



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

DEC 04 2014

Mr. Eric Schrading
Field Office Supervisor
U.S. Fish and Wildlife Service
927 North Main Street (Bldg. D.)
Pleasantville, New Jersey 08232

RE: Curtis Specialty Papers Superfund Site

Dear Mr. Schrading:

This letter is intended to reinitiate informal consultation with the U.S. Fish and Wildlife Service (FWS), to determine whether there are any federally-listed or proposed threatened or endangered species or critical habitats present on or in the vicinity of the Curtis Specialty Papers Superfund Site, located in the Borough of Milford, Hunterdon County, New Jersey.

This site, located along the Delaware River, has been affected by historic paper mill operations that have resulted in PCB contamination in site soils, as well as in sediments found in Quequacommisacong Creek, which runs through the project area.

Previously, EPA determined that the proposed project would have no effect on the federally-listed endangered Indiana bat (*Myotis sodalis*), or the federally-listed threatened bog turtle (*Clemmys muhlenbergii*), due in part to a lack of habitat for either species. Nevertheless, several years have passed since these determinations, and we subsequently utilized the FWS' iPac tool for an updated species list. This effort returned the two species noted above, plus the northern long-eared bat (*Myotis septentrionalis*), which has recently been proposed for listing as an endangered species.

Therefore, in compliance with the mandate of Section 7 of the Endangered Species Act of 1973, as amended, EPA is requesting a written statement from your office advising us concerning the range of territory covered by any of the above-noted species that may be found in the project area, and whether any future remedial action for the site may result in impacts to these species or their critical habitats. Toward this end, I have enclosed the iPac report, a project summary, and a map of the project area for your review.

If you have any questions, or require additional information, please have your staff contact me at (212) 637-3759, or by email at ferreira.steve@epa.gov. We appreciate your assistance in this matter.

Sincerely yours,

Steven Ferreira,
EPA Region 2
Environmental Review Section

cc: A. Hess, ERRD-SPB

Enclosures

283170



Curtis Specialty Papers

New Jersey

EPA ID#: NJD057143984

EPA REGION 2

Congressional District(s): 12

Hunterdon

404 Frenchtown Road

NPL LISTING HISTORY

Proposed Date: 9/3/2008

Final Date: 9/23/2009

Site Description

The Curtis Specialty Papers site is a former paper mill occupying approximately 109 acres at 404 Frenchtown Road in Hunterdon County, New Jersey. Most of the site is on two parcels totaling about 70 acres that are located in Milford Township. The aeration pond is on an adjacent parcel of approximately 35 acres located in Alexandria Township.

The site includes a number of buildings, including the main mill building, former coatings facility, a cogeneration power plant, and a wastewater treatment plant. The paper mill operated for approximately 90 years. The main mill, known as the Milford Mill, is comprised of approximately 61 separate areas and was used to convert paper pulp to finished food grade paper. The former coatings facility is located approximately 400 feet northwest of the main Milford Mill building. The coatings facility operated from approximately 1935 to 1988; in these buildings, solvent-based resins were compounded and coated onto paper and other products.

The surrounding area is predominantly residential, with the nearest residences approximately 0.1 mile to the north and southeast. Quequacommissacong Creek, officially known as Hahihokake Creek, is located on the site. Part of Quequacommissacong Creek also is known as Milford Creek.

From 1907 to 1971, the Milford Mill was operated by the Riegel Paper Corporation. It was purchased by Riegel Paper Corporation in 1972, which later became part of the James River Paper Company, Inc. In 1995, the mill was bought by Crown Vantage, which operated it until 2001. In 2001, the mill was bought and operated by Curtis Papers, Inc. During the time the mill was in operation, the facility reported several spills on the property. The New Jersey Department of Environmental Protection (NJDEP) issued several notices of violation to the facility. The notices of violation included unpermitted discharges and improper containers, training, and recordkeeping. The facility also held air permits and New Jersey Pollutant Discharge Elimination System permits, operated a wastewater treatment plant, and utilized numerous USTs. In July 2003, the mill was shut down and, in November 2004, Curtis Paper, Inc. declared bankruptcy.

Threat and Contaminants

The primary contaminant is polychlorinated biphenyls (PCBs). PCBs have been detected in soil located within areas at the facility and in sediment of Quequacommissacong Creek at locations which are used for fishing for human consumption.

Cleanup Approach

The site was proposed for inclusion on the National Priorities List on September 3, 2008 and listed as final on September 23, 2009. The cleanup approach consists of site investigation and evaluation of cleanup options (also known as the Remedial Investigation and Feasibility Study, or RI/FS). Then, EPA will identify cleanup alternatives including its preferred alternative to the public and solicit public comment. The final cleanup decision will be documented in a Record of Decision to be issued by the Agency.

Cleanup Progress

In August 2001, Curtis Papers, Inc. submitted a preliminary assessment report and remedial investigation work plan to the New Jersey Department of Environmental Protection (NJDEP) as part of the state's Industrial Site Recovery Act. The company identified 20 areas of concern at the Curtis Specialty Papers site. In July 2003, Curtis Papers, Inc. shut down

its operations. The facility was closed down and left unsecured. On October 20, 2006, NJDEP and its emergency response contractor began activities that included securing oil and hazardous materials containers, classifying materials for waste disposal, inspecting above ground storage tanks, collecting and stowing empty containers at the former hazardous materials storage area, and transporting and disposing of materials. Approximately two dozen drums and lab packs were removed from the facility.

In May 2007, EPA tasked the EPA Superfund Technical Assessment and Response Team (START) contractor to perform a removal assessment at the Curtis Specialty Papers facility. On May 4, 2007, START mobilized to the facility and met with EPA to conduct a site walk and discuss the upcoming multimedia sampling event. In August 2007, START returned to the Curtis Specialty Papers facility to collect additional soil samples in AOCs and sediment samples from Quequacommissaong Creek. The soil samples collected from the 2007 investigation identified the presence of PCBs in AOCs known to be used for the storage of PCB-containing transformers, waste materials, and other miscellaneous materials. PCBs also were identified in the bank soil of Quequacommissaong Creek and in the sediment of one of the facility's discharge pipes. The presence of PCBs in the bank soil of Quequacommissaong Creek and in one of the discharge pipes to Quequacommissaong Creek indicates PCB contamination from the Curtis Papers facility has migrated to banks of Quequacommissaong Creek through various outfalls from the facility into Quequacommissaong Creek. The locations of the bank soil samples containing PCBs have been documented to be flooded by Quequacommissaong Creek. PCBs were detected in a sediment sample collected from Quequacommissaong Creek downstream of the facility outfalls. The presence of PCBs in areas known to be used for the storage of PCBs, in banks of Quequacommissaong Creek, in the sediment (sludge) of a discharge pipe from the facility, and in the sediment of Quequacommissaong Creek downstream of the facility outfalls, indicates that the Curtis Specialty Papers site has released PCBs to Quequacommissaong Creek.

In June 2009, EPA executed a Settlement Agreement and Administrative Order on Consent with Georgia-Pacific Consumer Products and International Paper for performance of the Remedial Investigation/Feasibility Study (RI/FS). Under the June 2009 Administrative Order, the two companies have improved security surveillance, installed lighting and fencing to discourage trespassers, and removed oil-containing transformers/capacitors and some presumed asbestos-containing material from the Site. The RI/FS work is underway.

Site Repositories

USEPA Records Center 290 Broadway, 18th floor New York, NY 10007 (212) 637-4308

Milford Public Library 40 Frenchtown Road Milford, NJ 08848 (908) 995-4072



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New Jersey Ecological Services Field Office
927 NORTH MAIN STREET, BUILDING D
PLEASANTVILLE, NJ 8232

PHONE: (609)646-9310 FAX: (609)646-0352

URL: www.fws.gov/northeast/njfieldoffice/Endangered/consultation.html

Consultation Tracking Number: 05E2NJ00-2014-SLI-0281

April 15, 2014

Project Name: Curtis Specialty Papers Superfund Site

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species that may occur in your proposed action area and/or may be affected by your proposed project. This species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under Section 7(c) of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*)

If the enclosed list indicates that any listed species may be present in your action area, please visit the New Jersey Field Office consultation web page as the next step in evaluating potential project impacts: <http://www.fws.gov/northeast/njfieldoffice/Endangered/consultation.html>

On the New Jersey Field Office consultation web page you will find:

- habitat descriptions, survey protocols, and recommended best management practices for listed species;
- recommended procedures for submitting information to this office; and
- links to other Federal and State agencies, the Section 7 Consultation Handbook, the Service's wind energy guidelines, communication tower recommendations, the National Bald Eagle Management Guidelines, and other resources and recommendations for protecting wildlife resources.

The enclosed list may change as new information about listed species becomes available. As per Federal regulations at 50 CFR 402.12(e), the enclosed list is only valid for 90 days. Please return to the ECOS-IPaC website at regular intervals during project planning and implementation to obtain an updated species list. When using ECOS-IPaC, be careful about drawing the boundary of your Project Location. Remember that your action area under the ESA is not limited to just the footprint of the project. The action area also includes all areas that may

be indirectly affected through impacts such as noise, visual disturbance, erosion, sedimentation, hydrologic change, chemical exposure, reduced availability or access to food resources, barriers to movement, increased human intrusions or access, and all areas affected by reasonably foreseeable future that would not occur without ("but for") the project that is currently being proposed.

We appreciate your concern for threatened and endangered species. The Service encourages Federal and non-Federal project proponents to consider listed, proposed, and candidate species early in the planning process. Feel free to contact this office if you would like more information or assistance evaluating potential project impacts to federally listed species or other wildlife resources. Please include the Consultation Tracking Number in the header of this letter with any correspondence about your project.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Curtis Specialty Papers Superfund Site

Official Species List

Provided by:

New Jersey Ecological Services Field Office
927 NORTH MAIN STREET, BUILDING D
PLEASANTVILLE, NJ 8232

(609) 646-9310

<http://www.fws.gov/northeast/njfieldoffice/Endangered/consultation.html>

Consultation Tracking Number: 05E2NJ00-2014-SLI-0281

Project Type: Superfund Site Remediation

Project Description: Superfund site currently in the RI/FS stage of the remedial process. Site is located in Milford Borough, NJ.



United States Department of Interior
Fish and Wildlife Service

Project name: Curtis Specialty Papers Superfund Site

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-75.077364 40.5547071, -75.078866 40.5533392, -75.0852604 40.5580002, -75.0862903 40.5572846, -75.0891678 40.5599239, -75.0913608 40.5618149, -75.0909316 40.5620431, -75.092556 40.5633798, -75.0911419 40.5642095, -75.0938434 40.5665096, -75.0927706 40.5671355, -75.0915689 40.5664509, -75.0907535 40.565212, -75.0898523 40.5642992, -75.0892944 40.5634842, -75.0896377 40.5627995, -75.0884361 40.5617236, -75.0873203 40.5624735, -75.0838871 40.5595066, -75.0840587 40.5589849, -75.0804968 40.5559852, -75.0801105 40.5561483, -75.077364 40.5547071)))



United States Department of Interior
Fish and Wildlife Service

Project name: Curtis Specialty Papers Superfund Site

Project Counties: Hunterdon, NJ



United States Department of Interior
Fish and Wildlife Service

Project name: Curtis Specialty Papers Superfund Site

Endangered Species Act Species List

There are a total of 3 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed on the **Has Critical Habitat** lines may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Bog Turtle (*Clemmys muhlenbergii*)

Population: northern

Listing Status: Threatened

Indiana bat (*Myotis sodalis*)

Population: Entire

Listing Status: Endangered

northern long-eared Bat (*Myotis septentrionalis*)

Listing Status: Proposed Endangered



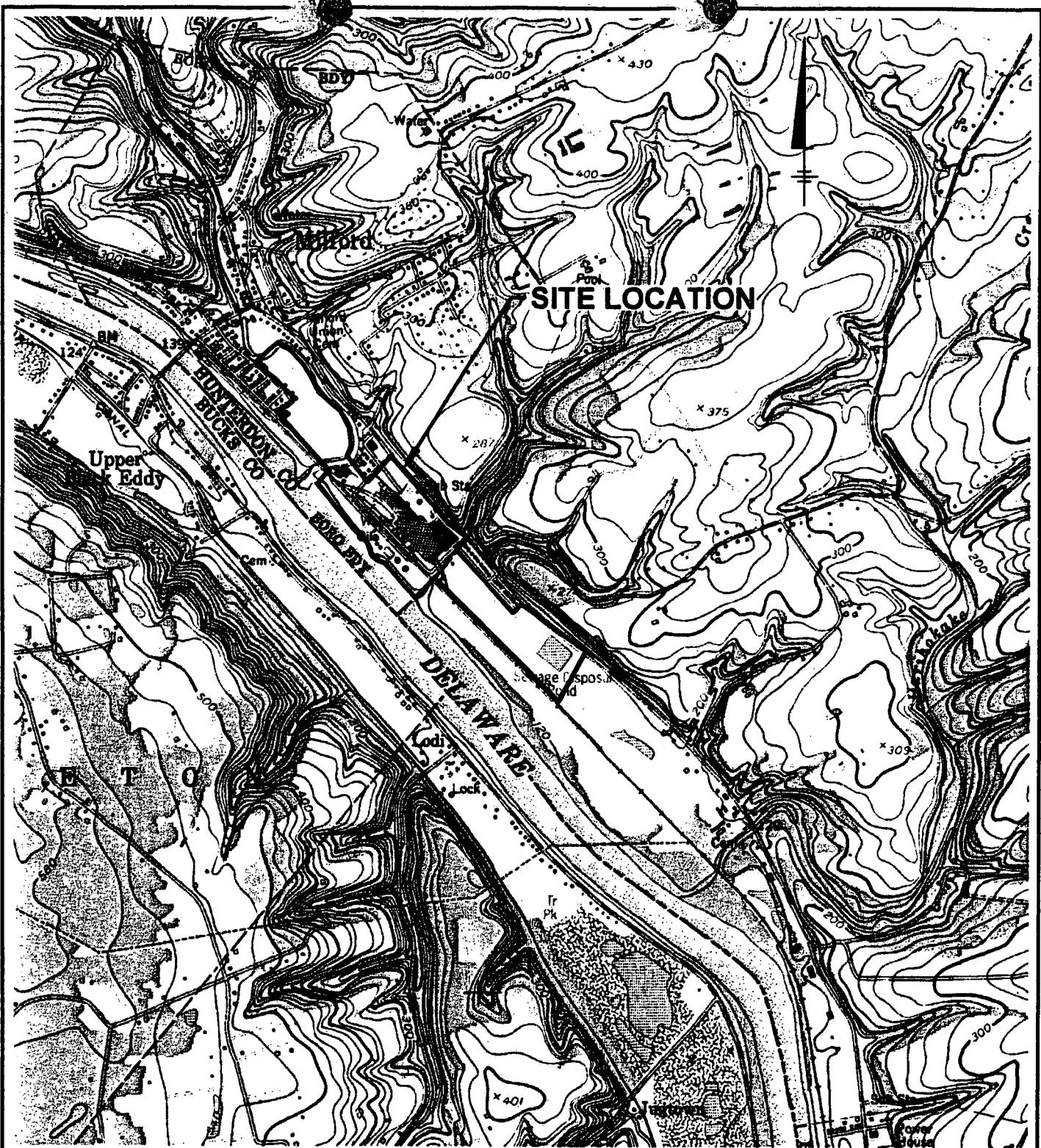
United States Department of Interior
Fish and Wildlife Service

Project name: Curtis Specialty Papers Superfund Site

Critical habitats that lie within your project area

There are no critical habitats within your project area.

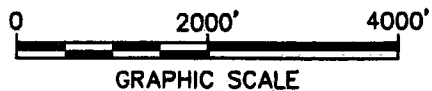
CITY: CRANBURY DIV/GRP: 45 DB: TFAATTO LD: TFAATTO PIC: D.COWAN P#: K.ROMANIE TM: S.LAREW LVR: ON- OFF-REF
G: ENVCAD/CRANBURY/VAC/T/900661280400041/STATECH/MEMO66128041.dwg LAYOUT: 2-1 SAVED: 2/14/2011 1:19 PM ACADVER: 18.05 (LMS TECH) PAGES: 18.05 (LMS TECH) PLOT: FULL CTB PLOTTED: 2/14/2011 1:19 PM BY: FATTO, TRACEY



SOURCE:
USGS QUADRANGLE MAP
FRENCHTOWN, NJ
7.5 MINUTE SERIES, REVISED 1995
CONTOUR INTERVAL 20 FEET



NEW JERSEY



INTERNATIONAL PAPER COMPANY AND
GEORGIA-PACIFIC CONSUMER PRODUCTS, LP
CURTIS SPECIALTY PAPERS SITE
**TECHNICAL MEMORANDUM ON
CANDIDATE TECHNOLOGIES**

SITE LOCATION MAP

 **ARCADIS** | **FIGURE 2-1**