



Narrative Information Sheet
U.S. EPA Brownfield Site-Specific Assessment Grant Application
Former Great Northern Paper Company, Millinocket, Maine
Our Katahdin

1. Applicant Identification: Our Katahdin
245 Aroostook Avenue
Millinocket, Maine 04462

2. Funding Requested
 - a. Grant Type: Site-Specific Assessment
 - b. Federal Funds Requested
 - i. Amount Requested: \$350,000
 - ii. Site-Specific Assessment Grant Waiver: Yes - Request Attached
 - c. Contamination: Hazardous Substances

3. Location
 - a. City: Millinocket
 - b. County: Penobscot County
 - c. State: Maine

4. Property Information for Site-Specific Applications: 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 Site-Specific Assessment will be completed in the Town of Millinocket, which has a population of 4,346 (2017 American Community Survey, Census.gov).

400 Commercial Street, Suite 404, Portland, Maine 04101, Tel (207) 772-2891, Fax (207) 772-3248

Pease International Tradeport, 112 Corporate Drive, Portsmouth, New Hampshire 03801, Tel (603) 436-1490

12 Kent Way, Suite 100, Byfield, Massachusetts 01922, Tel (978) 465-1822

2127 Hamilton Avenue, Hamilton, New Jersey 08619, Tel (609) 584-0090

60 Valley Street, Building F, Suite 106, Providence, Rhode Island 02909, Tel (401) 433-2160

www.ransomenv.com

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority brownfield site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	3
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	NA

8. Letter from State or Tribal Environmental Authority: Attached



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



JANET T. MILLS
GOVERNOR

GERALD D. REID
COMMISSIONER

November 22, 2019

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 a site-specific assessment and is applying for federal Brownfields grant funds.

Sean DeWitt of Our Katahdin has developed an application requesting federal site-specific Brownfields Assessment Grant funding for assessing the former Great Northern Paper property, located at 1 Katahdin Avenue in the Town of Millinocket.

If Our Katahdin receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, Quality Assurance Plans, and Health and Safety Plans. If cleanup is pursued, the Department's Voluntary Response Action Program ("VRAP") staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight (as necessary) of 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

a. Target Area and Brownfields

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 4,346¹ 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 is the Priority Brownfield Site and the subject of this Site-Specific Assessment grant application. The GNP Site, along with the adjacent residential areas and the Millinocket downtown is the Target Area of this Site-Specific Assessment 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 in the neighborhoods abutting 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, the mill employed more than 2,000 people. Global competition and lack of investment led to mill down-sizing and layoffs in the 1990's, which was followed by the devastating closure of the 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 has 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 2017, it was estimated that 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 has left behind our sensitive population of low income, unemployed, disabled, and aging population that is struggling to adapt and reinvent themselves in a dwindling economy. Unemployment in the Katahdin Region remains high at 6.5%² and the median household income in Millinocket (\$32,333) is only 60% of the median household income in the State of Maine (\$53,024)².

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 assessment and cleanup.

ii. Description of the Priority Brownfield Site(s)

The former 1,400-acre GNP site is the Priority Brownfield Site and subject of this this Site-Specific Assessment Grant application. The Site operated as a pulp and paper mill from circa 1901 to 2008. The GNP Site consists of a campus of dilapidated mill buildings, abandoned infrastructure, and concrete building remnants that occupy over 200 acres along Millinocket Stream. This mill was the heart of Millinocket for over 100 years, providing good-paying jobs, financial security and a sense of community pride. However, in the years since its closure, the mill serves only to remind residents of a time when jobs were plentiful, the downtown was busy and occupied, and Millinocket was successful and thriving. Now, the mill's dilapidated, gutted buildings and environmental contamination are a blight and anchor to Target Area revitalization.

A recent Phase I Environmental Site Assessment completed at the GNP site identified a significant number of recognized environmental conditions and areas of concern which require further assessment. These included: historic industrial operations; hazardous material handling and storage; documented petroleum and hazardous (comingled) material releases; historic filling with coal ash; a 350-gallon PCB oil release at the Riverbank Substation Transformer with insufficient cleanup actions; historic releases associated with the Bulk No. 6 Fuel Oil Tank Farm; a wastewater treatment plant, associated storage of hazardous materials (ammonia, phosphoric acid, caustics), and presence of residual sludge/solids remain in lagoons (observations suggest the liner is damaged); the 1.4-acre former Brown Relic Dump and waste oil storage area with documented regulatory

1 2017 American Community Survey. Census.gov

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

violations; an on-site Electrical Substation with significant oil staining observed; boiler ash stockpiles which have not been assessed; the 600,000-gallon unlined Ash Pond; the former Core Storage Facility which was used for storage of waste oil and chemicals; and various hazardous waste storage sheds. Hazardous building materials, including asbestos, lead-based paint, universal wastes (i.e., PCB-containing fluorescent light ballasts, mercury-containing fluorescent lamps, etc.) and mold growth have also been identified (or are suspected to be present) in various on-Site buildings. **The enormity in scale associated with the contamination and environmental issues at the GNP Site is overwhelming; to date, these issues have not been sufficiently quantified, characterized or evaluated.** To assess the RECs identified and to determine the extent which the sensitive populations living and working in the Target Area are exposed to on-Site contamination, extensive and thorough subsurface investigations and Hazardous Building Materials Inventories (HBMI) must be conducted.

b. Revitalization of the Target Area

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 the GNP site. OK has acquired and is redeveloping the entire GNP site into the One Katahdin Fiber Park. OK has developed a “Business and Development Plan” which outlines strategies comparable to those used on Defense Base Closure and Realignment Act (BRAC) Sites, which go through closure and are often turned into industrial park campuses. OK’s goal for this “Fiber Park” is to provide utility resources to the world’s next generation of wood product, information technology, and manufacturing businesses at industrial scale and competitive market rates; the end result will be a self-sustaining industrial campus with 10-15 new business and 300-500 new employment opportunities.

The GNP Site is on the banks of Ferguson Lake/Millinocket Stream, and portions of the Site are located within the flood zone³. As such, 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 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 GNP Site; they have assisted OK in resource development and tenant support. **The OK redevelopment plan for the GNP Site is directly in-line with the goals of the Town’s (and Katahdin Region’s) overall comprehensive plans.**

ii. Outcomes and Benefits of Reuse Strategy

Performing environmental assessment at GNP site will be an important step in a multi-phased process to assess, reuse and redevelop the overall Target Area. Assessment, cleanup and revitalization of the mill site 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. Mill revitalization will allow for the reuse of existing sewer, water, and electric infrastructure as well as

³ Penobscot County, Maine National Flood Insurance Panel Number 2301110005B

reusing mill buildings that are predominately intact and can be remediated and readapted in a cost-effective manner.

The Town of Millinocket was designated as an “Opportunity Zone;” as such, these revitalization plans will spur economic development in one of the State’s poorest regions. These project outcomes directly correlate with our reuse strategy for the site.

We anticipate property values within the immediate neighborhood will rise due to the enhanced use of the Site which will eliminate environmental stigma and safety concerns. The GNP mill reuse project will utilize green hydroelectric power *generated at the GNP site* and solar arrays will be installed on roofs. The revitalization of the GNP Site will promote prosperity and further industrial, commercial and residential revitalization in the Target Area Opportunity Zone.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

OK has been applying and will continue to apply for grants and foundation funding to assist development efforts at the GNP Site. In September 2018, OK received a \$5.3M federal grant from the U.S. Economic Development Agency (EDA) to remediate and build critical infrastructure at the GNP Site. Additionally, OK has *already received* a \$450,000 loan from the Town of 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 engineering and planning; \$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. This money has been earmarked for infrastructure, utility, and telecommunication improvements which are necessary to attract and secure tenants.

All of the leveraged funding described above will support the renovation/redevelopment of the GNP Site; however, none of these improvements can be conducted if environmental concerns associated with the site and on-Site buildings are not characterized and assessed. Until environmental assessment and eventual cleanup occurs, no redevelopment or renovation of the GNP Site can be conducted.

Once assessments/cleanups have been completed 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 assessment or 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.

ii. Use of Existing Infrastructure

The GNP site and Target Area maintain significant infrastructure which can be reused and revitalized as a cost savings to the overall GNP 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 on-Site tenants. **Wastewater:** The Target Area currently has a wastewater treatment plant which will allow OK to provide competitively priced wastewater treatment to on-Site tenants. **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 the deep-water ports of Searsport and through an interconnect to the metropolitan centers of the Northeast. **Golden Road Fiber Supply:** The Target Area is 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. **Regional Workforce Efforts:** The GNP site 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 Site-Specific Assessment of the GNP site.*

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Due to the small population of the Target Area (4,346³) and the existence of economically-impooverished sensitive populations, OK (as a non-profit) cannot provide direct funding for this large-scale assessment 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% (the Maine unemployment rate is 5.3% and the USA is 3.6%⁴). This has caused outmigration due to lack of jobs and opportunities; the former Millinocket 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 housing stock have become 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 over the last 4 years as the number of students has declined from 655 in 2007 to 500 and continues to drop.^{5,6} *According to the 2017 American Community Survey, no new homes have been constructed in Millinocket since 2010.*

The median household income in Millinocket is \$32,333, approximately 60% of the Maine median household income of \$53,024³. 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 site⁷. These economic hardships have made it impossible for the Town to fund environmental and assessment projects, or to address the blight and vacant downtown buildings using municipal funds.

Because the Town is unable to fund environmental assessments and cleanup activities, responsibility falls on individuals, business owners, and non-profit groups. OK has taken on the monumental task of redeveloping the 1,400-acre GNP Site; this work will only be possible through federal grants and assistance from governmental and non-governmental agencies. This Brownfield grant is crucial to the assessment and reuse of the GNP Site and the revitalization of the Target area. This Brownfield Assessment Grant would truly be the impetus for area reinvestment and development, job creation, and an increase in the Town's tax base.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Low income, unemployed, disabled adults and the elderly are our sensitive populations which are disproportionately impacted by environmental concerns present at the GNP site, including hazardous building materials (asbestos, lead paint, PCB, and mold concerns) which are present in homes and buildings in the Target Area. 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 population⁸. 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 general population is affected by a disability*

⁴ 2017 American Community Survey. Census.gov.

⁵ <https://www.pressherald.com/2014/08/17/how-much-further-can-millinocket-fall/>

⁶ <https://www.publicschoolreview.com/maine/millinocket-public-schools/2308280-school-district>

⁷ <https://bangordailynews.com/2015/09/03/news/penobscot/millinocket-property-tax-rate-rises-as-valuation-plummets/>

⁸ 2017 American Community Survey. Census.gov.

(compared to 15.9% in Maine); and 41.3% of the elderly population over 65 is affected by a disability⁷. These environmental issues, combined with the overall disinvestment and blight that plagues the Target Area, have impacted the health of low-income families, the disabled, and 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 contaminants to their healthcare concerns is overly burdensome to one of the Town's most sensitive populations.

This assessment project is an important step in the reuse and redevelopment of the GNP site and the revitalization of the Target Area. Environmental investigations are the first step in a redevelopment process that will create community pride, investment, and good-paying jobs (both at the Site, and through development of support businesses). Reinvestment in the community will lead to improvements to infrastructure, the housing stock, downtown area, health care and services, 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 many of the buildings on the GNP campus, and many of the abandoned and dilapidated buildings in the Target Area. Asbestos is known to contribute to *respiratory ailments, such as asthma, lung cancer and asbestosis*. This along with other hazardous materials (solvents, metals) and petroleum impacts at Brownfield sites highlight the burden our residents have and the importance of assessing and eventually cleaning up these sites. Maine is situated in the nation's "tail-pipe," where the Jet Stream deposits smog, smoke, and ozone; this in combination with environmental contamination in our Target Area is in part why Maine has the highest asthma rate in New England. 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 manufacturing⁹. These greenhouse gasses not only contribute to air pollution, they also have the potential to adversely impact human health. According to the Maine CDC, 12.8% of adults in this region suffer from asthma compared to 8.9% nationwide. 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 America. In the United States, 41% of occupied housing was constructed prior to 1970 (when lead-based paint was still widely used); however, in Millinocket, that number skyrockets to 73%⁷. *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-contaminated particulates and poor indoor air quality, which may be contributing to asthma and cancer rates.*

Maine ranks higher than the national average in overall cancer rates, chronic respiratory diseases and unintentional injuries. Industrial sites, like the GNP site, typically have soil and groundwater contamination characterized by PAH compounds and heavy metals; studies show that individuals exposed to these contaminants over long periods can develop cancer and other health impacts. Assessment, cleanup and removal of contaminants like the ones present on-Site will reduce the hazards and mitigate health impacts to the identified sensitive populations in the Target Area.

(3) Disproportionately Impacted Populations

Brownfields have created environmental justice challenges which have resulted from past industrial, governmental, commercial operating policies which caused a cycle of disinvestment and poverty. The median household income in Millinocket is \$32,333, approximately 60% of the Maine median

⁹ U.S. EPA National Emissions Inventory. EPA.gov

U.S. EPA Brownfield Site-Specific Assessment Grant Application – **Narrative**

Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

household income (\$53,024), and 10.1% of the population lives in poverty¹⁰. The historic mills that once provided jobs, security, and financial contributions, are now contaminated relics which are a drain on the Town’s economy. Historically, GNP prevented other industries from locating in Millinocket because they didn’t want to compete for the labor pool¹¹. 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.

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.

b. Community Engagement

2.b.i Project Partners & 2.b.ii Project Partner Roles

OK and Millinocket have formed a private-public partnership and created an Economic Redevelopment Committee to support the GNP redevelopment. 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, as noted below:

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 BAC.
The Nature Conservancy	Bill Patterson, wpatterson@tnc.org 207-607-4819	TNC will provide grants, help convene community-based organizations, and 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. FOR/Maine will provide contacts, connections to resources, and context for market-based strategies for former paper mill site 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 targeted community and stakeholders in the planning and implementation of this project, as well as soliciting input, and responding to questions and concerns in a meaningful way. The local community, project partners, and residents will be encouraged to provide feedback through social media outlets, via the 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, solicit feedback, and support the assessment and subsequent cleanup and redevelopment of the GNP site.

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

¹⁰ 2017 American Community Survey, Census.gov

¹¹ <https://www.pressherald.com/2014/08/17/how-much-further-can-millinocket-fall/>

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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 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 assistive technologies such as teletypewriter relay (TTY) services as needed.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

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

Task/Activity 1: Cooperative Agreement Oversight
<p>i. Project Implementation:</p> <ul style="list-style-type: none"> EPA-Funded Activities: OK will perform program development, organization, and support; will conduct programmatic oversight, and will develop a Brownfields Advisory Committee (BAC) that will include 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/updated. OK will establish a schedule and facilitate meetings with the BAC, MEDEP, and EPA. Non-EPA grant resources needed to carry out task: None
<p>ii. Anticipated Project Schedule: We anticipate the BAC will be developed within 1 month of funding, and that 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 on a quarterly basis as needed. ACRES will be updated throughout the grant period.</p>
<p>iii. Task/Activity Lead: OK will oversee this task, with assistance from the BAC and selected QEP.</p>
<p>iv. Outputs: A BAC will be developed; a QEP will be selected; OK and the QEP will facilitate/attend up to three meetings with the BAC; 12 quarterly reports will be prepared; MBE/WBE reporting will be conducted as needed; ACRES will be updated throughout the grant period.</p>
Task/Activity 2: Community Engagement
<p>i. Implementation:</p> <ul style="list-style-type: none"> Discussion of EPA-funded activities: OK and the QEP will develop marketing materials; will notify residents, adjacent land owners, target community members, and community partners of site-specific public information meetings and assessment schedules; hold public meetings to inform, educate, and update the target community regarding assessment and redevelopment activities; provide updates as necessary at Town and local development council meetings; and prepare public outreach materials. OK will advertise for public meeting through online and in-person methods and will hold three public meetings to solicit input, educate, and update the community. Outreach material will be available on-line (OK and Town websites) and in hard copy at select locations throughout Millinocket. Non-EPA grant resources needed to carry out task/activity: Community partners will be used to help advertise public meetings and solicit input from the community. Meetings may be held at the Millinocket Town Hall.
<p>ii. Anticipated Project Schedule: Community outreach will be performed for the duration of the grant period; we anticipate the first public meeting (Brownfields 101) will be held within three months of QEP selection; the second public meeting will be held after the first round of assessments have been completed; and the third public meeting will be held when assessments are nearing completion and reuse planning begins.</p>
<p>iii. Task/Activity Lead: OK will oversee this task, with assistance from the BAC, the QEP and community partners.</p>
<p>iv. Outputs: Outreach and educational materials (Brownfield 101 tri-fold brochure and FAQ handout), public meeting advertisements, press releases and project update reports, educational materials to support public meetings (PowerPoint presentations and handouts). Three public meetings. One-on-one meetings with Site abutters, as needed.</p>
Task/Activity 3: Phase II Environmental Site Assessments (ESAs)

<p>i. Implementation:</p> <ul style="list-style-type: none"> EPA-Funded Activities: An ASTM-compliant Phase I ESA and Hazardous Building Materials Inventories (HBMIs) for certain on-Site buildings have already been completed and approved by the MEDEP. Using these reports, the QEP will conduct Phase II ESAs to evaluate RECs in accordance with ASTM E1903-11. Prior to the Phase II ESA, the QEP will develop a MEDEP and EPA-approved Quality Assurance Plan (QAPP) and Site-Specific QAPP (SSQAPP). Investigative activities will vary based on which Area of Concern (AOC) is being assessed; however, these activities will likely consist of soil, groundwater, soil vapor, and sediment sampling, and conducting HBMIs as outlined in the SSQAPP. At the completion of Phase II ESA activities, the QEP will prepare a summary report for review and approval by OK, the MEDEP, and the EPA. Because OK owns the Site, no site access agreements will be necessary; access agreements will be obtained from adjacent landowners, as necessary. Non-EPA grant resources needed to carry out task/activity: None
<p>ii. Anticipated Project Schedule: The QEP will begin working on a QAPP/SSQAPP within 1 month of selection. Once approved by the MEDEP/EPA, we anticipate site-specific assessment activities will begin within 1 month. Assessment and reporting will occur throughout the grant period; we see no impediment to completing this work in the 3-year grant period.</p>
<p>iii. Task/Activity Lead: The QEP will oversee this task, with assistance from OK and the BAC</p>
<p>iv. Outputs: MEDEP and EPA-approved QAPP and SSQAPP, Phase II ESA Report</p>
<p>Task/Activity 4: Cleanup Planning/ Reuse Planning</p>
<p>i. Implementation:</p> <ul style="list-style-type: none"> EPA-Funded Activities: The QEP will develop Analyses of Brownfields Cleanup Alternatives (ABCA)/Remedial Action Plans (RAP) for AOCs which require remediation based on Phase II ESA data. The ABCA/RAPs will include remedial actions for each identified regulated contaminant that exceeds applicable MEDEP guidelines. Remedial actions will be compared based metrics such as cost, feasibility, and effectiveness in protecting human health and the environment. Based on the results, a remediation plan will be developed for the AOC, considering the specific or potential reuse scenario(s) for the site (or selected area of the Site). Concurrently, OK, the BAC, and the QEP will complete reuse planning activities on the entire GNP Site. A public meeting will be held during this reuse planning period to solicit input from the public and community partners; we envision this meeting as a design charettes to encourage public participation. Non-EPA grant resources needed to carry out task/activity: None
<p>ii. Anticipated Project Schedule: ABCA/RAPs will be completed within 3-6 months of finalizing the Phase II ESA report. The public meeting/design charette will be held after the draft ABCA/RAPs are complete, but before they are finalized. We anticipate no impediment to completing this task within the grant period.</p>
<p>iii. Task/Activity Lead: The QEP will oversee the completion of ABCA/RAPs. OK will oversee the public meeting/design charettes with assistance from the QEP and BAC.</p>
<p>iv. Outputs: Outputs include up to four (4) ABCA/RAP reports; one public meeting/design charette (and associated outreach/presentation materials); and one EPA-approved Brownfields Planning Assessment/Study.</p>

b. Cost Estimates

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 BAC (30 hours @ \$50/hour = \$1,500); preparing bidding documents for QEP selection and interviewing/contracting with the QEP (15 hours @ \$50/hour = \$750); and for travel to the National Brownfields Conference (two people @ \$1,000 air/bus fare, lodging, and registration). QEP time associated with this task is estimated at \$3,350, which includes attendance at three BAC meetings (\$500 per meeting), and programmatic support (\$1,850).

Task 2 – Community Engagement: Costs under this task include OK staff (100 hours at \$50/hour = \$5,000) and QEP personnel time (estimated at \$4,500) to attend meetings, prepare presentations and materials, and respond to follow-up questions and comments solicited from the community. Outputs include up to three public meetings and preparation of public outreach deliverables to communicate site status and outcomes.

Task 3 – Phase I & II Environmental Site Assessments: Cost includes OK’s time for review of reports and interfacing with MEDEP, EPA and BAC personnel (100 hours at \$50/hour = \$5,000) and QEP time to complete a QAPP (\$12,000), SSQAPP and conceptual site model (\$31,500) and a Phase II ESAs/HBMIs (\$245,200, inclusive of drilling/laboratory subcontractors).

Task 4 – Cleanup/Reuse Planning: Costs include OK’s time for review of ABCA/RAPs, interfacing with MEDEP, EPA and BAC personnel, and attending/participating in a public meeting/design charette (100 hours at \$50/hour = \$5,000); and QEP time to complete four ABCA/RAPs (\$6,000 per report) and to facilitate/attend public meeting/design charette (\$8,200).

Budget Categories		Project Tasks (\$)				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Phase I & II Assessments	Task 4 Cleanup/ Reuse Planning	
Direct Costs	Personnel	\$4,250	\$5,000	\$5,000	\$5,000	\$19,250
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$2,000	\$0	\$0	\$0	\$2,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$3,350	\$4,500	\$288,700	\$32,200	\$328,750
	Other (specify)	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$9,600	\$9,500	\$293,700	\$37,200	\$350,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Budget		\$9,600	\$9,500	\$293,700	\$37,200	\$350,000

c. Measuring Environmental Results

OK will track and evaluate progress through high quality and detailed quarterly reports which outline the project’s progress in achieving outputs and results; and through frequent updating of the ACRES database with tasks completed, money spent, and project progress. OK will be in regular communication with the QEP, MEDEP and EPA through BAC Meetings, construction meetings, and weekly telephone calls with the QEP 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

a. Programmatic Capability

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, will act as Project Director and will have direct oversight of the management of this program. Prior to OK, Mr. Sanders had been a self-employed entrepreneur since he obtained a Bachelor of Science in Physics from Boston College in 1993. He started his own construction company in 1995. He grew his expertise from providing residential construction services to total project management for both residential and commercial projects, including design, permitting, cost estimating, budgeting and construction management.

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 participate in the BAC to implement the Brownfields program. She will be in frequent contact with the public and Target Area neighbors and will be

U.S. EPA Brownfield Site-Specific Assessment Grant Application – **Narrative**
Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

instrumental in the public outreach and education portions of the process. Ms. Van Hook was also involved in facilitating OK's existing Brownfield Cleanup grant for 230 Penobscot Ave.

In addition to Mr. Sanders and Ms. Van Hook, 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 has managed, overseen, and administrated over \$6 million in federal and non-federal loans as part of the GNP redevelopment. He is currently managing OK's existing U.S. EPA Brownfield Cleanup grant for the 230 Penobscot Ave. property in downtown Millinocket.

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 assessment activities and to assist with community outreach and regulatory compliance. OK and its selected QEP will liaison with the MEDEP to design, coordinate, and oversee the successful completion of the proposed assessment program. When necessary, OK will also seek the advice and support of the EPA Region 1 and MEDEP Brownfields Coordinators for direction on programmatic requirements. OK routinely creates requests for proposals and qualifications and conducts competitive procurements to obtain appropriate resources for proposed projects throughout the Target Area.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

OK received and has managed a \$200,000 FY2017 U.S. EPA Brownfield Cleanup grant for the 10,000+ square foot building located at 230 Penobscot Avenue in downtown Millinocket to abate hazardous building materials and asbestos-containing materials. The work associated with this Brownfield project was substantially completed in the fall of 2019 and work was completed on-time and on-budget. Cleanup activities included the abatement of asbestos containing materials, mold, lead-based paint, and PCB-containing materials and other regulated wastes. The successful abatement of building materials in this prominent downtown building has already resulted in redevelopment interest and a proposed reuse plan to subdivide the building into co-working space, and a community co-op space. The cleanup grant also leveraged \$110,000 in private investment, and in 2017, OK was able to replace the buildings' roof, improving the marketability and reuse potential of the building. This cleanup project is in the process of being submitted to the MEDEP Voluntary Response Action Program (VRAP) to achieve a Certificate of Closure.

(2) Compliance with Grant Requirements

Throughout this Brownfield Clean grant period, OK has submitted quarterly reports and ACRES updates on time and in accordance with all submittal requirements. Likewise, all annual financial statements have been properly submitted. No submittal or tracking issues have been identified for this Brownfields cooperative agreement. This Brownfield program is being completed in accordance with our approved work plan, schedule and terms and conditions with no corrective actions issued. On this project, OK exceeded our expected program outcomes. The grant period for this cleanup is October 1, 2017 to September 30, 2020. To date, the remaining balance on this grant is \$7,845; we see no impediment to expending these funds through grant closure reporting and documentation prior to the grant deadline.

ATTACHMENT A

Threshold Criteria for Cleanup Grants

Our Katahdin

**Former Great Northern Paper Company, Millinocket, Maine
U.S. EPA Brownfield Site-Specific Assessment Proposal**

Attachment A: Threshold Criteria

U.S. EPA Brownfield Site-Specific Assessment Grant Application
Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

III.B. Threshold Criteria for Assessment 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 Assessment funding from the U.S. Environmental Protection Agency (EPA). Documentation of tax-exempt status is included as *Attachment B* to the Narrative.

2. Community Involvement

Our Katahdin will hold up to three public meetings during the course of the grant period. We will advertise these meetings through advertisements in the Lincoln News, a local newspaper with a Katahdin section and good local readership. We will also advertise on the Our Katahdin website, the Town of Millinocket website, and with door-to-door fliers as necessary.

We will communicate the progress of our Brownfield assessment program to citizens through regular status updates which 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. Our Katahdin also intends to solicit local news coverage of public meetings and Brownfield events, such as public outreach and education meetings, Site walks, and redevelopment/reuse planning charettes.

The overwhelming majority of our community speaks English, but we will provide interpreters and/or language translations and accommodate any special needs (such as those that may have hearing/reading impairments), as needed.

3. Expenditure of Assessment Grant Funds

Our Katahdin affirms that it does not have an active U.S. EPA Brownfields Assessment Grant.

III. C. Additional Threshold Criteria for Site-Specific Applications Only

1. Basic Site Information

- a) Site Name: 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

2. Status and History of Contamination at the Site

- a) Type of Contamination: Hazardous Substances
- b) Operational History and Current Use(s) of the Site: The former Great Northern Paper Company Site encompasses approximately 1,400 acres of land situated on the east and west sides of Millinocket Stream. The Site was originally developed as Great Northern Paper Company's (GNP's) pulp and paper mill complex, which operated at the property from circa 1900 to 2008. The Site has been vacant/unused since 2008.

Attachment A: Threshold Criteria

U.S. EPA Brownfield Site-Specific Assessment Grant Application

Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

- c) Environmental Concerns: In November of 2019, Ransom Consulting, Inc. (Ransom) completed a Phase I Environmental Site Assessment (ESA) at the Site on behalf of Our Katahdin as part of a MEDEP Brownfield Assessment Grant. This ESA identified Recognized Environmental Conditions (RECs) at the Site which require further assessment. These included: historic industrial operations; hazardous material handling and storage; documented petroleum and hazardous (comingled) material releases; historic filling with coal ash; a 350-gallon PCB oil release at the Riverbank Substation Transformer with insufficient cleanup actions; historic releases associated with the Bulk No. 6 Fuel Oil Tank Farm; a wastewater treatment plant, associated storage of hazardous materials (ammonia, phosphoric acid, caustics), and presence of residual sludge/solids remain in lagoons (observations suggest the liner is damaged); the 1.4-acre former Brown Relic Dump and waste oil storage area with documented regulatory violations; an on-site Electrical Substation with significant oil staining observed; boiler ash stockpiles which have not been assessed; the 600,000-gallon unlined Ash Pond; the former Core Storage Facility which was used for storage of waste oil and chemicals; and various hazardous waste storage sheds. Hazardous building materials, including asbestos, lead-based paint, universal wastes (i.e., PCB-containing fluorescent light ballasts, mercury-containing fluorescent lamps, etc.) and mold growth have also been identified (or are suspected to be present) in various on-Site buildings.

Hazardous Building Materials Inventories (HBMIs) were also completed by Nobis Group of Concord, New Hampshire as part of a Targeted Brownfields Assessment (TBA) on behalf of U.S. EPA on the Administration Building and the Engineering and Research Building. These reports identified the presence of asbestos containing building materials (ACM), polychlorinated biphenyl (PCB)-containing building materials and fixtures; lead-based paint (LBP); mercury-containing equipment (thermostats, switches, etc.) and other universal wastes; and potentially hazardous levels of mold.

- d) How the Site Became Contaminated / Nature and Extent of Contamination: The Site's 100 year industrial history has adversely impacted soil, groundwater, soil vapor and sediments at the Site. The storage and use of hazardous materials and petroleum products was historically permitted and widely used in the paper industry. In regard to hazardous building materials, 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 Nobis HBMI and Ransom's Phase I ESA have documented numerous RECs, and the documented presence of hazardous substances and petroleum products in all developed areas of the Site. However, the nature and extent of contamination on-Site will be determined through subsequent Phase II investigations which will be funded through this Site-Specific Brownfield Assessment Grant.

3. Brownfields Site Definition

The Site is eligible for Brownfield Grant funding, and is:

Attachment A: Threshold Criteria

U.S. EPA Brownfield Site-Specific Assessment Grant Application
Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

- (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.

4. 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.

5. Sites Requiring a Property-Specific Determination

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

6. 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**
- 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) 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.
- (iv) 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.

Attachment A: Threshold Criteria

U.S. EPA Brownfield Site-Specific Assessment Grant Application

Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

- (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 (RAC) No. EP-S1-06-03, Task Order No. 0108-SE-BZ-0100, Nobis completed a Phase I ESA of the Site on behalf of the U.S. EPA, dated May 23, 2019. HBMI of the Administration Building and the Engineering and Research Building were also completed by Nobis Group on behalf of U.S. EPA on March 2, 2018 and May 23, 2019, respectively. Additionally, Ransom Consulting, Inc. (Ransom) prepared a Phase I ESA for the Site 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 10 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.
 - (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: The Site has been used as a pulp and paper mill for over 100 years, until the mill ceased operated in 2008. The on-Site contamination resulted from historic industrial use and storage/use of hazardous material and petroleum products during the mill's operation. 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 Site (fenced with a security check point). The Site and Site buildings are currently vacant and unused and have 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

Attachment A: Threshold Criteria

U.S. EPA Brownfield Site-Specific Assessment Grant Application
Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

exposure to any previously released hazardous substance. No significant earthwork, renovations, or modification to the site, resulting in a release of the hazardous materials to the environment, has occurred or is planned. Access to the property and the site buildings 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.

7. Waiver of the \$200,000 Limit

Our Katahdin is requesting a waiver of the \$200,000 limit and requests \$350,000 for the former Great Northern Paper Company site based on the anticipated level of contamination, scope of assessment services needed, and size of the site. A one-page justification for the waiver request is included as *Attachment C* to the Narrative. The justification includes a description of the extent of contamination at the site, the size of the site, and the reasons for requesting additional funding.

ATTACHMENT B

Documentation of Applicant Eligibility

Our Katahdin

**Former Great Northern Paper Company, Millinocket, Maine
U.S. EPA Brownfield Site-Specific Assessment Proposal**

Date: **DEC 30 2014**

OUR KATAHDIN
111 CANYON DRIVE
MILLINOCKET, ME 04462-2328

Employer Identification Number:
47-2382072
DLN:
26053758001584
Contact Person:
CUSTOMER SERVICE ID# 31954
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Public Charity Status:
170(b)(1)(A)(vi)
Form 990/990-EZ/990-N Required:
Yes
Effective Date of Exemption:
December 19, 2014
Contribution Deductibility:
Yes
Addendum Applies:
No

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

OUR KATAHDIN

Sincerely,

A handwritten signature in black ink that reads "Tamera Ripperda". The signature is written in a cursive, flowing style.

Director, Exempt Organizations

ATTACHMENT C

Site-Specific Assessment Grant Waiver of the \$200,000 Limit

Our Katahdin

**Former Great Northern Paper Company, Millinocket, Maine
U.S. EPA Brownfield Site-Specific Assessment Proposal**

Attachment C: Waiver of the \$200,000 Limit

U.S. EPA Brownfield Site-Specific Assessment Grant Application

Our Katahdin - Former Great Northern Paper Company, Millinocket, Maine

Waiver Request

Our Katahdin is requesting a waiver of the \$200,000 limit and requests \$350,000 for assessment of the former Great Northern Paper (GNP) site based on the anticipated level of contamination, scope of assessment services needed, and size of the site. The Site operated as a pulp and paper mill from circa 1900 to 2008. The GNP Site encompasses approximately 1,400 acres of land and has a campus of dilapidated mill buildings and structures that encompass approximately 100 acres along the western bank of Millinocket Stream.

Ransom Consulting prepared a Phase I Environmental Site Assessment for the Site on November 20, 2019 and identified a significant number of recognized environmental conditions and areas of concern which required further assessment. These included: historic industrial operations; hazardous material handling and storage; documented petroleum and hazardous material releases; historic filling with coal ash; a 350-gallon PCB oil release at the Riverbank Substation Transformer with insufficient cleanup actions; historic releases associated with the Bulk No. 6 Fuel Oil Tank Farm; The wastewater treatment plant, associated storage of hazardous materials (ammonia, phosphoric acid, caustics), and presence of residual sludge/solids remain in lagoons (observations suggest the liner is damaged and that sludge is spreading); the 1.4-acre former Brown Relic Dump and waste oil storage area with documented regulatory violations; an on-site Electrical Substation with significant oil staining observed; boiler ash stockpiles which have not been assessed; the 600,000-gallon unlined Ash Pond; the former Core Storage Facility which was used for storage of waste oil and chemicals; and various hazardous waste storage sheds.

Hazardous building materials, including asbestos, lead-based paint, universal wastes (i.e., PCB-containing fluorescent light ballasts, mercury-containing fluorescent lamps, etc.) and mold growth have also been identified (or are suspected to be present) in various on-Site buildings.

The enormity in scale associated with performing a Phase II ESA at the 1,400-acre GNP Site is overwhelming. To assess the RECs identified, extensive and thorough subsurface investigations and Hazardous Building Materials Inventories (HBMI) will be conducted. We have anticipated that a subsurface investigation of this nature may include hundreds of soil and building material samples, dozens of groundwater and soil vapor samples, and extensive field screening with a photo-ionization detector and XRF meter. A multi-day assessment of this type, which would include labor costs and expenses associated with a QEP, contractor/excavation subcontractor costs, and laboratory fees could cost the Site owner upwards of \$500,000.

The Site owner, Our Katahdin (OK), is a 501(c)3 non-profit organization formed to help the Town of Millinocket with reuse and revitalization planning at the GNP site, by redeveloping the mill into the One Katahdin Fiber Park. The assessment, and subsequent redevelopment of this Site will be completed entirely through grants and external funding sources. Any money received through these grants must be earmarked for the significant infrastructure, utility, and telecommunication improvements which are necessary to attract and secure tenants.

Municipal and local funds are not available. The median household income in Millinocket is \$32,333, which is only 60% of the median household income in Maine (\$53,024), and 10.1% of the population lives in poverty¹. These economic hardships have made it impossible for the Town to fund environmental and restoration projects.

OK is invested in the cleanup and redevelopment at the GNP site and is aware of the significant environmental costs which will be necessary. If this cost share waiver request is not granted, additional funds will be redirected to fund assessment activities, and other revitalization projects on-Site will be delayed or under-funded.

¹ 2017 American Community Survey, Census.gov

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="12/03/2019"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Our Katahdin"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/>	* c. Organizational DUNS: <input type="text" value="0802257180000"/>	
d. Address:		
* Street1:	<input type="text" value="P.O. Box 293"/>	
Street2:	<input type="text"/>	
* City:	<input type="text" value="Millinocket"/>	
County/Parish:	<input type="text" value="Penobscot"/>	
* State:	<input type="text" value="ME: Maine"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="04462-2328"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name:	<input type="text" value="Sean"/>
Middle Name:	<input type="text"/>	
* Last Name:	<input type="text" value="DeWitt"/>	
Suffix:	<input type="text"/>	
Title:	<input type="text" value="President"/>	
Organizational Affiliation: <input type="text" value="Our Katahdin"/>		
* Telephone Number: <input type="text" value="917-705-4669"/>	Fax Number: <input type="text"/>	
* Email:	<input type="text" value="sean@ourkatahdin.com"/>	

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Our Katahdin's GNP Site Specific Assessment Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="350,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="350,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed: