

Della Land Corp.

P. O. Box 334
656 Goodwin Road
Eliot, ME 03903-0334
207-439-3229

Renaud5111@comcast.net

June 20, 2018

To: Dana Lee, Town Manager
Heather Ross, Code Enforcement Officer + LPI
Emily Cole-Prescott, Planner
Town of Eliot
1333 State Road
Eliot, Maine 03903

Re: Della Land Corp. / Great Hill Fill and Gravel

I would like to start off by thanking each of you for your time, and meeting with Bill and me on Tuesday June 5, 2018. It was a pleasure to meet all of you.

The goal of the meeting was to share who we are, what we do, and clarify some public misunderstandings and or misperceptions about our company, Della Land Corp., and our facility, Great Hill Fill and Gravel, located in Eliot, Maine. In doing so, we hope to alleviate some of the concerns of not only our immediate neighbors, but also the town.

As we discussed, the working gravel pit was originally established back in the 1970's, by a former owner / company, and was not acquired by Della Land Corp. until 2004. William A. Renaud Jr., owner of Della Land Corp. as well as William A. Renaud Jr. Trucking, Inc., previously worked with those original owners for approximately 15 years prior to the 2004 purchase, and over that time, he became knowledgeable of what work was needed going forward to complete the reclamation portion of the property which the Main DES identified as subject to its regulation. In 2004 Della purchased both the grandfathered portion of the pit and the regulated portion consisting of a total of 70+ acres. Purchasing the property was two-fold, 16-17 acres out of the whole 70 acres would continue to be reclaimed, (licensed and monitored by the Maine Department of Environmental Protection), and the rest would continue to be used as a working gravel pit.

Della Land Corp. is required to hold a Beneficial Use License that regulates what can and cannot be done in the 16-17 acre reclamation portion of the land. With this license, Della Land Corp. reports to the State of Maine on an annual basis what material is being trucked in and used as part of the reclamation. The most recent report for 2017 is being shared with you and considered attachment A.

All mastic coated material brought to Great Hill as fill for the reclamation as well as all related analytical data was evaluated for compliance by St. Germain & Associates out of Westbrook under the supervision of the DES to ensure the materials being brought in met the specifications of the beneficial use license.

We have also included a description and demonstration, and considered attachment B and C.

This license also requires periodic inspections from the Maine DEP, of the reclamation area. Please see insert / attachment D.

Material that is approved for use on the portion of land being reclaimed can be reviewed in attachment / insert E1-3 as well as material we are not allowed to receive.

As is customary in the trade, dump trucks and trailer trucks have been used to bring material into the pit both to the reclamation area as well as the working portion of the gravel pit. There was a fairly significant volume of truck traffic both prior to and after the 2004 sale to Della Land Corp. through about the end of 2012. This flow of incoming reclamation material allowed Della to pay for the required sloping, and to financially proceed at a steady level reclaiming the beginning phases of the specified areas. Much of this mastic coated material was originating out of Massachusetts. All of this concrete rock and rubble complied with the required maximum level

of 1% of mastic coating by volume, and most of the material contained less than the 1% maximum which has long been the Maine DES approved standard.

We realize that Della has had difficulty sustaining the intended pace of the reclamation and in achieving the scheduled completion date although we have done the best we could. We would offer that the reclamation portion of the land, the 16-17 acres out of the whole 70 acres, is now roughly 70% complete. Please see insert / attachment F.

Currently, a realistic goal for a staged completion of the reclamation which Della can afford would be:

The 10% area –goal is June 2019 (1 year)

The 30% area –goal is June 2020 (2 years)

The first 50 % area –goal is December 2022 (4 ½ years)

The last 50 % area –goal is December 2024 (6 ½ years)

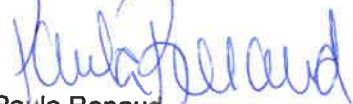
In the past year or so, the economy has somewhat turned around, and although well below the pre-2008 economic levels, we do continue to place concrete rock and rubble (without mastic) to achieve required slopes and contours for the remaining phases of the reclamation area using material we receive from our own local projects. A reasonable timeframe of expected completion is marked accordingly on insert / attachment F.

We of course fully understand the concern for clean subsurface and residential drinking water both in general and in residential wells in the immediate area. We took action long ago to contain runoff and siltation from the gravel pit areas. Early on Della Land Corp. hired an engineering company to design a 100 year flood retention pond to ensure that no water leaves the reclamation site. At the towns "suggestion," and although not required by the Maine DES, we are looking into the possibility and feasibility of installing a single test well on the Della property to monitor the ground water, but it is important to note that we have been informed that Maine DES analysis and perhaps also neighboring property testing shows that no contamination is arising from the Della property.

Since photos of the entire site do not fully convey a complete picture and understanding of the entire Gravel Pit area, including the limited reclamation portion, we recently invited the Town Manager, Dana Lee, who did make a personal visit with us to Great Hill Fill and Gravel. During his tour of the property, he was able to get a more complete visual of the pit, the huge scope of the reclamation project, and what work is being performed in the reclamation portion and the gravel pit area.

It is our hope that the above is informative and satisfactory to all of you, as well as the citizens of Eliot.

Respectfully submitted,



Paula Renaud
Della Land Corp.

Cc: John Ahlgren, Esq. Hoefle, Phoenix, Gormley and Roberts, P.A., Portsmouth, N H

Attn: Geraldine Travers
17 State House Station
Augusta, Maine 04333

Annual Report Form
for facilities with
SOLID WASTE PROCESSING LICENSES
including those with **BENEFICIAL USE LICENSES**

For YEAR: 2007

Name of Facility: Della Land Corp

Location address: 656 Currier Road (PO Box 334) Ellid, Maine 03903

E-mail: Gerald511@comcast.net

DEP Processing Facility License Number(s):

S- 000390-WL-A-N
S- _____
S- _____
S- _____
S- _____

DEP Beneficial Use License Number(s):

S- 000390-WL-A-N
S- _____
S- _____
S- _____
S- _____

Facility Operator: Della Land Corp. Email: Gerald511@comcast.net Phone: 207-439-3228

Facility Operator mailing address: PO Box 334 Ellid, Maine 03903

Contractor Contact: William A. Bernard Jr. Email: Gerald511@comcast.net Phone: 207-384-5111

Billing Contact: William A. Bernard Jr. Email: Gerald511@comcast.net Phone: 207-384-5111

1. Description of all wastes accepted at the facility:

A. Enter the number or description of each waste type received and the amount (by weight) of each waste type by state or province of origin. If measured weight is not available, indicate waste volume and density used to calculate weight entered in the "Explanatory notes and comments" field at the bottom of the table. Please attach in-coming shipment records as available.

A

Facility: Della Land Corp.

Reporting Year: 2017

E. **Summary of recyclables and residue wastes shipped.** Enter the description and amounts of any recyclables and wastes that were shipped off-site, and the destination facilities.

Recyclable or waste type (use types as listed in 1.A)	Destination State or Province	Weight	Unit of Measure	Destination facility

F. **Recycling and beneficial use demonstration.** Describe and demonstrate that all wastes accepted at the facility have been recycled or processed into fuel for combustion to the maximum extent practicable. For this demonstration, "recycle" includes but is not limited to: reuse of waste as shaping, grading or alternative daily cover at landfills; aggregate material in construction; and boiler fuel substitutes. This must include:

- A narrative with a detailed comparison of the wastes accepted at the facility, products and secondary materials produced for recycling/reuse, and residues leaving the facility for disposal.
- A calculated recycling rate for the past year, and a discussion of this recycling rate, including a specific explanation of why that rate represents recycling to the maximum extent practicable, and an explanation and justification for why wastes and residues disposed over the preceding year could not be recycled or reused.
- A demonstration that the facility and its operations are consistent with the recycling provisions of the state waste management and recycling plan as defined at 38 M.R.S. § 1303-C(35).

(This item is not applicable to processing facilities that do not generate residues requiring disposal.)

Facility: Della Land Corp.

Reporting Year: 2007

G. **Summary of end-of-year on-site storage.** Enter the amounts of products, recyclables, and wastes stored on site as of 12/31.

Type of product, recyclables and waste stored on site as of 12/31	Weight (tons)	<p>(If converting from cubic yards, use conversion factors from Table 1 of <i>Characterization of Construction/Demolition Debris by the Visual Estimation Method for Use by Solid Waste Processing Facilities</i>, available on-line at www.maine.gov/dep/waste/solidwaste/index.html under "Additional Information and Guidance".</p>

2. Operations

Provide a summary of the processing operation including: a summary of complaints received by the facility during the previous year, a discussion of any odor problems, and any other problems encountered, and follow-up actions taken to address complaints and other identified problems.

At Reclamation

3. Alterations to the facility operations and site

A description of changes to the facility site or operations that have occurred during the reporting year, and as-built plans as applicable. Also, changes to minor aspects of the facility site proposed to be changed in the current year may be described.

Facility: Della Land Camp

Reporting Year: 2007

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

A summary and 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.

Monitoring Results

Monitoring Program

Equipment

Proposed changes (if any)

I have examined this report and to the best of my knowledge and believe, said report is true, correct and complete.

Signature of person completing this form William A. Bernard Jr.

Printed name of person completing this form

William A. Bernard Jr.
PLEASE ATTACH ADDITIONAL PAGES AS NEEDED

DESCRIPTION

Della Land Corp. (Della) proposes to use reclaimed demo debris for the reclamation of the remaining inactive portion of the Great Hill Gravel Pit in Eliot, Maine. Reclaimed demo debris (including poured or block concrete and brick) is produced from the demolition of structures. This material may or may not meet the Maine Department of Environmental Protection's (MEDEP's) definition of inert material, as portions of the concrete and brick may have been coated with a tar-like (asphaltic) mastic material. Pit reclamation activities are limited to the inactive portion of the pit toward the eastern perimeter of the property.

BENEFICIAL USE DEMONSTRATION

The reclaimed demo debris will be used as reclamation material for the inactive portion of the pit that is near the eastern perimeter of the property. The material is comprised of poured or block concrete and brick which may have been coated with a tar-like (asphaltic) mastic material. The reclaimed demo debris is a substitute for inert reclamation materials which include burrow, concrete and brick. Reclaimed demo debris is a suitable substitute for these inert reclamation materials.

As described later in this permit application, beneficial use of reclaimed demo debris will not result in pollution to waters of the state, contaminate ambient air, constitute a health hazard or create a nuisance, and meets all the general standards for beneficial use under Section 3 of Chapter 418.

C

5. Inspections, Monitoring and Reporting

All incoming loads are visually inspected by Renaud staff at the pit. If the load contains materials other than those approved in the plan, the load is rejected and returned to the generator. If the load contains too much metal (i.e., rebar), the load is also rejected and returned to the generator. Because some of the loads of Reclaimed Demo Debris are wrapped in plastic, Renaud removes and stores in 30-yd roll-off containers the plastic wrap from these loads. In addition, any paper, or plastic that is observed in a load is removed by hand and loaded in the 30-yd container. These containers are transported and disposed at the Waste Management landfill in Rochester, New Hampshire. Any metal that is removed from the loads at the pit or that is cut from the concrete at the pit is loaded into separate 30-yd roll-off containers, these containers are transported off site for recycling.

St.Germain has been and will continue to monitor the reclamation activities on behalf of Della. Responsibilities include:

- a) Detailed review and approval of all Reclaimed Demo Debris demolition projects using standard forms and procedures;
- b) Inspections of most demolition sites to observe the material prior to shipment to Great Hill;
- c) Frequent inspections to observe and recommend improved filling procedures, erosion & sedimentation control measures and topsoil manufacturing methods;
- d) Routine visits to observe materials transported to the pit, to set grade stakes, to survey final grades, to collect samples of manufactured topsoil, to sample discharges from detention ponds, to meet with representatives at the gravel pit of the Department of Attorney General, MEDEP or the Town of Eliot;
- e) Communication with the Department of Attorney General, MEDEP, and the Town of Eliot, as necessary;
- f) Amend Gravel Pit Reclamation Plan, as necessary, to propose amendments and/or improvements to the plan such as alternative construction fill materials and revised topsoil manufacturing operations;
- g) Amend gravel pit license, as necessary, to allow for modifications and/or improvements in the operation, final grading, detention of storm water runoff and limits of excavation.
- h) Preparation of Quarterly Summary Reports for the MEDEP. The summary reports will document the pit reclamation progress and include information such as:
 - i) percent complete (estimate)
 - ii) volume estimates of fill used to date
 - iii) volume estimates of topsoil manufactured and placed to date
 - iv) percent seeded
 - v) summary of issues (resolutions) experienced through the previous quarter
 - vi) recommendations for subsequent quarter(s)



Building Demolition Projects
Acceptable/Unacceptable Materials Guidance Document
Great Hill Gravel Pit Reclamation
Della Land Corp.
Elliot, Maine

All materials for Great Hill must be pre-approved prior to shipping in accordance with the Gravel Pit Reclamation Plan (last revised). Contact Della Land Corp. for general questions regarding the project (i.e., hours of operation, directions, etc.). Contact St.Germain & Associates, Inc. for questions regarding acceptable materials and pre-qualification.

Della Land Corp.
Bill Renaud, President
William A. Renaud, Jr. Trucking, Inc.
119 Knights Pond Road
South Berwick, ME 03908
(207) 384-5111

St.Germain & Associates, Inc.
Scott Collins, P.E., Vice President
Patrick Coughlin, Project Manager
St.Germain & Associates, Inc.
846 Main St. – Suite 3
Westbrook, ME 04092
(207) 591-7000

Acceptable Materials:

The following materials may be acceptable for use at Great Hill from building demolition projects:

- Inert fill (i.e., cured concrete, concrete block & brick)
- Mastic coated fabric flashing or masonry, including concrete, concrete block and brick
- Crushed clean porcelain or glass

Materials NOT Acceptable:

The following materials are not acceptable for use at Great Hill from building demolition projects:

- Any of the above acceptable materials contaminated with chemicals, oil, etc.
- Hazardous wastes or hazardous materials of any kind (i.e., mercury-containing lamps, mercury-containing thermostats, PCB ballasts)
- Asbestos-containing materials
 - greater than 1% non-friable asbestos, or any amount of friable asbestos
- Construction and demolition debris
 - No building materials such as wood, metal, wall boards, roofing shingles, plastic or other non-inert fill materials (incidental amounts of metal attached to or inside of concrete and mastic coated concrete are okay)
- Ash
- Asphalt
- Discarded furniture and appliances
- Liquid waste (i.e., oils, chemicals, solvents, etc.)
- Soil (incidental amounts attached to the above acceptable materials is okay)
- PCB waste
- Scrap metal
- Sand blast grit
- Tires
- Vegetative, wood and yard waste (i.e., tree parts, leaves, plant stalks, brush, etc.)
- General trash

All loads destined for Great Hill should not contain any of the materials listed above. All loads are inspected at Great Hill, and if the load contains any of these unacceptable materials, the load will be rejected and returned to the demolition site.

E-1

Section 1 of this plan. A MEDEP-approved deed restriction, requiring that the construction fill or contour layers remain covered in perpetuity, was filed with the York County Registry of Deeds prior to initiation of pit reclamation activities. A copy of the deed restriction (Declaration of Restrictive Covenant) is provided in **Attachment C**.

A brief description of each category of materials is provided below:

Cured Concrete, Concrete Block and Brick

These materials are typically generated from construction and demolition of structures. Exposed rebar will be cut off either at the site of generation or at the gravel pit. Rebar that is cut at the gravel pit will be accumulated in a roll-off container for off site recycling. The following construction and demolition debris will not be accepted and used for construction fill: asphalt, wood, metal, and roofing shingles. The following additional materials will be excluded: special wastes and hazardous wastes as defined in Chapter 400 of *Maine Solid Waste Management Rules*.

Reclaimed Demo Debris

Reclaimed demo debris (including poured or block concrete and brick) is produced from the demolition of structures. This material may or may not meet the MEDEP's definition of inert material, as portions of the concrete and brick may have been coated with a tar-like (asphaltic) mastic material. Analytical testing of the concrete, brick and mastic has confirmed that there is less than one percent asbestos content in the total volume of material. Reclaimed demo debris also includes concrete that contains non-hazardous blast furnace slag, silica fume, and coal ash. Exposed rebar will be cut off either at the site of generation or at the gravel pit. Rebar that is cut at the gravel pit will be accumulated in a roll-off container for off site recycling.

Crushed Clean Glass or Porcelain

Crushed glass and porcelain are typically generated from construction and demolition projects and from industry as a byproduct. Likely sources of this material are listed in Table 1.

Road Ditching Soil and Sand from Winter Sand Clean-up.

Road ditching soil is generated each summer during the cleaning/widening of road ditches. Sand from winter sand clean up is generated each spring during the sweeping of roads for sand that was deposited on the roads from the previous winter. Likely sources of this material are listed in Table 1.

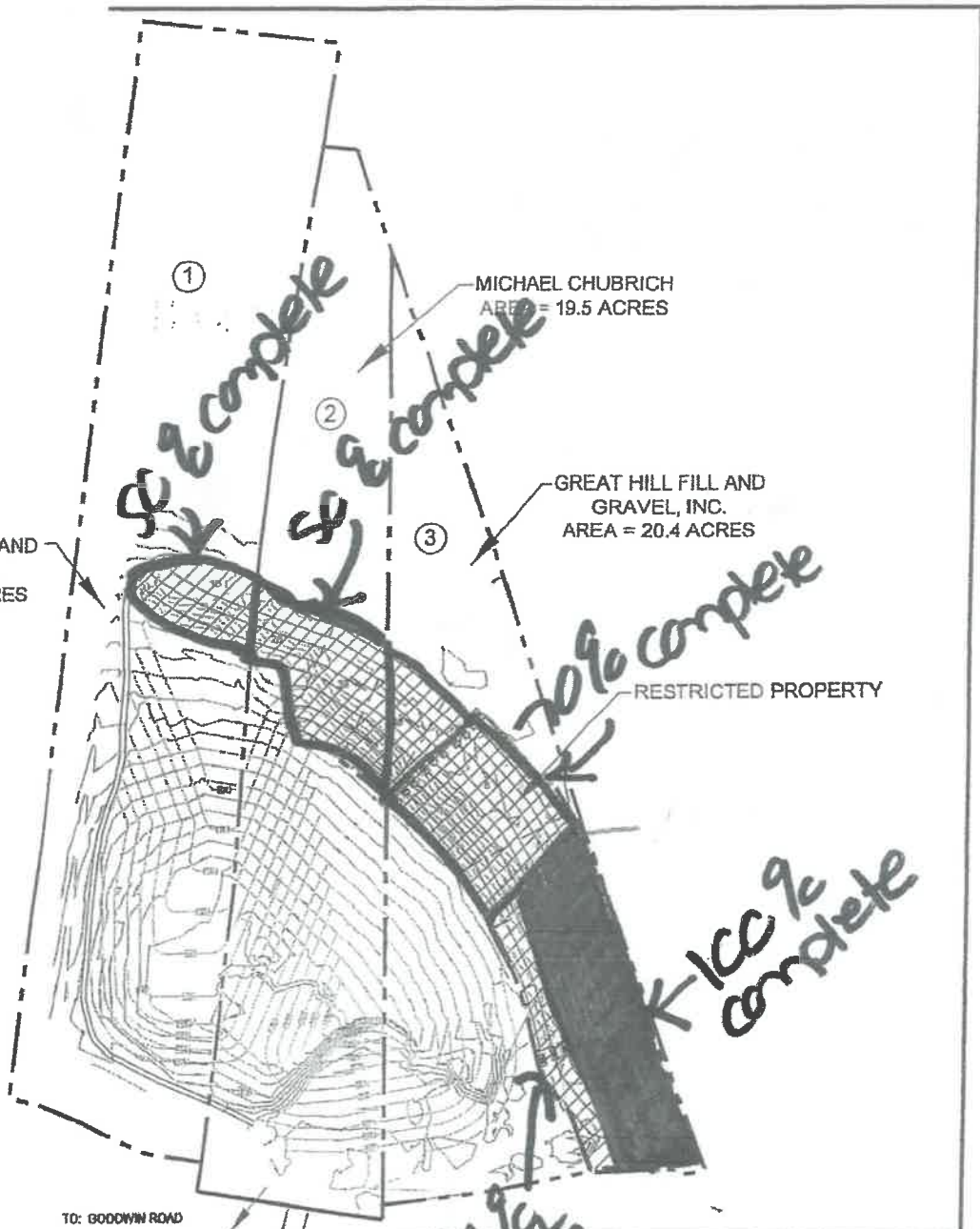
Sand, Silt and Gravel from Gravel Pit

This material will be excavated from the licensed portion of the gravel pit. It is estimated that approximately 950,000 cu. yds. of material remains in the licensed portion of the gravel pit.

WASTE CHARACTERIZATION

Reclaimed demo debris material is non-hazardous. When present, the mastic coating comprises a thin layer on the brick or concrete components of the reclaimed demo debris, and therefore the coating comprises a very small percentage of the material by weight or volume. The mastic layer has been analyzed for asbestos with results ranging from non-detect to fifteen percent. This represents less than one percent of the reclaimed demo debris material. A copy of the analytical report is provided in this attachment.

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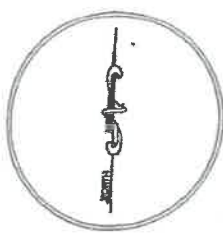
GREAT HILL FILL AND GRAVEL, INC.
AREA = 28.7 ACRES

MICHAEL CHUBRICH
AREA = 19.5 ACRES

GREAT HILL FILL AND GRAVEL, INC.
AREA = 20.4 ACRES

RESTRICTED PROPERTY

TO: GOODWIN ROAD



① PARCEL NUMBER

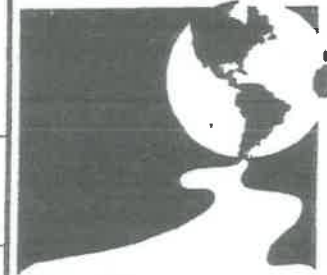
SOURCE: GREAT HILL FILL AND GRAVEL, INC.
FINAL GRADING PLAN, PREPARED FOR WILLIAM A.
RENAUD JR. TRUCKING, BY ST.GERMAIN &
ASSOCIATES, INC., DATED MARCH 22, 2000.

GREAT HILL FILL AND GRAVEL, INC.
RECLAMATION PLAN

PREPARED FOR
WILLIAM A. RENAUD, JR. TRUCKING
119 KNIGHTS POND ROAD
SO. BERWICK, MAINE

JOB# 2423.1	DATE: 08/01/02
SCALE: 1" = 450'	FILE: SITE

ST.GERMAIN & ASSOCIATES, INC.
172 US ROUTE ONE
SCARBOROUGH, MAINE 04074
(207) 885-0003 ENVMGNT@STGERMAIN.COM



**ST. GERMAIN
& ASSOCIATES, INC**
ENVIRONMENTAL MANAGEMENT

4499 -> ST GERMAIN & ASSOC. INC 172 US ROUTE ONE SCARBOROUGH MAINE 04074

C