COMMUNITY RELATIONS PLAN
FORMER FORSTER MILL SITE
581 DEPOT STREET
WILTON, MAINE

Prepared for:

Town of Wilton, Maine
158 Weld Road
Wilton, Maine 04294

Prepared by:

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Project 131.06018
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Grant Number A00206

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1.0 OVERVIEW OF THE COMMUNITY RELATIONS PLAN

The Town of Wilton (Town) has been awarded a Brownfields Cleanup Grant (Grant Number A00206) in the amount of $200,000 from the United States Environmental Protection Agency (U.S. EPA) for the Forster Manufacturing property located at 581 Depot Street in Wilton, Maine (the Site). This cleanup grant provides the Town with the opportunity to continue building upon several phases of successful Maine Department of Environmental Protection (MEDEP) and Androscoggin Valley Council of Governments (AVCOG) funded Brownfields Assessment and Cleanup projects. The purpose of this Community Relations Plan is to describe the Town's strategy to address the needs and concerns of the community and residents who will potentially be affected by the proposed remediation and redevelopment at the Site. This Community Relations Plan outlines how the Town has involved, and will continue to involve, affected residents, Town officials, and local organizations in the decision-making process regarding the cleanup and redevelopment at the Site.

Community organizations (COs) and active residents involved in neighborhood issues are important resources for the success of the Community Relations Plan because they have an understanding of the Site area and they hold positions of responsibility within the community. The owners and developers of the Site regard these citizens as key points of contact and communication. The long-term success of the redevelopment of the Site will be enhanced by informed citizen involvement in each step of the cleanup and redevelopment process.

2.0 SPOKESPERSON AND INFORMATION REPOSITORY

The Spokesperson for this project is Town Manager Rhonda Irish, representative of the Town, who may be contacted at:

Rhonda Irish, Town Manager
Town of Wilton
158 Weld Road, Wilton, Maine 04294
Phone: 207-645-4961
Email: manager@wiltonmaine.org

The information repository for this project, including the environmental assessments, remediation plans, and other environmental information is located at the following locations:

Town of Wilton
c/o Rhonda Irish, Town Manager
158 Weld Road, Wilton, Maine 04294
Phone: 207-645-4961

Town Office Hours: 8:30 AM to 4:30 PM on Monday and Tuesday, and 9:00 AM to 5:00 PM on Thursday and Friday. Closed on Wednesdays

and

Online: http://wiltonmaine.org/depts-offices/forster-mill-epa-brownfield-project/

and

Ransom Consulting, Inc.
400 Commercial Street, Suite 404
Portland, Maine 04101
Phone: (207) 772-2891

Office Hours: 8:00 AM to 5:00 PM, Monday through Friday

This information is available for viewing during business hours. Under Maine's Freedom of Access law and MEDEP and U.S. EPA policies, the same information is available at the MEDEP and U.S. EPA offices:

Maine Department of Environmental Protection
Tracy Kelly, Brownfields Project Manager
Bureau of Remediation and Waste Management
State House Station 17
28 Tyson Drive
Augusta, Maine 04333-0017
Phone: (207) 287-4858
Email: Tracy.W.Kelly@maine.gov

United States Environmental Protection Agency
Amy Jean McKeown, Brownfields Project Officer
U.S. EPA - Region I
5 Post Office Sq. Suite 100
Mail Code OSRR07-2
Boston, MA 02109-3912
Phone: 617-918-1248
Email: mckeown.amyjean@epa.gov

Most public meetings will be held at the Wilton Town Office, at the following address:

Wilton Town Office
158 Weld Road
Wilton, Maine 04294
Phone: 207-645-4961

In addition, some public meetings may be held directly at the Site in order to facilitate first-hand observations and discussions about a particular cleanup and/or redevelopment activity or scenario:

Former Forster Manufacturing Site
581 Depot Street
Wilton, ME 04294

3.0 SITE DESCRIPTION

3.1 Site Location and History

The Site, known as the Forster Manufacturing Property, is identified by the Town of Wilton's Assessor's Office as Lot 094 on Tax Map 5, which corresponds to a street address of 581 Depot Street in the Town of Wilton, Maine. The Site is located on the southern side of Depot Street, and is abutted to the east, south and west by Wilson Stream. The Site is a portion of a larger parcel of land, encompassing 17.65 acres, which is located on both the northern and southern sides of Wilson Stream, between Depot Street and Village View Street. For the purposes of this project, portions of the property located on the southern side of Wilson Stream (undeveloped wooded areas) are considered adjacent properties.

The former Forster Mill is a 232,000 square-foot set of interconnected wood buildings, located at 581 Depot Street, also known as State Route 156, one half mile from U.S. Route 2, the region's major transportation route. The site was the originally the home of the Wilton Woolen Mill Construction of the Wilton Woolen Mill was completed in 1901 at the site of a former canning factory. In 1903 Frank G. and George F. Goodspeed, owners of Wilton's first complete textile mill, formed a corporation with their father, known as the Wilton Woolen company.

The Goodspeeds produced a successful product called cashmerette, a cotton wrap fabric, and the Wilton Woolen mill was the sole manufacturer of this product. (black cloth top, popular on overshoes until rubber shoes became popular). Because the cashmerette overshoe was only manufactured in Wilton until 1924, demands on the production facility were increasingly great.

The father's death resulted in the plant being operated by the two sons from 1910 to 1920. In the later year, George Goodspeed purchased the plant from his brother and operated it as the sole owner until his death in 1942. This did not mark the end of the Wilton Woolen mill: a group of local men, possessed with a general interest in the welfare of the community, bought the woolen mill from the Goodspeed estate. The group was headed by Earl B. Foss and Roy G. Gifford. Others in the group were Charles C. Swett, E. Francis Egan, and M. Parker Abbott. These men carried on the business under the same successful policies established by the previous owner and manufactured the same type of products. These Wilton Woolen Mill officials were public-spirited and during their ownership tenure they donated $100,000 to the building of the Wilton Academy gymnasium and community center.

When the demand for cashmerette began to slacken off appreciably in 1924, the mill turned to production of automobile upholstery and women's wear fabrics. The bulk was in automobile upholstery as this provided a stable, assured market (with the exception of two years during WWII). In the year of 1950, approximately 10 million yards of various textile products were manufactured for the armed services and lend-lease. The Army-Navy "E" Flag was awarded the Wilton Woolen Company in 1942, and four stars for the excellent work was awarded every year after (at least till 1950).

From the end of the war, car upholstery manufacturing was on the rise, used for the side-walls of the inside of cars, the backs of the front seats, and for head lining in the more expensive models. The sidewall upholstery was used in all General Motors, Chrysler and Ford models, as well as most of the small independent manufacturers. The Wilton Woolen mill was not the only company supplying this material to automobile manufacturers, but turns out approximately 50% of the cotton wrap material was used by them. A number of the larger firms did not specialize in this particular fabric.

Women's wear woolens never played a prominent part in production due to lack of market stability, but when the market was favorable, cloth for suits, skirts and dresses was produced.
The owners were faced with trying to operate favorably when selling prices were frozen, but the costs of wool, which were not controlled, kept increasing.

The Wilton Woolen Mill closed down in the 1955. It was operated under other ownership for several years, after which the huge plant stood idle until its purchase by the Forster Manufacturing Company in 1960. Forster employed a working force of three hundred and thirty with one hundred more employed in the office. Part of a large company, the Wilton plant manufactured croquet sets and custom turnings, assembled snap clothespins, and contained the folding carton division, general offices, and central warehouse for the company.

In September 1985, Forster Manufacturing Company announced that all of its five plants in Maine would be sold. Workers said Forster's, like other companies in the wood turning business, were faced with severe foreign competition. Some workers credited management with "keeping above the water" for this long.

Forster was eventually bought out by another company and moved west. Plastic cutlery-producing Jarden's would slide into place for a few years before vacating the aging building for new facilities in East Wilton.

Jarden Corp announced the plant would close in 2003. The property was sold to Kenneth Bustin. In 2004, the property was transferred to Adam Mack, as the principle owner.

Since 2004, the mill sits vacant, beyond repair, and continues to deteriorate. In 2012, the Site owner, Adam Mack, made arrangements with a company called Downeast Construction to dismantle the entire mill property. During this deconstruction, a fire started from the welding of metal beams, and subsequent inspections from the Occupational Safety and Health Administration (OSHA) discovered that both Downeast Construction and the Site owner had failed to remediate any environmental hazards at the site. Asbestos was found scattered throughout the partially dismantled site and workers were not outfitted with proper safety equipment. The MEDEP and federal agencies became involved, with the state's Lead and Asbestos Hazard Prevention Program staff calling it "one of the worst asbestos cases" they had ever seen. The U.S. EPA subsequently inspected the building and worked with the MEDEP to hire an asbestos abatement contractor to remove friable exterior asbestos. Downeast Construction and the Site owner, Adam Mack, were issued significant fines by both OSHA and the MEDEP.

After demolition activities ceased, the Site buildings were secured and the site was fenced off. The Town of Wilton and MEDEP continued efforts to work with the Site owner to continue the asbestos cleanup and complete the demolition of the mill. These efforts stalled, and the Town obtained ownership of the site in March of 2015 through non-payment of property taxes.

3.2 Proposed Cleanup Plan

An Analysis of Brownfields Cleanup Alternatives (ABCA) was developed for the Site to evaluate various remedial alternatives for the environmental conditions identified at the Site (included in the information repository for the Site).

Based on the proposed future use of the Site for mixed commercial and light industrial purposes, and the final cleanup goal for the Site to minimize the risk of human exposure to contaminated surficial soils and hazardous building materials at the Site, the ABCA recommended two separate remedial alternatives.

To address impacted soils onsite, the ABCA recommended that soil cover systems be installed. As part of this alternative, institutional controls/deed restrictions will be necessary to protect the cover systems; implement of a Soil Management Plan and Post-Closure Cover System Maintenance Plan; and require that the Site be entered into the MEDEP VRAP. We anticipate that these cover systems will be installed at a later date, as part of final Site redevelopment.

To address hazardous building materials, including asbestos containing materials (ACM), the ABCA recommended abatement of materials in conjunction with building demolition. This alternative involves abating safely-accessible ACM prior to building demolition; and abating remaining ACM, ACM roofing materials, and lead-based paint concurrently with building demolition. During building demolition, floor drains/sumps/etc. would be disconnected and decommissioned (as necessary) and the sediment contained within the floor drains would be properly managed and disposed. This alternative may be implemented in a phased approach, as funds become available. It should be noted that due to safety concerns, the "Abatement and Building Demolition" alternative must be completed prior to implementation of the "Soil Cover System" alternative.

These alternatives protect human health and the environment; and are effective, technically feasible, and practical.

3.3 Future Site Use

The proposed reuse and redevelopment plan has not been fully defined at this time, but likely includes partial building demolition and redevelopment of portions of the Site for manufacturing, commercial or industrial uses. Specific Site redevelopment plans are in the process of being evaluated.

3.4 Surrounding Land Use

Land use in the vicinity of the Site is a mix of vacant/wooded, commercial and residential. The Site is abutted to the east, south and west by Wilson Stream. The Site is abutted to the north by Depot Street, beyond which are residential houses and a paved parking area (formerly used for Forster employee parking).

3.5 Summary of Environmental Conditions and Historic Environmental Assessments

"Site Assessment for the Forster Manufacturing Facility No. 6 Oil Concrete Vault Located in Wilton, Maine," Morrison Geotechnical Engineering (Morrison), October 1992.

Morrison completed a site assessment for the abandonment-in-place of the concrete 100,000-gallon No. 6 fuel oil vault located in the northern portion of the Site. According to the Morrison Report, at the time the underground storage tank (UST) was abandoned, evidence of cracking in the vault walls and floor was observed; however, all cracks were reportedly sealed. Two soil samples were collected from beneath the base of the vault. These two soil samples were field-screened, and the volatile headspace readings were reportedly both non-detect. No confirmatory laboratory samples were collected. According to Morrison, there were "no visual signs of uncontrolled oil around the vault area." Based on these observations,

Morrison concluded that there was no evidence to indicate that this oil storage vault had adversely impacted environmental conditions at the Site. No information on the actual tank abandonment was provided in this report.

"Phase I Environmental Site Assessment, Diamond Brands, Inc. Wilton, Maine," Shield Environmental Associates, Inc., September 2002.

Shield completed a Phase I ESA for the Site, and identified the following Recognized Environmental Conditions (RECs): 1) the presence of suspect ACM on the fourth floor of the Site building; 2) the historical use of the Site as a woolen mill and historical on-site coal and oil storage; 3) closed floor drains in an on-site service garage which historically discharged directly to Wilson Stream; 4) a 100,000-gallon concrete fuel oil storage vault which was abandoned-in-place in 1992, and the historical presence of a 12,000-gallon fuel oil tank inside of that vault; 5) the presence and former use of a hazardous waste room in the Site building; and 6) potential impacts from off-site properties, including two leaking underground storage tank (LUST) facilities and 21 UST facilities.

During their Site reconnaissance, Shield observed the presence of four 275-gallon and one 250-gallon No. 6 fuel oil aboveground storage tanks (ASTs) at the Site. Additionally, drums of oils, detergents, alcohol, waste ink, and other hazardous materials/universal waste were observed by Shield at the Site. It should be noted that the Site was operational at the time of Shield's report.

As part of their assessment, Shield reviewed the following historical environmental reports: a 1992 GZA Phase I ESA; a 1992 GZA Phase II Investigation; a 1995 GZA Environmental Site Evaluation Update; and a 1998 EMCON Phase I ESA. *[It should be noted that Ransom was not able to locate copies of these reports during the MEDEP file review, and copies of these reports were not included in the Shield ESA appendices. The following paragraphs present Ransom's overview of the report summaries, as presented in the Shield ESA.]*

- 1992 GZA Phase I ESA: As part of the 1992 ESA, GZA reportedly documented the following air emission sources at the Site: a wood-fired boiler; wood milling and conveying equipment used in croquet mallet production; and drying ovens used to dry volatile organic compounds (VOC)-based lacquers and paints on croquet mallets. GZA also reportedly documented the fact that the plant discharged cooling water, condensate, and stormwater directly to Wilson Stream. At the time of GZA's site reconnaissance, paints, lacquers, water-based coatings, solvents, printing chemicals, boiler conditioning acids, ignitable solvents/inks, corrosive chemicals, and lubricating and hydraulic oils were reportedly observed throughout the Site building. At the time of the 1992 GZA ESA, the plant was a Class 2, Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) of Hazardous Waste; and a hazardous waste storage area was reportedly observed on the second floor. GZA further identified potential on-site contamination from the historical 100,000-gallon concrete oil vault, incidental and historical spills/releases, historical industrial site use, historical industrial use on up-gradient properties, and historical discharge of boiler blow-down water to soils. GZA also reportedly identified compliance issues including opacity limit violations from the boiler, discharge of wastewater to Wilson Stream, National Pollution Discharge Elimination System (NPDES) stormwater violations due to roof drains, hazardous waste labeling violations, hazardous waste storage and disposal violations, improper storage and disposal of wood ash, and improper disposal of hazardous waste to the Wilton landfill.

- 1992 GZA Phase II Investigation: As part of this investigation, GZA reportedly collected soil samples, groundwater samples, surface water samples, and sediment samples at the Site. Shield reports that the soil samples were field screened, and that GZA identified no evidence of VOC contamination. Two groundwater and three surface water samples were reportedly collected; these samples reportedly did not contain VOCs, volatile petroleum hydrocarbons (VPH), semi-volatile organic compounds (SVOCs), metals, or cyanide at concentrations which exceeded applicable regulatory guidelines; however, it was reported that iron and manganese were detected at concentrations which exceeded secondary drinking water standards. Three sediment samples were reportedly collected from Wilson Stream and submitted for laboratory analysis of VOCs, SVOCs, metals and cyanide. These sediment samples reportedly contained concentrations of polycyclic aromatic hydrocarbons (PAHs) and dibenzofurans "which ranged from 4.4 to 69.4 mg/kg". According to Shield, GZA reportedly concluded that oil and hazardous substances had not impacted groundwater or surface water at the Site; and that the elevated contaminant concentrations in on-site sediments were consistent with typical background concentrations in historically industrial areas. GZA further concluded that the Site did not pose a threat to public or private water supplies.

- 1995 GZA Site Evaluation Update: During this update, GZA reportedly observed generally the same chemicals at the Site as they had observed in 1992, and reportedly identified the same RECs as were outlined in the 1992 GZA ESA. GZA reportedly collected groundwater samples from previously-installed monitoring wells, and found that they were not impacted by VOCs or VPH.

- 1998 EMCON Phase I ESA: According to Shield, the 1998 EMCON ESA identified RECs at the Site which included: potential contamination associated with the 100,000-gallon oil storage vault; historical on-site activities including oil and coal storage, and the historical use of dyes; housekeeping concerns associated with hazardous materials on-site; floor drains in the service garage which discharge directly to Wilson Stream; historical emissions from on-site sources; suspect ACM; and the lack of a stormwater pollution prevention plan.

<u>"ASTM Phase I Environmental Site Assessment, Forster Manufacturing, 81 Depot Street, Wilton, Maine, Revision 1," prepared by Ransom, dated June 29, 2015.</u>

Ransom completed a Phase I ESA on behalf of the MEDEP in June of 2015. On May 15, 2015, Ransom conducted a reconnaissance of the Site. Several items of environmental concern were observed:

- Drums, containers and hazardous materials were observed throughout the Site buildings, including the metal storage building, the Photo Shed, and throughout the main manufacturing building. Some of these containers contained unknown liquids, and many of these containers were unlabeled, rusted, leaking and/or in poor condition. Staining was observed on the floors in the vicinity of these containers.

- Floor drains, sumps, and open penstocks were observed throughout the basement of the main manufacturing building. These drains currently/historically have discharged directly to Wilson Stream. Widespread staining, drums and containers (some of which

showed evidence of leaking), and evidence of dumping were observed in the general vicinity of the floor drains/sumps. Ransom walked along the banks of Wilson Stream, beneath the manufacturing building, and observed dozens of pipes and drains which currently/historically discharged from the building into Wilson Stream. Black staining was observed on the banks of Wilson Stream, beneath identified outfall pipes, which suggest that hazardous materials may have been discharged historically onto the banks of the stream, or into the stream itself.

- Fill and vent pipes were observed on the northern exterior wall of the main manufacturing building. These pipes were cut inside of the basement. No staining or discernible odors were observed in connection with these former fill and vent pipes.

- Significant amounts of black oily staining were observed on walls, floor and ceilings throughout the main manufacturing building. This staining is presumed to be from former Site operations.

- Three open-top dumpsters/roll-off containers on-site were observed at the Site. Two were filled with construction and demolition debris and general solid waste, and one had asbestos placarding and contained apparent ACM waste. The asbestos dumpster has reportedly been removed as of the date of this report. Staining on the ground beneath these dumpsters suggests that stormwater which is trapped in these containers eventually discharges overland towards Wilson Stream.

- Stormwater on the Site is expected to flow overland towards Wilson Stream, or into one of several on-site catch basins. Catch basins at the Site are piped directly to Wilson Stream, or into one of the penstocks/tail races which run beneath the main manufacturing building. No provisions for pre-treatment of stormwater runoff were observed or historically noted at the Site. Roof drains also discharged directly to Wilson Stream. There is no record that the facility ever maintained a Stormwater Pollution Prevention Plan (SWPPP).

- Concrete pads which supported two historical stacks were observed in the northern portion of the Site. Ransom observed that beneath each of these pads, there was a space in which ash and material was collected and could be removed.

As part of this Phase I ESA, Ransom identified RECs which included the following:

1. The main manufacturing building has been used for industrial purposes since 1902, including a woolen mill; a manufacturer of croquet sets, clothespins, and toothpicks; and a printing/packaging facility. The historical industrial use of the Site building has the potential to have impacted soil, groundwater, sediments, pore water, and soil vapor at the site.

2. The main manufacturing building has been historically heated by coal, wood and oil-fired boilers. The Site formerly maintained a 1,000-gallon gasoline UST, which was removed in 1986, and a concrete 100,000-gallon No. 6 fuel oil UST, which was abandoned-in-place in 1992. The exact location of the 1,000-gallon UST is unknown. As part of the abandonment-in-place of the 100,000-gallon UST, no soil samples were collected for

laboratory analysis. Additionally, a 12,000-gallon No. 4 fuel oil AST was historically located inside the 100,000-gallon concrete vault; and in 2002, Shield observed the presence of four 275-gallon and one 250-gallon No. 6 fuel oil ASTs at the Site. The exact location of these ASTs is unknown.

3. The Site is currently identified as a RCRA Small Quantity Generator (SQG), and prior to 1997, the Site was classified as a RCRA LQG. The facility formerly used and generated hazardous wastes including: spent cleaning solvents and hazardous flammable substances (methyl ethyl ketone, alcohol, acetone, toluene, and butyl acetate); VOC-based paint, lacquer, and spray booth-related hazardous wastes; dyes and inks; polychlorinated biphenyls (PCB)-contaminated material (transformers, capacitors, switches and ballasts); and two Safety-Keen parts cleaners with 35-gallon and 5-gallon reservoirs containing spent solvents. Hazardous wastes were stored on-site in the finishing department on the second floor of the main manufacturing building, the paint/spray booth area and a former maintenance shop on the first floor of the main manufacturing building, the hazardous waste storage area and the machine shop area located in the basement of the main manufacturing building, in the "motor and electrical equipment storage area at ground floor level at the rear of the mill complex," and a "wood-framed building adjacent to the warehouse shipping area" (presumed Photo Shed).

4. The Site formerly maintained air emission licenses, and MEDEP correspondence indicates that the facility formerly burned solvent wastes (lacquer thinner, acetone, methyl ethyl ketone, butyl acetate, ethyl acetate and toluene), waste engine oil, and garbage in the wood-fired boiler. The MEDEP also documented historical violations associated with smokestack opacity limits, smokestack height, and downwash conditions. Potentially contaminated ash remains on-site beneath the concrete pads in the northern portion of the Site which formerly supported two historical stacks.

5. Floor drains, sumps, and open penstocks were observed throughout the basement of the main manufacturing building. Widespread staining, drums and containers, and evidence of dumping were observed in the general vicinity of theses drains. It is likely that all of these drains discharged directly to Wilson Stream. Additionally, based on conversations with the Wilton wastewater department, it is known that the facility formerly discharged process water, condensate and cooling water, and pre-1978 sewer discharges directly to Wilson Stream. Ransom observed dozens of pipes and drains which currently/historically discharged from the building into Wilson Stream. Black staining was observed on the banks of Wilson Stream, beneath this portion of the building, which suggest that hazardous materials may have been discharged historically onto the banks of the stream, or into the stream itself. Historical environmental assessments, conducted by GZA is 1992, identified elevated concentrations of PAHs and dibenzofurans in on-site stream sediments.

6. According to Code Enforcement Office files, during the partial demolition of the main manufacturing building in 2011, the MEDEP permitted that construction and demolition debris from the building could be disposed on-site within a "cellar hole." The demolition was later stopped due to friable asbestos being co-mingled with demolition debris. Abatement Professionals subsequently completed a partial asbestos abatement of exterior portions of the Site; however, it is likely that asbestos containing materials remain on-site in the main manufacturing building, and in on-site soils. The ACM present in the main

manufacturing building has been address in the Hazardous Building Materials Survey, which was conducted by Ransom concurrently with this ESA. However, there is the potential that ACM was disposed in the "cellar hole" on-site. The exact location of this "cellar hole" is unknown.

7. During Ransom's Site reconnaissance, 55-gallon drums, 5-gallon buckets, miscellaneous containers, and hazardous materials were observed throughout the Site buildings, in locations including: the metal storage building; the Photo Shed; the main manufacturing building basement; and the boiler room. Many of these containers contained unknown liquids, were unlabeled, or were in poor condition (rusted, leaking, etc.). Widespread staining was observed on the floors throughout the main manufacturing building, potentially in connection with these containers.

8. Extensive black oily staining, assumed to be related to historical Site operations processes, was observed throughout the main manufacturing building, on the floors, ceilings and walls. Based on the age of the building, there is the potential that hydraulic oil used as part of historical Site operations contained PCBs.

9. Three open-top dumpsters/roll-off containers on-site were observed at the Site. Two were filled with construction and demolition debris and general solid waste, and one had asbestos placarding and contained apparent ACM waste. The asbestos dumpster has reportedly been removed as of the date of this report. Staining on the ground beneath these dumpsters suggests that stormwater which is trapped in these containers eventually discharges overland towards Wilson Stream.

10. Stormwater at the Site is expected to flow overland towards Wilson Stream, or into one of several on-site catch basins which discharge directly to Wilson Stream, or directly into one of the penstocks/tail races which run beneath the main manufacturing building. Roof drains also discharged directly to Wilson Stream. No provisions for pre-treatment of stormwater runoff were observed or historically noted at the Site.

11. Based on historical environmental reports, the age of the building and Ransom's observations during our Site reconnaissance, hazardous building materials are present on-site, and include ACM, lead-based paint, potential PCB-contaminated wastes and building materials, and universal wastes (fluorescent bulbs and ballasts, mercury thermometers, etc.). It should be noted that a Hazardous Building Materials Survey was conducted concurrently with this Phase I ESA to identify the potential presence of these materials.

Based on the information obtained during this assessment, Ransom concluded that additional investigation was warranted to further evaluate the RECs identified above. Specifically, Ransom recommended the following:

1. Conduct a subsurface investigation at the Site which would include the collection of soil, groundwater, sediment, pore water, and soil vapor samples to assist in evaluating and documenting current environmental conditions and to what extent, if any, the RECs identified above have adversely impacted environmental conditions at the Site. As part of this investigation, the ash present in the area beneath the former stacks should be

sampled and characterized for disposal; the dumping area observed on the southern bank of Wilson Stream should be assessed; and potential preferred pathways associated with underground utilities (including the piping for the former water reservoir on the northern side of Depot Street, and water infrastructure along Depot Street) should be investigated.

2. Conduct a sampling program inside the main manufacturing building to evaluate whether PCB-containing building materials are present, and to determine if PCBs were present in the oil which was observed to have historically stained interior floors, ceiling, and walls.

3. The hazardous materials, drums, and containers on-site should be thoroughly inventoried and characterized. These materials should be consolidated and properly stored on-site (in a secured area with secondary containment) until which time they can be transported offsite for proper disposal. These materials must be removed from Site prior to demolition of the building.

4. All hazardous building materials which were identified in the Hazardous Building Materials Survey (i.e. ACM, lead-based paint, and universal wastes) must be abated and/or removed from Site prior to building demolition. Any Hazardous Building Materials identified in the Phase II subsurface investigation (i.e. PCB-containing building materials) must also be property abated and/or removed from Site prior to building demolition.

5. A floor drain investigation should be conducted in the main manufacturing building to determine the ultimate disposal locations of any identified floor drains, and to determine if any subsurface sumps or dry wells are present beneath the building. A thorough inventory of drains (open and closed) will be conducted, and any open drains will be dye and/or smoke tested to determine ultimate disposal locations. Because the main manufacturing building is planned for demolition, no closure of active floor drains will be necessary; however, if the building is to remain or be redeveloped, all active floor drains in the main manufacturing building should be permanently closed.

6. Prepare a Soil and Groundwater Management Plan which will be implemented during future Site excavation and/or demolition activities. This Management Plan will provide guidance on the management of impacted soils and groundwater which may be encountered during Site redevelopment activities to minimize human exposure risks. This plan will outline soil and groundwater management procedures, testing requirements, stockpile maintenance, and notification/disposal requirements, among other pertinent data.

"Hazardous Building Materials Survey, Forster Manufacturing, 81 Depot Street, Wilton, Maine," prepared by Ransom, dated June 29, 2015.

Ransom also conducted a Hazardous Building Materials Survey (HBMS) on behalf of the MEDEP, concurrent with the June 2015 Phase I ESA.

ACM were identified at the Site. Materials identified as ACM that may be impacted by future renovation or demolition of the Site building should be properly removed prior to such activities. ACM identified at

the Site included asbestos-cement piping, paneling, and flooring, areas of linoleum sheet flooring, interior and exterior window glazes, and pipe insulation, boiler lagging, gaskets, etc. associated with two large-unit boilers.
Due to access and safety limitations, asphalt-based roofing materials were identified as presumed asbestos-containing materials (PACM).

Lead-based paint (LBP) was identified at the Site building. General and/or demolition contractors may perform demolition of surfaces coated with LBP or lead-containing coatings, provided that the handling of components coated with paint containing lead at any concentration (referred to as lead-containing paint) complies with Occupational Safety and Health Administration's (OSHA's) lead standards.

Ransom inventoried additional hazardous or potentially hazardous building fixtures at the Site during the course of this investigation that may contain polychlorinated biphenyls (PCBs) and heavy metals. Disposal of each of these items is also subject to hazardous and/or universal waste disposal requirements.

"Phase II Environmental Site Assessment Summary Report, Forster Mill, 581 Depot Street, Wilton, Maine," prepared by TRC Environmental Corporation (TRC), dated December 2015.

TRC performed a Phase II ESA to evaluate the RECs identified in Ransom's Phase I ESA. Based on the results of this Phase II ESA, the following conclusions were made:

- Site Safety – The four-story unsupported exterior masonry/brick wall on-site is creating an unsafe or hazardous condition for workers and trespassers. This unsafe condition should be addressed quickly, likely through the removal of this unsupported wall.

- TRC observed relatively small quantities of presumed hazardous wastes and/or petroleum products throughout the structures but concentrated on the basement/first floors. Staining or other evidence of release was observed in some areas.

- Ash-like material was observed in the area around the smokestack.

- Floor drains, sumps, and open penstocks were observed in the basement of the building with standing water, sediment and debris located within the structures. At some locations, evidence of staining and odors were observed.

- Pipes and drains were observed on the bank of Wilson Stream. Under the Mill building, black staining was observed on rocks.

- Staining was observed on the floors throughout the site building on the floors, ceilings and walls.

- A geophysical survey was conducted to locate existing on-site utilities, screen boring locations, and trace pipes/drains. Drains were detected in the subsurface that were oriented from north to south. While the terminus of each drain was not located, it is assumed that most ultimately end in the subsurface underneath the building or at Wilson Stream. The Site is not (and to our knowledge has not been) connected to a process water system. The Site was connected to the Town sanitary sewer system in 1978.

- Soil samples were screened in the field during soil boring activities. Photoionization detector (PID) screening results from the soil collected during drilling activities ranged from non-detect to 31.1 parts per million (ppm), indicating VOC presence in a small portion of the Site soils located in close proximity to the former UST.

- Relatively low concentrations of SVOC compounds and metals in soil are generally distributed across the entire Site and found at similar concentrations to the background soil samples. Low concentration petroleum compounds, extractable petroleum hydrocarbons (EPH) carbon chain C11-C22 Aromatics, and certain PAHs and dibenzofuran were detected above MEDEP Remedial Action Guidelines (RAGs), and appear to be localized in the area around the 100,000-gal concrete UST bunker (northwest portion of the Site).

- Groundwater Analytical Results – One VOC, one SVOC, and one metal were detected in the groundwater samples at concentrations below the Residential and/or Construction Worker RAGs. No other constituents were detected. Based on the collected samples and applicable RAGs, groundwater does not appear to be impacted at the Site.

- Air-phase hydrocarbons (APH) and EPA Method TO-15 constituents were detected in soil gas samples below the Commercial Worker RAGs. There does not appear to be a correlation between the low-level detections and the specific location in the mill building. Based on the collected samples, soil gas does not appear to be impacted at the Site.

- Streambed Sediment Analytical Results – Five SVOC compounds were detected above Park User and/or Construction Worker Scenario RAGs. Generally speaking, the four sediment samples (one upstream, one downstream, and two adjacent) have similar relative concentration of EPH, SVOC, and metal constituents. It is likely that historical Site operations had some effect on sediment quality but the extent is not known and/or if impacts are from an upstream source. Several drains from the mill buildings appear to discharge into Wilson Stream however specific historical processes were not directly linked to SVOC compounds in sediment.

- Drain Sediment Analytical Results – Two EPH and two metals were detected above the Commercial Worker and/or Construction Worker Scenario RAGs. Petroleum compounds and metals identified in material removed from drains indicate hazardous materials and petroleum products were used in the mill building and that impacted material does exist in Site drains. Drains are assumed to discharge to the subsurface underneath the building or to Wilson Stream.

- Hazardous Waste Inventory – TRC conducted a hazardous waste inventory of safely accessible rooms/areas on each floor of the mill building, as well as the exterior metal shed, former sawdust shed, and photo shed. A total of fifteen types of potentially hazardous materials were identified including the following: paints, adhesives, silica gel desiccant, possible gasoline, propane, oxygen, and acetylene tanks, photo-development liquids, light ballasts, hydraulic oil, and unidentified liquids.

Based on the results of this Phase II ESA, the following recommendations were made:

1. Stabilize or remove the four-story unsupported exterior masonry/brick wall as soon as possible to mitigate the safety hazard to site workers and trespassers.

2. Secure both interior and exterior areas of the Site from potential trespassers which may vandalize and release petroleum and/or hazardous materials from the numerous containers within the buildings;

3. Apply to the MEDEP's Voluntary Response Action Program (VRAP) to gain the liability protections afforded under the program and work with the Department to undertake possible additional assessment and/or remedial actions to mitigate human health exposure and ecological risk;

4. Safely package for transport and dispose of all petroleum and/or hazardous materials containers offsite;

5. Demolish the Site buildings and remove debris from the Site for offsite disposal. During demolition, consider the following: Presence of possible hazardous building materials; Presence of drain lines containing petroleum and/or hazardous materials; Presence of petroleum and/or hazardous materials containers; and Proximity of buildings to Wilson Stream.

6. Once the Site buildings have been raised and debris removed from the Site, assess the most effective remedial action to mitigate human health exposure and ecological risk due to impacted soil (hotspot removal, clean cover capping, etc.); and

7. Place a deed restriction on the Site limiting future redevelopment to commercial and/or industrial activity (unless additional assessment work is conducted to allow for residential and park user uses).

Letter Report: "Re: Asbestos Consulting Services", prepared by TRC Environmental Corporation (TRC), dated December 2015

TRC issued this letter report to MEDEP, presenting the results of their limited inspection and sampling for asbestos at the Site, conducted in December of 2015. At the request of MEDEP, TRC collected samples of roofing materials from three distinct roofing areas of the Site building, and submitted them for laboratory analysis. Two of the three samples collected tested non-detect for asbestos, while the third (Roof-3) was identified as ACM. The results of TRC's roof testing are confirmed by sampling conducted during Ransom's supplemental roofing survey, presented herein. It is noted that TRC's roof sampling was limited in extent, and included only roof field materials, not flashings, sealants, mastics, etc.

"Supplemental Phase II Environmental Site Assessment, Forster Manufacturing Mill, 581 Depot Street, Wilton, Maine," prepared by Ransom, dated March 22, 2017.

Ransom performed this Supplemental Phase II ESA to address data gaps which were identified in historic environmental reports. This Phase II ESA included the advancement of five Geoprobe soil borings within the building footprint to assess sub-slab soils; field screening and laboratory analysis of soil samples for volatile organic compounds (VOCs), extractable petroleum hydrocarbons (EPH) fractions, polycyclic

aromatic hydrocarbons (PAHs), volatile petroleum hydrocarbons (VPH) fractions, Resource Conservation and Recovery Act (RCRA) 8 Metals, and polychlorinated biphenyls (PCBs); collecting samples of roofing materials to determine if asbestos-containing building materials were present; the consolidation of potential hazardous waste containers throughout the Site; and collection of representative product waste characterization samples for laboratory analysis of pH, Flashpoint, Metals, and PCBs. Results are as follows:

- None of the sub-slab soil samples contained contaminant concentrations which exceeded these regulatory cleanup guidelines; therefore, no further assessment or remedial actions are recommended at the Site in connection with sub-slab soils.

- Asbestos was detected in samples of roofing materials collected from the Site buildings. Specifically, one large roof area near the westerly end of the Main building, sealants identified in roof perimeter flashings, the "silver coat sealant" applied to the majority of the Main building roof, and the asphalt shingles on the Paint Shed building were each identified as ACM.

- As part of the consolidation and characterization of potential hazardous waste remaining on-Site, waste containers were collected from safely-accessible areas of the Site, transported to the metal storage building, placed on poly sheeting, inventoried, and waste characterization samples were collected. None of the waste characterization samples collected contained contaminants which exceeded the standards outlined in the Chapter 860 Waste Oil Management Rules for Specification Waste Oil or the MEDEP Chapter 850 Identification of Hazardous Wastes; therefore, these waste materials are anticipated to be profiled and characterized as non-hazardous.

Based on the information obtained during this Supplemental Phase II ESA, Ransom recommended the following with respect to Site redevelopment:

1. The results of this Supplemental Phase II ESA, as well as the Phase I and Phase II ESAs completed in 2015 through the MEDEP Brownfield Assessment Program, should be submitted to the MEDEP Voluntary Response Action Program (VRAP);

2. A Soil and Groundwater Management Plan should be prepared prior to Site redevelopment to insure proper characterization, handling, and management of impacted soils and groundwater during future Site redevelopment and/or subsurface earthwork-related activities at the Site;

3. Materials identified as ACM that may be impacted by future renovation or demolition of the Site building should be properly removed for off-Site disposal, prior to or during such activities;

4. Waste containers which have been consolidated in the metal storage building should be properly managed for off-Site transportation and disposal; and

5. As a likely condition of the MEDEP VRAP and assuming U.S. EPA Brownfields Cleanup funding will be utilized for cleanup of the Site, an ABCA/RAP should be prepared for review and approval by the MEDEP and U.S. EPA, prior to future Site cleanup, remedial actions, and redevelopment activities.

MEDEP Task Order, March 2017

In March of 2017, Ransom and the MEDEP oversaw the removal and off-site disposal of hazardous waste containers which were consolidated in the metal storage building onsite. As part of this task order, universal waste was also removed from the Site Building.

As part of this task order, Ransom and the MEDEP also oversaw the abatement and removal of ACM in the onsite boiler room.

4.0 COMMUNITY BACKGROUND

The Town of Wilton is a rural Maine community of approximately 4,000 persons located in Franklin County, Maine. Wilton is crossed by U.S. Route 2 and state routes 4, 17, 133 and 156. It borders the towns of Farmington to the east, Carthage to the west, Temple to the north, and Jay to the south.

The Forster Mill site consists of vacant land and the dilapidated building. The current condition of the site severely limits the use of the Site by local residents, outdoor recreation enthusiasts, and commercial interests. Redevelopment of the Site will allow for greater access from the community at large, and will facilitate opportunities for commercial or industrial enterprises.

4.1 Community Involvement

4.1.1 Initial Public Meeting and 30-Day Public Comment Period

The first public meeting was held on July 18, 2017. The purpose of the public meeting was to discuss the general Brownfields process, the results of site assessment work completed to date, the results of the ABCA, the proposed cleanup action under the MEDEP Voluntary Response Action Program (VRAP), and the potential benefits of Brownfield site redevelopment, and to solicit input from the public on their concerns and desires for the Site.

The public meeting announcement and availability of the Site documents for review were advertised in the local newspaper (Sun Journal) on July 11, 2017. The legal advertisement, as well as this Community Relations Plan, announced the start of a 30-day comment period on the remedial alternatives presented in the ABCA for the Site. The public comment period ended on August 17, 2017.

4.1.2 Stakeholder Meetings

The Town conducted an on-site project kickoff meeting with representatives from Wilton, EPA, MEDEP, and Ransom on October 6, 2016. Similar meetings, as well as information redevelopment visioning sessions with local project stakeholders, regarding the proposed redevelopment and reuse scenarios for the Site will likely be held in the fall/winter of 2017 and will be advertised in the local press as described in Section 5.0, below.

4.1.3 Periodic Project Status Meetings

The Town has proposed holding two public project status meetings for this Brownfield site. The first public meeting will be held following selection of the prime construction contractor prior to initiating the cleanup actions. The purpose of this meeting will be to discuss the final design, proposed cleanup actions, and sequencing of work. A second public meeting will be held at the completion of the construction. The project completion meeting will recap the remediation efforts, highlight the redevelopment potential for the Site, and allow a forum for public discussion of future development ideas for the property. The meeting dates and times will be advertised in the local press as described in Section 5.0, below.

4.2 Key Community Concerns

To date, the public has voiced encouragement and support for the proposed remediation and redevelopment plans. However, concerns expressed include:

The Town and public wish to see complete demolition of the site buildings;

Concerns associated with hazardous building materials impacting the health of adjacent property owners during demolition; and

Minimizing impacts to Wilson Stream and providing protection of natural resources and open greenspace at the Site, as best as possible, during the proposed cleanup actions.

5.0 CONTINUED COMMUNITY INVOLVEMENT

The Town will utilize its existing partnership with the U.S. EPA, the MEDEP, and its selected environmental consultant, Ransom Consulting, Inc., to provide continued community involvement for the project. The U.S. EPA and MEDEP have provided regulatory oversight of the Brownfields assessment process and will oversee cleanup through the MEDEP VRAP.

The Town has partnerships with the Franklin County Chamber of Commerce, the Wilton Downtown Committee, the Wilton Group, the Wilton Development Corporation and the Greater Franklin Development Corporation. These COs will provide increased marketing and promotion potential; and will assist in outreach efforts through postings on their websites/social media sites, and via distribution lists.

Public notices will be placed in local newspapers announcing the intended remediation activities at the Site and to notify residents of the public meetings regarding the remediation efforts. In conformance with the U.S. EPA Brownfields Cleanup Grant requirements, the public notice will also announce that the information repository on this project, including the environmental assessments and other project information, is located at the Town's offices and is available for viewing during Town Office business hours.

In addition, meeting announcements will be placed in the local newspaper notifying residents of the public meetings to be held at the Town Office. The information repository will be updated with the inclusion of meeting minutes, status reports, and other communications. Ransom and the Town will establish an email list that includes project stakeholders and interested parties. This list can be expanded upon and also utilized to keep interested parties current on the project status.

Public comments regarding the project can be submitted at the public meetings, by email to Town Manager Rhonda Irish, (manager@wiltonmaine.org), or in writing to the following address:

Rhonda Irish, Town Manager
Town of Wilton
158 Weld Road
Wilton, ME 04294

6.0 SCHEDULE

The following schedule presents the tentative or proposed timeline related to the public outreach and involvement for the proposed cleanup at the Site:

- July 2017 – The Town announces notice of availability of the ABCA and other environmental reports/project documents for public review to be maintained within the information repository for the Site. A legal/public notice announcing the availability of plans/environmental documents for the Site and the scheduled public meeting was published in the local paper (Sun Journal) on July 11, 2017, thus marking the beginning of a 30-day public comment period on the proposed cleanup plans.

- August 17, 2017 – The 30-day public comment period ended. The Town did not receive any public comments that altered the proposed cleanup plan.

- October 2017 - The proposed cleanup plans will be reviewed by the U.S. EPA and the MEDEP and finalized.

- October 2017 – The Town and Ransom submit the Community Relations Plan to the MEDEP and U.S. EPA for review and approval.

- October/November 2017 – Completion of final permitting, work plans, construction design, and bid specification package, and solicitation of competitive cleanup construction bids.

- November/December 2017 – The Town selects a cleanup contractor(s).

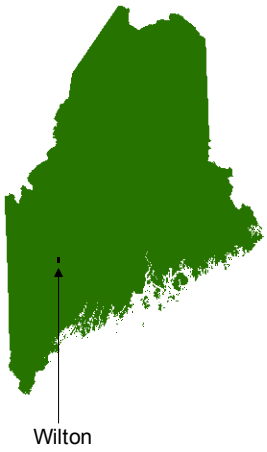
- Winter 2017– Cleanup construction project begins with periodic public project status meetings, as previously noted under Sections 4.0 and 5.0 above (start date is weather dependent).

- 2018 – Project completion.

Please note that periodic public notices will be published in local newspapers regarding the overall project status and/or changes to the proposed project schedule, as necessary.

RANSOM
Consulting Engineers and Scientists

Regional Locator Map



Notes

1. Data Source: USGS National Map Seamless Server, 24K DRG, 1/3" NED
2. USGS Quad Name: Wilton
3. Latitude: 44° 35' 24" N
   Longitude: 70° 13' 18" W
   UTM Northing: 4938119 mN
   UTM Easting: 403038 mE

Scale and Orientation

0 1,000 2,000

1 inch = 2,000 feet

Prepared For

Town of Wilton
158 Weld Road
Wilton, Maine

Site Address

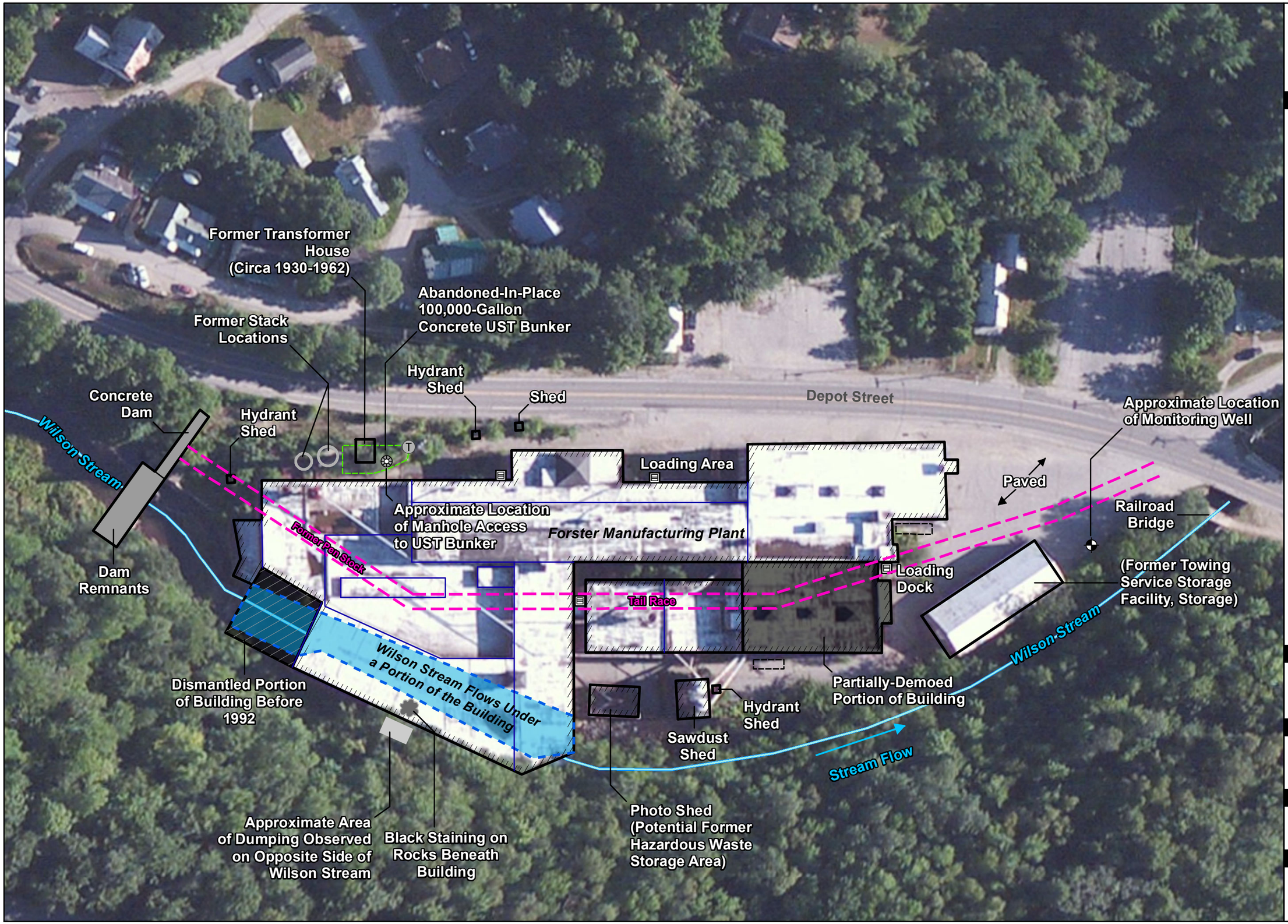
Forster Manufacturing Co.
581 Depot Street
Wilton, Maine

161.06104 | July 2017

Figure 1

Site Location

G:\Data\ME\Project\161_06104\Maps\Figure_1.mxd



RANSOM
Consulting Engineers and Scientists

Legend & Notes

- Site Boundary
- Dumpster
- (T) Former Transformer Location

Notes

1. Site Plan based on National Agricultrual Imagery Program Orthoimagery
2. Some features are approximate in location and scale
3. This plan has been prepared for the Town of Wilton. All other uses are not authorized unless written permission is obtained from Ransom Consulting, Inc.

Scale & Orientation

0 35 70

1 inch = 70 feet

Prepared For

Town of Wilton
15 Weld Road
Wilton, Maine

Site Address

Forster Manufacturing
581 Depot Street
Wilton, Maine

161.06104 | July 2017

Figure 2
Site Plan

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