



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: June 10, 2026

SUBJ: Request for a Removal Action at the Yankee Stripper Site
Rockport, Knox County, Maine - **Action Memorandum**

FROM: John McKeown, On-Scene Coordinator
Emergency Response and Removal Section I

THRU: Catherine Young, Acting Manager
Emergency Response and Removal Section II

Bryan Olson, Acting Manager
Emergency Planning and Response Branch

TO: Bryan Olson, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this action memorandum is to request and document approval of the proposed removal action at the Yankee Stripper Site (the site), which is located at 407 West Street in Rockport, Knox County, Maine. Hazardous substances present in solvent recovery tanks, 55-gallon drums, and other various containers, if not addressed by implementing the response actions selected in this action memorandum, will continue to pose a threat to human health and the environment.

There are no nationally significant or precedent-setting issues associated with this site, and there has been no use of the On-Scene Coordinator's \$200,000 warrant authority.

CERCLIS ID# : MED061850855
SITE ID# : C114
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

On February 9, 2026, the Maine Department of Environmental Protection (MEDEP) requested EPA assistance with the Yankee Stripper Site located at 407 West Street in Rockport, Knox County, Maine. The Yankee Stripper facility (site) is no longer operating, and in 2025, the Town of Rockport acquired the property through a tax lien foreclosure process. Yankee Stripper operated a furniture stripping and refinishing business at this location since 1988. Prior to 1988, MarMaine Inc. also operated an antique stripping and refinishing business at the facility, under the name Yankee Stripper. The building was constructed in the mid-1950s.

In November 2003, MEDEP conducted an inspection at the Yankee Stripper facility pursuant to its delegated authority under the Resource Conservation and Recovery Act (RCRA), 40 C.F.R. Parts 260-262 and 264. The inspection confirmed that the facility generated RCRA hazardous waste including F003 listed waste (spent non-halogenated solvent waste), D001 (ignitable characteristic waste) and D008 (lead toxicity characteristic waste). The inspection identified several violations, mostly associated with employee training, facility planning and notifications.

The town provided EPA with written access to the property on March 20, 2026. On April 22, 2026, EPA conducted an initial visit to assess conditions and determine requirements for a site inspection. EPA was joined by representatives from MEDEP, the town, two members of the Region 1 Superfund Technical Assistance and Response Team and individuals familiar with the property. During the site visit, EPA observed full drums of xylene and dimethylformamide, spent solvent recovery tanks, and many additional containers located inside and outside the building.

On May 6, 2026, EPA, joined by representatives from MEDEP, the town, and three members of the Region 1 START conducted a site inspection. START collected waste samples from drums labeled xylene and dimethylformamide, paint stripping solvents from process recovery tanks, sludge and soil samples located in the crawl space under the recovery tanks and several surface soil samples around the exterior of the building. EPA conducted field hazard waste categorization under RCRA ([40 C.F.R. § 261.31](#)) of the waste samples and confirmed D001 characteristic of ignitability for all collected waste samples. All samples were delivered to the EPA New England laboratory for analysis.

2. Physical location

The Yankee Stripper Site is located at 407 West Street, Rockport, Knox County, Maine and is described by the Town of Rockport Assessing Department as Map/Lot 026-217. The geographic coordinates of the site are latitude 44°11'06.67" North and longitude 69°06'53.65" West, as measured from the approximate center of the property.

3. Site characteristics

The Site is composed of one parcel and encompasses 0.64-acres (approximately 27,800 square feet) containing a one-story building and a septic tank easement. The building was constructed in 1955 and appears to be in structurally good condition, but portions of the floor in the process areas have been reinforced with wood and other materials. A crawl space exists under the primary floor.

Located on West Street (ME-90), the site is bordered to the west by an antiques store, to the east by a boat dealer (Port Harbor Maine of Rockport), to the north by a wooded area, which separates the property from a residential area, and to the south by commercial properties and a small stream that feeds into the Goose River.

Historically, a business named Yankee Stripper began operating at the site in 1972 as an antique refinishing business, in 1988 the business was transferred to a new owner and became a commercial furniture and stripping and refinishing operation until August 2025. Approximately 50% of the building is used as a furniture showroom, storage and administrative space. The furniture stripping and finishing area (process area) occupies the remaining 50% of the building.

The process area of the building consists of a stripping area and a spray-painting area. The stripping area has a large stripping tray which uses xylene and dimethylformamide to strip unpainted furniture. The facility reuses the stripping solvent until it is too contaminated for any future use. When the operator determines the solvent can no longer be used in the stripping process, it is removed as hazardous waste. The typical lifespan of solvent is three to five years. The waste generated from this process consists of spent non-halogenated solvents and sludges (Figure 1). EPA observed water and sludge in the vicinity of the process area and solvent recovery tanks. The containers of hazardous substances are located within the process area.

Based on EPA Region 1's Emergency Response Viewer, within a one-mile radius there is a:

- daytime population of 5,751;
- nighttime population of 3,826;

and there are:

- 3 public/private schools; and
- 2 childcare centers.



Figure 1 Process Area Furniture Stripping

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

EPA's sampling documented the presence of hazardous substances, as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9601(14) and 40 C.F.R. § 302.4 stored in various containers, including 55-gallon drums of xylene and dimethylformamide, and a solvent recovery tank of non-

halogenated spent solvents classified as a F003 hazardous waste under RCRA¹. All waste samples collected are classified as RCRA D001 ignitable characteristic waste based on hazard categorization procedures conducted during the investigation. The process area contains numerous 5-gallon and smaller containers with solid and liquid contents, believed to be furniture stripping chemicals or RCRA F003 sludge removed from the process tray or solvent recovery tank. A summary of onsite hazardous waste is displayed in the table below.

In addition to sampling containers of hazardous waste, EPA collected soil samples near a stack of empty drums and a single empty tank located outside of the building. EPA also collected soil samples from under the process area in the building crawl space to determine if RCRA F003 waste may have leaked through the floor and into the soil under the furniture stripping process area of the building during the 50-plus years of operation. EPA will assess soil contamination under the process area and may address isolated areas of contaminated soil to remove the source from the property and prevent migration to groundwater.

The following table summarizes the findings of EPA's investigation.

Sample Location	Container Type	Hazardous Substances	RCRA Characteristic Waste
Process Area / Furniture Stripping Room	Seven 55-gallon drums (xylene label)	Xylene	RCRA D001 characteristic waste (Ignitable)
Process Area / Furniture Stripping Room	Three 55-gallon drums (DMF label)	Dimethylformamide	RCRA D001 characteristic waste (Ignitable)
Process Area / Furniture Stripping Room	Spent solvent recovery tank (RCRA F003 listed waste)	RCRA F003 spent non halogenated solvents	RCRA D001 characteristic waste (Ignitable)>800ppm total xylenes
Process Area / Furniture Stripping and spray-painting rooms	Approximately 100 containers less than 1 gallon volume.	Miscellaneous flammable solvents and stains (paint thinner, turpentine, linseed oil)	RCRA D001 characteristic waste (Ignitable)

¹ CERCLA defines "hazardous substance" to include "any hazardous waste having the characteristics identified under *or listed* pursuant to [RCRA]." 42 U.S.C. § 101(14)(C). F003 is a listed hazardous waste under RCRA.

Process Area / Furniture Stripping Room	Approximately thirty 5-gallon containers of solids.	Sludge, ML Campbell Shellac,	Not tested during Site Investigation
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The following substances identified in various containers at the site are hazardous substances as defined by Section 101(14) of the CERCLA and 40 C.F.R. § 302.4:

- Xylene;
- Dimethylformamide;
- RCRA F003 listed waste; and
- RCRA D001 characteristic waste (Ignitable).

The scope of the proposed time-critical removal action is to remove from the facility the CERCLA hazardous substances and RCRA hazardous waste materials exhibiting the D001 RCRA ignitability characteristic. If EPA identifies isolated areas of soil contaminated with listed RCRA F003 hazardous waste resulting from process or tank leakage during the years of operation, contaminated soil may be removed from the site to prevent any migration into the groundwater.

5. NPL status

The site is not currently on the National Priorities List and has not received a Hazardous Ranking System rating.

6. Maps, pictures and other graphic representations

Figures 2 and 3 below are photos taken during May 6, 2026, Site Investigation sampling event showing some of the containers of hazardous substances located at the site.



Figure 2 Drum containing Xylene



Figure 2 Miscellaneous <5-gallon containers of hazardous substances

B. Other Actions to Date

1. Previous actions

There is no record of prior EPA actions at the Yankee Stripper facility located in Rockport, Maine. EPA has been involved with other furniture stripping operations under the Yankee Stripper name, but these appear to not be connected to the Rockport Maine facility.

2. Current actions

The site is no longer operating as a furniture stripper and is owned by the town of Rockport. The doors of the facility are locked, but the property is not fenced and access is unrestricted. The only EPA activity at this time is the ongoing investigation documented in this Action Memorandum.

C. State and Local Authorities' Roles

1. State and local actions to date

Yankee Stripper began operations in December 1988, after purchasing the property from MarMaine Inc. The facility is classified by MEDEP as a large quantity generator with a generator ID# of MED061850855. During its years of operation, Yankee Stripper worked with MEDEP to meet the requirements of a large quantity generator under the State's RCRA program.

The most significant MEDEP activity at the site was a November 2003 inspection conducted under the State's RCRA program. MEDEP identified several violations during the inspection. The violations were mostly administrative related and included 1) failure to have a contingency plan designed to minimize hazards during a fire; 2) failure to establish relations with local authorities; and 3) failure to document a personnel training program for hazardous waste management. In December 2003, MEDEP issued a Notice of Violation to Yankee Stripper documenting the violations and providing a compliance plan.

In 2025, the town acquired the property through a tax lien foreclosure process. In the fall of 2025, an interested purchaser had an environmental consultant visit the property as part of a Phase I Environmental Site Assessment due diligence. The consultant notified MEDEP after observing numerous drums of waste, solvent recovery tank and other containers of unsecured waste related to the furniture stripping operation. MEDEP initially sent a letter to Yankee Stripper reminding the owner of the Maine regulations concerning closure requirements for

hazardous waste generators. The former owner did not meet the requirements, prompting MEDEP to request assistance from EPA.

2. Potential for continued state/local response

MEDEP will continue to provide EPA with technical support during the removal action as needed. The town has offered to provide support through services and security during the removal action as needed. Both MEDEP and Rockport have been present during the EPA investigation and EPA anticipates continued interest during the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

As described below, site conditions meet the general criteria for a removal action, as set forth in 40 C.F.R. §300.415(b)(1), in that “there is a threat to public health or welfare of the United States or the environment,” and in consideration of the factors set forth in 40 C.F.R. §300.415(b)(2) as described below.

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

The investigation at the site has documented the presence of hazardous substances and RCRA hazardous waste in improperly stored containers and in the solvent recovery tank, that pose actual and potential exposures to human populations to trespassers or any person entering the building. The site is in a mix-use area consisting of both residential and commercial properties. It is adjacent to an antique shop and within 1/8 of a mile of a residential neighborhood. The doors to the building are locked but the surrounding land is not fenced and access to the property is not restricted in any way.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

During the investigation, EPA documented the presence of CERCLA hazardous substances xylene and dimethylformamide in 55-gallon drums, smaller containers exhibiting RCRA characteristic D001 ignitable waste, and a solvent recovery tank with RCRA F003 spent non-halogenated solvent waste. The Yankee Stripper facility is no longer operating and maintaining the building or containers of hazardous substances and hazardous waste. The improper storage of these containers with hazardous substances and hazardous waste poses a threat of release.

Threat of fire or explosion [§300.415(b)(2)(vi)];

The building located onsite contains drums of xylene, dimethylformamide and smaller containers of RCRA D001 ignitable characteristic waste. The RCRA F003 spent non-halogenated solvent waste in the process area of the building is also a RCRA D001 ignitable characteristic waste. The location of these ignitable hazardous wastes in a large volume inside of an abandoned furniture stripping business creates a threat of fire or explosion at the facility. Moreover, the building does not contain any fire suppression equipment.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

There are no other available, appropriate federal or state response mechanisms. Rockport acquired the property through a tax lien foreclosure process but does not have the resources to address the hazardous substances located on the property.

IV. ENDANGERMENT DETERMINATION

EPA has determined that actual or threatened releases of hazardous substances or pollutants or contaminants from this site, if not addressed by implementing the response action selected in this action memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.” In accordance with OSWER Directive 9360.0-34, an endangerment determination is made based on “appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor, which is outlined and discussed in Section III above. Appropriate sources include, but are not limited to, EPA relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists.” EPA relied on the health and toxicology information from ATSDR’s toxicological profiles for the CERCLA hazardous substances.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The actions required to mitigate the threats outlined herein are given below. The proposed actions will protect public health, welfare, and the environment by removing the hazardous

substances stored in 55-gallon drums and smaller containers, the solvent recovery tank, and contaminated soil if needed. Specific removal activities will include the following:

- Conducting a site walk with the cleanup contractor;
- Establishing command post and support zone areas;
- Delineating work zones within the building;
- Establishing staging areas as needed;
- Identifying, collecting, inventorying and staging abandoned containers located within the building;
- Conducting hazard categorization activities;
- Emptying RCRA F003 spent non-halogenated solvent waste from the solvent recovery tank and preparing for transportation and disposal;
- Excavating isolated areas of soil contaminated with RCRA F003 spent non-halogenated solvents located under and near the process area, pending sampling analytical data and direct observation during removal action;
- Collecting samples for laboratory analysis to develop waste profiles;
- Arranging for transportation and disposal of hazardous substances and hazardous waste at EPA-approved off-site disposal facilities;
- Repairing response-related damage if necessary; and
- Demobilizing all personnel and equipment upon completing response activities.

2. Community relations

The On-Scene Coordinator will work with an EPA Community Involvement Coordinator on all public relations activities, such as press releases and fact sheets. EPA will work closely with the community, state, town, and local businesses.

3. Contribution to remedial performance

The cleanup proposed in this action memorandum is designed to reduce the threats to human health and the environment posed by the site. The actions taken would be consistent with and will not impede any future responses.

4. Description of innovative technologies and sustainable approaches

Greener cleanup practices should be considered for all cleanup projects (in accordance with the December 23, 2013, Memorandum, updated August 2, 2016, issued by Office of Land and Emergency Management, as well as the Region 1 Clean and Greener Policy for Contaminated Sites). Greener cleanups use practices that lessen the environmental impacts of cleanup actions

and maximize environmental and human benefit. Alternative technologies and sustainable approaches will be considered and used, as appropriate, throughout this removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Pursuant to 40 C.F.R. Section 300.415(j), removal actions shall, to the extent practicable considering the exigencies of the situation, attain ARARs. EPA has been working in coordination with MEDEP to identify applicable state ARARs. Current identified ARARs include, but are not limited to, those listed below.

Federal ARARs:

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S. Also, includes storm water standards for construction sites over one acre and although the removal action performed on less than one acre, removal activities will be managed to prevent stormwater discharge from the site.

Clean Water Act, 40 C.F.R. Sections 122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

Maine ARARs:

Resource Conservation and Recovery Act, Subtitle C: (40 C.F.R. Parts 260-262 and 264): Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure. Maine is delegated to administer RCRA through its state statute and regulations promulgated under it. Asbestos is identified as a special waste under the Maine Hazardous Waste, Septage and Solid Waste Management Act, 38 MRSA § 1301 et seq. Statutory requirements for generating/managing hazardous and solid waste during building demolition will be complied with.

Maine Erosion and Sedimentation Control Act; Stormwater Management Rules (38 MRSA 420-C, D; 06-096 CMR 500): if the removal action includes exposing soils or other earthen materials then measures shall be taken to prevent unreasonable erosion of soil or sediment beyond the project site or into a protected natural resource as defined in Section 480-B. Erosion control measures must be in place before the activities begins.

The On-Scene Coordinator will coordinate with state officials to identify additional state ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the

On-Scene Coordinator will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

Potentially responsible parties identified for this site will be provided an opportunity to finance or complete this removal action in coordination with EPA. If such a party cannot finance or complete this action, EPA will start the cleanup as soon as possible after this action memorandum is signed and funds are obtained. The work is expected to take three months.

B. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor ² Interagency Agreement		\$220,000.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$80,000.00
Extramural Subtotal		\$300,000.00
Extramural Contingency	20%	\$60,000.00
TOTAL, REMOVAL ACTION CEILING		\$360,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase public health risks due to the potential contact threat posed by the release and/or threat of release of CERCLA hazardous substances at and from the site. The absence of a removal action described herein will cause conditions at the site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this site.

² Emergency Rapid Response Services

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$360,000 (extramural costs) + \$60,000 (EPA intramural costs) = \$420,000 X 1.3393 (regional indirect rate) = **\$562,506**³.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Yankee Stripper Site in Rockport, Maine, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the site administrative record to be established.

Conditions at the site meet the National Contingency Plan Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

³Direct Costs include direct extramural costs \$360,000 and direct intramural costs \$60,000. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared and is expressed as a percentage of the 33.93% (effective January 6, 2025) x \$420,000, consistent with EPA's full cost accounting methodology. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$360,000.

APPROVAL: _____

DATE: _____