

**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

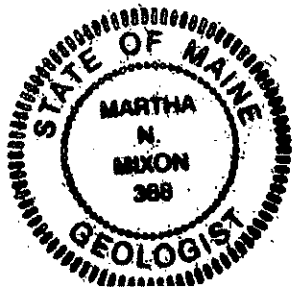
Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

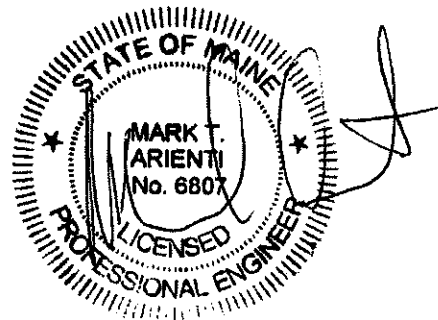
Acadia Environmental Technology
48 Free Street
Portland, Maine 04101

April 14, 2008

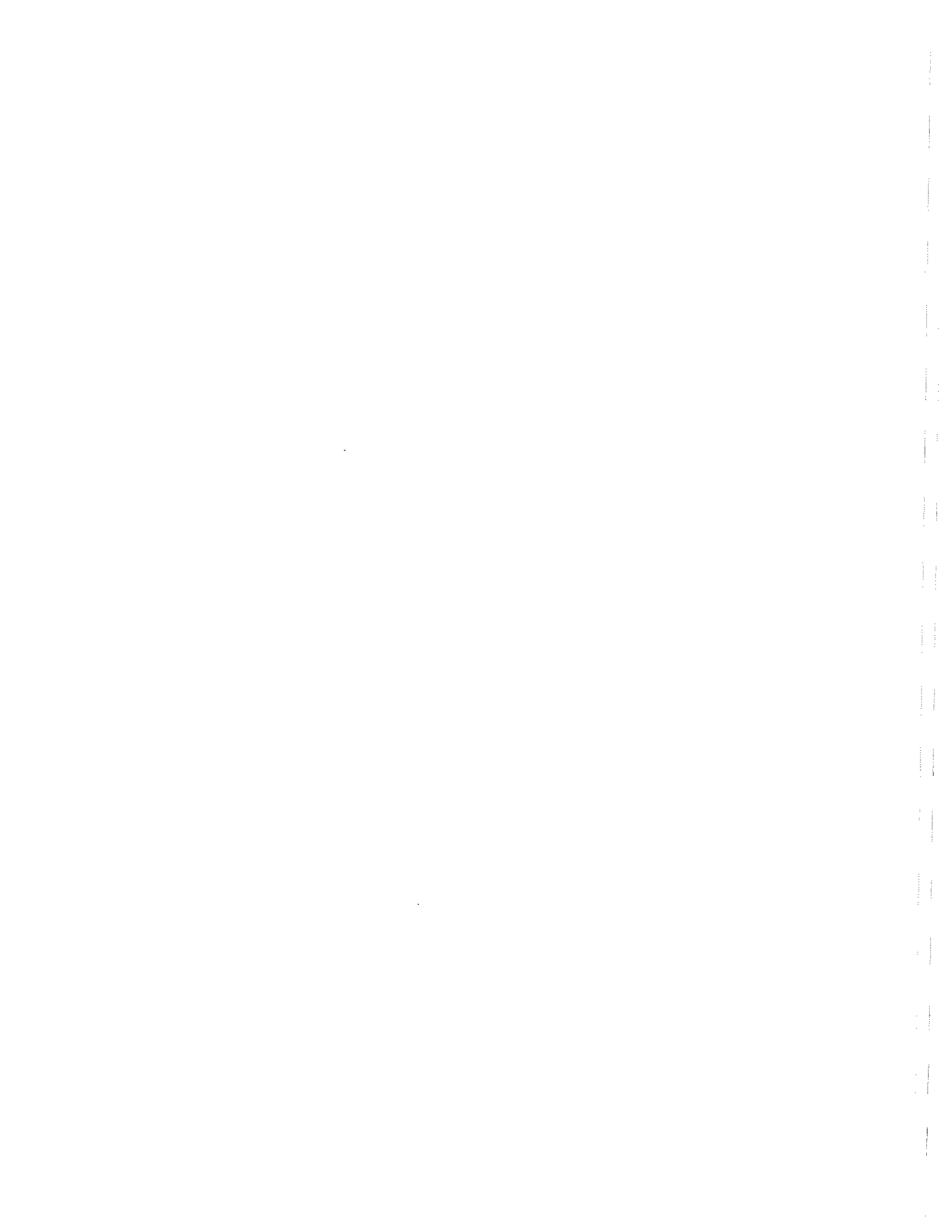


Martha N. Nixon

Martha N. Nixon
Senior Geologist



Mark T. Arienti
Senior Environmental Engineer



April 14, 2008

Rick Knowland, Senior Planner
Planning & Development Department
City of Portland
389 Congress Street
Portland, Maine 04101

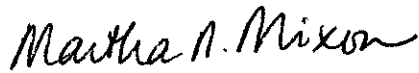
Re: Scrap Metal Recycling Facilities Permit Application
E. Perry Iron & Metal Co.
Portland, Maine

Dear Mr. Knowland:

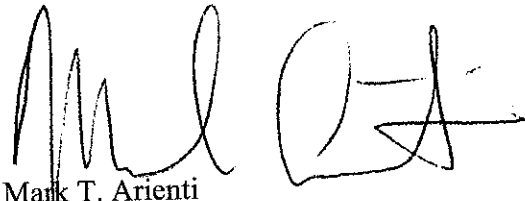
Acadia Environmental Technology (Acadia) has prepared the enclosed application and supporting documentation for a license to operate a scrap metal recycling facility for the E. Perry Iron & Metal Co. Enclosed are 20 copies of the application and attachments, as requested on the application form.

Please do not hesitate to contact us if you need clarification on any of the application materials. We look forward to discussing the application with you.

Sincerely,



Martha N. Nixon
Senior Geologist



Mark T. Arienti
Senior Environmental Engineer

Encl.



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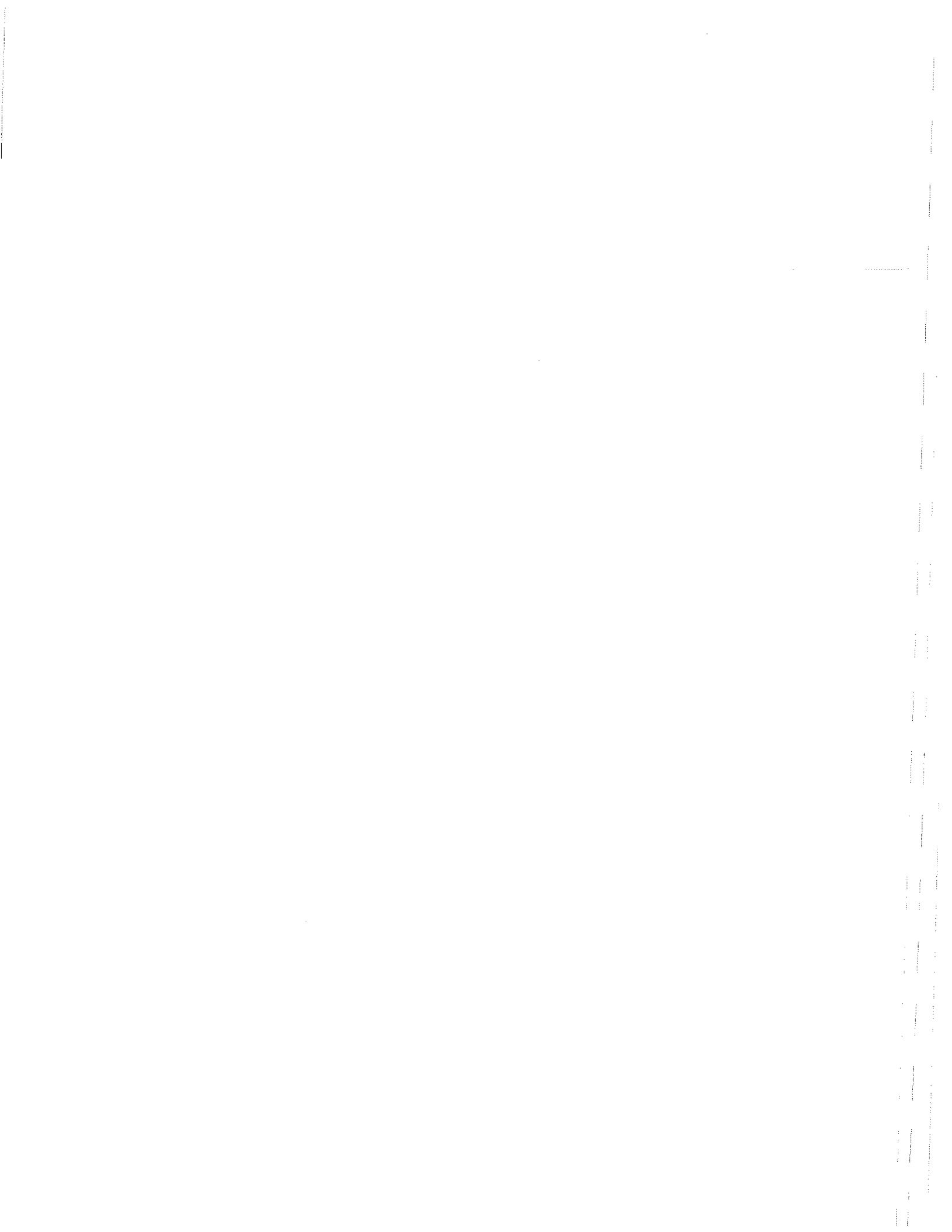
Waste Audit Report

Attachment G

Operations Manual

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Application Form

Scrap Metal Recycling Facilities Permit Application
E. Perry Iron & Metal Co.
Portland, Maine

Planning _____
PPD _____
Zone _____
Taxes _____
Fire _____

City Clerk's Office
389 Congress Street
Portland, Maine 04101
(207)-874-8557

License fee: \$500.00 plus costs
Fee After October 1: \$1500.00
Application fee: \$30.00 new \$20.00 renewal
Total Due: _____
License Expires 12/31 _____

SCRAP METAL RECYCLING FACILITIES PERMIT APPLICATION
CHAPTER 31, PORTLAND CITY CODE §31-1 et. seq.

Please check one: (Corporation/ LLC/ Non-profit org.) (Sole Proprietor) (Partnership)

Property Owner's Name: E. Perry Iron & Metal Co., Inc.; Alan Lerman Phone: 775-3181

Property Owner's Address: 115 Lancaster Street, Portland, Maine Zip 04101
*If the property is owned by more than one entity please supplement above information on an additional sheet of paper.

See Attachment A
for parcels and
ownership.

Business Name: E. Perry Iron & Metal Co., Inc. Phone: 775-3181

Location Address: 115 Lancaster Street, Portland, Maine Zip 04101

Mailing Address: same Zip _____

Contact Person: Alan Lerman Phone: 775-3181

Manager of Business Alan Lerman Home Phone # 775-3040

Does the issuance of this license benefit any City employee? Yes No
If yes, please list name(s) of employee(s) and City Department(s): _____

Have applicant, partners, associates, or corporate officers ever been arrested, indicted, convicted or court martialled for any violation of law? No Yes, please explain: _____

Have any of the applicants, including the corporation if applicable, ever held a business license with the City of Portland?
 Yes No. If yes, please list business name(s) and location(s): _____

Is any principal officer under the age of 18? Yes No

Please list items or general type of items for sale, if any: scrap metal

SOLE PROPRIETOR / PARTNERSHIP INFORMATION: (if corporation, leave blank)

Name of Owner(s): _____ Date of Birth _____ Residence Zip Code _____
Name of Owner(s): _____ Date of Birth _____ Residence Zip Code _____
Name of Owner(s): _____ Date of Birth _____ Residence Zip Code _____

CORPORATE / LLC / NON-PROFIT ORGANIZATION APPLICANTS: (if sole proprietor, leave blank)

Corporation Name: E. Perry Iron & Metal Co., Inc.

Corporation Mailing Address: 115 Lancaster Street, Portland, Maine ZIP 04103

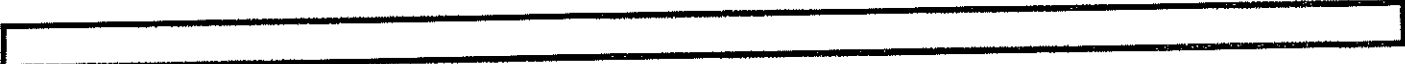
Contact Person: Alan Lerman Phone Number: 775-3181

Application Form

Scrap Metal Recycling Facilities Permit Application
E. Perry Iron & Metal Co.
Portland, Maine

PRINCIPAL OFFICERS: (if more space is needed, please attach a separate page)

Name	<u>Alan Lerman</u>	Title	<u>President</u>	Date of Birth	<u>07/03/1949</u>	Residence Zip Code	<u>04102</u>
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____



Please provide the following information and check all items for which information has been submitted. **20 COPIES MUST BE SUBMITTED WITH THIS APPLICATION FOR DISTRIBUTION TO CITY DEPARTMENTS.** Incomplete packets will not be accepted.

See Checklist and Attachments B through H for documentation of the following items.

- The maximum storage height of any piles of metal or other material.
- A map of the location of any areas on the site used for processing, preparing or storage of materials.
- A map of the location of any sand and/or gravel aquifer and/or any sand and gravel aquifer recharge area as described on the Maine Geological Survey significant aquifer map for the Portland West Quadrangle (GSM Map No. 99-11) or as mapped by a State of Maine certified geologist or other competent professional.
- A map of the location of any residences, schools, public parks, public playgrounds, public bathing beaches, churches, or cemeteries within 500 feet of the area where metal and/or materials will be stored or processed.
- A map of the boundaries of the 100-year floodplain.
- A map of any sand or gravel aquifer on or adjacent to the site as mapped by the Maine Geological Survey or by a licensed geologist.
- A map of any waterbody, watercourse or wetland on or within 300 feet of the site.
- A site plan that complies with chapter 14, section 525(b) as files for approval by the Portland Planning Department/Board.
 **Please note date of site plan submission at Planning Office, 4th floor, City Hall: April 14, 2008
- Results and data from on-site and off-site soil sampling and testing, which testing complies with the Rules attached hereto.
- Results and data from on-site and off-site groundwater sampling and testing, which testing complies with the Rules attached hereto.
- A depiction of any and all screening of the site.
- _____ *Other information.*

- 1. The types of metal processed on the site.
- 2. The types of waste handled and the average volume per year per material.
- 3. A description of the protocol for handling waste and the destination to which that waste is sent.
- 4. An operations manual as described in chapter 402 of the Maine Department of Environmental Protection regulations.
- 5. Operational records as described in chapter 402 of the Maine Department of Environmental Protection regulations.
- 6. An annual report as described in chapter 402 of the Maine Department of Environmental Protection regulations.

Renewal Application

If this is a renewal application, please provide evidence of annual testing completed according to the Rules attached to this application.

Applicant, by signature below, agrees to abide by all laws, orders, ordinances, rules and regulations governing the above license and further agrees that any misstatement of material fact may result in refusal of license or revocation if one has been granted. Applicant agrees that all taxes and accounts pertaining to the premises, or otherwise owed to the City by the Applicant, will be paid prior to issuance of the license. It is understood that this and any application(s) shall become public record and the applicant(s) hereby waive(s) any rights to privacy with respect thereto. I/We, hereby waive any rights to privacy with respect thereto.

Signature *[Signature]* Title *Pres* Date *4-14-08*

PRINCIPAL OFFICERS: (if more space is needed, please attach a separate page)

Name	Alan Lerman	Title	President	Date of Birth	07/03/1949	Residence Zip Code	04102
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____
Name	_____	Title	_____	Date of Birth	_____	Residence Zip Code	_____

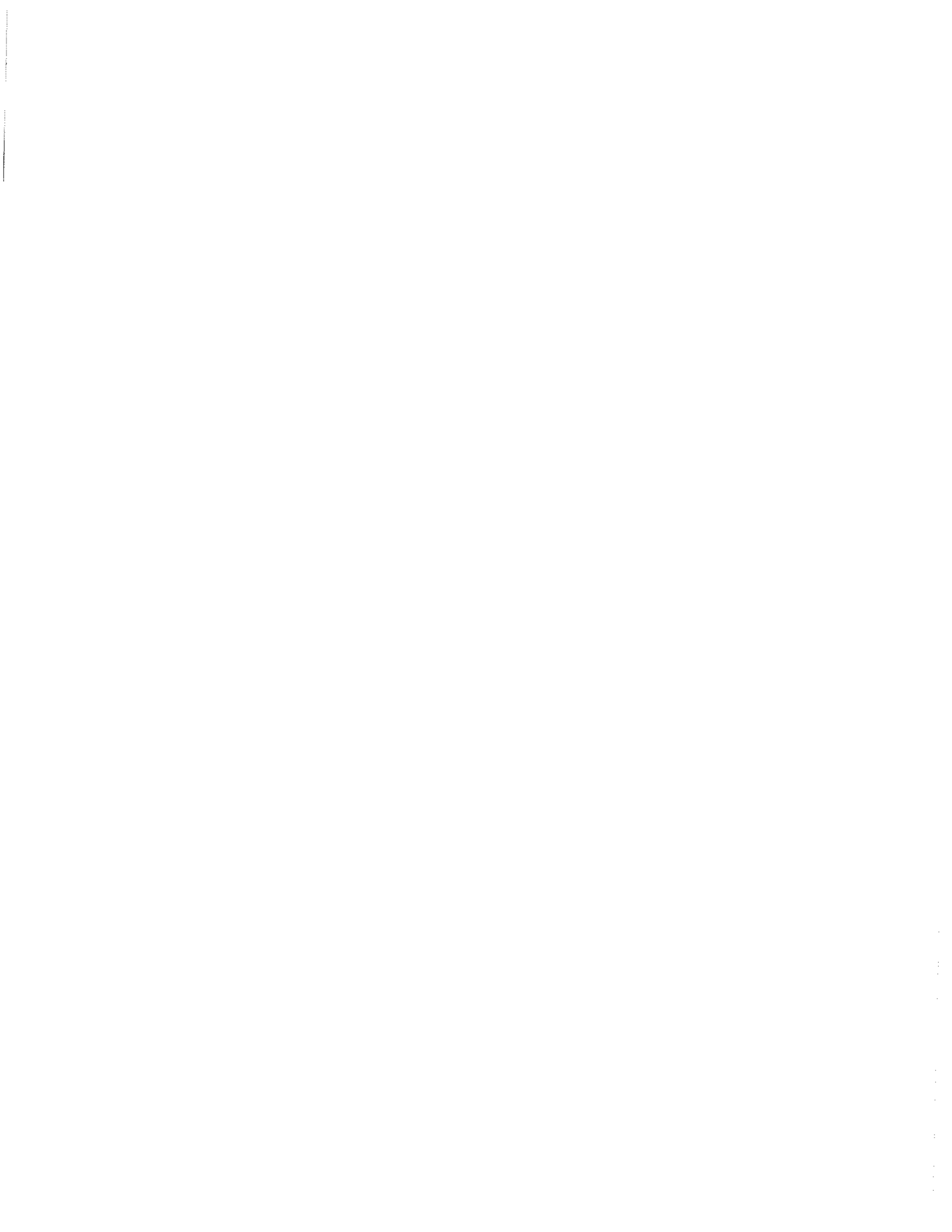
Please provide the following information and check all items for which information has been submitted. **20 COPIES MUST BE SUBMITTED WITH THIS APPLICATION FOR DISTRIBUTION TO CITY DEPARTMENTS. Incomplete packets will not be accepted.**

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- The maximum storage height of any piles of metal or other material.
- A map of the location of any areas on the site used for processing, preparing or storage of materials.
- A map of the location of any sand and/or gravel aquifer and/or any sand and gravel aquifer recharge area as described on the Maine Geological Survey significant aquifer map for the Portland West Quadrangle (GSM Map No. 99-11) or as mapped by a State of Maine certified geologist or other competent professional.
- A map of the location of any residences, schools, public parks, public playgrounds, public bathing beaches, churches, or cemeteries within 500 feet of the area where metal and/or materials will be stored or processed.
- A map of the boundaries of the 100-year floodplain.
- A map of any sand or gravel aquifer on or adjacent to the site as mapped by the Maine Geological Survey or by a licensed geologist.
- A map of any waterbody, watercourse or wetland on or within 300 feet of the site.
- A site plan that complies with chapter 14, section 525(b) as files for approval by the Portland Planning Department/Board.
 **Please note date of site plan submission at Planning Office, 4th floor, City Hall: April 14, 2008.
- Results and data from on-site and off-site soil sampling and testing, which testing complies with the Rules attached hereto.
- Results and data from on-site and off-site groundwater sampling and testing, which testing complies with the Rules attached hereto.
- A depiction of any and all screening of the site.
- Other information.

Checklist

Scrap Metal Recycling Facilities Permit Application
E. Perry Iron & Metal Co.
Portland, Maine



E. Perry Iron Metal Co.
Scrap Metal Recycling Facilities Permit Application
Information Checklist

Attachment Figure

- | Item | | Attachment | Figure |
|---|--|------------|--------|
| <input checked="" type="checkbox"/> The maximum storage height of any piles of metal or other material | Pile heights vary daily but do not exceed 30 feet. | | |
| <input checked="" type="checkbox"/> A map of the location of any areas on the site used for processing, preparing or storage of materials. | The processing, preparing and storage areas are shown on Figure 1, Site Plan, E. Perry Iron & Metal Co., Inc. in Attachment B. | B | 1 |
| <input checked="" type="checkbox"/> A map of the location of any sand and/or gravel aquifer and/or any sand and gravel aquifer recharge area as described on the Maine Geological Survey significant aquifer map for the Portland West Quadrangle (MGS Map No. 99-11) or as mapped by a State of Maine certified geologist or other competent professional. | No sand and gravel aquifers have been mapped at the site or in the site vicinity, according to Significant Sand and Gravel Aquifers, Portland West Quadrangle, Maine, Open File No. 99-11, 1999, published by the Maine Geological Survey. | | |
| <input checked="" type="checkbox"/> A map of the location of any residences, schools, public parks, public playgrounds, public bathing beaches, churches, or cemeteries within 500 feet of the area where metal and/or materials will be stored or processed. | Portions of Tax Maps 24, 25, 26, 33, and 442 are within 500 feet of one or both properties (Lancaster Street and Somerset Street). Residences are present on Tax Maps 26 and 33 within 500 feet of the Lancaster Street Property. The residential areas are shown on Figures 2 and 3 in Attachment B. A playground is also present on Tax Map 26 within 500 feet of the Lancaster Street property, and is indicated on Figure 2. A lot facing E. Perry Iron & Metal Co. on Lancaster Street is currently vacant, however a sign indicates the planned construction of Pearl Place Apartments. | B | 2, 3 |
| <input checked="" type="checkbox"/> A map of the boundaries of the 100-year floodplain. | The boundaries of the 100-year flood are shown on the attached Federal Emergency Management Agency Flood Insurance Rate Map (FIRM). The Lancaster and Somerset Street properties are outside of the 100-year flood zones. They are in Zone C, areas of minimal flooding. The FIRM is attached as Figure 4. | B | 4 |

Checklist

Scrap Metal Recycling Facilities Permit Application
E. Perry Iron & Metal Co.
Portland, Maine

E. Perry Iron Metal Co.
Scrap Metal Recycling Facilities Permit Application
Information Checklist

Attachment Figure

Item

 A map of any sand or gravel aquifer on or adjacent to the site as mapped by the Maine Geological Survey or by a licensed geologist.

No sand and gravel aquifers have been mapped at the site or in the site vicinity, according to Significant Sand and Gravel Aquifers, Portland West Quadrangle, Maine, Open File No. 99-11, 1999, published by the Maine Geological Survey.

 x A map of any water body, watercourse or wetland on or within 300 feet of the site.

No water body, watercourse or wetland is mapped within 300 feet of the site, according to the USGS topographic map of the Portland West 7.5 Minute Quadrangle (attached as Figure 5) and the US Fish and Wildlife Services online digital data.

B 5

 x A site plan that complies with chapter 14, section 525(b) as files for approval by the Portland Planning Department/Board.

****Please note date of site plan submission at Planning Office, 4th floor, City Hall: April 14, 2008**

See Figure 1, Site Plan in Attachment B.

B 1

 x Results and data from on-site and off-site soil sampling and testing, which testing complies with the Rules attached hereto.

A report titled E. Perry Iron Phase II Site Assessment Report, Portland, Maine, dated July 8, 2005, prepared for the Maine Department of Environmental Protection as a Brownfields Site Assessment, by agreement with the City of Portland, contains the baseline environmental testing for soil required by Chapter 31 of the Portland City Code and rules. Summary tables of soil analyses from that report are in Attachment C.

C

 x Results and data from on-site and off-site groundwater sampling and testing, which testing complies with the Rules attached hereto.

A report titled E. Perry Iron Phase II Site Assessment Report, Portland, Maine, dated July 8, 2005, prepared for the Maine Department of Environmental Protection as a Brownfields Site Assessment, by agreement with the City of Portland, contains the baseline environmental testing for groundwater required by Chapter 31 of the Portland City Code and rules. Summary tables of groundwater analyses from that report are in Attachment C. Additional groundwater monitoring is planned. The results will be submitted as an addendum to this application.

C

E. Perry Iron Metal Co.
Scrap Metal Recycling Facilities Permit Application
Information Checklist

Item	Attachment	Figure
<p><input checked="" type="checkbox"/> A depiction of any and all screening of the site.</p> <p style="padding-left: 40px;">Photographs are supplied in Attachment D.</p>		D
Other information.		
<p><input checked="" type="checkbox"/> The types of metal processed on the site.</p> <p style="padding-left: 40px;">This information is in Attachments E and F.</p>		E, F
<p><input checked="" type="checkbox"/> The types of waste handled and the average volume per year per material.</p> <p style="padding-left: 40px;">All of the scrap metal that customers send to E. Perry is consolidated and baled and/or placed in containers to be sent to the secondary metals market. Information on the type and amount of these metals is presented in the above checklist item (Attachment E). The only waste streams that E. Perry generates are rubbish such as office waste, paper and plastic packaging etc. (approx. 10 yards/week), non-metal yard sweepings; waste oil (a couple drums/yr. which is picked up by a nearby business for use in their waste oil heater); and a small amount of Universal Waste consisting of used fluorescent lamps. E. Perry does not receive any of these waste materials from its customers. The Waste Audit report included in Attachment F provides additional information on waste generation at E. Perry.</p>		F
<p><input checked="" type="checkbox"/> A description of the protocol for handling waste and the destination to which that waste is sent.</p> <p style="padding-left: 40px;">Waste handling protocols and destinations are included in the Operations Manual, Attachment G.</p>		G
<p><input checked="" type="checkbox"/> An operations manual as described in chapter 402 of the Maine Department of Environmental Protection regulations.</p> <p style="padding-left: 40px;">The Operations manual for E. Perry is included as Attachment G.</p>		G
<p><input checked="" type="checkbox"/> Operational records as described in chapter 402 of the Maine Department of Environmental Protection regulations.</p> <p style="padding-left: 40px;">Operational records for E. Perry are included as Attachment E.</p>		E
<p><input type="checkbox"/> An annual report as described in chapter 402 of the Maine Department of Environmental Protection regulations.</p> <p style="padding-left: 40px;">The annual report for E. Perry is included as Attachment H.</p>		H

E. Perry Iron Metal Co.
Scrap Metal Recycling Facilities Permit Application
Information Checklist

Item	Attachment	Figure
<p><u> </u> A map of any sand or gravel aquifer on or adjacent to the site as mapped by the Maine Geological Survey or by a licensed geologist.</p> <p style="padding-left: 40px;">No sand and gravel aquifers have been mapped at the site or in the site vicinity, according to Significant Sand and Gravel Aquifers, Portland West Quadrangle, Maine, Open File No. 99-11, 1999, published by the Maine Geological Survey.</p>		
<p><u> x </u> A map of any water body, watercourse or wetland on or within 300 feet of the site.</p> <p style="padding-left: 40px;">No water body, watercourse or wetland is mapped within 300 feet of the site, according to the USGS topographic map of the Portland West 7.5 Minute Quadrangle (attached as Figure 5) and the US Fish and Wildlife Services online digital data.</p>	B	5
<p><u> x </u> A site plan that complies with chapter 14, section 525(b) as files for approval by the Portland Planning Department/Board.</p> <p style="padding-left: 40px;">**Please note date of site plan submission at Planning Office, 4" floor, City Hall: April 14, 2008</p> <p style="padding-left: 40px;">See Figure 1, Site Plan in Attachment B.</p>	B	1
<p><u> x </u> Results and data from on-site and off-site soil sampling and testing, which testing complies with the Rules attached hereto.</p> <p style="padding-left: 40px;">A report titled E. Perry Iron Phase II Site Assessment Report, Portland, Maine, dated July 8, 2005, prepared for the Maine Department of Environmental Protection as a Brownfields Site Assessment, by agreement with the City of Portland, contains the baseline environmental testing for soil required by Chapter 31 of the Portland City Code and rules. Summary tables of soil analyses from that report are in Attachment C.</p>	C	
<p><u> x </u> Results and data from on-site and off-site groundwater sampling and testing , which testing complies with the Rules attached hereto.</p> <p style="padding-left: 40px;">A report titled E. Perry Iron Phase II Site Assessment Report, Portland, Maine, dated July 8, 2005, prepared for the Maine Department of Environmental Protection as a Brownfields Site Assessment, by agreement with the City of Portland, contains the baseline environmental testing for groundwater required by Chapter 31 of the Portland City Code and rules. Summary tables of groundwater analyses from that report are in Attachment C. Additional groundwater monitoring is planned. The results will be submitted as an addendum to this application.</p>	C	

Attachment A: Parcels and Ownership Documentation

**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



E. Perry Iron Metal Co.
Scrap Metal Recycling Facilities Permit Application

Map	Lot	Property Address	Owner	Owner's Address	Book/Page
25	D002001	115 Lancaster Street	Alan Lerman	399 Ludlow St., Portland, 04102	13545/181
25	D005001	42-44 Kennebec Street	E. Perry Iron & Metal Co.	115 Lancaster Street, Portland, 04101	12604/268
25	D006001	131 Lancaster Street	E. Perry Iron & Metal Co.	115 Lancaster Street, Portland, 04101	12604/268
25	D007001	137 Lancaster Street	E. Perry Iron & Metal Co.	115 Lancaster Street, Portland, 04101	12604/268
25	D008001	145 Lancaster Street	E. Perry Iron & Metal Co.	115 Lancaster Street, Portland, 04101	12604/268
24	C024001	9 Somerset Street	E. Perry Iron & Metal Co.	115 Lancaster Street, Portland, 04101	11839/192



Attachment B: Figures

**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

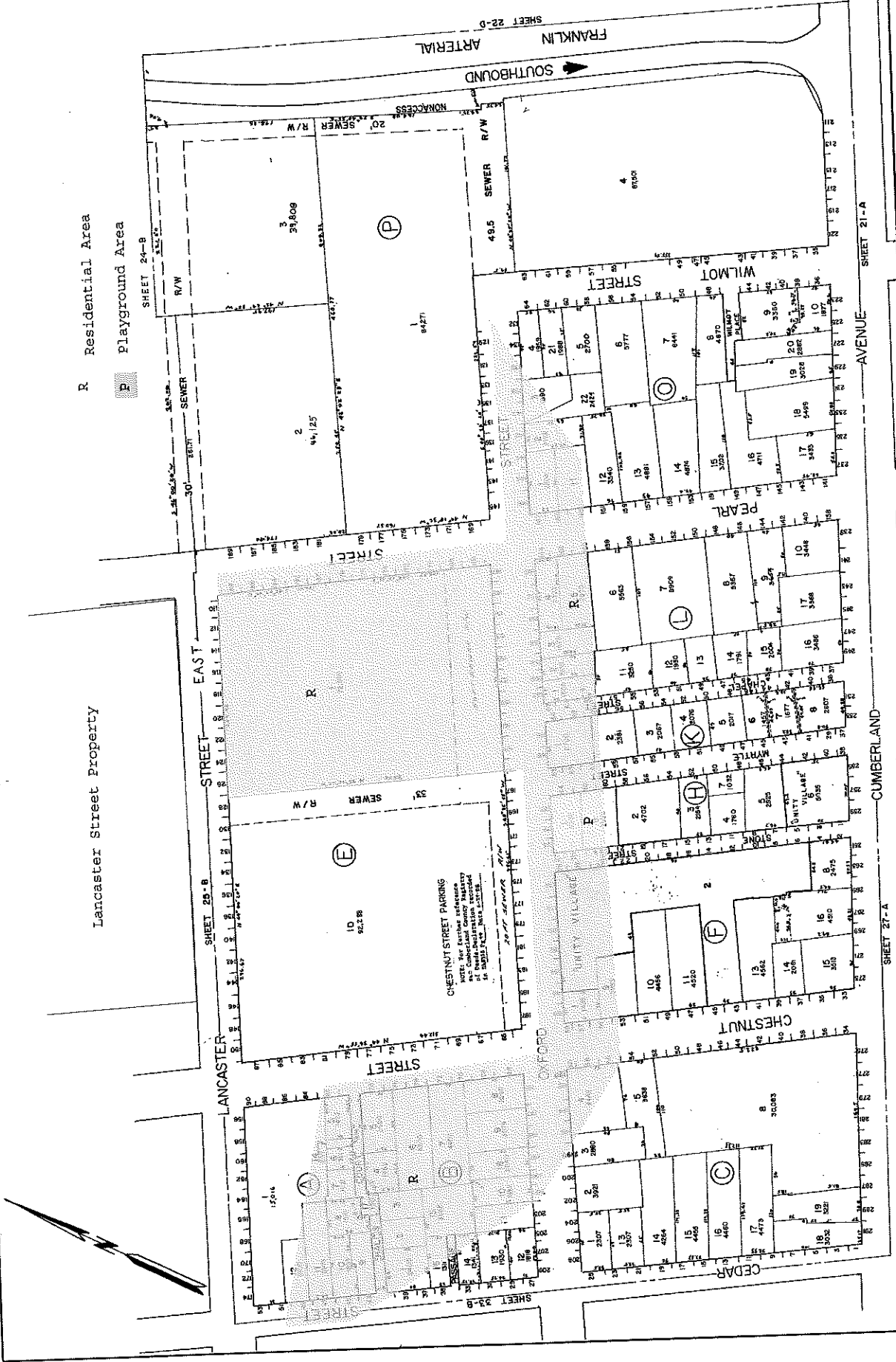
Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



R Residential Area
P Playground Area

Figure 2 -
Tax Map 26

CITY OF PORTLAND
ASSESSORS PLAN
SCALE = 1" = 50'
REVISED 4/1/79

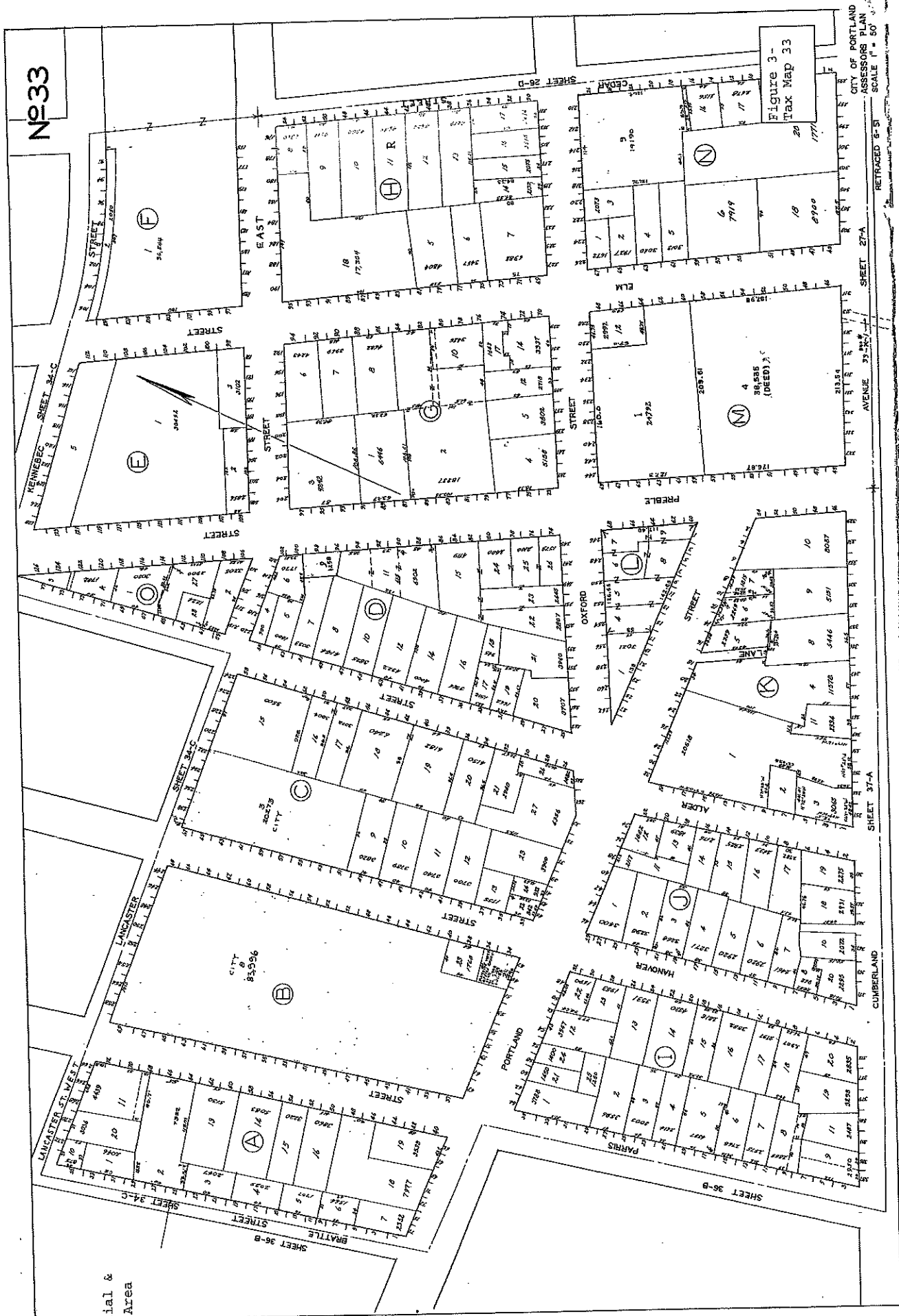


Lancaster Street Property

CHESTNUT STREET PARKING
NOTE: For further information
see Assessor's Office
in 2000 P.A. Map 26



No 33



Residential & Parking Area

Figure 3- TAX Map 33

CITY OF PORTLAND ASSESSORS PLAN SCALE 1" = 50'

SHEET 27-A

SHEET 27-B

SHEET 34-C

SHEET 36-B

SHEET 36-9

SHEET 27-A

SHEET 27-B

SHEET 34-C

SHEET 36-B

SHEET 36-9

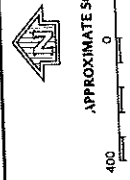
SHEET 27-A

SHEET 27-B

SHEET 34-C

SHEET 36-B

SHEET 36-9



NATIONAL FLOOD INSURANCE PROGRAM

FIRM FLOOD INSURANCE RATE MAP

CITY OF PORTLAND, MAINE CUMBERLAND COUNTY

PANEL 13 OF 17
(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER 230051 0013 B

EFFECTIVE DATE: JULY 17, 1986



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. If the user makes any changes to the map, the user is responsible for the accuracy of the information. The user is advised that the information on this map is for informational purposes only and does not constitute a contract. For the latest product information about National Flood Insurance Program flood maps, check the FEMA Flood Map Store at www.fema.gov

KEY TO MAP

- 500-Year Flood Boundary _____
- 100-Year Flood Boundary _____
- Zone Designations*
 - ZONE A1
 - ZONE B
 - ZONE A3
 - ZONE B
- 100-Year Flood Boundary _____
- 500-Year Flood Boundary _____
- Base Flood Elevation Line With Elevation in Feet** _____ 5'13
- Base Flood Elevation in Feet Where Uniform Within Zone** _____ 16 L 9871
- Elevation Reference Mark _____ RM7X
- Zone D Boundary _____ *M1.5
- River Mile _____

***EXPLANATION OF ZONE DESIGNATIONS**

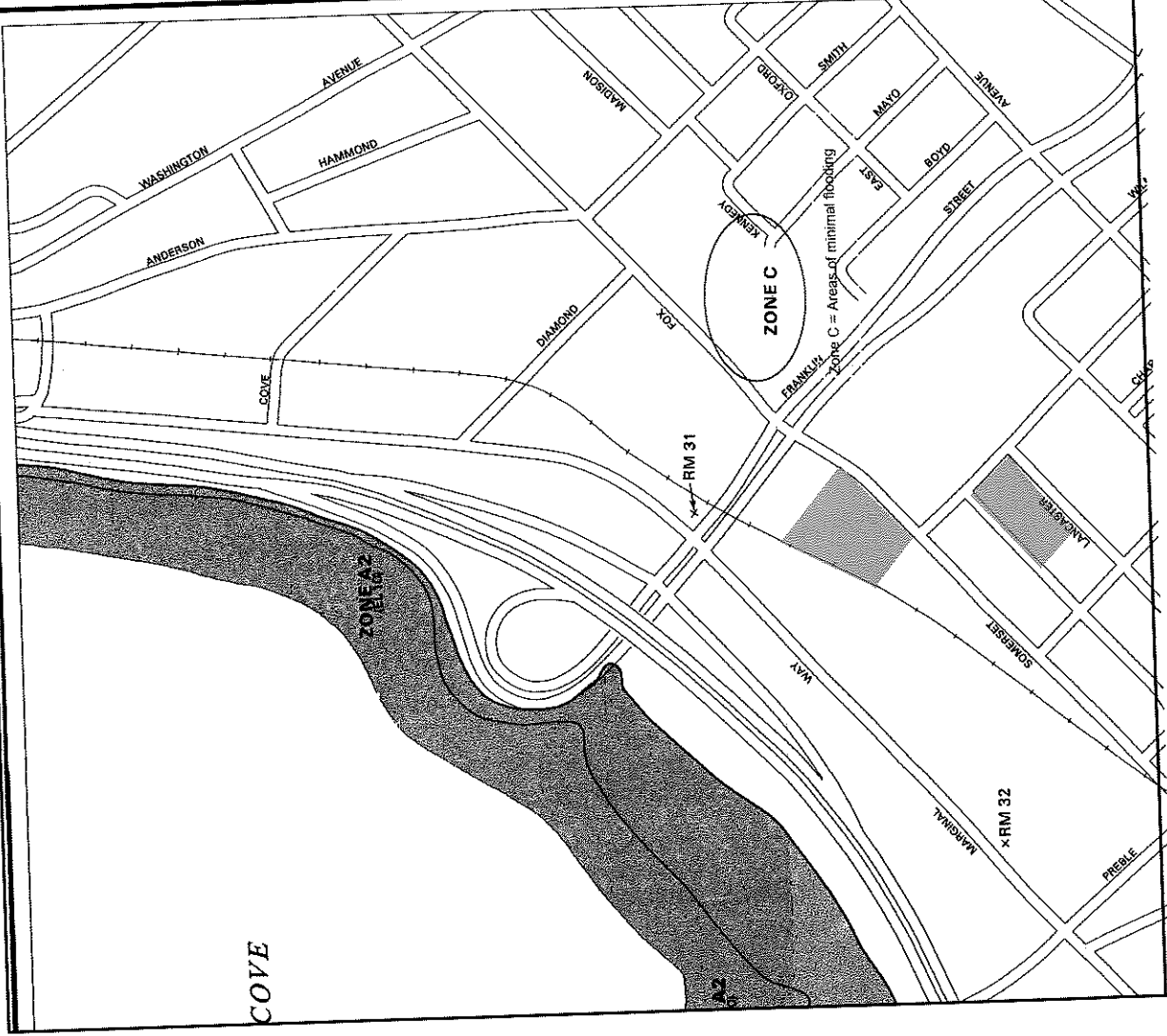
ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
A0	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.
AH	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of the 100-year flood and 500-year flood; or certain areas of 100-year flooding with a return period greater than one (1) foot or where the area of flooding is less than one square mile; or areas protected by levees from the base flood. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.

This map is for flood insurance and flood plain management purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas. The coastal flooding elevations shown may differ significantly from those developed by the National Weather Service for hurricane evacuation planning.

For adjoining map panels, see separately printed Index To Map Panels.



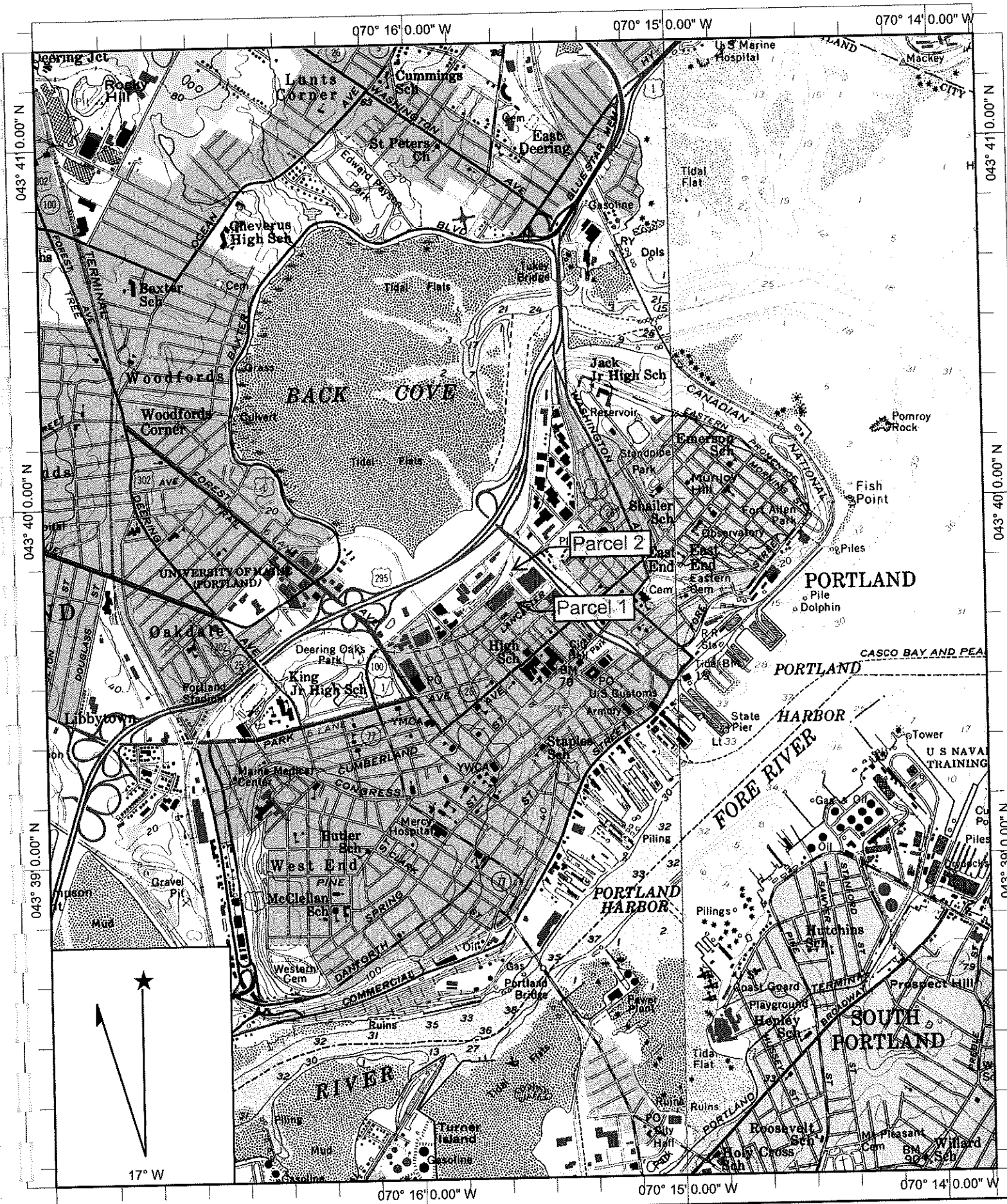
R Residential & Parking Area

No 33



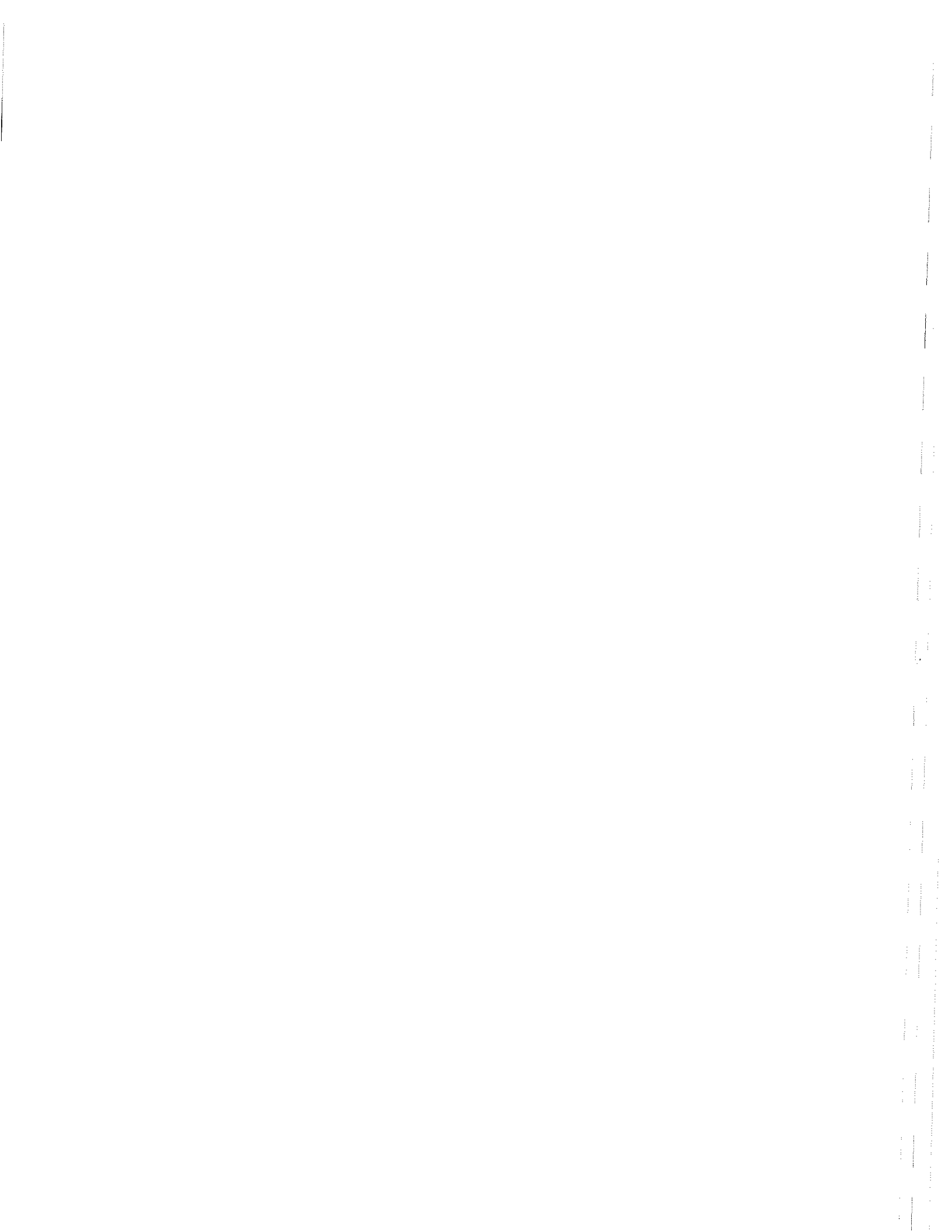
CITY OF PORTLAND
ASSESSORS PLAN
SCALE 1" = 50'

RETRACED 6-51



Name: PORTLAND WEST
 Date: 3/4/2008
 Scale: 1 inch equals 2000 feet

Location: 043° 39' 41.8" N 070° 15' 37.0" W
 Caption: Figure 1- Site Location
 E. Perry Iron Metal Parcel 1 and Parcel 2
 Portland, Maine



Attachment C
Baseline Soil Testing Data
Baseline Groundwater Testing Data

Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



Table 4-1
Woodard & Curran
Summary of Somerset Street Soil Results
E.Perry Site, Portland, Maine

	Maine RAGs		Maine Residential Trespasser		B-A		B-B		B-C		B-D		B-E		SS-A		SS-B		SS-C		
	7.2	2.2	8.1	5.5	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	
Asoclor 1254																					
Asoclor 1280																					
Total PCBs	7.2	2.2	8.1	5.5	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft
Aluminum					5610	4960	3680	44.4	20000	11000	8760	7310	4490								
Antimony					51.7	17.6	44.4	44.4	1.5	2.6	1.4	7.7	24.5								
Arsenic	30	10	30	30	30	30	30	30	8.7	98	181	321	1250								
Barium	10000	10000	10000	10000	604	370	<0.29U	<0.29U	0.74	0.49	0.38	0.56	0.33								
Beryllium	10	4	15	15	<0.21U	<0.25U	<0.25U	<0.25U	1.1	1.1	0.36	8.6	27.6								
Bismuth	23	27	35	35	24.2	10	10.6	10.6	1470	2220	26000	12000	5420								
Cadmium					2970	1280	320	320	45.7	28.2	15.9	50.3	141								
Calcium					69.1	62	123	123	8.7	8.2	5.4	8.9	25.4								
Chromium					14.4	29.1	37.2	37.2	24.1	92.3	66.5	7.20	147.0								
Cobalt					122000	283000	420000	420000	21600	35000	14700	66500	262000								
Copper	600	375	700	700	2730	2880	2880	2880	42.5	165	133	2260	17200								
Iron	700	375	700	700	2890	1930	946	946	6460	4280	2350	458	1340								
Lead					673	1330	2060	2060	273	355	171	3.6	7								
Magnesium					3.6	1.4	2.5	2.5	0.87	3.6	0.054	3.6	7								
Manganese	610	60	320	320	78.7	61.6	104	104	34.5	22.6	12.3	76.9	150								
Mercury	10000	3600	10000	10000	1030	596	427	427	3300	3630	1160	686	641								
Nickel					<4.0	<5.0	<4.0	<4.0	<4.3	<3.9	<0.44	<3.7	<4.3								
Potassium	10000	950	5350	5350	4.0	0.82	0.54	0.54	<0.18	<0.17	<0.19	0.88	1.3								
Selenium	10000	950	5350	5350	394	320	337	337	339	361	86.7	434	299								
Silver					5.4	11.5	17.7	17.7	1.8	1.1	<0.67	3	12.9								
Sodium					25.9	41.5	116	116	36.5	28	18	22.6	69.5								
Thallium					1500	1500	1500	1500	473	435	169J	0.02	0.024								
Vanadium					0.016	0.022	0.016	0.016	0.016	0.013	0.038	0.02	0.024								
Zinc	1500	1500	1500	1500	0.016	0.022	0.016	0.016	0.016	0.013	0.038	0.02	0.024								
Total solids																					

Units in milligrams per kilogram (mg/kg)

RAGs = Remedial Action Guideline

< = not detected at reporting limit

[] = above criteria

J = estimated

R = rejected

U = result revised to nondetect

Table 4-1
Woodard & Curran
Summary of Somerset Street Soil Results
E. Perry Site, Portland, Maine

Maine RAGs	Maine RAGs Residential	Maine RAGs Trespasser	B-A		B-B		B-C		B-D		B-E		SS-A		SS-B		SS-C	
			04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005	04/26/2005
4-Chlorophenyl phenyl ether			0.4 ft	0.4 ft	4-8 ft	4-8 ft	0.4 ft	0.4 ft	4-8 ft	4-8 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft
Chrysene			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Dibenz(a,h)anthracene			2.4	1.7	---	---	8	<0.37J	---	---	0.34J	60	---	---	---	1.3	---	0.64
Dibenzofuran			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
3,3'-Dichlorobenzidine			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4-Dichlorophenol	22	112	<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,6-Dichlorophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Diethyl phthalate			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4-Dimethylphenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Di-n-butyl phthalate			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
4,6-Dinitro-2-methylphenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4-Dinitrophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4-Dinitrotoluene			<0.59J	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,6-Dinitrotoluene			<0.59J	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Di-n-octyl-phthalate			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Fluoranthene			4.6	2.7J	---	---	16	<0.92	---	---	0.53J	150	---	---	---	1.6	---	1
Fluorene			0.49J	<0.63	---	---	1.5J	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Hexachlorobenzene			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Hexachlorocyclopentadiene			<0.59R	<0.63R	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Hexachloroethane			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Indeno(1,2,3-cd)pyrene			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Isophorone			0.94	0.56J	---	---	5	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2-Methylnaphthalene			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2-Methylphenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
3&4-Methylphenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2-Nitroaniline			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
3-Nitroaniline			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
4-Nitroaniline			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Nitrobenzene			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2-Nitrophenol			<0.59	<0.63J	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
4-Nitrophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
n-Nitrosodimethylamine			<0.59	<0.63R	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
n-Nitrosophenylamine			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
n-Nitroso-di-propylamine			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Pentachlorophenol	2	21	<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Phenanthrene			3.5	1.8J	---	---	15	<0.58	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Phenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Pyrene			3.7	2.4J	---	---	15	<0.78	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Pyridine			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,3,4,6-Tetrachlorophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4,5-Trichlorophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
2,4,6-Trichlorophenol			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
TCDF (TCDF)			<0.59	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Aroclor 1016	0.4	0.1	<0.44	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Aroclor 1221		0.2	<0.44	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Aroclor 1232			<0.44	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Aroclor 1242			<0.44	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63
Aroclor 1248			<0.44	<0.63	---	---	<2.8	<0.55	---	---	<0.57	<20	---	---	---	<0.61	---	<0.63

MEDEP Brownfields (212179.02)
FINAL E. Perry Environmental Site Assessment

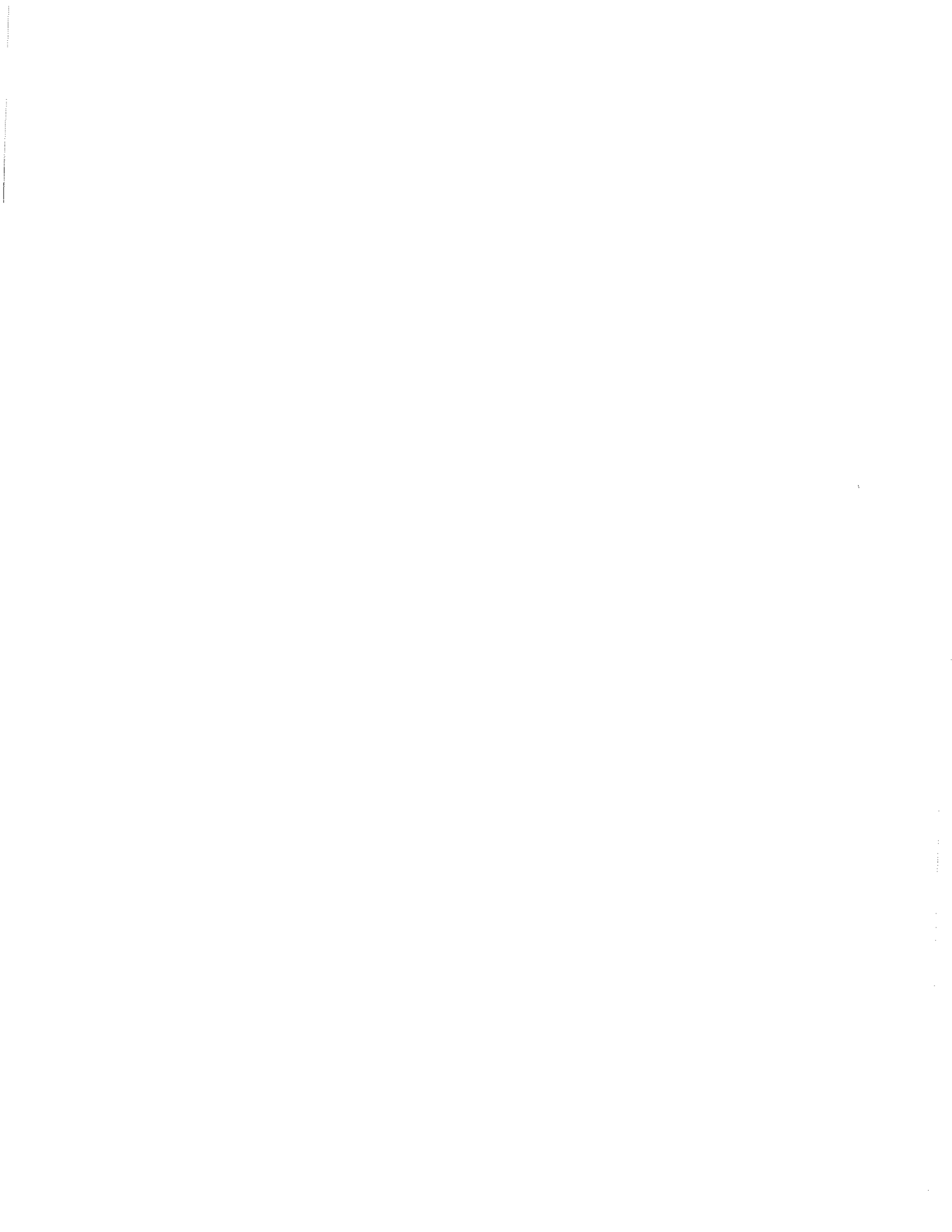


Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

Chemical	Maine RAGs		Maine RAGs Residential		Maine RAGs Trespasser		B-1	B-10	B-11	B-2	B-3	B-4	B-5	B-6	B-6	B-6	B-7	B-7	
	Adult Worker	Residential	Residential	Residential	Trespasser	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft
n-Propylbenzene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J
Styrene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J
Tert-amyl methyl ether						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J
1,1,1,2-Tetrachloroethane	2140	860	2400			<0.032	<0.027	<0.028J	<0.038	<0.026	<0.032	<0.037	<0.037	<0.037	<0.037	<0.31J	<0.31J	<0.31J	<0.31J
1,1,2,2-Tetrachloroethane	7	3	85			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
Tetrachloroethene						<0.21	<0.18	<0.19J	<0.26	<0.18	<0.21	<0.28J	<0.25	<0.25	<0.25	<2.1J	<2.1J	<2.1J	<2.1J
Tetrahydrofuran	3190	2390	10000			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
Toluene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,2,3-Trichlorobenzene	720	540	3600			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,2,4-Trichlorobenzene	350	260	1840			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,1,1-Trichloroethane	7	3	70			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,1,2-Trichloroethane	40	19	400			<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
Trichloroethene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
Trichlorofluoromethane						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,2,3-Trichloropropane						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,2,4-Trimethylbenzene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
1,3,5-Trimethylbenzene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
Vinyl chloride	0.1	0.04	0.8			<0.025J	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
m&p-Xylene						<0.042	<0.036	<0.038J	<0.051	<0.035	<0.043	<0.066J	<0.050	<0.050	<0.050	<0.42J	<0.42J	<0.42J	<0.42J
o-Xylene	10000	10000	10000			0.025	ND	ND	0.028	ND	ND	ND	0.16	ND	ND	ND	ND	ND	ND
Total Xylenes						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2
Total Volatile Organic Compounds (mg/kg)																			
Acenaphthene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2
Acenaphthylene						<0.58	<0.53	<0.28J	<0.55J	<0.56	<0.54J	<0.54J	<1.2J	<1.2J	<1.2J	<1.2J	<1.4J	<1.4J	<1.4J
Aniline						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Anthracene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Azobenzene						0.66	0.34	0.34	0.92	<0.56	0.98	0.98	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benz(b)fluoranthene						<0.58J	<0.53J	<0.28R	<0.55	<0.56	<0.54J	<0.54J	<1.2J	<1.2J	<1.2J	<1.2J	<1.4R	<1.4R	<1.4R
Benzidine						0.48J	<0.53	0.28J	0.87J	<0.56	0.96	0.96	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzo(a)anthracene						0.64	<0.53	0.31	0.88J	<0.56	1	1	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzo(b)pyrene	7	2	9			0.36J	<0.53	0.21J	0.28J	<0.56	0.41J	0.41J	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzo(g,h,i)perylene						0.36J	<0.53	0.27J	0.81J	<0.56	0.93	0.93	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzo(k)fluoranthene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzoic acid						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Benzyl alcohol						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
bis(2-Chloroethoxy)methane						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
bis(2-Chloroethyl) ether						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
bis(2-Chloroisopropyl) ether						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
bis(2-Ethylhexyl) phthalate	3970	1220	4460			<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
4-Bromophenyl phenyl ether						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Butylbenzyl phthalate						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Carbazole						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
4-Chloro-3-methylphenol						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
4-Chloroaniline						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
2-Chloronaphthalene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
2-Chlorophenol						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
4-Chlorophenyl phenyl ether						0.55J	<0.53	0.36	0.96J	<0.56	1.1	1.1	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Chrysene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Dibenz(a,h)anthracene						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
Dibenzofuran						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
3,3'-Dichlorobenzidine						<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4
2,4-Dichlorophenol	22	16	112			<0.58	<0.53	<0.28	<0.55	<0.56	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4	<1.4

Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

Contaminant	Maine RAGs	Maine RAGs Residential	Maine RAGs Trespasser	B-1		B-10		B-11		B-2		B-3		B-4		B-5		B-6		B-7	
				04/27/2005	04/28/2005	04/28/2005	04/28/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/28/2005	04/28/2005	04/29/2005
2,8-Dichlorophenol				0.58	<0.53	<0.53	<0.53	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Diethyl phthalate				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Dimethyl phthalate				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,4-Dimethylphenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Di-n-butyl phthalate				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
4,6-Dinitro-2-methylphenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,4-Dinitrophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,4-Dinitrotoluene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,6-Dinitrotoluene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Di-n-octyl-phthalate				0.95	0.39J	0.39J	0.61	0.61	1.5J	1.5J	<0.56	<0.56	2.1	2.1	4.3	4.3	8.8	8.8	9.5	9.5	1.9
Fluoranthene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Fluorene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Hexachlorobenzene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Hexachlorocyclopentadiene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Hexachloroethane				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Indene(1,2,3-cd)pyrene				0.39J	<0.53	<0.53	<0.28	<0.28	0.34J	0.34J	<0.56	<0.56	0.48J	0.48J	0.68J	0.68J	<1.2	<1.2	<1.2	<1.4	<1.4
Isophorone				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2-Methylnaphthalene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2-Methylphenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
3&4-Methylphenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2-Nitroaniline				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
3-Nitroaniline				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
4-Nitroaniline				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Nitrobenzene				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2-Nitrophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
4-Nitrophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
n-Nitrosodimethylamine				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
n-Nitrosodiphenylamine				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
n-Nitroso-di-propylamine				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Pentachlorophenol	2		21	<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Phenanthrene				0.76	<0.53	<0.53	0.3	0.3	0.51J	0.51J	<0.56	<0.56	1.6	1.6	3	3	6.5	6.5	12	12	<1.4
Phenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Pyrene				0.97	0.30J	0.30J	0.5	0.5	1.3	1.3	<0.56	<0.56	1.7	1.7	4.4	4.4	8.4	8.4	7.5	7.5	<1.4
Pyridine				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,3,4,6-Tetrachlorophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,4,6-Trichlorophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
2,4,6-Trichlorophenol				<0.58	<0.53	<0.53	<0.28	<0.28	<0.55	<0.55	<0.56	<0.54	<0.54	<0.54	<0.54	<1.2	<1.2	<1.2	<1.2	<1.4	<1.4
Aroclor 1016	0.4		0.2	<0.18	<0.17	<0.17	<0.15	<0.15	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.18	<0.18	<0.18	<0.18	<0.15	<0.15
Aroclor 1221				<0.18	<0.17	<0.17	<0.15	<0.15	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.18	<0.18	<0.18	<0.18	<0.15	<0.15
Aroclor 1232				<0.18	<0.17	<0.17	<0.15	<0.15	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.18	<0.18	<0.18	<0.18	<0.15	<0.15
Aroclor 1242				<0.18	<0.17	<0.17	<0.15	<0.15	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.18	<0.18	<0.18	<0.18	<0.15	<0.15
Aroclor 1248				<0.18	<0.17	<0.17	<0.15	<0.15	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.18	<0.18	<0.18	<0.18	<0.15	<0.15
Aroclor 1254				4.2	0.052	0.04	0.04	0.04	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	4.7	1.3	1.3	0.034	0.034	0.034
Aroclor 1260				6.2D	0.11	0.12D	0.16	0.16	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	4.3	1.2	1.2	0.036	0.036	0.036
Total PCBs	7.2	2.2	8.1	10.31	0.162	0.162	0.16	0.16	ND	ND	ND	ND	ND	ND	ND	9.07	2.6	2.6	0.07	0.07	0.07
Aluminum				16700	9890	9300	9300	9300	10800	10800	4760	7810	13200	26600	26600	15.7	15.7	15.7	1.48	1.48	1.48
Antimony				20.3	1.5	1.3	1.3	1.3	1.1	1.1	1.3	1.7	77.7	15.7	15.7	4.6	4.6	4.6	9.9	9.9	9.9
Arsenic	30	10	30	25.3	8.1	7.4	7.4	7.4	50.8	50.8	31.9	347	2600	580	580	2600	2600	2600	40.5	40.5	40.5
Barium	10000	10000	10000	479	47	102	102	102	0.48	0.48	0.2	0.4	0.61	0.39	0.39	0.61	0.61	0.61	0.428	0.428	0.428
Beryllium	10	4	15	0.72	0.46																

Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

	Maine RAGs Adult Worker	Maine RAGs Residential	Maine RAGs Trespasser	B-1		B-10		B-11		B-2		B-3		B-4		B-5		B-6		B-7		
				04/27/2005	04/28/2005	04/28/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/27/2005	04/28/2005	04/28/2005	04/29/2005
Cadmium	23	27	35	10600	26.6	22.9	8.3	2.7	6.5	15	25.6	37.9	199	330	5000	18.7	5000	330	15	15	16.6	6
Calcium				96.1	6.2	5.2	30	61	87.4	60300	188000	15900	188000	60300	188000	60300	188000	60300	188000	60300	188000	60300
Chromium				17.2	19.6	71.7	30	6880	15900	188000	15900	188000	60300	188000	60300	188000	60300	188000	60300	188000	60300	188000
Cobalt	600	650	600	125000	13000	13500	16100	97.7	16741	2510	16741	2510	3920	4790	3920	4790	3920	4790	3920	4790	3920	4790
Copper	700	375	700	3780	58.2	195	41.9	1980	2800	4980	1980	2800	4980	1980	2800	4980	1980	2800	4980	1980	2800	4980
Iron	700	375	700	2640	4160	3550	300	68.9	357	1430	608	9	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018
Lead				986	209	224	0.46	0.22	1.2	15.6	9	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4
Magnesium				1.6	0.024	0.25	28.4	10	26.1	323	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018	23.4	<0.018
Manganese	610	60	320	103	16.9	17.6	2130	885	1260	1460	1460	1460	1460	1460	1460	1460	1460	1460	1460	1460	1460	1460
Mercury	10000	3600	10000	1210	2200	1850	0.38	<0.40	0.59	3.6	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1
Nickel				<4.6	<0.39	<0.34	<0.17	<0.17	0.4	3.6	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1	3.1
Potassium	10000	850	5350	1.7	<0.17	<0.33	139	155	93.6	382	382	382	382	382	382	382	382	382	382	382	382	382
Selenium	10000	950	5350	487	211	237	<0.59	10.6	2.1	74.6	45.5	45.5	45.5	45.5	45.5	45.5	45.5	45.5	45.5	45.5	45.5	45.5
Silver				5.6	0.85	<0.75	25.7	172	332	823J	823J	823J	823J	823J	823J	823J	823J	823J	823J	823J	823J	823J
Sodium				27.3	22.3	25.2	877J	0.011	0.009	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016
Thallium				54.9J	156	156	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011	0.011
Vanadium	1500	1500	1500	2370	0.007	0.007	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012
Zinc	1500	1500	1500	0.015	0.007	0.007	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012	0.012
Total solids																						

Units in milligrams per kilogram (mg/kg)
 RAGs = Remedial Action Guideline
 < = not detected at reporting limit
 [] = above criteria
 B or J = estimated
 R = rejected
 - = not analyzed or not available

Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

	Maine RAGs		Maine RAGs Residential		Maine RAGs Trespasser		B-1		B-10		B-11		B-2		B-3		B-4		B-5		B-6		B-6		B-7		B-7			
	Adult/Worker	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	0.4 ft	
2,6-Dichlorophenol																														
Diethyl phthalate																														
Dimethyl phthalate																														
2,4-Dimethylphenol																														
Di-n-butyl phthalate																														
4,6-Dinitro-2-methylphenol																														
2,4-Dinitrophenol																														
2,6-Dinitrotoluene																														
2,4-Dinitrotoluene																														
Din-octyl-phthalate																														
Fluorene																														
Hexachlorobenzene																														
Hexachlorocyclopentadiene																														
Hexachloroethane																														
Indeno(1,2,3-cd)pyrene																														
Isophorone																														
2-Methylnaphthalene																														
2-Methylphenol																														
3,6,4-Methylphenol																														
2-Nitroaniline																														
3-Nitroaniline																														
4-Nitroaniline																														
Nitrobenzene																														
2-Nitrophenol																														
4-Nitrophenol																														
n-Nitrosodimethylamine																														
n-Nitrosodiphenylamine																														
n-Nitroso-dl-propylamine																														
Pentachlorophenol																														
Phenanthrene																														
Phenol																														
Pyrene																														
Pyridine																														
2,3,4,6-Tetrachlorophenol																														
2,4,5-Trichlorophenol																														
2,4,6-Trichlorophenol																														
TCDFs (TCDFs)																														
TCDFs (TCDFs)																														
Aroclor 1016																														
Aroclor 1221																														
Aroclor 1232																														
Aroclor 1242																														
Aroclor 1248																														
Aroclor 1254																														
Aroclor 1260																														
Total PCBs																														
Aluminum																														
Arsenic																														
Barium																														
Beryllium																														

MEDEP Brownfields (212179.02)
FINAL E. Perry Environmental Site Assessment

Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

Compound	Maine RAGs		Maine RAGs Residential		Maine RAGs Trespasser		B-8		B-9		SS-1		SS-2		SS-3		SS-4		SS-5		SS-6		
	Adult Worker	475	475	475	5330	105	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	
Volatiles, Organics & Semivolatiles (mg/kg)																							
Acetone	635				5330		<0.35J	<0.35	<0.47J	<0.39J	<0.45	<0.40	<0.37	<0.44J									
Benzene	10				105		<0.035J	<0.035	<0.047J	<0.039J	0.14	<0.040	0.053	<0.044J									
Bromobenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Bromochloromethane							<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
Bromodichloromethane							<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
Bromoforn							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Bromomethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
tert-Butyl alcohol							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
n-Butylbenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
sec-Butylbenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
tert-Butylbenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Carbon disulfide							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Carbon tetrachloride	415		310		2180		<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Chlorobenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Chloroethane							<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
Chloroform							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Chloromethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
2-Chlorotoluene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
4-Chlorotoluene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,2-Dibromo-3-chloropropane							<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
Dibromochloromethane							<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
1,2-Dibromoethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Dibromomethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,2-Dichlorobenzene	3580		2870		10000		<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,3-Dichlorobenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,4-Dichlorobenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Dichlorodifluoromethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,1-Dichloroethane	880		845		4520		<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
1,2-Dichloroethane	0.3		0.2		3		<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
1,1-Dichloroethene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,2-Dichloroethene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
trans-1,2-Dichloroethene	180		135		940		<0.026J	<0.026	<0.036J	<0.029J	<0.033	<0.030	<0.028	<0.033J									
trans-1,2-Dichloroethane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,3-Dichloropropane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
2,2-Dichloropropane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
1,1-Dichloropropane							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
cis-1,3-Dichloropropene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
trans-1,3-Dichloropropene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Diethyl ether							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Ethyl t-butyl ether	2210		1870		10000		<0.035J	0.087	<0.047J	<0.039J	0.077	<0.040	0.25	<0.044J									
Ethylbenzene							<0.035J	0.087	<0.047J	<0.039J	0.077	<0.040	0.25	<0.044J									
Hexachlorobutadiene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
2-Hexanone							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Isopropylbenzene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
di-Isopropylether							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
p-Isopropyltoluene							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Methyl ethyl ketone	10000		10000		10000		<0.35J	<0.35	<0.47J	<0.39J	<0.45	<0.40	<0.37	<0.44J									
Methyl isobutyl ketone							<0.35J	<0.35	<0.47J	<0.39J	<0.45	<0.40	<0.37	<0.44J									
Methyl tert-butyl ether							<0.035J	<0.035	<0.047J	<0.039J	<0.045	<0.040	<0.037	<0.044J									
Methylene chloride	28		13		275		<0.17J	<0.17	<0.24J	<0.19J	<0.22	<0.20	<0.18	<0.22J									
Naphthalene	325		245		1710		0.020J	<0.035	<0.047J	<0.039J	<0.045	<0.040	0.16	<0.044J									

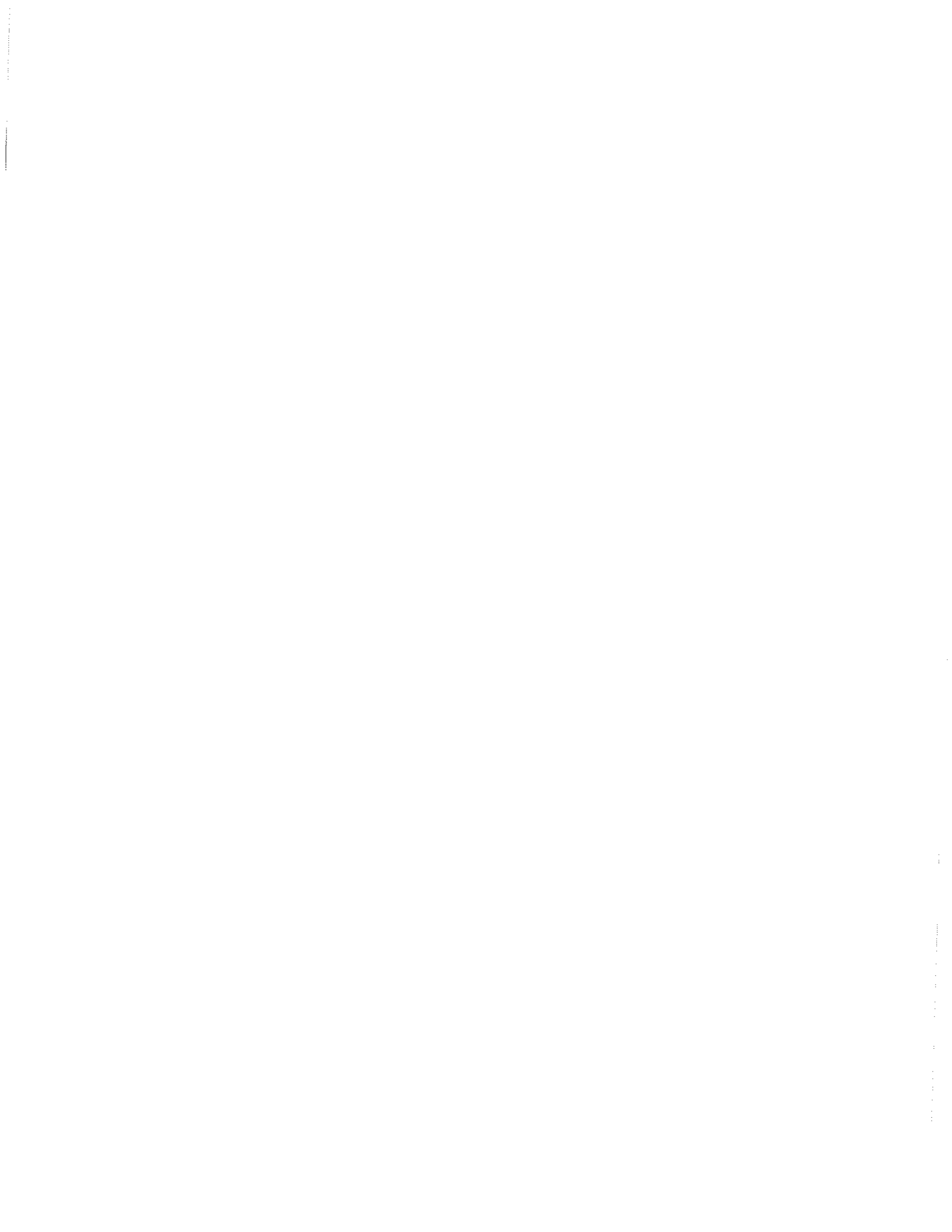


Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

Contaminant	Maine RAGs Residential		Maine RAGs Adult Worker		Maine RAGs Trespasser		B-8		B-9		SS-1		SS-2		SS-3		SS-4		SS-5		SS-6		
	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	04/28/2005	
2,6-Dichlorophenol																							
Diethyl phthalate																							
Dimethyl phthalate																							
2,4-Dimethylphenol																							
Di-n-butyl phthalate																							
4-β-Dinitro-2-methylphenol																							
2,4-Dinitrophenol																							
2,4-Dinitrotoluene																							
2,6-Dinitrotoluene																							
Di-n-octyl-phthalate																							
Fluoranthene																							
Fluorene																							
Hexachlorobenzene																							
Hexachlorocyclopentadiene																							
Hexachloroethane																							
Indeno(1,2,3-cd)pyrene																							
Isophorone																							
2-Methylnaphthalene																							
2-Methylphenol																							
3,8,4-Methylphenol																							
2-Nitroaniline																							
3-Nitroaniline																							
4-Nitroaniline																							
Nitrobenzene																							
2-Nitrophenol																							
4-Nitrophenol																							
n-Nitrosodimethylamine																							
n-Nitrosodiphenylamine																							
n-Nitrosodi-propylamine																							
Pentachlorophenol	2	1																					
Phenanthrene																							
Phenol																							
Pyrene																							
Pyridine																							
2,3,4,6-Tetrachlorophenol																							
2,4,6-Trichlorophenol																							
2,4,6-Trichlorophenol																							
PCBs (Total)	0.4	0.1																					
Aroclor 1016																							
Aroclor 1221																							
Aroclor 1232																							
Aroclor 1242																							
Aroclor 1248																							
Aroclor 1254																							
Aroclor 1260																							
Total PCBs	7.2	2.2	8.1	1.23	0.138																		
PAHs (Total)																							
Aluminum				6410	9510																		
Antimony				1.7	1.0B																		
Arsenic	30	10	30	7.6	8.7																		
Barium	10000	10000	10000	34.8	31.9																		
Beryllium	10	4	15	0.33	0.40B																		
Cadmium																							
Chromium																							
Copper																							
Lead																							
Manganese																							
Mercury																							
Nickel																							
Selenium																							
Silver																							
Sulfur																							
Vanadium																							
Zinc																							

Table 4-2
Woodard & Curran
Summary of Lancaster Street Soil Results
E. Perry Site, Portland, Maine

	Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs		Maine RAGs			
	Adult Worker	Residential	Residential	Trespasser	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	0-4 ft	
Cadmium	23	27	27	35	0.16	0.23B	1.4	1.4	8500	3375	6.8	6.8	6190	2800	25.1	25.1	2800	2800	25.1	25.1	2800	1540
Calcium	---	---	---	---	15.9	23	33.1	33.1	144	144	146	146	20500	159	7.8	7.8	159	159	7.8	7.8	159	35.9
Chromium	---	---	---	---	4.8	4.8	7.7	7.7	16.7	16.7	16.7	16.7	146	15.7	15.7	15.7	15.7	15.7	15.7	15.7	15.7	5.8
Cobalt	---	---	---	---	39.5	16.2	149	149	115000	115000	115000	115000	115000	134000	85.2	85.2	18100	18100	85.2	85.2	18100	321
Copper	600	650	650	600	14600	13000	37300	37300	115000	115000	115000	115000	115000	134000	211	211	4200	4200	211	211	4200	27000
Iron	700	375	---	700	120	15.2	3470	2230	12600	12600	1540	1540	1540	2640	281	281	4200	4200	281	281	4200	3080
Lead	---	---	---	---	159	160	424	424	671	671	2320	2320	2320	843	0.24	0.24	281	281	0.24	0.24	281	533
Magnesium	---	---	---	---	0.11	<0.017	0.46	0.46	3.3	3.3	0.43	0.43	0.43	3.5	18.1	18.1	22	22	18.1	18.1	22	18.1
Manganese	610	60	60	320	12.9	15.2	27.3	27.3	231	231	713	713	713	122	122	122	122	122	122	122	18.1	
Mercury	10000	3600	---	10000	1250	1590	1260	1260	1030	1030	1030	1030	1030	1180	1180	1180	1180	1180	1180	1180	1260	
Nickel	---	---	---	---	<0.35	<0.40	<5.3	<5.3	<5.4	<5.4	<4.0	<4.0	<4.0	<4.3	<0.40	<0.40	<0.17	<0.17	<0.40	<0.17	<0.17	<0.22
Potassium	10000	950	---	5350	<0.34	<0.17	0.31	0.31	3.2	3.2	2.1	2.1	2.1	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	
Selenium	10000	950	---	5350	---	---	324	324	1110	1110	135	135	135	1630	49.7	49.7	1630	1630	49.7	49.7	1630	177
Silver	---	---	---	---	156	147B	156	156	27	27	6.6	6.6	6.6	6.2	1	1	6.2	6.2	1	1	6.2	1
Sodium	---	---	---	---	<0.78	<0.61	1.5	1.5	5.5	5.5	113	113	113	32.1	19.7	19.7	32.1	32.1	19.7	19.7	32.1	24.9
Thallium	---	---	---	---	15.4	17.4	25.9	25.9	27	27	27	27	27	19.7	19.7	19.7	19.7	19.7	19.7	19.7	19.7	24.9
Vanadium	---	---	---	---	128	31.1	1210J	1210J	18700	18700	18700	18700	18700	15300J	744J	744J	15300J	15300J	744J	744J	15300J	217J
Zinc	1500	1600	---	1500	0.011	0.008	0.024	0.024	0.015	0.015	0.013	0.013	0.013	0.01	0.013	0.013	0.01	0.013	0.013	0.013	0.015	
Total solids	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Units in milligrams per kilogram (mg/kg)
RAGs = Remedial Action Guideline
< = not detected at reporting limit
[] = above criteria
B or J = estimated
R = rejected
- = not analyzed or not available

Table 4-3
Woodard & Curran
Summary of Somerset Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-A	MW-B	MW-C	MW-D	MW-E
		MW-A	MW-B	MW-C	MW-D	MW-E
		05/02/2005	05/02/2005	05/02/2005	05/02/2005	04/29/2005
Volatile Organic Compounds (UG/L)						
Acetone	700	<10	<10	13	<10	28
Benzene	12	<2	<2	<2	<2	<2
Bromobenzene	---	<2	<2	<2	<2	<2
Bromochloromethane	10	<2	<2	<2	<2	<2
Bromodichloromethane	6	<2	<2	<2	<2	<2
Bromoform	44	<2	<2	<2	<2	<2
Bromomethane	10	<2	<2	<2	<2	<2
tert-Butyl alcohol	---	<20	<20	<20	<20	15J
n-Butylbenzene	---	<2	<2	<2	<2	<2
sec-Butylbenzene	---	<2	<2	<2	<2	<2
tert-Butylbenzene	---	<2	<2	<2	<2	<2J
Carbon disulfide	---	<2	<2	<2	<2	<2
Carbon tetrachloride	3	<2	<2	<2	<2	<2
Chlorobenzene	---	<2	<2	<2	<2	<2J
Chloroethane	---	<2	<2	<2	<2	<2
Chloroform	57	<2	<2	<2	<2	<2J
Chloromethane	3	<2	<2	<2	<2	<2
2-Chlorotoluene	140	<2	<2	<2	<2	<2
4-Chlorotoluene	140	<2	<2	<2	<2	<2
1,2-Dibromo-3-chloropropane	0.25	<2	<2	<2	<2	<2
Dibromochloromethane	4	<2	<2	<2	<2	<2
1,2-Dibromoethane	0.004	<2	<2	<2	<2	<2
Dibromomethane	---	<2	<2	<2	<2	<2
1,2-Dichlorobenzene	63	<2	<2	<2	<2	<2
1,3-Dichlorobenzene	60	<2	<2	<2	<2	<2
1,4-Dichlorobenzene	21	<2	<2	<2	<2	<2
Dichlorodifluoromethane	1400	<2	<2	<2	<2	<2
1,1-Dichloroethane	70	<2	<2	<2	<2	<2
1,2-Dichloroethane	4	<2	<2	<2	<2	<2J
1,1-Dichloroethene	0.6	<2	<2	<2	<2	<2
cis-1,2-Dichloroethene	70	<2	<2	<2	<2	<2
trans-1,2-Dichloroethene	140	<2	<2	<2	<2	<2
1,2-Dichloropropane	5	<2	<2	<2	<2	<2
1,3-Dichloropropane	---	<2	<2	<2	<2	<2
2,2-Dichloropropane	---	<2	<2	<2	<2	<2
1,1-Dichloropropene	---	<2	<2	<2	<2	<2
cis-1,3-Dichloropropene	---	<2	<2	<2	<2	<2
trans-1,3-Dichloropropene	---	<2	<2	<2	<2	<2J
Diethyl ether	---	<2J	<2J	<2J	<2J	<2J
Ethyl t-butyl ether	---	<2	<2	<2	<2	<2
Ethylbenzene	70	<2	<2	<2	<2	<2J
Hexachlorobutadiene	4	<2	<2	<2	<2	<2
2-Hexanone	---	<10	<10	<10	<10	<10
Isopropylbenzene	---	<2	<2	<2	<2	<2
di-Isopropylether	---	<2	<2	<2	<2	<2
p-Isopropyltoluene	70	<2	<2	<2	<2	<2
Methyl ethyl ketone	1440	<10J	<10J	<10J	<10J	8J
Methyl isobutyl ketone	---	<10	<10	<10	<10	<10
Methyl tert-butyl ether	35	<2	<2	2	<2	9J
Methylene chloride	47	<5	<5	<5	<5	<5
Naphthalene	14	<2	<2	<2	<2	<2
n-Propylbenzene	---	<2	<2	<2	<2	<2
Styrene	140	<2	<2	<2	<2	11
Tert-amyl methyl ether	---	<2	<2	<2	<2	<2
1,1,1,2-Tetrachloroethane	13	<2	<2	<2	<2	<2
1,1,2,2-Tetrachloroethane	1.8	<2	<2	<2	<2	<2
Tetrachloroethene	7	<2	<2	<2	<2	<2
Tetrahydrofuran	70	<5	<5	<5	<5	<5
Toluene	1400	<2	<2	<2	<2	<2
1,2,3-Trichlorobenzene	---	<2	<2	<2	<2	<2
1,2,4-Trichlorobenzene	70	<2	<2	<2	<2	<2J
1,1,1-Trichloroethane	200	<2	<2	<2	<2	<2
1,1,2-Trichloroethane	6	<2	<2	<2	<2	<2
Trichloroethene	32	<2	<2	<2	<2	<2
Trichlorofluoromethane	2000	<2	<2	<2	<2	<2
1,2,3-Trichloropropane	0.05	<2	<2	<2	<2	<2
1,2,4-Trimethylbenzene	---	<2J	<2	<2	<2	4

Table 4-3
Woodard & Curran
Summary of Somerset Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-A	MW-B	MW-C	MW-D	MW-E
		MW-A 05/02/2005	MW-B 05/02/2005	MW-C 05/02/2005	MW-D 05/02/2005	MW-E 04/29/2005
1,3,5-Trimethylbenzene	---	<2	<2	<2	<2	<2
Vinyl chloride	0.2	<2	<2	<2	<2	10
m&p-Xylene	---	<2	<2	<2	<2	<2
o-Xylene	---	<2	<2	<2	<2	<2
Total Xylenes	14000	ND	ND	ND	ND	10
Semi-Volatile Organic Compounds (ug/l)						
3-Nitroaniline	---	---	---	---	---	<2
Acenaphthene	---	<2	<2	<2	<2	<2
Acenaphthylene	---	<2	<2	<2	<2	<2
Aniline	---	---	---	---	---	<2
Anthracene	---	<2	<2	<2	<2	<2
Azobenzene	---	<2	<2	<2	<2	<2
Benzidine	---	<20J	<20J	<20J	<20J	<20R
Benzo(a)anthracene	---	<2	<2	<2	<2	<2
Benzo(a)pyrene	0.05	<2	<2	<2	<2	<2
Benzo(b)fluoranthene	---	<2	<2	<2	<2	<2
Benzo(g,h,i)perylene	---	---	---	---	---	<2
Benzo(k)fluoranthene	---	<2	<2	<2	<2	<2
Benzoic acid	---	<10	<10	<10	<10J	<10J
Benzyl alcohol	---	<5	<5	<5	<5J	<5J
bis(2-Chloroethoxy)methane	---	<2	<2	<2	<2	<2
bis(2-Chloroethyl) ether	0.3	<2	<2	<2	<2	<2
bis(2-Chloroisopropyl) ether	300	<2	<2	<2	<2	<2
bis(2-Ethylhexyl) phthalate	---	<2	<2	6	<2	<2
4-Bromophenyl phenyl ether	---	<2	<2	<2	<2	<2
Butylbenzyl phthalate	---	<2	<2	<2	<2	<2
Carbazole	---	---	---	---	---	<2
4-Chloro-3-methylphenol	---	<10	<10	<10	<10J	<10J
4-Chloroaniline	---	---	---	---	---	<2
2-Chloronaphthalene	---	---	---	---	---	<2
2-Chlorophenol	35	<5	<5	<5	<5J	<5J
4-Chlorophenyl phenyl ether	---	<2	<2	<2	<2	<2
Chrysene	---	---	---	---	---	<2
Dibenzo(a,h)anthracene	---	---	---	---	---	<2
Dibenzofuran	---	---	---	---	---	<2
3,3'-Dichlorobenzidine	---	<20	<20	<20	<20	<20
2,4-Dichlorophenol	21	<5	<5	<5	<5J	<5J
2,6-Dichlorophenol	---	<5	<5	<5	<5J	<5J
Diethyl phthalate	5000	<2	<2	<2	<2	<2
Dimethyl phthalate	---	<2J	<2J	<2J	<2J	<2J
2,4-Dimethylphenol	---	<5	<5	<5	<5J	<5J
Di-n-butyl phthalate	700	<2	<2	<2	<2	<2
4,6-Dinitro-2-methylphenol	---	<5	<5	<5	<5J	<5J
2,4-Dinitrophenol	14	<5	<5	<5	<5J	<5J
2,4-Dinitrotoluene	0.5	<2	<2	<2	<2	<2
2,6-Dinitrotoluene	0.5	<2	<2	<2	<2	<2
Di-n-octyl-phthalate	---	<2	<2	<2	<2	<2
Fluoranthene	---	---	---	---	---	<2
Fluorene	---	---	---	---	---	<2
Hexachlorobenzene	0.2	<2	<2	<2	<2	<2
Hexachlorocyclopentadiene	50	<2	<2	<2	<2	<2
Hexachloroethane	7	---	---	---	---	<2
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	<2
Isophorone	370	---	---	---	---	<2
2-Methylnaphthalene	---	---	---	---	---	<2
2-Methylphenol	---	<5	<5	<5	<5J	<5J
3&4-Methylphenol	---	<5	<5	<5	<5J	<5J
2-Nitroaniline	---	---	---	---	---	<2
4-Nitroaniline	---	---	---	---	---	<2
Nitrobenzene	3.5	<2	<2	<2	<2	<2
2-Nitrophenol	---	<5	<5	<5	<5J	<5J
4-Nitrophenol	60	<5	<5	<5	<5J	<5J
n-Nitrosodimethylamine	---	---	---	---	---	<2
n-Nitrosodiphenylamine	---	---	---	---	---	<2
n-Nitroso-di-propylamine	---	---	---	---	---	<2
Pentachlorophenol	3	<10	<10	<10	<10J	<10J
Phenanthrene	---	---	---	---	---	<2
Phenol	4000	<5	<5	<5	<5J	<5J

Table 4-3
Woodard & Curran
Summary of Somerset Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-A	MW-B	MW-C	MW-D	MW-E
		MW-A	MW-B	MW-C	MW-D	MW-E
		05/02/2005	05/02/2005	05/02/2005	05/02/2005	04/29/2005
Volatile Organic Compounds (ug/L)						
Acetone	700	<10	<10	13	<10	28
Benzene	12	<2	<2	<2	<2	28J
Bromobenzene	---	<2	<2	<2	<2	<2
Bromochloromethane	10	<2	<2	<2	<2	<2
Bromodichloromethane	6	<2	<2	<2	<2	<2
Bromoform	44	<2	<2	<2	<2	<2
Bromomethane	10	<2	<2	<2	<2	<2
tert-Butyl alcohol	---	<20	<20	<20	<20	<2
n-Butylbenzene	---	<2	<2	<2	<2	15J
sec-Butylbenzene	---	<2	<2	<2	<2	<2
tert-Butylbenzene	---	<2	<2	<2	<2	<2
Carbon disulfide	---	<2	<2	<2	<2	<2
Carbon tetrachloride	3	<2	<2	<2	<2	<2J
Chlorobenzene	---	<2	<2	<2	<2	<2
Chloroethane	---	<2	<2	<2	<2	<2
Chloroform	57	<2	<2	<2	<2	<2J
Chloromethane	3	<2	<2	<2	<2	<2
2-Chlorotoluene	140	<2	<2	<2	<2	<2J
4-Chlorotoluene	140	<2	<2	<2	<2	<2
1,2-Dibromo-3-chloropropane	0.25	<2	<2	<2	<2	<2
Dibromochloromethane	4	<2	<2	<2	<2	<2
1,2-Dibromoethane	0.004	<2	<2	<2	<2	<2
Dibromomethane	---	<2	<2	<2	<2	<2
1,2-Dichlorobenzene	63	<2	<2	<2	<2	<2
1,3-Dichlorobenzene	60	<2	<2	<2	<2	<2
1,4-Dichlorobenzene	21	<2	<2	<2	<2	<2
Dichlorodifluoromethane	1400	<2	<2	<2	<2	<2
1,1-Dichloroethane	70	<2	<2	<2	<2	<2
1,2-Dichloroethane	4	<2	<2	<2	<2	<2
1,1-Dichloroethene	0.6	<2	<2	<2	<2	<2
cis-1,2-Dichloroethene	70	<2	<2	<2	<2	<2J
trans-1,2-Dichloroethene	140	<2	<2	<2	<2	<2
1,2-Dichloropropane	5	<2	<2	<2	<2	<2
1,3-Dichloropropane	---	<2	<2	<2	<2	<2
2,2-Dichloropropane	---	<2	<2	<2	<2	<2
1,1-Dichloropropene	---	<2	<2	<2	<2	<2
cis-1,3-Dichloropropene	---	<2	<2	<2	<2	<2
trans-1,3-Dichloropropene	---	<2	<2	<2	<2	<2
Diethyl ether	---	<2J	<2J	<2J	<2J	<2J
Ethyl t-butyl ether	---	<2	<2	<2	<2	<2
Ethylbenzene	70	<2	<2	<2	<2	<2
Hexachlorobutadiene	4	<2	<2	<2	<2	1J
2-Hexanone	---	<10	<10	<10	<10	<2J
Isopropylbenzene	---	<2	<2	<2	<2	<10
di-Isopropylether	---	<2	<2	<2	<2	<2
p-Isopropyltoluene	70	<2	<2	<2	<2	<2
Methyl ethyl ketone	1440	<10J	<10J	<10J	<10J	<2
Methyl isobutyl ketone	---	<10	<10	<10	<10	8J
Methyl tert-butyl ether	35	<2	<2	2	<2	<10
Methylene chloride	47	<5	<5	<5	<5	9J
Naphthalene	14	<2	<2	<2	<2	<5
n-Propylbenzene	---	<2	<2	<2	<2	<2
Styrene	140	<2	<2	<2	<2	<2
Tert-amyl methyl ether	---	<2	<2	<2	<2	<2
1,1,1,2-Tetrachloroethane	13	<2	<2	<2	<2	11
1,1,2,2-Tetrachloroethane	1.8	<2	<2	<2	<2	<2
Tetrachloroethene	7	<2	<2	<2	<2	<2
Tetrahydrofuran	70	<5	<5	<5	<5	<2
Toluene	1400	<2	<2	<2	<2	<5
1,2,3-Trichlorobenzene	---	<2	<2	<2	<2	<2
1,2,4-Trichlorobenzene	70	<2	<2	<2	<2	<2
1,1,1-Trichloroethane	200	<2	<2	<2	<2J	<2
1,1,2-Trichloroethane	6	<2	<2	<2	<2	<2
Trichloroethene	32	<2	<2	<2	<2	<2
Trichlorofluoromethane	2000	<2	<2	<2	<2	<2
1,2,3-Trichloropropane	0.05	<2	<2	<2	<2	<2
1,2,4-Trimethylbenzene	---	<2J	<2	<2	<2	4

Table 4-3
Woodard & Curran
Summary of Somerset Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-A	MW-B	MW-C	MW-D	MW-E
		MW-A	MW-B	MW-C	MW-D	MW-E
		05/02/2005	05/02/2005	05/02/2005	05/02/2005	04/29/2005
Pyrene	---	---	---	---	---	<2
Pyridine	---	---	---	---	---	<2
2,3,4,6-Tetrachlorophenol	---	<5	<5	<5	<5J	<5J
2,4,5-Trichlorophenol	---	<5	<5	<5	<5J	<5J
2,4,6-Trichlorophenol	32	<5	<5	<5	<5J	<5J
PCBs (ug/L)						
Aroclor 1016	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1221	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1232	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1242	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1248	---	<0.2	0.23	<0.2J	<0.2	<0.2
Aroclor 1254	---	<0.2	<0.2J	<0.2J	<0.2J	<0.2J
Aroclor 1260	---	<0.2J	<0.2J	<0.2J	<0.2J	<0.2J
Total PCBs	0.5	ND	0.23	ND	ND	ND
Dissolved Inorganic Analytes (ug/L)						
Aluminum	1430	<88.0	<88.0	<88.0	<88.0	192
Antimony	3	16.6B	<4.1	<4.1	<4.1	<8.3
Arsenic	10	<4.2	<4.2	<4.2	<4.2	<4.5
Barium	2000	72.1B	196B	45.4B	109	175
Beryllium	---	<0.29U	<0.20	<0.20	<0.20	<0.30
Cadmium	3.5	1.8B	2.2B	<0.60	<0.60	<0.80
Calcium	---	82200	65700	60100	82900	52100
Chromium	40	<1.2	<1.2	<1.2	<1.2	<2.5
Cobalt	---	3.8B	<2.7	<2.7	<2.7	<3.7
Copper	1300	9.7B	3.9B	3.5B	<2.6	<4.2
Iron	---	87.5B	38.9B	<37.9	2060	29800
Lead	10	<2.9	3.2	<2.9	<2.9	7.6
Magnesium	---	17000	7880	86900	18300	10800
Manganese	500	15.1B	396	7.85B	15.70B	13.20B
Mercury	2	<0.10	<0.10	<0.10	<0.10	<0.10
Nickel	140	19.6B	10.7B	11.0B	5.7	6.8
Potassium	---	9510	2860B	72600	21600	17100
Selenium	35	<4.2	<4.2	<4.2	<4.2	<3.8
Silver	35	<1.8	<1.8	<1.8	<1.8	<3.7
Sodium	20000	27500B	27900B	1010000B	92700B	134600B
Thallium	0.5	<6.4	<6.4	<6.4	<6.4	<8.5
Vanadium	---	<2.7	<2.7	<2.7	<2.7	<4.3
Zinc	2000	631	475	35.2	87.9	58.9

Units in micrograms per liter (ug/l)
MEG = Maximum Exposure Guideline
< = not detected at reporting limit
[] = above criteria
B or J = estimated
R = rejected
U = revised to nondetect

Table 4-4
Woodard & Curran
Summary of Lancaster Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-11	MW-3	MW-3	MW-5	MW-6	MW-7	MW-8	MW-9	MW-9
		05/03/05	05/03/05	05/03/05	05/02/05	05/02/05	05/03/05	05/02/05	05/03/05	05/03/05
		Primary	Primary	Duplicate	Primary	Primary	Primary	Primary	Primary	Duplicate
Volatile Organic Compounds (UG/L)										
Acetone	700	<10	<10	<10	22	<10	<10	<10	<10	<10
Benzene	12	<2	<2	<2	<2	<2	<2	<2	<2	<2
Bromobenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Bromochloromethane	10	<2	<2	<2	<2	<2	<2	<2	<2	<2
Bromodichloromethane	6	<2	<2	<2	<2	<2	<2	<2	<2	<2
Bromoform	44	<2	<2	<2	<2	<2	<2	<2	<2	<2
Bromomethane	10	<2	<2	<2	<2	<2	<2	<2	<2	<2
tert-Butyl alcohol	---	<20	<20	<20	<20	<20	<20	<20	<20	<20
n-Butylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
sec-Butylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
tert-Butylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Carbon disulfide	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Carbon tetrachloride	3	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chlorobenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chloroethane	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chloroform	57	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chloromethane	3	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Chlorotoluene	140	<2	<2	<2	<2	<2	<2	<2	<2	<2
4-Chlorotoluene	140	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2-Dibromo-3-chloropropane	0.25	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dibromochloromethane	4	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2-Dibromoethane	0.004	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dibromomethane	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2-Dichlorobenzene	63	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,3-Dichlorobenzene	60	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,4-Dichlorobenzene	21	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dichlorodifluoromethane	1400	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1-Dichloroethane	70	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2-Dichloroethane	4	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1-Dichloroethene	0.6	<2	<2	<2	<2	<2	<2	<2	<2	<2
cis-1,2-Dichloroethene	70	<2J	<2J	<2J	<2	<2	<2J	<2J	<2J	<2J
trans-1,2-Dichloroethene	140	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2-Dichloropropane	5	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,3-Dichloropropane	---	<2	<2	<2	<2	<2	<2J	<2J	<2J	<2J
2,2-Dichloropropane	---	<2J	<2	<2	<2	<2	<2	<2	<2	<2
1,1-Dichloropropene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
cis-1,3-Dichloropropene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
trans-1,3-Dichloropropene	---	<2	<2	<2	<2J	<2J	<2	<2	<2	<2
Diethyl ether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Ethyl t-butyl ether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Ethylbenzene	70	<2	<2	<2	<2	<2	<2	<2	<2	<2
Hexachlorobutadiene	4	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Hexanone	---	<10	<10	<10	<10	<10	<10	<10	<10	<10
Isopropylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
di-Isopropylether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
p-Isopropyltoluene	70	<2	<2	<2	<2	<2	<2	<2	<2	<2
Methyl ethyl ketone	1440	<10	<10	<10	<10J	<10J	<10	<10	<10	<10
Methyl isobutyl ketone	---	<10	<10	<10	<10	<10	<10	<10	<10	<10
Methyl tert-butyl ether	35	<2	4	3	<2	<2	<2	<2	<2	<2
Methylene chloride	47	<5	<5	<5	<5	<5	<2	<2	<2	<2
Naphthalene	14	<2	<2	<2	<2	<2	<2	<2	<2	<2
n-Propylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Styrene	140	<2	<2	<2	<2	<2	2	4	<2	<2
Tert-amyl methyl ether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1,1,2-Tetrachloroethane	13	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1,2,2-Tetrachloroethane	1.8	<2	<2	<2	<2	2	<2	<2	<2	<2
Tetrachloroethene	7	<2	<2	<2	<2	<2	<2	<2	<2	<2
Tetrahydrofuran	70	<5	<5	<5	<5	<5	<5	<5	<5	<5
Toluene	1400	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2,3-Trichlorobenzene	---	<2	<2	<2	<2J	<2J	<2	<2	<2	<2
1,2,4-Trichlorobenzene	70	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1,1-Trichloroethane	200	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,1,2-Trichloroethane	6	<2	<2	<2	<2	<2	<2	<2	<2	<2

**Table 4-3
Woodard & Curran
Summary of Somerset Street Groundwater Results
E.Perry Site, Portland, Maine**

	MEG	MW-A	MW-B	MW-C	MW-D	MW-E
		05/02/2005	05/02/2005	05/02/2005	05/02/2005	04/29/2005
Pyrene	---	---	---	---	---	<2
Pyridine	---	---	---	---	---	<2
2,3,4,6-Tetrachlorophenol	---	<5	<5	<5	<5J	<5J
2,4,5-Trichlorophenol	---	<5	<5	<5	<5J	<5J
2,4,6-Trichlorophenol	32	<5	<5	<5	<5J	<5J
PCBs (ug/l)						
Aroclor 1016	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1221	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1232	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1242	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1248	---	<0.2	<0.2	<0.2J	<0.2	<0.2
Aroclor 1254	---	<0.2	0.23	<0.2J	<0.2	<0.2
Aroclor 1260	---	<0.2J	<0.2J	<0.2J	<0.2J	<0.2J
Total PCBs	0.5	ND	0.23	ND	ND	ND
Dissolved Inorganic Analytes (ug/l)						
Aluminum	1430	<88.0	<88.0	<88.0	<88.0	192
Antimony	3	[6.6]B	<4.1	<4.1	<4.1	<8.3
Arsenic	10	<4.2	<4.2	<4.2	<4.2	<4.5
Barium	2000	72.1B	196B	45.4B	109	175
Beryllium	---	<0.29U	<0.20	<0.20	<0.20	<0.30
Cadmium	3.5	1.8B	2.2B	<0.60	<0.60	<0.80
Calcium	---	82200	65700	60100	82900	52100
Chromium	40	<1.2	<1.2	<1.2	<1.2	<2.5
Cobalt	---	3.8B	<2.7	<2.7	<2.7	<3.7
Copper	1300	9.7B	3.9B	3.5B	<2.6	<4.2
Iron	---	87.5B	38.9B	<37.9	2060	29800
Lead	10	<2.9	3.2	<2.9	<2.9	7.6
Magnesium	---	17000	7880	86900	18300	10800
Manganese	500	[5.1]	396	[7.8]	[15.7]	[13.2]
Mercury	2	<0.10	<0.10	<0.10	<0.10	<0.10
Nickel	140	19.6B	10.7B	11.0B	5.7	6.8
Potassium	---	9510	2860B	72600	21600	17100
Selenium	35	<4.2	<4.2	<4.2	<4.2	<3.8
Silver	35	<1.8	<1.8	<1.8	<1.8	<3.7
Sodium	20000	[27500]	[27900]	[1010000]	[92700]	[134000]
Thallium	0.5	<6.4	<6.4	<6.4	<6.4	<8.5
Vanadium	---	<2.7	<2.7	<2.7	<2.7	<4.3
Zinc	2000	631	475	35.2	87.9	58.9

Units in micrograms per liter (ug/l)
 MEG = Maximum Exposure Guideline
 < = not detected at reporting limit
 [] = above criteria
 B or J = estimated
 R = rejected
 U = revised to nondetect

Table 4-4
Woodard & Curran
Summary of Lancaster Street Groundwater Results
E.Perry Site, Portland, Maine

	MEG	MW-11	MW-3	MW-3	MW-5	MW-6	MW-7	MW-8	MW-9	MW-9
		05/03/05	05/03/05	05/03/05	05/02/05	05/02/05	05/03/05	05/02/05	05/03/05	05/03/05
		Primary	Primary	Duplicate	Primary	Primary	Primary	Primary	Primary	Duplicate
Trichloroethene	32	<2	<2	<2	<2	2	4	<2	<2	<2
Trichlorofluoromethane	2000	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2,3-Trichloropropane	0.05	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2,4-Trimethylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,3,5-Trimethylbenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Vinyl chloride	0.2	<2	<2	<2	<2	<2	<2	<2	2	2
m&p-Xylene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
o-Xylene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Total Xylenes	14000	ND	ND	ND	ND	ND	ND	ND	ND	ND
Semi-Volatile Organic Compounds (ug/l)										
Acenaphthene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Acenaphthylene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Aniline	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Anthracene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Azobenzene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzidine	---	<20J	<20R	<20J	<20J	<20J	<20J	<20J	<20J	<20J
Benzo(a)anthracene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(a)pyrene	0.05	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(b)fluoranthene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(g,h,i)perylene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Benzo(k)fluoranthene	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzoic acid	---	<10J	<10	<10	<10	<10R	<10R	<10R	<10	<10
Benzyl alcohol	---	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
bis(2-Chloroethoxy)methane	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Chloroethyl) ether	0.3	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Chloroisopropyl)ether	300	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Ethylhexyl) phthalate	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
4-Bromophenyl phenyl ether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Butylbenzyl phthalate	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Carbazole	---	<2	<2	<2	---	---	<2	<2	<2	<2
4-Chloro-3-methylphenol	---	<10J	<10	<10	<10	<10R	<10R	<10R	<10	<10
4-Chloroaniline	---	<2	<2	<2	---	---	<2	<2	<2	<2
2-Chloronaphthalene	---	<2	<2	<2	---	---	<2	<2	<2	<2
2-Chlorophenol	35	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
4-Chlorophenyl phenyl ether	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chrysene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Dibenzo(a,h)anthracene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Dibenzofuran	---	<2	<2	<2	---	---	<2	<2	<2	<2
3,3'-Dichlorobenzidine	---	<20	<20	<20	<20	<20	<20	<20	<20	<20
2,4-Dichlorophenol	21	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,6-Dichlorophenol	---	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
Diethyl phthalate	5000	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dimethyl phthalate	---	<2	<2	<2	<2	<2J	<2J	<2	<2	<2
2,4-Dimethylphenol	---	<5J	<5J	<5	<5	<5R	<5R	<5R	<5	<5
Di-n-butyl phthalate	700	<2	<2	<2	<2	<2	<2	<2	<2	<2
4,6-Dinitro-2-methylphenol	---	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,4-Dinitrophenol	14	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,4-Dinitrotoluene	0.5	<2	<2	<2	<2	<2	<2	<2	<2	<2
2,6-Dinitrotoluene	0.5	<2	<2	<2	<2	<2	<2	<2	<2	<2
Di-n-octyl-phthalate	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Fluoranthene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Fluorene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Hexachlorobenzene	0.2	<2	<2	<2	<2	<2	<2	<2	<2	<2
Hexachlorocyclopentadiene	50	<2	<2	<2	<2	<2	<2	<2	<2J	<2J
Hexachloroethane	7	<2	<2	<2	---	---	<2	<2	<2	<2
Indeno(1,2,3-cd)pyrene	---	<2	<2	<2	---	---	<2	<2	<2	<2
Isophorone	370	<2	<2	<2	---	---	<2	<2	<2	<2
2-Methylnaphthalene	---	<2	<2	<2	---	---	<2	<2	<2	<2
2-Methylphenol	---	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
3&4-Methylphenol	---	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2-Nitroaniline	---	<2	<2	<2	---	---	<2	<2	<2	<2
3-Nitroaniline	---	<2	<2	<2	---	---	<2	<2	<2	<2
4-Nitroaniline	---	<2	<2	<2	<2	<2	<2	<2	<2	<2
Nitrobenzene	3.5	<2	<2	<2	<2	<2	<2	<2	<2	<2

**Table 4-4
Woodard & Curran
Summary of Lancaster Street Groundwater Results
E.Perry Site, Portland, Maine**

	MEG	MW-11	MW-3	MW-3	MW-5	MW-6	MW-7	MW-8	MW-9	MW-9
		05/03/05 Primary	05/03/05 Primary	05/03/05 Duplicate	05/02/05 Primary	05/02/05 Primary	05/03/05 Primary	05/02/05 Primary	05/03/05 Primary	05/03/05 Duplicate
Trichloroethene	32	<2	<2	<2	<2	2	4	<2	<2	<2
Trichlorofluoromethane	2000	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2,3-Trichloropropane	0.05	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,2,4-Trimethylbenzene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
1,3,5-Trimethylbenzene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Vinyl chloride	0.2	<2	<2	<2	<2	<2	<2	<2	<2	<2
m&p-Xylene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
o-Xylene	--	<2	<2	<2	<2	<2	<2	<2	2	2
Total Xylenes	14000	ND	ND	ND	ND	ND	ND	ND	<2	<2
Semi-Volatile Organic Compounds (ug/l)										
Acenaphthene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Acenaphthylene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Aniline	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Anthracene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Azobenzene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzidine	--	<20J	<20R	<20J	<20J	<20J	<20J	<20J	<20J	<20J
Benzo(a)anthracene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(a)pyrene	0.05	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(b)fluoranthene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(g,h,i)perylene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzo(k)fluoranthene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Benzoic acid	--	<10J	<10	<10	<10	<10R	<10R	<10R	<10	<10
Benzyl alcohol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
bis(2-Chloroethoxy)methane	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Chloroethyl) ether	0.3	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Chloroisopropyl)ether	300	<2	<2	<2	<2	<2	<2	<2	<2	<2
bis(2-Ethylhexyl) phthalate	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
4-Bromophenyl phenyl ether	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Butylbenzyl phthalate	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Carbazole	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
4-Chloro-3-methylphenol	--	<10J	<10	<10	<10	<10R	<10R	<10R	<10	<10
4-Chloroaniline	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Chloronaphthalene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Chlorophenol	35	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
4-Chlorophenyl phenyl ether	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Chrysene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dibenzo(a,h)anthracene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dibenzofuran	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
3,3'-Dichlorobenzidine	--	<20	<20	<20	<20	<20	<20	<20	<20	<20
2,4-Dichlorophenol	21	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,6-Dichlorophenol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
Diethyl phthalate	5000	<2	<2	<2	<2	<2	<2	<2	<2	<2
Dimethyl phthalate	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
2,4-Dimethylphenol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
Di-n-butyl phthalate	700	<2	<2	<2	<2	<2	<2	<2	<2	<2
4,6-Dinitro-2-methylphenol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,4-Dinitrophenol	14	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2,4-Dinitrotoluene	0.5	<2	<2	<2	<2	<2	<2	<2	<2	<2
2,6-Dinitrotoluene	0.5	<2	<2	<2	<2	<2	<2	<2	<2	<2
Di-n-octyl-phthalate	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Fluoranthene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Fluorene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Hexachlorobenzene	0.2	<2	<2	<2	<2	<2	<2	<2	<2	<2
Hexachlorocyclopentadiene	50	<2	<2	<2	<2	<2	<2	<2	<2	<2
Hexachloroethane	7	<2	<2	<2	<2	<2	<2	<2	<2	<2
Indeno(1,2,3-cd)pyrene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Isophorone	370	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Methylnaphthalene	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
2-Methylphenol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
3&4-Methylphenol	--	<5J	<5	<5	<5	<5R	<5R	<5R	<5	<5
2-Nitroaniline	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
3-Nitroaniline	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
4-Nitroaniline	--	<2	<2	<2	<2	<2	<2	<2	<2	<2
Nitrobenzene	3.5	<2	<2	<2	<2	<2	<2	<2	<2	<2

Attachment D: Site Screening Photographs

**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

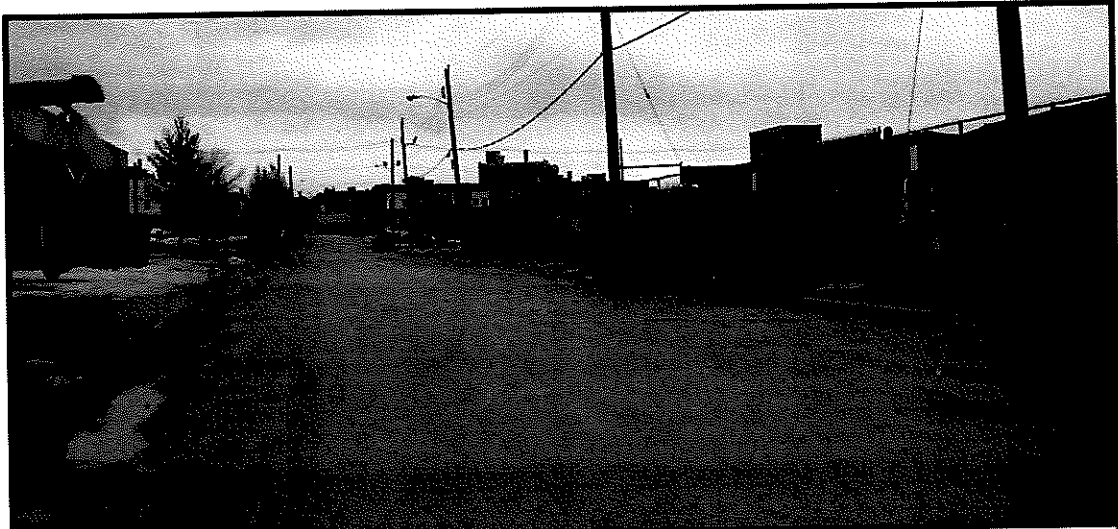
Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

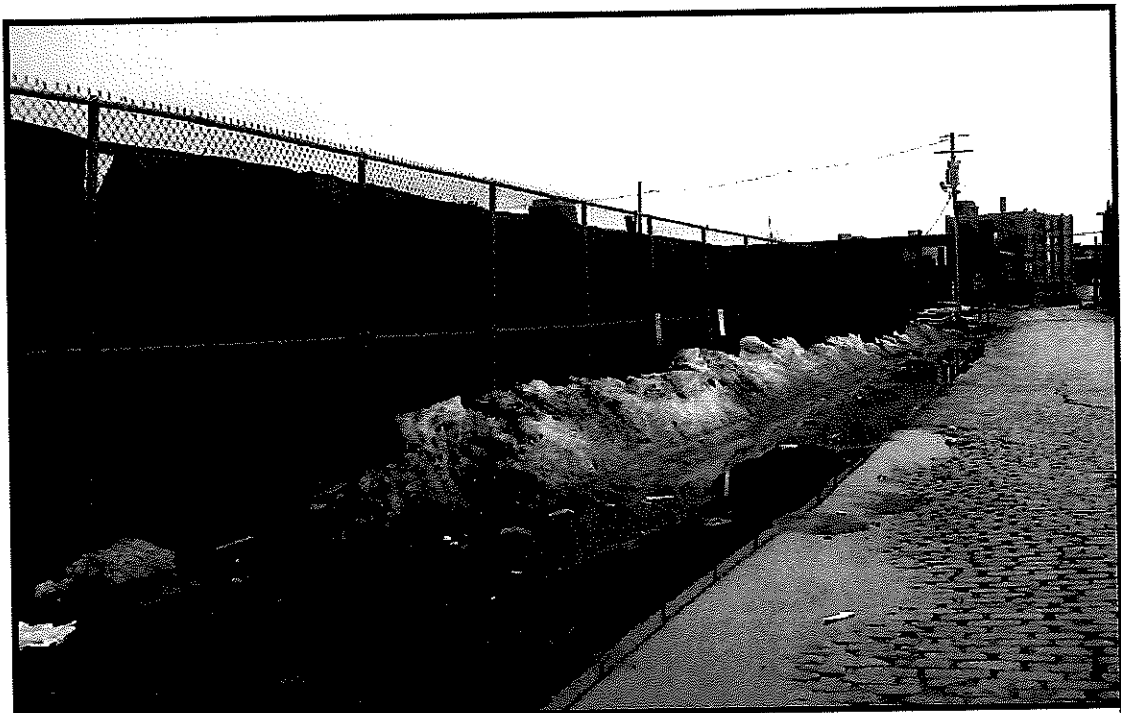
Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101





Photograph 1: Screening, Lancaster Street Property. Looking West along Lancaster Street.

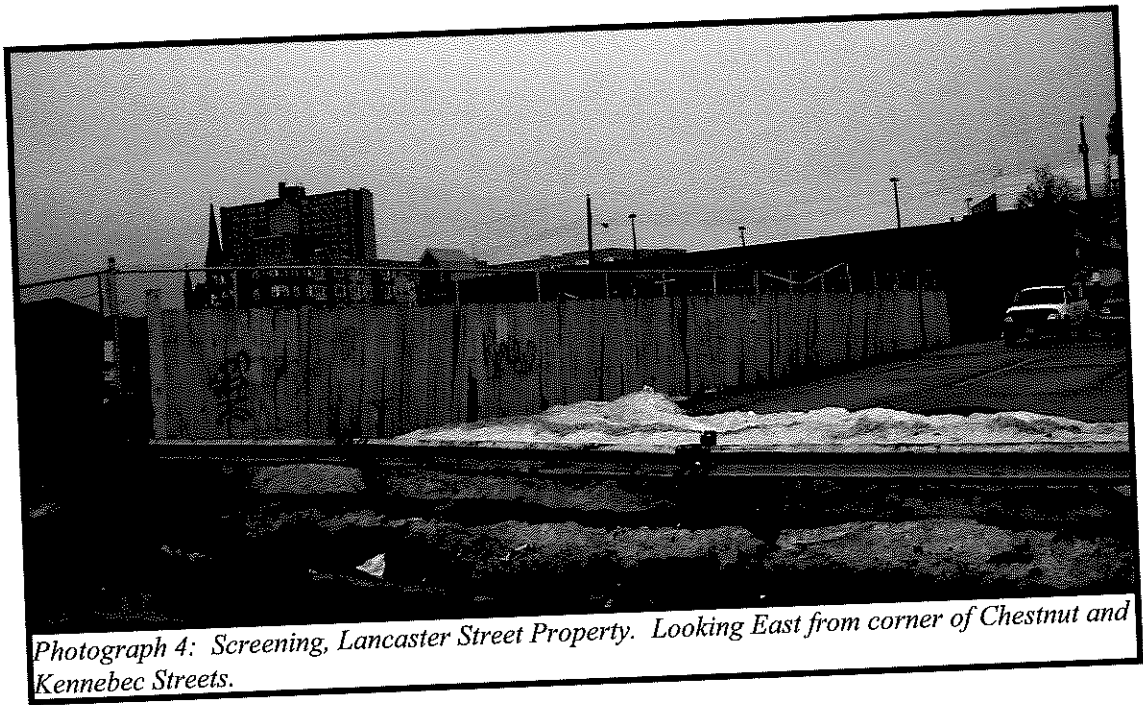


Photograph 2: Screening, Lancaster Street Property. Looking West along Kennebec Street.

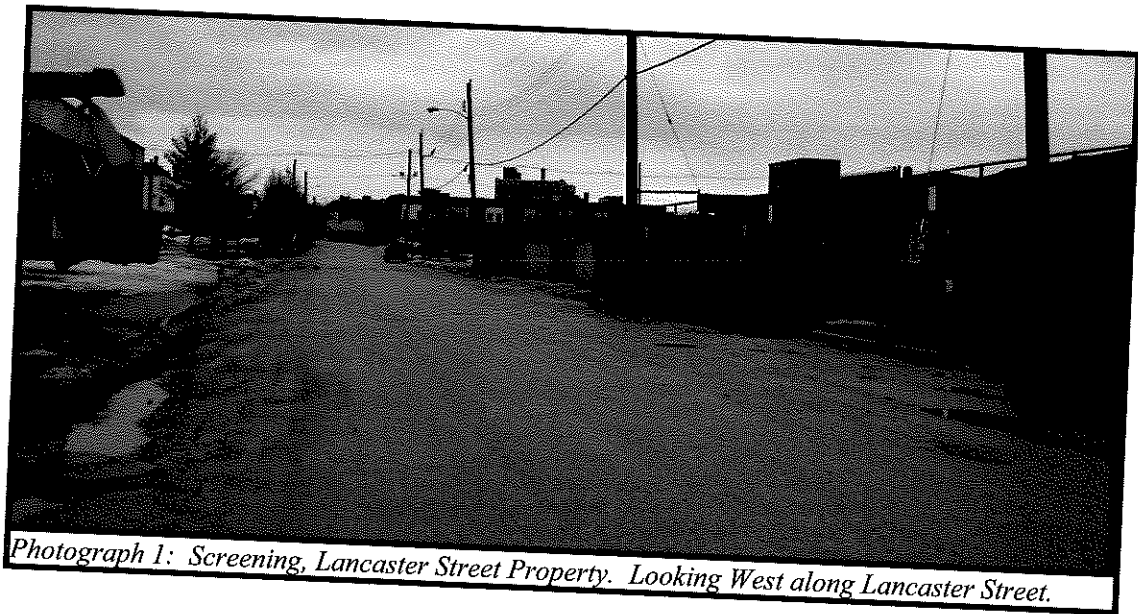




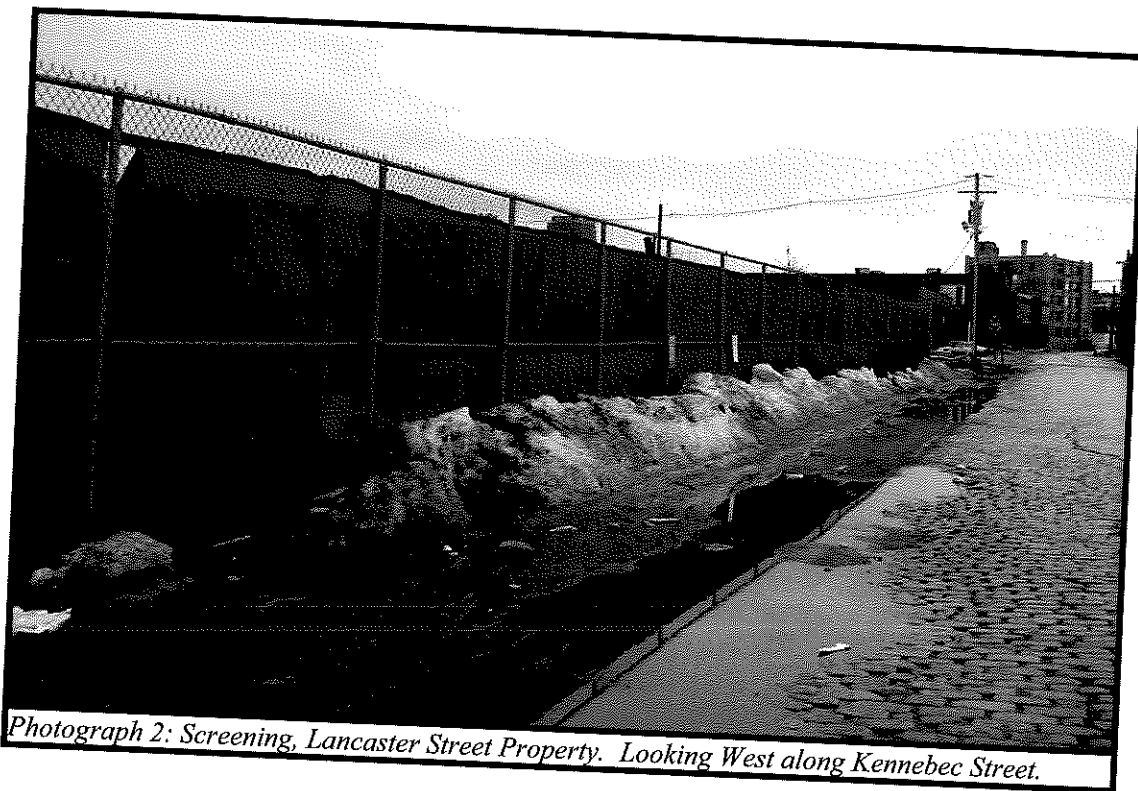
Photograph 3: Screening, Lancaster Street Property. Screening along Pearl Street.



Photograph 4: Screening, Lancaster Street Property. Looking East from corner of Chestnut and Kennebec Streets.



Photograph 1: Screening, Lancaster Street Property. Looking West along Lancaster Street.



Photograph 2: Screening, Lancaster Street Property. Looking West along Kennebec Street.

Attachment E: Types of Metals Processed

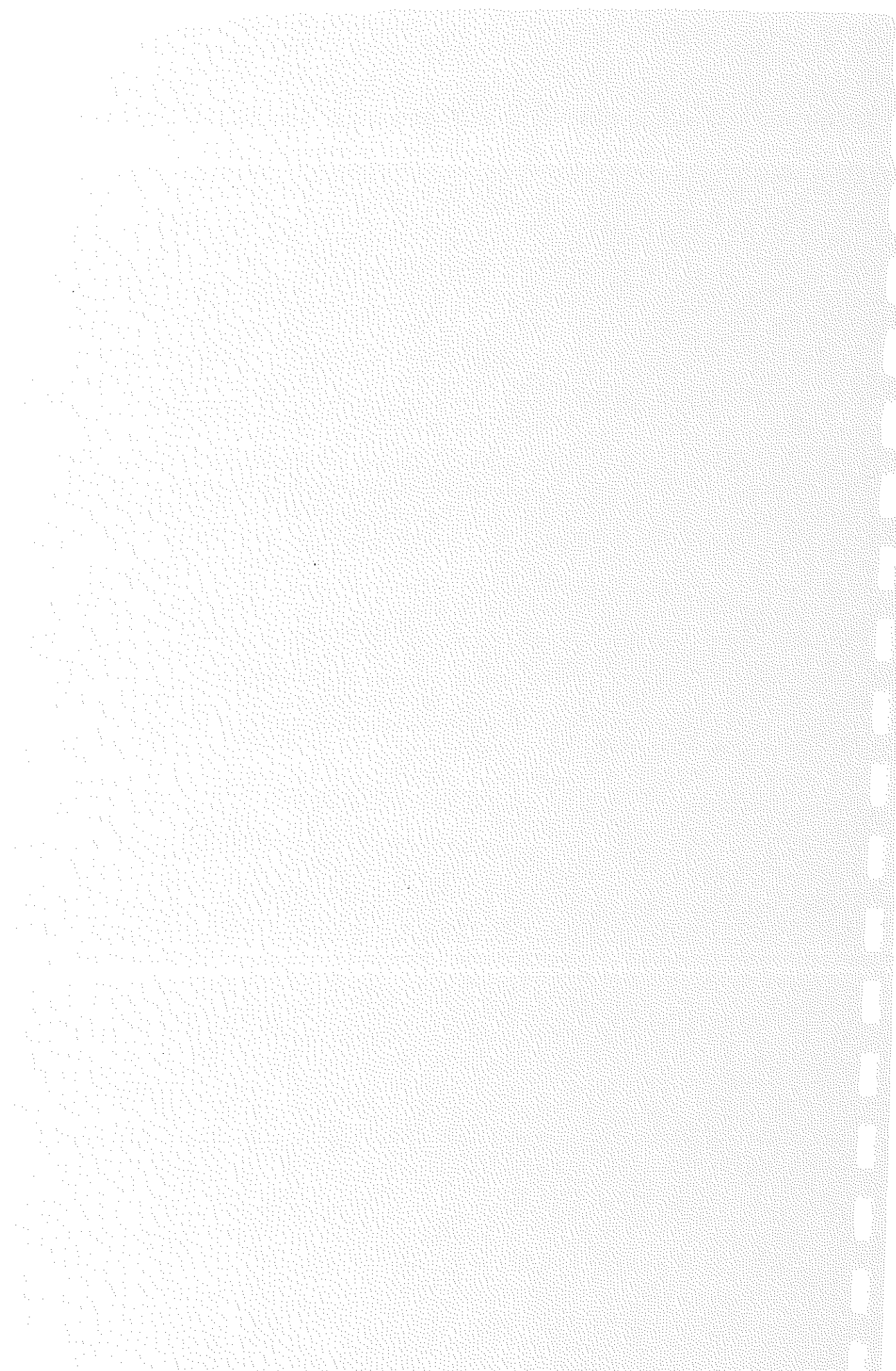
**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



SOLD MATERIAL RECORD YEAR TO DATE	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	YEAR TO DATE TOTALS
2007						389							1,052
A-286	663												350,030
ALUMINUM, CAST	17,800	29,200	23,120	20,950	61,710	25,460	55,860	29,380	34,030	32,780	29,740		19,077
ALUMINUM, E.C. WIRE	2,950			2,061		1,164	4,812						230,793
ALUMINUM, EXTRUSION	62,661	9,100	28,810		12,299	10,300	21,119	21,211	10,992	26,116	8,185		181,442
ALUMINUM, 6061 EXTRUSION	21,843				24,611		38,493		27,001		69,394		605,750
ALUMINUM, IRONY		37,200		57,400	86,480	42,930	41,320	35,860	49,390	71,430		83,760	60,186
ALUMINUM, LITHO	5,640		12,320		11,904		13,489			16,343			108,720
ALUMINUM, MLC	19,690		18,030		16,289		39,393		15,318			41,474	1,051,149
ALUMINUM, OLD	66,863	75,570	58,880	40,700	117,925	121,900	136,140	75,422	125,418	96,765	94,092		31,276
ALUMINUM, REMELT	20,076			4,795					6,435				96,097
ALUMINUM, SIDING	13,864		11,400		11,477				26,773	32,583			11,667
ALUMINUM, UBC		1,817		1,580		3,980	776	2,414	1,100				547,613
ALUMINUM, WHEELS	192,009	30,700	39,500	41,902	40,877	30,218	64,927	80,570	41,088		46,422		813,171
BATTERIES, AUTO	39,900	125,500		40,922	126,561	79,492	73,848	58,650	76,485	68,713	36,200	86,900	93,947
BATTERIES, INDUSTRIAL	3,340			1,728		3,817	9,339	12,760	7,273	15,850	2,900	36,940	8,921
BRASS, PIPE						8,921							6,844
BRASS, ROD	3,610					3,234							304,481
BRASS, YELLOW	53,627		36,890	93,395	34,396		9,410	49,161	250	45,622	35,730		2,956
CARBIDE			417			-1,017		278		1,243			206,279
COMPOSITION	46,066		25,360	17,931		47,498	3,701	30,206	27,723	7,795			358,331
COPPER, #1	102,570	42,860	30,161		39,441	42,018	40,078	40,329		20,882			403,375
COPPER, #2	110,474		29,212	40,342		70,075	24,624	26,021	36,344	66,283		40,048	559,414
COPPER, BARE BRITE	154,266	34,617	8,787	73,625	40,483	98,398	37,454	40,917		8,531			13,548
COPPER, LEADED LITE						2,556			7,527	1,997	10,333		61,991
COPPER, LITE	16,459		11,700	3,195		10,880							1,813
CU-NI, 70/30	777	960				676							1,993
CU-NI, 90/10			928					1,065					232
HASTEALLOY	50	182					1,551		715	1,120			6,608
HEATER CORES	430	1,580		1,212									2,488
INCONEL	624	664				684	616						82,417
INSULATED WIRE, ACSR		10,000	5,140	8,556	7,680	9,200	8,334		12,487	9,910	6,290	4,820	138,449
INSULATED WIRE, #1 COPPER		3,400						58,415	76,104	780	750		657,461
INSULATED WIRE, #2 COPPER	39,420	36,950	37,870	46,104	102,390	114,846	99,756	5,090	8,445	73,750	65,000	33,840	79,075
LEAD, REGULAR	14,830	3,908	7,080	13,461	2,795		4,708	6,970	3,250	10,866	12,415		22,240
LEAD, WEIGHTS	2,977							4,470		4,276	6,651	3,866	3,902
MONEL	1,180	1,106	320			1,346							4,454
NICKEL	1,202	963				1,256	1,034						130
PEWTER			130								33,987		117,665
RADIATORS, ALUMINUM		36,350		30,285	5,920		11,173						226,170
RADIATORS, AUTO	31,170	40,380	14,872	19,198		36,741	29,945	9,568	10,650	33,668			800
RADIATORS, AUTO - DIRTY				800									89,081
RADIATORS, COPPER/ALUMINUM FINS	1,643	8,770		8,949	17,112	5,060	7,450	4,610	12,567	12,860	6,160	3,900	13,956
STAINLESS STEEL, 17-4		1,416		5,400									442,943
STAINLESS STEEL, 304	95,430	60,430	51,060	47,500	103,082	50,600	5,866	12,655	4,550	6,380	5,570		45,527
STAINLESS STEEL, 316	3,435		13,760	5,852	3,885	8,802	3,825	1,783	2,805		2,080		22,328
STAINLESS STEEL, P-530	8,452	9,720					516			2,640			4,211,132
STEEL, #1	308,340	79,740	313,880	227,900	347,740	435,284	516,210	532,250	338,010	384,960	387,598	339,220	
STEEL/IRON, CAST													
STEEL, ELECTRIC MOTORS	3,603	61,440		57,390	81,390			11,200	67,250	92,950	11,100		316,320
STEEL, LITE	213,790	97,900	123,260	184,970	179,640	256,880	52,400	232,160	286,350	211,360	274,260	169,320	2,232,280
STEEL, P&S		51,120	72,940	66,320	39,100	115,660	210,060	37,280	41,080	85,390		87,080	826,630
TIN			1,253										1,297
TITANIUM	1,297									1,200			10,400
TURNINGS, A-286	2,857	2,530	704			1,804	1,305						149,249
TURNINGS, ALUMINUM	8,120	34,600	3,420	40,250	3,962	3,917	25,900		29,080			8,180	25,824
TURNINGS, BRASS	6,202			9,892				1,550					48,000
TURNINGS, ROD BRASS	20,600					27,500							12,241
TURNINGS, COPPER	970		920					9,961	370				4,074
TURNINGS, CU-NI - 70/30	1,200					1,324				1,550			
TURNINGS, CU-NI - 90/10													3,462
TURNINGS, HASTEALLOY										2,966			16,886
TURNINGS, INCONEL	314	182								5,560			13,908
TURNINGS, MONEL	1,890	3,713				5,187	1,036			1,610			13,149
TURNINGS, NICKEL	3,757	5,453	1,800			833	455			2,889			8,007
TURNINGS, Ni-TI	3,526	824				1,165	4,745			1,710			5,314
TURNINGS, STAINLESS STEEL - 13-8	1,644	1,240	670			915	760			2,175			143,593
TURNINGS, STAINLESS STEEL - 17-4		808	656					8,220	25,525	14,874	3,100	3,559	129,002
TURNINGS, STAINLESS STEEL - 304	28,875	15,560	11,980	15,250	16,760		5,017	40,446	4,043	35,900	5,520		134,332
TURNINGS, STAINLESS STEEL - 316	15,390	7,330	4,660	8,176			9,406	18,087	16,979	11,910	11,325	7,674	151,451
TURNINGS, STAINLESS STEEL - P-530	24,686	5,060	6,880	18,374	9,971		32,349	14,385	10,020		2,520		295,400
TURNINGS, STEEL	46,590	6,820	11,610	13,820	11,937			109,900			43,940		14,282
TURNINGS, TITANIUM	4,202	1,470				3,668	3,769	493		680		1,620	23,149
ZINC		3,024			2,100	1,315		8,500	5,590				

METALS RECEIVED AT E. PERRY IRON & METAL, 2007

(quantities in pounds)



SOLD MATERIAL RECORD YEAR TO DATE 2007	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	YEAR TO DATE TOTALS
A-288	663					389							
ALUMINUM, CAST	17,800	20,200	23,120	20,950	61,710	25,460	55,880	29,380	34,030	32,780	28,740		1,052
ALUMINUM, E.C. WIRE	2,050			2,081		1,154	4,812						350,030
ALUMINUM, EXTRUSION	82,661	9,100	28,810		12,299	10,300	21,119	21,211	10,992	26,116	8,185		10,077
ALUMINUM, 6061 EXTRUSION	21,943				24,611		38,493		27,001				230,793
ALUMINUM, LITHO		37,200		57,400	88,460	42,930	41,320	35,860	49,390	71,430	69,394		181,442
ALUMINUM, MLC	19,690		12,920		11,904		13,489			16,343		83,760	505,750
ALUMINUM, OLD	66,863	75,570	58,880	40,700	16,289		39,993		15,318				60,196
ALUMINUM, REMELT	20,076			4,765	117,925	121,900	136,140	75,422	125,418	96,785	94,082	41,474	108,720
ALUMINUM, SIDING	13,864		11,400						6,435				1,051,149
ALUMINUM, UBC		1,817		11,477					26,773	32,583			31,276
ALUMINUM, WHEELS	132,009	30,700	39,500	1,580	3,980	776	2,414	1,100					96,097
BATTERIES, AUTO	39,900	125,500		41,302	40,877	30,218	64,927	80,570	41,088				11,667
BATTERIES, INDUSTRIAL	3,340			40,922	126,561	79,492	73,848	58,650	75,485		46,422		547,613
BRASS, PIPE				1,728		3,817	9,339	12,760	7,273	15,850	2,900	86,900	813,171
BRASS, ROD	3,610					8,921						36,940	93,847
BRASS, YELLOW	53,627		36,890	39,396	34,396	3,234							8,821
CARBIDE			417				9,410	49,161	250	45,622	35,730		6,844
COMPOSITION	46,065		25,360	17,931		1,017		278		1,243			304,481
COPPER, #1	102,570	42,860	30,161		47,498	3,701	30,208	27,729	7,795				2,955
COPPER, #2	110,474		29,212	40,342	39,441	42,010	40,078	40,329	20,882				206,279
COPPER, BARE BRITE	154,206	34,617	8,787	73,825	40,493	38,398	37,454	40,917	68,283				358,331
COPPER, LEADED LITE						2,556			90,871	40,048			403,376
COPPER, LITE	16,459		11,700	3,195		10,680		7,527	2,461	8,531			13,548
CU-NI, 70/30	777	380				676			1,997	10,333			61,891
CU-NI, 90/10			928					1,065					1,813
HASTEALLOY	50	182											1,993
HEATER CORES	430	1,580		1,212			1,551		715	1,120			232
INCONEL	624	664				684	516						6,608
INSULATED WIRE, ACSR		10,000	5,140	6,556	7,680	9,200	8,334		12,487	9,910	6,290	4,820	2,488
INSULATED WIRE, #1 COPPER		3,400											82,417
INSULATED WIRE, #2 COPPER	33,420	36,850	37,870	46,104	102,390	114,846	99,756	58,415	75,104	780	750		138,449
LEAD, REGULAR	14,630	3,900	7,080	13,461	2,795		4,708	5,970	3,250	10,866	12,415	33,840	657,461
LEAD, WEIGHTS	2,977							4,470		4,276	6,651	3,866	79,075
MONEL	1,130	1,106	320			1,346							22,240
NICKEL	1,202	963				1,255	1,094						3,902
PEWTER			130										4,454
RADIATORS, ALUMINUM		36,350		30,235	5,920		11,173						130
RADIATORS, AUTO	31,170	40,360	14,872	18,196		36,741	29,945	9,568	10,650	33,688	33,987		117,665
RADIATORS, AUTO - DIRTY					800								226,170
RADIATORS, COPPER/ALUMINUM FINS	1,643	8,770		8,948	17,112	5,060	7,450	4,610	12,567	12,860	6,160	3,900	900
STAINLESS STEEL, 17-4		1,416			5,400					7,140			89,081
STAINLESS STEEL, 304	95,490	60,430	51,089	47,500	103,082	50,600	5,666	12,655	4,550	6,380	5,570		13,956
STAINLESS STEEL, 316	3,435		13,760	5,352	3,885	8,802	3,825	1,783	2,605		2,080		442,843
STAINLESS STEEL, P-530	3,452	9,720					516						45,527
STEEL, #1	309,340	79,740	313,880	227,900	347,740	435,284	516,210	532,250	338,010	384,960	387,598	339,220	22,328
STEEL/IRON, CAST													4,211,132
STEEL, ELECTRIC MOTORS	3,800	61,440		57,390	81,390			11,200	57,250	32,950	11,100		316,320
STEEL, LITE	213,780	97,900	123,260	184,970	179,640	256,880	52,400	232,160	236,350	211,360	274,260	169,320	2,232,290
STEEL, P&S		51,120	72,940	86,920	39,100	115,660	210,060	37,280	41,080	85,390		87,080	826,630
TIN			1,253										1,253
TITANIUM	1,297												1,297
TURNINGS, A-288	2,857	2,530	704			1,804	1,305						10,400
TURNINGS, ALUMINUM	8,120	34,600	3,420	40,250	3,962	3,917	25,900		29,080	1,200			149,249
TURNINGS, BRASS	6,202												25,624
TURNINGS, ROD BRASS	20,500			9,892				1,550			8,180		48,000
TURNINGS, COPPER	970		920			27,500							12,241
TURNINGS, CU-NI - 70/30	1,200					1,324		9,981	370				4,074
TURNINGS, CU-NI - 90/10										1,550			
TURNINGS, HASTALLOY	314	182											3,482
TURNINGS, INCONEL	1,390	3,713				5,187	1,038			2,966			16,886
TURNINGS, MONEL	3,757	5,453	1,800			833	455			1,610			13,908
TURNINGS, NICKEL	3,526	824				1,165	4,745			2,889			13,149
TURNINGS, NI-TI	1,644	1,240	670			1,570	1,173			1,710			8,007
TURNINGS, STAINLESS STEEL - 13-8		808	656			915	760			2,175			5,314
TURNINGS, STAINLESS STEEL - 17-4	28,875	15,550	11,980	15,250	16,760	8,220	25,625	14,874	3,100	3,559			143,693
TURNINGS, STAINLESS STEEL - 304	15,390	7,330	4,660	8,176		5,917	40,446	4,043	35,900	2,620	5,520		129,002
TURNINGS, STAINLESS STEEL - 316	24,886	5,060	6,660	18,374	3,971	9,496	18,087	16,979	11,910	11,325	7,674		134,332
TURNINGS, STAINLESS STEEL - P-530	49,590	6,820	11,610	13,820	11,337		32,349	14,386	10,020		2,520		151,451
TURNINGS, STEEL			53,620	48,000	39,840			493			43,940		295,300
TURNINGS, TITANIUM	4,202	1,470				3,668	3,769						14,282
ZINC		3,024			2,100	1,315		8,500	5,590	680		1,620	23,149

METALS RECEIVED AT E. PERRY IRON & METAL, 2007

(quantities in pounds)

Attachment F: Waste Management Compliance Audit

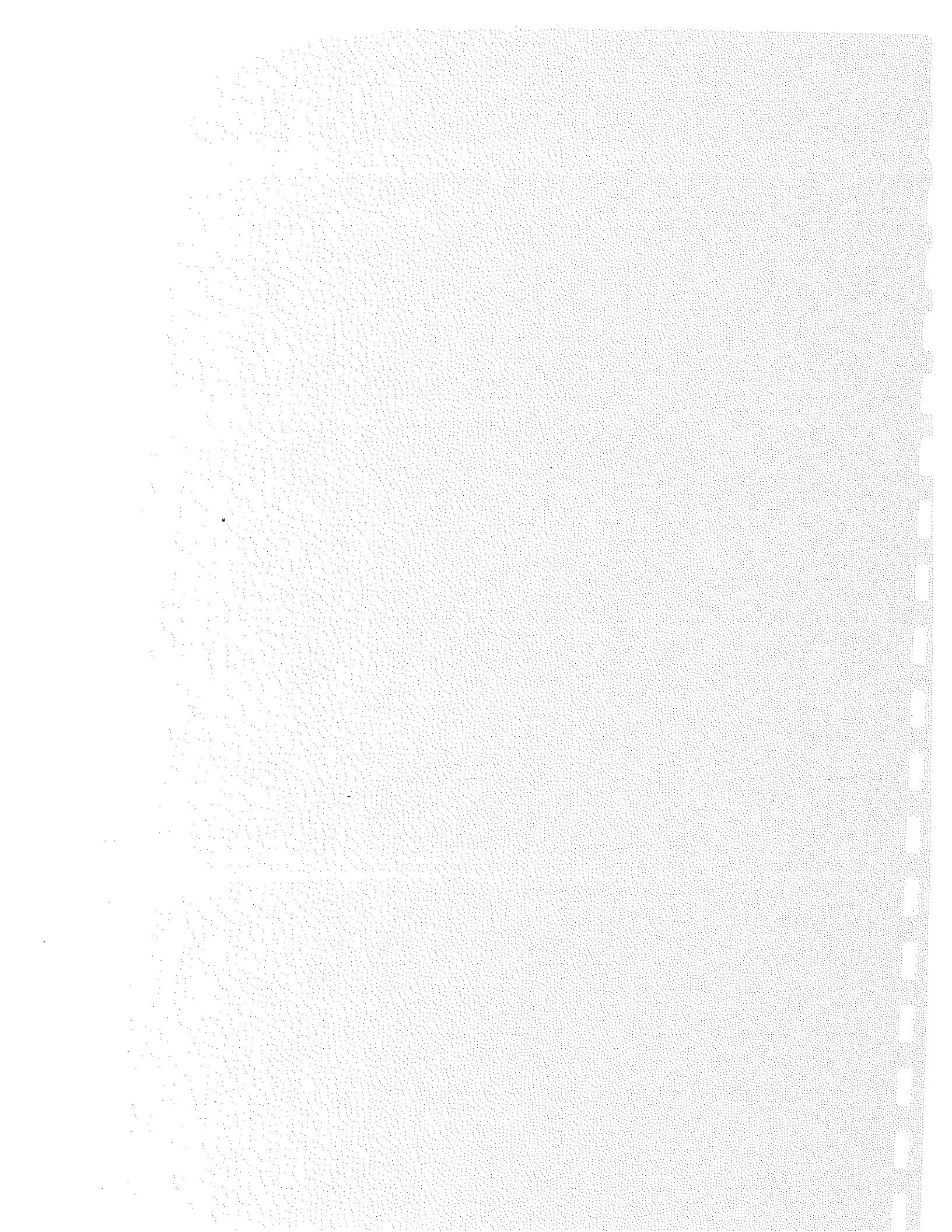
**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



April 11, 2008

Mr. Alan Lerman
E. Perry Iron & Metal
115 Lancaster Street
Portland, ME 04101

Re: Waste Management Compliance Audit

Dear Mr. Lerman:

Acadia Environmental Technology (Acadia) has conducted a waste management compliance audit of your scrap metal recycling business as required under the City of Portland Code of Ordinances, Ch. 31. This report describes the scope of this audit and presents its findings.

SCOPE AND PURPOSE

Rule #2 developed by the City of Portland under the Code of Ordinances, Ch. 31 Scrap Metal Recycling Facilities, lists several requirements for scrap metal recycling facilities including an, "Initial baseline evaluation of the scrap metal recycling facility requires a waste management compliance audit of the facility..". The purpose of this report is to fulfill this requirement.

Since the Ordinance defines "waste" as,

"hazardous waste as defined or identified in Chapter 850, oily waste, as defined or identified in Chapter 405, Sec. 6(c) (3), special waste as defined or identified in Chapter 405, Sec. 6, and universal waste as defined in Chapter 850, Sec. 3A (13) of the Regulations of the Maine Department of Environmental Protection...."

the audit, whose results are presented herein, was performed primarily to address the waste types defined by the referenced rules. However, some related Maine DEP regulatory requirements, such as solid waste facility licensing and oil and hazardous materials spills and releases are also addressed.

The results of the waste management compliance audit are presented below and are based on a site visit by Acadia Senior Environmental Engineer, Mark Arienti to inspect facility operations and activities, interview key personnel, and review records pertaining to waste generation and management. Maine Department of Environmental Protection (ME DEP) personnel were contacted with regard to facility licensing pertaining to waste

management, and manifests and oil and hazardous spill records were also reviewed as part of this audit.

Mr. Arienti is a Registered Professional Engineer in Maine and has been working in the waste management field for 20 years.

SITE DESCRIPTION AND FEATURES

E. Perry's Facility includes two site properties: one at 9 Somerset Street (Somerset St. Site) and 115 Lancaster Street (Lancaster St. Site) in Portland, Maine. The properties are located in the downtown "Bayside" area of Portland. The smaller of the two properties is the Somerset Street site, which is less than one acre. Bordering this parcel to the northeast is a vacant field, to the northwest is railroad tracks, to the southwest is a scrap metal yard (different ownership), and to the southeast by Somerset Street. The property has a fence on all sides and two locking gates on Somerset Street. There is one small building on the eastern corner of the parcel, which functions as a small office and work shop. The rest of the parcel is open with several parked semi-truck trailers. The property is paved with a loading ramp facing the railroad tracks in the western corner of the parcel.

The Lancaster Street Site is approximately 1.75 acres in size and occupies one city block. The streets bordering the property are Pearl Street to the northeast, Kennebec Street to the northwest, Chestnut Street to the southwest, and Lancaster Street to the southeast. The property has a building on the eastern corner of the premises, which consists of a small office, entrance gate, and truck scale for the scrap metal yard. The rest of the parcel is open with several sorted piles of various scrap metal. There is a road or path through the parcel that is used by Site cranes and trucks delivering materials to the facility.

Physical Setting: Site topography at both locations is relatively level, with regional topography sloping toward Portland's Back Cove, which lies approximately 1,300 feet to the northwest. The Site has approximately 3.5 to 11 feet of fill over marine sediments. The Site is approximately 9 feet above mean sea level.

Site History and Land Use: The site was originally an historic reclaimed area (filled wetland/surface water) and has been used as a scrap metal salvage yard since 1896.

Adjacent Property Land Use: The properties adjacent to both parcels consist of industrial and commercial properties.

FACILITY OPERATIONS

E. Perry Iron & Metal Co., Inc. was established in 1896 by Eli Perry and they've been operating at the Lancaster Street location since that time. They provide scrap metal recycling services to the municipal, commercial, industrial, and private sectors.

Services include on-site container services as well as receiving scrap metals for recycling at their Lancaster Street location. They provide scheduled removal of scrap metals for some industrial and commercial customers.

April 11, 2008

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E. Perry Iron & Metal
115 Lancaster Street
Portland, ME 04101

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"hazardous waste as defined or identified in Chapter 850, oily waste, as defined or identified in Chapter 405, Sec. 6(c) (3), special waste as defined or identified in Chapter 405, Sec. 6, and universal waste as defined in Chapter 850, Sec. 3A (13) of the Regulations of the Maine Department of Environmental Protection...."

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The results of the waste management compliance audit are presented below and are based on a site visit by Acadia Senior Environmental Engineer, Mark Arienti to inspect facility operations and activities, interview key personnel, and review records pertaining to waste generation and management. Maine Department of Environmental Protection (ME DEP) personnel were contacted with regard to facility licensing pertaining to waste

E. Perry's Somerset Street facility includes a concrete pad from which aluminum turnings are loaded into trailers for off-site shipment. This property includes a small building used as an office and workshop for performing minor equipment maintenance and repair. Empty barrels are also stored here for use at the Lancaster Street site for shipping turnings and other small metal pieces. There is a variety of old pieces of metal equipment and parts stored next to the maintenance shop building.

E. Perry buys ferrous and non-ferrous scrap metals including aluminum, brass, bronze, copper, lead, auto batteries, stainless steel, cast iron, steel, insulated copper & aluminum wire, radiators, alloys, nickel, catalytic converters, and zinc. The total quantity of metals received and recycled in 2007 is included as Attachment 1.

E. Perry does not accept appliances (refrigerators, dryers, stoves, etc.), motor vehicles, closed tanks, or cylinders. However, they do accept tanks and cylinders that have been cut in half and cleaned. E. Perry also does not accept any liquid, chemical, or hazardous materials of any kind. A detailed list of prohibited items is included as Attachment 2. This list is provided to all customers and is posted at the facility entrance where delivery trucks are weighed in.

Materials Receiving and Handling

As stated above, E. Perry buys ferrous and non-ferrous scrap metals including aluminum, brass, bronze, copper, lead, auto batteries, stainless steel, cast iron, steel, insulated copper & aluminum wire, radiators, alloys, nickel, catalytic converters, and zinc. The metals are dropped off by industrial, commercial and residential customers and then sorted, baled and/or boxed and shipped off-site for resale to secondary markets.

E. Perry receives scrap metal at the Lancaster Street site via one of three entrances (see Figure 1). Upon receipt the material is weighed and then placed in the appropriate area. The primary scale is located next to the office at the Lancaster Street receiving entrance; loads of small pieces of non-ferrous metals, generally shipped in Gaylord boxes (sometimes steel barrels) are received and weighed inside.

Larger pieces of steel as well as steel turnings are received in the main yard area as indicated in Figure 1. Some, but not all, aluminum as well as copper wire is received and baled by either the horizontal or vertical balers located under an overhang in the building. Baled wire and aluminum are stacked along the fenceline adjacent to Kennebec St. in the northeastern end of the site. Machine shop turnings (steel, bronze, brass, copper, and titanium) are collected in Gaylord boxes or steel barrels, which are then stored in the warehouse or sometimes, when this area is full, in shipping containers just off the southwest end of the building along Lancaster Street.

Lead-acid automobile batteries are received and placed in heavy-duty Gaylord boxes on pallets in a room adjacent to the scale. Once the pallet is full, it is taken out to an enclosed shipping container that is located along the fence line on the Lancaster Street side toward the southwest end of the site.

The Somerset St. site is used for shipping out loads of aluminum turnings. The aluminum turnings are received on the elevated concrete pad and then loaded into the trailers for shipment off site.

According to E. Perry personnel, no other metals-handling operations are conducted on the Somerset Street site.

WASTE GENERATION

E. Perry is a recycling facility, not a waste disposal nor a waste transfer facility. Waste of any kind generated by E. Perry is very minimal and limited to office and packaging rubbish. This waste is placed in one of two 10-yard dumpsters, which are picked up daily by Carey Rubbish Removal.

As stated above, the City of Portland, Code of Ordinances, Section 31-4, defines *waste* as including:

- hazardous waste (ME DEP Chapter 850);
- oily waste (ME DEP Chapter 405, Sec. 6(c) (3));
- special waste (ME DEP Chapter 405, Sec. 6) and
- Universal waste (ME DEP Chapter 850; and Sec. 3A (13)).

The generation of each of these types of waste at E. Perry is described below.

Hazardous Waste: Acadia did not observe any hazardous waste as defined under Maine's *Identification of Hazardous Wastes* rule, 06-096 CMR 850 in its inspection of E. Perry's facility, nor were any records found from the past 10 years that indicated hazardous waste had been generated during this time. Based on the type of materials received and the types of operations performed at the facility, Acadia would not expect hazardous waste to be generated under normal conditions.

As indicated in Attachment 2, E. Perry does not accept hazardous materials or hazardous wastes. E. Perry communicates this policy to its customers and also inspects every load to confirm that prohibited materials are not accepted. If a hazardous item is inadvertently received at the facility, E. Perry will contact a hazardous waste contractor to properly handle and dispose of the item.

Universal Waste: E. Perry uses fluorescent lamps in its office and warehouse areas. Acadia observed an area adjacent to the main office with a sign on the wall indicating Universal Waste Storage Area. A cardboard barrel was observed in this area labeled "Universal Waste Lamps". E. Perry indicated that when a fluorescent lamp "burns out", it is placed in a cardboard container (the same kind as the ones new bulbs are packaged in), and the box is placed in this designated area until full, at which time the box is sealed and transported to the City of Portland Riverside Recycling Center, which provides for recycling of used lamps according to Maine Hazardous Waste Regulations.

E. Perry's Somerset Street facility includes a concrete pad from which aluminum turnings are loaded into trailers for off-site shipment. This property includes a small building used as an office and workshop for performing minor equipment maintenance and repair. Empty barrels are also stored here for use at the Lancaster Street site for shipping turnings and other small metal pieces. There is a variety of old pieces of metal equipment and parts stored next to the maintenance shop building.

E. Perry buys ferrous and non-ferrous scrap metals including aluminum, brass, bronze, copper, lead, auto batteries, stainless steel, cast iron, steel, insulated copper & aluminum wire, radiators, alloys, nickel, catalytic converters, and zinc. The total quantity of metals received and recycled in 2007 is included as Attachment 1.

E. Perry does not accept appliances (refrigerators, dryers, stoves, etc.), motor vehicles, closed tanks, or cylinders. However, they do accept tanks and cylinders that have been cut in half and cleaned. E. Perry also does not accept any liquid, chemical, or hazardous materials of any kind. A detailed list of prohibited items is included as Attachment 2. This list is provided to all customers and is posted at the facility entrance where delivery trucks are weighed in.

Materials Receiving and Handling

As stated above, E. Perry buys ferrous and non-ferrous scrap metals including aluminum, brass, bronze, copper, lead, auto batteries, stainless steel, cast iron, steel, insulated copper & aluminum wire, radiators, alloys, nickel, catalytic converters, and zinc. The metals are dropped off by industrial, commercial and residential customers and then sorted, baled and/or boxed and shipped off-site for resale to secondary markets.

E. Perry receives scrap metal at the Lancaster Street site via one of three entrances (see Figure 1). Upon receipt the material is weighed and then placed in the appropriate area. The primary scale is located next to the office at the Lancaster Street receiving entrance; loads of small pieces of non-ferrous metals, generally shipped in Gaylord boxes (sometimes steel barrels) are received and weighed inside.

Larger pieces of steel as well as steel turnings are received in the main yard area as indicated in Figure 1. Some, but not all, aluminum as well as copper wire is received and baled by either the horizontal or vertical balers located under an overhang in the building. Baled wire and aluminum are stacked along the fenceline adjacent to Kennebec St. in the northeastern end of the site. Machine shop turnings (steel, bronze, brass, copper, and titanium) are collected in Gaylord boxes or steel barrels, which are then stored in the warehouse or sometimes, when this area is full, in shipping containers just off the southwest end of the building along Lancaster Street.

Lead-acid automobile batteries are received and placed in heavy-duty Gaylord boxes on pallets in a room adjacent to the scale. Once the pallet is full, it is taken out to an enclosed shipping container that is located along the fence line on the Lancaster Street side toward the southwest end of the site.

The source of the used bulbs at E. Perry is overhead lighting in the office and warehouse area. They don't receive used lamps or any other Universal Waste from customers. Acadia also did not observe any evidence or obtain any records that indicated that E. Perry generates other types of Universal Waste. Since the total number of used bulbs accumulated by E. Perry is well below the 200 threshold at any one time, E. Perry qualifies for the Reduced Requirements for Small Universal Waste Generators, which are summarized in Attachment 3.

Oily Waste:

E. Perry generates approximately one to two 55-gallon drums of oily waste annually as a result of performing oil changes on equipment such as the cranes and the baling machines. This oil is collected in an empty barrel, and sent to 3G's Tire and Auto Center on Fox St. in Portland where it is used as fuel to power their *Clean Burn* waste oil furnace.

Special Waste: City of Portland, Code of Ordinances, Section 31-4 references 06 CMR 405 for the definition of Special Waste, but the actual definition is presented in 06-096 CMR 850 (Maine's *Identification of Hazardous Wastes* rule).

"Special waste," means any solid waste generated by sources other than household and typical commercial establishments that exists in such an unusual quantity or in such a chemical or physical state, or any combination thereof, that may disrupt or impair effective waste management or threaten the public health, human safety or the environment and requires special handling, transportation and disposal procedures. Special waste includes, but is not limited to:

- (1) Ash;
- (2) Industrial and industrial process waste;
- (3) Sludge and dewatered septage;
- (4) Debris from nonhazardous chemical spills and cleanup of those spills;
- (5) Contaminated soils and dredge materials;
- (6) Asbestos and asbestos-containing waste;
- (7) Sand blast grit and non-liquid paint waste;
- (8) High and low pH waste;
- (9) Spent filter media residue; and
- (10) Shredder residue.

Based on Acadia's site inspection, process evaluation and review of records, E. Perry neither receives nor generates any materials that would typically be considered Special Waste.

WASTE FACILITY PERMITTING/LICENSING

As described above, E. Perry receives, sorts, and then packages ferrous and non-ferrous metals for sale to secondary metals markets. E. Perry does not perform any shredding or other processing that changes the chemical or overall physical nature of the metals it

Mr. Alan Lerman
E. Perry Iron & Metals, Inc.
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receives. Based on these operations, MEDEP has not historically required E. Perry to obtain a solid waste facility license.

However, in recent (within the past year) discussions with MEDEP staff, Acadia has learned that the MEDEP is rethinking their policy on scrap metal recycling facilities such that even those facilities that perform only sorting and baling may be required to obtain a license under 06-096 CMR 409, Solid Waste Processors. However, the City's Section 31 Scrap Metal Recycling Facilities Permit Application incorporates and/or references several requirements under 06-096 CMR 402, Transfer Stations and Storage Sites for Solid Waste, so it is not entirely clear which, if any, Chapter of Maine's rules for solid waste facilities applies to E. Perry.

As previously described, E. Perry does not currently nor have they in the recent past generated hazardous waste. They also qualify as a small quantity Universal Waste generator as defined in 06-096 CMR 850, and therefore they are not required to obtain an EPA identification number for hazardous or universal waste generation. They also do not treat, store, or dispose of hazardous waste, and therefore they are not required to obtain a license as a Hazardous Waste Facility under ME DEP Chapter 856.

Spills

Based on site inspection, interviews of facility personnel and review of facility and DEP records, no evidence was found to indicate that E. Perry has had any recent spills of oil, hazardous materials or hazardous wastes. The last known spill was a 10-gallon waste oil spill in 1994 that was reported to MEDEP, who concluded that no further action beyond recovery and disposal of the waste oil was required.

Conclusion

Based on an on-site inspection, review of E. Perry's operations at their Lancaster Street and Somerset St. sites in Portland, interview of key E. Perry Personnel, and discussions with Maine DEP Bureau of Remediation and Waste Management personnel, Acadia finds that E. Perry is in substantial compliance with Maine's rules pertaining to waste management as defined in the Scope of Work described above. However ME DEP Ch. 400 rules are unclear as to whether a solid waste facility license is required for a scrap metal recycling operation such as E. Perry's.

Sincerely,



Mark Arienti, P.E.
Senior Environmental Engineer



Cc: David M. Hirshon, Tompkins, Clough, Hirshon & Langer, P.A.

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SOLD MATERIAL RECORD YEAR TO DATE	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	YEAR TO DATE TOTALS
2007													1,052
A-286	663	-	-	-	-	289	-	-	-	-	-	-	350,030
ALUMINUM, CAST	17,800	20,200	23,120	20,850	61,710	25,460	55,660	29,380	34,030	32,780	29,740	-	10,077
ALUMINUM, E.C. WIRE	2,050	-	-	2,061	-	1,154	4,812	-	-	-	-	-	230,793
ALUMINUM, EXTRUSION	82,661	9,100	28,810	-	12,289	10,300	21,119	21,211	10,992	26,116	8,185	-	181,442
ALUMINUM, 6061 EXTRUSION	21,943	-	-	-	24,811	-	39,493	-	27,001	-	69,394	-	805,750
ALUMINUM, IRONY	-	37,200	-	57,400	86,460	42,930	41,320	35,860	-	16,343	-	-	60,196
ALUMINUM, LITHO	5,540	-	12,920	-	11,904	-	13,489	-	-	15,318	-	-	108,720
ALUMINUM, MLC	19,690	-	18,030	-	16,289	-	39,393	-	-	-	-	-	1,051,149
ALUMINUM, OLD	66,863	75,570	58,680	40,700	117,925	121,900	136,140	75,422	125,418	96,765	94,092	41,474	31,276
ALUMINUM, REMELT	20,076	-	-	4,765	-	-	-	-	6,435	-	-	-	96,097
ALUMINUM, SIDING	13,664	-	11,400	-	11,477	-	-	-	26,773	32,583	-	-	11,667
ALUMINUM, UBC	-	1,817	-	1,580	-	3,980	776	2,414	1,100	-	46,422	-	547,613
ALUMINUM WHEELS	132,009	30,700	39,500	41,302	40,877	30,218	64,927	80,570	41,088	-	-	66,900	813,171
BATTERIES, AUTO	39,900	125,500	-	40,922	126,561	79,492	73,848	58,650	76,485	68,713	36,200	86,900	93,947
BATTERIES, INDUSTRIAL	3,340	-	-	1,728	-	3,817	9,399	12,760	7,273	15,860	2,900	36,940	8,921
BRASS, PIPE	3,610	-	-	-	-	3,234	-	-	-	-	-	-	6,844
BRASS, ROD	59,627	-	36,890	39,395	34,396	-	9,410	49,181	250	45,622	35,730	-	304,481
BRASS, YELLOW	-	-	417	-	-	1,017	-	278	-	1,243	-	-	2,955
CARBIDE	46,065	-	25,360	17,931	-	47,498	3,701	30,206	27,723	7,795	-	-	206,279
COMPOSITION	102,570	42,660	30,161	-	99,441	42,010	40,078	40,329	-	20,882	-	-	358,331
COPPER, #1	110,474	-	29,212	40,342	-	70,075	24,624	26,021	36,344	66,283	-	-	403,376
COPPER, #2	154,206	34,617	8,787	73,825	40,493	38,396	37,454	40,917	-	90,871	40,048	-	659,414
COPPER, BARE BRITE	-	-	-	-	-	2,556	-	-	2,481	8,531	-	-	13,548
COPPER, LEADED LITE	16,459	-	11,700	3,195	-	10,680	-	7,527	1,997	10,339	-	-	61,891
COPPER, LITE	777	360	-	-	-	676	-	-	-	-	-	-	1,813
CU-NI, 70/30	-	-	928	-	-	-	-	1,065	-	-	-	-	1,993
CU-NI, 90/10	50	182	-	-	-	-	1,551	-	715	1,120	-	-	232
HASTEALLOY	430	1,580	-	1,212	-	684	516	-	-	-	-	-	6,608
HEATER CORES	624	664	-	-	-	-	-	-	12,487	9,910	6,290	4,820	2,488
INCONEL	-	10,000	5,140	8,556	7,680	9,200	8,334	-	75,104	780	750	-	82,417
INSULATED WIRE, ACSR	-	3,400	-	-	-	-	-	58,415	8,445	73,750	65,000	33,840	138,449
INSULATED WIRE, #1 COPPER	33,420	36,950	37,870	46,104	102,390	114,846	99,756	5,090	8,445	73,750	65,000	33,840	657,461
INSULATED WIRE, #2 COPPER	14,830	3,900	7,080	13,481	2,795	-	4,708	3,250	10,866	12,415	-	-	79,075
LEAD, REGULAR	2,877	-	-	-	-	-	-	4,470	-	4,276	6,651	3,866	22,440
LEAD, WEIGHTS	1,130	1,106	320	-	-	1,346	-	-	-	-	-	-	3,902
MONEL	1,202	963	-	-	-	1,255	1,034	-	-	-	-	-	4,454
NICKEL	-	-	130	-	-	-	-	-	-	-	33,987	-	130
PEWTER	-	36,350	-	30,235	5,920	-	11,173	-	-	-	-	-	117,665
RADIATORS, ALUMINUM	31,170	40,860	14,872	19,196	-	36,741	29,945	9,568	10,650	39,668	-	-	226,170
RADIATORS, AUTO	-	-	-	800	-	-	-	-	-	-	-	-	800
RADIATORS, AUTO - DIRTY	-	-	-	8,948	17,112	5,060	7,450	4,610	12,567	12,860	6,160	3,900	89,081
RADIATORS, COPPER/ALUMINUM FINS	1,643	8,770	-	5,400	-	-	-	-	7,140	-	-	-	13,966
STAINLESS STEEL, 17-4	-	1,416	-	-	-	-	-	-	-	-	5,570	-	442,943
STAINLESS STEEL, 304	95,430	60,430	51,080	47,500	103,082	50,600	5,666	12,655	4,550	6,980	2,080	-	46,527
STAINLESS STEEL, 316	3,495	-	13,760	5,352	3,885	8,802	3,825	1,783	2,605	-	-	-	22,328
STAINLESS STEEL, P-530	9,452	9,720	-	-	-	-	516	-	-	2,640	-	-	4,211,132
STEEL, #1	308,340	79,740	319,680	227,900	347,740	435,284	516,210	532,250	338,010	384,960	387,598	339,220	-
STEEL/IRON, CAST	-	-	-	-	-	-	-	11,200	57,250	32,950	11,100	-	316,320
STEEL, ELECTRIC MOTORS	3,600	61,440	-	57,390	81,390	256,880	62,400	232,180	236,350	211,360	274,260	169,320	2,322,290
STEEL, LITE	213,780	97,900	123,280	184,970	179,640	115,660	210,060	37,280	41,080	85,390	-	-	87,080
STEEL, P&S	-	51,120	72,940	86,920	39,100	-	-	-	-	-	-	-	1,253
TIN	1,297	-	1,253	-	-	-	-	-	-	-	-	-	1,297
TITANIUM	2,857	2,530	704	-	-	1,804	1,305	-	-	1,200	-	-	10,400
TURNINGS, A-286	8,120	34,600	3,420	40,250	3,982	3,917	25,900	-	29,080	-	8,180	-	149,249
TURNINGS, ALUMINUM	6,202	-	-	9,892	-	-	-	1,550	-	-	-	-	25,824
TURNINGS, BRASS	20,500	-	-	-	-	27,500	-	-	-	-	-	-	48,000
TURNINGS, ROD BRASS	970	-	928	-	-	-	-	9,981	370	-	1,550	-	12,241
TURNINGS, COPPER	1,200	-	-	-	-	1,324	-	-	-	-	-	-	4,074
TURNINGS, CU-NI - 70/30	-	-	-	-	-	-	-	-	-	-	-	-	-
TURNINGS, CU-NI - 90/10	314	182	-	-	-	-	-	-	-	2,965	-	-	3,462
TURNINGS, HASTEALLOY	1,390	3,713	-	-	-	5,187	1,036	-	-	5,560	-	-	16,886
TURNINGS, INCONEL	3,757	5,453	1,800	-	-	833	455	-	-	1,610	-	-	19,909
TURNINGS, MONEL	3,826	824	-	-	-	1,165	4,745	-	-	2,889	-	-	13,149
TURNINGS, NICKEL	1,644	1,240	870	-	-	1,570	1,173	-	-	1,710	-	-	8,007
TURNINGS, NI-TI	-	808	656	-	-	915	760	-	-	2,175	-	-	5,314
TURNINGS, STAINLESS STEEL - 13-8	-	-	-	-	-	-	-	-	-	-	-	-	143,693
TURNINGS, STAINLESS STEEL - 17-4	28,875	15,550	11,980	15,250	16,760	8,220	25,525	14,874	3,100	3,559	-	-	129,002
TURNINGS, STAINLESS STEEL - 304	15,390	7,330	4,860	6,176	-	5,017	40,446	4,043	35,900	2,520	5,520	-	134,332
TURNINGS, STAINLESS STEEL - 316	24,686	5,060	6,860	18,374	3,971	9,406	18,087	16,978	11,910	11,325	-	7,674	151,451
TURNINGS, STAINLESS STEEL - P-530	48,590	6,820	11,610	13,820	11,397	-	32,349	14,385	10,020	-	-	-	295,300
TURNINGS, STEEL	-	-	53,620	48,000	39,840	-	-	109,900	-	-	-	43,940	14,282
TURNINGS, TITANIUM	4,202	1,470	-	-	-	3,668	3,769	493	6,590	-	-	1,620	23,149
ZINC	-	3,024	-	-	2,100	1,315	-	9,600	-	-	-	-	-

METALS RECEIVED AT E. PERRY IRON & METAL, 2007

(quantities in pounds)

ATTACHMENT 2

E. PERRY IRON & METAL CO., INC.
SCRAP METAL ACCEPTANCE POLICY

In order to comply with existing federal, state and local safety and environmental laws and regulations, **PLEASE TAKE NOTICE THAT** the following items ("Prohibited Items") will not be accepted at our facility and **MUST BE REMOVED** from all loads of scrap material **BEFORE DELIVERY TO OUR FACILITY**.

PROHIBITED ITEMS:

- Residential, commercial and industrial scrap with refrigerants, including but not limited to Chlorofluorocarbons (CFC's) and Hydro chlorofluorocarbons (HCFC's).
- Computer monitors and televisions and any other products with Cathode Ray Tubes (CRT's).
- Residential, commercial and industrial scrap or any other products with polychlorinated biphenyls (PCB's).
- Wet or dry capacitors, light ballasts and electrical transformers or transformer components that may contain PCB's.
- Asbestos or asbestos containing materials such as pipe or I-Beam insulation, brake shoes or pads, tiles, packing material and debris.
- Gasoline tanks, oil filters of any kind and engine blocks containing free flowing liquids.
- Tanks, vessels and containers of all sizes unless they are cut in half and are certified to be clean.
- Air bag canisters.
- Water reactive metals (i.e., sodium, potassium and lithium), magnesium metals (capable of independent combustion), and beryllium metals (health hazard).
- Military scrap of any kind unless it is inspected and approved in advance.
- Explosives or explosive materials.
- Tires, wood, yard debris, concrete, asphalt, glass, garbage, loose rubber, dirt, or any other non-metallic materials.
- Any radioactive materials or containers.
- Universal waste lamps including but not limited to: fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- Waste elemental mercury, including mercury switches.
- Compressed gas cylinders, including propane bottles.
- Steel cables and wires greater than 5 feet in length.
- Oils, other petroleum products and petroleum by-products.
- Any other hazardous materials, hazardous wastes, or universal wastes as defined in 38 M.R.S.A. §1362.

IF PROHIBITED ITEMS ARE NOT REMOVED, THEY AND THE MATERIAL THEY CAME WITH MAY BE REJECTED AND THE APPROPRIATE REGULATORY AGENCY WILL BE NOTIFIED, AS NECESSARY. IN LIEU OF REJECTION, WE RESERVE THE RIGHT, AT OUR DISCRETION, TO PROPERLY REMOVE AND DISPOSE OF THE PROHIBITED ITEMS AT SUPPLIER'S EXPENSE.



ATTACHMENT 3

Universal Waste Requirements STORAGE

Generators, owners or operators of any central accumulation or consolidation facility and transporters of universal waste must comply with the requirements for the storage of universal waste in accordance with Chapter 850, Section 3A (13) of the Rules. These provisions are summarized below:

1. Universal waste must be stored in a secured area, which can be **locked** when not in use.
2. Universal waste storage areas must be designated by a clearly marked sign, which states "Universal Hazardous Waste Storage" **or** the type of waste being stored there, i.e. "Waste Cathode Ray Tube Storage", "Waste Lamp Storage", "Waste Mercury Device Storage", "Waste Mercury Thermostat Storage", "Waste Motor Vehicle Switch Storage", "Waste PCB Ballast Storage".
3. Store all universal waste in containers.
 - a. The containers must not show evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
 - b. The containers **must be closed**, structurally sound and compatible with the waste.
4. Each container must be labeled with the date you first put universal waste in it. (This date is called the accumulation start date) **and** the date the container becomes full, if you wish to store universal wastes for more than 365 days. (See #6 below.)
5. Universal waste containers should be marked with the type of waste they contain, i.e. "Waste Cathode Ray Tubes", "Waste Lamps", "Waste Mercury Devices", "Waste Mercury Thermostats", "Waste Motor Vehicle Switches", "Waste PCB Ballasts".
6. A generator **cannot** store universal waste for more than **365** days from the date the waste is **first placed** in the container. However, there is an exception, which allows additional storage time where it is needed to fill a container of waste no larger than the following container sizes and the container is shipped **no more than 90 days** from the date the container is filled*:
 - a. Batteries: A container no larger than 30 gallons.
 - b. Cathode Ray Tubes: One gaylord container, usually 24 CRTs will fit in one gaylord.
 - c. Lamps: A container designed for no more than 190 lamps.
 - d. Mercury Thermostats: A container no larger than 30 gallons.
 - e. Mercury Devices: A container no larger than 55 gallons.
 - f. Motor Vehicle Mercury Switches: A container no larger than 5 gallons.
 - g. PCB Ballasts: A container no larger than 30 gallons.

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- Wet or dry capacitors, light ballasts and electrical transformers or transformer components that may contain PCB's.
- Asbestos or asbestos containing materials such as pipe or I-Beam insulation, brake shoes or pads, tiles, packing material and debris.
- Gasoline tanks, oil filters of any kind and engine blocks containing free flowing liquids.
- Tanks, vessels and containers of all sizes unless they are cut in half and are certified to be clean.
- Air bag canisters.
- Water reactive metals (i.e., sodium, potassium and lithium), magnesium metals (capable of independent combustion), and beryllium metals (health hazard).
- Military scrap of any kind unless it is inspected and approved in advance.
- Explosives or explosive materials.
- Tires, wood, yard debris, concrete, asphalt, glass, garbage, loose rubber, dirt, or any other non-metallic materials.
- Any radioactive materials or containers.
- Universal waste lamps including but not limited to: fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- Waste elemental mercury, including mercury switches.
- Compressed gas cylinders, including propane bottles.
- Steel cables and wires greater than 5 feet in length.
- Oils, other petroleum products and petroleum by-products.
- Any other hazardous materials, hazardous wastes, or universal wastes as defined in 38 M.R.S.A. §1362.

IF PROHIBITED ITEMS ARE NOT REMOVED, THEY AND THE MATERIAL THEY CAME WITH MAY BE REJECTED AND THE APPROPRIATE REGULATORY AGENCY WILL BE NOTIFIED, AS NECESSARY. IN LIEU OF REJECTION, WE RESERVE THE RIGHT, AT OUR DISCRETION, TO PROPERLY REMOVE AND DISPOSE OF THE PROHIBITED ITEMS AT SUPPLIER'S EXPENSE.

ATTACHMENT 3

*Motor vehicle mercury switches must be shipped off at least every three years from when waste is first placed in the container regardless of whether the 5 gallon container is filled.

7. Universal waste must be stored so they **are not exposed** to the weather.
8. Universal waste must be packed in containers with packing materials adequate to prevent breakage during storage, handling and transportation. The use of sectional or egg carton type of packing materials is suggested. The type and amount of packing materials should be adequate to prevent breakage during normal handling and shipping. Certain universal wastes are more fragile than others and will require more care in this regard. Other universal wastes are less fragile such as metal motor vehicle switches and are unlikely to break if placed in a container without packing material. A few motor vehicle switches are made of glass and do need packing material to protect them from breakage.
9. **Full** Universal waste containers must be sealed securely around box openings. **Any** universal waste containers must immediately be **sealed** if incidental breakage occurs. This is an extremely important provision to prevent any broken items from escaping the container, exposing the workers and contaminating the storage area and transportation vehicle. Wide tape with good adhesive properties and that is waterproof is a good choice for boxes. Duct tape often comes loose with time and is not a good choice for most situations.
10. Boxes of universal waste must not be stacked more than 5 feet high. This prevents crushing of items stored in boxes in the lower levels.
11. Universal waste storage areas must be inspected **weekly** and the inspection documented in a **written inspection log** (see Appendix A). The log must include the following items:
 - a. Name of the inspector.
 - b. Date of the inspection.
 - c. Condition of all waste containers.
 - d. Description of any problem noted during the inspection and action taken to fix it.
 - e. Number and type of universal waste on site. (This item may be located somewhere other than the log.)

Small Universal Waste Generators are not required to meet the above weekly inspection requirements except for keeping track of the number and type of universal waste items on site. However, it is recommended that an inspection be conducted whenever waste is added to the universal waste area to reduce the potential for contamination or exposure to universal waste.

ATTACHMENT 3

12. Universal waste containers must be stored to facilitate inspection of the container. The inspector shall be able to determine the accumulation start date, container full date, and the container's condition.

13. All releases of waste and residues resulting from spills or leaks of universal waste must, immediately, be contained and transferred into a container that meets the requirements of the Maine Hazardous Waste Management Rules.

Incidental breakage of ten (10) or fewer lamps or CRTs may still be handled as universal waste. Spills resulting from other than incidental breakage must be handled as hazardous waste in accordance with Chapter 850, Section 3A(13)(e)(viii). The total amount of broken lamps and CRTs in storage may exceed ten (10) items provided no breakage event exceeds the incidental limits. Incidental breakage should however be a rare occasion. If frequent breakage is occurring, the generator, facility and transporter should review their handling procedures and packing materials to ensure that they are adequate for the job. See Appendix B for a suggested spill clean up plan that the Department developed for use by small universal waste generators.

14. Generators that accumulate more than 200 items of universal waste or more than 4,000 motor vehicle mercury switches at any one time or in any given month, must notify the Maine Department of Environmental Protection of the handling of universal waste and must obtain either an EPA Identification Number or a State Identification Number.

ATTACHMENT 3

*Motor vehicle mercury switches must be shipped off at least every three years from when waste is first placed in the container regardless of whether the 5 gallon container is filled.

7. Universal waste must be stored so they **are not exposed** to the weather.
8. Universal waste must be packed in containers with packing materials adequate to prevent breakage during storage, handling and transportation. The use of sectional or egg carton type of packing materials is suggested. The type and amount of packing materials should be adequate to prevent breakage during normal handling and shipping. Certain universal wastes are more fragile than others and will require more care in this regard. Other universal wastes are less fragile such as metal motor vehicle switches and are unlikely to break if placed in a container without packing material. A few motor vehicle switches are made of glass and do need packing material to protect them from breakage.
9. **Full** Universal waste containers must be sealed securely around box openings. **Any** universal waste containers must immediately be **sealed** if incidental breakage occurs. This is an extremely important provision to prevent any broken items from escaping the container, exposing the workers and contaminating the storage area and transportation vehicle. Wide tape with good adhesive properties and that is waterproof is a good choice for boxes. Duct tape often comes loose with time and is not a good choice for most situations.
10. Boxes of universal waste must not be stacked more than 5 feet high. This prevents crushing of items stored in boxes in the lower levels.
11. Universal waste storage areas must be inspected **weekly** and the inspection documented in a **written inspection log** (see Appendix A). The log must include the following items:
 - a. Name of the inspector.
 - b. Date of the inspection.
 - c. Condition of all waste containers.
 - d. Description of any problem noted during the inspection and action taken to fix it.
 - e. Number and type of universal waste on site. (This item may be located somewhere other than the log.)

Small Universal Waste Generators are not required to meet the above weekly inspection requirements except for keeping track of the number and type of universal waste items on site. However, it is recommended that an inspection be conducted whenever waste is added to the universal waste area to reduce the potential for contamination or exposure to universal waste.

Attachment G: Operations Manual

**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

**E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101**

Prepared by:

**Acadia Environmental Technology
48 Free Street
Portland, Maine 04101**



OPERATIONS MANUAL

E. PERRY IRON & METAL Co. Inc. Portland, Maine

Prepared for:

E. Perry Iron & Metal
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101

Revised: April 11, 2008

Mark T. Arienti, PE
Senior Environmental Engineer

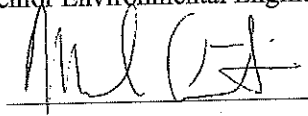




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Attachment 1	Scrap Metal Acceptance Policy
Attachment 2	Special and Hazardous Waste Exclusion Plan
Attachment 3	Reduced Requirements for Small Universal Waste Generators
Attachment 4	List of Equipment
Attachment 5	Training Checklist for New Employees
Attachment 6	Employee Manual

OPERATIONS MANUAL

E. PERRY IRON & METAL Co. Inc.
Portland, Maine

Prepared for:

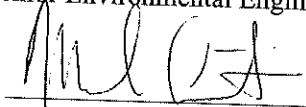
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Mark T. Arienti, PE
Senior Environmental Engineer



**E. Perry Iron & Metals
Operations Manual**

1.0 INTRODUCTION

Purpose and Scope

The purpose of this Operations Manual is to describe E. Perry and Iron & Metal's (E. Perry's) company policies and operational procedures. This Operations Manual has been prepared to address the requirements of applicable Maine Department of Environmental Protection (MEDEP) Solid Waste Regulations.

Company Objective

E. Perry Iron & Metal Co., Inc.'s objective is to purchase ferrous and non-ferrous metals for resale to recyclers. Essential to the company's viability is control of all unnecessary costs of production. Primary among non-production costs are those required to keep people, equipment and facilities functioning. For this reason, company management is committed to managing workplace safety so as to avoid these unnecessary costs. It is expected that all employees will comply with all elements of the company's safe work requirements.

Annual Review

E. Perry will review the Operations Manual annually and update it as necessary to reflect changes in equipment, materials used or received, operating procedures, and/or regulatory requirements.

Facility Organization/Management

The Facility Owner and General Manager is Mr. Alan Lerman. All employees report to Mr. Lerman.

**E. Perry Iron & Metals
Operations Manual**

2.0 SITE DESCRIPTION AND FEATURES

Introduction

E. Perry's Facility includes two sites: one at 9 Somerset Street (Somerset St. Site) and 115 Lancaster Street (Lancaster St. Site) in Portland, Maine. The sites are located in the downtown "Bayside" area of Portland.

The Lancaster Street Site, where the majority of facility operations occur, is approximately one acre in size and occupies one city block. The streets bordering the property are Pearl Street to the northeast, Kennebec Street to the northwest, Chestnut Street to the southwest, and Lancaster Street to the southeast. The property has a building on the eastern corner of the premises, which consists of a small office, entrance gate, and truck scale for the scrap metal yard. The rest of the parcel is open with several sorted piles of various scrap metal. There is a road or path through the parcel that is used by site cranes and trucks delivering materials to the facility.

The Somerset Street Site is less than one acre in size. Bordering this parcel to the northeast is a vacant field, to the northwest are railroad tracks, to the southwest is a scrap metal yard (different ownership), and to the southeast is Somerset Street. The property has a fence on all sides and two locking gates on Somerset Street. There is one small building on the eastern corner of the parcel, which functions as a small office and work shop. The rest of the parcel is open with several parked semi-truck trailers. The property is paved with a loading ramp facing the railroad tracks in the western corner of the parcel.

Physical Setting: Topography at both locations is relatively level, with regional topography sloping toward Portland's Back Cove, which lies approximately 1,300 feet to the northwest. The sites have approximately 3.5 to 11 feet of fill over marine sediments. The sites are approximately 9 feet above mean sea level. The depth to groundwater across the sites averages approximately 6 feet.

Site History and Land Use: The sites were originally an historic reclaimed area (filled wetland/surface water) and have been used as a scrap metal salvage yards since 1896.

Adjacent Property Land Use: The properties adjacent to both parcels consist of industrial and commercial properties.

**E. Perry Iron & Metals
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3.0 FACILITY OPERATIONS

Introduction

E. Perry Iron & Metal Co., Inc. was established in 1896 by Eli Perry and they've been operating at the Lancaster Street location since its inception. They provide scrap metal recycling services to the municipal, commercial, industrial, and private sectors.

The facility hours of operation are Monday-Friday from 7AM to 3PM and Saturday from 7AM through 11AM.

Services at the Lancaster Street location include on-site container services, receiving scrap metals for recycling, and scheduled removal of scrap metals for industrial and commercial customers.

E. Perry buys ferrous and non-ferrous scrap metals including aluminum, brass, bronze, copper, lead, auto batteries, stainless steel, cast iron, steel, insulated copper & aluminum wire, radiators, alloys, nickel, catalytic converters, and zinc.

E. Perry does not accept appliances (refrigerators, dryers, stoves, etc.), motor vehicles, closed tanks, or cylinders. However, they do accept tanks and cylinders that have been cut in half and cleaned. E. Perry also does not accept any liquid, chemical, or hazardous materials of any kind. A detailed list of prohibited items is included as Attachment 1. This list is provided to all customers and is posted at the facility entrance where delivery trucks are weighed in.

E. Perry's Somerset Street site includes a concrete pad from which aluminum turnings are loaded into trailers for off-site shipment. No other scrap metal handling operations occur at this site. A small building is used as an office and workshop for performing minor equipment maintenance and repair. The Somerset St. site is also used as a parking area for E. Perry's truck fleet as well as for storage of empty steel barrels for industrial accounts to collect and ship their turnings and other small metal pieces to E. Perry.

Materials Receiving and Handling

The scrap metals are received or sometimes picked up from industrial, commercial, or residential customers, sorted, baled and/or boxed and shipped off-site for resale to secondary markets. The materials are shipped off as soon as possible so the holding time at the site is minimal.

E. Perry's primary materials receiving area is on Lancaster Street near its intersection with Pearl Street. Vehicles enter at this location, are weighed and then enter the yard to drop off their load. Larger loads may be required to enter through the gates on Kennebec St. (see Site Plan, Figure 1). Signs which list prohibited materials are posted prominently at the main receiving area. In addition, E. Perry posts its Scrap Metal



E. Perry Iron & Metals Operations Manual

Acceptance Policy (see Attachment 1) to all customers. E. Perry also inspects all loads of material for prohibited materials prior to acceptance. If prohibited material is detected, the customer will be notified and the load, or at least a portion of the load, will be rejected.

Upon receipt the material is weighed and then placed in the appropriate area based on type of metal and size. The primary scale is located next to the office at the Lancaster Street receiving entrance; loads of small pieces of non-ferrous metals, generally shipped in steel barrels, are received and weighed inside.

Larger pieces of steel as well as steel turnings are received in the main yard area as indicated in the Site Plan. Some, but not all, aluminum as well as copper wire is received and baled by either the horizontal or vertical balers located under an overhang in the building. Baled wire and aluminum are stacked along the fence line adjacent to Kennebec St. in the northeastern end of the site. Machine shop turnings (steel, bronze, brass, copper, and titanium) are collected in Gaylord boxes or steel barrels, which are then stored in the warehouse or sometimes, when this area is full, in shipping containers just off the southwest end of the building along Lancaster Street.

Lead-acid automobile batteries are received and placed in heavy-duty Gaylord boxes on pallets in a room adjacent to the scale. Once the pallet is full, it is taken out to an enclosed shipping container that is located along the fence line on the Lancaster Street side toward the southwest end of the site. These batteries will only be collected and stored in an inside location and placed over some type of device, either metal, cardboard or plastic, which contains any battery fluid leakage.

The Somerset St. site is used for shipping out loads of aluminum turnings. The aluminum turnings are received on the elevated concrete pad and then loaded into the trailers for shipment off site.

Facility Security

The facility is enclosed by a chain-link fence of at least 8 feet height (and up to 10 feet) with attached screening of varying materials. There are at least two gated entrances at each site. The gates are locked at the end of each work day to prevent site access.

During hours when the facility is open for business facility attendants are stationed at the main entrance and in the yard to oversee site access and use. The facility is only open for business when site access and use is adequately overseen by E. Perry personnel.

Waste Generation, Handling and Disposal

E. Perry is a recycling facility, not a waste disposal nor a waste transfer facility. Waste of any kind generated by E. Perry is minimal and limited to office and packaging rubbish. This waste is placed in one of two 6-yard dumpsters, which are picked up daily by Carey Rubbish Removal.

**E. Perry Iron & Metals
Operations Manual**

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**E. Perry Iron & Metals
Operations Manual**

The generation of waste types other than rubbish at E. Perry is described below.

Hazardous Waste: Based on the type of materials received and the types of operations performed at the facility, E. Perry would not generate hazardous waste (as defined under Maine's *Identification of Hazardous Wastes* rule, 06-096 CMR 850) under normal conditions.

As indicated in Attachment 1, E. Perry does not accept hazardous materials or hazardous wastes. E. Perry communicates this policy to its customers and also inspects every load to confirm that prohibited materials are not accepted. E. Perry also does not provide for disposal of prohibited items that customers inadvertently bring to its facility. However, E. Perry does refer customers that inadvertently bring such prohibited items to a qualified hazardous waste disposal vendor such as Clean Harbors Environmental Services or ENPRO services so that the material can be properly disposed of.

One recyclable item that could result in hazardous waste under unusual conditions is automobile batteries. These batteries contain lead electrodes and utilize sulfuric acid as the electrolyte. Physical damage of the battery casing can result in leakage of the sulfuric acid, which due to very low pH would be considered hazardous waste. E. Perry does not accept damaged lead acid automotive batteries since they may leak hazardous materials, which would be dangerous to employees and require disposal as hazardous waste.

After receipt of lead acid or other batteries containing hazardous electrolyte solutions, E. Perry will place these batteries on pallets and/or in other containers that have the capability to contain any leakage that may occur. These pallets/containers will be stored in a secure indoor location until shipped off-site for recycle.

If an automotive battery becomes damaged after being accepted for recycle, E. Perry will contact a company qualified to handle hazardous materials and wastes to perform any required cleanup and disposal. E. Perry's Special and hazardous Waste Exclusion Plan is included as Attachment 2 to this manual.

Universal Waste: Universal Waste includes batteries (other than automotive batteries), cathode ray tubes (television and computer displays), fluorescent and other mercury-containing lamps, mercury thermostats, other mercury devices, motor vehicle mercury switches, and PCB ballasts.

E. Perry uses fluorescent lamps in its office and warehouse areas. When these lamps reach the end of their useful life, the following actions are taken:

- They are removed and placed in an area with a sign indicating "Universal Waste Storage", which is located in a secure area within the Warehouse building;
- The used lamp is placed in a cardboard container whose size and shape allows for safe lamp storage and is labeled "Universal Waste Lamps",

**E. Perry Iron & Metals
Operations Manual**

- The box is labeled with the date that a Universal Waste item was first placed in the container.
- When a container is full its openings are sealed, and it is labeled with the date that it became full.
- Within 365 days (at the most), the container is shipped to a Universal Waste recycling company. Typically, the materials will be taken to the City of Portland Riverside Recycling Center, which consolidates used lamps in accordance to Maine Hazardous Waste Regulations.
- E. Perry will periodically inspect the Universal Waste Storage area for compliance with DEP requirements and maintain a log of the number and type of Universal Waste items.
- If E. Perry accumulates more than 200 items of universal waste items at any one time or in any given month, they will notify the Maine Department of Environmental Protection of the handling of universal waste and obtain either an EPA Identification Number or a State Identification Number.

The source of the used bulbs at E. Perry is overhead lighting in the office and Warehouse. They don't receive use lamps or any other Universal Waste from customers. E. Perry does not under normal conditions generate other types of Universal Waste, but if other materials (such as computer monitors) are generated they will be handled in a similar manner.

Since the total number of used bulbs accumulated by E. Perry is well below the 200 threshold at any one time, E. Perry qualifies for the Reduced Requirements for Small Universal Waste Generators, which are summarized in Attachment 3.

Oily Waste:

E. Perry generates approximately one to two 55-gallon drums of oily waste annually as a result of performing oil changes on equipment such as the cranes and the baling machines. This oil is collected in an empty barrel, and sent to 3G's Tire and Auto Center on Fox St. in Portland where it is used as fuel to power their *Clean Burn* waste oil furnace. E. Perry will maintain records documenting transfer of waste oil to 3G's Tire and Auto Center and other facilities.

Oil changes will only be performed outside when there is no precipitation occurring. Oil changes will only be performed by persons trained in oil spill response procedures. Oil changes will only be performed when oil-absorbing materials are readily available to soak up any spilled material. Drums or other containers used to collect used oil will be covered when not in use and stored in an indoor location.

Special Waste: City of Portland, Code of Ordinances, Section 31-4 references 06 CMR 405 for the definition of Special Waste, but the actual definition is presented in 06-096 CMR 850 (Maine's *Identification of Hazardous Wastes* rule).

**E. Perry Iron & Metals
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- The used lamp is placed in a cardboard container whose size and shape allows for safe lamp storage and is labeled "Universal Waste Lamps",

**E. Perry Iron & Metals
Operations Manual**

"Special waste," means any solid waste generated by sources other than household and typical commercial establishments that exists in such an unusual quantity or in such a chemical or physical state, or any combination thereof, that may disrupt or impair effective waste management or threaten the public health, human safety or the environment and requires special handling, transportation and disposal procedures. Special waste includes, but is not limited to:

- (1) Ash;*
- (2) Industrial and industrial process waste;*
- (3) Sludge and dewatered septage;*
- (4) Debris from nonhazardous chemical spills and cleanup of those spills;*
- (5) Contaminated soils and dredge materials;*
- (6) Asbestos and asbestos-containing waste;*
- (7) Sand blast grit and non-liquid paint waste;*
- (8) High and low pH waste;*
- (9) Spent filter media residue; and*
- (10) Shredder residue.*

If E. Perry generates any waste fitting this description, it will be segregated and placed in a separate container. A vendor that can provide special waste management services will be contacted to determine how the material will be disposed.

Operational Records

E. Perry maintains records on the type and quantity of materials received, the equipment used and personnel training provided, and any deviations from the approved Operations Manual. These records will be maintained on file at 115 Lancaster Street by the Facility Manager.



**E. Perry Iron & Metals
Operations Manual**

4.0 EQUIPMENT

Introduction

E. Perry utilizes several pieces of equipment in its metal recycling operations including:

- two magnet cranes to pick up and sort through ferrous metals,
- two excavators and two front end loaders to move and load scrap metal,
- five vertical bailing machines and two other bailing machines to package scrap metal,
- three hydraulic sheers to cut metal, and
- several forklifts and skid steers.

A detailed list of equipment is included in Attachment 4. This equipment is regularly inspected, and preventative maintenance is performed to ensure that it functions safely and efficiently. Inspection and maintenance protocol are described below.

Cranes, fork lift trucks, skid steers, and all other trucks or equipment used in material handling shall only be operated by trained and assigned employees.

- Only company authorized operators shall operate cranes.
- Only trained employees shall operate forklift trucks and skid steers.
- Only appropriately licensed and trained employees shall operate dump trucks and other Class 1 or 2 vehicles.

Inspection and Maintenance

OSHA standards at 29 CFR 191 0.180 (d) (2) require "Regular Inspection". E. Perry's preventative maintenance program addresses vehicle and equipment inspection procedures for frequent inspections -those conducted daily to monthly. All vehicle and equipment operators and respective supervisors are required to strictly comply with the following procedures:

1. A clipboard with a supply of checklist forms entitled "Daily Vehicle Operator's List" will be provided for each piece of motorized material handling equipment.
2. Operators will use checklist daily for all listed items and indicate in "Needs Repair" block specific defective item that requires maintenance and/or repairs.
3. Operators will initial block at bottom of each day's form.
4. Management will review reports weekly to determine that all items have been repaired, sign reports and turn reports into the main office to be logged and filed.

Any questions or problems relating to these scheduled inspections shall be referred to Management for resolution.

**E. Perry Iron & Metals
Operations Manual**

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**E. Perry Iron & Metals
Operations Manual**

Training

E. Perry provides training to all new employees to ensure that they can operate the equipment they are assigned to safely and efficiently. A checklist is provided to ensure that all new employees receive this training (Attachment 5).

Follow-up training is performed when new equipment is installed and/or when operating or maintenance procedures are changed.

**E. Perry Iron & Metals
Operations Manual**

5.0 ENVIRONMENTAL MONITORING

E. Perry performs environmental monitoring in accordance with the Scrap Metal Recycling Facility Rules (Rules) promulgated by the City of Portland (City) under Chapter 31, Scrap Metal Recycling Facilities, Revised July 19, 2006, of its Code of Ordinances. This includes annual testing of groundwater as detailed in Rule #8 (a) of the Rules.

**E. Perry Iron & Metals
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**E. Perry Iron & Metals
Operations Manual**

6.0 SAFETY

E. Perry has implemented a comprehensive safety program, which is described in detail in their Employee Manual. The Employee Manual is included as Attachment 6. Basic safety responsibilities are defined below.

Management

Management is responsible for providing a safe working environment for employees. This includes ensuring that process and materials handling equipment necessary to perform their work is available and in safe working order, and that training is provided on potential hazards and how to work in a manner that minimizes exposure to these hazards.

Employees

Employees must maintain a degree of responsibility for their personal behavior to avoid injury to themselves and co-workers. Employees are required to comply with company work standards. Failure to comply with any requirement can threaten employees, equipment or facilities and can result in disciplinary action up to and including discharge.

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ATTACHMENT 1

E. PERRY IRON & METAL CO., INC.

SCRAP METAL ACCEPTANCE POLICY

In order to comply with existing federal, state and local safety and environmental laws and regulations, **PLEASE TAKE NOTICE THAT** the following items ("Prohibited Items") will not be accepted at our facility and **MUST BE REMOVED** from all loads of scrap material **BEFORE DELIVERY TO OUR FACILITY**.

PROHIBITED ITEMS:

- Residential, commercial and industrial scrap with refrigerants, including but not limited to Chlorofluorocarbons (CFC's) and Hydro chlorofluorocarbons (HCFC's).
- Computer monitors and televisions and any other products with Cathode Ray Tubes (CRT's).
- Residential, commercial and industrial scrap or any other products with polychlorinated biphenyls (PCB's).
- Wet or dry capacitors, light ballasts and electrical transformers or transformer components that may contain PCB's.
- Asbestos or asbestos containing materials such as pipe or I-Beam insulation, brake shoes or pads, tiles, packing material and debris.
- Gasoline tanks, oil filters of any kind and engine blocks containing free flowing liquids.
- Tanks, vessels and containers of all sizes unless they are cut in half and are certified to be clean.
- Air bag canisters.
- Water reactive metals (i.e., sodium, potassium and lithium), magnesium metals (capable of independent combustion), and beryllium metals (health hazard).
- Military scrap of any kind unless it is inspected and approved in advance.
- Explosives or explosive materials.
- Tires, wood, yard debris, concrete, asphalt, glass, garbage, loose rubber, dirt, or any other non-metallic materials.
- Any radioactive materials or containers.
- Universal waste lamps including but not limited to: fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- Waste elemental mercury, including mercury switches.
- Compressed gas cylinders, including propane bottles.
- Steel cables and wires greater than 5 feet in length.
- Oils, other petroleum products and petroleum by-products.
- Any other hazardous materials, hazardous wastes, or universal wastes as defined in 38 M.R.S.A. §1362.

IF PROHIBITED ITEMS ARE NOT REMOVED, THEY AND THE MATERIAL THEY CAME WITH MAY BE REJECTED AND THE APPROPRIATE REGULATORY AGENCY WILL BE NOTIFIED, AS NECESSARY. IN LIEU OR REJECTION, WE RESERVE THE RIGHT, AT OUR DISCRETION, TO PROPERLY REMOVE AND DISPOSE OF THE PROHIBITED ITEMS AT SUPPLIER'S EXPENSE.

ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN

1. **Facility Safety Officer.** Justin Lerman shall be designated as the "facility safety officer". Annually, the facility safety officer shall work with the Portland Fire Chief and/or a qualified hazardous materials specialist to provide training to the operator's staff on:
 - A. Detection of hazardous and special waste;
 - B. Appropriate notification procedures; and
 - C. Appropriate handling procedures.
2. **Identification/Notification of Prohibited Wastes.** Prohibited hazardous and special wastes shall not be accepted at E. Perry. To ensure this, the attendant shall check all loads delivered to the facility. The type of container and origin of the material can help identify hazardous wastes and special wastes.

The following list will help with the identification and handling of materials of concern.

PROHIBITED ITEMS:

- Residential, commercial and industrial scrap with refrigerants, including but not limited to Chlorofluorocarbons (CFC's) and Hydro chlorofluorocarbons (HCFC's).
- Computer monitors and televisions and any other products with Cathode Ray Tubes (CRT's).
- Residential, commercial and industrial scrap or any other products with polychlorinated biphenyls (PCB's).
- Wet or dry capacitors, light ballasts and electrical transformers or transformer components that may contain PCB's.
- Asbestos or asbestos containing materials such as pipe or I-Beam insulation, brake shoes or pads, tiles, packing material and debris.
- Gasoline tanks, oil filters of any kind and engine blocks containing free flowing liquids.
- Tanks, vessels and containers of all sizes unless they are cut in half and are certified to be clean.
- Air bag canisters.
- Water reactive metals (i.e., sodium, potassium and lithium), magnesium metals (capable of independent combustion), and beryllium metals (health hazard).
- Military scrap of any kind unless it is inspected and approved in advance.
- Explosives or explosive materials.
- Tires, wood, yard debris, concrete, asphalt, glass, garbage, loose rubber, dirt, or any other non-metallic materials.
- Any radioactive materials or containers.
- Universal waste lamps including but not limited to: fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- Waste elemental mercury, including mercury switches.
- Compressed gas cylinders, including propane bottles.
- Steel cables and wires greater than 5 feet in length.
- Oils, other petroleum products and petroleum by-products.
- Biomedical wastes
- Any kind of liquid materials
- Any other hazardous materials, hazardous wastes, or universal wastes as defined in 38 M.R.S.A. §1362.

ATTACHMENT 1

E. PERRY IRON & METAL CO., INC. ***SCRAP METAL ACCEPTANCE POLICY***

In order to comply with existing federal, state and local safety and environmental laws and regulations, **PLEASE TAKE NOTICE THAT** the following items ("Prohibited Items") will not be accepted at our facility and **MUST BE REMOVED** from all loads of scrap material **BEFORE DELIVERY TO OUR FACILITY**.

PROHIBITED ITEMS:

- Residential, commercial and industrial scrap with refrigerants, including but not limited to Chlorofluorocarbons (CFC's) and Hydro chlorofluorocarbons (HCFC's).
- Computer monitors and televisions and any other products with Cathode Ray Tubes (CRT's).
- Residential, commercial and industrial scrap or any other products with polychlorinated biphenyls (PCB's).
- Wet or dry capacitors, light ballasts and electrical transformers or transformer components that may contain PCB's.
- Asbestos or asbestos containing materials such as pipe or I-Beam insulation, brake shoes or pads, tiles, packing material and debris.
- Gasoline tanks, oil filters of any kind and engine blocks containing free flowing liquids.
- Tanks, vessels and containers of all sizes unless they are cut in half and are certified to be clean.
- Air bag canisters.
- Water reactive metals (i.e., sodium, potassium and lithium), magnesium metals (capable of independent combustion), and beryllium metals (health hazard).
- Military scrap of any kind unless it is inspected and approved in advance.
- Explosives or explosive materials.
- Tires, wood, yard debris, concrete, asphalt, glass, garbage, loose rubber, dirt, or any other non-metallic materials.
- Any radioactive materials or containers.
- Universal waste lamps including but not limited to: fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- Waste elemental mercury, including mercury switches.
- Compressed gas cylinders, including propane bottles.
- Steel cables and wires greater than 5 feet in length.
- Oils, other petroleum products and petroleum by-products.
- Any other hazardous materials, hazardous wastes, or universal wastes as defined in 38 M.R.S.A. §1362.

IF PROHIBITED ITEMS ARE NOT REMOVED, THEY AND THE MATERIAL THEY CAME WITH MAY BE REJECTED AND THE APPROPRIATE REGULATORY AGENCY WILL BE NOTIFIED, AS NECESSARY. IN LIEU OF REJECTION, WE RESERVE THE RIGHT, AT OUR DISCRETION, TO PROPERLY REMOVE AND DISPOSE OF THE PROHIBITED ITEMS AT SUPPLIER'S EXPENSE.

ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN

- 3. Finding and Reacting to an Unknown Waste.** When unknown material is found at the facility, the attendant shall identify the material to determine whether it is licensed solid waste, special waste, or hazardous waste. If hazardous, universal, or biomedical waste, the attendant shall attempt to identify the person who has left, delivered, or attempted to deliver the hazardous waste and notify the DEP.
- A. While keeping a safe distance upwind from the material, the attendant may attempt to determine the following, if safe to do so:
- (1) Look for container or waste labeling;
 - (2) Determine the physical state of the material (solid, liquid, or gas);
 - (3) Estimate container size or amount of waste; and
 - (4) Determine the type and condition of the container or packaging.
- B. If the material is determined to potentially be hazardous, the attendant shall:
- (1) Evacuate and secure the area of the facility site around the material;
 - (2) If safely feasible, determine if there is any release of the material to the soil, water, or air;
 - (3) If safely feasible, determine if any release found has been confined or is ongoing.; and
 - (4) Undertake the appropriate notification procedure below.
- 4. Notification.**
- A. When hazardous waste or suspected hazardous waste is found left at the solid waste facility, the attendant shall:
- (1) Notify the DEP anytime at 1-800-482-0777 or the Maine State Police at 1-800-452-4664,
or
 - (2) If the attendant knows that the local fire department has received training and is qualified to respond to hazardous materials, notify the fire department at (207) 874-8400 or 911 for an emergency.
- B. When prohibited special waste is found left at the facility, the attendant shall notify a solid waste staff person at the DEP regional office between 8 a.m. to 5 p.m., Monday through Friday and the appropriate municipal official to authorized qualified removal.
- C. If the attendant cannot identify the material, notify the Portland Fire Department and DEP at the numbers listed above for assistance in identification. If sampling and further detection of hazardous or special waste is required, a qualified hazardous waste handling firm or solid waste contractor must be used, as appropriate.

ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN

5. Clean-up/decontamination.

- A. Only trained personnel shall handle hazardous wastes. Such training shall follow the guidelines of 29 CFR Part 1910.120. None of E. Perry's employees have received training to handle hazardous materials or wastes.
- B. Prohibited special wastes shall be removed from the area where found by a properly qualified contractor and transported to a special or hazardous waste disposal facility licensed to accept that waste as soon as possible, but not more than 3 days.
- C. A hazardous and special waste holding area will be designated on site. Because hazardous wastes require special training to handle, and to minimize the area of potential contamination, any hazardous waste found at the facility will be removed by qualified personnel from the facility as soon as possible

6. Emergency Information.

- A. The attendant shall have the following telephone numbers available at the solid waste facility to telephone notifications or radio requests for notifications to the dispatchers:
 - (1) DEP, Bureau of Remediation & Waste Management appropriate regional office number during normal business hours and DEP emergency spill number: 1-800-482-0777 for after hours or on weekends.
 - (2) Portland Fire Department: 874-8400 or 911 for emergencies
 - (3) Hazardous Waste Contractor: Clean Harbors (207-799-8111)
 - (4) Cumberland County Sheriff: (800-266-1444)
 - (5) Ambulance: (911)
 - (6) Maine State Police: 1-800-452-4664 for reporting hazardous waste, and
 - (7) Maine Poison Center: 1-800-442-6305
- B. The closest location for emergency medical care is Maine Medical Center. To get there, Head **southwest on Lancaster St** toward **Chestnut St**, Turn **left** at **Chestnut St**, Turn **right** at **Cumberland Ave**, Slight **left** at **Deering Ave/ME-25**, continue to **22 Bramhall St**.

7. Written reports. A written spill report shall be filed with the DEP, Bureau of Remediation & Waste Management within 15 days of any incident involving hazardous waste or material. The report must indicate:

- A. date and time of incident;
- B. location;

ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN

- 3. Finding and Reacting to an Unknown Waste.** When unknown material is found at the facility, the attendant shall identify the material to determine whether it is licensed solid waste, special waste, or hazardous waste. If hazardous, universal, or biomedical waste, the attendant shall attempt to identify the person who has left, delivered, or attempted to deliver the hazardous waste and notify the DEP.
- A. While keeping a safe distance upwind from the material, the attendant may attempt to determine the following, if safe to do so:
- (1) Look for container or waste labeling;
 - (2) Determine the physical state of the material (solid, liquid, or gas);
 - (3) Estimate container size or amount of waste; and
 - (4) Determine the type and condition of the container or packaging.
- B. If the material is determined to potentially be hazardous, the attendant shall:
- (1) Evacuate and secure the area of the facility site around the material;
 - (2) If safely feasible, determine if there is any release of the material to the soil, water, or air;
 - (3) If safely feasible, determine if any release found has been confined or is ongoing.; and
 - (4) Undertake the appropriate notification procedure below.
- 4. Notification.**
- A. When hazardous waste or suspected hazardous waste is found left at the solid waste facility, the attendant shall:
- (1) Notify the DEP anytime at 1-800-482-0777 or the Maine State Police at 1-800-452-4664, or
 - (2) If the attendant knows that the local fire department has received training and is qualified to respond to hazardous materials, notify the fire department at (207) 874-8400 or 911 for an emergency.
- B. When prohibited special waste is found left at the facility, the attendant shall notify a solid waste staff person at the DEP regional office between 8 a.m. to 5 p.m., Monday through Friday and the appropriate municipal official to authorized qualified removal.
- C. If the attendant cannot identify the material, notify the Portland Fire Department and DEP at the numbers listed above for assistance in identification. If sampling and further detection of hazardous or special waste is required, a qualified hazardous waste handling firm or solid waste contractor must be used, as appropriate.

**ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN**

- C. material lost or spilled;
- D. amount lost or spilled;
- E. amount recovered;
- F. cause of the incident;
- G. corrective action taken;
- H. clean-up methods used;
- I. disposition of recovered materials;
- J. list of agencies notified;
- K. time agency responded on site.

ATTACHMENT 3

Universal Waste Requirements STORAGE

Generators, owners or operators of any central accumulation or consolidation facility and transporters of universal waste must comply with the requirements for the storage of universal waste in accordance with Chapter 850, Section 3A (13) of the Rules. These provisions are summarized below:

1. Universal waste must be stored in a secured area, which can be **locked** when not in use.
2. Universal waste storage areas must be designated by a clearly marked sign, which states "Universal Hazardous Waste Storage" **or** the type of waste being stored there, i.e. "Waste Cathode Ray Tube Storage", "Waste Lamp Storage", "Waste Mercury Device Storage", "Waste Mercury Thermostat Storage", "Waste Motor Vehicle Switch Storage", "Waste PCB Ballast Storage".
3. Store all universal waste in containers.
 - a. The containers must not show evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
 - b. The containers **must be closed**, structurally sound and compatible with the waste.
4. Each container must be labeled with the date you first put universal waste in it. (This date is called the accumulation start date) **and** the date the container becomes full, if you wish to store universal wastes for more than 365 days. (See #6 below.)
5. Universal waste containers should be marked with the type of waste they contain, i.e. "Waste Cathode Ray Tubes", "Waste Lamps", "Waste Mercury Devices", "Waste Mercury Thermostats", "Waste Motor Vehicle Switches", "Waste PCB Ballasts".
6. A generator **cannot** store universal waste for more than **365** days from the date the waste is **first placed** in the container. However, there is an exception, which allows additional storage time where it is needed to fill a container of waste no larger than the following container sizes and the container is shipped **no more than 90 days** from the date the container is filled*:
 - a. Batteries: A container no larger than 30 gallons.
 - b. Cathode Ray Tubes: One gaylord container, usually 24 CRTs will fit in one gaylord.
 - c. Lamps: A container designed for no more than 190 lamps.
 - d. Mercury Thermostats: A container no larger than 30 gallons.
 - e. Mercury Devices: A container no larger than 55 gallons.
 - f. Motor Vehicle Mercury Switches: A container no larger than 5 gallons.
 - g. PCB Ballasts: A container no larger than 30 gallons.

ATTACHMENT 2
E. PERRY IRON & METALS
HAZARDOUS & SPECIAL WASTE HANDLING AND EXCLUSION PLAN

- C. material lost or spilled;
- D. amount lost or spilled;
- E. amount recovered;
- F. cause of the incident;
- G. corrective action taken;
- H. clean-up methods used;
- I. disposition of recovered materials;
- J. list of agencies notified;
- K. time agency responded on site.

ATTACHMENT 3

*Motor vehicle mercury switches must be shipped off at least every three years from when waste is first placed in the container regardless of whether the 5 gallon container is filled.

7. Universal waste must be stored so they **are not exposed** to the weather.
8. Universal waste must be packed in containers with packing materials adequate to prevent breakage during storage, handling and transportation. The use of sectional or egg carton type of packing materials is suggested. The type and amount of packing materials should be adequate to prevent breakage during normal handling and shipping. Certain universal wastes are more fragile than others and will require more care in this regard. Other universal wastes are less fragile such as metal motor vehicle switches and are unlikely to break if placed in a container without packing material. A few motor vehicle switches are made of glass and do need packing material to protect them from breakage.
9. **Full** Universal waste containers must be sealed securely around box openings. **Any** universal waste containers must immediately be **sealed** if incidental breakage occurs. This is an extremely important provision to prevent any broken items from escaping the container, exposing the workers and contaminating the storage area and transportation vehicle. Wide tape with good adhesive properties and that is waterproof is a good choice for boxes. Duct tape often comes loose with time and is not a good choice for most situations.
10. Boxes of universal waste must not be stacked more than 5 feet high. This prevents crushing of items stored in boxes in the lower levels.
11. Universal waste storage areas must be inspected **weekly** and the inspection documented in a **written inspection log** (see Appendix A). The log must include the following items:
 - a. Name of the inspector.
 - b. Date of the inspection.
 - c. Condition of all waste containers.
 - d. Description of any problem noted during the inspection and action taken to fix it.
 - e. Number and type of universal waste on site. (This item may be located somewhere other than the log.)

Small Universal Waste Generators are not required to meet the above weekly inspection requirements except for keeping track of the number and type of universal waste items on site. However, it is recommended that an inspection be conducted whenever waste is added to the universal waste area to reduce the potential for contamination or exposure to universal waste.



ATTACHMENT 3

12. Universal waste containers must be stored to facilitate inspection of the container. The inspector shall be able to determine the accumulation start date, container full date, and the container's condition.
13. All releases of waste and residues resulting from spills or leaks of universal waste must, immediately, be contained and transferred into a container that meets the requirements of the Maine Hazardous Waste Management Rules.

Incidental breakage of ten (10) or fewer lamps or CRTs may still be handled as universal waste. Spills resulting from other than incidental breakage must be handled as hazardous waste in accordance with Chapter 850, Section 3A(13)(e)(viii). The total amount of broken lamps and CRTs in storage may exceed ten (10) items provided no breakage event exceeds the incidental limits. Incidental breakage should however be a rare occasion. If frequent breakage is occurring, the generator, facility and transporter should review their handling procedures and packing materials to ensure that they are adequate for the job. See Appendix B for a suggested spill clean up plan that the Department developed for use by small universal waste generators.

14. Generators that accumulate more than 200 items of universal waste or more than 4,000 motor vehicle mercury switches at any one time or in any given month, must notify the Maine Department of Environmental Protection of the handling of universal waste and must obtain either an EPA Identification Number or a State Identification Number.

ATTACHMENT 3

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 - e. Number and type of universal waste on site. (This item may be located somewhere other than the log.)

Small Universal Waste Generators are not required to meet the above weekly inspection requirements except for keeping track of the number and type of universal waste items on site. However, it is recommended that an inspection be conducted whenever waste is added to the universal waste area to reduce the potential for contamination or exposure to universal waste.

ATTACHMENT 4

E. PERRY IRON & METAL CO., INC.

EQUIPMENT SCHEDULE

YEAR	OUR #	DESCRIPTION	SERIAL #	YEAR PURCHASED	PURCHASED NEW/USED
1962	C1	LINK BELT LS98 BOOM CRANE	9LR2269	1970	USED
		CRANE MAGNET			USED
1970	C2	LINK BELT LS98A BOOM CRANE	9LRA3918	1985	USED
		CRANE MAGNET			
1982	C3	LINK BELT LS2800A EXCAVATOR WITH HYDRAULIC GRAPPLE	35H2257A	1997	USED
1999	C4	KOMATSU PC300 LC-6 EXCAVATOR WITH HYDRAULIC GRAPPLE	A83272	2004	USED
1971		ALLIS CHALMERS FRONT END LOADER	?	1982	USED
		TOYOTA 1.5 TON FORKLIFT	?	1982	USED
		PETTI BONE 4WX FRONT END LOADER	?	1982	USED
1984	P2	SELCO VERTICAL BAILING MACHINE VAL 4.5	0584157	1985	NEW
1988	P3	PHILADELPHIA VERTICAL BAILING MACHINE	98T6047	1989	USED
	P4	ECONOMY CHAIN BAILING PRESS	57429	1980	USED
	P5	PIQUA VERTICAL BAILING PRESS	?	1982	USED
2000	P7	ATLAS HORIZONTAL BAILING PRESS	126348	2000	NEW
1990	P8	LORAN VERTICAL BAILING MACHINE	LR-147	2001	USED
1985	P9	ATLAS VERTICAL BAILER	126348	2004	USED
2007	ST2	STRIPTech WIRE STRIPPER - MODEL 5000	3066	2007	NEW
2008		METTLER TOLEDO TRUCK SCALE (PORTLAND)	1155962-1AK (SCALE) 01213206LJ (DISPLAY)	2008	NEW
		TRUCK SCALE (SCARBOROUGH)	?	1982	USED
		HOWE PLATFORM SCALE	?	1993	NEW
		HOWE PLATFORM SCALE	?	1993	NEW
1988	F2	CLARK GP-S30 FORKLIFT	GP138MB-125-6925KOF	1989	NEW
1995	F7	CLARK CGP25 FORKLIFT WITH ROTATING FORKS	P365L-0857-9396	1999	USED
1999	F8	TOYOTA 42-6FGCU15 FORKLIFT WITH ROTATING FORKS	68306	1999	NEW
2003	F10	TOYOTA 7FGU30 FORKLIFT	64204	2003	NEW
2006	F11	TOYOTA 8FGCU25 FORKLIFT	10125	2007	NEW
2006	F12	TOYOTA 8FGCU15 FORKLIFT WITH ROTATING FORKS	10073	2007	NEW
2001	SS4	GEHL SL4635SX SKIDSTEER	301560	2001	NEW
2001	SS5	GEHL SL4635SX SKIDSTEER	28251	2005	USED
2006	SS6	GEHL SL4640E SKIDSTEER	04640P00308721	2007	NEW
1998	SH1	GENSCO 12" 306LS HYDRAULIC SHEAR		1998	NEW
1999	SH2	MCINTYRE MODEL 407 HYDRAULIC SHEAR		1999	NEW
2000	SH3	MCINTYRE MODEL 407 HYDRAULIC SHEAR	607-00	2000	NEW
2007		MACK GRAPPLE (OPSHDCR-100-4)	12671	2007	NEW

ATTACHMENT 5

New Hire Safety Checklist

Employee Name: _____
Hire Date: _____
Dept.: _____
Supervisor: _____
Employee Signature: _____

- Receive and review general job description/requirements (prior to first day of employment)
- Inform employee of appropriate work attire and protective gear (provided if applicable)
- Administer employee handbook
 - o Sign acknowledgement that handbook was received and reviewed
- Review appropriate lifting techniques and materials handling
- Review rules of good housekeeping in work areas
- Comprehension of yard safety; familiarize with facility and surroundings; areas to avoid when work is in progress.
- Overview of equipment and vehicles that will be used.
- Distribution of Forklift operation and safety manual.
- Operator's ability to perform check-sheet inspection for safe operation of truck prior to use.
- Satisfactory completion of forklift driving examination (required to be an authorized forklift operator at E. Perry).
- Knowledge of injury reporting & treatment
 - o If any injury does occur on the job report immediately to supervisor
 - o Treatment by designated physician (Concentra) if necessary

ATTACHMENT 4

E. PERRY IRON & METAL CO., INC.

EQUIPMENT SCHEDULE

YEAR	OUR #	DESCRIPTION	SERIAL #	YEAR PURCHASED	PURCHASED NEW/USED
1962	C1	LINK BELT LS98 BOOM CRANE	9LR2269	1970	USED
		CRANE MAGNET			USED
1970	C2	LINK BELT LS98A BOOM CRANE	9LRA3918	1985	USED
		CRANE MAGNET			USED
1982	C3	LINK BELT LS2800A EXCAVATOR WITH HYDRAULIC GRAPPLE	36H2257A	1997	USED
1999	C4	KOMATSU PC300 LC-6 EXCAVATOR WITH HYDRAULIC GRAPPLE	A83272	2004	USED
1971		ALLIS CHALMERS FRONT END LOADER	?	1982	USED
		TOYOTA 1.5 TON FORKLIFT	?	1982	USED
		PETTI BONE 4WX FRONT END LOADER	?	1982	USED
1984	P2	SELCO VERTICAL BAILING MACHINE VAL 4.5	0584157	1985	NEW
1988	P3	PHILADELPHIA VERTICAL BAILING MACHINE	88T6047	1989	USED
	P4	ECONOMY CHAIN BAILING PRESS	57429	1980	USED
	P5	PIQUA VERTICAL BAILING PRESS	?	1982	USED
2000	P7	ATLAS HORIZONTAL BAILING PRESS	126348	2000	NEW
1990	P8	LORAN VERTICAL BAILING MACHINE	LR-147	2001	USED
1985	P9	ATLAS VERTICAL BAILER	126348	2004	USED
2007	ST2	STRIPTECH WIRE STRIPPER - MODEL 5000	3066	2007	NEW
2008		METTLER TOLEDO TRUCK SCALE (PORTLAND)	1165962-1AK (SCALE)	2008	NEW
		TRUCK SCALE (SCARBOROUGH)	01213206LJ (DISPLAY)		USED
		HOWE PLATFORM SCALE	?	1982	NEW
		HOWE PLATFORM SCALE	?	1993	NEW
1988	F2	CLARK GP-S30 FORKLIFT	GP138MB-125-6925KOF	1989	NEW
1995	F7	CLARK CGP25 FORKLIFT WITH ROTATING FORKS	P365L-0857-9396	1999	USED
1999	F8	TOYOTA 42-6FGCU15 FORKLIFT WITH ROTATING FORKS	68306	1999	NEW
2003	F10	TOYOTA 7FGU30 FORKLIFT	64204	2003	NEW
2006	F11	TOYOTA 8FGCU25 FORKLIFT	10125	2007	NEW
2006	F12	TOYOTA 8FGCU15 FORKLIFT WITH ROTATING FORKS	10073	2007	NEW
2001	SS4	GEHL SL4635SX SKIDSTEER	301560	2001	NEW
2001	SS5	GEHL SL4635SX SKIDSTEER	28251	2005	USED
2006	SS6	GEHL SL4640E SKIDSTEER	04640P00308721	2007	NEW
1998	SH1	GENSCO 12" 306LS HYDRAULIC SHEAR		1998	NEW
1999	SH2	MCINTYRE MODEL 407 HYDRAULIC SHEAR		1999	NEW
2000	SH3	MCINTYRE MODEL 407 HYDRAULIC SHEAR	607-00	2000	NEW
2007		MACK GRAPPLE (OPSIHDCR-100-4)	12671	2007	NEW

**E. PERRY IRON & METAL
CO., INC.**

***EMPLOYEE SAFETY &
WORKPLACE HANDBOOK***

SAFETY IS EVERYBODY'S BUSINESS

This Safety & Workplace handbook is issued to inform you about company safety and workplace policies and requirements, which will enable you to perform your work in a safe manner and avoid personal injury to yourself and your co-workers.

You are expected to read this handbook and take the necessary precautions that apply to your particular job assignment.

If there are any questions regarding any items in this handbook, please discuss them with your immediate supervisor.

**E. PERRY IRON & METAL
CO., INC.**

***EMPLOYEE SAFETY &
WORKPLACE HANDBOOK***

COMPANY OBJECTIVE

E. Perry Iron & Metal Co., Inc.'s objective is to purchase ferrous & non-ferrous metals for resale to recyclers.

Essential to the company's viability is control of all unnecessary costs of production. Primary among non-production costs are those required to keep people, equipment and facilities functioning. For this reason, company management is committed to managing workplace safety so as to avoid these unnecessary costs.

It is expected that all employees will comply with all elements of the company's safe work requirements.

SAFETY POLICY STATEMENT

**THE SAFETY OF ALL EMPLOYEES
IS A CRITICAL FACTOR TO THE
EFFICIENT OPERATION OF THIS COMPANY.**

SAFETY RESPONSIBILITIES

MANAGEMENT:

Management's basic safe work responsibility is to require safe work behaviors. Management will provide and maintain equipment and conditions that will not generate injury.

MANAGEMENT WILL NOT CONDONE, PERMIT, ACCEPT, OR TOLERATE VIOLATIONS OF THE STANDARDS IN THIS HANDBOOK.

EMPLOYEES:

Employees must maintain a degree of responsibility for their personal behavior to avoid injury to themselves and co-workers. Employees are required to comply with company work standards. Failure to comply with any requirement which threaten employees, equipment or facilities can result in disciplinary action up to and including discharge.

SECTION I - GENERAL SAFETY

BASIC STANDARDS

The following standards are general and apply to all employees throughout the company. Violations will be subject to disciplinary action up to and including discharge.

1. Personal protective equipment (specifically: hard hats, safety glasses, steel toe shoes, gloves) and other appropriate safety equipment required for specific operations shall be worn when required. Safety belts and attached lanyard shall be worn whenever working 6' or more above ground level. Other sections in this handbook will address specific equipment. Wearing personal protective equipment when required, as well as appropriate work clothing is continual conditions of employment.
2. Smoking is strictly prohibited when refueling vehicles and when connecting oxygen/acetylene/propane gas cylinders.
3. Employees shall not operate any equipment unless specifically trained and assigned by a supervisor. Only company employees are authorized to operate Company equipment. Under no circumstances are employees to allow any non-employee or untrained/unauthorized employee to operate company equipment.
4. Only authorized personnel are allowed in or to operate the cranes and excavator.

COMPANY OBJECTIVE

E. Perry Iron & Metal Co., Inc.'s objective is to purchase ferrous & non-ferrous metals for resale to recyclers.

Essential to the company's viability is control of all unnecessary costs of production. Primary among non-production costs are those required to keep people, equipment and facilities functioning. For this reason, company management is committed to managing workplace safety so as to avoid these unnecessary costs.

It is expected that all employees will comply with all elements of the company's safe work requirements.

SAFETY POLICY STATEMENT

**THE SAFETY OF ALL EMPLOYEES
IS A CRITICAL FACTOR TO THE
EFFICIENT OPERATION OF THIS COMPANY.**

5. Repairs to equipment shall be performed as directed by a supervisor. The repair person shall be responsible to disconnect and secure all sources of power (tag and lock-out the appropriate switches before beginning work and replace all guards following repairs.)
6. Compressed air and/or oxygen shall not be used to clean clothes or body. Any form of horseplay with compressed air and/or oxygen is prohibited and violators will be subjected to prompt disciplinary action.
7. Horseplay, practical jokes, fighting and hitching rides on equipment is prohibited.
8. Use of alcoholic beverages or illegal drugs, or working under the influence of alcoholic beverages or illegal drugs, is prohibited throughout the company and on any property of E. Perry Iron & Metal Co. and will be grounds for immediate discharge.
9. Defective tools and equipment shall be reported promptly to a supervisor and removed from service (removed from its work area) until repaired.
10. Unsafe and/or hazardous conditions must be promptly reported to a supervisor.
11. Motor vehicles and material handling equipment shall not exceed 5 MPH in and/or around the yard.
12. Finger rings, loose jewelry, loose long hair, and loose clothing shall not be worn while working on machinery.
13. All compressed gas (oxygen, propane, acetylene) cylinders shall be secured with non-combustible material at all times. Cylinder caps shall be in place when transporting cylinders.
14. Only properly grounded electrical tools shall be used. Electrical plugs with broken ground pins shall be reported for repairs.
15. Report fires promptly and proceed to control fire with appropriate fire extinguishers if capable of doing so. Do not use water on any electrical fire. Primary response to a fire is to alert and evacuate.
16. A fire extinguisher shall be readily available and within the area of any hot work. Hot work is defined as any burning, brazing, welding or other spark producing work operation. Access to fire extinguishers shall not be blocked in any way. Production hot work shall not be done inside any building.
17. Employees shall maintain good housekeeping practices at all times. Empty cans, bottles, lunch wrapping and other debris shall be placed in trashcans. Waste oil, old



parts and all waste materials following completion of repair work shall be properly discarded. The job is not completed until the work area has been cleaned.

18. Pile materials, skids, bins, boxes, or other equipment so as not to block aisles, exits, fire-fighting equipment, electrical lighting or power panel, valves, etc. **FIRE DOORS AND AISLES MUST BE KEPT CLEAR.**
19. Employees are not to engage in practices that may be inconsistent with ordinary and reasonable common sense safety rules.

SECTION II - PERSONAL PROTECTIVE EQUIPMENT

The correct personal protective equipment when properly worn can be an effective method of preventing personal injuries to workers exposed to known hazards.

To prevent injuries due to recognized hazards, personal protective equipment is required at E. Perry Iron & Metal Co. as follows:

1. HEAD PROTECTION PROGRAM:

- (a) Hard hats will be provided for all employees and shall be worn in all yard and warehouse areas.
- (b) Hard hats shall be worn with the inner suspension liners. (The winter liner is not a substitute for the suspension liner. The suspension liner shall be worn **over** the winter liner.)
- (c) Holes shall not be drilled into the hard hat to provide extra ventilation. Holes weaken the shell and the hard hat may not withstand the required Federal standard impact requirement.
- (d) Damaged hard hats shall be promptly replaced. Employees will be required to report the cause of the damage or loss to the appropriate supervisor.

2. EYE PROTECTIVE PROGRAM

- (a) Employees performing "eye hazardous operations" such as: drilling, chipping, grinding, handling acids or caustic solutions, burning, welding and other operations as determined by management shall wear appropriate eye protection such as spectacles with side shields, cover-all goggles, face shields, burner and welder's goggles, and rubber formed eye wear, as necessary and with appropriately shaded lenses.

5. Repairs to equipment shall be performed as directed by a supervisor. The repair person shall be responsible to disconnect and secure all sources of power (tag and lock-out the appropriate switches before beginning work and replace all guards following repairs.)
6. Compressed air and/or oxygen shall not be used to clean clothes or body. Any form of horseplay with compressed air and/or oxygen is prohibited and violators will be subjected to prompt disciplinary action.
7. Horseplay, practical jokes, fighting and hitching rides on equipment is prohibited.
8. Use of alcoholic beverages or illegal drugs, or working under the influence of alcoholic beverages or illegal drugs, is prohibited throughout the company and on any property of E. Perry Iron & Metal Co. and will be grounds for immediate discharge.
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17. Employees shall maintain good housekeeping practices at all times. Empty cans, bottles, lunch wrapping and other debris shall be placed in trashcans. Waste oil, old

(b) All eye protection gear will be provided by the company. Damaged eyewear shall be promptly replaced. Employees will be required to report the cause of the damage or loss to the appropriate supervisor.

(c) Contact lenses shall not be worn when performing "hot work".

3. FOOT PROTECTION PROGRAM

(a) Steel Toe (safety) shoes shall be worn at all times in all company work areas. The steel toe safety shoe shall be a thick, slip resistant sole, ankle high work shoe (boot).

(b) Sneakers, sandals, moccasins, thin soled low cut dress shoes, or similar non-work type footwear is strictly forbidden.

(c) After one year of employment, the company will contribute up to \$50.00 per year towards a new pair of safety shoes. A purchase receipt is required for reimbursement.

4. HAND PROTECTION PROGRAM

(a) Leather palmed work gloves shall be worn at all times while handling materials.

(b) Bare hands, glove liners, fingerless gloves, or any other type of gloves not approved by management are strictly forbidden.

(c) The company will supply one pair of work gloves per week per employee.

NOTE: Excessive loss of personal protective equipment beyond reasonable wear and tear could result in disciplinary actions.

SECTION III – SAFE & QUALITY PRODUCTION MEETINGS

Meetings shall be held on company time.

1. PURPOSE:

The purpose of these meetings is to aid management in providing a safe working environment in all areas. By increasing employee safety awareness and developing a safe working attitude, losses resulting in personal injury and/or damage to company property is prevented.

2. FUNCTIONS:

- (a) For employees to identify and to report unsafe conditions or practices in their respective areas.
- (b) For employees to participate in monthly site inspections.
- (c) To review and discuss accident investigation reports and to provide constructive recommendations as necessary to prevent recurrences of similar incidents.
- (d) To promote the company's commitments and assist in developing a positive attitude among co-workers.
- (e) To review items of the monthly inspections and determine appropriate corrective action.
- (f) To review and discuss other pertinent work issues.

SECTION IV - INJURY/ILLNESS REPORTING

Employees shall promptly report any work related injury and/or illness. Failure to promptly report any injury/illness or refusal to accept medical treatment as provided, may jeopardize an employee's compensation benefits or unnecessarily delay adjudication of such claims.

1. EMPLOYEES SHALL FOLLOW THESE PROCEDURES:

- (a) Report to the nearest supervisor, or to the main office for "Authorization for Medical Treatment". (Note: First aid supplies available for minor injuries.)
- (b) Report to our designated medical provider for any treatment. Our medical provider is Concentra Medical Center 1600 Congress Street, Portland, ME 04102. For immediate emergencies, either Maine Medical Center or Mercy Hospital's emergency room will be the designated treatment facility. At no time will an employee transport an injured employee in his/her personal vehicle.
- (c) In all instances, following treatment, report to the main office with any medical status reports. Failure to follow this procedure could jeopardize or delay medical and compensation benefits.
- (d) Every possible effort will be made to provide injured employees with, what is called "limited duty work" (work after injury and during period of recovery directed at return to full status). Such work assignments will be guided by medical evaluations and written descriptions of work capacities. Any vaguely written medical directions not consistent with a common understanding of what an injured person may do will

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- (c) Contact lenses shall not be worn when performing "hot work".

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- (b) Sneakers, sandals, moccasins, thin soled low cut dress shoes, or similar non-work type footwear is strictly forbidden.
- (c) After one year of employment, the company will contribute up to \$50.00 per year towards a new pair of safety shoes. A purchase receipt is required for reimbursement.

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- (c) The company will supply one pair of work gloves per week per employee.

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be returned to the medical provider for clarification so that the company can make assignments in the best interests of the employee, of company needs and of the employees restoration to full capacity as soon as possible. (i.e.: we will provide work opportunities to injured employees but not without explicit direction from the medical provider so that we do not injure the employee further or retard full recovery.)

SECTION V - CRANE INSPECTIONS

Scheduled crane inspections and preventive maintenance are considered effective methods of preventing material handling accidents.

OSHA standards at 29 CFR 1910.180 (d) (2) requires "Regular Inspection".

This program addresses the crane inspection procedures for frequent inspections - those conducted daily to monthly. All crane operators and respective supervisors shall strictly comply with the following procedures:

1. A clipboard with a supply of checklist forms entitled "Daily/Weekly Crane Operator's List" will be provided for each crane.
2. Operators will use checklist daily for all listed items and indicate in "Needs Repair" block specific defective item that requires maintenance and/or repairs.
3. Operators will initial block at bottom of each day's form.
4. Management will review reports weekly to determine that all items have been repaired, sign reports and turn reports into the main office to be logged and filed.

Any questions or problems relating to these scheduled crane inspections shall be referred to Management for resolution.

SECTION VI - VEHICLE / EQUIPMENT INSPECTIONS

Scheduled vehicle and equipment inspections and preventive maintenance are considered effective methods of preventing material handling accidents.

OSHA standards at 29 CFR 1910.180 (d) (2) requires "Regular Inspection".

This program addresses our vehicle and equipment inspection procedures for frequent inspections - those conducted daily to monthly. All vehicle and equipment operators and respective supervisors shall strictly comply with the following procedures:

1. A clipboard with a supply of checklist forms entitled "Daily Vehicle Operator's List" will be provided for each piece of motorized material handling equipment.
2. Operators will use checklist daily for all listed items and indicate in "Needs Repair" block specific defective item that requires maintenance and/or repairs.
3. Operators will initial block at bottom of each day's form.
4. Management will review reports weekly to determine that all items have been repaired, sign reports and turn reports into the main office to be logged and filed.

Any questions or problems relating to these scheduled inspections shall be referred to Management for resolution.

SECTION VII - OPERATING POLICIES

One or more of the following operating policies shall guide all operations of the company. No bypassing or change will be permitted unless top management changes the policy in writing. Following these policies is a condition of employment. Violations may render the violator subject to disciplinary action up to and including discharge.

1. Chemicals and hazardous materials may be found in all areas of the operation. All work with hazardous materials shall be done with due respect to the nature of the hazard. Appropriate procedures and personal protective equipment will be used (to include eye and face protection, skin protection, exposure control to vapors and fumes) when handling hazardous materials. No one will handle hazardous materials unless specifically trained and properly equipped to handle them. All stored hazardous materials will be stored in areas with appropriate signage. All containers not in batch areas shall be labeled as to what they contain. Material Safety Data Sheets (MSDS) for all materials used by employees or to which employees could be exposed in the course of their employment at E. Perry Iron & Metal Co., Inc. are maintained on file in the company office. Access to any and all sheets is a right of all employees. If any employee desires to review such material, the employee should request the MSDS from the Office Manager, during normal business hours, and it will be provided within a reasonable time frame. If an employee requests that a copy be made for an individual material, the Office Manager will provide such a copy at no cost to the employee, again within a reasonable time frame. "Reasonable" can be understood as "within the shift during which it was requested". Requests made within one hour of the end of the shift or workday may be delayed until the next shift if required by business circumstances.
2. When repair or maintenance work on powered equipment places the employee within an operating hazard, the equipment will be de-energized and locked out at the power

be returned to the medical provider for clarification so that the company can make assignments in the best interests of the employee, of company needs and of the employees restoration to full capacity as soon as possible. (i.e.: we will provide work opportunities to injured employees but not without explicit direction from the medical provider so that we do not injure the employee further or retard full recovery.)

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This program addresses the crane inspection procedures for frequent inspections - those conducted daily to monthly. All crane operators and respective supervisors shall strictly comply with the following procedures:

1. A clipboard with a supply of checklist forms entitled "Daily/Weekly Crane Operator's List" will be provided for each crane.
2. Operators will use checklist daily for all listed items and indicate in "Needs Repair" block specific defective item that requires maintenance and/or repairs.
3. Operators will initial block at bottom of each day's form.
4. Management will review reports weekly to determine that all items have been repaired, sign reports and turn reports into the main office to be logged and filed.

Any questions or problems relating to these scheduled crane inspections shall be referred to Management for resolution.

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OSHA standards at 29 CFR 1910.180 (d) (2) requires "Regular Inspection".

This program addresses our vehicle and equipment inspection procedures for frequent inspections - those conducted daily to monthly. All vehicle and equipment operators and respective supervisors shall strictly comply with the following procedures:

source. **NO EXCEPTIONS, for any person or for any job or piece of equipment. Everyone working on the equipment must apply his or her individual lock.** No one may remove a lock applied by another, except the President of the company, and only after a full investigation that removal will not create a problem.

3. When anyone is doing hot work (e.g.: flame cutting, welding), a full and functioning extinguisher shall be immediately available in the immediate vicinity of the work.
4. Motorized material handling equipment (fork lifts, skid steers, cranes) shall never be operated by anyone unless the operator has been specifically trained and authorized. Lifting equipment shall be inspected, and the inspection documented, at the beginning of each shift.
5. All unprotected contact with the blood and/or bodily fluids of another person is strictly prohibited.
6. In the case of fire, employees are expected to raise alarm, evacuate the premises and gather on the corner in front of the company office.
7. Based upon an analysis of work area hazards, the following items of Personal Protective Equipment will always be used at work: hard hat, eye protection, steel-toed shoes, long pants with no cuffs, long sleeves when doing hot work with the sleeves rolled down, and gloves. Other items of Personal Protective Equipment such as face shields and goggles will be worn when the nature of the work requires it.

SECTION VIII - MATERIAL HANDLING EQUIPMENT

Cranes, fork lift trucks, skid steers, and all other trucks or equipment used in material handling shall only be operated by trained and assigned employees.

- a. Only company authorized operators shall operate cranes.
- b. Only trained employees shall operate forklift trucks and skid steers.
- c. Only appropriately licensed and trained employees shall operate dump trucks and other Class 1 or 2 vehicles.

SECTION IX - SUMMARY

By enforcing these work standards with the potential for disciplinary action(s) is an effective management tool for insuring that all employees follow company standards.

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SECTION IX - SUMMARY

By enforcing these work standards with the potential for disciplinary action(s) is an effective management tool for insuring that all employees follow company standards.

Some offenses related to safety and health may call for immediate discharge. In other cases, an initial offense may call for discipline, with a subsequent offense(s) resulting in progressively greater discipline, up to and including discharge. Oral reprimands, written warnings, suspension and discharge may be used as management deems necessary.

SECTION X – DRIVING POLICY FOR OPERATORS OF COMPANY COMMERCIAL ON-ROAD VEHICLES

PURPOSE

To ensure that the best interests of the company and the public are preserved by operators of on-road, company owned or leased vehicles. (“Owned” and “Leased” are equal in terms of this policy.)

ELEMENTS

1. Prior to being authorized to drive any company on-road vehicle on public roads, the potential driver must supply the company with a copy of a valid driver’s license, valid for the type of vehicle to be operated.
2. Prior to being authorized to drive, the company shall conduct a D.M.V. license and driving record check of the potential driver’s driving history with the Maine Department of Transportation. Any serious license charges or pattern of charges would disqualify someone from being authorized to drive a company vehicle, at the sole discretion of the company owner.
3. When the authorization to drive a vehicle is for a leased commercial vehicle, and the leasing company has a “driver authorization” process, the potential driver must also pass the leasing company’s process.
4. Any driver authorized with a C.D.L. must participate in the company’s random drug testing program.
5. Should any authorized driver have:
 - A traffic violation or accident with a company vehicle, the company owner must be notified within the work shift of the occurrence.

- A traffic violation on non-company time in or with a non-company vehicle on non-work time, the company owner must be notified by the end of the next scheduled workday.

Depending on the nature of the incident, the company owner shall make a determination on the authorization to continue driving. (i.e. a DWI or OUI will be treated more seriously than a parking ticket or a speeding ticket for 10 miles over the limit.)

Failure to make either notification shall automatically remove authorization to drive any company vehicle and may result in disciplinary actions including dismissal, at the sole discretion of the company owner.

6. It is expected (mandated) that an authorized driver will adhere to all State and Federal laws and regulations applicable to the vehicle being operated. The following are examples of laws and regulations which are mandatory: use of seat belts for driver and passenger, driving according to speed limits, not driving while under the influence of alcohol or any legal or illegal substance which can disorient a driver, following driving time restrictions, following load weight restrictions, following load positioning requirements, etc.
7. It is expected that an authorized driver will report ANY defect in the vehicle as soon as it is observed to management, no later than the end of the work shift when it is observed. Any obvious defect that is not observed and not reported and results in the vehicle being cited for the defect, the driver shall bear the cost of any such citations.
8. Any citations issued for conditions and driving behaviors within the control of the driver will be paid for by the driver. The company shall be responsible for citations which:
 - Are for vehicle conditions, which have been reported to the company and not addressed by the company.
 - Are for vehicle conditions which one would not expect the driver to be aware of such as tire tread depth just below acceptable limits, lapse of insurance coverage. In summary, any company administrative lapses or violations.
9. The company owner may withdraw authorization to drive for any reason that is deemed necessary to protect the company, company assets, and the on-road public at large, at the sole discretion of the owner.
10. It is the responsibility of the authorized driver to ensure that the company has on file an up-to-date copy of newly issued licenses or license renewals.

11. Drivers will be issued one (1) set of insurance reports for any vehicle damage or vehicle incident. A second set of insurance reports will be transmitted to an authorized driver only after due deliberation by the company owner and a formal conference with the driver, with due notification in the driver's company personnel file.
12. Drivers will be issued commercial vehicle inspection forms. It is expected that the commercial vehicle will be inspected daily and recorded on the form. The form will be turned into the office on a daily basis where a decision will be made as to the continued operability of the commercial vehicle or scheduling for immediate maintenance. Consistent failure to complete the daily commercial vehicle inspection report will result in disciplinary actions including but not limited to withdrawal of authorization to driver, reprimand, or dismissal.
13. An authorized driver may refuse to drive a vehicle, which in his sole judgment is not safe to operate or is in violation of any state or federal laws or regulations. Such justified refusal will have no bearing on the driver's continued authorization to drive or on the driver's employment.
14. All drivers of company vehicles, which are of a size requiring a Commercial Driver's license, will be enrolled in the Occupational Health & Rehabilitation's substance testing service. The purpose of this service is to place our drivers in a pool of other small company CDL drivers for purposes of random substance abuse testing. If an E. Perry Iron & Metal Co., Inc. employee is called upon as a result of such random "drawing", the employee will be required to submit to the required testing. If the employee refuses or fails to submit as required, the employee will be immediately relieved of company driving privileges and, at the sole discretion of the company President be immediately terminated or re-assigned to some other company position at a pay rate commensurate with the new position. No re-assignment will be made to a position involving or requiring equipment operation. Rationale: similar to the rationale for refusal to take a police-requested Breathalyzer test - refusal is considered as presumed "guilty as charged".

SECTION XI - WHAT YOU SHOULD KNOW

PROBATIONARY PERIOD

You will be considered on a temporary trial basis for a period of 90 days from the date of employment, and may be discharged, laid off or have your services terminated for any cause whatsoever before the expiration of that period. The benefit program applies only after your probationary period has been completed.

- A traffic violation on non-company time in or with a non-company vehicle on non-work time, the company owner must be notified by the end of the next scheduled workday.

Depending on the nature of the incident, the company owner shall make a determination on the authorization to continue driving. (i.e. a DWI or OUI will be treated more seriously than a parking ticket or a speeding ticket for 10 miles over the limit.)

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7. It is expected that an authorized driver will report ANY defect in the vehicle as soon as it is observed to management, no later than the end of the work shift when it is observed. Any obvious defect that is not observed and not reported and results in the vehicle being cited for the defect, the driver shall bear the cost of any such citations.
8. Any citations issued for conditions and driving behaviors within the control of the driver will be paid for by the driver. The company shall be responsible for citations which:
 - Are for vehicle conditions, which have been reported to the company and not addressed by the company.
 - Are for vehicle conditions which one would not expect the driver to be aware of such as tire tread depth just below acceptable limits, lapse of insurance coverage. In summary, any company administrative lapses or violations.
9. The company owner may withdraw authorization to drive for any reason that is deemed necessary to protect the company, company assets, and the on-road public at large, at the sole discretion of the owner.
10. It is the responsibility of the authorized driver to ensure that the company has on file an up-to-date copy of newly issued licenses or license renewals.

CONFIDENTIALITY

All information obtained by virtue of employment in our company must be held in strictest confidence. No information should ever be revealed to unauthorized persons.

FULL TIME EMPLOYEE

Full time employees are any employees who are working 40 hours or more on a regularly scheduled weekly basis.

E. Perry Iron & Metal's employees normally work a minimum 40 to 50 hours per week including Saturday mornings.

No benefits apply to anyone other than employees designated as full time who have completed their probationary period.

WORK HOURS, BREAKS AND OVERTIME

E. Perry Iron & Metal Co., Inc.'s operating hours are from 7:00 A.M. to 3:30 P.M. at both our locations at 115 Lancaster St., Portland and Rigby Rd. in Scarborough and from 7:00 A.M. to 11:30 A.M. on Saturday at the Portland location only.

Lunch is to be taken from 12:00 P.M. to 12:30 P.M.

Coffee break is 15 minutes long in the morning only.

Time and a half is paid for time in excess of 40 hours a week.

PAY PERIOD

The pay period runs from Friday to Thursday. The paychecks are distributed on the Friday for the week just ended on Thursday. Payroll is processed through a payroll company and direct deposit is available to all employees at no charge.

NON-SOLICITATION

It should be remembered that working time and work areas are for work. Non-work activity (including solicitation, distribution of written materials, asking for money, collections, and selling tickets, etc.) is not to be conducted during working hours or in work areas.

MATERNITY LEAVE

Women requesting maternity leave must do so in writing to your supervisor 2 weeks prior to departure. A woman has up to 8 weeks from her departure to return to work without loss of benefits and/or position. All maternity leave time will be without pay (vacation time may be used).

MILITARY LEAVE

Military leave will be granted for a period not to exceed 17 days, without pay. A written request to your supervisor plus a copy of your military orders is required. Extending your leave beyond 17 days without written permission could result in loss of job and/or benefits.

BEREAVEMENT LEAVE

One day paid leave will be authorized for deaths of immediate family (mother, father, brother, sister, grandparent, or siblings). A copy of an obituary or related material must be provided to management.

PERSONAL/SICK DAYS

In the case of sickness, the company will pay up to a maximum of two (2) days each year after one year of full time employment (including probationary period). Personal/sick days are accumulated at a rate of one per every six months of employment (including the probationary period) starting with the effective date of this handbook. These days are available to the employee for use as needed for sickness or other personal matters. These days do not carry over from year to year. You start to accumulate these days from the beginning of each calendar year.

If sick and unable to come to work, the employee is required to notify his employer in advance of the start time of their shift. Failure to do so may result in loss of the compensation. Personal days may be taken with at least one weeks notice to your immediate supervisor (subject to approval).

JURY DUTY

If you are called for jury duty service and have completed your probationary period, the company will pay you for one day out for the time served for jury duty. Any additional time past one day will be considered an unpaid leave of absence. You must present your notification to your supervisor at least four (4) weeks in advance of your absence.

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Coffee break is 15 minutes long in the morning only.

Time and a half is paid for time in excess of 40 hours a week.

PAY PERIOD

The pay period runs from Friday to Thursday. The paychecks are distributed on the Friday for the week just ended on Thursday. Payroll is processed through a payroll company and direct deposit is available to all employees at no charge.

NON-SOLICITATION

It should be remembered that working time and work areas are for work. Non-work activity (including solicitation, distribution of written materials, asking for money, collections, and selling tickets, etc.) is not to be conducted during working hours or in work areas.

WARNINGS, REPRIMANDS AND TERMINATIONS

The company has developed a progressive disciplinary policy/procedure. When an employee violates a company procedure or works in such a way as not to be in the best interests of the company, the company President shall proceed as follows:

1. The company President shall meet with the employee in a confidential setting and verbally outline the violation or the employee's work behavior that is not in the best interests of the company. Included in the discussion will be specific behavioral changes that are required and any other stipulations appropriate at the time. (Example: "You are taking more time than is allowed for coffee breaks. The time allowed is 15 minutes and that is all. Please change your behavior." Or: "You are swearing at customers or calling them names. This will stop immediately.") The President may make a written notice for himself of the date of the discussion and the content of the discussion.
2. Should a second infraction of the same incident be observed again, the President, in a confidential setting will discuss the matter with the employee; review the infraction and the behavior change required. The President will document the discussions on the company "Reprimand Form." This form is to be signed by the employee and will be kept in the employee's permanent personnel file.
3. Any third infraction will result in immediate termination.

Combinations of any two written reprimands within one year (12 months) may result in a one-day suspension without pay.

Combinations of any three written reprimands within one year (12 months) may result in immediate dismissal.

DRESS CODE

E. Perry Iron & Metal Co.'s dress code is casual uniformed attire. Casual attire for yard and/or warehouse employees is to be construed as long work pants (Dickies or Jeans) and long sleeve work shirts. Shirts must be worn at all times. Under no circumstances will short pants be allowed to be worn by employees.

The company will pay for the cost of uniforms after one year of service. Employees are encouraged to wear the company provided uniforms. If you choose not to wear the company uniforms then you are required to wear clothing as outlined above.

TELEPHONE

Due to the number of business calls daily, we must restrict the phone to company business only. Personal calls may be made from the office only during break or lunch time. Incoming personal phone calls will be relayed to you by message (except in case of emergency).

PERSONAL LOANS

The company will not make personal loans to employees. Advances against future wages are made only with the approval of the owner. Advances must be paid back in the next pay period.

SECTION XII - WORKING TOGETHER

RULES OF CONDUCT

The following list of actions are considered to be against the best interest of the majority and will be subject to corrective actions including reprimand, warning, suspension or dismissal:

1. Employees must be at their appointed work places, ready to work, at the appointed starting time for their position and shall remain at such work places and at work until regular quitting time or until relieved. Work starts on the ¼ hour and employees shall be prepared to start work.
2. Stealing.
3. Willful damage to, or destruction or theft of property belonging to fellow employees or to the company.
4. Fighting, horseplay, disorderly or immoral conduct.
5. Falsifying any time record.
6. Refusing or failing to carry out any instructions of a supervisor.
7. Leaving your work station (except for reasonable personal needs) without permission from your supervisor.
8. Inattention to duties, visiting or loafing during working hours.
9. Numerous garnishment or assignment of wages.

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The company will pay for the cost of uniforms after one year of service. Employees are encouraged to wear the company provided uniforms. If you choose not to wear the company uniforms then you are required to wear clothing as outlined above.

10. Coming to work under the influence of alcohol or any illegal drugs, or bringing alcoholic beverages or illegal drugs onto company property.
11. Intentionally giving any false or misleading information to obtain employment or leave of absence.
12. Smoking contrary to established practice or violating any other fire protection regulation or smoking in non-smoking areas.
13. Willful or habitual violation of safety or health regulations.
14. Frequent tardiness or unexcused absences from work.
15. Carelessness or neglect resulting in abuse to equipment and/or tools.
16. Possession of firearms, or weapons of any kind on company property.
17. Use of threatening or abusive language toward a fellow employee, customer or supervisor.
18. Unauthorized distribution of literature, or written or printed matter of any description on company premises.
19. Failure to wear clothing conforming to the standards established by the management.
20. Employees shall not enter or remain on the premises unless they are on duty, scheduled to work, or are otherwise authorized by the management.
21. Unauthorized use of company equipment.

YOUR BENEFITS

GROUP MEDICAL CARE INSURANCE

All full time employees, after completing their probationary period, are eligible for participation in the company's group health insurance program (after 90 day probationary period). The company will pay for $\frac{3}{4}$ of the cost of single employee coverage. The remaining $\frac{1}{4}$ of the cost will be deducted from your paycheck weekly. If you desire coverage for your spouse and family, the additional premiums will be your responsibility and will be deducted from your paycheck. If you do not desire to participate, you must sign a waiver form upon completion of your probationary period. Refer to the insurance handbook for further details.

Continuation of insurance ceases when the first of the following occurs:

1. You become eligible for other group insurance.
2. Termination of the group policy.
3. Eligibility for Medicare.

GROUP LIFE & ACCIDENTAL DEATH INSURANCE

All full time employees, after completing their 90-day probationary period, are eligible for participation in the company's life and accidental death insurance program. The company will pay for 100% of the premiums for this coverage. Coverage is for \$20,000. If you do not desire to participate, you must sign a waiver form upon completion of your probationary period.

If you leave for any reason, your life insurance coverage will cease unless you elect to transfer the policy to private ownership. You will be responsible for any additional premium payments from that time forward.

VACATION POLICY

After 12 months of continuous employment (including the probationary period), you earn one week paid vacation. Two weeks paid vacation is provided to employees who have completed three full years of employment. Vacations are assigned by seniority and company needs. There is no accumulation of vacation days from one year to the next. Regular scheduled holidays falling during your designated vacation period are not considered as vacation days taken. Vacation time requests must be submitted 30 days prior to start of vacation.

PAID HOLIDAYS

You will receive your regular pay for the following holidays provided you work immediately the day before and after the holiday (except under the vacation situation noted above). Should any of the holidays noted fall on your normal day off from work, arrangements for a substitute day can be made with your supervisor.

Employees who are required to work any of the noted holidays will be paid at a time and a half rate, plus specified holiday pay.

10. Coming to work under the influence of alcohol or any illegal drugs, or bringing alcoholic beverages or illegal drugs onto company property.
11. Intentionally giving any false or misleading information to obtain employment or leave of absence.
12. Smoking contrary to established practice or violating any other fire protection regulation or smoking in non-smoking areas.
13. Willful or habitual violation of safety or health regulations.
14. Frequent tardiness or unexcused absences from work.
15. Carelessness or neglect resulting in abuse to equipment and/or tools.
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Paid holidays are as follows:

1. New Year's Day
2. President's Day (Monday only)
3. Memorial Day (Saturday holiday also)
4. Fourth of July (Saturday holiday also when applicable)
5. Labor Day (Saturday holiday also)
6. Thanksgiving Day
7. Day after Thanksgiving (Saturday holiday also)
8. Christmas Day (Saturday holiday also when applicable)

EQUAL EMPLOYMENT OPPORTUNITY

E. Perry Iron & Metal Co., Inc. is an Equal Opportunity Employer and follows a practice of affirmative action in promoting equal employment opportunity. The Company does not discriminate on the basis of a person's race, religion, color, age, sex, sexual orientation, national origin, handicap, or disabled or Vietnam era veteran status, regarding considerations such as recruiting, hiring, training, and/or on-the-job treatment and promotion.

NOT A CONTRACT

This booklet is not now or ever intended to be a contract, binding or non-binding. The material supplied is for informational purposes only. The policies and procedures expressed are subject to change with or without notice. The Company reserves the right to terminate any employee for any reason whatsoever, at any time it so desires.

REV. 11/2003

Attachment H: Annual Report

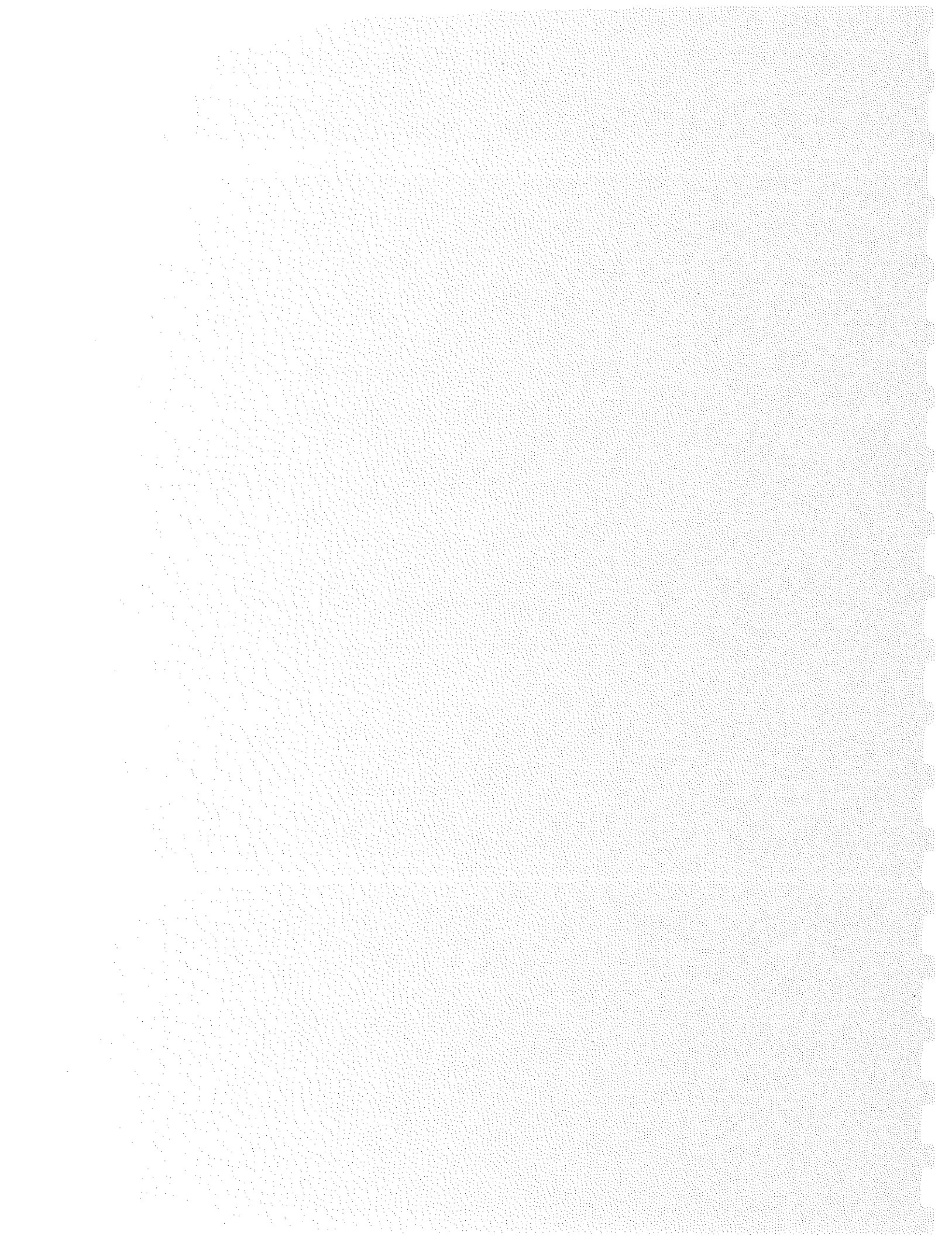
**Scrap Metal Recycling Facilities Permit Application
Chapter 31, Portland City Code §31-1 et. Seq.
E. Perry Iron & Metal Co.
Portland, Maine**

Prepared for:

E. Perry Iron & Metal Co.
115 Lancaster Street
Portland, Maine 04101

Prepared by:

Acadia Environmental Technology
48 Free Street
Portland, Maine 04101



**Annual Report Form
for PROCESSING FACILITIES, and
TRANSFER STATIONS and/or STORAGE SITES**

LICENSEE: E. Perry Iron and Metal and Co., Inc

CONTACT PERSON: Alan Lerman PHONE NO: 775-3181

DEP LICENSE NUMBER: _____

1. Summary of activity during past year (including factors which affected the operation, design, or environmental monitoring program).

A summary of scrap metal handled at E. Perry in 2007 is attached with this form. No activities occurred that measurably affected operation, design, or environmental monitoring in 2007.

2. Operations

A. Submit copies of reports prepared in accordance with the transfer station or storage facility's Hazardous and Special Waste Handling and Exclusion Plan.

B. Report on deviations from approved operations manual and proposed changes in operations and/or operations manual.

Past Year Deviations

No deviations _____

Proposed Changes

No proposed changes _____

3. Summary of staff training provided on operation or maintenance of the transfer station.

A copy of the New Hire Safety Checklist is attached. All new employees are required to meet the checklist standards prior to working independently. Topics include knowledge of general job requirements, proper lifting techniques, yard safety, overview of equipment, fork lift safety and injury reporting and treatment procedures.

4. Summary of all spills, fires and/or accidents on-site.

A. Spills

No spills occurred on-site in 2007.

B. Fires

No fires occurred in 2007.

C. Accidents

No significant accidents occurred in 2007.

5. Provide verification of 2 feet till soil between waste, and seasonal high water and bedrock if one or more base pads for storage of non-containerized waste is used. (Required for transfer station or storage facility only.)

Groundwater level testing performed in June 2005 (typically at or near seasonal high water level) show that groundwater at the 9 Somerset Street property is shallowest at the western corner of the property in MW-A at a depth of 4.0 feet below ground surface. Groundwater in the other 4 wells on the property is between 7.5 and 8 feet below ground surface. At the 155 Somerset Street property, the shallowest groundwater was observed at 3.5 feet below ground surface in northwestern portion of the site (MW-3 and MW-5). Groundwater in the other wells on the property ranged from 4.0 to 7.5 feet below ground surface. A table of the groundwater depth information and figures showing the locations of the wells is attached.

6. Design

If any aspect of design was changed, please submit as-built plans and a narrative on these changes (proposed design changes for current year may be described).

No significant design changes occurred in 2007 or are planned for 2008.

7. Monitoring (if facility has a monitoring plan).

Evaluation of past year's monitoring results, monitoring program and equipment; recommended changes may be submitted. Attach additional sheets or provide a separate attachment if additional space is needed.

A. Monitoring Results

No groundwater monitoring was conducted in 2007.

B. Monitoring Program

E. Perry will perform environmental monitoring in 2008 in accordance with the Scrap Metal Recycling Facility Rules (Rules) promulgated by the City of Portland (City) under Chapter 31, Scrap Metal Recycling Facilities, Revised July 19, 2006, of its Code of Ordinances.

This monitoring will consist of collecting groundwater from 3 monitoring wells on each of the properties (MW-3, MW-5 and MW-6 at the Lancaster Street property and MW-A, MW-B AND MW-C at the Somerset Street Property). Groundwater samples will be submitted to a laboratory certified for the analysis of VOCs (EPA Method 8260B), SVOCs (EPA Method 8270), PCBs (EPA Method 8082), metals (EPA method 6010 or 7000 series: arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, nickel, zinc, copper and antimony), DRO (Maine Health and Environmental Testing Laboratory, HETL, Method 4.1.25) and

Annual Report Form for PROCESSING FACILITIES, and TRANSFER STATIONS and/or STORAGE SITES

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- B. Report on deviations from approved operations manual and proposed changes in operations and/or operations manual.

Past Year Deviations

No deviations

Proposed Changes

No proposed changes

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A copy of the New Hire Safety Checklist is attached. All new employees are required to meet the checklist standards prior to working independently. Topics include knowledge of general job requirements, proper lifting techniques, yard safety, overview of equipment, fork lift safety and injury reporting and treatment procedures.

4. Summary of all spills, fires and/or accidents on-site.

A. Spills

No spills occurred on-site in 2007.

B. Fires

No fires occurred in 2007.

GRO (Maine HETL Method 4.2.17). The wells will be sampled once a year and a report will be submitted to the City.

C. Equipment

A list of currently active equipment is attached.

D. Recommended Changes

E. Perry will begin implementing a groundwater monitoring program.

8. Provide a summary of universal waste handling activities at the transfer station.

E. Perry does not receive universal waste from its customers. E. Perry uses fluorescent bulbs to light their warehouse and office areas. Bulbs which have burned out are placed in a cardboard box which is labeled "Universal Waste Lamps" and placed in a designated area. These bulbs are periodically sent for recycle to the City of Portland Riverside Recycling Center. No other Universal Waste items are generated under normal operating conditions.

E. Perry accumulates well below 200 Universal Waste Items at any one time. Therefore, E. Perry's Universal Waste Program is designed to comply with the Reduced Requirements for Small Universal Waste Generators.

SOLD MATERIAL RECORD YEAR TO DATE 2007	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	YEAR TO DATE TOTALS
A-286	663	-	-	-	-	389	-	-	-	-	-	-	1,052
ALUMINUM, CAST	17,800	20,200	23,120	20,950	61,710	25,460	55,860	29,580	34,030	32,790	28,740	-	350,030
ALUMINUM, E.C. WIRE	2,050	-	-	2,061	-	1,154	4,812	-	-	-	-	-	10,077
ALUMINUM, EXTRUSION	82,661	9,100	28,810	-	12,299	10,300	21,119	21,211	10,992	28,116	8,185	-	230,793
ALUMINUM, 6061 EXTRUSION	21,943	-	-	-	24,611	-	38,493	-	27,001	-	89,394	-	181,442
ALUMINUM, IRONY	-	37,200	-	57,400	86,460	42,930	41,320	35,860	49,390	71,430	-	83,760	505,760
ALUMINUM, LITHO	5,540	-	12,920	-	11,904	-	13,489	-	-	16,343	-	-	60,196
ALUMINUM, MLC	19,890	-	18,030	-	16,289	-	39,393	-	15,318	-	-	-	108,720
ALUMINUM, OLD	66,863	75,570	58,880	40,700	117,925	121,900	136,140	75,422	125,418	98,765	94,092	41,474	1,051,148
ALUMINUM, REMELT	20,076	-	-	4,765	-	-	-	-	6,435	-	-	-	31,276
ALUMINUM, SIDING	13,864	-	11,400	-	11,477	-	-	-	26,773	32,583	-	-	96,097
ALUMINUM, UBC	-	1,817	-	1,580	-	3,980	776	2,414	1,100	-	-	-	11,667
ALUMINUM, WHEELS	132,009	30,700	39,500	41,302	40,877	30,218	64,927	80,570	41,088	-	46,422	-	547,613
BATTERIES, AUTO	39,900	125,500	-	40,922	126,561	79,492	73,848	68,550	76,485	68,713	36,200	86,900	813,171
BATTERIES, INDUSTRIAL	3,340	-	-	1,728	-	-	3,817	9,339	12,760	7,273	15,850	2,900	36,940
BRASS, PIPE	-	-	-	-	-	-	8,921	-	-	-	-	-	8,921
BRASS, ROD	3,610	-	-	-	-	-	3,234	-	-	-	-	-	6,844
BRASS, YELLOW	53,627	-	36,890	99,395	34,398	-	9,410	49,161	250	45,622	35,730	-	304,481
CARBIDE	-	-	417	-	-	-	1,017	-	278	-	1,243	-	2,955
COMPOSITION	46,065	-	25,360	17,931	-	47,498	3,701	30,208	27,723	7,795	-	-	206,279
COPPER, #1	102,570	42,890	30,161	-	39,441	42,010	40,078	40,329	-	20,882	-	-	358,331
COPPER, #2	110,474	-	29,212	40,342	-	70,075	24,624	26,021	36,344	66,283	-	-	403,376
COPPER, BARE BRITE	154,206	34,617	8,787	73,625	40,493	38,398	37,454	40,917	-	90,871	40,048	-	559,414
COPPER, LEADED LITE	-	-	-	-	-	2,656	-	-	2,461	8,531	-	-	13,548
COPPER, LITE	16,459	-	11,700	3,195	-	10,880	-	7,527	1,997	10,333	-	-	61,891
CU-NI, 70/30	777	360	-	-	-	-	676	-	-	-	-	-	1,813
CU-NI, 90/10	-	-	928	-	-	-	-	1,065	-	-	-	-	1,993
HASTEALLOY	50	182	-	-	-	-	-	-	-	-	-	-	232
HEATER CORES	430	1,580	-	1,212	-	-	1,551	-	715	1,120	-	-	6,608
INCONEL	624	664	-	-	-	684	516	-	-	-	-	-	2,488
INSULATED WIRE, ACSR	-	10,000	5,140	8,556	7,680	9,200	8,334	-	12,487	9,910	6,290	4,820	82,417
INSULATED WIRE, #1 COPPER	-	3,400	-	-	-	-	-	58,415	75,104	780	750	-	138,449
INSULATED WIRE, #2 COPPER	33,420	36,950	37,870	46,104	102,390	114,846	99,756	5,090	8,445	73,750	65,000	33,840	657,461
LEAD, REGULAR	14,630	3,900	7,080	13,461	2,795	-	4,708	6,970	3,250	10,866	12,415	-	79,075
LEAD, WEIGHTS	2,977	-	-	-	-	-	-	4,470	-	4,276	6,651	3,866	22,240
MONEL	1,130	1,106	320	-	-	-	1,346	-	-	-	-	-	3,902
NICKEL	1,202	963	-	-	-	1,255	1,034	-	-	-	-	-	4,454
PEWTER	-	-	130	-	-	-	-	-	-	-	-	-	130
RADIATORS, ALUMINUM	-	36,350	-	30,235	5,920	-	11,173	-	-	-	39,987	-	117,695
RADIATORS, AUTO	31,170	40,360	14,872	19,196	-	36,741	28,945	9,588	10,650	33,668	-	-	226,170
RADIATORS, AUTO - DIRTY	-	-	-	800	-	-	-	-	-	-	-	-	800
RADIATORS, COPPER/ALUMINUM FINS	1,643	8,770	-	8,949	17,112	5,060	7,450	4,610	12,567	12,860	6,160	3,900	89,081
STAINLESS STEEL, 17-4	-	1,416	-	-	5,400	-	-	-	-	7,140	-	-	13,956
STAINLESS STEEL, 304	95,490	60,430	51,080	47,500	103,082	50,600	5,666	12,655	4,550	6,380	5,570	-	442,943
STAINLESS STEEL, 316	3,435	-	19,760	5,352	3,885	8,602	3,825	1,783	2,605	-	2,080	-	45,527
STAINLESS STEEL, P-530	9,452	9,720	-	-	-	-	516	-	-	2,640	-	-	22,328
STEEL, #1	308,340	79,740	313,880	227,900	347,740	435,284	516,210	532,250	338,010	384,960	387,598	339,220	4,211,132
STEEL/IRON, CAST	-	-	-	-	-	-	-	-	-	-	-	-	-
STEEL, ELECTRIC MOTORS	3,600	61,440	-	57,390	81,390	-	-	11,200	57,250	92,950	11,100	-	316,320
STEEL, LITE	213,790	97,930	123,260	184,970	179,640	256,880	52,400	232,160	236,350	211,360	274,260	169,320	2,232,290
STEEL, P&S	-	51,120	72,940	86,920	39,100	115,660	210,060	37,280	41,080	85,390	-	87,080	826,630
TIN	-	-	1,253	-	-	-	-	-	-	-	-	-	1,253
TITANIUM	1,297	-	-	-	-	-	-	-	-	-	-	-	1,297
TURNINGS, A-286	2,857	2,530	704	-	-	1,804	1,305	-	-	1,200	-	-	10,400
TURNINGS, ALUMINUM	8,120	34,600	3,420	40,250	3,962	3,917	25,900	-	29,080	-	-	-	149,249
TURNINGS, BRASS	6,202	-	-	9,892	-	-	-	1,560	-	-	8,180	-	25,824
TURNINGS, ROD BRASS	20,500	-	-	-	-	27,500	-	-	-	-	-	-	48,000
TURNINGS, COPPER	970	-	920	-	-	-	-	9,961	370	-	-	-	12,241
TURNINGS, CU-NI - 70/30	1,200	-	-	-	-	1,324	-	-	-	1,550	-	-	4,074
TURNINGS, CU-NI - 90/10	-	-	-	-	-	-	-	-	-	-	-	-	-
TURNINGS, HASTEALLOY	314	182	-	-	-	-	-	-	-	2,966	-	-	3,462
TURNINGS, INCONEL	1,390	3,713	-	-	-	5,187	1,036	-	-	5,580	-	-	16,886
TURNINGS, MONEL	3,757	5,453	1,800	-	-	833	455	-	-	1,610	-	-	13,908
TURNINGS, NICKEL	3,528	824	-	-	-	1,165	4,745	-	-	2,889	-	-	13,149
TURNINGS, NI-TI	1,644	1,240	670	-	-	1,570	1,173	-	-	1,710	-	-	9,007
TURNINGS, STAINLESS STEEL - 13-8	-	808	656	-	-	915	760	-	-	2,175	-	-	5,314
TURNINGS, STAINLESS STEEL - 17-4	28,975	15,550	11,980	15,250	16,760	8,220	25,525	14,874	3,100	3,559	-	-	143,693
TURNINGS, STAINLESS STEEL - 304	15,390	7,330	4,880	8,176	-	5,017	40,446	4,043	35,900	2,520	5,520	-	128,002
TURNINGS, STAINLESS STEEL - 316	24,686	5,060	6,860	18,374	3,971	9,406	18,087	16,979	11,910	11,325	7,674	-	134,332
TURNINGS, STAINLESS STEEL - P-530	48,580	6,820	11,610	13,820	11,337	-	32,349	14,395	10,020	-	2,520	-	151,451
TURNINGS, STEEL	-	-	53,620	48,000	39,840	-	-	109,900	-	-	43,940	-	295,300
TURNINGS, TITANIUM	4,202	1,470	-	-	-	3,668	3,769	493	-	680	-	-	14,282
ZINC	-	3,024	-	-	2,100	1,315	-	9,560	5,590	-	-	1,620	23,149

METALS RECEIVED AT E. PERRY IRON & METAL, 2007

(quantities in pounds)

GRO (Maine HETL Method 4.2.17). The wells will be sampled once a year and a report will be submitted to the City.

C. Equipment

A list of currently active equipment is attached.

D. Recommended Changes

E. Perry will begin implementing a groundwater monitoring program.

8. Provide a summary of universal waste handling activities at the transfer station.

E. Perry does not receive universal waste from its customers. E. Perry uses fluorescent bulbs to light their warehouse and office areas. Bulbs which have burned out are placed in a cardboard box which is labeled "Universal Waste Lamps" and placed in a designated area. These bulbs are periodically sent for recycle to the City of Portland Riverside Recycling Center. No other Universal Waste items are generated under normal operating conditions.

E. Perry accumulates well below 200 Universal Waste Items at any one time. Therefore, E. Perry's Universal Waste Program is designed to comply with the Reduced Requirements for Small Universal Waste Generators.

New Hire Safety Checklist

Employee Name: _____

Hire Date: _____

Dept.: _____

Supervisor: _____

Employee Signature: _____

-
- Receive and review general job description/requirements (prior to first day of employment)
 - Inform employee of appropriate work attire and protective gear (provided if applicable)
 - Administer employee handbook
 - o Sign acknowledgement that handbook was received and reviewed
 - Review appropriate lifting techniques and materials handling
 - Review rules of good housekeeping in work areas
 - Comprehension of yard safety; familiarize with facility and surroundings; areas to avoid when work is in progress.
 - Overview of equipment and vehicles that will be used.
 - Distribution of Forklift operation and safety manual.
 - Operator's ability to perform check-sheet inspection for safe operation of truck prior to use.
 - Satisfactory completion of forklift driving examination (required to be an authorized forklift operator at E. Perry).
 - Knowledge of injury reporting & treatment
 - o If any injury does occur on the job report immediately to supervisor
 - o Treatment by designated physician (Concentra) if necessary

E. PERRY IRON & METAL CO., INC.

EQUIPMENT SCHEDULE

YEAR	OUR #	DESCRIPTION	SERIAL #	YEAR PURCHASED	PURCHASED NEW/USED
1962	C1	LINK BELT LS98 BOOM CRANE	9LR2269	1970	USED
		CRANE MAGNET			USED
1970	C2	LINK BELT LS98A BOOM CRANE	9LRA3918	1985	USED
		CRANE MAGNET			
1982	C3	LINK BELT LS2800A EXCAVATOR WITH HYDRAULIC GRAPPLE	35H2257A	1997	USED
1999	C4	KOMATSU PC300 LC-6 EXCAVATOR WITH HYDRAULIC GRAPPLE	A89272	2004	USED
1971		ALLIS CHALMERS FRONT END LOADER	?	1982	USED
		TOYOTA 1.5 TON FORKLIFT	?	1982	USED
		PETTI BONE 4WX FRONT END LOADER	?	1982	USED
1984	P2	SELCO VERTICAL BAILING MACHINE VAL 4.5	0584157	1985	NEW
1988	P3	PHILADELPHIA VERTICAL BAILING MACHINE	88T6047	1989	USED
	P4	ECONOMY CHAIN BAILING PRESS	57429	1980	USED
	P5	PIQUA VERTICAL BAILING PRESS	?	1982	USED
2000	P7	ATLAS HORIZONTAL BAILING PRESS	126348	2000	NEW
1990	P8	LORAN VERTICAL BAILING MACHINE	LR-147	2001	USED
1985	P9	ATLAS VERTICAL BAILER	126348	2004	USED
2007	ST2	STRIPTECH WIRE STRIPPER - MODEL 5000	3066	2007	NEW
2008		METTLER TOLEDO TRUCK SCALE (PORTLAND)	1155962-1AK (SCALE) 01219206LJ (DISPLAY)	2008	NEW
		TRUCK SCALE (SCARBOROUGH)	?	1982	USED
		HOWE PLATFORM SCALE	?	1993	NEW
		HOWE PLATFORM SCALE	?	1993	NEW
1988	F2	CLARK GP-S30 FORKLIFT	GP138MB-125-6925KOF	1989	NEW
1995	F7	CLARK CGP25 FORKLIFT WITH ROTATING FORKS	P365L-0857-9396	1999	USED
1999	F8	TOYOTA 42-8FGCU15 FORKLIFT WITH ROTATING FORKS	68306	1999	NEW
2003	F10	TOYOTA 7FGU30 FORKLIFT	64204	2003	NEW
2006	F11	TOYOTA 8FGCU25 FORKLIFT	10125	2007	NEW
2006	F12	TOYOTA 8FGCU15 FORKLIFT WITH ROTATING FORKS	10073	2007	NEW
2001	SS4	GEHL SL4635SX SKIDSTEER	301560	2001	NEW
2001	SS5	GEHL SL4635SX SKIDSTEER	28251	2005	USED
2006	SS6	GEHL SL4640E SKIDSTEER	04640P00308721	2007	NEW
1998	SH1	GENSCO 12" 306LS HYDRAULIC SHEAR		1998	NEW
1999	SH2	MCINTYRE MODEL 407 HYDRAULIC SHEAR		1999	NEW
2000	SH3	MCINTYRE MODEL 407 HYDRAULIC SHEAR	607-00	2000	NEW
2007		MACK GRAPPLE (OPSIHDCR-100-4)	12671	2007	NEW

New Hire Safety Checklist

Employee Name: _____
Hire Date: _____
Dept.: _____
Supervisor: _____
Employee Signature: _____

- Receive and review general job description/requirements (prior to first day of employment)
- Inform employee of appropriate work attire and protective gear (provided if applicable)
- Administer employee handbook
 - o Sign acknowledgement that handbook was received and reviewed
- Review appropriate lifting techniques and materials handling
- Review rules of good housekeeping in work areas
- Comprehension of yard safety; familiarize with facility and surroundings; areas to avoid when work is in progress.
- Overview of equipment and vehicles that will be used.
- Distribution of Forklift operation and safety manual.
- Operator's ability to perform check-sheet inspection for safe operation of truck prior to use.
- Satisfactory completion of forklift driving examination (required to be an authorized forklift operator at E. Perry).
- Knowledge of injury reporting & treatment
 - o If any injury does occur on the job report immediately to supervisor
 - o Treatment by designated physician (Concentra) if necessary

Table 3-2
 Summary of Exploration Activities
 E. Perry Site
 Portland, Maine

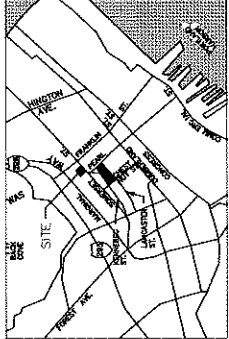
Boring ID	Monitoring Well ID	Completion Date	Total Boring Depth (ft bgs)	Screen Length (ft)	Screened Interval (ft bgs)	Depth to Water (ft bgs)	Fill/Natural Material Interface (ft bgs)
155 Lancaster Street							
B-A	MW-A	04/26/2005	16	10	3-13	4.0	6.4
B-B	MW-B	04/26/2005	16	10	4-14	8.0	8.0
B-C	MW-C	04/26/2005	16	10	5-15	8.0	11.6
B-D	MW-D	04/26/2005	14	10	4-14	8.0	10.7
B-E	MW-E	04/26/2005	20	10	5-15	7.5	8.4
SS-A	n/a	04/26/2005	4	n/a	n/a	>4	>4
SS-B	n/a	04/26/2005	4	n/a	n/a	>4	>4
SS-C	n/a	04/26/2005	4	n/a	n/a	>4	>4
9 Somerset Street							
B-1	n/a	04/27/2005	4	n/a	n/a	>4	3.8
B-2	n/a	04/27/2005	4	n/a	n/a	>4	2.8
B-3	MW-3	04/27/2005	12	10	2-12	3.5	2.9
B-4	n/a	04/27/2005	4	n/a	n/a	>4	>4
B-5	MW-5	04/27/2005	12	10	2-12	3.5	6.7
B-6	MW-6	04/28/2005	13	10	3-13	4.0	4.5
B-7	MW-7	04/29/2005	13	10	3-13	4.0	3.5
B-8	MW-8	04/29/2005	13	10	3-13	4.0	3.5
B-9	MW-9	04/28/2005	14	10	4-14	n/a	1.5
B-10	n/a	04/28/2005	4	n/a	n/a	>4	1.1
B-11	MW-11	04/29/2005	14	10	4-14	7.5	<4
SS-1	n/a	04/28/2005	4	n/a	n/a	>4	2.9
SS-2	n/a	04/28/2005	4	n/a	n/a	>4	3
SS-3	n/a	04/28/2005	4	n/a	n/a	>4	2.6
SS-4	n/a	04/28/2005	4	n/a	n/a	>4	3
SS-5	n/a	04/28/2005	4	n/a	n/a	>4	2.6
SS-6	n/a	04/28/2005	4	n/a	n/a	>4	3

Notes:
 ft bgs = feet below ground surface
 n/a = not applicable

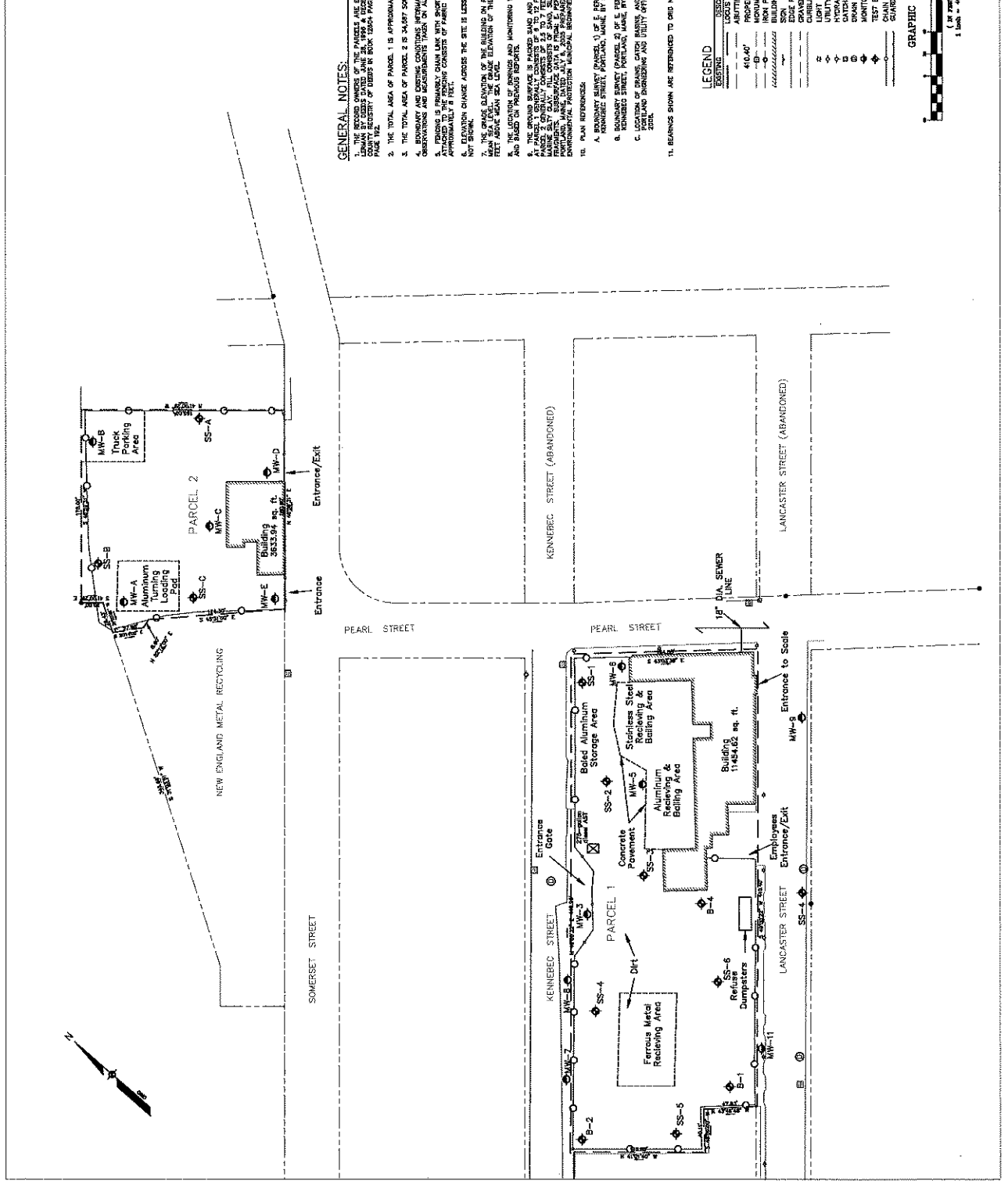
REV#	DATE	STATUS

REV#	DATE	STATUS

REV#	DATE	STATUS



LOCATION MAP

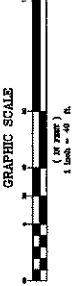


GENERAL NOTES:

1. MONITORING WELLS (MW) AND SAMPLING STATIONS (SS) WERE INSTALLED IN PARCELS 1 AND 2 ON FEBRUARY 24, 2008. MONITORING WELLS WERE INSTALLED AT THE FOLLOWING LOCATIONS: MW-A, MW-B, MW-C, MW-D, MW-E, MW-F, MW-G, MW-H, MW-I, MW-J, MW-K, MW-L, MW-M, MW-N, MW-O, MW-P, MW-Q, MW-R, MW-S, MW-T, MW-U, MW-V, MW-W, MW-X, MW-Y, MW-Z, MW-AA, MW-AB, MW-AC, MW-AD, MW-AE, MW-AF, MW-AG, MW-AH, MW-AI, MW-AJ, MW-AK, MW-AL, MW-AM, MW-AN, MW-AO, MW-AP, MW-AQ, MW-AR, MW-AS, MW-AT, MW-AU, MW-AV, MW-AW, MW-AX, MW-AY, MW-AZ, MW-BA, MW-BB, MW-BC, MW-BD, MW-BE, MW-BF, MW-BG, MW-BH, MW-BI, MW-BJ, MW-BK, MW-BL, MW-BM, MW-BN, MW-BO, MW-BP, MW-BQ, MW-BR, MW-BS, MW-BT, MW-BU, MW-BV, MW-BW, MW-BX, MW-BY, MW-BZ, MW-CA, MW-CB, MW-CC, MW-CD, MW-CE, MW-CF, MW-CG, MW-CH, MW-CI, MW-CJ, MW-CK, MW-CL, MW-CM, MW-CN, MW-CO, MW-CP, MW-CQ, MW-CR, MW-CS, MW-CT, MW-CU, MW-CV, MW-CW, MW-CX, MW-CY, MW-CZ, MW-DA, MW-DB, MW-DC, MW-DD, MW-DE, MW-DF, MW-DG, MW-DH, MW-DI, MW-DJ, MW-DK, MW-DL, MW-DM, MW-DN, MW-DO, MW-DP, MW-DQ, MW-DR, MW-DS, MW-DT, MW-DU, MW-DV, MW-DW, MW-DX, MW-DY, MW-DZ, MW-EA, MW-EB, MW-EC, MW-ED, MW-EE, MW-EF, MW-EG, MW-EH, MW-EI, MW-EJ, MW-EK, MW-EL, MW-EM, MW-EN, MW-EO, MW-EP, MW-EQ, MW-ER, MW-ES, MW-ET, MW-EU, MW-EV, MW-EW, MW-EX, MW-EY, MW-EZ, MW-FA, MW-FB, MW-FC, MW-FD, MW-FE, MW-FG, MW-FH, MW-FI, MW-FJ, MW-FK, MW-FL, MW-FM, MW-FN, MW-FO, MW-FP, MW-FQ, MW-FR, MW-FS, MW-FT, MW-FU, MW-FV, MW-FW, MW-FX, MW-FY, MW-FZ, MW-GA, MW-GB, MW-GC, MW-GD, MW-GE, MW-GF, MW-GG, MW-GH, MW-GI, MW-GJ, MW-GK, MW-GL, MW-GM, MW-GN, MW-GO, MW-GP, MW-GQ, MW-GR, MW-GS, MW-GT, MW-GU, MW-GV, MW-GW, MW-GX, MW-GY, MW-GZ, MW-HA, MW-HB, MW-HC, MW-HD, MW-HE, MW-HF, MW-HG, MW-HH, MW-HI, MW-HJ, MW-HK, MW-HL, MW-HM, MW-HN, MW-HO, MW-HP, MW-HQ, MW-HR, MW-HS, MW-HT, MW-HU, MW-HV, MW-HW, MW-HX, MW-HY, MW-HZ, MW-IA, MW-IB, MW-IC, MW-ID, MW-IE, MW-IF, MW-IG, MW-IH, MW-II, MW-IJ, MW-IK, MW-IL, MW-IM, MW-IN, MW-IO, MW-IP, MW-IQ, MW-IR, MW-IS, MW-IT, MW-IU, MW-IV, MW-IW, MW-IX, MW-IY, MW-IZ, MW-JA, MW-JB, MW-JC, MW-JD, MW-JE, MW-JF, MW-JG, MW-JH, MW-JI, MW-JJ, MW-JK, MW-JL, MW-JM, MW-JN, MW-JO, MW-JP, MW-JQ, MW-JR, MW-JS, MW-JT, MW-JU, MW-JV, MW-JW, MW-JX, MW-JY, MW-JZ, MW-KA, MW-KB, MW-KC, MW-KD, MW-KE, MW-KF, MW-KG, MW-KH, MW-KI, MW-KJ, MW-KK, MW-KL, MW-KM, MW-KN, MW-KO, MW-KP, MW-KQ, MW-KR, MW-KS, MW-KT, MW-KU, MW-KV, MW-KW, MW-KX, MW-KY, MW-KZ, MW-LA, MW-LB, MW-LC, MW-LD, MW-LE, MW-LF, MW-LG, MW-LH, MW-LI, MW-LJ, MW-LK, MW-LL, MW-LM, MW-LN, MW-LO, MW-LP, MW-LQ, MW-LR, MW-LS, MW-LT, MW-LU, MW-LV, MW-LW, MW-LX, MW-LY, MW-LZ, MW-MA, MW-MB, MW-MC, MW-MD, MW-ME, MW-MF, MW-MG, MW-MH, MW-MI, MW-MJ, MW-MK, MW-ML, MW-MN, MW-MO, MW-MP, MW-MQ, MW-MR, MW-MS, MW-MT, MW-MU, MW-MV, MW-MW, MW-MX, MW-MY, MW-MZ, MW-NA, MW-NB, MW-NC, MW-ND, MW-NE, MW-NF, MW-NG, MW-NH, MW-NI, MW-NJ, MW-NK, MW-NL, MW-NM, MW-NO, MW-NP, MW-NQ, MW-NR, MW-NS, MW-NT, MW-NU, MW-NV, MW-NW, MW-NX, MW-NY, MW-NZ, MW-OA, MW-OB, MW-OC, MW-OD, MW-OE, MW-OF, MW-OG, MW-OH, MW-OI, MW-OJ, MW-OK, MW-OL, MW-OM, MW-ON, MW-OO, MW-OP, MW-OQ, MW-OR, MW-OS, MW-OT, MW-OU, MW-OV, MW-OW, MW-OX, MW-OY, MW-OZ, MW-PA, MW-PB, MW-PC, MW-PD, MW-PE, MW-PF, MW-PG, MW-PH, MW-PI, MW-PJ, MW-PK, MW-PL, MW-PM, MW-PN, MW-PO, MW-PP, MW-PQ, MW-PR, MW-PS, MW-PT, MW-PU, MW-PV, MW-PW, MW-PX, MW-PY, MW-PZ, MW-QA, MW-QB, MW-QC, MW-QD, MW-QE, MW-QF, MW-QG, MW-QH, MW-QI, MW-QJ, MW-QK, MW-QL, MW-QM, MW-QN, MW-QO, MW-QP, MW-QQ, MW-QR, MW-QS, MW-QT, MW-QU, MW-QV, MW-QW, MW-QX, MW-QY, MW-QZ, MW-RA, MW-RB, MW-RC, MW-RD, MW-RE, MW-RF, MW-RG, MW-RH, MW-RI, MW-RJ, MW-RK, MW-RL, MW-RM, MW-RN, MW-RO, MW-RP, MW-RQ, MW-RR, MW-RS, MW-RT, MW-RU, MW-RV, MW-RW, MW-RX, MW-RY, MW-RZ, MW-SA, MW-SB, MW-SC, MW-SD, MW-SE, MW-SF, MW-SG, MW-SH, MW-SI, MW-SJ, MW-SK, MW-SL, MW-SM, MW-SN, MW-SO, MW-SP, MW-SQ, MW-SR, MW-SS, MW-ST, MW-SU, MW-SV, MW-SW, MW-SX, MW-SY, MW-SZ, MW-TA, MW-TB, MW-TC, MW-TD, MW-TE, MW-TF, MW-TG, MW-TH, MW-TI, MW-TJ, MW-TK, MW-TL, MW-TM, MW-TN, MW-TO, MW-TP, MW-TQ, MW-TR, MW-TS, MW-TT, MW-TV, MW-TW, MW-TX, MW-TY, MW-TZ, MW-UA, MW-UB, MW-UC, MW-UD, MW-UE, MW-UF, MW-UG, MW-UH, MW-UI, MW-UJ, MW-UK, MW-UL, MW-UM, MW-UN, MW-UO, MW-UP, MW-UQ, MW-UR, MW-US, MW-UT, MW-UU, MW-UV, MW-UW, MW-UX, MW-UY, MW-UZ, MW-VA, MW-VB, MW-VC, MW-VD, MW-VE, MW-VF, MW-VG, MW-VH, MW-VI, MW-VJ, MW-VK, MW-VL, MW-VM, MW-VN, MW-VO, MW-VP, MW-VQ, MW-VR, MW-VS, MW-VT, MW-VU, MW-VV, MW-VW, MW-VX, MW-VY, MW-VZ, MW-WA, MW-WB, MW-WC, MW-WD, MW-WE, MW-WF, MW-WG, MW-WH, MW-WI, MW-WJ, MW-WK, MW-WL, MW-WM, MW-WN, MW-WO, MW-WP, MW-WQ, MW-WR, MW-WS, MW-WT, MW-WU, MW-WV, MW-WW, MW-WX, MW-WY, MW-WZ, MW-XA, MW-XB, MW-XC, MW-XD, MW-XE, MW-XF, MW-XG, MW-XH, MW-XI, MW-XJ, MW-XK, MW-XL, MW-XM, MW-XN, MW-XO, MW-XP, MW-XQ, MW-XR, MW-XS, MW-XT, MW-XU, MW-XV, MW-XW, MW-XX, MW-XY, MW-XZ, MW-YA, MW-YB, MW-YC, MW-YD, MW-YE, MW-YF, MW-YG, MW-YH, MW-YI, MW-YJ, MW-YK, MW-YL, MW-YM, MW-YN, MW-YO, MW-YP, MW-YQ, MW-YR, MW-YS, MW-YT, MW-YU, MW-YV, MW-YW, MW-YX, MW-YY, MW-YZ, MW-ZA, MW-ZB, MW-ZC, MW-ZD, MW-ZE, MW-ZF, MW-ZG, MW-ZH, MW-ZI, MW-ZJ, MW-ZK, MW-ZL, MW-ZM, MW-ZN, MW-ZO, MW-ZP, MW-ZQ, MW-ZR, MW-ZS, MW-ZT, MW-ZU, MW-ZV, MW-ZW, MW-ZX, MW-ZY, MW-ZZ.

LEGEND

SYMBOL	DESCRIPTION
---	EXISTING
---	LOCAL PROPERTY/ROW
---	ABUTTING PROPERTY/ROW
---	PROPERTY DIMENSION
---	MONUMENT
---	BOUNDARY
---	ROAD
---	GRAVEL ROAD
---	DRIVEWAY
---	UTILITY TIE
---	HYDRANT
---	CATCH BASIN
---	MONITORING WELL
---	TEST BORING
---	CHAIN LINK FENCE
---	BOUNDARY



1. MONUMENTS SHOWN ARE REFERENCED TO GRID NORTH.

Table 3-2
 Summary of Exploration Activities
 E. Perry Site
 Portland, Maine

Boring ID	Monitoring Well ID	Completion Date	Total Boring Depth (ft bgs)	Screen Length (ft)	Screened Interval (ft bgs)	Depth to Water (ft bgs)	Fill/Natural Material Interface (ft bgs)
155 Lancaster Street							
B-A	MW-A	04/26/2005	16	10	3-13	4.0	6.4
B-B	MW-B	04/26/2005	16	10	4-14	8.0	8.0
B-C	MW-C	04/26/2005	16	10	5-15	8.0	11.6
B-D	MW-D	04/26/2005	14	10	4-14	8.0	10.7
B-E	MW-E	04/26/2005	20	10	5-15	7.5	8.4
SS-A	n/a	04/26/2005	4	n/a	n/a	>4	>4
SS-B	n/a	04/26/2005	4	n/a	n/a	>4	>4
SS-C	n/a	04/26/2005	4	n/a	n/a	>4	>4
9 Somerset Street							
B-1	n/a	04/27/2005	4	n/a	n/a	>4	3.8
B-2	n/a	04/27/2005	4	n/a	n/a	>4	2.8
B-3	MW-3	04/27/2005	12	10	2-12	3.5	2.9
B-4	n/a	04/27/2005	4	n/a	n/a	>4	>4
B-5	MW-5	04/27/2005	12	10	2-12	3.5	6.7
B-6	MW-6	04/28/2005	13	10	3-13	4.0	4.5
B-7	MW-7	04/29/2005	13	10	3-13	4.0	3.5
B-8	MW-8	04/29/2005	13	10	3-13	4.0	3.5
B-9	MW-9	04/28/2005	14	10	4-14	n/a	1.5
B-10	n/a	04/28/2005	4	n/a	n/a	>4	1.1
B-11	MW-11	04/29/2005	14	10	4-14	7.5	<4
SS-1	n/a	04/28/2005	4	n/a	n/a	>4	2.9
SS-2	n/a	04/28/2005	4	n/a	n/a	>4	3
SS-3	n/a	04/28/2005	4	n/a	n/a	>4	2.6
SS-4	n/a	04/28/2005	4	n/a	n/a	>4	3
SS-5	n/a	04/28/2005	4	n/a	n/a	>4	2.6
SS-6	n/a	04/28/2005	4	n/a	n/a	>4	3

Notes:
 ft bgs = feet below ground surface
 n/a = not applicable