

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

EMHART INDUSTRIES, INC., :  
Plaintiff/Counterclaim Defendant :  
 :  
VS. :C.A. 06-218-S  
 :  
NEW ENGLAND CONTAINER COMPANY, :  
INC., PROVIDENCE WASHINGTON :  
INSURANCE COMPANY and TRAVELERS :  
CASUALTY & SURETY COMPANY, :  
Defendants/Counterclaim Plaintiff:

CONSOLIDATED

EMHART INDUSTRIES, INC., :  
Plaintiff/Counterclaim Defendant :  
 :  
VS. :  
 :  
UNITED STATES DEPARTMENT OF THE :  
AIR FORCE, et al. :  
Defendants/Counterclaim :  
Plaintiffs and :  
Third-Party Plaintiffs :  
 :  
VS. :C.A. 11-023-S  
 :  
BLACK & DECKER, INC., :  
Third-Party Defendant and :  
Counterclaim Plaintiff :

Deposition of GORDON SPARADEO, a Witness  
herein, taken on WEDNESDAY, JUNE 5, 2013, 10:00  
A.M., at the offices of DUFFY & SWEENEY, LTD, 1800  
Financial Plaza, Providence, Rhode Island, before  
Vivian S. Dafoulas, RMR/CRR.

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1 GORDON SPARADEO,  
2 having been first duly sworn, was deposed and  
3 testified as follows:

4 COURT REPORTER: Would you state your  
5 name, please.

6 THE WITNESS: Gordon Sparadeo,  
7 S-P-A-R-A-D-E-O.

8 EXAMINATION

9 BY MR. BAUER:

10 Q. Good morning, Mr. Sparadeo. Thank you  
11 for being here.

12 A. Good morning.

13 MR. BAUER: It has been our fashion that  
14 we go around and all introduce ourselves once we  
15 are on the record and let you know who we are  
16 representing so we'll do that again today.

17 My name is Scott Bauer. I'm with the  
18 United States Department of Justice and I'm  
19 representing the United States in this matter.

20 MR. CURLEY: My name is Michael Curley  
21 and I'm with the U.S. Environmental Protection  
22 Agency.

23 MR. RAY: My name is Jim Ray and I  
24 represent New England Container Company.

25 MR. PIROZZOLO: And I'm Jack Pirozzolo

1 and I represent Emhart.

2 BY MR. BAUER:

3 Q. And the reason we're here today is an  
4 environmental case, a civil environmental lawsuit  
5 involving what's known as the Centredale Manor  
6 site and it's the site on which New England  
7 Container Company and Metro-Atlantic operated  
8 years ago. Those may be names that you are  
9 familiar with.

10 A. Yes. Uh-hum.

11 Q. Currently it's the location of the  
12 Centredale Manor and Brook Village apartment  
13 buildings.

14 A. Yes.

15 Q. Before we get into the substantive  
16 questions, I just want to give you a couple of  
17 instructions about how the deposition works.

18 Have you ever been deposed before?

19 A. Well, I -- I was talked to by a private  
20 detective on this case. He came to the house  
21 twice.

22 Now, I don't know what that -- you know, he  
23 didn't swear me in or anything; he just asked me  
24 questions and I answered them, you know, to the  
25 best of my ability.

1 Q. Have you ever been in this sort of  
2 setting where you are sworn in --

3 A. No.

4 Q. -- and there is a court reporter  
5 taking --

6 A. No.

7 Q. Well, because we have a court reporter  
8 taking down everything that everybody says,  
9 there's a couple of things to keep in mind. One  
10 is that it works best if we all avoid talking over  
11 one another, so I'll try to make sure I've waited  
12 until you've finished answering any questions that  
13 I ask.

14 A. Uh-hum.

15 Q. And if you could make sure that I've  
16 finished my question before you start to answer,  
17 it will make things go a lot more smoothly.

18 Similarly it's difficult for the court  
19 reporter to take down nonverbal responses like  
20 shaking your head or nodding your head, so if you  
21 could say a clear yes or no to any questions, I  
22 would appreciate it.

23 A. Okay.

24 Q. I'd ask -- and I'm sure all counsel will  
25 appreciate this -- that you make sure you

1 understand any questions you are asked before you  
2 answer it.

3 If you need any elaboration or you need me to  
4 reword the question in any way, please feel free  
5 to say so before you give an answer. I'll assume,  
6 if you've given an answer, that you understand the  
7 question, okay?

8 A. Okay.

9 Q. We can take a break anytime you want to,  
10 so if you get tired or want to stretch your legs  
11 or want to get a glass of water or whatever, just  
12 say the word and we'll take a five-minute break  
13 and then come back when you are ready.

14 And, finally, let me ask you if there is  
15 anything that we should know about that would --  
16 that prevents you from being able to testify  
17 truthfully and accurately today.

18 A. No. No.

19 MR. BAUER: Excellent. I'm going to  
20 mark the first exhibit.

21 (Whereupon, Sparadeo Exhibit No. 1 was  
22 marked.)

23 Q. I'm handing you what's been marked  
24 Sparadeo Exhibit 1. Do you recognize this  
25 document? You may have received a copy of it.



1           A.    Hold on.  This is -- yeah.  Okay.  This  
2 is what I was served.

3           Q.    This is the reason you are here today is  
4 in response to the subpoena, correct?

5           A.    Okay.  Yes.

6           Q.    When you were served with the subpoena,  
7 did you have any conversation with the person who  
8 gave it to you?

9           A.    Yes.  I asked him what it was about and  
10 he said all my job is to serve the subpoena and he  
11 handed it to me and I signed for it and that was  
12 it.

13           He told me there was a number right here to  
14 call if I wanted information on it, which I did.

15           Q.    And when you called that number, what  
16 conversation did you have with whoever you spoke  
17 to?

18           A.    Just asked them what it was about and  
19 they told me that it was about the Atlantic -- the  
20 chemical company.

21           Q.    Okay.

22           A.    That was it.  That's all, you know.

23           Q.    Okay.  Thank you.  What is your current  
24 address?

25           A.    [REDACTED] North Providence,

1 Rhode Island.

2 Q. And how long have you lived there?

3 A. Thirty-seven years.

4 Q. And have you lived in other locations in  
5 the Providence area?

6 A. Yes. Yes.

7 Q. Where else have you lived?

8 A. I lived in -- let's see -- well, going  
9 back to the fifties I guess I lived on [REDACTED]  
10 [REDACTED] which is in Centredale, North Providence,  
11 and then I moved to Glocester for approximately 10  
12 years and then moved back to North Providence.

13 Q. And how close to the -- what's known as  
14 the Centredale Manor site were any of those  
15 addresses?

16 A. Both of those were within a mile.

17 Q. What is your birth date?

18 A. [REDACTED] 27.

19 Q. Can you tell me what your current  
20 occupation is?

21 A. Retired.

22 Q. Congratulations. Prior to retirement  
23 where did you work?

24 A. Oh, my God, my work record, I had 30  
25 years as a meat cutter with A & P and then they

1 closed all the stores in Rhode Island. I was  
2 fifty years old and I got laid off and then I  
3 started working in machine shops.

4 I worked in several machine shops. I ended  
5 up in Aerospace which is up on Waterman Avenue.  
6 Mostly machine shop work after I got out of the  
7 meat-cutting profession.

8 Q. And then you retired from that?

9 A. And then I retired which is -- I'm in --  
10 right now I'm in my 25th year of retirement.

11 Q. Again, congratulations. Was there a  
12 time that you worked for the Centredale Fire  
13 Department?

14 A. Well, that was volunteer now. That was  
15 strictly a volunteer company at that time.  
16 They're all paid men now but I was -- at the time  
17 this stuff was going on, I was mostly -- I was a  
18 captain and I was like deputy chief, and a lot of  
19 the fires I was in charge of, you know, because  
20 the chief was out of town a lot.

21 Q. Okay.

22 A. So that put me in a -- you know, mostly,  
23 you know, I ran a lot of fires that were there,  
24 you know.

25 Q. What years did you work for the fire

1 department?

2 A. Oh, I joined the fire department in 1943  
3 before I went in the Navy. I went in the Navy in  
4 1944, came back in '46 and was active in the fire  
5 company until, oh, let's see, about '63.

6 Q. Okay. And then after --

7 MR. PIROZZOLO: 1963?

8 THE WITNESS: Yes.

9 BY MR. BAUER:

10 Q. After 1963 --

11 A. I moved out of -- that's when I moved to  
12 Gloucester so I -- I had to leave the -- I had to  
13 leave the active role. I stayed in the fire  
14 department. In fact, we still have membership now  
15 but I couldn't serve active because I lived in  
16 Gloucester.

17 Q. And did you ever serve actively again in  
18 the fire department --

19 A. No.

20 Q. -- after that date?

21 A. No. Well, after that they started the  
22 paid department, you know.

23 Q. Okay.

24 A. A little at a time they grew, you know.  
25 They started with 10 men and then they kept --

1 every year they kept adding. Now it's a full-time  
2 paid department. They got about 100 men --

3 Q. Okay.

4 A. -- in North Providence.

5 Q. Okay. And you mentioned that at least  
6 one of your positions was captain, I believe --

7 A. Yes.

8 Q. -- and assistant chief?

9 A. Yes.

10 Q. Did you have any other positions with  
11 the fire department during your time there?

12 A. Well, I was a training officer. You  
13 know, I ran the training program. Other than  
14 that, it was just generally, you know, fire  
15 department work, you know.

16 Q. And during your time with the Centredale  
17 Fire Department did you ever visit the site of the  
18 Metro-Atlantic and New England Container Company  
19 operations?

20 A. Oh, yeah. I mean did we have fires  
21 there? Is that what you're asking?

22 Q. Did you have fires there or were there  
23 any other reasons for you to have visited the  
24 site?

25 A. No. Generally speaking, no. Just

1 whenever we were called to a fire, yeah.

2 Q. Were you called to fires at that  
3 property?

4 A. Oh, yeah. We had several. I don't --  
5 I'm not going to be able to tell you how many. We  
6 had -- we didn't have any major fires in the  
7 chemical plant itself.

8 We had one major fire in the barrel shop  
9 which was separate from the -- the -- the chemical  
10 plant was in the old mill complex and when you  
11 drove into the driveway, the mill was on the left  
12 and the barrel shop was on the right.

13 They had a big building there for the barrel  
14 shop and they did -- I don't know what they did  
15 inside but they did their barrel -- they cleaned  
16 barrels and refurbished them. That was outside.

17 That's where they, I believe, they did the  
18 damage because they were doing -- you know, they  
19 had barrels that had chemicals in them and they  
20 would clean them. This -- this barrel shop, they  
21 refurbished the barrels, they sandblasted them,  
22 straightened them out and then they repainted  
23 them, made a new barrel out of an old barrel, so a  
24 lot of them had chemicals in them. They used to  
25 just dump them on the side of the river.

1 MR. BAUER: Let's mark an exhibit so  
2 that maybe you can indicate where some of this  
3 activity took place.

4 (Whereupon, Sparadeo Exhibit No. 2 was  
5 marked.)

6 Q. I'm showing you what's been marked  
7 Sparadeo Exhibit No. 2. And for the record it's  
8 the 1965 Sanborn map that we've been using in a  
9 number of depositions.

10 If you could locate on this map where the  
11 chemical company was that you were talking about  
12 and where the barrel processing operation was that  
13 you were talking about.

14 A. Let's see -- okay. This is the old  
15 mill.

16 MR. PIROZZOLO: Excuse me. Is the  
17 witness going to read that upside down?

18 MR. BAUER: That's a good point.

19 MR. PIROZZOLO: I mean it would be  
20 easier -- we're all familiar with it but it may be  
21 easier for him to --

22 MR. BAUER: And this is the right  
23 orientation anyway. Face the witness north to  
24 south.

25 Q. To orient you, you see where Smith

1 Street is?

2 A. Yes.

3 Q. And also the Woonasquatucket River?

4 A. Yes. This is the river here. Okay.

5 This is the -- this is the barrel shop here.

6 Q. Okay.

7 A. It looks like to me that's right coming  
8 in the driveway, the mill is on the -- coming in,  
9 the mill complex is on the left. This was  
10 furniture storage over here. It had nothing to  
11 do -- I don't think it had anything to do with  
12 Metro.

13 This is the factory here and this is the  
14 barrel operation here. We had a major fire in  
15 this building here. We only had a couple of minor  
16 fires that I can recollect in the mill complex,  
17 you know.

18 We were very -- we instructed all our men to  
19 be very careful. We went in with a mask. We  
20 instructed everybody not to roam around in there  
21 if they couldn't see because they had vats in the  
22 floor, and if you stepped in those, you didn't  
23 know what you were stepping into.

24 It was chemicals, you know, and we didn't  
25 really, you know, as volunteer firemen, we



1 didn't -- you know, we don't have any expertise  
2 in, you know, as far as chemicals is concerned.  
3 We just stayed away from them.

4 We instructed our men to, you know, to be  
5 very, very careful if they went in there. We only  
6 had a couple of minor fires in the building there.  
7 This is -- this was -- the major fire was in --  
8 was in the barrel shop.

9 Q. If I could, if I could direct your  
10 attention to a group of buildings that's further  
11 south and more on the left-hand side than the  
12 buildings you've indicated, is it possible that  
13 those buildings were the location of the barrel  
14 shop you referred to, these buildings down here?

15 A. This I -- I can't remember what was down  
16 there. We never had any -- we never had any  
17 problems down there that I can remember, that I  
18 can recollect, you know.

19 Now, I don't know -- I really couldn't tell  
20 you what was there. This was the area that we,  
21 like I said, we had a major fire in here in this  
22 building here and I was -- I knew -- I could see  
23 the operation there, you know, and down here I  
24 really -- I couldn't tell you.

25 Q. Okay. Why don't -- could I have you

1 circle the building that you indicated there was a  
2 major fire?

3 A. Well, from what I can see here, I can  
4 assume this here. (Indicating.)

5 MR. BAUER: Okay. Let the record  
6 reflect the witness has circled in blue the  
7 building that he recalls there being a major fire.

8 Q. During the time that you were on the  
9 site -- strike that.

10 You said that you thought you were on the  
11 site several times but couldn't remember an exact  
12 number of times?

13 A. No. No. I couldn't tell you.

14 Q. To the best of your recollection, can  
15 you give a range of the number of times you may  
16 have been on the site?

17 A. Six, seven, eight maybe.

18 Q. And were each of those occasions because  
19 of a fire on the site?

20 A. Yeah, yeah. It was, yeah, small, you  
21 know, small jobs, you know, nothing -- nothing --  
22 this was the only major fire. Other than that,  
23 you know, they had just little things that they  
24 called us in, you know, to be safe, you know.

25 Q. And what would these little things have

1 consisted of?

2 A. Just minor -- they had problems and they  
3 called us to make sure that, you know, that  
4 they -- they didn't spread, you know. Small  
5 fires, you know.

6 Q. Okay. Did any of them involve drums?

7 A. No. No. I can't remember any drums --  
8 actual drums burning except in the barrel shop.  
9 That was, like I said, everything was burned in  
10 there.

11 Q. And what was the nature of the big fire  
12 that you said you were called in for?

13 A. It was in the barrel shop. The whole  
14 shop was burning. The whole shop was engulfed in  
15 fire, you know, the interior.

16 Q. And it's your recollection that that was  
17 the barrel shop --

18 A. Yes.

19 Q. -- and not the Metro-Atlantic Chemical  
20 plant?

21 A. No. No. It was in this building here.  
22 It wasn't in the chemical building, in the mill.

23 Q. During your time on the site, did you  
24 see any drums?

25 A. Oh, yeah.

1 Q. Around the property?

2 A. Oh, yeah. They were all over the place.

3 Q. Do you have any estimate of the number  
4 of drums?

5 A. Oh, God, they used to come in by  
6 truckloads. They used to come in by truckloads,  
7 big truckloads of barrels.

8 Q. So do you know about how many?

9 A. No. I would say that operation, they  
10 worked on barrels constantly there. I mean there  
11 was, you know -- I've seen -- you know, I remember  
12 seeing truckloads of barrels going in, you know --

13 Q. Okay.

14 A. -- and going, you know, guys in and out  
15 because they refurbished barrels every day.

16 Q. Okay. And do you remember where on the  
17 property you saw barrels located?

18 A. Oh, in this section here. Oh, yeah.  
19 Yeah. This -- this -- they were all over the  
20 place here.

21 Q. Can you use the pen that I've given you  
22 to write "Drums" in the vicinity of where you saw  
23 drums?

24 A. Well, I would say -- yeah, all this --  
25 all this section here is where you'd find drums,

1 you know. All around here.

2 Like I said, I never did go down into this  
3 area. I had no reason to go there.

4 Q. You are indicating further south on the  
5 map?

6 A. Yeah. I mean yeah. I had no reason,  
7 you know, to go there. I just went in there when  
8 we had an actual call and that was it. We did our  
9 business and we got out, you know.

10 Q. Okay. Do you recall in what manner the  
11 drums were stored that you saw on the site?

12 A. They were -- they were just -- they were  
13 just all over the place. That barrel shop was  
14 loaded with them and they were, you know, on the  
15 ground. You'd see them all over the place. In  
16 fact, if I wanted a barrel, that's where I went to  
17 get a barrel to get a rubbish burner.

18 Q. What was the condition of the barrels,  
19 if you remember?

20 A. All kinds of conditions. Everything. I  
21 mean you'd see them all -- some were fairly  
22 decent, some were real crappy. And that's what  
23 they did. I mean they took an old rusted barrel  
24 and this machine they had, it rotated it, it  
25 straightened them out, it sandblasted them and,

1     like I said, it was -- whatever chemicals they  
2     had, they'd just dump on the side of the river and  
3     that was it. That was the operation.

4           Q.    Do you remember seeing any barrels that  
5     were leaking?

6           A.    No. I can't say that I saw a barrel  
7     that was leaking but I saw barrels that had stuff  
8     in them. What it was, I have no idea.

9           Q.    Okay. But you did see barrels that had  
10    contents --

11          A.    Oh, yes.

12          Q.    -- in them?

13          A.    Oh, yeah.

14          Q.    Do you recall how full the barrels were?

15          A.    Mostly very little on the bottoms, you  
16    know.

17          Q.    Okay. Do you recall any markings on any  
18    of the drums?

19          A.    No. No, I never paid attention to them,  
20    no.

21          Q.    Do you recall any -- were they different  
22    colors?

23          A.    Oh, yeah. Yeah. Yeah.

24          Q.    What were some of the different colors  
25    of the drums?

1           A. All I can tell you is they were, you  
2 know, they weren't all the same. They were  
3 different, you know, all of them but I didn't pay  
4 attention to them. I had no reason to.

5           Q. Okay. Did you see any other debris of  
6 any kind around the site?

7           A. Well, it was generally not a well-kept  
8 area. I mean it was kind of -- kind of messy, you  
9 know. It was -- I don't know how to put it. You  
10 know, it wasn't -- it wasn't neat and clean; it  
11 was just a messy operation.

12           And that's what they were doing. It was a  
13 messy operation, cleaning barrels and sandblasting  
14 them and repainting them and, you know, it's a --  
15 I didn't have any reason to question anything. I  
16 knew a lot of people that worked there.

17           Q. And can you elaborate a little bit on  
18 messy? What was it that you saw that --

19           A. Well, just generally, you know, it  
20 wasn't a neat operation in other words. It was --  
21 that's the reason I -- that's -- I think that's  
22 the reason they had it outside was because of the  
23 type of operation it was, you know.

24           It wasn't something you'd want inside a  
25 building because it was kind of a messy operation

1 so they did it outside. That's what I'm thinking.

2 Q. Do you remember anything about the  
3 chemical company's operations?

4 A. No. I have no knowledge of chemicals.  
5 I don't know what they had in there.

6 I know they had a lot of different chemicals  
7 and we were warned, you know, to stay away as much  
8 as we could.

9 Like I said, they had -- when you went in the  
10 main floor, they had vats, big ones. I mean they  
11 went down one floor. They were big, big vats and  
12 we stayed away from them.

13 Q. Do you recall seeing any spills  
14 associated with the chemical company's operation?

15 A. No. No. I never had any occasion to  
16 see any of that stuff, no.

17 Q. Did you see any stained soil at the  
18 site?

19 A. Oh, yeah. Where they -- where the  
20 barrel operation was, oh, yeah. You could tell.  
21 You could tell they were, you know, dumping stuff  
22 there.

23 Q. Do you recall seeing any stained soil  
24 around the chemical company's operations?

25 A. Not -- no. Just in this area here on



1 the river here. That's the only, you know, the  
2 only place I had reason to be there, you know,  
3 when we had a call. Other than that, what  
4 happened in the mill and what happened over here,  
5 I have no recollection of that.

6 Q. Do you recall ever seeing any  
7 discoloration in the river itself?

8 A. I really -- no. I didn't check the  
9 river. We didn't have any reason to, you know,  
10 but like I said, they were dumping stuff on the  
11 banks, I knew that, you know.

12 Q. Did you smell any odor on the site?

13 A. Oh, yeah. Oh, yeah.

14 Q. What did it smell like?

15 A. I don't know. It was -- you could smell  
16 the chemicals, you know. What -- I couldn't  
17 describe anything other than, you know, you're  
18 smelling different stuff, you know.

19 Q. Okay. Did you see any pipes leading  
20 from any of the buildings into the river?

21 A. No. No, I didn't.

22 Q. And did you ever, looking at the map, go  
23 further south on the site beyond where the  
24 southernmost buildings were located?

25 A. No. No, I did not.

1 Q. Did you ever see any vehicles that were  
2 labeled at the site?

3 A. What they had -- they had trucks you  
4 mean?

5 Q. Yes.

6 A. Atlantic Chemical trucks.

7 Q. Did you see chemicals that were labeled  
8 Metro-Atlantic?

9 A. Oh, yeah. Oh, yeah. In fact, I had two  
10 guys I grew up with that drove them, drove for  
11 them.

12 Q. And were these trucks that were labeled  
13 Metro-Atlantic for the chemical company or were  
14 they labeled New England Container?

15 A. Oh, I think I've seen both there, New  
16 England Container and Metro.

17 Q. Do you remember what the trucks were  
18 carrying?

19 A. No. In fact, when I worked for a while  
20 at Brown & Sharpe, which is up the road, the next  
21 mill up the road, I worked for them and they used  
22 to deliver chemicals to Brown & Sharpe.

23 I remember one of the guys I grew up with, he  
24 delivered one day and I was talking to him. I  
25 don't even know what it was. It was a barrel of

1 chemicals that Brown & Sharpe had bought from  
2 Metro and I have no idea what it was.

3 Q. And who was this person that you grew up  
4 with that was delivering chemicals?

5 A. His name was Palumbo, Felix Palumbo. I  
6 don't know if you have him listed.

7 Q. It's possible.

8 A. He was -- well, he's dead anyway.  
9 You're not going to talk to him. In fact all the  
10 guys that -- all the guys I knew that worked in  
11 that place, they're all dead now.

12 Q. Who were some of the people that you  
13 knew that worked there?

14 A. There Felix Palumbo, there was Angelo  
15 Carbone and there was two Murphy brothers.

16 Q. Two, I'm sorry?

17 A. Two brothers by the name of Murphy. One  
18 worked -- one worked days and one worked nights on  
19 the -- he was a watchman at night. I think his  
20 name -- the guy that worked days was Walter  
21 Murphy. His brother's name I can't recall his  
22 first name but anyway he worked on -- he was a  
23 night watchman.

24 Q. Okay. Any other names of people that  
25 worked there?

1           A.    I'm trying to think.  There was a guy  
2    from -- a guy from Allendale.  Taylor, I think his  
3    name was Taylor.  I knew him slightly.  He wasn't  
4    one, you know, I hung around with but he worked  
5    there as a driver too.

6           Q.    Okay.

7           A.    But all these guys I mentioned, you're  
8    not going to question them.  They're long gone.  
9    I'm -- I'm one of the old guys left.

10           MR. BAUER:  Okay.  I'm going to mark  
11   another exhibit.

12                   (Whereupon, Sparadeo Exhibit No. 3 was  
13   marked.)

14           Q.    I'm handing you what's been marked  
15   Sparadeo Exhibit No. 3.  Please take a look at  
16   this document and let me know if you recognize it.

17           A.    Looks like it's about what I said.

18           Q.    Is that your signature at the bottom?

19           A.    Yes.  Yes.

20           Q.    You mentioned that you spoke to a couple  
21   of people about this matter.  Did one of them have  
22   you sign this affidavit?

23           A.    Yeah.  This is -- he came to the house.  
24   Private detective as far as I can remember.  
25   That's what he said he was.

1 Q. Okay.

2 A. He was working for the EPA I guess. I  
3 don't know. He told me but I can't remember now.

4 Q. Okay. Is this your handwriting?

5 A. No. No. That's his.

6 Q. So he wrote the affidavit and you signed  
7 it?

8 A. Yeah. Yeah.

9 Q. But is the contents of the affidavit  
10 accurate?

11 A. The contents is, as far as I can make  
12 out here, it's pretty well, you know, what I just  
13 repeated, you know.

14 MR. BAUER: Okay. Thank you.

15 (Whereupon, Sparadeo Exhibit No. 4 was  
16 marked.)

17 Q. I'm handing you what's been marked  
18 Sparadeo Exhibit No. 4. Do you recognize this  
19 document?

20 A. Yeah, that's a fire report.

21 Q. Are these reports something that the  
22 Centredale Fire Department would routinely fill  
23 out anytime they got a call?

24 A. Every call we filled one of these, yeah.  
25 Every alarm.

1 Q. Is this document something that the fire  
2 department kept in the ordinary course of its  
3 business?

4 A. Yes. I don't know, you know, how good  
5 the records are, you know, today but we kept them  
6 for a long time.

7 Q. Do you remember the particular incident  
8 that's discussed in this document?

9 A. Let's see --

10 (Witness perusing document.)

11 A. Uh-hum. I don't remember the fire but I  
12 can see what it is now. They had a -- like I  
13 said, the junk dumped around there and I guess  
14 they had a fire that was smoky and it was causing,  
15 you know, problems around the neighborhood and  
16 they asked us to go down and put it out and I  
17 would say this wasn't a -- it wasn't a major fire.  
18 It was just a smoldering affair, you know, and we  
19 just more or less had to pump some water on it and  
20 clean it up. That's it.

21 We pumped for 45 minutes, we pumped from the  
22 river, and that's it. And this, I -- I signed --  
23 I filled this out and this is my crew that were  
24 here. That's the driver listed and I answered the  
25 call and I was in charge of it so...

1 Q. Do you remember where the dump is that's  
2 referred to in this document?

3 A. It was in -- behind where the barrel  
4 operation was. It was all in this section here.

5 Q. Would you mind writing "Dump" on the  
6 portion of the map that --

7 A. Well, as far as I can recall, I would  
8 say I'd put it in here.

9 MR. PIROZZOLO: I'll ask him to do it in  
10 red.

11 THE WITNESS: As far as I can remember.

12 MR. PIROZZOLO: It shows up better than  
13 the blue.

14 MR. BAUER: Why don't you ask him that  
15 when you ask him questions?

16 MR. PIROZZOLO: Okay.

17 (Whereupon, Sparadeo Exhibit No. 5 was  
18 marked.)

19 Q. I'm handing you what's been marked  
20 Sparadeo Exhibit No. 5. This is a -- for the  
21 record, this is an aerial photograph of the site  
22 dated 1965.

23 I'm wondering if you could look at that  
24 aerial photograph and between it and the Sanborn  
25 map, orient yourself towards where the dump may

1 have been that you were referring to.

2 MR. PIROZZOLO: Objection.

3 A. Let's see -- I can't even figure this  
4 out yet.

5 Q. You can see where the --

6 A. This is the river?

7 Q. You can see where the river is running  
8 north and south.

9 A. This is the river? Okay.

10 Q. This is Smith Street running diagonally  
11 across the top.

12 A. This is the mill here. This is the  
13 mill. This is the barrel shop. It would be in  
14 this area right here.

15 Q. If you look --

16 A. They just -- you know, what they used to  
17 do is throw a lot of rubbish there, you know, and  
18 it accumulated and a couple of times it just  
19 caught fire and we'd go down and put it out.  
20 That's it.

21 Q. If you look further south on the  
22 photograph that's been marked Exhibit 5, do you  
23 see -- does that help you see where the dump area  
24 may have been located?

25 A. Well, as far as I can remember, we never



1       went too far down so that would be in this area  
2       right here. This is the barrel shop here and the  
3       operation was here and --

4               MR. PIROZZOLO: I'll ask the witness to  
5       mark what he's pointing to.

6               MR. BAUER: You can ask him during your  
7       questioning.

8               MR. PIROZZOLO: No. He's pointing to --

9               MR. BAUER: Jack, you can ask during  
10      your questioning.

11              MR. PIROZZOLO: The record should show  
12      what he's pointing to now.

13              THE WITNESS: This looks like the barrel  
14      operation where they cleaned and refurbished  
15      barrels right here so I would say the dump area  
16      would be in here.

17              Q.    Could you circle that and write "Dump"?

18              A.    (Witness complying.)

19              Q.    And do you recall going any further  
20      south --

21              A.    No.

22              Q.    -- on the site than that?

23              A.    No. Nothing down here. We never had  
24      any problems anyway. You know, I had no reason to  
25      go down there.

1 MR. BAUER: Okay.

2 MR. PIROZZOLO: Is this Exhibit 5?

3 MR. BAUER: Yes.

4 MR. PIROZZOLO: What's 4?

5 MR. BAUER: No. 4 is the first incident  
6 report.

7 MR. PIROZZOLO: Okay.

8 (Whereupon, Sparadeo Exhibit No. 6 was  
9 marked.)

10 MR. PIROZZOLO: And the Sanborn map is  
11 3?

12 MR. BAUER: The Sanborn map is 2. The  
13 affidavit is 3.

14 Q. I'm handing you what's been marked  
15 Sparadeo Exhibit No. 6. Is this another one of  
16 those reports that you would fill out regularly  
17 whenever there was a call?

18 A. Uh-hum.

19 Q. And so is this a document that the fire  
20 department kept in the ordinary course of its  
21 business?

22 A. Yes. This one here was -- Murphy was  
23 the chief, he was there. I was there.

24 Q. And you see under report of fire it  
25 says, "Dump Burning"?

1           A.   That's it. I'm surprised he didn't put  
2 more information on it. Evidently -- evidently we  
3 just put that out with a booster tank probably.

4           We had -- it must have been -- it must have  
5 been real small because we didn't do any -- we  
6 didn't do any big lines, we didn't do any  
7 drafting, so evidently we put it out -- it must  
8 have been small. Evidently we put it out with the  
9 water we carried in the truck.

10          Q.   And is this referring to the same dump  
11 area that you talked about before?

12          A.   Yeah. Yeah. This would be the same  
13 thing, yeah.

14                   (Whereupon, Sparadeo Exhibit No. 7 was  
15 marked.)

16          Q.   I'm handing you now what's been marked  
17 Sparadeo Exhibit No. 7. Is this another report  
18 that the fire department would have filled out for  
19 a call?

20          A.   Yes. Uh-hum.

21          Q.   And is this a document that would have  
22 been kept in the ordinary course of the fire  
23 department's business?

24          A.   Yes. Yes.

25          Q.   And your name is on this as someone who

1 reported to the fire, correct?

2 A. Yes. I'm on here. Let's see -- safety  
3 valve on one of the mixing tanks. All steam, no  
4 fire.

5 That's, you know, it was the typical call  
6 that we got, you know, several of those, you know.

7 Q. Do you recall this specific incident?

8 A. No. No.

9 Q. Do you know what's meant by "safety  
10 valve on one of the mixing tanks let go"?

11 A. Well, the only thing I know is that  
12 that's what happened. They had safety valves  
13 on -- evidently some of these things are heated,  
14 there was heat involved, you know, and they had  
15 safety valves and if they overheated, the valve  
16 would kick off and nine out of ten they would call  
17 us in to make sure that, you know, nothing --  
18 nothing else was going on.

19 Q. And would this have been at the chemical  
20 company?

21 A. Yes. This would be in the mill. This  
22 would be in the mill.

23 Q. And what, if any, action would you  
24 take --

25 A. Nothing.

1 Q. -- in response to this call?

2 A. Usually by the time we got there, things  
3 had just calmed down and, you know -- now, this  
4 one here, it must have been -- I guess we didn't  
5 know at the time because we laid hose going in.

6 Q. Where do you see that, that you laid  
7 hose?

8 A. Two-and-a-half-inch hose 450 feet;  
9 inch-and-a-half 200 feet. Engine 1, Ladder --  
10 Ladder 1, Hose 1, and we had another company  
11 coming in. This was in -- let's see, when was  
12 this? Oh, '61.

13 Okay. We had a new ladder then. I see  
14 75-foot aerial. And that's it. There was no fire  
15 involved, just -- but we did -- as a precaution  
16 going in, we didn't know what we had going in. We  
17 just -- that was a normal precaution, you know.

18 If we had a building involved or something,  
19 we would hit a hydrant and lay a line in, you  
20 know, just, you know, to make sure we had water in  
21 case we needed it but in this case here we didn't  
22 need anything.

23 Q. So you didn't spray any water?

24 A. No. No. We didn't do anything. It was  
25 just steam, just steam involved and when it calmed

1 down, that was it. It shuts off, you know, and it  
2 cools down.

3 Of course they -- they do the -- as far as --  
4 we didn't touch anything in the plant. They --  
5 they take care of that. We just went in in case  
6 they needed us.

7 We weren't involved in any of that chemical  
8 operation, you know. We didn't touch any of that  
9 stuff.

10 MR. BAUER: Okay.

11 THE WITNESS: God, I'm looking at this,  
12 you realize most of these guys on this list are  
13 not here anymore.

14 (Whereupon, Sparadeo Exhibit No. 8 was  
15 marked.)

16 Q. I'm handing you what's been marked  
17 Sparadeo Exhibit No. 8. Is this another incident  
18 report?

19 A. Uh-hum.

20 Q. That was a "yes," correct?

21 A. Yes.

22 Q. And as with the others, is this a  
23 document that the fire department would have kept  
24 in its ordinary course of business?

25 A. Yes. Yes.

1 Q. Your name is on this as someone who  
2 reported to the fire, correct?

3 A. Yes. Well, our alarm system -- in other  
4 words, when I got in, I -- it came through the  
5 alarm system. Evidently I answered the alarm, you  
6 know. We had headquarters, the police  
7 headquarters used to send the alarms, you know,  
8 and when we went in the station, we'd pick up the  
9 phone and they'd give us the location, you know.

10 Q. Okay.

11 A. So I evidently took the call.

12 Q. Do you recall this incident that's  
13 described?

14 A. Not -- you know, I -- I can't really  
15 tell you I recall this. We had several of them  
16 like this, you know.

17 Q. And would this have been in the chemical  
18 company?

19 A. This? No. This was the barrel machine  
20 outside.

21 Q. What tells you that this was in the  
22 barrel operation?

23 A. Metal stripping chemicals, run through  
24 a -- what is that? (Witness reading) I can't  
25 even read my own writing.

1 Q. Would that be pulverizing?

2 A. Pulverizing machine, yes. That was, you  
3 know, the barrel machines they had outside. It  
4 was the barrel machines they had outside.

5 It caught -- it caught fire and got away from  
6 them, you know. Now, we evidently -- this was at  
7 night, huh? No, it was during the day.

8 Q. Do you see at the top of the page under  
9 owner it says, "Metro-Atlantic Company"?

10 A. Uh-hum. Well, that's -- I would just  
11 put that down, you know, Metro-Atlantic. It could  
12 have been -- in other words, it could have been --  
13 I guess legally the barrel company was separate.  
14 Were there two separate companies?

15 Q. Well, there was -- there was  
16 Metro-Atlantic --

17 A. Metro-Atlantic.

18 Q. -- was the chemical operation.

19 A. Yes.

20 Q. And then there was New England Container  
21 that was the barrel company, correct?

22 A. Yeah, yeah. But like as far as we're  
23 concerned, we didn't -- we just said, you know,  
24 there was a fire in Metro-Atlantic. You know, we  
25 didn't put New England Container, you know.



1 Q. Understood. So you used Metro-Atlantic  
2 to refer to the entire property?

3 A. Yeah, what we referred to, yeah. That  
4 was just a reference as far as -- you know, we  
5 didn't get involved in whether they were separate  
6 companies or not. It was a chemical company fire  
7 and we went down to treat. That's it.

8 Q. And did you have to use water for this  
9 incident?

10 A. Let's see -- we must have just -- yeah,  
11 booster line. Yeah. We just put it out. This  
12 was a fairly small fire. We were able to contain  
13 it with the water we had on the truck.

14 This -- that tells you the booster, 100-foot  
15 booster. That's the line that we carry on the  
16 truck. We have a tank and we were evidently able  
17 to put it out with that.

18 Q. And when you would put out a fire like  
19 this with water, where would the water go?

20 A. Right in the ground because it was  
21 outside.

22 Q. You didn't collect the water after the  
23 fire?

24 A. No. No. We just put the fire out and  
25 went home.

1                   (Whereupon, Sparadeo Exhibit No. 9 was  
2 marked.)

3           Q.    I'm handing you what's been marked  
4 Sparadeo Exhibit No. 9.  Is this another one of  
5 those fire reports that the company would fill out  
6 anytime there was an incident?

7           A.    This must be the -- this was the large  
8 one at the barrel shop I guess.  Yeah.  Okay.

9           Q.    Is this one of those reports that  
10 would -- that the company would fill out every  
11 time --

12          A.    Yes.

13          Q.    -- there was a fire?

14          A.    Yes.

15          Q.    And was this a document that would have  
16 been kept in the ordinary course of business by  
17 the fire department?

18          A.    Yes.

19          Q.    Do you recall this incident?

20          A.    Yes.  This was quite a large operation,  
21 yep.  We called in quite a few companies.

22                We used 550 feet of two-and-a-half-inch hose,  
23 300 feet of inch-and-a-half hose.  We used  
24 ladders.  This fire started at quarter to 6:00 at  
25 night and we were there until 10:00 o'clock.

1 Q. Was this the large fire that you were  
2 referring to earlier?

3 A. Yes. The biggest fire they had in the  
4 barrel shop, right.

5 Q. And the drying building, that was part  
6 of the barrel shop?

7 A. What is that?

8 Q. Under Report of Fire, the first two  
9 words are Drying Building.

10 A. Oh, yeah. I guess -- I guess that's  
11 what they called it, I guess. I don't know. John  
12 put that name. I have no -- the chief made this  
13 report out. I was there.

14 You know something? Maybe they used that,  
15 when they painted the barrels they put them in  
16 there to dry. Is that -- that's where -- I  
17 can't -- I really can't explain why he called it  
18 the drying building other than the fact that they  
19 painted barrels and maybe they let them dry there.  
20 I don't know. I really don't know.

21 Q. Okay.

22 A. But this was the barrel shop building.  
23 This was -- this was the building that they had --  
24 this is the building when you're coming in. This  
25 is the building you see here.

1 Q. And you are indicating the building that  
2 you circled before?

3 A. Yes.

4 Q. And you used water to put out this fire?

5 A. Oh, yes. Plenty of water. We were  
6 there quite a while.

7 (Whereupon, Sparadeo Exhibit No. 10 was  
8 marked.)

9 Q. I'm handing you what's been marked  
10 Sparadeo Exhibit No. 10. Was this one of those  
11 fire report documents that the company would fill  
12 out every time it had an incident?

13 A. Uh-hum. Yes.

14 Q. And was this a document that the fire  
15 department kept in the ordinary course of its  
16 business?

17 A. Yes.

18 Q. Do you remember this incident?

19 A. I don't remember it specifically but I  
20 can see what I said on it. We had some barrels  
21 burning and we just let them burn out.

22 Q. So you didn't use any water on this?

23 A. No. We didn't do -- we didn't use any  
24 equipment. We just went in alone, Engine 1,  
25 Ladder 1, and evidently there was a few --

1 probably some small barrels, you know, burning and  
2 we just let them burn out. That's all.

3 There was nothing that would spread in other  
4 words. How it got started is beyond me because  
5 this was at 9:00 o'clock at night.

6 I don't think they were working in the barrel  
7 shop -- the barrel shop didn't work at night.  
8 There was people in the chemical plant. I don't  
9 think they worked at night. They had a night  
10 watchman but this was outside. This was outside.

11 Q. It refers to the dump at the rear of  
12 Metro?

13 A. Yeah. That's what I'm referring to  
14 where the -- the barrel operation was. And I  
15 refer to this area as a dump because they stored  
16 all kinds of stuff in there. You'd never know  
17 what you'd find there.

18 Q. And for the record, you're pointing to  
19 the area on the map that you've already labeled  
20 "Dump"?

21 A. Yeah. Yeah. I didn't realize we went  
22 there that many times. My God.

23 (Whereupon, Sparadeo Exhibit No. 11 was  
24 marked.)

25 Q. I'm handing you what's been marked

1 Sparadeo Exhibit No. 11. Is this another fire  
2 report that the company, that the fire department  
3 would fill out every time there was an incident?

4 A. Yes.

5 Q. And is this a document that the company  
6 kept in its ordinary course of business?

7 A. Uh-hum. Yes.

8 Q. And do you remember this incident that's  
9 described?

10 A. No. I was not there. That was the  
11 other captain, DiGuilio. Looks like he only had a  
12 couple of guys.

13 Q. Are you not --

14 A. That Sparadeo is my nephew.

15 Q. Okay.

16 A. That's not me.

17 Q. So your nephew worked with the fire  
18 department as well?

19 A. Yeah. In fact, he had just come in the  
20 department. Metro-Atlantic, dump. That's what  
21 we, you know, we labeled it as and they used the  
22 booster so we used the -- just the -- the water we  
23 had on the truck. That's all we -- he wetted down  
24 and that's it, so it wasn't -- couldn't have been  
25 much of a fire, you know. They just -- they were

1       there 30 minutes. Well, they ran the pump 30  
2       minutes, and yeah, 1:45, 2:30, and that's it, so  
3       that wasn't much of an operation.

4             Q.    Okay.

5             A.    Like I said, we had several of those in,  
6       you know, what I call the dump area. They were a  
7       little bit careless I think.

8                     (Whereupon, Sparadeo Exhibit No. 12 was  
9       marked.)

10            Q.    I'm handing you what's been marked  
11       Exhibit 12. Is this another fire report that the  
12       company would have --

13                     MR. PIROZZOLO:  Objection.

14            Q.    -- the fire department would have filled  
15       out in this --

16            A.    Yes.

17                     MR. PIROZZOLO:  Objection. I believe he  
18       said he left in 1963. This is 1965.

19            Q.    Do you know if you were still working  
20       for the fire department in 1965?

21            A.    No. '65 I was out of there.

22            Q.    Is this a document though that you know  
23       the fire department kept in the ordinary course of  
24       its business?

25                     MR. PIROZZOLO:  Objection.

1           A.    Yes, it is.  And let's see -- yes.  This  
2   was a -- they evidently called for stand-by.  They  
3   were doing -- something happened from what I can  
4   gather now.

5           Like I said, I wasn't here so -- but what I  
6   can read out of this is they -- there was a spill  
7   alarm.  They just went down with the engine and  
8   they had a stand-by because they had some kind of  
9   a spill, acid spill, and they asked the fire  
10  department to stand by while they were doing  
11  something.

12          Q.    Did you --

13               MR. PIROZZOLO:  Excuse me.  I move to  
14  strike the answer.

15          Q.    Did you discuss this incident with any  
16  of your former colleagues in the fire department?

17          A.    No.  No.  I didn't -- no, I had no way  
18  of knowing this happened.

19          Q.    You don't have any recollection --

20          A.    No.

21          Q.    -- of an acid spill?

22          A.    No.  No.  No.

23          Q.    Do you remember somebody at the fire  
24  department named Murphy?

25          A.    Yes.



1 Q. Who was that?

2 A. There was a chief, John Murphy, and he  
3 had a son John Murphy, Jr., who was there later  
4 on.

5 Q. Do you know if he is still alive?

6 A. Yes, yes. Junior is. John Murphy, the  
7 chief, has passed away.

8 Q. Okay.

9 A. In fact, they got a dedication of his  
10 service to the town next week I think it is  
11 they're going to dedicate. He was fire alarm  
12 superintendent besides and they're going to  
13 dedicate -- they're going to put a plaque up for  
14 him.

15 He started -- he put the alarm system in the  
16 town himself. He installed the wires and they're  
17 going to dedicate a memorial to him. He's been  
18 dead 35 years.

19 I just discovered this. I talked to his son.  
20 Been dead 35 years, so I didn't realize it was  
21 that long ago.

22 MR. BAUER: If you can bear with me for  
23 just a moment, I'm going to consult with my  
24 colleague.

25 THE WITNESS: Okay.

1 ( P A U S E )

2 BY MR. BAUER:

3 Q. Do you have in your possession any fire  
4 department records?

5 A. No. No.

6 MR. BAUER: Okay. I don't have any  
7 further questions at this time. The other  
8 attorneys here may have some questions for you and  
9 it's possible I'll have some follow-up ones after  
10 that but for the time being, I'm finished. Thank  
11 you very much.

12 THE WITNESS: Okay.

13 MR. RAY: Let's take a short break.

14 MR. BAUER: Sure. Five-minute break.

15 ( R E C E S S )

16 EXAMINATION

17 BY MR. RAY:

18 Q. Good morning, again, Mr. Sparadeo. My  
19 name is Jim Ray and I represent New England  
20 Container. I just have hopefully a few questions  
21 to follow up on Attorney Bauer's questions.

22 I want to first ask you about a couple of the  
23 individuals you mentioned. The first, I believe,  
24 was Felix Palumbo?

25 A. Uh-hum.

1 Q. Did you say that Mr. Palumbo has passed  
2 away?

3 A. Yes.

4 Q. How did you know Mr. Palumbo?

5 A. Well, I grew up with him. We were  
6 neighbors.

7 Q. Okay.

8 A. Went all through school together.

9 Q. And what was your understanding of what  
10 Mr. Palumbo did at the site?

11 A. Drove -- drove a truck. That's all I  
12 know that he did. Other than that, you know.

13 Q. Do you know for whom he drove the truck?

14 A. I assumed it was Metro-Atlantic but I'm  
15 not, you know -- I have --

16 Q. That's fine. I'm just trying to  
17 understand it.

18 A. Yeah.

19 Q. Do you have any reason to believe he  
20 drove the truck for the barrel company?

21 A. No. I don't -- I don't know whether he  
22 did or not. I don't know.

23 Q. The second -- oh, yes, the second name  
24 you mentioned was Angelo Carbone, correct?

25 A. Uh-hum.

1 Q. And how did you know Mr. Carbone?

2 A. Same thing. We grew up together in the  
3 same neighborhood, went to school together and he  
4 was -- he drove a truck. That's all I knew.

5 Q. And for whom do you believe he drove the  
6 truck?

7 A. Yeah. Well, I thought they drove for  
8 Metro, you know, but I'm not, like I said...

9 Q. Okay.

10 A. We never separated the operation, you  
11 know. We just called it Metro-Atlantic, you know,  
12 and that was it, you know.

13 Q. Did you ever have conversations with  
14 Mr. Palumbo about what he did other than driving  
15 the truck?

16 A. No. No.

17 Q. Did he ever tell you what he was  
18 driving, what -- what the truck contained?

19 A. No. No. No. No.

20 Q. And is Mr. Carbone, Angelo Carbone, has  
21 he passed away?

22 A. Yes.

23 Q. You mentioned a Walter Murphy. How did  
24 you know Mr. Murphy?

25 A. He was in the fire company with me.

1 Q. And did he also work at the site?

2 A. He worked -- you know, I can't really  
3 tell you what his job was. He worked -- he worked  
4 there. That's all I knew, you know.

5 Q. So you don't know whether he worked in  
6 the barrel operation or the chemical company?

7 A. No, I don't.

8 Q. And how about his brother?

9 A. His brother was a night watchman.  
10 That's all I knew, you know. They said he was,  
11 you know...

12 Q. You mentioned a Mr. Taylor, correct?

13 A. Yeah. Like I said, I didn't know him  
14 very well but I know he worked there and I think  
15 he drove a truck but other than that, that's  
16 about, you know, the extent of my knowledge of  
17 him.

18 Q. Okay. I want to ask you a little bit  
19 about the operations at the site.

20 You've referred to the mill building where  
21 the chemical company operated, correct?

22 A. Uh-hum.

23 Q. Did you ever observe the operations in  
24 that building taking place?

25 A. No. No.

1 Q. And how about what you've referred to as  
2 the barrel operation, did you ever see the barrel  
3 operations taking place?

4 A. Oh, yeah.

5 Q. And when did the -- describe for me what  
6 you saw.

7 A. Well, on several occasions I -- I went  
8 in there to get a barrel, you know, and because  
9 Walter Murphy would -- you know, he told me, he  
10 said, you know, "Anytime you want a barrel, come  
11 down and see me," you know, and -- and when I  
12 needed a barrel for something, I went down to see  
13 Walter and he got me a barrel.

14 Q. Okay. And how often do you think you  
15 recall that happening?

16 A. Oh, God. Three, four times. That's  
17 all, you know.

18 Q. For what did you use these barrels?

19 A. Mostly rubbish burning, you know. In  
20 those days you could do that. You can't do that  
21 anymore today.

22 Q. And what did you see as far as the  
23 barrel operation was concerned?

24 A. What did I observe what they were doing?

25 Q. Right. Based upon what you observed.

1           A.    As far as I'm concerned, what I  
2    observed -- well, I observed the -- the operation  
3    itself when they were -- you know, they'd take  
4    barrels and put them in this machine.  I don't,  
5    you know -- I'm not going to tell you I know  
6    how -- everything they did but they had a machine  
7    that they straightened out the barrels and they  
8    had sandblasters, they'd clean them and whatever  
9    they did.

10           Like I said, whatever refuse -- stuff was in  
11    them, they just dumped on the side of the river  
12    and they cleaned -- you know, the barrels were  
13    refurbished and painted and I assumed they stacked  
14    them in the building, you know, after they were,  
15    you know, because I -- I assumed they sold these  
16    new barrels, they sold them.

17           Q.    One of the things you mentioned was  
18    sandblasting.  Did you actually see sandblasting  
19    or is that something you were told they did?

20           A.    I can't -- no, I wouldn't -- well, I saw  
21    the machines there.  I don't know, you know, what  
22    exactly -- each operation.  The machines were  
23    outside.  The machines were outside.  They weren't  
24    in the building, they were outside, and they, you  
25    know, I generally saw, you know, the operation but

1 I didn't pay attention to it.

2 Q. How many machines do you recall seeing?

3 A. I -- I can't even remember that.

4 Q. And what do you remember about what you  
5 saw in terms of the operation of the machine?

6 A. What I do remember is that they took  
7 whole barrels and they cleaned them up and  
8 whatever chemicals were in them, whatever there  
9 was, you know, was cleaned up and that's it.

10 Q. You mentioned stuff dumped in the river  
11 on the ground. Did you actually see that happen?

12 A. Well, yeah, I've seen -- I've seen  
13 barrels dumped on the side of the river, not --  
14 they didn't -- they didn't go down into the river,  
15 they just dumped them on the side of the bank.

16 Q. All right. I'm trying to make sure I  
17 understand what you saw.

18 You saw barrels on the side of the bank,  
19 correct?

20 A. Yes.

21 Q. And is that where you marked on  
22 Exhibit 2 where it says "Dump"?

23 A. Yeah. That would be -- yeah, it would  
24 be down in this area here, yeah.

25 Q. Okay. And am I correct that that's



1 something that when you were at the site, you saw  
2 barrels in that location?

3 A. Oh, yeah. Yeah.

4 Q. Did you ever see anyone empty the  
5 contents of the barrel onto the ground?

6 A. No, I can't say that I did.

7 Q. Okay.

8 A. I knew that -- just generally knew what  
9 they were doing, you know, and like I said, I  
10 couldn't tell you I saw an individual take a  
11 barrel and dump it, no.

12 Q. I'm sorry. You say you generally knew  
13 what they were doing?

14 A. Yeah.

15 Q. What is the basis for that knowledge?

16 A. Well, how many times we got called down  
17 there. We got called and this -- this dump area,  
18 you know, they were very -- junk all over the  
19 place, and they had small fires there. They had  
20 small fires there.

21 Q. What type of junk? Could you describe  
22 the type of junk that was in that pile?

23 A. Well, you know, just messy area. You  
24 know, there was all kinds of stuff.

25 Q. What -- you've mentioned barrels. What,

1 in addition to barrels, would you observe at that  
2 location?

3 A. Well, there was just generally rubbish,  
4 you know. It wasn't -- it was an unkempt area.  
5 That's what I would call it.

6 You know, they weren't neat about their  
7 operation. It was kind of -- as far as I'm  
8 concerned, it was a sloppy operation out there in  
9 the yard, you know. They weren't very neat.

10 Q. When you observed this building that you  
11 circled in blue on Exhibit 2 near the word  
12 "Metro," what did you observe inside that  
13 building?

14 A. Never went inside until we had the fire.

15 Q. Okay. And do you recall going inside  
16 during the fire?

17 A. Oh, yeah. Yeah.

18 Q. And what did you see there if you could  
19 see at all?

20 A. No, no, I wouldn't say I saw anything.  
21 The whole building was engulfed. It shot through  
22 the roof. We just -- we just went in and poured  
23 water in there and contained it, put it out and  
24 that was it. That's the end of our run. When we  
25 got it out, we left.

1 Q. Do you recall seeing barrels inside that  
2 building?

3 A. Oh, yeah. There was, you know, there  
4 was barrels in there.

5 Q. Do you happen to recall whether those --

6 A. No.

7 Q. -- were in process or completed barrels?

8 A. No, I couldn't tell you anything about  
9 them because that's the only time we -- I had any  
10 occasion to go in that building was when there was  
11 a fire and, like I said, it was at night. The  
12 visibility wasn't too great and we contained the  
13 fire, put it out and left.

14 That's the end of our operation. What  
15 happened after that is -- I don't know.

16 Q. You mentioned Mr. Palumbo, Mr. Carbone,  
17 two Murphy brothers and Mr. Taylor. Do you recall  
18 anyone else who worked there?

19 A. Not that I know of.

20 Q. Now, when Mr. Bauer went through these  
21 fire reports, am I correct that you would not have  
22 visited the site on official fire department  
23 business after 1963, is that correct?

24 A. No. Yes, yes. That's correct.

25 Q. That's correct. Okay. And some of

1 these are written by you and some are not,  
2 correct?

3 A. Uh-hum.

4 Q. What determined whether or not you would  
5 write a report versus someone else?

6 A. If I was in charge of it. If -- the  
7 only one over me was the chief.

8 If the chief was there, he wrote the report.  
9 If I was there, I, you know -- if I was in charge  
10 of the fire, I wrote the report. If there was a  
11 fire -- whoever was in charge of the fire wrote  
12 the report.

13 Q. Let me ask you if you have those in  
14 front of you. We'll start with Exhibit 4, and if  
15 you would just look at the list of names at the  
16 bottom.

17 A. Uh-hum.

18 Q. And can you tell me if any of those  
19 individuals are still alive today?

20 A. Yes.

21 Q. And if you would identify those who you  
22 know to still be alive?

23 A. Going on the engine company, John  
24 Murphy, Jr., is still alive. Pat Ruggiano, he's  
25 still alive. He lives in Tennessee.

1 Q. Where does John Murphy, Jr. live?

2 A. He lives in North Providence. And then  
3 on the other side, let's see, Charpentier, he's  
4 dead. Jutrus, I believe he lives in Florida.

5 Q. And is it your recollection -- what's  
6 his first name?

7 A. Eugene.

8 Q. And is that J-U-T-R-U-S?

9 A. Yes.

10 Q. And what is Mr. Ruggiano's first name?

11 A. Pat.

12 Q. And is it R-U-G-G-I-A-N-O?

13 A. Yes. And he's gone, he's gone, he's  
14 gone. That's -- that's it.

15 Q. Okay.

16 A. These other guys are gone.

17 Q. And now if you would flip over to  
18 Exhibit 6, let me see if I have it here, would you  
19 do the same thing for the list of names on that  
20 exhibit? Obviously you've already mentioned  
21 Mr. Murphy, Jr.

22 A. Yes. Let's see -- Borello has passed  
23 away. Draper, Charpentier, they passed away.  
24 Granshaw, he passed away. Chabot passed away.  
25 Roy -- I think that's Roy, and I think he's still

1 living.

2 Q. What's his first name?

3 A. I'm just trying to think of that now. I  
4 can't recall it.

5 Q. Mr. Sparadeo, I apologize to the extent  
6 that many of these individuals may have been  
7 friends of yours to bring back memories of them  
8 passing away. I'm just trying to determine  
9 whether --

10 A. Yeah, I know it. Most of them -- yeah.  
11 Now, I don't know about this Phelps. I have no  
12 recollection of him anymore. I don't know what  
13 happened to him. And Bradley, those two there, I  
14 don't know. I haven't had contact with them for  
15 years.

16 Q. Okay. And if we could look -- and again  
17 all we're looking for is the best of your  
18 recollection -- Exhibit 7, and again to try to  
19 make it go quickly if there's just any of them on  
20 there who you know are still alive today and if  
21 you know where they are.

22 A. Okay. Let's see -- the ones I know of,  
23 Harold Darby. That says H. Darby. He's in a  
24 nursing home in Smithfield.

25 Q. Is that Harold Darby?

1           A.   Harold Darby.  The next one is Donald  
2 Darby.  He lives in Florida.  In fact, I had  
3 contact with him this winter.

4           Q.   Do you know where in Florida?

5           A.   Palm Coast.

6           Q.   Palm Coast?

7           A.   Palm Coast.  Now, let's see, all the  
8 ones on the right-hand side on the ladder  
9 company --

10          Q.   Yes.

11          A.   -- they're all -- they're all passed  
12 away.

13          Q.   Okay.

14          A.   And let's see -- Chief Murphy, Captain  
15 Sparadeo, Lieutenant Mollo, he's passed away.  
16 Murphy passed away.  I'm the only one left of the  
17 officers.

18          Q.   I think this will go quicker as we go  
19 through here.  I'm now showing you Exhibit 8.  Is  
20 there anyone else on that list that you know to be  
21 still alive?

22          A.   Pat Ruggiano and Poirier.

23          Q.   And what's Poirier's first name?

24          A.   Richard.

25          Q.   And is that -- do you know is it

1 P-O-R-R-I-O-R?

2 A. I think it is, yes.

3 Q. And do you know where Mr. Poirier is?

4 A. The last time I know he was living in  
5 Smithfield. He ran -- he ran for office last  
6 year. He ran for state senator.

7 Q. Was he successful?

8 A. You know something? I don't even know  
9 because I left -- I voted absentee ballot and I  
10 went to Florida and I don't know if he got elected  
11 or not.

12 Q. Okay.

13 A. When I came back home -- I haven't been  
14 home that long from Florida -- and I asked my  
15 brother-in-law and he didn't remember. Anyway,  
16 Lieutenant D. Battista, he's still living.

17 Q. What is his first name?

18 A. Daniel.

19 Q. Do you know where Daniel Battista lives?

20 A. He lives in Centredale on Smith Street.  
21 And all the other ones are passed away.

22 Q. Okay. Apparently I lied because the  
23 next list is a little longer but I'd ask you to  
24 look at Exhibit 9 and see if there are any names  
25 there that you recognize of individuals who are



1 still alive.

2 A. George Bolpitt.

3 Q. How do you spell that?

4 A. George Bolpitt, B-O-L-P-I-T-T, and he  
5 lives in the high-rise building --

6 Q. Which one?

7 A. -- that we're -- that we're talking  
8 about.

9 Q. Which one, do you know?

10 A. No, I don't know. I know he lives in  
11 there.

12 Q. I mean you don't know whether it's Brook  
13 Village or Centredale Manor?

14 A. No, I don't know. I didn't know they  
15 were separate.

16 Q. Okay. And --

17 A. And like I said, he's there and there's  
18 Poirier again. Darby, that's the same Darby  
19 that's in Florida. All the other officers are --  
20 are all passed away. There's Pat Ruggiano again.  
21 He lives in Tennessee.

22 Q. Do you know where in Tennessee?

23 A. In Nashville. That's all I can tell  
24 you. Charles Salisbury, he -- he retired out of  
25 the fire department. He's -- last time I knew he

1 was living in North Fort Myers.

2 And there's my nephew, Walter Sparadeo. He's  
3 still living. He lives in Centredale. And that's  
4 it. The other ones I don't know what happened to  
5 them.

6 Q. Okay. We'll quickly go through  
7 Exhibit 10, see if there's any new names on there.  
8 You don't have to repeat the ones you've already  
9 identified --

10 A. Yeah.

11 Q. -- that you know to be still alive.

12 A. Okay. M. Chagnon, Mitchell Chagnon.

13 Q. Is that C-H-A-G-N-O-N?

14 A. Yeah. He lives in Narragansett, down in  
15 Narragansett. Okay. We went over that name, that  
16 name. Salisbury, that's -- we went over that one.  
17 Okay. That's it.

18 Q. All right. Almost done. We'll go with  
19 this one. There is a Poirier on Exhibit 11 and  
20 it's spelled a little differently. P-O-I --

21 A. That's the same guy. That's the same  
22 guy.

23 Q. So it could be spelled P-O-I-R-I-E-R?

24 A. Richard Poirier.

25 Q. Let me just spell it for her.

1 P-O-I-R-I-E-R. All right. And finally  
2 Exhibit 12, is there any --

3 A. No, there's nobody.

4 Q. Okay.

5 A. Those are all gone.

6 Q. What is the best of your recollection as  
7 to the number of buildings in which the barrel  
8 operation took place?

9 A. The main building was the -- the one  
10 that was engulfed in fire and that's all I know,  
11 and then we went back and the barrel operation  
12 machines were outside. They weren't in the  
13 building.

14 Q. And do you have a recollection of  
15 whether the barrels that were handled in the  
16 machines went -- ever went into the building?

17 A. Well, I assumed that they did but I'm,  
18 you know, I -- I couldn't guarantee it because  
19 when barrels were refurbished, you know, you  
20 didn't see them outside, so I assumed that, you  
21 know, they stored them in there.

22 Q. So you don't recall seeing  
23 refurbished --

24 A. I had no occasion to go in that building  
25 except the night it was on fire.

1 Q. And am I correct that -- well, how about  
2 the mill building, did you ever have occasion to  
3 go in the mill building?

4 A. We went in a few times, yes.

5 Q. For what purpose?

6 A. Small -- small fires. We had that one  
7 with the steam. I wasn't there at that one but I  
8 mean we didn't have any major fires in the -- in  
9 the Metro building.

10 They -- I guess they were, you know -- well,  
11 handling chemicals, I guess, they were pretty  
12 careful, you know, but we didn't have any major  
13 fires in there.

14 Q. You mentioned a building up on the --  
15 closer to Smith Street that you said was furniture  
16 storage. Did you ever go in that building?

17 A. No. No.

18 Q. And I think Attorney Bauer asked you  
19 earlier about buildings further south on the site  
20 from -- did you go in the buildings --

21 A. No.

22 Q. -- on the further south portion?

23 A. No. I never had any occasion -- I never  
24 had any problems there. I never had any occasion  
25 to go in them.

1 Q. And do you recall a separate building on  
2 the same side as the buildings you have circled on  
3 Exhibit 2 further south along the river?

4 A. No. No. I don't recall that at all.  
5 No.

6 Q. I'm going to ask you to look at  
7 Exhibit 3 for a minute and in the second numbered  
8 paragraph it states you saw liquids on the ground  
9 area of the facility which was a mixture of water  
10 and chemicals. Do you see that?

11 A. No. Where are you at? Where are you  
12 looking?

13 Q. In the second numbered paragraph.

14 A. Oh, okay.

15 Q. Down here it says, "I saw liquid on the  
16 ground."

17 A. Yeah.

18 Q. Can you tell me what it was that made  
19 you conclude it was chemicals as opposed to water  
20 for example?

21 A. No. I just assumed because that's what  
22 they did. They had chemical -- they had barrels  
23 of chemicals so, you know, there was a mixture,  
24 you know, so...

25 Q. When you say they had --

1           A.    I don't know anything about chemicals so  
2 I can't tell you they had this chemical or that  
3 chemical. I can't tell you that. All I know is  
4 they were cleaning barrels that had chemicals in  
5 them.

6           Q.    What is it that you observed that makes  
7 you say they had -- they were cleaning barrels  
8 that had chemicals in them?

9           A.    That's what they told me they were  
10 doing.

11          Q.    And do you recall who told you that?

12          A.    Yeah. Walter Murphy.

13          Q.    So it's your recollection that Walter  
14 Murphy worked for the barrel company?

15          A.    I didn't really know who he worked for.

16          Q.    Okay.

17          A.    He worked there. He was there, you  
18 know. Now, whether he worked for Metro or he  
19 worked for the barrel shop, I don't know.

20          Q.    Did Mr. Murphy tell you they had  
21 chemicals in them or that they at one time had  
22 chemicals in them?

23          A.    Both.

24          Q.    And did you personally observe any  
25 chemicals in the drums?

1           A.    I would say -- I don't know if I could  
2 say personally. I saw the -- the operation and  
3 they were liquids, you know. I'm not -- I'm not  
4 going to be able to tell you what they were. They  
5 were liquids there and, you know, if they had  
6 liquids in the barrel, they dumped them on the  
7 side of the river. That's all they did.

8           Q.    Why is it that -- what is it that --  
9 what personal knowledge do you have that they  
10 dumped liquids on the side of the river?

11           Again, I'm trying to distinguish what you saw  
12 and what you know versus what somebody told you.

13           A.    Well, it's more -- more or less what I  
14 knew the operation was. No, I didn't, you know, I  
15 didn't stand there -- you know, I can't tell you  
16 every operation that they did, you know, but my  
17 knowledge that I got from like what Walter Murphy  
18 told me because he was my contact to get a barrel  
19 and he told me what they did.

20           Q.    Did Walter Murphy ever tell you that he  
21 dumped the contents of a barrel on the bank of the  
22 river?

23           A.    I didn't know what he did.

24           Q.    Now, when you were asked questions about  
25 Exhibit 6, which you've got, it says -- Exhibit 6

1 says: "Street - Rear Metro-Atlantic," and it  
2 says, "Dump Burning." Do you see that?

3 A. Uh-hum.

4 Q. Exhibit 6.

5 A. Uh-hum.

6 Q. Several times -- and this may be -- let  
7 me withdraw that and start all over again.

8 Several times I recall you using the word  
9 "evidently." Do you recall this particular  
10 incident?

11 A. No, I wouldn't. I wouldn't recall this  
12 particular incident, no. Evidently --

13 Q. That's -- if you don't recall, that's  
14 fine.

15 A. Yeah. All I can tell you is it was  
16 small because I can tell by what we did, you know.  
17 It wasn't a big, big issue, you know.

18 Q. And you base that upon what you are  
19 reading in this report?

20 A. What equipment we used, you know, and,  
21 you know, it wasn't a big deal so it was a very  
22 small -- whatever fire was involved was very  
23 small.

24 Q. And this Exhibit 6 would have been  
25 prepared by Chief Murphy, correct?



1           A.    Yes.  Yes.  He was in charge of it and  
2 he signed it.

3           Q.    Now, if you look at Exhibit 7, which is  
4 the next one, it says -- this refers to safety  
5 valve on one of the mixing tanks.

6           A.    Uh-hum.

7           Q.    Is this also prepared by somebody other  
8 than you?

9           A.    Yes.  The chief wrote this.

10          Q.    Do you recall this incident where there  
11 was some windows broken from the blast?

12          A.    No.  No, I don't.  I don't remember that  
13 much about this.  Evidently we, as a precaution,  
14 we laid a line in and we didn't do any work, you  
15 know, as far as -- there was nothing we did.

16          Q.    I'm going to ask you to look at  
17 Exhibit 8 which I believe, if you would confirm  
18 for me, is one that was prepared by you?

19          A.    Uh-hum.

20          Q.    Now, again, you've identified -- this  
21 identifies the owner as Metro-Atlantic and you  
22 testified that you didn't always make a  
23 distinction, correct, between the chemical company  
24 and the barrel company?

25          A.    Yes.

1 Q. Now, this says -- do you recall this  
2 specific incident?

3 A. No.

4 Q. Okay. You testified earlier -- well,  
5 under Report of Fire on Exhibit 8 it says, "Metal  
6 stripping chemicals run through a pulverizing  
7 machine..."

8 A. Yeah.

9 Q. "...machine overheated and chemicals  
10 caught fire. Slight damage to machines." Did I  
11 read that correctly?

12 A. Yes.

13 Q. I thought you testified earlier that you  
14 associated this with the barrel company. Did I  
15 hear that correctly?

16 A. Yeah.

17 Q. Why do you associate that with the  
18 barrel company?

19 A. This was -- this was outside.

20 Q. What is it about -- what is it about  
21 what you read in here that tells you that it was  
22 outside?

23 A. The machines. The barrel machines were  
24 outside.

25 Q. But where do you read in here that this

1 relates to the barrel machines?

2 A. I don't know what -- I can't -- I can't  
3 recall why I call that name, you know. The  
4 machine did -- it sandblasted the barrels and, you  
5 know, they cleaned them and so the machine caught  
6 fire, not the chemical -- not the barrel.

7 Q. Is it possible that it's referring to a  
8 machine associated with the chemical company?

9 MR. PIROZZOLO: Objection.

10 A. Is it possible? Well, no. No. That  
11 machine there was outside. That was the barrel  
12 operation.

13 Q. And I guess my question was -- and I  
14 could have misheard you and I apologize -- I  
15 thought I heard you say you didn't have a specific  
16 recollection of this incident. Did I hear that  
17 wrong?

18 A. Yeah. I -- I couldn't -- if you had to  
19 ask me certain questions about it, the only thing  
20 I can go is on the report.

21 Q. And I guess my question is by going on  
22 the report, what is it that you read in this  
23 report that makes you assume that when you are  
24 referring to a pulverizing machine in the report,  
25 that that relates to the barrel operation?

1           A.    Well, let's see, we used a smoke  
2 ejector, hand lights, asbestos gloves, so now I'm  
3 looking at this and I'm saying it could have been  
4 in the building, the barrel building, because we  
5 went -- we went in with a mask.

6           You know, we used two Scott Air-Paks and we  
7 used a smoke ejector and we used hand lights and  
8 it was during the daytime so I just looked at it  
9 right there. It's in the building. It's in the  
10 barrel -- it's in the barrel shop.

11          Q.    Why do you say it's in the barrel shop?

12          A.    Well, it's right here, "Make of Fire:  
13 Building."

14          Q.    But why is it the barrel building as  
15 opposed to a different building?

16          A.    Well, this is -- it wasn't in the  
17 chemical.

18          Q.    And why is it that you state that?

19          A.    Well, because I can tell by the report.

20          Q.    And that's what I'm trying to get at.  
21 What is it about the report that you can tell it's  
22 in the barrel building and not in another  
23 building?

24          A.    Because of the -- what the setup is  
25 here, that had to be in the barrel -- it had to be

1 in the barrel shop.

2 Q. What setup are you referring to?

3 A. Because I would have put the -- the --  
4 see, I got Metro-Atlantic over here but we, you  
5 know, that's just the routine. We don't -- we  
6 didn't distinguish between Metro and the barrel  
7 shop.

8 Q. Okay.

9 A. We didn't distinguish but this fire was  
10 in the building where the barrels were.

11 Q. And is that based on your recollection  
12 or --

13 A. That's based on what I'm reading here,  
14 not recollection.

15 Q. Okay. That's what I'm trying to figure  
16 out.

17 What is it that you are reading that tells  
18 you it was in the barrel building versus another  
19 building, as opposed to another building?

20 A. "Make of Fire: Building. Cause:  
21 Overheated Machine." This is what makes it --  
22 puts it in that building there. I would have  
23 worded it different if it was in the chemical.

24 Q. What would you have written?

25 A. Well, we would -- you know, we would put

1 the mill, you know. This -- this was the barrel  
2 operation. Metal stripping chemicals, pulverizing  
3 machine, machine overheated, chemicals caught  
4 fire. Slight damage to machine. That was --  
5 those types of machines weren't in the chemical  
6 building.

7 Q. How do you know that?

8 A. Just from my observation.

9 Q. So --

10 A. They didn't have any barrel operation in  
11 the mill. The mill didn't have any barrel  
12 operation.

13 Q. But would they have had barrels?

14 A. Of course. They got barrels of  
15 chemicals.

16 Q. And would those have included metal  
17 stripping chemicals?

18 A. No. They didn't do any operation, they  
19 didn't do any barrel operation in the chemical  
20 company. The barrel operation was all in this  
21 area here. This was the barrel operation right  
22 here.

23 Q. My question was a little bit different.  
24 Could they have handled metal stripping chemicals  
25 as part of the chemicals that they either made or

1 sold from the chemical company?

2 MR. PIROZZOLO: Objection.

3 A. I couldn't answer that. I couldn't  
4 answer that. The only thing I can tell you is  
5 from what I know, what I saw, what I observed is  
6 all the barrel operations were here, confined to  
7 this area here. Whatever they did in the mill  
8 with chemicals and barrels, naturally they had  
9 barrels and they had chemicals.

10 Q. Do you know whether they had a  
11 pulverizing machine in the mill?

12 A. All the barrel operation that I know  
13 of --

14 Q. I'm sorry, Mr. Sparadeo. It's a very  
15 specific question. Do you know whether they had a  
16 pulverizing machine in the mill?

17 A. No.

18 Q. No, you don't know?

19 A. No, I don't know.

20 Q. Okay.

21 A. I don't know.

22 Q. And now I'm going to ask similar  
23 questions about Exhibit 9.

24 On Exhibit 9 in the report of the fire it  
25 identifies the drying building. Do you see?

1 A. Uh-hum.

2 Q. And do I understand your testimony to be  
3 that that refers to the building you have  
4 identified as --

5 A. Yes.

6 Q. -- as Exhibit 2 as the barrel operation?

7 A. The first building, the big building.

8 Q. And why is it that you believe that's  
9 referred to as the drying building?

10 A. I -- I couldn't tell you because John  
11 wrote this report and I don't know why he put  
12 drying building.

13 I have no -- I never noticed it. Well,  
14 evidently it seems logical because they -- they  
15 cleaned the barrels outside and stripped them and  
16 sandblasted them and painted them and they  
17 probably stored them inside when they painted  
18 them.

19 Now, I don't even know where they painted  
20 them. I couldn't tell you where they painted them  
21 but they did paint them.

22 Q. Why do you say that?

23 A. Well, they refurbished old barrels and  
24 they looked like brand-new barrels. They  
25 repainted them. I saw them.



1 Q. You saw new barrels?

2 A. I saw the barrels after they were  
3 refurbished and they looked like new barrels, you  
4 know.

5 Now, looking back now, I would assume that  
6 John called it a drying building. They probably  
7 did -- when they repainted their barrels, they  
8 probably stored them in there to dry.

9 Q. Do you know whether the chemical company  
10 had any drying operations?

11 A. No. No. I don't know.

12 Q. You don't know, correct? I just want to  
13 make sure the record is clear. You don't know,  
14 correct?

15 A. No, I don't know. Yes.

16 MR. RAY: Mr. Sparadeo, thank you very  
17 much. I don't think I have any other questions.

18 THE WITNESS: You're welcome.

19 MR. RAY: Mr. Pirozzolo may have a few  
20 questions.

21 MR. PIROZZOLO: I have some questions  
22 and my question is do you want to continue on or  
23 have lunch?

24 THE WITNESS: Oh, no. I -- I don't  
25 think we're going to be that much longer, are we?

1 MR. PIROZZOLO: I don't know.

2 THE WITNESS: Okay. Keep going.

3 MR. PIROZZOLO: I'm just going to move  
4 because the stenographer likes me to be on the  
5 other side of the table.

6 EXAMINATION

7 BY MR. PIROZZOLO:

8 Q. Mr. Sparadeo, as I told you before, I'm  
9 counsel for Emhart and I have a few questions for  
10 you.

11 A. Okay.

12 Q. Do you have any idea who Emhart is?

13 A. No.

14 Q. Just so you know what this is about is  
15 the United States claims that Emhart is the  
16 successor to Metro-Atlantic and, therefore, is  
17 responsible for whatever Metro-Atlantic did on the  
18 site.

19 A. Uh-hum.

20 Q. And that's something that we may have an  
21 argument about but at the present time the reason  
22 I'm asking you questions is because my questions  
23 relate to Metro-Atlantic's prior operation.

24 If you could just back up a little, how old  
25 are you?

1 A. Eighty-five.

2 Q. And could you tell us what education  
3 you've had, formal education?

4 A. Formal? Two and a half years of high  
5 school. That's it.

6 Q. And when did you leave high school  
7 approximately?

8 A. 1943.

9 Q. And did you have part-time work before  
10 you left high school?

11 A. Oh, yeah.

12 Q. What type of part-time work did you do?

13 A. I worked -- in high school? You're  
14 talking part time in high school?

15 Q. Before you left high school.

16 A. I worked for First National Food Stores.

17 Q. Okay. And then after you left high  
18 school, did you take full-time work?

19 A. No, not much. I went in the Navy.

20 Q. You went right into the Navy.

21 A. '44 I went in the Navy.

22 Q. And you were in the Navy I think you  
23 said until you were --

24 A. '46 I was discharged.

25 Q. And then after 1946, when you came out

1 of the Navy, what work did you do?

2 A. I went into A & P.

3 Q. And for how long did you work for A & P?

4 A. Thirty years.

5 Q. And subsequently did you say you worked  
6 for Brown & Sharpe?

7 A. After that, yes. A & P -- I was laid  
8 off. A & P closed the stores in Rhode Island and  
9 then I went into machine shop work.

10 Q. Okay. Had you had any prior experience  
11 in machine shop work?

12 A. Yeah, I did a little part-time work when  
13 I was meat cutting. I used to work four nights a  
14 week. I cut meat 40 hours a week during the day  
15 and I spent 20 hours in the machine shop at night.

16 Q. Cutting metal?

17 A. I had -- I had a few kids to support  
18 and, you know --

19 Q. Okay.

20 A. -- I had to work 60 hours a week.

21 Q. What type of -- what type of machines  
22 were those?

23 A. Screw machine work.

24 Q. Screw machine?

25 A. Yes. With Brown & Sharpe, Brown &

1 Sharpe made cutting tools, metal cutting tools.

2 Q. Brown & Sharpe made tools for lathes,  
3 didn't it, cutting tools for lathes?

4 A. Yes. Uh-hum.

5 Q. And milling machines?

6 A. And I was in the sharpening department.  
7 I finished them, I finished the cutters.

8 Q. And they made those tools in the shop  
9 that you worked in?

10 A. Yes.

11 Q. And you said that was up the river from  
12 Centredale?

13 A. Yes.

14 Q. About how far?

15 A. Oh, less than a half a mile probably,  
16 you know.

17 Q. Was Brown & Sharpe right on the  
18 riverbank?

19 A. Yeah. Yeah. It was the next mill up.

20 Q. The what?

21 A. It was the next mill up, up the river.

22 Q. And when you worked for Brown & Sharpe,  
23 did you handle any chemicals?

24 A. Did I have what?

25 Q. Handle any chemicals.

1           A.    No.  Well, yes.  They had -- if you want  
2  to call them chemicals, they had stuff for  
3  cooling, you know, machines.  I don't know what  
4  they -- I don't know what -- it was a cooling  
5  stuff.

6           Q.    Did you --

7           A.    I have no idea, you know.

8           Q.    Did you use any degreasing chemicals?

9           A.    I didn't.

10          Q.    Did Brown & Sharpe use degreasing --

11          A.    I would assume they did.

12          Q.    Did you know or do you know what perc  
13 is?

14          A.    No.  No.

15          Q.    Do you what perchloroethylene is?

16          A.    No.

17          Q.    Do you know what tetrachloroethylene is?

18          A.    Yeah.  Carbon -- I think they used.

19          Q.    Do you know what carbon  
20 tetrachloroethylene is?

21          A.    Yeah.  Carbon tetrachloride.  I think  
22 they used that to clean some parts sometimes.

23          Q.    Did they have a vat kind of thing for  
24 dipping chemicals in to degrease them?  I'm sorry.  
25 Did they have a vat to dip parts in to degrease

1 them?

2 A. I couldn't tell you. My operation where  
3 I worked we didn't -- we didn't have anything like  
4 that.

5 Q. You worked on sharpening the --

6 A. Yeah, sharpening the tools.

7 Q. Did you have some chemicals for cooling  
8 them when you were sharpening them?

9 A. No. It was dry sharpening.

10 Q. And you didn't use any degreasers?

11 A. No. No.

12 Q. Would you -- if you smelled  
13 perchloroethylene, would you know what it was?

14 A. No.

15 Q. If you spelled tetrachloroethylene,  
16 would you know what it was?

17 A. Yeah, I've seen that. One of the  
18 shops -- the one that I used to work part time in,  
19 they used to use it to clean their parts.

20 Q. And you would recognize that smell?

21 A. Oh, yeah.

22 Q. And how about carbon tetrachloride?

23 A. Yeah, that's what they used. I believe  
24 that's what they used, you know.

25 Q. Okay. Now, you made some marks on the

1 plan that's in front of you and I would like to  
2 use the red pen.

3 In answer to both of the other lawyers'  
4 questions you indicated with your finger the  
5 general area that you thought the barrel operation  
6 was in.

7 Could you make a circle that would indicate  
8 all the area that you thought was the barrel  
9 operation?

10 A. This here. This here. (Indicating.)  
11 This is what I considered the barrel operation.

12 Q. And the --

13 A. Like I said, I -- I never had occasion  
14 to come way down here so I don't know.

15 Q. Now, you wrote the word "Dump"?

16 A. Yeah. Well --

17 Q. Let me ask the question. The dump is  
18 inside the red oval right now. Did the dump  
19 extend further to the south?

20 A. Well, it was in this area, you know.

21 Q. Did it go further south of that area?

22 A. It is possible.

23 Q. Your best memory.

24 MR. RAY: Objection.

25 MR. BAUER: Objection.



1           A.    I don't recall this -- this is a  
2 building here.

3           Q.    And that map is 1965.

4           A.    I don't -- I don't recall that.

5           Q.    This map is 1965.  And you last were on  
6 the site in what year approximately, 1963?

7           A.    '63 probably.

8           Q.    So it's possible that building wasn't  
9 there --

10          A.    Yes.

11          Q.    -- the last time you were there?

12               MR. BAUER:  Objection.

13          A.    Well, I don't recall it.

14          Q.    You don't recall seeing the building?

15          A.    No.

16          Q.    And if the building were there, you  
17 would have seen it?

18               MR. BAUER:  Objection.

19          A.    Well, yeah.  It's possible but I --  
20 right now I can't recall it.

21          Q.    Okay.  Well, you went on the site to  
22 fires and burning things and so on?

23          A.    Well, we went in, did our job and went  
24 out.

25          Q.    Okay.

1 A. We didn't -- we didn't do much else.

2 Q. Okay. So you remember there was a  
3 building indicated here inside the oval --

4 A. Yes.

5 Q. -- the red oval?

6 A. Yes.

7 Q. And you remember there was the old mill  
8 building?

9 A. Mill building.

10 Q. But you don't remember a building --

11 A. No.

12 Q. -- indicated by the square?

13 A. No.

14 Q. Could you put a circle around the  
15 square?

16 A. (Witness complying.)

17 Q. And would it be correct you never saw a  
18 building inside that?

19 A. I do not recall a building there.

20 Q. Okay. Would you put a letter "A"?

21 A. "A"?

22 Q. "A", yes.

23 A. (Witness complying.)

24 MR. PIROZZOLO: Thank you.

25 Q. Now, assuming for a moment there was no

1 building there, would it be your memory that the  
2 dump extended farther south and probably into the  
3 area of the building --

4 MR. BAUER: Objection.

5 MR. RAY: Objection.

6 Q. -- or do you know one way or another?

7 A. No, I couldn't tell you that.

8 Q. You couldn't tell?

9 A. No.

10 Q. Now, the soil on the outside where you  
11 said there was a barrel-cleaning operation, did  
12 the soil have natural earth color or did it  
13 have --

14 A. Oh, I wouldn't remember that.

15 Q. Well, do you recall it being like a  
16 place where you would grow your garden?

17 MR. RAY: Objection.

18 MR. BAUER: Objection.

19 A. I don't think so.

20 Q. Do you recall --

21 A. I don't think so.

22 Q. -- if there was residue of chemicals?

23 A. Yeah, it was --

24 MR. RAY: Objection.

25 A. -- it was a messy area, you know.

1 Q. And by "messy" --

2 A. Generally speaking, it was a messy area.

3 Q. I want to get into that a little more.

4 By "messy," would it be --

5 A. Unkempt.

6 Q. Would it be your memory that the sand or  
7 earth or gravel was stained with chemical?

8 MR. RAY: Objection.

9 A. Yeah, you know.

10 Q. And you remember there were barrels in  
11 this area?

12 A. Oh, yeah.

13 Q. And you remember there was other debris  
14 in the area or is it just barrels that you  
15 remember?

16 A. Well, they might have had, you know,  
17 pieces of wood here and there but generally  
18 speaking barrels.

19 Q. They were generally barrels?

20 A. Yeah. Like I said, it wasn't my job to  
21 check the area. Our job was we went in, we were  
22 called in on an emergency call, we went in, did  
23 our job and went out. That's it.

24 Q. We're just asking you what you remember.

25 A. Okay.

1 Q. Do you remember whether the barrels that  
2 you saw in that area were on their sides or  
3 standing straight up?

4 A. I've seen both. I've seen both.

5 MR. PIROZZOLO: Thank you.

6 Q. Now, you said that the barrel operation  
7 was done -- some of it was done outside?

8 A. Uh-hum.

9 Q. At least some of it?

10 A. Yes.

11 Q. Let me rephrase the question. You  
12 testified that at least some of the barrel  
13 operation was done outside?

14 A. Yes.

15 Q. And is it your testimony there were some  
16 machines outside?

17 A. Yes.

18 Q. Could you give us your best memory of  
19 how many machines?

20 A. I couldn't tell you. I couldn't tell  
21 you.

22 Q. Now, you wrote "pulverizing" on one of  
23 your reports and one of the lawyers asked you  
24 about that.

25 Do you know whether the word "pulverizing"

1 that you used in connection with that machine --

2 A. Did I use that word --

3 Q. -- was that --

4 A. -- or that John used that word?

5 MR. PIROZZOLO: I'm not sure. Let's  
6 just look.

7 THE WITNESS: Safety valve, metal  
8 stripping chemicals. Yes, pulverizing. To tell  
9 you the truth right now, I cannot recall why I  
10 called it a pulverizing machine.

11 Q. Let's go step by step. I'm looking at  
12 Exhibit 8. Are you looking at Exhibit 8?

13 A. 8?

14 Q. 8. And it's written here: "Metal  
15 stripping chemicals run through a pulverizing  
16 machine." Do you see that?

17 A. Uh-hum.

18 Q. Okay. Did you write that?

19 A. Yes.

20 Q. Okay. That's your writing?

21 A. Yes.

22 Q. And did you -- I think you testified  
23 that you understood that the barrel reclamation  
24 operation had some kind of a shot machine where  
25 they would use shot to clean barrels?

1 MR. BAUER: Objection.

2 MR. RAY: Objection.

3 A. They -- I would call it sandblasting.

4 Q. Sandblasting. Okay.

5 A. Now, that's what I thought the operation  
6 was. Where I got this pulverizing machine is  
7 beyond me. I can't -- I can't recall.

8 Q. Is it your best memory that the machine  
9 that overheated was the sandblasting machine?

10 A. Was the sandblasting machine.

11 Q. That's what you remember?

12 A. Yes. As far as I can remember.

13 Q. And for some reason you called it a  
14 pulverizing machine?

15 A. Yeah. I don't recall -- yeah. I don't  
16 understand that.

17 Q. Thank you.

18 A. It says here: "Metal stripping  
19 chemicals run through a pulverizing machine.  
20 Machine overheated. Chemicals caught fire.  
21 Slight damage to the machine."

22 The fire wasn't, you know, very large by what  
23 we see, you know.

24 MR. RAY: Move to strike.

25 BY MR. PIROZZOLO:

1 Q. Is it your best memory that that machine  
2 was outside?

3 A. Well, now in looking at this here, I  
4 don't know why we were -- we were inside, we went  
5 in the building.

6 Q. All we can ask you is your best memory.

7 A. Well, I'm going by this report. We  
8 used -- we used an air mask, we used a smoke  
9 ejector and I've got to assume that that was in  
10 the building.

11 Q. And that would have been this  
12 building --

13 A. That would be the big building.

14 Q. -- inside --

15 A. Right.

16 Q. Let me ask the question. That would be  
17 the building inside the red oval --

18 A. Yes.

19 Q. -- that you drew?

20 A. Yes.

21 Q. Now, let's go back to the outside of the  
22 building.

23 Do you remember any kind of machine that was  
24 used to burn barrels? Barrels were put on a  
25 machine and heat was applied?



1           A.    No, I didn't know what they -- I know  
2 they had a couple of machines outside that they  
3 ran the barrels through but I couldn't tell you  
4 they were burning or what they were doing.

5           Q.    Did you ever see a machine that heated  
6 barrels to a high temperature?

7           A.    I would assume that's what they did but  
8 I can't -- I can't tell you.

9           Q.    You don't recall seeing that operation?

10          A.    No, I didn't see the operation.

11          Q.    But you do recall seeing machines  
12 outside?

13          A.    Yes. Uh-hum.

14          Q.    How about a conveyor, did you see any  
15 conveyor outside?

16          A.    No.

17          Q.    Did you ever see a kind of machine that  
18 would re-form barrels outside?

19          A.    Yeah.

20          Q.    You saw that outside?

21          A.    Well, that's what they told me they did,  
22 you know, and I don't know nothing about it but...

23          Q.    When you say they told you, those people  
24 who worked --

25          A.    Walter Murphy.

1 Q. And did Walter Murphy work for New  
2 England Container?

3 A. He -- I couldn't -- like I stated  
4 before, I don't know who -- he worked there.

5 Q. He worked at the site?

6 A. I don't know, you know, what -- I don't  
7 know what his job was really. He drove trucks  
8 sometimes but he was around the plant a lot, you  
9 know.

10 Q. And Walter Murphy was the person you  
11 would see to get barrels when you wanted barrels?

12 A. Yes.

13 Q. And did he seem to be the person who had  
14 the authority to give you a barrel when you were  
15 looking for one?

16 A. Uh-hum.

17 Q. Did you pay for the barrels?

18 A. No.

19 Q. Okay. And when you would pick up a  
20 barrel or get a barrel from Walter Murphy, how did  
21 you carry it home?

22 A. I had a pickup truck.

23 Q. So would Walter Murphy help you put it  
24 on the pickup truck?

25 A. Oh, I don't know. I don't remember.

1 No. He just told me, you know, here's a barrel,  
2 throw it to the side, you know, take it and I  
3 just --

4 Q. Did you do that yourself?

5 A. Yes. Okay.

6 Q. Now, you said several times that you saw  
7 or smelled or perceived somehow chemicals on the  
8 site, is that right?

9 A. Yes.

10 Q. Can you say whether any one of those  
11 chemicals was 2,3,7,8-TCDD?

12 A. No.

13 Q. Can you say whether any one of those  
14 chemicals was dioxin?

15 A. I couldn't tell you any name of the  
16 chemicals.

17 Q. Could you say whether any of those  
18 chemicals were chemicals that contained dioxin?

19 A. No, I wouldn't -- I wouldn't know that.  
20 No.

21 Q. I'm going to invite your attention back  
22 to the circle that you marked "A".

23 Do you ever recall in the vicinity of the  
24 circle you marked "A" a building that the people  
25 there called the Texas Tower?

1 A. No.

2 Q. Do you recall any building there that  
3 looked like a tower?

4 MR. RAY: Objection.

5 A. No.

6 Q. You grew up in this area?

7 A. Yes.

8 Q. Did you -- when you were a child, did  
9 you play in this area at all?

10 A. Next to the -- let's see -- here --  
11 there was a ball field here. We used to play  
12 baseball and football. There was a grandstand  
13 right here when I was growing up.

14 There was amateur football games on Sunday  
15 afternoons there and baseball games and they had a  
16 grandstand.

17 Q. Could you put a letter "B" in the area  
18 that you just pointed to?

19 A. This store here -- well, it's in this  
20 general vicinity here. I don't know.

21 Q. Put a "B" inside the circle.

22 A. We'd come in from here, you know, and it  
23 would be all this area here.

24 Q. Can you put the letter "B" in the  
25 circle? And if you'd put an arrow on the line you

1 drew to say how you got in.

2 A. (Witness complying.)

3 Q. Would it be fair to say that area was --

4 A. We would come in from here.

5 Q. "Here" being Smith Street?

6 A. When I was real young, this building  
7 wasn't even here. This was -- there was a gas  
8 station there and we used to come in from the side  
9 here and the ball field was -- the ball field was  
10 there.

11 Q. Just so the record is clear on what you  
12 mean by here, put an "H" to where you are  
13 referring to here.

14 A. (Witness complying.)

15 Q. So you would come in in the vicinity of  
16 the "H" --

17 A. Yes.

18 Q. -- follow the arrow to "B" and there was  
19 a ball field?

20 A. And there was a ball field there.

21 Q. And was the rest of that area open area?

22 A. Yes. This was all -- all open, yeah.

23 Q. What years are we talking about?

24 A. Oh, God.

25 Q. Would that have been before 1940?

1           A.    Oh, yeah.  Yeah.  I was born in -- let's  
2 see -- '27 so in the thirties.

3           Q.    That would have been in the thirties?

4           A.    Yes.

5           Q.    Was the Centredale mill still operating  
6 at that time?

7           A.    No.  I can't -- no, I can't remember.  
8 Actually the textile mill -- there's some other  
9 shops that went in there but the textile mill I  
10 think was closed.

11          Q.    You don't remember the textile mill  
12 actually operating?

13          A.    No.

14          Q.    There's an area that's labeled on this  
15 chart "Tailrace"; do you see that?

16          A.    This here?

17          Q.    Yes.  And that continues up to the old  
18 mill building.  Do you know what the tailrace was?

19          A.    No.

20          Q.    Do you remember when you played ball  
21 there that there was a brook or a stream or a  
22 waterway?

23          A.    No.  No, I don't.

24          Q.    You don't remember playing in the water,  
25 fishing in the water --

1 A. No. No.

2 Q. -- anything like that?

3 A. No.

4 Q. No?

5 A. We just went down there --

6 Q. Just played ball?

7 A. -- watched ball games and that was it.

8 Q. Where was the grandstand?

9 A. Well, let's see, this was a building  
10 there. It had to be in this area here  
11 somewhere --

12 Q. Okay. Could you draw --

13 A. -- because this -- this building was not  
14 here. These buildings were not here.

15 Q. Could you put an "X" in the --

16 A. The grandstand was in here somewhere.

17 Q. Could you put an "X" where -- where you  
18 said the buildings were not there?

19 A. This here. (Indicating.)

20 Q. This one?

21 A. This one here, I'm trying to think.

22 Q. How about this one and this one?

23 A. There was an arcade building, I believe,  
24 this one here, and then there was -- these two  
25 buildings, these buildings weren't here. There

1 was a gas station here.

2 Q. Okay.

3 A. Clark's.

4 Q. You are now talking about the 1930s?

5 A. Yes.

6 Q. Why don't you write "Gas" for the gas  
7 station?

8 A. Well, it would be along here.

9 (Indicating.)

10 Q. Was the A & P in that area that you  
11 worked at?

12 A. No. A & P was -- 2026 -- in here.

13 Q. Could you write A & P there?

14 A. (Witness complying.)

15 MR. PIROZZOLO: Thank you.

16 Q. And is it your testimony that you do not  
17 remember any barrel operation here?

18 A. No. No.

19 Q. Can you put a circle around the area  
20 that I just asked you about?

21 A. This whole area here.

22 Q. I'll tell you what. I'll make the  
23 circle. And I'll put the letter "C" in that  
24 circle.

25 A. Yes.



1 Q. Is it your testimony you did not see any  
2 barrel operations --

3 A. No.

4 Q. -- in the area that I've marked "C"?

5 A. No, I don't know. I didn't.

6 Q. Even when you went there to play ball or  
7 anything, you never saw anything there?

8 A. Well, they weren't there then.

9 Q. Do you remember an old horse barn there?

10 THE WITNESS: A horse barn?

11 MR. PIROZZOLO: Yes.

12 A. No.

13 Q. Do you remember the -- whether the  
14 trolley cars were stored there?

15 A. No. The last trolley cars I remember  
16 going up to Centredale came up Woonasquatucket  
17 Avenue and stopped in front of St. Albans Church,  
18 where the St. Albans Church is.

19 Q. What was the last year that you remember  
20 the trolley cars running? Was it before you went  
21 in the Navy or after?

22 A. Oh, yeah. Oh, yeah.

23 Q. They stopped before you went in the  
24 Navy?

25 A. They stopped, yeah. Then they went to

1 what they call the trackless trolley. They had  
2 overhead wires on the buses.

3 Q. Right. And that continued while you  
4 were in the service?

5 A. That continued until I came back from  
6 the service I guess.

7 Q. Okay.

8 A. Then they discontinued those.

9 Q. Now, you are not old enough to remember  
10 horse-drawn trolleys?

11 A. No.

12 Q. But you don't remember a barn in that  
13 area that I drew a circle around and marked "C"  
14 that was used for horses?

15 A. No, I don't.

16 Q. Anybody ever tell you about that, that  
17 that area was used for horses?

18 A. I don't know.

19 Q. Never heard of that?

20 A. Never heard of it, no.

21 MR. PIROZZOLO: Okay. Just give me a  
22 minute. I don't think I have any more questions.  
23 Let me just review my notes.

24 ( P A U S E )

25 BY MR. PIROZZOLO:

1 Q. Would it be correct to understand that  
2 in the area that you circled in red as the NECC  
3 operation that you did smell chemical?

4 A. Oh, yeah. If you were in there, yeah.  
5 If you were in that area you would -- you know,  
6 when we came in, like I said, we came in, did our  
7 job and we left.

8 Q. And you would smell chemical there?

9 A. Yes, you could.

10 MR. PIROZZOLO: I'm just going to draw  
11 an arrow to that.

12 MR. BAUER: Could we have the witness  
13 draw on the map? I object to counsel drawing on  
14 the map.

15 Q. Okay. I just drew the arrow. Could you  
16 indicate "NECC" at the end of the arrow?

17 MR. RAY: Objection.

18 A. Could I indicate what?

19 Q. Just write "NECC" at the end of the  
20 arrow.

21 MR. BAUER: Objection.

22 A. What's that?

23 Q. The arrow is pointing to the circle.

24 A. Uh-hum.

25 Q. Just write -- did you call that the

1 barrel operation?

2 A. Yes. This arrow.

3 Q. All right. Write "Barrel Operation" so  
4 we will know.

5 A. (Witness complying.)

6 Q. What have you written there?

7 A. "Barrel Operation."

8 Q. And the arrow runs to the oval in red?

9 A. Yes.

10 Q. Okay. And you already told us what's  
11 inside the oval in red, is that right?

12 A. Yep.

13 Q. And that's what you observed as the  
14 barrel operation?

15 A. Yes.

16 MR. PIROZZOLO: I have no further  
17 questions.

18 MR. RAY: Scott?

19 MR. BAUER: Nothing.

20 MR. RAY: I just have one quick  
21 follow-up.

22 EXAMINATION

23 BY MR. RAY:

24 Q. Could you find Exhibit 8 again, Mr.  
25 Sparadeo?

1 A. Okay.

2 Q. Now, do you have Exhibit 8 in front of  
3 you?

4 A. Yes.

5 Q. Now that indicates that you used two  
6 Scott Air-Paks --

7 A. Uh-hum.

8 Q. -- hand lights and several other things,  
9 correct? Is that correct?

10 A. Yes.

11 Q. And am I to understand correctly that  
12 you had -- withdrawn.

13 It also indicates on the right-hand side near  
14 the top under "Make of Fire" it says, "Building"  
15 and then below that, "Overheated Mach"; do you see  
16 that?

17 A. Yes.

18 Q. Do you interpret that to mean that the  
19 incident took place in the building?

20 A. Yes, after -- after reading -- looking  
21 at this, yes, because the equipment we used would  
22 be -- if it was outside, we wouldn't use that.

23 Q. Okay. And do I understand correctly  
24 that you believe this was in the barrel building  
25 that --

1 A. In the barrel building, yes.

2 Q. So the machine that's referred to in  
3 here, am I correct that the machine would be  
4 inside the building --

5 A. Yes.

6 MR. PIROZZOLO: Objection.

7 Q. -- as well?

8 A. Yes.

9 Q. So am I correct that it would not be one  
10 of the machines that you observed outside?

11 A. No. No.

12 MR. RAY: Nothing further.

13 MR. PIROZZOLO: All set.

14 MR. BAUER: All set.

15 MR. PIROZZOLO: No further questions.

16 MR. BAUER: You are free to go.

17 MR. RAY: Thank you, Mr. Sparadeo.

18 MR. BAUER: Thank you very much for  
19 coming in.

20 (Adjourned at 12:25 p.m.)

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25

1 STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
2 KENT, Sc.

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

4 I, VIVIAN S. DAFOULAS, Registered Merit  
5 Reporter/Certified Realtime Reporter, Notary  
6 Public in and for the State of Rhode Island, do  
7 hereby certify that the witness was first duly  
8 sworn to tell the truth, the whole truth and  
9 nothing but the truth in the matter of EMHART  
10 INDUSTRIES, INC., vs. NEW ENGLAND CONTAINER  
11 COMPANY, et al.; that I am in no way related or  
12 have any interest in said matter and that the  
13 testimony of said witness was duly recorded by me  
14 in computerized stenotype and is a true and  
15 accurate transcription of my notes.

16 IN WITNESS WHEREOF, I have hereunto set  
17 my hand this 10th day of June, 2013.

18  
19 -----  
20 Vivian S. Dafoulas, RMR-CRR  
21 East Greenwich, RI 02818  
22 (401) 885-0992

23 READING AND SIGNING OF THE TRANSCRIPT WAS NOT  
24 REQUESTED BY THE DEPONENT OR ANY PARTIES INVOLVED  
25 UPON COMPLETION OF THE DEPOSITION.

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