

US EPA ARCHIVE DOCUMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 - NEW ENGLAND

Centredale Manor  
12.4  
9274

IN THE MATTER OF: ) ADMINISTRATIVE  
 ) DEPOSITION OF:  
 )  
CENTREDALE MANOR SUPERFUND ) KENNETH M. NERI, SR.  
SITE, NORTH PROVIDENCE, )  
RHODE ISLAND )

Deposition of KENNETH M. NERI, SR., a  
witness herein, taken on behalf of the EPA, on  
WEDNESDAY, JUNE 30, 1999, 1:20 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.

**ORIGINAL**

Vivian S. Dafoulas, RMR-CRR  
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**APPEARANCES**

FOR EPA:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
BY: CATHERINE GARYPIE, ESQUIRE  
ONE CONGRESS STREET, SUITE 1100 (SES)  
BOSTON, MA 02114-2023

ALSO PRESENT: MS. DONNA MURRAY

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KENNETH MICHAEL NERI 4

EXHIBITSPAGE

1 Site Map 10

2A through 2F - Photocopies of photographs 29

1                    KENNETH MICHAEL NERI, SR.,

2            called as a witness and having been first duly  
3                    sworn, testified as follows:

4                    EXAMINATION

5            BY MS. GARYPIE:

6            Q.     Mr. Neri, I am an attorney with the United  
7                    States Environmental Protection Agency. My name  
8                    is Catherine Garypie. I have with me Donna  
9                    Murray, who is an Enforcement Specialist, who will  
10                  be sitting in today, and the purpose of this sworn  
11                  statement or administrative deposition is to  
12                  investigate the Centredale Manor Superfund case  
13                  and this is not a hearing; it's not being taken  
14                  for adjudicatory purposes but it is being  
15                  performed pursuant to Section 122(e)(3)(B) of the  
16                  Comprehensive Environmental Response Compensation  
17                  and Liability Act, also known as CERCLA or  
18                  Superfund.

19                  The information that I'll be asking you today  
20                  relates to the volume and toxicity of waste at the  
21                  site and also to potentially responsible parties  
22                  at the site.

23                  I'm going to ask you a series of questions  
24                  and I'm going to ask you to respond out loud, so  
25                  the court reporter can get your answer and one

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1 thing that's important to remember is to, please,  
2 wait for me to finish my question before you  
3 answer. Sometimes I can take a little while to  
4 finish my question so bear with me.

5 If you need to take a break at any time, or  
6 if you'd like to get a glass of water, just let me  
7 know and I think we are ready to go.

8 **BY MS. GARYPIE:**

9 Q. The first question I need to ask you is  
10 whether you are represented by an attorney --

11 A. No, I'm not.

12 Q. -- in relation to the site?

13 A. No, I'm not.

14 Q. And where are you currently living?

15 A. At live at 64 Cody Drive in Gloucester,  
16 Rhode Island.

17 Q. What is your age?

18 A. Fifty-two.

19 Q. Have you lived in this area your entire life?

20 A. Most of my life from 19 -- actually  
21 started living here in 19 -- I believe it's '56.

22 Q. And so it's --

23 A. Till 1968. Then moved to North  
24 Providence from 1968 to 1989, but all my life has  
25 been in the Centredale area.

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1 Q. So from '89 to the present, you've been in  
2 Gloucester?

3 A. Correct.

4 Q. Are you currently employed?

5 A. Yes.

6 Q. And what is it that you do for a living?

7 A. Right now, I'm in sales. I'm employed  
8 by New York Carpet World in Warwick.

9 Q. And what position did you hold prior to your  
10 current position?

11 A. I owned Ken's Carpeting from 1969 to  
12 1995 I believe, and that was my own carpet store.

13 Q. And prior to 1969, were you employed?

14 A. Yes. I was employed by Donatelli's  
15 Carpet Service, 19 -- about 1968. Before that,  
16 you want to --

17 Q. Sure.

18 A. -- when I went to school? During when I  
19 was in high school and stuff, I -- I worked at  
20 Cherry & Webb in Providence and I worked at the  
21 gas station on top of the hill here, and I worked  
22 for Bennett Corsi's newspapers, which was across  
23 the street on Rhode Island Avenue, and before  
24 that, I was a paper boy.

25 Q. Did you ever serve in the military?

1           A.     I served in the military from March 6th,  
2     1998 till April 7th, 1998.

3     Q.     So a month?

4           A.     Yes.

5     Q.     And what branch in the military?

6           A.     Army.

7     Q.     At the time that you lived in Centredale, at  
8     what age did you -- did you leave the Centredale  
9     area?

10          A.     Actually, the Centredale area would be  
11     1989 because I -- I -- I lived -- from '56 to '68  
12     I lived on Amber Street, which is in Johnston on  
13     one side of the river, and from 1968 to 1989, I  
14     lived across the river right near Lee Romano's  
15     field, so I moved from one end of the river to the  
16     other end of the river.

17     Q.     So if I'm doing my math correctly, you moved  
18     to Amber Street when you were about eight years  
19     old?

20          A.     Eight or nine, yes. I was born in '47.

21     Q.     Okay. At the time that you lived on Amber  
22     Street, did you live close to the river or -- how  
23     close to the river did you live on Amber Street?

24          A.     I'm going to say about three  
25     hundred yards; three to four hundred yards.

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1 Q. And did you observe manufacturing operations  
2 across the river?

3 A. Correct.

4 Q. Okay.

5 A. From -- I went to Saint Lawrence  
6 School -- oh, boy, you're testing me really now --  
7 I'm going to say six years. Six years, yes.

8 Q. And is that --

9 A. That's on Woonasquatucket Avenue, which  
10 is, if you went right across here, you'd be right  
11 across the parking lot, the school is right about  
12 there.

13 Q. What type of activities did you see across  
14 the river?

15 A. We used to walk the railroad tracks when  
16 we used to get out of school and when we used to  
17 go to school, going out of school, when we'd walk  
18 in the tracks, there was, I believe, two pipes  
19 that went into -- right into the -- directly into  
20 the river from the -- I'm going to call it the  
21 Centredale side and I'll call the other side of  
22 the river the Johnston side.

23 There was two -- two pipes sticking out, I'm  
24 going to say, maybe about 50 feet from the bridge  
25 was the first one and maybe 100 or 200 yards

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1 further up there was another one that used to  
2 empty out fluids. I'm going to call it fluid,  
3 colored, yellow, red, blue, green, different  
4 colors of -- right into the -- looked like dye --  
5 into the river.

6 Q. And when you say, "bridge," do you mean the  
7 Smith Street bridge?

8 A. Yes. The one -- the bridge between  
9 the -- the Centredale -- I call it the Centredale  
10 bridge but it separates Johnston from North  
11 Providence, and that would be on 44, Smith Street.  
12 That's the bridge.

13 MS. GARYPIE: Okay. I'm going to hand  
14 you a map, if you can mark it.

15 (Whereupon, EPA-Neri Exhibit No. 1 was  
16 marked.)

17 Q. This map has been marked Exhibit 1, and it  
18 is, you'll see a Sanborn Map from the year 1965,  
19 and I'll ask you to just take a look at that to  
20 orient yourself and let me know when you're all  
21 set.

22 A. Pretty well set.

23 Q. Okay. If you could take -- I'm going to hand  
24 you a green pen --

25 A. Uh-huh.

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1 Q. -- and if you could mark on the map  
2 approximately where Amber Street is on the  
3 Johnston side of the river, mark that with an "X".

4 A. It's right here.

5 Q. And can you, using arrows, point -- I'm  
6 sorry -- draw on the -- next to the river where  
7 the pipes were that you saw?

8 A. If this is the bridge, which I'm  
9 assuming it is --

10 Q. Yes.

11 A. -- the pipe would be here and there was  
12 another one in here and they both emptied into the  
13 river.

14 Q. Okay. And did these -- the buildings that  
15 are represented and marked "Metro-Atlantic, Inc.",  
16 they are depicted on this map, do these buildings  
17 appear to accurately portray what you saw when you  
18 lived in the area at that time?

19 A. Okay. Actually, to be honest with you,  
20 these -- this was all trees here.

21 Q. Okay. When you say, "here" --

22 A. On the bank of the North Providence side  
23 of the river was trees. The actual -- my street  
24 is probably more here. The actual -- going out of  
25 what was going on in here is in this area right

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1 here. These buildings are pretty, pretty  
2 accurate. I'm trying to think of where -- this is  
3 the furniture store that used to be here. That's  
4 a warehouse. It used to be --

5 Q. When you say, "here" for the furniture store,  
6 can you put a "1"?

7 A. Yes. This is -- this burnt down. This  
8 is a warehouse. When I was a kid anyway, that was  
9 a warehouse. This used to be -- if I can remember  
10 correctly, I'm going to say this -- this is -- the  
11 building was 19 what? What did you say?

12 Q. This map is 1965.

13 A. Okay. Because this used to be A & P or  
14 the supermarket here.

15 Q. Okay. Can you mark that with a No. 2?

16 A. Yes. And this was a driveway. This  
17 used to go all the way around here, and I don't  
18 know where this picture is from. This is  
19 something that we couldn't see from our house  
20 because the building was being blocked.

21 Q. Okay. And can you circle the bridge that  
22 you're referring to?

23 A. (Witness complies.) No. 4.

24 Q. Okay. That's fine. No. 4. And when you  
25 were living at Amber Street, besides the pipes,

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1 did you see any other type of waste disposal?

2 A. Yes. In the evening, you could hear  
3 either bulldozers or heavy equipment always in  
4 here burying -- as a matter of fact, they had a  
5 fire in here too, but you could actually hear  
6 explosions from the barrels blowing up.

7 Where it was, I couldn't tell you. I mean we  
8 used to see them sometimes go in the sky and come  
9 back down again, so -- but most of the activity --  
10 I wish this map was a little accurate because I  
11 would like to find our street because I could  
12 bear -- if I found the street here, I can show you  
13 exactly, you know, from where I was looking at  
14 exactly where we were.

15 MS. GARYPIE: Okay. Why don't we take a  
16 break and I'm going to see if I can get another  
17 map.

18 ( P A U S E )

19 THE WITNESS: I think we can go from  
20 here. If I put this like this on here, because  
21 this says Steere Avenue, okay, that will give you  
22 some kind of a perspective on the way the river  
23 is.

24 Q. And, for the record, if I could just note  
25 that Mr. Neri is comparing Exhibit 1 with a map on

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1 the trailer wall labeled "Woonasquatucket River,  
2 Soil Sampling Results for TEQ." Take your time.

3 A. It's been so long I haven't been here,  
4 but I think this is Vacca, Brayton. I think this  
5 would be -- this one here, the fourth street is  
6 Amber Street, according to the map I mean. I'm  
7 going to guess that's it.

8 MS. GARYPIE: Let's break again. I'm  
9 going to see if they can get on the Internet and  
10 get a map.

11 ( P A U S E )

12 MS. GARYPIE: No luck.

13 **BY MS. GARYPIE:**

14 Q. Why don't we go back to Exhibit 1? You can  
15 see where coming down from Smith Street The  
16 Metro-Atlantic building stopped.

17 A. Uh-huh.

18 Q. Assuming that this is where they -- this is  
19 accurate, this is where they stopped in 1965, was  
20 it below that area that you saw activities  
21 occurring or was it actually up by the buildings?

22 A. The activity that we saw, when we were  
23 kids, was more in this area right here. I circled  
24 it.

25 Q. You marked that with a "5"?

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1 A. "5".

2 Q. And what type of activity would you see  
3 there?

4 A. Heavy equipment, burying barrels, black  
5 barrels. The number of barrels would be -- hum --  
6 in the thousands. It wasn't something -- this was  
7 done five days a week every night.

8 Q. Okay. I'm going to ask you to slow down for  
9 just a bit.

10 A. Sure.

11 Q. I know you said that you were at Amber Street  
12 between '56 and '68. Was it that entire time span  
13 that you saw these activities every -- every day,  
14 five days a week?

15 A. It was so common that it was -- I'm  
16 going to say -- if I had to -- I'm going to say  
17 more -- I'm going to say '68; I'm going to say  
18 more like '65. I think it was heavier around  
19 1965, just because I used to hang around.

20 In 1965 -- I'm trying to get my age; that's  
21 what it is because, actually, when I was 16, I was  
22 driving so we didn't play around -- we played in  
23 this area when we were kids, this area, more from,  
24 say, from probably nine-to-fourteen period,  
25 whatever years that -- that that was.

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1 Q. So that would have be '57 --

2 A. Yes. That would be more of the years  
3 that we really played there. I went to school. I  
4 went to Saint Lawrence till 1963. So it would be  
5 less -- it -- it -- it would be -- because '62, it  
6 was before -- I knew the stuff was before '62, the  
7 stuff that was going on. You just said '62.

8 Q. So you said you moved there when you were  
9 about eight. You would have been -- in '56 you  
10 would have been eight; so '57 you would have been  
11 nine, so between '57 and '62?

12 A. '63.

13 Q. '63?

14 A. Definitely.

15 Q. And can you -- there's a location where the  
16 Saint Mark's School appear on this map which is  
17 Exhibit 1?

18 A. This is Smith Street. It would be up  
19 here somewhere because this is Woonasquatucket  
20 Avenue; this is Mineral Spring Avenue there.  
21 That's why this is all kind of -- I think on a  
22 proportion or, in other words, my street is out of  
23 proportion here because I think it was more  
24 towards this area, which is the 5 area I'm looking  
25 at, but Saint Lawrence School should be around

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1 Steere Avenue in this area here. I'll mark that  
2 "6".

3 Q. Great. Okay. And when -- going back to the  
4 activity that you observed, what type of equipment  
5 would you see out there?

6 A. The only thing we could see -- if we  
7 were up on the hill right over here, that would be  
8 Edna Street.

9 Q. When you say, "the hill right over here," are  
10 you referring to the hill across the river?

11 A. Yes. In -- in Johnston, I'm referring  
12 to the hill at the bottom of Edna Street. You  
13 could see bulldozers -- bulldozer, period,  
14 bulldozer singly.

15 Q. Was there ever more than one bulldozer?

16 A. Not that we could see because we were  
17 kind of camouflaged in the -- the wooded area.

18 Q. Did the bulldozer have any markings on it?

19 A. No.

20 Q. Do you recall --

21 A. Not that I can remember.

22 Q. Do you recall what color it was?

23 A. Honestly, no. If I had to guess, I'd  
24 say yellow but I don't want to do that.

25 Q. And was there any other type of equipment

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1 that you saw?

2 A. No. Not that I saw.

3 Q. How did the -- how was the burial  
4 accomplished?

5 A. What we could see was the barrels  
6 being -- again, I don't want to say equipment. If  
7 I had to say equipment, I'd say a forklift where  
8 barrels would come in and just drop them in  
9 this -- in this area.

10 Q. When you say, "this area," do you mean at the  
11 edge of what are you've marked as?

12 A. "5".

13 Q. "5"?

14 A. Yes.

15 Q. Okay.

16 A. And, you know, I mean I wasn't really  
17 paying attention but they were buried at night.  
18 Every night they would bury barrels and barrels  
19 and barrels.

20 Q. What -- what time at night would they be  
21 buried?

22 A. I used to come home from school around  
23 3:30. I used to go play, come back suppertime  
24 somewhere around 4:30 to 7:00 we'll say. It was  
25 on constantly. You could actually hear the

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1 tractors or bulldozer, the heavy equipment  
2 actually, you could hear them more than see them,  
3 from where I was anyways.

4 Q. Do you know where the drums, which were sat  
5 at the edge of Area 5 an Exhibit 1, do you know  
6 where those drums were coming from?

7 A. Coming from -- what building you're  
8 talking about? This area right here.

9 Q. Okay. Can you mark that with --

10 A. "7"?

11 Q. No. 7?

12 A. Right here. No. 7.

13 Q. Do you know -- I'm sorry. Were those drums  
14 placed near the building or were they in an open  
15 area?

16 A. I believe they would be open area  
17 because we could see the barrels, so I'm going to  
18 say open area.

19 Q. Were the drums ever stacked?

20 A. Yes.

21 Q. In Area 7?

22 A. In all -- in -- in -- I've seen them  
23 stacked in all this area.

24 Q. Okay. And when say, "all this area," do you  
25 mean between where you've marked 7 to --

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1 A. 7 to 5.

2 Q. And where you've marked 5?

3 A. Yes.

4 Q. When the drums were buried in Area 5, was  
5 there a hole dug first?

6 A. Like I said, from where I was, there --  
7 there had to be a hole, but I'm just saying from  
8 where I was, where my house was situated, all I  
9 could see was the bulldozer covering, not actually  
10 burying it.

11 I don't know if they dug the hole in the  
12 morning or afternoon or whatever it may be. In  
13 other words, I would just see the bulldozer like  
14 travelling in this area.

15 Q. So would you see drums in a hole and, then,  
16 the bulldozer would push dirt over them?

17 A. They were set in a hole and the  
18 bulldozers would cover them; yes.

19 Q. About how many per evening do you think were  
20 covered?

21 A. I know the stacks that I've seen were  
22 like high. They were like maybe 5 barrels high  
23 and --

24 Q. When you say, "the stacks," do you mean the  
25 stacks in Area 5 or in Area 7?

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1 A. 7.

2 Q. In Area 7?

3 A. Yes.

4 Q. Okay.

5 A. They were stacks as far as -- on top of  
6 each other, stacks and stacks and stacks. How  
7 many were buried at night? I'm going to say  
8 hundreds because it wasn't like -- this -- this  
9 went on from, like I said, maybe around suppertime  
10 to -- to dusk, so I mean it takes, you know,  
11 that's quite a -- you could do a lot of work in  
12 that area, so I can't tell you how many barrels  
13 accurately were -- were buried, but all I know was  
14 that it took a long time for them to do it and  
15 there was a lot of barrels that we saw stacked  
16 and, then, not there no more, so --

17 Q. You mentioned that barrels were black. Were  
18 any of the barrels other colors?

19 A. They may have been but the ones that I  
20 could remember, in my mind, were black.

21 Q. Did they have any markings on them?

22 A. Not from where I could see. No. I  
23 couldn't tell you if there was any markings on  
24 them. There might have been. I don't know.

25 Q. Did they have covers on them?

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1           A.     Yes.   They were because -- because --  
2           because they were stacked.   Some actually you  
3           could see them taking the barrels like that and  
4           stacking them like that.

5           Q.     So they would take them from a vertical  
6           position --

7           A.     Yes.

8           Q.     -- and stack them in a horizontal position?

9           A.     Yes.

10          Q.     Did you ever see anything leak out any of the  
11          closed drums?

12          A.     Actually, eyewitness, no, I did not.

13          Q.     Did any of -- did you ever hear anyone speak  
14          of leaking drums?

15          A.     At the time, no.

16          Q.     You mentioned that there were fires on the  
17          North Providence side of the river.   Where were  
18          those fires?

19          A.     Around where I have the -- the No. 5  
20          circled.

21          Q.     And were those fires -- I'm sorry.   Was that  
22          the area where you observed drums exploding?

23          A.     Yes.

24          Q.     Were there any other areas of the site where  
25          you observed drums exploding into the air?

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1           A.     Wherever they were burying them at the  
2 time. I don't know if they put them in a hole and  
3 started a fire and, you know, let them burn first.  
4 I don't know what the procedure was. I have no  
5 idea what the procedure was.

6           Q.     When a drum went up into the air, was there  
7 any -- did any material spray out of the drum?

8           A.     I couldn't tell. That was the greatest  
9 fire works around for the kids. I couldn't -- I  
10 couldn't tell you. Again, we are talking about  
11 Amber Street being on one side of the river and  
12 looking to where we are sitting right about now,  
13 and in that distance, you know, it's quite -- it's  
14 quite a bit.

15          Q.     When you saw the drums either in Area 5 or in  
16 Area 7, did they appear to be new?

17          A.     Definitely. Yes. Shiny.

18          Q.     Both in Area 5 and Area 7?

19          A.     Correct.

20          Q.     So the drums that were being buried appeared  
21 to be new?

22          A.     Yes. They were shiny, shiny barrels,  
23 black barrels; the ones I saw anyway.

24          Q.     Do you recall trucks entering the  
25 Metro-Atlantic area from Smith street carrying

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1 drums?

2 A. Oh, that was -- that was -- that was a  
3 common thing.

4 Q. What kind of trucks did you see entering that  
5 area?

6 A. Flatbed trucks with railings, with  
7 barrels in them. That's how I can best describe  
8 them.

9 Q. Do you know if the trucks belonged to  
10 Metro-Atlantic?

11 A. I can't say for sure.

12 Q. Did they have any markings on them?

13 A. They might have. They might have but  
14 you're talking a long time.

15 MS. GARYPIE: You bet.

16 Q. Do you recall what color they were?

17 A. There was a few but I remember in my  
18 mind -- I don't know -- but I got a red cab, red  
19 cab, red color cab and -- and it might not have  
20 been all red trucks but I can remember trucks  
21 coming in with a red cab on it, had a red cab and  
22 a flatbed like.

23 Q. Were the drums on the trucks empty or full?

24 A. Oh, I -- I don't know.

25 Q. Did they have covers on them?

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1           A.     They were -- they would be vertical.  
2     They were vertical.

3     Q.     So the covers would have been on the top?

4           A.     Yes, so you wouldn't be able to tell.

5     Q.     Were they stacked on the truck did you say?

6           A.     Uh-huh.

7     Q.     How high?

8           A.     In other words, they would -- they would  
9     have a -- a wooden corral type look and they would  
10    be vertical and -- and I don't -- I don't even  
11    know -- I can't -- I don't believe they were  
12    stacked per se. In other words, on top of each  
13    other. I think they were just on there vertical.

14    Q.     So they would be one layer?

15           A.     Yes. The ones that, you know --

16    Q.     Approximately how many drums would be on each  
17    truck?

18           A.     More than ten. I -- I really couldn't  
19    tell you.

20    Q.     Did you also see trucks leaving the  
21    Metro-Atlantic area and turning onto Smith street  
22    containing drums?

23           A.     Turning into Smith Street? I -- I can't  
24    tell you. No, I don't know.

25    Q.     But you do remember them?

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1           A.    I know they used -- they used to come  
2           and go all day long.  Some were full; some had  
3           barrels; some did not, you know, but there was  
4           activity here all day long, in and out, in and out  
5           type of deal.

6           Q.    Was there any other type of waste disposal  
7           activity that you observed in the Metro-Atlantic  
8           area?

9           A.    Other than dumping into the -- into the  
10          water with the dyes or whatever that was, that was  
11          in there, there was a -- I think there was a stack  
12          here.  I'm not sure about that though.  It was so  
13          long ago.

14          I can't remember if it was -- it was the  
15          flames I'm looking in my mind seeing that were  
16          from the barrels or they had a furnace going too  
17          but I can't remember that, and there used to be  
18          fires but I don't remember if they were from the  
19          furnace or from the -- from the activity in the  
20          barrels.

21          Q.    Returning to Area 5, did you ever see smoke  
22          coming from that area?

23          A.    Oh, definitely.  I couldn't tell if it  
24          was from the furnace or from -- we saw exploding  
25          barrels, so there was a flame there with smoke,

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1 yes. That's what I was trying to get to.

2 Q. I guess what I meant to say was, was it usual  
3 to see smoke or mist coming from that area?

4 A. It was very unusual to see smoke, you  
5 know, different colors of smoke, you know, yellow  
6 and different colors but that was -- that came  
7 with the explosions too.

8 Q. And how often would those explosions occur?

9 A. We heard them every night.

10 Q. During from -- I'm sorry -- from 1957 to '63?

11 A. Boy, it was so common, I mean I don't  
12 want to say the wrong thing but it was so common  
13 that, yeah, we used to sit and watch, you know,  
14 wait for the big explosions.

15 Q. And this was -- this was Monday through  
16 Friday?

17 A. Yeah.

18 Q. And was there ever activity on Saturday or  
19 Sunday?

20 A. I -- I want to say, yeah, because I  
21 remember my father saying to me how come they're  
22 doing this on the weekend? I remember an incident  
23 like that but if they did it regularly, I don't  
24 know; I can't remember, but I -- I remember there  
25 was occasions that they would be down there

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1 because I remember my father saying it was like  
2 even on Sundays they would do this. You know what  
3 I'm saying? So -- because Sundays used to be  
4 peace and quiet and he'd hear the tractors going  
5 once in a while down here, but I don't think -- I  
6 don't think it was an ongoing thing; I think it  
7 was -- I think it was more of a sporadic type of  
8 deal. I don't remember.

9 Q. It was sporadic on the weekends?

10 A. I think so. Because I don't remember --  
11 I don't remember every weekend but, again, you're  
12 going back a couple of years, two, three.

13 Q. Okay. And just -- just focusing on those  
14 years, '57 to '63, did you ever take any  
15 photographs of the area where the drums were seen?

16 A. No. No. We were kids and we would ask  
17 questions, you know, but I mean that's as far as,  
18 you know --

19 Q. Who did you ask questions?

20 A. We'd ask questions, you know, why -- you  
21 know, what's going on here? I would ask my father  
22 and, you know --

23 Q. And how would he respond?

24 A. Well, they are just doing their job, you  
25 know. That's the type of deal. They are on their

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1 land; you're on your land, you know, that type of  
2 deal.

3 Q. Do you know between '57 and '63 the name of  
4 the company that was operating?

5 A. The only -- I always remembered this as  
6 Metro-Atlantic warehouse; it wasn't warehouse;  
7 chemical plant. That was the word for it. It was  
8 the Metro-Atlantic Chemical Plant as far as I  
9 know. If somebody else was in here, it would  
10 still be called Metro-Atlantic Chemical Plant, so  
11 I don't know.

12 Q. Was that the common name in the community for  
13 this area?

14 A. I believe so. That's what it said on  
15 the sign, Metro-Atlantic. They used to have the  
16 sign out in front.

17 Q. And there was no other name on the sign?

18 A. Not that I can remember. I can remember  
19 Metro-Atlantic and just like I remember Jack &  
20 Harry's. There was other stores but you always  
21 remember Jack & Harry's or whatever you want to  
22 call it.

23 MS. GARYPIE: I'm going to take a quick  
24 break.

25 A. Okay.

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1 ( P A U S E )

2 (Whereupon, EPA-Neri Exhibits No. 2A  
3 through 2F were marked.)

4 **BY MS. GARYPIE:**

5 Q. I'm going to hand you Exhibits 2A, 2B, 2C,  
6 2D, 2E and 2F. I'm going to ask you to take a  
7 look at those and let me know when you're done  
8 reviewing them.

9 A. (Witness complies.)

10 Q. Done?

11 A. Yes.

12 Q. Okay. And what do those photographs appear  
13 to be?

14 A. A Metro-Atlantic truck.

15 Q. Did you see those trucks when you were living  
16 on Amber Street?

17 THE WITNESS: Coming and going?

18 MS. GARYPIE: Right.

19 THE WITNESS: This is all one truck,  
20 right?

21 MS. GARYPIE: I believe so.

22 A. Yeah. I've seen maybe one or two of  
23 these but I mean I more see -- remember the other  
24 trucks with the red cab on it with the -- I  
25 remember those more vividly than -- than these

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1 here.

2 Q. Okay.

3 A. I don't know how many of these they had  
4 but I know the ones that I was talking about,  
5 because we used to walk right by the place and we  
6 used to stop because they used to come out of the  
7 gates, so I remember there was more than those.

8 Q. So you just mentioned gates. Were there  
9 gates at the driveway --

10 A. Yes.

11 Q. -- where the -- the property met Smith  
12 Street?

13 A. Yes, on Smith Street. This is the end  
14 of the buildings. The gates are here.

15 Q. Did you ever -- again, focusing on the years  
16 '57 through '63, did you ever walk on the  
17 Metro-Atlantic property?

18 A. No. Not on the property, no.

19 Q. Did you ever walk on the property, the area  
20 south of what you've marked as 5 on this map?

21 A. On the North Providence side, no. As  
22 far as we'd go would be Steere Avenue, which would  
23 be here.

24 Q. So would you walk west on Steere Avenue until  
25 you reached the tailrace, the water?

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1           A.     Yes, only because we had friends that  
2 lived on the street and we used to -- we used to  
3 play ball, baseball and stuff like that or cut  
4 through the yard and stuff like that but not  
5 actually go on the property, no.

6           Q.     And when you were on the Steere Avenue side  
7 of the property, could you observe any of the  
8 activities you just described?

9           A.     No. No. I never saw any activity from  
10 the Steere Avenue side because of the time of day.  
11 We used to play here during the day and on  
12 weekends and this activity, most of it was done on  
13 evening time.

14          Q.     Do you know the names of anyone who worked at  
15 Metro-Atlantic at that time?

16          A.     No, I do not.

17          Q.     Did you have any friends whose fathers worked  
18 at Metro-Atlantic at that time?

19          A.     Not that I recall.

20          Q.     When you left Amber Street in approximately  
21 1968, did your parents continue to live there?

22          A.     Yes.

23          Q.     And are they still living?

24          A.     My -- my mom is living.

25          Q.     And is she still on Amber Street?

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1           A.     She's right in that building across,  
2 right there.

3           Q.     And when you say, "that building," are you  
4 referring to Centredale Manor?

5           A.     Centredale Manor, yes.

6           Q.     Does she have any recollection or did she  
7 ever discuss the activities that you just talked  
8 about?

9           A.     Not to me.

10          Q.     And does she have the same last name as you  
11 do?

12          A.     Yes, she does.

13          Q.     After you left Amber Street in 1968, did you  
14 ever come back to visit the area near the  
15 Metro-Atlantic facility?

16          A.     Yes. When I visited my parents, yes.

17          Q.     Did you --

18          A.     I also took a walk with my sons down --  
19 because there's a -- if you walk from Centredale  
20 down here, there's another place -- Allendale Mill  
21 used to call it; there's a bridge there, and it  
22 goes into North Providence just before Lee Romano  
23 field.

24          Q.     So when you're talking about where you used  
25 to walk, was it on the Johnston side of the

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1 Woonasquatucket?

2 A. Yes, it was.

3 Q. Was --

4 A. I'm sorry. What there was, there's  
5 railroad tracks that the railroad train used to  
6 come right by here along the Woonasquatucket  
7 River.

8 Q. Right next to the shore?

9 A. Yes.

10 Q. Okay.

11 A. And on the other side of the track or  
12 the other side of Smith Street --

13 Q. The north side?

14 A. Yes. Towards the Waterman Avenue side,  
15 that was a train station at one time and cars, you  
16 know, railway cars used to be parked in there; we  
17 used to play in there, so what I did was took my  
18 sons for a walk from my old house on 11 House  
19 Street on North Providence, which is on the other  
20 side of Woonasquatucket Avenue. That's up near  
21 the Lee Romano field, and we walked from the  
22 Allendale Mill right down -- right down this --  
23 the railroad tracks -- I call them the railroad  
24 tracks -- which is now a path looks like on the  
25 Johnston side and I showed them where I lived and

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1 stuff.

2 Q. And when did you -- was it more than one time  
3 that you took that walk?

4 A. I took it a couple of times, yes.

5 Q. Approximately what year?

6 A. Oh, you're really testing me.

7 Q. Take your time.

8 A. I'm going to say '87; around '86, '87,  
9 all of the activity was gone, you know. I mean it  
10 was -- these buildings were up and stuff like  
11 that, so it wasn't that we saw anything by taking  
12 the walk or anything.

13 Q. When you say, "these buildings," do you mean  
14 Centredale Manor and Brook Village?

15 A. Correct.

16 Q. When you were back in the area after 1968,  
17 other than the walks with your sons, did you  
18 observe activities continuing, drum activities  
19 continuing?

20 A. I would say the -- the -- they were  
21 declining at that time.

22 Q. I'm sorry?

23 A. They were declining, if anything, at  
24 that time, '68. The reason why I'm saying that is  
25 because it was funny because I had my next-door

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1 neighbor, which wasn't from this area, and he  
2 asked me to go fishing one day and he goes, "Let's  
3 go fishing down the Woonasquatucket River," and I  
4 laughed and I said, "What are you, nuts?"

5 He said, "Why? There's great fishing in  
6 there, you know," but that was, I'm going to say  
7 about '72, '69, '72, somewhere in that area where  
8 the water, I believe, was starting to come -- come  
9 back because of the -- I guess the activity wasn't  
10 being polluted or whatever.

11 I don't know if it was that early '72, but I  
12 remember him saying, "Let's go fishing down here,"  
13 and I know my son was born -- he was born in '72,  
14 that's why I'm saying '72, so around '72, in that  
15 area, because when I was a kid, there was no fish  
16 in this area.

17 There was some snapping turtles, you know,  
18 turtles used to come up between the railroad  
19 tracks and they just actually ceased to be. I  
20 mean I took a walk down after I got married in '68  
21 and there was -- there wasn't any at all, and I  
22 couldn't believe how in a few years -- I'm going  
23 to say five -- that the -- all the stuff had --  
24 because they had, I guess, gone out of business or  
25 whatever Metro-Atlantic and they were building

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1 these buildings here. I don't remember what year  
2 this was built but the river was starting to -- to  
3 come around again. What I mean by "coming  
4 around," I mean activity in the water.

5 Q. Do you know what products were produced at  
6 the Metro-Atlantic facility?

7 A. Not at all. I know it was a chemical  
8 plant. I assume -- I thought in my mind it was  
9 dyes but -- but maybe I'm wrong. Because I saw  
10 those colors going into the water, so I -- I  
11 assumed it was dyes.

12 Q. And when material would come out of the  
13 pipes, was that constant?

14 A. I -- I believe -- I believe it was not  
15 constant. I believe they put it on at certain  
16 times and shut it off at certain times. I don't  
17 believe it was constant because I didn't see  
18 constantly -- I didn't see dye going in  
19 constantly.

20 If you walked by at 3:30 in the afternoon,  
21 the dye was flowing but in the morning, when I  
22 went to school, I don't remember seeing anything  
23 being -- anything going, so if I had to make a --  
24 a -- I don't want to say guess but I'm going to  
25 say it was turned on and turned off because it

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1 wasn't constant.

2 Q. How thick was the material that was  
3 discharged?

4 A. It was liquid. The pipes that they had  
5 I believe weren't no bigger than the cover of this  
6 Dunkin' Donuts. If I say anything, it would be a  
7 little smaller; they weren't any bigger than this;  
8 they were smaller.

9 Q. How many inches in diameter?

10 A. That's about, I'm going to say,  
11 four inches, so I would say the pipe was probably  
12 three inches; no more than four.

13 Q. How high was it from the water surface?

14 A. It was the bank. It was about maybe  
15 two feet down from the top and it came out and  
16 it -- it went into the water, so it was like a --  
17 it wasn't that the pipes were in the water at all.  
18 And any time the water being high and low, because  
19 this -- this river does get high and low, at any  
20 time, this pipe was not on the water; it was above  
21 the water.

22 Q. Would the pipe hang out over the water?

23 A. Yes. The pipe stuck out two, maybe  
24 three feet from the -- from the bank. In other  
25 words, it stuck out maybe about that far.

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1 Q. Was it buried once it reached the shore?

2 A. Correct. It was about probably -- I'm  
3 going to say a foot to two feet down. As a matter  
4 of fact, I still, I -- I haven't been here in a  
5 while but you might -- it might still be there.

6 Q. I'm going to ask you just a few more  
7 questions about the operations before things  
8 slowed down in the early 1970s.

9 There's a building, which is depicted on  
10 Exhibit 1, just to the left of where you've marked  
11 the No. 7. Do you recall any particular  
12 activities in that building?

13 A. No. I'm trying -- that's why it's so  
14 important to find out where my street is on this  
15 because I don't know if my street is on this side  
16 of it or that side of it. I don't remember that  
17 building at all.

18 Q. So in other words, you're not sure how far  
19 north or south Amber was --

20 A. Correct.

21 Q. -- on the Johnston side?

22 A. Right, because on the building here, I  
23 know we were more in the back of Metro-Atlantic  
24 than the front of Metro-Atlantic.

25 Q. So, in other words, you were on the south

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1 end?

2 A. I believe so, because I mean if you  
3 notice my "X" over here, it's at the end of the  
4 building and I think we were more towards the back  
5 end of the building because we saw more. That's  
6 where all the activity was. I'm saying that this  
7 "X" might be -- might not be perfect in this spot  
8 where it should be, so this building could be more  
9 north or more south --

10 Q. Okay.

11 A. -- in other words, from my vision.

12 Q. But you don't -- do you have -- other than  
13 the drum burial activities in Area 5, and the drum  
14 stacking in Area 7, do you recall any other types  
15 of activities around the buildings in that north  
16 end of the site?

17 A. No. Like I said before, we had a tree  
18 line here that really could hear things but you  
19 couldn't really -- you have to really go down and  
20 investigate to really see what's going on. Don't  
21 forget we are up -- we were up -- in other words,  
22 if you look on the Johnston side, they are up  
23 higher, maybe 20 feet higher than the North  
24 Providence side, so you're kind of looking down  
25 into a tree line type of deal all the time.

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1 Q. So when you were looking down onto Area 5  
2 here on exhibit -- when you were looking over to  
3 Area 5 here on Exhibit 1, you were looking down  
4 onto the --

5 A. Yes. If you're looking for my house,  
6 yes, but playing in this area, on the railroad  
7 tracks and, you know, riding the cars and stuff,  
8 you -- you would be -- you would be eye level and  
9 you could see the stuff.

10 Q. So did you know that drums were in a hole in  
11 Area 5 because you were observing from the  
12 elevated side on the Johnston side?

13 A. No. I mean you could see -- by walking  
14 the tracks -- like I said, I used to walk the  
15 tracks every day, the railroad tracks, from  
16 Allendale Mill to -- back to my house because my  
17 girlfriend lived in North Providence and I walked  
18 back every night, so that's most of the times I  
19 would -- that's why I'm saying at suppertime that  
20 I would see the activity, most of the activity.

21 Q. Did you ever see any old drums being moved  
22 around in Area 5?

23 A. The drums that I can recall in my mind,  
24 there might have been, but the ones I've -- they  
25 were black, and for some reason they are in my

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1 mind black. If they were old, new or whatever,  
2 they looked, some of them, you know, looked shiny,  
3 so I would say new but --

4 Q. Were any of the drums crushed in any way or  
5 dented?

6 A. Oh, yeah. They were dented.

7 Q. Were they dented --

8 A. I mean they weren't perfectly round  
9 barrels. They were just like scooping these  
10 babies, you know, and throwing them; it wasn't  
11 that they were being neat with these things or  
12 anything, so they would be dented and stuff like  
13 that.

14 Q. So were they dented in the process of burial  
15 do you think?

16 A. Oh, I would say definitely. I mean  
17 nobody was being -- I don't think anybody was  
18 taking their time stacking, putting -- like to  
19 say, putting one barrel on top of it like that.

20 I don't think that's -- I think it was more  
21 like, you know, they picked it up with a bulldozer  
22 whatever, they dumped it in there. I don't -- I  
23 don't -- again, you know, I wasn't really on this  
24 property or right close to see exactly what was  
25 going on, but I don't think they were taking it

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1 and getting the things and, you know, stacked  
2 perfectly, you know, being dainty about it. I  
3 think it was just like throw it in the hole type  
4 of deal.

5 Q. In the Area 7 where you saw drums stacked --

6 A. They were coming out on -- they would be  
7 coming out on a -- on a pallet.

8 Q. Do you know where they were coming out from?

9 A. No. Well, I don't know exactly because,  
10 I believe, it was around in this area right here  
11 and what they --

12 Q. When you say, "this area," you mean the  
13 general area of what you've marked as 7?

14 A. 7, yes; in that general area. This  
15 building is bothering me because I don't remember  
16 seeing this building.

17 Q. And when you say, "this building," you're  
18 referring to the building just to the left of  
19 No. 7 on the map?

20 A. Yes. Was this a big building do you  
21 know?

22 Q. I don't know.

23 A. I mean a high building or --

24 Q. I don't know.

25 A. Because we had clear -- that's why I'm

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1 saying, we had a clear view of -- of what was  
2 going on here. I don't remember a building being  
3 in my way.

4 Q. And the drums that you saw stacked in Area 7,  
5 were they dented?

6 A. They were -- all I know, they were on  
7 pallets. If they were dented or not, I can't say  
8 if they were or not per se. I'm not going to make  
9 a statement like that. I don't know.

10 Q. Did you ever see these drums being moved  
11 around without heavy equipment? In other words,  
12 with one man moving one drum?

13 A. I have -- I didn't see one man doing it,  
14 put it that way, no. I can't remember if they  
15 were -- what I saw was what I saw and, like I  
16 said, it was pallets, boom, drop them off; go get  
17 some more, boom, come back.

18 Now, if they were taken from a truck, I  
19 couldn't tell you because my view is blocked or  
20 whatever but we are coming from this area and  
21 going to that area. They could -- they could have  
22 been coming from the truck. I don't know.

23 Q. When the drums were dumped into what you've  
24 marked as Area 5, did they ever break open?

25 A. Again, if they did, I couldn't see from

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1 where I was. I mean you're talking a long view.  
2 I -- I -- you know, I just saw them being, you  
3 know, buried.

4 Q. Do you recall the name New England Container  
5 Corporation being associated with this property  
6 depicted on Exhibit 1?

7 A. I've heard the name before but I  
8 don't -- I don't -- I don't know where I saw it.

9 Q. And you were describing the Woonasquatucket  
10 as being essentially barren in terms of water  
11 life, birds, that sort of thing?

12 A. More -- more fish. I was talking about  
13 fish.

14 Q. Fish? Okay. Were there other areas along  
15 the Woonasquatucket River that you believe may  
16 have been discharging fluids into the river?

17 A. Yes.

18 Q. Or that may have affected the river?

19 A. Yes.

20 Q. And what area or areas would that be?

21 A. If you get to Waterman, go to Waterman  
22 Avenue, which is right here, this -- this is --  
23 I'm -- I put the bridge here because there's water  
24 going on both sides so I -- okay -- but if you go  
25 on the other side of the bridge, there's a bunch

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1 of islands here. There's a Masonic Temple right  
2 here. There it is right here, there is a Masonic  
3 temple.

4 Q. Okay.

5 A. All right? Behind the Masonic Temple,  
6 there's a cove, which it shows right here.

7 Q. Okay. Can you mark the cove with a No. 8?

8 A. Okay. There was a place called D & S  
9 Screw Products. I don't know if this is the  
10 building or not, but this is the cove and they  
11 used to dump and they wouldn't even put the barrel  
12 in. They would just dump their liquids right into  
13 the -- right into the water.

14 Q. And can you mark the approximate area that  
15 that building would be for D & S Screw Products  
16 with a No. 9?

17 A. I would say around here. It's -- it's  
18 this building or the one next to it but this the  
19 cove.

20 Q. When you're saying, "this building" --

21 A. There's only showing one building here.

22 Q. Near the No. 9?

23 A. Yes.

24 Q. Okay.

25 A. And I thought there were two buildings,

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1 one on each side. This could be like out of  
2 proportion or whatever. This could be a building;  
3 that could be a building, but I know it was D & S  
4 Screw Products because I worked there.

5 Q. How long did you work there?

6 A. One day was enough for me.

7 Q. Approximately what year was that?

8 A. '66 or '67.

9 Q. And why did you only work there one day?

10 A. Or '65, '66, '67, somewhere in there  
11 because I was in high school. Somewhere in there.  
12 I graduated in '67 so somewhere in there.

13 Q. Why were you there just one day?

14 A. It was a slave shop.

15 Q. How do you mean?

16 A. Well, I had -- my job was to put -- get  
17 the screw and put a little thing on the top like  
18 this and -- I don't know -- with a drill and it  
19 wasn't for me. My hands were too big.

20 Q. And when you talk about dumping into the cove  
21 that you've marked as Area 8, how would the  
22 dumping be accomplished?

23 A. They would -- one man or two men would  
24 actually get the barrels and -- and roll them.

25 Q. Were they in a vertical position --

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1           A.     Yes.

2       Q.     -- when they were being rolled?

3           A.     Yes.  In other words, they had no covers  
4     on them.  They just brought them down the bank and  
5     they just poured them into the water.

6       Q.     And what was in the drums?

7           A.     What they call raw fastenings or what do  
8     you call it?  Raw -- the waste that they have from  
9     their dipping of their -- plating, whatever you  
10    want to call it.  Is it plating?

11    Q.     Was there a plating operation in the screw  
12    company?  In other words, was there a shiny  
13    metal --

14           A.     Right.

15    Q.     -- that was being applied to the screw?

16           A.     I believe -- if it wasn't D & S Screw  
17    Products, they were -- they were in the same  
18    building or whatever, but that's why I said D & S  
19    Screw Products because I remember the name because  
20    I worked there, but the building, that building  
21    there, that's where the barrels came out -- came  
22    out of, and there was -- it was the stuff they  
23    use -- I guess all the waste that they had.  I  
24    don't know the process of jewelry, so I couldn't  
25    tell you exactly what it was but it was a liquid.

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1 Q. Just so I understand, was it from the screw  
2 company or was it from the building, the -- the  
3 company next door?

4 A. I believe it was from the -- like I  
5 said, I don't know if those two guys were  
6 together, the same company or not.

7 Q. But it was a separate operation from the  
8 screw --

9 A. I don't know. I don't know.

10 Q. Okay.

11 A. All I'm saying is that building with D &  
12 S Screw Products was in. There might have been  
13 more than one company in that building. I don't  
14 know. But I only used D & S Screw Products  
15 because I -- I worked there, so I knew the name of  
16 it. They used to bring the stuff down and dump it  
17 into the water.

18 Q. What -- what color was the liquid -- I'm  
19 sorry. Was it liquid in the drums?

20 A. Correct.

21 Q. And what color was it?

22 A. Mostly, I believe, were clear than  
23 anything else, but it wasn't water. It might have  
24 been oil; it might have been -- because when it --  
25 when it was put in the water, it made that

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1 gasoline type of cloud or what do you want to call  
2 that when you --

3 Q. Was there a sheen on the water?

4 A. Yes. Correct.

5 Q. Did it turn a color when it hit the water?

6 A. Not that I could see. Again, I was on  
7 the other side of the water. This cove that we  
8 drew here, the -- the -- in other words, the  
9 railroad station was here, and you're talking  
10 probably from here to the edge of the building, so  
11 it was, you know, a good hundred yards anyways  
12 away, maybe more.

13 Q. Between the building and the cove?

14 A. No. The cove and where -- where we saw  
15 it happening.

16 Q. So when you saw the -- the drums being  
17 emptied in Area 8, did that happen on the day you  
18 worked at D & S Screw Products?

19 A. It happened more than once because we  
20 used to play -- like I said, we used to play in  
21 the railroad cars. At 4:30 at night, between 4:30  
22 and 5:30 at night every day, that they pushed that  
23 in there.

24 Q. So what years did you observe that?

25 A. Okay. Let's see, '47. I was about 14,

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1 so it would be '57 --

2 Q. '61?

3 A. Yes, about '61.

4 Q. And was it just during that one year?

5 A. Like I said, we started getting older;  
6 we started not hanging around in those areas, so,  
7 you know, we didn't really pay much more  
8 attention. It might have still went on. I don't  
9 know. I mean, like I said, we are talking about  
10 stuff that we observed that was done on a  
11 day-to-day basis that nobody even questioned.

12 Q. Was there any other source of pollutants that  
13 you observed entering into the Woonasquatucket?

14 A. Besides the dead bodies? No.

15 Q. That was a joke?

16 A. Yes.

17 Q. Okay.

18 A. You haven't found any yet? I -- I can't  
19 remember anything else. Sorry about that.

20 Q. Did you observe any of the construction  
21 activities associated with Brook Village or  
22 Centredale Manor?

23 A. No.

24 Q. Okay.

25 A. No. I'm trying to think of the years.

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1 What years were they built?

2 Q. Our information is that Brook Village was  
3 built in, approximately, 1976 and Centredale Manor  
4 was built in, approximately, 1982 or '83.

5 A. Yeah, because I was living on House  
6 Street at the time.

7 Q. Do you know anyone who was associated with  
8 the construction of these buildings?

9 A. Associated? What do you mean  
10 "associated"? That actually built it?

11 Q. Right.

12 A. No.

13 Q. Or prepared the land for the building?

14 A. The only one I always -- I used to talk  
15 to would be Sal, Sal Mancini.

16 Q. And who is that?

17 A. That used to be the mayor of North  
18 Providence.

19 Q. And what would you discuss with him with  
20 regard to the buildings?

21 A. I used to make a joke of it with him,  
22 how they ever got the thing approved to be built  
23 in the first place.

24 Q. And what were your concerns with regard to  
25 building the buildings here?

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1           A.     The barrels, number one; this was  
2 wetland, as far as I know, number two. I just  
3 couldn't believe that they -- they built these  
4 buildings on this land after knowing that it was  
5 so polluted.

6           I mean you're talking about something that  
7 was -- this is a very small community where, you  
8 know, everybody knows each other. I mean you  
9 pass, you go through the window, I mean it's very,  
10 very close knit and everybody knew what this was  
11 and it was -- it was -- it was -- it was a joke.  
12 I mean it wasn't really a joke; it's not a joke  
13 but I'm just saying it was -- it was so -- it was  
14 such an atrocity, the whole mess from day one, you  
15 know, that I -- I was -- I just couldn't believe  
16 they built anything here.

17          Q.     How did he react to your comments?

18           A.     He laughed.

19          Q.     Was he aware of the drum activities here?

20           A.     Oh, I'm sure.

21          Q.     Do you know if complaints were made about the  
22 manufacturing activities or the drum activities at  
23 the time they were going on?

24           A.     I mean, now, I was a kid at the time. I  
25 mean I'm sure -- I mean I heard, you know, you

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1     only -- you don't really hear what you hear from  
2     your parents, but I mean I don't think anybody in  
3     this area wanted it to go on; it just went on,  
4     and, you know, and on and on and on, you know,  
5     until the -- I don't know if it was somebody  
6     stopped them to do it or they just went out of  
7     business. I don't really know the -- the -- the  
8     end result. I don't know how it stopped, you  
9     know.

10           Some people went out of business and that's  
11     the end of the thing or somebody said, "Okay. You  
12     can't do this anymore." I don't know about that.

13     Q.     Do you know if anyone, besides yourself,  
14     expressed concern about drums and drum activities  
15     and -- and the building of Centredale Manor and  
16     Brook Village?

17           A.     Yeah. My dad and I used to talk about  
18     it a lot but, unfortunately, he's not here no more  
19     but we used to talk about it a lot, you know.

20     Q.     Were there any community groups that  
21     expressed concern?

22           A.     Not that I know of. If there was, again  
23     being from Johnston, a community group in North  
24     Providence would get together here and they  
25     wouldn't -- they wouldn't -- it's not like today

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1 with communications so -- so great, you know, you  
2 can make a phone call, gee, you know.

3 I think if they did, it was from the North  
4 Providence side because this is where it really  
5 was. We were more viewing it than being it, if  
6 you know what I'm saying. I'm terrible in  
7 describing stuff but I'm doing the best I can.

8 MS. GARYPIE: You're doing a fine job.

9 Q. Is there any other information that you can  
10 think of that might help us to understand the type  
11 of hazardous waste we are seeing in the area or  
12 the cause of it?

13 A. I think the main cause is right -- right  
14 here; that was the main cause of it.

15 Q. When you say, "right here," what do you mean?

16 A. The -- the ground that we are on right  
17 now. To me -- like I said, from day one they  
18 built this place I was -- I couldn't believe  
19 because of seeing what I saw, the thousands and  
20 thousands of barrels.

21 There's probably millions of barrels. I  
22 don't have no idea. I have no idea. I probably  
23 count them of. Somebody said that they took some  
24 of the stuff out of here. That's what Sal told  
25 me. They already took all the barrels out of

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1 here, but I kept on saying to myself, "That's  
2 impossible; there was just too many of them."

3 And barrels to me, corrode and decay, and if  
4 you touch them, they are going to -- even if you  
5 could get to them, if you touch them, they'll  
6 probably disintegrate anyways, so the stuff that  
7 was in the barrels are probably into soil, which  
8 is in the water, which is the whole bit, you know.

9 But I mean the ground where we are on right  
10 now, and I mean this parking lot, this whole  
11 parking lot, starting from -- I'd say where the  
12 corner of that building starts --

13 Q. And when you say -- you mean the corner of  
14 Brook Village?

15 A. Brook Village. Is that what you call  
16 it, the building right here?

17 Q. Yes.

18 A. Okay. From there on, there's barrels  
19 buried here. I don't care what anybody says. I  
20 don't believe -- I can't believe that they took --  
21 it just took years and years to put in. That's  
22 what I'm trying to say. It took years and years  
23 to put in. How could it come out in a -- in a  
24 little project? And what did they do with them if  
25 they did take them out?

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1 Q. Is there any person -- can you give us the  
2 name of any person who would have information  
3 about operations or construction? And by "any  
4 person" I mean including friends of your parents,  
5 friends that you grew up with that observed these  
6 activities between '57 and '63 or anyone else who  
7 might have knowledge that we can talk to?

8 A. I do, but the persons don't want to get  
9 involved. I already talked to them about it.  
10 Because he -- he used to play -- we used to play  
11 down here together but he doesn't want to get  
12 involved but I told him he's stupid but --

13 Q. Did you ever observe drums floating down the  
14 river?

15 A. Yes.

16 Q. How often would that occur?

17 A. Once in a while I'd see them. It would  
18 be more, like I says, this is what I'm saying,  
19 this back end --

20 Q. Going back to Exhibit 1, would it be from the  
21 Area 5 that you've marked?

22 A. See, what's -- on this what's gaffing me  
23 up is that, at one point, this was water somewhere  
24 around here.

25 Q. So that the tailrace and the Woonasquatucket

1 would be --

2 A. Yeah. Somewhere in here this met and  
3 this is where we saw the barrels.

4 Q. So it may have been even further south --

5 A. Oh, yes.

6 Q. -- than what you've marked as 5?

7 A. Oh, yes.

8 Q. Would it be all the way down where the  
9 tailrace and the Woonasquatucket met?

10 A. This is only Steere Avenue, which is  
11 right here. So I mean you've got another hundred  
12 yards just for the parking lot and, then, you got  
13 trees there, and I believe that's where it opens  
14 up into a -- we used to go skating there; like a  
15 cove type of deal. Opens up -- the -- the  
16 Woonasquatucket River opens up down here further.

17 MS. GARYPIE: Okay. I'm going to break  
18 for just a minute.

19 THE WITNESS: Sure.

20 ( P A U S E )

21 THE WITNESS: Sometimes we used to take  
22 the barrels and make rafts out of them.

23 Q. I'm going to show you -- this is not marked  
24 as an exhibit but I'm going to show you an aerial  
25 photograph and the -- I'm going to read the label

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1 into the record. It's labeled in the lower  
2 left-hand corner: "Woonasquatucket River,  
3 Providence, Rhode Island. PIC 9901116S. Date  
4 flown: September 2, 1963. Source: ASCS. Frame  
5 No. 158. Approximate scale 1 inch equals  
6 185 feet."

7 Do you see -- do you see where the  
8 Woonasquatucket River appears on this aerial  
9 photo?

10 A. I'm assuming this is it right here.  
11 This is supposed to be the plant right here?

12 Q. Yes.

13 A. Okay. This is the Woonasquatucket  
14 River. The Centredale bridge, Route 44. I'm  
15 trying to think. What year is this?

16 Q. 1963. So this would have been two years  
17 earlier than Exhibit 1, which is the map we've  
18 been referring to.

19 Now, you'll see on this aerial photo that  
20 the -- the tailrace extends all the way down to  
21 where it meets the Woonasquatucket River --

22 A. That's what I was talking about.

23 Q. -- which does not appear on Exhibit 1?

24 A. Correct. Correct.

25 Q. And you've marked Area 5 here as just below

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1 where the buildings stop on the aerial photo?

2 A. Uh-huh. This is what I'm -- this has to  
3 be George Waterman Road. Let me see how many  
4 streets there is. There's one, two, three -- I'm  
5 trying to figure out where Amber Street is now.  
6 Now, is this Rhode Island Ave, the cemetery?

7 Q. Take your time.

8 A. This -- I'm -- I'm going to say this  
9 looks like Edna Street, and I would say this could  
10 be Amber Street because this -- okay -- this is  
11 Vacca, Brayton. Let me see -- there's one other  
12 one.

13 This is Amber; this must be Edna, and South  
14 and North Street. So, as I say, if this is true,  
15 this -- this is the street -- okay -- let me see  
16 if my house is on this street. That looks like  
17 Morra's house; Morra, the name of the people who  
18 used to live there.

19 This is my grandmother's house and that was  
20 our house, if that's -- if this is true. So we  
21 would -- if you see right here, that's what we --  
22 that's where we came in. Remember I said to you,  
23 you know --

24 Q. It appears that at the end of the street that  
25 you're identifying as Amber, there's a small

1 trail --

2 A. Right.

3 Q. -- leading to the river?

4 A. Right. Exactly.

5 Q. And if we look -- if we look at where the  
6 trail meets the river, where would Area 5 be on  
7 the aerial photograph? Would that be directly  
8 across?

9 A. Directly across the street, across the  
10 water.

11 Q. And if we go -- and so that's just south of  
12 the -- the most southern Metro-Atlantic building,  
13 correct?

14 A. Correct.

15 Q. And if we go even further south, which on the  
16 aerial photo you start to see trees and you start  
17 to see the area where the tailrace meets the  
18 Woonasquatucket --

19 A. Right.

20 Q. -- did you ever observe drum or excavation  
21 activities in that area starting where you see the  
22 trees beginning at the south and moving in where  
23 the tailrace and the Woonasquatucket meet?

24 A. Okay. As I said before, we couldn't see  
25 that from where we are; we couldn't see this

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1 activity here.

2 Q. Okay. So really you could see directly  
3 across from where the trail --

4 A. Right.

5 Q. -- meets the -- the Woonasquatucket?

6 A. Right. If you told me -- Remember when  
7 I told you about the tree lines before?

8 Q. Yes.

9 A. This is the tree lines I was talking  
10 about, and this is where the activity is that we  
11 used to see or hear the tractors and stuff at  
12 night.

13 Q. So would you say, then, that the area that  
14 you have marked as 5 --

15 A. 5.

16 Q. -- on Exhibit 1 is correct?

17 A. I would say 5 would be exactly where I  
18 had said the activity was. If I put this 5 right  
19 on top of this, this is the whole area right  
20 there, but I don't see -- I still don't see this  
21 house.

22 Q. And when you say, "this house," are you  
23 referring --

24 A. The building you're talking about.

25 Q. The building to the left of what you've

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1 marked as 7?

2 A. Right. So I mean that's what I'm  
3 saying, I don't really -- even in the photo, it  
4 doesn't show anything here on top, on the water  
5 like that.

6 MS. GARYPIE: Okay. I think that unless  
7 there's anything else that you think may be  
8 important to tell us about, we may be through.

9 THE WITNESS: Well, to be -- to be  
10 honest with you, a lot of the people -- and, like  
11 I said, I don't want to get anybody -- people who  
12 don't want to get involved involved, but this is  
13 the environment that we are talking about; it  
14 affects not only us but our kids, and that's what  
15 I'm upset about because this should have been  
16 stopped a long time ago, but a lot of the people  
17 who live in this area -- and I'm not going to say  
18 where -- but in this area right here, they still  
19 live there, and they've lived there since this --  
20 this incident occurred so --

21 Q. Since you -- since you moved there in 1956?

22 A. Correct. And I'm trying to look at the  
23 church here. This is where -- this is where --  
24 this is the Saint Lawrence School, so it's up a  
25 little further. That looks like the school.

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1 MS. GARYPIE: Okay.

2 THE WITNESS: All right?

3 MS. GARYPIE: I think we are done.

4 Thank you very much.

5 THE WITNESS: All right. Great. I hope  
6 I helped you.

7 MS. GARYPIE: You helped us a great  
8 deal.

9 (Adjourned at 2:55 p.m.)

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2       KENT, Sc.

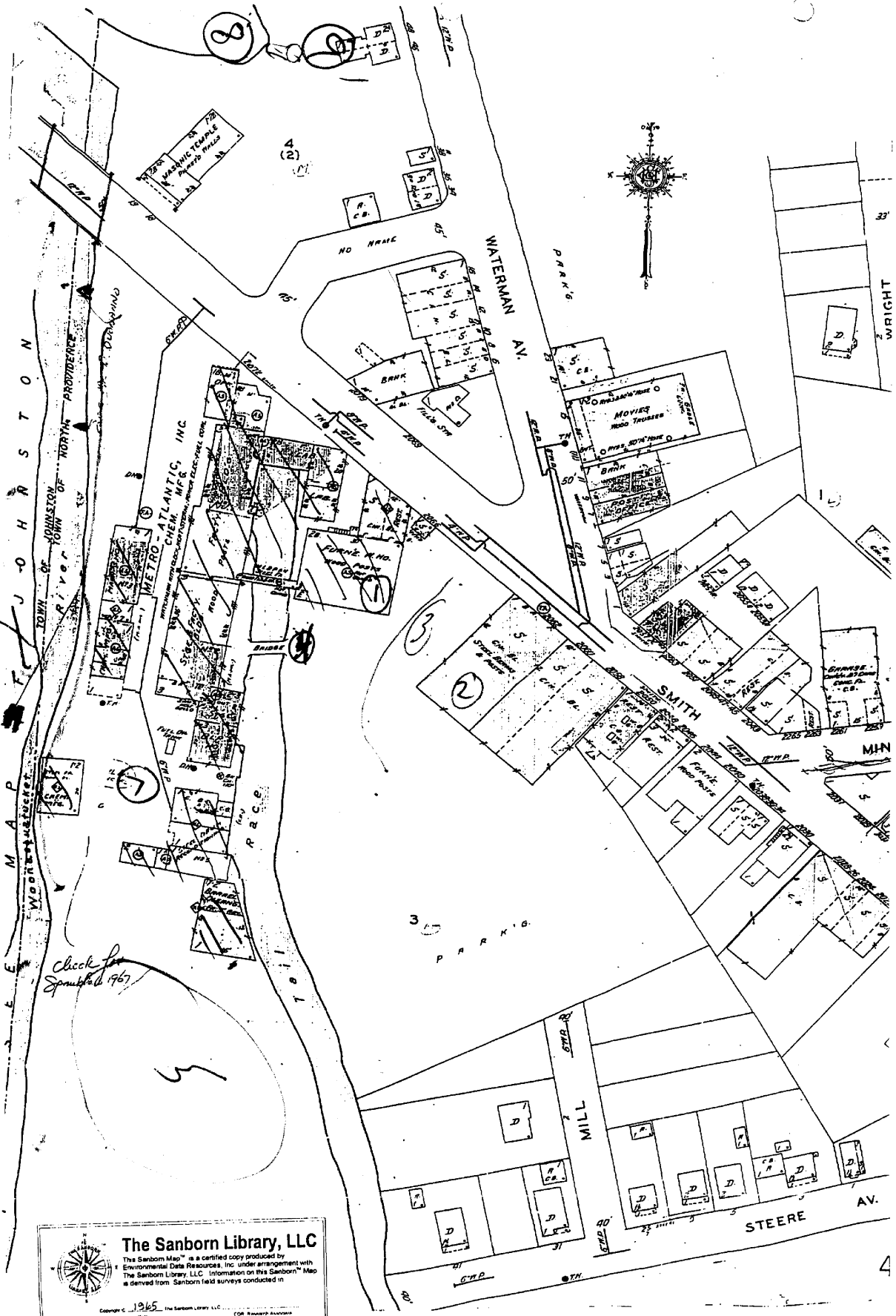
3  
4                   C E R T I F I C A T I O N

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 July, 1999.

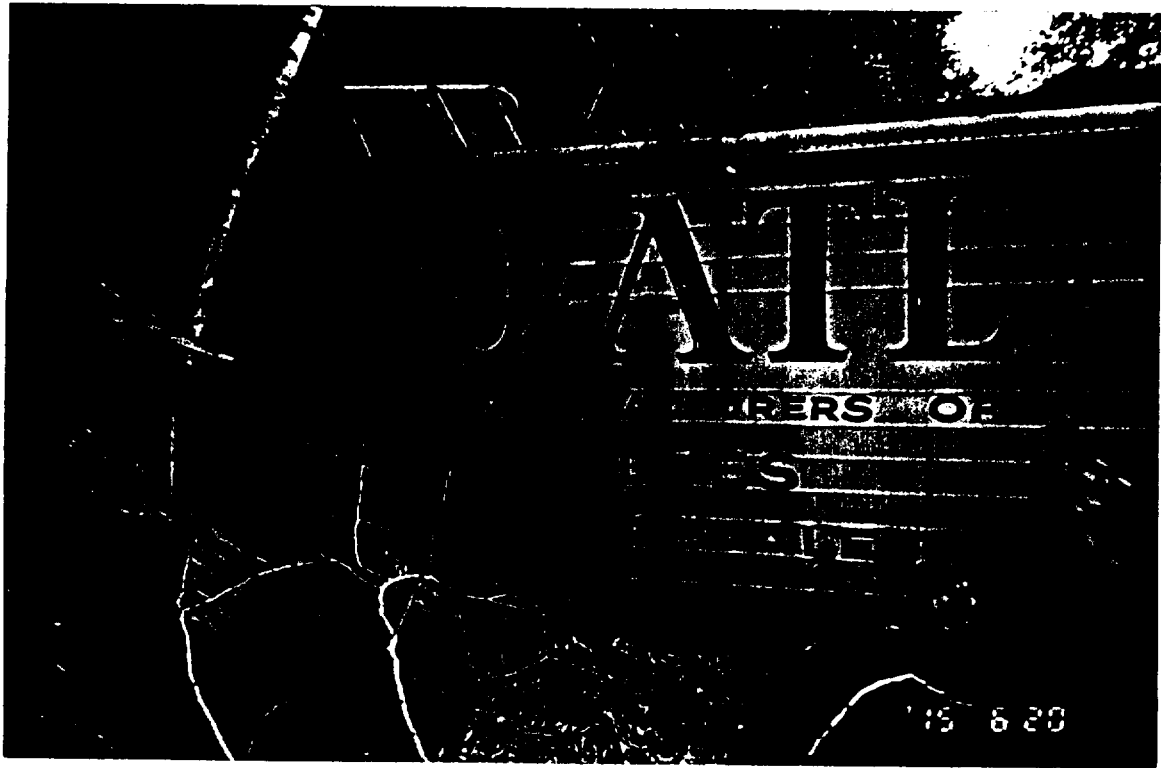
19  
20  
21                   *V. Dafoulas*  
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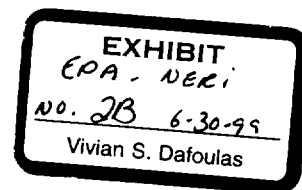


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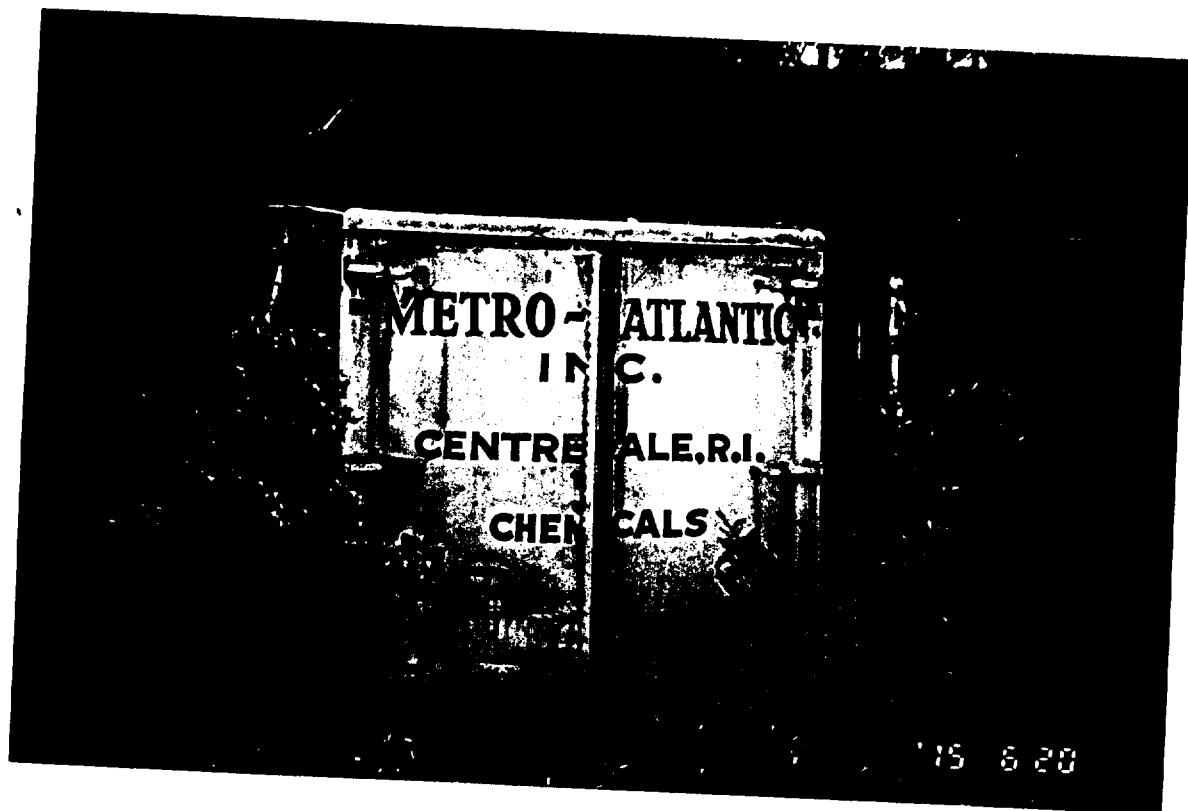


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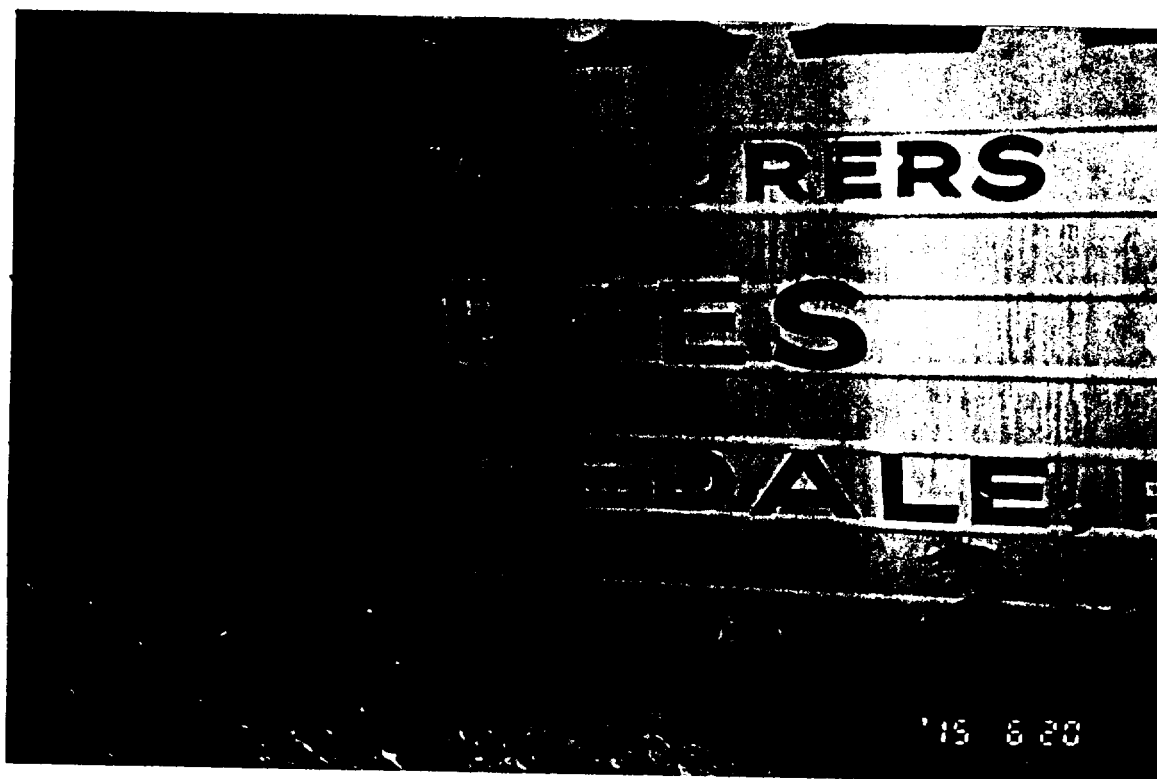


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