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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #2**
Final Pollution Report
Bio-Tech Mills (RV3)
02V6
Greenwich, NY
Latitude: 43.1096298 Longitude: -73.4219230

To:
From: Mark Gallo, On-Scene Coordinator
Date: 9/15/2015
Reporting Period: 3/28/15 - 9/3/15

1. Introduction

1.1 Background

Site Number:	02V6	**Contract Number:**	EP-S2-15-01
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:	8/20/2015	**Completion Date:**	8/20/2015
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

Non-Friable Asbestos Abatement

On 4/29/2015, the EPA OSC was on-site with a Region 2 Risk Assessor to evaluate a portion of the facility that had been part of a previous, incomplete demolition operation. The area covers approximate 5,500 square feet and contained source ACM in the form of small, broken transite pieces, most likely left from demolition of the roof area.

After consultation between the Risk Assessor and Removal Program, a decision was finalized on 5/29/2015 to conduct the recovery of the visible transite material and follow up with activity-based sampling to determine if an unacceptable risk exists to the public.

On 7/16/2015 a task order was issued to the Emergency and Rapid Response Services (ERRS) contractor for the recovery, packaging and off-site disposal of transite from the facility grounds. On 8/20/2015 the EPA ERRS contractor provided NYSDOL certified asbestos handlers along with a licensed third party monitoring firm to complete the remaining asbestos removal activities involving the recovery, packaging, and off-site shipment of transite from the grounds of the facility. Approximately 6 cubic yards of transite material was recovered and shipped off-site. Third party asbestos sampling results from the abatement activity were all reported as less than 0.01 f/cc, acceptable for final clearance sampling under the NYSDOL approved variance.

Risk Assessment Sampling

On 8/26/2015 EPA and RST3 were on-site to conduct activity-based, risk assessment sampling at and around the demolished building area. One background area was sampled along with 5 samples collected within the approximate 5,500 square foot demo area. The activity based sampling event was conducted to simulate a site worker in a windy environment. RST collected samples in the demolition debris area while utilizing a 150 cfm blower to agitate the debris in the sampled area periodically throughout the day. Samples were shipped to a NY State certified laboratory for PCM analysis. Results from the activity-based sampling event were received on 9/3/2015. All results from the sampling event were reported as less than or equal to 0.002 f/cc.

Several scenarios were considered for assessing risk from asbestos under the current conditions at the Site. The following table includes the scenarios / receptors and its associated risk screening level;

Risk Scenario	Risk Screening Level
Industrial - 25 year exposure	0.002 f/cc
Industrial - 25 year exposure with time-weighted average	0.01 f/cc
Trespasser - once a week for five years	0.15 f/cc
Trespasser - 30 days a year for five years	0.26 f/cc
Trespasser - 30 days a year for one year	1.3 f/cc

While all risk assessment samples were reported as less than or equal to 0.002 f/cc, the most conservative risk screening level, EPA considered the Industrial, 25 year exposure with time weighted average the more appropriate risk level for the current use and/or conditions at the Site. The 25 year time weighted average risk levels is consistent with a site worker being on-site for an 8 hr day, 40 hour work week, over the course of 25 years. In that scenario, the risk screening level is currently at 0.01 f/cc.

Based on the current site conditions, site use, recent abatement activities, and risk assessment sampling activities, EPA has made the determination that no additional abatement activities are required at the Site. If Site conditions change and/or if additional information related to actual risk to the public becomes available or is modified, EPA may have cause for additional assessment and/or removal action(s).

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 galOverpack	012265424 JJK	Enpro Services of VT (VTR 000 517 052)
Waste Paint Related Material(D001, D035)	(1) 85 galOverpack	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)
Asbestos Waste / Transite Debris	6 cu yd (est)	BTMNF082015-01	Seneca Meadows LF Waterloo, NY

2.2 Planning Section

2.2.1 Planned Response Activities

No additional activities are planned at the Site. This is the final pollution report for this action at the Site.

2.2.2 Issues

None to report.

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)	2
RST (Risk Assessment Sampling	2

5. Definition of Terms

None

6. Additional sources of information

6.1 Reporting Schedule

This is the final pollution report for this action at the Site.

7. Situational Reference Materials

None at this time