

Town of Sanford, Maine

R01-12-C-031

Planning Department

917 MAIN STREET SUITE 300, SANFORD, MAINE 04073
(207) 324-9150 FAX (207) 324-9166

November 28, 2011

Environmental Management Support, Inc.

Attn: Mr. Donald West

8601 Georgia Avenue, Suite 500

Silver Springs, MD 20910

Phone: (301) 589-5318

Transmittal Letter

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, ME

Dear Mr. West

The Town of Sanford, Maine is located on the Mousam River at the foothills of the White Mountains in the Southwestern corner of Maine. We have a long history of turning significant challenges into opportunity. Sanford thrived in the late 1800s when the Goodall Mills dominated the downtown portion of Sanford. However, when the mill closed in the 1950s, more than 3,500 Sanford residents lost their jobs. Sanford turned this mill closing into opportunity and recruited several large industrial facilities to relocate to the area.

With the increase of globalization in the 1980s and 1990s, the industrial base within Sanford dwindled as businesses, including those recruited in the 1950s, slowly relocated or went out of business all together. With the loss of industry, Sanford has seen an increase in the unemployment rate, which is currently the highest in the southern part of Maine at 11.4 percent (January 2011, Micropolitan NECTA data). The loss of good paying, stable manufacturing jobs has also elevated the poverty rate within Sanford which is currently at 15.2 percent (2005 to 2009 US Census Estimate).

The projections for Sanford's future are getting worse. The Sanford median income is currently at \$38,219 and expected to drop below 80% of the State of Maine's median income. That was \$15,915 less than the York county average, \$8,322 less than the state median, and \$12,002 less than the U.S. median income. In addition, Sanford's future population is expected to contain more and more of the regions lower income households. Because of the decrease in employment opportunities and in median income, the average Sanford resident has trouble finding work or affordable housing in Sanford.

The Town's loss of manufacturing in its economic base affects not only the employment opportunities and median income of residents, but also affects the physical environment of the Town. Many of the former industrial are now abandoned, deteriorating, and affected by contaminated media (soil, groundwater, sediment, surface water, and building materials).

Reversing these trends requires a community-wide effort. This kind of wholesale change involves taking significant risks by investing in the community's uncertain future. Today, Sanford is facing these challenges and turning them into new opportunities. On April 1, 2010,

the Town of Sanford acquired the CGA, Inc. property through tax foreclosure in order to eliminate blight, properly manage the environmental contaminants, and to protect the nearby public drinking water supply well. Based on the long history of industrial use and the lack of environmental stewardship displayed by the former owners and occupants of the CGA, Inc. property, the remediation challenges associated with the redevelopment of the site are tremendous, so much so that they are currently making redevelopment unviable. The Town of Sanford respectfully requests a \$200,000 cleanup grant to help defray the costs of cleanup and help make the redevelopment of the CGA, Inc. site a reality.

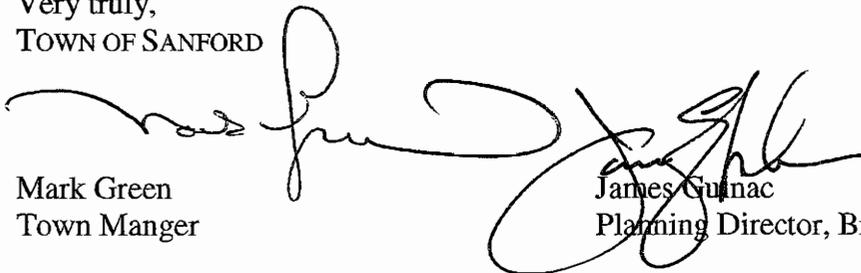
Required information follows:

- a. Applicant Identification: Town of Sanford, 919 Main Street, Sanford, Maine 04073
- b. Applicant DUNS Number: 093629723
- c. Funding Requested:
 - i. Grant Type: Cleanup
 - ii. Federal Funds Requested: \$200,000(not requesting waiver for 20% cost share)
 - iii. Contamination: Hazardous Substances
- d. Location: Town of Sanford, York County, Maine
- e. Complete Property Name and Address:CGA, Inc., 229 New Dam Road, Sanford, ME 04073
- f. Contacts:
 - i. Project Director: James Gulnac, AICP, Planning Director, Brownfields Project Coordinator, Town of Sanford, 919 Main Street, Sanford, Maine 04073; (207) 324-9150 (phone); (207) 324-9166 (fax); jggulnac@sanfordmaine.org (e-mail)
 - ii. Chief Executive: Gordon N. Paul, Town Council Chairperson; Town of Sanford, 919 Main Street, Sanford, Maine 04073; (207) 324-9173 (phone); (207) 324-9124 (fax); gpaul@sanfordmaine.org (e-mail)
- g. Date Submitted: November 28, 2011
- h. Project Period: July 2012 through June 2015
- i. Population Served: 20,798 within Town of Sanford
- j. Special Considerations: See Attachment 7 of attached Grant Application

We are a Town full of determined people committed to facing these challenges head on. We thank you in advance for considering our grant application. If you should have any questions or require clarification on any element of this proposal, please give me a call at (207) 324-9173.

Very truly,
TOWN OF SANFORD

Mark Green
Town Manger



James Gulnac
Planning Director, Brownfields Project Coordinator

cc: *with attachments*
Diane Kelley, EPA Region 1 Brownfields Coordinator
Jean Firth, State of Maine DEP

NARRATIVE PROPOSAL

1. Community Need

The Town of Sanford developed its industrial base in the late 1860s when Thomas Goodall established Goodall Mills in the center of town. Skilled textile workers were attracted to Sanford from the woolen centers of England, the French-speaking provinces of Canada, and from other foreign countries. When the mill closed in the 1950s, more than 3,500 residents lost their jobs.

At this time, the Sanford Chamber of Commerce as well as the Sanford Industrial Development Corporation responded with a campaign to maintain the industrial base within Sanford. These two organizations were very successful and attracted several large industrial companies to the area including the Wasco Chemical Company, American Cyanamid, Pioneer Plastics, Eastern Plastics Corporation, North Star Woolen, Colonial Aircraft Corporation, Alloy Products Company, Sanford Dress Company, Sanford Weaving Company, Aletta Manufacturing Company, and Sprague Electric Company. In 1965, based on the popular motto coined by the Sanford Chamber of Commerce, *Life* magazine referred to Sanford as “the Town that refused to die.” Even in 1980, 53% of Sanford’s employed population was in skilled labor. However, with the increase of globalization in the 1980s and 1990s, Sanford’s industrial base dwindled as businesses either relocated or closed. Of the above companies, **none** remain in Sanford. But their abandoned buildings remain.

1.a. Health, Welfare, and Environment

The reduction in manufacturing for its economic base over the years hurts not only the employment opportunities and median income of residents, but also affects the physical environment of the Town. Many of the large mills and industrial properties are now abandoned and deteriorating. Not only do these structures appear as eyesores, but they serve as a constant reminder of the rich industrial heritage of the past and the daunting challenges of the present. In addition, contaminated media (soil, groundwater, sediment, surface water, and building materials) have been left unaddressed at each of these abandoned properties.

1.a.i. Number, Size, and Impacts of Brownfields

Sanford’s industry shift and economic decline has created over **30 Brownfields sites** which have impacted approximately **80 acres** of land. The degradation and current state of these properties is a crushing detriment to economic opportunity and presents an unacceptable health risk to Sanford’s residents and sensitive populations. These sites include huge vacant and foreboding mill buildings and manufacturing plants like the Sanford Mill, International Woolen Mill and Stenton Trust Mill, enormous bulk petroleum facilities, and shuttered commercial operations such as dry cleaners, construction companies, auto repair facilities, and gasoline stations.

Environmental Impacts of Brownfields: The daunting collection of Brownfields sites has resulted in the contamination of Sanford’s environment. Contaminated soil, groundwater, soil vapor, and hazardous building materials have been detected at several sites that have been investigated under Sanford’s Brownfields Assessment Program. These include the Stenton Trust Mill, with chlorinated solvents and petroleum contamination as well as asbestos issues; the former Goodall Mill tank area site, with petroleum contamination; the Aerofab site with impact by metals, chlorinated solvents, and asbestos; the International Woolen site with metals, petroleum, and chlorinated solvent contamination issues; the Sanford Transportation Center site with petroleum contamination; and the CGA, Inc. Site (the subject of this cleanup grant).

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The CGA, Inc. property is a direct representation of the challenges present in Sanford and the effect that Brownfields sites have on our community. The Site was operated by a pre-cast concrete manufacturer and an electronic circuit board recycling facility. It was abandoned in 1991 and currently sits derelict and vacant, leaving behind significant metals contamination in soil and groundwater. Sanford does not have the funds to clean up this Brownfields site but must act to protect the environment and the health of our residents, and to facilitate its redevelopment.

Health Impacts of Brownfields: Many of Sanford's Brownfields sites are former industrial facilities or were accessories to these facilities, such as the nearby gasoline service stations and dry cleaners. These sites flourished during the industrial boom, but now lay dormant and deteriorated. Each site presents a significant risk to human health through exposure to vapors, which have permeated residents and businesses, or contact with contaminated surficial soils.

Many of the human health threats posed by Sanford's Brownfields sites stem from the use of dyes, solvents, hazardous building materials, and fuels during more than 100 years of industrial use. A summary of contaminants and associated health impacts is presented below:

Contaminant	Exposure Route	Health Effects
Petroleum used for heating and power	Vapor inhalation, ingestion, dermal absorption	Skin and lung irritation, headaches, dizziness, fatigue, cancer, nervous and digestive system damage.
Heavy metals from dyeing processes	Ingestion, dermal absorption	Retardation, neurological damage, various cancers, kidney damage
Chlorinated solvents, volatile compounds from equipment maintenance, industrial processes	Vapor inhalation, ingestion, dermal absorption	Dizziness, fatigue, headaches, skin problems, and damage to the nervous system, kidneys, and liver.
Lead-based paint	Inhalation, ingestion, dermal absorption	Nervous, circulatory, and reproductive system damage.
Asbestos in building materials and industrial equipment	Inhalation	Lung cancer and mesothelioma
PCBs in building materials and industrial equipment	Ingestion, dermal absorption	Cancer, damage to the immune, reproductive, nervous, and endocrine systems

In addition, more than 35 percent of the community-based water systems in Sanford and the surrounding areas have failed the applicable health-based standards, which is by far the lowest passing rate in Maine. Based on the conclusions of a Maine DEP subsurface investigation, copper concentrations detected in Sanford's New Dam Municipal Well have been attributed to the CGA Brownfields site, which demonstrates the dire need to protect the health of Sanford's population through the remediation of Brownfields sites. Also, Sanford's percentage of adults with high blood pressure exceeds both the state and national averages. These serious health indicators are exacerbated by the worst resident population to physician ratio in the state. (Cited data based on York County 2008 Maine State Profile of Selected Public Health Indicators, Maine Center for Disease Control and Prevention/Department of Health and Human Services (CDCP/DHHS))

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Welfare Impacts of Brownfields: Sanford's Brownfields sites are scarred by graffiti and broken windows; the parking lots are cracked and sprouting weeds; the perimeter fences are rusty; the woods are strewn with trash; and the soils are contaminated by decades of industrial use. Police now patrol these sites on a daily basis, dealing with squatting by homeless people, midnight trash dumping, arson, assaults, and recurring vandalism. In 2006, former Sanford Police Chief Thomas Jones said "It's a huge toll on our police resources, checking a huge complex for any number of issues; I liken [these abandoned properties] to the third sub-level of a subway...It's a dark void in the middle of town that harbors all kinds of evil." Maine CDCP/DHHS data indicates that the incidence of rape and violent crime in York County exceeds the state average.

The Brownfields sites in Sanford drag down the Town's image and cause stress to the resident population. "The perception of Sanford and Springvale as a declining mill town with a poorly skilled workforce limits our ability to attract and develop new high quality employers and to develop a stable, diversified employment base," according to the Sanford Comprehensive Plan (2002 Update). Reinforcing this view were citizen comments received during a visioning session, which were summarized as: "Negative take on Sanford as 'mill-town mentality,' and "Need to improve image of Sanford as mill town - like Lewiston used to be."

1.a.ii. Cumulative Environmental Issues and Disproportionate Effects of Brownfields

Sanford's former industrial center and dense downtown Mill Yard district have historically attracted high impact land usage such as mills, factories, and the ancillary commercial enterprises that supported them. Now, with those industries gone, there is a disproportionately dense distribution of derelict and environmentally compromised properties in Sanford. Much like the greater degree of risk posed by a site contaminated with multiple chemicals verses one, the severity of the characteristic environmental issues in Sanford is compounded by the sheer number and density of these problem properties. Cumulative health impacts include higher than average rates of high blood pressure and colorectal and breast cancer, according to the 2007 State of Maine Health reports. Sanford has also been identified as one of five "hot spots" for lead exposure. Based on the EPA Environmental Justice data, the area of Sanford falls into the most severe cancer risk category. Furthermore, a review of information presented on the EPA's Envirofacts Enviromapper application, the area of Sanford is host to a disproportionately high concentration of EPA regulated sites, including those affected by toxic and water releases.

1.a.iii. Health & Welfare of Sensitive Populations

Based on the demonstrated risk that Brownfields sites pose to the public water supply, all of Sanford's residents, including children, the elderly, women of child-bearing age, and minorities are in danger. As the metabolic uptake rate is far greater in children than in adults, this sensitive population is at even greater risk. In addition, women of child-bearing age have been disproportionately impacted. This condition is demonstrated through an above average infant mortality rate, rate of live births with low birth weight, and infants born to women receiving first trimester pre-natal care versus state-wide statistics (Cited information based on data for York County, 2008 Maine State Profile of Selected Public Health Indicators, Maine CDCP/DHHS). Sanford's Brownfields sites are concentrated in the most densely populated residential areas as these areas as they once supported the former industrial properties. Therefore, the sensitive portion of Sanford's population is most at risk due to the proximity of these contaminated sites.

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1.b. Financial Need

1.b.i. Table of Demographic Information

	Sanford	York County	Maine	National
Population:	20,798 ⁴	197,131 ⁴	1,328,361 ⁴	308,745,538 ¹
Unemployment:	8.6% ⁵	6.0% ⁵	6.6% ⁵	9.0% ²
Poverty Rate:	15.2% ⁴	8.4% ⁴	12.6% ⁴	14.3% ³
Percent Minority:	6.1% ⁴	3.6% ⁴	4.8% ⁴	26.7% ¹
Per Capita Income	\$19,534 ⁴	\$26,863 ⁴	\$24,980 ⁴	\$ 26,530 ³
Median Household Income	\$38,219 ⁴	\$54,134 ⁴	\$45,708 ⁴	\$50,221 ⁴
Persons Over Age 65	15.2% ⁴	15.4% ⁴	15.9% ⁴	13.0% ⁴
Bachelor's Degree or Higher	13.1% ⁴	27.7% ⁴	26.1% ⁴	27.5% ⁴

1. Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>
 2. Data is from the Bureau of Labor Statistics (September 2011) at www.bls.gov
 3. Data is from the 2009 American Community Survey:
http://www.census.gov/newsroom/releases/archives/income_wealth/cb10-144.html
 4. Data is from 2010 U.S. Census Data: <http://quickfacts.census.gov/qfd/states>
 5. Sept. 2011 "Sperling's Best Places to Live" www.bestplaces.net/economy/city/maine/sanford

Based on the information presented above, Sanford is characterized by a population that is struggling with high unemployment, elevated poverty, low median income, an underserved minority population, and the lack of a skilled and educated workforce.

1.b.i. Economic Impact & Need

Sanford has never fully recovered from the mill closings which claimed the jobs of over 20 percent of its population. The loss of industry and creation of Brownfields sites have contributed to the downward spiral of disinvestment in our community resulting in a population that, as highlighted by the table above, is struggling with high unemployment (the highest in southern Maine), elevated poverty, low median income, an underserved minority population, and the lack of a skilled and educated workforce. Other data highlighting the impacts of Brownfields on Sanford include:

- People do not have the incentive nor financial resources to maintain their properties resulting in Sanford having the highest housing foreclosure rate in the State of Maine.
- Sanford's property tax rate of \$17.52 per \$1,000 of valuation is significantly higher than surrounding rural towns because, as a service-center community, it supports an infrastructure and services used by the entire region.
- The Town is largely bypassed by the lucrative tourist traffic of southern Maine that tends to travel up the I-95 corridor, which is 15 miles away, and skip the Sanford exit.

1.b.i. Limiting Factors to Cleanup Resources

In recent years, Sanford has lost population and seen its tax base shrink. In the first decade of this century, the town's population fell by 3.7 percent (2010 Census). The overall tax base of \$1.4 billion has shrunk by 11 percent in four years primarily as a result of declines in the housing market and further declines in manufacturing, according to property assessing records. The Town had the highest home foreclosure rate in Maine in 2008. Just this year, downsizing at Cyro and the closure of Wasco reduced the tax base by \$1.5 million. The shrinking tax base translates into a higher tax rate to raise the same amount of revenue or a reduction in services

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In the face of these constraints, the Town has struggled to maintain core services of police, fire and public works, according to Town Administrator Mark Green. Staff at police and fire departments have been frozen for the past six years, while staff at public works has been cut by 10-15%. The town's capital budget of \$1 million a year, for equipment replacement and paving, is about half of what a town of Sanford's size should be spending, Green said. Funding new projects or taking on new responsibilities is extremely difficult.

The CGA site has sat abandoned and idle for over 20 years. Wastes and contaminated soils are strewn throughout the property. The cost of cleanup is estimated to be at least \$350,000. The Town does not currently have the funds to pay for this remediation.

1.b.ii. Need for Additional Brownfields Funds

The cleanup of the CGA, Inc. site and the protection of the nearby public water supply well will not be possible without the use of Brownfields funds. No additional funding is available to complete this work. As stated by former Maine DEP Commissioner David P. Littell in a letter to Sanford resident David Bernier, who requested assistance to remediate the CGA, Inc site, "Unfortunately, in some circumstances there is no funding source readily available for the State to undertake the clean-up and we must focus our efforts on the most hazardous sites. I know this is not the answer you were hoping for, but unfortunately, given the long list of abandoned contaminated sites in Maine, there quite simply isn't enough money to go around." Sanford's previously awarded 2008 and 2010 Brownfields Assessment Grants have been fully expended. In addition, Sanford will have expended three other cleanup grants, which were awarded in 2009 and 2010, by the end of this year. Brownfields funding has allowed Sanford to assess and cleanup contaminated properties and is leveraging over \$30 million in public funding and private investment. However, there is much more work to be done and the cleanup of additional properties is crucial to maintaining the current momentum and improving the livability of Sanford.

2. Project Description and Feasibility of Success

2.a. Project Description

2.a.i. Existing Property Conditions

Sanford is the kind of compact, liveable community that can become increasingly attractive in the 21st century. Most houses and businesses are clustered along a central artery that includes Main Street and the Mousam River, a largely undeveloped greenbelt that parallels Main Street. Schools are centrally located and within bicycling and walking distance of most residents, and in-town neighborhoods are served by sidewalks.

Political leaders in Sanford have embraced these qualities to leverage economic development opportunities. In 2003, the Town hired its first economic development director and reformed the structure of Town government to make it more nimble and responsive. The goals that the Town Council sets for itself reflect an emphasis on smart growth, livability, and downtown revitalization.

Since 2005, the Town has been executing consultants Bartram & Cochran's economic development strategy, which calls for strengthening the connections between the Mill Yard, downtown and Mousam River waterfront. In keeping with that vision, the Town has: built a \$2.5 million road/bike path through the Mill Yard; started a National Main Street program; developed a downtown streetscape plan; begun tree planting; started reconstruction of a strategic pedestrian passageway that is integral to the downtown Master Plan; secured a \$675,000 Riverfront Bond to make waterfront

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improvements, and attracted two developers to the Mill Yard: Northland Enterprises (\$10.5 million investment) and Brady Sullivan (\$20 million investment). This track record shows that the Town has a sustained commitment to not just cleaning up Brownfields sites but to ensuring their redevelopment.

The CGA, Inc. site was acquired by the Town in April of 2010 through an involuntary acquisition for failure to pay property taxes. The 17 acre property was originally operated as a pre-cast concrete manufacturer prior to the 1970s and as a circuit board manufacturing facility from late 1970s to 1991. The site has been vacant since 1991 and currently contains the shell of a 50 foot by 125 foot cement block building. Large waste piles, estimated to total greater than 3,000 tons, of circuit board shear trim, tires, wood, metal, rubber, plastic, cloths, cans, cardboard, and concrete were left behind by the circuit board recycling facility and are currently unsecured at the vacant site. Furthermore, hazardous building materials including lead-based paint and asbestos, as well as universal and hazardous wastes have been documented in association with the site building.

Several previous investigations and cleanup have been completed including a removal of hazardous wastes from the facility by the Maine DEP in 1991, a site Assessment completed by the Maine DEP in 2000, a Phase I Environmental Site Assessment (ESA) and a Phase II Investigation completed through the Sanford Brownfields Assessment Program in 2007 and 2011, and an underground storage tank (UST) Closure Assessment completed in 2011.

The Site has been contaminated by historical industrial usage and is experiencing continued impact by the unsecured waste piles, which represents an ongoing source of contamination. A subsurface investigation conducted by the Maine DEP and a Phase II ESA conducted under the Town of Sanford's Brownfields Assessment Program have identified concentrations of copper, zinc, arsenic, lead, thallium, and gasoline-range petroleum hydrocarbons that are in excess of the applicable action levels in various environmental samples collected from the Site. Impacted media has been documented to include surficial soil, subsurface soil, surface water, sediment, and groundwater. On-site contaminated media was identified primarily within the 3-acre developed area of the 17-acre Site. In addition, the Site is located over a mapped significant sand and gravel aquifer and is within 1,000 feet of a public drinking water supply source, the New Dam Municipal Well. Based on the conclusions of the Maine DEP subsurface investigation, copper concentrations detected in the New Dam Municipal Well have been attributed to the Site. This property must be remediated to protect the human and environmental receptors in the area and allow for the successful redevelopment of a derelict and dangerous site. The required remediation cannot occur without Brownfields funds.

Following remediation, the Site will be redeveloped. Resolution Environmental is investigating the development of a scrap material sorting and recycling facility at the Site. If markets, neighborhood concerns, and permitting requirements are favorable, the facility would represent a \$500,000 investment and up to 10 jobs initially created with more expected (See **Attachment 4**). If this redevelopment option is determined to not represent the highest and best use, the Site is proposed to be redeveloped as a mixed-use public facility that would include a ball field with walking trails that will connect to the adjacent conservation land and a substation to serve the police and fire services.

2.a.ii. Proposed Cleanup Plan

Remediation of the CGA, Inc. site will consist of the proper removal/disposal of the waste circuit boards and other special waste (as defined by the Maine DEP), the covering of contaminated soil,

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and the removal/disposal of hazardous and contaminated building materials.

Specifically, a qualified environmental services provider will be retained to excavate, segregate, characterize, contain, and properly dispose the various Maine DEP special waste materials that have been dumped at the Site. The removal of this material will eliminate any potential continuing source of contamination and allow for the remediation of contaminated soil located below and in the vicinity of the waste piles. A qualified environmental services provider will then inventory, consolidate, and remove universal and hazardous waste materials from within the building for proper off-site disposal. Furthermore, any contaminated building materials that remain at the Site, such as lead-based paint covered components, will be properly removed for off-site disposal. Each remediation task item will utilize standard construction techniques and can be implemented in a relatively short timeframe. Finally, consistent with the results of additional assessment activities, contaminated soil remaining at the Site will be covered with an engineered barrier to properly manage potential risk.

During construction, engineering controls will be utilized including dust suppression during excavation activities and the use of temporary fencing to protect the public during construction activities. Once remediation is completed, institutional controls will be placed through the use of Maine’s Uniform Environmental Covenant Act. A deed restriction will be implemented to prohibit the disturbance of the soil cover, the excavation of contaminated soil, and the extraction of groundwater from the Site. These restrictions will be documented through the Maine DEP Voluntary Response Action Program (VRAP).

2.b. Budget, Measuring Progress, and Leveraging Other Resources

2.b.i. Budget Table and Task Descriptions

A proposed budget for this Brownfields Hazardous Substances Cleanup Grant is presented below. **Please note** that the total budget, as determined through the review of completed assessment work and the results of the Draft Analysis of Brownfields Cleanup Alternatives (**Attachment 6**) is approximately \$399,400. All of the project tasks are eligible for Brownfields funding. Therefore, the portions of the project budget which exceed the value of the Brownfields Cleanup Grant will be funded through leveraged resources as described further in Section 2.b.iii.

CGA, Inc. Brownfields Hazardous Substance Cleanup Budget					
<i>Budget Categories</i>	<i>1. Cooperative Agreement Oversight & Engineering</i>	<i>2. Public Meetings and Community Involvement</i>	<i>3. Cleanup Activities</i>	<i>4. Coordination and Reporting</i>	<i>Total</i>
Personnel	\$0	\$2,000	\$0	\$0	\$2,000
Travel	\$0	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$1,000	\$0	\$0	\$1,000
Contractual	\$30,000	\$10,000	\$150,000	\$6,000	\$196,000
Other: VRAP Fees	\$0	\$1,000	\$0	\$0	\$1,000
Total	\$30,000	\$14,000	\$150,000	\$6,000	\$200,000
Cost Share	\$7,000	\$3,500	\$26,000	\$3,500	\$40,000

This project consists of the following tasks to be covered in part by the Brownfields Grant:

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Task I: Cooperative Agreement Oversight / Engineering: Includes costs for the planning, engineering, design, bidding, and oversight of cleanup activities. This budget allocates all costs to contractual items to complete the cleanup activities of the Site and is further broken down as follows:

1. \$10,000 for planning, engineering, design, and bidding (100 hours at \$100 per hour)
2. \$5,000 for waste characterization and disposal facility coordination (6 disposal criteria samples at \$600 plus 14 hours at \$100 per hour)
3. \$15,000 for on-site oversight and documentation (150 hours at \$100 per hour)

It is estimated that the Town will provide grant management oversight and contractor coordination as an in-kind service at an estimated amount of \$7,000 (100 hours at \$70 per hour). Outputs for this include EPA Quarterly reports, quarterly ACRES updates, engineering bidding documents, and cleanup oversight field reports.

Task II: Public Meetings and Community Involvement: Includes development of a Community Relations Plan and preparing and advertising an Analysis of Brownfields Cleanup Alternatives / Remedial Action Plan (ABCA/RAP), and submitting a VRAP application and work plan. In addition, this task involves the public involvement activities described in Section 3.a. This task estimates the following:

1. \$2,000 for Town personnel to advertise and attend public meetings (28.5 hours at \$70 per hour)
2. \$10,000 for consultant time to prepare the ABCA/RAP and VRAP documents, assist in the community outreach portion, and participate at the public meetings (100 hours at \$100/hour)
3. \$1,000 for participation in the Maine DEP VRAP program (\$500 application fee plus 10 hours of DEP technical review at \$50 per hour)
4. \$1,000 in supplies that will comprise newspaper advertising and presentation materials

The Town will provide additional coordination and community outreach support outside of the public meetings as an in-kind service at an estimated amount of \$3,500 (50 hours at \$70 per hour). Outputs for this task include the Community Relations Plan, ABCA/RAP, VRAP No Action Assurance Letter, handouts during public meetings, and meeting minutes.

Task III: Cleanup Activities: This task includes contractor costs for the removal, transport, and proper disposal of Maine DEP special waste materials and other impacted media from the Site and the capping of contaminated soil.

This budget allocates all costs to contractual items to complete remediation activities at the Site and is further broken down as follows:

1. Approximately \$120,000 for fencing and the removal/disposal of approximately 3,000 tons of Maine DEP special waste materials (estimated disposal at \$40 per ton for mobilization, excavation, transportation, and disposal, which also includes the cost of fencing).
2. Approximately \$12,500 for the abatement of hazardous building materials and universal waste from the Site building (based on a cost of \$2.00 per square foot over 6,250 square feet).
3. Approximately \$17,500 for the installation of the engineered soil cap (estimated at 65,000 square feet at \$0.27 per square foot).

The Town of Sanford will provide a cost share of \$26,000, which will be sourced through a cash

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contribution from the Sanford capital fund. Outputs for this task will include engineering oversight field reports that will be submitted to the Maine DEP for approval, and bills of lading and/or waste manifests.

Task IV: Coordination and Final Reporting: Includes consultant costs for ongoing coordination with the EPA Brownfields Program and the Maine DEP Voluntary Response Action Program. Subtasks will include communications, submission of status reports, and a remediation summary report.

This task estimates \$6,000 for consultant time for preparing the remediation summary report (60 hours at \$100 per hour).

The Town will provide coordination and communications with the EPA and DEP as an in-kind service at an estimated amount of \$3,500 (50 hours at \$70 per hour). Outputs include the remediation summary report as well as a Certificate of Completion from the Maine DEP VRAP.

2.b.ii. Plan for Tracking and Leveraging Progress

Our plan for tracking and measuring progress towards achieving the expected project outcomes is fairly straight forward and easy using the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES) database. The ACRES database is used to track the expected project outcomes presented in Sections 4a and 4b including jobs created, other funds leveraged, private investment dollars leveraged, and acres of greenspace created. Sanford is currently implementing a long-term Brownfields program within the community. Therefore the ACRES database is being updated on a quarterly basis for all sites assessed and cleaned up under our program in conjunction with the submittal of the EPA quarterly report and will continue once cleanup and redevelopment activities are completed.

Success of the funding received to date as well as potential new funding is, and will continue to be, tracked and measured by the Town of Sanford in terms of number of properties assessed, acres of land cleaned up, and number of Phase I and Phase II reports filed (environmental benefits). The Town is also tracking assessed property values and the number of new jobs associated with these projects (economic benefits). We have and will also measure the interest of the community in the Brownfields program by tallying “hits” on the Town’s website (social benefits). Our Brownfields website link has an email address to allow users to convey a comment, concern, or compliment.

The Maine DEP will also be utilized to track progress towards receiving a Certificate of Completion from the Maine DEP VRAP Program upon successful remediation of the Site, as well as tracking institutional controls after remediation is completed. The Partners for a Healthy Community will be used to track health benefits from Brownfields redevelopment including lead poisoning in children, asthma, and cancer rates.

The pinnacle output from the remediation of the CGA, Inc. Site will be the removal of contaminated media and the protection of human and environmental receptors, including the public water supply. Our ultimate measure of success for the CGA, Inc. Site will be the number of jobs associated with the project, the amount of funding leveraged, and the acres of greenspace created.

2.b.iii. Leveraging

As documented in **Attachment 4**, this project has already leveraged \$44,000 in Brownfields

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

assessment funding. However, it is expected that the value of our proposed EPA Brownfields grant, as well as in-kind time will prove insufficient to complete the required cleanup activities at the CGA, Inc. Site. Therefore, we will request a \$199,400 Brownfields Revolving Loan Fund (RLF) subgrant to help close this funding gap. The subgrant request will be fulfilled by either the Southern Maine Regional Planning Commission (SMRPC) Brownfields RLF, the Maine DEP / Department of Economic and Community Development (DECD) RLF, or by a partnership of the two RLFs. Sanford has successfully applied for and utilized SMRPC RLF subgrants to complete remediation activities at the former Aerofab and Sanford Mill sites (See **Attachment 4**). The RLF subgrants utilized at these two project sites have leveraged \$3.78 million and are expected to generate an additional \$5.4 million in private investment and additional public funding. The Town of Sanford is capable of obtaining, and experienced in properly managing, these funds. Therefore, it is very likely that these leveraged resources can be secured for this project. Other potential funding includes:

Pine Tree Zone: Maine's Pine Tree Zone Program is a package of tax incentives targeted to businesses choosing to locate or expand in distressed areas of the state (including Sanford). In York County, Pine Tree Zone incentives granted to 21 manufacturers in five communities have leveraged over 600 new jobs and \$32 million in private investment.

In addition, Sanford has been working cooperatively with Resolution Environmental in the cleanup of non-Brownfields materials at the Site, such as concrete, computer fluff, cloth bales, wood pallets, old tanks, steel, and paper. The value to the Town of Resolution Environmental's services is estimated at \$200,000. Resolution Environmental is also investigating the development of a scrap material sorting and recycling facility at the Site. If markets, neighborhood concerns, and permitting requirements are favorable, the facility would represent a \$500,000 investment and up to 10 jobs initially created with more expected (See **Attachment 4**).

2.c. Programmatic Capability and Past Performance

2.c.i. Programmatic Capability

Sanford has an outstanding amount of experience in the administration of Brownfields projects and has developed a management system with demonstrated success. To complement the overall positive outlook towards Brownfields redevelopment maintained by Sanford's residents, a consistent and unified team has been assembled to ensure these projects flourish.

The Town's overall Brownfields Program is under the direction of James Q. Gulnac, AICP, Planning Director. Mr. Gulnac has over thirty years of experience in community planning, including over 18 years working on Brownfields projects. In addition, Mr. Gulnac has successfully managed Sanford's 2004, 2008, and 2009 Brownfields Assessment Grants, the 2009 and 2010 Brownfields Cleanup grants for Sanford Mill site and Aerofab sites and the 2011 Brownfields Area Wide Planning grant. He will continue these management responsibilities under this award. In addition, the Town has a staff and consultants with experience in the management of funding and environmental remediation projects. Mr. Gulnac is supported by the Town Manager, Mark Green, as well as James Nimon, the Executive Director of the Sanford Regional Economic Growth Council. These team members have the ability to action change in local government when needed and to reach out to developers who can turn a Brownfields site into a redevelopment success story.

The Town has received and managed \$5.6 million in CDBG money (provided by the federal government and distributed by the states) in the past 25 years and the Town is among the top 10

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

recipients in the state. These funds enabled housing rehabilitation, sewer and sidewalk reconstruction, and downtown revitalization.

These team members have demonstrated their commitment to a Sanford that will someday experience growth and economic success. As evidenced by their lengthy tenures, Sanford has the ability to retain this talent. In addition, as the office of Economic Development is growing through the addition of talented and experienced staff members, there is no doubt that additional or replacement qualified personnel could be obtained for the Brownfields team.

The Town believes in a competitive procurement process and generally issues a Request for Proposals (RFP) to solicit consultant responses. The RFPs are reviewed by the Town and interviews of the top submittals/firms are conducted. The selection of a consultant provides the Town with the technical expertise and resources to complete the projects and hopefully secure additional funding and developers.

2.c.ii. Adverse Audits

The Town has had no adverse audit findings.

2.c.iii. Past Performance: Has Received EPA Brownfields Grant(s)

The five most recent grant awards received by the Town of Sanford include two \$200,000 Brownfields Hazardous Substance Assessment grants, one in 2008 and another in 2009 and three EPA Brownfields Hazardous Substance Cleanup grants, one for the Sanford Mill site and two for the Aerofab parcels. To date, we have successfully completed the required reporting obligations as well as managed our consultants within the scope of the project and the grant requirements.

Funding Expenditures: The Town has expended a total of \$1.2 million of the awarded Brownfields funds (no remaining funds) for the following:

- Completed and maintained an updated Brownfields inventory
- Completed 14 Phase I ESAs
- Prepared five site-specific Quality Assurance Project Plans and Phase II ESAs
- Completed the remediation of three contaminated and derelict former mill buildings in the historic Mill Yard and fostered their redevelopment,
- Conducted Brownfields outreach activities through public meetings and preparation of brochures and handouts and solicited input from residents, Maine DEP, EPA, and interested stakeholders
- Attended four National Brownfields Conferences
- Conducted developer and mill owner meetings and outreach

Compliance with Grant Requirements: Since the award of our Brownfields grants, the Town has submitted the required quarterly reports. We have provided a breakdown of tasks completed and reported financial information. We have worked closely with four different EPA regional representatives, taking each on a tour of the community and introducing them to the potential Brownfields sites. In addition, Sanford has held numerous Brownfields Committee meetings where we have informed state and federal representatives of activities. The Town has also conducted DBE/MBE/WBE reporting and has input all data input into the ACRES database.

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

Accomplishments: Sanford has created two EPA Region 1 Brownfields Success Stories through previous grant awards. These sites are described below and documented in **Attachment 4**.

The Sanford Mill was initially assessed through the Town of Sanford's EPA Brownfields Assessment Grant. In addition, an ABCA/RAP was produced using the Town of Sanford's EPA Brownfields Cleanup Grant. Finally, Sanford developed a Quality Assurance Project Plan for use during the performance of remediation activities. Between 2009 and 2010, cleanup activities, including the removal and proper disposal of asbestos-containing materials and universal and hazardous wastes, and the excavation and disposal of polychlorinated biphenyl (PCB), metals, and petroleum-impacted soil, were completed at this property. Town of Sanford currently has a development agreement with a local developer. This \$10 million project includes the redevelopment of the site into 25,000 square feet of commercial office space and 36 residential units and will create 75 full-time jobs. This will be the first successful redevelopment of the mills in the Mill Yard. The Town has also experienced developer interest in several of the other properties assessed under this program. Once the Sanford Mill redevelopment is complete, we expect this to serve as a catalyst for future redevelopment of other mills in the Mill Yard.

In addition, the Town of Sanford recently completed the Brownfields-funded assessment and the initial phase of the redevelopment of the Aerofab Mill. Following assessment, remediation plans were developed using the Town of Sanford's EPA Brownfields Cleanup Grant. Beginning in 2009, cleanup activities, including the removal and proper disposal of asbestos and universal and hazardous wastes, and the abatement of hazardous industrial equipment, were completed at this site. The Town then developed specifications and project plans, and razed the Aerofab building in order to redevelop the site as a parking facility to support the adjacent Sanford Mill Brownfields project. The Town is currently producing design plans and specifications to construct the parking lot. This design will incorporate the installation of engineered controls to minimize environmental risk and maximize the use of eligible funding.

3. Community Engagement and Partnerships

3.a. Community Engagement Plan

Upon award of this grant, the Town will develop a Community Relations Plan that will outline the community involvement components of the project. This plan will follow similar approach that has been successful on our other Brownfields Projects. This includes regular briefings of the Town Council, direct outreach to affected neighborhoods, and web and media outreach in the local area.

Regular briefings are currently held at Town Council meetings to: (1) update the public on status of the Site (including addressing the environmental issues at the Site), (2) solicit public opinion as to reuse scenarios, and (3) provide a public forum for the community to voice any opinions, and concerns or questions regarding the Site. These briefings will continue throughout the redevelopment of the property. Public briefings will be held to specifically address pre-cleanup planning and discuss post cleanup results for the project. The briefings will also be used to solicit public input on current environmental activities and cleanup decisions. The Town will also make all draft documents available for public review.

The Town will also communicate the progress of the project through neighborhood outreach, contact with adjacent landowners, mailings to landowners, and telephone calls and e-mails to community based organizations and key landowners. As development plans progress, they will be

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

invited to public meetings. The Sanford News, a local newspaper, publishes articles summarizing each Town Council and public meeting. In addition, the Town of Sanford web site (www.sanfordmaine.org) provides regular updates on the status of the redevelopment and will direct the public to draft documents for review and comment.

Over 99% of Sanford speaks English. However, translation services will be provided upon request.

3.b. Local, State, and Tribal Partnerships

The Maine DEP, the Maine Department of Health and Human Services (DHHS), and our community based organizations in the target communities will serve as critical partners throughout the Brownfields program. Each one provides a critical role in the successful implementation of the Brownfields Redevelopment Program. The Maine DEP will be our partner throughout the cleanup process through participation in the Maine DEP VRAP program. Through this program, an approved remedial plan that is subsequently implemented to the satisfaction of the Maine DEP will result in the delivery of a Certificate of Completion and liability release.

The Town of Sanford has also been working closely with the Maine DHHS to evaluate the health impacts in the industrial areas of Sanford. Much of the information cited in previous sections was provided by the Maine DHHS. Currently, the Maine DHHS is collecting data on blood lead levels of children who live in the target area. The details of the recent assessments are still pending but will be incorporated into future reports. Maine DHHS collects data on asthma, cancer, as well as information on other environmental health risks in the community, particularly those which impact sensitive populations. As a state agency, Maine DHHS can easily compare data collected in Sanford to other communities across the State.

The Town has also forged partnerships with other agencies in the redevelopment of our Brownfields sites. The Federal Transit Administration has funded construction of a \$1.2 million transportation center, to be located in or near the Brownfields-impacted Mill Yard area. Sanford Regional Technical Center has used the Mill Yard as a real-life job training site for students in a variety of programs, such as computer assisted drafting and design, building trades, digital design, and media communications. Their projects include design and fabrication of an historically-accurate prototype of the concrete railings to be replaced and a scale-model of the Mill Yard, both of which have helped stimulate public awareness and discussion of Brownfields redevelopment.

3.c. Community-Based Organizations

Through the existing Brownfields Assessment Program the Town has developed partnerships with a variety of community-based organizations to spur the revitalization of the target area and promote public involvement. A tabulated list of these organizations is included below and letters of support are included in **Attachment 3**

Organization	Contact	Details
Bernier Enterprises	David Bernier President 207.651.0221	Bernier is a former staffer in the US Surgeon General's office, who serves as spokesman for the neighborhood. He has provided effective advocacy and outreach through Twitter (@CleanCGA) and has made use of his valuable professional and political connections.

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

Organization	Contact	Details
Sanford Regional Economic Growth Council	James Nimon Executive Director 207.324.9155	This council markets the Mill Yard to prospective developers, holds outreach events, and publicizes Brownfields Developments through its website www.sanfordgrowth.com
Estes Lake Association	Tom Fiore President 508.284.0174	Estes Lake Association represents residents of Estes Lake within a half mile of the CGA site. The association plans to continue monitoring, advocacy, and informing its members.

4. Project Benefits

4.a. Welfare and/or Public Health

Cleaning up and redeveloping a Brownfields site such as the Sanford Transportation Center can remove blight and environmental contamination, catalyze neighborhood revitalization, lessen development pressure at the urban edge, and use existing infrastructure. The remediation and redevelopment of the CGA, Inc. Site will generate the following environmental, social, and public health benefits:

Environmental Benefits: The redevelopment of the CGA, Inc. Site will result in the collection and proper disposal of approximately 3,000 tons of Maine DEP special waste that is a potential continuing source of copper, zinc, and thallium contamination at the Site. This will remove the source area, improve soil and groundwater quality, and protect downgradient environmental receptors, such as adjacent surface water and sediment.

In addition, the open space preservation and creation that will result from this project can help protect water quality by reducing the amount of paved surfaces and by allowing natural lands to filter rainwater and runoff before it reaches drinking-water supplies. Runoff from contaminated sites such as the CGA, Inc. Site often contains toxic chemicals and other associated contaminants, which is the second most common source of water pollution for estuaries, the third most common for lakes, and the fourth most common for rivers.

As described in Section 2.a.ii, short term measures, such as fencing, dust control, and signage, will be implemented during remediation and redevelopment to ensure the protection of the general community and sensitive populations, such as children who play in the area of the Site and pregnant women who live in the nearby residential neighborhoods. In addition, the public participation program discussed in Section 3 will provide notice of work activities as well as contact information for questions or concerns.

Social Benefits: The cleanup of CGA, Inc. Site will integrate equitable development principals to remove blighted conditions and spur the redevelopment of the Site. It will protect public safety by removing huge amounts of unsecured Maine DEP special waste. In addition, redevelopment plans include the development of a sorting and recycling facility, which would represent a \$500,000 expansion of the tax base and 10 initial permanent jobs, which are badly needed in an economically challenged and underserved residential area. An alternate possibility is the development of a mixed use public-private development that could include trails and greenspace and other public service facilities, which would improve public perception and the quality of life of residents living in the target area.

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

Health Benefits: The remediation of the CGA, Inc. Site will result in significant health benefits to the members of the target community, the ultimate long-term goal of this program. The removal of Maine DEP special waste materials and remediation of hazardous building materials will result in reduced risk of lead poisoning and asthma for children, as well as healthier living conditions for pregnant women, the elderly, and the general population in the target area. Most importantly, the removal of this waste material will eliminate a potential source of contamination which has been linked to elevated copper concentrations in the nearby New Dam Municipal Well. The proposed remedial activities are an important component of the protection of the public water supply and will directly benefit the health of the entire target community.

4.b. Economic Benefits and/or Greenspace

The successful award of this cleanup grant will leverage a significant amount of public cleanup and redevelopment dollars. Based on Sanford’s policies of local contractor usage and job creation these awards will have a direct impact on the Town’s economy.

Brownfields Cleanup Grant:	\$200,000	Potential Private Investment	\$500,000
RLF Subgrant:	\$198,000	Permanent Jobs Created	10

This project will increase property values through the removal of blight, provide 10 jobs, and will have a catalyzing effect that will spur support for additional redevelopment projects in the target area. This project could also add 17 acres of greenspace by turning a derelict and vacant property into public green space. This project will truly exemplify a Brownfields success story by transforming a contaminated and blighted property into one which no longer threatens, but enriches, the lives of the target community.

4.c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

This is a “Smart Growth” project and will have several environmental benefits beyond the remediation of contaminants. It incorporates the following sustainable redevelopment practices:

Project Action	Smart Growth Outcome
Create a link between the surrounding residential community and walking trails that will connect to the adjacent Town-owned conservation land.	Create walkable neighborhoods
Remove blighted conditions and replace this source of frustration with a quality of life improving transportation facility.	Promote community character and livability
Evaluate RFPs for the use of local contractors and resources	Foster the use of local materials and resources
Preserve greenspace by focusing development on existing developed land.	Preserve open space, farmland, natural beauty, and critical environmental areas
Creates greenspace and removes a source of potential impact to adjacent surface water and wetlands.	Ecological revitalization
Demand high recycling rates during cleanup. For example, the completed Aerofab project achieved a recycling or re-use rate of 95%.	Promote green cleanups
Follow the Community Engagement Plan and work with community based organizations during cleanup and redevelopment.	Encourage community and stakeholder collaboration in development decisions

ATTACHMENT 1
THRESHOLD DOCUMENTATION

CGA Site Brownfields Cleanup Grant Application, Sanford, Maine

ATTACHMENT 1: THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

- 1.a. Eligible Entity: The Town of Sanford is a general purpose unit of local government.
- 1.b. Site Ownership: The Town of Sanford acquired the property through tax foreclosure proceedings on April 1, 2010. The town of Sanford is the sole owner of the property as demonstrated through fee simple title.

2. Letter from the State or Tribal Environmental Authority

See letter from the Maine Department of Environmental Protection (Maine DEP) in **Attachment 2**.

3. Site Eligibility and Property Ownership Eligibility

3.a. Basic Site Information:

Name of Site: CGA, Incorporated Property

- a. Address of Site: 229 New Dam Road, Sanford, Maine
- b. Current Owner of Site: Town of Sanford
- c. Date of Acquisition: April 1, 2010
- d.

3.b. Status and History of Contamination at the Site

- a. Nature of Contamination: The Site is contaminated by hazardous substances commingled with petroleum. Site contamination attributable to petroleum is expected to be less than 10 percent of the total.
- b. Operational History and Current Uses: The approximately 17-acre Site was developed in the early 1970s and operated as a pre-cast concrete manufacturer for approximately 5 years. The Site was then used as an electronic circuit board recycling facility from the mid 1970's through 1987, and this use continued intermittently until 1991. The Site was essentially abandoned after 1991. One unsecured 50-foot by 125-foot cement block building is located at the Site.
- c. The Site is currently vacant.

- d. Environmental Concerns: Large waste piles of circuit board shear trim, tires, wood, metal, rubber, plastic, cloths, cans, cardboard, and concrete were left behind by the circuit board recycling facility and are currently unsecured at the vacant Site. Furthermore, hazardous building materials including lead-based paint and asbestos, as well as universal and/or hazardous wastes have been documented in association with the Site building.

Cause and Nature and Extent of Contamination: The Site has been contaminated by historical industrial usage and may be experiencing continued impact by the unsecured waste piles, which may represent an ongoing source of contamination. A subsurface investigation conducted by the Maine DEP and a Phase II Environmental Site Assessment conducted under the Town of Sanford's Brownfields Assessment Program have identified concentrations of copper, zinc, arsenic, lead, thallium, and gasoline-range petroleum hydrocarbons that are in excess of the applicable action levels in various environmental samples collected from the Site. Impacted media has been documented to include surficial soil, subsurface soil, surface water, sediment, and groundwater. On-site contaminated media

CGA Site Brownfields Cleanup Grant Application, Sanford, Maine

was identified primarily within the 3-acre developed area of the Site. In addition, the Site is located over a mapped significant sand and gravel aquifer and is within 1,000 feet of a public drinking water supply source, the New Dam Municipal Well. Based on the conclusions of the Maine DEP subsurface investigation, copper concentrations detected in the New Dam Municipal Well have been attributed to the Site, which indicates a much larger potential off-Site area of contamination.

3.c. Sites Ineligible for Funding

The Site is not listed or proposed to be listed on the National Priority List

a. The Site is not currently subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA

b. The Site is not subject to jurisdiction, custody, or control of the United States Government.

c. 3.d. Sites Requiring a Property-Specific Determination

a. The Site does not require a property-specific determination. This Site is not: (a) involved in a planned or ongoing CERCLA removal action; (b) subject to orders or permits issued under RCRA, FWPCA, TSCA, or SDWA; (c) undergoing active or planned corrective actions required under RCRA; (d) subject to the closure requirements under RCRA; (e) under current or potential future remediation orders to address a release of PCBs or (f) receiving or anticipated to receive monies for cleanup from a LUST trust fund.

3.e. Environmental Assessments Required for Cleanup Proposals

Type of Assessment	Report Title	Preparer	Date
Site Investigation	Site Assessment Report, CGA, Inc. Site	Maine DEP	March 14, 2000
ASTM E1527-05 Phase I ESA	Phase I Environmental Site Assessment	Weston & Sampson Engineers	January 2007
ASTM E1903-97(2002) Phase II ESA	Phase II Environmental Site Assessment	Weston & Sampson Engineers	February 2008

a. 3.f. CERCLA § 107 Liability

a. The Town of Sanford is not potentially liable for contamination at the Site. The Town of Sanford was not an owner or operator at the time of the disposal of waste materials associated with the contamination, did not arrange for the treatment or disposal of waste materials at the Site, and was not the party that accepted hazardous substances for transport to and disposal or treatment at the Site. The Site was acquired through an involuntary acquisition (tax foreclosure); therefore they are excluded from CERCLA Section 107 liability in accordance with CERCLA § 101(20)(D).

3.g. Enforcement or Other Actions

No ongoing or anticipated environmental enforcement actions have been issued for the Site. An application under the Maine DEP Voluntary Response Action Program will be submitted by the Town of Sanford to the Maine DEP in accordance with the State of Maine Environmental Regulations 38 MRSA Section 343-E. A "No Action Assurance letter" will be obtained from the Maine DEP for the Site prior to implementing remedial activities.

CGA Site Brownfields Cleanup Grant Application, Sanford, Maine

3.h. Information on Liability and Defense/Protections

Information on the Property Acquisition: The Town acquired the property from CGA, Incorporated through tax foreclosure on April 1, 2010 and currently has fee simple title. The Town of Sanford has no current or prior affiliations with the previous owners of the Site.

- a. Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances occurred prior to obtaining ownership of the Site. The Town of Sanford has not caused or contributed to any release at the Site. At no time has the Town of Sanford arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.
- b.

- c. Pre-Purchase Inquiry: An ASTM Phase I Environmental Assessment which was completed by Weston & Sampson Engineers dated January 2007 for the Town of Sanford under their Brownfields Assessment Program. In addition, an ASTM Phase II Environmental Assessment was completed by Weston & Sampson Engineers dated February 2008 for the Town of Sanford under their Brownfields Assessment Program. Weston & Sampson personnel who completed the assessments meet the qualifications of "environmental professional" as defined in the EPA rule for "All Appropriate Inquiry." No update to the January 2007 Phase I Environmental Site Assessment was completed prior to the transfer of ownership of the Site to the Town of Sanford. However, the Site was acquired through an involuntary acquisition (tax foreclosure); therefore they are excluded from CERCLA Section 107 liability in accordance with CERCLA § 101(20)(D).

- d. Post-Acquisition Uses: The Site is currently vacant and is not in use. There are no applicable current or prior users during the time of ownership of the Site by the Town of Sanford.
- e. Continuing Obligations: The Town is not aware of any continuing sudden releases at the Site. However, the Site may be experiencing continued impact by the unsecured waste piles, which may represent an ongoing source of contamination. The Town of Sanford has taken great care in the assessment of Site conditions and has determined that the removal of these waste piles is integral to the proper remediation of the Site and the verification of post-cleanup environmental conditions.

The redevelopment of the Site is critical to the revitalization of Sanford and to the protection of nearby drinking water resources and environmental conditions in the surrounding neighborhoods. Addressing environmental issues at the Site is the key component to facilitate its redevelopment. Therefore, the Town of Sanford is committed to maintaining land use restrictions and institutional controls; will coordinate and oversee the cleanup; will comply with all administrative requests and subpoenas; and will provide all legally required notices.

- 3.i. Petroleum Sites: The Town of Sanford is not requesting funding for the cleanup of petroleum contamination at this time.

4. Cleanup Authority and Oversight Structure

- 4.a. Cleanup Oversight: The Site will be entered into the Maine DEP Voluntary Response Action Program. Under the Voluntary Response Action Program, the Maine DEP will provide technical review and comment on all plans, reports, and activities pertaining to cleanup of the Site.

CGA Site Brownfields Cleanup Grant Application, Sanford, Maine

The Town of Sanford will also hire an environmental consultant prior to implementing remediation activities at the Site. The consultant will obtain and evaluate remediation contractor bids, coordinate and oversee remediation activities, and document the remedial actions pertinent to the Maine DEP Voluntary Response Action Program. Sanford's procurement procedures will be consistent with 40 CFR 31.36.

- 4.b. **Adjacent Property Access:** Current investigations indicate that off-Site migration may be occurring. However, the Town of Sanford currently owns land located adjacent to the Site. Therefore access to the adjacent property will not be an issue and remediation of both Sites will occur simultaneously if necessary. Additionally, erosion and silt control measures will be taken during removal activities to prevent contaminated media from impacting adjacent properties and receptors.

5. Cost Share

- 5.a. **Source of Cost Share Funds:** To meet the 20% cost share, the Town of Sanford will use direct financial contributions from the Town and/or a developer.
- 5.b. **Cost Share Waiver:** A hardship waiver is not being requested.

6. Community Notification

The Town of Sanford hosted a public meeting at the Sanford Town Council meeting held on November 15, 2011 at 7:00 PM. Besides the selectman, approximately 22 additional people from the public attended. We did not receive any formal comments from the public. However, general comments from the public were very positive and supportive of the grant application. The required documentation including a copy of the draft Analysis of Brownfields Cleanup Alternative, a copy of the meeting advertisement, a summary of comments received, responses to public comments, the meeting notes and sign-in sheet for the public meeting are included in **Attachment 6**.

ATTACHMENT 2

LETTER FROM STATE OR TRIBAL AUTHORITY



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

November 10, 2011

Ms. Diane Kelley
EPA Region 1
5 Post Office Square
Suite 100, Mailcode OSRR7-2
Boston, Massachusetts 02109-3912



Dear Ms. Kelley:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the Town of Sanford plans to conduct site assessments and cleanup and is applying for federal Brownfields grant funds.

Jim Gulnac of the town has developed applications requesting federal Brownfields Site Assessment Grant funding for hazardous materials sites throughout the town (community wide), and has also developed clean-up applications for two properties, the River Watch and CGA sites.

If the town receives funding, the Department will assign project management staff to provide review and comment on all assessments, workplans, Quality Assurance Plans, and Health and Safety Plans. For cleanup at the River Watch and CGA sites, the Department's Voluntary Response Action Program ("VRAP") staff will provide review and comment on feasibility studies and remedial workplans, and will provide oversight (as necessary) of contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 287-4854 should you have any questions regarding this letter.

Sincerely,

Nicholas J. Hodgkins
Voluntary Response Action Program
Division of Remediation
Maine Department of Environmental Protection

Pc: Don West, Environmental Management Support, Inc.
Jim Gulnac, Town of Sanford
Wilkes Harper, Maine DEP

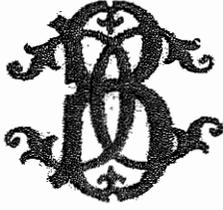
AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

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

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

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

ATTACHMENT 3
LETTERS OF SUPPORT
FROM COMMUNITY BASED ORGANIZATIONS



BERNIER ENTERPRISES, INC.

**18 Marc Drive
Sanford, Maine 04073**

207.651.0221

Board of Directors

**Dr. David M. Bernier, Ph.D.
President & Chief Executive Officer**

**Mrs. Theresa J. Bernier
Executive Vice President**

**Mr. James R. Bernier
Vice President**

November 21, 2011

Mr. Lee Burnett, Grants Writer
Town of Sanford
919 Main St.
Sanford, ME 04073

Dear Mr. Burnett:

I am very excited to learn that the Town of Sanford has decided to seek a \$200,000 grant in support of cleaning a neighborhood Brownsfield site, called CGA.

Bernier Enterprises has been an active real estate investment corporation since 1969, when my family planned, developed and built "Bernier's Country Living Mobile Home Park", on 76 acres that surrounded our home. It was my late-father's vision that the creation of affordable housing be available to residents of Sanford. The mobile home park grew to 80-homes, with hundreds of residents. Although we no longer own the property, it remains adjacent to our home, and we remain influential stewards of the community and are regarded as effective advocates and leaders.

From 1993 to 2001, I was the Chief, Congressional and Public Affairs, for three U.S. Surgeon Generals. On a daily basis, I worked with members of Congress, the White House, and numerous governmental agencies, such as the U.S. EPA, on matters affecting healthcare, to include public health issues affecting communities. Maine's Congressional Delegation, consisting of U.S. Senators Snowe and Collins and U.S. Congresswoman Chellie Pingree are well aware of the CGA site, and they have been very supportive of efforts to remediate of the site. At my invitation, the delegation and their staffs have visited the CGA site on numerous occasions over the years.

For the past 24-years, my family and neighbors have advocated for the clean-up of the CGA site and have written to the Maine Congressional Delegation, the U.S. EPA, Maine's Governor, Department of Environmental Protection, State Senators and Representatives, to name a few, pleading for assistance to remediate the property.

In early 2010, we were humbly thankful to have received overwhelming community support, working side-by-side with the Toxics Action Center, when we successfully advocated for the Sanford Town Council to assume ownership of the property, opening the door for the Town to receive State and Federal funding for the clean-up.

At the February 2, 2010, Town Council meeting when the full council voted in favor of assuming ownership of the property, the residents of New Dam Road and neighboring communities, notably the Country Living Mobile Home Park, Estes Lake Association, and Apache Campground, pledged our commitment to the Sanford Town Council, to join forces with the town and assist with the clean-up of the property.

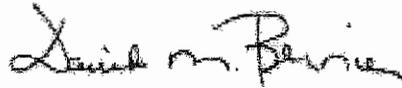
We continue to pledge our commitment to working with the town to:

- continue outreach, education and advocacy efforts through the www.CleanCGA.com website,
- continue to work with congressional representatives on appropriation requests and policy changes, and
- provide neighborhood oversight so redevelopment plans meet with goals of neighbors.

Neighbors have expressed interest with returning the property to the tax rolls and developed as a site for business or put to some productive public use. Ideas for reuse include: Consolidated Police and Fire sub-station, Park and Ride facility (with the building used as a car wash), Agricultural facility used by the community college system, and a Town Vehicular Maintenance facility or Sporting Complex

Thank you for the opportunity to provide a letter of support for this very important venture. The thousands of tourists who drive-by CGA enroute to neighboring Apache Campground, and the residents who drive-by CGA on a daily basis will be forever grateful when this grant is approved, and the property eventually developed into a site that will make us and the town very proud.

Sincerely,

A handwritten signature in black ink that reads "David M. Bernier". The signature is written in a cursive, slightly slanted style.

DAVID M. BERNIER, Ph.D.

November 22, 2011

Lee Burnett, Grant Writer
Town of Sanford
919 Main Street
Sanford, ME 04073

Re: leveraging Brownfields for economic development

Dear Mr. Burnett:

I am pleased to write on behalf of the Sanford Regional Economic Growth Council (SREGC) to inform you of our intention to continue our role in marketing Brownfields sites in Sanford to potential developers. The SREGC is a private 501(c)(6) development corporation governed by a seven-member board of directors that includes membership from the Industrial Development Corporation of Sanford, the Sanford-Springvale Chamber of Commerce and the Town of Sanford-Village of Springvale. The SREGC was established in 2009 to consolidate and strengthen private and public economic development efforts in the Sanford Region by encouraging the creation and retention of jobs and the investment in real and personal property in order to improve the tax base.

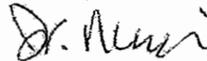
One of the key objectives of the SREGC partners is the redevelopment of Sanford's historic Mill Yard District which was once the economic engine for this community and this region. Several exciting opportunities have recently emerged within the district including: the town's construction of a much-needed road to support and facilitate development; developers like Brady-Sullivan and the Northland Group committed to converting former mill buildings into multi-million dollar mixed-use development projects; receipt of a coveted pilot grant from the EPA to ensure achievable action steps; and receipt of an FTA grant for the Sanford Transportation Center (STC) which will serve as an intermodal hub for public transportation and intercity bus riders. Certainly a coordinated approach to the cleanup and redevelopment of Brownfields sites will go a long way to restoring the Mill Yard's historic economic role.

These activities send a powerful signal to other developers about the development potential of Brownfield sites. But all of this depends on maintaining momentum. There are still many Brownfield sites that need to be cleaned up, such as the CGA site and the STC site in the Mill Yard. The SREGC pledges to continue its active marketing role by:

- publicizing Brownfields program developments on our website;
- holding community outreach events such as the Brownfields Redevelopment Open House scheduled for December 2nd; and
- actively showing developers around the Mill Yard.

We remain strongly committed to Sanford's economic improvements and consider the Mill Yard District a priority area in our ongoing efforts. Please let us know how we can continue to be supportive moving forward.

Sincerely,



James F. Nimon
Executive Director

*Thomas A. Fiore
53 Camp Road
Alfred, Maine 04002*

November 26, 2011

Mr. Lee Burnett, Grants Writer
Town of Sanford
919 Main Street
Sanford, ME 04073

Dear Mr. Burnett:

Thank you for contacting me as President of the Estes Lake Association regarding the former "CGA" property located in Sanford. The property has been discussed at several of our meetings, and has been a concern due to its prior use, contamination, and proximity to Estes Lake. The Association was pleased to learn the Town of Sanford has taken ownership, and is applying for a grant to clean the site, and possibly redevelop the land.

As Association President, I support this proposal to procure grant money to be used in cleaning the former CGA site. The association has also expressed its interest in seeing the site cleaned. I will be bringing this news forward to our next meeting, and will continue to keep our members informed of the process as it moves along. The association was very active in monitoring the neighboring property currently owned by the Maine Turnpike.

The Association is very interested in any future uses of this site, and would like to be informed of any possible proposed zoning changes, or proposed uses.

Thank you for your efforts, and feel free to contact me at any time.

Sincerely,



Thomas A Fiore
President, Estes Lake Association

ATTACHMENT 4
DOCUMENTATION OF LEVERAGED FUNDS

COOPERATIVE AGREEMENT HOME**Profile Information****Sanford, Town of**

Cooperative Agreement #: BF97117401

State: ME

Cooperative Agreement Type:

Assessment

Announcement Year: FY04

Award Date: 09/13/2004

Initial Project Period: 10/01/2004 to 10/15/2008

Current POP End Date:

Status: Closed Cooperative Agreement

Funding Source: Regionally Funded

Total Funded: \$200,000.00

Funding Type: Hazardous

PLEASE NOTE: Information shown is the most current in ACRES and may include draft and approved data.

Cooperative Agreement ContactsPrimary Contact: 

Frank Gardner (EPA Regional Brownfields Team)

g.gardner@epa.gov 6179181278

Data Reviewer: 

Frank Gardner (EPA Regional Brownfields Team)

g.gardner@epa.gov 6179181278

Cooperative Agreement Accomplishments

Accomplishment Type	Property Name	Fiscal Year Counted
Phase I Environmental Assessment	Aerofab - Parcel 19A ACRES Property ID:65981	FY09
Phase I Environmental Assessment	Former CGA, Inc. Property (Map R16 Lot 41A) ACRES Property ID:18048	FY08
Phase I Environmental Assessment	Gallo Property (Map 127, Lot 30) ACRES Property ID:52581	FY09
Phase I Environmental Assessment	No 1 Pond ACRES Property ID:52641	FY09
Phase I Environmental Assessment	Reeve- Riverwalk 2 Map J29, Lot 17E ACRES Property ID:52661	FY09
Phase I Environmental Assessment	Riverwalk 4 (Map 128, Lot 81) ACRES Property ID:52681	FY08
Phase I Environmental Assessment	Riverwalk 5 (Map 128, Lot 73) ACRES Property ID:52701	FY09
Phase I Environmental Assessment	Riverwalk 7 (Map J30, Lot 44A) ACRES Property ID:52721	FY09
Phase I Environmental Assessment	Riverwalk 7A (Map 130, Lot 6) ACRES Property ID:52722	FY09
Phase I Environmental Assessment	Stone & Stone Property (Map J30, Lot 44) ACRES Property ID:52621	FY09

Pre-POP Authorization

This Cooperative Agreement does not have Pre-POP authorization.

Properties Addressed By This Cooperative Agreement

City: State:

Property	Actions	Status	Current Owner
Former CGA, Inc. Property (Map R16 Lot 41A) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Sanford Mill Greenway-Washington St (G100NY00) <small>(Property Home) No Archive Available</small>	Enter Data	Approved	None
Gallo Property (Map 127, Lot 30) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Stone & Stone Property (Map J30, Lot 44) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
No 1 Pond <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Reeve- Riverwalk 2 Map J29, Lot 17E <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Riverwalk 4 (Map J29, Lot 81) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Riverwalk 5 (Map 128, Lot 73) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Riverwalk 7 (Map J30, Lot 44A) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Riverwalk 7A (Map J30, Lot 6) <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None
Aerofab - Parcel 19A <small>(Property Home) Submission Archive</small>	Enter Data	Approved	None

[Add Property to this Cooperative Agreement](#)

Assessment Activities

Property	EPA Funding	Completion Date	Activity	Actions	Status
Former CGA, Inc. Property (Map R16 Lot 41A)	\$4,000.00	01/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Former CGA, Inc. Property (Map R16 Lot 41A)	\$40,000.00	01/31/2008	Phase II Environmental Assessment	Enter Data	Approved
Reeve- Riverwalk 2 Map J29, Lot 17E	\$2,500.00	01/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Reeve- Riverwalk 2 Map J29, Lot 17E	\$28,000.00	06/30/2008	Phase II Environmental Assessment	Enter Data	Approved
No 1 Pond	\$3,500.00	06/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Aerofab - Parcel 19A	\$3,500.00	10/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 4 (Map J29, Lot 81)	\$2,500.00	11/30/2006	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 5 (Map 128, Lot 73)	\$2,500.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 7 (Map J30, Lot 44A)	\$2,500.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 7A (Map J30, Lot 6)	\$3,000.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Gallo Property (Map 127, Lot 30)	\$3,000.00	12/30/2006	Phase I Environmental Assessment	Enter Data	Approved
Stone & Stone Property (Map J30, Lot 44)	\$3,000.00	07/30/2008	Phase I Environmental Assessment	Enter Data	Approved

EPA Assessment Funding: \$98,000.00
 Leveraged Funding: \$0.00
 Total Funding: \$98,000.00
 NOTE: Funding marked for deletion not included in totals

Cleanup Activities

Property	Is Cleanup Required?	Completion Date	Actions	Status
Riverwalk 7 (Map J30, Lot 44A)	Unknown		Enter Date	Approved

Cleanup Jobs Leveraged: 0
 Leveraged Funding: \$0.00

NOTE: Funding marked for deletion not included in totals

Institutional & Engineering Controls

Property	Are ICs Required?	IC in Place	Are ECs Required?	EC in Place	Ready for Reuse?
Former CGA, Inc. Property (Map R16 Lot 41A)	No				No
Gallo Property (Map I27, Lot 30)	No				No
Stone & Stone Property (Map J38, Lot 44)	No				No
No 1 Pond	Unknown	Unknown			No
Reeves Riverwalk 2 Map J29, Lot 17E	Yes	No	Yes	Yes	No
Riverwalk 4 (Map I29, Lot 31)	No				Yes, 0.60 acres
Riverwalk 5 (Map I29, Lot 73)	No				No
Riverwalk 7 (Map J30, Lot 44A)	Yes	Yes			No
Riverwalk 7A (Map I30, Lot 6)	No				No
Aerofab - Parcel 19A	Unknown				No

Properties Ready for Reuse: 1
 Total Acres Ready for Reuse: 0.60

NOTE: Properties marked with an asterisk in the Ready for Reuse column are counted under another Cooperative Agreement. Their acre values are not included in the totals listed above.

Redevelopment and Other Leveraged Accomplishments

There are no Redevelopments for this Cooperative Agreement.

Resolution Environmental

Portland, Me. 207.767.1933

Nov. 22, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

My company, Resolution Environmental, LLC, fully supports the Town of Sanford's efforts to obtain Brownfields funding for the former CGA site in Sanford, ME. As you know, we have an interest in the development potential of that site. We have the capacity, experience, and resources to recycle durable materials from the CGA site. Our ultimate intention is to provide the Non-Brownfields related clean up at no-cost to the Town of Sanford.

As you know, Resolution Environmental, LLC, has more than 25 years experience disposing of environmental waste for hospitals, power companies, laboratories, colleges and prime industrial corporations. We are a growing company that is actively looking for sites that allow us to more efficiently recycle and dispose of waste products that our private clients and municipalities create. Logistics is a prime factor in my business philosophy, thus having the capacity to establish ourselves in the Town of Sanford allows us to be in place for the huge potential growth of this town. Sanford has a long history of manufacturing and what we believe is the basis for long term economic development in not just York County, but all of Maine.

If the Town of Sanford is successful in obtaining Brownfields grant funds, we understand the soil contamination at the former CGA site will be cleaned up to state and federal standards. If there are materials that remain on site because they are not eligible for cleanup funds, our company is prepared to take the following steps:

- Investigate recycling markets and if strong enough assume responsibility for recycling debris such as concrete, computer scrap, cloth bales, wood pallets, old tanks, steel, and paper. We estimate the value of our remediation efforts at approximately \$ 200,000.

Our company also has an interest in the development potential of the site. If the site can be cleaned up to state and federal standards, our company will explore options by taking the following steps.

- Investigate the acquisition of the property. Our decision would be based on availability of financing, the strength of markets, local and state permitting requirements, and neighborhood concerns
- Plan the construction of a facility that would act as a central location for scrap material sorting and recycling.
- Attempt to co-op the construction of a facility that would jump start other businesses.
- Work with local university/college for the development of a training facility for future recycling technologies.

If successful, we expect our operation will represent a capital asset of around \$500,000. We could employ up to 10 people initially, with up to 50 if we can grow to a full scale sorting capability. Jobs would range from trucking, material movement, maintenance, dispatch, logistics, technical engineering and management.

Best wishes in your grant writing efforts. We look forward to moving ahead with plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Carpenter". The signature is written in a cursive, flowing style.

Jack Carpenter
General Manager
Resolution Environmental, LLC



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

November 17, 2010

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

Thank you for your inquiry regarding additional resources for cleaning up contaminated sites in your community. The Maine DEP shares the Town of Sanford's commitment to reclaiming Brownfields sites for productive uses. We know of your excellent track record, having worked cooperatively with you on assessing contamination at the Aerofab site, and we would certainly welcome working with you again. I can recommend two potential funding sources:

- The 128A program makes available grants of up to \$50,000 per site.
- The revolving loan/grant program – jointly administered through Department of Economic and Community Development – makes available grants of up to \$200,000 to municipalities and non-profits. Loans are also available to developers.

Should you need additional resources, please don't hesitate to apply. We will give your request full consideration. Thank you.

Sincerely,

Jean Firth, Brownfields Coordinator
Division of Remediation
Bureau of Remediation and Waste Management

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

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

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

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143



SOUTHERN MAINE REGIONAL PLANNING COMMISSION

The Council of Governments
Serving the Municipalities of
Southwestern Maine

Acton

Alfred

Arundel

Baldwin

Berwick

Biddeford

Brownfield

Buxton

Cornish

Dayton

Denmark

Eliot

Fryeburg

Hiram

Hollis

Kennebunk

Kennebunkport

Kittery

Lebanon

Limerick

Limington

Lovell

Lyman

Newfield

North Berwick

Ogunquit

Old Orchard Beach

Parsonsfield

Porter

Saco

Sanford

Shapleigh

South Berwick

Stoneham

Stow

Sweden

Waterboro

Wells

York

November 23, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

Thank you for your inquiry regarding additional resources for cleaning up contaminated sites in your community. The Southern Maine Regional Planning Commission shares the Town of Sanford's commitment to reclaiming Brownfields sites for productive uses. We know of your excellent track record, having worked cooperatively with you on cleanup activities at the Sanford Mill and Aerofab sites, and we would certainly welcome working with you again. SMRPC has one potential funding source:

- The revolving loan/grant program administered by Southern Maine Regional Planning Commission— makes available grants of up to \$200,000 to municipalities and non-profits. Loans are also available to developers.

Should you need additional resources, please don't hesitate to apply. We will give your request full consideration. Thank you.

Sincerely,

Paul Schumacher
Executive Director



November 22, 2011

Lee Burnett, Grant Writer
Town of Sanford
919 Main Street
Sanford, ME 04073

Re: leveraging Brownfields for economic development

Dear Mr. Burnett:

I am pleased to write on behalf of the Sanford Regional Economic Growth Council (SREGC) to inform you of our intention to continue our role in marketing Brownfields sites in Sanford to potential developers. The SREGC is a private 501(c)(6) development corporation governed by a seven-member board of directors that includes membership from the Industrial Development Corporation of Sanford, the Sanford-Springvale Chamber of Commerce and the Town of Sanford-Village of Springvale. The SREGC was established in 2009 to consolidate and strengthen private and public economic development efforts in the Sanford Region by encouraging the creation and retention of jobs and the investment in real and personal property in order to improve the tax base.

One of the key objectives of the SREGC partners is the redevelopment of Sanford's historic Mill Yard District which was once the economic engine for this community and this region. Several exciting opportunities have recently emerged within the district including: the town's construction of a much-needed road to support and facilitate development; developers like Brady-Sullivan and the Northland Group committed to converting former mill buildings into multi-million dollar mixed-use development projects; receipt of a coveted pilot grant from the EPA to ensure achievable action steps; and receipt of an FTA grant for the Sanford Transportation Center (STC) which will serve as an intermodal hub for public transportation and intercity bus riders. Certainly a coordinated approach to the cleanup and redevelopment of Brownfields sites will go a long way to restoring the Mill Yard's historic economic role.

These activities send a powerful signal to other developers about the development potential of Brownfield sites. But all of this depends on maintaining momentum. There are still many Brownfield sites that need to be cleaned up, such as the CGA site and the STC site in the Mill Yard. The SREGC pledges to continue its active marketing role by:

- publicizing Brownfields program developments on our website;
- holding community outreach events such as the Brownfields Redevelopment Open House scheduled for December 2nd; and
- actively showing developers around the Mill Yard.

We remain strongly committed to Sanford's economic improvements and consider the Mill Yard District a priority area in our ongoing efforts. Please let us know how we can continue to be supportive moving forward.

Sincerely,

James F. Nimon
Executive Director

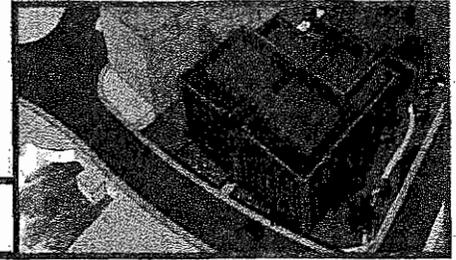


Land & Community Revitalization

BROWNFIELDS SUCCESS IN NEW ENGLAND

SANFORD MILL SITE

SANFORD, MAINE



PROPERTY DETAILS	Address: 61 Washington Street, Sanford, ME
	Former Use: Manufacture of fabrics, light bulbs, and plastic products
PARTNERS	Contaminants: Asbestos, lead-based paint, semi-volatile organic compounds (SVOCs), and PCBs
	Current Use: Housing, commercial, and retail space
	Owner: Town of Sanford
Maine Department of Environmental Protection (DEP), Maine Neighborhood Stabilization Program (NSP), Southern Maine Regional Planning Commission (SMRPC), Town of Sanford, Northland Enterprises LLC	

FUNDING DETAILS	EPA Brownfields Assessment Grant: \$110,000
	EPA Brownfields Cleanup Grant (ARRA): \$200,000
HIGHLIGHTS	Maine NSP Grant: \$3,000,000
	SMRPC Revolving Loan Fund Subgrant: \$200,000
	<i>Additional funding provided by Northland Properties LLC</i>
<ul style="list-style-type: none"> Leveraged various components of EPA's Brownfields program to redevelop abandoned mill. New mixed-use development will contribute to revitalization of historic mill district. 	



The Sanford Mill Site is an excellent example of a shovel-ready project that benefitted from American Recovery and Reinvestment Act (ARRA) funding.

The project is also a case study on how the various components of EPA's Brownfields program can be leveraged together to create the synergy needed to redevelop a brownfield. The work completed by the Town is considered a success because the ARRA funding has been fully drawn down to complete the cleanup of the Sanford Mill site and advance the project to the redevelopment phase.

Motivation for Redevelopment: Located along the Mousam River in southwestern Maine, Sanford (population 20,806) thrived from the late 1800s to the 1950s as a vibrant textile mill town. When the mills closed, more than 3,500 residents lost their jobs. Although the town was successful in recruiting new industry, most of the new industrial base relocated or closed by the 1990s. Today, the town's unemployment and poverty rates are consistently higher than the County and State rates, and the median household income is significantly lower than the County median. Many of the large mills that surround the Mousam River are abandoned and deteriorated, including the former Sanford Mill. It is estimated that there are more than 30 brownfields sites in downtown Sanford, many of which are within the Sanford Mills Historic District, a 7.5-acre historic area listed on the National Register of Historic Places.

Property History: The Sanford Mill was formerly used for the manufacture of fabrics, light bulbs, and plastic products. This use resulted in a range of environmental contaminants including semi-volatile organic compounds (SVOCs) and PCBs. The building also contained lead-based paint and asbestos.

Project Result: Under its Community-Wide Brownfields Assessment Grant, the Town of Sanford conducted Phase I and Phase II Environmental Site Assessments (ESAs) for the

property in 2008. The following year, the Town continued its assessment activities, completing a supplemental ground water assessment and cleanup planning. By completing all of this work ahead of time with its assessment grant, the Town was prepared to take full advantage of the opportunity presented by ARRA funding. In 2009, the Town was awarded a \$200,000 ARRA Brownfields Cleanup Grant, plus a \$200,000 subgrant from the Southern Maine Regional Planning Commission (SMRPC) through its EPA Brownfields Revolving Loan Fund. This shovel-ready cleanup project was initiated immediately on the award date of August 3, 2009.

Grant-funded cleanup activities were completed in December 2010. The Town has signed a Memorandum of Agreement with Northland Enterprises LLC, a private developer, to complete the lead-paint abatement and redevelop this historic mill into a combination of housing units and retail/commercial space. To support these efforts, the project received a \$3 million grant from the Maine Neighborhood Stabilization Program (NSP).

The cleanup and redevelopment of this property is part of an overall integrated effort to revitalize the entire Sanford Mills Historic District. Toward this end, the Town applied for and was awarded one of EPA's Area-Wide Planning pilot grants in 2010. EPA awarded just 23 of these innovative new grants nationwide to promote a coordinated and holistic approach to revitalizing neighborhoods impacted by numerous brownfields.

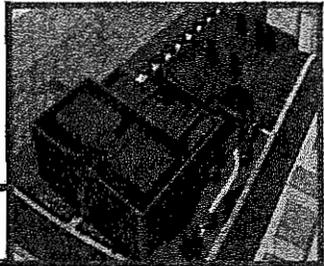
TIMELINE	
2008	Phase I and Phase II ESAs completed
2009	Supplemental assessment and cleanup Planning and implementation
2010	Grant-funded cleanup activities completed
2011 (expected)	Redevelopment lead-paint abatement to begin



Land & Community Revitalization

BROWNFIELDS SUCCESS IN NEW ENGLAND

FORMER AEROFAB FACILITY SANFORD, MAINE



PROPERTY DETAILS	Address:	3 Aerofab Drive and 0 Pioneer Avenue, Sanford, ME
	Size:	0.73 acres
	Former Use:	Dye house, aircraft manufacturing facility
	Contaminants:	Chlorinated volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, petroleum, asbestos-containing material
PARTNERS	Current Use:	Parking lot
	Owner:	Town of Sanford
	Maine Department of Environmental Protection (DEP), Maine Neighborhood Stabilization Program (NSP), Southern Maine Regional Planning Commission (SMRPC), Town of Sanford, Northland Enterprises LLC	

FUNDING DETAILS	EPA Brownfields Assessment Grants (Phase I, 2011 Phase II, and Supplemental Assessments):	\$50,000
	EPA Brownfields Cleanup Grant:	\$400,000
	SMRPC Revolving Loan Fund Subgrant:	\$200,000
	Maine DEP (2008 Phase II Assessment):	\$17,000
HIGHLIGHTS	<ul style="list-style-type: none"> Removed or capped 500 tons of contaminated soil. Green building demolition recycled 95% of materials. New parking lot signals renewed investment in downtown, removes blighted structure, and provides parking to support nearby redevelopment projects. 	

Motivation for Redevelopment: From the 1800s through mid-20th century, the Town of Sanford, Maine was a vibrant mill town home to many sawmills and textile manufacturers. Sanford's economy was devastated when the mills closed in the 1950s, resulting in a loss of 3,500 jobs. Despite recruiting some new industry, the town's economy has never fully recovered. Today, unemployment and poverty rates in Sanford are consistently higher than the county and state rates, and median household income is below the county level. A product of its industrial past, downtown Sanford has more than 30 brownfield sites. Many of these sites are within the Sanford Mills Historic District, a 7.5-acre district that encompasses 14 historic buildings. The dilapidated mill buildings are a constant reminder of the area's hard times, and their redevelopment is at the center of Sanford's downtown revitalization strategy.

Property History: Located adjacent to the Mousam River in downtown Sanford, the former Aerofab building was built in the late 1800s as part of the Sanford Mills complex, a woolen mill. The building was used as a dye house and for storage until the mill closed in the 1950s. In 1960, Lake Aircraft purchased the property and used the facility to fabricate amphibious aircraft components under the Aerofab brand. Lake Aircraft vacated the site in 2002.

Because of the site's former industrial uses, the town suspected that the property had environmental contamination. Using funding from a Community-Wide EPA Brownfields Assessment Grant, the Town conducted Phase I and Phase II Environmental Site Assessments (ESAs). The assessments confirmed the presence of soil and groundwater contamination, including chlorinated volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and petroleum. The abandoned building also contained numerous hazardous substances as well as asbestos-containing materials.

Project Results: In 2009, the Town of Sanford acquired the two parcels that comprise the former Aerofab facility through eminent domain with the intention of remediating and redeveloping the site. The Town used \$400,000 in EPA Brownfields Cleanup Grants and a \$200,000 subgrant from the Southern Maine Regional Planning Commission (SMRPC) to initiate cleanup efforts. In order to fully address the contamination under the building and prevent it from entering the Mousam River, the structure had to be fully removed, an action that required Section 106 historical review. The building deconstruction incorporated concepts from EPA Region 1's Clean and Green Policy for contaminated sites, recycling 95% of materials. Cleanup activities included the removal of an onsite petroleum storage tank and the removal or capping of more than 500 tons of contaminated soil.

The Aerofab property is being redeveloped into a parking lot that will serve the adjacent Sanford Mill, a brownfield redevelopment project that has transformed an abandoned mill into a housing and commercial complex. The 60-space parking lot has the potential to be retrofitted into a multi-story parking facility at a later date. Together with the Sanford Mill redevelopment, the new parking lot signals renewed investment in Sanford's downtown and contributes to revitalization efforts by removing a blighted structure and providing the parking necessary to support nearby projects.

TIMELINE	
Oct. 2007	Phase I ESA completed
May 2008	Phase II ESA completed
June 2009	Updated Phase I ESA completed
June 2009	Town assumes ownership of property
Dec. 2009 – Summer 2011	Site cleanup
Spring 2011	Additional Phase II ESA completed
Fall 2011	Parking lot construction completed

ATTACHMENT 5

DOCUMENTATION OF COMMUNITY INVOLVEMENT



Public Meeting Notice

PUBLIC NOTICE – TOWN COUNCIL
COUNCIL CHAMBERS – THIRD FLOOR
TOWN HALL ANNEX

TUESDAY, November 15, 2011
7:00PM

Town of Sanford
Town Council
Public Meeting Notice

The Town of Sanford will hold a Public Meeting on Tuesday, November 15, 2011 at 7:00 P.M. at the Town Council Chambers, Sanford Town Hall, 919 Main Street, Sanford, Maine:

The purpose of the meeting is to discuss two draft Brownfields Cleanup Grant Applications and Analysis of Brownfields Cleanup Alternatives (ABCAs) to the EPA for the properties referred to as the Town of Sanford Multi Modal Site located on Tax map J29, lot 17E, High Street Sanford and the Former CGA Site located at 229 New Dam Road on Tax Map R16 lot 41A, Sanford. The Cleanup Grants will be for the remediation of soil contamination at these properties. The Town will prepare the draft application for the public's review and comment and will hold a public meeting to describe the information and the plans for cleanup in the grant application. Comments are due back to the planning office by November 27, 2011. The applications will be available to the public for review and comment from November 14th through November 27th. The draft grant applications and ABCAs will be available for review on the Town web site (www.sanfordmaine.org) and at the Planning Office. If you have questions or written comments please contact Jim Q. Guinac, Director of Planning and Community Development at jquguinac@sanfordmaine.org.

All interested residents are invited to attend the public hearing and will be given an opportunity to be heard at that time. TDD/TTY users may call 711. If you are physically unable to access any of the Town's programs or services, please call Sherry Lord at 324-9173 so that accommodations can be made.

Date Posted:

Town of Sanford



From the Desk of
Mark A. Green

Memorandum

Date: Nov. 23, 2011
To: Lee Burnett
From: Mark Green
Re: Town Council meeting summary

At the regularly posted and televised Town Council meeting Nov. 15, 2011, the council heard a presentation from Planning Director James Gulnac on plans to submit three applications for Brownfields funding – one application for an town-wide assessment grant and two applications for cleanup grants. After hearing the presentation, the council asked for comments. None were received. The Town Council voted 6-0 to approve submitting the applications. Since the meeting, no comments have been received in writing or in person.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Mark A. Green", written over the typed name below.

Mark A. Green
Town Manager

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

ATTACHMENT 6

DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

1. INTRODUCTION AND BACKGROUND

1.a. Site Location

The CGA, Inc. site is located at 229 New Dam Road, Sanford, Maine (hereinafter, "the Site").

1.b. Previous Site Uses and Previous Cleanup and Remediation

The approximately 17-acre Site was developed in the early 1970s and operated as a pre-cast concrete manufacturer for approximately 5 years. The Site was then used as an electronic circuit board recycling facility from the mid 1970's through 1987, and this use continued intermittently until 1991. The Site was essentially abandoned after 1991. One unsecured 50-foot by 125-foot cement block building is located at the Site. The Site is currently vacant.

Large waste piles of circuit board shear trim, tires, wood, metal, rubber, plastic, cloths, cans, cardboard, and concrete were left behind by the circuit board recycling facility and are currently unsecured at the vacant Site. Furthermore, hazardous building materials including lead-based paint and asbestos, as well as universal and/or hazardous wastes have been documented in association with the Site building.

On August 25, 2010, the Town of Sanford contracted an environmental services provider and an environmental professional to remove an 8,000-gallon UST from the Site. During the removal, a second 2,000-gallon UST was discovered and its contents, mainly water, spilled into the excavation. Both USTs were removed on this day and based on the conditions at the Site following removal, no further action was required.

1.c. Site Assessment Findings

A Phase I ESA was performed in January 2007 under the Sanford Brownfields Assessment Program that identified five recognized environmental conditions (RECs):

- REC-1. Documented metals impacts to soil, sediment, groundwater, and surface water
- REC-2. Historical Site use (pre-cast concrete manufacturing)
- REC-3. Historical Site use (circuit board recycling facility)
- REC-4. Illegal dumping of wastes
- REC-5. Documented on-site gasoline pump (location of storage tank unknown)

A subsurface investigation conducted by the Maine Department of Environmental Protection (DEP) in March 2000 and a Phase II Environmental Site Assessment conducted under the Town of Sanford's Brownfields Assessment Program in February 2008 have identified concentrations of copper, zinc, arsenic, lead, thallium, and gasoline-range petroleum hydrocarbons that are in excess of the applicable action levels in various environmental samples collected from the Site. Impacted media has been documented to include surficial soil, subsurface soil, surface water, sediment, and groundwater. On-site contaminated media was identified primarily within the 3-acre developed area of the Site. In addition, the Site is located over a mapped significant sand and gravel aquifer and is within 1,000 feet of a public drinking water supply source, the New Dam Municipal Well. Based on the conclusions of the Maine DEP subsurface investigation, copper concentrations detected in the New Dam Municipal Well have been attributed to the Site, which indicates a much larger potential off-Site area of contamination.

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

1.d. Project Goal

The goal of the CGA, Inc. project is the removal and proper disposal of the waste circuit boards and other Maine DEP Special Waste, the removal and disposal of hazardous and contaminated building materials, and the covering of remaining contaminated soil to prevent risk of exposure. The removal of these materials will eliminate any potential continuing source of contamination and will allow for the further assessment of environmental media located below and in the vicinity of the waste piles.

Following remediation, the Site is proposed to be redeveloped as a recreational facility that will include a baseball diamond, a soccer field, and walking trails that will connect to the adjacent Town-owned conservation land.

2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.a. Cleanup Oversight and Responsibility

The cleanup will be overseen by an environmental professional in coordination with applicable guidelines and regulations of the Maine DEP and U.S. Environmental Protection Agency (EPA). All documents prepared for the Site will be submitted to the Maine DEP under Brownfields Site No. REM00828.

2.b. Cleanup Standards for Major Contaminants

The cleanup standards for the Site are anticipated to be the Maine DEP Remedial Action Guidelines (RAG) for Soil Contaminated with Hazardous Substances, The Maine DEP Maximum Exposure Guidelines (MEG) for Drinking Water, and the Maine DEP Remedial Action Guidelines (RAG) for Petroleum contaminated Sites in Maine. However, it is possible that additional regulatory standards will be applicable based on currently unknown Site conditions, or that risk-based cleanup standards will be used in accordance with Maine DEP guidelines.

2.c. Laws and Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Brownfields Revitalization Act, the Federal Davis-Bacon Act, the state environmental law, and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits and manifests will be obtained prior to commencement of the work.

3. EVALUATION OF CLEANUP ALTERNATIVES

3.a. Cleanup Alternatives Considered

To address contamination at the Site, three different cleanup alternatives were considered and are described below:

- Alternative 1: No Action
- Alternative 2: Excavation and off-Site disposal of Maine DEP Special Waste, characterization and on-Site disposal of contaminated soil using engineered controls, quarterly groundwater monitoring, and demolition and disposal of hazardous and contaminated building materials.
- Alternative 3: Excavation and off-Site disposal of Maine DEP Special Waste, excavation and off-Site disposal of contaminated soil, groundwater pump and treat system, and demolition and disposal of hazardous and contaminated building materials.

3.b. Cost Estimate of Cleanup Alternatives

To satisfy the U.S. EPA requirements, the effectiveness, feasibility, and cost of each alternative were considered prior to selecting a recommended cleanup alternative.

3.b.i. Effectiveness

- Alternative 1: This alternative is not effective in controlling or preventing the exposure of receptors to contamination at the Site, or in the elimination of a potential continuing contaminant source.
- Alternative 2: Excavation and off-Site disposal of Maine DEP Special Waste is an effective method for eliminating the direct contact exposure pathway, will be effective at eliminating a potential continuing source of contamination, and will protect the nearby drinking water supply well. Covering contaminated surficial soil at the Site is an effective way of eliminating the direct contact exposure pathway. Quarterly groundwater monitoring will provide valuable information regarding the quality of the groundwater over time. This information will be useful in making decisions regarding groundwater at the Site in the future. Removal and off-Site disposal of hazardous and contaminated building materials is an effective way of eliminating all exposure pathways associated with these materials.
- Alternative 3: Excavation and off-Site disposal of Maine DEP Special Waste and impacted soil is an effective method for eliminating the direct contact exposure pathway, will be effective at eliminating a potential continuing source of contamination, and will protect the nearby drinking water supply well. A groundwater pump and treat system is an effective method of remediating contaminated groundwater, but may take many years to achieve the desired result. Removal and off-Site disposal of hazardous and contaminated building materials is an effective way of eliminating all exposure pathways associated with these materials.

3.b.ii. Feasibility and Ease of Implementation

- Alternative 1: This alternative is easy to implement, as no actions will be conducted.
- Alternative 2: This alternative would utilize standard construction and transportation techniques for Maine DEP Special Waste containerization, off-Site transport, and disposal. Standard construction techniques would also be used to install the engineered soil cover. The collection and analysis of groundwater samples from the Site would be easily conducted using standard environmental sampling techniques. Finally, standard demolition and disposal techniques by qualified personnel would be used for the removal and disposal of hazardous and contaminated building materials. This alternative is technically practical and easily implementable at the Site.
- Alternative 3: This alternative would utilize standard construction and transportation techniques for Maine DEP Special Waste and impacted soil containerization, off-Site transport, and disposal. The installation of a groundwater collection system, pumps, treatment cells, a pump house, and a power source would also be technically feasible but would not be easily implementable, as it would interfere with the proposed redevelopment of the Site. Regular maintenance of the groundwater treatment system would also be required to assure proper functionality. Finally, standard demolition and disposal techniques by qualified personnel would be used for the removal and disposal of hazardous and contaminated building materials. This alternative is technically practical; however, the implementation of the groundwater pump and treat system is not feasible considering the redevelopment goals of the Site.

CGA, Inc. Site Brownfields Cleanup Grant Application, Sanford, Maine

3.b.iii. Cost Effectiveness

- Alternative 1: There would be no cost associated with Alternative 1.
- Alternative 2: The cost of Alternative 2 is estimated to be approximately \$399,400.
- Alternative 3: The cost of Alternative 3 is estimated to be approximately \$2,000,000.

3.c. Recommended Cleanup Alternative

The recommended cleanup alternative for the Site is presented below:

Alternative 2 is the recommended cleanup alternative for the Site because it is considered to be the most practical alternative to mitigate the risk posed by the contamination considering the proposed redevelopment scenario, reliability, effectiveness, feasibility, ease of implementation, and cost. Alternative 1 cannot be recommended because it does not address the risks posed by the contamination. Alternative 3 is not recommended because it involves removal of additional contaminated soil that can be more practically managed on-Site. Alternative 3 also involves the design, construction, operation, and maintenance of a groundwater pump and treat system which is not a practical, easily implementable, or cost-effective remediation technique, considering the proposed redevelopment of the Site.

ATTACHMENT 7

SPECIAL CONSIDERATIONS CHECKLIST FROM APPENDIX 3

Appendix 3 Special Considerations Checklist

Please identify (with an **X**) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- Community population is 10,000 or less
- Federally recognized Indian tribe
- United States territory
- Applicant assisting a Tribe or territory
- Targeted brownfield sites are impacted by mine-scarred land
- Targeted brownfield sites are contaminated with controlled substances
- Community is impacted by recent natural disaster(s)
- Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant
- Community is implementing green remediation plans