

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #5
Progress
Allied Textile Printing RV3
A23F
Paterson, NJ
Latitude: 40.9171816 Longitude: -74.1790350

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From: Colleen Grell, OSC

Date: 3/26/2025

Reporting Period: 1/27/2025-3/14/2025

1. Introduction

1.1 Background

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

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 27, 2025.

Bid documents for the partial deconstruction of the Building 14 smokestack were submitted to the EPA Region 2 Contracting Officer on January 24, 2025; a contract has yet to be awarded as of the date of this PolRep.

Air sampling was conducted January 6-9, 2025 and January 22, 2025 when activities which involved movement of potentially contaminated Site materials were occurring. Air samples were collected at locations around the work area 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. No asbestos fibers were detected in the samples. Real-time air monitoring was also conducted during these events. Air monitoring and air sampling data reports were posted on the Site webpage (refer to Section 6.1).

EPA is pursuing documentation of site structures within the work zone in accordance with the Historic American Engineering Record (HAER). EPA received the Schedule of Documentation from NPS on February 12, 2025, which included structures in the entirety of the Site. As only a limited number of those structures will be affected by the current removal, EPA requested that only the potentially impacted structures be included. The revised Schedule of Documentation was received on February 20, 2025 and includes the Boiler House Complex (Buildings 12, 14, 14A, 15, 16 and adjacent outbuildings), Building 19, and the Colt Gun Building (Building 23). Building 19, which currently exists as only a foundation, is not anticipated to be impacted as part of the current plan; however, it is included in the Schedule of Documentation due to its location within the work zone.

An archeological subcontractor was retained to provide services to accomplish requirements of the HAER documentation, including large-format photography, aerial images, and a detailed written report. On March 13-14, 2025, the EPA OSC, a START contractor, and a subcontractor mobilized to the Site to conduct large-format photography. On March 13, 2025, an uncrewed aircraft system (UAS), also known as a "drone", pilot employed by the subcontractor mobilized to the Site to collect aerial images of the target buildings named in the Schedule of Documentation. The flight was lower than 400 feet above ground level and in Class G airspace, not requiring a waiver, to collect data at properties where EPA has obtained legal access to conduct site-related activities. The pilot was licensed and met the requirements of 14 CFR §107.65 to operate UAS at the Site. Notification was provided to the City of Paterson and stakeholders prior to UAS activity at the Site. Perimeter air monitoring and sampling was not conducted during these activities, as there was no movement of potentially contaminated Site materials.

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	2.89 Tons	13958263	Stabilization	Landfill

Trash & Vegetation	Solids	1.99 Tons	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.
- To the extent practicable given the exigencies of the situation, necessary activities will be conducted in accordance 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

- Submit large-format photos and aerial images to NPS for acceptance and continue process for HAER documentation. Once complete, the HAER report and associated images will be available through the Library of Congress.
- Hold a stakeholder meeting prior to the start of smokestack deconstruction activities.
- 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. The lower portion of the smokestack will be evaluated after deconstruction of the upper 50%. Assess options to proceed based on findings.
- Continue to work with NJDOL, NPS, City of Paterson, and stakeholders.
- 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, a START contractor, and two subcontractors were present March 13-14, 2025. A representative of the City of Paterson was present on March 13, 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

6.2 Reporting Schedule

Provide POLREPs weekly when EPA contractors are performing work on-Site. Air monitoring and sampling will occur when intrusive on-Site activities are occurring; air monitoring summaries will be issued weekly when there is data to report and air sampling analytical data will be released monthly upon completion of data validation.

7. Situational Reference Materials

No information available at this time.