City of Sanford, Maine - Narrative Information Sheet
USEPA FY24 Brownfields Cleanup Grant Application

R01-24-C-017

1. Applicant Identification: City of Sanford, 919 Main Street, Sanford, Maine 04073

2. Funding Requested:
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested: $5,000,000

3. Location: Sanford, York County, Maine.

4. Property Information: International Woolen Mill Boiler House, Pioneer Ave., Sanford, ME 04073

5. Contacts:

   a. Project Director:
   Ian Houseal, Director of Community Development
   919 Main Street
   Sanford, ME 04073
   Telephone: (207)-608-4101
   Email: iphouseal@sanfordmaine.org

   b. Chief Executive/Highest Ranking Elected Official:
   Steven Buck, City Manager
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   Sanford, ME 04073
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6. Population: 22,266 (Census Estimate 2022)

7. Other Factors:

Other Factors	**Page #**
Community Population is 10,000 or less.	**4**
The applicant is, or will assist, a federally recognized Indian tribe or United States territory	**N/A**
The proposed brownfield site(s) is impacted by mine-scarred land.	**N/A**
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative	**3 & attached**

and substantiated in the attached documentation.	
The proposed 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 proposed site(s) is in a federally designated flood plain.	**1, 2, 5**
The reuse of the proposed cleanup site(s) will facilitate renewable energy form wind, solar, or geothermal energy.	**2, 3**
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	**2, 3**
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	**1, 2, 5**
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.	**N/A**

8. Releasing Copies of Applications: Not applicable.

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a.i. Overview of Brownfields Challenges & Description of Target Area: Eligible cleanup activities will be conducted in the City of Sanford, York County, Maine (population 22,266). According to EPA's Cleanups in My Community, 112 contaminated sites exist in York County and 37 are in Sanford; the City contains 33% of the County's contaminated sites, despite only 10% of the County's population. The City's former textile mills started in the 1860s along the Mousam River and its flood plains, which weave through the Mill Yard and the Downtown. Mill closings, loss of replacement industries, and devastating fires consumed approximately 18,000 sf of industrial and residential space, leaving large crumbling relics of a once prosperous mill town. Additionally, ***widespread loss of traditional manufacturing industries has had a significant impact***; ***blight and decay persist in the Mill Yard, adjacent inner-city neighborhoods, and Downtown,*** directly impacting economic viability and ability to attract and retain businesses and jobs. ***Safe, affordable housing is scarce*** and developers, initially drawn to large, empty mill space, walk away when they see broken windows, crumbling facades, fire-scarred structures, and industrial buildings from an era of hazardous building materials underlain with contaminated soil and groundwater. ***The Target Area, which includes the priority site described below, is the contaminated and largely vacant Historic Mill Yard*** (a 2.5-mile area along Pioneer Ave, Emery St, High St, River St, and No. 1 Pond). ***With this cleanup grant, the City will be able to eliminate the hazards associated with the priority site, provide parking for future redevelopment of the Mill Yard, and progress toward our goal of improving the health and wellbeing of our residents, providing the community with prospects for new businesses, jobs, and affordable housing.***

1.a.ii. Description of the Priority Brownfield Site(s): The priority Brownfield site targeted for cleanup is the former International Woolen Mill (IWM) Boiler House, an approximately 1-acre site associated with the larger former 7.2-acre IWM complex located along the Mousam River in a federally designated historic district. In the 1800s, the Mousam River was dammed and diverted to make way for industry, and the site was filled with contaminated materials to raise the grade. The 18,900 sf Boiler House structure was built in 1882. The boilers were originally coal-fired and converted to fuel oil in the 1920s, with a total of 24 boilers at the height of operations. One 10,000-gallon and two 20,000-gallon former fuel oil underground storage tanks (USTs) remain within an adjacent UST vault. Mill operations ceased in 2001, leaving the crumbling, contaminated Boiler House. One of two exhaust stacks at the Boiler House collapsed in 2008, just missing nearby residences. The building also abuts Pioneer Avenue, which sits at a higher elevation than the site. A retaining wall holding up Pioneer Avenue serves as a structural wall of the Boiler House building and UST vault.

Numerous historical releases of petroleum products and hazardous materials, drums, asbestos, and buried debris have been discovered at the site. Building materials contaminated with asbestos, polychlorinated biphenyls (PCBs), and lead paint are exposed to the elements through an open collapsed roof, further deteriorating and impacting the building and environment, and potentially exposing the public to contamination, especially the homeless population. A former drainage system inside the Boiler House is also currently conveying contaminated runoff from the site into the Mousam River. The site completed RCRA Closure in 2009 and remains on the RCRA 2020 Corrective Action Baseline List. During RCRA Closure, the USTs were closed and filled with sand; however, the sand is known to be heavily contaminated based on subsequent investigations. Previous investigations also indicate soil and groundwater are contaminated with ***volatile organic compounds (VOCs), metals (arsenic and lead), extractable petroleum hydrocarbons (EPH), polycyclic aromatic hydrocarbons (PAHs), and light nonaqueous phase liquid (LNAPL) above the Maine Department of Environmental Protection (MEDEP) Remedial Action Guidelines (RAGs)***. The City acquired the site by eminent domain on November 9, 2023 due to the severe blight and danger to the public, with a goal of investing as much as possible for cleanup and redevelopment.

1.b.i. Reuse Strategy & Alignment with Revitalization Plans: The City's proposed reuse strategy includes redeveloping the Boiler House site for a much-needed municipal parking to support on-going redevelopment of the Mill Yard and nearby Downtown businesses negatively affected by the blighted and dangerously collapsing condition of the property. This is a crucial step as developers will require parking to attract and support businesses and residents, and removes the hazards posed by the crumbling building. The City's reuse strategy for the remainder of the Mill Yard includes mixed-use housing and commercial spaces with greenspace along the river. The site is within a FEMA flood plain and the reuse plans for the parking lot will be designed to mitigate long-term impacts from climate change, particularly flooding and more frequent inclement weather; specifically the parking lot design will include efficient high-capacity drainage systems

diverting runoff away from the flood plain and river. Emplacing a parking lot in this area instead of housing ensures that residents will not be susceptible to potential future flooding or exposed to residual contamination but will support the creation of housing served by the public parking lot.

Our vision is to create a central core for both existing disadvantaged City residents and migration from other communities seeking to live in an attractive redeveloped mill district with nearby amenities. Most houses and businesses are clustered along Main Street in the Downtown, Mill Yard, and next to the River ***in our Target Area.*** Schools are centrally located within bicycling and walking distance of inner-city neighborhoods and the Mill Yard, served by sidewalks. The community embraces these qualities and use them to leverage economic development in the Mill Yard. The City built a $2.5 million road and bike path through the Mill Yard, completed an Area-Wide Plan (AWP) in 2012 for the revitalization of the Mill Yard (**funded by EPA's Brownfields AWP Pilot Program**), along with a streetscape plan.

The City will focus on the Mill Yard using a ***vision for mixed reuse residential/commercial/recreational use*** consistent with the local Comprehensive Plan, EPA AWP, and community priorities including the Sanford Downtown Land Use & Development Opportunities Plan (2010) which calls for treating the demolished boiler building property as a central core public plaza to the mill complex. The goals of the Comprehensive Plan (2005) include "**revitalizing the Sanford Mill Yard**," "encouraging development in and near the existing built-up areas of Sanford," "protecting the natural resources with a focus on improving the quality of the Town's surface waters, protecting the groundwater, and preserving important habitats," and "revitalizing the downtown of Sanford as a vibrant, mixed-use district." The Comprehensive Plan remains valid due to the lack of funding/resources to support these goals for advancement and redevelopment. The plans ***reflect livability principles and sustainable practices*** by reusing/enhancing existing development in core of community using smart growth principles. Available City and state resources are dedicated to resolving other issues (see Section 2.a.i), and this cleanup funding is desperately needed to eliminate the current hazards and facilitate creation of housing and jobs in empty mills located just next door to residents. Our track record shows we have a sustained commitment to not just clean up Brownfields sites but to ensure redevelopment is consistent with the fabric of the community.

The City has held public meetings for several years to discuss the environmental issues, blight, cleanup plan, and reuse strategy for the site. The meetings were publicized via website, newspaper ads, and social media. Additionally, as part of the condemnation process, flyers were posted at the site and in the vicinity. The public meetings were attended by our public partners and members of the community; we received a number of comments which were responded to in writing. Meeting agenda and minutes (including comments and responses) are published on the City website. In January 2022, the site was listed as a vacant and dangerous building by the City. In November 2022, the City voted and passed a ***$1 million bond to demolish and cleanup the Boiler House site for a new municipal parking lot to serve the target area by a 2/3rd margin***, showing overwhelming informed and committed community support for the proposed reuse project.

1.b.ii. Outcomes & Benefits of Reuse Strategy: The City, and specifically the target area, is in desperate need of new, safe, affordable housing for low-income, disadvantaged residents as well as commercial uses that create jobs and enhance the tax base and vibrancy of the area. The cleanup of the Boiler House site will lead to the creation of a nonprofit municipal parking lot, for future residents, visitors, and workers in the Mill Yard target area. By removing blight and human health and safety hazards posed by the deteriorating structure and contaminated soil and groundwater, the project will also prevent further erosion of the tax base and elevate the depressed property values in the Mill yard (average depreciated value of 10-15%, City Assessor). The cleanup and redevelopment of the Boiler House site using this cleanup grant will spur further assessment, cleanup, and redevelopment of the remaining Mill Yard sites. The ultimate benefits are that ***the area will be remediated, the stigma will be eliminated, and will no longer deter economic investment in the Mill Yard, Downtown, and inner-city neighborhoods***.

Through increased elevations, heavily armored stream banks and retaining walls, and new efficient engineered stormwater controls (larger environmentally sensitive catch basins and culverts), the proposed parking lot will be designed in such a way to serve as a climate adaptation/resiliency tool to protect residents and redeveloped properties from more frequent and extreme flooding due to climate change.

Parking lot lighting will be completely powered by solar energy. The parking lot surface will be constructed with recycled/reclaimed asphalt sourced from a local facility, which is both cost-effective and energy-efficient. The City is considering other ways to facilitate renewable energy at the site, including construction of a solar canopy over the parking lot which would generate green energy for current and future Mill Yard

occupants. These renewable/efficient energy efforts will be marketed to attract future commerce and residents who want to be in the center of a climate-conscious, green redevelopment.
Outcomes of this new grant will be measured by new economic development in the area and number of new jobs created (Sanford Regional Economic Growth Council), expanded tax base from new businesses (City Tax and Assessors data), and housing including both affordable and market rate (Codes Department). The removal and redevelopment of the blighted Boiler House site will help developers see potential for mixed use redevelopment and build on City's successes like the Sanford Mill (discussed below) and soon to be Stenton Trust Mill. We believe ***the Mill Yard will foster broader economic investment in an area where environmental barriers and lack of Brownfields funding now hinder cleanup and redevelopment.***

1.c.i. Resources Needed for Site Characterization: As documented in ACRES, the City invested a total of $198,624 from our current and prior Brownfields grants to assess and characterize the Boiler House site, including 3 Phase I ESAs, 1 Phase II ESA, 2 Hazardous Building Material Surveys, 1 draft Analysis of Brownfields Cleanup Alternatives (ABCA), and cleanup planning. Additionally, to assess potential impacts to the integrity of the Pioneer Avenue retaining wall if the Boiler House was to be removed, we funded a structural assessment as part of cleanup planning activities. SMPDC invested $40,000 of Brownfields assessment funding for a supplemental Phase II ESA. Given the amount of assessment information available, the small size of the site, and based on opinions from environmental professionals, we don't anticipate needing to conduct additional assessment prior to remediation. Should unexpected conditions be encountered, the City will apply for assessment funding from SMPDC, MEDEP's Brownfields program, and/or use municipal funds.

1.c.ii. Resources Needed for Site Remediation: The City expended $274,334.84 in municipal funds in Q3 2023 to remove the crumbling 2nd stack above the roofline to prevent harm to the public and to prepare the site for remediation (invoice attached). Based on the estimated total cost of cleanup, described in Section 3, the EPA funding requested in this application will be enough to complete the remediation of the Boiler House site. If costs exceed the cleanup grant award, the City will apply to SMPDC and Maine Department of Economic and Community Development (DECD)'s RLF. Based on previous discussions with SMPDC and MEDECD, each entity may contribute up to $500,000.

1.c.iii. Resources Needed for Site Reuse: The City secured a **$1 million bond** to fund the redevelopment of the Boiler House site (see attachment). The bond order allows the funding to be used for redevelopment activities and related costs (i.e. remediation); however, as the EPA funding requested in this application will be enough to complete the remediation, the bond will be used for redevelopment costs that aren't eligible for Brownfields funding, i.e., installation of security measures, pavement striping/marking, and lighting and to address any collapses of the structure until the grant is awarded. Based on estimates provided by engineering professionals, we believe the bond is sufficient to cover these costs. The City will consider applying for MEDECD's Downtown Revitalization (DR) Grant program if the bond isn't sufficient. See table below.

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information about the Resource
City Brownfields Grants	(1.c.i.) Assessment	Secured	$198,624 spent
SMPDC	(1.c.i.) Assessment, (1.c.ii.) Remediation	Secured	$40,000 spent for assessment; $500,000 potential cleanup subgrant
MEDEP / MEDECD Brownfields Program	(1.c.i.) Assessment, (1.c.ii.) Remediation	Unsecured	Unknown potential for assessment; $500,000 potential cleanup subgrant/loan
Municipal Funds	(1.c.ii.) Remediation	Secured	$274,334.84 spent for stack removal
Municipal Bond	(1.c.ii.) Remediation, (1.c.iii.) Reuse	Secured	$1 million bond
MEDECD DR Grant	(1.c.iii.) Reuse	Unsecured	Up to $300,000 grant

1.c.iv. Use of Existing Infrastructure: Cleanup and redevelopment of the Boiler House site will include reuse/upgrades to existing stormwater drainage systems if possible. The roadway providing site access will remain. In August 2022, the City was awarded a ***$25 million Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant for the Downtown Sanford Village Partnership Initiative Project***, which builds on the previous accomplishments in the target area with new streets, sidewalks, crosswalks, parking, ADA-compliant features, and other infrastructure upgrades. These new features complement the site cleanup/reuse, providing a safer and more walkable Mill Yard for future residents, workers, and visitors. The proposed redevelopment of the surrounding target area will allow reuse of existing structures and water,

sewer, natural gas, and recently constructed broadband infrastructure in core of the City including Heritage Crossing, recently upgraded with lighting/sidewalks. Gateway Park, Heritage Crossing, Aerofab Parking Lot, Sanford Mill, and soon the Stenton redevelopment all ***reflect the City's on-going efforts to use sustainable practices*** by reusing and enhancing existing development, incorporating smart growth principles, reducing sprawl, and fostering a sustainable and walkable Downtown in redevelopments.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a.i. The Community's Need for Funding: The City and specifically the Mill Yard target area houses a low-income community. The population of the Mill Yard Census Tract is 6,083. Per the 2021 ACS, when compared to York County, the City has higher unemployment (3.3% City vs. 2.3% York), higher poverty (9.5% City vs. 7.7% York), lower per capita income ($32,648 City vs. $36,171 York), and lower mean income ($76,921 City vs. $93,205 York). The extent of vacant properties in the target area (75%, City Assessor) and depressed property values in nearby neighborhoods is daunting, further exacerbating lack of job opportunities and loss of population. Vacancies, poor housing conditions, and depreciated property values lead to increased demand for emergency services, further contributing to financial pressures and competing priorities to environmental cleanup. The presence of the Boiler House site impacts larger community by expanding blight into surrounding neighborhoods, worsening Sanford's "run-down" appearance, which deters new investments in housing, depresses home values and owner-occupancy. Unfortunately, our community doesn't have the capacity to prioritize environmental remediation and reuse. ***Mill Yard residents are struggling day-to-day to keep housing and bring home food***; the residents and employers (those that manage to stay in operation, that is) can only focus on keeping their heads above water and cannot dedicate scarce resources/funding to environmental remediation or reuse. Without this cleanup grant funding, the situation will only continue to worsen. The City ***desperately needs safe, affordable housing and jobs*** for existing residents and to support/attract new residents, and the ***associated parking*** to support the redevelopment. The situation has been aggravated in the last 5 years with an estimated 40.2% increase in home values (Source: MaineBiz, 10/25/2022), barring the low-income population of the Mill Yard from housing security. Residents of adjacent dense and deteriorating inner-city neighborhoods bear greatest burden of the Mill Yard's Brownfields sites – they lost jobs when manufacturers abandoned the mills and from recent fires. They are among Sanford's lowest paid workers and struggle on the lowest rung of the economic ladder. ***Sanford has a proven track record of efficiently using Brownfields grant dollars to stimulate redevelopment. However, our work is far from complete. Without this cleanup grant, our prior efforts will be for naught and the decrepit Boiler House site will continue to be a roadblock for the health and economic wellbeing of our residents.***

2.a.ii.(1) Health or Welfare of Sensitive Populations: ***The Target Area and the adjacent low income residential neighborhoods*** have high density and concentration of sensitive populations (low income, children, women of child-bearing age, minority groups, homeless) which ***are disproportionately impacted by Brownfields*** because of exposure to contamination and recent fires. **72% of renters qualify for rent-restricted units,** assuming incomes up to 60% AMI for 4-person household (Sanford Area Market Assessment, Sanford Housing Authority, 2015). In Sanford, 15.4% of households receive food stamps compared to York County's 7.5% (ACS). Residents living proximate to the boiler house fear for life and limb, feeling unsafe in their homes from the daily exposure to the visible opioid epidemic on their front doorstep in the mill yard. For years, the City has been working with the unhoused community and those in recovery from addiction, who occasionally camp along the Mousam River, in the Mill Yard, and until recently, ***within the Boiler House***, helping provide housing and social services, most recently adding staff to help people find appropriate services and regularly reporting and soliciting community input via City Council meetings. In addition to these economic/welfare struggles, the Mill Yard community faces severe health issues described in the next section. The City and state resources are already dedicated to resolving these intractable issues and this Brownfields cleanup grant is desperately needed to eliminate the public health and safety hazard of the contaminated Boiler House site. The attractive nuisance, blight and contamination at the site is directly exacerbating and contributing to the poor health and welfare of our community. The cleanup and reuse of the site will spur future assessment, cleanup, and reuse of the adjacent Brownfields sites and create new residential/commercial space and greenspace in the target area.

2.a.ii.(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: CEJST identifies the Mill Yard Census Tract as disadvantaged because it's in 93rd percentile for weighted percent of people who have been told they have asthma and the 81st percentile for low income. Information from the Maine

Tracking Network indicates a ***disproportional rate of asthma and COPD emergency department visits*** in the City vs York County. ***Several cancer rates are higher*** in York County than the state average, including leukemia, lung, bladder, brain, and liver, all of which can be linked to contaminants of concern at the Boiler House site and in the Mill Yard. ***Studies indicate that 2.9% children in the City have elevated blood lead levels vs 1.9% at the state level*** (Maine Tracking Network, 2021). A 2008 study by ME Dept. of Health and Human Services indicated that more than 80% of children in communities with ***lead poisoning live in substandard rental housing***, most near mills and Brownfields. These statistics demonstrate that ***residents, especially those in/adjacent to Mill Yard, are disproportionately impacted*** compared to citywide, statewide, and county averages. Our residents' health is compromised by the Mill Yard and specific Boiler House site contaminants, including asbestos, lead paint, PCBs, metals, VOCs, and petroleum. Releases of VOCs from dry cleaners (i.e. Alexsons Cleaners on High Street) also pose a significant risk to human health from vapors. Based on these contaminants and the known toxicological effects, environmental impacts to the soil, water, and air in the target area from Brownfields sites may be contributing to the higher rates of asthma and cancer; lead-based paint in the deteriorating structures and adjacent areas is causing lead poisoning. This cleanup grant will help to reduce these threats by removing and/or limiting exposure to the contamination at the Boiler House site (abate/demolish the building and excavate/cap contaminated soil with a parking lot).
The City will continue the forward progress and ***use the Boiler House site cleanup/reuse as an example for what's achievable in the remainder of the target area and encourage additional cleanup***. The cleanup grant will help us to provide safe municipal parking for the existing community, as well as future residents, workers, and visitors that we hope will descend on the Mill Yard once the reuse strategy is realized.

2.a.ii.(3)(a) Identification of Environmental Justice Issues: CEJST identifies the Mill Yard Census Tract (23031030202), where the Boiler House site located, as disadvantaged. Data from EJSCREEN for the Mill Yard compared to the state average are as follows: 68th percentile for particulate matter, 62nd percentile for ozone, 88th percentile for toxic releases to air, 82nd percentile for traffic proximity, 64th percentile for lead paint, 71st percentile for hazardous waste proximity, 85th percentile for USTs, and 68th percentile for wastewater discharge. Per EJScreen, the Mill Yard is in 82nd percentile for unemployed residents, 81st percentile for low income, and 76th percentile for people of color compared to the state. Meanwhile our population is young and vulnerable – 94th percentile for less than high school education and 93rd for under age 5; 5.6% of the City's population is under the age of 5 and 22.9% is under 18 compared to 4.5% and 18.4% for Maine respectively; and 21.3% of young children in the City are living below poverty level (2020 Census). Pollution sources in the Mill Yard include the 22 Brownfields, 20 state Remediation Sites, and 31 state spill sites. The MEDEP Mousam River 2014 Data Report states the river is "impaired for toxics." The Mill Yard and nearby lower income inner-city neighborhoods have higher density and concentration of sensitive populations (low income, children, women of childbearing age, homeless) and are ***disproportionately impacted by Brownfields*** because of exposure to contamination, recent fires, and airborne debris, raising substantial concerns about environmental justice in the Mill Yard.

2.a.ii.(3)(b) Advancing Environmental Justice: The cleanup grant, reuse of the site as a municipal parking lot, and associated reuse strategy for the target area (mixed commercial/residential and greenspace) and outcomes (new industries/workspaces, job creation, housing, and climate adaptation and recreational/outdoor areas) will advance environmental justice by minimizing/eliminating contact with impacted building materials and soil/water/air, providing safe housing, providing climate resiliency near the river flood plain, and providing economic opportunities/desirable space for investors and businesses. Though the specific site reuse (parking lot) will not directly result in displacement, our local partners described below will work with City government and the local community to minimize displacement of residents/businesses during cleanup/reuse of the target area and ensure the opportunities seen, as a result of cleanup/redevelopment from this grant, are made available locally. Priority will be given to City residents, whenever possible, to ensure our existing community reaps the benefits of Brownfields cleanup and redevelopment. We'll work with our partners to connect community members in need and the homeless with affordable housing, giving priority to those already in the target area. Incentives will be provided to local businesses (TIFs, ARPA funding) and advocated through SREGC and the Chamber of Commerce.

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

Name of organization/ entity/group	Point of contact (name and email)	Specific involvement in the project or assistance provided

York County Community Action Corp. (YCCAC)	Carter Friend, carter.friend@yccac.org	Community-based org located in the Mill Yard. Community outreach, children and family assistance, healthcare, home ownership (classes, repair grants), heat/energy assistance. Assist with disseminating project information & data, identifying stakeholders, engaging community, and ensuring reuse plans align with community needs.
Sanford Regional Economic Growth Council (SREGC)	Keith McBride, kmmcbride@sanfordmaine.org	Non-profit. Showcase this cleanup and redevelopment project, attract business owners, investors, and developers to the target area, work with community on revitalization, help prepare strategies, disseminate project information & data.
Southern Maine Health Care (SMHC) Sanford	Betsy Kelly, blkelly@smhc.org	Local healthcare services next to Mill Yard, serves community and low-income residents. Assist with disseminating project information & data, identifying stakeholders, engaging community, track health data.

2.b.iii. Incorporating Community Input: The City will use the following tools, which have been successful in past Brownfields efforts: **City Website** (notices about public meetings, meeting minutes, project updates, Brownfields information repository including assessment/cleanup reports, presentations); **Public Meetings** (including regularly scheduled City Council meetings and specially scheduled meetings, at a frequency of at least 1/quarter, meetings broadcast via Zoom and public access TV); **Newspaper, E-Mail Listserv, and Social Media** (provide project updates and photos, advertise meetings). City Hall is located Downtown blocks from the Mill Yard. Public City Council meetings occur the 1st and 3rd Tuesdays of the month providing regular opportunities to discuss the cleanup grant, project progress, and outcomes as needed. The City will create paper flyers/postings/fact sheets at least once per year to publicize the project progress and solicit input. Sampling/monitoring data (air, soil, water) and meaningful interpretations of the results will be shared with community partners and SMHC Sanford to post in City Hall, partner buildings and on websites to increase public access/awareness. The City will establish a Brownfields Advisory Committee (BAC) that meets quarterly and includes members of the City, Qualified Environmental Professional (QEP), MEDEP, EPA, cleanup contractor, local community partners (see table above), and citizen/project stakeholders.
The City recognizes and embraces our diverse community. All public communication involving this Brownfields project will publicize the state TYY line for community members hard of hearing, have speech disabilities, or require translation. Translators are also provided at YCCAC. We consider **all** input, because ***this project is for the benefit of our community***, and will respond to requests/comments using these methods, along with direct written responses, as necessary. We will also set up additional meetings/postings/publications, as needed, to further respond to public input/comments. Our plan will be documented in a **Community Involvement Plan** (CIP) for the site. A public meeting and 30-day public comment period will be conducted prior to initiating cleanup activities, and the ABCA will be finalized.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS

3.a. Proposed Cleanup Plan: Historical environmental site investigations identified elevated levels of VOCs, metals (arsenic and lead), EPH, PAHs, and petroleum-based LNAPL in soil and groundwater at concentrations above the applicable MEDEP RAGs for cleanup. In addition, hazardous building materials including asbestos, lead-based paint, PCBs, and universal wastes (e.g., mercury switches, light fixtures/bulbs, lead-acid batteries, and other toxic chemicals) were identified within the Boiler House structure, which are required to be properly abated by licensed abatement contractors prior to or during final building demolition, in accordance with state and federal regulations. As detailed in the draft ABCA, the cleanup of the building structures and subsurface media is further detailed below:

Building Cleanup Plan: Given that the buildings are already partially collapsed and hazardous materials are present throughout, requiring immediate attention to prevent further exacerbation of contaminated media, the selected cleanup plan is to abate hazardous building materials and demolish the structures at the same time. This cleanup alternative is the most feasible, safe, and cost-effective option and includes a single contractor removing hazardous building materials and demolition debris concurrently and properly disposing the materials off-Site at a licensed landfill. Wood, metal, and other non-deleterious materials will be segregated for recycling and approximately 150 to 200 cubic yards (CY) of mixed asbestos/lead-based paint/masonry and 30 CY of PCB materials will be abated/removed along with various other asbestos materials throughout the building. Air monitoring will be conducted during abatement to ensure protection of nearby human and environmental receptors. Based on structural assessments, the cleanup cannot occur without retrofitting and

stabilizing the Pioneer Avenue retaining wall supporting the back of the Boiler House structure and the back of the UST vault. Therefore, the cleanup plan includes Pioneer Avenue stabilization, including mortar replacement, installation of dowels and reinforcements, and new concrete.

Soil, Groundwater, & UST Cleanup Plan: The selected cleanup plan is to remove and properly dispose/ recycle the UST vault and the 3 USTs (including the contaminated fill sand) to access underlying contaminated soils; excavate elevated soil hot spot areas and properly dispose of these contaminated soils at a licensed landfill; consolidate/contain remaining impacted soil; cover remaining impacted soils with MEDEP-approved engineered cover systems; and update the existing Declaration of Environmental Covenant (DEC) to prohibit future disturbance of remaining impacted soils without proper management and limit site use for parking. To the extent feasible, heavily oil-saturated soils will be segregated from lower or less contaminated soils for proper management and off-Site disposal in separate waste streams at appropriate facilities. Approximately 1,200 to 1,500 CY of contaminated soil will require excavation and off-Site disposal at a licensed landfill. Remaining areas with less-contaminated urban fill soils, or areas where the contaminated soils are deeper, will either be covered/capped in-place or relocated, consolidated, and covered/capped with a cover system. Up to 100,000 gallons of contaminated groundwater will be pumped to facilitate soil excavation. Restoration and cover system construction requires approximately 1,400 to 1,600 CY of clean soil fill, 800 to 1,000 CY of structural fill, and 400 to 500 CY of asphalt and concrete. The cover systems will double as a municipal parking lot serving the Mill Yard and Downtown, per the City's reuse strategy. Concurrent with cleanup, the existing DEC will be updated and an Environmental Media Management Plan (EMMP) will be generated to manage future construction (e.g., subsurface utility repairs/upgrades). During cleanup, standard industry abatement and construction practices will be employed to ensure safe conditions and protect the public and our sensitive populations; these measures include dust controls and building/hazard containment systems to contain potentially air-borne hazardous materials and debris during abatement and cleanup activities and air clearance testing following the abatement. The cleanup work will be conducted by licensed contractors and materials will be properly disposed of at licensed disposal facilities. The QEP will prepare a CIP, finalize the ABCA, and generate a Remedial Action Plan (RAP) and specifications. The QEP will prepare a Site-Specific Quality Assurance Project Plan (SSQAPP) and will conduct confirmatory sampling, as necessary. The project will implement Green Remediation Principles and Techniques including waste recycling/reuse, reduced energy consumption, and limits on engine idling. Final cleanup documentation will be prepared and submitted to MEDEP/EPA. MEDEP will oversee and approve final environmental regulatory closure.

3.b.i. – 3.b.iv. Project Implementation, Schedule, Leads, and Outputs:

Task 1: Cooperative Agreement Oversight

i. Project Implementation:

- EPA-funded tasks/activities: Project coordination and oversight; Grant management/cooperative agreement oversight, compliance with technical requirements, ensure protection of human health and the environment; Develop a Request for Proposals (RFP) and select a QEP; attend 2 National Brownfield Conferences and 1 Regional Conference; prepare performance and financial reports including quarterly reports, MBE/WBE forms, Davis-Bacon Act (DBA) reporting, and routine updates to ACRES. Meet with QEP at least biweekly to track project progress.
- Non-EPA grant resources needed to carry out tasks/activities: City funds in-kind project oversight (time for financial drawdowns from ASAP, maintaining files, planning and economic development staff and legal services, procurement of QEP) at no cost to the grant.

ii. Anticipated Project Schedule: RFP and selection of the QEP within the first 3 months (1st Quarter) of funding award; BAC meetings to be held on a quarterly basis; quarterly reports and ACRES database updates each quarter during the 3-year grant period; and other reporting (DBA, MBE/WBE), as necessary.

iii. Task/Activity Lead: The City will lead all programmatic grant activities. The City will develop RFP for QEP selection and establish BAC. QEP will prepare quarterly reports, DBA and MBE/WBE reports, and ACRES updates.

iv. Outputs: Competitive RFP and contract for QEP; at least 100 meeting agendas for biweekly calls with City and QEP; 16 quarterly reports (1/quarter for 4 years); and DBA and MBE/WBE reporting and ACRES input/updates over 4-year grant period.

Task 2: Community Outreach & Engagement

i. Project Implementation:

- EPA-funded tasks/activities: Per our community engagement plan (Section 2b above), the City and its QEP will develop a CIP for approval by EPA and MEDEP, and establish the BAC and meet quarterly. The City, QEP, and community partners will develop an information repository; notify residents, adjacent landowners, and target communities of public meetings and cleanup schedules; hold public meetings to inform, educate, solicit public input, and provide written responses to comments; update the

target community regarding cleanup and redevelopment activities; and prepare public outreach materials including flyers once per year. Sampling/monitoring data and interpretations of the results will be shared with the community and posted in buildings and on websites. A 30-day public comment period will be held to solicit input on the draft ABCA prior to finalization. The City will provide outreach and communication to the public prior to, during, and following the cleanup work, and generate FAQs.

- Non-EPA grant resources needed to carry out tasks/activities: City staff will provide additional public outreach and economic development support at no cost to the grant and host meetings at City Hall. Community organizations to assist with outreach.

ii. Anticipated Project Schedule: Establish BAC in the 1st quarter of the grant and meet quarterly. The 1st public meeting will be held for the 30-day public comment period on the draft ABCA and will occur within 6 months (2nd quarter) of the grant award and following preparation of draft cleanup plans and specifications (i.e., to solicit public input on the final draft abatement/cleanup plans). The 2nd meeting will be held during on-going contractor abatement/cleanup work (progress status meeting), and the 3rd meeting will be held at end of abatement/cleanup. Flyers/postings generated once per year; sampling/monitoring data shared during the cleanup (at least once per quarter).

iii. Task/Activity Lead: The City and QEP will conduct community outreach and engagement tasks. The BAC and community partners will assist with outreach and engagement.

iv. Outputs: Establish BAC and meet quarterly (16 total, incl. meeting minutes); information repository; CIP; at least 3 public outreach meetings and associated informational materials and public meeting documentation (ads, agendas, comments, responses to comments, sign in sheet); 4 project flyers (1 per year); sampling/monitoring fact sheets (at least 4, 1 per quarter during cleanup); 4 newspaper ads & social media posts (at least 1 per year); FAQs, and final ABCA.

Task 3: Site-Specific Cleanup Activities

i. Project Implementation:

- EPA-funded tasks/activities: Most of the cleanup grant funds will be used to implement the cleanup plan. Prior to the start of site work, the QEP will prepare a final RAP and specifications for review and approval by the City, EPA, and MEDEP; prepare updated cleanup cost estimates, as necessary; pre-bid site visit with potential contractors; and prepare a SSQAPP for confirmatory sampling and monitoring. The City and QEP will review contractor bids and select a cleanup contractor. The QEP and selected cleanup contractor will obtain necessary permits and coordinate with SMHC Sanford on monitoring activities during cleanup. The City and the QEP will be in communication with the community, BAC, MEDEP, and EPA throughout this phase of work. The selected cleanup contractor will prepare a health and safety plan (HASP) and work plans and will perform all required abatement and cleanup in accordance with the project plans and specifications.
- Non-EPA grant resources needed to carry out tasks/activities: City staff will coordinate with SMHC and provide economic development support at no cost to the grant.

ii. Anticipated Project Schedule: The QEP will prepare project documents and cleanup design within 3 to 6 months of selection (winter 2024/spring 2025). A SSQAPP will be prepared, a contractor selected, and permits will be obtained at this time. We plan to start cleanup activities in the summer/fall of 2025 and will complete cleanup work by Q1-Q2 2029.

iii. Task/Activity Lead: QEP with the City oversight will prepare final RAP and specifications, SSQAPP, and conduct pre-bid site visit,. The City with assistance from BAC and QEP will select cleanup contractor. QEP and selected cleanup contractor will obtain final cleanup permits, as necessary, and contractor will generate HASP, work plans, and perform cleanup work.

iv. Outputs: Final RAP, specifications, bidding documentation, contract with cleanup contractor, SSQAPP, construction/cleanup permits, HASP, work plan, and cleanup in accordance with the ABCA and approved project plans and specifications.

Task 4: Oversee Site Cleanup

i. Project Implementation:

- EPA-funded tasks/activities: The City and QEP will monitor and oversee project progress, public health, and welfare during the proposed abatement/cleanup activities; oversee the contractor's cleanup activities; attend up to three project status meetings with BAC; perform the necessary inspections and reporting during and after cleanup to ensure compliance with the plans, specifications, and requirements for regulatory closure; review and approve pay requisitions and DBA documentation; perform a final site walk-through; collect confirmatory samples per the SSQAPP; conduct health monitoring and air sampling. An updated DEC, EMMP, and cleanup completion report will be completed to obtain MEDEP approval following the cleanup and EPA grant closeout documentation will be completed at the end of project.
- Non-EPA grant resources needed to carry out tasks/activities: City staff will provide additional in-kind cleanup oversight at no cost to the grant. City's attorney will provide legal support on DEC.

ii. Anticipated Project Schedule: Cleanup activities to begin summer/fall 2025 and closure reports and documentation will be generated upon completion of the cleanup work (by Q1-Q2 2029). This work will be completed within the 4-year grant period.

iii. Task/Activity Lead: With direction and assistance from the City, the QEP will oversee, monitor, and document site abatement and cleanup activities. The City will assist with project oversight and will be in communication with BAC, MEDEP, and EPA team members throughout the abatement/cleanup phase of work. The QEP will also prepare project closure reports and assist the City with grant closeout documentation. The City, QEP, and legal counsel will prepare and record the DEC and EMMP.

iv. Outputs: 5 project status meetings, payment requisitions and DBA documentation, confirmatory sampling and health monitoring data, DEC, EMMP, MEDEP Completion Report, MEDEP approval documentation for the completed cleanup, and grant closeout documentation.

3.c. Cost Estimates:

Budget Categories		Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach and Engagement	Task 3: Site-Specific Cleanup Activities	Task 4: Oversee Site Cleanup	Total
Direct Costs	Personnel*	$0	$0	$0	$0	$0
	Fringe Benefits	$0	$0	$0	$0	$0
	Travel	$7,500	$0	$0	$0	$7,500
	Equipment	$0	$0	$0	$0	$0
	Supplies	$0	$7,500	$0	$0	$7,500
	Contractual	$35,000	$12,500	$302,500	$110,000	$460,000
	Construction	$0	$0	$4,525,000	$0	$4,525,000
	Other	$0	$0	$0	$0	$0
Total Direct Costs		$42,500	$20,000	$4,827,500	$110,000	$5,000,000
Indirect Costs		$0	$0	$0	$0	$0
Total Budget		$42,500	$20,000	$4,827,500	$110,000	$5,000,000

Detailed Costs Per Unit are based on previous grant activities, the ABCA, and QEP/contractor estimates.
****The City has elected to fund all personnel/fringe legal costs through City funds in order to use as much grant funding as possible for the cleanup project for the benefit of the community***, as with our previous Brownfields grants.

Task 1: Cooperative Agreement Oversight: $7,500 travel total ($2,500 airfare, $3,000 hotel, $2,000 per diem for City staff to attend 2 EPA National Conferences and 1 Regional Conference; and **$35,000** contractual for QEP to assist the City with cooperative agreement oversight. **Total Task 1 = $45,000**.

Task 2: Community Outreach and Engagement: $7,500 for supplies (4 newspaper ads/press releases, 4 flyers, and 4 sampling/monitoring fact sheets $625 each ($7,500 total)); and **$12,500** contractual for QEP to assist the City on public outreach efforts, deliverables, and public meetings. **Total Task 2 = $17,500**.

Task 3: Site-Specific Cleanup Activities: $302,500 contractual for QEP to generate RAP, SSQAPP, specifications and bidding documents, select cleanup contractor, permitting submittals and approvals, and project coordination and meetings with BAC, EPA, MEDEP, and cleanup/abatement contractors; and **$4,525,000** in total cleanup construction costs for performing the abatement/cleanup activities using Federal Funding under this cleanup grant, including $1,150,000 for building stabilization, building abatement & demolition, transportation & disposal, $2,250,000 for the retaining wall retrofit, and $1,125,000 for UST vault cleanup/removal, soil excavation, transportation & disposal, and capping (note, preliminary cost estimates were obtained in Summer 2023; final competitive bids will be procured before cleanup). **Total Task 3 = $4,827,500**.

Task 4: Oversee Site Cleanup: $110,000 contractual for QEP to oversee the cleanup activities, perform necessary project monitoring and documentation, collect confirmatory samples, attend at least 5 project status meetings with BAC, and prepare a remediation and grant closure reports. **Total Task 4 = $110,000**.

3.d. Plan to Measure and Evaluate Environmental Progress and Results: At the beginning of the project, the City and QEP will set realistic milestones and a schedule for site work, deliverables, and community engagement events and create an electronic matrix (Microsoft Excel spreadsheet) of tasks, target dates, and financial expenditures. We will meet at least biweekly to track grant/project progress and review the status of site work and deliverables, overall budget, community comments/input, and funds expended/remaining. Information on the project progress and budget will be recorded in Quarterly Reports and in ACRES. We will also track ongoing outcomes including reduction of environmental risks; number of jobs created; amount of leveraged cleanup and redevelopment funds; and other leveraged or environmental & economic outcomes. The outputs and outcomes will be reviewed and revised regularly in conjunction with regional EPA and MEDEP staff to ensure the project is successful. The City uses these practices for the existing FY19 Multipurpose Grant with great success, and we also implemented this strategy for the Brownfields cleanup of the adjacent Aerofab site.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a.i. - 4.a.ii. Organizational Structure & Key Staff: This cleanup grant will be managed and administered by Mr. Ian Houseal, Community Development Director. He holds degrees in regional planning, architecture, and environmental science, and has worked in Sanford, Lewiston, and Portland, ME with a focus on housing

development and community betterment for over 15 years. Mr. Houseal successfully manages numerous state and federal grants, including City's most recent Brownfields grant. He will work closely with Mr. Steve Buck, City Manager in Sanford for over 10 years, the Planning and Code Enforcement Departments, and Mr. Keith McBride, Executive Director of SREGC, which has been instrumental in working with property owners/prospective developers in structuring Brownfields redevelopment projects. Ms. Erin McMann, City Treasurer, will be responsible for financial management, tracking, and reporting for this grant. She currently oversees financial management of our Multipurpose Grant. These staff manage the current Brownfields program and will continue to ensure the timely and successful expenditure of funds and completion of this cleanup project and associated grant requirements within the 4-year period of performance.

4.a.iii. Acquiring Additional Resources: The City will contract with a QEP using federal guidelines for procurement and qualifications-based competitive bid process. The City will evaluate potential QEPs' knowledge/ability/experience with local Brownfields programs/grants in ME, EPA requirements, applicable laws/regulations, reuse/cleanup work, redevelopment/financing, and community outreach, with a focus on firms with a proven equitable track record and strong labor practices. Our procurement process will be conducted in accordance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and as provided in EPA guidance and other applicable state and federal laws. The City's law firm, Bernstein Shur, is experienced with Brownfields/environmental regulations and will assist with document review/consultation. The City will seek financial assistance from MEDEP and SMPDC's Brownfields Revolving Loan Funds, and other loan/grant programs, as needed, to supplement and ensure the success of this grant. Where possible, the City will link members of the community to potential employment opportunities in Brownfields.

4.b.i.(1) Currently Has or Previously Received an EPA Brownfields Grant – Accomplishments: The City has received multiple Brownfields grants since 2012, including Planning, Assessment, Cleanup, and Multipurpose Grants. The 3 most recent grants include a $400,000 FY12 Assessment Grant (BF 96165901), $300,000 FY18 Assessment Grant (BF 00A00457), and $800,000 FY19 Multipurpose Grant (BF 00A00430). The City has a successful track record over the past 10 years of managing Brownfields funds. The City has completed all quarterly reports and updated information in ACRES relative to the closed and current grants. The outputs of last 3 grants include 12 Phase I ESAs, 12 QAPPs, 11 Phase II ESAs/HBMSs, 4 ABCAs, 3 VRAP applications, and 1 closure report. ***All 3 grants provided funding for assessment and cleanup planning at the Boiler House***, positioning the site for cleanup and redevelopment made possible by this cleanup grant. The grants funded assessment and cleanup planning and a **successful cleanup/redevelopment project** at the CGA Site, a former circuit board manufacturer and chemical dumping ground, which posed a serious human health and environmental hazard to the community. The CGA Site remediation achieved regulatory closure with MEDEP and EPA, and the site is being redeveloped with grid-scale solar, providing renewable energy to the grid, specifically to the Mill Yard. The City leveraged $475,000 for this cleanup, including municipal, MEDEP, ME DECD, and private developer funding. In addition, these grants allowed for assessment and cleanup at the Stenton Trust Mill. Under the Multipurpose Grant, 2 USTs were assessed/removed, a PCB oil spill assessed/remediated, and an HBMS was completed to provide necessary cost estimates for cleanup, where previously unknown costs deterred redevelopment. Winn Companies has initiated local permitting to cleanup and transform the Stenton Trust Mill into 90 new residential units and commercial storefronts in the Mill Yard. This cleanup grant must be secured to continue our forward progress in the target area.

4.b.i.(2) Currently Has or Previously Received an EPA Brownfields Grant – Compliance with Grant Requirements: The City successfully completed all required reporting obligations for the 3 most recent closed and current grants, including quarterly reports, ACRES updates, and grant closeout reports. All grants and associated deliverables were completed well before end of performance period demonstrating the ongoing need for assessment funds and our capacity to perform. The City complied with the workplans and terms and conditions for all 3 grants. ACRES updating and quarterly reporting for the FY19 Multipurpose Grant is ongoing. The City, QEP, and our EPA Project Officer meet periodically to discuss grant compliance/forecasting. The FY12 and FY18 Assessment Grants were fully expended within grant period. The FY19 Multipurpose Grant is open with $59,402.84 remaining (93% expended) as of 10/1/2023). Remaining funds will be spent on cleanup planning for both the Boiler House site and Alexsons Cleaners, community outreach, and 1-2 Phase I ESAs in underserved communities. We expect to expend the remaining funds in early 2024, well before the end of the grant period.

Threshold Criteria for Cleanup Grants – City of Sanford, Maine
USEPA FY2024 Brownfields Cleanup Grant Application

1. Applicant Eligibility

The City of Sanford, Maine (City) is a municipality (General Purpose Unit of Local Government) eligible to apply for Brownfields Assessment funding from the U.S. Environmental Protection Agency (EPA) Brownfields Grant Program.

2. Previously Awarded Cleanup Grants

The proposed site, the International Woolen Mill Boiler House, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City has an open FY2019 Multipurpose Grant (BF 00A00430) with $59,402.84 remaining (93% expended) as of 10/1/2023). Documentation of the funds drawn down and remaining balance is attached.

4. Site Ownership

The City is the current owner of the site. The City acquired the associated parcels by eminent domain action of the Sanford City Council on November 8, 2023, as recorded in the York County Registry of Deeds on November 9, 2023 at Book 19344 Page 435.

5. Basic Site Information

a) International Woolen Mill Boiler House
b) Pioneer Avenue, Sanford, ME 04073

6. Status and History of Contamination at the Site

a) The site is contaminated by both hazardous substances and petroleum (co-mingled).
b) The site was developed as part of the Goodall Textile Mills with a boiler house structure as early as 1882. The adjacent Mousam River was dammed and diverted, and the site was filled with contaminated materials to raise the grade. The boilers were originally coal fired and were converted to fuel oil in the 1920s, with a total of 24 boilers at the height of operations. Fuel oil was stored in an adjacent underground storage tanks (UST) concrete vault in three 10,000-gallon and two 20,000-gallon fuel oil USTs. One of two exhaust stacks at the Boiler House collapsed in 2008, just missing nearby residences. The second stack was removed above the roofline in spring 2023 at the City's expense to prevent another public safety disaster. The building was unsecure prior to November 9, 2023 when the City took possession of the property, exposing the public to contamination, especially the homeless population.
c) Based on numerous environmental investigations, building materials are contaminated with asbestos, polychlorinated biphenyls (PCBs), and lead. Soil and groundwater are contaminated

with volatile organic compounds (VOCs), metals, petroleum, polycyclic aromatic hydrocarbons (PAHs), and light nonaqueous phase liquid (LNAPL). The USTs were filled with sand in 2005 and the fill sand is documented to be contaminated with residual petroleum. The building includes a drainage system which is currently conveying contaminated runoff into the Mousam River, as confirmed by recent drain surveying and tracing.

d) The building was constructed and renovated over time when hazardous building materials were widely used. Asbestos, PCBs, and lead-based paint are present throughout the Boiler House structure, and the collapse of the first stack lead to the liberation of asbestos materials throughout the interior of the structure. The site is underlain from the surface to approximately 5-6 feet below grade with contaminated urban fill materials, which were emplaced over time from the beginning of site development in the late 1800s through expansion of the mill complex in the 1920s. The fill materials are present throughout the entire site boundary and adjacent properties. Additional contamination has been identified due to the industrial history of the site and longtime use of hazardous substances and petroleum during mill operations. Housekeeping practices and environmental regulations were not at today's standards during mill operations and there are numerous reported historical releases of petroleum products and hazardous materials at the site. The UST vault contains petroleum-impacted fill sand and LNAPL has been documented in the immediate vicinity of the UST vault, likely associated with historical releases from the tanks.

7. Brownfield Site Definition

The City affirms that the site is not listed or proposed for listing on the National Priorities List, not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERLCA, and not subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Application

Several Phase II Environmental Site Assessment and Hazardous Building Material Survey (HBMS) Reports compliant with ASTM E1903-19 have been prepared for the site:

- June 2009: Limited Phase II ESA Subsurface Investigation
- January 2017: Limited HBMS
- March 2017: Limited Phase II ESA Subsurface Investigation
- October 2019: Pre-Demolition HBMS
- November 2019: Supplemental Phase II ESA Subsurface Investigation

These assessments including soil and groundwater sampling, hazardous building material sampling, and drain surveying and tracing. Additional environmental assessment work was performed during RCRA Closure activities, undertaken between 2002 and 2009.

9. Site Characterization

The site is not eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program. However, the cleanup at the site is eligible to be overseen by Maine Department of Environmental Protection (MEDEP) Brownfields Section as described in the letter from the MEDEP, attached. An Environmental Professional (as defined in 40 CFR § 312.10) has certified that

there is a sufficient level of site characterization from the environmental assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

The City affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The site is listed on the RCRA 2020 Corrective Action Baseline List under EPA ID MED057977092. Information required for a property-specific determination is attached on a separate page and has also been provided to the City's EPA Project Officer, Ms. Dorrie Paar.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is co-mingled with hazardous substances and petroleum contaminants. However, the predominant contaminants are hazardous substances.

a. **Property Ownership Eligibility – Hazardous Substances Sites**
iii. Landowner Protections from CERCLA Liability
(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition
The City acquired the site by eminent domain action of the Sanford City Council on November 8, 2023, as recorded in the York County Registry of Deeds on November 9, 2023 at Book 19344 Page 435. The City holds fee simple title of the two parcels associated with the site. The previous owner was REGCO, Inc., a bankrupt entity based in Miami, Florida. The City has no relationships or affiliations with any prior owners or operators, including REGCO, Inc.

(b) Pre-Purchase Inquiry
On behalf of the City, TRC completed a Phase I ESA compliant with ASTM E1527-21 and AAI on October 25, 2023. Mr. Charles Springer, PG, of TRC performed the Phase I ESA. Mr. Springer has over 20 years of experience, holds a Bachelor of Science degree in Geology from Lafayette College (2000), has held a Professional Geologist's license since 2005, and meets the definition of environmental professional as defined in §312.10 of 40 CFR 312.

(c) Timing and/or Contribution Towards Hazardous Substances Disposal
All disposal of hazardous substances at the site occurred before the City acquired the property. The City did not cause or contribute to any release of hazardous substances at the site. The City affirms that it has 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
The City has not used or operated the Site since acquisition. The site is unoccupied. The

City has no relationship to the prior users.

(e) Continuing Obligations

The City is not aware of any continuing releases at the site and no oil and/or hazardous materials are stored at the site. The City is working to secure the site building to prevent any threatened future release and prevent access to previously released hazardous substances. The City regularly conducts inspections of the site and surrounding area to monitor conditions, and we comply with local and state requirements. The City affirms its commitment to comply with any land use restrictions (including the Declaration of Environmental Covenant recorded for the site on June 12, 2011) and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may have been issued in connection with the property; and provide all legally required notices.

13. Cleanup Authority and Oversight Structure

a. The City will contract with a qualified environmental professional (QEP) to conduct, manage, and oversee the cleanup. The City will use municipal and federal guidelines for procurement and qualifications-based competitive bid process. The City will evaluate potential QEPs' knowledge/ability/experience with local Brownfields programs/grants in Maine, EPA requirements, applicable laws/regulations, reuse/cleanup work, redevelopment/financing, and community outreach, with a focus on firms with a proven equitable track record and strong labor practices. Our procurement process will be conducted in accordance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and as provided in EPA guidance and other applicable state and federal laws. The City's law firm, Bernstein Shur, is experienced with Brownfields and environmental regulations and will assist with document review/consultation. The QEP will be under contract by the end of Q1 2025, prior to beginning the cleanup activities.

   At the beginning of the project, the City and QEP will set realistic milestones and a schedule for site work, deliverables, and community engagement events. The QEP will be on-site during all site work to document activities and ensure compliance with the cleanup plan and all relevant local, state, and federal regulations. The City and QEP will meet at least monthly to track grant/project progress and review the status of site work and deliverables, overall budget, community comments/input, and funds expended/remaining. The City and QEP will continually track, measure, and evaluate the project progress and review conversations with stakeholders (including community members). Information on the project progress and budget will be recorded in Quarterly Reports and in ACRES. We will provide regular updates to EPA and MEDEP.

   Due to the site's listing on the RCRA 2020 Corrective Action Baseline List, state legal statues and policy prevent participation in MEDEP's Voluntary Response Action Program (VRAP). However, as specified in the attached letter, MEDEP will provide regulatory oversight, technical oversight, and review cleanup activities and deliverables through other programs, including MEDEP's Brownfields and RCRA Corrective Action and Closure programs, which are able to formally acknowledge the completion of the site cleanup. The City will engage with MEDEP

and EPA to ensure that the cleanup is protective of human health and the environment.

b. The City may require access to adjacent properties to perform confirmation sampling of soil, groundwater, or air. The City plans to conduct air monitoring during abatement/demolition. The majority of the properties located adjacent to the site are municipally owned and therefore accessible by the City and our QEP to conduct the sampling and monitoring. If access to other properties is required for this purpose, the City and our attorneys will work with the owners to secure access agreements. We will hold discussions with the owners and provide fact sheets and data to convey information about the cleanup and results of the sampling/monitoring. This information will also be provided in public meetings and notices.

14. Community Notification

a. Draft Analysis of Brownfields Cleanup Alternatives

As described below, the community was provided with an opportunity to review and comment on the draft Brownfields cleanup application, which included an attached updated project budget sheet and draft Analysis of Brownfields Cleanup Alternatives (ABCA). The budget sheet and draft ABCA are attached.

b. Community Notification Ad

The City published a community notification ad in the Waterboro Reporter, a local newspaper, on October 5, 2023. The ad clearly states that a copy of the grant application, including the draft ABCA(s), is available for public review and comment; how to comment on the draft application; where the draft application is located; and the date, time, and location of the public meeting. A copy of the newspaper ad is attached.

c. Public Meeting

The City held a public hearing to discuss the draft application on October 17, 2023. The hearing was held during a regularly scheduled City Council meeting, and the public could attend in-person or by remote methods (via Zoom). The City makes all meetings accessible to persons with limited English proficiency and persons with disabilities by advertising the Maine Relay service, which includes TYY. No public comments were received, and therefore no responses were necessary. The meeting minutes and meeting sign-in sheets are attached.

In addition to this public meeting, the City Council discussed the Boiler House eminent domain process and cleanup plan during regularly scheduled City Council meetings on October 3, October 17, and November 8, 2023, and during the Land Bank Commission public meetings on September 13 and October 11, 2023.

d. Submission of Community Notification Documents

The following documents are attached:

- Updated project budget sheet (prepared by TRC, dated October 2023) and Draft ABCA (prepared by TRC, dated August 2023)
- Copy of the newspaper ad (published October 5, 2023)
- Meeting minutes from the October 17, 2023 meeting
- Meeting sign-in sheets from the October 17, 2023 meeting

Because no public comments were received, and responses were not necessary, these items are not attached to the application.

15. Contractors and Named Subrecipients

- **Contractors:** Not applicable.
- **Subrecipients:** Not applicable.

Attachments:

1. FY2019 Multipurpose Grant (BF 00A00430) ASAP Funds as of 10/01/2023
2. MEDEP Letter, dated October 24, 2023
3. Property-Specific Determination
4. Updated project budget sheet (prepared by TRC, dated October 2023) and Draft ABCA (prepared by TRC, dated August 2023)
5. Community Notification Ad, published October 5, 2023
6. Meeting Minutes, October 17, 2023
7. Meeting Sign-In Sheets, October 17, 2023

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JANET T. MILLS
GOVERNOR

MELANIE LOYZIM
COMMISSIONER

October 24, 2023

City of Sanford
Attn: Ian Houseal
919 Main Street
Sanford, ME 04073

Dear Ian Houseal:

The Maine Department of Environmental Protection (Department) acknowledges that the City of Sanford plans to conduct the cleanup of a brownfield site and is applying for an FY24 Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

The City has developed an application requesting site-specific federal Brownfields Cleanup funding for the International Woolen Mill Boiler House Parcels property (Site), located on Pioneer Avenue, Sanford, Maine.

The Department affirms that the Site has had a sufficient level of characterization from the environmental site assessments performed to date for the remediation work to begin on the Site.

The Site is not eligible to be enrolled in the Department's Division of Remediation Voluntary Response Action Program (VRAP) because the Site is a portion of the International Woolen Co Inc property, which is listed on EPA's Resource Conservation and Recovery Act (RCRA) 2020 list. Department legal statutes and policy prevent participation in VRAP for properties on the RCRA 2020 list. Regardless, the Site is eligible to receive Department regulatory oversight, technical oversight, and review of any cleanup actions through other Department Division of Remediation programs, including the Department's Brownfields and RCRA Corrective Action & Closure programs. These programs are able to formally acknowledge the completion of any cleanup actions at 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

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

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1235 CENTRAL DRIVE, SKYWAY PARK
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