

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** **POLREP #4**  
**Progress**  
**Allied Textile Printing RV3**  
**A23F**  
**Paterson, NJ**  
**Latitude: 40.9171816 Longitude: -74.1790350**

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**From:** Colleen Grell, OSC  
**Date:** 1/28/2025  
**Reporting Period:** 1/11/2025-1/26/2025

## 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> 9/16/2024 | <b>Start Date:</b> 9/5/2024              |
| <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 operations 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 that involve moving materials originating from the Site. 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 January 11, 2025.

EPA met with representatives from the National Park Service (NPS) and the City of Paterson Historic Preservation officer on January 15, 2025 to discuss the Site history, planned work, and potential impacts to the Site. The information presented will support the determination of 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 revised Asbestos Mitigation Plan was received on January 21, 2025. The plan was reviewed by EPA and submitted to NJDOL on January 23, 2025.

Proposals were received for the partial deconstruction of the Building 14 smokestack on January 17, 2025 and are being reviewed. Bid documents were submitted to the EPA Region 2 Contracting Officer on January 24, 2025.

ERRS mobilized to the Site on January 21, 2025 to load out cut vegetation and debris for disposal. The debris consisted of general trash and refuse such as mattresses, clothing, bottles, and other items left by vagrants in the Colt Gun Building and the area that was investigated during the subsurface survey. Although the waste is not a result of asbestos abatement and the type of waste collected would not normally contain asbestos, it was classified as ACM for disposal purposes since there is a chance that it may have been contaminated with friable asbestos fibers. On January 21, 2025, equipment needed to complete the task was received and the road into Quarry Lawn Park was plowed. On January 22, 2025, waste was loaded into two lined trucks for transport to the receiving disposal facility. Once loaded into the trucks, the waste was covered and sealed to appropriately contain the material during transport and prevent public exposure. Perimeter air monitoring and sampling were conducted during waste loading activities.

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. 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 prevent asbestos release off-Site were effective. As of the time of release of this PolRep, analytical data was not yet received.

On January 22, 2025, EPA responded to a media inquiry regarding Site activities.

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

See previous POLREPs.

#### 2.1.4 Progress Metrics

| <i>Waste Stream</i> | <i>Medium</i> | <i>Quantity</i> | <i>Manifest #</i> | <i>Treatment</i> | <i>Disposal</i> |
|---------------------|---------------|-----------------|-------------------|------------------|-----------------|
| Trash & Vegetation  | Solids        |                 | 13958263          | Stabilization    | Landfill        |
| Trash & Vegetation  | Solids        |                 | 13958264          | Stabilization    | Landfill        |
|                     |               |                 |                   |                  |                 |

### 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**

- Finalize the asbestos mitigation plan upon NJDOL approval.
- Select a subcontractor for deconstruction of the Building 14 smokestack.
- Review plans and pursue approvals required to begin work on the Building 14 smokestack.
- Begin Site preparations as required prior to smokestack deconstruction.
- Conduct perimeter air monitoring and sampling for community protection during intrusive Site activities.
- Evaluate access routes for passage of heavy equipment and trucks for smokestack debris removal. Obtain approvals for modifications, if necessary.
- Perform work necessary to safely deconstruct the upper 50% of the Building 14 smokestack.
- Prepare and release an RFQ for structural assessment of the lower 50% of the Building 14 smokestack. Assess options to proceed based on findings.
- Prepare and release an RFQ for disposal of smokestack building materials. Sample analysis of the materials for asbestos will be required prior to disposal.
- 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.
- 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, if necessary.
- 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 21 through 22, 2025. A START contractor was present January 22, 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 on-Site. Air monitoring summaries will be issued weekly when on-Site work is being performed. Air sampling analytical data will be released monthly upon completion of data validation.

## **7. Situational Reference Materials**

No information available at this time.