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Catherine Carypie, Esq. 8-1540

Affidavit

I, Stephen A. Capron, do hereby state & depose:

1. I grew up in the area south of the Metro-Atlantic Chemical Company in North Providence, R.I. from approximately 1960 until 1970, I would see green and blue colored liquids, with a chemical smell, emptying from the outflow pipes of the Metro-Atlantic Chemical Co. These pipes emptied these liquids directly into the Woonasquatucket River. I witnessed these outflow of liquids, when I was crossing the Johnston - North Providence Bridge on a weekly basis during the aforementioned years.

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 25th day of October, 2000.

Witnessed by

Stephen A. Capron

Stephen A. Capron

Affidavit

I, Anthony Caputo, do hereby state and depose:

1. I was the Chief Surveyor for Waterman Engineering which surveyed the Brook Village property, prior to construction of the building in 1976.

2. I was at the property for one day and recall seeing old ruins from a mill building, concrete slabs, and an area of asphalt in the front section of the property. There was a 24 inch storm drain in the north west corner of the property.

3. In the marsh area located at the lower end of the property, I saw approximately 7 or 8 barrels scattered on the ground. The marsh water was rusty in color and I told one of the road men not to stop in it. The entire area was, in general, dirty.

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 27th day of October, 2000.

Martin J. Cole
WITNESSED BY

Anthony A. Caputo
Anthony A. Caputo

Affidavit

I, Dario Carbone, do hereby state and depose:

1. I lived at 41 Steere Ave, Centerdale, R.I., , which is adjacent to the Centerdale Restoration site, from 1977 until 1980. During that time, I would hear a large amount of barrels popping during the night and on warm days I would see smoke rising from the ground in that area.

2. When walking through this area, I saw partially exposed rusted barrels and chunks of a dark blue rubber-like material on the ground. The smoke, which I saw rising from the ground, was deep blue or green in color and the ground around it had the rainbow look of gasoline on it.

3. My late father was employed by Metro-Atlantic and on Saturdays he worked for New England Containing. In approximately 1963, I went with my father who drove a trailer truck load of chemicals to Canada, some of which were acids and acetone. The acid leaked from a barrel and burned a hole in my father's shoe and small toe.

4. At the New England Container company, there was a dirt road which led from the barrel company to a dump on the lower end of the property. Barrels with holes in them or non-reusable barrels were sent to this dump for disposal. This dump was only used by New England Container and was not a public landfill.

5. At New England Container, incoming barrels were washed and the waste water was dumped onto the ground.

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 26th day of October, 2000.

Mary Blake
WITNESSED BY

David Carbone
DAVID CARBONE

Affidavit

I, Raymond Nadeau, do hereby state and depose:

1. I was employed by New England Container, from 1956 until 1969, as a laborer and a truck driver.

2. From 1956 until 1962, I worked in various jobs at the Centerdale plant. Barrels came to the plant from Massachusetts, Rhode Island, and Connecticut. They were brought to the facility on New England Container trucks and also purchased from various barrel dealers. These barrels usually contained some type of chemical residues. Barrels also came from the Metro-Atlantic plant. Some of these barrels were filled with a black sludge, which came from the Metro-Atlantic presses. The sludge was taken to the landfill, located below the New England Container plant, and dumped and then the barrels were reconditioned.

3. At the plant, the incoming barrels were unloaded from the trucks in amounts of up to 200 barrels per truck. They were then stacked on the ground. If the barrels were open tops, they were stacked in an upright position. If they had covers on them, they

were stacked on their sides, in rows of 50 feet and 5 barrels high in a pyramid configuration. There were spills and leaks onto the ground from the barrels.

4. The initial step in the reconditioning process was to burn the barrels clean in the gas fired furnace, which contained 5 or 6 burners. The barrels were brought to a conveyor, which led into the burner. If there was a flammable liquid in the barrel, a match was thrown into the barrel to ignite the liquid and burn it off, so that it did not explode in the burner. Some of these barrels came from a lacquer facility in Exeter, R.I., which made paints. The barrels were placed upside down on the conveyor belt and any remaining liquid or sludge drained into a cement pit underneath the conveyor. The barrels were then burned clean.

5. When the sludge pit was full, the contents, which were a mixture of all types of chemicals including formaldehyde, was shoveled into barrels, which were taken to the landfill below the plant and emptied. Approximately two 55 gallon barrels of sludge were dumped

R.N.

onto the ground of the landfill each week.

6. Ash, from the material burned from the barrels in the furnace, was swept onto the ground adjacent to the burners or sometimes placed into barrels, which were emptied at the plant landfill.

7. After the barrels were burned clean, the dents were rolled out of the barrels and they were sand blasted and water tested for leaks. The dust residue from the sandblasting operation was also disposed at the plant landfill.

8. If the barrels did not pass the leak test, they were sold to the Parks Department of Warwick, R.I. If they passed, they were coated with a Teflon lining and the outside of the barrel was spray painted. The barrels were then baked in an oven and stacked for shipment to the customer.

9. The barrels were spray painted different colors, depending on the customer's request. Paint, MEK, Toluene, and mineral spirits were used in this operation. Approximately 3 gallon cans, with a mixture of these chemicals in them, were disposed of on a weekly

basis at the plant landfill.

10. From 1962 until 1969, I worked as a truck driver, who drove a straight body truck, which held up to 150 barrels. I delivered clean barrels and returned barrels to New England Container, for which New England Container paid, from the following companies:

1. U.S. Oil - An oil distributor, from which I would obtain 150
E. Providence, R.I. barrels, some with oil residue, per week.

2. Bradford Soap Works - I would obtain 50 to 75 barrels with residues,
Warwick, R.I. every 2 weeks.

3. Warwick Chemical - I would obtain 150 barrels, between once and
Warwick, R.I. twice a week. The barrels would contain up to 2 inches of liquid chemicals.

4. Eastern Chemical - On a weekly basis, I would obtain 20 to 30 barrels
N. Providence, R.I. with chemical residues in them.

5. Crown Packing - This company made pie and cookies. The waste in the
Pawtucket, R.I. barrels was lard.

6. Crown Chemical - Every 2 weeks, I would obtain 75 barrels, which
Providence, R.I. contained chemical residues.

7. Hoechst Chemical - Once or twice a week, I would obtain 150
Attic, R.I. (off Rt. 117) barrels which contained dye powder residues, which turned my clothes various colors and also ate holes in them.

8. T.H. Baylis Chemical - Every 2 weeks, I would obtain 30 to 40 barrels
Warwick, R.I. with chemical liquids, including mineral spirits, in them. This company's truck drivers also sold barrels to New England Container, which came from Baylis' customers.

9. Organic Chemical - On a monthly basis, I would obtain 10 to 12
RT. 44 barrels, with chemical residues in them.
Providence, R.I.

10. Dy Tex Chemical - On a monthly basis, I would obtain 30
School St. barrels with liquid soap and cleaner fluid
Pawtucket, R.I. residues in them.

11. Thompson Chemical - R.N. On a
Attleboro, Ma monthly basis, I would obtain 150 barrels, some with chemical residues in them.

12. Tekador Apex - On a monthly basis, I would obtain 150 barrels
York Ave. with clean motor oil residues in them. We used
Pawtucket, R.I this oil in the company trucks or in our personal vehicles.

13. Duoset - Every 3 to 4 months, I would obtain 150
Rockville, CT (off RT. 44) barrels with chemical residues in them.

14. 6550 Oil - On a monthly basis, I would obtain 50 to 60
E. Providence, R.I. barrels with oil residues in them

15. Webster Textile - Every 3 to 4 months, I would obtain 15 to 20
Graystone, R.I. barrels with dye and alcohol residues in them.

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

17. Otis Air Base - Falmouth, Ma — In the 1960's on one occasion, I got fifty-five gallon barrels with turbine oil residues in them.

18. Quonset Naval Base - Warwick, R.I. — In the 1960's on one occasion, I got fifty-five gallon barrels with turbine oil residues in them.

R.N. [redacted]

19. George Mann - Providence, R.I. — On a monthly basis, I would obtain 40 to 50 barrels with Toluene, Naptha, MEK, and ammonia residues in them.

11. There were additional companies, whose name I can't recall, from which I obtained barrels and delivered them to New England Container. Dirty barrels were purchased from Raymond Barrel and Farrel Barrel for cleaning and reconditioning.

12. Besides New England Container's trucks, other barrel dealers brought and sold barrels to the company for reconditioning. These barrel dealers would buy or obtain barrels from various companies in Rhode Island, Massachusetts and Connecticut and then sell them to New England Container. These barrels usually contained some type of waste material in them. Some of these barrel dealers were Mathews Barrel, Fall River, Ma, Efros Barrel, Providence, R.I. and Woburn Barrel, Woburn, Ma. Efros Barrel brought 50 to 60 barrels to New

England Containers, usually 2 to 3 times per week and Woburn Barrel would sell approximately 150 barrels, every 2 to 3 months, to New England Containers. Some of These barrels contained a mixture of liquid and chemical sludges. New England Containers also sold blasted barrels for Farrell Barrel, but these barrels had already been burned clean, before they arrived at the plant.

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 27th day of October, 2000.

Marilyn J Blake
witnessed by

Raymond Nadeau
Raymond NADEAU

Affidavit

I, Edmund Izzo, do hereby state and depose:

1. I was employed by New England Container, from 1959 until 1969, as a laborer at various jobs, throughout the facility. Barrels came from Rhode Island and Massachusetts to the plant, but I do not know from what companies the barrels came.

2. Barrels, which were 1/4 to 1/2 full with liquids and sludges, were taken to the landfill below the plant and emptied. Approximately 4 to 5 barrels were taken to be emptied each month. The material dumped onto the ground was left there and never burned. The dump area was also used for the disposal of barrels, which could not be reconditioned.

3. The barrel furnace was located outside of the buildings and had no roof. The barrels were placed upside down and open onto the furnace conveyor and anything in the barrels drained onto the ground including paint thinners, lacquers, paints, formaldehyde, and other chemicals. This material was shoveled into a pile, adjacent to the barrel furnace. The

pile was a sludge of various colors, including yellow, green, and red. When so much sludge had been accumulated, it was shoveled into barrels and taken to the plant landfill and dumped onto the ground.

This is a true and accurate statement to the best of my knowledge, information, and belief. Signed under the pain and penalty of perjury this 26th day of October, 2000.

Martin J. Blake
Witnessed By

Edmund W. Izzo
Edmund W. Izzo