

**PHASE I ENVIRONMENTAL SITE ASSESSMENT  
FORMER PRIME TANNING COMPANY  
20, 29, 34, AND 35 SULLIVAN STREET  
BERWICK, MAINE**

**DRAFT**

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## EXECUTIVE SUMMARY

The following report presents the findings of a Phase I Environmental Site Assessment (ESA) performed by Ransom Environmental Consultants, Inc. (Ransom) for the property referred to as the Prime Tanning Company in the Town of Berwick, York County, Maine (the "Subject Property"). The Subject Property consists of four parcels of land identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively. This Phase I ESA was conducted in general accordance with the requirements provided by the American Society for Testing and Materials International Designation: E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2005* (ASTM Standard Practice) and Ransom's Master Services Agreement with Southern Maine Regional Planning Commission (SMRPC), dated March 18, 2009. The purpose of this Phase I ESA was to evaluate the environmental conditions of the Subject Property for evidence of a release or threat of release of oil or hazardous materials (OHM), and to provide our professional opinion regarding evidence of recognized environmental conditions (RECs) in connection with the Subject Property.

The Subject Property encompasses a total of approximately 11.4 acres and is developed with a former leather tanning and processing complex, which includes the main facility, the former Blue Sort Building, paved driveway and parking areas, overgrown vegetation and grass areas, and wooded areas. Manufacturing operations ceased at the Prime Tanning facility in 2008, and the site has been unoccupied since that time.

The main facility building, located on Lot 146, encompasses a footprint of approximately 248,800 square feet. The facility was constructed in several phases over time, and is generally constructed of concrete block walls and concrete slab or wooden floors. The majority of the main facility consists of two stories. The remainder of the parcel consists of paved and gravel driveway/parking areas and grass areas.

The former Blue Sort Building located on Lot 130 is a one-story warehouse and encompasses approximately 14,341 square feet. The warehouse building has a concrete slab-on-grade foundation and a steel frame. The former paved employee parking lot is located in the southern portion of Lot 133. Lot 95 currently consists of an unimproved grass lot.

Historical sources indicate that the main facility parcel (Lot 146) has been occupied by a tannery since prior to 1877. Other historical occupants of the Subject Property identified during this assessment include a wool pulling works facility, a sash and door manufactory, a reed manufactory, a carriage manufactory, an oil company, a laundry facility, a shoe factory, and a lumber company.

Former operations performed at the Prime Tanning Facility involved the tanning and processing of leather. Previously treated hides, referred to as "blue stock hides" were delivered to the former Blue Sort Building where sorting, splitting, and shaving activities were conducted. The hides were subsequently transported to the main facility for further processing. Former processes conducted in the main facility included coloring, re-tanning, drying, coating, stuffing, buffing, trimming, and other miscellaneous treatment based on product specifications. Shipping, receiving, chemical storage (tank farm, process tanks, and drum storage), and wastewater pretreatment were also conducted at the Subject Property.

Historical uses of adjacent properties were identified during this assessment which may have to potential to adversely impact the environmental conditions of the Subject Property. These historical adjacent property uses include an electrical transformer yard and automobile repair garage located to the north, and saw mill, wood working facility, blacksmith, and coal sheds formerly located to the west of the Subject Property.

The Subject Property was identified in a search of State and Federal environmental databases as a underground storage tank (UST) site, a Leaking Underground Storage Tank (ME LUST) site, an Aboveground Storage Tank (AST) site, a Leaking Aboveground Storage Tank (LAST) site, a site listed in Maine's Hazardous Material and Oil Spill System Database (ME SPILLS), a Resource Conservation and Recovery Act Non-Generator (RCRA-NonGen) of hazardous waste, and a site listed in hazardous waste manifest databases for Connecticut and New York, the Underground Injection Control database (ME UIC), the Toxic Chemical Release Inventory System (TRIS), the Facility Index System/Facility Registry System (FINDS), and the Maine Tier 2 Information Listing (TIER 2).

The Subject Property was historically registered as a RCRA Large Quantity Generator of hazardous waste from 1980 through 2008. According to Mr. Ed Vigneault, Environmental Services Specialist for the Maine Department of Environmental Protection (MEDEP), the Subject Property underwent a RCRA Hazardous Waste Site Closure Certification in 2009 in accordance with the MEDEP Hazardous Waste Rules and Regulations, which included the completion of several investigations and cleanup activities.

Five USTs were formerly maintained at the Subject Property, including one 1,000-gallon unleaded gasoline UST, one 8,000-gallon diesel UST, one 500-gallon No. 2 fuel oil UST, one 250-gallon No. 2 fuel oil UST, and one 1,000-gallon No. 2 fuel oil UST. These five USTs are listed as having been removed from the site; however, limited documentation regarding the removal of these tanks has been identified, and the locations of these former USTs are currently unknown. Evidence of oil releases from one or more of these tanks was identified during tank removal activities conducted in 1987.

The site reconnaissance performed as part of this assessment identified several ASTs throughout the Subject Property. One 20,000-gallon No. 6 oil AST was observed adjacent to the boiler room in the northwestern portion of the main facility. A secondary containment structure surrounding an approximately 5,000-gallon formic acid AST was observed on the first floor in the eastern portion of the main facility. The tank was not visible; however, staining was not observed on the walls of the secondary containment structure. A lime silo and an approximately 180,000-gallon process water/neutralization tank were observed within the neutralization plant. The neutralization plant was assessed as part of the main Prime Tanning facility; however, the neutralization plant is located on a separate adjacent parcel owned by the Berwick Sewer District and also occupied by a wastewater pump station. An approximately 250-gallon aluminum chloride tank was observed inside the neutralization plant.

A tank farm was observed on the first floor in the northern portion of the main facility building. A total of 19 ASTs, ranging in size from approximately 2,500-gallons to 4,500-gallons were observed. These tanks were reported to have been drained as part of site closure activities. The tank farm consisted of process chemicals utilized in the tannery operations. A propane tank was observed located north of the neutralization plant. Fill and vent pipes associated with an approximately 3,000-gallon No. 2 fuel oil AST were observed along the northern exterior wall of the former Blue Sort Building. The tank room of the Blue Sort Building was locked at the time of the site reconnaissance and not able to be observed. Oil staining was observed on and in the vicinity of the fill pipe. Additional process tanks were also observed during the site reconnaissance, including hot water tanks, river water tanks, and mixing tanks.

Approximately eight wooden mixing drums were observed in the coloring area of the main facility (first floor). The drums were formerly utilized for coloring/dyeing.

Standing water was observed near the loading dock located east of the main facility building. A sheen was not observed on the standing water at the time of the site reconnaissance. Standing water was also observed in a floor trench located in the wet weigh up room (eastern portion of the main facility building), and a sheen was observed.

Several drums were observed throughout the main facility building at the time of the site reconnaissance. Two 55-gallon drums of oil and approximately ten 55-gallon drums of process chemicals (empty or partially full) were observed in the shipping area located within the northeastern portion of the main facility on the first floor. The drums were stored on pallets or directly on the concrete floor and appeared to be in good condition with no leaks or staining observed. Approximately eight 55-gallon drums were observed in the carpenter shop located in the southeastern portion of the main facility and appeared to contain miscellaneous solid waste or parts and equipment. Four 55-gallon drums of boiler feed water treatment chemicals were observed stored on pallets in the boiler room. The drums appeared to be in fair condition at the time of the site reconnaissance with some staining observed on the drums.

An oil storage area was observed inside the former Blue Sort Building. No oils were observed being stored in this area at the time of the site reconnaissance. Lubricating oil, hydraulic oil, and recycled oil were formerly stored in this location. Staining was observed on the concrete floor in this area.

Several transformers were observed throughout the Subject Property and along the site's perimeters. Three pad-mounted transformers were observed within a fenced area along the eastern wall of the main facility. The transformers appeared to be in good condition at the time of the site reconnaissance. Three former pad-mounted transformers were historically located north of the existing transformers. One pole-mounted transformer was observed in the central portion of the main facility parcel, east of the building. The transformer appeared discolored and in fair to poor condition at the time of the site reconnaissance. A total of 11 additional pole-mounted transformers were observed on the Subject Property or along the site's perimeters. These transformers appeared to be in good condition with no evidence of leaks or staining observed.

Several areas of staining were observed on the floors and walls throughout the former tannery facility at the time of the site reconnaissance. The majority of the stains appeared to be due to numerous small releases over time associated with the facility's historic industrial use.

Several floor drains and trenches were observed throughout the first floor of the main facility building. According to the former Facility Engineer for Prime Tanning, the floor drains and trenches are connected to the site's wastewater pretreatment system. The site's pretreatment system neutralizes the process wastewater prior to discharge to the municipal wastewater system. The pretreatment system included a neutralization tank, a lime silo, and aluminum chloride ASTs. Lime was added to the wastewater to adjust the pH, and the aluminum chloride was added to the wastewater for flocculation purposes. The site's pretreatment system has operated since the 1970s. Prior to this date, wastewater from the facility was reportedly discharged directly to the nearby Salmon Falls River through facility drains and a culverted stream beneath the main facility (see below). Wastewater is not currently generated at the Subject Property.

Two drains are located in the delivery areas of the main facility parcel, including the main loading dock located east of the facility building, and a truck off-loading station located in the northwestern portion of the main facility. The drains discharge to a culverted stream that extends through the main facility parcel. Both drains are equipped with shut-off valves that were historically closed during deliveries in order to contain any potential releases of oil or hazardous materials.

On June 19, 2009, Ransom conducted a file review at the MEDEP Bureau of Remediation and Waste Management, as well as, an interview with Mr. Vigneault for information pertaining to the environmental investigations conducted as part of the hazardous waste site closure activities at the Subject Property. Ransom contacted Mr. Vigneault on June 4, 2010 for any updates pertaining to the Subject Property since Ransom's file review in June 2009. Mr. Vigneault stated that he sent a letter to Prime Tanning on July 1, 2009 which acknowledged that he reviewed the closure documents for the site, and closure activities appear to have met the requirements of MEDEP Chapter 851, Standards for Generators of Hazardous Waste, Section 11, RCRA Site Closure.

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 for the property identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively, in the Town of Berwick, York County, Maine (the Subject Property). Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. This assessment has revealed evidence of the following RECs in connection with the Subject Property:

- Historic tannery operations and other various industrial operations conducted on the Subject Property involving the use, storage, and identified releases of oil and hazardous materials represent an environmental concern. Several releases of oil and hazardous materials have been reported and documented for the Subject Property.
- Parcels purchased by Prime Tanning (now part of the existing Lot 146) were historically operated by an oil company (prior to 1962) and a laundry facility (prior to 1974). Former operations involving the use, storage, and potential releases of oil and/or hazardous materials, including petroleum products and dry cleaning chemicals on the Subject Property are considered a REC.
- Although the Subject Property has undergone a RCRA Hazardous Waste Closure Certification in accordance with the MEDEP Hazardous Waste Rules and Regulations, the historic generation, storage, and releases of hazardous wastes on the Subject Property have the potential to have impacted soil, soil vapor, and/or groundwater conditions.
- The locations of the former USTs, reportedly removed from the Subject Property, and subsurface conditions in the vicinity of the former USTs are currently unknown. No documentation relative to the removal or subsurface conditions was available or identified during this study.

- During environmental investigations conducted as part of Prime Tanning site closure activities, significant leather debris was identified in test pits excavated directly north of Prime Tanning's main facility. In addition, the parking lot and driveway areas surrounding the main facility were reportedly constructed with unknown fill materials. Historic improper disposal of buried hides, leather scraps, construction/demolition debris, or other solid waste fill materials conducted by Prime Tanning in other areas of the Subject Property including the fill areas of Lot 133 (parking lot) also represent an environmental concern.
- Historic industrial occupants of Lot 130, including a shoe factory and a building materials and lumber company, may have conducted operations involving the use, storage, and potential releases of oil and/or hazardous materials.
- A former garage located along the northwestern portion of the vacant employee parking lot (Lot 133) was demolished around 2004. Limited information is available pertaining to historic operations within the garage. The unknown operations including potential automotive and/or equipment repair within the garage represent an environmental concern.
- Historic land uses of properties abutting the Subject Property, including a former saw mill, wood working facility, blacksmith, and coal sheds formerly located on properties west of the site, and a transformer yard historically located north of the Subject Property, may have involved the use, storage, and potential releases of oil and/or hazardous materials. In addition, a service garage was historically and is currently located to the northeast and upgradient of the main facility parcel.
- Areas of oil and chemical staining were observed throughout the former tannery facility. Releases of oil or hazardous materials within the facility have the potential to have impacted soil, soil vapor, or groundwater conditions in areas where the concrete slab foundation or exterior walls of the facility are in poor condition.

Ransom also identified the following ASTM non-scope considerations in connection with the Subject Property that represent potential business environmental risk but are outside the standard scope of services prescribed by ASTM Standard Practice E 1527-05:

- Suspect asbestos-containing building materials, including thermal system insulation, such as tank insulation materials, transite panels, and floor tiles, were observed throughout the former tannery facility.
- Suspect PCB-containing building materials, such as window caulking and fluorescent light ballasts, may be present in the former tannery facility.
- Based on the age of the Subject Property buildings, lead-based paint may be present.

Based on the information obtained during this assessment, Ransom concludes that additional investigation is warranted to further evaluate (confirm or dismiss) the RECs identified above. Specifically, Ransom recommends the following:

- A Phase II environmental investigation should be conducted to determine whether the Subject Property has been impacted from historic industrial operations conducted on the site; potential historic releases of oil and/or hazardous materials associated with former onsite USTs; historic industrial operations conducted on adjacent off-site properties; and reported and potential historic release of oil and/or hazardous materials on the Subject Property and nearby off-site properties. In addition, the Phase II environmental investigation is recommended to further evaluate whether improper disposal activities, such as buried hides, leather scraps, construction/demolition debris, or other solid waste fill materials were conducted in other areas of the Subject Property that were not previously assessed or fully assessed during prior investigations.
- A Hazardous Materials Inventory (HMI) should be performed within the former tannery facility to identify potentially regulated building materials such as asbestos-containing building materials, PCB-containing building materials, lead-based paint, and other universal wastes which may require abatement or special disposal considerations when the Subject Property buildings are redeveloped or demolished in the future. Asbestos-containing building materials, suspect lead-based paint, suspect PCB-containing building materials, and universal wastes should be managed appropriately as part of redevelopment activities.
- Areas of significant oil staining should be properly cleaned if future redevelopment plans call for the reuse of such building surfaces or areas. Building materials exhibiting significant staining may need to be properly characterized for disposal if future redevelopment plans involve the demolition of these areas. In addition, any remaining OHM should be properly characterized and disposed of off-site in accordance with local, State, and Federal regulations.
- The Subject Property should be entered into the MEDEP Voluntary Response Action Program (VRAP).

This summary does not contain all the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made or actions taken based on this information.

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## 1.0 INTRODUCTION

The following report presents the findings of a Phase I Environmental Site Assessment (ESA) performed by Ransom Environmental Consultants, Inc. (Ransom) at the property referred to as the Prime Tanning Company in the Town of Berwick, York County, Maine (the "Subject Property"). The Subject Property is identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively. This Phase I ESA was prepared for Southern Maine Regional Planning Commission (SMRPC) on behalf of Prime Tanning Co., Inc. and the Town of Berwick under SMRPC's Brownfields Assessment Program. Refer to the attached Site Location Map (Figure 1) to view the general location of the Subject Property on a 7.5-minute topographic quadrangle.

### 1.1 PURPOSE

The purpose of this Phase I ESA was to assess the environmental condition of the Subject Property by performing "all appropriate inquiry" into the previous ownership and uses of the Subject Property consistent with good commercial or customary practice, taking into account commonly known and reasonably ascertainable information. The goal of the assessment was to identify "recognized environmental conditions" (RECs) in connection with the Subject Property. The term REC means:

*The presence or likely presence of any hazardous substances or petroleum products on a property 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 property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.*

By performing a Phase I ESA of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. §9601) and petroleum products, a user satisfies one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability.

### 1.2 SCOPE OF WORK

This Phase I ESA was performed in general accordance with the requirements of the American Society for Testing and Materials International Designation: E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2005* (ASTM Standard Practice) and Ransom's Master Services Agreement with SMRPC, dated March 18, 2009, and included the completion of the following tasks:

- Review municipal records and search state and federal environmental databases for sites or conditions of environmental concern;
- Review historical land use records to evaluate past use of the Subject Property and adjoining properties;

- Perform a site reconnaissance to visually and/or physically observe current conditions of the Subject property and the general land use of surrounding properties; and
- Conduct interviews with readily available past and present owners, operators, and occupants of the Subject Property.

### 1.3 SIGNIFICANT ASSUMPTIONS

No significant assumptions were made during the performance of this Phase I ESA.

### 1.4 LIMITATIONS, EXCEPTIONS, AND DEVIATIONS

Along with the limitations set forth in various sections of the ASTM Standard Practice E 1527-05 protocol, the accuracy and completeness of this report is limited by the following:

- Access Limitations: The No. 2 heating oil aboveground storage tank (AST) room adjacent to the west of the Blue Sort Warehouse was locked at the time of the site reconnaissance. A storage room located on the second floor of the main facility building was also locked at the time of the site reconnaissance.
- Physical Obstructions to Observations: Overgrown vegetation in the northern portion of Lot 133 and the southern portion of Lot 146 limited observations in these areas.
- Outstanding Information Requests: None
- Historical Data Source Failure: The first obvious developed use of the property identified in this assessment was prior to 1877. Reasonably ascertainable historical information sources researched in this assessment allowed uses of the property to be traced from the present back to 1877, at which time the Subject Property was developed with dwellings, L.R. Hersom's Tannery & Wool Pulling Works, S.P. Horn's Sash & Door Manufactory, Scott's Reed Manufactory, F.M. Clark's Carriage Manufactory, and L.M. & D.H. Nute's Shoe Manufactory. This post-dates the property's obvious first developed use and constitutes a historical data failure per ASTM Standard Practice E 1527-05 § 8.3.2.3.
- Exceptions: None
- Deviations: None
- Other: None

The findings provided by Ransom in this report are based solely on the information reported in this document. Should additional information become available in the future, this information should be reviewed by Ransom and the findings presented herein may be modified. It should be noted that information obtained from state and local agencies is not necessarily all-inclusive and that files may have been reviewed and purged by officials prior to review by the public.

## **1.5 SPECIAL TERMS AND CONDITIONS**

This Phase I ESA was conducted in accordance with our executed Master Services Agreement (contract) with SMRPC, dated March 18, 2009. Authorization and site access was coordinated through Mr. Wayne Chasse, former Facility Engineer for Prime Tanning Company, who provided an explanation of the Subject Property to be assessed.

## **1.6 USER RELIANCE**

The services and the contents of any project reports and associated documents provided to the client by Ransom are solely for the benefit of SMRPC and its Brownfields Program, the Town of Berwick, Maine, Prime Tanning Co., Inc., its affiliates and subsidiaries and their successors, assigns, and grantees. Reliance or any use of this report by anyone other than SMRPC and its Brownfields Program, the Town of Berwick, Maine, and Prime Tanning Co., Inc. for whom it was prepared, is prohibited. Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Ransom's contract with SMRPC. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

## **2.0 SITE DESCRIPTION**

### **2.1 LOCATION AND LEGAL DESCRIPTION**

The Subject Property is known as the former Prime Tanning Company and consists of four parcels of land identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively, in the Town of Berwick, York County, Maine. The Subject Property consists of a former tannery complex, a vacant warehouse (the former Blue Sort Building), paved driveway and parking areas, overgrown vegetation and grass areas, and wooded areas.

Lot 95 is located on the northwest side of Sullivan Street, adjacent to the west of the intersection of Sullivan Street, Wilson Street, and Jordan Street. Lot 130 is located on the northwest side of Sullivan Street, adjacent to the north of the intersection of Sullivan Street, Wilson Street, and Jordan Street. Lot 133 is located on the southeast side of Sullivan Street adjacent to the east of the intersection of Sullivan Street, Wilson Street, and Jordan Street. Lot 146 is located on the southeast side of Sullivan Street, adjacent to the south of the intersection of Sullivan Street, Wilson Street, and Jordan Street.

Tax Assessor Parcel No.: Map U-4, Lots 95, 130, 133, and 146

Refer to the attached Site Plan (Figure 2) for the layout of the Subject Property and adjoining properties.

### **2.2 SUBJECT PROPERTY AND VICINITY CHARACTERISTICS**

The Subject Property and adjacent parcels are located within the Town of Berwick's Commercial/Industrial zone (zone C/I). The southern portion of Lot 146 is located within the Town's Shoreland Overlay Commercial/Industrial zone (zone SC/I). General land use in the vicinity of the Subject Property is classified as primarily Commercial/Industrial and Urban Residential (zone R1).

### **2.3 CURRENT USE OF THE PROPERTY**

The Subject Property is currently occupied by a former tannery complex, the former Blue Sort Warehouse, paved driveway and parking areas, overgrown vegetation and grass areas, and wooded areas. The Prime Tanning facility ceased operations in 2008, and the site has been vacant since that time.

Refer to the attached Site Plans (Figures 2 and 3) for the location of key site features as well as areas of potential environmental concern deemed to represent RECs in connection with the Subject Property.

### **2.4 DESCRIPTION OF STRUCTURES, ROADS, OTHER IMPROVEMENTS ON THE PROPERTY**

The Subject Property is currently improved with a former tannery complex that was constructed in several stages and consists of approximately 344,859 square feet of former operations and office areas located on Lot 146; a 29,652 square foot warehouse building referred to as the former Blue Sort Building located on Lot 130; a former paved employee parking lot on Lot 133; and paved driveway and parking areas, overgrown vegetation and grass areas, and wooded areas throughout various portions of the Subject Property.

## 2.5 CURRENT USES OF ADJOINING PROPERTIES

- North: The Subject Property is bordered to the north by Goodwin Street; Wilson Street; condominiums located at 8A and 8B Goodwin Street (Map U-4, Lot 123-5) owned by Deborah Emerson and Suzanne Sciora, respectively; a shed located at 45 Sullivan Street (Map U-4, Lot 124) owned by Kenneth and Deborah Hall; a residence located at 44 Sullivan Street (Map U-4, Lot 132) owned by Martha and Frank LaPierre; a residence located at 46 Sullivan Street (Map U-4, Lot 131) owned by Deb Bryce; a commercial office building located at 70 Sullivan Street (Map U-3, Lot 009) owned by Frederick and Roberta Goodrich; a public school property and police station located at 45 School Street (Map U-4, Lot 142) owned by the Town of Berwick; a garage located at 16 Wilson Street (Map U-4, Lot 136) owned by John LaPierre; a residence located at 14 Wilson Street (Map U-4, Lot 137) owned by John and Lisa LaPierre; a residence located at 12 Wilson Street (Map U-4, Lot 138) owned by David Rodrique; and a Methodist Church located at 37 School Street (Map U-4, Lot 140).
- South: The Subject Property is bordered to the south by Sullivan Street; Back Street; and Sawmill Hill Road; beyond which are a gas station located at 6 Sawmill Hill Road (Map U-4, Lot 7) owned by Michel Properties, LLC; a Subway and apartment building located at 10 Sullivan Street (Map U-4, Lot 2) owned by Ronald and Noreen Long; a commercial building located at 8 Sullivan Street (Map U-4, Lot 3) owned by the Trustee of David Drolet; a commercial building located at 16 Sullivan Street (Map U-4, Lot 4) owned by Erin Gabrielle Re LLC; and a commercial building located at 4 Sullivan Street (Map U-4, Lot 5) owned by Sullivan Square LLC. The Subject Property is bordered to the southeast by School Street, beyond which is the Town of Berwick Fire Department located at 10 School Street (Map U-1, Lot 7); a commercial office building located at 6 School Street (Map U-1, Lot 8); and a bank building located at 2 School Street (Map U-1, Lot 9) owned by Dana Hall.
- East: The Subject Property is bordered to the east by School Street; a residential duplex located at 11 Wilson Street (Map U-4, Lot 145) owned by Prime Tanning Co., Inc.; a residence located at 7 Wilson Street (Map U-4, Lot 144) owned by Pauline Lord; a residential duplex located at 27 School Street (Map U-4, Lot 150) owned by Prime Tanning Co., Inc.; a residence located at 25 School Street (Map U-4, Lot 149) owned by Prime Tanning Co., Inc.; a wastewater pump station located at 11 School Street (Map U-4, Lot 148) owned by the Berwick Sewer District (Prime Tanning's wastewater pretreatment plant is also located on Lot 148 and was assessed as part of Prime Tanning's main facility); a residence located at 24A & 24B School Street (Map U-1, Lot 3) owned by Karen and Gerard Letarte; and a residence located at 18 School Street (Map U-1, Lot 4) owned by Rita Zerbinopoulos.
- West: The Subject Property is bordered to the west by Sullivan Street; the Berwick Town Hall located at 11 Sullivan Street (Map U-4, Lot 1); a vacant parcel located at 11 Sullivan Street (Map U-4, Lot 90) owned by the Maine D.O.T.; a parking lot located at 15 Sullivan Street (Map U-4, Lot 91) owned by the Town of Berwick; a residence located at 21 Sullivan Street (Map U-4, Lot 93) owned by Jean and Priscilla Dube; a residence located at 25 Sullivan Street (Map U-4, Lot 94) owned by Dylan Hague; a residence located at 11 Jordan Street (Map U-4, Lot 96) owned by Jeffrey Hodges; a residence

located at 8 Jordan Street (Map U-4, Lot 129) owned by Diana Flynn; and the Knights of Pythias lodge located at 9 Goodwin Street (Map U-4, Lot 126).

Land uses of properties adjoining the Subject Property consist primarily of residential, commercial, and municipal properties. The residential properties and commercial businesses do not appear to represent environmental concerns to the Subject Property. The garage located north of Wilson Street may represent an environmental concern given the property's perceived upgradient position to Lot 146. Properties located to the south, including the gas station at 6 Sawmill Hill Road, are presumed to be downgradient of the Subject Property, and therefore are not anticipated to represent a threat to the environmental condition of the Subject Property.

### **3.0 USER-PROVIDED INFORMATION**

An ASTM Phase I ESA User Questionnaire was provided to Mr. Wayne Chasse, former Facility Engineer for Prime Tanning Company, for completion as part of this assessment. A copy of the completed User Questionnaire is included as Appendix A.

#### **3.1 TITLE RECORDS**

No title records in connection with the Subject Property were provided by the user/client.

#### **3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS (AULS)**

No environmental liens or activity/use restrictions in connection with the Subject Property were identified by the user/client.

#### **3.3 SPECIALIZED KNOWLEDGE**

Mr. Chasse provided information pertaining to historic operations conducted at the Subject Property, which has been included throughout pertinent sections of this report. No additional specialized knowledge in connection with the Subject Property or facility operations was provided by the user/client.

#### **3.4 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION**

No additional commonly known or reasonably ascertainable information about the Subject Property that is material to RECs in connection with the Subject Property was provided by the user/client, with the exception of the information provided by Mr. Chasse pertaining to historic operations conducted at the Subject Property, which has been included throughout pertinent sections of this report.

#### **3.5 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES**

The user/client did not identify a reduction in the purchase price of the Subject Property, compared to the fair market value, which was due to the Subject Property being impacted by hazardous substances or petroleum products.

#### **3.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION**

Mr. Chasse, representative of the Subject Property owner, provided information pertaining to historic operations conducted at the Subject Property, which has been included throughout pertinent sections of this report. The Subject Property is currently vacant; therefore, a property manager and site occupants do not currently exist for the Subject Property.

#### **3.7 REASON FOR PERFORMING PHASE I ESA**

This Phase I ESA was performed as part of environmental due diligence at the request of the user/client to identify potential recognized environmental conditions in connection with a potential property transaction.

### **3.8 PREVIOUS ENVIRONMENTAL REPORTS**

No previous environmental reports in connection with the Subject Property were provided by the user/client. Several previous environmental reports were identified in connection with the Subject Property during a records review at the Maine Department of Environmental Protection (MEDEP) Bureau of Remediation and Waste Management on June 19, 2009. These previous environmental reports are summarized in Section 4.2.4.

#### 4.0 RECORDS REVIEW

##### 4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

Ransom contracted Environmental Data Resources, Inc. (EDR) to conduct a search of federal and state databases containing known and suspected sites of environmental contamination. The number of listed sites identified within the approximate minimum search distance (AMSD) from the federal and state environmental records database listings specified in ASTM Standard Practice E 1527-05 are summarized in the following table. Detailed information for sites identified within the AMSDs is provided in Sections 4.1.1 and 4.1.2, along with an opinion about the significance of the listing to the analysis of RECs in connection with the Subject Property. A copy of the EDR research data and a description of the databases are included in Appendix B of this report.

DATABASE RECORD	AMSD (miles)	Total Sites Found	On Subject Property	On Adjoining Property
Federal NPL List	1	0	No	No
Federal Delisted NPL List	0.5	0	No	No
Federal CERCLIS List	0.5	0	No	No
Federal CERC-NFRAP List	0.5	0	No	No
Federal RCRA CORRACTS Facilities List	1	0	No	No
Federal RCRA Non-CORRACTS TSD Facilities List	0.5	0	No	No
Federal RCRA Generators List	Property and Adjoining	0	No	No
Federal Institutional/Engineering Controls Registries	Property Only	0	No	No
Federal ERNS List	Property Only	0	No	No
State-Equivalent NPL List	1	0	No	No
State-Equivalent CERCLIS List	0.5	0	No	No
State Landfill and/or Solid Waste Disposal Site List	0.5	0	No	No
State Leaking UST List	0.5	10	Yes	Yes (1)
State Leaking AST List	0.5	8	Yes	Yes (1)
State Registered UST List	Property and Adjoining	4	Yes	Yes (3)
State Institutional/Engineering Controls Registries	Property Only	0	No	No
State Voluntary Cleanup Sites	0.5	0	No	No
State Brownfield Sites	0.5	0	No	No

#### 4.1.1 Subject Property

The Subject Property was identified in environmental databases searched by EDR as an underground storage tank (UST) site, a Leaking Underground Storage Tank (ME LUST) site, an Aboveground Storage Tank (AST) site, a Leaking Aboveground Storage Tank (LAST) site, a site listed in Maine's Hazardous Material and Oil Spill System Database (ME SPILLS), a Resource Conservation and Recovery Act Non-Generator (RCRA-NonGen) of hazardous waste, and a site listed in hazardous waste manifest databases for Connecticut and New York, the Underground Injection Control database (ME UIC), the Toxic Chemical Release Inventory System (TRIS), the Facility Index System/Facility Registry System (FINDS), and the Maine Tier 2 Information Listing (TIER 2).

According to EDR, five USTs were formerly maintained at the Subject Property (Facility ID 9434), including one 1,000-gallon unleaded gasoline UST that was installed in 1978 and removed in 1987; one 8,000-gallon diesel UST that was installed in 1978 and removed in 1987; one 500-gallon No. 2 fuel oil UST that was installed in 1969 and removed in 1986; one 250-gallon No. 2 fuel oil UST that was installed in 1969 and removed in 1994; and one 1,000-gallon No. 2 fuel oil UST that was installed in 1969 and removed in 1994. Evidence of oil releases from one or more of these tanks was identified during tank removal activities conducted in 1987. According to MEDEP Spill Report P-288-1987, evidence of a gasoline release due to corrosion of a UST was identified during tank removal activities conducted in August 1987. Impacted materials were excavated, aerated and reused in the parking lot area of this facility. No further response actions were required by the MEDEP at that time.

One additional UST is registered for a single residence owned by Prime Tanning Company (Facility ID 16038) in Sullivan Square. This single residence UST was a 1,000-gallon No. 2 fuel oil UST that was installed in 1969 and removed in 1990. No additional information was identified pertaining to this former UST.

Several ASTs were registered for the Subject Property that contained chemicals for onsite use within the tannery process. According to EDR, the ASTs registered for the site contained propane, calcium oxide, aluminum chloride solution, No. 2 fuel oil, 85 percent formic acid, No. 6 fuel oil, mineral spirits, and 62 percent phosphoric acid.

One LAST incident was identified for the Subject Property. According to MEDEP Spill Report P-466-2006, approximately two gallons of heat transfer oil were released to the concrete floor due to an overflow in June 2006. The release was cleaned with sorbents, and no further response actions were required by the MEDEP.

Several additional spill events were reported for the Subject Property and are summarized below.

- According to MEDEP Spill Report P-337-1983, a hazardous material incident was reported at the Subject Property in May 1983. Approximately 300 gallons of an unspecified hazardous material were released due to corrosion of piping. A portion of the material was recovered and put back into the process, and additional cleanup activities were reported. No further response actions were required by the MEDEP.
- According to MEDEP Spill Report P-143-1984, another hazardous material incident was reported at the Subject Property in May 1984. Approximately 300 gallons of an unspecified hazardous material were released due to a transportation accident. Cleanup activities were reported, and no further response actions were required by the MEDEP.

- According to MEDEP Spill Report P-81-1985, approximately 2,000 gallons of a non-hazardous material were released on the Subject Property in April 1985. The material was recovered, and no further response actions were required.
- According to MEDEP Spill Report P-247-1985, approximately 100 gallons of waste oil were released on the Subject Property in September 1985 due to a human error. The release was cleaned with sorbents, and no further response actions were expected by the MEDEP at that time.
- According to MEDEP Spill Report P-204-1986, approximately 175 gallons of an unspecified hazardous chemical were released on the site in June 1986 due to human error. Cleanup activities, including excavation activities, were reported. No further response actions were expected by the MEDEP.
- MEDEP Spill Report P-478-1991 documents a citizen complaint of a hazardous material incident at the Subject Property in August 1991. The report states approximately 250 gallons of an unspecified hazardous chemical were released on the Subject Property due to storm damage. The report states that the release was treated, and no further response actions were expected by the MEDEP.
- According to MEDEP Spill Report P-386-1994, approximately six gallons of No. 4 fuel oil were released on the Subject Property due to a mechanical failure (loose fitting) in June 1994. The release was cleaned with sorbents, and no further response actions were expected by the MEDEP at that time.
- MEDEP Spill Report P-430-1999 documents a hazardous material incident that occurred on the Subject Property in June 1999. Cleanup activities were reported, and no further response actions were expected by the MEDEP at that time.
- According to MEDEP Spill Report P-332-2003, approximately 20 gallons of hydraulic oil were released from a compactor to the concrete floor in the facility due to a mechanical failure in May 2003. The release was contained and cleaned with sorbents.
- According to MEDEP Spill Report P-72-2004, approximately 20 gallons of a hazardous material were released to the ground surface when a fork lift punctured the chemical container in January 2004. The release was contained and cleaned with sorbents.
- According to MEDEP Spill Report P-538-2004, approximately one gallon of roofing adhesive was spilled on the floor and cleaned by Prime Tanning employees. No response actions were required by the MEDEP.
- According to MEDEP Spill Report P-982-2004, approximately 2.5 gallons of a leather dye chemical were released to the ground surface while the container was being transported by a fork truck in October 2004. The release was cleaned up by Prime Tanning personnel and disposed of as a hazardous waste.
- According to MEDEP Spill Report P-226-2005, approximately two gallons of hydraulic oil were released when a reservoir seal failed in March 2005. The release was contained and cleaned with sorbents.

- MEDEP Spill Report P-541-2005 documents a flood event at the Subject Property in June 2005 which caused a number of non-hazardous chemicals (an estimated 90 gallons total) to be spilled at the Subject Property. The released chemicals were not able to be recovered due to the flood event.
- According to MEDEP Spill Report P-564-2005, approximately one gallon of residual hydraulic oil was released from a piece of out-of-service machinery that was being taken off-site in July 2005. The release was cleaned with sorbents.
- According to MEDEP Spill Report P-642-2005, approximately 25 gallons of a hazardous chemical were accidentally released to the facility's cement floor in August 2005. The release was cleaned with sorbents, and no further response actions were required by the MEDEP.
- According to MEDEP Spill Report P-998-2005, approximately five gallons of heat transfer oil were released to the floor inside the facility in December 2005 due to a mechanical failure. The release was cleaned with sorbents, and no further response actions were required by the MEDEP.
- According to MEDEP Spill Report P-104-2006, approximately one gallon of heat transfer oil was released to the floor inside the facility in February 2006. The release was cleaned with sorbents, and no further response actions were required by the MEDEP.
- According to MEDEP Spill Report P-187-2006, approximately ten gallons of hydraulic oil were released to the cement floor inside the facility due to a broken fitting in March 2006. Approximately one gallon of the oil discharged to a floor drain, and the remainder was cleaned with sorbents.

The Subject Property was identified as a RCRA Non-Generator of hazardous waste; hazardous wastes are no longer generated at the site. The Subject Property was historically registered as a RCRA Large Quantity Generator (LQG) of hazardous waste from 1980 through 2008. Hazardous wastes formerly generated at the Subject Property included ignitable, corrosive, and reactive hazardous wastes as well as barium, chromium, mercury, silver, chloroform, methyl ethyl ketone, spent solvents, spent cyanide plating solutions, and sodium azide wastes. Inspections of the Prime Tanning facility were conducted by State and Federal agencies from 1985 through 2001. The facility received several notices of violations, and according to EDR, the facility subsequently achieved compliance for these violations. According to Mr. Ed Vigneault, Environmental Services Specialist for the MEDEP, the Subject Property has undergone RCRA hazardous waste site closure, which included the completion of several investigations and cleanup activities. RCRA closure activities are detailed in Section 4.2.4 (Maine Department of Environmental Protection).

According to the EDR Report, the Subject Property is identified as a ME UIC site (ID 400365) due to the floor drains associated with the facility. However, information provided by Mr. Wayne Chasse suggested that all of the floor drains within the facility were connected to the wastewater neutralization plant and ultimately discharge to the sanitary sewer system.

#### 4.1.2 Discussion of Database Findings

EDR identified a total of 23 surrounding properties in environmental databases located within the AMSD from the Subject Property. These properties are listed in the table below and discussed in the following sections.

Site	Distance/Direction	Comments
Town Office Sullivan Square Berwick, ME	Adjacent/W Sidegradient	ME UST
Paul Kennedy 10 School Street Berwick, ME	Adjacent/SE Downgradient	ME LAST
Berwick United Methodist Church 24 School Street Berwick, ME	Adjacent/NE Upgradient	ME UST
Gateway Gas Gateway Gas Inc. Berwick Mobil Steve's Mobil 2 Berwick Street Berwick, ME	Adjacent/S Downgradient	ME UST ME LUST ME SPILLS
Cumberland Farms Inc 1817 Cumberland Farms Gulf 25 School Street Route 9 42 School Street Berwick, ME	570 ft./ENE Sidegradient	ME UST ME LUST RCRA-SQG
New Hope Community Church 24 Rochester Street Berwick, ME	609 ft./W Sidegradient	ME LAST
Apartment Building 1 Bridge Street Berwick, ME	620 ft./SW Downgradient	ME LAST
Breton Property Breton Dry Cleaners Breton Cleaners 2 Market Street 1 Winter Street Somersworth, NH	829 ft./SSW Hydraulically Isolated	US Brownfields FINDS NH Drycleaners RCRA – Non-Gen RI Manifest
Roadside Release 1 Market Street Somersworth, NH	829 ft./SSW Hydraulically Isolated	NH ALLSITES
Somersworth Housing Authority Property 28 Market Street Somersworth, NH	837 ft./S Hydraulically Isolated	NH All Sites

Site	Distance/Direction	Comments
Jerry's Apartments 19 Jordan Street Berwick, ME	852 ft./W Sidegradient	ME LAST
Shirley Yost Shirly & Michael Yost 64 Bridge Street Berwick, ME	1,092 ft./WNW Sidegradient	ME UST ME LUST
Marouthis Property 8 Annie Street Berwick, ME	1,217 ft./NW Sidegradient	ME LAST
Stephen Geller 30 Goodwin Street Berwick, ME	1,241 ft./NW Upgradient/Sidegradient	ME LAST
Getty Station 55236 18 High Street Somersworth, NH	1,326 ft./S Hydraulically Isolated	NH LUST FINDS NH All Sites
Rouleaus Auto Repair 20 Main Street Somersworth, NH	1,535 ft./S Hydraulically Isolated	NH UST NH LUST NH All Sites
Marjorie Greg 4 Mariam Street	1,981 ft./ESE Sidegradient	ME LAST
Frank Stefanic 35 Page Street Somersworth, NH	2,031 ft./SW Hydraulically Isolated	NH All Sites
Fairpoint 106 High Street Somersworth, NH	2,341 ft./SSW Hydraulically Isolated	NH All Sites NH UST NH LUST
Arthur Beauchesne 116 High Street Somersworth, NH	2,565 ft./SSW Hydraulically Isolated	NH All Sites
General Electric Co. 130 Main Street Somersworth, NH	3,721 ft./S Hydraulically Isolated	RCRA - LQG CERC - NFRAP NH UST NH SHWS FINDS PADS NY Manifest RI Manifest
Great Falls Gas Works Depot Road Somersworth, NH	3,885 ft./SSE Hydraulically Isolated	Manufactured Gas Plant
Facemate PL GF 200 Main Street Somersworth, NH	4,970 ft./SSE Hydraulically Isolated	RCRA-NonGen FINDS NH SHWS NH All Sites NH UST NH Brownfields

Federal NPL Sites

No federal National Priority List (NPL) or proposed NPL sites were identified by EDR within one mile of the Subject Property.

Federal Delisted NPL Sites

No federal Delisted NPL sites were identified by EDR within 0.5 mile of the Subject Property.

Federal CERCLIS Sites

No federal Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) sites were identified by EDR within 0.5 mile of the Subject Property.

Federal CERCLIS-NFRAP Sites

No federal CERCLIS No Further Remedial Action Planned (NFRAP) sites were identified by EDR within 0.5 mile of the Subject Property.

Federal RCRA CORRACTS Facilities

No federal Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS) facilities were identified by EDR within one mile of the Subject Property.

Federal RCRA Non-CORRACTS TSD Facilities

No federal RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) facilities were identified by EDR within 0.5 mile of the Subject Property.

Federal RCRA Generators

No federal RCRA hazardous waste generators were identified by EDR on or adjoining the Subject Property.

Federal Institutional Control/Engineering Control Registries

No federal Institutional/Engineering Control sites were identified by EDR on the Subject Property.

Federal ERNS List

No federal Emergency Response and Notification System (ERNS) sites were identified by EDR on the Subject Property.

State and Tribal Equivalent NPL/Hazardous Waste Sites

No state or tribal equivalent NPL sites were identified by EDR within one mile of the Subject Property.

#### State and Tribal Equivalent CERCLIS/Hazardous Waste Sites

No state or tribal Equivalent CERCLIS hazardous waste sites were identified by EDR within 0.5 mile of the Subject Property.

#### State and Tribal Landfill and/or Solid Waste Disposal Sites

No state or tribal landfills and/or solid waste disposal sites were identified by EDR within 0.5 mile of the Subject Property.

#### State and Tribal Registered UST Sites

Three state registered UST sites were identified adjoining the Subject Property and are discussed below.

The Town Office located at Sullivan Square, adjacent to the west and in a perceived sidegradient position to the Subject Property, was identified as a UST site. According to the EDR Report, one 500-gallon No. 2 fuel oil UST was installed at this property in 1982 and removed in 1997. A new 1,000-gallon No. 2 fuel oil UST was installed at the Town Office property in 1997 and is currently active. No releases from the former or active USTs were reported; therefore, this property does not appear to represent an environmental concern to the Subject Property.

The Berwick United Method Church located at 24 School Street, adjacent to the northeast and in a perceived upgradient position to the Subject Property, was identified as a UST site. According to the EDR Report, one 500-gallon No. 2 fuel oil UST was installed at this property in 1985 and removed in 1992. Historic releases from this UST were not reported; therefore, the church property does not appear to represent an environmental concern to the Subject Property.

Gateway Gas (also referred to as the Berwick Mobil) located at 2 Berwick Street, adjacent to the south and in a perceived downgradient position to the Subject Property, was identified as a UST site. According to the EDR Report, seven USTs were formerly maintained on this site, including one 1,000-gallon diesel UST that was installed in 1970 and removed in 1991; one 6,280-gallon unleaded gasoline UST that was installed in 1970 and removed in 1991; two 5,000-gallon unleaded gasoline USTs that were installed in 1970 and removed in 1991; one 4,000-gallon unleaded gasoline UST that was installed in 1970 and removed in 1991; one 3,000-gallon regular gasoline UST that was installed in 1969 and removed in 1991, and one 1,000-gallon No. 2 fuel oil UST that was installed in 1970 and abandoned-in-place in 1991. Two USTs were installed in 1991 and are currently active, including two 6,000-gallon unleaded gasoline USTs, and one 5,000-gallon unleaded gasoline UST. Historic releases from these USTs were identified during tank removal activities in 1991 (refer to the following section – State and Tribal LUST Sites).

#### State and Tribal LUST Sites

Six state leaking underground storage tank (LUST) sites were identified by EDR within 0.5 mile of the Subject Property and are summarized below.

Gateway Gas (also referred to as the Berwick Mobil and Steve's Mobil) located at 2 Berwick Street, adjacent to the south and in a perceived downgradient position to the Subject Property, was identified as a LUST site. According to MEDEP Spill Report P-351-1991, an oil release was identified at this site during tank and/or piping removal activities in June 1991 due to tank corrosion.

Approximately 101 gallons of impacted media were recovered through excavation activities. Impacted materials were disposed off-site at Commercial Paving, and no further response actions were required by the MEDEP at that time. According to MEDEP Spill Report P-618-1992, approximately 10 gallons of gasoline were accidentally released at this site in September 1992. The release was cleaned with sorbents, and no further response actions were expected. According to MEDEP Spill Report P-744-1996, an overflow of an on-site UST occurred in November 1996. The release was responded to and cleaned up by the Berwick Fire Department. No further response actions were required by the MEDEP at that time. According to MEDEP Spill Report P-458-2007, gasoline was discovered in the interstitial space of a UST at this facility in June 2007. Remaining product was pumped out of the UST, and the tank was taken out of service. No further response actions were required at that time. Given the perceived downgradient location of this site to the Subject Property, and that no further response actions were required by the MEDEP, this property does not appear to represent an environmental concern to the Subject Property.

The Cumberland Farms Gulf (also referred to as the Cumberland Farms Store No. 1817) located at 25 School Street, approximately 570 feet east-northeast and in a perceived sidegradient position to the Subject Property, was identified as a LUST site. According to MEDEP Spill Report P-645-1991, an unspecified non-oil, non-hazardous incident was reported for this property on March 18, 1991. No further response action was required by the MEDEP at that time. According to MEDEP Spill Report P-499-1993, an oil release was reported for this facility in August 1993. The cause for the release was reported as a transportation accident. Approximately 45 gallons of gasoline were released on the site. Cleanup activities, including excavation and off-site disposal of impacted media, were reported. No further response activities were expected by the MEDEP at that time. According to MEDEP Spill Report P-419-1997, evidence of gasoline releases from onsite USTs were reported during tank and piping removal activities in August 1997. The MEDEP indicated that no holes in the tanks were observed and that soil contamination did not appear to be extensive. The site was assigned a Baseline-2 cleanup goal by the MEDEP of 1,000 parts per million by headspace analysis. Approximately 208 tons of impacted soil were excavated and disposed off-site with a virgin petroleum disposal letter, primarily to facilitate the new facility construction. The spill report states that no further actions were required by the MEDEP at that time, but impacted soils may remain on-site and should be managed properly if disturbed in the future. According to MEDEP Spill Report P-111-2003, approximately 10 gallons of gasoline were released to the ground surface when a fuel line detached from the fuel tank while a customer was filling their gas tank in February 2003. Cyn Environmental was obtained to clean the discharge and dispose of impacted materials. No further response action was required by the MEDEP at that time. Given the perceived sidegradient location of this site to the Subject Property and that no response actions were required by the MEDEP, the Cumberland Farms Gulf site does not appear to represent an environmental concern to the Subject Property.

The Shirly and Michael Yost residence located at 64 Bridge Street, approximately 1,100 feet west-northwest and in a presumed sidegradient position to the Subject Property, was identified as a LUST site. According to MEDEP Spill Report P-1237-2001, approximately 50 gallons of No. 2 fuel oil were pumped from one 500-gallon No. 2 fuel oil UST, and the tank was subsequently removed from the property. No releases from the UST were identified, and no further response action was required by the MEDEP at that time. Given the perceived sidegradient position of the Yost residence to the Subject Property, and that no response actions were required by the MEDEP, the Yost residence does not appear to represent an environmental concern to the Subject Property.

The Getty Station 55236 located at 18 High Street in Somersworth, New Hampshire, approximately 1,330 feet south and hydraulically isolated from the Subject Property, was identified as a LUST site. Given the distance to the Subject Property and that this site is located in a perceived hydraulically isolated position from the Subject Property, the Getty Station 55236 does not appear to represent an environmental concern to the Subject Property.

The Rouleaus Auto Repair site located at 20 Main Street in Somersworth, New Hampshire, approximately 1,550 feet south and hydraulically isolated from the Subject Property, was identified as a LUST site. Given the distance to the Subject Property and that this site is located in a perceived hydraulically isolated position from the Subject Property, the Rouleaus Auto Repair site does not appear to represent an environmental concern to the Subject Property.

Fairpoint located at 106 High Street in Somersworth, NH, approximately 2,350 feet south-southwest and hydraulically isolated from the Subject Property, was identified as a LUST site. Given the distance to the Subject Property and that this site is located in a perceived hydraulically isolated position from the Subject Property, this site does not appear to represent an environmental concern to the Subject Property.

#### State and Tribal LAST Sites

Seven state LAST sites were identified by EDR within 0.5 mile of the Subject Property and are summarized below.

The Paul Kennedy residence located at 10 School Street, adjacent to the southeast and in a perceived downgradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-32-1997, approximately 70 gallons of No. 2 fuel oil were released to the ground surface at the residence due to accidental damage to the AST in January 1997. The release was cleaned somewhat with sorbents, and approximately five cubic yards of impacted soil were excavated and disposed off-site. No further response actions were expected at that time. Given the residence's downgradient position to the Subject Property and that cleanup activities were reported, the residence does not appear to represent an environmental concern to the Subject Property.

The New Hope Community Church located at 24 Rochester Street, approximately 600 feet west and in a perceived sidegradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-94-2002, approximately 200 gallons of No. 2 fuel oil were released to the ground surface due to corrosion of an AST in February 2002. Approximately 34 cubic yards of impacted soil were excavated and disposed off-site. Inaccessible contaminated soils remain on this site underneath the building foundation. Given this church's sidegradient position to the Subject Property and that cleanup activities were reported, the church does not appear to represent an environmental concern to the Subject Property.

An apartment building located at 1 Bridge Street, approximately 620 feet southwest and in a perceived downgradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-216-2007, No. 2 fuel oil was released to the basement of this building during a flood event in April 2007. The released oil was washed into the nearby river due to the flood. Approximately 50 gallons of remaining oil was pumped out of the AST by Clean Harbors, and no further response actions were required by the MEDEP at that time. Given this site's downgradient position to the Subject Property, this property does not appear to represent an environmental concern to the Subject Property.

Jerry's Apartments located at 19 Jordon Street, approximately 850 feet northwest and in a perceived sidegradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-704-2001, approximately 40 to 50 gallons of No. 2 fuel oil were released to the basement floor due to an accidental overflow in September 2001. The Berwick Fire Department contained the release with sorbents, and the oily waste was subsequently cleaned and disposed off-site by Fleet Environmental. Given that cleanup activities were reported for this release, this property does not appear to represent an environmental concern to the Subject Property.

The Marouthis Property located at 8 Annie Street, approximately 1,200 feet northwest and in a perceived sidegradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-251-1996, approximately 20 gallons of No. 2 fuel oil were released to the ground surface of this residence due to a tank overflow in April 1996. Contaminated soils were excavated and disposed off-site. Given that cleanup activities were reported for this release, this property does not appear to represent an environmental concern to the Subject Property.

The Stephen Geller residence located at 30 Goodwin Street, approximately 1,250 feet northwest and in a perceived upgradient/sidegradient position to the Subject Property, was identified as a LAST site. According to MEDEP Spill Report P-167-1995, approximately 200 gallons of No. 2 fuel oil were released to the ground surface due to corrosion of an AST in March 1995. The release was cleaned with vacuum trucks and sorbents, and no further response actions were required by the MEDEP at that time. Given that cleanup activities were reported for this release, this property does not appear to represent an environmental concern to the Subject Property.

The Marjorie Greg residence located at 4 Mariam Street, approximately 2,000 feet east-southeast and in a perceived sidegradient position to the Subject Property, was identified as a LAST site. MEDEP Spill Report P-51-1998 documents a complaint of odor/vapors in the residence. The furnace was taken out of service, and the system was checked for leaks. No further response actions were expected by the MEDEP at that time. Given the distance and perceived sidegradient position of this residence to the Subject Property, this residence does not appear to represent an environmental concern to the Subject Property.

#### State and Tribal Institutional Control/Engineering Control Registries

No state or tribal Institutional/Engineering Control sites were identified by EDR on the Subject Property.

#### State and Tribal Voluntary Cleanup Sites

No state or tribal Voluntary Cleanup sites were identified by EDR within 0.5 mile of the Subject Property.

#### State and Tribal Brownfield Sites

No state or tribal Brownfields sites were identified by EDR within 0.5 mile of the Subject Property.

One U.S. Brownfields site was identified by EDR within 0.5 mile of the Subject Property. The Breton Property located at 1 Winter Street in Somersworth, New Hampshire, approximately 830 feet south-southwest and hydraulically isolated from the Subject Property, is a U.S. Brownfields site. A Phase I ESA was completed for this site in April 2005, a Phase II investigation was completed in December 2005, and a Phase III investigation was completed in September 2006. Soil and groundwater contamination was identified at the site, and cleanup is required. According to the EDR report, the Breton Property is currently vacant, but was formerly occupied by a railroad storage shed and a drycleaner/laundry facility.

Given the distance to the Subject Property and that this site is hydraulically isolated from the Subject Property, the Breton Property does not appear to represent an environmental concern to the Subject Property.

#### Orphan Sites

EDR orphan site designation indicates insufficient address information for the site to be plotted. Ransom reviewed the 40 Orphan Sites identified by EDR and determined that these Orphan Sites are located in positions considered to be downgradient, sidegradient, or hydrologically isolated from the Subject Property, or are beyond the applicable ASTM search parameters. Therefore, these Orphan Sites are unlikely to impact the Subject Property.

#### **4.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES**

Ransom contacted the Town of Berwick municipal offices and the MEDEP for information pertaining to the Subject Property, including records of underground or aboveground storage tanks, hazardous waste storage, and/or petroleum or hazardous materials spills at the Subject Property. Information obtained from the municipal offices and the MEDEP is summarized in the following sections.

##### **4.2.1 Fire Department**

Ransom contacted the Town of Berwick Fire Department on June 4, 2010 to request information in connection with the Subject Property, including records of underground or aboveground storage tanks, hazardous waste storage, and/or petroleum or hazardous materials spills. Chief Dennis Plante of the Berwick Fire Department informed Ransom that he has no records of USTs on the Subject Property; however, Chief Plante stated that to the best of his knowledge, any historic USTs were removed from the site. Chief Plante stated that there have been several large fires at the Prime Tanning facility over the years, primarily involving their buffing operations. Many of the fires occurred in the early 1970s. He also stated that all oil or hazardous material spills were handled by Prime Tanning's in-house response team.

##### **4.2.2 Assessor's Office**

The Subject Property consists of four parcels of land identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively, in the Town of Berwick. The total area of the four parcels that comprise the Subject Property is approximately 11.4 acres. Property cards obtained from the Town of Berwick Assessor's Office on May 17, 2010 indicate that the Subject Property parcels are currently owned by Prime Tanning Co., Inc. According to the Assessor's Office, the Subject Property is located within the Town of Berwick's Commercial/Industrial zone (zone C/I). The southern portion of Lot 146 is located within the Town's Shoreland Overlay Commercial/Industrial zone (zone SC/I).

According to the current property card for Lot 95, the parcel encompasses approximately 0.2 acres of vacant land. A residence was formerly located on this parcel and burned down in 1995. The residence formerly encompassed a footprint of approximately 980 square feet. According to the historic property cards, dated 1979 and 2002, Prime Tanning obtained Lot 95 in 1993. The owner of the parcel circa 1979 was Stanley Thompson, Jr.

The current property card for Lot 130 states the parcel encompasses approximately 0.7 acres and is occupied by a commercial warehouse with an office, lunch room, and a loading area. The warehouse building encompasses approximately 14,341 square feet and is heated with an oil-fired furnace and a forced hot air. The warehouse building has a concrete slab-on-grade foundation and a steel frame. According to historic property cards, dated 1979 – 1987 and 2002, Lot 130 has been owned by Prime Tanning since prior to 1979. The property cards indicated the original portions of the warehouse were constructed in the mid-1970s, and the loading dock was an addition constructed in 1984.

The current property card for Lot 133 states the parcel encompasses 2.8 acres and consists of a vacant parking lot. Historical property cards for Lot 133, dated 1979 – 1985, 2002, and 2006, indicate that Prime Tanning has owned the parking lot parcel since 1974. Ownership prior to 1974 was not identified on the historic property cards. The 1979 – 1985 property card notes that Lot 133 consisted of a parking lot and an old garage/storage shed. In 1980, land was added to the former Map U4, Lot 133 parcel from parcels identified as Map U4, Lots 134 and 135 to comprise the current Lot 133. Around 1981, an office building, parking lot, and garage used for storage were located on Lot 133 and utilized by Prime Tanning. The 1979 – 1985 property cards states that the office building was moved off the lot in 1984. Circa 1989, the parking lot was paved. Town of Berwick Code Enforcement records for Lot 133 (discussed in the following section) include a land use permit, dated December 11, 2003, that states an old shed was located on the Subject Property in the western portion of the site and was proposed to be demolished.

The current property card for Lot 146 states the parcel encompasses approximately 7.71 acres and is occupied by the Prime Tanning manufacturing facility. The property card states the plant closed on October 31, 2008. According to the current property card, the Prime Tanning facility encompasses a footprint of approximately 248,800 square feet. The facility was constructed in several phases over time, and is generally constructed of concrete block walls, concrete or wooden floors, and a flat tar and gravel roof. The majority of the facility consists of two stories. The facility was formerly heated with steam generated onsite by oil-fired boilers. According to historic property cards, dated 1979 – 1983, 2003, and 2006, the facility has been owned by Prime Tanning since prior to 1979.

An employee at the Town of Berwick Assessor's Office also provided a copy of a historical map entitled, "Bird's Eye View of Great Falls & Berwick," dated 1877. The Subject Property is depicted as comprised of dwellings, L.R. Hersom's Tannery & Wool Pulling Works, S.P. Horn's Sash & Door Manufactory, Scott's Reed Manufactory, F.M. Clark's Carriage Manufactory, and L.M. & D.H. Nute's Shoe Manufactory at that time. A Methodist church and a high school house are located east of the Subject Property. Land to the north of the Subject Property is depicted as primarily undeveloped on the 1877 map.

#### **4.2.3 Code Enforcement Office**

Records maintained by the Town of Berwick Code Enforcement Office were reviewed on May 17, 2010.

Records on file for Lot 95 included a warranty deed for the parcel. According to the warranty deed, Prime Tanning Company, Inc. purchased the parcel from Stanley H. Thompson, Jr. on July 26, 1993.

Records on file for Lot 130 included conditional use permits dated 1986 through 1988. A 1986 permit was for the construction of the "wet blue leather warehouse" (presumed to be part of the existing Blue Sort Building). A 1988 permit allowed Prime Tanning to enclose the space between two separate warehouse buildings on Lot 130.

More recent records on file for Lot 130 included 2009 correspondence regarding ACM Specialized Materials' interest in purchasing the Blue Sort Building, the vacant lot, and the parking lot parcels. ACM Specialized Materials submitted a conditional use permit application (not dated) for use of these parcels for warehouse activities and distribution of copper, brass, aluminum, stainless steel, etc. A letter from the Town Engineer, dated April 10, 2009, stated that any change in use or physical expansion would require a Site Plan Review.

Records on file for Lot 133 included land use applications and permits and an application for abatement of property taxes. One land use permit, dated September 1, 1993, provided Prime Tanning permission to gravel and level the back land of the existing parking lot (the northern portion of Lot 133). A second land use permit, dated December 11, 2003, approved Prime Tanning's request to demolish the old shed at the rear of the parking lot on Wilson/Sullivan Streets. A site plan was included with Prime Tanning's permit application that depicts the shed located in the western portion of Lot 133, adjacent to the northwestern perimeter of the parking lot. The application for abatement of property taxes was completed by Prime Tanning on February 14, 2007. The application stated that there had been no market value increase for the industrial property (the Subject Property) and requested that the assessed valuation of the Subject Property be reduced. An abatement application recommendation approved the request due to the fact that a garage listed on the property in 2007 had been removed prior to tax year 2006 – 2007.

Several records were on file for the main facility parcel (Lot 146), including a 1988 Consent Agreement between Prime Tanning and the MEDEP pertaining to historic chemical discharges and required enforcement actions; 1988 – 1989 correspondence and specifications pertaining to the construction of a new chemical storage shed; 1989 plans for proposed river water intake structural upgrades; numerous permit applications and permits for renovations to areas of the main facility structure, construction of various additions to the main facility, and demolition of select portions of the main facility throughout the 1980s and 1990s; a 1990 Pretreatment Building Plan depicting the neutralization tank, lime silo, and pumping station; 1990 correspondence and approvals to increase the size of Prime Tanning's wastewater pretreatment plant; and a 2004 conditional use permit to create a parking and park area at the southern end of Lot 146.

A Conditional Use File was also included in the records for Lot 146. The file included conditional use permits from the 1970s through the 1990s for various construction and renovation activities on the main facility parcel. A letter from the Code Enforcement Office to Land America, dated March 15, 2007, stated that the Subject Property conforms to all land use and development requirements. A Federal Emergency Management Agency (FEMA) Letter of Map Amendment Determination Document states that the 20 Sullivan Street property is located in a Special Flood Hazard Area associated with the Salmon Falls River. A Department Order between the MEDEP and Prime Tanning pertaining to Natural Resource Protection Act (NRPA) conditions associated with the proposed river water intake structural improvements in 1988 was included in the file. Also included in the Conditional Use File was a 1974 site plan created by H.I. & E.C. Jordon depicting the Berwick Sewer District parcel, sewer lines, and an easement on the Subject Property. Transformers were also depicted on the site plan within an enclosed area on the eastern side of the main facility building.

#### **4.2.4 Maine Department of Environmental Protection**

Records maintained at the MEDEP Bureau of Remediation and Waste Management file room were reviewed by Ransom on June 19, 2009. Information regarding oil and hazardous materials used, stored, and released at the Prime Tanning facility is summarized below.

The U.S. Environmental Protection Agency (EPA) sent a letter to the MEDEP on August 14, 1985 stating that the EPA conducted a hazardous waste inspection at the Prime Tanning facility on June 21, 1985 and identified several violations of state hazardous waste regulations, including improper storage area sizes, improperly labeled hazardous waste storage containers, and lack of personnel training program and a contingency plan for the facility.

An Administrative Consent Agreement and Enforcement Order was executed between Prime Tanning, the MEDEP, and the State of Maine Assistant Attorney General in 1988. The document summarized a release of 175 gallons of ethylene glycol monoethyl ether into a storm drain located at the Prime Tanning loading dock that subsequently discharged into the Salmon Falls River. This hazardous waste discharge violated several regulations. As a result, Prime Tanning installed a shut-off gate valve onto the storm drain and agreed to close the device whenever chemicals or hazardous material were handled or unloaded at the facility. Five releases of hazardous materials were identified in 1985 where Prime Tanning failed to operate the shut-off valve, and the materials were discharged to the adjacent river. The document states that Prime Tanning and the MEDEP had not identified evidence that these violations have resulted in significant long-term adverse environmental impacts to the Salmon Falls River. Prime Tanning outlined preventative measures in December 1986 to eliminate future discharges, including the installation of corrosion resistant tanks, restricting the unloading area at the facility, the completion of employee training, and sealing a floor drain. Prime Tanning agreed to complete inspections, submit contingency plans, and conduct training and sampling to resolve the identified violations.

The MEDEP issued a Departmental Finding of Fact and Order (Air Emission License Amendment No. 4) to Prime Tanning on December 13, 1993. The document summarized Prime Tanning's operations at that time, including emission equipment (fuel burning and process equipment), volatile organic compound (VOC) emissions reduction programs under way at the facility, emission limits for the facility, and compliance requirements.

The MEDEP conducted a hazardous waste inspection of Prime Tanning on November 18, 1994. Prime Tanning was identified as a generator with licenses established with the Bureau of Air Quality Control and with the Town of Berwick (pertaining to industrial pretreatment). The MEDEP identified violations, and issued a Notice of Violation to Prime Tanning on March 29, 1995. Violations included omissions in the facility's Contingency Plan, failure to provide firm impervious working surfaces designed to contain spills, and failure to properly label hazardous waste containers.

A report entitled, "Closure Certification for 5,000-Gallon Hazardous Waste Storage Tank, Prime Tanning Co., Inc.," was completed by Summit Environmental Consultants, Inc. in October 1997. The report documents the decontamination and removal of the 5,000-gallon aboveground storage tank (AST) that was utilized by Prime Tanning for storage of hazardous wastes from 1986 to 1997. According to the report, the wastes primarily consisted of mineral spirits and non-halogenated solvents. The AST was located in the Neutralization Plant, adjacent to School Street in the northern portion of Lot 146. This tank closure report is included in Appendix C.

MEDEP records included a "Phase I Environmental Site Assessment for Prime Tanning, Inc. – 20, 29, 34, and 35 Sullivan Street," completed by ENSR Corporation (ENSR) in October 2007 (2007 Phase I ESA). ENSR concluded that 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 property, were deemed RECs. According to deeds researched by ENSR, two parcels were purchased in the 1960s from Duffy's Oil Company (locations not specified in the report; however, the two parcels are likely a part of the main facility property) and an additional parcel was purchased that

contained a laundry building (part of the main facility property). Former potential uses of oil and dry cleaning chemicals on the Prime Tanning property were considered a REC. The former fuel oil and diesel USTs located on the main facility property were also considered a REC. The report states the former Blue Sort Building is considered a REC based on the potential industrial historic uses of the building since its construction in 1974.

Lastly, the report states that the Prime Tanning facility was connected to the municipal sewer system in the 1970s, but prior to that, process water from the main plant and associated buildings was likely discharged to the Salmon Falls River, and onsite residences possibly maintained private septic systems. Recommendations made in the 2007 Phase I ESA included researching archived files regarding the USTs formerly located on the main facility property and conducting a subsurface investigation to evaluate if soil and/or groundwater was negatively impacted by historical tannery, laundry, or oil handling operations and to address a potential septic system at the former Blue Sort Building (Prime Tanning warehouse). ENSR also recommended testing the sediment at the outfall in order to address historic process water discharges to the river. This previous Phase I ESA is included in Appendix C.

Prime Tanning sent a letter to Mr. Ed Vigneault of the MEDEP on September 10, 2008 notifying the MEDEP of their intention to close the Berwick, Maine facility. The letter states that since the facility was registered as a LQG of hazardous wastes, they would obtain proper certification of the closure process. With the letter, Prime Tanning provided a record of the 33 spills of hazardous and non-hazardous materials that occurred at the Prime Tanning facility from 1983 through 2008. This spill record is included in Appendix C.

A map of "Prime Tanning Company 2008 Hazardous Waste Storage Areas & Satellite Accumulation Areas" was included in the MEDEP records.

A Hazardous Waste Closure Plan (Closure Plan) was developed for the Prime Tanning site by Tewhey Associates (not dated) and was provided to the MEDEP for their review and approval on November 18, 2008. The Closure Plan stated that Prime Tanning planned to close the Berwick facility in November 2008 in accordance with MEDEP Chapter 851, Section 11 requirements, and consolidate manufacturing operations at their Hartland, Maine facility. According to the Closure Plan, the principal hazardous wastes generated at the Site during past operations included D001 ignitable wastes derived from mineral spirits and D007 chromium wastes. Mr. Vigneault of the MEDEP conducted site visits to the Prime Tanning plant in September and November 2008 to discuss planned closure activities. Prime Tanning obtained Tewhey Associates and Woodard & Curran to document and certify the site closure. The Closure Plan stated that MEDEP Residential Remedial Action Guidelines (RAGs) were proposed to be utilized for making remedial decisions during the closure activities. The planned work tasks stated in the Closure Plan included cleaning the internal floor trench system, assessment and remediation of the main and satellite hazardous waste storage areas, testing and remediation of the dye/dry weigh up rooms, shutdown and remediation of the wastewater treatment plant located at the main facility, locating and properly disposing of leather residue, completing an inventory, proper documentation, and shipment of remaining chemicals and chemical waste, and conducting a historical assessment and interviews.

The MEDEP approved the Closure Plan on November 20, 2008 with several conditions. One of the conditions included that Prime Tanning not only locate leather residue in all parts of the main facility property, but all areas of the site owned by Prime Tanning. Three addendums to the Closure Plan were completed to address MEDEP comments. Addendum No. 1 stated that there were no findings from interviewing two long-term employees of Prime Tanning that would suggest that waste material was ever intentionally disposed of on the Prime Tanning site. Addendum No. 1 also states that leather scraps were

sometimes temporarily stored on the northern portion of the main facility lot (south of Wilson Street) for pickup and would sometimes be covered by gravel fill. Addendum No. 2 outlines a proposed test pit program in the northern portion of Lot 146 and on Lot 133. The purpose of the test pit program was to determine if buried leather scraps were present on the site.

The test pit program in the northern portion of the main plant parcel and on Lot 133 was completed on February 11, 2009 and summarized in a letter report completed by Tewhey Associates, entitled, "Test Pit Program at Prime Tanning – Berwick," dated February 16, 2009. Representatives from Tewhey Associates, Prime Tanning, and the MEDEP (Ed Vigneault) were present during the investigation. A total of ten test pits (TP-1 through TP-10) were excavated on the site, including six on Lot 133 and four directly north of the main plant (south of Wilson Street). Soil samples were collected and field-screened with a photoionization detector (PID) during the investigation to assess the potential presence of VOCs in the soil. There were no VOC detections above 0.5 parts per million (ppm) in any of the soil samples. The letter report states that leather scraps or other foreign materials were not identified in the six test pits excavated on Lot 133 (TP-1 through TP-6). The subsurface materials observed in the Lot 133 test pits were characterized as natural soils or fill soils. The test pits were backfilled with the excavated material. While excavating the four test pits just north of the main facility (Lot 146), leather scraps were identified in three of these test pits (TP-7, TP-8, and TP-10). Two of the test pits (TP-7 and TP-10) contained a narrow layer of small pieces of leather at a depth of approximately 2.5-feet below ground surface (bgs). Test pit TP-8 contained a six to eight inch layer of leather scraps and leather pieces at a depth of approximately three feet bgs. Leather-free soils were observed above and below the leather debris-containing soils. The test pit program letter report and attached site plan showing locations of the test pits are included in Appendix C.

Following the February 2009 test pit program, a third Addendum was created for the Prime Tanning Closure Plan. Addendum No. 3 outlined an additional test pit program to evaluate the extent of subsurface leather debris in the vicinity of TP-8 located along the northern perimeter of the main facility (south of Wilson Street). The results of the additional test pit program are summarized in a letter report completed by Tewhey Associates, entitled, "Follow-Up Test Pit Program at Prime Tanning – Berwick," dated April 8, 2009. The follow-up investigation was conducted on April 6, 2009 and included the excavation of 13 additional test pits within the paved parking area of the main plant (Lot 146). Seven of the 13 test pits contained greater than six inches of deposits of leather scraps. The test pits containing leather deposits were observed to be largely similar with approximately 2.5-feet of fine light-brown sand fill beneath the asphalt pavement. Beneath the sand layer, a layer of dark brown to black leather scraps ranging in thickness from greater than one inch to 12 inches was observed. Dark gray to black clay deposits were observed beneath the leather scraps layer. Wood and metal debris was also observed with the leather deposits in some of the test pits. Depth to groundwater was observed to be 2.5 to three feet bgs, and the leather debris layer was partially to fully saturated in all the test pits. The area of the site where leather deposits were observed in a layer greater than two inches was estimated to be approximately 800 square yards. The estimated volume of the leather deposits was approximately 200 cubic yards with approximately 670 cubic yards of sand fill located above the leather deposits layer. The remediation plan proposed in the letter report involved the removal and onsite stockpiling of the asphalt and sand fill layers, the removal and off-site disposal of the leather debris, and the backfilling of the excavation with the sand fill and additional sand or gravel as needed. The follow-up test pit program letter report and site plan showing locations of the test pits are included in Appendix C.

On April 22–23, 2009, a leather remediation project was completed within the parking lot area directly north of the Prime Tanning main facility (Lot 146). According to Mr. Vigneault, approximately 400 tons of leather debris were removed from this area and disposed off-site.

Upon completion of the remediation project and additional hazardous waste closure tasks at the Prime Tanning site, Tewhey Associates and Woodard & Curran prepared a report titled, "Maine DEP Chapter 851, Section 11, RCRA Closure of the Prime Tanning Facility," dated May 2009 (Closure Report). The Closure Report summarizes a description and background of Prime Tanning, historic operations, previous site inspections and assessments, and hazardous waste closure activities. The Closure Report states all manufacturing operations ceased at the facility in December 2008. Chemicals were used at the plant for re-tanning, coloring, softening, water proofing, and processing of leather, and are described in the report. Hazardous wastes generated at the plant included high and low pH lab waste, flammable, off-specification, and unusable finish mixes, spent rags with solvents, waste mercury debris from thermometers and thermostats, chloroform, spent aerosol cans, dry chemical room floor sweepings, lime grit waste, and fluorescent light bulbs. The hazardous wastes stored at the Prime Tanning site were collected, transported, and disposed off-site by Ashland Inc. of Binghamton, New York. Clean Harbors conducted the site remediation during the site closure, which included cleaning and remediating floor drain systems and pipelines to the treatment plant, the former and recent chemical storage areas, and the wastewater treatment plant. Waste Management transported and disposed of the buried scrap leather that was excavated from the northern portion of the main facility parcel in April 2009. Tewhey Associates and Woodard & Curran conducted assessments and investigations throughout the site (including the previously mentioned test pit programs), and closure activities were completed within the main facility by Prime Tanning staff during the winter and spring of 2008 to 2009. Facility closure activities included cleaning and dismantling of dust venting and collection systems, disassembling and shipping tannery equipment and machinery to the Prime Tanning plant in Hartland, Maine, packaging and shipping unused leather treatment chemicals to the Hartland plant, removal of remaining hazardous materials and cleaning of storage rooms and satellite areas, removal of chemicals from onsite ASTs and proper disposal, and proper management of propane cylinders and universal wastes. Site closure of the Prime Tanning facility was certified by a Maine licensed professional engineer on May 20, 2009. Mr. Vigneault reviewed the closure documents and has stated that Prime Tanning appears to have met the requirements of MEDEP Chapter 851, Section 11, RCRA site closure. The Closure Report is included in Appendix C.

Additional records on file for Prime Tanning included miscellaneous correspondence between Prime Tanning and the MEDEP, EPA hazardous waste site information verification reports, and tracking information pertaining to hazardous wastes that were removed from the site and disposed off-site by licensed contractors during the closure activities conducted in 2009.

Ransom contacted Mr. Vigneault on June 4, 2010 for any updates pertaining to the Subject Property since Ransom's file review in June 2009. Mr. Vigneault stated that he sent a letter to Prime Tanning on July 1, 2009 which acknowledged that he reviewed the closure documents for the site, and closure activities appear to have met the appropriate requirements. A copy of Mr. Vigneault's acknowledgement letter is included in Appendix C. Mr. Vigneault indicated that he was not aware of any further activities that have been conducted on the Subject Property since the site's closure in 2009.

#### **4.3 PHYSICAL SETTING SOURCES**

##### **4.3.1 Topography**

The topography of the Subject Property is generally sloping downward to the south toward the Salmon Falls River. Based on the Somersworth, Maine USGS Quadrangle and data reported by EDR, the general elevation of the Subject Property is 182 feet above the National Geodetic Vertical Datum. The general topography of properties located near the Subject Property is generally sloping downward to the south toward the Salmon Falls River.

#### **4.3.2 Soils/Geology**

According to information provided in the EDR Report, soils in the vicinity of the Subject Property are identified by the U.S. Department of Agriculture (USDA) Soil Conservation Service (SCS) as Naumburg sand, Croghan loamy sand, or urban land. The soils are characterized as poorly to moderately well drained.

The EDR report states the depth to bedrock in the vicinity of the Subject Property can be as shallow as surface grade. Bedrock outcrops were not observed on the Subject Property during the site reconnaissance. The bedrock stratigraphic unit underlying the Subject Property and vicinity, as detailed in the EDR Report, is categorized as Eugeosynclinal deposits of the Paleozoic Era. The EDR Report is included in Appendix B.

As mapped by the Maine Geological Survey (MGS), surficial geology in the vicinity of the Subject Property consists of glaciomarine deposits, comprised of silt, clay, sand, and minor amounts of gravel as well as till, which consists of a heterogeneous mixture of sand, silt, clay, stones and may include many boulders. Bedrock in the vicinity of the Subject Property is mapped by MGS as feldspathic sandstone of the Berwick Formation.

Test pits were excavated in the northern portion of the main plant parcel (Lot 146) and on Lot 133 on February 11, 2009. The subsurface materials observed in the test pits were characterized as natural soils or fill soils. Six test pits were excavated on Lot 133. Significant leather scraps or other foreign materials were not identified in the six test pits excavated along the eastern side of the former parking lot (Lot 133). While excavating four test pits just north of the main facility, leather scraps were identified in three of these test pits. Two of the test pits contained a narrow layer of small pieces of leather at a depth of approximately 2.5-feet bgs. One test pit contained a six to eight inch layer of leather scraps and leather pieces at a depth of approximately three feet bgs. Leather-free soils were observed above and below the leather debris-containing soils. A follow-up investigation was conducted on April 6, 2009 and included the excavation of 13 additional test pits within the paved parking area north of the main plant (south of Wilson Street). Seven of the 13 test pits contained greater than six inches of deposits of leather scraps. The test pits containing leather deposits were observed to be largely similar with approximately 2.5-feet of fine light-brown sand fill beneath the asphalt pavement. Beneath the sand layer, a layer of dark brown to black leather scraps ranging in thickness from greater than one inch to 12 inches was observed. Dark gray to black clay deposits were observed beneath the leather scraps layer. Wood and metal debris was also observed with the leather deposits in some of the test pits. Refer to Section 4.2.4 (Maine Department of Environmental Protection) for further details pertaining to the test pit program.

One land use permit, dated September 1, 1993, provided Prime Tanning permission to gravel and level the northern portion of Lot 133.

#### **4.3.3 Surface Water Bodies/Floodplains**

The closest surface water body to the Subject Property is the Salmon Falls River, located approximately 1,200 feet south of the Subject Property.

Based on York County, Maine flood zone data provided by the Federal Emergency Management Agency (FEMA) and included in the EDR Report, the southern portion of the Subject Property (southern portion of Lot 146) is located within a 100-year flood zone (according to Flood Plain Panel 2301440006B). The remainder of the Subject Property is not located within a 100-year or 500-year flood zone.

Flood zones within the search area include 100-year and 500-year flood zones located to the south, west, and northwest of the Subject Property along the Salmon Falls River, and to the northeast along Ferguson Brook and Hall Ponds.

#### 4.3.4 Hydrogeology

Based on site observations, Subject Property topography, and information provided in the EDR Report, regional groundwater at the Subject Property is inferred to generally flow south toward the Salmon Falls River.

A subsurface investigation was completed on the main facility parcel (Lot 146) on April 6, 2009, and depth to groundwater was reported to be 2.5 to 3.0 feet bgs at that time.

#### 4.4 HISTORICAL USE INFORMATION FOR THE PROPERTY

The history of the Subject Property was researched to ascertain past use from the present back to the property's first developed use, or back to 1940, whichever was earlier. Reasonably ascertainable historical information sources researched in this assessment allowed uses of the Subject Property to be traced from the present back to 1877, at which time the Subject Property was developed with dwellings, L.R. Hersom's Tannery & Wool Pulling Works, S.P. Horn's Sash & Door Manufactory, Scott's Reed Manufactory, F.M. Clark's Carriage Manufactory, and L.M. & D.H. Nute's Shoe Manufactory. Historical research documentation, such as aerial photographs, Sanborn Fire Insurance Maps, and historical topographic maps are included in Appendix D. The following standard historical sources were reviewed by Ransom:

- Aerial photographs provided by EDR, dated 1951, 1973, 1977, 1986, 1992, and 2006;
- Sanborn Fire Insurance Maps provided by EDR, dated 1887, 1893, 1898, 1905, 1912, 1925, 1946, and 1965;
- Property tax files reviewed at the Town of Berwick Assessor's Office;
- City directories provided by EDR for the years 1961 and 1971;
- Historical topographic maps provided by EDR, dated 1893, 1944, 1958, 1973, and 1998;
- Historical map provided by the Town of Berwick, dated 1877;
- Code Enforcement records reviewed at the Town of Berwick;
- Zoning/land use records reviewed at the Town of Berwick;
- Historical records and previous environmental reports (listed below) reviewed at the Maine Department of Environmental Protection Bureau of Remediation and Waste Management File Room;
- Previous environmental report by Summit Environmental Consultants, Inc. entitled "Closure Certification for 5,000-Gallon Hazardous Waste Storage Tank, Prime Tanning Co., Inc.," dated October 1, 1997;
- Previous environmental report by ENSR Corporation entitled "Phase I Environmental Site Assessment for Prime Tanning Company, Inc., 20, 29, 34, and 35 Sullivan Street, Berwick, ME," dated October 2007;

- Previous environmental reports by Tewhey Associates entitled “Hazardous Waste Site Closure Plan,” “Addendum,” “Second Addendum,” and “Third Addendum,” not dated (completed in November 2008 through February 2009);
- Previous environmental report by Tewhey Associates entitled “Test Pit Program at Prime Tanning - Berwick,” dated February 16, 2009;
- Previous environmental report by Tewhey Associates entitled “Follow-Up Test Pit Program at Prime Tanning - Berwick,” dated April 8, 2009; and
- Previous environmental report by Tewhey Associates and Woodard & Curran entitled “Maine DEP Chapter 851, Section 11, RCRA Closure of the Prime Tanning Facility,” dated May 2009.

The following table is presented as a summary of the historical use of the Subject Property over time.

Year(s)	Property Use and Observed Details	Reference Source
Circa 1974 – Present	<p>Prime Tanning Co., Inc. main facility (currently vacant) located on Lot 146, Blue Sort Building, parking areas, and dwellings.</p> <p>According to the 2007 Phase I ESA, Prime purchased one parcel (presumed to be part of the existing Lot 146) in 1974 which contained a house, a barn, and a laundry facility at that time. No additional information pertaining to historic uses of this parcel was identified.</p>	<p>Site Observations, Berwick Assessor’s Office records; 1977, 1986, 1992, 1998, and 2006 Aerial Photographs; 1998 Topographic Map; 2007 Phase I ESA</p>
1973	Tannery facility, former lumber facility building, dwellings, and Wilson, Jordan, and Sullivan Streets visible in historical aerial photograph and topographic map.	1973 Aerial Photograph; 1973 Topographic Map
1965	<p>Prime Tanning Co. Tannery (facility significantly expanded since 1946 Sanborn Map and includes the factory, hide storage, coloring room, finishing room, tan house, office, dust collector, dust house, oil and water tanks identified in the northwestern portion of the facility, and a parking lot), the L.J. Normand &amp; Sons Building Materials &amp; Lumber facility, dwellings and associated garages.</p> <p>According to the 2007 Phase I ESA, Prime purchased two parcels (presumed to be part of the existing Lot 146) in 1962 from Duffy’s Oil Co. No additional information pertaining to historic uses of the parcels by the oil company was identified.</p>	1965 Sanborn Map; 2007 Phase I ESA
1958	Tannery facility, lumber facility, dwellings, and Wilson, Jordan, and Sullivan Streets are depicted on the historical topographic map.	1958 Topographic Map
1951	Tannery facility and adjacent streets are visible in historical aerial photograph.	1951 Aerial Photograph

<b>Year(s)</b>	<b>Property Use and Observed Details</b>	<b>Reference Source</b>
1946	Prime Tanning Co. Tannery (facility significantly expanded since 1925 Sanborn Map), hide storage building, storage building, the L.J. Normand & Sons Building Materials & Lumber facility, and dwellings and associated garages.	1946 Sanborn Map
1944	The tannery facility, planing mill, and Wilson, Jordan, and Sullivan Streets are depicted on the historical topographic map.	1944 Topographic Map
1925	Lennox-Nagle Leather Company Tannery (includes tannery, boiler room, engine room, and coal bin), storage building, hide storage building, the M. Goodwin Planing Mill, dwellings and associated garages, and stables.	1925 Sanborn Map
1912	Tannery buildings (vacant in 1912), storage buildings, a carpenter shop, the M. Goodwin Planing Mill (includes planing, sawing, and storage areas), dwellings, and stables.	1912 Sanborn Map
1905	Littlefield Leather Company (includes tanning, finishing, drying, and storage areas and an engine room), a hide house, an office, stables, the Mathews Brothers Planing Mill (includes sawing, planing, and storage areas), old iron storage, and dwellings.	1905 Sanborn Map
1898	L.R. Herson & Son Tannery (includes grinding, tanning, finishing, drying, storage and tacking areas and an engine room), a hide house, an office, stables, the W.D. Clark & O.F. Davis heel shop and storage building, old iron storage, and dwellings.	1898 Sanborn Map
1893	L.R. Herson & Son Tannery (includes grinding, tanning, finishing, drying, storage and tacking areas and an engine room), a hide house, an office, stables, the Somersworth Savings Bank Property, and dwellings.	1893 Sanborn Map; 1893 Topographic Map
1887	L.R. Herson & Son Tannery (includes grinding, tanning, finishing, drying, storage and tacking areas and an engine room), a hide house, dwellings, an office, stables, L.M. & D.H. Nute's Shoe Manufactory, and dwellings.	1887 Sanborn Map
1877	Dwellings, L.R. Herson's Tannery & Wool Pulling Works, S.P. Horn's Sash & Door Manufactory, Scott's Reed Manufactory, F.M. Clark's Carriage Manufactory, and L.M. & D.H. Nute's Shoe Manufactory.	1877 Map provided by the Town of Berwick

The main facility parcel (Lot 146) was historically occupied by a tannery facility and other industrial occupants since prior to 1877. In addition, parcels purchased by Prime Tanning over time (now part of the existing Lot 146) were historically operated by an oil company (prior to 1962) and a laundry facility (prior to 1974).

The historic use, storage, and identified and potential releases of oil and hazardous materials associated with former operations conducted at the tannery facility, the former oil company and the former laundry facility, appear to represent environmental concerns to the Subject Property.

Historic uses of Lot 130 include a shoe factory from at least 1877 to the 1890s, a building materials and lumber company from the early 1900s to the 1970s, and a warehouse (the former Blue Sort Building) operated by Prime Tanning since 1974. Potential industrial operations involving oil and/or hazardous materials within the former Prime Tanning Blue Sort Building may represent an environmental concern to the Subject Property. The historic industrial uses of this property as a shoe factory and lumber company may also represent environmental concerns to the Subject Property.

Lot 133 has historically consisted of primarily dwellings, a stable, a parking lot, personnel offices for Prime Tanning employees, and a garage. According to a property card provided by the Town of Berwick Assessor's Office, dated 1979 through 1985, the garage was noted as "old" and used for storage. According to the Town of Berwick Code Enforcement records, the garage was demolished around 2004. Given the limited information available for historic uses of the former garage building, the former garage may represent an environmental concern to the Subject Property.

Lot 95 has historically been utilized for residential purposes, which does not appear to represent an environmental concern to the Subject Property.

#### 4.5 HISTORICAL USE INFORMATION FOR ADJOINING PROPERTIES

Historical uses of the adjoining properties are presented in the table below and were identified in the standard historical sources listed above during the course of researching the Subject Property.

Year(s)	Property Use and Observed Details	Reference Source
<b>North</b>		
Present	Goodwin Street, Sullivan Street, Wilson Street, residences, a commercial office building, a public school property, police station, a garage, and a Methodist Church	Site Observations, Berwick Assessor's Office Records
1973 – 1998	Wooded land and several structures (appear to be residences) are visible on Sullivan and Wilson Streets in historical aerial photographs and topographic maps. The high school is depicted to the northeast, and a substation is depicted to the north on the historic topographic maps.	1973, 1977, 1986, 1992, and 1998 Aerial Photographs; 1973 and 1998 Topographic Maps
1958 – 1965	Dwellings on Sullivan and Wilson Streets, a garage on Wilson Street, a feed store, and undeveloped land. Further north is a transformer yard on the corner of Sullivan and Thelma Streets (substation depicted on 1958 topographic map). The high school is depicted to the northeast of the Subject Property on the 1858 topographic map.	1965 Sanborn Map; 1958 Topographic Map

<b>Year(s)</b>	<b>Property Use and Observed Details</b>	<b>Reference Source</b>
1912 – 1946	Dwellings on Sullivan Street and Wilson Streets, a garage on Wilson Street, an Advent Church, and undeveloped land	1912, 1925, and 1946 Sanborn Maps; 1951 Aerial Photograph; 1944 Topographic Map
1893	Vicinity north of the Subject Property is depicted as fairly undeveloped in historical topographic map	1893 Topographic Map
1877	Undeveloped forestland	1877 Map provided by the Town of Berwick
<b>South</b>		
Present	Sullivan Street, Back Street, and Sawmill Hill Road, beyond which is a gas station, and commercial and residential properties. The Subject Property is bordered to the southeast by School Street, beyond which are the Town of Berwick Fire Department; a commercial office building; and a bank building.	Site Observations, Berwick Assessor's Office Records
1951 – 1998	Vicinity south of the Subject Property appears highly developed with primarily residential and commercial properties in historical aerial photographs and topographic maps. The existing gas station south of the site is visible in the 1998 and 2006 aerial photographs, and a structure similar to the existing structure is visible in the earlier aerial photographs.	1958, 1973, and 1998 Topographic Maps; 1951, 1973, 1977, 1986, 1992, 1998, and 2006 Aerial Photographs
1893 – 1944	Vicinity south of the Subject Property is depicted as developed in historical topographic maps	1893 and 1944 Topographic Maps
1877	Primarily residential and commercial properties are depicted south of the Subject Property	1877 Map provided by the Town of Berwick
<b>East</b>		
Present	School Street, residential properties, and a wastewater pump station	Site Observations; Berwick Assessor's Office records
1893 – Present	Land east of the Subject Property was historically primarily residential; dwellings and associated garages are shown on historic maps, beyond which is School Street	1912, 1925, 1946, and 1965 Sanborn Maps; 1951, 1973, 1977, 1986, 1992, 1998, and 2006 Aerial Photographs; 1893, 1944, 1958, 1973, and 1998 Topographic Maps
1877	High School House, Methodist Church, and dwellings, beyond which is School Street	1877 Map provided by the Town of Berwick
<b>West</b>		
Present	Sullivan Street, the Berwick Town Hall, a vacant parcel owned by the Maine D.O.T., a parking lot, residential properties, and the Knights of Pythias lodge	Site Observations; Berwick Assessor's Office records

<b>Year(s)</b>	<b>Property Use and Observed Details</b>	<b>Reference Source</b>
1973 – 2006	Land west of the Subject Property is depicted as highly developed on the historic topographic map; Town Hall is depicted west of the site. Residential and commercial properties are visible west of the Subject Property in historic aerial photographs.	1973 and 1998 Topographic Maps; 1973, 1977, 1986, 1992, 1998, and 2006 Aerial Photographs
1951 – 1965	Sullivan Street, dwellings and associated garages, Town Hall, wood working facility, a saw mill, and a club.	1965 Sanborn Map; 1958 Topographic Map; 1951 Aerial Photograph
1925 – 1946	Sullivan Street, dwellings, stables, coal sheds, the Rochester Street School, and a blacksmith	1925 and 1946 Sanborn Maps; 1944 Topographic Map
1905 – 1912	Sullivan Street, dwellings, stables, a school house, and a wood sawing facility	1905 and 1912 Sanborn Maps
1898	Sullivan Street, dwellings, stables, a public school, a store house, and a wood sawing facility	1898 Sanborn Map
1887 – 1893	Sullivan Street, dwellings, stables, a public school, a livery, and a harness shop	1887 and 1893 Sanborn Maps; 1893 Topographic Map
1877	Primarily residential and commercial properties are depicted west of the Subject Property	1877 Map provided by the Town of Berwick

Historic land uses of properties located north of the Subject Property consisted of primarily residential and commercial properties or undeveloped land. However, the transformer yard historically located north of the Subject Property and the garage located to the northeast may represent environmental concerns to the Subject Property.

Historic land uses of properties located south of the Subject Property were primarily residential and commercial uses. The gas station located south of the Subject Property is presumed to be downgradient of the site, and therefore is not anticipated to represent a threat to the environmental condition of the Subject Property.

Land east of the Subject Property was historically occupied by residential properties, which do appear to represent an environmental concern.

Historic land uses of properties west of the Subject Property were also primarily commercial, residential, and industrial. The former saw mill, wood working facility, blacksmith, and coal sheds formerly located on properties west of the site may represent an environmental concern to the Subject Property.

## **5.0 SITE RECONNAISSANCE**

On May 17, 2010, Ransom conducted a reconnaissance of the Subject Property. Mr. Wayne Chasse, former Facility Engineer for Prime Tanning Company and employee for over 20 years, and representatives of MEDEP, accompanied Ransom during the site visit. A photograph log is included in Appendix E.

### **5.1 METHODOLOGY AND LIMITING CONDITIONS**

The Subject Property reconnaissance included observations of the site grounds for the identification or evidence of releases, or potential releases of oil and hazardous materials (OHM), or a material threat of releases of OHM. Weather conditions at the time of the site reconnaissance were mostly sunny with a temperature of approximately 70 degrees Fahrenheit.

### **5.2 GENERAL SITE SETTING AND OBSERVATIONS**

The Subject Property is comprised of four parcels which consist of the former Prime Tanning facility (Lot 146), the former Prime Tanning Blue Sort Building (Lot 130), a former Prime Tanning employee parking lot (Lot 133), and an unimproved grass lot (Lot 95).

The Prime Tanning facility is currently vacant. Remaining process equipment has been decommissioned, and the majority of the equipment and materials have been removed from the facility. Prime Tanning completed the required hazardous waste site closure activities in 2009 (refer to Section 4.2.4), and hazardous materials and hazardous wastes were removed from the site at that time.

Historically, blue stock hides were delivered to the former Blue Sort Building where sorting, splitting, and shaving activities were conducted. The hides were subsequently transported to the main facility for further processing. Former processes conducted in the main facility included coloring, re-tanning, drying, coating, stuffing, buffing, trimming, and other miscellaneous treatment based on product specifications. Shipping, receiving, chemical storage (tank farm, process tanks, and drum storage), and wastewater pretreatment were also conducted at the tannery facility.

According to the Berwick Assessor's Office, the Prime Tanning facility encompasses a footprint of approximately 248,800 square feet. The facility was constructed in several phases over time, and is generally constructed of concrete block walls and concrete slab or wooden floors. The majority of the facility consists of two stories. The remainder of the parcel consists of paved driveway/parking areas and grass areas. A large gravel area was observed in the parking lot north of the main facility (south of Wilson Street). This area is the location of the leather remediation project that was conducted as part of site closure activities (refer to Section 4.2.4).

The former Blue Sort Building located on Lot 130 is a one-story warehouse and encompasses approximately 14,341 square feet. The warehouse building has a concrete slab-on-grade foundation and a steel frame. The building was also vacant at the time of the site reconnaissance; however, some remaining equipment was observed.

The former paved employee parking lot is located in the southern portion of Lot 133. Grass areas, overgrown vegetation, and wooded areas covered the northern portion of Lot 133. A drainage swale (culverted stream in areas) runs along the parking lot's eastern perimeter and continues south through the main facility parcel. Evidence of test pits advanced on the Subject Property during previous environmental investigations was observed along the eastern border of the parking lot parcel (Lot 133).

Refer to the attached Site Plan (Figure 2) for locations of key site features.

### **5.2.1 Hazardous Substances and Petroleum Products**

#### Main Facility

One 20,000-gallon No. 6 oil AST was observed adjacent to the boiler room in the northwestern portion of the main facility. No significant staining was observed on the tank or the concrete floor below. According to Mr. Chasse, the AST had been drained as part of the site's hazardous waste closure. The 20,000-gallon AST replaced two former ASTs historically located in the same area.

A secondary containment structure surrounding an approximately 5,000-gallon formic acid AST was observed on the first floor in the eastern portion of the main facility. The tank was not visible; however, staining was not observed on the walls of the secondary containment structure.

A lime silo and an approximately 180,000-gallon process water/neutralization tank are located within the neutralization plant. The neutralization plant is located on an adjacent parcel owned by the Berwick Sewer District and also occupied by a wastewater pumping station; however, the neutralization plant was assessed as part of Prime Tanning's main facility. Lime was historically added to the wastewater for pH adjustment. A lime slurry was made up at the plant and filtered, and lime grit was formerly disposed as a hazardous waste. Mr. Chasse indicated the plant generated approximately one 55-gallon drum of lime grit in the last few years.

The secondary containment structure associated with two former approximately 5,000-gallon aluminum chloride ASTs was observed southwest of the neutralization plant. The two ASTs were removed from the site after the tannery facility was shut down.

An approximately 250-gallon aluminum chloride tank was observed inside the neutralization plant. Aluminum chloride was formerly used as a flocculent.

A tank farm was observed on the first floor in the northern portion of the main facility building. A total of 19 ASTs, ranging in size from approximately 2,500-gallons to 4,500-gallons were observed. Mr. Chasse indicated that all of these tanks had been drained as part of site closure activities. The tank farm consisted of process chemicals utilized in the tannery operations, including three Wattle (bark extract) ASTs, two Relugan RE (resin filler) ASTs, two Marden 20 ASTs, three Biosoft 680 ASTs, two Leukotan 1084 ASTs, one Chemtan T-15 AST, one Quebracho (bark extract) AST, one Mardon 20 AST, two Chemtran E-33 ASTs, and two DX-902 ASTs. The tanks appeared to be in good condition with no evidence of leaks or staining observed.

A propane tank was observed located north of the neutralization plant. The tank appeared to be in good condition.

Two 55-gallon drums of oil and approximately ten 55-gallon drums of process chemicals (empty or partially full) were observed in the shipping area located within the northeastern portion of the main facility on the first floor. The drums were stored on pallets or directly on the concrete floor and appeared to be in good condition at the time of the site reconnaissance with no leaks or staining observed.

Approximately eight 55-gallon drums were observed in the carpenter shop located in the southeastern portion of the main facility. The drums were observed to contain miscellaneous solid waste or parts and equipment.

Four 55-gallon drums of boiler feed water treatment chemicals were observed stored on pallets in the boiler room. The drums appeared to be in fair condition at the time of the site reconnaissance with some staining observed on and in the vicinity of the drums.

Approximately 25 five-gallon buckets of roof coating and approximately five three-gallon buckets of mastic were observed being stored on the first floor in the carpenter shop. Approximately four five-gallon buckets of fire prevention chemicals were observed on the second floor of the carpenter shop.

Miscellaneous unlabelled buckets and small containers containing maintenance materials were observed throughout the carpenter shop.

Several hazardous waste storage areas were observed throughout the Subject Property during the site reconnaissance and are listed below. The hazardous wastes were removed from the Subject Property during site closure activities.

- A hazardous waste storage area and a non-regulated hazardous waste storage area were observed located on first floor near the blue stock storage area in the southern portion of the main facility building.
- A satellite hazardous waste storage area was observed in the mixing room located on the first floor in the southwestern portion of the main facility building. Staining was observed in this area.
- A satellite hazardous waste storage area was observed in the finishing area located in the northeastern portion of the main facility building. Limited staining was observed on the floor in this area.
- Two satellite hazardous waste storage areas were observed in the sample storage area located west of the mixing room. According to Mr. Chasse, spray paint cans and mixing chemicals were stored in these two areas.
- Three satellite hazardous waste storage areas were observed in the laboratory located on the second floor of the main facility building. The storage areas were empty at the time of the site reconnaissance with limited staining observed.

The dust generated during buffing operations conducted in the basement in the northeastern portion of the main facility building was historically bagged and disposed of as special waste. Leather scraps and trimmings generated during tannery operations were stored in the trimmings storage area located in the southeastern portion of the site. The leather trimmings were historically disposed of off-site as special waste.

Suspect asbestos-containing building materials were observed on the Subject Property in the form of thermal system insulation, including tank insulation, transite panels, and floor tiles. Based on the age of the building, lead-based paint may also be present within the former tannery facility.

### Blue Sort Building

Fill and vent pipes associated with an approximately 3,000-gallon No. 2 fuel oil AST were observed along the northern exterior wall of the former Blue Sort Building. The tank room was locked at the time of the site reconnaissance and not able to be observed. Oil staining was observed on and in the vicinity of the fill pipe.

An oil storage area was observed inside the former Blue Sort Building. No oils were observed being stored in this area at the time of the site reconnaissance; however, lubricating oil, hydraulic oil, and recycled oil were formerly stored in this location. Staining was observed on the concrete floor in this area.

The scrap leather dust generated during shaving activities formerly conducted within the former Blue Sort Building was historically transported and disposed by Waste Management.

## **5.2.2 Storage Tanks**

### Underground Storage Tanks (USTs)

No evidence (i.e., fill or vent pipes, access ways) indicating the presence of an existing UST was observed on the Subject Property during the site reconnaissance. Five USTs were formerly maintained on the Subject Property (refer to Section 4.1.1).

### Aboveground Storage Tanks (ASTs)

One 20,000-gallon No. 6 oil AST was observed adjacent to the boiler room in the northwestern portion of the main facility. According to Mr. Chasse, the AST had been drained as part of the site's hazardous waste closure. The 20,000-gallon AST replaced two former ASTs historically located in the same area. No significant staining was observed on the tank or the concrete floor below the tank. Approximately 10 gallons of No. 6 oil were observed on the concrete floor in the boiler room. The oil appears to have been released when the boilers were decommissioned.

A secondary containment structure surrounding an approximately 5,000-gallon formic acid AST was observed on the first floor in the eastern portion of the main facility. The tank was not visible; however, staining was not observed on the walls of the secondary containment structure.

A lime silo and an approximately 180,000-gallon process water/neutralization tank are located within the neutralization plant. The neutralization plant was assessed as part of Prime Tanning's main facility; however, the neutralization plant is located on an adjacent parcel (Lot 148) owned by the Berwick Sewer District. Lime was historically added to the wastewater for pH adjustment. A lime slurry was made up at the plant and filtered, and lime grit was formerly disposed as a hazardous waste. Mr. Chasse indicated the plant generated approximately one 55-gallon drum of lime grit in the last few years.

The secondary containment structure associated with two former approximately 5,000-gallon aluminum chloride ASTs was observed southwest of the neutralization plant. The two ASTs were removed from the site after the tannery facility was shut down.

An approximately 250-gallon aluminum chloride tank was observed inside the neutralization plant. Aluminum chloride was formerly used as a flocculent.

A tank farm was observed on the first floor in the northern portion of the main facility building. A total of 19 ASTs, ranging in size from approximately 2,500-gallons to 4,500-gallons were observed. Mr. Chasse indicated that all of these tanks had been drained as part of site closure activities. The tank farm consisted of process chemicals utilized in the tannery operations, including three Wattle (bark extract) ASTs, two Relugan RE (resin filler) ASTs, two Marden 20 ASTs, three Biosoft 680 ASTs, two Leukotan 1084 ASTs, one Chemtan T-15 AST, one Quebracho (bark extract) AST, one Mardon 20 AST, two Chemtran E-33 ASTs, and two DX-902 ASTs. The tanks appeared to be in good condition with no evidence of leaks or staining observed. The fill pipes for these ASTs were observed along the northwestern exterior wall of the main facility building. A drain with a shut-off valve was observed in near the fill pipes.

A propane tank was observed located north of the neutralization plant. The tank appeared to be in good condition.

Fill and vent pipes associated with an approximately 3,000-gallon No. 2 fuel oil AST were observed along the northern exterior wall of the former Blue Sort Building. The tank room was locked at the time of the site reconnaissance and not able to be observed. Oil staining was observed on and in the vicinity of the fill pipe.

Several process tanks were also observed during the site reconnaissance, including hot water tanks, river water tanks, and mixing tanks. Approximately eight mixing drums were observed in the coloring area of the main facility (first floor). The drums were formerly utilized for coloring/dyeing. Dyes formerly used in drums included powdered chrome and formic acid. Wastewater from the drums was discharged to the floor drains in the area, and staining was observed on the floor in this area. The floor drains were reportedly connected to the neutralization plant, which ultimately discharges to the sanitary sewer system.

### **5.2.3 Odors**

No strong, pungent, or noxious odors were noted on the Subject Property during the site reconnaissance.

### **5.2.4 Pools of Liquid**

Standing water was observed near the loading dock located east of the main facility building. According to Mr. Chasse, a drain is located in the vicinity of the loading dock; however, a shut-off valve was installed on the drain line that was historically closed during deliveries in order to contain any potential releases of oil or hazardous materials. The drain appears to have been closed or clogged during the site reconnaissance. A shean was not observed on the standing water in the loading dock area at the time of the site reconnaissance.

Standing water was observed in a floor trench located in the wet weigh up room (eastern portion of the main facility building). A shean was observed on the standing water.

### 5.2.5 Drums

Two 55-gallon drums of oil and approximately ten 55-gallon drums of process chemicals (empty or partially full) were observed in the shipping area located within the northeastern portion of the main facility on the first floor. The drums were stored on pallets or directly on the concrete floor and appeared to be in good condition at the time of the site reconnaissance with no leaks or staining observed.

Approximately eight 55-gallon drums were observed in the carpenter shop located in the southeastern portion of the main facility. The drums were observed to contain miscellaneous solid waste or parts and equipment.

Four 55-gallon drums of boiler feed water treatment chemicals were observed stored on pallets in the boiler room. The drums appeared to be in fair condition at the time of the site reconnaissance with some staining observed on and in the vicinity of the drums.

An oil storage area was observed inside the former Blue Sort Building. No oils were observed being stored in this area at the time of the site reconnaissance; however, lubricating oil, hydraulic oil, and recycled oil were formerly stored in this location. Staining was observed on the concrete floor in this area.

### 5.2.6 Unidentified Substance Containers

Miscellaneous unlabelled buckets and small containers (less than one gallon) were observed throughout the carpenter shop that appeared to contain maintenance materials.

### 5.2.7 Polychlorinated Biphenyls (PCBs)

#### Transformers

Three pad-mounted transformers were observed within a fenced area along the eastern wall of the main facility. The transformers appeared to be in good condition at the time of the site reconnaissance. According to Mr. Chasse, three former pad-mounted transformers were historically located north of the existing transformers.

One pole-mounted transformer was observed in the central portion of the main facility parcel, east of the building. The transformer appeared discolored and in fair to poor condition at the time of the site reconnaissance.

Three pole-mounted transformers were observed located northeast of the neutralization plant. The transformers appeared to be in good condition with no evidence of leaks or staining observed.

One pad-mounted transformer was observed along the northern exterior wall of the main facility building. The transformer appeared to be in good condition with no evidence of leaks or staining observed.

One pole-mounted transformer was observed on a utility pole located adjacent to the northeastern perimeter of Lot 146 on Wilson Street. The transformer appeared to be in good condition with no evidence of leaks or staining observed.

Four pole-mounted transformers were observed on utility poles adjacent to the western perimeter of the main facility parcel along Sullivan Street. The transformers appeared to be in good condition with no evidence of leaks or staining observed.

Three pole-mounted transformers were observed on a utility pole adjacent to the western perimeter of Lot 133 along Sullivan Street. The transformers appeared to be in good condition, and no staining or evidence of releases were observed.

#### Other

A hydraulic lift was observed adjacent to the shipping department loading dock. Additional hydraulic equipment was historically utilized in the main facility building as part of former tannery operations. It is possible that hydraulic equipment historically operated at the Subject Property may have utilized oil containing PCBs in the past.

Based on the age of the building, suspect PCB-containing building materials, such as window caulking, may be present in the former tannery facility.

Fluorescent light ballasts potentially containing PCBs are a non-scope consideration for the purposes of this ESA.

### **5.3 INTERIOR OBSERVATIONS**

#### **5.3.1 Heating/Cooling**

The main facility building was formerly heated with steam generated onsite by three oil-fired boilers. No. 6 oil was formerly stored in one 20,000-gallon AST located adjacent to the boiler room.

The former Blue Sort Building was formerly heated with an oil-fired furnace and a forced hot air. No. 2 fuel oil was stored within a 3,000-gallon AST located in a locked room within the northern portion of the building.

Refer to Section 5.2.2 for observations of the ASTs associated with the heating systems at the main facility building and the Blue Sort Building.

#### **5.3.2 Stains or Corrosion**

Several areas of staining were observed on the floors and walls throughout the former tannery facility at the time of the site reconnaissance. The majority of the stains appeared to be due to numerous small releases over time associated with the facility's historic industrial use.

Some staining was observed on the concrete floor throughout the drying and finishing areas on the first floor in the northern portion of the main facility building.

Some staining was observed on the floor and walls in the stuffing area where wet leather was historically heated and impregnated with hot grease. The stuffing area is located on the first floor in the eastern portion of the main facility building. Hot grease was historically heated on a conveyor with steam coils in this area.

Staining was observed on the floor in the dry weigh up room located on the first floor in the southeastern portion of the main facility building. Dry chemicals used for coloring were historically stored and weighed in this area.

Staining was observed on the floor in the wet storage room located on the first floor in the southeastern portion of the main facility building. Drums of wet chemicals were stored on an asphalt floor in this area. The floor was observed to be in poor condition at the time of the site reconnaissance.

Some staining was observed on the floor in the coloring room in vicinity of the former wooden mixing drums. Dyes, including powdered chrome and formic acid, were historically used within the wooden drums and discharged to the adjacent floor trenches.

Approximately 10 gallons of No. 6 oil were observed on the floor in the boiler room located in the northwestern portion of the main facility building. The No. 6 oil appears to have been spilled when the boilers were decommissioned. The oil appeared to be contained on the concrete floor in this area.

Some staining was observed on the concrete floor in the maintenance area located west of the boiler room

Staining was observed in the vicinity of the black dye scale located near the virgin drum storage and mixing room. Staining was also observed on the floor and the walls of the mixing room.

Staining was observed on the floor and select shelves in the research and development area located in the northwestern portion of the main facility building.

Staining was observed in the former oil storage area on the concrete floor in the former Blue Sort Building. Limited staining was also observed in the vicinity of the oil-fired furnace in the former Blue Sort Building. The fill pipe associated with the 3,000-gallon No. 2 fuel oil AST located at the Blue Sort Building was observed to be stained at the time of the site reconnaissance.

### **5.3.3 Drains and Sumps**

Several floor drains and trenches were observed throughout the first floor of the main facility building. According to Mr. Chasse, the floor drains and trenches are connected to the site's wastewater pretreatment system. The site's pretreatment system neutralizes the process wastewater prior to discharging to the municipal wastewater system. The pretreatment system included a neutralization tank, a lime silo, and aluminum chloride ASTs. Lime was added to the wastewater to adjust the pH, and the aluminum chloride was added to the wastewater for flocculation purposes. According to Mr. Chasse, the site's pretreatment system has operated since the 1970s. The site's pretreatment/neutralization plant was assessed as part of Prime Tanning's main facility; however, the neutralization plant is located on an adjacent parcel (Lot 148) owned by the Berwick Sewer District and also occupied by a wastewater pump station.

Several catch basins were observed throughout exterior portions of the main facility parcel and along the neighboring streets. The catch basins are connected to the municipal storm water system.

Two drains are located in the delivery areas of the main facility parcel, including the main loading dock located east of the facility building, and a truck off-loading station located in the northwestern portion of the main facility. The drains discharge to the drainage swale that extends along the eastern perimeter of Lot 133 and south through the main facility parcel.

Both drains are equipped with shut-off valves that were historically closed during deliveries in order to contain any potential releases of oil or hazardous materials.

A sump was observed in the buffing area of the basement in the main facility building. According to Mr. Chasse, water was pumped from this sump and discharged outside the building. The sump pump was installed as part of the site closure activities to keep the vacant building dry.

#### **5.4 EXTERIOR OBSERVATIONS**

##### **5.4.1 Pits, Ponds or Lagoons**

No pits, ponds or lagoons were observed on the Subject Property during the site reconnaissance.

##### **5.4.2 Stained Soil or Pavement**

Stained soil was observed beneath the fill pipe associated with the 3,000-gallon No. 2 fuel oil AST located within the northern portion of the former Blue Sort Building.

*De minimis* staining from parked cars was observed on the Subject Property during the site reconnaissance.

##### **5.4.3 Stressed Vegetation**

No stressed vegetation, indicative of a release of OHM, was observed on the Subject Property during the site reconnaissance.

##### **5.4.4 Solid Waste**

###### Fill Material

Evidence of fill materials suggesting trash, construction debris, demolition debris, or other solid waste disposal were not observed on the Subject Property at the time of the site reconnaissance.

Leather scraps/debris was historically buried in the parking area located north of the main facility building (south of Wilson Street). A Leather Remediation Project was completed as part of the site closure activities in 2009 (refer to Section 4.2.2), and approximately 400-tons of leather debris-containing soil were removed and properly disposed off-site. This area was subsequently backfilled with clean soils. It is possible that leather scraps/debris were historically buried on other areas of the Subject Property.

Based on a land use permit maintained in the Town of Berwick Code Enforcement file for the Subject Property, Prime Tanning was given approval to gravel and level the back land of the existing parking lot (the northern portion of the Subject Property) in 1993.

The western portion of Lot 133, adjacent to the northwest corner of the parking lot, is at a higher elevation than the remainder of the parcel and appears to have been filled and graded. Based on a site plan included in the Town of Berwick Code Enforcement file for this parcel, this mounded area appears to have been the location of an old shed/garage that was demolished around 2004.

## Dumpsters

One trash compactor was observed near the main loading dock east of the main facility building. Two Waste Management roll-off dumpsters were observed within the paved driveway area east of the main facility building. One dumpster was also observed on the paved ground surface located adjacent to the southwestern exterior wall of the main facility building (appears to have been associated with the adjacent commercial properties).

One solid waste roll-off container was observed on the paved surface in the northeastern portion of the former employee parking lot located on Lot 133. One end of the container was labeled as "plastic only," and the other end was labeled as "leather dust." The disposal company listed on the side of the roll-off container is MM Solid Waste Equipment, Inc. out of Dover, New Hampshire. Plastic debris was observed in the vicinity of the roll-off container. No staining was observed on the ground surface in the vicinity of the container.

One trash compactor was observed along the southwestern exterior wall of the former Blue Sort Building.

## Other

Miscellaneous solid waste, including pallets and metal debris, was observed in a grass area located in the southern portion of Lot 146.

Miscellaneous solid waste, including an old tire, metal debris, pallets, pieces of concrete, and general litter, was observed within the northern portion of the former employee parking lot (Lot 133) and along the drainage swale located on the eastern perimeter of Lot 133.

### **5.4.5 Wastewater**

Wastewater is not currently generated at the Subject Property. Historically, process wastewater was discharged to Prime Tanning's pretreatment plant prior to being discharged to the municipal wastewater system. The pretreatment plant operated on the Subject Property since the 1970s. The site's pretreatment/neutralization plant was assessed as part of Prime Tanning's main facility; however, the neutralization plant is located on an adjacent parcel (Lot 148) owned by the Berwick Sewer District and also occupied by a wastewater pump station.

Storm water would likely follow the topography of the ground surface at the Subject Property (via overland flow) and discharge to catch basins located on the Subject Property or within adjacent streets. A drainage swale (culverted stream) was observed along the eastern perimeter of Lot 133. The drainage swale extends south and transects the main facility parcel (Lot 146). The drainage swale is primarily located underneath the former tannery building. One access point to the swale was observed northwest of the carpenter shop (in the southeastern portion of the Subject Property). The swale was covered with a metal grate in this location.

Two drains are located in the delivery areas of the main facility parcel, including the main loading dock located east of the facility building, and a truck off-loading station located in the northwestern portion of the main facility. The drains discharge to the drainage swale that extends along the eastern perimeter of Lot 133 and south through the main facility parcel. Both drains are equipped with shut-off valves that were historically closed during deliveries in order to contain any potential releases of oil or hazardous materials.

#### **5.4.6 Wells**

No wells were observed on the Subject Property at the time of the site reconnaissance.

#### **5.4.7 Septic Systems**

Neither septic systems nor cesspools were observed on the Subject Property during the site reconnaissance.

## **6.0 INTERVIEWS**

Ransom interviewed the following entities/individuals in an effort to obtain information indicating potential RECs in connection with the Subject Property. Mr. Wayne Chasse, former Facility Engineer for Prime Tanning Company, completed a User Questionnaire for the Subject Property (Appendix A).

### **6.1 PAST AND PRESENT SUBJECT PROPERTY OWNERS**

Mr. Wayne Chasse, former Facility Engineer and representative for Prime Tanning Company, was interviewed on May 17, 2010. Information provided by Mr. Chasse has been included throughout pertinent sections of this report.

### **6.2 SUBJECT PROPERTY MANAGER**

The Subject Property is currently vacant; therefore, a property manager does not currently exist for the site. However, Mr. Chasse, former Facility Engineer, was interviewed on May 17, 2010, and information provided by Mr. Chasse has been included throughout pertinent sections of this report.

### **6.3 SUBJECT PROPERTY OCCUPANTS**

The Subject Property is currently vacant; therefore, there are no Subject Property occupants to be interviewed as part of this Phase I ESA.

### **6.4 LOCAL GOVERNMENT OFFICIALS**

#### **6.4.1 Fire Department**

On June 4, 2010, Ransom contacted the Town of Berwick Fire Department for information pertaining to UST systems or environmental incidents or concerns pertaining to the Subject Property. According to Chief Dennis Plante of the Berwick Fire Department, the Fire Department has no records of USTs on the Subject Property; however, Chief Plante stated that to the best of his knowledge, any historic USTs were removed from the site. Chief Plante stated that there have been several large fires at the Prime Tanning facility over the years, primarily involving their buffing operations. Many of the fires occurred in the early 1970s. He also stated that all oil or hazardous material spills were handled by Prime Tanning's in-house response team.

#### **6.4.2 Municipal Offices**

No local government officials were interviewed as part of this Phase I ESA. However, Ransom obtained information from the Town of Berwick Assessor's Office and Code Enforcement Office during a visit on May 17, 2010, and this information has been included throughout pertinent sections of this report.

### **6.5 OTHERS**

On June 19, 2009 and June 4, 2010, Ransom interviewed Mr. Ed Vigneault, Environmental Services Specialist with the MEDEP, for information pertaining to recent environmental investigations conducted as part of the hazardous waste site closure activities at Prime Tanning. Information provided by Mr. Vigneault has been included throughout pertinent sections of this report.

## 7.0 FINDINGS AND CONCLUSIONS

### 7.1 FINDINGS

The Subject Property is referred to as the Prime Tanning Company in the Town of Berwick, York County, Maine (the "Subject Property"). The Subject Property consists of four parcels of land identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively. The Subject Property encompasses a total of approximately 11.4-acres and is developed with a former leather tanning and processing complex, which includes the main facility, the former Blue Sort Building, paved driveway and parking areas, overgrown vegetation and grass areas, and wooded areas. Manufacturing operations ceased at the Prime Tanning facility in 2008, and the site has been unoccupied since that time.

The main facility building, located on Lot 146, encompasses a footprint of approximately 248,800 square feet. The facility was constructed in several phases over time, and is generally constructed of concrete block walls and concrete slab or wooden floors. The majority of the main facility consists of two stories. The remainder of the parcel consists of paved and gravel driveway/parking areas and grass areas.

The former Blue Sort Building located on Lot 130 is a one-story warehouse and encompasses approximately 14,341 square feet. The warehouse building has a concrete slab-on-grade foundation and a steel frame. The former paved employee parking lot is located in the southern portion of Lot 133. Lot 95 currently consists of an unimproved grass lot.

Historical sources indicate that the main facility parcel (Lot 146) has been occupied by a tannery since prior to 1877. Other historical occupants of the Subject Property identified during this assessment include a wool pulling works facility, a sash and door manufactory, a reed manufactory, a carriage manufactory, an oil company, a laundry facility, a shoe factory, and a lumber company.

Former operations performed at the Prime Tanning Facility involved the tanning and processing of leather. Previously treated hides, referred to as "blue stock hides" were delivered to the former Blue Sort Building where sorting, splitting, and shaving activities were conducted. The hides were subsequently transported to the main facility for further processing. Former processes conducted in the main facility included coloring, re-tanning, drying, coating, stuffing, buffing, trimming, and other miscellaneous treatment based on product specifications. Shipping, receiving, chemical storage (tank farm, process tanks, and drum storage), and wastewater pretreatment were also conducted at the Subject Property.

Historical uses of adjacent properties were identified during this assessment which may have to potential to adversely impact the environmental conditions of the Subject Property. These historical adjacent property uses include an electrical transformer yard and automobile repair garage located to the north, and saw mill, wood working facility, blacksmith, and coal sheds formerly located to the west of the Subject Property.

The Subject Property was identified in a search of State and Federal environmental databases as a UST site, a ME LUST site, an AST site, a LAST site, a ME SPILLS site, a RCRA Non-Generator of hazardous waste, a site listed in hazardous waste manifest databases for Connecticut and New York, and a site listed in the ME UIC, TRIS, FINDS, and TIER 2 databases.

The Subject Property was historically registered as a RCRA Large Quantity Generator of hazardous waste from 1980 through 2008. According to Mr. Ed Vigneault, Environmental Services Specialist for the MEDEP, the Subject Property underwent a RCRA Hazardous Waste Site Closure Certification in 2009 in accordance with the MEDEP Hazardous Waste Rules and Regulations, which included the completion of several investigations and cleanup activities.

Five USTs were formerly maintained at the Subject Property, including one 1,000-gallon unleaded gasoline UST, one 8,000-gallon diesel UST, one 500-gallon No. 2 fuel oil UST, one 250-gallon No. 2 fuel oil UST, and one 1,000-gallon No. 2 fuel oil UST. These five USTs are listed as having been removed from the site; however, limited documentation regarding the removal of these tanks has been identified, and the locations of these former USTs are currently unknown. Evidence of oil releases from one or more of these tanks was identified during tank removal activities conducted in 1987.

The site reconnaissance performed as part of this assessment identified several ASTs throughout the Subject Property. One 20,000-gallon No. 6 oil AST was observed adjacent to the boiler room in the northwestern portion of the main facility. A secondary containment structure surrounding an approximately 5,000-gallon formic acid AST was observed on the first floor in the eastern portion of the main facility. The tank was not visible; however, staining was not observed on the walls of the secondary containment structure. A lime silo and an approximately 180,000-gallon process water/neutralization tank were observed within the neutralization plant. The neutralization plant was assessed as part of the main Prime Tanning facility; however, the neutralization plant is located on a separate adjacent parcel owned by the Berwick Sewer District and also occupied by a wastewater pump station. An approximately 250-gallon aluminum chloride tank was observed inside the neutralization plant.

A tank farm was observed on the first floor in the northern portion of the main facility building. A total of 19 ASTs, ranging in size from approximately 2,500-gallons to 4,500-gallons were observed. These tanks were reported to have been drained as part of site closure activities. The tank farm consisted of process chemicals utilized in the tannery operations. A propane tank was observed located north of the neutralization plant. Fill and vent pipes associated with an approximately 3,000-gallon No. 2 fuel oil AST were observed along the northern exterior wall of the former Blue Sort Building. The tank room of the Blue Sort Building was locked at the time of the site reconnaissance and not able to be observed. Oil staining was observed on and in the vicinity of the fill pipe. Additional process tanks were also observed during the site reconnaissance, including hot water tanks, river water tanks, and mixing tanks. Approximately eight wooden mixing drums were observed in the coloring area of the main facility (first floor). The drums were formerly utilized for coloring/dyeing.

Standing water was observed near the loading dock located east of the main facility building. A shean was not observed on the standing water at the time of the site reconnaissance. Standing water was also observed in a floor trench located in the wet weigh up room (eastern portion of the main facility building), and a shean was observed.

Several drums were observed throughout the main facility building at the time of the site reconnaissance. Two 55-gallon drums of oil and approximately ten 55-gallon drums of process chemicals (empty or partially full) were observed in the shipping area located within the northeastern portion of the main facility on the first floor. The drums were stored on pallets or directly on the concrete floor and appeared to be in good condition with no leaks or staining observed. Approximately eight 55-gallon drums were observed in the carpenter shop located in the southeastern portion of the main facility and appeared to contain miscellaneous solid waste or parts and equipment.

Four 55-gallon drums of boiler feed water treatment chemicals were observed stored on pallets in the boiler room. The drums appeared to be in fair condition at the time of the site reconnaissance with some staining observed on the drums.

An oil storage area was observed inside the former Blue Sort Building. No oils were observed being stored in this area at the time of the site reconnaissance. Lubricating oil, hydraulic oil, and recycled oil were formerly stored in this location. Staining was observed on the concrete floor in this area.

Several transformers were observed throughout the Subject Property and along the site's perimeters. Three pad-mounted transformers were observed within a fenced area along the eastern wall of the main facility. The transformers appeared to be in good condition at the time of the site reconnaissance. Three former pad-mounted transformers were historically located north of the existing transformers. One pole-mounted transformer was observed in the central portion of the main facility parcel, east of the building. The transformer appeared discolored and in fair to poor condition at the time of the site reconnaissance. A total of 11 additional pole-mounted transformers were observed on the Subject Property or along the site's perimeters. These transformers appeared to be in good condition with no evidence of leaks or staining observed.

Several areas of staining were observed on the floors and walls throughout the former tannery facility at the time of the site reconnaissance. The majority of the stains appeared to be due to numerous small releases over time associated with the facility's historic industrial use.

Several floor drains and trenches were observed throughout the first floor of the main facility building. According to the former Facility Engineer for Prime Tanning, the floor drains and trenches are connected to the site's wastewater pretreatment system. The site's pretreatment system neutralizes the process wastewater prior to discharge to the municipal wastewater system. The pretreatment system included a neutralization tank, a lime silo, and aluminum chloride ASTs. Lime was added to the wastewater to adjust the pH, and the aluminum chloride was added to the wastewater for flocculation purposes. The site's pretreatment system has operated since the 1970s. Prior to this date, wastewater from the facility was reportedly discharged directly to the nearby Salmon Falls River through facility drains and a culverted stream beneath the main facility (see below). Wastewater is not currently generated at the Subject Property.

Two drains are located in the delivery areas of the main facility parcel, including the main loading dock located east of the facility building, and a truck off-loading station located in the northwestern portion of the main facility. The drains discharge to a culverted stream that extends through the main facility parcel. Both drains are equipped with shut-off valves that were historically closed during deliveries in order to contain any potential releases of oil or hazardous materials.

On June 19, 2009, Ransom conducted a file review at the MEDEP Bureau of Remediation and Waste Management, as well as, an interview with Mr. Vigneault for information pertaining to the environmental investigations conducted as part of the hazardous waste site closure activities at the Subject Property. Ransom contacted Mr. Vigneault on June 4, 2010 for any updates pertaining to the Subject Property since Ransom's file review in June 2009. Mr. Vigneault stated that he sent a letter to Prime Tanning on July 1, 2009 which acknowledged that he reviewed the closure documents for the site, and closure activities appear to have met the requirements of MEDEP Chapter 851, Standards for Generators of Hazardous Waste, Section 11, RCRA Site Closure.

## 7.2 CONCLUSIONS

Ransom has completed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 for the property identified by the Town of Berwick Assessor's Office as Lots 95, 130, 133, and 146 on Tax Map U-4, which correspond to 29 Sullivan Street, 35 Sullivan Street, 34 Sullivan Street, and 20 Sullivan Street, respectively, in the Town of Berwick, York County, Maine. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. This assessment has revealed evidence of the following recognized environmental conditions in connection with the Subject Property:

- Historic tannery operations and other various industrial operations conducted on the Subject Property involving the use, storage, and identified releases of oil and hazardous materials represent an environmental concern. Several releases of oil and hazardous materials have been reported and documented for the Subject Property.
- Parcels purchased by Prime Tanning (now part of the existing Lot 146) were historically operated by an oil company (prior to 1962) and a laundry facility (prior to 1974). Former operations involving the use, storage, and potential releases of oil and/or hazardous materials, including petroleum products and dry cleaning chemicals on the Subject Property are considered a REC.
- Although the Subject Property has undergone a RCRA Hazardous Waste Closure Certification in accordance with the MEDEP Hazardous Waste Rules and Regulations, the historic generation, storage, and releases of hazardous wastes on the Subject Property have the potential to have impacted soil, soil vapor, and/or groundwater conditions.
- The locations of the former USTs, reportedly removed from the Subject Property, and subsurface conditions in the vicinity of the former USTs are currently unknown. No documentation relative to the removal or subsurface conditions was available or identified during this study.
- During environmental investigations conducted as part of Prime Tanning site closure activities, significant leather debris was identified in test pits excavated directly north of Prime Tanning's main facility. In addition, the parking lot and driveway areas surrounding the main facility were reportedly constructed with unknown fill materials. Historic improper disposal of buried hides, leather scraps, construction/demolition debris, or other solid waste fill materials conducted by Prime Tanning in other areas of the Subject Property including the fill areas of Lot 133 (parking lot) also represent an environmental concern.
- Historic industrial occupants of Lot 130, including a shoe factory and a building materials and lumber company, may have conducted operations involving the use, storage, and potential releases of oil and/or hazardous materials.
- A former garage located along the northwestern portion of the vacant employee parking lot (Lot 133) was demolished around 2004. Limited information is available pertaining to historic operations within the garage. The unknown operations including potential automotive and/or equipment repair within the garage represent an environmental concern.

- Historic land uses of properties abutting the Subject Property, including a former saw mill, wood working facility, blacksmith, and coal sheds formerly located on properties west of the site, and a transformer yard historically located north of the Subject Property, may have involved the use, storage, and potential releases of oil and/or hazardous materials. In addition, a service garage was historically and is currently located to the northeast and upgradient of the main facility parcel.
- Areas of oil and chemical staining were observed throughout the former tannery facility. Releases of oil or hazardous materials within the facility have the potential to have impacted soil, soil vapor, or groundwater conditions in areas where the concrete slab foundation or exterior walls of the facility are in poor condition.

Ransom also identified the following ASTM non-scope considerations in connection with the Subject Property that represent potential business environmental risk but are outside the standard scope of services prescribed by ASTM Standard Practice E 1527-05:

- Suspect asbestos-containing building materials, including thermal system insulation, such as tank insulation materials, transite panels, and floor tiles, were observed throughout the former tannery facility.
- Suspect PCB-containing building materials, such as window caulking and fluorescent light ballasts, may be present in the former tannery facility.
- Based on the age of the Subject Property buildings, lead-based paint may be present.

## 8.0 RECOMMENDATIONS

Ransom recommends the following additional investigation to address the identified RECs:

- A Phase II environmental investigation should be conducted to determine whether the Subject Property has been impacted from historic industrial operations conducted on the site; potential historic releases of oil and/or hazardous materials associated with former onsite USTs; historic industrial operations conducted on adjacent off-site properties; and reported and potential historic release of oil and/or hazardous materials on the Subject Property and nearby off-site properties. In addition, the Phase II environmental investigation is recommended to further evaluate whether improper disposal activities, such as buried hides, leather scraps, construction/demolition debris, or other solid waste fill materials were conducted in other areas of the Subject Property that were not previously assessed or fully assessed during prior investigations.
- A Hazardous Materials Inventory (HMI) should be performed within the former tannery facility to identify potentially regulated building materials such as asbestos-containing building materials, PCB-containing building materials, lead-based paint, and other universal wastes which may require abatement or special disposal considerations when the Subject Property buildings are redeveloped or demolished in the future. Asbestos-containing building materials, suspect lead-based paint, suspect PCB-containing building materials, and universal wastes should be managed appropriately as part of redevelopment activities.
- Areas of significant oil staining should be properly cleaned if future redevelopment plans call for the reuse of such building surfaces or areas. Building materials exhibiting significant staining may need to be properly characterized for disposal if future redevelopment plans involve the demolition of these areas. In addition, any remaining OHM should be properly characterized and disposed of off-site in accordance with local, State, and Federal regulations.
- The Subject Property should be entered into the MEDEP Voluntary Response Action Program (VRAP).

## **9.0 ADDITIONAL SERVICES AND NON-SCOPE CONSIDERATIONS**

### **9.1 ADDITIONAL SERVICES**

No additional services beyond the standard scope of services prescribed by ASTM Standard Practice E 1527-05 were requested by the client.

### **9.2 NON-SCOPE CONSIDERATIONS**

The following environmental issues are outside the scope (non-scope considerations) of the standard practice defined by ASTM Standard Practice E 1527-05. This Phase I ESA does not identify or evaluate these non-scope considerations:

- Asbestos-containing building materials;
- Radon;
- Lead-based paint;
- Lead in drinking water;
- Wetlands;
- Regulatory compliance;
- Cultural and historic resources;
- Industrial hygiene;
- Health and safety;
- Ecological resources;
- Endangered species;
- Indoor air quality;
- High-voltage power lines;
- Biological agents; and
- Mold.

## 10.0 REFERENCES

1. Aerial Photograph Package from EDR, June 9, 2009.
2. American Society for Testing and Materials International Designation: E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2005.
3. Bedrock Geologic Map of Maine, Maine Geological Survey, 1985.
4. Certified Sanborn® Map Report from EDR, June 9, 2009.
5. EDR City-Directory Abstract, June 11, 2009.
6. EDR Historical Topographic Map Report, June 8, 2009.
7. EDR Radius Map with GeoCheck®, May 11, 2010.
8. Historical map provided by the Town of Berwick entitled, "Bird's Eye View of Great Falls and Berwick," dated 1877.
9. Interview with Mr. Ed Vigneault, Environmental Services Specialist, Maine Department of Environmental Protection, June 19, 2009.
10. Interview with Mr. Wayne Chasse, Former Facility Engineer for Prime Tanning Company, May 17, 2010.
11. Records reviewed at the Maine Department of Environmental Protection, June 19, 2009.
12. Records reviewed at the Town of Berwick Assessor's Office, May 17, 2010.
13. Records reviewed at the Town of Berwick Code Enforcement Office, May 17, 2010.
14. Information provided by the Town of Berwick Fire Department, June 4, 2010.
15. Surficial Geologic Map of Maine, Maine Geological Survey, 1985.

## 11.0 SIGNATURE(S) OF ENVIRONMENTAL PROFESSIONAL(S)

This Phase I Environmental Site Assessment was conducted in general accordance with the requirements of ASTM Standard Practice E 1527-05 by the undersigned. Any work completed on this Phase I Environmental Site Assessment by an individual who is not considered an environmental professional was completed under the supervision or responsible charge of the environmental professional(s) listed below.

### Primary Assessors and Report Author

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Kristin D. Gill, E.I.  
Project Engineer/Primary Author

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Eriksen P. Phenix, C.G.  
Project Geologist

### Environmental Professional

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

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Peter J. Sherr, P.E.  
Senior Project Manager

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Nicholas O. Sabatine, P.G.  
Vice President & Senior Geologist