Narrative Information Sheet – Brownfields Cleanup Grant

1. Applicant Identification: City of Bangor, Maine. Administrative offices are located at 73 Harlow Street, Bangor, ME, 04401.

2. Funding Requests:
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested
      i. $500,000
      ii. Bangor is not requesting a 20% cost share waiver
      iii. Bangor is not requesting a waiver of the $500,000 limit

3. Location: The site is located in the City of Bangor, Penobscot County, Maine.

4. Building #610 located on Bangor International Airport property, 287 Godfrey Blvd., Bangor Maine 04401.

5. Contacts:
   a. Project Director: Tyler Collins – Community & Economic Development Officer. (207)992-4280. tyler.collins@bangormaine.com 73 Harlow St., Bangor, ME 04401
   b. Highest Ranking Elected Official: Richard Fournier – City Council Chair. (207)992-4205. richard.fournier@bangormaine.gov 73 Harlow St., Bangor, ME 04401.

6. Population: Bangor has a population of 31,753

7. Other Factors Checklist:
8. Letter from State Environmental Agency: Attached

9. Releasing Copies of Applications: N/A; No confidential, privileged, or sensitive information included.
November 17, 2021

Ms. Dorrie Paar  
EPA Region I  
5 Post Office Square  
Suite 100, Mailcode: OSRR7-2  
Boston, Massachusetts 02109-3912

Dear Ms. Paar:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the City of Bangor plans to conduct cleanups and is applying for federal Brownfields grant funds.

Tyler Collins of the city has developed an application requesting site-specific federal Brownfields Cleanup funding for Building #610-Alert Building, which is located at Bangor International Airport in Bangor, Maine.

If the city receives funding, the Department's Voluntary Response Action Program ("VRAP") staff will provide review and comment on feasibility studies and remedial workplans, and will provide oversight (as necessary) of contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 592-0882 should you have any questions regarding this letter.

Sincerely,

Nicholas J. Hodgkins  
Voluntary Response Action Program  
Division of Remediation  
Maine Department of Environmental Protection

Pc: Tyler Collins, City of Bangor
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

A. Target Area and Brownfields

i. Background and Description of Target Area:
Early settlers following the Penobscot River in central Maine initially came to the Bangor area for fishing and fur trading. In the 1800s, Bangor became heavily engaged in shipbuilding and commerce associated with the lumber trade. The buildings and shipyards constructed to service these industries populated Bangor’s waterfront and downtown areas over time. The shipbuilding industry evolved to utilize steel and steam, and Bangor’s dominant industry subsequently focused on forestry and pulp and paper production in the 20th Century. The use of the railroads for transporting chemicals, materials, petroleum, and paper became much more extensive in the area until the industry’s decline in the late 1900s.

Today, Northern and Central Maine have seen a shift from the traditional paper mill economy. In particular, five mills in northern Penobscot County have closed since 2008. With these closures, we have seen more than 1,300 jobs lost and the decimation of the communities that were home to these mills. Because Bangor is the economic hub for all of Northern and Central Maine, these closures have had, and continue to have a significant impact on Bangor. Once thriving warehousing complexes located in Bangor have been forced to downsize and seek alternative means to make ends meet because storage is no longer needed for bulk paper making related products. Several trucking companies headquartered in Bangor have also downsized due to lack of products to transport, likewise, goods and services produced or located in Bangor are no longer needed at these mills forcing these businesses to explore new business opportunities.

The central portion of Bangor will be the target area for this grant that includes the area extending from the Bangor International Airport (BGR) to the Westside Village area of downtown and industrial waterfront of the Penobscot River (census tracts ME019000500 through 700 and 900). The target area has been of significant interest in recent years. While the City has been trying to boost aviation related business use of the area to replace the jobs lost to the mill closures, these areas contain former industrial Brownfields (like the Alert Building, the subject of this cleanup grant), significantly blighted residential neighborhoods, and home to one of the poorest sensitive populations in Bangor.

ii. Description of the Proposed Brownfield Site(s):
BGR Airport was first developed in 1927 as part of Godfrey Field, a municipal airport for the City, until a lease agreement was signed with the U.S. Army to construct facilities for the 43rd Bombardment Group. In 1942, the installation was officially referred to as Dow Army Airfield. By 1943, the Federal government acquired 750-acres surrounding the airfield by condemnation and/or purchase. The deed contained a clause reverting ownership back to the City when the Federal Government no longer needed it for military purposes.

The Alert Building (the subject of this cleanup grant) was built sometime after the opening of Dow Army Airfield in 1942, and before the closure of Dow AFB in 1968, to serve as aircraft pilot living quarters and rapid response facility in the event of a national security threat. It is located on an approximate 1.3-acre area in the southern portion of the airport south of an unused taxiway and aircraft stands. Once Dow AFB closed in 1968, the City regained ownership of the Site and the Site building was abandoned, and has remained so since 1968. As a result, the structure is severely dilapidated and no longer safe to enter due to collapsed roofing components, mold covered building debris is present throughout, and the structure is severely damaged resulting from exposure to the elements. Additionally, the sub-basement boiler room is typically flooded with water, as observed during past Site visits, making it entirely inaccessible. In 2016, a Phase II
Environmental Site Assessment was completed while the building was still accessible. Results indicated that substantial hazardous building materials were present throughout the building including lead paint, asbestos, and polychlorinated biphenyls (PCBs), and that a buried fuel oil supply line was present outside the building. Due to its dilapidated nature, wildlife including birds and small animals have taken residence within the building, which threaten approaching and departing aircraft with wildlife strikes. Thus, the Federal Aviation Administration (FAA) has deemed the building a wildlife hazard, resulting in the airport needing to remove the building, which necessitates this cleanup grant for the Site.

B. Revitalization of the Target Area
i. Reuse Strategy and Alignment with Revitalization Plans
Bangor currently has a nearly 100% occupancy rate of warehouse type spaces and is in desperate need for additional commercial/industrial space to promote business. Similarly, all available commercial/industrial space within the BGR airport is occupied and operating at full capacity, which is hindering the expansion of aviation related business and shipping/warehousing operations necessary to support airport and other local area businesses. The BGR airport is currently completing an airport master plan in 2021, which identified that additional hangar and warehouse space is crucial to not only support business growth, but to expand and capitalize on the expanding aviation and aerospace industries. As part of the planning process the public was engaged in several public meeting which provided opportunity for input on the projected reuse of the site. In addition, the City is currently completing an Economic Development Plan and research for that plan has shown that, currently, there is effectively no industrial or warehousing space available in the City.

As such, once the Alert Building is cleaned up and the building removed, BGR intends to construct a new 12,000 s.f., state of the art temperature controlled international warehouse facility at the Site. This new facility will provide not just a community asset, but a regional service to support the state’s economy with business from beyond our borders. The opportunities for international cargo would increase significantly, particularly with a portion of the facility to be used as a Customs bonded warehouse controlled by U.S. Customs for the storage of imported goods. This facility will support Maine’s export market to include seafood, flowers, pharmaceuticals, and perishable foods.

ii. Outcomes and Benefits of Reuse Strategy
The Bangor target community is a disadvantaged community according to the Justice40 Initiative as a result of high percentages (over 80th percentile) for low-income populations compared to State, EPA region, and even national averages. Our target community needs higher quality, better paying jobs. Bangor’s reuse strategy is to directly address the target community’s need to clean up the hazardous substances at the Alert Building by removing the building to allow for the construction of new warehouse space to support high paying jobs. This directly aligns with the 2021 airport master plan recommendations, and the City’s overall need for additional commercial/industrial space. By removing the building, an aviation wildlife hazard will be directly eliminated, which will also bring the BGR airport into compliance with FAA requirements and provide a direct safety improvement for the airport. The economic impacts are also clear. First, the grant would alleviate a large strain on the BGR’s fixed capital improvement budget that to date has prevented the cleanup of the Site. Second, the construction of the warehouse is projected to directly invest $8 million into the local economy. Third, the redevelopment of the Site is expected to create at least 40 temporary local construction jobs during construction, and support 35 additional good paying aviation related full-time jobs (according to the Bureau of Labor Statistics, the median salary of airport workers is $60,550 [and provide health insurance too] compared to the overall median wage
to $38,640), which would be a significant boost to the local economy considering Bangor’s high percentages of low-income populations (when compared to both U.S. and Maine). In addition, the new facility is expected to generate between $300k and $600k in additional revenue for BGR per year. While architectural/construction design plans are not yet completed, BGR intends to construct a state-of-the-art modern facility and plans to incorporate high efficiency HVAC equipment for temperature control.

C. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The following resources will be leveraged as part of the project: The City of Bangor’s Brownfields Assessment Program currently has $60,000 in funds remaining that is currently being used to support remediation planning at the Site as well as conduct preliminary engineering and submission of the Site to the Maine Voluntary Cleanup Program. LD1086, An Act To Authorize a General Fund Bond Issue To Upgrade Customs Facilities at the Portland International Jetport and the Bangor International Airport To Promote International Tourism and Commerce, is currently in the Maine Legislature that will provide $14 million to support the construction of the warehouse facility at BGR (along with a border patrol project at the Portland Jetport). This will be voted on in the spring 2022. Lastly, the BGR Airport General Budget will be leveraged to provide the 20% match for the project. This is provided in Capital Improvement Program of the Airports 2022 budget.

ii. Use of Existing Infrastructure

The reuse of existing infrastructure will be a necessary component of the redevelopment of site. The redevelopment has access to existing electricity, water and sewer services; will utilize stormwater systems already in place at the site; will leverage existing transportation options in place at BGR including the Bangor’s Community Connector bus service; and, has easy access to Interstate 95, local highways and managed parking.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

A. Community Need

i. The Community’s Need for Funding

Brownfield sites in Bangor have resulted in a larger tax burden on the Bangor citizens (the mill rate has been over 2.5 percentage points higher than the Penobscot County average each year since 2005), who, because Bangor is the service center and economic hub for all of central and northern Maine and the seat of Penobscot County, are already feeling the strain of economic hardship as a result of the minimization of the local forestry and paper industries, and higher low-income populations than both the state and national indexes. Since 2010, Penobscot County has seen at total real estate valuation decrease of approximately 2%. Additionally, Bangor has lost close to 150 businesses since 2008, which represents a roughly 5% reduction in total number of firms.

In the face of these challenges, the City struggles to maintain core services of police and fire protection while the older home stock and demographics in our target areas create more demand for these services (i.e. vandalism, fires, crime, etc.). Bangor is already relying on leveraging several sources of funding to create economic opportunity in the City that will utilize any remaining general fund dollars. These cleanup funds are necessary for this project to move forward and there are no additional funds from which we can draw upon.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations:
According to EPA’s EJScreen tool, the target community suffers disproportionately high percentiles of several Environmental Justice (EJ) indexes (over 75<sup>th</sup> percentile compared to rest of the State) including PM2.5, Ozone, Air Toxics Cancer Risk, Respiratory Hazard Index and Superfund Proximity. This data highlights how the health and welfare of our sensitive low-income populations are adversely impacted. Environmental site investigations at the Site have identified elevated levels of PCBs, lead and asbestos. The basement is known to fill with water when during spring melt off and during significant rain events. There is concern that the contaminated water could make its way into the Impaired Watershed of Birch Stream. This watershed flows northeast and eventually drains into the Kenduskeag Stream after passing through several neighborhoods that contain public and subsidized housing.

This grant will clean up the lead, asbestos and PCBs at the Site therefore directly reduce these environmental threats to our low income, sensitive populations. The cleanup will also lead to improved water quality of the impaired Birch Stream and Kenduskeag Stream. Lastly it will improve the welfare of our target community by providing better higher paying jobs in our underserved community.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to EPA’s EJScreen tool, the target community has very high impacts from environmental indicators (over 80<sup>th</sup> percentile compared to rest of State) for NATA Cancer Risk, Respiratory Hazard Index, Lead Paint Indicator, and Hazardous Waste Proximity. In addition, in 2015, the Maine Centers for Disease Control, prepared a Maine Shared Community Health Needs Assessment for the Penobscot County; Bangor being the largest community in Penobscot County. The data indicates that sensitive populations in the Penobscot region and in particular, Bangor, including our low-income populations, have a greater risk of many health affects compared to the State as a whole. These sensitive populations and those with existing health problems are likely to be more susceptible to impacts from environmental toxins at Brownfields sites as well as other cumulative impacts identified in the region and Bangor in particular.

As stated above, this grant will clean up the lead, asbestos and PCBs at the Site therefore directly reducing these environmental threats to our low income, sensitive populations. Lastly, improving income has a direct correlation on improving health. Providing high paying jobs for our underserved community will lead to healthier outcomes and healthier lives for our community including jobs with health insurance will also lead to earlier detection of disease and the financial means to address adverse health conditions.

(3) Promoting Environmental Justice: As presented above, the target area contains disproportionately high percentiles of several EJ indexes (over 75th percentile compared to rest of the State) including PM2.5, Ozone, Air Toxics Cancer Risk, Respiratory Hazard Index and Superfund Proximity. It also contains very high impacts from environmental indicators (over 80th percentile compared to rest of State) for NATA Cancer Risk, Respiratory Hazard Index, Lead Paint Indicator, and Hazardous Waste Proximity. Our project will promote environmental justice by addressing both the Environmental and Demographic Indicators of EJ concerns. The project will eliminate environmental concerns related to hazardous substances through active remediation of the PCBs, lead and asbestos present at the Site. It will also create high paying jobs that will directly address the demographic indicator of Low-Income Populations.

B. Community Engagement

i. ii. Project Involvement and Project Roles
In addition to the programmatic and technical support provided by the Maine DEP and EPA the following project partners will also be leveraged:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Point of Contact</th>
<th>Description and Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bangor International Airport</td>
<td>Tony Caruso</td>
<td>Bangor International Airport Director. The Alert Building is wholly contained within the grounds of the BGR and airport staff will be an integral part to the remediation of this site. BGR will provide access to the site, site security, airport escorts, and public meeting space for community engagement events.</td>
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</table>

The site is wholly within Bangor International Airport property and due to FAA regulations, no outside organizations have access or use of the site. However, the Air National Guard is also a user of the Bangor International Airport runway – the Air National Guard accounts for numerous flights in and out of the airport on a daily basis. The remediation of this structure would benefit that entity as well.

iii. Incorporating Community Input

Our plan to engage the community through regular updates at City Council and Airport Committee meetings. In addition, two project specific meetings will be held during Airport Committee meetings. The first one will be held during the 30-day comment period on the Analysis of Brownfields Cleanup Alternatives (ABCA) in order to introduce the project to the public, review the alternatives evaluated and chosen, and solicit feedback on the conclusions and recommendations for the cleanup. The second meeting will be during implementation of the cleanup to update the community on the progress of the cleanup and ensure that any public concerns are understood and addressed. A multimedia approach will be employed to advertise meetings, encourage community participation and provide responses to community concerns, including announcements via local newspaper, e-mail, and Bangor’s website. Please note that 97% of residences in the target area speak English, therefore translation of material into other languages will be done only if needed. In addition, any other special needs (handicap, etc.) will be accommodated during the meeting; however, please note that there have been no previous communication (i.e., language) or participation (i.e., handicap) barriers associated with our past projects. If this does arise, Bangor will make every effort to accommodate these barriers and allow all people to participate. All public forums/meetings will be held online via Zoom or in the Bangor City Hall/BGR meeting room, and be held at a time where the working public will have opportunity to participate.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

A. Proposed Cleanup Plan

The draft ABCA and an application to the Maine Voluntary Response Action Program (VRAP), i.e., Maine’s VCP, have been submitted to the Maine DEP and are currently under review. It is expected that Maine DEP will issue a No Further Action Assurance Letter under the VRAP program in early 2022 approving the ABCA and cleanup plans. The ABCA prepared for the Site (included as Attachment 2) includes the removal of hazardous building materials including lead paint, asbestos, and PCBs through demolition and disposal. Where the building is severely dilapidated and unsafe to enter, abatement of these materials prior to demolition is not feasible. To the extent practical, inert (i.e., “clean”) materials such as unpainted concrete, metal, etc. will
be segregated during demolition for recycling. Due to the nature of hazardous building materials (i.e., PCB painted concrete, asbestos or PCB-containing mastics, asbestos tiles and roofing, etc.), the remainder of the demolition debris will be segregated as appropriate for disposal as either asbestos or PCB wastes at appropriately licensed landfills. Following demolition, the out-of-service fuel oil supply line identified at the Site will also be excavated and assessed for releases of petroleum to the subsurface. If petroleum releases are identified, soil will be removed for disposal/recycling.

Please note that each of these cleanup actions will be completed in accordance with Toxic Substances Control Act (TSCA) 40 CFR Section 761 (PCBs); Maine DEP Remedial Action Guidelines, and Maine DEP Chapter 425 (asbestos) rules and regulations. During cleanup activities and building abatement, engineering controls will be utilized, including area containment and perimeter air monitoring, dust suppression during demolition and soil removal activities, and the use of temporary barriers to protect airport workers during cleanup activities.

Environmental engineers will specify the appropriate handling and disposal of all hazardous materials and would continue to monitor the Site after cleanup is complete in accordance with Maine DEP and TSCA requirements. The building foundation and soil excavation areas will be backfilled with structural fill and compacted back to normal ground levels to support future construction of the warehouse and will be temporarily loamed and seeded to prevent runoff into BGR’s watershed. Once remediation is completed, a remediation summary report will be submitted to the Maine DEP VRAP to obtain a “Certificate of Completion.”

B. Description of Tasks/Activities and Outputs; 3.b.i, ii, iii, iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, & Outputs

<table>
<thead>
<tr>
<th>Task Activity: 1. Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td>i. Project Implementation; Discussion of EPA Funded Activities: Bangor will:</td>
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<tr>
<td>a. Form Steering Committee</td>
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<td>b. Competitively Bid Services for Qualified Environmental Professional (QEP)</td>
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<td>c. Quarterly ACRES Reporting including MBE/WBE Reports</td>
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<td>d. Attend Brownfields Conference</td>
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<td>• Non-EPA grant resources needed to carry out task/activity: None</td>
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<td>ii. Anticipated Project Schedule: Fall 2022 through Fall 2023; reporting ongoing</td>
</tr>
<tr>
<td>iii. Task/Activity Lead(s): Tyler Collins (Bangor)</td>
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<td>iv. Outputs: EPA Quarterly Reports, MBE/WBE Reports, RFQ</td>
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<tr>
<th>Task Activity: 2. Community Engagement</th>
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<tbody>
<tr>
<td>i. Project Implementation; Discussion of EPA Funded Activities: Bangor will:</td>
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<tr>
<td>a. Draft Community Relations Plan (CRP)</td>
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<td>b. Facilitate Quarterly Brownfield Advisory Committee Meetings</td>
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<td>c. Host Public Meeting for Draft ABCA</td>
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<td>d. Monthly Updates at City Council or Airport Committee Meetings</td>
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<tr>
<td>• Non-EPA grant resources needed to carry out task/activity: None</td>
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<tr>
<td>ii. Anticipated Project Schedule: Ongoing through Fall 2023 or project completion</td>
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<tr>
<td>iii. Task/Activity Lead(s): Tyler Collins (Bangor)</td>
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<tr>
<td>iv. Outputs: CRP, Advertisements, Sign in Sheets, Meeting Minutes, News Articles</td>
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<tr>
<th>Task Activity: 3. Cleanup Activities</th>
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<tbody>
<tr>
<td>i. Project Implementation; Discussion of EPA Funded Activities: Work will include:</td>
</tr>
</tbody>
</table>
a. Abatement of asbestos, lead, and PCBs by full component removal/demolition
b. Removal of the out-of-service fuel line
c. Removal and offsite disposal of contaminated soil, if encountered

• Non-EPA grant resources needed to carry out task/activity: None

ii. Anticipated Project Schedule: Spring/Summer 2023 (within 3-year grant period)
iii. Task/Activity Lead(s): QEP with support from City
iv. Outputs: Daily Construction Reports, Certified Payrolls, Waste Disposal Documents

Task Activity: 4. Site Closure and Closeout Documents
i. Project Implementation; Discussion of EPA-Funded Activities: Work will include:
   a. Drafting Analysis of Brownfields Cleanup Alternatives (ABCA), Quality Assurance Project Plan (QAPP), TSCA PCB Cleanup Plan, and Bidding Plans and Specifications
   b. Conducting Public Bidding of Cleanup
   c. Overseeing Remediation
   a. Submitting Remediation Summary Report

• Non-EPA grant resources needed to carry out task/activity: Conduct Pre-design Investigation to confirm soil quantities requiring disposal

ii. Anticipated Project Schedule: Fall/Winter 2023/2024 until project completion
iii. Task/Activity Lead(s): QEP
iv. Outputs: ABCA, QAPP, TSCA PCB Cleanup Plan, Bidding Documents, Remediation Summary Report, VRAP Certificate of Completion from Maine DEP

C. Cost Estimates

Based on prior project and contractor experience and current estimates received from contractors, the estimated cost all remedies listed above is broken down below:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Cooperative Agreement Oversight</th>
<th>Community Involvement</th>
<th>Cleanup Implementation</th>
<th>Site Closure and Closeout Documents</th>
<th>Total</th>
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<tr>
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<td>Supplies</td>
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<td>Cost Share (20% of requested)</td>
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<td>Cooperative Agreement Oversight</td>
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<td>Cleanup Implementation</td>
<td>Site Closure and Closeout Documents</td>
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<td>federal funds)</td>
<td>$10,125</td>
<td>$3,500</td>
<td>$578,725</td>
<td>$7,650</td>
<td>$600,000</td>
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Task I: Cooperative Agreement Oversight: This task will include $3,750 for programmatic management of the grant including procuring a QEP, quarterly reports, ACRES updates, and MBE/WBE reporting (75 hours at $50 per hour staff), and travel to the Brownfields Conference ($500 airfare RT, $150/night x3 nights hotel, $54/day x3 days meals, plus conference registration and other travel fees). The QEP will assist with grant oversight, reporting, ACRES, etc. at an estimate cost of $3,125 (25 hours at $125/hour).

Task II: Community Involvement: It is estimated that $1,250 will be necessary for Bangor personnel to facilitate advisory committee, public, and community volunteer/partner meetings (25 hours at $50 per hour), $1,250 for QEP time to finalize the ABCA and prepare the Community Relations Plan, QAPP, assist in community outreach, and participate at the BAC/public meetings (10 hours at $125/hour); $500 in supplies that will comprise a project sign, newspaper advertising, and presentation materials.

Task III: Cleanup Implementation: Preliminary estimates indicate approximately $500,000 will be necessary for the abatement and disposal of hazardous building materials and removal of the fuel line. As such, we have allocated $578,725 contractual for a cleanup contractor ($215,000 demolition, $45,000 foundation removal, $100,000 transport and disposal, $25,000 other cleanup requirements, and a 25% contingency of approx. $106,000) and $87,725 contractual for preparing a RAP, SSQAPP, engineering, design, bidding, performing on-site oversight and documentation, Davis Bacon compliance, and other laboratory/testing fees (560 hours at $125 per hour QEP plus $17,725 in laboratory and other expenses). Bangor will contribute at least $100,000 of cost share through direct expenditure to the QEP or cleanup contractors for hazardous materials abatement.

Task IV: Site Closure and Closeout Documents: Bangor will provide coordination and communications with the EPA and DEP and coordinate with the QEP to prepare a remediation summary report at an estimated amount of $1,000 (20 hours at $50 per hour). This task estimates $6,250 contractual for QEP time for preparing the remediation summary report and coordinating with DEP to receive a VRAP Certificate of Completion (50 hours at $125 per hour).

The entire cost share will be met by eligible sources that support the cleanup efforts of the Site and have been reflected above.

**D. Measuring Environmental Results**

If awarded the grant, Bangor will prepare a Cooperative Agreement Work Plan that will outline the overall project schedule, project budget, identify various work tasks, benchmarks, and milestones that will be tracked and measured during grant implementation. A QEP will be procured and be responsible for ensuring that all work is completed in accordance with State and Federal guidelines including Davis-Bacon compliance. Bangor and the selected QEP, as well as selected cleanup subcontractors will be in regular contact throughout the project to ensure the project
remains is on track/schedule, and meets the desired outcomes. Mechanisms for tracking, measuring, and evaluating progress and outcomes will be through EPA quarterly reports and regular updates of the ACRES database. By correlating the outcomes detailed in the Work Plan with cleanup planning documents, Bangor will ensure that all outcomes are effectively reported to EPA and the Maine DEP to receive a Certificate of No Further Action.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

A. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff

With nearly 400 full-time municipal employees and an annual budget of over $45 million, the City has sufficient staff capacity and experience to continue to implement a successful Brownfields program. The City provides a full range of municipal services ranging from Police and Fire, to an international airport, to health and welfare, to planning and economic development. The City receives over $10 million each year in grants from State and Federal agencies, including EPA, HUD, FAA, DOT and others. There are well defined and stringent management protocols, systems and oversight in place. Both procurement and payment systems are formal and structured. The City has a strong history of smart and effective competitive procurement of technical, professional and creative services, including engineering, legal, research, marketing and planning services. The QEP selected to work with the City on this project will be hired through our prescribed bid process. The project will be managed by Tyler Collins, Community and Economic Development Officer, and Tony Caruso, the City’s Airport Director. Their biographies are below.

Tyler Collins, Community and Economic Development Officer: Mr. Collins has managed our current and past Brownfields Assessment grants, Brownfields RLF subgrants for the Building 487 cleanup, and has managed many other projects with complex constituencies and funding streams. Prior to joining the City, he managed a successful Brownfields program at Eastern Maine Development Corporation where he oversaw an inventory of over 36 sites, the completion of 8 Phase Is and 9 Phase IIs. Mr. Collins has approximately 17 years of experience managing operations and initiatives within the public sector including arts and culture, education, economic and community development.

Tony Caruso, Airport Director: Anthony P. Caruso Jr., C.M. was appointed as the Bangor International Airport Director in July of 2012. As the Airport Director, he is responsible for the management of our international, non-hub, commercial and military joint-use airport. He oversees the day-to-day operations of the airport, is responsible for the budget, business development for the airport, participates in community outreach, and is the airport spokesperson. In addition to being an FAA licensed Private Pilot, Tony holds a Bachelor of Science degree from Bridgewater State University in Aviation Science with a concentration in Airport Management and is a Certified Member of the American Association of Airport Executives. Tony has expertise in airport, airline and FBO management

iii. Acquiring Additional Resources

Bangor believes in a competitive procurement process and will issue a Request for Qualifications (RFQs) to solicit QEP responses. The RFQs are reviewed by BGR and City staff and interviews of the top submittals/qualified firms are generally conducted. The selection of a QEP will provide Bangor with the technical expertise and resources to achieve success and complete this wonderful project. In addition, the specific cleanup work will be publicly bid by the QEP. If other resources are needed, such as legal support in the development of institutional controls, the City retains legal
stuff on a contract basis and other qualified vendors that can utilized.

**B. Past Performance and Accomplishments; i. Currently Has or Previously Received an EPA Brownfields Grant**

**(1) Accomplishments**

Under our current and prior Brownfields Assessment grants, we have inventoried over 30 high priority sites in the City, completed Phase I assessments on ten sites, Phase II assessments on ten sites, cleanup planning activities on four sites, and other preliminary environmental work on five additional sites including the Pike Industries, Bangor Riverwalk, Old Town Canoe, Grants Dairy and Banana Building Sites. All completed outputs are accurately reflected in ACRES. We have convened a steering committee, and have developed effective working relationships with leaders in our community, the greater Bangor regions, and the State of Maine. A specific example would be our work on Building 487 on Polk Street in Bangor. Collaborating with Eastern Maine Development Corporation (EMDC), a local economic development entity, we used EMDC Brownfields assessment funding to do an initial Phase I ESA. We used our own funding to complete a Phase II ESA and cleanup planning for the site. Then we collaborated with the Maine DEP and received a grant from the Maine Department of Economic & Community Development to complete the remediation of the site using Brownfields RLF funding. The site was ultimately redeveloped into an existing lease with General Electric on an adjoining property and is currently being used for equipment staging and are planning to add new infrastructure in the immediate future. So far, the Building 487 project alone has leveraged over $4.5 million in new lease revenues and private investment to the City, and our program as a whole has leveraged approximately $6 million in total to date.

**(2) Compliance with Grant Requirements**

Bangor received its first $400,000 EPA Brownfields Community-Wide Assessment Grants for Hazardous Substances and Petroleum in 2014 and a second grant for $200,000 in 2017. Approximately $122,795 remained in the 2014 grant at closeout due to limited inventoried sites meeting petroleum eligibility criteria within the City. The current grant period began in October 2017 with a period ending in September 2020; however, the grant period was extended to September 2022 due to delays related to COVID-19 and the highly active real estate market in Bangor, which has absorbed many of our targeted sites. Approximately $60,000 remain in the current grant and we are currently conducting community outreach and updating our site inventory to expend the remaining funds on additional assessment and planning activities. We have consistently followed our Cooperative Grant Agreement terms and conditions as well as our Work Plan commitments, and we have successfully completed, financial status reports, Quarterly Reports, MBE/WBE reports on time as well as regularly updated ACRES.
ATTACHMENT 1

THRESHOLD CRITERIA
ATTACHMENT 1: THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility
The City of Bangor, Maine (City) is a general-purpose unit of local government.

2. Previously Awarded Cleanup Grants
The City has not previously received an EPA Brownfields Cleanup Grant for the proposed site.

3. Expenditure of Existing Multipurpose Grant Funds
The City does not have an EPA Brownfields Multipurpose Grant; therefore, this is not applicable.

4. Site Ownership
The City is the owner of the Site and the Bangor International Airport (BGR).

5. Basic Information
   a. Site Name: Building #610 (Alert Building), Bangor International Airport
   b. Site Address: Bangor International Airport, 287 Godfrey Blvd., Bangor, Maine 04401
   c. Current Owner: City of Bangor, Attn: Bangor International Airport, 287 Godfrey Blvd., Bangor, Maine 04401

6. Status and History of Contamination at the Site
   Type of Contamination: Based on the cumulative results of previous environmental investigations performed at the Site, the following COPCs have been identified:
   - Asbestos
   - PCBs
   - Lead
   - Mold
   - Universal and other regulated waste

   Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), heavy metals, petroleum, and per- and polyfluoroalkyl substances (PFASs).

   Operational History and Current Uses: The Site comprises an approximate 1.31-acre portion of the larger BIA Property, located in the southern portion of the airport south of an unused taxiway and aircraft stands. While the Site has not been formally subdivided from the BIA Property, the City intends to construct a state of the art temperature controlled international warehouse facility.

   The Site building reportedly featured a command center, living quarters, common areas, and a mess hall when it was operational. The multi-story concrete block structure is comprised of one above-ground floor, and two below-ground floors, including a basement, and a sub-basement that houses the building’s boiler room. In addition, 11 concrete access ramps extend out from the Site building, which provided pilots rapid access to aircraft nearby. The building was once serviced by underground utility lines such as heating oil, water, and sewer, which remain in place but inactive.
The Site building has been vacant and unmaintained since 1968. As a result, the structure is severely dilapidated and no longer safe to enter due to collapsed roofing components, observed presence of mold throughout, building debris throughout, and various damage resulting from exposure to the elements. Additionally, the sub-basement boiler room is typically flooded with water, as observed during past Site visits, making it entirely inaccessible.

**General Airport History:** BIA was first developed in 1927 as part of Godfrey Field, a municipal airport for the City, until a lease agreement was signed with the U.S. Army to construct facilities for the 43rd Bombardment Group. In 1942, the installation was officially referred to as Dow Army Airfield. By 1943, the Federal government acquired 750-acres surrounding the airfield by condemnation and/or purchase. The deed contained a clause reverting ownership back to the City when the Federal Government no longer needed it for military purposes.

During World War II, the Army Air Corps used the airfield as a major point of embarkation and debarkation for planes flying to and from Europe. The airfield was renamed Dow Air Force Base (AFB) in 1947. The base was initially deactivated in 1948 and was returned to the City under a license agreement. In 1951, Dow AFB was reactivated, and its use included the Strategic Air Command, the Tactical Air Command, and the Air Defense Command. In 1964, Dow AFB was declared excess and was reported to the General Services Administration for disposal when military operations ceased in 1968. A deed dated December 18th, 1968, conveyed 1,590 acres and extensive easement areas of the former AFB to the City. The deed restricted the use to public airport purposes, and it has remained a public airport since then. Generally, the airport area surrounding the Site has remained consistent from at least 1973 through the present.

**Site Building History:** The Site building was built sometime after the opening of Dow Army Airfield in 1942, and before the closure of Dow AFB in 1968. It served as aircraft pilot living quarters and rapid response facility in the event of a national security threat. As indicated above, during former operations, the building featured a command center, barracks, common areas, and a mess hall.

Once Dow AFB closed in 1968, the City regained ownership of the Site and the Site building was abandoned, and has remained so since 1968. In the late 1800s, Thompson's Point was originally developed as a railroad yard for the Maine Central Railroad. Lot 7 itself was occupied by railroad tracks for moving train cars in and out of the adjoining maintenance sheds. Adjoining buildings were originally constructed prior to 1909 and were used as machine shops, train car repair, and for planning. Railroad use continued through the 1930s, and by the 1940s, other industry had moved into the adjoining buildings including an ordnance plant; however, the Site continued to be occupied by railroad tracks. From the 1960s through the 1980s, the tracks were removed from the Site and a variety of industrial and commercial business occupied the adjoining buildings. Most of the undeveloped portions of the peninsula, including the Site, were used for storage of various materials and stockpiling. Thompson's Point is currently in the process of being redevelopment into a mixed-use commercial, retail, entertainment, and residential site. Previous environmental assessment work for Lot 7 (the subject of this grant application) is currently contaminated with polycyclic aromatic hydrocarbons (PAHs), metals and limited residual petroleum with limited exposure resulting from former rail and manufacturing operations and require remediation as part of the redevelopment. (Petroleum contamination not targeted for cleanup under this grant).

**Cause and Nature and Extent of Contamination:** COPCs at the Site include asbestos, lead, PCBs, and mold, found in building materials in/on the Site building. Under current conditions, exposure to contamination at the Site is limited, as the Site is currently vacant and in a restricted area (within
an active airport property). Remediation and demolition workers could also potentially be exposed to asbestos, lead, PCBs, mold, and certain components of universal wastes within the Site building if health and safety precautions are not practiced. The building is in a dilapidated state and asbestos, lead, PCBs, mold, and universal and hazardous wastes have the potential to have been and be mobilized through further building degradation or elemental exposure. In addition, the sub-basement boiler room of the building has been flooded and is suspected to contain VOCs, SVOCs, heavy metals, and/or PFAS that requires proper management and disposal to prevent future releases to the environment.

7. **Brownfield Site Definition**
The Site meets the definition of a Brownfields property as it is a *real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of hazardous substance, pollutant, or contaminant*. Additionally, the Site is not listed or proposed to be listed on the National Priority List; is not currently subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to jurisdiction, custody, or control of the United States Government.

8. **Environmental Assessment Required for Cleanup Grant Proposal**
The following environmental site assessments were completed for the Site:
- Phase I Environmental Site Assessment, Credere, May 28, 2015
- Supplemental Research, Credere, June 2015
- Site-Specific Quality Assurance Project Plan, Credere, August 20, 2015
- Phase II Environmental Site Assessment, Credere, January 27, 2016

9. **Enforcement or Other Actions**
There are no known ongoing or anticipated environmental enforcement actions related to the site for which Brownfields grant funding is sought.

10. **Sites Requiring a Property-Specific Determination**
The Site does not require a property-specific determination because it is not: (a) involved in a planned or ongoing CERCLA removal action; (b) subject to unilateral administrative orders, judicial consent decrees, or permits issued under RCRA, FWPCA, TSCA, or SDWA; (c) undergoing active or planned corrective actions required under RCRA; (d) subject to the closure requirements under RCRA; (e) under current or potential future remediation orders to address a release of PCBs; or (f) receiving or anticipated to receive monies for cleanup from a LUST trust fund.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability**

a. **Property Ownership Eligibility – Hazardous Substance Sites**

   iii. **Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability**

   (1) **Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002**
   Per CERCLA § 104(k)(3)(E), if an applicant that is a public entity (such as a state or local government) acquired property prior to January 11, 2002, the applicant is eligible for a Brownfields
Grant and may use grant funds to address contamination at the property, even if the entity does not qualify as a bona fide prospective purchaser, provided the applicant did not cause or contribute to the release or threatened release of a hazardous substance at the property. **Provide the following information to demonstrate that the applicant qualifies for the exception at CERCLA § 104(k)(3)(E):**

(a) Describe in detail the circumstances under which the property was acquired.
   The Site was historically used by the U.S. Air Force as a rapid response building for aircraft (e.g. B-52s, etc.). However, Dow Air Force base closed in 1968 and the Government conveyed 1,590 acres of land from the former AFB to the City. Since that time, the building has been abandoned and is in severe disrepair; the City has never used the building for any purpose.

(b) Provide the date on which the property was acquired.
   The property was acquired/conveyed to the City on December 18th, 1968, by deed.

(c) Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
   The City has not operated the Site since 1968 and all disposal of hazardous substances occurred prior to conveyance in 1968.

(d) Affirm that you have not caused or contributed to any release of hazardous substances at the site.
   The City has not caused or contributed to any release of hazardous substances at the Site.

(e) Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
   The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substance to the site.

12. **Cleanup Authority and Oversight Structure**

(a) Cleanup Oversight: The Maine DEP will provide technical review and comment on all plans, reports, and activities pertaining to cleanup of the Site. As required, the site will also be entered in the Maine DEP Voluntary Response Action Program, i.e. Maine’s VCP. The City will also hire a Qualified Environmental Professional (QEP) prior to implementing remediation activities at the Site. The QEP will obtain and evaluate remediation contractor bids, coordinate and oversee remediation activities, and document the remedial actions pertinent to the Covenant Not to Sue and Brownfields Program, ABCA/RAP, and other cleanup documents. The City’s procurement procedures will be consistent with 2 CFR 200.317 through 200.326.

(b) Adjacent Property Access: Access to adjacent properties will not be required during the cleanup as the site is within the bounds of an airport and ample space is available for site work.

13. **Community Notification**

a. **Draft Analysis of Brownfields Cleanup Alternatives:** An ABCA was prepared on November 8, 2021, and will serve as the Draft ABCA for this Cleanup Application. The ABCA describes Site contamination, cleanup goals, and regulatory guidelines. It identifies applicable presumptive cleanup requirements and evaluates cleanup alternatives for the Site based on the effectiveness and resilience to a changing climate, feasibility of implementation, cost, and time, and also considered the
potential for green remediation options. The alternatives are compared against a baseline of taking No Action. In consideration of the condition of the building and conceptual site model (CSM), whole component removal and disposal has been identified as the selected remedial alternative. ‘No Action’ cannot be recommended because it does not mitigate the risks posed by contaminants at the Site considering that the property will be redeveloped.

b. Community Notification Ad: To support this Cleanup Grant application, the draft ABCA was made available again for public comment from November 13, 2021, through November 27, 2021. The community was notified of the comment period, ABCA, a public meeting, and cleanup grant application through a public notice published in the Bangor Daily News on November 13, 2021. The ABCA document, the draft application, as well as previous environmental assessment documents for the Site, can be reviewed at the City of Bangor, Economic Development Office, 73 Harlow St., Bangor, Maine 04401.

c. Public Meeting: A Public Meeting concerning the draft ABCA and on the proposed demolition and remediation of the Alert Building was held on Tuesday, November 23, 2021, at 11:00 AM at the Amelia Earhart Conference Room, 287 Godfrey Boulevard, Bangor, Maine 04401. Public comments on the draft ABCA and on the proposed remediation were accepted at this meeting.

d. Submission of Community Notification Documents: The required documentation including the draft ABCA, a copy of the Public Notice, a summary response to public comments, and the meeting notes, and the meeting sign-in sheet are included in Attachment 2.

14. Statutory Cost Share
   a. The City recognizes that a $100,000 cost share is needed to support this $500,000 grant request and $100,000 has been allocated in the Bangor International Airport’s capital improvement budget for 2022.
   b. The City is not requesting a hardship waiver.