

**United States Environmental Protection Agency**  
**Region I**  
**POLLUTION REPORT**

**Date:** Thursday, May 30, 2019

**From:** Catherine Young

**Subject:** Initial Polrep for Removal Action #2

Stenton Trust Mill Site  
13 River Street, Sanford, ME  
Latitude: 43.4419000  
Longitude: -70.7733000

|                          |                   |                            |                |
|--------------------------|-------------------|----------------------------|----------------|
| <b>POLREP No.:</b>       | 3                 | <b>Site #:</b>             | 01FA           |
| <b>Reporting Period:</b> | 5/23/19 - 5/30/19 | <b>D.O. #:</b>             |                |
| <b>Start Date:</b>       | 5/23/2019         | <b>Response Authority:</b> | CERCLA         |
| <b>Mob Date:</b>         | 5/23/2019         | <b>Response Type:</b>      | Time-Critical  |
| <b>Demob Date:</b>       |                   | <b>NPL Status:</b>         | Non NPL        |
| <b>Completion Date:</b>  |                   | <b>Incident Category:</b>  | Removal Action |
| <b>CERCLIS ID #:</b>     | MEN000105887      | <b>Contract #</b>          |                |
| <b>RCRIS ID #:</b>       |                   |                            |                |

**Site Description**

This is the second removal action at the Stenton Trust Mills Site. A removal action was conducted in 2008 to remove drums and containers of hazardous materials. Refer to PolRep #1 and PolRep #2 for details of information on the removal action conducted in 2008.

The Site is a former textile manufacturing facility built in the 1920's. The 6.8-acre site is zoned by the City of Sanford, ME Planning & Community Development Department for Industrial Reuse (IR). There are two buildings that encompass approximately 270,000 square feet and cover approximately 75% of the property. The largest building consists of six distinct areas, which includes 5 attached sections overlain to a single basement area. The areas are identified as follows and on the attached map:

- Tower A (West Tower) - Five-story section of the building closest to River Street on the west side of the Site;
- Section B - One-story building which connects Towers A and C;
- Tower C (East Tower) - Five-story section of the building located on the east side of the Site and connected to Sections B and D;
- Section D - One-story section of the building connected to Tower C;
- Loading dock - One-story section located along the north end of building; and
- Building basement that underlies all sections of the building, excluding the loading dock (not identified on the attached map).

The second building is a detached structure utilized as a garage, which is not part of this removal action.

On 23 June 2017, a five-alarm fire was reported in the rear section of the largest building (Tower C and Sections B and D). The fire caused significant structural damage to Tower C and Section D and moderate damage to Section B. No fire damage occurred at the garage building. At the request of the Maine Department of Environmental Protection (ME DEP) and the City of Sanford, EPA agreed to conduct a site investigation to evaluate potential threats to the public and/or the environment from hazardous materials released from the Site. The City of Sanford erected a fence around the buildings to control access but trespassing continues to be an issue.

On 13 September 2017, EPA, accompanied by Region 1 Superfund Technical Assessment and Response Team (START), mobilized to the Site to conduct a Preliminary Assessment/Site Investigation (PA/SI). EPA collected 5-point composite surface-soil samples from twelve locations downgradient of the buildings on the day of the fire to determine if asbestos fibers migrated off-site during the fire. Three of the twelve locations contained trace levels (<1%) of asbestos fibers. EPA also collected bulk samples from materials that appear to be from the Tower C roof. One of the samples contained chrysotile asbestos. In addition to these samples, EPA collected three grab samples from the soil surrounding the former pump house along the east side of the Site and adjacent to the parking area for the York County Community Action

Corporation (YCCAC), to determine if any hazardous substances may have migrated off-site from Tower C during the June 2017 fire due to runoff of fire suppression water. The exposed soil area surrounding the former pump house is approximately 600 square feet and surrounded by an asphalt YCCAC parking area. The three soil samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), metals, cyanide, and asbestos. Elevated levels of lead, arsenic and benzo(a)pyrene were detected above the EPA Removal Management Levels (RMLs) and ME DEP Remedial Action Guides (RAGs).

Due to the condition of the building as a result of the fire, EPA was unable to collect samples from the debris located inside the building to confirm the presence of asbestos. However, EPA was able to collect bulk samples outside of the building from material that appeared to be from the roof. Results of the analysis of these samples determined the presence of chrysotile asbestos. Following mobilization of personnel and equipment to conduct removal activities, additional debris samples will be collected inside Towers A and C, as well as Section B, to more fully characterize the Site.

Due to the inaccessibility of the building during the PA/SI which prevented EPA from collecting samples from within it, sampling information included in investigative reports conducted prior to the June 2017 fire were referenced to determine concentrations of asbestos located within the building. In 2007, a Phase I Environmental Site Assessment (ESA) was conducted by Credere Associates, LLC. (CA) for the Southern Maine Regional Planning Commission (SMRPC), which documented the likely presence of asbestos building materials in the building. Based on the 2007 ESA, an Environmental Safety and Hygiene Association (ESHA), Inc. report was initiated in 2008 to confirm the presence of ACM in the building. The report was prepared for CA under an SMRPC Brownfields Grant. The results from the 2008 ESHA Report document the presence of asbestos in linoleum, mud fittings, insulation, window glazing and plaster wall throughout the larger building.

As a result of the findings documented in the Phase I ESA and the ESHA reports, a Phase II ESA was conducted in 2008 by CA for the SMRPC. The Phase II ESA included the collection of bulk samples from materials located throughout the larger building located at the Site, which detected asbestos in concentrations ranging from 0.25% to 30% for chrysotile and amosite.

### **Current Activities**

The current activities at the Site:

- Hire a structural engineer to develop building dismantling plan for Tower C and Section B and D.
- Set up site support equipment (site trailer, bathrooms, administrative equipment)
- Install water line to provide water to the site for decontamination and dust suppression activities.
- Hire an electrician to install power panels and work with Central Maine Power to connect electrical lines to provide power to the site.
- Conduct site walks with asbestos contractors and demolitions contractors for solicitations of bids.
- Install a temporary road to provide continuous access to the adjacent Central Furniture business while Stenton Trust Drive is closed during demolition activities.
- Coordinate with the State Historic Preservation Officer (SHPO) for development of a Memorandum of Agreement (MOA) regarding the demolition of Section B.
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### **Planned Removal Actions**

The planned removal actions at the Site:

- Complete installation of the temporary road.
- Conduct asbestos removal in Tower A.
- Undertake demolition of Tower C and Sections B and D.
- Conduct air sampling for particulates and asbestos, as needed.
- Remove and dispose of soils contaminated with hazardous materials.
- Sampling of soil to determine absence of asbestos prior to completion of removal activities.
- Remove temporary road.
- In coordination with the Town of Sanford, restore the Site to pre-removal condition, as is possible.

### **Next Steps**

The next steps at the Site:

- Development of an MOA with the SHPO.
- Finalize selection of the demolition contractor.
- Conduct a Site Safety walk thorough Tower A and install safety measures, as needed, in preparation for

the start of asbestos removal activities.

### Key Issues

Key issues include:

- The Site is located next to the YCCAC, which is a community service center.

### Estimated Costs \*

|                           | Budgeted              | Total To Date      | Remaining             | % Remaining   |
|---------------------------|-----------------------|--------------------|-----------------------|---------------|
| <b>Extramural Costs</b>   |                       |                    |                       |               |
| ERRS - Cleanup Contractor | \$1,300,000.00        | \$14,970.61        | \$1,285,029.39        | 98.85%        |
| RST/START                 | \$250,000.00          | \$0.00             | \$250,000.00          | 100.00%       |
| <b>Intramural Costs</b>   |                       |                    |                       |               |
|                           |                       |                    |                       |               |
| <b>Total Site Costs</b>   | <b>\$1,550,000.00</b> | <b>\$14,970.61</b> | <b>\$1,535,029.39</b> | <b>99.03%</b> |

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. 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.

[response.epa.gov/stentontrustmill](https://response.epa.gov/stentontrustmill)

POLREP #3 Last Updated 7/17/2019