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June 28, 2022

Project 181.06095

Mr. Jeremy Martin, Planning & Development Director
Town of Camden
29 Elm Street, PO Box 1207
Camden, Maine 04843

Re: Apollo Tannery Brownfields Cleanup Program
Camden, Maine

Dear Mr. Martin:

Ransom Consulting, LLC (Ransom) has prepared this letter in response to your inquiry as to whether areas of the Apollo Tannery (the "Site") should be fenced.

The Apollo Tannery is located at 116 Washington Street in the Town of Camden, Knox County, Maine and had a long history of industrial use as a tannery and has been the focus of many environmental assessment and investigations. A portion of the Site was cleaned up by the Town in 2008 utilizing an United States Environmental Protection Agency (U.S. EPA) Brownfield Cleanup Grant. Following this 2008 remediation, the southern and central portion of the Site was issued a Certificate of Completion (COC) from Maine Department of Environmental Protection (MEDEP) Voluntary Remedial Action Program (VRAP). After the cleanup, the Town of Camden attempted to sell and market the property but received little interest despite a portion of the Site receiving a COC.

In 2015 and 2016, the Town of Camden requested the Midcoast Economic Development District (MCEDD) Brownfield Assessment program complete additional assessments on the property focused on the area outside of the 2008 cleanup area boundary (outside of the COC area). In 2016, a Phase II ESA was completed that identified the presence of low-level contaminants in surficial and subsurface soils in the northern triangle of the Site which was outside of the VRAP COC area. At that time, concentrations of benzo(a) pyrene and arsenic were detected in surficial soils in this area of the Site ("the northern upland area") that exceeded their applicable MEDEP Remedial Action Guidelines (RAGs) at that time. The results of this assessment were used by the Town to secure additional U.S. EPA Brownfield Cleanup funding for the Site areas that were beyond the VRAP COC. In 2018 and 2021, the MEDEP revised the State's RAGs using updated toxicological information and data, and the 2016 Phase II results now indicates exceedances of MEDEP RAGs for lead and arsenic in surficial soils located in these northern upland areas. Despite exceeding the MEDEP RAGs, the concentration of arsenic detected in these areas are at levels found to be naturally occurring in the State of Maine.

After receiving the current cleanup grant, the Town requested that the U.S. EPA complete further assessment within the VRAP COC area. Analytical results from this 2021 U.S. EPA sampling identified extractable petroleum hydrocarbons (EPH) compounds, various poly aromatic hydrocarbons (PAHs) identified as part of the EPH analysis, and arsenic and lead at concentration above MEDEP RAGs in two locations in the COC area ("the riverwalk areas").

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Mr. Jeremy Martin
Town of Camden

Based on this, the Town of Camden is planning to utilize the U.S. EPA cleanup grant to remediate the northern upland and riverwalk areas of the site with identified RAG exceedances. As part of continuing obligations of an innocent landowner necessary to secure and remain eligible for the U.S. EPA Brownfield Cleanup Funding, Camden had agreed to limit exposure to any previously released substances. Until this cleanup is completed, Ransom recommends that public access to these soils be restricted. We would recommend that fencing or some other barriers be temporarily installed to reduce the likelihood of contact with these soils in the northern upland areas and the two riverwalk areas.

If you have any questions or require further information regarding this, please contact us at (207) 772-2891 or by e-mail.

Sincerely,

RANSOM CONSULTING, LLC



Stephen J. Dyer, P.E.
Principal / Senior Project Manager



Nicholas O. Sabatine, P.G.
Vice President / Senior Geologist