



1 For your information, under Superfund, there  
2 are four broad categories of potentially  
3 responsible parties.

4 The first are persons who arranged for  
5 disposal or transport of hazardous substances to  
6 the Site known as generators.

7 The second are transporters who selected the  
8 Site for the disposal of hazardous substances.

9 The third is past owners and operators of the  
10 Site, who owned and operated at the time of a  
11 release or who transferred ownership without  
12 disclosing knowledge of a release and, four,  
13 current owners and operators.

14 So that's our introduction. If you need to  
15 take a break at any time, just let me know; a  
16 glass of water or anything like that.

17 A. Okay.

18 Q. I'm going to ask you to give all your answers  
19 out loud, so if you nod I'll have to ask you  
20 whether you are saying "yes" or "no".

21 A. Okay.

22 Q. And I'll ask you to wait for me to finish my  
23 question before you answer, so the court reporter  
24 can get everything down.

25 A. All right.

1 Q. And what exactly does your work entail?

2 A. We provide telephone service; we design  
3 the facility to bring phone service to your home,  
4 to businesses, pole lines, cable, fiber cable.

5 Q. How long have you had that position?

6 A. Off and on? About 26 years. I've had  
7 other jobs there but as an engineer, about 26.

8 Q. And did you prepare for this administrative  
9 deposition in any way?

10 A. No.

11 Q. Have you ever been employed by a chemical  
12 company that operated at this site?

13 A. Yes.

14 Q. And what's the name of that company? What  
15 company?

16 A. Metro-Atlantic.

17 Q. What years were you working for  
18 Metro-Atlantic?

19 A. Let me see -- August of '63 through  
20 January of '65. That's the best I can remember.  
21 It's a long time ago.

22 Q. Yes, it was. What was your title when you  
23 were at Metro-Atlantic?

24 A. Honestly, I have no idea.

25 Q. How about your duties, what were they?

1 Q. And you've already stated your name. If you  
2 could give your address.

3 A. 7 Port Avenue, Jamestown, Rhode Island.

4 Q. And your birth date?

5 A. 9/11/44.

6 Q. And what is the highest level of education  
7 that you've completed?

8 A. I have an associate's degree in  
9 engineering.

10 Q. And have you had any military service?

11 A. Yes.

12 Q. And what was that?

13 A. I was in the Air Guard from '68 to '74.

14 Q. And are you currently employed?

15 A. Yes.

16 Q. Where is that?

17 A. Bell Atlantic.

18 Q. What do you do there?

19 A. I'm an engineer.

20 Q. What type of engineer?

21 A. Actually, a field engineer but my  
22 official title?

23 Q. Yes.

24 A. Let's see -- what do they call us this  
25 week? They call us design specialists.

1 A. I'd say, basically, like a laborer.

2 Q. What type of work did you do every day?

3 A. Let's see -- we packed chemicals; we  
4 helped in the making of chemicals, and just  
5 routine work that we did. Exactly, it could be  
6 anything from loading trucks, to unloading trucks.

7 Q. Did you receive any type of training at  
8 Metro-Atlantic?

9 A. Technical training?

10 Q. Any type of training.

11 A. Other than on the job, I'd say no.

12 Q. Can you describe -- well, strike that. Let  
13 me start over. Did you work in one area of the  
14 site primarily?

15 A. No, not really.

16 Q. Okay.

17 A. It was an old mill building, so it  
18 was -- it could be anywhere within that building  
19 or even outside unloading trucks.

20 Q. What products were manufactured by  
21 Metro-Atlantic?

22 A. I know they made a water repeller for  
23 clothes and, then, they made this powdered  
24 compound. I have no idea what it was for.

25 Q. Anything else?

Page 9

1 A. Towards the end before I left they  
 2 made -- they were making -- they called it a weed  
 3 killer but I really don't know what it was.  
 4 Q. Going back to the water repellent, what did  
 5 that product look like?  
 6 A. It was white.  
 7 Q. Was it a liquid or a solid?  
 8 A. Liquid.  
 9 Q. Was it thick or thin?  
 10 A. Milky.  
 11 Q. Was the -- what was it transported in?  
 12 A. Metal drums.  
 13 Q. How large?  
 14 A. Fifty-five gallon.  
 15 Q. Did those drums have labels on them?  
 16 A. Yeah. They were labeled on the tops.  
 17 What they said, I don't remember.  
 18 Q. What color were the drums?  
 19 A. I'm going to say black.  
 20 Q. Any other color?  
 21 A. Not that I recall.  
 22 Q. Did it have any type of odor?  
 23 A. I don't recall.  
 24 Q. Did any person ever have a reaction when they  
 25 breathed the fumes?

Page 10

1 A. Not that I know of.  
 2 Q. Did you ever notice a reaction on the  
 3 water -- strike that.  
 4 Did you ever notice a reaction of the water  
 5 repellent with any other chemicals?  
 6 A. No.  
 7 Q. What part of the facility -- strike that.  
 8 Let me move on to the powdered compound. What did  
 9 that look like?  
 10 A. It was a goldish powder in the final  
 11 stage.  
 12 Q. What was that transported in?  
 13 A. Fiber drums.  
 14 Q. Did those drums have labels?  
 15 A. I would assume, yes. They labeled  
 16 everything. They were shipped.  
 17 Q. What size were those drums?  
 18 A. They were about that tall and about that  
 19 big around, so I would say they were probably  
 20 around 20 gallons I would say, if they were that  
 21 much. They were fiber; they weren't steel.  
 22 Q. And when you say, "that tall", about how high  
 23 would that be?  
 24 A. Two feet.  
 25 Q. When you say, "about that wide," how wide

Page 11

1 would that be?  
 2 A. About 14 inches I think.  
 3 Q. Was there any odor associated with that  
 4 powdered compound?  
 5 A. No.  
 6 Q. Did you notice any reaction of any person  
 7 with any fumes -- coming in contact with the  
 8 powder or coming in contact with the fumes from  
 9 the powder?  
 10 A. No, no.  
 11 Q. Did you notice that powdered compound  
 12 reacting with water?  
 13 A. It was water soluble. It did burn.  
 14 Q. When you say it burned, what do you mean?  
 15 A. Well, they used to have this machine.  
 16 They dried it. It was made like a flake and they  
 17 dried it in this machine and the machine, at one  
 18 time, caught fire.  
 19 Q. Was anyone injured during the fire?  
 20 A. No.  
 21 Q. Did you witness the fire?  
 22 A. That was in an -- an outbuilding. I was  
 23 in the main building. I saw it, the building on  
 24 fire. That was about it.  
 25 Q. And turning to the weed killer, what did that

Page 12

1 look like?  
 2 A. It was a reddish liquid color but when  
 3 you added water to it, it turned bright yellow.  
 4 Q. Are there any other characteristics that you  
 5 remember about it?  
 6 A. No. I said it was red, it was reddish  
 7 in color but, no. It was heavy. I mean it  
 8 weighed a lot.  
 9 Q. What was it shipped in?  
 10 A. I would assume it was barrels but,  
 11 honestly, I can't say that for sure.  
 12 Q. What raw materials were used to produce the  
 13 water repellent?  
 14 A. I honestly can't say because I wasn't  
 15 involved in the manufacturing of it.  
 16 Q. Okay. Were you involved with the manufacture  
 17 of the powdered compound?  
 18 A. Yeah, in the sense that -- not like in  
 19 the beginning stages. They had, I guess, not  
 20 chemists but they actually had chemical workers  
 21 that would make it but the only thing I got  
 22 involved in was the drying of it. It was made  
 23 into a -- a liquid that they -- it was condensed  
 24 and then it was dried on a drum that made it into  
 25 flakes and that's where I came in. From there, it

1 was put into barrels and sent across and dried.  
 2 Q. Was there some type of an oven or furnace  
 3 where it was dried?  
 4 A. Yeah. That was the machine I saw that  
 5 caught fire.  
 6 Q. How large was that?  
 7 A. I'd say it was about 8 feet wide and  
 8 about 20 feet long.  
 9 Q. Was there any waste material that was  
 10 generated in the production of the powdered  
 11 compound?  
 12 A. Yeah. Part of it, I guess, they  
 13 filtered it and all that residue that was filtered  
 14 was waste.  
 15 Q. When you say it was filtered, was that when  
 16 it was in the liquid stage?  
 17 A. Yeah. Yes. That was part of the liquid  
 18 stage.  
 19 Q. How would it be delivered to the area where  
 20 it was drying?  
 21 A. From -- from the filter, from the press,  
 22 the filter press, I think it was piped to a big  
 23 tank and from the tank it went to a drier drum.  
 24 Q. And do you know what happened to the material  
 25 that was filtered out?

1 A. When I first started here, they used to  
 2 wash it down the drain. Then they started to put  
 3 it into Dumpsters.  
 4 Q. When it was going down the drain, was that a  
 5 floor drain?  
 6 A. Uh-hum.  
 7 Q. That was yes?  
 8 A. Yes. That's right. You can't record  
 9 nods.  
 10 Q. And how long was it directed down the floor  
 11 drain? That is to say, was it a year or a month  
 12 or --  
 13 A. I honestly can't say. It was  
 14 probably -- probably wasn't a year because I  
 15 wasn't there that long but it was at least a  
 16 couple of months.  
 17 Q. And then you said it went into a Dumpster?  
 18 A. Right.  
 19 Q. How large was that Dumpster?  
 20 A. I think it's like one of those 30-yard  
 21 Dumpsters.  
 22 Q. Do you recall the color of the Dumpster?  
 23 A. I don't know.  
 24 Q. Was there a label on the Dumpster?  
 25 A. There probably was but I -- I honestly

1 can't say.  
 2 Q. What happened to the material after it was in  
 3 the Dumpster?  
 4 A. It was trucked away.  
 5 Q. Where was it trucked to?  
 6 A. I have no idea.  
 7 Q. Do you know if the Dumpsters went onto --  
 8 excuse me. Let me start again.  
 9 Did the Dumpsters get trucked out of the  
 10 front of the facility onto Route 44?  
 11 A. Yeah. They went out the main gate.  
 12 Q. Who was driving the trucks?  
 13 A. I don't know.  
 14 Q. Were they Metro-Atlantic employees?  
 15 A. No, no.  
 16 Q. Do you recall the color of the trucks?  
 17 A. No.  
 18 Q. The size of the trucks?  
 19 A. They were ten-wheel trucks. That's all  
 20 I can tell you. They were regular Dumpster  
 21 trucks. You know, the body slides off.  
 22 Q. Were there any names written on the sides of  
 23 the trucks, on the doors for instance?  
 24 A. If there were, I don't remember.  
 25 Q. Okay. Turning to the weed killer --

1 A. Uh-hum.  
 2 Q. -- where was that manufactured at the  
 3 facility?  
 4 A. That was made in the outbuilding next to  
 5 the river here.  
 6 Q. Is that next to the Woonasquatucket River?  
 7 A. I believe so.  
 8 Q. How large was that outbuilding?  
 9 A. I'd say it was about 20 by 20 square.  
 10 Q. Is that 20 feet by 20 feet?  
 11 A. Yes.  
 12 Q. Okay.  
 13 A. And probably about 20 feet tall. Maybe  
 14 not that tall but about 20 feet I guess.  
 15 Q. What raw materials were used to manufacture  
 16 the weed killer?  
 17 A. They used some of that powder, I know  
 18 that.  
 19 Q. That's the powdered compound you were  
 20 referring to --  
 21 A. Right.  
 22 Q. -- earlier?  
 23 A. But they used that in almost everything  
 24 they made. That was, like, the main ingredient.  
 25 Then they used some type of a chemical and those

1 came in white and green drums. What else -- I  
 2 don't -- I don't recall. Oh, and some -- they  
 3 used acids in them.  
 4 Q. How were the acids delivered?  
 5 A. They were delivered in a big truck,  
 6 bulk -- well, bulk acid tanker.  
 7 Q. Was there a tank in a building that held acid  
 8 or would it be piped directly from the truck into  
 9 the building?  
 10 A. No, there was a tank in the building.  
 11 Q. Are there any other raw materials you can  
 12 recall, even if it's not by name; if it's by  
 13 color?  
 14 A. I know -- I know we used alcohol. I  
 15 think it was methanol but I don't know in which  
 16 product it was used.  
 17 Q. Was that just in the outbuilding or was that  
 18 used elsewhere in the facility?  
 19 A. That was elsewhere in the facility.  
 20 Q. And focusing on the weed killer, how did that  
 21 manufacturing process work?  
 22 A. It was -- it was mixed in a big kettle  
 23 and it was cooked, basically, with steam and after  
 24 so long, it was ready.  
 25 Q. Did it change consistency or color as it was

1 recall that happened when the weed killer was  
 2 being manufactured?  
 3 A. No.  
 4 Q. You mentioned you were at Metro-Atlantic from  
 5 August '63 to January '65?  
 6 A. Yes.  
 7 Q. Were you working with both the powder and --  
 8 the powdered compound and the weed killer during  
 9 all of that time or did you move from one to the  
 10 other?  
 11 A. I'd say I moved from the powder to the  
 12 weed killer.  
 13 Q. About how long did you work with the powder  
 14 compound?  
 15 A. Probably about a year but that wasn't  
 16 continuously.  
 17 Q. What do you mean?  
 18 A. I was just a laborer, so they'd give me  
 19 that assignment and, then, they'd give me  
 20 something else to do, so it wasn't an ongoing  
 21 thing that you did every -- every day.  
 22 Q. So you might get moved around --  
 23 A. Right.  
 24 Q. -- from one day to the next?  
 25 A. Might be loading a truck half a day;

1 cooking?  
 2 A. I guess it did because, you know, it  
 3 went into the kettle, a different color material  
 4 and, then, it came out as this reddish material.  
 5 To be honest with you, it reminded me a lot of  
 6 blood, the consistency of it, but that's just my  
 7 opinion.  
 8 Q. Was there waste that was produced in that  
 9 process?  
 10 A. Yeah. It was the -- the acid was  
 11 wasted.  
 12 Q. And how was the waste acid disposed of?  
 13 A. In the river.  
 14 Q. How did it get from the building to the  
 15 river?  
 16 A. Piped.  
 17 Q. How long was the pipe extending out of the  
 18 building?  
 19 A. About 20 feet. That's how close the  
 20 building was to the river.  
 21 Q. Did the pipe touch the water?  
 22 A. I'm going to say no.  
 23 Q. You mentioned that there was a fire  
 24 associated with the powdered compound at one  
 25 point. Was there any type of event that you

1 might be in various stages of the manufacturing  
 2 process of that or unloading barrels that would  
 3 come in.  
 4 Q. How many employees did Metro-Atlantic have  
 5 during that time?  
 6 A. Guess, educated guess?  
 7 Q. Sure.  
 8 A. That I know of? I mean because they had  
 9 another facility too. I don't know. I'd say  
 10 around 24 maybe.  
 11 Q. So that's 24 at the North Providence  
 12 facility?  
 13 A. Uh-hum.  
 14 Q. Where was the other facility?  
 15 A. That, I think, was in Greenville, South  
 16 Carolina.  
 17 Q. Do you know how many people worked there?  
 18 A. I have no idea.  
 19 Q. Did you ever go there?  
 20 A. No.  
 21 Q. Who supervised you during the time you worked  
 22 for Metro-Atlantic?  
 23 A. I guess it would be Larry Bello.  
 24 Q. How do you spell that last name?  
 25 A. B-E-L-L-O. He was like the plant

1 superintendent I guess you'd call him.  
 2 Q. Do you know if he still lives in this area?  
 3 A. I honestly don't know.  
 4 Q. Do you recall the names of other people who  
 5 worked for Metro-Atlantic?  
 6 A. I can remember some first names. That's  
 7 about it.  
 8 Q. Okay. Why don't you give me those?  
 9 A. There was a Harry; there was a Ray; a  
 10 Gus. There was a Jay; he was the owner's son.  
 11 Then there was Bernie; he was one of the owners.  
 12 George. That's about it, I guess, that I can  
 13 remember.  
 14 Q. How many owners were there?  
 15 A. Honestly I couldn't really tell you. I  
 16 know there were the Buonannos and there was  
 17 supposedly someone else in the south but that was  
 18 only hearsay. I don't know that.  
 19 Q. And you mentioned that Bernie was one of the  
 20 owners?  
 21 A. Uh-hum.  
 22 Q. Was he in a supervisory type of position?  
 23 A. Not really. I didn't say -- he just sat  
 24 in the front office. That's about all I can tell  
 25 you.

1 A. I would imagine they would keep it but  
 2 I -- offhand I don't know who would do it.  
 3 Q. So you yourself then did not keep written  
 4 records --  
 5 A. No.  
 6 Q. -- while you were working?  
 7 A. No.  
 8 Q. Do you know if the same products were  
 9 manufactured in South Carolina?  
 10 A. I honestly don't know that at all.  
 11 MS. GARYPIE: At this point, I have a  
 12 document that I'm going to mark as Exhibit 1.  
 13 (Whereupon, Turcone Exhibit No. 1 was  
 14 marked.)  
 15 BY MS. GARYPIE:  
 16 Q. I'm going to hand you what has been marked  
 17 Exhibit 1 and is a map labeled 1965 and I'm going  
 18 to ask you to take a look at that and let me know  
 19 when you're finished.  
 20 A. Okay.  
 21 Q. Do you recognize what's depicted on that map?  
 22 A. Yeah. Yes, I do.  
 23 Q. What is that?  
 24 A. Let's see -- this was the main building  
 25 here. I think the front offices were up in front.

1 Q. Okay. How about the other names that you  
 2 mentioned, were they all laborers like yourself or  
 3 did they do other things?  
 4 A. I think George was the chemist.  
 5 Basically the rest of them were just laborers.  
 6 Some of them were like the mechanics or the  
 7 machinists or --  
 8 Q. And that -- does that include Jay, the  
 9 owner's son?  
 10 A. No. He was in the front office too.  
 11 Q. Do you know what his job duties were?  
 12 A. No.  
 13 Q. Who directed the disposal of the waste from  
 14 the manufacture of the powdered compound?  
 15 A. I honestly don't know. You mean someone  
 16 said -- I don't know.  
 17 Q. How about the waste from the manufacture of  
 18 the weed killer? Who supervised that disposal?  
 19 A. No one really supervised it. They said  
 20 this is what you do with it and do it but I don't  
 21 know exactly told who to do it, I don't know. I  
 22 don't remember really.  
 23 Q. Were any records kept of the amount  
 24 manufactured or the amount of raw materials used,  
 25 that type of thing?

1 Q. Okay. I'm going to give you a blue pen --  
 2 A. Uh-hum.  
 3 Q. -- and I'm going to ask you to mark the front  
 4 offices with the number "1". And the other area  
 5 you mentioned was manufacturing, is that right?  
 6 A. Yes.  
 7 Q. And where is that, if you can mark that with  
 8 a number "2"?  
 9 A. That would be all this area here.  
 10 Q. You want to draw a circle around that,  
 11 please?  
 12 A. (Witness complying.) The lab was up in  
 13 here, "3", and the drier was in this area here.  
 14 Q. If you could mark the drier with the number  
 15 "4".  
 16 A. This was the building that I worked in  
 17 out here.  
 18 Q. And the building that you're pointing to,  
 19 what was produced in that building?  
 20 A. That was where the weed killer was  
 21 produced.  
 22 Q. Can you put a circle around that and number  
 23 that "5"?  
 24 A. (Witness complying.)  
 25 Q. Great. Are there any other Metro-Atlantic

1 facilities that you recognize on this map?  
 2 A. This was like the machinists' shed in  
 3 here. This is where they kept all their -- the --  
 4 the motors and piping and -- and the office for  
 5 that mechanic, he was in this building here.  
 6 Q. Okay. If you could circle that and mark that  
 7 "6".  
 8 A. And the boilers were over here.  
 9 Q. And circle that and mark that "7".  
 10 A. (Witness complying.)  
 11 Q. You mentioned that Bernie generally worked in  
 12 the front office. Did you ever see him in any  
 13 other part of the Metro-Atlantic facility?  
 14 A. Not really.  
 15 Q. Only in the front office?  
 16 A. Right.  
 17 Q. How about Jay Buonanno?  
 18 A. They would once in a while would walk  
 19 through. That would be about it.  
 20 Q. Where were the Dumpsters located where the  
 21 waste material from the powdered compound --  
 22 A. Right about here.  
 23 Q. If you can put an "X" there and put an "8"  
 24 next to it.  
 25 A. (Witness complying.)

1 Q. At this point, I'd like to turn to the New  
 2 England Container Company. Did you also work  
 3 there?  
 4 A. I used to work there on a part-time  
 5 basis at night.  
 6 Q. What year was that?  
 7 A. Sometime within that same time frame.  
 8 Q. That was August of '63 to January '65?  
 9 A. Yes. But that was randomly.  
 10 Q. If you worked a night, how many hours would  
 11 you work?  
 12 A. I'm going to say three because it was  
 13 generally in the summer with daylight-savings  
 14 time.  
 15 Q. About how often each month would you work  
 16 there?  
 17 A. Maybe twice.  
 18 Q. What were your duties there?  
 19 A. I used to burn drums.  
 20 Q. What was the process for burning the drums?  
 21 A. You'd have this long conveyor that went  
 22 through an oven, a gas-fired oven and you would  
 23 tip the drum upside down on the conveyor and put  
 24 the lid on it and it would just go through the  
 25 oven and burn whatever paint or whatever residue

1 was in the drum out.  
 2 Q. Where did you get the -- the drums that you  
 3 put on this conveyor?  
 4 A. They were stockpiled outside.  
 5 Q. When you retrieved the drums to place them on  
 6 the conveyor, would -- how much residue would they  
 7 contain?  
 8 A. They could contain anything from  
 9 something to about a quarter full.  
 10 Q. What size drums were they?  
 11 A. Fifty-five gallon.  
 12 Q. And after they went through the furnace,  
 13 where would they go?  
 14 A. I'm going to say they were stacked  
 15 inside the building.  
 16 Q. Were you able to -- strike that. Were all  
 17 the drums that came out of the furnace stacked  
 18 inside the building?  
 19 A. To the best of my recollection, yes.  
 20 Q. And were there ever drums that you or anyone  
 21 else retrieved from the stockpile that were not  
 22 placed on the conveyor?  
 23 A. No.  
 24 Q. So they would always go from the stockpile to  
 25 the conveyor, to the stack in the building?

1 A. Right. If that's the process we were  
 2 in, yes.  
 3 Q. And were there any other processes that were  
 4 done at that facility?  
 5 THE WITNESS: That I was involved in?  
 6 MS. GARYPIE: Right.  
 7 A. Yeah. Sometimes we would take a sealed  
 8 drum and we would run it through a machine. It  
 9 was like a giant can opener. It would cut the top  
 10 off.  
 11 Q. And then what?  
 12 A. Then it was piled outside the burner and  
 13 they were burned.  
 14 Q. Was there anything inside of the sealed drum?  
 15 A. I'm going to say no.  
 16 Q. Were there any other processes?  
 17 A. There were other processes but I wasn't  
 18 involved in them.  
 19 Q. Were there any other processes that you  
 20 observed?  
 21 A. I can tell you what they did with them.  
 22 I don't -- you know, after they came out of the --  
 23 the burner, they were stockpiled and after that,  
 24 the next process was sandblasting.  
 25 Q. Okay. What happened after the sandblasting?

1 A. I believe they were painted inside and  
 2 out.  
 3 Q. And, then, what happened?  
 4 A. Then they were checked to see if they  
 5 would leak.  
 6 Q. And then what?  
 7 A. Then they were piled up and sold or  
 8 shipped or whatever they did with them.  
 9 Q. How did the drums get to the stockpile?  
 10 A. I think they used to buy them from  
 11 different people who sold them to them.  
 12 Q. Do you know who they used to buy them from?  
 13 A. Offhand, no.  
 14 Q. Were there labels on any of the drums?  
 15 A. There probably was.  
 16 Q. What did those labels say?  
 17 A. I really didn't pay attention to them.  
 18 I really don't know.  
 19 Q. Do you know if they were from Rhode Island?  
 20 A. I have no idea. They could be from  
 21 anywhere.  
 22 Q. Were they brought to the facility by truck?  
 23 A. I'd say so, yes.  
 24 Q. Who was driving the trucks?  
 25 A. I have no idea.

1 Q. So some spilled on the ground; some went into  
 2 the oven?  
 3 A. The oven.  
 4 Q. And when you say the ground, was that inside  
 5 the building or outside the building?  
 6 A. No, it was outside. All this was  
 7 outside.  
 8 Q. Oh, so there was no building?  
 9 A. No. There was like -- might have  
 10 been -- I'm trying to remember -- I think there  
 11 might have been a canopy over where we stood, you  
 12 know, to keep you out of the inclement weather but  
 13 it was not inside a building.  
 14 Q. Okay. You mentioned that you might work a  
 15 three-hour shift in an evening. How many drums  
 16 would go through that process in the three-hour  
 17 shift?  
 18 A. Right now I couldn't venture a guess.  
 19 Q. Fair enough. Would it be more than a  
 20 thousand?  
 21 A. Oh, no.  
 22 Q. More than a hundred?  
 23 A. I don't think so. It wasn't that fast.  
 24 Q. When the drums were in the furnace, would  
 25 they ever react to the heat or how would they

1 Q. Were they -- were any New England Container  
 2 employees driving the trucks?  
 3 A. I would assume so, some of them but, you  
 4 know --  
 5 Q. You yourself didn't drive the truck?  
 6 A. No, no, because you have to realize this  
 7 was a part-time job for me.  
 8 Q. Right.  
 9 A. I would work after the fact, so all the  
 10 regular employees would be gone.  
 11 Q. How many regular employees would they have  
 12 during the day?  
 13 A. I have -- I have no idea.  
 14 Q. More than would be working at night?  
 15 A. Oh, yeah. There were -- at night there  
 16 was maybe three of us at the most.  
 17 Q. And when the -- you mentioned that the drum  
 18 would get tipped upside down onto the conveyor?  
 19 A. Uh-hum.  
 20 Q. And if there were residual materials in the  
 21 drum, where would those materials go?  
 22 A. They would like fall in the track of the  
 23 conveyor and would be brought into the oven with  
 24 it. What wasn't, it would just stay on the  
 25 ground.

1 react to the heat?  
 2 A. Some might flare up. That was about it.  
 3 They would just burn. I mean all it did was,  
 4 like, burn all the paint and the residue whatever  
 5 on the inside and the outside.  
 6 Q. And do you recall -- were there different  
 7 types of residues in the drums or did it all look  
 8 the same?  
 9 A. They all looked the same. I mean it  
 10 looked like ash. Some was light gray; some was  
 11 dark gray but --  
 12 Q. Was it solid or liquid?  
 13 A. No, it would all be a powder. It's ash.  
 14 Because they were tipped upside down --  
 15 Q. Okay.  
 16 A. -- when you put them on the belt. You  
 17 put them upside down and you put the cover on top.  
 18 Q. So ash would fall out of the drum?  
 19 A. Right onto the conveyor.  
 20 Q. Onto to the conveyor. What color was the  
 21 ash?  
 22 A. Various shades of gray.  
 23 Q. Who supervised you when you were working at  
 24 New England Container?  
 25 A. I used to work with a guy named Murphy.

1 Believe it or not, I can't remember his first  
 2 name.  
 3 Q. And what were the names of your coworkers  
 4 there?  
 5 A. Once in a while someone else would come  
 6 in and help and that was about it.  
 7 Q. Did you receive any type of training when you  
 8 started working there?  
 9 A. Not really. Here's a belt; here's a  
 10 drum; tip it upside down and push it through.  
 11 That's it.  
 12 Q. I'm going to direct your attention to  
 13 Exhibit 1 again.  
 14 A. Yes.  
 15 Q. And can you point out where the New England  
 16 Container operated on this map?  
 17 A. I'm going to say it's in this building,  
 18 in this facility here.  
 19 Q. Can you put a circle around that? And we are  
 20 up to "9".  
 21 A. Yeah. That was "8".  
 22 Q. Were there any written records of the  
 23 production at New England Container?  
 24 A. I have no idea.  
 25 Q. How did the two companies interact?

1 A. In the process of making it, yeah.  
 2 Q. -- do you recall any other fires at the site?  
 3 A. No.  
 4 Q. Was there an odor associated with either  
 5 facility?  
 6 A. Well, with the container company we used  
 7 to burn them; they used to stink.  
 8 Q. Is there any -- any association you can give  
 9 me with the smell? For instance, sulfuric or --  
 10 A. No, not sulfuric. It was -- sometimes  
 11 depending on what was in the barrel, it would just  
 12 be foul, you know. It wasn't perfume, if that's  
 13 what you mean.  
 14 Q. Was there flooding at the -- at either  
 15 facility during the time you worked there?  
 16 A. I think once but I'm not sure. I think  
 17 it was during the winter. The river backed up.  
 18 Q. Did you see any wildlife in the facility or  
 19 around the facility?  
 20 A. A few cats.  
 21 Q. Did you see any neighborhood kids ever in the  
 22 facility or around the facility?  
 23 A. No, not really.  
 24 Q. Did the Woonasquatucket River ever change  
 25 color during the time you worked at either -- at

1 A. Well, I know that Bernie owned New  
 2 England Container and they used to buy barrels --  
 3 Metro-Atlantic would buy barrels from them.  
 4 That's about all I know about that.  
 5 Q. And did Bernie have any connection to New  
 6 England Container?  
 7 A. He owned it.  
 8 Q. So he owned both New England Container and  
 9 Metro-Atlantic?  
 10 A. I don't know if he really owned  
 11 Metro-Atlantic. I think it was more his brother  
 12 and he was, like, whatever you want to call him,  
 13 superintendent or what not. I never really  
 14 understood that relationship but I was told that  
 15 he owned New England Container.  
 16 Q. And what was his brother's name?  
 17 A. Joseph. I don't even know if they are  
 18 still living.  
 19 Q. Other than the spill of the drum residue over  
 20 by the conveyor belt, do you recall any other  
 21 spills at either Metro-Atlantic or New England  
 22 Container?  
 23 A. Not while I was there.  
 24 Q. And other than the fire that you mentioned  
 25 associated with that powder compound --

1 the facility?  
 2 A. No.  
 3 Q. Did you ever see drums floating in the river  
 4 at the time you worked there?  
 5 A. No.  
 6 Q. I'm going to -- let's see -- were you aware  
 7 of any complaints about operations at either  
 8 Metro-Atlantic or New England Container?  
 9 A. No, not really because it isn't like it  
 10 is here today.  
 11 Q. What do you mean?  
 12 A. It was an old mill and you had the mill  
 13 on the side. I mean there were no -- there was  
 14 really no one around you. There was a lumberyard  
 15 on the other side of the river and train tracks  
 16 and --  
 17 Q. So it was not residential?  
 18 A. No.  
 19 Q. Did you have any health effects from working  
 20 at either Metro-Atlantic or New England Container?  
 21 A. Not that I'm aware of.  
 22 Q. Have you ever suffered from acne as an adult?  
 23 A. No, I'm going to say no, no more than  
 24 usual I guess.  
 25 Q. I'm going to direct your attention back to

Page 37

1 Exhibit 1 --  
 2 A. Yes.  
 3 Q. -- and ask you if you take a look at  
 4 Exhibit 1 where you've marked Area 9 --  
 5 A. Yes.  
 6 Q. -- do you recall any activity south of that  
 7 area?  
 8 A. Offhand, no. To be honest with you, I  
 9 never went back there. I never had reason to.  
 10 Q. Was there a fence back there?  
 11 A. I honestly don't know.  
 12 Q. Were any drums ever buried in the area of --  
 13 of the facility, in the facility or near the  
 14 facility?  
 15 A. Not that I know of.  
 16 Q. Did you ever observe any standing pools of  
 17 liquid at the facility?  
 18 A. No.  
 19 Q. Did you ever observe any haze at the  
 20 facility?  
 21 A. No.  
 22 MS. GARYPIE: I think we are almost  
 23 done. I'm going to take a minute.  
 24 ( P A U S E )  
 25 BY MS. GARYPIE:

Page 38

1 Q. I have just a few more questions. Do you  
 2 know anything about operations at the facility  
 3 either before or after you worked there?  
 4 A. No. Once I left, I left.  
 5 Q. Have you ever heard the name Crown Metro  
 6 associated with the facility?  
 7 A. No.  
 8 Q. Have you ever heard the name Emhardt,  
 9 E-M-H-A-R-D-T, associated with the facility?  
 10 A. No.  
 11 Q. Were you aware of any Metro-Atlantic  
 12 operations in New Jersey?  
 13 A. No.  
 14 Q. Was formaldehyde ever used at Metro-Atlantic?  
 15 A. Yes.  
 16 Q. How was that used?  
 17 A. I think it was used in the rain  
 18 repellent. Also I think it was used in the yellow  
 19 powder as an ingredient. You knew when you were  
 20 around that.  
 21 Q. That's the powdered compound?  
 22 A. Yeah.  
 23 Q. And you said you knew when you were around  
 24 formaldehyde?  
 25 A. Oh, yeah.

Page 39

1 Q. How is that?  
 2 A. You could smell it.  
 3 Q. Was trichlorophenol ever used by  
 4 Metro-Atlantic?  
 5 A. I honestly can't say. I don't know.  
 6 Q. Or TCP?  
 7 A. No. I can remember names on labels and  
 8 seeing them and they were that long.  
 9 Q. When you say, "that long," how long?  
 10 A. About a foot. Well, to me it seemed  
 11 like a long name. It wasn't like a simple  
 12 seven-letter word; it was like chloro-something,  
 13 something, something, something, amine, you know.  
 14 Q. Were there also numbers associated with those  
 15 long words?  
 16 A. I'm trying to remember if they gave the  
 17 chemical. What did they call it -- like CO<sub>2</sub>,  
 18 carbon dioxide, but sometimes they would give you  
 19 the chemical name of it in letters like carbon  
 20 tetra, something like that. It would be like C  
 21 something. They would have oxygen and other  
 22 compounds in it.  
 23 Q. I'm going to direct your attention to the  
 24 first time we spoke back in late October.  
 25 A. Yes.

Page 40

1 Q. Do you recall telling me at that time that  
 2 there was a dump south of the drum recycler?  
 3 A. Dump? They used to stockpile a lot of  
 4 whole barrels there. That's what I meant by a  
 5 dump. Not that they would just, you know, dump  
 6 junk there. It was like old barrels and, I guess,  
 7 they cleaned it up after a while.  
 8 Q. And when the -- who was placing the drums  
 9 back there?  
 10 A. I'm assuming it would be New England  
 11 Container because they were their drums.  
 12 Q. And was that part of the stockpile that was  
 13 at the facility before the drums would go into the  
 14 furnace or was this a different type of drum?  
 15 A. That was some of those. There were some  
 16 drums that they couldn't reuse. They were just  
 17 junk and they would just pile them out there.  
 18 Q. Why couldn't they reuse them?  
 19 A. Because they wouldn't hold liquids.  
 20 Q. So --  
 21 A. They were too porous because when they  
 22 sandblasted, sometimes the metal would be too  
 23 thin.  
 24 Q. And was there anything else that was placed  
 25 in that area south of the drum recycler?

1 A. I honestly don't know. I mean they used  
 2 to store stuff there, too, like trailers and  
 3 whatnot. It was also like a big parking area.  
 4 MS. GARYPIE: I'm going to mark this  
 5 Exhibit 2.  
 6 (Whereupon, Turcone Exhibit No. 2 was  
 7 marked.)  
 8 BY MS. GARYPIE:  
 9 Q. I'm going to -- to ask you to take a look at  
 10 Exhibit 2. It's a couple of pages, so take your  
 11 time and let me know when you're done.  
 12 A. It looks like a trailer truck with  
 13 Metro-Atlantic on it.  
 14 Q. Do you recognize anything in those photos on  
 15 Exhibit 2?  
 16 A. That says they were in Fairlawn, New  
 17 Jersey. No.  
 18 Q. So you don't recall seeing this type of  
 19 trailer when you worked at the facility?  
 20 A. No. The only trailers that used to come  
 21 in that said that, came out of South Carolina.  
 22 All the trucks we had there were just straight  
 23 trucks, straight body.  
 24 Q. So there was no lettering on the trucks that  
 25 were used here?

1 because when I was working here, I was 18 years  
 2 old. I'm 55 now.  
 3 Q. Were the other workers --  
 4 A. Much older than I was.  
 5 Q. They were?  
 6 A. Yeah. They were in their -- I'd say in  
 7 their thirties and forties and -- and older. I'm  
 8 not saying they couldn't be living but --  
 9 Q. Were there any women that worked at the  
 10 facility?  
 11 A. Just in the front office I believe.  
 12 Q. Do you recall any female chemists?  
 13 A. No. The only one I knew was George.  
 14 MS. GARYPIE: Okay. I think we are  
 15 done. Thank you very much for your time.  
 16 (Adjourned at 4:29 p.m.)  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 A. Yeah, there was, but they weren't  
 2 trailer trucks. Like it was -- they had a tanker  
 3 but not that -- that box.  
 4 Q. Okay. And was it the same logo that appeared  
 5 on the --  
 6 A. It looks like it.  
 7 Q. Is there anything else that I haven't asked  
 8 about that you think might be helpful as we try to  
 9 figure out what happened at the site here?  
 10 A. Offhand, I wish I could remember more of  
 11 the names of the chemicals that were used but I  
 12 can't and the -- that -- that -- the information  
 13 you sent me, none of those even sounded familiar.  
 14 Q. And when you say that the information that I  
 15 sent you, are you referring to the November 8th  
 16 letter that was sent to you regarding --  
 17 A. Uh-hum.  
 18 Q. -- health information?  
 19 A. Yes.  
 20 Q. Is there anyone else that you can think of  
 21 that might have information that I could talk to  
 22 about what happened at the site, operations,  
 23 things like that?  
 24 A. To be honest with you, I would be very  
 25 much surprised if a lot of them were still living

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