

**COMMUNITY RELATIONS PLAN
KVCOG REVOLVING LOAN FUND**

HARTLAND ANNEX REDEVELOPMENT, LLC

**IRVING TANNERY ANNEX – PARCEL 1 MAP 7, LOT 35-1
HARTLAND, MAINE**

JULY 14, 2016

1.0 OVERVIEW

In June 2016, the Hartland Annex Redevelopment, LLC (HAR) was awarded one Brownfields Cleanup Grant (grant) through the USEPA Brownfields Revolving Loan Fund Subgrant program from the Kennebec Valley Council of Governments (KVCOG) for cleanup of asbestos impacted building materials within the buildings located at the Irving Tannery Annex – Parcel 1 located at 154 Pleasant Street (Site) in Hartland, Maine. Grant funds will be used to reduce threats to human health and the environment primarily by removing the asbestos and other hazardous materials present within the building.

In accordance with the Cooperative Agreement between HAR and KVCOG, HAR is required to prepare a Community Relations Plan that outlines HAR's plan for involving the public during the cleanup process.

The purpose of the Community Relations Plan (CRP) is to describe HAR's strategy to address the needs and concerns of Hartland residents potentially affected by the proposed removal of environmental contamination present at the former Irving Tannery Annex building Site. The CRP outlines how HAR has involved, and will continue to involve, affected residents, municipal officials and local organizations in the decision-making process regarding the environmental cleanup at the Site.

Active residents and institutions involved in neighborhood issues are essential resources for the success of the CRP because they have a comprehensive understanding of the Hartland area as they hold positions of responsibility within the community. HAR perceives these citizens as key points of contact and communication within the neighborhood. The success of the environmental cleanup and subsequent redevelopment of the property hinges on informed citizen involvement in each step of the process.

2.0 SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is Mr. Chris Littlefield. He can be contacted at:

21 Academy Street
Hartland, Maine 04943
207-938-4401
hartlandmanager@gmail.com

The Information Repository is also located at the Town of Hartland office located at 21 Academy Street, Hartland, Maine. All public meetings will be held at the Irving Tannery Community Center (ITCC) unless otherwise advertised. Select documents prepared as part of this project (Analysis of Brownfields Cleanup Alternatives [ABCA], Phase I Environmental Site Assessment [ESA], Phase I ESA Update, Phase II ESA, and Maine Department of Environmental Protection [MEDEP] Uncontrolled Sites Program (USP) documentation) will be kept at the Town office for review.

3.0 SITE DESCRIPTION

This section provides the historical, geographical, and technical details necessary to show why the Site is being cleaned up by HAR.

3.1 Site Location

The Site is located at 154 Pleasant Street in Hartland, Maine and is shown on the Town of Hartland Tax Map 7 as Lot 35-1.

3.2 History of Site Use and Ownership

Previous investigations stated the canning facility was constructed in 1913; however, they did not reference the source of this information. Historic records reviewed indicate the oldest buildings assumed to be the original H.C. Baxter/Snowflake cannery structures constructed prior to 1917; those are the farthest east and closest to the former railroad tracks. In 1923 in an effort to expand their business the company began to can peas, string beans, and whole kernel corn, with this operation centered in Hartland, Maine. Over the years H.C. Baxter continued to expand its products including frozen vegetables and French fries. By the late 1950s and early 1960s, the company could no longer compete with canneries in other areas of the country and concentrated on processing potatoes. After the Hartland plant ceased operations in the late 1960s, it was acquired by Irving Tanning in 1963 and became known as the Tannery Annex. Leather finishing processes were conducted at the subject property, which utilized an assortment of pigments, lacquers, and solvents for spray and dipping applications. The tannery ceased using the building in 2012.

The Site is currently inactive. Presently, Tasman Leather Group, LLC (Tasman) utilizes the western section of the main building for dry, cold storage of blue stock. There is no electrical service or heat in any of the buildings. Vandalism has occurred as a result of its abandoned status. Various equipment and copper electrical wires were stolen for their resale potential. As a result of the electrical wire removal, electrical service cannot be restored without significant repair costs.

3.3 Nature of Threat to Public Health and the Environment

A Phase II Environmental Site Assessment and a Hazardous Building Materials Inventory were completed as a Brownfields Assessment completed by MAI Environmental (MAI) at the request

of the MEDEP in 2015. Additionally, Phase I ESA and a Phase I ESA Update were completed by CES, Inc. at the request of the Town of Hartland in 2015 and 2016. During these investigations Asbestos Containing Materials (ACM) were found in building components. Lead based paint was also determined to be present.

3.4 Reuse of the Site

Once the site is remediated, Mr. Cal Warner (Cal's Way LLC) could quickly open up a metal fabrication shop. Mr. Warner founded a metal fabrication company in Connecticut, which currently has a ten-year backlog of orders. He retired from that company, but it has repeatedly asked him to take on some of their overflow, and he believes they can provide enough work to keep a shop of this nature in business for the immediate future. Doing so would require five or six full time employees, immediately. He has no plans to solicit business in Maine. He believes, however, that there is significant unmet demand from Maine firms for custom metal work, and suspects that with time local orders would come in as well, leading to a need to employ more metalworkers. The economic activity generated by those workers, and the property tax receipts the town would receive upon the reintegration of the facility onto the tax rolls, would provide a substantial boon to Hartland, even if nothing else comes of the project. However, it is Mr. Warner's hope and expectation that more will come of the project. The approximately 60,000 square feet of the facility he does not propose to directly use would make an excellent maker's space, allowing local metalworkers, wood workers and similar skilled fabricators to rent small shops with excellent shared facilities. Doing so would allow them to kick start their own businesses and bring still more economic opportunities to Hartland. In the long run, if there is enough demand for additional space, the site would offer opportunities to build more buildings to suit particular tenants, creating a hub of skilled manufacturers in a single, centralized location and providing tax revenues for Hartland, quality jobs and job training for its residents, and contributing to the region's economic development efforts.

4.0 COMMUNITY BACKGROUND

This section will describe the community and its involvement with the Site.

4.1 Community Profile

The Site is located at 154 Pleasant Street.

The Town of Hartland is located at the foot of Great Moose Lake, the source of the west branch of the Sebasticook River. At the time of the Town's incorporation in 1820, there were two centers of population West Hartland and North Hartland. These settlements remained well-populated even as late as 1860. Although the Town was noted for its timber harvesting activity, parallel growth of agricultural and industrial interests occurred between 1800 and 1850. During this this period two saw mills were in North Hartland and West Hartland. Tanneries began to appear and prosper, one established by Hiram and Thomas Dorman in 1828 operated until the late 1800s, while another was started by Josiah Billings in 1852 was operated until 1887.

In addition to the tanneries, in the late 1800s the Town also had a woolen mill that manufactured shawls, a carding factory, a grist mill, two lumber mills a furniture factory, a door, sash, and blind factory and a carriage factory. These manufacturers eventually disappeared taking with them, what at the time were stable, high paying manufacturing jobs and leaving behind vacant structures and unemployed community members.

Due to the relatively small size of the targeted community, data are not available specifically for the corridor, however, it can be surmised that due to the lack of economic opportunities available to area residents, conditions in the corridor are similar or worse.

	Hartland	Somerset County	Maine	National
Population:	1,782	51,910	1,328,361	308,745,538 ¹
Unemployment:	7.7%	6.1%	5.8%	6.7% ²
Poverty Rate:	17.0%	14.9%	13.3%	11.8% ³
Percent Minority:	5.2%	3.4%	4.8%	26.7% ¹
Median Household Income:	\$34,083	\$30,731	\$48,219	\$51,371 ³
Median Housing Value	\$79,221	\$110,018	\$172,100	\$185,400

4.2 Chronology of Community Involvement

The HAR and the Town have actively communicated with the community throughout the process of acquisition of the former tannery annex and with the process of developing a redevelopment strategy for the structure.

The general public has been involved through Town Council meetings held on the potential reuse of the property.

The Town and HAR will conduct a Site tour of the property as a portion of a larger effort to involve the local community through public meetings as the project moves forward.

4.3 Key Community Concerns

From the ongoing Community Relations effort it was learned that local residents were concerned about the nature and extent of environmental contamination and the proposed reuse plans for the Site.

The community believes that with the redevelopment of the Site, positive benefits will accrue to neighborhoods and downtown businesses. Redeveloping the property into an incubator for small businesses is a huge benefit to the community.

¹ Data are from the 2010 U.S. Census data and is available at <http://www.census.gov/>

² Data are from the Bureau of Labor Statistics and is available at www.bls.gov

³ Data are from the U.S. Census 2012 American Community Survey and is available on American FactFinder at <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml>

5.0 CONTINUED COMMUNITY INVOLVEMENT

In order to solicit public comments on the approach to the remediation, a clear understanding of the Site background, the existing health and environmental risks, and need for response actions will be provided. Summaries of data and applicable State regulations will be presented for review. As part of the remediation planning process, remedial alternatives that have been considered will be reviewed with the public.

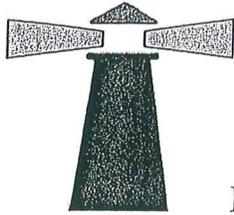
A legal notice will be placed in the Rolling Thunder Express announcing the availability of the Uncontrolled Sites Program (USP) documentation, which describes the environmental issues and to notify residents of a public meeting which will be held at the Information Repository. The notice will also announce the start of a thirty-day comment period on the draft ABCA. HAR will accept comments on the ABCA during the comment period and will provide written responses which will become part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status report and other communications.

Section 7 - Schedule

The following is proposed schedule of major milestones:

Community Relations Plan Completed – July 14, 2016
Repository of Documents Established – June 15, 2016
Draft ABCA Completed for Asbestos Abatement and submitted to MEDEP and EPA – July 14, 2016
Public Notice of ABCA and CRP available – July 15, 2016
30 day comment Period – July 15 – August 15, 2016
Date of Public Meeting – July 18, 2016
Date Comments on the ABCA to be Addressed – August 16, 2016
Bid Cleanup Work August 18, 2016
Cleanup to Begin on Asbestos Abatement – August 29, 2016
Cleanup to be Complete – Tentative September 15, 2016

Reference: USEPA Community Relations Plan Template



BEACON ENVIRONMENTAL CONSULTANTS, LLC

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation Irving Tannery Annex – Parcel 2 Tax Map 7 Lot 35-2, 154 Pleasant Street, Hartland, Maine

Prepared for the Hartland Annex Redevelopment LLC

I. Introduction & Background

a. Site Location

The site is located at 154 Pleasant Street in Hartland, Maine (the Site). See Figure 1 for a Site Location Map.

b. Previous Site Use(s) and any previous cleanup/remediation

Previous investigations stated the canning facility was constructed in 1913. Historic records reviewed indicate the oldest buildings assumed to be the original H.C. Baxter/Snowflake cannery structures constructed prior to 1917; those are the farthest east and closest to the former railroad tracks. In 1923 in an effort to expand their business the company began to can peas, string beans, and whole kernel corn, with this operation centered in Hartland, Maine. Over the years H.C. Baxter continued to expand its products including frozen vegetables and French fries. By the late 1950s and early 1960s, the company could no longer compete with canneries in other areas of the country and concentrated on processing potatoes. After the Hartland plant ceased operations in the late 1960s, it was acquired by Irving Tanning in 1963 and became known as the Tannery Annex. Leather finishing processes were conducted at the subject property, which utilized an assortment of pigments, lacquers, and solvents for spray and dipping applications. The tannery ceased using the building in 2012.

The Site is a portion of property conveyed from Irving Tanning to the Hartland Redevelopment LLC in January 2016.

c. Site Assessment Findings

Prior to taking ownership of the parcel, Hartland Redevelopment LLC hired CES, Inc. (CES) to prepare an ASTM Phase I Report for the entire property, dated October 2015. The ASTM Phase I Report identified Recognized Environmental Conditions (RECs) associated with this portion of the property in the form of petroleum-impacts and former underground storage tanks (USTs).

Previous environmental investigations associated with the Site are summarized in Table 1, which describes the type of the investigation, date, and contractor completing the

investigation. Each of these investigations were done on the entirety of the Irving Tannery Annex property prior to the division of the property in January 2016. Therefore, all of the information regarding Recognized Environmental Conditions (RECs) contained in the reports does not all apply to Lot 35-1 for which this ABCA was completed.

Table 1: Summary of Previous Investigations

Type of Investigation	Contractor Conducting Investigation	Date of Investigation	Field Work Completed
Phase I ESA	ENSR International (ENSR)	August 2005	Site visit
Phase I ESA Update	ENSR	October 2007	Site visit
Phase I ESA	Campbell Environmental Group (CEG)	March 2014	Site visit
Phase II ESA and Hazardous Materials Investigation	MAI, Inc. (MAI)	February 2015	Groundwater Sampling Asbestos Sampling Lead-based Paint Sampling Soil Sampling
Phase I ESA	CES, Inc. (CES)	October 2015	Site visit
Phase I ESA Update	CES	March 2016	Site visit

d. Project Goal

The planned reuse for the Site is a mixed commercial use. The Town does not currently have a commercial business incubator site and this property could serve this purpose.

The Town does not have zoning; therefore, no reuse is restricted.

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The cleanup will be overseen by the Maine Department of Environmental Protection (MEDEP). In addition, all documents prepared for this site are submitted to the state environmental department. This ABCA was completed by Beacon Environmental Consultants LLC (Beacon) for, and at the request of, the Hartland Redevelopment LLC (the Client) under a “Brownfields Subgrant” from the Maine Department of Environmental Protection’s (MEDEP) EPA Revolving Loan Fund Cooperative Agreement.

b. Cleanup Standards for major contaminants

Hartland Redevelopment LLC currently anticipates that the state standards for commercial use will be used as the cleanup standards.

c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits (soil transport/disposal manifests, UST removal notifications) will be obtained prior to the work commencing.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered

To address petroleum impacts at the Site, three different alternatives were considered, including Alternative #1: No Action, Alternative #2: UST removal and soil removal, and #3 UST removal and in-situ soil remediation.

b. Cost Estimate of Cleanup Alternatives

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness

- Alternative #1: No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.
- Alternative #2: Removal and off-site disposal of USTs and petroleum-impacted soil will meet remedial objectives; therefore, will provide protection to human health and the environment by removing the potential for petroleum contamination migrating from the Site. Additionally, the potential for future indirect exposure will be eliminated as the source materials will be permanently removed. Implementation of this alternative could have potential short-term adverse effects on site workers. Risk to site workers during removal activities will be minimized by adhering to the OSHA regulations. Off-site transportation of soils and cleaned USTs will comply with MEDEP Regulations and U.S. Department of Transportation (DOT) regulations to reduce potential exposure of the general public during transport to the disposal facility.
- Alternative #3: Removal of the USTs and in-situ soil remediation will meet remedial objectives; therefore, will provide protection to human health and the environment by removing the potential for petroleum contamination migrating from the Site. Additionally, the potential for future indirect exposure will be eliminated as the source materials will be permanently removed. Implementation of this alternative could have potential short-term adverse effects on site workers. Risk to site workers during removal and installation of bioremediation materials will be minimized by adhering to the OSHA regulations. Off-site transportation of the cleaned USTs will comply with MEDEP Regulations and U.S. Department of Transportation (DOT) regulations to reduce potential exposure of the general public during transport to the disposal facility.

Implementability

- Alternative #1: No Action is easy to implement since no actions will be conducted.
- Alternative #2: This alternative uses well demonstrated and readily available technologies. It is anticipated that removal of the USTs and the petroleum-impacted soil can be completed safely with heavy equipment. An environmental remediation contractor using trained personnel will conduct UST removal activities. In addition, a Licensed Tank Installer (LTI) will be on-site as required by MEDEP regulations.

Removal of the USTs and petroleum-impacted soil will facilitate future actions at the Site.

Submission of an UST removal notification to the MEDEP will be required prior to commencement of removal activities.

- Alternative #3: This alternative uses well demonstrated and readily available technologies. It is anticipated that removal of the USTs and introduction of a bioremediation agent via microwells across the area of impacts can be completed safely with heavy equipment, a Geoprobe, and a grout pump.
- An environmental remediation contractor using trained personnel will conduct UST removal activities. In addition, a Licensed Tank Installer (LTI) will be on-site as required by MEDEP regulations.

Removal of the USTs and installation of a bioremediation agent (TPH Enhanced[®]) will facilitate future actions at the Site.

Submission of an UST removal notification to the MEDEP will be required prior to commencement of removal activities.

Cost

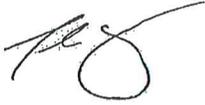
- There will be no costs under Alternative #1: No Action.
- It is estimated that Alternative #2: Abatement costs will be on the order of \$70,000.
- It is estimated that Alternative #3: UST Removal and In-Situ Remediation costs will be on the order of \$200,000.

c. Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #2: UST and Petroleum-Impacted Soil Removal. Alternative #1: No Action cannot be recommended since it does not address site risks. Alternative #2: UST Removal and Impacted Soil Removal – impacted soil will be transported to the Town of Hartland's landfill, for disposal and the USTs will be cleaned and sent for scrap metal. Alternative #3: UST Removal and In-Situ Soil Remediation – USTs will be removed, cleaned and sent for scrap metal and a bioremediation agent will be pumped into on-site microwells. This option would take at least 1 year to produce effective results. For these reasons, Alternative 2: Abatement is the recommended alternative.

Please feel free to contact me with questions concerning the remedial alternatives presented in this focused ABCA.

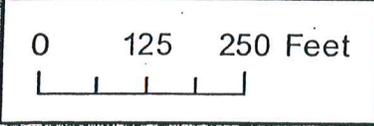
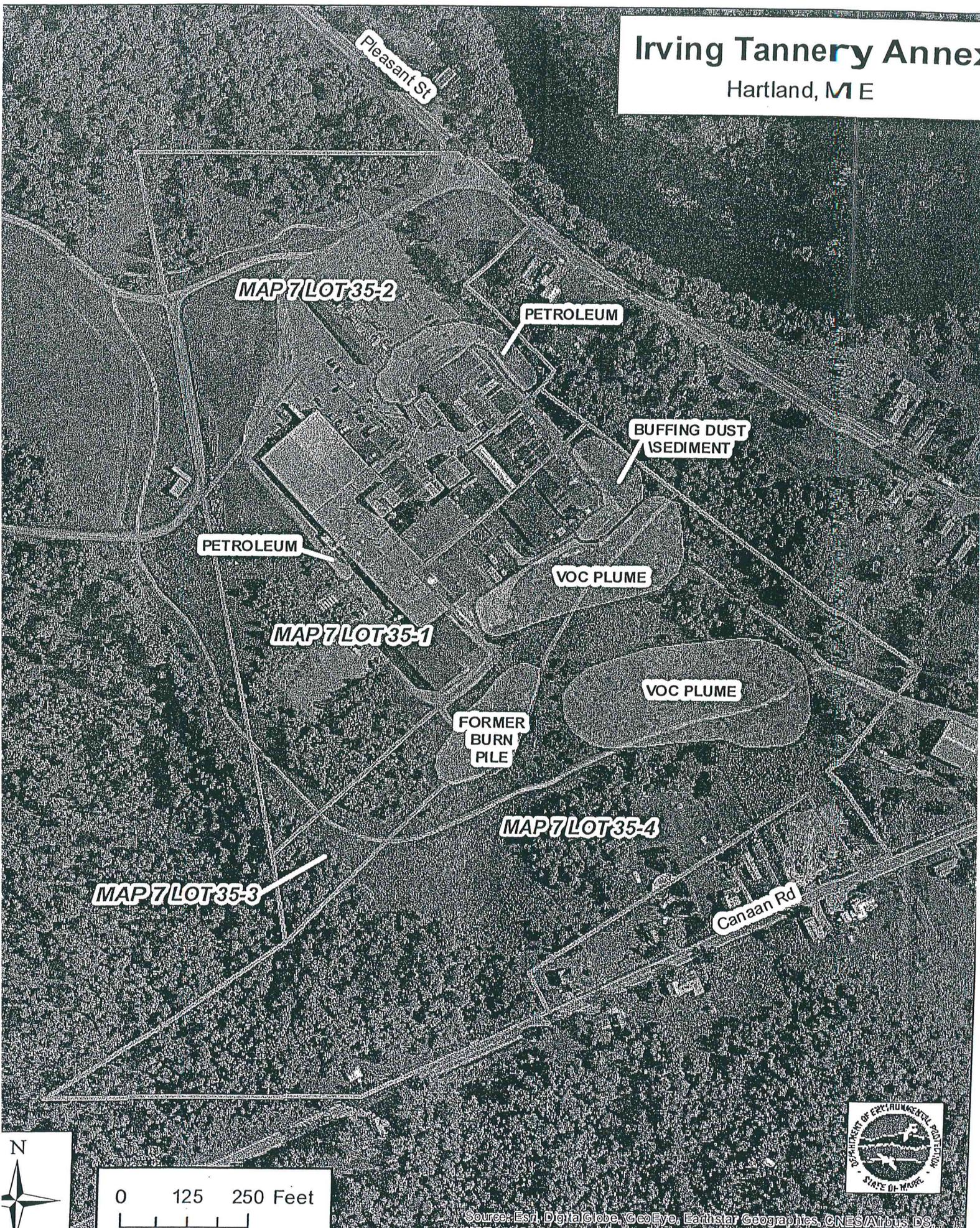
Sincerely,
BEACON ENVIRONMENTAL CONSULTANTS, LLC

A handwritten signature in black ink, appearing to read 'J. Cressey', with a large, stylized flourish at the end.

John K. Cressey, C.G.
President

Irving Tannery Annex

Hartland, ME



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community