

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 - NEW ENGLAND

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

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

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1 APPEARANCES
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3 FOR EPA:
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5 U.S. ENVIRONMENTAL PROTECTION AGENCY
6 BY: CATHERINE GARYPIE, ESQUIRE
7 ONE CONGRESS STREET, SUITE 1100 (SES)
8 BOSTON, MA 02114-2023
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1 NOVEMBER 30, 1999, 6:00 P.M.
2 [REDACTED]
3 called as a witness and having been first duly
4 sworn, testified as follows:
5 EXAMINATION
6 BY MS. GARYPIE:
7 Q. I'm going to give a bit of an introduction
8 for the record and, then, I'll give you some
9 instructions and, then, I'll be asking you
10 questions.
11 My name is Catherine Garypie. I'm an
12 attorney with the United States Environmental
13 Protection Agency. I represent the United States.
14 This administrative deposition is being taken
15 for information-gathering purposes, not for
16 adjudicatory purposes, pursuant to Section
17 122(e)(3)(B) of the Comprehensive Environmental,
18 Response, Compensation, and Liability Act of 1980,
19 also known as Superfund.
20 The information I'll be asking for today
21 relates to the volume and toxicity of wastes at
22 the Site, potentially responsible parties at the
23 Site, and the ability of potentially responsible
24 parties to pay for or perform response actions at
25 the Site. And for your information, under the

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1 Superfund law, there are four broad categories of
 2 potentially responsible parties.
 3 1. Persons who arrange for disposal or
 4 transport of hazardous substances to a Site, also
 5 known as generators.
 6 2. Transporters who selected the Site for
 7 the disposal of hazardous substances.
 8 3. Past owners and operators of the Site who
 9 owned and operated at the time of the release or
 10 who transferred ownership without disclosing
 11 knowledge of the release.
 12 4. Former owners and operators.
 13 Just a couple of things. If you need to take
 14 a break, just let me know. If you answer a
 15 question with a nod, I'll ask you whether that's a
 16 "yes" or a "no".
 17 A. Okay. All right.
 18 Q. And if you -- if I ask you the size of
 19 something and you motion with your hands, I'll ask
 20 you to describe it.
 21 A. Yep.
 22 Q. And, finally, I'll ask you to wait until I
 23 finish asking the question before you answer, even
 24 if you think you know what I'm going to ask just
 25 so the court reporter can get everything down.

1 A. Okey-dokey.
 2 Q. You've already stated your name. What is
 3 your address?
 4 A. [REDACTED] Street,
 5 North Providence, Rhode Island.
 6 Q. And what's your date of birth?
 7 A. February 9th, 1951.
 8 Q. And what's the highest level of education
 9 you've completed?
 10 A. High school.
 11 Q. And have you served in the military?
 12 A. Oh, yeah.
 13 Q. And what branch of the military?
 14 A. Navy during the Vietnam War.
 15 Q. How many years were you in the Navy?
 16 A. Oh, about three years.
 17 Q. And were you honorably discharged?
 18 A. Absolutely.
 19 Q. And where are you currently employed?
 20 A. Apex Tire in Pawtucket.
 21 Q. How long have you been there?
 22 A. Twenty-five years.
 23 Q. What are your job duties there?
 24 A. I'm an automobile technician.
 25 Q. And what does that entail?

1 A. I'm a mechanic. I repair cars.
 2 Q. Did you prepare for this administrative
 3 deposition or sworn statement?
 4 A. Prepared for it? I live around here.
 5 I've seen what's going on. I don't have to
 6 prepare for it.
 7 Q. But have you spoken with anybody in
 8 anticipation of coming here tonight?
 9 A. No.
 10 Q. Have you -- how long have you lived at your
 11 current address?
 12 A. Except for the Vietnam War I've been
 13 there since 1951. I was born there.
 14 Q. In the house?
 15 A. No, no, not in the house but I was
 16 raised there since I was tiny.
 17 Q. Got you. How far is that from the site?
 18 A. It's about a third of a mile.
 19 MS. GARYPIE: I'm going to hand you what
 20 is going to be marked Exhibit 1.
 21 (Whereupon, Asselin Exhibit No. 1 was
 22 marked.)
 23 Q. And I'm going to ask you to take a look at
 24 this and let me know when you're done.
 25 A. Allendale Pond. Yeah. It's a map of

1 the area.
 2 Q. Okay. I'm going to hand you a pen and ask
 3 you to mark with an "X" where you live.
 4 A. Right here.
 5 Q. Thank you. When you were younger, did you
 6 have occasion to visit the site?
 7 A. All the time.
 8 Q. And approximately how old were you when you
 9 visited the site?
 10 A. I was between the ages of 10 years old
 11 and about 15 and 16 years old.
 12 Q. And how did you get to the site?
 13 A. Came in by boat, rowboat, raft, canoe,
 14 whatever floated.
 15 Q. And what was the purpose of visiting the
 16 site?
 17 A. Scavenging for building materials for
 18 tree houses and whatever.
 19 Q. And just so -- I want to check my dates
 20 here -- so that was between 1961 and --
 21 A. And I would say 1960 to 1965, 1966.
 22 There used to be a whole gang of us that went out
 23 on the river. It was like three or four of us
 24 that -- kids that lived in the neighborhood and
 25 we'd just row all over the place out there and,

1 obviously, this is one of the spots that we went
 2 to.
 3 Q. What are the names of other kids?
 4 A. One of them is dead in an industrial
 5 accident, a kid named Pat Smith, and there was a
 6 kid named Terry. I don't remember his last name.
 7 That's about it.
 8 Q. How many of you would visit the site at a
 9 time?
 10 A. Oh, we would all be out in the boat
 11 fishing and hunting, you know, what kids do in
 12 their -- in their early years rummaging around the
 13 woods and exploring the neighborhood and we rowed
 14 our way into the back right over here.
 15 Q. When you say, "over here," what part of the
 16 site are you referring to?
 17 A. The rear section where the -- where the
 18 dump was, the dump site.
 19 Q. And is that the end that's closer to
 20 Allendale Pond or closer to Route 44?
 21 A. It's -- it's right in the swamp of
 22 Allendale Pond in the rear section.
 23 Q. And when you rode in, you mentioned that
 24 there was a dump there?
 25 A. Yes.

1 Q. Can you describe that a little bit more?
 2 A. It was -- it completely surrounded the
 3 end property, the whole end perimeter of this land
 4 behind us here. It was all filled with debris
 5 from the mill and the barrel-recycling place.
 6 Q. And when you say, "behind us," are you
 7 referring to the area south of what is now
 8 Centredale Manor?
 9 THE WITNESS: That's south, right?
 10 MS. GARYPIE: Correct.
 11 A. Yes. Yes.
 12 Q. What was in the dump?
 13 A. Debris from the mill, which consisted of
 14 skids; galvanized aluminum-type cans that used to
 15 contain chemicals; plastic barrel liners that were
 16 inside barrels that were taken out and thrown
 17 away. Some of them had chemicals still in them
 18 and stuff like that.
 19 Packaging, all kinds of packaging; plastic
 20 bags; just general debris from the industrial-type
 21 complex. Lots of spilled -- what do they call
 22 that stuff -- sludge, black oozing-type sludge
 23 that was dumped on top of the stuff and if it got
 24 on your shoes, it instantly ruined them.
 25 Q. How did it ruin your shoes?

1 A. Well, you couldn't get it off. It was
 2 like tar. I didn't do a chemical analysis of it.
 3 I mean I just stepped in it and said, "Oh, shit."
 4 Q. Were any of the -- was there an odor
 5 associated with the dump?
 6 A. Oh, yeah, you could smell chemicals,
 7 strong. Really, you could pick up on odor all the
 8 time. All -- all the ground that this stuff was
 9 thrown on was actually, it was actually dumped
 10 into a swamp as backfill to make the place bigger.
 11 In other words, they were using the trash as
 12 a landfill and, then, they'd just dump dirt on top
 13 of it and keep expanding the back -- the back of
 14 the area to make it bigger.
 15 Q. So would it be filled to -- in order to fill
 16 in the land moving south?
 17 A. Right. Right. It was -- it was -- it
 18 served two purposes. It would -- they would get
 19 rid of their trash and they were using it to
 20 expand the area just little by little, it got
 21 bigger and bigger, and there were chemicals -- all
 22 kinds of chemicals spilled all over the ground,
 23 just barrels dumped right over. Any -- any of the
 24 contents that were in the barrels that were
 25 useless, they'd just tip them upside down in the

1 swamp and, then, you know, recycle the barrel.
 2 Q. Okay. When you were in the dump area, were
 3 there different color chemicals or was it all the
 4 black tar?
 5 A. No. It was -- it was powdery
 6 substances. Purple.
 7 Q. What color powder?
 8 A. Purple color, greens. You name it, the
 9 rainbow colors. It was all kinds of different
 10 stuff left in bags and, you know, just discarded
 11 extra materials that they didn't need.
 12 Q. Were any of the containers labeled?
 13 A. Yeah. DuPont was written on most of
 14 them. There was a lot of DuPont name brands,
 15 stuff like that. I don't remember the other ones
 16 but I remember the DuPont because there seemed to
 17 be a lot of it.
 18 Q. Was there -- did you ever see anything with
 19 the name Metro-Atlantic on it?
 20 A. That's a very good possibility. Let me
 21 think. I probably did but I can't remember. I
 22 remember DuPont though. That -- that stuck out in
 23 my mind because that was stamped on the aluminum
 24 galvanized barrels that they threw away.
 25 Q. And when you say, "barrels," what sizes are

1 you talking about?
 2 A. 25-gallon, 30-gallon.
 3 Q. Do you recall if there were mailing labels on
 4 any of these containers?
 5 A. There probably was but we didn't pay
 6 attention to it. If you dug it out, you'd
 7 probably find them.
 8 Q. You mean if we dug it now?
 9 A. Right. Right.
 10 Q. Did you ever have any kind of skin reaction
 11 to any of the chemicals you encountered in the
 12 dump?
 13 A. Well, I opened up a 50-gallon drum once
 14 just to see what was inside of it and the -- the
 15 vapors were so intense, it almost rendered me
 16 unconscious, so that was that. I mean it took my
 17 breath away and literally sent me reeling
 18 backwards like, whoa, God, (witness coughing),
 19 let's get the hell out of here.
 20 Q. Did you ever get any rashes?
 21 A. I don't remember. We are talking -- we
 22 are talking 35 years ago. I -- I don't remember
 23 anything big time. I may have. I mean I just
 24 don't remember.
 25 Q. Do you remember getting any chemical burns in

1 the dump area?
 2 A. Shoes.
 3 Q. The shoes would burn?
 4 A. The shoes were eaten up from walking
 5 around. We knew enough not to touch anything with
 6 our hands except what we were, you know, looking
 7 for, like lumber and stuff that wasn't heavily
 8 contaminated.
 9 Q. And as you moved further north at the site,
 10 what was there?
 11 A. Thousands and thousands of barrels
 12 stacked in pyramids like this. This would be the
 13 ground level. They would be peaked like that.
 14 Q. So you're forming a triangle with your hands?
 15 A. Like a triangle, yeah. There would be
 16 50, 60, maybe a hundred drums in one pile and they
 17 would all be neatly stacked like that and there
 18 would be row after row of them.
 19 Q. Were there any names on these drums?
 20 A. There were various different colors and
 21 various different conditions. Some of them were
 22 rusty; some of them were painted black; some of
 23 them were painted gray. We really didn't examine
 24 them, you know. We weren't looking for names,
 25 anything like that.

1 Q. What colors do you remember seeing?
 2 A. Mainly black, rust; solid rust was a
 3 favorite; black. There would be -- there would be
 4 some green, dark green colors with stripes on
 5 them.
 6 Q. What color stripes?
 7 A. White. They had white -- some of them
 8 had white stripes. There was some galvanized
 9 drums that were just galvanized color. You know
 10 what I mean by "galvanized metal"? It's not
 11 painted.
 12 Q. Is that a silver color?
 13 A. Almost, yeah, like a -- like a gray
 14 color.
 15 Q. Okay.
 16 A. And right where this trailer is, there
 17 would be stacks right here along the edge of the
 18 embankment.
 19 Q. And you're referring to the EPA trailer
 20 that's adjacent to the Woonasquatucket?
 21 A. Right here. There would be hundreds of
 22 barrels stacked right here and when the river
 23 would flood, like in a rain storm of like two or
 24 three days, we'd get six or seven inches of rain,
 25 the water would come -- come flying down here and

1 it would wash away the barrels that were closest
 2 to the embankment and, of course, they were empty,
 3 so they floated and they just got, you know, all
 4 scattered all over the place downstream.
 5 Q. Were the drums that were piled, did they
 6 contain any kind of material?
 7 A. Most of them were empty because it was a
 8 recycling plant.
 9 Q. Were all of them empty?
 10 A. No, not all of them but I would say the
 11 majority of them were.
 12 Q. And where was the recycling plant in relation
 13 to the piles of drums?
 14 A. You're sitting right in the middle of
 15 it. Right, right here. I think there was a
 16 building farther up this way.
 17 Q. And when you say, "farther up this way," you
 18 mean --
 19 A. Towards -- towards Route 44.
 20 Q. -- you mean north of the EPA trailer?
 21 A. Right. Right. And I think what they
 22 had was a sandblaster or a furnace or something
 23 that they would stick the drums in and they'd
 24 burn -- burn the residue out of them and they'd
 25 burn the paint out of them and, then, sandblast

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

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

6 A. Oh, yeah.

7 Q. How did the operation work?

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

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

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

25 So if they took the barrels, they got the

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

9 Q. In the dump area?

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

12 Q. What would happen?

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

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

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

24 A. Yeah. Metro-Atlantic Chemical.

25 Q. And did you observe those operations?

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

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

8 A. Right.

9 Q. -- out of the drums --

10 A. Right.

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

13 A. Yeah. Yeah.

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

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

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

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

22 Q. Anything like that?

23 A. No. No.

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

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

7 Q. When you say their trucks --

8 A. Metro-Atlantic.

9 Q. Okay.

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

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

16 A. Both places, right.

17 Q. -- both companies?

18 A. Both companies.

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

22 A. Yeah.

23 Q. -- employees?

24 A. Yeah.

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

1 recycling?
 2 A. They were hanging around down this end
 3 of the lot. That's where they were working. I
 4 mean I didn't, you know -- other than seeing it on
 5 one of their jackets that said the company name on
 6 it, but you see these guys every day and they are
 7 working in the same area, so I would assume that
 8 that's where they are from.
 9 Q. So when you say, "the same area," do you mean
 10 they were working both in the furnace area as well
 11 as back by the dump and, then, the piles?
 12 A. Exactly. Right.
 13 Q. Did the Metro-Atlantic workers have different
 14 clothing than the drum recycling?
 15 A. They had mostly civilian-type clothes,
 16 work clothes, you know, checkered, checkered
 17 shirts and stuff like that. It wasn't like a
 18 military operation. I mean people dressed kind of
 19 sloppy. No specific dress code.
 20 Q. And was that true for both companies?
 21 A. Pretty much, yeah. Every now and then,
 22 you'd see somebody in a jacket with a name on it.
 23 Q. So the way you were able to distinguish who
 24 was working for what company was based on the area
 25 in which --

1 Metro-Atlantic operated and draw a "1" next to it.
 2 A. Well, this -- this area right here.
 3 Q. Okay. Just draw a big circle around it.
 4 A. (Witness complying.)
 5 Q. And put a "1" next to it.
 6 A. (Witness complying.)
 7 Q. And if you could draw a circle around where
 8 the barrel company was and put a "2" next to that.
 9 A. Okay. A "2" right in the middle of it.
 10 Q. Perfect.
 11 A. Some of this stuff is labeled, huh?
 12 What does that say? Okay. That's -- that's the
 13 building where I think the barrels were
 14 sandblasted or -- or furnaced right here.
 15 Q. And you're -- just let the record reflect
 16 you're referring to the second building from the
 17 southernmost -- in other words, it's the building
 18 that says, "Steel drum reconditioning"?
 19 A. Yeah. Yeah. That's it. And there's
 20 another one here too. There's another building of
 21 some kind, barrel cleaning. Okay?
 22 Q. And does that accurately depict the
 23 operations --
 24 A. Yeah.
 25 Q. -- in approximately --

1 A. Right.
 2 Q. -- they worked?
 3 A. Right. Right. Because this property
 4 was split in half. Metro-Atlantic was up there
 5 and the barrel recycling plant was down this end.
 6 Q. So when you say, "up there," you're referring
 7 to --
 8 A. Towards 44.
 9 Q. Okay.
 10 A. Right.
 11 MS. GARYPIE: I'm going to mark
 12 Exhibit 2.
 13 (Whereupon, [redacted] Exhibit No. 2 was
 14 marked.)
 15 Q. And I'm going to ask you to take a look at
 16 this for a minute or two and let me know when
 17 you're done.
 18 A. Let's see -- which way is -- that's --
 19 that's Smith Street. That's Waterman Avenue.
 20 Where are we on this? Where is the river? Oh,
 21 here's the river. Okay. All right. All right.
 22 This is Metro in here. In this area here would be
 23 the barrel recycling area.
 24 Q. Okay. I'm going to hand you a pen and I'm
 25 going to ask you to circle the area where

1 A. That's exactly what was here.
 2 Q. -- in 1965?
 3 A. Around that area. This says '67 but I
 4 don't think it changed much between 1960 and 1967.
 5 It was basically the same. This building here
 6 says, "Chemical manufacturing."
 7 Q. And is that the building right next to the
 8 Woonasquatucket River?
 9 A. Yeah. Yes.
 10 Q. What can you tell me about that building?
 11 A. Not a hell of a lot. They had a couple
 12 of pipes that I think extended out towards the
 13 river, like discharge pipes. I'm pretty damn sure
 14 there were pipes coming out of that and farther
 15 upstream, there may have been some pipes coming
 16 out some of the buildings that were along the
 17 side.
 18 Q. Do you recall seeing materials discharged
 19 from those pipes?
 20 A. Yeah. Occasionally I'd see something.
 21 We usually didn't row up this far because you're
 22 fighting the current. The current is pretty
 23 strong right there and it's a real problem to
 24 out-row the current, so it was very rare, very
 25 rarely that we made up in this area but, on

1 occasion, we did see them discharging crap and
 2 there would be steam coming from the building, the
 3 vents and the -- the --
 4 Q. When you say, "the building," which building?
 5 A. This one right here.
 6 Q. The small one next to the river?
 7 A. Right. Anything along this area here
 8 might have had steam coming out of it somehow. I
 9 don't know what they were doing but, you know --
 10 of course, if we went in there, they'd chase us
 11 out of there, so we couldn't get a real good
 12 inside look of the buildings but it was some kind
 13 of manufacturing or whatever.
 14 Q. And what color was the material that was
 15 coming out of the pipes?
 16 A. I don't remember a color. Could have
 17 been clear; some kind of clear stuff would be
 18 coming out of it.
 19 Q. Do you recall anything else about what was
 20 coming out of the pipe, any other characteristics?
 21 A. Hum --
 22 Q. Odor or --
 23 A. No. We stayed away from them. If there
 24 was something coming out of it, we didn't want any
 25 part of it.

1 Q. Other than the disposal by the chemical
 2 company and the dump and the spills you described
 3 by the -- in the dump and near the drum piles,
 4 were there other spills that you observed at the
 5 site?
 6 A. They had a formaldehyde tank explode.
 7 Q. Do you know where that tank was located?
 8 A. That I couldn't tell you exactly where
 9 but I imagine it was up near Metro-Atlantic. I
 10 think it was their formaldehyde tank and it was
 11 probably pretty big because it sprayed
 12 formaldehyde all over my house, all over the
 13 neighborhood and I'm a third of a mile away from
 14 them.
 15 Q. How do you know it was formaldehyde?
 16 A. Because it was in the paper. The tank
 17 blew up; it just ruptured like a pressure cooker.
 18 The top, the roof blew right off of it and the
 19 stuff shot up into the air probably three, four
 20 hundred feet in every direction. It blew apart.
 21 Q. Do you remember any other explosions or
 22 fires?
 23 A. I heard about them. There were -- I
 24 heard a couple of news reports about fires at
 25 the -- at the chemical mill, like a couple of

1 explosions here and there through the years. I
 2 didn't actually witness them.
 3 Q. Did you ever witness any drums in the dump
 4 area exploding?
 5 A. No, not while I was there. I didn't see
 6 anything explode. I wouldn't be here.
 7 Q. Do you recall any smoke or haze anywhere in
 8 the site?
 9 A. Yeah. You'd have -- you'd have fumes
 10 coming out of the ground that you could actually
 11 see how intense they were. You know like
 12 gasoline? Have you ever seen gasoline kind of,
 13 like, evaporating?
 14 Q. Yes.
 15 A. That's the kind of fumes you'd pick up
 16 sometimes if -- if you --
 17 Q. So you could see chemicals evaporating?
 18 A. Right. You could see chemicals
 19 evaporating on the ground and give you that -- how
 20 can I describe it -- like an illusion kind of
 21 thing when you're looking at an object and, all of
 22 a sudden, it gets hazy and, you know, it starts --
 23 how the hell can I say that?
 24 Q. It gets wavy?
 25 A. Yeah, like heat waves. Have you ever

1 seen heat reflect off the ground? Well, that's
 2 basically what you could see the chemical reaction
 3 doing in the dirt.
 4 Q. And was that just in the dump area or was it
 5 in other parts of the site?
 6 A. It was -- it was spread around this
 7 area. I mean they weren't very careful with what
 8 they did. I mean they, you know, you could go
 9 walking around --
 10 Q. And when you say, "they," are you referring
 11 to both companies?
 12 A. Well, basically right behind where the
 13 barrel place is and --
 14 Q. Okay.
 15 A. -- and, you know, they'd just tip
 16 something over and just dump the contents out on
 17 the ground and not even worry about it. I mean
 18 they'd actually be walking in this crap. I don't
 19 know what they had for boots but it was pretty
 20 nasty shit as far as I was concerned.
 21 Q. Did you ever see any workers injured as a
 22 result of contact with materials in the drums?
 23 A. I heard them complaining about the smell
 24 a lot, you know. They would be -- they would be
 25 coughing and gagging, you know, working with

1 these -- with this stuff in the back. They would
 2 be like (witness coughing). That's a nasty one
 3 you know, stuff like that.
 4 Q. And when you say, "they," do you mean the
 5 drum-recycling workers?
 6 A. Right. Right. I mean you could open
 7 these drums and it would just take your breath
 8 away. I'm a pretty tough person and I can -- I
 9 can handle chemicals to some extent, but I mean
 10 this stuff was so overpowering that it would blind
 11 you and take your breath away.
 12 Q. In your current work, do you work with
 13 solvents?
 14 A. Oh, yeah.
 15 Q. And did you recognize any of these odors as
 16 solvents?
 17 A. The stuff we work with is -- it won't
 18 harm your skin and it doesn't have a real, real
 19 toxic substance to it. It's -- it's not like this
 20 stuff. This stuff was nasty.
 21 Q. So it was a very different smell?
 22 A. Yeah. Yeah. We use a parts cleaning
 23 machine to wash automotive parts that get greasy
 24 and it's an OSHA-approved type chemical and you
 25 really can't smell it but the stuff they were

1 playing with was just brutal, nasty.
 2 Q. You mentioned -- you probably already told me
 3 this, so forgive me if I'm asking you the same
 4 question again, but when the drums came in and
 5 were placed in the piles, whose truck was bringing
 6 them in?
 7 A. They had a huge Ford. I think it was a
 8 Ford.
 9 Q. When you say, "they", do you mean --
 10 A. The barrel-recycling place.
 11 Q. Okay.
 12 A. They had a large flatbed truck with
 13 rails on it, so you could put drums in it, a lot
 14 of them. I mean you could stack these things like
 15 20 feet high. Okay?
 16 Q. When you say, "drums", what size drums?
 17 A. Fifty-five gallons. They could probably
 18 drag in 100 drums in one shot, one truckload.
 19 Q. Did the trucks say "New England Container" on
 20 them?
 21 A. Oh, yeah. Yeah.
 22 Q. Since you lived in the area, did you ever see
 23 this truck outside of the facility picking up
 24 drums anywhere?
 25 A. I've seen it -- I've seen it drive by on

1 the street but I never saw them picking up stuff
 2 wherever they went. I mean they could go
 3 anywhere.
 4 Q. And do you know the names of any of the drum
 5 company workers?
 6 A. No. The only time I met them, when then
 7 chased me into the river. We weren't on talking
 8 terms at the moment.
 9 Q. Do you know the names of any employees from
 10 the chemical company?
 11 A. Nope. I was only 12, 13 years old. I
 12 mean -- they didn't seem to have a lot of
 13 employees.
 14 Q. How many employees did the drum company have?
 15 A. I think they probably had about six,
 16 about six people that worked there. I'm not sure
 17 but I mean you only see two or three of them at a
 18 time. There wasn't like a whole army of them.
 19 Q. How many employees did Metro-Atlantic have?
 20 A. Oh, they probably had more. They
 21 probably had, like, 50, 60. I mean don't quote me
 22 on that but that's what I'm estimating as to how
 23 many people I would see around the mill.
 24 Q. What can you -- can you tell me about
 25 wildlife around the facility?

1 A. Or lack of it. That's more like it.
 2 Over on that side where the water is --
 3 Q. When you say, "that side," do you mean the
 4 east side of the site?
 5 A. Yeah. Well, that's south, north, east,
 6 west. Yeah, east side. The water was gray, ghost
 7 gray all the time, and there was this gray
 8 sediment that was attached to everything, all the
 9 leaves and branches.
 10 If you stuck your hand in the water, you
 11 couldn't see your fingers. I mean if I stuck my
 12 hand in that far, you could wiggle your fingers
 13 and you couldn't see them moving.
 14 Q. You mean if you stuck your hand in --
 15 A. Yeah, 6 inches, to try to move something
 16 in the water like a log that got in the way or
 17 something like that, if you stuck your hand like
 18 that, you couldn't see your fingers wiggling.
 19 That's how polluted it was.
 20 Q. Did the material in the water on the east
 21 side of the site affect the plants?
 22 A. Yeah. Yeah. It affected the plants; it
 23 affected everything.
 24 Q. How did it affect the plants.
 25 A. It would kill it along the embankment.

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1 It was a real tough grow for them over there.
 2 They had a hard time. I mean look at the toxic
 3 stuff that they dumped there.
 4 Q. Did you ever see any fish --
 5 A. None.
 6 Q. -- in that area?
 7 A. Zero. Nothing, nothing would live in
 8 that water because it was so bad.
 9 Q. Did you ever see turtles?
 10 A. Turtles? Rarely, very rarely. If they
 11 did go in there, they got right the hell out of
 12 there.
 13 Q. How about on the south end of the site in the
 14 dump area, what was the vegetation like there?
 15 A. Swamp. Swampy vegetation, you know.
 16 Cattails, skunk cabbage weed, river grass, you
 17 know, stuff like that.
 18 Q. Was there vegetation where the dumping was
 19 occurring?
 20 A. Yeah, yeah, there was.
 21 Q. Would the weeds grow up through the waste for
 22 instance?
 23 A. That dump is probably about 5 feet deep,
 24 so that they just kept -- they just pulled right
 25 up to the edge and dumped the crap off and it

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1 wasn't like it was a lot of stuff at once; it was
 2 over a long period of time that they did that, so,
 3 yeah, you could say that there was some stuff
 4 trying to grow up between it.
 5 Q. And did you see wildlife in that area?
 6 A. Not usually. I mean birds and snakes,
 7 every now and then you'd see stuff like that but I
 8 would say the wildlife tried to avoid it because
 9 of the smell.
 10 Q. And you mentioned just a minute ago that
 11 there was a buildup of waste disposed over time in
 12 the swamp. Was there much waste in the dump area
 13 when you first started visiting the site in 1960?
 14 A. I don't think it really changed much.
 15 It -- it -- it basically seemed it stayed the same
 16 as far as whatever they were throwing back there,
 17 it was -- it was usually the same kind of stuff.
 18 Q. So was there already material in the dump
 19 when you first started --
 20 A. Oh, yeah. That's what attracted us to
 21 the site. Like I said, we were looking for
 22 building materials for tree houses and forts and
 23 stuff like that and that was perfect; that was
 24 right there, so it was like a magnet; we were in
 25 it.

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1 Q. Was the water on the east side of the site
 2 moving at all?
 3 A. No. Very stagnant. Very stagnant.
 4 Q. And the water on the west side was fast
 5 moving?
 6 A. Ripping right through here just like it
 7 is right now.
 8 Q. Was there any effect on vegetation from the
 9 material that was coming out of the pipes?
 10 A. You could see -- you could see the --
 11 the -- this embankment on this side --
 12 Q. When you say, "this side," do you mean the
 13 east bank?
 14 A. Right. No. That's east; that's west.
 15 Q. Correct.
 16 A. We are talking the west bank now.
 17 Q. The west bank, the west side of the site --
 18 A. Right.
 19 Q. -- where the land meets the water?
 20 A. Right.
 21 Q. Okay.
 22 A. That side of it was -- was -- would be
 23 stained. It would have like a bathtub ring along
 24 the edge of the water and you could see it. If
 25 the water was high, you wouldn't notice it so

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1 much. If it dropped down like a drought, you
 2 could see the -- the -- the stains along the
 3 embankment from whatever was being dumped into the
 4 river.
 5 Q. What color was that stain?
 6 A. It was black looking. It was like a
 7 brownish-black. Sometimes it was like an a
 8 vomit-type rust color. Hard to describe. It was
 9 just, you know, ugh.
 10 Q. Did you ever explore north of Smith Street
 11 along the Woonasquatucket River?
 12 THE WITNESS: Past the beginning where
 13 Metro would be?
 14 MS. GARYPIE: Right.
 15 A. Up here? We went up a little bit.
 16 There's an old dam that used to be there right
 17 next to the Masonic Temple. There's the remains
 18 of an old dam. I don't know if you've seen it.
 19 Q. I haven't.
 20 A. Okay.
 21 Q. But go on.
 22 A. And that's about as far as we went up in
 23 that area.
 24 Q. The Masonic Temple?
 25 A. Right. Here's the river. Here's 44

1 cutting across it and we got up into this area
 2 right here and there's also some manufacturing
 3 metal plants up here where they make jewelry stuff
 4 or chrome plating or whatever.
 5 Q. Can you mark that area with a number "3"?
 6 A. Right here.
 7 Q. And when you were in that area, did you see
 8 any dumping occurring?
 9 A. There would be stuff thrown down the
 10 embankments but nothing, nothing like what was
 11 over here.
 12 Q. Was the vegetation -- strike that. Let me
 13 start over.
 14 Was there a ring, sort of a bathtub ring
 15 along the vegetation in Area 3?
 16 A. I can't recall and we didn't really
 17 spend a lot of time up in that area. You know, it
 18 was like once in a blue moon we made it up all the
 19 way to that part because of the -- the current was
 20 so brutal.
 21 Q. Let me get back to when you were -- sorry to
 22 jump around so much by the way.
 23 A. No problem.
 24 Q. Let me go back to where you were describing
 25 the dump area. You mentioned that there would be

1 dumping and, then, there would be filling with
 2 soil?
 3 A. Right. They'd just dump dirt on top of
 4 it and bury whatever they had dumped.
 5 Q. What kind of equipment did they use to bring
 6 dirt in?
 7 A. Probably a dump truck. I -- I didn't
 8 actually witness them doing that but I would
 9 assume that they brought dirt in on a dump truck
 10 and they just leveled it off.
 11 Q. So it would be smoothed over once the soil
 12 was brought in?
 13 A. Right. And the river, when -- back in
 14 the fifties, 1950s, I would say probably when I
 15 was about seven or eight years old, nine years
 16 old, the river would turn colors. I would wake up
 17 in the morning, it would be blazing red; the next
 18 day, it would be pink; the next day, it would be
 19 purple; the next day, it would be green. It was
 20 like it changed colors every two or three days.
 21 Q. And was that -- and you'd go south of the
 22 site, correct?
 23 A. Right downstream.
 24 Q. Do you know if the water was also turning
 25 colors north of where the site is, north of Smith

1 Street?
 2 A. I don't know. All I could tell you is
 3 what I saw from my back yard when I was this tall.
 4 Q. When you say, "this tall" --
 5 A. I was seven or eight years old.
 6 Q. Was there any kind of fence around the site?
 7 A. No, not that I can remember.
 8 Q. Was there a fence or a gate at Smith Street?
 9 A. Yeah. For the -- for the mill entrance.
 10 Q. Was there a gatekeeper there?
 11 A. I think they had a watchman that used to
 12 roam around.
 13 Q. Do you know his name?
 14 A. No. No. I know they had a watchman
 15 because he chased us out of there a couple of
 16 times.
 17 MS. GARYPIE: I'm going to mark this 3.
 18 (Whereupon, [REDACTED] Exhibit No. 3 was
 19 marked.)
 20 BY MS. GARYPIE:
 21 Q. I'm going to hand you what's been marked as
 22 Exhibit 3 and ask you to take a look at the
 23 photographs. Take your time.
 24 A. Yep. The dyes. Yep. That's one of
 25 their trucks.

1 Q. Have you seen these photographs before?
 2 A. I gave them to you.
 3 Q. When did you take these photographs?
 4 A. I don't know. Three or four months ago
 5 I guess.
 6 Q. Was that before EPA was working at the site
 7 or after?
 8 A. After. When I -- when I heard about the
 9 investigation, I remembered where one of these
 10 trucks was.
 11 Q. Where is that located?
 12 A. It's up in Smithfield.
 13 Q. Where?
 14 A. In a gravel place. They use it as a
 15 storage container. They must have bought it when
 16 the mill went out of business.
 17 Q. Do you know the name of the gravel place?
 18 A. No, I don't remember the name of it
 19 but --
 20 Q. What road is it on?
 21 A. You know where the Apple Valley Mall is?
 22 Q. Vaguely.
 23 A. It's about 5 miles from here, 5 or
 24 6 miles. It's not very far.
 25 Q. Do you recall seeing trucks like this at the

1 site when you visited it between -- the site
 2 between --
 3 A. Yeah.
 4 Q. -- 1960 and 1965?
 5 A. It's the same truck. They probably
 6 had -- I think they had a couple of them. They
 7 had some smaller ones. That's a huge tractor
 8 trailer box and they had some smaller ones that
 9 were labeled "Metro-Atlantic" like that and they
 10 had test tubes on them, you know.
 11 Q. You mean painted on the outside?
 12 A. Right. Right.
 13 Q. What were these trucks used for?
 14 A. They hauled the chemicals in and out of
 15 the business.
 16 Q. Do you know what products were manufactured
 17 by Metro-Atlantic?
 18 A. I know they made dyes; they made
 19 formaldehyde. They were into everything. I
 20 wouldn't be surprised if they made nerve gas for
 21 the United States military for all I know. Have
 22 you ever checked with the military?
 23 MS. GARYPIE: I have to ask the
 24 questions right now. Maybe we can talk
 25 afterwards.

1 A. Okay. No problem. Now, this is 1963?
 2 Q. Yes.
 3 A. Okay. Right around the time. All
 4 right. This -- this white area right here would
 5 have been the dump site area.
 6 Q. And if the -- let the record reflect that the
 7 witness is pointing to the southern portion of the
 8 site.
 9 A. Right. Even -- there's like a white,
 10 white color there. That's probably stuff that's
 11 been dumped.
 12 Q. And that would be directly across from Grover
 13 Street? Is that the name of that street?
 14 A. Yeah, pretty much. Yeah. Right around
 15 in that area. Very fuzzy photograph, hum? See,
 16 this is the area we used to hide in right here.
 17 We'd come up come up from here and you could --
 18 you could walk through the swamp right to the back
 19 of the area.
 20 Q. Just south of the --
 21 A. Right.
 22 Q. -- the white area?
 23 A. Right. Or you could come up the -- you
 24 could come up along the side right here. This is
 25 the area where it was all gray. It was -- it was

1 THE WITNESS: Okay. Sorry.
 2 Q. Do you know of any operations by
 3 Metro-Atlantic in any other location?
 4 A. Well, judging from the photographs,
 5 there's New Jersey right on one of these pictures.
 6 Where does it say that? Yeah, there's a name
 7 right here, right on the bottom.
 8 Q. Okay. Do you have any other knowledge of any
 9 other operations?
 10 A. No. They -- they may have had other
 11 operations but I don't -- I'm not aware of them.
 12 Q. Okay. I'm going to hand you a document that
 13 I'm not going to mark as an exhibit. But I'm
 14 going to describe it and, then, talk about it with
 15 you.
 16 The first document that I'm handing you is an
 17 aerial photograph and it's -- it has a label that
 18 states: "Woonasquatucket River, Providence, Rhode
 19 Island. PIC 9901116S. Date flown: September 2,
 20 1963. Source: ASCS. Frame No. 158. Approximate
 21 scale 1 inch equals 185 feet."
 22 I'm going to have you take a look at this
 23 document and let me know when you're finished.
 24 Okay? I'll have to ask you not to draw on this
 25 one.

1 discolored.
 2 Q. On the east side?
 3 A. Right. Right up to this area right
 4 here. It was completely void of life. It was
 5 like toxic waste beyond belief. Okay?
 6 Q. And where were the drum piles?
 7 A. Let's see -- can't use that pen, right?
 8 There would be piles of drums right all over this
 9 area. There seems to be a lot of stuff right
 10 here.
 11 Q. And when you say, "right here," you're
 12 referring right next to the southernmost building?
 13 A. Right. I can't tell what -- what this
 14 is.
 15 Q. That may be a bit in between?
 16 A. It looks like there's a lot of stuff
 17 right along the embankment right here.
 18 Q. And that's on the west side of the river --
 19 A. Right.
 20 Q. -- just a little north of the bare spot?
 21 A. Right. Yep. These look like drums,
 22 whatever the -- whatever they had there. I think
 23 they are the tops of drums but this is all -- this
 24 is all -- it looks like this is all trash, all the
 25 stuff that was just dumped right on the ground.

1 Q. The white area?
 2 A. Right. The white area and possibly
 3 right along here too.
 4 Q. And where is the -- is the white area that
 5 shows on this map, is that the area where there
 6 would be material dumped and the soil piled on
 7 top?
 8 A. Right. Right. Exactly. Yes.
 9 Q. Okay. I'm going to show you a second
 10 document, which I'm not going to mark as an
 11 exhibit but I'll read the label.
 12 It states: "Woonasquatucket River,
 13 Providence, Rhode Island. PIC 9901116S. Date
 14 flown: April 6th, 1965. Source: Statewide
 15 Planning. Frame No. 1090. Approximate scale
 16 1 inch equals 205 feet."
 17 I'm going to ask you to take a look at this
 18 aerial photograph and let me know when you're
 19 done.
 20 A. I think that's the river. This almost
 21 looks like a negative. Yeah. Here's all the
 22 stuff. There's all the barrels all stacked up.
 23 You can't really tell what they are because this
 24 is such a fuzzy photograph but those are all drums
 25 all in this area right here and back here, you can

1 A. All right? Right now it looks a little
 2 empty but --
 3 Q. And would there also be drums piled --
 4 A. Everywhere. The whole place was nothing
 5 but 55-gallon drums.
 6 Q. So moving further north --
 7 A. Right.
 8 Q. -- towards the southern end of the buildings,
 9 would you see drums?
 10 A. They'd be all over the place. They'd be
 11 all over the place. This was their parking lot.
 12 There's their -- see their big long tractor
 13 trailer?
 14 Q. Okay.
 15 A. That's the tractor trailer box.
 16 Q. So that's in the parking lot on the -- the
 17 west side of the site along the Woonasquatucket?
 18 A. Right. That's -- that's -- that's -- I
 19 don't know how long that is but that's a big one.
 20 There's nothing else there that's that long.
 21 That's your -- that's your tractor trailer box.
 22 Q. So were these -- were the conditions that are
 23 depicted here the conditions that you saw between
 24 1960 and 1965?
 25 A. Yeah. Basically. This was their --

1 see little white specks and stuff. That's --
 2 that's all debris.
 3 Q. And the area that you're pointing to, that's
 4 across from Grover Street?
 5 A. Right. Right.
 6 Q. And the specks that you're talking about --
 7 A. Right. That's -- that's the dump site.
 8 Q. The dump site is right directly across from
 9 Grover?
 10 A. Pretty much.
 11 Q. And moving up that little road north --
 12 A. Right.
 13 Q. -- you see drum piles along --
 14 A. Drum piles. That -- that is the road
 15 that comes down and, then, they just -- this area
 16 here would be a little space between where the --
 17 the pyramids of drums were and the dump itself, so
 18 they could turn around --
 19 Q. Okay.
 20 A. -- and come back up.
 21 Q. Is that why there's a circle at the site?
 22 A. Yeah. Kind of. Yeah. But that area
 23 could be filled and then emptied; filled, emptied;
 24 depending on what inventory they had at the time.
 25 Q. Okay.

1 this was their truck lot where they parked. Now,
 2 these are pretty good size trucks.
 3 Q. And that's at the southern end --
 4 A. Right.
 5 Q. -- of the parking lot?
 6 A. Right. I think they had four or five
 7 good size trucks and the barrel recycling plant
 8 may have had one or two but they were different
 9 type. They were different type trucks because
 10 they were hauling barrels and lots of them.
 11 Q. Did the barrel company's trucks have tops on
 12 them or were they just straight --
 13 A. No, they were open. They were
 14 straight-body trucks with flatbeds with removable
 15 sides, like steel inserts, so you could put the
 16 drums on and just pull the inserts out and, then,
 17 unload them --
 18 Q. Okay.
 19 A. -- like a real quick operation. That's
 20 if they were empty.
 21 Q. I've been using the name "Metro-Atlantic"
 22 with regard to the chemical company.
 23 A. Right.
 24 Q. Were there any other names that were
 25 associated with the chemical company?

1 A. I have no idea. I imagine they did
 2 business all over the place but you'd see their
 3 trucks on the road, you know, like anything
 4 else --
 5 Q. Did the --
 6 A. -- any other business.
 7 Q. Did the chemical company ever change names?
 8 A. Not that I know of.
 9 Q. Is there anything else that I haven't asked
 10 about that may be helpful to EPA in its
 11 investigation that you can think of?
 12 A. That's basically -- I think that's
 13 basically about it. Other than the drums, the
 14 drums would get washed off the embankment right
 15 here in a real bad rainstorm and would be flooded
 16 into that area.
 17 Q. That would be on the west side of the site?
 18 A. Right. It would come tearing through
 19 here and it would just pick them right up and just
 20 like a toilet, they'd be gone. Woof! And I mean
 21 I'm talking 30, 40, 50 drums in a whack. We are
 22 not talking one or two; we are talking a lot.
 23 Q. Did you ever visit the site when the Brook
 24 Village building or the Centredale Manor building
 25 was being built?

1 A. Oh, yeah. I was -- I was -- I was
 2 wondering why they were putting up a high-rise
 3 building to put elderly -- to house elderly people
 4 on a toxic waste site.
 5 Q. Did you voice that concern to anyone else?
 6 A. Not at the time because I figured nobody
 7 would listen to me anyways. You know, politics in
 8 this area is -- they are going to look at you,
 9 like, yeah, okay, sure.
 10 Q. Did you visit the site when there was
 11 construction going on for either building?
 12 A. I used to look at it from the parking
 13 lot across the street there, you know, where the
 14 Cumberland Farms is.
 15 Q. Okay. So that's on Smith Street behind
 16 Centredale Manor?
 17 A. Right.
 18 Q. Like between Centredale Manor and Smith
 19 Street?
 20 A. Yeah. I never really walked down here
 21 and got, you know, onto the site because, you
 22 know, because they were working on it but you
 23 could see them working on it from up here and they
 24 were taking out drums out of the ground and debris
 25 when they were digging the foundation for this

1 building.
 2 Q. When you say, "this building," do you mean
 3 Centredale Manor?
 4 A. Which one is in the back?
 5 Q. Centredale Manor.
 6 A. Centredale Manor. Right. I heard that
 7 they took out 200, 300 drums out of the ground
 8 that were either full of chemicals or just
 9 flattened out, run over or whatever.
 10 Q. Did you see any drums coming out of the
 11 ground that contained residue or material?
 12 A. I didn't get that close. I mean I
 13 imagine from, what I'd seen before, that there had
 14 to be some that were still full of whatever they
 15 had in them.
 16 Q. Were the workers that were handling the drums
 17 in any sort of safety clothing?
 18 A. I don't remember. You mean like the
 19 stuff the EPA wears? Those white suits and stuff
 20 like that?
 21 Q. Right.
 22 A. I don't think so. I don't remember
 23 anybody in any -- any toxic suits. Before they --
 24 before they had done -- started construction on
 25 that, I had heard about it and I took a walk back

1 there and there was still stuff on the surface;
 2 there were drums that were split open.
 3 Q. Now, is that -- let me go back. Was that --
 4 was that before Centredale Manor was built?
 5 A. Right.
 6 Q. And was that after Brook Village was built or
 7 before, do you recall?
 8 A. It was before. I think it was --
 9 Q. Before either building?
 10 A. -- before either building was up.
 11 Q. Okay.
 12 A. They had -- they had knocked down --
 13 Q. What -- what year was this?
 14 A. Oh, God, 1980, 1981. I can't be sure.
 15 Q. Okay.
 16 A. But I walked this area. I came down in
 17 here because they had taken the mill down. I
 18 think it was ripped down, burned down or whatever
 19 and I had walked back here.
 20 Q. When you say, "walked back here," do you mean
 21 you walked from --
 22 A. Smith Street down through the area
 23 because it was a --
 24 Q. So you went south from Smith Street?
 25 A. Right.

1 Q. Okay.
 2 A. There were drums on the ground that were
 3 half -- half crushed and I lifted one of them up
 4 and there was this crystallized blob of
 5 multicolored chemical compounds of some kind that
 6 were in the drum and they were like red, red,
 7 white, and -- and green color like. It looked
 8 like a mixture of different stuff and it was a
 9 solid. It wasn't -- it wasn't a sludge or wet
 10 type stuff; it was a solid, and it was just lying
 11 on the ground half run over like somebody had hit
 12 it with a truck or -- or flattened it with a
 13 bulldozer or something like that and I lifted it
 14 up and I looked inside of it and I went, "Jesus,
 15 they never did clean this place up, you know."
 16 Q. And how many -- how many drums did you see on
 17 that walk?
 18 A. On that walk? It was probably 20.
 19 Q. Was that the only one that contained
 20 material?
 21 A. That I noticed. I didn't flip them all
 22 over, you know, and get -- and get real personal
 23 with them or anything like that. I was just -- I
 24 just flipped that one over because I was curious.
 25 Q. Did you see anything else on that walk that

1 Q. To the best of your knowledge, was it well
 2 known in the community at the time the buildings
 3 were being built that it had been used for
 4 chemical manufacturing and drum recycling?
 5 A. It was in the newspaper. It was in the
 6 Journal that they took barrels out; that they took
 7 chemicals out of the ground. That should have
 8 stopped them right there because they didn't clean
 9 up the whole site; they just did the foundation
 10 for the building.
 11 Q. What about right before they started building
 12 the buildings? Would it have been known in the
 13 community at that time that the site had been used
 14 for chemical manufacturing and drum recycling?
 15 A. Absolutely. That's a huge complex. I
 16 mean it was -- it had been in business for 40
 17 years or whatever, something to that effect. I
 18 don't know when they -- when they actually opened.
 19 Probably in the 1940s. Do you know? You don't?
 20 Okay.
 21 MS. GARYPIE: I have to let you answer
 22 the questions.
 23 THE WITNESS: All right. I -- I would
 24 say, yes, I would say, because everybody that
 25 lived along this river knew that it changed colors

1 was unusual?
 2 A. Just debris. Just, you know, piles of
 3 wood and cardboard and trash like that that had
 4 been left behind from the demolition of the
 5 building.
 6 Q. Were there names on any of the drums?
 7 A. No. This was one was rusted so bad, I
 8 mean it fell apart when I picked it up, literally
 9 fell apart. Most -- most of the chemicals that
 10 they used were really toxic and very volatile.
 11 Like they'd eat steel; they'd corrode metal real
 12 easy, so if they left it in the -- in a drum,
 13 eventually this dissolved the drum.
 14 Q. Is there anything else that you recall from
 15 that time when -- when the buildings were going
 16 up?
 17 A. I was just awed that they were doing it
 18 because it was a flood plain and it was a toxic
 19 waste site and I thought it was general knowledge
 20 that -- that it was.
 21 Q. Did you talk to your neighbors about it?
 22 A. No. Nobody cared. It was out of our
 23 hands. We couldn't do anything about it. You
 24 know, even if we complained to city hall, what are
 25 they going to do?

1 all the time and nobody ever goes out on this
 2 river.
 3 I mean you never see boats out there;
 4 you never see people swimming in it and if you
 5 lived along the embankment, you knew better.
 6 Okay? You don't drink the water; you don't eat
 7 the mud; you don't eat the fish out of the river.
 8 I mean it was just beyond -- beyond comprehension
 9 to eat, you know, to eat or drink anything out of
 10 that river. Never mind swim in it, my God.
 11 Q. Would -- do you know of anyone who swam in
 12 the river?
 13 A. No.
 14 Q. No?
 15 A. No, not on this end.
 16 Q. Not on the south end of the site?
 17 A. Not on that south end of the site. I
 18 mean I could count on two -- I could count on both
 19 hands how many people I actually saw going down
 20 that river in a boat; never mind swimming in it.
 21 Q. Is there anything else you can think of that
 22 might be helpful for us to know?
 23 A. That's about it I would say.
 24 Q. Is there anyone you could think of that we
 25 might talk to, to get more information about the

1 operation or the history of the site?
 2 A. See, I wasn't employed there and I
 3 didn't know anybody personally that worked there.
 4 I was just a kid, you know, 13-year-old kid,
 5 14-year-old kid running around. It was just a
 6 playground to us. It was someplace to go and hang
 7 out, fish or try to fish.
 8 I think that's about all I can tell you about
 9 it unless you want to, you know, go over these
 10 maps or if you got any better or clearer
 11 photographs.
 12 Q. Unfortunately, no.
 13 A. Okay. But that whole -- that whole
 14 spot, that is a dump site. Have you got any
 15 photographs from the seventies?
 16 Q. Yes. Let me hand you a photograph again. I
 17 won't mark this as an exhibit but the label reads:
 18 "Woonasquatucket River, Providence, Rhode Island.
 19 PIC 9901116S. Date flown: March 9th, 1970.
 20 Source: U.S.G.S. Frame No. 225. Approximate
 21 scale 1 inch equals 185 feet."
 22 Let me hand you that and take a minute to
 23 look at it.
 24 A. Bingo. There it is. This is -- this is
 25 a much clearer photograph. All right. There's

1 A. Yeah. That's -- that's your main road
 2 right there and there's all drums. This is all
 3 drums, all the way down the embankment right to
 4 where you get to the ground where the dump starts
 5 and this is all drums right here.
 6 Q. So on both sides of the roads, you are seeing
 7 --
 8 A. Oh, yeah, both sides of the roads, all
 9 over the place; they were just everywhere.
 10 Q. And if you move further north from the
 11 cleared area that you're talking about so you're
 12 just north of Steere Avenue --
 13 A. Yeah.
 14 Q. -- across from Steere Avenue, there's sort of
 15 a blank space or flat space?
 16 A. That's -- that's --
 17 Q. Do you know what that is?
 18 A. I have no idea. I have no idea. Were
 19 they are going to put up a building there or
 20 something?
 21 Q. So that was not there when you visited the
 22 site?
 23 A. I don't remember it. I don't remember
 24 what they did with that. But these -- these are
 25 all drums; all this area is all drums.

1 all your drums piled up right there. You can
 2 see -- you can see the tops of them.
 3 Q. Hold on just a minute.
 4 A. Right here.
 5 Q. What you're pointing to is the southern end
 6 of the site and it's just across Grover Street but
 7 a little south?
 8 A. Yeah. Actually, it lines up with this
 9 street, the tip of the --
 10 Q. Is it Redlum?
 11 A. Redfern.
 12 Q. Redfern.
 13 A. See, this -- this photograph here in
 14 1970 shows it farther back.
 15 Q. Okay.
 16 A. It's actually progressing farther back.
 17 All right?
 18 Q. All right.
 19 A. And here's your piles of drums right
 20 there.
 21 Q. And that's just north of the cleared area?
 22 A. Right. North of the cleared area where
 23 they come down and turn around and go back up the
 24 road.
 25 Q. And that's just to the right of the road?

1 Q. So that's on either side of the road pretty
 2 much from the building south?
 3 A. Right. Right. Right. Have you got a
 4 photograph from '75?
 5 Q. What I have is I have another photograph that
 6 is labeled: "Woonasquatucket River, Providence,
 7 Rhode Island. PIC 9901116S. Date flown:
 8 May 5th, 1976. Source: EPA. Frame No. 62.
 9 Approximate scale 1 inch equals 270 feet." Why
 10 don't you take a look at that?
 11 A. That looks like the operation is gone
 12 now. I don't see any buildings.
 13 Q. I don't either.
 14 A. It looks like it's been cleared right
 15 out. When did they go out of business?
 16 MS. GARYPIE: That's about it --
 17 THE WITNESS: Okay. It's gone.
 18 MS. GARYPIE: -- for photos.
 19 THE WITNESS: Everything has been
 20 bulldozed. Okay? And the dump site is still
 21 there. You can still see it.
 22 Q. So you're pointing to the lighter area --
 23 A. Right.
 24 Q. -- that's just across from Grover Street?
 25 A. Exactly.

1 Q. A little bit south?
 2 A. Yeah. That's gone. It's -- it's --
 3 everything is missing now. This is where I was in
 4 the parking lot while I was watching them put up
 5 the buildings right here --
 6 Q. Okay.
 7 A. -- from this vantage point and the drums
 8 that I found were right -- right -- right in this
 9 area --
 10 Q. Okay.
 11 A. -- right there.
 12 Q. So that's -- from where -- let's see --
 13 A. That's Smith Street.
 14 Q. That's Smith Street?
 15 A. That's where Cumberland Farms would be
 16 right now.
 17 Q. Which is adjacent to the building that's
 18 depicted here?
 19 A. Right. That's burned. That's leveled.
 20 Q. The large building on the south side?
 21 A. Right. That's gone. Cumberland Farms
 22 is right there and you could walk down in the
 23 parking lot and you could see the construction
 24 going on for Centredale Manor and Brook Manor and
 25 this building I think went up first, I'm sure, but

1 I took a walk down here just to be curious and I
 2 found drums that were still, you know, lying
 3 around half crushed with crap in them.
 4 Q. So that was before Brook Village was up or --
 5 A. It was either just before or just after
 6 they put the building up.
 7 Q. Okay. Did you see any drums in the -- where
 8 Brook -- in the area where Brook Village is now
 9 located?
 10 A. No. They were mostly -- see, this was
 11 all bulldozed over. This was all --
 12 Q. The whole site?
 13 A. The whole site was cleaned out and there
 14 was just remnants of what was -- what was there,
 15 you know, stuff that didn't get carted away
 16 because it was off to the side or something like
 17 that and, you know, like in the bushes, you know
 18 what I mean on the embankment of the river.
 19 Q. So it would be close to either the river or
 20 the tailrace?
 21 A. Right. They cleaned out the middle of
 22 it and whatever debris was left on the sides, they
 23 didn't bother with it; they just left it there.
 24 Q. Did you ever see any bulldozers pushing
 25 debris towards either the tailrace or the river?

1 When I say, "the tailrace", I mean the east side
 2 of the site?
 3 A. All I know is there were bulldozers back
 4 there but I didn't physically see them. They
 5 probably did fill some of it in or whatever. It's
 6 possible.
 7 Q. But you didn't see that yourself?
 8 A. No, that I didn't see. I just happened
 9 to be wandering through there and I stumbled
 10 across drums that were half run over and, you
 11 know, stuff was oozing out of them or the one I
 12 picked up was like a crystallized multicolored
 13 blob of chemicals. That's about all I can tell
 14 you.
 15 MS. GARYPIE: Okay. I think we are done
 16 for this evening. Thank you.
 17 (Adjourned at 7:15 p.m.)
 18
 19
 20
 21
 22
 23
 24
 25

1 STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
 2 KENT, Sc.
 3
 4 CERTIFICATION
 5 I, VIVIAN S. DAFOULAS, Registered Merit
 6 Reporter/Certified Realtime Reporter, Notary
 7 Public in and for the State of Rhode Island, do
 8 hereby certify that the witness was first duly
 9 sworn to tell the truth, the whole truth and
 10 nothing but the truth in the matter of CENTREDALE
 11 MANOR SUPERFUND SITE, NORTH PROVIDENCE, RHODE
 12 ISLAND; that I am in no way related or have any
 13 interest in said matter and that the testimony of
 14 said witness was duly recorded by me in
 15 computerized stenotype and is a true and accurate
 16 transcription of my notes.
 17 IN WITNESS WHEREOF, I have hereunto set
 18 my hand this 2nd day of December, 1999.
 19
 20
 21
 22
 23
 24
 25

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

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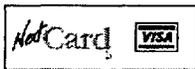
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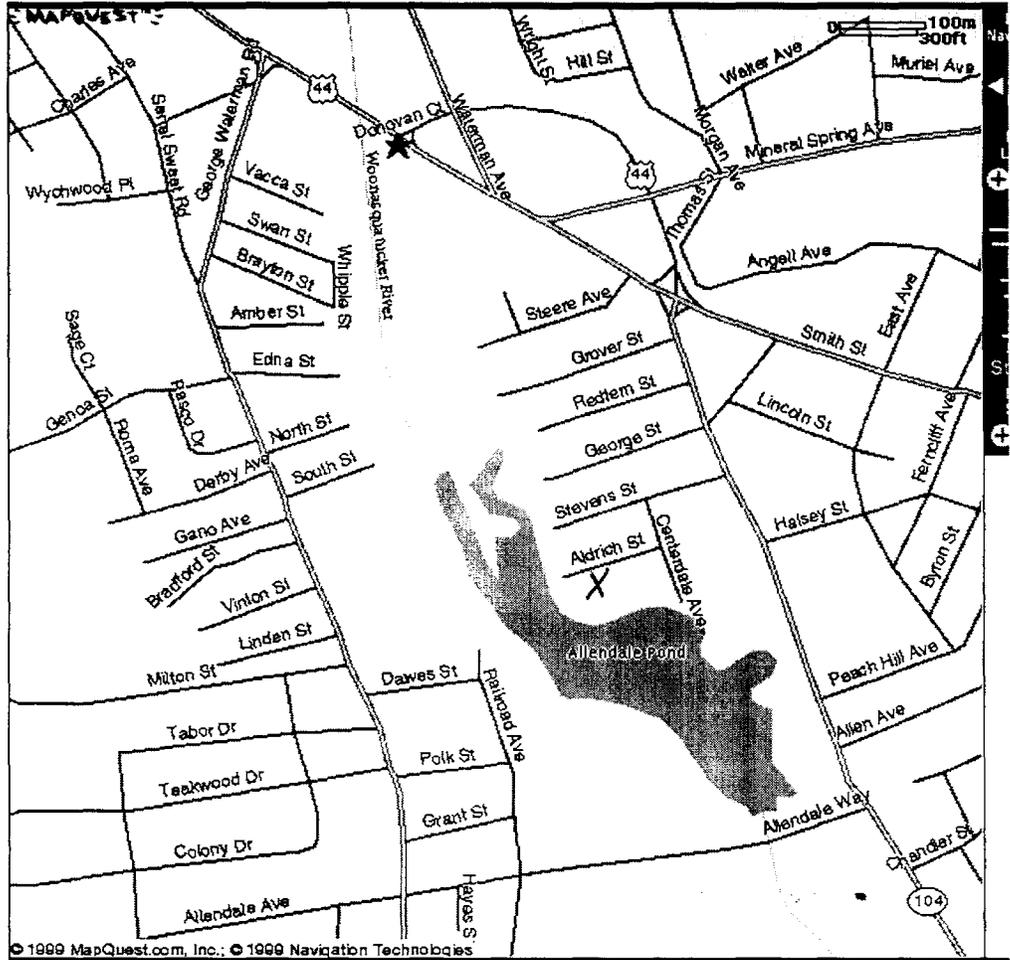
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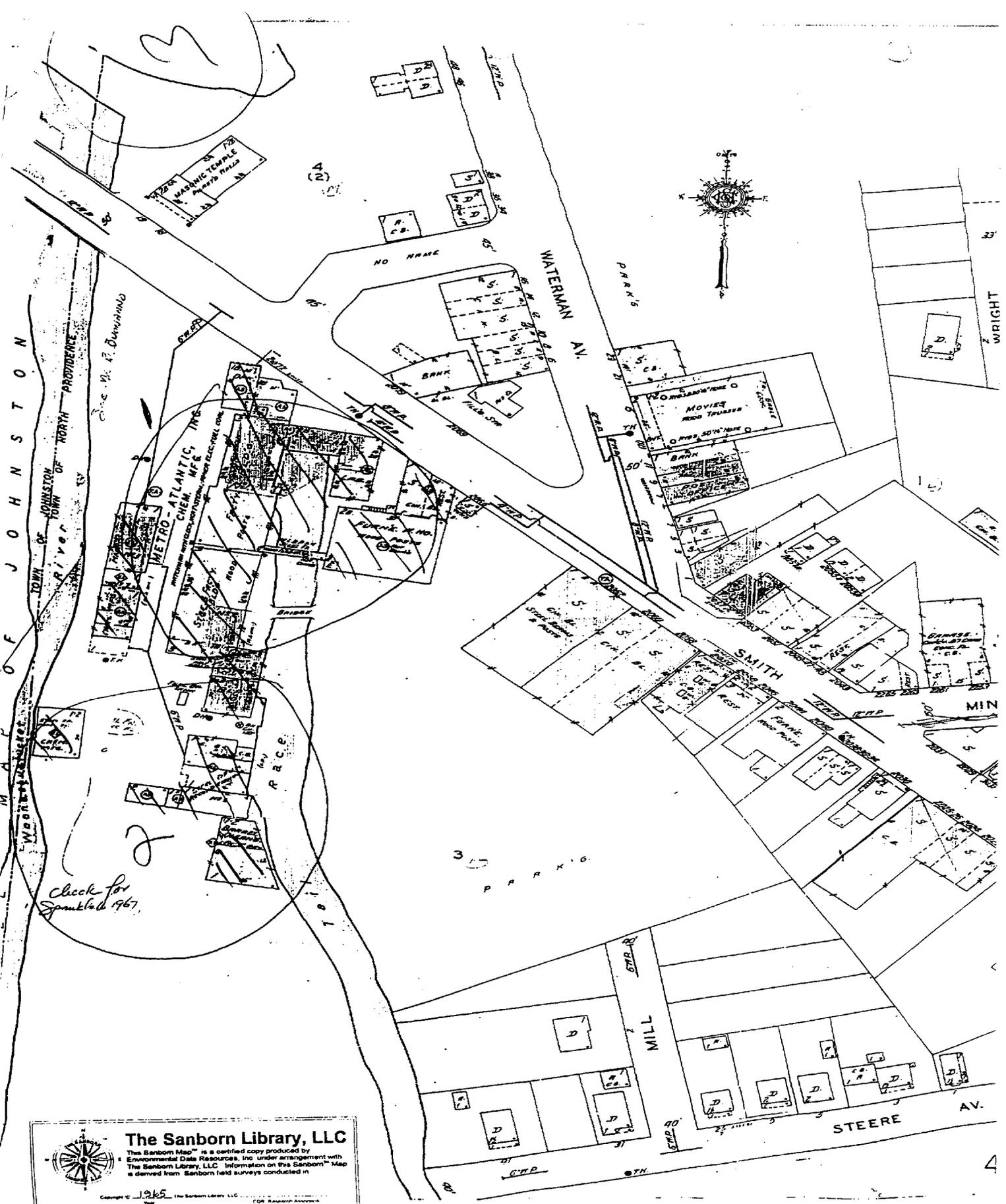
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