



December 22, 2023

Mr. David Chapman
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

RE: LeBlanc Dry Cleaners Investigation
10 Lafayette Street
Lewiston, Maine

Dear David:

At your request, Beacon Environmental Consultants, LLC (Beacon) completed a Ground Penetrating Radar (GPR) survey and limited concrete removal at the former LeBlanc Dry Cleaners (REM#02364) located at 10 Lafayette Street in Lewiston, Maine. See **Figure 1** for a Site Location Map.

SITE DESCRIPTION AND BACKGROUND

The Site is located at 10 Lafayette Street, Lewiston, Maine, identified by the City of Lewiston Assessor's Office as Tax Map 173, Lot 19, and has been the location of a wagon repair shop, steam dye facility, and dry-cleaning operation since 1914. The main Site building with the more current dry-cleaning operation was constructed on the Site circa 1955. At that time, the Site operated one dry cleaning unit which utilized Tetrachloroethene (PCE) as the primary dry-cleaning solvent.

The Phase I ESA completed by Ransom Consulting, Inc. (Ransom) in 2015 identified 4 RECs including the historic operations of the property as a dry cleaner using PCE, several historic USTs located on the Sanborn Fire Insurance Maps, 3 floor drains observed during the site inspection.

Site History

According to the property owner, the original dry-cleaning machine was vented to the exterior on the western side of the Site building. The original dry-cleaning unit and associated vent pipe remain in the Site building but have not been in operation since the early 1970's. This original dry-cleaning machine was replaced with a Renzacci dry cleaning unit in the 1970's, which operated until 2014, utilizing PCE throughout its operation. The owner ceased the dry-cleaning operation in November 2014, and used filters, pre-filter lint, and spent solvents from the Renzacci dry-cleaning machine were stored in the unoccupied building. Additionally, there was a coin operated dry-cleaning machine located in the building that reportedly contains PCE. All three dry-cleaning machines were located in the Site building and had not been cleaned.

PREVIOUS INVESTIGATIONS

Phase I ESA, Prepared by Ransom Consulting, Inc., May 14, 2015

This assessment has revealed the following recognized environmental conditions (RECs) in connection with the Site:

- The Site was historically operated as a dry-cleaning facility using the chemical tetrachloroethene or "Perc" as the primary dry-cleaning solvent. Staining observed on the concrete slab floor throughout the Site building suggests that Perc may have been released due to leaking machinery or inadvertent spillage. Based on the chemical

characteristics of Perc, and the condition of the concrete slab floor, these releases have the potential to have impacted soil, groundwater, and/or soil vapor conditions at the Site. Perc-containing condensate may also have been discharged to the surface of the Site as a result of ventilation from the historical dry-cleaning machine(s).

- Several underground storage tanks were identified on historical maps in the area of the boiler room. Although the tanks were identified as "gas tanks" on the historical maps, the contents of these tanks are unknown. Based on the historical use of the Site, the tanks likely contained fuel oil and/or dry-cleaning chemicals. No records regarding tank registration, installation, inspections, closure records, or knowledge from the Site owner were provided or identified during this assessment. Furthermore, it is not clear if these tanks have been removed from the Site. Unknown or unreported releases from these former tanks have the potential to have impacted the environmental condition of the Site.
- Three floor drains were observed in connection with the Site building. The discharge location of these floor drains could not be confirmed. The environmental conditions of the Site have the potential to have been impacted as a result of leaks or releases of dry-cleaning chemicals or petroleum products in connection with the floor drains.
- A vapor encroachment condition for surrounding properties cannot be ruled out without additional investigation. Surrounding properties have the potential to be impacted by contaminants associated with the Site, if such contaminants have been released to the environment.

Dry Cleaner Initiative Phase II ESA, Prepared by CES, Inc., October 29, 2015

On July 28, 2015, CES oversaw the installation of seven soil borings from which five were completed as temporary monitoring wells and groundwater samples were collected following MEDEP's Low Flow Sampling SOP. The groundwater sample from each monitoring well was submitted to Alpha Analytical Laboratory (Alpha) of Westborough, Massachusetts for analysis of the nine chlorinated compounds by USEPA Method 8260. Soil was screened with the MiniRae Photoionization Detector (PID) and a soil sample was collected from the depth that had the highest PID reading.

On September 2, 2015, CES oversaw the installation of one additional soil boring completed with a temporary monitoring well (B-08/MW-08) on the northwest side of the Site building.

On July 27, 2015 CES installed one 24-hour indoor air sample (IA-01) within the Site building. On July 28 and September 5, 2015, CES collected sub-slab vapor samples and soil gas samples for analysis.

CES recommended the following:

- Receptors west and southwest of the property should be identified and migration pathways should be further evaluated.
- The USTs discovered during the Phase II ESA should be removed or abandoned-in place in accordance with MEDEP regulations;
- The current property owner should complete Hazardous Waste Closure as required by EPA regulations;
- The current property owner should submit an application to the MEDEP Voluntary Response Action Program (VRAP) to secure the liability protections currently afforded by the Department.

Removal Program Preliminary Assessment/Site Investigation Report, Prepared by Weston Solutions, Inc., February 2017

Between April and December 2016, USEPA's START team personnel conducted ambient air, soil gas, and soil sampling around the site building as well as within the building. This investigation drove the need to complete the UST assessment as well as the hazardous waste removals completed in 2017.

MEDEP Trip Report, Prepared by MEDEP, March 2, 2017

MEDEP snaked ¼ inch HDPE tubing down vent line of UST to sample vapors to determine if UST contained fuel oil or PCE. MEDEP submitted one summa canister to Alpha Laboratory for APH and TO-15 analysis. PID readings were recorded between 300 and 390 ppm. Analytical results obtained from Alpha indicated elevated concentrations of vinyl chloride, tetrachloroethylene, cis-1,2-dichloroethene, C5-C8 aliphatics, and C9-C12 Aliphatics.

UST Assessment Report, Prepared by Beacon, December 2017

On September 27, 2017, one 300-gallon number two oil UST, one 2,000-gallon Stoddard Solvent UST, and on 500-gallon perchloroethylene UST were removed from the Site. On September 28, 2017 one 6,000-gallon number two oil UST was also removed.

EPI pumped out 7,430 gallons of non-regulated waste from the four USTs and 250-gallons of flammable liquids from the Stoddard Solvent UST.

Based on the lack of private and public wells on-site and in the area, the MEDEP determined that soils below two feet on the Site fell within the Excavation and Construction Worker Criteria of the Maine RAGs for Sites Contaminated with Hazardous Substances. Soils from ground surface to two feet below grade fell within the Park User Criteria of the Maine RAGs for Sites Contaminated with Hazardous Substances.

On-site observations indicated contamination was present two feet below grade. Lab data indicated that the impacts two feet below grade were below the Maine RAGs for Excavation and Construction Worker Criteria. Two of the surficial soil samples did have impacts above the Maine RAGs for Park User Criteria.

Beacon recommended the following:

1. If the building is demolished, piping previously connected to the perchloroethylene UST should be assessed per the MEDEP rules.
2. Impacted soils above the MEDEP RAGs for Park User Criteria were discovered within the top two feet in the areas of soil samples N Sidewall-02 and S Sidewall-02. If excavation is to occur in these areas, worker protection should be provided.

Hazardous Waste Removal Letter, Prepared by Beacon, December 2017

On August 31, 2017, Environmental Projects, Inc. (EPI) and Beacon completed a site visit to develop an inventory of hazardous substances and special wastes. Based on this inventory, EPI developed a cost estimate and provided it to Beacon on September 14, 2017. This estimate was provided to MEDEP on September 05, 2017 for review. A change order was given for the packaging and disposal of the materials on October 20, 2017.

Between October 9 and 16, 2017, EPI packaged and removed hazardous substances and special wastes from the property. A review of the property by Beacon on October 16, 2017 confirmed that no waste remained within the building.

Hazardous waste has been removed with exception of the floor. This should be handled as hazardous waste when the building is removed.

Phase I ESA, Prepared by Beacon, May 15, 2018

Beacon was retained by St. Mary's Regional Medical Center, to perform a Phase I Environmental Site Assessment (ESA) of the property known as LeBlanc Cleaners located at 10 Lafayette Street in Lewiston, Androscoggin County, ME (subject property). Beacon performed the ESA in conformance with the Scope of Work and the provisions of the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-13, thereby satisfying United States Environmental Protection Agency's (U. S. EPA) "Standards and Practices for All Appropriate Inquiries (AAI); Final Rule" (40 Code of Federal Regulations Part 312) Federal Register Vol. 70, No. 210, November 1, 2005.

At the time of the Phase I ESA, RECs were present in association with the property in the form of past usage of the property as a dry cleaner and the past USTs on the property. The potential for contamination should be determined prior to off-site disposal of concrete and soil.

Based on research completed, Beacon recommended:

- An ACM survey be completed prior to demolition;
- If the structure is demolished, sampling of the concrete slab should be completed to determine whether concrete exceeds hazardous waste guidelines;
- Soils beneath the slab should be sampled to document whether impacts above the MEDEP guidelines exist;
- RCRA Closure will be needed to be completed once the structure has been removed or a final investigation has determined that impacts are not present.

Memorandum, Prepared by MEDEP, December 21, 2022

The MEDEP attempted to complete a ground penetrating radar (GPR) survey within the site building; however, due to the amount of debris within the building, the survey was incomplete. A recommendation was made to hire a consultant or contractor to conduct a subsurface investigation within the building.

SCOPE OF WORK

Based on the potential presence of additional USTs under the building foundation, Beacon subcontracted with ProMark Utility Locating, Inc. to complete a GPR survey, concrete scanning, and electric sonde utility locating to determine if anomalies existed under the slab. Beacon also subcontracted with Environmental Projects, Inc. to assist in moving debris out of ProMark's way and if an anomaly was found, to remove concrete to allow for assessment of the anomaly.

On November 30, 2023, Beacon, ProMark, and EPI, met on-site with MEDEP staff David Chapman and Louise Roy to perform the work. EPI, Beacon, and MEDEP began moving materials within the northwest corner of the building (Previous dry cleaner machine location to clear the concrete for ProMark. See **Attachment A** for Site Photographs. Utilizing a GPR, scanning was completed in this area and continued to the front of the building with debris and materials moved prior to scanning. No USTs were identified using the GPR.

A pipe painted yellow was observed in the northwestern corner of the building, utilizing a Photoionization Detector (PID), Beacon obtained a reading of 340 parts per million by volume (ppmv). Concerned that this pipe may have been natural gas based on the color. Beacon contacted Unutil to determine if this was the case. Unutil sent a locator to the property who informed the group that no natural gas connection had ever been present at the property.

Switching to the electric sonde, ProMark attached a feed on the piping observed in the northwest corner of the building to attempt to discern where this interior pipe went as well as an exterior vertical vent pipe observed to the north of the structure. Both of these remained unclear so ProMark switched to the concrete scanner, this still was inconclusive.

At this time, Beacon requested that EPI utilize a jack hammer to remove the concrete around the interior pipe. Removing the concrete around the interior pipe showed that this pipe turned to the south. ProMark used the concrete scanner to determine that the pipe did in fact follow this track and that a second pipe was beside it following in this direction as well.

Beacon excavated soil on the exterior of the building where the PCE UST had been located and found the pipe where it entered the building. Water was poured into the interior pipe and it appeared in the excavation. A second excavation was completed to the south of the side entrance door and the end of another pipe was found. Utilizing the electronic sonde, ProMark discerned that this pipe was the end of the vent pipe observed to the north of the structure.

As no USTs were discovered, no samples for laboratory analysis were collected.

CONCLUSIONS

On November 30, 2023, Beacon, ProMark, EPI, and MEDEP staff completed a GPR survey within the building which also included concrete scanning, electronic sonde locating, and hand excavation. Piping formerly associated with the PCE UST was discovered to be present under the northwestern portion of the building. No USTs were discovered.

RECOMMENDATIONS

Based on work completed, Beacon recommends:

- An ACM survey be completed prior to demolition;
- If the structure is demolished, sampling of the concrete slab should be completed to determine whether concrete exceeds hazardous waste guidelines;
- If the building is demolished, piping previously connected to the perchloroethylene UST should be assessed per the MEDEP rules;
- Soils beneath the slab should be sampled to document whether impacts above the MEDEP guidelines exist;
- RCRA Closure will be needed to be completed once the structure has been removed or a final investigation has determined that impacts are not present.

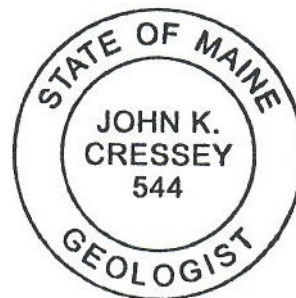
Please contact me with any questions or concerns.

Sincerely,

BEACON ENVIRONMENTAL CONSULTANTS, LLC



John K. Cressey, LG, PG
President/Principal Geologist



FIGURES

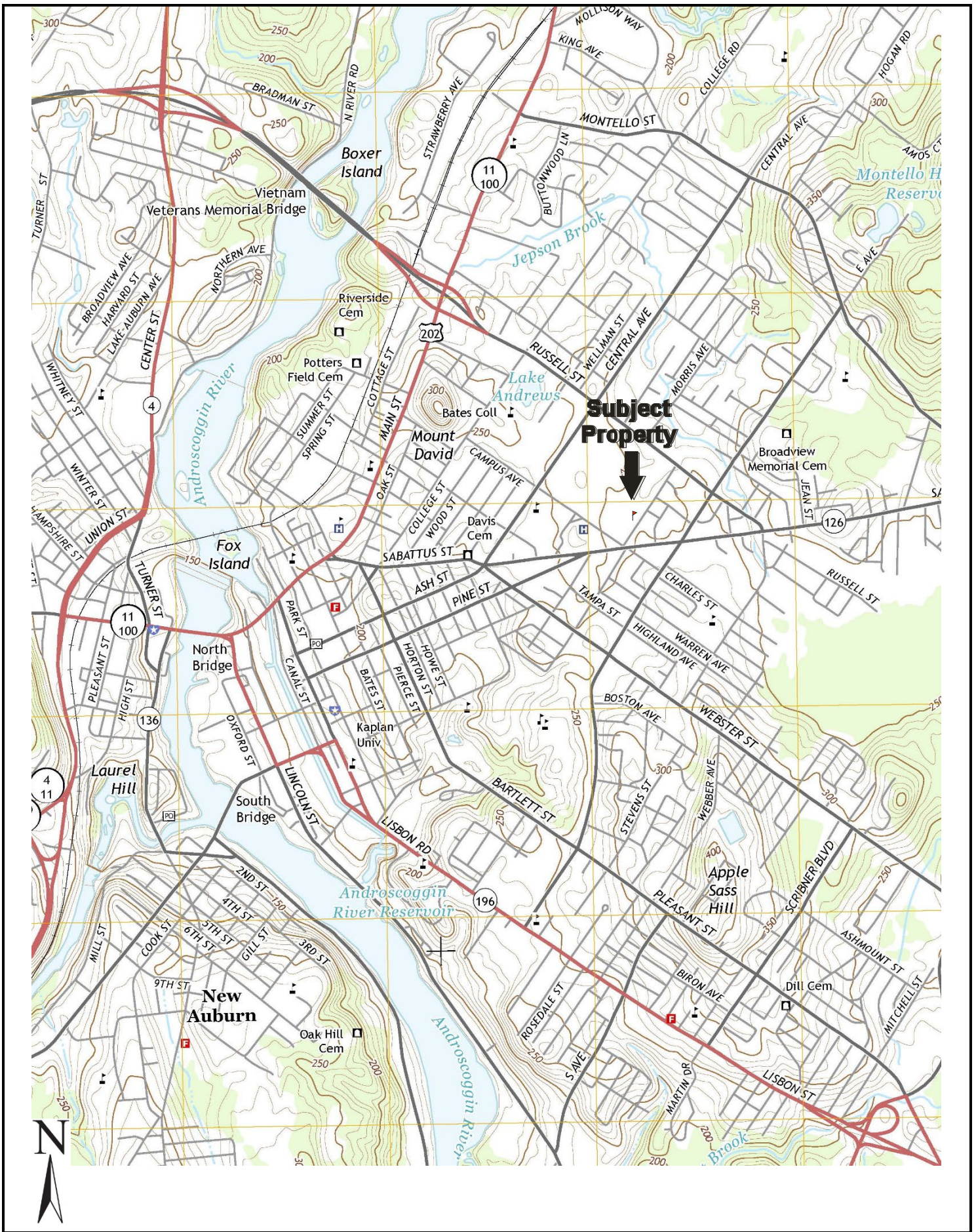


FIGURE 1: SITE LOCATION MAP
Project No. BE-661

Drawing Not To Scale



FIGURE 2: SITE FEATURES
LEBLANC CLEANERS, LEWISTON, MAINE
Project No.: BE-661

ATTACHMENT A
SITE PHOTOGRAPHS



Photo No. 1

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Interior of the site
building.

Photo By: JKC



Photo No. 2

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Removing concrete
around the interior pipe.

Photo By: JKC

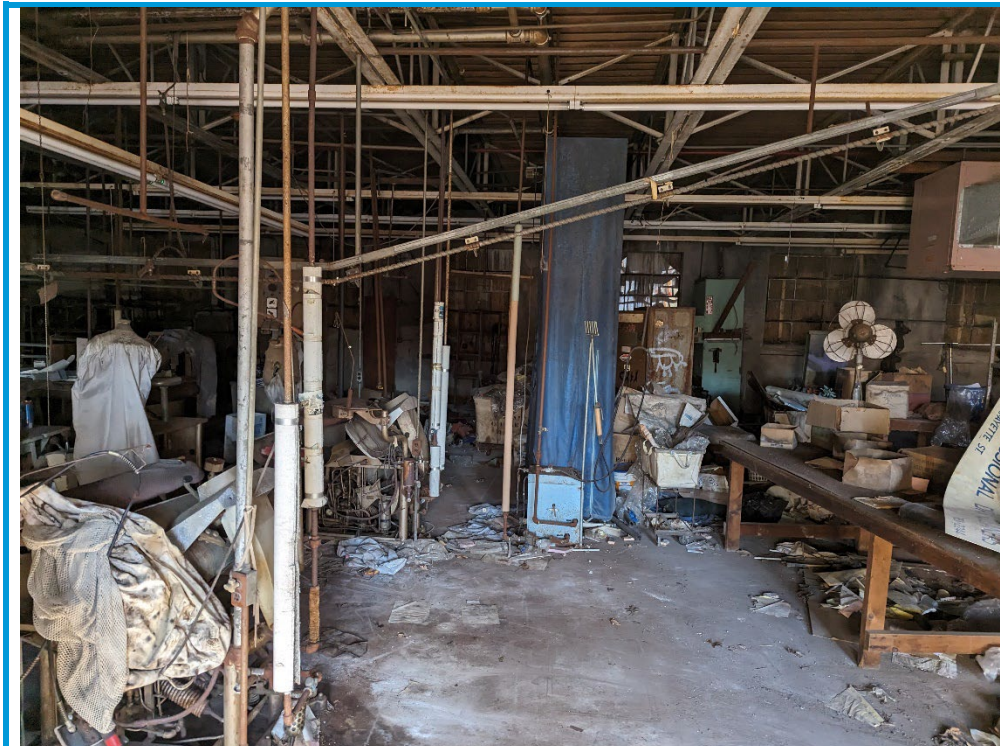


Photo No. 3

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Interior of the building
with a cleared area for
GPR work.

Photo By: JKC



Photo No. 4

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Interior of the building.

Photo By: JKC



Photo No. 5

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Interior of the building
with debris moved back to
an area after it had been
scanned.

Photo By: JKC



Photo No. 6

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Interior of the building
with a cleared area for
GPR work.

Photo By: JKC



Photo No. 7

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Location of former
product pipe on the
exterior of the site
building.

Photo By: JKC



Photo No. 8

Site Location:
10 Lafayette Street
Lewiston, Maine

Photo Date:
November 30, 2023

Description:
Preparing to pour water
down the interior pipe
(former product line).

Photo By: JKC