

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #2  
Progress  
Allied Textile Printing RV3  
A23F  
Paterson, NJ  
Latitude: 40.9171816 Longitude: -74.1790350

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**From:** Colleen Grell, OSC  
**Date:** 12/19/2024  
**Reporting Period:** 10/17/2024 – 10/25/2024

## 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

See POLREP 1.

##### 1.1.2.1 Location

See POLREP 1.

### 1.1.2.2 Description of Threat

See POLREP 1.

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

See POLREP 1.

## 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

See previous POLREP for additional response actions prior to October 17, 2024.

From October 17, 2024 through October 25, 2024, work consisted of preparatory activities including site perimeter fence repair, clearing vegetation, and moving loose stone that would inhibit future installation of bracing around in the Colt Gun Mill Building. 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. A large amount of debris and trash that appears to have been left behind by transients was also removed from the Colt Gun Building.

The area between the Quarry Lawn Park fence and the Colt Gun Building, just to the southeast of the former Building 19, was identified as a potential staging area for building materials during deconstruction of the Building 14 smokestack. Vegetation in this area was cleared for this purpose. A Request for Proposal (RFP) for the smokestack deconstruction is in review.

During all site activities, air monitoring for particulates with a diameter of 10 microns or less (PM10) was conducted at strategic locations around the perimeter of the site for protection of the public. Air samples were also collected at each of these location for analysis via PCM and TEM to confirm that dust suppression measures to minimize asbestos release off-site are effective. No exceedances of air monitoring action levels due to possible dust generated from on-site removal activities were detected during October 16, 2024 through October 25, 2024. On October 21, 2024, smoke from a fire at an off site building caused exceedances of action levels at two air monitoring locations; however, this is not attributable to on site removal activities and sample results from those locations show no detections of asbestos fibers for that day. Validated analytical data from the air samples shows that fibrous material was detected in air samples collected at two locations on October 23, 2024. The samples were analyzed via PCM, which detects fibers but does not differentiate between asbestos fibers and all other fibrous material. The samples were then analyzed via TEM, which is an asbestos-specific analysis; no asbestos fibers were detected in the samples during TEM analysis, which indicates that the fibers detected during PCM analysis were not asbestos. There were no other detections of fibers via PCM analysis and no detections of asbestos fibers via TEM analysis for October 16, 2024 through October 25, 2024.

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.

The asbestos (NESHAP) survey was conducted on October 24, 2024 to locate specific materials containing asbestos to be removed. Samples were collected from areas within the Boilerhouse Complex, Colt Gun Building, and Colt Gun Bridge. Results of the survey will be evaluated after receipt of the report.

ERRS completed the majority of site preparation activities were completed on October 25, 2024, and demobilized from the Site. Any additional site preparation actions will be completed during the next mobilization. Vegetation clearing was completed. Additional trash and debris remain in the Colt Gun Building. Contractors will return to the Site to collect the remainder of the debris before loading out waste to be sent to the selected disposal facility. The Site perimeter fence was repaired, and locks were secured before departure.

On October 25, 2024, EPA and START had a meeting to discuss the Colt Gun Building stabilization plan. A Site visit is anticipated for November 12, 2024, to determine if adjustments to the plan are needed. The OSC continues to coordinate with the City of Paterson and met with the Historic Preservation Officer on October 25, 2024.

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

See POLREP 1.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 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 and New Jersey's State Historic Preservation Office requirements.

#### 2.2.1.1 Next Steps

- Complete collection of trash and debris from the Colt Gun Building.
- Arrange for disposal of vegetation, debris, and trash. Collect and analyze samples for disposal facility selection.
- Conduct perimeter air monitoring and sampling for community protection during Site activities.
- Continue to work with NJDOL, NPS, City of Paterson, and stakeholders.
- Work with NPS and the City of Paterson to ascertain the requirements for the NHPA/HAER process.
- Secure a subcontractor and conduct a geophysical survey to determine the location, and size of two underground storage tanks located between Building 14 and the Colt Gun Building. Conduct a subsurface utility survey to locate any underground utilities in the work area.
- Identify contents (if any) of the underground storage tanks.
- Receive asbestos survey report and assess findings. Have an asbestos mitigation plan prepared once the survey report is received and submit to NJDOL.
- Review and finalize smokestack demolition RFP.
- Work with a structural engineer to finalize the stabilization design for the Colt Gun Building.
- Continue to conduct public outreach activities.

### 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

EPA OSCs, a START contractor, and ERRS contractors demobilized from the Site on October 25, 2024.

## 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  
NJDOLE – 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  
HAER – Historic American Engineering Record

## **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.