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March 10, 2003

Via Federal Express

Ms. Eve Vaudo
Senior Enforcement Counsel
Environmental Protection Agency
1 Congress St., Suite 1100
Boston, MA 02114-2023

Re: December 11, 2001 Raymond Nadeau Interview Memorandum

Dear Eve:

Pursuant to your request, I have enclosed a copy of the above referenced interview memorandum on behalf of the Centredale Manor Performing Parties Group ("Group").

The interview memorandum is referenced in the January 27, 2003 letter to you from Warren Anthony Fitch. The Group appreciates the work being done by EPA in reviewing the prior submittals.

Please contact me with any questions.

Very truly yours,



Stuart R. Deans



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INTERVIEW OF RAYMOND NADEAU

Raymond Nadeau, [REDACTED] was interviewed on December 11, 2001. Nadeau advised that he began working at the New England Container Corporation, Centredale, RI in 1955. He worked mainly in the plant reconditioning the steel drums for the first seven years. During the next seven years, he was mainly a driver for the company, although he still worked in the plant a part to the time. He was hired by Bernie Buonanno, Sr., who owned and managed the barrel shop (NECC). When Raymond was hired, Bernie had his office in the chemical company, Metro Atlantic. At the time that Nadeau began working at NECC, Bernie was working full time in North Providence. He may also have been assisting in the operation of the chemical plant, as well as managing the barrel company. When the chemical company moved from North Providence to Dudley Street, Providence, Bernie made an office in NECC. The office was for himself and a secretary. When Nadeau began his employment at NECC in 1955, there were five employees. The main function of NECC was to clean, refinish and sell old drums.

Raymond Nadeau had three brothers who worked for the Nadeaus. Joseph Nadeau worked as a laborer in the chemical plant. Joseph resides at [REDACTED]. A brother Paul Nadeau worked in the barrel company. Paul is presently living in [REDACTED]. Robert Nadeau was employed as a batch maker in the chemical plant. Robert is deceased.

The foreman in NECC was John McKooskie (phonetic). McKooskie acted as the foreman and ran the barrel company for Bernie. McKooskie lived on [REDACTED].

At the barrel company, the open or empty drums were laid out horizontally five high. The full or upright drums were stacked in an upright position two high. Nadeau recalled that one year the river flooded and about 2,000 barrels were swept down stream and lost. The flood caused the water to be two feet high in the NECC plant. Nadeau said that NECC retrieved their barrels down to the point at the lower end of their property. They let the rest of the barrels go downstream.

The Fire Department was often called to NECC about once a week to put out various fires. The fires were usually caused by the burning off of residues. The fire department would usually be able to put out the fire quickly. The fire engines would respond either from the Mineral Spring Avenue station or from the Lymanville station.

Nadeau estimated that 85%-90% of the chemicals that were dumped at the site, came from the chemical company. The chemical company would dump sludge at the point where the two rivers came together. They began by dumping it at the end of the point and they worked their way back. The point became a mess with sludge, fiber barrels, plastic bags, and rubber gaskets. Often the barrel workers would borrow a truck

from the chemical company and use the truck to dump their waste off of the back end. He also recalled that on a couple of occasions, the chemical company had a bulldozer go down to the point and push the waste into the river. The bulldozer was owned by a construction company that rented space at NECC. The space rented was located between the chemical company and NECC.

Whenever it snowed, Bernie Buonanno would have the barrel company employees shovel out the truck lanes, rather than pay an outside plow to come in and remove the snow. The snow had to be shoveled to allow the trucks in and out of the barrel company. The NECC building had previously been an old horse stable.

Nadeau also recalled that one evening, Angelo Carbone, his brother-in-law and an employee of the chemical plant, opened the wrong valve on one of the vats. About 1,000 gallons of a chemical poured into the river from the spill. Carbone, who was married to the sister of Raymond Nadeau's wife, is now deceased.

On another occasion, a tank at the chemical company blew up and shook the entire area. The company had to repaint several houses along Woonasquatucket Avenue because of the explosion.

According to Nadeau, some of the barrels that were brought back from other companies, were full of sludge. The chemical workers would then dump the sludge out of the barrels at the point on the lower end of the Buonanno property. Most every day the NECC workers would have to clean out the pit beneath the conveyor belt and the leakage and residue from the barrels would drain into the pit and fill it. The waste would then be dumped on the point downriver from where the barrel company and the chemical company buildings were located.

Nadeau said that after the chemical company relocated to Dudley Street, NECC moved to a location on Route 116 a short distance east of the National Guard complex. It is on the same (south) side of 116. The plant is managed by Joe's Buonanno's son, Vinnie Buonanno. Nadeau said that after he left his employment with NECC, he delivered a load of barrels to NECC from Mathews Barrel, Fall River, MA.

Nadeau recalled delivering and/or picking up barrels at the following companies while he was employed as a driver for NECC:

Otis Air Force Base, Cape Cod, MA:

Nadeau said he hauled approximately 2,700 barrels from the base to NECC during one short period of time. He said that they had been used to store turbine oil and were relatively clean. He estimated that there may have been about 15 gallons of oil total in the entire 2,700.

Quonset Point Naval Air Station:

A short time after he removed the barrels from Otis, he removed 2,400 barrels from Quonset. The barrels had been used to store turbine oil and were pretty well emptied out when NECC took possession of them.

Syntron Chemical:

Syntron was a small chemical company located off of route 122 (Mendon Road) in Ashton, RI. Syntron purchased clean barrels from NECC and returned dirty barrels. Nadeau does not know what type of chemicals Syntron produces.

Dytex Chemical:

Dytex was located on School Street, Pawtucket, RI. It was on the same side of the street as the Blackstone River. Nadeau recalled that Dytex made cleaners and soaps. He regularly delivered clean barrels to Dytex and picked up their dirty barrels.

Teknor Apex:

This company is located on York Avenue, Pawtucket, RI, near Central Avenue. At this location, Nadeau would regularly pick up dirty barrels, however NECC did not supply the company with clean barrels. He recalled that some of the barrels that were picked up at Teknor Apex had Sears and Roebuck motor oil in them and other barrels had a chemical that the company used in the manufacture of garden hose.

Hoechst Chemical:

Located in Artic, RI near the West Warwick/Coventry line on a dead end street off of route 117. Nadeau recalled that he would drop off 150 clean barrels and pick up 150 dirty barrels on a regularly basis. This company apparently manufactured and shipped dyes, as the dust from various dyes was in the steel drums when they were returned.

Original Bradford Soap Works:

Nadeau regularly dropped off and picked up barrels at this company. It was located in the village of Clyde, near the West Warwick/Coventry line. He recalled that Bradford put liquid soaps in the drums. The drums, when returned, were fairly clean.

Worster Textile:

Worster was located in Greystone (North Providence), RI off of Waterman Avenue. The company manufactured dyes. Empty steel drums (dirty) were picked up at this location.

Warwick Chemical, aka Sun Chemical:

This plant, one of which was likely a division of the other, was located in Washington County, RI in the general vicinity of Chariho High School. One or two times per month, NECC would deliver 150 clean drums and would pick up 150 dirty drums that appeared to have been used to store paste or chemicals.

Duoset Chemical:

Duoset was located in Rockville, CT. Each time that he went to this company, Nadeau picked up 150 barrels that had a chemical substance in them. Duoset did not receive clean barrels from NECC.

Crown Chemical:

This company was located in Providence, RI, next to Rhode Island Hospital. It was at the location on Dudley Street that Metro Atlantic moved to when it merged with Crown. NECC dropped off and picked up barrels at this location. The number of barrels always varied.

Metro Atlantic:

The plant in Centredale, RI was a regular customer of NECC. The Metro personnel drove to NECC to drop off their dirty barrels and to pick up the clean barrels.

Greenville Finishing:

A relatively small cloth finishing company located on route 44 in Greenville, RI. This company is no longer in business. NECC would pick up 50-100 barrels on a regular basis. Nadeau believed that the company made cloth and had a dye house. The barrels that were picked up appeared to have chemicals in them.

Woonsocket Color:

It is believed that this company made chemicals and/or dyes. It was located off of South Main Street in Woonsocket, RI. Nadeau recalled dropping off and picking up in the area of 30-50 barrels per month.

Brown and Sharpe Manufacturing Company:

Located at 200 Frenchtown Road, North Kingstown, RI, this company manufactures precision equipment. Nadeau stated that he would pick up 40-50 used drums about every six months. He did not deliver to this location. He drums that he picked up appeared to have had metal shavings in them and were fairly clean. He did not recall the used barrels having any sign of chemicals in them.

US Oil:

It is recalled that this company was in the section beneath the George Washington Bridge, in East Providence, RI. It may have been on Dexter Street. NECC delivered 150 clean barrels and picked up the same number about two times per month. This was a relatively small company that sold oil. The returned drums were fairly clean. Some of the drums, that were picked up, had come from a source other than US Oil.

ESSO Oil:

An oil company that was located next to US Oil on Dexter Street, East Providence, RI. NECC dropped off and delivered drums to this company. Oil had been in the drums that were picked up. The drums were relatively clean when they were taken back to NECC. About four to five gallons of oil would be drained for the total of 150 drums.

Organic Chemical:

This was also a small company that was located in East Providence in the same general area as US Oil above. NECC delivered and picked up in the area of 30-40 barrels per month at this location. The company was a chemical manufacturer. The returned barrels had little in them.

T. H. Baylis

This company is believed to have manufactured paint thinners and other similar products. It was located off Jefferson Boulevard, Warwick, near T. F. Green Airport. NECC delivered and picked up about 50 barrels two times a month at this location.

Raymond Barrel:

A barrel supplier that was located off Central Avenue, Pawtucket, RI. The company is presently out of business. This company dropped off the dirty barrels that they were unable to clean on their own. Nadeau never went to the company to pick up the barrels. The building that Raymond was in is no longer standing. When Raymond went out of business, many of their former customers began working with NECC.

Woburn Barrel:

A barrel supplier in Woburn, Massachusetts. This company also brought their barrels to NECC. They would bring 150 barrels to NECC once or twice per month. They were often quite dirty.

Eastern Color and Chemical Company:

This company is located on Livingston Street off of North Main Street, Providence (35 Livingston, Providence, RI, 02904, tel.401-331-9000). It is located in the area to the rear of the Branch Avenue fire station. NECC would drop off and then pick up 50-100 barrels per month. The barrels were not clean, but were not in bad condition.

Cranston Print Works:

This company originally had a plant near the Butcher Block and US Rubber Company plants off of Valley Street, Providence. NECC would drop off and pick up about 30 barrels per month.

George Mann Chemical Company

This company was originally on India Street, Providence and later moved to the Shipyard area off of Allen's Avenue. The shipyard location was in behind Brewster Lumber and beyond the Providence Public Works garage. Nadeau went to both locations. He would drop off and pick up about 150 barrels a month. The company is believed to still be in business.

Wilson Chemical:

This company is in the same building as the new location of the George Mann Company. Wilson was in the business of making bleach. Nadeau said that he would deliver and pick up about 50 new barrels a month. Nadeau said that the barrels that he picked up were dirty but had no heavy sludge.

Colfax Packing:

Located off of Smithfield Avenue, Providence, this company made pie and pastry fillings. Nadeau said that he would drop off and pick up about 100 barrels two times a month. The returned barrels were relatively clean and would not be heavy.

Cal Chemical:

Located in Clyde, RI, this company had two employees. It was located near to Hoechst Chemical. Nadeau estimated that he would pick up and drop off about 40 barrels per month. The returned barrels were fairly clean.

Valley Lace:

This company brought empty barrels to NECC a few times. The company was located in either the Phenix or Clyde sections of West Warwick.

Putnam Hertz:

This company was located in Putnam, CT. NECC did not deliver to this location, but only picked up barrels. Nadeau recalled going to this company on a couple of occasions. It is believed that the company is a cloth mill or dye house.

Gould Paper:

This company is located in Lions Falls, New York. Barrels were picked up at Gould on only on a few occasions. Nadeau said that he never went to this company, but the driver before him went there. Gould sold clean 30 gallon drums.

Efros Barrel:

This company was operated by Barney Efros and his brother Harry. It was located on Orms Street in the Randall Square section of Providence. Efros brought in 40-50 barrels per week. The barrels were quite dirty but did not have sludge.

Mathews Barrel:

Harold Mathews operated this Fall River, Massachusetts barrel company. At times Mathews would bring NECC 150 barrels a week. Mathews obtained a lot of his barrels from the Polaroid Corporation in Massachusetts, for a period of time. On one occasion, Mathews was charged with illegally dumping waste somewhere in Massachusetts.

Thompson Chemical:

Nadeau said that this company is located in Attleboro, Massachusetts. On one occasion there was a large explosion at the company. Generally Thompson delivered dirty barrels to NECC at a rate of 100 per month. On a few occasions, Nadeau picked up "clean" drums at this company.

RAYMOND NADEAU

Raymond Nadeau, [REDACTED] was interviewed on December 11, 2001.

Nadeau worked for the New England Container Corporation, Centredale, RI from 1955 to his voluntary termination in 1969. Nadeau recalled the below listed persons who worked for either Metro Atlantic Chemical or NECC in the period from 1955 to 1969:

Johnny Priest

A mechanic and a driver who originally operated an automobile garage across the street from the chemical company. He believes that Priest still lives in the area.

"Clutch" Labrie

A former driver who is now deceased.

John Palumbo

A driver for Metro Atlantic. He is retired and lives at [REDACTED]
[REDACTED]

Gerry Seracino

Seracino married Hug Bonino's daughter and worked at the chemical plant. He is believed to still be living.

Gerry Zeoli

A former driver for NECC and later an inside worker at the chemical company. Zeoli was also a former football coach in Johnston, RI. He is believed to be living in [REDACTED] at this time.

Larry Bello

A former chemist at Metro Atlantic. Bello resides in [REDACTED]

John Joyal

A former boxer and chemical company employee. Joyal is believed to be living in [REDACTED]

INTERVIEW OF RAYMOND NADEAU

On December 11, 2001, Raymond Nadeau was interviewed at [REDACTED]
[REDACTED] Nadeau is a former employee of New England Container Corporation, Centredale, RI. Nadeau was employed by NECC from 1955 to 1969. Nadeau believes that NECC and an adjacent chemical company, Metro Atlantic Chemical Company, caused hazardous waste to be dumped on the property. Both companies were owned by the Buonanno family.

In addition to the barrel company and the chemical company, Nadeau expressed the opinion that other companies located up the Woonasquatucket River may also have contributed to the pollution of the river and the soil bank in the area of Centredale.

Nadeau stated that he recalls that the following companies were located along the Woonasquatucket, up stream from Centredale:

Brown and Sharpe

Worster Textile

Esmond Mills

Esmond Blankets

Mine Safety Equipment

Evans Plating