

Superfund Records Center

SITE: Stenton Mill

BREAK: 2.2

OTHER: 641656

September 27, 2007

Chuck Morgan
Director of Economic and Community Development
Southern Maine Regional Planning Commission
21 Bradeen Street, Suite 304
Springvale, ME 04083

**Subject: Phase I Environmental Site Assessment – Rev 1
Stenton Trust
13 River Street - Sanford, Maine**

Dear Mr. Morgan:

Enclosed for your review is a copy of the Phase I Environmental Site Assessment (ESA) report completed for the Stenton Trust site located at 13 River Street in Sanford, Maine. This report was completed in general accordance with the American Society of Testing Materials (ASTM) Standard Practice E 1527-05 for Phase I ESAs. A copy of this report was also forwarded to Jonathan Morse, Owner OF the property and Gordon Fuller of the Maine Department of Environmental Protection (DEP) for their review.

Please do not hesitate to contact us at (207) 828-1272 if you have any questions.

Very truly,

JACOBS EDWARDS AND KELCEY

Robert Patten, P.E.
Office Manager

Judd Newcomb
Primary Author

cc:
Jonathan Morse, Gateway Properties
Gordon Fuller, Maine DEP

Enclosures – Phase I ESA



**TABLE OF CONTENTS
STENTON TRUST
SANFORD, MAINE**

Section	Title	Page No.
EXECUTIVE SUMMARY		ES-1
1. INTRODUCTION		1-1
2. SUMMARY OF PREVIOUS INVESTIGATIONS		2-1
3. SITE DESCRIPTION		3-1
3.1	Site Ownership and Location	3-1
3.2	Site Description and Operations	3-1
3.3	Site Utilities	3-1
4. SITE RECONNAISSANCE		4-1
4.1	Exterior Observations	4-1
4.2	Interior Observations	4-2
4.3	Underground and Aboveground Storage Tanks	4-6
4.4	Polychlorinated Biphenyls (PCB)	4-7
4.5	Radon	4-8
4.6	Asbestos	4-9
4.7	Lead Paint	4-9
4.8	Wetlands	4-9
4.9	Site Hydrology and Geology	4-10
5. CURRENT AREA CHARACTERISTICS		5-1
5.1	Abutting Properties	5-1
5.2	High Risk Properties Within 1,000 feet	5-1
5.3	Area Utilities	5-2
6. SITE AND AREA HISTORY		6-1
6.1	Site History	6-1
6.2	Area History	6-2
7. SUBJECT PROPERTY REGULATORY AND DEED INFORMATION		7-1
7.1	Local Environmental Review And Interviews	7-1
7.2	State Environmental Review	7-2
7.3	Federal Environmental Review	7-4
7.4	Environmental Liens	7-6
7.5	Institutional Controls	7-7
7.6	Property Value and Retail Price	7-7

8. AREA REGULATORY INFORMATION.....	8-1
8.1 State Environmental Review.....	8-1
8.2 Federal Environmental Review.....	8-6
9. SIGNIFICANT ASSUMPTIONS AND DATA GAPS	9-1
10. RECOGNIZED ENVIRONMENTAL CONDITIONS	10-1
11. OPINION AND RECOMMENDATIONS	11-4
12. REFERENCES.....	12-1
13. LIMITATIONS, EXCEPTIONS, AND DEVIATIONS	13-1
14. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS	14-1

LIST OF FIGURES

- Figure 1** – Site Location
Figure 2 – Site Plan

LIST OF TABLES

- Table 1** – Subject Property & Area Historical Summary
Table 2 – Spill Report Summary

LIST OF APPENDICES

- Appendix A** – Previous Investigations
Appendix B – Site Photographs
Appendix C – Subject Property Underground Storage Tank Information
Appendix D – FirstSearch Technology – Environmental Lien Search
Appendix E – Sanborn Fire Insurance Maps
Appendix F – Subject Property Spill Reports
Appendix G – Uncontrolled Site Information
Appendix H – VRAP Site Information

EXECUTIVE SUMMARY

Jacobs Edwards and Kelcey (JEK) performed a Phase I Environmental Site Assessment (ESA) for the Stenton Trust property located at 13 River Street in Sanford, Maine. The Phase I ESA was completed in conformance with the American Society of Testing Materials (ASTM) Standard Practice E 1527-05 for Phase I ESAs, which meets the requirements of the Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI); Final Rule (40 CFR Part 312). Based on our review of local, state and federal records and files, site historical records, and observations during our site visit on August 7, 2007, the following highlights our findings as part of this site assessment:

Subject Property Overview

- The site is comprised of one irregularly shaped parcel of land totaling 6.8-acres and is referenced as Map J29, Lot 18 by the Town of Sanford Tax Assessor's office. This property is located at 13 River Street in Sanford, Maine and is currently owned by Gateway Properties, LLC. The subject property is currently occupied by several light industrial businesses including a wooden toy manufacturer, a custom motorcycle shop, and a furniture finishing shop. A garage on the property is occupied by salvage business and is used for storage of salvaged furniture. The subject property is zoned Industrial Reuse (IR).
- The subject property is currently occupied by a 5-story, approximately 270,000 square-foot building built in the 1920s for textile manufacturing. The mill building generally consists of six distinct areas: the "A Tower", a five-story section of the building that consists of the quarter of the building closest to River Street; the "B Section", a one-story section of the building that consists of a central quarter of the building closest to River Street; the "C Tower", a five-story section of the building that consists of a central quarter of the building further from River Street; the "D Section", a one-story section of the building that consists of the quarter of the building furthest from River Street; the loading dock, a one-story section located along the north end of building; and, the building basement that underlies all sections of the building excluding the loading dock.
- The property obtains its potable water from the Sanford Water District. The source of water for the Sanford Water District is eight drilled groundwater wells located at various locations in Sanford, Maine. The subject property is connected to Sanford's municipal wastewater system. Central Maine Power (CMP) provides electricity to the subject property. The nearest water supply well is located approximately 0.81-miles northwest of the subject property. Heat is provided to the building by propane-fired boilers located in the basement of the building. One boiler is currently out of service.

Recognized Environmental Conditions

A *recognized environmental condition* is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a future release of hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term may include hazardous substances and petroleum products even under conditions in compliance with the law.

Based on our review of local, state, and federal records and files, site historical records and observations during our site visit on August 7, 2007, JEK identified the following *recognized environmental conditions* at the subject property:

- Several previous environmental site assessments completed for the subject property identified contamination in several areas of the property due to historical use of the site. These included primarily petroleum contamination in the area of the former underground storage tanks (USTs) located along the northern portion of the building and the onsite product fill line connected to a former 550,000 gallon petroleum UST located on the adjacent property as well as chlorinated solvent contamination in the northern portion of the property.
- Historical use of the property as a textile mill from the late 1800s into the late 1900s may have impacted surficial and subsurface soils in additional areas of the property.
- Potential asbestos-containing materials and potential lead-based paint were observed throughout the mill building and may represent a threat to human health through inhalation and ingestion.
- Thirteen electrical transformers and at least three capacitors that potentially contain PCBs were observed in interior locations within the mill building and in exterior areas on concrete pads.
- Potential PCB-containing oil staining was observed in a small electrical room accessible through the southeast building access tunnel, and on the exterior transformer storage pad.
- Significant oil staining was observed in several areas of the basement including the eastern storage area, in the vicinity of a large air compressor, and in the vicinity of the elevator lift.
- An oil spill was observed outside the eastern portion of the mill building in the vicinity of a "Process Oil" fill pipe. Reportedly this spill is in the process of being remediated.
- Hazardous materials were stored in various locations throughout the interior of the building, some of which included several bags of sulfur powder, a variety of paints, stains, and

lacquers, consumable quantities of lubricants and cleaners, several 55-gallon drums of boiler chemicals, several open containers of waste oil, and four 5-gallon containers of adhesive. Some of the containers appeared to be in poor condition. It should be noted that ten 55-gallon drums containing unspecified substances were observed outside of the building adjacent to the loading dock.

- Some hazardous materials from within the building have been consolidated into the "Hazardous Waste Storage Room" (see Figure 2). Ten 55-gallon drums of neoprene-latex adhesive, five 55-gallon drums of oil contaminated soil, two 55-gallon drums of transformer oil, and approximately 6 various sized drums of various chemicals were observed in this area. Additionally, a rolling tote of waste computer components, six canisters of refrigerant, and several one to five gallon buckets of unknown materials were observed in this room. Many of the containers appeared old and in poor condition.
- Several floor drains were observed in the building; however, the discharge locations of the floor drains are not currently known.
- A large boiler chimney and boiler house formerly occupied the property near the eastern border. A 550,000-gallon fuel oil UST was used to run the boilers in the boiler house for the Goodall Mill, this UST was formerly located on an adjacent parcel (east) of land but was abandoned-in-place. During the abandonment, contamination was identified and a large amount of contaminated soil was removed from the areas surrounding this UST; however, contamination is known to remain in place and could potentially impact the subject property.
- Universal wastes such as fluorescent bulbs, computer monitors, and lighting ballasts were observed in many locations throughout the building. Some storage locations are unsecured and bulbs and computer components are loosely stacked and prone to breaking.
- Paints, lacquers, and stains are stored in various locations throughout the building. While some containers are stored in an appropriate fashion, many containers are improperly stored and disorganized.
- The 8,000 gallon fuel oil UST is no longer in service and is not planned to be used in the future. This tank is required to be removed by under Maine regulation and may represent a threat of release to the subsurface environment.

De Minimis Environmental Conditions

De minimis environmental conditions generally do not present a material harm to public health or the environment, and would not be the subject of an enforcement action if they were brought to the attention of the appropriate governmental agencies. Based on our review of site historical files and observations during our site visit on August 7, 2007, JEK identified the following *de minimis environmental conditions* at the subject property:

- Encore Shoe, a former occupant of the subject property is listed as a small quantity hazardous waste generator. When a generator ceases operations at a facility, a RCRA closure in accordance with Maine Chapter 851, Section 11 of Maine's Hazardous Waste Management Rules is required to close out the hazardous waste generator number.

Opinions and Recommendations

Based on the *recognized environmental conditions* observed at the subject property, JEK recommends the following:

- Additional investigations are required to further delineate the known contamination on-site and potential contamination in other areas (e.g. garage in northern portion of the property, the boiler chimney, boiler house, transformers, etc.) in order to assess future reuse options for the property.
- Painted surfaces, ceiling tiles, pipe insulation, and other suspect materials should be sampled and tested to determine the status of lead-based paint and/or asbestos on the subject property prior to any redevelopment work performed on the site. Identified lead or asbestos-containing materials must be abated, as necessary, according to State and Federal regulations.
- Samples should be collected from all liquid-containing electrical transformers and capacitors and laboratory analyzed to confirm or dismiss the presence of PCBs.
- Wipe samples should be collected and laboratory analyzed for PCBs from stained areas observed in the vicinity of potential PCB containing equipment.
- All containers containing unknown hazardous materials identified on the property should be tested to determine their contents and then stored in a designated secure area until they can be properly disposed of according to State and Federal regulations. All labeled hazardous materials that are no longer required for use at the property should be properly disposed of.

- The discharge location of the floor drains should be confirmed and the floor drains permanently plugged if they are not needed for future use. If the discharge is to the subsurface environment, then additional investigations will be warranted. If the floor drains are required to be maintained for future use and are found to discharge to a location other than the sanitary sewer, hazardous material and petroleum products should not be located in the area of the drains.
- Stained soil observed in the area of the "Process Oil" fill pipe outside the eastern portion of the building should be delineated and properly remediated according to State and Federal regulations.
- The oil staining and spills observed within the building during the site visit should be delineated and properly remediated according to State and Federal regulations.
- The utility trench located in the basement of the building could not be inspected during the site visit due to the size of the covers. These trenches should be inspected to confirm or dismiss the presence of recognized environmental conditions.
- All universal wastes identified throughout the building should be consolidated and stored in a secure area until they can be properly disposed of according to State and Federal regulations.
- Paints, stains, and lacquers were observed to be stored throughout the building. If these products are no longer needed they should be removed from the property and properly disposed of. If these products are to be used in the future they should be consolidated and stored in a secure area.
- Recognizing the 8,000-gallon fuel oil UST is not planned to be used in the future, it should be properly removed.

Based on the *de minimis environmental conditions* observed at the site, Jacobs Edwards and Kelcey recommends the following:

- The hazardous waste generator status for Encore Shoe should have been closed out when they left the property. Therefore, JEK recommends completing a hazardous waste closure for Encore Shoe.
- JEK recommends enrolling the property in the Maine DEP Voluntary Response Action Program to obtain liability assurances for the investigation and cleanup of recognized environmental conditions at the subject property.

1. INTRODUCTION

Jacobs Edwards and Kelcey (JEK) performed a Phase I Environmental Site Assessment (ESA) for the Stenton Trust property located at 13 River Street in Sanford, Maine. The Phase I ESA was completed in general conformance with the American Society of Testing Materials (ASTM) Standard Practice E 1527-05 for Phase I ESAs, which meets the requirements of the US Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI); Final Rule (40 CFR Part 312). This report was completed for the Southern Maine Regional Planning Commission. The report was completed by Allysen Loftsgaarden, Judd Newcomb and Rip Patten, P.E. of JEK. A third party technical review of this report was completed by Matt Reynolds, P.E., C.G. of Drumlin Environmental.

The purpose of this site assessment is to identify the presence, release, and the threat of release of any hazardous substances or petroleum products affecting the property. No Phase I ESA can wholly eliminate uncertainty regarding the potential for recognized environmental conditions (RECs)¹ in connection with a property. The objective in conducting this site assessment is to reduce, not eliminate, uncertainty regarding potential for recognized environmental conditions in connection with the property. This report provides our opinion relative to the potential of contamination at the respective site so that informed business decisions may be made regarding the property.

To the extent possible, this Phase I ESA presents a concise summary that qualitatively identifies potential environmental liabilities. If the findings from this Phase I ESA indicate or reasonably imply that environmentally regulated materials are affecting the property in question, then the need for additional testing to evaluate the scope, location, source, and nature of any release or threat of release is included as a recommendation. In contrast, the Phase I ESA may also conclude that the likelihood of environmental problems is not significant and that there is no evidence of recognized environmental conditions in connection with the property.

In general, the scope can be divided into four broad categories:

- Records Review
- Site Visit
- Interviews
- Report

Based on our records review, interviews, and site reconnaissance visit on August 7, 2007, the following report highlights our findings as part of this Phase I ESA.

¹ Recognized Environmental Conditions (RECs) as defined by ASTM E1527-05 Standard Practice for the Performance of Phase I Environmental Site Assessments (ESAs).

2. SUMMARY OF PREVIOUS INVESTIGATIONS

During JEK's review of historical documentation, including Federal, State, and local environmental records, and interviews with local public officials, six prior environmental assessments were identified for the subject property. Copies of the environmental assessment reports (where available) are included in Appendix A.

Environmental Property Assessment, ENPRO Services, Inc. 1987

An Environmental Property Assessment was reportedly completed by ENPRO Services, Inc. (ENPRO) in 1987. This report was referred to in the report dated March 1993. A copy of this report was not obtained as part of this site assessment.

Environmental Property Assessment, ENPRO Services, Inc. March 1993

ENPRO completed an Environmental Property Assessment in March 1993 for the Stenton Trust property. At the time of the site visit the property was occupied by Encore Shoes, a shoe manufacturer; Expanded Rubber Products, Inc., a rubber products manufacturer; Cormier Textiles, a tarp and line fabricator; Central Appliance and Furniture for storage; Augut, Inc. for storage; and Alcon, Inc. for storage of equipment and materials.

The initial site visit and investigation in 1987 indicated that the property has historically been used for manufacturing processes and surrounding properties were also highly industrial. Several spills have been reported for the subject property as well as the surrounding properties. As a result of the findings, ENPRO conducted a subsurface investigation of the Stenton Trust property. Five soil borings were advanced and a groundwater monitoring well was installed in each boring. Locations were chosen based on historic use of the property such as UST locations, electrical transformer locations, and perceived upgradient and downgradient locations

Tetrachloroethene, trichloroethene, 1,2-dichloroethene, and methyl-tert butyl ether were each identified in the groundwater in ENP-5, in exceedence of the applicable EPA drinking water standards at the time. Free-phase oil identified as weathered #6 oil was also observed in two of the groundwater wells, with a thickness of 18-inches in ENP-4 and 0.25-inches in the ENP-1. ENPRO estimated that an 100 foot by 200 foot area was impacted by free-phase oil.

Based on it's monitoring well data, ENPRO inferred that groundwater flow was in a northerly direction at the site. However, this flow direction is inconsistent with flow data gathered by later assessments in the area.

ENPRO recommended the following as a result of the Environmental Property Assessment:

- A remedial action plan be developed to address the free-phase oil encountered in the groundwater wells.
- A No. 2 fuel oil UST, which is no longer used, should be removed from the property according to Maine DEP regulations.
- Groundwater contamination was identified in the groundwater wells located on the subject property. Additional investigations should be conducted to determine the source of contamination, extent, and perceived flow direction.
- During the site visit, waste oil was identified inside the Stenton Trust building which were being used, stored, and disposed of in the on-site furnace. It should be determined whether a permit is required to burn the waste oil.

Complaint and Notice of Opportunity for Hearing. United States Environmental Protection Agency. December 1994.

The United States Environmental Protection Agency (USEPA) issued a Complaint and Notice of Opportunity for Hearing in December 1994 due to violations with the PCB Rules. The statement states that on May 12, 1994 a representative from the USEPA and the Maine DEP inspected the facility and found that PCB containing materials containing greater than 50 parts per million were not properly labeled with the storage date or contents; were not stored correctly according to regulations; the facility was not licensed to process, store, dispose of, transport, or offer for transportation of PCBs; PCBs were stored on-site longer than allowed; and improperly disposed of PCBs due to a spill that was not remediated or reported as required. The facility owners were fined \$60,000 for failure to comply with PCB storage, labeling, and disposal requirements.

UST Removal. ENPRO Services, Inc., November 1995.

The removal of three USTs occurred on the subject property in November 1995. A 10,000-gallon, steel, No. 2 fuel oil UST with cathodic protection was formerly utilized at the facility. This tank was abandoned in place due to its location adjacent to a 24-inch water main. Minor contamination was identified around the fill ports for the UST during the abandonment-in-place of this tank.

An 8,450-gallon steel No. 6 oil UST was removed from the property in November 1995. Heavy staining was identified during the removal of this tank, which required the removal of over 200 tons of petroleum impacted soil was removed from the property due to this release. According to information obtained from the spill report, contamination (free product) remains on-site due to the location of the UST adjacent to the building's foundation; however, according to a memo issued by the Maine DEP on January 25,

1995, the contamination did not represent a threat to human health or the environment at that time.

A small amount of contamination was identified during the removal of a third 8,450-gallon, steel, parafinic oil UST. However, it was assumed that the spill was minimized due to a rock plugging the hole.

A total of 285 tons of contaminated soil was removed from this property as a result of leaking USTs. The soil was recycled by Commercial Recycling Systems for use as asphalt.

Notice of Violation, Maine DEP, April 2, 2007.

The Maine DEP issued a notice of violation on April 2, 2007 for the subject property concerning a hazardous waste management inspection conducted on January 9, 2007. The site inspection revealed that the facility handled and stored regulated hazardous wastes as well as generated regulated universal wastes. Hazardous wastes identified on the property included R-22 freon, polymeric isocyanate, part B amines, paints and coatings, and phosphoric acid. Universal wastes identified on the property included mercury containing lamps, mercury switches, cathode ray tubes, and certain types of batteries.

This notice of violation references a certified letter dated January 18, 2007 stated that all hazardous wastes be characterized and manifested from the subject property for licensed disposal.

Additional areas of violation included the following:

- Failure to mark containers as to the contents.
- Hazardous waste was stored in rusting, bulging, and leaking containers.
- Failure to keep containers storing hazardous wastes closed.
- Failure to designate a hazardous waste storage area, plus appropriate signage warning of hazardous waste storage areas was missing.
- Daily inspections were not conducted.
- Failure to operate the facility in a way to minimize fire, releases, or explosions.
- Failure to conduct or document hazardous waste training of personnel.
- Failure to maintain a hazardous waste contingency plan.
- Failure to report discharges of petroleum products.
- Failure to remediate discharges of petroleum products.
- Failure to maintain a USEPA id number for hazardous material generation.
- Failure to store universal wastes in a designated area in designated containers.
- Failure to remediate releases from universal wastes.
- Failure to train employees on requirements for handling, storage, and disposal of universal wastes.

The Maine DEP required the owners of the subject property to respond within 30 days of receiving this notice of violation with a plan outlining corrective actions to be taken in response to each of the violations. Analytical results, work orders, manifest copies, and other relevant documents were required to be submitted with the response.

Limited Subsurface Investigation, Former Goodall Worsted Mill, Campbell Environmental Group, February 2007.

Campbell Environmental Group (CEG) was retained by the Maine DEP to investigate sources of liquid-phase petroleum that were observed to be discharging through two outfalls located along the Mousam River downgradient from the former Goodall Worsted Mill. The former Goodall Worsted Mill consisted of the subject property as well as the adjacent York County Community Action (YCCA) property located east and south of the subject property. The CEG investigation was conducted to supplement DEP Spill # P-681-2006.

The investigation consisted of mapping sewer and drain lines at the property, conducting a geophysical survey of the site, the drilling and sampling of 21 soil borings, and the installation and sampling of groundwater monitoring wells from 11 locations. The investigation concluded that petroleum saturated soils were present downgradient from the former 550,000 gallon fuel oil UST (located on the YCCA property) and along the supply line to the former UST (which originates from the subject property). Liquid phase petroleum was encountered in these areas also. Perchloroethylene was detected in one of the petroleum samples collected from Outfall #1.

3. SITE DESCRIPTION

3.1 SITE OWNERSHIP AND LOCATION

Map J29, Lot 18

Site Owner(s):	Gateway Properties, LLC
Site Occupants:	Custom motorcycle shop, furniture finishing shop, wooden toy manufacturer
Date of Ownership:	July 22, 1999
Site Location:	1-13 River Street – Sanford, Maine
Zoning:	IR – Industrial Reuse
County:	York
USGS Quadrangle:	Sanford
Latitude and Longitude:	N 43° 26' 33.8", W -70° 46' 23.4" (Approximate)
SIC Code:	2511 - Wood Household Furniture, Except Upholstered

3.2 SITE DESCRIPTION AND OPERATIONS

The site is comprised of one irregularly shaped parcel of land totaling 6.8-acres and is referenced as Map J29, Lot 18 by the Town of Sanford Tax Assessor's office. This property is located at 13 River Street in Sanford, Maine and is currently owned by Gateway Properties, LLC. The subject property is currently occupied by several light industrial businesses including a wooden toy manufacturer, a custom motorcycle shop, and a furniture finishing shop. The garage on the property is occupied by salvage business and is used for storage of salvaged furniture. The subject property is zoned Industrial Reuse (IR). Figure 1 locates the site on the Sanford, Maine quadrangle prepared by the United States Geological Survey (USGS). Figure 2 is a site plan based on observations made during JEK's site visit on August 7, 2007 and Town records.

3.3 SITE UTILITIES

The property obtains its potable water from the Sanford Water District. The source of water for the Sanford Water District is eight drilled groundwater wells located at various locations in Sanford, Maine. The nearest water supply well is located approximately 0.81-miles northwest of the subject property. The subject property is connected to Sanford's municipal wastewater system. Central Maine Power (CMP) provides electricity to the subject property. Heat is provided to the building by propane-fired boilers located in the basement of the building. One boiler is currently out of service.

4. SITE RECONNAISSANCE

4.1 EXTERIOR OBSERVATIONS

On August 7, 2007 JEK representatives conducted a site visit to the Stenton Trust property to determine the physical characteristics of the property and the potential presence of *recognized environmental conditions* (RECs) at the subject property. The site is comprised of one mill building formerly used for cotton textile manufacturing and a garage. The building is currently occupied by light industrial businesses including a wooden toy manufacturer, a custom motorcycle shop, and a furniture finishing company. The garage is currently occupied by a furniture salvage company and is used for storage of salvaged goods.

Exterior portions of the subject property generally consist of gravel parking, paved parking, or lawn areas. Paved parking is located near the northwest entrance of the building adjacent to River Street. Gravel Parking is available north and east of the building. A small vegetated area separates the upper and lower portions of the gravel parking lot located north of the building. A large retaining wall separates the upper and lower portions of the gravel parking lot located east of the building. Steeply sloping terrain replaces the retaining wall near the midpoint of the building. The sloped terrain east of the building is thickly vegetated. A small gravel parking area is also located to the south of the mill building.

Former building foundations were observed in the lower gravel parking area to the east of the building (see Figure 2) that may have been part of the original mill complex. Remnants of a small brick and concrete structure remain near the southern end of the retaining wall. A gated tunnel is located adjacent to the foundations in the lower parking lot. The tunnel trends beneath the eastern and upper gravel parking area to the basement of the building. A small electrical room with remnant electrical equipment is located at the approximate halfway point of the tunnel. Electrical circuitry, two small potential transformers, and two large capacitors were observed in the electrical room. The concrete floor of the room appeared damp and dirty; therefore, evidence of floor staining could not be determined.

A chain-link fence enclosed transformer area was observed at the base of the eastern slope. The fenced area contained nine large electrical transformers of various type, age, and condition. According to the property management subcontractor, Mr. Bob LaChance, three of these transformers are still periodically in use. Due to three transformers being in use, the transformer area was not entered due to safety concerns. Vegetation overgrowth and leaves hid the concrete transformer pad; therefore evidence of transformer leaks or spills could not be determined. An open area within the fenced transformer area appeared to formerly contain three additional transformers. According to Mr. LaChance, two transformers had been removed for the purpose of salvaging copper. One of these transformers was moved adjacent to the garage and was observed on a trailer. No evidence of leaks or spills was observed around the transformer. The second transformer was observed in the gravel area within a former foundation in the lower

gravel parking lot located to the east of the building. No evidence of leaks or spills was observed around the transformer.

A concrete slab and building foundation were observed in the upper gravel parking lot located south of the mill building. Two propane ASTs were observed on the concrete slab. Mr. LaChance indicated a building was formerly present in this location; however, it was demolished years ago. A second tunnel was observed in the lower gravel parking area located south of the building. The tunnel provides access to the south end of the mill building basement and access to leased space.

An underground storage tank (UST) pad was observed to the north of the building adjacent to the loading dock. No evidence of spills was observed in the vicinity of the fills. Several unlabeled steel and plastic drums were observed outside the loading dock area adjacent to the northeast corner of the building. Mr. LaChance was unsure of their contents.

A "Process Oil" fill pipe was observed at the approximate midpoint of the east side of the building. Oil staining and an obvious odor were observed in this location. Mr. LaChance and another worker were in the process of hand digging contaminated soil from this area and containerizing the soil in 55-gallon steel drums. According to Mr. LaChance, the self-cleanup of the oil spill was approved by Mr. Stephen Brezinski of the Maine Department of Environmental Protection. The 55-gallon drums were set on pallets and transferred to the hazardous waste collection room in the northeast corner of the mill building.

According to the leaser of the garage and owner of the salvage company, the garage contains dry goods including furniture, clothing, art, and other household items. The company collects goods from homes of the deceased, abandon buildings, or on a will-call basis for the purpose of auctioning them for profit. The leaser opened the garage bays for inspection of the building; however the garage was at its maximum capacity and no aisles were clear for inspection. Upon interviewing the leaser he identified approximately 80 cans of paint varying from .1 quart to 5-gallons in volume. Some mattresses, scrap metal, and used tires were observed around the exterior of the garage.

Properties adjacent to the subject property appeared to be primarily commercial or residential buildings

Site photographs taken during the site visit are included in Appendix B.

4.2 INTERIOR OBSERVATIONS

The subject property is currently occupied by a 5-story, approximately 270,000 square-foot building utilized by small businesses which use the property for light industrial purposes. The building was built in the 1920s and was formerly used for textile manufacturing. The mill

building generally consists of six distinct areas: the "A Tower", a five-story section of the building that consists of the quarter of the building closest to River Street; the "B Section", a one-story section of the building that consists of a central quarter of the building closest to River Street; the "C Tower", a five-story section of the building that consists of a central quarter of the building further from River Street; the "D Section", a one-story section of the building that consists of the quarter of the building furthest from River Street; the loading dock, a one-story section located along the north end of building; and, the building basement that underlies all sections of the building excluding the loading dock.

In general, fluorescent lighting was observed throughout the building. Additionally, potential asbestos-containing piping insulation associated with the heating system, and painted surfaces of varying condition were observed throughout the building. Due to the age of the building, there is the potential for the presence of lead-based paint and asbestos-containing material including insulation.

A Tower

First Floor

The first floor is currently vacant and has been finished as office space. The area is generally empty with limited amounts of furniture and remnant office materials. No evidence of hazardous materials storage was observed in this area.

Second Floor

The second floor was previously occupied by a computer refurbishing company. Spare computer components were observed throughout a large portion of this floor. Approximately 30 one-gallon containers of paint were observed spread throughout the office space. Approximately 18 spent fluorescent bulbs were observed consolidated in a storage closet in one office.

Third, Fourth, and Fifth Floors

The third, fourth, and fifth floors are currently vacant and generally unused. The third floor is used for cardboard box storage by building occupants. No evidence of hazardous materials storage was observed on any floor; however, an approximately half full 55-gallon drum of dried resin was observed on the fourth floor.

B Section

The "B Section" of the building is currently in use by a wooden toy manufacturer. Wood and product storage was observed throughout this area. A spray booth was observed in the central portion of the B Section that appeared to be vented through the roof. No evidence of significant

paint spills were observed in this area. A small compressor room is located in the north portion of this area. A small compressor oil spill was observed on the wooden floor of this area. In general, only paints, lacquers, and adhesives are stored in this area.

The southern portion of the "B Section" has been partitioned into office space and is currently vacant.

C Tower

First Floor

The northern half of the first floor is currently in use as storage by the wooden toy manufacturer. Pallets of 55-gallon drums containing a water-based wood finish were observed in this area. No other evidence of hazardous materials storage was observed in this area.

The southern half of the first floor was formerly used as a workshop and is currently used as storage. New and used computer components were observed throughout this area. Approximately 50 one-quart containers of inks and toners were observed in this area. Some ink has been spilled on the concrete floor. Approximately 30 one-gallon containers of enamel paint, and 7 five-gallon buckets of paint were also observed in this area. No evidence of paint spills or leaks were observed in this area.

Second Floor

The second floor is currently in use as dry storage. Used display cases, fitness equipment, boxes of goods, and architectural salvage materials were observed in the storage spaces on this floor. No evidence of hazardous materials storage was observed on this floor.

Third Floor

The third floor is currently in use as wood storage for the wooden toy manufacturer. Approximately one pallet of spent fluorescent bulbs was observed on this floor. Potential asbestos-containing pipe insulation was observed in a wet pile at the base of a ventilation duct in the center of this floor. No evidence of hazardous materials storage was observed on this floor.

Fourth Floor

The fourth floor is currently vacant and not in use; some cardboard boxes were observed in this area.

Fifth Floor

The fifth floor is currently used for wood storage by the wooden toy manufacturer. Some damaged tar roofing and a vent cap were observed in a corner room of this floor. No evidence of hazardous materials storage was observed on this floor.

D Section

The "D Section" of the building is currently in use as storage by the wooden toy manufacturer. A room in the north end of the "D Section" has been closed and is in use as a hazardous materials consolidation room for materials collected at the mill over its historical operations.

One floor drain was observed in a wood product storage area. The outfall of the floor drain is unknown. No evidence of hazardous materials storage, leaks, or spills was observed in the wood product storage area or the vicinity of the floor drain.

Some hazardous materials from within the building have been consolidated into the "Hazardous Waste Storage Room" (see Figure 2). Ten 55-gallon drums of neoprene-latex adhesive, five 55-gallon drums of oil contaminated soil, two 55-gallon drums of transformer oil, and approximately 6 various sized drums of various chemicals were observed in this area. Additionally, a rolling tote of waste computer components, six canisters of refrigerant, and several one to five gallon buckets of unknown materials were observed in this room. Many containers appeared old and in poor condition. No evidence of spills was observed in this area.

Loading Dock

The loading dock is currently in use by the wooden toy manufacturer for the receiving and shipment of wood products. A three foot by three foot steel hatch was observed in this area, and provides access to utility piping. Approximately ten drums with unknown contents were observed outside the loading dock. No other evidence of hazardous materials storage was observed in this area.

Building Basement

The basement of the building underlies the entire building excluding the loading dock. The western and southern sections of the basement have been partitioned into four leased spaces. Two spaces are vacant and contain remnant office materials and furniture. One leased space is currently occupied by a custom motorcycle shop, and one leased space is currently occupied by a furniture finishing company. The custom motorcycle shop was not accessible at the time of the site visit.

The furniture finishing shop occupies the southeast portion of the building basement and paints, stains, and lacquer wood products. A spray booth was observed in the southeast corner of this area that is vented through the first floor wall of the building. Consumable quantities of paints, stains, lacquers, and thinners were observed in this area. Containers appeared well organized and some materials were stored in a fireproof cabinet. No evidence of significant paint spills was observed in this area. The furniture finishing shop is heated with a No. 2 fuel oil burner located within the space. Two 275-gallon fuel oil aboveground storage tanks (ASTs) were observed in this area. According to the tenants, fuel oil piping was improperly installed and a small fuel oil spill occurred. Maine DEP was notified of the spill and the piping issue has since been repaired. A steel plate covered utility trench trending north to south was observed in the east section of the basement area. Due to the size of the plates, the trench could not be opened during the site visit.

The remaining portions of the basement are generally open space, with a partitioned area extending north to south along the eastern side of the building. A boiler room and two stairwells are present in the northern portion of the basement. Potential asbestos-containing pipe insulation associated with the heating system was observed throughout the basement areas. The main basement area is currently used for storage of miscellaneous goods. Significant quantities of universal wastes and hazardous materials were observed throughout the basement area. Universal wastes observed included large quantities of spent fluorescent bulbs, an electrical capacitor, several containers of potential PCB-containing lighting ballasts (ballasts not labeled "Non-PCB"), new and used cathode ray tubes, and a variety of other computer components. Hazardous materials observed included several bags of sulfur powder, a variety of paints, stains, and lacquers, consumable quantities of lubricants and cleaners, several 55-gallon drums of boiler chemicals, several open containers of waste oil, and four 5-gallon containers of adhesive. Universal wastes and hazardous materials were improperly stored and prone to leaks, spills, and breakage.

Significant floor staining believed to be associated with waste oil was observed in several locations throughout the eastern storage area. In addition, a significant oil spill was observed around an air compressor within the eastern storage area. Sorbent materials had been placed on the spill; however sorbents appeared saturated and ineffective. Significant oil and grease staining was also observed in the vicinity of the freight elevator lift located in the northwest corner of the basement.

4.3 UNDERGROUND AND ABOVEGROUND STORAGE TANKS

Four USTs are registered for the subject property with the Maine DEP under Registration No. 3873. Currently an 8,000-gallon, double-walled, No. 6 fuel oil UST is located on the subject property. The tank was installed in 1995 and is cathodically protected and monitored by continuous electronic monitoring for both the tank and the piping. The tank was formerly used to run the boilers for the subject property and is not currently in use.

A 10,000-gallon, steel, No. 2 fuel oil UST with cathodic protection was formerly utilized at the facility. This tank was abandoned in place in 1995 due to its location adjacent to a 24-inch water main. Minor contamination was identified around the fill ports for the UST during the abandonment-in-place of this tank (Maine DEP Spill No. P-111-95).

A former 8,450-gallon steel No. 6 oil UST was removed from the property in November 1995 (Maine DEP Spill No. P-111-95). Heavy staining was identified during the removal of this tank, which required the removal of over 200 tons of petroleum impacted soil from the property. According to information obtained from the spill report, contamination (free product) remains on-site due to the location of the UST adjacent to the building's foundation; however, according to a memo issued by the Maine DEP on January 25, 1995, the contamination did not represent a threat to human health or the environment at that time.

A fourth 8,450-gallon, steel, parafinic oil UST was removed from the property in November 1995. A small amount of oil had been released; however, it was assumed that the spill was minimized due to a rock plugging the hole. Parafinic oil is used in rubber compounds.

Information pertaining to USTs is located in Appendix C.

Two 275-gallon fuel oil ASTs were observed in the buildings basement. These ASTs are used by the furniture finishing shop to run the fuel oil burner. These tanks appeared to be fairly new and no staining or evidence of a leak was observed on or in the area of these ASTs. In addition, two 1,000-gallon propane ASTs are located on the southern portion of the property and are used to fuel the onsite heating system in the remaining occupied spaces. No additional ASTs were observed on the subject property during the site visit.

4.4 POLYCHLORINATED BIPHENYLS (PCB)

PCBs are suspected carcinogens that were formerly used in electrical transformers and florescent lighting ballasts. Nine pad-mounted transformers (three sets of three) were observed in a fenced transformer area located in the southeast of the subject property. An open space that appeared to formerly hold 3 additional pad-mounted transformers was also observed in this area. Each set of transformers appeared to be of different type and age, and according to Mr. Bob LaChance, a property management subcontractor, one set of transformers is occasionally still used when the building' freight elevator is required. The transformer area was overgrown with vegetation and the transformer pad was covered with leaves. Due to the presence of active transformers, the transformer area was not entered for closer inspection.

One large transformer was observed staged in the gravel area northeast of the transformer area and according to Mr. LaChance, was removed from the transformer area for the purpose of copper salvage. One large former pad-mounted transformer was also observed on a trailer

located northeast of the garage. According to Mr. LaChance, he had removed the transformer from the transformer area for the purpose of salvaging copper from the transformer. According to Mr. LaChance, the third transformer from the transformer area is missing and no records are available for its disposal. Mr. LaChance reportedly drained approximately two 55-gallon drums of oil from the transformer when he was informed the oil may contain PCBs and he should not be draining them without sampling first. Mr. LaChance ceased draining the transformer and relocated the two drums of oil to the hazardous waste collection room within the building. Due to the age of the transformer, it is likely it contains PCB-containing oil. No evidence of leaks or spills was observed on the trailer or its vicinity.

One large electrical capacitor was observed loose on the floor of a basement storage area. The capacitor appeared to be leaking and minor staining was observed on the concrete floor around the capacitor. Two small potential transformers and two large capacitors were observed installed in a former electrical room located in the east access tunnel. These transformers appeared to be dry-type, however may contain oil. Old capacitors are generally oil filled and may contain PCBs; however, according to ENPRO Services, Inc. of South Portland, some old capacitors were mercury filled.

Fluorescent lighting was observed within in the mill building. Recognizing the age of the structure, the potential exists for some fluorescent lighting ballasts to contain PCBs. In addition, several containers of fluorescent lighting ballasts were observed in the basement of the building. The lighting ballasts were not labeled "Non-PCB" therefore may contain PCBs.

It should be noted that a "Complaint and Notice of Opportunity for Hearing" was issued for the subject property concerning PCB Rules in December 1994. This Notice was discussed previously in Section 2.0 *Summary of Previous Investigations*.

4.5 RADON

Radon is a colorless, radioactive inert gaseous element that occurs naturally from the radioactive decay of radium or uranium atoms found in soil and rocks. Inhaled radon has been shown in several epidemiological studies to result in lung cancer. In addition, recent experimental work related to the ingestion of radon in drinking water suggests that the number of fatal cancers could be significant. Soil gas is considered the most important contributor of radon with decreasing levels of contribution from outdoor air, potable water, and building materials.

Recognizing that no residential spaces are located in below grade areas of the building, radon in air is not anticipated to be a concern for the site. The site is supplied with public drinking water from the Sanford Water District; therefore, radon in drinking water is not perceived to be a concern.

4.6 ASBESTOS

Asbestos is a heat-resistant, naturally occurring mineral that breaks into fibers. Asbestos is the generic term for six different types of minerals. Some forms of asbestos are highly toxic by inhalation of dust particles. Past uses of asbestos include pipe and boiler insulation, fire and soundproofing, brakes, gaskets, floor tiles, roofing materials, cement products, curtains, and water pipes.

The building was originally constructed in 1922; therefore, asbestos-containing construction materials are likely present. Potential asbestos-containing piping insulation associated with steam heating was observed in various locations throughout the building. Some locations of piping insulation appeared to be damaged and/or friable.

4.7 LEAD PAINT

Lead is toxic by ingestion and inhalation of dust or fumes. Health effects are generally correlated with blood test levels. Infants and young children absorb ingested lead more readily than older children and young adults. Primary exposure routes include lead paint, lead solder and pipes in drinking water lines, and air quality in inner city settings. Lead paint testing is typically warranted for residential properties constructed prior to 1978 and properties where children spend a significant amount of time, such as a daycare facility.

Recognizing the age of the structure on the subject property, lead based paint may be present on the site. Peeling and/or cracking painted surfaces were observed throughout the mill building that may be lead-based paint.

The structure is not used for residential purposes; therefore, lead based paint is not currently perceived to be a concern. If the site were to be redeveloped in the future for residential purposes, potential lead-based paint should be tested and if tests confirm lead-based paint, impacted areas of the site will require abatement according to state and federal regulations.

4.8 WETLANDS

Potential environmental concerns include wetlands, surface drainage patterns, flora and fauna, and sensitive ecological habitats. A formal wetland survey was not included in the scope of work for this Phase I ESA. According to the U.S. Fish & Wildlife Service National Wetlands Inventory, no wetlands are located on the subject property. No evidence of wetland type vegetation was observed on the property during the site visit.

4.9 SITE HYDROLOGY AND GEOLOGY

4.9.1 Surface Water Characteristics

The majority of the subject property is covered by the mill building, impervious paved parking areas, and unpaved parking/driveway areas. The subject property is generally flat; however, the majority of the subject property slopes gently downward to the southwest towards the Mousam River and No. 1 Pond. Due to the large retaining wall located in the eastern portion of the site, localized areas of stormwater flow may be diverted to the east, before resuming a southward trending flow. Stormwater at the site will generally follow the topography and appears to flow in a southwesterly direction, via overland flow.

4.9.2 Groundwater Characteristics

Limited data has been collected on groundwater flow characteristics on the site and in the vicinity. The February 2007 investigation of the adjoining Goodall Worsted Mill site indicated that groundwater on that site flowed south toward the Mousam River. Limited groundwater elevation data collected on the subject property by ENPRO in 1993 and by Campbell Environmental Group in 2006 indicates that the groundwater elevation south of the building is higher than the groundwater elevation north or east of the building. This data suggests that groundwater flow on the subject property may not flow directly toward No. 1 Pond or the Mousam River. Additional data would be required to characterize on-site groundwater flow conditions and the influence of stormwater runoff, infiltration/recharge, the presence of subsurface structures and utilities, and varying subsurface hydrogeologic conditions.

As mapped by the Maine Geological Survey (MGS), the site is located over a significant sand and gravel aquifer, which yields less than 50 gallons per minute.

4.9.3 Geological Characteristics

The MGS Surficial Geology map of the Sanford Quadrangle indicates that the subject property is located in an area comprised of stream terrace deposits, which consist of sand and gravel deposits on erosional terraces at elevations between the original Sanford outwash plain surface and the modern flood plain. According to the MGS Bedrock Geologic Map of Maine (1985), bedrock in the vicinity of the subject property is intrusive carboniferous muscovite granite. Depth to bedrock in the area ranges from approximately 30 feet below the ground surface (bgs) to approximately 44 feet bgs.

5. CURRENT AREA CHARACTERISTICS

5.1 ABUTTING PROPERTIES

The site is located in an area primarily comprised of industrial, commercial, and residential properties. Abutting properties include the following:

- North:* The site is bordered to the north by several residential properties and Gowen Street.
- East:* The subject property is bordered to the east by York County Community Action Corporation, a community based corporation that delivers social service and health education to impoverished families.
- South:* The site is bordered to the south by a vacant lot and a warehouse property beyond which is High Street. South of High Street is the Sanford Mill property.
- West:* The site is bordered to the west by River Street, beyond which is a strip mall and a gas station.

5.2 HIGH RISK PROPERTIES WITHIN 1,000 FEET

A high risk property is a property that because of its current or historical uses, may pose a threat to public health or the environment. High risk properties included current or historic manufacturing, chemical, petroleum, mining, shipping, transportation (freight, airports, railroads, bus stations, etc.) and automotive repair facilities, and pipelines. Three high risk properties were identified within 1,000 feet subject property.

The Goodall Mill site is located directly adjacent (upgradient) to the subject property on the corner of Spruce and High Streets. This site has had several investigations conducted concerning petroleum contamination due to leaking USTs as well as historical use of the property for industrial purposes. Reportedly contamination still exists on the property. This site will be discussed later in Section 8.1 *State Environmental Review – VRAP Sites*.

Aerofab, a former airplane parts manufacturer is located within 1,000-feet of the subject property and is considered a high-risk property due to historical industrial use. This site is discussed later in Section 8.1 *State Environmental Review – Uncontrolled Sites*.

The Sanford Mill, was an industrial facility formerly used to manufacturer blankets, curtains, fabrics, plastic heels for women's shoes, and a plastics manufacturer. Light bulbs were also assembled at the facility. This site is considered a high-risk property due to historical industrial use and will be discussed later in Section 8.1 *State Environmental Review – VRAP Sites*.

5.3 AREA UTILITIES

Drinking water is supplied to the surrounding area by eight drilled groundwater wells located at various locations in Sanford; these wells are maintained by the Sanford Water District. The surrounding properties are connected to Sanford's municipal wastewater system. Central Maine Power (CMP) provides electricity to the subject property.

6. SITE AND AREA HISTORY

Historical documents and records may contain information regarding past ownership and uses of a property that may be essential to assessing the potential for environmental conditions indicative of releases of hazardous materials.

6.1 SITE HISTORY

ASTM standards for Phase I ESAs require that historical records on the subject property be searched for information on the property covering a time period back to 1940 or the property's earliest development, whichever is earlier, based on available documentation. The earliest records found for the site were Sanborn Fire Insurance maps, dated 1892. No earlier Town, State, or Federal records were located during our research.

Historic USGS Maps

The site is located on the Berwick, Maine quadrangle prepared by the United States Geological Survey (USGS). Historical USGS quadrangles for Sanford dated 1893, 1937, 1944, and 1958 were reviewed relative to the subject property. The map dated 1893 indicates that portions of the property were occupied by structures. The maps dated 1937 and 1944 indicate that the property was developed with structures. The map dated 1958 shows the current building in place and additional buildings in the immediate vicinity of the subject property.

Aerial Photographs

Aerial photographs and plans of the subject property and surrounding area were reviewed online as well as at Town Hall. An aerial photograph dated April 2005 depicts the property similar as it is today. The building and garage are in place. Parking areas, gravel areas, and vegetated areas appear to be similar to what was observed during the site visit. A photo dated April 1998 depicted the property as similar to the April 2005 aerial photograph.

An aerial photograph was taken in the 1930s of the mill which depicted the property as occupied by the current structure as well as having a large boiler chimney in place. Several additional buildings were present on the property east and south of the boiler chimney.

Ownership Records

Ownership records were examined at the Town of Sanford Tax Assessor's Office. Tax cards were provided by an assistant at the Town Tax Assessor's office, and reviewed on August 7, 2007. The tax cards stated Gateway Properties, LLC purchased the property from Stenton Trust on July 22, 1999. The Stenton Trust obtained the property on December 28, 1959 from Lawrence L. Reeve. Lawrence L. Reeve owned the property since at least 1950. No previous ownership records were obtained.

An environmental lien search was completed for the property in August 2007 by FirstSearch Technology Corporation and is included as Appendix D. No environmental liens were identified during the course of the search.

No additional historical ownership information of the property was obtained as part of this environmental lien search.

Sanborn Fire Insurance Maps

Historic Sanborn Fire Insurance Maps of the Town of Sanford dated 1892, 1896, 1901, 1906, 1912, 1921, 1930, and 1930 revised to 1964 were reviewed relative to the subject property. These maps are summarized in Table 1. The Goodall Worsted Company occupied the site in all of the maps viewed, with the exception of the 1930 map revised to 1964 in which the property was occupied by Seamloc Loma-Loom Carpet Company. Each map depicts changes in building use, land use, and/or expansions of the facility. The current building was not depicted on the property until the map dated 1930. The Sanborn Fire Insurance Maps are included in Appendix E.

6.2 AREA HISTORY

Historic USGS Maps

The site is located on the Berwick, Maine quadrangle prepared by the United States Geological Survey (USGS). Historical USGS quadrangles depicting Sanford dated 1893, 1937, 1944, and 1958 were reviewed relative to the subject area. The 1893 map depicts Sanford as a small Town; with development primarily clustered along the Mousam River. Structures are shown in the vicinity of the subject property. The area has become more developed in the 1937 map; however, Sanford appears to still be somewhat limited in its development. The maps dated 1944 and 1958 show progressively more development in the area of the subject property. It should be

noted that several gravel pits are depicted in the general area (0.5-mile radius) of the subject property.

A gas tank is depicted adjacent (southeast) to the subject property on the 1958 map and several mills are located in close proximity to the subject property. No additional high risk properties (airports, mines, landfills, etc.) were identified on the historic USGS maps within one mile of the subject property.

Aerial Photographs

Historical aerial photographs of the subject property and surrounding area were reviewed online and at the Sanford Town Hall on August 7, 2007. Aerial photographs dated 2005 and 1998 depict the area surrounding the subject property as primarily residential and commercial type properties. However, the areas located south of the subject property were depicted as industrial type properties. The aerial dated 2005 depicts the property located directly adjacent (east) of the subject property as occupied by newer constructed buildings. The aerial dated 1998 depicts this same property as vacant of buildings. The aerial photograph from the 1930s depicts the surrounding area as highly industrial to the south and east, residential to the north, and commercial and residential to the west.

Sanborn Fire Insurance Maps

Historic Sanborn Fire Insurance Maps of the Town of Sanford dated 1892, 1896, 1901, 1906, 1912, 1921, 1930, and 1930 revised to 1964 were reviewed relative to the area surrounding the subject property. All of the maps depicted the area to be comprised primarily of residential, industrial, and commercial facilities. Table 1 summarizes property use surrounding the subject property.

The Stenton Trust property was primarily surrounded by industrial and residential properties throughout the years. It should be noted that the subject property was once part of a larger parcel of land occupied by the Goodall Worsted Mill Company. The Sanford Mills complex was situated south of the subject property for the majority of the time. Residential properties were situated north of the property. Remaining portions of the Goodall Worsted Mill complex were situated east of the subject property. Store houses and residential properties were situated across River Street from the subject property.

The Sanborn Fire Insurance Maps are included in Appendix E.

7. SUBJECT PROPERTY REGULATORY AND DEED INFORMATION

Files at the Sanford Town Hall, Maine DEP, and the EPA Region 1 were reviewed to obtain information concerning incidents involving releases of petroleum or hazardous materials at the subject property. The purpose of these searches is to identify potential environmental conditions in connection with the property. The local fire department, Town code enforcement, Town tax assessor's office, and representatives of past/present owner or occupants were also contacted and interviewed. This research should not be considered inclusive of all regulatory records, but only those records that were publicly available, practically reviewable, and reasonably ascertained.

7.1 LOCAL ENVIRONMENTAL REVIEW AND INTERVIEWS

Coincident to conducting the site visit, local files and documents were reviewed at the Sanford Town Hall. In addition, a number of interviews were conducted with Town officials and other knowledgeable individuals in order to confirm historical use files and gain a better perspective on past and current conditions of the site. Under the ASTM guidelines, interviews with past and present owners, operators, and occupants of the facility for the purpose of gathering information regarding the potential for contamination of the facility are required. The following presents a concise summary of the files reviewed and the interviews conducted.

Subject Property Representative

Mr. Bob LaChance, the property management subcontractor and owner designated property representative, was interviewed during our site visit on August 7, 2007 to obtain information about the historical property use and current use of the subject property. According to Mr. LaChance, the building has been occupied by a variety of businesses that have performed woodworking, salvage operations, custom motorcycle production, wood product finishing, and a variety of other operations. Mr. LaChance indicated that hazardous materials observed within the building have been collected over the years from remnants left by former tenants and have not been produced by the current operations within the building. Mr. LaChance provided access to the building and grounds and elaborated on observations previously discussed in Section 4.

Town of Sanford Tax Assessor's and Code Enforcement Offices

A clerk at the Town of Sanford's Tax Assessor's office was interviewed regarding records specific to the ownership of the subject property on August 7, 2007. According to the clerk, all ownership records available are located online and no historical tax cards are stored at the Town of Sanford Town Hall. Ownership information obtained online for the subject property indicates Gateway Properties, LLC obtained the property from Trustees of The Stenton Trust on July 22,

1999. The Stenton Trust obtained the property on December 28, 1959 from Lawrence L. Reeve. Lawrence L. Reeve owned the property since at least 1950. The Town of Sanford does not keep the historic tax cards on file for review.

Records for the subject property were reviewed at the Town of Sanford Code Enforcement Office on August 7, 2007. Records on file for the subject property at the time the Town research was completed include building permits, information regarding prior building renovations, certificates of occupancy, and letters regarding zoning issues and code violations. No records documenting hazardous materials storage were observed in the Code Enforcement Office file.

Town of Sanford Fire Department

The Town of Sanford Fire Department was contacted to determine if any environmental information existed for the subject property within their records. An interview was conducted with Fire Marshall George Davis on August 22, 2007. Fire Marshall Davis stated that to the best of his knowledge there have been no reports of spills or releases of hazardous materials at the facility; however, he did state that they have been working with the owners of Stenton Trust for about four years to remove the hazardous materials that were being stored inside and outside. Fire Marshall Davis has been with the department for approximately 7 years.

7.2 STATE ENVIRONMENTAL REVIEW

The State of Maine maintains a number of environmental databases for USTs, solid waste facilities, uncontrolled hazardous waste sites and remedial programs. In addition, the Maine DEP maintains a file of spill sites. The following paragraphs provide the results of the State of Maine database searches.

State Spill Sites

The State of Maine through the Maine DEP maintains a list of all petroleum and hazardous material spills reported in the State of Maine, including leaking UST sites. It should be noted that Maine DEP records begin around 1974; therefore, any spills occurring prior to this date would not be recorded by the Maine DEP. Recognizing that the property has been used as an industrial facility since the late 1800s, there is the potential for spills to have occurred on the property.

Table 2 summarizes spills that occurred on or within 0.25-miles of the subject property. Two spill reports were identified for subject property. Spill No. P-812-06 was filed for the subject property; however, the file had not been finalized by the Maine DEP and therefore was not

available for review. The next spill listed for the subject property is Spill No. P-111-95, that documented the removal of three USTs from the subject property. This removal was discussed previously in Section 4.3 Underground and Aboveground Storage Tanks.

Spill reports for the subject property are included in Appendix F.

Master Underground Storage Tanks Listing

According to the Master UST List maintained by the Maine DEP, there are four USTs registered for the subject property; however, three have been removed and only one is currently active. The UST is a steel 8,000-gallon No. 6 fuel oil UST with secondary containment and continuous electronic monitoring. This tank is currently up to date with its registration (as of March 7, 2007) and has continuous electronic monitoring. This tank is not currently in use at the property. The USTs were discussed previously in Section 4.3 *Underground and Aboveground Storage Tanks*. No additional USTs are listed for the subject property.

State Uncontrolled Sites

The Maine DEP Bureau of Remediation and Waste Management maintains a list of Uncontrolled Hazardous Substance Sites, updated May 2007. Sites on this list include both State Active and State Inactive sites. Sites listed as Maine Active Sites are being investigated by the State or will be investigated when priorities allow. Maine Inactive Sites include sites that were reported to the Maine DEP but were referred to other departments, agencies, programs, etc., or were determined to be sites where no further action was warranted.

The Goodall Mill is listed as a State Uncontrolled Site. The subject property was formerly considered part of the Goodall Mill complex; however, the Goodall Mill property currently refers to the property directly adjacent to the subject property. Therefore the subject property is not listed as a State Uncontrolled Site. The Goodall Mill Site will be discussed in Section 8.1 *State Environmental Review – Uncontrolled Sites*.

VRAP Sites

The Maine Voluntary Response Action Program (VRAP) is a state program that promotes investigation, remediation and redevelopment of contaminated properties by offering liability insurances/protections from state enforcement actions. For a site to be included in the VRAP program, an application must be completed, which includes documentation of all previous ESAs and environmental investigations that have occurred on the site. Following review and acceptance of previous investigations and a Remedial Action Plan (if necessary), the Maine DEP

will issue a "No-Action Assurance" letter, stating that upon site remediation to Maine DEP satisfaction, the Maine DEP will assure the parties that no future enforcement action will be taken regarding the issues identified in the application for the site. Following satisfactory completion of all response actions required in the plan, the Maine DEP will issue a "Certificate of Completion," acknowledging the applicant has satisfactorily completed all necessary response actions. The certificate of completion includes the applicable liability release provisions for either a complete or partial cleanup. The no action assurance and certificate of completion generally apply to the party responsible for implementing the cleanup work and the parties providing financing to the persons completing the cleanup work.

The subject property is not listed as a VRAP site.

Solid Waste Facilities

The Maine DEP maintains a current listing of licensed solid waste facilities. The subject property is not listed with the Maine DEP as a solid waste facility.

7.3 FEDERAL ENVIRONMENTAL REVIEW

The USEPA maintains a number of databases that track properties and facilities that are regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Resource Conservation and Recovery Act (RCRA).

CERCLA, CERCLIS-Listed, and NPL Sites

CERCLA is a federally established program that created a fund to identify hazardous waste sites for remediation. The fund is known as Superfund. The Comprehensive Environmental Response, Compensation Information System (CERCLIS) list is a compilation of known and/or suspected uncontrolled or abandoned hazardous waste sites that are eligible for funding under Superfund. The Superfund program includes Federal Facility sites, short- and long-term cleanup sites, National Priority Listing (NPL) sites, Sites Awaiting NPL Decisions (SAND), and Archived Superfund sites.

Federal Facility sites are hazardous waste sites where the Department of Defense is the lead agency in the investigation or remediation of the site.

Hazardous waste sites that do not require a long-term cleanup process are considered short-term cleanups, or "removal actions". Although the cleanup process for these sites may not be as

lengthy as for long-term cleanups, these sites may still affect the health and environment of those who live near the site.

Long-term cleanup sites are often caused by years of polluting and may take several years, even decades, to remediate. The most serious uncontrolled or abandoned hazardous waste sites identified as candidates for long-term clean up are listed on the NPL.

SAND sites have had site assessments performed, but a decision regarding NPL proposal has not been recorded. SAND sites include sites that have been assessed by the Superfund program, are now being addressed under state program authorities, or are in various stages of assessment and cleanup by federal or state agencies.

The Archive database also contains information on sites that have been removed and archived from the inventory of Superfund sites. Archive status indicates that to the best of the EPA's knowledge, Superfund has completed its assessment of a site and has determined that no further steps will be taken to list that site on the NPL. These sites are also referred to as CERCLA No Further Response Action Planned (NFRAP) sites.

The subject property is not listed as a CERCLA, NPL, Federal Facility, SAND, or Archived Superfund site.

RCRA and RCRA CORRACTs

Sites listed in the EPA RCRA database are sites that are hazardous waste treatment, storage, and disposal (TSD) facilities, or generate small or large quantities of hazardous wastes.

Accidents or other activities at RCRA facilities can result in the release of hazardous waste or hazardous constituents to the environment. The RCRA Corrective Action program (CORRACT) requires these facilities to conduct investigations and cleanup actions as necessary. Facilities under the CORRACT program need to implement necessary corrective action as part of the process to obtain a permit to treat, store, or dispose of hazardous waste.

The subject property is not currently listed as a TSD facility or a CORRACT facility.

Encore Shoe, a former occupant of the subject property, was listed as a small quantity generator. According to information obtained concerning this site, the property is currently listed as being in compliance (as of July 19, 2007) with no violations in the last three years; however, Encore Shoe no longer occupies the subject property.

The Stenton Trust Expanded Rubber Products facility is listed on the Enforcement & Compliance History Online (ECHO) database maintained by the EPA as an Air Facility System for the Clean Air Act (CAA). The program office defines each CAA Source ID and the associated permits as being Federally Reportable or Non-Federally Reportable. Under the CAA, federally reportable permits include majors, synthetic minors, NESHAP minors, and other minors in High Priority Violation (HPV), or with recent enforcement actions. The Clean Air Act requires that all federally reportable sources be tracked in a data system, which is the Air Facility System (AFS). The subject property is listed as a non-federally reportable facility; however, Stenton Trust Expanded Rubber Products no longer operates at the facility. No further information was identified for either of these two companies or the subject property during the Maine DEP file review.

ERNS Sites

The Emergency Response Notification System (ERNS) was a database used to store information on notifications of oil discharges and hazardous substances releases. The ERNS program is a cooperative data sharing effort among the EPA Headquarters, the Department of Transportation (DOT) Research and Special Programs Administration's John A. Volpe National Transportation Systems Center, other DOT program offices, the ten EPA Regions, and the National Response Center (NRC). ERNS data provides comprehensive data compiled on notifications of oil discharges and hazardous substance releases. The ERNS website was redesigned and the data now resides at the NRC. The primary function of the NRC is to serve as the sole national point of contact for reporting all oil, chemical, radiological, and biological discharges into the environment anywhere in the United States and its territories.

The subject property is not listed as an NRC/ERNS site.

7.4 ENVIRONMENTAL LIENS

A third party, such as a state or federal government agency, may place environmental liens on a property in order to recover cleanup costs that were incurred by that third party. The existence of a recorded environmental cleanup lien on a property is an indication that environmental conditions either currently exist or previously existed on a property. The existence of an environmental cleanup lien should be considered an indicator of potential environmental concerns, and should be a basis for additional environmental investigations on the subject property to determine the potential existence of ongoing or continued releases of hazardous substances.

An environmental lien search was completed in August 2007 by FirstSearch Technology Corporation. No environmental liens were found to exist for the subject property. A copy of the report is included in Appendix D.

7.5 INSTITUTIONAL CONTROLS

Institutional controls or environmental-related covenants for a property are put in place to minimize the potential for human exposure to existing environmental conditions on that property by limiting land or resource use. Types of institutional controls may be referred to as land-use controls or activity and use limitations, and these controls may be in the form of deed restrictions, zoning restrictions, building or excavation permits, well drilling prohibitions, easements, or covenants. A property owner wishing to maintain liability protections under CERCLA must comply with any existing land use restrictions and maintain any existing institutional control employed at the site in connection with a response action.

A review of property deeds by FirstSearch Technology Corporation, Town documents (zoning, code enforcement, etc.), and Maine DEP records revealed no institutional controls on the site.

No other records of deed restrictions, zoning or building restrictions, well drilling restrictions, easements, or covenants were found by FirstSearch Technology Corporation.

7.6 PROPERTY VALUE AND RETAIL PRICE

ASTM Standards for Phase I ESAs require a comparison and determination of whether or not there is a differential between the purchase price of a property relevant to the fair market value of the property, assuming that the property had no environmental conditions, or stigmas, associated with it at the fair market price. If the price paid for the property is significantly below the fair market value, it may be a sign that there are environmental conditions or contamination associated with the subject property.

Based on a review of the identified environmental conditions associated with the subject property during the ESA, no information indicating that environmental conditions or stigmas at the subject property have affected its fair market value. This does not indicate that there may be contamination onsite or other environmental conditions of which we are not currently aware.

8. AREA REGULATORY INFORMATION

Files of the Maine DEP Bureau of Oil and Hazardous Materials Control and the USEPA Region 1 were reviewed to obtain information concerning incidents involving releases of oil or hazardous materials for properties in the vicinity of the subject property. The purpose of these searches is to identify potential environmental conditions in connection with area properties. In addition, other state and federal regulatory lists, the local fire department, and Town offices were consulted. This research should not be considered inclusive of all regulatory records, but only those records that were publicly available, practically reviewable and reasonably ascertained.

8.1 STATE ENVIRONMENTAL REVIEW

Spill Reports

The Maine DEP maintains a list of all petroleum and hazardous material spills reported in the State of Maine, including leaking UST sites. Twenty spills were reported within a 0.25-mile radius of the subject property, and are summarized in Table 2. Two spills were filed for the subject property, which were discussed in Section 7.2. Recognizing that several spill reports at the Maine DEP did not contain addresses or other geographic references, the potential exists for additional spills to have occurred within a 0.25-mile radius of the subject property. It should also be noted that several spill reports were filed that did not report actual spills and therefore, were not summarized in the table.

Spill P-597-94 occurred directly adjacent to the subject property on July 26, 1994. Contamination was encountered in a test pit during a sewer line and storm drain excavation. A 550,000-gallon, concrete No. 6 fuel oil UST was identified on the property, which was crushed and filled in place by Shaw Brothers in the summer of 1994. Approximately 1,650 tons of oil contaminated soil was removed from the property and disposed of at ARC. Oil contaminated soil and groundwater is known to remain on-site. A thick lens of oil-saturated soils was identified at the corner of High and Spruce Street. This spill report was updated by Steve Brezinski of the Maine DEP in October 2006 and referred to Spill No. P-681-2006, which also was not available for review at the time of the file review.

Thirteen of the twenty-one spill reports filed for the area surrounding the subject property consisted of more than 50-gallons, five of which were over 400-gallons. The majority of the spills reported some sort of remedial activities; however, the majority of the spills reported that contamination remained on-site. Recognizing that these spill locations reported sizeable spills, that contamination remained in place, and the close proximity to the subject property, the potential exists for these spills to impact the subject property.

Refer to Table 2 for summaries of spills that occurred within 0.25-miles of the subject property.

Underground Storage Tanks

Four properties located within 1,000-feet of the subject property formerly or currently maintain registered USTs. The adjacent properties identified on the Master UST List maintained by the Maine DEP include Aerofab, located at 1 High Street, Standard Auto located at 8 River Street, Riverside Service Center located at 20 River Street, and Wasco Products located on Pioneer Avenue.

Aerofab located at 1 High Street formerly maintained one 1,000-gallon No. 2 fuel oil UST (Registration No. 12220). This UST was removed in 1991. No information was provided in the tank file to confirm or dismiss the presence of contamination during this removal.

Big A Auto Parts formerly maintained a 500-gallon No. 2 fuel oil UST (This UST was not registered). This site is located across River Street from the subject property. The UST was removed in December 1994 by Les Wilson & Sons. No information was provided in the file concerning the presence or absence of contamination during the UST removal.

Riverside Service Center located at 20 River Street currently or formerly maintained seven USTs (Registration No.12356). Two active 6,000-gallon gasoline USTs are located on the subject property. These tanks were installed in 1999 and are currently in compliance with regulations. Five USTs have been removed from the property: one 4,000-gallon premium gasoline, one 3,000-gallon regular gasoline, one 3,000-gallon premium gasoline, one 550-gallon waste oil UST, and one 1,000-gallon fuel oil UST.

Wasco Products located on Pioneer Avenue was formerly part of the former Goodall Mill property and was more recently occupied by Pioneer Plastics, which formerly maintained three chemical storage USTs (Registration No. 18004). One 2,400-gallon isopropyl alcohol UST and two 6,280-gallon phenolic formaldehyde resin USTs. Contamination was identified in the vicinity of the USTs when they were removed by Clean Harbors in 1992. A groundwater sample was collected from the excavation which identified phenol and isopropyl alcohol in the groundwater; however, the Maine DEP stated that although it is realized that contamination remains on the site, no further action was required by the Maine DEP.

UST information for these above sites are located in Appendix C.

State Uncontrolled Sites

Four sites within 1.0-mile of the subject property are listed on the Maine DEP List of Uncontrolled Hazardous Substance Sites as Active or Inactive sites.

The Aerofab, Inc. site is a State Uncontrolled site currently in review by the Maine DEP. Aerofab is located across High Street from the subject property. The site was formerly used as an airplane and airplane component manufacturer, which operated from 1963 until 2002. The property was identified as a site due to its storage and improper disposal of hazardous materials.

Brooks Woolen Mill is located on Dale Street, approximately 0.5-miles east of the subject property and is listed as a State Uncontrolled Site. The site is currently in review but was listed due to historical use as a woolen mill.

The Sanford Municipal Landfill is listed as a State Uncontrolled site which is currently undergoing operations and maintenance. The site is located approximately 0.75-miles east of the subject property on Rushton Street. Below is the history of the property as summarized from the USEPA's website:

The Town of Sanford has owned the property since 1954; earlier ownership history and property usage is unknown. The landfill was used for the disposal of municipal, commercial, and industrial waste from the early 1950s until October 1982. According to a 1995 Final Site Inspection Prioritization (SIP) report prepared by the Maine Department of Environmental Protection (ME DEP), commercial and industrial facilities that used the landfill included textile facilities, metal finishing facilities, shoe manufacturers, producers/fabricators of plastics, and electronic component manufacturers.

Landfill operations reportedly included waste disposal in the on-site wetlands. During the 1995 SIP on-site reconnaissance, remains of 55-gallon drums and other debris were observed in the wetlands and in the wooded area near the southern stream. The landfill was closed to domestic waste in 1981. In May 1982, the Town of Sanford built a transfer station and closed the remainder of the landfill, except for the demolition debris area. Disposal of demolition debris was reportedly limited to construction debris, stumps, and brush.

Several investigations have been conducted at the landfill since 1978. Volatile organic compounds (VOCs) and metals have been detected in the on-site groundwater samples and in surface water and sediment samples collected from Mousam River. In 1990, a

Landfill Gas Assessment and Public Health Risk Characterization was performed as part of a Phase I investigation. VOCs and methane were detected in soil gas samples collected within the landfill area; in surface water samples collected from visibly contaminated streams bordering the landfill; and in air samples collected from landfill gas monitoring wells bordering the landfill, on-site buildings, the ball field bleacher area, and several nearby residences.

In 1994, ME DEP collected surface water and sediment samples from the wetland abutting the northwestern border of the landfill and from Mousam River. Elevated levels of VOCs, semivolatile organic compounds (SVOCs), and metals were detected in the surface water and sediment samples.

The depth to groundwater at the SML property ranges from 13 to 29 feet below ground surface. Refuse is reportedly located below the water table in the majority of the landfill. Groundwater flow across the landfill area at the water table is to the west and northwest. Contaminated groundwater is discharging to the Mousam River, the southern stream, and associated bordering wetlands. A total of 18 monitoring wells exist on site. VOCs, SVOCs, and metals have been detected in the on-site groundwater.

The Town of Sanford investigated the SML property with oversight by ME DEP. Remedial actions were initiated at the property, including removal of drums, re-routing drainage, and capping portions of the property. ME DEP will continue to work with the Town of Sanford in developing additional remedial measures.

Wasco Products, located on Pioneer Avenue, is listed as an Uncontrolled Site which is currently in the operations and maintenance phase. The site was historically a mill, but was more recently used to process polyvinyl chloride (PVC), thermoplastic, vinyl and rubber components for the manufacturing and assembly of windows and doors. Investigations identified USTs in the ground, which were discussed in the previous section. It is known that contamination remains on site from historic property use; however, the Maine DEP indicated that the site would be classified as a Baseline-2 site, and no contamination above the Baseline-2 criteria was known to exist.

Uncontrolled site information is included in Appendix G.

VRAP

Four VRAP sites are located within a 0.50-mile radius of the subject property.

The Goodall Mill, located at the corner of Spruce and High Streets is listed as a VRAP site and is located directly adjacent (downgradient) to the subject property. A 550,000-gallon concrete oil tank is situated on the property, which was not properly abandoned in place. The subject property was formerly part of the Goodall Mill facility. The facility was given a No Action Assurance Letter with the requirement that the work plan discussed with the Maine DEP concerning properly abandoning the oil tank in place occur. Also, it is understood that the property will not be used for residential purposes and groundwater extraction wells cannot be installed on the property. A certificate of completion was to be issued when final documentation for completion of the required activities is received by the Maine DEP.

The Sanford Mill is located on the south side of the Mousam River approximately 0.25 miles southeast of the subject property. The former tenants of the subject property included: the Goodall Manufacturing Company, a manufacturer of blankets, curtains and fabrics; Eastern Plastic Corporation, a manufacturer of plastic heels for women's shoes; Springvale Press and Machine Company, a company that manufactured and assembled light bulbs; and Jotko, a plastics manufacturer. The owners of the Sanford Mill received a Notice of Violation in July 2003 concerning hazardous materials stored on the subject property. This led to several investigations and a remedial action plan to address the issues identified at the site. Sediment samples were collected from the floor drains and sumps and the floor drains were dye tested to determine the discharge location, which was determined to be the river. All hazardous materials were sampled and removed by Clean Harbors and properly disposed of and the site was submitted to VRAP in December 2004.

Wasco Products is located on Pioneer Avenue, southeast and down-gradient from the subject property is listed as a VRAP site. This site was discussed previously in Section 8.1 *State Environmental Review – Uncontrolled Sites*. The No Further Action Assurance Letter was completed for the property on February 27, 2006 with the condition that future redevelopment will include appropriate characterization, handling, and disposal of all containers encountered during the removal of existing structures, that the property be used for industrial purposes, that all soils encountered above the Baseline-2 standard will be removed from the site and disposed of at an appropriate facility, and that no groundwater extraction wells will be installed on the property.

Lesifco, Inc. is located at 61 Emery Street, approximately 0.45 miles southeast and down-gradient from the subject property. A Phase I ESA and Phase II Investigation were completed

for the property which identified low levels of PAHs and TPH in the subsurface soils at the site. Groundwater on the site is known to be impacted by TCE above the Maine Maximum Exposure Guidelines. The Maine DEP stated that no remedial actions are required providing that excavation activities are prohibited without approval from the Maine DEP, that groundwater monitoring be conducted two times per year for three years to confirm the decreasing trend in contaminants, and that that no groundwater extraction wells be installed on the property.

Information pertaining to the previously discussed VRAP sites is included in Appendix H.

Solid Waste Facilities

The Sanford Municipal Landfill is located approximately 0.75-miles east of the subject property on Rushton Street. This landfill is also listed as an Uncontrolled Site and was discussed previously in Section 8.1 *State Environmental Review – Uncontrolled Sites*.

No additional landfills are located within a 1.0-mile radius of the subject property.

8.2 FEDERAL ENVIRONMENTAL REVIEW

NPL, SAND, CERCLIS and CERCLIS NFRAP

According to the USEPA, no properties located within a 1.0-mile radius of the site are currently listed as a NPL, SAND, CERCLIS, or CERCLIS NFRAP site. Aerofab is listed as an Archived CERCLIS site; this site was discussed previously in Section 8.1 *State Environmental Review - Uncontrolled Sites*.

RCRA and RCRA CORRACTs

Two RCRA facilities are located within the applicable search radii. Aerofab is located across High Street from the subject property and is listed as a small quantity generator. Currently Aerofab is in compliance with regulations. Standard Auto Supply is located across River Street from the subject property and is listed as a conditionally exempt small quantity generator. According to information the site is in compliance with all regulations as of July 19, 2007.

9. SIGNIFICANT ASSUMPTIONS AND DATA GAPS

The ASTM Standards for Phase I ESAs require the identification of data gaps that may affect our ability to identify potential environmental conditions on the site, to further identify the sources of information consulted to attempt to fill these data gaps, and the significance of the data gap with regard to the ability to identify potential environmental conditions onsite.

- The custom motorcycle shop located in the southwest portion of the basement was not accessible during the site visit on August 7, 2007.
- One recent spill report was filed for the subject property or the adjacent property which could not be finalized prior to the completion of this report.
- No additional significant assumptions were made, and no additional significant data gaps were identified that may have affected our ability to identify potential environmental conditions onsite.

10. RECOGNIZED ENVIRONMENTAL CONDITIONS

JEK conducted a Phase I Environmental Site Assessment for the Stenton Trust property located in Sanford, Maine. This Phase I ESA has been completed in general conformance with the scope and limitations of the ASTM E 1527-05 Standards. Any exceptions to, or deletions from, this process are described in Section 13. This assessment has revealed the following *recognized environmental conditions*:

- Several previous environmental site assessments completed for the subject property identified contamination in several areas of the property due to historical use of the site. These included primarily petroleum contamination in the area of the former underground storage tanks (USTs) located along the northern portion of the building and the onsite product fill line connected to a former 550,000 gallon petroleum UST located on the adjacent property as well as chlorinated solvent contamination in the northern portion of the property.
- Historical use of the property as a textile mill from the late 1800s into the late 1900s may have impacted surficial and subsurface soils in additional areas of the property.
- Potential asbestos-containing materials and potential lead-based paint were observed throughout the mill building and may represent a threat to human health through inhalation and ingestion.
- Thirteen electrical transformers and at least three capacitors that potentially contain PCBs were observed in interior locations within the mill building and in exterior areas on concrete pads.
- Potential PCB-containing oil staining was observed in a small electrical room accessible through the southeast building access tunnel, and on the exterior transformer storage pad.
- Significant oil staining was observed in several areas of the basement including the eastern storage area, in the vicinity of a large air compressor, and in the vicinity of the elevator lift.
- An oil spill was observed outside the eastern portion of the mill building in the vicinity of a "Process Oil" fill pipe. Reportedly this spill is in the process of being remediated.
- Hazardous materials were stored in various locations throughout the interior of the building, some of which included several bags of sulfur powder, a variety of paints, stains, and lacquers, consumable quantities of lubricants and cleaners, several 55-gallon drums of boiler chemicals, several open containers of waste oil, and four 5-gallon containers of adhesive. Some of the containers appeared to be in poor condition. It should be noted that ten 55-

gallon drums containing unspecified substances were observed outside of the building adjacent to the loading dock.

- Some hazardous materials from within the building have been consolidated into the "Hazardous Waste Storage Room" (see Figure 2). Ten 55-gallon drums of neoprene-latex adhesive, five 55-gallon drums of oil contaminated soil, two 55-gallon drums of transformer oil, and approximately 6 various sized drums of various chemicals were observed in this area. Additionally, a rolling tote of waste computer components, six canisters of refrigerant, and several one to five gallon buckets of unknown materials were observed in this room. Many containers appeared old and in poor condition.
- Several floor drains were observed in the building; however, the discharge locations of the floor drains are not currently known.
- A large boiler chimney and boiler house formerly occupied the subject property near the eastern border. A 550,000-gallon fuel oil UST was used to run the boilers in the boiler house for the Goodall Mill, this UST was formerly located on an adjacent parcel (east) of land but was abandoned-in-place. During the abandonment, contamination was identified and a large amount of contaminated soil was removed from the areas surrounding this UST; however, contamination is known to remain in place and could potentially impact the subject property.
- A recent spill report (P-812-06) was filed for the subject property that could not be reviewed prior to the completion of this Phase I ESA. A previous spill report (P-111-95) filed for the removal of three USTs from the subject property indicated that contamination remained on the subject property.
- Universal wastes such as fluorescent bulbs, computer monitors, and lighting ballasts were observed in many locations throughout the building. Some storage locations are unsecured and bulbs and computer components are loosely stacked and prone to breaking.
- Paints, stains, and lacquers were observed to be stored throughout the building. If these products are no longer needed they should be removed from the property and properly disposed of. If these products are to be used in the future they should be consolidated and stored in a secure area.
- Recognizing the 8,000-gallon fuel oil UST is not planned to be used in the future, it should be properly removed.

De Minimis Environmental Conditions

Based on our review of site historical files and observations during our site visit on August 7, 2007, JEK identified the following *de minimis environmental conditions* at the subject property.

- Encore Shoe, a former occupant of the subject property is listed as a small quantity hazardous waste generator. When a generator ceases operations at a facility, a RCRA closure in accordance with Maine Chapter 851, Section 11 of Maine's Hazardous Waste Management Rules is required to close out the hazardous waste generator id.

11. OPINION AND RECOMMENDATIONS

The ASTM Standards require that the environmental professional determine the degree of obviousness of the presence or likely presence of contamination, releases, or other environmental conditions onsite, and the ability to detect that contamination. We have concluded that there are obvious environmental conditions indicative of potential contamination and past releases at the subject property. Recognizing the historical use of the property as a textile mill, the historical material releases at the site and surrounding properties, and the potential for the site to be redeveloped, it is JEK's opinion that the following recommendations be performed. In order to maintain *innocent landowner* or *Bona Fide prospective purchaser* liability protection, under CERCLA a purchaser must demonstrate appropriate care, which typically will entail the completion of these recommendations.

- Additional investigations are required to further delineate the known contamination on-site (e.g. test pits, soil borings, etc.) and potential contamination in other areas (e.g. garage in northern portion of the property, the boiler chimney, boiler house, transformers, etc.), and potential migration of contamination off-site in order to assess future reuse options for the property.
- Painted surfaces, ceiling tiles, pipe insulation, and other suspect materials should be sampled and tested to confirm or dismiss the presence of lead-based paint and/or asbestos on the subject property prior to any redevelopment work performed on the site. Identified lead or asbestos-containing materials must be abated, as necessary, according to State and Federal regulations.
- Samples should be collected from all liquid-containing electrical transformers and capacitors and laboratory analyzed to confirm or dismiss the presence of PCBs.
- Wipe samples should be collected and laboratory analyzed for PCBs from stained areas observed in the vicinity of potential PCB containing equipment.
- All containers containing unknown hazardous materials identified on the property should be tested to confirm their contents and then stored in a designated secure area until they can be properly disposed of according to State and Federal regulations. All labeled hazardous materials that are no longer required for use at the property should be properly disposed of.
- The discharge location of the floor drains should be confirmed and the floor drains permanently plugged if they are not needed for future use. If the discharge is to subsurface environment, then additional investigations will be warranted. If the floor drains are required to be maintained for future use and are found to discharge to a location other than the

sanitary sewer, hazardous material and petroleum products should not be located in the area of the drains.

- Stained soil observed in the area of the "Process Oil" fill pipe outside the eastern portion of the building should be delineated and properly remediated according to State and Federal regulations.
- The oil staining and spills observed within the building during the site visit should be delineated and properly remediated according to State and Federal regulations.
- The utility trench located in the basement of the building could not be inspected during the site visit due to the size of the covers. These trenches should be inspected to confirm or dismiss the presence of recognized environmental conditions.
- All universal wastes identified throughout the building should be consolidated and stored in a secure area until they can be properly disposed of according to State and Federal regulations.
- Paints, stains, and lacquers were observed to be stored throughout the building. If these products are no longer needed they should be removed from the property and properly disposed of. If these products are to be used in the future they should be consolidated and stored in a secure area.
- Recognizing the 8,000-gallon fuel oil UST is not planned to be used in the future, it should be properly removed.

Based on the *de minimis environmental conditions* observed at the site, Jacobs Edwards and Kelcey recommends the following:

- The hazardous waste generator status for Encore Shoe should have been closed out when they left the property. Therefore, JEK recommends completing a hazardous waste closure for Encore Shoe.
- JEK recommends enrolling the property in the Maine DEP Voluntary Response Action Program to obtain liability assurances for the investigation and cleanup of recognized environmental conditions at the subject property.

12. REFERENCES

The Maine DEP files located in Augusta, Maine, the USEPA website, and various other sources including Geological and historical maps were researched for the subject property and surrounding sites.

LOCAL RESOURCES

- **Town of Sanford Official Website.** <http://www.Sanfordmaine.org>
- **Town of Sanford Assessors and Code Enforcement Office.** August 7, 2007.
- **Maine Department of Environmental Protection, Augusta, Maine office.** August 9, 2007.

Maine DEP RESOURCES

- **Maine DEP Applications for Solid Waste Facilities.**
<http://www.maine.gov/dep/rwm/data/pdf/swfac.pdf>
- **Maine DEP Division of Remediation Active Landfill List.** Landfill facilities licensed in the State of Maine. <http://www.maine.gov/dep/rwm/solidwaste/landfillactive.xls>
- **Active and Out of Service Registered USTs Including Tanks That Have Not Been Properly Abandoned.** Updated April 2007.
<http://www.maine.gov/dep/rwm/data/pdf/activeoutofservicetanks.pdf>
- **Maine DEP Master Underground Storage Tanks List.** Updated August 2007.
<http://www.maine.gov/dep/rwm/data/pdf/regundtanks.pdf>
- **Maine DEP Division of Remediation Master Site List.** This list represents the public record of past and current sites located in Maine that are in the Voluntary Response Action Program, the Brownfields Program, the Landfill Closure Program, the Federal Facilities Program, the Superfund Program, and/or the Uncontrolled Sites Program.
<http://www.maine.gov/dep/rwm/data/pdf/allsiteslatlong.pdf>
- **Maine DEP Spill File Review.** Files reviewed at the Augusta, Maine DEP offices on August 9, 2007.

EPA RESOURCES

- **CERCLIS Hazardous Waste Sites.** Information obtained from USEPA website. <http://cfpub.epa.gov/supercpad/cursites/srchsites.cfm>
- **CERCLIS NFRAP.** Information obtained from USEPA website. <http://cfpub.epa.gov/supercpad/cursites/srchrslt.cfm?start=1&CFID=481008&CFTOKEN=69470108&jsessionid=363045257c645c143453TR>
- **RCRIS Database.** Information obtained from USEPA website. http://www.epa.gov/enviro/html/rcris/rcris_querv_java.html
- **Superfund Database.** Search of NPL, SAND, and SHORT sites. Information obtained from USEPA website. [http://yosemite.epa.gov/R1/npl_pad.nsf/SelectedByType?OpenForm&View=Site%20Awaiting%20NPL%20Decision%20\(SAND\)](http://yosemite.epa.gov/R1/npl_pad.nsf/SelectedByType?OpenForm&View=Site%20Awaiting%20NPL%20Decision%20(SAND))

ADDITIONAL RESOURCES

- **US Fish and Wildlife Services National Wetlands Inventory Wetlands Mapper.** <http://wetlandsfws.er.usgs.gov/NWI/index.html>
- **Bedrock Geological Map of Maine.** Maine Geological Survey, 1985.
- **Historical Sanborn Maps.** University of Southern Maine Library.
- **Historical USGS Maps of New England.** University of New Hampshire Library, Documents Department & Data Center. <http://docs.unh.edu/nhtopos/nhtopos.htm>
- **Significant Sand and Gravel Aquifer Maps.** Maine Geological Survey. <http://www.maine.gov/doc/nrimc/mgs/mgs.htm>
- **Surficial Geological Map of Maine.** Maine Geological Survey. <http://www.maine.gov/doc/nrimc/mgs/mgs.htm>
- **USGS Topographic Map.** Sanford, Maine Quadrangle.

13. LIMITATIONS, EXCEPTIONS, AND DEVIATIONS

This report has been prepared as part of an agreement between Jacobs Edwards and Kelcey and the Southern Maine Regional Planning Commission. This agreement was established in order to provide the Southern Maine Regional Planning Commission with information upon which they can rely concerning the existence or likely existence of various environmental contaminants on or adjacent to the property evaluated.

The report does not provide sufficient information to unequivocally determine that no hazardous waste contamination is present at the site. Additional work beyond that completed for this study would be necessary to provide such information. Further, this report is not an audit for regulatory compliance or a detailed condition survey for the presence of asbestos, lead paint, PCBs, radon or any other pollutant specific compound.

Our conclusions regarding this site are based on our interpretation of site historical land use and observations of existing site conditions during our field reconnaissance visits. The results of this study must be qualified in that no borings, soil or groundwater sampling or chemical testing were conducted as part of this study. Therefore, our conclusions regarding the condition of the property do not represent a warranty that the facility, parking areas, adjacent properties, etc., are of the same quality as may be inferred from observable site conditions and readily available site history files.

JEK performed this Phase I ESA in general conformance with the ASTM Standard Practice E 1527-05 and ASTM Standards. No exceptions or significant deviations were made to this practice during the completion of the ESA.

14. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

The following Environmental Professionals performed this Phase I ESA in conformance with ASTM Standard Practice E 1527-05 and AAI Standards. The following individual(s) meet the qualifications for individuals completing or overseeing all appropriate inquiries, and possess sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding the existence of environmental conditions on the subject property. Any work completed on this ESA by an individual who is not considered an environmental professional was completed under the supervision or responsible charge of the environmental professional.

Judd Newcomb
Primary Author

Robert Patten, P.E.
Office Manager

The Appendices (A through H) to this report [“Phase I Environmental Site Assessment – Rev 1, Stenton Trust, 13 River Street, Sanford, Maine”, prepared by Jacobs, Edwards and Kelcey, 27 September 2007] are not included as part of the Administrative Record File.

APPENDIX A
PREVIOUS INVESTIGATIONS

APPENDIX B
SITE PHOTOGRAPHS

APPENDIX C

**SUBJECT PROPERTY UNDERGROUND
STORAGE TANK INFORMATION**

APPENDIX D

FIRSTSEARCH TECHNOLOGY ENVIRONMENTAL LIEN SEARCH

APPENDIX E

SANBORN FIRE INSURANCE MAPS

APPENDIX F

SUBJECT PROPERTY SPILL REPORT INFORMATION

APPENDIX G
UNCONTROLLED SITE INFORMATION

APPENDIX H
VRAP SITE INFORMATION
