

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #3  
Progress  
Allied Textile Printing RV3  
A23F  
Paterson, NJ  
Latitude: 40.9171816 Longitude: -74.1790350

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**From:** Colleen Grell, OSC

**Date:** 1/16/2025

**Reporting Period:** 10/26/2025-1/10/2025

## 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 previous POLREPs.

##### 1.1.2.1 Location

See previous POLREPs.

1.1.2.2 Description of Threat

See previous POLREPs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See previous POLREPs.

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 for safety reasons. Bracing will be installed on the Colt Gun Mill for safety reasons and also to preserve the structure and minimize damage during removal operations. Perimeter air monitoring and sampling will be conducted during intrusive 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 POLREPs for response actions prior to October 25, 2024.

Results of the asbestos (NESHAP) survey, which was conducted on October 24, 2024, were received on November 12, 2024 and reviewed by EPA.

EPA and START conducted a Site visit on November 12, 2024 to evaluate whether adjustments to the Colt Gun Building Stabilization Plan are needed. The OSC continues to coordinate with the City of Paterson and provided the draft plan with the Historic Preservation Officer on December 16, 2024.

EPA met with representatives from the National Park Service (NPS) and the City of Paterson Historic Preservation officer on November 15, 2024 to discuss requirements for compliance with the Historic American Engineering Record (HAER). EPA is awaiting the Schedule of Documentation from NPS to identify next steps in the process.

The draft Asbestos Mitigation Plan was received on December 18, 2024. The plan was reviewed by EPA and comments were submitted to the contractor. The revised plan is currently in review.

The Request for Proposal (RFP) for partial deconstruction of the Building 14 smokestack was released on December 11, 2024. A Site walkthrough for prospective bidders was held on December 19, 2024. Proposals are due in January 2025. Due to the complexity of the project, additional time may be granted upon request of the bidders.

ERRS mobilized to the Site on January 6, 2025 to collect the remainder of the debris in the Colt Gun Building and remove waste from the area expected to be investigated during the subsurface survey. A vendor for transportation and disposal of the debris was selected in November 2024; however, disposal of the waste was not able to be scheduled during this mobilization. The subsurface survey was conducted January 8-10, 2024 with the objective to locate demarcate boundaries of underground storage tanks, utilities, or other subsurface obstructions which may impact Site operations. The Site perimeter fence was repaired, and locks were secured before contractor departure.

During intrusive 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. Debris collection conducted January 6, 2025 through January 9, 2025 was considered intrusive due to the movement of on-Site material. No exceedances of air monitoring action levels due to possible dust generated from on-site removal activities were detected during the intrusive activity. Air samples were also collected at each of these locations and submitted to a laboratory for asbestos analysis via both PCM and TEM to confirm that dust suppression measures to minimize asbestos release off-Site were effective. As of the time of release of this PolRep, analytical data was not yet received.

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

See previous POLREPs.

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:

- 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 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

- - Receive and review subsurface survey results.
  - Schedule disposal of vegetation, debris, and trash from the Site. Removal of the waste is anticipated to occur during the week of January 20, 2025.
  - Conduct perimeter air monitoring and sampling for community protection during intrusive Site activities.
  - Continue to work with NJDOL, NPS, City of Paterson, and stakeholders.
  - Work with NPS, City of Paterson, and an archeological subcontractor to ascertain the requirements for the NHPA/HAER process. Once the Schedule of Documentation is received, begin acquiring the necessary information.
  - Assess contents (if any) of the underground storage tanks.
  - Review and submit the draft asbestos mitigation plan to NJDOL. Finalize the plan upon NJDOL approval.
  - Review proposals for smokestack demolition and select a vendor.
  - Evaluate potential access routes for passage of heavy equipment and trucks for smokestack debris removal. Obtain approvals for modifications, if necessary.
  - Work with a structural engineer to draft the stabilization design for the Colt Gun Building. Work with stakeholders and legal counsel to finalize and approve design plans.
  - Evaluate options to secure underground storage tanks during Site operations.
  - 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

The EPA OSC and ERRS contractors were present at the Site January 6 through 10, 2025. A START contractor was present January 6 through 9, 2025. Two subcontractors were on-Site January 8-10, 2025.

## 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

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.