



PN: 10-3206

September 1, 2010

Ms. Jean Firth
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re: Asbestos Identification Survey for the Former Prime Tanning Facility Located in Berwick, Maine.

Dear Ms. Firth:

At your request, Summit Environmental Consultants, Inc. (Summit) completed an asbestos identification survey for the structures associated with the former Prime Tanning Mill complex. This ACM survey was completed by Summit for, and at the request of the Maine Department of Environmental Protection (MEDEP), on behalf of the Southern Maine Regional Planning Commission, under a grant (**Grant # 2B-96112201-0**) from the American Recovery and Reinvestment Act of 2009 (ARRA).

The mill complex consists of the Main Mill Building and several out buildings including:

- The Wet Blue Building (The Warehouse);
- The Neutralization Building; and
- The Bulk Storage "Lean To".

The Main Mill Building divided into areas associated with the process performed within that area. For the purposes of this survey, these areas are referenced by the following designated names:

FIRST FLOOR

- | | | |
|----------------------|--|-----------------------|
| • Toggle Ops - North | • Technical Offices
(including front entry) | • Coloring |
| • Toggle Ops | • Buffing | • Hot Water Tank Room |
| • Paste Department | • Season Oil | • Spray |
| • Finish – West | • Boiler Room Complex | • Mixing Room |
| • Finish – East | • Maintenance | • Vac Dry Area |
| • R & D | • Chemical Weigh Up | • Storage/Racking |
| • Tank Farm | | • Dry Weigh Up - West |
| • Tumble | | |

- Compressor Rooms
- Stuffing Ops
- Dry Weigh Up – East
- Receiving
- Chemical Storage – Drum
- Chemical Storage – Dry
- Fork Truck Repair Shop
- Carpentry Shop

SECOND FLOOR

- Administrative Offices
- Engineering
- Cafeteria
- Final Sort
- Laboratory
- Pack and Ship
- Horse Storage 1
- Horse Storage 2
- Tool Crib
- Maintenance Storage

Refer to the enclosed Site Plans for the locations of these areas.

This asbestos identification survey was conducted in accordance with the Maine Department of Environmental Protection (MEDEP) Chapter 425 Asbestos Management Regulations promulgated May 29, 2004 and was completed to provide the MEDEP with information regarding the presence of interior and exterior asbestos-containing materials (ACM) in the above referenced structures prior to their proposed demolitions. Mr. Dennis Kingman and Ms. Suzanne Chase (both of Summit), asbestos inspectors licensed in the State of Maine, performed the field survey on July 20 and 21, 2010.

Completion of the asbestos demolition impact survey included:

- Review of available, previously completed asbestos sampling reports and asbestos abatement project documentation;
- Visual identification of suspect ACM on the interior and exterior;
- Collection of 184 bulk samples of the identified suspect ACM from the interior of the buildings in accordance with MEDEP regulations;
- Collection of 212 bulk samples of the identified suspect ACM from the exterior of the buildings in accordance with MEDEP regulations; and
- Quantification of ACM identified by laboratory analysis.

An asbestos identification survey is subject to a variety of limitations and may not be able to identify all ACM present throughout a structure. Limitations to be considered in interpreting the results of the survey performed on this building include the following:

- Variations in building materials used during construction and subsequent renovations;
- Accessibility at the time of the survey (i.e.; lighting, access to the interior of machinery and electric switches and equipment, etc.); and
- Condition of the building at the time of the survey.

The exterior of large equipment and electrical switches present throughout the facility including the dryers, pasting equipment and the boilers were visually evaluated for the presence of suspect ACM and, where accessible, the interiors of this equipment were also evaluated. The equipment was not dismantled and destructive sampling techniques were not used to evaluate the interiors.

Following the completion of the survey work, the bulk samples of suspect ACM were submitted to EMSL – NJ of Cinnaminson, New Jersey (interior samples) and EMSL – MA of Woburn, Massachusetts (roof survey samples) for analysis. The method used to analyze the bulk samples collected during this survey was the recommended United States Environmental protection agency (USEPA) procedure of Polarized Light Microscopy (PLM) with dispersion staining. Samples were analyzed at the EMSL laboratories, which are certified to perform asbestos analysis by both the National Voluntary Laboratory Accreditation Program (NVLAP) and the American Industrial Hygiene (AIHA). EMSL is a MEDEP licensed Asbestos Analytical Laboratory.

Previously completed assessments for ACM included:

- A 1999 asbestos survey completed by Abatement Professionals.

A copy of this report is included as Attachment B.

The following report provides a summary of our field findings and laboratory analytical results for this facility.

INTERIOR

Main Mill Building

The Main Mill Building consists of a two story structure, with numerous additions of varying dates of construction. Asbestos previously identified as reported by Abatement Professionals within the Main Mill Building included:

- Transite wall board;
- Hot water tank insulation;
- Floor tile and associated floor tile adhesive;
- Mudded pipe fitting insulation; and
- Exterior siding.

One hundred and twenty-five (125) samples of suspect ACM were collected from the interior of the Main Mill Building. In addition to previously unidentified suspect ACM, confirmatory samples were collected from materials previously reported as ACM by Abatement Professionals.

Materials sampled included:

- Pipe insulation;
- Mudded pipe fitting insulation;
- Insulation debris;
- Seven types of suspended ceiling tile;
- Three types of sheet flooring;
- Sub-flooring material;
- Two types of asphalt paper wall covering;
- Four types of asphalt shingles on interior walls and associated felt paper underlayment;
- Five types of floor tile;
- Floor tile adhesive;
- Carpet adhesive;
- Refractory mud under metal boiler cover;
- Sheetrock wall board;

- Wall and ceiling plaster;
- Tank end cap coating;
- Window glazing;
- Mastic on metal duct seams; and
- Cloth anti-vibration gasket.

Laboratory analytical results indicated or confirmed the following materials Main Mill Building as ACM:

- Pipe insulation;
- Residual mudded insulation of pipe fittings associated with steam mains. The original fittings were reportedly previously removed by Abatement Professionals. Remaining fitting insulation in the Main Building was non-ACM;
- 9-Inch by 9-inch green floor tile and associated adhesive;
- Refractory mud under metal boiler cover;
- Brown asphalt siding on interior walls; and
- Gray asphalt siding on interior walls.

The “Wet Blue” Building (The Warehouse)

The “Wet Blue” Building consists of a single story metal and concrete block warehouse type structure. Three samples of suspect ACM were collected from the interior of the building. Suspect ACM identified on the interior of the structure included:

- Spray-applied wall and ceiling insulation.

Laboratory analytical results indicated that asbestos was not identified in the suspect material sampled.

The Neutralization Building

The Neutralization Building consists of a single story wood-framed structure. Three samples of suspect ACM were collected from the interior of the building. Suspect ACM identified on the interior of the structure included:

- Sheetrock wall and ceiling material.

Laboratory analytical results indicated that asbestos was not identified in the suspect material sampled.

The Bulk Storage “Lean-To”

The Bulk Storage “Lean-To” building consists of an open wood-framed and concrete structure. Suspect ACM was not identified in this structure.

EXTERIOR

The exterior of the buildings associated with the Prime Tanning Mill complex were visually evaluated for the presence of suspect ACM. Evaluation of these buildings identified 51 unique roof areas. Roof areas were differentiated by the roof levels or by the type of roofing present on a specific area (e.g.; asphalt roofing with stone ballasts, silver coated roofing, or rubber membrane roofing), and each area was sampled as a separate homogeneous area. Equipment, piping and other suspect ACM materials present within these homogeneous areas were also evaluated for asbestos.

Two hundred and twelve (212) samples of suspect ACM were collected from the exterior of the buildings associated with the Prime Tanning Mill complex. Suspect materials sampled included:

- Built-up asphalt roofing;
- Roofing present under rubber roof membrane;
- Roof edge and penetration flashing;
- Asphalt roof shingles and associated felt paper underlayment;
- Exterior asphalt siding material;
- Exterior cementitious siding (transite) siding material;
- Mastic on piping;
- Expansion joint material (from piping);
- Roof patching; and window caulk.

Laboratory analytical results identified asbestos on 20 of the designated roofing areas. A description of the identified ACM including locations and quantities is presented in Table 2.

SUMMARY

Tables 1 and 2 provide a summary of ACM identified on the interior and exterior of the buildings associated with the Prime Tanning Mill complex and includes the location and quantity of ACM present. Table 3 provides an estimated cost for abatement of the identified ACM. Complete laboratory analytical results and chain of custodies are included as Appendix A. Sample locations and the locations of identified ACM are presented in Figures 1 through 3.

Please contact me at (207) 262-9040 if you have any questions related to this project or if additional services are required.

Sincerely,

SUMMIT ENVIRONMENTAL CONSULTANTS, INC.

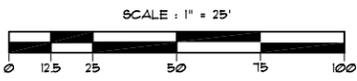


Dennis B. Kingman, Jr. CHMM
Manager, Environmental Services
MEDEP Asbestos Inspector AI-0034

Attachments

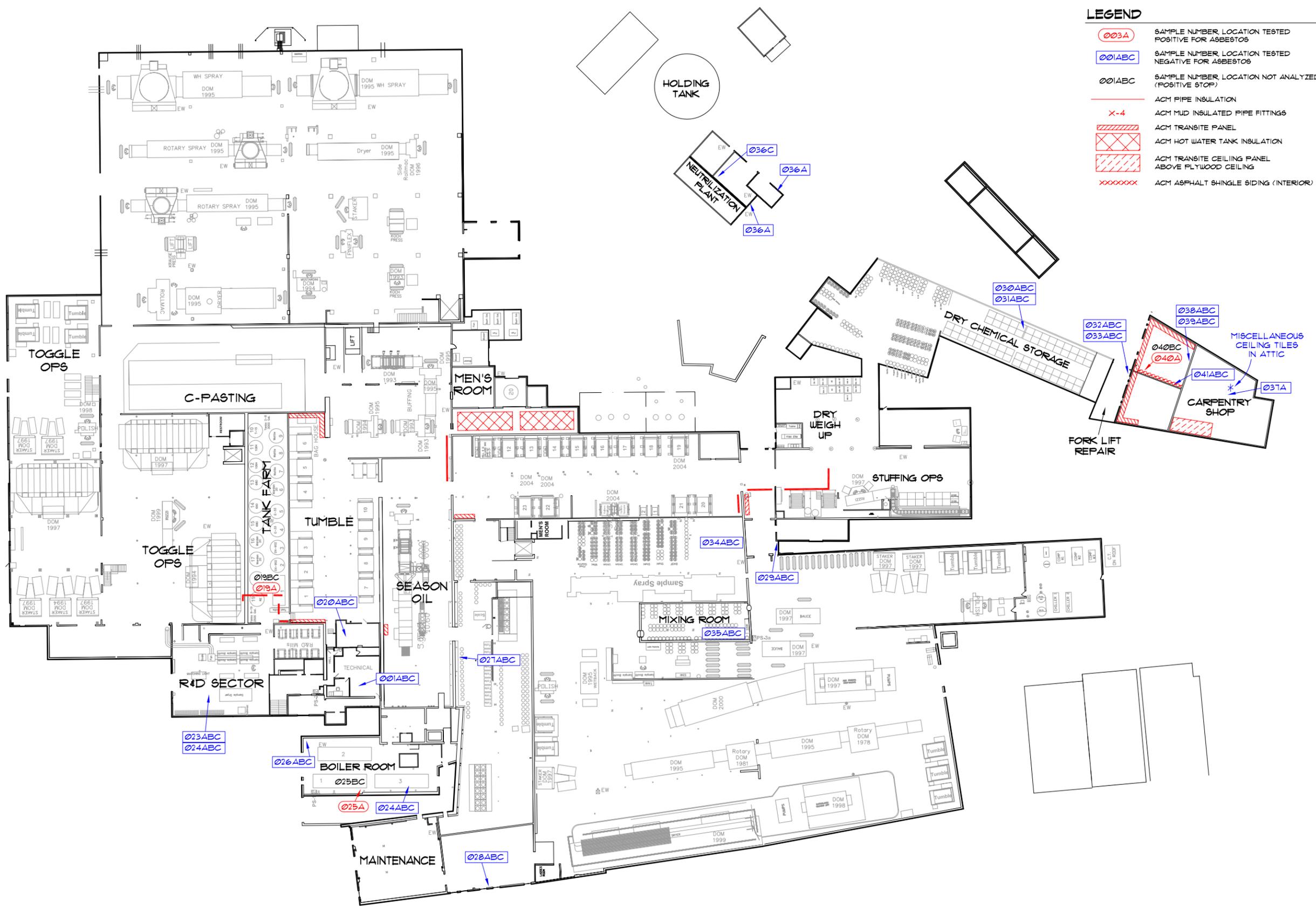
FIGURES

FIGURE 1
FIRST FLOOR



LEGEND

- 003A SAMPLE NUMBER, LOCATION TESTED POSITIVE FOR ASBESTOS
- 001ABC SAMPLE NUMBER, LOCATION TESTED NEGATIVE FOR ASBESTOS
- 001ABC SAMPLE NUMBER, LOCATION NOT ANALYZED (POSITIVE STOP)
- ACM PIPE INSULATION
- X-4 ACM MUD INSULATED PIPE FITTINGS
- ACM TRANSITE PANEL
- ACM HOT WATER TANK INSULATION
- ACM TRANSITE CEILING PANEL ABOVE FLYWOOD CEILING
- XXXXXX ACM ASPHALT SHINGLE SIDING (INTERIOR)



PROJECT:	ASBESTOS IDENTIFICATION SURVEY FIRST FLOOR (INTERIOR)			
PROJECT:	PRIME TANNING BERWICK PLANT			
ADDRESS:	BERWICK MAINE	DRAWN BY:	KRF	
CLIENT:	MAINE D. E. P.	DATE:	AUGUST 2010	APPR BY:
DATE:	AUGUST 2010	SCALE:	1" = 25'	
NO.	NO.	REVISION	REVISION	
DATE:	DATE:	DATE:	DATE:	

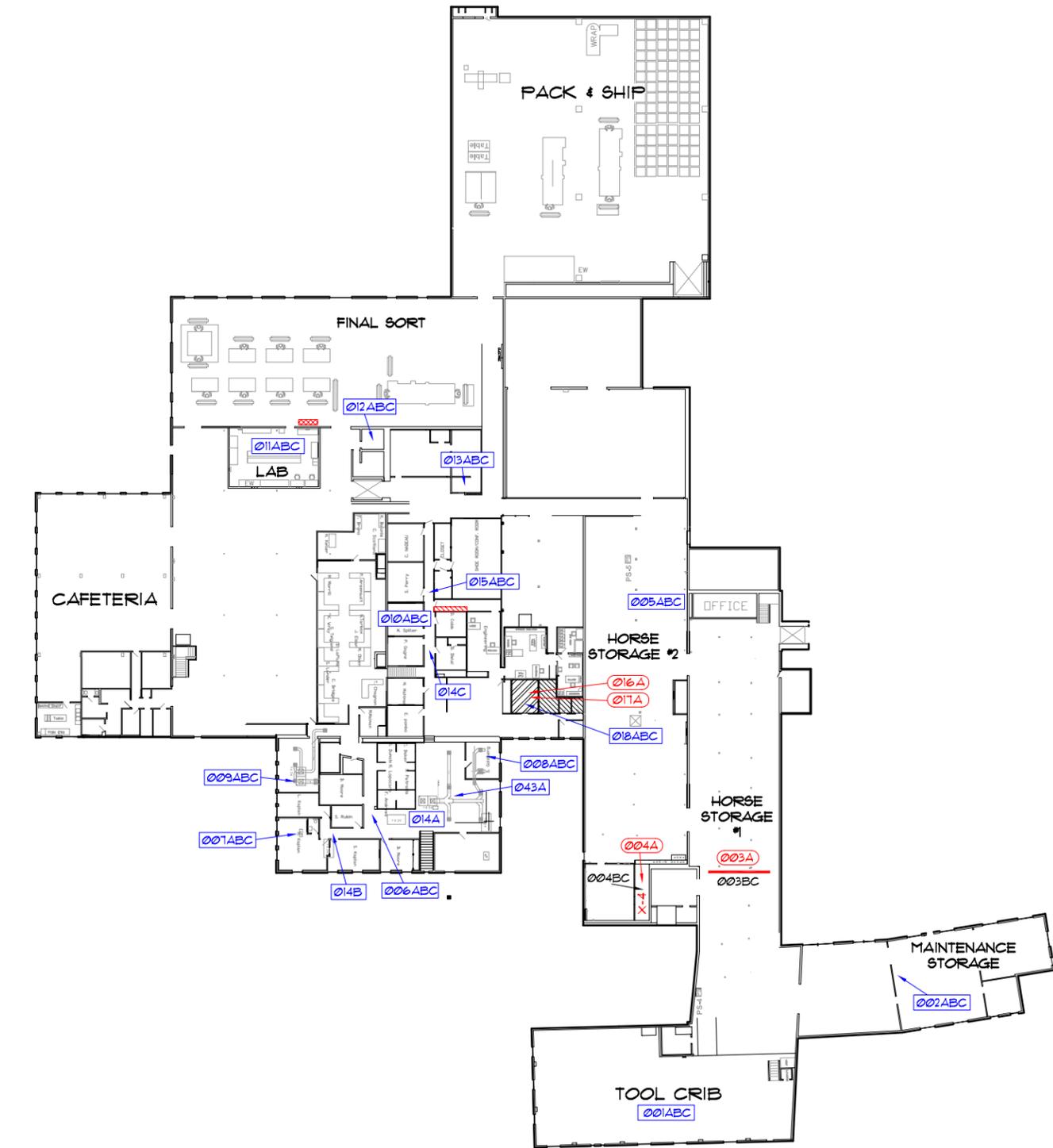
640 MAIN ST.
LEWISTON, MAINE 04240

Tel: (207) 795-6093
Fax: (207) 795-6128

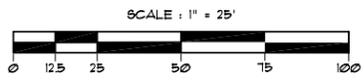


PROJ. #10-3206
SHEET NUMBER

FIGURE 2
SECOND FLOOR

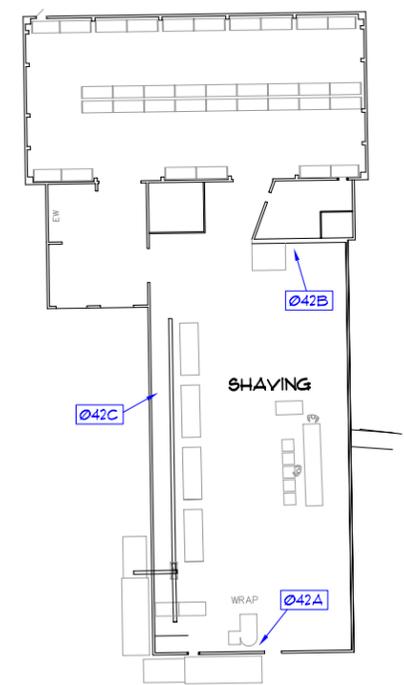


SECOND FLOOR PLAN
SCALE: 1" = 25'



LEGEND

003A	SAMPLE NUMBER, LOCATION TESTED POSITIVE FOR ASBESTOS
001ABC	SAMPLE NUMBER, LOCATION TESTED NEGATIVE FOR ASBESTOS
001ABC	SAMPLE NUMBER, LOCATION NOT ANALYZED (POSITIVE STOP)
	ACM PIPE INSULATION
X-4	ACM MUD INSULATED PIPE FITTINGS
 	ACM TRANSITE PANEL
 	ACM LAB TABLE TOP
 	ACM FLOOR TILE AND ASSOCIATED ACM ADHESIVE
 	ACM FLOOR TILE AND ASSOCIATED ACM ADHESIVE UNDER CARPET



"WET BLUE" WAREHOUSE
SCALE: 1" = 25'

PROJECT: PRIME TANNING BERWICK PLANT		SHEET TITLE: ASBESTOS IDENTIFICATION SURVEY SECOND FLOOR (INTERIOR) WAREHOUSE (INTERIOR)		DRAWN BY: KRF		DATE: AUGUST 2010	
ADDRESS: BERWICK MAINE		CLIENT: MAINE D.E.P.		APPR BY: DK		NO.	
TEL: (207) 755-6009		FAX: (207) 755-6128		SCALE: 1" = 25'		REVISION	
640 MAIN ST. LEWISTON, MAINE 04240				DATE: AUGUST 2010		DATE	
				PROJ. #10-3206		SHEET NUMBER	
				2			

FIGURE 3
EXTERIOR

