



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**DATE:** July 23, 2019

**SUBJ:** Site Investigation Closure Memorandum  
Loring Abandon Drum Site  
Loring Development Authority  
Limestone, Maine 04750

**FROM:** Michael J. Nalipinski, On-Scene Coordinator  
Emergency Response and Removal Section I

**THRU:** Edward J. Bzenas, Chief  
Emergency Response and Removal Section I

**TO:** Loring Abandon Drum Site File

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In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Loring Abandoned Drum Site ("Site") in Limestone, Maine. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The Loring Abandon Drum Site was identified by the Maine Department of Environmental Protection for EPA's removal consideration.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release:
  - a. The Removal Site Evaluation consisted of the following actions:

- i. Review of photographs taken by OSC Nalipinski on July 17, 2019.
  - ii. Review of other documents correspondence between the Maine Department of Environmental Protection, the Air Force Base Conversion Agency and the U.S. EPA Region One dated June 10, 2019 referencing notification of dispute resolution under the Federal Facilities Agreement.
  - iii. Interviews with the Maine Department of Environmental Protection Presque Isle and Augusta staff and the Loring Development Authority.
  - iv. The Site Investigation on July 17, 2019.
  - v. Review of PA and SI forms dated July 18, 2019.
  - vi. The Site Review meeting on July 22, 2019, where site investigation results were shared with the Site case Team and Emergency Planning & Response branch management, and the decision to conduct a Removal Action was supported.
- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

Hazardous Substances or  
Pollutants or Contaminants

Media

AFFF

Various Containers

2. Evaluation of the threat to public health, welfare and the environment

- a. Federal Agency for Toxic Substances and Disease Registry:

Threat ☐ No Threat ☐ Evaluation Not Necessary ☒

- b. Endangerment to the ecosystem:

Threat ☐ No Threat ☐ Evaluation Not Necessary ☒

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).

- ☐ There is no release.
- ☐ The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- ☐ The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- ☐ It is subject to the limitations on response specified in 300.400(b)(1) through (3). The release is
  - ☐ of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
  - ☐ from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
  - ☐ into public or private drinking water supplies due to deterioration of the system through ordinary use.
- ☐ The amount, quantity, or concentration released does not warrant a Federal response.
- ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
- ☒ The Removal Site Evaluation is complete.

4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.

- ☐ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.



- ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- ☒ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- ☐ Threat of fire or explosion.
- ☒ The availability of other appropriate Federal or State response mechanisms to respond to the release.
- ☒ Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary.

- b. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency ☐

Time-Critical ☒

Non Time-Critical ☐

On July 17, 2019, the EPA OSC mobilized to the Site to conduct the SI. The EPA OSC met with the Loring Development Authority Facilities Manager (LDA) and conducted an inspection of the AFFF drums, totes, containers located in Building 7210. Approximately 57 steel/overpacked 55 gallon drums, 4 steel 35 gallon drums, 9 steel 30 gallon drums, one 275 gallon tote (two other totes were also identified containing AFFF) and one trailer containing 1000 gallons of AFFF were observed on the concrete floor along the north wall of the building near the main door. According to the labels on the containers and the LDA representative all the material is AFFF product which is a CERCLA pollutant. The ownership of the containers is uncertain and are being considered as abandoned.

A Site Review Meeting was held on July 22, 2019. The Site Team concurred on the recommendation for a Removal Action. The OSC will prepare an Action Memorandum to address the removal and disposal of the containers at this Site.

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its

completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

- ☐ There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
- ☒ There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary. There has been no release, nor is there a potential threat of release of release, of oil at the site, and therefore an Oil Spill response under Appendix E to Part 300 of the NCP is not warranted.

cc: Edward J. Bzenas, Chief, Emergency Response and Removal Section I, SEMD (w/o attachments)  
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, SEMD (w/o attachments)  
Patti Ludwig, EPRB, SEMD (w/o attachments)

Encl: PA/SI Report





**EPA REGION I  
REMOVAL PRELIMINARY ASSESSMENT**

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**Site Name and Location**

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**Name:** Loring Abandoned Drums  
**Town:** Limestone

**Location:** Build. 7210, 14 Colorado Blvd  
**County:** Aroostook **State:** ME

**Site Status:**      ☒ **NPL** ☐ **NON-NPL**      ☐ **RCRA**      ☐ **TSCA**  
                         ☒ **ACTIVE**    ☐ **ABANDONED**    ☐ **OTHER**

☐ **Attached USGS Map of Location**                      ☐ **Site I.D. No.:** 01F4

**Latitude:**      46 56'21.79" N                      **Longitude:**    67 53'38.50" N

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**Referral**

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☐ **Citizen**                      ☐ **City/Town**                      ☒ **State**                      ☐ **Preremedial**  
☐ **RCRA**                      ☐ **Other: Remedial**

**Name of referring party:** Mr. Naji Akladiss                      **Telephone:** (207) 557-4312  
**Address:** Maine DEP – 17 State House Station, Augusta, ME 04333

**Contacts Identified**

1)                                      **Telephone:** ()  
2)                                      **Telephone:** ()  
3)                                      **Telephone:** ()

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**Source of Information**

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☒ **Verbal:**  
☐ **Report: Analytical data report**  
☒ **Other:** Correspondence dated 10 June 2019 from the Maine DEP to the U.S. EPA and U.S. Air Force

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**Potential Responsible Parties**

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**Name:**                                      **Telephone:** ()  
**Address:**

**Operator:**                                      **Telephone:** ()  
**Address:**



## REMOVAL PRELIMINARY ASSESSMENT

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### Site Access

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**Authorizing Person:** Carl Flora, President, Loring Development Authority

**Date:** 7/16/19

☒ **Obtained**

☒ **Verbal**

**Telephone:** (207) 328-7005

☐ **Not Obtained**

☐ **Written**

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### Physical Site Characterization

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**Background Information:** Approx. 4-5000 gal AFFF is stored in various sized containers on a concrete floor in warehouse Building 7210. This building is currently rented to a truck parts distributor. The warehouse is accessible to customers. The containers are within 20 ft of the primary warehouse garage door.

### Description of Substances Possibly Present, Known or Alleged:

Original AFFF product is stored in various sized containers. The containers have original labeling. Some of the containers have been overpacked by the Maine DEP. AFFF is currently a pollutant under CERCLA. Photos of the AFFF container storage area has been provided to EPA by Maine DEP.

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### Existing Analytical Data

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None.

☐ **Real-Time Monitoring Data:**

☐ **Sampling Data:**

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### Potential Threat

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Description of potential hazards to the environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2]:

☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.

☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems.



## REMOVAL PRELIMINARY ASSESSMENT



Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

## REMOVAL PRELIMINARY ASSESSMENT

### Potential Threat (Concluded)

- ☒ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- ☒ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- ☐ Threat of fire or explosion.
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release.
- ☒ Other situations or factors that may pose threats to public health or welfare or the environment.

### Prior Response Activities

☐ PRP      ☒ STATE      ☐ FEDERAL      ☐ OTHER

**Brief Description:** According to records originally the AFF was owned by the US Air Force but was transferred to the Loring Development Authority after the base closed. At some point approx. 1/2 of the 4-5000 gallons was distributed to local fire departments. In 2018 and 2019 the Maine DEP collected the material from the various local fire departments and returned the containers to Building 7210 on the LDA property. Currently approximately 4-5,000 gallons of AFF product is stored in various sized containers.

### Priority for Site Investigation

☒ High      ☐ Medium      ☐ Low      ☐ None

**Comments:**

### Report Generation

**Originator:** OSC Mike Nalipinski  
**Affiliation:** U.S. EPA/EPRB  
**TDD No.:** N/A

**Date:** 17 July 2019  
**Telephone:** (617) 680-5469  
**Task No.:** N/A



**EPA REGION I  
REMOVAL SITE INVESTIGATION**

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**Inspection Information**

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**Site Name:** Loring Abandoned Drums **Address:** 14 Colorado Blvd Build 7210

**Town:** Limestone

**County:** Aroostook

**State:** ME

**Date of Inspection:** 7/17/19

**Time of Inspection:** 0830-1030

**Weather Conditions:** Sunny temps low 80s light wind

**Site Status at Time of Inspection:** ☒ **ACTIVE**

☐ **INACTIVE**

**Comments:** Various types of containers, drums, totes, trailer were stored inside an active warehouse on a concrete floor. The company operating inside the warehouse provided parts for trucks. The area was accessible to the public.

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**Agencies/Personnel Performing Inspection**

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	<u>Names</u>	<u>Program</u>
<input checked="" type="checkbox"/> <b>EPA:</b>	Region One EPRB	OSC Mike Nalipinski
<input type="checkbox"/> <b>EPA Contractor:</b>		
<input type="checkbox"/> <b>State:</b>		
<input checked="" type="checkbox"/> <b>Other:</b>	Loring Development Authority- Neil Haines, Maintenance Supervisor	

**Current Owner Based on Field Interview:** The owner of the warehouse is Loring Development Authority (LDA). 60 drums, the 1000 gal tanker trailer (in building 7210) and the approx. 100 gal of AFFF in three different fire trucks are owned by the LDA. The ownership of the remaining containers stored in the Building 7210 which were collected from various local fire departments by the Maine DEP is uncertain.

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**Physical Site Characteristics**

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<u>Parameter</u>	<u>Quantities/Extent</u>
<input type="checkbox"/> <b>Cylinders:</b>	
<input checked="" type="checkbox"/> <b>Drums:</b> Approx. sixty 55-gal drums	
<input type="checkbox"/> <b>Lagoons:</b>	
<input checked="" type="checkbox"/> <b>Tanks:</b>	<input checked="" type="checkbox"/> <b>Above:</b> One 1000 gal trailer
	<input type="checkbox"/> <b>Below:</b>
<input type="checkbox"/> <b>Asbestos:</b>	
<input type="checkbox"/> <b>Piles:</b>	
<input type="checkbox"/> <b>Stained Soil:</b>	

- ☐ **Sheens:**
- ☐ **Stressed Vegetation:**
- ☐ **Landfill:**
- ☐ **Population in Vicinity:**



## REMOVAL SITE INVESTIGATION

### Physical Site Characteristics (Concluded)

Parameter	Quantities/Extent
<input type="checkbox"/> Wells:	<input type="checkbox"/> Drinking:
	<input type="checkbox"/> Monitoring:
<input type="checkbox"/> Other:	

### Physical Site Observations

In total there are approximately between 3-4000 gallons of AFFF in various types of containers currently stored in Building 7210. There is no secondary containment, the containers (many are steel drums) are directly on the unsealed concrete floor and there is no physical barrier to protect the containers from vehicular traffic which includes several fork lifts, delivery trucks and private vehicles. The floor slopes slightly from east (where the containers are located) to the west where the main overhead garage door is located. The distance from the containers to the garage door is approx. 20 ft. The LDA uses salt on the roads in the winter time which is transported into the warehouse from vehicles which may result in corrosion of the steel drums whilst being located on the concrete floor. Building 7210 is currently heated as long as the truck parts distributor leases the building. The roof is intact and there are no floor drains. In the winter the area adjacent to the containers is used for leasing winter storage of RVs. The 5 million gallon water tower for the LDA potable water is located approx. 200 ft from the ware house garage door. The circa 1960 underground water distribution pipes are within 20-50 ft of the ware house garage door. Private drinking water wells are located approx. 12,000 ft to the south and the Limestone Municipal wells are approx. 18,000 ft to the south west of Building 7210. The geology consists of fractured limestone.

### Field Sampling and Analysis

Matrix/Analytical Parameter	Field Instrumentation				
	CGI/O <sub>2</sub>	RAD	PID	FID	Other

Background Readings: N/A

Air:

Soil:

Surface:

Water:

Tanks:

Drums:

Vats:

Lagoons:

## REMOVAL SITE INVESTIGATION

**Spillage:**

**Run Off:**

**Piles:**

**Sediments:**

**Groundwater:**

**Other:**

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### Field Quality Control Procedures

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☒ **SOP Followed**

☐ **Deviation From SOP**

**Comments:**

## REMOVAL SITE INVESTIGATION

### Description of Sampling Conducted

N/A

### Analyses

Analytical Parameter	Media	Laboratory
<input type="checkbox"/> VOC	<input type="checkbox"/> AIR	<input type="checkbox"/> NERL
<input type="checkbox"/> PCB	<input type="checkbox"/> WATER	<input type="checkbox"/> CLP
<input type="checkbox"/> PESTICIDE	<input type="checkbox"/> SOIL	<input type="checkbox"/> PRIVATE
<input type="checkbox"/> METALS	<input type="checkbox"/> SOURCE	<input type="checkbox"/> SAS
<input type="checkbox"/> CYANIDE	<input type="checkbox"/> SEDIMENT	<input type="checkbox"/> SOW
<input type="checkbox"/> SVOC		<input type="checkbox"/> Field
<input type="checkbox"/> TOXICITY		
<input type="checkbox"/> DIOXIN		
<input type="checkbox"/> ASBESTOS		
<input type="checkbox"/> OTHER		

Analytical results: n/a

### Receptors

#### Comments

- ☒ **Drinking Water** ☐ **Private:** wells w/I 12,000 ft  
☐ **Municipal:** Limestone Municipal wells w/I 18,000 ft
- ☒ **Groundwater:** The potential exists if the containers are breached AFFF would be discharged onto the building floor and adjacent soils.
- ☒ **Unrestricted Access:** Access to the warehouse is available to the public, delivery vehicles and forklifts operating proximate to the containers which are not protected from vehicle collisions.
- ☐ **Population in Proximity:**
- ☐ **Sensitive Ecosystem:**
- ☒ **Other:** If the AFFF was released and the discharge released into the adjacent soil the AFFF would likely migrate to the LDA potable water distribution system which is within 20-50 ft north of the warehouse garage door and 10-15 ft bgs.

### Additional Procedures for Site Determination

- ☐ **Biological Evaluation** ☐ **ATSDR**

## **REMOVAL SITE INVESTIGATION**

To be determine by the Task Monitor.



## REMOVAL SITE INVESTIGATION

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### Site Determination

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Depending on further information, criteria that may be met by the site include 40 CFR 300.415 [b] [2], parts:

- ☐ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- ☒ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- ☒ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- ☐ Threat of fire or explosion.
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release.
- ☒ Other situations or factors that may pose threats to public health or welfare or the environment.

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### Report Generation

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**Originator:** Mike Nalipinski, OSC  
**Affiliation:** EPA R-1 EPRB  
**TDD No.:** n/a

**Date:** 17 July 2019  
**Telephone:** (617) 680-5469  
**Task No.:** n/a









