will be  
12          some other people asking you questions after I ask  
13          you some questions.

14       A.   Okay.

15       Q.   We'll try not to repeat ourselves, so if it is a  
16          long process, and hopefully we'll get you out in a  
17          reasonable time.

18       A.   Okay.

19       Q.   If you need breaks, please let us know. If you'd  
20          like to just walk around, get something to drink,  
21          whatever you need, be sure and let us know.

22       A.   Okay.

23       Q.   Before we get started, I want to make sure when I  
24          ask questions, that they're clear, and if you

1 don't understand them, you ask me to repeat them  
2 or to clarify them.

3 A. Okay.

4 Q. I understand that you have a little difficulty  
5 hearing, so that may occur at times. I'll try to  
6 speak louder, but you may have to remind me to  
7 speak up. But I will assume if you answer, you  
8 know, if you hear a question, you don't ask for me  
9 to clarify it or repeat it that you understand it  
10 and you will answer to the best of your ability?

11 A. Okay.

12 Q. Is there any reason that you know of that you  
13 couldn't -- you won't be able to give accurate  
14 answers; I mean, for example do you take any  
15 prescription drugs or any kind of thing that would  
16 affect you?

17 A. No, I don't take anything, sir.

18 MR. GRAHAM: Good.

19 A. I'm a healthy person. I stay outside all the  
20 time.

21 Q. That's good. Have you ever been deposed before,  
22 have you ever had a deposition like this, a  
23 situation like this?

24 A. No.

1 MR. GRAHAM: You're in for a treat.  
2 Before we start, perhaps we should go around and  
3 make sure everybody is identified for the record,  
4 as I've introduced myself.

5 MR. SHERMAN: My name is Richard  
6 Sherman, I am counsel for Union Oil Corporation  
7 and for the Original Bradford Soap Works.

8 MR. GRUBBS: Ms. Knott, my name is  
9 Howard Grubbs, and I represent Ciba Specialties.

10 THE WITNESS: You work where?

11 MR. GRUBBS: I represent Ciba  
12 Specialties.

13 MR. BENIK: Good morning, Mrs.  
14 Knott, my name is Greg Benik and I represent two  
15 companies that are involved in this matter.

16 MR. PELOSO: John Peloso, good  
17 morning. I represent New England Container.

18 THE WITNESS: I didn't hear you.

19 MR. PELOSO: I represent New England  
20 Container Corporation.

21 MR. FITCH: Ms. Knott, my name is  
22 Tony Fitch and I represent another company that's  
23 involved in this matter named Emhart, which is  
24 part of Black & Decker.

1 MS. VAUDO: My name is Eve Vaudo, I  
2 represent the United States Environmental  
3 Protection Agency.

4 MR. O'CONNOR: My name is Chris  
5 O'Connor, I represent ADP Marshall.

6 MR. JEDELE: My name is Bret Jedele,  
7 I'm here on behalf of Rhode Island DEM.

8 MR. RICCI: My name is Rich Ricci, I  
9 represent a company named Sanofi Synthelabo.

10 MS. CARNEY: Ms. Knott, my name is  
11 Ann Marie Carney, I represent Bernard Buonanno.

12 MR. FERROLI: John Ferroli  
13 representing Eli Lilly.

14 MR. GRAHAM: We don't expect you to  
15 remember all these people.

16 THE WITNESS: I hope not.

17 MR. GRAHAM: I'd like to have marked  
18 as our first exhibit something I'd like you to  
19 look at, it's a subpoena. We want to make sure  
20 it's why you're appearing here today, and I assume  
21 you or Jim received the subpoena.

22 MR. AUKERMAN: I did. On behalf of  
23 Mrs. Knott.

24 (EXHIBITS 1 & 2 MARKED FOR IDENTIFICATION)

1 EXAMINATION BY MR. GRAHAM (CONT.)

2 Q. What is your full name?

3 A. Charlotte Edith Knott.

4 Q. Where do you live?

5 A. I live in Narragansett.

6 Q. When were you born?

7 A. [REDACTED] [REDACTED]  
8 [REDACTED]

9 MR. GRAHAM: That's fine.

10 Q. Did you graduate from high school?

11 A. Yes.

12 Q. Did you have any schooling after high school?

13 A. No.

14 Q. Did you review any documents to prepare for today?

15 THE WITNESS: Did I prepare any?

16 Q. No. Did you look at any?

17 A. No.

18 Q. Did you speak with anyone besides your own  
19 counsel, Jim Aukerman today. Did you speak to  
20 anybody before you came to the deposition?

21 A. No.

22 Q. Just to Jim?

23 A. Yes.

24 Q. How long has it been since you visited the

1 property where you used to work?

2 THE WITNESS: Where I used to live?

3 MR. GRAHAM: Yes.

4 A. I was up there one day to see my mother,  
5 maybe a month ago.

6 Q. Does she live -- does she live near where you used  
7 to work, your mother?

8 A. Yeah. I lived in Smithfield.

9 Q. Where did you used to work?

10 THE WITNESS: Where did I used to  
11 work. Oh, God, I used to remember where I used to  
12 work up there.

13 Q. I wasn't thinking about the address, the name of  
14 the company you worked for there in Smithfield?

15 A. I don't remember. It's been a long time.

16 Q. Well, I'll go into it. Let's first think about  
17 your employment. After you finished high school,  
18 where did you work your first job, do you  
19 remember?

20 THE WITNESS: First job?

21 MR. GRAHAM: First one that comes to  
22 mind.

23 A. Metro-Atlantic.

24 Q. Do you remember roughly when you went to work for

1 Metro-Atlantic?

2 A. No.

3 Q. Was Metro-Atlantic in Smithfield?

4 A. No, it's not in Smithfield, it's in North  
5 Providence.

6 Q. Was that its only plant or did it have plants  
7 somewhere else, do you know?

8 A. I think it had plants other places but that's  
9 the only one I know. It was out of state, you  
10 know.

11 Q. Was the plant located off Route 44 in North  
12 Providence next to the river?

13 A. Jeez, I haven't been up in North Providence  
14 for a while. I don't remember too much about it.  
15 It went right straight through to Centerdale and  
16 up the corner, further, it was a straight road.

17 Q. Is that Smith Street?

18 A. Smithfield, yes. I lived in Smithfield at  
19 one time. Then I got married and I moved to North  
20 Providence.

21 Q. Okay. What did the plant make, what did it  
22 produce?

23 A. They made chemicals for cloth, changing the  
24 color of the cloth and making it so that it was

1 waterproof or different things like that. It was  
2 a nice company to work for, very nice.

3 Q. How were those chemicals produced, how were they  
4 made?

5 A. They came in in boxes -- in barrels, you  
6 know. We didn't make the chemicals itself, we  
7 bought them and used them.

8 Q. How were they used; were they mixed in some  
9 fashion?

10 A. Yes, they were mixed in a thing to get on the  
11 cloth.

12 Q. The thing they were mixing in, were they called  
13 kettles?

14 A. Yeah.

15 Q. You said the materials came in in barrels?

16 A. Yes.

17 Q. How would you describe how the process of making  
18 it was? Did somebody pour the different amounts  
19 of chemicals?

20 MR. FITCH: Objection.

21 A. That was downstairs, the men did that. I  
22 only checked what was -- how it was going on the  
23 cloth and making sure that it was right before it  
24 went out, that's the only thing I did.

1 Q. Did you ever see the kettles, were they cleaned,  
2 did you see them clean the kettles?

3 A. Oh, God, they were fussy as hell about that.

4 Q. What do you mean by that, they were very fussy?

5 A. They made sure they were washed real clean  
6 before they put something else in them so it  
7 wouldn't get mixed up. They were fussy about  
8 that.

9 Q. How did they wash them, how did they clean them?

10 A. They would start them up with the water in  
11 them and let it move around and then they would  
12 empty it. If it wasn't clean then, they would do  
13 it again.

14 Q. How often did they have to clean them?

15 A. It depended on how many times they had to  
16 change what they were making and that depended on  
17 what had to be -- what they were going to make it  
18 for, companies would say they wanted so much of  
19 this or that, so they would make it for that  
20 company and then somebody else would want  
21 something and they would make it for the next  
22 company. It was changeable.

23 Q. So, could you say how often they were cleaned, was  
24 it once a day, once every two days?

1 A. Oh, sometimes they wouldn't be cleaned for a  
2 week, if we were making it for the same company,  
3 they just keep doing it.

4 Q. It all depended on how it was they changed --  
5 whether they changed what they were making?

6 A. Yes. They were very fussy people to work  
7 for. I enjoyed working there very much. Once in  
8 a while, something would get away on them and then  
9 we'd stink up Esmond, stink up the town a little  
10 bit but it didn't happen too often.

11 Q. When you say get away on them, does that mean it  
12 was spilled or released, what do you mean get away  
13 on them, when something got away?

14 A. Maybe it overflowed or something, you know.

15 Q. A kettle?

16 A. And then maybe somebody was working and  
17 didn't realize that it was time to, you know,  
18 check that one and they were working on the other  
19 one and all of a sudden they would say oh, God.  
20 But it was a very nice company to work for. I  
21 really enjoyed working there. I the only reason I  
22 left is we moved to Narragansett and it was too  
23 far to travel, but it was just a nice place to  
24 work for.

1 Q. When the kettles were cleaned, what happened to  
2 the material that was used to clean it?

3 A. Generally, they were too cheap to do  
4 anything. They put it back in the -- if the stuff  
5 was good, they put it back in the next kettle.

6 Q. The clean material?

7 A. They cleaned the kettle and then they mixed  
8 what they had saved back into the kettle with the  
9 new stuff. They were tight with that, they  
10 wouldn't throw anything out that they didn't have  
11 to.

12 Q. What was -- if they didn't save it, where did it  
13 go, where was it disposed of?

14 A. I think that went down the river. It didn't  
15 go down very often, I will tell you, because they  
16 were tight with money. It was a nice company to  
17 work for. I really enjoyed working there. The  
18 only reason why I left is because we moved to  
19 Narragansett. The house up where we were living  
20 was sold and so we moved to -- we had a place in  
21 Narragansett, we moved down there.

22 Q. You say it went down the river, how did it get to  
23 the river?

24 A. The river was right there, right aside the

1 company.

2 Q. Was there some -- a drain, was there something,  
3 some way from the kettle to get to the river  
4 through a drain?

5 MR. FITCH: Objection to the form.

6 A. The river was right here and the company was  
7 right there. It was no more than five feet away.

8 Q. That's close.

9 A. And then there was two other companies, two  
10 or three other companies up the line that came  
11 down the same way, came down -- there was a river  
12 all the way down and there was two or three other  
13 companies above us that came down there, too. So  
14 it wasn't just our company.

15 Q. You mean -- when you say came down there, what do  
16 you mean?

17 A. They were sending stuff down the river, too.

18 Q. Discharging waste, is that what you mean?

19 A. Yeah.

20 Q. Do you remember the names of those companies?

21 A. No, I don't, but one was in Esmond and one  
22 was in -- oh, God, it's been so long since I've  
23 been up there, another company was above it, I  
24 can't remember the name of that town, but there

1 was -- not just us that was going down there.

2 Q. Sure. I mean --

3 A. They were tight. If they could use it over,  
4 they used it over.

5 Q. Did they sometimes -- did you ever produce any  
6 kind of off spec, bad batch of material, did that  
7 ever happen in the production of chemicals?

8 A. If they did, they would take a little of it  
9 each time and put it in the next batch so it  
10 wouldn't mix it that much, you know. They were  
11 tight with their money and they used everything  
12 they could possibly use over again.

13 MR. GRAHAM: I'd like to have these  
14 marked as exhibits.

15 THE WITNESS: It was a nice company  
16 to work for. I never worked for one that I liked  
17 better. I don't work there anymore because I live  
18 down here, it's too far to go.

19 (EXHIBITS 3 & 4 MARKED FOR IDENTIFICATION)

20 MR. GRAHAM: I'd like to show you  
21 some exhibits. One is a statement and one is an  
22 affidavit.

23 MR. RICCI: One is an affidavit that's  
24 not signed.

1 MR. GRAHAM: On May 10th, 2001, and  
2 one is a statement which she signed on August  
3 22nd, 2002.

4 MR. FITCH: Are they numbered,  
5 David; which is which?

6 MR. GRAHAM: That looks like 4 is the  
7 handwritten.

8 MR. FITCH: Thank you.

9 (WITNESS READING DOCUMENT)

10 THE WITNESS: Yes, that's right. It  
11 was two or three other companies above us that  
12 used to do the same thing. So it wasn't all our  
13 stuff.

14 Q. You mean going into the river, is that what you  
15 mean?

16 A. They were dumping stuff in the river, too.  
17 There was three other companies above us and they  
18 would do quite a bit -- I think quite a bit of the  
19 same kind of thing that we were doing.

20 (WITNESS READING DOCUMENT)

21 Q. You mentioned with respect to the bad batches or  
22 if there was some material made --

23 A. If we made a bad batch of something, what we  
24 used to do, if we could, we'd use a little bit of



1 know, and that changed quite a bit because people  
2 worked awhile and then quit and they came in for  
3 the summer and then left. So, that made it bad  
4 because you had to keep training them. They kind  
5 of sometimes made mistakes, and it would be better  
6 if they hired somebody and kept them there, paid  
7 them a little bit more.

8 Q. Do you remember the names of any of your  
9 co-workers from those days?

10 A. Oh, not now. It's been a long time.

11 Q. How many years has it been since you've seen any  
12 of them?

13 A. Well, I don't go to Smithfield -- I mean, up  
14 there at all, so it's been maybe ten years.

15 Q. Do you recall anybody in particular --

16 THE WITNESS: Any what?

17 Q. Do you recall any of the people that you worked  
18 with, the names of any of them?

19 A. Not now I don't, no.

20 Q. Were you there when the company changed its name?

21 A. I didn't even know it changed.

22 Q. Well, it was called Metro-Atlantic when you were  
23 there, right?

24 A. Yeah. What do they call it now?

1 MR. GRAHAM: Actually, I have to be  
2 careful answering that question, it was later  
3 called Atlantic Chemical Company.

4 THE WITNESS: See, I don't go up  
5 there anymore. I don't drive that much.

6 MR. GRAHAM: There is no plant there  
7 now.

8 THE WITNESS: Oh, it's not in  
9 Centerdale anymore?

10 MR. GRAHAM: No, there are two other  
11 buildings there, but the plant was destroyed.

12 THE WITNESS: I haven't been up  
13 there.

14 Q. What did you -- were you the supervisor of quality  
15 control; is that what your description was?

16 A. I used to go down and get the samples and  
17 check them to make sure that they were made right,  
18 and if they were a little bit off, I told them  
19 what was wrong, and they probably take some of  
20 that and add it in to another batch so it would  
21 even out, because it had to be right for the  
22 companies that they were selling it to.

23 Q. How did you take the samples?

24 A. Just open up the thing and poured it into

1 something and took it upstairs.

2 Q. It was like a valve?

3 A. Yeah. And then I got of kind got tired of  
4 that, so then I said why can't I go -- they used  
5 to have a man that used to bring the stuff up to  
6 me and he left. So I said, do you mind if you  
7 have a girl down here. I said, I don't feel like  
8 running down here every day, I'll come down here  
9 and stay. So, that worked out real well. I used  
10 to make coffee and stuff for them, and they liked  
11 that. So they didn't mind opening a kettle for me  
12 and taking something out.

13 Q. Did you take the material in a jar, container to  
14 some place to be checked?

15 A. I checked it.

16 Q. You actually checked it?

17 A. Yes. It was my business to check it.

18 Q. Was it a laboratory that you would check it in?

19 A. Yes, I worked in the lab. I checked it and I  
20 put it into whatever they use it for, I put it in  
21 and see how it worked.

22 Q. So you could tell from checking whether it worked  
23 properly?

24 A. Yes.

1 Q. Did you use cloth?

2 A. You could tell whether it was the right  
3 color, everything about it. If it had some kind  
4 of funny stuff in it, you'd say, hey, you got to  
5 hold that for a while, and they wouldn't throw  
6 that away, they would just use a little bit every  
7 day. It was a company that was -- they didn't  
8 throw anything away if they could use it.

9 Q. You said materials came in, the raw materials, in  
10 barrels. Did they come in -- did everything come  
11 in in barrels, the chemicals you used?

12 A. Most of the time.

13 Q. Were there railroad cars or were there tank  
14 trucks?

15 A. Sometimes it was dry stuff, so it would be in  
16 a box.

17 Q. Where were these raw materials, I'll call them,  
18 stored when they came in?

19 A. They were stored in the building.

20 Q. So there was an area for storing raw materials?

21 A. Yeah.

22 Q. And after the materials were taken from the drum  
23 or the barrel, what happened to the barrel?

24 A. They were cleaned and we used them over

1           again.

2       Q.    Who cleaned them?

3           A.    The men in the plant cleaned them.

4       Q.    Where would they clean them? Was it in the  
5           building or outside the building?

6           A.    Yeah.

7       Q.    In the building?

8           A.    And they would rinse it off a little bit and  
9           they would put it back into another -- what do I  
10          want to say -- in other words, they used it over  
11          again, is what I'm trying to say. But they would  
12          put a little bit in each one so it wouldn't spoil  
13          the whole thing. It wouldn't spoil it, it would  
14          just be a little bit each time. But they used it,  
15          they were tight. They used everything they could  
16          use.

17       Q.    When they cleaned the drums or barrels, what  
18           happened to the waste material that was left in  
19           the drums, whatever was inside the drums, what  
20           happened to it? Did they use a hose to wash them  
21           out?

22                           MR. FITCH: Objection. Compound.

23           A.    They washed them out, yeah. They were very  
24           fussy about not putting anything down the river.

1           They tried not to put anything in -- if they put  
2           anything down the river, it's because they had to,  
3           but they were very tight about that.

4    Q.    Because they were trying to save what they could  
5           save?

6    A.    They saved everything they could save, and  
7           they didn't want any odors going out in the  
8           street, you know.

9    Q.    But when they cleaned the drums, the barrels, did  
10           the waste material -- where did it end up?

11   A.    They saved it and put a little bit back in  
12           the others, the new ones.

13   Q.    Was it -- well, I guess what I'm saying is, if  
14           the -- you say they used water to clean the drums  
15           out, barrels out. What happened to all that  
16           water?

17   A.    I don't remember, but I don't remember much  
18           going down the river, I'll tell you that much.  
19           They were skimpy people, they didn't want to spend  
20           anything. Good to work for, though, great to work  
21           for.

22   Q.    You said earlier when they cleaned the kettles --

23                           THE WITNESS: What?

24   Q.    Earlier you said when they cleaned the kettles

1 that the waste material went in the river?

2 A. Some of it went in the water.

3 Q. Would that be the same with whatever waste  
4 material was not saved from the drums, would it go  
5 in the river?

6 A. If there was anything that we could save, we  
7 saved it.

8 Q. Right. But what you couldn't save --

9 A. Then it had to go down the river. Then like  
10 those other companies up above, they used to dump  
11 down there, too.

12 MR. GRAHAM: Sure.

13 A. There was three other companies ahead of  
14 us -- behind us, I mean. They came right -- they  
15 dumped down there, too.

16 Q. How were the barrels reused? Did they have the  
17 names of companies on the barrels?

18 A. Yeah.

19 Q. Well, how did Metro-Atlantic reuse the barrels?

20 A. Jeez, I don't remember, but I know they  
21 reused everything they could use. They had trucks  
22 that took the stuff out and delivered it to the  
23 other companies, and they were moving all the  
24 time.

1 Q. Would they put their product, you know, the  
2 product that was made by the company, would it go  
3 into barrels that had the company name on it,  
4 Metro-Atlantic?

5 A. Yeah.

6 Q. So they didn't -- you're saying they didn't ship  
7 off the product in drums that had other people's  
8 name on it, other companies' names?

9 A. No. What was I going to say? They had big  
10 trucks, too, that had -- they filled the truck up,  
11 they didn't have it in a barrel or anything. They  
12 filled the inside of the truck up and took it and  
13 it went out. They had a thing that took it off  
14 the truck. So it was a big -- quite a big outfit.  
15 It was nice to work for, they were great to work  
16 for. I'd probably still be there if I didn't move  
17 down here. It was too damn far to go.

18 Q. When the waste material you've talked about from  
19 either the kettles or the barrels went into the  
20 river, did you see that -- did you actually --

21 A. We reused it. We put a little bit in each  
22 thing, we reused it that way.

23 Q. Did you notice what the effect was, when waste  
24 went into the river on --

1 THE WITNESS: When it went into the  
2 river?

3 MR. GRAHAM: Yes.

4 A. I never saw too much go into the river, you  
5 know, other than wet -- just plain water, you  
6 know. That was -- they cleaned the barrel out as  
7 much as they could, and then they cleaned it at  
8 the end, they washed it again, so that it was  
9 clean for the next time, but there was never very  
10 much going in the river. They were tight.

11 Q. Let me refer you to Number 10 here. Do you  
12 recall --

13 THE WITNESS: 10?

14 Q. Yes, ma'am. Do you recall observing fish dying --

15 A. No -- maybe once or twice I saw something  
16 turn up. I don't whether it was ours or the ones  
17 before us, because they all came down about the  
18 same time.

19 Q. How did you happen to see fish die? I mean, did  
20 you actually -- were you in your office looking  
21 out?

22 A. The window was right there.

23 Q. Was the water colored when the chemicals went in  
24 it?

1 THE WITNESS: Was it cold?

2 MR. GRAHAM: Colored.

3 Q. Did you see any colors in the water?

4 A. No. No.

5 Q. Did you see anything die besides fish?

6 THE WITNESS: Any what?

7 Q. Did you see any animals die besides fish,  
8 according to this?

9 A. No, I never saw anything. That river is full  
10 of fish. That comes from way up above.

11 Q. You mentioned that occasionally, or at least you  
12 mentioned ones earlier that chemical spills in the  
13 plant?

14 A. Yes.

15 Q. What effect did that have on the workers? What  
16 did they do when the situation arose?

17 THE WITNESS: To us?

18 MR. GRAHAM: Yes.

19 A. Nothing much.

20 Q. Did it create any effect when the chemical was  
21 spilled?

22 THE WITNESS: Make us sick or  
23 something?

24 MR. GRAHAM: Or anything visible as

1 a result of that.

2 A. No. They opened up the windows and let  
3 everything -- a lot of things go out. We had a  
4 nice river -- nice windows and it was in the back  
5 of the building, just went out there. It  
6 disappeared pretty quickly.

7 Q. Would you look at Number 11, see if you remember  
8 that incident that you worked on there, that's  
9 Exhibit 3.

10 A. It was foggy, couldn't see out.

11 Q. Do you still remember that happening?

12 A. Yeah. They couldn't drive through  
13 Centerdale.

14 Q. Why couldn't they?

15 A. Because it was all foggy. You couldn't see.  
16 It didn't last long, but everybody was stopped.

17 Q. Did that have any effect on the neighbors or other  
18 businesses, that incident?

19 A. The people that lived around us? There  
20 wasn't too many people living around that place.  
21 It was, you know, business. It bothered the store  
22 next door, though.

23 Q. Is that what you were referring to, Number 12, was  
24 that the First National Supermarket, the store

1 next door you're referring to?

2 A. Yeah, the store. They had to throw some of  
3 the food away.

4 MR. FERROLI: Is that Exhibit 3?

5 MR. GRAHAM: Yes.

6 Q. Did anybody investigate that incident? Did the  
7 police or the fire department, anybody come by and  
8 ask questions?

9 A. Jeez, I don't remember that.

10 MR. GRAHAM: That's understandable.

11 A. It's been awhile. I mean, many of the people  
12 that lived right in town worked there, so they  
13 liked the place.

14 MR. GRAHAM: I understand.

15 A. It was a good paying place, too, to work. I  
16 enjoyed it. I didn't have -- but I used to have  
17 to go down in the plant. Because of where I  
18 worked, I had to go down and see what was going on  
19 and take the stuff -- I used to go down and get my  
20 own stuff to make sure I got what I wanted. We  
21 had a man before that used to bring it up to me  
22 and he left, that's when I started going down.  
23 They were kind of upset about that because they  
24 thought they were going to have to open the cans

1 and get me the stuff, but I said, no, if I'm going  
2 to do it, I'm going to do it all then I know that  
3 if it's wrong, it's my fault, and then I had to go  
4 down and do it again.

5 Q. When you were working there, was there any other  
6 business nearby besides Metro-Atlantic, was there  
7 another business there?

8 A. No. Because it was -- there was a big market  
9 there, you know, a grocery market, and then it was  
10 just a regular town.

11 Q. Was New England Container Company located next  
12 door?

13 A. New England Container, they made the barrels  
14 or did the barrels. They didn't make them, they  
15 cleaned them, and they got barrels from somewhere  
16 else and they used to clean the barrels and fix  
17 them and then use them.

18 Q. Do you know where they got their barrels; did they  
19 get any from Metro-Atlantic?

20 THE WITNESS: At Metro-Atlantic?

21 Q. Did they get some barrels from there?

22 A. I don't remember where they got them. I was  
23 just doing the work for the actual -- what's going  
24 out. I didn't care what was coming in.

1 Q. Do you remember working with someone who prepared  
2 these -- the affidavit which is Exhibit 3 and the  
3 statement, Exhibit 4? I realize it's 2001 and  
4 2002, but do you remember the circumstances under  
5 which these were prepared?

6 A. No, I don't remember. It's been a long time.

7 MR. GRAHAM: I understand.

8 Q. Let's look at the statement --

9 A. I liked the company very much, it was very  
10 nice to work for.

11 MR. GRAHAM: I understand. It's  
12 fortunate to work for somebody you like.

13 THE WITNESS: Yes.

14 Q. I'd like to go through this to see if this all  
15 seems accurate to you.

16 A. Okay.

17 Q. Let's use Exhibit 3, it's probably easier for you  
18 to read because it's typed, easier for me to read  
19 than the handwritten document. The first one says  
20 that these statements were made on the basis of  
21 your personal knowledge and observation; is that  
22 correct?

23 A. Yes.

24 Q. Second one says that you were employed by Atlantic

1 Chemical and Metro-Atlantic from 1945 to about  
2 1959?

3 A. Yes.

4 Q. Does that sound accurate?

5 A. Yup.

6 Q. And you were the supervisor of the quality control  
7 department?

8 A. Yup. I used to go down and get the samples,  
9 bring them upstairs and check them, make sure they  
10 were right before they went out.

11 Q. The third one says the company made chemicals that  
12 were used for the textile industry. You had some  
13 particular chemical, it mentions caustic  
14 chemicals, formaldehyde, hexachlorophene?

15 A. Those stinky things, yeah.

16 Q. That's accurate, then?

17 A. Yes.

18 Q. Do you remember any other chemicals besides those?

19 A. Not that I remember.

20 Q. The fourth one says the materials were mixed in  
21 large kettles?

22 A. Yes, they were.

23 Q. You said there were ten of those kettles in the  
24 process; is that accurate?

1 A. Yup.

2 Q. You say here they were two feet high, about two  
3 feet in diameter; does that sound about right?

4 A. Yeah. Yeah.

5 Q. Of course, you just got through telling us that  
6 you took the samples, Number 5, from the kettles  
7 and that you took them to the laboratory. You  
8 just got through telling us that?

9 A. Yes.

10 Q. The sixth one says that after each production  
11 process, the product had been emptied from the  
12 kettles, the kettles had to be cleaned, unless  
13 they were going to make another batch of the same  
14 chemical?

15 A. Yeah.

16 MR. FITCH: Objection. Asked and  
17 answered.

18 A. They had to wash them and sometimes that  
19 stuff went outside.

20 Q. As you said earlier, that --

21 A. If it was really thick and it was good, they  
22 would put a little bit back in the other kettles,  
23 but if it was too wet, too much water in it, then  
24 they had to --

1 MR. FERROLI: Had to do what, I'm  
2 sorry? I didn't get the answer, she said had to  
3 do. What did they do with it when they -- if had  
4 too much water?

5 THE WITNESS: They probably save  
6 some of it and then put a little bit in each time,  
7 but if they had really too, too much, then he'd  
8 let it go, but they generally let it go at night.

9 MR. FERROLI: Let it go into the  
10 river?

11 THE WITNESS: Yeah. They didn't do  
12 that very often.

13 Q. So, would you read Number 6. Is that accurate  
14 what you said in Number 6?

15 MR. FITCH: Objection. Asked and  
16 answered.

17 A. Yeah. That's right.

18 MR. RICCI: What exhibit are you  
19 reading from?

20 MR. FITCH: Exhibit 3.

21 MR. GRAHAM: 3.

22 Q. The seventh one. It talks about each time the ten  
23 kettles were cleaned, that the disposal of waste  
24 in the river occurred on a daily basis; is that

1 correct?

2 MR. FITCH: Objection. Asked and  
3 answered.

4 THE WITNESS: What did you say?

5 Q. I was wondering if Number 7 looked correct to you?

6 A. Yeah.

7 Q. And Number 8, we did get into that before, but is  
8 it correct?

9 MR. FITCH: Objection. Asked and  
10 answered.

11 THE WITNESS: Number 8?

12 MR. GRAHAM: Yes, ma'am.

13 A. Yeah.

14 Q. Thank you. Now just a couple more here.

15 THE WITNESS: There's another page?

16 Q. This is Number 9. Is that accurate as well?

17 MR. FITCH: Objection. Asked and  
18 answered.

19 A. Yes. Reused.

20 Q. And number --

21 A. Yeah. They reused everything they could.

22 Q. I'm just trying to confirm Number 10, does that  
23 look accurate?

24 MR. FITCH: Objection. Asked and

1 answered.

2 A. Yeah, once in a while a fish would die. They  
3 tried not to do that, but sometimes you just had  
4 to get rid of it.

5 Q. Number 11, I think you spoke about that, Number 11  
6 the way it's written described that incident we  
7 talked about accurately?

8 MR. FITCH: Objection. Asked and  
9 answered.

10 A. Yeah, I remember that. It got so damn foggy  
11 we couldn't see in the building. Yeah, that  
12 happened, but that only happened I think once,  
13 maybe twice. Sometimes we had new people come in  
14 to work and they weren't fully trained yet and  
15 they screwed up. So, we had to watch out for  
16 them.

17 I was upstairs a lot of the time, but then it  
18 was easier if I went downstairs and worked with  
19 them, and at first they didn't like that, they  
20 didn't like to have a woman down there, but they  
21 thought they were going to have to open the  
22 kettles for me and do this, that and the other  
23 thing, but I opened my own kettles, I knew what I  
24 was taking out. And they got used to it, they

1           didn't mind it anymore.

2       Q.    And Number 12, does that describe accurately what  
3           we just got through speaking about.

4                       MR. FITCH:  Objection.  Asked and  
5           answered.

6       A.    Across the street we fogged them up.  We did  
7           that.

8       Q.    How about Number 13, I haven't asked you about  
9           that one.

10                       THE WITNESS:  What?

11      Q.    Number 13, do you recall, is that accurate what  
12           happened there, what you say happened there?

13      A.    Yes, we fogged up the windshields.  Yeah,  
14           that happened.  See, it was right in the middle of  
15           the town.  It was a bad place to have it.  We had  
16           a nice river there.

17      Q.    This is your signature, you recall, this is your  
18           signature, Mrs. Knott, at the bottom there?

19      A.    Yeah, that's my signature.  It was a nice  
20           place to work, it really was, but it was stinky  
21           sometimes.

22      Q.    Exhibit 4 there is one item I'd like to ask you  
23           about in that one.

24      A.    Oh, God.

1 MR. GRAHAM: We won't make you read  
2 all of that.

3 THE WITNESS: How do I read this?

4 Q. If you read that one sentence, Number 5 on the  
5 third page; is that accurate?

6 A. The company made -- what's that? I can't  
7 read it.

8 MR. GRAHAM: Hexachlorophene.

9 A. Oh, hexachlorophene. Yeah, they did make  
10 hexachlorophene. They didn't make that very  
11 often. I forgot who they made that for. It's  
12 been a long time.

13 MR. GRAHAM: We understand. You've  
14 been very patient. I hope your patience can  
15 continue.

16 Q. I guess the only other question I have right now  
17 is do you know anything about the relationship or  
18 how New England Container and Metro-Atlantic were  
19 related?

20 A. No, I didn't know that.

21 MR. PELOSO: Objection.

22 Q. If they were related?

23 A. The barrel company, yes, they were related,  
24 but I don't know how. One place made the barrels

1 or they made barrels for other companies, too, but  
2 we got their barrels and, yeah, we were related  
3 somehow, I don't know that.

4 MR. GRAHAM: Before we turn to the  
5 next questioner, would you like to have a break?  
6 Would you like to get some water or something?

7 THE WITNESS: No, that's all right.

8 (BRIEF RECESS)

9 MR. SHERMAN: I have no questions.

10 EXAMINATION BY MR. GRUBBS

11 Q. Ms. Knott, good morning.

12 A. Good morning.

13 Q. My name is Howard Grubbs, we met earlier. Let me  
14 ask you, when you worked at Metro-Atlantic, do you  
15 remember who your immediate supervisor was?

16 A. It's a long time. No, I don't remember.

17 Q. Do you remember any of the people you worked with,  
18 either above you or any of your co-workers?

19 A. I don't really remember their names now.

20 It's been a long time.

21 Q. I understand. How about anybody in production, do  
22 you remember anybody's name in the production  
23 area?

24 A. No, but I was always down there.

1 Q. Did you ever go to the chemical shop?

2 A. Yup.

3 Q. Do you know who ran that?

4 A. No. I don't remember any of the names, any  
5 of them. But I worked in there, I used to go down  
6 and get all the samples, and I used to bring them  
7 up and test them. That was my job, to make sure  
8 they were right.

9 Q. Let me ask you to look at what's been marked as  
10 Exhibit 3 which is the typed statement.

11 THE WITNESS: What do you want me to  
12 do?

13 Q. I would like you to look at the very last  
14 paragraph, Paragraph 17. If you would just take a  
15 second and read that.

16 (PAUSE)

17 A. Yes, he was there.

18 Q. Does that refresh your recollection?

19 A. Yes, he was. He was a great guy to work for.

20 Q. Is Paragraph 17 accurate?

21 THE WITNESS: Is it active?

22 MR. GRUBBS: Accurate.

23 A. Yes, very accurate.

24 Q. What do you remember about Mr. Buonanno?

1 MS. CARNEY: Objection.

2 A. He was a great guy to work for and he always  
3 helped you.

4 MS. CARNEY: Can we have the record  
5 reflect --

6 A. He didn't tell you to --

7 MS. CARNEY: Can the record please  
8 reflect Ms. Knott's testimony is regarding Mr.  
9 Joseph Buonanno.

10 MR. GRUBBS: I think that's what  
11 Paragraph 17 says.

12 A. He was a great guy to work for. He didn't  
13 just tell you to do something, he helped you.

14 Q. How was the product shipped out of Metro-Atlantic,  
15 the finished product?

16 A. Finished product was put in barrels, and it  
17 was put on a truck.

18 Q. What did the barrels say on them?

19 A. Oh, God, I don't remember.

20 Q. Did they have the name of Metro-Atlantic?

21 A. Oh, yeah. Oh, yeah.

22 Q. What color were they?

23 A. Kind of a green -- kind of brown. I think  
24 they were brown.

1 Q. They were brown?

2 A. Yeah.

3 Q. Did you ever go over to New England Container  
4 Company?

5 THE WITNESS: Did I ever go over to  
6 the container company where they made the barrels?

7 MR. GRUBBS: Yes, ma'am, did you  
8 ever just go to that company.

9 A. I worked in that company.

10 Q. I'm talking about New England Container, not  
11 Metro-Atlantic.

12 A. Oh, the container company?

13 Q. Yes, ma'am. Did you ever go to the container  
14 company?

15 A. No. They brought the barrels in to us. We  
16 had barrels all over the place.

17 Q. They brought barrels to Metro-Atlantic?

18 A. Yeah. They came empty and we'd fill them up.

19 Q. What did you fill those barrels with?

20 A. The stuff that we were making.

21 Q. The finished product?

22 A. Yeah.

23 Q. Who is they? You said they brought the barrels?

24 A. I don't remember who brought it. It was a

1           company that brought it in. I don't remember  
2           those things. It's been a long time.

3    Q.    I understand. Who painted the barrels?

4    A.    I don't know who painted them. What's going  
5           on here? It was a great company to work for.

6                           MR. GRUBBS: I don't have any  
7           further questions, ma'am.

8                           THE WITNESS: You don't have what?

9                           MR. GRUBBS: Any further questions.  
10          I'll pass.

11                          THE WITNESS: It was a great company  
12          to work for.

13                           EXAMINATION BY MR. BENIK

14    Q.    Hi, Mrs. Knott, my name is Greg Benik. Can you  
15           hear me, by the way?

16    A.    Not too good.

17    Q.    I'll try to keep my voice up. I just have a few  
18           questions.

19    A.    I can read lips better than I can hear.

20    Q.    I just wanted to ask you, did you speak to  
21           anybody, aside from your lawyers, before this  
22           deposition?

23    A.    Before I came here? No.

24    Q.    About this deposition?

1 A. No.

2 Q. Have you ever spoken -- do you recall speaking to  
3 anybody about an EPA investigation regarding the  
4 operations at the facility where you worked?

5 A. No, I didn't know what was going on. I just  
6 ignored it.

7 Q. Do you recall participating in any discussions  
8 with anybody at all regarding an EPA investigation  
9 regarding the activities at the plant?

10 A. No.

11 Q. Do you have any recollection at all with respect  
12 to Exhibits 3 and 4, which are these two  
13 statements -- strike that. Do you have any  
14 recollection at all participating in the  
15 preparation of those?

16 A. No. It's been a long time I've been away  
17 from that place.

18 Q. But I'm just kind of curious, because these were  
19 prepared only a few years ago. Do you see, for  
20 example, on Exhibit 3 that's your signature,  
21 right?

22 A. Yup, that's mine.

23 Q. Okay. And I'm just curious because it's dated  
24 2002; that's two years ago, right?

1 A. Yeah. It is two years ago.

2 Q. Do you have any recollection as you sit here today  
3 about how you came to sign that document?

4 A. I don't remember anything about it.

5 Q. No recollection?

6 A. Joe Buonanno. He was a great guy to work  
7 for.

8 Q. I'm just asking you, I'm asking you to think back,  
9 if you can, to 2002 and tell me, if you would, if  
10 you have any recollection of signing this  
11 document?

12 A. Well, I signed it because it definitely is my  
13 writing.

14 Q. Okay. And do I take it then that you read the  
15 document before you signed it?

16 A. Oh, yeah.

17 Q. Okay. And do I take it that you agreed with all  
18 of the statements in the document before you  
19 signed it?

20 A. Of course. I wouldn't sign it if I didn't  
21 read it and agree with it. It was a great company  
22 to work for.

23 Q. Why do you say that?

24 A. It was.

1 MR. BENIK: I'm curious, I've never  
2 been able to say that in all my years of working.

3 A. I was there a long time, but when I moved  
4 down here, it was just too damn far to go.

5 Q. You know, you said you saw that the large vats  
6 discharged material into the river; is that  
7 correct?

8 A. Sometimes.

9 Q. Can you tell me roughly how often that took place?

10 THE WITNESS: What?

11 Q. How often did you observe that?

12 A. Oh, at least once a week.

13 Q. At least once a week. Would that be once a week  
14 for the entire time of your employment?

15 A. Yeah. They had to clean the place out once  
16 in a while.

17 MR. BENIK: I see.

18 A. They had to put it somewhere.

19 Q. How big were those vats?

20 THE WITNESS: What?

21 Q. How big were they?

22 THE WITNESS: The vats?

23 MR. BENIK: Yes.

24 A. It would probably take about an hour to go

1 through.

2 Q. Were they 20 feet tall?

3 THE WITNESS: What?

4 Q. Were the vats 20 feet tall?

5 THE WITNESS: 20 feet tall?

6 MR. BENIK: Yes.

7 A. No.

8 Q. Could I fit in one?

9 THE WITNESS: What?

10 Q. Could I fit in one. Could I go into one of these  
11 vats?

12 A. Oh, yeah. Yeah. You don't want to, though.

13 Q. I wouldn't think I would. I'm trying to get a  
14 sense of how big they are. Tell us how big they  
15 were, we're curious about the size.

16 A. It's been awhile.

17 Q. I know it. But you worked there a long time and  
18 you saw them frequently?

19 A. Yes.

20 Q. Give us your best sense of how big they were?

21 A. Well, they were a little taller than me.

22 Q. How wide were they?

23 A. Oh, maybe about that big (indicating).

24 Q. So about three or four feet?

1 A. No. They were easy to move if you had to  
2 move them.

3 Q. Okay. How many vats were there, do you remember?

4 THE WITNESS: How many were there?

5 MR. BENIK: Sure.

6 A. It depended on how much they had to make for  
7 people. Sometimes the place was full, the whole  
8 building was full.

9 Q. Full of vats?

10 A. The next time it might be just half full.

11 Q. My question is not very clear. I'm just trying to  
12 understand how many vats there were in the whole  
13 building?

14 A. Oh, in the whole building? Maybe 15 or so.

15 Q. And as a general proposition, were all the vats  
16 used every day?

17 A. No.

18 Q. As a general proposition, how many vats were  
19 filled on any given day?

20 THE WITNESS: Every day?

21 MR. BENIK: Yes. On any given day.

22 A. Jeez, I can't remember, but it seems like I  
23 was awful busy fixing them.

24 Q. What did you do actually; you went to each vat and

1           drew samples so you could analyze in your lab?

2           A.    Yes.

3    Q.    What did you analyze for, do you remember the  
4           chemicals you looked for?

5           A.    No, I don't remember that either.

6    Q.    You have no recollection of that?

7           A.    No.  It's been a long time.

8    Q.    I know.  What kind of tests did you run on those  
9           samples; do you remember that?

10          A.    No.

11   Q.    You remember nothing about your work back then?

12          A.    No.  It's been a long time.

13                           MR. BENIK: I know it's been a long  
14           time.

15          A.    It was a nice place to work.

16   Q.    I know.  Did you take the samples in a laboratory,  
17           a chemical laboratory?

18          A.    I would go down the plant and get the sample  
19           and take it upstairs and do it in my lab up there.

20   Q.    In your laboratory?

21          A.    Yeah.  And then I got tired of doing that, so  
22           I decided to move everything down there, it was  
23           easier.  Because the boys didn't want to bring it  
24           up, and I didn't want to keep running down, so I

1           went down there and worked with them.

2    Q.    Did you like to work with them better?

3    A.    Yeah, I liked working with the men.

4                   MR. BENIK: I like to work with  
5           women, maybe we have something in common.

6    Q.    Let me ask you this, I'm curious about how big was  
7           the sample you took that you did your test on.

8    A.    It was only maybe that full.

9    Q.    And did you add anything to the sample to  
10           determine -- to run your test?

11   A.    No. Just do the test itself.

12   Q.    What was it?

13   A.    I kind of don't remember too much of what I  
14           did, but I remember I had to do it and I had to go  
15           down and tell them if it was -- if it wasn't  
16           right, they had to fix it. Sometimes they had to  
17           mix it with -- take a little bit of it and put it  
18           in another one each time to make it even.

19   Q.    What would make a test wrong in your -- you said?

20   A.    You want me to remember things I don't  
21           remember.

22   Q.    If you can. I'm curious about the tests that you  
23           ran and what you were looking for, that's all.

24   A.    I just -- they gave me a bunch of things they

1 wanted tested and I just did what they told me.

2 Q. Were you testing for color?

3 A. Not too much color in that stuff. It was  
4 mostly all clear.

5 Q. Were you testing for the --

6 A. So it wouldn't be too strong so that it  
7 wouldn't ruin what they were using.

8 Q. I see. Were you testing for acidity, whether it  
9 was acid or not?

10 A. Jeez, I don't really remember what I was  
11 doing. It was a long time.

12 Q. You don't remember whether you had to add anything  
13 to your -- to perform your job?

14 A. I never had to add anything. I just had to  
15 make sure what they sent me up was right. If I  
16 found something that was really bad, I told them  
17 they had to go fix it. They generally dumped it  
18 in something else.

19 Q. Did you have any chemicals in your laboratory?

20 THE WITNESS: What?

21 Q. Did you have any chemical containers in your  
22 laboratory?

23 A. Yeah. I had a lot of chemicals in my  
24 laboratory. Don't ask me what they were, I don't

1 remember.

2 Q. What did you use the chemicals for?

3 A. I don't remember that either. It's been a  
4 long time that I left there. I moved down to  
5 Narragansett, so it was too far to go. It was a  
6 nice place, though. Nice job.

7 Q. Can we go back to the 15 vats?

8 THE WITNESS: The 15?

9 MR. BENIK: The 15 vats in the  
10 plant.

11 A. Oh, God, yeah, they had 15. That building  
12 was full.

13 Q. Full of vats?

14 A. A lot of them.

15 Q. How big was the building?

16 A. Quite a few -- oh, it was a big building.  
17 Came from the road way, way, way back and the  
18 water was right alongside of it.

19 Q. Did all of the vats discharge into the river, to  
20 your recollection?

21 A. Well, if they didn't have -- if they could  
22 use it over again, they damn well didn't dump it  
23 because they were too cheap. They would save it  
24 and use it over.

1 Q. I understand. But you did tell me that you saw  
2 the vats being discharged into the river once a  
3 week, correct?

4 A. Yes, at times, it had to be.

5 Q. Right. And did all -- were all the vats connected  
6 to the river for discharge purposes?

7 A. Yeah, they were all -- they would all go into  
8 the river. That's the only place they could go.

9 Q. Okay. Who put -- what was put into these vats,  
10 anyway, Mrs. Knott?

11 A. It was chemicals for doing cloth, you know,  
12 making cloth right, making -- they made all kinds  
13 of -- it went on all kinds of cloth. It was  
14 nice -- it used to -- some of it used to stink a  
15 lot because it had a lot of formaldehyde in it.

16 Q. Who put the chemicals into the vats?

17 THE WITNESS: What?

18 Q. Who put the chemicals into the vats?

19 A. The men downstairs.

20 Q. How did they put the chemicals into the vats?

21 A. They just poured it in, what they needed,  
22 they poured in.

23 Q. Did they pour it out of a big drum?

24 A. No, no, no. They had things that they could

1 get out of the big drum, they could get what they  
2 wanted with a scoop with a handle on it and put in  
3 what they wanted.

4 MR. BENIK: I see.

5 A. They wouldn't spill any.

6 Q. You told Mr. Graham you couldn't remember any of  
7 the chemicals. Now that we've talked about this,  
8 does that refresh your memory at all?

9 A. I don't remember what they were, but I know  
10 they used to come up to me, or toward the end, I  
11 was down there. It was too much trouble walking  
12 up and down. There was a man that used to bring  
13 things up to me and he left, so then it was up and  
14 down, up and down. I said the hell with this, I'm  
15 going downstairs, so I moved downstairs.

16 MR. BENIK: I don't blame you.

17 A. And I worked with them.

18 Q. When the chemicals came into the plant, were they  
19 in 55-gallon drums?

20 THE WITNESS: When it came into the  
21 plant?

22 MR. BENIK: Yes.

23 A. They came in in different sizes, depending on  
24 what it was. Some were big ones and some were

1 smaller ones.

2 Q. Where were those drums and containers stored  
3 before they were used in the vats?

4 A. In the very back of the building.

5 Q. If you were to go back to that building on any  
6 given day, how many drums and containers would you  
7 observe?

8 THE WITNESS: Would be there?

9 MR. BENIK: Yes.

10 A. Jeez, I don't know, probably 25 or 30.

11 Q. Were any drums or containers stored anywhere else  
12 on the property?

13 A. Not that I know of.

14 Q. Did you ever observe any drums or containers  
15 stored outside?

16 A. No.

17 Q. Did you ever see any drums or containers stored  
18 near the banks of the river?

19 A. Could be pretty close to the river, but it  
20 would be inside the building.

21 Q. Do you recall ever seeing any floor drains in the  
22 building?

23 THE WITNESS: Any what?

24 MR. BENIK: Floor drains.

1 A. No, there wasn't any drains that I remember.

2 Q. Okay. You mentioned that there were companies  
3 upstream that were discharging into the river?

4 A. Yup.

5 Q. Do you know the names of those companies?

6 A. No.

7 Q. Did you ever actually see those companies  
8 discharge material into the river?

9 A. Well, stuff came down the river. I mean,  
10 sometimes we would just -- and the other stuff was  
11 coming in, too, it was two or three other -- three  
12 other companies above us, one in Centerdale, one  
13 in Georgiaville and then there was another one way  
14 up. They all used to come down there.

15 Q. In your statement you mentioned that there was a  
16 mill in Esmond, Rhode Island. Where is Esmond,  
17 Rhode Island?

18 THE WITNESS: Esmond?

19 Q. Was that one that you're thinking of?

20 A. Esmond is where I -- our school was there.  
21 Esmond was just -- wait a minute. It's been  
22 awhile since I lived up there. I could go up  
23 there and find it right away, but I can't remember  
24 saying where it actually was. If I was driving up

1           there, I'd find it right away.

2       Q.    Did you ever receive any communications from any  
3           of the neighbors regarding the operations of the  
4           plant?

5                        THE WITNESS:  You mean being stinky  
6           or something?

7                        MR. BENIK:  Yes.

8       A.    I never remembered anybody complaining about  
9           it.  That company was very fussy about things like  
10          that.  They didn't want to waste anything.  They  
11          used everything they could possibly use.

12      Q.    Did you ever see any material that was buried in  
13           the ground?

14      A.    No.

15      Q.    On the property?

16      A.    No.

17      Q.    Have you ever heard of anything like that?

18      A.    No.  First of all, the ground was harder than  
19          a rock.

20      Q.    Did you ever observe any pouring of materials on  
21           the ground?

22                        THE WITNESS:  Pouring it on the  
23           ground?

24                        MR. BENIK:  Yes.

1           A.    Once in a while if they had something that  
2           was real messy and they couldn't do anything with  
3           it, they poured it, but they always poured just a  
4           little at a time.  They never poured a lot.  
5           Waited until it cleaned up and they poured a  
6           little more.  There were like three other  
7           companies above us that also poured, so it wasn't  
8           just our company.

9        Q.    When you say your company was pouring on the  
10       ground, can you describe what it was?

11       A.    A lot of formaldehyde.

12       Q.    How did that poured material smell to you?

13       A.    Stinks.

14       Q.    Where was that material poured vis-a-vis the  
15       river?

16       A.    Right beside our building.

17       Q.    How far from the river was that?

18                        THE WITNESS:  How far from the  
19       river?

20                        MR. BENIK:  Yes.

21       A.    Poured it there, and the river was right  
22       beside us.  It went right straight down.  The  
23       river couldn't be more than six or eight feet away  
24       from our building.

1 Q. How frequently did that happen, Mrs. Knott?

2 A. At least twice a week.

3 Q. Did that happen twice a week during the entire  
4 time of your employment?

5 A. Well, sometimes they weren't working as hard  
6 as they were before or something. Yes, I would  
7 say the whole time, but it was a nice company to  
8 work for.

9 Q. Who was your favorite boss?

10 A. Who was my favorite boss? I don't even  
11 remember who was there. If I went in there, I'd  
12 probably know the minute I see their face, I'd  
13 probably remember their name.

14 Q. I thought since you said it's such a nice place to  
15 work, I thought you might have had a favorite  
16 boss.

17 A. I didn't mind any of them, they were all  
18 pretty good.

19 Q. No favorite?

20 A. No. See, I was upstairs and downstairs.  
21 Upstairs was the higher level of people and  
22 downstairs, I would go down there, but the guys  
23 downstairs were very nice.

24 Q. Mr. Joseph Buonanno ran the plant you said when

1           you were there; is that correct?

2           A.    Yes.

3    Q.    Who was kind of the next in command under Mr.  
4           Buonanno, do you remember?

5           A.    Mr. Buonanno was nice.

6                           MR. BENIK: I know that.

7           A.    They were all nice in there.

8    Q.    You don't remember who --

9           A.    I don't remember their names. It's been a  
10           long time. If I went in and probably saw their  
11           faces, I'd probably recognize them.

12   Q.    Aside from the two times that you met with  
13           somebody to prepare these Exhibits 3 and 4, have  
14           you had any other discussions with anybody  
15           regarding what's been characterized as an EPA  
16           investigation regarding this plant?

17           A.    No. It was a nice place to work. I enjoyed  
18           working there very much, but I moved down here and  
19           who the hell wants to drive all the way up there.  
20           But it was a great place to work. We stunk up the  
21           place once in a while when we dumped something  
22           out. There was three more up above us, so they  
23           helped, too.

24   Q.    When there was an incident that, in your words,

1 stunk up the place, what did Mr. Buonanno do, Mr.  
2 Joseph Buonanno?

3 A. Well, he tried to do whatever he could to  
4 correct it or calm it down or something. Other  
5 things they could put on to kind of push it down.

6 Q. You mean like other materials?

7 A. Something lighter, you know, that smelled  
8 better, cover up the stinky stuff. Once in a  
9 while it would be real stinky. It was stinky  
10 inside, too. It was a nice place to work.

11 Q. So, when there was an incident that kind of stunk  
12 up the building, other material was used to  
13 moderate the smell?

14 A. Yes. Kind of cool it down or we'd stop right  
15 away and let everything go out before we continued  
16 on.

17 Q. Was that a liquid -- was a liquid used to control  
18 the odors?

19 A. Yeah, sometimes it was liquid. I can't  
20 remember all this, you know. I remember doing it,  
21 but I don't remember what we used.

22 Q. Right. Do you remember if it was a powder also?

23 THE WITNESS: What?

24 Q. Was a powder ever used?

1 A. Not that I remember. It was a nice company  
2 to work for, but once in a while -- the other  
3 companies up above helped out, they stunk, too.  
4 If we both came down together, boy, it was really  
5 bad.

6 Q. I'm curious, you say these other companies. Were  
7 you ever in those facilities?

8 THE WITNESS: What?

9 Q. Were you ever in those plants up the river?

10 THE WITNESS: In those plants  
11 lately?

12 MR. BENIK: No, back when you were  
13 working at Metro.

14 THE WITNESS: After I left?

15 Q. During the time period when you were working at  
16 Metro-Atlantic, were you ever physically present  
17 in the plants upstream you've been referring to?

18 THE WITNESS: I can't understand  
19 what you're saying.

20 Q. You've talked about these three plants upstream?

21 A. Yeah.

22 Q. While you were working at Metro-Atlantic, were you  
23 ever in those upstream plants?

24 A. No.

1 Q. Did you ever have any personal observation of any  
2 discharges from those plants?

3 A. Well, sometimes, you know, something would be  
4 coming down red. I don't know why the red, but  
5 something would come down red and you'd look out  
6 the window and you say what the hell is coming  
7 down red. We didn't know. It must have been some  
8 kind of paint they were making or something they  
9 were using, dumping it down, but it was bright,  
10 bright red.

11 Q. So that's kind of your -- that's why you tell us  
12 these three plants were also a problem on the  
13 river?

14 A. Yeah. There was three plants ahead of us.  
15 They were all quite aways apart, but they were up  
16 there.

17 Q. Were there any big underground storage tanks on  
18 the property?

19 A. Not that I remember or that I knew of.  
20 Metro-Atlantic, if they could use it over again,  
21 they used it over again. They wouldn't -- they  
22 wouldn't get rid of anything that they could use.

23 Q. Do you remember observing any fires that took  
24 place in the plant?

1 A. No, never any fires that I remember. There  
2 was nothing to make a fire.

3 Q. Do you ever recall any spills of chemicals within  
4 the building itself?

5 A. Well, once in a while the guys would dump the  
6 stuff and dump it in the wrong -- dump it and not  
7 be watching, dump too much in and then you have a  
8 pile -- stuff all over the place, then they had to  
9 clean it up.

10 Q. How would they clean it up?

11 A. They would get it all together and wash it  
12 down and out the river.

13 Q. I see. How frequently would that happen?

14 A. Not very often. The boss would kill them.

15 Q. What boss would that be?

16 (WITNESS LAUGHING)

17 (PAUSE)

18 Q. Whoever it was?

19 A. He was a very tight man on his stuff. He  
20 wanted to keep it all.

21 Q. Who is that, Mr. Buonanno?

22 A. Joe Buonanno. Didn't want to waste anything.  
23 Nice guy, though. I enjoyed working for him very  
24 much.

1 Q. Aside from what we've talked about, do you  
2 remember any other incidents where materials at  
3 the plant got into the river?

4 A. Got into the river? I suppose it did once in  
5 a while, something would break or something and  
6 they would have to catch it, you know, stop it.

7 Q. Do you have any particular incident in mind when  
8 you say this, Mrs. Knott?

9 THE WITNESS: Any particular one?

10 MR. BENIK: Yes.

11 Q. Or is this just a general recollection over the  
12 course of your employment?

13 A. Just a general. They were pretty tight with  
14 watching that river. But like I say, it came down  
15 from up above, too. There was two other companies  
16 up there. So it was busy.

17 Q. You have no knowledge of any -- of any material  
18 being buried? I guess I asked you that, I'm sorry  
19 if I did.

20 THE WITNESS: Being buried?

21 MR. BENIK: Buried on the property.

22 A. Jeez, I don't think so.

23 MR. BENIK: Mrs. Knott, you've been  
24 very helpful. Thank you so much for answering my

1 questions.

2 THE WITNESS: They tried to use it  
3 over. If there was some stuff in there that they  
4 hadn't used or it was still in the vat and they  
5 hadn't used it, they would save that and put it in  
6 the next one. They were tight with their  
7 supplies. They were great to work for.

8 MR. BENIK: Thanks, Mrs. Knott.

9 MR. GRAHAM: Open the floor to anyone  
10 else who would like to ask questions.

11 EXAMINATION BY MR. FITCH

12 Q. Mrs. Knott, when you first decided to go to work  
13 for Metro-Atlantic, did you interview with  
14 somebody for the job?

15 A. Yes, but I don't remember who.

16 Q. Was it somebody in the lab or somebody in some  
17 other part of the company?

18 A. No, I think it was the boss himself.

19 Q. Look at the same old exhibit, if you would,  
20 please, ma'am, Number 3. It's this one right  
21 here, Mrs. Knott. I've handed you Exhibit Number  
22 3. I want you to look at Paragraph 15, please,  
23 ma'am.

24 (WITNESS READING DOCUMENT.)

1 A. That's true. Yeah, that's true.

2 Q. Do you remember Mr. Bernie Buonanno?

3 A. Bernie Buonanno? Yeah, he was a nice guy.  
4 Great guy.

5 Q. Was Mr. Bernie Buonanno the man who interviewed  
6 you for your job?

7 MS. CARNEY: Objection.

8 A. Jeez, I don't remember who interviewed me. I  
9 think it was a woman that interviewed me.

10 Q. Was that Mrs. Philblad (phonetic)?

11 MS. CARNEY: Objection.

12 MR. FITCH: Let me note for the  
13 record --

14 A. I don't remember.

15 MR. FITCH: In this jurisdiction  
16 objections are only for form, they're not because  
17 someone doesn't like the question. I'm sorry, I  
18 interrupted you.

19 Q. Was it Mrs. Philblad who --

20 MS. CARNEY: Objection. Asked and  
21 answered.

22 A. I don't remember the names.

23 Q. Did Mr. Bernard Buonanno work at the plant?

24 A. He didn't work, but he was there and he

1 watched us like a hawk.

2 Q. Was he in charge of the plant?

3 A. He had men working under him that he kind of  
4 sat back there and watched them, make sure they  
5 did it right.

6 Q. Did you understand him to be supervising the men  
7 who worked under him?

8 A. Yes. I liked him very much.

9 Q. When I asked you did you understand him to be the  
10 supervisor of the men working under him, was your  
11 answer yes?

12 A. Yeah. He was a great guy. The whole gang up  
13 there was nice. It was a nice place to work.

14 Q. Do you recall whether the plant ever manufactured  
15 products based on formulations given to it by  
16 other companies?

17 A. That I don't know. I only did my thing.

18 Q. Did you ever observe whether or not the company  
19 received formulas or formulations or specs from  
20 other companies?

21 A. We made stuff, and it went out to other  
22 companies, but I don't know what companies it went  
23 out to.

24 Q. Do you know if any of the companies that it went

1 out to had told Metro-Atlantic how to formulate  
2 the product?

3 MS. CARNEY: Objection.

4 A. I don't know that either.

5 Q. Did you ever hear the name Thomas Cleary?

6 THE WITNESS: Thomas Cleary?

7 MR. FITCH: Yes.

8 A. No, I never heard that name.

9 Q. Do you remember back when both you and I were a  
10 little bit younger than we are now, there used to  
11 be a product that we would buy called pHisoHex?

12 THE WITNESS: For what?

13 Q. Do you remember a product called pHisoHex, a hand  
14 cleansing material that we would buy or doctors  
15 would use?

16 A. No, I don't remember that either.

17 Q. Do you know if Metro-Atlantic ever manufactured a  
18 product called trifluorin (phonetic)?

19 A. That seems like I remember that name.

20 Q. Do you know --

21 A. See, I was just watching what they were doing  
22 and making sure that this was right. I wasn't  
23 worrying about what was going on out in the  
24 company.

1 Q. I understand that, but we're just trying to find  
2 out some information from you. Do you know what  
3 company trifluorin was manufactured for, if any?

4 A. I remember that name, but I don't remember  
5 who it was manufactured for. Seems to me it was  
6 some -- it was a company that was quite far away  
7 from them, because I know they used to -- the guys  
8 used to crab about taking it down there.

9 Q. When you say down there, was the finished  
10 trifluorin product shipped somewhere to the south?

11 MS. CARNEY: Objection. Lack of  
12 foundation.

13 A. I don't know where it was, but I remember the  
14 guys saying, oh, I got to make that Goddamn trip  
15 again.

16 Q. They said that about every product, every trip?

17 A. They used to get mad because sometimes they  
18 would make it on a Friday, so they would be coming  
19 home on Saturday.

20 Q. Do you remember today what that trifluorin product  
21 was used for?

22 MS. CARNEY: Objection.

23 A. No. I didn't have to worry about that.

24 Q. Do you know its purpose, what its purpose was?

1 A. No.

2 Q. Do you know whether Metro-Atlantic ever had any  
3 business relationships or dealings with Eli Lilly?

4 MR. FERROLI: Objection. No  
5 foundation.

6 A. The name sounds familiar. All I was doing  
7 was what I was doing.

8 MR. FITCH: That's all any of us can  
9 do. Thank you, Mrs. Knott.

10 THE WITNESS: It was a nice company  
11 to work for.

12 EXAMINATION BY MS. VAUDO

13 Q. Hi, Mrs. Knott, my name is Eve Vaudo. Earlier  
14 this morning you talked about how the kettles in  
15 the plant were cleaned?

16 A. Uh-huh.

17 Q. How did the -- did you know how to clean the  
18 kettles?

19 A. That wasn't my job. The men in the plant did  
20 that.

21 Q. Do you know how employees in the plant learned how  
22 to clean those kettles?

23 A. If they could clean them and use the stuff  
24 over again, they did.

1 Q. Do you know how they knew to try and reuse as much  
2 as they could?

3 A. That was their job to know that. All I did  
4 was do my work upstairs. I went downstairs  
5 because they were short of people, and it was  
6 easier for me to go down there. So I would go  
7 down and get what I wanted and do my thing and let  
8 them do their thing.

9 Q. Okay. Thank you. In Exhibit 4, which is the  
10 handwritten affidavit, the third page, Number 5,  
11 it says there the company made hexachlorophene?

12 A. Hexachlorophene. Yes, they did that, they  
13 had some of that.

14 Q. Do you know where in the plant they made that?

15 THE WITNESS: Do I know where it was  
16 in the plant made?

17 MS. VAUDO: Yes.

18 A. No, I don't.

19 Q. Do you know --

20 A. I know it stunk.

21 Q. Do you know the time period when that was made in  
22 the plant?

23 A. I think they used to try to make that so that  
24 it would be going out at night because it stunk.

1           Used to stink the town out.

2    Q.    Do you recall what it smelled like?  Can you  
3           describe that smell?

4           A.    Terrible, I know that.  It used to make like  
5           a kind of white stuff go around in the town, so  
6           that it kind of made -- when you were driving  
7           down, it was kind of dim, you know.  So they made  
8           it at night when it wouldn't make any difference,  
9           it was dark anyway.  What are they picking on  
10          Metro-Atlantic for?

11                   MS. VAUDO: We're just trying to get  
12           some information.  We're not trying to pick on  
13           anyone.

14    Q.    Do you remember the names of any of the employees  
15           who would have worked making the hexachlorophene?

16           A.    I can't remember any of the names.  It's been  
17           a long time.

18    Q.    Do you remember -- do you know if the company ever  
19           made any pesticides?

20                   THE WITNESS: Pesticides?

21    Q.    Could be known as a weed killer?

22           A.    No.  No.  It's been a long time since I  
23           worked there.

24                   MS. VAUDO: Thank you very much.

1 EXAMINATION BY MR. PELOSO

2 Q. Hi, Mrs. Knott, my name is John Peloso, I  
3 shouldn't have too many questions for you. You  
4 mentioned this morning that Joseph Buonanno and I  
5 think you mentioned Bernard Buonanno. I just want  
6 to ask you, were either of those people the person  
7 who oversaw production of chemicals at the plant?

8 A. They were pretty careful what was going on in  
9 their business. They walked around and watched.  
10 They had people that did it for them, but they  
11 would also watch them. They were fussy.

12 Q. Was there a person who was the hands-on person who  
13 actually did the overseeing?

14 A. There was people working in there that were  
15 supposed to be overseeing, but they used to come  
16 in and watch to make sure they were doing it  
17 right, too. So, in other words, it was done  
18 twice.

19 Q. You said there were people, do you recall the  
20 names of any of those people?

21 A. No, I don't remember them.

22 Q. Okay. Do you know what 2,4,5-TCP is?

23 A. No, I don't remember. I remember hearing it,  
24 but I don't remember what it was for.

1 Q. Do you know what 2,4,5-trichlorophenol is?

2 A. No. I don't remember any of these things.

3 Q. Do you have any recollection whether the company  
4 ever made either of those two names I just  
5 mentioned?

6 A. See, I was just doing -- what came up from  
7 downstairs, it came upstairs. Then it was getting  
8 to be too much of a pest, so I went downstairs and  
9 I just did what I was supposed to do. What was  
10 going on, I couldn't remember all those things.  
11 That's something that the other boys did.

12 Q. Do you recall at the time that you were worked at  
13 the plant ever meeting anyone who worked for Eli  
14 Lilly?

15 THE WITNESS: For who?

16 MR. PELOSO: Eli Lilly.

17 THE WITNESS: D.I.?

18 MR. PELOSO: Eli Lilly.

19 A. The name sounds familiar, but I don't know  
20 anything about it. See, I was only doing the  
21 bottle work. I mean, making -- doing the work  
22 inside. What was going out and what was -- that  
23 was somebody else's thing. All I had to do was  
24 make sure that it was made right.

1 Q. You said there were different vats -- there were a  
2 number of vats, a number of kettles and so forth.  
3 Is it fair to say that the company made more than  
4 one type of chemical?

5 A. Oh, yeah. They made quite a few.

6 Q. Would they make more than one type of chemical at  
7 the same time?

8 A. Oh, yeah.

9 Q. What is your best recollection of the greatest  
10 number of chemicals they would be making at one  
11 time?

12 A. Oh, I don't think they made more than three  
13 at a time, and they were just simple ones, the  
14 easy ones. If it was something that was really  
15 difficult, they did that at night when I wasn't  
16 there. So I don't know what they did. All I had  
17 to do is correct it -- check it in the morning.

18 Q. Do you recall what you said -- what the simple  
19 ones were?

20 A. No.

21 Q. Do you recall what the more difficult ones were?

22 A. I don't remember anything. It's a long time.

23 Q. Do you know what Agent Orange is?

24 THE WITNESS: What?

1 MR. PELOSO: Agent Orange.

2 A. No.

3 Q. So it's fair to say you don't recall whether the  
4 plant produced that or what that was?

5 A. No. Sometimes they had names on things that  
6 they sent out that I never knew what they were,  
7 anyway. Because they had a different -- they had  
8 a different name inside.

9 Q. I think you spoke a little bit this morning about  
10 hexachlorophene?

11 A. Yeah.

12 Q. What is your recollection -- what is your present  
13 recollection of what hexachlorophene is used for?

14 A. I don't know -- see, I didn't know what they  
15 were used for. I just knew -- I only did what I  
16 had to do. That was stuff was down in the plant.  
17 I just -- I went down there for a while and worked  
18 down there because it was too much trouble to go  
19 back and forth.

20 Q. Do you know who, if anyone, purchased  
21 hexachlorophene from Metro?

22 A. No. That wasn't one of my jobs either.

23 Q. Do you know whether -- was hexachlorophene a  
24 finished product made by the company, or was it

1 something that they used to make other products or  
2 both? I'll ask that as two questions if it's  
3 confusing.

4 A. Jeez, I don't know. I don't remember. It's  
5 been a long time since I've been there.

6 MR. PELOSO: I appreciate that.

7 THE WITNESS: About 12, 14 (sic)  
8 years now.

9 Q. Now, I think you spoke this morning about when you  
10 worked at the plant you took samples and you would  
11 test the samples. Do you recall, and can you  
12 maybe elaborate on anything else you did at the  
13 plant just on a daily basis?

14 A. No. That was all I had to do was just check  
15 them out to equal what they said it was supposed  
16 to be. When I did my work, if it equaled the  
17 same, it was all right. I used to take my own  
18 samples out of the things.

19 MR. PELOSO: I'm all finished.

20 Thank you very much, Mrs. Knott.

21 EXAMINATION BY MR. FERROLI

22 Q. I'm John Ferroli, I just have a few questions for  
23 you. It wasn't part of your job to deal with the  
24 customers of Metro-Atlantic, was it?

1 A. No.

2 Q. So you never dealt with any customers of  
3 Metro-Atlantic, is that true?

4 A. That's true.

5 Q. And it wasn't part of your job to mix chemicals,  
6 was it?

7 THE WITNESS: To miss them?

8 MR. FERROLI: Mix them.

9 A. No.

10 Q. You didn't work with chemicals at all other than  
11 to take samples; is that right?

12 A. Take samples and check them according to what  
13 they wanted. If it wasn't right, it wasn't, you  
14 know, the right thing -- right -- it was too low  
15 or too high or something, I told them, and then if  
16 it was too high, they could bring it down, but if  
17 it was too low, they had to use some of that up in  
18 the others.

19 Q. But someone else did the work with the chemicals  
20 in the vats?

21 A. Yes. I would just tell them how low it was  
22 or how high it was. I went downstairs to work for  
23 a while there because it was too much trouble for  
24 them to run up to me upstairs and for me to run

1 down stairs, so I said the hell with it, I'll go  
2 downstairs.

3 Q. And so it wasn't -- it wasn't part of your job to  
4 work with the shipping of these chemicals out to  
5 customers?

6 A. I had nothing to do with that.

7 Q. So you -- and you didn't work with the billing to  
8 customers at all, is that true?

9 A. No. All I did was make sure that it was in  
10 the right -- I did the chemical part, make sure  
11 that it was within reason. If it wasn't, I told  
12 them and they would take some of that and put in  
13 in the others to bring it up or down, but that's  
14 all I did.

15 Q. So you really had nothing to do with the customers  
16 of Metro-Atlantic?

17 A. Nothing.

18 Q. Is that right?

19 A. I don't even know who they were.

20 Q. None of them, right, you don't know who any of  
21 them were?

22 A. Nope.

23 Q. You can't remember any; is that right?

24 A. I never had any reason to even know who they

1           were.

2    Q.    Now, other than hexachlorophene, do you remember  
3           the names of any chemicals that Metro-Atlantic  
4           manufactured sitting here today?

5           A.    Not now I don't, no.

6    Q.    You remember hexachlorophene?

7           A.    Yes.

8    Q.    Do you remember any others besides that?

9           A.    No.  If I saw a list of chemicals, I'd  
10          probably be able to pick them out, but to remember  
11          them myself -- in other words, if somebody brought  
12          me a paper, I would say, oh, we made that or we  
13          made that.  I would probably remember it that way.  
14          But for me to remember it myself, no.  I'd have to  
15          see the book.

16   Q.    Do you remember any specific place where chemicals  
17          from Metro-Atlantic were shipped to, sitting here  
18          today?

19          A.    A lot of them went down south.

20   Q.    Do you remember any specific place?

21          A.    No, but I know they went down.  See, I didn't  
22          have anything to do with that, that was the other  
23          people.  I just made sure that they were within  
24          the right -- that's what I was doing, within the

1 right -- I did the testing.

2 Q. But in terms of who the customers were down south,  
3 you don't know who they were, correct? Is that  
4 right?

5 A. I don't know any of the customers. I didn't  
6 have anything to do with that.

7 Q. Now you worked for some time for Metro-Atlantic,  
8 you're not getting a pension from Metro-Atlantic  
9 are you?

10 A. No.

11 MR. FERROLI: That's all I have.

12 MS. CARNEY: I don't have anything.

13 MR. SHERMAN; I think we're done.

14 Thank you very much. I assume you want her to  
15 review and sign it?

16 MR. AUKERMAN: I would prefer that  
17 she review it and sign it.

18 MR. SHERMAN: We'd like her to do  
19 that.

20 (OFF THE RECORD DISCUSSION)

21 MR. SHERMAN: Send the original here,  
22 mini and electronic.

23 MR. BENIK: Copy and mini.

24 MR. FITCH: Regular and Minuscript

1           and ASCII.

2                           MR. PELOSO: I'll take a disk and  
3           regular.

4                           MS. VAUDO: Copy for me.

5                           MR. O'CONNOR: Mini.

6                           MR. RICCI: Disk and Minuscript.

7                           MR. FERROLI: Mini and electronic.

8                           MS. CARNEY: Mini.

9                           (DEPOSITION CLOSED AT 12:00 NOON)

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C-E-R-T-I-F-I-C-A-T-E

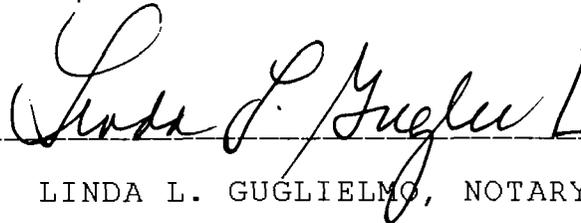
1  
2 I, LINDA L. GUGLIELMO, a Notary Public in and for  
3 the State of Rhode Island, duly commissioned and  
4 qualified to administer oaths, do hereby certify  
5 that the foregoing deposition of CHARLOTTE KNOTT, a  
6 Witness in the above-entitled cause, was taken  
7 before me on behalf of CNA, et al., at the offices  
8 of Edwards & Angell, LLP, One Financial Plaza,  
9 Providence, Rhode Island, on February 11, 2004, at  
10 10:00 A.M., that previous to examination of said  
11 witness, who was of lawful age, she was first sworn  
12 by me and duly cautioned and sworn to testify the  
13 truth, the whole truth, and nothing but the truth,  
14 and that she thereupon testified as in the  
15 foregoing manner as set out in the aforesaid  
16 transcript.

17 I further certify that the foregoing deposition was  
18 taken down by me in machine shorthand and was later  
19 transcribed by computer and that the foregoing  
20 deposition is a true and accurate record of the  
21 testimony of said witness.

22 Pursuant to Rule 5 (d) and 30 (f) of the Federal  
23 Rules of Civil Procedure, original transcripts  
24 shall not be filed in court; therefore, the  
original is delivered and retained by Mr. Richard  
Sherman.

I have enclosed with the original a correction and  
signature page, which must be signed before a  
Notary Public.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 17<sup>th</sup> DAY OF FEBRUARY, 2004.



LINDA L. GUGLIELMO, NOTARY PUBLIC/RPR-RMR

(MY COMMISSION EXPIRES AUGUST 13, 2005)

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Issued by the  
**UNITED STATES DISTRICT COURT**

FOR THE

DISTRICT OF

RHODE ISLAND

IN THE MATTER OF  
CENTREDALE MANOR SUPERFUND SITE  
The Petition of  
American Mineral Spirits Company, et al  
to perpetuate the testimony of Charlotte E. Knott

**SUBPOENA IN A CIVIL CASE**

V.

CASE NUMBER<sup>1</sup> MISC 03-114L

TO: Charlotte E. Knott, c/o James V. Aukerman, Esq., James V. Aukerman & Associates, LLC,  
60 South County Commons Way, Wakefield, RI 02879

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Edwards & Angell, LLP, 28th Floor, 2800 Financial Plaza, Providence, RI 02903	Feb. 11, 2004 at 10:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME

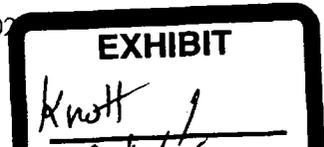
YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
<i>Richard A. Sherman</i>	January 21, 2004

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER  
Richard A. Sherman, Esq. (# 1190), Edwards & Angell, LLP, 2800 Financial Plaza, Providence, RI 02903



**PROOF OF SERVICE**

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Due and lawful service on Charlotte E. Knott is hereby acknowledged.

Executed on January 22, 2004  
DATE

James V. Aukerman  
SIGNATURE OF SERVER  
James V. Aukerman  
James V. Aukerman & Associates, LLC  
ADDRESS OF SERVER  
60 South County Commons Way  
Wakefield, RI 02879

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in

person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

FILED

JAN 15 2004

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

IN THE MATTER OF

CENTREDALE MANOR SUPERFUND SITE

M.P. No. 03 114L  
CIVIL ACTION NO.

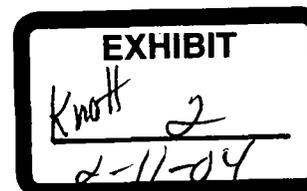
NOTICE OF DEPOSITION

TAKE NOTICE that the Petitioners, American Mineral Spirits Company; CNA Holdings, Inc.; Ciba Specialty Chemicals, Inc.; Cranston Print Works Company; Sequa Corp.; Teknor Apex Co.; and The Original Bradford Soap Works, Inc. ("Petitioners"), by and through counsel, will take the deposition of Charlotte E. Knott on February 11, 2004, beginning at 10:00 a.m., upon oral examination before a Registered Professional Court Reporter at the office of Richard Sherman, Edwards & Angell, LLP, 2800 Financial Plaza, Providence, Rhode Island 02903.

If said deposition be not commenced on the said date, time and place or be commenced and not concluded, the same will be continued from day to day at the same time and place until concluded.

AMERICAN MINERAL SPIRITS COMPANY

By Richard A. Sherman  
Richard Sherman  
Edwards & Angell, LLP  
2800 Financial Plaza  
Providence, RI 02903  
401/276-6513



CNA HOLDINGS, INC.

By David B. Graham

David B. Graham  
Kaufman & Canoles, PC  
4801 Courthouse Street, Suite 300  
Williamsburg, VA 23188  
401/259-3855

To: All anticipated adverse parties named in the Petition and  
to all counsel on the attached Service List

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of January 2004, a true copy of the foregoing was  
mailed to all counsel on the attached Service List.

David B. Graham

CENTREDALE MANOR SITE SERVICE LIST

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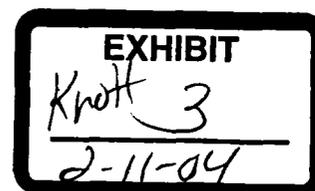
#6049898 v1 - Centredale Manor Site Service List

Superfund Records Cent:  
SITE: Woonasquatucket  
BREAK:             
OTHER: 44195

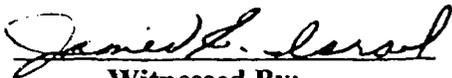
**STATEMENT**

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

Affidavit

Superfund Records Center  
SITE: Centerville  
BREAK: 10-4  
OTHER: 25909

I, Charlotte Knott, do hereby state and depose

1. I was employed by Atlantic Chemical and MTA-Atlantic as the Supervisor of Quality Control, from approximately 1945 until 1959. My job included taking samples from the kettles, where the product was being made. The company made chemicals that were used mainly by the textile industry, including a large amount of waterproofing materials. Caustic, formaldehyde, and other chemicals whose names I cannot recall were used in the production process. These materials were mixed in large kettles, of which there were at least 10 in the plant. Samples of the materials being made in the kettles were taken to the lab and tested as a part of Quality Control. They were tested to ensure that the product met the specifications required of it.

2. Waste material from the kettles was drained into the river. After the product had been made and emptied from the kettles, the kettles had to be cleaned before they would be reused. The kettles were cleaned by washing them with water from hoses. When they

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EXHIBIT

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were clean, the waste water and the residue in the kettle was drained into the river by opening some valves, that allowed the water and waste in the kettle to drain into pipes, which emptied into the river. The disposal of waste into the Woonasquet River occurred on a daily basis, each time one of the 10 or more kettles were cleaned. Bad batches of material, that could not be saved, were also drained from the kettles into the Woonasquet River.

3. I have seen animals in the river die, when they came into contact with the chemical waste, that had been discharged from the plant into the river. On one occasion, a 55 gallon drum with a chemical in it spilled onto the floor of the plant. The workers had to cover their faces with towels dipped in water and exit the building. When the material was drained into the river, the fish in the river turned "belly up" and died. The gas from the chemical got into the refrigeration unit of the first National Supermarket near the plant and contaminated all of the meat, which then had to be discarded. This gas or vapor also melted the

ceak

windshield wipers on automobiles driving by the plant.

4. Barrels, that had contained chemicals used in the production process, were rinsed with water and reused. This waste water was also drained into the river.

5. The company made hexachlorophene, but I cannot recall the name of the customer for whom it was made.

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 10<sup>th</sup> day of May, 2001.

Monty F. Baker Jr.  
Witnessed by

Charlotte E. Knott  
Charlotte E. Knott