

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Allied Textile Printing RV3 - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #1  
Initial  
Allied Textile Printing RV3  
A23F  
Paterson, NJ  
Latitude: 40.9171816 Longitude: -74.1790350

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**From:** Colleen Grell, OSC

**Date:** 12/12/2024

**Reporting Period:** 8/20/2024 – 10/16/2024

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	A23F	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/20/2024
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>		<b>Operable Unit:</b>	RV3
<b>Mobilization Date:</b>	9/5/2024	<b>Start Date:</b>	9/16/2024
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NJD002523801	<b>RCRIS ID:</b>	NJD002523801
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Asbestos and lead release in an abandoned industrial facility.

#### 1.1.2 Site Description

In May 2013, the EPA Region II Removal Action Branch (RAB) received a request from the EPA Brownfields Section to assist the City of Paterson, New Jersey, by evaluating the Allied Textile Printing Site (ATP Site) for removal action consideration in accordance with the Comprehensive Environmental, Response, Compensation, and Liability Act of 1980, as amended (CERCLA). The ATP Site is part of a large industrial

complex constructed in the early 1900s, which occupies approximately seven acres of land and at one time contained an estimated 40 buildings. The remaining buildings are severely deteriorated and have suffered floor/roof collapses as the result of neglect and fire. Many of the buildings have been razed since the industrial complex was abandoned in 1983.

Site visits were previously conducted by RAB personnel and the EPA Region II Superfund Technical Assessment and Response Team (START) contractor after the City of Paterson provided consent to access the property. EPA conducted visual inspections only during these visits. The conditions of the remaining structures at the ATP Site were observed without entries due to their poor structural integrity. Most are heavily damaged and either have no roofs or partial roofs and were open to the elements. The ATP Site is fenced along the perimeter. There is ample evidence that the ATP Site is frequented by various persons, as trespassers have been observed inside the fenced area of the property.

The ATP Site is heavily overgrown with vegetation during the growing season in both open areas and in areas where buildings and slabs of former buildings are present. It has reportedly been cleared on multiple occasions; however, trees, brush, undergrowth and extensive poison ivy have overtaken these areas. During the warmer months, the tree line and vegetation near the street significantly limit any observations onto the ATP Site.

#### **1.1.2.1 Location**

The Site is located at 1 Van Houten Street in the City of Paterson, Passaic County, New Jersey, 07505. It consists of an approximately 7-acre property (Block H4601, Lots 4, 5, 9, 10, and 11), formerly utilized by a variety of industrial companies from the early 19th century until 1983. The

Site is bound by the Passaic River from the north to the southwest; residential apartments to the

northeast; Van Houten and Mill Streets to the east; residential apartments and an office building to the southeast; and two outdoor parking lots and an overlook to the south on higher ground located in the Paterson Great Falls National Historic Park. The Quarry Lawn Park is to the southwest. The street

frontage at the Site spans nearly 400 feet from the western end of Magee's Alley until just after the

point to the west where Van Houten Street curves and becomes Mill Street. Except for the southern

end, the Site is generally 350 feet to 400 feet wide, from the street to the Passaic River. The western

end of the Site spans approximately 1,200 feet along the Passaic River.

Remnants of a raceway that was used to provide water diverted from the Passaic River above the

Great Falls to the industries in the area are evident along the eastern edge of the Site and to a lesser

extent within the Site. Three bridges over the Lower Raceway provide access to the Site from Van

Houten Street.

A portion of the area around the Site was designated a National Historic Landmark (NHL) District in 1976. The NHL District covers 89 acres on both sides of the Passaic River. The Great Falls Raceway and power systems were placed on the List of Historic Civil Engineering Landmarks in 1977. In 1988, the area was listed as a Priority 1 Threatened NHL District. The Great Falls National Historic Park was created in 2009.

#### **1.1.2.2 Description of Threat**

Actual and threatened releases of hazardous substances at the ATP Site have been documented. The

current Site conditions and past investigations indicate there has been a release of a CERCLA designated hazardous substance at the ATP Site, which is a facility as defined under Section 101(9) of CERCLA. The asbestos containing material (ACM) was found to be in friable condition and was observed to be scattered on building floors, walls, windowsills, pipes, ducts, and on other equipment within the buildings. Much of the ACM is damaged and degrading due to age and exposure to the

elements. The ACM, much of which has severely deteriorated, has been observed hanging from pipes and other equipment swinging in the wind. Bulk asbestos has also been documented on the ground and hanging from pipes outside the buildings.

The mechanisms for past releases to the environment include the effects of fires, firefighting, and

weathering of the ACM on the extensive interior piping and equipment, air emissions, discharges onto the ground surface and lack of facility maintenance. The deterioration of the ACM has resulted in releases to the environment. There are several openings in the buildings at the Site through which asbestos fibers can be released, and without regular repairs the buildings will continue to deteriorate. Adverse weather and numerous fires have also contributed to the deterioration of the buildings at the Site. The roofs of all the subject buildings are either partially collapsed or totally gone, as are some of the building walls. All the windows and doors of all the buildings are gone, which provides an avenue for both ACM migration and trespassers. The lack of building maintenance, weather conditions and trespassing will result in continued building wall and roof collapse. These conditions will promote the continued release from wind blowing through the building and onto the shoes and clothing of trespassers entering the buildings. The most significant human exposure pathway for asbestos is the inhalation of respirable asbestos fibers. Once released, asbestos fibers can remain in suspension for long periods and can be transported long distances. People in nearby residential communities and commercial areas could possibly be affected.

Three decrepit boilers in building 14 are rusting away exposing the inner portions of the boiler thereby

exposing the insulation, heat exchange pipes and ash. The ash of these boilers is falling out of these corroded openings as well as maintenance and observation ports on different parts of each boiler. Samples of this ash were analyzed and Toxicity Characteristic Leaching Procedure (TCLP) results found lead at levels exceeding the RCRA TCLP threshold value of 5 milligrams per liter (mg/L). The mechanisms for past discharges onto the ground surface include a lack of facility maintenance allowing the boilers' outer jacket to corrode away exposing the contaminated ash within as well as the ports and hatches being allowed to be opened and/or destroyed. These mechanisms are further compounded by the deteriorated state of the facility and the continuing deterioration due to weather exposure. Activities of people within the site buildings have caused a further release of ash from inside the boiler into the environment. Building 14 is located on the edge of the bank of the Passaic River. A direct migration pathway exists through the missing wall on the north side of the building 14 to the Passaic River.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

The initial Removal Site Evaluation (RSE) addressing the entire ATP Site was finalized on April 2, 2015. EPA and its technical contractors (START) jointly conducted a reconnaissance of the ATP Site in and around buildings 14, 14A and 16. All of the buildings share common walls as one contiguous structure.

Building 16 contained five Above-Ground Storage Tanks (ASTs). Parts of at least two of the tanks had been cut out exposing the interiors of those tanks. Suspected asbestos containing material (SACM) was observed on the floor of the west wall between two of the tanks and on an overhead pipe.

The building 14 windows on the south and west sides were completely destroyed. The wall on the east side of the building north of building 16 was almost completely gone from the floor to the roof. The building roof had collapsed and debris including trash, clothes, ash, pipes, machine parts and remnants of the roofing material were observed throughout the building floor. Suspected ACM (SACM) was observed mixed with the floor debris. Three boilers observed in building 14 were identified from east to west as boilers 1 through 3. A tank and associated piping was observed on top of each boiler. SACM was observed on top of each of the tanks and their piping. SACM was also observed within corroded sections of the boiler's metal jacket. Ash was observed falling out of the three boilers at cleanout ports and through damaged portions of the boiler and on the surrounding ground at the base of each boiler. SACM was observed on the floor around the three blower motors that were associated with each boiler. The SACM observed on the floor was suspected to have sloughed from overhead piping. SACM was also observed on the floor next to boiler 1 at the southeast corner of the building.

Deteriorated SACM was observed on overhead piping throughout the building. SACM was observed on an overhead duct connecting the boiler's exhaust to the smokestack. Ash was also observed in the smokestack cleanout

SACM was observed on the ground adjacent to the exterior building 14 west wall. SACM was also observed on piping approximately ten feet from the ground along the south wall of the building and on the ground mixed with debris. To the west of Open Room 1 was another room Open Room 2 also with a totally collapsed ceiling.

On the northern exterior wall of the building identified as the Western Building Tank Room, SACM was observed on an overhead pipe approximately nine feet from the ground and on another overhead pipe immediately west of the aforementioned pipe approximately five feet from the ground. Several ASTs were observed in the Western Building Tank Room. A partially buried open top 55-gallon steel drum without a lid in the northwest corner of this room was observed to contain SACM.

The roof of building 14A was severely damaged and large holes were present in the walls. The floor was covered with debris, some of which was fallen roof material. A partially walled sub-room with a

precariouly collapsed roof was present in the building. SACM was observed on overhead piping along the south wall inside the sub-room. SACM was observed mixed with the debris on the floor. A vessel adjacent to the north wall surrounded by a half wall also contained SACM.

A total of 28 bulk SACM samples were collected in and around buildings 14, 14A, and 16 for polarized light microscopy (PLM) and transmission electron microscopy (TEM) analysis. Sixteen SACM samples were collected from building 14, three from building 14A, three from building 16, and a total of six samples were collected from Open Rooms 1 and 2, the Western Building Tank Room and outside the buildings on the ground. Asbestos was detected in 16 of the 28 samples collected for analysis. Asbestos often occurred as combinations of chrysotile, amosite, and crocidolite in varying ratios. Aside from the twelve non-detects, the concentrations ranged from 2% amosite, 2% chrysotile and 2% crocidolite to 35% amosite, 85% chrysotile and 20% crocidolite.

Analysis of samples collected from bulk asbestos laying on the ground outside of building 14 at several locations indicated 80% chrysotile, 15% amosite and 20% crocidolite.

A total of five ash samples, which included one duplicate sample, were collected from the three boilers and one ash sample from the smokestack cleanout for TCLP inorganic analysis. The boiler samples were collected from ports/cleanouts except for P001-ASH003-01, which was collected from the exposed boiler 2 heat exchange pipes and showed a lead concentration of 9.36 milligrams per liter (mg/L). This was the only

ash sample which had an exceedance of the EPA TCLP Maximum Contaminant Concentration (40 CFR 261.24), which for lead has a threshold limit of 5 mg/L. It is important to note that lead results in a second ash sample was reported at 4.99 mg/L (boiler 1).

There are residential properties within 300 feet of the Site, and visitors to the newly constructed Quarry Lawn Park will be within 81 feet of Building 14 of the Boiler House complex when the park opens to the public. During an April 18, 2024, Site visit EPA observed breaches in the fence along Van Houten Street and newer bicycles within 20 yards of the Boiler House Complex indicating recent trespassing activity. The planned removal action is needed to mitigate the risk to the public from migrating friable asbestos from the deteriorating structures.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

The purpose of this removal action is to eliminate the threat of direct contact, active release into the environment and off-site migration of friable ACM from deteriorated insulation and lead from the boiler ash at the Site. Removal activities will focus on buildings 14, 14A, and 16. Partial deconstruction of the building 14 smokestack is required due to its instability. Bracing will be installed on the Colt Gun Mill to preserve it and minimize damage during removal activities. Perimeter air monitoring and sampling will be conducted during site activities. Quarry Lawn Park is anticipated to remain closed to the public during removal operations.

#### **2.1.2 Response Actions to Date**

Access to the property for EPA to conduct the Removal Action was granted by the City of Paterson on July 1, 2024. The Action Memorandum authorizing the removal was signed on August 20, 2024.

On September 5, 2024, two EPA On Scene Coordinators (OSC) and their contractor mobilized to site to conduct a site walkthrough to survey the location and current conditions of the area where the removal action will occur. EPA worked with the National Park Service (NPS) to identify staging areas and access routes through Paterson Great Falls National Park, and also with the City of Paterson to allow access to the site through Quarry Lawn Park.

On September 11, 2024, two OSCs met with an inspector from NJ Department of Labor (NJDOL) to conduct a site walkthrough and discuss measures required to safely remove the asbestos.

On September 16, 2024, one OSC and two technical contractors (START) mobilized to the Site to conduct background air monitoring and sampling prior to the start of the removal action. Photo documentation of site conditions and Quarry Lawn Park features was conducted.

On September 17, 2024, two OSCs, START personnel, and ERRS contractors mobilized to the Site to establish site facility command post/decontamination areas and work and exclusion zones. Office trailers and equipment were delivered to the Site. The command post facilities are staged in the parking lot of Paterson Great Falls National Park and entry into the Site will be through Quarry Lawn Park, which is closed to the public. The decontamination facility was deployed in Quarry Lawn Park near the site access.

From September 18, 2024 through October 16, 2024, work consisted of preparatory activities including site perimeter fence repair, installing temporary fencing around the work zones, clearing vegetation, moving previously bundled stone that would impede entrance from Quarry Lawn Park into the site, and moving loose stone that would inhibit future installation of bracing around in the Colt Gun Mill Building. Stone originating from what is now the Quarry Lawn Park that had been stored near building 14 was washed and moved to an off-site location. Vegetation was cut to allow access and afford a better view of the work area and allow access. Stone originating from the Colt Gun Mill Building was carefully collected, washed, and moved to other areas of the site for storage. Vegetation samples were collected and analyzed for asbestos for disposal purposes. Samples were collected from two debris piles near the entrance into Quarry Lawn Park and analyzed for asbestos.

During all site activities, air monitoring for particulates with a diameter of 10 microns or less, known as PM10, was conducted at strategic locations around the perimeter of the site for protection of the public. No exceedances of air monitoring action levels due to possible dust generated from on-site removal activities were detected during September 16, 2024 through October 11, 2024. Weekly air monitoring summaries are available at the EPA's website: [https://response.epa.gov/site/site\\_profile.aspx?site\\_id=16653](https://response.epa.gov/site/site_profile.aspx?site_id=16653). Air samples were also collected at each of these location for analysis via phase contrast microscopy (PCM) and TEM to confirm that dust suppression measures to minimize asbestos release off-site are effective. From September 16 through 20, 2024, samples were analyzed only via PCM and showed no detections of fibers. Had fibers been detected, samples would have then been analyzed via TEM to specifically identify asbestos fibers. From September 23, 2024 through October 16, 2024, samples were analyzed via both PCM and TEM. Validated analytical data from the air samples collected during this time period shows no detections of fibers.

Bids for an asbestos (NESHAP) survey were received and a subcontractor was selected; the survey was tentatively scheduled to take place during the week of October 21, 2024 and was necessary to locate specific materials containing asbestos to be removed. Bids for disposal of the vegetation were received and

a subcontractor was selected; disposal of cut vegetation was expected to occur in November 2024. As of the release date for this PolRep, a Request for Proposal (RFP) for demolition of the building 14 smokestack is in review.

Public outreach continues at the nearby residential apartment buildings. The EPA Community Involvement Coordinator (CIC) is coordinating with the tenant association president for the Phoenix, Congdon, and Essex Mills Buildings to have the fact sheets emailed to the tenants and having them available at the entrances to the building. The fact sheets are available on the Site's website (See Section 6.1 for link) in English and Spanish; it is in the process of being translated to Arabic. On October 7, 2024, NJ.com published an article about the ATP cleanup.

Site operations ceased from October 12 – 15, 2024 for the holiday weekend, and resumed October 16, 2024. Site preparation activities, including vegetation clearing and stone moving, are expected to continue through October 2024.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Preliminary PRP Search completion date is September 28, 2015.

The City of Paterson acquired the site as a result of a foreclosure proceeding against prior owner(s) for failure to pay real estate taxes and/or abandoning the site. On June 15, 1993, the Superior Court of New Jersey, Chancery Division, Passaic County, issued a Final Judgment granting title to the site in fee simple to the City of Paterson. The City has owned the site since then and remains the owner of the site at present.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

In order to mitigate the threats at this Site, the following actions are required:

- To ensure that Site structures do not pose a risk of collapse which would threaten the safety of Site workers, an invitation for bid will be issued for a structural engineer to evaluate the structural integrity of the building 14 smokestack, building 14, and building 14A and make recommendations for fortifying these structures.
- Structurally secure or demolish the building 14 smokestack, building 14 and building 14A as necessary to resolve safety hazards.
- Install bracing to stabilize and preserve the Colt Gun Mill Building.
- Remove, package, and dispose of friable ACM and SACM from buildings 14, building 14A, Open Room 1 and 2, on the exterior pipes attached to the Western Building Tank Room and from the ground west of building 14 and north of the Western Building Tank Room.
- Remove and containerize the contaminated ash from the three boilers in building 14 and the building 14 smokestack and all appurtenances of these structures.
- All hazardous substances identified and recovered during the course of the removal action will be shipped to an off-site disposal facility.
- Off-site disposal of hazardous waste and/or substances will comply with the Off-Site Rule, 40 CFR 300.440.
- All necessary activities will be conducted to ensure compliance with the National Historic Preservation Act of 1966, as amended (NHPA) and New Jersey's State Historic Preservation Office requirements.

2.2.1.1 Next Steps

- Continue to clear vegetation and move loose stone as needed for access to the work area.
- Continue to conduct perimeter air monitoring and sampling for community protection.
- Continue to work with NJDOL, NPS, City of Paterson, and stakeholders.
- Secure a subcontractor and conduct a subsurface utility survey to locate any underground utilities in the work area.
- Secure a subcontractor and conduct a geophysical survey to determine the location, size, and contents (if any) of two underground storage tanks located between building 14 and the Colt Gun Mill.
- Schedule the asbestos survey and assess findings.
- Solicit bids for dismantling of the building 14 smokestack.
- Secure a subcontractor to produce an asbestos mitigation plan.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

### **3.1 Unified Command**

No information available at this time.

### **3.2 Cooperating Agencies**

City of Paterson Historic Preservation Commission

National Park Service

New Jersey Department of Labor

## **4. Personnel On Site**

On September 5, 2024, 2 EPA OSCs and 1 ERRS contractor were on Site.

On September 11, 2024, 2 EPA OSCs and 1 NJDOL inspector were on Site.

On September 16, 2024, 1 EPA OSC and 2 START contractors were on Site.

From September 17 – October 16, 2024, there are 2 EPA OSCs, up to 2 START contractors, and 8 ERRS contractors on Site.

## **5. Definition of Terms**

ATP – Allied Textile Printing

EPA – Environmental Protection Agency

CERCLA - Comprehensive Environmental, Response, Compensation, and Liability Act of 1980

RAB – EPA Removal Action Branch

ACM – Asbestos-Containing Material

SACM – Suspected Asbestos-Containing Material

START – Superfund Technical Assessment and Response Team

NHL – National Historic Landmark

ERRS – Emergency Response and R Services

OSC – On Scene Coordinator

NPS – National Park Service

PRP – Potentially Responsible Party

NJDOL – New Jersey Department of Labor

RFP – Request for Proposal

CIC – Community Involvement Coordinator

POLREP – Pollution Report

NJDEP – New Jersey Department of Environmental Protection

PCM – Phase Contrast Microscopy

TEM – Transmission Electron Microscopy

NHPA – National Historic Preservation Act

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

[https://response.epa.gov/site/site\\_profile.aspx?site\\_id=16653](https://response.epa.gov/site/site_profile.aspx?site_id=16653)

### **6.2 Reporting Schedule**

Provide POLREPs weekly when EPA contractors are performing work onsite. Air monitoring summaries will be issued weekly. Air sampling analytical data will be released monthly upon completion of data validation.

## **7. Situational Reference Materials**

No information available at this time.