



400 Commercial Street, Suite 404
Portland, ME 04101
207.772.2891

June 20, 2022

Project 111.06134.306

Mr. Earl MacKenzie, Manager
Old Belfast Bank, LLC
PO Box 41
Islesboro, ME 04848

RE: Status Letter – Environmental Conditions
Former Em-Bee Cleaners Property
126 Church Street
Belfast, Maine

Dear Mr. MacKenzie:

On behalf of Old Belfast Bank, LLC, Ransom Consulting, LLC (Ransom) is pleased to present this Status Letter regarding the current environmental status for the former Em-Bee Cleaners property located at 126 Church Street in Belfast, Maine (the “Site”).

BACKGROUND AND SITE DESCRIPTION

The Site encompasses approximately 0.09 acres of land located in a primarily commercial area of downtown Belfast. The Site was formerly improved with one building (the “Site building”), which was formerly known as the Em-Bee Cleaners building. The building has subsequently been demolished (early 2020) and was formerly connected to municipal water and sewer services. The Site building was formerly heated with a fuel oil-fired boiler.

Based on available historical information, the Site was improved with a residence prior to 1884. Between 1884 and 1895, the Site was improved with two structures; one functioning as a residence and the other attached structure functioning as a clothing factory between 1890 and 1901, when it is described as a dining facility. Between 1901 and 1912, the two structures were replaced with the current three-story wood-framed structure with a coal-fired boiler and elevator. This building was operated as Thompson’s Manufacturing Company, producing men’s workwear, until the early 1930’s. Between the early 1930’s and 1948, the Site operated as Maritime Quality Hardware, reportedly assembling padlocks until the late 1940s. A printing company reportedly operated at the Site, between the late 1940s and 1956. At approximately the same time, the lower floors of the Site were converted to a dry-cleaning facility, which operated at the Site until 2010. The Site has remained vacant since dry cleaning operations ceased.

Between 2011 and 2021, the prior owner GEO Remediation Company (GEO), completed site investigation and remedial actions regarding identified chlorinated solvent contamination at the Site, and completed a hazardous waste closure certification in accordance with the MEDEP Chapter 851 Hazardous Waste Management Rules. GEO completed a Draft Hazardous Waste Closure Report, dated December 3, 2021. On December 29, 2021, the MEDEP issued a Conditional Acknowledgment Letter for Hazardous Waste Generator Closure Certification with the following conditions for the generator closure:

1. Installation of a vapor barrier capable of mitigating vapor intrusion of contaminants of concern, as noted in the Draft of Closure Report;

Innovating Resilient Solutions

Portland, ME ~ North Andover, MA ~ Portsmouth, NH ~ Hamilton, NJ ~ Glassboro, NJ ~ Providence, RI
www.ransomenv.com

Mr. Earl MacKenzie, Manager
Old Belfast Bank, LLC

2. Installation of sub-slab piping capable of being used as an active sub-slab depressurization system (SSDS), if indoor air monitoring detects contaminants of concern, as noted in the Draft of Closure Report, above the Maine Remedial Action Guidelines (RAGs) exposure criteria for residential use scenario;
3. A post-construction indoor air sample for the contaminants of concern as noted in the Draft of Closure Report;
4. Activation of the SSDS if the indoor air results warrant activation; and
5. A Declaration of Environmental Covenant (DEC) covering the needs of the RCRA (Resource Conservation and Recovery Act) hazardous waste generator closure and VRAP (Voluntary Response Action Program) that meet the universal environmental covenants act (UECA).

CURRENT PROJECT STATUS

On February 28, 2022, the property was submitted to the Maine Department of Environmental Protection (MEDEP) Voluntary Response Action Program (VRAP). The MEDEP VRAP is a voluntary program that offers technical review of environmentally impacted sites and ultimately provides environmental liability protections from the State of Maine for interested parties, including a “No Action Assurance” (NAA) letter, “No Further Action Assurance” (NFAA) letter, and/or a “Certificate of Completion” letter (i.e., no further action required), provided that proper and appropriate environmental assessment and/or cleanup/remedial actions are completed, as applicable and approved by the MEDEP.

A Conceptual Remedial Action Plan (RAP) was also prepared and submitted the MEDEP with the VRAP application. Following review and acceptance of the Site into the VRAP program, the MEDEP issued a VRAP No Action Assurance (NAA) Letter for the Site on March 28, 2022. The MEDEP VRAP NAA Letter conditioned the following requirements for the Site:

1. Implement the Department reviewed and approved Conceptual Remedial Action Plan for the Site, dated February 28, 2022.
2. Submit an environmental media management plan (EMMP) to the Department for review and approval prior to any soil disturbance activity and implement the approved EMMP. The Plan must address the procedures that need to be taken for the proper on-Site and off-Site management and disposal of contaminated soils and groundwater identified at the Site. Soil may not be moved off-Site without the express written permission of the Department.
3. Submit a plan, subject to Department review and approval, to install a vapor barrier and a sub-slab depressurization system at the Site and install and effectively operate the approved system.
4. A Declaration of Environmental Covenants, in accordance with the Maine *Uniform Environmental Covenants Act*, 38 M.R.S. §§ 3001–3013 (2005), incorporating conditions of



Mr. Earl MacKenzie, Manager
Old Belfast Bank, LLC

approval contained in any future VRAP Certificate of Completion (“COC”) for the above-noted remedial actions, and that is subject to Department review and approval, must be executed for the Site and must be recorded at the Waldo County Registry of Deeds. The DEC will likely contain the following conditions:

- a. The extraction of groundwater at the Site is prohibited without the express written permission of the Department.
- b. Soils that are currently located in situ at the Site and soils that may be disturbed during redevelopment of the Site must be managed according to a Department-approved Environmental Media Management Plan (EMMP) and may not be moved off-Site without the express written permission of the Department. To limit potential dermal and oral contact with soil, the plan must include provisions for maintaining Department-approved cover systems.
- c. New buildings constructed at the Site in the future must include a Department-approved vapor barrier that is installed in accordance with manufacturer’s specifications and a sub-slab depressurization system that is effectively operated, unless the express written permission of the Department is obtained to exclude such a system from the design of a new building or to terminate operation of such a system once installed.

A copy of the MEDEP VRAP NAA Letter is attached for reference. In accordance with the NAA Letter, a MEDEP-approved Environmental Media Management Plan (EMMP) was finalized on May 13, 2022, and a Vapor Mitigation System (VMS) Basis of Design Memorandum was prepared on June 13, 2022; copies of these documents are also attached for reference.

In support of the proposed Site redevelopment activities, these MEDEP-approved documents satisfy the requirements of the VRAP NAA Letter. Following construction and implementation of the EMMP and sub-slab VMS, a VRAP closure report will be prepared for MEDEP review and approval. Following approval, the MEDEP will issue a Certificate of Completion (COC) for the Site and a final Declaration of Environmental Covenant will be prepared, approved, and recorded at the Registry of Deeds.

Thank you for the opportunity to assist you on this project. If you have any questions regarding the findings of this letter report, please do not hesitate to call us at 207-772-2891.

Sincerely,

RANSOM CONSULTING, LLC



Peter J. Sherr, P.E.
Senior Project Manager

Attachments



Attachment A

MEDEP VRAP No Action Assurance (NAA) Letter

Attachment B

Environmental Media Management Plan (EMMP)

Attachment C

Basis of Design Memorandum – Sub-Slab Vapor Mitigation System (VMS)