

CLEANUP WORKPLAN

Town of Warren

Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement Period of Performance: 5/16/2025 - 9/30/2029

1. CFDA: 66.818 Multipurpose, Assessment, Cleanup, and Revolving Loan Fund Grants

OBJECTIVE: The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amended the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. The Brownfields Utilization, Investment, and Local Development (BUILD) Act of March 2018 reauthorized and amended the Brownfields provisions of CERCLA. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients are selected from applications prepared in accordance with the “Application Guidelines for Brownfields Assessment, RLF, and Cleanup Grants,” and submitted in a national competition. The Town of Warren, Maine, as a general purpose unit of local government, was selected for Cleanup funding in the FY 2025 competition.

The Target Area of this grant will be the Route 90 bypass corridor, which bisects the Town’s residential neighborhoods and includes gravel pits, industrial sites, and the proposed cleanup Site (and subject of this grant application) – the Steamship Navigation Site. Our Target Area is a 5-mile stretch of road which has been targeted by the Town as an area for commercial and industrial development. It has appropriate zoning and beneficial proximity to Route 1; however, these redevelopment attempts have been stymied by lack of available land and/or land with inadequate infrastructure. The Steamship Navigation Site is a 71.4-acre parcel with enough acreage and frontage on Route 90 to support commercial redevelopment; however, the sale and/or redevelopment of the site is impossible due to mountains of polyester waste carpet materials present onsite, which represent an ongoing threat to both human health and the environment. Placement and accumulation of this per-and polyfluoroalkyl substances (PFAS)-contaminated waste fiber at the Site began in 1998, when the former Site owner accepted carpet waste from Gates Formed-Fibre Products under a permit from the Maine Department of Environmental Protection (MEDEP). It is estimated that over 300,000 cubic yards of waste material was subsequently illicitly brought to the Site, causing an environmental and legal nightmare for the Town.

In order to fully remediate the Site and facilitate its redevelopment, the Town was forced to foreclose on the Site in 2022, after having waived the option to do so for the previous 23 years. This Brownfield Cleanup grant will be used to manage and remediate the carpet waste materials onsite, and mitigate associated soil and groundwater contamination, allowing for much-needed commercial and industrial development in the Target Area. This grant will also mitigate the Town's most visible Brownfields Site, biggest eye sore, and environmental threat to residents.

Cleanup contractors will comply with Davis Bacon requirements. During cleanup, the public will be protected from onsite contaminants through erosion and sedimentation control, dust suppression, site security measures, and perimeter air monitoring as needed. A Community Engagement Plan will be prepared, public meetings and outreach will occur, and the ABCA will be finalized. The QEP will prepare a SSQAPP and conduct confirmatory soil sampling. A Voluntary Response Action Plan (VRAP) Completion Report will be submitted to MEDEP to obtain a VRAP Certificate of Closure.

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of Brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the Town Planner (Project Administrator), assisted by the Town Manager (Project Assistant), Finance Director, and Town Attorney, with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and the VCP.

Describe your project and cleanup plan:

The subject of this application is the Steamship Navigation Site, a 71.4-acre site located at 2287 Camden Rd/Route 90 (Map R11, Lot 38), located centrally in our Target Area. The Site was formerly improved with an industrial building, garage, and mobile home; buildings were demolished in January of 2024 as part of a MEDEP cleanup action. The Site formerly maintained several outdoor firing ranges. To lessen the sound of the shooting range and absorb ammunition fragments, the former Site owner accepted waste carpet material (non-woven fabric used in the manufacturing of automobile trunk liners) from Gates Formed-Fibre in Auburn, Maine to create berms and backstops. Site investigations have estimated that over 300,000 CY of carpet waste (over 500,000 tons) is currently stockpiled on Site, covering over 30 acres, and, in some areas, stacked 20+ feet high.

The former owner abandoned the Site in the late 1990's, and in April of 2001, the State of Maine and MEDEP filed a complaint against the Steamship Navigation Company, seeking injunctive relief and civil penalties for violations of Maine statutes, regulations, and MEDEP orders related to the waste carpet material. A small settlement of approximately \$500,000 was awarded to the Town, which allowed the MEDEP to conduct the January 2024 demolition/abatement actions, but did not address the waste carpet stockpiles. The Town understood that in order to ever fully remediate the Site, they would be forced to foreclose; in December of 2022, the Town voted to foreclose on the Site for delinquent taxes and is now the Site 2 owner. The Site is currently vacant, except for the massive quantities of waste carpet materials onsite.

The 71.4-acre Site contains over 300,000 CY of waste carpet material covering over 30 acres. The carpet waste is contaminated with PFAS and arsenic, soils underlying the waste contain PFAS at concentrations above the 2023 MEDEP RAGs, and groundwater beneath the Site contains PFAS at concentrations above the MECDC MEGs. The objectives of our cleanup plan are to reduce/eliminate the potential for human exposure to contaminated soil and fill materials at the Site, prevent PFAS from continuing to leach out of the waste materials and impacting groundwater and down-gradient receptors, and facilitate redevelopment of the Site for varying uses. Groundwater impacts will be mitigated through deed restrictions and restrictive covenants.

Our cleanup plan includes: 1) relocating the waste material into an approx. 13-acre consolidation area in the southern portion of the Site (as part of cleanup design, waste reduction methods will be evaluated to try to minimize the size of the consolidation area); 2) excavation of 2 feet of contaminated surficial soils in areas of carpet stockpiles (soil will be placed in the consolidation area, and excavated areas would be backfilled with clean fill); 3) Site re-grading to facilitate the proposed redevelopment plans (approx. 10 acres of commercial development on Route 90, approx. 10 acres of recreational fields, and grading the consolidation area to allow for solar field development), 4) construction of cover systems over the consolidation area to prevent human contact with contaminated waste/soils and prevent rainwater from further leaching contamination into the groundwater. Cover systems would be constructed per the U.S. EPA Technical Guidance for RCRA/CERCLA Final Covers and would likely consist of leveling sand, a 40-mil HDPE Geomembrane, geocomposite drain and drain piping, vegetative soil, and topsoil; and 5) institutional controls, deed restrictions, an Environmental Media Management Plan, and Post-Closure Cover System Maintenance Plan to ensure that future construction and earthwork at the property are protective of the cover systems and underlying materials.

There are two main goals for this cleanup grant: to mitigate environmental issues at the Site, and spur development in our Target Area. We will do this by consolidating carpet waste and contaminated surficial soil from the northern/eastern portion of the Site into an approx. 13-acre consolidation area in the southern portion of the Site. The consolidation area would be finished with a robust cover system designed to shed water and prevent further leaching of PFAS into the underlying soil and groundwater.

Once the 71.4-acre Site is cleaned up, and the mountains of waste carpet fibers are consolidated and covered, the Town plans to subdivide the property and sell approx. 10 acres of land along Route 90 to facilitate commercial and industrial development. The cleanup plan proposes to remove all carpet waste and contaminated surficial soils from this redevelopment area; as such, there would be no impediment to the construction of buildings, infrastructure, and utilities. The Town will use the proceeds of this sale to fund the construction of an approx. 10-acre recreational area in the eastern portion of the Site, which would be owned and maintained by the Town; this area would contain youth sports fields and publicly accessible greenspace and walking trails.

The Town plans to investigate utilizing remaining portions of the Site (covered consolidation area and surrounding acreage) for solar development. The waste materials will be graded, and the cover system itself will be constructed in a manner which would allow for solar field development. These “Brightfields” enable a responsible form of industrial redevelopment and clean energy generation; and the Public Utilities Commission recently approved rules that pave the way for large-scale solar development on PFAS- polluted land (SP 622, LD 1591 “An Act to Promote Economic Reuse of Contaminated Land Through Clean Energy Development”), which will make our Site significantly more marketable to developers.

The cleanup and redevelopment of the Site is directly in line with the Town’s area revitalization plans. The Town has been evaluating this Site since litigation with the former owners began in 2001. Before the Town took ownership, the ‘Steamship Navigation Advisory Committee’ was developed to consider the benefits and challenges associated with foreclosing on the property; evaluate potential cleanup and redevelopment funding options; provide public outreach; and

ultimately provide a recommendation on whether to foreclose. The committee met monthly over approx. 18 months. Warren is also in the process of updating their Comprehensive Plan. The Route 90 Corridor Target Area and Steamship Navigation property will both be highlighted as areas for proposed economic redevelopment, with Brownfields cleanup and redevelopment cited as potential mechanisms for funding. The Comp Plan committee is be staffed with citizens, assisted by the Town Planner, and overseen by the Town; and its development includes a public outreach component.

2. FUNDING: \$4,000,000

3. BUDGET:

	Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Site-Specific Activities	Task 4 Oversee Site Cleanup	Total
Personnel	\$22,500	\$21,000	\$22,500	\$22,500	\$88,500
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$6,000	\$0	\$0	\$0	\$6,000
Equipment*	\$0	\$0	\$0	\$0	\$0
Supplies	\$500	\$500	\$0	\$0	\$1,000
Contractual	\$14,500	\$8,500	\$3,815,000	\$66,500	\$3,904,500
Construction*	\$0	\$0	\$0	\$0	\$0
Other	\$0	\$0	\$0	\$0	\$0
Total Direct:	\$43,500	\$30,000	\$3,837,500	\$89,000	\$4,000,000
Indirect Costs:	\$0	\$0	\$0	\$0	\$0
Total Budget	\$43,500	\$30,000	\$3,837,500	\$89,000	\$4,000,000

* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

* Include construction activities such as alterations, repairs, and excavations of a building, structure, or other improvements to real property under the “Construction” line, not “Contractual.” Repairing buildings, repairing facilities, demolition, and site prep work for remediation count as construction costs. Construction activities carried out by the applicant’s own employees are “Personnel.” If it is not known how much is expected of construction costs, leave the field blank and put the funds into contractual for now. The budget will need to be amended once construction costs are known.

4. WORKPLAN TASKS:

Task 1: Cooperative Agreement Oversight

Task 1 - Cooperative Agreement Oversight Subtasks (Commitments) Pre-Cleanup	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
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Obtain QEP Services: • Program development and organization • Prepare Request For Proposals/Qualifications, evaluate applications, conduct interviews, hire contractor • Prepare scope of work • Prioritize, track and evaluate contractor products • Conduct periodic project status meetings with contractor to discuss project issues and priorities • Conduct annual performance evaluations for contractor	Outputs: • High quality contractor work products that meet the recipient's and EPA's expectations • Confirmation in quarterly report that contractor selection was completed and made Outcomes: • Maintain effective work force to meet workplan commitments	12/31/25	
Reporting: • Prepare MBE/WBE annually, and FFR annually and at grant closeout • Enter site data in ACRES • Prepare Quarterly Reports via ACRES and quarterly meetings with BAC/QEP/project stakeholders/regulators • Prepare final report and grant closeout material	Outputs: • Quarterly reports and other forms; updated ACRES database; final report and closeout forms • "Success Story" fact sheets and quarterly stakeholder updates Outcomes: • Ensures compliance with Terms & Conditions reporting requirements	1/30/26 Quarterly stakeholder meetings, ACRES updates and Quarterly Reports every quarter; MBE/WBE forms annually by 9/30; SF425 FFR annually by 10/30	
Records: • Maintain grant files • Maintain site project files • Maintain financial records	Outputs: • Accurate and complete files suitable for audit purposes Outcomes: • High quality project records reflective of the work performed	10/1/25 and thereafter	
Request for Reimbursements or Advances:	Outputs: • Drawdowns from ASAP Outcomes: • Reduce unliquidated obligations	10/1/25 and thereafter	
Travel & Training • Attend brownfields related meetings, training sessions and conferences	Outputs: • Attend National Brownfields Training Conference • Attend Regional Brownfields Summit(s)	8/2025 12/2026	

Task 2: Community Outreach and Engagement

Task 2 – Community Outreach and Engagement Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Prepare Community Relations Plan • Prepare plan to involve public in cleanup activities	Outputs: • Plan for involving the community in cleanup activities Outcomes: • Improve understanding and participation in cleanup and redevelopment process	6/30/26	
Establish Information Repository	Outputs: • Repository of documents which allows public to review site assessment & cleanup history Outcomes: • Improve understanding of how cleanup alternative was selected	9/30/26	
Implement 30-Day Public Comment Period on ABCA	Outputs: • Allow for review and comment of cleanup related documents Outcomes: • Allow for consensus on cleanup	9/30/26	
Public Meetings • Develop a CEP, outreach materials, and press releases	Outputs: • Meetings which inform public of cleanup activities and provide a chance for input & comment Outcomes: • Improve understanding of cleanup and allow for potential modifications based on public input	By 1/30/26 and then quarterly thereafter	

Task 3: Site-Specific Activities

Task 3 – Site-Specific Activities Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Hold a kickoff meeting with State, EPA and QEP	Outputs: • Held meeting Outcomes: • Ensure all agencies are in agreement with cleanup plan	3/31/26	
Ensure Site is Enrolled in VCP • Ensure the grantee has enrolled site in the applicable state response program	Outputs: • Site is enrolled in applicable state response program Outcomes: • Cleanup is in compliance with state response program	6/30/26	
Historic Preservation • Assist EPA project Officer in collecting information and determining if Section 106 applies	Outputs: • Information and reports required to comply with Section 106 Historic Preservation requirements Outcomes: • Compliance with Section 106 Historic Preservation requirements	12/31/26	
Prepare Analysis of Brownfields Cleanup Alternatives (ABCA)	Outputs: • Approved ABCA documenting how and why cleanup alternative was selected • ABCA placed in information repository, etc. Outcomes: • Ensure proper cleanup alternative is selected and communicated to the public	9/30/26	
Prepare Decision Document • Document results of public comment period and public meeting to include comments received, public meeting attendance, response to relevant comments, selection of final cleanup remedy, any changes to the final cleanup remedy, etc.	Outputs: • Memo or letter, with appropriate attachments Outcomes: • Ensure that public comment process is documented and final cleanup remedy is selected	3/31/26	

Prepare Remedial Design & Engineering Documents • Prepare appropriate remedial design documents for state response program, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to clean up sites	• Approved remedial action and engineering/design documents and an approved budget • Place documents in information repository, etc. Outcomes: • Ensure cleanup will be done in compliance with state response program and EPA funds will be used for eligible costs	6/30/26	
Prepare Site Specific Quality Assurance Project Plan and Health and Safety Plan • Prepare a SSQAPP for any environmental post cleanup sampling to be conducted on sites and submit to EPA for approval	Outputs: • EPA approved SSQAPP • Place SSQAPP in information repository Outcomes: • Ensure proper confirmatory testing methods and analytical data results are achieved	6/30/26	
Cleanup Contractor Conducts Cleanup Activities as Specified in Final Remedial Design & Engineering	Outputs: • Site cleanup completed to designed specifications Outcomes: • Town, State, EPA, QEP, and Cleanup Contractor are prepared for project closeout	TBD	

Task 4: Oversee Site Cleanup

Task 4 – Oversee Site Cleanup Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Oversight of Cleanup Activities • QEP conducts appropriate site inspections during remediation to ensure compliance with cleanup plans • Coordination with MEDEP and EPA	Outputs: • Number of inspections • Site reports by QEP • Documents placed in information repository Outcomes: • Ensure cleanup is conducted in compliance with VCP	TBD	
Davis-Bacon Documentation • Conduct site inspections to ensure proper wage rates and posters are available to workers on-site • Collect, review and maintain payrolls • Conduct on-site labor interviews	Outputs: • Payrolls, labor interviews, etc. Outcomes: • Ensure compliance with Davis-Bacon requirements	TBD	

Collection of Post-Cleanup Samples	Outputs: • Number of samples and analytical results Outcomes: • Ensure cleanup has met VCP cleanup levels	TBD	
Cleanup Documentation • Prepare and submit close-out documentation to state indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long-term monitoring	Outputs: • Final cleanup reports documenting cleanup is complete • Place documents in repository, etc. Outcomes: • State approval of cleanup and ensure cleanup is protective of human health and the environment	TBD	
Cleanup Complete Documentation • Receive final cleanup complete letter from state and submit to EPA	Outputs: • Letter from State/LSP/LEP • Letter submitted to EPA • Placed letter or documentation in information repository, reported in ACRES, and quarterly reports, etc. Outcomes: • Site is officially clean and ready for reuse • # Estimated number of brownfields property acres available for reuse	TBD	

5. QUALITY ASSURANCE

Prior to undertaking confirmatory sampling, the *Town of Warren* will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, and the methods and procedures that will be used. QAPP approval will be obtained prior to performing any field activity.

6. PRE-AWARD COSTS

Town of Warren requests the approval of pre-award costs for this cooperative agreement. It is estimated we will need \$10,000 to do the following activities:

\$4,900 Travel – All travel costs for 2 staff to attend 2025 National Brownfields Conference

\$5,100 Personnel – Town staff time for program development, organization, and preparing bidding documents for QEP selection, as well as ongoing communications and facilitation of the grant

7. BUDGET DETAIL - ATTACHMENT 1