

**REMOVAL PROGRAM  
AFTER ACTION REPORT  
FOR THE  
STENTON TRUST MILL DRUM SITE  
SANFORD, YORK COUNTY, MAINE  
3 SEPTEMBER 2008 THROUGH 30 SEPTEMBER 2008**

Prepared For:

U.S. Environmental Protection Agency  
Region I  
Emergency Planning and Response Branch  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

CONTRACT NO. EP-W-05-042

TDD NO.: 08-07-0001

SITE ID.: 01FA

TASK NO.: 0430

DC NO.: R-5279

Submitted By:

Weston Solutions, Inc.  
Superfund Technical Assessment and Response Team III (START)  
3 Riverside Drive  
Andover, Massachusetts 01810

February 2009

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## **1.0 INTRODUCTION**

The following report, entitled *Removal Program After Action Report for the Stenton Trust Mill Drum Site, Sanford, York County, Maine, 3 September 2008 through 30 September 2008*, is a chronological summary of actions taken by the U.S. Environmental Protection Agency (EPA) Region I, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included mobilizing equipment to the Stenton Trust Mill Drum site (the Site); establishing the exclusion zone (EZ), contamination reduction zone (CRZ), and clean zone (CZ); relocating or removing non-hazardous debris to access work and equipment staging areas; conducting air monitoring; documenting and photodocumenting site conditions; staging all hazardous, universal, and electronics waste in a centralized location for disposal; removing and disposing of transformers located along the eastern portion of the property; coordinating disposal of potentially hazardous wastes at EPA-approved facilities; and demobilizing personnel and equipment.

## **2.0 SITE CONDITIONS AND BACKGROUND**

### **2.1 Site Location and Description**

The Site is located at 13 River Street in Sanford, York County, Maine (ME). The geographic coordinates of the Site, as measured from its approximate center, are 43° 26' 33" north latitude and 70° 46' 23" west longitude [see Appendix A – Site Location Map (Figure 1)]. The Site is depicted on the Town of Sanford, ME Tax Assessor's Map Number (No.) J29, as Lot No. 29. The 6.8-acre site is zoned by the Town of Sanford, ME Planning & Community Development Department for Industrial Reuse (IR). The Site is bordered to the west by River Street; to the north by residential properties; to the east by the York County Community Center (Town of Sanford, ME Tax Assessor's Map No. J29, Lot No. 18B); and to the south by a vacant parcel (Town of Sanford, ME Tax Assessor's Map No. J29, Lot No. 18C), a property containing a one-story warehouse building (Town of Sanford, ME Tax Assessor's Map No. J29, Lot No. 18A), and High Street.

The Site consists of a five-story former mill building, a one-story garage, and unpaved access roads and parking areas. The approximately 270,000-square-foot former mill building encompasses approximately 75% of the property and consists of two five-story towers [referred to by Weston Solutions, Inc., Superfund Technical Assessment and Response Team (START) as the East and West Towers) and a one-story center section. The on-site building also contains a basement, which is located beneath the entire building. The majority of the first floor of the on-site building is occupied by a toy manufacturer. The remainder of the on-site building is currently vacant. The one-story garage is located on the northwestern portion of the property and is utilized as storage space. At the initiation of the EPA Removal Action, there was a transformer pad located east of the on-site building. The transformer pad contained five 6.4-foot General Electric (GE) transformers; three 6.5-foot Westinghouse Electric (Westinghouse) transformers; and three 4.4-foot GE transformers. In addition, two additional 6.4-foot GE transformers were located on the loading dock of the on-site building [see Appendix B – Site Map (Figure 2)]. Vehicular and pedestrian access to the Site is unrestricted. At the initiation of the EPA Removal Action, the property was owned by Gateway Properties, LLC.

## **2.2 Site History/Previous Actions**

In March 1993, ENPRO Services, Inc. (ENPRO) completed an Environmental Property Assessment of the Site. During the 1993 Environmental Property Assessment, ENPRO personnel noted that the on-site building was occupied by a shoe manufacturer; a rubber products manufacturer [Expanded Rubber Products, Inc. (which is listed in the US EPA Envirofacts database)]; a tarp and line fabricator; and several companies utilizing space throughout the building for storage. As part of the Environmental Property Assessment, groundwater sampling activities were completed at the Site. Analytical results of the groundwater sampling indicated the presence of elevated concentrations of numerous volatile organic compounds (VOCs), including tetrachloroethylene [also referred to as perchloroethylene (PCE)]; trichloroethylene (TCE); 1,2-dichloroethene (1,2-DCE); and methyl-tert butyl ether (MTBE). Additional information regarding the location of the groundwater monitoring wells sampled, types of analyses, etc., was not found in available file information.

In May 1994, EPA and Maine Department of Environmental Protection (ME DEP) personnel conducted an inspection of the Site. During the on-site inspection, EPA and ME DEP personnel observed that polychlorinated biphenyl (PCB)-containing materials (START assumes that this refers to the on-site transformers), which contained greater than 50 parts per million (ppm) of PCBs, were not properly labeled with content information and storage dates. In addition, it was determined by EPA and ME DEP personnel that the current property owner of the Site was not licensed to store, transport, process, or dispose of PCB-containing materials. In addition, it was determined that the PCB-containing material was stored on site longer than legally allowed and that a PCB spill had occurred which was not reported or remediated in compliance with applicable regulations.

In November 1995, ENPRO personnel removed three underground storage tanks (USTs) located on the Site. The exact location of the removed USTs was not found in available file information. According to available file information, one 10,000-gallon steel, fuel-containing UST and two 8,450-gallon steel, oil-containing USTs were removed. During UST removal activities, ENPRO personnel noted that the excavation of one of the 8,450-gallon USTs indicated signs of heavy staining of the surrounding soils. ENPRO personnel later verified that the surrounding soil was contaminated with petroleum products. The excavation of the additional 8,450-gallon UST also exhibited signs of petroleum-contaminated soil. As part of UST removal activities, ENPRO personnel excavated a total of approximately 285 tons of petroleum-contaminated soil.

In February 2007, the Campbell Environmental Group completed a Limited Subsurface Investigation of the Site. As part of the investigation, the sewer and drain lines were mapped; a geophysical survey was conducted; soil borings were advanced throughout the property; soil samples were collected from the advanced soil borings; groundwater monitoring wells were installed throughout the property; and groundwater samples were collected from the groundwater monitoring wells. Further information regarding the Limited Subsurface Investigation, including analytical results of soil and groundwater samples, was not found in available file information.

On 2 April 2007, ME DEP issued a Notice of Violation (NOV) to the property owner of the Site based upon a ME DEP hazardous waste management inspection conducted on 9 January 2007. Violations noted in the NOV included improper container marking; improper storage of hazardous waste and hazardous materials; failure to conduct inspections; failure to report and remediate spills and discharges; and failure to maintain appropriate records and licenses.

In September 2007, Jacobs, Edwards, and Kelcey (JEK) completed a Phase I Environmental Site Assessment of the Site. In the Environmental Site Assessment report, dated 25 September 2007, JEK personnel reported that several businesses were occupying the on-site building, including a woodworking shop (Mill Stores, Inc., which is the only business still currently occupying space in the on-site building); a motorcycle shop; and a furniture refinishing business. During the Phase I investigation, JEK noted the following potential hazards present throughout the Site: potential asbestos-containing material (ACM) located on pipes throughout the on-site building; on-site chlorinated compounds; one potentially PCB-containing transformer; potential PCB and oil staining noted at numerous locations throughout the Site; and universal and hazardous waste, including fluorescent light bulbs, computer parts, paints, stains, lubricants, and cleaners located throughout the on-site building.

On 8 March 2008, a fire was reported within the on-site building. The Sanford Fire Department concluded that the fire had been deliberately started on the fourth floor of the East Tower of the on-site building and had then spread to the third floor, where a furniture refinishing company was in operation. The fire was contained to the third and fourth floors of the East Tower, and no structural damage to the on-site building was observed.

On 16 and 17 April 2008, EPA On-Scene Coordinator (OSC) John McKeown and EPA OSC Randy Rice, and START members John Burton, Eric Ackerman, Cheryl Henlin, and Meagan McGrath arrived at the Site to conduct Removal Program Preliminary Assessment/Site Investigation (PA/SI) activities. START personnel established a support zone and calibrated air monitoring instruments, including a Thermo Electron Corporation TVA-1000B equipped with a combination photoionization detector (PID)/flame ionization detector (FID), a MultiRae Plus combustible gas indicator/oxygen meter (CGI/O<sub>2</sub>), and a radiation meter (Micro R).

As part of the April 2008 Removal Program PA/SI, EPA and START personnel conducted a perimeter site walk; no readings above background levels were recorded on the air monitoring instruments. During the perimeter site walk, OSC McKeown designated 11 locations from which START would collect surface soil samples (SS-01 through SS-11). In addition to the perimeter site walk, EPA and START personnel also conducted a walk-through of the on-site building. Per the request of OSC McKeown, START personnel generated a comprehensive inventory of waste material present within the on-site building. OSC McKeown also selected nine drums that would be sampled by START (DP-01 through DP-09). The 11 surface soil samples were submitted to the EPA Office of Environmental Measurement and Evaluation (OEME) Laboratory, located in North Chelmsford, Massachusetts (MA), for VOC, semivolatile organic compound (SVOC), PCB, metals (including mercury), and cyanide analyses. The nine drum samples were all submitted to the EPA OEME Laboratory for PCB, pH, and flashpoint analyses. In addition, drum sample DP-09 was submitted to the EPA OEME Laboratory for VOC analyses.

Analytical results of START surface soil samples indicated the presence of elevated concentrations of the following (maximum concentrations in parentheses): three VOCs {1,2,4-trimethylbenzene [670 micrograms per Kilogram ( $\mu\text{g}/\text{Kg}$ )]}; 1,3,5-trimethylbenzene (710  $\mu\text{g}/\text{Kg}$ ); and para-isopropyltoluene (790  $\mu\text{g}/\text{Kg}$ ); 22 SVOCs [1-methylnaphthalene (3,000  $\mu\text{g}/\text{Kg}$ ); 2-methylnaphthalene (4,300  $\mu\text{g}/\text{Kg}$ ); 3&4 methylphenol (1,900  $\mu\text{g}/\text{Kg}$ ); acenaphthene (2,900  $\mu\text{g}/\text{Kg}$ ); acenaphthylene (11,000  $\mu\text{g}/\text{Kg}$ ); anthracene (16,000  $\mu\text{g}/\text{Kg}$ ); benzo(a)anthracene (27,000  $\mu\text{g}/\text{Kg}$ ); benzo(a)pyrene (32,000  $\mu\text{g}/\text{Kg}$ ); benzo(b)fluoranthene (26,000  $\mu\text{g}/\text{Kg}$ ); benzo(g,h,i)perylene (22,000  $\mu\text{g}/\text{Kg}$ ); benzo(k)fluoranthene (26,000  $\mu\text{g}/\text{Kg}$ ); benzoic acid (2,500  $\mu\text{g}/\text{Kg}$ ); carbazole

(11,000 µg/Kg); chrysene (28,000 µg/Kg); dibenz(a,h)anthracene (7,200 µg/Kg); dibenzofuran (6,900 µg/Kg); fluoranthene (80,000 µg/Kg); fluorene (8,100 µg/Kg); indeno(1,2,3-cd)pyrene (22,000 µg/Kg); naphthalene (18,000 µg/Kg); phenanthrene (71,000 µg/Kg); and pyrene (60,000 µg/Kg)]; one PCB [aroclor-1260 (1.8 mg/Kg)]; 18 metals {aluminum [8,100 milligrams per Kilogram (mg/Kg)]; antimony (17 mg/Kg); arsenic (22 mg/Kg ); barium (800 mg/Kg); beryllium (3.6 mg/Kg); cadmium (3.7 mg/Kg); calcium (42,000 mg/Kg); chromium (42 mg/Kg); cobalt (8.6 mg/Kg); copper (320 mg/Kg); iron (18,000 mg/Kg); lead (1,200 mg/Kg ); magnesium (3,900 mg/Kg); manganese (230 mg/Kg); mercury (0.098 mg/Kg); nickel (380 mg/Kg); vanadium (2,100 mg/Kg); and zinc (1,400 mg/Kg)}; and cyanide (4.8 mg/Kg). The maximum concentrations of VOCs, SVOCs, and metals were detected in samples collected from the area of the transformer pad located east of the on-site building. The maximum concentrations of metals were detected in samples collected throughout the property. One SVOC [benzo(a)pyrene] and two metals (arsenic and lead) were detected in START surface soil samples at concentrations exceeding ME DEP residential soil standards.

Analytical results of START drum samples indicated the presence of elevated concentrations of the following (maximum concentrations in parentheses): eight VOCs [1,2,4-trimethylbenzene (154,390,000 µg/Kg); 1,3,5-trimethylbenzene (39,320,000 µg/Kg); isopropylbenzene (6,410,000 µg/Kg); meta/para xylene (3,810,000 µg/Kg); naphthalene (5,720,000 µg/Kg); n-propylbenzene (18,390,000 µg/Kg); ortho xylene (9,790,000 µg/Kg); and styrene (3,640,000 µg/Kg)]. In addition, analytical results of the flashpoint analyses indicated that four of the drum samples were ignitable at less than 60° Celsius (C). Analytical results of the pH analyses indicated that two drum samples displayed a pH of less than or equal to 2 or greater than or equal to 12.

### 3.0 SUMMARY OF FEDERAL RESPONSE ACTIONS

#### 3.1 Organization of the Response

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) One Congress Street, Suite 1100 Boston, MA 02114-2023 (617) 918-1797 John McKeown	John McKeown	EPA On-Scene Coordinator (OSC) responsible for the initiation, oversight, and completion of all removal activities. The OSC coordinated with State and local officials.
Weston Solutions, Inc. Superfund Technical Assessment and Response Team (START) 3 Riverside Drive Andover, MA 01810 (978) 552-2115	Timothy Benton Bonnie Mace Alysha Lynch	START Site Personnel that provided the OSC with technical assistance, sampling support, analytical support, site documentation, site health and safety monitoring, air monitoring, and draft and final report preparation.
Shaw Environmental & Infrastructure (Shaw) Emergency Rapid Response Services (ERRS) 88C Elm Street Hopkinton, MA 01748-1656 (508) 435-9561	Pete Lutsic	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.
	Gary Benham	ERRS Transportation and Disposal (T&D) Coordinator.

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
Enpro Services, Inc. 12 Mulliken Way Newburyport, MA 01950 (978) 465-2050	Bill Sheriden	ERRS subcontractor Foreman responsible for the staging of on-site waste material and load-out of on-site hazardous and non-hazardous materials.
General Chemical Corporation/Clean Venture, Inc. 133 Leland St/ 1602 Concord St. Framingham, MA 01701 (508) 872-5000	Project Leader	ERRS subcontractor responsible for the disposal of on-site hazardous waste and transformers.

### **3.2 Mobilization and Site Preparation**

The site-specific Removal Program health and safety plan (HASP) was reviewed and signed by all on-site personnel prior to the commencement of site work. In addition, emergency telephone numbers and directions to the local hospital were posted, and site work zones were delineated. All site activities were performed in appropriate personal protective equipment (PPE) in accordance with the site-specific HASP. The site-specific HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Stenton Trust Mill Drum Site, Sanford, York County, Maine*. On 3 September 2008, the mobilization and staging of Shaw Environmental & Infrastructure (Shaw) Emergency Rapid Response Services (ERRS) equipment was initiated.

### **3.3 Chronology of Removal Activities**

On 29 July 2008, an Action Memorandum (AM) was signed by Richard Cavagnero, the Deputy Director of the Office of Site Remediation and Restoration, authorizing a Removal Action at the Site.

#### **Week of 25 August 2008**

EPA OSC John McKeown, ERRS personnel, and ERRS subcontractor personnel conducted the initial site walk. While on site, personnel discussed the scope of work and designated the appropriate work zones.

#### **Week of 1 September 2008**

EPA OSC McKeown, START Site Leader (SL) Timothy Benton, ERRS Response Manager (RM) Pete Lutsic, and ERRS subcontractor personnel (ENPRO) mobilized to the Site to conduct removal activities. ERRS and ENPRO personnel mobilized the following equipment to the Site: one Komatsu bobcat with bucket and forklift attachments; and one 20-foot Conex storage container. START, EPA, ERRS, and ENPRO personnel conducted daily health and safety and work plan meetings for the duration of removal activities.

START, ERRS, and ENPRO personnel conducted an additional site walk to further discuss and clarify the scope of work and schedule for the project. ERRS RM Lutsic designated the first floor of the East Tower to serve as the waste staging area prior to the transportation and disposal (T&D) of

all waste located throughout the on-site building. All hazardous and universal waste from locations throughout the on-site building would be transported to the waste staging area to await disposal.

ENPRO personnel initiated the waste collection activities through the on-site building. The hazardous waste (55-gallon drums, 5-gallon buckets, *etc.*) and universal waste (light bulbs and ballasts), which was spread throughout all floors of the East and West Towers, was transported to the waste staging area. At the completion of waste staging activities, the wastes were classified and separated (latex paints, oil-based paints, flammables, waste oils, virgin oils, dyes, adhesives, unknowns, *etc.*). START SL Benton conducted air monitoring activities throughout waste segregation activities utilizing a MultiRAE Plus [CGI/O<sub>2</sub>, hydrogen sulfide (H<sub>2</sub>S), carbon monoxide (CO), and VOC] meter; no readings above background levels were recorded.

ERRS personnel initiated brush clearing activities around the transformer pad located east of the on-site building. The transformer pad was surrounded by thick vegetation and a chain-link fence and contained nine PCB-containing transformers (six GE-manufactured and three Westinghouse Electric-manufactured). START SL Benton gathered necessary T&D information from the nine transformers.

START SL Benton photodocumented site activities for the duration of the Removal Action (see Appendix C – Photodocumentation Log).

### **Week of 8 September 2008**

ENPRO personnel completed transporting all the hazardous waste and universal waste, which was spread throughout all floors of the East and West Towers, to the waste staging area. In addition, ENPRO personnel transported all electronic waste present throughout the on-site building to two roll-off containers delivered by ENPRO. The two roll-off containers were delivered and staged north and south of the on-site building. The roll-off container staged north of the on-site building was loaded with electronic waste collected from the first through fifth floors of the East and West Towers. The roll-off container staged south of the on-site building was loaded with electronic waste collected from the basement of the on-site building.

An ERRS subcontracted electrician conducted de-energizing activities within the transformer pad located east of the on-site building. The transformers were de-energized in preparation of disposal activities from the Site.

ENPRO personnel also completed excavating an area of contaminated soil located east of the on-site building. According to ME DEP personnel, the excavated area was contaminated with petroleum product during UST removal activities. ENPRO personnel excavated an approximately 6-foot by 6-foot area, and containerized the waste soils in two 55-gallon drums. The area was backfilled with soil obtained from the southeastern portion of the Site. START conducted air monitoring throughout excavation activities; no readings above background were recorded.

Per the request of OSC McKeown, ENPRO personnel removed a concrete cover from a trench located along the floor of the basement located in the on-site building. START conducted air monitoring during the removal of the concrete cover; no readings above background were recorded. The trench appeared to be approximately 6 feet deep and extended the length of the eastern portion

of the basement of the on-site building. No liquid was observed within the trench, which appeared to be designed for former operations conducted on site.

ERRS and ENPRO personnel completed an inventory of all waste stored in the waste staging area. In addition, ERRS personnel collected samples to properly classify the waste for disposal. Once all waste was inventoried and classified, ENPRO personnel overpacked all on-site drums. A total of 45 drums were overpacked, using steel or polyethylene drums. The outside of each overpack drum was labeled and staged for disposal. In addition, all smaller containers were staged in preparation for laboratory packing (lab-pack) activities and T&D.

EPA and START personnel conducted a walk-through of the on-site building to ensure that all waste had been transported to the waste staging area. All regulated waste had been removed from the East and West Towers of the on-site building and was staged for disposal. In addition, EPA and START personnel discovered an electrical room located in a tunnel leading east from the basement of the on-site building. The electrical room housed one small Westinghouse transformer. The transformer appeared to be de-energized.

All on-site personnel demobilized from the site until the commencement of T&D activities.

### **Week of 29 September 2008**

EPA, START, ERRS, and ERRS subcontractor [General Chemical Corporation/Clean Ventures, Inc. (General Chemical)] personnel began lab-packing the smaller containers staged in the waste storage area. Clean Ventures, Inc., was the ERRS subcontractor for the disposal of the staged waste. All small containers were segregated by class and packed into cubic-yard boxes.

EPA, ME DEP, and ERRS personnel conducted a walk-through of the on-site building to further verify that all waste had been removed. During the walk-through, ME DEP personnel noted areas throughout the building that had broken fluorescent light bulbs. EPA requested that START personnel screen the areas of broken light bulbs with a Lumex Mercury Vapor Analyzer to ensure that high concentrations of mercury were not present; no mercury vapor readings above applicable standards were recorded.

General Chemical personnel completed the disposal of all overpacks and cubic-yard boxes stored in the waste staging area. In addition, General Chemical personnel completed the removal and disposal of the nine transformers present on the transformer pad located east of the on-site building. The disposal of all on-site waste, including the overpacks, cubic-yard boxes, and transformers, completed activities associated with the EPA Removal Action at the Site.

#### 4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

<b>Cost Category</b>	<b>Ceiling</b>	<b>Costs Incurred</b>	<b>Remainder</b>
<b>Regional Removal Allowance Costs</b>			
<b>ERRS</b>	<b>\$ 350,000</b>	<b>\$ 115,382</b>	<b>\$ 234,618</b>
<b>Other Extramural Costs Not Funded from the Regional Allowance</b>			
<b>START Contractor</b>	<b>\$ 70,000</b>	<b>\$ 22,665</b>	<b>\$ 47,335</b>
<b>Subtotal</b>	<b>\$ 420,000</b>	<b>\$ 138,047</b>	<b>\$ 281,953</b>
<b>Contingency Funding</b>	<b>\$ 42,000</b>	<b>\$ 0</b>	<b>\$ 42,000</b>
<b>Total Removal Project Costs</b>	<b>\$ 462,000</b>	<b>\$138,047</b>	<b>\$ 323,953</b>

This accounting of expenditures is an estimate based on figures known to the EPA OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

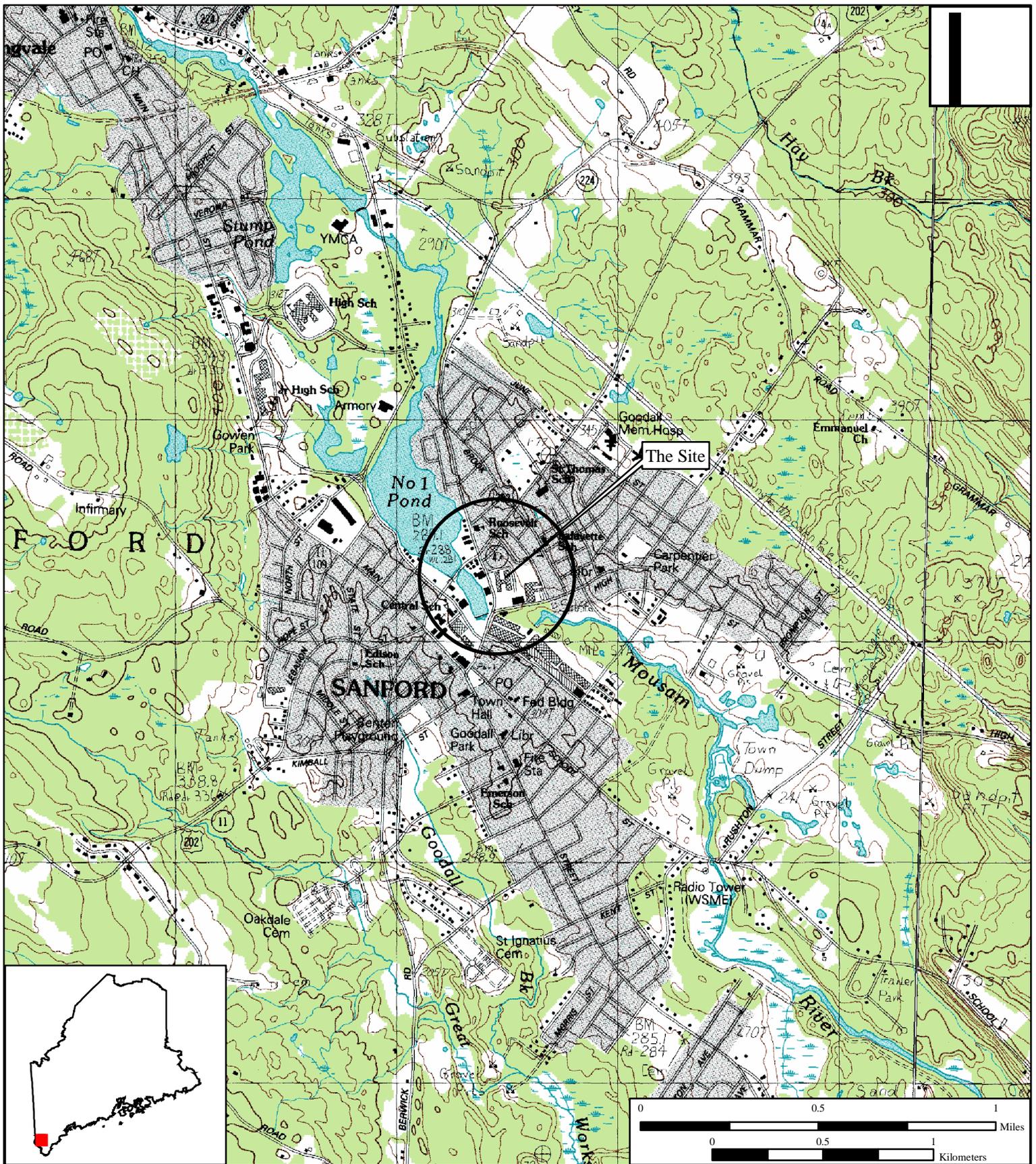
## Appendices

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Appendix A

Site Location Map (Figure 1)

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**Figure 1**

**Site Location Map**

**Stenton Trust Mill Drum  
13 River Street  
Sanford, Maine**

**EPA Region I  
Superfund Technical Assessment and  
Response Team (START) III  
Contract No. EP-W-05-042**

**TDD Number:** 08-07-0001  
**Created by:** T. Benton  
**Created on:** 29 September 2008  
**Modified by:** T. Benton  
**Modified on:** 26 November 2008

**Data Sources:**

Topos: MicroPath/USGS Quadrangle Name(s):  
 Sanford, ME; Merrill Mountain, ME  
 All other data: START

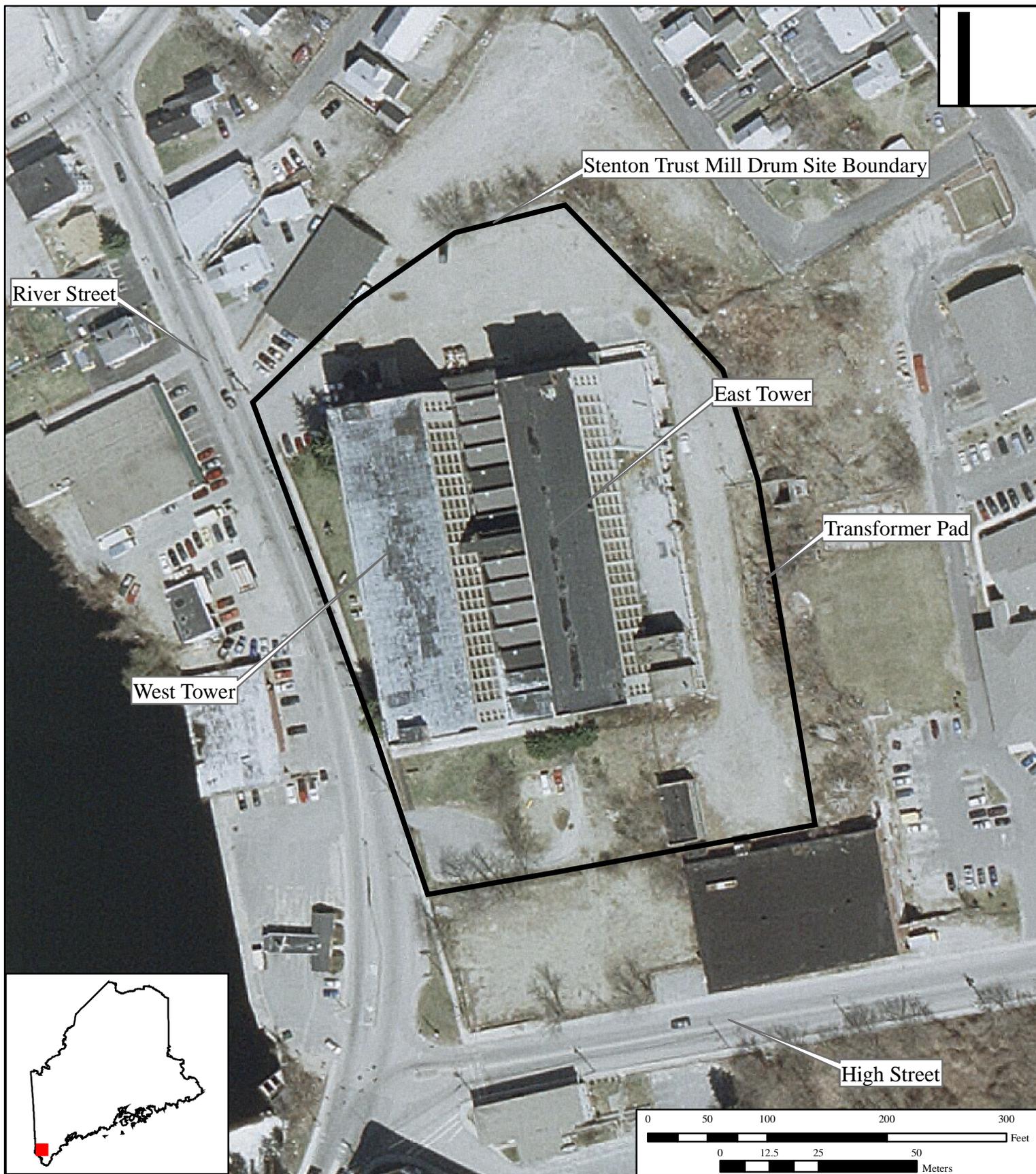


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## Appendix B

Site Map (Figure 2)

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**Figure 2**

**Site Map**

**Stenton Trust Mill Drum  
13 River Street  
Sanford, Maine**

**EPA Region I  
Superfund Technical Assessment and  
Response Team (START) III  
Contract No. EP-W-05-042**

**TDD Number:** 08-07-0001  
**Created by:** T. Benton  
**Created on:** 29 September 2008  
**Modified by:** T. Benton  
**Modified on:** 26 November 2008

**Data Sources:**

Maine Aerial Photographs (Town of Sanford)  
 All other data: START



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## Appendix C

### Photodocumentation Log

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**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the waste staging area located on the first floor of the East Tower of the on-site building.

**DATE:** 3 September 2008

**TIME:** 1221 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of drums and containers stored in the waste staging area located on the first floor of the East Tower of the on-site building.

**DATE:** 3 September 2008

**TIME:** 1222 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of polyethylene (poly) sheeting covering the floor of the waste staging area prior to waste collection activities.

**DATE:** 3 September 2008

**TIME:** 1403 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of poly sheeting covering the floor of the waste staging area prior to waste collection activities.

**DATE:** 3 September 2008

**TIME:** 1403 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the transformer pad, located east of the on-site building, prior to brush clearing activities. Photograph taken facing south.

**DATE:** 4 September 2008

**TIME:** 0759 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the transformer pad, located east of the on-site building, prior to brush clearing activities. Photograph taken facing southeast.

**DATE:** 4 September 2008

**TIME:** 0801 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



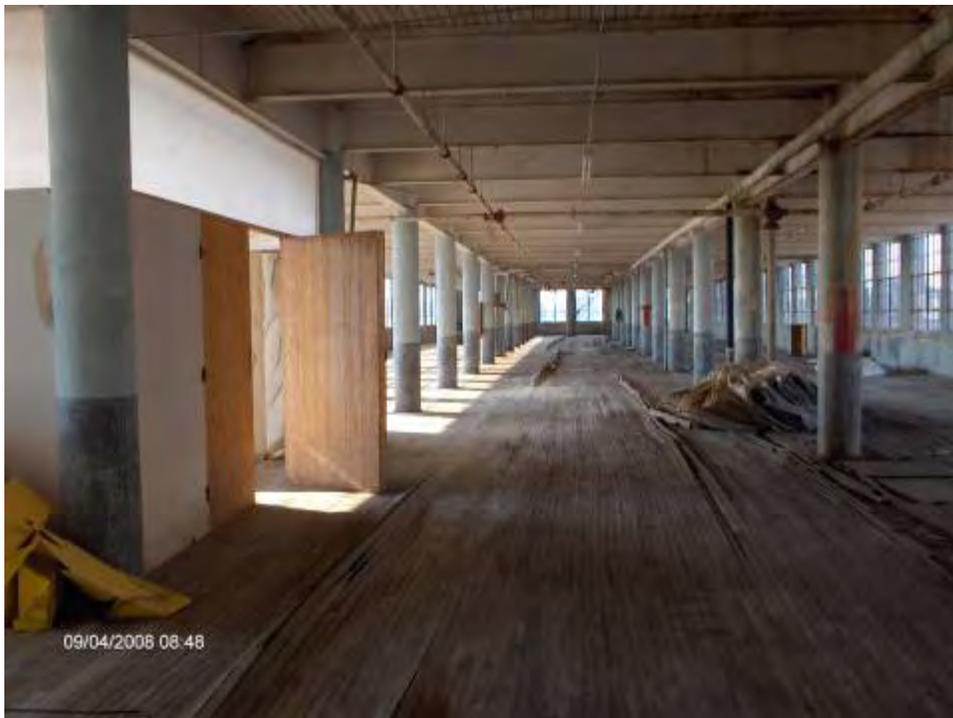
**SCENE:** View of the fifth floor of the East Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 0847 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the fourth floor of the East Tower of the on-site building.

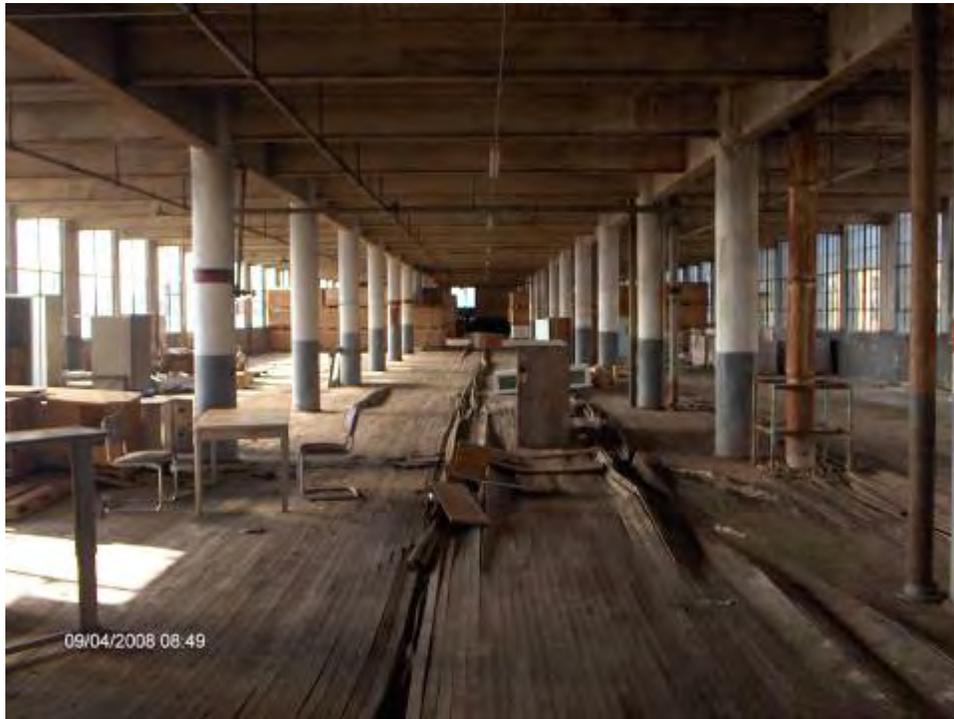
**DATE:** 4 September 2008

**TIME:** 0848 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the third floor of the East Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 0849 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of a portion of the second floor of the East Tower of the on-site building.

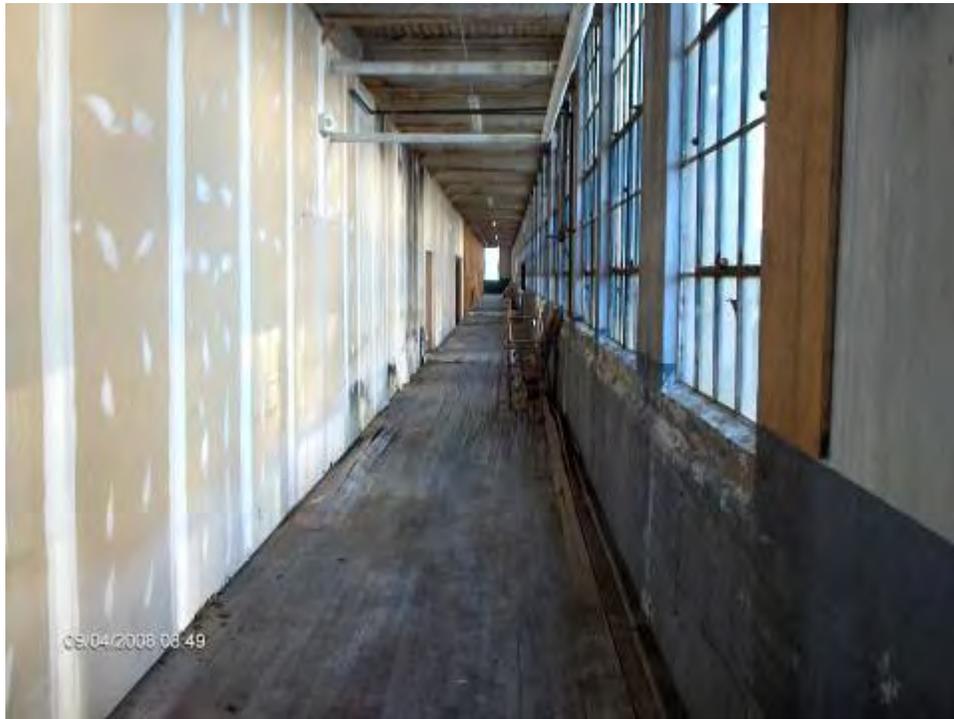
**DATE:** 4 September 2008

**TIME:** 0849 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



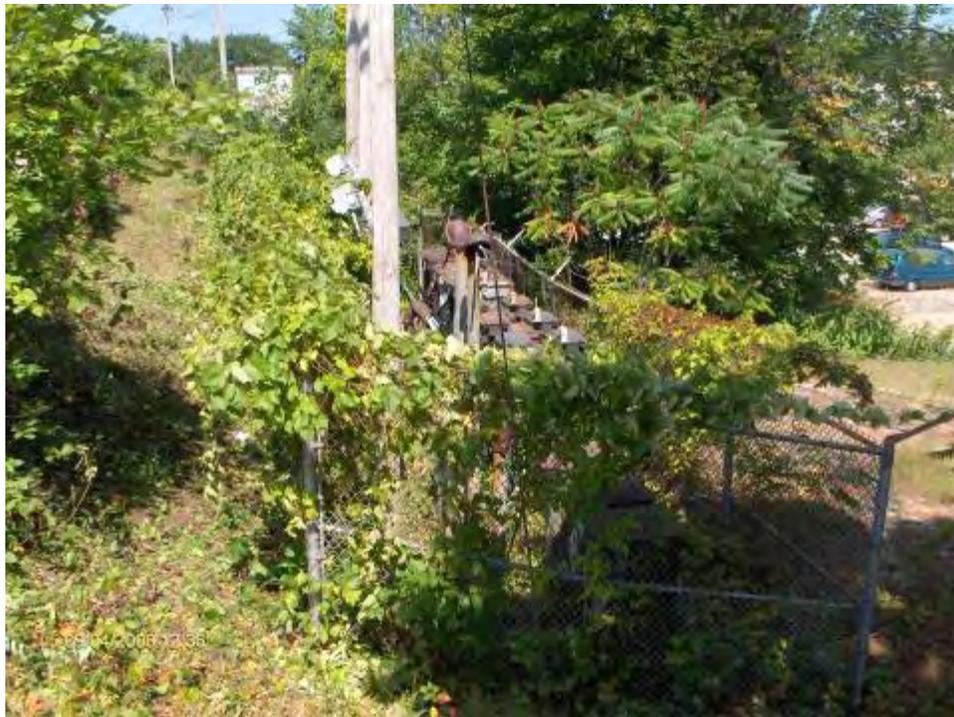
**SCENE:** View of a portion of the second floor of the East Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 0849 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the transformer pad, located east of the on-site building, during brush clearing. Photograph taken facing northeast.

**DATE:** 4 September 2008

**TIME:** 1236 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the on-site building with the East Tower on the left and the West Tower on the right. Photograph taken facing southwest.

**DATE:** 4 September 2008

**TIME:** 1239 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of paint waste, gathered from locations in the on-site building, staged on the poly sheeting covering the floor of the waste staging area.

**DATE:** 4 September 2008

**TIME:** 1242 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



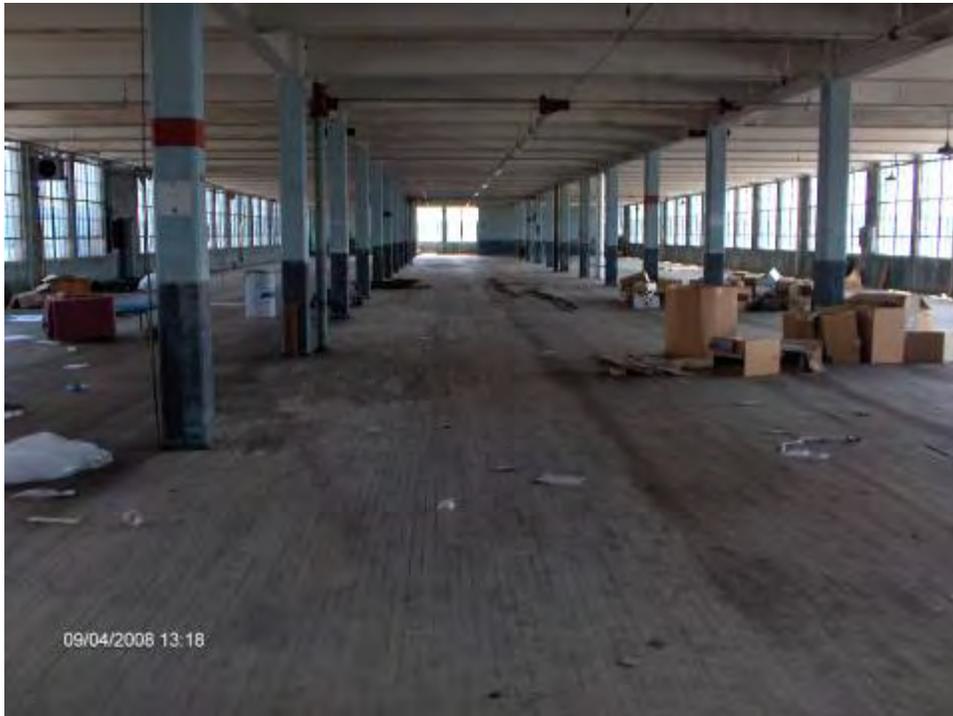
**SCENE:** View of paint waste, gathered from locations in the on-site building, staged on the poly sheeting covering the floor of the waste staging area.

**DATE:** 4 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1242 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of the fourth floor of the West Tower of the on-site building.

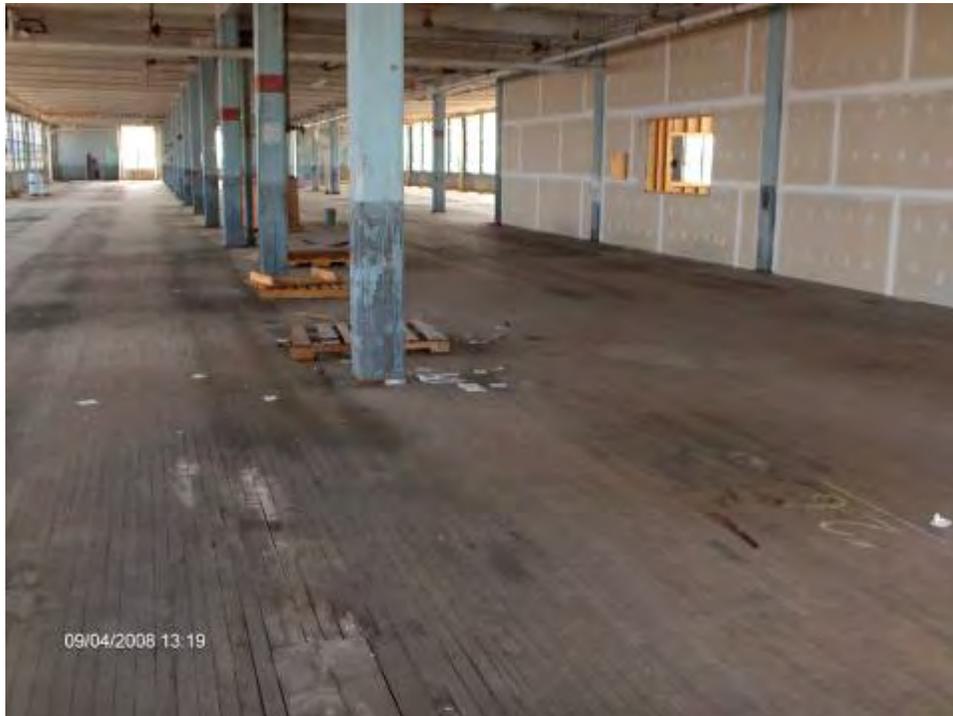
**DATE:** 4 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1318 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



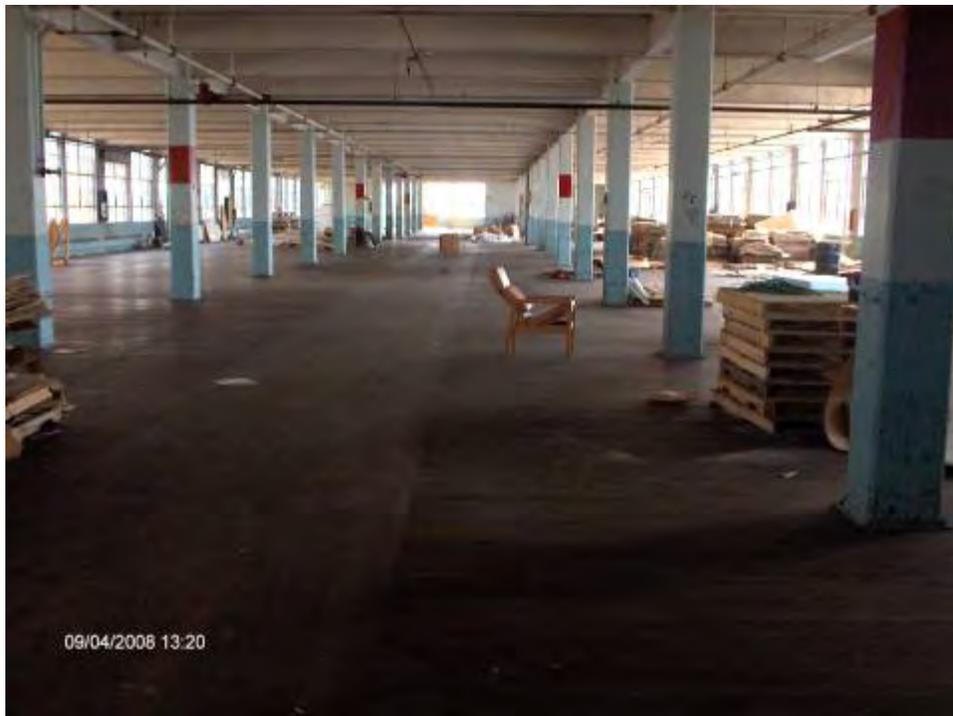
**SCENE:** View of the fifth floor of the West Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 1319 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the third floor of the West Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 1320 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of a portion (western section) of the second floor of the West Tower of the on-site building and electronic waste present on the floor surface.

**DATE:** 4 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1321 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of a portion (central section) of the second floor of the West Tower of the on-site building.

**DATE:** 4 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1321 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of a portion (eastern section) of the second floor of the West Tower of the on-site building.

**DATE:** 4 September 2008

**TIME:** 1321 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of fluorescent light bulbs, gathered from locations in the on-site building, stored in the waste staging area.

**DATE:** 5 September 2008

**TIME:** 1132 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the transformer pad, located east of the on-site building, following the completion of brush clearing activities. Photograph taken facing east.

**DATE:** 5 September 2008

**TIME:** 1459 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the transformer pad, located east of the on-site building, at the completion of brush clearing activities. Photograph taken facing east.

**DATE:** 5 September 2008

**TIME:** 1459 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the first roll-off container delivered to the southern portion of the site. The roll-off container was filled with electronic waste gathered from throughout the building. Photograph taken facing north.

**DATE:** 8 September 2008

**TIME:** 1440 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the excavation of petroleum-contaminated soil located adjacent to the East Tower of the on-site building. Photograph taken facing northwest.

**DATE:** 10 September 2008

**TIME:** 1352 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the excavation of petroleum-contaminated soil located adjacent to the East Tower of the on-site building. Photograph taken facing northwest.

**DATE:** 10 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1352 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of the Bobcat® gathering material to backfill the petroleum-contaminated soil excavation area located adjacent to the East Tower of the on-site building. Photograph taken facing southeast.

**DATE:** 10 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1352 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the petroleum-contaminated soil excavation area following backfilling activities. Photograph taken facing northeast.

**DATE:** 10 September 2008

**TIME:** 1359 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the petroleum-contaminated soil excavation area following backfilling activities. Photograph taken facing north.

**DATE:** 10 September 2008

**TIME:** 1359 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the second roll-off container delivered to the northern portion of the site. The roll-off container was filled with electronic waste gathered from throughout the building. Photograph taken facing southwest.

**DATE:** 12 September 2008

**TIME:** 0952 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of paint waste containers, gathered from the on-site building, segregated and staged on the poly sheeting covering the floor of the waste staging area.

**DATE:** 12 September 2008

**TIME:** 1010 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of paint waste containers, gathered from the on-site building, segregated and staged on the poly sheeting covering the floor of the waste staging area.

**DATE:** 12 September 2008

**TIME:** 1010 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the concrete slab covering a trench located along the eastern portion of the basement in the on-site building.

**DATE:** 12 September 2008

**TIME:** 1319 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



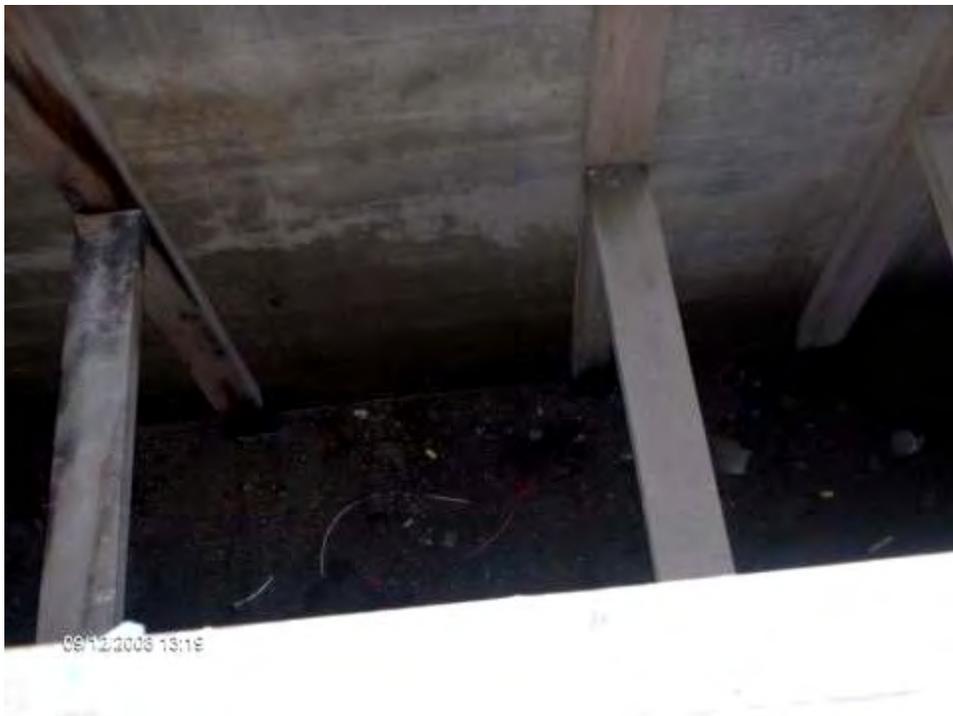
**SCENE:** View of the trench located along the eastern portion of the basement in the on-site building.

**DATE:** 12 September 2008

**TIME:** 1319 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View within the trench located along the eastern portion of the basement in the on-site building.

**DATE:** 12 September 2008

**TIME:** 1319 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



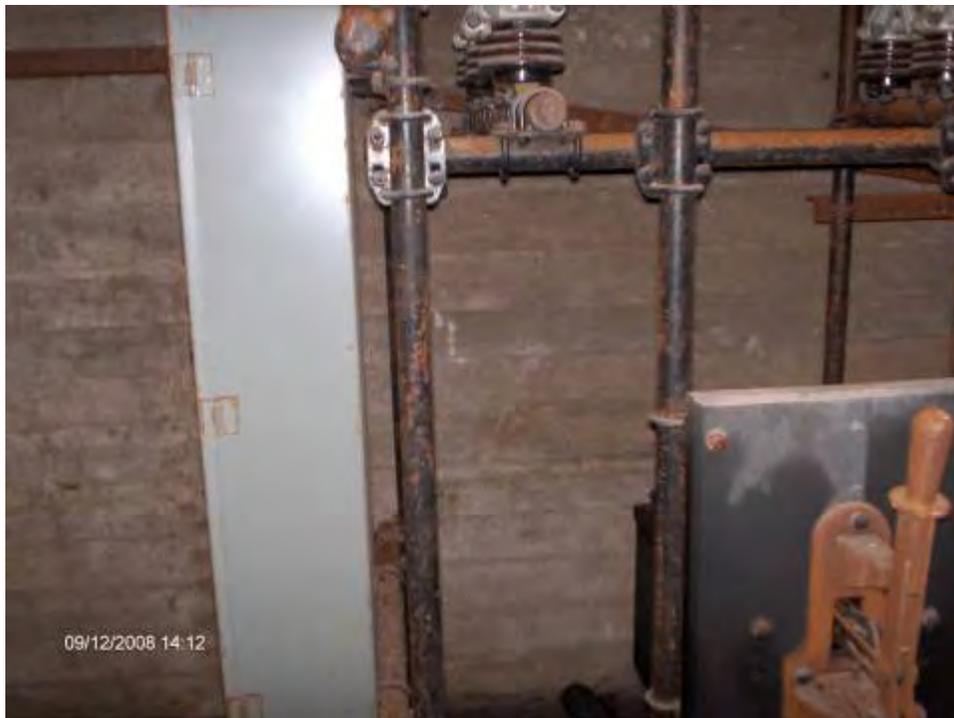
**SCENE:** View of transformers within the electric room located off of a tunnel in the eastern portion of the basement of the on-site building.

**DATE:** 12 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1412 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of transformers within the electric room located off of a tunnel in the eastern portion of the basement of the on-site building.

**DATE:** 12 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1412 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the tunnel within the electric room located off of the tunnel in the eastern portion of the basement of the on-site building.

**DATE:** 12 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1412 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of the overpacked drums in the waste staging area, following the completion of all waste collection activities from the on-site building.

**DATE:** 12 September 2008

**PHOTOGRAPHY BY:** T. Benton

**TIME:** 1521 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the overpacked drums in the waste staging area, following completion of all waste collection activities from the on-site building.

**DATE:** 12 September 2008

**TIME:** 1521 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22



**SCENE:** View of the overpacked drums, fluorescent light bulbs, and light ballasts in the waste staging area, following the completion of all waste collection activities from the on-site building.

**DATE:** 12 September 2008

**TIME:** 1521 hours

**PHOTOGRAPHY BY:** T. Benton

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the segregated and staged waste containers located in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1031 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of the segregated and staged waste containers located in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1032 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the segregated and staged waste containers located in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1032 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of the segregated and staged waste containers of latex paints located in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1032 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



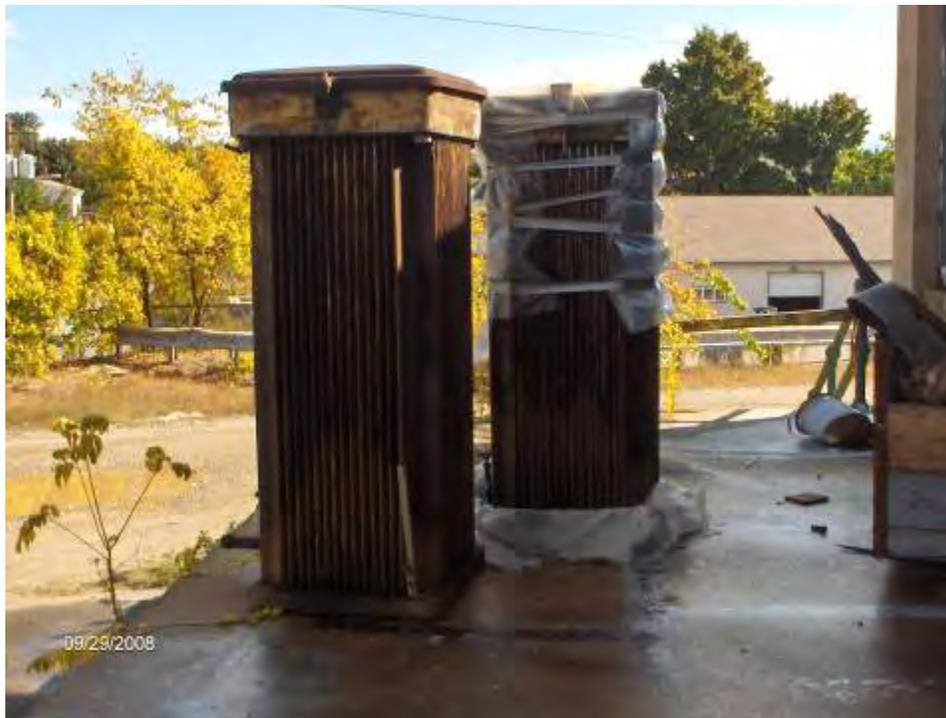
**SCENE:** View of the segregated and staged waste containers of waste oils located in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1032 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of the two transformers that were staged on the loading dock adjacent to the first floor of the East Tower of the on-site building prior to the EPA Removal Action. Photograph taken facing east.

**DATE:** 29 September 2008

**TIME:** 1035 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the transformer pad, located east of the on-site building, prior to the removal of the nine transformers. Photograph taken facing southeast.

**DATE:** 29 September 2008

**PHOTOGRAPHY BY:** B. Mace

**TIME:** 1105 hours

**CAMERA:** HP Photosmart M22



**SCENE:** View of the transformer pad, located east of the on-site building, prior to the removal of the nine transformers. Photograph taken facing southeast.

**DATE:** 29 September 2008

**PHOTOGRAPHY BY:** B. Mace

**TIME:** 1105 hours

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the poly overpack drums staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1356 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of steel overpack drums staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1356 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of steel overpack drums staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1356 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of steel overpack drums staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1356 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of empty (unused) steel overpack drums staged in the waste staging area.

**DATE:** 29 September 2008

**TIME:** 1357 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of the fluorescent light ballasts staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1357 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the packaged fluorescent light bulbs and ballasts staged in the waste staging area, prior to load-out activities.

**DATE:** 29 September 2008

**TIME:** 1357 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of waste containers, from the waste staging area, packed inside of a 1-cubic-yard box in preparation for disposal.

**DATE:** 29 September 2008

**TIME:** 1356 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of waste containers, from the waste staging area, wrapped on a pallet in preparation for disposal.

**DATE:** 29 September 2008

**TIME:** 1358 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22



**SCENE:** View of waste containers, from the waste staging area, on a pallet in preparation for disposal.

**DATE:** 29 September 2008

**TIME:** 1534 hours

**PHOTOGRAPHY BY:** B. Mace

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the crane that was used to extract the nine transformers from the transformer pad located east of the on-site building. Photograph taken facing south.

**DATE:** 30 September 2008

**TIME:** 0906 hours

**PHOTOGRAPHY BY:** A. Lynch

**CAMERA:** HP Photosmart M22



**SCENE:** View of the crane extracting one of the nine transformers from the transformer pad located east of the on-site building. Photograph taken facing southeast.

**DATE:** 30 September 2008

**TIME:** 0906 hours

**PHOTOGRAPHY BY:** A. Lynch

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the crane loading a transformer onto a flat-bed trailer after extracting it from the transformer pad located east of the on-site building. Photograph taken facing southeast.

**DATE:** 30 September 2008

**TIME:** 0908 hours

**PHOTOGRAPHY BY:** A. Lynch

**CAMERA:** HP Photosmart M22



**SCENE:** View of the transformer pad located east of the on-site building after the nine transformers had been removed. Photograph taken facing southeast.

**DATE:** 30 September 2008

**TIME:** 0915 hours

**PHOTOGRAPHY BY:** A. Lynch

**CAMERA:** HP Photosmart M22

**PHOTOGRAPHY LOG SHEET**  
**Stenton Trust Mill Drum • Sanford, Maine**



**SCENE:** View of the nine transformers, extracted from the transformer pad located east of the on-site building, loaded on the flat-bed trailer for disposal. Photograph taken facing south.

**DATE:** 30 September 2008

**TIME:** 1046 hours

**PHOTOGRAPHY BY:** A. Lynch

**CAMERA:** HP Photosmart M22

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