CLEANUP WORKPLAN

City of Caribou, Maine
Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement
Period of Performance: 5/16/2025 - 9/30/2029

1. CFDA: 66.818 Multipurpose, Assessment, Cleanup, and Revolving Loan Fund Grants

OBJECTIVE: The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amended the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. The Brownfields Utilization, Investment, and Local Development (BUILD) Act of March 2018 reauthorized and amended the Brownfields provisions of CERCLA. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients are selected from applications prepared in accordance with the "Application Guidelines for Brownfields Assessment, RLF, and Cleanup Grants," and submitted in a national competition. The *City of Caribou, Maine* as a *general-purpose unit of local government*, was selected for Cleanup funding in the FY 2025 competition.

Caribou is the most northeastern city in the U.S., is located on the Aroostook River, which is well-known for its scenic, historical, recreational, and trout and salmon fishery values. The international border with Canada is just 15 river miles downstream of the site. Until the late 1960s, Caribou was the world's largest potato shipping hub and was a service community to Loring Air Force Base until the base's closure in 1994, leading to a long period of disinvestment in the City. The Target Area of this Brownfield Grant is the Steam Plant site at the former Caribou Power Plant complex. The abandoned 10,700 square-foot, five-story building is in horrific disrepair with a leaking roof, broken windows, and must be continuously boarded up to prevent trespassing and vandalism. The Steam Plant presents an overwhelming series of challenges to Caribou, as the current owner, as it works to promote quality of life, economic development and a redeveloped riverfront.

Previous environmental assessments conducted at the Steam Plant identified asbestos is the main concern for cleanup, but contaminants such as lead, mercury, universal and hazardous wastes, and waste oil in electrical equipment, tanks, drums and vessels, are of concern as well. Prior assessments have identified over 2 miles of asbestos-wrapped steam and water pipes; 1,600 square-feet of asbestos-containing Transite electrical boards and panels; 14,000 square-feet of asbestos-coated condensers, ducts, vents, tanks, point heaters, steam headers, and vessels; two massive boilers coated with 8,200 square-feet of asbestos; 400 square feet of asbestos-containing floor tile and mastic; thousands of asbestos-containing piping gaskets; miles of asbestos-coated electrical wiring; 2,000 square-feet of asbestos-containing window glazing and caulking; and the entire roof (tar and gravel) is contaminated with asbestos. The asbestos-wrapped piping, condensers, ducts, tanks, vessels, and two massive boilers are double-wrapped in steel-mesh jacketing, which is to be extremely difficult and time-consuming to remove and resulted in exorbitant costs to properly remediate. The turbines are equipped with lead diaphragms and equipment, tanks, and piping coated in lead-based paint. Over 5,000 gallons of waste oil remain in boiler day tanks, separation tanks, turbine reservoirs, transfer pumps, and drums, which are deteriorating at a rapid pace

and would pose an unprecedented environmental risk to the Aroostook River if a catastrophic waste oil release occurs.

Since the site's abandonment, well prior to the City's acquisition, the roof has deteriorated and began leaking; metal scavengers damaged virtually everything inside, including asbestos containing materials and waste oil-containing structures. Non-friable asbestos has deteriorated, and large volumes of friable asbestos are present. A limited removal of friable asbestos was conducted in 2024 through CERCLA but further cleanup is needed to fully decontaminate the Steam Plant to make it safe for redevelopment. For full remediation, demolition of the Steam Plant is necessary. The estimated cost to properly remediate asbestos, lead-based paint, universal waste, and waste oil and to demolish the Steam Plant after CERCLA activities are completed is astronomical and would bankrupt Caribou if EPA Brownfields Cleanup funding was not secured.

The goal of the cleanup plan is removal of all waste oil, asbestos-containing materials, lead-based paint, and universal waste. The Community Engagement Plan (CEP) will be prepared, public meetings and 30-day comment period will be conducted, and the ABCA will be finalized. Site-Specific Quality Assurance Project Plan (SSQAPP) will be prepared, and confirmatory sampling will be completed to ensure cleanup measures are correctly implemented. As determined by the ABCA, the optimum cleanup will be to first remove waste oil and universal wastes. However, because the ACM and lead paint are so integrated with the building elements, boilers, and other infrastructure, the only practical means to clean up these materials is to remove them concurrently with building demolition so that public health and safety risks and environmental threats posed by the deteriorating building will be eliminated. This is imperative for redevelopment of the property.

During cleanup, the river and the public will be protected through erosion and sedimentation controls, dust suppression, site security, and perimeter air monitoring will to confirm dust/contaminants are not leaving the site. Waste oil will require field testing. All waste oil and hazardous substances will be removed for off-site disposal by a Maine Licensed Hazardous Waste Transporter in accordance with OSHA Hazardous Waste Operations and Emergency Management Standards and Maine Waste Oil Management Rules. All asbestos-containing materials, lead-based paint, and universal waste, and demolition debris will be removed for off-site disposal by a Maine Licensed Asbestos Abatement Contractor, Hazardous Waste Transporter and/or demolition contractor, in accordance with OSHA General and Construction Standards, Maine Asbestos Management Regulations, and Universal Waste and Solid Waste Management Rules. Approximately 90% of the demolition debris will be reused or recycled, including brick, steel and concrete. The project is expected to take one year to complete. Cleanup documentation will be submitted to MEDEP with a Voluntary Response Action Program (VRAP) Completion Report and a VRAP Certificate of Closure will be obtained.

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the *Caribou's City Manager* and *Special Projects Coordinator*, with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and Brownfields Advisory Committee (BAC).

2. FUNDING: $4,000,000

3. BUDGET

	Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach	Task 3: Site Specific Activities	Task 4: Oversee Cleanup	Total
Personnel	$0	$0	$0	$0	$0
Fringe Benefits	$0	$0	$0	$0	$0
Travel	$9,960	$0	$0	$0	$9,960
Equipment	$0	$0	$0	$0	$0
Supplies	$0	$0	$0	$0	$0
Contractual	$9,500	$8,000	$30,000	$47,500	$95,000
Construction	$0	$0	$3,895,040	$0	$3,895,040
Other:	$0	$0	$0	$0	$0
Total Direct Costs	$19,460	$8,000	$3,925,040	$47,500	$4,000,000
Indirect Costs	$0	$0	$0	$0	$0
Total	$19,460	$8,000	$3,925,040	$47,500	$4,000,000

The applicant, the *City of Caribou*, is not seeking EPA funds for their own administrative costs, and as such, it is less than the 5% cap.

The applicant, the *City of Caribou*, is not seeking EPA funds for equipment for the project.

4. WORKPLAN TASKS

Task 1: Cooperative Agreement Oversight

Task 1 - Cooperative Agreement Oversight Subtasks (Commitments)	Anticipated Outputs (activities, deliverables, reports) and Anticipated Outcomes (results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Obtain QEP: • Prepare Request for Qualifications, evaluate applications, conduct interviews, hire qualified environmental professional (QEP) • Conduct annual performance evaluations on QEP	Outputs: • RFP/RFQ; documentation of meeting of open competition; contract for scope of services • Performance evaluation reports, and applicable corrective actions Outcomes: • High quality products and services to meet project needs • Maintain a high level of work effort	12/2025	
Develop a Brownfields Advisory Committee • Include City staff (including legal representation as appropriate), representatives from community organizations, QEP, MEDEP and EPA	Outputs: • Regular meetings, meeting agendas, attendance lists and meeting notes Outcomes: • An active and motivated workgroup driving BF initiatives	BAC developed: 10/2025 First Meeting: 10/2025	
Reporting: • Prepare MBE/WBE annually, and FFR form at the end of the reporting period • Enter site data in ACRES • Prepare Quarterly Reports via ACRES • Prepare final report and grant closeout material	Outputs: • Quarterly reports and other forms; updated ACRES database; final report and closeout forms • "Success Story" fact sheets Outcomes: • Regular communication of project status and next steps; database for congressional reporting	01/2026 ACRES updates and Quarterly Reports every quarter; MBE/WBE forms annually by 9/30; SF425 FFR annually by 10/30	
Records: • Maintain grant files • Maintain site project files • Maintain financial records	Outputs: • Accurate and complete files suitable for audit purposes Outcomes: • High quality project records reflective of the work performed	10/2025 and thereafter	
Requests for reimbursements or advances	Outputs: • Drawdowns from ASAP Outcomes: • Reduce unliquidated obligations	10/2025 and thereafter	
Training: • Attend National EPA Brownfields Conference	Outputs: • Attend BF Conference in Chicago • Attend Regional Brownfields Events Outcomes: • Improve BF knowledge and expand networking opportunities	Conference: 08/2025 12/2026	

Task 2: Community Engagement

Task 2 – Community Engagement Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Prepare Community Engagement Plan Prepare plan to involve public in cleanup activities	Outputs: • Plan for involving the community in cleanup activities Outcomes: •Improve understanding and participation in cleanup and redevelopment process	03/2026	
Establish Information Repository	Outputs: • Repository of documents which allows public to review site assessment & cleanup history Outcomes: • Improve understanding of how cleanup alternative was selected	09/2026	
Implement 30-Day Public Comment Period on ABCA	Outputs: • Allow for review and comment of cleanup related documents Outcomes: • Allow for consensus on cleanup	03/2026	
Public Meetings	Outputs: • Meetings which inform public of cleanup activities and provide a chance for input & comment Outcomes: • Improve understanding of cleanup and allow for potential modifications based on public input	12/2026	

Task 3: Site-Specific Activities

Task 3 – Site-Specific Activities Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Hold a kickoff meeting with State, EPA and QEP	Outputs: • Held meeting Outcomes: • Ensure all agencies are in agreement with cleanup plan	03/2026	
Ensure Site is Enrolled in MEDEP VRAP • Ensure the grantee has enrolled site in the applicable state response program	Outputs: • Site is enrolled in applicable state response program Outcomes: • Cleanup is in compliance with state response program	03/2026	
Historic Preservation • Assist EPA project Officer in collecting information and determining if Section 106 applies	Outputs: • Information and reports required to comply with Section 106 Historic Preservation requirements Outcomes: • Compliance with Section 106 Historic Preservation requirements	03/2026	
Prepare Analysis of Brownfields Cleanup Alternatives (ABCA)	Outputs: • Approved ABCA documenting how and why cleanup alternative was selected • ABCA placed in information repository, etc. Outcomes: • Ensure proper cleanup alternative is selected and communicated to the public	03/2026	
Resilient and Greener Cleanups • Evaluate the extreme weather vulnerability of a site and potential cleanup alternatives • Include extreme weather vulnerability in the effectiveness evaluation of cleanup alternatives. • Incorporate resilient and green remediation principles/techniques into the cleanup plan for your project	Outputs: • Resiliency and greener cleanup language in ABCA and RFP • Track and report resiliency and greener cleanup actions in ACRES Outcomes: • Resilient and more sustainable cleanups	Before, during, and after remedial activities	
Prepare Decision Document Document results of public comment period and public meeting to include comments received, public meeting attendance, response to relevant comments, selection of final cleanup remedy, any changes to the final cleanup remedy, etc.	Outputs: • Memo or letter, with appropriate attachments Outcomes: • Ensure that public comment process is documented and final cleanup remedy is selected	03/2026	

Task 3 – Site-Specific Activities Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Prepare Remedial Design & Engineering Documents Prepare appropriate remedial design documents for state response program, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to clean up sites	• Approved remedial action and engineering/design documents and an approved budget • Place documents in information repository, etc. Outcomes: • Ensure cleanup will be done in compliance with state response program and EPA funds will be used for eligible costs	06/2026	
Prepare Site Specific Quality Assurance Project Plan and Health and Safety Plan Prepare a SSQAPP for any environmental post cleanup sampling to be conducted on sites and submit to EPA for approval	Outputs: • EPA approved SSQAPP • Place SSQAPP in information repository Outcomes: • Ensure proper confirmatory testing methods and analytical data results are achieved	06/2026	

Task 4: Oversee Cleanup

Task 4 – Oversee Cleanup Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Oversight of Cleanup Activities • QEP conducts appropriate site inspections during remediation to ensure compliance with cleanup plans	Outputs: • Number of inspections • Site reports by QEP • Closure Report & Grant Close-Out Documentation • Documents placed in information repository Outcomes: • Ensure cleanup is conducted in compliance with VRAP	12/2027	
Davis-Bacon Documentation • Conduct site inspections to ensure proper wage rates and posters are available to workers on-site • Collect, review and maintain payrolls • Conduct onsite labor interviews	Outputs: • Payrolls, labor interviews, etc. Outcomes: • Ensure compliance with Davis-Bacon requirements	12/2027	

5. QUALITY ASSURANCE

Prior to undertaking confirmatory sampling, the *City of Caribou* will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, and the methods and procedures that will be used. QAPP approval will be obtained prior to performing any field activity.

6. PRE-AWARD COSTS

The *City of Caribou* has requested pre-award costs for travel to the mandatory EPA meeting in Portland in June 2025 and for two employees to travel to the National Brownfields Conference in Chicago in August 2025.

7. BUDGET DETAIL - Attachment 1

2025 Workplan Budget Detail for Cleanup Grants

Personnel (Should not exceed 10% of total federal funds):

Item	Rate/Hour	Hours	Request from EPA
Total			**$0**

Fringe Benefits:

Rate/Base/Composition		Request from EPA
		$0
Total		**$0**

Travel:

Item	Request from EPA
Travel to 2025 National Brownfields Conference and 2026 New England conference including lodging, air, per-diem, and registration fees for 2 employees. And any other EPA meetings required.	$9,960
Total	**$9,960**

Supplies:

Item	Request from EPA
Total	**$0**

Contractual:

Item	Request from EPA
Qualified Environmental Professional - CA Oversight	$9,500
Qualified Environmental Professional - Community Engagement	$8,000
Qualified Environmental Professional - Site-Specific Activities	$25,000
MEDEP VRAP Application & Fee	$5,000
Cleanup Contractor - Site-Specific Activities	$3,895,040
Qualified Environmental Professional - Oversee Site Cleanup	$47,500
Total	**$3,990,040**

Other:

Item	Request from EPA
Total	**$0**

Indirect Administrative Costs (This amount plus any direct administrative costs shall not exceed 5% of total federal funds):

Item		Request from EPA
Total		**$0**

Total Budget Summary:

Item	Request from EPA
Personnel	$0
Fringe Benefits	$0
Travel	$9,960
Supplies	$0
Contractual	$3,990,040
Other	$0
Indirect Costs	$0
Total	**$4,000,000**

Notes:
