

**Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application
Our Katahdin Engineering Building
Former Great Northern Paper Company, Millinocket, Maine**

1. Applicant Identification: Our Katahdin
245 Aroostook Avenue
Millinocket, Maine 04462
2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested
 - i. Amount Requested: \$650,000
 - ii. Cost Share Waiver: Yes – Hardship Waiver Request Attached
3. Location
 - a. City: Millinocket
 - b. County: Penobscot County
 - c. State: Maine
4. Property Information: Engineering Building - Former Great Northern Paper Company,
1 Katahdin Avenue, Millinocket, Maine 04462
5. Contacts:
 - a. Project Director: Steve Sanders, Director of Mill Site Redevelopment, Our Katahdin, 245 Aroostook Avenue, Millinocket, Maine 04462; steve@ourkatahdin.com; (207) 447-1788
 - b. Chief Executive/Highest Ranking Official: Sean DeWitt, President, Our Katahdin, 245 Aroostook Avenue, Millinocket, Maine 04462; sean@ourkatahdin.com; (917) 705-4669
6. Population: The cleanup project is located in the Town of Millinocket, which has a population of 4,114 (2020 American Community Survey, Census.gov).

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The proposed brownfield site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached document.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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 proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2
The reuse of the proposed cleanup site(s) will incorporate energy efficient measures.	2
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	NA

8. Letter from State Environmental Authority: Attached



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

November 17, 2021

Ms. Dorrie Paar
EPA Region 1
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 Our Katahdin, as a qualifying non-profit, plans to conduct cleanups and is applying for federal Brownfields grant funds.

Sean DeWitt of Our Katahdin has developed an application requesting site-specific federal Brownfields Cleanup funding for the Engineering Building located at former Great Northern Paper Site in Millinocket, Maine.

If Our Katahdin 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: Sean DeWitt, Our Katahdin

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
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

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

1.a Target Area and Brownfields

1.a.i Background and Description of Target Area

Our Katahdin (OK) is a non-profit organization that serves the Town of Millinocket, a small town with a population of 4,114¹ which is located in the shadow of Mount Katahdin at the terminus of the Appalachian Trail in northern Maine. *The Town of Millinocket contains the 1,400-acre former Great Northern Paper Company (GNP) mill site, which was once the heart and lifeblood of the community. **The GNP Site, the adjacent residential areas, and the Engineering Building is the Target Area of this Cleanup Grant Application.*** Visitors to the once-vibrant Target Area are now confronted with distress, blight, and neglect at the GNP Site and in empty store fronts of the hollowed-out downtown. Many of Millinocket's inhabitants, including members of its elderly, low-income, unemployed and disabled sensitive populations, live near the Engineering Building (the Subject Site of this cleanup grant application), located in the northern portion of the GNP site.

The GNP mill was constructed in 1901 and quickly became the world's largest paper mill. In the 1960's and 1970's, at its peak, this mill employed more than 2,000 people. Global competition and lack of investment led to mill down-sizing and layoffs starting in the 1990's, which was followed by the devastating closure of the GNP Mill in 2008. The GNP closure, and the loss of over 2,000 jobs in one small, isolated region devastated the local economy. Unemployment spiked in the wake of the closure, causing massive workforce flight and abandonment of industrial, commercial and residential properties. Since 1970, Millinocket lost more than 45% of its population, partially due to the mill closure². The majority of people who left were technical and skilled laborers, families with young children, or people of child-bearing age. In 2019, 61% of Millinocket's residents were age 45 or older¹. A lack of jobs and opportunities has prevented displaced people from returning to the area, and an outmigration of our young population left behind an aging generation struggling to adapt and reinvent themselves in a dwindling economy. Unemployment in the area remains high at 6.5%² and the median household income in Millinocket (\$32,730) is approximately 60% of the median household income in Maine (\$53,024)². These disheartening trends for Millinocket are predicted to become worse in the foreseeable future due to the Covid-19 pandemic.

Since its closure, the GNP site has been scrapped and partially demolished, and is a neglected, distressed, 1,400-acre blight in dire need of cleanup. ***The 3-story 13,000 square foot (footprint) Engineering Building, one of the most visible buildings on the GNP site, is the focus of this cleanup grant.*** Like other buildings on the GNP site, the Engineering Building is in need of cleanup, reuse, and redevelopment before it falls into further disrepair.

1.a.ii Description of the Brownfield Site(s)

The Engineering Building (Subject Site for this Hazardous Cleanup grant) is bordered by Millinocket Stream and is one of many vacant and neglected buildings on the GNP site. At the time of the building's construction in the 1960's, it was a modern, technologically-advanced building utilized as the engineering center for the GNP operations. A Hazardous Building Materials Inventory (HBMI) completed at the Site through a U.S. EPA Targeted Brownfields Assessment identified: asbestos-containing materials (ACM) which represent an exposure risk during building redevelopment or demolition; PCBs in building materials and fixtures; lead-based paint (LBP); and universal and hazardous wastes including fluorescent bulbs and ballasts, mercury-containing thermostats, and other items. The HBMI also identified the presence of hazardous levels of mold in the building.

The Engineering Building has been vacant and abandoned since the mill closed in 2008, and has deteriorated under long winters, leading to increased human exposure to hazardous building materials. If not abated soon, the building will deteriorate to the point where asbestos, PCBs, mold and lead paint will impact the health of trespassers, maintenance workers, site tenants and the surrounding community.

¹ 2020 American Community Survey. Census.gov

² "Census of Population and Housing". Census.gov

1.b Revitalization of the Target Area

1.b.i Reuse Strategy and Alignment with Revitalization Plans

OK was formed to help the Target Area with reuse and revitalization planning, with the mission of bringing jobs back to the area through investment in Millinocket’s core infrastructure, including sustainable reuse of the Engineering Building and the GNP site. OK has acquired and is redeveloping the GNP site into the One Katahdin Fiber Park. OK has developed a “Business and Development Plan” which outlines strategies comparable to Defense Base Closure and Realignment Act (BRAC) Sites, which go through closure and are often turned into industrial parks. OK’s goal for this “Fiber Park” is to provide utility resources to the next generation of wood product, information technology, and manufacturing at industrial scale and competitive rates; the end result will be a self-sustaining industrial campus with 10-15 new businesses and 300-500 new job opportunities. Cleanup of the Engineering Building is a vital step in the overall reuse and revitalization plan for the GNP site; this building will serve as the centerpiece for the development of our new forest products technologies, capitalizing on the Site’s proximity to wood, water, rail, affordable hydropower and other industrial infrastructure.

The Engineering Building is not located in a federally protected floodplain; however, OK’s Business and Development Plan incorporates reuse goals which are suitable and appropriate for areas of the Site which are protected (wetlands). OK also partnered with Innovative Natural Resources (INRS) and participated in their Mill Development Modeling research to identify how the GNP site could be redeveloped into a multitenant industrial park, utilizing the sites’ assets in an economically sustainable manner.

In 2018, Millinocket, East Millinocket, and Medway began working on combining their Comprehensive Plans. This new plan highlights the former GNP Site as a priority area to focus economic development opportunities, and has developed tax incentives, TIFs, and payment in lieu of taxes (PILT) to incentivize redevelopment at the GNP Site. OK and the Town of Millinocket have formed a private-public partnership and created an Economic Redevelopment Committee to provide guidance to the GNP redevelopment and to develop long-term reuse and revitalization goals. *Under the Tax Cuts and Jobs Act of 2017, Millinocket was designated as an “Opportunity Zone.”* The Town is also identified as being part of the Pine Tree Development Zone Program, which offers a reduction in taxes if jobs are created. Millinocket has been working hand and hand with OK to redevelop the Site; they have assisted OK in resource development and tenant support. **The OK redevelopment plan for the Engineering Building is directly in-line with the goals of the Town’s (and Katahdin Region’s) overall comprehensive plans.**

1.b.ii Outcomes and Benefits of Reuse Strategy

Performing environmental cleanup of the Engineering Building will be an important step in a multi-phased process to redevelop the overall GNP Site. This building will be the centerpiece for the next generation of development and innovation at the GNP Site. This cleanup will build on prior EPA Cleanup grants and redevelopment planning at the Site, and will demonstrate to the public, and to project stakeholders, the benefits and successful outputs that can be achieved by teaming with the U.S. EPA. Remediating this building and taking steps towards overall mill site redevelopment will have immediate direct and positive impacts to public welfare, health, and the environment; and will stimulate the economy, create much needed jobs, expand the tax base, increase property values, reduce blight, improve community morale and neighborhood investment. Revitalizing this building will allow for the reuse of existing sewer, water, and electric infrastructure as well as reusing a building that is predominately intact and can be remediated and readapted in a cost-effective manner.

The Millinocket community meets the criteria of the Justice40 Initiative as a disadvantaged community and was designated as a “Opportunity Zone”. It is a population of low income, elderly residents who have been disproportionately impacted by high unemployment, environmental impacts from the mill, and substandard housing. ***This cleanup project will utilize green hydroelectric power generated in the Target Area at the GNP site.*** Wetlands and flood zones do not exist in the vicinity of the Engineering Building, but future development of the GNP site will preserve wetlands located across the site. The reuse of the Engineering Building will be a

U.S. EPA Brownfield Cleanup Grant Application – Narrative

Our Katahdin Engineering Building – Former Great Northern Paper Company, Millinocket, Maine bellwether that promotes prosperity and further commercial, residential, and industrial revitalization in the Target Area.

1.c Strategy for Leveraging Resources

1.c.i Resources Needed for Site Reuse

OK is engaged with a development team focused on reusing the Engineering Building, as well as other portions of the GNP site. OK has been applying and will continue to apply for grants and foundation funding to assist development efforts at the GNP Site; these funds will be used to renovate and rehabilitate the Engineering Building AFTER environmental cleanup is complete.

In October 2020, OK received a \$350,000 Site Specific Assessment Grant for the GNP site, a \$500,000 Cleanup Grant for the former Administration Building, and in 2021 a \$500,000 Cleanup Grant for the Research Building. In September 2018, OK received a \$5.3M federal grant from the U.S. Economic Development Agency (EDA) to remediate/build infrastructure at the GNP Site. Additionally, OK has *already received* a \$450,000 loan from Millinocket, a \$259,446 grant from the Maine Rural Development Authority, and a \$200,000 grant from the Northern Border Regional Commission. OK also has firm leveraging commitments from the following: \$10,000 grant funding from the Maine Community Foundation to support the engineering and planning of the Millinocket industrial site; \$114,774 from the Elmina B. Sewall Foundation via sub-grant from the Nature Conservancy for community outreach and engagement; and \$150,000 in federal grant funding from the Northern Borders Regional Commission for fiber optic broadband infrastructure. Documentation for these funding sources is included in **Attachment A**. This money has been earmarked for infrastructure, utility, and telecommunication improvements which are necessary to attract and secure tenants.

The leveraged funds described above will support the renovation/redevelopment of the Engineering Building; however, none of these improvements can be conducted if the building for which they serve is delapidated, full of hazardous materials, and unsafe for human occupancy. Until the hazardous building materials are abated, no redevelopment or renovation of the building can be conducted, and these utility improvements would be for nothing.

Once cleanup activities have occurred and tenants return to the Site, OK will derive revenue to support site redevelopment through tenant lease payments and fees on site resources such as process water, wastewater treatment, and power. OK also intends to use land leases, equipment and inventory salvage, and select timber harvesting valued around \$600,000. In the event additional funding for remediation activities are needed, as a nonprofit, OK will be eligible for funding through the Maine Department of Environmental Protection and the Maine Department of Economic and Community Development’s Brownfields Grant Programs.

1.c.ii Use of Existing Infrastructure

The Engineering Building and Target Area maintain significant infrastructure which can be reused and revitalized as a cost savings to the overall redevelopment project. Electricity: Hydroelectric power is generated in the Target Area that has 3 substations, 2 transmission right of ways, and transformers. Water: The site has two large intakes for process water which will allow OK to provide competitively priced water to the Engineering Building. Wastewater: The Target Area currently has a wastewater treatment plant which will allow OK to provide competitively priced wastewater treatment to the Engineering Building. Rail Access: The Target Area has access to a rail spur on the Central Maine & Quebec rail line that is capable of transporting goods to deep water ports of Searsport and through an interconnect to the metropolitan centers of the Northeast. Golden Road Fiber Supply: The Target Area and Engineering Building are located at the end of the storied Golden Road, a main artery in Maine’s private forest road network which provides off-highway access to millions of acres of private timberland. This road operates without weight restrictions, allowing efficient and low-cost transportation of fiber from the woods to the mill. Data: The GNP site has direct access to high-speed broadband. Regional Workforce Efforts: The Engineering Building benefits from its proximity to the University of Maine in Orono, Eastern Maine Community College in Bangor, and the University of Augusta in East Millinocket. These workforce pools can provide companies with both operational and engineering/managerial labor. *No other key infrastructure needs are anticipated for the cleanup of the Engineering Building.*

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i The Community’s Need for Funding

Due to the small population of the Target Area (4,114¹) and existence of economically-impooverished sensitive populations, OK cannot provide direct funding to this project. When GNP began down-sizing and eventually closed its doors, over 2,000 people lost their jobs and unemployment rates spiked. Technical, good-paying jobs have not returned to the region, and unemployment in the Katahdin Region remains high at 6.5%. This caused outmigration due to lack of jobs and opportunities; and the former Town Manager estimates the current population will shrink to 2,500 by the year 2030. “That means a new vacant home every two weeks for the next 15 years.” Tax foreclosed and run-down buildings and houses are commonplace. The exodus of the younger population means the loss of \$11 million a year in locally-driven retail spending (Eastern Maine Development Corp). The Millinocket school budget has been cut by \$1.7 million in the last 4 years as the enrollment has declined from 655 in 2007 to 500 and continues to drop.^{3,4} *According to the 2017 American Community Survey, no new homes have been constructed in Millinocket since 2010.*

The median household income in Millinocket is \$32,730, approximately 60% of the current state of Maine median household income (\$53,024)³. The closure of the paper mill resulted in a further loss of more than \$2 million in municipal taxes. The economic hardships resulting from the mill closure continue, and Millinocket’s 2016 valuation, \$176 million, represents a decrease of about \$35 million from the previous year. This devaluation was caused in part by the demolition of buildings at the GNP site. The town also lost \$32.5 million in personal property valuation with the removal of equipment from the GNP mill site⁵. These economic hardships have made it impossible for the Town to fund environmental and cleanup projects, or to address the blight and vacant downtown buildings using municipal funds.

Because the Town is unable to fund environmental cleanup/assessment activities, responsibility falls on individuals, business owners, and non-profit groups. OK has taken the monumental task of redeveloping the 1,400 acre GNP Site; which will only be possible through assistance from governmental and non-governmental agencies. This Brownfield grant is crucial to the reuse of the Engineering Building, as the environmental cleanup is the impetus for area reinvestment and development, job creation, and an increase in the Town’s tax base.

2.a.ii Threats to Sensitive Populations

(1) Health or Welfare

High unemployment rates have caused migration of young adults, professionals, and talented laborers who are forced to move elsewhere to find jobs. Since 1970, Millinocket has lost more than 45% of its population (the majority of which are younger individuals), leaving 61% of its current residents as being age 45 or older. In Millinocket, the median age is 54.2 with people over 65 making up almost 30% of the population and placing it in the 93rd percentile nationally⁶. The older population requires increasingly high service costs and provides the Town with a diminishing tax base. *This is compounded by the fact that 25.6% of the population is affected by a disability (compared to 15.9% in Maine); and 41.3% of the elderly population over 65 is affected by a disability (2017 American Community Survey).* Our low income, unemployed, disabled adult population with less than a high school education is also disproportionately high (~75th percentile in the region and <60th percentile nationally⁶) and the elderly are our sensitive populations which are disproportionately impacted by hazardous building materials (asbestos, lead paint, PCB, and mold) which are present in homes and buildings in the Target Area. These environmental issues, combined with the overall disinvestment and blight that plagues the Target Area, have impacted the health of low-income families and the disabled, elderly individuals that live in the Target Area, and that are limited in their choices for housing options, lacking the funds to move or conduct necessary renovations to keep them safe. Low-income residents in particular, pay a disproportionate share of their income toward healthcare. Adding environmental

³ <https://www.pressherald.com/2014/08/17/how-much-further-can-millinocket-fall/>

⁴ <https://www.publicschoolreview.com/maine/millinocket-public-schools/2308280-school-district>

⁵ <https://bangordailynews.com/2015/09/03/news/penobscot/millinocket-property-tax-rate-rises-as-valuation-plummets/>

⁶ EJSCREEN

Our Katahdin Engineering Building – Former Great Northern Paper Company, Millinocket, Maine contaminants to their healthcare concerns is overly burdensome to one of the Town’s most sensitive populations.

This cleanup project is an important step in the reuse and redevelopment of the Engineering Building and GNP site, and the revitalization of the Target Area. This sort of project will create community pride, investment, and good-paying jobs (both at the Site, and through echo development of support businesses). Reinvestment in the community will lead to improvements to infrastructure, the housing stock, and downtown area, ultimately improving the health and welfare of those sensitive populations who live and work in the Target Area.

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

Asbestos is prevalent inside the Engineering Building, and many abandoned and dilapidated buildings in the Target Area. Asbestos contributes to respiratory ailments such as *asthma, lung cancer and asbestosis*. Maine is situated in the nation’s “tail-pipe,” where the Jet Stream deposits smog, smoke, and ozone; this, combined with asbestos in our Target Area, is in part why Maine has the highest asthma rate in New England. According to the Maine CDC, 12.8% of adults in this region suffer from asthma compared to 8.9% nationwide. Asthma Emergency Department Visits for Millinocket had 111 per 10,000, ranking 20th out of 721 towns and cities in the state (Maine Tracking Network). Poor air quality in the Target Area is compounded by large quantities of particulates, nitrogen dioxide, sulfur dioxide, and carbon dioxide which were historically emitted from the GNP smoke stacks during paper manufacturing⁷. Maine also continues to have the highest age-adjusted cancer incidence and mortality rates in the U.S. The Maine CDC estimates the rate of cancer incidences in Penobscot County is 537 incidences per 100,000 people, which is 115% higher than the cancer rate nationwide (469 incidences per 100,000 people).

Our 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 the United States. In the USA, 41% of occupied housing was constructed before 1970 (when lead paint was still widely used); however, in Millinocket, that number skyrockets (lead paint indicator 74 percentile nationally⁶). *This means 3 of 4 individuals in Millinocket, many of whom are elderly, disabled, and low-income, are living in homes which may be contaminated with lead and asbestos particulates and poor indoor air quality*, which may be contributing to asthma and cancer rates. The proposed cleanup of the Engineering Building will reduce these health treats to our community.

(3) Promoting Environmental Justice

Brownfields have created environmental justice challenges which have resulted from past industrial and governmental operating policies which caused a cycle of disinvestment and poverty. In addition to environmental hazards, the EJ Index for Hazardous Waste and RMP proximity is at the 89 percentile compared to state and over the 50th percent nationwide and several EJ indicators related to air emissions exceed the 60-th percentile in the region⁶. The median household income in Millinocket is \$32,730, approximately 60% of that in the State of Maine (\$53,024), and 10.1% of the population lives in poverty⁸. The historic mills that once provided jobs, security, and financial contributions, are now contaminated relics which are a drain on the Town’s economy, environment, and demographics as reflected in the EJ indices. Historically, GNP prevented other industries from locating in Millinocket because they didn’t want to compete for the labor pool⁹. The resulting lack of economic diversity, coupled with the town’s geographic isolation, crippled the area when the mill closed. Options for former mill workers are sparse, and because the average age of workers is nearly 60, for many, going back to school or retraining is not realistic. The Target Area is left with relatively no job opportunity, poor access to health care, no public transportation, and a diminished population. These impacts have disproportionately impacted low-income families and aging populations and created a significant environmental justice issue.

⁷ U.S. EPA National Emissions Inventory. EPA.gov

⁸ 2019 American Community Survey. Census.gov

⁹ <https://www.pressherald.com/2014/08/17/how-much-further-can-millinocket-fall/>

U.S. EPA Brownfield Cleanup Grant Application – Narrative

Our Katahdin Engineering Building – Former Great Northern Paper Company, Millinocket, Maine

According to EPA’s EJSCREENTool and EnviroAtlas, our Target Area has an aging population over age 64 in the 95-100 percentile, 95-100 percentile have less than a high school education, and the lead paint indicators are in the 90-95 percentile when compared to the State and the US. The Target Area’s revitalization, spurred by Brownfield assessment and redevelopment, will bring jobs and people back to the Katahdin region, 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 historic mill closure.

2.b Community Engagement

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

OK and Millinocket have formed a private-public partnership and created an Economic Redevelopment Committee to support the Engineering Building cleanup and redevelopment of the GNP site. The Town has also provided support through participation in community outreach (and use of Town Office for public meetings) and use of Town resources (public works, police department, facilities). The following community partners/stakeholders will provide meaningful support and guidance:

Partner Name	Point of Contact	Specific Role in the Project
Katahdin Area Chamber of Commerce	Peter Jamieson peter@katahdinmaine.com 207-723-4443	This business entity has more than 100 members and will provide support with future grant applications, attending meetings, visioning, marketing, and be part of the BCAC.
The Nature Conservancy	Bill Patterson, wpatterson@tnc.org , 207-607-4819	TNC will provide grants, will help convene community-based organizations, and will deliver in-kind/cash support.
Eastern Maine Development Corporation	Michael Ludwig MLudwig@emdc.org 207-942-6389	EMDC has managed numerous Brownfield Grants and will assist with outreach and providing potential funding through their Brownfields programs.
FOR/Maine	Adam Burk aburk@mdf.org 207-233-1920	FOR/Maine is a statewide initiative supported by the Maine Development Foundation focusing on growing the forest economy of Maine by 40% by 2025. They will provide contacts, connections to resources, and market-based strategies for the Engineering Building redevelopment.

2.b.iii Incorporating Community Input

OK is built on community engagement; having hosted extensive community outreach efforts to date, with resolute focus to continue these efforts as part of subsequent phases of work at the Site. OK will implement an aggressive, multipronged plan for involving the target community and stakeholders in the planning and implementation of this project, as well as soliciting input, and responding to questions/concerns in a meaningful way. The local community, project partners, and residents will be encouraged to provide feedback through social media outlets, via OK and Town websites, and in person at public meetings and the OK office (located in downtown Millinocket). This community engagement platform will be utilized to mobilize volunteers to support this project, solicit feedback, and support the cleanup/reuse of the Engineering Building.

Project updates will be publicized in local and state-wide newspapers, on the Town’s website, and on OK’s website and social media outlets. OK will create informational flyers, handouts, and project summary documentation, and will distribute paper versions of these documents in key locations throughout 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 the Town office and OK office for review. Public meetings will be handicapped accessible. OK 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 translating documents, providing translators, and providing access to videotelephony and online chat services through a cloud-based, software platform (e.g. Zoom Video Communications, Inc.)

U.S. EPA Brownfield Cleanup Grant Application – Narrative
 Our Katahdin Engineering Building – Former Great Northern Paper Company, Millinocket, Maine
 as a means for community engagement and teleconferencing in response to Covid-19 social-
 distancing protocols.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a Proposed Cleanup Plan

Based on previous EPA-funded assessments, a cleanup plan has been developed which includes removal and abatement of asbestos containing materials (except exterior windows proposed for reuse), PCB-containing caulks and paints, universal waste, and mold-impacted building materials. Lead-based paint would be abated/stabilized to facilitate interior demolition.

Hazardous building materials left in place would be managed under an Operation & Maintenance program, which would require periodic surveillance of encapsulated materials and outline best work practices during future renovation/disturbance. Abatement will be conducted utilizing standard techniques and will be implemented in a short time frame so that this property can return to economic vitality. OK will utilize a MEDEP-licensed Asbestos Abatement Contractor to remove and dispose of identified ACM pursuant to MEDEP Chapter 425 regulations. Caulks and paints which tested near/above the EPA threshold value for PCBs will be properly removed and disposed as PCB bulk product waste. Identified universal waste items will be properly removed and recycled or disposed. Mold impacts will be addressed by removing localized areas of apparent water damage/microbial growth during cleanout of interior demolition debris. Surfaces coated with LBP and/or PCB-containing paints below 50 mg/kg (Excluded PCB Products) will be stabilized via scraping of loose, flaking, and chipping paint, and encapsulated beneath subsequent paint layers.

Contractors utilized for cleanup will comply with Davis Bacon wage compliance and be required to document wages with interviews and backup. Removal of hazardous building materials will prevent human exposure, eliminate continuing sources of contamination to the environment, and allow rehabilitation and reuse of the building. During cleanup activities, measures to protect the public and our sensitive populations will be employed to ensure safe conditions. Currently, access to the site is restricted by locked gates and doors. Air monitoring and dust suppression methods will be utilized to ensure levels are within acceptable standards. A Community Relations Plan (CRP) will be prepared and a public meeting and 30-day public comment period will be conducted prior to initiating cleanup activities. Cleanup documentation will be submitted to MEDEP with a Voluntary Response Action Plan (VRAP) Completion Report. Upon completion of the Site cleanup activities, OK anticipates renovation and redevelopment of the Engineering Building will happen immediately.

3.b Description of Tasks/Activities and Outputs

3.b.i Project Implementation, 3.b.ii Anticipated Project Schedule, 3.b.iii Task/Activity Lead, & 3.b.iv Outputs

Task/Activity: Cooperative Agreement Oversight (Task 1)	
i.	<p>Project Implementation</p> <ul style="list-style-type: none"> • Discussion of EPA-funded activities: OK will perform program development, organization, and support, and will continue to work with our Brownfields Cleanup Advisory Committee (BCAC) that was created during OK’s prior Brownfield Cleanup Programs. The BCAC includes members of OK, the QEP, MEDEP, EPA, and citizen/project stakeholders. Based on a competitive bid process (per 40 CFR 30), OK will develop a Request for Proposals, hold interviews, and select a QEP. OK will attend the National Brownfield Conference. Quarterly reports and MBE/WBE reporting will be completed. ACRES will be maintained and updated. • Non-EPA grant resources needed to carry out task/activity: None
ii.	<p>Anticipated Project Schedule: We anticipate the BCAC meetings will be held at regular intervals throughout the project. We anticipate a QEP will be selected within 1-2 months of funding. Quarterly and MBE/WBE reports will be submitted and ACRES will be updated throughout the grant period.</p>
iii.	<p>Task/Activity Lead(s): OK will oversee this task, with assistance from BCAC and our QEP.</p>

<p>iv. Outputs: A QEP will be selected; OK and the QEP will facilitate/attend up to three meetings with the BCAC; 12 quarterly reports will be prepared; MBE/WBE reporting will be conducted as needed; ACRES will be updated as needed.</p>
<p>Task/Activity: Community Outreach & Engagement (Task 2)</p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • Discussion of EPA-funded activities: The QEP will prepare a Community Relations Plan for approval by the MEDEP and EPA. OK and the QEP will develop marketing materials; notify community members, adjacent landowners, and community organizations of cleanup schedules; advertise for public meeting through online and in-person methods; hold two public meetings to solicit input, educate, and update the community; and prepare public outreach materials. OK will provide outreach and communication to the public prior to undertaking the cleanup/abatement efforts, during remediation, and following remediation. • Non-EPA grant resources needed to carry out task/activity: Community partners will help advertise public meetings and solicit public input. Meetings may be held at the Millinocket Town Office or video conferencing (COVID-19).
<p>ii. Anticipated Project Schedule: Community outreach will be performed for the duration of the grant period; the 1st public meeting will occur after the QEP has completed draft versions of the cleanup plans/specifications and the 2nd will be held as cleanup nears completion.</p>
<p>iii. Task/Activity Lead(s): OK will oversee this task, with assistance from BCAC/QEP/partners.</p>
<p>iv. Outputs: A Community Relations Plan, outreach and educational materials (Brownfield 101 tri-fold brochure & FAQ handout), public meeting advertisements, press releases and project update reports, educational materials to support a public meeting (presentations & handouts). At least two public meetings. One-on-one meetings with Site abutters, as needed.</p>
<p>Task/Activity: Site-Specific Activities (Task 3)</p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • Discussion of EPA-funded activities: Prior to start of construction, the QEP (with OK oversight) will: prepare final cleanup/ abatement plans and specifications for review and approval by the EPA, MEDEP and OK; conduct a pre-bid site visit with proposed contractors; and prepare a SSQAPP for confirmatory sampling. OK/QEP will review contractor bids and select a cleanup contractor. OK will be in communication with MEDEP and EPA team members throughout this phase of work. The selected cleanup contractor will perform abatement of hazardous materials onsite, including proper off-site disposal in accordance with state and federal regulations. • Non-EPA grant resources needed to carry out task/activity: None
<p>ii. Anticipated Project Schedule: The QEP will prepare project documents and cleanup design within 3-6 months of selection (winter 2022/spring 2022). We plan to start abatement /cleanup work in the summer/fall of 2022 and will complete all work within the grant period.</p>
<p>iii. Task/Activity Lead(s): The QEP will oversee this task, with assistance from OK.</p>
<p>iv. Outputs: Cleanup/Abatement Plans and Specifications, bidding documentation, SSQAPP. Abatement and cleanup of Engineering Building in accordance with ABCA.</p>
<p>Task/Activity: Oversee Site Cleanup (Task 4)</p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • Discussion of EPA-funded activities: During cleanup/abatement activities, the QEP will perform the following tasks: monitoring and oversight of construction; project reporting to ensure compliance with the plans, specifications, and requirements for regulatory closure; reviewing and approving pay requisitions and DBE/MBE documentation; final site walk-through to issue project completion; and collection of confirmatory samples as necessary. The QEP will also prepare a MEDEP VRAP closure report for approval by the EPA and MEDEP, will prepare necessary regulatory paperwork to obtain a VRAP Certificate of Closure, and grant closeout documentation. OK will assist with project oversight and will be in communication with MEDEP and EPA team members throughout this phase of work.

- Non-EPA grant resources needed to carry out task/activity: None
- ii. Anticipated Project Schedule: We plan to start abatement and cleanup activities in summer/fall 2022 and will prepare closure reports and documentation in spring 2023. We see no impediment to completing this work within the three-year grant period.
- iii. Task/Activity Lead(s): The QEP will oversee this task, with assistance from OK.
- iv. Outputs: Air clearance documentation, MEDEP VRAP Closure Report, VRAP Certificate of Closure, Grant Closeout documentation.

3.c.i Development of Cost Estimates, 3.c.ii Application of Cost Estimates, & 3.c.iii Eligibility of Share Activities

Budget Categories		Project Tasks (\$)				
		CA Oversight	Community Outreach	Site Specific	Oversee Cleanup	Total
Direct Costs	Personnel	\$4,000	\$7,500	\$4,000	\$4,000	\$19,500
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$2,000	\$0	\$0	\$0	\$2,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$500	\$0	\$0	\$500
	Contractual	\$2,500	\$3,000	\$576,500	\$46,000	\$628,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$8,500	\$11,000	\$580,500	\$50,000	\$650,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$8,500	\$11,000	\$580,500	\$50,000	\$650,000
Cost Share		\$0	\$0	\$130,000	\$0	\$130,000
Total Budget		\$8,500	\$11,000	\$710,500	\$50,000	\$780,000

Task 1 - Cooperative Agreement Oversight: This task includes OK’s time for program development, organization, and support (40 hours @ \$50/hour = \$2,000); up to three meetings with the BCAC (28 hours @ \$50/hour = \$1,400); preparing bidding documents for QEP selection and interviewing/contracting with the QEP (12 hours @ \$50/hour = \$600); and for travel to the National Brownfields Conference (\$2,000 air/bus fare, lodging, and registration). QEP time associated with this task is estimated at \$2,500, which includes attendance at three BCAC meetings and programmatic support.

Task 2 - Community Outreach and Engagement: Costs under this task include OK staff (150 hours at \$50/hour = \$7,500) and QEP personnel time (estimated at \$3,000) to attend meetings, prepare presentations and materials, and respond to follow-up questions and comments solicited from the community. Outputs include up to two public meetings and preparation of public outreach deliverables (\$500 in supplies, advertising costs, production of flyers, etc.) to communicate site status and outcomes.

Task 3 - Site Specific Activities: OK’s outputs for this task include review of QEP documents and work plans, and communication with the MEDEP and EPA (80 hours at \$50/hour = \$4,000). Total QEP costs are estimated at \$38,000; outputs include Cleanup/Abatement Plans and Specifications (\$15,000), bidding documentation/bidding phase services (\$13,000), SSQAPP (\$8,000), coordination/communication with the MEDEP and EPA (\$2,000). Total abatement/cleanup costs to be funded through this grant are estimated to be \$800,000; contractor outputs including QEP costs, asbestos abatement, removal/disposal of PCB bulk product waste and universal waste; abatement of lead-based paint and mold-impacted building materials. 100% of the anticipated \$130,000 cost share will be provided in cash from OK as part of Site Specific Activities.

Task 4 - Oversee Site Cleanup: Includes OK time for oversight during cleanup/abatement activities (80 hours at \$50/hour = \$4,000). The QEP outputs will include overseeing cleanup/abatement activities and coordination with MEDEP (\$20,500), collection and laboratory

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analysis of confirmatory samples (\$2,000), preparing an Operations and Maintenance Plan (\$5,000) and a VRAP closure report (\$7,500), grant closeout documentation and reporting (\$4,000), and presenting at public meetings and BCAC meetings (\$7,000).

3.d Measuring Environmental Results

OK will track and evaluate progress through high quality, detailed quarterly reports outlining the project's progress in achieving outputs and results; and through frequent updating of the ACRES database (tasks complete/money spent/progress). OK will be in regular communication with the QEP, MEDEP and EPA through BCAC Meetings, construction meetings, and telephone calls to ensure the project stays on schedule, on budget, and there are no impediments in achieving the project outputs identified above in a timely manner.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

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

OK consists of industry experts with experience executing large scale projects, community engagement, marketing and social media, construction and contract management, risk management, cost control and environmental stewardship. This Brownfield Cleanup project will be completed in a timely, cost-efficient, and effective manner.

Steve Sanders, Director of Mill Site Redevelopment, is our Project Director and will have direct oversight of the management of this program. Mr. Sanders obtained a Bachelor of Science in Physics from Boston College in 1993. He is responsible for leading OK's Brownfields Cleanup Grants as well as their FY2020 Site Specific Assessment (>70% drawn down).

Mr. Sanders will be assisted by **Lucy Van Hook**. Ms. Van Hook is OK's Director of Community Development. She holds an M.S. in Climate Science and Policy from Bard College and a B.A in Biology from Bowdoin College. She will be in contact with the public and Target Area neighbors and will be instrumental in the public outreach/education portions of the process.

OK's President and Board Member **Sean DeWitt** who currently works as a Director at the World Resources Institute will be available to assist with the project. Sean holds a BSc in engineering from Purdue University and an MSc in Development Finance from the University of London and graduated from Stearns High School in Millinocket in 1993. Sean managed and administrated over \$6 million in federal and non-federal loans as part of the GNP redevelopment.

4.a.iii Acquiring Additional Resources

OK will manage a competitive procurement process in accordance with 40 CFR 30 through a Request for Proposals to solicit responses from qualified firms for oversight and engineering of the cleanup activities and to assist with community outreach and regulatory compliance. The project will be publicly bid and advertised via the newspaper, OK's website, and the Town of Millinocket's website. Abatement/cleanup contractors will be selected via a competitive bid process advertised in the same manner. OK will also seek the advice and support of the EPA and MEDEP staff for direction on programmatic requirements. OK and its selected QEP will liaison with the MEDEP to coordinate and oversee the completion of this cleanup. OK has routinely performed this type of procurement for development projects.

4.b Past Performance and Accomplishments

4. b. i Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments - OK received, managed, and closed out a \$200,000 FY2017 EPA Brownfield Cleanup grant for the 10,000+ square foot building located at 230 Penobscot Avenue in downtown Millinocket. This cleanup resulted in redevelopment interest and a proposed reuse to subdivide the building into co-working space. OK is in the process of facilitating a \$500,000 FY2020 Brownfield Cleanup grant for Administration Building and a \$500,000 FY2021 Cleanup of the Research Building on the GNP Campus, which includes removal and abatement of asbestos, lead-based paint, PCBs, mold and universal/hazardous waste, as well as a \$350,000 FY2020 Site-Specific Assessment Grant (>70% drawn down) for the 1,400-acre GNP campus.

(2) Compliance with Grant Requirements - OK has always submitted quarterly reports and ACRES updates on time and in accordance with all submittal requirements. All annual financial statements have been properly submitted. No submittal or tracking issues have been identified for any Brownfields cooperative agreements. Our Brownfield programs are being completed in accordance with our approved work plans, schedules and terms & conditions with no corrective actions issued.

Attachment B: Threshold Criteria

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III.B. Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

Our Katahdin is a non-profit organization and maintains tax-exempt status under section 501(c)(3) of the Internal Revenue Code and therefore is eligible to apply for Brownfields Cleanup funding from the U.S. Environmental Protection Agency (EPA). Documentation of tax-exempt status is included as *Attachment C* to the Narrative.

2. Previously Awarded Cleanup Grants

Our Katahdin affirms that it has not previously received a U.S. EPA Brownfield Cleanup Grant for the Engineering Building (the “Site”).

3. Site Ownership

Our Katahdin affirms: that it is the sole owner of the Site that is subject to this U.S. EPA Brownfield Cleanup Grant (the Engineering Building at the Former Great Northern Paper [GNP] Company Site, located at 1 Katahdin Avenue in Millinocket, Maine); that the property was obtained prior to October 28, 2020 (obtained via deed conveyance on November 24, 2019); and that Our Katahdin will maintain sole ownership of the property until the grant services are completed and the grant is closed out.

4. Basic Site Information

- a) Site Name: Engineering Building - Former Great Northern Paper Company
- b) Site Address: 1 Katahdin Ave., Millinocket, ME 04462
- c) Current Owner of the Site: Our Katahdin, 245 Aroostook Ave., Millinocket, ME 04462

5. Status and History of Contamination at the Site

- a) Type of Contamination: Hazardous Substances
- b) Operational History and Current Use(s) of the Site: At the time of the Engineering Building’s construction in the 1960’s, it was a modern, technologically-advanced building utilized as the engineering center for the GNP operations. The building covers an approximate ground footprint of 13,000 square feet and was utilized as the engineering center for the mill since its construction. The building has reportedly been unoccupied since 2008. The Engineering Building is a portion of, and located within, the former GNP Millinocket paper mill complex.
- c) Environmental Concerns: A Hazardous Building Materials Inventory (HBMI) was completed in March of 2018 at the Engineering Building by Nobis Group of Concord, New Hampshire as part of a Targeted Brownfields Assessment (TBA) on behalf of U.S. EPA. The report identified the presence of asbestos containing building materials (ACM), polychlorinated biphenyl (PCB)-containing building materials and fixtures; lead-based

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paint (LBP); mercury-containing equipment (thermostats, switches, etc.) and other universal wastes; and potentially hazardous levels of mold. On November 20, 2019, Ransom Consulting, LLC (Ransom) completed a Phase I Environmental Site Assessment (ESA) for the entire 1,400-acre Great Northern Paper Site (which included the Engineering Building) on behalf of Our Katahdin, as part of a Maine Department of Environmental Protection (MEDEP) Brownfields Assessment Grant. This ESA identified numerous Recognized Environmental Conditions at the Site pertaining to potentially impacted soil, groundwater, and soil vapor contamination; and identified the presence of hazardous building materials and mold in the Engineering Building.

- d) How the Site Became Contaminated / Nature and Extent of Contamination: At the time of the building's construction (and during subsequent renovations and improvements), asbestos-containing building materials, PCBs, lead-based paint, and other hazardous building materials were widely used in residential and commercial buildings. The use of these materials was considered acceptable practice.

The 2018 HBMI identified ACM which has the potential to pose an exposure risk to future site occupants and/or visitors, in the case of disturbance of ACM during building redevelopment or demolition activities. The materials that were positive for asbestos (concentrations equal to or greater than 1%) included: floor tile and associated mastic; sheet flooring; glue daubs; stair tread; and joint compound. The report also identified that PCB was present in caulks and paints at concentrations up to 49 milligrams per kilogram (mg/kg). Although these materials do not exceed the U.S. EPA-established threshold value of 50 mg/kg (above which materials are considered "Unauthorized Use" of PCBs and require removal and disposal as PCB Bulk Product Waste under 40 CFR 761.3); Our Katahdin proposes to remove these two materials for offsite disposal utilizing the proper site controls, worker protection, and waste disposal methods for a PCB Bulk Product Waste removal. Lead-based paint was also identified throughout the Engineering Building at concentrations exceeding the U.S. EPA threshold value for LBP under HUD (≥ 1.0 milligram/square centimeter (mg/cm²)); these components included walls, ceilings, floors, window and door components, piping/heating components, and building structural members. Handling of components coated with lead-containing paint at any concentration requires compliance with the Occupational Safety and Health Administration (OSHA) lead standard (Lead in Construction, 29 CFR 1926.62). The Engineering Building also contains universal wastes which may require special handling prior to future renovation or demolition activities, including fluorescent bulbs, fluorescent light fixture ballasts, thermostats, electronic devices, fire extinguishers, various containers of maintenance materials, and aboveground storage tanks. The previous HBMI also included an evaluation for hazardous levels of mold growth; certain areas had documented spore concentrations in excess of 1,000 counts/area. While there are no regulatory assessment limits or cleanup values under U.S. EPA or MEDEP, proper site controls, worker protection and waste handling methods will need to be implemented during removal and disposal of mold-impacted materials.

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6. Brownfields Site Definition

The Site meets the definition of a Brownfield under CERCLA 101 (39) and is eligible for Brownfield Grant funding. Our Katahdin affirms that the Site is:

- (a) Not listed or proposed for listing on the National Priorities List;
- (b) Not 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
- (c) Not subject to the jurisdiction, custody, or control of the United States government.

7. Environmental Assessment Required for Cleanup Grant Proposals

On March 2, 2018, Nobis completed a Targeted Brownfield Assessment for the U.S. EPA under contract No. EP-S1-06-03, Task Order No. 0108-SI-BZ-0100. This report presents the results of the Hazardous Materials Building Survey conducted at the Engineering Building and met the requirements for a Phase II environmental site assessment report. As part of this assessment, Nobis performed a Hazardous Materials Building Survey to identify and quantify hazardous and/or regulated building materials within the Engineering Building.

On November 20, 2019, Ransom completed a Phase I ESA in accordance with ASTM E1527-13 for the entire 1,400-acre Great Northern Paper Site (which included the Engineering Building) on behalf of Our Katahdin, as part of a MEDEP Brownfield Assessment Grant. Under MEDEP’s scope of work, Ransom completed remedial planning and an Analysis of Brownfields Cleanup Alternatives (ABCA).

8. Enforcement or Other Actions

There are no ongoing or anticipated environmental enforcement actions, other actions, orders, or local, state, or federal inquiries for the Site. Furthermore, the applicant is not aware of any current records of judgments, liens, or other enforcement actions regarding this site.

9. Sites Requiring a Property-Specific Determination

A property-specific eligibility determination is not required for this site.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is contaminated with hazardous substances, as such, Our Katahdin is responding to all items under a.

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY – N/A

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ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY – N/A

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

- (i) How you acquired ownership: Our Katahdin acquired the property via deed conveyance from GNP West Inc.
- (ii) Date you acquired the property: November 24, 2019
- (iii) Nature of Ownership: Fee Simple Ownership
- (iv) Name and identity of the party from whom you acquired ownership: GNP West Inc., a Delaware C-corporation that was acquired by Our Katahdin in January 2017 from the former owner Cate Street Capital.
- (v) Familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators: Our Katahdin is the sole shareholder in the former deed holder, GNP West Inc. Our Katahdin has no familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators of GNP West Inc.

(b) Pre-Purchase Inquiry

- (i) Site assessments performed – Type of assessment, date of assessment, and the entity for which they were performed: Under the U.S. EPA Remedial Action Contract No. EP-S1-06-03, Task Order No. 0108-SE-BZ-0100, Nobis completed a Phase I ESA for the entire 1,400-acre Great Northern Paper Site on behalf of the U.S. EPA (which included the Engineering Building), dated May 23, 2019. A HBMI of the Engineering Building was also completed by Nobis Group on behalf of U.S. EPA on March 2, 2018. Additionally, Ransom prepared a Phase I ESA for the entire 1,400-acre Great Northern Paper Site (which includes the Engineering Building) on November 20, 2019, directly on behalf of Our Katahdin. Both the Nobis and the Ransom Phase I ESAs were performed in accordance with ASTM E1527-13, Standard Practice for Environmental Site Assessments, and the Standards for Conducting All Appropriate Inquiry (AAI) under the United States Code of Federal Regulations (CFR), Title 40, Part 312.
- (ii) Qualifications of firm performing assessments: Ransom is an engineering and consulting firm located in Portland, Maine, with over 30 years of professional experience conducting U.S. EPA and privately-funded Brownfield Assessments; in the past 15 years, the Ransom team has worked successfully on nearly 200 U.S. EPA-funded Brownfield sites in New England. The Nobis Group was founded in 1988 and is an integrated consulting firm providing engineering and environmental services; Nobis professionals are experts in site investigation and remediation for infrastructure, Brownfields, and energy projects, as well as more than one hundred Superfund sites.

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(iii) Ransom’s Phase I ESA, dated November 20, 2019, was completed within 180 days prior to our acquisition of the property.

- (c) Timing and/or Contribution Toward Hazardous Substances Disposal: According to historic records, the Engineering Building was constructed in the 1960s. The contaminants of concern in the form of hazardous building materials originated in the building at the time of construction, maintenance, and/or repairs by previous owners. All disposal of hazardous substances at the site occurred prior to Our Katahdin acquiring the property on November 24, 2019. Our Katahdin has not caused or contributed to any release of hazardous substances at the site. We affirm that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- (d) Post-Acquisition Uses: Since property acquisition on November 24, 2019, Our Katahdin has maintained and secured the Engineering Building. The Site building is currently vacant and unused and has been vacant/unused since our acquisition.
- (e) Continuing Obligations: Since acquiring ownership of the property on November 24, 2019, Our Katahdin has demonstrated appropriate care and taken reasonable steps in addressing the identified on-Site contamination to (i) stop any continuing releases; (ii) prevent any threatened future release; and (iii) prevent or limit exposure to any previously released hazardous substance. No significant repairs, renovations, or modification to the site, resulting in a release of the hazardous building materials to the environment, has occurred, or is planned. Access to the property (security fence) and the site building is restricted and limited to authorized personnel only. Furthermore, the property and area are routinely patrolled by the local police department.

Currently, and during proposed future developments at the site, Our Katahdin will (i) comply with land use restrictions and will not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the assessment and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

11. Cleanup Authority and Oversight Structure

- a. Cleanup Oversight Plan: Our Katahdin will ensure that the cleanup of hazardous substances at the site will comply with applicable local, state, and federal laws and regulations, and that the cleanup actions will be protective of human health and the environment. Our Katahdin will competitively bid and retain a qualified environmental professional (QEP) in accordance with the competitive procurement provisions of 40 CFR Part 30 (for non-profit organizations). The QEP will work with Our Katahdin to design, prepare specifications and bidding documents, and oversee and document remediation activities at the site, as well as to assist with the interface between the Town of

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Millinocket, MEDEP, and EPA. The QEP will also assist with the competitive bid process for selecting an environmental cleanup contractor to perform the proposed cleanup actions. Our Katahdin will contract with the selected QEP and environmental cleanup contractor prior to initiating cleanup activities. The site will also be entered into the MEDEP Voluntary Response Action Program (VRAP).

- b. Access Plan for Adjacent or Neighboring Properties: Our Katahdin views the adjacent property owners as project stakeholders and cooperative partners in the proposed cleanup actions at the site. We will be in frequent communication with these property owners prior to and during cleanup activities. At this time, the proposed cleanup activities are limited to the site and are not anticipated to extend to adjacent properties. However, if the proposed cleanup or confirmatory sampling/monitoring requires access to the adjacent properties, a formal written access agreement will be obtained from the adjoining property owners, if necessary. Furthermore, the Town of Millinocket and the MEDEP have the regulatory authority to access adjacent properties for emergency situations.

12. Community Notification

Our Katahdin has fulfilled the community notification requirements for the site.

- a. Draft Analysis of Brownfields Cleanup Alternatives: An Analysis of Brownfields Cleanup Alternatives - Preliminary Evaluation (which includes a description of the site, contamination, and cleanup standards/laws; a description of cleanup alternatives evaluated; and a description of the proposed cleanup) was prepared prior to the public notice and public meeting. The draft ABCA and draft grant proposal were made available for public review on-line and at the Our Katahdin offices during regular business hours. The public comment period closed at end of business day (5:00 pm) on November 23, 2021.
- b. Community Notification Ad: Our Katahdin published a community notification ad in the *Lincoln News* on November 11, 2021. This advertisement stated that a copy of the draft ABCA and draft grant proposal were available for public review and comment; provided instructions for commenting on these draft documents; identified the location where the draft documents were located for review; and presented the date and time of the public meeting.
- c. Public Meeting: Our Katahdin held a public meeting at 5:30 p.m. on November 15, 2021 using Zoom video conferencing (due to COVID-19). The purpose of the meeting was to discuss the draft grant proposal, draft ABCA (documents were posted on Our Katahdin's website prior to the meeting), and consider public comments prior to submittal of this grant proposal.
- d. Submission of Community Notification Documents: The following items are included in ***Attachment D***:
 - 1) A copy of the draft ABCA-Preliminary Evaluation;
 - 2) A copy of the newspaper advertisement demonstrating notification to the public and

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- solicitation for comments on the proposal;
- 3) A summary of the questions/comments received, responses to the questions/comments, and applicable meeting notes from the public meeting (No Questions/Comments Received); and
- 4) A sign-in sheet/Zoom photo of participants from the public meeting.

13. Statutory Cost Share

- a. Sources of Required Cost Share: Although Our Katahdin will be requesting a cost share waiver (see below), if necessary, we are fully committed to providing the requisite 20% cost share up to \$100,000 (based on a \$500,000 cleanup grant request) toward eligible cleanup activities in the form of cash contribution and in-kind services. Our Katahdin will also seek opportunities to augment matching funds in the form of a contribution of labor, materials, and/or services from a non-federal source including in-kind services, program development, oversight, and documentation.
- b. Hardship Waiver Request: Our Katahdin, a non-profit organization, is requesting a Hardship Waiver of the requisite 20% cost share associated with this U.S. EPA Cleanup grant. A justification for the waiver request is included as ***Attachment E*** to the Narrative.