

**From:** Craig Burgess <cburgess@sebagotechnics.com>  
**Sent:** Monday, January 25, 2021 8:24 AM  
**To:** Mark T. Arienti  
**Cc:** Jennifer Curtis  
**Subject:** RE: Copart Final Site Plan and Quarry Ridge Subdivision Amendment  
**Attachments:** Windham ME AST Visual Inspection Checklist.pdf; Windham ME Spill Response FM-186 Manual 1.15.21.pdf; WG 500gl Information\_.pdf

Hi Mark,

I hope you had a great weekend. Following up on the email sent last Friday with regard to recommended changes to the spill prevention and response program.

A weekly AST inspection requirement has been added to the previously updated spill response manual for Windham, ME (pg13). A spill kit verification has been added to the AST inspection checklist (line 16). Both are attached.

The following statement on overfill prevention has been added to the info letter put together on the 500gl WG tank, also attached.

Each tank is outfitted with a fuel level gauge to prevent overfilling. If an overfill were to occur, the unique design of having the fill port located inside the spill box/secondary containment effectively eliminates any chance of a release to the environment. Copart also utilizes a national network of professionally trained jobbers for fuel deliveries which further reduces the risk of an overfill event.

Please let me know if any additional information is required. Also, please let me know if you would like hard copies of our complete response.

**Craig Burgess, PE** *Senior Project Manager*

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**From:** Craig Burgess <cburgess@sebagotechnics.com>  
**Sent:** Friday, January 22, 2021 12:23 PM  
**To:** Mark T. Arienti <mtarienti@windhammaine.us>  
**Cc:** Jennifer Curtis <jcurtis@windhammaine.us>

**Subject:** RE: Copart Final Site Plan and Quarry Ridge Subdivision Amendment

Hello Mark,

The suggested edits will be made to the spill prevention and response program. I'm still awaiting the revised manual from Copart. Attached is more information on the fuel cube, and revised plans showing the relocated fuel cube. Additionally, we slightly modified the shape of the paved apron to better align with the drive aisle.

Don't hesitate to contact me with any questions.

Have a great weekend,

**Craig Burgess, PE** *Senior Project Manager*

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**From:** Thomas Smith (Property Manager) <[Thomas.Smith3@valfair.com](mailto:Thomas.Smith3@valfair.com)>  
**Sent:** Friday, January 15, 2021 8:52 AM  
**To:** Craig Burgess <[cburgess@sebagotechnics.com](mailto:cburgess@sebagotechnics.com)>  
**Subject:** FW: Copart Final Site Plan and Quarry Ridge Subdivision Amendment

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**From:** "Mark T. Arienti" <[mtarienti@windhammaine.us](mailto:mtarienti@windhammaine.us)>  
**Date:** January 13, 2021 at 11:37:15 AM EST  
**To:** Craig Burgess <[cburgess@sebagotechnics.com](mailto:cburgess@sebagotechnics.com)>, Jennifer Curtis <[jcurtis@windhammaine.us](mailto:jcurtis@windhammaine.us)>  
**Subject:** FW: Copart Final Site Plan and Quarry Ridge Subdivision Amendment

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jenn,

This e-mail is to follow up on the discussion at the Planning Board meeting on 1/11/20 regarding

the proposed fuel cube. The cut sheet sent with the 12/18/20 package from Sebago Technics indicates that the storage tank is a 500-gallon UL-142 double wall steel unit so leaks from the tank itself are of minor concern. However, spills and leaks associated with filling vehicles and filling the tank are a legitimate concern. Please provide details on the vehicle filling mechanism.

The proposed design also includes placement of the tank on a 10'x10' concrete pad, which should help prevent small drips during filling from directly entering and contaminating soil. However, In order to prevent larger spills from directly entering soil and potentially impacting groundwater, the concrete pad should be built into the paved pad that will be used for holding damaged vehicles that have a higher likelihood of leaking. A few other items that should be added to the spill prevention and response program:

- Increase inspection frequency of the tank area from monthly to weekly
- Specify that a spill kit with absorbent booms/pads will be placed next to fuel cube
- Clarify the method from preventing overfills of the tank.

Thanks,

Mark

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**From:** Mark T. Arienti

**Sent:** Monday, January 4, 2021 8:10 AM

**To:** Jennifer Curtis ([jcurtis@windhammaine.us](mailto:jcurtis@windhammaine.us)) <[jcurtis@windhammaine.us](mailto:jcurtis@windhammaine.us)>

**Cc:** 'Craig Burgess' <[cburgess@sebagotechnics.com](mailto:cburgess@sebagotechnics.com)>

**Subject:** Copart Final Site Plan and Quarry Ridge Subdivision Amendment

Jenn,

I've reviewed the response to 11/5/20 comments and associated plan set prepared by Sebago Technics dated 12/18/20. I am satisfied with their response to most of my comments, but I do have further comment on #20 in their response, which is repeated below with my additional comment in **red**.

*Town Engineer Comment: Regarding the proposed petroleum spill response procedure, please provide a material safety data sheet for FM-186.2 as well as documentation that Maine DEP is OK with its use on petroleum spills. I think it would be preferable to remove and properly dispose of the spilled materials when detected rather than chemically treat them. Furthermore, construction of at least part of the vehicle storage area with a paved surface (for damaged vehicles presenting more of a leak risk) would provide for easier clean up of leaks and drips than for a gravel/crushed stone pad. The proposed facility is located within 2 Watersheds of Lakes Most at Risk from Development as well as over an aquifer classified by the Maine Geological Survey as a Significant Sand and Gravel Aquifer. A paved pad should be considered for the surface of at least some of the vehicle storage area.*

**Sebago Response:** Copart is agreeable to construction of a 200 foot x 200 foot paved pad on the south side of the building. Please refer to revised Site Plans. Five (5) copies of Copart's Drip Prevention and BMP's for Ground/Storm Water Protection were sent to the

**Town as Supplemental Information on October 26, 2020. Reference is made to Attachment 1. Before a vehicle is placed in short term storage, it is catalogued and photographed for eventual listing on Copart's auction platform. During that process, the vehicle is also inspected for any drips or leaks. Once the vehicle is unloaded into its "parking spot", it is not moved and is never driven, until it is sold and loaded onto a loader for removal from the site and delivery. Details are in the attached drip prevention Best Management Practices PDF.**

**Please also see the attached SPCC Plan, Attachment 6, reference is made to the Spill Response Plan, Page 2 regarding waste disposal for major and minor spills. A material safety data sheet for FM-186.2 and FM-186.2W are included as Attachment 7. We have sent the material safety data sheets to MDEP and they consider the material used for oil spills non-hazardous. The material safety data sheets will be updated per latest federal standards.**

**Town Engineer Response: Providing some paved area for damaged vehicles is appropriate to facilitate inspection and clean up of spills and drips; however, a 200'x200' area is less than 5% of the total vehicle storage yard which is a very limited area. Copart should consider doubling the size of the paved area to something closer to 10% of the total area.  
or draining and collecting all fluids from damaged vehicles before placing them in storage.**

Please let me know if you have any questions,

Thanks,

Mark

Mark Arienti, P.E., Town Engineer  
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