

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

**Date:** Thursday, January 19, 2006

**From:** Paul L. Kahn

**To:** Eric Mosher, USEPA , Region 2, ERRD-RPB Tim Grier, USEPA Headquarters 5202G  
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James Daloia, USEPA, Region 2, ERRD-RPB Jerry Squires, Middle Falls Fire Department

**Subject:** S&T Paper Week of 01/16/06  
Stevens & Thompson Paper Company  
192 County Route 53, Middle Falls, NY  
Latitude: 43.1033000  
Longitude: -73.5353000

<b>POLREP No.:</b>	16	<b>Site #:</b>	WJ
<b>Reporting Period:</b>	01/16/06-01/20/06	<b>D.O. #:</b>	0029
<b>Start Date:</b>	12/12/2005	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	12/12/2005	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>		<b>Contract #</b>	EP-W-04-054
<b>RCRIS ID #:</b>			

#### 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

Chemist from ERRS completed lab-packing and began sampling/haz-cating drums of unknown chemicals. OSC arranged for two persons from the USCG AST to be on-site to assist chemist in haz-cating activities, and approximately 65 of 80 drums were sampled and haz-cated as of 01/19/06. Based on the chemical characteristics learned, ERRS will begin devising bulking schemes for composite sampling

for disposal profiling.

ERRS relocated and staged 20 full, partial, and empty bulk chemical totes, 2 portable mixing vats, and 2 poly spill containment devices, from process areas throughout the Site, to the warehouse staging area. OSC will begin contacting chemical suppliers to make arrangements for them to send trucks to retrieve their chemical totes at no cost to the government.

Chief Squires of the Middle Falls was contacted and is aware of staging area location. Weekly PolReps will be forwarded to the Fire Department

Milder winter temperatures continue to help thaw frozen chemical containers, but sub-freezing night time temperatures create ice hazards in the early part of the day, hampering outside movement. Guard service initiated from 5PM Fridays until 7AM Mondays. Cost of this service is shared 50/50 with mill owner and EPA. Additional Site security was requested for several week nights to monitor heater and drum thawing.

OSC Daly running Site 01/16/06-01/20/06 for OSC Kahn who was on annual leave.

### **Planned Removal Actions**

ERRS chemist has started sampling and haz-cating drums of unknown chemicals now staged in loading dock area. To assist in this activity, the USCG Atlantic Strike Team was brought 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 continue sampling and haz-cating approximately 80 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.

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