



ROI-24-A-020

Old Town

265 MAIN STREET * OLD TOWN, MAINE 04468-1497

Narrative Information Sheet
EPA FY2024 Brownfields Community-Wide Assessment Grant Application
City of Old Town, Maine

1. Applicant Identification: City of Old Town, Maine
265 Main Street
Old Town, Maine 04468-1497
2. Funding Requested
 - a. Assessment Grant Type: Community-Wide
 - b. Federal Funds Requested: \$500,000
3. Location
 - a. City: Old Town
 - b. County: Penobscot County
 - c. State: Maine
4. Target Area and Priority Site Information
 - a. Target Areas: Main Street and Stillwater Avenue
 - b. City of Old Town
 - c. Address of priority site(s): **ND Paper Mill**, Portland Street, **Industrial/Auto Repair Site** at the corner of South Main and Chester Street, **Penobscot Nation-Machine Shop/Metal Fabrication Site**, 46 Center Street
5. Contacts:
 - a. Project Director: Bill Mayo, City Manager, 265 Main Street, Old Town ME 04468-1497; 207-827-3965; bmayo@old-town.org
 - b. Chief Executive/Highest Ranking Official: Danielle Berube, Finance Director, 265 Main Street, Old Town ME, 04468-1497; 207-827-3965; dberube@old-town.org
6. Population: The City of Old Town has a population of 7,431 (2020 Census).

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	2
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2
The reuse of the priority site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B. , for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from State DEP Acknowledging Old Town's Application: Attached



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

October 24, 2023

City of Old Town
Attn: Bill Mayo
265 Main Street
Old Town, ME 04468-1497

Dear Bill Mayo:

The Maine Department of Environmental Protection (Department) acknowledges that the City of Old Town plans to conduct assessments of brownfields sites and is applying for an FY24 Environmental Protection Agency (EPA) Brownfields Assessment Grant.

Bill Mayo of the City of Old Town has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the City.

If the City of Old Town receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, quality assurance plans, and health and safety plans. For sites where cleanup is pursued, the Department's Voluntary Response Action Program (VRAP) staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight, as necessary, of their 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) 215-8597 should you have any questions regarding this letter.

Sincerely,

Christopher Redmond
Department Brownfields Coordinator
Voluntary Response Action Program Manager
Bureau of Remediation and Waste Management, Division of Remediation
Maine Department of Environmental Protection

cc: Katy Deng, EPA Brownfields Region 1

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
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PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfields Challenges and Description of Target Area

The City of Old Town was historically considered a mill town located at the confluence of the Stillwater and Penobscot Rivers and is the geographic boundary for this grant. The City of Old Town's preliminary 2023 Brownfields inventory identified ten (10) potential sites in the Main Street/Downtown and another eight (8) potential sites within the Stillwater Avenue Corridor, an area leading into downtown Old Town from the City's outskirts. This grant application's overall **Target Area includes Main Street and Stillwater Avenue**, two areas that are known to have been negatively impacted by existing Brownfields, their associated blighted, underutilized structures, and impacts on those who live and work in or nearby these areas.

The decline in Old Town has been directly related to the existence of Brownfield sites. **The combination of former mill and industrial site buildings, vacant sites, and the devastating shutdown of the Nine Dragons (ND) Paper Mill in 2023 that left over 150 workers unemployed, the Expera Mill shutdown in 2015 that left over 195 millworkers unemployed and the Georgia Pacific Paper Mill shutdown in 2006 that left 400 millworkers unemployed, have systematically weakened downtown business activity. In 2009, Old Town Canoe announced it was abandoning its mill site for a consolidated operation located on Gilman Falls Avenue.** We estimate the total Main Street (our Main Street is in a federally designated flood plain) and Stillwater Avenue area consumed by Brownfields sites to be over 200 acres. Old Town reportedly has 400,000 square feet of unused building space in and around the Target Areas. Main Street and Stillwater Avenue were developed to serve **industrial mills built along the Stillwater and Penobscot Rivers** in the early 1800s. The economic development of Old Town began in 1798 when Richard Winslow built a water-powered sawmill near the present Main Street/downtown, and by 1860, Old Town was the largest supplier of lumber in the United States. The Old Town Canoe Company organized around 1900 and began building canoes in the center of the downtown. By 1937 the great depression closed most of the woolen mills, with the last one closing in the late 1960's. By 1970, the last woolen mill closed its doors, and several shoe shops closed. The legacy of these industrial facilities and factories date back to an era when these rivers, which intersect near downtown Old Town, were used as an open sewer for industrial waste disposal. Old Town's industrial past is reflected in the mills, dams, and factories that line the riverbanks of the Penobscot River on Main Street and in the downtown. Today, many former mill workers have left Old Town; many of those who remain work in Bangor.

Old Town neighborhood communities feature traditional millworker housing, much of which remains modest and poorly maintained due to the community's poverty and low property value around our Brownfields sites. The high paying job losses associated with the paper mill operations have been replaced with lower paying jobs; this has led to an increased poverty rate. **The vacant mill buildings described above are located in our Target Area**, are neglected and in various states of disrepair, and currently have a negative impact on human health, the environment, and public welfare. The City's most sensitive populations are living in or in close proximity to these sites, and without assessment funds, the City does not have the means to cleanup or redevelop these sites. This grant will provide much needed support to the community towards revitalization.

ii. Description of the Priority Brownfield Site(s)

All of the Brownfield Sites identified in our preliminary inventory are located in the two Target Areas and are surrounded by residential neighborhoods. The former ND Paper Mill is located on **Portland Street on the banks of the Penobscot River**. A portion of the City's prior Brownfield Assessment grant has been utilized to start assessment on this site but with the 2023 shutdown more work is needed. This 150-plus acre site with building footprints covering over 25 acres was first developed as a paper mill in the late 1800's and is our largest and most complex Brownfield site. This property has asbestos, lead-based paint and other hazardous and petroleum contamination identified in soil and is located in a residential area of the Main Street Corridor Target Area. Unmitigated contamination at this Site poses a risk to residents, trespassers and the environment, including the adjacent Penobscot River.

The Brownfields .5-acre Site located on the corner of South Main Street and Chester Street (building footprint estimated at 5,000 sqft) in our Main Street Corridor Target Area, exemplifies a manufacturing/industrial site that historically also conducted automobile repair and is in need of hazardous and petroleum substances Brownfield assessment funds. The site is immediately adjacent to Main Street and is in close proximity to the Penobscot River. This site has had various uses over time including cabinet manufacturing and automotive maintenance. Given the age and history of the buildings, they likely contain asbestos, lead-based paint, petroleum storage tanks, and other hazardous materials.

Old Town will partner with the Penobscot Indian Nation, which lies adjacent to the City, to assist with assessments that may be needed on reservation lands. **Our inventory identified one Penobscot Nation-owned machine shop/metal fabrication site situated on the banks of the Penobscot River (46 Center Street)** that will be included in this assessment program. This site was formerly used as a metal machining facility and waste material (stainless steel) can be seen embedded in the riverbanks and on the river bottom.

iii. Identifying Additional Sites

The enormity in scale associated with potential contamination and environmental issues associated with the ND Paper mill and Maine Street and Stillwater Ave. properties, is overwhelming; to date, these brownfield sites have not been sufficiently characterized. A Brownfields Program is vital for Old Town to conduct subsurface investigations and Hazardous Building Materials Inventories (HBMIs) to properly assess and evaluate the priority Brownfield Sites to determine the extent our sensitive populations living and working in the Target Area are exposed to contamination. Old Town is an underserved community so we anticipate all sites selected for inclusion in the program to benefit our disadvantaged population.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The ND Paper Mill site and some of the outlying parcels that are associated with this site are perfect examples of a former industrial site that will be redeveloped consistent with the communities Comprehensive and Downtown Development Plans (Comp Plans). Old Town's redevelopment strategy is to renovate and redevelop existing mill structures and industrial sites, which were once the economic and geographic centerpieces of the community, into central pillars of the new local economy: multi-use commercial, industrial, and residential areas that will catalyze growth in the downtown center; create jobs and encourage capital investment; beautify Old Town's walkable downtown neighborhoods; and significantly increase the local tax base.

Old Town's Comp Plan engages the community to develop a strategy to move our City forward by encouraging infill and redevelopment of our Target Area Main Street and Stillwater Avenue Brownfield sites; by developing open space along the Penobscot River; by encouraging the creation of green space; by utilizing vacant upper stories of commercial buildings as affordable residential apartments; and by the redevelopment of the ND Paper (commercial/industrial) and former Old Town Canoe site (hotel/conference center). The City held three public meetings to discuss these plans, and interest and participation was high. Part of the Comp Plan is identifying funding sources locally such as our Revolving Loan Fund, Facade Program, and establishing a Downtown Tax Incremental Financing District to supplement the Stillwater Avenue TIF District to encourage and finance development.

Our Brownfields Advisory Committee (BAC) will work with neighborhood groups, site owners, municipal/community leaders, and local businesses during future assessment and cleanup to design a reuse/redevelopment project with maximum benefit to current residents and the public through new jobs, expanded tax base, increased property value, creating open space and environmental protection.

ii. Outcomes and Benefits of Reuse Strategy

The redevelopment of our largest Brownfields site (ND Paper Mill) would immediately increase our tax base by 10-15%. We will emphasize the importance of energy efficiency, green remediation, solar installations on buildings, water management, and climate mitigation measures. Consistent

with our Comp Plan and reuse/redevelopment plans redevelopment will invite sprawl-free new business and employment opportunities.

Beyond our priority site mentioned above, Old Town has 400,000 square feet of unused building space in and around the Target Area, which is well-suited to redevelopment for light manufacturing operations, upscale office space, and business incubation space, uses that will infuse tax base and job opportunities (10-20 jobs per site) in the downtown along with mixed residential use. The entire area is within close proximity and walkable to the library, City Hall, shops, restaurants, and our riverfront parks. As an example of the benefits of redevelopment our Brownfields grant would help leverage, our community leaders and the Old Town Development LLC identified the Downtown Business District as an economic development priority and have reserve money available to assist in redevelopment of our Brownfield sites. This area of downtown is currently zoned commercial, and has the City Park, City Hall and also has a niche for small shops and businesses. The Old Town Development, LLC established a revolving loan fund for existing and new businesses in this district. Other examples of trying to improve this area are the City's work on the Downtown Plan, Facade Program, and Downtown Tax Incremental Finance District.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

If additional work (e.g., assessment) is required to complete tasks, the City will seek supplemental funding from sources including the EPA Region I Targeted Brownfields Assessment Program (TBA), Maine Department of Economic and Community Development (DECD) Brownfields Revolving Loan Fund, and Maine Department of Environmental Protection (MEDEP) and Eastern Maine Development Corporation's Brownfields Assessment Program. **The City also has funds currently available through the Old Town Development, LLC/Urban Development Action Grant (U.D.A.G) in reserve of \$326,000 & City Fund Balance reserve of \$84,000 totaling \$400,000 that can be used as funding for development.** In addition, the City plans to seek matching funds from municipal (such as Tax Increment Financing [TIF]), state (CDBG), and federal sources (appropriations) in order to obtain the total amount required to complete the project. The City has obtained funds from all of the above sources in the past and is confident that if needed, they will be available to this project.

Several lending institutions are located in Old Town and have agreed to support developers interested in redeveloping Brownfields. These institutions include the Old Town Development, LLC, which has established a revolving loan fund for existing and new businesses; as well as the Old Town Housing Authority, which will assist in the process of bringing prospective housing and commercial developers to Old Town.

Additional funds will likely be required for cleanup and redevelopment. The specific amount required for additional phases is currently unknown but will be developed in the Remedial Action Plan and Reuse Planning portion of the Assessment process. The City intends to leverage all that it can through work with its State delegates on supplemental grants, earmarks, and other funding, and with potential developers to obtain private funding, to fund assessment, economic development, and cleanup activities. Previously Old Town successfully wrote and managed three FY 2012 EPA Brownfields Cleanup Grants for the former Old Town Canoe site and is ready to do the same for other sites requiring remediation.

ii. Use of Existing Infrastructure

The ND Paper site is served with the infrastructure associated with a large pulp manufacturing facility including, water, power, natural gas, and steam. All this infrastructure is currently going unused but will be brought back on-line with the eventual redevelopment of this important site (anticipated to be privately funded). In 2017 Old Town was selected to participate in a Federal Opportunity Zone Program. This new economic development program provides a federal tax incentive for taxpayers who invest unrealized capital gains into so-called "Opportunity Funds," dedicated to investing in established "Opportunity Zones."

Old Town is a partner in the "Three Ring Binder Project," which is an effort to provide high speed fiber optic network to bolster existing businesses that can take advantage of the connectivity. This project will attract new businesses, entrepreneurs, University students and recent graduates to create new enterprise that rely on the high-bandwidth connectivity in our Target Area. In

2017/2018, the University of Maine at Orono (the town of Orono abuts Old Town) entered into conversation with prospective mill developers (the development team prior to ND Paper) to have steam generated on the mill site and piped to the University campus to supply their heating and power needs. There is potential for these discussions to reoccur with the redevelopment of this site.

The City is intent on the reuse/redevelopment of the former Old Town Canoe site into uses that will draw people to our downtown. This site is currently serviced by public utilities and high-speed broad band and is located in the center of the City and within walking distance of all of our amenities (library, shopping, restaurants, etc). We are looking for opportunities that take advantage of the site's size and have multiple uses including housing, lodging, and commercial/retail space. The City has engaged with several developers and conducted a feasibility study on behalf of a hotel developer. The development team will benefit from the current infrastructure servicing the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Old Town once enjoyed a vibrant industrial base in the downtown area. By the 1960's, most of what remains are vacant buildings. During the past 40 years, the City has made a concerted effort to "make over" the downtown. The current Downtown Plan and our updated Comp Plan have been used as tools to accomplish this goal. However, Old Town has a **small population base 7,431 (2020 U.S. Census) and is projected to decrease -13.5% between 2020-2040, with low-income residents the community relies heavily on partnership grant funding in order to plan and implement economic development projects.** Our Main Street and Stillwater Ave census tracts are in the 97th and 82nd respectively (state) percentile for low-income populations. The median household income of the city is \$43,474 compared to \$63,182 in the state and \$69,021 country. We are not an entitlement community, which requires our grant funding to come through a competitive application process. Pressures to keep local tax burdens low, in light of significant low-income populations with limited expendable income, limit the City's ability to raise funding for economic development through municipal tax revenue which limits City funding for economic development to money raised via municipal Tax Increment Financing (TIF) Districts. **The community does not have the capacity to fund assessments, remediate, or redevelop our Brownfield sites in our Target Area given the density and number of former industrial sites and the high number of historic buildings in the community in need of assessment. The ND Mill shutdown represents over 3.5 million in lost tax revenue to the City of Old Town.**

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

According to EJSCREEN, Old Town CDP that includes both our Target Areas has a high number of low-income population (71st percentile nationally, 79th in state), children under age 5 (64th percentile nationally, 74th in state) and over age 64 (52nd percentile nationally), along with persons with disabilities (76th percentile nationally). Other significant sensitive populations live in and adjacent to our Brownfields sites as evidenced by the fact that the Old Town Housing Authority and Volunteers of America own four elderly apartment complexes along the Penobscot River/Main Street corridor where Brownfield sites have been identified. There are 184 apartment units in these four buildings along with residential homes and apartments.

The Brownfield sites within our Target Area have also contributed to the overall economic decline of the surrounding community-they prevent redevelopment of urbanized land and exacerbate existing sprawl and housing development on former farm, forest, and other crucial open land tracks in rural areas. They prevent job creation and limit affordable housing options and economic growth for our sensitive populations. This grant will facilitate the advancement of the redevelopment of sites that will be characterized and moved towards reuse that will promote the health and welfare of our sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Our sensitive populations in our Target Areas experience greater than normal incidence of disease and are negatively impacted by contaminated sites as provided below:

- **Higher rates of asthma:** The Penquis Public Health District (‘Penquis,’ a combination of Piscataquis and Penobscot Counties) had an 11.0% child asthma rate in 2012, the highest rate in the State of Maine. According to EJSCREEN, Old Town is at the 93rd national percentile in terms of asthma rates.
- **Higher rates of cancer:** Old Town’s incidence rate for all types of cancers from 2008 to 2010 was 521.5 per 100,000, significantly higher than that of Maine (496.6 per 100,000). During a very similar time period (2006-2010), the mortality rate for all cancers for Penquis District only was 194.7 per 100,000 (the highest among all Maine counties), compared to 187.7 per 100,000 for the State¹.
- **Elevated blood lead levels in young children (0-12 months):** During 2003 to 2007, 2.1% of the young children in Penobscot County that had been tested for lead were found to possess elevated blood lead levels. This was the 5th highest rate among Maine’s sixteen counties². During a very similar period of time (2003-2006), 1.58% of young children in the U.S. who had been tested for lead were found to possess elevated blood lead levels³. Lead paint indicators are in the 80-90th percentile, and toxic releases to air are in the 80-90th.

Over 200 acres of potentially contaminated hazardous and petroleum impacted Brownfields property exists within the city limits. These adverse health statistics of sensitive target populations are believed to be attributed to the presence of contaminants at our Brownfield sites. Key indicators include Air Toxics Cancer Risk, Toxic Releases to Air, Lead Paint, Hazardous Waste Proximity all exceed the 80th percentile (State). Left unmitigated, these sites will contribute to an incremental population risk above and beyond that already being experienced by the disadvantaged populations. These unused urban sites are blighted vestiges of the city’s industrial past—long-vacant buildings with broken windows, structural failure, and evident decay—and contain asbestos, lead-based paint, and most are heated with petroleum. **The buildings themselves present absorption and inhalation threats that will be abated and mitigated through this assessment grant and subsequent cleanup.**

(3) Environmental Justice

a. Identification of Environmental Justice Issues

Old Town’s sensitive populations live in substandard housing, characterized by hazardous building materials such as lead paint and asbestos. The Target Area has some of the oldest housing stock in America. *Our sensitive populations, many of whom are elderly, disabled, and low-income pregnant women and children, are living in homes which may be contaminated with lead and asbestos-contaminated particulates and poor indoor air quality, which may be contributing to asthma and cancer rates.*

Brownfields have created environmental justice challenges which have resulted from past industrial, governmental, and commercial operating policies which caused a cycle of disinvestment and poverty. Former gas stations, drycleaners and light industrial properties located along Maine Street and Stillwater Ave. once provided jobs, security, and financial contributions, but are now contaminated relics which are a drain on the City’s economy, environment, and demographics as reflected in the EJ indices. Our census tracts are above the 70th percentile (State) for the EJ Index for Hazardous Waste Proximity and underground Storage tanks. This illustrates the legacy pollution and contamination left behind that burdens EJ populations to this day. The Target Area is left with relatively no job opportunities and a diminished population. These impacts have disproportionately impacted low-income families, especially our children and aging populations and created a significant environmental justice issue. This grant and reuse strategies will advance environmental justice and minimize the displacement of residents and/or businesses among the underserved community(ies) in the target areas.

According to EPA’s EJSCREENINGTool and EnviroAtlas, our Target Area has an aging population over age 64 in the 90-95th percentile, 90-95th percentile have less than a high school

¹ Maine Annual Cancer Report, June 2013 & 2013 Maine State Profile of Selected Public Health Indicators

² Maine Center for Disease Control and Prevention

³ CDC National Surveillance Data & 2010 Maine State Profile of Selected Public Health Indicators

education, the lead paint indicators are in the 80-90th percentile, and toxic releases to air are in the 80-90th when compared to Maine and the nation.

b. Advancing Environmental Justice

The assessment grant will identify subsurface pollution caused by volatile organic compounds (VOCs) from dry cleaning solvents and petroleum from the dry cleaners and gasoline/service stations. This information will allow the City to identify potential vapor intrusion hazards into Target Area buildings that are occupied by underserved residents, and to work to mitigate such hazards. The Target Area’s revitalization, spurred by Brownfield assessment and redevelopment, will bring jobs and people back to Old Town, spurring economic development and improvement of health care services, opportunities, and amenities. These services will benefit those individuals who were impacted, displaced, and marginalized by the devastating mill closure. We will prioritize locally owned businesses and includes a mix of market-rate and workforce housing as anti-displacement strategies, along with robust community engagement that ensures final redevelopment aligns with the priorities of our residents and low-income population.

b. Community Engagement

2.b.i Project Involvement & 2.b.ii Project Roles

The City has been actively engaged with key community organizations below (some will be part of our BAC) about this Brownfield Assessment program and will continue to work with them for the duration of the project. The following organizations have agreed to work with the City and its Qualified Environmental Professional (QEP) in a public outreach and education role concerning the health and environmental impacts arising from identified risks at the Sites, as well as imminent hazards posed by contamination found there. They will also conduct activities such as the dissemination of outreach materials, hosting public meetings, and assisting with press releases, taking advantage of the close connections they have with the local community. The City will promote strong labor practices, local hiring/procurement, and link members of the community to potential employment opportunities in Brownfields assessment, cleanup, and redevelopment related to our projects in a meaningful and equitable way. Our community partners/stakeholders will provide meaningful support and guidance, noted below:

Partner Name	Point of Contact (name, email, phone)	Specific Role in the Project
Penobscot Nation	Chuck Loring Jr. chuck.loring@penobscotnation.org 207.817.7330	Penobscot Nation representative on the BAC and will assist with site identification and selection on tribal lands.
Housing Authority of the City of Old Town	Laurie Miller, lmiller@oldtownhousing.net, 207.827.6151	Help Facilitate Bringing Commercial & Housing Developers to Old Town and the Target Area.
Eastern Maine Development Corporation	Lee Umphrey lumphrey@emdc.org 207-942-6389	EMDC has managed numerous Brownfield Grants and will assist with outreach and providing potential Cleanup funding through their Brownfields RLF program.
Caring Community Cupboard	Linda Bryant [REDACTED]	Our mission is to impact food insecurity in our communities and provide dedicated space to build community connections. We will provide Public Outreach & Education on Health & Environmental Impacts in the Target Area.

2.b.iii Incorporating Community Input

We will conduct up to four public education/information meetings to be held in our Target Areas during the assessment and reporting phases, and remedial and reuse planning (interpreters will be provided). Project stakeholders include site owners, neighbors, developers, community organizations, citizen groups, lenders, EPA, and MEDEP. We will conduct up to two public meetings for each priority site: after the Phase II Assessment and after the ABCA/RAP phase. These meetings will be community charrettes (in-depth design/planning process) to solicit public input and develop cleanup/reuse options that incorporate green space/recreation, architectural options for the reuse, as well as community needs for the proposed site redevelopment. Our BAC

will act as a steering committee and make decisions with respect to site selection/prioritization, cleanup/future use and respond to public input. We will compare findings to our Comp Plan for context. The QEP will provide drawings of cleanup/reuse options.

Project updates will be publicized in local and state-wide newspapers, on the City’s website, and social media. The City will create informational flyers, handouts, and project summary documents, and will distribute paper versions of these documents in key locations throughout Old Town to include our sensitive populations (elderly and low-income individuals) who may not have internet access. Hard copies of project documents and reports will be available at City Hall for review. Public meetings will be handicapped accessible. The City will also accommodate those who speak languages other than English and/or may have hearing/reading impairments (such as the elderly and the disabled), by providing translators, and providing access to videotelephone and online chat services through a cloud-based, software (e.g. Zoom) as a means for community engagement.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs (including 3.a. i., ii., iii., iv.)

Task/Activity 1: Cooperative Agreement Oversight
<p>i. Project Implementation:</p> <ul style="list-style-type: none"> • EPA-Funded Activities: The City of Old Town will perform program development, organization, and support; will conduct programmatic oversight, and will develop a BAC that will include City staff, the QEP, MEDEP, EPA, and citizen/project stakeholders. Based on a competitive bid process (per 40 CFR 30), the City will develop a Request for Proposals, hold interviews, and select a QEP. City staff will attend the National Brownfield conference. Quarterly reports and MBE/WBE reporting will be completed. ACRES will be maintained/updated. The City will establish a schedule and facilitate meetings with the BAC, MEDEP, and EPA. Project implementation will include the project team identifying priority sites in the Target Area. • Non-EPA grant resources needed to carry out task: None
<p>ii. Anticipated Project Schedule: This will be an ongoing and continuous effort throughout the 4-year grant cycle. We anticipate the BAC will be developed within 1 month of funding, and that meetings will be held at regular intervals throughout the project. Our BAC project kickoff meeting will be conducted prior to QEP selection, and a second meeting will be held after selection. We anticipate a QEP will be selected within 3 months of funding. MBE/WBE reports will be submitted and ACRES will be updated on a Quarterly basis.</p>
<p>iii. Task/Activity Lead: The City will oversee this task, with assistance from the BAC and selected QEP.</p>
<p>iv. Outputs: A BAC will be developed; a QEP will be selected; the City and the QEP will facilitate/attend up to three meetings with the BAC; our inventory will be expanded; 16 quarterly reports will be prepared; MBE/WBE reporting will be conducted as needed; ACRES will be updated on a Quarterly basis.</p>
Task/Activity 2: Community Engagement
<p>i. Project Implementation:</p> <ul style="list-style-type: none"> • EPA-funded activities: With help from the BAC and QEP, the City will hold up to four public meetings to solicit site data and educate local officials and citizens about the Brownfields process. We will also develop and distribute outreach materials (such as Site nomination forms, informational and outreach brochures, and general informational packets). Public participation will be enhanced by televising City and BAC meetings, website and social media announcements (Facebook), public notices in newspapers, press releases, and legal ads. Once sites are selected, and if the property owner is amenable, we will prepare EPA eligibility documentation to enter the site into the Program. • Non-EPA grant resources needed to carry out task/activity: Community partners will be used to help advertise public meetings and solicit input from the community.
<p>ii. Anticipated Project Schedule: Community outreach will occur over the duration of the grant; the first public meeting will occur at project kickoff (Brownfields 101) and as part of the Brownfields Inventory. Subsequent public meetings will be held after Sites are entered into the program and assessment activities have begun. Additional public meetings will be held during cleanup and reuse planning.</p>
<p>iii. Task/Activity Lead: The City will oversee this task with assistance from the BAC/QEP/community partners. We will prepare a Brownfields Inventory to prioritize and rank identified sites based on perceived environmental concerns, potential for economic development, proximity to existing infrastructure, and other criteria with the highest rated sites being selected for the program.</p>

iv. **Outputs:** Outreach and educational materials (Brownfield 101 tri-fold brochure and FAQ handout), public meeting advertisements, press releases and project update reports, educational materials to support public meetings (PowerPoint presentations and handouts), completed Site nomination forms. Four public meetings. One-on-one meetings with Site abutters, as needed.

Task/Activity: Phase I & Phase II Site Assessments (Task 3)

i. **Project Implementation**

- **EPA-funded activities:** The QEP will conduct Phase I ESAs for eligible sites in accordance with ASTM E1527-13/21 as well as “All Appropriate Inquiry” standards; these will include a site visit, review of regulatory agency files, interviews with site personnel, review of historical files, and a written report for each site. The ESAs will include a summary of “recognized environmental conditions” and recommendations for follow-up investigations and activities. Based on these recommendations, Phase II ESAs will be conducted to determine if contamination exists, and if so, to what extent. Prior to conducting a Phase II ESA, a SSQAPP and sampling plan will be prepared for USEPA and MEDEP review and approval. Site owners, City staff, and the general public will be kept informed of ongoing activities.
- **Non-EPA grant resources:** None

ii. **Anticipated Project Schedule:** ESAs will be completed throughout the four-year grant cycle. We anticipate we will complete our first Phase I ESA within 4 months of receiving grant funds. A Phase I ESA takes approximately 3-4 weeks to complete, SSQAPPs take approximately 2 weeks to prepare and have a 30-day MEDEP and EPA review period, and Phase II investigations and reporting often take 6-8 weeks or more depending on scope of work, although these schedules can be expedited if needed.

iii. **Task/Activity Lead(s):** The QEP will oversee this task, with assistance by the City.

iv. **Outputs:** 16 Phase I ESAs, 10 SSQAPPs, 10 Phase II ESAs, 5 HBMIIs.

Task/Activity: Cleanup Planning & Area-Wide Planning/Reuse Planning (Task 4)

i. **Project Implementation:**

- **EPA-Funded Activities:** The QEP will develop ABCA/RAPs for AOCs which require remediation based on Phase II ESA data. The ABCA/RAPs will include remedial actions for each identified contaminant that exceeds applicable MEDEP guidelines. Remedial actions will be compared based metrics such as cost, feasibility, and effectiveness in protecting human health and the environment. Based on the results, a remediation plan will be developed for the AOC, considering the specific or potential reuse scenario(s) for the Site). Concurrently, Old Town, the BAC, and the QEP will complete reuse planning activities on select Sites. A public meeting will be held during this reuse planning period to solicit input from the public and community partners; we envision this meeting as a design charettes to encourage public participation.
- **Non-EPA grant resources needed to carry out task/activity:** None

ii. **Anticipated Project Schedule:** ABCA/RAPs will be completed within 1-2 months of finalizing the Phase II ESA report. The public meeting/design charette will be held after the draft ABCA/RAPs are complete, but before they are finalized. We anticipate no impediment to completing this task within the grant period.

iii. **Task/Activity Lead:** The QEP will oversee the completion of ABCA/RAPs. The City will oversee the public meeting/design charettes with assistance from the QEP and BAC.

iv. **Outputs:** Outputs include up to eight (8) ABCA/RAPs.

b. Cost Estimates

Task 1 – Cooperative Agreement Oversight: This task includes the City’s time for program development, organization, and support (80 hours @ \$50/hour = \$4,000); up to three meetings with the BAC (30 hours @ \$50/hour = \$1,500); preparing bidding documents for QEP selection and interviewing/contracting with the QEP (15 hours @ \$50/hour = \$750); \$1,000 for supplies; and for travel to the National Brownfields Conference (two people @ \$2,250 air/bus fare, lodging, and registration. QEP time associated with this task is estimated at \$5,250, which includes attendance at three BAC meetings and programmatic support.

Task 2 – Community Engagement: Costs under this task include City staff (130 hours at \$50/hour = \$6,500); \$1,000 for supplies and QEP personnel time (estimated at \$6,500) to attend meetings, prepare presentations and materials, and respond to follow-up questions and comments solicited

from the community. Outputs include up to four public meetings and preparation of public outreach deliverables to communicate site status and outcomes.

Task 3 – Phase I & II Environmental Site Assessments: We anticipate our QEP completing sixteen Phase I ESAs (16 x \$4,000 each). If Phase I Assessment results indicate “recognized environmental conditions” are present, our QEP will complete additional investigations to confirm or dismiss the conditions and determine the nature and extent of contamination. The QEP will prepare a Site-Specific Quality Assurance Project Plan (SSQAPP) and submit it to the EPA and MEDEP as part of this task prior to undertaking Phase II activities. The Phase II Investigation may include monitoring wells, test borings, test pits, and groundwater, soil, and soil gas sampling, or evaluation/sampling for hazardous building materials. The QEP will use results from the Phase II investigations to develop ABCAs/RAPs. We anticipate that the QEP will complete ten Phase II Investigations as part of the Brownfields Assessment Grant (10 x \$33,000 each, inclusive of drilling/laboratory subcontractors). Cost includes the City’s time for report reviews and interfacing with MEDEP, EPA, BAC personnel and property owners (120 hours at \$50/hour = \$6,000).

Task 4 – Cleanup/Reuse Planning: We anticipate that our QEP will complete eight cleanup plans/feasibility studies, known as Analysis of Brownfields Cleanup Alternatives (ABCAs) with Remedial Action Plans (RAPs) (8 x \$8,000 each). Costs include the City’s time for review of ABCA/RAPs, interfacing with MEDEP, EPA and BAC personnel, and attending/participating in a public meeting/design charette (100 hours at \$50/hour = \$5,000).

Budget Categories		Project Tasks (\$)				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Phase I & II Assessments	Task 4 Cleanup/ Reuse Planning	
Direct Costs	Personnel	\$6,250	\$6,500	\$6,000	\$5,000	\$23,750
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$4,500	\$0	\$0	\$0	\$4,500
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies*	\$1,000	\$1,000	\$0	\$0	\$2,000
	Contractual	\$5,250	\$6,500	\$394,000	\$64,000	\$469,750
	Other (specify)	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$17,000	\$14,000	\$400,000	\$69,000	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Budget		\$17,000	\$14,000	\$400,000	\$69,000	\$500,000

*Supplies include presentation and printed materials for community meetings, microphone/video rentals, chairs/tables.

c. Plan to Measure and Evaluate Environmental Progress and Results

Old Town and it’s QEP will track progress to ensure project funds are expended timely and efficiently. We will hold monthly status meetings to review our milestone chart, priority sites, schedule, and budget. ACRES will be utilized for preparing electronic quarterly reports. Our overall expected outcomes are to return the selected Brownfields and nearby areas impacted by the stigma of perceived proximity to contamination and tangible blight back to economic vitality.

Completion of prepared environmental reports (i.e., Phase I and II Reports, QAPPs, ABCA/RAPs, and reuse/redevelopment planning activities) will document the assessment progress at each site and will also be outputs of the program. Sites selected to participate in the Brownfield assessment program either are or will be entered into the MEDEP’s Voluntary Response Action Program. The number of sites assessed and the particulars of the assessed sites (i.e., acres of site, contaminants found, assessment money spent, leveraged money, etc.) will be tracked via EPA quarterly reports, as well as EPA’s ACRES online database. These documents and work products will provide the liability protections required to stimulate redevelopment. Phase I ESAs provide landowner defense under CERCLA, completion of ABCAs will determine cleanup costs,

reuse/redevelopment planning activities will assist developers with their business plans for development of the Brownfield sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

4.a.i Organizational Capacity, 4.a.ii Structure, & 4.a.iii Description of Key Staff

This project will be managed by the City Manager, Bill Mayo, who has worked for the City since 1999. Bill currently manages all grants for the City including the **prior \$600,000 EPA Brownfields Cleanup of the Former Old Town Canoe Factory Site, a \$400,000 EPA Brownfields Assessment Grant, and the recent \$300,000 Assessment Grant** (quarterly reporting, ACRES updates, drawdowns). Bill brings considerable municipal experience having worked for several communities in the State of Maine since 1985. Additional support will be provided by the City's Finance Director, Danielle Berube. The Old Town Development Board of Managers will be brought in to maintain project leadership and to recruit qualified staff should employee turnover occur during the project period. This board is made up of key business people in the City and administration from the University of Maine. The City, through Bill and Danielle has shown the ability to successfully spend funds in a timely fashion while meeting Brownfield grant requirements.

4.a.iv Acquiring Additional Resources

The City will manage a competitive procurement process in accordance with 40 CFR 30 through a Request for Proposals to solicit responses from qualified firms to select our QEP and to assist with community outreach and regulatory compliance. Old Town and its selected QEP will liaison with the MEDEP to design, coordinate, and oversee the successful completion of the proposed assessment program. We will also seek the advice and support of EPA and MEDEP Brownfields Coordinators for direction on programmatic requirements. *The City routinely creates requests for proposals/qualifications and conducts competitive procurements for projects.*

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

As part of the FY2012 \$600,000 EPA Brownfields Cleanup of the former Old Town Canoe Factory Site, **the City implemented green remediation plans which included recycling and reusing building materials.** Old Town's successful Cleanup of the former Old Town Canoe site has left the site ready for development and a neighborhood praising the accomplishments of the City. The removal of this large industrial complex in our downtown has opened the area up to redevelopment. The City completed a feasibility study to consider the potential for a hotel and commercial space on this site. This Cleanup was submitted to the MEDEP Voluntary Response Action Program (VRAP) and reached closure through VRAP and all required information was submitted to EPA to reach Brownfields closure. All quarterly reports were submitted on time and the site entered into ACRES.

The City is currently closing out a successful FY2019 Brownfields Assessment Grant. Our first FY2016 \$400,000 Brownfield Assessment Program has been closed out. Sites assessed under this program include work at the former Jefferson school (currently being renovated into residential apartments and office space) and the former EXPERA mill site. Quarterly reports have been submitted to EPA in a timely fashion and sites have been entered into ACRES.

The City has managed grant projects and federal funds for similar projects for decades, including hiring the necessary professional services to complete successful projects. Old Town has met and complied with all EPA and MEDEP Brownfields reporting requirements, submitted technical reports, and successfully accomplished the goals of these agreements.

(2) Compliance with Grant Requirements

Under the exact Project Management described above, the City recently managed a FY2019 EPA Brownfields Assessment and a FY2016 \$400,000 EPA Brownfields Assessment. This agreement is on schedule and budget to be completed in 2023. This same project team managed the FY2012 \$600,000 EPA Brownfields Cleanup of the Former Old Town Canoe Factory Site. This project was completed ahead of schedule and budget and the grant was extended for another year to utilize the remaining funds for site reuse planning which has since been closed out (2016). All required quarterly reports, ACRES updates, and financial status reports have been completed in a timely manner. The City has never received any adverse audit findings.

ATTACHMENT A

Threshold Criteria for Assessment Grants

**City of Old Town, Maine
EPA FY2024 Brownfields Assessment Grant Proposal**

THRESHOLD CRITERIA

1. Applicant Eligibility

The City of Old Town is a Maine municipality eligible to apply for Brownfields Assessment funding from the EPA Brownfields Grant Program.

2. Community Involvement

Old Town will hold up to four open meetings/workshops for periodic assessment progress reports and community education regarding potential environmental risks from the Brownfields sites. We will advertise these meetings publically via e-mail, a legal announcement in the local newspaper(s), and on the City's website, door-to-door fliers, and will make meeting minutes publically available. We will communicate the progress of our Brownfield assessment program to citizens through regular status updates available on Old Town's website; reports available for review at City Hall; updates broadcast on the Community TV channel, press releases, legal ads, and other public notices as needed; and, through local news coverage of public meetings including the Initial Brownfields Inventory meeting and subsequent meetings for each assessment site.

We will submit press releases on the Old Town Brownfields program to local newspapers including the *Bangor Daily Journal* and/or *The Penobscot Times*. Old Town has an outreach program to notify the public about economic development projects, maintains an informative public website, and uses social media (Facebook) to promote public awareness. Old Town is exploring new techniques and technology to solicit greater input from a broader segment of the community, and we have identified the Stillwater Avenue and the downtown/Main Street as **focus areas for outreach sessions** to develop immediate action strategies.

3. Expenditure of Assessment Grant Funds

The City of Old Town closed out an FY2019 EPA Brownfields Assessment grant (received a 1-year extension due to COVID project delays) funds were drawn down prior to September 30, 2023.

4. Contractors and Named Subrecipients

Not Applicable.