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REMEDIATION AND SHORELINE STABILIZATION PLAN VOLUNTARY RESPONSE ACTION PROGRAM 34 KIDDER POINT ROAD SEARSPORT, MAINE

Property Owner:	GENERAL ALUM NEW ENGLAND CORP. 34 Kidder Point Road Searsport, ME 04974

Prepared for: GAC CHEMICAL 34 Kidder Point Road Searsport, ME 04974

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REMEDIATION AND SHORELINE STABILIZATION PLAN VOLUNTARY RESPONSE ACTION PROGRAM

FOR

GAC CHEMICAL 34 KIDDER POINT ROAD SEARSPORT, MAINE

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REMEDIATION AND SHORELINE STABILIZATION PLAN VOLUNTARY RESPONSE ACTION PLAN GAC CHEMICAL

SECTION 1 | INTRODUCTION

This report summarizes the investigations completed by CES, Inc. (CES) for the property located at 34 Kidder Point Road in Searsport, Maine and identified by the Town of Searsport Tax Assessor's Office as Lots 82 and 83 of Tax Map 7 (the Site). These recent investigations were completed along the intertidal area and within an area of interest (Lot 83) as described below by CES for, and at the request of, GAC Chemical in support of their Voluntary Response Action Program (VRAP) application submitted to the Maine Department of Environmental Protection (MDEP) on August 27, 2014. This plan describes the proposed remediation and shoreline stabilization to address the low pH conditions outlined in the *Investigations Summary Report* (CES, 2014). A separate *Public Communications Plan* (CES, 2014) has been prepared to address the MDEP VRAP Public Communications Decision Matrix (MDEP, effective January 1, 2008).

SECTION 2 | SITE BACKGROUND

2.1 Site Location and Legal Description

The Site is located at 34 Kidder Point Road, Searsport, Maine as shown on **Figure 1**. The Town of Searsport Tax Assessor's Map 7 identifies the Site as Lots 82 and 83 which consist of approximately 152 acres of land. The investigations summarized in this report were completed along the intertidal area and within an area of interest on Lot 83 of Tax Map 7. Refer to **Figure 2** for a Site Plan including a portion of the tax map showing the Site. The Waldo County Registry of Deeds has a legal description of the Site recorded on Page 294 of Book 1440.

2.2 Physical Setting

The U.S.G.S. 7.5 minute Quadrangle Map of Searsport, Maine shows that the Site is located to the east of Route 3 and is at an elevation between 0-120 feet above sea level. Lot 83 of the Site is bounded to the west by the Bangor and Aroostook Railroad and to the north, east, and south by tidal flats and Stockton Harbor.

2.3 Site Development

The Site is currently developed as a chemical manufacturing facility that produces a variety of chemicals such as: ammonium sulfate, liquid alum, aqua ammonia; and distributes sulfuric acid, specialty flocculants and coagulants, and customized chemical blends. The majority of the activities associated with the current use of the Site are conducted on Lot 82 of Tax Map 7.

Based on a review of municipal, regulatory, and historical records, the Site has been developed for commercial and/or industrial purposes since the early 1920s. Historical



manufacturing activities were conducted on both Lot 82 and Lot 83 of Tax Map 7. The investigations summarized in this report were completed on Lot 83 of Tax Map 7. Historical activities on Lot 83 include a sulfuric acid manufacturing plant that ceased operations in 1989, a sulfur storage area, a fertilizer manufacturing facility, a superphosphate plant, storage buildings, and a maintenance garage.

Structures remaining on Lot 83 include the historical sulfuric acid plant, a maintenance garage, and a wastewater treatment plant. Underground structures include catch basins and storm drains that direct stormwater runoff from portions of Lot 82 and portions of Lot 83 into the wastewater treatment plant located on the eastern portion of Lot 83. Here the combined wastewater and stormwater are treated before being discharged to Stockton Harbor. The discharge from the wastewater treatment plant is managed in accordance with the site's Waste Discharge License (WDL) issued by MDEP.

2.4 **Previous Investigations**

Numerous investigations identifying soil, surface water, and groundwater contamination at the Site have been conducted since the 1980s and prior to GAC Chemical acquiring the Site in 1994. Reports describing the results of these investigations were provided to the MDEP previously. Based on the findings of the historical investigations at the Site, contaminated soil, groundwater, and surface water exist at the Site due to historical releases of contaminants associated with industrial activities at the Site.

Documentation on file with the MDEP identifies multiple sulfuric acid spills that have occurred since 1981 in the area surrounding the historical sulfuric acid plant with varying levels of response and cleanup.

The most recent investigation was conducted during 2014 and included verbal input and approval of MDEP VRAP personnel (CES, 2014).

2.5 Conceptual Site Model

The following table summarizes the updated Conceptual Site Model (CSM) for the site after the completion of onsite investigations and sampling in 2014.

SOURCE AREAS	Areas of historical sulfuric acid spills (vicinity of sulfuric acid plant), sulfur storage area (soil bacteria use sulfur to produce sulfuric acid)	
PARAMETERS	Low pH	
POTENTIAL MEDIA AFFECTED	Soil, groundwater, surface water, stormwater	
POTENTIAL EXPOSURE ROUTES	Current exposure pathways: • Dermal risk of decreased pH water in tidal zone Potential exposure pathways:	



	 Dermal contact with soil, groundwater, surface water, and/or stormwater 		
POTENTIAL	Migration pathways:		
MIGRATION	 Flow of low pH groundwater into tidal zone 		
PATHWAYS	 Stormwater runoff from exposed soils 		
	Potential receptors include:		
RECEPTORS	Current and future site workers		
	 Ecological receptors in tidal zone 		

SECTION 3 | SITE INVESTIGATIONS

Investigations at the site were conducted in coordination with MDEP verbal discussions, meetings, and a site visit during 2014. The conceptual site model was adjusted based on observations and sampling results completed during our investigations. A summary of the investigations, findings and conclusions, and recommendations are described in the *Investigations Summary Report* (CES, 2014).

SECTION 4 | PROPOSED REMEDIATION AND SHORELINE STABILIZATION

4.1 **REMEDIATION OF INLAND AREA – HISTORICAL SULFUR STORAGE AREA**

As described in the *Investigations Summary Report* (CES, 2014), the source of the low pH conditions in the intertidal area is likely from groundwater flow from the area of interest (i.e., the historical spills of sulfuric acid in the vicinity of historical sulfuric acid plant and the historical sulfur storage area). Based on the observations from soil borings and test pits completed in the vicinity of the historical sulfur storage area, varying amounts of unused sulfur remain beneath a thin layer of clean gravel. The presence of the unused sulfur beneath ground surface was previously unknown to GAC. As known in the agricultural industry, sulfur is applied to agricultural land in which the soil bacteria use the sulfur to produce sulfuric acid thereby lowering the pH (Michigan State University Extension, 2012). No other materials or waste were encountered in the recent 2014 investigations or previous investigations conducted on the Site that would contribute to the low pH in the intertidal area.

Therefore, the proposed remediation of the inland area of interest will involve removal of visible sulfur to the extent practical and managed in accordance with applicable regulations, and in-situ treatment (i.e., liming). This approach is consistent with the *Guidelines for Landfill Disposal of Sulphur Waste and Remediation of Sulphur Containing Soils* (Government of Alberta, 2011).

The remaining unused sulfur will be excavated to the extent practical using standard excavation techniques (e.g., backhoe, excavator, loader) and stored in a covered, leak-proof container. The recovered unused sulfur will be used in an ordinary manner of use. This remediation activity is within 75 feet of the shoreline, and therefore, cannot be initiated until a Natural Resource Protection Act (NRPA) Permit By Rule (PBR) is submitted and approved by the MDEP. In addition, proper erosion and sedimentation control (E&SC) best management practices must be



installed in accordance with the Remediation and Shoreline Stabilization Plan (**Figure 3**) before soil disturbance occurs. The excavation contractor will remove the clean gravel and stockpile on-site for grading material. Once the unused sulfur is removed to the extent practical, a composite sample will be collected in accordance with USEPA SW-846 to confirm that the total residual concentration of sulfur is less than the proposed cleanup goal of 4% [elemental sulfur (S) plus sulphate (SO₄)] in the soil (Government of Alberta, 2011). The remaining soil and clean gravel will be graded as shown on the Remediation and Shoreline Stabilization Plan (**Figure 3**). The purpose of the proposed grading plan is to promote infiltration into the subsurface, minimize stormwater runoff, and to optimize the in-situ treatment using an alkaline product (e.g., limestone).

Once the cleanup goal is achieved and the grading of the area is approved by CES and MDEP, the in-situ treatment (i.e., liming) will be performed as follows:

- a composite sample (USEPA SW-846) will be used to estimate the acid neutralizing capacity (ANC) of the soil;
- the amount of alkaline product needed will be calculated; and
- a combination of finely ground alkaline product (90% passing a 60 mesh sieve) to maximize lime treatment and course crushed limestone (e.g., ½ to 2 inch) to minimize runoff and airborne particulate matter will be applied to the surface in the amount calculated above and in accordance with the Remediation and Shoreline Stabilization Plan (Figure 3).

The removal of unused sulfur and in-situ treatment will neutralize the low pH soil and groundwater over time.

4.2 SHORELINE STABILIZATION AND REMEDIATION

MDEP personnel from the Eastern Maine Regional Office (EMRO) have conducted site inspections to evaluate the shoreline and potential erosion. The MDEP concluded that the shoreline did not require any further erosion control or stabilization measures. However, given GAC's environmental stewardship and commitment to proactively ensuring that their operations are conducted consistent with all environmental and other regulatory requirements, GAC is proposing to implement shoreline stabilization in the area of interest. The objectives of the shoreline stabilization are (1) to stabilize any potential erosion within the area of interest, and (2) provide in-situ treatment of the low pH groundwater that is flowing into the intertidal area.

Shoreline stabilization projects require a NRPA PBR to be submitted and approved by the MDEP. Prior to using equipment in or on the shoreline, the contactor will confirm with CES that the proper permit approvals have been received. Also, the E&SC BMPs outlined in Remediation and Shoreline Stabilization Plan (**Figure 3**) must be implemented.

Limestone based rip rap (D_{50} =12 inch, D_{50} =6 inch) will be used as toe of slope stabilization. The area between the normal high water and elevation identified by CES will be excavated. A finely



ground alkaline product (90% passing a 60 mesh sieve) will be placed in this area and a geotextile will be placed in accordance with manufacture's recommendations. This toe of slope stabilization will also increase the pH of the groundwater that is flowing into the tidal zone.

Any debris encountered (e.g., cribwork) in the area of concern will be relocated to a storage area on-site. Planting of vegetation and leveling of slopes will be conducted in accordance with Remediation and Shoreline Stabilization Plan (**Figure 3**).

SECTION 5 | MONITORING

GAC conducts frequent monitoring in accordance with their environment licenses. The following monitoring will be added to their routine environmental monitoring program and submitted to VRAP in Electronic Data Deliverable (EDD) format. Up to five surface water and pore water locations within the intertidal area will be sampled and analyzed for pH in accordance with the procedures outlined in the *Investigations Summary Report* (CES, 2014).

SECTION 6 | REFERENCES

Investigations Summary Report, CES, 2014.

Public Communications Plan, CES, 2014.

Lowering the Soil pH with Sulfur, Mark Longstroth, Extension Small Fruit Educator, Michigan State University Extension, December 14, 2012.

Guidelines for Landfill Disposal of Sulphur Waste and Remediation of Sulphur Containing Soils, Government of Alberta, September 12, 2011.



FIGURE 1

SITE LOCATION MAP

JN: 10060.007





SOURCE: U.S.G.S. TOPOGRAPHIC QUADRANGLE SEARSPORT @ 1:24,000





FIGURE 2

SITE PLAN





FIGURE 3

REMEDIATION AND SHORELINE STABILIZATION PLAN



Ш ND SHORELIN PLAN ₹z ATIO m A N ЦΩС R1 R2 R3 R4 R6 CHECKED BY AMD/ TRB/DSP DSF **FIGURE 3**



APPENDIX A

LOWERING THE SOIL PH WITH SULFUR MICHIGAN STATE UNIVERSITY EXTENSION

Lowering the Soil pH with Sulfur. Mark Longstroth, Extension Small Fruit Educator

Blueberries prefer acid soils with a pH of 4.5 to 5.5. With the popularity of blueberries many people are interested in quickly adjusting their soil pH. Acidifying soil is not an exact science; this handout is just a guide. The cheapest way to lower the soil pH is to add elemental sulfur to the soil. Soil bacteria change the sulfur to sulfuric acid, lowering the soil pH.

If the soil pH is greater than 5.5, apply elemental sulfur (**S**) to decrease the soil pH to 4.5 (see Table 1). Spring application and incorporation work best. Soil bacteria convert the sulfur to sulfuric acid lowering the soil pH. It is important to note that this is a biological process (slow) and not a chemical reaction (rapid). The bacteria are active, when the soil is moist and warm. The soil temperature needs to be above 55F. The bacteria are not active in the winter so fall applications of sulfur have little effect on the soil pH next spring. In addition, the soil must not be saturated, or flooded (anaerobic) or the sulfur is converted to hydrogen sulfide (rotten egg smell) by anaerobic bacteria. Hydrogen sulfide kills plant roots. Irrigate to maintain soil moisture but do not over irrigate the soil. This causes flooding and anaerobic conditions. Most Michigan irrigation water is high in alkalinity (dissolved lime) and will gradually raise the soil pH.

The amount of sulfur required is dependent on soil texture. Clay and organic matter act as a buffer, absorbing and releasing mineral ions. Relatively little sulfur is needed on sands, whereas soils high in clay or organic matter require much more. It is important to apply and incorporate sulfur <u>at least a year</u> before planting. This allows the sulfur time to react and lower the soil pH before planting. Do not assume that the change can be completed in a short time. If large changes in pH are needed, than the change will that longer than a small change.

Table 1. Elemental sulfur ¹ needed to lower pH to 4.5 (lb./acre)				
	Soil type			
Current pH	Sand	Loam	Clay	
5.0	175	530	800	
5.5	350	1030	1600	
6.0	530	1540	2300	
6.5	660	2020	3030	
7.0	840	2560	3830	

¹To substitute ferrous sulfate, multiply by 8.

Sulfur cannot be easily incorporated to the soil after plants are present. Surface-applied sulfur provides the same pH reduction as incorporated material, but takes longer. Check soil pH again before planting and apply additional sulfur if needed. Do not apply more than 400 lb. sulfur per acre at a time to established plantings. When large amounts are needed, spread the application out over several years. Cultivation to aerate the soil and irrigation to maintain soil moisture can speed the process

To contact an expert in your area, visit people.msue.msu.edu, or call 888-MSUE4MI (888-678-3364).

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Ferrous sulfate also decreases soil pH, but it is more costly to use than sulfur. Eight times more ferrous sulfate is needed than elemental sulfur. The ferrous sulfate reaction is quicker, since this salt disassociates into iron and sulfuric acid. The iron binds to the clay or precipitates out of the soil solution leaving the sulfuric acid. Aluminum sulfate also acidifies soils, but there are reports that it can be toxic to blueberries if high rates are applied. Many people want to change the soil pH right now! To do this you need to add acid to the soil. Some growers have even irrigated with dilute sulfuric acid to lower the soil pH. This can cause problems for some irrigation systems. Very acidic water gradually corrodes metal pipes and fittings, and can cause injury if applied directly on plants.

Potential blueberry growers with high pH soils on their potential site need to know the soil texture to determine the amount of sulfur to apply to the site. Soil samples may not give a texture but always give a value for the CEC or Cation Exchange Capacity. The CEC can be used to estimate soil texture. Below are the CEC ranges used to estimate soil texture by the Michigan State University's <u>Soil & Plant Nutrient Laboratory</u>.

General range of CEC for different soil texture groups:		
Soil Type	CEC	
Loamy sand:	< 5 meq/100 g	
Sandy loam:	6-8 meq/100 g	
Loam:	9-12 meq/100 g	
Clay loam:	12-17 meg/100 g	

The CEC or Cation Exchange Capacity can be used to estimate soil texture

For example, if your soil sample had a soil pH of 6.5 and a CEC of 12-meq/100 g, this suggests a loam soil. Table 1 in indicates over 2000 lb. of S per acre would be needed to reduce the soil pH, 2 pH points, to 4.5. Each pH point is 10 times the value of other points. Two pH points will not double the soil acidity but increase it 100 times. This is a large shift in pH and unlikely to be accomplished quickly. Not a few days or weeks but one or more probably two years.

Ideally, 2,000#/A of sulfur would be applied early in the season the year before planting and the pH would be checked again in the fall and the following spring. If the soil pH was below 5.5 then blueberries could be planted in the spring. If the soil pH was high in the fall and still high in the spring more sulfur should be added before the fall planting of blueberries.

Since more than 400 lb. S should not be applied more than once a year to established plants, correcting the pH here will require 5 years of 400 lb. applications in the spring if the pH was not corrected before planting. I doubt the poor growth of the planting while the pH is being corrected would justify the time saved by planting before the pH was in the 4.5 to 5.5 range.

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