

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #10
Progress
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-PREP
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: 7/8/2025

Reporting Period: 6/28/2025-7/4/2025

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 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 air 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 28, 2025.

From June 30, 2025 through July 3, 2025, the EPA On-Scene Coordinator (OSC), a START contractor, an ERRS contractor, and a team of subcontractor personnel performed Site operations. Brick and mortar were removed from the smokestack on all days that the crew was on Site.

On June 30, 2025, samples of the red brick, mortar, and light-colored brick that makes up the logo on the smokestack were collected for analysis of asbestos and lead. A sample of the mortar from between the stone from a wall of building 16 was also collected.

On July 1, 2025, PolRep #9 and the Weekly Air Monitoring Summary were posted to the Site website.

On July 2, 2025, the OSC and an EPA representative met with the mayor of the City of Paterson and three other City representatives in the parking lot of Paterson Great Falls National Park to show progress and give an update. After the meeting, the OSC met with three EPA representatives at the Site to give an overview of Site conditions and progress. The subcontractor performing smokestack deconstruction calculated that a total of approximately 40 feet of the smokestack had been removed to date and the measurements indicated that the total height of the smokestack had been greater than the initial estimate of 118 feet at the beginning of the deconstruction. In accordance with the original estimate, the top 60 feet of the smokestack will be deconstructed, and a structural engineer will evaluate the lower portion.

On July 3, 2025, brick and mortar removal continued. The crew ended the day early due to an impending thunderstorm.

From June 30, 2025 through July 3, 2025, approximately 27 courses of brick were removed from the smokestack. A total of 70 courses of brick have been removed since beginning brick removal on June 17, 2025, which is approximately 34% of the smokestack. Brick and mortar from the smokestack and all other debris are being staged on Site. 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 30, 2025 through July 3, 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. Preliminary air sampling data has been received by EPA. As of the time of release of this PolRep, validated analytical data was not yet received. Data that has not been validated will not be posted publicly. 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>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
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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. The structural engineer is anticipated to perform the evaluation on Friday, July 11, 2025.
- 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, subcontractor personnel performing the smokestack deconstruction, and the third-party monitor subcontractor were present at the Site from June 30, 2025 through July 3, 2025. Three EPA representatives were on Site on July 2, 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

NJDOL – 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

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.