

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

08/12/2015

Region ID: 02

Site Name: Old Saratoga Hospital

CERCLIS: NYN000201779

OUID: NA

SSID: A25L

Action: EMERGENCY REMOVAL ACTION

Region ID: 02

Doc ID: **500463**

Bates: NA

To: NA

Date: 08/12/2015

Pages: 4

Title: Old Saratoga Hospital Site, Administrative Record Index of Documents

Doc Type: Index

	Name	Organization
Author:	Paul L. Kahn, On-Scene Coordinator Response and Prevention Branch	EPA, REGION 2

Region ID: 02

Doc ID: **500464**

Bates: R2-000001

To: R2-000002

Date: 09/10/2014

Pages: 2

Title: Old Saratoga County Infirmary NYSDEC Spill Report Form

Doc Type: Spill Report

	Name	Organization
Author:	NA	NYSDEC

	Name	Organization
Addressee:	NA	NA

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

08/12/2015

Region ID: 02

Site Name: Old Saratoga Hospital

CERCLIS: NYN000201779

OID: NA

SSID: A25L

Action: EMERGENCY REMOVAL ACTION

Region ID: 02

Doc ID: [500465](#)

Bates: R2-000003

To: R2-000007

Date: 04/24/2015

Pages: 5

Title: Former Homestead Infirmary, Town of Providence, New York

Doc Type: Referral Letter

	Name	Organization
Author:	Gary S. Bowitch, Attorney at Law	Bowitch & Coffey, LLC
	Name	Organization
Addressee:	Robert Stegemann, Regional Director	NYSDEC, REGION 5

Region ID: 02

Doc ID: [500466](#)

Bates: R2-000008

To: R2-000009

Date: 05/20/2015

Pages: 2

Title: Referral Letter to EPA for a Removal Action

Doc Type: CERCLA Referral Letter

	Name	Organization
Author:	Andrew English, Director Bureau of Technical Support	NYSDEC
	Name	Organization
Addressee:	Walter E. Mugdan, Director Emergency and Remedial Response Division	EPA, REGION 2

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

08/12/2015

Region ID: 02

Site Name: Old Saratoga Hospital

CERCLIS: NYN000201779

OUID: NA

SSID: A25L

Action: EMERGENCY REMOVAL ACTION

Region ID: 02

Doc ID: [500467](#)

Bates: R2-000010

To: R2-000010

Date: 06/08/2015

Pages: 1

Title: Saratoga County Infirmary Consent for Access to Property

Doc Type: Consent for Access

	Name	Organization
Author:	Bruce G. Houran, Former President	Conifer Construction Group. Inc.
	Name	Organization
Addressee:	NA	EPA, REGION 2

Region ID: 02

Doc ID: [500468](#)

Bates: R2-000011

To: R2-000011

Date: 07/01/2015

Pages: 1

Title: Old Saratoga Hospital, Providence Township, NY, Site ID#: A25L, Contract #: EP-S2-10-03 – Environmental Restoration

Doc Type: Scope of Work Summary

	Name	Organization
Author:	Kelli Lucarino, On-Scene Coordinator Response and Prevention Branch	EPA, REGION 2
	Name	Organization
Addressee:	Anthony Tao, Contracting Officer	OPM/GCMB

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

08/12/2015

Region ID: 02

Site Name: Old Saratoga Hospital

CERCLIS: NYN000201779

OUID: NA

SSID: A25L

Action: EMERGENCY REMOVAL ACTION

Region ID: 02

Doc ID: [500469](#)

Bates: R2-000012

To: R2-000017

Date: 07/24/2015

Pages: 6

Title:

Title: 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

Doc Type: Action Memorandum

	Name	Organization
Author:	Paul L. Kahn, On-Scene Coordinator Response and Prevention Branch	EPA, REGION 2
	Name	Organization
Addressee:	Walter E. Mugdan, Director Emergency and Remedial Response Division	EPA, REGION 2



NYSDEC SPILL REPORT FORM

R2-000001



DEC REGION: 5	SPILL NUMBER: 1406203	
SPILL NAME: OLD SARATOGA COUNTY INFIRMARY	DEC LEAD: MJDPIET	
CALLER NAME: DAVID HOUSTON	NOTIFIER'S NAME: DAVID HOUSTON	
CLR'S AGENCY: PROVIDENCE FIRE CHIEF	NOTIFIER'S AGENCY: PROVIDENCE FIRE CHIEF	
CALLER'S PHONE: (518) 332-4131	NOTIFIER'S PHONE: (518) 332-4131	
SPILL DATE: 09/10/2014	SPILL TIME: 10:47 am	DISPATCHER: JJCLARK
CALL RECEIVED DATE: 09/10/2014	RECEIVED TIME: 10:47 am	

SPILL LOCATION

PLACE: OLD SARATOGA COUNTY INFIRMARY	COUNTY: Saratoga
STREET: BARKERSVILLE RD	TOWN/CITY: Providence
	COMMUNITY: PROVIDENCE
CONTACT: DAVID HOUSTON	CONTACT PHONE: (518) 332-4131
CONT. FACTOR: Other	SPILL REPORTED BY: Other
FACILITY TYPE: Commercial/Industrial	WATERBODY:

CALLER REMARKS:

Caller responded to fire at abandoned property that contained 50- 5 gallon buckets containing 1133 Adhesive, caller would like to speak with rep about the product

MATERIAL	CLASS	SPILLED	RECOVERED	RESOURCES AFFECTED
ADHESIVE	Other			

POTENTIAL SPILLERS

COMPANY	ADDRESS	CONTACT
UNKNOWN BUSINESS	BARKERSVILLE RD/ 4997 TAMIAMI TR EAST,	CONIPER CONSTRUCTION GI

Tank No.	Tank Size	Material	Cause	Source	Test Method	Leak Rate	Gross Failure
----------	-----------	----------	-------	--------	-------------	-----------	---------------

DEC REMARKS:

09/12/14:

1050: At Saratoga County Homestead Infirmary, Providence (T).

Met ECO Brian Toth. Inspected outside of facility, numerous access points, openings in surrounding fence.

As a precaution, we used P-95 masks before entering building because of asbestoes concerns raised by FD. Inside the lower back of building, west side, large open concrete basement rooms where fire damage was apparent. Numerous burnt and intact 1 and 5 gallon pails. Where markings were decernable, contents listed included adhesives, tars, and paints.

Ceiling and overhead pipes had been damaged by fire with significant spauling of concrete.

Took several inside and outside photos of site. One structure across pavement at rear of building is concrete, below grade,



NYSDEC SPILL REPORT FORM

R2-000002



DEC REGION: 5 SPILL NUMBER: 1406203

SPILL NAME: OLD SARATOGA COUNTY INFIRMARY DEC LEAD: MJDIPIET

appears to contain several large iron boilers and/or tanks. Very old.

PIN

T & A

COST CENTER

CLASS:

CLOSE DATE:

MEETS STANDARDS: False

GARY S. BOWITCH
EMAIL: BOWITCH@BCALBANY.COM

ATTORNEYS AT LAW

DANIEL W. COFFEY
BLITHE STASIAR, Partner

April 24, 2015

Robert Stegemann, Regional Director
Department of Environmental Conservation - Region 5
1115 NYS Route 86
P.O. Box 296
Ray Brook, NY 12977-0296

RECEIVED

APR 27 2015

NYSDEC - REGION 5
ENVIRONMENTAL QUALITY

Re: Former Homestead Infirmary, Town of Providence, New York

Dear Regional Director Stegemann:

I represent Saratoga County with respect to the environmental conditions at the former Saratoga County Homestead Infirmary, located on Bakersville Road, Town of Providence, New York ("Homestead Site"). We write because the Homestead Site now contains an abandoned, deteriorating building, easily accessible to the public, which we believe is releasing hazardous asbestos containing materials directly into the environment.

Some background on the Homestead Site may be helpful. In 1914, the Homestead Tuberculosis Sanitarium was opened for the treatment of tuberculosis patients. The facility operated as a tuberculosis sanitarium until 1960. In 1961, the facility was reopened and operated as the Saratoga County Infirmary until 1972-73, when the infirmary was closed down. The property was maintained in good condition by the County until it was sold in 1982 to Bruce G. Houran and Robert Chapman who planned to redevelop the site.¹ Unfortunately, since the time of the sale by the County, the owner was unsuccessful in his efforts to redevelop the property. The main facility building fell into significant disrepair and was vandalized repeatedly over many years, and the building is presently in a very deteriorated condition.

Though a fence was installed around the former facility building many years ago, sections of the fence are easily breached. Many of the windows have been destroyed and many doors to the building have been removed, making access to the structure very simple. In fact, in the recent past, vandals entered the building and removed metal piping and other salvageable materials. In so doing, many internal walls and internal ceilings were disturbed or pulled down, resulting in the release of friable asbestos containing materials (ACM) both within the building and through open windows and doors. Additionally, portions of the building roof, believed to contain ACM, have collapsed into the structure. None of these conditions existed at the time the County transferred ownership of the site to Houran.

¹ After several title transfers, the current owner is Conifer Construction Group, Inc. Its owner and president, Bruce G. Houran, moved to Florida several years ago and filed for bankruptcy in 2014.

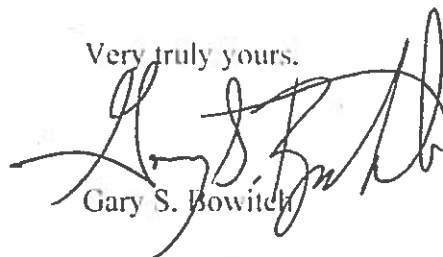
A November 2012 YouTube video (www.youtube.com/watch?v=lo_qtVqnbDM) shows the very seriously deteriorated condition of the building in 2012. There has been no improvement of these conditions since that time. The building is frequented by teenagers as a place to hang out. In fact, on September 8, 2014, a fire was started within the building necessitating immediate response by the Providence Fire Department. We enclose numerous recent photos of the Homestead Site, which show the dilapidated condition of the structure, both inside and out, the grounds immediately surrounding the structure, the existence of drummed materials, as well as the inadequacy of the current fencing.

Because the County is not the owner of the property, it has not obtained any environmental samples around the outside of the building. However, as a result of the above history of vandalism and the extensive deterioration of the structure, we believe that it is highly likely that hazardous asbestos has been released directly into the environment at the Homestead Site. Moreover, given that friable asbestos exists within this dilapidated structure, there remains a very real on-going threat of continued releases to the environment. In short, the Homestead Site represents a significant threat to the public health and the environment.

Unfortunately, given that the County does not own the Homestead Site, it has no ability to either prevent the public's access to it or to stop the on-going releases of asbestos. Given the environmental dangers present at the site and the County's inability to address them, we want to bring this important matter to your attention. Our sincere hope is that with the immediate involvement of the Department and, as appropriate, the USEPA, the process of addressing the past and on-going releases and the threat of further releases of hazardous materials into the environment can begin in earnest.

The County is, of course, prepared to assist the Department in any way possible. Once you have discussed this with your staff, please contact me to discuss future steps to bring this on-going significant threat under control.

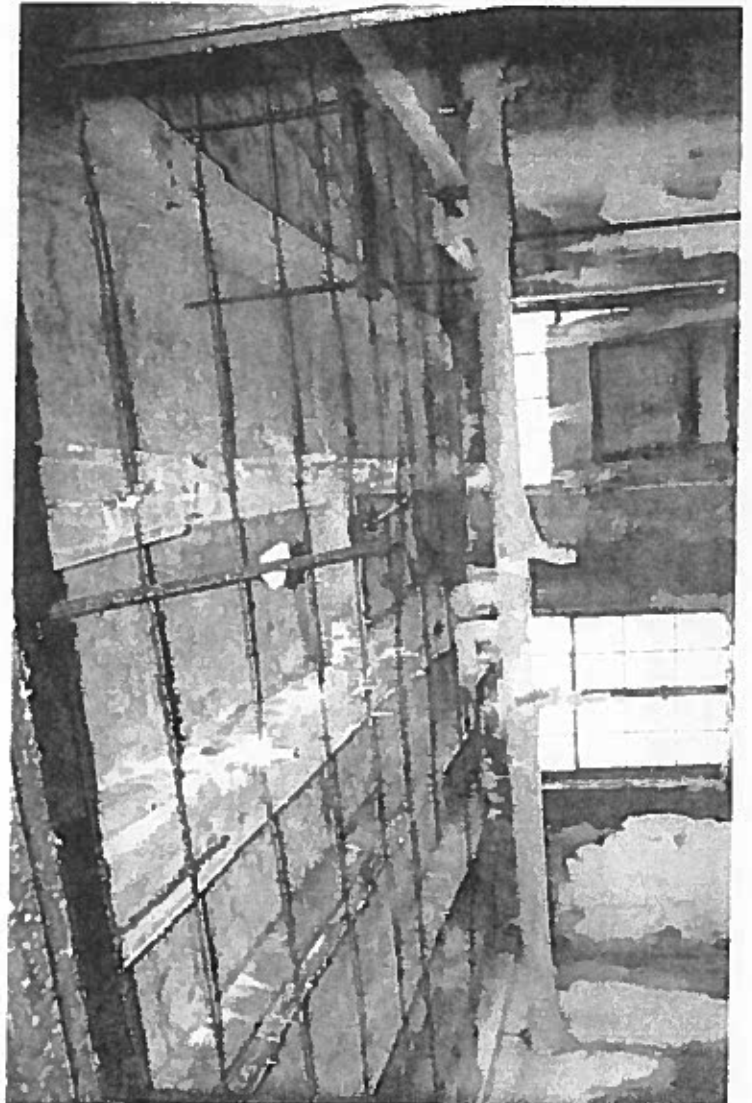
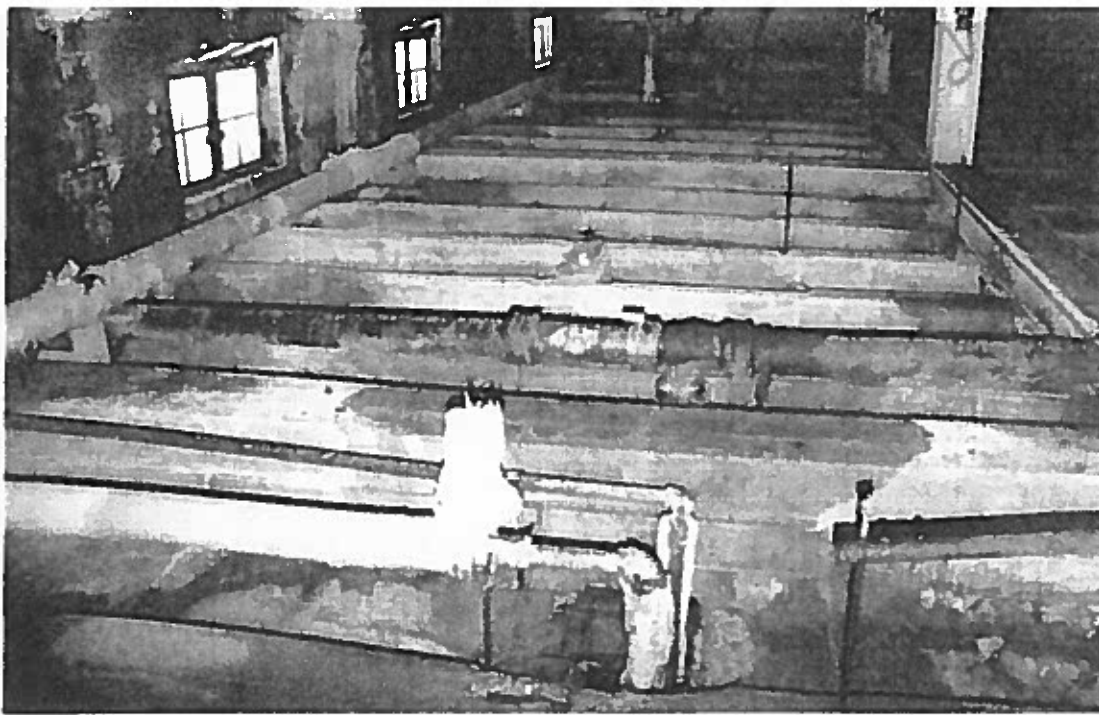
Very truly yours,

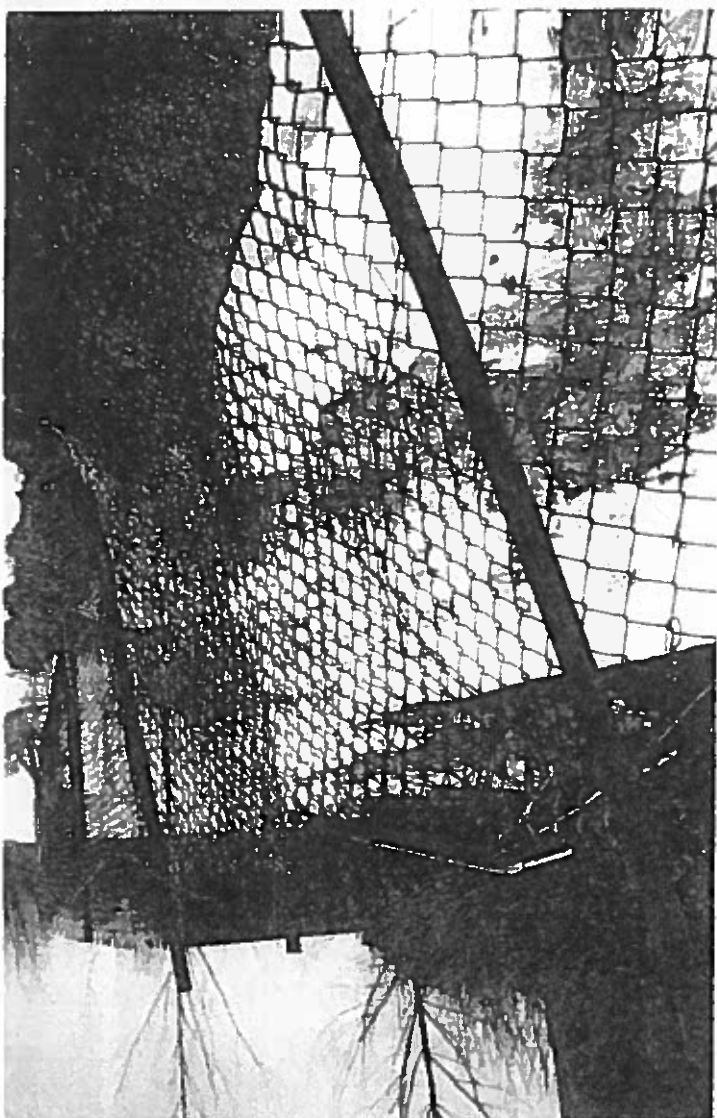


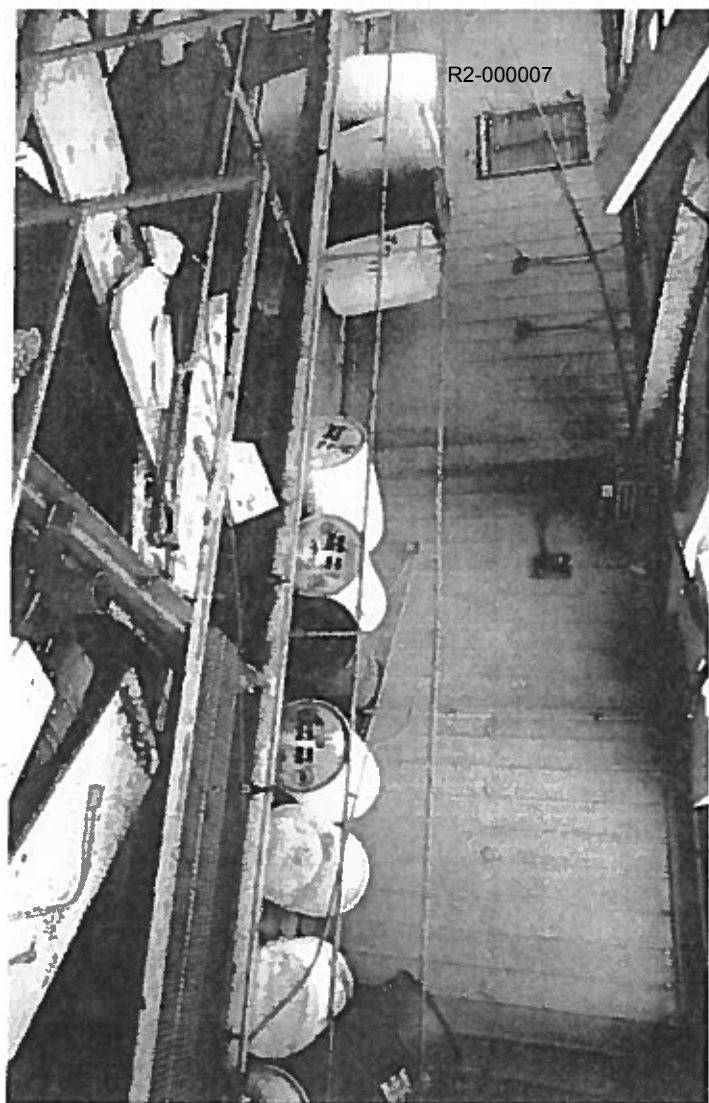
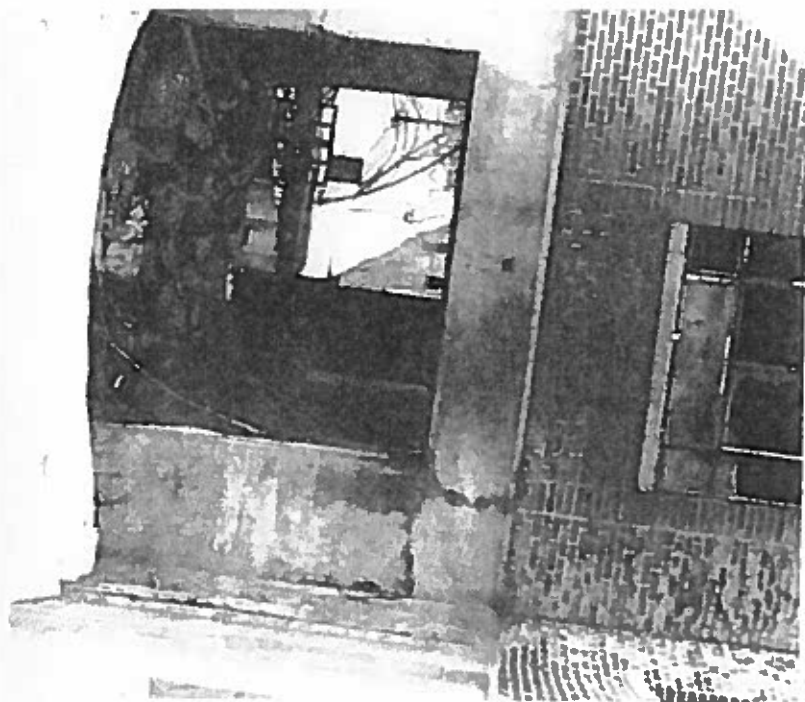
Gary S. Bowitch

Encls.

cc: Steven Dorsey, Saratoga County Attorney
John M. Collyer, Supervisor, Town of Providence
Russell Huyck, Regional Engineer, NYSDEC, Region 5
Daniel J. Eaton, Engineering Geologist, NYSDEC,
Division of Environmental Remediation







NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Bureau of Technical Support
625 Broadway, 11th Floor, Albany, NY 12233-7020
P: (518) 402-9543 | F: (518) 402-9547
www.dec.ny.gov

May 20, 2015

Mr. Walter Mugdan, Director
Emergency & Remedial Response Division
United States Environmental Protection Agency
Region II
290 Broadway
New York, NY 10007-1866

Re: Removal Action Evaluation
Former Homestead Infirmary
NYSDEC Spill No. 1406203
Barkersville Road
Providence (T), Saratoga (Co.), NY

Dear Mr. Mugdan:

The New York State Department of Environmental Conservation (NYSDEC) requests that the United States Environmental Protection Agency (USEPA) evaluate the site reference above for a CERCLA emergency removal action. This site has been discussed with Paul Kahn, USEPA Federal On-Scene Coordinator (OSC), Edison, New Jersey.

Previously, this site was a county tuberculosis sanitarium which began operation in 1914 and operated until 1960. In 1961 it reopened as the Saratoga County Infirmary and operated until 1972 or 1973. The County sold the property to a private individual in 1982 who planned to redevelop the site. The redevelopment never came to pass and the property has fallen into disrepair. After several title transfers, the current owner is believed to be Conifer Construction Group, Inc., owned by Bruce Houran, who reportedly filed for bankruptcy in 2014.

NYSDEC spill number 1406203 was opened on September 10, 2014 as a result of a fire in a structure at the site and reports from emergency responders that they observed potentially hazardous substances. Officials with the Providence Volunteer Fire Department indicated that the fire had been addressed but there remained numerous containers of adhesives, paints, and other flammable materials, as well significant quantities of friable asbestos, at the site.



Department of
Environmental
Conservation

The facility lacks electricity and does not have working smoke detectors or site security. Windows and doors have been removed or broken due to trespassing and vandalism. The site has a perimeter fence, but it is in poor repair and has at least one very large breach. On September 12, 2014, NYSDEC staff inspected the property and confirmed the earlier observations of the fire department.

The principal environmental threat is the potential for the unsecured chemicals and asbestos to be released to the outside environment either through the actions of wind and rain or catastrophically in the event of another structure fire. The site has had unauthorized access as evidenced by the recent fire, graffiti, and staff observation of mattresses and discarded food and beverage containers. Trespassers would be exposed to site hazards as a consequence of their intrusions. To address these threats, we request that USEPA consider an emergency removal action to address the immediate threats.

Any questions or request for additional information regarding this site should be directed to Michael DiPietro, NYSDEC, Region 5, at (518) 623-1236.

Sincerely,



Andrew English, P.E.
Director
Bureau of Technical Support

cc: E. Mosher – USEPA, Region II, Edison, NJ
J. Daloia – USEPA, Region II, Edison, NJ
G. Zachos – USEPA, Region II, Edison, NJ
P. Kahn – USEPA, Region II, Edison, NJ
K. Lucarino – USEPA, Region II, Edison, NJ
D. Farrar – NYSDEC, Albany
R. Huyck – NYSDEC, Region 5
M. DiPietro – NYSDEC, Region 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

CONSENT FOR ACCESS TO PROPERTY

Name of Property: Saratoga County Infirmary

Address of Property: 7239 – 7267 Barkersville Road, Providence Township, Saratoga
County, NY

(CCG)
~~CONIFER CONSTRUCTION~~ ^{GROUP, INC. IS} the owner, or represent the owner, of the above property. I authorize officers, employees, contractors, subcontractors and other authorized representatives of the United States Environmental Protection Agency (collectively referred to as "EPA") to enter into the above premises and lands pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9601 et seq., for the following purposes:

1. Perform an assessment of the premises and lands for the presence of hazardous substances, pollutants or contaminants.
2. Take samples from drums, chemical totes, storage tanks, bags and other containers.
3. Initiate security guard service or functionally equivalent perimeter control.
4. Initiate a response action to stabilize, neutralize and/or remove hazardous substances, contaminants or pollutants in accordance with CERCLA and National Contingency Plan (the "NCP") 40 CFR Part 300.
5. Dispose of hazardous substances, contaminants, or pollutants.
6. Take any additional response actions at the Site which EPA determines are necessary and are not inconsistent with the NCP.

I grant the EPA access to the above property voluntarily, without any threats or promises sought or given, and without admitting any facts or liability. I understand that this access may be withdrawn by me at any time. I understand that should access be withdrawn the EPA reserves its right to seek access to the property by any authorized means, including seeking judicial access in federal Court. I certify that ~~CCG IS~~ ^{THEY} the owner of this property and that ~~they~~ have the authority to grant access to the EPA for the above listed activities.

Signed Bruce G. Houran

Title FORMER PRESIDENT OF CCG, INC.

Print BRUCE G. HOURAN

Date 6/8/15

DATE: July 1, 21015

SUBJECT: Old Saratoga Hospital
Providence Township, NY
Site ID#: A25L
Contract #: EP-S2-10-03 – Environmental Restoration

FROM: Kelli Lucarino, OSC
Response and Prevention Branch

TO: Anthony Tao, Contracting Officer
OPM/GCMB

BACKGROUND:

The objective of this Task Order is to perform building security and stabilize, consolidate and properly dispose and/or recycle over 50 drums and containers located within the Site structures and on the Site property located at 7239-7267 Barkersville Road in Providence Township, New York. The drums and containers contain CERCLA-designated hazardous substances and pose a serious threat of fire and explosion which could result in a release to the nearby residential community. All of these substances will be managed to facilitate off-site disposal in accordance with local, state and federal requirements.

STATEMENT OF WORK:

The contractor shall in accordance with the contract provide all necessary personnel, equipment and materials to perform the following:

1. Mobilize RM, FCA and two clean up technicians to site and conduct building security operations and drum and container stabilization operations in conjunction with the OSC.
2. Prepare a Health and Safety Plan and Work Plan to stabilize, secure, sample and dispose of material.
3. Provide necessary equipment and personnel to efficiently complete the tasks in the Work Plan approved by the OSC.
4. Provide daily progress reports and daily cost reports (RCMS)

Additional technical direction will be provided by the On-Scene Coordinator through written daily work orders.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1868

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

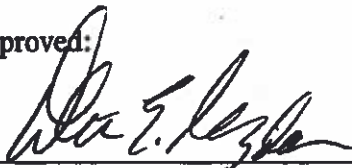
VII. APPROVALS

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
J. Daloia, ERRD-RPB
J. Rotola, ERRD-RAB
B. Grealish, ERRD-RAB
A. Tao, OPM-GCMB

A. J. Boswer, PAD
K. Giacobbe, OPM-GCMB
P. McKechnie, OIG
R. Craig, RST
L. Rosman, NOAA
A. Raddant, USDOJ