



ROI-24-C-015

Narrative Information Sheet
FY2024 U.S. EPA Brownfield Cleanup Grant Application
Our Katahdin Wastewater Treatment Plant Lagoons
Former Great Northern Paper Company, Millinocket, Maine

1. Applicant Identification: Our Katahdin
245 Aroostook Avenue
Millinocket, Maine 04462
2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested
 - i. Amount Requested: \$5,000,000
3. Location
 - a. City: Millinocket
 - b. County: Penobscot County
 - c. State: Maine
4. Property Information: Wastewater Treatment Plant Lagoons - Former Great Northern Paper Company, 1 Katahdin Avenue, Millinocket, Maine 04462
5. Contacts:
 - a. Project Director: Steve Sanders, Director of Mill Site Redevelopment, Our Katahdin, 245 Aroostook Avenue, Millinocket, Maine 04462; steve@ourkatahdin.com; (207) 447-1788
 - b. Chief Executive/Highest Ranking Official: Sean DeWitt, President, Our Katahdin, 245 Aroostook Avenue, Millinocket, Maine 04462; sean@ourkatahdin.com; (917) 705-4669
6. Population: The cleanup project is located in the Town of Millinocket, which has a population of 4,104 (2020 Census).

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	2
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B. , for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from State DEP Acknowledging Our Katahdin’s Application: Attached

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Target Area and Brownfields

1.a.i Overview of Brownfields Challenges and Description of Target Area

Our Katahdin (OK) is a non-profit organization that serves the Town of Millinocket, a small town with a population of 4,104¹ which is located in the shadow of Mount Katahdin at the terminus of the Appalachian Trail in northern Maine. *The Town of Millinocket contains the 1,400-acre former Great Northern Paper Company (GNP) mill site, which was once the heart and lifeblood of the community.* The blighted, vacant industrial properties throughout our community point to economic decline and potential environmental hazards. As a result, these sprawling Brownfields discourage businesses and residents from relocating to Millinocket, despite the town's proximity to some of the most stunning natural scenery and outdoor recreation opportunities in the northeast.

The GNP Site, the adjacent residential areas, and the Wastewater Treatment Plant (WWTP) Lagoons is the Target Area of this Cleanup Grant Application. Visitors to the once-vibrant Target Area are now confronted with distress, blight, and neglect at the GNP Site. Many of Millinocket's inhabitants, including members of its elderly, low-income, unemployed and disabled sensitive populations, live near the WWTP Lagoons (the Subject Site of this cleanup grant application), located on the eastern portion of the GNP site.

The GNP mill was constructed in 1901 and quickly became the world's largest paper mill. In the 1960s and 1970s, at its peak, the mill employed more than 2,000 people. Global competition and lack of investment led to mill down-sizing and layoffs starting in the 1990s, which was followed by the devastating closure of the GNP mill in 2008. The GNP closure, and the loss of over 2,000 jobs in one small, isolated region devastated the local economy. Unemployment spiked in the wake of the closure, causing massive workforce flight and abandonment of industrial, commercial and residential properties; a significant number of these other properties are now also Brownfields. Since 1980, Millinocket lost more than 45% of its population, partially due to the mill closure². The majority of people who left were technical and skilled laborers, families with young children, or people of child-bearing age. In 2019, 61% of Millinocket's residents were age 45 or older¹. A lack of jobs and opportunities has prevented displaced people from returning to the area, and an outmigration of our young population left behind an aging generation struggling to adapt and reinvent themselves in a dwindling economy. Unemployment in the area remains high at 6.5%² and the median household income in Millinocket (\$32,730) is approximately 60% of the median household income in Maine (\$53,024)². Our community's health is impacted by higher prevalence of asthma and cancer.

1.a.ii. Description of Proposed Brownfield Site(s)

Since its closure, the GNP site has been scrapped and partially demolished, and is a neglected, distressed, 1,400-acre blight in dire need of cleanup. A 2019 Phase I ESA identified 13 Areas of Concern (AOCs) ranging from site-wide AOCs (1,400-acre) to areas encompassing 50-acre portions of the GNP site. OK has been assessing and cleaning up these AOCs to ready the site for redevelopment. Paper slurry/sediment, water, and soil impacted by the Contaminants of Concern (COCs) presented below are being addressed as part of the WWTP Lagoons Cleanup. *The vacant and neglected approximate 27-acre WWTP Lagoons (Subject Site for this Cleanup grant) was utilized to treat paper mill wastewater in the late 1970's and is bordered by Millinocket Stream.* This grant will clean up and remove the WWTP Lagoons and supporting infrastructure (36in aeration piping), cleanup contamination in the sediment/soils to restore this area of the site to productive reuse (proposed recycled aquaculture system {RAS}salmon aquaculture farm) that will be the catalyst for development and generate jobs.

A Phase II ESA and Hazardous Building Materials Inventory (HBMI) of the WWTP and Lagoons was completed as part of Our Katahdin's Site-Specific Brownfields Assessment Grant and identified the following COCs: volatile organic compounds (VOCs), semi-VOCs (SVOCs), extractable petroleum hydrocarbons (EPH), and metals in the paper slurry/sediment/water contained within the lagoons and soils comingled with paper slurry/sediment that have been land spread directly adjacent to the WWTP Lagoons. These COCs exceed applicable State of Maine human health guidelines. The HBMI identified lead-based paint (LBP) and universal wastes in

¹ 2020 American Community Survey. Census.gov

² "Census of Population and Housing". Census.gov

Our Katahdin Wastewater Lagoons—Former Great Northern Paper Company, Millinocket, Maine relic WWTP aeration infrastructure remaining at the site. The WWTP and Lagoons have been abandoned since the mill closed in 2008, and have deteriorated under long winters, leading to increased human exposure to the COCs. If not cleaned up soon, the lagoons and supporting infrastructure will deteriorate to the point where the COCs will be subject to erosion by wind and water and will represent a significant risk to the health of possible visitors, maintenance workers, commercial site tenants and the surrounding community.

1.b Revitalization of the Target Area

1.b.i Reuse Strategy and Alignment with Revitalization Plans

OK was formed to help the Town of Millinocket with reuse and revitalization planning of Brownfields and other vacant and underutilized properties, with the mission of bringing jobs back to the area through investment in Millinocket’s core infrastructure, including sustainable reuse of the WWTP Lagoons and the GNP site. OK acquired and is redeveloping the GNP site into the One Katahdin Fiber Park/One North. OK has developed a “Business and Development Plan” which outlines strategies comparable to Defense Base Closure and Realignment Act (BRAC) Sites, which go through closure and are often turned into industrial parks. OK’s goal for this “Fiber Park” is to provide utility resources to the next generation of wood product, information technology, aquaculture, and manufacturing at industrial scale and competitive rates; the remediation and abatement of the WWTP Lagoons will make way for a new salmon aquaculture farm that will utilize the excavated area of the lagoons to house salmon tanks capitalizing on the Site’s pre-excavated lagoons, proximity to water, rail, affordable hydropower and other industrial infrastructure.

The WWTP Lagoons are not located in a federally protected floodplain; however, OK’s Business and Development Plan incorporates reuse goals which are suitable and appropriate for areas of the Site which are protected (wetlands).

OK also partnered with Innovative Natural Resources (INRS) and participated in their Mill Development Modeling research to identify how the GNP site could be redeveloped into a multi-tenant industrial park, utilizing the sites’ assets in an economically sustainable manner. *OK works/collaborates with Four Directions Development Corp to improve the social and economic conditions of the Native American tribes in Maine. The tribes support this project and we anticipate them benefiting from the jobs created at the Site.*

Millinocket and the nearby towns of East Millinocket and Medway have combined their Comprehensive Plans. This new plan highlights the former GNP Site as a priority area to focus economic development opportunities, and has developed tax incentives, TIFs, and payment in lieu of taxes (PILT) to incentivize redevelopment at the GNP Site. OK and the Town of Millinocket have formed a private-public partnership and created an Economic Redevelopment Committee to provide guidance to the GNP redevelopment and to develop long-term reuse and revitalization goals. The community has been solicited for input and involved in this process (open/public meetings). *Under the Tax Cuts and Jobs Act of 2017, Millinocket was designated as an “Opportunity Zone.”* The Town is also identified as being part of the Pine Tree Development Zone Program, which offers a reduction in taxes if jobs are created. Millinocket has been working hand in hand with OK to redevelop the Site; they have assisted OK in resource development and tenant support. OK’s redevelopment of the WWTP Lagoons is directly in-line with the goals of the Town’s (and Katahdin Region’s) overall comprehensive plans.

1.b.ii Outcomes and Benefits of the Reuse Strategy

Performing environmental cleanup of the WWTP Lagoons will be an important step in a multi-phased process to redevelop the overall GNP Site. The end result will be a self-sustaining industrial campus with 10-15 new businesses and 300-500 new job opportunities. Cleanup of the WWTP Lagoons is a vital step in the overall reuse and revitalization plan for the GNP site. This cleanup will build on prior EPA Cleanup grants and redevelopment planning at the Site and other public and private investments. Reuse for the WWTP Lagoons includes redevelopment of the site as a salmon aquaculture farm that will support development of a 27-acre portion of the site. This proposed development will require the construction of a 400,000 square foot facility to include fish tanks, processing and treatment facilities. *Upon completion of the Site cleanup activities, OK anticipates redevelopment of the WWTP Lagoons to occur immediately with an estimated investment of \$140,000,000 in a new aquaculture facility that will create 80 jobs.*

Remediating this area and taking steps towards overall mill site redevelopment will not displace residents or businesses but will rather have immediate direct and positive impacts to public welfare, health, improve climate adaptation, and the environment; and will stimulate the economy, replace jobs that were lost with the mill closing, expand the tax base, increase property values, reduce blight, improve community morale, incentivize neighborhood investment, and prevent further displacement of residents. Revitalizing the WWTP Lagoons will allow for the reuse of existing sewer, water, with improved stormwater treatment thereby improving local climate adaptation/mitigation, and electric infrastructure as well as reusing a key portion of the site that can be remediated and readapted in a cost-effective manner.

The Millinocket community meets the criteria of the Justice40 Initiative as a disadvantaged community and was designated as a “Opportunity Zone”. It is a population of low income, elderly residents who have been disproportionately impacted by high unemployment, environmental impacts from the mill, and substandard housing. ***This cleanup project and redevelopment will utilize green, hydroelectric and solar power generated in the Target Area at the GNP site as well as access to existing freight rail.*** Wetlands and flood zones do not exist in the vicinity of the WWTP Lagoons, but future development of the GNP site will preserve wetlands located across the site. Reuse of the WWTP Lagoons will be a bellwether that promotes prosperity and further commercial, residential, and industrial revitalization in the Target Area.

1.c Strategy for Leveraging Resources

1.c.i Resources Needed for Site Characterization

In October 2022, OK received a \$350,000 Site Specific Brownfields Assessment Grant for the GNP site as well as a 2022 \$671,000 Congressionally Directed Spending grant. These funds have been utilized to conduct assessments of the WWTP Lagoons and environmental due diligence in support of the salmon aquaculture farm. If needed, the project will utilize some of OK’s remaining Assessment funds, MEDEP 128A funds, or Eastern Maine Development Corporation Assessment funds who are supportive of this project.

1.c.ii Resources Needed for Site Remediation

OK has created a public/private partnership to complete this cleanup estimated to be \$13,125,000. Additional funding for remediation activities is needed, as a nonprofit, OK will be eligible for funding through the Maine Department of Environmental Protection and the Maine Department of Economic and Community Development’s (DECD) Brownfields Grant Programs (refer to MEDEP letter of support). Katahdin Salmon the proposed aquaculture developer of the Lagoons has agreed to fund up to \$5,000,000 of the cleanup and is in the process of raising private capital to initiate their project construction (refer to letter of support). To date DECD has committed over \$2,000,000 in grant/loan for projects at the GNP site and is committed to provide funding for the lagoons cleanup project. In August 2023, OK was awarded a \$750,000 Catalyst Grant from Northern Borders Regional Commission to repurpose the site and ready it for Katahdin Salmon’s development. Eastern Maine Development Corporation also has an RLF with good potential of making substantial contribution (\$1M or more). **Without EPA’s \$5M grant this project will not happen.** OK is confident that with EPA’s \$5M, Katahdin Salmon’s \$5M we can raise the remaining funding some of which is in hand, to complete the project.

In October 2020, OK received a \$350,000 EPA Site Specific Assessment Grants for the GNP site, a \$500,000 Cleanup Grant for the former GNP Administration Building, and in 2021 a \$500,000 Cleanup Grant for the GNP Research Building. In October 2022, OK received a \$500,000 Cleanup Grant for the former GNP Engineering Building. In October of 2023, OK received a \$1.5M Cleanup Grant for the former No. 6 Fuel Oil Tank Farm and Rail Corridor on the GNP site. These grants along with other private funds and the potential of this \$5M grant will put us at completion readying the site for redevelopment.

1.c.iii Resources Needed for Site Reuse

In September 2018, OK received a \$5.3M federal grant from the U.S. Economic Development Agency (EDA) to remediate/build infrastructure at the GNP Site. Additionally, OK has *already received* a \$450,000 loan from Millinocket, a \$259,446 grant from the Maine Rural Development Authority, and a \$200,000 grant from the Northern Border Regional Commission. OK also has firm leveraging commitments from the following: \$10,000 grant funding from the Maine Community Foundation to support the engineering and planning of the Millinocket industrial site; \$114,774 from the Elmina B. Sewall Foundation via sub-grant from the Nature

Our Katahdin Wastewater Lagoons—Former Great Northern Paper Company, Millinocket, Maine Conservancy for community outreach and engagement; and \$150,000 in federal grant funding from the Northern Borders Regional Commission for fiber optic broadband infrastructure. Documentation for these funding sources is included in *Attachment A*. This money has been earmarked for infrastructure, utility, and telecommunication improvements which are necessary to attract and secure tenants. ***The leveraged funds described above will support the redevelopment of the WWTP Lagoons but until the VOCs, SVOCs, EPH, and metals in paper slurry/sediment/water/soil are addressed, no redevelopment or improvements can occur.***

OK is engaged with a development team (Katahdin Salmon) focused on reusing the WWTP Lagoons, as well as other portions of the GNP site. As provided above, Katahdin Salmon is underway with their capital raise to fund their portion of this cleanup project as well as their construction of the site. OK has been applying and will continue to apply for grants and foundation funding to assist development efforts at the GNP Site.

1.c.iv Use of Existing Infrastructure

The Target Area maintains significant infrastructure which can be reused and revitalized as a cost savings to the overall redevelopment project. Electricity: Hydroelectric and solar power is generated in the Target Area that has 3 substations, 2 transmission right of ways, and transformers. Water: The Site has two large intakes for process water which will allow OK to provide competitively priced water to new development. Wastewater: The Target Area is located in close proximity to the municipal wastewater treatment plant which will allow OK to provide competitively priced wastewater treatment to the new development. Rail: The Target Area the Site are located in close proximity of freight rail which will be a significant asset to the project once redeveloped by Katahdin Salmon. Data: The Site has direct access to high-speed broadband. *No other key infrastructure needs are anticipated for the redevelopment of the site.*

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i The Community's Need for Funding

Due to the small population of the Target Area (4,104¹) and existence of economically impoverished sensitive populations, OK cannot provide direct funding to this project. When GNP began down-sizing and eventually closed its doors, over 2,000 people lost their jobs and unemployment rates spiked. Technical, good-paying jobs have not returned to the region, and unemployment in the Katahdin Region remains high at 6.5% (Maine unemployment rate is 5.3% and USA is 3.6%³). The Millinocket school budget has been cut by \$1.7 million in the last 4 years as the enrollment has declined from 655 in 2007 to 500 and continues to drop.^{4,5} *According to the 2017 American Community Survey, no new homes have been built since 2010.*

The median household income in Millinocket is \$32,730, approximately 60% of the current state of Maine median household income (\$53,024)³. The closure of the paper mill resulted in a further loss of more than \$2 million in municipal taxes. The economic hardships resulting from the mill closure continue, and Millinocket's 2016 valuation, \$176 million, represents a decrease of about \$35 million from the previous year. This devaluation was caused in part by the demolition of buildings at the GNP site. The town also lost \$32.5 million in personal property valuation with the removal of equipment from the GNP mill site⁶. These economic hardships have made it impossible for the Town to fund environmental and cleanup projects, or to address the blight and vacant downtown buildings using municipal funds. Because the Town is unable to fund environmental cleanup/assessment activities, responsibility falls on individuals, business owners, and non-profit groups. OK has taken the monumental task of redeveloping the 1,400-acre GNP Site; which will only be possible through assistance from governmental and non-governmental agencies. This Brownfield grant is crucial to the reuse of the WWTP Lagoons, as the environmental cleanup is the impetus for area reinvestment and development, job creation, and an increase in the Town's tax base, and will serve to protect the health and welfare of our most sensitive citizens.

2.a.ii Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

³ 2020 American Community Survey. Census.gov.

⁴ <https://www.pressherald.com/2014/08/17/how-much-further-can-millinocket-fall/>

⁵ <https://www.publicschoolreview.com/maine/millinocket-public-schools/2308280-school-district>

⁶ <https://bangordailynews.com/2015/09/03/news/penobscot/millinocket-property-tax-rate-rises-as-valuation-plummets/>

High unemployment rates have caused migration of young adults, professionals, and talented laborers who are forced to move elsewhere to find jobs. Since 1970, Millinocket has lost more than 45% of its population (the majority of which are younger individuals), leaving 61% of its current residents as being age 45 or older. In Millinocket, the median age is 54.2 with people over 65 making up almost 30% of the population and placing it in the 93rd percentile nationally⁷. The older population requires increasingly high service costs and provides the Town with a diminishing tax base. *This is compounded by the fact that 25.6% of the population is affected by a disability (compared to 15.9% in Maine); and 41.3% of the elderly population over 65 is affected by a disability (2017 American Community Survey).* Our low income, unemployed, disabled adult population with less than a high school education is also disproportionately high (~75th percentile in the region and <60th percentile nationally⁷) and the elderly are our sensitive populations which are disproportionately impacted by hazardous building materials (asbestos and lead paint) which are present in homes, buildings and infrastructure in the Target Area. These environmental issues, combined with the overall disinvestment and blight that plagues the Target Area, have impacted the health of low-income families and the disabled, elderly individuals that live in the Target Area, and that are limited in their choices for housing options, lacking the funds to move or conduct necessary renovations to keep them safe. Low-income residents in particular, pay a disproportionate share of their income toward healthcare. Adding environmental contaminants to their healthcare concerns is overly burdensome to one of the Town’s most sensitive populations.

This cleanup project is an important step in the reuse and redevelopment of the WWTP Lagoons and GNP site, and the revitalization of the Target Area. This sort of project will create community pride, investment, and good-paying jobs (both at the Site, and through economic development of support businesses). Reinvestment in the community will lead to improvements to infrastructure, the housing stock, and downtown area, ultimately improving the health and welfare of those sensitive populations who live and work in the Target Area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Petroleum constituents and metals are prevalent inside the WWTP Lagoons and are also widespread throughout the Target Area. Petroleum constituents and metals contribute to respiratory ailments such as *asthma and lung cancer*. According to the Maine CDC, 12.8% of adults in this region suffer from asthma compared to 8.9% nationwide. Asthma Emergency Department Visits for Millinocket had 111 per 10,000, ranking 20th out of 721 towns and cities in the state (Maine Tracking Network). Poor air quality in the Target Area is compounded by large quantities of particulates, nitrogen dioxide, sulfur dioxide, and carbon monoxide which were historically emitted from the GNP smoke stacks during paper manufacturing⁸. Maine also continues to have the highest age-adjusted cancer incidence and mortality rates in the U.S. The Maine CDC estimates the rate of cancer incidences in Penobscot County is 537 incidences per 100,000 people, which is 15% higher than the cancer rate nationwide (469 incidences per 100,000 people). The proposed cleanup of the WWTP Lagoons will reduce these health treats to our community by removing petroleum and metals from the soil/sediment and lead, from lagoon infrastructure that are additional risk factors for these conditions. The projected reuse (paper slurry and sediment consolidation) will reduce respiratory threats posed to our Target Area.

(3) Promoting Environmental Justice

(a) Identification of Environmental Justice Issues: Census Tract 300 where Millinocket is located is identified as disadvantaged according to CJEST. Brownfields have created environmental justice issues which have resulted from past industrial and governmental operating policies which caused a cycle of disinvestment and poverty. In addition to environmental hazards, the EJ Index for Hazardous Waste and RMP proximity is at the 89th percentile compared to state and over the 50th percent nationwide and several EJ indicators related to air emissions exceed the 60th percentile in the region⁷. The median household income in Millinocket is \$32,730, approximately 60% of that in the State of Maine (\$53,024), and 10.1% of the population lives in poverty⁹. Options for former mill workers are sparse, and because the average age of workers is nearly 60,

⁷ EJSCREEN

⁸ U.S. EPA National Emissions Inventory. EPA.gov

⁹ 2019 American Community Survey. Census. gov

Our Katahdin Wastewater Lagoons–Former Great Northern Paper Company, Millinocket, Maine

for many, going back to school or retraining is not realistic. The Target Area is left with relatively no job opportunity, poor access to health care, no public transportation, and a diminished population. These impacts have disproportionately impacted low-income families and aging populations and created a significant environmental justice issue.

Our underserved community live in substandard housing, characterized by hazardous building materials such as lead paint and asbestos. The Target Area has some of the oldest housing stock in the United States. In the USA, 41% of occupied housing was constructed before 1970 (when lead paint was still widely used); in Millinocket, that number skyrockets (lead paint indicator 74 percentile nationally). *This means 3 of 4 individuals in Millinocket, many of whom are elderly, disabled, and low-income, are living in homes which may be contaminated with lead and asbestos and poor indoor air quality, which may contribute to asthma and cancer rates.*

According to EPA’s EJSCREENTool and EnviroAtlas, our Target Area has an aging population over age 64 in the 95-100th percentile, 95-100th percentile have less than a high school education, and the lead paint indicators are in the 90-95th percentile when compared to the State and the US.

(b) Advancing Environmental Justice: The Target Area’s revitalization, spurred by Brownfield assessment, cleanup, and redevelopment, will bring jobs and people back to the Katahdin region, spurring economic development and improvement of health care services, opportunities, and amenities. These services will benefit individuals and businesses who were impacted, displaced, and marginalized by the historic mill closure. This cleanup will alleviate the disproportionate impacts of environmental pollution left behind by legacy contamination of the mill.

2.b Community Engagement

2.b.i Project Involvement & 2.b.ii Project Roles

OK and Millinocket have formed a private-public partnership and created an Economic Redevelopment Committee to support the WWTP Lagoons cleanup and redevelopment of the GNP site. The Town has also provided support through participation in community outreach (and use of Town Office for public meetings) and use of Town resources (public works, police department, facilities). The following community partners/stakeholders will provide meaningful support and guidance with respect to the cleanup planning for the site:

Partner Name	Point of Contact	Specific Role in the Project
Katahdin Area Chamber of Commerce	Katy Patten members@katahdinmaine.com 207-723-4443	This business entity has more than 100 members and will provide support with future grant applications, attending meetings, visioning, marketing, and be part of the BCAC.
The Nature Conservancy	Bill Patterson wpatterson@tnc.org 207-607-4819	TNC will provide grants, will help convene community-based organizations, and will deliver in-kind/cash support.
Eastern Maine Development Corporation	Lee Umphrey lumphrey@emdc.org 207-942-6389	EMDC will be part of the BCAC and has managed Brownfields Grants and will assist with outreach and may provide funding from their Brownfields programs.
Penobscot Indian Nation	Michael Burgess, J.D. mburgess@penobscotnation.org 207--881-3333	The Penobscot Indian Nation supports the aquaculture project and will provide input on the cleanup of the Site. Their tribal lands are located close to the site.

2.b.iii Incorporating Community Input

OK is built on community engagement; having hosted extensive community outreach efforts to date, with resolute focus to continue these efforts as part of subsequent phases of work at the Site. OK will implement an aggressive, multipronged plan for involving the target community and stakeholders in the planning and implementation of this project, as well as soliciting input (public meetings/questionnaires), and responding to questions/concerns in a meaningful way (in public meetings/text/website posts). The local community, project partners, and residents will be encouraged to provide feedback through social media outlets, via OK and Town websites, and in person at public meetings at the OK office (located in downtown Millinocket). This community engagement platform will be utilized to mobilize volunteers to support this project, solicit feedback, and support the cleanup/reuse of the WWTP Lagoons.

Project updates will be publicized in local and state-wide newspapers, on the Town’s website, and on OK’s website and social media outlets. OK will create informational flyers,

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handouts, and project summary documentation, and will distribute paper versions of these documents in key locations throughout town to include our sensitive populations (elderly and low-income individuals) who may not have internet access. Hard copies of project documents and reports will be available at the Town office and OK office for review. Public meetings will be handicapped accessible. OK will also accommodate those who speak languages other than English and/or may have hearing/reading impairments (such as the elderly and the disabled), by translating documents, providing translators, and providing access to videotelephony and online chat services through a cloud-based, software platform (e.g. video communications) as a means for community engagement and teleconferencing.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a Proposed Cleanup Plan

The 27-acre lagoon footprint includes a 5-acre settling lagoon and 22-acres of aeration lagoons. The entire 27-acre lagoon system is surrounded by an earthen berm. The cleanup plan is to remove paper slurry/sediment from the 5-acre settling lagoon, dewater it, place it back into the 5-acre lagoon and then remove paper slurry/sediment from the 22-acre aeration lagoon and place it and dewater it in the 5-acre settling lagoon. Engineering volume estimates suggest that the project will relocate and consolidate 225,000 cubic yards of material. Cleanup contractor means and methods will likely include the use of chemical and physical stabilization, such as adding cementitious amendments to the slurry/sediment to prevent leaching and/or improve its geotechnical properties such that these materials do not become physical hazards and the 5-acre settling lagoon has reuse potential (solar array). Lead-based paint (infrastructure components 36-inch aeration piping) will be removed from the Site. Impacted paper slurry/sediment/soil will be removed from the lagoons, consolidated and covered in accordance with MEDEP guidelines to allow for site reuse. Cleanup will be conducted utilizing standard techniques. U.S EPA and MEDEP have reviewed all reports/supporting documentation and have approved the Recommended Cleanup Alternative.

3.b Description of Tasks/Activities and Outputs

3.b.i Project Implementation, 3.b.ii Anticipated Project Schedule, 3.b.iii Task/Activity Lead, & 3.b.iv Outputs

Task/Activity 1: Cooperative Agreement Oversight	
i.	Project Implementation
•	EPA-funded activities: OK will perform program development, organization, and support in accordance with the terms & conditions of the Cooperative Agreement, and will continue to work with our Brownfields Cleanup Advisory Committee (BCAC) that was created during OK’s prior Brownfield Cleanup Programs. The BCAC includes members of OK, the QEP, MEDEP, EPA, and citizen/project stakeholders. Based on a competitive bid process (per 40 CFR 30), OK will develop a Request for Proposals, hold interviews, and select a QEP. One staff person will attend two National Brownfields Conferences. Quarterly reports and MBE/WBE reporting will be completed. ACRES will be maintained and updated.
•	Non-EPA grant resources needed to carry out task/activity: None
ii.	Anticipated Project Schedule: We anticipate the BCAC meetings will be held at regular intervals throughout the project. We anticipate a QEP will be selected within 1-2 months of funding. Quarterly and MBE/WBE reports will be submitted and ACRES will be updated throughout the grant period.
iii.	Task/Activity Lead(s): OK will oversee this task, with assistance from BCAC & QEP.
iv.	Outputs: A QEP will be selected; OK and the QEP will facilitate/attend up to three meetings with the BCAC; 12 quarterly reports will be prepared; MBE/WBE reporting will be conducted as needed; ACRES will be updated as needed.
Task/Activity 2: Community Outreach & Engagement	

<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities: The QEP will prepare a Community Involvement Plan for approval by the MEDEP and EPA. OK and the QEP will develop marketing materials; notify community members, adjacent landowners, and community organizations of cleanup schedules; advertise for public meeting through online and in-person methods; hold two public meetings to solicit input, educate, and update the community; and prepare public outreach materials. OK will provide outreach and communication to the public prior to undertaking the cleanup/abatement efforts, during remediation, and following remediation. We will have a public notification on the ABCA with public review/comment of the final. • Non-EPA grant resources needed to carry out task/activity: Community partners will help advertise public meetings and solicit public input. Meetings may be held at the Millinocket Town Office or video conferencing.
<p>ii. Anticipated Project Schedule: Community input will occur for the duration of the grant; the 1st public meeting will occur after the QEP has completed draft versions of the cleanup plans/specifications and the 2nd will be held as cleanup nears completion.</p>
<p>iii. Task/Activity Lead(s): OK will oversee this task, with assistance from BCAC/QEP/partners.</p>
<p>iv. Outputs: A Community Involvement Plan, outreach and educational materials (Brownfield 101 tri-fold brochure & FAQ handout), public meeting advertisements, press releases and project update reports, educational materials to support a public meeting (presentations & handouts). Notification, review, and implement comments on the final ABCA. At least two public meetings. One-on-one meetings with Site abutters, as needed.</p>
<p>Task/Activity 3: Site-Specific/Site Cleanup Activities</p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities: Prior to start of construction, the QEP with OK will: prepare final cleanup/ abatement plans and specifications for review and approval by the EPA, MEDEP and OK; conduct a pre-bid site visit with contractors; and prepare a SSQAPP for confirmatory sampling. OK/QEP will review contractor bids and select a cleanup contractor. OK will be in communication with MEDEP and EPA throughout this phase of work. The selected cleanup contractor will perform remediation/abatement of hazardous materials onsite in accordance with state and federal regulations. MEDEP VRAP will issue a certificate of completion upon submission of a closure report. • Non-EPA grant resources needed to carry out task/activity: None
<p>ii. Anticipated Project Schedule: The QEP will prepare project documents and cleanup design within 3-6 months of selection (winter 2025). We plan to start remediation/abatement/cleanup work in the summer/fall of 2025 and will complete all work within the grant period.</p>
<p>iii. Task/Activity Lead(s): The QEP will oversee this task, with assistance from OK.</p>
<p>iv. Outputs: Cleanup/Abatement Plans & Specifications, bidding documents, SSQAPP. Abatement & cleanup of the WWTP Lagoons in accordance with ABCA.</p>
<p>Task/Activity 4: Oversee Site Cleanup</p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities: During cleanup/abatement activities (estimated duration 6-8 months with full time construction observation), the QEP will perform the following tasks: monitoring and oversight of construction; project reporting to ensure compliance with the plans, specifications, and requirements for regulatory closure; reviewing and approving pay requisitions and DBE/MBE documentation; final site walk-through to issue project completion; and collection of confirmatory samples as necessary. The QEP will also prepare a MEDEP VRAP closure report for approval by the EPA and MEDEP, will prepare necessary regulatory paperwork to obtain a VRAP Certificate of Closure, and grant closeout documentation. OK will assist with project oversight and will be in communication with MEDEP and EPA team members throughout this phase of work.

•	Non-EPA grant resources needed to carry out task/activity: None
ii.	Anticipated Project Schedule: We plan to start cleanup activities in summer 2025 and will prepare closure reports and documentation in spring 2026. We see no impediment to completing this work within the three-year grant period.
iii.	Task/Activity Lead(s): The QEP will oversee this task, with assistance from OK.
iv.	Outputs: Air clearance documentation, MEDEP VRAP Closure Report, VRAP Certificate of Closure, Grant Closeout documentation.

3.c Cost Estimates

Budget Categories		Project Tasks (\$)				
		CA Oversight	Community Outreach	Site Specific	Oversee Cleanup	Total
Direct Costs	Personnel	\$15,000	\$15,000	\$25,000	\$50,000	\$105,000
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$5,500	\$0	\$0	\$0	\$5,500
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$500	\$0	\$1,000	\$1,500
	Contractual	\$4,500	\$10,000	\$125,000	\$200,000	\$339,500
	Construction			\$4,548,500		\$4,548,500
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$25,000	\$25,500	\$4,698,500	\$251,000	\$5,000,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$25,000	\$25,500	\$4,698,500	\$251,000	\$5,000,000
Cost Share		\$0	\$0	\$0	\$0	\$0
Total Budget		\$25,000	\$25,500	\$4,698,500	\$251,000	\$5,000,000

Task 1 - Cooperative Agreement Oversight: This task includes OK’s time for program development, organization, and support (220 hours @ \$50/hour = \$11,000); up to three meetings with the BCAC (60 hours @ \$50/hour = \$3,000); preparing bidding documents for QEP selection and interviewing/contracting with the QEP (20 hours @ \$50/hour = \$1,000); and for travel to the National Brownfields Conference for one staff – two conferences (\$5,500 air/bus fare, lodging, and registration). QEP time associated with this task is estimated at \$4,500, which includes attendance at three BCAC meetings and programmatic support.

Task 2 - Community Outreach and Engagement: Costs under this task include OK staff (300 hours at \$50/hour = \$15,000) and QEP personnel time (estimated at \$10,000) to attend meetings, prepare presentations and materials, and respond to follow-up questions and comments solicited from the community. Outputs include up to two public meetings and preparation of public outreach deliverables (\$500 in supplies, advertising, production of flyers, etc.) to provide status and outcomes.

Task 3 - Site Specific Activities: OK’s outputs for this task include review of QEP documents and work plans, and communication with the MEDEP and EPA (500 hours at \$50/hour = \$25,000). Total QEP costs are estimated at \$125,000; outputs include Cleanup/Abatement Plans and Specifications (\$97,000), bidding documentation/bidding phase services (\$10,000), SSQAPP (\$10,500), coordination/communication with the MEDEP and EPA (\$7,500). Construction/contractual estimates were provided by professionals with national experience and include paper slurry/sediment excavation, stabilization, consolidation, and cover at the 27-acre site estimated at 225,000 cubic yards of material (\$4,698,500). Total abatement/cleanup costs to be funded through this grant are estimated to be \$5,000,000; contractor outputs including QEP costs, petroleum/metals remediation (soil), and removal/disposal of lead-based paint.

Task 4 - Oversee Site Cleanup: Includes OK time for oversight during cleanup/abatement activities (1,000 hours at \$50/hour = \$50,000) and supplies (\$1,000, advertising for public meetings, production of presentation materials). QEP outputs will include overseeing construction, cleanup,

Our Katahdin Wastewater Lagoons–Former Great Northern Paper Company, Millinocket, Maine abatement activities and coordination with MEDEP (\$200,000), to include: collection and laboratory analysis of confirmatory samples (\$25,000), a VRAP closure report (\$10,000), grant closeout documentation and reporting (\$7,000), presenting at public meetings and BCAC meetings (\$9,000).

3.d Plan to Measure and Evaluate Environmental Progress and Results

OK will track and evaluate progress through high quality, detailed quarterly reports outlining the project’s progress in achieving outputs in accordance with the workplan; and through frequent updating of the ACRES database (tasks complete/money spent/progress). OK will be in regular communication with the QEP, MEDEP and EPA through BCAC Meetings, cleanup meetings, and telephone calls to ensure the project stays on schedule, on budget, and there are no impediments in achieving the project outputs identified above in a timely manner.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

4.a.i Organizational Structure & 4.a.ii Description of Key Staff

OK consists of industry experts with experience executing large scale projects, community engagement, marketing and social media, construction and contract management, risk management, cost control and environmental stewardship. This Brownfield Cleanup project will be completed in a timely, cost-efficient, and effective manner.

Steve Sanders, Director of Mill Site Redevelopment, is our Project Director and will have direct oversight of the management of this program. Mr. Sanders obtained a Bachelor of Science in Physics from Boston College in 1993. He is responsible for leading OK’s Brownfields Cleanup Grants as well as their FY2022 Site Specific Brownfields Assessment Grant. Mr. Sanders will be assisted by **Michele McInnis**. Ms. McInnis leads OK’s Administration and Coordination. She will be in contact with the public and Target Area neighbors and will be instrumental in the public outreach/education portions of the process. OK’s President and Board Member **Sean DeWitt** who currently works as a Director at the World Resources Institute will assist with the project. Sean holds a BSc in engineering from Purdue University and an MSc in Development Finance from the University of London and graduated from Stearns High School in Millinocket in 1993. Sean managed over \$6 million in federal and non-federal loans as part of the GNP redevelopment.

4.a.iii Acquiring Additional Resources

OK will manage a competitive QEP procurement selection process in accordance with 40 CFR 30 through a Request for Proposals to solicit responses from qualified firms for oversight and engineering of the cleanup activities and to assist with community outreach and regulatory compliance. The project will be publicly bid and advertised via the newspaper, OK’s website, and the Town of Millinocket’s website. Cleanup contractors will be selected via a competitive bid process advertised in the same manner. OK will also seek the advice and support of the EPA and MEDEP staff for direction on programmatic requirements. OK and its selected QEP will liaison with the MEDEP to coordinate and oversee the completion of this cleanup. OK has routinely performed this type of procurement for cleanup and development projects. OK promotes strong labor practices, local hiring/procurement, and will link members of the community to potential employment opportunities for the cleanup and redevelopment related to the proposed project in a meaningful and equitable way.

4.b Past Performance and Accomplishments

4. b. i Currently Has or Previously Received an EPA Brownfields Grant

(1) Purpose and Accomplishments - OK received, managed, and closed out a \$200,000 FY2017 EPA Brownfield Cleanup grant for the 10,000+ square foot building located at 230 Penobscot Avenue in downtown Millinocket. This cleanup resulted in redevelopment interest and a proposed reuse to subdivide the building into co-working space. OK is in the process of completing/closing a \$500,000 FY2020 Cleanup grant for Administration Building, we are currently working on a \$500,000 FY2021 Cleanup of the Research Building which includes removal and abatement of asbestos, lead-based paint, and universal/hazardous waste. Accomplishments are shown in ACRES and represent an estimated 10-acres of cleanup at the completion of these grants.

(2) Compliance with Grant Requirements - OK has always submitted quarterly reports and ACRES updates on time and in accordance with all submittal requirements. All annual financial statements have been properly submitted. No submittal or tracking issues have been identified for any Brownfields cooperative agreements. Our Brownfield programs are being completed in accordance with our approved work plans, schedules and terms & conditions with no corrective actions issued. All funds will be utilized during their periods of performance.

ATTACHMENT B

Threshold Criteria for Cleanup Grants

**Our Katahdin Wastewater Treatment Plant Lagoons
Former Great Northern Paper Company, Millinocket, Maine
FY2024 U.S. EPA Brownfield Cleanup Grant Proposal**

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

III.B. Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

Our Katahdin is a non-profit organization and maintains tax-exempt status under section 501(c)(3) of the Internal Revenue Code and therefore is eligible to apply for Brownfields Cleanup funding from the U.S. Environmental Protection Agency (EPA). Documentation of tax-exempt status is included as *Attachment C* to the Narrative.

2. Previously Awarded Cleanup Grants

Our Katahdin affirms that it has not previously received a U.S. EPA Brownfields Cleanup Grant for the Wastewater Treatment Plant Lagoons (the “Site”).

3. Expenditure of Existing Multipurpose Grant Funds

Our Katahdin affirms that it has not previously received a U.S. EPA Brownfields Multipurpose Grant.

4. Site Ownership

Our Katahdin affirms: that it is the sole owner of the Site that is subject to this U.S. EPA Brownfields Cleanup Grant (the Wastewater Treatment Plant Lagoons at the Former Great Northern Paper [GNP] Company Site, located at 1 Katahdin Avenue in Millinocket, Maine); that the property was obtained prior to October 28, 2020 (obtained via deed conveyance on November 24, 2019); and that Our Katahdin will maintain sole ownership of the property until the grant services are completed and the grant is closed out.

5. Basic Site Information

- a) Site Name: Wastewater Treatment Plant Lagoons - Former Great Northern Paper Company
- b) Site Address: 1 Katahdin Ave., Millinocket, ME 04462
- c) Current Owner of the Site: Our Katahdin, 245 Aroostook Ave., Millinocket, ME 04462

6. Status and History of Contamination at the Site

- a) Type of Contamination: Petroleum and Hazardous Substances (Hazardous is the dominant substance)
- b) Operational History and Current Use(s) of the Site: The Wastewater Treatment Plant Lagoons are a portion of, and located within, the former Great Northern Paper (GNP) Millinocket paper mill complex. The Wastewater Treatment Plant and Lagoons were constructed in the 1970s to treat paper mill wastewater. The Wastewater Treatment Plant and Lagoons were a modern, technologically advanced facility utilized to manage and treat the mills wastewater streams. The bermed Lagoon’s occupy an area of approximately 27-

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

acres including a 5-acre settling lagoon and the 22-acre aeration lagoon. The Wastewater Treatment Plant buildings have been abated and demolished in the spring of 2023.

Environmental Concerns: On November 20, 2019, Ransom Consulting, LLC (Ransom) completed a Phase I Environmental Site Assessment (ESA) for the entire 1,400-acre GNP Millinocket Mill complex (which included the Wastewater Treatment Plant Lagoons) on behalf of Our Katahdin, as part of a Maine Department of Environmental Protection (MEDEP) Brownfields Assessment Grant. This ESA identified numerous Recognized Environmental Conditions at the Site pertaining to potentially impacted soil, groundwater, and sediment contamination; and identified the presence of hazardous building materials in the Wastewater Treatment Plant and ancillary Lagoons aeration piping. In October of 2022, a Phase II ESA was completed by Ransom as part of Our Katahdin’s Site-Specific Brownfields Assessment Grant. The Ransom Phase II identified petroleum constituents and elevated concentrations of metals adjacent to the lagoons.

- c) How the Site Became Contaminated / Nature and Extent of Contamination: The Wastewater Treatment Plant Lagoons treated mill wastewater and areas of the site managed paper sludge at the GNP Millinocket Mill complex. Based on the findings and results of prior environmental investigations and remedial activities, it was possible that surface water and/or paper slurry (i.e., sediment) in the lagoons and clarifier may contain contaminants of concern (COCs) associated with former paper making processes and/or releases of hazardous substances or petroleum products (HSPP) at the former GNP Millinocket Mill. At the time of construction (1970s) asbestos-containing building materials, lead-based paint, and other hazardous building materials were widely used in commercial/industrial buildings. The use of these materials was considered acceptable practice and have been identified in these structures.

7. Brownfields Site Definition

The Site meets the definition of a Brownfield under CERCLA 101 (39) and is eligible for Brownfields Grant funding. Our Katahdin affirms that the Site is:

- (a) Not listed or proposed for listing on the National Priorities List;
- (b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered to by parties under CERCLA; and
- (c) Not subject to the jurisdiction, custody, or control of the United States government.

8. Environmental Assessment Required for Cleanup Grant Applications

On November 20, 2019, Ransom completed a Phase I ESA in accordance with ASTM E1527-13 for the entire 1,400-acre GNP Millinocket Mill complex (which included the Wastewater Treatment Plant and Lagoons) on behalf of Our Katahdin, as part of a MEDEP Brownfields Assessment Grant.

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

A Phase II ESA was completed by Ransom in October of 2022. Wastewater Treatment Plant Lagoons and adjacent sample laboratory analytical results of paper slurry/sediment/soil/water samples were collected during the Phase II ESA, in the Wastewater Treatment Plant Lagoons and adjacent area contain detectable concentrations of various Contaminants of Concern (COCs), including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), extractable petroleum hydrocarbons (EPH) fractions, and metals. The detected concentrations of arsenic, hexavalent chromium, and one SVOC (2,4-dinitrophenol) in some paper slurry/sediment samples exceeded their respective “Leaching to Groundwater” Remedial Action Guidelines (RAGs), which are applicable guidelines for evaluating the potential for elements or compounds to migrate from soil/sediment into groundwater. However, hexavalent chromium and 2,4-dinitrophenol were not detected in any of the surface water samples collected from the lagoons and the concentrations of arsenic detected in the paper slurry/sediment samples did not exceed its Undeveloped Background RAG for Maine.

Based on laboratory analytical results for surface water samples collected during the Phase II ESA, surface water present in the WWTP lagoons contains detectable concentrations of SVOCs, PFAS and metals. One SVOC [benzo(a)anthracene] was detected in surface water at concentrations above its Maine Chapter 584 Surface Water Criteria for organism consumption. Remaining COCs were below both the MEDEP Surface Water Criteria and National Recommended Water Quality Criteria - Aquatic Life, which is the applicable criteria for evaluating potential decanting options for surface water in the clarifier and lagoons into an adjacent surface water body to the Site (e.g., Millinocket Stream). Metals were the only contaminant of concern detected in the bedrock groundwater sample at concentrations above their respective laboratory detection limits.

9. Site Characterization

A copy of a letter from MEDEP Bureau of Remediation and Waste Management is included as an *Attachment to the Narrative Information Sheet*, which i) affirms the site is eligible to be enrolled in MEDEP’s Voluntary Response Action Program (VRAP); ii) the site is not currently enrolled, but intends to be enrolled in MEDEP’s VRAP; and iii) a sufficient level of site characterization from the environmental assessments performed to date has been completed for the remediation work to begin on the site.

10. Enforcement or Other Actions

Our Katahdin affirms that there are no ongoing or anticipated environmental enforcement actions, other actions, orders, or local, state, or federal inquiries for the Site. Furthermore, Our Katahdin affirms that they are not aware of any current records of judgments, liens, or other enforcement actions regarding the Site.

11. Sites Requiring a Property-Specific Determination

Our Katahdin affirms that a property-specific eligibility determination is not required for the Site.

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The Site is contaminated with petroleum and hazardous substances (dominant), as such, Our Katahdin is responding to all items under Section (a).

a. Property Ownership Eligibility – Hazardous Substance Sites

- i. EXEMPTIONS TO CERCLA LIABILITY – N/A**
- ii. PROPERTY IS PUBLICLY OWNED AND WAS ACQUIRED PRIOR TO JANUARY 11, 2002 – N/A**
- iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**

(1) Bona Fide Prospective Purchaser (BFPP) Liability Protection

(a) Information on the Property Acquisition

- (i) How you acquired ownership**: Our Katahdin acquired the property via deed conveyance from GNP West Inc.
- (ii) Date you acquired the property**: November 24, 2019
- (iii) Nature of Ownership**: Fee Simple Title
- (iv) Name and identity of the party from whom you acquired ownership**: GNP West Inc., a Delaware C-corporation that was acquired by Our Katahdin in January 2017 from the former owner, Cate Street Capital.
- (v) Familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators**: Our Katahdin is the sole shareholder in the former deed holder, GNP West Inc. Our Katahdin has no familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators of GNP West Inc.

(b) Pre-Purchase Inquiry

- (i) Site assessments performed – Type of assessment, date of assessment, and the entity for which they were performed**: Ransom prepared a Phase I ESA on behalf of Our Katahdin and MEDEP for the entire 1,400-acre GNP Millinocket Mill complex (which includes the Wastewater Treatment Plant Lagoons) on November 20, 2019. The Ransom Phase I ESAs were performed in accordance with ASTM E1527-13, Standard Practice for Environmental Site Assessments, and the Standards for Conducting All Appropriate Inquiry (AAI) under the United States Code of Federal Regulations (CFR), Title 40, Part 312. Ransom completed a Phase II ESA on behalf of Our Katahdin at the Wastewater Treatment Plant Lagoons on October 20, 2022.
- (ii) Qualifications of firm performing assessments**: Ransom is an engineering and consulting firm located in Portland, Maine, with over 30 years of professional experience conducting U.S. EPA and privately-funded Brownfields

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

Assessments. In the past 15 years, the Ransom team has worked successfully on nearly 200 U.S. EPA-funded Brownfield sites in New England.

(iii) Ransom’s Phase I ESA, dated November 20, 2019, was completed within 180 days prior to Our Katahdin’s acquisition of the property.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: According to historic records, the Wastewater Treatment Plant Lagoons were constructed in the late 1970s. The contaminants of concern in the form of paper slurry/sediment contained within the lagoons occurred during mill operation. The mill and the use of the Wastewater Treatment Plant and Lagoons ceased operation in 2008 prior to Our Katahdin’s ownership. Hazardous building materials in the 36-inch aeration piping originated at the time of construction, maintenance, and/or repairs by previous owners. All disposal of hazardous substances at the site occurred prior to Our Katahdin acquiring the property on November 24, 2019. Our Katahdin has not caused or contributed to any release of hazardous substances at the site. We affirm that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses: Since property acquisition on November 24, 2019, Our Katahdin has maintained and secured the Wastewater Treatment Plant Lagoons. This area of the Site is currently vacant and unused and has been vacant/unused since our acquisition.

(e) Continuing Obligations: Since acquiring ownership of the property on November 24, 2019, Our Katahdin has demonstrated appropriate care and taken reasonable steps in addressing the identified on-Site contamination to (i) stop any continuing releases; (ii) prevent any threatened future release; and (iii) prevent or limit exposure to any previously released hazardous substance. No significant repairs, renovations, or modification to the site, resulting in a release of the hazardous building materials to the environment, has occurred, or is planned. Access to the property (security fence) is restricted and limited to authorized personnel only. Furthermore, the property and vicinity are routinely patrolled by the local police department.

Currently, and during proposed future developments at the site, Our Katahdin will (i) comply with land use restrictions and will not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing cleanup and provide access to the site; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

13. Cleanup Authority and Oversight Structure

a. Cleanup Oversight Plan: Our Katahdin will ensure that the cleanup of hazardous and petroleum substances at the site will comply with applicable local, state, and federal laws and regulations, and that the cleanup actions will be protective of human health and the

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

environment. Our Katahdin will competitively bid and retain a qualified environmental professional (QEP) in accordance with the competitive procurement provisions of 40 CFR Part 30 (for non-profit organizations). The QEP will work with Our Katahdin to design, prepare specifications and bidding documents, and oversee and document remediation activities at the site, as well as to assist with the interface between the Town of Millinocket, MEDEP, and EPA. The QEP will also assist with the competitive bid process for selecting an environmental cleanup contractor to perform the proposed cleanup actions. Our Katahdin will contract with the selected QEP and environmental cleanup contractor prior to initiating cleanup activities. The site will also be entered into the MEDEP VRAP.

- b. Access Plan for Adjacent or Neighboring Properties: Our Katahdin views the adjacent property owners as project stakeholders and cooperative partners in the proposed cleanup actions at the site. We will be in frequent communication with these property owners prior to and during cleanup activities. At this time, the proposed cleanup activities are limited to the site and are not anticipated to extend to adjacent properties. However, if the proposed cleanup or confirmatory sampling/monitoring requires access to the adjacent properties, a formal written access agreement will be obtained from the adjoining property owners, if necessary. Furthermore, the Town of Millinocket and the MEDEP have the regulatory authority to access adjacent properties for emergency situations.

14. Community Notification

Our Katahdin has fulfilled the community notification requirements for the site.

- a. Draft Analysis of Brownfields Cleanup Alternatives: An Analysis of Brownfields Cleanup Alternatives - Preliminary Evaluation (which includes a description of the site, contamination, and cleanup standards/laws; a description of cleanup alternatives evaluated; and a description of the proposed cleanup) was prepared prior to the public notice and public meeting. The draft ABCA and draft grant proposal were made available for public review on-line and at Our Katahdin offices during regular business hours. The public comment period closed at end of business day (5:00 pm) on November 3, 2023.
- b. Community Notification Ad: Our Katahdin published a community notification ad in the *Lincoln News* on October 19, 2023. This advertisement stated that a copy of the draft ABCA and draft grant proposal were available for public review and comment; provided instructions for commenting on these draft documents; identified the location where the draft documents were located for review; and presented the date and time of the public meeting.
- c. Public Meeting: Our Katahdin held a public meeting at 5:30 p.m. on October 24, 2023 using Zoom video conferencing. The purpose of the meeting was to discuss the draft grant proposal, draft ABCA (documents were posted on Our Katahdin's website prior to the meeting) and consider public comments prior to submittal of this grant proposal.
- d. Submission of Community Notification Documents: The following items are included in

Attachment B: Threshold Criteria

FY2024 U.S. EPA Brownfield Cleanup Grant Application

Our Katahdin Wastewater Treatment Plant Lagoons – Former GNP Site, Millinocket, Maine

Attachment D:

- 1) A copy of the draft ABCA-Preliminary Evaluation;
- 2) A copy of the newspaper advertisement demonstrating notification to the public and solicitation for comments on the proposal;
- 3) A summary of the questions/comments received, responses to the questions/comments, and applicable meeting notes from the public meeting (No Questions/Comments Received); and
- 4) A sign-in sheet/Zoom photo of participants from the public meeting.

15. Named Contractors and Subrecipients

Our Katahdin has not procured a contractor or subrecipient to conduct work proposed in this application.



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

November 8, 2023

Our Katahdin
Attn: Sean DeWitt
P.O. Box 293
Millinocket, ME 04462

Dear Sean DeWitt:

The Maine Department of Environmental Protection (Department) understands that Our Katahdin, as a qualifying non-profit, plans to apply for a FY24 Environmental Protection Agency (EPA) Brownfields Cleanup Grant related to the Great Norther Paper Lagoons Site in Millinocket, Maine.

In the past several years, the Department has supported, through the Department’s Brownfields 128(a) grant funding and 104(k) grant funding, a number of environmental assessment and cleanup projects that have been successfully executed by Our Katahdin in the Millinocket area. Maine’s Department of Economic and Community Development’s (DECD) Brownfields Revolving Loan Fund (BRLF) has also supported these projects through both grants and loans in recent years.

Based on Our Katahdin’s successful track record, I expect that both the Department and DECD BRLF will continue to support Our Katahdin’s projects in the future, through both Brownfields grants and loans. I certainly anticipate that support will extend to the Great Northern Paper Lagoons Site.

Should you have any questions or future projects to discuss, please don’t hesitate to contact me by phone at 207-215-8597 or by email at christopher.redmond@maine.gov.

Sincerely,

Christopher Redmond
Department Brownfields Coordinator
Voluntary Response Action Program Manager
Bureau of Remediation and Waste Management, Division of Remediation
Maine Department of Environmental Protection

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

October 22, 2023

Our Katahdin
Attn: Sean DeWitt
P.O. Box 293
Millinocket, ME 04462

Dear Sean DeWitt:

The Maine Department of Environmental Protection (Department) acknowledges that Our Katahdin, as a qualifying non-profit, plans to conduct the cleanup of a brownfield site and is applying for an FY24 Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

Our Katahdin has developed an application requesting site-specific federal Brownfields Cleanup funding for the Great Northern Paper Lagoons site located at the former Great Northern Paper property in Millinocket, Maine.

The Department affirms that the Great Northern Paper Lagoons site:

- i. Is eligible to be enrolled in the Department’s voluntary response program;
- ii. Is currently enrolled in the voluntary response program;
- iii. Has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

For any questions regarding this letter, please contact me at 207-215-8597.

Sincerely,

Christopher Redmond
Department Brownfields Coordinator
Voluntary Response Action Program Manager
Bureau of Remediation and Waste Management, Division of Remediation
Maine Department of Environmental Protection

cc: Katy Deng, EPA Brownfields Region 1

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