

**United States Environmental Protection Agency
Region II
POLLUTION REPORT**

Date: Friday, January 13, 2006

From: Paul L. Kahn

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Subject: Stevens & Thompson Paper Company
192 County Route 53, Middle Falls, NY
Latitude: 43.1033000
Longitude: -73.5353000

POLREP No.:	15	Site #:	WJ
Reporting Period:		D.O. #:	0029
Start Date:	12/12/2005	Response Authority:	CERCLA
Mob Date:	12/12/2005	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	EP-W-04-054
RCRIS ID #:			

Site Description

The Site is a defunct tissue paper manufacturer aka paper converting) located in a rural area of Greenwich, NY, 20 miles east of Saratoga Springs, NY.

The company became defunct 2 years ago, had filed for liquidation bankruptcy, and the owner walked away from the property. The plant was purchased by St. Regis Investments, LLC, a company based in California. The original intent was to reopen the plant, but due to economic considerations the plant will be demolished and sold for residential development.

The Site occupies 27 acres in a rural/residential area, and is perched on the edge of a cliff over the Battenkill River. It has one large brick and wood, multi-level manufacturing consisting of a warehouse, two hydroelectric power plants, manufacturing areas, a lab, offices, and repair shops. There is a boiler house and an associated 20,000 gallon AST for waste oil. There are a number of small out-buildings used for vehicle and misc. equipment storage.

Security guard service was in-place from 8AM to 6PM, seven days a week, but was discontinued. The facility has limited access via a dirt road, however, the property is unfenced and the buildings are unlocked and unsecured.

Initially, this was an RP-lead removal action without an enforcement document. However, at a point in the removal activities the RP informed EPA that he did not have the funds to continue the removal action, and asked that EPA take over. After deliberating on the turn of events, and with a written site referral from the NYSDEC, EPA agreed to complete the removal action.

In connection with this proposed activity, the OSC and members of the US Coast Guard Atlantic Strike Team visited the Site on September 6, 2005 to conduct field sampling/testing on 10 drums of unknown chemicals staged at the Site. Test results revealed the presence of corrosive waste chemicals and flammable waste chemicals.

Current Activities

Removal activities continue. ERRS crew continues to collect small containers of chemicals from various locations around the Site, now totaling 850. A total of 72 55-gallon drums have been staged also. ERRS has also moved 20 full, partially full, or empty bulk chemical totes, two portable mixing vats, and 2 full, poly, spill containment pallets from process areas throughout the Site into the main warehouse area and staged same on plastic. ERRS has also started to stage empty drums for recycling.

ERRS chemist has completed lab-packing and will begin haz-cating the drums of unknown chemicals for bulking schemes and composite bulk samples for disposal.

Because of the incident with the intruder during the holiday crew demobe, and an almost repeated incident last week, security guard service has been initiated from 5PM Fridays until 7AM on Mondays. Cost of this necessary service is being borne equally by the owner of the mill and EPA. Guard service will be continued on weekends until the completion or removal activities or the takeover of the removal action by the RP(s).

ERRS reported to the OSC that 3 bulk chemical totes may not be able to be moved due to their remote location within process equipment on lower levels of the mill. OSC and RM are reviewing possible options to address the chemicals in these totes.

Planned Removal Actions

ERRS chemist will begin sampling and haz-cating drums of unknown chemicals now staged in loading dock area. To assist in this activity, OSC has arranged with the Atlantic Strike Team to deploy 2 individuals to the Site for the week of January 16th to assist ERRS chemist in sampling and haz-cating.

OSC will begin to contact the suppliers of the chemical totes to make arrangements for them to send trucks to retrieve the totes (and the chemicals) as returned goods. As was done previously with almost 23,000 gallons of chemicals shipped from this Site, this will result in no direct cost to the government for transportation or disposal of the chemicals.

OSC will draft memo requesting a mitigation ceiling increase of \$100,000 to cover additional removal costs, including T & D of drums of unknowns, lab-packed chemicals, small chemical containers, and asbestos insulation.

Next Steps

ERRS will begin sampling and haz-cating 60-70 drums of unknown chemicals. Once this is complete, ERRS chemist will be able to group drums by compatible material and begin composite sampling for disposal profiles.

OSC will begin contacting chemical suppliers to make arrangements for return shipping of all chemical totes.

Continue with security guard service Friday evenings to Monday mornings.

OSC will invite local fire chief to visit Site for briefing and tour of chemical storage areas.

Key Issues

Key issues are identifying all unknown chemicals for disposal purposes, returning all chemical totes to original suppliers, site security, and cold weather health and safety concerns.

response.epa.gov/SandTPaper