

APPENDIX C

Maine Department of Environmental Protection Records

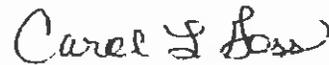
Phase I Environmental Site Assessment
Former Prime Tanning Company
20, 29, 34, and 35 Sullivan Street
Berwick, Maine

Prepared for:
Meriturn Partners, LLC
San Francisco, California

Phase I Environmental Site Assessment for Prime Tanning Company, Inc., 20, 29, 34 and 35 Sullivan Street, Berwick, ME



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1.0 Introduction

1.1 Purpose

ENSR Corporation (ENSR) was retained by Meritum Partners (Meritum) to perform an environmental site assessment (ESA) to identify recognized environmental conditions (RECs) at the Prime Tannery property located at 20, 29, 34 and 35 Sullivan Street, Berwick, York County, Maine (subject site). ENSR received authorization to perform the ESA on July 2, 2007 with access to conduct the assessments upon announcement of a merger on August 13, 2007. ENSR representative Cheryl A. Cormier, PG, Project Manager, conducted the site visit on August 27, 2007. At the subject site, Ms. Cormier met with Ron Allard, the facility's Engineering and Regulatory Compliance Director, who provided information regarding the current and historical operations.

1.2 Scope-of-work

This assessment has been performed in accordance with ENSR's Proposal number 08742-C81, dated June 27, 2007. Tasks performed by ENSR as a part of the ESA are described in the proposal.

1.3 Study limitations

This report describes the results of ENSR's due diligence assessment to identify the presence of environmental liabilities materially affecting the subject property utilizing publicly available, practically reviewable and reasonably ascertainable information, as defined by ASTM E1527-05, which meets the requirements of 40 CFR Part 312 and is intended to constitute *all appropriate inquiry* for purposes of the landowner liability protections (LLPs).

In the conduct of this due diligence investigation, ENSR has attempted to independently assess the presence of such problems within the limits of the established scope of work as described in our proposal. As with any due diligence evaluation, there is a certain degree of dependence upon oral information provided by facility or site representatives which is not readily verifiable through visual observations or supported by any available written documentation. ENSR shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this assessment was performed.

This report and all field data and notes were gathered and/or prepared by ENSR in accordance with the agreed upon scope of work and generally accepted engineering and scientific practice in effect at the time of ENSR's assessment of the subject property. The statements, conclusions, and opinions contained in this report are only intended to give approximations of the environmental conditions at the subject property.

This report is prepared pursuant to an agreement between the client and ENSR and is for the exclusive use of the client. No other party is entitled to rely on the conclusions, observations, specifications, or data contained herein without first signing an ENSR generated Reliance Letter. A third party's signing of the ENSR Reliance Letter is a condition precedent to any additional use or reliance on this report.

The passage of time may result in changes in technology, economic conditions, site variations, or regulatory provisions which would render the report inaccurate. Reliance on the report after the date of issuance as an accurate representation of current site conditions shall be at the user's sole risk. Should ENSR be required to review the report after six (6) months from its date of submission, ENSR shall be entitled to additional compensation at then existing rates or such other terms as may be agreed upon between ENSR and the client.

As the scope of work for this project did not include an environmental compliance review, files pertaining to air, water, and hazardous waste compliance were not reviewed at the facility or the local and state governmental agencies.

1.4 Site-specific limitations

It should be noted that ENSR did encounter material constraints in the performance of this environmental due diligence investigation. The following constraints were encountered:

- At the time of the site inspection, large quantities of equipment and chemical storage areas were observed throughout the facility, and equipment storage was observed outside of the building, which limited visual inspection of the interior and exterior surfaces;
- It was not possible to inspect every office space within the building during the site inspection. Given the similarity of construction of these office spaces, it was determined unnecessary to inspect every space. Instead, the interior inspection focused on the process areas and chemical storage areas.

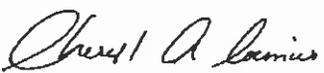
1.5 Data failure/Data gaps

Per the ASTM Standard, historical research is complete when either: 1) the objectives in ASTM Sections 8.3.1 through 8.3.2.2 are achieved; or 2) data failure is encountered. Specific data failures/data gaps encountered during the assessment are discussed, as appropriate, throughout this report. A list of the data failures is provided in Section 7.0 of this report.

1.6 Environmental professional statement

I declare that, to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in §312.10 of 40 CFR 312 and I have the specific qualifications based on education, training, and experience to assess a site of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Name: Cheryl A. Cormier, PG Title: Project Manager

Signature:  Date: 9/14/07

2.0 Site description

2.1 Location

The subject property consists of four non-contiguous parcels of land totaling approximately 11.4 acres, located at 20, 29, 34 and 35 Sullivan Street, York County, Berwick, ME. The subject property is located in downtown Berwick on the east and west side of Sullivan Street, north and south of Jordan Street, north and south of Wilson Street and west of School Street. Two of the parcels are improved with structures (the main tannery operations buildings on one parcel and a smaller receiving building on the other), one parcel is used for parking and the fourth is vacant at the present time. According to records maintained by the Berwick Town Hall and information from the site contacts, the parcels are owned by Prime Tanning Company, Inc. (Prime). The subject property is associated with Assessors' Map U4, Lots 146, 133, 130, and 95. Figure 1 provides a site location map for the subject property. Figure 2A depicts the layout of the parcels and structures. Figure 2B depicts the structures on the largest parcel and Figure 2C depicts the smaller receiving structure. Appendix A provides site photographs.

2.2 Current use of the subject property

The subject property is occupied by Prime Tanning Company, Inc. Prime receives blue stock hides from their St. Joseph, MO plant, which are delivered to the Blue Stock building, located at 35 Sullivan Street (Refer to Figure 2C). The hides are sorted and some are shaved to level out the skins at this location. The hides are then transported to the main facility (20 Sullivan Street) via truck for coloring, re-tanning, and finishing. The hides are placed in production mills (wooden drums) with water and tanning agents (pigments/dyes). The drums rotate then the water solution is discharged. Some hides are placed into mills for water proofing (silicone-based). The hides are then wrung to remove excess moisture. Some hides are further processed with oils (fattiqualoring), which helps with softening the leather.

Once the hides have been wrung, they are ready for drying. The facility utilizes three drying processes: pasting where the hides are pasted onto glass plates with a starch-based paste, stretched and then the pasting plate is put through a dryer; toggling where skins are stretched onto a metal plate, held in place with clips (toggles), then put through a dryer; and, vac drying, where the skins are placed on plates and heat is applied and moisture vacuumed from the skins.

The hides are put through a buffing machine which sands the hides. The hides are finished either with paint or stain. The paint is applied either using a spray application or directly applied. Some hides are then embossed with an embossing machine which gives the leather its texture (smooth, snakelike, grainy, etc). The hides are then placed on a conveyor where they are measured, stamped and boxed for shipment.

The facility has R&D areas where smaller scaled operations of testing pigments, stains, paints, and milling occur (Figure 2B).

The facility maintains a pre-treatment plant (neutralization) for process waste water. The facility currently generates approximately 200,000 gallons of process waste water per day. The treatment plant screens the water to remove solid debris, then the water is treated with pH adjusters (lime), polymers added as needed (aluminum chloride), then gravity fed to the Berwick Sewer District (BSD) pump station, which is located adjacent to the treatment building, and subsequently to the Berwick Sewer District plant.

Outbuildings located at the Main Plant include a small carpenter shop and a shed where oil and/or hazardous materials (OHM) were formerly stored along with an aboveground storage tank (AST) that formerly contained mineral spirits, and equipment storage. Information pertaining to this structure is discussed in further detail in Section 6.0.

Exterior equipment storage areas were observed east-southeast at the Main Plant. Equipment was stored on the ground, paved surfaces or within sheds. In addition, a pile of sand, concrete blocks and pallets were observed to be stored in the northern portion of the paved parking lot north of Wilson Street.

Paved areas are located surrounding the main plant to the north, east and south with grassy areas east of the paved area near Wilson Street and School Street. A thin strip of grass and trees is located along the northern property boundary of the Main Plant along Wilson Street. A chain-link fence is located along the northern, eastern and western property boundary of the Main Plant.

Paved areas were observed along the southern side of the Blue Stock building, with grassy areas to the east and north. A grassy former house lot is located south of the Blue Stock building at the southeast corner of Jordan Street and Sullivan Street. A paved parking is located at the northeast corner of Sullivan Street and Wilson Street. Grassy areas are located in the western portion of this parcel with wooded areas in the northern portion of this parcel. All 4 parcels are shown in Figure 2A, the Site Plan. Details of the Main Plant and Blue Stock buildings are shown on Figures 2B and 2C, respectively.

2.3 Description of structures

Main Plant

The building is a two story 225,919 square-foot concrete block structure constructed on a concrete slab foundation. According to the Assessors' office, the original building was constructed in 1850. According to the site contact, there are 32 buildings at the Main Plant, which were the result of building additions to the original structure.

Shipping and receiving areas are located along the northern and eastern sides of the building. The second floor of the building is primarily used for offices and measuring/stamping. The first floor of the building is used for processing the hides, chemical storage areas, and R&D areas. A shed building, constructed in 1966 is located in the southeastern portion of the property and was formerly used for chemical storage and currently for storage of miscellaneous dry chemical and miscellaneous equipment. A carpenter shop is located in the southeastern portion of the property. Refer to Section 6.0 for additional detail.

A waste water treatment plant is located in the eastern portion of the property. The building is one-story and is of concrete block construction on a poured concrete slab.

Blue Sort Warehouse

The blue sort warehouse is a one-story light industrial style building consisting of approximately 29,652 square feet of area. The building is of steel frame construction on a concrete slab foundation. According to the Assessors' office, the building was constructed in 1974. Shipping and receiving areas are located along the western side of the building.

There are no structures on the parking lot north of the Main Plant or the vacant grassy lot south of the Blue Sort warehouse. Both of these parcels were formerly residential lots, according to the site contact, information obtained from the Assessors' Office, and historical topographic map interpretation.

2.4 Utilities

The Main Plant and the Blue Sort warehouse are serviced with municipal water and sewer from the Town of Berwick, and electricity from Central Main Power. According to the site contact, the facility connected to the municipal sewer system during the late 1960s/early 1970s. Prior to that time, waste water was likely discharged directly to the Salmon Falls River. In ENSR's opinion, the historic discharge of process water is

considered an REC as it is likely that metals from the tanning process and inks would have impacted sediment at the outfall location.

According to the Assessors' information, a former residence was located on the grassy lot south of the blue sort building, which burned down in 1995 and a former residence and detached garage were located on the paved parking lot, which was removed in June 2007. It is likely that former septic systems were associated with these former residential buildings.

The Main Plant is heated with steam fueled by #6 oil and the Blue Sort warehouse is heated via forced hot air fueled with #2 oil. The fuel is stored in aboveground storage tanks located on both parcels. Additional information pertaining to fuel oil storage tanks is provided in sections 4.0 and 6.0.

A review of historical deeds documents the use of water wells at some of the properties which were purchased by Prime. No evidence of water wells was observed at the subject property by ENSR at the time of the site inspection.

2.5 Current use of adjoining properties

The following table provides a description of the properties adjacent to the boundaries of the subject property.

Direction from site	Adjacent land use description
North	<p><u>Main Plant</u> – residential properties about the northeast corner, beyond which is the intersection of School Street and Wilson Street. Directly north is Wilson Street beyond which are the paved parking lot for the subject property, residential properties, an elementary school, and an auto repair facility.</p> <p><u>Blue Sort Building</u> - Goodwin Street beyond which is a church and residential properties.</p> <p><u>Paved Parking Lot</u> – Residential properties and the elementary school (northeast).</p> <p><u>Grassy Lot</u> – Jordan Street beyond which is the Blue Sort Building.</p>
East	<p><u>Main Plant</u> – residential properties and School Street, beyond which are residential properties, fire department, and an ice cream shop.</p> <p><u>Blue Sort Building</u> – Sullivan Street beyond which is the paved parking lot.</p> <p><u>Paved Parking Lot</u> – Elementary School beyond which is auto repair facility and residential properties.</p> <p><u>Grassy Lot</u> – Sullivan Street beyond which is the Main Plant.</p>
South	<p><u>Main Plant</u> – Commercial properties (Subway Restaurant, tanning salon, insurance company beyond which is the intersection of Berwick Street and Sullivan Street and a Gateway gasoline station.</p> <p><u>Blue Sort Building</u> – Jordan Street beyond which is the grassy lot.</p> <p><u>Paved Parking Lot</u> – Wilson Street beyond which is the Main Plant.</p> <p><u>Grassy Lot</u> – Residential Properties.</p>

Direction from site	Adjacent land use description
West	<p><u>Main Plant</u> – Sullivan Street beyond which are (from the northwest to southwest) the grassy lot, residential properties, a paved parking lot for Town Hall (formerly owned by Prime), Eleanor’s Way, and the Town Hall.</p> <p><u>Blue Sort Building</u> – Residential properties.</p> <p><u>Paved Parking Lot</u> – Sullivan Street beyond which is the Blue Sort Building.</p> <p><u>Grassy Lot</u> - Residential properties.</p>

None of the abutting properties were identified on contamination-related databases which are considered to be RECs to the subject property.

3.0 User provided information

Section 6 of the ASTM Standard states that certain tasks, which will help to determine the possibility of RECs associated with the subject property, are generally conducted by the ESA report user. These tasks include reviewing title records for environmental liens or activity and land use limitations and considering awareness of any specialized knowledge about the subject property (e.g., information about previous ownership or environmental litigation), experience related to RECs at the subject property, and/or significant reduction in the purchase price of the site. Per the agreed scope-of-work, information related to these items should be provided by the ESA report user to ENSR. To assist the user in gathering information that may be material to identifying RECs, ENSR has provided Prime Tanning Company, Inc. the User Questionnaire from the ASTM Standard.

3.1 Title records/Environmental liens

The user did not provide information concerning any environmental concerns associated with title records, nor was the user aware of environmental liens on the subject property. According to the environmental lien search performed by EDR, no environmental liens currently exist for the subject property. In addition, according to Meritum Partners, LLC there are no environmental liens on the property to the best of their knowledge. Copies of the ASTM User Questionnaire and the EDR environmental lien search are included in Appendix B.

3.2 Specialized knowledge/Value reduction issues

The user had no specialized knowledge pertaining to the subject property or related on-site operations of environmental concern, nor was the user aware of site valuation reduction issues for the subject property.

3.3 Reason for performing the assessment

ENSR was authorized by Meritum Investors, LLC to perform this Phase I ESA as part of a merger of the subject property with another tanning company.

3.4 Other

Other than the documentation discussed in this report, the user was not aware of any additional information relative to the subject property.

4.0 Records information

4.1 Standard environmental records

Standard environmental record sources are defined in Section 8.2.1 of the ASTM standard. These records consist of selected federal and state environmental databases. ASTM also specifies the appropriate search distances from the subject property for which these records should be reviewed. ENSR retained the services of EDR of Milford, Connecticut to provide specified state and federal regulatory list information for potential sites of environmental concern located at or in the vicinity of the subject property. EDR maintains a computerized Geographic Information System (GIS) listing of various state and federal databases in accordance with the ASTM standard. The database search was based upon ASTM-specified standard record sources. Additionally, databases searched by EDR satisfy records review requirements of the *all appropriate inquiry* rule. EDR includes these databases, when available, as a part of its report. Descriptions of each database are provided in Part GR-1 of the EDR database report, Appendix C of this assessment report.

The EDR report includes various reports detailing database information for each of the facilities identified/geocoded within the specified radius. Additional sites with recognized environmental risks were identified, but EDR was not able to map them to specific locations due to insufficient/contradicting address information. These sites were included in EDR's report as "orphan" sites. Orphan sites are included in the summaries below as appropriate. The site was not identified as being within a one mile radius of tribal lands.

Sites identified within listed search radii of Subject property

Database (search distance)	Findings
NPL (1 mile)	No sites identified.
Delisted NPL (1/2 mile)	No sites identified.
CERCLIS (1/2 mile)	No sites identified.
CERCLIS NFRAP (1/2 mile)	No sites identified.
RCRA TSD (1/2 mile)	No sites identified.
CORRACTS (1 mile)	No sites identified.
RCRA Generator (site and abutters)	Subject property identified, discussed below.
State Hazardous Waste Sites (SHWS) (1 mile)	Three sites identified, one located 920 feet south-southwest beyond Salmon Falls River, one located over 3,700 feet south and beyond Salmon Falls River, and one located over 5,000 feet south-southeast and beyond Salmon Falls River. Based on distance and location of these properties on the opposite side of the Salmon Falls River, none of these properties are considered RECs.
State VCP Sites (1/2 mile)	No sites identified.

Database (search distance)	Findings
UST (site and abutters)	Two sites identified (including subject property). The Town Hall building located southeast of the subject property beyond Sullivan Street is listed as having a 500-gallon #2 fuel oil UST removed in 1997, and replaced with a 1,000-gallon double-walled UST. As this property is not identified on any contamination-related database, it is not a REC to the subject property. Subject property discussed below.
LUST (1/2 mile)	Eight sites identified – two sites (same location) located south of the intersection of School Street and Sullivan Street and downgradient, three sites located over 1,400 feet south and downgradient (two of which are closed), one site located over 1,000-feet west and cross-gradient, and one site located over 1,000 feet northeast and cross-gradient. Based on distance and/or gradient, these sites are not considered RECs. One site located approximately 200 feet east-northeast and up to cross-gradient, discussed below.
AST (site and abutters)	Subject property identified, discussed below.
ALLSITES (site and abutters)	None Identified.
LAST (site and abutter)	None identified.
Landfills (1/2 mile)	None identified.
State Spill Incidents (site only)	Subject property identified, discussed below
Brownfields (1/2 mile)	One site identified, located over 900 feet south-southwest beyond Salmon Falls River. Based on location beyond river, this is not considered a REC to the subject property.
Engineering & Institutional Controls (site only)	None identified.
ERNS (site only)	None identified.

The subject property is identified on the ME Spills database, AST, AIRS, Tier 2, UST database, and LUST databases. ENSR reviewed spill reports on-line at the Maine DEP. A summary of information pertaining to spills at the subject property is provided below.

Spill ID	Date	Source	Amount/Product	Remediation	Comments
P-337-1983	5/3/1983	Corrosion/Piping	125 gallons hazardous chemical	100 gallons put back into system, 25 gallons speedy dry sent to Union Chemical	No further action

Spill ID	Date	Source	Amount/Product	Remediation	Comments
P-143-1984	5/22/1984	Accident	300 gallons mixed liquids	Sorbents	No further Response Action
P-81-1985	4/9/1985	Accident, physical breakage	200 gallons non-hazardous material	Reuse	No further response action
P-247-1985	9/23/1985	Human error	60 gallons waste oil	Sorbents used, Sawyers Environmental Landfill	No further response action
P-204-1986	6/10/1986	Human error	25 gallons mixed liquids	Excavation	No further response action
P-288-1987	8/20/1987	Tank removal	50 gallons gasoline	Excavated	Aerated and reused in parking lot. No further response action
P478-1991	8/19/1991	Storm damage	200 gallons mixed liquid media	Treatment in place	No further response action
P-430-1999	6/25/1999	Human error - drum	20 gallons non-hazardous chemical	Prime Tanning arranged disposal	No further response action
P-332-2003	5/5/2003	Oil incident, mechanical failure	20 gallons hydraulic oil from trash compactor hose. Impacts to pavement, contained through the use of sorbents.	Sorbents used, managed in the facility waste plan	No further response action
P-72-2004	1/21/2004	drum of leather finishing product punctured by fork lift. Some released to building, some product spilled outside.	15-20 gallons	Speedy dry used to remediate	No further action required

Spill ID	Date	Source	Amount/Product	Remediation	Comments
P-538-2004	7/5/2004	5-gal pail of roofing adhesive fell off roof during repairs. Impacts to interior concrete floor	5-gallon adhesive	Material allowed to cure, and was removed.	No further action required
P-982-2004	10/28/2004	2.5 gallons of Eukesolara Orange spilled interior of plant	Leather dye	Mopped up and placed in drum for off-site hazardous waste disposal	No further action required
P-226-2005	3/25/2005	Failed seal on reservoir of equipment	2 gallons hydraulic oil	Speedy dry and pads	No further action required
P-541-2005	6/26/2005	Flood event	90 gallons tanning chemicals	Due to flood, material not recoverable	No further action required
P-564-2005	7/19/2005	Equipment move	2 gallons hydraulic oil	Speedy dry	No further action required
P-642-2005	8/11/2005	Drum spill inside building	25 gallons tanning chemicals	Sorbent material	No further action required
P-104-2006	2/9/2006	Equipment failure inside facility	1 gallon heat transfer oil	Speedy Dry	No further action required
P-187-2006	3/17/2006	Equipment failure inside facility	10 gallons of hydraulic oil. Approximately one gallon ran into storm drain which leads to WWTP	Speedy Dry	No further action required

A figure showing the location of spills reported at the facility is included in Appendix D. Based on status, in ENSR's opinion, these spills are considered HRECs.

According to the EDR report, the facility maintains a 21,390-gallon #2 fuel oil AST, a 183,043-gallon #6 fuel oil AST, a 76,500-gallon liquid propane AST, a 140,000 calcium oxide AST, a 63,936-gallon formic acid AST, and a 64,200-gallon aluminum chloride AST. ENSR compared the quantities of chemicals listed in the EDR report to a list of ASTs maintained by the facility. The information provided in the EDR report does not appear to be correct based on the lists provided to ENSR and ENSR's observations.

According to the facility records, they maintain a 3,000-gallon fuel oil AST at the Blue Stock warehouse, two #6 fuel oil ASTs totaling 22,720-gallons at the Main Plant, a 5,000-gallon empty AST which formerly contained mineral spirits, a 5,000-gallon formic acid AST, two 10,500-gallon aluminum chloride ASTs, a 275-gallon kerosene AST, and a propane tank. In addition, a tank farm is located inside of the building which houses eight 3,000-gallon, one 4,500-gallon, and ten 2,500-gallon ASTs containing tanning chemicals. Details regarding the ASTs are discussed in Section 6.5. A listing of chemical storage tanks is provided in Appendix E.

The facility files Tier 2 reports as required under the Emergency Planning and Community Right to Know (EPCRA). The chemicals included in the Tier 2 report include #2 fuel oil (max amount 21,390-gal), #6 fuel oil (max amount 183,043 gallons), liquid propane (max amount 76,500-gallons), calcium oxide (max amount 140,000 gallons), formic acid (max amount 63,936 gallons), and aluminum chloride solution (max amount 119,840-gallons). According to the site contacts, a Spill Prevention and Counter Control (SPCC) plan has been prepared and kept on-file at the facility for the chemicals stored in ASTs at the subject property.

The subject property is identified on the AIRS database for air emissions consisting of NH3, CO, NO2, PM10, PM2.5, SO2, VOCs and lead. According to the site contact, the air permit was effective as of January 2007 and expires in January 2011. The facility was cited for a violation with regard to the air permit in 2006. According to the site contact, the violation was associated with the hazardous air pollutants (HAPs) emissions. Glycol Ether EP was delisted from reporting; however Glycol Ether PE, which is more widely used and less of a health issue, according to the site contact, was not. There apparently was a glitch in the system that tracks the chemicals and as a result it appeared that the facility exceeded the Maximum Achievable Control Technology Contaminant (MACT) limit for glycol ether. This incident was remediated by switching the glycol ether used at the facility.

The facility is identified as a UST site. A summary of the USTs listed in the EDR report is provided below.

Date installed	Date removed	Size/Contents
7/1/78	8/1/87	1,000-gallon unleaded gasoline
7/1/78	8/1/87	8,000-gallon diesel
10/1/69	9/1/86	500-gallon #2 fuel oil
10/1/69	7/28/94	250-gallon #2 fuel oil
10/1/69	7/1/94	1,000-gallon #2 fuel oil
10/1/69	11/1/90	1,000-gallon #2 fuel oil (identified as single residence)

Neither the facility nor the Berwick Fire Department has records pertaining to the tank removals. Ron Allard of Prime spoke with the ME DEP and was told that based on the removal dates, if files exist for the tank removals, they would be archived. According to Mr. Allard, he was unaware of any USTs located at the Main Plant and thought that these USTs were likely associated with residential parcels purchased by Prime. The locations of the former USTs are not known. There are currently no USTs located at the subject property.

According to Chapter 691 of the Rules for Underground Storage Tank Facilities, Section 11(A)(d), a site assessment is required to be completed during a tank removal unless the tank is used for consumptive

purposes for heating oil and less than 1,000-gallons. Site assessments are not required for #2 fuel, kerosene or other heating oils.

The subject property was also identified on the FINDS, RCRA-LQG, and TRIS databases. The FINDS listing is associated with the subject property being identified on other databases. Several violations were noted under the RCRA listing which are identified as achieved compliance status. A monetary fine was imposed in May 1988.

The LUST listing was associated with the removal of a gasoline UST (discussed above under spills P-288-1987). The status of the spill incident was no further action required; therefore, this former LUST is considered an HREC.

Cumberland Farms, located at 25 School Street, approximately 200 feet east-northeast of the Main Plant is listed as a LUST site. According to the Maine DEP Hazardous and Oil Spill System Online Reports, faulty equipment was encountered, no release had occurred and no further action was necessary. Based on the lack of release, this LUST is not considered an REC.

4.2 Additional environmental records

Per Section 8.2.2 of the ASTM standard, local and/or additional state or tribal sources of environmental records shall be reviewed to enhance and supplement the ASTM-required federal and state records reviewed and discussed in Section 4.1 of this report. These additional records/sources may include local records such as: lists of waste disposal sites; brownfields sites; lists of hazardous waste/contaminated sites; lists of registered storage tanks; local land records (for activity and use limitations); records of emergency release reports; and records of contaminated public wells. Local sources that may be contacted to obtain this information include: Department of Health/Environmental Division; Fire Department; Planning Department; Building Permit/Inspection Department; Local/Regional Pollution Control Agency, Local/Regional Water Quality Agency, and Local Electric Utility Companies (for records relating to PCBs).

The subject property was not located on or within one mile of tribal lands. As a result, tribal records were not researched as a part of this assessment.

Per the ASTM Standard, approximate minimum search distances for additional records sources should not be less than those specified for standard records sources, but can be adjusted at the discretion of the environmental professional. Based on ENSR's observations during the site visit and information provided in the EDR report, additional state and local records not included within the EDR report were reviewed on-line at the MEDEP for the subject property and nearby for a spill incident and on-line at the NH Department of Environmental Services (NHDES) with regard to ALLSITES listings and Brownfield listings for off-site properties. Information obtained during these record reviews has been incorporated as appropriate throughout the report.

A table documenting the departments contacted to request environmental information relative to the subject property and surrounding sites is included in Section 9. These inquires may have been made in the form of telephone interviews, Freedom of Information Act (FOIA) requests, and/or in-person discussions. The results of these inquiries are summarized in the following table:

Record source	Type of records	Comments
Federal		
US EPA ECHO database (on-line)	Environmental compliance history of subject property.	August 21, 2007: The subject property was listed in the ECHO database as having requirements under RCRA, Toxic Release Inventory (TRIS), AIRS/AFS, Clean Air Act

Record source	Type of records	Comments
		(CAA), Clean Water Act (CWA), and EP313 (Sara Title 3). According to the online information, the subject property is currently in compliance with these requirements. However, the facility did receive a violation in 2005 with a monetary fine of \$51,000 which has since been rectified (discussed above with regard to HAPs).
U.S. EPA Envirofacts Database (online)	Lists and provides information concerning facility activities subject to federal permitting requirements.	August 21, 2007: Same listings as the ECHO database. The subject property is listed as being in compliance.
Local		
Town of Berwick Assessors	Records of building permit and building plan information as well as ownership information and assessor maps.	August 27, 2007: ENSR reviewed Assessors' records at the Town Hall. Pertinent historical use information has been incorporated as appropriate throughout the report.
Berwick Sewer District	Information pertaining to compliance monitoring and connection to sewer.	August 27, 2007: Sewer Department indicated that majority of waste water they receive is from the subject property. Information obtained from the Sewer Department has been incorporated in the report.
Berwick Water Department	Water connection date and municipal water supply.	Information obtained from the Water Department has been incorporated into the report.

4.3 Physical setting information

Based on a review of the U.S. Geological Survey (USGS) topographic map covering the subject property (Somersworth, NH quadrangle), the subject property is located at an elevation approximately 200 feet above mean sea level. The surface topography of the subject property is relatively level with a slight downward slope to the south toward Salmon Falls River.

Although no wet areas are depicted on the topographic map, ENSR observed evidence of wetland-type vegetation (cat tails) in the northern portion of the parking lot (corner of Sullivan and Wilson). In addition, the Assessors' map depicts wet areas in this portion of the subject property. A stream is culverted beneath the Main Plant. The stream can be seen flowing from a culvert, which extends from the southeastern corner of the parking lot north of the Main Facility, under Wilson Street, and entering a culvert, which extends beneath the Main Plant. This stream subsequently discharges south of the subject property to the Salmon Falls River.

According to the EDR report, the southern-most portion of the Main Plant property is located within a 100-year flood zone. The Flood Insurance Rate Map (FIRM) for the subject property (panel # 230144006B), depicts the southeast corner of the Main Plant located in a Zone AE, base flood evaluation determined. Mr. Allard provided ENSR with a letter from the Federal Emergency Management Agency (FEMA) that indicates a portion of the property is located within a special flood hazard area. Mr. Allard had a survey completed which concluded that the buildings were not located in the special hazard area and the FEMA letter confirms this finding.

According to the Simplified Bedrock Geology Map of Maine (USGS), bedrock beneath the subject property is comprised of Upper Ordovician to Silurian-aged marine sandstone and slate in the east grading to gneiss and schist in the southwest.

According to the U.S. Department of Agriculture (USDA) Soil Survey of York County, the surficial soils at the subject property consist Urban land (Main Plant), comprised of moderately well drained soils having a low hydraulic conductivity, Naunburg Soils (Parking Lot), consisting of sand with slow infiltration rates with poorly drained soils, and Croghan Soil (Blue Sort and grassy lot) which have moderate infiltration rates, well drained, and low hydraulic conductivity. Depth to bedrock is estimated to be greater than five feet below ground surface (bgs) and depth to groundwater at the subject property is estimated to be less than 10 feet bgs. Based on ENSR's observations and review of the USGS topographic map, groundwater flow at the site is in a south-southwesterly direction toward Salmon Falls River.

4.4 Historical use information on the subject property

Information pertaining to historical uses of the subject property and was obtained from the following publicly available and readily reviewable sources:

- USGS Topographic Maps for Somersworth, NH/Berwick, ME, dated 1893, 1944, 1958, 1973, and 1998 obtained from EDR (Appendix F)
- Property Deeds provided by Prime
- City Directories (no coverage for the subject property area)
- Sanborn Fire Insurance Maps (no coverage for the subject property area)
- Aerial Photographs (no coverage for the subject property area)
- State and local agency records
- Facility interviews

The table below summarizes the information pertaining to the historic land use of the subject property.

Chronological Historic Site Use			
Prime Tanning Company 20, 29, 34 and 35 Sullivan Street Berwick, Maine			
Date(s)	Type of Document	Description	Level of Concern
1850	Assessor Field Card	On-site Main Plant building constructed	High Concern
1898	Topographic Map	Subject property appears undeveloped	No Concern
1944	Topographic Map	Main Plant is present; however, much smaller than current building. Three residential type buildings are depicted at northern parking lot (34 Sullivan), 29 Sullivan vacant (grassy lot), warehouse building present (35 Sullivan). An intermittent stream is present, which flows in a southerly	High Concern

Chronological Historic Site Use			
Prime Tanning Company 20, 29, 34 and 35 Sullivan Street Berwick, Maine			
Date(s)	Type of Document	Description	Level of Concern
		direction along the eastern side of the parking lot property and eastern side of the warehouse building.	
1958	Topographic Map	Main Plant is present and appears larger than building depicted on 1944 topographic map. The three remaining parcels similar to 1944.	High Concern
1973	Topographic Maps	Main Plant is present and appears larger than 1958 topographic map. Three remaining parcels similar to 1944.	High Concern
1974	Assessor Field Card	Warehouse building constructed at 29 Sullivan.	Low Concern
1995	Assessor Field Card	House burned at 29 Sullivan (grassy lot)	No Concern
1998	Topographic Map	Same as 1973 topographic map	No Concern
2007	Assessor Field Card	Detached garage removed from parking lot (34 Sullivan)	No Concern

According to information obtained from the Prime Tannery website, Morris Kaplan founded the business in 1914 and moved operations from Massachusetts to Berwick in 1934. Based on historical topographic maps, the tannery operations began in an existing building in 1934. According to ENSR's review of the property deeds, Lennox and Nagle Leather Company and LR Hersom & Sons tannery operated on the Main Plant portion of the property during the early 1900s through at least the 1920s. The property containing store houses and the LR Hersom & Sons Tannery was foreclosed on and purchased by Jennie Kaplan (wife of Morris Kaplan) in 1942. According to this deed, a reservoir was owned by HR Hersom & Sons and also transferred. The 1944 Topographic map depicts an intermittent stream running beneath a building in the southern portion of the Main Plant parcel, which may have been used as the reservoir. In 1974, one of the parcels purchased which makes up the Main Plant parcel contained a house, barn, and laundry building. It is not known if dry cleaning was conducted at this laundry building. Several parcels of land were purchased by either the Kaplans or Prime Tanning which contained residential structures, wells, and/or out buildings.

According to Mr. Allard, full tannery operations occurred at the subject property prior to the 1990s. A triangular piece of land bordered by Wilson Street to the north and Sullivan Street to the West contained part of a slaughter house, which references a deed back to 1892, was purchased by Ms. Kaplan in 1948.

The southern portion of the Main Plant was purchased from Bells Hardware in 1977. According to Mr. Allard, this building was demolished circa 1994. A former heating oil UST was associated with this parcel.

In 1962, Prime purchased two parcels of land from Duffy's Oil Company. No additional information pertaining to the use of these parcels was available from sources listed in Section 9.0.

In ENSR's opinion, the historic use of the subject property for tannery operations dating back to the early 1900s is considered a REC. The former use of parcels purchased from Duffy's Oil Company and the former laundry are considered RECs to the potential use of oil and/or hazardous materials (dry cleaning solvents).

According to the Assessors' field card, the Blue Sort building was constructed in 1974. A building which appeared similar to the current building is depicted on the 1944 Topographic map. No additional information pertaining to operations at this building was able to be obtained from sources listed in Section 9.0. In ENSR's opinion, the former potential industrial use of this property is considered a REC.

4.5 Historical use of adjacent sites

The following sources were utilized in research for the historic land uses of adjoining properties:

- USGS Topographic Maps for Somersworth, NH/Berwick, ME, dated 1893, 1944, 1958, 1973, and 1998 obtained from EDR (Appendix F). No Sanborn map, city directory or aerial photograph coverage was available for the subject property area.

The table below summarizes the information pertaining to the historic land use of the properties surrounding the subject property.

Chronological historic use of adjoining properties				
Prime Tanning Company 20, 29, 34 & 35 Sullivan Street Berwick, ME				
Location	Date	Source	Description	Level of Concern
Main Plant				
North	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Wilson Street beyond which are residential structures, school (first appeared on 1958 topographic map), and an automotive repair facility (not identified on any contamination-related database).	No Concern
East	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	The 1944 topographic map depicts residential structures northeast of the Main Plant, School Street, and residential structures beyond. Due to urban nature of the area, structures are not depicted on the 1973 or 1998 topographic maps. ENSR observed residential structures, the Berwick Fire Department east of the Main Plant.	No Concern

<p align="center">Chronological historic use of adjoining properties Prime Tanning Company 20, 29, 34 & 35 Sullivan Street Berwick, ME</p>				
Location	Date	Source	Description	Level of Concern
South	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Berwick Street beyond which are residential-type structures. ENSR observed a gasoline station immediately south beyond Berwick Street which is identified as a SHWS and UST site. Prime has an access easement to this property for their storm water discharge. Southwest is a small strip of stores which is depicted on the topographic maps as a large connected building. This may have been associated with former tannery operations; however, currently occupied by tanning salon, sub shop and offices.	Low Concern
West	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Sullivan Street beyond which are residential structures and Town Hall.	No Concern
Blue Sort Building				
North	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Goodwin Street beyond which are residential type buildings. At the time of ENSR's site inspection, one of the northerly adjacent buildings appeared to be a church.	No Concern
East	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Sullivan Street beyond which are three residential type structures. This is Primes parking lot which no longer contains structures.	No Concern
South	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Jordan Street beyond which is vacant lot. Assessor field card indicates residential dwelling burned in 1995; however, no structure is depicted at this location due to the urban area.	No Concern
West	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Residential structures beyond which is an electrical substation (first appeared on 1958 topographic map)	No Concern

Parking Lot				
North	1944	Topographic Map, site inspection	Residential type buildings along Sullivan Street, wetland and intermittent stream immediately north.	No Concern
	1958, 1973, 1998, 2007	Topographic Map, site inspection	Residential type structures and undeveloped land.	No Concern
East	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Residential type structures and land occupied by the school	No Concern
South	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Wilson Street beyond which is the Main Plant (see description above)	High Concern
West	1944, 1958, 1973, 1998, 2007	Topographic Map, site inspection	Sullivan Street beyond which is a factory style building (Blue Sort)	Moderate Concern
Grassy Lot				
North	1944, 1958, 1973, 1998, 2007	Topographic Map, Site inspection	Jordan Street beyond which is factory style building (Blue Sort)	Moderate Concern
East	1944, 1958, 1973, 1998, 2007	Topographic Map, Site inspection	Sullivan Street beyond which is Main Plant (see description above)	High Concern
South	1944, 1958, 1973, 1998, 2007	Topographic Map, Site inspection	Residential style buildings on 1944. Due to urban nature, no structures are depicted south or west. Based on ENSR site inspection, properties are residential	No Concern
West	1944, 1958, 1973, 1998, 2007	Topographic Map, Site inspection	Residential style buildings on 1944. Due to urban nature, no structures are depicted south or west. Based on ENSR site inspection, properties are residential	No Concern

4.6 Previous environmental reports

No previous environmental reports were forwarded to ENSR. According to Mr. Allard, no previous Phase I environmental assessments have been prepared for the subject property.

5.0 Interviews

5.1 Interview with current subject property owner

During the ESA activities, ENSR interviewed Mr. Ron Allard, Engineering and Regulatory Compliance Director for Prime Tanning Company, who provided current and historical use of the property. Information obtained during the interview process has been incorporated as appropriate throughout the report.

5.2 Interview with past owners, operators, and occupants

Per ASTM, interviews of past owners, operators, and occupants of the subject property, who are likely to have material information regarding the potential for contamination at the subject property, shall be conducted to the extent that they can be identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. ENSR obtained historical site information from site representatives and the sources listed in Section 9.0. According to information obtained, tanning operations have operated at the subject property since the early 1900s under Lennox and Nagle Leather Company, LR Hersom & Sons Tannery. Morris Kaplan (deceased) moved tanning operations from Massachusetts to Berwick in 1934 and Prime Tanning has been present at the subject property since that time. Thus, based on the use of the subject property and surrounding area, and because many of the past owners are not likely to be living, past owners were not contacted. This data gap does not represent a significant limitation to this investigation, in ENSR's opinion.

5.3 Interview with site manager

ENSR interviewed Mr. Ron Allard of the subject property. Information obtained during the interview process has been incorporated, as appropriate, throughout the report.

5.4 Interviews with government agencies

Interviews with local government agencies were conducted in conjunction with the review of additional regulatory records. Information obtained through these interviews is primarily discussed in Section 4.2, as well as other pertinent areas of this report.

6.0 Site reconnaissance

6.1 Methodology

Ms. Cheryl A. Cormier, PG, ENSR Geologist, conducted a site reconnaissance of accessible areas of the subject property on August 27, 2007. ENSR's objectives were to visually inspect the area for potential evidence of site contamination and the presence of hazardous or regulated substances. ENSR accomplished these objectives through a site inspection (visual observation), interviews, and record reviews.

6.2 Hazardous materials use/storage

A summary of oil and/or hazardous materials (OHM) stored at the subject property is included in Appendix E. In addition to the bulk storage areas, smaller quantities of tanning chemicals, pigments, paints, stains and liquors are placed into drums and/or smaller containers, placed on carts and are located throughout the facility at the appropriate mills.

At the time of the site inspection, the chemical storage/receiving area consisted of approximately two pallets of dry BayChem (retanning), approximately 30 drums of tanning agents (Chemtan, Densodrin), and approximately eight 200-gallon totes of color chemicals. These materials were stored on either a concrete floor or steel shelves. No staining or floor drains were observed in the vicinity of the chemical storage area and the concrete floor appeared to be in good condition.

ENSR observed approximately 30 drums of pigments in the dye room. Access to this room was not provided however it was possible to view the room from the door window. According to Mr. Allard, no floor drains are present in this room. ENSR was unable to assess the condition of the floor around the drums; however, the walkway appeared to be in good condition.

Approximately 50 55-gallon drums of finishing chemicals (glycol ether EB and glycol ether EP) were observed stored on concrete in a room where the threshold had been raised to form a berm. No floor drains were observed in this area. The visible areas of the floor did not appear to be stained and in good condition.

Small quantities of paints and dyes were observed in R&D areas. These materials were in one-gallon plastic containers and/or five gallon pails and stored on shelves and/or the concrete floor. No significant staining was observed in the R&D areas. The concrete floor in these areas appeared to be in fair to good condition.

Powder batching is prepared in the dry weigh area. ENSR observed several pallets of dry tanning agents which are broken down for production volume, placed on a cart, and transported to the appropriate mill. No floor drains were observed in this area. The floor was covered with powder tanning agents. The room is vented and persons mixing the powders are required to wear a respirator due to the dust.

Flame-resistant cabinets are located throughout the facility, which are used to store small quantities of paints and thinners.

Formic acid, which is used in the coloring process is dispensed beneath a fume hood at the Main Plant.

The tank farm inside the building houses 19 2,500 gallon to 4,500-gallon ASTs containing tanning chemicals (Wattle, DX-902, Mardan 20, SMS, T-15, 1084, Biosoft 680, Mardan 20 and Relugan RE). The location of the tank farm is depicted on Figure 2B. Material from these tanks is dispensed into smaller units to be used at the mills. A floor trench with valve is present in the tank farm room for secondary containment as well as an overflow tank in the event a tank is overfilled. The valve allows the facility to close off discharge of the floor trench which is expected to discharge to the on-site pre-treatment facility. This valve remains locked at all

times according to Mr. Allard. Evidence of overflows from the tanks was observed on the sides of the tanks and on the floor around the tanks in this area.

The chemical storage room contained approximately 100 gallons of tanning/finishing chemicals. The room was of concrete block construction with a sloped floor. No drains or significant staining were observed in this room.

Two drums of phosphoric acid are located within the neutralization plant and are used to adjust the pH of the waste water. Aluminum chloride, stored in two ASTs at the neutralization plant are used as a flocculant or coagulating agent for the waste water treatment. Information pertaining to ASTs is discussed in further detail in Section 6.0.

The mixing room contains up to 40 drums of various oils and finishes. The drums are transported from the chemical storage area to the mixing area. No floor drains are located within the mixing area.

ENSR observed four 55-gallon drums (3 empty) labeled gear oil adjacent to the boiler in the boiler room of the Main Plant. No floor drains or staining were observed associated with the drums.

According to the facility records, up to three 55-gallon drums of leather finish oils are present on the second floor of the Main Plant. ENSR did not observe these drums at the time of the assessment.

According to Mr. Allard, no floor drains are present in chemical storage areas in the Main Plant and floors in chemical storage areas at the Main Plant are sloped at the doorway to act as a berm.

ENSR observed a used oil containment area in western portion of the Blue Sort building. At the time of the assessment, one five-gallon container was being filled with used oil. A funnel was present on the container. This area was equipped with containment pallets and the floor around the pallets appeared to be stained with oil. Sorbent pads were on the floor to pick up spilled oil. The concrete floor in this area appeared to be in fair to good shape.

6.3 Hazardous/Solid waste

Hazardous/solid waste streams generated at the subject site include the following:

- Regulated wastes (waste finishes, solvents, paints, managed off-site by Ashland Chemical);
- Domestic paper waste (non-hazardous; managed off-site by Waste Management);
- Used oil, oily rags, oil-impacted sorbent material (managed off-site by Ashland Chemical);
- Spent fluorescent lamps (universal waste; managed off-site by Waste Management);
- General refuse which includes occasional very small volumes of spent aerosol containers that are reportedly "RCRA-empty" (non-hazardous; managed off-site by Waste Management);
- Waste shaving dust (non-hazardous, bailed and managed off-site by Waste Management);
- Bag house waste (managed off-site by Waste Management);
- Leather scraps throughout facility and collected at pre-treatment plant (managed off-site by Waste Management); and,
- Citrus-based solvent associated with parts cleaner in Main Plant (managed by outside contractor).

Waste materials are generally containerized on-site to minimize potential releases. Based upon ENSR's observations, waste materials were observed in dedicated areas labeled as hazardous waste. The drums located in these areas appeared to be labeled properly; however, as a compliance inspection was not part of

this investigation, ENSR did not inspect all of the drums. ENSR observed oil staining on the concrete floor in the Blue Sort building where oily wastes were stored. The floor appeared to be in good condition at the time of the site inspection.

The hazardous waste storage area observed in the Main Plant contained 14 55-gallon drums of waste oil, grease and rags, approximately 20 55-gallon drums of oil and resins, eight 55-gallon drums of lube oil and gear oil, and one drum of waste finishes. One 55-gallon drum of universal waste (light ballasts) and a battery were observed in this area. No floor drains were observed in the vicinity of the drums, and drums were equipped with secondary containment.

According to the EDR database and information provided by the site contact, the facility has the US EPA generator identification number MED001096395 and is listed as a large quantity generator.

Solid waste receptacles were observed along the eastern side of the Main Plant and western side of the blue Sort building. Two of the receptacles at the Main Plant appeared to contain metal and/or wood scraps. A roll off container observed east of the loading area and the compactor located west of the Blue Sort building appeared to be used to for domestic wastes. No staining was observed associated with the trash receptacles at the time of the site inspection.

6.4 Underground storage tanks (USTs)

Information pertaining to USTs was discussed in Section 4.0. Currently no USTs are located on-site. The facility was not able to provide UST closure reports. A copy of the MEDEP UST listing was provided by the site contact. According to MEDEP personnel, closure reports would not have been prepared unless evidence of a release had been detected and, at the time that the diesel fuel UST was removed, site assessments were not required. In ENSR's opinion, the former fuel oil and diesel USTs are considered a REC based on a lack of post-closure analytical testing.

6.5 Aboveground storage tanks (ASTs)

A steel 3,000-gallon #2 fuel oil AST is located on the northern side of the Blue Stock warehouse. The tank is enclosed in concrete. A pump and hose are located within the concrete enclosure in the event that water infiltrates the containment, facility people can manually pump the water. No drains, sumps or stains were observed associated with this AST.

Two #6 fuel oil double-lined ASTs, totaling 22,720-gallons, are located along the northwestern side of the Main Plant. The tanks are equipped with interstitial monitoring and the building is bermed. These ASTs are located in the boiler house which has concrete walls and a concrete floor. No significant oil staining was observed associated with the ASTs, and no staining was observed in the paved parking areas outside of the ASTs. In addition, ENSR observed water in the storm drains near the ASTs and no oily sheen was observed.

A 275-gallon kerosene AST is located adjacent to the boiler room. ENSR did not observe this tank at the time of the site inspection; however, there have been no reported issues with this AST.

A 5,000-gallon empty AST, which formerly contained mineral spirits is located in an open shed in the southwestern portion of the Main Plant. No staining was observed associated with the AST. According to the site contact, use of mineral spirits was discontinued in the 1990s.

A 5,000-gallon plastic formic acid AST is located on the eastern side of the Main Plant. This tank is equipped with secondary containment. No staining was observed associated with this AST.

A propane tank which is enclosed with a chain link fence, is located in the southeastern portion of the Main Plant.

One 5,500-gallon and one 5,000-gallon AST, both of poly construction in concrete containment, containing aluminum chloride are located adjacent to the neutralization plant in the eastern portion of the Main Plant. No staining was observed associated with these tanks. An approximate 180,000-gallon process water equalization tank is located at the pre-treatment facility at the Main Plant. This tank is not equipped with secondary containment. No stains were observed associated with this AST. In addition, a 70 pound lime silo (formerly calcium oxide) is located within the pre-treatment building which is used in the neutralization of the waste water. White powder was observed on the walls and on the floor near the lime silo.

A tank farm, which is located inside the Main Plant, houses several single walled fiberglass ASTs. These tanks contain tanning chemicals (wattle, DX-902, Mardan 20, SMS, T-15, 1084, Biosoft, and Relugan RE). There are eight 3,000-gallon, one 4,500-gallon, and ten 2,500-gallon ASTs in this area. An overflow tank is located in the tank farm which is designed to hold any overflow of tanning chemicals which may occur during deliveries. The floor in the tank farm area was stained with some tanning chemicals. A floor trench is present in this area for spill containment.

A listing of chemical storage tanks is provided in Appendix E.

6.6 Polychlorinated biphenyls (PCBs)

For informational purposes, PCB-containing dielectric fluids have been widely used as coolants and lubricants in transformers, capacitors, and other electric equipment due to their insulating and nonflammable properties. Based on the age of the subject facility, the potential is low for PCBs to be present on site.

6.6.1 Transformers

During the site visit, ENSR observed a main transformer on the east side of the Main plant, and a pad mounted transformer on the northern side of the Main Plant. According to the site contact, the transformers are owned and maintained by Central Maine Power. No leaks or staining were observed associated with the transformers. Based on the age of the buildings, it is possible that the main transformers located on the east side of the Main Plant may contain PCBs.

6.6.2 Fluorescent light ballasts

Fluorescent light ballasts contain capacitors that may be filled with PCB-containing dielectric fluid. Typically, newer light ballasts will contain labeling stating "No PCBs". ENSR observed that some light ballasts had been changed out at the facility. Based upon the age of the subject facility, there is a potential that the light ballasts at the subject property contain PCBs. An inspection of individual ballasts was not included within the scope of this assessment.

6.6.3 Hydraulic equipment

PCBs have also historically been associated with hydraulic oils. According to information obtained from the site contact, many of the pieces of equipment used at the subject property are hydraulic. The equipment is repaired on-site and any oil removed during repairs is drummed pending disposal. According to the site contact, equipment with PCB-containing oil are no longer used at the facility.

Oil filled heat transfer equipment is currently used on the property. It is not likely that oil used in the current equipment contains PCBs; however, it is likely that historical heat transfer equipment used oils which contained PCBs.

6.7 Water

6.7.1 Potable water

Potable and process water is provided by the Town of Berwick. The water supply for the Town of Berwick is the Salmon Falls River, located approximately 400 feet south of the subject property. Prime has an easement at the southerly adjacent gasoline station for water intake for the subject property. The Berwick Water Department relies exclusively on surface water, and runs a Class IV water treatment plant at 150 Rochester Street.

Historical deeds document wells on some of the parcels reviewed. ENSR did not observe evidence of drinking water wells on the subject property.

6.7.2 Wastewater

The Town of Berwick Sewer District (BSD) provides municipal sewer to the site. The BSD was built during the late 1960s early 1970s and the subject property connected to the sewer system in the early 1970s. Prior to that time, it is likely that effluent was either discharged directly to the river, or septic systems were located on the subject property. No evidence of former septic systems was observed at the time of the site walkover.

The BSD requires the facility to sample monthly for ammonia, BOD, trivalent chromium, copper, lead, oil and grease, phosphate, silver, and total suspended solids (TSS). Additionally, the facility must monitor pH and flow continuously. A representative at the BSD indicated that it's difficult to pin point violations; however, if a violation is noted, a Notice of Violation is issued and fines imposed. The representative further stated that in most cases the issues are associated with temporary problems.

Wastewater discharges at the subject site include:

- Effluent from human consumptive use;
- Process water;
- Floor drains; and
- Some roof drains.

Effluent is discharged into the on-site wastewater treatment system, and subsequently to the municipal sewer system. The subject property maintains an Industrial User Permit (#005), which expires in April 2010.

Effluent enters the treatment system and is initially screened to remove scraps of leather. The water enters an equalizer tank. The water is re circulated in a holding tank and tested every two hours. Lime is used to reduce acidity (pH), aluminum chloride is used as a flocculant, polymers are added as needed, then the water is gravity fed to the adjacent town pumping tank. According to the site contact, approximately 200,000-gallons of process water are generated per-day. The solids from the screen are disposed as a non-hazardous waste by Waste Management.

According to Mr. Allard, the BSD tests for dioxins as tanneries as well as paper mills were placed in a dioxin monitoring program. Although the dioxin test results have been below levels of concern, the facility has not been able to get out of the dioxin monitoring program, according to Mr. Allard.

6.7.3 Storm water

Storm water either sheet flows and infiltrates the ground surface and/or enters storm drains. Storm water drains were observed throughout paved areas of the subject property and along the streets surrounding the subject property. Storm drains discharge to the municipal storm sewer system.

Storm water drains located at shipping/receiving docks are equipped with valves which are locked out during deliveries to prevent a release to the storm sewer system.

The facility has not had to conduct storm water testing over the past 10 years. According to the Permit Compliance Database reviewed on-line, NPDES permit # MEP250082 was issued to the facility and no permitted discharge data was available for this facility.

6.7.4 Surface staining/Stressed vegetation/Debris

ENSR observed concrete floors in the Main Plant to be discolored and/or stained which appeared to be associated with years of manufacturing. The floors in a large portion of the Main Plant were observed to be in poor to fair condition. In addition, oil staining was observed near the oil containment area in the Blue Sort building on the concrete floor, however, the floor appeared to be in fair to good condition. No stressed vegetation or debris were noted during the site inspection activities.

7.0 Findings and opinions

ENSR performed an ESA of the Prime Tanning Company, located at 20, 29, 34 & 35 Sullivan Street in Berwick, York County, Maine, in conformance with the scope and limitations of ASTM Practice E 1527-05, which meets the requirements of 40 CFR Part 312 and is intended to constitute *all appropriate inquiry* for purposes of the landowner liability protections (LLPs). No physical environmental sampling was performed. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. Additional services included in this ESA are described in Section 1.2 of this report.

Per the ASTM standard, potential findings can include recognized environmental conditions (RECs), including historical RECs (HRECs) and de minimis conditions. A REC means the presence or likely presence of any hazardous substances or petroleum products on a site under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the site or into the ground, groundwater or surface water of the site. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. HRECs are generally conditions that in the past have been remediated to the satisfaction of the responsible regulatory agency. De minimis conditions are those situations that do not present a material risk of harm to public health or the environment and generally would not be subject to enforcement action if brought to the attention of the regulating authority.

7.1 RECs

The following RECs were identified:

- **Former Tanning Operations:** Based on historical information reviewed, the Main Plant building was constructed in 1850 and operated as a tannery since circa 1910. Historical storage and use of oil and/or hazardous materials is unknown. According to Mr. Allard, full tannery operations occurred at the subject property prior to the 1990s. Historical deeds document a former slaughter house on a parcel purchased by the tannery. In ENSR's opinion, former tanning operations which likely included the use and disposal of oils, solvents, chromium solutions, and wastewater) and the potential burial of tannery wastes (hair and/or hides) on the subject property are RECs.
- **Former Site Uses:** According to deeds researched, two parcels were purchased in the 1960s from Duffy's Oil Company and a parcel was purchased, which contained a laundry building. The former uses of these properties could not be verified. In ENSR's opinion, there is a potential that oil and dry cleaning chemicals were associated with these parcels which is considered a REC.
- **Former USTs:** Four fuel oil, one diesel and one unleaded gasoline USTs were removed from the subject property. Based on the sizes of the fuel oil USTs (250-gallons to 1,000-gallons), and the likelihood that these USTs were used for consumptive use, closure assessments would not have been required to be completed upon removal of these USTs, according to Chapter 691 Rules for UST Facilities (Section 11(A)(d)). One spill incident regarding the gasoline UST has been closed by the MEDEP. However, no information was available regarding the removal of the fuel oil or diesel USTs. According to MEDEP personnel, closure reports would not have been prepared unless evidence of a release had been detected and, at the time that the diesel fuel UST was removed, site assessments were not required. In ENSR's opinion, the former fuel oil and diesel USTs are considered a REC.
- **Former Blue Sort Building:** According to the Assessors' field card, the Blue Sort building was constructed in 1974. A building which appeared similar to the current building is depicted on the 1944 Topographic map. No additional information pertaining to operations at this building was able to be obtained. In ENSR's opinion, the former potential industrial use of this property is considered a REC.

- **Septic/Sewer:** Based on information obtained, the subject property was connected to municipal sewer during the 1970s. Prior to that time, it is likely that residential properties that were formerly located at the Main Plant, grassy lot, parking lot and possibly the Blue Sort building maintained private septic systems. According to the site contact it is likely that process water waste and sanitary sewer from the Main Plant and possibly the Blue Sort building discharged directly to the Salmon Falls River. In ENSR's opinion, the former discharge of process water and sanitary wastes directly to the river and the potential use of a septic system at the Blue Sort building are considered RECs.

7.2 HRECs

Eighteen spill incidents were reported for the subject property, which have no further action required status. As such each of these spill incidents are considered HRECs.

7.3 De minimis

No de minimis conditions were identified in association with the subject property.

7.4 Data Failures/Data Gaps

ENSR's ESA identified the following data failures/gaps:

- Per ASTM, interviews of past owners, operators, and occupants of the subject property, who are likely to have material information regarding the potential for contamination at the subject property, shall be conducted to the extent that they can be identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. ENSR obtained historical site information from site representatives and review of historical documents. According to the sources researched as part of this investigation, the subject property has been occupied by tannery operations since circa 1910, with Morris Kaplan moving his tanning operations from Massachusetts to the Berwick facility in 1934. Thus, based on the use of the subject property and surrounding area, and the likelihood that past owners of the subject property are no longer living, past owners were not contacted. This data gap does not represent a significant limitation to this investigation, in ENSR's opinion.
- FOIA request information has not been received from all external data sources contacted. This represents an ASTM data failure. ENSR contacted MEDEP and requested a review of archived files. At the time of the issuance of this report the files have not been received. In addition, ENSR contact the Berwick Historian and no response has been received as of the time of this report.
- Per ASTM, local, and/or additional state or tribal environmental records sources shall be reviewed to enhance and supplement the ASTM-required federal and state standard records sources. Note that EDR also includes selected local, and/or additional state or tribal records within its search. Per the ASTM Standard, approximate minimum search distances for additional records sources should not be less than those specified for standard records sources, but can be adjusted at the discretion of the environmental professional based on 1) the density of the setting in which the property is located; 2) the distance that the hazardous substances or petroleum products are likely to migrate based on local geologic or hydrogeologic conditions; 3) the property type; 4) existing or past uses of surrounding properties; and 5) other reasonable factors. Based on ENSR's observations during the site visit and information provided in the EDR report, no significant environmental concerns were identified associated with the adjacent properties; thus, additional state and local records not included within the EDR report were reviewed for the subject site only. This data gap is not expected to represent a significant limitation to this investigation.
- Not all areas of the floors within the building were able to be inspected due to equipment and chemical storage. Therefore, areas of staining above and beyond what was observed in areas inspected could not be assessed. This data gap is not expected to represent a significant limitation to this investigation.

8.0 Conclusions and Recommendations

ENSR performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Prime Tanning Company, located at 20, 29, 34 and 35 Sullivan Street in Berwick, Somerset County, ME. Any exceptions to, or deletions from, this practice are described in Section 1 of this report. Data failures are presented in Section 7.4. This assessment revealed evidence of RECs in connection with the subject property.

ENSR recommends obtaining archived files regarding the former USTs in order to evaluate if soil sampling was conducted upon removal of the USTs, specifically the 8,000-gallon diesel UST which, under Chapter 691 Rules for UST Facilities, Section 11 (A)(d) would have required a site assessment be conducted upon removal of the UST.

ENSR further recommends conducting a subsurface investigation at the subject property to evaluate if soil and/or groundwater have been negatively impacted by historical on-site operations of the tannery, laundry facility and former oil company and to address a potential septic system at the Blue Sort building. ENSR further recommends testing of sediment at the outfall in order to address historic process water discharges to the river.

9.0 References and contacts

9.1 Persons interviewed

Allard, Ron, Engineering, Prime Tanning Company, July through September 2007.

Berwick Assessing Department personnel, August 27, 2007.

Berwick Fire Department, July 5, 2007 and August 27, 2007.

Berwick Historical Society, September 10, 2007.

Berwick Sewer District, Dave, 207-698-5740, September 6, 2007.

Berwick Water Department, Chris Weismann, July 3, 2007.

9.2 Reports and documents reviewed

Aerial photograph, Google Earth, September 2007.

Environmental Data Resources, Inc., Aerial Photograph Report (no coverage), 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488, dated July 3, 2007.

Environmental Data Resources, Inc., City Directory Report (no coverage), 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488 dated July 5, 2007.

Environmental Data Resources, Inc., Environmental Lien Search, 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488, dated July 6, 2007.

Environmental Data Resources, Inc., EDR Historical Topographic Map Report, 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488, dated July 3, 2007.

Environmental Data Resources, Inc., The EDR Radius Map with GeoCheck Report, 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488, dated July 3, 2007. Provided by EDR, 440 Wheelers Farms Road, Milford, CT 06461, (800) 352-0050.

Environmental Data Resources, Inc., Sanborn® Map Report, (no coverage), 20 Sullivan Street, Berwick, ME, Inquiry Number: 1970488, dated July 3, 2007.

New Hampshire Department of Environmental Services, One Stop database, <http://www.des.state.nh.us>

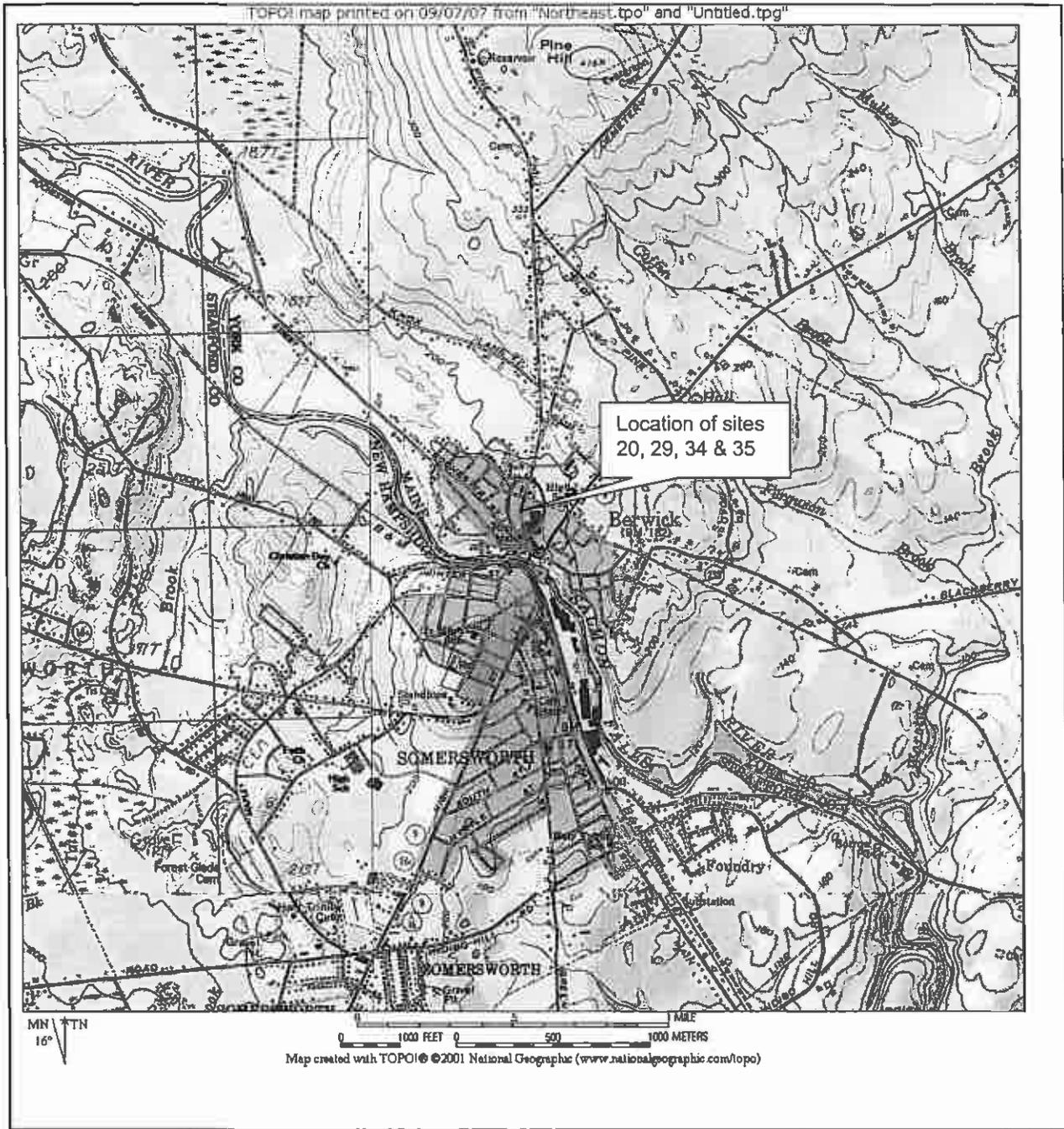
Maine Department of Environmental Protection, Chapter 691 Rules for Underground Storage Tank Facilities, September 10, 2007.

Maine Department of Environmental Protection, Bureau of Remediation and Waste Management, Hazardous and Oil Spill System, www.maine.gov/dep/rwm/hoss/report, July 5, 2007.

United States Environmental Protection Agency, Enforcement & Compliance History Online (ECHO), August 21, 2007.

United States Environmental Protection Agency, Envirofacts Database Online, August 21, 2007.

Figures



 <p>Somersworth, ME 1998</p>	<p>Prime Tanning Company 20, 29, 34 & 35 Sullivan Street Berwick, ME</p>	<p>Site Locus</p> <p>September 2007 Job No. 12159-001-100</p>	<p>Figure 1</p> <p>www.ensr.aecom.com</p>
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NOTE:
ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
SOURCE:
- BERWICK ME ASSESSOR'S
- ENSR SITE VISIT 8/27/07

PARKING LOT
FOR PRIME
TANNING

LEGEND
- - - - - SITE BOUNDARY



FIGURE NUMBER	2C
SECRET NUMBER	1

SITE PLAN
PRIME TANNING COMPANY
35 SULLIVAN STREET
BERWICK, ME

SCALE	1" = 25'
DATE	9/07
PROJECT NUMBER	12589-001-100

ENSR CORPORATION
2 TECHNOLOGY PARK DRIVE
WESTPORT, MASSACHUSETTS 01886
PHONE (978) 589-3100
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INSR

REVISIONS	NO.	DESCRIPTION	DATE	BY
	X			
DESIGN BY				
DRAWN BY				
K.P.B.				
CHECKED BY				
C.C.				
APPROVED BY				
C.C.				

