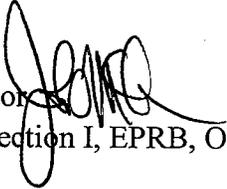


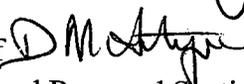


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: 7 July 2008

SUBJ: Site Investigation Closure Memorandum
Stenton Trust Mill Drum Site
13 River Street
Sanford, Maine

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

THRU: David McIntyre, Chief 
Emergency Response and Removal Section I, EPRB, OSRR

TO: Stenton Trust Mill Drum Site File

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 Stenton Trust Mill Drum Site ("Site") in Sanford, 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 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 analytical results generated by Credere Associates as part of an Environmental Site Assessment (ESA) Phase II completed for Southern Maine Regional Planning Commission (SMRPC) under an EPA Region 1 Brownfields Grant. Sampling conducted December 20, 2007 and January 15, 2008 (Transformer PCB analysis).

- ii. Review of photographs taken by Mr. Andy Slusarski of MEDEP on January 23, 2008.
 - iii. Review of SMRPC Report, "Jacobs Edwards and Kelcey, Phase I Environmental Site Assessment – Rev 1, Stenton Trust, 13 River Street, Sanford, Maine, September 27, 2007.
 - iv. Interviews with: Mr. Andy Slusarski and Stephen Brezinski MEDEP – regarding general site history, conditions and enforcement actions. Interviews with: Mr. Peter Cutrer, Sanford Fire Marshal – regarding Stenton Trust Mill assessment of fire hazard.
 - v. EPA's Site Investigation on April 16 and 17, 2008.
 - vi. Generating a PA/SI report by EPA's contractor, "Weston Solutions, Removal Program PA/SI Report for the Stenton Trust Mill Site, Sanford, York County, Maine, 16 and 17, April 2008."
 - vii. Completing PA and SI forms dated 13 June 2008.
- 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

Ignitable and corrosive chemicals

Various sizes and condition of containers throughout the structure.

PCBs [Arochlor 1260]

Five inoperable transformers located along east side of property.

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 x

- b. Endangerment to the ecosystem:

Threat _____ No Threat x 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.

- (x) 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.
 - (x) 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.
 - (x) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - (x) Threat of fire or explosion.
 - (x) 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.
- b. 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.

The Stenton Trust Mill is located adjacent to residential and commercial properties in the middle of Sanford, Maine. The majority of the mill structure is abandoned. Numerous containers of hazardous substances are located throughout the building. The majority of the containers are located in the basement and first floor along the east side of the building. The containers range in type, condition and size (one pint to 55-gallon drums). The building is not climate-controlled and the owner of the building does not appear to have the resources to manage the containers. Several 55 gallon drums are located outside of the building near the loading dock and five inactive transformers containing PCB-laden oil are located along the east side of the property. The property is not fenced and the building is unlocked, allowing possible access to the hazardous substances. Two businesses (custom motorcycle shop and wooden toy manufacturer) currently operate out of a small portion of the structure.

The conditions at the Site pose a significant threat to residents and workers located at or near the property. The gradual release of hazardous materials from unmanaged containers inside of and surrounding the structure poses a threat to tenant workers within the structure, unauthorized transient populations entering the property and residents located adjacent to the property. The very real threat of fire and possibly explosion (as assessed by Sanford Fire Department) creates the possibility of a large-scale chemical fire in the middle of an urban area.

- c. 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 x Non Time-Critical___

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.
- (x) 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.

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)
Cheryl O'Halloran, EPRB, OSRR (w/o attachments)
Tom Condon, EPRB, OSRR (w/o attachments)
Andy Slusarski, Maine DEP (with attachments)
Marcus Holmes, BROWNFIELDS, OSRR (with attachments)

Encl: PA/SI Report