



REGION 2
EDISON, NJ 08837

August 20, 2024

MEMORANDUM

SUBJECT: Request for Approval of a Time-Critical Removal Action, Ceiling Increase and 12-Month Exemption at the Allied Textile Printing Site, Passaic County, Paterson, New Jersey

FROM: Michelle Tabayoyong, On-Scene Coordinator
Removal Action Branch

MARK PANE
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THRU: Joseph D. Rotola, Chief
Removal Action Branch

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TO: Pat Evangelista, Director
Superfund and Emergency Management Division

Site ID: A23F

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action, ceiling increase and 12-Month exemption for the Allied Textile Printing Site ("Site") located in Paterson, Passaic County, New Jersey. The purpose of this RV3 removal action is to abate and dispose of friable asbestos and contaminated ash material contained within the Boiler House complex of the Site. The Boiler House complex consists of the remnants of Buildings 12, 14, 14a, 15 and 16. It also contains two adjacent structures, Open Room 1 and Open Room 2, west of Building 14a. The Boiler House complex also includes a 118-foot-high smokestack which rises out of Building 14. To safely facilitate this removal work, demolition and potential reinforcement of certain site structures may be required. This time-critical removal action will comply with the requirements of the National Historic Preservation Act ("NHPA") to the extent practicable considering the exigencies of the circumstances.

Two previous removal actions (RV1 and RV2) have been taken at the Site. The ceiling authorized for the RV1 removal action was \$15,000, of which \$12,000 was for mitigation contracting. The ceiling authorized for the RV2 removal action was \$1,950,000, of which \$1,475,000 was for mitigation contracting. The ceiling proposed for the RV3 removal action is \$3,990,000, of which \$2,900,000 is for mitigation contracting. If approved, the total project ceiling will be increased to \$5,955,00, of which \$4,387,000 is for mitigation contracting.



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The ATP Site meets the criteria for a removal action under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, ("CERCLA"), 42 U.S.C. § 9601-9675, and Section 300.415(b) of the National Oil and Hazardous Substances Pollution Contingency Plan ("NCP"), 40 C.F.R. § 300.415(b). The Site meets the definition of a facility under Section 101(9) of CERCLA. The Site is not on the National Priorities List ("NPL") nor is it proposed for inclusion.

II. SITE CONDITIONS AND BACKGROUND

The Superfund Enterprise Management System ("SEMS") Identification Number for the ATP Site is NJD002523801.

A. Site Description

1. Removal Site Evaluation ("RSE")

Work conducted between 2013 and 2015:

In May 2013, the EPA Removal Action Branch ("RAB") received an intra-divisional request from the EPA Brownfields Section to assist the City of Paterson, New Jersey, by evaluating the Site for CERCLA removal action consideration.

The Site is a large industrial complex which occupies approximately seven acres of land and at one time contained an estimated 40 buildings. Many of the buildings have been razed since the industrial use of the complex ended in 1983. The buildings remaining are severely deteriorated and have suffered floor/roof collapses as the result of neglect and fire. The structural damage to these remaining buildings makes them unsafe for entry.

Historical information regarding the Site begins in the early 1800's. It was originally designed and constructed for mills and other manufacturing operations that were powered by water from the nearby Passaic River. As technology advanced, steam power was utilized for these operations. Boilers and steam lines were installed throughout the Site and they were clad with asbestos insulating material to increase their efficiency. The decay of the facility has resulted in widespread deterioration of the asbestos insulation and the contamination of the buildings and areas surrounding them. Through Site observations and sampling data, EPA determined that the Boiler House Complex presents the greatest immediate threat to public health and welfare.

EPA and its contractors conducted multiple site visits to perform assessment activities and determine removal eligibility. The first assessment visit was conducted on December 3, 2013. The Site conditions identified during this visit and the subsequent visits are summarized below.

Building 16 contained five above ground storage tanks ("AST"s). At least two of these tanks had been cut open, exposing their interiors. 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 missing and the remaining portions were badly deteriorated. 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. 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 these tanks and affiliated piping and on top of each boiler. 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. Ladders and catwalks servicing the areas above the boilers were dilapidated and appeared unsafe for use. 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 Building 14. SACM was observed on an overhead duct connecting the boiler's exhaust to the smokestack. Ash was also observed in the smokestack cleanout. Dislodged bricks appeared to have been displaced around the top rim of the smokestack. SACM was also observed on the ground adjacent to the exterior Building 14 west wall.

Also, on the west side of Building 14 an open doorway provided access to a room with a collapsed roof, designated by EPA as Open Room 1. Inside an unmarked corroded 55-gallon steel drum was found lying on its side. Pin-holes were observed on one end of the drum.

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

On the east side of the alleyway formed by the south wall of Open Room 2 and the north wall of the remains of a building field designated as the Western Building Tank Room on the exterior northern wall of 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 precariously 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 the north wall surrounded by a half wall also contained SACM in the interstitial space.

Only the north wall, portions of common walls shared with Building 14 and the footprint of Building 12 remain. Portions of the common walls shared with Buildings 14 and 16 and the footprint of Building 15 also remain in place.

A total of 28 bulk SACM samples were collected in and around Buildings 14, 14A, and 16 for asbestos analysis. Both polarized light microscopy (“PLM”) and transmission electron microscopy (“TEM”) techniques were utilized for the analysis. **(See Appendix A, figures and tables depicting the location and concentration of asbestos samples)**. 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% chrysotile, 2% amosite and 2% crocidolite in sample P001-SACM017-01 to 85% chrysotile in P001-SACM019-01 and P001-SACM023-01.

Bulk asbestos was documented laying on the ground outside of Building 14 at several locations. The following table provides the sample number and analysis of bulk asbestos material observed on the ground outside of Building 14.

| Sample Number | Asbestos Analysis |
|----------------------|---|
| P001-SACM026-01 | 80% Chrysotile |
| P001-SACM027-01 | 5% Chrysotile 15% Amosite 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 Toxicity Characteristic Leaching Procedure (“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. This was the only ash sample which had an exceedance (9.36 milligrams per liter (mg/L) for lead) of the TCLP threshold limit of 5 mg/L (40 CFR 261.24). **(See Appendix A for sampling locations, descriptions, and results)**. It is important to note that lead in ash sample P001-ASH002-01 was reported at 4.99 mg/L (boiler 1). This information indicates that lead, a designated hazardous substance under CERCLA, has also released into the environment and may be co-mingled with the asbestos contamination.

Work conducted between 2015 and 2024:

The RV2 Removal Action began on January 26, 2016 and was completed on April 8, 2021. RV1, discussed below, was performed in 2014 to address hazardous substances in abandoned drums at the Site. The scope of work for the RV2 action was to mitigate the asbestos and contaminated ash identified in the RSE. At the start of the RV2 action, EPA conducted a complete structural engineering evaluation of the structures that would potentially be impacted by the planned mitigation. The structural engineering report was finalized on June 17, 2016, and concluded that the smokestack and the buildings surrounding it were in danger of collapse. The report recommended demolition of the buildings and the top one third of the 118-foot-high smokestack to protect Site personnel conducting the mitigation efforts.

After being presented with these findings, the City of Paterson and other parties that EPA consulted as part of its compliance with the NHPA, informed EPA they would not agree to the demolition, or

altering, of any Site structures, due to their historical significance. The City of Paterson informed EPA that it wished to pursue alternative strategies for the mitigation of Site threats that could be carried out without instituting demolition activities. As a result, EPA prepared an alternative RV2 statement of work to allow the City an opportunity to salvage the structures it deemed important and to develop a plan for protecting public health from the asbestos threats posed by the Site. The RV2 action implemented by EPA consisted of installing perimeter fencing and warning signage to deter unauthorized personnel from gaining access to the property. The newly installed fencing, combined with existing fencing and structures, as well as natural barriers, restricted access to the Site. In a letter dated April 10, 2021, EPA notified the City of Paterson of its responsibility to maintain the fencing, signage and structures restricting access to the Site. The RV2 actions taken by EPA to restrict access to the Site were necessary to allow the City of Paterson and the other historic preservation stakeholders time to evaluate alternative strategies to address those parties' concerns regarding the historically significant structures at or near the Site. The removal actions taken by EPA provided interim security measures at the Site to limit further asbestos exposures to unauthorized Site visitors.

In January 2023, EPA learned of the City's construction of the Quarry Lawn and River Walk ("Quarry Lawn Park"). The Quarry Lawn Park was built over the footprints of Buildings 13, 17 to 22 and 24 to 26. Construction of the park required breaching the fencing that EPA had installed to restrict access to the Site. The Quarry Lawn Park is owned by the City of Paterson and operated in partnership with the National Park Service, and is part of the City's re-development plans to create a tourist attraction adjacent to the Great Paterson Falls National Historical Site. The Park boundary would allow the public to come within 81 feet of Building 14 and even closer to the asbestos contamination contained within Open Areas 1 and 2.

The threats from asbestos and contaminated ash that were documented in the RV2 action memorandum continue to be present at the Site. The construction of the Quarry Lawn Park has already brought City contractors close to the contamination remaining at the Site and opening the park to the public would exacerbate those risks by allowing a greater number of people to come into close proximity to the contamination.

2. Physical 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.

The topography of the Site is generally flat near the street, but gradually progresses to a gradient of approximately five percent approaching the Passaic River. Surface water on the Site would tend to generally flow towards the Passaic River, as is evidenced by the design of the raceways along the eastern and southern edges, with the former tail races that gravity-fed the facilities and then discharged into the Passaic River. Based on Federal Emergency Management Agency floodplain data, most of the Site falls within the 100-year flood plain. Past investigations have identified the depth to groundwater to be approximately 14 feet below ground surface. It is reported that groundwater flow is expected to be to the north. Drinking water for the City of Paterson is provided from a reservoir more than four miles from the Site.

Paterson is a mixed use urban community with a high population density. A renovated 4- story building, formerly known as the Congdon Mill, which now provides 67 affordable housing units, borders the north-east portion of the Site. There is also a 4-story apartment building directly across the street from the renovated mill, less than 600 feet from the Site, on Van Houten Street and Magee's Alley. Along the southeastern portion of the Site are two additional renovated mills; the Essex Mill housing complex, which contains 82 units, and the Franklin Mill Office Center, which consists of 29,000 square feet of office space. The closest schools to the Site are Public School No. 2, located 600 feet southeast on Passaic Street with approximately 600 students (K - 8th grade) and Public School No. 5, located 850 feet northwest with approximately 1,000 students (K - 6th grade). The Dr. Andrew McBride Senior residences, a 7-story low-rent public housing building with 96 units operated by the Paterson Housing Authority, is located 350 feet southeast of the ATP Site. The City of Paterson has a population of approximately 150,000 persons.

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.

The Great Falls Historic District spans from, approximately, Ryle Avenue to the north, Oliver and Market Streets to the east, Grand Street and the Stanley M. Levine Reservoir to the south and the river front area west of the Passaic River. A portion of the Great Falls Historic District makes up the legislative boundary of the Paterson Great Falls National Historic Park, which includes the waterfalls, the cliffs north of the waterfalls, the raceways and the Site.

3. Site characteristics

In 1938, Allied Textile Printing, Inc. consolidated its remaining textile businesses at the Site. The company combined numerous machinery manufacturing and silk cloth producing factories into a single plant with various processes. Buildings were connected, open areas and lower levels were filled and new slabs were poured. In 1960, Standard Dyeing and Finishing Company was split from the Allied Textile Printing, Inc. and occupied the large dye houses on the southern portion of the Site, as well as the Gun Mill and quarry lot. Allied Textile Printing, Inc. retained the Todd, Passaic, Waverly and Mallory

Mills. Allied Textile Printing reorganized in 1977 as Allied Textile Processors, Ltd., and operated there until 1983 when the plant closed. The Site was transferred/donated to the National Preservation Institute in December 1982 and soon thereafter transferred to the Paterson Renaissance Organization, a group of private investors, for restoration and redevelopment but it failed to pay property taxes and abandoned the property.

The City owned portions of the Site at several times in the past. The lot where the Todd Mill was situated on was confiscated in 1898 for payment of back taxes and was sold in 1904. A large portion of the Site, including the original mill lots, the quarry and the Todd Mill lot were transferred to the City of Paterson in 1946. The last of these properties were sold off by the City in 1951.

Prior to the RV2 removal action, the Site was fenced along its street frontage. However, access was available at two of the three gates along the street due to damage and along the riverfront where there was no fence. There is ample evidence that the Site was frequented by trespassers who applied graffiti or were otherwise conducting illicit activities throughout most of the remaining structures. Persons were observed walking to and from the property on a frequent basis.

The 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 several times, although trees, brush, undergrowth and extensive poison ivy have again overtaken these areas. During the warmer months, the tree line and vegetation near the street significantly limit any observations of the Site.

Building 14, a brick building with a steel framed roof, was noted to have holes in its walls and a roof that was mostly collapsed. Three large boiler units, at least 15 feet high, are visible from the southeastern exterior side of the building. In 1996 the roof was relatively intact, with some evidence of locations where water was penetrating. A brick smokestack 118 feet in height is adjacent to building 14.

From 1983 through 1997 there were twelve fires at the Site, including a ten alarm fire in June 1983 that destroyed most of the remaining buildings. In 1993 ownership of the Site property was granted to the City of Paterson pursuant to a foreclosure action initiated by the City due to the previous owner's failure to pay property taxes. In July 2002, the City of Paterson declared the Site unsafe due to a homicide that occurred on the property. An Emergency Act was declared which included: removal of the homeless people that were using the buildings; securing of the property; addition of fencing and some lighting; removal of brush, trees, debris and trash; demolition of one non-contributing historic structure and the stabilization of two other structures.

The City of Paterson has owned the Site since June 15, 1993 and remains the current owner of the Site.

An Environmental Justice (EJ) screening of a 3-mile radius from the Site indicates that the area surrounding the site has a medium to high probability for environmental justice concerns. The screening was done using EPA's EJScreen which provides a nationally consistent dataset and approach that summarizes EJ Indexes which incorporate thirteen pollution and ten socioeconomic indicators. Based on the screening, EJ Indexes above the 70th percentile included: particulate matter, diesel particulate matter, air toxics cancer risk, air toxics

respiratory, toxic releases to air, traffic proximity, lead paint, superfund proximity, response management plan (RMP) facility proximity, hazardous waste proximity, underground storage tanks, and wastewater discharge. Additional information on EJScreen can be found at www.epa.gov/ejscreen. The removal action documented in this Action Memorandum will be the third CERCLA removal action undertaken at the Site.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

Actual and threatened releases of hazardous substances at the Site have been documented. The current Site conditions and past investigations indicate there has been a release of CERCLA-designated hazardous substances (as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601) including asbestos and lead at the Site, which is a facility as defined under Section 101(9) of CERCLA. The asbestos containing material (“ACM”) was observed in deteriorating friable conditions and observed 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. This ACM is extremely friable. Data collected during the RSE indicates it contains up to 85% chrysotile, 35% amosite and 20% crocidolite. Bulk asbestos has also been documented on the ground outside the buildings 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 led to its spread to building interior floors, outside surface soils and ambient air. Asbestos fibers can exit the buildings through the many breaches when disturbed by natural wind events or man-made disruption. These mechanisms are further compounded by the deteriorated state of the facility and the continuing deterioration due to weather exposure. The buildings have deteriorated since the company’s operations shut down and from the results of numerous fires resulting in breaches opening up the buildings’ interior to the outside. The roofs of all the subject buildings are either partially collapsed or totally gone. One major wall on the east side of Building 14 has totally collapsed. Portions of other walls in the subject buildings have also collapsed. All the windows and doors of all the buildings are gone. The aforementioned openings provide an avenue for both ACM migration and entry by trespassers. Weather conditions, lack of building maintenance and potentially trespassers will contribute to the continued deterioration of the building walls and roofs. Wind may spread asbestos fibers outside of the building and trespassers may track asbestos outside of the Site on their shoes and clothing.

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, commercial areas and the newly constructed Quarry Lawn and River Walk could possibly be affected. The Site has a long history of fires and at least one homicide was committed at the Site, which is not secured. Although perimeter fencing was installed during the RV2 action, inspections in 2024 have identified several breaches and signs of unauthorized access to the Site, which is frequented by trespassers who placed mattresses and

other day to day necessities in the buildings. Building 14 is within 250 feet of an apartment building and 300 feet of the street.

Three decrepit boilers in Building 14 are deteriorating, exposing the inner portions of the boilers including insulation, heat exchange pipes and ash. The ash of these boilers is falling out of the rusted openings as well as from maintenance and observation ports on different parts of each boiler. This ash was sampled and TCLP lead results evidenced lead at levels exceeding the Resource Conservation and Recovery Act ("RCRA") TCLP threshold value of 5 mg/L.

The mechanisms for past releases to the environment also include discharges onto the ground surface and lack of facility maintenance that has allowed the boilers' outer jackets 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. One individual had made a living quarters inside one of the boilers. The person's movement through and in/out of the boiler caused a further release of the ash 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.

Conditions at the Site meet the requirements of Section 300.415(b) of the NCP for the undertaking of a CERCLA removal action at this time.

Sampling and analysis conducted at the Site by EPA have identified the following CERCLA hazardous substances as defined in 40 CFR Part 302.4.

| <u>Hazardous Substance</u> | <u>Statutory Source for Designation under CERCLA</u> |
|----------------------------|--|
| Asbestos | Clean Water Act Section 307(a) Clean Air Act Section 112 |
| Lead | Clean Water Act Section 307(a) Clean Air Act Section 112 RCRA Section 3001 |

5. NPL status

The Site is not currently under consideration for placement on the NPL.

6. Maps, pictures and other graphic representations

Please refer to the attachments containing figures representing the general location, sampling information and details of the Site and tables of analytical data. Also included are photographs of the Site.

B. Other Actions to Date

1. Previous actions

During a site visit on May 22, 2014, EPA observed abandoned drums inside the infill building, which is situated between the remnants of Buildings 9 and 11-C. The infill building is a collapsing two story structure with a base footprint measuring approximately 70 feet by 13 feet. EPA initially was unable to examine these drums due to the unknown structural stability of the building. A New Jersey licensed structural engineer was hired to evaluate this building. The structural engineer determined that a supporting beam projecting from the damaged northern face of the structure required bracing prior to EPA entering the building to examine the abandoned drums.

On December 15, 2014, EPA activated the Emergency and Rapid Response Services (“ERRS”) contractor to install the required bracing under an assessment task order. After the bracing was installed, EPA was able to safely enter the infill building and observed nine abandoned drums. Initially a 2-ounce sample was collected from each drum for HazCat testing. HazCat test results indicated the presence of corrosive, oxidizing, and combustible materials. These corrosive and oxidizing materials are hazardous substances which posed a potential direct contact threat to persons entering the Site. There was also an observed release of these hazardous substances to the environment as noted by soil staining beneath the drums. As a result, EPA determined that an emergency removal action (RV1) was necessary to mitigate the threat posed to human health and the environment by these drums. Three of the drums were overpacked into three 95-gallon poly overpack drums and the solid materials from two other dilapidated drums were transferred into two new 55-gallon steel drums. The drums were stored in a conex box mobilized to the Site by the ERRS contractor. The Site was demobilized on December 16, 2014. On January 23, 2015, EPA re-mobilized to the Site and shipped the drums to EPA approved treatment/disposal facilities. The RV1 action was completed that day and was effective in mitigating the threats posed by the drums containing hazardous substances. EPA expended approximately \$5,000 in mitigation funds during the RV1 action.

EPA completed the initial Removal Site Evaluation for this Site on April 2, 2015. The RSE documented the asbestos and contaminated ash threats remaining on Site. An RV2 Action Memorandum was approved on September 28, 2015, which authorized a project ceiling of \$1,950,000.

At the start of the RV2 action, EPA conducted a structural engineering evaluation of the buildings that require mitigation as well as other relevant structures. The structural engineering report was finalized on June 17, 2016 and concluded that the smokestack and the buildings surrounding it were in danger of collapse. The report recommended demolition of the buildings and the top one third of the 118-foot-high smokestack.

Because the National Historic Preservation Act (“NHPA”) is an applicable or relevant and appropriate requirement (“ARAR”) for this action, EPA conducted a cultural resource survey of the property. The survey was completed on July 24, 2017. The New Jersey State Historic Preservation Office subsequently (“SHPO”) requested that EPA expand the survey to determine whether the work EPA proposed has the potential to directly, or indirectly impact contributing historic resources at the Site. EPA completed the expanded cultural resource survey on July 11, 2018.

On March 24, 2018, EPA formally requested access to the Site from the City to perform the removal action, including implementing the structural engineering report recommendations for demolition of

the buildings and smokestack so that EPA could safely mitigate the asbestos and contaminated ash threats existing on the Site. On April 25, 2018, the City responded to EPA, via email, and stated they “actively engaged with Federal and State stakeholders in advancing an alternative strategy for the Site, one that will not endanger the historic structures.”

In a letter dated September 30, 2019, EPA confirmed the alternative strategy being pursued by the City of Paterson and requested that interim measures, including security fencing and signage, be installed to limit unauthorized access to the property. After coordinating the interim measures with the National Park Service, the New Jersey SHPO and other stakeholders, EPA began the fence installation process on November 15, 2020. The fencing and signage installation were completed on April 8, 2021, which concluded the RV2 action. EPA expended approximately \$380,000 in mitigation costs for the RV2 action, which provided interim security measures to prevent unauthorized access while the City sought alternative strategies for mitigation which did not involve demolition of historically sensitive structures. The City of Paterson agreed to monitor and maintain the interim security measures and re-engage EPA once their alternative strategy was finalized, which has not occurred as of the date of this Action Memorandum.

2. Current actions

On February 6, 2023, EPA discovered that fencing limiting access to the Site had been removed and that the Quarry Lawn Park was being constructed. The City of Paterson did not notify EPA of the Quarry Lawn Park’s construction.

On February 14, 2023, EPA made the first of several attempts to obtain a response from the City of Paterson to discuss the Quarry Lawn Park’s encroachment past the established Site perimeter. In these messages to the City, EPA emphasized that the potential health threats were exacerbated by allowing workers and the public into closer proximity to the asbestos. On July 14, 2023, the City stated that it was preparing a response to EPA’s concerns, and formally responded on July 31, 2023. In their response they outlined an air sampling plan they proposed undertaking to monitor for asbestos. The City asked EPA to review this plan which proposed using the generated data to “predict their exposure to airborne asbestos threats”.

After reviewing the air sampling plan, EPA responded to the City on November 30, 2023. EPA concluded the planned asbestos monitoring would not alleviate the threats existing at the Site. EPA further noted the sampling plan proposed by the City to monitor for asbestos is inconsistent with the Office of Land and Emergency Management’s (“OLEM”) 2021 Directive No. 9200.0-90 (*Framework for Investigating Asbestos-Contaminated Comprehensive Environmental Response, Compensation and Liability Act Sites*) referenced in the City’s sampling plan and provided no protection to the public. EPA further concluded the City had not developed an alternative strategy for addressing the threats posed by the Site, as it had previously indicated would be done. The perimeter Site fencing had been compromised to permit construction of the Quarry Lawn Park, which would invite the public to within 81 feet of Building 14. No efforts had been made to mitigate the asbestos threats remaining on the Site, or to prevent a catastrophic release of asbestos should any of the structures collapse. On January 29, 2024, EPA consulted with New Jersey Department of Environmental Protection (“NJDEP”) which concurred with EPA’s plans for asbestos mitigation and demolition of Site structures, as well as agreeing that the Park should not open until the mitigation efforts are complete.

Considering the exigencies of the threats posed by asbestos and other hazardous substances at the Site, which are exacerbated by the construction of the Quarry Lawn Park, EPA has determined that it is not possible to adequately protect the public without demolishing the Boiler House Complex and a portion of the smokestack. The threat to the public now outweighs the need to take additional steps to comply with the NHPA's substantive requirements. This Action Memorandum requests funding to implement the necessary steps to mitigate the asbestos and contaminated ash threats posed by this Site.

C. State and Local Authorities Roles

1. State and local actions

In 2001, the City of Paterson declared an emergency due to a homicide at the Site and took actions to stabilize the Site. The City of Paterson Fire Department has responded to the Site on numerous occasions in the past due to fires. On April 25, 2018, the City informed EPA, via email, that they did not want EPA to mitigate the asbestos threats at the Site if it involved demolition of any Site structures. The City decided to engage with other Federal and State historic preservation stakeholders in advancing an alternative asbestos mitigation strategy that would not endanger the historic structures. To date, the City has not developed or proposed any alternative cleanup strategy.

2. Potential for continued State/local response

On January 29, 2024, EPA briefed NJDEP on the Quarry Lawn Park construction and its exacerbation of the asbestos threats posed by the Site. NJDEP fully supported EPA's plans for mitigation, including the required demolition of any structures. EPA has been in contact with the City of Paterson and the National Park Services on multiple occasions both informally and formally. Informal meetings regarding this RV3 action began in February, 2024 and have continued until the present time. Formal meetings to discuss the removal action activities occurred on February 15, 2024, March 25, 2024 and April 15, 2024. The City of Paterson has offered to continue assisting EPA by coordinating with the NJ State Historic Preservation Officer.

III. THREATS TO PUBLIC HEALTH WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Hazardous substances, pollutants or contaminants present at the Site represent a threat to the public health and the environment as defined by Section 300.415(b)(2) of the NCP in that there has been a release of ACM and lead to the environment.

The deteriorating buildings and debris on the Site, specifically those which comprise the Boiler House Complex, are contaminated with asbestos. Friable asbestos has been released into the environment as indicated by the documented presence of bulk asbestos laying on the soil and on pipes located outside of Building 14. The threat of continued and more significant release exists due to weather conditions, building deterioration, asbestos migration, trespassing, and the unsecured nature of the Site.

Asbestos is a general term used to describe minerals that tend to form fibers when they are broken. These minerals are formed under conditions of very high heat and pressure deep within the earth and they are naturally resistant to temperature and pressure variances incurred during use as thermal insulation. Since their chemical composition is unchangeable, an asbestos mineral will generally break into fibers. Large fibers break into smaller ones, which eventually results in its reduction to microscopic sized fibers. Friability is the ease with which asbestos can be crumbled, pulverized or reduced to powder when dry, by hand pressure. Friable asbestos is designated as a CERCLA hazardous substance under 40 CFR Table 302.4. The degree of friability of the ACM determines the potential for fiber release to the air. Once released, asbestos fibers have the ability to remain entrained in the air for extended periods of time. These microscopic fibers, because of their size, shape and lightness, physically act more like a gas than a dust.

Chrysotile is a mineral containing long, flexible fibers that, due to their electron structure, tend to have elevated adhesion properties. This makes them highly likely to become re-entrained in dust. Amosite is a mineral whose fibers are finely divided and brittle and are also easily re-entrained in dust.

Strong evidence suggests that inhalation exposure to asbestos fibers increases the risk of respiratory cancer, mesothelioma and possibly gastrointestinal cancer. The Agency for Toxic Substances and Disease Registry considers asbestos to be a known cancer-causing substance with a latency period of ten to 40 years between exposure and the onset of the disease. The chance that asbestos will lead to lung cancer depends on the cumulative dose of asbestos fibers, as well as the underlying risk of lung cancer due to other factors. While lung cancer and mesothelioma are generally associated with long-term exposure to asbestos, some evidence suggests that short-term exposure is also a concern and cannot be disregarded. Asbestos inhalation can also lead to asbestosis, an accumulation of scar like tissue in the lungs and surrounding tissue (pleura) causing decreased blood flow to the lungs. This condition progresses slowly over many decades, and may continue even after the asbestos exposure has ceased. As microscopic scarring builds up, the lungs become stiff and restricted with thickening in the walls of the breathing spaces leading to breathing difficulty. Asbestosis is typically associated with exposure to high concentrations of asbestos fibers in occupational health settings. According to the National Institute for Occupational Health and Safety ("NIOSH"), evaluation of all available human data provides no evidence for a safe threshold for asbestos exposure.

The heavy metal found at the highest concentrations in the ash is lead. Preschool children who come in contact with elevated levels of lead in soil might be exposed to small amounts of lead by accidentally swallowing soil and dust that clings to their hands. Lead exposure may cause serious adverse health effects, particularly in young children. Young children and fetuses are especially sensitive to the toxic effects of lead exposure. Long-term exposure can increase blood lead levels in children and may cause a decrease in IQ, a decrease in hearing and changes in enzyme function in the blood. Lead is a cumulative poison where increasing amounts can build up in the body eventually reaching a point

where symptoms and disability occur. Symptoms include decreased physical fitness, fatigue, sleep disturbance, aching bones, abdominal pains and decreased appetite. Lead is a powerful systemic poison. Ingestion and inhalation of large amounts can lead to seizures, coma, and death. Long-term exposure can result in severe damage to the brain, blood-forming organs, and the nervous, urinary and reproductive systems.

The relationship between soil lead concentrations and the consequent impact on blood lead levels in children has been studied through numerous epidemiological studies. Based on these epidemiological studies, it is generally believed that persistent exposure to soil-borne lead results in an increase in blood lead levels (in children) of 1-9 ug/dl per 1,000 ppm lead in soil. This relationship may become less robust as exposure durations decrease and soil lead levels increase.

As a result of the release and potential for continued release of asbestos fibers and lead to the environment, the conditions at the Boiler house Complex at the Site meet the criteria for a CERCLA removal action as described in the NCP, 40 CFR 300.415(b)(2). Factors from the NCP Section 300.415(b)(2) that support conducting a removal action at the ATP Site include:

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;

Large quantities of friable asbestos have been found inside and outside of Building 14 and the other parts of the Boiler House Complex. Much of the ACM is damaged and degrading due to age and exposure to the elements. The building has deteriorated since its operations shut down resulting in breaches opening up the building interior to the outside. The primary mechanism for the release of asbestos to the environment is from the effects of weathering on the extensive interior piping and equipment insulation wraps. The deterioration of the ACM has resulted in the spread of asbestos to building interior floors, outside surface soils and ambient air. Asbestos fibers can exit the buildings through the many breaches when disturbed by natural wind events or man-made disruption. Trespassers accessing the building have walked in contaminated areas and may have tracked ACM from inside to the outside of the building. Damaged and deteriorating friable asbestos containing insulation was confirmed on the ground outside the buildings, in debris inside the buildings and on piping and other equipment outside and inside the buildings. Since the buildings are not secured and have numerous exit routes friable asbestos will continue to emanate from the buildings and be released to the environment. The most significant human exposure pathway for asbestos is the inhalation of respirable asbestos fibers. The ingestion of fibers is also an exposure pathway of concern for individuals who come into direct contact with ACM on the Site. Individuals that come in contact with asbestos on the Site can transport asbestos off-site on their clothing and/or shoes and expose other individuals. Once released, asbestos fibers can remain in suspension for long periods and can be transported long distances. Visitors to the newly constructed Quarry Lawn Park could easily be impacted by the asbestos threats from the Site. People in nearby residential communities and commercial areas could also potentially be affected. Building 14 is within 250 feet of an apartment building and 300 feet of the street. The closest schools to the Site are Public School No. 2, located 600 feet southeast on Passaic Street with approximately 600 students (K - 8th grade) and Public School No. 5, located 850 feet northwest with approximately 1,000 students (K - 6th grade).

Significant human exposure pathways for boiler ash containing high levels of lead contamination include inhalation, dermal contact and ingestion. Trespassers or workers involved in property redevelopment would be exposed to high levels of lead in Building 14. Anyone entering the building would disturb the heavy floor dust and become exposed to suspended particulates containing significant concentrations of lead. The open dilapidated condition of the building will permit the contaminated dust to migrate outside over a wide area of the Site and beyond especially during high wind conditions. Dust outside the main building in Site soils could be re-suspended and transported off-site during normal wind conditions. This situation could result in exposing residents of neighboring communities to elevated concentrations of lead.

The fencing installed along Van Houten and Mill Streets by the City of Paterson and subsequently by EPA as part of the RV2 action has been breached. Although the City of Paterson has taken certain actions in the past to secure the property, its size and location adjacent to the Passaic River and attractiveness for trespassers and other persons potentially conducting illicit activities limit the effectiveness of these security measures. The buildings themselves are in such poor condition that securing them would not be possible to prevent persons who are determined to enter.

Persons have been seen entering and leaving the Site on a fairly frequent basis and have entered within the ruins of several of the buildings, including the boiler where an individual was observed to be living. Piles of clothing, suitcases and other refuse that have been brought onto the Site are evident both inside and outside of the structures. There are several locations at the Site associated with partially collapsed buildings where there is evidence of people living within the interiors. Small fires, possibly in drums, are used to generate heat in the winter. Building exteriors, interiors and standing walls show evidence of extensive graffiti. Persons trespassing into the building could have been directly exposed to ACM and lead. One person admitted to EPA to living inside of a boiler in Building 14 and of making an open fire inside the boiler for warmth. In addition to his direct exposure to hazardous substances, his actions would have increased the migration of the hazardous substances to the environment, with his fire having an especially increased risk of mobilizing the ACM contamination.

(v) Weather conditions exist that may cause hazardous substances, or pollutants, or contaminants to migrate or be released;

The Boiler House Complex structures at the Site have not been maintained since operations at the facility ceased and have suffered significant damage due to fires, scavenging and vandalism. They are susceptible to ongoing damage from changing weather conditions and flood damage. Heavy snow during the winter can increase collapses.

Weather conditions exist that may cause hazardous substances to migrate or be released. Continued exposure of ACM pipe wrappings to the elements will increase their rate of deterioration leading to additional releases of asbestos fibers. Wind can carry the asbestos fibers outside the buildings. Asbestos can become airborne during dry conditions and migrate to off-site areas. Once in the environment, the stable mineral fibers persist and do not further break down. Wind traveling through the open buildings will cause asbestos fibers to be entrained in the air resulting in the spread of asbestos fibers to the environment.

Heavy precipitation events will transport asbestos and lead on the building floors through the missing walls and other openings in the buildings to the Passaic River and other down gradient areas. ACM outside the buildings on pipes and on the ground has also been documented.

On April 5, 2024, an earthquake centered in western New Jersey impacted the Site. Some bricks on the top course of the smokestack appear to have been shaken loose and fell to the ground. It is unclear the full extent of the damage caused by the earthquake. Should the buildings or smokestack collapse as a result of the damage they sustained from the earthquake, a large scale release of asbestos would be anticipated.

(vi) Threat of fire or explosion

The Site has a history of fires associated with vandalism. From 1983 through 1997 there were twelve fires at the Site, including a ten alarm fire in June 1983 that destroyed most of the then-remaining buildings. A fire in the remaining structures on the Site containing significant amounts of asbestos could result in the generation and release of a large airborne plume of smoke containing asbestos fibers. This plume could easily migrate off-site into neighboring communities causing widespread exposure to high levels of airborne asbestos. Water used to fight a fire would also facilitate migration of the contaminants from the Site. The last documented fire occurred at the Site on August 27, 2015.

(vii) The availability of other appropriate federal or State response mechanisms to respond to the release.

There are no other appropriate federal or state response mechanisms available to respond to the situation.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

Completion of the planned removal action will exceed the 12-month statutory limitation for removal actions. The threat to human health or the environment posed by the contamination found at the Site warrants a 12-month exemption based on the following factors:

A. Emergency Exemption

1. There is an immediate risk to public health or welfare or the environment.

Response actions beyond twelve months will be required for EPA to complete the necessary removal actions to mitigate the threats posed by the Site. Conditions at the Site and the proposed actions meet the criteria for an emergency exemption as specified in CERCLA Section 104(c). There are immediate risks to public health and the environment, and continued response actions are immediately required

to prevent, limit or mitigate the release or threat of release of hazardous substances at the Site. The asbestos contamination identified at this Site will continue to pose an immediate threat to individuals entering the Site and to those living near the Site. Weather conditions including wind and precipitation will continue to mobilize asbestos and lead, contributing to the immediate threats, and there is a continued risk of fire. Neither the state nor local governments can provide assistance on a timely basis.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

The asbestos waste existing on Site has been documented through sampling conducted during the RSE. Bulk asbestos was documented laying on the ground outside of Building 14 at several locations. Asbestos analysis of samples has indicated concentrations as high as 80% chrysotile, 20% crocidolite and 15% amosite. The asbestos is in extremely poor condition and will continue to weather, causing more releases of asbestos to the environment. The most recent fire at the Site occurred in August 2015. These factors combine to pose an immediate risk to public health, welfare and the environment. 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 Hose complex after 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 these risks.

3. Assistance will not otherwise be provided on a timely basis.

Other federal, state, or local response mechanisms and resources are not available to respond to the release and/or threat of release of hazardous substances from the Site. Both the State and local government lack the necessary resources to perform a response at the Site.

VI. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed action description

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 and lead from deteriorated insulation and the boiler ash at the Boiler House Complex portion of the Site. At the conclusion of the planned removal action, no post-removal Site control measures are anticipated. In order to mitigate the threats at this Site, the following actions will be required:

- Re-evaluate the structures included in the structural engineering report dated June 17, 2016, and determine if any significant changes have occurred which require a change in the approach to the work.
- Undertake recordation of the historical structures being addressed, as appropriate and practicable, given the condition of those structures and the exigencies of the situation.
- Implement the recommendations of the structural engineering reports to demolish the smokestack and the Boiler House Complex. Where practical and when safe to do so, attempt to

salvage portions of the structures. Conduct an engineering evaluation of the Colt Gun Bridge and implement the recommendations which are the most practical and as necessary to support field activity for the removal action.

- Stabilize the Colt Gun Building and other Site structures, as necessary and if practicable, to prevent their damage during field activity.
- Remove, package, and dispose of friable ACM found in and around the Boiler House Complex.
- Remove and containerize the contaminated ash in and around the three boilers in Building 14 and the Building 14 smokestack and all appurtenances of the structures.
- Refurbish Site egress roads, especially those through Quarry Lawn Park, as necessary.
- All hazardous substances identified and recovered during the course of the removal action will be shipped to an EPA approved off-site disposal facility.
- Off-site disposal of hazardous waste and/or substances will comply with the Off-Site Rule, 40 CFR 300.440.

2. Contribution to remedial performance

The removal action to be undertaken at the Site is consistent with the requirement of Section 104(a)(2) of CERCLA, which states, “any removal action undertaken... should... to the extent practicable, contribute to the efficient performance of any long-term remedial action with respect to the release or the threatened release concerned.” The planned removal action would be consistent with any future remedial action. Currently there are no long-term remedial actions planned for the Site.

3. Engineering evaluation/cost analysis (“EE/CA”)

Due to the time critical nature of this removal action, an EE/CA was not prepared.

4. Applicable and relevant and appropriate requirements

ARARs within the scope of this project included the Clean Air Act (“CAA”) National Emissions Standards for Hazardous Air Pollutants (“NESHAP”), the Resource Conservation and Recovery Act (“RCRA”), the Hazardous Materials Transportation and Safety Act and NHPA. The Hazardous Materials Transportation and Safety Act, RCRA, and NESHAP will be met to the extent practicable.

NHPA is of specific concern for this action, as the City of Paterson and the associated stakeholders highly value the historical significance of the Site structures, especially as they advance plans to re-develop this area into a public park. Remnants of former structures have been partially re-furbished for this purpose and are on display in the new Quarry Lawn Park. The removal action will comply with substantive requirements of NHPA to the extent practicable considering the exigencies of the situation.

5. Project schedule

Field activities can be initiated within three weeks following the approval of this Action Memorandum. The project is expected to take approximately eighteen months to complete. This schedule is only an estimate and will be heavily influenced by a number of factors, including the cooperation of the stakeholders, with the planned EPA activity. Any challenges related to compliance with the NHPA

could result in significant delays and increased project costs. Technical factors, such as availability of approved disposal facilities and key subcontractors needed to perform portions of the work will also influence the proposed schedule.

EXTRAMURAL COSTS:

| Direct Extramural Costs: | Original Site Ceilings Approved for RV1 | Original Site Ceilings Approved for RV2 | Funding Increase Requested in this Action Memo for RV3 | Proposed New Site Ceilings |
|--|---|---|--|----------------------------|
| Total Cleanup Contractor Cost (Includes 20% Contingency) | \$12,000 | \$1,475,000 | \$2,900,000 | \$4,387,000 |
| Removal Support Team, Extramural Costs | \$3,000 | \$150,000 | \$425,000 | \$578,000 |
| Subtotal, Extramural Costs | \$15,000 | \$1,625,000 | \$3,325,000 | \$4,965,000 |
| Extramural Cost Contingency | \$0 | \$325,000 | \$665,000 | \$990,000 |
| Total, Removal Action Project Ceiling | \$15,000 | \$1,950,000 | \$3,990,000 | \$5,955,000 |

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE

DELAYED OR NOT TAKEN

If the actions described in this Action Memorandum are delayed or not taken, the threats posed by the Boiler House Complex at the Site will persist. The direct contact and off-site migration threat posed by friable asbestos and lead containing ash present represent a significant threat to human health. If no actions are taken, trespassers will continue to come into direct contact with hazardous substances and weather events will increase the active release and off-site migration of asbestos and the lead contamination. Trespassers may also cause more damage to the buildings or start a fire, which will result in additional releases of hazardous substances. It is expected that the conditions of the remaining buildings will further deteriorate over time, which will increase the additional exposures to people in and around the Site to hazardous substances. The construction of the Quarry Lawn Park adjacent to the western boundary of the Site has increased the risk of asbestos exposure to workers and the public visiting the park.

VIII. OUTSTANDING POLICY ISSUES

There are no known outstanding policy issues associated with the Site at the present time.

IX. ENFORCEMENT

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 ATP 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.

Based on full cost accounting practices, the total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$9,051,427. The following chart describes the costs which EPA believes are eligible for cost recovery as part of this response action.

| Cost Type | Funding Requested in this Action Memorandum |
|---|--|
| Direct Extramural Costs | \$5,955,000 |
| Direct Intramural Costs | \$ 400,000 |
| Subtotal, Direct Costs | \$6,355,000 |
| Indirect Costs (Indirect Regional Cost Rate 42.43%) | \$2,696,427 |
| Estimated EPA Costs Eligible for Cost Recovery | \$9,051,427 |

Note: Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

X. RECOMMENDATION

This decision document represents the selected removal activities for the Boiler House Complex on the Allied Textile Printing Site in Paterson, New Jersey developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal action. The ceiling authorized for the RV1 removal action was \$15,000, of which \$12,000 was for mitigation contracting. The ceiling authorized for the RV2 removal action was \$1,950,000, of which \$1,475,000 was for

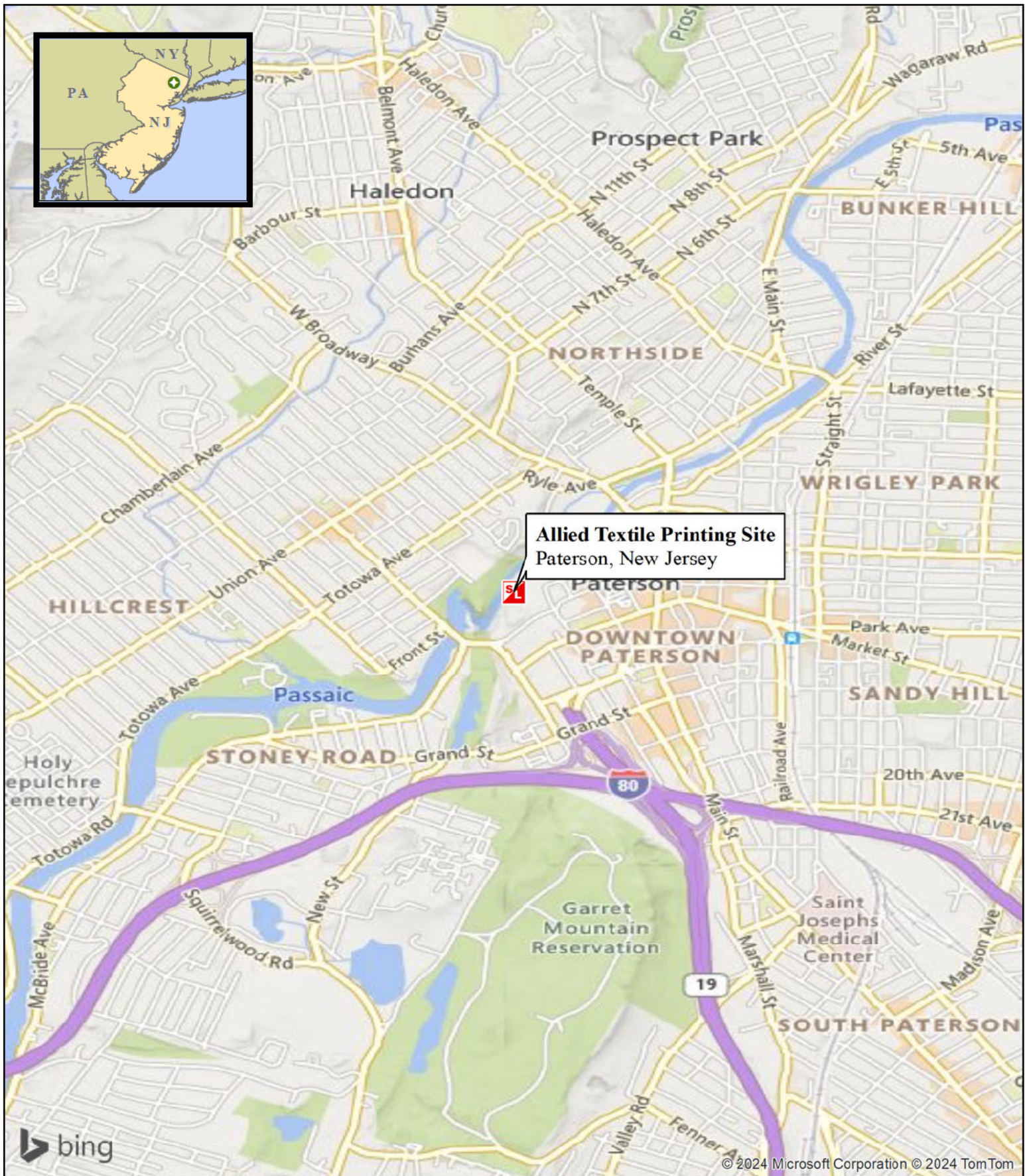
mitigation contracting. The ceiling proposed for the RV3 removal action is \$3,990,000, of which \$2,900,000 is for mitigation contracting. If approved, the total project ceiling will be increased to \$5,955,00, of which \$4,387,000 is for mitigation contracting. There are sufficient monies in the Regional Removal Advice of Allowance to fund the project.

Please indicate your formal approval of this Action Memorandum, Ceiling Increase and request for a 12-Month exemption for the Allied Textile Printing Site RV3, as per current Delegation of Authority, by signing below.

Approved: Evangelista, Pat Digitally signed by Evangelista, Pat
Date: 2024.08.20 10:31:12 -04'00' **Date:** August 20, 2024
Pat Evangelista, Director
Superfund and Emergency Management Division

Disapproved: _____ **Date:** _____
Pat Evangelista, Director
Superfund and Emergency Management Division

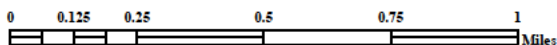
cc: (upon approval)
P. Evangelista, SEMD-D
J. Prince, SEMD-DD
E. Wilson, SEMD-DD
J. Rotola, SEMD-RAB
B. Schlieger, OEM
Chun Kai Lo, OIG
A. Raddant, USDOJ



Legend



Site Location



Weston Solutions, Inc.
Federal East Division

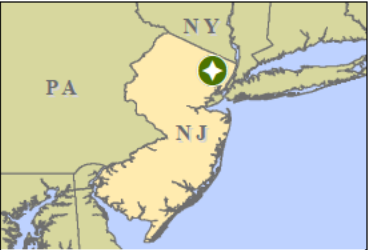
In Association With
Eco-Risk; Avatar Environmental, LLC;
Pro-West & Associates, Inc.; On-Site Environmental, Inc.;
Sovereign Consulting, Inc.; and TechLaw Consultants, Inc.

Figure 1:
Site Location Map

Allied Textile Printing
Paterson, New Jersey

U.S. ENVIRONMENTAL PROTECTION AGENCY
SUPERFUND TECHNICAL ASSESSMENT
& RESPONSE TEAM V
CONTRACT # 68EE0319D0004

GIS ANALYST: T. BUDROE
EPA OSC: [REDACTED]
START V SPM: [REDACTED]
CHARGE #: 40200051.930.5109



SCALE

1:850

LEGEND

- Park
- Site Boundary
- Drum Area (RV1)
- Building Footprint*
- Current Investigation Area
- Tail Raceway**
- Fenceline



Note(s):
» * Approximate location of buildings based on historic maps.
» ** The Tail Raceway was observed to be dry.

Figure 2:
Site Map

ALLIED TEXTILE PRINTING
PATERSON, NEW JERSEY

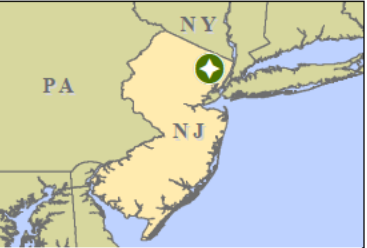
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
SUPERFUND TECHNICAL ASSESSMENT
& RESPONSE TEAM V
CONTRACT # 68HE0319D0004

Weston Solutions, Inc.

In Association With
Eco-Risk; Avatar Environmental, LLC;
Pro-West & Associates, Inc.; On-Site Environmental, Inc.;
Sovereign Consulting, Inc.; and TechLaw Consultants, Inc.

| | |
|----------------|-----------------------|
| GIS ANALYST: | T. BUDROE |
| EPA OSC: | |
| START V.S.P.M: | |
| FILENAME: | 240510 Allied_SiteMap |
| FIGURE: | 2 |
| REVISION: | 0 |
| DATE MODIFIED: | 5/10/2024 |





SCALE
1:1,000

- LEGEND**
- Park
 - Site Boundary
 - Building Footprint*



*Approximate location of buildings based on historic maps

Figure 3: Park Construction

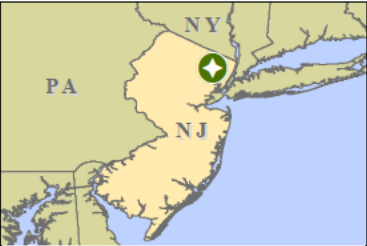
ALLIED TEXTILE PRINTING
PATERSON, NEW JERSEY

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
SUPERFUND TECHNICAL ASSESSMENT
& RESPONSE TEAM V
CONTRACT # 68HE0319D0004
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Pro-West & Associates, Inc.; On-Site Environmental, Inc.;
Sovereign Consulting, Inc.; and TechLaw Consultants, Inc.

| | |
|----------------|-----------------------------|
| GIS ANALYST: | T. BUDROE |
| EPA OSC: | |
| START V.S.P.M. | |
| FILENAME: | 240509_ATP_ParkConstruction |
| FIGURE: | 3 |
| REVISION: | 0 |
| DATE MODIFIED: | 3/9/2024 |





SCALE
1 Inch: 70 Feet

- LEGEND**
- Building Acting as Site Barrier
 - Building/Fence Acting as Site Barrier
 - Natural Cliff Acting as Site Barrier
 - River/Cliff/Wall Acting as Site Barrier
 - Building Footprint*
 - Tail Raceway**
 - Existing Fence
 - Fence Repairs Required
 - New fence
 - Gate
 - New Gate
 - Gate Repairs Required



Note(s):
» * Approximate location of buildings based on historic maps.
» ** The Tail Raceway was observed to be dry.

Figure 4:
Site Fence and Barrier Map

ALLIED TEXTILE PRINTING
PATERSON, NEW JERSEY

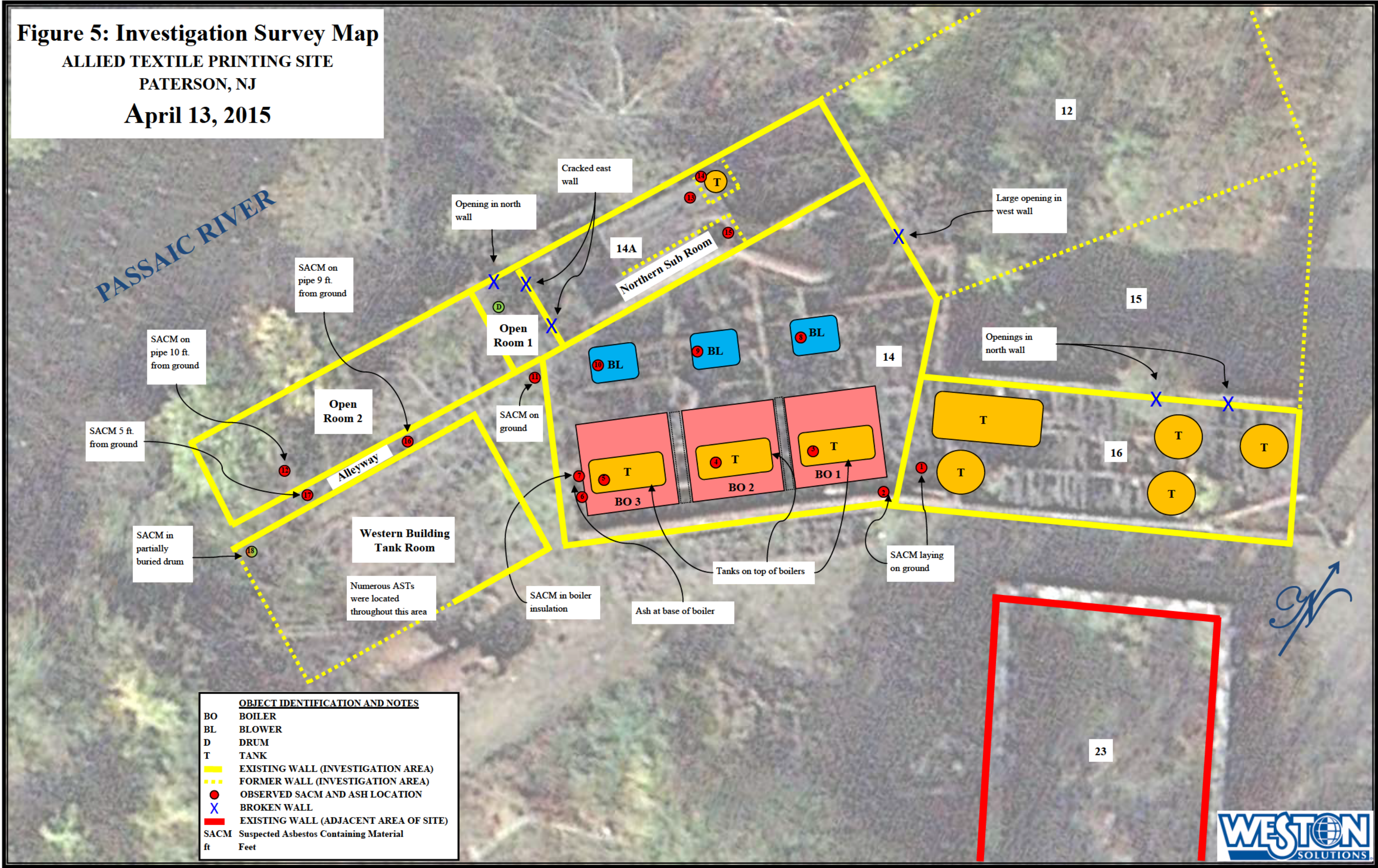
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
SUPERFUND TECHNICAL ASSESSMENT
& RESPONSE TEAM V
CONTRACT # 68HE0319D0004
Weston Solutions, Inc.

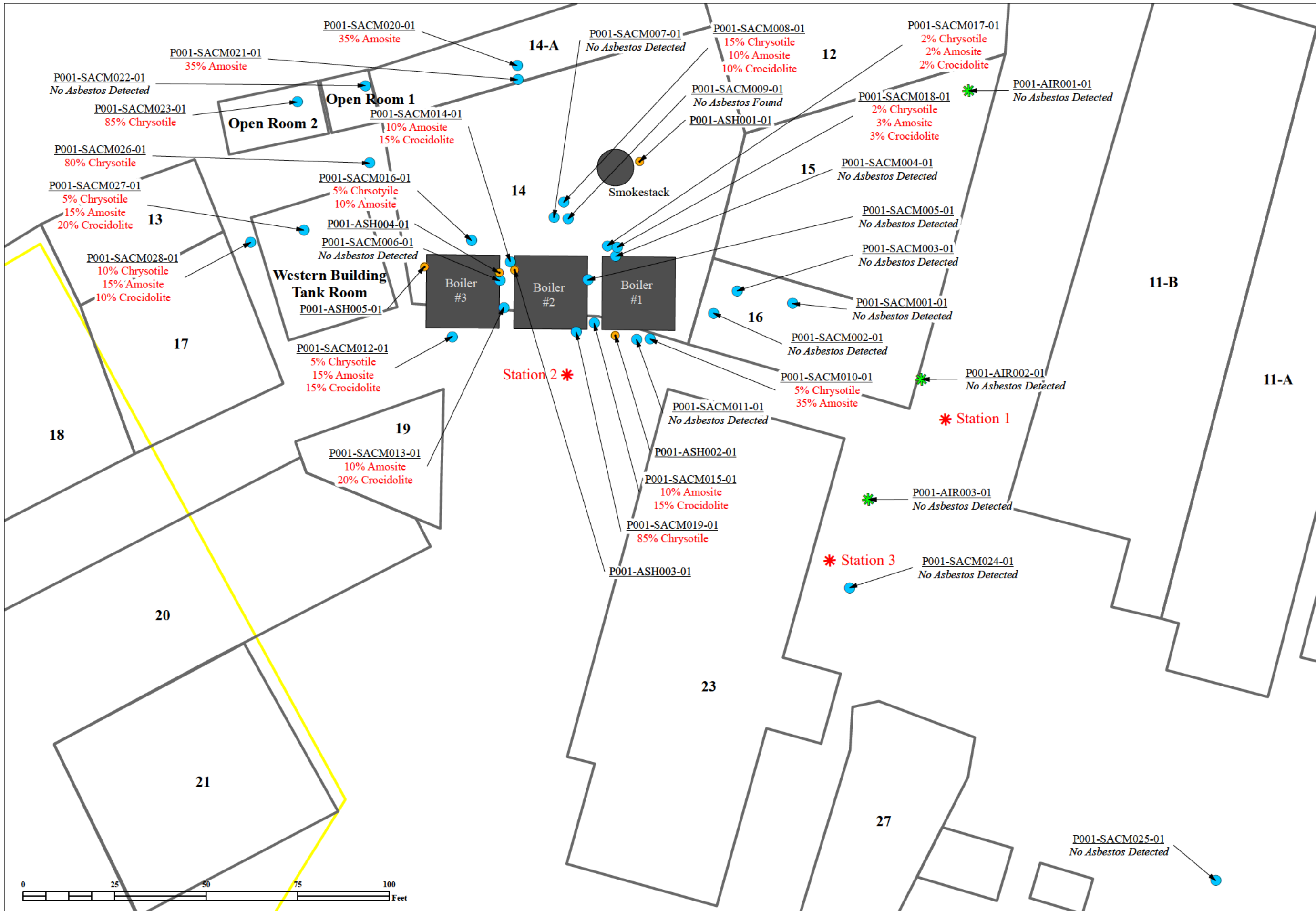
In Association With
Eco-Risk; Avatar Environmental, LLC;
Pro-West & Associates, Inc.; On-Site Environmental, Inc.;
Sovereign Consulting, Inc.; and TechLaw Consultants, Inc.


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|----------------|-----------------------------------|
| GIS ANALYST: | T. BUDROE |
| EPA OSC: | |
| START V.SPM: | |
| FILENAME: | 240510 Allied_SiteFenceBarrierMap |
| FIGURE: | 4 |
| REVISION: | 0 |
| DATE MODIFIED: | 5/10/2024 |



Figure 5: Investigation Survey Map
ALLIED TEXTILE PRINTING SITE
PATERSON, NJ
April 13, 2015







SCALE
1:300

LEGEND

- * Air Monitoring Station
- * Air Sample
- * Ash Sample
- * Asbestos Sample
- Building Feature
- Building Outline
- Park

Note(s):
» * Approximate location of buildings based on historic maps.
» Bold numbers within the Building Outline indicate building reference numbers.

Figure 6: All Sample Locations and Asbestos Results

**ALLIED TEXTILE PRINTING
PATERSON, NEW JERSEY**

**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY**

**SUPERFUND TECHNICAL ASSESSMENT
& RESPONSE TEAM V
CONTRACT # 68HE0319D0004**

Weston Solutions, Inc.

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Sovereign Consulting, Inc.; and TechLaw Consultants, Inc.

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|----------------|---------------------------------|
| GIS ANALYST: | T. BUDROE |
| EPA OSC: | |
| START V SPM: | 240510_SampleResults_April 2015 |
| FILENAME: | 6 |
| FIGURE: | 0 |
| REVISION: | 3/10/2024 |
| DATE MODIFIED: | |




Table 1: Sample Collection Information
Allied Textile Printing Site
Paterson, Passaic County, New Jersey
April 27 and 28, 2015

| RST 3 Sample No. | Lab ID | Sample Location | Matrix | Sample Date | Sample Time | Sample Type | Analysis |
|------------------|----------|---------------------------------|------------------|-------------|-------------|-----------------------------------|-------------|
| P001-SACM001-01 | 879770 | Building 16 | Insulation | 4/27/2015 | 11:40 | Field Sample | Asbestos |
| P001-SACM002-01 | 819743 | Building 16 | Insulation | 4/27/2015 | 11:45 | Field Sample | Asbestos |
| P001-SACM003-01 | 819744 | Building 16 | Insulation | 4/27/2015 | 11:47 | Field Sample | Asbestos |
| P001-SACM004-01 | 819745 | Building 14 | Insulation | 4/27/2015 | 11:53 | Field Sample | Asbestos |
| P001-SACM005-01 | 819746 | Building 14 | Insulation | 4/27/2015 | 11:57 | Field Sample | Asbestos |
| P001-SACM006-01 | 819747 | Building 14 | Insulation | 4/27/2015 | 12:02 | Field Sample | Asbestos |
| P001-SACM007-01 | 819748 | Building 14 | Pipe Wrap | 4/27/2015 | 12:07 | Field Sample | Asbestos |
| P001-SACM008-01 | 819749 | Building 14 | Insulation | 4/27/2015 | 12:12 | Field Sample | Asbestos |
| P001-SACM009-01 | 819750 | Building 14 | Pipe Wrap | 4/27/2015 | 12:16 | Field Sample | Asbestos |
| P001-SACM010-01 | 819751 | Building 14 | Pipe Wrap | 4/27/2015 | 12:20 | Field Sample | Asbestos |
| P001-SACM011-01 | 819752 | Building 14 | Roofing Material | 4/27/2015 | 12:23 | Field Sample | Asbestos |
| P001-SACM0012-01 | 819753 | Building 14 | Insulation | 4/27/2015 | 12:27 | Field Sample | Asbestos |
| P001-SACM013-01 | 819754 | Building 14 | Insulation | 4/27/2015 | 12:31 | Field Sample | Asbestos |
| P001-SACM014-01 | 819755 | Building 14 | Pipe Wrap | 4/27/2015 | 12:35 | Field Sample | Asbestos |
| P001-SACM015-01 | 819756 | Building 14 | Insulation | 4/27/2015 | 12:42 | Field Sample | Asbestos |
| P001-SACM016-01 | 819757 | Building 14 | Insulation | 4/27/2015 | 12:46 | Field Sample | Asbestos |
| P001-SACM017-01 | 819758 | Building 14 | Insulation | 4/27/2015 | 14:12 | Field Sample | Asbestos |
| P001-SACM018-01 | 819759 | Building 14 | Insulation | 4/27/2015 | 14:15 | Field Sample | Asbestos |
| P001-SACM019-01 | 819760 | Building 14 | Seal | 4/27/2015 | 14:37 | Field Sample | Asbestos |
| P001-SACM020-01 | 819761 | Building 14A | Insulation | 4/27/2015 | 15:07 | Field Sample | Asbestos |
| P001-SACM021-01 | 819762 | Building 14A | Pipe Wrap | 4/27/2015 | 15:12 | Field Sample | Asbestos |
| P001-SACM022-01 | 819763 | Building 14A | Mortar | 4/27/2015 | 15:13 | Field Sample | Asbestos |
| P001-SACM023-01 | 819764 | Ground | Fiber Board | 4/27/2015 | 15:16 | Field Sample | Asbestos |
| P001-SACM0024-01 | 819765 | Ground | Fibrous Material | 4/27/2015 | 15:32 | Field Sample | Asbestos |
| P001-SACM0025-01 | 819766 | Ground | Fibrous Material | 4/27/2015 | 15:36 | Field Sample | Asbestos |
| P001-SACM0026-01 | 819767 | Ground | Fiber Board | 4/28/2015 | 9:35 | Field Sample | Asbestos |
| P001-SACM0027-01 | 819768 | Ground | Pipe Wrap | 4/28/2015 | 9:40 | Field Sample | Asbestos |
| P001-SACM0028-01 | 819769 | Ground | Pipe Wrap | 4/28/2015 | 9:43 | Field Sample | Asbestos |
| P001-AIR001-01 | 819714 | North on Tree | MCE Cassette | 4/28/2015 | 10:45 | Field Sample | Asbestos |
| P001-AIR002-01 | 819715 | Center on Fence | MCE Cassette | 4/28/2015 | 10:47 | Field Sample | Asbestos |
| P001-AIR003-01 | 819716 | South on Tripod | MCE Cassette | 4/28/2015 | 10:49 | Field Sample | Asbestos |
| P001-ASH001-01 | G2053-08 | Smokestack Cleanout | Ash | 4/27/2015 | 14:23 | Field Sample | TCLP Metals |
| P001-ASH002-01 | G2053-01 | Boiler #1 , Southwest Port | Ash | 4/27/2015 | 14:34 | Field Sample | TCLP Metals |
| P001-ASH002-02 | G2053-04 | Boiler #1 , Southwest Port | Ash | 4/27/2015 | 14:34 | Field Duplicate of P001-ASH002-01 | TCLP Metals |
| P001-ASH003-01 | G2053-05 | Boiler #2, around Heating Pipes | Ash | 4/27/2015 | 14:45 | Field Sample | TCLP Metals |
| P001-ASH004-01 | G2053-01 | Boiler #3, Northeast Corner | Ash | 4/27/2015 | 14:51 | Field Sample | TCLP Metals |
| P001-ASH005-01 | G2053-07 | Boiler #3, Northwest Corner | Ash | 4/27/2015 | 14:57 | Field Sample | TCLP Metals |

Notes:

MCE - Mixed Cellulose Ester

TCLP - Toxicity Characteristic Leachate Procedure

Table 2: Sample Collection Information and Validated Analytical Results - Asbestos

Allied Textile Printing Site
Paterson, Passaic County, New Jersey
April 27 and 28, 2015

| RST 3 Sample ID | Sample Date | Sample Time | Sample Result | Type | Building | Location | Comments |
|---------------------|-------------|-------------|--|------------------|----------|-------------------------------------|---|
| Bulk Samples | | | | | | | |
| P001-SACM001-01 | 4/27/2015 | 11:40 | No Asbestos Found | Insulation | 16 | Inside tank adjacent to boilers | Material collected from inside debris filled cut opened tank. |
| P001-SACM002-01 | 4/27/2015 | 11:45 | No Asbestos Found | Insulation | 16 | Ground adjacent to tank | Material located on ground by the tank -Fiberglass appearance. |
| P001-SACM003-01 | 4/27/2015 | 11:47 | No Asbestos Found | Insulation | 16 | Tank by boilers | Material collected from top of tank. |
| P001-SACM004-01 | 4/27/2015 | 11:53 | No Asbestos Found | Insulation | 14 | Boiler # 1 | Material collected from north side of Boiler # 1. Fibrous grey material. |
| P001-SACM005-01 | 4/27/2015 | 11:57 | No Asbestos Found | Insulation | 14 | Boiler # 2 | Material collected from east side of Boiler # 2, on side facing Boiler # 1. Grey insulation material. |
| P001-SACM006-01 | 4/27/2015 | 12:02 | No Asbestos Found | Insulation | 14 | Boiler # 3 | Material collected from east side of Boiler # 3, side facing Boiler # 2. Grey insulation material. |
| P001-SACM007-01 | 4/27/2015 | 12:07 | No Asbestos Found | Pipe Wrap | 14 | Behind Boiler # 2 | Pipe wrap collected from hanging pipe wrap, north of Boiler # 2. Fiberglass appearance. |
| P001-SACM008-01 | 4/27/2015 | 12:12 | 15% Chrysotile, 10% Amosite, 10% Crocidolite | Insulation | 14 | Pipe | Material collected from top of pipe. Probably fallen from above. Adjacent to P001-SACM07-01 and P001-SACM09-01. |
| P001-SACM009-01 | 4/27/2015 | 12:16 | No Asbestos Found | Pipe Wrap | 14 | Pipe | Pipe wrap. Material similar to P001-SACM07-01. |
| P001-SACM010-01 | 4/27/2015 | 12:20 | 5% Chrysotile, 35% Amosite | Pipe Wrap | 14 | South side of Boiler # 1 | 12" diameter pipe; pipe wrap sample. Fibrous white/grey material. |
| P001-SACM011-01 | 4/27/2015 | 12:23 | No Asbestos Found | Roofing Material | 14 | South side of Boiler # 1 | Collapsed roofing material, adjacent to sample P001-SACM010-01. |
| P001-SACM012-01 | 4/27/2015 | 12:27 | 5% Chrysotile, 15% Amosite, 15% Crocidolite | Insulation | 14 | South of Boiler # 3 | Material collected from the ground, south of Boiler # 3. |
| P001-SACM013-01 | 4/27/2015 | 12:31 | 10% Amosite, 20% Crocidolite | Insulation | 14 | Ground, between Boilers # 2 and # 3 | Material appears to have fallen from catwalk above. |
| P001-SACM014-01 | 4/27/2015 | 12:35 | 10% Amosite, 15% Crocidolite | Pipe Wrap | 14 | Ground Material/Wrap | Northwest corner of Boiler # 2. Appears to have fallen from pipe above. Fibrous, white. |
| P001-SACM015-01 | 4/27/2015 | 12:42 | 10% Amosite, 15% Crocidolite | Insulation | 14 | Ground Material | Ground material between Boiler # 1 and Boiler # 3, south corner. |
| P001-SACM016-01 | 4/27/2015 | 12:46 | 5% Chrysotile, 15% Amosite | Insulation | 14 | Top of Blower | Material collected from top of blower, north of Boiler # 3. Fallen from above. |
| P001-SACM017-01 | 4/27/2015 | 14:12 | 2% Chrysotile, 2% Amosite, 2% Crocidolite | Insulation | 14 | Northwest corner of Boiler # 1 | Material collected from fallen debris. |
| P001-SACM018-01 | 4/27/2015 | 14:15 | 2% Chrysotile, 3% Amosite, 3% Crocidolite | Insulation | 14 | Boiler # 1 | Sample collected from on top of electrical box, fallen from above. Corner of Boiler # 1. |
| P001-SACM019-01 | 4/27/2015 | 14:37 | 85% Chrysotile | Seal | 14 | Boiler # 2 | Sample collected from southeast port seal around hatch. |
| P001-SACM020-01 | 4/27/2015 | 15:07 | 35% Amosite | Insulation | 14A | Building 14A, debris pile | Sample collected from pile of debris on floor. Grey fibrous material. |
| P001-SACM021-01 | 4/27/2015 | 15:12 | 35% Amosite | Pipe Wrap | 14A | Building 14A | Pipe wrap material lying on ground. Grey fibrous material. |
| P001-SACM022-01 | 4/27/2015 | 15:13 | No Asbestos Found | Mortar | 14A | Drum Room | Sample from northeast corner of drum room, mortar material. |
| P001-SACM023-01 | 4/27/2015 | 15:16 | 85% Chrysotile | Fiber Board | NA | Open Room | Thin rigid plastic like material with fibrous composition. |
| P001-SACM024-01 | 4/27/2015 | 15:32 | No Asbestos Found | Fibrous Material | NA | Near Building 23 | Material collected from ground, near decontamination area. White fibrous material. |
| P001-SACM025-01 | 4/27/2015 | 15:36 | No Asbestos Found | Fibrous Material | NA | Near Decon Station | Material collected from ground, near decontamination area. White fibrous material. |
| P001-SACM026-01 | 4/28/2015 | 9:35 | 80% Chrysotile | Fiber-Board | NA | Northwest corner of Building 14 | Material collected from northwest corner of Building 14, material on the ground. |
| P001-SACM027-01 | 4/28/2015 | 9:40 | 5% Chrysotile, 15% Amosite, 20% Crocidolite | Pipe Wrap | NA | Tank Area | Material located in corner, fallen white material. Fibrous appearance. |
| P001-SACM028-01 | 4/28/2015 | 9:43 | 10% Chrysotile, 15% Amosite, 10% Crocidolite | Pipe Wrap | NA | Corridor adjacent to tank area. | Material collected from top of pipe. White fibrous material. |
| Air Samples | | | | | | | |
| P001-AIR001-01 | 4/28/2015 | 10:45 | <0.006 f/cc | MCE Cassette | NA | North on Tree | None |
| P001-AIR002-01 | 4/28/2015 | 10:47 | <0.006 f/cc | MCE Cassette | NA | Center on Fence | None |
| P001-AIR003-01 | 4/28/2015 | 10:49 | <0.006 f/cc | MCE Cassette | NA | South on Tripod | None |
| FB-0150428 | 4/28/2015 | 11:01 | <7.0 f/mm ² | MCE Cassette | NA | NA | Field Blank |
| LB-150428 | 4/28/2015 | 11:00 | <7.0 f/mm ² | MCE Cassette | NA | NA | Lot Blank |

Notes:

% - Percent

f/cc - Fibers per Cubic Centimeter

f/mm² - Fibers per Square Millimeter

NA - Not Applicable

MCE - Mixed Cellulose Ester

Table 3: Ash Samples Validated Analytical Results - TCLP Metals
Allied Textile Printing Site
Paterson, Passaic County, New Jersey
April 27, 2015

| RST 3 Sample ID | TCLP Maximum Contaminant Concentrations (mg/L) | P001-ASH001-01 | P001-ASH002-01 | P001-ASH002-02 | P001-ASH003-01 | P001-ASH004-01 | P001-ASH005-01 |
|-------------------|---|-----------------|-----------------|-----------------|-----------------|----------------|-----------------|
| Lab Sample Number | | G2053-08 | G2053-01 | G2053-04 | G2053-05 | G2053-06 | G2053-07 |
| Sampling Date | | 4/27/2015 | 4/27/2015 | 4/27/2015 | 4/27/2015 | 4/27/2015 | 4/27/2015 |
| Matrix | | Ash | Ash | Ash | Ash | Ash | Ash |
| Arsenic | 5.0 | 0.025 U | 0.025 U | 0.025 U | 0.025 U | 0.025 U | 0.025 U |
| Barium | 100.0 | 0.265 J | 0.09 J | 0.0737 J | 0.17 J | 0.104 J | 0.0942 J |
| Cadmium | 1.0 | 0.0128 J | 0.479 | 0.528 | 0.0095 J | 0.0384 | 0.0599 |
| Chromium | 5.0 | 0.192 | 0.0226 J | 0.0559 | 0.125 | 0.029 J | 0.0125 U |
| Lead | 5.0 | 1.22 | 4.99 | 4.45 | 9.36 | 2.09 | 0.585 |
| Mercury | 0.2 | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U |
| Selenium | 1.0 | 0.0998 J | 0.102 | 0.0863 J | 0.05 U | 0.104 | 0.105 |
| Silver | 5.0 | 0.0125 U | 0.0125 U | 0.0125 U | 0.0125 U | 0.0125 U | 0.0125 U |

Notes:

TCLP - Toxicity Characteristic Leaching Procedure

All results reported in milligrams per liter (mg/L).

Detected concentrations are **Bolded**.

U - The compound was not detected at the indicated concentration.

J - Data indicates the presence of a compound that meets the identification criteria. The result is less than the quantitation limit but greater than MDL.

Results at or exceeding TCLP Maximum Contaminant Concentrations highlighted yellow.

Attachment B
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Photograph 1: A 2015 view of a room south of Building No. 14A, looking west with the Passaic River in the background.



Photograph 2: A 2024 view of a room south of Building No. 14A, looking west with the Passaic River in the background.

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Photograph 3: View of the Allied Textile Printing Site from the entry bridge at the Site access gate.



Photograph 4: A view of the reconnaissance area within the Site which included Building Nos. 12, 14, 14A, 15 and 16.

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Photograph 5: A view of the south wall of Building No. 16, indicated by the red arrow.



Photograph 6: A view of the interior of Building No. 16. The building roof had collapsed with debris covering the floor. There were five abandoned ASTs located inside the building.

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Photograph 7: SACM was observed on the floor of the west wall between two tanks inside Building No. 16.

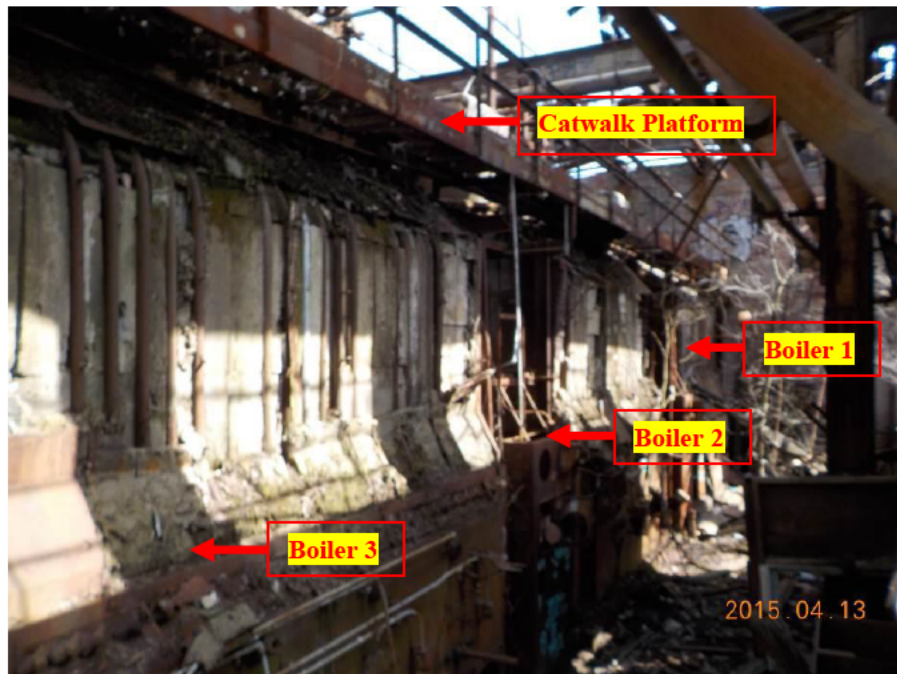


Photograph 8: The north wall of Building No. 16 was broken at two locations.

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Photograph 9: A view of the south wall of Building No. 14. The building roof had collapsed, the windows are all broken and some of the walls have holes.



Photograph 10: A view of the interior of Building No. 14. The catwalk which provides access to the boilers via ladders appeared unsafe with rusty spots observed along sections of the platform.

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Photograph 11: Ash material was observed at the base of each boiler inside Building No. 14.



Photograph 12: SACM was identified on one overhead pipe, opposite Boiler 1 inside Building No. 14.

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Photograph 13: A sheet of SACM was observed at the point of entry into the 1st Open Room which is located by the west wall of Building No. 14.



Photograph 14: A drum containing residual quantity of material was observed in the 1st Open Room (indicated by the red arrow). The drum was rusty with signs of deterioration in the form of pin-hole leaks on the top and bottom. The east wall was cracked at two locations exposing SACM within the wall (yellow circle).

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Photograph 15: The north wall of the 1st Open Room was broken and it exposed a view of the Passaic River.



Photograph 16: A view of the 2nd Open Room. Debris observed throughout the floor. SACM was observed on piping approximately 10 feet from the ground along the south wall of the building. There were no pre-existing roofing structures in this room.

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Photograph 17: Abandoned ASTs observed at the Western Building Tank Room.



Photograph 18: SACM was identified on piping (indicated by the red arrows) approximately 5 feet from the ground on the east side of the access corridor to the Western Building Tank Room.

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Photograph 19: SACM was identified on piping (indicated by the red arrows) approximately 9 feet from the ground on the west side of the access corridor to the Western Building Tank Room.



Photograph 20: A partially buried drum containing SACM was observed at the northwest corner of the Western Building Tank Room (indicated by the red arrow).

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Photograph 21: SACM was observed on overhead piping (indicated by the red arrows) along the south wall inside a Sub Room located within Building No. 14A.



Photograph 22: A view of Building No. 14A showing broken walls, damaged roof, and debris throughout the floor.

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Photograph 23: Inside Building No. 14A, SACM was observed on the floor near a walled tank and within the walled space around the tank.



Photograph 24: The southwest wall of Building No. 12 was broken and it exposed the northeast portion of Building No. 14.

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Photograph 25: SACM was observed on the floor around the three blowers that were associated with each of the boilers inside Building No. 14. The SACM observed on the floor was suspected to be slough from overhead piping associated with the blowers.



Photograph 26: View of intricate ducts associated with the boilers, blowers and the exhaust stack within Building No. 14. The yellow circle shows the extent of damage to one of the several ladders used to access the catwalk platform.

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Photograph 27: The red arrow shows the base of the exhaust stack in Building No. 14. The blower and ducts indicated by the yellow circle are associated with the exhaust stack.



Photograph 28: Dislodged bricks, indicated by the red arrow, were observed to be hanging around the rim of the exhaust stack which was located inside Building No. 14.

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Photograph 29: EPA identified an entry gate located at the southeast area of the Site as a possible point of entry for a manlift.



Photograph 30: EPA investigated the structural integrity of the bridge into the property to determine if it was structurally capable of carrying the weight of a manlift.