

February 4, 2015

Mr. Jim Coffin
E.S. Coffin Engineering and Surveying, Inc.
P.O. Box 4687, 432 Cony Road
Augusta, Maine 04330

RE: BADJ PROPERTIES, LLC DEVELOPMENT ON LIPMAN ROAD IN AUGUSTA

Mr. Coffin:

CES, Inc. (CES) has reviewed the Proposed Site Plan dated January 9, 2015 and Aquifer Map that you provided to us. A portion of the proposed development is located over a mapped Significant Sand and Gravel Aquifer. The City of Augusta has requested an evaluation of potential impacts to the underlying aquifer resulting from planned activities at the Site. Based on discussions with you, we understand the following activities are proposed at the Site:

- ◆ Site operations will include delivery of scrap metal to the Site and subsequent loading of scrap metal onto rail cars for transport to recycling/reuse markets. Other than normal consolidation/compaction during unloading and loading operations, no processing (such as shredding) of scrap metal will occur.
- ◆ Unloading of scrap metal brought to the Site will occur on a concrete pad. Loading of scrap metal from the concrete pad onto rail cars will be performed with a crane. Stormwater contacting scrap metal will be conveyed to a 1,500 gallon oil/water separator prior to discharge.
- ◆ No permanent fuel storage is planned at the Site. Refueling of the crane and any associated equipment will occur via a mobile fueling operation. Fueling operations will take place on the concrete pad.
- ◆ Routine equipment maintenance supplies such as grease, oil, hydraulic fluid, etc. will be stored in a secure enclosed area and protected from direct exposure to stormwater.
- ◆ The operator has established procedures for inspecting scrap metal (vehicles) to verify that all fluids have been drained prior to arrival at the site.
- ◆ A small septic system is proposed for use by on-site employees. The system will be designed in accordance with State of Maine Subsurface Wastewater Disposal System Rules. Although the septic system is not expected to pose a significant risk to the aquifer, it appears to be located outside of the mapped aquifer boundary.

Based on the planned activities, no significant contamination sources will be present at the Site and potential risk to the underlying aquifer appears to be minimal.

We recommend the following actions to minimize future risks:

- ◆ Complete routine quarterly inspections of the oil water separator and remove accumulated oil or grease (if any).
- ◆ Maintain a spill response kit on the Site that can be used to respond to any unexpected

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- leaks or spills from on-site equipment.
- ♦ Surplus scrap metal should be stored on the proposed concrete pad or an area where stormwater contacting scrap metal can be collected and routed through the oil water separator.
 - ♦ Periodically clean the concrete pad surface to minimize buildup of fines that may accumulate. Fines should be disposed of off-site.
 - ♦ Provide training to on-site employees related to inspection of incoming scrap metal to identify unacceptable materials in loads such as liquids, unknown solid waste, foreign debris (soil, trash, etc.) and a means of segregating unacceptable waste on the concrete pad for off-site disposal.
 - ♦ Complete inspections of stormwater structures and discharges in accordance with the Site's Stormwater Pollution Prevention Plan (SWPPP). Special emphasis should be placed on the discharge location for the oil/water separator for the presence of sheens or discoloration. Any deficiencies should be promptly addressed.

Provided these measures are adhered to, the risk to the underlying aquifer is considered to be minimal.

If you have any questions concerning this letter, please contact me.

Sincerely,
CES, INC.

A handwritten signature in black ink that reads 'Michael Deyling'.

Michael Deyling, CG
Senior Project Geologist

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