

## U.S. ENVIRONMENTAL PROTECTION AGENCY

## NEW ENGLAND

1 CONGRESS STREET, SUITE 1100, BOSTON, MA 02114-2023

## MEMORANDUM

DATE: June 8, 2004

SUBJ: ACTION MEMORANDUM - Request for a Ceiling Increase for the Non-Time Critical Removal Action at the Eastland Woolen Mill Superfund Site, Corinna, Maine

FROM: Edward M. Hathaway, Remedial Project Manager  
ME/VT/CT Superfund SectionTHRU: Mary Sanderson, Chief  
OSRR II BranchArthur Johnson, Chief  
Emergency Planning and Response BranchTO: Susan Studlien, Director  
Office of Site Remediation and Restoration

Site ID# 01T6

**I. PURPOSE**

This Action Memorandum requests and documents your approval of a fourth ceiling increase for the non-time-critical removal action (NTCRA) described herein for the Eastland Woolen Mill Superfund Site, located on Route 7 in Corinna, Maine. The ceiling for the NTCRA will be increased by \$3,275,189 to \$61,000,000. This is expected to be the final ceiling increase for the NTCRA.

The July 1999, June 2000, September 2000, and May 2001 Action Memoranda approved a consistency exemption from the \$2 million and 12-month statutory limits on fund lead removal actions. The same basis for a statutory exemption applies to this ceiling increase.

This Action Memorandum also clarifies that In-Situ Oxidation will be used to address the deep overburden and shallow bedrock source material that was not accessible during the excavation of contaminated soil.

As stated in the July 1999 Action Memorandum, the overall objective of the NTCRA is to eliminate the source of the soil, groundwater, and sediment contamination in order to protect current and future users of groundwater at or near the Site, future users of the Site property, and ecological receptors. In general terms, the NTCRA consists of the treatment of soil containing



## **ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

concentrations of monochlorobenzene, benzene, 1,2 dichlorobenzene, 1,3 dichlorobenzene, 1,4 dichlorobenzene, 1,2,3 trichlorobenzene, and 1,2,4 trichlorobenzene above the soil cleanup levels established in the July 1999 Action Memorandum. This NTCRA will be performed by EPA using fund money as no PRP is available to implement the response action in a timely manner. This Action Memorandum does not include any activities that would require Post-Removal Site Control (PRSC).

This NTCRA will ensure that EPA can provide a timely response to effectively minimize threats to public health or welfare or the environment which may result from the continuing release and/or threat of release of hazardous substances at and from the Site, and is consistent with EPA's Superfund Accelerated Cleanup Model (SACM).

### **II. SITE CONDITIONS AND BACKGROUND**

#### **A. Site Description**

<b>CERCLIS ID No.:</b>	<b>MED980915474</b>
<b>Site ID. No.:</b>	<b>01T6</b>
<b>Category</b>	<b>Non-time-critical</b>

The Site includes the former Eastland Woolen Mill and the local areas contaminated by the release of hazardous substances from the Eastland Woolen Mill. Eastland Woolen Mill was a textile mill that began operation in approximately 1909. The Eastland Woolen Mill ceased operation in 1996 and the majority of the Mill property is now owned by the Town of Corinna.

#### **1. Removal Site Evaluation**

See July 22, 1999 Action Memorandum for the original information relating to the removal site evaluation. Since the signing of the July 1999 Action Memorandum, EPA has completed the demolition of the former mill structures as well as the excavation and treatment of the contaminated soil. The remaining NTCRA activities include restoration of the areas disturbed as part of the NTCRA and in-situ treatment of the remaining source contamination in the deep overburden soil and shallow bedrock. EPA signed a Record of Decision for the groundwater within downtown Corinna, referred to as Operable Unit I, in September 2002. The Operable Unit I remedial action will target the restoration of the bedrock and overburden aquifers. EPA has completed the remedial investigation and feasibility study for Operable Unit II and expects to issue a cleanup proposal in summer 2004. Figure 1 shows the areas subject to the NTCRA, Operable Unit I, and Operable Unit II activities.

## ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004

### 2. Physical Location

The Eastland Woolen Mill Site is located in the Town of Corinna, Penobscot County, Maine. The Town of Corinna is located approximately 25 miles northwest of Bangor, Maine. Approximately 800 persons live within 1 mile of the Site and 2,500 with 4 miles.

The Site was originally dominated by the 250,000 square foot Eastland Woolen Mill. The former mill has been removed. Two dams are found in the vicinity of the Site. One dam is approximately 500 feet north (upstream) of the location of the former Eastland Woolen Mill and serves as the outlet for Corrunder Lake. The second dam is located approximately 0.5 miles down river of the Eastland Woolen Mill.

The Site has been used as industrial property since at least 1912. The Eastland Woolen Mill building may have been constructed as early as the late 1800's. The Eastland Woolen Mill Company owned and operated the mill from 1936 until 1996. The company assets were sold at a real estate foreclosure auction in 1997. In 1997, the Town of Corinna took title to the parcel on which the majority of the Eastland Woolen Mill buildings are located.

3. Site Characteristics: See July 22, 1999 Action Memorandum for the site characteristics that were the basis for the NTCRA.
4. Release or Threatened Release: See July 22, 1999 Action Memorandum for the release or threatened release information that was the basis for the NTCRA.
5. NPL Status: The Site was placed on the NPL in July 1999.
6. Maps, pictures, and other graphic representations: See July 22, 1999 Action Memorandum for this information. Figure 2 shows the area where NTCRA activity will be complete in 2004 and where the additional NTCRA work will occur.
7. Current Status of NTCRA

The NTCRA is about 90% complete. The contaminated soil that was accessible has been excavated and treated to levels that allow for site re-use. The areas disturbed by the NTCRA have been partially restored as of April 2004. The remaining NTCRA activities include the in-situ treatment of source areas that were not accessible for excavation and treatment as well as the remaining restoration activities. The NTCRA is expected to be completed in 2006.

## **ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

### **8. Basis for Ceiling Increase**

This ceiling increase is based upon the updated Site cost information. With 90% of the work complete, an accurate picture of the cost to complete has been developed. The actual extramural direct increase is \$1.7 million from \$44.9 million to \$46.6 million, which is less than 5% of the total NTCRA costs. The basis for the funding increase is a more realistic cost estimate for the in-situ treatment of the deep overburden source material based upon the completion of the design and the updated cost to demolish the soil treatment facility and restore the Site areas disturbed as part of the NTCRA.

### **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Section 300.415(b)(2) of the National Contingency Plan (NCP) lists a number of factors for EPA to consider in determining whether a removal action is appropriate, including:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- (ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;
- (iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;
- (iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;
- (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- (vi) Threat of fire or explosion;
- (vii) The availability of other appropriate federal or state response mechanisms to respond to the release; and
- (viii) Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

This Action Memorandum ceiling increase is based upon the same factors as the July 22, 1999

## **ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

Action Memorandum. The draft final design activities have confirmed that substantial concentrations of chlorinated benzene contamination are present in the soil and groundwater at the Site. The contamination is having an impact on the ecological community and threatens local water supplies.

### **IV. ENDANGERMENT DETERMINATION**

Actual or threatened releases of hazardous substances, pollutants, or contaminants, from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

### **V. EXEMPTION FROM STATUTORY LIMITS**

This ceiling increase will require additional funding above the statutory ceiling of \$2 million dollars and require more than 1 year to implement. As documented in the July 22, 1999 Action Memorandum, this NTCRA will require funding above the statutory ceiling of \$2 million dollars and will require more than 1 year to implement. The duration of the removal has been revised to an expected time frame of 7 years. The same basis for the statutory requirements apply to this Action Memorandum. This Action Memorandum re-affirms the finding that a "consistency" exemption is appropriate in order to implement the NTCRA proposed in this Action Memorandum.

The proposed response action described in the July 1999, June 2000, September 2000, and May 2001 Action Memoranda and this Action Memorandum, is considered to be appropriate and consistent with the remedial action(s) to be taken at the Site. More specifically, the remaining actions to be performed under the NTCRA are precursors to the Operable Unit I groundwater cleanup action.

The implementation of the NTCRA is necessary to prevent the further migration of the contamination in the soils. Authorization is, therefore, hereby requested for a "consistency" exemption to exceed the statutory limits of \$2 million and 1 year on removal actions in order to implement the NTCRA as described in this Action Memorandum.

## **ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

### **VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

#### **A. Proposed Actions**

The following removal action objectives have been developed for the Site:

- \* Prevent, to the extent practicable, direct contact with and ingestion of surface and subsurface soils that represent an unacceptable health risk;
- \* Prevent, to the extent practicable, the migration of chlorinated benzenes (and other contaminants) in soils to the groundwater and surface water; and
- \* Prevent, to the extent practicable, the release of contamination believed to be within the building to the environment through flooding and further degradation of the structure from fire.

To meet the removal action objectives, EPA selected in the July 22, 1999 Action Memorandum a NTCRA to remove the source of the soil and groundwater contamination. This alternative was referred to as Alternative 2 in the EE/CA. The scope of the NTCRA has not significantly changed since the July 22, 1999 Action Memorandum.

1. Proposed Action Description (See July 1999, June 2000, September 2000 and May 2001 Action Memoranda)

The actions proposed in the July 1999, June 2000, September 2000, and May 2001 Action Memoranda remain the same.

2. Contribution to Remedial Performance

The Operable Unit I Record of Decision identified restoration to drinking water standards as the long-term cleanup strategy for the groundwater. The elimination of the material that is acting as a source of the groundwater contamination is critical to the success of the Operable Unit I cleanup action. As a result, the NTCRA is entirely consistent with all potential future remedial responses.

**ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

**B. Estimated Costs**

**Extramural Costs**

Regional Allowance Costs	\$46,500,000
(Money from national cleanup fund with contingency)	
Other extramural costs	
- State of Maine Cooperative Agreement	\$100,000

Extramural Direct Costs	\$46,600,000
Extramural Indirect Costs	<u>\$13,900,000</u>
Total Extramural	\$60,500,000

**Intramural Cost**

Intramural Direct	\$500,000
-------------------	-----------

Total Intramural	\$500,000
------------------	-----------

<b><u>Total Estimated Removal Ceiling</u></b>	<b><u>\$61,000,000</u></b>
---	----------------------------

**Notes:**

**Existing Removal Projected Ceiling  
based upon May 2001 Action Memorandum: \$57,724,811**

**Additional Ceiling Increase requested: \$ 3,275,189**

**ACTION MEMORANDUM FOR THE EASTLAND WOOLEN MILL SITE - JUNE 2004**

**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

The activities covered by the ceiling increase will allow for the completion of the NTCRA and facilitate the complete re-development of the Site. The funding needed to complete the NTCRA has already been received by the Region.

**VIII. RECOMMENDATION**

This decision document represents a ceiling increase and re-affirmation of the statutory basis and consistency exemption for the selected removal action for the Eastland Woolen Mill Superfund Site in Corinna, Penobscot County, Maine, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site.

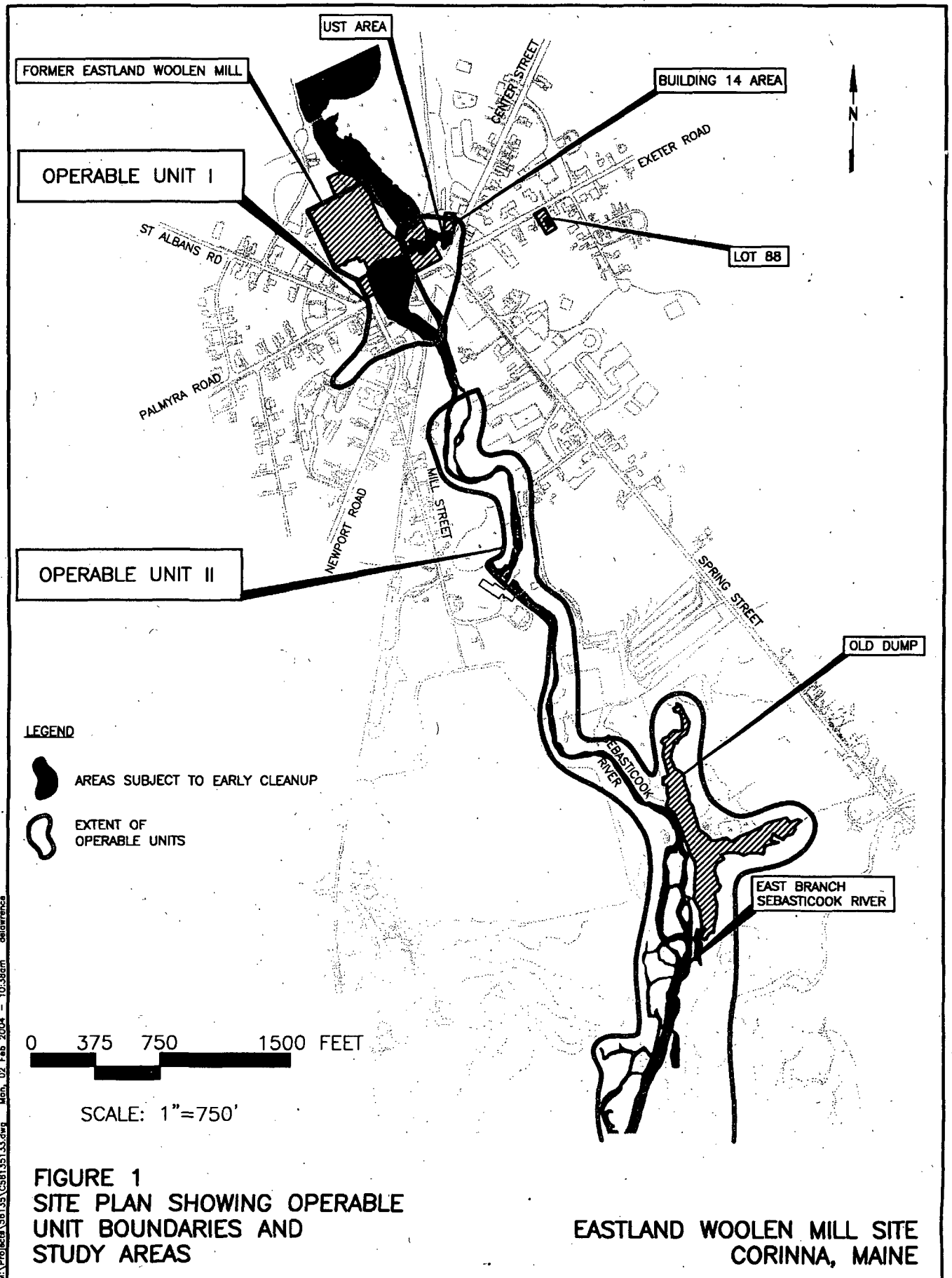
Conditions at the Site continue to meet the NCP criteria for a removal action as specified at 40 C.F.R. § 300.415(b)(2) and the CERCLA Section 104(c) consistency exemption. I recommend your approval of the proposed project ceiling increase of \$3,274,189. The total project ceiling for the NTCRA, if approved, will be \$61,000,000.

Approve  Disapprove

Date: 06/08/04

Susan Studlien  
Susan Studlien, Director  
Office of Site Remediation and Restoration





**FIGURE 1**  
**SITE PLAN SHOWING OPERABLE**  
**UNIT BOUNDARIES AND**  
**STUDY AREAS**

**EASTLAND WOOLEN MILL SITE**  
**CORINNA, MAINE**

M:\Projects\36135\36135\C58135133.dwg Men, 02 Feb 2004 - 10:38am delaware



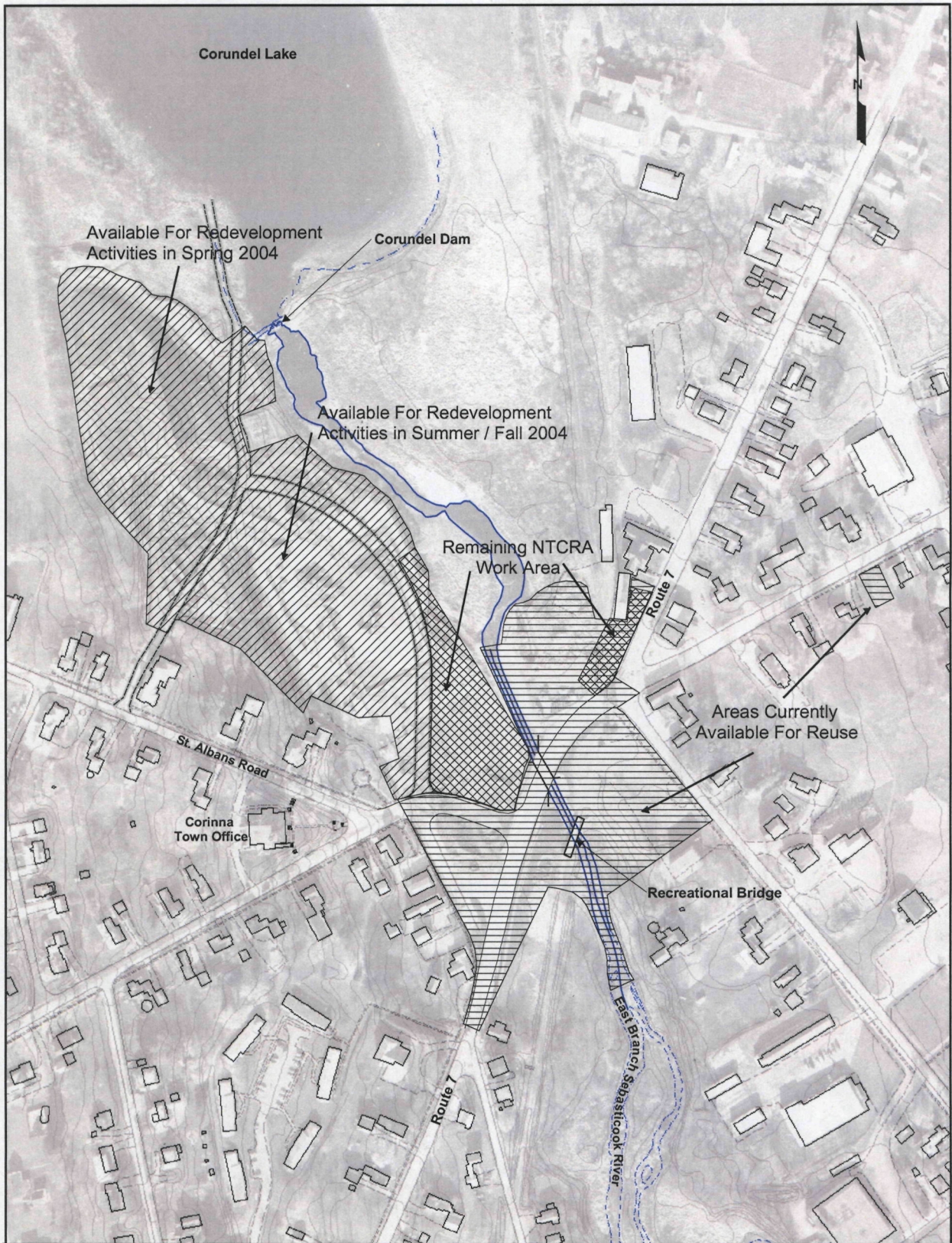


FIGURE 2  
LAND AVAILABLE FOR REUSE IN 2004

EASTLAND WOOLEN MILL SITE  
CORINNA, MAINE