

SOCIAL HOUSING TASK FORCE

Wednesday, May 13, 2026 at 6:00 PM
City Hall Basement Room 24 Kippy
Richardson Room



MEMBERS

City Councilor Kate Sykes, Co-Chair
City Councilor Sarah Michniewicz
Paul Styslinger
Bill Stauffer
Jason Spector
Catherine Buxton
Wendy Cherubini
Cullen Ryan
Matthew Peters
Kristin Leffler
Jon Fetherston, Co-Chair
Jonathan Culley
Tim Wells

The Social Housing Task Force will conduct this meeting in person. If you are not able to attend in person, a recording will be available in the [Agenda Center](#) following the meeting.

PUBLIC COMMENT INFORMATION:

To submit written public comment on an agenda item, email socialhousingtaskforce@portlandmaine.gov. Submissions must be received by 12:00 pm the day before the Social Housing Task Force meeting to guarantee their inclusion in the agenda packet. All submissions must include the commenter's name and legal address. To help ensure your comment is submitted for the correct item, please include the name of the agenda item (see below).

AGENDA:

- 1. Review and Approve Minutes from the April 22, 2026 Meeting**
 - i. SHTF Draft Minutes of Meeting 04.22.2026
- 2. Administrative Updates, Announcements, etc., as needed**
- 3. Updates regarding 0 Cornell Street - Mary Davis**
 - i. Staff Memo
 - ii. Real Estate Tax Information
 - iii. 1999 Brownfield Site Assessment Report
 - iv. 2008 Information
 - v. 2015 Phase 1 ESA
 - vi. 2015 Information
 - vii. 2016 Information
- 4. Debrief and Discussion regarding PHA Memorandum from 04.22.2026 Meeting**

i. PHDC Memo to SHTF 04.22.2026

5. Discussion regarding draft Cornell Street pro forma - Jonathan Culley/Matt Peters

6. General Discussion regarding desired / anticipated public outreach.

Social Housing Task Force Minutes of Business Meeting held April 22, 2026 at 6:00 pm.

A recording of the meeting is posted [here](#). These minutes provide a record of those in attendance, the general discussion taking place, and motions made. Please refer to the recording for discussion details.

In attendance:

City Councilor Kate Sykes – Co-Chair
Jon Fetherston – Co-Chair
Bill Stauffer
Wendy Cherubini
Jonathan Culley
Jason Spector
Catherine Buxton
City Councilor Sarah Michniewicz
Paul Styslinger
Cullen Ryan
Tim Wells
Kristin Leffler

Leah Bruns, Executive Director, Portland Housing Authority
Jay Waterman, Director of Real Estate Development, Portland Housing Authority

Mary Davis, Division Director, City's Housing and Community Development Division
Christian Roadman, GPCOG, Senior Planner

The meeting started at approximately 6:06 PM. It opened with approval of the minutes from April 8, 2026 (moved by Cullen Ryan, seconded by Chair Fetherston, with unanimous approval).

Christian Roadman provided administrative updates, noting that he continues to accept W9s from anyone interested in receiving a stipend for their participation.

The group held a round of introductions.

Jay Waterman presented a memo he prepared discussing Portland Housing Authority's (PHA) understanding of the task force's goals and two potential projects a City social housing effort could potentially invest in and collaborate on. First, he outlined an infill Congress Street project that PHA intends to submit to the City, for 54 one-bedroom units in a seven-story building (PHA has an option on the property, which is near Maine Medical Center). While PHA originally intended to use Low-Income Housing Tax Credits (LIHTC) as part of the project, he noted that for this exercise they were excluded from the hypothetical project pro forma given the task force's interests in partnering on a project and avoiding reliance on / competition for LIHTC resources.

Questions, answers, and relevant discussion ensued regarding the project, as well as the assumptions Mr. Waterman used. These included assumed area median income (AMI) targets, project size and unit mix, as well as the potential for use of a condominium structure to keep a LIHTC and a social housing initiative as separate entities within the same broader project. Relevant discussion followed.

Jay Waterman briefly introduced a concept regarding the City's 21 Randall Street property, which is a much smaller lot and PHA is considering for a homeownership project. Brief commentary from the task force followed to the effect that homeownership is interesting and potentially fits within the social housing mission but probably isn't the right approach for a first project. PHA discussed its financing and project assumptions, including that the City might donate the land.

However, because the project as currently imagined is geared towards homeownership instead of rental, it did not merit much discussion at present.

The task force briefly discussed the potential for the City to change zoning, but how such an approach could be seen as a special exception or foster political peril for important efforts.

Jay Waterman and Leah Bruns discussed other, City and PHA-owned properties that could yield potential additional density or new projects. They acknowledged that opportunities in East Bayside may align well with the timeline of a Portland social housing effort.

Discussion followed regarding City-owned properties the task force discussed at its April meeting, including 0 Cornell Street (a brownfield site with zoning that could yield approximately 40-50 units). The task force expressed interest in PHA running financing models regarding that project, to see if a collaboration might be fruitful. Mary Davis acknowledged that more information regarding that property is forthcoming.

Chair Sykes acknowledged that right now the task force is approaching housing from a scarcity mindset, but the goal is to create a compounding resource that is constantly creating more housing— instead of trying to fix one shortfall or gap. Cullen Ryan acknowledged that with one sizeable bond, the City could facilitate a good project – then propose a bond that is several times larger to do more. Jason Spector agreed that an important proof of concept will be the actual construction of a building. Discussion followed regarding potential approaches and strategies to moving forward, renewing investment, and gaining support.

Jonathan Culley asked PHA staff what they would need from the City to act as a developer on their behalf on a City-owned site. Jay Waterman responded that a memorandum of understanding might be appropriate, and that initial understanding of geotechnical, environmental, and zoning issues would need to occur; if the City could do some due diligence upfront (i.e., a phase 1 and, if necessary, a phase 2 environmental assessment, or a geotechnical assessment) before PHA came onboard that would allow PHA to avoid assuming financial risk. He also acknowledged the importance of understanding the City's demands and what it is willing to provide.

Mary Davis noted that the concept of social housing isn't necessarily a barrier, but the creation of a new financing model is a challenge. Jay Waterman confirmed that if PHA isn't pursuing a LIHTC deal, they'll need to understand how they're expected to work; the City will need to understand and clarify what it can bring to the table, like bonding.

Discussion continued regarding deliverables and goals for the task force. Jonathan Culley stated that he would like to identify a project that the task force is recommending to the City Council as a viable option. Paul Styslinger said that he would like to have the task force present two options: a City-owned parcel model and a density-maximization partnership with PHA, identifying the potential costs for both.

The group briefly discussed whether any PHA governance shift – particularly regarding the Board of Directors - would be required or advisable if a partnership between that organization and the City is to come to fruition. Participants acknowledged that this could involve significant process and potentially unnecessary complication.

The task force confirmed that the next meeting is scheduled for May 13, and that Mary Davis will be seeking out more information regarding the 0 Cornell Street property in the interim.

The meeting adjourned at approximately 7:59 pm (moved by Chair Fetherston, seconded by Tim Wells, with unanimous approval).

**City of Portland | Housing and Economic Development
Department**

Mary Davis, Division Director
Housing and Community Development



To: Social Housing Task Force
Meeting Date: May 13, 2026

AGENDA ITEM: Agenda Item 3. Updates Regarding 0 Cornell Street

BACKGROUND/ANALYSIS: For over two decades, Cornell Street has seen various development proposals. A 2005 Purchase and Sale Agreement involving the city included an escrow component where the buyer deposited \$355,000. Because the buyer failed to submit required permit applications by the designated deadline, the city's legal team is currently moving to void the escrow agreement. Successfully voiding this agreement will grant the city access to these funds, which can then be allocated toward further environmental assessments or remediation expenses.

The site's industrial history dates back to 1895 with a billiard ball manufacturer that later produced clay casino chips. After being used by an asbestos abatement company in the late 1980s, the property was abandoned following the first of several building fires in October 1989.

Environmental concerns were highlighted in a 2015 Phase I Assessment, which identified high levels of arsenic and lead. Remediation estimates at that time varied between \$3 million and \$9 million for out-of-state soil disposal, depending on soil treatment. Alternatively, onsite storage of treated, non-hazardous soil was estimated at \$2 million. To determine next steps, the city has asked its Brownfield Grant consultant to estimate the cost of reviewing our existing records and determining next steps, including the cost to complete Phase I and Phase II Environmental Site Assessments.

ATTACHMENTS

0 Cornell Tax Card / 0 Cornell Tax Map
Brownfield Site Assessment Report by MDEP of 2-24-1999
1-25-2008 Letter to MDEP from St. Germain & Assoc.
1-25-2008 Site Investigation Report from St. Germain & Assoc.
4-4-2008 MDEP NAA Letter to Morrills Crossing - 0 Cornell St.
15056 Burt Company ESA Phase 1 - Final 7-20-2015
15426. VRAP App Covletter of 12-11-2015 w App.
15426B-151217 Survey by STO 11-2015
12-28-2015 Letter from MDEP acknowledging receipt of VRAP Application
1-15-2016 DEP Field Determination Form Report
1-15-2016 Letter from STI to MDEP with RAP for Cambridge and Cornell Sts.
Enc to STI Letter to MDEP VRAP 1-2016

Printable page

PARID: 151A A013001
CITY OF PORTLAND

0 CORNELL ST

Parcel

Parcel ID 151A A013001
 Property Location 0 CORNELL ST
 Unit
 Living Unit
 Land Use Code 56 - GOVERNMENTAL
 Verify legal use with the Zoning Office
 Land Area (acreage) 3.1044
 Notes 151A-A-13
 R MORRILL ST
 135227 SF
 Utilities 1 - ALL PUBLIC
 -
 -

Owners

Owner CITY OF PORTLAND
 Address 389 CONGRESS ST
 City, State, Zip PORTLAND ME 04101
 Deed Date 04/01/2003
 Book NCFY03
 Page

Assessed Values

Land \$871,400
 Building \$0
 Total \$871,400
 Homestead / Veterans Exemption \$0
 Other Exemptions \$871,400
Taxable Value \$0

Sales History

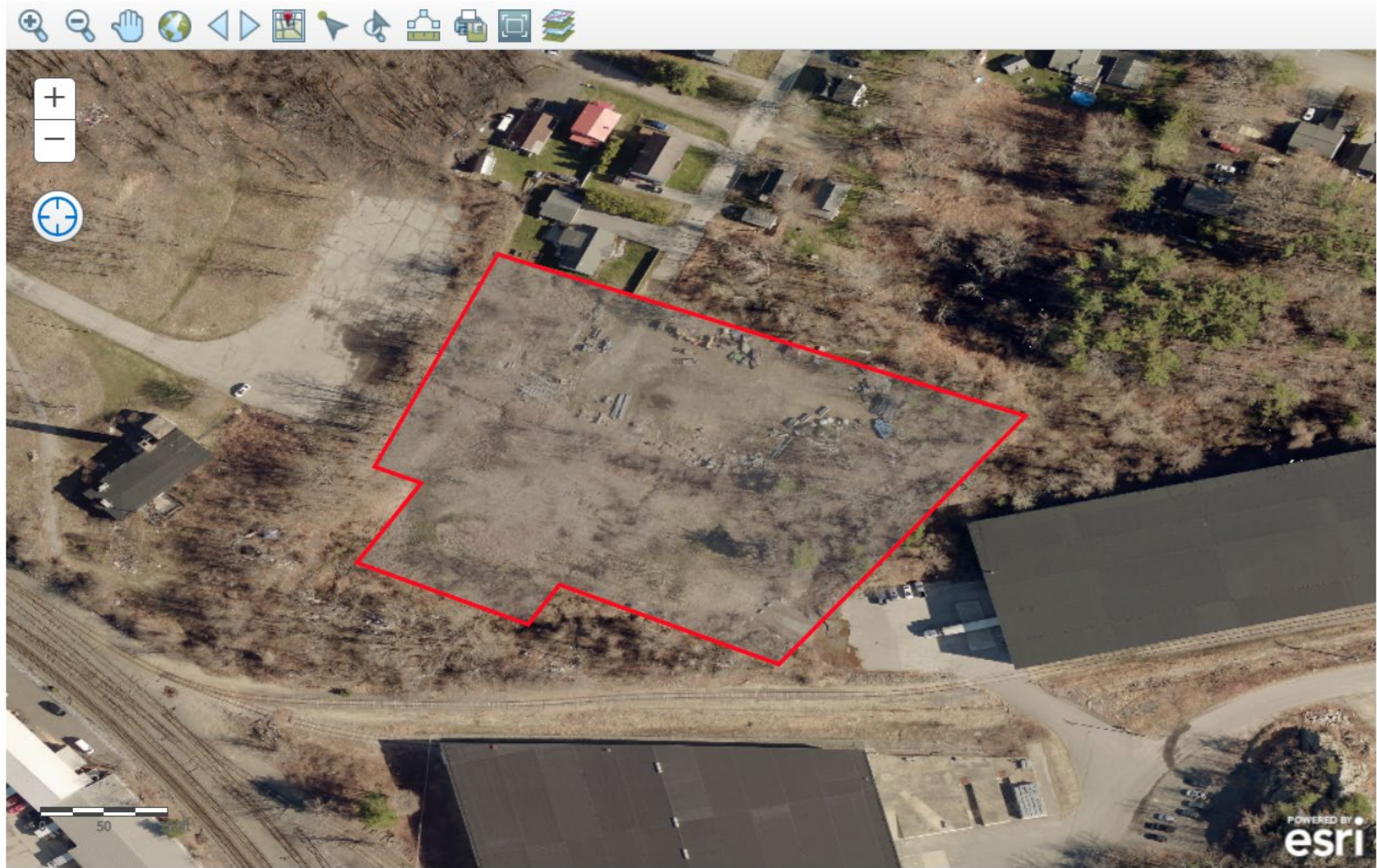
Date	Price	Grantee	Grantor	Book	Page
04/01/2003	\$0	CITY OF PORTLAND	REEF NORMAN & RAYMOND H REEF TRUSTEES	NCFY03	
05/06/1988	\$0	REEF NORMAN S & RAYMOND H REEF TRUSTEES		8279	185
07/15/1985	\$0	REEF, NORMAN		6826	263

Assessment History

Year	Land	Building	Total	Standard Exemption	Other Exemption	Taxable Value
2025	\$871,400	\$0	\$871,400	\$0	\$871,400	\$0
2024	\$661,000	\$0	\$661,000	\$0	\$661,000	\$0
2023	\$661,000	\$0	\$661,000	\$0	\$661,000	\$0
2022	\$661,000	\$0	\$661,000	\$0	\$661,000	\$0
2021	\$661,000	\$0	\$661,000	\$0	\$661,000	\$0
2020	\$377,600	\$0	\$377,600	\$0	\$377,600	\$0
2019	\$377,600	\$0	\$377,600	\$0	\$377,600	\$0
2018	\$377,600	\$0	\$377,600	\$0	\$377,600	\$0
2017	\$377,600	\$0	\$377,600	\$0	\$377,600	\$0
2016	\$377,600	\$0	\$377,600	\$0	\$377,600	\$0

0 Cornell

PARID: 151A A013001
CITY OF PORTLAND



BROWNFIELDS SITE ASSESSMENT REPORT

BURT COMPANY – PORTLAND, MAINE

February 24, 1999

Prepared by:

Brian Beneski

Maine Department of Environmental Protection

**Brownfield Site Assessment
Burt Company- 1 Cambridge Street, Portland Maine**

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**Brownfield Site Assessment
Burt Company- 1 Cambridge Street, Portland Maine**

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1.0 INTRODUCTION

The Maine Department of Environmental Protection (MEDEP) has prepared this Brownfields Site Assessment Report (BSA) regarding the Burt Company Site in Portland, Maine for the United States Environmental Protection Agency (USEPA). The purpose of this report was to collect information concerning conditions at the Site, to assess the potential threat to human health and the environment, and to characterize the sources of contamination present at the Site.

2.0 SITE DESCRIPTION

2.1 Site Location

The Burt Company Site (the Site) is located at 1 Cambridge Street in Portland, Cumberland County, Maine at latitude 43° 41' 19" and longitude 70° 17' 20" (Figure 1). The Site is approximately 3.1 acres in size, and is listed on the Portland Tax Assessor's map 151-A, lot 13 (1).

2.2 Site Description

The site is located on the boundary of a residential/industrial area of the City of Portland (see Figure 2). The site is bordered to the northeast by residential housing, to the southeast by a warehouse, to the southwest by railroad tracks, and to the northwest by a large paved parking lot. The only vehicle access to the property is from the northeast via Cambridge Street, a residential street. A fence exists on the northwest side of the property and partially along the northeast side, and includes a gate across the access from Cambridge Street. The area surrounding the site is served by municipal water and sewer; the closest drinking water well to the site is located approximately five miles southwest of the Site in the town of Scarborough (1).

The site is covered by vegetation, mostly grass and weeds, with a few trees scattered throughout the site, particularly on the southern corner of the site. Three buildings are located on the property and were utilized by Burt Company; two buildings utilized for manufacturing, one as an office and the other as a garage (Figure 3). However, excessive vandalism and fires to these structures since the time the Site was left vacant have rendered them unusable. A small stream bisects the Site, entering from a culvert on the northeast, flowing underneath a portion of one of the manufacturing buildings, and into Milliken Brook, which flows along the southern boundary, and exits the eastern corner of the Site.

2.3 Site Activity/History

2.3.1 Manufacturing History

Available information regarding the site indicates that Portland Billiard Ball Corporation began operating at the Site in 1895 manufacturing billiard balls. Sometime after this date, the company changed its name to the Burt Company and added the manufacture of clay casino gaming chips to its operation. The company utilized compression molding manufacturing and injection molding processes for both gaming chips and billiard balls (1).

In 1984, the Burt Company was sold to Arthur Girard who continued to operate under the Burt Company name. In 1985 The Brothers Corporation purchased the property. The Brothers Corporation continued operations under the Burt Company name until 1988 when the company was reorganized as CHIPCO International, Inc. Also in 1988, the company began using a manufacturing process utilizing offsite injection molding and printing of the product. With a shift to offsite manufacturing, most of the manufacturing equipment, inventory and materials were consequently sold to Atlantic Molding, Inc. (1).

In May of 1988, R.F. Investment Trust purchased the site, and subsequently leased the property in 1989 to Bekor Industries, Inc., an asbestos abatement firm. In October of 1989 the first of numerous fires damaged several of the buildings on site. After this fire Bekor Industries vacated the Site; the property has been idle ever since (1).

2.3.2 Regulatory History

In March of 1990 the Portland Fire Department, while responding to a fire reportedly set by vandals, observed and reported to the MEDEP various chemicals and powders were unsecured and were released into the environment. The MEDEP subsequently sent notifications to the current property owner which requested that the property be secured and the hazardous substances be stabilized and properly disposed of. Although Mr. Reef partially fenced the property, he did not indicate a willingness to properly address the hazardous substances at the site (1).

In May of 1990, the MEDEP contracted with LRS Environ-Services, Inc. to secure and stage the hazardous wastes at the Site. LRS performed the site work from May 23, 1990 to June 7, 1990, stockpiling approximately 45 cubic yards of contaminated soil and 180 overpacked drums of waste material. The wastes were temporarily staged on site until MEDEP could make final disposal arrangements. In December 1990, MEDEP completed a Preliminary Assessment report of the Site; this report recommended that a Screening Site Inspection be performed at the Site. In April of 1991, the MEDEP formally designated the Site as an Uncontrolled Hazardous Substance Site (1).

In November of 1991, the Portland Water District obtained samples from Milliken brook in an attempt to locate a source of elevated cadmium levels at the Portland Wastewater Treatment Plant. Only low levels of cadmium were detected, and the district concluded that the Site was not the source of the cadmium at the treatment plant (1).

Additional work was conducted by LRS in April of 1991 to: inventory the drummed waste staged on site; collect samples for disposal considerations; and pack the material in a more secure manner. In May of 1992 LRS utilized the following contractors for disposal of the material on Site: Michigan Disposal, Inc. for the disposal of stockpiled soil and overpacked wastes; Jet-Line Services, Inc. for the disposal of 3,500 gallons of No.2 and No. 6 heating fuel; General Chemical, Inc for the disposal of various flammable oil and water mixtures; and Frontier Chemical Waste Process, Inc. for the disposal of alkaline and ethyl alcohol waste solutions (1).

In November of 1992, Roy F. Weston, Inc. (RFW), completed a Final Site Inspection Report on the Site for the USEPA. Fieldwork conducted for this report included the collection and analysis of soil samples at the Site. Although the report itself made no conclusions, USEPA recommended additional work under CERCLA, using the results of the soil sampling as the basis of their conclusion (2).

Since the final removal of the stockpiled material in the May of 1992 and the field work for the RFW report in April of 1992, no additional investigative or remedial work has been conducted at the Site, with the exception of the field work conducted in June of 1998 for this report.

As of November of 1998, the City of Portland has began abatement work of the asbestos in the buildings on site. The City anticipates demolishing the buildings on site in the later part of 1998 (3).

2.4 Potential Sources of Contamination

The raw materials formerly used on-site by the Portland Billiard Corporation, Burt Company, and Brothers Corporation include many hazardous and nonhazardous substances as defined under Title 40, part 261 of the code of Federal Regulations. Pigments and filler materials containing lead, antimony, cobalt, zinc, nickel, chromium, cadmium, and barium compounds were commonly used in past manufacturing operations at the site. Other materials possibly used onsite include TEK-SOL, a solvent composed mainly of aromatic hydrocarbons (1).

No information is available about waste disposal practices during manufacturing at the Site. Therefore, MEDEP conducted the fieldwork using field conditions such as "staining" and "filled areas" as possible source areas.

Current conditions at the site indicate that two areas may have been utilized for waste disposal from the manufacturing process. These areas are on the eastern portion of the Site and are separated from each other by the stream bisecting the site. Both of these

areas exhibit the characteristics of being "filled". It is also possible that waste material may have also been discharged into the stream as it runs underneath the main manufacturing facility. The possibility also exists that waste has been haphazardly discharged around the back areas of the manufacturing buildings.

3.0 SOURCE ASSESSMENT

3.1 Previous Sampling

Sampling was first conducted at the Site by MEDEP in March of 1990. Sample of spilled bags of lead monosilicate and dye were collected and analyzed for total metals and EP TOX metals. To determine the impact of the spilled material, representatives from MEDEP returned to the Site in May of 1990 to collect samples from soil in front of and underneath the floorboards in the garage for volatile organic compounds (VOCs) and EPTOX metals. After conducting a soil removal in this area, MEDEP returned in September 1990 to collect post excavation samples after a soil removal in this same area. From the post excavation results it appears that the removal action was successful (1).

RFW conducted a sampling event for a USEPA contracted Site Investigation in June 1990. This sampling event concentrated on surficial soil (six samples) and sediment samples (six samples) of the unnamed stream and Milliken Brook (Figure 3). A summary of the compounds detected during the RFW sampling can be found on Table 1 along with the MEDEP "Remedial Action Guideline for contaminated soil (RAG)" residential level for that respective compound. Compounds listed on Table 1 are those that were detected at levels three times greater than reference concentration (i.e., background samples, sample detection limit, or sample quantitation limit).

Arsenic and Lead were the only compounds detected at levels above the MEDEP's Remedial Action Guidelines for Contaminated Soil. Arsenic exceeded the 10 mg/kg residential standard at locations SS-03 (31.8 mg/kg), SS-04 (33.6 mg/kg), and SD-11 (10.8 mg/kg). Lead exceeded the 375 mg/kg residential guideline at locations SS-03 (2,230 mg/kg), and SS-04 (1,600 mg/kg). SS-04 was a duplicate sample taken of SS-03 for quality control purposes.

Since previous sampling on surficial soil and sediment had been done, sampling for the BSA concentrated on groundwater and subsurface soil in an effort to determine if any "source areas" of hazardous substances exist.

3.2 BSA Assessment Methodology/Field Schedule

On July 1 and July 2, 1998 representatives of the MEDEP visited the Site for the purpose of conducting the fieldwork for this BSA. A Concord Environmental "Little White Wagon" hydraulic direct push hammer was utilized in conjunction with a Geoprobe® soil boring system. A 1 inch outside diameter PVC microwell was installed in each soil boring to allow collection of overburden groundwater. Groundwater samples were also obtained using Geoprobe®'s mill slotted well point system.

Table 1
Summary of compounds Detected during RFW Sampling

Compound	Sample locations detected	Highest Level	RAG
Arsenic	SS-03; SS-04; SD-07,SD-11	33.6 mg/kg	10 mg/kg
Aluminum	SD-11	30,800 mg/kg	-
Barium	SS-03; SS-04	6,900 mg/kg	10,000 mg/kg
Copper	SS-03; SS-04	539 mg/kg	650 mg/kg
Cobalt	SD-11	20.5 mg/kg	-
Chromium	SD-11	64.4 mg/kg	960 mg/kg
Iron	SD-11	43,900 mg/kg	-
Lead	SS-03; SS-04	2,230 mg/kg	375 mg/kg
Mercury	SS-01; SS-03; SS-04	1.4 mg/kg	60 mg/kg
Sodium	SS-03; SS-04	441 mg/kg	-
Magnesium	SD-11	11,300 mg/kg	-
Manganese	SD-11	608 mg/kg	-
Potassium	SD-11	9,910 mg/kg	-
Thallium	SD-11	0.42 mg/kg	-
Vanadium	SS-03; SS-04; SD-11	442 mg/kg	-
Zinc	SS-03; SS-04;	680 mg/kg	1,500 mg/kg
Fluoranthene	SS-02; SS-03; SS-04;	0.390 mg/kg	-
Pyrene	SS-02; SS-03; SS-04	0.200 mg/kg	-
Aroclor 1260	SD-07	0.350 mg/kg	2.2 mg/kg

RAG – Remedial action guideline
 - no RAG available

3.2.1 Soil Boring Methodology

Locations of the soil borings can be seen in Figure 4. Please refer to Appendix A for soil boring logs. The Large Bore Sampling probe was utilized at four locations (GP – 1 through GP - 4). At two other locations, a Geoprobe® Systems Mill – Slotted Well Point with a Geoprobe® Systems manual hammer was utilized to create the borehole for microwell installation. Soil samples from the Borings were field screened with a photo ionization detector (PID) following the standard MEDEP protocol as outlined in the “Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Groundwater in Maine”.

3.2.2 Microwell Installation/Sampling Methodology

After reaching the end point of the boring, a 1 inch PVC well with a 10 slot screen was then inserted into the soil boring hole immediately after the withdrawal of the

Geoprobe® unit. Filter sand was then placed around the PVC well to fill the annulus around the screen. A bentonite seal was placed at the top of the annulus to prevent direct surface water infiltration.

After installation of the microwell, ¼ inch polyethylene tubing was inserted into each well, and a peristaltic pump was then used to draw a sample of the groundwater from the well. Since the overburden of the Site consisted of a relatively tight formation, the initial purge rates were set at the lowest possible flow, and the appropriate sample containers were filled after one tubing volume was purged to assure the collection of the groundwater samples from the well. Field personnel then attempted to develop the microwell at a constant flow rate while maintaining a constant water level. If further development was possible, additional samples were collected. If a second sample with lower silt content was collected, the initial samples were discarded. If the well did not recharge adequately to allow further development, field personnel allowed the well to recharge for several hours before attempting to collect additional samples.

3.3 Sampling Locations

Samples were collected from six locations on site. The sampling locations can be seen of Figure 3, the rationale for the locations are described below.

GP-1: An area of the site with the appearance of being a fill/waste disposal area.

GP-2: An area of the site with the appearance of being a fill/waste disposal area.

GP-3: An area of stained soil. Located “behind” back maintenance building, a likely area for “lazy employee waste disposal”.

GP-4: Located downgradient of the main manufacturing facility, in area most likely to be impacted if material was discharged in the stream as it flows under the main building.

SS-1: Located in the stained soil area downgradient of the back manufacturing building.

SS-2: Located between manufacturing buildings in an area with nearby fuel oil tanks.

3.4 Analytical Parameters

Table 2 presents the media and sample analysis for each location. An attempt was made at each location to obtain groundwater samples for the following parameters: volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and the following metals: lead; antimony; cobalt; zinc; nickel; chromium; cadmium; barium, copper, mercury; arsenic; selenium; and silver. At locations where groundwater recharge did not allow collection of the full parameter list, a decision was made using field conditions for that specific location for the priority of analysis. At some locations where groundwater was unavailable for sampling, soil samples were analyzed instead.

TABLE 2
Sample Parameter/Media for Brownfield Site Inspection

Sample location	Media	analytical parameters
GP-1	groundwater	volatile organic compounds
	soil (6' – 8')	metals
GP-2	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
	soil (2' – 4')	volatile organic compounds
	soil (4' – 6')	semivolatile organic compounds
GP-3	soil (4' – 6')	metals
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
	soil (2' – 4')	metals
GP-4	soil (6' – 8')	semivolatile organic compounds
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
	soil	semivolatile organic compounds
SS-1	soil	metals
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
SS-2	groundwater	metals
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds

4.0 ANALYTICAL RESULTS

A summary of the analytical results can be seen on Table 3 & 4, laboratory data sheets in Appendix B. In the text of this report, the number in parentheses is either the maximum exposure guidelines for that compound (for a water sample) or RAGs (for a soil sample).

4.1 GP-1

GP-1 is located in the northeast fill area. Field PID readings for all borings were less than 10 ppm. Methyl t-butyl ether (MTBE) was detected in the VOC analysis at 1.12 µg/L (36 µg/L). The following metals were detected: Lead at 47 mg/kg (375 mg/kg), cobalt at 14 mg/kg, zinc at 180 mg/kg (1,500 mg/kg), nickel at 57 mg/kg (3,800 mg/kg), chromium at 68 mg/kg (950 mg/kg), barium at 210 mg/kg, copper at 36 mg/kg (650 mg/kg), arsenic at 26 mg/kg (10 mg/kg), and mercury at 0.16 mg/kg (60 mg/kg).

TABLE 3
Summary of Analysis - Soil

Compound	GP-1	GP-2	GP-3	GP-4	RAG
Lead	47	830	4.2	7.0	375
Zinc	180	3,600	25	21	1,500
Copper	36	73	8	6.2	650
Arsenic	26	220	ND	4	10
Cadmium	ND	47	ND	ND	27
Barium	210	230	33	12	10,000
Cobalt	ND	4.3	ND	ND	-
Nickel	57	17	9.4	5.0	3,800
Chromium	68	170	17	9.4	950
Selenium	ND	13	ND	ND	950
Dichloromethane	NS	0.810	ND	ND	-
Diethyl phthalate	NS	10	ND	ND	-
Dibutyl phthalate	NS	120	ND	ND	-
Di phthalate	NS	14	ND	ND	-
Di n octyl phthlate	NS	2.6	ND	0.26	-
Phenol	NS	ND	ND	0.1	-
2-methol phenol	NS	ND	ND	0.19	-

Concentrations in milligrams per kilogram

RAG – MEDEP Remedial action Guidelines; - no RAG for compound

NS – compound not sampled for at that location

ND – compound not detected at that location

Table 4
Summary of Analysis – Groundwater

METAL	GP-2	GP-3	GP-4	SS-1	MEG
Lead	0.057	ND	ND	0.004	0.05
Cobalt	0.015	ND	ND	0.004	-
Zinc	3.3	0.045	0.06	0.39	-
Nickel	0.020	0.045	ND	0.006	0.15
Chromium	0.004	ND	ND	ND	0.10
Barium	0.70	0.065	0.051	0.22	1.0
Copper	0.011	0.007	ND	0.022	
Arsenic	0.91	0.006	0.005	0.047	0.050
Selenium	0.006	ND	ND	ND	0.010
MTBE	1.12	ND	5.28	3.77	35
DI Phthalate	1.5	ND	2.1	ND	25

Concentrations in miligrams per liter for metals, micrograms per liter for organic vompounds

ND – Compound not detected at that location

MEG – State of Maine maximum exposure guidelines for drinking water

- no MEG for that compound

4.2 GP-2

GP-2 is located in the southeast fill area. The highest PID reading was recorded for the boring at 4' - 6', which had a reading of 11.2 ppm. All other intervals had readings less than 10 ppm. Different colors were observed in the soil of borings 2' - 4' (red), and 4' - 6' (purple, red, and orange), indicating that this area may have been used for the disposal of dye or off spec billiard balls and/or gaming chips.

No volatile organic compounds were detected in the groundwater. Dichloromethane was detected at 0.810 mg/kg and MTBE at <0.005 mg/kg in the soil sample submitted for VOC analysis.

Diethyl phthalate was detected in the groundwater sample submitted for SVOC analysis at 1.5 µg/L. The following compounds were detected in the soil sample submitted for SVOC analysis: Diethyl phthalate at 10 mg/kg; dibutyl phthalate at 120 mg/kg; di (2 ethylhexyl) phthalate at 14 mg/kg; and di n octyl phthalate at 2.6 mg/kg.

Levels of Lead and arsenic in the groundwater from GP-2 exceeded their respective MEGs. Levels of Lead, zinc, and cadmium in the soil borings exceeded its respective RAGs.

4.3 GP-3

GP-3 was located in an area of surface staining behind the back maintenance building. Field PID readings were 10.6 ppm for boring interval 2' - 4', and 14.7 ppm for boring interval 4' - 6'.

No compounds were detected in the groundwater sample submitted for VOC analysis. No soil samples were submitted for VOC analysis.

No compounds were detected in the soil sample or groundwater sample submitted for SVOC analysis.

No MEGs or RAGs were exceeded for any of the compounds that were detected.

4.4 GP-4

GP-4 was located northerly adjacent to the stream that flows beneath the main manufacturing building. The purpose of this sampling location was to determine if waste material was discharged into the stream as it flows beneath the building. The highest field headspace reading at this location was 16.3 ppm in the 4' - 6' boring; all others were below 10 ppm.

MTBE was the only VOC detected in the groundwater sample from this location. The only compound detected in the SVOC groundwater analysis was di (2ethylhexyl)

phthalate at 2.1 µg/L. Di (2ethylhexyl) phthalate was also detected in the soil SVOC sample at 0.26 mg/kg. Additionally, phenol and 2-methol phenol were detected in the soil sample of the SVOC analysis at 0.1 mg/kg and 0.19 mg/kg, respectively.

No MEGs or RAGs were exceeded for any of the compounds detected.

4.5 SS-1

Since SS-1 was a driven point only for the collection of groundwater, no soil samples from this location were obtained. MTBE was the only compound detected in the VOC analysis at 3.77 µg/L. No compounds were detected in the sample submitted for SVOC analysis. The following metals were detected: lead - 0.004 mg/l (0.05 mg/l); cobalt - 0.004mg/l; zinc - 0.39 mg/l; nickel - 0.006 mg/l (0.15 mg/l), barium - 0.22 mg/l (1.0 mg/l), copper - 0.022 mg/l; arsenic - 0.047 mg/l (0.050 mg/l). As can be seen, no concentrations exceeded the MEGs for its respective compound.

4.6 SS-2

Since SS-2 was a driven point only for the collection of groundwater, no soil samples were obtained. No compounds were detected in either the VOC or SVOC sample analysis.

5.0 DISCUSSION

From the visual observations and analytical results, it appears that the only area of the Site was used for waste disposal is in the vicinity of GP-2. Metals appear to be the only contaminants found in any elevated level, most likely from the dyes used in coloring the billiard balls and gaming chips. In addition to colors being observed in the soil samples, the highest soil levels for lead, zinc, chromium, arsenic, and barium were detected in samples from GP-2. However, only lead and arsenic exceed the MEGs in the groundwater sample obtained from the microwell installed in this area.

GP-1 had elevated levels of metals as well, however none of the levels in the soil sample for GP-1 exceeded the RAGs, with the exception of arsenic.

The compounds detected in elevated levels in GP-2 were not detected above reference concentrations in the sediment samples collected downstream from this area (SD-07 and SD-11), indicating that this source area does not appear to be impacting Milliken Brook.

Additionally, sampling conducted by RFW in 1992 indicated the presence of lead and arsenic above Maine's RAGs in the area of sample SS-03 and SS-04.

6.0 CONCLUSIONS

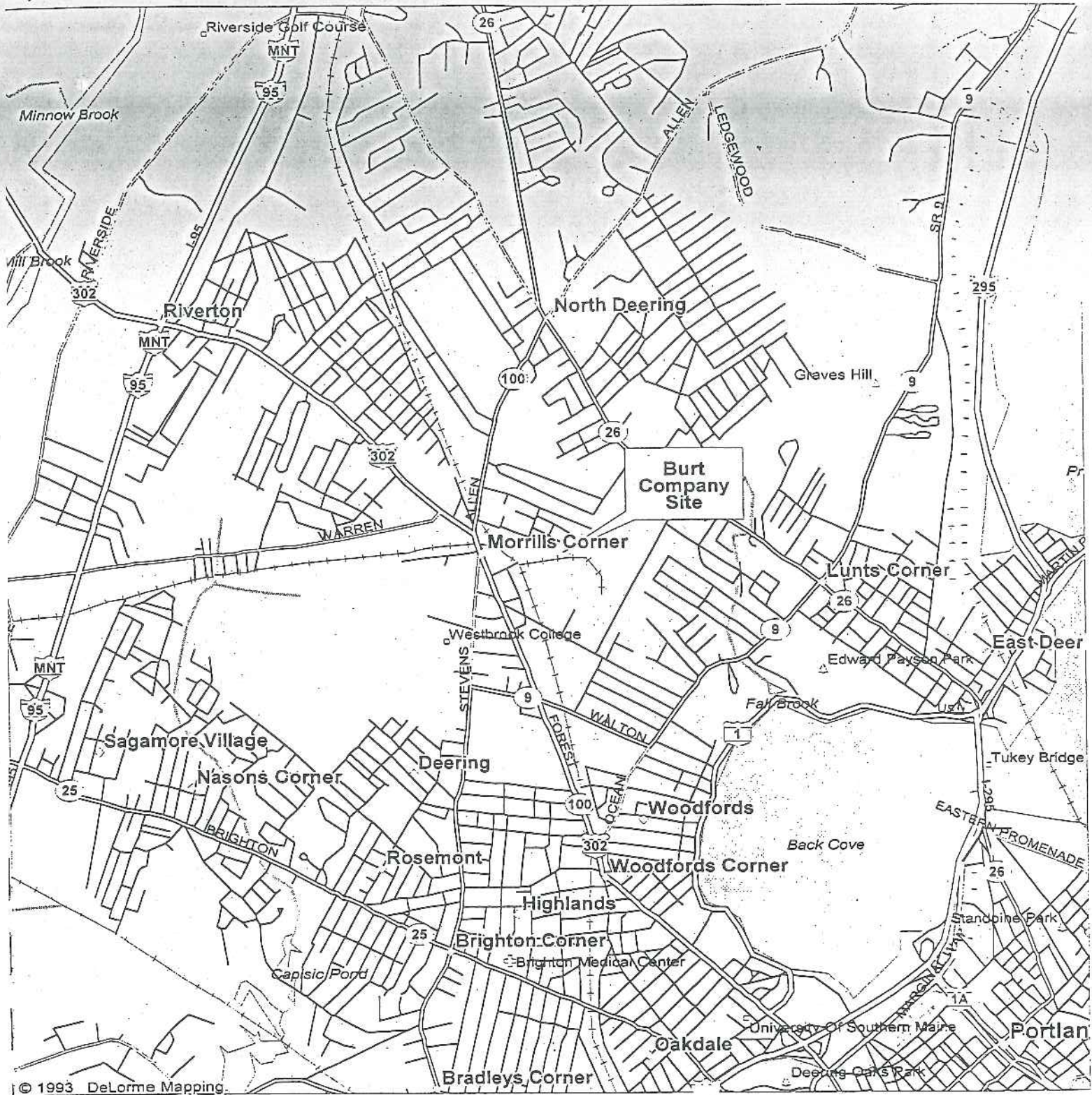
There appears to be two areas of the site impacted above current health guidelines. These two areas consist of the waste disposed of in the area of GP-2, and the area of RFW sample location SS-03 and SS-04.

Since the surrounding area is served by municipal water, the levels of metals in the soil at GP-2 would not warrant removal unless this area was excavated; in that instance the material excavated would have to be characterized and disposed of appropriately. Additionally, some type of cap or cover system should be installed over this area to assure that the contamination is not available to those accessing the site, as well as notification placed on the deed to assure future users of the site to be aware of this particular area. The need for deed restrictions would be unnecessary if a removal of this waste material was conducted.

Additional investigative work should be done in the area of RFW sample location SS-03 and SS-04 to determine the size of the area with lead and arsenic concentrations above the RAGs. Excavation for offsite treatment and disposal or installation of a cap or cover system or cap may be prudent remedial techniques for addressing this area. As with the case with the source area near GP-2, deed restrictions would be required if capping or cover system was chosen as the remedial option; deed restrictions would be unnecessary if the contamination was excavated and disposed of or treated properly off site.

References

1. Roy F. Weston. Final Site Inspection Report - Burt Company, Portland Maine. November 20, 1992.
2. Smith, Nancy. USEPA Region 1. EPA Form #100-3, Remedial Site Assessment Decision for Burt Company, Portland Maine. February 23, 1993.
3. Beneski, Brian. Maine DEP. Telephone Conversation log for Burt Company, Portland Maine. October 30, 1998.



© 1993 DeLorme Mapping.

LEGEND

- | | |
|----------------------|--------------------|
| Population Center | Street, Road |
| State Route | Major Street/Road |
| Geo Feature | State Route |
| Town, Small City | Interstate Highway |
| Hill | US Highway |
| Park | Railroad |
| Interstate, Turnpike | River |
| US Highway | Open Water |

Scale 1:31,250 (at center)

2000 Feet

1000 Meters

Mag 14.00

Wed Nov 04 15:31:15 1998

Figure 1
Site Location
 Brownfield Site Assessment Report
 Burt Company – 1 Cambridge Street
 Portland, Maine

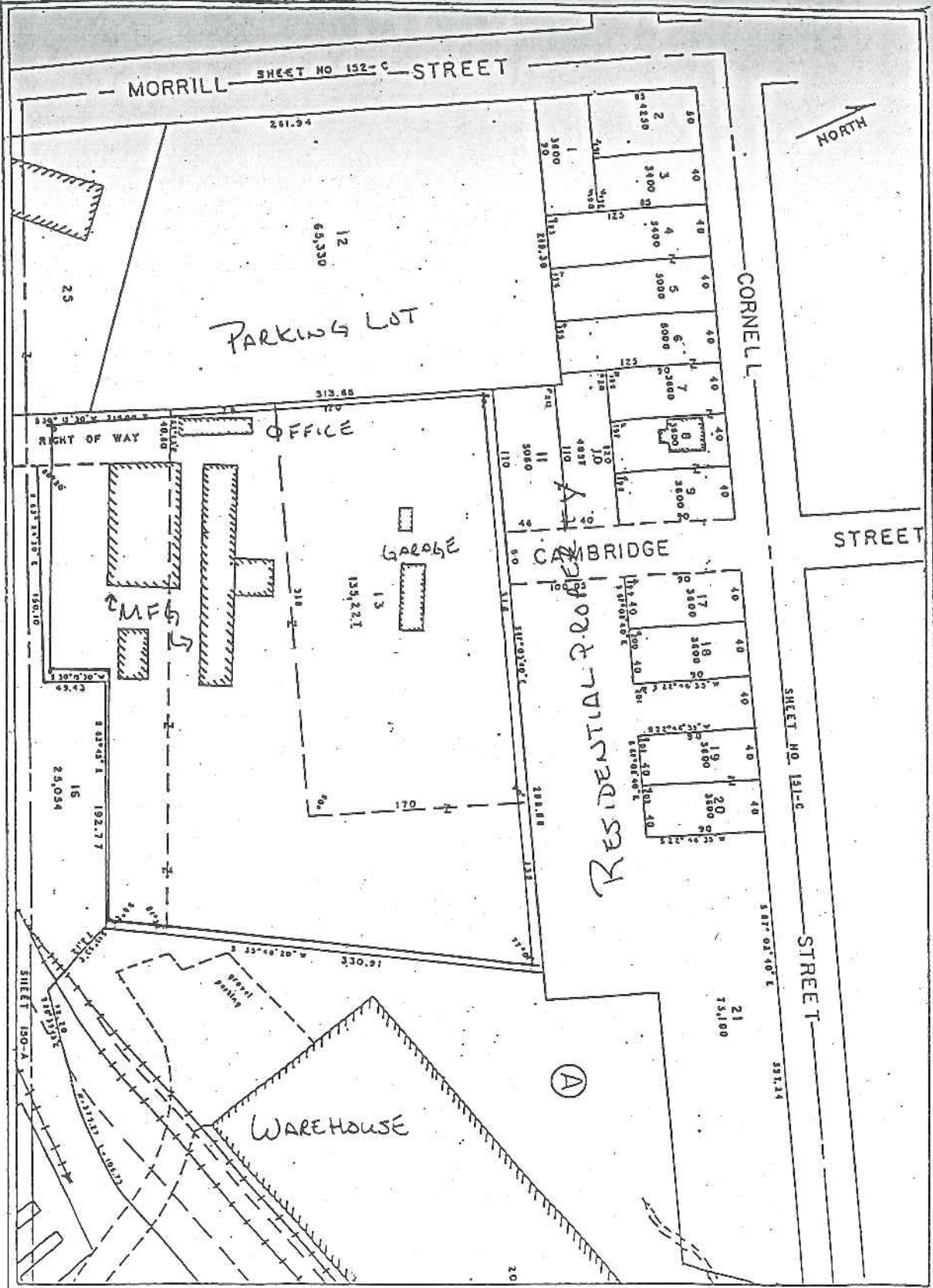
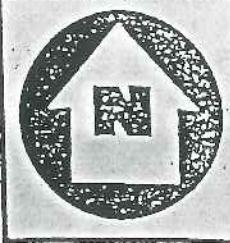
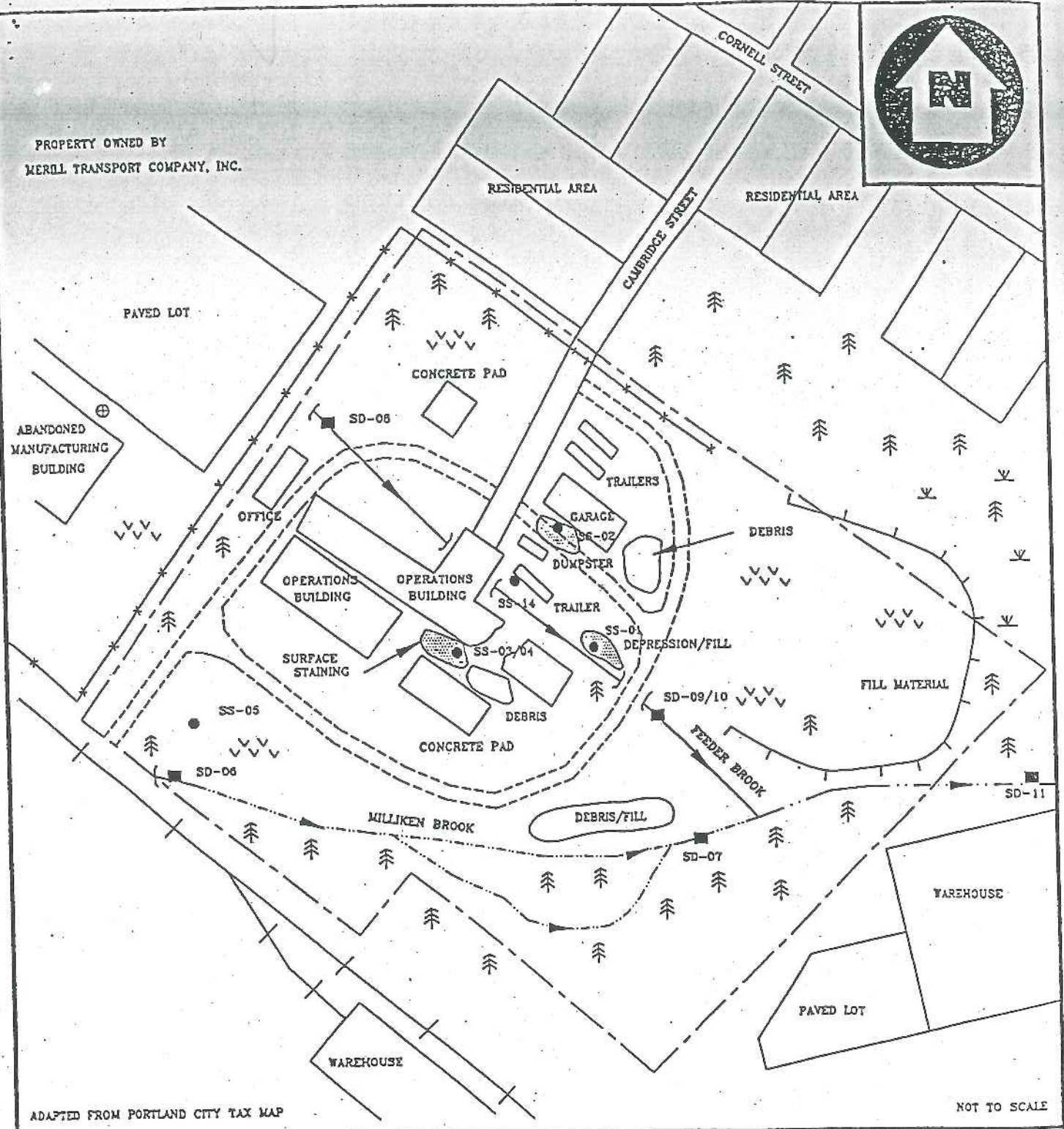


Figure 2
 Site Map
 Brownfield Site Assessment Report
 Burt Company – 1 Cambridge Street
 Portland, Maine



PROPERTY OWNED BY
MERRILL TRANSPORT COMPANY, INC.



ADAPTED FROM PORTLAND CITY TAX MAP

NOT TO SCALE

LEGEND

- | | | | | | |
|---------|----------------------|---------|--------------------|-----|--------------------------|
| -x-x-x- | FENCE WITH GATE | ∨∨∨∨ | GRASSY AREA | ■ | SEDIMENT SAMPLE LOCATION |
| ● | SOIL SAMPLE LOCATION | == | DIRT ROAD | ⊕ | MONITORING WELL |
| - - - - | PROPERTY BOUNDARY | ⌒ | WOODED AREA | ∩ | WETLAND AREA |
| + + + + | RAILROAD TRACKS | - - - - | INTERMITTENT BROOK |) (| CULVERT |

SITE SKETCH
BURT COMPANY
PORTLAND, MAINE

Figure 3
Sampling by RFW
Brownfield Site Assessment Report
Burt Company - 1 Cambridge Street
Portland, Maine

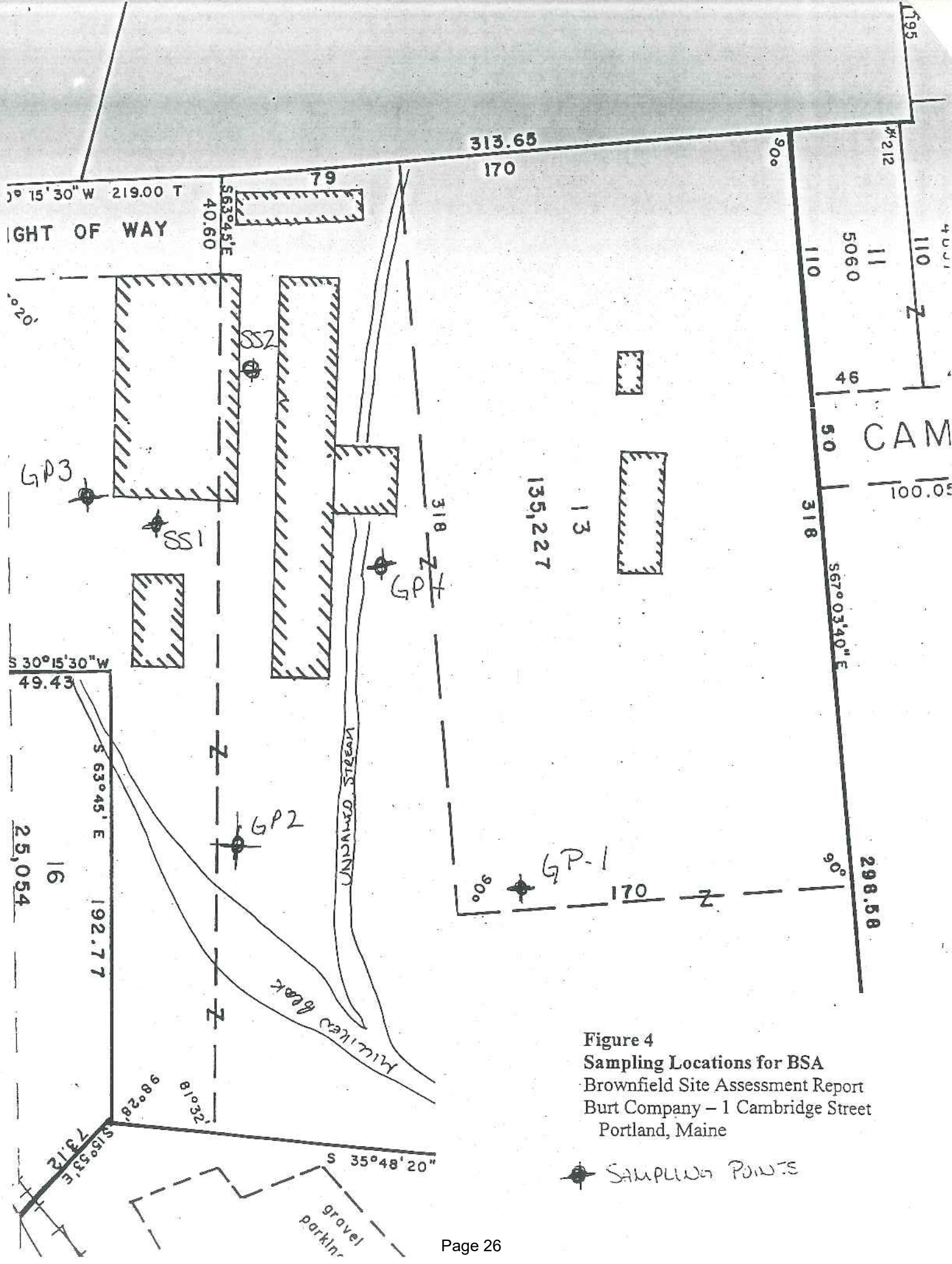


Figure 4
 Sampling Locations for BSA
 Brownfield Site Assessment Report
 Burt Company - 1 Cambridge Street
 Portland, Maine

⊕ SAMPLING POINTS

846 Main St., Suite 3
Westbrook, Maine 04092
Telephone 207-591-7000
Facsimile 207-591-7329
info@stgermain.com



January 25, 2008

Nicholas J. Hodgkins
Maine Department of Environmental Protection
BRWM-VRAP Program
17 State House Station
Augusta, Maine 04333-0017

Re: Voluntary Response Action Program Application
Parcel CP
Morrill's Crossing Project
Allen Avenue, Portland, Maine
St.Germain File No.: 2594.5

Dear Nick:

On behalf of MC Portland LLC, St.Germain & Associates, Inc. (St.Germain) is submitting the attached Maine Department of Environmental Protection (MEDEP) **Voluntary Response Action Program (VRAP) Application (Attachment A with fee)** for the above-referenced property (Site) in Portland, Maine. The Site is one of five parcels that are part of the approximately 20-acre Morrill's Crossing redevelopment project located just east of the intersection of Allen Avenue and Forest Avenue. **Figure 1, Site Redevelopment Plan**, shows the overall development plan and the Site. This parcel comprises the following municipal properties:

City of Portland Tax Map Information

Parcel Designation	Tax Map	Tax Block	Lot Number	Owner	Area (acres)
CP (aka City Lot)	151A	A	13 (full)	City of Portland	3.1

The Site is currently vacant and is characterized by a mix of open fields and woods. The Portland Water District provides drinking water and public sewer service to the surrounding area.

Environmental assessments conducted over the past three years are described in **Attachment B, Parcel CP Site Investigation Report**. This report includes a Phase I Environmental Site Assessment (ESA) consistent with the American Society of Testing and Materials (ASTM) Standard E 1527-05, as well as "All Appropriate Inquiry" as defined under the US Environmental Protection Agency "All Appropriate Inquiry" Final Rule (40 CFR Part 312).

SUMMARY OF SITE INVESTIGATION RESULTS

Conditions initially identified on this Site that warranted further assessment consisted of former, high-risk land use (e.g., billiard ball and poker chip manufacturer) and documented lead and arsenic impacts in soil. Several phases of test borings identified areas of elevated lead and arsenic in soil on the eastern half of the Site.

PROPOSED REMEDIAL ACTIONS

Cleanup Standards

At a meeting with St.Germain on October 4, 2007, Brian Beneski of the MEDEP stated the MEDEP Remedial Action Guideline (RAG) for Residential or Adult Worker/Trespasser would apply to the Site for the elevated lead and arsenic in soil (lead RAGs = 375 or 700 mg/kg and arsenic RAGs = 10 or 30 mg/kg). The specific standard would depend on the proposed land use and the implementation of institution controls.

Petroleum impacts were not identified on this parcel. However, at the same meeting, the MEDEP agreed that the Hydrocarbon Spill Decision Tree Baseline 2 guideline would apply to petroleum impacts that may be encountered during redevelopment of the Site. We propose using the Baseline 2 field screening threshold of 400 ppm (as measured by a qualified environmental professional with a photoionization detector (PID) calibrated to the MEDEP fuel oil standard). The MEDEP will be contacted if suspected petroleum hydrocarbon impacts are encountered at levels exceeding the Baseline 2 guideline.

Remedial Methods and Timing

Soil impacted with lead and arsenic will remain on-Site but will be isolated using engineering and institutional controls. The Site has two distinct redevelopment plans: the eastern 1/2 of the Site will be used for stormwater detention ponds while the western 1/2 will be occupied by a recreation field and associated parking (see Figure 1).

For the detention pond area, post-redevelopment surfaces with soil with lead or arsenic concentrations above the Adult Worker/Trespasser RAG (700 and 30 mg/kg, respectively) will be buried under 12 inches of fill, then vegetated or covered with rip rap. Soil with metal concentrations below the Adult Worker/Trespasser RAGs will be used for construction of the ponds without restriction but will be covered with rip rap or vegetated, depending on the location. The pond will be surrounded with fencing.

Post-redevelopment soil surfaces on the proposed recreation field site with lead or arsenic concentrations above the Residential RAG, as well as excess lead/arsenic-impacted soil generated from the detention pond construction, will be buried beneath the field under 12 inches of vegetated fill, building foundations, or asphalt pavement upon completion of redevelopment. Soil requiring isolation may be temporarily stockpiled before being replaced on-Site. This procedure may also require the temporary removal of clean soil, placement of impacted soil, and then replacement of fill.

Close coordination with the redevelopment contractor will be required to ensure that the impacted soil is handled, staged, and isolated in an efficient and safe manner. A redevelopment

contractor has not yet been selected, and it is possible that Site redevelopment plans may be slightly modified before the work is initiated. Therefore, St.Germain proposes to provide the MEDEP with a Remediation Work Plan for the management of metal-impacted soil at least two weeks prior to initiation of Site redevelopment, once a contractor has been hired and the redevelopment plans finalized. At a minimum, this plan will include the following details:

- Health and Safety Plan
- Metal-impacted soil volume estimates
- Soil staging procedures (if necessary) and erosion control methods
- Dewatering procedures (if necessary)
- Post-remediation confirmatory sampling methods
- Planned final location of isolated soils and type of engineering controls

No petroleum-impacted soil has been identified that will need to be removed. If petroleum impacts are found, the soil exceeding the Baseline 2 goal will be removed with an excavator and either temporarily staged on-Site in roll-off containers or live-loaded for off-Site disposal. St.Germain will notify the MEDEP no later than two weeks before excavation if petroleum-impacted soil is identified that warrants removal.

Removal Boundaries

Soil with elevated arsenic or lead levels will only be handled if necessary for Site regrading, and in all cases will be isolated on-Site using engineering controls. Therefore, measurement of the metal concentrations in excavations will not be needed. Instead, an XRF field survey of metal concentrations conducted by a qualified environmental professional will be conducted: 1) on the post-regrading detention pond surfaces that will be vegetated or covered with rip rap, to ensure that the surface does not exceed the Adult Worker/Trespasser RAG, and 2) on the post-regraded recreational field surfaces that will be vegetated or landscaped, before loam and seed or other landscaping material is placed, to ensure that any fill used to cap soil exceeding the Residential RAG has lead and arsenic levels below the RAG.

Horizontal excavation boundaries will be defined by a qualified environmental professional collecting representative soil headspace measurements of less than 400 ppm. Exceptions will include areas where removal of impacted soil could threaten the structural integrity of buildings, or damage buried utilities. Vertical excavation boundaries will be defined by representative soil headspace measurements of less than 400 ppm, or the water table, whichever is encountered first. Excavated areas will be backfilled.

Waste Characterization and Disposal

If metal-impacted soil cannot be reused on-Site, off-Site disposal options will be evaluated based on the quantity of soil and chemistry of the impacts.

For petroleum impacts where no tanks were known to exist, the soil will be tested as required by CPRC, Inc. Group (CPRC) of Scarborough, Maine with the intention of recycling it. If the soil does not meet the CPRC standards, other disposal options will again be evaluated based on the quantity of soil and chemistry of the impacts.

Monitoring Well Abandonment

St.Germain will abandon any remaining monitoring wells on the Site by removal and/or grouting.

REPORTING AND DOCUMENTATION

As discussed above, a Remediation Work Plan will be submitted to the MEDEP at least two weeks before initiation of Site redevelopment.

Upon completion of the redevelopment, St.Germain will prepare a Site Remediation Report documenting the methods and location of soil removal or relocation, soil volumes, maps, confirmatory sampling, and disposal documentation, if necessary. St.Germain anticipates that the Site will be classified as Tier I with respect to the MEDEP VRAP Public Communication Matrix, and therefore public communication will be limited to public listing of the Site by the MEDEP on their "Sites List Database". This report will be submitted to the MEDEP with the request that a Certificate of Completion be prepared for the VRAP applicant. The applicant will then prepare an Environmental Covenant with appropriate activity and use limitations which will include:

- 1) No ground water drinking supply wells will be located on the Site.
- 2) Site use will be restricted to commercial, recreational, or industrial activities unless prior approval is given by the MEDEP.
- 3) If future Site activities require removal or penetration of the engineering controls in a manner that would lead to prolonged and direct contact with soil with lead or arsenic concentrations above the Adult Worker/Trespasser RAG, the MEDEP will be notified beforehand and provided with a Health and Safety Plan that will be made available to site workers that will address the potential risk.
- 4) If encountered, petroleum impacts left in place because of buildings or utilities, but later made accessible due to building or utility removal, will be excavated following the Baseline 2 guidelines. MEDEP will be notified prior to this activity.

SCHEDULE

Site redevelopment is scheduled to occur during 2008/2009. St.Germain will provide the MEDEP with the Remediation Work Plan at least two weeks before redevelopment begins. A Site Remediation Report will be prepared within eight weeks of completion of the remediation work.

SUMMARY

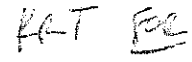
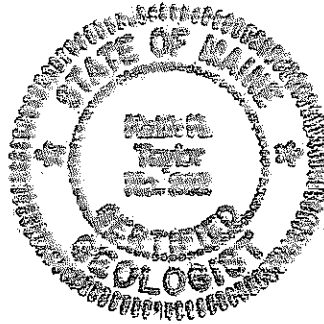
Based on the ESA work and the proposed remedial actions, we request a No Action Assurance Letter under the VRAP. If you have any questions regarding this application, please do not hesitate to contact us.

Sincerely,

ST.GERMAIN & ASSOCIATES, INC.



Keith R. Taylor, C.G.
Senior Hydrogeologist



Scott D. Collins, P.E.
Vice President

Attachments

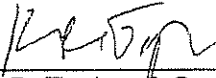
cc: MC Portland, LLC
John Hession, VHB
Natalie Burns, Esq., Jensen Baird
Linda Costanzo, Stop & Shop
Bill Bullard, MEDEP (all except VRAP application and fee)

SITE INVESTIGATION REPORT
PARCEL CP
MORRILL'S CROSSING PROJECT
ALLEN AVENUE
PORTLAND, MAINE

Prepared For:

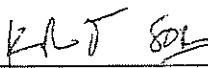
MC Portland, LLC
c/o Packard Development
One Wells Avenue
Newton, Massachusetts 02459

January 25, 2008
St.Germain File No.: 2594.5



Keith R. Taylor, C.G.
Senior Hydrogeologist

1/25/08
Date



Scott D. Collins, P.E.
Vice President

1/25/08
Date

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Figure 2:	Site Aerial Photograph
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APPENDICES

Appendix A:	Historical Records
Appendix B:	Historical Environmental Records
Appendix C:	Municipal Records
Appendix D:	FirstSearch™ Report
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Appendix F:	2005 Soil Boring Logs
Appendix G:	2005 Laboratory Reports
Appendix H:	2006 Laboratory Reports
Appendix I:	R.W. Gillespie Memo and Data, November 7, 2006
Appendix J:	2007 Laboratory Reports

1.0 EXECUTIVE SUMMARY

This report documents environmental site assessments conducted on Parcel CP for the proposed Morrill's Crossing project in Portland, Maine. These assessments were completed in anticipation of the redevelopment of the land into stormwater detention ponds and a recreation field with associated parking. The purpose of the assessments was to identify environmental impacts that could affect the redevelopment plans. The assessment process began with a 2005 review of available government, historical, and environmental records and site reconnaissance to identify conditions that would require site-specific sampling (Phase I Environmental Site Assessment). Soil borings and laboratory testing was subsequently completed in 2005, 2006, and 2007 (Phase II Environmental Assessments).

Conditions initially identified on this parcel that warranted further assessment consisted of former, high-risk land use (e.g., billiard ball and poker chip manufacturer) and documented lead and arsenic impacts in soil. Several phases of test borings identified areas of elevated lead and arsenic in soil on the eastern half of the lot. Depending on the future land use and post-development grades, impacted soil may need to be removed or buried on-site to meet MEDEP RAGs for Residential or Adult Worker standards.

2.0 INTRODUCTION

2.1 Purpose

St.Germain & Associates, Inc. (St.Germain) has prepared this report to document the results of Phase I and II Environmental Site Assessment (ESA) investigations conducted on the CP Parcel (Site) between 2005 and 2007 for the proposed Morrill's Crossing project in Portland, Maine. These investigations were completed in anticipation of the redevelopment of the abandoned industrial land into stormwater detention ponds, a recreation field, and associated parking. The assessments focused on the identification of environmental impacts that could affect the redevelopment plans, and if present, to provide data to develop remedial action plans to address these impacts.

2.2 Site Description and History

The overall redevelopment property is located on Allen Avenue in Portland, Maine, just east of the intersection with Forest Avenue (**Figure 1, Site Location Map**). The Site is one of five parcels that are part of an approximately 20-acre property targeted for redevelopment. The Site is located on the far eastern end of the redevelopment property and is bounded on the west by the A2-BF and A2-RU subparcels. City of Portland Tax Map lot number, owner, and parcel area are summarized below.

Development Parcel and Portland Tax Map Designations

Parcel Designation	Tax Map	Tax Block	Lot Number	Owner	Area (acres)
CP (aka City Lot)	151A	A	13 (full)	City of Portland	3.1

Figure 2, Site Aerial Photograph, shows the overall redevelopment property with the parcel designations and existing conditions as of 2001. On a regional scale, the redevelopment property is located in a mixed residential and commercial portion of Portland with mostly residences to the north and east and commercial buildings to the west and south. A series of active railroad tracks define the southwestern side of the property. The Site itself is currently unoccupied and is characterized by a mix of open fields and woods. The Portland Water District provides drinking water and public sewer service to the surrounding area.

According to Sanborn Fire Insurance Maps (see **Appendix A, Historical Records**), the Site has been used from the 1800s to the 1980s as a billiard ball and poker chip manufacturer (the Burt Company). The buildings associated with this business have been removed. **Figure 3, Historical Land Use and RECs**, depicts current and historical structures and their uses for the Site and adjacent development area.

2.3 Topographic and Geologic Setting

The Site is relatively flat topographically with a gentle slope to the southeast except along the far eastern edge, which drops abruptly down to Milliken Brook. The Site is bisected by a drainage ditch that runs from west to east and discharges into Milliken Brook. Milliken Brook flows into Fall Brook which in turn discharges into Back Bay, a tidal inlet about 1 mile southeast of the Site.

According to the Maine Geological Survey (MGS) Surficial Geology Map of the Portland West Quadrangle (Open File 97-51), the Site is underlain by the Presumpscot Formation, consisting of clay, silt, and minor sand. The MGS Bedrock Geology of the Portland 1:100,000 Quadrangle Map (Open File 98-1) shows the Hutchins Corner Formation, a biotite and calc-silicate gneiss with migmatite bands and a northeast regional fabric, beneath the Site. This rock type is consistent with bedrock exposures observed in the west part of the Site.

Soil borings advanced on the overall development property and described in Sections, 4.0, 5.0, 6.0, and 7.0 encountered clay, silt, and sand deposits consistent with the Presumpscot Formation, as well as organic swamp deposits and a basal layer of glacial till. A variety of fill materials consisting mostly of silt, sand, and gravel was also present. Borings advanced on the Site encountered up to eight feet of fill overlying marine clay. Overburden thicknesses ranged from zero where bedrock is exposed on the west side of the Site to over 14 feet to the east, where bedrock was not encountered.

A ground water contour map prepared in 1986 (See Section 2.4 for details) showed ground water across the overall development property flowing to the southeast with water table depths ranging from about 3 to 4 feet. Ground water was encountered in a monitoring well installed in 2006 by others on the Site at 6 feet below grade (see Section 5.0 for details). These depths and flow direction are consistent with Site topography and geology.

2.4 Environmental Assessment History

Several environmental assessments were conducted on the Site between 1990 and 1999 and are summarized below (see **Appendix B, Historical Environmental Records**). This information was collected as part of the Phase I ESA described in Section 3.0.

In 1990, the MEDEP investigated the abandoned Burt Company facility in response to public complaints of vandalism, fires, and chemical spills. The MEDEP confirmed the presence of unsecured buildings, chemicals dispersed by vandals, and waste piles. The MEDEP secured the buildings and later removed some of the chemicals and waste but recommended a more extensive assessment. The MEDEP formally designated the Burt Company site as an Uncontrolled Hazardous Substance Site in 1991.

In 1992, Roy F. Weston, a contractor for the US Environmental Protection Agency (USEPA), conducted a Final Site Inspection of the Burt Company site under CERCLA. Their report documents the site history and conditions in detail, and includes the results of limited soil sampling, which showed elevated concentrations of several heavy metals including lead and arsenic.

In 1999, the MEDEP completed a Brownfields Site Assessment of the Burt Company site. MEDEP collected soil and ground water samples from four locations for analysis of VOCs, semi volatile organic compounds (SVOCs), and heavy metals. Concentrations of lead, arsenic, zinc, and cadmium from one soil sample (GP-2) were above the MEDEP Residential Remedial Action Guidelines (RAGs). This sample location corresponded with the presence of colored dyes and plastic debris in the soil. The ground water samples did not show significant impacts with respect to metals except for elevated arsenic and lead at GP-2. Low levels (less than 6 parts per billion (ppb)) of the VOC methyl tertiary butyl ether (MTBE) were detected in three of the

ground water samples. The MEDEP recommended additional characterization to determine the full extent of metal impacts and whether capping or removal would be appropriate. The MEDEP subsequently provided the City of Portland with a letter describing conceptual remedial options.

To the best of our knowledge, no other environmental testing or investigations related to petroleum products or hazardous substances were conducted on the Site prior to 2005.

2.5 Remediation Standards

In 2005 and 2007, St.Germain discussed potential remediation requirements with Mr. Brian Beneski of the MEDEP based on data available at those times. Because of the lack of private water supply wells in the area and only limited evidence for ground water impacts on the Site, the MEDEP stated that only impacted soil would need to be considered for remediation.

For metal impacts, the MEDEP concluded that the cleanup standard will depend on the future use of the property but would follow the MEDEP Remedial Action Guidelines (RAGs). The RAGs assign concentration thresholds for metals based on the land use (Residential, Adult Worker, and Trespasser). For lead and arsenic, the RAGs for Adult Worker and Trespasser are the same. According to the MEDEP, the planned use of the eastern part of the CP parcel for stormwater detention ponds would allow a MEDEP RAG Trespasser guideline to be applied since this area will be fenced and not accessible by the public. In contrast, areas expected to be frequented by the public without pavement or buildings covering the soil (i.e., the recreational field) would need to meet the Residential RAGs. Other strategies may also be considered such as placing a buffer layer of clean fill on top of the impacted soil.

For petroleum impacts, the MEDEP is requiring adherence to the Hydrocarbon Spill Decision Tree (Decision Tree) Baseline 2 goal to the extent possible. The Baseline 2 goal is based on field-screening levels exceeding 200 to 400 ppm or laboratory-based Diesel Range Organics results over 50 to 100 mg/kg. The exact threshold will be determined by the MEDEP as part of their approval of a remediation work plan. Areas of impacted soil that may be encountered in the future during redevelopment shall be removed and disposed of or processed off-site if it exceeds this cleanup goal. Exceptions may include soil below utilities or the water table.

3.0 2005 PHASE I ENVIRONMENTAL SITE ASSESSMENT

3.1 Methods

St.Germain completed a Phase I ESA of the Site in 2005 consistent with the American Society of Testing and Materials (ASTM) Standard E 1527-00. This report updates this work so that it complies with the newer ASTM Standard E 1527-05 as well as "All Appropriate Inquiry" as defined under the US Environmental Protection Agency "All Appropriate Inquiry" Final Rule (40 CFR Part 312).

The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) as defined in ASTM Standard. A "recognized environmental condition" is "the presence or likely presence of any hazardous substances (i.e., as defined under CERCLA) or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The ASTM definition does not include "de-minimis" conditions, which generally do not present risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. Therefore, de-minimis conditions are not considered RECs.

3.1.1 Site Reconnaissance

St.Germain conducted an initial reconnaissance of the Site on February 9 and 14, 2005 to determine current conditions related to the following issues: petroleum and/or hazardous substances storage and handling; underground storage tanks (USTs) and aboveground storage tanks (ASTs); spills and/or dumping of petroleum and/or hazardous substances, polychlorinated biphenyl (PCB)-containing equipment or material; and solid and universal waste. St.Germain also inspected abutting properties as visible from the Site for the same conditions. In March and May 2005, in December 2006, and November 2007, St.Germain re-visited much of the Site in preparation for and during the completion of Phase II ESA work, and did not observe any new RECs.

3.1.2 Local/Historical Records Review

St.Germain reviewed municipal files at the City of Portland offices including the Assessor's and Planning Offices. These records were reviewed to identify correspondence, permits, or other documentation that may indicate the past or current presence of RECs. St.Germain also obtained Sanborn Fire Insurance Maps (see Appendix A).

3.1.3 Federal and State Records Review

Federal and State databases were first reviewed in February 2005 by using a database search provided by FirstSearch™ Technology Corporation (FirstSearch™) of Dedham, Massachusetts. The FirstSearch™ report includes information compiled from the following Federal databases: National Priority List (NPL); Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS); No Further Response Action Planned (NFRAP); Resource Conservation and Recovery Act (RCRA); Transportation Storage and Disposal (TSD);

RCRA CORRACTS (facilities subject to Corrective Action under RCRA); RCRA Generators; Emergency Response Notification System (ERNS). State databases included: landfills, registered underground storage tanks (USTs), hazardous waste sites, leaking underground storage tanks (LUSTs), spill sites, Voluntary Response Action Program (VRAP) Sites, and Tribal Lands.

Based on the database search, St.Germain subsequently reviewed regulatory files at the MEDEP office in Augusta, Maine on December 20, 2006.

The database search was updated in November 2007 and is included as **Appendix D, FirstSearch™ Report**. Reports documenting on-Site spills or releases were identified as potential RECs. No off-Site reports were identified that represented an REC for the Site because of distance, age of release, topography, and/or completed remediation actions.

3.1.4 Data Gaps, Limitations, and Additions

St.Germain did not identify data gaps that would significantly affect the completeness of this ESA. Limitations to the ASTM E 1527-00 standard consisted of the following:

- In February 2005, the ground surface was covered by six to 12 inches of snow, obscuring views of Site soils, but the Site was re-visited a few months later after the snow had melted.

As discussed in Sections 4.0, 5.0, and 7.0, Phase II ESAs were later conducted outside the ASTM E1527-05 standard.

3.2 Private Well Survey

St.Germain conducted a private well survey within 2,500 feet of the Site by obtaining a map of Portland Water District (District) transmission lines in the area, as shown in **Appendix E, Portland Water District Mains**. Based on a review of this map, local reconnaissance, and discussions with District staff, no private water wells were identified in the search radius.

3.3 Results

Based on the 2005 Phase I ESA work, St.Germain identified two RECs on the Site. Unless otherwise noted, the RECs were based on historical environmental records (Appendix B) or the FirstSearch™ report (Appendix D).

REC CP-1 (Documented Metal Impacts)

Documented elevated metal impacts to soil was considered a REC.

REC CP-2 (Historical Property Use)

The historical presence of fuel storage tanks, existence of fill material, and use of the property as a billiard ball and poker chip manufacturer were considered RECs.

4.0 2005 PHASE II ENVIRONMENTAL SITE ASSESSMENT

Field investigations were conducted in March and May 2005 to address the RECs described in the previous section.

4.1 Methods

In March 2005, St.Germain advanced 11 soil borings, installed one monitoring well, and collected 11 soil samples and one ground water sample for laboratory analysis. Using a Geoprobe drill rig operated by ESN NorthAtlantic (ESN) of Scarborough, Maine, soil borings were generally advanced to a depth of 10 to 12 feet or refusal, whichever was encountered first. Soil samples were collected continuously, classified by soil type, and field-screened for volatile organic compounds (VOCs) using a Thermo Electron Corporation 580B photo ionization detector (PID) calibrated to the MEDEP setpoint of 320 for diesel range organics. In addition, soil samples were assessed for visible and olfactory evidence of petroleum or other impacts. Soil samples exhibiting elevated PID levels were also field-tested for petroleum "saturation" using MEDEP protocol. Select samples were submitted to Maine Environmental Laboratory (MEL) in Yarmouth, Maine for analysis of diesel range organics (DRO), volatile organic compounds (VOCs), or RCRA 8 metals.

The location of the borings and analytical suite generally reflected the REC location, known or suspected type of impact, and/or PID or visual evidence of impacts. **2005 Boring Logs** are included in **Appendix F** and boring locations are shown on **Figure 4, Site Soil Boring Locations**.

On May 5, 2005, St.Germain conducted a surface soil analysis program to address the detected heavy metals in historical and the March 2005 sampling. A 50-foot grid was established across the lot (see **Figure 5, 2005 CP Parcel Surface Soil Lead Sampling Plan**). Exposed mineral soil was analyzed in place at 74 locations for total lead using an Innov X-Ray Fluorescence analyzer (XRF). Seven samples were collected from these locations and submitted to MEL for independent analysis of lead.

A summary of the borings and soil sample analyses is provided below

Summary of 2005 Soil Borings and Analysis

Parcel	Boring	DRO	VOCs	Metals
CP	B-29 to B-39	B-29, B-30, B-37, B-38	B-29, B-39*	B-31, B-32, B-33, B-34, B-35, B-36, B-37, B-39*
	1-74	None	None	Lead only**

* = ground water only.

** = most analyzed with XRF only.

St.Germain contoured the lead field results using the commercially available program Surfer Version 8.0 by first creating a synthetic grid based on the existing data using the Point Kriging method. This method represents a generic approach to contouring that does not include directional bias. The grid spacing was chosen manually with spacing in the X- and Y-direction of about 0.6 meters. Kriging can result in grid points with Z-values (i.e., lead concentrations)

above the maximum reported and can produce negative values. Therefore, the grid was further modified to eliminate negative numbers before contouring. St.Germain selected contour intervals of 375, 700, 1,000, and 2,000 mg/kg for contouring. Results are discussed in the following section.

4.2 Results

Analytical results for the March 2005 investigation are summarized on **Table 1, Soil Boring Sampling Results** and **2005 Laboratory Reports** are included as **Appendix G**. PID readings for soil borings are included on the logs in **Appendix E**. The surface soil field results are summarized on **Table 2, May 2005 CP Parcel Surface Soil Lead Results**.

The primary REC on the CP Lot was the documented presence of elevated metals, likely from the former use of the property as a billiard ball and poker chip manufacturer. Several of the March 2005 borings encountered brightly colored materials indicative of dyes. Eleven soil samples from varying depths were analyzed for metals and elevated arsenic and/or lead was detected in about half of the samples. A sample from a depth of 4.5 feet at B-34 exhibited a lead concentration over 100,000 mg/kg. As shown on Table 1, many of the arsenic and lead levels are above the Residential and Adult Worker/Trespasser RAGs. The single ground water sample collected on the CP Lot (B-39) did not show elevated metal concentrations and VOCs were not detected.

The data from XRF surface soil testing for lead in May 2005 are summarized on Table 2 and a contour map is provided as Figure 5. Comparison of the field results with laboratory results are summarized on **Table 3, XRF and Laboratory Results Comparison**. The average Relative Percent Difference (RPD) for the seven lead samples with laboratory results was 29%, which indicates that the XRF data were of acceptable quality based on the commonly used 30% threshold.

As discussed in Section 2.5, either the Residential or Adult Worker/Trespasser MEDEP RAG will apply for remediation, depending on the site development plans. The 375 mg/kg contour value represents the Residential RAG while 700 mg/kg represents the Adult Worker/Trespasser RAG. The contour map shows that most of Parcel CP surface soil exhibit less than 100 mg/kg. Exceptions include an isolated area at the southwest corner of the parcel where one sample showed a lead concentration slightly above 1,000 mg/kg (Sample 44), but this appears to be slightly outside the parcel boundary. Results from the surrounding samples declined rapidly. A larger area of elevated lead on the surface is present in the northeast corner, although again, a few of the sample locations appear to be just over the parcel line. Seven samples in this area exhibit lead levels over 1,000 mg/kg and concentrations over the 700 mg/kg RAG extend over an area about 100 feet by 200 feet in area.

5.0 2006 PHASE II ENVIRONMENTAL SITE ASSESSMENT

In December 2006, St.Germain completed Phase II assessments to further characterize soil impacts identified during 2005. Twenty-six geoprobe and 11 hand auger borings were advanced to assess the extent of known lead and arsenic impacts in soil (see **Figure 6, 2006/2007 CP Parcel Lead and Arsenic Soil Boring Locations**).

5.1 Methods

Soil borings were advanced using a Geoprobe drill rig operated by ESN. Borings were advanced to 10 feet or refusal, whichever was encountered first, and continuous soil samples were collected at each boring location. The soil was not classified or screened with a PID since arsenic and lead were the target contaminants. Soil samples from each two-foot interval were poured into a decontaminated plastic mixing container and homogenized with a stainless steel mixing paddle attached to a cordless drill. After mixing, the sample was qualitatively assessed for moisture content and organics. The soil sample was transferred to a poly bag, labeled, and placed on the XRF window for screening of lead and arsenic. St.Germain submitted eight confirmation samples for independent laboratory analysis to Northeast Laboratory (NEL) of Winslow, Maine. **2006 Laboratory Reports** are provided in **Appendix H**.

Because of a steep embankment, some of the samples (labeled HA) were collected with a hand auger. St.Germain advanced a pre-cleaned 6-inch long, 3.5-inch diameter stainless steel auger in 0.5 foot increments to a total depth of 4.0 feet or refusal, which ever was encountered first. Each two-foot interval was screened for lead and arsenic with the XRF as described above.

Comparison of field and laboratory results is presented on Table 3. The lead RPD for these samples was 64%, which is higher than the 30% threshold often used to assess accuracy. However, two XRF samples with reported lead concentrations over 25 mg/kg were reported by the laboratory to have levels below 10 mg/kg, hence the XRF bias was toward over-reporting the concentration. The RPD for arsenic was more difficult to assess because many of the XRF measurements were reported as below the instrument detection limit, but useable data give an RPD of 38%. Again, one XRF sample was biased high and skewed the results.

Figure 6 shows the location of the 2006 geoprobe and hand auger borings. The geoprobe borings were advanced on the same grid established for the 2005 surface soil measurements but were given the CP- designation from CP-1 to CP-26. As will be described in Section 7.0, additional borings were advanced in a similar manner in 2007 and are also shown on this figure.

5.2 Results

XRF data from the geoprobe and hand auger borings on the CP Lot are summarized on **Table 4, CP Parcel Lead and Arsenic Results**. In order to assess the feasibility of burying metal-impacted soil beneath the recreational field, additional sampling was conducted in 2007 and the combined results are discussed in Section 7.0.

6.0 2006 GEOTECHNICAL SOIL BORINGS

Seven geotechnical test borings were advanced to refusal on the Site in 2006 by R.W. Gillespie & Associates, Inc. At St.Germain's request, soil samples from each boring were screened in the field using a PID. The environmental component of their work is summarized in **Appendix I, R.W. Gillespie Memo and Data, November 7, 2006**. This report indicates that the samples from the Site did not exhibit elevated soil headspace. Visual observations suggestive of environmental impacts were limited to occasional organic odors. **Figure 7, R.W. Gillespie Geotechnical Soil Boring Locations**, shows the broad extent of the borings. The lack of evidence of significant or widespread impacts supports the focus of the St.Germain investigations of RECs identified during the Phase I ESA.

7.0 2007 PHASE II ENVIRONMENTAL SITE ASSESSMENTS

Investigations conducted in October 2007 focused on the feasibility of burying metal-impacted soil beneath the recreational field by extending the sampling area to the west.

7.1 Methods

Soil borings were advanced and samples were analyzed for lead and arsenic following the procedures described in Section 5.1 with the existing grid expanded to the west. Twenty-six new borings were advanced (CP-101 to CP-127) and the data are presented in Table 4. Concentration contour maps for each 2-foot depth interval were produced as described in Section 4.1. St.Germain submitted seven confirmation samples for independent laboratory analysis to NEL. 2007 Laboratory Reports are provided in Appendix J.

The lead RPD for the samples was 46%, which is higher than the 30% threshold. However, one XRF result was significantly higher than the associated laboratory result (25 vs. 6 mg/kg), hence the XRF bias was toward over-reporting the concentration. The RPD for arsenic was 58%. Most of the variability was biased toward high XRF readings. Overall, these data are considered of acceptable quality because of the number of samples and generally high bias for the XRF.

7.2 Results

Lead and arsenic concentration contours for each two-foot depth interval are illustrated on Figure 8, 2006/2007 CP Parcel Subsurface Soil Lead Concentrations, and Figure 9, 2006/2007 CP Parcel Subsurface Soil Arsenic Concentrations, respectively. Lead concentrations in the 0 to 2-foot and 2 to 4-foot depth intervals are similar with the highest concentrations in the northeast corner, some over 2,000 mg/kg. Another isolated area of elevated lead was also detected in the southeast corner.

All but one of the remaining samples from 0 to 4-foot interval showed lead levels below the Residential RAG of 375 mg/kg. Samples at isolated locations from the 4 to 6-foot and 6 to 8-foot intervals show lead above 375 mg/kg, in some cases in the 1,000 to 2,500 mg/kg range (B-35 and CP-10) and at one location over 100,000 mg/kg (B-34). Data from B-34 and B-35 at this depth were not used in the contouring because of the extreme variation from the nearest samples. All three of these samples (B-34, B-35, and CP-10) are located on the far east side of the parcel. None of the samples from 8 to 10 feet showed lead above 375 mg/kg.

Figure 9 indicates that arsenic concentrations are much more variable compared to lead. A few samples from all three sampled intervals between 0 and 6 feet show arsenic over 100 mg/kg. Concentrations between 30 and 100 mg/kg (above the Adult Worker/Trespasser RAG) are particularly widespread in the 4 to 6-foot depth interval. Arsenic levels decline from the 4-foot to the 10-foot depth, with most of the samples from 8 to 10 feet below the Residential RAG of 10 mg/kg.

8.0 SUMMARY

St.Germain identified the following environmental impacts on the parcel:

Parcel	Impacts	Potentially Applicable Standards	Comments
CP (City Lot)	<ul style="list-style-type: none"> ▪ Areas of high lead and arsenic in shallow soil; lower but still elevated arsenic levels widespread at depth. 	<ul style="list-style-type: none"> ▪ MEDEP RAG for Adult Worker/Trespasser for proposed retention pond at eastern side. ▪ Other areas dependent on final use of land. ▪ Lead RAGs = 375/700 mg/kg. ▪ Arsenic RAGs = 10/30 mg/kg. 	<ul style="list-style-type: none"> ▪ Isolated exceedences of both lead RAGs. ▪ Widespread exceedences of both arsenic RAGs.

9.0 LIMITATIONS

This report is based on the work scope described herein and referenced sources, and is in turn limited by the work scope and the conditions of the Site. No other warranty, expressed or implied, is indicated. This report is based upon information available at the time of this submittal. Should information not included in this report be obtained, St.Germain reserves the right to amend | findings.

Table 1
Soil Boring Sampling Results
Parcel CP
Morrill's Crossing Project
Portland, Maine

Compound		Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver	DRO	VOCs
MEDEP PRGs - Baseline 2		NS	NS	NS	NS	NS	NS	NS	NS	50-100	NS
MEDEP RAGs - AW		30	10,000	23	10,000 (Cr ⁺⁶)	700	610	10,000	10,000	NS	varies
MEDEP RAGs - R		10	10,000	27	950 (Cr ⁺⁶)	375	60	950	950	NS	varies
Lot	Sample	Depth (ft)	Date								
CP	B-29	8-12	Mar-05	NA	NA	NA	NA	NA	NA	ND	ND
CP	B-30	0-4	Mar-05	NA	NA	NA	NA	NA	NA	ND	NA
CP	B-31	0-2	Mar-05	7.2	20J	12	0.11	0.1J	ND	NA	NA
CP	B-32	0-2	Mar-05	175	2,900	140	0.2	ND	ND	NA	NA
CP	B-33	6-8	Mar-05	42	970	74	0.47	0.1J	ND	NA	NA
CP	B-34	4.5-4.8	Mar-05	26	490	28	0.14	ND	ND	NA	NA
CP	B-35	4.5-5.5	Mar-05	199	5,220	67	2.63	3.7	ND	NA	NA
CP	B-36	3.9-4	Mar-05	41	2,200	24	100	0.4J	ND	NA	NA
CP	B-37	0-2	Mar-05	11.5	80	34	0.07	ND	ND	NA	NA
CP	B-37	2-4	Mar-05	NA	NA	NA	NA	NA	NA	26	NA
CP	B-38	0-2	Mar-05	NA	NA	NA	NA	NA	NA	23	NA
CP	B-39	GW	Mar-05	ND	0.1J	ND	0.0003J	ND	ND	NA	ND

- 1 Data in mg/kg unless otherwise noted.
- 2 Bold = compound detected in the sample.
- 3 Shaded = exceeded the most stringent standard.
- 4 ND = Not detected above the quantification limit.
- 5 NA = Not analyzed.
- 6 NS = No Standard.
- 7 GW = ground water with data in mg/l.
- 8 J = Concentration estimated by laboratory.
- 9 MEDEP RAGs = MEDEP Remedial Action Guidelines for Contaminated Soils - November 18, 1997. AW = adult worker, R = residential.
- 10 MEDEP PRGs = MEDEP Hydrocarbon Spill Decision Tree for Baseline 2 sites.
- 11 VOCs = Volatile Organic Compounds (EPA Method 8260).
- 12 DRO = Diesel Range Organics (HETL Method 4.1.25).
- 13 Only detected VOCs shown in Table 1. See Laboratory Reports, including quantification limits and estimated values.
- 14 Sample locations shown on Figure 4.

Table 2
 May 2005 CP Lot Surface Soil Lead Results
 Morrill's Crossing Project
 Portland, Maine

Sample Location	Lead (mg/kg)
1	33
2	27
3	39
4	48
5	44
6	83
7	192
8	2,654
9	691
10	1,651
11	930
12	208
13	95
14	56
15	88
16	34
17	11
18	52
19	39
20	57
21	35
22	110
23	196
24	2,452
25	121
26	102
27	65
28	62
29	70
30	110
31	38
32	41
33	44
34	87
35	28
36	36
37	38
38	20
39	53
40	32
41	46
42	44
43	42
44	1,073
45	50
46	68
47	20
48	28

Sample Location	Lead (mg/kg)
49	56
50	84
51	250
52	17
53	32
54	51
55	101
56	164
57	237
58	121
59	54
60	72
61	1,628
62	43
63	49
64	657
65	351
66	1,438
67	2,346
68	470
69	121
70	152
71	68
72	642
73	149
74	55

1. Data collected on May 5, 2006 using an Innov X-Ray Fluorescence analyzer.
2. Data in mg/kg.
3. Sample locations shown on Figure 5.
4. Laboratory confirmation data for XRF results in Table 3.
5. MEDEP Remedial Action Guideline Residential Standard = 375 mg/kg
6. MEDEP Remedial Action Guidelines Adult Worker/Trespasser Standard = 700 mg/kg.
7. Shaded = exceedence of most stringent standard.

Table 3
XRF and Laboratory Results Comparison
Parcel CP
Morrill's Crossing Project
Portland, Maine

Sample Date	Sample ID	Depth (ft)	Lead Results				Arsenic Results										
			XRF Result	+/-	Low	High	Analytical Result	RPD	RPD Range	XRF Result	+/-	Low	High	Analytical Result	RPD	RPD Range	
CP Lot Surface Samples	5/5/05	16	Surface	34	NA	NA	NA	41	-18	NA	NA	NA	NA	NA	NA	NA	
	5/5/05	21	Surface	35	NA	NA	NA	14	86	NA	NA	NA	NA	NA	NA	NA	
	5/5/05	40	Surface	32	NA	NA	NA	30	8	NA	NA	NA	NA	NA	NA	NA	
	5/5/05	37	Surface	38	NA	NA	NA	27	34	NA	NA	NA	NA	NA	NA	NA	
	5/5/05	44	Surface	1,073	NA	NA	NA	1,185	-10	NA	NA	NA	NA	NA	NA	NA	
	5/5/05	8	Surface	2,654	NA	NA	NA	3,040	-14	NA	NA	NA	NA	NA	NA	NA	
CP Lot Borings	5/5/05	66	Surface	1,438	NA	NA	NA	2,070	-36	NA	NA	NA	NA	NA	NA	NA	
	12/8/06	CP-3	2-4	39	3	36	42	9	128	123 to 132	20	2	18	22	15	29	17 to 39
	12/8/06	CP-7	2-4	26	3	23	29	5	134	127 to 140	6	2	4	8	11	52	-84 to -26
	12/8/06	CP-10	0-2	2,634	22	2,612	2,656	3,600	-31	-32 to -30	0	40	-40	40	43	NA	NA to -8
	12/8/06	CP-13	0-2	147	4	143	151	110	29	26 to 31	16	3	13	20	10	51	28 to 68
	12/8/06	CP-18	4-6	610	8	602	618	860	-34	-35 to -33	24	6	18	30	29	-20	-48 to 2
	12/8/06	CP-26	6-8	68	3	65	71	140	-69	-73 to -65	0	6	-6	6	9	NA	NA to -44
	12/8/06	HA-6	0-2	160	4	156	164	200	-22	-25 to -20	0	10	-10	10	2	NA	NA to 137
	11/5/07	CP-108	2-4	427	7	420	434	850	-66	-68 to -65	23	5	19	28	6	116	100 to 128
	11/6/07	CP-111	0-2	245	5	240	250	270	-10	-12 to -8	126	4	122	130	85	39	35 to 42
	11/6/07	CP-112	2-4	110	4	106	113	140	-24	-28 to -21	29	3	26	31	34	-18	-28 to -8
	11/6/07	CP-114	0-1.5	38	3	36	41	20	63	56 to 69	13	2	11	15	6	75	61 to 87
	11/6/07	CP-116	0-2	46	3	43	49	54	-16	-22 to -10	8	2	6	10	6	32	5 to 52
	11/6/07	CP-120	10-12	27	2	24	29	6	126	120 to 131	0	5	-5	5	0	NA	NA
	11/6/07	CP-125	0-2	69	3	66	72	58	17	12 to 21	7	2	5	9	4	67	34 to 88

Notes:
RPD = relative percent difference.
data in mg/kg.
+/- = reported accuracy of XRF measurement.

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-01	0-2	7-Dec-06	28	15
	2-4	7-Dec-06	28	8
	4-5	7-Dec-06	22	39
CP-02	0-2	7-Dec-06	52	16
	2-4	7-Dec-06	31	<LOD
CP-03	0-2	7-Dec-06	82	9
	2-4	7-Dec-06	39	20
CP-04	0-2	7-Dec-06	475	21
	2-4	7-Dec-06	140	15
CP-05	0-2	7-Dec-06	865	66
	2-4	7-Dec-06	41	16
CP-06	0-2	7-Dec-06	48	8
	2-4	7-Dec-06	40	<LOD
	4-6	7-Dec-06	480	23
	6-8	7-Dec-06	20	8
	8-10	7-Dec-06	30	<LOD
CP-07	0-2	7-Dec-06	47	<LOD
	2-3.5	7-Dec-06	26	6
CP-08	0-2	7-Dec-06	293	19
	2-4	7-Dec-06	30	18
	4-5	7-Dec-06	43	33
CP-09	0-2	7-Dec-06	1526	138
	2-3.5	7-Dec-06	46	<LOD
CP-10	0-2	7-Dec-06	2634	<LOD
	0-2	7-Dec-06	2102	<LOD
	2-4	7-Dec-06	2451	116
	4-5	7-Dec-06	2391	56
CP-11	0-2	7-Dec-06	69	<LOD
	2-4	7-Dec-06	171	19
	4-6	7-Dec-06	50	33
	6-8	7-Dec-06	29	<LOD
	8-10	7-Dec-06	26	7
CP-12	0-2	7-Dec-06	54	9
	2-4	7-Dec-06	22	<LOD
CP-13	0-2	7-Dec-06	147	16
	2-4	7-Dec-06	42	30
CP-14	0-2	7-Dec-06	93	<LOD
	2-4	7-Dec-06	37	<LOD
CP-15	0-2	7-Dec-06	58	<LOD
	2-4	7-Dec-06	23	<LOD
	4-6	7-Dec-06	26	9
	6-8	7-Dec-06	14	5
	8-10	7-Dec-06	15	8
CP-16	0-2	7-Dec-06	42	20
	0-2	7-Dec-06	43	21
	2-4	7-Dec-06	24	18
CP-17	0-2	7-Dec-06	103	13
	2-4	7-Dec-06	38	34
	4-6	7-Dec-06	28	49
	6-8	7-Dec-06	97	23
	6-6	7-Dec-06	100	21
	8-10	7-Dec-06	10	7
	8-10	7-Dec-06	12	6

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-18	0-2	8-Dec-06	53	15
	2-4	8-Dec-06	87	10
	4-6	8-Dec-06	610	24
	6-8	8-Dec-06	71	12
	8-10	8-Dec-06	25	10
CP-19	0-2	8-Dec-06	58	10
	2-4	8-Dec-06	43	<LOD
	4-6	8-Dec-06	337	58
	6-8	8-Dec-06	485	25
	8-10	8-Dec-06	28	7
CP-20	0-2	8-Dec-06	28	7
	2-4	8-Dec-06	67	<LOD
	4-5.5	8-Dec-06	72	16
CP-21	0-2	8-Dec-06	74	<LOD
	2-4	8-Dec-06	354	38
	4-6	8-Dec-06	50	7
	6-8	8-Dec-06	26	10
	8-10	8-Dec-06	23	12
CP-22	0-2	8-Dec-06	100	10
	2-4	8-Dec-06	218	18
	4-6	8-Dec-06	252	26
	6-8	8-Dec-06	54	11
	8-10	8-Dec-06	29	9
CP-23	0-2	8-Dec-06	44	8
	2-4	8-Dec-06	112	37
	4-6	8-Dec-06	527	30
	6-8	8-Dec-06	107	13
	8-10	8-Dec-06	31	<LOD
CP-24	0-2	8-Dec-06	53	8
	2-4	8-Dec-06	364	25
	4-6	8-Dec-06	708	65
	6-8	8-Dec-06	31	<LOD
	8-10	8-Dec-06	26	6
CP-25	0-2	8-Dec-06	43	10
	2-4	8-Dec-06	115	11
	4-6	8-Dec-06	231	19
	6-8	8-Dec-06	33	<LOD
	8-10	8-Dec-06	28	<LOD
CP-26	0-2	8-Dec-06	28	9
	2-4	8-Dec-06	116	20
	4-6	8-Dec-06	188	14
	6-8	8-Dec-06	68	<LOD
	8-10	8-Dec-06	29	<LOD
CP-101	0-2	5-Nov-07	228	32
	2-4	5-Nov-07	355	<LOD
	4-6	5-Nov-07	65	<LOD
	6-8	5-Nov-07	27	<LOD
	8-10	5-Nov-07	29	<LOD
CP-102	0-2	5-Nov-07	186	14
	2-4	5-Nov-07	22	<LOD
	4-6	5-Nov-07	27	<LOD
	6-8	5-Nov-07	22	6
	8-10	5-Nov-07	11	15

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-103	0-2	5-Nov-07	258	23
	2-4	5-Nov-07	23	7
	4-6	5-Nov-07	15	5
	6-8	5-Nov-07	15	8
	8-10	5-Nov-07	22	5
CP-104	0-2	5-Nov-07	33	<LOD
	2-4	5-Nov-07	24	<LOD
	4-6	5-Nov-07	19	<LOD
	6-8	5-Nov-07	19	<LOD
	8-10	5-Nov-07	18	7
CP-105	0-2	5-Nov-07	20	<LOD
	2-4	5-Nov-07	15	<LOD
	4-6	5-Nov-07	25	5
	6-8	5-Nov-07	25	<LOD
	8-10	5-Nov-07	23	<LOD
CP-106	0-4	5-Nov-07	42	<LOD
	4-6	5-Nov-07	70	7
CP-107	0-2	5-Nov-07	40	8
	2-4	5-Nov-07	24	<LOD
	4-6	5-Nov-07	30	11
	6-8	5-Nov-07	27	<LOD
	8-10	5-Nov-07	22	<LOD
CP-108	0-2	5-Nov-07	17	14
	2-4	5-Nov-07	427	23
	4-6	5-Nov-07	43	9
	6-8	5-Nov-07	24	<LOD
	8-10	6-Nov-07	19	22
CP-109	0-2	6-Nov-07	98	10
	2-4	6-Nov-07	23	<LOD
	4-5	6-Nov-07	24	6
	5-6	6-Nov-07	21	47
CP-110	0-2	6-Nov-07	102	22
CP-111	0-2	6-Nov-07	245	126
	2-4	6-Nov-07	215	47
	4-6	6-Nov-07	142	62
	6-8	6-Nov-07	91	69
CP-112	0-2	6-Nov-07	106	17
	2-4	6-Nov-07	110	29
	4-6	6-Nov-07	84	18
	6-8	6-Nov-07	197	23
	8-10	6-Nov-07	61	23
	10-12	6-Nov-07	26	12
CP-113	0-2	6-Nov-07	34	9
	2-4	6-Nov-07	44	19
	4-6	6-Nov-07	20	7
	6-8	6-Nov-07	21	7
	8-10	6-Nov-07	9	9
	10-12	6-Nov-07	26	7
CP-114	0-1.5	6-Nov-07	38	13
	1.5-3	6-Nov-07	43	<LOD
CP-115	0-1	6-Nov-07	24	11
CP-116	0-2	6-Nov-07	46	8
	2-4	6-Nov-07	31	9
	4-6	6-Nov-07	19	5

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-117	0-2	6-Nov-07	94	<LOD
	2-4	6-Nov-07	31	<LOD
	4-6	6-Nov-07	21	<LOD
	6-8	6-Nov-07	16	7
	8-10	6-Nov-07	23	<LOD
	10-12	6-Nov-07	21	<LOD
CP-118	0-2	6-Nov-07	54	6
	2-4	6-Nov-07	86	25
	4-6	6-Nov-07	21	<LOD
	6-8	6-Nov-07	20	<LOD
	8-10	6-Nov-07	14	<LOD
	10-12	6-Nov-07	15	17
CP-119	0-4	6-Nov-07	44	7
	4-8	6-Nov-07	31	8
	8-10	6-Nov-07	15	15
	10-12	6-Nov-07	26	<LOD
CP-120	0-2	6-Nov-07	172	<LOD
	2-4	6-Nov-07	161	<LOD
	4-6	6-Nov-07	19	6
	6-8	6-Nov-07	23	<LOD
	8-10	6-Nov-07	16	8
	10-12	6-Nov-07	27	<LOD
CP-121	0-2	6-Nov-07	24	<LOD
	2-4	6-Nov-07	21	<LOD
	4-6	6-Nov-07	17	8
	6-8	6-Nov-07	23	<LOD
	8-10	6-Nov-07	25	12
CP-122	0-2	6-Nov-07	34	<LOD
	2-4	6-Nov-07	19	<LOD
	4-6	6-Nov-07	19	6
	6-8	6-Nov-07	26	10
	8-10	6-Nov-07	19	<LOD
	10-12	6-Nov-07	22	<LOD
CP-123	0-4	6-Nov-07	25	<LOD
	4-6	6-Nov-07	22	8
	6-8	6-Nov-07	27	6
	8-10	6-Nov-07	24	<LOD
CP-124	0-4	6-Nov-07	86	10
	4-6	6-Nov-07	57	7
	6-8	6-Nov-07	27	6
	8-11	6-Nov-07	23	7
CP-125	0-2	6-Nov-07	69	7
	2-4	6-Nov-07	20	7
	4-8	6-Nov-07	76	18
	8-10	6-Nov-07	25	6
	10-12	6-Nov-07	20	<LOD
CP-126	0-3	6-Nov-07	33	9
CP-127	0-2	6-Nov-07	26	9
	2-4	6-Nov-07	26	<LOD
HA-01	0-2	13-Dec-06	718	29
HA-02	0-0.25	13-Dec-06	1398	33
HA-03	0-1	13-Dec-06	91	9

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
HA-04	0-2	13-Dec-06	219	13
	2-3	13-Dec-06	22	<LOD
HA-05	0-2	13-Dec-06	95	25
	2-4	13-Dec-06	124	16
HA-06	0-2	13-Dec-06	160	<LOD
	2-4	13-Dec-06	136	<LOD
HA-07	0-0.55	13-Dec-06	174	32
HA-08	0-1.5	13-Dec-06	164	18
HA-09	0-0.5	13-Dec-06	432	<LOD
HA-10	0-2	13-Dec-06	179	32
	2-4	13-Dec-06	272	16
HA-11	0-0.5	13-Dec-06	330	28
B-31	0-2	5-Mar-05	57	7

Notes:

Maximum depth reflects refusal or 10 feet, whichever encountered first.

Shaded = exceeded most stringent standard.

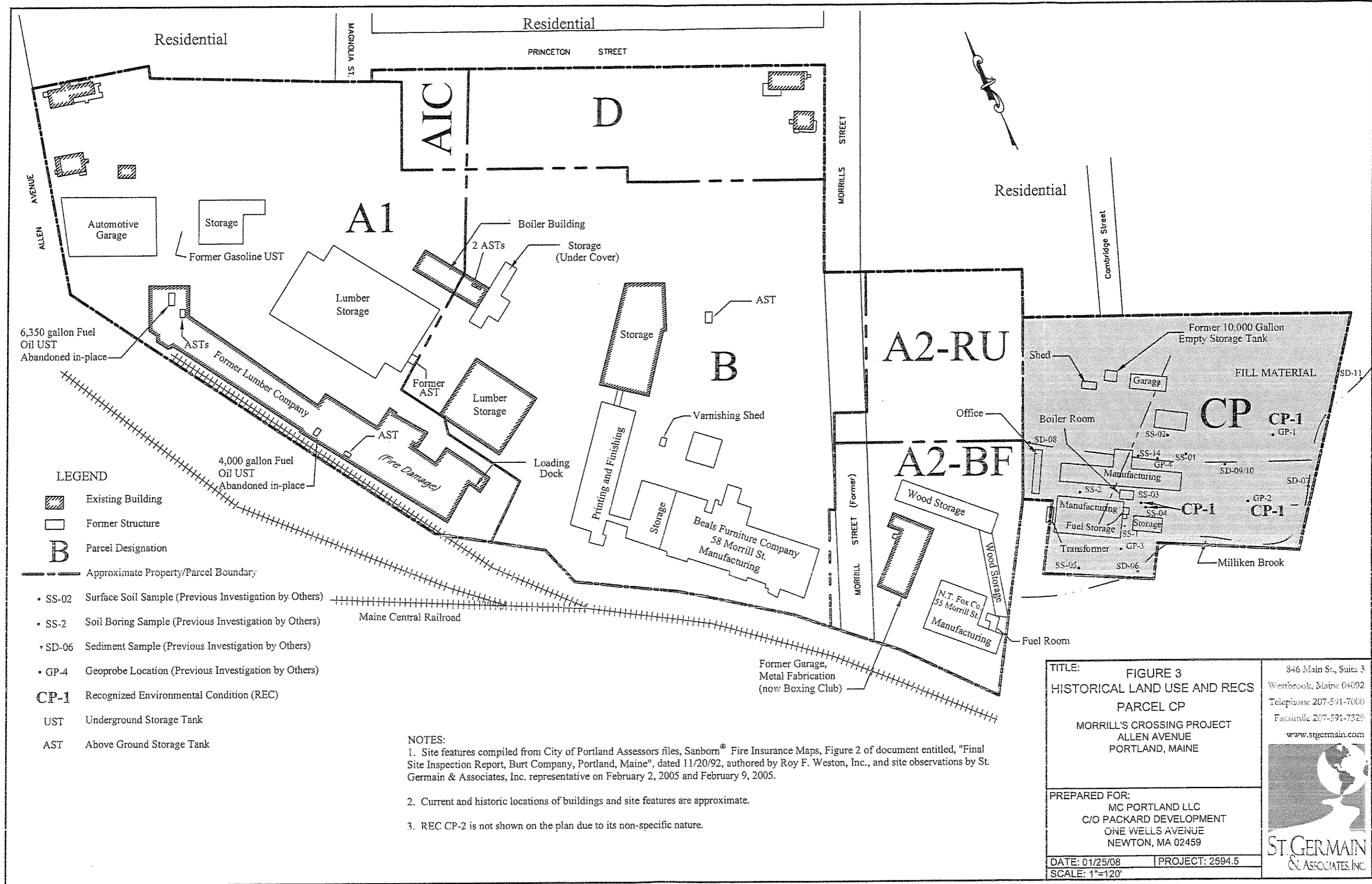
NA = not analyzed

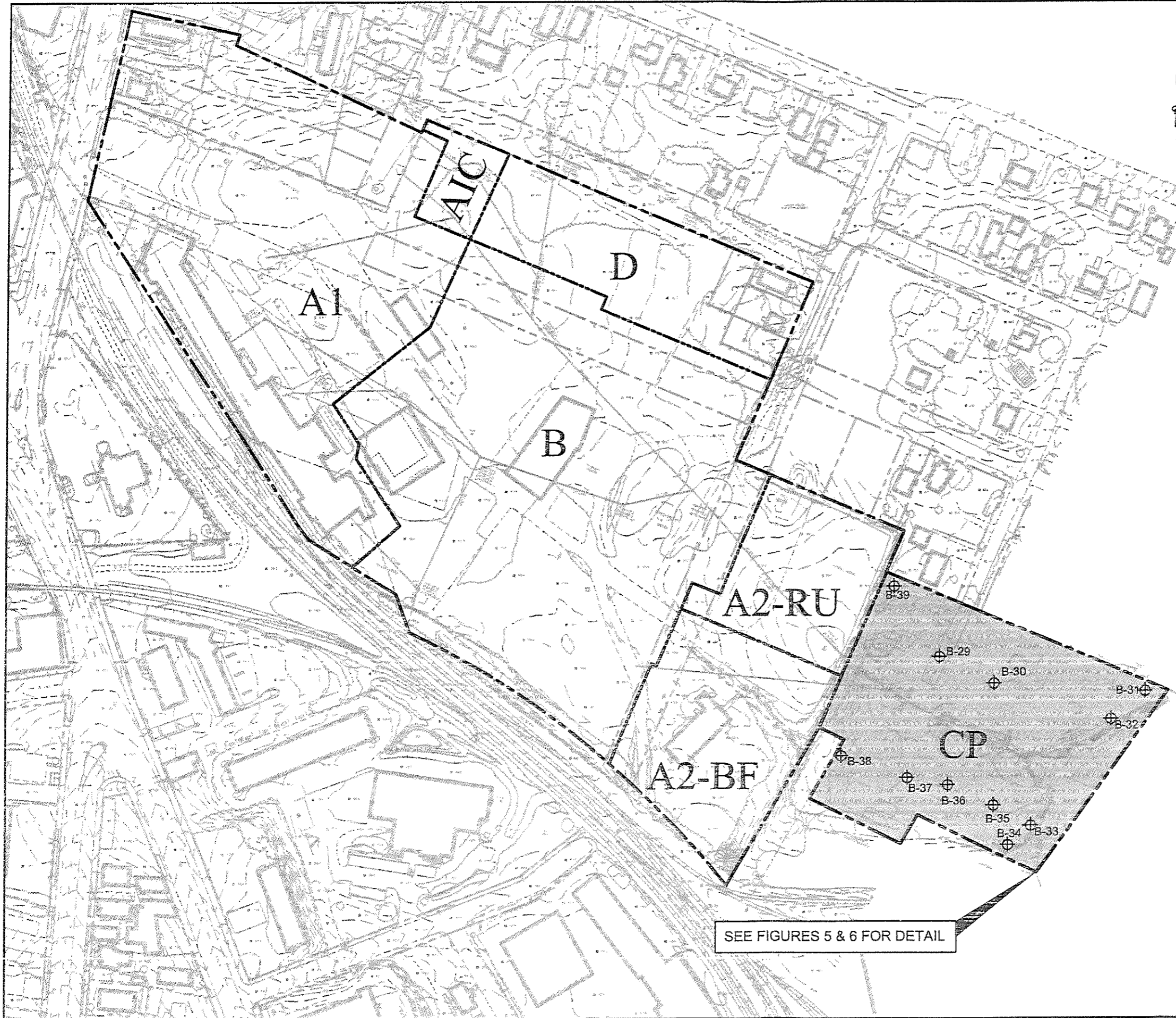
ND = not detected above listed limit

<LOD = below limit of detection of XRF

Laboratory confirmation data for XRF results in Table 3.

See Figure 6 for sample locations.





LEGEND:

- SOIL BORINGS FROM 03/05
- APPROXIMATE PROJECT/PARCEL BOUNDARY
- PARCEL DESIGNATION

NOTES:

- BORING LOCATIONS ARE APPROXIMATE.

REFERENCES:

- BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.

150 0 75 150 300
SCALE IN FEET
1"=150'

TITLE: FIGURE 4
SITE SOIL BORING LOCATIONS
PARCEL CP
MORRILL'S CROSSING PROJECT
ALLEN AVENUE
PORTLAND, MAINE

846 Main St., Suite 3
Westbrook, Maine 04092
Telephone 207-591-7000
Facsimile 207-591-7329
www.stgermain.com

PREPARED FOR:
MC PORTLAND LLC
C/O PACKARD DEVELOPMENT
ONE WELLS AVENUE
NEWTON, MA 02459

DATE: 01/25/08 **PROJECT:** 2594.5
SCALE: 1"=150'



SEE FIGURES 5 & 6 FOR DETAIL

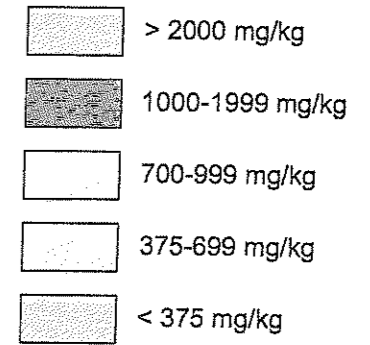


LEGEND:

● (21) SURFACE SOIL SAMPLE LOCATION WITH LEAD CONCENTRATION IN mg/kg

--- APPROXIMATE PROJECT/PARCEL BOUNDARY

INTERPOLATED LEAD CONCENTRATIONS

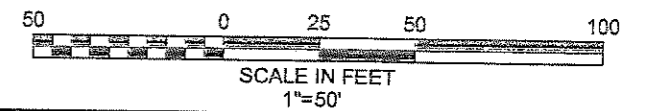


NOTES:

1. SEE REPORT FOR CONTOURING METHODOLOGY.

REFERENCES:

1. BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.



TITLE:

FIGURE 5
2005 CP PARCEL
SURFACE SOIL
LEAD SAMPLING PLAN

MORRILL'S CROSSING PROJECT
 ALLEN AVENUE
 PORTLAND, MAINE

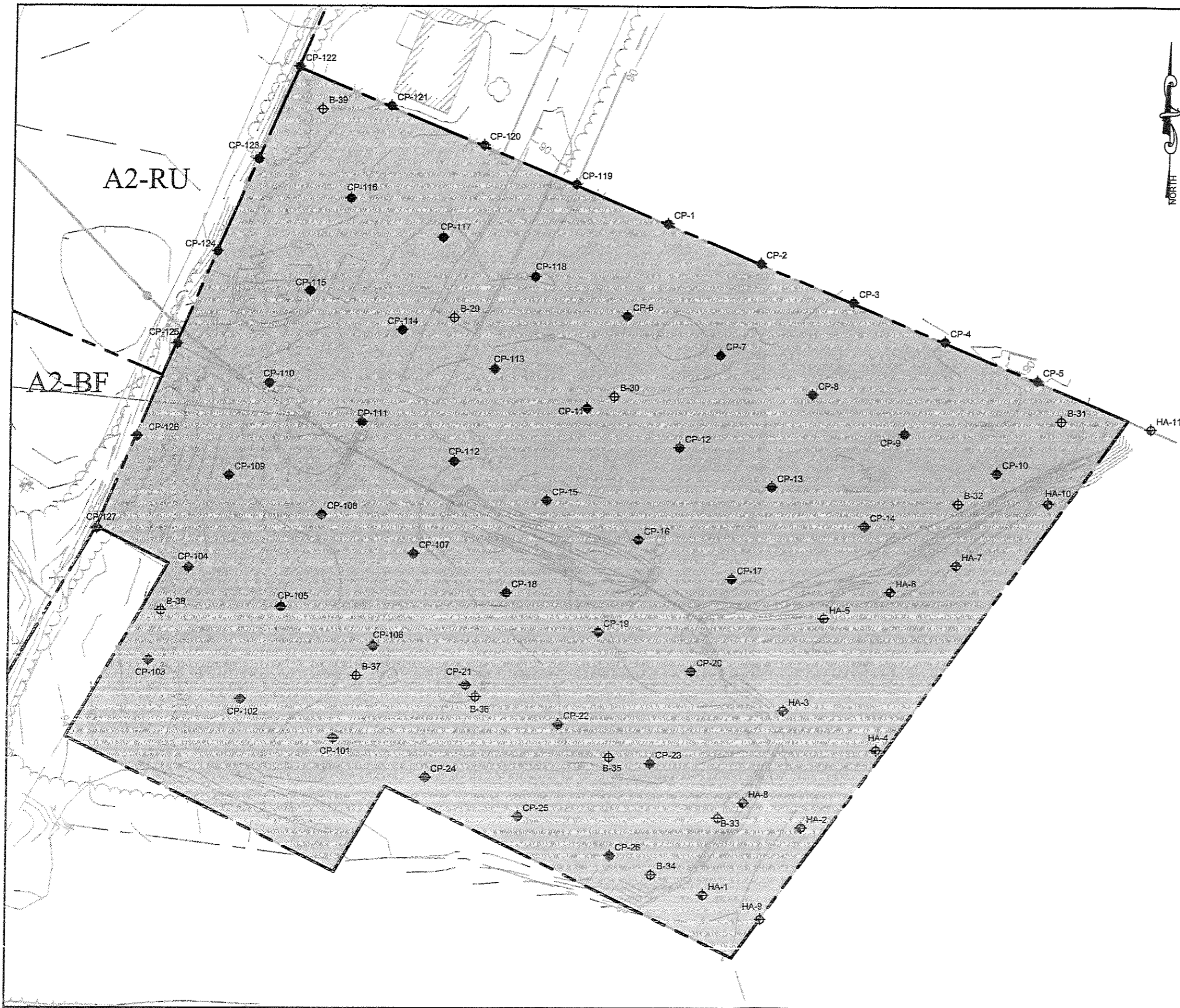
846 Main St., Suite 3
 Westbrook, Maine 04092
 Telephone 207-591-7000
 Facsimile 207-591-7329
 www.stgermain.com

PREPARED FOR:

MC PORTLAND LLC
 C/O PACKARD DEVELOPMENT
 ONE WELLS AVENUE
 NEWTON, MA 02459



DATE: 01/25/08 **PROJECT:** 2594.5
SCALE: 1"=50'

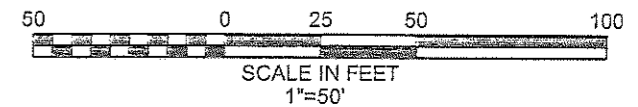


LEGEND:

- B- SOIL BORINGS FROM 03/05
- CP- BORINGS FROM 12/06 AND 11/07
- HA- HAND AUGER LOCATIONS FROM 12/06
- APPROXIMATE PROJECT/
PARCEL BOUNDARY

REFERENCES:

1. BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.



TITLE: FIGURE 6
2006/2007 CP PARCEL
LEAD AND ARSENIC SOIL
BORING LOCATIONS

MORRILL'S CROSSING PROJECT
ALLEN AVENUE
PORTLAND, MAINE

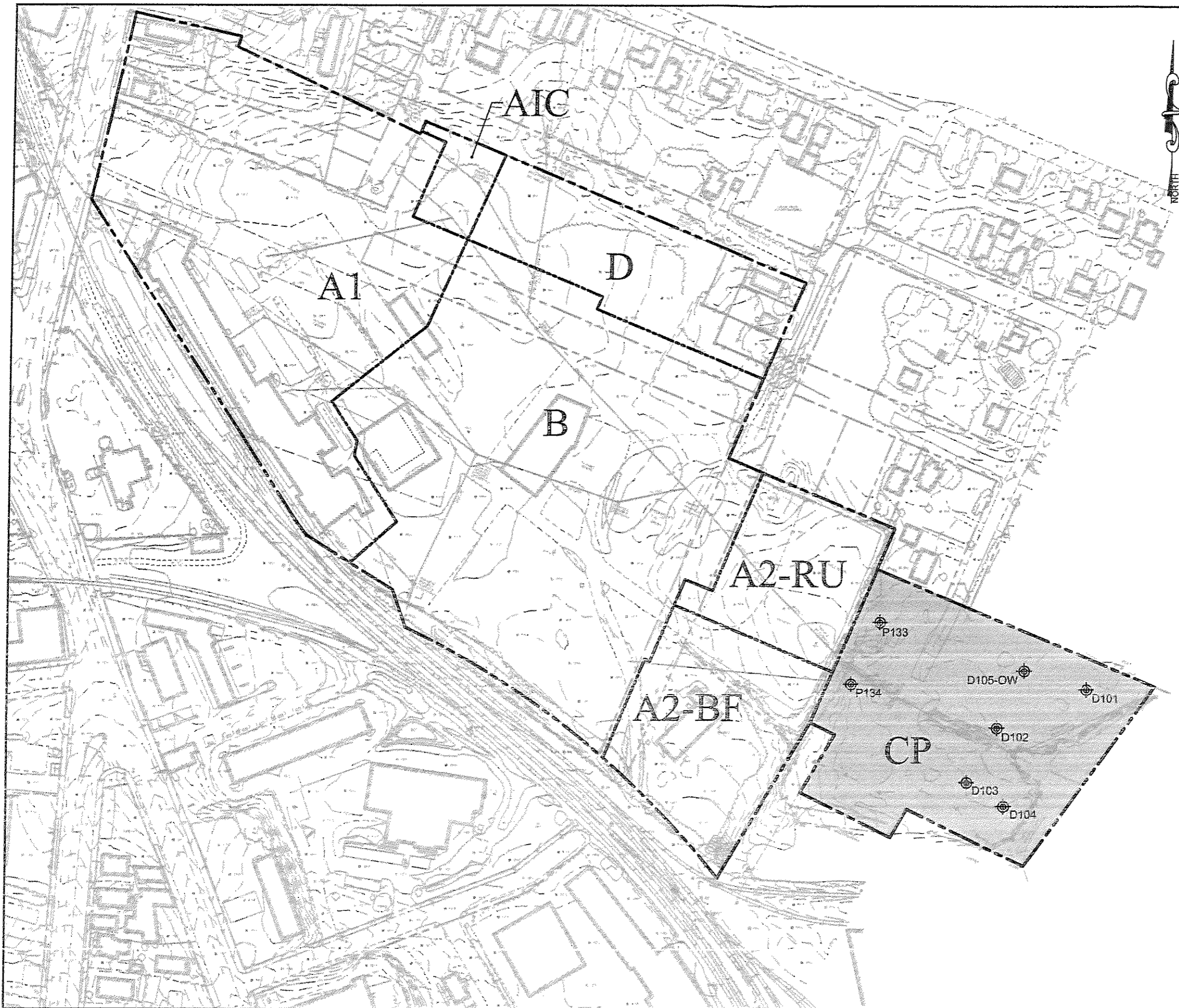
846 Main St., Suite 3
Westbrook, Maine 04092
Telephone 207-591-7000
Facsimile 207-591-7329
www.stgermain.com






PREPARED FOR:
MC PORTLAND LLC
C/O PACKARD DEVELOPMENT
ONE WELLS AVENUE
NEWTON, MA 02459

DATE: 01/25/08 **PROJECT:** 2594.5
SCALE: 1"=50'

M:\Dwgs\2594 VHB Morrill's Corner Development\dwg\Site Invest Report\PAR CPI2594 FIG7.dwg Jan 25, 2008 - 7:55am Plotted by: DBURGESS



LEGEND:

-  TEST BORING LOCATION, COMPLETED BY R.W. GILLESPIE & ASSOCIATES, INC., 10/06, 12/06
-  PROBE BORING LOCATION, COMPLETED BY R.W. GILLESPIE & ASSOCIATES, INC., 10/06
-  APPROXIMATE PROJECT/PARCEL BOUNDARY
- B** PARCEL DESIGNATION

REFERENCES:

1. BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.
2. FIGURE 2 PRELIMINARY EXPLORATION LOCATION PLAN, FIELD EXPLORATION REPORT, BY R.W. GILLESPIE & ASSOCIATES, INC., DATED 12/06.

150 0 75 150 300
 SCALE IN FEET
 1"=150'

TITLE:

FIGURE 7
 R.W. GILLESPIE
 GEOTECHNICAL
 BORING LOCATIONS
 PARCEL CP
 MORRILL'S CROSSING PROJECT
 ALLEN AVENUE
 PORTLAND, MAINE

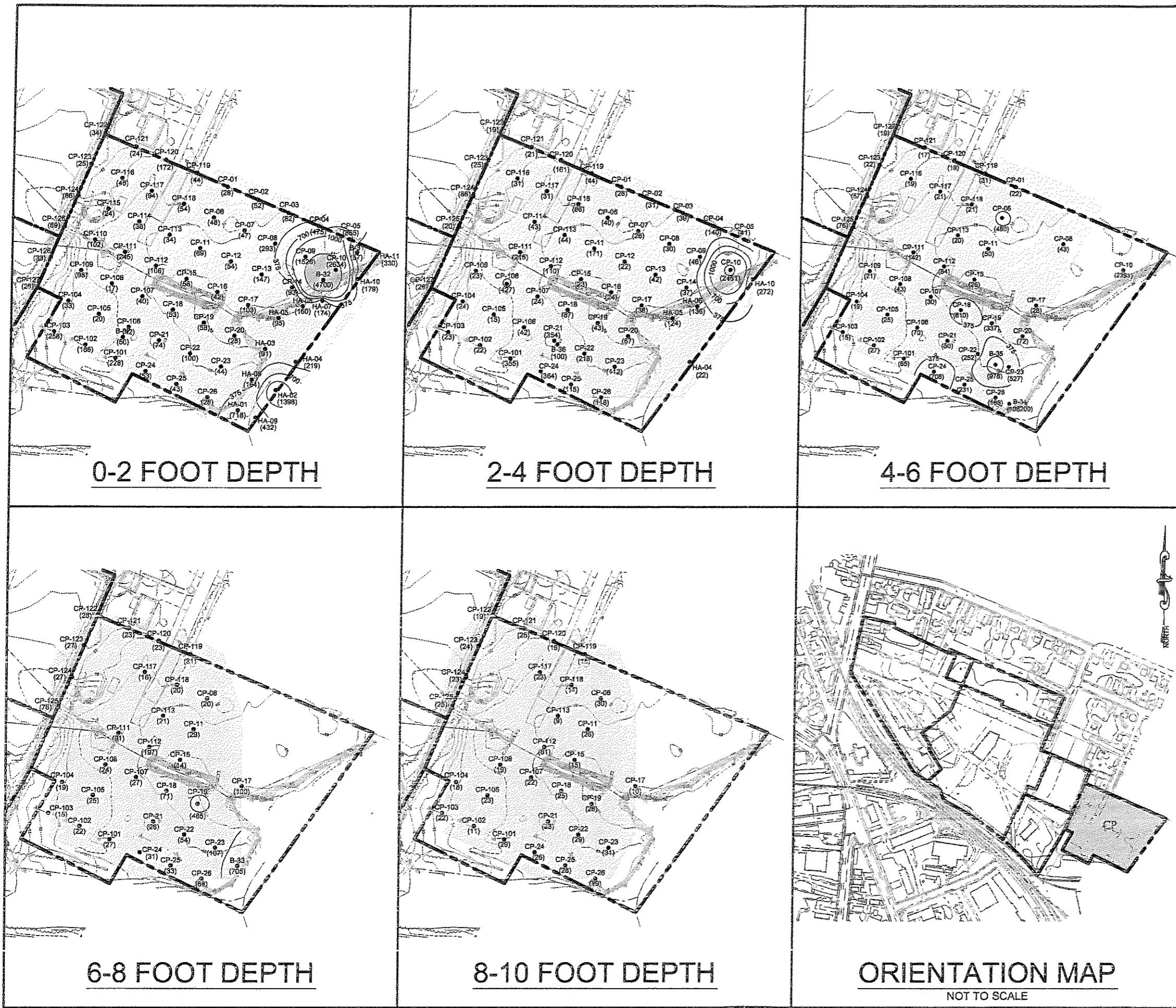
846 Main St., Suite 3
 Westbrook, Maine 04092
 Telephone 207-591-7000
 Facsimile 207-591-7329
 www.stgermain.com

PREPARED FOR:

MC PORTLAND LLC
 C/O PACKARD DEVELOPMENT
 ONE WELLS AVENUE
 NEWTON, MA 02459

DATE: 01/25/08 **PROJECT:** 2594.5
SCALE: 1"=150'





LEGEND:

- SOIL SAMPLE LOCATION WITH LEAD CONCENTRATION IN mg/kg
- APPROXIMATE PROJECT/PARCEL BOUNDARY

INTERPOLATED LEAD CONCENTRATIONS

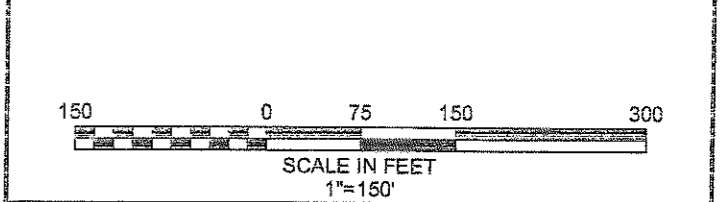
	> 2000 mg/kg
	1000-1999 mg/kg
	700-999 mg/kg
	375-699 mg/kg
	< 375 mg/kg

NOTES:

- SEE REPORT FOR DISCUSSIONS OF CONTOURING.

REFERENCES:

- BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.



TITLE: **FIGURE 8**
2006/2007 CP PARCEL
SUBSURFACE SOIL
LEAD CONCENTRATIONS

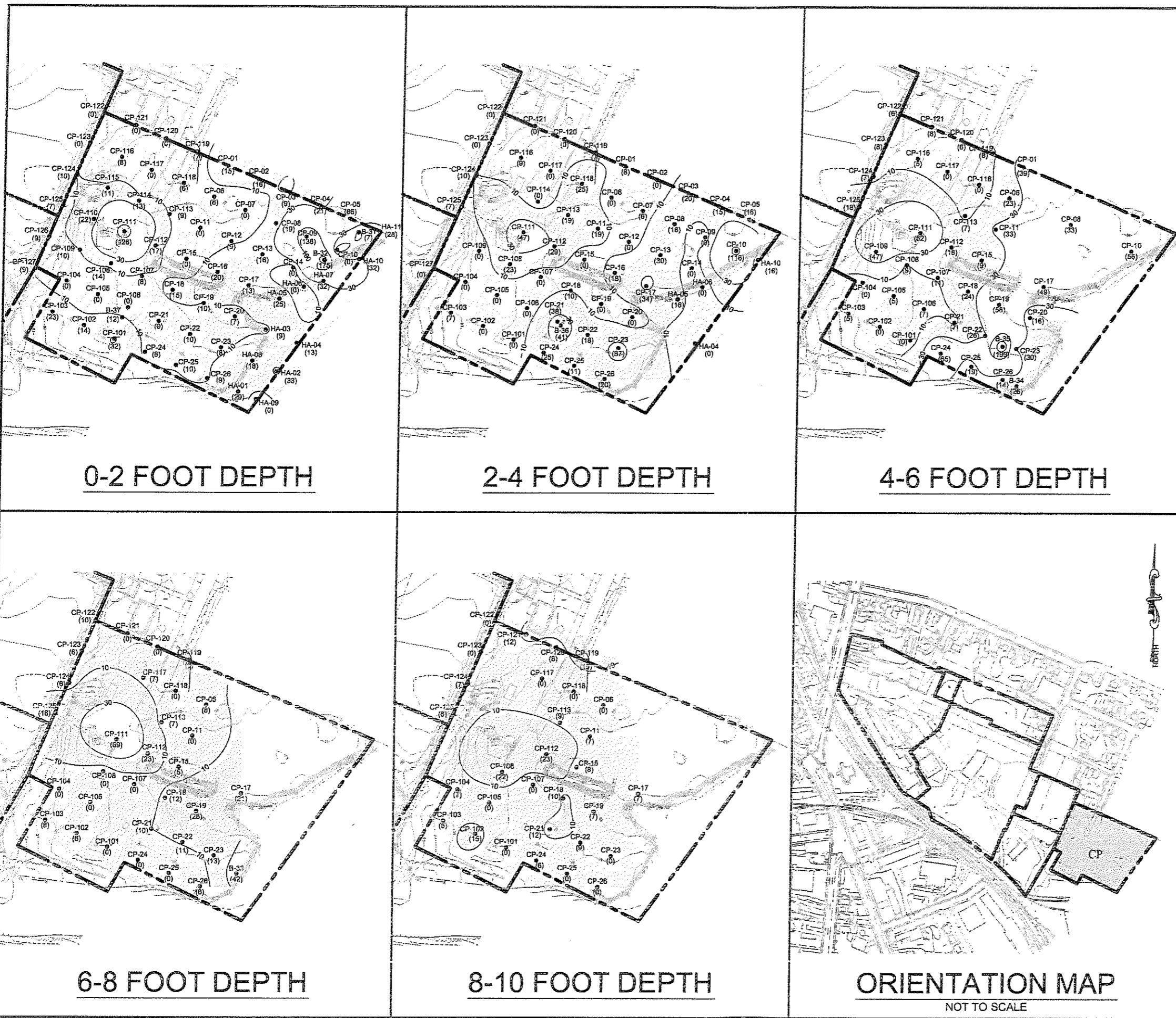
MORRILL'S CROSSING PROJECT
 ALLEN AVENUE
 PORTLAND, MAINE

846 Main St., Suite 3
 Westbrook, Maine 04092
 Telephone 207-591-7000
 Facsimile 207-591-7529
 www.stgermain.com

PREPARED FOR:
 MC PORTLAND LLC
 C/O PACKARD DEVELOPMENT
 ONE WELLS AVENUE
 NEWTON, MA 02459

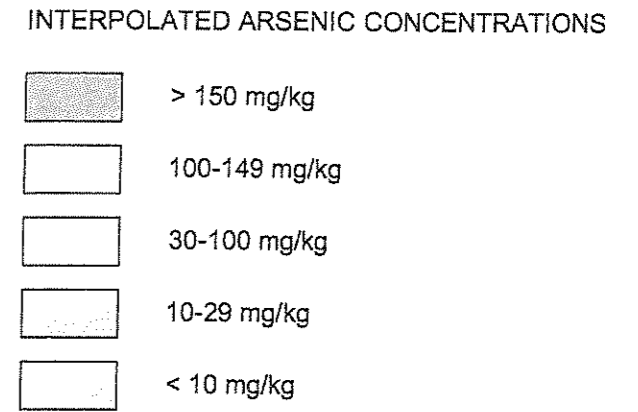
DATE: 01/25/08 **PROJECT:** 2594.5
SCALE: 1"=150'

ST GERMAIN
 & ASSOCIATES, INC.



LEGEND:

- SOIL SAMPLE LOCATION WITH ARSENIC CONCENTRATION IN mg/kg
- APPROXIMATE PROJECT/PARCEL BOUNDARY

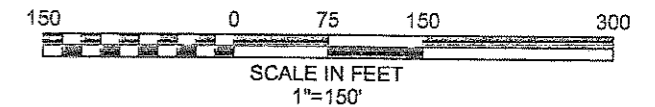


NOTES:

- SEE REPORT FOR DISCUSSIONS OF CONTOURING.

REFERENCES:

- BASE PLANS FOR MORRILL'S CROSSING PROJECT BY VANASSE HANGEN BRUSTLIN, INC. DATED 07/01/05.



TITLE: **FIGURE 9**
2006/2007 CP PARCEL
SUBSURFACE SOIL ARSENIC
CONCENTRATIONS

MORRILL'S CROSSING PROJECT
 ALLEN AVENUE
 PORTLAND, MAINE

846 Main St., Suite 3
 Westbrook, Maine 04092
 Telephone 207-591-7000
 Facsimile 207-591-7329
 www.stgermain.com

PREPARED FOR:
 MC PORTLAND LLC
 C/O PACKARD DEVELOPMENT
 ONE WELLS AVENUE
 NEWTON, MA 02459

DATE: 01/25/08 PROJECT: 2594.5
 SCALE: 1"=150'





STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 4, 2008

MC Portland, LLC
Mr. Paul Cincotta, Vice President
c/o Packard Development
One Wells Avenue
Newton, MA 02459

RE: Parcel CP, Morrills Crossing, Cornell Street, Portland Maine
Voluntary Response Action Program No Action Assurance Letter

Dear Mr. Cincotta:

The Maine Department of Environmental Protection's ("Department's") Voluntary Response Action Program ("VRAP") has received MC Portland, LLC ("MC Portland") application for Parcel CP Morrills Crossing, located on Allen Avenue in Portland, Maine ("Parcel CP"). The application was submitted with the request that the Site participate in the VRAP, and that MC Portland LLC, as an applicant to the VRAP, receive the protections provided by the VRAP law. Submitted to the Department as part of the VRAP application was a Site Investigation Report, prepared by St. Germain & Associates, Inc. ("St. Germain"). This report outlines the history of the Site and environmental conditions of Parcel CP. Also included in the VRAP submittal was a cover letter which outlined proposed remedial actions for the property that are to occur prior to and during the redevelopment of Parcel CP.

Based on the information presented in the Report, the Department concurs with the proposed remedial actions and procedures as outlined in the cover letter to the VRAP Application. As stated in the Site Investigation Report, the Site's previous use consisted of a billiard ball and poker chip manufacturer. Historic environmental site assessments have identified lead and arsenic impacts in soil. To further assess the actual impact of historic land use to Parcel CP, several phases of test borings have been conducted by St. Germain. Areas of the eastern portion of Parcel CP were identified with lead and arsenic levels in soil exceeding Department Remedial Action Guidelines ("RAGs") for residential or adult worker standards were identified. No petroleum impacted soil above the appropriate remedial standard was identified.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

Parcel CP exhibits characteristics which would qualify it as a “Baseline-2” level petroleum remediation, as enumerated in the Department’s “Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Ground Water in Maine”. A Baseline-2 remediation requires the removal of free-product petroleum in groundwater and the removal/remediation of petroleum saturated soils, as well as the removal/ remediation of petroleum contaminated soils with greater than 500-1000 parts per million (“ppm”) of gasoline range organics (“GRO”) and/or greater than 200-400 ppm of diesel range organics (“DRO”), as measured using the Department’s field headspace method. A target clean up goal of 400 ppm is appropriate for any encountered petroleum impacted soils. If contamination extends below the groundwater table, the VRAP staff will be contacted to determine the need to remove contaminated soil below the groundwater table.

The Cover Letter with the VRAP application outlines the conceptual plan for addressing environmental contamination at Parcel CP. A more complete remediation plan will be submitted to VRAP for approval at least two weeks prior to initiation of redevelopment activities. As outlined in the cover letter, soil impacted with elevated lead and arsenic will remain on-Site but will be isolated using engineering and institutional controls. Parcel CP has two distinct redevelopment plans: the eastern portion of the Site will be used for stormwater detention ponds, the western portion will be occupied by a recreation field and associated parking. For the detention pond areas, post – redevelopment surfaces with lead and/or arsenic concentrations above the Adult Worker/Trespasser RAG will be buried under 12 inches of vegetated fill or covered with rip rap. Soil with arsenic and lead concentrations below the Adult Worker/Trespasser RAGs will be used for construction of the ponds without restriction but covered with rip rap or vegetated. The Ponds will then be fenced. Soil at the proposed recreation field with lead or arsenic concentrations above the Residential RAG, as well as excess lead/arsenic impacted soil generated from the detention pond construction, will be buried beneath the field under 12 inches of vegetated fill, building foundations, or asphalt pavement upon completion of redevelopment. Soil requiring isolation may be temporarily stockpiled on the Property before being replaced. Upon completion and approval of site redevelopment activities, an Environmental Covenant with appropriate activity and use limitations will be recorded. It is possible that contaminated soil or other waste material may be encountered that is not currently known about. If such material is encountered, VRAP will be notified as outlined in the cover letter.

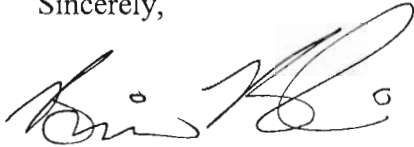
Provided that the remedial actions are completed to the satisfaction of the Department, MC Portland LLC, and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at Cornell Street, identified as Lot 13, Block A, on Portland Tax Map 151A, as listed in Book 8279 on Page 185 of the Cumberland County Registry of Deeds. The Department will take no action against MC Portland LLC and those persons identified in 38 M.R.S.A. §343-E(6).

All remedial measures completed at Parcel CP will be documented in a Site Remediation Report and forwarded to the VRAP, as described in the Cover Letter. Upon determining

successful conclusion of the remedial tasks, the Department will issue to MC Portland LLC a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please call me at 207-287-4858.

Sincerely,



Brian Beneski, VRAP Project Manager
Division of Remediation
Bureau of Remediation and Waste Management

CC: Keith Taylor, St. Germain & Associates Inc.
Natalie L. Burns, ESQ, Jensen Baird Gardner & Henry
Nick Hodgkins, MEDEP
Bill Bullard, MEDEP



PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Former Burt Company Parcel
1 Cambridge Street
Portland, Maine 04103**

Prepared for

The City of Portland
389 Congress Street
Portland, Maine 04101

July 20, 2015

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

Former Burt Company Parcel 1 Cambridge Street Portland, Maine

1.0 Executive Summary

Sebago Technics, Inc. (STI) was retained by The City of Portland, to conduct a Phase I Environmental Site Assessment (ESA) of the former Burt Company property located at 1 Cambridge Street, identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database. This work was done in conformance with ASTM Standard Practice E 1527-13.

The subject site consists of a generally square shaped parcel with the listed address of 1 Cambridge Street and is identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database (see Figure 2-Site Sketch). The site contains is currently vacant, having been the former location of the Burt Company billiard ball and poker chip manufacturing company. The property is located at the southern terminus of Cambridge Street, between residential development to the north, mainly industrial and warehousing to the south, commercial and retail development to the west, and a large storage warehouse immediately to the east of the property.

The general characteristics of the site and vicinity are urban, densely developed property in a mix of residential and industrial developed portion of the City. The subject site lies to the northwest of the Rocky Hill industrial area and former quarry. The subject site, and land to the northwest appears to be vacant former industrial/commercial properties with a number of vacant buildings and parking lots. The site is located within the C-36 conditionally commercially zoned district of Portland. The area surrounding the property is used for a mix of residential, industrial, and commercial purposes within the Read Street and Quarry Road corridor.

The current use of the property is vacant and undeveloped. The property is mainly secure with fencing, but is accessible by transients. Exterior portions of the property are currently impacted by sporadic solid waste dumping, which was observed in two areas of the site within the drainage ditch bisecting the center of the site.

Site improvements observed include perimeter fencing, a man-made drainage ditch containing culverted crossings which bisects the site, riprap areas on some perimeter drainage areas, and remnants of paved and gravel surface areas remaining from the former Burt Company operations. A utility pole containing overhead utility wires located on the western side of the parcel extends utilities to utility poles within Cambridge Street. Previous site improvements associated with the former Burt Company operations on site include two main operations buildings, an office building, garages, storage trailers, and areas of concrete storage pads contains accessed by paved and gravel access driveways. These structures were removed by demolition in 1999. The site has remained vacant since.

Central Maine Power (CMP) Company provides electrical power to the site. Potable water is provided by the Portland Water District and sanitary sewerage for the site is supplied by City of Portland Sanitary District.

Solid waste was observed dumped on exterior portions of the subject site. Waste such as tires, appliances, construction debris, wood waste, clothes and assorted household waste was observed dumped in the drainage channel bisecting the property. This dumping would be considered a de minimis condition, and other than unsightly, is not expected to significantly impact the subject site.

No areas of petroleum impacted soils and/or stressed vegetation was observed on the exterior portions of the site. No storage tanks were observed on the exterior portion of the property. No polychlorinated biphenyl (PCB) containing equipment was observed on exterior portions of the site. No areas of significant fill or excavation were observed.

Environmental Data Resources (EDR) identified numerous leaking underground/aboveground storage tank (LUST/LAST) sites within the American Society for Testing and Materials (ASTM) ½-mile radius of the subject site. STI identified three sites within the closest proximity and/or cross-gradient or upgradient to the subject site, as properties involving a LUST/LAST. In STI's opinion, based on the distance and direction of the LUST sites, the availability of potable drinking water, and completion of remediation or lack of contamination at the properties, the EDR LUST/LAST sites are not considered RECs to the subject property.

The subject site (Burt Company) is listed with the Maine Department of Environmental Protection (MDEP) as a State Hazardous Waste Site (SHWS), leaking aboveground storage tank (LAST) site, and is listed as a Federal Brownfields site. STI reviewed extensive files within the Maine Department of Environmental Protection's file room database of pertinent environmental information. The property's remaining contamination issues existing on the site are associated with elevated lead and arsenic levels remaining within soils on portions of the site. This site was the subject of environmental investigations beginning in the early 1990's and most recently in 2008 as part of a Voluntary Response Action Program (VRAP) application to the MDEP for potential redevelopment of the site for detention ponds for a proposed shopping center, and portions of the site redeveloped as an athletic field. MDEP approved redevelopment plans at the time of the 2008 application, provided contaminated soils were placed under cover systems, or removed from the site altogether. Additional documents reviewed at MDEP for this assessment indicate "That the current site management of this project is sufficient to ensure that public health and/or the environment are properly protected". STI contacted the current MDEP site representative concerning the current status of the site, whom confirmed the site has been characterized, however no remediation has been completed. While the current contamination on the site documented in these investigations appears to remain on site, and in its current condition do not pose an immediate threat to health and human safety, the documented lead and arsenic soil contamination on the property represents a recognized environmental condition (REC) on the subject site.

EDR identified four State voluntary clean up (VCP) sites within the required ½ mile radius of the subject site. Each of these properties participated in the VRAP through the MDEP. With the exception of the Morrill's Crossing property, records reviewed at MDEP indicate each of these properties designated as in "No Further Action" status following enrollment and remediation completed in conjunction with VRAP participation. Based on the "No Further Action" status and the distance of these properties from the subject site, these sites do not represent a REC to the subject property. Similar to the subject site, the Morrill's Crossing properties are listed as a currently in "remediation stage", noting remediation was needed, but not initiated. These properties are located to the northeast of the subject site, and were the subject of significant potential redevelopment proposed in 2008, which was terminated with site remediation never

conducted. Based on the subject site's extensive previous environmental investigations, it does not appear any off site contamination associated with the Morrill's Crossing properties have impacted the subject site.

STI has performed a Tier I Vapor Encroachment Screening for the subject site in general conformance with the scope of work and limitations of ASTM Standard E2600-10. In general conformance with practice ASTM Standard E2600-10, the AOC did not contain instances of reported spills within the defined distances for known or suspect free-product/LNAPL petroleum contamination.

STI has performed a Phase I ESA of the former Burt Company property located at 1 Cambridge Street, identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database. The documented presence of lead and arsenic contaminated soils on portions of the property allowed to remain in place in their current condition represents a REC on the subject site.

2.0 Introduction

STI was retained by The City of Portland, to conduct a Phase I ESA of the former Burt Company property located at 1 Cambridge Street, identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database (hereinafter “subject site”; see Figure 2, Site Sketch). This work was done in conformance with ASTM Standard Practice E 1527-13.

2.1 Purpose

The purpose of this Phase I ESA is to identify “recognized environmental conditions” (RECs), “controlled recognized environmental conditions” (CRECs), and “historical recognized environmental conditions” (HRECs) as defined in ASTM Standard Practice E 1527-13. In addition, this ESA intends to identify environmental issues, which may be present in quantities and under conditions that may lead to contamination of the property (i.e., business environmental risk) although items listed in Section 13 are not included.

A REC is defined in ASTM Standard Practice E 1527-13 as “the presence or likely presence of any hazardous substances (i.e., as defined under Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA]) or petroleum products in, on, or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment”.

A CREC is defined in ASTM Standard Practice E 1527-13 as “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls”.

A HREC is defined in ASTM Standard Practice E 1527-13 as “a past release of hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls”.

The ASTM definition of REC does not include “de minimis” conditions, which generally do not present risk or harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. Therefore, de minimis conditions are not considered RECs.

A “business environmental risk” is defined in ASTM Standard Practice E 1527-13 as “a risk which can have a material environmental or environmentally-driven financial impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.”

2.2 Scope of Work

In performing the scope of work (SOW) for the Phase I ESA, STI performed the following activities:

- *Records Review:* Federal and State databases were reviewed by utilizing a database search provided by Environmental Data Resource, Inc. (FIRSTSEARCH) of Milford Connecticut. The FIRSTSEARCH report included information compiled from, but not limited to, the following federal databases:

National Priority List (NPL); Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS); Resource Conservation and Recovery Information System (RCRIS) Transportation, Storage, and Disposal (TSD); RCRIS Generator; Emergency Response Notification System (ERNS); State databases included: landfills; registered underground storage tanks (USTs); hazardous waste sites; and Maine Department of Environmental Protection (MDEP) State Spills Sites, which STI cross checks with leaking underground storage tank (LUST) sites, MDEP Bureau of Waste Management Hazardous & Oil Spill System Online Report Service, and City of Portland Fire Department file review. In addition, a historical records review included aerial photographs and historical topographic maps.
- *Site Reconnaissance:* STI conducted a site inspection to determine current conditions related to the following issues: oil and/or hazardous materials (OHM) storage and handling; USTs and aboveground storage tanks (ASTs); spills and/or dumping of OHM; and PCB-containing equipment.
- *Vapor Migration Screening:* When applicable, STI conducted vapor migration screening for this assessment in general conformance with ASTM Standard Practice E 2600-10, Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions.
- *Interviews:* Interviews/interactions with individuals who have specialized knowledge of past and present uses of the site and future intended uses, including the building owner.
- *Report:* Documentation of findings, opinions, and conclusions in accordance with Appendix 4 of ASTM Standard Practice E 1527-13.

2.3 Assumptions

- Groundwater flow on the subject site is assumed to be parallel to the topographical gradient.

2.4 Limitations, Exceptions, and Additions

Limitations to the ASTM E 1527-13 SOW included:

- Adjoining property research was limited to those properties directly abutting the subject site, and historical information for the adjoining properties was

limited to the information revealed during research conducted on the subject site.

- No assessment of non-scope considerations (i.e., ACBM, Biological agents, Radon, Lead-Based Paint, Lead in drinking water, wetlands, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality unrelated to releases of hazardous substances or petroleum products into the environment, and Mold) is required for appropriate inquiry as defined by this practice and not included as part of this assessment.

Exceptions to the ASTM E 1527-13 SOW included:

- There were no exceptions to the ASTM E 1527-13 SOW.

Additional work conducted outside the ASTM E 1527-13 SOW included:

- No additional work was conducted outside the ASTM E 1527-13 SOW.

2.5 Special Terms and Conditions

The Terms and Conditions associated with this assessment are described in the agreement between The City of Portland and STI by contract dated June 17, 2015.

2.6 Reliance

This assessment has been performed for the exclusive use of The City of Portland. This entity is considered the “user” of this report, seeking to use ASTM Practice E1527-13 to complete an ESA of the property. This assessment may not be relied upon by any other person or entity without the expressed written consent of STI and The City of Portland. The conclusions are based on the SOW described herein and referenced sources. The conclusions are limited by the SOW performed and the conditions at the subject site. No other warranty, expressed or implied, is indicated.

3.0 Site Description

3.1 Location and Legal Description

The subject site consists of a generally square shaped parcel with the listed address of 1 Cambridge Street and is identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database. The site is currently vacant, having been the former location of the Burt Company billiard ball and poker chip manufacturing company. The property is located at the southern terminus of Cambridge Street, between residential development to the north, mainly industrial and warehousing to the south, commercial and retail development to the west, and a large storage warehouse immediately to the east of the property.

The City of Portland Assessor Office on-line database indicates that the parcel is owned by the City of Portland. A copy of the property assessment record for the subject site, as obtained by STI, is provided Appendix D, Historical Research Documents. A legal description of the property was not provided by the client for this assessment.

3.2 Site and Vicinity General Characteristics

The subject site is currently vacant. The site was occupied by buildings until 1999 when the buildings were removed and the property was secured with fencing to prevent further vandalizing of the abandoned buildings by transients. The majority of the site has regained vegetative growth yet still contains some surface areas of old pavement and gravel. The site is located on the southwest corner of a residential city block, bounded by residences along Cambridge Street to the north, and commercial and industrial properties to the south, east, and west.

The general characteristics of the site and vicinity are urban, densely developed property in a mix of residential and industrial developed portion of the City. The subject site lies to the northwest of the Rocky Hill industrial area and former quarry. The subject site, and land to the northwest appears to be vacant former industrial/commercial properties with a number of vacant buildings and parking lots. The site is located within the C-36 conditionally commercially zoned district of Portland. The area surrounding the property is used for a mix of residential, industrial, and commercial purposes within the Read Street and Quarry Road corridor. Information on the abutting properties is detailed in Section 3.5.

3.3 Current Use of the Property

The current use of the property is vacant and undeveloped. The property is mainly secure with fencing, but is accessible by transients. Exterior portions of the property are currently impacted by sporadic solid waste dumping, which was observed in two areas of the site within the drainage ditch bisecting the center of the site.

3.4 Description of Site Improvements

Site improvements observed include perimeter fencing, a man-made drainage ditch containing culverted crossings which bisects the site, riprap areas on some perimeter drainage areas, and remnants of paved and gravel surface areas remaining from the former Burt Company operations. A utility pole containing overhead utility wires located on the western side of the parcel extends utilities to utility poles within Cambridge Street.

Previous site improvements associated with the former Burt Company operations on site include two main operations buildings, an office building, garages, storage trailers, and areas of concrete storage pads contains accessed by paved and gravel access driveways. These structures were removed by demolition in 1999. The site has remained vacant since.

3.5 Current Uses of Adjoining Properties

The land in the vicinity of the site is developed for commercial, industrial and residential purposes. The property is bordered by the following structures and developments:

North: The site is bordered directly to the north by the right-of-way for Cambridge Street, which intersects with Cornell Avenue. Residential development extends north from the subject site.

South: Directly to the south are number of warehouses adjacent to Read Street and Quarry Road, including Cuddledown and Rocky Hill 1 & Rocky Hill 2 storage warehouses. Abandoned rail lines area located between the subject site and these properties.

East: The site is bordered directly to the east by the large storage building for Rocky Hill 1 & Rocky Hill 2, which are shipping and receiving facilities. Additional residential development extending from University Street is also located to the east, northeast of the site.

West: The site is bordered to the west by more vacant properties extending to Morrill's Corner, including vacant paved parking lots and a former metal manufacturing facility. Further west is the right-of-way for Forest Avenue, containing a mix of commercial and retail development.

4.0 User Provided Information

In accordance with the ASTM 1527-13 SOW, STI provided a User Questionnaire to the user (The City of Portland). Gregory Mitchell, Economic Development Director, City of Portland, completed the questionnaire and a summary of the information obtained is provided below. A copy of the completed User Questionnaire is provided in Appendix C, Interview Documents.

4.1 Title Records

Records reviewed at the City of Portland online Assessor's database indicate the current owner of the subject site is the City of Portland. Title records for the subject site were not provided by the user for this assessment.

4.2 Environmental Liens/Use Limitations

The user indicated an "unknown" response to environmental liens or activity use limitations in place on the site.

4.3 Specialized Knowledge

The user reported no specialized knowledge of RECs or other potential environmental concerns in connection with the property.

4.4 Commonly Known or Reasonably Ascertainable Information

The user indicated a "yes" response to commonly known or reasonably ascertainable information about the property that would be indicative of releases or threatened releases.

4.5 Valuation Reduction for Environmental Issues

The user indicated a "no" response to purchase price being paid for the property reasonably reflecting the fair market value of the property.

4.6 Owner, Property Manager, and Occupant Information

STI provided an environmental questionnaire to the current owner of the property, and the user provided access to the property. The property is currently unoccupied and vacant, owned by the City of Portland.

4.7 Reason for Performing Phase I Assessment

It is the understanding of STI that the City of Portland is exploring the potential sale/swap of this property. The primary reason for performing this Phase I ESA of the property is to perform environmental due diligence prior to the transfer of this property.

5.0 Records Review

5.1 Standard Environmental Record Sources

Environmental Data Resources (EDR) provided regulatory information for the subject site and surrounding properties using a database search. All unplottable (orphan) sites identified with an address were researched by STI and are included below as appropriate. Information pertaining to the identified sites is provided in the EDR Report and is included as Appendix B. In addition, definitions to the abbreviations listed below are provided in the EDR Report. The EDR database search included, but was not limited to, the following ASTM E 1527-13 required sites and radii:

- | | |
|--|---|
| • NPL (1 mile) | No sites identified. |
| • CERCLIS (1/2 mile) | No sites identified. |
| • RCRA CORRACTS (1 mile) | No sites identified. |
| • RCRA TSD (1/2 mile) | No sites identified. |
| • RCRA Generator (subject site and abutters) | No sites identified. |
| • ERNS (subject site only) | No sites identified. |
| • State Sites (CERCLIS equiv., 1 mile) | Two sites identified and discussed below. |
| • Landfills (1/2 mile) | No sites identified. |
| • LUST (1/2 mile) | Three sites identified and discussed below. |
| • UST (site and abutters) | No sites identified. |
| • State Voluntary Cleanup Program (VCP) Sites (1/2 mile) | Four sites identified and discussed below. |
| • State Spill Sites (site and abutters) | No sites identified. |

5.1.1 *State Sites/CERCLIS Sites*

Two State Sites were identified within the required 1-mile search radius of the subject site. The subject site (Burt Company) and the Merrill Transport Company site were identified by EDR as State and/or CERCLIS Sites.

The subject site (Burt Company) is listed with the USEPA as a State Hazardous Waste Site (SHWS), leaking aboveground storage tank (LAST) site, and is listed as a Federal Brownfields site. STI reviewed extensive files within the Maine Department of Environmental Protection's file room database of pertinent environmental information. The property's remaining contamination issues existing on the site are associated with elevated lead and arsenic levels remaining within soils on portions of the site. This site was the subject of environmental investigations beginning in the early 1990's and most recently in 2008 as part of a Voluntary Response Action Program (VRAP) application to the MDEP for potential redevelopment of the site for detention ponds for a proposed shopping center, and portions of the site redeveloped as an athletic field. MDEP approved redevelopment plans at the time of the 2008

application, provided contaminated soils were placed under cover systems, or removed from the site altogether. Additional documents reviewed at MDEP for this assessment indicate “That the current site management of this project is sufficient to ensure that public health and/or the environment are properly protected”. STI contacted the current MDEP site representative concerning the current status of the site, whom confirmed the site has been characterized, however no remediation has been completed. While the current contamination on the site documented in these investigations appears to remain on site, and in its current condition do not pose an immediate threat to health and human safety, the documented lead and arsenic soil contamination on the property represents a REC on the subject site. Copies of pertinent historical environmental reports and correspondence regarding the former Burt Company site are provided in Appendix E-Burt Company Environmental Documents.

The Merrill Transport Company, located at 1037 Forest Avenue and 1/3-mile to the southwest of the site, was also identified as a SHWS in the MDEP database. This site has undergone extensive remediation associated with a former unlined holding pit. The site has received a “No Further Action” status from the MDEP, however the site still requires periodic sampling per a consent order on the property. Based on the distance and direction of this property from the subject site (1/3-mile), completion of remediation, and “No Further Action” decision in conjunction with MDEP oversight, this site does not represent a REC to the subject property.

5.1.2 LUST Sites

EDR identified numerous LUST sites within the American Society for Testing and Materials (ASTM) ½-mile radius of the subject site. STI identified the following three sites within the closest proximity and/or cross-gradient or upgradient to the subject site, as properties involving a LUST/LAST.

Site	Location	Distance/Direction from Site (miles)	Status
The Burt Company	Subject Site	N/A	No Further Action (NFA)-1-2 Gallon AST Overfill Within Building. No Exterior Discharge.
M.L. Brewer Fine Woodworking	91 Bell Street	905' SSW	Contamination w/ UST Removal. Remediated Thorough VRAP. NFA
Morrill Street Associates	91 Bell Street	905' SSW	NFA-UST Abandoned in Place. No

Site	Location	Distance/Direction from Site (miles)	Status
			Contamination Observed

In STI’s opinion, based on the distance and direction of the LUST sites, the availability of potable drinking water, and completion of remediation or lack of contamination at the properties, the EDR LUST/LAST sites are not considered RECs to the subject property. Copies of the Maine Department of Environmental Protection (MDEP) spill reports containing specific details for each of these LUST sites are included in Appendix F-MDEP Spill Reports.

Additionally, EDR identified numerous LUST/LAST sites within the ½-mile ASTM required reporting radius, that were investigated by STI and determined to have no impact to the subject site. These sites were associated with tank spills, releases or overfills, that were minor in nature and/or downgradient of the property. These sites are not connected hydrologically to the subject site and do not pose an environmental threat to the subject site.

5.1.3 State Voluntary Cleanup Program (VCP) Sites

EDR identified four State VCP sites within the required ½ mile radius of the subject site:

- Merrill Transport Company, Inc. - 1037 Forest Avenue
- Fill It Up Please - 1185 Forest Avenue
- Morrills Crossing (5 Parcels) - Morrill Street & Cornell Street
- Holden Company -75 Bishop Street

Each of these properties participated in the VRAP through the MDEP. With the exception of the Morrill’s Crossing property, records reviewed at MDEP indicate each of these properties designated as in “No Further Action” status following enrollment and remediation completed in conjunction with VRAP participation. Based on the “No Further Action” status and the distance of these properties from the subject site, these sites do not represent a REC to the subject property.

Similar to the subject site, the Morrill’s Crossing properties are listed as currently in “remediation stage”, noting remediation was needed, but not initiated. These properties are located to the northeast of the subject site, and were the subject of significant potential redevelopment proposed in 2008, which was terminated with site remediation never conducted. Based on the subject site’s extensive previous environmental investigations, it does not appear any off site contamination associated with the Morrill’s Crossing properties have impacted the subject site.

5.2 Additional Environmental Record Sources

City of Portland Assessor, Code Enforcement Office and Fire Department Records. STI reviewed records at the City of Portland Assessor's and Code Enforcement Offices (CEO). Assessor and CEO files provided STI with historical information, including property appraisal forms and tax maps, concerning past development at the subject site, as well as information regarding the site's former use as the Burt Company manufacturing operations.

STI visited the Portland Fire Department to review records concerning the subject site. Pertinent environmental records observed within the Portland Fire Department files reviewed for the property include the documentation of fires occurring at the site in 1989 and 1990. The Portland fire department notified the MDEP of potential hazardous waste remaining in the vacant buildings on the property at that time. This waste was removed prior to the razing of the buildings in 1998.

File reviews were also conducted at the City of Portland Code Enforcement and Assessor's offices. Assessing record reviewed indicated the historical occupation of the site as commercial (Burt Company). Historical code enforcement files indicate the subject site's structure was razed in 1998, as well as various previous building permits associated with the former manufacturing company. No other pertinent environmental information was observed in the files reviewed for this assessment at the city that STI had not already obtained from our MDEP review.

5.3 Physical Setting Sources

Topography. Review of site topography on the Portland West 7.5-Minute Quadrangle map indicates the following:

- The site has an average elevation of approximately 100 feet above mean sea level, and is located to the southeast of the intersection of Morrill's Corner in an area depicted as Deering Junction on the USGS topographic map in Portland.
- The nearest surface water feature is a portion of Milliken Brook, which is not depicted on the topographic map. A small unnamed pond located to the east of the site, across Canco Road less than 1/2-mile from the site. Back Cove, a portion of Casco Bay is located approximately one mile to the southeast of the subject site. No significant natural features are located on the subject site.
- The topography of the site and surrounding area is relatively flat. The site is depicted on the USGS map as clear of vegetation and developed with structures, with the site located in an urban developed portion of Portland (1974 Map). The site is located within a densely populated portion of Portland, identified as the Deering Junction section of the City.

A copy of the topographic map is provided as Figure 1, Site Location Map in the Figures portion of this report.

Flood: According to information provided on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for Portland, Maine, Community Panel No. 230051-0007C, the subject site is not located in a Flood Plain.

Soils/Geology:

Bedrock: The bedrock geology of the site is mapped as the Silurian-Ordovician Hutchins Corner Formation. This rock consists of bluish to purplish-gray, biotite-quartz-plagioclase granofels with thin interbeds of greenish-gray calc-silicate granofels. This rock may contain minor phyllitic schist layers. Bedding and foliation planes strike generally N50E with 40-degree southeast dip.

Surficial: The surficial geology underlying the site is mapped as the Presumpscot Formation consisting of thick massive clay-silts with some interlayered fine sand lenses.

Soils: According to the U. S. Department of Agriculture's (USDA's) Cumberland County Soil Survey (CCSS), the soil underlying the site is classified as Buxton Silt Loam. The Buxton series consists of very deep, moderately well drained soils that formed in glaciolacustrine or glaciomarine deposits on coastal lowlands and river valleys. Slope ranges from 3 to 50 percent. Permeability is moderate or moderately slow in the surface horizon, moderately slow or slow in the upper part of the subsoil, and slow or very slow in the lower part of the subsoil and in the substratum. Mean annual temperature is about 45 degrees F, and mean annual precipitation is about 44 inches at the type location.

Groundwater Hydrology: According to MGS Significant Sand & Gravel Aquifers Map No. 99-11, the subject site is not located on a significant sand and gravel aquifer. Based on local and regional topography and surface drainage, groundwater appears to follow the topography and move generally in a southeasterly direction towards Back Cove.

5.4 Historical Use Information on the Property

Records reviewed at the City of Portland's Assessing offices indicate that the subject site is owned by the City of Portland. The City obtained the property through tax purposes in 1998. The property appears to have been originally developed in 1895 as a manufacturing facility for billiard balls, and eventually poker chips, with operations continuing at the property until 1988, when the property was sold to R.F. Investment Trust, at which time manufacturing operations ceased at the property.

Following the ceasing of manufacturing operations at the site's facility, it appears the property and structures remained vacant, apparently with numerous manufacturing equipment and materials allowed to remain on site, unprotected and unsecured allowing for site-wide vandalism, and two eventual fires in 1989 and 1990. As a result of the fires, and the observed condition of the property, the City of Portland Fire Department notified the Maine DEP informing them of the remaining hazardous materials at the property. Subsequent environmental investigations on the property revealed remaining containers of hazardous waste, as well as lead and barium concentrations detected in

soils at the site. The site was then officially designated a “State Uncontrolled Hazardous Substances Site”.

With the site in an “uncontrolled” status, the Maine DEP conducted a cleanup of the remaining materials on the property and buildings with additional testing between 1991 and 1992. No additional site investigations and/or remediation was conducted at the site until 1998, when Maine DEP conducted a Brownfield Site Assessment of the property. This assessment revealed two remaining areas of contamination including elevated lead and arsenic levels in soils on a portion of the property. At that time the buildings were also razed by the City of Portland.

This site was the subject of an environmental investigation most recently in 2008 as part of a Voluntary Response Action Program (VRAP) application to the MDEP for potential redevelopment of the site for detention ponds for a proposed shopping center, and portions of the site redeveloped as an athletic field. Additional site investigations confirmed the elevated concentrations of lead and arsenic in soils on portions of the property. MDEP approved redevelopment plans at the time of the 2008 application, however provided contaminated soils were placed under cover systems, or removed from the site altogether.

Practically reviewable and reasonably ascertainable resources reviewed for this assessment reveal the earliest reviewable records obtained for the subject site include the 1954, 1971, 1980, 1988 Sanborn Fire Insurance Maps. The 1954 earliest Sanborn Fire Insurance Map in the vicinity of the subject site depicts the subject site as the original Burt Company manufacturing facility, consistent with historical records reviewed for this assessment.

Aerial photographs for the years 1956, 1960, 1970, 1975, 1987, 1992, 1997, 2003, 2006 and 2007 were reviewed from EDR’s historical aerial photo collection. The photographs prior to 2003 indicate the subject site as the location of the Burt Company’s facility layout. Photographs after 1997 show the site similar to its existing condition. The surrounding vicinity was observed to be previous developed in most photos.

The Burt Company’s historical location on the subject and documented presence of remaining soil contamination represents a CREC on the property.

6.0 Vapor Encroachment Screening

6.1 Purpose

We have performed a Tier I Vapor Encroachment Screening for the subject site in general conformance with the scope of work and limitations of ASTM Standard E2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. The purpose of the Vapor Encroachment Screening (VES) is to identify existing or potential *vapor encroachment conditions* (VECs) affecting the subject site. A VEC is defined as “the presence or likely presence of volatile or toxic vapors in the subsurface of the target property caused by the release of vapors from contaminated soil or groundwater either on or near the target property”.

6.2 Methodology

ASTM Standard E2600-10 establishes an Area of Concern (AOC) for known or potentially contaminated properties, which is defined as 1/10-mile from the subject site for sites with known or suspect dissolved petroleum contamination, and 1/3-mile from the subject site for sites with known or suspect free-product/LNAPL petroleum contamination and all other sites with known or suspect contamination with respect to the range of contaminants within the scope of CERCLA. STI identified all surrounding properties within the AOC and applies professional judgement to minimize the AOC using information such as groundwater flow direction and hydrological interpretations. These sites identified within the minimized AOC were evaluated with respect to chemicals of concern, depth to groundwater, soil conditions, soil gas conduits, remedial status, AULs, and other pertinent information to determine whether a VEC exists, likely exists, cannot be ruled out, or can be ruled out because a VEC does not exist or is not likely to exist.

6.3 Findings

In general conformance with practice ASTM Standard E2600-10, the AOC did not contain instances of reported spills within the defined distances for known or suspect free-product/LNAPL petroleum contamination.

7.0 Site Reconnaissance

7.1 Methodology and Limiting Conditions

Site reconnaissance of the subject site was performed during a site visit conducted on June 24, 2015.

7.2 General Site Setting

The general site setting consists of the vacant subject site which contains recent tree growth following years of industrial activity removed from the site in 1999. The site was occupied by buildings and trailers until 1999 when the buildings were removed and the property was secured with fencing to prevent further vandalizing of the abandoned buildings by transients. The majority of the site has regained vegetative growth yet still contains some surface areas of old pavement and gravel. The site is located on the southwest corner of a residential city block, bounded by residences along Cambridge Street to the north, and commercial and industrial properties to the south, east, and west.

7.3 Exterior Observations

- *Utilities.* CMP Company provides electrical power to the site. Potable water is provided by the Portland Water District and sanitary sewerage for the site is supplied by City of Portland Sanitary District.
- *Surficial Staining.* No areas of petroleum impacted soils and/or stressed vegetation was observed on the exterior portions of the site.
- *Storage Tanks.* No storage tanks were observed on the exterior portion of the property.
- *PCB Containing Equipment.* No PCB containing equipment was observed on exterior portions of the site.
- *Solid Waste.* Solid waste was observed dumped on exterior portions of the subject site. Waste such as tires, appliances, construction debris, wood waste, clothes and assorted household waste was observed dumped in the drainage channel bisecting the property. This dumping would be considered a de minimis condition, and other than unsightly, is not expected to impact the subject site.
- *Areas of Fill/Excavations.* No areas of significant fill or excavation were observed.

7.4 Interior Observations

Due to the undeveloped nature of the property, no interior observations were conducted on the subject site.

8.0 Interviews

Interviews conducted as part of this assessment include completion of an “All Appropriate Inquiry” User Questionnaire in accordance with the ASTM 1527-13 SOW and a standard environmental questionnaire by Gregory Mitchell, Economic Development Director, City of Portland, ME. The environmental questionnaire is provided in Appendix C of this assessment. Interviews were also conducted with representatives from the MDEP regarding the current status of the site.

9.0 Data Gaps

Based on information gathered as part of this assessment and STI's professional experience, data gaps raising reasonable concerns affecting STI's ability to identify RECs were not identified.

10.0 Findings

Based on the information gathered from activities associated with the SOW for this Phase I ESA, STI makes the following findings and opinions for the subject site:

- The subject site consists of a generally square shaped parcel with the listed address of 1 Cambridge Street and is identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database. The site contains is currently vacant, having been the former location of the Burt Company billiard ball and poker chip manufacturing company. The property is located at the southern terminus of Cambridge Street, between residential development to the north, mainly industrial and warehousing to the south, commercial and retail development to the west, and a large storage warehouse immediately to the east of the property.
- The general characteristics of the site and vicinity are urban, densely developed property in a mix of residential and industrial developed portion of the City. The subject site lies to the northwest of the Rocky Hill industrial area and former quarry. The subject site, and land to the northwest appears to be vacant former industrial/commercial properties with a number of vacant buildings and parking lots. The site is located within the C-36 conditionally commercially zoned district of Portland. The area surrounding the property is used for a mix of residential, industrial, and commercial purposes within the Read Street and Quarry Road corridor.
- The current use of the property is vacant and undeveloped. The property is mainly secure with fencing, but is accessible by transients. Exterior portions of the property are currently impacted by sporadic solid waste dumping, which was observed in two areas of the site within the drainage ditch bisecting the center of the site.
- Site improvements observed include perimeter fencing, a man-made drainage ditch containing culverted crossings which bisects the site, riprap areas on some perimeter drainage areas, and remnants of paved and gravel surface areas remaining from the former Burt Company operations. A utility pole containing overhead utility wires located on the western side of the parcel extends utilities to utility poles within Cambridge Street. Previous site improvements associated with the former Burt Company operations on site include two main operations buildings, an office building, garages, storage trailers, and areas of concrete storage pads contains accessed by paved and gravel access driveways. These structures were removed by demolition in 1999. The site has remained vacant since.
- CMP Company provides electrical power to the site. Potable water is provided by the Portland Water District and sanitary sewerage for the site is supplied by City of Portland Sanitary District.
- Solid waste was observed dumped on exterior portions of the subject site. Waste such as tires, appliances, construction debris, wood waste, clothes and assorted household waste was observed dumped in the drainage channel bisecting the property. This dumping would be considered a de minimis condition, and other than unsightly, is not expected to impact the subject site.
- No areas of petroleum impacted soils and/or stressed vegetation was observed on the exterior portions of the site. No storage tanks were observed on the exterior portion of

the property. No PCB containing equipment was observed on exterior portions of the site. No areas of significant fill or excavation were observed.

- EDR identified numerous LUST sites within the American Society for Testing and Materials (ASTM) ½-mile radius of the subject site. STI identified three sites within the closest proximity and/or cross-gradient or upgradient to the subject site, as properties involving a LUST/LAST. In STI's opinion, based on the distance and direction of the LUST sites, the availability of potable drinking water, and completion of remediation or lack of contamination at the properties, the EDR LUST/LAST sites are not considered RECs to the subject property.
- The subject site (Burt Company) is listed with the USEPA as a State Hazardous Waste Site (SHWS), leaking aboveground storage tank (LAST) site, and is listed as a Federal Brownfields site. STI reviewed extensive files within the Maine Department of Environmental Protection's file room database of pertinent environmental information. The property's remaining contamination issues existing on the site are associated with elevated lead and arsenic levels remaining within soils on portions of the site. This site was the subject of environmental investigations beginning in the early 1990's and most recently in 2008 as part of a Voluntary Response Action Program (VRAP) application to the MDEP for potential redevelopment of the site for detention ponds for a proposed shopping center, and portions of the site redeveloped as an athletic field. MDEP approved redevelopment plans at the time of the 2008 application, provided contaminated soils were placed under cover systems, or removed from the site altogether. Additional documents reviewed at MDEP for this assessment indicate "That the current site management of this project is sufficient to ensure that public health and/or the environment are properly protected". STI contacted the current MDEP site representative concerning the current status of the site, whom confirmed the site has been characterized, however no remediation has been completed. While the current contamination on the site documented in these investigations appears to remain on site, and in its current condition do not pose an immediate threat to health and human safety, the documented lead and arsenic soil contamination on the property represents a REC on the subject site.
- EDR identified four State VCP sites within the required ½ mile radius of the subject site. Each of these properties participated in the VRAP through the MDEP. With the exception of the Morrill's Crossing property, records reviewed at MDEP indicate each of these properties designated as in "No Further Action" status following enrollment and remediation completed in conjunction with VRAP participation. Based on the "No Further Action" status and the distance of these properties from the subject site, these sites do not represent a REC to the subject property. Similar to the subject site, the Morrill's Crossing properties are listed as a currently in "remediation stage", noting remediation was needed, but not initiated. These properties are located to the northeast of the subject site, and were the subject of significant potential redevelopment proposed in 2008, which was terminated with site remediation never conducted. Based on the subject site's extensive previous environmental investigations, it does not appear any off site contamination associated with the Morrill's Crossing properties have impacted the subject site.
- STI has performed a Tier I Vapor Encroachment Screening for the subject site in general conformance with the scope of work and limitations of ASTM Standard E2600-10. In

general conformance with practice ASTM Standard E2600-10, the AOC did not contain instances of reported spills within the defined distances for known or suspect free-product/LNAPL petroleum contamination.

11.0 Opinion

The well documented environmental characterization of the property identifying elevated concentrations of lead and arsenic on portions of the property represents a REC on the subject site. Additionally, limited solid waste dumping was observed on the property as a result of unobstructed access to the site. No significant surficial staining was observed on exterior portions of the site. Consistent with recommendations in previous environmental investigations and conclusions on the subject site, in STI's opinion, should the site be redeveloped, interested parties should enroll the site in the Maine DEP's VRAP to mitigate the site's existing contamination. Depending on future site redevelopment, remediation may be limited to mitigating subsurface contaminated soils with cover systems such as pavement, concrete or fill at a depth limiting exposure to the contaminants. Discussions with MDEP indicate the subject site's existing contaminants in their present condition do not pose an immediate threat to human health and safety, and have been allowed to remain in place. The property should improve restrictions on access to deter further dumping or potential exposure to any remaining subsurface contaminants on the property.

12.0 Conclusions

STI has performed a Phase I ESA of the former Burt Company property located at 1 Cambridge Street, identified as Lot 13, Block A, on Tax Map 151A in the City of Portland Assessors database. This work was done in conformance with ASTM Standard Practice E 1527-13. Any exceptions to or deletions from this practice are described in Section 2.4 of this report.

The documented presence of lead and arsenic contaminated soils on portions of the property allowed to remain in place in their current condition represents a REC on the subject site.

Solid waste was observed dumped on exterior portions of the subject site. Waste such as tires, appliances, construction debris, wood waste, clothes and assorted household waste was observed dumped in the drainage channel bisecting the property. This dumping would be considered a de minimis condition, and other than unsightly, is not expected to impact the subject site.

13.0 Deviations

There have been no deviations or deletions from the ASTM Standard E 1527-13 practice in conducting this study and developing this report.

14.0 Additional Services

The following are non-scope considerations in the conduct of a Phase I ESA under ASTM Standard E 1527-13:

- Asbestos Containing Materials (ACM)
- Radon
- Lead Based Paint
- Lead in Drinking Water
- Wetlands
- Regulatory Compliance
- Cultural and Historic Resources
- Industrial Hygiene
- Health and Safety
- Ecological Resources
- Endangered species
- Indoor Air Quality
- Biological Agents
- Mold

15.0 References

City of Portland Assessors' Office, subject site ownership, map and parcel, zoning information, <http://www.portlandassessors.com>, June 22, 2015.

City of Portland Fire Department, underground storage tank and spill incidences file, June 22, 2015.

Environmental Data Resources, Historical Aerial Photographs, 1956, 1960, 1970, 1975, 1987, 1992, 1997, 2003, 2006 and 2007, June 18, 2015.

Environmental Data Resources, Federal and State Regulatory Review Information, June 18, 2015.

Federal Emergency Management Agency, City of Portland Flood Map No. 230051-0007C, 2015.

Hussey, A.M., II, 2003, *Bedrock Geology of the Portland West Quadrangle*, Maine Geol. Survey Open-file Report 03-94. Map at scale 1:24,000.

Maine Department of Environmental Protection (MDEP), *Brownfield Site Assessment Report Burt Company-Portland Maine*, February 24, 1999.

Maine Department of Environmental Protection (MDEP), Bureau of Waste Management, Augusta File Review, June 25, 2015.

Maine Department of Environmental Protection (MDEP), Bureau of Waste Management, Hazardous & Oil Spill System on-line report system <http://www.maine.gov/dep/rwm/hoss/>, June 26, 2015.

Sanborn Fire Insurance Maps, 1954, 1971, 1980, and 1988.

Subject site reconnaissance, June 17 & 26, 2015.

St. Germain & Associates, *Site Investigation Report Parcel CP Morrill's Crossing Project, Allen Avenue, Portland, Maine*, January 25, 2008

Thompson, W.B., 1997, *The Surficial Geology of the Portland West Quadrangle, Maine*. Geol. Survey Open-file Report 97-51. Map at scale 1:24,000

United States Geological Survey, Portland West, Maine, Quadrangle, 1891, 1957, Photo - revised 1978.

User Questionnaire completed by Gregory Mitchell, Economic Development Director, City of Portland, ME, July 1, 2015.

16.0 Signature of Environmental Professionals

Preparer:

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR Part 312, and

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

A handwritten signature in black ink that reads "Grant Austin". The signature is written in a cursive style with a large initial "G" and "A".

Grant E. Austin
Environmental Scientist

17.0 Qualifications of Environmental Professionals

Site reconnaissance, research, and report writing were performed by Grant E. Austin, an environmental scientist with a Bachelor of Science Degree in Environmental Science-Natural Resource Conservation (1997, Johnson State College, Johnson, VT).

18.0 Appendices

Figures

Appendix A: Site Photographs

Appendix B: Regulatory Records Documents

Appendix C: Interview Documents

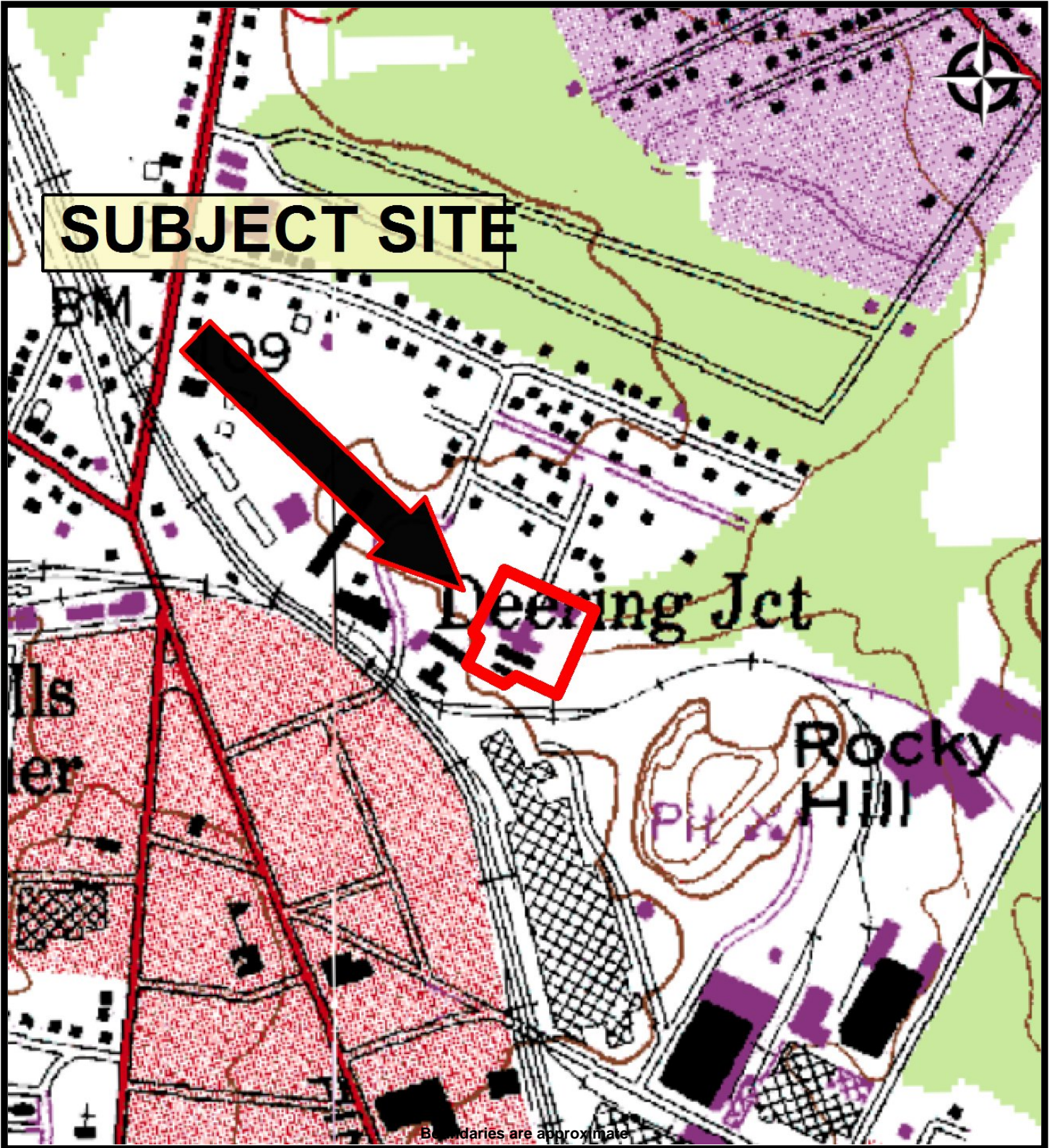
Appendix D: Historical Research Documents

Appendix E: Burt Company Environmental Documents

Appendix F: MDEP Spill Reports

Appendix G: Historical Environmental Records

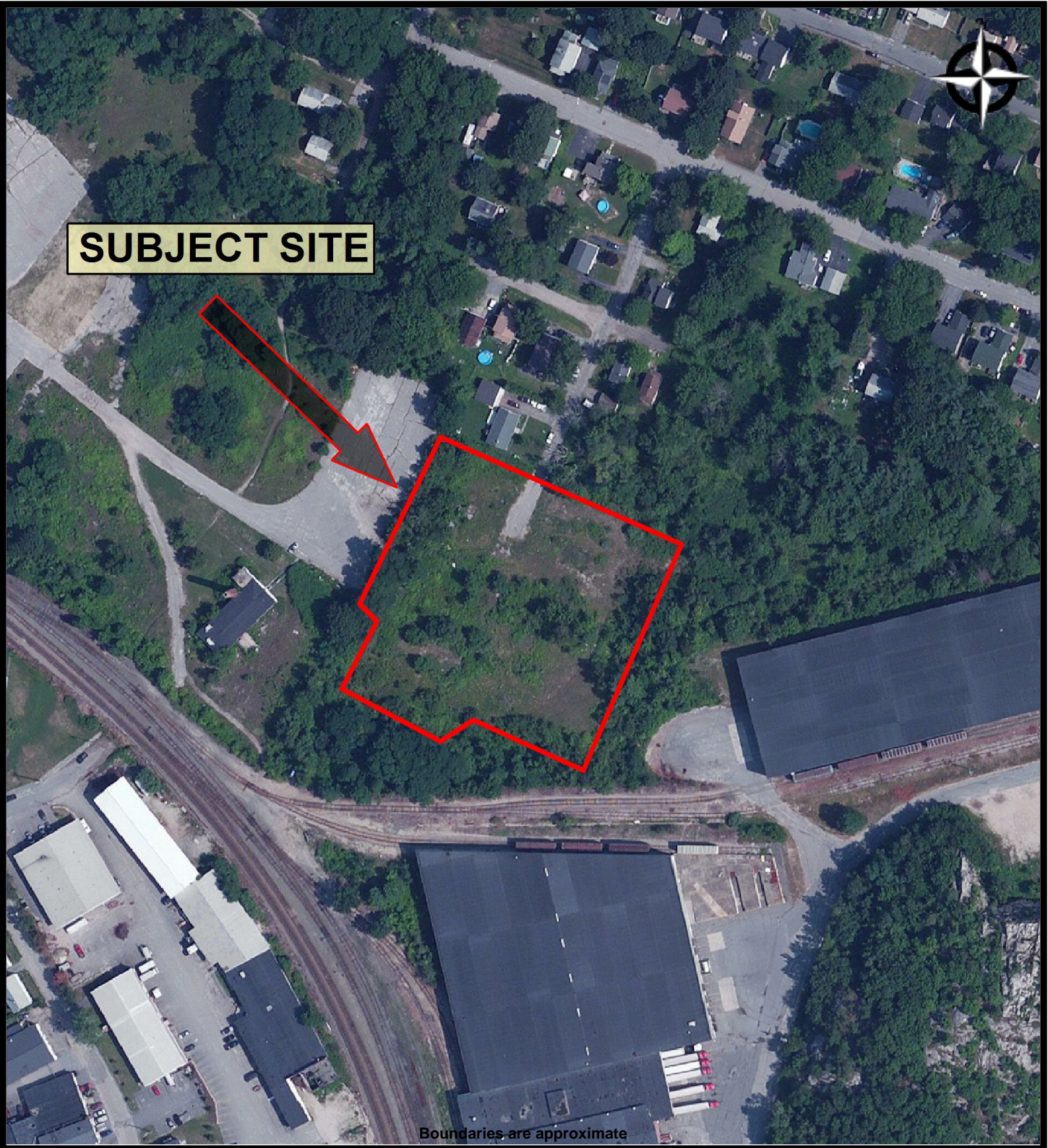
Figures



SITE LOCATION MAP
FORMER BURT COMPANY PARCEL
1 Cambridge Street
Portland Maine 04103

PREPARED FOR: The City of Portland
PROJ. MGR: GEA
DRAWN BY: GEA

DATE: 6/30/2015
PROJ. #: 15056



SITE SKETCH
FORMER BURT COMPANY PARCEL
1 Cambridge Street
Portland Maine 04103

PREPARED FOR: The City of Portland
PROJ. MGR: GEA
DRAWN BY: GEA

DATE: 6/30/2015
PROJ. #: 15056

Appendix A

Site Photographs



Photo 1: Easterly view of the subject site's vacant property of the former location of the Burt Company located at 1 Cambridge Street in Portland, ME.



Photo 2: Existing utility pole on the west side of the property overgrown with vegetation.



Photo 3: Culverted drainage ditch bisecting the center of the subject site.



Photo 4: Obscured view of Milliken Brook located on the southeast portion of the property.



Photo 5: Sporadic solid waste dumping observed in the center of the property.



Photo 6: The largest area of solid waste observed dumped in the center of the property along the drainage ditch.



Photo 7: Old monitoring well observed on the northeast corner of the subject site.



Photo 8: Adjacent residence off the northwest corner of the subject site.

Appendix B

Regulatory Records Documents

Burt Company

1 Cambridge Street
Portland, ME 04103

Inquiry Number: 4329842.2s
June 18, 2015

EDR Summary Radius Map Report

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

1 CAMBRIDGE STREET
PORTLAND, ME 04103

COORDINATES

Latitude (North): 43.6877000 - 43° 41' 15.72"
Longitude (West): 70.2886000 - 70° 17' 18.96"
Universal Transverse Mercator: Zone 19
UTM X (Meters): 396143.9
UTM Y (Meters): 4837778.0
Elevation: 90 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: TP
Source: USGS 7.5 min quad index

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20110716
Source: USDA

MAPPED SITES SUMMARY

Target Property Address:
1 CAMBRIDGE STREET
PORTLAND, ME 04103

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1	BURT COMPANY	1 CAMBRIDGE STREET	ME RGA HWS		TP
A2	BURT COMP	1 CAMBRIDGE ST	ME SHWS, ME ALLSITES, ME LAST, ME BROWNFIELDS		TP
A3	BURT COMPANY	1 CAMBRIDGE STREET	CERCLIS		TP
A4	BURT COMPANY	1 COMBRIDGE STREET	ME RGA HWS		TP
A5	BURT COMPANY	1 CAMBRIDGE STREET	FINDS		TP
A6	MORRILLS CROSSING (P	CORNELL STREET	ME ALLSITES, ME VCP	Higher	79, 0.015, SSW
7	MORRILLS CROSSING (P	MORRILL STREET	ME ALLSITES, ME VCP	Higher	262, 0.050, West
8		31 MORRILL ST	EDR US Hist Auto Stat	Higher	559, 0.106, WSW
9	MORRILLS CROSSING (P	MORRILL STREET	ME ALLSITES, ME VCP	Higher	620, 0.117, WNW
B10	MAACO AUTO PAINTING	24 MORRILL ST	RCRA-SQG, FINDS, NJ MANIFEST	Higher	700, 0.133, WSW
B11		24 MORRILL ST	EDR US Hist Auto Stat	Higher	700, 0.133, WSW
12	MORRILLS CROSSING (P	PRINCETON STREET	ME ALLSITES, ME VCP	Higher	782, 0.148, NNW
C13	M.L. BREWER FINE WOO	91 BELL STREET	ME LUST	Higher	905, 0.171, SSW
C14	MORRILL STREET ASSOC	91 BELL STREET	ME LUST	Higher	905, 0.171, SSW
C15	MORRILL ST ASSOC	91 BELL ST	ME UST	Higher	905, 0.171, SSW
C16	SMITH, DAVID	80 BELL ST	ME UST	Higher	937, 0.177, SSW
C17	NT FOX CO INC	73 BELL ST	ME UST	Higher	949, 0.180, SSW
18	AMERICAN NATL CAN CO	40 QUARRY ROAD	RCRA NonGen / NLR	Higher	1006, 0.191, SSE
19	LEE KELLEY	50 WOODLAWN AVE	ME LAST	Higher	1108, 0.210, NNW
D20	MEINEKE MUFFLER (FOR	FOREST AVE @ MORRILL	ME LUST	Higher	1123, 0.213, WSW
E21	CLASSY CHASSIE CAR W	1139 FOREST AVE	ME UIC, ME LUST	Higher	1134, 0.215, WSW
E22	CLASSY CHASSIE CAR W	1139 FOREST AVE	ME UST	Higher	1134, 0.215, WSW
D23	MEINEKE DISCOUNT MUF	1155 FOREST AVE	ME UST	Higher	1141, 0.216, WSW
D24	MEINEKE DISCOUNT MUF	1155 FOREST AVE	ME UIC, ME LUST	Higher	1141, 0.216, WSW
D25		1155 FOREST AVE	EDR US Hist Auto Stat	Higher	1141, 0.216, WSW
E26	CUMBERLAND FARMS INC	1136 FOREST AVE	ME UIC, ME LUST	Higher	1147, 0.217, WSW
E27	CUMBERLAND FARMS - S	1136 FOREST AVE - RT	ME LUST	Higher	1147, 0.217, WSW
E28	CUMBERLAND FARMS INC	1136 FOREST AVE	ME UST	Higher	1147, 0.217, WSW
E29	CUMBERLAND FARMS #18	1132 FOREST AVENUE	RCRA-CESQG	Higher	1155, 0.219, WSW
E30	CUMBERLAND FARMS GUL	1132 FOREST AVENUE	ME LUST	Higher	1155, 0.219, WSW
F31		1129 FOREST AVE	EDR US Hist Auto Stat	Higher	1156, 0.219, WSW
F32	RICE, REBECCA	1129 FOREST AVE	ME UST	Higher	1156, 0.219, WSW
F33	FORMER GAS STA. (SUS	1127 FOREST AVE	ME LUST	Higher	1162, 0.220, SW
F34		1125 FOREST AVE	EDR US Hist Auto Stat	Higher	1169, 0.221, SW
F35	TEAM AUTO BODY	1125 FOREST AVE	RCRA-SQG, FINDS	Higher	1169, 0.221, SW
G36	DIXON ASSOC. (FORMER	1170 FOREST & STEVEN	ME LUST	Higher	1199, 0.227, West
H37		1113 FOREST AVE	EDR US Hist Auto Stat	Higher	1220, 0.231, SW
G38	DIXON ASSOC	1170 FOREST AVE	ME UST	Higher	1227, 0.232, West
H39		1109 FOREST AVE	EDR US Hist Auto Stat	Higher	1238, 0.234, SW

MAPPED SITES SUMMARY

Target Property Address:
1 CAMBRIDGE STREET
PORTLAND, ME 04103

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
I40	SCRUBADUB AUTO WASH	1185 FOREST AVE	ME UST	Higher	1243, 0.235, West
I41	FILL-IT-UP PLEASE	1185 FOREST AVE	ME ALLSITES, ME UIC, ME LUST, ME INST CONTROL, ME...	Higher	1243, 0.235, West
I42	FILL IT UP PLEASE	1185 FORST AVE	ME LUST	Higher	1243, 0.235, West
43	HERSEY RES.	#5 - 237 ALLEN AVE	ME LAST	Higher	1243, 0.235, WNW
H44	GO GO BURGER	1108 FOREST AVE	ME UST	Higher	1247, 0.236, SW
H45	DR WOLF	1104 FOREST AVE	ME UST	Higher	1261, 0.239, SW
46	BURGESS FOBES PAINT	271 READ ST	RCRA NonGen / NLR, FINDS	Higher	1277, 0.242, SSW
47	HEAT OIL SPILL	APT. BLDG.	ME LUST	Higher	1316, 0.249, NW
48	CASCO NORTHERN PROP.	844 STEVENS AVE	ME LUST	Higher	1350, 0.256, WSW
J49	MORRILLS CROSSING (P	ALLEN AVENUE	ME ALLSITES, ME VCP	Higher	1370, 0.259, WNW
50	BINAX INC	217 READ STREET	RCRA NonGen / NLR, FINDS, ME LUST, ME SPILLS	Higher	1394, 0.264, South
K51	BIG APPLE GAS STA.	6 ALLEN AVE @ MORRIL	ME LUST	Higher	1424, 0.270, WNW
K52	BIG APPLE PORTLAND	6 ALLEN AVE	ME UIC, ME LUST	Higher	1424, 0.270, WNW
53			ME LUST	Higher	1429, 0.271, SSE
54	CUMBERLAND FARMS #18	1136 FOREST AVE @ MO	ME LUST	Higher	1432, 0.271, WSW
L55	PERFORMANCE BRAKE	1080 FOREST AVE	ME UIC, ME LUST	Higher	1442, 0.273, SSW
L56	NORTHERN UTILITIES I	1075 FOREST AVE.	ME LUST	Higher	1471, 0.279, SSW
J57	YANKEE BINGO BUILDIN	33 ALLEN AVE.	ME LUST	Higher	1476, 0.280, WNW
K58	BIG APPLE	6 ALLEN AVE & FOREST	ME LUST	Higher	1526, 0.289, WNW
K59	BIG APPLE GAS STA.	ALLEN AVE @ MORRILS	ME LUST	Higher	1526, 0.289, WNW
M60	SELTZER & RYDHOLM (P	CANCO RD.	ME LUST	Lower	1623, 0.307, ESE
N61	BROCKWAY SMITH CO	203 REED ST	ME LUST	Higher	1644, 0.311, SSE
O62	MAINE ARMY NAT. GUAR	772 STEVEN'S AVE.	ME LUST	Higher	1648, 0.312, SW
N63	BROCKWAY - SMITH COM	203 READ ST., BOX 63	ME LUST	Higher	1656, 0.314, SSE
P64	PRATT-ABBOTT CORP	1053 FOREST AVE	ME UIC, ME LAST, ME SPILLS	Higher	1667, 0.316, SSW
P65	REVISION HEAT CO.	1053 FOREST AVE, REA	ME LAST	Higher	1667, 0.316, SSW
O66			ME LUST	Higher	1677, 0.318, SW
M67	SELTZER & RYDHOLM DI	250 CANCO RD	ME UIC, ME LUST, ME SPILLS, ME TIER 2	Lower	1680, 0.318, ESE
P68	PRATT ABBOTT CLEANER	4 BELL ST. & FOREST	ME LUST	Higher	1715, 0.325, SSW
69		29 MAYFIELD ST	ME LAST	Higher	1770, 0.335, West
Q70			ME LUST	Higher	1776, 0.336, SSW
Q71	MERRIL TRANS. OIL SP		ME LUST	Higher	1776, 0.336, SSW
Q72	MERRILL TRANSPORT CO	1037 FOREST AVE	ME SHWS, ME ALLSITES, ME UST, ME INST CONTROL	Higher	1782, 0.338, SSW
Q73	MERRILL TRANSPORT CO	1037 FOREST AVE	CERC-NFRAP, RCRA NonGen / NLR, FINDS	Higher	1782, 0.338, SSW
Q74	MERRILL TRANS. TRUCK	1037 FOREST & BELL	ME LUST, ME SPILLS	Higher	1801, 0.341, SSW
75			ME LUST	Higher	1857, 0.352, NW
76	AMERICAN CAN COMPANY	184 READ ST. & CANCO	ME LUST	Lower	1875, 0.355, SSE
77	NELSON & SMALL INC	212 CANCO RD	ME LUST, ME UST	Lower	1880, 0.356, ESE
R78	CENTRAL MAINE POWER	CANCO ROAD	ME LUST, ME SPILLS	Lower	1890, 0.358, SE

MAPPED SITES SUMMARY

Target Property Address:
 1 CAMBRIDGE STREET
 PORTLAND, ME 04103

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
R79	CMP FACILITY	CANCO RD.	ME LUST, ME SPILLS	Lower	1890, 0.358, SE
R80	PORTLAND SERVICE BLD	162 CANCO RD	ME UIC, ME LUST, ME SPILLS, ME TIER 2	Lower	1903, 0.360, SE
81	FORMER HOLDEN COMPAN	75 BISHOP STREET	ME ALLSITES, ME SPILLS, ME INST CONTROL, ME VCP	Higher	2027, 0.384, West
82	PCCI	1024 FOREST & ELMWOOD	ME LUST	Higher	2067, 0.391, SSW
83	AMERICOLD LOGISTICS	165 READ ST	ME UIC, ME LUST, ME LAST, ME AST, ME SPILLS, ME...	Lower	2091, 0.396, SSE
84	SEAMUS HALEY	33 ELMWOOD ST	ME LAST	Higher	2125, 0.402, SSW
S85	WESTBOOK COLLEGE	716 STEVEN'S AVE.	ME LUST, ME SPILLS	Higher	2186, 0.414, SW
S86	UNIVERSITY OF NEW EN	716 STEVENS AVE	ME LUST, ME LAST, ME SPILLS, ME AIRS, ME TIER 2	Higher	2186, 0.414, SW
S87	UNV OF NEW ENGLAND	716 STEVENS AVE - GI	ME LUST	Higher	2186, 0.414, SW
S88	UNE, WESTBROOK COLLE	PROCTOR & ALEXANDER	ME LUST	Higher	2198, 0.416, SW
T89	HILTON, FRANCES & KA	1280 FOREST AVE.	ME LAST	Higher	2217, 0.420, WNW
U90	SPC TRANSPORT COMPAN	150 READ STREET AND	ME LAST, ME SPILLS	Lower	2247, 0.426, SSE
U91	SPC TRANSPORT - CORE	150 - 180 READ STREE	ME LUST	Lower	2247, 0.426, SSE
T92	JOHN BOURQUE	1289 FOREST AVE	ME LAST	Higher	2331, 0.441, WNW
93	MDEP - SOUTHERN ME R	312 CANCO RD	ME LUST, ME LAST, ME SPILLS	Lower	2335, 0.442, East
94	ST JOSEPHS CHURH	STEVENS AVE	ME LAST	Higher	2373, 0.449, SSW
95	KELLY PROP.	40 WARREN AVE.	ME LUST	Higher	2447, 0.463, WNW
96	JANET BARBOUR	132 READ ST	ME LAST	Lower	2451, 0.464, SSE
97	JOSEPH RUSSO	30 CHESLEY AVE	ME LAST	Lower	2515, 0.476, NNE
V98	FATHER HAYES CENTER	673 STEVENS AVE	ME LAST	Higher	2615, 0.495, SSW
V99	EVERGREEN CEMETERY	672 STEVENS AVE	ME LUST, ME UST	Higher	2620, 0.496, SSW

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 8 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
BURT COMPANY 1 CAMBRIDGE STREET PORTLAND, ME	ME RGA HWS Facility ID: REM00767	N/A
BURT COMP 1 CAMBRIDGE ST PORTLAND, ME	ME SHWS : REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM00767 ME ALLSITES Status: REMEDIATION STAGE -REMEDATION NEEDED BUT NOT INITIATED Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM00767 ME LAST Spill Number: P-103-1999 ME BROWNFIELDS Facility Status: REMEDIATION STAGE -REMEDATION NEEDED BUT NOT INITIATED Facility Id: REM00767	N/A
BURT COMPANY 1 CAMBRIDGE STREET PORTLAND, ME 04103	CERCLIS Site ID: 0102158 EPA Id: MED985468024	MED985468024
BURT COMPANY 1 COMBRIDGE STREET PORTLAND, ME	ME RGA HWS	N/A
BURT COMPANY 1 CAMBRIDGE STREET PORTLAND, ME 04103	FINDS Registry ID:: 110009291621	N/A

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

STANDARD ENVIRONMENTAL RECORDS

Federal CERCLIS NFRAP site List

CERC-NFRAP: A review of the CERC-NFRAP list, as provided by EDR, and dated 10/25/2013 has revealed that there is 1 CERC-NFRAP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MERRILL TRANSPORT CO	1037 FOREST AVE	SSW 1/4 - 1/2 (0.338 mi.)	Q73	25

Federal RCRA generators list

RCRA-SQG: A review of the RCRA-SQG list, as provided by EDR, and dated 03/10/2015 has revealed that there are 2 RCRA-SQG sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MAACO AUTO PAINTING	24 MORRILL ST	WSW 1/8 - 1/4 (0.133 mi.)	B10	10
TEAM AUTO BODY	1125 FOREST AVE	SW 1/8 - 1/4 (0.221 mi.)	F35	15

RCRA-CESQG: A review of the RCRA-CESQG list, as provided by EDR, and dated 03/10/2015 has revealed that there is 1 RCRA-CESQG site within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CUMBERLAND FARMS #18	1132 FOREST AVENUE	WSW 1/8 - 1/4 (0.219 mi.)	E29	14

State- and tribal - equivalent CERCLIS

ME SHWS: A review of the ME SHWS list, as provided by EDR, and dated 04/14/2015 has revealed that there is 1 ME SHWS site within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MERRILL TRANSPORT CO : OPERATION AND MAINTENANCE Facility Id: REM00768	1037 FOREST AVE	SSW 1/4 - 1/2 (0.338 mi.)	Q72	24

State and tribal leaking storage tank lists

ME LUST: A review of the ME LUST list, as provided by EDR, and dated 05/02/2015 has revealed that

EXECUTIVE SUMMARY

there are 50 ME LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
M.L. BREWER FINE WOO Spill Number: P-487-1995 Spill Value: Non-Oil, Non-Hazardous Incident	91 BELL STREET	SSW 1/8 - 1/4 (0.171 mi.)	C13	11
MORRILL STREET ASSOC Spill Number: P-796-2012 Spill Value: Oil Incident	91 BELL STREET	SSW 1/8 - 1/4 (0.171 mi.)	C14	11
MEINEKE MUFFLER (FOR Spill Number: P-301-1986 Spill Value: Non-Oil, Non-Hazardous Incident	FOREST AVE @ MORRILL	WSW 1/8 - 1/4 (0.213 mi.)	D20	12
GLASSY CHASSIE CAR W Spill Number: P-532-2007 Spill Value: Non-Oil, Non-Hazardous Incident	1139 FOREST AVE	WSW 1/8 - 1/4 (0.215 mi.)	E21	12
MEINEKE DISCOUNT MUF Spill Number: P-977-2004 Spill Value: Oil Incident	1155 FOREST AVE	WSW 1/8 - 1/4 (0.216 mi.)	D24	13
CUMBERLAND FARMS INC Spill Number: P-54-2008 Spill Value: Oil Incident	1136 FOREST AVE	WSW 1/8 - 1/4 (0.217 mi.)	E26	13
CUMBERLAND FARMS - S Spill Number: P-253-2004 Spill Value: Oil Incident	1136 FOREST AVE - RT	WSW 1/8 - 1/4 (0.217 mi.)	E27	14
CUMBERLAND FARMS GUL Spill Number: P-18-2004 Spill Number: P-187-2011 Spill Value: Oil Incident	1132 FOREST AVENUE	WSW 1/8 - 1/4 (0.219 mi.)	E30	14
FORMER GAS STA. (SUS Spill Number: P-738-1989 Spill Value: Oil Incident	1127 FOREST AVE	SW 1/8 - 1/4 (0.220 mi.)	F33	15
DIXON ASSOC. (FORMER Spill Number: P-437-1991 Spill Number: P-454-2000 Spill Number: P-164-1979 Spill Value: Oil Incident Spill Value: Non-Oil, Non-Hazardous Incident	1170 FOREST & STEVEN	W 1/8 - 1/4 (0.227 mi.)	G36	16
FILL-IT-UP PLEASE Spill Number: P-55-2005 Spill Number: P-107-2005 Spill Number: P-89-2000 Spill Number: P-592-1993 Spill Value: Non-Oil, Non-Hazardous Incident Spill Value: Oil Incident	1185 FOREST AVE	W 1/8 - 1/4 (0.235 mi.)	I41	17
FILL IT UP PLEASE Spill Number: P-491-2004 Spill Number: P-34-2005 Spill Value: Oil Incident	1185 FORST AVE	W 1/8 - 1/4 (0.235 mi.)	I42	17
HEAT OIL SPILL Spill Number: P-91-1986 Spill Value: Oil Incident	APT. BLDG.	NW 1/8 - 1/4 (0.249 mi.)	47	18
CASCO NORTHERN PROP. Spill Number: P-91-1992 Spill Value: Oil Incident	844 STEVENS AVE	WSW 1/4 - 1/2 (0.256 mi.)	48	18

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
BINAX INC Spill Number: P-674-1998 Spill Number: P-342-1997 Spill Value: Oil Incident Spill Value: Non-Oil, Non-Hazardous Incident	217 READ STREET	S 1/4 - 1/2 (0.264 mi.)	50	19
BIG APPLE GAS STA. Spill Number: P-28-1990 Spill Value: Oil Incident	6 ALLEN AVE @ MORRIL	WNW 1/4 - 1/2 (0.270 mi.)	K51	19
BIG APPLE PORTLAND Spill Number: P-940-2002 Spill Value: Oil Incident	6 ALLEN AVE	WNW 1/4 - 1/2 (0.270 mi.)	K52	20
Not reported Spill Number: P-733-1991 Spill Value: Oil Incident		SSE 1/4 - 1/2 (0.271 mi.)	53	20
CUMBERLAND FARMS #18 Spill Number: P-366-1991 Spill Value: Oil Incident	1136 FOREST AVE @ MO	WSW 1/4 - 1/2 (0.271 mi.)	54	20
PERFORMANCE BRAKE Spill Number: P-109-1986 Spill Value: Non-Oil, Non-Hazardous Incident	1080 FOREST AVE	SSW 1/4 - 1/2 (0.273 mi.)	L55	20
NORTHERN UTILITIES I Spill Number: P-363-1992 Spill Value: Oil Incident	1075 FOREST AVE.	SSW 1/4 - 1/2 (0.279 mi.)	L56	21
YANKEE BINGO BUILDIN Spill Number: P-649-1998 Spill Value: Oil Incident	33 ALLEN AVE.	WNW 1/4 - 1/2 (0.280 mi.)	J57	21
BIG APPLE Spill Number: P-175-1990 Spill Number: P-441-1990 Spill Value: Oil Incident	6 ALLEN AVE & FOREST	WNW 1/4 - 1/2 (0.289 mi.)	K58	21
BIG APPLE GAS STA. Spill Number: P-634-1989 Spill Value: Oil Incident	ALLEN AVE @ MORRIS	WNW 1/4 - 1/2 (0.289 mi.)	K59	21
BROCKWAY SMITH CO Spill Number: P-133-2005 Spill Value: Oil Incident	203 REED ST	SSE 1/4 - 1/2 (0.311 mi.)	N61	22
MAINE ARMY NAT. GUAR Spill Number: P-464-1996 Spill Value: Non-Oil, Non-Hazardous Incident	772 STEVEN'S AVE.	SW 1/4 - 1/2 (0.312 mi.)	O62	22
BROCKWAY - SMITH COM Spill Number: P-446-1994 Spill Value: Oil Incident	203 READ ST., BOX 63	SSE 1/4 - 1/2 (0.314 mi.)	N63	22
Not reported Spill Number: P-103-1992 Spill Value: Non-Oil, Non-Hazardous Incident		SW 1/4 - 1/2 (0.318 mi.)	O66	23
PRATT ABBOTT CLEANER Spill Number: P-344-1986 Spill Value: Non-Oil, Non-Hazardous Incident	4 BELL ST. & FOREST	SSW 1/4 - 1/2 (0.325 mi.)	P68	24
Not reported Spill Number: P-783-1992 Spill Value: Oil Incident		SSW 1/4 - 1/2 (0.336 mi.)	Q70	24

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MERRIL TRANS. OIL SP Spill Number: P-750-1992 Spill Value: Oil Incident		SSW 1/4 - 1/2 (0.336 mi.)	Q71	24
MERRILL TRANS. TRUCK Spill Number: P-844-1990 Spill Value: Oil Incident	1037 FOREST & BELL	SSW 1/4 - 1/2 (0.341 mi.)	Q74	25
Not reported Spill Number: P-416-1988 Spill Value: Non-Oil, Non-Hazardous Incident		NW 1/4 - 1/2 (0.352 mi.)	75	26
PCCI Spill Number: P-987-2008 Spill Value: Non-Oil, Non-Hazardous Incident	1024 FOREST & ELMWOOD	SSW 1/4 - 1/2 (0.391 mi.)	82	28
WESTBOOK COLLEGE Spill Number: P-804-1989 Spill Value: Non-Oil, Non-Hazardous Incident	716 STEVEN'S AVE.	SW 1/4 - 1/2 (0.414 mi.)	S85	29
UNIVERSITY OF NEW EN Spill Number: P-840-2005 Spill Number: P-817-2011 Spill Value: Oil Incident	716 STEVENS AVE	SW 1/4 - 1/2 (0.414 mi.)	S86	29
UNV OF NEW ENGLAND Spill Number: P-109-2003 Spill Value: Oil Incident	716 STEVENS AVE - GI	SW 1/4 - 1/2 (0.414 mi.)	S87	30
UNE, WESTBROOK COLLE Spill Number: P-354-2001 Spill Value: Non-Oil, Non-Hazardous Incident	PROCTOR & ALEXANDER	SW 1/4 - 1/2 (0.416 mi.)	S88	30
KELLY PROP. Spill Number: P-338-1993 Spill Value: Oil Incident	40 WARREN AVE.	WNW 1/4 - 1/2 (0.463 mi.)	95	32
EVERGREEN CEMETERY Spill Number: P-135-1999 Spill Value: Non-Oil, Non-Hazardous Incident	672 STEVENS AVE	SSW 1/4 - 1/2 (0.496 mi.)	V99	33
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
SELTZER & RYDHOLM (P) Spill Number: P-612-1992 Spill Value: Oil Incident	CANCO RD.	ESE 1/4 - 1/2 (0.307 mi.)	M60	21
SELTZER & RYDHOLM DI Spill Number: P-1037-2004 Spill Number: P-609-2005 Spill Number: P-52-2010 Spill Number: P-1096-2010 Spill Number: P-197-1998 <i>*Additional key fields are available in the Map Findings section</i> Spill Value: Oil Incident	250 CANCO RD	ESE 1/4 - 1/2 (0.318 mi.)	M67	23
AMERICAN CAN COMPANY Spill Number: P-579-1997 Spill Value: Non-Oil, Non-Hazardous Incident	184 READ ST. & CANCO	SSE 1/4 - 1/2 (0.355 mi.)	76	26
NELSON & SMALL INC Spill Number: P-788-2002 Spill Value: Oil Incident	212 CANCO RD	ESE 1/4 - 1/2 (0.356 mi.)	77	26

EXECUTIVE SUMMARY

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CENTRAL MAINE POWER Spill Number: P-187-1979 Spill Value: Oil Incident	CANCO ROAD	SE 1/4 - 1/2 (0.358 mi.)	R78	26
CMP FACILITY Spill Number: P-57-1989 Spill Value: Oil Incident	CANCO RD.	SE 1/4 - 1/2 (0.358 mi.)	R79	27
PORTLAND SERVICE BLD Spill Number: P-689-1991 Spill Number: P-587-1994 Spill Value: Oil Incident	162 CANCO RD	SE 1/4 - 1/2 (0.360 mi.)	R80	27
AMERICOLD LOGISTICS Spill Number: P-197-2000 Spill Value: Oil Incident	165 READ ST	SSE 1/4 - 1/2 (0.396 mi.)	83	28
SPC TRANSPORT - CORE Spill Number: P-324-1997 Spill Value: Non-Oil, Non-Hazardous Incident	150 - 180 READ STREE	SSE 1/4 - 1/2 (0.426 mi.)	U91	31
MDEP - SOUTHERN ME R Spill Number: P-382-1991 Spill Value: Oil Incident	312 CANCO RD	E 1/4 - 1/2 (0.442 mi.)	93	31

ME LAST: A review of the ME LAST list, as provided by EDR, and dated 05/02/2015 has revealed that there are 16 ME LAST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
LEE KELLEY Spill Number: P-617-2012	50 WOODLAWN AVE	NNW 1/8 - 1/4 (0.210 mi.)	19	12
HERSEY RES. Spill Number: P-492-2000	#5 - 237 ALLEN AVE	WNW 1/8 - 1/4 (0.235 mi.)	43	17
PRATT-ABBOTT CORP Spill Number: P-135-2013	1053 FOREST AVE	SSW 1/4 - 1/2 (0.316 mi.)	P64	22
REVISION HEAT CO. Spill Number: P-883-2011	1053 FOREST AVE, REA	SSW 1/4 - 1/2 (0.316 mi.)	P65	23
Not reported Spill Number: P-220-2000	29 MAYFIELD ST	W 1/4 - 1/2 (0.335 mi.)	69	24
SEAMUS HALEY Spill Number: P-818-2002	33 ELMWOOD ST	SSW 1/4 - 1/2 (0.402 mi.)	84	29
UNIVERSITY OF NEW EN Spill Number: P-418-2013	716 STEVENS AVE	SW 1/4 - 1/2 (0.414 mi.)	S86	29
HILTON, FRANCES & KA Spill Number: P-378-1996	1280 FOREST AVE.	WNW 1/4 - 1/2 (0.420 mi.)	T89	30
JOHN BOURQUE Spill Number: P-182-2000	1289 FOREST AVE	WNW 1/4 - 1/2 (0.441 mi.)	T92	31
ST JOSEPHS CHURH Spill Number: P-878-2002	STEVENS AVE	SSW 1/4 - 1/2 (0.449 mi.)	94	32
FATHER HAYES CENTER Spill Number: P-475-2003	673 STEVENS AVE	SSW 1/4 - 1/2 (0.495 mi.)	V98	32

EXECUTIVE SUMMARY

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
AMERICOLD LOGISTICS Spill Number: P-909-2002 Spill Number: P-48-2010	165 READ ST	SSE 1/4 - 1/2 (0.396 mi.)	83	28
SPC TRANSPORT COMPAN Spill Number: P-306-1996	150 READ STREET AND	SSE 1/4 - 1/2 (0.426 mi.)	U90	31
MDEP - SOUTHERN ME R Spill Number: P-383-1999	312 CANCO RD	E 1/4 - 1/2 (0.442 mi.)	93	31
JANET BARBOUR Spill Number: P-637-2009	132 READ ST	SSE 1/4 - 1/2 (0.464 mi.)	96	32
JOSEPH RUSSO Spill Number: P-112-1994	30 CHESLEY AVE	NNE 1/4 - 1/2 (0.476 mi.)	97	32

State and tribal registered storage tank lists

ME UST: A review of the ME UST list, as provided by EDR, and dated 05/01/2015 has revealed that there are 11 ME UST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MORRILL ST ASSOC Facility Id: 21828 Facility Id: 19159 Tank Status: ABANDONED_IN_PLACE Tank Status: REMOVED Pipe Status: ABANDONED_IN_PLACE Pipe Status: REMOVED	91 BELL ST	SSW 1/8 - 1/4 (0.171 mi.)	C15	11
SMITH, DAVID Facility Id: 15076 Tank Status: REMOVED Pipe Status: REMOVED	80 BELL ST	SSW 1/8 - 1/4 (0.177 mi.)	C16	11
NT FOX CO INC Facility Id: 2045 Tank Status: REMOVED Pipe Status: REMOVED	73 BELL ST	SSW 1/8 - 1/4 (0.180 mi.)	C17	12
CLASSY CHASSIE CAR W Facility Id: 21315 Tank Status: ABANDONED_IN_PLACE Pipe Status: ABANDONED_IN_PLACE	1139 FOREST AVE	WSW 1/8 - 1/4 (0.215 mi.)	E22	13
MEINEKE DISCOUNT MUF Facility Id: 10259 Facility Id: 17494 Tank Status: REMOVED Pipe Status: REMOVED	1155 FOREST AVE	WSW 1/8 - 1/4 (0.216 mi.)	D23	13
CUMBERLAND FARMS INC Facility Id: 12130 Tank Status: REMOVED Tank Status: ACTIVE Pipe Status: REMOVED Pipe Status: ACTIVE	1136 FOREST AVE	WSW 1/8 - 1/4 (0.217 mi.)	E28	14

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
RICE, REBECCA Facility Id: 16885 Tank Status: REMOVED Pipe Status: REMOVED	1129 FOREST AVE	WSW 1/8 - 1/4 (0.219 mi.)	F32	15
DIXON ASSOC Facility Id: 17914 Tank Status: REMOVED Pipe Status: REMOVED	1170 FOREST AVE	W 1/8 - 1/4 (0.232 mi.)	G38	16
SCRUBADUB AUTO WASH Facility Id: 1711 Tank Status: REMOVED Tank Status: ACTIVE Pipe Status: REMOVED Pipe Status: ACTIVE	1185 FOREST AVE	W 1/8 - 1/4 (0.235 mi.)	I40	16
GO GO BURGER Facility Id: 19887 Tank Status: REMOVED Pipe Status: REMOVED	1108 FOREST AVE	SW 1/8 - 1/4 (0.236 mi.)	H44	18
DR WOLF Facility Id: 18063 Tank Status: REMOVED Pipe Status: REMOVED	1104 FOREST AVE	SW 1/8 - 1/4 (0.239 mi.)	H45	18

State and tribal institutional control / engineering control registries

ME INST CONTROL: A review of the ME INST CONTROL list, as provided by EDR, and dated 04/14/2015 has revealed that there are 3 ME INST CONTROL sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
FILL-IT-UP PLEASE Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility Id: REM01521	1185 FOREST AVE	W 1/8 - 1/4 (0.235 mi.)	I41	17
MERRILL TRANSPORT CO Facility Status: OPERATION AND MAINTENANCE Facility Id: REM00768	1037 FOREST AVE	SSW 1/4 - 1/2 (0.338 mi.)	Q72	24
FORMER HOLDEN COMPAN Facility Status: NO FURTHER ACTION Facility Id: REM01113	75 BISHOP STREET	W 1/4 - 1/2 (0.384 mi.)	81	28

State and tribal voluntary cleanup sites

ME VCP: A review of the ME VCP list, as provided by EDR, and dated 04/14/2015 has revealed that there

EXECUTIVE SUMMARY

are 7 ME VCP sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MORRILLS CROSSING (P) Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01794	CORNELL STREET	SSW 0 - 1/8 (0.015 mi.)	A6	9
MORRILLS CROSSING (P) Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01795	MORRILL STREET	W 0 - 1/8 (0.050 mi.)	7	9
MORRILLS CROSSING (P) Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01797	MORRILL STREET	WNW 0 - 1/8 (0.117 mi.)	9	10
MORRILLS CROSSING (P) Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility Id: REM01796	PRINCETON STREET	NNW 1/8 - 1/4 (0.148 mi.)	12	10
FILL-IT-UP PLEASE Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility Id: REM01521	1185 FOREST AVE	W 1/8 - 1/4 (0.235 mi.)	I41	17
MORRILLS CROSSING (P) Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01793	ALLEN AVENUE	WNW 1/4 - 1/2 (0.259 mi.)	J49	19
FORMER HOLDEN COMPAN Facility Status: NO FURTHER ACTION Facility Id: REM01113	75 BISHOP STREET	W 1/4 - 1/2 (0.384 mi.)	81	28

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Hazardous waste / Contaminated Sites

ME ALLSITES: A review of the ME ALLSITES list, as provided by EDR, and dated 04/14/2015 has revealed that there are 8 ME ALLSITES sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MORRILLS CROSSING (P) Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01794	CORNELL STREET	SSW 0 - 1/8 (0.015 mi.)	A6	9
MORRILLS CROSSING (P) Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01795	MORRILL STREET	W 0 - 1/8 (0.050 mi.)	7	9
MORRILLS CROSSING (P) Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01797	MORRILL STREET	WNW 0 - 1/8 (0.117 mi.)	9	10
MORRILLS CROSSING (P) Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility ID: REM01796	PRINCETON STREET	NNW 1/8 - 1/4 (0.148 mi.)	12	10
FILL-IT-UP PLEASE Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility ID: REM01521	1185 FOREST AVE	W 1/8 - 1/4 (0.235 mi.)	I41	17

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MORRILLS CROSSING (P) Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01793	ALLEN AVENUE	WNW 1/4 - 1/2 (0.259 mi.)	J49	19
MERRILL TRANSPORT CO Status: OPERATION AND MAINTENANCE Facility ID: REM00768	1037 FOREST AVE	SSW 1/4 - 1/2 (0.338 mi.)	Q72	24
FORMER HOLDEN COMPAN Status: NO FURTHER ACTION Facility ID: REM01113	75 BISHOP STREET	W 1/4 - 1/2 (0.384 mi.)	81	28

Other Ascertainable Records

RCRA NonGen / NLR: A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 03/10/2015 has revealed that there are 2 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
AMERICAN NATL CAN CO	40 QUARRY ROAD	SSE 1/8 - 1/4 (0.191 mi.)	18	12
BURGESS FOBES PAINT	271 READ ST	SSW 1/8 - 1/4 (0.242 mi.)	46	18

NJ MANIFEST: A review of the NJ MANIFEST list, as provided by EDR, has revealed that there is 1 NJ MANIFEST site within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MAACO AUTO PAINTING EPA Id: MED985467687	24 MORRILL ST	WSW 1/8 - 1/4 (0.133 mi.)	B10	10

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR US Hist Auto Stat: A review of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there are 7 EDR US Hist Auto Stat sites within approximately 0.25 miles of the target property.

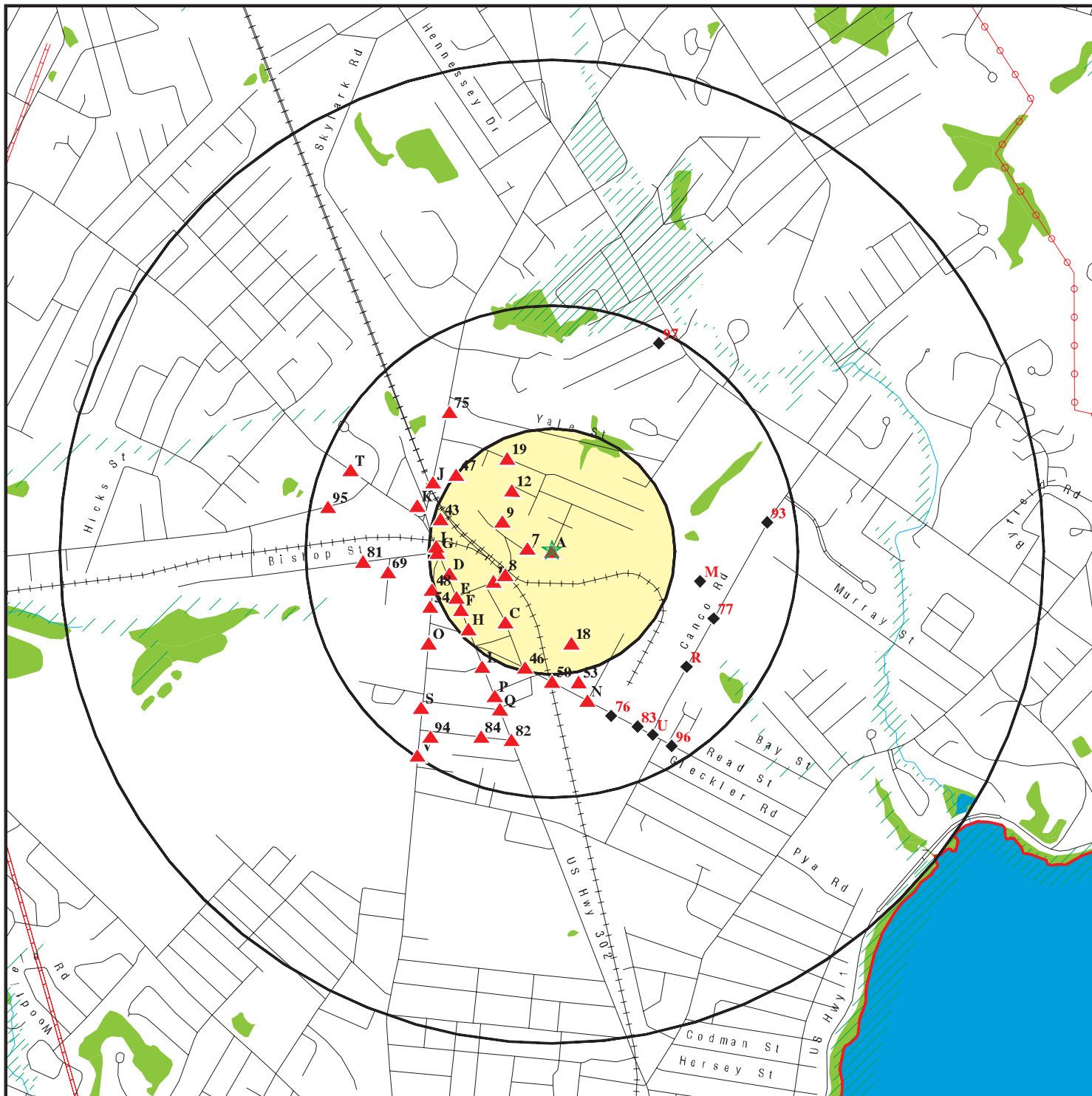
<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
Not reported	31 MORRILL ST	WSW 0 - 1/8 (0.106 mi.)	8	9
Not reported	24 MORRILL ST	WSW 1/8 - 1/4 (0.133 mi.)	B11	10
Not reported	1155 FOREST AVE	WSW 1/8 - 1/4 (0.216 mi.)	D25	13
Not reported	1129 FOREST AVE	WSW 1/8 - 1/4 (0.219 mi.)	F31	15
Not reported	1125 FOREST AVE	SW 1/8 - 1/4 (0.221 mi.)	F34	15
Not reported	1113 FOREST AVE	SW 1/8 - 1/4 (0.231 mi.)	H37	16
Not reported	1109 FOREST AVE	SW 1/8 - 1/4 (0.234 mi.)	H39	16

Count: 11 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
PORTLAND	S106788612	LITTLE PEACH STORE/GAS STATION	ALLEN AVE. @ MORRIL'S CORNER		ME LUST
PORTLAND	S115778932	WARREN MARSHALL	100 DEAKE ST		ME LAST
PORTLAND	S115779009	WILLIS RESIDENCE	44 EDGEWOOD ROAD		ME LAST
PORTLAND	S115778935	JEANNINE RABINOUITZ	24 HARVARD COMMONS		ME LAST
PORTLAND	S110241834	PORTLAND MUNICIPAL LANDFILL - OCEA	OCEAN AVE		ME SHWS, ME ALLSITES, ME INST CONTROL
PORTLAND	S117847258		568 RIVERSIDE ST BETWEEN WARRE		ME SWF/LF
PORTLAND	S117323497	NORTHGATE MOBIL	1397 WASHINGTON & ALLEN AVE.		ME LUST
PORTLAND	S115779119	ANGELONE PIZZA (MOBIL GAS)	801 WASHINGTON & OCEAN AVENUE		ME LUST
PORTLAND	S110534261	NORTHGATE CITGO	WASHINGTON AVE		ME LAST
PORTLAND	S117410683	CUMBERLAND FARMS GULF #1839	801 WASHINGTON & OCEAN AVENUES		ME LUST
PORTLAND	S115779103	MARTINS POINT HEALTH	901 WASHINGTON, RAINBOW MALL		ME LUST

OVERVIEW MAP - 4329842.2S



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

- ▨ Indian Reservations BIA
- ⚡ County Boundary
- ⚡ Power transmission lines
- ⚡ Pipelines
- ▨ 100-year flood zone
- ▨ 500-year flood zone
- National Wetland Inventory
- State Wetlands

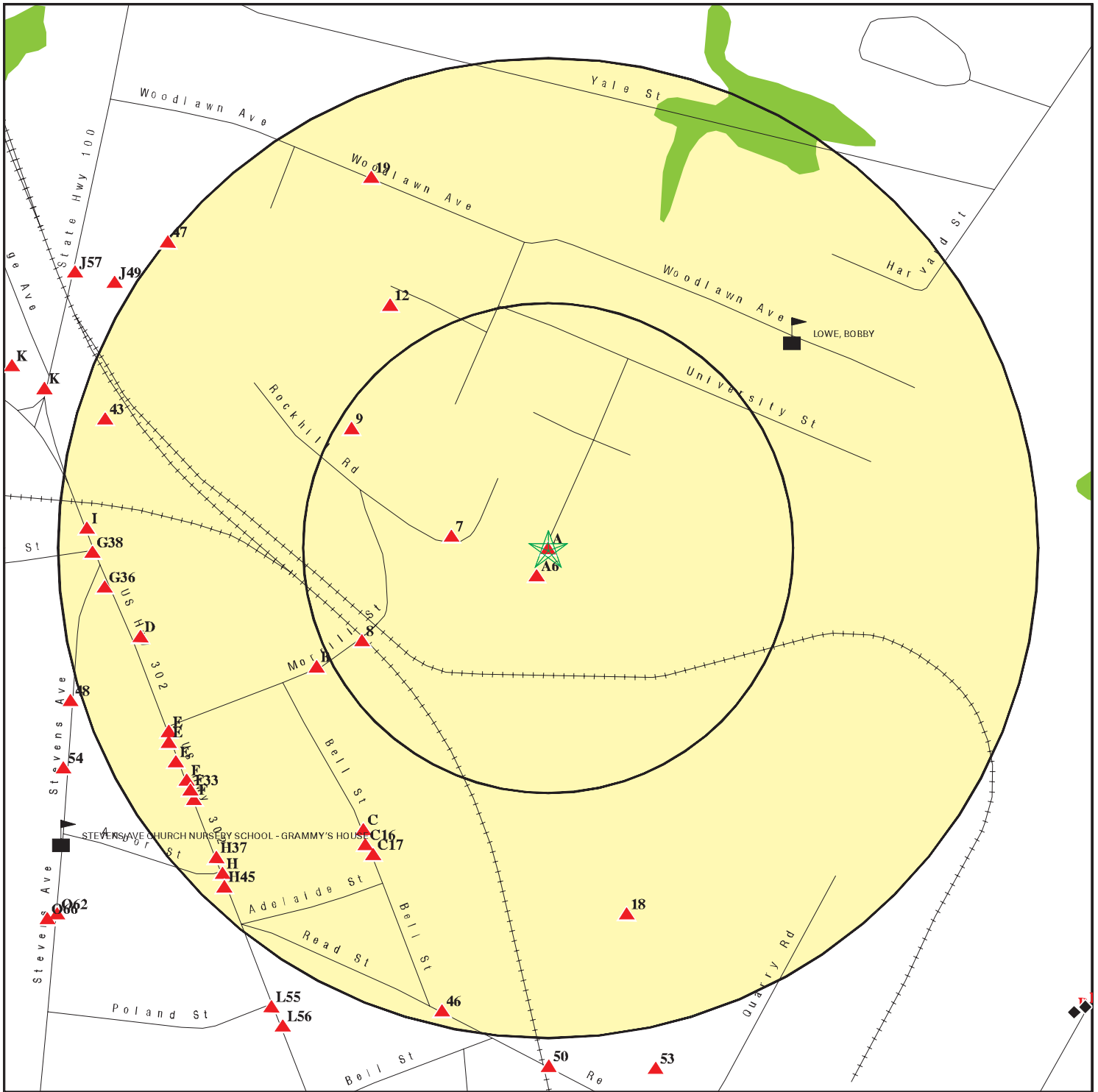


This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Burt Company
 ADDRESS: 1 Cambridge Street
 Portland ME 04103
 LAT/LONG: 43.6877 / 70.2886

CLIENT: Sebago Technics, Inc.
 CONTACT: Grant Austin
 INQUIRY #: 4329842.2s
 DATE: June 18, 2015 3:42 pm

DETAIL MAP - 4329842.2S



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ⚙ Manufactured Gas Plants
- ⚡ Sensitive Receptors
- 🚚 National Priority List Sites
- 🏠 Dept. Defense Sites

- 🏠 Indian Reservations BIA
- 🌊 100-year flood zone
- 🌊 500-year flood zone
- 🌿 National Wetland Inventory
- 🌿 State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Burt Company
 ADDRESS: 1 Cambridge Street
 Portland ME 04103
 LAT/LONG: 43.6877 / 70.2886

CLIENT: Sebago Technics, Inc.
 CONTACT: Grant Austin
 INQUIRY #: 4329842.2s
 DATE: June 18, 2015 3:43 pm

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
<i>Federal NPL site list</i>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
<i>Federal Delisted NPL site list</i>								
Delisted NPL	1.000		0	0	0	0	NR	0
<i>Federal CERCLIS list</i>								
CERCLIS	0.500	1	0	0	0	NR	NR	1
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
<i>Federal CERCLIS NFRAP site List</i>								
CERC-NFRAP	0.500		0	0	1	NR	NR	1
<i>Federal RCRA CORRACTS facilities list</i>								
CORRACTS	1.000		0	0	0	0	NR	0
<i>Federal RCRA non-CORRACTS TSD facilities list</i>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<i>Federal RCRA generators list</i>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		0	2	NR	NR	NR	2
RCRA-CESQG	0.250		0	1	NR	NR	NR	1
<i>Federal institutional controls / engineering controls registries</i>								
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
LUCIS	0.500		0	0	0	NR	NR	0
<i>Federal ERNS list</i>								
ERNS	TP		NR	NR	NR	NR	NR	0
<i>State- and tribal - equivalent CERCLIS</i>								
ME SHWS	1.000	1	0	0	1	0	NR	2
<i>State and tribal landfill and/or solid waste disposal site lists</i>								
ME SWF/LF	0.500		0	0	0	NR	NR	0
ME LCP	0.500		0	0	0	NR	NR	0
<i>State and tribal leaking storage tank lists</i>								
ME LUST	0.500		0	13	37	NR	NR	50
ME LAST	0.500	1	0	2	14	NR	NR	17
INDIAN LUST	0.500		0	0	0	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
State and tribal registered storage tank lists								
ME UST	0.250		0	11	NR	NR	NR	11
ME AST	0.250		0	0	NR	NR	NR	0
INDIAN UST	0.250		0	0	NR	NR	NR	0
FEMA UST	0.250		0	0	NR	NR	NR	0
State and tribal institutional control / engineering control registries								
ME INST CONTROL	0.500		0	1	2	NR	NR	3
State and tribal voluntary cleanup sites								
ME VCP	0.500		3	2	2	NR	NR	7
INDIAN VCP	0.500		0	0	0	NR	NR	0
State and tribal Brownfields sites								
ME BROWNFIELDS	0.500	1	0	0	0	NR	NR	1
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
Local Lists of Landfill / Solid Waste Disposal Sites								
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
ME SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
Local Lists of Hazardous waste / Contaminated Sites								
US CDL	TP		NR	NR	NR	NR	NR	0
ME ALLSITES	0.500	1	3	2	3	NR	NR	9
ME DEL SHWS	1.000		0	0	0	0	NR	0
US HIST CDL	TP		NR	NR	NR	NR	NR	0
Local Land Records								
LIENS 2	TP		NR	NR	NR	NR	NR	0
ME LIENS	TP		NR	NR	NR	NR	NR	0
Records of Emergency Release Reports								
HMIRS	TP		NR	NR	NR	NR	NR	0
ME SPILLS	TP		NR	NR	NR	NR	NR	0
ME SPILLS 80	TP		NR	NR	NR	NR	NR	0
ME SPILLS 90	TP		NR	NR	NR	NR	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	0.250		0	2	NR	NR	NR	2
DOT OPS	TP		NR	NR	NR	NR	NR	0

MAP FINDINGS SUMMARY

<u>Database</u>	<u>Search Distance (Miles)</u>	<u>Target Property</u>	<u>< 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>> 1</u>	<u>Total Plotted</u>
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NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

MAP FINDINGS

Map ID
Direction
Distance
Elevation

Site

Database(s)

EDR ID Number
EPA ID Number

A1
Target
Property

BURT COMPANY
1 CAMBRIDGE STREET
PORTLAND, ME

ME RGA HWS **S114992767**
N/A

Actual:
90 ft.

[Click here for full text details](#)

ME RGA HWS
Facility ID: REM00767

A2
Target
Property

BURT COMP
1 CAMBRIDGE ST
PORTLAND, ME

ME SHWS **S108228969**
ME ALLSITES **N/A**
ME LAST
ME BROWNFIELDS

Actual:
90 ft.

[Click here for full text details](#)

ME SHWS
Facility Id: REM00767
: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED

ME ALLSITES
Status: REMEDIATION STAGE -REMEDICATION NEEDED BUT NOT INITIATED
Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED
Facility ID: REM00767

ME LAST
Spill Number: P-103-1999

ME BROWNFIELDS
Facility Status: REMEDIATION STAGE -REMEDICATION NEEDED BUT NOT INITIATED
Facility Id: REM00767

A3
Target
Property

BURT COMPANY
1 CAMBRIDGE STREET
PORTLAND, ME 04103

CERCLIS **1000391479**
MED985468024

Actual:
90 ft.

[Click here for full text details](#)

CERCLIS
EPA Id: MED985468024
Site ID: 0102158

A4
Target
Property

BURT COMPANY
1 COMBRIDGE STREET
PORTLAND, ME

ME RGA HWS **S114992768**
N/A

Actual:
90 ft.

[Click here for full text details](#)

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
A5 Target Property	BURT COMPANY 1 CAMBRIDGE STREET PORTLAND, ME 04103	FINDS	1016278043 N/A
Actual: 90 ft.	Click here for full text details FINDS Registry ID:: 110009291621		
A6 SSW < 1/8 0.015 mi. 79 ft.	MORRILLS CROSSING (PARCEL CP) CORNELL STREET PORTLAND, ME	ME ALLSITES ME VCP	S109059077 N/A
Relative: Higher	Click here for full text details ME ALLSITES Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01794 ME VCP Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01794		
7 West < 1/8 0.050 mi. 262 ft.	MORRILLS CROSSING (PARCEL A2) MORRILL STREET PORTLAND, ME	ME ALLSITES ME VCP	S109059075 N/A
Relative: Higher	Click here for full text details ME ALLSITES Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility ID: REM01795 ME VCP Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED Facility Id: REM01795		
8 WSW < 1/8 0.106 mi. 559 ft.	31 MORRILL ST PORTLAND, ME 04103	EDR US Hist Auto Stat	1015411725 N/A
Relative: Higher	Click here for full text details		

MAP FINDINGS

Map ID Direction Distance Elevation		Database(s)	EDR ID Number EPA ID Number
--	--	-------------	--------------------------------

9 WNW < 1/8 0.117 mi. 620 ft.	MORRILLS CROSSING (PARCEL B) MORRILL STREET PORTLAND, ME Click here for full text details	ME ALLSITES ME VCP	S109059076 N/A
--	---	-------------------------------------	---------------------------------

Relative: Higher

ME ALLSITES
 Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED
 Facility ID: REM01797

ME VCP
 Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED
 Facility Id: REM01797

B10 WSW 1/8-1/4 0.133 mi. 700 ft.	MAACO AUTO PAINTING & BODY WORKS 24 MORRILL ST PORTLAND, ME 04103 Click here for full text details	RCRA-SQG FINDS NJ MANIFEST	1000293938 MED985467687
--	--	---	--

Relative: Higher

RCRA-SQG
 EPA Id: MED985467687

FINDS
 Registry ID:: 110003557320

NJ MANIFEST
 EPA Id: MED985467687

B11 WSW 1/8-1/4 0.133 mi. 700 ft.	24 MORRILL ST PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat	1015353085 N/A
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Relative: Higher

12 NNW 1/8-1/4 0.148 mi. 782 ft.	MORRILLS CROSSING (PARCEL D) PRINCETON STREET PORTLAND, ME Click here for full text details	ME ALLSITES ME VCP	S109059078 N/A
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Relative: Higher

ME ALLSITES
 Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT
 Facility ID: REM01796

ME VCP
 Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT

MAP FINDINGS

Map ID			EDR ID Number
Direction			EPA ID Number
Distance		Database(s)	
Elevation	Site		

MORRILLS CROSSING (PARCEL D) (Continued)

S109059078

Facility Id: REM01796

<p>C13 SSW 1/8-1/4 0.171 mi. 905 ft.</p>	<p>M.L. BREWER FINE WOODWORKING INC. 91 BELL STREET PORTLAND, ME</p>	<p>ME LUST</p>	<p>S104219600 N/A</p>
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[Click here for full text details](#)

Relative:
Higher

ME LUST
Spill Value: Non-Oil, Non-Hazardous Incident
Spill Number: P-487-1995

<p>C14 SSW 1/8-1/4 0.171 mi. 905 ft.</p>	<p>MORRILL STREET ASSOCIATES, INC. 91 BELL STREET PORTLAND, ME</p>	<p>ME LUST</p>	<p>S113450930 N/A</p>
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[Click here for full text details](#)

Relative:
Higher

ME LUST
Spill Value: Oil Incident
Spill Number: P-796-2012

<p>C15 SSW 1/8-1/4 0.171 mi. 905 ft.</p>	<p>MORRILL ST ASSOC 91 BELL ST PORTLAND, ME</p>	<p>ME UST</p>	<p>U002290990 N/A</p>
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[Click here for full text details](#)

Relative:
Higher

ME UST
Pipe Status: ABANDONED_IN_PLACE
Pipe Status: REMOVED
Facility Id: 21828
Facility Id: 19159

<p>C16 SSW 1/8-1/4 0.177 mi. 937 ft.</p>	<p>SMITH, DAVID 80 BELL ST PORTLAND, ME</p>	<p>ME UST</p>	<p>U000232847 N/A</p>
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[Click here for full text details](#)

Relative:
Higher

ME UST
Pipe Status: REMOVED
Facility Id: 15076

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
C17 SSW 1/8-1/4 0.180 mi. 949 ft.	NT FOX CO INC 73 BELL ST PORTLAND, ME	ME UST	U003097070 N/A
Relative: Higher	Click here for full text details ME UST Pipe Status: REMOVED Facility Id: 2045		
18 SSE 1/8-1/4 0.191 mi. 1006 ft.	AMERICAN NATL CAN CO 40 QUARRY ROAD PORTLAND, ME 04103	RCRA NonGen / NLR	1000358504 MED083177840
Relative: Higher	Click here for full text details RCRA NonGen / NLR EPA Id: MED083177840		
19 NNW 1/8-1/4 0.210 mi. 1108 ft.	LEE KELLEY 50 WOODLAWN AVE PORTLAND, ME	ME LAST	S113450851 N/A
Relative: Higher	Click here for full text details ME LAST Spill Number: P-617-2012		
D20 WSW 1/8-1/4 0.213 mi. 1123 ft.	MEINEKE MUFFLER (FORMER GAS STA.) FOREST AVE @ MORRILL'S CNR PORTLAND, ME	ME LUST	S106403058 N/A
Relative: Higher	Click here for full text details ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-301-1986		
E21 WSW 1/8-1/4 0.215 mi. 1134 ft.	CLASSY CHASSIE CAR WASH 1139 FOREST AVE PORTLAND, ME 04103	ME UIC ME LUST	S110078374 N/A
Relative: Higher	Click here for full text details ME UIC Site Id: 800024 ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-532-2007		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
E22 WSW 1/8-1/4 0.215 mi. 1134 ft.	CLASSY CHASSIE CAR WASH 1139 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U004140142 N/A
Relative: Higher	ME UST Pipe Status: ABANDONED_IN_PLACE Facility Id: 21315		
D23 WSW 1/8-1/4 0.216 mi. 1141 ft.	MEINEKE DISCOUNT MUFFLERS 1155 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U003560458 N/A
Relative: Higher	ME UST Pipe Status: REMOVED Facility Id: 10259 Facility Id: 17494		
D24 WSW 1/8-1/4 0.216 mi. 1141 ft.	MEINEKE DISCOUNT MUFFLER 1155 FOREST AVE PORTLAND, ME 04103 Click here for full text details	ME UIC ME LUST	U003561199 N/A
Relative: Higher	ME UIC Site Id: 800765 ME LUST Spill Value: Oil Incident Spill Number: P-977-2004		
D25 WSW 1/8-1/4 0.216 mi. 1141 ft.	1155 FOREST AVE PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat	1015169556 N/A
Relative: Higher			
E26 WSW 1/8-1/4 0.217 mi. 1147 ft.	CUMBERLAND FARMS INC #1805 1136 FOREST AVE PORTLAND, ME 04103 Click here for full text details	ME UIC ME LUST	S110076796 N/A
Relative: Higher	ME UIC Site Id: 201349		

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

CUMBERLAND FARMS INC #1805 (Continued)

S110076796

ME LUST

Spill Value: Oil Incident
Spill Number: P-54-2008

E27
WSW
1/8-1/4
0.217 mi.
1147 ft.

CUMBERLAND FARMS - STORE 1805
1136 FOREST AVE - RT 302
PORTLAND, ME

ME LUST **S106795183**
N/A

[Click here for full text details](#)

Relative:
Higher

ME LUST

Spill Value: Oil Incident
Spill Number: P-253-2004

E28
WSW
1/8-1/4
0.217 mi.
1147 ft.

CUMBERLAND FARMS INC 1805
1136 FOREST AVE
PORTLAND, ME

ME UST **U003099164**
N/A

[Click here for full text details](#)

Relative:
Higher

ME UST

Pipe Status: REMOVED
Pipe Status: ACTIVE
Facility Id: 12130

E29
WSW
1/8-1/4
0.219 mi.
1155 ft.

CUMBERLAND FARMS #1805
1132 FOREST AVENUE
PORTLAND, ME 04103

RCRA-CESQG **1007370788**
MER000502856

[Click here for full text details](#)

Relative:
Higher

RCRA-CESQG

EPA Id: MER000502856

E30
WSW
1/8-1/4
0.219 mi.
1155 ft.

CUMBERLAND FARMS GULF #1805
1132 FOREST AVENUE
PORTLAND, ME

ME LUST **S106674370**
N/A

[Click here for full text details](#)

Relative:
Higher

ME LUST

Spill Value: Oil Incident
Spill Number: P-18-2004
Spill Number: P-187-2011

MAP FINDINGS

Map ID			EDR ID Number
Direction			EPA ID Number
Distance			
Elevation	Site	Database(s)	

F31 WSW 1/8-1/4 0.219 mi. 1156 ft. Relative: Higher	1129 FOREST AVE PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat 1015162867 N/A	
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F32 WSW 1/8-1/4 0.219 mi. 1156 ft. Relative: Higher	RICE, REBECCA 1129 FOREST AVE PORTLAND, ME Click here for full text details ME UST Pipe Status: REMOVED Facility Id: 16885	ME UST U000234497 N/A	
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F33 SW 1/8-1/4 0.220 mi. 1162 ft. Relative: Higher	FORMER GAS STA. (SUSAN'S FISH) 1127 FOREST AVE PORTLAND, ME Click here for full text details ME LUST Spill Value: Oil Incident Spill Number: P-738-1989	ME LUST S104208612 N/A	
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F34 SW 1/8-1/4 0.221 mi. 1169 ft. Relative: Higher	1125 FOREST AVE PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat 1015162186 N/A	
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F35 SW 1/8-1/4 0.221 mi. 1169 ft. Relative: Higher	TEAM AUTO BODY 1125 FOREST AVE PORTLAND, ME 04103 Click here for full text details RCRA-SQG EPA Id: MED037711801 FINDS Registry ID:: 110003554555	RCRA-SQG FINDS 1000293937 MED037711801	
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MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
G36 West 1/8-1/4 0.227 mi. 1199 ft.	DIXON ASSOC. (FORMER AMOCO) 1170 FOREST & STEVENS PORTLAND, ME Click here for full text details	ME LUST	S106789341 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-437-1991 Spill Number: P-454-2000 Spill Number: P-164-1979		
H37 SW 1/8-1/4 0.231 mi. 1220 ft.	1113 FOREST AVE PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat	1015158497 N/A
Relative: Higher			
G38 West 1/8-1/4 0.232 mi. 1227 ft.	DIXON ASSOC 1170 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U000243485 N/A
Relative: Higher	ME UST Pipe Status: REMOVED Facility Id: 17914		
H39 SW 1/8-1/4 0.234 mi. 1238 ft.	1109 FOREST AVE PORTLAND, ME 04103 Click here for full text details	EDR US Hist Auto Stat	1015156011 N/A
Relative: Higher			
I40 West 1/8-1/4 0.235 mi. 1243 ft.	SCRUBADUB AUTO WASH 1185 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U003097002 N/A
Relative: Higher	ME UST Pipe Status: REMOVED Pipe Status: ACTIVE Facility Id: 1711		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
I41 West 1/8-1/4 0.235 mi. 1243 ft.	FILL-IT-UP PLEASE 1185 FOREST AVE PORTLAND, ME 04103 Click here for full text details	ME ALLSITES ME UIC ME LUST ME INST CONTROL ME VCP	S110076806 N/A
Relative: Higher	ME ALLSITES Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility ID: REM01521 ME UIC Site Id: 800053 Site Id: 201371 ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Value: Oil Incident Spill Number: P-55-2005 Spill Number: P-107-2005 Spill Number: P-89-2000 Spill Number: P-592-1993 ME INST CONTROL Facility Id: REM01521 Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT ME VCP Facility Status: NO FURTHER ACTION - NO FURTHER ACTION DOCUMENT Facility Id: REM01521		
I42 West 1/8-1/4 0.235 mi. 1243 ft.	FILL IT UP PLEASE 1185 FORST AVE PORTLAND, ME Click here for full text details	ME LUST	S108393121 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-491-2004 Spill Number: P-34-2005		
43 WNW 1/8-1/4 0.235 mi. 1243 ft.	HERSEY RES. #5 - 237 ALLEN AVE PORTLAND, ME Click here for full text details	ME LAST	S105110680 N/A
Relative: Higher	ME LAST Spill Number: P-492-2000		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
H44 SW 1/8-1/4 0.236 mi. 1247 ft.	GO GO BURGER 1108 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U003301889 N/A
Relative: Higher	ME UST Pipe Status: REMOVED Facility Id: 19887		
H45 SW 1/8-1/4 0.239 mi. 1261 ft.	DR WOLF 1104 FOREST AVE PORTLAND, ME Click here for full text details	ME UST	U000245506 N/A
Relative: Higher	ME UST Pipe Status: REMOVED Facility Id: 18063		
46 SSW 1/8-1/4 0.242 mi. 1277 ft.	BURGESS FOBES PAINT & LACQUER 271 READ ST PORTLAND, ME 04103 Click here for full text details	RCRA NonGen / NLR FINDS	1000234213 MED086886835
Relative: Higher	RCRA NonGen / NLR EPA Id: MED086886835 FINDS Registry ID:: 110003555750		
47 NW 1/8-1/4 0.249 mi. 1316 ft.	HEAT OIL SPILL APT. BLDG. PORTLAND, ME Click here for full text details	ME LUST	S106792010 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-91-1986		
48 WSW 1/4-1/2 0.256 mi. 1350 ft.	CASCO NORTHERN PROP. 844 STEVENS AVE PORTLAND, ME Click here for full text details	ME LUST	S104213029 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident		

MAP FINDINGS

Map ID			EDR ID Number
Direction			EPA ID Number
Distance		Database(s)	
Elevation	Site		

CASCO NORTHERN PROP. (Continued)

S104213029

Spill Number: P-91-1992

J49
WNW
1/4-1/2
0.259 mi.
1370 ft.

MORRILLS CROSSING (PARCEL A1)
ALLEN AVENUE
PORTLAND, ME

ME ALLSITES
ME VCP

S109059074
N/A

[Click here for full text details](#)

Relative:
Higher

ME ALLSITES

Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED
Facility ID: REM01793

ME VCP

Facility Status: REMEDIATION STAGE - REMEDIATION NEEDED BUT NOT INITIATED
Facility Id: REM01793

50
South
1/4-1/2
0.264 mi.
1394 ft.

BINAX INC
217 READ STREET
PORTLAND, ME 04103

RCRA NonGen / NLR
FINDS
ME LUST
ME SPILLS

1004722017
MER000500116

[Click here for full text details](#)

Relative:
Higher

RCRA NonGen / NLR

EPA Id: MER000500116

FINDS

Registry ID:: 110006659053

ME LUST

Spill Value: Oil Incident
Spill Value: Non-Oil, Non-Hazardous Incident
Spill Number: P-674-1998
Spill Number: P-342-1997

ME SPILLS

Spill Number: P-805-2002

K51
WNW
1/4-1/2
0.270 mi.
1424 ft.

BIG APPLE GAS STA.
6 ALLEN AVE @ MORRILLS CNR.
PORTLAND, ME

ME LUST

S104207191
N/A

[Click here for full text details](#)

Relative:
Higher

ME LUST

Spill Value: Oil Incident
Spill Number: P-28-1990

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
K52 WNW 1/4-1/2 0.270 mi. 1424 ft.	BIG APPLE PORTLAND 6 ALLEN AVE PORTLAND, ME 04101 Click here for full text details	ME UIC ME LUST	S104212117 N/A
Relative: Higher	ME UIC Site Id: 462427 Site Id: 201335 ME LUST Spill Value: Oil Incident Spill Number: P-940-2002		
53 SSE 1/4-1/2 0.271 mi. 1429 ft.	PORTLAND, ME Click here for full text details	ME LUST	S109802109 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-733-1991		
54 WSW 1/4-1/2 0.271 mi. 1432 ft.	CUMBERLAND FARMS #1805 1136 FOREST AVE @ MORRILL'S CNR. PORTLAND, ME Click here for full text details	ME LUST	S106793173 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-366-1991		
L55 SSW 1/4-1/2 0.273 mi. 1442 ft.	PERFORMANCE BRAKE 1080 FOREST AVE PORTLAND, ME 04103 Click here for full text details	ME UIC ME LUST	S110078627 N/A
Relative: Higher	ME UIC Site Id: 800686 Site Id: 800879 ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-109-1986		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
L56 SSW 1/4-1/2 0.279 mi. 1471 ft.	NORTHERN UTILITIES INC. 1075 FOREST AVE. PORTLAND, ME Click here for full text details	ME LUST	S104214190 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-363-1992		
J57 WNW 1/4-1/2 0.280 mi. 1476 ft.	YANKEE BINGO BUILDING 33 ALLEN AVE. PORTLAND, ME Click here for full text details	ME LUST	S106794178 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-649-1998		
K58 WNW 1/4-1/2 0.289 mi. 1526 ft.	BIG APPLE 6 ALLEN AVE & FOREST AVE. PORTLAND, ME Click here for full text details	ME LUST	S104208674 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-175-1990 Spill Number: P-441-1990		
K59 WNW 1/4-1/2 0.289 mi. 1526 ft.	BIG APPLE GAS STA. ALLEN AVE @ MORRILS CORNER PORTLAND, ME Click here for full text details	ME LUST	S107446884 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-634-1989		
M60 ESE 1/4-1/2 0.307 mi. 1623 ft.	SELTZER & RYDHOLM (PEPSI) CANCO RD. PORTLAND, ME Click here for full text details	ME LUST	S106793876 N/A
Relative: Lower	ME LUST Spill Value: Oil Incident Spill Number: P-612-1992		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
N61 SSE 1/4-1/2 0.311 mi. 1644 ft.	BROCKWAY SMITH CO 203 REED ST PORTLAND, ME Click here for full text details	ME LUST	S107446887 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-133-2005		
O62 SW 1/4-1/2 0.312 mi. 1648 ft.	MAINE ARMY NAT. GUARD 772 STEVEN'S AVE. PORTLAND, ME Click here for full text details	ME LUST	S104222471 N/A
Relative: Higher	ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-464-1996		
N63 SSE 1/4-1/2 0.314 mi. 1656 ft.	BROCKWAY - SMITH COMPANY 203 READ ST., BOX 636 PORTLAND, ME Click here for full text details	ME LUST	S104217328 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-446-1994		
P64 SSW 1/4-1/2 0.316 mi. 1667 ft.	PRATT-ABBOTT CORP 1053 FOREST AVE PORTLAND, ME 04101 Click here for full text details	ME UIC ME LAST ME SPILLS	S110078156 N/A
Relative: Higher	ME UIC Site Id: 600117 ME LAST Spill Number: P-135-2013 ME SPILLS Spill Number: P-96-1990 Spill Number: P-584-2013		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
P65 SSW 1/4-1/2 0.316 mi. 1667 ft. Relative: Higher	REVISION HEAT CO. 1053 FOREST AVE, REAR LOT PORTLAND, ME Click here for full text details ME LAST Spill Number: P-883-2011	ME LAST	S115779025 N/A
O66 SW 1/4-1/2 0.318 mi. 1677 ft. Relative: Higher	PORTLAND, ME Click here for full text details ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-103-1992	ME LUST	S109801773 N/A
M67 ESE 1/4-1/2 0.318 mi. 1680 ft. Relative: Lower	SELTZER & RYDHOLM DIST INC 250 CANCO RD PORTLAND, ME 04104 Click here for full text details ME UIC Site Id: 400449 ME LUST Spill Value: Oil Incident Spill Number: P-1037-2004 Spill Number: P-609-2005 Spill Number: P-52-2010 Spill Number: P-1096-2010 Spill Number: P-197-1998 Spill Number: P-746-1996 ME SPILLS Spill Number: P-711-1991 ME TIER 2 Facility Id: FATR20086AW5SU002UT4 Facility Id: FATR20075N6EGD0028T7 Facility Id: FATR20107QQTE9002EZ7 Facility Id: FATR20096AW5SU002UT4	ME UIC ME LUST ME SPILLS ME TIER 2	S106795965 N/A

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
P68 SSW 1/4-1/2 0.325 mi. 1715 ft.	PRATT ABBOTT CLEANERS 4 BELL ST. & FOREST AVE PORTLAND, ME Click here for full text details	ME LUST	S104201933 N/A
Relative: Higher	ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-344-1986		
69 West 1/4-1/2 0.335 mi. 1770 ft.	29 MAYFIELD ST PORTLAND, ME Click here for full text details	ME LAST	S105793450 N/A
Relative: Higher	ME LAST Spill Number: P-220-2000		
Q70 SSW 1/4-1/2 0.336 mi. 1776 ft.	PORTLAND, ME Click here for full text details	ME LUST	S109802135 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-783-1992		
Q71 SSW 1/4-1/2 0.336 mi. 1776 ft.	MERRIL TRANS. OIL SPILL PORTLAND, ME Click here for full text details	ME LUST	S106789799 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-750-1992		
Q72 SSW 1/4-1/2 0.338 mi. 1782 ft.	MERRILL TRANSPORT CO 1037 FOREST AVE PORTLAND, ME Click here for full text details	ME SHWS ME ALLSITES ME UST ME INST CONTROL	U002164780 N/A
Relative: Higher	ME SHWS Facility Id: REM00768 : OPERATION AND MAINTENANCE		
	ME ALLSITES		

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

MERRILL TRANSPORT CO (Continued)

U002164780

Status: OPERATION AND MAINTENANCE
Facility ID: REM00768

ME UST

Pipe Status: REMOVED
Pipe Status: ABANDONED_IN_PLACE
Facility Id: 4166

ME INST CONTROL

Facility Id: REM00768
Facility Status: OPERATION AND MAINTENANCE

Q73
SSW
1/4-1/2
0.338 mi.
1782 ft.

MERRILL TRANSPORT CO
1037 FOREST AVE
PORTLAND, ME 04104

CERC-NFRAP **1000361924**
RCRA NonGen / NLR **MED007995632**
FINDS

[Click here for full text details](#)

Relative:
Higher

CERC-NFRAP
EPA Id: MED007995632
Site ID: 0100983

RCRA NonGen / NLR
EPA Id: MED007995632

FINDS

Registry ID:: 110003554010

Q74
SSW
1/4-1/2
0.341 mi.
1801 ft.

MERRILL TRANS. TRUCKING
1037 FOREST & BELL
PORTLAND, ME

ME LUST **S104210999**
ME SPILLS **N/A**

[Click here for full text details](#)

Relative:
Higher

ME LUST
Spill Value: Oil Incident
Spill Number: P-844-1990

ME SPILLS

Spill Number: P-816-1990

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
75 NW 1/4-1/2 0.352 mi. 1857 ft.	PORTLAND, ME Click here for full text details ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-416-1988	ME LUST	S109801955 N/A
76 SSE 1/4-1/2 0.355 mi. 1875 ft.	AMERICAN CAN COMPANY BLDG. 184 READ ST. & CANCO PORTLAND, ME Click here for full text details ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-579-1997	ME LUST	S104324490 N/A
77 ESE 1/4-1/2 0.356 mi. 1880 ft.	NELSON & SMALL INC 212 CANCO RD PORTLAND, ME Click here for full text details ME LUST Spill Value: Oil Incident Spill Number: P-788-2002 ME UST Pipe Status: REMOVED Facility Id: 4219	ME LUST ME UST	U002164484 N/A
R78 SE 1/4-1/2 0.358 mi. 1890 ft.	CENTRAL MAINE POWER CANCO ROAD PORTLAND, ME Click here for full text details ME LUST Spill Value: Oil Incident Spill Number: P-187-1979 ME SPILLS Spill Number: P-419-1999	ME LUST ME SPILLS	S106791506 N/A

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
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R79 SE 1/4-1/2 0.358 mi. 1890 ft.	CMP FACILITY CANCO RD. PORTLAND, ME	ME LUST ME SPILLS	S106796611 N/A
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[Click here for full text details](#)

Relative:
Lower

ME LUST

Spill Value: Oil Incident
Spill Number: P-57-1989

ME SPILLS

Spill Number: P-290-1987

R80 SE 1/4-1/2 0.360 mi. 1903 ft.	PORTLAND SERVICE BLDG 162 CANCO RD PORTLAND, ME 04104	ME UIC ME LUST ME SPILLS ME TIER 2	S110077342 N/A
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[Click here for full text details](#)

Relative:
Lower

ME UIC

Site Id: 400030

ME LUST

Spill Value: Oil Incident
Spill Number: P-689-1991
Spill Number: P-587-1994

ME SPILLS

Spill Number: P-67-2005
Spill Number: P-1188-2004
Spill Number: P-604-2006
Spill Number: P-72-2000
Spill Number: P-231-2009
Spill Number: P-102-2010
Spill Number: P-300-2011
Spill Number: P-1064-2007
Spill Number: P-798-2011
Spill Number: P-374-2011
Spill Number: P-457-2013
Spill Number: P-219-2013
Spill Number: P-716-2013
Spill Number: P-1014-2013
Spill Number: P-808-2000
Spill Number: P-275-2000

ME TIER 2

Facility Id: FATR2013491ZLR02XC0T
Facility Id: FATR2011491ZLR02XC0T

MAP FINDINGS

Map ID Direction Distance Elevation		Database(s)	EDR ID Number EPA ID Number
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81 West 1/4-1/2 0.384 mi. 2027 ft.	FORMER HOLDEN COMPANY 75 BISHOP STREET PORTLAND, ME Click here for full text details	ME ALLSITES ME SPILLS ME INST CONTROL ME VCP	S109072929 N/A
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Relative:
Higher

ME ALLSITES
 Status: NO FURTHER ACTION
 Facility ID: REM01113

ME SPILLS
 Spill Number: P-683-1993

ME INST CONTROL
 Facility Id: REM01113
 Facility Status: NO FURTHER ACTION

ME VCP
 Facility Status: NO FURTHER ACTION
 Facility Id: REM01113

82 SSW 1/4-1/2 0.391 mi. 2067 ft.	PCCI 1024 FOREST & ELMWOOD STREETS PORTLAND, ME Click here for full text details	ME LUST	S111436111 N/A
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Relative:
Higher

ME LUST
 Spill Value: Non-Oil, Non-Hazardous Incident
 Spill Number: P-987-2008

83 SSE 1/4-1/2 0.396 mi. 2091 ft.	AMERICOLD LOGISTICS 75573 165 READ ST PORTLAND, ME 4103 Click here for full text details	ME UIC ME LUST ME LAST ME AST ME SPILLS ME TIER 2	1003428037 N/A
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ME UIC
 Site Id: 400111

ME LUST
 Spill Value: Oil Incident
 Spill Number: P-197-2000

ME LAST
 Spill Number: P-909-2002
 Spill Number: P-48-2010

ME AST

Map ID
 Direction
 Distance
 Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
 EPA ID Number

AMERICOLD LOGISTICS 75573 (Continued)

1003428037

Facility Id: FATR200969DCXJ002UFL
 Facility Id: FATR201069DCXJ002UFL
 Facility Id: FATR200869DCXJ002UFL
 Facility Id: FATR201169DCXJ002UFL
 Facility Status: INSIDE

ME SPILLS

Spill Number: P-207-2011

ME TIER 2

Facility Id: FATR201169DCXJ002UFL
 Facility Id: FATR200869DCXJ002UFL
 Facility Id: FATR20139SGHFF0022Y3
 Facility Id: FATR201069DCXJ002UFL
 Facility Id: FATR200969DCXJ002UFL
 Facility Id: FATR201294MAB7002V2L

84
SSW
 1/4-1/2
 0.402 mi.
 2125 ft.

SEAMUS HALEY
33 ELMWOOD ST
PORTLAND, ME

ME LAST **S106073305**
N/A

[Click here for full text details](#)

Relative:
 Higher

ME LAST

Spill Number: P-818-2002

S85
SW
 1/4-1/2
 0.414 mi.
 2186 ft.

WESTBOOK COLLEGE
716 STEVEN'S AVE.
PORTLAND, ME

ME LUST **S104200606**
ME SPILLS **N/A**

[Click here for full text details](#)

Relative:
 Higher

ME LUST

Spill Value: Non-Oil, Non-Hazardous Incident
 Spill Number: P-804-1989

ME SPILLS

Spill Number: P-24-1985

S86
SW
 1/4-1/2
 0.414 mi.
 2186 ft.

UNIVERSITY OF NEW ENGLAND
716 STEVENS AVE
PORTLAND, ME 04101

ME LUST **S105793754**
ME LAST **N/A**
ME SPILLS
ME AIRS
ME TIER 2

[Click here for full text details](#)

Relative:
 Higher

ME LUST

Spill Value: Oil Incident
 Spill Number: P-840-2005
 Spill Number: P-817-2011

Map ID
Direction
Distance
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number
EPA ID Number

UNIVERSITY OF NEW ENGLAND (Continued)

S105793754

ME LAST

Spill Number: P-418-2013

ME SPILLS

Spill Number: P-274-1991

Spill Number: P-539-2002

Spill Number: P-705-2002

ME TIER 2

Facility Id: FATR20064YZ7Y8002XZ7

Facility Id: FATR200971N4TY002SRM

Facility Id: FATR20107QVCAC00K8T0

Facility Id: FATR20085NHKH000226M

Facility Id: FATR20117QVCAC00K8T0

Facility Id: FATR20127QVCAC00K8T0

Facility Id: FATR20137QVCAC00K8T0

Facility Id: FATR20075NHKH000226M

S87
SW
1/4-1/2
0.414 mi.
2186 ft.

UNV OF NEW ENGLAND
716 STEVENS AVE - GINN-MCDOUGAL HALL
PORTLAND, ME

ME LUST **S106402847**
N/A

Relative:
Higher

[Click here for full text details](#)

ME LUST

Spill Value: Oil Incident

Spill Number: P-109-2003

S88
SW
1/4-1/2
0.416 mi.
2198 ft.

UNE, WESTBROOK COLLEGE
PROCTOR & ALEXANDER HALLS
PORTLAND, ME

ME LUST **S106788301**
N/A

Relative:
Higher

[Click here for full text details](#)

ME LUST

Spill Value: Non-Oil, Non-Hazardous Incident

Spill Number: P-354-2001

T89
WNW
1/4-1/2
0.420 mi.
2217 ft.

HILTON, FRANCES & KATHLEEN; BASEMENT
1280 FOREST AVE.
PORTLAND, ME

ME LAST **S104222212**
N/A

Relative:
Higher

[Click here for full text details](#)

ME LAST

Spill Number: P-378-1996

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
U90 SSE 1/4-1/2 0.426 mi. 2247 ft.	SPC TRANSPORT COMPANY 150 READ STREET AND CANCO RD. PORTLAND, ME Click here for full text details	ME LAST ME SPILLS	S104221295 N/A
Relative: Lower	ME LAST Spill Number: P-306-1996 ME SPILLS Spill Number: P-457-1996		
U91 SSE 1/4-1/2 0.426 mi. 2247 ft.	SPC TRANSPORT - COREY ELECTRIC - J B BROWN 150 - 180 READ STREET PORTLAND, ME Click here for full text details	ME LUST	S104878181 N/A
Relative: Lower	ME LUST Spill Value: Non-Oil, Non-Hazardous Incident Spill Number: P-324-1997		
T92 WNW 1/4-1/2 0.441 mi. 2331 ft.	JOHN BOURQUE 1289 FOREST AVE PORTLAND, ME Click here for full text details	ME LAST	S107026817 N/A
Relative: Higher	ME LAST Spill Number: P-182-2000		
93 East 1/4-1/2 0.442 mi. 2335 ft.	MDEP - SOUTHERN ME REGIONAL OFFICE 312 CANCO RD PORTLAND, ME Click here for full text details	ME LUST ME LAST ME SPILLS	S103520894 N/A
Relative: Lower	ME LUST Spill Value: Oil Incident Spill Number: P-382-1991 ME LAST Spill Number: P-383-1999 ME SPILLS Spill Number: P-930-2003 Spill Number: P-927-2004 Spill Number: P-26-2007 Spill Number: P-196-1994 Spill Number: P-735-1999		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
94 SSW 1/4-1/2 0.449 mi. 2373 ft.	ST JOSEPHS CHURH STEVENS AVE PORTLAND, ME Click here for full text details	ME LAST	S105110028 N/A
Relative: Higher	ME LAST Spill Number: P-878-2002		
95 WNW 1/4-1/2 0.463 mi. 2447 ft.	KELLY PROP. 40 WARREN AVE. PORTLAND, ME Click here for full text details	ME LUST	S104215698 N/A
Relative: Higher	ME LUST Spill Value: Oil Incident Spill Number: P-338-1993		
96 SSE 1/4-1/2 0.464 mi. 2451 ft.	JANET BARBOUR 132 READ ST PORTLAND, ME Click here for full text details	ME LAST	S111860663 N/A
Relative: Lower	ME LAST Spill Number: P-637-2009		
97 NNE 1/4-1/2 0.476 mi. 2515 ft.	JOSEPH RUSSO 30 CHESLEY AVE PORTLAND, ME Click here for full text details	ME LAST	S108393244 N/A
Relative: Lower	ME LAST Spill Number: P-112-1994		
V98 SSW 1/4-1/2 0.495 mi. 2615 ft.	FATHER HAYES CENTER 673 STEVENS AVE PORTLAND, ME Click here for full text details	ME LAST	S110648123 N/A
Relative: Higher	ME LAST Spill Number: P-475-2003		

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
--	------	-------------	--------------------------------

V99
SSW
1/4-1/2
0.496 mi.
2620 ft.

EVERGREEN CEMETERY
672 STEVENS AVE
PORTLAND, ME

ME LUST	U002165850
ME UST	N/A

[Click here for full text details](#)

Relative:
Higher

ME LUST
 Spill Value: Non-Oil, Non-Hazardous Incident
 Spill Number: P-135-1999

ME UST
 Pipe Status: REMOVED
 Facility Id: 7994

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
ME	AIRS	Emissions Inventory Data	Department of Environmental Protection	12/31/2012	06/19/2014	07/30/2014
ME	ALLSITES	Remediation Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
ME	AST	Aboveground Storage Tanks	Maine Emergency Management Agency	12/31/2013	09/16/2014	10/22/2014
ME	AST 2	Registered Petroleum Tanks Database	Department of Environmental Protection	04/07/2015	04/09/2015	05/07/2015
ME	BROWNFIELDS	Remediation Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
ME	DEL HWS	Sites Removed from the Uncontrolled Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
ME	DRYCLEANERS	Drycleaner Facilities	Department of Environmental Protection	12/30/2014	01/12/2015	03/20/2015
ME	INST CONTROL	Remediation Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
ME	LAST	HOSS Database	Department of Environmental Protection	05/02/2015	05/06/2015	05/19/2015
ME	LCP	Municipal Landfill Closure Database	Department of Environmental Protection	11/14/2011	11/15/2011	11/30/2011
ME	LIENS	Environmental Liens Information Listing	Department of Environmental Protection	01/22/2015	01/23/2015	02/13/2015
ME	LUST	Hazardous Material and Oil Spill System Database (H.O.S.S.)	Department of Environmental Protection	05/02/2015	05/06/2015	05/19/2015
ME	NPDES	Wastewater Facilities Listing	Department of Environmental Protection	03/30/2015	03/31/2015	04/08/2015
ME	RG A HWS	Recovered Government Archive State Hazardous Waste Facilities	Department of Environmental Protection		07/01/2013	01/08/2014
ME	RG A LF	Recovered Government Archive Solid Waste Facilities List	Department of Environmental Protection		07/01/2013	01/17/2014
ME	RG A LUST	Recovered Government Archive Leaking Underground Storage Tanks	Department of Environmental Protection		07/01/2013	01/10/2014
ME	SHWS	Remediation Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
ME	SPILLS	Hazardous Material and Oil Spill System Database	Department of Environmental Protection	05/02/2015	05/06/2015	05/19/2015
ME	SPILLS 80	SPILLS80 data from FirstSearch	FirstSearch	06/07/2001	01/03/2013	03/06/2013
ME	SPILLS 90	SPILLS90 data from FirstSearch	FirstSearch	11/05/2012	01/03/2013	01/25/2013
ME	SWF/LF	Solid Waste Facility List	Department of Environmental Protection	05/11/2015	05/12/2015	06/15/2015
ME	SWRCY	Recycling Facilities	Department of Environmental Protection	12/13/2011	12/15/2011	01/23/2012
ME	TIER 2	Tier 2 Information Listing	Maine Emergency Management Agency	12/31/2013	09/16/2014	11/19/2014
ME	UIC	Underground Injection Control	Department of Environmental Protection	05/26/2015	05/28/2015	06/15/2015
ME	UST	Underground Storage Tank Database	Department of Environmental Protection	05/01/2015	05/20/2015	06/16/2015
ME	VCP	Remediation Sites List	Department of Environmental Protection	04/14/2015	04/21/2015	05/07/2015
US	2020 COR ACTION	2020 Corrective Action Program List	Environmental Protection Agency	04/22/2013	03/03/2015	03/09/2015
US	BRS	Biennial Reporting System	EPA/NTIS	12/31/2011	02/26/2013	04/19/2013
US	CERCLIS	Comprehensive Environmental Response, Compensation, and Liability	EPA	10/25/2013	11/11/2013	02/13/2014
US	CERCLIS-NFRAP	CERCLIS No Further Remedial Action Planned	EPA	10/25/2013	11/11/2013	02/13/2014
US	COAL ASH DOE	Steam-Electric Plant Operation Data	Department of Energy	12/31/2005	08/07/2009	10/22/2009
US	COAL ASH EPA	Coal Combustion Residues Surface Impoundments List	Environmental Protection Agency	07/01/2014	09/10/2014	10/20/2014
US	CONSENT	Superfund (CERCLA) Consent Decrees	Department of Justice, Consent Decree Library	12/31/2014	04/17/2015	06/02/2015
US	CORRACTS	Corrective Action Report	EPA	03/10/2015	03/31/2015	06/11/2015
US	DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations	EPA, Region 9	01/12/2009	05/07/2009	09/21/2009
US	DELISTED NPL	National Priority List Deletions	EPA	12/16/2014	01/08/2015	02/09/2015
US	DOD	Department of Defense Sites	USGS	12/31/2005	11/10/2006	01/11/2007
US	DOT OPS	Incident and Accident Data	Department of Transportation, Office of Pipeline	07/31/2012	08/07/2012	09/18/2012
US	EDR MGP	EDR Proprietary Manufactured Gas Plants	EDR, Inc.			
US	EDR US Hist Auto Stat	EDR Exclusive Historic Gas Stations	EDR, Inc.			
US	EDR US Hist Cleaners	EDR Exclusive Historic Dry Cleaners	EDR, Inc.			
US	EPA WATCH LIST	EPA WATCH LIST	Environmental Protection Agency	08/30/2013	03/21/2014	06/17/2014
US	ERNS	Emergency Response Notification System	National Response Center, United States Coast	03/30/2015	03/31/2015	06/02/2015
US	FEDERAL FACILITY	Federal Facility Site Information listing	Environmental Protection Agency	03/26/2015	04/08/2015	06/11/2015
US	FEDLAND	Federal and Indian Lands	U.S. Geological Survey	12/31/2005	02/06/2006	01/11/2007
US	FEMA UST	Underground Storage Tank Listing	FEMA	01/01/2010	02/16/2010	04/12/2010
US	FINDS	Facility Index System/Facility Registry System	EPA	01/18/2015	02/27/2015	03/25/2015

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA/Office of Prevention, Pesticides and Toxi	04/09/2009	04/16/2009	05/11/2009
US	FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA	04/09/2009	04/16/2009	05/11/2009
US	FUDS	Formerly Used Defense Sites	U.S. Army Corps of Engineers	06/06/2014	09/10/2014	09/18/2014
US	HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HIST FTTS INSP	FIFRA/TSCA Tracking System Inspection & Enforcement Case Lis	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HMIRS	Hazardous Materials Information Reporting System	U.S. Department of Transportation	03/30/2015	03/31/2015	06/11/2015
US	ICIS	Integrated Compliance Information System	Environmental Protection Agency	01/23/2015	02/06/2015	03/09/2015
US	INDIAN LUST R1	Leaking Underground Storage Tanks on Indian Land	EPA Region 1	02/01/2013	05/01/2013	11/01/2013
US	INDIAN LUST R10	Leaking Underground Storage Tanks on Indian Land	EPA Region 10	02/03/2015	02/12/2015	03/13/2015
US	INDIAN LUST R4	Leaking Underground Storage Tanks on Indian Land	EPA Region 4	09/30/2014	03/03/2015	03/13/2015
US	INDIAN LUST R5	Leaking Underground Storage Tanks on Indian Land	EPA, Region 5	01/30/2015	02/05/2015	03/09/2015
US	INDIAN LUST R6	Leaking Underground Storage Tanks on Indian Land	EPA Region 6	01/23/2015	02/10/2015	03/13/2015
US	INDIAN LUST R7	Leaking Underground Storage Tanks on Indian Land	EPA Region 7	09/23/2014	11/25/2014	01/29/2015
US	INDIAN LUST R8	Leaking Underground Storage Tanks on Indian Land	EPA Region 8	01/28/2015	01/30/2015	03/13/2015
US	INDIAN LUST R9	Leaking Underground Storage Tanks on Indian Land	Environmental Protection Agency	01/08/2015	01/08/2015	02/09/2015
US	INDIAN ODI	Report on the Status of Open Dumps on Indian Lands	Environmental Protection Agency	12/31/1998	12/03/2007	01/24/2008
US	INDIAN RESERV	Indian Reservations	USGS	12/31/2005	12/08/2006	01/11/2007
US	INDIAN UST R1	Underground Storage Tanks on Indian Land	EPA, Region 1	02/01/2013	05/01/2013	01/27/2014
US	INDIAN UST R10	Underground Storage Tanks on Indian Land	EPA Region 10	02/03/2015	02/12/2015	03/13/2015
US	INDIAN UST R4	Underground Storage Tanks on Indian Land	EPA Region 4	09/30/2014	03/03/2015	03/13/2015
US	INDIAN UST R5	Underground Storage Tanks on Indian Land	EPA Region 5	01/30/2015	02/05/2015	03/13/2015
US	INDIAN UST R6	Underground Storage Tanks on Indian Land	EPA Region 6	01/23/2015	02/13/2015	03/13/2015
US	INDIAN UST R7	Underground Storage Tanks on Indian Land	EPA Region 7	09/23/2014	11/25/2014	01/29/2015
US	INDIAN UST R8	Underground Storage Tanks on Indian Land	EPA Region 8	01/29/2015	01/30/2015	03/13/2015
US	INDIAN UST R9	Underground Storage Tanks on Indian Land	EPA Region 9	12/14/2014	02/13/2015	03/13/2015
US	INDIAN VCP R1	Voluntary Cleanup Priority Listing	EPA, Region 1	09/29/2014	10/01/2014	11/06/2014
US	INDIAN VCP R7	Voluntary Cleanup Priority Lisiting	EPA, Region 7	03/20/2008	04/22/2008	05/19/2008
US	LEAD SMELTER 1	Lead Smelter Sites	Environmental Protection Agency	11/25/2014	11/26/2014	01/29/2015
US	LEAD SMELTER 2	Lead Smelter Sites	American Journal of Public Health	04/05/2001	10/27/2010	12/02/2010
US	LIENS 2	CERCLA Lien Information	Environmental Protection Agency	02/18/2014	03/18/2014	04/24/2014
US	LUCIS	Land Use Control Information System	Department of the Navy	05/28/2015	05/29/2015	06/11/2015
US	MLTS	Material Licensing Tracking System	Nuclear Regulatory Commission	03/31/2015	04/09/2015	06/11/2015
US	NPL	National Priority List	EPA	12/16/2014	01/08/2015	02/09/2015
US	NPL LIENS	Federal Superfund Liens	EPA	10/15/1991	02/02/1994	03/30/1994
US	ODI	Open Dump Inventory	Environmental Protection Agency	06/30/1985	08/09/2004	09/17/2004
US	PADS	PCB Activity Database System	EPA	07/01/2014	10/15/2014	11/17/2014
US	PCB TRANSFORMER	PCB Transformer Registration Database	Environmental Protection Agency	02/01/2011	10/19/2011	01/10/2012
US	PRP	Potentially Responsible Parties	EPA	10/25/2013	10/17/2014	10/20/2014
US	Proposed NPL	Proposed National Priority List Sites	EPA	12/16/2014	01/08/2015	02/09/2015
US	RAATS	RCRA Administrative Action Tracking System	EPA	04/17/1995	07/03/1995	08/07/1995
US	RADINFO	Radiation Information Database	Environmental Protection Agency	04/07/2015	04/09/2015	06/11/2015
US	RCRA NonGen / NLR	RCRA - Non Generators / No Longer Regulated	Environmental Protection Agency	03/10/2015	03/31/2015	06/11/2015
US	RCRA-CESQG	RCRA - Conditionally Exempt Small Quantity Generators	Environmental Protection Agency	03/10/2015	03/31/2015	06/11/2015
US	RCRA-LQG	RCRA - Large Quantity Generators	Environmental Protection Agency	03/10/2015	03/31/2015	06/11/2015
US	RCRA-SQG	RCRA - Small Quantity Generators	Environmental Protection Agency	03/10/2015	03/31/2015	06/11/2015
US	RCRA-TSDF	RCRA - Treatment, Storage and Disposal	Environmental Protection Agency	03/10/2015	03/31/2015	06/11/2015
US	RMP	Risk Management Plans	Environmental Protection Agency	02/01/2015	02/13/2015	03/25/2015

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	ROD	Records Of Decision	EPA	11/25/2013	12/12/2013	02/24/2014
US	SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing	Environmental Protection Agency	03/07/2011	03/09/2011	05/02/2011
US	SSTS	Section 7 Tracking Systems	EPA	12/31/2009	12/10/2010	02/25/2011
US	TRIS	Toxic Chemical Release Inventory System	EPA	12/31/2013	02/12/2015	06/02/2015
US	TSCA	Toxic Substances Control Act	EPA	12/31/2012	01/15/2015	01/29/2015
US	UMTRA	Uranium Mill Tailings Sites	Department of Energy	09/14/2010	10/07/2011	03/01/2012
US	US AIRS (AFS)	Aerometric Information Retrieval System Facility Subsystem (EPA	10/16/2014	10/31/2014	11/17/2014
US	US AIRS MINOR	Air Facility System Data	EPA	10/16/2014	10/31/2014	11/17/2014
US	US BROWNFIELDS	A Listing of Brownfields Sites	Environmental Protection Agency	03/23/2015	03/24/2015	06/02/2015
US	US CDL	Clandestine Drug Labs	Drug Enforcement Administration	02/25/2015	03/10/2015	03/25/2015
US	US ENG CONTROLS	Engineering Controls Sites List	Environmental Protection Agency	03/16/2015	03/17/2015	06/02/2015
US	US FIN ASSUR	Financial Assurance Information	Environmental Protection Agency	03/09/2015	03/10/2015	03/25/2015
US	US HIST CDL	National Clandestine Laboratory Register	Drug Enforcement Administration	02/25/2015	03/10/2015	03/25/2015
US	US INST CONTROL	Sites with Institutional Controls	Environmental Protection Agency	03/16/2015	03/17/2015	06/02/2015
US	US MINES	Mines Master Index File	Department of Labor, Mine Safety and Health A	12/30/2014	12/31/2014	01/29/2015
CT	CT MANIFEST	Hazardous Waste Manifest Data	Department of Energy & Environmental Protecti	07/30/2013	08/19/2013	10/03/2013
NJ	NJ MANIFEST	Manifest Information	Department of Environmental Protection	12/31/2012	04/29/2015	05/29/2015
NY	NY MANIFEST	Facility and Manifest Data	Department of Environmental Conservation	05/01/2015	05/06/2015	05/20/2015
PA	PA MANIFEST	Manifest Information	Department of Environmental Protection	12/31/2013	07/21/2014	08/25/2014
RI	RI MANIFEST	Manifest information	Department of Environmental Management	12/31/2013	07/15/2014	08/13/2014
VT	VT MANIFEST	Hazardous Waste Manifest Data	Department of Environmental Conservation	12/22/2014	02/06/2015	02/27/2015
US	Oil/Gas Pipelines	GeoData Digital Line Graphs from 1:100,000-Scale Maps	USGS			
US	Electric Power Lines	Electric Power Transmission Line Data	Rextag Strategies Corp.			
US	AHA Hospitals	Sensitive Receptor: AHA Hospitals	American Hospital Association, Inc.			
US	Medical Centers	Sensitive Receptor: Medical Centers	Centers for Medicare & Medicaid Services			
US	Nursing Homes	Sensitive Receptor: Nursing Homes	National Institutes of Health			
US	Public Schools	Sensitive Receptor: Public Schools	National Center for Education Statistics			
US	Private Schools	Sensitive Receptor: Private Schools	National Center for Education Statistics			
ME	Daycare Centers	Sensitive Receptor: Child Care Listing	Department of Human Services			
US	Flood Zones	100-year and 500-year flood zones	Emergency Management Agency (FEMA)			
US	NWI	National Wetlands Inventory	U.S. Fish and Wildlife Service			
ME	State Wetlands	Wetlands Inventory	Office of Geographic Information Systems			
US	USGS 7.5' Topographic Map	Scanned Digital USGS 7.5' Topographic Map (DRG)	USGS			

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St **Acronym** **Full Name** **Government Agency** **Gov Date** **Arvl. Date** **Active Date**

STREET AND ADDRESS INFORMATION

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GEOCHECK[®] - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

BURT COMPANY
1 CAMBRIDGE STREET
PORTLAND, ME 04103

TARGET PROPERTY COORDINATES

Latitude (North):	43.6877 - 43° 41' 15.72"
Longitude (West):	70.2886 - 70° 17' 18.96"
Universal Tranverse Mercator:	Zone 19
UTM X (Meters):	396143.9
UTM Y (Meters):	4837778.0
Elevation:	90 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	43070-F3 PORTLAND WEST, ME
Most Recent Revision:	1978

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

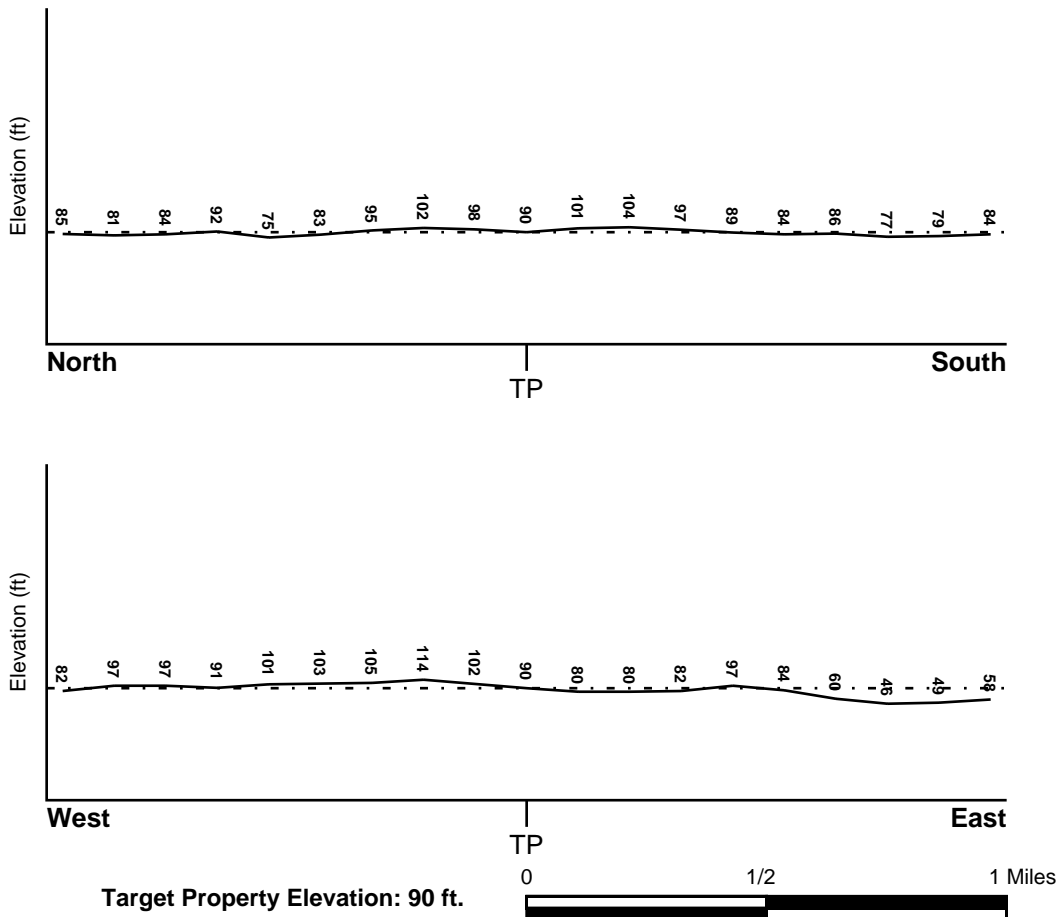
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General East

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

<u>Target Property County</u> CUMBERLAND, ME	FEMA Flood <u>Electronic Data</u> YES - refer to the Overview Map and Detail Map
Flood Plain Panel at Target Property:	2300510007B - FEMA Q3 Flood data
Additional Panels in search area:	2300510002B - FEMA Q3 Flood data 2300510006B - FEMA Q3 Flood data

NATIONAL WETLAND INVENTORY

<u>NWI Quad at Target Property</u> PORTLAND WEST	NWI Electronic <u>Data Coverage</u> YES - refer to the Overview Map and Detail Map
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HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION</u> <u>FROM TP</u>	<u>GENERAL DIRECTION</u> <u>GROUNDWATER FLOW</u>
Not Reported		

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

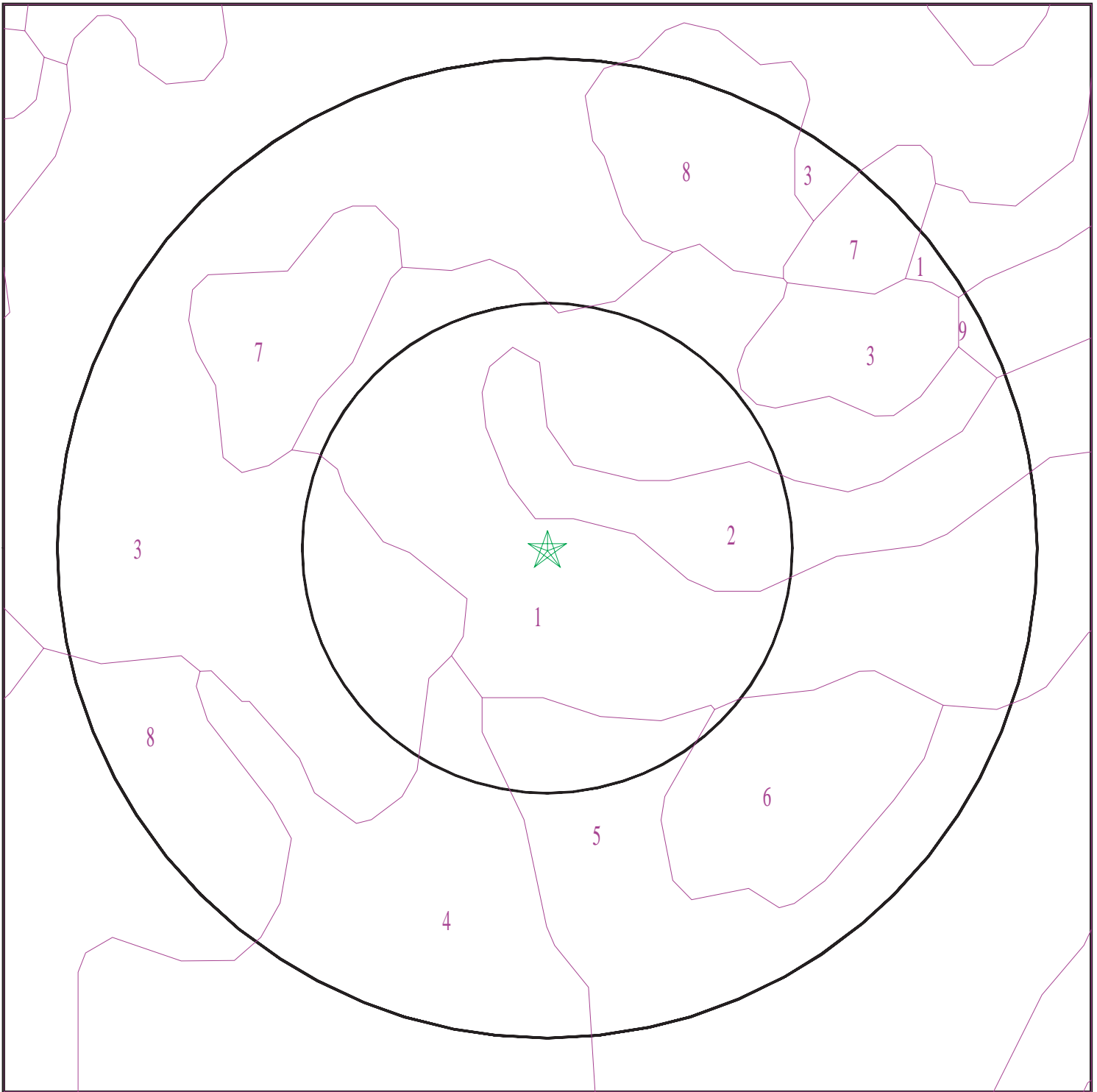
Era:	Paleozoic
System:	Devonian and Silurian
Series:	Devonian and Silurian
Code:	DSe (<i>decoded above as Era, System & Series</i>)

GEOLOGIC AGE IDENTIFICATION

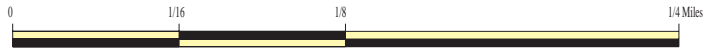
Category: Eugeosynclinal Deposits

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 4329842.2s



- ★ Target Property
- SSURGO Soil
- Water



SITE NAME: Burt Company
ADDRESS: 1 Cambridge Street
Portland ME 04103
LAT/LONG: 43.6877 / 70.2886

CLIENT: Sebago Technics, Inc.
CONTACT: Grant Austin
INQUIRY #: 4329842.2s
DATE: June 18, 2015 3:44 pm

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: BUXTON

Soil Surface Texture: silt loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 31 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14.11 Min: 1.41	Max: 6.5 Min: 4.5
2	9 inches	16 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay Soils.	Max: 4.23 Min: 0.42	Max: 7.3 Min: 5.1
3	16 inches	38 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay Soils.	Max: 1.41 Min: 0	Max: 7.3 Min: 5.1
4	38 inches	59 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Elastic silt.	Max: 1.41 Min: 0	Max: 7.3 Min: 5.6

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Map ID: 2

Soil Component Name: SCANTIC

Soil Surface Texture: silt loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Poorly drained

Hydric Status: All hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 15 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14.11 Min: 1.41	Max: 6.5 Min: 4.5
2	7 inches	27 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.41 Min: 0	Max: 7.3 Min: 5.1
3	27 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Elastic silt.	Max: 1.41 Min: 0	Max: 7.3 Min: 5.6

Soil Map ID: 3

Soil Component Name: HOLLIS

Soil Surface Texture: fine sandy loam

Hydrologic Group: Class C/D - Drained/undrained hydrology class of soils that can be drained and classified.

Soil Drainage Class: Somewhat excessively drained

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 38 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	5 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 42.34 Min: 14.11	Max: 6 Min: 3.6
2	5 inches	18 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 42.34 Min: 14.11	Max: 6 Min: 3.6
3	18 inches	22 inches	unweathered bedrock	Not reported	Not reported	Max: 141.14 Min: 0.07	Max: Min:

Soil Map ID: 4

Soil Component Name: DEERFIELD

Soil Surface Texture: loamy sand

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 69 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	loamy sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 141.14 Min: 42.34	Max: 6 Min: 3.6
2	9 inches	24 inches	loamy sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 705 Min: 141.14	Max: 6 Min: 4.5
3	24 inches	59 inches	sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 705 Min: 141.14	Max: 6 Min: 4.5

Soil Map ID: 5

Soil Component Name: CUT AND FILL LAND

Soil Surface Texture: very gravelly sandy loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 84 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	59 inches	very gravelly sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Gravels, Gravels with fines, Silty Gravel	Max: 141.14 Min: 0.42	Max: 7.8 Min: 4.5

Soil Map ID: 6

Soil Component Name: ROCK LAND

Soil Surface Texture: unweathered bedrock

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Excessively drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	59 inches	unweathered bedrock	Not reported	Not reported	Max: Min:	Max: Min:

Soil Map ID: 7

Soil Component Name: WALPOLE

Soil Surface Texture: fine sandy loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Poorly drained

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: All hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 23 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 42.34 Min: 14.11	Max: 6 Min: 4.5
2	7 inches	20 inches	fine sandy loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 42.34 Min: 14.11	Max: 6 Min: 4.5
3	20 inches	59 inches	gravelly loamy sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 141.14 Min: 42.34	Max: 6 Min: 4.5

Soil Map ID: 8

Soil Component Name: WINDSOR

Soil Surface Texture: loamy sand

Hydrologic Group: Class A - High infiltration rates. Soils are deep, well drained to excessively drained sands and gravels.

Soil Drainage Class: Somewhat excessively drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	5 inches	loamy sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 141.14 Min: 42.34	Max: 6 Min: 3.6
2	5 inches	25 inches	loamy sand	Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 141.14 Min: 42.34	Max: 6 Min: 4.5
3	25 inches	59 inches	gravelly sand	Granular materials (35 pct. or less passing No. 200), Fine Sand.	COARSE-GRAINED SOILS, Sands, Clean Sands, Poorly graded sand. COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 705 Min: 141.14	Max: 6.5 Min: 4.5

Soil Map ID: 9

Soil Component Name: BUXTON

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Moderately well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 61 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14.11 Min: 1.41	Max: 6.5 Min: 4.5
2	7 inches	16 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay Soils.	Max: 4.23 Min: 0.42	Max: 7.3 Min: 5.1
3	16 inches	38 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay Soils.	Max: 1.41 Min: 0	Max: 7.3 Min: 5.1
4	38 inches	59 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Elastic silt.	Max: 1.41 Min: 0	Max: 7.3 Min: 5.6

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
1	USGS40000420049	1/2 - 1 Mile North

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
2	USGS40000419942	1/2 - 1 Mile SE

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

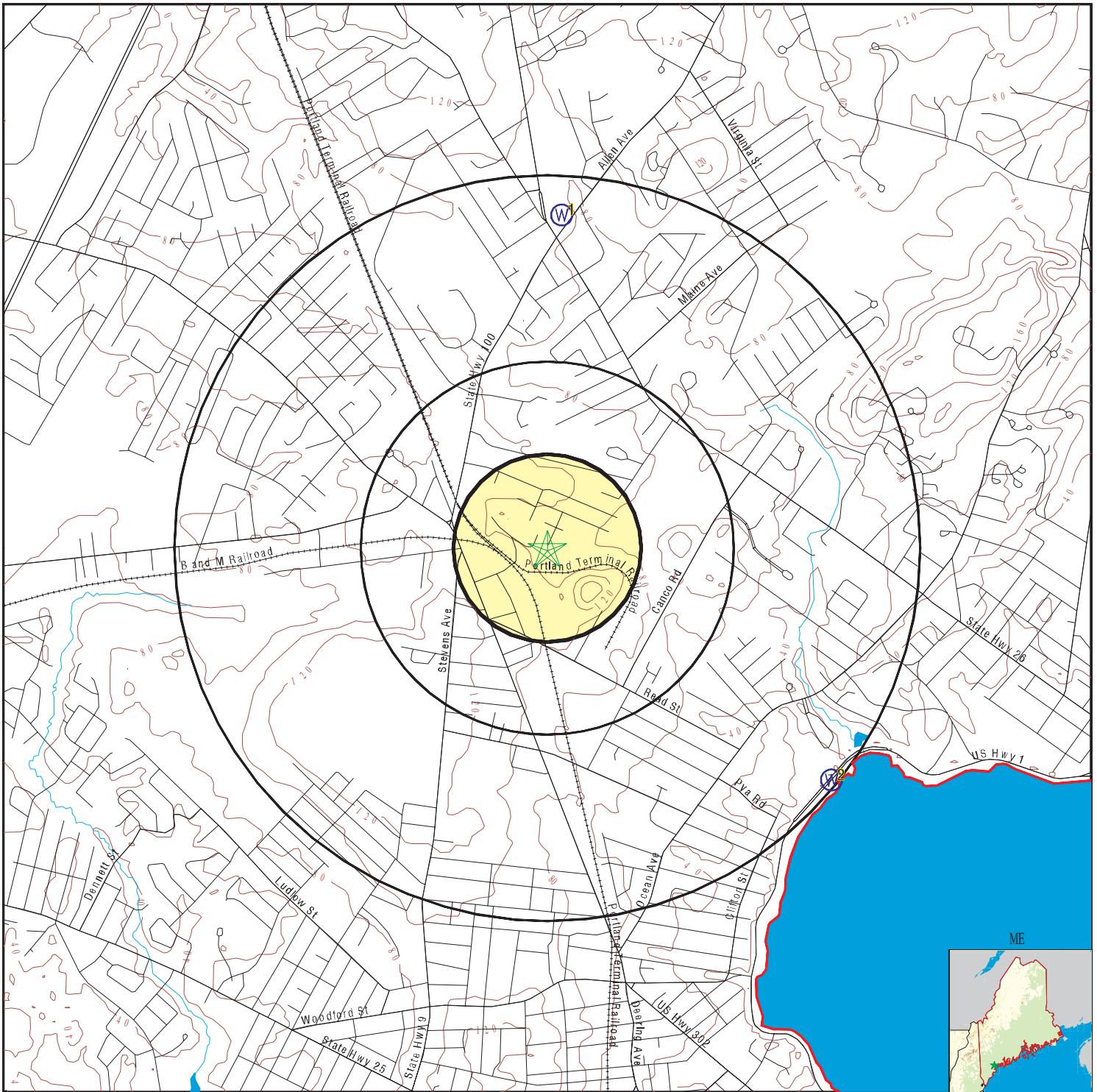
<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 4329842.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons

- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location



SITE NAME: Burt Company
 ADDRESS: 1 Cambridge Street
 Portland ME 04103
 LAT/LONG: 43.6877 / 70.2886

CLIENT: Sebago Technics, Inc.
 CONTACT: Grant Austin
 INQUIRY #: 4329842.2s
 DATE: June 18, 2015 3:44 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

Database

EDR ID Number

1

North
1/2 - 1 Mile
Lower

[Click here for full text details](#)

FED USGS

USGS40000420049

2

SE
1/2 - 1 Mile
Lower

[Click here for full text details](#)

FED USGS

USGS40000419942

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

State Database: ME Radon

Radon Test Results

Zip	City	Floor	Results
04103	Portland	B	1.1
04103	Portland	B	2.2
04103	Portland	B	7.6
04103	Portland	B	10.7
04103	Portland	B	10.7
04103	Portland	B	120.2
04103	Portland	B	1.4
04103	Portland	B	3.6
04103	Portland	B	2.9
04103	Portland	B	3.9
04103	Portland	B	5.4
04103	Portland	B	4.2
04103	Portland	B	2.4
04103	Portland	B	12.2
04103	Portland	B	6.8
04103	Portland	B	1.5
04103	Portland	B	4.2
04103	Portland	B	2.4
04103	Portland	B	12.2
04103	Portland	B	6.8
04103	Portland	B	1.5
04103	PORTLAND	B	2.2
04103	PORTLAND	B	2.4
04103		B	2.6
04103		B	0.8
04103		B	2.2
04103		B	0.4
04103		B	0.3
04103		B	0.4
04103		B	4.6
04103		B	4.5
04103		F	2.9
04103	Portland	B	1.7
04103	Portland	B	5.0
04103	Portland	B	11.4
04103	Portland	B	4.0
04103	Portland	B	12.9
04103	Portland	B	11.0
04103	Portland	B	1.5
04103	Portland	B	4.0
04103	Portland	B	0.9
04103	Portland	B	1.6
04103	Portland	B	0.9
04103	Portland	B	1.4
04103	PORTLAND	U	0.0
04103	Portland	B	2.1
04103			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

	Portland	B	1.9
04103	Portland	B	3.3
04103	PORTLAND	B	7.2
04103	PORTLAND	F	1.7
04103	PORTLAND	F	1.6
04103	Portland	B	2.3
04103	Portland	B	10.2
04103	Portland	B	5.9
04103	Portland	B	4.2
04103	Portland	B	2.3
04103	Portland	B	10.2
04103	Portland	B	5.9
04103	Portland	B	4.2
04103	Portland	B	1.1
04103	Portland	B	2.2
04103	Portland	B	7.6
04103		F	0.7
04103		B	1.5
04103		B	1.8
04103		F	4.3
04103		B	12.6
04103		B	12.6
04103		B	0.3
04103		B	13.4
04103		B	13.1
04103		B	13.4
04103		B	13.1
04103		B	0.8
04103		B	0.7
04103		B	4.2
04103		B	4.1
04103		F	3.4
04103		B	13.4
04103		B	13.2
04103		B	7.1
04103		F	4.0
04103		B	6.9
04103		B	5.2
04103		B	5.0
04103		F	1.8
04103		B	2.2
04103		B	2.5
04103	Portland	B	19.5
04103	Portland	B	2.3
04103	Portland	B	50.0
04103	Portland	B	19.5
04103	Portland	B	2.3
04103	Portland	B	50.0
04103		B	1.5
04103		B	8.1
04103		B	7.5
04103		B	1.3
04103		B	0.4
04103		U	0.1
04103		B	0.3
04103		B	1.2
04103			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

		B	1.0
04103		F	3.8
04103		F	3.8
04103		B	1.7
04103		F	0.8
04103		B	2.0
04103		B	2.3
04103	14456600		0.0
04103		B	2.9
04103		B	2.9
04103	Portland	B	0.9
04103	Portland	B	0.9
04103	Portland	B	2.9
04103		B	4.6
04103		F	1.2
04103		B	4.7
04103		B	7.6
04103		B	1.7
04103		B	15.6
04103		B	7.7
04103		B	18.6
04103		B	1.5
04103		B	0.7
04103		F	1.3
04103		F	1.0
04103		B	2.4
04103		B	2.2
04103		F	0.7
04103		F	0.6
04103	Portland	B	2.9
04103		B	1.2
04103	Portland	B	5.3
04103	Portland	B	5.0
04103	Portland	B	6.9
04103	Portland	B	2.7
04103	Portland	B	5.3
04103	Portland	B	5.0
04103	Portland	B	6.9
04103	Portland	B	2.7
04103	Portland	B	4.0
04103	Portland	B	2.1
04103	Portland	B	9.3
04103	Portland	B	4.0
04103	Portland	B	2.1
04103	Portland	B	9.3
04103	Portland	B	3.7
04103	Portland	B	2.8
04103	Portland	B	2.8
04103	10/16/02 0:00:00	4	921.2
04103	Portland	B	8.2
04103	Portland	B	8.2
04103	Portland	B	8.2
04103	Portland	B	8.2
04103	Portland	B	8.2
04103		U	0.8
04103			2.7
04103			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

	Portland	B	2.7
04103	Portland	B	1.5
04103	Portland	B	2.7
04103	Portland	B	1.5
04103		U	0.8
04103			2.7
04103	Portland	B	2.8
04103	Portland	B	2.8
04103	Portland	B	0.9
04103	Portland	B	2.3
04103	Portland	B	2.5
04103	Portland	B	2.4
04103	Portland	B	0.9
04103	Portland	B	2.3
04103	Portland	B	2.5
04103	Portland	B	2.4
04103		F	0.6
04103		B	3.5
04103		F	1.7
04103	Portland	B	2.6
04103	Portland	B	2.3
04103	Portland	B	7.6
04103	Portland	B	1.8
04103	Portland	B	2.6
04103	Portland	B	2.3
04103	Portland	B	7.6
04103	Portland	B	1.8
04103	Portland	B	2.9
04103	Portland	B	1.9
04103	Portland	B	3.3
04103	Portland	B	4.8
04103	Portland	B	4.7
04103	Portland	B	1.0
04103	Portland	B	1.4
04103	Portland	B	2.7
04103	Portland	B	2.9
04103	Portland	B	1.9
04103	Portland	B	3.3
04103	Portland	B	4.8
04103	Portland	B	4.7
04103	Portland	B	1.0
04103	Portland	B	1.4
04103	Portland	B	2.7
04103	Portland	B	1.5
04103	Portland	B	2.8
04103	Portland	B	8.0
04103	Portland	B	1.2
04103	Portland	B	1.5
04103	Portland	B	2.8
04103	Portland	B	16.0
04103	Portland	B	1.5
04103	Portland	B	5.4
04103	Portland	B	16.0
04103	Portland	B	1.5
04103	Portland	B	5.4
04103	Portland	B	3.4
04103			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

	Portland	B	5.2
04103	Portland	B	9.0
04103	Portland	B	4.0
04103	Portland	B	4.2
04103	Portland	B	3.4
04103	Portland	B	5.2
04103	Portland	B	9.0
04103	Portland	B	4.0
04103	Portland	B	4.2
04103		B	1.7
04103	Portland	B	2.0
04103	Portland	B	3.0
04103	Portland	B	3.0
04103	Portland	B	4.9
04103	Yarmouth	B	6.3
04103	Portland	B	0.9
04103	Portland	B	1.3
04103	Portland	B	2.3
04103		B	2.4
04103	Portland	B	2.0
04103	Portland	B	3.0
04103	Portland	B	3.0
04103	Portland	B	5.9
04103	Portland	B	4.2
04103	Portland	B	2.0
04103	Portland	B	5.9
04103	Portland	B	4.2
04103	Portland	B	2.0
04103		B	22.8
04103	Portland	B	8.0
04103	Portland	B	21.5
04103	Portland	B	6.5
04103	Portland	B	8.0
04103	Portland	B	21.5
04103	Portland	B	6.5
04103	Portland	B	10.3
04103	Portland	B	4.0
04103	Portland	B	6.9
04103	Portland	B	4.0
04103	Portland	B	6.9
04103	Portland	B	10.3
04103	Portland	B	4.1
04103	Portland	B	3.4
04103	Portland	B	4.9
04103	Yarmouth	B	6.3
04103	Portland	B	0.9
04103	Portland	B	1.3
04103	Portland	B	2.3
04103	Portland	B	4.1
04103	Portland	B	3.4
04103	Portland	B	1.9
04103	Portland	B	4.5
04103	Portland	B	0.6
04103	Portland	B	1.9
04103	Portland	B	4.5
04103	Portland	B	0.6

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

	Portland	B	6.4
04103	Portland	B	14.8
04103	Portland	B	31.3
04103	Portland	B	3.5
04103	Portland	B	1.8
04103	Portland	B	23.9
04103	Portland	B	4.6
04103	Portland	B	6.4
04103	Portland	B	14.8
04103	Portland	B	31.3
04103	Portland	B	3.5
04103	Portland	B	1.8
04103	Portland	B	23.9
04103	Portland	B	4.6
04103	Portland	B	8.0
04103	Portland	B	1.2

Federal EPA Radon Zone for CUMBERLAND County: 1

- Note: Zone 1 indoor average level > 4 pCi/L.
 : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
 : Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 04103

Number of sites tested: 12

<u>Area</u>	<u>Average Activity</u>	<u>% <4 pCi/L</u>	<u>% 4-20 pCi/L</u>	<u>% >20 pCi/L</u>
Living Area - 1st Floor	2.300 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	3.883 pCi/L	67%	33%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Inventory

Source: Office of Geographic Information Systems

Telephone: 207-287-6144

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Public Water Supply Wells Database

Source: Department of Human Services, Drinking Water Program

Telephone: 207-287-6196

There are 3 types of public water systems in Maine: Transient Systems; Community Systems and Non-transient Non-community Systems

OTHER STATE DATABASE INFORMATION

RADON

Maine Radon Test Results

Source: Department of Human Services

Telephone: 207-287-5698

The state of Maine Radiation Control Program's - Radon/Indor Air Quality Section's position on radon map, is that they should be used neither to predict the presence of high nor low values in any given geographic or geologic area. The only conclusion that should be drawn from this data is that radon is omnipresent in the soil gasses in the state of Maine, and therefore all residences and buildings that come in contact with the ground should be tested for radon.

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared in 1975 by the United State Geological Survey

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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Appendix C

Interview Documents

Initials: _____

**Sebago Technics, Inc.
AAI User Questionnaire**

Site Location: 0 Cornell St., Portland, ME (Tax Map 151A-A-13)

In order to receive CERCLA liability protection, the *user*¹ must provide the following information (if available). Failure to provide this information could result in the determination that “all appropriate inquiry” was not complete.

1. **Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25).**
Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law?

 Yes
 No
 Unknown

2. **Activity and land use limitations (AULs) that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26).**
Are you aware of any AULs, such as engineering controls, land use restrictions, or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

 Yes
 No
 Unknown

3. **Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).**
As the user of this ESA, do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

 Yes
 No
 Unknown

4. **Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).**
Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?

 Yes
 No
 Unknown

¹ the party seeking to complete an AAI to receive CERCLA liability protection

5. **Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).**

Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as user,


- (a) Do you know the past uses of the property?
- (b) Do you know of specific chemicals that are present or once were present at the property?
- (c) Do you know of spills or other chemical releases that have taken place at the property?
- (d) Do you know of any environmental cleanups that have taken place at the property?

- Yes
- No
- Unknown

6. **The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).**

As the user of this ESA, based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?

- Yes - See attached Brownfield Site Assessment Report of 2/24/1999.
- No
- Unknown



7/1/2015

DATE

SIGNATURE

Name: Gregory A. Mitchell
Title: Economic Development Director
Company: Economic Development Director

Appendix D

Historical Research Documents

This page contains a detailed description of the Parcel ID you selected.

[New Search!](#)

Current Owner Information:

<p>Services</p> <hr/> <p>Applications</p> <p>Doing Business</p> <p>Maps</p> <p>Tax Relief</p> <p>Tax Roll</p> <p>Q & A</p> <hr/> <p>browse city services a-z</p> <hr/> <p>browse facts and links a-z</p> <hr/>	<p>CBL 151A A013001</p> <p>Land Use Type GOVERNMENTAL Verify legal use with Inspections Division</p> <p>Property Location 0 CORNELL ST</p> <p>Owner Information CITY OF PORTLAND 389 CONGRESS ST PORTLAND ME 04101</p> <p>Book and Page NCFY03/</p> <p>Legal Description 151A-A-13 R MORRILL ST</p> <hr/> <p>135227 SF</p> <p>Acres 3.1044</p>
---	---

Current Assessed Valuation:



Best viewed at 800x600, with Internet Explorer

<p>TAX ACCT NO.</p> <p>LAND VALUE</p> <p>BUILDING VALUE</p> <p>PORTLAND, CITY OF</p> <p>NET TAXABLE - REAL ESTATE</p>	<p>No Tax Information Available at This Time</p> <p>\$377,600.00</p> <p>\$0.00</p> <p>(\$377,600.00)</p> <p>\$0.00</p>	<p>OWNER OF RECORD AS OF APRIL 2014</p> <p>CITY OF PORTLAND</p> <p>389 CONGRESS ST PORTLAND ME 04101</p>
--	--	---

TAX AMOUNT

Any information concerning tax payments should be directed to the Treasury office at 874-8490 or [e-mailed](#).

Building Information:

	Building 0
Year Built	
Style/Structure Type	GOVERNMENTAL

Sales Information:

Sale Date	Type	Price	Book/Page
4/1/2003	LAND + BUILDING	\$0.00	NCFY03/
5/6/1988	LAND + BUILDING	\$0.00	8279/185

[New Search!](#)



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

September 24, 1998

Bill Tracey
City of Portland
City Hall, 389 Congress Street
Portland, Maine 04101 - 3503

RE: 1 Cambridge Street (AKA Burt Company)
Demolition of Existing Structures

Dear Mr. Tracey:

This letter is in reference to the property in the City of Portland located at 1 Cambridge Street, this property also being referred to as the "Burt Company Site". This property was designated by the State as an Uncontrolled Hazardous Substance Site on April 12, 1991, and was the location of a Department initiated removal action of hazardous substances around that same time. Since the time of the removal action the property has sat idle, and has been the location of at least one fire. The lack of access control and idleness has made the buildings on the property an attractive nuisance, and the poor condition of the structures from the fire and lack of maintenance have made them a public health hazard. It is the current understanding of the Department that the property has been abandoned by the owner through bankruptcy proceedings, and that the City, in the interest of public safety, desires to demolish the existing structures on Site. However, the City is apprehensive in conducting this activity for fear of potential liability regarding hazardous substance issues at the property.

The Department is in agreement that the structures that exist on site are a public nuisance, and should be demolished as soon as possible. It is also the understanding of the Department that the City has never owned or operated the Site, and that any control or ownership the City would have of the Site would be through tax delinquency proceedings or abandonment. Section 38 M.R.S.A. Section 1367-B states:

"Liability under section 1367 does not apply to the State or any political subdivisions that acquired ownership or control of an uncontrolled hazardous substance site through tax delinquency proceedings pursuant to Title 36, or through any similar statutorily created procedure for the collection of governmental taxes, assessments, expenses or charges, or involuntarily through abandonment, or in circumstances in which the State or political subdivision involuntarily acquired ownership or control by

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04301-0017
(207) 287-6686
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4370 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6300

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

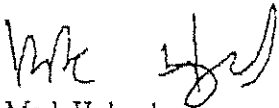
virtue of its function as a sovereign. The exemption from liability provided under this subsection does not apply to the State or any political subdivision that has caused, contributed to or exacerbated a release or threatened release of a hazardous substance on or from the uncontrolled site."

Therefore, in accordance with 38 M.R.S.A. Section 1367-B, the Department would not consider the City liable for the current hazardous substance contamination in the soil and groundwater at the Site, even if the City proceeded with demolition of the existing structures on Site. However, if a spill or release of hazardous substances occurred during demolition of the buildings, such as fuel oil spill from a heating oil tank or a release of asbestos, the City would be required to mitigate this release.

A removal action of hazardous substances was conducted by the Department in 1992; therefore no drums, tanks or containers of hazardous substances stemming from previous manufacturing activities should currently exist on Site. However, the City should take care during demolition since the possibility of encountering fuel oil tanks as well as containers of hazardous substances illegally dumped on site since 1992 exist. Since the Department is anxious to see the City undertake this activity, we are willing to provide personnel to be either on site or on call during demolition to provide guidance if such material is encountered, provided the scheduling of this action is conducted at a mutually convenient time.

I hope this letter addresses the concerns the City has regarding its' liability at the site. However if you have any questions at all regarding this or any other matters at the Site, please feel free to call Brian Beneski of my staff at 287 - 4858 directly or myself at 287 - 7673.

Sincerely,



Mark Hyland
Director, Division of Remediation

CC: Brian Beneski, MEDEP



TOTAL P. 03

THIS IS NOT A PERMIT/CONSTRUCTION CANNOT COMMENCE UNTIL THE PERMIT IS ISSUED

**Building or Use Permit Pre-Application
Attached Single Family Dwellings/Two-Family Dwelling
Multi-Family or Commercial Structures and Additions Thereto**

In the interest of processing your application in the quickest possible manner, please complete the information below for a Building or Use Permit.

NOTEIf you or the property owner owes real estate or personal property taxes or user charges on ANY PROPERTY within the City, payment arrangements must be made before permits of any kind are accepted.**

Location/Address of Construction (include Portion of Building): <u>1 CAMBRIDGE STREET, PORTLAND, ME / CORNELL ST</u>			
Total Square Footage of Proposed Structure		Square Footage of Lot	
Tax Assessor's Chart, Block & Lot Number Chart# <u>151A</u> Block# <u>A</u> Lot# <u>013</u>	Owner: <u>CITY</u>	Telephone#:	
Owner's Address:	Lessee/Buyer's Name (If Applicable)	Cost Of Work: <u>\$55,230</u>	Fee: <u>\$295</u>
Proposed Project Description:(Please be as specific as possible) <u>DEMOLISH BUILDINGS</u>			
Contractor's Name, Address & Telephone <u>WM. A. RENAUD, JR. TRUCKING, INC, 119 KNIGHTS POND ROAD, SOUTH BERWICK, ME 03908</u>		<u>207-384-5111</u>	Rec'd By <u>M.A.</u>
Current Use: <u>VACANT / COMM</u>		Proposed Use: <u>VACANT LAND</u>	

Separate permits are required for Internal & External Plumbing, HVAC and Electrical installation.

- All construction must be conducted in compliance with the 1996 B.O.C.A. Building Code as amended by Section 6-Art II.
- All plumbing must be conducted in compliance with the State of Maine Plumbing Code.
- All Electrical Installation must comply with the 1996 National Electrical Code as amended by Section 6-Art III.
- HVAC (Heating, Ventilation and Air Conditioning) installation must comply with the 1993 BOCA Mechanical Code.

You must include the following with you application:

- 1) A Copy of Your Deed or Purchase and Sale Agreement
- 2) A Copy of your Construction Contract, if available
- 3) A Plot Plan/Site Plan

Minor or Major site plan review will be required for the above proposed projects. The attached checklist outlines the minimum standards for a site plan.

4) Building Plans

Unless exempted by State Law, construction documents must be designed by a registered design professional.

A complete set of construction drawings showing all of the following elements of construction:

- Cross Sections w/Framing details (including porches, decks w/ railings, and accessory structures)
- Floor Plans & Elevations
- Window and door schedules
- Foundation plans with required drainage and dampproofing
- Electrical and plumbing layout. Mechanical drawings for any specialized equipment such as furnaces, chimneys, gas equipment, HVAC equipment (air handling) or other types of work that may require special review must be included.

Certification

I hereby certify that I am the Owner of record of the named property, or that the proposed work is authorized by the owner of record and that I have been authorized by the owner to make this application as his/her authorized agent. I agree to conform to all applicable laws of this jurisdiction. In addition, if a permit for work described in this application is issued, I certify that the Code Official's authorized representative shall have the authority to enter all areas covered by this permit at any reasonable hour to enforce the provisions of the codes applicable to this permit.

Signature of applicant: <u>William A. Renaud, Jr.</u>	Date: <u>01-21-99</u>
--	--------------------------

Building Permit Fee: \$25.00 for the 1st \$1000.cost plus \$5.00 per \$1,000.00 construction cost thereafter.
Additional Site review and related fees are attached on a separate addendum

CALL FOR P/U 384-5111

LAND USE - ZONING REPORT

ADDRESS: 1 Cambridge & Cornell St DATE: 2/1/99

REASON FOR PERMIT: Demolish buildings

BUILDING OWNER: City of Portland C-B-L: 151A-A-13

PERMIT APPLICANT: William A. Renaud, Jr.

APPROVED: With Conditions DENIED: _____
#10

CONDITION(S) OF APPROVAL

1. During its existence, all aspects of the Home Occupation criteria, Section 14-410, shall be maintained.
 2. The footprint of the existing _____ shall not be increased during maintenance reconstruction.
 3. All the conditions placed on the original, previously approved, permit issued on _____ are still in effect for this amendment.
 4. Your present structure is legally nonconforming as to rear and side setbacks. If you were to demolish the building on your own volition, you will **not** be able to maintain these same setbacks. Instead you would need to meet the zoning setbacks set forth in today's ordinances. In order to preserve these legally non-conforming setbacks, you may only rebuild the _____ in place and in phases.
 5. This property shall remain a single family dwelling. Any change of use shall require a separate permit application for review and approval.
 6. Our records indicate that this property has a legal use of _____ units. Any change in this approved use shall require a separate permit application for review and approval.
 7. Separate permits shall be required for any signage.
 8. Separate permits shall be required for future decks, sheds, pool(s), and/or garage.
 9. This is **not** an approval for an additional dwelling unit. You **shall not** add any additional kitchen equipment, such as stoves, microwaves, refrigerators, or kitchen sinks, etc.
- Other requirements of condition This demolition area shall be ^{graded,} loamed

10

And Seeded. Any change of use, such as parking, shall require a separate permit application for site plan review and zoning review. And approvals

Marge Schmuckal Marge Schmuckal, Zoning Administrator
City of Portland

City of Portland, Maine - Building or Use Permit Application 389 Congress Street, 04101, Tel: (207) 874-8703, FAX: 874-8716

Location of Construction: 1 Cambridge St/Cornell St		Owner: City of Portland		Phone:		Permit No: 99007
Owner Address:		Lessee/Buyer's Name:		BusinessName:		
Contractor Name: Wm. A Renaud Jr., Trucking		Address: 119 Knighs Pond Rd S. Berwick 03908		Phone: *384-5111		<div style="border: 2px solid black; padding: 5px; text-align: center;"> PERMIT ISSUED FEB 2 1999 CITY OF PORTLAND </div>
Past Use: Vacant/Commercial		Proposed Use: Vacant Land		COST OF WORK: \$ 55,230 PERMIT FEE: \$ 295.00		
Proposed Project Description: Demolish Buildings		FIRE DEPT. <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Denied		INSPECTION: Use Group: Type: Signature: <i>[Signature]</i>		Zone: CBL: 151A-A-013 Zoning Approval: <i>[Signature]</i> Special Zone or Reviews: <input type="checkbox"/> Shoreland <input type="checkbox"/> Wetland <input type="checkbox"/> Flood Zone <input type="checkbox"/> Subdivision <input type="checkbox"/> Site Plan maj <input type="checkbox"/> minor <input type="checkbox"/> Imm <input type="checkbox"/>
		PEDESTRIAN ACTIVITIES DISTRICT (P.A.D.) Action: Approved <input type="checkbox"/> Approved with Conditions: <input type="checkbox"/> Denied <input type="checkbox"/>		Signature: <i>[Signature]</i> Date:		
Permit Taken By: MG		Date Applied For: January 26, 1999				

1. This permit application does not preclude the Applicant(s) from meeting applicable State and Federal rules.
2. Building permits do not include plumbing, septic or electrical work.
3. Building permits are void if work is not started within six (6) months of the date of issuance. False information may invalidate a building permit and stop all work..

CERTIFICATION

I hereby certify that I am the owner of record of the named property, or that the proposed work is authorized by the owner of record and that I have been authorized by the owner to make this application as his authorized agent and I agree to conform to all applicable laws of this jurisdiction. In addition, if a permit for work described in the application is issued, I certify that the code official's authorized representative shall have the authority to enter all areas covered by such permit at any reasonable hour to enforce the provisions of the code(s) applicable to such permit

SIGNATURE OF APPLICANT _____ ADDRESS: _____ DATE: January 26, 1999 PHONE: _____

RESPONSIBLE PERSON IN CHARGE OF WORK, TITLE _____ PHONE: _____
 White-Permit Desk Green-Assessor's Canary-D.P.W. Pink-Public File Ivory Card-Inspector

Zoning Appeal

Variance
 Miscellaneous
 Conditional Use
 Interpretation
 Approved
 Denied

Historic Preservation

Not in District or Landmark
 Does Not Require Review
 Requires Review

Action:

Approved
 Approved with Conditions
 Denied

Date: *[Signature]*

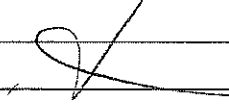
CEO DISTRICT 2
KIEKX
KC/IM

COMMENTS

1/28/99 Founding Begins w/ Joe Smith - This guy is a contractor or plumber
See Illinois instructions on page of Highway materials

2/12/99 - Bldg demo'd - ~~site~~ site filled in -
rough graded & adding seed & hay while on site.

Met w/ Marge & Contractor to discuss if req. #10
is ok. - she said complied w/ her requirements.



Type	Inspection Record	Date
Foundation:	_____	_____
Framing:	_____	_____
Plumbing:	_____	_____
Final:	_____	_____
Other:	_____	_____



Burt Company

1 Cambridge Street
Portland, ME 04103

Inquiry Number: 4329842.3

June 18, 2015

Certified Sanborn® Map Report



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

6/18/15

Site Name:

Burt Company
1 Cambridge Street
Portland, ME 04103

Client Name:

Sebago Technics, Inc.
75 John Roberts Road, Suite
SOUTH POTRLAND, ME



EDR Inquiry # 4329842.3

Contact: Grant Austin

The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Sebago Technics, Inc. were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Site Name: Burt Company
Address: 1 Cambridge Street
City, State, Zip: Portland, ME 04103
Cross Street:
P.O. # 15056
Project: Former Burt Company Site
Certification # F57B-4A3D-86C7



Sanborn® Library search results
Certification # F57B-4A3D-86C7

Maps Provided:

1988
1980
1971
1954

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

The Sanborn Library LLC Since 1866™

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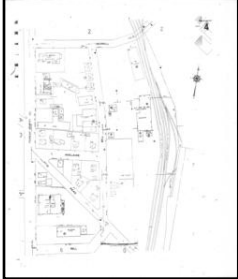
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Sanborn Sheet Thumbnails

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



1988 Source Sheets



Volume 2, Sheet 4

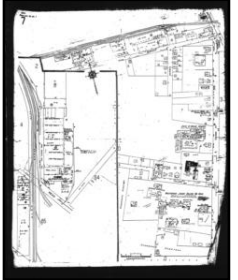


Volume 2, Sheet 7



Volume 2, Sheet 2

1980 Source Sheets



Volume 2, Sheet 7



Volume 2, Sheet 2

1971 Source Sheets



Volume 2, Sheet 4



Volume 2, Sheet 7



Volume 2, Sheet 2

1954 Source Sheets




Volume 2, Sheet 2

1988 Certified Sanborn Map

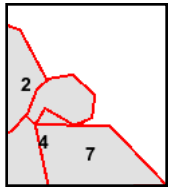
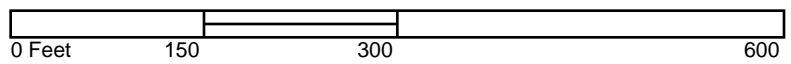
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Certification # F57B-4A3D-86C7

Site Name:	Burt Company
Address:	1 Cambridge Street
City, ST, ZIP:	Portland ME 04103
Client:	Sebago Technics, Inc.
EDR Inquiry:	4329842.3
Order Date:	6/18/2015 8:57:02 PM
Certification #	F57B-4A3D-86C7
Copyright:	1988



This Certified Sanborn Map combines the following sheets. Outlined areas indicate map sheets within the collection.

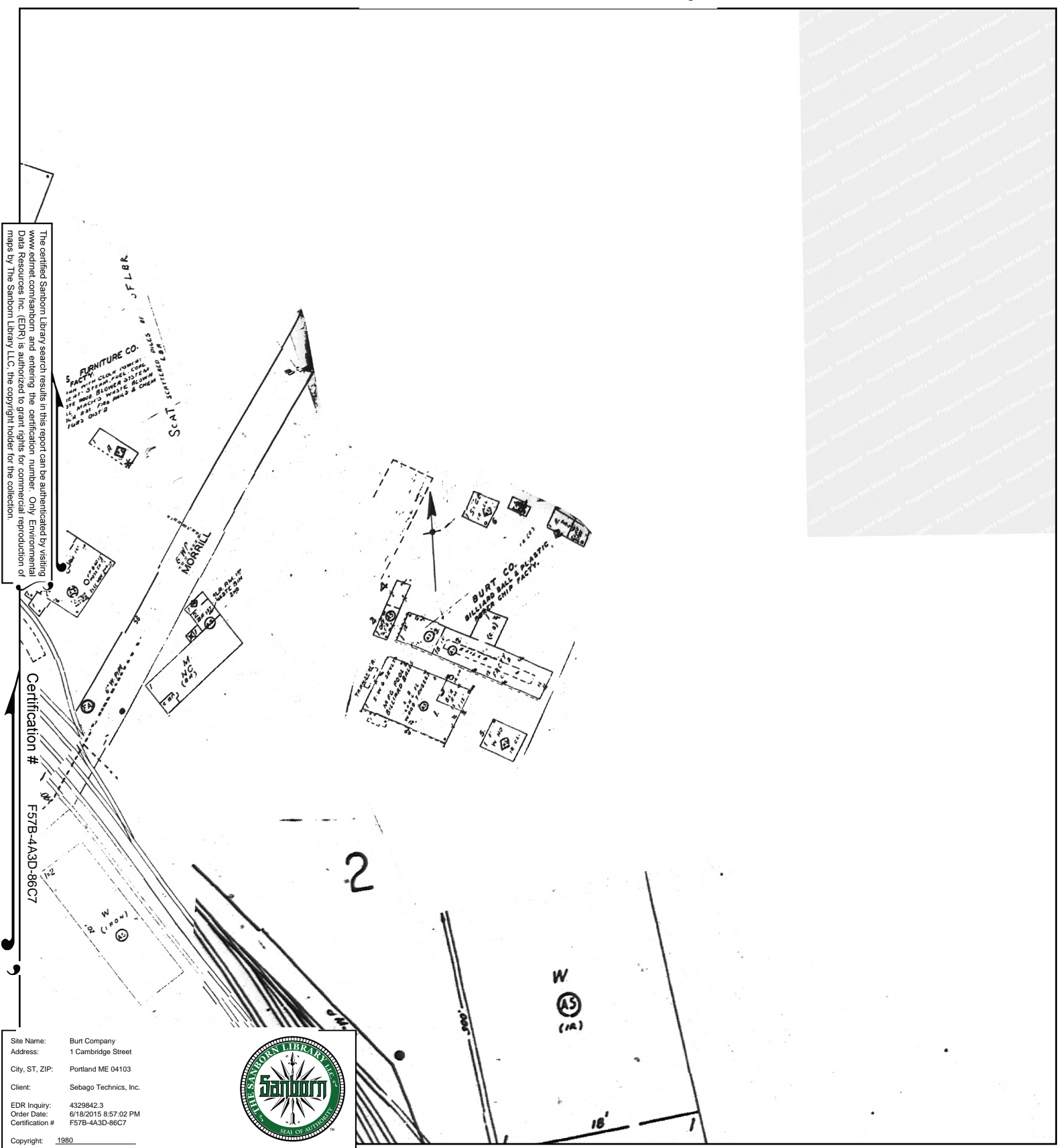


- Volume 2, Sheet 4
- Volume 2, Sheet 7
- Volume 2, Sheet 2



1980 Certified Sanborn Map

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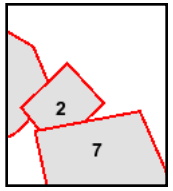
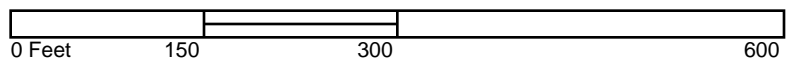


Certification # F57B-4A3D-86C7

Site Name: Burt Company
 Address: 1 Cambridge Street
 City, ST, ZIP: Portland ME 04103
 Client: Sebago Technics, Inc.
 EDR Inquiry: 4329842.3
 Order Date: 6/18/2015 8:57:02 PM
 Certification # F57B-4A3D-86C7
 Copyright: 1980



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Volume 2, Sheet 7
 Volume 2, Sheet 2



1971 Certified Sanborn Map

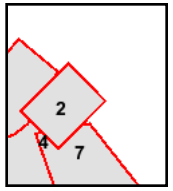
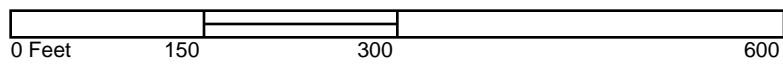
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Certification #
F57B-4A3D-86C7

Site Name: Burt Company
 Address: 1 Cambridge Street
 City, ST, ZIP: Portland ME 04103
 Client: Sebago Technics, Inc.
 EDR Inquiry: 4329842.3
 Order Date: 6/18/2015 8:57:02 PM
 Certification #: F57B-4A3D-86C7
 Copyright: 1971



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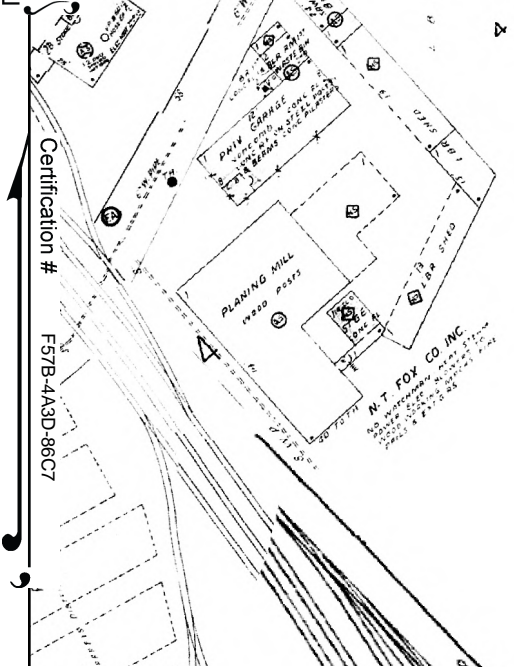


Volume 2, Sheet 4
 Volume 2, Sheet 7
 Volume 2, Sheet 2



1954 Certified Sanborn Map

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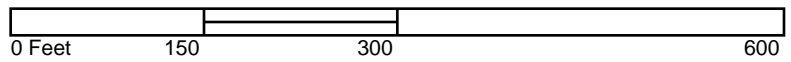
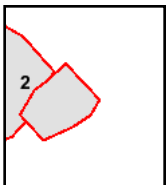


Certification # F57B-4A3D-86C7

Site Name: Burt Company
 Address: 1 Cambridge Street
 City, ST, ZIP: Portland ME 04103
 Client: Sebago Technics, Inc.
 EDR Inquiry: 4329842.3
 Order Date: 6/18/2015 8:57:02 PM
 Certification #: F57B-4A3D-86C7



Volume 2, Sheet 2





Burt Company

1 Cambridge Street
Portland, ME 04103

Inquiry Number: 4329842.5

June 19, 2015

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

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Date EDR Searched Historical Sources:

Aerial Photography June 19, 2015

Target Property:

1 Cambridge Street

Portland, ME 04103

<u><i>Year</i></u>	<u><i>Scale</i></u>	<u><i>Details</i></u>	<u><i>Source</i></u>
1956	Aerial Photograph. Scale: 1"=500'	Flight Date: May 17, 1956	EDR
1960	Aerial Photograph. Scale: 1"=1000'	Flight Date: June 27, 1960	EDR
1970	Aerial Photograph. Scale: 1"=500'	Flight Date: May 21, 1970	EDR
1975	Aerial Photograph. Scale: 1"=1000'	Flight Date: April 30, 1975	EDR
1987	Aerial Photograph. Scale: 1"=500'	Flight Date: May 14, 1987	USGS
1992	Aerial Photograph. Scale: 1"=500'	Flight Date: June 12, 1992	USGS
1997	Aerial Photograph. Scale: 1"=500'	DOQQ - acquisition dates: June 07, 1997	USGS/DOQQ
2003	Aerial Photograph. Scale: 1"=500'	Flight Date: May 04, 2003	EDR
2006	Aerial Photograph. Scale: 1"=500'	Flight Year: 2006	USDA/NAIP
2007	Aerial Photograph. Scale: 1"=500'	Flight Year: 2007	USDA/NAIP
2009	Aerial Photograph. Scale: 1"=500'	Flight Year: 2009	USDA/NAIP
2011	Aerial Photograph. Scale: 1"=500'	Flight Year: 2011	USDA/NAIP

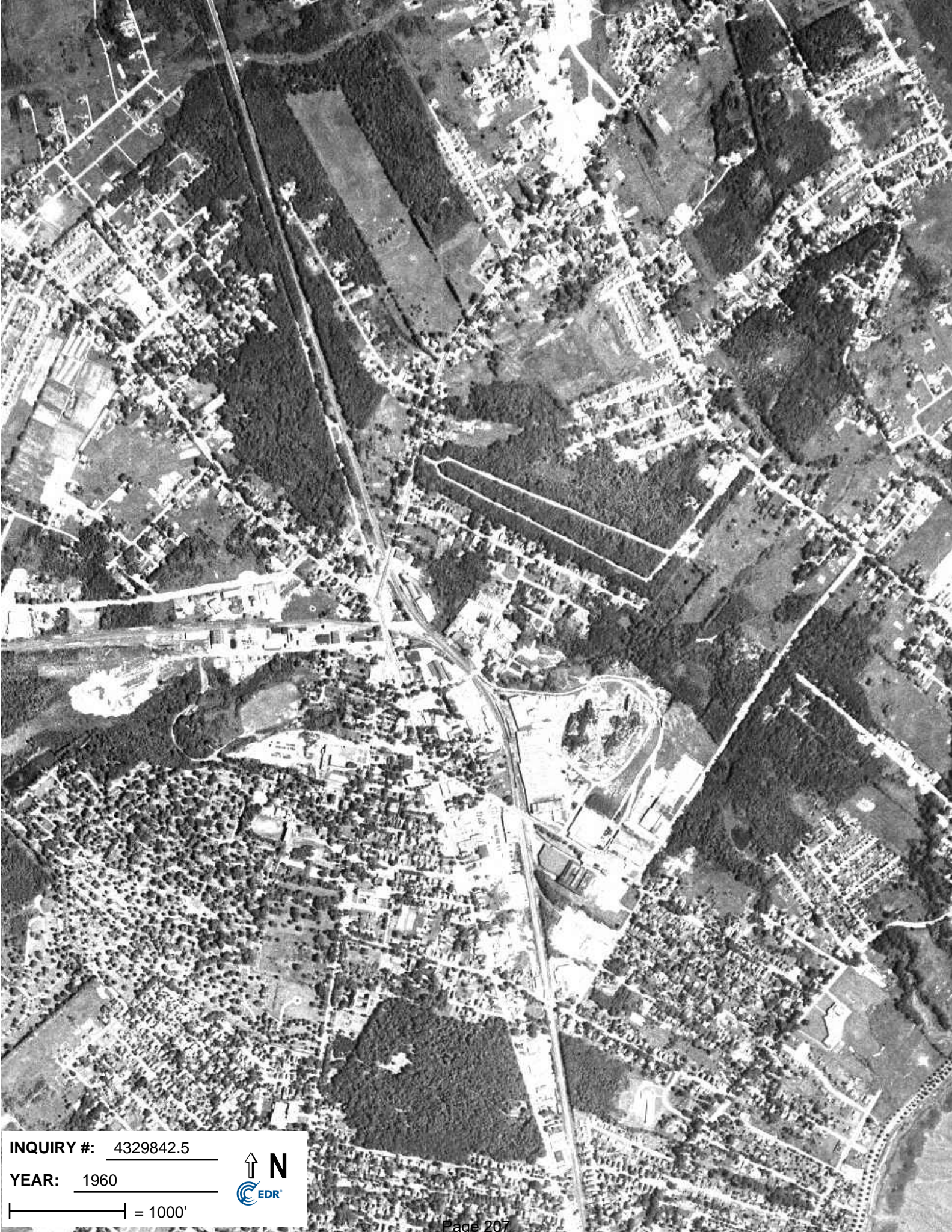


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YEAR: 1956

| = 500'





INQUIRY #: 4329842.5

YEAR: 1960

| = 1000'





INQUIRY #: 4329842.5

YEAR: 1970

| = 500'





INQUIRY #: 4329842.5

YEAR: 1975

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YEAR: 1987

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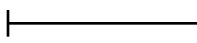
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INQUIRY #: 4329842.5

YEAR: 2006

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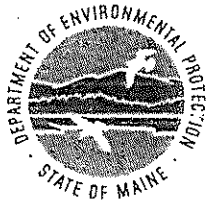
YEAR: 2007

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Appendix E

Burt Company Environmental Documents



IN THE MATTER OF

BURT COMPANY SITE)
Portland, Cumberland County, Maine) DESIGNATION OF
PROCEEDING UNDER 38 M.R.S.A.) UNCONTROLLED HAZARDOUS
SECTION 1365, UNCONTROLLED) SUBSTANCE SITE
HAZARDOUS SUBSTANCE SITES) AND ADMINISTRATIVE
ORDER

Jurisdiction

This Designation of Uncontrolled Hazardous Substance Site is made pursuant to the authority vested in the Commissioner of Environmental Protection ("Commissioner") under the Uncontrolled Hazardous Substance Sites Law, 38 M.R.S.A. Sections 1361-1371.

Findings of Fact

1. The Burt Company Site, hereinafter sometimes referred to as the "Site" or as the "facility", refers to a parcel of land having a surface area of approximately 3.1 acres and any structures or improvements thereon, located in Portland, Maine. It includes the property owned by Norman S. Reef and Raymond H. Reef, trustees of the R.F. Investment Trust, identified as lot 13A on the City of Portland Tax Map 151A on file in the municipal offices. The Site is depicted in Attachment 1 which is attached hereto and made a part of this Designation.
2. The Burt Company Site is situated on the northeast side of the City of Portland. The Site is located in a mixed use (residential and commercial) urban area. DEP personnel have observed unrestricted access to the site and that children play in the area.
3. The Site is the location of the former Burt Company. Prior to July of 1985, the Burt Company was owned and operated by Arthur Girard. The facility manufactured pool balls and poker chips. Lead monosilicate and various dyes were used in the manufacturing processes.
4. On July 15, 1985, John M. Kendall and Sherman B Kendall purchased the Burt Company. Lead monosilicate and various dyes were located at the site at the time of purchase. John M. Kendall operated the company under the assumed name Brothers Corporation until the fall of 1988.

5. In November of 1988, the Burt Company was reorganized as CHIPCO International, Inc.. Subsequently certain manufacturing assets were sold to Arthur Girard and James Blanchard of Atlantic Molding, Inc. for use at a facility located on Warren Avenue in Portland. CHIPCO moved its operations to Windham, where it manufactures poker chips as JOM, Inc. d/b/a CHIPCO International Ltd..
6. On May 6, 1988 Norman S. Reef and Raymond H. Reef, trustees of R.F. Investment trust purchased the Burt Company Site from John M. Kendall and Sherman B. Kendall. At this time, the lead monosilicate and various dyes were still located on the Site.
7. Two fires occurred at the Burt Company Site, one in December of 1989 and a second in March of 1990. Around this time bags of lead monosilicate and dyes were torn and scattered across the site by vandals. Additionally, unknown and potentially hazardous materials are present in the basement of a burned building on the site.
8. The lead monosilicate and various dyes referred to in paragraphs 4, 5, 6 and 7 were stored or disposed of in such a manner that they have been or are being discharged into the environment at, beneath or adjacent to the Site.
9. On March 27, 1990, the Maine Department of Environmental Protection gathered soil samples for analysis from areas where the lead monosilicate and dyes were spilled. The samples were found to contain the following hazardous substances:

Compound	Maximum Reported Concentration parts per million (ppm) EP Toxic
Barium	3600
Lead	7700

The Maine DEP has established that materials may be identified as hazardous waste by characteristics of EP Toxicity (38 M.R.S.A. Section 1301). The following concentrations are the minimum concentrations of contaminants for characteristic of EP toxicity.

Compound	Minimum Concentration for EP Toxicity parts per million (ppm) EP Toxic
Barium	100
Lead	5.0

10. The compounds identified in paragraph 7 exhibit the following characteristics and pose a threat to the public health or safety or to the environment in the event that they are released into the environment:

A. Barium

Barium is an extremely reactive metal that decomposes in water. Soluble forms are acutely toxic. Poisoning from soluble forms produces a strong, prolonged stimulant action on muscle tissue. Accidental ingestion of soluble barium salts has resulted in gastroenteritis, muscle paralysis, and ventricular fibrillation and extra systoles.

(Source: Chemical, Physical, and Biological Properties of Compounds Present at Hazardous Waste Sites, prepared for the USEPA by Clement Associates, Inc., Arlington, Virginia, September 27, 1985)

Barium is identified as a hazardous waste and is assigned the Hazardous Waste Number D005 under the Department's Hazardous Waste Management Rules.

B. Lead

Lead is a heavy metal. It is a reproductive hazard and also adversely affects the brain and central nervous system by causing encephalopathy and peripheral neuropathy. Chronic exposure to low levels of lead can cause subtle learning disabilities in children. Exposure to lead can also cause kidney damage and anemia, and may have adverse effects on the immune system.

(Source: Chemical, Physical, and Biological Properties of Compounds Present at Hazardous Waste Sites, prepared for the USEPA by Clement Associates, Inc., Arlington, Virginia, September 27, 1985)

Lead is identified as a hazardous waste and is assigned the Hazardous Waste Number D008 under the Department's Hazardous Waste Management Rules.

11. MEDEP has twice notified Norman Reef by certified letter of requirements for cleanup.

A. On April 17, 1990, MEDEP Division of Response Services sent a certified letter to Norman Reef requesting that the site be secured and that he sample, identify, remove, and dispose of the waste material in a manner acceptable to the Department. The letter stated that if a response was not made within 48 hours the MEDEP would initiate cleanup and the owner would be held liable for the costs incurred during such a cleanup.

The letter was accepted but the requested action was not taken by Norman Reef.

- B. On September 17, 1990, the MEDEP Bureau of Oil and Hazardous Materials Control, Division of Licensing and Enforcement sent a certified letter to Norman Reef requesting reimbursement for costs incurred by the containment operation and requesting proper disposal of the drums remaining on the site. The letter was accepted but to date Norman Reef has not complied with the request and has not indicated that he intends to.
12. LRS Environmental was contracted by the MEDEP to contain the hazards present at the Site and completed containment operations at the site in May of 1990. The hazardous substances remained at the site.
13. On January 14, 1991 The MEDEP Division of Licensing and Enforcement referred the case to the Division of Site Investigation and Remediation for further action.
14. On April 4 1991, John M. Kendall removed potentially hazardous substances from the site and disposed of them in a reckless manner.
15. 38 M.R.S.A. Section 1362(1) defines "hazardous substance" as:
- A. Any substance identified by the Board of Environmental Protection under [38 M.R.S.A.] Section 1319-0 [hazardous waste];
 - B. Any substance identified by the Board under [38 M.R.S.A.], Section 1319 [hazardous matter];
 - C. Any substance designated pursuant to the United States Comprehensive Environmental Response, Compensation and Liability Act of 1980, Public Law 96-510, Sections 101 and 102 [Superfund];
 - D. Any toxic pollutant listed under the United States Federal Water Pollution Control Act, Section 307(a);
 - E. Any hazardous air pollutant listed under the United States Clean Air Act, Section 112;
 - F. Any imminently hazardous chemical substance or mixture with respect to which the Administrator of the United States Environmental Protection Agency has taken action pursuant to the United States Toxic Substances Control Act, Section 7; and
 - G. Waste oil as defined in [38 M.R.S.A.], Section 1303.

16. The substances listed in paragraph 9 have been designated as hazardous wastes by the Board of Environmental Protection pursuant to 38 M.R.S.A. Section 1319-0. They are, accordingly, hazardous substances within the meaning of 38 M.R.S.A. Section 1362. These substances arrived at the site prior to July 15, 1985. These substances are being, or have been, stored, spilled, or disposed of at the site in such a manner that they have been or are being released or discharged into the soil.
17. 38 M.R.S.A. Section 1362(2) defines "responsible party" as one or more of the following persons:
 - A. The owner or operator of the uncontrolled site;
 - B. Any person who owned or operated the uncontrolled site from the time any hazardous substance arrived there;
 - C. Any person who arranged for the transport or handling of a hazardous substance, provided that the hazardous substance arrived at the uncontrolled site; and
 - D. Any person who accepted a hazardous substance for transport, provided that the substance arrived at the uncontrolled site.

Based on the above Findings of Fact, the Commissioner concludes the following:

1. Hazardous substances as defined in 38 M.R.S.A. Section 1362 have been handled and disposed of at the Burt Company Site.
2. Hazardous substances handled and disposed of at the Site create a danger to the public health or safety or to the environment.
3. Continued danger to the public health or safety of any person or to the environment exists as a result of the continued presence of hazardous substances in soils and/or drums at the Site and the unlimited access and proximity of the Site to residential areas of Portland.
4. The actual or threatened releases or discharges of hazardous substances in the area pose a threat or hazard to the public health, safety or welfare and to the natural environment.
5. Norman S Reef, Raymond H. Reef, John M. Kendall, Sherman B. Kendall, Arthur Girard, The Burt Company, Inc., Brothers Corporation, Inc., CHIPCO International, Inc., and R. F. Investment Trust are responsible parties as defined in 38 M.R.S.A. Section 1362.

- 6. JOM Inc. d/b/a CHIPCO International, Ltd and Atlantic Molding, Inc. are potential responsible parties as defined by 38 M.R.S.A Section 1362.
- 7. Proper removal of the hazardous substances and/or other remedial action is necessary to abate the threat, danger, or hazard to public health or safety and to the environment posed by the Site.

THEREFORE, pursuant to 38 M.R.S.A. Section 1365, the Commissioner hereby DESIGNATES the Burt Company Site in Portland, Maine an Uncontrolled Hazardous Substance Site.

ORDER, The Responsible Parties, are hereby ordered to :

Refrain from removing, or causing the removal of any item(s) from the site without the prior written approval of the Department.

Rights of Review and Appeal

Any responsible parties to whom this order is issued may apply to the Board of Environmental Protection for a hearing within 5 days of receipt of this order. The hearing shall be held within 5 days of receipt of the application. Within 7 days after the hearing, the Board shall make findings of fact and shall continue, revoke, or modify this Order.

DONE AND DATED AT AUGUSTA, MAINE THIS 12th DAY OF *April*, 1991.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Dean C. Marriot*
 Dean C. Marriott, Commissioner

DCM:dww
 BURTES4.doc



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FILE COPY

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

June 18, 1999

Roger Bondeson
City of Portland
City Hall, 389 Congress Street
Portland, Maine 04101 - 3503

RE: Burt Company Site - 1 Cambridge Street

Dear Mr. Bondeson:

As per our telephone conversation earlier, you had indicated that the City of Portland is considering using the Burt Company Site property, located at 1 Cambridge Street, for athletic fields. The Department agrees that the property would be a good location for such use, and is willing to work with the City if this path is chosen for the property.

As outlined in the BSA Report completed for the property by the Department, metals contamination in the Site soil appears to be the remaining hazardous substance issue at the property - no large source area of hazardous substance contamination was identified. The metals contamination is most likely due to dyes used in manufacturing. There are two areas with elevated levels of metals; these consist of a pool ball/ poker chip/ dye disposal area located in the southern corner of the property, and an area of surficial soil with elevated levels of lead and arsenic southwest of the operations building. The attached Brownfield Site Assessment Report provides additional description of these two areas.

Any future use of the property must be designed in a way to prevent possible contact with the contaminated soil in these two areas. This could be done by either removing the contaminated soil for off site treatment or disposal, or by installation of a cover system over the contaminated areas. If athletic fields were to be built on site, they could be constructed on top of a cover. Deed restrictions preventing excavation as well as an agreement regarding maintenance of the cover system would be necessary if this is the chosen option for addressing the concerns at the site. A similar approach was used at a junkyard that was contaminated with lead and PCBs in the City of Brewer. Tom Kurth, the Planner for Brewer, was the Departments contact with the City. He can be reached at 989-7500. The site in Brewer was somewhat different than the Burt Company site in terms of contaminants and the levels of contamination; it may be possible to achieve the objectives at Burt Company with a less substantial cover than that installed at Burt.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7655
RAY BLDG., HOSPITAL ST.

BANGOR
126 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

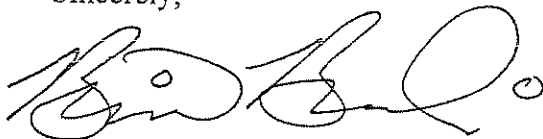
PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 764-1817

In order to design the appropriate cover system(s) for the site, or provide better cost analysis of off site disposal, additional investigative work would need to be conducted. This work would consist of collection and analysis of surficial soil samples at the operations building to determine the area of contaminated soil. Surficial soil samples of other areas of the property would also be needed to assure that no other areas of the site exceed current guidelines. Additional soil borings in the disposal area are also necessary in order to delineate the size of the waste disposal area. Unfortunately, it is impossible to develop a cost estimate for addressing the remaining contamination at the site without this additional investigative work.

I hope this letter and attached report provides some of the additional information the City needs for moving this project forward. The Department is anxious to see this property return to use; if the city wishes, we can be available to meet with the City in Portland to discuss this in greater detail. If you have any questions at all regarding this matter, please call me at 287-4858.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Beneski". The signature is fluid and cursive, with a large initial "B" and a distinct "Q" at the end.

Brian Beneski
Oil and Hazardous Materials Specialist
Division of Site Remediation

CC: Nick Hodgkins, MEDEP

Attachment



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FILE COPY

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

April 5, 2001

Patricia Meaney, Director
U.S. Environmental Protection Agency New England
Office of Site Remediation and Restoration
John F. Kennedy Federal Building
Boston, MA 02203 - 0001

Subject: State Lead Request, Burt Company Site, Portland, Maine

Dear Ms. Meaney:

The State of Maine Department of Environmental Protection (MEDEP) hereby requests that the USEPA now list the Burt Company Site, CERCLIS #985468024, as a State Lead CERCLIS Site.

The property was discovered in 1990, being listed on CERCLIS June 25, 1990. A Preliminary Assessment was conducted by the State and completed on February 6, 1991. A site Inspection conducted by Weston for the site was completed on February 23, 1993. Additionally, a Brownfield Site Assessment Report was conducted by the State and completed on February 24, 1999.

The Burt Company Site (the Site) is located on the boundary of a residential/ industrial area in the City of Portland, at 1 Cambridge Street. The site is approximately 3.1 acres in size and corresponds to the Portland Tax Assessor's Map 151-A as lot 13. The site and area surrounding it is served by municipal water and sewer. The site was the location of a billiard ball manufacturer from 1895, initially being operated by the Portland Billiard Ball Corporation. Later during its operation the company changed its name to Burt Company and added the manufacture of clay casino chips to its operation. In 1988 the company was reorganized as CHIPCO International, Inc. At this time, the company began manufacturing and printing its product offsite, and subsequently sold most of the manufacturing equipment and inventory. Since that time, the property has been vacant.

MEDEP's initial investigations into the Site began in March of 1990 after being notified by the Portland Fire Department that chemicals had been abandoned at the Site. The MEDEP subsequently sent notifications to the current property owner requesting that the property be secured and the chemicals properly disposed of. Although the site owner partially fenced the site, the owner did not indicate a willingness to properly address the

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

hazardous substances at the Site; therefore the state conducted a removal action of the abandoned chemicals and contaminated soil between 1990 and 1992. During this time, a Preliminary Assessment and a Site Inspection was conducted for USEPA. No additional investigative or remedial actions occurred at the site until 1998, at which time MEDEP conducted a Brownfield Site Assessment of the Site. The Brownfield Site Assessment concluded that two areas of the site still warrant attention. These being an area apparently used for the disposal of chips, billiard balls, and dyes located on site, and an area of elevated lead and arsenic levels (above Maine Residential Standard Guidelines) located near one of the manufacturing buildings. Also during 1998 the City of Portland conducted an asbestos abatement of the property and razed all of the buildings located on Site.

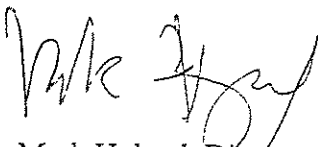
The property is currently owned by the City of Portland, having taken the property for payment of back taxes. The City has stated they are exploring the possibility of using the property for athletic fields, and would work with the MEDEP in addressing the final contamination issues as the property is developed.

Given the information presented and discussed above, MEDEP believes:

- 1) That the Site is not an appropriate candidate for NPL listing, and no further steps should be taken to list the Site on the NPL at this time;
- 2) That the current State management of this project is sufficient to ensure that public health and/or the environment are properly protected;
- 3) The Site Status on CERCLIS should indicate that the MEDEP is the lead agency at this Site.

Thank you for your consideration in this matter. If you have any questions regarding this request, please contact Brian Beneski at (207) 287 - 4858.

Sincerely,



Mark Hyland, Director
Division of Remediation
Bureau of Remediation and Waste Management

PC: Brian Beneski, MEDEP
Jean Firth, MEDEP
Matt Audet, USEPA New England

BROWNFIELDS SITE ASSESSMENT REPORT

BURT COMPANY – PORTLAND, MAINE

February 24, 1999

Prepared by:

Brian Beneski

Maine Department of Environmental Protection

Brownfield Site Assessment
Burt Company- 1 Cambridge Street, Portland Maine

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**Brownfield Site Assessment
Burt Company- 1 Cambridge Street, Portland Maine**

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1.0 INTRODUCTION

The Maine Department of Environmental Protection (MEDEP) has prepared this Brownfields Site Assessment Report (BSA) regarding the Burt Company Site in Portland, Maine for the United States Environmental Protection Agency (USEPA). The purpose of this report was to collect information concerning conditions at the Site, to assess the potential threat to human health and the environment, and to characterize the sources of contamination present at the Site.

2.0 SITE DESCRIPTION

2.1 Site Location

The Burt Company Site (the Site) is located at 1 Cambridge Street in Portland, Cumberland County, Maine at latitude 43° 41' 19" and longitude 70° 17' 20" (Figure 1). The Site is approximately 3.1 acres in size, and is listed on the Portland Tax Assessor's map 151-A, lot 13 (1).

2.2 Site Description

The site is located on the boundary of a residential/industrial area of the City of Portland (see Figure 2). The site is bordered to the northeast by residential housing, to the southeast by a warehouse, to the southwest by railroad tracks, and to the northwest by a large paved parking lot. The only vehicle access to the property is from the northeast via Cambridge Street, a residential street. A fence exists on the northwest side of the property and partially along the northeast side, and includes a gate across the access from Cambridge Street. The area surrounding the site is served by municipal water and sewer; the closest drinking water well to the site is located approximately five miles southwest of the Site in the town of Scarborough (1).

The site is covered by vegetation, mostly grass and weeds, with a few trees scattered throughout the site, particularly on the southern corner of the site. Three buildings are located on the property and were utilized by Burt Company; two buildings utilized for manufacturing, one as an office and the other as a garage (Figure 3). However, excessive vandalism and fires to these structures since the time the Site was left vacant have rendered them unusable. A small stream bisects the Site, entering from a culvert on the northeast, flowing underneath a portion of one of the manufacturing buildings, and into Milliken Brook, which flows along the southern boundary, and exits the eastern corner of the Site.

2.3 Site Activity/History

2.3.1 Manufacturing History

Available information regarding the site indicates that Portland Billiard Ball Corporation began operating at the Site in 1895 manufacturing billiard balls. Sometime after this date, the company changed its name to the Burt Company and added the manufacture of clay casino gaming chips to it's operation. The company utilized compression molding manufacturing and injection molding processes for both gaming chips and billiard balls (1).

In 1984, the Burt Company was sold to Arthur Girard who continued to operate under the Burt Company name. In 1985 The Brothers Corporation purchased the property. The Brothers Corporation continued operations under the Burt Company name until 1988 when the company was reorganized as CHIPCO International, Inc. Also in 1988, the company began using a manufacturing process utilizing offsite injection molding and printing of the product. With a shift to offsite manufacturing, most of the manufacturing equipment, inventory and materials were consequently sold to Atlantic Molding, Inc. (1).

In May of 1988, R.F. Investment Trust purchased the site, and subsequently leased the property in 1989 to Bekor Industries, Inc., an asbestos abatement firm. In October of 1989 the first of numerous fires damaged several of the buildings on site. After this fire Bekor Industries vacated the Site; the property has been idle ever since (1).

2.3.2 Regulatory History

In March of 1990 the Portland Fire Department, while responding to a fire reportedly set by vandals, observed and reported to the MEDEP various chemicals and powders were unsecured and were released into the environment. The MEDEP subsequently sent notifications to the current property owner which requested that the property be secured and the hazardous substances be stabilized and properly disposed of. Although Mr. Reef partially fenced the property, he did not indicate a willingness to properly address the hazardous substances at the site (1).

In May of 1990, the MEDEP contracted with LRS Environ-Services, Inc. to secure and stage the hazardous wastes at the Site. LRS performed the site work from May 23, 1990 to June 7, 1990, stockpiling approximately 45 cubic yards of contaminated soil and 180 overpacked drums of waste material. The wastes were temporarily staged on site until MEDEP could make final disposal arrangements. In December 1990, MEDEP completed a Preliminary Assessment report of the Site; this report recommended that a Screening Site Inspection be performed at the Site. In April of 1991, the MEDEP formally designated the Site as an Uncontrolled Hazardous Substance Site (1).

Brownfield Site Assessment Report
Burt Company Site - 1 Cambridge Street, Portland Maine

In November of 1991, the Portland Water District obtained samples from Milliken brook in an attempt to locate a source of elevated cadmium levels at the Portland Wastewater Treatment Plant. Only low levels of cadmium were detected, and the district concluded that the Site was not the source of the cadmium at the treatment plant (1).

Additional work was conducted by LRS in April of 1991 to: inventory the drummed waste staged on site; collect samples for disposal considerations; and pack the material in a more secure manner. In May of 1992 LRS utilized the following contractors for disposal of the material on Site: Michigan Disposal, Inc. for the disposal of stockpiled soil and overpacked wastes; Jet-Line Services, Inc. for the disposal of 3,500 gallons of No. 2 and No. 6 heating fuel; General Chemical, Inc for the disposal of various flammable oil and water mixtures; and Frontier Chemical Waste Process, Inc. for the disposal of alkaline and ethyl alcohol waste solutions (1).

In November of 1992, Roy F. Weston, Inc. (RFW), completed a Final Site Inspection Report on the Site for the USEPA. Fieldwork conducted for this report included the collection and analysis of soil samples at the Site. Although the report itself made no conclusions, USEPA recommended additional work under CERCLA, using the results of the soil sampling as the basis of their conclusion (2).

Since the final removal of the stockpiled material in the May of 1992 and the field work for the RFW report in April of 1992, no additional investigative or remedial work has been conducted at the Site, with the exception of the field work conducted in June of 1998 for this report.

As of November of 1998, the City of Portland has begun abatement work of the asbestos in the buildings on site. The City anticipates demolishing the buildings on site in the later part of 1998 (3).

2.4 Potential Sources of Contamination

The raw materials formerly used on-site by the Portland Billiard Corporation, Burt Company, and Brothers Corporation include many hazardous and nonhazardous substances as defined under Title 40, part 261 of the code of Federal Regulations. Pigments and filler materials containing lead, antimony, cobalt, zinc, nickel, chromium, cadmium, and barium compounds were commonly used in past manufacturing operations at the site. Other materials possibly used onsite include TEK-SOL, a solvent composed mainly of aromatic hydrocarbons (1).

No information is available about waste disposal practices during manufacturing at the Site. Therefore, MEDEP conducted the fieldwork using field conditions such as "staining" and "filled areas" as possible source areas.

Current conditions at the site indicate that two areas may have been utilized for waste disposal from the manufacturing process. These areas are on the eastern portion of the Site and are separated from each other by the stream bisecting the site. Both of these

areas exhibit the characteristics of being "filled". It is also possible that waste material may have also been discharged into the stream as it runs underneath the main manufacturing facility. The possibility also exists that waste has been haphazardly discharged around the back areas of the manufacturing buildings.

3.0 SOURCE ASSESSMENT

3.1 Previous Sampling

Sampling was first conducted at the Site by MEDEP in March of 1990. Sample of spilled bags of lead monosilicate and dye were collected and analyzed for total metals and EP TOX metals. To determine the impact of the spilled material, representatives from MEDEP returned to the Site in May of 1990 to collect samples from soil in front of and underneath the floorboards in the garage for volatile organic compounds (VOCs) and EPTOX metals. After conducting a soil removal in this area, MEDEP returned in September 1990 to collect post excavation samples after a soil removal in this same area. From the post excavation results it appears that the removal action was successful (1).

RFW conducted a sampling event for a USEPA contracted Site Investigation in June 1990. This sampling event concentrated on surficial soil (six samples) and sediment samples (six samples) of the unnamed stream and Milliken Brook (Figure 3). A summary of the compounds detected during the RFW sampling can be found on Table 1 along with the MEDEP "Remedial Action Guideline for contaminated soil (RAG)" residential level for that respective compound. Compounds listed on Table 1 are those that were detected at levels three times greater than reference concentration (i.e., background samples, sample detection limit, or sample quantitation limit).

Arsenic and Lead were the only compounds detected at levels above the MEDEP's Remedial Action Guidelines for Contaminated Soil. Arsenic exceeded the 10 mg/kg residential standard at locations SS-03 (31.8 mg/kg), SS-04 (33.6 mg/kg), and SD-11 (10.8 mg/kg). Lead exceeded the 375 mg/kg residential guideline at locations SS-03 (2,230 mg/kg), and SS-04 (1,600 mg/kg). SS-04 was a duplicate sample taken of SS-03 for quality control purposes.

Since previous sampling on surficial soil and sediment had been done, sampling for the BSA concentrated on groundwater and subsurface soil in an effort to determine if any "source areas" of hazardous substances exist.

3.2 BSA Assessment Methodology/Field Schedule

On July 1 and July 2, 1998 representatives of the MEDEP visited the Site for the purpose of conducting the fieldwork for this BSA. A Concord Environmental "Little White Wagon" hydraulic direct push hammer was utilized in conjunction with a Geoprobe® soil boring system. A 1 inch outside diameter PVC microwell was installed in each soil boring to allow collection of overburden groundwater. Groundwater samples were also obtained using Geoprobe®'s mill slotted well point system.

Table 1
Summary of compounds Detected during RFW Sampling

Compound	Sample locations detected	Highest Level	RAG
Arsenic	SS-03; SS-04; SD-07,SD-11	33.6 mg/kg	10 mg/kg
Aluminum	SD-11	30,800 mg/kg	-
Barium	SS-03; SS-04	6,900 mg/kg	10,000 mg/kg
Copper	SS-03; SS-04	539 mg/kg	650 mg/kg
Cobalt	SD-11	20.5 mg/kg	-
Chromium	SD-11	64.4 mg/kg	960 mg/kg
Iron	SD-11	43,900 mg/kg	-
Lead	SS-03; SS-04	2,230 mg/kg	375 mg/kg
Mercury	SS-01; SS-03; SS-04	1.4 mg/kg	60 mg/kg
Sodium	SS-03; SS-04	441 mg/kg	-
Magnesium	SD-11	11,300 mg/kg	-
Manganese	SD-11	608 mg/kg	-
Potassium	SD-11	9,910 mg/kg	-
Thallium	SD-11	0.42 mg/kg	-
Vanadium	SS-03; SS-04; SD-11	442 mg/kg	-
Zinc	SS-03; SS-04;	680 mg/kg	1,500 mg/kg
Fluoranthene	SS-02; SS-03; SS-04;	0.390 mg/kg	-
Pyrene	SS-02; SS-03; SS-04	0.200 mg/kg	-
Aroclor 1260	SD-07	0.350 mg/kg	2.2 mg/kg

RAG – Remedial action guideline
 - no RAG available

3.2.1 Soil Boring Methodology

Locations of the soil borings can be seen in Figure 4. Please refer to Appendix A for soil boring logs. The Large Bore Sampling probe was utilized at four locations (GP – 1 through GP - 4). At two other locations, a Geoprobe® Systems Mill – Slotted Well Point with a Geoprobe® Systems manual hammer was utilized to create the borehole for microwell installation. Soil samples from the Borings were field screened with a photo ionization detector (PID) following the standard MEDEP protocol as outlined in the “Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Groundwater in Maine”.

3.2.2 Microwell Installation/Sampling Methodology

After reaching the end point of the boring, a 1 inch PVC well with a 10 slot screen was then inserted into the soil boring hole immediately after the withdrawal of the

Geoprobe® unit. Filter sand was then placed around the PVC well to fill the annulus around the screen. A bentonite seal was placed at the top of the annulus to prevent direct surface water infiltration.

After installation of the microwell, ¼ inch polyethylene tubing was inserted into each well, and a peristaltic pump was then used to draw a sample of the groundwater from the well. Since the overburden of the Site consisted of a relatively tight formation, the initial purge rates were set at the lowest possible flow, and the appropriate sample containers were filled after one tubing volume was purged to assure the collection of the groundwater samples from the well. Field personnel then attempted to develop the microwell at a constant flow rate while maintaining a constant water level. If further development was possible, additional samples were collected. If a second sample with lower silt content was collected, the initial samples were discarded. If the well did not recharge adequately to allow further development, field personnel allowed the well to recharge for several hours before attempting to collect additional samples.

3.3 Sampling Locations

Samples were collected from six locations on site. The sampling locations can be seen of Figure 3, the rationale for the locations are described below.

GP-1: An area of the site with the appearance of being a fill/waste disposal area.

GP-2: An area of the site with the appearance of being a fill/waste disposal area.

GP-3: An area of stained soil. Located "behind" back maintenance building, a likely area for "lazy employee waste disposal".

GP-4: Located downgradient of the main manufacturing facility, in area most likely to be impacted if material was discharged in the stream as it flows under the main building.

SS-1: Located in the stained soil area downgradient of the back manufacturing building.

SS-2: Located between manufacturing buildings in an area with nearby fuel oil tanks.

3.4 Analytical Parameters

Table 2 presents the media and sample analysis for each location. An attempt was made at each location to obtain groundwater samples for the following parameters: volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and the following metals: lead; antimony; cobalt; zinc; nickel; chromium; cadmium; barium, copper, mercury; arsenic; selenium; and silver. At locations where groundwater recharge did not allow collection of the full parameter list, a decision was made using field conditions for that specific location for the priority of analysis. At some locations where groundwater was unavailable for sampling, soil samples were analyzed instead.

TABLE 2
Sample Parameter/Media for Brownfield Site Inspection

Sample location	Media	analytical parameters
GP-1	groundwater	volatile organic compounds
	soil (6' - 8')	metals
GP-2	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
	soil (2' - 4')	volatile organic compounds
	soil (4' - 6')	semivolatile organic compounds
GP-3	soil (4' - 6')	metals
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
GP-4	soil (2' - 4')	metals
	soil (6' - 8')	semivolatile organic compounds
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds
	groundwater	metals
SS-1	soil	semivolatile organic compounds
	soil	metals
	groundwater	volatile organic compounds
SS-2	groundwater	semivolatile organic compounds
	groundwater	metals
	groundwater	volatile organic compounds
	groundwater	semivolatile organic compounds

4.0 ANALYTICAL RESULTS

A summary of the analytical results can be seen on Table 3 & 4, laboratory data sheets in Appendix B. In the text of this report, the number in parentheses is either the maximum exposure guidelines for that compound (for a water sample) or RAGs (for a soil sample).

4.1 GP-1

GP-1 is located in the northeast fill area. Field PID readings for all borings were less than 10 ppm. Methyl t-butyl ether (MTBE) was detected in the VOC analysis at 1.12 µg/L (36 µg/L). The following metals were detected: Lead at 47 mg/kg (375 mg/kg), cobalt at 14 mg/kg, zinc at 180 mg/kg (1,500 mg/kg), nickel at 57 mg/kg (3,800 mg/kg), chromium at 68 mg/kg (950 mg/kg), barium at 210 mg/kg, copper at 36 mg/kg (650 mg/kg), arsenic at 26 mg/kg (10 mg/kg), and mercury at 0.16 mg/kg (60 mg/kg).

Brownfield Site Assessment Report
 Burt Company Site – 1 Cambridge Street, Portland Maine

TABLE 3
 Summary of Analysis - Soil

Compound	GP-1	GP-2	GP-3	GP-4	RAG
Lead	47	830	4.2	7.0	375
Zinc	180	3,600	25	21	1,500
Copper	36	73	8	6.2	650
Arsenic	26	220	ND	4	10
Cadmium	ND	47	ND	ND	27
Barium	210	230	33	12	10,000
Cobalt	ND	4.3	ND	ND	-
Nickel	57	17	9.4	5.0	3,800
Chromium	68	170	17	9.4	950
Selenium	ND	13	ND	ND	950
Dichloromethane	NS	0.810	ND	ND	-
Diethyl phthalate	NS	10	ND	ND	-
Dibutyl phthalate	NS	120	ND	ND	-
Di phthalate	NS	14	ND	ND	-
Di n octyl phthlate	NS	2.6	ND	0.26	-
Phenol	NS	ND	ND	0.1	-
2-methol phenol	NS	ND	ND	0.19	-

Concentrations in milligrams per kilogram

RAG – MEDEP Remedial action Guidelines; - no RAG for compound

NS – compound not sampled for at that location

ND – compound not detected at that location

Table 4
 Summary of Analysis – Groundwater

METAL	GP-2	GP-3	GP-4	SS-1	MEG
Lead	0.057	ND	ND	0.004	0.05
Cobalt	0.015	ND	ND	0.004	-
Zinc	3.3	0.045	0.06	0.39	-
Nickel	0.020	0.045	ND	0.006	0.15
Chromium	0.004	ND	ND	ND	0.10
Barium	0.70	0.065	0.051	0.22	1.0
Copper	0.011	0.007	ND	0.022	-
Arsenic	0.91	0.006	0.005	0.047	0.050
Selenium	0.006	ND	ND	ND	0.010
MTBE	1.12	ND	5.28	3.77	35
DI Phthalate	1.5	ND	2.1	ND	25

Concentrations in milligrams per liter for metals, micrograms per liter for organic vompounds

ND – Compound not detected at that location

MEG – State of Maine maximum exposure guidelines for drinking water

- no MEG for that compound

4.2 GP-2

GP-2 is located in the southeast fill area. The highest PID reading was recorded for the boring at 4' - 6', which had a reading of 11.2 ppm. All other intervals had readings less than 10 ppm. Different colors were observed in the soil of borings 2' - 4' (red), and 4' - 6' (purple, red, and orange), indicating that this area may have been used for the disposal of dye or off spec billiard balls and/or gaming chips.

No volatile organic compounds were detected in the groundwater. Dichloromethane was detected at 0.810 mg/kg and MTBE at <0.005 mg/kg in the soil sample submitted for VOC analysis.

Diethyl phthalate was detected in the groundwater sample submitted for SVOC analysis at 1.5 µg/L. The following compounds were detected in the soil sample submitted for SVOC analysis: Diethyl phthalate at 10 mg/kg; dibutyl phthalate at 120 mg/kg; di (2 ethylhexyl) phthalate at 14 mg/kg; and di n octyl phthalate at 2.6 mg/kg.

Levels of Lead and arsenic in the groundwater from GP-2 exceeded their respective MEGs. Levels of Lead, zinc, and cadmium in the soil borings exceeded its respective RAGs.

4.3 GP-3

GP-3 was located in an area of surface staining behind the back maintenance building. Field PID readings were 10.6 ppm for boring interval 2' - 4', and 14.7 ppm for boring interval 4' - 6'.

No compounds were detected in the groundwater sample submitted for VOC analysis. No soil samples were submitted for VOC analysis.

No compounds were detected in the soil sample or groundwater sample submitted for SVOC analysis.

No MEGs or RAGs were exceeded for any of the compounds that were detected.

4.4 GP-4

GP-4 was located northerly adjacent to the stream that flows beneath the main manufacturing building. The purpose of this sampling location was to determine if waste material was discharged into the stream as it flows beneath the building. The highest field headspace reading at this location was 16.3 ppm in the 4' - 6' boring; all others were below 10 ppm.

MTBE was the only VOC detected in the groundwater sample from this location. The only compound detected in the SVOC groundwater analysis was di (2ethylhexyl)

Brownfield Site Assessment Report
Burt Company Site – 1 Cambridge Street, Portland Maine

phthalate at 2.1 µg/L. Di (2ethylhexyl) phthalate was also detected in the soil SVOC sample at 0.26 mg/kg. Additionally, phenol and 2-methol phenol were detected in the soil sample of the SVOC analysis at 0.1 mg/kg and 0.19 mg/kg, respectively.

No MEGs or RAGs were exceeded for any of the compounds detected.

4.5 SS-1

Since SS-1 was a driven point only for the collection of groundwater, no soil samples from this location were obtained. MTBE was the only compound detected in the VOC analysis at 3.77 µg/L. No compounds were detected in the sample submitted for SVOC analysis. The following metals were detected: lead – 0.004 mg/l (0.05 mg/l); cobalt – 0.004mg/l; zinc – 0.39 mg/l; nickel – 0.006 mg/l (0.15 mg/l), barium – 0.22 mg/l (1.0 mg/l), copper – 0.022 mg/l; arsenic – 0.047 mg/l (0.050 mg/l). As can be seen, no concentrations exceeded the MEGs for its respective compound.

4.6 SS-2

Since SS-2 was a driven point only for the collection of groundwater, no soil samples were obtained. No compounds were detected in either the VOC or SVOC sample analysis.

5.0 DISCUSSION

From the visual observations and analytical results, it appears that the only area of the Site was used for waste disposal is in the vicinity of GP-2. Metals appear to be the only contaminants found in any elevated level, most likely from the dyes used in coloring the billiard balls and gaming chips. In addition to colors being observed in the soil samples, the highest soil levels for lead, zinc, chromium, arsenic, and barium were detected in samples from GP-2. However, only lead and arsenic exceed the MEGs in the groundwater sample obtained from the microwell installed in this area.

GP-1 had elevated levels of metals as well, however none of the levels in the soil sample for GP-1 exceeded the RAGs, with the exception of arsenic.

The compounds detected in elevated levels in GP-2 were not detected above reference concentrations in the sediment samples collected downstream from this area (SD-07 and SD-11), indicating that this source area does not appear to be impacting Milliken Brook.

Additionally, sampling conducted by RFW in 1992 indicated the presence of lead and arsenic above Maine's RAGs in the area of sample SS-03 and SS-04.

6.0 CONCLUSIONS

There appears to be two areas of the site impacted above current health guidelines. These two areas consist of the waste disposed of in the area of GP-2, and the area of RFW sample location SS-03 and SS-04.

Since the surrounding area is served by municipal water, the levels of metals in the soil at GP-2 would not warrant removal unless this area was excavated; in that instance the material excavated would have to be characterized and disposed of appropriately. Additionally, some type of cap or cover system should be installed over this area to assure that the contamination is not available to those accessing the site, as well as notification placed on the deed to assure future users of the site to be aware of this particular area. The need for deed restrictions would be unnecessary if a removal of this waste material was conducted.

Additional investigative work should be done in the area of RFW sample location SS-03 and SS-04 to determine the size of the area with lead and arsenic concentrations above the RAGs. Excavation for offsite treatment and disposal or installation of a cap or cover system or cap may be prudent remedial techniques for addressing this area. As with the case with the source area near GP-2, deed restrictions would be required if capping or cover system was chosen as the remedial option; deed restrictions would be unnecessary if the contamination was excavated and disposed of or treated properly off site.

References

1. Roy F. Weston. Final Site Inspection Report -- Burt Company, Portland Maine. November 20, 1992.
2. Smith, Nancy. USEPA Region 1. EPA Form #100-3, Remedial Site Assessment Decision for Burt Company, Portland Maine. February 23, 1993.
3. Beneski, Brian. Maine DEP. Telephone Conversation log for Burt Company, Portland Maine. October 30, 1998.



© 1993 DeLorme Mapping

LEGEND

- | | |
|----------------------|--------------------|
| Population Center | Street, Road |
| State Route | Major Street/Road |
| Geo Feature | State Route |
| Town, Small City | Interstate Highway |
| Hill | US Highway |
| Park | Railroad |
| Interstate, Turnpike | River |
| US Highway | Open Water |

Scale 1:31,250 (at center)

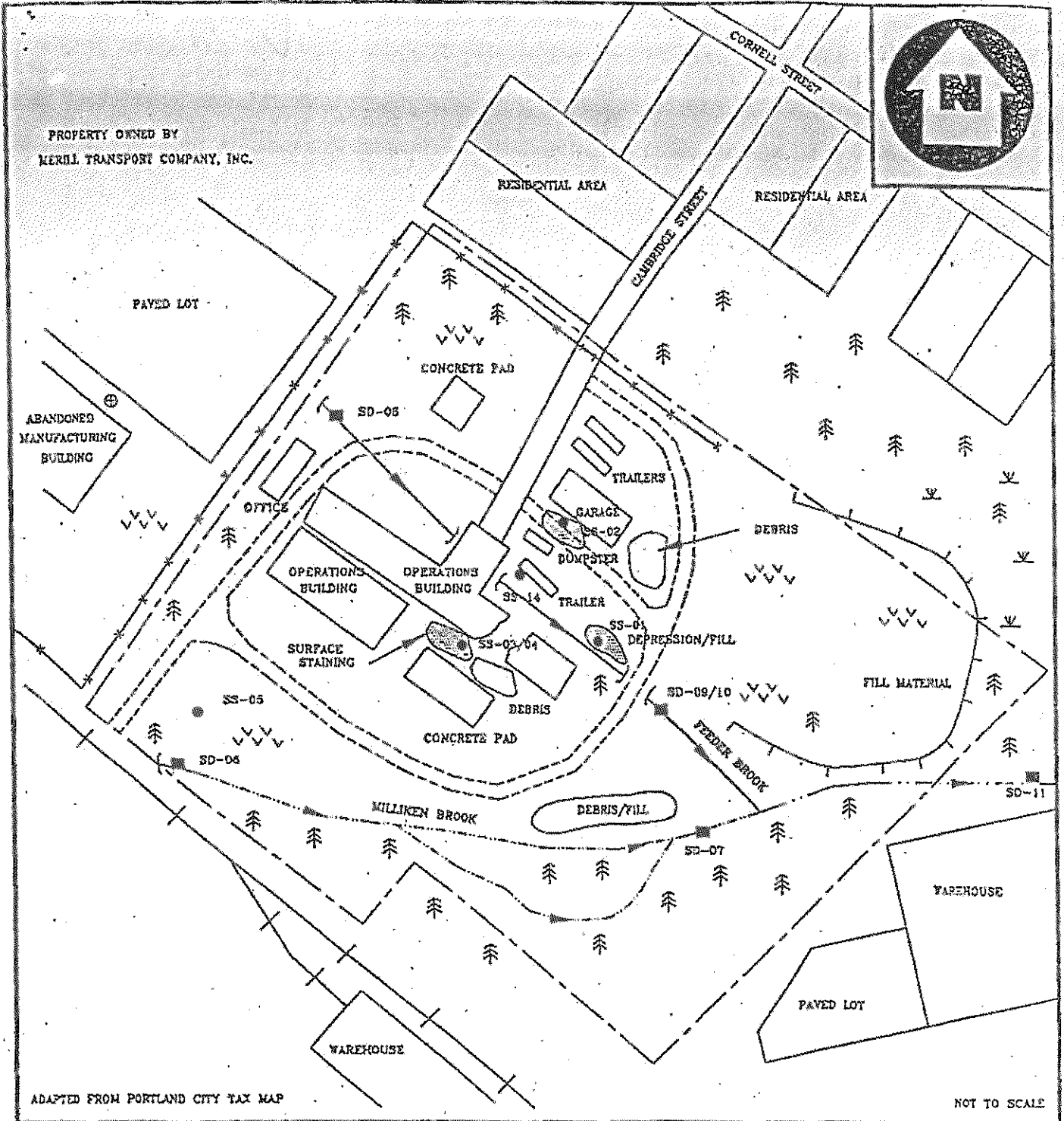
2000 Feet

1000 Meters

Mag 14.00

Wed Nov 04 15:31:15 1998

Figure 1
Site Location
 Brownfield Site Assessment Report
 Burt Company - 1 Cambridge Street
 Portland, Maine



LEGEND

	FENCE WITH GATE		GRASSY AREA		SEDIMENT SAMPLE LOCATION
	SOIL SAMPLE LOCATION		DIRT ROAD		MONITORING WELL
	PROPERTY BOUNDARY		WOODED AREA		WETLAND AREA
	RAILROAD TRACKS		INTERMITTENT BROOK		CULVERT

SITE SKETCH
BURT COMPANY
PORTLAND, MAINE

Figure 3
Sampling by RFW
Brownfield Site Assessment Report
Burt Company - 1 Cambridge Street
Portland, Maine

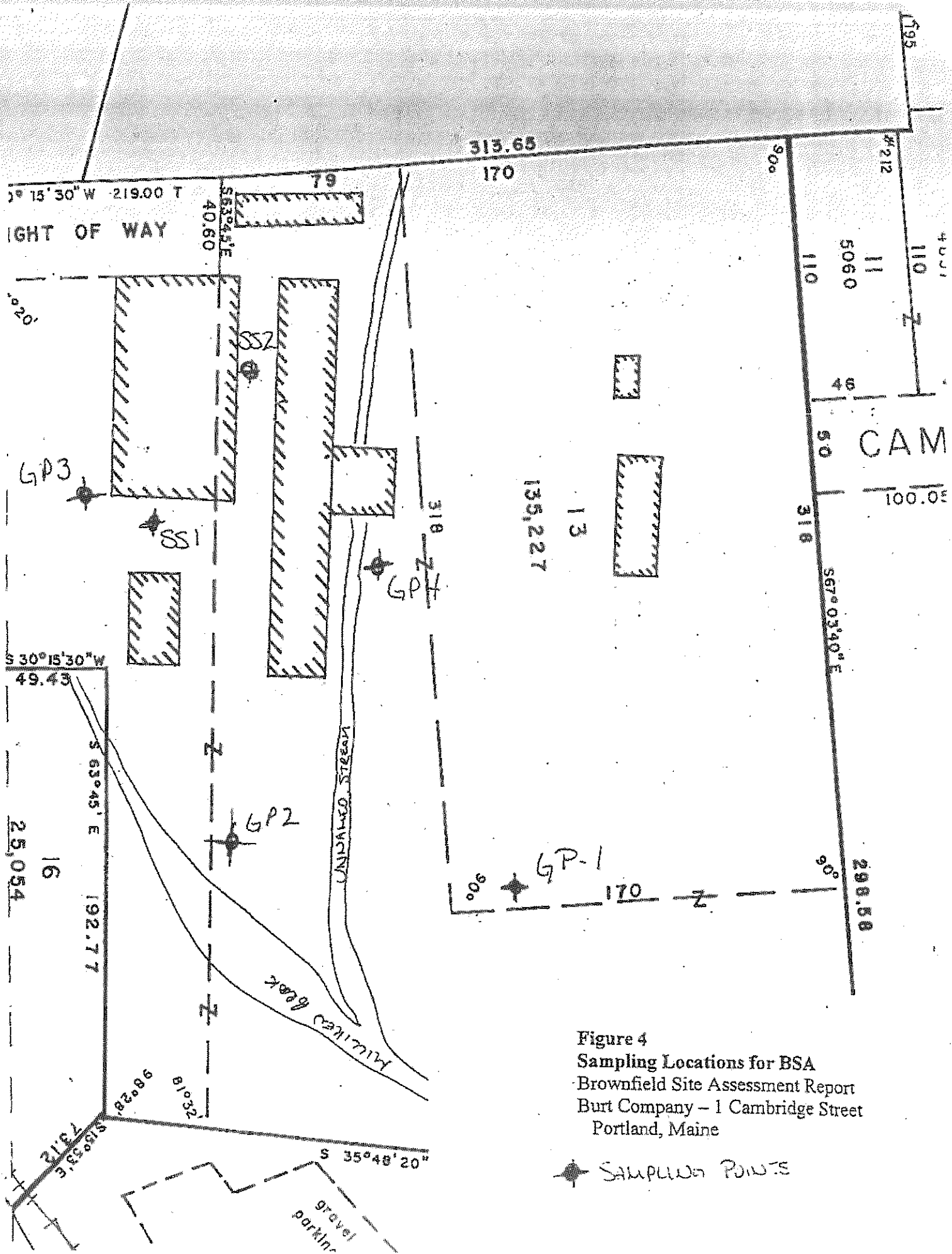


Figure 4
 Sampling Locations for BSA
 Brownfield Site Assessment Report
 Burt Company - 1 Cambridge Street
 Portland, Maine

★ SAMPLING POINTS

FILE



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 4, 2008

MC Portland, LLC
Mr. Paul Cincotta, Vice President
c/o Packard Development
One Wells Avenue
Newton, MA 02459

RE: Parcel CP, Morrills Crossing, Cornell Street, Portland Maine
Voluntary Response Action Program No Action Assurance Letter

Dear Mr. Cincotta:

The Maine Department of Environmental Protection's ("Department's") Voluntary Response Action Program ("VRAP") has received MC Portland, LLC ("MC Portland") application for Parcel CP Morrills Crossing, located on Allen Avenue in Portland, Maine ("Parcel CP"). The application was submitted with the request that the Site participate in the VRAP, and that MC Portland LLC, as an applicant to the VRAP, receive the protections provided by the VRAP law. Submitted to the Department as part of the VRAP application was a Site Investigation Report, prepared by St. Germain & Associates, Inc. ("St. Germain"). This report outlines the history of the Site and environmental conditions of Parcel CP. Also included in the VRAP submittal was a cover letter which outlined proposed remedial actions for the property that are to occur prior to and during the redevelopment of Parcel CP.

Based on the information presented in the Report, the Department concurs with the proposed remedial actions and procedures as outlined in the cover letter to the VRAP Application. As stated in the Site Investigation Report, the Site's previous use consisted of a billiard ball and poker chip manufacturer. Historic environmental site assessments have identified lead and arsenic impacts in soil. To further assess the actual impact of historic land use to Parcel CP, several phases of test borings have been conducted by St. Germain. Areas of the eastern portion of Parcel CP were identified with lead and arsenic levels in soil exceeding Department Remedial Action Guidelines ("RAGs") for residential or adult worker standards were identified. No petroleum impacted soil above the appropriate remedial standard was identified.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

Parcel CP exhibits characteristics which would qualify it as a "Baseline-2" level petroleum remediation, as enumerated in the Department's "Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Ground Water in Maine". A Baseline-2 remediation requires the removal of free-product petroleum in groundwater and the removal/remediation of petroleum saturated soils, as well as the removal/remediation of petroleum contaminated soils with greater than 500-1000 parts per million ("ppm") of gasoline range organics ("GRO") and/or greater than 200-400 ppm of diesel range organics ("DRO"), as measured using the Department's field headspace method. A target clean up goal of 400 ppm is appropriate for any encountered petroleum impacted soils. If contamination extends below the groundwater table, the VRAP staff will be contacted to determine the need to remove contaminated soil below the groundwater table.

The Cover Letter with the VRAP application outlines the conceptual plan for addressing environmental contamination at Parcel CP. A more complete remediation plan will be submitted to VRAP for approval at least two weeks prior to initiation of redevelopment activities. As outlined in the cover letter, soil impacted with elevated lead and arsenic will remain on-Site but will be isolated using engineering and institutional controls. Parcel CP has two distinct redevelopment plans: the eastern portion of the Site will be used for stormwater detention ponds, the western portion will be occupied by a recreation field and associated parking. For the detention pond areas, post - redevelopment surfaces with lead and/or arsenic concentrations above the Adult Worker/Trespasser RAG will be buried under 12 inches of vegetated fill or covered with rip rap. Soil with arsenic and lead concentrations below the Adult Worker/Trespasser RAGs will be used for construction of the ponds without restriction but covered with rip rap or vegetated. The Ponds will then be fenced. Soil at the proposed recreation field with lead or arsenic concentrations above the Residential RAG, as well as excess lead/arsenic impacted soil generated from the detention pond construction, will be buried beneath the field under 12 inches of vegetated fill, building foundations, or asphalt pavement upon completion of redevelopment. Soil requiring isolation may be temporarily stockpiled on the Property before being replaced. Upon completion and approval of site redevelopment activities, an Environmental Covenant with appropriate activity and use limitations will be recorded. It is possible that contaminated soil or other waste material may be encountered that is not currently known about. If such material is encountered, VRAP will be notified as outlined in the cover letter.

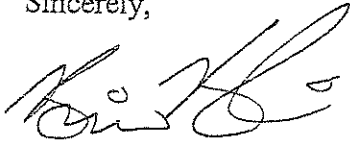
Provided that the remedial actions are completed to the satisfaction of the Department, MC Portland LLC, and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at Cornell Street, identified as Lot 13, Block A, on Portland Tax Map 151A, as listed in Book 8279 on Page 185 of the Cumberland County Registry of Deeds. The Department will take no action against MC Portland LLC and those persons identified in 38 M.R.S.A. §343-E(6).

All remedial measures completed at Parcel CP will be documented in a Site Remediation Report and forwarded to the VRAP, as described in the Cover Letter. Upon determining

successful conclusion of the remedial tasks, the Department will issue to MC Portland LLC a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please call me at 207-287-4858.

Sincerely,



Brian Beneski, VRAP Project Manager
Division of Remediation
Bureau of Remediation and Waste Management

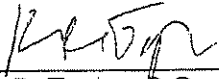
CC: Keith Taylor, St. Germain & Associates Inc.
Natalie L. Burns, ESQ, Jensen Baird Gardner & Henry
Nick Hodgkins, MEDEP
Bill Bullard, MEDEP

SITE INVESTIGATION REPORT
PARCEL CP
MORRILL'S CROSSING PROJECT
ALLEN AVENUE
PORTLAND, MAINE

Prepared For:

MC Portland, LLC
c/o Packard Development
One Wells Avenue
Newton, Massachusetts 02459

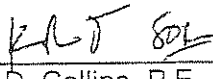
January 25, 2008
St.Germain File No.: 2594.5



Keith R. Taylor, C.G.
Senior Hydrogeologist

1/25/08

Date



Scott D. Collins, P.E.
Vice President

1/25/08

Date

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APPENDICES

Appendix A:	Historical Records
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Appendix D:	FirstSearch™ Report
Appendix E:	Portland Water District Mains
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1.0 EXECUTIVE SUMMARY

This report documents environmental site assessments conducted on Parcel CP for the proposed Morrill's Crossing project in Portland, Maine. These assessments were completed in anticipation of the redevelopment of the land into stormwater detention ponds and a recreation field with associated parking. The purpose of the assessments was to identify environmental impacts that could affect the redevelopment plans. The assessment process began with a 2005 review of available government, historical, and environmental records and site reconnaissance to identify conditions that would require site-specific sampling (Phase I Environmental Site Assessment). Soil borings and laboratory testing was subsequently completed in 2005, 2006, and 2007 (Phase II Environmental Assessments).

Conditions initially identified on this parcel that warranted further assessment consisted of former, high-risk land use (e.g., billiard ball and poker chip manufacturer) and documented lead and arsenic impacts in soil. Several phases of test borings identified areas of elevated lead and arsenic in soil on the eastern half of the lot. Depending on the future land use and post-development grades, impacted soil may need to be removed or buried on-site to meet MEDEP RAGs for Residential or Adult Worker standards.

2.0 INTRODUCTION

2.1 Purpose

St.Germain & Associates, Inc. (St.Germain) has prepared this report to document the results of Phase I and II Environmental Site Assessment (ESA) investigations conducted on the CP Parcel (Site) between 2005 and 2007 for the proposed Morrill's Crossing project in Portland, Maine. These investigations were completed in anticipation of the redevelopment of the abandoned industrial land into stormwater detention ponds, a recreation field, and associated parking. The assessments focused on the identification of environmental impacts that could affect the redevelopment plans, and if present, to provide data to develop remedial action plans to address these impacts.

2.2 Site Description and History

The overall redevelopment property is located on Allen Avenue in Portland, Maine, just east of the intersection with Forest Avenue (**Figure 1, Site Location Map**). The Site is one of five parcels that are part of an approximately 20-acre property targeted for redevelopment. The Site is located on the far eastern end of the redevelopment property and is bounded on the west by the A2-BF and A2-RU subparcels. City of Portland Tax Map lot number, owner, and parcel area are summarized below.

Development Parcel and Portland Tax Map Designations

Parcel Designation	Tax Map	Tax Block	Lot Number	Owner	Area (acres)
CP (aka City Lot)	151A	A	13 (full)	City of Portland	3.1

Figure 2, Site Aerial Photograph, shows the overall redevelopment property with the parcel designations and existing conditions as of 2001. On a regional scale, the redevelopment property is located in a mixed residential and commercial portion of Portland with mostly residences to the north and east and commercial buildings to the west and south. A series of active railroad tracks define the southwestern side of the property. The Site itself is currently unoccupied and is characterized by a mix of open fields and woods. The Portland Water District provides drinking water and public sewer service to the surrounding area.

According to Sanborn Fire Insurance Maps (see **Appendix A, Historical Records**), the Site has been used from the 1800s to the 1980s as a billiard ball and poker chip manufacturer (the Burt Company). The buildings associated with this business have been removed. **Figure 3, Historical Land Use and RECs**, depicts current and historical structures and their uses for the Site and adjacent development area.

2.3 Topographic and Geologic Setting

The Site is relatively flat topographically with a gentle slope to the southeast except along the far eastern edge, which drops abruptly down to Milliken Brook. The Site is bisected by a drainage ditch that runs from west to east and discharges into Milliken Brook. Milliken Brook flows into Fall Brook which in turn discharges into Back Bay, a tidal inlet about 1 mile southeast of the Site.

According to the Maine Geological Survey (MGS) Surficial Geology Map of the Portland West Quadrangle (Open File 97-51), the Site is underlain by the Presumpscot Formation, consisting of clay, silt, and minor sand. The MGS Bedrock Geology of the Portland 1:100,000 Quadrangle Map (Open File 98-1) shows the Hutchins Corner Formation, a biotite and calc-silicate gneiss with migmatite bands and a northeast regional fabric, beneath the Site. This rock type is consistent with bedrock exposures observed in the west part of the Site.

Soil borings advanced on the overall development property and described in Sections, 4.0, 5.0, 6.0, and 7.0 encountered clay, silt, and sand deposits consistent with the Presumpscot Formation, as well as organic swamp deposits and a basal layer of glacial till. A variety of fill materials consisting mostly of silt, sand, and gravel was also present. Borings advanced on the Site encountered up to eight feet of fill overlying marine clay. Overburden thicknesses ranged from zero where bedrock is exposed on the west side of the Site to over 14 feet to the east, where bedrock was not encountered.

A ground water contour map prepared in 1986 (See Section 2.4 for details) showed ground water across the overall development property flowing to the southeast with water table depths ranging from about 3 to 4 feet. Ground water was encountered in a monitoring well installed in 2006 by others on the Site at 6 feet below grade (see Section 5.0 for details). These depths and flow direction are consistent with Site topography and geology.

2.4 Environmental Assessment History

Several environmental assessments were conducted on the Site between 1990 and 1999 and are summarized below (see **Appendix B, Historical Environmental Records**). This information was collected as part of the Phase I ESA described in Section 3.0.

In 1990, the MEDEP investigated the abandoned Burt Company facility in response to public complaints of vandalism, fires, and chemical spills. The MEDEP confirmed the presence of unsecured buildings, chemicals dispersed by vandals, and waste piles. The MEDEP secured the buildings and later removed some of the chemicals and waste but recommended a more extensive assessment. The MEDEP formally designated the Burt Company site as an Uncontrolled Hazardous Substance Site in 1991.

In 1992, Roy F. Weston, a contractor for the US Environmental Protection Agency (USEPA), conducted a Final Site Inspection of the Burt Company site under CERCLA. Their report documents the site history and conditions in detail, and includes the results of limited soil sampling, which showed elevated concentrations of several heavy metals including lead and arsenic.

In 1999, the MEDEP completed a Brownfields Site Assessment of the Burt Company site. MEDEP collected soil and ground water samples from four locations for analysis of VOCs, semi volatile organic compounds (SVOCs), and heavy metals. Concentrations of lead, arsenic, zinc, and cadmium from one soil sample (GP-2) were above the MEDEP Residential Remedial Action Guidelines (RAGs). This sample location corresponded with the presence of colored dyes and plastic debris in the soil. The ground water samples did not show significant impacts with respect to metals except for elevated arsenic and lead at GP-2. Low levels (less than 6 parts per billion (ppb)) of the VOC methyl tertiary butyl ether (MTBE) were detected in three of the

ground water samples. The MEDEP recommended additional characterization to determine the full extent of metal impacts and whether capping or removal would be appropriate. The MEDEP subsequently provided the City of Portland with a letter describing conceptual remedial options.

To the best of our knowledge, no other environmental testing or investigations related to petroleum products or hazardous substances were conducted on the Site prior to 2005.

2.5 Remediation Standards

In 2005 and 2007, St.Germain discussed potential remediation requirements with Mr. Brian Beneski of the MEDEP based on data available at those times. Because of the lack of private water supply wells in the area and only limited evidence for ground water impacts on the Site, the MEDEP stated that only impacted soil would need to be considered for remediation.

For metal impacts, the MEDEP concluded that the cleanup standard will depend on the future use of the property but would follow the MEDEP Remedial Action Guidelines (RAGs). The RAGs assign concentration thresholds for metals based on the land use (Residential, Adult Worker, and Trespasser). For lead and arsenic, the RAGs for Adult Worker and Trespasser are the same. According to the MEDEP, the planned use of the eastern part of the CP parcel for stormwater detention ponds would allow a MEDEP RAG Trespasser guideline to be applied since this area will be fenced and not accessible by the public. In contrast, areas expected to be frequented by the public without pavement or buildings covering the soil (i.e., the recreational field) would need to meet the Residential RAGs. Other strategies may also be considered such as placing a buffer layer of clean fill on top of the impacted soil.

For petroleum impacts, the MEDEP is requiring adherence to the Hydrocarbon Spill Decision Tree (Decision Tree) Baseline 2 goal to the extent possible. The Baseline 2 goal is based on field-screening levels exceeding 200 to 400 ppm or laboratory-based Diesel Range Organics results over 50 to 100 mg/kg. The exact threshold will be determined by the MEDEP as part of their approval of a remediation work plan. Areas of impacted soil that may be encountered in the future during redevelopment shall be removed and disposed of or processed off-site if it exceeds this cleanup goal. Exceptions may include soil below utilities or the water table.

3.0 2005 PHASE I ENVIRONMENTAL SITE ASSESSMENT

3.1 Methods

St. Germain completed a Phase I ESA of the Site in 2005 consistent with the American Society of Testing and Materials (ASTM) Standard E 1527-00. This report updates this work so that it complies with the newer ASTM Standard E 1527-05 as well as "All Appropriate Inquiry" as defined under the US Environmental Protection Agency "All Appropriate Inquiry" Final Rule (40 CFR Part 312).

The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) as defined in ASTM Standard. A "recognized environmental condition" is "the presence or likely presence of any hazardous substances (i.e., as defined under CERCLA) or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The ASTM definition does not include "de-minimis" conditions, which generally do not present risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. Therefore, de-minimis conditions are not considered RECs.

3.1.1 Site Reconnaissance

St. Germain conducted an initial reconnaissance of the Site on February 9 and 14, 2005 to determine current conditions related to the following issues: petroleum and/or hazardous substances storage and handling; underground storage tanks (USTs) and aboveground storage tanks (ASTs); spills and/or dumping of petroleum and/or hazardous substances, polychlorinated biphenyl (PCB)-containing equipment or material; and solid and universal waste. St. Germain also inspected abutting properties as visible from the Site for the same conditions. In March and May 2005, in December 2006, and November 2007, St. Germain re-visited much of the Site in preparation for and during the completion of Phase II ESA work, and did not observe any new RECs.

3.1.2 Local/Historical Records Review

St. Germain reviewed municipal files at the City of Portland offices including the Assessor's and Planning Offices. These records were reviewed to identify correspondence, permits, or other documentation that may indicate the past or current presence of RECs. St. Germain also obtained Sanborn Fire Insurance Maps (see Appendix A).

3.1.3 Federal and State Records Review

Federal and State databases were first reviewed in February 2005 by using a database search provided by FirstSearch™ Technology Corporation (FirstSearch™) of Dedham, Massachusetts. The FirstSearch™ report includes information compiled from the following Federal databases: National Priority List (NPL); Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS); No Further Response Action Planned (NFRAP); Resource Conservation and Recovery Act (RCRA); Transportation Storage and Disposal (TSD);

RCRA CORRACTS (facilities subject to Corrective Action under RCRA); RCRA Generators; Emergency Response Notification System (ERNS). State databases included: landfills, registered underground storage tanks (USTs), hazardous waste sites, leaking underground storage tanks (LUSTs), spill sites, Voluntary Response Action Program (VRAP) Sites, and Tribal Lands.

Based on the database search, St.Germain subsequently reviewed regulatory files at the MEDEP office in Augusta, Maine on December 20, 2006.

The database search was updated in November 2007 and is included as **Appendix D, FirstSearch™ Report**. Reports documenting on-Site spills or releases were identified as potential RECs. No off-Site reports were identified that represented an REC for the Site because of distance, age of release, topography, and/or completed remediation actions.

3.1.4 Data Gaps, Limitations, and Additions

St.Germain did not identify data gaps that would significantly affect the completeness of this ESA. Limitations to the ASTM E 1527-00 standard consisted of the following:

- In February 2005, the ground surface was covered by six to 12 inches of snow, obscuring views of Site soils, but the Site was re-visited a few months later after the snow had melted.

As discussed in Sections 4.0, 5.0, and 7.0, Phase II ESAs were later conducted outside the ASTM E1527-05 standard.

3.2 Private Well Survey

St.Germain conducted a private well survey within 2,500 feet of the Site by obtaining a map of Portland Water District (District) transmission lines in the area, as shown in **Appendix E, Portland Water District Mains**. Based on a review of this map, local reconnaissance, and discussions with District staff, no private water wells were identified in the search radius.

3.3 Results

Based on the 2005 Phase I ESA work, St.Germain identified two RECs on the Site. Unless otherwise noted, the RECs were based on historical environmental records (Appendix B) or the FirstSearch™ report (Appendix D).

REC CP-1 (Documented Metal Impacts)

Documented elevated metal impacts to soil was considered a REC.

REC CP-2 (Historical Property Use)

The historical presence of fuel storage tanks, existence of fill material, and use of the property as a billiard ball and poker chip manufacturer were considered RECs.

4.0 2005 PHASE II ENVIRONMENTAL SITE ASSESSMENT

Field investigations were conducted in March and May 2005 to address the RECs described in the previous section.

4.1 Methods

In March 2005, St.Germain advanced 11 soil borings, installed one monitoring well, and collected 11 soil samples and one ground water sample for laboratory analysis. Using a Geoprobe drill rig operated by ESN NorthAtlantic (ESN) of Scarborough, Maine, soil borings were generally advanced to a depth of 10 to 12 feet or refusal, whichever was encountered first. Soil samples were collected continuously, classified by soil type, and field-screened for volatile organic compounds (VOCs) using a Thermo Electron Corporation 580B photo ionization detector (PID) calibrated to the MEDEP setpoint of 320 for diesel range organics. In addition, soil samples were assessed for visible and olfactory evidence of petroleum or other impacts. Soil samples exhibiting elevated PID levels were also field-tested for petroleum "saturation" using MEDEP protocol. Select samples were submitted to Maine Environmental Laboratory (MEL) in Yarmouth, Maine for analysis of diesel range organics (DRO), volatile organic compounds (VOCs), or RCRA 8 metals.

The location of the borings and analytical suite generally reflected the REC location, known or suspected type of impact, and/or PID or visual evidence of impacts. **2005 Boring Logs** are included in **Appendix F** and boring locations are shown on **Figure 4, Site Soil Boring Locations**.

On May 5, 2005, St.Germain conducted a surface soil analysis program to address the detected heavy metals in historical and the March 2005 sampling. A 50-foot grid was established across the lot (see **Figure 5, 2005 CP Parcel Surface Soil Lead Sampling Plan**). Exposed mineral soil was analyzed in place at 74 locations for total lead using an Innov X-Ray Fluorescence analyzer (XRF). Seven samples were collected from these locations and submitted to MEL for independent analysis of lead.

A summary of the borings and soil sample analyses is provided below

Summary of 2005 Soil Borings and Analysis

Parcel	Boring	DRO	VOCs	Metals
CP	B-29 to B-39	B-29, B-30, B-37, B-38	B-29, B-39*	B-31, B-32, B-33, B-34, B-35, B-36, B-37, B-39*
	1-74	None	None	Lead only**

* = ground water only.

** = most analyzed with XRF only.

St.Germain contoured the lead field results using the commercially available program Surfer Version 8.0 by first creating a synthetic grid based on the existing data using the Point Kriging method. This method represents a generic approach to contouring that does not include directional bias. The grid spacing was chosen manually with spacing in the X- and Y-direction of about 0.6 meters. Kriging can result in grid points with Z-values (i.e., lead concentrations)

above the maximum reported and can produce negative values. Therefore, the grid was further modified to eliminate negative numbers before contouring. St.Germain selected contour intervals of 375, 700, 1,000, and 2,000 mg/kg for contouring. Results are discussed in the following section.

4.2 Results

Analytical results for the March 2005 investigation are summarized on **Table 1, Soil Boring Sampling Results** and **2005 Laboratory Reports** are included as **Appendix G**. PID readings for soil borings are included on the logs in Appendix E. The surface soil field results are summarized on **Table 2, May 2005 CP Parcel Surface Soil Lead Results**.

The primary REC on the CP Lot was the documented presence of elevated metals, likely from the former use of the property as a billiard ball and poker chip manufacturer. Several of the March 2005 borings encountered brightly colored materials indicative of dyes. Eleven soil samples from varying depths were analyzed for metals and elevated arsenic and/or lead was detected in about half of the samples. A sample from a depth of 4.5 feet at B-34 exhibited a lead concentration over 100,000 mg/kg. As shown on Table 1, many of the arsenic and lead levels are above the Residential and Adult Worker/Trespasser RAGs. The single ground water sample collected on the CP Lot (B-39) did not show elevated metal concentrations and VOCs were not detected.

The data from XRF surface soil testing for lead in May 2005 are summarized on Table 2 and a contour map is provided as Figure 5. Comparison of the field results with laboratory results are summarized on **Table 3, XRF and Laboratory Results Comparison**. The average Relative Percent Difference (RPD) for the seven lead samples with laboratory results was 29%, which indicates that the XRF data were of acceptable quality based on the commonly used 30% threshold.

As discussed in Section 2.5, either the Residential or Adult Worker/Trespasser MEDEP RAG will apply for remediation, depending on the site development plans. The 375 mg/kg contour value represents the Residential RAG while 700 mg/kg represents the Adult Worker/Trespasser RAG. The contour map shows that most of Parcel CP surface soil exhibit less than 100 mg/kg. Exceptions include an isolated area at the southwest corner of the parcel where one sample showed a lead concentration slightly above 1,000 mg/kg (Sample 44), but this appears to be slightly outside the parcel boundary. Results from the surrounding samples declined rapidly. A larger area of elevated lead on the surface is present in the northeast corner, although again, a few of the sample locations appear to be just over the parcel line. Seven samples in this area exhibit lead levels over 1,000 mg/kg and concentrations over the 700 mg/kg RAG extend over an area about 100 feet by 200 feet in area.

5.0 2006 PHASE II ENVIRONMENTAL SITE ASSESSMENT

In December 2006, St.Germain completed Phase II assessments to further characterize soil impacts identified during 2005. Twenty-six geoprobe and 11 hand auger borings were advanced to assess the extent of known lead and arsenic impacts in soil (see **Figure 6, 2006/2007 CP Parcel Lead and Arsenic Soil Boring Locations**).

5.1 Methods

Soil borings were advanced using a Geoprobe drill rig operated by ESN. Borings were advanced to 10 feet or refusal, whichever was encountered first, and continuous soil samples were collected at each boring location. The soil was not classified or screened with a PID since arsenic and lead were the target contaminants. Soil samples from each two-foot interval were poured into a decontaminated plastic mixing container and homogenized with a stainless steel mixing paddle attached to a cordless drill. After mixing, the sample was qualitatively assessed for moisture content and organics. The soil sample was transferred to a poly bag, labeled, and placed on the XRF window for screening of lead and arsenic. St.Germain submitted eight confirmation samples for independent laboratory analysis to Northeast Laboratory (NEL) of Winslow, Maine. **2006 Laboratory Reports** are provided in **Appendix H**.

Because of a steep embankment, some of the samples (labeled HA) were collected with a hand auger. St.Germain advanced a pre-cleaned 6-inch long, 3.5-inch diameter stainless steel auger in 0.5 foot increments to a total depth of 4.0 feet or refusal, which ever was encountered first. Each two-foot interval was screened for lead and arsenic with the XRF as described above.

Comparison of field and laboratory results is presented on Table 3. The lead RPD for these samples was 64%, which is higher than the 30% threshold often used to assess accuracy. However, two XRF samples with reported lead concentrations over 25 mg/kg were reported by the laboratory to have levels below 10 mg/kg, hence the XRF bias was toward over-reporting the concentration. The RPD for arsenic was more difficult to assess because many of the XRF measurements were reported as below the instrument detection limit, but useable data give an RPD of 38%. Again, one XRF sample was biased high and skewed the results.

Figure 6 shows the location of the 2006 geoprobe and hand auger borings. The geoprobe borings were advanced on the same grid established for the 2005 surface soil measurements but were given the CP- designation from CP-1 to CP-26. As will be described in Section 7.0, additional borings were advanced in a similar manner in 2007 and are also shown on this figure.

5.2 Results

XRF data from the geoprobe and hand auger borings on the CP Lot are summarized on **Table 4, CP Parcel Lead and Arsenic Results**. In order to assess the feasibility of burying metal-impacted soil beneath the recreational field, additional sampling was conducted in 2007 and the combined results are discussed in Section 7.0.

6.0 2006 GEOTECHNICAL SOIL BORINGS

Seven geotechnical test borings were advanced to refusal on the Site in 2006 by R.W. Gillespie & Associates, Inc. At St.Germain's request, soil samples from each boring were screened in the field using a PID. The environmental component of their work is summarized in **Appendix I, R.W. Gillespie Memo and Data, November 7, 2006**. This report indicates that the samples from the Site did not exhibit elevated soil headspace. Visual observations suggestive of environmental impacts were limited to occasional organic odors. **Figure 7, R.W. Gillespie Geotechnical Soil Boring Locations**, shows the broad extent of the borings. The lack of evidence of significant or widespread impacts supports the focus of the St.Germain investigations of RECs identified during the Phase I ESA.

7.0 2007 PHASE II ENVIRONMENTAL SITE ASSESSMENTS

Investigations conducted in October 2007 focused on the feasibility of burying metal-impacted soil beneath the recreational field by extending the sampling area to the west.

7.1 Methods

Soil borings were advanced and samples were analyzed for lead and arsenic following the procedures described in Section 5.1 with the existing grid expanded to the west. Twenty-six new borings were advanced (CP-101 to CP-127) and the data are presented in Table 4. Concentration contour maps for each 2-foot depth interval were produced as described in Section 4.1. St.Germain submitted seven confirmation samples for independent laboratory analysis to NEL. 2007 Laboratory Reports are provided in Appendix J.

The lead RPD for the samples was 46%, which is higher than the 30% threshold. However, one XRF result was significantly higher than the associated laboratory result (25 vs. 6 mg/kg), hence the XRF bias was toward over-reporting the concentration. The RPD for arsenic was 58%. Most of the variability was biased toward high XRF readings. Overall, these data are considered of acceptable quality because of the number of samples and generally high bias for the XRF.

7.2 Results

Lead and arsenic concentration contours for each two-foot depth interval are illustrated on Figure 8, 2006/2007 CP Parcel Subsurface Soil Lead Concentrations, and Figure 9, 2006/2007 CP Parcel Subsurface Soil Arsenic Concentrations, respectively. Lead concentrations in the 0 to 2-foot and 2 to 4-foot depth intervals are similar with the highest concentrations in the northeast corner, some over 2,000 mg/kg. Another isolated area of elevated lead was also detected in the southeast corner.

All but one of the remaining samples from 0 to 4-foot interval showed lead levels below the Residential RAG of 375 mg/kg. Samples at isolated locations from the 4 to 6-foot and 6 to 8-foot intervals show lead above 375 mg/kg, in some cases in the 1,000 to 2,500 mg/kg range (B-35 and CP-10) and at one location over 100,000 mg/kg (B-34). Data from B-34 and B-35 at this depth were not used in the contouring because of the extreme variation from the nearest samples. All three of these samples (B-34, B-35, and CP-10) are located on the far east side of the parcel. None of the samples from 8 to 10 feet showed lead above 375 mg/kg.

Figure 9 indicates that arsenic concentrations are much more variable compared to lead. A few samples from all three sampled intervals between 0 and 6 feet show arsenic over 100 mg/kg. Concentrations between 30 and 100 mg/kg (above the Adult Worker/Trespasser RAG) are particularly widespread in the 4 to 6-foot depth interval. Arsenic levels decline from the 4-foot to the 10-foot depth, with most of the samples from 8 to 10 feet below the Residential RAG of 10 mg/kg.

8.0 SUMMARY

St.Germain identified the following environmental impacts on the parcel:

Parcel	Impacts	Potentially Applicable Standards	Comments
CP (City Lot)	<ul style="list-style-type: none"> ▪ Areas of high lead and arsenic in shallow soil; lower but still elevated arsenic levels widespread at depth. 	<ul style="list-style-type: none"> ▪ MEDEP RAG for Adult Worker/Trespasser for proposed retention pond at eastern side. ▪ Other areas dependent on final use of land. ▪ Lead RAGs = 375/700 mg/kg. ▪ Arsenic RAGs = 10/30 mg/kg. 	<ul style="list-style-type: none"> ▪ Isolated exceedences of both lead RAGs. ▪ Widespread exceedences of both arsenic RAGs.

9.0 LIMITATIONS

This report is based on the work scope described herein and referenced sources, and is in turn limited by the work scope and the conditions of the Site. No other warranty, expressed or implied, is indicated. This report is based upon information available at the time of this submittal. Should information not included in this report be obtained, St.Germain reserves the right to amend I findings.

Table 1
Soil Boring Sampling Results
Parcel CP
Morrill's Crossing Project
Portland, Maine

Compound		Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver	DRO	VOCs
MEDEP PRGs - Baseline 2		NS	NS	NS	NS	NS	NS	NS	NS	50-100	NS
MEDEP RAGs - AW		30	10,000	23	10,000 (Cr ⁺⁶)	700	610	10,000	10,000	NS	varies
MEDEP RAGs - R		10	10,000	27	950 (Cr ⁺⁶)	375	60	950	950	NS	varies
Lot	Sample	Depth (ft)	Date								
CP	B-29	8-12	Mar-05	NA	NA	NA	NA	NA	NA	ND	ND
CP	B-30	0-4	Mar-05	NA	NA	NA	NA	NA	NA	ND	NA
CP	B-31	0-2	Mar-05	7.2	20J	57	0.11	0.1J	ND	NA	NA
CP	B-32	0-2	Mar-05	175	2,900	4,700	0.2	ND	ND	NA	NA
CP	B-33	6-8	Mar-05	42	970	705	0.47	0.1J	ND	NA	NA
CP	B-34	4.5-4.8	Mar-05	26	490	108,200	0.14	ND	ND	NA	NA
CP	B-35	4.5-5.5	Mar-05	199	5,220	978	2.63	3.7	ND	NA	NA
CP	B-36	3.9-4	Mar-05	41	2,200	100	0.15	0.4J	ND	NA	NA
CP	B-37	0-2	Mar-05	11.5	80	50	0.07	ND	ND	NA	NA
CP	B-37	2-4	Mar-05	NA	NA	NA	NA	NA	NA	26	NA
CP	B-38	0-2	Mar-05	NA	NA	NA	NA	NA	NA	23	NA
CP	B-39	GW	Mar-05	ND	0.1J	ND	0.0003J	ND	ND	NA	ND

- 1 Data in mg/kg unless otherwise noted.
- 2 Bold = compound detected in the sample.
- 3 Shaded = exceeded the most stringent standard.
- 4 ND = Not detected above the quantification limit.
- 5 NA = Not analyzed.
- 6 NS = No Standard.
- 7 GW = ground water with data in mg/l.
- 8 J = Concentration estimated by laboratory.
- 9 MEDEP RAGs = MEDEP Remedial Action Guidelines for Contaminated Soils -- November 18, 1997. AW = adult worker, R = residential.
- 10 MEDEP PRGs = MEDEP Hydrocarbon Spill Decision Tree for Baseline 2 sites.
- 11 VOCs = Volatile Organic Compounds (EPA Method 8260).
- 12 DRO = Diesel Range Organics (HETL Method 4.1.25).
- 13 Only detected VOCs shown in Table 1. See Laboratory Reports, including quantification limits and estimated values.
- 14 Sample locations shown on Figure 4.

Table 2
 May 2005 CP Lot Surface Soil Lead Results
 Morrill's Crossing Project
 Portland, Maine

Sample Location	Lead (mg/kg)
1	33
2	27
3	39
4	48
5	44
6	83
7	192
8	2,654
9	691
10	1,651
11	930
12	208
13	95
14	56
15	88
16	34
17	11
18	52
19	39
20	57
21	35
22	110
23	196
24	2,452
25	121
26	102
27	65
28	62
29	70
30	110
31	38
32	41
33	44
34	87
35	28
36	36
37	38
38	20
39	53
40	32
41	46
42	44
43	42
44	1,073
45	50
46	68
47	20
48	28

Sample Location	Lead (mg/kg)
49	56
50	84
51	250
52	17
53	32
54	51
55	101
56	164
57	237
58	121
59	54
60	72
61	1,628
62	43
63	49
64	657
65	351
66	1,438
67	2,346
68	470
69	121
70	152
71	68
72	642
73	149
74	55

1. Data collected on May 5, 2006 using an Innov X-Ray Fluorescence analyzer.
2. Data in mg/kg.
3. Sample locations shown on Figure 5.
4. Laboratory confirmation data for XRF results in Table 3.
5. MEDEP Remedial Action Guideline Residential Standard = 375 mg/kg
6. MEDEP Remedial Action Guidelines Adult Worker/Trespasser Standard = 700 mg/kg.
7. Shaded = exceedence of most stringent standard.

Table 3
XRF and Laboratory Results Comparison
Parcel CP
Morrill's Crossing Project
Portland, Maine

Sample Date	Sample ID	Depth (ft)	Lead Results				Arsenic Results									
			XRF Result	+/-	Low	High	Analytical Result	RPD	RPD Range	XRF Result	+/-	Low	High	Analytical Result	RPD	RPD Range
5/5/05	16	Surface	34	NA	NA	NA	41	-18	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	21	Surface	35	NA	NA	NA	14	86	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	40	Surface	32	NA	NA	NA	30	8	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	37	Surface	38	NA	NA	NA	27	34	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	44	Surface	1,073	NA	NA	NA	1,185	-10	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	8	Surface	2,654	NA	NA	NA	3,040	-14	NA	NA	NA	NA	NA	NA	NA	NA
5/5/05	66	Surface	1,438	NA	NA	NA	2,070	-36	NA	NA	NA	NA	NA	NA	NA	NA
12/8/06	CP-3	2-4	39	3	36	42	9	128	123 to 132	20	2	18	22	15	29	17 to 39
12/8/06	CP-7	2-4	26	3	23	29	5	134	127 to 140	6	2	4	8	11	52	-84 to -26
12/8/06	CP-10	0-2	2,634	22	2,612	2,656	3,600	-31	-32 to -30	0	40	-40	40	43	NA	NA to -8
12/8/06	CP-13	0-2	147	4	143	151	110	29	26 to 31	16	3	13	20	10	51	28 to 68
12/8/06	CP-18	4-6	610	8	602	618	860	-34	-35 to -33	24	6	18	30	29	-20	-48 to 2
12/8/06	CP-26	6-8	68	3	65	71	140	-69	-73 to -65	0	6	-6	6	9	NA	NA to -44
12/8/06	HA-6	0-2	160	4	156	164	200	-22	-25 to -20	0	10	-10	10	2	NA	NA to 137
11/5/07	CP-108	2-4	427	7	420	434	850	-66	-68 to -65	23	5	19	28	6	116	100 to 128
11/6/07	CP-111	0-2	245	5	240	250	270	-10	-12 to -8	126	4	122	130	85	39	35 to 42
11/6/07	CP-112	2-4	110	4	106	113	140	-24	-28 to -21	29	3	26	31	34	-18	-28 to -8
11/6/07	CP-114	0-1.5	38	3	36	41	20	63	56 to 69	13	2	11	15	6	75	61 to 87
11/6/07	CP-116	0-2	46	3	43	49	54	-16	-22 to -10	8	2	6	10	6	32	5 to 52
11/6/07	CP-120	10-12	27	2	24	29	6	126	120 to 131	0	5	-5	5	0	NA	NA
11/6/07	CP-125	0-2	69	3	66	72	58	17	12 to 21	7	2	5	9	4	67	34 to 88

Notes:
RPD = relative percent difference.
data in mg/kg.
+/- = reported accuracy of XRF measurement.

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-01	0-2	7-Dec-06	28	15
	2-4	7-Dec-06	28	8
	4-5	7-Dec-06	22	39
CP-02	0-2	7-Dec-06	52	16
	2-4	7-Dec-06	31	<LOD
CP-03	0-2	7-Dec-06	82	9
	2-4	7-Dec-06	39	20
CP-04	0-2	7-Dec-06	475	21
	2-4	7-Dec-06	140	15
CP-05	0-2	7-Dec-06	865	66
	2-4	7-Dec-06	41	16
CP-06	0-2	7-Dec-06	48	8
	2-4	7-Dec-06	40	<LOD
	4-6	7-Dec-06	480	23
	6-8	7-Dec-06	20	8
	8-10	7-Dec-06	30	<LOD
CP-07	0-2	7-Dec-06	47	<LOD
	2-3.5	7-Dec-06	26	6
CP-08	0-2	7-Dec-06	293	19
	2-4	7-Dec-06	30	18
	4-5	7-Dec-06	43	33
CP-09	0-2	7-Dec-06	1526	138
	2-3.5	7-Dec-06	46	<LOD
CP-10	0-2	7-Dec-06	2634	<LOD
	0-2	7-Dec-06	2102	<LOD
	2-4	7-Dec-06	2451	116
	4-5	7-Dec-06	2391	56
CP-11	0-2	7-Dec-06	69	<LOD
	2-4	7-Dec-06	171	19
	4-6	7-Dec-06	50	33
	6-8	7-Dec-06	29	<LOD
	8-10	7-Dec-06	26	7
CP-12	0-2	7-Dec-06	54	9
	2-4	7-Dec-06	22	<LOD
CP-13	0-2	7-Dec-06	147	16
	2-4	7-Dec-06	42	30
CP-14	0-2	7-Dec-06	93	<LOD
	2-4	7-Dec-06	37	<LOD
CP-15	0-2	7-Dec-06	58	<LOD
	2-4	7-Dec-06	23	<LOD
	4-6	7-Dec-06	26	9
	6-8	7-Dec-06	14	5
	8-10	7-Dec-06	15	8
CP-16	0-2	7-Dec-06	42	20
	0-2	7-Dec-06	43	21
	2-4	7-Dec-06	24	18
CP-17	0-2	7-Dec-06	103	13
	2-4	7-Dec-06	38	34
	4-6	7-Dec-06	28	49
	6-8	7-Dec-06	97	23
	6-8	7-Dec-06	100	21
	8-10	7-Dec-06	10	7
	8-10	7-Dec-06	12	6

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-18	0-2	8-Dec-06	53	15
	2-4	8-Dec-06	87	10
	4-6	8-Dec-06	610	24
	6-8	8-Dec-06	71	12
	8-10	8-Dec-06	25	10
CP-19	0-2	8-Dec-06	58	10
	2-4	8-Dec-06	43	<LOD
	4-6	8-Dec-06	337	58
	6-8	8-Dec-06	485	25
	8-10	8-Dec-06	28	7
CP-20	0-2	8-Dec-06	28	7
	2-4	8-Dec-06	67	<LOD
	4-5.5	8-Dec-06	72	16
CP-21	0-2	8-Dec-06	74	<LOD
	2-4	8-Dec-06	354	38
	4-6	8-Dec-06	50	7
	6-8	8-Dec-06	26	10
	8-10	8-Dec-06	23	12
CP-22	0-2	8-Dec-06	100	10
	2-4	8-Dec-06	218	18
	4-6	8-Dec-06	252	26
	6-8	8-Dec-06	54	11
	8-10	8-Dec-06	29	9
CP-23	0-2	8-Dec-06	44	8
	2-4	8-Dec-06	112	37
	4-6	8-Dec-06	527	30
	6-8	8-Dec-06	107	13
	8-10	8-Dec-06	31	<LOD
CP-24	0-2	8-Dec-06	53	8
	2-4	8-Dec-06	364	25
	4-6	8-Dec-06	708	65
	6-8	8-Dec-06	31	<LOD
	8-10	8-Dec-06	26	6
CP-25	0-2	8-Dec-06	43	10
	2-4	8-Dec-06	115	11
	4-6	8-Dec-06	231	19
	6-8	8-Dec-06	33	<LOD
	8-10	8-Dec-06	28	<LOD
CP-26	0-2	8-Dec-06	28	9
	2-4	8-Dec-06	116	20
	4-6	8-Dec-06	188	14
	6-8	8-Dec-06	68	<LOD
	8-10	8-Dec-06	29	<LOD
CP-101	0-2	5-Nov-07	228	32
	2-4	5-Nov-07	355	<LOD
	4-6	5-Nov-07	65	<LOD
	6-8	5-Nov-07	27	<LOD
	8-10	5-Nov-07	29	<LOD
CP-102	0-2	5-Nov-07	186	14
	2-4	5-Nov-07	22	<LOD
	4-6	5-Nov-07	27	<LOD
	6-8	5-Nov-07	22	6
	8-10	5-Nov-07	11	15

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-103	0-2	5-Nov-07	258	23
	2-4	5-Nov-07	23	7
	4-6	5-Nov-07	15	5
	6-8	5-Nov-07	15	8
	8-10	5-Nov-07	22	5
CP-104	0-2	5-Nov-07	33	<LOD
	2-4	5-Nov-07	24	<LOD
	4-6	5-Nov-07	19	<LOD
	6-8	5-Nov-07	19	<LOD
	8-10	5-Nov-07	18	7
CP-105	0-2	5-Nov-07	20	<LOD
	2-4	5-Nov-07	15	<LOD
	4-6	5-Nov-07	25	5
	6-8	5-Nov-07	25	<LOD
	8-10	5-Nov-07	23	<LOD
CP-106	0-4	5-Nov-07	42	<LOD
	4-6	5-Nov-07	70	7
CP-107	0-2	5-Nov-07	40	8
	2-4	5-Nov-07	24	<LOD
	4-6	5-Nov-07	30	11
	6-8	5-Nov-07	27	<LOD
	8-10	5-Nov-07	22	<LOD
CP-108	0-2	5-Nov-07	17	14
	2-4	5-Nov-07	427	23
	4-6	5-Nov-07	43	9
	6-8	5-Nov-07	24	<LOD
	8-10	6-Nov-07	19	22
CP-109	0-2	6-Nov-07	98	10
	2-4	6-Nov-07	23	<LOD
	4-5	6-Nov-07	24	6
	5-6	6-Nov-07	21	47
CP-110	0-2	6-Nov-07	102	22
CP-111	0-2	6-Nov-07	245	126
	2-4	6-Nov-07	215	47
	4-6	6-Nov-07	142	62
	6-8	6-Nov-07	91	69
CP-112	0-2	6-Nov-07	106	17
	2-4	6-Nov-07	110	29
	4-6	6-Nov-07	84	18
	6-8	6-Nov-07	197	23
	8-10	6-Nov-07	61	23
	10-12	6-Nov-07	26	12
CP-113	0-2	6-Nov-07	34	9
	2-4	6-Nov-07	44	19
	4-6	6-Nov-07	20	7
	6-8	6-Nov-07	21	7
	8-10	6-Nov-07	9	9
	10-12	6-Nov-07	26	7
CP-114	0-1.5	6-Nov-07	38	13
	1.5-3	6-Nov-07	43	<LOD
CP-115	0-1	6-Nov-07	24	11
CP-116	0-2	6-Nov-07	46	8
	2-4	6-Nov-07	31	9
	4-6	6-Nov-07	19	5

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
CP-117	0-2	6-Nov-07	94	<LOD
	2-4	6-Nov-07	31	<LOD
	4-6	6-Nov-07	21	<LOD
	6-8	6-Nov-07	16	7
	8-10	6-Nov-07	23	<LOD
	10-12	6-Nov-07	21	<LOD
CP-118	0-2	6-Nov-07	54	6
	2-4	6-Nov-07	86	25
	4-6	6-Nov-07	21	<LOD
	6-8	6-Nov-07	20	<LOD
	8-10	6-Nov-07	14	<LOD
	10-12	6-Nov-07	15	17
CP-119	0-4	6-Nov-07	44	7
	4-8	6-Nov-07	31	8
	8-10	6-Nov-07	15	15
	10-12	6-Nov-07	26	<LOD
CP-120	0-2	6-Nov-07	172	<LOD
	2-4	6-Nov-07	161	<LOD
	4-6	6-Nov-07	19	6
	6-8	6-Nov-07	23	<LOD
	8-10	6-Nov-07	16	8
	10-12	6-Nov-07	27	<LOD
CP-121	0-2	6-Nov-07	24	<LOD
	2-4	6-Nov-07	21	<LOD
	4-6	6-Nov-07	17	8
	6-8	6-Nov-07	23	<LOD
	8-10	6-Nov-07	25	12
CP-122	0-2	6-Nov-07	34	<LOD
	2-4	6-Nov-07	19	<LOD
	4-6	6-Nov-07	19	6
	6-8	6-Nov-07	26	10
	8-10	6-Nov-07	19	<LOD
	10-12	6-Nov-07	22	<LOD
CP-123	0-4	6-Nov-07	25	<LOD
	4-6	6-Nov-07	22	8
	6-8	6-Nov-07	27	6
	8-10	6-Nov-07	24	<LOD
CP-124	0-4	6-Nov-07	86	10
	4-6	6-Nov-07	57	7
	6-8	6-Nov-07	27	6
	8-11	6-Nov-07	23	7
CP-125	0-2	6-Nov-07	69	7
	2-4	6-Nov-07	20	7
	4-8	6-Nov-07	76	18
	8-10	6-Nov-07	25	6
	10-12	6-Nov-07	20	<LOD
CP-126	0-3	6-Nov-07	33	9
CP-127	0-2	6-Nov-07	26	9
	2-4	6-Nov-07	26	<LOD
HA-01	0-2	13-Dec-06	718	29
HA-02	0-0.25	13-Dec-06	1398	33
HA-03	0-1	13-Dec-06	91	9

Table 4
 CP Parcel Lead and Arsenic Results
 Morrill's Crossing Project
 Portland, Maine

			Lead	Arsenic
MEDEP Residential RAG			375	10
MEDEP Adult Worker/Trespasser RAGs			700	30
Sample ID	Depth	Date		
HA-04	0-2	13-Dec-06	219	13
	2-3	13-Dec-06	22	<LOD
HA-05	0-2	13-Dec-06	95	25
	2-4	13-Dec-06	124	16
HA-06	0-2	13-Dec-06	160	<LOD
	2-4	13-Dec-06	136	<LOD
HA-07	0-0.55	13-Dec-06	174	32
HA-08	0-1.5	13-Dec-06	164	18
HA-09	0-0.5	13-Dec-06	432	<LOD
HA-10	0-2	13-Dec-06	179	32
	2-4	13-Dec-06	272	16
HA-11	0-0.5	13-Dec-06	330	28
B-31	0-2	5-Mar-05	57	7

Notes:

Maximum depth reflects refusal or 10 feet, whichever encountered first.

Shaded = exceeded most stringent standard.

NA = not analyzed

ND = not detected above listed limit

<LOD = below limit of detection of XRF

Laboratory confirmation data for XRF results in Table 3.

See Figure 6 for sample locations.

846 Main St., Suite 3
Westbrook, Maine 04092
Telephone 207-591-7000
Facsimile 207-591-7329
info@stgermain.com



January 25, 2008

Nicholas J. Hodgkins
Maine Department of Environmental Protection
BRWM-VRAP Program
17 State House Station
Augusta, Maine 04333-0017

Re: Voluntary Response Action Program Application
Parcel CP
Morrill's Crossing Project
Allen Avenue, Portland, Maine
St.Germain File No.: 2594.5

Dear Nick:

On behalf of MC Portland LLC, St.Germain & Associates, Inc. (St.Germain) is submitting the attached Maine Department of Environmental Protection (MEDEP) **Voluntary Response Action Program (VRAP) Application (Attachment A with fee)** for the above-referenced property (Site) in Portland, Maine. The Site is one of five parcels that are part of the approximately 20-acre Morrill's Crossing redevelopment project located just east of the intersection of Allen Avenue and Forest Avenue. **Figure 1, Site Redevelopment Plan**, shows the overall development plan and the Site. This parcel comprises the following municipal properties:

City of Portland Tax Map Information

Parcel Designation	Tax Map	Tax Block	Lot Number	Owner	Area (acres)
CP (aka City Lot)	151A	A	13 (full)	City of Portland	3.1

The Site is currently vacant and is characterized by a mix of open fields and woods. The Portland Water District provides drinking water and public sewer service to the surrounding area.

Environmental assessments conducted over the past three years are described in **Attachment B, Parcel CP Site Investigation Report**. This report includes a Phase I Environmental Site Assessment (ESA) consistent with the American Society of Testing and Materials (ASTM) Standard E 1527-05, as well as "All Appropriate Inquiry" as defined under the US Environmental Protection Agency "All Appropriate Inquiry" Final Rule (40 CFR Part 312).

SUMMARY OF SITE INVESTIGATION RESULTS

Conditions initially identified on this Site that warranted further assessment consisted of former, high-risk land use (e.g., billiard ball and poker chip manufacturer) and documented lead and arsenic impacts in soil. Several phases of test borings identified areas of elevated lead and arsenic in soil on the eastern half of the Site.

PROPOSED REMEDIAL ACTIONS

Cleanup Standards

At a meeting with St.Germain on October 4, 2007, Brian Beneski of the MEDEP stated the MEDEP Remedial Action Guideline (RAG) for Residential or Adult Worker/Trespasser would apply to the Site for the elevated lead and arsenic in soil (lead RAGs = 375 or 700 mg/kg and arsenic RAGs = 10 or 30 mg/kg). The specific standard would depend on the proposed land use and the implementation of institution controls.

Petroleum impacts were not identified on this parcel. However, at the same meeting, the MEDEP agreed that the Hydrocarbon Spill Decision Tree Baseline 2 guideline would apply to petroleum impacts that may be encountered during redevelopment of the Site. We propose using the Baseline 2 field screening threshold of 400 ppm (as measured by a qualified environmental professional with a photoionization detector (PID) calibrated to the MEDEP fuel oil standard). The MEDEP will be contacted if suspected petroleum hydrocarbon impacts are encountered at levels exceeding the Baseline 2 guideline.

Remedial Methods and Timing

Soil impacted with lead and arsenic will remain on-Site but will be isolated using engineering and institutional controls. The Site has two distinct redevelopment plans: the eastern 1/2 of the Site will be used for stormwater detention ponds while the western 1/2 will be occupied by a recreation field and associated parking (see Figure 1).

For the detention pond area, post-redevelopment surfaces with soil with lead or arsenic concentrations above the Adult Worker/Trespasser RAG (700 and 30 mg/kg, respectively) will be buried under 12 inches of fill, then vegetated or covered with rip rap. Soil with metal concentrations below the Adult Worker/Trespasser RAGs will be used for construction of the ponds without restriction but will be covered with rip rap or vegetated, depending on the location. The pond will be surrounded with fencing.

Post-redevelopment soil surfaces on the proposed recreation field site with lead or arsenic concentrations above the Residential RAG, as well as excess lead/arsenic-impacted soil generated from the detention pond construction, will be buried beneath the field under 12 inches of vegetated fill, building foundations, or asphalt pavement upon completion of redevelopment. Soil requiring isolation may be temporarily stockpiled before being replaced on-Site. This procedure may also require the temporary removal of clean soil, placement of impacted soil, and then replacement of fill.

Close coordination with the redevelopment contractor will be required to ensure that the impacted soil is handled, staged, and isolated in an efficient and safe manner. A redevelopment

contractor has not yet been selected, and it is possible that Site redevelopment plans may be slightly modified before the work is initiated. Therefore, St.Germain proposes to provide the MEDEP with a Remediation Work Plan for the management of metal-impacted soil at least two weeks prior to initiation of Site redevelopment, once a contractor has been hired and the redevelopment plans finalized. At a minimum, this plan will include the following details:

- Health and Safety Plan
- Metal-impacted soil volume estimates
- Soil staging procedures (if necessary) and erosion control methods
- Dewatering procedures (if necessary)
- Post-remediation confirmatory sampling methods
- Planned final location of isolated soils and type of engineering controls

No petroleum-impacted soil has been identified that will need to be removed. If petroleum impacts are found, the soil exceeding the Baseline 2 goal will be removed with an excavator and either temporarily staged on-Site in roll-off containers or live-loaded for off-Site disposal. St.Germain will notify the MEDEP no later than two weeks before excavation if petroleum-impacted soil is identified that warrants removal.

Removal Boundaries

Soil with elevated arsenic or lead levels will only be handled if necessary for Site regrading, and in all cases will be isolated on-Site using engineering controls. Therefore, measurement of the metal concentrations in excavations will not be needed. Instead, an XRF field survey of metal concentrations conducted by a qualified environmental professional will be conducted: 1) on the post-regrading detention pond surfaces that will be vegetated or covered with rip rap, to ensure that the surface does not exceed the Adult Worker/Trespasser RAG, and 2) on the post-regraded recreational field surfaces that will be vegetated or landscaped, before loam and seed or other landscaping material is placed, to ensure that any fill used to cap soil exceeding the Residential RAG has lead and arsenic levels below the RAG.

Horizontal excavation boundaries will be defined by a qualified environmental professional collecting representative soil headspace measurements of less than 400 ppm. Exceptions will include areas where removal of impacted soil could threaten the structural integrity of buildings, or damage buried utilities. Vertical excavation boundaries will be defined by representative soil headspace measurements of less than 400 ppm, or the water table, whichever is encountered first. Excavated areas will be backfilled.

Waste Characterization and Disposal

If metal-impacted soil cannot be reused on-Site, off-Site disposal options will be evaluated based on the quantity of soil and chemistry of the impacts.

For petroleum impacts where no tanks were known to exist, the soil will be tested as required by CPRC, Inc. Group (CPRC) of Scarborough, Maine with the intention of recycling it. If the soil does not meet the CPRC standards, other disposal options will again be evaluated based on the quantity of soil and chemistry of the impacts.

Monitoring Well Abandonment

St.Germain will abandon any remaining monitoring wells on the Site by removal and/or grouting.

REPORTING AND DOCUMENTATION

As discussed above, a Remediation Work Plan will be submitted to the MEDEP at least two weeks before initiation of Site redevelopment.

Upon completion of the redevelopment, St.Germain will prepare a Site Remediation Report documenting the methods and location of soil removal or relocation, soil volumes, maps, confirmatory sampling, and disposal documentation, if necessary. St.Germain anticipates that the Site will be classified as Tier I with respect to the MEDEP VRAP Public Communication Matrix, and therefore public communication will be limited to public listing of the Site by the MEDEP on their "Sites List Database". This report will be submitted to the MEDEP with the request that a Certificate of Completion be prepared for the VRAP applicant. The applicant will then prepare an Environmental Covenant with appropriate activity and use limitations which will include:

- 1) No ground water drinking supply wells will be located on the Site.
- 2) Site use will be restricted to commercial, recreational, or industrial activities unless prior approval is given by the MEDEP.
- 3) If future Site activities require removal or penetration of the engineering controls in a manner that would lead to prolonged and direct contact with soil with lead or arsenic concentrations above the Adult Worker/Trespasser RAG, the MEDEP will be notified beforehand and provided with a Health and Safety Plan that will be made available to site workers that will address the potential risk.
- 4) If encountered, petroleum impacts left in place because of buildings or utilities, but later made accessible due to building or utility removal, will be excavated following the Baseline 2 guidelines. MEDEP will be notified prior to this activity.

SCHEDULE

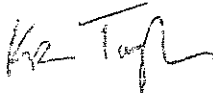
Site redevelopment is scheduled to occur during 2008/2009. St.Germain will provide the MEDEP with the Remediation Work Plan at least two weeks before redevelopment begins. A Site Remediation Report will be prepared within eight weeks of completion of the remediation work.

SUMMARY

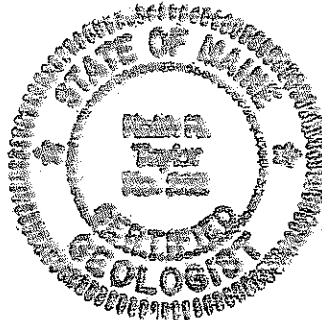
Based on the ESA work and the proposed remedial actions, we request a No Action Assurance Letter under the VRAP. If you have any questions regarding this application, please do not hesitate to contact us.

Sincerely,

ST.GERMAIN & ASSOCIATES, INC.



Keith R. Taylor, C.G.
Senior Hydrogeologist



Scott D. Collins, P.E.
Vice President

Attachments

cc: MC Portland, LLC
John Hession, VHB
Natalie Burns, Esq., Jensen Baird
Linda Costanzo, Stop & Shop
Bill Bullard, MEDEP (all except VRAP application and fee)

Appendix F

MDEP Spill Reports

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
OIL & HAZARDOUS MATERIALS REPORT

Spill Number: P-103-1999

Report Status: Final Report

MCD Town: PORTLAND
Local Name: PORTLAND
Primary Responder: JOHN M DUNLAP
Primary Product: #2 Fuel Oil {02} - 1 gals. ESTIMATE
Subject/Owner: -BURT COMP-

I. EVENT

Spill Info

Type Oil Incident {O}
Source Storage Unit - Aboveground Storage Tank {TA}
Cause Other - Unknown {18}

Spill Date/Time

02/09/1999 (Time Unknown)

Reporter Type/Detection Method

Type Subject/Spiller {2}
Method Visual Product {L}

Reported Date/Time

02/09/1999 12:00

Subject/Owner (Potential Responsible Party)

Contact BURT COMP--
1 CAMBRIDGE ST
PORTLAND ME USA
207

Comment

Reporter

Contact BURT COMP--
1 CAMBRIDGE ST
PORTLAND ME USA
207

Comment

Primary Responder and Other Employees

JOHN M DUNLAP (Primary Responder)

No Further Response Action Expected

II. SITE

Location

Location Type Residential - Single Family {SF}
Name BURT COMP
Street Address 1 CAMBRIDGE ST
MCD Town PORTLAND
Local Name PORTLAND
State/Province ME

Spill Point

UTM North
UTM East

Wells and Media Affected

Wells Affected 0 Wells Impacted / 0 Wells At Risk
Media Affected Land{L}

Tanks Involved

Above Ground Tank(s) Involved-Tank Inside

III. CLEANUP**Product Reported**

#2 Fuel Oil {02}

Cleanup DTREE**Products Found/Amount Spilled**

#2 Fuel Oil {02}/ - 1 gals. ESTIMATE (Primary Product)

Material Recovered

None {NO} - 0 gals. ESTIMATE

Recovery/Treatment Method.

None {K}

Disposal Information

N/A

IV. NARRATIVE

It was reported to the department by Burt Comp he discovered a small discharge from his inside AST, though the cause is unknown. Approximately 1 gallon of #2 fuel oil was discharged to the basement floor which appeared to be basically a stain. No clean-up was deemed necessary.

No further action required.

V. ATTACHMENTS**Attachment Type****Description****File Name**

**MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
OIL & HAZARDOUS MATERIALS REPORT FORM**

Spill Number P - 487 - 95

SUBJECT / OWNER OR OPERATOR

Name (Last, First, MI): MORRILL ST. ASSOCIATES

Address: 91 BELL ST, PO BOX 10958

Town: PORTLAND

State: ME Zip: 04104

Telephone: (207) 797-7535

Comments: IN 1987 OR 88 ONE OR MORE USTS WERE REMOVED. CONTAM. WAS REPORTED TO THE DEP AND AN UNKNOWN LEVEL OF CLEAN-UP WAS CONDUCTED ALLOWING AN UNKNOWN LEVEL OF CONTAM. IN THE GROUND, HOWEVER NO DEP DOCUMENTATION COULD BE LOCATED--SEE NARRATIVE

LOCATION / FACILITY INFORMATION

Spill Location: M.L. BREWER FINE WOODWORKING INC.

Address: 91 BELL STREET

Location ID: 22333

Town: PORTLAND

Zip: 04103

Latitude N: / /

Longitude W: / /

SPILL / EVENT INFORMATION

Spill Type: E (Table A)

Amount Spilled: 0.00

G (Gals, Yds³, Lbs or Bbls)

Product Reported Spilled: 00 (Table B)

Product Actually Found: 00 (Table B)

Date Of Spill: Jun. 09, 1995

Time Of Spill: (Military)

Date Reported: Jun. 09, 1995

Time Reported: (Military)

Cause Of Spill: 00 (Table C)

Detection Method: 2 I (Table D)

Incident Code: A - CM - N - U (Table E)

DEP response time involved: 15.5

Wells At Risk: 0

Wells Impacted: 0

Investigators' names : THOMPSON, NATHAN

JAN 17 ENTU
....

PERSON REPORTING EVENT

Name (Last, First, MI): BREWER, MALCOLM OF ML BREWER FINE WOODWORKING INC.

Address: 91 BELL STREET

Town: PORTLAND

State: ME Zip Code: 04103

Telephone: (207) 797-0973

CLEAN-UP INFORMATION

Spill Number P - 487 - 95

Total Product Recovered : 25.99 G (Gals, Yds3, Lbs, Tons or Bbls)

Method of Recovery : A

Non Recyclable : 25.99 G (Gals, Tons or Bbls)

Solids Combustible : (Yds3 or Tons)

Solids Non Combustible : Yds3

Recyclable : 0.0 G (Gals, Yds3, Lbs, Tons or Bbls)

Number Filters Installed : 0

Number Aerators Installed : 0

Disposal Information : SEACOAST OCEAN SERV., PORTLAND, FOR CONTENTS OF UST.

OTHER ACTIONS

Expenditure (s) - From Surface Water Fund N (Y or N)
 From Ground Water Fund N (Y or N)
 From Haz Waste Fund N (Y or N)

Third Party Damage Claim Expected N (Y or N)

Enforcement Referral N (Y or N)

Insurance Fund Claim N (Y or N)

Tech Services Referral N (Y or N)

UNDERGROUND TANKS INFORMATION

UNO/UST Site Number	Tank Number	Size Of Tank	Tank Material	Tank Age	Piping Material	Tank Status
19159 -	1	550	A	8	M	AB

Please use separate sheets of paper, as needed, for your detailed Recommendations and Spill Narrative. Remember to include/attach directions to find spill site (with a map if possible), all observations made, clean up actions performed and photos (if taken).

Include known chemical names when report is about Hazardous Materials.

Please, document your information carefully. It may be needed for future reference or legal action.

P-487-95/22333/Portland

5

9 Jun 94, I met w. Rusty Brewer of M.R. Brewer Fine Woodworking, Inc. [91 Bell St., Portland 04103 (207-797-7534)] in ref. to environ. issues on his property that were presented to Brewer by the lending institution he was working w. on a loan. Some of the issues included gas. contam. soil that resulted in a 1987 or 1988 (dep rec. indicate a 1989 remov.) UST remov.; possible existence of an additional UST on site; PCB contam. or a PCB transform. on site; a pile of ash; and an enclosed AST that is no longer in use. The bottom line was that Brewer would not get a loan unless these issues were addressed. I reviewed a phase two or three site assessment fr. an environ. consultant. After a general review of the assessment I determined that action by Response Services was not warranted. I ref. Brewer to the Dept.'s V-Rap program.

14 Aug 95, I met w. Rusty Brewer concerning the same issues. I have no idea what resulted betw. Brewer and the V-Rap program. Brewer expressed urgency in having the issues resolved in order to rece. the loan. Brewer inform. me that he had hired a contrac. to remov. contam. soil as was being required by the bank. I inform. Brewer that the bank could not hold them hostage and that if the state gave the site a clean bill of health that there should be no problem. On 15 Aug 95, I stopped by Brewer's place and asked him to contac. the bank and find out what specifically it was the bank wanted. Brewer contac. me 15 Aug 95, and said that if the DEP gave an OK on the site that the bank would be satisfied. I could not locate a spill report for this site, but I did locate records that a DEP response had taken place in 1989 as a result of two UST's being remov.

15 Aug 95, I vis. the site and loc. an additional UST that I believed to contain gasoline and water. I authorized the immediate removal of the UST. A cert. tank installer, haz. waste transp., and a site assessor were contrac. by Brewer and the UST remov. Dig safe and CMP had also been notified prior, and CMP installed a pole support for the remov. of the UST.

I completed a DEP Dec. Tree and determ. the site a baseline-1 clean-up std., which calls for the removal of free phase product and saturated soil I excav. three test pits in the area of the 1989 UST remov. project and conduc. soil saturation tests of the effected soil. The results were negative and the tests pits were back-filled. I conduc. soil saturation tests in the excav. of the UST remov. this day. The results were negative and the excav. was back-filled (dia. next pg.).

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
OIL & HAZARDOUS MATERIALS REPORT

Spill Number: P-796-2012

Report Status: Final Report

MCD Town: PORTLAND
Local Name: PORTLAND
Primary Responder: STEPHEN L FLANNERY
Primary Product: #2 Fuel Oil {02} - 0 gals. ACTUAL
Subject/Owner: MORRILL STREET ASSOCIATES, INC. - -

I. EVENT

Spill Info

Type Oil Incident {O}
Source Storage Unit - Underground Storage Tank {TU}
Cause Other - No Cause {00}

Spill Date/Time

Date and Time Unknown

Reporter Type/Detection Method

Type Contractor/Consultant {6}
Method Tank and/or Piping Removal {J}

Reported Date/Time

09/19/2012 16:30

Subject/Spiller (Potential Responsible Party)

Contact --MORRILL STREET ASSOCIATES, INC.
91 BELL STREET
PORTLAND ME 04104 USA
207-797-7534

Comment

Reporter

Contact --ST GERMAIN & ASSOC
846 MAIN ST
WESTBROOK ME 04092 USA
207-591-7000

Comment

Primary Responder and Other Employees

STEPHEN L FLANNERY (Primary Responder)

II. SITE

Location

Location Type Business - Commercial {CM}
Name MORRILL STREET ASSOCIATES, INC.
Street Address 91 BELL STREET
MCD Town PORTLAND
Local Name PORTLAND
State/Province ME

Spill Point

UTM North
UTM East

Wells and Media Affected

Wells Affected / 0 Wells At Risk
Media Affected None {N}

Tanks Involved

Underground Tank(s) Involved-

III. CLEANUP**Product Reported**

#2 Fuel Oil {02}

Cleanup DTREE**Products Found/Amount Spilled**

#2 Fuel Oil {02}/ - 0 gals. ACTUAL (Primary Product)

Material Recovered

Unspilled Product {VP} - 1,500 gals. ESTIMATE

Mixed Liquid Media {MM} - 200 gals. ESTIMATE

Recovery/Treatment Method:

Sorbents {C}

Vacuum Trucks {A}

Disposal Information

Waste disposed of by Clean Harbors.

IV. NARRATIVE

I became involved with the incident, due to the issuance of an "Abandonment of (an) Underground Tank in Place". On September 9, 2012, I determined the underground storage tank (UST) met the criteria of an abandonment in place. The UST still contained #2 fuel oil, which was scheduled to be removed by Clean Harbors, in addition to cleaning the UST.

On 9/27/12, Clean Harbors was on-site removing the oil from the tank, but was unable to clean the tank for inspection.

On 10/1/12, Clean Harbors and St. Germain & Collins Environmental Consulting Group were on-site. The tank was cleaned and inspected. Tank was intact with no hole observed. In addition, no oil was observed on the groundwater adjacent to the tank. Considering the tank was situated in a concrete vault and no oil was observed on the groundwater, no samples under the tank were required.

For further details see, "Underground Storage Tank Closure Assessment Report, Morrill Street Associates, Inc., 91 Bell Street, Portland, ME, File #3372.1".

No further response action required.

V. ATTACHMENTS

<u>Attachment Type</u>	<u>Description</u>	<u>File Name</u>
Paper Attach	Abandonment of (an) Underground Tank in Place	

Appendix G

Historical Environmental Records



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 28, 2008

Mr. John Tewhey
Tewhey Associates
P.O. Box 238
Gorham, ME 04036

RE: Former Merrill Industries Site, Forest Avenue, Portland, Maine

Dear John:

This is written in response to the request made in the Triennial Water Quality Monitoring Report for 2007 prepared by Tewhey Associates to curtail the triennial sampling and to close the DEP Order of 2/92.

Based on this request I reviewed the file and, accompanied by you, made a visit to the Site on April 24, 2008. Based on this review and site visit I prepared the enclosed Decision Document which agrees with your recommendation to curtail triennial sampling. The DEP Order of 2/92, however, remains in effect and will remain in effect until terminated by DEP per the process described in paragraph 52 of the AOC. The basis for this decision is provided in the Decision Document.

This has been a long process, but it is encouraging to know that the enhanced flushing initiated as a remedial measure has proved effective.

If you have any questions or comments, please contact me at 207-287-4850.

Sincerely,

Hank Aho
Manager, State Uncontrolled Sites Program

Cc: David Wright, Director, Division of Remediation

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

NO FURTHER ACTION (NFA) DECISION DOCUMENT

Division of Remediation (DOR)
Bureau of Remediation and Waste Management

SITE: Merrill Transport

Location: Forest Ave. or 250 Read St., Portland, Maine

For Uncontrolled Hazardous Substances Sites listing purposes only. Check the one that Applies:

No Further Action but remains on Remediation List of Sites.

No Further Action but remains on Remediation List of Sites and has Land Use Control (LUC) or other maintenance/reporting requirement.

No Further Action - DELISTED (removed from Division of Remediation Sites List)

I. PURPOSE

Based on current site information, the DOR has determined that further investigation and active remediation of this site is not warranted. A passive groundwater flushing system is in place and shall remain until a decision to terminate operations is made per the February 1992 Administrative Order by Consent (AOC) made between Merrill Industries, Four-Eighty-Corp, and the State of Maine. The purpose of this status report is to provide the rationale and documentation for a no further action (NFA) other than compliance with on-going LUCs designation for Merrill Transport Site, Forest Avenue or 250 Read Street, Portland.

II. PERTINENT SITE INFORMATION

A. Discovery: In December 1985, the Liberty Group (a real estate development group) arranged for Robert G. Gerber, Inc., of Freeport, Maine, to conduct an environmental audit of the Site. Later, Merrill Transport (Merrill) arranged for Geotechnical Engineers, Inc. (GEI), of Winchester, MA to perform similar environmental assessment. The results of these investigations revealed the presence of volatile organic compounds (VOCs) in the soil and groundwater. The highest concentrations of hazardous substances in soil and groundwater occurred at the location of the unlined holding pit, which had been filled in prior to these investigations. This discovery was brought to the attention of the DEP.

B. Source(s) of potential hazardous substance release: An unlined holding pit.

C. Pathway of hazardous substance migration: Hazardous substances released into the pits leached out contaminating adjacent soils and groundwater.

D. Impacted resources: On-site soil and groundwater. The groundwater also discharged by seepage to a City of Portland sewer that runs through the Site.

E. Remedial activities: The on December 29, 1986 and January 6, 1987 Merrill arranged for the removal and proper disposal (off-site) of the soil in the immediate vicinity of the unlined holding pit containing the highest concentrations (>100 mg/kg) of total organic compounds. Approximately 120 cubic yards of contaminated soil was removed.

F. Additional remedial activities that were developed and implemented included:

1. Excavation of certain areas with on-site land-farming;
2. Implementation of enhanced flushing to accelerate the rate of percolation of natural precipitation through on-site soils; and,
3. Groundwater monitoring.

G. AOC - These activities were memorialized and agreed to in an administrative order by consent (AOC) signed February 11, 1992 by P.D. Merrill (for Merrill Industries, Inc) and Henry Bouchard (481 Corp.).

H. Remedial Activities & RAGs - Section V of the AOC identifies the specific necessary actions and remedial action goals (RAGs). The details of the comprehensive remedial action can be found in the documents identified in Paragraph 24 of the AOC.

I. RAGs - For the purpose of this decision documents, the remedial action goals (Section V, Paragraph 31 of the AOC) are described as follows (see Attachment 1):

1. "After either and both of (1) completion of the soil remediation activities as described in the work plans for Zone B, the holding pit, and the CB location, identified in Paragraph 30 (A) and (2) the receipt of data indicating that the down gradient groundwater monitoring wells in either Zone A or Zone B, have reached background as defined in this Agreement under Paragraph 30[see below], any Respondent may inform DEP of such in writing. The DEP shall then assess the activities or data. If the DEP finds that the soil remediation activities have been performed in accord with the approved plans or the groundwater monitoring data indicate that background has been achieved in either Zone A or Zone B, the DEP shall issue a certificate of completion for that portion of the remedial work. Respondents shall provide test results indicating that a certificate of completion shall be issued, and DEP shall respond in writing within 30 days by issuing or denying a certificate of completion in writing providing DEP's reasons for such a denial.

2. Zones C and D are not subject to further remedial action under this Agreement and therefore remediation activities are certified complete for these zones.

J. Paragraph 30.C.1. Ground Water Monitoring states:

1. "The target cleanup level established by the DEP for this site for groundwater is the higher of either drinking water maximum exposure guideline, as adopted in the letter from Dr. Robert Frakes, [Maine] Department of Human Services dated May 30, 1990 or the background level of groundwater entering the site) described in Paragraph 30.C.3. below) based on previous sampling at a number of monitoring wells."

K. Paragraph 30.C.3. reads:

1. "For groundwater. background is 30 ppb total VOC's or 10 ppb chlorobenzenes (as determined by Analytical Method 601 or 806). Each well within the respective zone will be deemed to have reached background when confirmed by the average of four quarterly sampling events for that well. Wells shall be determined to have reached background on a well-by-well basis. When all wells within a zone are determined to have reached background, then that zone will be determined to have reached background.

2. The following substances shall be included as analytes in the sampling program:

1,2-Dichloroethene	Chlorobenzene
1,1,1,-Trichloroethane	1,3-Dichlorobenzene
Tetrachloroethene	1,2-Dichlorobenzene
Trichloroethene	1,4-Dichlorobenzene"

L. Institutional Controls

1. Section V., Paragraph 33. Restrictions identified certain restrictions that apply to the Site. These restrictions are:

- a) No water supply wells of any kind or purpose shall be drilled or dug without prior written approval of the DEP;
- b) No dewatering, pumping, or injection into or out of the groundwater shall take place without prior written approval of the DEP;
- c) No excavation of any soil shall occur without prior written approval of the DEP;
- d) No paving, soil compacting, or placing of any impervious materials shall be allowed without prior written DEP approval.

2. Section V. Paragraphs 3B outlines the approval process, 3C. requires that 481 Corp provide notice of the restrictions to prospective assigns, purchasers, option holders, architects and general contractors of the AOC. Restrictions also have to be included in the terms of any lease. Paragraph D. allows for certain landscape activities to be performed.

III. Compliance

A. Soil

1. By the time the AOC was signed there was compliance with the on-site soil standards.
2. Merrill had performed the required source removal, and remediated the soil in an on-site land farm. The contaminants of concern reached the target cleanup levels required by the AOC (confirmed by DEP letter to Merrill dated 1/3/93). The DEP approved the relocation of the treated soil on site.
3. In a letter dated February 26, 1997, Neptune Properties, who had assumed ownership from Merrill Transport, was notified by DEP that a violation of a required restrictive covenant on the site had been documented. Specifically, written approval from the Department must be obtained prior to excavating soil, paving, compacting soil, or the placing of any impervious materials. The basis for this notice was a 100 feet long, 60 feet wide irregularly shaped pile of excavated materials (mixed construction, demo debris, and potentially contaminated soil) observed on the site.
4. A DEP approved plan was implemented that resulted in the excavated materials being used as on-site fill material or incorporated into a bermed storm water retention area at the south end of the site.
5. In a letter dated August 21, 1997, Neptune Properties is informed that the violation had been satisfactorily addressed and there are no further restrictive covenant related issues. Furthermore, Neptune Properties was reminded that "any work to be done on the site which will disturb the soils needs to meet the approval requirements of the Department."
6. A site visit (see Attachment 2) conducted by DEP on April 24, 2008 verified that the retention area and related berm were in place and were being maintained. No other areas of excavation were noted, in fact, all the areas outside of on-site buildings appeared to be covered by asphalt. The only areas where the significant soil was exposed were the south-end retention area and the enhanced flushing area (see Groundwater Section)

B. Groundwater

1. Enhanced flushing was used as the means to remediate the groundwater. Appendix 1. of the AOC described that it be accomplished by removal of the

relatively impervious cover material and percolation of natural precipitation through the soil at the specified locations. A more detailed explanation and description of the technique is provided in Appendix 1. At the time the AOC was signed on-going groundwater monitoring was required in Zone A and Zone B.

2. On July 12, 1993 a letter was sent to the Responsible Parties that acknowledges the ground water in Zone A has met the AOC requirements for groundwater. This left the groundwater in Zone B as the only remaining contaminated media.
3. Since July 1993, the groundwater monitoring plan has been modified on several occasions with knowledge and approval of the DEP.
4. Since the inception of groundwater sampling a downward trend in the concentration of contaminants of concern in the groundwater has been documented.
5. In March 2000 DEP accepted a plan that modified the sampling plan as follows: "...starting in 2001, and every three years thereafter, the department agrees that MH-2 samples will be collected after the spring flushing has occurred (in either May or June)."
6. The latest groundwater monitoring was conducted in July 2007. The results show the presence of several VOC's above the state's Maximum Exposure Guidelines (MEGs). The results also show that the level of chlorobenzenes is below the RAG of 10 ppb. Comparing the 2007 results with previous sampling results documents a downward trend (see Attachment 3).
7. A site visit conducted by DEP on April 24, 2008 verified the existence of the enhanced flushing area. The collection swale was open and free of any obstructions. Concrete structures (known as Jersey Barriers) were in place to keep traffic off the enhanced flushing area. The enhanced flushing area itself appeared maintained; it remains unobstructed with an exposed bed of crushed rock and no vegetative growth other than some grass.

C. Restrictions

1. The institutional controls identified Section II., L. above remain in effect.
2. A site visit conducted by DEP on April 24, 2008 noted no violations of the institutional controls.

IV. Conclusions

- A. Soil : The soil at the Merrill Transport Site meet the required RAGs for soil. Issues regarding the excavation of soil on-site without prior DEP approval have been resolved.
- B. Groundwater: Since 1987 Total VOC levels in MH-2 water samples has decreased from 1,100 mg/l to 97 mg/l. Through the years there has been an observable downward trend. The MH-2 water at the Merrill Transport Site meets the RAGs (10 ppb) for chlorobenzenes. It does not meet the background level of 30 ppb for total VOC's as specified in Section V., Paragraph 30.C.3
- C. Land Use Restrictions – Soil: The existing land use restrictions remain necessary to ensure that the on-site soils, the soils in the flushing area, and the retention pond area (with associated berm) remain undisturbed. .
- D. Land Use Restrictions - Groundwater: Water from MH-2 collected in June 2007 still shows the presence of VOCs. The levels have been falling for quite some time, but their

presence indicates that residual contamination remains in the on-site soil. The existing land use restrictions remain necessary to ensure the continued operation of the enhanced flushing area and to prevent alterations to the site without the review and approval of the DEP.

V. Status/Issues

A. Site Status:

1. Soil - No further active remedial action required
2. Groundwater - No further monitoring required
3. Restrictions - Prior written DEP approval is required to undertake any of the activities identified in Section II. L.

VI. Last Division of Remediation activity: Site Inspection performed April 24, 2008

VII. Federal Status/Issues

A. CERCLIS status: The Site was given a No Further Action Required and Archived by EPA in March 1998.

B. Issues: N/A

C. Referral: N/A

VIII. Summary/Determination Based on a review of file information, including the July 6, 2007 Tewhey Associates Report, and a site visit conducted by DEP on April 24, 2008 it is determined that:

A. Routine Water Monitoring: Further routine monitoring of MH-2 is not required for the following reasons:

1. The RAGs of 10 ppb for chlorobenzenes has been met and
2. 20 years of monitoring document a continuing downward trend for total VOCs. Demonstrating that the flushing zone has been effective in removing contamination from sub-surface soils.

B. Enhanced Flushing: Maintenance of the existing groundwater flushing operation is necessary to continue the effective removal of residual contamination in on-site subsurface soil.

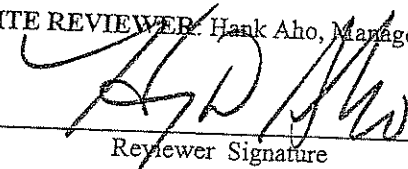
C. Institutional Controls: Institutional Controls are required and will remain in effect for the following reasons:

1. Contaminated soils remain on-site under the asphalt covered areas and in the retention pond area,
2. the on-site groundwater remains contaminated above the RAG for total VOCs., and
3. the enhance flushing system is still operational and cannot be disturbed.

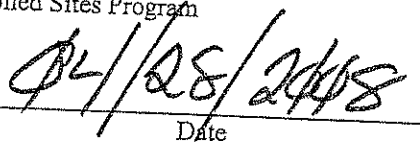
D. Termination of Site Activities and Institutional Controls

1. The process for termination of site related activities is described in Section IV., 52. of the AOC.

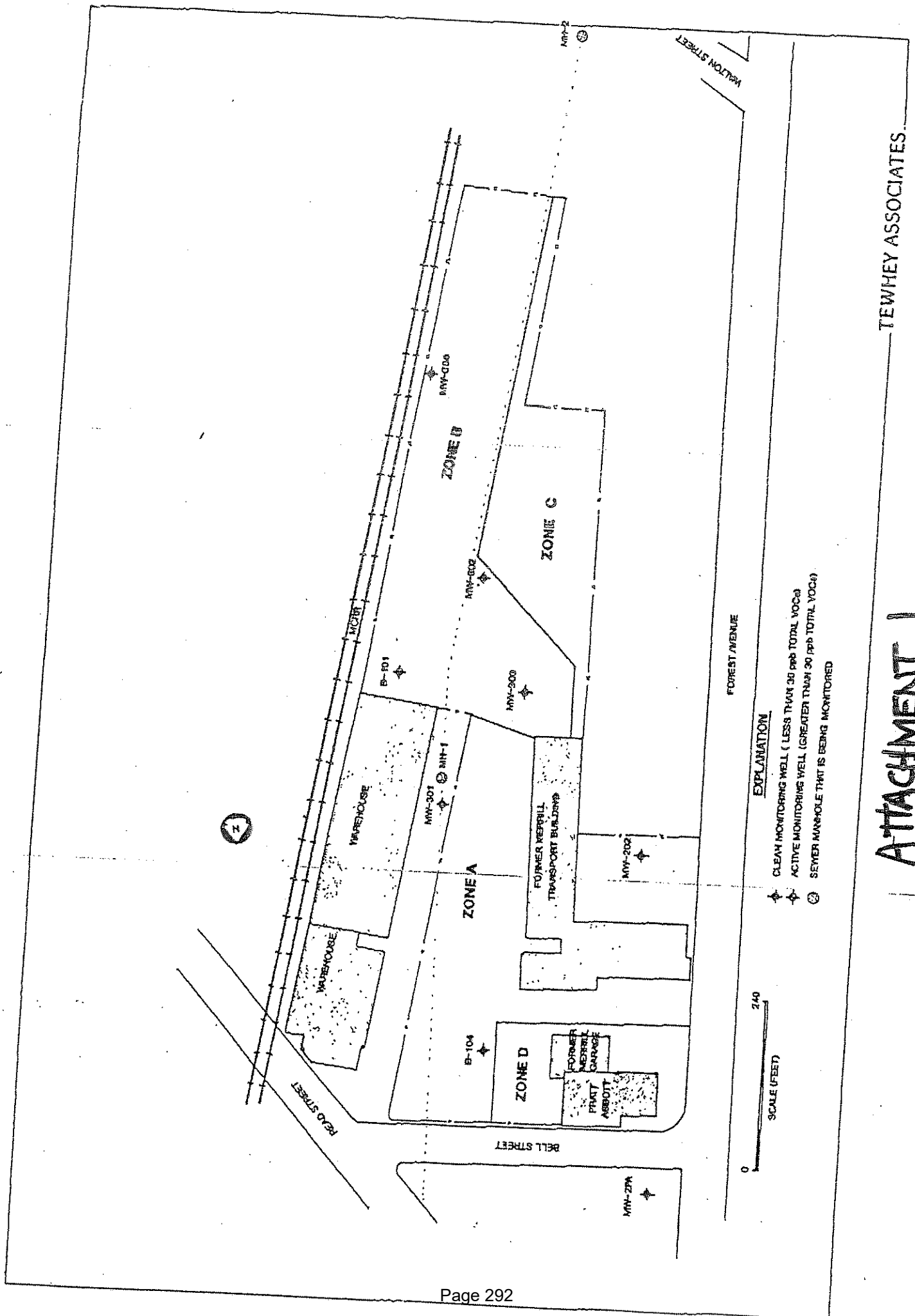
IX. SITE REVIEWER: Hank Aho, Manager, Uncontrolled Sites Program



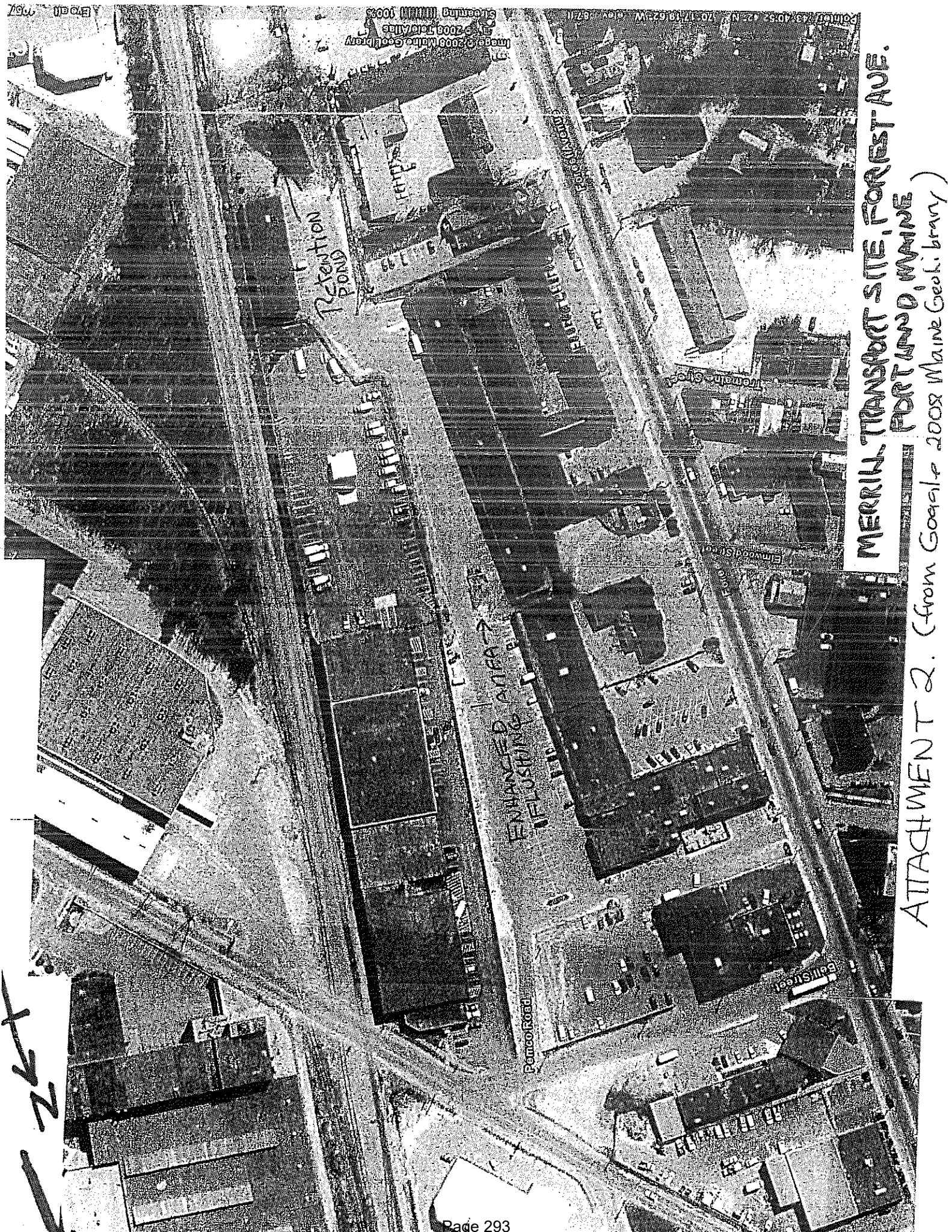
Reviewer Signature



Date



ATTACHMENT I



1997

Images © 2008 Maine Geology
Image # 2008 Fortland
Scanning (11/11/11) 100%

Point: 4374952.42 N 7051718.02 W Elev: 87.11

261

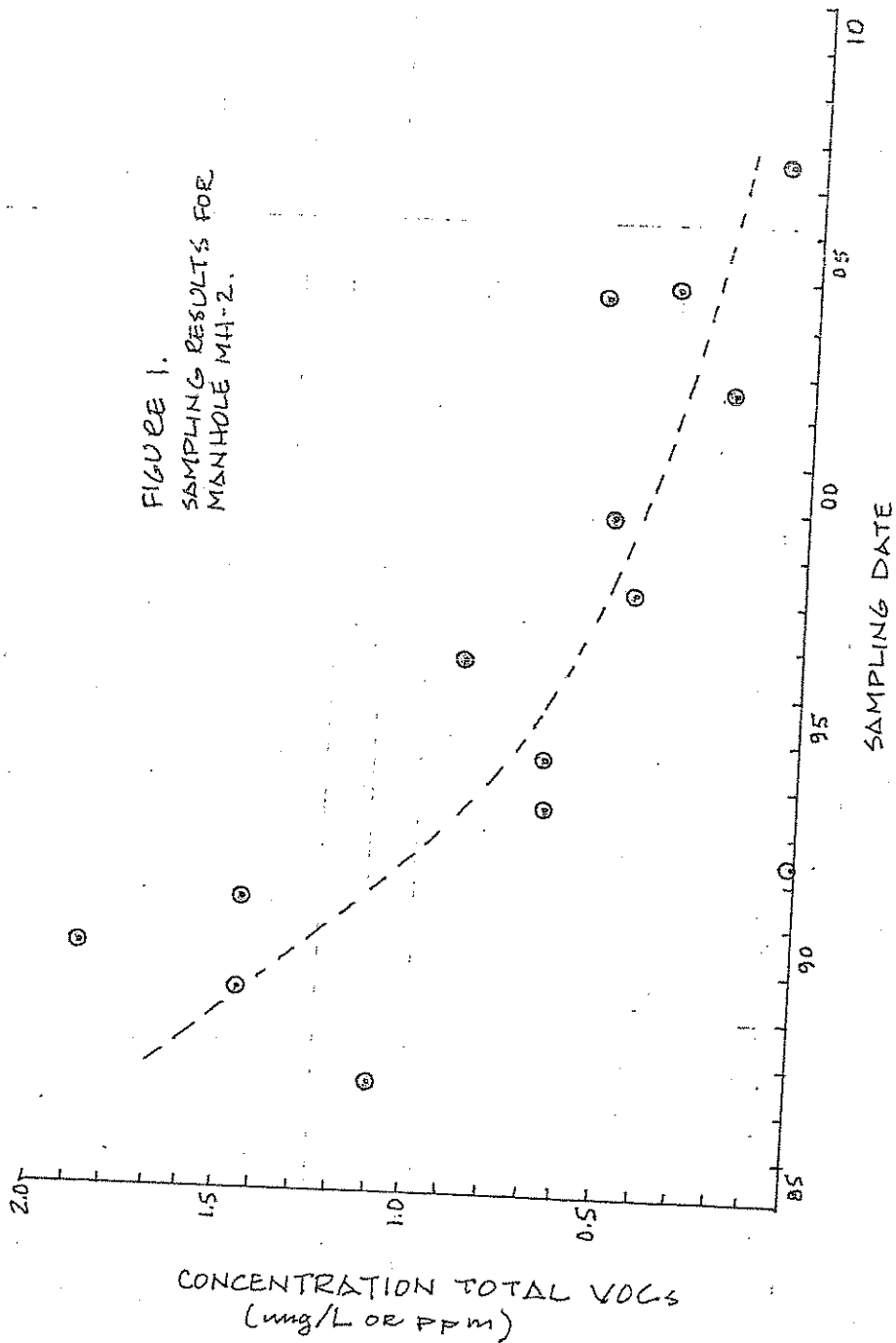
Retention Pond

ENHANCED AREA
FLUSHING AREA

MERRILL TRANSPORT SITE, FOREST AVE.
FORTLAND, MAINE

ATTACHMENT 2. (from Google 2008 Maine Geology)

FIGURE 1.
SAMPLING RESULTS FOR
MANHOLE MH-2.



ATTACHMENT 3.

NO FURTHER ACTION (NFA) DECISION DOCUMENT

Division of Remediation (DOR)
Bureau of Remediation and Waste Management

SITE: Merrill Transport

Location: Forest Ave. or 250 Read St., Portland, Maine

For Uncontrolled Hazardous Substances Sites listing purposes only. Check the one that Applies:

- No Further Action but remains on Remediation List of Sites.
- No Further Action but remains on Remediation List of Sites and has Land Use Control (LUC) or other maintenance/reporting requirement.
- No Further Action – DELISTED (removed from Division of Remediation Sites List)

I. PURPOSE

Based on current site information, the DOR has determined that further investigation and active remediation of this site is not warranted. A passive groundwater flushing system is in place and shall remain until a decision to terminate operations is made per the February 1992 Administrative Order by Consent (AOC) made between Merrill Industries, Four-Eighty-Corp, and the State of Maine. The purpose of this status report is to provide the rationale and documentation for a no further action (NFA) other than compliance with on-going LUCs designation for Merrill Transport Site, Forest Avenue or 250 Read Street, Portland.

II. PERTINENT SITE INFORMATION

- A. Discovery: In December 1985, the Liberty Group (a real estate development group) arranged for Robert G. Gerber, Inc., of Freeport, Maine, to conduct an environmental audit of the Site. Later, Merrill Transport (Merrill) arranged for Geotechnical Engineers, Inc. (GEI), of Winchester, MA to perform similar environmental assessment. The results of these investigations revealed the presence of volatile organic compounds (VOCs) in the soil and groundwater. The highest concentrations of hazardous substances in soil and groundwater occurred at the location of the unlined holding pit, which had been filled in prior to these investigations. This discovery was brought to the attention of the DEP.
- B. Source(s) of potential hazardous substance release: An unlined holding pit.
- C. Pathway of hazardous substance migration: Hazardous substances released into the pits leached out contaminating adjacent soils and groundwater.
- D. Impacted resources: On-site soil and groundwater. The groundwater also discharged by seepage to a City of Portland sewer that runs through the Site.
- E. Remedial activities: The on December 29, 1986 and January 6, 1987 Merrill arranged for the removal and proper disposal (off-site) of the soil in the immediate vicinity of the unlined holding pit containing the highest concentrations (>100 mg/kg) of total organic compounds. Approximately 120 cubic yards of contaminated soil was removed.
- F. Additional remedial activities that were developed and implemented included:
1. Excavation of certain areas with on-site land-farming;
 2. Implementation of enhanced flushing to accelerate the rate of percolation of natural precipitation through on-site soils; and,
 3. Groundwater monitoring.

G. AOC – These activities were memorialized and agreed to in an administrative order by consent (AOC) signed February 11, 1992 by P.D. Merrill (for Merrill Industries, Inc) and Henry Bouchard (481 Corp.).

H. Remedial Activities & RAGs - Section V of the AOC identifies the specific necessary actions and remedial action goals (RAGs). The details of the comprehensive remedial action can be found in the documents identified in Paragraph 24 of the AOC.

I. RAGs - For the purpose of this decision documents, the remedial action goals (Section V, Paragraph 31 of the AOC) are described as follows (see Attachment 1):

1. "After either and both of (1) completion of the soil remediation activities as described in the work plans for Zone B, the holding pit, and the CB location, identified in Paragraph 30 (A) and (2) the receipt of data indicating that the down gradient groundwater monitoring wells in either Zone A or Zone B, have reached background as defined in this Agreement under Paragraph 30[see below], any Respondent may inform DEP of such in writing. The DEP shall then assess the activities or data. If the DEP finds that the soil remediation activities have been performed in accord with the approved plans or the groundwater monitoring data indicate that background has been achieved in either Zone A or Zone B, the DEP shall issue a certificate of completion for that portion of the remedial work. Respondents shall provide test results indicating that a certificate of completion shall be issued, and DEP shall respond in writing within 30 days by issuing or denying a certificate of completion in writing providing DEP's reasons for such a denial.

2. Zones C and D are not subject to further remedial action under this Agreement and therefore remediation activities are certified complete for these zones.

J. Paragraph 30.C.1. Ground Water Monitoring states:

1. "The target cleanup level established by the DEP for this site for groundwater is the higher of either drinking water maximum exposure guideline, as adopted in the letter from Dr. Robert Frakes, [Maine] Department of Human Services dated May 30, 1990 or the background level of groundwater entering the site) described in Paragraph 30.C.3. below) based on previous sampling at a number of monitoring wells."

K. Paragraph 30.C.3. reads:

1. "For groundwater, background is 30 ppb total VOC's or 10 ppb chlorobenzenes (as determined by Analytical Method 601 or 806). Each well within the respective zone will be deemed to have reached background when confirmed by the average of four quarterly sampling events for that well. Wells shall be determined to have reached background on a well-by-well basis. When all wells within a zone are determined to have reached background, then that zone will be determined to have reached background.

2. The following substances shall be included as analytes in the sampling program:

1,2-Dichloroethene	Chlorobenzene
1,1,1,-Trichloroethane	1,3-Dichlorobenzene
Tetrachloroethene	1,2-Dichlorobenzene
Trichloroethene	1,4-Dichlorobenzene"

L. Institutional Controls

1. Section V., Paragraph 33. Restrictions identified certain restrictions that apply to the Site. These restrictions are:

- a) No water supply wells of any kind or purpose shall be drilled or dug without prior written approval of the DEP;
- b) No dewatering, pumping, or injection into or out of the groundwater shall take place without prior written approval of the DEP;
- c) No excavation of any soil shall occur without prior written approval of the DEP;
- d) No paving, soil compacting, or placing of any impervious materials shall be allowed without prior written DEP approval.

2. Section V. Paragraphs 3B outlines the approval process, 3C. requires that 481 Corp provide notice of the restrictions to prospective assigns, purchasers, option holders, architects and general contractors of the AOC. Restrictions also have to be included in the terms of any lease. Paragraph D. allows for certain landscape activities to be performed.

III. Compliance

A. Soil

1. By the time the AOC was signed there was compliance with the on-site soil standards.
2. Merrill had performed the required source removal, and remediated the soil in an on-site land farm. The contaminants of concern reached the target cleanup levels required by the AOC (confirmed by DEP letter to Merrill dated 1/3/93). The DEP approved the relocation of the treated soil on site.
3. In a letter dated February 26, 1997, Neptune Properties, who had assumed ownership from Merrill Transport, was notified by DEP that a violation of a required restrictive covenant on the site had been documented. Specifically, written approval from the Department must be obtained prior to excavating soil, paving, compacting soil, or the placing of any impervious materials. The basis for this notice was a 100 feet long, 60 feet wide irregularly shaped pile of excavated materials (mixed construction, demo debris, and potentially contaminated soil) observed on the site.
4. A DEP approved plan was implemented that resulted in the excavated materials being used as on-site fill material or incorporated into a bermed storm water retention area at the south end of the site.
5. In a letter dated August 21, 1997, Neptune Properties is informed that the violation had been satisfactorily addressed and there are no further restrictive covenant related issues. Furthermore, Neptune Properties was reminded that "any work to be done on the site which will disturb the soils needs to meet the approval requirements of the Department."
6. A site visit (see Attachment 2) conducted by DEP on April 24, 2008 verified that the retention area and related berm were in place and were being maintained. No other areas of excavation were noted, in fact, all the areas outside of on-site buildings appeared to be covered by asphalt. The only areas where the significant soil was exposed were the south-end retention area and the enhanced flushing area (see Groundwater Section)

B. Groundwater

1. Enhanced flushing was used as the means to remediate the groundwater. Appendix 1. of the AOC described that it be accomplished by removal of the

relatively impervious cover material and percolation of natural precipitation through the soil at the specified locations. A more detailed explanation and description of the technique is provided in Appendix 1. At the time the AOC was signed on-going groundwater monitoring was required in Zone A and Zone B.

2. On July 12, 1993 a letter was sent to the Responsible Parties that acknowledges the ground water in Zone A has met the AOC requirements for groundwater. This left the groundwater in Zone B as the only remaining contaminated media.
3. Since July 1993, the groundwater monitoring plan has been modified on several occasions with knowledge and approval of the DEP.
4. Since the inception of groundwater sampling a downward trend in the concentration of contaminants of concern in the groundwater has been documented.
5. In March 2000 DEP accepted a plan that modified the sampling plan as follows: "...starting in 2001, and every three years thereafter, the department agrees that MH-2 samples will be collected after the spring flushing has occurred (in either May or June)."
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C. Restrictions

1. The institutional controls identified Section II., L. above remain in effect.
2. A site visit conducted by DEP on April 24, 2008 noted no violations of the institutional controls.

IV. Conclusions

- A. Soil: The soil at the Merrill Transport Site meet the required RAGs for soil. Issues regarding the excavation of soil on-site without prior DEP approval have been resolved.
- B. Groundwater: Since 1987 Total VOC levels in MH-2 water samples has decreased from 1,100 mg/l to 97 mg/l. Through the years there has been an observable downward trend. The MH-2 water at the Merrill Transport Site meets the RAGs (10 ppb) for chlorobenzenes. It does not meet the background level of 30 ppb for total VOC's as specified in Section V., Paragraph 30.C.3
- C. Land Use Restrictions – Soil: The existing land use restrictions remain necessary to ensure that the on-site soils, the soils in the flushing area, and the retention pond area (with associated berm) remain undisturbed. .
- D. Land Use Restrictions - Groundwater: Water from MH-2 collected in June 2007 still shows the presence of VOCs. The levels have been falling for quite some time, but their

presence indicates that residual contamination remains in the on-site soil. The existing land use restrictions remain necessary to ensure the continued operation of the enhanced flushing area and to prevent alterations to the site without the review and approval of the DEP.

V. Status/Issues

A. Site Status:

1. Soil - No further active remedial action required
2. Groundwater - No further monitoring required
3. Restrictions - Prior written DEP approval is required to undertake any of the activities identified in Section II. L.

VI. Last Division of Remediation activity: Site Inspection performed April 24, 2008

VII. Federal Status/Issues

A. CERCLIS status: The Site was given a No Further Action Required and Archived by EPA in March 1998.

B. Issues: N/A

C. Referral: N/A

VIII. Summary/Determination Based on a review of file information, including the July 6, 2007 Tewhey Associates Report, and a site visit conducted by DEP on April 24, 2008 it is determined that:

A. Routine Water Monitoring: Further routine monitoring of MH-2 is not required for the following reasons:

1. The RAGs of 10 ppb for chlorobenzenes has been met and
2. 20 years of monitoring document a continuing downward trend for total VOCs. Demonstrating that the flushing zone has been effective in removing contamination from sub-surface soils.

B. Enhanced Flushing: Maintenance of the existing groundwater flushing operation is necessary to continue the effective removal of residual contamination in on-site subsurface soil.

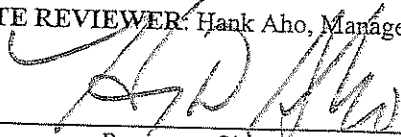
C. Institutional Controls: Institutional Controls are required and will remain in effect for the following reasons:

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2. the on-site groundwater remains contaminated above the RAG for total VOCs., and
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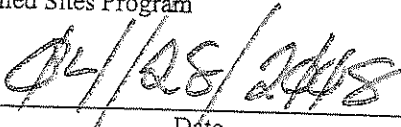
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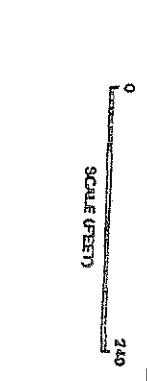
IX. SITE REVIEWER: Hank Aho, Manager, Uncontrolled Sites Program



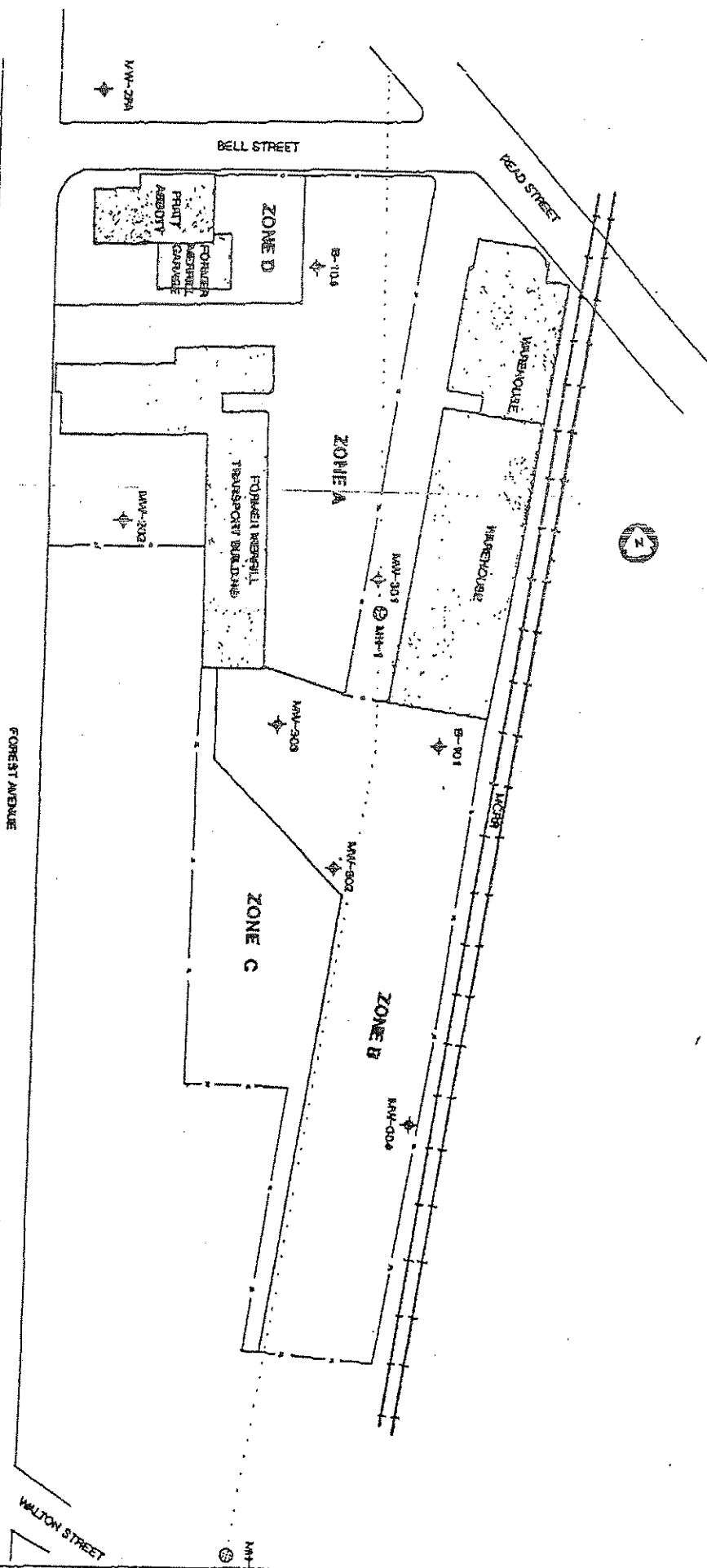
Reviewer Signature



Date



- EXPLANATION**
- ◆ CLEAN MONITORING WELL (LESS THAN 30 PPD TOTAL VOCs)
 - ◆ ACTIVE MONITORING WELL (GREATER THAN 30 PPD TOTAL VOCs)
 - ⊗ SEWER MANHOLE THAT IS BEING MONITORED



ATTACHMENT 1

TEWHEY ASSOCIATES



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 4, 2008

MC Portland, LLC
Mr. Paul Cincotta, Vice President
c/o Packard Development
One Wells Avenue
Newton, MA 02459

RE: Parcel A1/A1C, Morrills Crossing, Allen Ave, Portland Maine
Voluntary Response Action Program No Action Assurance Letter

Dear Mr. Cincotta:

The Maine Department of Environmental Protection's ("Department's") Voluntary Response Action Program ("VRAP") has received MC Portland, LLC ("MC Portland") application for Parcel A1/A1C located on Allen Avenue/ Morrill's Crossing in Portland, Maine ("Parcel A1/A1C"). The application was submitted with the request that the Site participate in the VRAP, and that MC Portland LLC, as an applicant to the VRAP, receive the protections provided by the VRAP law. Submitted to the Department as part of the VRAP application was a Site Investigation Report, prepared by St. Germain & Associates, Inc. ("St. Germain"). This report outlines the history of the Site and environmental conditions of Parcel A1/A1C. Also included in the VRAP submittal was a cover letter which outlined proposed remedial actions for the property that are to occur prior to and during the redevelopment of Parcel A1/A1C.

Based on the information presented in the Report, the Department concurs with the remedial actions and procedures as outlined in the cover letter to the VRAP Application. Soil borings advanced into the Site identified two areas of petroleum impacts to the soil. Parcel 1A/A1C exhibits characteristics which would qualify it as a "Baseline-2" level petroleum remediation, as enumerated in the Department's "Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Ground Water in Maine". A Baseline-2 remediation requires the removal of free-product petroleum in groundwater and the removal/remediation of petroleum saturated soils, as well as the removal/ remediation of petroleum contaminated soils with greater than 500-1000 parts per million ("ppm") of gasoline range organics ("GRO") and/or greater than 200-400 ppm of diesel range organics ("DRO"), as measured using the Department's field headspace method. As the petroleum impacts are from fuel oil, a target clean up goal of

AUGUSTA 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017 (207) 287-7688 FAX: (207) 287-7826 RAY BLDG., HOSPITAL ST.	BANGOR 106 HOGAN ROAD BANGOR, MAINE 04401 (207) 941-4570 FAX: (207) 941-4584	PORTLAND 312 CANCO ROAD PORTLAND, MAINE 04103 (207) 822-6300 FAX: (207) 822-6303	PRESQUE ISLE 1235 CENTRAL DRIVE, SKYWAY PARK PRESQUE ISLE, MAINE 04769-2094 (207) 764-0477 FAX: (207) 760-3143
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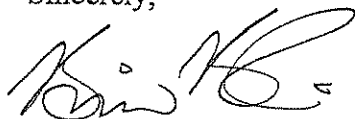
400 ppm is appropriate for the known petroleum impacted soils. Exceptions will include areas where removal of impacted soil could threaten the structural integrity of buildings, or damage utility lines that are currently in use. VRAP staff will be contacted if utility lines are encountered to determine the need to remove contaminated soil in these circumstances. Additionally, if contamination extends below the groundwater table, the VRAP staff will be contacted to determine the need to remove contaminated soil below the groundwater table.

Provided that the remedial actions are completed to the satisfaction of the Department, MC Portland LLC, and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at Allen Avenue, identified as Lots 10, 11, 12, 21, 22, and 26, Block G, on Portland Tax Map 435, Lots 1, 2, 3, 28, 29, 30, Block D, on Portland Tax Map 435, and Lot 2, Block C, on Tax Map 152, as listed in Book 24539 on Page 267 and 269, and Book 14721 Page 207 of the Cumberland County Registry of Deeds. The Department will take no action against MC Portland LLC and those persons identified in 38 M.R.S.A. §343-E(6).

Once the remedial measures to be implemented are completed, a report demonstrating the successful implementation of the tasks will be forwarded to the VRAP, as described in the Cover Letter. Upon determining successful conclusion of the remedial tasks, the Department will issue to MC Portland, LLC a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please call me at 207-287-4858.

Sincerely,



Brian Beneski, VRAP Project Manager
Division of Remediation
Bureau of Remediation and Waste Management

CC: Keith Taylor, St. Germain & Associates Inc.
Natalie L. Burns, ESQ, Jensen Baird Gardner & Henry
Nick Hodgkins, MEDEP
Bill Bullard, MEDEP

FILE



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 4, 2008

MC Portland, LLC
Mr. Paul Cincotta, Vice President
c/o Packard Development
One Wells Avenue
Newton, MA 02459

RE: Parcel A2-BF/A2-RU, Morrills Crossing, Allen Avenue, Portland Maine
Voluntary Response Action Program No Action Assurance Letter

Dear Mr. Cincotta:

The Maine Department of Environmental Protection's ("Department's") Voluntary Response Action Program ("VRAP") has received MC Portland, LLC ("MC Portland") application for Parcel A2-BF/A2-RU, Morrills Crossing, located on Allen Avenue in Portland, Maine ("Parcel A2"). The application was submitted with the request that the Site participate in the VRAP, and that MC Portland LLC, as an applicant to the VRAP, receive the protections provided by the VRAP law. Submitted to the Department as part of the VRAP application was a Site Investigation Report, prepared by St. Germain & Associates, Inc. ("St. Germain"). This report outlines the history of the Site and environmental conditions of Parcel A2-BF/A2-RU. Also included in the VRAP submittal was a cover letter which outlined proposed remedial actions for the property that are to occur prior to and during the redevelopment of Parcel A2-BF/A2-RU.

Based on the information presented in the Report, the Department concurs with the proposed remedial actions and procedures as outlined in the cover letter to the VRAP Application. As stated in the Site Investigation Report, the Site's previous uses as a metal fabrication facility, lumber company, and service garage are considered high risk land use for potential environmental impact. Historic environmental site assessments have identified low level petroleum impacts to on Site groundwater. To further assess the actual impact of historic land use to Parcel A2-BF/A2-RU, several phases of test borings have been conducted by St. Germain. Several isolated areas of elevated lead and arsenic in soil exceeding Department Remedial Action Guidelines ("RAGs") for Adult Worker/Trespasser standards were identified. No petroleum impacted soil above the appropriate remedial standard was identified.

AUGUSTA 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017 207) 287-7688 FAX: (207) 287-7826 RAY BLDG., HOSPITAL ST.	BANGOR 106 HOGAN ROAD BANGOR, MAINE 04401 (207) 941-4570 FAX: (207) 941-4584	PORTLAND 312 CANCO ROAD PORTLAND, MAINE 04103 (207) 822-6300 FAX: (207) 822-6303	PRESQUE ISLE 1235 CENTRAL DRIVE, SKYWAY PARK PRESQUE ISLE, MAINE 04769-2094 (207) 764-0477 FAX: (207) 760-3143
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web site: www.maine.gov/dep

Parcel A2-BF/A2-RU exhibits characteristics which would qualify it as a "Baseline-2" level petroleum remediation, as enumerated in the Department's "Procedural Guidelines for Establishing Standards for the Remediation of Oil Contaminated Soil and Ground Water in Maine". A Baseline-2 remediation requires the removal of free-product petroleum in groundwater and the removal/remediation of petroleum saturated soils, as well as the removal/ remediation of petroleum contaminated soils with greater than 500-1000 parts per million ("ppm") of gasoline range organics ("GRO") and/or greater than 200-400 ppm of diesel range organics ("DRO"), as measured using the Department's field headspace method. A target clean up goal of 400 ppm is appropriate for any encountered petroleum impacted soils. Exceptions will include areas where removal of impacted soil could threaten the structural integrity of buildings, or damage utility lines that are currently in use. VRAP staff will be contacted if utility lines are encountered to determine the need to remove contaminated soil in these circumstances. Additionally, if contamination extends below the groundwater table, the VRAP staff will be contacted to determine the need to remove contaminated soil below the groundwater table.

The Cover Letter with the VRAP application outlines the conceptual plan for addressing environmental contamination at Parcel A2. A more complete remediation plan will be submitted to VRAP for approval at least two weeks prior to initiation of redevelopment activities. As outlined in the Cover Letter, soil impacted with elevated lead and arsenic will remain on-Site but will be isolated using engineering and institutional controls. Post – regrading of surfaces with soil exceeding the Adult Worker/Trespasser RAG for lead and arsenic will be covered with 12 inches of vegetated fill, building foundations, or asphalt pavement upon completion of redevelopment. Upon completion and approval of site redevelopment activities, an Environmental Covenant with appropriate activity and use limitations will be recorded, and will include prohibitions on groundwater extraction. It is possible that contaminated soil or other waste material may be encountered that is not currently known about. If such material is encountered, VRAP will be notified as outlined in the Cover Letter.

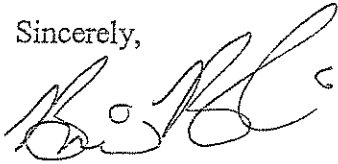
A VRAP application for Parcel B, located immediately to the west, has also been submitted to the Department. It is possible that the redevelopment of Parcel A2-BF/A2-RU will result in excess impacted soil that cannot be isolated on-site. Therefore, an additional remediation option will be to isolate this excess soil on Parcel B. The same isolation and institutional control requirements described above would also apply to the soil relocated on Parcel B.

Provided that the remedial actions are completed to the satisfaction of the Department, MC Portland LLC, and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at Allen Avenue, identified as Lot 12, Block A, on Portland Tax Map 150A, and Lot 25, Block A, on Portland Tax Map 151A, as listed in Book 14593 on Page 52 of the Cumberland County Registry of Deeds. The Department will take no action against MC Portland LLC and those persons identified in 38 M.R.S.A. §343-E(6).

All remedial measures completed at Parcel A2-BF/A2-RU will be documented in a Site Remediation Report and forwarded to the VRAP, as described in the Cover Letter. Upon determining successful conclusion of the remedial tasks, the Department will issue to MC Portland LLC a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please call me at 207-287-4858.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Beneski', written in a cursive style.

Brian Beneski, VRAP Project Manager
Division of Remediation
Bureau of Remediation and Waste Management

CC: Keith Taylor, St. Germain & Associates Inc.
Natalie L. Burns, ESQ, Jensen Baird Gardner & Henry
Nick Hodgkins, MEDEP
Bill Bullard, MEDEP



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FILE COPY

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

April 4, 2008

MC Portland, LLC
Attn: Paul Cincotta, Vice President
c/o Packard Development
One Wells Avenue
Newton, MA 02459

Re: Parcel D, Morrills Crossing, Portland Maine-
Voluntary Response Action Program ("VRAP") No Further Action Assurance
Letter

Dear Mr. Cincotta:

The Maine Department of Environmental Protection (hereinafter the "Department") has received and reviewed the Voluntary Remedial Action Program ("VRAP") application for the Parcel D, Morrills Crossing ("Parcel D") located on Princeton Street, Portland Maine. The application was submitted with the request that MC Portland LLC ("MC"), as an applicant to the VRAP, receive the protections from Department enforcement actions as provided by the VRAP law. Included with the application was a Phase I Environmental Site Assessment Report ("Phase I Report"), completed by St. Germain & Associates, Inc. ("St. Germain").

Based on the information presented in the report, the Department considers no further investigation or remedial actions necessary at Parcel D at this time. Parcel D is part of a larger coordinated development project occurring at Morrills Corner. The entire Morrill's Corner project is approximately 20 acres in size, and Parcel D is a parcel of land located on the Northern portion of the project, and is approximately 1.66 acres in size. Parcel D is the combination of many adjacent undeveloped and residential parcels; these parcels are currently identified as Lots 4 - 27, Tax Block D, on City of Portland Tax Map 435. According to information presented in the Phase I Report, two of these lots were developed as residential dwellings in the 1940s, their use has remained as residential since that time. The remaining lots are undeveloped with shrub and wood growth. The Portland Water district provides water and sewer to the surrounding area, including the currently existing residential dwellings.

As outlined in the Phase I report, no recognized environmental conditions ("RECs") were identified during research into the historic use of, or during the reconnaissance of, the lots that make up Parcel D. Environmental records review also did not identify any RECs associated with the lots that make up Parcel D. As part of the planning for future development of Parcel D, ten geotechnical test borings were advanced to refusal in 2006 by R.W. Gillespie & Associates, Inc. throughout Parcel D. Soil samples from each boring were collected and screened in the field utilizing the Department's field headspace method. No samples from the soil borings advanced in Parcel D exhibited elevated vapors. No visual observations suggestive of environmental impacts were observed.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

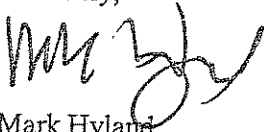
This no further action decision applies only to environmental conditions discovered and reported in the assessment reports submitted by St. Germain to the VRAP.

Therefore, MC Portland LLC, as applicant to the VRAP, is granted the liability protections provided pursuant to Title 38 MRSA § 343-E. The Department will take no actions against MC Portland LLC, and/or those persons identified in 38 MRSA § 343-E(6), provided that a copy of this letter for the property identified as Lots 4 - 27, Tax Block D, on City of Portland Tax Map 435 and further described in Book 14721, Page 207, and Book 23018, Page 104 of the Cumberland County Registry of Deeds, is recorded with the Cumberland County Registry of Deeds. A copy of the recorded document shall be provided to the Department's VRAP.

It should be understood that the VRAP liability protections under 38 M.R.S.A. § 343-E are limited to investigation and cleanup liability as provided in that law and to the environmental conditions addressed by the environmental reports submitted to the VRAP program, and issued based on the conditions established in 38 MRSA § 343-E. VRAP liability protections under 38 M.R.S.A. § 343-E do not limit the DEP's enforcement authorities for non-compliance with other laws administered by the Department.

If you have any questions regarding the contents of this letter, please feel free to contact Brian Beneski of my staff at 207-287-4858.

Sincerely,



Mark Hyland
Director
Bureau of Remediation & Waste Management

CC: Brian Beneski, Maine DEP
Keith Taylor, St. Germain & Associates Inc.
Natalie L. Burns, ESQ, Jensen Baird Gardner & Henry

STATE OF MAINE
KENNEBEC, ss.,

April 8th, 2008

Then personally appeared the above-named Mark Hyland, Director, Bureau of Remediation & Waste Management of the Maine Department of Environmental Protection and duly authorized delegee for the Commissioner, and acknowledged the foregoing instrument to be his free act and deed, and the free act and deed of the Department of Environmental Protection.

Before me,


Notary Public

Laura L. Gay
(Print name)



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAWN R. GALLAGHER
COMMISSIONER

August 11, 2005

FILE COPY

Mr. Josh Praver
Northern Sky Development Corp.
29 Lunt Road
Freeport, Maine 04032

Re: 68-70 Bishop Street Properties, Portland, Maine

Mr. Praver:

Per our phone discussions, I am writing to clarify the Maine Department of Environmental Protection's position with respect to the Voluntary Response Action Program ("VRAP") certification (see enclosed documents) of the Former Holden Company property, which includes the properties at 68-70 Bishop Street.

During the initial investigations of the property, limited sampling indicated the presence of low levels of metals and petroleum in the soils/sediments of a drainage outfall. Additional sampling was performed in this area to further characterize the contamination. Although contamination was found during the additional sampling, the levels are quite typical of an urban setting and do not represent a significant threat to the public health or the environment. Therefore, the Department did not and is not requiring any additional investigation or remediation of these soils/sediments unless 1) the property use changes to include residential uses, and/or 2) excavation of this drainage outfall area is required for any purpose.

If excavation is required in the drainage outfall area, appropriate precautions would need to be taken to handle and dispose of the site, as it is not suitable to be used as "clean fill".

If property use (in the future) remains consistent with the current use and no excavation is planned for the drainage outfall area, nothing needs to be done. The protections and assurances as provided by the VRAP extend to the current and future property owners, provided they adhere to the two conditions discussed above.

If you have any questions regarding this letter, please feel free to call me at 207-287-4854.

Sincerely,

Nicholas J. Hodgkins
Voluntary Response Action Program
Division of Remediation

AUGUSTA
7 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
LAW BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

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312 CANCO ROAD
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(207) 764-0477 FAX: (207) 764-1507



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

GOVERNOR

DAVID P. LITTELL

COMMISSIONER

June 15, 2009

Mr. Vincent Veroneau
J. B. Brown & Sons
P O Box 207
Portland, ME 04112-0207

Re: Hazardous Waste Generator Closure Certification
American Can Co. (former) 40 Quarry Road, Portland - EPA ID# MED 083177840

Dear Mr. Veroneau:

This letter is to acknowledge the closure certification document for the generator closure of the above referenced facility. The documents considered in this closure are as follow:

Letter/Report: from Drumlin Environmental, LLC
RE: Hazardous Waste Closure Notification
Former American Can Company - MED 083177840, Portland, Maine
Dated: April 7, 2009

Letter: From Drumlin Environmental, LLC
RE: American Can Company Closure (MED 083177840)
Dated: May 12, 2009
(With Closure Certification)

These documents meet the certification requirements of Chapter 851, Section 11 of the Maine Hazardous Waste Management Rules. Please be advised that the EPA identification number for this facility, MED 083177840, will be deactivated to reflect the closure. This number shall not be used again until it has been reactivated through subsequent notification to the Department and the USEPA. Nothing in this letter shall relieve the operator, American Can Company, of any responsibility or liability relating to the presence of or discharge of hazardous wastes at the above location. If there are any questions concerning this closure acknowledgment please call me at 207-287-2651.

Sincerely,

Edward J. Vigneault
Division of Oil & Hazardous Waste Facilities Regulation
Bureau of Remediation and Waste Management

Pc: Rich Fortin, Drumlin Environmental, LLC

American can Portland closure.doc

AUGUSTA 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0917 (207) 267-7688 FAX: (207) 267-7826 RAY BLDG., HOSPITAL ST.	BANGOR 106 HOGAN ROAD BANGOR, MAINE 04401 (207) 941-4570 FAX: (207) 941-4584	PORTLAND 312 CANCO ROAD PORTLAND, MAINE 04103 (207) 822-6300 FAX: (207) 822-6303	PRESQUE ISLE 1235 CENTRAL DRIVE, SKYWAY PARK PRESQUE ISLE, MAINE 04769-2094 (207) 764-0477 FAX: (207) 760-3143
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December 11, 2015
15426

Mr. Nicholas J. Hodgkins
Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
Division of Remediation
17 State House Station
Augusta, ME 04333-0017

Voluntary Response Action Program
Former Burt Company Site and Adjacent Property, Cambridge & Cornell Streets, Portland, Maine

Dear Mr. Hodgkins:

Enclosed please find a completed copy of the Application for Assistance within the Maine Department of Environmental Protection (Maine DEP) Voluntary Response Action Program (VRAP) for two contiguous properties on Cambridge and Cornell Streets in Portland. Sebago Technics, Inc. (STI) is acting as environmental consultant on behalf of the City of Portland (the "Applicant") for these properties. These two properties (the "Property") are identified on the City of Portland Tax Map 151A, Block A, Lots 13 & 21. Lot 13 is the former location of the Burt Company, located at 1 Cambridge Street, with Lot 21 consisting of a vacant property, with a listed address of 21 Cornell Street within the City of Portland.

The sites are currently vacant, with the exception of stream culverts and embankment stabilization materials. Remaining portions of the property contain a mix of recently cut brush and trees, and previously undeveloped wooded and wetland areas.

Background

The former Burt Company property was listed with the US Environmental Protection Agency (EPA) as a State Hazardous Waste Site (SHWS) and is listed as a Federal Brownfields site. The Burt Company site was the subject of environmental investigations beginning in the early 1990's and most recently in 2008 as part of a previous VRAP application in conjunction with potential redevelopment of the 1 Cambridge Street site. VRAP approved redevelopment plans at the time of the 2008 application included a detention pond and athletic field proposed for this site. These redevelopment plans were approved provided contaminated soils were placed under cover systems, or removed from the site altogether. STI recently contacted the current Maine DEP site representative Brian Beneski concerning the current status of the site, whom confirmed the site had been characterized in 2007 & 2008 by St. Germain & Associates, however no remediation has been completed due to the project redevelopment plans stalled at that time.

The second property, Lot 21, located immediately adjacent to the northeast of the former Burt Company site, remains vacant and undeveloped. Much of this property consists of undeveloped wetlands and isolated upland pockets.

Previous site characterization conducted within St Germain & Associate's *Site Investigation Report Parcel CP Morrill's Crossing Project, Allen Avenue, Portland, Maine, January 25, 2008* indicates both arsenic and lead contamination exists on the former Burt Company portion of the property, with lead

contaminated soils remaining on a southern portion of the Cornell Street property. This contamination, as reported in the 2008 Report, is above applicable Remedial Action Guidelines (RAGs) for the property. While conducting the 2008 Phase II investigation, ST Germain & Associates collected surface samples which extended onto the adjacent Cornell Street property, which indicate concentrations of lead in soils, also over applicable RAGs. These documented exceedances were identified as recognized environmental conditions in the Phase I ESAs for each of these properties, and as a result, are proposed to be mitigated in conjunction with the property's application to VRAP.

Proposed Site Redevelopment Plans

The City of Portland, current owner of the former Burt Company portion of the property is currently proposing a land swap with J.B. Brown & Sons for the adjacent Cornell Street property. These properties will be swapped and subdivided, resulting in the City of Portland obtaining the Cornell Street property and retaining the lead contaminated portions of the former Burt Company parcel. Following the land swap, J.B. Brown intends to lease the Cambridge street property for commercial uses, primarily for the storage of landscaping materials and waste (clippings/wood waste/mulch, etc.). The City of Portland has no current redevelopment plans for the Cornell Street portion of the property. No structures are currently proposed for either parcel included in this property.

Proposed Remedial Action Plan

In general, the Remedial Action Plan includes the isolation of previously identified areas of contamination on the property. Soils impacted with lead and arsenic will be isolated using engineering and institutional controls. This will apply to lead and arsenic concentrations in soil above the Construction Worker exposure scenario RAG (arsenic RAG=42 mg/kg and lead RAG 950 mg/kg). This site specific Remedial Action Plan calls for covering areas of the site exceeding the RAG for the applicable contaminant with a cover system. These cover systems will include two feet of clean fill used to create a barrier between the identified contamination and potential exposure pathways. These areas include lead contaminated areas on the northeast corner of the former Burt Company parcel, and extend into the southern edge of the Cornell Street property as well as two areas of arsenic contamination in the central and southwestern portion of the Burt Company parcel. STI proposes to use previously delineated areas of contamination identified on Figures within St. Germain & Associates *Site Investigation Report Parcel CP Morrill's Crossing Project, Allen Avenue, Portland, Maine, January 25, 2008*. Additionally, cover systems installed onsite will be identified on the project's as-built plan indicating areas of engineering controls.

This property will also be required to implement institutional controls which will be stated within the Declaration of Environmental Covenant ("Declaration") pursuant to the Uniform Environmental Covenants Act, 38 M.R.S.A. § 3001 et seq. These will likely include adherence to a Soils Management Plan, continued commercial use of the property, and no installation of groundwater extraction wells on the property without prior permission from the Department. This document, once approved by the Department, will be recorded in the Cumberland County Registry of Deeds for each parcel.

Closure

This application has been completed following discussions with the applicant indicating the Application for Assistance would be submitted for both properties, and based on existing environmental data, would not require additional Phase II Environmental Site Assessments. Based on the impending land swap and desire to institute engineering controls prior to the property transaction and winter conditions, VRAP's prompt review of the enclosed application and materials would be most appreciated. STI believes that, based on the impending engineering controls, the continued commercial use of the property, and lack of

nearby drinking water wells; this property does not pose a threat to public health, welfare, and the environment. STI is requesting the MDEP to issue a "No Action Assurance" letter stating that if the Remedial Action Plan is properly implemented, and any future soils are to be excavated/handled in accordance with a Soils Management Plan, the Department will assure the applicant that no enforcement action will be taken.

STI appreciates your timely review and comment on the enclosed application and recommendation. Should you have any questions, I am available at (207) 200-2052.

Sincerely,

SEBAGO TECHNICS, INC.



Grant E. Austin
Environmental Scientist

GEA/llg
Enc., Application for Assistance
Application Fee
Phase I Environmental Site Assessments

cc: Greg Mitchell, City of Portland



Maine Department of Environmental Protection

Maine Voluntary Response Action Program

Application for Assistance

Please complete this application to request technical assistance from the Voluntary Remedial Action Plan Program (VRAP) pursuant to Title 38 MRSA, Section 342, Subsection 15.

General Site Information

Property name: Cambridge & Cornell Street Properties
Street Address: 1 Cambridge & 21 Cornell Streets
City (or Township): Portland
Tax map #: 151A-A Lot #: 13 & 21
UTM Coordinates (Map Datum: NAD83): 396216.97E 4838001.38N
Total Acreage of Property (all parcels): 4.53

Property Description Recorded at Registry of Deeds

County: Cumberland Book: 4256 Page: 60

Applicant Information

Applicant/Organization*: City of Portland
Contact Person: Greg Mitchell Title: Economic Development Director
Address: 389 Congress Street
City: Portland State: ME Zip: 04101
Phone: 874-8945 Fax: 756-8217
E-mail: gmitchell@portlandmaine.gov

*The applicant/co-applicant are the individual(s) or organization(s) that will be the recipient of any applicable administrative or liability assurances provided by VRAP. The applicant is also responsible for payment of fees for Department review and oversight costs.

Co-Applicant Information (if applicable)

Co-Applicant/Organization*:

Contact Person: Title:
Address:
City: State: Zip:
Phone: Fax:
E-mail:

Co-Applicant/Organization*:

Contact Person: Title:
Address:
City: State: Zip:
Phone: Fax:
E-mail:

Current property owner (if different than applicant)

Name: Vincent Veroneau Title: President
Organization: J.B. Brown & Sons
Address: P.O. Box 207
City: Portland State: ME Zip: 04112
Phone: 774-5908 Fax: 774-0898
E-mail: veroneau@jbbrown.com

Involvement with other regulatory programs

Yes

None known

If yes, list the program/contact person from the Department: Brian Beneski-Uncontrolled Sites

Contact person(s)

Please list the name(s) of your current environmental consultant and legal counsel.

Consultant: Grant Austin _____ of Sebago Technics, Inc.

Address: 75 John Roberts Road, Suite 1A

City: South Portland State:ME Zip: 04106

Phone: 200-2052 Fax: 856-0277

E-Mail: gaustin@sebagotechnics.com

Attorney: Michael Goldman of City of Portland

Address: 389 Congress Street

City: Portland State:ME Zip: 04101

Phone: 874-8480 Fax: 874-8497

E-mail: mig@portlandmaine.gov

As applicant/co-applicant, agents that may act on my behalf (list, if any):

For _____, _____ of _____.

For _____, _____ of _____.

For _____, _____ of _____.

For _____, _____ of _____.

For _____, _____ of _____.

Certification

I hereby make a request of VRAP to assist me and the company/organization I represent in determining whether the above-described property has been the site of a release or threatened release of a hazardous substance, hazardous waste, hazardous matter, special waste, pollutant or contaminant, including petroleum products or by-products. I understand this assistance may include the review of agency records and files, and review and approval of my investigation plans and reports as well as remedial action plans and implementation.

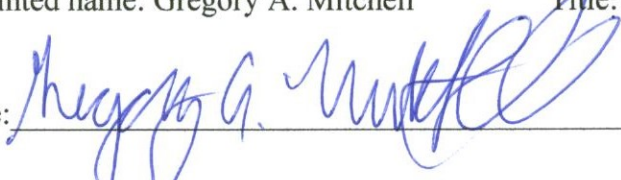
I am aware that the property listed in this application will be placed on the Division of Remediation's Sites List Database that is located on the Department's website, and that any documents I submit to the Department are publicly available through their file room. I am also aware that VRAP, at its discretion, may contact municipal officials regarding investigation/ remedial actions at sites participating in the program.

I am further aware that I must reimburse VRAP for the costs of providing this assistance. I understand that reimbursement requests may be made on a periodic basis and that failure to reimburse VRAP for costs in a timely manner may result in disqualification from VRAP and/or liens being placed on the property.

Typed/printed name: Gregory A. Mitchell
Director

Title: Economic Development

Signature: _____



Date: _____

11-23-15

*******Note: For Properties with Petroleum Discharges from USTs or ASTs*******

If your property has petroleum discharges (or potential discharges) related to an underground storage tank ("UST") or aboveground storage tank ("AST") facility, **please also sign the following:**

I hereby agree to comply with Title 38 MRSA, Section 568 A.4, which includes the submittal of work plans, budgets, and schedules to the Department for review and approval. I also agree to keep a detailed record of all costs associated with the investigation and cleanup of petroleum discharges at the property, and will submit estimates of past costs to investigate and cleanup petroleum discharges at the property that have been incurred prior to making this application.

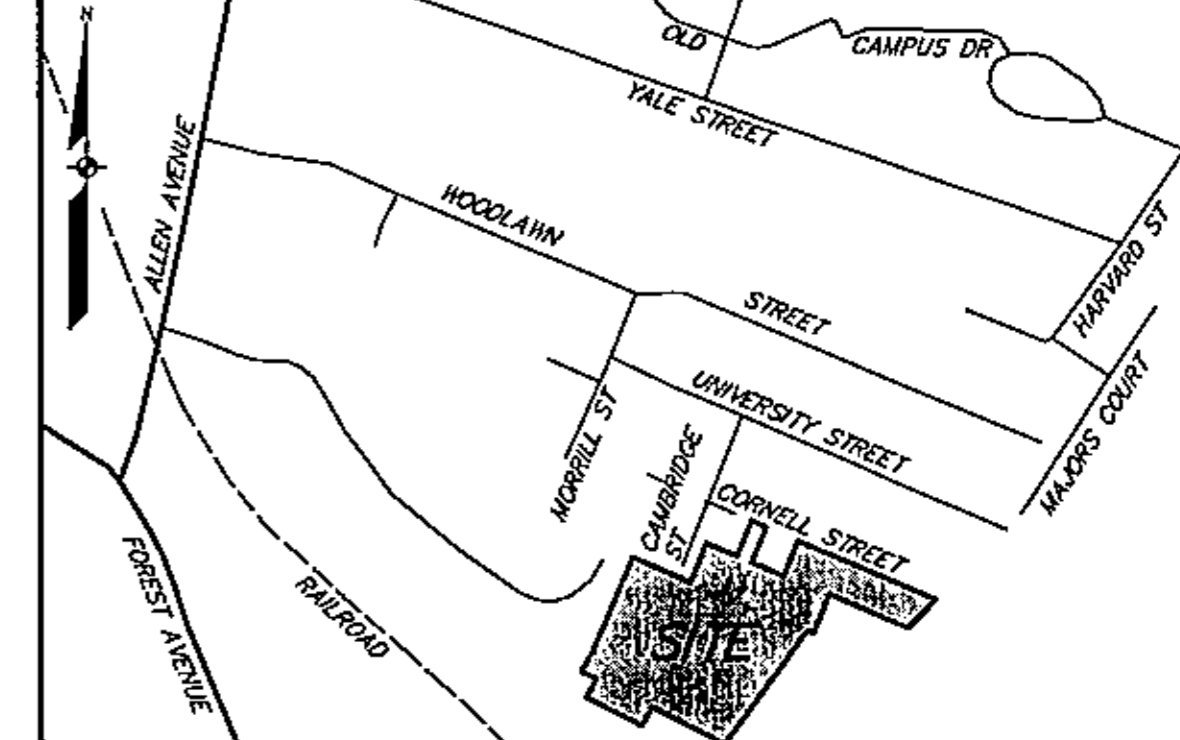
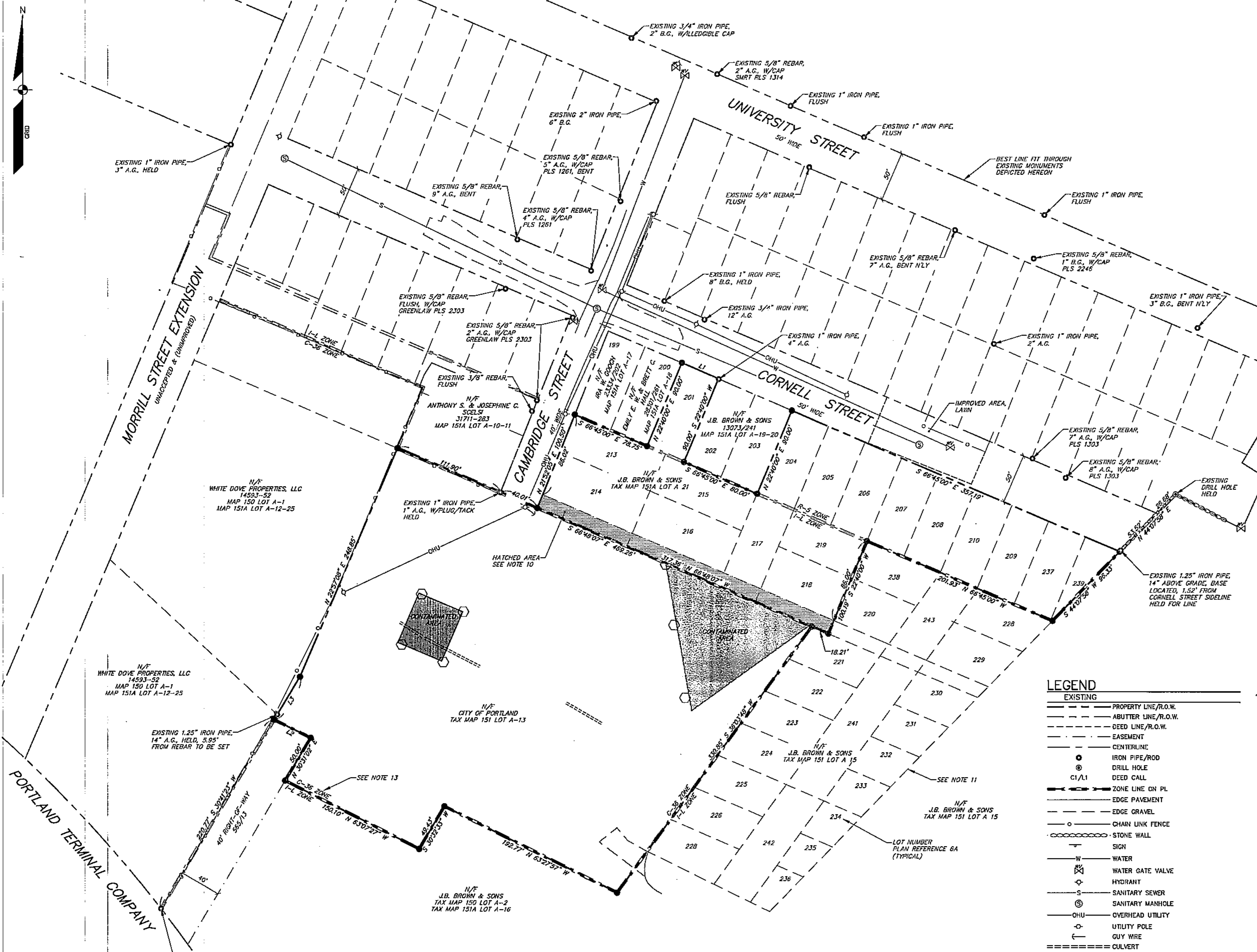
Typed/printed name: _____

Title: _____

Signature: _____

Date: _____

Revised : 4/17/08



LOCATION MAP N.T.S.

GENERAL NOTES:

- THE RECORD OWNER OF THE LOT A-21 ON TAX MAP 151A IS J.B. BROWN & SONS BY DEED DATED APRIL 24, 1978 AND RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN BOOK 4255, PAGE 60, AND LOT A-15 ON TAX MAP 151A IS J.B. BROWN & SONS BY DEED DATED APRIL 24, 1978 AND RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN BOOK 4255, PAGE 80. THE RECORD OWNER OF THE LOT A-13 ON TAX MAP 151A IS THE CITY OF PORTLAND BY DEED DATED APRIL 24, 1978 AND RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN BOOK 4255, PAGE 60.
- THE PROPERTY IS SHOWN AS LOTS A-13 AND A-21 ON THE CITY OF PORTLAND TAX MAP 151A AND IS LOCATED IN THE R-5, I-L AND C-36 ZONING DISTRICTS.
- SPACE AND BULK CRITERIA FOR THE R5, IL AND C36 ZONING DISTRICTS ARE AS FOLLOWS:

R-5	I-L	C-36 (B-2)
NET RESIDENTIAL DENSITY:	3,000 S.F.	N/A
MINIMUM LOT SIZE:	6,000 S.F.	NONE
MINIMUM STREET FRONTAGE:	50 FEET	80 FEET
MINIMUM FRONT YARD:	20X LOT DEPTH	25 FEET
MINIMUM SIDE YARD:	12 FEET (2 ST)	25 FEET+
MINIMUM REAR YARD:	20 FEET	25 FEET+
MAXIMUM BUILDING HEIGHT:	35 FEET	45 FEET
MAXIMUM LOT COVERAGE:	40%	65%
- TOTAL AREA OF PARCEL DEPICTED HEREON AS TAX MAP 151A LOT A-21 IS APPROXIMATELY 65,073 SQUARE FEET OR 1.51 ACRES. TOTAL AREA OF PARCEL DEPICTED HEREON AS TAX MAP 151A LOT A-13 IS APPROXIMATELY 136,717 SQUARE FEET OR 3.14 ACRES.
- BOUNDARY AND TOPOGRAPHIC INFORMATION SHOWN HEREON IS BASED UPON FIELDWORK PERFORMED BY SEBAGO TECHNICS, INC. IN DECEMBER 2015.
- PLAN REFERENCES:
 - PLAN OF SUBDIVISION OF ADDITION TO HAWTHORNE HEIGHTS EXTENSION MADE FOR GEO. EDWARDS REAL ESTATE CO. DATED NOVEMBER 1921 FROM SURVEYS BY PERCY RICHARDSON, C.E. THIS PLAN IS RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN PLAN BOOK 14, PAGE 77.
 - PLAN OF SUBDIVISION IN PORTLAND, MAINE MADE FOR J.B. BROWN & SONS DATED MARCH 27, 1981 BY H.L. & E.C. JORDAN. THIS PLAN IS RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN PLAN BOOK 130, PAGE 43.
 - PLAN SHOWING A PROPOSED DIVISION MADE FOR CARL SHAW, 33 ALLEN AVENUE, PORTLAND, MAINE DATED FEBRUARY 25, 1989 BY DANIEL J. DALFONSO, LAND SURVEYOR. THIS PLAN IS RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN PLAN BOOK 159, PAGE 116.
 - SUBDIVISION RECORDING PLAN AT MORRILL CROSSING ALLEN AVE., MAGNOLIA ST., PRINCETON ST., MORRILL ST., EXTENSION, PORTLAND, MAINE OWNER OF RECORD ALLEN AVENUE PLAZA LLC, ET AL, 33 ALLEN AVENUE, PORTLAND, MAINE 04103 DATED JULY 1, 2005 BY OWEN HASKELL, INC. THIS PLAN IS RECORDED AT THE CUMBERLAND COUNTY REGISTRY OF DEEDS IN PLAN BOOK 209, PAGE 201.
- PLAN ORIENTATION IS GRID NORTH, MAINE STATE PLANE COORDINATE SYSTEM, WEST ZONE 1802-NAD83, ELEVATIONS DEPICTED HEREON ARE NAVD83, BASED ON DUAL FREQUENCY GPS OBSERVATIONS.
- UTILITY INFORMATION DEPICTED HEREON IS COMPILED USING PHYSICAL EVIDENCE LOCATED IN THE FIELD. UTILITIES DEPICTED HEREON MAY NOT NECESSARILY REPRESENT ALL EXISTING UTILITIES. CONTRACTORS AND/OR DESIGNERS NEED TO CONTACT DIG-SAFE SYSTEMS, INC. (1-888-DIG-SAFE) AND FIELD VERIFY EXISTING UTILITIES PRIOR TO CONSTRUCTION AND/OR EXCAVATION.
- THE LOCUS PROPERTY AS DEPICTED HEREON DOES NOT FALL WITHIN A SPECIAL FLOOD HAZARD AREA AS DELINEATED ON THE FLOOD INSURANCE RATE MAP FOR THE CITY OF PORTLAND, MAINE, CUMBERLAND COUNTY, COMMUNITY-PANEL NUMBER 230051 0007 C, HAVING AN REVISION DATE OF DECEMBER 8, 1998. THE LOCUS FALLS WITHIN AN AREA IDENTIFIED AS ZONE X, AREAS DETERMINED TO BE OUTSIDE THE 500-YEAR FLOODPLAIN.
- THIS HATCHED AREA REPRESENTS AN AREA BETWEEN THE EXTENTS OF PLAN REFERENCE 6A, HAWTHORNE HEIGHTS EXTENSION ... AND TAX MAP 151A LOT A-13, LAND OWNED BY THE CITY OF PORTLAND. THE HAWTHORNE HEIGHTS EXTENSION PLAN WAS RECONSTRUCTED UTILIZING THE PLAN INFORMATION AND EXISTING MONUMENTATION DEPICTED HEREON. THE HATCHED AREA REPRESENTS LAND BETWEEN THE PLAN AND ABUTTING LAND OWNED BY THE CITY OF PORTLAND. THE RECORDS (DEEDS) FOR THESE HISTORICAL PARCELS CALL FOR ABUTTING LAND OWNERS, THEREFORE THERE IS NO GORE/GAP BETWEEN THE PARCELS. SEBAGO TECHNICS, INC. HAS EXTENDED THE HAWTHORNE HEIGHTS EXTENSION PLAN TO INTERSECT THE CITY OF PORTLAND PARCEL.
- THE SOUTHERLY LINE AS DEPICTED ON PLAN REFERENCE 6A (HAWTHORNE HEIGHTS EXTENSION ...) APPEARS TO BE WRONG WITH REGARD TO THE LOCATION OF THE SOUTHERLY BOUNDARY OF THE SUBDIVIDED PARCEL. THE EXISTING DRILL HOLE LOCATED AT THE STONE WALL CORNER AND THE EXISTING IRON PIPE AT THE END OF THE STONE WALL REFLECT THE LOCATION OF THE SOUTHERLY PROPERTY LINE AS DEPICTED ON THE HAWTHORNE HEIGHTS EXTENSION ... PLAN. SEBAGO TECHNICS, INC. HAS HELD THE LOCATION OF THESE MONUMENTS IN RE-TRACING THE SOUTHERLY LINE OF THE HAWTHORNE PLAN. ALL OF THE LOTS ON THE HAWTHORNE PLAN INDICATE +/- DISTANCE FOR LOT DEPTHS FOR LOTS 228 THROUGH 236 ON THE HAWTHORNE PLAN. IN RE-TRACING THE HAWTHORNE PLAN MONUMENTS DEPICTED HEREON WERE EVALUATED BASED ON THEIR AGE, STREET LINES AND LOTS WERE RE-CONSTRUCTED BASED ON THESE MONUMENTS WORKING WESTERLY FROM UNIVERSITY STREET. IT SHOULD BE NOTED THAT THE HAWTHORNE PLAN DOES NOT SHOW/INDICATE THAT ANY MONUMENTS WERE SET. IT SHOULD ALSO BE NOTED THAT THE RECORDED PLAN STATES THAT THE PLAN WAS DRAWN FROM SURVEYS OF BOUNDARIES BY PERCY H. RICHARDSON, C.E. SEBAGO TECHNICS, INC. IS UNSURE OF WHO ACTUALLY DRAFTED THE RECORDED PLAN.
- IT IS THE RECOMMENDATION OF SEBAGO TECHNICS, INC. THAT THE CITY OF PORTLAND AND J.B. BROWN & SONS SHOULD EXECUTE OUTCLAIM DEEDS BETWEEN THEMSELVES AND WITH ABUTTING PARTIES TO CLARIFY THE BOUNDARIES.
- AN E-MAIL DATED DECEMBER 16, 2015 FROM BARBARA BARNHOUT OF THE CITY OF PORTLAND PLANNING DEPARTMENT STATES THAT THE PORTLAND PLANNING BOARD IS RECOMMENDING TO THE PORTLAND CITY COUNCIL THAT THIS C-36 CONTRACT ZONE BE RESCINDED AND THE ZONING RETURN TO THE UNDERLYING ZONE (B-2). THE COUNCIL WILL CONSIDER THIS RECOMMENDATION IN JANUARY 2016.

LEGEND

EXISTING	
—	PROPERTY LINE/R.O.W.
---	ABUTTER LINE/R.O.W.
---	DEED LINE/R.O.W.
---	EASEMENT
---	CENTERLINE
○	IRON PIPE/ROD
○	DRILL HOLE
○	DEED CALL
---	ZONE LINE ON PL
---	EDGE PAVEMENT
---	EDGE GRAVEL
---	CHAIN LINK FENCE
---	STONE WALL
---	SIGN
---	WATER
---	WATER GATE VALVE
---	HYDRANT
---	SANITARY SEWER
---	SANITARY MANHOLE
---	OVERHEAD UTILITY
---	UTILITY POLE
---	GUY WIRE
---	CULVERT
○	GRADE STAKE SET
●	5/8" REBAR S11 PLS 2009 TO BE SET

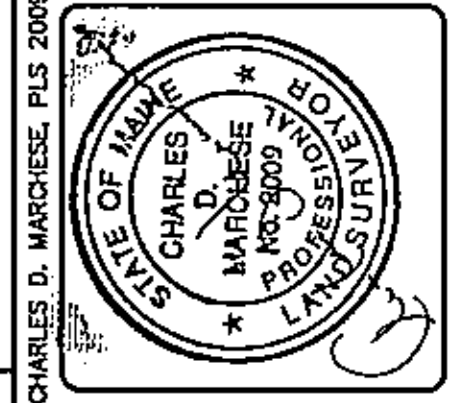
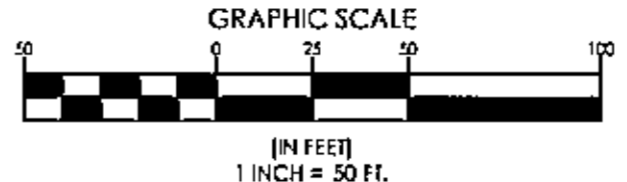
PROPERTY LINE TABLE

LINE	DIRECTION	DISTANCE
L1	S 66°45'00" E	40.00'
L2	N 63°29'28" W	40.77'
L3	S 30°41'23" W	50.35'

SURVEYOR'S STATEMENT

THIS SURVEY WAS PERFORMED UNDER MY DIRECT SUPERVISION AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, IT WAS DONE IN ACCORDANCE WITH CHAPTER 90, PART 1 (PROFESSIONAL STANDARDS OF PRACTICE) AND PART 2 (TECHNICAL STANDARDS OF PRACTICE) OF THE MAINE BOARD OF LICENSURE FOR PROFESSIONAL LAND SURVEYORS.

Charles D. Marchese
 CHARLES D. MARCHESE, PLS 2009 DECEMBER 17, 2015



DESIGNED	CDM	CHECKED	CLB
REVISION	DATE	STATUS	ISSUED TO CLIENT
A	11-17-15	ISSUED TO CLIENT	

SEBAGO TECHNICS
 WWW.SEBAGOTECHNICS.COM
 75 John Roberts Rd.
 Suite 1A
 South Portland, ME 04106
 Tel. 207-200-2100

BOUNDARY RETRACEMENT SURVEY
 BY LAND OWNED BY: PORTLAND MAINE & THE CITY OF PORTLAND MAINE & J.B. BROWN & SONS
 FOR: THE CITY OF PORTLAND MAINE
 PROJECT NO. 15428 SCALE 1" = 50'
 SHEET 1 OF 1



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

AVERY T. DAY
ACTING COMMISSIONER

December 28, 2015

City of Portland
c/o Greg Mitchell, Economic Development Director
389 Congress Street
Portland, ME 04101

Re: Receipt of Voluntary Response Action Program Application

Mr. Greg Mitchell:

The Maine Department of Environmental Protection’s Voluntary Response Action Program (VRAP) has received your application for the property identified as Burt Company, including parcels located at 1 Cambridge Street and 21 Cornell Street in Portland, Maine. You have requested that the property participate in VRAP and receive the protection from Department enforcement actions as provided by VRAP law.

I have been assigned as the VRAP Project Manager for this project, and will be your main point of contact. The Project Geologist for this project is Troy Smith. We will be reviewing the information you submitted with the application, as well as visiting the property at a time that is convenient. We anticipate providing our response to the information you’ve submitted by January 15, 2015.

You will be required to reimburse VRAP for any costs incurred during our review and oversight of the project. Please see the attached memo regarding typical costs for participating in VRAP.

We look forward to working with you and your consultant on this project. Please feel free to call me at 207-287-6222 if you have any questions.

Sincerely,

Benjamin Guidi
Voluntary Remediation Action Program
Division of Remediation

cc: Vincent Veroneau, J.B. Brown & Sons
Grant Austin, STI
Michael Goldman, Portland

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
ACTING COMMISSIONER

MEMORANDUM

To: Voluntary Response Action Program (VRAP) Users

From: Nicholas Hodgkins, VRAP Coordinator

Date: July 28, 2011

Re: Anticipated costs for participating in VRAP

As part of the continuing effort to improve how we serve our clients, the Voluntary Response Action Program (VRAP) offers this memo as guidance for estimating the Department’s costs for projects participating in VRAP. Following this guidance will help an applicant anticipate the costs that VRAP will request the applicant to reimburse.

Under the “Commissioner’s Duties” section of Maine law (38 MRSA 342, §15), the VRAP program may charge up to \$50 per hour for the assistance the program provides. This hourly fee includes the direct and indirect costs of a VRAP staff member providing that assistance. Currently, neither the VRAP Coordinator, the VRAP Project Managers, nor the VRAP Geologists or Engineers are charged at \$50 an hour, so estimating \$50 per hour for VRAP staff time is essentially an over-estimate of costs.

For the average VRAP project, staff costs are typically between \$500 and \$1500 total (not counting the \$500 VRAP fee). For every VRAP site, these staff costs will include:

- At least one site visit by the Project Manager and the Project Geologist;
- A review of all the material submitted with the application; and
- Development of VRAP certification documents.

The time it takes to do any of these tasks varies depending on the following factors:

- Completeness of the VRAP application package. Failure to submit the materials and information described in the “VRAP Application Submittal” memo will likely result in VRAP staff spending more time reviewing the project documents. The “VRAP Application Submittal” memo may be found on our website at: <http://www.maine.gov/dep/rwm/vrap/appsub.htm>
- Quality of the work completed. If reports submitted are incomplete, poorly written, poorly organized, etc., it will likely take longer to do a comprehensive review.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

- Distance of subject property from Augusta. All VRAP staff will be travelling from Augusta to your site; if you are two hours from Augusta, you could estimate that staff (a Project Manager and a Geologist) will travel to your site, spend an hour or so there observing the site and surrounding area. That would be five hours for each staff person, or ten hours total. The estimate for this task would be \$500.
- Need for VRAP staff to be present during remedial actions. It is not unusual for VRAP staff to be present for at least a portion of the remedial actions.
- Duration of the project; projects that apply to VRAP and take a number of years to complete often require more hours.

If you would like an estimate of VRAP costs for your specific site, please contact your VRAP Project Manager.

Generally speaking, VRAP applicants will be billed for costs on a quarterly basis if at least 10 hours of staff time have been accumulated since the previous billing (or the start of the project); those sites not requiring more than 10 hours of staff time will be billed at the completion of the project. VRAP will also consider alternative billing schedules if requested by the applicant. A VRAP project is complete once the final certification and/or any required deed covenants are recorded and a copy of the recorded documents are submitted to the VRAP.

Failure to reimburse the VRAP for costs may invalidate any protections issued pursuant to the VRAP law, and may result in a lien being placed on the subject property or actions by Maine Revenue Services.



DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND AND WATER QUALITY

1/15/2016

CONTACT_ID 11,033

FIELD DETERMINATION FORM

CONTACT

PETER KELLY
413 PRESUMPCOT STREET
PORTLAND, ME 04103
2079391105

DIRECTIONS

Property is at end of Quarry Road. Enter from Read Street. Park in parking lot across train tracks adjacent to NEPW Logistics storage building and will see entrance to lot. Three culverts have been put in new entrance.

PROPERTY OWNER

CITY OF PORTLAND
389 CONGRESS STREET
PORTLAND, ME 04101

ATTN: Greg Mitchell
Planning Department
HARRIS, JENNIFER

STAFF

SITE TOWN PORTLAND
MAP LOT
151A 013

MEMO

Thank you for requesting a field determination and meeting me near 1 Cambridge Street (Map 151A, Lot 013) in Portland on December 15, 2016. The city of Portland gained this property circa 1998, through bankruptcy proceedings. A factory had existed on this property prior to 1992 and the buildings were declared an attractive nuisance and a public health hazard by the Maine Department of Environmental Protection, Division of Remediation in 1998. The buildings were demolished by the city in 1999.

After inspecting the area I was able to identify a jurisdictional stream as defined by the Natural Resources Protection Act (NRPA) (38 M.R.S.A. 480B-9); just east of the new entrance to the property near 70 Quarry road (please see attached map: -43°41'13.744"N / 70°17'16.721"W). This stream has a defined channel, displays a mineral bottom, and contains Caddis fly cases. Any soil disturbances within 75 feet of the stream would require a Section 2 Permit by Rule (PBR) for activities adjacent to a resource. Any soil disturbance activities within 25 feet of the stream would require an Individual NRPA permit. Areas having slopes steeper than 3 Horizontal: 1 Vertical foot may not be counted when determining the 25 foot setback.

A potential scrub / shrub wetland existed on the property prior to this summer, 2015. However, the area was heavily disturbed when it was cut and stumped. Have a wetland delineation performed by a professional. Up to 4,300 square feet of the wetland may be altered without a Natural Resources Protection Act (NRPA) permit (38 M.R.S.A. Section 480-Q-17). All wetland alteration since 9/29/95 is counted as a sum total towards this exemption from permitting. Any alteration above 4,300 square feet will require a NRPA permit from the Department for wetland alteration.

A straight, excavated, channel runs through the property and connects to the jurisdictional stream. This channel was determined to be a drainage and not a jurisdictional resource. However, this drainage must be monitored for potential discharges to waters of the state. Maintenance of this drainage does not require a permit from the Department, unless it occurs within 75 horizontal feet of the jurisdictional river, stream or brook. Erosion and sedimentation control measures must be installed during maintenance to prevent discharges into the regulated stream. A discharge to waters of the state requires a license from the Department (38 M.R.S.A. Section 413-1).

NAME:

Handwritten signature: Jennifer Harris

RECEIVED 12/11/2015 SITE VISIT 12/15/2015 COMPLETED 1/15/2016



DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND AND WATER QUALITY

1/15/2016

CONTACT_ID 11,033

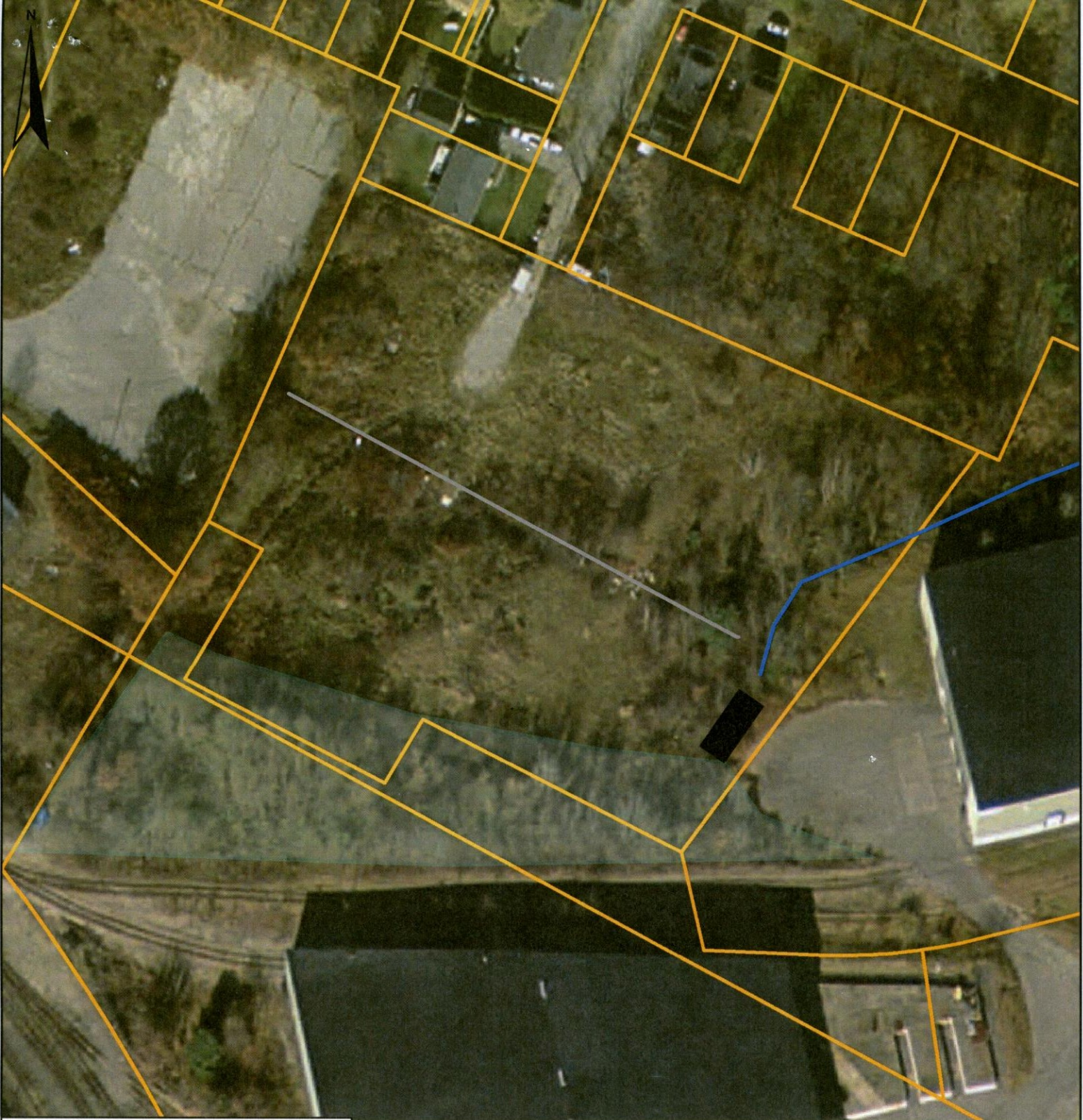
FIELD DETERMINATION FORM

Please make sure that all local permits, as well as applicable DEP permits, have been obtained prior to starting any work. Erosion control devices must be installed and maintained on the project site during any soil disturbance activity. A Stormwater Management Law PBR or Maine Construction General Permit "NOI" and "NOT" must be filed with the Department if more than 1 acre of area is going to be disturbed on the project site at any given time during construction.

NAME: _____

2

RECEIVED 12/11/2015 SITE VISIT 12/15/2015 COMPLETED 1/15/2016



70 Quarry Road
 Portland, ME
 43°41'14.91"N / 70°17'21.883"W



Map Notes:
 - Land Licensing Sites were either digitized on screen or collected using a Garmin Etrex GPS Unit. Feature locations have an accuracy of +/- 15 meters.
 - Background hydrologic, topographic and political features are from MEGIS data layers with an accuracy of +/- 40 feet.
 - All spatial data is projected to NAD 1983 UTM Zone 19.
 - All spatial data is specific to Maine DEP Bureau of Land and Water Quality.
 - Data is maintained by the Maine DEP GIS Unit and DLRR. This map is to be used for reference purposes only and does not represent authoritative locations of displayed features.

Map Prepared By: J. Harris
 Maine DEP, BLR,
 Division of Land
 1/07/2016

0 35 70 140 210 Feet



Legend

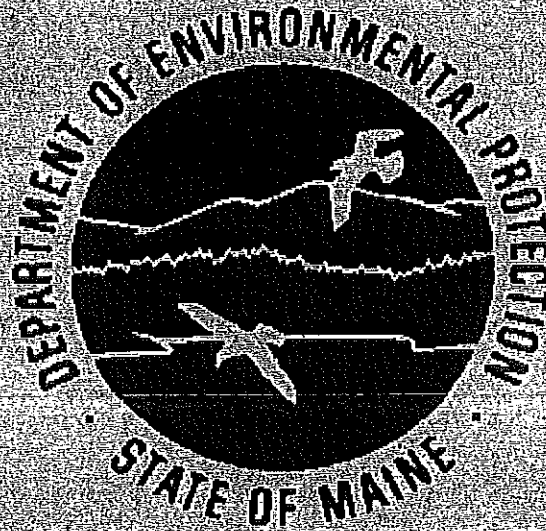
- Drainage
- Stream Identified
- New Crossing
- Potential Wetland
- Organized Towns
- Small Wetlands (points)
- Large Wetlands (polys)

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL RESOURCES PROTECTION ACT

Permit By Rule Standards

Chapter 305

SECTION 2
Activities adjacent to protected natural resources

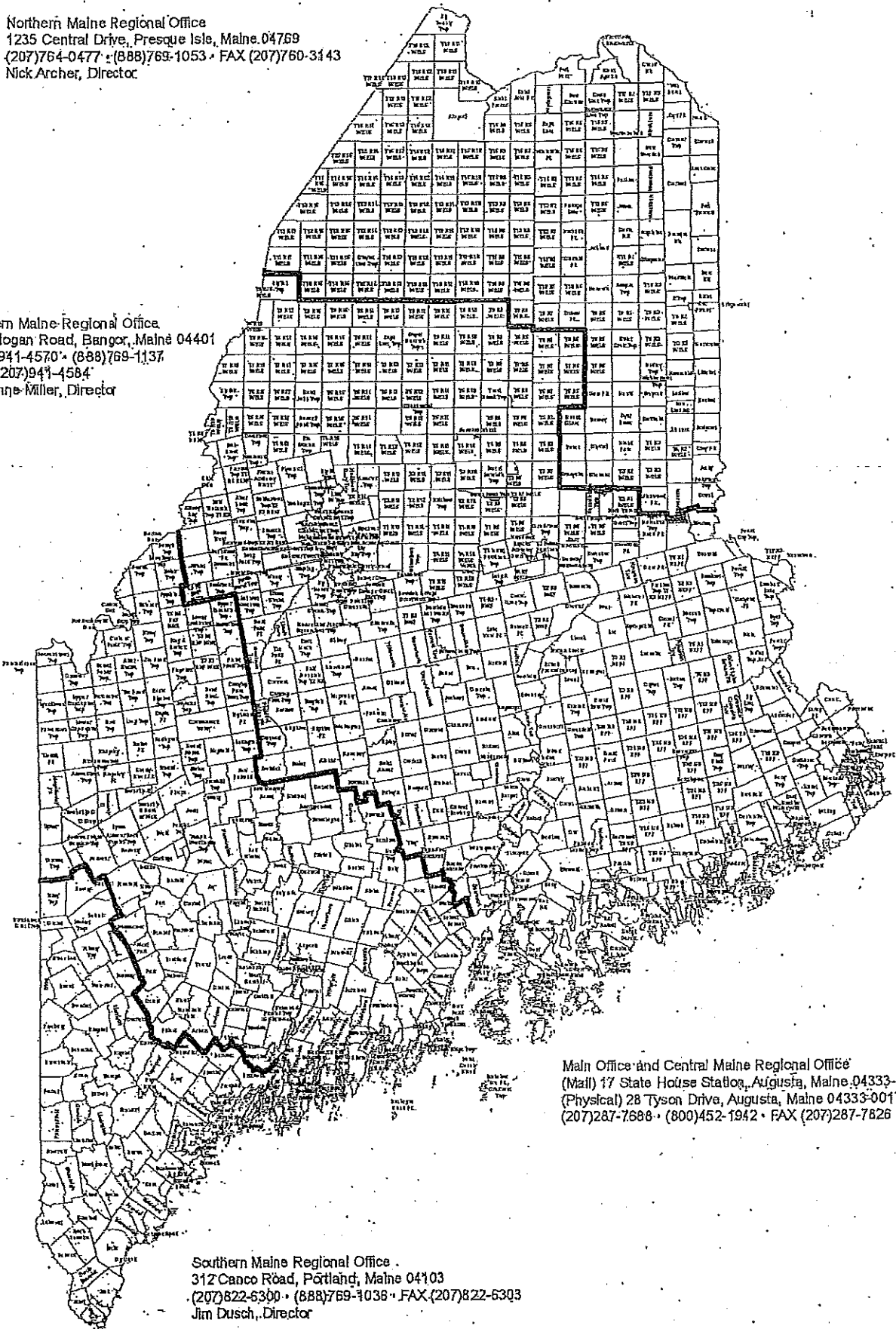


Bureau of Land and Water Quality

Effective February 1989
Revised July 15, 2011

Northern Maine Regional Office
 1235 Central Drive, Presque Isle, Maine 04769
 (207)764-0477 • (888)769-1053 • FAX (207)760-3143
 Nick Archer, Director

Eastern Maine Regional Office
 105 Hogan Road, Bangor, Maine 04401
 (207)941-4570 • (888)769-1137
 FAX (207)941-4584
 Susanne Miller, Director



Main Office and Central Maine Regional Office
 (Mail) 17 State House Station, Augusta, Maine 04333-0017
 (Physical) 28 Tyson Drive, Augusta, Maine 04333-0017
 (207)287-7888 • (800)452-1942 • FAX (207)287-7826

Southern Maine Regional Office
 312 Canco Road, Portland, Maine 04103
 (207)822-6300 • (888)769-1036 • FAX (207)822-6303
 Jim Dusch, Director

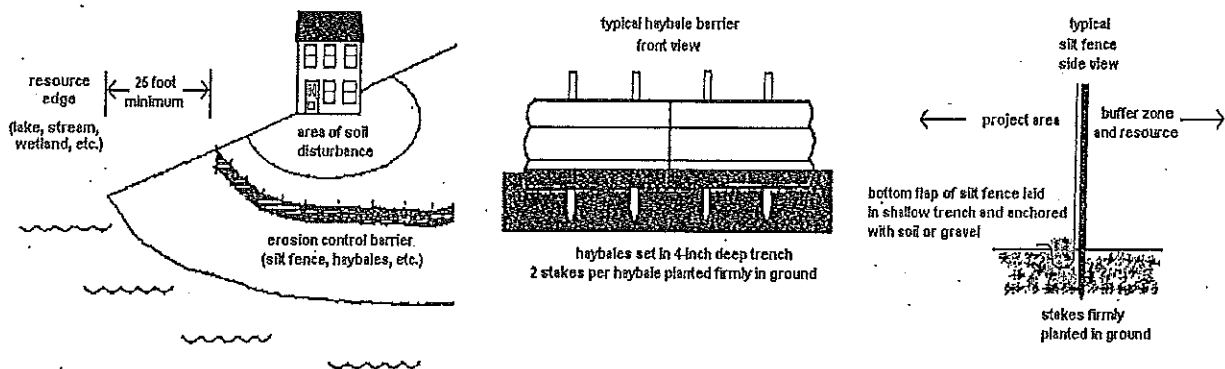


STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION, AUGUSTA, MAINE 04333

Erosion Control for Homeowners

Before Construction

1. If you have hired a contractor, make sure you discuss your permit-by-rule with them. Talk about what measures they plan to take to control erosion. Everybody involved should understand what the resource is, and where it is located. Most people can identify the edge of a lake or river. However, the edges of wetlands are often not so obvious. Your contractor may be the person actually pushing dirt around, but you are both responsible for complying with the permit-by-rule.
2. Call around to find where erosion control materials are available. Chances are your contractor has these materials already on hand. You probably will need silt fence, hay bales, wooden stakes, grass seed (or conservation mix), and perhaps filter fabric. Places to check for these items include farm & feed supply stores, garden & lawn suppliers, and landscaping companies. It is not always easy to find hay or straw during late winter and early spring. It also may be more expensive during those times of year. Plan ahead -- buy a supply early and keep it under a tarp.
3. Before any soil is disturbed, make sure an erosion control barrier has been installed. The barrier can be either a silt fence, a row of staked hay bales, or both. Use the drawings below as a guide for correct installation and placement. The barrier should be placed as close as possible to the soil-disturbance activity.
4. If a contractor is installing the erosion control barrier, double check it as a precaution. Erosion control barriers should be installed "on the contour", meaning at the same level or elevation across the land slope, whenever possible. This keeps stormwater from flowing to the lowest point along the barrier where it can build up and overflow or destroy the barrier.



During Construction

1. Use lots of hay or straw mulch on disturbed soil. The idea behind mulch is to prevent rain from striking the soil directly. It is the force of raindrops hitting the bare ground that makes the soil begin to move downslope with the runoff water, and cause erosion. More than 90% of erosion is prevented by keeping the soil covered.
2. Inspect your erosion control barriers frequently. This is especially important after a rainfall. If there is muddy water leaving the project site, then your erosion controls are not working as intended. You or

your contractor then need to figure out what can be done to prevent more soil from getting past the barrier.

After Construction

1. After your project is finished, seed the area. Note that all ground covers are not equal. For example, a mix of creeping red fescue and Kentucky bluegrass is a good choice for lawns and other high-maintenance areas. But this same seed mix is a poor selection for stabilizing a road shoulder or a cut bank that you don't intend to mow. Your contractor may have experience with different seed mixes, or you might contact a seed supplier for advice.
2. Do not spread grass seed after September 15. There is the likelihood that germinating seedlings could be killed by a frost before they have a chance to become established. Instead, mulch the area with a thick layer of hay or straw. In the spring, rake off the mulch and then seed the area. Don't forget to mulch again to hold in moisture and prevent the seed from washing away or being eaten by birds or other animals.
3. Keep your erosion control barrier up and maintained until you get a good and healthy growth of grass and the area is permanently stabilized.

Why Control Erosion?

To Protect Water Quality

When soil erodes into protected resources such as streams, rivers, wetlands, and lakes, it has many bad effects. Eroding soil particles carry phosphorus to the water. An excess of phosphorus can lead to explosions of algae growth in lakes and ponds called blooms. The water will look green and can have green slime in it. If you are near a lake or pond, this is not pleasant for swimming, and when the soil settles out on the bottom, it smothers fish eggs and small animals eaten by fish. There many other effects as well, which are all bad.

To Protect the Soil

It has taken thousands of years for our soil to develop. Its usefulness is evident all around us, from sustaining forests and growing our garden vegetables, to even treating our septic wastewater! We cannot afford to waste this valuable resource.

To Save Money (\$\$)

Replacing topsoil or gravel washed off your property can be expensive. You end up paying twice because State and local governments wind up spending your tax dollars to dig out ditches and storm drains that have become choked with sediment from soil erosion.

Notes:

- Section 480-Q (15-A) of the NRPA exempts the installation, removal, or repair of a septic system from permitting requirements as of March 1, 1995, as long as the system complies with all requirements of the Subsurface Wastewater Disposal Rules adopted by the Department of Human Services pursuant to 22 MRSA Section 42 (3).
- The placement of wastewater treatment facilities or disposal systems by people in possession of a DEP-issued overboard discharge license or conditional discharge permit is exempt from the NRPA, subject to certain conditions (see Chapter 596 of DEP Regulations "Overboard Discharges: Licensing, Relicensing, Transfer, and Abandonment of Licenses").

Rev. 8/02

Chapter 305: PERMIT BY RULE

1. **Introduction.** A "permit by rule" or "PBR", when approved by the Department of Environmental Protection (DEP), is an approval for an activity that requires a permit under the Natural Resources Protection Act (NRPA). Only those activities described in this chapter may proceed under the PBR process. A PBR activity will not significantly affect the environment if carried out in accordance with this chapter, and generally has less of an impact on the environment than an activity requiring an individual permit. A PBR satisfies the Natural Resources Protection Act (NRPA) permit requirement and Water Quality Certification requirement.

If a proposed activity is not described in this chapter, or will not be conducted in accordance with the standards of this chapter, the applicant must obtain an individual permit prior to beginning the activity.

- A. **Location of activity.** The location of an activity may affect whether an activity qualifies for PBR, and whether review by the Department of Inland Fisheries and Wildlife is required.

- (1) **Type of resource.** For some types of activities, the availability of a PBR is affected by the type of natural resource in or adjacent to which the activity is proposed. For example, an applicant proposing an activity consisting of "Movement of rocks or vegetation" may receive a PBR only if the activity will take place in a great pond, river, stream or brook. Limitations concerning the location of activities are addressed in the "Applicability" provision in each section of this chapter.
- (2) **Essential habitat.** Essential habitats include areas critical to the survival of threatened and endangered species such as the bald eagle, least tern, roseate tern, and piping plover. If the activity is located in essential habitat, such as near an eagle nesting site, a PBR is only available if the applicant obtains written approval from the Department of Inland Fisheries and Wildlife (IF&W). This approval from IF&W must be submitted to the DEP with the PBR notification form, and the applicant must follow any conditions stated in the IF&W approval.

NOTE: Maps showing areas of essential habitat are available from the Department of Inland Fisheries and Wildlife regional headquarters, municipal offices, the Land Use Regulation Commission (for unorganized territories) and DEP regional offices. If the activity is located in essential habitat, IF&W must be contacted to request and obtain a "certification of review and approval".

- B. **Notification.** The applicant must file notice of the activity with the DEP prior to beginning work on the activity. The notification must be on a form provided by the DEP and must include any submissions required in this chapter. The applicant must keep a copy to serve as the permit.

The notification form must be sent to the DEP by certified mail (return receipt requested), or hand delivered to the DEP and date stamped by the department. By signing the notification form, the applicant is representing that the activity will meet the applicability requirements and standards of the rule. In addition, by signing the notification form the

applicant represents that the applicant has sufficient title, right, or interest in the property where the proposed activity is to take place.

C. Effective period

- (1) Beginning of period. The PBR becomes effective 14 calendar days after the DEP receives the notification form, unless the DEP approves or denies the PBR prior to that date. If the DEP does not speak with or write to the applicant within this 14 day period regarding the PBR notification, the applicant may proceed to carry out the activity.

There are three exceptions regarding the effective date of an approved PBR:

- (a) Activities listed in Section 10 (Stream crossings) occurring in association with forest management are exempt from the 14 day waiting period.
- (b) Activities listed in Section 10 (Stream crossings) performed or supervised by individuals currently certified in erosion control practices by the DEP are exempt from the 14 day waiting period. To be certified in erosion control practices, an individual must successfully complete all course requirements of the Voluntary Contractor Certification Program administered by the DEP's Nonpoint Source Training and Resource Center.
- (c) Activities that are part of a larger project requiring a permit under the Site Location of Development or the Storm Water Management Acts may not proceed until any required permit under those laws is obtained.

NOTE: Activities that are part of a larger project may require other permits from the DEP also. These other laws may prohibit the start of construction of any part of the project unless a permit under that law is obtained. In these cases, while not a violation of this rule, starting work on a PBR approved activity would be a violation of those other applicable laws.

- (2) End of period. The PBR is generally effective for 2 years from the date of approval, except that a PBR for "Replacement of structures" under Section 4 is effective for 3 years.

NOTE: Activities that qualify under this chapter may need to meet other local, state and federal requirements. Examples -- (1) If an activity extends below the low water line of a lake, coastal wetland or international boundary water, the applicant should contact the Bureau of Parks and Lands (287-3061) concerning possible lease or easement requirements, or (2) If an activity will involve work below the mean high water line in navigable waters of the United States, the applicant should contact the Army Corps of Engineers (623-8367).

D. Discretionary authority. Notwithstanding compliance with the PBR applicability requirements and standards set forth in this chapter, the DEP may require an individual permit application to be filed in any case where credible evidence indicates that the activity:

- (1) May violate the standards of this rule or the NRPA (38 M.R.S.A. Section 480-D);

- (2) Could lead to significant environmental impacts, including cumulative impacts; or
- (3) Could adversely impact a resource of special concern.

If an individual permit is required pursuant to this subsection, the DEP shall notify the applicant in writing within the 14 calendar day waiting period described in sub-section (C) above. When the DEP notifies an applicant that an individual permit is required, no work may be conducted unless and until the individual permit is obtained.

E. Violations. A violation of law occurs when a person, or his or her agent, performs or causes to be performed any activity subject to the NRPA without first obtaining a permit from the DEP, or acts contrary to the provisions of a permit. The person, his or her agent, or both, may be held responsible for the violation. Commonly, the "person" is the landowner, and the "agent" is the contractor carrying out the activity. A violation occurs when:

- (1) An activity occurs that is not allowed under PBR, whether or not a PBR notification form has been filed with and/or approved by the DEP;
- (2) An activity occurs that is allowed under PBR, but a PBR for the activity has not become effective prior to the beginning of the activity; or
- (3) An activity occurs that is allowed under PBR and a PBR for the activity is in effect, but the standards specified in this chapter are not met.

See the "applicability" provision under each activity for rules concerning what activities are allowed under PBR. A PBR is only valid for the person listed on the notification form, or for his or her agent.

Each day that a violation occurs or continues is considered a separate offense. Violations are subject to criminal penalties and civil penalties of not less than \$100 nor more than \$10,000 for each day of that violation (38 M.R.S.A. Section 349).

NOTE: A local Code Enforcement Officer (CEO) may take enforcement action for a violation of the Natural Resources Protection Act if he or she is authorized to represent a municipality in District Court, and he or she has been certified as familiar with court procedures, 30-A M.R.S.A. Section 4452(7).

2. Activities adjacent to protected natural resources

A. Applicability

- (1) This section applies to an activity adjacent to, but not in:
 - (a) A coastal wetland, great pond, river, stream or brook or significant wildlife habitat contained within a freshwater wetland; or

- (b) Freshwater wetlands consisting of or containing:
- (i) Under normal circumstances, at least 20,000 square feet of aquatic vegetation, emergent marsh vegetation or open water, except for artificial ponds or impoundments; or
 - (ii) Peatlands dominated by shrubs, sedges and sphagnum moss.
- (2) This section does not apply to an activity where sustained slopes are steeper than 3 horizontal feet: 1 vertical foot (approximately 33% slope) between the normal high water line or upland edge of the protected resource and the soil disturbance.
- (3) Activities that qualify for permit by rule under another section are not required to comply with this section unless expressly stated in that section.
- (4) This section does not apply to an activity that is not or will not be in compliance with the terms and conditions of a permit issued under the Site Location of Development Law, 38 M.R.S.A. Sections 481 to 490, the Storm Water Management Law, 38 M.R.S.A. Section 420-D, or the Natural Resources Protection Act, 38 M.R.S.A. Sections 480-A to 480-Z.
- (5) This section does not apply to an activity that does not conform to the local shoreland zoning ordinance.

NOTE: Contact the local Code Enforcement Officer for information on local shoreland zoning requirements. In most shoreland areas, a 75 or 100 foot undisturbed buffer strip is required between the disturbed areas and the water or wetland.

B. Submissions

- (1) The applicant is required to submit photographs of the area which will be affected by the activity proposed.
- (2) Photographs showing the completed project and the affected area must be submitted within 20 days of the activity's completion. The photographs must be sent with a copy of the notification form or labeled with the applicant's name and the town in which the activity took place.
- (3) A brief narrative explaining why there is no practicable alternative to location of the activity within the 75 foot setback, and how the impact on the remaining buffer and the resource will be minimized. This narrative is not required for those activities presumed to have no practicable alternative as listed in paragraph C(1) of this section.
- (4) A scaled plan or drawing of the area affected, including information such as:
 - (a) The entire property on which the activity will take place, including property lines, the 75 foot setback, and the boundaries or location of protected natural resources such as streams and wetlands;

- (b) Proposed and existing development on the parcel including buildings, parking areas, roads, fill areas, landscaped areas, etc.; and
- (c) Any site constraints limiting development beyond the 75 foot setback, such as steep slopes.

It is not necessary to have the plan professionally prepared. However, it must be legible and drawn to a scale that allows clear representation of distances and measurements on the plan.

C. Standards

- (1) No activity or portion of an activity may be located within the 75 foot setback if there is a practicable alternative location on the parcel that would cause or result in less impact on the environment. The following activities are presumed to have no practicable alternative location on the parcel.
 - (a) The planting of vegetation for the purpose of controlling erosion or for establishing a vegetative buffer.
 - (b) The removal or replacement of underground storage tanks when performed in accordance with 38 M.R.S.A. Section 566-A.
 - (c) The replacement of a structure or the placement or replacement of a foundation or supports for a legally existing structure or addition that is not closer to a protected natural resource than the existing structure provided the municipality has approved the location of the replaced or modified structure. However, any fill, other than that required to maintain the integrity of the structure such as foundation backfill, must meet the 75 foot setback standard unless otherwise approved by the DEP pursuant to this section.

NOTE: In most cases when a structure is being replaced or a foundation is being put under an existing structure that does not meet the setback requirements of the Municipal Shoreland Zoning Ordinance, the applicant is required by the municipality to move the structure back from the natural resource to the maximum extent practicable.

- (d) The closure of a landfill in conformance with the DEP's solid waste management rules.
 - (e) Access way consisting of a footpath, stairway, or steps to the resource.
- (2) Except for those activities listed in Section 2(C)(1)(a)-(e) above, a 25 foot setback must be maintained between the normal high water line or upland edge of the protected natural resource and the activity. Areas that have slopes of 3 horizontal feet: 1 vertical foot (approximately 33% slope), or steeper, may not be counted when determining the 25 foot setback. Existing vegetation within the setback may not be disturbed except for cutting activity meeting the exemption requirements in 38 M.R.S.A. Section 480-Q(23).
 - (3) Disturbance within the setback must be minimized.

- (4) The following measures must be taken to prevent erosion of soil or fill material from disturbed areas:
 - (a) Staked hay bales or silt fence must be properly installed at the edge of disturbed areas between the activity and the resource before the activity begins;
 - (b) Hay bales or silt fence barriers must be maintained until the disturbed area is permanently stabilized;
 - (c) Within 7 calendar days following the completion of any soil disturbance, and prior to any storm event, mulch must be spread on any exposed soils;
 - (d) All disturbed soils must be permanently stabilized; and
 - (e) Within 30 days of final stabilization of the site, any silt fence must be removed.
- (5) A footpath to the resource is limited to 6 feet in width and stairs or steps are limited to 4 feet in width.
- (6) All work is limited to the location and extent depicted on the plan or plans submitted pursuant to subsection B(4) of this section.

NOTE: For guidance on erosion and sedimentation controls, consult the Maine Erosion and Sediment Control BMPs, dated March 2003. This handbook and other references are available from the DEP.

D. Definitions. The following terms, as used in this chapter, have the following meanings, unless the context indicates otherwise:

- (1) Fill. a. (verb) To put into or upon, supply to, or allow to enter a water body or wetland any earth, rock, gravel, sand, silt, clay, peat, or debris; b. (noun) Material, other than structures, placed in or adjacent to a water body or wetland.
- (2) Land adjacent to a protected natural resource. Any land area within 75 feet, measured horizontally, of the normal high water line of a great pond, river, stream or brook or the upland edge of a coastal wetland or freshwater wetland.
- (2-A) Practicable. Available and feasible considering cost, existing technology and logistics based on the overall purpose of the project.
- (3) Structure. Anything built for the support, shelter or enclosure of persons, animals, goods or property of any kind, together with anything constructed or erected with a fixed location on or in the ground. Examples of structures include buildings, utility lines and roads.
- (4) Upland edge. The boundary between upland and wetland.

NOTE:

Section 480-Q(15-A) of the NRPA exempts the installation, removal or repair of a septic system from permitting requirements as of March 1, 1995, as long as the system complies with all requirements of the subsurface wastewater disposal rules adopted by the Department of Human Services pursuant to 22 M.R.S.A. Section 42(3).

Additional Definitions

The following terms are defined under the Natural Resources Protection Act. They are included here for your reference and attention because the ability to perform activities under Permit by Rule is dependent upon them. Any questions about these terms meanings should be directed specifically to the Bureau of Land and Water Quality staff.

1. **Coastal sand dune systems.** "Coastal sand dune systems" means sand and gravel deposits within a marine beach system, including, but not limited to, beach berms, frontal dunes, dune ridges, back dunes and other sand and gravel areas deposited by wave or wind action. Coastal sand dune systems may extend into coastal wetlands.
2. **Coastal wetlands.** "Coastal wetlands" means all tidal and subtidal lands; all areas with vegetation present that is tolerant of salt water and occurs primarily in a salt water or estuarine habitat; and any swamp, marsh, bog, beach, flat or other contiguous lowland that is subject to tidal action during the highest tide level for the year in which an activity is proposed as identified in tide tables published by the National Ocean Service. Coastal wetlands may include portions of coastal sand dunes.
3. **Forest management activities.** "Forest management activities" means timber stand improvement, timber harvesting, forest products harvesting and regeneration of forest stands.
4. **Freshwater wetlands.** "Freshwater wetlands" means freshwater swamps, marshes, bogs and similar areas that are:
 - A. Deleted. Laws 1995, ch. 460, § 1.¹
 - B. Inundated or saturated by surface or groundwater at a frequency and for a duration sufficient to support, and which under normal circumstances do support, a prevalence of wetland vegetation typically adapted for life in saturated soils; and
 - C. Not considered part of a great pond, coastal wetland, river, stream or brook.

These areas may contain small stream channels or inclusions of land that do not conform to the criteria of this subsection.
5. **Great ponds.** "Great ponds" means any inland bodies of water which in a natural state have a surface area in excess of 10 acres and any inland bodies of water artificially formed or increased which have a surface area in excess of 30 acres.

¹Repeal effective September 29, 1995.

6. **Normal high water line.** "Normal high water line" means that line along the shore of a great pond, river, stream, brook or other nontidal body of water which is apparent from visible markings, changes in the character of soils due to prolonged action of the water or from changes in vegetation and which distinguishes between predominantly aquatic and predominantly terrestrial land. In the case of great ponds, all land below the normal high water line shall be considered the bottom of the great pond for the purposes of this article.
7. **Permanent structure.** "Permanent structure" means any structure constructed or erected with a fixed location, or attached to a structure with a fixed location for a period exceeding 7 months each year, including, but not limited to, causeways, piers, docks, concrete slabs, piles, marinas, retaining walls and buildings.
8. **River, stream or brook.** "River, stream or brook" means a channel between defined banks. A channel is created by the action of surface water and has 2 or more of the following characteristics.
 - A. It is depicted as a solid or broken blue line on the most recent edition of the U.S. Geological Survey 7.5-minute series topographic map or, if that is not available, a 15-minute series topographic map.
 - B. It contains or is known to contain flowing water continuously for a period of at least 6 months of the year in most years.
 - C. The channel bed is primarily composed of mineral material such as sand and gravel, parent material or bedrock that has been deposited or scoured by water.
 - D. The channel contains aquatic animals such as fish, aquatic insects or mollusks in the water or, if no surface water is present, within the stream bed.
 - E. The channel contains aquatic vegetation and is essentially devoid of upland vegetation."River, stream or brook" does not mean a ditch or other drainage way constructed, or constructed and maintained, solely for the purpose of draining storm water or a grassy swale.
9. **Significant wildlife habitat.** "Significant wildlife habitat" means:
 - A. The following areas to the extent that they have been mapped by the Department of Inland Fisheries and Wildlife or are within any other protected natural resource: habitat, as defined by the Department of Inland Fisheries and Wildlife, for species appearing on the official state or federal list of endangered or threatened animal species; high and moderate value deer wintering areas and travel corridors as defined by the Department of Inland Fisheries and Wildlife; seabird nesting islands as defined by the Department of Inland Fisheries and Wildlife; and critical spawning and nursery areas for Atlantic salmon as defined by the Atlantic Salmon Commission; and
 - B. Except for solely forest management activities, for which "significant wildlife habitat" is as defined and mapped in accordance with section 480-I by the Department of Inland Fisheries and Wildlife, the following areas that are defined by the Department of

Inland Fisheries and Wildlife and are in conformance with criteria adopted by the Department of Environmental Protection or are within any other protected natural resource:

- (1) Significant vernal pool habitat;
- (2) High and moderate value waterfowl and wading bird habitat, including nesting and feeding areas; and
- (3) Shorebird nesting, feeding and staging areas.

DEPARTMENT OF ENVIRONMENTAL PROTECTION
NRPA PERMIT BY RULE NOTIFICATION FORM

(For use with DEP Regulation, Natural Resources Protection Act-Permit by Rule Standards, Chapter 305)

PLEASE TYPE OR PRINT IN **BLACK INK ONLY**

Name of Applicant: (owner)		Name of Agent:	
Applicant Mailing Address:		Agent Phone # (Include area code):	
Town/City:		PROJECT Information Name of Town/City:	
State and Zip code:		Name of Wetland or Waterbody:	
Daytime Phone # (Include area code):		Map #:	Lot #:
Detailed Directions to Site:			
		UTM Northing: (if known)	UTM Easting: (if known)
Description of Project:			
Part of a larger project? (check one)→	<input type="checkbox"/> Yes <input type="checkbox"/> No	After the Fact? (check one)→	<input type="checkbox"/> Yes <input type="checkbox"/> No
Check one→ This project <input type="checkbox"/> does (or) <input type="checkbox"/> does not involve work below mean low water (average low water).			

NRPA PERMIT BY RULE (PBR) SECTIONS: (Check at least one)

I am filing notice of my intent to carry out work which meets the requirements for Permit By Rule (PBR) under DEP Rules, Chapter 305. I and my agents, if any, **have read** and will comply with all of the standards in the Sections checked below.

- | | | |
|---|---|--|
| <input type="checkbox"/> Sec. (2) Act. Adj. to Protected Natural Res. | <input type="checkbox"/> Sec. (10) Stream Crossing | <input type="checkbox"/> Sec. (17) Transfers/Permit Extension |
| <input type="checkbox"/> Sec. (3) Intake Pipes | <input type="checkbox"/> Sec. (11) State Transportation Facil. | <input type="checkbox"/> Sec. (18) Maintenance Dredging |
| <input type="checkbox"/> Sec. (4) Replacement of Structures | <input type="checkbox"/> Sec. (12) Restoration of Natural Areas | <input type="checkbox"/> Sec. (19) Activities in/on/over significant vernal pool habitat |
| <input type="checkbox"/> Sec. (5) REPEALED | <input type="checkbox"/> Sec. (13) F&W Creation/Enhance/Water Quality Improvement | <input type="checkbox"/> Sec. (20) Activities located in/on/over high or moderate value inland water-fowl & wading bird habitat or shore-bird feeding & roosting areas |
| <input type="checkbox"/> Sec. (6) Movement of Rocks or Vegetation | <input type="checkbox"/> Sec. (14) REPEALED | |
| <input type="checkbox"/> Sec. (7) Outfall Pipes | <input type="checkbox"/> Sec. (15) Public Boat Ramps | |
| <input type="checkbox"/> Sec. (8) Shoreline stabilization | <input type="checkbox"/> Sec. (16) Coastal Sand Dune Projects | |
| <input type="checkbox"/> Sec. (9) Utility Crossing | | |

NOTIFICATION FORMS CANNOT BE ACCEPTED WITHOUT THE NECESSARY ATTACHMENTS:

- Attach** a check for the correct fee, payable to: "Treasurer, State of Maine". The current fee for NRPA PBR Notifications can be found at the Department's website: <http://www.maine.gov/dep/feesched.pdf>
- Attach** a U.S.G.S. topo map or Maine Atlas & Gazetteer map with the project site clearly marked.
- Attach** Proof of Legal Name if applicant is a corporation, LLC, or other legal entity. Provide a copy of Secretary of State's registration information (available at <http://icrs.informe.org/nei-sos-icrs/ICRS?MainPage=x>). Individuals and municipalities are **not** required to provide any proof of identity,
- Attach** photos of the proposed site where activity will take place as required in PBR Sections checked above.
- Attach** all other required submissions as outlined in the PBR Sections checked above.

I authorize staff of the Departments of Environmental Protection, Inland Fisheries & Wildlife, and Marine Resources to access the project site for the purpose of determining compliance with the rules. I also understand that **this permit is not valid until approved by the Department or 14 days after receipt by the Department, whichever is less.**

By signing this Notification Form, I represent that the project meets all applicability requirements and standards in the rule and that the applicant has sufficient title, right, or interest in the property where the activity takes place.

Signature of Agent or Applicant:		Date:	
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Keep a copy as a record of permit. Send the form with attachments via certified mail or hand deliver to the Maine Dept. of Environmental Protection at the appropriate regional office listed below. The DEP will send a copy to the Town Office as evidence of the DEP's receipt of notification. No further authorization by DEP will be issued after receipt of notice. Permits are valid for two years. **Work carried out in violation of any standard is subject to enforcement action.**

AUGUSTA DEP 17 STATE HOUSE STATION AUGUSTA, ME 04333-0017 (207)287-3901	PORTLAND DEP 312 CANCO ROAD PORTLAND, ME 04103 (207)822-6300	BANGOR DEP 106 HOGAN ROAD BANGOR, ME 04401 (207)941-4570	PRESQUE ISLE DEP 1235 CENTRAL DRIVE PRESQUE ISLE, ME 04769 (207)764-0477
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OFFICE USE ONLY	Ck.#	Date	Staff	Staff	
PBR #	FP		Acc. Date	Def. Date	After Photos



January 15, 2016
15426

Benjamin W. Guidi
Project Manager, Brownfields & VRAP
Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
Division of Remediation
17 State House Station
Augusta, ME 04333-0017

**RE: Voluntary Response Action Program
Former Burt Company Site and Adjacent Property, Cambridge & Cornell Streets, Portland, Maine**

Dear Mr. Guidi:

Sebago Technics, Inc. (STI) is pleased to present the Remedial Action Plan (RAP) in conjunction with the City of Portland and J.B. Brown and Son's Application for Assistance within the Maine Department of Environmental Protection (Maine DEP) Voluntary Response Action Program (VRAP) for two contiguous properties on Cambridge and Cornell Streets in Portland. Sebago Technics, Inc. (STI) is acting as environmental consultant on behalf of the City of Portland for these properties.

Background

Based on discussions with the applicants, the City of Portland proposed a land-swap with J.B. Brown & Sons, which will consolidate potentially exposed contaminated soils on a portion of the parcel the City of Portland wishes to retain. Currently, the existing former Burt Company Property (Tax Map 151 Lot A-13) contains areas of Arsenic and Lead contaminated soils above the "Excavation or Construction Worker" exposure scenario applicable Remedial Action Guideline (RAG) for the property (potential commercial redevelopment of the site). These areas include soils that are considered "accessible soil" as defined by the Maine DEP, which are located less than two feet below the ground surface and are not covered by pavement or a cover system. These areas include a small area at the end of the former Burt Company access driveway containing arsenic contaminated soils and a larger area of lead contaminated soils on the northeast corner of the site (see Figure 1-Areas of Remediation). Additionally, previous site investigations conducted in 2007 reveal soil samples exceeding RAGs for lead on the adjacent parcel (Tax Map 151A Lot A21), which is also included in this application. These soils are identified in the 0-2 depth below surface grade, and would be considered accessible soil, and therefore proposed to be mitigated.

Remedial Action Plan

It's the understanding of STI that the City of Portland proposes to remove any potentially accessible soil above Excavation or Construction Worker RAGs and relocate these soils to a portion of the parcel the City will retain following the land-swap. Specifically, the City of Portland proposes to remove Arsenic contaminated soils above RAGs that are considered accessible soil and relocate to the existing area containing Lead contaminated soils above RAGs, on the northeastern portion of the parcel. These Arsenic contaminated soils will be removed from a small area near the center of the former Burt Company parcel until RAGs are achieved, and will be relocated on an area of existing Lead contaminated accessible soils prior to being mitigated with the implementation of a cover system. Arsenic contaminated soils will be delineated in the field by an Environmental Professional screening excavated soils for the presence of Arsenic using a portable

x-ray Fluorescence (XRF) detector. The frequency of soil screening will be at the discretion of the Environmental Professional and will use Maine DEP Remediation Standard Operating Procedure DR#25 Protocol for Collecting Data Using an Innov-X Field Portable X-Ray Fluorescence Spectrometer for Certain Metals in Solid Media.

Following the removal and relocation of the Arsenic contaminated soils, the City intends to relocate soils over the existing Lead contaminated accessible soils, and backfill any excavated areas with a minimum of two feet of clean soil (cover system). The remaining area occupied by the Lead and Arsenic contaminated accessible soils will be mitigated with the implementation of a cover system constructed with a minimum of two feet of clean fill. This area will be designated with a marked layer prior to installation of the cover system and delineated on a plan sheet to be filed with VRAP documentation (Certificate of Completion) and Soil Management Plans. Remaining areas of the site will contain accessible soils with any remaining contamination below Maine DEP's RAGs.

This property will also be required to implement institutional/engineering controls which will be stated within the Declaration of Environmental Covenant ("Declaration") pursuant to the Uniform Environmental Covenants Act, 38 M.R.S.A. § 3001 et seq. These will likely include adherence to a Soils Management Plan, continued commercial use of the property, and no installation of groundwater extraction wells on the property without prior permission from the Department. This document, once approved by the Department, will be recorded in the Cumberland County Registry of Deeds.

Closure

This RAP has been completed following previous discussions with Maine DEP staff familiar with this property and with the similarly proposed RAP within this site's 2007 VRAP application. STI believes that, based on the prior approval of a similar RAP, completion of remedial efforts described herein, the continued commercial use of the property, and lack of nearby drinking water wells; this property does not pose a threat to public health, welfare, and the environment. STI is requesting the MDEP to issue a "No Action Assurance" letter stating that if the RAP is properly implemented, and any future soils are to be excavated/handled in accordance with a Soils Management Plan, the Department will assure the applicant that no enforcement action will be taken.

STI appreciates your timely review and comment on the enclosed application and recommendation. Should you have any questions, I am available at (207) 200-2052.

Sincerely,

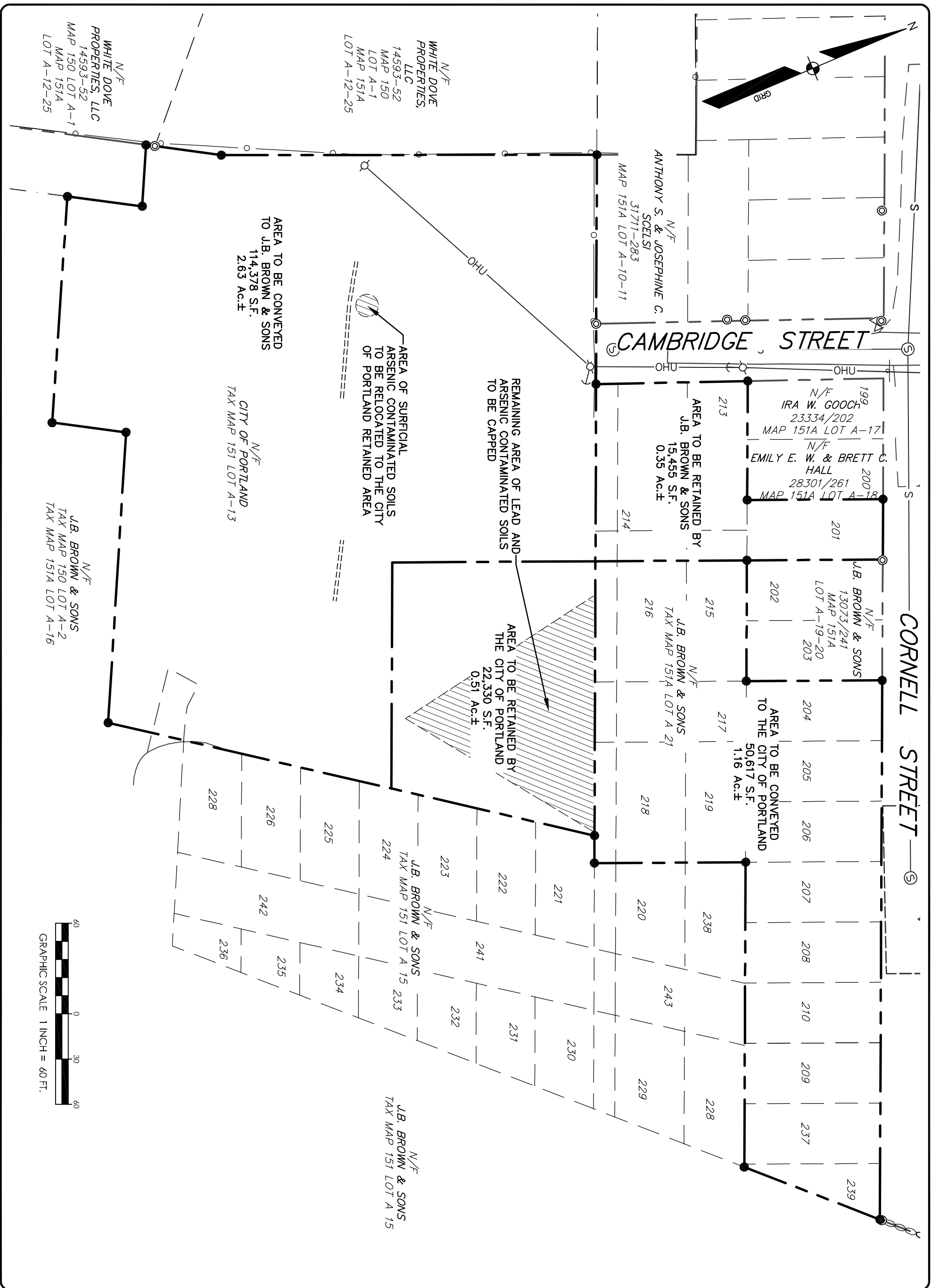
SEBAGO TECHNICS, INC.



Grant E. Austin
Environmental Scientist

GEA/Ilg
Enc., Figure 1-Areas of Remediation

cc: Greg Mitchell, City of Portland
Vincent Vereneau, J.B. Brown & Sons



DESIGNED	CHECKED
GEA	GEA
PROJECT NO.	SCALE
15426	1"=60'

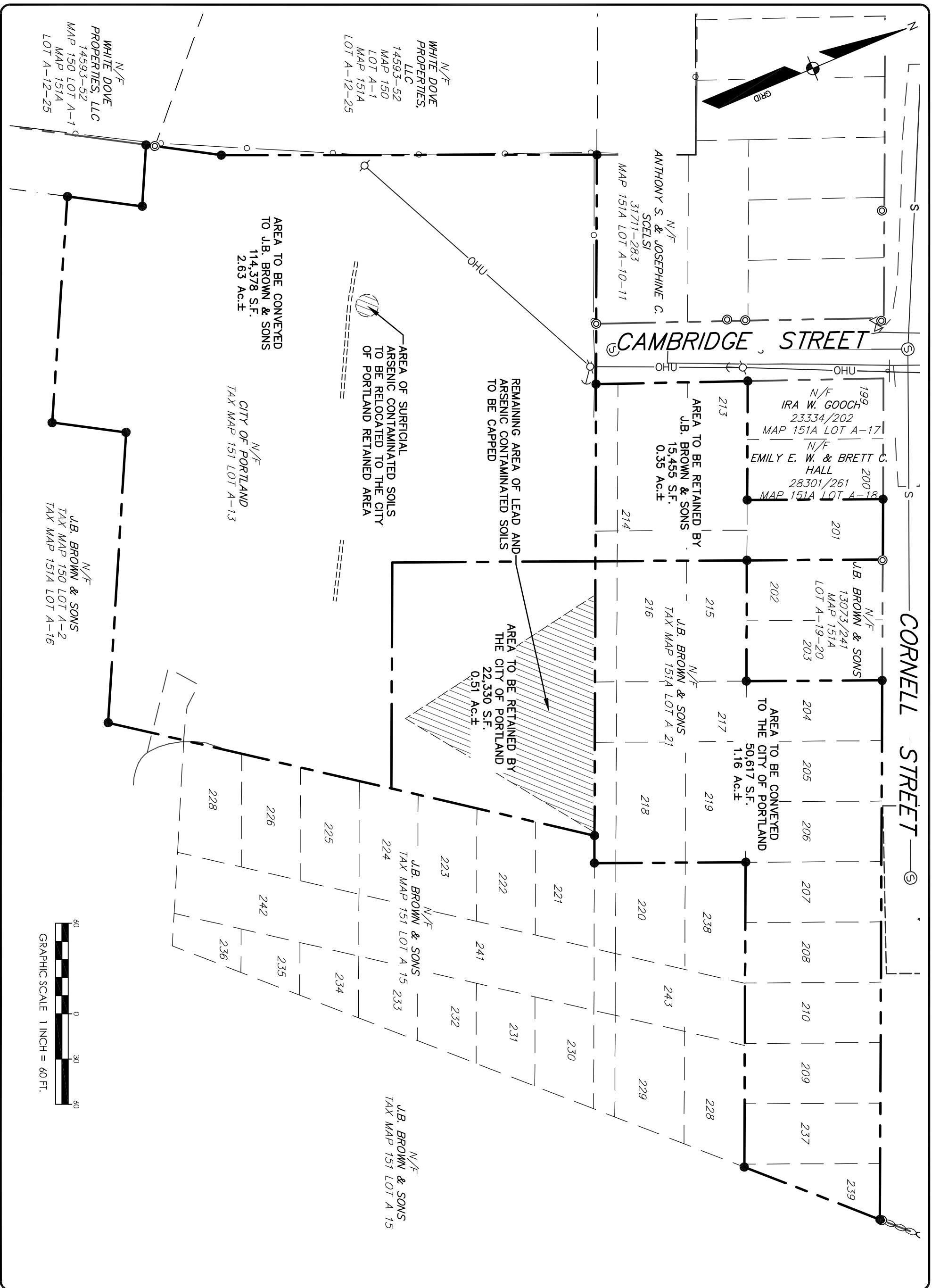
PROPOSED REMEDIAL ACTION PLAN
OF:
THE CITY OF PORTLAND MAINE
CAMBRIDGE STREET
PORTLAND, MAINE
FOR:
THE CITY OF PORTLAND MAINE
389 CONGRESS STREET
PORTLAND, MAINE 04101

SEBAGO
TECHNICS
WWW.SEBAGOTECHNICS.COM

75 John Roberts Rd.
Suite 1A
South Portland, ME 04106
Tel. 207-200-2100

250 Goddard Rd.
Suite B
Lewiston, ME 04240
Tel. 207-783-5656

THIS PLAN SHALL NOT BE MODIFIED WITHOUT WRITTEN PERMISSION FROM SEBAGO TECHNICS, INC. ANY ALTERATIONS, AUTHORIZED OR OTHERWISE, SHALL BE AT THE USER'S SOLE RISK AND WITHOUT LIABILITY TO SEBAGO TECHNICS, INC.



DESIGNED	CHECKED
GEA	GEA
PROJECT NO.	SCALE
15426	1"=60'

PROPOSED REMEDIAL ACTION PLAN
OF:
THE CITY OF PORTLAND MAINE
CAMBRIDGE STREET
PORTLAND, MAINE
FOR:
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Memorandum

To: Social Housing Taskforce

From: Jay Waterman

Date: 4-22-2026

Subject: Potential PHA/City of Portland Collaboration Toward Social Housing Goals

PHA Understanding of the Social Housing goals:

- Social Housing Taskforce (“Taskforce”) wants to create permanently affordable housing for those above 60% Area Median Income;
- While deeper targeting is a goal, higher incomes with a mix of incomes housing is preferred;
- Avoid LIHTC or MaineHousing funding in SH projects and not use City funding to support LIHTC projects (trying not to duplicate efforts)
- City of Portland ownership or partial ownership
- City of Portland resources ideally are “revolving” by a return on equity through cash flow.

What PHA offers

- A mission that has flexibility to meet broad housing goals and income levels, within certain non-profit bylaws and IRS limits
- Depth in housing development experience
- Focus on the City of Portland geographic area
- Ability to leverage many funding sources
- A Housing Authority network here in Maine and around the northeast (Cambridge) that can offer models and consulting services.
- Our development entity, Portland Housing Development Corp., can act as owner and developer. PHA can act as property manager.

Potential Pilot Project Scenarios

On Peninsula Congress Street Site

- Downtown in-fill project that could provide 54 one-bedroom units
- PHA optioned parcel, market acquisition price around \$1MM
- Currently planned as a 9% LIHTC submission to MaineHousing in September
- Going to the planning board in June, 2026



- Assumptions as a social housing test fit
 - Set all units to 80% AMI (with UAs) to maximize rental income while still being considered affordable
 - Removed all City- and MaineHousing-based soft costs (permits, land use fees, LIHTC fees, etc.)
 - Removed all City-based operating expenses (real estate taxes, rental registrations, stormwater fees)
 - Lowered Replacement Reserve (no MaineHousing requirement)
 - Removed Deferred Developer Fee (helps with owner cash flow)
 - Removed LIHTC equity
 - Removed gap sources (AHP, Efficiency Maine, HTF, etc. that have lower targeting)
 - Set debt as I/O loan at 4% rate
- Result:
 - 54 one-bedroom 80% AMI units at about \$1,800 rent per month (utilities not incl.)
 - Annual cash flow ~\$100k in YR1
 - \$15.7 million I/O loan
 - **\$5.8 million gap funding gap (see draft pro forma attached)**

21 Randall Street

- East Deering lot near PHA's Front Street rental and condo community
- City owned; Formerly under contract with Greater Portland Land Trust
- Potential for 8-12 unit townhouse-style homeownership or rental
- Pro forma based on our Front Street Phase 3 8-unit homeownership (w/ 10% cost increase)
- Funding from MaineHousing's Affordable Homeownership Program is pending
- Assumption as a social housing test fit
 - Clean soils/no brownfields funding
 - \$0 acquisition cost
 - Removed Congressional earmarks (next year possible)
 - City 75% TIF
 - 2BR unit at \$298,000 ; 3BR units (MKT) at \$552,000 ; 4BR units at \$358,000;
 - **Approx. \$1.3MM funding gap (see draft pro forma attached)**

Other Pilot Project Opportunities

- Midtown property (City owned)
- PHA redevelopment of Kennedy Park, Bayside East public housing in East Bayside
- PHA redevelopment of 115 Anderson Street maintenance facility
- PHA development of 165 Anderson Street lot

PROJECT & SITE INFORMATION

Info	
Project Name	Mixed-Use Development
Project Address	Congress Street
City, State, Zip	Portland, ME 04102
Project Type	New Construction
Population	
Area Median Income (100%)	129,800

DEVELOPMENT ASSUMPTIONS

	Yr 1-5	Yr 6-15	Yr 16-30
Rent Inflation	2.0%	2.0%	2.0%
Operating Expense Inflation	3.0%	3.0%	3.0%
Other Income Inflation	2.0%	2.0%	2.0%
Reserve Deposit Inflation	3.0%		
Debt Service Coverage Ratio	1.15		
Vacancy Rate	LIHTC Units: 5.0%	PBV Units: 5.0%	
	Market Units: 5.0%	Other Inc.: 5.0%	

CONSTRUCTION SCHEDULE

	# Mo.	# Days
Construction Duration	15 mo.	456 days
Duration per Quarter		114 days

OWNERSHIP ASSUMPTIONS

	LP	SLP	GP
Share of Ownership	99.99%	0.0%	0.01%
Cash Flow Split	10.0%	0.0%	90.0%

TIMING ASSUMPTIONS

	# Mo.	Date
Acq/CLC/Construction Start		11/1/27
25% Construction Completion		3/1/28
50% Construction Completion		7/1/28
75% Construction Completion		10/1/28
100% Construction Completion		2/1/29
Qualified Occupancy	2 mo. after 100%	4/1/29
PLC	5 mo. after 100%	7/1/29
8609/Stabilization	8 mo. after 100%	10/1/29
PIS - First Building		2/1/29
PIS - Last Building		2/1/29

ENTITIES

	Name
Owner	Owner
Developer	PHDC
Seller	879 Congress, LLC
Limited Partner	LP
Other Partner	Other

MAINEHOUSING INDEX CAP

	\$/Unit
New Construction	388,500
Rehabilitation	340,000
N/C & Rehab Blend	0

Unit Type	UNIT INFORMATION					RENTAL INCOME				
	# of BR	# of Units	LIHTC Unit	PBV Unit PBV	Income Limit (% AMI)	Max Gross LIHTC Rent	Less Utility Allowance	Max Contract LIHTC Rent	Proposed Contract Rent	Annual Rental Income
1BR @ 80% AMI	1	54	Y	N	80%	1,947	148	1,799	1,799	1,165,752
TOTAL	54	54	54	0						1,165,752

OPERATING SUBSIDY INCOME			
PBV Rent	Monthly PBV Diff. PUPM	Annual PBV Diff. Total	Total Annual Rent. + PBV Income
-	-	-	1,165,752
		0	1,165,752

OTHER INCOME	
Description	Yr 1
Laundry	1,500
TOTAL OTHER INCOME	1,500

UNIT INFO			
BR Size	U.A.	Mrkt. Study	PBV Rent
0 BR	0	0	1,615
1 BR	148	0	1,823
2 BR	0	0	2,343
3 BR	0	0	2,850
4 BR	0	0	3,102
5 BR	0	0	3,567
6 BR	0	0	4,032

EFFECTIVE GROSS INCOME	
Description	Yr 1
Rental Income: LIHTC Units	1,165,752
<i>Vac. Loss - LIHTC (5.0%)</i>	<i>(58,288)</i>
Rental Income: PBV Units	0
<i>Vac. Loss - PBV (5.0%)</i>	<i>0</i>
Rental Income: Market Units	0
<i>Vac. Loss - Market-Rate (5.0%)</i>	<i>0</i>
Other Income	1,500
<i>Vac. Loss - Other Inc. (5.0%)</i>	<i>(75)</i>
Tax Increment Financing	0
Commercial Income	0
EFFECTIVE GROSS INCOME	1,108,889

TAX INCREMENT FINANCING	
Description	Yr 1
0% TIF	0

UTILITIES			
Utility	Payee	Type	
Electricity	Owner		
Heat	Owner		
Hot Water	Owner		
Cooking	Owner		
Water/Sewer	Owner		
Trash	Owner		

COMMERCIAL INCOME	
Description	Yr 1
Commercial Spaces	
TOTAL COMMERCIAL INCOME	0

SQUARE FOOTAGE AND APPLICABLE FRACTION		
Description	Units	Sq. Ft.
LIHTC Units	54	33,750
Non-LIHTC Units	0	0
TOTAL UNITS	54	33,750

Applicable Fraction	By Units	By Sq.Ft.
by Calculation Method:	100%	100%
APPLICABLE FRACTION		100%

Residential Units Sq. Ft.	33,750
Residential Common Areas Sq. Ft.	9,984
Commercial Rental Sq. Ft.	1,500
Other Sq. Ft.	5,830
TOTAL PROJECT SQUARE FOOTAGE	51,064

Line Item	Total	Per Unit
ADMINISTRATIVE EXPENSES		
<i>Management Fees</i>	60,000	1,111
Office Salaries	30,000	
Supplies & Postage	500	
Bookkeeping Fees/Accounting	1,000	
Training	500	
Site Internet & Telephone	5,000	
<i>Management Charges</i>	37,000	685
Marketing	500	9
Legal	1,000	19
Auditing	7,500	139
Other Admin. Background Checks	250	5
Other Admin. IT Software & Computers	750	14
Other Admin. Interpreting	500	9
<i>Other Admin.</i>	10,500	194
Subtotal Administrative Expenses	144,500	2,676

Line Item	Total	Per Unit
UTILITY EXPENSES		
Natural Gas	4,000	74
Electricity	20,000	370
Water/Sewer	35,000	648
Other Utility		
Other Utility		0
Subtotal Utility Expenses	59,000	1,093

Line Item	Total	Per Unit
MAINTENANCE EXPENSES		
Janitorial Payroll	8,000	148
Janitorial Supplies and Equipment		0
Janitorial Contractual Services	4,000	74
Garbage and Trash Removal	12,000	222
Vehicle and Equipment		0
Grounds Maintenance Payroll		0
Grounds Tools and Supplies		0
Grounds Contractual Services	8,000	148
Miscellaneous Ground Maintenance		0
Building Maintenance Payroll	30,000	556
Building Tools and Supplies		0

Line Item	Total	Per Unit
GENERAL EXPENSES		
Property Taxes		0
Property and Liability Insurance	60,000	1,111
Other Financial Expenses		0
Resident Services		0
Other General Rental Registration		0
Other General		
Other General		
Other General		0
Subtotal General Expenses	60,000	1,111

HOUSING OPEX	365,500	6,769
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Line Item	Total	Per Unit
COMMERCIAL EXPENSES		
Admin Expenses		0
Operating Expenses		0
Maintenance Expenses		0
General Expenses		0
Other Comm.		0
Subtotal Commercial Expenses	0	0

TOTAL OPEX	365,500	6,769
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Line Item	Total	Per Unit
RESERVE CONTRIBUTIONS		
Replacement Reserve	21,600	400
Other Reserve	0	

TOTAL OPEX + RESERVES	387,100	7,169
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Line Item	Total	Per Unit	LIHTC Basis			T-E Bonds	HTC Basis			
			NC/R Basis	Acq Basis	Non-Deprec.	50% Test	QRE	Non-QRE	Allocable	
CONSTRUCTION COSTS										
Off-Site Improvements	0	0	0	0	0	0	0	0	0	0
Site Improvements	0	0	0	0	0	0	0	0	0	0
Construction: Residential	15,500,000	287,037	15,500,000	0	0	15,500,000	11,625,000	3,875,000	0	0
Construction: Commercial	375,000	6,944	0	0	375,000	375,000	375,000	0	0	0
Demolition	50,000	926	49,074	0	926	50,000	0	50,000	0	0
General Conditions	0	0	0	0	0	0	0	0	0	0
P&P Bond Premium	0	0	0	0	0	0	0	0	0	0
Builder Overhead & Profit	0	0	0	0	0	0	0	0	0	0
Other:	0	0	0	0	0	0	0	0	0	0
Other:	0	0	0	0	0	0	0	0	0	0
Other:	0	0	0	0	0	0	0	0	0	0
Other:	0	0	0	0	0	0	0	0	0	0
Construction Contingency	796,250	14,745	597,188	0	199,063	796,250	796,250	0	0	0
Subtotal Construction Costs	16,721,250	309,653	16,146,262	0	574,988	16,721,250	12,796,250	3,925,000	0	0
SOFT COSTS										
Building Permits & Fees	45,250	838	45,250	0	0	45,250	45,250	0	0	0
Survey & Engineering	76,500	1,417	76,500	0	0	76,500	76,500	0	0	0
Architectural & Design	616,500	11,417	616,500	0	0	616,500	616,500	0	0	0
Legal	50,000	926	45,000	0	5,000	50,000	45,000	5,000	0	0
Title & Recording	32,000	593	32,000	0	0	32,000	0	32,000	0	0
Accounting	10,000	185	10,000	0	0	10,000	10,000	0	0	0
Construction Period Tax	5,000	93	0	5,000	0	5,000	0	5,000	0	0
Insurance	160,000	2,963	160,000	0	0	160,000	157,500	2,500	0	0
Soft Cost Contingency	60,000	1,111	60,000	0	0	60,000	60,000	0	0	0
Subtotal Soft Costs	1,055,250	19,542	1,045,250	5,000	5,000	1,055,250	1,010,750	44,500	0	0
FINANCING COSTS										
CL Interest	750,000	13,889	562,500	0	187,500	750,000	562,500	187,500	0	0
CL Origination Fee	15,000	278	15,000	0	0	15,000	15,000	0	0	0
Lender Inspections	0	0	0	0	0	0	0	0	0	0
Bond Issuance Fee	0	0	0	0	0	0	0	0	0	0
City Perf. Guarantee LOC Fee	5,000	93	5,000	0	0	5,000	5,000	0	0	0
Other Construction Loan Costs	0	0	0	0	0	0	0	0	0	0
MSHA Perm Loan Fees	0	0	0	0	0	0	0	0	0	0
Perm Lender Application Fees	0	0	0	0	0	0	0	0	0	0
Perm Lender Origination Fees	274,594	5,085	274,594	0	0	274,594	0	274,594	0	0
Other Perm Loan Costs	0	0	0	0	0	0	0	0	0	0
Subtotal Financing Costs	1,044,594	19,344	857,094	0	187,500	1,044,594	582,500	462,094	0	0

Line Item	Total	Per Unit	LIHTC Basis			T-E Bonds	HTC Basis			
			NC/R Basis	Acq Basis	Non-Deprec.	50% Test	QRE	Non-QRE	Allocable	
MISCELLANEOUS COSTS										
Market Study	3,000	56	3,000	0	0	0	0	3,000	0	
Appraisal	5,000	93	5,000	0	0	0	5,000	0	0	
Environmental	12,500	231	12,500	0	0	12,500	12,500	0	0	
LIHTC Fees	0	0	0	0	0	0	0	0	0	
Syndication Expenses	0	0	0	0	0	0	0	0	0	
Relocation	0	0	0	0	0	0	0	0	0	
FF&E	100,000	1,852	100,000	0	0	100,000	0	100,000	0	
Other Misc Costs	8,000	148	0	0	8,000	8,000	0	8,000	0	
Subtotal Miscellaneous Costs	128,500	2,380	120,500	0	8,000	120,500	17,500	111,000	0	
ACQUISITION COSTS										
Building	0	0	0	0	0	0	0	0	0	
Land	1,000,000	18,519	0	0	1,000,000	0	0	1,000,000	0	
Repay Existing Mortgage Balance	0	0	0	0	0	0	0	0	0	
Other Acquisition Costs	0	0	0	0	0	0	0	0	0	
Subtotal Acquisition Costs	1,000,000	18,519	0	0	1,000,000	0	0	1,000,000	0	
RESERVES										
Operating Deficit Escrow (ODE)	507,371	9,396	0	0	507,371	0	0	507,371	0	
Replacement Reserve (RR)	159,250	2,949	0	0	159,250	0	0	159,250	0	
Tax & Insurance Reserve (T&I)	70,000	1,296	0	0	70,000	0	0	70,000	0	
Rent Up & Marketing / Working Capital	50,000	926	0	0	50,000	0	0	50,000	0	
Other	0	0	0	0	0	0	0	0	0	
Subtotal Reserves	786,621	14,567	0	0	786,621	0	0	786,621	0	
DEVELOPMENT FEES										
Subtotal Development Overhead & Fees	750,000	13,889	750,000	0	0	750,000	750,000	0	0	
TOTAL DEVELOPMENT COSTS	21,486,215	397,893	18,919,105	5,000	2,562,110	0	0	0	0	
MAINEHOUSING TDC INDEX		381,553								

Equity Source	Program Used?	Credit Rate	Annual Allocation	Total Credits	Equity Price	Total Equity
LIHTC New Construction/Rehab Credits	Y	9.00%	1,200,000	12,000,000	0.00	0
LIHTC Acquisition Credits	N	4.00%		0	0.00	0
Subtotal LIHTC Equity			1,200,000	12,000,000		0
Federal Historic Tax Credits	N	20.00%		0	0.00	0
State Historic Tax Credits	N	25.00%		0	0.00	0
State Low Income Tax Credits	Y			0	1.00	0
Solar Investment Tax Credits	Y	50.00%		0	1.00	0
TOTAL LIMITED PARTNER EQUITY				12,000,000	0.00	0

MAX LIHTC NEW CONSTRUCTION/REHAB CREDITS

Eligible Basis	18,919,105
Adjustment (i.e. HTC)	0
Adjusted Elible Basis	18,919,105
Basis Boost	100%
Applicable Fraction	100%
Qualified Basis	18,919,105
Applicable Rate	9.00%
1) NC/REHAB CREDIT CALC - or -	1,702,719
2) MAX ALLOWABLE 9% ALLOCATION - or -	1,200,000
3) AWARDED 9% ALLOCATION	0
ANNUAL NC/REHAB ALLOCATION	1,200,000
x 10 Years	10
TOTAL POSSIBLE NC/REHAB CREDITS	12,000,000
<i>Approx. Excess Basis</i>	<i>5,027,195</i>

MAX LIHTC ACQUISITION CREDITS

Eligible Basis	0
Applicable Fraction	100%
Qualified Basis	0
Applicable Rate	4.00%
ANNUAL ACQ ALLOCATION	0

FEDERAL HISTORIC TAX CREDITS

Qualified Rehab Expenditures	0
HTC Rate	20.0%
TOTAL FEDERAL HTC	0

STATE HISTORIC TAX CREDITS

Qualified Rehab Expenditures	0
HTC Rate	25.0%
1) STATE HTC CALC - or -	0
2) MAX ALLOWABLE STATE HTC	5,000,000
TOTAL STATE HTC	0

SOLAR INVESTMENT TAX CREDIT

Solar Investment	0
Credit Rate	50%
TOTAL STATE HTC	0

FINANCING

Source	Amount	Rate	Term	Amort.	Lien	Loan Type	Repayment Type	Annual Payment
MH Subsidy		0.00%	30	0		No Interest	CF Contingent	0
MH Interest-Only Loan	15,691,074	4.00%	30	30		Interest-Only	Must-Pay	627,643
Multifamily Loan		4.00%	10	30		Amortizing	Must-Pay	0
Commercial Loan		6.50%	10	25		Amortizing	Must-Pay	0
City HTF		0.00%	30	0		No Interest	CF Contingent	0
AHP Subsidized Advance		6.00%	20	30		Amortizing	Must-Pay	0
AHP Direct Subsidy		0.00%	30	0		No Interest	CF Contingent	0
Efficiency Maine								0
Deferred Developer Fee		0.00%	10	10		Amortizing	CF Contingent	0
								0
								0
								0
Total Financing	15,691,074							627,643

EQUITY

Source	Amount	Yield
LIHTC Equity	0	0.00
Fed HTC Equity	0	0.00
State HTC Equity	0	0.00
State LIHTC Equity	0	0.00
Solar Investment Tax Credits	0	0.00
PHDC Equity		
Other Equity	5,795,141	
Total Equity	5,795,141	

SOURCES & USES

	Total	Per Unit
Total Sources	21,486,215	397,893
Total Uses	21,486,215	397,893
CAPITALIZATION (GAP) / SURPLUS	(0)	(0)

Cash Flow - Mixed-Use Development

		6 Mo.															
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
% Infl.		2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
INCOME																	
Rental Income: LIHTC Units	2.0%	582,876	1,189,067	1,212,848	1,237,105	1,261,847	1,287,084	1,312,826	1,339,083	1,365,864	1,393,182	1,421,045	1,449,466	1,478,455	1,508,025	1,538,185	1,568,949
Vacancy Loss - LIHTC Units	5.0%	(29,144)	(59,453)	(60,642)	(61,855)	(63,092)	(64,354)	(65,641)	(66,954)	(68,293)	(69,659)	(71,052)	(72,473)	(73,923)	(75,401)	(76,909)	(78,447)
Rental Income: PBV Units	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vacancy Loss - PBV Units	5.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rental Income: Market Units	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vacancy Loss - Market Units	5.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Income	2.0%	750	1,530	1,561	1,592	1,624	1,656	1,689	1,723	1,757	1,793	1,828	1,865	1,902	1,940	1,979	2,019
Vacancy Loss - Other Income	5.0%	(38)	(77)	(78)	(80)	(81)	(83)	(84)	(86)	(88)	(90)	(91)	(93)	(95)	(97)	(99)	(101)
Tax Increment Financing	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial Income	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EFFECTIVE GROSS INCOME		554,445	1,131,067	1,153,689	1,176,762	1,200,298	1,224,303	1,248,790	1,273,765	1,299,241	1,325,225	1,351,730	1,378,765	1,406,340	1,434,467	1,463,156	1,492,419
OPERATING EXPENSES																	
Administrative Expenses	3.0%	72,250	148,835	153,300	157,899	162,636	167,515	172,541	177,717	183,048	188,540	194,196	200,022	206,022	212,203	218,569	225,126
Utility Expenses	3.0%	29,500	60,770	62,593	64,471	66,405	68,397	70,449	72,563	74,739	76,982	79,291	81,670	84,120	86,643	89,243	91,920
Maintenance Expenses	3.0%	51,000	105,060	108,212	111,458	114,802	118,246	121,793	125,447	129,211	133,087	137,079	141,192	145,428	149,790	154,284	158,913
General Expenses	3.0%	30,000	61,800	63,654	65,564	67,531	69,556	71,643	73,792	76,006	78,286	80,635	83,054	85,546	88,112	90,755	93,478
Commercial Expenses	3.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL OPEX	3.0%	182,750	376,465	387,759	399,392	411,373	423,715	436,426	449,519	463,004	476,895	491,201	505,937	521,116	536,749	552,852	569,437
NET OPERATING INCOME		371,695	754,602	765,930	777,371	788,924	800,589	812,363	824,246	836,236	848,331	860,529	872,827	885,224	897,718	910,304	922,982
RESERVE DEPOSITS																	
Deposit to Replacement Reserve	3.0%	10,800	22,248	22,915	23,603	24,311	25,040	25,792	26,565	27,362	28,183	29,029	29,899	30,796	31,720	32,672	33,652
Deposit to Other Reserve	3.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL OPEX + RESERVES		193,550	398,713	410,674	422,995	435,684	448,755	462,218	476,084	490,367	505,078	520,230	535,837	551,912	568,469	585,523	603,089
NOI AFTER RESERVES		360,895	732,354	743,014	753,768	764,613	775,549	786,572	797,681	808,874	820,148	831,500	842,928	854,428	865,997	877,633	889,330
DEBT SERVICE																	
MH Subsidy		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MH Interest-Only Loan		313,821	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643
Multifamily Loan		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial Loan		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City HTF		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AHP Subsidized Advance		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AHP Direct Subsidy		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Efficiency Maine		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Deferred Developer Fee		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL DEBT SERVICE		313,821	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643
DSCR		1.15	1.17	1.18	1.20	1.22	1.24	1.25	1.27	1.29	1.31	1.32	1.34	1.36	1.38	1.40	1.42
NET CASH FLOW		47,073	104,711	115,371	126,125	136,970	147,906	158,929	170,038	181,231	192,505	203,857	215,285	226,785	238,354	249,990	261,687
CASH FLOW PER UNIT		872	1,939	2,137	2,336	2,536	2,739	2,943	3,149	3,356	3,565	3,775	3,987	4,200	4,414	4,629	4,846
Rent & Income Inflation		-5,795,141.00	104,711.23	115,371.19	126,124.72	136,970.13	147,905.55	158,928.97	170,038.23	181,231.01	192,504.83	203,857.00	215,284.70	226,784.89	238,354.32	249,989.57	261,686.99
Yr 1-5: 2.0%																	
Yr 6-15: 2.0%		2%															
Yr 16-30: 2.0%																	

	% Infl.	16 2045	17 2046	18 2047	19 2048	20 2049	21 2050	22 2051	23 2052	24 2053	25 2054	26 2055	27 2056	28 2057	29 2058	30 2059
INCOME																
Rental Income: LIHTC Units	2.0%	1,600,328	1,632,334	1,664,981	1,698,281	1,732,246	1,766,891	1,802,229	1,838,273	1,875,039	1,912,540	1,950,791	1,989,806	2,029,602	2,070,194	2,111,598
<i>Vacancy Loss - LIHTC Units</i>	5.0%	(80,016)	(81,617)	(83,249)	(84,914)	(86,612)	(88,345)	(90,111)	(91,914)	(93,752)	(95,627)	(97,540)	(99,490)	(101,480)	(103,510)	(105,580)
Rental Income: PBV Units	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Vacancy Loss - PBV Units</i>	5.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rental Income: Market Units	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Vacancy Loss - Market Units</i>	5.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Income	2.0%	2,059	2,100	2,142	2,185	2,229	2,273	2,319	2,365	2,413	2,461	2,510	2,560	2,612	2,664	2,717
<i>Vacancy Loss - Other Income</i>	5.0%	(103)	(105)	(107)	(109)	(111)	(114)	(116)	(118)	(121)	(123)	(126)	(128)	(131)	(133)	(136)
Tax Increment Financing	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial Income	2.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EFFECTIVE GROSS INCOME		1,522,268	1,552,713	1,583,767	1,615,442	1,647,751	1,680,706	1,714,320	1,748,607	1,783,579	1,819,251	1,855,636	1,892,748	1,930,603	1,969,215	2,008,600

OPERATING EXPENSES																
Administrative Expenses	3.0%	231,880	238,836	246,002	253,382	260,983	268,813	276,877	285,183	293,739	302,551	311,627	320,976	330,606	340,524	350,739
Utility Expenses	3.0%	94,678	97,518	100,444	103,457	106,561	109,757	113,050	116,442	119,935	123,533	127,239	131,056	134,988	139,037	143,208
Maintenance Expenses	3.0%	163,680	168,590	173,648	178,858	184,223	189,750	195,443	201,306	207,345	213,565	219,972	226,571	233,369	240,370	247,581
General Expenses	3.0%	96,282	99,171	102,146	105,210	108,367	111,618	114,966	118,415	121,968	125,627	129,395	133,277	137,276	141,394	145,636
Commercial Expenses	3.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL OPEX	3.0%	586,520	604,116	622,239	640,906	660,134	679,938	700,336	721,346	742,986	765,276	788,234	811,881	836,238	861,325	887,164

NET OPERATING INCOME		935,747	948,597	961,528	974,536	987,618	1,000,769	1,013,985	1,027,261	1,040,593	1,053,975	1,067,402	1,080,867	1,094,366	1,107,891	1,121,435
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RESERVE DEPOSITS																
Deposit to Replacement Reserve	3.0%	34,662	35,702	36,773	37,876	39,012	40,182	41,388	42,629	43,908	45,226	46,582	47,980	49,419	50,902	52,429
Deposit to Other Reserve	3.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL OPEX + RESERVES		621,182	639,817	659,012	678,782	699,146	720,120	741,724	763,975	786,895	810,501	834,816	859,861	885,657	912,227	939,593

NOI AFTER RESERVES		901,086	912,896	924,755	936,660	948,606	960,586	972,597	984,632	996,684	1,008,749	1,020,819	1,032,887	1,044,946	1,056,989	1,069,006
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DEBT SERVICE																
MH Subsidy		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MH Interest-Only Loan		627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643
Multifamily Loan		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial Loan		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City HTF		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AHP Subsidized Advance		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AHP Direct Subsidy		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Efficiency Maine		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Deferred Developer Fee		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL DEBT SERVICE		627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643	627,643

DSCR		1.44	1.45	1.47	1.49	1.51	1.53	1.55	1.57	1.59	1.61	1.63	1.65	1.66	1.68	1.70
NET CASH FLOW		273,443	285,253	297,112	309,017	320,963	332,943	344,954	356,989	369,041	381,106	393,176	405,244	417,304	429,346	441,363
CASH FLOW PER UNIT		5,064	5,282	5,502	5,723	5,944	6,166	6,388	6,611	6,834	7,058	7,281	7,505	7,728	7,951	8,173

Rent & Income Inflation		273,442.70	285,252.59	297,112.33	309,017.32	320,962.70	332,943.36	344,953.88	356,988.58	369,041.46	381,106.20	393,176.17	405,244.39	417,303.53	429,345.89	441,363.40
Yr 1-5: 2.0%																
Yr 6-15: 2.0%																
Yr 16-30: 2.0%																

21 Randall Homeownership (Template Pro Forma)

USES	TOTAL	PER UNIT
Site Improvements	\$ 582,836.09	\$ 72,854.51
Construction	\$ 2,911,911.13	\$ 363,988.89
Construction Contingency (10%)	\$ 445,580.27	\$ 55,697.53
Acquisition Costs	\$ -	\$ -
Building Permits & Fees	\$ 110,700.00	\$ 13,837.50
Survey & Engineering	\$ 113,000.00	\$ 14,125.00
Architectural & Design	\$ 75,000.00	\$ 9,375.00
Legal	\$ 150,000.00	\$ 18,750.00
Title, Recording, Transfer	\$ 30,000.00	\$ 3,750.00
Construction Period Tax & Insurance	\$ 47,500.00	\$ 5,937.50
Financing Fees (AHTIF, Origination, Appraisal)	\$ 15,000.00	\$ 1,875.00
Construction Loan Interest	\$ 96,268.00	\$ 12,033.50
AHTIF Reserve	\$ 75,000.00	\$ 9,375.00
Warranty Reserve	\$ 50,000.00	\$ 6,250.00
Consultants & Miscellaneous	\$ 13,600.00	\$ 1,700.00
Soft Cost Contingency	\$ 60,352.21	\$ 7,544.03
Developer Fee	\$ 250,000.00	\$ 31,250.00
<i>Total Hard Costs</i>	\$ 3,940,327.49	\$ 492,540.94
<i>Total Soft Costs</i>	<i>\$ 1,207,044.21</i>	<i>\$ 150,880.53</i>
Total Development Costs	\$ 5,147,371.70	\$ 643,421.46

SOURCES	TOTAL	PER UNIT
Affordable Unit Sales (2 bed units)	\$ 1,194,000.00	\$ 298,500.00
Affordable Unit Sales (4 bed units)	\$ 716,000.00	\$ 358,000.00
Market Rate Unit Sales (3 bed units)	\$ 1,105,600.00	\$ 552,800.00
MaineHousing Homeownership Program	\$ 468,747.00	\$ 78,124.50
AHTIF Loan	\$ 370,000.00	\$ 46,250.00
	\$ -	\$ -
	\$ -	\$ -

Total Sources	\$ 3,854,347.00	\$ 481,793.38
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SURPLUS/(GAP)	\$ (1,293,024.70)	\$ (161,628.09)
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Flow of Funds at Completion/Sale Closings

Construction Sources		
Construction Loan	2,495,600	83%
AHTIF Loan	370,000	
MH AHOP Grant	468,747	
CDS	0	
EPA Brownfields Grant	0	
Sponsor Equity - Seller Note	270,000	
Sponsor Equity - DDF	250,000	
Sponsor Equity - Other	1,293,025	
Total	5,147,372	
Gross Sale Proceeds	3,015,600	
Less Broker Fees & Closing Costs	0	
Net Proceeds	3,015,600	
Use of Sale Proceeds		
Repay Construction Loan	-2,495,600	
Pay Seller Loan	-270,000	
Pay DDF	-250,000	
Repay Sponsor Capital	-1,293,025	
Net Proceeds Available to Sponsor	-1,293,025	

AHTIF Loan Sizing

Total Sales Value	\$	3,015,600
Projected Assessed Value	\$	2,714,040
Current Assessed Value	\$	69,300
Incremental Value "Captured Value"	\$	2,644,740
Applicable Tax Rate	\$	15.01
Projected Tax Rate at Reassessment	\$	15.92
Year 1 Incremental Tax Revenue	\$	42,115
AHTIF Share		75.00%
Projected AHTIF Loan Cash Flow	\$	30,000
AHTIF Loan Rate		6.50%
Amortization Period		27
Supportable Loan Amount		\$377,249.93
Rounddown		\$370,000.00

Assumptions

Clean soil & no brownfields funding

\$0 acquisition costs

Same unit mix as FS3 (8 units)

10% increase in hard costs

2.5% inflation contingency

10% construction contingency

5% soft cost contingency

removed Brownfields funding

removed Congressional funding

Assumed AHTIF remained the same as FS3

Assumed MSHA AHOP remained the same as FS3

Assumed home sale prices remained steady

Approx \$160K / Unit funding gap