

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Bio-Tech Mills (RV3) - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #1
Initial - Asbestos Abatement and Container Waste Recovery & Disposal
Bio-Tech Mills (RV3)
02V6
Greenwich, NY
Latitude: 43.1096298 Longitude: -73.4219230

To:
From: Mark Gallo, On-Scene Coordinator
Date: 4/1/2015
Reporting Period: 10/14/14 - 03/27/15

1. Introduction

1.1 Background

Site Number:	02V6	Contract Number:	EP-S2-10-01
D.O. Number:	0075	Action Memo Date:	9/30/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/30/2014	Start Date:	10/9/2014
Demob Date:		Completion Date:	
CERCLIS ID:	NYD980778823	RCRIS ID:	NYD980778823
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency removal action referred by the New York State Department of Environmental Conservation (NYSDEC) on July 8, 2014.

1.1.2 Site Description

The Site is the location of a defunct consumer paper products manufacturing facility. The 4.5-acre Site is comprised of a dilapidated manufacturing facility and paper mill that operated from 1972 to 1995. This facility manufactured consumer sanitary paper products, including facial tissue and toilet paper. The Site buildings are in a severe state of decay and previously conducted metal scrapping activities have left parts of the manufacturing building severely damaged. The Site is located in a rural area with residential properties in close proximity and the Batten Kill River running along the eastern portion of the Site property.

1.1.2.1 Location

The Site is located at 2822 NY Route 29 in Greenwich, Washington County, New York. Greenwich is a small community approximately 25 miles northeast of Albany, New York and 25 miles east of Saratoga Springs, New York.

Site Coordinates: 43°06'34.34"N latitude, -73° 25'18.31"W longitude.

1.1.2.2 Description of Threat

There is a threat to human health posed by friable ACM present at the Site. Friable ACM was observed in the form of thermal systems insulation (TSI) on pipes formerly used to provide steam to former plant operations. The friable ACM was observed in deteriorating condition, hanging from pipes as well as found on the floor areas below some of the piping. Prior metal scrapping operations and partial demolition of the Site building has left the friable ACM exposed to the elements with a potential threat for off-site release.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 8, 2014, the NYSDEC referred the Site to U.S. Environmental Protection Agency (EPA) to assess and consider the Site for a removal action to address CERCLA hazardous substance that are present and pose a potential threat of direct contact to human health.

From August 18-20, 2014, The EPA Removal Action Branch (RAB) conducted a removal site evaluation (RSE) of the Site. EPA observed friable ACM as well as several smaller containers (1-15 gallon) of waste that included dielectric oils and paints. EPA observed the Site building to be in deteriorating condition and noted that part of the building had been involved with a prior demolition activity. Prior demolition and metal scrapping activities left large portions of the western perimeter walls open, exposing much of the friable asbestos pipe insulation to the elements (i.e. wind, rain, snow).

As part of the RSE, samples were collected from the smaller containers as well as from suspect ACM which included the deteriorating insulation on piping at the facility. Results from the pipe insulation document the material as containing amosite and chrysotile asbestos in percentages greater than 1%, with the highest recorded levels being at 28.6% amosite and 13.3% chrysotile. Soil samples were also collected and analyzed for asbestos. Results from the soil sampling documented asbestos in the soil at 0.25 percent.

The EPA RSE concluded that conditions at the Site meet the criteria for a removal action under CERCLA as documented in Section 300.415(b)(2) of the National Contingency.

2. Current Activities

2.1 Operations Section

2.1.1 Response Activities

From October 20 – 30, 2014 ERRS worked on subcontracting for a NY State licensed asbestos contractor that would be performing work that includes; develop asbestos project plan and petition for any variances needed, project monitoring, and third party air sampling as required by NY State Code Rule 56. A Site walk was conducted with the potential bidders on October 30, 2014. ERRS awarded the subcontract the following week and work began drafting the project plan and petition of variance. A final project plan and petition for variance was submitted to the NYSDOL on November 24, 2014 with NYSDOL approval received on November 25, 2014.

Following the receipt of the NYSDOL approved variance petition, ERRS solicited bids for a NYS licensed asbestos abatement contractor to conduct the asbestos abatement in accordance with NY Code Rule 56 and the approved variance. Bid packages were sent to several abatement contractors on 12/3/2014 with a mandatory Site walk being conducted on December 17, 2014. All bids were received on 12/23/14 with an award made on 12/26/14.

On 1/5/2015, ERRS and its subcontracted project monitoring firm (Ambient Environmental) and asbestos abatement contractor (Atlantic Contracting & Specialties) mobilized to the Site to conduct the initial setup for asbestos abatement activities. Abatement activities began on 1/6/2015 and involved the removal of approximately 600 linear feet of friable ACM from piping within the facility. Abatement activities were completed on 1/10/2015 with final clearance air samples collected on 1/12/2015. Following the collection of clearance air samples, the abatement contractor attempted to complete encapsulation of the piping from which asbestos material was removed. Due to the colder temperatures at the Site, encapsulation was unable to be completed and was postponed until a later date when temperatures rose above freezing for a sustained period.

On 1/15/15, one 30 cubic yard roll-off container was shipped off-site to Ontario County, NY landfill for disposal. This container was filled with 1.35 tons of material generated from the asbestos abatement activities. All asbestos waste was double-bagged in 6 mil poly bags and appropriately labeled with asbestos hazard warnings and information regarding the generator and the Site. All ERRS subcontractor resources were demobilized on 1/15/15, following the off-site shipment of the asbestos waste.

During the week of 1/5/15, ERRS worked to collect, stage, and secure 30 smaller containers (ranging in size from 1 –5 gallons) of oil, grease, and paints/stains found within the debris piles at the Site. Within these containers was approximately 6 gallons of oil drained from a facility mounted transformer along the Site's eastern perimeter wall. A sample was collected from the transformer oil and shipped to a NELAP accredited laboratory for PCB analysis. Result from this sample were reported as not containing PCBs. All the smaller containers were inventoried and packaged (Labpack) into DOT shippable containers and shipped off-site on March 19, 2015.

During the Week of March 23, 2015, the ERRS asbestos abatement contractor was on-site to complete the encapsulation of all piping from which ACM was removed. As of March 27, 2015, all EPA and contractor resources were demobilized from the Site and the initial removal actions documented in the RV3 Action Memorandum were completed. The only remaining activities to be conducted on-site include additional evaluation of asbestos found at low levels in soil around the former manufacturing building on-site. EPA is working to establish required activity-based sampling procedures to best document the exposure scenarios at the Site.

2.1.2 Enforcement Activities

No viable potentially responsible parties (PRPs) have been identified at this point in time. EPA will continue to work to identify any viable PRPs.

2.1.3 Waste Disposition Table

Waste Stream	Quantity	Manifest #	Disposal
Asbestos Waste / Debris	1.35 tons	WID 43759	Ontario County Landfill/Casella Waste Systems/Stanley, New York
Waste Flammable Liquids (D001, D004, D005, D007, D012, D013)	(1) 85 gal Overpack	012265424 JJK	Enpro Services of VT(VTR 000 517 052)
Waste Paint Related Material(D001, D035)	(1) 85 gal Overpack	012265424 JJK	Enpro Services of VT(VTR 000 517 052)
Waste Transformer Oil (non-PCB)	(2) 5 gal	012265424 JJK	Enpro Services of VT(VTR 000 517 052)

2.2 Planning Section

2.2.1 Planned Response Activities

Activity based sampling to determine the risks and threat of exposure from ACM in soils surrounding the Site.

2.2.2 Issues

Cold weather (below freezing) impacted the ability of the abatement contractor to complete the encapsulation. Encapsulation was delayed until late March 2015 when temperatures in the region began to rise consistently above freezing.

2.3 Logistics Section

No issues or topics to report

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

None

3. Participating Entities

This action is a CERCLA fund-lead action, however EPA has coordinated removal activities with the NYSDEC.

4. Personnel On Site

EPA On-Scene Coordinator	1
EPA ERRS Contractor	1
ERRS Subcontractors (Licensed Project Monitoring)	1
ERRS Subcontractor (Licensed Asbestos Abatement Contractor)	5

5. Definition of Terms

None

6. Additional sources of information

6.1 Reporting Schedule

Another Pollution Report will be issued following the on-site activities involving activity-based sampling to assess risks and threats from asbestos in soil. That activity has not yet been scheduled but is anticipated to occur late spring / early summer 2015.

7. Situational Reference Materials

None at this time