

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #8  
Progress - Smokestack Deconstruction Begins  
Allied Textile Printing RV3  
A23F  
Paterson, NJ  
Latitude: 40.9171816 Longitude: -74.1790350

**To:** Michael Martucci, USEPA R02  
Alyssa Arcaya, USEPA R02  
Pat Evangelista, USEPA R02 SEMD  
John Prince, USEPA R02 SEMD  
Eric Wilson, USEPA R02 SEMD  
Joe Rotola, USEPA R02-SEMD-RAB  
Dan Gaughan, USEPA R02-SEMD-RAB-RAES  
Dan Harkay, SEMD-RAB-RAS  
Colleen Grell, SEMD-RAB-RAS  
Mark Pane, SEMD-RAB-RSS  
Michelle Tabayoyong, SEMD-RAB-RSS  
James Haklar, USEPA R02-SEMD  
Douglas Fischer, USEPA R02-ORC  
Juan Fajardo, USEPA R02-ORC  
Sabina Byck, USEPA R02-EJCEERD-CEEJB  
Shereen Kandil, USEPA R02-EJCEERD-CEEJB-CIES  
Joel Waddell, USEPA R02-EJCEERD-CEEJB-CIES  
Nikolaus Wirth, USEPA R02-EJCEERD-SPCBFB-ERSPS  
Anna Drabek, USEPA R02-PAO  
Elias Rodriguez, USEPA R02-PAO-MRB  
Stephen McBay, USEPA R02-PAO-MRB  
Chun Kai Lo, USEPA R02-OIG-OI-FID-EB-NFS  
Brian Schlieger, USEPA OLEM-OEM-PROD-PREPB  
Andrew Raddant, US DOI  
Gwen Zervas, NJDEP  
Radovan Djurin, NJDOL  
Darren Boch, US NPS  
Keith Winslow, US NPS  
Catherine Turton, US NPS  
Jed Porter, US NPS  
Andre Sayegh, City of Paterson Mayor  
Gianfranco Archimede, City of Paterson  
Tim Benton, START

**From:** Colleen Grell, OSC

**Date:** 6/24/2025

**Reporting Period:** 6/14/2025-6/20/2025

## 1. Introduction

### 1.1 Background

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

#### 1.1.1 Incident Category

Asbestos and lead release in an abandoned industrial facility.

#### 1.1.2 Site Description

See previous POLREPs.

##### 1.1.2.1 Location

See previous POLREPs.

##### 1.1.2.2 Description of Threat

See previous POLREPs.

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

See previous POLREPs.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The purpose of this removal action is to eliminate the threat of direct contact, active release into the environment, and off-site migration of friable asbestos-containing material (ACM) from deteriorated insulation and lead from the boiler ash at the Site. Removal operations will focus on buildings 14, 14A, and 16. Partial or full deconstruction of the building 14 smokestack is required for safety reasons. Fencing has been installed around the Colt Gun Building for safety reasons and also to minimize potential 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 June 13, 2025.

From June 16-19, 2025, the EPA On-Scene Coordinator (OSC), a START contractor, an ERRS contractor, and a team of subcontractor personnel performed Site operations.

On June 16, 2025, brick and debris from demolition of the "arch" wall of building 14 and the adjacent unstable section of wall from building 16 was moved into the staging area. The manlift was used to trim high tree branches. The individual sections of the chute were assembled.

On June 17, 2025, the manlift bucket was raised to begin brick removal and encountered delays when sensors on the manlift arm prevented the bucket from being moved into the correct position due to the proximity of the manlift arm to building 14. Sensors were adjusted by the crew to allow necessary maneuvering while still maintaining a safe distance from the building. The OSC and the EPA Public Affairs Officer (PAO) met with two reporters, the mayor of Paterson, and personnel from the City of Paterson as the first brick was removed from the smokestack. Additional brick and mortar were removed throughout the day, and samples were collected and submitted to a laboratory for analysis of asbestos and lead.

On June 18, 2025, brick and mortar continued to be removed from the smokestack and PolRep #7 was posted to the Site website.

The Weekly Air Monitoring Summary was posted on June 19, 2025. A thunderstorm in the afternoon caused Site operations to cease. A second impending thunderstorm in late afternoon caused Site operations to end for the day and the crew departed by 16:30. From June 17 through 19, 2025, a total of 16 courses of brick were removed from the smokestack. A subcontracted third-party monitor performed work zone air monitoring for particulates and collected air samples to be submitted to a laboratory for asbestos analysis; work zone air monitoring data and air sample results will not be posted publicly, as the data was collected only within the work zone.

START conducted perimeter air monitoring during all on-Site operations, June 16 through 19, 2025. Air monitoring and sampling were conducted at strategic locations around the perimeter of the site for protection of the public and to verify the effectiveness of engineering controls. Real-time air monitoring was performed to screen for particulates with a diameter of 10 microns or less (PM10). No exceedances of air monitoring action levels due to possible dust generated from on-site removal activities were detected during the intrusive activity. Air samples were also collected at each of these locations and submitted to a laboratory for total fiber and asbestos fiber analysis via Phase Contrast Microscopy (PCM) and Transmission Electron Microscopy (TEM), respectively. As of the time of release of this PolRep, validated analytical data was not yet received. The air monitoring summaries and air sampling reports can be found on the website (see Section 6.1 of this PolRep) under the "Documents" tab.

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

See previous POLREPs.

#### 2.1.4 Progress Metrics

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

Given the exigencies of the situation, such as the impending opening of Quarry Lawn Park located less than 100 feet from the Boiler House Complex, persons frequenting the facility, and vagrants clearly inhabiting the Site on a long-term basis, EPA will conduct the asbestos mitigation in the most expedient manner. EPA intends to proceed with asbestos mitigation as quickly as possible. The time and funding necessary for completion of all tasks is considerable, and EPA has revised the scope of work for this removal action. The revised list of actions required to mitigate the threats at this Site is as follows:

- Structurally secure or demolish the building 14 smokestack and walls comprising the Boiler House Complex as necessary to resolve safety hazards.
- Remove, package, and dispose of friable ACM from building 14, building 14A, building 16, 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

- Perform work necessary to safely deconstruct the upper 50% of the building 14 smokestack.
- Collect samples of smokestack brick and mortar during deconstruction and submit to a laboratory for asbestos and lead analysis to determine if the material is contaminated.
- Coordinate structural evaluation of the lower portion of the smokestack once the upper portion is deconstructed to determine whether the lower 50% of the smokestack may be left in place.
- Continue process for Historic American Engineering Record (HAER) documentation. Once complete, the HAER report and associated images will be available through the Library of Congress.
- Hold the next stakeholder meeting to update stakeholders on smokestack deconstruction activities.
- Conduct perimeter air monitoring and air sampling for community protection during intrusive Site activities.
- Continue to work with the Advisory Council on Historic Preservation (ACHP), National Park Service (NPS), New Jersey Department of Labor (NJDOL), New Jersey Department of Environmental Protection (NJDEP), New Jersey Historic Preservation Office (NJHPO), City of Paterson, and stakeholders.
- Evaluate options to secure underground storage tanks during Site operations, if necessary.
- Continue to conduct public outreach activities.
- Post pollution reports, air monitoring reports, air sampling reports, and community updates regularly on the Site website.

## 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

City of Paterson Historic Preservation Commission

National Park Service

New Jersey Department of Labor

New Jersey Department of Environmental Protection

New Jersey Historic Preservation Office

Advisory Council on Historic Preservation

## 4. Personnel On Site

The EPA OSC, one START contractor, one ERRS contractor, and nine subcontractor personnel were present at the Site June 16-19, 2025. The third-party monitor subcontractor was present June 16-19, 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 and Rapid Response Services  
OSC – On Scene Coordinator  
NPS – National Park Service  
NJDOLE – New Jersey Department of Labor  
NJDEP – New Jersey Department of Environmental Protection  
NJHPO – New Jersey Historic Preservation Office  
RFP – Request for Proposal  
CIC – Community Involvement Coordinator  
POLREP – Pollution Report  
PCM – Phase Contrast Microscopy  
TEM – Transmission Electron Microscopy  
NHPA – National Historic Preservation Act  
HAER – Historic American Engineering Record  
CIC – Community Involvement Coordinator  
ACHP – Advisory Council for Historic Preservation

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

ATP Website for Current Information:

[https://response.epa.gov/site/site\\_profile.aspx?site\\_id=16653](https://response.epa.gov/site/site_profile.aspx?site_id=16653)

Administrative Record for RV3:

<https://semspub.epa.gov/src/collection/02/AR67925>

Administrative Record for RV1 and RV2:

<https://semspub.epa.gov/src/collection/02/AR63892>

### **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.