



Town of Warren

Code Enforcement Officer
Local Plumbing Inspector

R01-24-C-023

167 Western Rd
Warren ME 04864
Tel. (207) 273-2421
Fax (207) 273-3107

NARRATIVE INFORMATION SHEET

1) Applicant Identification

Town of Warren
167 Western Road
Warren, Maine 04864

2) Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,000,000.00

3) Location

- a. City: Warren
- b. County: Knox
- c. State: Maine

4) Property Information

Former Steamship Navigation Site
2287 Camden Road
Warren, Maine 04864

5) Contacts

- a. *Project Director*
Town of Warren Town Manager
Ms. Sherry Howard
167 Western Road
Warren, Maine 04864
manager@warrenmaine.org
(207) 273-2421
- b. *Chief Executive/Highest Ranking Elected Official*
Town of Warren Board of Selectman Chair
Mr. John G. Crabtree
167 Western Road
Warren, Maine 04864
(207) 273-2421

6) Population

Population per the 2020 census: approximately 4,865



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7) Other Factors

Other Factors	Page #
Community population is 10,000 or less.	Pages 1, 3, & 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 and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 3
The target area(s) is located within a community in which a coal-fired power plant was recently closed (2013 or later) or is closing.	N/A

8) Releasing Copies of Applications

Not applicable



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

November 1, 2023

Town of Warren
Attn: Sherry Howard
167 Western Road
Warren, ME 04864

Dear Sherry Howard:

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

The Town of Warren has developed an application requesting site-specific federal Brownfields Cleanup funding for the Steamship Navigation Site, located at 2287 Camden Road, Warren, Maine (Site).

The Department affirms that the Site:

- i. Is eligible to be enrolled in the Department’s voluntary response program;
- ii. Is not currently enrolled, but the Town of Warren intends to enroll the Site in the voluntary response program; and
- 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

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



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1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

- i. Overview of Brownfield Challenges and Description of Target Area:** Located in Maine's vibrant mid-coast region, the Town of Warren (Town) has been a meeting place for people in the state of Maine since it was established as a trading post as early as 1631. The Town was incorporated in 1776 and named for Dr. Joseph Warren, a revolutionist with ties to the area who was responsible for dispatching William Dawes and Paul Revere on their famous ride. Following incorporation, the Town held its first town meetings in 1777, built a school in 1785, established a post office in 1794, had the railroad come to Town in 1871, and established a library in 1900. In 1781, Amos Peters, born of African and Wampanoag Indian ancestry, was given 150 acres of land in Warren where he and his wife founded the Peterborough Settlement, one of the largest free Black communities in Maine. The area was populated by descendants of the original settlers until 1961. In 1853, Olive Rose was elected County Register of Deeds becoming the first woman to hold elected office in the United States. Each spring, since 1782, a weir is constructed in Town on the St. George River and thousands of alewives are funneled into waiting nets, a treasured resource for the Town. While this industry does not provide local employment, it has been a source of revenue since 1802, which was recently used to construct the Town fire station. In 2002, the Maine State Prison, a 900-bed maximum security facility, was moved to the Town from Thomaston, Maine. Present day Warren is a bustling bedroom community of just under 5,000 residents, including numerous descendants of the founding families.

Just off of Camden Road/Route 90 at 2287 Camden Road in Warren, Maine (Site) lies mountains of waste fiber, estimated at approximately 123,463 cubic yards of covered polyester waste material, 27,969 cubic yards of short paper fiber waste material, and 148,437 cubic yards of baled polyester waste material. These materials are the legacy of the former Steamship Navigation Company which intended to develop a firing range at the Site, using the waste materials as bullet stops and sound reduction berms. The intended use has since devolved into an environmental and legal nightmare. Placement and accumulation of waste fiber began in 1998, when former Site owners began accepting waste from Gates Formed-Fibre Products, Inc. under a permit from the Maine Department of Environmental Protection (MDEP). The amount of accepted waste quickly got out of hand. Litigation ensued beginning in 2001 and lasting until 2010, when the Town and the MDEP were able to reclaim \$545,525 from the former Site owners in a Supreme Court Case. The settlement has been held by MDEP and has been used to assist the Town in completing several site investigations to begin addressing Site issues. Throughout the legal process, the Town repeatedly voted not to foreclose on the property due to liability risks if the fiber material were to catch on fire. Then there were all the plans of what to do with the waste: take it off-site to a landfill, use it as fuel at a cement and concrete plant, take it off-site to fill a nearby quarry, continue down the path of a rifle range, converting it to composite lumber, running fuel tests on it to determine its value, or leave it there and turn the site into a quarry. While some of the waste was taken off-



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site to become composite lumber (only 1,000 of the promised and contracted 27,000 tons) and some waste was used as fuel at a cement and concrete plant (16 tons), both efforts ceased soon after they started as the material was found to be too difficult to handle and store. None of the other suggestions came to fruition either, due to one obstacle or another. And the press covered it all, including nationally with the Associated Press, all the way to the reporting of the jailing of the former Site owner as he continued to defraud others across the United States. All of this turmoil still leaves the Town stuck with mountains of waste.

On December 7, 2022, the Town foreclosed on the Site, after having waived the option to do so for the previous 23 years. A citizen committee had researched the matter for the year prior and recommended that the Town take control. With a release of liability by MDEP, the Town and MDEP worked to complete final characterization at the Site and set the Town up to apply for this grant over the summer of 2023. This cleanup grant funding would directly address the Town's most visible Brownfields Site, biggest eye sore, and environmental blight: several-stories high, piles of waste fiber found throughout the Site that pose a health risk due to the presence of elevated levels of per- and polyfluoroalkyl substances (PFAS) and arsenic, but are also a fire hazard and a detriment to use and/or development of the Site.

- ii. **Description of the Proposed Brownfield Site(s):** The Target Area consists of an approximately 60.3-acre parcel of land identified by the Town Tax Assessor's Office as Lot 38 on Tax Map 11. A legal description of the Site is recorded in the Knox County Registry of Deeds on Page 156 of Book 2189. The Town is the current owner and Steamship Navigation Co., Inc. is the former owner. The Site is currently developed with an approximately 4,000 square foot, one-story main building, a concrete block garage, and a metal-sided mobile home. These buildings will be demolished by the MDEP, following remedial actions to address the presence of lead surface contamination, asbestos-containing materials (ACM), and lead soil contamination. Large quantities of waste fiber from an automotive trim manufacturer were brought to the Site with the intention to use the material as bullet stops and berms around outdoor firing ranges associated with the former Site. Piles of this material are present throughout the Site. Based on the presence of the waste fiber, as well as findings of previous environmental investigations, identified contaminants of concern (COCs) at the Site include PFAS and arsenic associated with the piles of waste and surrounding soil. The Site has only ever been developed for use as a firearm sales business, with several associated firing ranges and associated side businesses (ammunition manufacturing and photographic laboratory). The former Site owners began accepting the waste in 1997 under an MDEP Solid Waste Beneficial Reuse Permit to act as bullet stops for outdoor firing ranges and to lessen the noise to neighboring properties.

b. Revitalization of the Target Area

- i. **Reuse Strategy and Alignment with Revitalization Plans:** The Town has been meeting and discussing plans for this Site for nearly 25 years. For various reasons, none of these plans have completely come to fruition and the Town is very ready to take this Site to the finish line. Our goal has always been to first address the environmental concerns of the Site, and the potential fire hazard that the mountains of uncovered waste pose. Many reuse plans have been



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discussed, but none have stuck, as we know that cleanup must occur first and funds needed to address the mountains are not within the Town's budget, nor were they available through other means when the Town did not own the Site. Many townspeople are frustrated with the slow progress of cleanup at the Site and are more than ready to close this out, including the citizen committee that was formed to research the situation and make recommendations to the Town, which led to the taking of the Site in 2022. This action opened doors to the Town as far as possible funding sources. At multiple Town meetings, reuse options have been discussed and the current most probable option is use of the Site by solar developers, once the Site has been cleaned up and wastes consolidated into large flat plateaus at the Site, perfect for solar development.

- ii. **Outcomes and Benefits of Reuse Strategy:** This proposed reuse strategy would first consolidate and cover the mountains of waste that are present at the Site. The waste itself is high in PFAS and arsenic, which is leaching into the surrounding soil and groundwater. Properly capping the waste and maintaining this cap will stop this leaching and prevent exposure to the waste and associated contaminants by Site users. It will also greatly reduce a large potential fire hazard at the Site caused by the uncovered waste. Beyond addressing the environmental hazards, consolidating and capping the waste will alleviate the giant eye sore aspect of the accumulated waste spread throughout the Site. Once the Site's environmental cleanup is complete, the Town will be free to sell or lease the property, and entertain other potential reuse options made possible by a clean environmental slate. The most interested parties in the Site have been solar developers, many of whom are installing solar panels throughout our great State and making use of properties that may otherwise be unusable, like landfills, or large flat plateaus of waste over a large plot of land.
- c. **Strategy for Leveraging Resources**
 - i. **Resources Needed for Site Characterization:** Based on assessment and characterization completed at the Site to date and the nature of the identified contaminants (PFAS in soil and PFAS and arsenic in waste), additional characterization is not anticipated.
 - ii. **Resources Needed for Site Remediation:** The requested funding from EPA will be sufficient to complete the necessary remedial actions recommended and conquered upon by MDEP. Qualified Environmental Professionals (QEPs) have thoroughly assessed outstanding environmental issues and specific remediation contractors have provided cost estimates to substantiate the requested amount.
 - iii. **Resources Needed for Site Reuse:** Both MDEP and the Town have been approached by developers, including solar developers, interested in the Site once environmental concerns are addressed. Upon completion of the Brownfields cleanup, the Town will be in a position to offer this large, well-located Site to developers and will not be in need of resources to facilitate Site reuse.
 - iv. **Use of Existing Infrastructure:** Future Site plans do not include use of any existing infrastructure at the Site. Three current structures are present at the Site, which are impacted by lead in soil, lead on surfaces, and asbestos containing materials in roofing. These structures



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and the surrounding impacted soil are to be addressed by MDEP, using the remaining funds from a settlement with the former Site owner.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need**

i. **The Community's Need for Funding:** The Town is a small, underserved community located in Knox County Maine which is often driven through and passed by on the way to nearby seaside communities with larger tax bases and more seasonal tourism revenue. The Town's tax base is dependent upon a population of slightly under 5,000 inhabitants with an average annual per capita income of \$29,709 (based on EPA's EJScreen). The Town's limited tax base and lack of available resources compound the community's need for financial support to address the environmental blight that has languished in our Town for almost 25 years. Without Brownfields Cleanup Funding, the Town cannot fund the necessary cleanup work at the Site. Reuse or redevelopment of the Site is unlikely without first cleaning up the Site and eliminating potential exposure pathways and hazardous substances that threaten human health and the environment.

ii. **Threats to Sensitive Populations**

1. ***Health or Welfare of Sensitive Populations:*** The Town's sensitive populations include the elderly, children, and low-income residents. This grant will significantly improve both the health and welfare of the target community as it will allow for cleanup and redevelopment of the Site, which will bring new jobs, an increased tax revenue, and an elimination of the health risks associated with the contaminants present at the Site. In Knox County, according to the *Knox County Health Profile, Maine Shared Community Health Needs Assessment, Revised 4/8/2022*, the median household income is slightly less (\$57,751) than the state median of \$57,918, but only after having climbed rapidly in the past five years; the county's unemployment rate (5.4%) is equal to the State's (5.4%); and individuals living in poverty (9.9%) are slightly fewer than the amount found throughout the State (11.8%). However, 17.5% of children in Knox County are living in poverty, which is higher than the amount found throughout the State (13.8%). Through EPA'S EJScreen, data for this region indicates the low-income socioeconomic indicator is in the 47th percentile for the State.

The Town has out-migration of young, working-aged people to often nearby, but often further afield locations, which results in an overall loss of business due to an unavailable workforce and an overall loss of services (healthcare and schools, most directly). The increasing cost of living has resulted in many locals unable to purchase property in their community.

2. ***Greater than Normal Incidence of Disease and Adverse Health Conditions:*** The *Knox County Health Profile, Maine Shared Community Health Needs Assessment, Revised 4/8/2022*, summarized the health status of Knox County, including the Town, as outlined below.

Health Statistics for Knox County			
	Knox County	Maine	U.S.
Drug overdose death per 100,000 population	40	37.3	21.5
Uninsured	9.4%	7.9%	9.2%



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All cancer deaths per 100,000 population	176.2	168.0	146.2
Lung cancer deaths per 100,000 population	40.2	45.5	33.4
Heart attack deaths per 100,000 population	28.2	25.4	25.5
Diabetes deaths per 100,000 population	17.4	22.5	21.6
Asthma (adults)	9.2%	11.7%	9.4%
Adult obesity	31.2%	29.1%	31.3%
Infant deaths per 1,000 live births	7.5	5.8	5.6
Food insecurity	11%	12.4%	12.9%
Lifetime depression	21.7%	23.7%	19.1%

The two contaminants of concern at the Site to be addressed by this grant are PFAS and arsenic. While the long-term health effects from exposure to PFAS are still being studied, epidemiological studies at the National Institute of Health have linked exposure to altered immune and thyroid function, liver disease, lipid and insulin dysregulation, kidney disease, adverse reproductive and developmental outcomes, and cancer. Removing and/or limiting exposure to these known contaminants will protect nearby residents and business owners, as well as future Site users, from life-threatening health impacts and will reduce the potential for contracting these diseases. According to the World Health Association, long-term exposure to arsenic from ingestion can cause cancer and skin lesions. It has also been associated with cardiovascular disease and diabetes. In utero and early childhood exposure is linked to negative impacts on cognitive development and increased deaths in young adults.

3. **Environmental Justice**

- a. **Identification of Environmental Justice Issues:** The Town is not located within a disadvantaged census tract according to the Climate and Economic Justice Screening Tool (CEJST). Environmental justice is a critical concern, and it is essential to address the disproportionate impact of environmental issues on our community. The following issues face the Town: 1) Energy Costs: Low-income Mainers bear a heavier energy burden, which could be alleviated through renewable energy policies and availability. 2) PFAS pollution: PFAS impacts have been found far and wide in Maine, impacting water, soil, farms, beef, milk, and more. 3) Landfills: Landfills are often situated in lower-income communities, exposing them to toxic groundwater, soil contamination, and ecosystem disruption. This impacts property values and local economic development. Maine faces an out-of-state waste issue due to a loophole that allows trash to cross the border into Maine, mix with local trash, and be counted as Maine trash. Approximately 40% of space in the state's largest landfill is occupied by out-of-state trash. 4) Access to the Legislative Process: Geographic location or technology constraints can hinder equal participation in sharing experiences and solutions. It is crucial to recognize that environmental injustices persist, and efforts toward equity and inclusion are essential for a healthier, more sustainable future.
- b. **Advancing Environmental Justice:** The planned cleanup project would advance environmental justice and minimize the displacement of residents and/or businesses among the underserved community of the Town by 1) eliminating the threat of exposure to PFAS and



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arsenic at the Site (mitigation of environmental hazards), 2) promoting green infrastructure both as a response to this Site as a whole, but also in the general community, 3) educating the community of the Site's impacts and intent of cleanup and redevelopment, and 4) providing accountability for the conclusion of a long-sought answer to the Site's environmental concerns. It is essential to continue advocating for environmental justice, protecting communities, and ensuring sustainable practices for a healthier Maine.

b. Community Engagement

i. Project Involvement and ii. Project Roles:

Name	Point of Contact (name, email, and phone)	Specific Involvement/Assistance
Town of Warren Town Manager	Sherry Howard manager@warrenmaine.org (207) 273-2421	Project planning, community outreach, public meetings
Town of Warren Board of Selectman	John G. Crabtree, Chair manager@warrenmaine.org (207) 273-2421	Public meetings
Town of Warren Finance Director	Heather Beaupre bookkeeper@warrenmaine.org (207) 273-2421	Financing
Town of Warren Legal Representative	William S. Kelly, Esq. Kelly & Associates, LLC (207) 338-2702	Consultation

iii. **Incorporating Community Input:** The basic framework of community involvement for this project is summarized in a draft Community Involvement Plan developed as part of the most recent work at the Site conducted through the MDEP. The Town will present goals, progress, opportunities for public participation, and the Town contact information for inquiries about the project on <https://warrenmaine.org/>. Local and regional newspapers (Bangor Daily News and the Courier Gazette) distributed throughout the community will be used to disseminate information, as well as on the Town's website. The Town will hold two public meetings when the project starts: the first to discuss the work plan and the second to provide updates as the project progresses. Remote/virtual meetings will be conducted if necessitated.

4. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

a. **Proposed Cleanup Plan:** The mitigation of the risk of human exposure to asbestos, lead surface contamination, and lead in soil identified at the Site will be addressed by the MDEP including the demolition of current on-site buildings and removal of lead-impacted soil. The addressment of PFAS in soil and PFAS and arsenic in accumulated solid wastes at concentrations exceeding their respective regulatory exposure limits is still to be addressed and is the subject of this grant application. PFAS have been identified in soil, predominantly in the southern portion of the Site. Concentrations of perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) exceeded the MDEP Soil Leaching to Groundwater



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Remediation Action Guidelines (RAGs) in several soil samples, some of which exceeded the MDEP Soil Park User, Construction Worker, and Commercial Worker RAGs. In general, concentrations of PFAS are highest downgradient of the bailed polyester waste material (uncovered) and the short paper fiber waste material (used as a cover) in the southern portion of the Site. The lateral extent and depth below ground surface of PFAS impacts in soil is not known; however, depth to bedrock throughout the Site is shallow and it is therefore theorized that PFAS impact would be within the small soil column from ground surface to bedrock.

Based on investigations completed to date, PFOS was detected above the MDEP Soil Leaching to Groundwater, Soil Park User, and Construction Worker RAGs in all waste types present at the Site, and above the above the MDEP Soil Commercial Worker RAGs within the short paper fiber waste material. PFOA was detected above the MDEP Soil Leaching to Groundwater RAGs in all waste types present at the Site, and above the MDEP Soil Park User and Construction Worker RAGs within the bailed polyester waste material and within the short paper fiber waste material. Additionally, in the three samples collected from the covered polyester material and in the three samples collected from the short paper fiber waste material, detected arsenic concentrations exceeded the MDEP Soil Leaching to Groundwater RAGs.

The expected receptors of PFAS and arsenic exposure throughout the Site are commercial workers employed at any future on-site buildings, future construction workers on-site for future site improvements, and/or general users of the Site.

To address these findings, the Town plans to consolidate the waste material present on-site, including removal of the material from the adjacent property to the south (identified as "Overlock Family Trust"; Book 2083, Page 249; Easement Area Appurtenant to Steamship Navigation Co., Inc. per Deed Book 2189, Page 156), and capping of PFAS impacted soil in conjunction with capping of on-site waste material. Consolidation and capping of impacted media using a cover system (e.g., clean fill) is a proven method of risk reduction. Confirmation sampling would be conducted to include collection of soil samples in areas where waste and soil were removed to confirm that soil to remain in place is below applicable RAGs. It is estimated that after consolidation, approximately 560,000 square feet of waste would need to be covered. This square footage includes extension of the capping material approximately five feet past the toe of the waste. It is anticipated that two feet of capping material will be needed, resulting in approximately 1,120,000 cubic feet of cover material being needed.

b. Description of Tasks/Activities and Outputs:

Task 1 – Cooperative Agreement Oversight

i. Project Implementation

EPA-funded tasks/activities: Sherry Howard, Town Manager and Grant Administrator, will supervise all activities with assistance from the Town's Board of Selectman, Finance Director, and attorney. In addition to oversight, this task will include procuring the services of a QEP. The QEP will prepare the Quarterly Reports, input and maintain data in ACRES, and support necessary grant documentation for submission to the EPA. Task 1 also includes enrollment in Maine's Voluntary Response Action Program (VRAP).



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ii. **Anticipated Schedule:** 1. Oversight will be provided for the grant term (October 2024 through September 2028). 2. A QEP will be hired within three months of the grant award and will enter data into ACRES (December 2024 through December 2027). 3. A VRAP Application will be submitted by February 2025.

iii. **Task Activity Lead:** Town Manager and QEP

iv. **Outputs:** ACRES updates; quarterly and closure reports; QEP contract; one VRAP application; and one grant closure report

Task 2 – Community Outreach & Engagement

i. **Project Implementation**

EPA-funded tasks/activities: To ensure the community is informed of redevelopment progress and has an opportunity to provide feedback and express concerns, the Town and the QEP will hold at least two public meetings: the first to discuss the work plan and the second to provide updates as the project progresses. Verbal and written comments made during this meeting and responses will be posted on the Town’s website. The Town will also develop and post printed documents, photographs, and other outreach materials for print and website use to provide information on cleanup and reuse progress.

ii. **Anticipated Schedule:** Public Meetings – January 2025 and July 2025; Postings – October 2024 through December 2026

iii. **Task Activity Lead:** Town Manager and QEP

iv. **Outputs:** Two public meetings and 12 additional postings including responses to public comments

Task 3 – Cleanup Oversight

i. **Project Implementation**

EPA-funded tasks/activities: Our QEP will finalize the ABCA, Remedial Action Plan (RAP), contractor bidding documents, oversee the cleanup, and complete final closeout reporting. To ensure public participation, documents will be available for public comment prior to finalization. Our QEP will additionally provide technical support for community outreach.

ii. **Anticipated Schedule:** 1. ABCA finalization January 2025, 2. RAP finalization March 2025, 3. Publish bidding documents April 2025, 4. Begin Cleanup June 2025, 5. Final Report December 2026

iii. **Task Activity Lead:** QEP with support from Town Manager

iv. **Outputs:** Finalized ABCA, RAP, bid documents and resultant bids, comments and responses, and close-out report

Task 4 – Cleanup

i. **Project Implementation**

EPA-funded tasks/activities: Cleanup contractors will use federal procurement rules to complete the needed work and will proceed in accordance with the ABCA, RAP, and bid specifications, as reviewed and approved by MDEP and EPA. MDEP VRAP requirements will additionally be fulfilled. The QEP will supervise on-site cleanup and produce the final report.



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- ii. **Anticipated Schedule:** 1. Hire cleanup contractor May 2025, 2. Begin Cleanup June 2025, 3. VRAP Completion September 2025, 4. Final report December 2026.
- iii. **Task Activity Lead:** QEP with support from Town Manager
- iv. **Outputs:** One cleanup contract, one site cleanup, final cleanup report, and one VRAP certificate

c. **Cost Estimates:** We have consulted an experienced QEP that has worked on this Site to determine the following costs.

Task 1: Cooperative Agreement Oversight – Town of Warren personnel (\$50/hr. x 70 hrs. = \$3,500). QEP time at (\$165/ hr. x 80 hrs. = \$13,200) to assist in reporting, ACRES updates, and VRAP application. **Task 2:** Community Outreach & Engagement – Town of Warren personnel (\$50/hr. x 70 hrs. = \$3,500), QEP time (\$165/hr. x 50 hrs. = \$8,250) to assist with community outreach, and supplies and publication costs for outreach (\$1,500). **Task 3:** QEP time for cleanup oversight, confirmation sampling, and assist/complete ABCA, RAP, Bid Documents, and Cleanup Report (\$165/hr. x 275 hrs. = \$45,375 + confirmation sampling cost (\$25,000) = \$70,375). **Task 4:** Cleanup - Cleanup contractor prepares site, consolidates waste, and obtains and places cover material (\$1,899,675).

Budget Categories		Project Tasks				Total
		<i>Task 1 Cooperative Agreement Oversight</i>	<i>Task 2 Community Outreach & Engagement</i>	<i>Task 3 Cleanup Oversight</i>	<i>Task 4 Cleanup</i>	
Direct Costs	Personnel	\$3,500.00	\$3,500.00	\$0.00	\$0.00	\$7,000.00
	Fringe Benefits	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	Travel	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	Supplies	\$0.00	\$1,500.00	\$0.00	\$0.00	\$1,500.00
	Contractual	\$13,200.00	\$8,250.00	\$70,375.00	\$1,899,675.00	\$1,991,500.00
	Other	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Direct Costs		\$16,700.00	\$13,250.00	\$70,375.00	\$1,899,675.00	\$2,000,000.00
Indirect Costs		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Budget (Total Direct Costs + Indirect Costs)		\$16,700.00	\$13,250.00	\$70,375.00	\$1,899,675.00	\$2,000,000.00

d. **Plan to Measure and Evaluate Environmental Progress and Results:** The Town and its QEP will formulate a calendar/checklist to track, measure, and evaluate progress. We will list all tasks, projected outputs for each task, and the anticipated schedule needed to ensure we fulfill the goals of the project. Outputs and our development goals will be on this calendar.



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During monthly meetings during project implementation, the Town and the QEP will evaluate each task and schedule milestones to determine if adjustments need to be made. We are planning to complete the work associated with the grant within 1.5 years. We will also track progress through ACRES and quarterly reporting. We will seek feedback from the community and provide them with opportunities to comment on the schedule.

5. **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

a. **Programmatic Capability**

i. **Organizational Structure and ii. Description of Key Staff:** The Town has waited nearly a decade to make any real progress at this Site and the Town Manager, Board of Selectman, and general Town inertia is behind getting this Site cleaned up and usable again. The Town Manager, Sherry Howard, has 26 years of service with the Town and fills many positions including Treasurer, Tax Collector, Road Commissioner, and General Assistance Administrator. Sherry has and will continue to spearhead this project for the Town. Each member of the Board of Selectman has deep ties to the Town and a strong commitment to the Town's prosperity and growth. Currently, the Board of Selectman meet every other Wednesday at 6:15 pm in the Town Office Meeting Room.

iii. **Acquiring Additional Resources:** The Town will hire a QEP in accordance with federal procurement requirements, including the advertisement of a Request for Qualifications. The Town will follow Federal Procurement procedures when appropriate and use a purchase policy to govern day-to-day operations. The Town will seek the assistance of additional needed parties (engineers, lawyers, etc.) as needed. It is not anticipated that additional monetary resources beyond the grant-funded cleanup will be needed. Once cleanup is complete, the Site will be available to developers, who will fund their own projects for potential development of the Site.

b. **Past Performance and Accomplishments**

ii. **Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements**

1) ***Purpose and Accomplishments:*** The Town received \$512,197 from the Federal government's American Rescue Plan, which delivered relief to those eligible during the global COVID-19 pandemic. These monies were allocated to Town Staff for their dedication and hard work during the pandemic and was additionally voted to be used for repair/replacement of a culvert in Town.

2) ***Compliance with Grant Requirements:*** The Town staff spent many hours dedicated to learning how these funds from the American Rescue Plan could be spent. The Town adhered to appropriate uses, schedules, and terms and conditions under this award, filling appropriate documentation as required by the Federal government.



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THRESHOLD CRITERIA RESPONSE CLEANUP GRANT PROPOSAL

III.B. Threshold Criteria for Cleanup Grants

Section III.B.1. - Applicant Eligibility

The grant applicant, the Town of Warren, is a general purpose unit of government, as defined by EPA in 2 CFR § 200.1.

Section III.B.2. - Previously Awarded Cleanup Grants

The Town has never received, or been previously awarded, EPA Brownfields Cleanup Grant funding.

Section III.B.3. - Expenditure of Existing Multipurpose Grant Funds

The Town has never received, or been previously awarded, EPA Brownfields Cleanup Grant funding.

Section III.B.4. - Site Ownership

The Site owner is the Town of Warren. The previous Site owner was Steamship Navigation. In late 2022, the Town foreclosed on the Site and is now the Site owner. A legal description of the Site is recorded in the Knox County Registry of Deeds on Page 156 of Book 2189.

Section III.B.5. - Basic Site Information

- a) Site Name – Former Steamship Navigation Site
- b) Site Address – 2287 Camden Road, Warren, Maine 04864

Section III.B.6. - Status and History of Contamination at the Site

- a) **Hazardous Substance and/or Petroleum Contamination:** The Site is contaminated with arsenic (hazardous substance) and PFAS (yet to be determined hazardous substance). The Site is not contaminated with petroleum or petroleum product.
- b) **Operational History and Current Use of the Site:** The Site consists of an approximately 60.3-acre parcel of land which is identified by the Town Tax Assessor's Office as Lot 38 on Tax Map R11. The Site is currently developed with an approximately 4,000 square foot, one-story main building, concrete block garage, and metal-sided mobile home. The main building was used as an indoor firing range (IFR), a firearms retail store, and a photographic laboratory. Several outdoor firing ranges (OFRs) were identified throughout the Site. A large quantity of waste fiber from an automotive trim manufacturer was brought to the Site with the intention to use the material as a backstop in the OFR(s) and is present in large piles throughout the Site. As a portion of its use as a firearm sales business (R.D. Outfitters), several firing ranges were developed on the Site. The IFR was located within the main building, in the southern portion of the building. Several OFR locations were identified throughout the Site, including:



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- Directly behind the on-site building to the south.
- East of the on-site building within the horseshoe shaped berm of covered polyester waste material.
- Within the baled polyester waste material berms in the southeast corner of the Site.
- Within the baled polyester waste material berms on the west side of the Site.
- One historically identified, but not field verified by Haley Ward, Inc. (Haley Ward), at the southern boundary of the Site, potentially off-site.

To lessen the sound of the shooting range and to absorb ammunition fragments, the former owner began accepting waste material from Gates Formed-Fibre in Auburn, Maine in 1997 to create berms with this material. The MDEP approved the use of fiber material in a Solid Waste Beneficial Reuse Permit issued in 1997. The material consists of a non-woven fabric used in the manufacturing of automobile trunk liners. The berms are in various stages of completion, ranging from uncovered to completely covered with soil and vegetation. It is unknown if the berms, used as bullet stops, were ever cleaned to remove spent bullets and associated fragments. The MDEP did require that spent bullets and associated fragments be collected annually as a condition of the 1997 MDEP Solid Waste Beneficial Reuse Permit.

A small room within the main building appears to have been used for the manufacture of small quantities of ammunition, based upon the presence of tools and supplies associated with this practice, including several lead ingots. According to previous Site investigations, this room was also used as a photographic laboratory for the development of school photographs. MDEP records indicate that approximately 20 rolls of black and white film were processed in this laboratory on a yearly basis with on-site silver recovery. Documentation of this process and the removal of the actual silver recovery units at the end of the laboratory's usage could not be verified during previous investigations.

- c) **Known Environmental Concerns:** Based on the presence of the waste fiber and the firing ranges, as well as findings of previous environmental investigations, identified COCs at the Site include PFAS, lead, and arsenic. ACM in the form of asphalt roofing shingles was identified on the exterior of the concrete block garage, making asbestos an additional COC.

The MDEP will address the lead and ACM COCs at the Site with funds remaining from a settlement with the former Site owner. The PFAS and arsenic COCs remain to be addressed, which are the subject of this grant application.

- d) **How the Site Became Contaminated and the Nature and Extent of the Contamination:** Placement and accumulation of waste fiber began in 1998, when former site owners began accepting waste from Gates Formed-Fibre Products, Inc. under a permit from MDEP. Identified PFAS impacts are highest downgradient of the baled polyester waste material and the short paper fiber waste material in the



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southern portion of the Site, which are uncovered waste materials. The lateral extent or depth below ground surface of PFAS impact in soil is not known; however, depth to bedrock throughout the Site is shallow and it is therefore theorized that PFAS impact would be within the small soil column from ground surface to bedrock. Elevated PFAS concentrations are present in both the waste itself and in nearby soil. Elevated concentrations of arsenic were additionally identified within the on-site waste. The waste is present throughout the Site, with some waste placed on adjacent property to the south, and has been identified as the source of the PFAS and arsenic contamination on-site.

Section III.B.7. - Brownfield Site Definition

- a) The site is not listed or proposed for listing on the National Priorities List;
- b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into parties under CERCLA; and,
- c) The site is not subject to the jurisdiction, custody, or control of the U.S. government.

Section III.B.8. - Environmental Assessment Required for Cleanup Grant Applications

Several previous environmental investigations have occurred on the Site. These investigations are summarized in the following list. Copies of each report can be found on MDEP's Division of Remediation Online Remediation Site Documents portal utilizing the Site's assigned remediation site ID REM02868.

Compliance Costs Assessment of Steamship Navigation Company's Proposed RD Outfitters Shooting Range in Warren, Maine: On May 29, 2003, E/Pro completed a report to determine the cost of a proposed shooting range, as well as to bring the Site into compliance for the beneficial reuse of the fiber material under the MDEP Solid Waste license. E/Pro estimated that construction of a 250-meter range with the on-site use of the fiber material would cost \$2,977,000, while off-site disposal of the fiber material to a licensed landfill would cost \$3,043,000.

2007 Phase I ESA: Summit completed a Phase I ESA for the Site dated July 27, 2007. The following RECs, Historical RECs (HRECs), and/or *de minimis* conditions were identified in connection with the Site:

1. Fiber materials from Gates Formed-Fibre were brought to the Site for use in the construction of sound reduction and bullet stop berms. Approximately 254,000 square feet (SF) of fiber was present on the Site. The presence of this material was currently in violation with the conditions of the MDEP's Solid Waste License #S-21758-WL-A-N.
2. Photographic chemicals were disposed of to the on-site septic tank during the operation of a photographic laboratory on the Site.



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3. An IFR was operated inside of the on-site Building. Contamination associated with this usage, including lead dust and bullet fragments, may be present within the IFR.
4. The operation of OFRs on-site may have resulted in the presence of lead contaminated soils and bullet fragments within the range area and in the bullet stop berms.
5. Ammunition manufacturing within the room of the Office Building may have resulted in the presence of lead contamination, associated with the melting of lead ingots, on the surfaces within this room.

Based on the results of the Phase I ESA, Summit presented the following recommendations for the Site:

1. Perform a Phase II ESA, including a subsurface investigation of soil in areas within the (then identified) OFR at the Site, as well as laboratory analysis of groundwater samples collected from on-site monitoring wells to determine if former Site activities (firing range and photo lab) have impacted Site soil and groundwater.
2. Due to on-site usage of photo-chemicals, lead, and solvent-based cleaners, a water sample was recommended to be collected from the water supply well at the Site for laboratory analysis of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and total Resource Conservation and Recovery Act (RCRA) metals.
3. Prior to reuse of the on-site Building, lead sampling was recommended to be performed to determine if the building was suitable for habitation.
4. Summit recommended that a plan for the finalization of the Gates fiber berms be submitted to the MDEP's Solid Waste Bureau to address the violations incurred by Steamship Navigation.
5. Summit recommended that the future property owner apply to the MDEP VRAP.

2007 Phase II ESA: Summit completed a Phase II ESA for the Site dated October 29, 2007. Investigative activities included the following:

1. Advancement of 12 soil borings and the installation and development of two monitoring wells to characterize groundwater at the Site.
2. Collection of groundwater samples from each of the two temporary monitoring wells installed at the Site.
3. Collection of one sample from the on-site drinking water well.
4. Collection of 17 lead wipe samples to determine whether impacts were present within the Office Building.
5. Collection of one soil sample from one of the 12 soil borings advanced at the Site.
6. Collection of six surficial soil samples at the Site.
7. Screening of soil samples collected on-site with an XRF device to determine total metals levels.

Elevated concentrations of lead, above the MDEP RAGs for the Outdoor/Construction Worker, were identified in four of the seven soil samples submitted for laboratory analysis. Soil



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samples with elevated lead concentrations were all collected from the area surrounding the IFR. In addition, arsenic concentrations above the Outdoor/Construction Worker RAGs were identified in three of the seven soil samples submitted for analysis. Groundwater analytical results from the two temporary monitoring wells and the on-site water supply well did not report concentrations of any metals, VOCs, or SVOCs at concentrations above the Maximum Exposure Guidelines (MEGs).

Based on the results of the Phase II ESA, Summit presented the following recommendations for the Site:

1. Apply to the MDEP VRAP to obtain a release of liability for the property.
2. If the main building is to be reused, a thorough cleaning/ decontamination will be required for the entire building to remove lead debris and lead dust to allow for occupancy.
3. If the main building is to be demolished, lead fragments should be removed from the backstop and a sample of the concrete backstop within the IFR should be collected to determine if leachable lead exists within it.
4. Encapsulate or remove and properly dispose of lead-impacted soils above the MDEP RAGs for Outdoor/Construction Worker.
5. Prior to renovation/demolition of the buildings, an ACM survey should be performed.
6. Hazardous materials (paints, lead ingot, spent shells, live shells, etc.), Universal Waste, and petroleum products should be removed from the Site and disposed of properly.
7. Although the fiber bales do not present a contaminant risk, they present a regulatory challenge, as well as a potential fire hazard. Therefore, the bales should be removed or covered as initially permitted by the MDEP Solid Waste Division.

2018 Phase I ESA: Beacon completed a Phase I ESA for the Site dated June 5, 2018.

The following RECs were identified in connection with the Site:

1. The property was listed in 2007 as a Solid Waste Facility with licenses held by Steamship Navigation and Cascade Fiber.
2. Past usage of the property as a firing range, photographic lab, and solid waste dumping of fiber bales.
3. Past environmental reports indicated environmental issues with the property.
4. Lead dust and small quantities of hazardous substances are present within the Site structure.
5. Significant lead dust and bullet fragments are present within the Site structure based on past sampling and analysis. Additional sampling should be performed to determine disposal options.
6. A sump is located within the IFR. No pump was present, and the discharge of this sump is not known.



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7. Significant solid waste dumping of fiber bales has occurred on the property. Additionally, a landfill of these bales was established to the northeast of the Site structures in the late 1990s.
8. Distressed vegetation was observed in areas of bales of fiber.

The following data gaps were identified by Beacon in connection with the Site:

1. Location/presence of a septic leach field associated with the septic tank is unknown.
2. Due to the unsafe nature of the roof of the garage, this structure was not entered.
3. Dates of the photographic laboratory's operations on the Site could not be specifically identified.

Based on the results of the Phase I ESA, Beacon presented the following recommendations for the Site:

1. A Phase II ESA should be completed on the property as follows:
 - a. To determine the potential presence of ACM;
 - b. To determine the potential presence of lead-based paint (LBP);
 - c. To determine lead concentrations within the firing range (including the backstop);
 - d. To determine the location/presence of a septic leach field and whether impacts are present within it; and
 - e. Additional soil samples should be collected to determine potential impacts from past use of the Site.
2. A plan should be developed to either complete the covering of the fiber bales or to have the bales removed to comply with past MDEP Notices of Violations (NOVs).

2018 PFAS Investigation: On May 10 and 11, 2018, the MDEP collected soil, pore water, and drinking water samples at the Site for PFAS analysis as part of an ongoing department investigation of potential PFAS sites in the State of Maine. The investigation included the collection of 13 soil samples, six pore water samples, and one water sample from the on-site drinking water well. Results of the investigation identified four soil samples and four pore water samples as containing PFAS in exceedance of the 2018 MDEP RAGs.

In addition to the collection of analytical samples, a borehole geophysical survey was performed for the on-site well by Northeast Geophysical Services, Inc. (NGS) on May 10, 2018. The well is located immediately adjacent to the west side of the former retail business structure and was found to be 102 feet in depth with approximately 20 feet of overburden casing installed. The depth to water was measured at 5.36 feet below the top of casing (TOC) at the time of the survey. The well was logged for fluid temperature, fluid resistivity, borehole caliper, optical and acoustic televiwer, and heat pulse flowmeter.



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Results indicated a likely transmissive zone (zone contributing to water in the well) from 33 to 35 feet below TOC with a possible transmissive zone from 91 to 94 feet below TOC. Information from the borehole caliper and heat pulse data under pumping conditions indicated that the shallow interval (33 to 35 feet below TOC) was most likely the interval with the greatest contribution of water to the well.

2018 Phase II ESA: In August and September of 2018, CES conducted a Phase II ESA on behalf of the MDEP for the Site, which included the following investigative activities:

1. Performed ground-penetrating radar (GPR) surveying to determine depths to bedrock in areas of interest within the Site.
2. Advanced 10 soil borings via direct push technology (DPT) at 10 locations.
3. Collected a total of 16 soil samples, and one duplicate, from soil borings advanced at the Site.
4. Installed and developed temporary monitoring wells at two DPT locations.
5. Sampled overburden groundwater at one temporary microwell location to characterize groundwater quality.
6. Completed multi-increment sampling (MIS; i.e., composite sampling) in the vicinity of the three waste types at the Site, including baled fiber material, papermill short paper fiber, and covered polyester fiber material.
7. Performed XRF screening for lead at locations adjacent to Site buildings.
8. Collected seven soil samples for RCRA 8 metals analysis in areas screened using the XRF.

GPR data collection did not result in the identification of anomalous conditions within surveyed portions of the Site, with bedrock ranging between 0 and 2.5 feet below ground surface (bgs). Depth to bedrock, as interpreted in the field, generally correlated with encountered depths to bedrock from DPT soil boring locations; however, borings located to the southwest of the Site (DPT-01 and DPT-02) varied in depths to bedrock from those interpreted from GPR records. This is believed to be due to variations in bedrock depths along the west and southwest of the Site and visual evidence for the use of baled waste material under access roads. Exposed bedrock was located to the east of the roadway with encountered depths to bedrock in DPT-01 and DPT-02 (located west) being eight feet bgs and 13.9 feet bgs, respectively.

A total of 10 soil borings was completed using DPT, resulting in a total of 16 soil samples being submitted for PFAS analysis. Each boring was completed to refusal, which was encountered at depths ranging from ground surface (DPT-04) to 14 feet bgs (DPT-02). Detected concentrations of PFOS, PFOA, and perfluorobutane-sulfonic Acid (PFBS) were below the leaching to groundwater criteria as contained in the MDEP *Maine RAGs for Sites Contaminated with Hazardous Substances* (MDEP, 2018).



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Two temporary microwells were installed within DPT borings where water was encountered; however, only one microwell (TW-2) contained sufficient water for sampling following development. A groundwater sample from TW-2 was submitted to Vista Analytical Laboratory (Vista) for analysis of PFAS. Analytical results indicate that PFOS and PFOA were detected at concentrations 88.0 ng/L and 88.6 ng/L, respectively, which are above the Maine Center for Disease Control (MECDC) MEG of 70 nanograms per liter (ng/L). These results are consistent with the results obtained by MDEP in a porewater sample (PW-1) collected 600 feet south of TW-2 in May 2018.

Composite soil samples from MIS activities were submitted for analysis of PFAS and included a sample and associated replicate from a 0- to 10-foot distance from the base of waste material (Zone A), and a sample located 10 to 20 feet from the base of waste material (Zone B). Samples from Zone A (primary and/or replicate sample) and Zone B associated with baled material and short paper fiber detected PFOS at a concentration above the RAGs; however, detected concentrations of PFOA and PFBS were below applicable RAGs. PFAS concentrations in Covered Waste (CW) samples were reported as below the detection limit (DL) for the three PFAS compounds with applicable soil RAGs (PFOA, PFOS, and PFBS).

Exterior surfaces of the IFR and soils adjacent to these exterior surfaces were screened with an XRF for the presence of lead at 30 locations (IFR-1 through IFR- 30) proximate to four openings to the IFR. Confirmatory laboratory soil samples were collected from four of the 30 locations (IFR-4, IFR-5, IFR-17, and IFR-27) and were sent to Alpha Analytical, Inc. (Alpha) for laboratory analysis of total lead. Three of the four analytical samples collected near the IFR were above the construction worker RAGs for lead (450 milligram per kilogram [mg/kg]). A total of 36 locations (TR-1 through TR-36) were field-screened using an XRF near the on-site mobile home trailer, having been previously used in processing of photographic film, with two soil samples subsequently submitted to Alpha for lead analysis. Neither sample collected from the areas surrounding the trailer exceeded the RAGs for lead. The area around a spent ammunition lead pile was screened with an XRF for the presence of lead at 18 locations (LP-1 through LP-18). The screening locations were positioned to account for surface water flow across exposed bedrock and visible spent lead fragments. One confirmatory soil sample (LP-13B) was collected and submitted to Alpha for the laboratory analysis of total lead. Lead was reported in this area at a concentration of 9,760 mg/kg, which is approximately 20 times the current construction worker RAGs.

2022 Phase I ESA: Beacon completed a Phase I ESA for the Site dated December 2, 2022. The following RECs were identified in connection with the Site:

1. The property was listed in 2007 as a Solid Waste Facility with licenses held by Steamship Navigation and Cascade Fiber.



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2. Past usage of the property as a firing range, photographic lab, and solid waste dumping of fiber bales.
3. Past environmental reports indicated environmental issues with the property.
4. Lead dust and small quantities of hazardous substances are present within the Site structure.
5. Significant lead dust and bullet fragments are present within the Site structure based on past sampling and analysis. Additional sampling should be performed to determine disposal options.
6. A sump is located within the IFR. No pump was present, and the discharge of this sump is not known.
7. Significant solid waste dumping of fiber bales has occurred on the property. Additionally, a landfill of these bales was established to the northeast of the Site structures in the late 1990s.
8. Distressed vegetation was observed in areas of bales of fiber. Soil samples collected by CES indicated elevated concentrations of PFAS in these areas.

The following *de minimis* conditions were identified by Beacon in connection with the Site:

1. The on-site drinking water well was documented to contain elevated concentrations of lead. A treatment system was observed in the basement of the southern building.
2. Based on the age of the structures, ACM may be present. A survey should be completed prior to renovation or demolition.
3. Based on the age of the structures, LBP may be present. A survey should be completed prior to renovation or demolition.

Based on the results of the Phase I ESA, Beacon presented the following recommendations for the Site:

1. A Phase II ESA should be completed on the property as follows:
 - a. To determine the potential presence of ACM;
 - b. To determine the potential presence of LBP;
 - c. To determine lead concentrations within the firing range (including the backstop);
 - d. To determine the location/presence of a septic leach field and whether impacts are present within it; and
 - e. Additional soil samples should be collected to determine potential impacts from past use of the Site.
2. A plan should be developed to either complete the covering of the fiber bales or to have the bales removed to comply with past MDEP NOVs.
3. Potential property owners should apply to the MDEP's VRAP to obtain liability protections afforded by Maine law.



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2023 Phase II ESA: Haley Ward completed a Phase II ESA for the Site in September of 2023. The following is a summary of findings based on areas investigated:

AOC 1 – Potential Hazardous Building Materials: The findings of the investigation completed for this AOC were discussed in a separate Hazardous Building Materials Survey (HBMS) report (see below).

AOC 2 – Site-wide: Based on investigations completed at the Site to date, PFAS have been detected in soil and groundwater throughout the Site, with elevated concentrations of PFAS found primarily in the southern portion of the Site. This conclusion was further supported by this Phase II ESA investigation. Laboratory analysis for the presence and concentration of PFAS was completed for soil samples collected from 12 soil borings advanced throughout the Site. PFAS was detected in soil borings SB-101, SB-102, SB-106 through SB-110, and SB-112. Concentrations of PFOS and PFOA exceeded the MDEP Soil Leaching to Groundwater RAGs in several of the collected soil samples, and some exceeded the MDEP Soil Park User, Construction Worker, and Commercial Worker RAGs. In general, concentrations of detected PFAS appear to be highest downgradient of the bailed polyester waste material and the short paper fiber waste material in the southern portion of the Site.

AOC 3 – Potential Lead-Impacted Areas: Based on field screening results with the XRF analyzer during this investigation, the minimum and maximum total lead concentrations detected in soil throughout the four locations screened were 20.66 and 30,436 mg/kg, respectively. In the vicinity of the horseshoe OFR, lead concentrations appear to be highest on the eastern side of the backstop but decrease as one steps out from the backstop feature. In the vicinity of the OFR located directly south of the on-site building, lead was detected with the XRF analyzer; however, this impact appears to be limited to the immediate vicinity of the backstop. In the vicinity of the on-site lead pile, lead concentrations were highest in the center of the identified pile and decreased as one stepped out from the central pile location. In the vicinity of the exterior of the IFR, the highest lead concentrations appear to be present in line with a ventilation fan located on the building (west side) and at an entry door to the building (east side). These concentrations also decreased with distance away from the building. The total lead impact in all four areas screened was delineated to concentrations below the MDEP RAGs for Commercial Worker exposure (440 mg/kg).

Within each of the four screened areas, representative surficial TCLP lead soil samples were collected to determine the mobility potential of lead in soil encountered and the soils' hazardous waste classification. Based on laboratory analysis, soils in the vicinity of the horseshoe OFR, in the vicinity of the on-site lead pile, and in the vicinity of the exterior of the IFR would be considered hazardous.



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AOC 4 – Septic Tank/Leach Field: Using the services of ProMark Utility Locating, Inc., a ground penetrating radar (GPR) survey was completed to identify the location of the septic tank and leach field associated with the on-site building. The GPR survey did not identify evidence of these features within the area previously identified as the septic system location, nor did it identify evidence of piping leading from the on-site building to a system. As the septic tank was not located, a sample of the contents was not collected. A soil sample and groundwater sample were collected in the area of the previously identified septic system. PFOS and arsenic were detected in the soil sample at concentrations above the MDEP Soil Leaching to Groundwater RAGs. Concentrations of PFAS and metal compounds were detected in the groundwater sample, but none were above the MDEP Groundwater Construction Worker RAGs. Based on these results, it does not appear that a pathway for contamination is present in this location, as the detected compounds are likely associated with nearby waste (PFOS) or are naturally occurring (arsenic). Should the on-site building be used in the future, additional investigation as to the wastewater disposal system is recommended.

2023 HBMS: Haley Ward completed an HBMS at the Site in September of 2023. The assessment was completed to identify and assess ACM and Polychlorinated Biphenyl (PCB)-containing building materials at the Site that would require special handling and disposal or would be regulated prior to or during the planned demolition of the structures. ACM was identified in the black asphalt shingles found to be present on the Site garage building (Out Building).

Section III.B.9.b. - Site Characterization

- i. The Town is eligible to be enrolled in the MDEP VRAP.
- ii. The Town is not currently enrolled in the VRAP but intends to be enrolled upon receipt of funding.
- iii. The Town has a sufficient level of Site characterization from ESAs performed to date for remediation work to begin.

An acknowledgement letter attesting to these conditions was prepared by Chris Redmond of the MDEP and submitted to Christine Lombard of USEPA Region 1 on November 1, 2023. This letter is additionally attached.

Section III.B.10. - Enforcement or Other Actions

The MDEP approved placement of the waste material on the Site in a Solid Waste Beneficial Reuse Permit issued in 1997. The MDEP did require that spent bullets and associated fragments be collected annually as a condition of the Permit. On April 5, 2001, the State of Maine and MDEP filed a Complaint against The Steamship Navigation Company, seeking injunctive relief and civil penalties for violations of Maine statutes, regulations, and orders of MDEP related to the waste placed on the Site. This Complaint resulted in a Consent Order,



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which ordered The Steamship Navigation Company to complete a list of 15 items, inclusive of not accepting any further waste at the Site, allowing MDEP and the Town to enter the Site, and the reimbursement of MDEP and the Town for cleanup costs. This enforcement action is complete and there are no known ongoing or anticipated environmental enforcement or other actions related to the Site.

Section III.B.11. - Sites Requiring a Property-Specific Determination

We have reviewed Section 1.5 in the Information on Sites Eligible for Brownfields Funding under CERCLA 104k and confirmed that a Property-Specific determination is not required.

Section III.B.12. - Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. Exemptions to CERCLA Liability

3. *Property Acquired Under Certain Circumstances by Units of State and Local Government*

- a. Circumstances:** The Site was acquired by the Town primarily because of the tax delinquency, which went unpaid by former Site owners for 23 years. The Site has been abandoned by the former owner since the late 1990s. On April 5, 2001, the State of Maine and MDEP filed a Complaint against The Steamship Navigation Company, seeking injunctive relief and civil penalties for violations of Maine statutes, regulations, and orders of MDEP related to the waste placed on the Site. This litigation lasted until 2010.
- b. Date Acquired:** On December 7, 2022, the Town voted to foreclose on the Site, after having waived the option to do so for the previous 23 years.
- c. Hazardous Substance Disposal:** The disposal of hazardous substances at the Site occurred before the Town took possession of the property.
- d. Cause Affirmation:** The Town has never caused or contributed to any release of hazardous substances at the Site.
- e. Arrangement Affirmation:** The Town has never, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

Section III.B.13. - Cleanup Authority and Oversight Structure

- a) Cleanup Oversight:** The Town will contract with a QEP to oversee the cleanup process and will retain qualified remedial contractors to perform the work. The Town anticipates hiring a QEP within three months of the grant award to assist with all aspects of the cleanup process including, but not limited to, public outreach, technical reporting, procurement, oversight, ACRES reporting, MDEP Voluntary Response Action Program (VRAP) application, and regulatory agency communication. The QEP will be selected based on a



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Request for Qualifications process consistent with the applicable competitive procurement provisions. The selected QEP will work with the Town to complete cleanup. Cleanup oversight will also be provided by State authorities as the Former Steamship Navigation Site will be enrolled in MDEP VRAP.

- b) Plan to Acquire Access to Adjacent Properties:** The land surrounding the Site is currently, and has historically, been used for residential and commercial uses, with the majority of the surrounding properties being undeveloped. Camden Road/Route 90 is located to the north of the Site, beyond which is Viking Hardscapes, a building supply store. East of the Site is residential, commercial (Maine-Ly Concrete Corporation), and undeveloped property. South of the Site is undeveloped property. West of the Site is On the Road, a utility trailer dealer, and undeveloped property.

Part of the cleanup plan is the removal of waste material from the adjacent property to the south (identified as "Overlock Family Trust"; Book 2083, Page 249; Easement Area Appurtenant to Steamship Navigation Co., Inc. per Deed Book 2189, Page 156), which will require permission from the landowner to access. A Town representative will personally contact this adjacent landowner, and others, before work begins to negotiate any appropriate conditions and access to these properties.

Section III.B.14. - Community Notification

- a) Draft Analysis of Brownfields Cleanup Alternatives (ABCA)**

A draft ABCA was prepared by Haley Ward as part of the work recently conducted through the MDEP, and funded by a settlement with the former Site owner. The ABCA was reviewed by MDEP personnel and was determined to appropriately summarize Site conditions, contamination issues, cleanup standards, and applicable regulations. Cleanup alternatives were presented in the ABCA that discussed such factors as effectiveness, implementability, resilience to climate change, cost, and reasonableness. A copy of the draft ABCA has been attached to this submittal.

- b) Community Notification Ad**

A public notice was published in our local newspaper, the Courier Gazette, on Thursday, November 2, 2023. This same notice was posted to the Courier Gazette's online publication on Friday, October 27, 2023. The public notice was also posted to the Bangor Daily News online publication, the closest daily paper, on Friday, October 27, 2023. The public notice was also posted to the Town's website (<https://warrenmaine.org/>) on Friday, October 27, 2023. All notifications indicated that a copy of the grant application and the draft ABCA were available for public review and comment; indicated how to comment on those documents, where the draft application was located, and provided the date, time, and location of a public meeting to discuss the documents and proposed project. The initial online notifications were published more than two weeks (14 days) prior to our submittal of this application.



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c) **Public Meeting**

A public meeting to discuss the draft application (including the ABCA) and to consider public comments prior to submittal of this application was held at the Town office on Monday, November 13, 2023, at 6:00 pm. A summary of the public comments, meeting notes, and meeting sign-in sheet have been attached to this submittal.

d) **Submission of Community Notification Documents**

Documentation associated with the ads placed in local newspapers and subsequent documentation gathered during the Public Meeting are attached to this submittal. Attachments include:

- A copy of the draft ABCA;
- A copy of the newspaper ads;
- The public meeting sign-in sheet/participant list.
- A summary from the public meeting;
- A summary of the comments received (none); and,
- Our response to public comments (none).

Section III.B.15. - Named Contractors and Subrecipients

Not applicable. The Town has not named or selected any contractors or subrecipients to conduct the work associated with this application.