



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 24 2015

ACTION MEMORANDUM – RV1

SUBJECT: Action Memorandum to Confirm a Verbal Authorization and Funding for an Emergency Removal Action at the Old Saratoga Hospital Site, Providence, Saratoga County, New York

FROM: Paul L. Kahn, On-Scene Coordinator
Response and Prevention Branch

TO: Walter E. Mugdan, Director
Emergency and Remedial Response Division

THRU: Eric Mosher, Chief
Response and Prevention Branch

Site ID #A25L

I. PURPOSE

The purpose of this Action Memorandum is to document the verbal authorization and funding to initiate an emergency removal action pursuant to the Comprehensive Environmental Response, Compensation and Liability Act described herein at the Old Saratoga Hospital Site located in Providence Township, Saratoga County, New York.

On July 14, 2015 the Deputy Director of the Emergency and Remedial Response Division granted verbal authorization to activate the Emergency and Remedial Response Services contractor to respond to the Site to stabilize approximately 30 drums of abandoned waste water treatment chemicals and approximately 50 5-gallon pails of roofing tar and paint found at the Site. The total extramural funding that has been verbally authorized was \$159,000 of which \$147,000 is for mitigation contracting.

II. SITE INFORMATION

A. Site Description

Site Name	Old Saratoga Hospital
Superfund Site ID ("SSID")	A25L
NY State Case Number	881709
CERCLIS ID Number	NYN000201779
Site Location	7239- 7267 Barkersville Rd. Providence Township, Saratoga County, NY
Lat/Long	
NPL Status	Not listed
Removal Start Date	July 27, 2015

B. Site Background

1. Removal site evaluation

On May 20, 2015, the Director of Technical Support with the New York Department of Environmental Conservation sent a referral to the Director of the EPA Region II Emergency & Remedial Response Division for the subject site, an abandoned former tuberculosis cure hospital. In the referral letter the NYSDEC indicated that the former hospital has experienced a number of releases, including a fire that occurred at the Site in September 2014 and involved pails of paint and roofing tar. The responding fire department officials stated that they discovered containers of paint and other flammable materials, as well as extensive amounts of friable asbestos pipe insulation. Photographs of the Site provided by the NYSDEC revealed what appeared to be thousands of linear feet of asbestos pipe insulation, much of which had fallen to the floor or was hanging in tatters from the pipes. The photos also showed piles of five-gallon pails, many of which bore red flammable liquid warning labels. Subsequently, OSCs viewed amateur video movies taken inside the Site and posted on the Internet. The movies showed individuals conducting room-by-room 'tours' of the Site with running narratives. The movies clearly show piles of pipe insulation deteriorated or collapsed floors and walls, and accessible window/door openings. One room was shown to contain mattresses, clothing, and children's toys indicating squatters had entered the premises. Based on this information and further investigation by OSCs, it was determined that a recon of the Site was warranted. A signed access agreement was received from the current property owner on June 8, 2015, and on June 29, 2015 OSCs visited the Site with a representative of the NYSDEC and the Providence Town Supervisor. During the recon visit the OSCs observed the presence of the pails of flammable liquids and roofing tar. Entering a small out building they discovered the former waste water treatment facility. Inside were approximately 30 55-gallon drums of what appeared to be treatment chemicals, some of which had bulging tops or were overturned. There were at least two 30-gallon carboys marked "Sulfuric Acid." This WWTP has been used by the hospital to pretreat its wastes prior to discharge into a stream 50 feet away that empties into Sacandaga Lake. A subsequent phone call to the current owner confirmed that these drums had been seen inside the structure as far back as 1982 when the owner had attempted to rehab the hospital.

The Providence Township supervisor has informed the OSCs that if there is another fire inside the main building the volunteer fire department will not enter because of the presence of bulk chemicals and asbestos insulation. Instead, firefighters will stand-off and attempt to prevent the fire from spreading to nearby forested areas.

2. Site history

The Old Saratoga Hospital had been originally built by Saratoga County in the late 19th Century as a wooden TB cure cottage. The original deed was for approximately 150 acres of land. The hospital was expanded over the years to meet an increasing patient demand, and in 1910 it was reconstructed into a stone and brick state-of-the-art medical facility, with a full basement, two upper floors, a steam plant and electrical generator facility. As other medical treatments to cure TB were developed the hospital became obsolete and was closed in 1960. In 1982 it was sold to a small construction company and some efforts were made to rehab the building into a senior citizen residence. It is believed that as part of the rehab effort a few hundred linear feet of asbestos pipe insulation was removed and stored in one of the basement rooms. During the June 29, 2015 recon the OSCs observed a basement room that contained over 50 bags labeled "Asbestos." Rehab efforts were terminated in 1982 and the property was abandoned by the current owner. Saratoga County officials have subsequently sold off surrounding parcels of the original deeded land to satisfy tax liens. The current property extends to approximately 25 acres, upon which sits the remains of the hospital, the WWTP, ruins of the former steam station and a vacant caretaker's cottage.

3. Physical location and site characteristics

The Site is located 10 miles west of Saratoga Springs, NY in a rural residential and farmland area. It is situated about 2 miles east of Lake Sacandaga, a major fishing and recreational resource. The hospital and adjacent WWTP sit on a rise approximately 50 feet from a stream that discharges directly into Lake Sacandaga.

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

This Action Memorandum addresses a removal action based on the threat posed by the unattended drums and pails of hazardous substances abandoned at the Site. Sulfuric acid is a CERCLA listed hazardous substance, as well as a RCRA D002 corrosive waste. Typical waste water treatment chemicals include sodium hydroxide and sodium hypochlorite, both of which are listed CERCLA hazardous substances; sodium hydroxide is a RCRA D002 corrosive waste.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants

The primary threat is posed by unattended and unsecured drums of hazardous substances and chemical wastes stored haphazardly in a readily accessible building that has a history of trespassers and squatters accessing the buildings on the Site. The existence of bulging drums of hazardous chemicals in close proximity to a navigable waterway poses a threat to nearby Sacandaga Lake, a major recreational water resource.

B. Check Applicable Factors (From 40 CFR 300.415) Which Were Considered in Determining the Appropriateness of a Removal Action

- ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances, or pollutants, or contaminants [300.415(b)(2)(i)].
- ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☐ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Situation and Removal Activities to Date

1. Current situation

The OSCs received verbal authorization to initiate an emergency removal action at the Site from the Deputy Division Director of the Emergency and Remedial Response Division and funding of \$147,000 to begin removal activities. Old Saratoga Hospital is a defunct business with no assets and the former owner/operator informed the OSC that he does not have the resources to respond to the releases or the continuing threat of a release.

2. Removal activities to date

EPA Region II has activated its ERRS contractor to assist in the removal of hazardous substances and wastes from the Site. There are no current or on-going removal activities at this Site being undertaken by other government or private parties.

B. Planned Removal Actions

1. Proposed action description

The proposed response action will involve stabilization of the drums, which would include overpacking (as necessary) and relocating all bulk containers to a secure area where they will be haz-cated and sampled. All containers will be stored in lined and locked CONEX boxes until ERRS can arrange to ship the containers off-Site for permanent disposal.

2. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the Site. However, at this time a long-term remedial action is not anticipated.

3. Applicable or relevant and appropriate requirements

ARARs within the scope of this removal action, including the RCRA and the Hazardous Materials Transportation Uniform Safety Act regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable. The Occupational Safety and Health Act regulations that pertain to health and safety will also be met to the extent practicable.

4. Project schedule

The activities to stabilize, move and dispose of hazardous wastes is anticipated to require three to five weeks to complete.

C. Estimated Costs*

Extramural Costs:	Current Cost
Regional Removal Allowance Costs:	\$147,000
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies.	
Cleanup Contractor Cost Contingency (20%)	\$
Total Cleanup Contractor Costs (ERRS)	\$147,000
Other Extramural Costs Not Funded from the Regional Allowance:	
Total RST, including multiplier costs	\$10,000
Total ERT Cost	\$
Total CLP	\$
Subtotal	\$10,000
Subtotal All Extramural Costs	\$10,000
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded to nearest thousand)	\$2,000
TOTAL REMOVAL ACTION PROJECT CEILING	\$159,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment. In particular, access by trespassers could result in a release of chemicals into the environment or exposure of the individuals(s) trespassing. Another fire in the main building could result in the pails of chemicals igniting and releasing products of chemical combustion to the environment.

VI. OUTSTANDING POLICY ISSUES

None

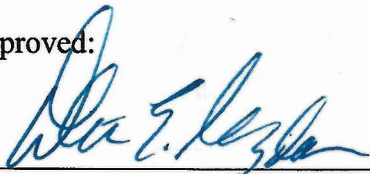
VII. APPROVALS

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and is 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. This document confirms the verbal authorization granted on July 14, 2015 for \$147,000 of which \$140,000 is for mitigation contracting. The total project ceiling is \$159,000 and this amount will be funded from the Regional Removal Allowance.

Please indicate your approval and authorization for the removal action for the Old Saratoga Hospital Site, as per current Delegation of Authority, by signing below.

Approved:



Walter E. Mugdan, Director
Emergency and Remedial Response Division

July 24, 2015
Date

Disapproved:

Walter E. Mugdan, Director
Emergency and Remedial Response Division

Date

After Approval:

cc: W. Mugdan, ERRD-D
A. Carpenter, ERRD-DD
E. Mosher, ERRD-RPB
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