

CONTROL DEVICES, INC. AND	2	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

license modification but did not provide comments. Additional information supporting the application was submitted to the Maine Department of Environmental Protection (ME DEP) on July 12, 2012 and August 22, 2012.

The draft order was reviewed by the Board of Environmental Protection and approved on November 15, 2012. The draft document was the subject of a public notice in the Portland Press Herald newspaper on November 19, 2012. The 45 day comment period ended on January 3, 2013. No comments were received by the Department.

- B. Applicants' Information and Responsibilities: The facility is located at 228 Northeast Road in the Town of Standish. The EPA ID # for hazardous wastes generated at the manufacturing building by CDI is ME5000000802. The EPA ID # for hazardous wastes related to the pump and treat system for the former surface impoundment by GTEOSI is MED058951047.

CDI is a wholly-owned subsidiary of Sensata Technologies, Inc., a Delaware Corporation whose principal office is located in Attleboro, Massachusetts. CDI is registered and in good standing with the Maine Secretary of State as a corporation duly qualified to conduct business in the State of Maine. CDI continues to own the property, facility and structures in Standish.

GTEOSI is a wholly owned subsidiary of GTE Products of Connecticut Corporation (IRS ID Number 13-2884758) which is in turn a wholly owned subsidiary of GTE Corporation (IRS ID Number 13-1678633). GTEOSI has one subsidiary corporation, West Indies Telephone Company, in Haiti. GTEOSI is registered and in good standing with the Maine Secretary of State as a corporation duly qualified to conduct business in the State of Maine.

GTEOSI and CDI share responsibilities for activities under the 2003 Post Closure License. GTEOSI is primarily responsible for operation and maintenance of the active ground water remediation pump and treat system and for conducting groundwater monitoring. CDI is primarily responsible for maintenance and inspection of the closed surface impoundment, including cap integrity, security, and monitoring the cap for settlement. At such time as the groundwater remediation is completed and operation of the active remediation system ceases, CDI will assume responsibility for groundwater monitoring.

CONTROL DEVICES, INC. AND	3	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT.
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

C. Regulatory History: The former surface impoundment was used by GTE Products Corporation from 1968 to 1982 for the storage and treatment of copper and tin plating wastewater, as well as various acids and inorganic salts. On August 27, 1980 GTE Products Corporation applied for and was granted the Interim Hazardous Waste Facility License #I-030 by the Board, also referred to as # O-000070-HK-A-N.

In 1982 GTE Products Corporation requested permission from the Department to close the surface impoundment. GTE Products Corporation subsequently closed the impoundment in August 1982 by a process that included removing the liquids, backfilling with gravel fill, and capping with topsoil.

On April 22, 1987 the Board approved an Administrative Consent Agreement and Enforcement Order entered into between ME DEP, The Office of Attorney General, and GTE Products Corporation. The Order in part determined that the surface impoundment final closure must comply with hazardous waste regulations pursuant to 40 CFR Part 265. The Order required GTE Products Corporation to submit a closure plan detailing the actions taken when the surface impoundment was discontinued; to develop and submit a post-closure plan for the surface impoundment; and to develop and submit a groundwater monitoring program. GTE Products Corporation implemented all actions as required under the 1987 Administrative Consent Agreement and Enforcement Order.

On October 3, 1988 the Board approved GTE Product Corporation's closure plan (Phase I) for the preliminary groundwater and soil investigation and the closures of the Container Storage Building and the Sludge Handling Areas with additional requirements. On September 14, 1990 the Department approved GTE Product Corporation's closure plan (Phase II) for the surface impoundment with additional requirements. That corporation subsequently implemented an impoundment closure program which included removal of impacted soils and construction of a cap designed to meet the requirements of RCRA in accordance with a September 14, 1990 Department Order. On February 27, 1992 GTE Control Devices, Inc. and an independent professional engineer submitted a certification of closure report for the surface impoundment. A construction discrepancy in the cap was identified during the preparation of the certification of closure. Hence, GTE Control Devices, Inc. submitted a technical discussion document on March 26, 1992 in support of the performance-based Certification of Closure. GTE Products Corporation, and its

CONTROL DEVICES, INC. AND	4	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

successor in interest, GTE Control Devices, Inc., implemented all actions as required under the 1988 (Phase I) and 1990 (Phase II) closure plans.

In accordance with the September 14, 1990 Department Order, a hydrogeologic investigation was initiated by GTE Products Corporation to delineate the distribution of contaminants including volatile organic compounds (VOCs) in groundwater across the site. GTE Control Devices, Inc. installed the groundwater recovery and treatment system to address elevated concentrations of constituents in groundwater, with full-scale operation beginning in 1994.

In addition to the former surface impoundment, there were two leach fields consisting of two leach beds each that were used by GTE Products Corporation as part of the plant's sanitary wastewater treatment system. This area is located across the street (Northeast Rd. /Rt. 35) from the manufacturing building and is now referred to as Parcel 2 (see Figure 1). The first leach field was installed in 1967 and was used until 1978 when a new adjacent leach field was installed. The new leach field was used until 1988 when additional holding tanks were installed at the facility to store wastewater. Beginning in 1988, the sewage and gray water were then pumped and hauled from the facility to the Portland POTW.

In the spring of 1992 GTE Control Devices, Inc. purchased a 6.3-acre section of the adjoining property, located down gradient from the former surface impoundment. This property is referred to as Parcel 3. The groundwater under the former farmhouse on Parcel 3 contained the same contaminants found in the former surface impoundment. The local fire department burned the farmhouse for fire training practice.

In late 1989 the DEP requested that GTE Products Corporation conduct soil and groundwater sampling around the former leach fields (Parcel 2). In May of 1991, a work plan was submitted for an investigation of the leach field area. Work was performed during 1991 and 1992 that included installation of several groundwater monitoring wells, soil and sludge sampling, and a soil gas survey. Samples of leach field sludge were collected and soil borings were completed down gradient of each former leach field chamber to determine whether soil quality was impacted by the former use of the leach fields. Groundwater monitoring wells were installed and sampled to determine if the groundwater was impacted by the usage of the former leach fields.

CONTROL DEVICES, INC. AND	5	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

Results of a soil gas survey showed trace levels of VOCs in the leach field area primarily located along the western and southern perimeters, indicating that the nearby portions of the leach field may have contributed low levels of contamination to the subsurface. Soil and sludge analysis of the leach field area showed no VOCs detected. Several monitoring wells in the leach field area showed concentrations of 1, 1-dichloroethane (1,1-DCA), with a maximum concentration of 23 ppb. 1,1-DCA (<30 ppb) was detected in water samples taken from several homeowner wells along Wildbrook Lane and in three monitoring wells located on the GTE Control Devices, Inc. property between the out-of-service leach fields and the Wildbrook Lane area. In 1992, the Maximum Exposure Guideline (MEG) for 1, 1-DCA in drinking water was 5 ppb. Water filters were installed on Wildbrook Lane homes due to the contamination with 1,1-DCA. GTE Control Devices, Inc. petitioned the Department of Human Services (now known as the Center for Disease Control (CDC)) to reevaluate the MEG. In 1995, this reevaluation resulted in a new MEG of 70 ppb for 1, 1-DCA. The MEG for 1, 1-DCA is currently 60 ppb.

GTE Control Devices, Inc. installed a groundwater recovery and treatment system in the former leach field area to address concentrations of 1,1-DCA in groundwater, with full-scale operation beginning in 1995 (the year after the surface impoundment pump and treat system commenced). In June of 1996, GTE Control Devices, Inc. submitted to the DEP a report that outlined the rationale for termination of that pump and treat system down gradient of the former leach field area. The former leach field pump and treat system was permanently shut down on June 30, 1996 with approval from the Department provided the private drinking water wells in the area are reevaluated for the presence of contamination prior to final closure of corrective actions at the site. The reevaluation of private drinking water wells was submitted with this substantial modification application, as described in Section 1.D below, even though corrective measures at the site are not yet complete.

CDI purchased the property in 1994. From approximately 2004 to 2006 two new monitoring wells, located down gradient from the leach field, were sampled by CDI following reactivation of the leach field. The conventional parameters (Cl, NO3-N, alkalinity, conductivity) were consistent with sanitary septic system leachate. The wells were therefore determined to be monitoring the leach field. No VOCs were detected in the wells over the two years of quarterly sampling.

CONTROL DEVICES, INC. AND	6	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

On February 11, 1997 the Post Closure License application (#O-000070-HG-B-N) was returned to the applicant. After a number of communications between the applicant and DEP, the Post Closure License was issued on June 5, 2003 as Board Order #O-000070-HG-C-N. This Post Closure License covered the closed surface impoundment (used by GTE Products Corporation from 1968 to 1982), leach fields, and contaminated ground water. GTEOSI and CDI were jointly issued the 2003 Post Closure License, which is the subject of this modification.

Since the June 5, 2003 Post Closure License was issued, the groundwater recovery and treatment system at the closed surface impoundment has continued treating contaminated groundwater. Groundwater monitoring continued at the site. Over the past eight years the concentrations of 1,1-dichloroethene, trichloroethene, and tetrachloroethene at MW-8SR on Parcel 3 have increased to near pre-remediation levels. These levels exceed the respective drinking water standards for those pollutants. The Department and GTEOSI discussed the increase in contaminant concentrations as well as what actions were appropriate to enhance the capture of contaminated groundwater.

The Department requested a detailed evaluation of plume capture to determine why there was a decrease in pumping rates. To improve capture, repairs to the groundwater recovery flow control system were made in 2011 and 2012, including replacement of variable frequency drives (VFDs), incorporation of a feedback signal from the two VFDs to the control panel to allow the operator to determine in real time if the system is functioning properly, and an update of system operating software. An increase in the extraction flow rate of 1 gallon per minute (from 2.5 gpm to 3.5 gpm) has since been observed. GTEOSI and ME DEP will continue to evaluate the performance of the system.

On July 13, 2007 GTEOSI applied to the Department to modify the reporting submittals that were established in the 2003 Post Closure License #O-000070-HG-C-N. The Department approved this request with license modification #O-000070-HG-D-M.

On December 6, 2007 GTEOSI and CDI applied to renew their 2003 Post Closure License. The 2003 license is still in effect. The Department reviewed the renewal application and will address renewal following completion of the substantial modification that is the subject of this Order.

CONTROL DEVICES, INC. AND	7	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

In 2008, CDI completed hazardous waste generator closure for the manufacturing building in accordance with 06-096 CMR 851(11) after characterizing and remediating the manufacturing building on Parcel 1. This work is summarized in the "Facility Closure Report and Certification, First Technology/Control Devices, Inc., Standish, Maine" that was prepared by EOS Research, Ltd. and dated December 2008. CDI simultaneously completed hazard waste closure for abbreviated license #O-000183-HL-C-R for an aerosol can depressurization unit and a solvent distillation unit.

- D. Summary of Proposal: The applicants propose to complete closure of the Post Closure License on approximately 70 acres of the 82.3 acre site. As stated in the application, the property currently subject to the Post Closure License is comprised of three parcels, Parcel 1, 2, and 3. Parcel 1 contains the decommissioned manufacturing building, undeveloped land north west of the building, and the former surface impoundment area. Parcel 2 is located across Northeast Road/Rt. 35 from the manufacturing building and contains the leach fields and the former wastewater discharge outfall to an intermittent stream. Parcel 3 is on the same side of the street as Parcel 2 but to the south west of Parcel 2 and directly across the street from the former surface impoundment. The manufacturing building on Parcel 1 and leach fields on Parcel 2 will be removed from the Post Closure License (see Figure 2). CDI and GTEOSI will continue to be responsible for compliance with the terms and conditions of the Post Closure License covering the former surface impoundment on a portion of Parcel 1 and the contaminated ground water plume that is currently identified on a portion of Parcel 1 and Parcel 3.

An environmental covenant that conforms with the Uniform Environmental Covenant Act was recorded on February 17, 2012 for all three of the parcels. The environmental covenant requires that access to the property be provided to GTEOSI, CDI and DEP when needed for purposes of monitoring and enforcing this Environmental Covenant, and it provides for access to the Property to conduct activities as may be required related to investigation and remediation of the Restricted Area, including activities as required under the Post Closure License or any similar subsequently-issued license. For any Property that may be transferred by CDI to others, CDI and its successors and assigns shall be provided, without cost, access for purposes of conducting any environmental activities as it may be required by law. On all three parcels, the Environmental Covenant restricts the property to commercial and industrial use and prohibits residential use of the property without the prior approval of the Department, CDI and GTEOSI or its successor in legal function. The environmental covenant also prohibits the alteration of any surface water, groundwater, or the water table (other than naturally occurring) on or under the restricted area as identified in Figure 1 of the

CONTROL DEVICES, INC. AND	8	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

2012 Environmental Covenant, and requires notice of the covenant to tenants, lessees, contractors or other person conducting any activities on the Property that could result in disturbance of soil, groundwater, or surface water, or any activity that could adversely affect the operation or integrity of any groundwater remediation system. The Environmental Covenant also requires the then-current owner of any portion of the property to inspect that portion of the property for compliance with the covenant, and the results are to be reported annually to the DEP.

CDI also proposes to use recent ground water data to satisfy condition #13 in the 2003 Post Closure License. Condition #13 in the 2003 Post Closure License states, "*GTE shall continue to operate the remedial system under the schedule and according to the conditions established within this license to ensure protection of public health and the environment. In the event that corrective measures onsite can be discontinued as per the requirements stated in Section 16M above, CDI must conduct a final round of sampling of active private drinking water wells located within a 1,000 foot radius between the bearings of 35 degrees and 215 degrees, and up gradient of the former leach field within a 500 foot radius between the bearings of 215 degrees and 35 degrees starting at a point in the middle of the southeastern boundary of the leach field, as illustrated in Figure 6. The samples must be analyzed for chlorinated volatiles to confirm continued protection of public health. If such protection is not confirmed, GTE shall within 90 days propose an alternative plan for Department review and approval.*" Based on the results of a private well location survey on May 25, 2012, as well as a March 2011 map titled "Standish Parcels with Private Water Supplies, Standish ME" produced by XDD, LLC, one well was identified that met the location criteria of condition #13. That private well down-gradient from the leach fields was sampled in May 2012. The well, located at 27 Shaws Mill Road, was found to be non-detect for volatile organic compounds using laboratory method USEPA 524.2. Another well nearby was also sampled even though it was outside of the area required to be checked by condition #13. The sample from the private well, located at 31 Shaws Mill Road, was also non-detect for VOCs.

Corrective action obligations for hazardous waste licensees require the identification of solid waste management units (SWMUs), the investigation of these SWMUs, and the removal or remediation of waste or constituents found prior to separating the property. The assessment of site wide corrective actions is required pursuant to the Department's rule for Licensing of Hazardous Waste Facilities, 06-096 CMR, Chapter 856(10)(B)(17). The potential buyer of the property to be subdivided performed environmental sampling. The applicant provided to the Department a Draft Phase II Environmental Site Assessment (Phase II Draft Report), dated August 22, 2012 pursuant to the obligation and the requirements of 06-096 CMR

CONTROL DEVICES, INC. AND	9	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

856(10)(B)(17). The report was prepared for the Greater Portland Council of Government by Community Revitalization, Economic Development, Environmental Remediation and Engineering (CredeRe). This report provided for the assessment of areas on a large portion of Parcel 1 and Parcel 3 where solid and hazardous wastes had been managed. By design, the investigation did not cover the part of the property that CDI plans to retain.

The Phase II Draft Report identified and labeled several areas as Recognized Environmental Conditions (RECs). These areas meet the definition of Areas of Concern (AOC) or Solid Waste Management Units (SWMUs). A SWMU is defined in the Federal Register (Vol. 55, No. 145 30808, July 27, 1990), as "Any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released." Areas of Concern are described in Corrective Action Guidance (July 23, 2004) provided by the Environmental Protection Agency (EPA) as areas "that warrant further investigation or remediation, regardless of whether associated with a SWMU." For the purposes of this Order, all RECs or SWMUs will be referred to with the single term Area of Concern. Any Area of Concern found to have releases of hazardous waste or constituents will require assessment and potentially remediation pursuant to 42 USC 3004(u).

2. DEPARTMENT FINDINGS:

- A. Figure 2 identifies the portion of the property where corrective actions are partially complete with controls; however the survey and legal description have not been completed. Pursuant to 06-096 CMR, Chapter 856(10)(B)(6) a survey and legal description of the subdivided property is required to be submitted to the DEP.
- B. The proposal to subdivide the property that is the subject of a Post Closure License is a substantial modification. Pursuant to 06-096 CMR, Chapter 856(10)(A)(1) and 12(A)(B)(C) a substantial modification requires a draft order that is posted for the purpose of allowing public comment, followed by a final order. As a part of this modification request, CDI requested a determination of condition compliance for that portion of condition #13 of the existing Post Closure License relating to private well testing at this time rather than at the conclusion of remedial measures. As stated, Finding of Fact #1C and Condition #13 in the 2003 Post Closure License requires in part that prior to discontinuance of corrective measures onsite, CDI must conduct a final round of sampling of active private drinking water wells "located within a 1,000 foot radius between the bearings of 35 degrees and 215

CONTROL DEVICES, INC. AND	10	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

degrees, and up gradient of the former leach field within a 500 foot radius between the bearings of 215 degrees and 35 degrees starting at a point in the middle of the southeastern boundary of the leach field.” The samples must be analyzed for chlorinated volatiles to confirm continued protection of public health. The corrective measures at the former surface impoundment are continuing. CDI has confirmed that nearby drinking water supply wells are not negatively impacted from the leach field area. The Department reviewed the private well location survey and the results from the May 2012 sampling of two drinking water wells. The Department accepts the survey and confirms that the wells were appropriately purged, that reporting limits were adequately low (0.5 ug/L for most analytes including both tetrachloroethene (PCE) and 1,1-dichloroethane (1,1-DCA)), and that the samples were analyzed six days after sampling which is within the 14-day holding time limit. The Department finds that the portion of Condition #13 related to private well sampling in the 2003 Post Closure License is now satisfied. GTEOSI will continue to operate the remedial system under the schedule and according to the conditions established in the 2003 Post Closure License.

- C. Pursuant to 06-096 CMR, Chapter 856(5)(F) any person who owns or operates a facility for hazardous waste that is subject to post closure care must obtain a license during the entire post closure care period. If a potential new owner for a portion of this site does not want to be issued a Post Closure License along with the associated liabilities, then that portion of the site must be closed and corrective actions completed. As a licensed hazardous waste facility, the proper management of chemicals and waste is required including the remediation of releases and performing clean closure where possible. To avoid post closure care responsibilities, the facility owner or operator must complete clean closure and remove all waste and materials contaminated by hazardous waste and constituents and demonstrate that any hazardous constituents left onsite will not pose a substantial present or potential threat to human health or the environment. Each Area of Concern identified on the piece of property to be subdivided must be investigated, remediated, and any institutional controls, with operation and maintenance procedures necessary to protect human health and the environment, established. The DRAFT Phase II Environmental Site Assessment dated August 22, 2012 identified eight Areas of Concern or SWMUs on the property to be removed from the Post Closure License as further described in Section D below.
- D. Pursuant to 42 U.S.C 3004(u)(v) and 3005(c)(3), to close a portion of a licensed hazardous waste facility property, site wide corrective action needs to be completed. GTEOSI and CDI submitted with this application the sampling results described in Credere’s “Draft Phase II Environmental Site Assessment, Former Sensata Technologies Property, 228 Northeast

CONTROL DEVICES, INC. AND GTE OPERATIONS SUPPORT INCORPORATED, STANDISH, CUMBERLAND COUNTY, MAINE POST CLOSURE LICENSE MODIFICATION LICENSE #O-000070-HG-F-M APPROVAL WITH CONDITIONS	11))))))))	MAINE HAZARDOUS WASTE SEPTAGE AND SOLID WASTE MANAGEMENT ACT SUBSTANTIAL MODIFICATION AND PARTIAL CORRECTIVE ACTIONS COMPLETE WITH CONTROLS
---	--	---

Road, Standish, ME,” dated August 22, 2012 to satisfy this obligation and 06-096 CMR, Chapter 856(10)(B)(17). A number of these Areas of Concern will require further actions to delineate, remove, or remediate hazardous waste and constituents to fulfill clean closure and the facility wide corrective action obligations of the licensee. These include polychlorinated biphenyls (PCBs) on the concrete floors of the manufacturing building, loose and flaking lead based paint, lead dust on concrete floors and in the duct work, and metals in sediments at the former location for the discharge of wastewaters. These Areas of Concern are described below and are generally located on Figure 2. A review of the data associated with each area is included as attachments to this license. Results above reference standards and not within site specific background values are in bold in the tables, unless otherwise noted.

1. AOC #1: Land Adjacent to the Former Surface Impoundment

This AOC (also known as REC-1) covers the area of land between the contaminated surface impoundment property and the manufacturing building (refer to Figure 2). The Post Closure License will continue to cover the surface impoundment property. The assessment of this area was intended to determine if contamination from the surface impoundment or other sources impacted this portion of the site. Samples of the subsurface soil, groundwater, and soil gas were taken from this area for laboratory analysis.

No significant concentrations of contaminants of concern were identified in soil, groundwater, or soil gas samples focused on evaluating this area on the south west part of the property that is to be sold. A concentration of dissolved arsenic was identified in well CA-MW-01 (43 ug/L) that was above the drinking water guideline (10 ug/L) but no other contaminants of concern were identified in soil or groundwater collected from this location. Nearby private drinking water sources are known to require treatment for elevated arsenic believed to be naturally occurring. No detectible concentrations of dissolved arsenic were identified in four down gradient monitoring wells.

CONTROL DEVICES, INC. AND	12	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

2. AOC #2: Floor Drain System and Deep Dry Bed

This AOC (also known as REC-2) covers the potential discharge location of floor drains from the manufacturing building to a dry well also referred to as the “Deep Dry Bed” (refer to Figure 2). Petroleum products and hazardous substances were stored at various locations in the manufacturing building. Historical records indicate that the Deep Dry Bed may have been in use for approximately one year prior to construction of the surface impoundment. The potential existed for spills and discharges to enter the floor drains and the Deep Dry Bed. The manufacturing building underwent hazardous waste closure in 1988 at which time it was observed that the floor drains were plugged with concrete. Samples of subsurface soil, groundwater, and soil gas were taken for laboratory analysis to assess this AOC.

The Deep Dry Bed was identified on an old plan of the facility during a Phase I assessment of the property. It is unknown what, if any, hazardous constituents were discharged into this dry well. No significant concentrations of contaminants of concern were identified in soil or groundwater samples for this Area of Concern. In addition, no significant contaminants were identified in soil gas samples. Dissolved arsenic in well CA-MW-04 (12 ug/L) was found above the drinking water limit (10 ug/L). However, no other elevated metals concentrations were identified in soil or groundwater samples collected from this location. Nearby private drinking water sources require treatment for elevated arsenic. No detectable concentrations of dissolved arsenic were identified in down gradient wells MW-10SR (sometimes identified as 10 R) or MW-14R. The semi-volatile organic compound (SVOC) 4-methylphenol at a concentration of 5 ug/L was found in CA-MW-04. The drinking water standard for this constituent is 4 ug/L. 4-methylphenol is used in industrial applications as a solvent and disinfectant. No detectable concentrations of any other SVOC or VOC were identified in soil or groundwater at this location, and no detectable concentrations of 4-methylphenol were identified at any other sampling location at the site. According to its Material Safety Data Sheet, 4-methylphenol is expected to biodegrade within four to six days in water under aerobic conditions.

CONTROL DEVICES, INC. AND	13	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

3. AOC #3: Air and Irrigation Water Releases to Surficial Soil

This AOC (also known as REC-3) includes the potential for contamination as a result of a possible discharge from the HVAC system from the manufacturing building. The contaminants of concern include metals and poly-aromatic hydrocarbons (PAHs). The investigation of this area was also intended to delineate the potential for contamination by waste waters used for irrigation purposes on the front lawn of the facility. Maine DEP records indicate that treated process wastewaters and non-contact cooling waters were used to irrigate. Historical records also indicate that a water treatment system malfunction resulted in electroplating sludge being introduced to process water. Surface soil samples were collected for laboratory analysis.

The soil results from this area identified PAHs above unrestricted use health based guidelines and arsenic above unrestricted, park user and worker health based guidelines.

However, the arsenic result is lower than the site specific background value for the site.

The PAHs in surficial soil samples from three sides of the building (including the area of the front lawn) do not exceed human health risk numbers when assessing the risk to human health using a risk calculator developed by the Maine Center for Disease Control that takes into account the organs targeted by the site specific contaminants of concern. The soil sample, CA-SS-01 near the "fluff building" between the manufacturing building and the former surface impoundment exceeds unrestricted use and park user risk for PAHs. PAHs detected in CA-SS-01 do not exceed the outdoor commercial worker or construction worker values.

Because the arsenic level found does not exceed site specific background levels and the PAH concentration does not exceed the restricted use value, and because an environmental covenant restricts future use of the site to commercial and industrial, no further investigation of this AOC is required under this license modification. Soils near the "fluff building" should not be relocated either on or off-site without proper characterization and appropriate handling. The current Environmental Covenant does not contain a restriction on digging on this portion of the property.

CONTROL DEVICES, INC. AND	14	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

4. AOC #4: Sanitary Leach Field and Intermittent Stream

This AOC (also known as REC-4) consists of the leach field across Northeast Road (Route 35) and the adjacent intermittent stream where discharges of waste waters from the manufacturing building were released. The manufacturing building plans indicated some floor drains discharging to a septic tank. VOC contamination of leach fields on Parcel 2 was documented in 1991 and 1992. A groundwater treatment system operated in this area from 1995 to 1996. Prior to 2004, when the leach fields were put back in service, investigations, including a groundwater monitoring well, found no indications of VOC contamination. In 2012, to evaluate the leach field, two groundwater samples collected near the sanitary leach field were analyzed and found to be non-detect for volatile organics and below the drinking water value for lead.

Maine Wastewater Discharge Licenses (and other applicable state and federal permits) for the manufacturing building allowed for the periodic discharge of treated process wastewaters and non-contact cooling waters to an unnamed tributary of the North Branch of the Little River, a class B water body, starting in 1980 and ending in 2008. The license was terminated at the request of the licensee in 2010. Although a license issued in 2001 provided for a discharge of up to 50,000 gallons per day (gpd), the licenses generally allowed for the discharge of up to 25,000 gpd. Three sediment samples from this area were taken for laboratory analysis for the stated purpose of evaluating impacts to human health and biota.

Sediment at three locations was sampled for laboratory analysis to determine the concentrations of metals in the area of the former waste water discharge. One sample was taken upstream of the discharge point, one at the discharge location, and one downstream. The purpose of the upstream sample was to compare these results to the other two locations. Sediments at the location of the former waste water discharge to the intermittent stream showed concentrations of metals that exceed risk based ecological soil screening values. Cadmium, chromium, copper, lead, nickel and zinc exceed the EPA Ecological Soil Screening Levels. Aluminum, barium, beryllium, cadmium, copper, lead, nickel, silver, tin, zinc, and fluoride exceeded the site specific background values for soil. All of the preceding metals are highest at the furthest downstream sample or in one case at

CONTROL DEVICES, INC. AND	15	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

the discharge point, with the exception of lead which is highest in the upstream sample taken nearest to the road.

A waste water discharge license (September 14, 1994) for the facility states "...all the tributaries of the Presumpscot River entering below the outlet of the Sebago Lake are classified as Class B waters. Maine law, 38 M.R.S.A., 465(3) states that Class B water shall be suitable for the designated uses of drinking water supply after treatment; fishing; recreation in and on the water; industrial processes and cooling water supply; hydroelectric power generation, except as prohibited under Title 12, Section 403; navigation; and as habitat for fish and other aquatic life. The habitat shall be characterized as unimpaired. Discharges to Class B waters shall not cause adverse impact to aquatic life in that the receiving waters shall be of sufficient quality to support all aquatic species indigenous to the receiving water without detrimental changes in the resident biological community." Corrective Action Program guidance issued by EPA (August 8, 2009) states that corrective action "must be implemented in a manner that is protective of both human health and the environment including consideration of the ecological pathway." The corrective action program assesses any releases of hazardous waste or hazardous constituents to any environmental media including sediment and the effect on biological species. Further characterization of this area will be required as a part of the corrective actions for this site.

5. AOC #5: Former Hazardous Waste Accumulation Building

This AOC (also known as REC-5) consists of the outbuilding and adjacent area located northwest of the manufacturing building that was used to store hazardous wastes (refer to Figure 2). The hazardous waste accumulation building underwent hazardous waste closure in 1988 which included steam cleaning of the building interior. A shallow soil sample was taken from beneath the asphalt of the parking area immediately outside the hazardous waste accumulation building. Concentrations of total PCBs were detected at 2 mg/kg. This was a split sample. The split of the sample was non-detect for PCBs. No significant concentrations of the remaining contaminants of concern were identified in the soil sample collected to address this AOC except for arsenic. The arsenic value does not exceed the site specific background value.

CONTROL DEVICES, INC. AND	16	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

6. AOC #6: Former 15,000-gallon No. 6 Fuel Oil USTs

This AOC (also known as REC-6) consists of the area where two underground storage tanks were located at the site and were removed in 1991. Maine DEP records indicate a 1986 release of petroleum from piping. One subsurface soil sample was taken for this AOC. No petroleum contamination was identified in the soil analysis for this area.

7. AOC #7: Former Transformer Area

This AOC (also known as REC-7) consists of the transformer pads on the outside of the manufacturing building and the surrounding soil. Concrete samples and surficial soil samples were analyzed for this area.

No significant concentrations of contaminants were identified in soil or concrete samples for this area except for arsenic and one PAH. The arsenic value is lower than the site specific background. The one PAH value over the unrestricted use remedial action guideline was deemed acceptable after use of a risk calculator developed by the Maine Center for Disease Control that takes into account the target organs.

8. AOC #8: Hazardous and/or Contaminated Building Materials

This AOC (also known as REC-8) consists of hazardous and/or contaminated building materials associated with the manufacturing building (refer to Figure 2). The work to assess this AOC was performed in accordance with the corrective action obligations to determine whether any hazardous waste or hazardous constituent discharges were present in the building. This building is also anticipated to be reconfigured and renovated for reuse for a variety of purposes including office space. As the manufacturing building was constructed prior to the 1980's, asbestos, lead-based paints, universal and other hazardous wastes, and PCBs could have been used in construction, and could be present within the building. Previous cleanup efforts were conducted to remove lead- and barium-impacted dust from parts of the building interior and from the roof of the

CONTROL DEVICES, INC. AND	17	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

manufacturing building near HVAC discharge points. Given the need to complete corrective actions on this portion of the Site and because of the proposed changes in use, the sampling of building materials was needed to determine if releases occurred and were present in the building. The results of the investigation are summarized below:

- i. Asbestos: Asbestos was identified in a number of the tile flooring materials as well as the tile mastic. In addition, some of the mastic used for non-asbestos tile contained regulated asbestos levels. Asbestos was also found in mudded pipe fittings and gaskets within the heating ventilation and air conditioning (HVAC) duct system. Asbestos containing materials will need to be managed in accordance with all applicable state and federal regulations at the time of removal.
- ii. Lead-based Paint: The yellow hazard paint located throughout the interior and exterior areas of the building is lead-based. Some of this paint was loose and flaking. Other than a few isolated wooden window sills, the remainder of the paint associated with the building and exterior of the accessory structures was lead-free. Loose and flaking lead-based paint must be removed and managed in accordance with all applicable state and federal regulations.
- iii. PCB Bulk Materials: A window caulking sample collected from between an aluminum window and the adjacent brick molding near the main building entrance contained total PCBs at a concentration of 9,230 mg/kg. PCBs may also have impacted adjacent porous materials (i.e. brick molding). In addition, three samples of wall paint, one window gasket sample, one sample of carpet mastic, and one sample of tile mastic contained PCBs at concentrations ranging from 2.21 to 21.7 mg/kg. The remaining building material samples contained no PCB concentrations above 1 mg/kg. The PCBs found in building materials and identified in the Draft Phase II Environmental Site Assessment prepared by Credere Associates and dated August 22, 2012 must be managed in accordance with the requirements of the Toxic Substances Control Act (TSCA). Waste materials containing PCBs at 50 ppm or greater must also be managed in accordance with the Maine Hazardous Waste Management Rules.

CONTROL DEVICES, INC. AND	18	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

- iv. Wipe Sampling: Two wipe samples collected from HVAC ductwork, one in the machine room and one in a cleanroom in the sensor production area, contained lead at elevated concentrations. Six floor wipe samples from the warehouse, powder plant, machine room, and ceramic area also contained elevated levels of lead. No samples contained elevated levels of barium. Lead dust releases to the interior of the building will be addressed in accordance with this Order.
- v. Concrete Sampling: Three out of the nine concrete samples collected from the interior of the building contained total PCBs in excess of 1 mg/kg (concentrations ranging from 2.6 to 3.7 mg/kg). Since the source is not known, there is a potential for additional PCB contamination. PCB releases to the interior of the manufacturing building will be addressed in accordance with this Order.

9. Site Specific Background Numbers from the Adjacent Undeveloped Area

This area of the Site is the undeveloped area behind the manufacturing building. This area was assessed to determine if the area had been contaminated and to determine if the area could be used as a site specific background location.

Site specific background samples were taken from this area of the site. Samples were collected and analyzed for surficial and subsurface soils and groundwater. No significant concentrations of contaminants (except for naturally occurring elements) were identified in soil or groundwater samples collected from this area, though an elevated concentration of arsenic (56 mg/kg) was identified in background subsurface soil sample CA-SB-08. The arsenic background sample was collected at a depth of 2.5 to 5 feet below ground surface. The analytical results were compared to surficial soil results (which tend naturally to contain less arsenic than deeper soils). It is likely that in the development of the property, the area around the buildings was entirely re-graded so that shallow topsoil was redistributed and subsoil exposed at the surface. The Department finds that it is reasonable to have elevated arsenic in soils from the ground surface to depths of six or eight feet throughout the developed area of the property, so the use of a subsoil sample for background arsenic to compare to surface soil results for arsenic is acceptable in this specific case.

CONTROL DEVICES, INC. AND	19	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

The data from this area was used in this Order to establish a range of site-specific background concentrations for naturally occurring compounds. The Department finds that the cobalt identified in the subsurface soil, although exceeding the established RAG national background level, is likely natural and may be used as a site specific background number. There is no information that the Department is aware of that this portion of the property was utilized for waste handling practices. A review of the data and comparison to the unrestricted soil RAG and the National background value determined that these values are appropriate for use as site-specific background values.

Undeveloped Area

Highest Positive Detections in Surficial Soils

Constituent	Maximum Detection mg/kg	Remedial Action Guideline – unrestricted use mg/kg	National, non Maine, Background Levels from Remedial Action Guidelines mg/kg
aluminum	16,000	34,000	69,000
arsenic	11	0.14	9.0*
barium	49	6,800	740
beryllium	0.5	68	2.0
chromium	21	100 (Cr+6)	---
cobalt	6	10	15
copper	25	480	23
lead	9.6	170	---
nickel	19	100	28
silver	0.5	170	---
zinc	23	(ceiling 10,000)	94

*Site specific background during the surface impound closure was determined as 26 mg/kg.

CONTROL DEVICES, INC. AND	20	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

**Undeveloped Area
Highest Positive Detections in Subsurface Soils**

Constituent	Maximum Detection Mg/kg	Remedial Action Guideline – unrestricted use mg/kg	National, non Maine, Background Levels from Remedial Action Guidelines mg/kg
aluminum	13,000	34,000	69,000
arsenic	56	0.14	9.0
barium	33	6,800	740
beryllium	0.4	68	2.0
chromium	14	100 (Cr+6)	---
cobalt	22	10	15
copper	47	480	23
lead	8.7	170	---
nickel	24	100	28
thallium	0.3	2.7	---
zinc	20	(ceiling 10,000)	94

10. Pursuant to 06-096 CMR Chapter 854, Section 6 (C)(16) a hazardous waste post closure facility is required to demonstrate financial assurance for an amount equal to the annual cost of post closure monitoring and maintenance, multiplied by the required post closure period. Options for financial assurance for post closure care include a trust fund, surety bond, letter of credit, insurance, and a financial test. In addition, liability coverage is required for sudden and accidental occurrences in the amount of one million dollars per occurrence and two million dollars annual aggregate. Liability coverage is required for non-sudden and accidental occurrences in the amount of three million dollars per occurrence and six million dollars annual aggregate. Since 1996 GTEOSI has annually submitted proof of liability coverage in the form of a Certificate of Insurance (COI) that is prepared in accordance with the Federal and State hazardous waste regulations. GTEOSI plans to continue submitting the COI annually until their obligations for post closure care have been fulfilled. GTEOSI also submits this COI as proof of their

CONTROL DEVICES, INC. AND	21	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

post closure insurance, to satisfy financial assurance requirements. CDI has a letter of credit and standby trust fund for CDI's portion of the post closure costs.

11. All other findings of fact, conclusions, and conditions remain as approved in the 2003 Board Order #O-000070-HG-C-N.

BASED on the above FINDINGS, and subject to the CONDITIONS listed below, the Department makes the following CONCLUSIONS pursuant to 38 M.R.S.A. Section 1301 et seq. and 06-096 CMR 850-857 of the Maine Hazardous Waste Management Rules:

1. Facility wide corrective action is required at this property. This requirement includes the identification, investigation, and where possible clean closure of identified releases. Where the hazardous waste or constituents cannot be remediated, ongoing institutional controls are needed to assure compliance and maintenance of measures to be protective of human health and the environment. Corrective actions for portions of the property are complete without controls when the environmental objectives have been met and will continue to be met without additional actions. A corrective action complete with controls designation occurs when investigation and remediation has occurred and performance of required operations and maintenance and monitoring actions and/or compliance with and maintenance of any institutional controls is necessary to assure protection of human health and the environment.
2. A report was submitted pursuant to the Maine Hazardous Waste Management Rules, 06-096 CMR 856(10)(B)(17).
3. The investigation of the portion of the property to be subdivided and removed from the Post Closure License identified eight AOCs (also referred to as RECs). Two AOC's were determined to require additional actions as follows:
 - a. A plan for remediating the PCBs on the floors of the Oil Room and Boiler Room in the manufacturing building (AOC #8/REC #8) which represent a release of hazardous constituents must be submitted to ME DEP for review and approval. The PCBs on the building floor must be delineated and remediated in accordance with condition 3 below.

CONTROL DEVICES, INC. AND	22	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

- b. A plan for remediating lead dust in the duct work of the manufacturing building and on concrete floors (AOC #8/REC #8) which represents a release of hazardous waste constituents must be submitted to ME DEP for review and approval.
 - c. A certification of remediation of the lead based paint which is loose and flaking, which represents a release of hazardous constituents (AOC #8/REC #8) must be submitted to ME DEP.
 - d. The sediments in the intermittent stream (AOC #4/REC #4) where periodic discharges of wastewaters from the manufacturing facility were released represent a potential release of hazardous constituents. A work plan and schedule must be submitted by CDI to ME DEP for review and approval for further investigation.
4. The Post Closure License modification separates the property into two properties, one covered by the Post Closure License, the other to be subject to the additional closure actions that are specified below in this License Approval with Conditions. The approximate boundaries of the properties are identified in Figure 2. The specific property lines and legal description of the property must be provided that defines the boundary between the two properties.

THEREFORE, the Department APPROVES the application of CONTROL DEVICES, INC. and GTE OPERATIONS SUPPORT INCORPORATED to subdivide the property and conduct corrective actions for the property that will be released from the Post Closure License, SUBJECT TO THE FOLLOWING CONDITIONS and all applicable standards and regulations:

1. The Standard Conditions of Approval, a copy of which is attached as Appendix A.
2. By November 15, 2012 CDI must submit to the Department the surveyed plan and the legal description for subdivision as approximated in the map attached to this Order as Figure 2.
3. CDI must submit for the Department's review and approval, a work plan and schedule for delineation and remediation of the PCBs in the flooring of the Boiler Room and Oil Room of the manufacturing building as identified in the Draft Phase II Environmental Site Assessment prepared by Credere Associates and dated August 22, 2012 and as described in this order (AOC #8/REC #8). Remediation may be accomplished by power washing, scarifying, or otherwise remediating stained or affected floors to attain levels of PCBs at or below 1 ppm in accordance with a plan approved by the Department.

CONTROL DEVICES, INC. AND	23	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

4. CDI must submit for the Department's review and approval, a plan and schedule for remediation of the lead contamination on the concrete floors in the warehouse, powder plant, machine room, and ceramics area of the manufacturing building and in the HVAC duct work in the machine room and in the clean room of the sensor production area as identified in the Draft Phase II Environmental Site Assessment prepared by Credere Associates and dated August 22, 2012 and as described in this order (AOC #8/REC #8). Remediation may be accomplished by HEPA vacuuming, wiping, power washing, removal and disposal of impacted components, or other remediation to attain lead levels at or below 40 ug/square foot for floors and at or below 250 ug/square foot for the HVAC system in accordance with a plan approved by the Department.
5. CDI must remediate the loose and flaking lead based paint (AOC #8/REC #8) identified in the Draft Phase II Environmental Site Assessment prepared by Credere Associates and dated August 22, 2012 and submit a certification to the Department signed by a Maine registered professional engineer that certifies that the flaking lead based paint was remediated. By December 31, 2012, CDI must submit a schedule for compliance with this condition.
6. CDI must submit for the Department review and approval, a work plan and schedule for further investigation of the sediment associated with the discharges of wastewaters to the tributary of the North Branch of the Little River identified in the Draft Phase II Environmental Site Assessment prepared by Credere Associates and dated August 22, 2012 as described in this order (AOC #4/REC #4). The plan and schedule shall be implemented as approved by the Department.
7. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

CONTROL DEVICES, INC. AND	24	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

8. With the exception of the portion of Condition #13 that relates to the sampling of private water supplies which has been satisfied, all other Findings of Fact, Conclusions and Conditions remain as approved in Board Order #O-000070-HG-C-N, and are incorporated herein.

DONE AND DATED AT AUGUSTA, MAINE, THIS _____ DAY OF _____, 2013.

BOARD OF ENVIRONMENTAL PROTECTION

By: _____
 ROBERT A. FOLEY, CHAIR

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES.

Date of initial receipt of application 4/25/2012

Date of application acceptance 5/1/2012

Date filed with Board of Environmental Protection

CONTROL DEVICES, INC. AND	25	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

ATTACHMENT 1

AOC #1

Soil Highest Positive Detections

Sample/Constituent	Maximum Detection mg/kg	Remedial Action Guideline- unrestricted use for multiple contaminants mg/kg	Site Specific Background ranges mg/kg
CA-SB-01/ aluminum (Al)	18,000	34,000	4,600 - 16,000
CA-SB-01/arsenic (As)	24*	0.14	9.3 - 56
CA-SB-01/barium (Ba)	29	6800	15 - 49
CA-SB-01/beryllium (Be)	0.7	68	ND - 0.5
CA-SB-02(s)/chromium (Cr)	20	100	5 - 21
CA-SB-02(s)/cobalt (Co)	3	10	ND - 22
CA-SB-01/copper (Cu)	7	480	4 - 47
CA-SB-01/lead (Pb)	31	170	1.9 - 9.6
CA-SB-02(s)/nickel (Ni)	10	100	8 - 24
CA-SB-01/zinc (Zn)	29	480	6 - 23

*Site specific background during the surface impound closure was determined as 26 mg/kg.

Groundwater Highest Positive Detections

Sample/Constituent	Maximum Detection µg/l	Maximum Exposure Guideline µg/l
CA-MW-02(D)/aluminum (Al)	260	7000
CA-MW-01/arsenic (As)	43	10

Soil Gas Positive Detections

Location/Constituent	Maximum Detection µg/m3	VI Guidance Table B-10 µg/m3
CA-SG-1/2-butadone (MEK)	7.73	---
CA-SG-1/acetone	76.52	---
CA-SG-1/benzene	6.32	15.6
CA-SG-1/carbon disulfide	3.17	7300
CA-SG-1/dichlorofluoromethane	270.48	2085.71
CA-SG-1/ethanol	167.24	---
CA-SG-1/ethyl acetate	126.11	---
CA-SG-1/hexane	11.70	---
CA-SG-1/isopropyl alcohol	4.76	---
CA-SG-1/propene	41.82	---
CA-SG-1/toluene	12.57	52,142.86

CONTROL DEVICES, INC. AND	27	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

Soil Gas Highest Positive Detections

Location/Constituent	Maximum Detection µg/m3	VI Guidance Table B-10 µg/m3
CA-SG-2/1,2,4-trimethylbenzene	3.69	---
CA-SG-4/ethyl acetate	µ6.75	µ--
CA-SG-2/m, p xylene	4.99	1042.86
CA-SG-4/propene	6.30	---
CA-SG-4/dichlorofluoromethane	33.67	2085.71
CA-SG-5/ethanol	350.70	---
CA-SG-4/toluene	12.08	52142.86
CA-SG-4/tetrahydrofuran	3.07	---
CA-SG-5/hexane	7.05	---
CA-SG-5/ trichlorofluoromethane	14.39	---
CA-SG-6/2-butadone	10.17	---
CA-SG-2/acetone	93.15	---
CA-SG-6/benzene	9.19	15.6
CA-SG-6/carbon disulfide	3.49	7300
CA-SG-6/isopropyl alcohol	10.53	---

CONTROL DEVICES, INC. AND
GTE OPERATIONS SUPPORT
INCORPORATED, STANDISH,
CUMBERLAND COUNTY, MAINE
POST CLOSURE LICENSE MODIFICATION
LICENSE #O-000070-HG-F-M
APPROVAL WITH CONDITIONS

28 MAINE HAZARDOUS WASTE
) SEPTAGE AND SOLID WASTE
) MANAGEMENT ACT
)
) SUBSTANTIAL MODIFICATION
) AND PARTIAL CORRECTIVE
) ACTIONS COMPLETE WITH
) CONTROLS

AOC #3

Soils Highest Positive Detections

Location/Constituent	Maximum Detection mg/kg	Remedial Action Guideline-unrestricted use for multiple contaminants mg/kg	Remedial Action Guideline (multiple contaminant for construction worker and outdoor commercial worker respectively) mg/kg	Leaching to groundwater mg/kg
CA-SS-01/fluorene	0.07	830	200 2,700	120
CA-SS-01/phenanthrene	1.7	700	470 3,600	97
CA-SS-01/anthracene	0.11	4,300	430 7,800	2400
CA-SS-01/carbazole	0.3	---	---	---
CA-SS-01/fluoranthene	4.3	1,000	10,000 7,300	---
CA-SS-01/pyrene	3.1	750	10,000 5,500	---
CA-SS-01/benzo(a)anthracene	1.2	0.26	43 3.5	---
CA-SS-01/chrysene	2.1	26	4,300 350	---
CA-SS-01/benzo(b)fluoranthene	3	0.26	43 3.5	---
CA-SS-01/benzo(k)fluoranthene	2	2.6	430 35	---
CA-SS-01/benzo(a)pyrene	1.8	0.026	10,000 5,500	---
CA-SS-01/ ideno(1,2,3-cd)pyrene	0.91	0.26	43 3.5	---
CA-SS-01/dibenzo(a,h)anthracene	0.34	0.026	4.3 0.35	---
CA-SS-01/benzo(g,h)perylene	0.82	750	10,000 5,500	---

CONTROL DEVICES, INC. AND	29	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

Soils Highest Positive Detections

Location/Constituent	Maximum Detection mg/kg	Remedial Action Guideline-unrestricted use for multiple contaminants mg/kg	Site Specific Background range mg/kg
CA-SS-01/aluminum	12,000	34,000	4,600 - 16,000
CA-SS-04/antimony	0.4	14	ND
CA-SS-02/arsenic	27*	0.14	9.3 - 56
CA-SS-01/barium	41	6800	15 - 49
CA-SS-03/beryllium (Be)	0.6	68	ND - 0.5
CA-SS-02/chromium	17	100	5 - 21
CA-SS-01/cobalt CA-SS-02	4	10	ND - 22
CA-SS-01/copper	25	480	4 - 47
CA-SS-02/lead	36	170	1.9 - 9.6
CA-SS-01/nickel	10	100	8 - 24
CA-SS-01/silver	1.1	170	ND - 0.5
CA-SS-01/tin	3	---	ND
CA-SS-01/zinc	59	10,000	6 - 23

*Site specific background during the surface impoundment closure was determined as 26 mg/kg.

CONTROL DEVICES, INC. AND
 GTE OPERATIONS SUPPORT
 INCORPORATED, STANDISH,
 CUMBERLAND COUNTY, MAINE
 POST CLOSURE LICENSE MODIFICATION
 LICENSE #O-000070-HG-F-M
 APPROVAL WITH CONDITIONS

30
)
)
)
)
)
)
)

MAINE HAZARDOUS WASTE
 SEPTAGE AND SOLID WASTE
 MANAGEMENT ACT

 SUBSTANTIAL MODIFICATION
 AND PARTIAL CORRECTIVE
 ACTIONS COMPLETE WITH
 CONTROLS

AOC #4

Sediment in the intermittent stream at location of former waste water discharge

Constituent	Upstream mg/kg dry weight (CA-SD-01)	At Discharge Location mg/kg dry weight (CA-SD-02)	Downstream from Discharge Point mg/kg dry weight (CA-SD-03)	EPA Ecological Soil Screening Level (approximate for intermittent streams) mg/kg dry weight P = plant SI = soil invertebrate A = avian M = mammalian	Site Specific Soil Background ranges mg/kg dry weight
Aluminum	12,000	4,100	32,000	-	4,600 - 16,000
Arsenic	10	3.3	29		9.3 - 56 *
Barium	35	17	110	330 = SI 2,000 = M	15 - 49
Beryllium	ND	ND	1.1	40 = SI 21 = M	ND = 0.5
Cadmium	0.8	1.9	0.7	32 = P 140 = SI 0.77 = A 0.36 = M	ND
Chromium	22	8	71	26 = A (Cr3) 43 = M (Cr 3) 130 = M (Cr6)	5 - 21
Cobalt	ND	3	13	13 = P 120 = A 230 = M	ND - 22 *
Copper	27	19	140	70 = P 80 = SI 28 = A 49 = M	4 - 47
Lead	250	21	96	120 = P	1.9 - 9.6

CONTROL DEVICES, INC. AND	31	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

Constituent	Upstream mg/kg dry weight (CA-SD-01)	At Discharge Location mg/kg dry weight (CA-SD-02)	Downstream from Discharge Point mg/kg dry weight (CA-SD-03)	EPA Ecological Soil Screening Level (approximate for intermittent streams) mg/kg dry weight P = plant SI = soil invertebrate A = avian M = mammalian	Site Specific Soil Background ranges mg/kg dry weight
				1,700 = SI 11 = A 56 = M	
Nickel	13	8	39	38 = P 280 = SI 210 = A 130 = M	8 - 24
Silver	ND	ND	1.1	560 = P 4.2 = A 14 = M	ND - 0.5
Tin	13	5	76	-	ND
Zinc	84	57	210	160 = P 120 = SI 46 = A 79 = M	6 - 23
Fluoride	ND	ND	10		ND

Bold values in table are the highest value between upstream, at discharge point and downstream. Bold values in the EPA ECO SSL column are those sediment screening values that are exceeded by one or more of the sediment values.

* Highest value within site specific background values.

Groundwater Highest Positive Detections

Sample/Constituent	Maximum Detection µg/l	MEG µg/l
CA-MW-14R/lead	9.0	10

CONTROL DEVICES, INC. AND	32	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

AOC #5

Soil Positive Detections

Location/Constituent	Maximum Detection Mg/kg	Remedial Action Guideline – unrestricted use, single contaminant mg/kg	Site Specific Background mg/kg
CA-SB-05/aluminum	5600	34,000	4,600 – 16,000
CA-SB-05/arsenic	7.7	0.14	56
CA-SB-05/barium	18	6800	15 - 49
CA-SB-05/beryllium	0.3	68	ND – 0.5
CA-SB-05/chromium	9	100	5 - 21
CA-SB-05/copper	8	480	4 - 47
CA-SB-05/lead	3.9	170	1.9 – 9.6
CA-SB-05/nickel	7	100	8 - 24
CA-SB-05/zinc	12	10,000	6 - 23
CA-SB-05/PCBs	2	2.4	

AOC #6

Soil Detections

Location/Constituent	Maximum Detection mg/kg
CA-SB-06/Extractable Petroleum Hydrocarbon	ND

CONTROL DEVICES, INC. AND	33	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

AOC #7

Positive Detections in Concrete

Location/Constituent	Maximum Detection mg/kg	Toxic Substances Control Act – no restriction or action level mg/kg
CA-CS-02 on concrete/PCB Aroclor 1260	0.2	1 mg/kg

Positive PAH Detections in Soils

Location/Constituent	Maximum Detection Mg/kg	Remedial Action Guideline – unrestricted use mg/kg	Leaching to groundwater mg/kg
CA-SS-03 /phenathrene	0.14	700	97
CA-SS-03 /fluoranthene	0.38	1,000	
CA-SS-03 /pyrene	0.28	750	
CA-SS-03 /benzo(a)anthracene	0.13	0.26	---
CA-SS-03 /chrysene	0.21	26	---
CA-SS-03 /benzo(b)fluoranthene	0.21	0.26	---
CA-SS-03 /benzo(k)fluoranthene	0.19	2.6	---
CA-SS-03 /benzo(a)pyrene	0.16*	0.026	---
CA-SS-03 /indo(1,2,3-cd)pyrene	0.07	0.26	---
CA-SS-03 /benzo(g,h,i)pyrene	0.06	750	---

*Does not exceed risk values with use of the multi contaminant risk calculator

Positive PAH Detections in Soils

Location/Constituent	Maximum Detection Mg/kg	Remedial Action Guideline – unrestricted use mg/kg	Site specific Background mg/kg
CA-SS-03 /aluminum	11,000	34,000	4,600 – 16,000
CA-SS-03 /arsenic	4.3	0.14	9.3 - 56
CA-SS-03 /barium	28	6,800	15 - 49
CA-SS-03 /beryllium	0.6	68	ND – 0.5
CA-SS-03 /chromium	13	100 (Cr+6)	5 -21
CA-SS-03 /copper	6	480	4 - 47

CONTROL DEVICES, INC. AND
 GTE OPERATIONS SUPPORT
 INCORPORATED, STANDISH,
 CUMBERLAND COUNTY, MAINE
 POST CLOSURE LICENSE MODIFICATION
 LICENSE #O-000070-HG-F-M
 APPROVAL WITH CONDITIONS

34
)
)
)
)
)
)
)

MAINE HAZARDOUS WASTE
 SEPTAGE AND SOLID WASTE
 MANAGEMENT ACT

 SUBSTANTIAL MODIFICATION
 AND PARTIAL CORRECTIVE
 ACTIONS COMPLETE WITH
 CONTROLS

CA-SS-03 /lead	15	170	1.9 - 9.6
CA-SS-03 /nickel	8	100	8 - 24
CA-SS-03 /zinc	34	10,000	6 - 23

Positive Extractable Petroleum Hydrocarbon Detections in Soils

Location/Constituent	Maximum Detection Mg/kg	Remedial Action Guideline – unrestricted use mg/kg
CA-SS-03 /fluoranthene	0.4	1,000
CA-SS-03 /pyrene	0.3	750
CA-SS-03 /benzo(a)anthracene	0.1	0.26
CA-SS-03 /chrysene	0.2	26
CA-SS-03 / benzo(b)fluoranthene	0.2	0.26
CA-SS-03 / benzo(k)fluoranthene	0.1	2.6
CA-SS-03 /benzo(a)pyrene	0.2	0.026

CONTROL DEVICES, INC. AND	35	MAINE HAZARDOUS WASTE
GTE OPERATIONS SUPPORT)	SEPTAGE AND SOLID WASTE
INCORPORATED, STANDISH,)	MANAGEMENT ACT
CUMBERLAND COUNTY, MAINE)	
POST CLOSURE LICENSE MODIFICATION)	SUBSTANTIAL MODIFICATION
LICENSE #O-000070-HG-F-M)	AND PARTIAL CORRECTIVE
APPROVAL WITH CONDITIONS)	ACTIONS COMPLETE WITH
)	CONTROLS

AOC #8

Wipe Samples for Lead

Location	Results in $\mu\text{g}/\text{ft}^2$	EPA Floors $\mu\text{g}/\text{ft}^2$	EPA Walls $\mu\text{g}/\text{ft}^2$
Window sill in office area	29	NA	250
Concrete floor in arc spray booth in ceramics area	39	40	NA
Concrete floor in additional arc spray booth in ceramics area	102	40	NA
Concrete floor in ceramics area	267	40	NA
Concrete floor in powder plant area	1,301	40	NA
Additional concrete floor in the powder area	258	40	NA
Concrete floor in warehouse	585	40	NA
HVAC duct in a clean room in the sensor production area	111	NA	250
Floor in the machine room area	297	40	NA
HVAC duct in machine room	23,225	NA	250

Concrete Bulk Samples Exceeding 1 mg/kg

Floor Location/Constituent	Detections over standard mg/Kg	Toxic Substances Control Act – no restriction or action level mg/kg
Receiving area near boiler room/ PCB (arochlor 1254)	2.6	1
Area of former air compressors in the boiler room/ PCB (arochlor 1254)	2.6	1
Adjacent to tank in oil room/ PCB (arochlor 1254)	3.7	1

Former GTE Facility
Standish, ME

Figure 1



PROPERTY BOUNDARY

Map Note: Data taken from MEDES
has been overlaid and adjusted
to match the accuracy of the 5 minute
and 15 minute USGS maps. The
color data layer with an accuracy
of 30' is shown in purple to NAD 1983
UTM Zone 18.
Aerial imagery data specific to Maine DEP
is shown in yellow. The yellow
background, green/red and blue
backgrounds are the 5 minute
USGS maps. The 15 minute
USGS map is to be used for reference
and not for site specific
information. (unless otherwise
indicated).

Map Prepared by: Chris Hissard
MDEP GIS Unit, 10/17/12

0 100 200 300
Feet





Site specific background numbers

AOC 5

AOC 7

AOC 6

AOC 8

AOC 3

AOC 4

AOC 1

AOC 2

MAYBERRY SUBDIVISION

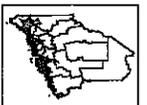
Former GTE Facility Standish, ME

Figure 2



DEPARTMENT OF ENVIRONMENTAL PROTECTION
 SUBMISSION LINE
 PROPERTY BOUNDARY

Map Notes:
 1) Property line taken from MECSB data, 1990, and other 4-5 meters.
 2) Background hydrologic topographic data from the Maine Department of Environmental Protection, 1990.
 3) All data is provided to MAO 1883.
 4) All spatial data sent to Maine DEP.
 5) This map is to be used for reference purposes only and does not represent any official position of the Maine Department of Environmental Protection.
 Map Prepared by: Chris Veselka
 Date: 07/20/01, 11/12



0 100 200 300
 Feet

