MW 3/9/15

TOWN OF RYE • OFFICE OF SELECTMEN
10 Central Road
Rye, NH 03870-2522
(603) 964-5523 • Fax (603) 964-1516

February 24, 2015

Michael J. Wimsatt, P.G., Director
Waste Management Division
NH Department of Environmental Resources
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

Re: Former Rand Lumber Company Property
511 Wallis Road, Rye, N.H.

Dear Director Wimsatt:

The former Rand Lumber Company property in Rye consists of 92 acres owned by Wallis Road Properties, LLC. The Town of Rye Conservation Commission has an agreement to purchase 73 acres of the property. The remaining 18 acres are being developed as a retirement community of 20 single family detached dwellings.

At a public hearing on the conservation commission acquisition a citizen asked if there had been an environmental assessment of the property. A representative of Wallis Road Properties, LLC said that there had been one. A selectman asked if the town could have a copy. A Phase I Environmental Site Assessment Report prepared by GZA GeoEnvironmental, Inc. and dated June 2013 was provided to the board of selectmen. A copy of the report without the appendices is enclosed.

As part of its Phase I work GZA reviewed findings from a 2001 Environmental Transaction Screen done by Exeter Environmental Associates (EEA).

After reviewing the Phase I GZA Report the selectmen became concerned about some findings relative to the land being developed for the retirement community, including the following:

1. The GZA Report indicates that in 2001 EEA observed 37 drums of waste liquids improperly stored on the subject property. Most were believed to contain waste motor oil and several were

leaking with associated soil staining. The GZA Report indicates that Mr. Rand told them the drums were disposed of off-site but no soil was excavated. GZA was not able to observe the original ground where the drums had been located because it was covered with imported blast rock and fill materials. GZA's recommendation was:

> "No further assessment is warranted at this time; however should isolated areas of petroleum impacted soils be encountered during redevelopment of the Site, that soil will require proper management and disposal. GZA recommends that a soil management plan be developed that describes proper handling, management and disposal of petroleum-impacted soil."[1]

2. GZA observed oil stained surfaces on the floors of the saw mill and planer mill buildings. Some of the floors were earthen. Both buildings have been demolished since the GZA observations. GZA's recommendation was.

> "No further assessment is warranted at this time; however should petroleum impacted building materials and/or areas of petroleum-impacted soil be encountered during redevelopment of the Site, that material will require proper management and disposal. GZA recommends that a soil management plan be developed that describes proper handling, management and disposal of petroleum impacted soil."[2]

The area where the 37 drums were stored and the locations of the saw mill and planer mill were on the land being developed as a retirement community. Construction of infrastructure and several dwellings is well underway. A soils management plan was not prepared.

In December 2014 town counsel and I met with representatives of Wallis Road Properties, LLC and a representative of GZA to discuss the town's concerns. At the time the town had additional concerns as well as the above. As a result of the meeting GZA agreed to revisit the site and to prepare a written response to the town's concerns. The response, dated December 18, 2014 is enclosed.[3]

The State of New Hampshire through DES has preempted the regulation of contaminated sites. Env-Or 604.06 (c) requires persons who become aware of oil discharges of less than 25 gallons of oil to land to notify DES immediately after obtaining knowledge of the discharge, unless the discharge is cleaned up immediately.

The GZA Phase I Report indicates that there were oil discharges to the Rand Lumber Company land in the past that were not cleaned up immediately. Hence, in accordance with Env-Or 604.06 (c) the Town of Rye is reporting that to DES.

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[1] Phase 1 Report, p. 21.
[2] Phase 1 Report, p. 21.
[3] The December 18, 2014 GZA response was provided to the town electronically. Town officials did not open it until January 3, 2015 due to a dispute over its confidentiality and the confidentiality of the Phase I Report.

Also enclosed is a copy of a GZA letter of June 24, 2013 which supplements the Phase I Report and which addresses a ground water seep referenced in the Phase I Report.

Please do not hesitate to contact me if you have any questions concerning this letter.

Very truly yours,

Michael J. Magnant
Rye Town Administrator

Enclosures: As noted.

cc: John O'Neill, Changing Places, LLC
Ed Hayes, Wallis Road Properties, LLC
Amy T. Doherty, GZA GeoEnvironmental, Inc.
Timothy Phoenix, Esq.
Michael Donovan, Esq., Town Counsel
Board of Selectmen

GZA
GeoEnvironmental, Inc.

Engineers and Scientists

VIA EMAIL

December 18, 2014
File No. 04.0029797.01

Mr. Michael Magnant
Town Administrator
Town of Rye, New Hampshire
10 Central Road
Rye, New Hampshire 03870

Re: Supporting Information / Meeting Follow-Up
Former Rand Lumber
511 Wallis Road (Site)
Rye, New Hampshire

5 Commerce Park North
Suite 201
Bedford, New Hampshire
03110-6984
603-623-3600
FAX 603-624-9463
www.gza.com

Dear Mr. Magnant:

On behalf of Wallis Road Properties LLC (WRP), GZA GeoEnvironmental, Inc. (GZA) is pleased to provide the Town of Rye, New Hampshire (Town) with this update to our findings with respect to environmental issues at the above-referenced Site. This information was requested at a December 4, 2014 meeting held at the Town Offices.

GZA completed a Phase I Environmental Site Assessment (ESA) Report (herein referred to as "Report") for the Site dated June 21, 2013. Based on the review of available information and observations made at the Site, GZA at that time concluded that the following Recognized Environmental Conditions were identified in connection with the Site:

- Historically, three underground storage tanks (USTs) were present at the Site. GZA concluded that proper closure documentation existed for two of the three former USTs;
- A former drum storage area existed within the gravel reclamation area. Historically, leaking drums with associated soil staining had been observed in this area. GZA understood from Mr. Rand that the drums were removed and disposed of off site. Mr. Rand further indicated to GZA that limited residual surficial soil staining remained after the drums were removed. This area was subsequently filled with blast rock and imported fill; and
- GZA observed oily sawdust/wood chips within the interior of the Saw Mill and Planer Mill buildings that according to Mr. Rand consisted of kerosene oil which was applied as lubrication to steel chains and other equipment. GZA also observed limited oil-stained surfaces within a small maintenance/machine area in the Planer Mill.

GZA concluded in each of the three areas of concern identified above that neither further assessment nor further remedial action was warranted; however, GZA also indicated that should petroleum-impacted building materials and/or areas of petroleum-impacted soil be encountered during redevelopment of the Site, that material might, depending upon quantity and concentration, require proper handling and disposal. Accordingly, GZA recommended that a Soil Management Plan outlining best management practices be developed that describes proper handling, management and disposal of the identified petroleum-impacted soil only if conditions were encountered that warranted handling of impacted materials.

Accordingly, based on discussions during our meeting with you, and as a conservative measure, WRP has retained GZA as their environmental consultant and Enpro Services, Inc. (Enpro) of Salisbury, Massachusetts as their on-call remedial contractor. Note that after our meeting with you on December 4, 2014, Amy Doherty inspected the under-construction site in the areas of previous concern, and found no observable evidence of contamination.

Should P.K. Brown Construction Services LLC (P.K. Brown Construction), WRP's experienced site-work contractor, or any other person associated with site development, encounter evidence of potential contamination, work will stop and WRP and GZA will be notified. GZA will work with P.K. Brown Construction and WRP to assess the conditions and develop a Site-specific Soil Management Plan. The New Hampshire Department of Environmental Services will be notified if an exceedance of applicable Soil Remediation Standards or Ambient Groundwater Quality standards included in Env-Or 600 *Contaminated Site Management* is discovered.

The Town has recently raised four specific "items of concern" based on the Recognized Environmental Conditions identified in GZA's Report. GZA provides the following information for clarification purposes so that the Town has a better understanding of GZA's opinion's regarding our conclusions in our Phase I ESA Report. This letter is subject to modification if subsequent information is developed by GZA or any other party and is subject to the attached limitations.

Concern No. 1: 500-gallon / 550-gallon UST

GZA noted that there were discrepancies regarding the reported size of the fuel UST located off the southwestern corner of the Planer Mill and whether it was a 500-gallon or 550-gallon capacity. No records were identified for closure of this UST system regardless of size; however, GZA notes the following:

- This UST was reportedly installed in the 1950s when steam engines were introduced at the mill. UST regulations requiring proper closure documentation were not in place during this time period and lack of documentation is not uncommon for USTs of this era;

- In the 1970s and 1980s we understand that an aboveground storage tank (AST) mounted on a skid steer was utilized. The UST may have been removed at that time;
- During the initial Site reconnaissance in April 2013 as well as a follow-up Site visit conducted on December 11, 2014, no evidence of the presence of a UST (i.e., vent or fill pipes, etc.) was observed by GZA; and
- Between GZA's April 2013 and December 2014 Site visits, significant earthwork/excavation had occurred in this area of the Site in preparation for the construction of a stormwater retention pond, utilities, and residential foundations. The General Contractor (P.K. Brown Construction) indicated to GZA that they have not encountered any evidence of a UST or soil staining indicative of a historical or on-going release. Neither was evidence observed during Amy Doherty's site inspection on December 4, 2014.

GZA recommended in the Report that "*should an abandoned UST be encountered during redevelopment of the Site, Changing Places will be required to register the UST and close the UST by removal in accordance with the applicable State standards.*" Should a UST be encountered during redevelopment at the Site, WRP will engage GZA and Enpro to properly remove the UST system in accordance with applicable regulations.

Concern No. 2 - Former Drum Storage Area

Mr. Rand indicated that following the drum removal, only limited residual surficial soil staining remained. Subsequent to the drum removal the area was filled with the blast rock and fill. The blast rock/fill material has since been crushed and moved to different locations at the Site for re-use. The general vicinity of the drum storage area has been restored to original grade as part of blast rock management, road construction, and installation of utilities.

The General Contractor (P.K. Brown Construction) indicated to GZA that they have not encountered any evidence of a soil staining indicative of a historical release of petroleum at the Site. During the follow-up Site visit conducted on December 4 and 11, 2014, no evidence of stained surficial soil was observed in this general area by GZA.

Concern No. 3 – Petroleum-Impacted Building Materials and Soils Under the Former Saw Mill and Planer Mill

As indicated to you by WRP and P.K. Brown Construction during our December 4, 2014 meeting, the buildings were recently demolished including removal and off-site disposal of building materials, including the footings and foundations. This area has since been significantly re-worked for Site redevelopment. During the excavation and removal of the footings and foundations, installation of the stormwater retention pond, utilities, and new residential foundations, P.K. Brown Construction reports that it has not encountered any evidence of petroleum contamination of Site soils.

During the follow-up Site visit conducted on December 4 and 11, 2014, no evidence of stained surficial soil was observed in this general area by GZA.

Concern No. 4 – Oil Staining on the Ground Surface Around Oil Shed

As indicated in the Report, "*GZA returned to the Site on April 16, 2013 following their* [contents of the oil shed] *removal. The oil shed was observed to be empty and had been moved to expose the ground surface beneath the oil shed. GZA observed minor surficial staining around the foot print of the shed; however, this staining appeared to be limited to the ground surface.*" In GZA's opinion, the minor staining observed on the ground surface was considered to be a de minimis condition and therefore no recommendation for further action was required. In accordance with the ASTM Standard Practice for Phase I Environmental Site Assessments, E 1527-13 (ASTM 1527-13), de minimis conditions include "*conditions that generally would not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.*"

During the follow-up Site visit conducted on December 4 and 11, 2014, no evidence of stained surficial soil was observed in this general area by GZA.

We trust that the information discussed in our meeting and summarized in this letter satisfies the Town's present needs. If you have any further questions or require further clarifications, please contact Ms. Amy Doherty at (603) 232-8763 or amy.doherty@gza.com.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Amy T. Doherty
Amy T. Doherty
Senior Project Manager

John C. Murphy
John C. Murphy
Senior Principal

Jeffrey D. Rowell
Jeffrey D. Rowell
Consultant/Reviewer

ATD/JCM/JDR:mm/tmd
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Attachment: Limitations

LIMITATIONS

PHASE I ENVIRONMENTAL SITE ASSESSMENT
LIMITATIONS

Use of Report

1. GZA GeoEnvironmental, Inc. (GZA) prepared this report on behalf of, and for the exclusive use of Wallis Road Properties LLC for the stated purpose(s) and location(s) identified in the Report. However, GZA acknowledges and agrees that the Report may be conveyed to the buyer associated with the proximate development of the subject location(s) to the extent set forth in our signed proposal dated December 15, 2014. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

Standard of Care

2. Our findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Report, and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work. Conditions other than described in this report may be found at the subject location(s).

3. Our services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made.

Uncertainty not Eliminated

4. No environmental site assessment can eliminate the uncertainty of the possible presence of Recognized Environmental Conditions (RECs). This report was prepared to help reduce, not to eliminate, such uncertainties. Consistent with American Society for Testing and Materials (ASTM) Guidance (ASTM 1527-13), our opinions were developed in light of the constraints imposed by time and budget.

Limits to Observations

5. As indicated in the Report, we made observations for evidence of RECs at the Site and for conditions at adjoining properties that could result in RECs at the Site. Observations were made of the Site and of structures on the Site as indicated within the report. Where access to portions of the Site or to structures on the Site was unavailable or limited, GZA renders no opinion as to the presence of hazardous substances, hazardous wastes, or petroleum products, or to the presence of indirect evidence relating to these materials, in that portion of the Site or structure. In addition, GZA renders no opinion as to the presence of hazardous

substances, hazardous wastes, or petroleum products, or to the presence of indirect evidence relating to these materials, where direct observation of the interior walls, floor, or ceiling of a structure on the Site was obstructed by objects or coverings on or over these surfaces. Our opinions are necessarily based on these limited observations. Additionally, some activities or events of potential interest, at the Site or on adjoining properties, may have been transient and not observable at the time of our visit.

Reliance on Information from Others

6. We relied upon information made available by Federal, state and local authorities, the Key Site Manager, and others. We did not attempt to independently verify the accuracy or completeness of that information. Inconsistencies in this information which we have noted, if any, are discussed in the Report.

Additional Information

7. Additional opinions or information regarding RECs may be developed by the lender, seller, buyer, or other parties. Such additional opinions or information may not fully support the opinions provided in this report. In the event such additional opinions or information is developed, we recommend that we be retained, in a timely manner, to review this material. This will provide us the opportunity to evaluate and modify, as necessary, the opinions provided in the Report

Compliance with Regulations and Codes

8. Our services were performed to render an opinion on the presence of RECs. Unless specifically addressed within the Report, we rendered no opinion on the compliance of Site conditions or activities with local, state, or Federal codes or regulations.

Shelf Life

9. The opinions expressed in this Report are based on conditions observed during the course of our work on this Site; these conditions may change over time. ASTM Guidance (see ASTM 1527-13) states that observations and opinions are only valid for 180 days. After 180 days, an update of portions of the Report may be necessary.

GZA
GeoEnvironmental, Inc.

Engineers and Scientists

VIA EMAIL

June 24, 2013
File No. 04.0029797.00

Mr. John O'Neill
Changing Places, LLC
42 J Dover Point Road
Dover, New Hampshire 03820

Re: Sampling Data Results
Former Rand Lumber
511 Wallis Road
Rye, New Hampshire

380 Harvey Road
Manchester
New Hampshire
03103-3347
603-623-3600
FAX 603-624-9463
www.gza.com

Dear Mr. O'Neill:

GZA GeoEnvironmental, Inc. (GZA) is pleased to provide this letter report to Changing Places, LLC, (Changing Places) that summarize the data results of a groundwater seep that was sampled at the above referenced property at your request. This letter report presents GZA's field observations, results, and opinions. The opinions included in this letter report are subject to modification based on additional information obtained by GZA or provided to GZA by other parties and the attached Limitations.

GZA conducted a site reconnaissance on April 3, 2013 as part of a Phase I Environmental Site Assessment (ESA) submitted to you under separate cover with the objective to make surficial observations for evidence of Recognized Environmental Conditions that could result in the presence of petroleum products or hazardous materials in the environment. At that time, GZA observed a groundwater seep flowing into a forested wetland area just northeast of the Sawdust House (refer to in the attached Figure). The surface water within the area proximate to the seep contained a rust-colored precipitate. The surface water and precipitate did not display petroleum odors nor a visible sheen, and was concluded to be a natural occurrence.

Particularly in New Hampshire's surface waters, it is not uncommon to find iron precipitate. Iron is a common element in New Hampshire soils. Consequently, iron-rich soil or bedrock often contain iron bacteria which fulfill their energy requirements by oxidizing ferrous iron into ferric iron when exposed to oxygen and water. When ferrous iron is converted to ferric iron, it becomes insoluble and precipitates out of the water as a rust-colored deposit. This oxidation process can also occur simply by exposing iron-rich groundwater to the atmosphere. The resulting rust-colored precipitate in the water is often considered to be an aesthetic water quality issue.

To be conservative, GZA collected a discrete sample of the water flowing directly from the groundwater seep on April 4, 2013 and submitted the sample to ESS Laboratories, Inc., (ESS) of Cranston, Rhode Island for analyses including volatile organic compounds (VOCs) by United States Environmental Protection Agency (EPA) Method 8260 and semi-VOCs by EPA

method 8270C to evaluate for the presence of petroleum constituents given the historical use of kerosene oil as a lubricant in the former Saw Mill to the south. Refer to the attached laboratory data package and copy of the results.

No petroleum constituents were detected above laboratory reporting limits. Only one compound was detected: bis(2-ethylhexyl)phthalate (DEHP) at a concentration of 2 micrograms per liter (µg/L), which was below the New Hampshire Ambient Groundwater Quality Standard for DEHP included in Env-Or 600 Contaminated Site Management of 6 µg/L. The detected concentration was also below the Water Quality Criteria For Toxic Substances included in Env-Wq 1700 Surface Water Quality Regulations for the freshwater acute and chronic concentrations for aquatic life of 940 µg/L and 3 µg/L, respectively for DEHP. The low concentration of DEHP does not trigger a reporting condition to the New Hampshire Department of Environmental Services.

DEHP is a plasticiser which has been used for decades in a wide range of soft-PVC products such as building materials, medical equipment, garden hoses, shower curtains, plastic gloves, etc. Based on the information reviewed as part of the Phase I ESA of the Site, there was no reported use of DEHP and no readily apparent source of DEHP contamination at the Site, and the low concentration detected may be an anomaly.

GZA recommends that during demolition and Site redevelopment, review of the general area, as it is exposed for construction, be completed to assess for any undocumented or unforeseen conditions. It is our understanding that future residential homes planned as part of the redevelopment will be serviced by municipal water and that Site groundwater will not be used as a source of drinking water.

We trust that this report satisfies your present needs. If you have any questions, please contact Ms. Amy Doherty at (603) 232-8763.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Amy T. Doherty
Amy T. Doherty
Senior Project Manager

John C. Murphy
John C. Murphy
Principal
Environmental Professional

Jeffrey D. Rowell
Jeffrey D. Rowell
Consultant/Reviewer

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Attachments: Limitations
Figure – Site Sketch
ESS Laboratory Data Package

LIMITATIONS

PHASE I ENVIRONMENTAL SITE ASSESSMENT
LIMITATIONS

Use of Report

1. GZA GeoEnvironmental, Inc. (GZA) prepared this report on behalf of, and for the exclusive use of Changing Places, LLC for the stated purpose(s) and location(s) identified in the Report. However, GZA acknowledges and agrees that the Report may be conveyed to the buyer associated with the proximate purchase of the subject location(s) to the extent set forth in our signed Change Order #1 dated March 26, 2013. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

Standard of Care

2. Our findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Report, and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work. Conditions other than described in this report may be found at the subject location(s).

3. Our services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made.

Uncertainty not Eliminated

4. No environmental site assessment can eliminate the uncertainty of the possible presence of Recognized Environmental Conditions (RECs). This report was prepared to help reduce, not to eliminate, such uncertainties. Consistent with American Society for Testing and Materials (ASTM) Guidance (ASTM 1527-05), our opinions were developed in light of the constraints imposed by time and budget.

Limits to Observations

5. As indicated in the Report, we made observations for evidence of RECs at the Site and for conditions at adjoining properties that could result in RECs at the Site. Observations were made of the Site and of structures on the Site as indicated within the report. Where access to portions of the Site or to structures on the Site was unavailable or limited, GZA renders no opinion as to the presence of hazardous substances, hazardous wastes, or petroleum products, or to the presence of indirect evidence relating to these materials, in that portion of the Site or structure. In addition, GZA renders no opinion as to the presence of hazardous substances, hazardous wastes, or petroleum products, or to the presence of indirect evidence relating to these materials, where direct

observation of the interior walls, floor, or ceiling of a structure on the Site was obstructed by objects or coverings on or over these surfaces. Our opinions are necessarily based on these limited observations. Additionally, some activities or events of potential interest, at the Site or on adjoining properties, may have been transient and not observable at the time of our visit.

Reliance on Information from Others

6. We relied upon information made available by Federal, state and local authorities, the Key Site Manager, and others. We did not attempt to independently verify the accuracy or completeness of that information. Inconsistencies in this information which we have noted, if any, are discussed in the Report.

Additional Information

7. Additional opinions or information regarding RECs may be developed by the lender, seller, buyer, or other parties. Such additional opinions or information may not fully support the opinions provided in this report. In the event such additional opinions or information is developed, we recommend that we be retained, in a timely manner, to review this material. This will provide us the opportunity to evaluate and modify, as necessary, the opinions provided in the Report

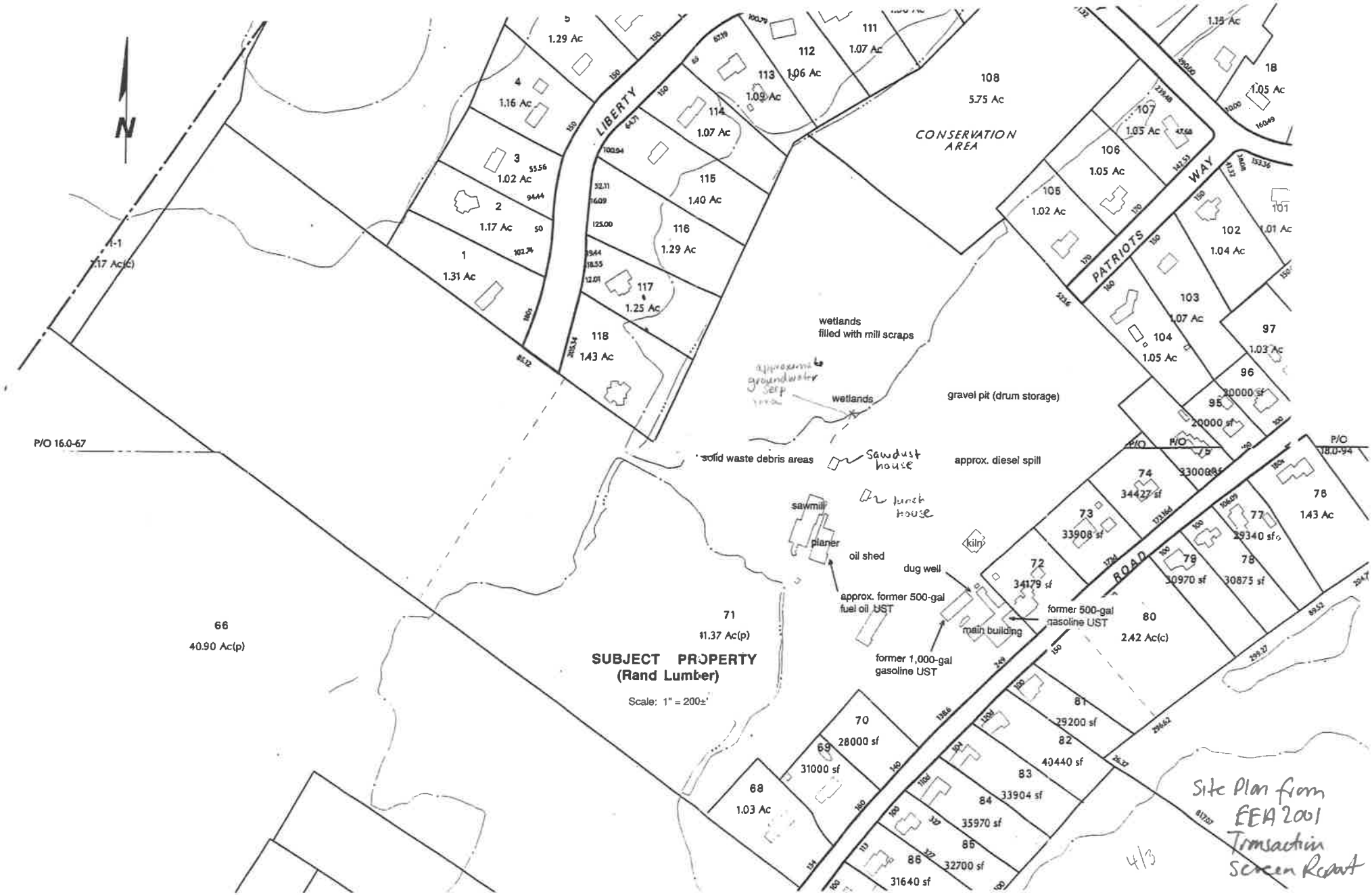
Compliance with Regulations and Codes

8. Our services were performed to render an opinion on the presence of RECs. Unless specifically addressed within the Report, we rendered no opinion on the compliance of Site conditions or activities with local, state, or Federal codes or regulations.

Shelf Life

9. The opinions expressed in this Report are based on conditions observed during the course of our work on this Site; these conditions may change over time. ASTM Guidance (see ASTM 1527-05) states that observations and opinions are only valid for 180 days. After 180 days, an update of portions of the Report may be necessary.

FIGURE


N
LIBERTY
WAY
PATRIOTS
ROAD
CONSERVATION AREA
SUBJECT PROPERTY
(Rand Lumber)
Scale: 1" = 200±'
wetlands
filled with mill scraps
wetlands
gravel pit (drum storage)
solid waste debris areas
Sawdust house
approx. diesel spill
lunch house
sawmill
planer
oil shed
dug well
kiln
approx. former 500-gal fuel oil UST
former 1,000-gal gasoline UST
former 500-gal gasoline UST
main building
P/O 16.0-67
P/O 18.0-94
66
40.90 Ac(p)
71
41.37 Ac(p)
80
2.42 Ac(c)
108
5.75 Ac
1 1.31 Ac
2 1.17 Ac
3 1.02 Ac
4 1.16 Ac
5 1.29 Ac
111 1.07 Ac
112 1.06 Ac
113 1.09 Ac
114 1.07 Ac
115 1.40 Ac
116 1.29 Ac
117 1.25 Ac
118 1.43 Ac
101 1.01 Ac
102 1.04 Ac
103 1.07 Ac
104 1.05 Ac
105 1.02 Ac
106 1.05 Ac
107 1.05 Ac
18 1.05 Ac
1.15 Ac
97 1.03 Ac
96 20000 sf
95 20000 sf
74 34427 sf
73 33908 sf
72 34179 sf
78 1.43 Ac
77 29340 sf
79 30970 sf
76 30875 sf
81 29200 sf
82 40440 sf
83 33904 sf
84 35970 sf
85 32700 sf
86 31640 sf
70 28000 sf
69 31000 sf
68 1.03 Ac
Site Plan from EEA 2001 Transaction Screen Report
4/3

ESS LABORATORY DATA PACKAGE

CERTIFICATE OF ANALYSIS

Amy Doherty
GZA GeoEnvironmental, Inc.
380 Harvey Road
Manchester, NH 03103

RE: Rand Lumber (04.0029797)
ESS Laboratory Work Order Number: 1304103

This signed Certificate of Analysis is our approved release of your analytical results. These results are only representative of sample aliquots received at the laboratory. ESS Laboratory expects its clients to follow all regulatory sampling guidelines. Beginning with this page, the entire report has been paginated. This report should not be copied except in full without the approval of the laboratory. Samples will be disposed of thirty days after the final report has been delivered. If you have any questions or concerns, please feel free to call our Customer Service Department.

Laurel Stoddard
Laboratory Director

Analytical Summary
The project as described above has been analyzed in accordance with the ESS Quality Assurance Plan. This plan utilizes the following methodologies: US EPA SW-846, US EPA Methods for Chemical Analysis of Water and Wastes per 40 CFR Part 136, APHA Standard Methods for the Examination of Water and Wastewater, American Society for Testing and Materials (ASTM), and other recognized methodologies. The analyses with these noted observations are in conformance to the Quality Assurance Plan. In chromatographic analysis, manual integration is frequently used instead of automated integration because it produces more accurate results.

The test results present in this report are in compliance with NELAC Standards, A2LA and/or client Quality Assurance Project Plans (QAPP). The laboratory has reviewed the following: Sample Preservations, Hold Times, Initial Calibrations, Continuing Calibratins, Method Blanks, Blank Spikes, Blank Spike Duplicates, Duplicates, Matrix Spikes, Matrix Spike Duplicates, Surrogates and Internal Standards. Any results which were found to be outside of the recommended ranges stated in our SOPs will be noted in the Project Narrative.

PHASE I ENVIRONMENTAL SITE ASSESSMENT
FORMER RAND LUMBER
511 WALLIS ROAD
RYE, NEW HAMPSHIRE

PREPARED FOR:
Changing Places, LLC
Dover, New Hampshire 03820

PREPARED BY:
GZA GeoEnvironmental, Inc.
Manchester, New Hampshire

June 2013
File No. 04.0029797.00

GZA
GeoEnvironmental, Inc.

Engineers and Scientists

June 21, 2013
File No. 04.0029797.00

Mr. John O'Neill
Changing Places, LLC
42 J Dover Point Road
Dover, New Hampshire 03820

Re: Phase I Environmental Site Assessment
Former Rand Lumber
511 Wallis Road
Rye, New Hampshire

Dear Mr. O'Neill:

380 Harvey Road
Manchester
New Hampshire
03103-3347
603-623-3600
FAX 603-624-9463
www.gza.com

GZA GeoEnvironmental, Inc. (GZA) is pleased to submit the attached "Phase I Environmental Site Assessment Report" (Report) to Changing Places, LLC. This Report summarizes the findings of a Phase I Environmental Site Assessment conducted by GZA for an approximate 82.3-acre property referred to as the former Rand Lumber addressed as 511 Wallis Road and located in Rye, New Hampshire.

GZA's assessment of the Site was completed in general accordance with the ASTM Method E1527-05 and GZA's proposal for services. This report is based on our review of available historical and environmental records, visual observations of the subject Site and adjoining properties, and personal interviews with available persons having knowledge of the property. **Section 11.0** of the report, *Findings and Conclusions*, is considered an Executive Summary, and should be reviewed in conjunction with the entire report. Authorization to proceed on this project was granted by Changing Places, LLC in accordance with our Change Order #1 dated March 26, 2013.

We trust that this Report satisfies your present needs. If you have any questions, please contact Ms. Amy Doherty at (603) 232-8763.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Amy T. Doherty
Amy T. Doherty
Senior Project Manager

John C. Murphy
John C. Murphy
Principal,
Environmental Professional

Jeffrey D. Rowell
Jeffrey D. Rowell
Consultant/Reviewer

ATD/JCM/JDR:mm
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Attachment

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1.0 INTRODUCTION

1.1 PROJECT AUTHORIZATION

This report presents the results of a Phase I Environmental Site Assessment (ESA) conducted by GZA GeoEnvironmental, Inc. (GZA) for Changing Places, LLC (Changing Places) of an approximate 82.3-acre property referred to herein as the former Rand Lumber addressed as 511 Wallis Road located in Rye, New Hampshire (Site). GZA's assessment of the Site was completed in general accordance with the American Society for Testing and Materials (ASTM) Method E1527-05 and GZA's proposal for services. Authorization to proceed on this project was granted by Changing Places in accordance with our Change Order #1 dated March 26, 2013. The Site visit portion of this Phase I ESA was conducted on April 3 and 16, 2013.

1.2 PROJECT OBJECTIVES

The objectives of this Phase I ESA were:

- To render an opinion as to whether surficial or historical evidence indicates the presence of recognized environmental conditions[1] which could result in the presence of hazardous substances or petroleum products in the environment, as defined in the ASTM Standard Practice E 1527-05 for Phase I ESAs; and
- To permit the User of this ESA, in this case the prospective purchaser, to satisfy one of the requirements to qualify for certain Landowner Liability Protections under the Comprehensive Environmental Response, Compensation, and Liability Act.

1.3 SCOPE OF SERVICES

As indicated above, GZA's assessment of the Site was completed in general accordance with the ASTM Method E1527-05. No subsurface explorations or chemical testing of soil or groundwater were conducted, and no assessment for the presence of lead or radon, a Property Conditions Assessment, or business risk assessment was completed. GZA's Scope of Services consisted of the following activities:

- A Site reconnaissance to make surficial observations for evidence of Recognized Environmental Conditions;
- An interview with property owner / operator, Mr. Jim Rand, regarding the current and past site usage;
- Review of the site history through selected ASTM Standard Historical Sources;
- Review of federal and State regulatory agency databases identified by ASTM for the Site and selected radii around the Site;

[1] The term "Recognized Environmental Conditions" was taken from the ASTM Standard Practice for Phase 1 Environmental Site Assessments, and is defined as "*the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally would not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.*"

- Contact with local environmental regulatory agencies to inquire about environmental conditions at the Site and in its vicinity;
- A review of the information provided by ACM as part of "User's Responsibilities" described in ASTM 1527-05;
- A vicinity reconnaissance of properties within ¼ mile of the Site;
- A review of adjoining properties to identify the potential use of hazardous materials; and
- The preparation of this report of our findings.

Omissions from the ASTM E 1527-05 guideline include the following:

- GZA did not perform a title search (searches for environmental cleanup liens) as part of the standard historical sources (Section 8.3.4.4), as this is a User Responsibility as defined in Section 6 of the ASTM E 1527-05 guideline.

This report presents GZA's field observations, results of research, and opinions related to apparent environmental conditions at the Site. This report is subject to modification if subsequent information is developed by GZA or any other party. This report is subject to the limitations presented in **Section 13.0** and **Appendix A**.

While this report provides an overview of potential environmental concerns that meet the criteria of Recognized Environmental Conditions per ASTM Designation: E1527-05, both past and present, the environmental assessment is limited by the availability of information at the time of the assessment. It is possible that unreported accounts of disposal, improper handling, or accidental discharge of waste may have occurred, impairing the environmental status of the property and which could not be identified. The conclusions and recommendations regarding environmental conditions that are presented in this report are based on a scope of work authorized by Changing Places. Note, however, that environmental impacts to the property that were unreported, not directly observable, or arising from an incident about which documentation is not readily available, may not be identified through this scope of work.

2.0 BACKGROUND SITE INFORMATION

The following information was obtained during GZA's site reconnaissance and from interviews with persons knowledgeable about the Site. Additional information on site use and area observations and activity at the Site is contained in **Sections 6.0** and **7.0**.

2.1 SITE LOCATION

The Site is located within the Town of Rye, New Hampshire (Town, in Rockingham County) and is situated on the northern side of Wallis Road with nearby cross streets including Liberty Common to the northeast and Acorn Acres to the south-southwest. Access to the Site is via a driveway off Wallis Road. Refer to the Locus Plan (**Figure 1**) and the Site Plan (**Figure 2**) for the general location and configuration of the Site. The Town/City line separating Rye and the City of Portsmouth forms the northwest Site boundary.

2.2 SITE DESCRIPTION

The Site consists of an irregular shaped 82.3-acre parcel of land consisting of two lots identified on the Town Assessor's Tax Maps 16 and 18 as Lot 66 (40.9 acres) and Lot 71 (41.4 acres). The eastern most portions of the Site are developed with several buildings associated with the former Rand Lumber operation that are in various stages of disrepair including a retail sales office building, a planer mill, saw mill, drying kiln building, "lunch house", "oil shed", and three open (three sided) storage sheds. The following summary includes a description of the construction of each building (refer to the site sketches included in **Appendix B** for the historical building layout):

- The retail sales office building (circa 1905-1910, herein referred to as the Main Building) is an irregular shaped wood-framed, three story barn with a walk out basement, a poured concrete basement floor, wood siding and an asphalt shingle roof. Attached to the barn is a wood-framed and sided rectangular shaped open shed and enclosed former chicken coop. The building is heated via electric baseboard heat;
- The Drying Kiln Building (circa 1986) is a roughly square shaped, single story, wood-framed building on a poured concrete slab foundation with metal siding and a metal roof. The building is heated via electric baseboard heat;
- The Planer Mill (circa 1930s) is a rectangular shaped single story, wood-framed structure with wood siding, a metal roof and a walkout basement with brick foundation walls and a poured concrete floor. The building has historically been heated by forced hot air fueled by a combination of wood and fuel oil;
- The Saw Mill (circa 1905) is a rectangular shaped single story, wood-framed structure with wood siding, a metal roof and a basement with a combination wood timber, earthen, and poured concrete foundation floor. The building is not heated; however a large steam boiler fueled by oil was utilized through the 1950s to run equipment. The operation of the steam boiler provided a source of heat historically to this building;;
- The Lunch House (circa 1930s) and "Oil Shed" buildings are small rectangular shaped single story, wood-framed structures with wood siding, a metal roof, and have wood timber floors on an earthen foundation. The Oil Shed is used to store various virgin and waste petroleum products. The Lunch House building is heated via electric baseboard heat and the Oil Shed building is not heated; and
- The remaining open-sided storage sheds, including the sawdust house were generally rectangular shaped single story, wood-framed structures with wood siding, had metal roofs, and earthen floors. None of these buildings were heated.

The immediate vicinity of the lumber yard (northwest portion of the Site near the terminus of Patriots Way) includes an area that had recently been mined for sand and gravel (historically a lumber lay-down area), and is largely bermed on the northern, eastern, and southern sides for Site storm water and erosion control purposes. Within the past year the Site owner has filled in a portion of this same area with imported blast rock comingled with various demolition debris.

A gravel road traverses the undeveloped western half of the Site, which includes rolling topography with areas of both upland and wetlands. Extensive areas of wooded wetlands are located centrally within the Site. Refer to **Appendix C** for photographs of the Site, obtained during GZA's reconnaissance conducted on April 3 and 16, 2013.

2.3 CURRENT SITE USE

At the time of GZA's reconnaissance, Rand Lumber had ceased operation and was in the process of liquidating its assets including all salvageable equipment and materials. The lumber yard was closed to business on December 7, 2012.

2.4 ADJOINING PROPERTIES USE

The Site is adjoined on all sides by a mix of residential properties, conservation land, and undeveloped land.

2.5 AREA USE

In the immediate and greater area surrounding the Site (approximate ¼-mile and ½-mile radius, respectively), GZA observed a mix of rural undeveloped land and residential properties.

2.6 SITE UTILITIES

Utilities for the Site building include the following:

- Potable water is supplied only to the Main building and the Drying Kiln building by the municipal water supply;
- The Main Building is serviced by an on-site subsurface disposal system consisting of a septic tank and leachfield. GZA understands that the associated tank is situated beneath a portion of the Main building and the leach field is situated in the court yard area between the main building and the open sided storage shed (refer to **Figure 2** and the figures included in **Appendix B**);
- The Main Building, Planer Mill, Saw Mill, Drying Kiln Building, and "lunch house" all have electricity provided by an overhead electric service that traverses the southeastern portion of the Site; and
- Interior heat for the Main Building, Drying Kiln Building, and "lunch house" is provided by electric heat and heat for the Planer Mill was formerly provided by a combination wood/oil-fired furnace.

3.0 ENVIRONMENTAL SETTING

The following subsections provide information regarding the general physiographic and hydrologic conditions in the area of the Site.

3.1 REGIONAL PHYSIOGRAPHY

Review of the relevant United States Geological Survey maps (Portsmouth, NH Quad. dated 1993) indicates the Site is located in a low-lying area with little topographic relief. The Site is generally topographically flat to gently sloping downwards (approximate elevation between 40 and 50 feet above sea level) to the north and northeast towards Berrys Brook, which is located about 2,000 feet northeast of the Site and flows in a generally easterly direction. Vicinity topography slopes downwards primarily to the north and northeast toward a series of interconnected wetlands, un-named tributaries, and flat estuaries and marshes associated with Witch Creek. In addition, wetland areas associated with the western branch of Parson's Creek are

situated less than 2,000 feet southeast of the Site. Parson's Creek flows in a general easterly direction to Wallis Marsh and the Atlantic Ocean.

3.2 REGIONAL HYDROLOGY

Based on the general topography of the Site and proximity to Berrys Brook and the western branch of Parson's Creek, groundwater flow beneath the Site is inferred to be in a north to northeasterly direction. A component of groundwater flow within the southernmost portions of the Site may be to the southeast towards the west branch of Parson's Creek. Groundwater flow anomalies may exist beneath the Site and vicinity due to the influence of subsurface soil types, drainage patterns, paved areas, and/or underground utilities. Groundwater levels may also fluctuate seasonally with varying weather conditions. Subsequent references to upgradient and downgradient properties with respect to the Site are based on the estimated north and northeasterly groundwater flow direction.

4.0 HISTORICAL USE INFORMATION

The site history was developed from ASTM Standard Historical Sources and available files at the Town municipal offices, including the Town Clerk, Assessor's, Building Codes, Health, and Planning offices, the Fire Department, and an interview with the current Site owner representative. ASTM indicates that "all obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier." ASTM further indicates that "data failure is not uncommon" when trying to establish the historical use of a property. A historical summary is provided in **Section 4.1**. Specific detail obtained from ASTM historical sources is contained in subsequent sections.

4.1 SITE AND AREA HISTORY SUMMARY

Based on a review of available information, the Site appeared to be first developed in 1905 as a saw mill and lumber yard by Edgar Rand, and was operated by three generations of Rands until December 2012 when the business closed. Through its history, according to Mr. Rand, Rand Lumber primarily manufactured rough cut pine lumber for wholesale purposes. Initial buildings included the Saw Mill and the Main Building. The Planer Mill was constructed in the 1930s. Both the original Saw Mill and Planer Mill burned down in the 1930s, but were both rebuilt soon after.

The Saw and Planer Mill equipment initially operated by steam engines; the original steam boiler fired by wood still exists today. The steam engines were replaced with electric motors in the 1950s and the steam boiler became obsolete. Fuel oil was stored in a 550-gallon UST[2] located off the southeastern corner of the Planer Mill and was used for heating purposes in a combination fuel oil/wood burning furnace in the Planer Miller. No information was available with regards to the installation or possible closure dates for this UST.

During the 1970s and 1980s, hydraulics were added to the saw carriage and de-barker. Some mill equipment was powered by a diesel-fired engine, and diesel fuel was stored in the on-site 275-gallon aboveground storage tank (AST) on a skid steer. The Drying Kiln Building was constructed in 1986 to facilitate drying of the wood products. In 1990 a hydraulic chipper and

[2] GZA notes that some records reference the fuel oil Underground Storage Tank (UST) was a 500-gallon not a 550-gallon UST.

conveyor system was added at which time storage and/or disposal of waste lumber scraps ceased on-site and the wood chips were sold for retail purposes. Two additional gasoline USTs were located on-site including a 1,000-gallon UST with an associated single dispenser situated at the southern end of the open sided storage shed just west of the main building and a 500-gallon UST situated on the eastern side of the Main Building. These USTs were closed by removal in 1993 and 1989, respectively.

Reportedly, no chemical treatment of wood occurred during the history of the mill operations. Kerosene oil was applied as lubrication to steel chains and other equipment to aid in log movement through the production line; however, the buildings had a combination of poured concrete subfloors or wood floors. Sawdust on the floor generally absorbed excess oil. Typical practice was to burn the waste wood byproducts within the wood/oil boiler. Other waste products generated included scrap wood edges/trims, bark, and sawdust. These products were either given away or stockpiled and eventually disposed of on-site. Clean sawdust was offered for agricultural purposes and was typically not disposed of on-site unless a surplus existed. Once the Chipper was installed in 1990, virtually all wood waste went through the chipper and was sold as mulch.

Beginning in 2004, limited gravel mining also occurred within the northeastern most portion of the Site. A permit was issued by the Town for approximately 25,000 cubic yards of gravel reclamation over a 143,500 square foot area, which continued until 2008. Over the past year, according to Mr. Rand, blast rock, boulders, sand and gravel, and limited construction/demolition debris was accepted as fill at the Site from a local development in Rye and was stockpiled within the footprint of the former gravel mining operation.

Rand Lumber had ceased operation and closed on December 7, 2012. At the time of GZA's site visit, Rand Lumber was in the process of liquidating its assets including all salvageable equipment and materials.

4.2 CITY DIRECTORIES REVIEW

GZA requested City Directory information for the Site from Environmental Data Resources, Inc. (EDR) that included information from "Polk's" City Directories from 2000 and 2009 and "Price & Lee's" City Directories from 1963 through 1966 (refer to **Appendix D**). Information provided by EDR indicates that Rand Lumber was listed as being the occupant in all of the directories.

4.3 HISTORIC TOPOGRAPHIC MAP REVIEW

GZA reviewed historical U.S. Geologic Survey (USGS) Topographic maps dated 1916, 1918, 1920, 1944, 1956, 1973, 1981, 1988, and 1993 available through EDR (refer to **Appendix D**) for information regarding development at and in the vicinity of the Site. The 1916 through 1920 topographic maps depicted the Site as largely undeveloped with only one structure located closest to the road. The 1944 and 1956 maps depicted the Main Building and then beginning with the 1973 map, all of the remaining buildings are depicted at the Site as they exist today.

4.4 AERIAL PHOTOGRAPH REVIEW

GZA reviewed aerial photographs dated 1969, 1986, 1990, 1998, 2006, 2008, 2009, and 2011 that were made available by EDR (refer to **Appendix D**). The following provides a summary of the aerial photographs reviewed:

- The 1969 aerial photograph depicted the Site as developed with the active lumber mill with all buildings constructed within the eastern most portion of the Site with the exception of the Drying Kiln Building. The northeastern most portion that was recently mined for sand and gravel was depicted as a laydown area for lumber. The western portion of the Site consisted of undeveloped land. A large area of apparent saw dust / waste wood stockpiling occurred northwest of the Saw Mill building;
- The 1986 aerial photograph depicted similar Site conditions as the 1969 aerial photograph; however, based on the lack of clarity, specific buildings could not be identified;
- The 1990 and 1998 aerial photographs depicted the existing buildings including the Drying Kiln building. The 1998 photograph depicted waste lumber storage in windrows north of the lumber laydown area, northeast of the Saw Mill Building; and
- The 2006, 2008, 2009, and 2011 aerial photographs depicted the Site and vicinity as currently configured, although no active lumber storage was occurring within the northeastern portion of the Site. This area appears to have been mined for sand and gravel by this time; however, no fill had been imported to this area as of 2011.

4.5 HISTORIC ATLAS REVIEW

GZA requested Sanborn Fire Insurance Maps (Sanborn) from EDR and notes that EDR indicated that no maps were available for this address (refer to **Appendix D**).

4.6 TITLE SEARCH AND HISTORY OF OWNERSHIP

Completion of a title search was not included in the scope of this assessment, and no title information was provided by Changing Places as part of the User's Responsibilities. General information regarding the history of ownership was obtained through information that was reviewed on the tax cards made available at the Town Assessor's office (refer to **Appendix E** for a copy of the tax card). According to Town records, the owner of record is Rand Lumber Company, Inc. (Rand Lumber). GZA understands from Mr. Rand that the Rand family has owned the land since at least 1905. No further information regarding ownership was readily available.

4.7 CODE ENFORCEMENT/BUILDING DEPARTMENT/FIRE DEPARTMENT RECORDS

GZA visited the municipal offices including the Fire Department. Based on GZA's review, the following key information was identified:

- A February 1938 Insurance Map for the lumber yard depicted the Main Building, Planer Mill, Saw Mill, an employee camp (referred to now as the "Lunch House"), and a shed in addition to several lumber laydown areas. The 1938 plan noted a "gas pump" was located on the southeastern corner of the office building;
- Fire Department records indicated that a 1,000-gallon gasoline UST was installed in approximately 1984 and that an empty 500-gallon UST was also present at the Site;
- A permit was issued for the construction of the Drying Kiln building in 1986;
- A permit was issued by the Town for installation of the chipper and conveyor in 1990 at which time storage of waste lumber scraps ceased on-site;

- In the 1990s, lumber yard equipment present included a board saw and associated blower, an edger, a saw, a planer and associated blower, a trimmer, and a recirculating saw; and
- A permit was issued by the town for gravel excavation/extraction in 2004 for approximately 25,000 cubic yards over a 143,500 square foot area which continued until 2008 when Rand Lumber provided a letter to the Town indicating that gravel reclamation had been terminated at the Site.

Refer to **Appendix C** for copies of the relevant site sketches and files.

4.8 PROPERTY TAX FILES

Files obtained from the Town Assessor's Office were limited to real estate and property valuation information (refer to **Appendix E** for copies). No pertinent information of an environmental nature was available for review.

4.9 OTHER HISTORICAL SOURCES

No non-standard historical sources were reviewed as part of this investigation.

5.0 PREVIOUS SITE INVESTIGATIONS

GZA reviewed files provided by Mr. Rand and/or made available on New Hampshire Department of Environmental Services' (NHDES') online OneStop database including the following key reports and correspondence[3]:

- Letter to NH DES prepared by Rand Lumber and dated February 15, 1990 regarding the closure of a 500 gallon UST;
- *Site Specific Report, 1-1,000 gallon gas tank removal at 511 Wallis Rd., Rye NH*, prepared by Advanced Petroleum Products Co., Inc., and dated October 12, 1993; and
- *Environmental Transaction Screen, Rand Lumber Property 511 Wallis Road, Rye, New Hampshire*, prepared by Exeter Environmental Associates, Inc. (EEA) and dated April 26, 2001.

Correspondence from Rand Lumber to NHDES indicates that two USTs were closed by removal including: (1) a 550-gallon gasoline tank installed in 1961, had been emptied and placed out of service in 1975, and removed in 1989; and (2) a 1,000-gallon gasoline tank installed in 1980 and removed in 1993. The figure included in **Appendix B** depicts the historical locations of the USTs. Documentation including collection of soil samples at the time of removal indicated that no evidence of a release was observed at that time.

A third UST (a 500-gallon fuel oil tank) is referenced and depicted on the figure included in **Appendix B** however installation and removal dates are uncertain.

During the Site visit conducted as part of the 2001 Environmental Transaction Screen, EEA noted the following Recognized Environmental Conditions:

[3] *http://des.nh.gov/onestop/index.htm*. Note that GZA has not included supporting text of from all investigation reports reviewed as part of this ESA as these reports are readily available on NHDES' OneStop database.

- *"...we observed that approximately 37 drums of waste liquids were improperly stored in the gravel pit on the subject property. Most of the drums are believed to contain waste motor oil, and several were observed to be leaking with associated soil staining. Second, additional petroleum products are improperly stored in the "oil shed" which also has soil staining underneath..."*; and
- *"...we have identified two other concerns. (1) The property formerly contained two gasoline underground storage tanks and one partially buried fuel oil tank. No documented releases have been associated with these tanks, according to information provided by Mr. Jim Rand. (2) We have observed four areas of limited solid waste debris that was historically dumped in the wetland area behind the sawmill building..."*

EEA made the following recommendations:

- *"The drums in the gravel pit should be removed and properly disposed of by a qualified firm. The soil staining beneath the drums should also be excavated for proper off-site disposal. The NH Department of Environmental Services should be contacted so that they are aware that this work is being conducted. Confirmatory soil and groundwater samples should be taken to document the effectiveness of the cleanup";*
- *"The "oil shed" should be replaced with a new structure that has a liquid-tight concrete berm as a foundation. The stained soil beneath the structure should be excavated and properly disposed of, and confirmatory soil samples should also be collected. All waste liquids generated in the future should be properly labeled and disposed of in accordance with applicable regulations"*; and
- *"The limited areas of solid waste debris observed in the wetlands should be removed for proper off-site disposal by a qualified firm. This work should be done by hand, as heavy equipment is likely to disturb the wetland area. The term "solid waste debris" is not intended to include the mill scraps that were observed to have been historically dumped in the wetlands on the property".*

According to Mr. Rand, all drummed waste was removed and disposed of off-site and only limited soil staining was observed; however no surficial stained soil was removed from the Site.

6.0 SITE RECONNAISSANCE

The purpose of GZA's site reconnaissance was to make surficial observations for evidence of Recognized Environmental Conditions that could result in the presence of petroleum products or hazardous materials in the environment. GZA representative Ms. Amy Doherty visited the Site on April 3 and 16, 2013. Observations were documented and pertinent features were photographed and are referenced in the text. Photographs are included in **Appendix C**. Refer to **Figure 2** for general site layout and **Appendix B** for Site Plan sketches. A summary is presented below.

6.1 EXTERIOR OBSERVATIONS

The periphery of the Site and those portions of the property not occupied by structures were visually assessed for Recognized Environmental Conditions. The conditions observed are presented below.

6.1.1 Underground Storage Tanks

GZA did not observe evidence of the presence of vent or fill pipes associated with USTs during our site reconnaissance. However, based on information reviewed and provided by Mr. Rand GZA understands that three USTs formerly existed including: (1) a 550-gallon gasoline tank installed in 1961 and removed in 1989; (2) a 1,000-gallon gasoline tank and associated fuel dispenser system installed in 1980 and removed in 1993; and (3) a 500-gallon fuel oil tank (installation and removal dates uncertain). The locations of the three USTs are illustrated on the Site sketch included in **Appendix B**. According to Mr. Rand, all three USTs were removed without evidence of a release of petroleum products. Documentation of the removal of the two gasoline tanks is included in **Appendix C**. No documentation exists for the removal of the fuel oil tank.

6.1.2 Aboveground Storage Tanks

GZA did not observe evidence of the presence of vent or fill pipes associated with exterior or interior ASTs during our site reconnaissance. Diesel is presently stored in a 275-gallon above-ground tank located on a skid steer within the Oil Shed. According to Mr. Rand, following the closure of the fuel oil UST, fuel oil that was used to heat the Planer Mill was temporarily stored in a 275-gallon AST that was formerly located in the basement of the Planer Mill building. This AST was removed from the Site on an unspecified date.

6.1.3 Hazardous Substances or Petroleum Products Use

GZA observed four plastic 55-gallon drums of apparent waste oil situated on the eastern side of the oil shed. No staining of the ground surface was observed around the base of the drums. No other exterior evidence of the use of hazardous substances or petroleum products was observed during our site reconnaissance.

6.1.4 Staining

Surficial petroleum-like staining was observed by GZA in areas around the base of the Oil Shed building and the ground surface proximate to the oil shed.

6.1.5 Electrical Transformers/Equipment

GZA observed two sets of pole-mounted transformers (three per pole) located on the southeastern side of the Planer Mill and the southwestern side of the Dry Kiln Building. No labels were observed on the transformer to indicate whether or not they contained polychlorinated biphenyls (PCBs). GZA did not observe any staining of the ground surface proximate to the transformers.

6.1.6 Drywells and Sumps

No surficial evidence of exterior drywells or sumps was observed during our site reconnaissance.

6.1.7 Pits, Ponds, and Lagoons

No surficial evidence of pits, ponds, or lagoons was observed during our site reconnaissance.

6.1.8 Wells

GZA did not observe evidence of any wells during our site reconnaissance. However, GZA understands that historically, the Main Building was serviced by a shallow dug well located to the north-northwest of that building. The Main Building was connected to the municipal water system in the 1990s. According to Mr. Rand, this well is no longer in service.

6.1.9 Solid Waste

GZA observed solid waste disposal including scrap metal (metal binding straps for wood), a few apparently empty, rusted 55-gallon drums, plastics, wood, fragments of coal tar impregnated wood fiber pipe (commonly referred to as "Orangeburg" or "Bermico"), and other miscellaneous debris on the ground surface in a wet area north of the Saw Mill / Planer Mill buildings during our site reconnaissance. GZA also observed wood waste to have been disposed of in historical windrows northeast of the Saw Mill / Planer Mill buildings.

6.1.10 Process Wastewater

No evidence of process water was observed during our Site reconnaissance.

6.1.11 Septic System

GZA understands that the Main Building is serviced by an on-site domestic septic system (no other building has plumbing for domestic sewerage). According to Mr. Rand, the tank for the septic system is located underneath a portion of the Main Building and the leach field is located northwest of the Main Building.

6.1.12 Stressed Vegetation

No evidence of stressed vegetation was observed during our Site reconnaissance.

6.1.13 Soil/Water Sampling

No subsurface exploration or chemical analysis was included as part of GZA's Phase I ESA Scope of Services.

6.1.14 Oil/Water Separators

No evidence of oil/water separators was observed during our Site reconnaissance.

6.1.15 Surface Water Runoff

Storm water is believed to infiltrate the ground surface at the Site.

6.1.16 Other Observations

GZA observed that the area formerly used for gravel mining operations had been recently filled with stockpiles of blast rock, boulders, sand and gravel, and limited construction/demolition debris, which was accepted as fill at the Site from a local development in Rye.

GZA also observed a groundwater seep flowing into a forested wetland area just northeast of the sawdust house. The surface water within the area proximate to the seep contained an iron

precipitate. The surface water and precipitate did not display any odors or a visible sheen, and was concluded to be a natural occurrence.

6.2 INTERIOR OBSERVATIONS

The interior of the developed portion of the Site was visually assessed for evidence of Recognized Environmental Conditions. The conditions observed are presented below.

6.2.1 Construction

Refer to section 2.2 for a description of the Site buildings and construction.

6.2.2 Heating and Cooling Systems

The only four buildings on-site that were heated included the Main Building, Drying Kiln Building, and the Planer and Saw Mill buildings as follows:

- The Main and Drying Kiln buildings are heated via electric baseboard heat;
- The Planer Mill was historically heated by forced hot air fueled by a combination of wood and fuel oil; and
- The Saw Mill was historically heated by a steam boiler fueled by oil.

6.2.3 Current Site Use

Refer to **Section 2.3** above.

6.2.4 Chemical Use and Storage Areas

At the time of GZA's reconnaissance, Rand Lumber had ceased operation and was in the process of liquidating its assets including all salvageable equipment and materials. Much of the interior spaces were in the process of being emptied/cleaned out. GZA observed both virgin and waste petroleum products stored within the Oil Shed building (refer to Section 6.2.5 below for additional details) and within the basement of the Main Building.

GZA also observed oily sawdust/wood chips within the interior of the Saw Mill and Planer Mill buildings. According to Mr. Rand, kerosene oil was applied as lubrication to steel chains and other equipment to aid in log movement through the production line; however, the buildings had a combination of poured concrete subfloors or wood floors. Sawdust on the floor generally absorbed excess oil. Typical practice was to burn the waste wood byproducts within the wood/oil boiler. One area of oily sawdust/wood chips observed within the Planer Mill was the location of a former air compressor. According to Mr. Rand the oil observed was likely hydraulic oil from the compressor that resided at that location prior to being sold/removed from the building. GZA noted that an earthen floor was observed beneath the oily sawdust/wood chips in this area.

GZA also observed oil stained surfaces within a small maintenance/machine area in the Planer Mill. No floor drains were observed on the concrete floor.

6.2.5 Hazardous Wastes Generated and Waste Storage Areas

GZA observed virgin and waste petroleum products and hazardous materials in various sizes and types of apparent original small containers stored within the oil shed building. The

floor of the Oil Shed was not visible based on the number and types of containers. A portable 250 gallon AST was also observed in the Oil Shed that reportedly contains diesel fuel. Minor petroleum-like staining was observed on the exterior wall at the base of the shed in several locations and on the ground surface suggesting that materials stored within the building have leaked over time.

Following our April 3, 2013 Site visit, Mr. Rand coordinated with and had the contents of the oil shed (and the four exterior 55-gallon drums) over-packed and disposed of off-site. GZA returned to the Site on April 16, 2013 following their removal. The oil shed was observed to be empty and had been moved to expose the ground surface beneath the oil shed. GZA observed minor surficial staining around the foot print of the shed; however, this staining appeared to be limited to the ground surface.

From previous investigations as indicated in Section 5 above, the gravel reclamation area was historically used to store drums of waste liquids. EEA "*observed heavy soil staining in the vicinity of the drums that are stored in the gravel pit. The soil staining appeared to have originated from leakage of waste motor oil from several of the barrels*". EEA further noted that "*oil staining was observed beneath two waste oil drums located in the basement of the sawmill building*" and that Mr. Rand "*described that there was a spill of an unknown quantity of diesel fuel in the main wood storage yard circa 1990, from the saddle tank of a truck. The spill was treated with sawdust at the time of the incident, but no soil was excavated*". EEA did not observe any surficial evidence of this spill during their 2001 Site visit. At the time of GZA's Site reconnaissance, this area had been filled in with stockpiles of blast rock and fill materials imported to the Site. GZA was not able to directly observe the original ground surface that EEA described.

6.2.6 Stains or Corrosion

Refer to Section 6.2.4 and 6.2.5 for details regarding staining observed.

6.2.7 Floor Drains or Sumps

GZA did not observe any floor drains during our Site reconnaissance. One sump was observed within the basement of the Main Building.

6.2.8 Transformers

GZA did not observe evidence of any interior transformers during our site reconnaissance.

6.2.9 Other Interior Observations

No other significant interior observations were made during our site reconnaissance.

7.0 VICINITY RECONNAISSANCE

As part of GZA's site assessment, a reconnaissance of the properties adjoining the Site, as well as the vicinity within a ¼-mile radius of the Site, was conducted from public properties. The results of GZA's vicinity reconnaissance are presented below.

7.1 HAZARDOUS MATERIAL USE AT ADJOINING PROPERTIES

Adjoining properties are identified in **Section 2.4** above. GZA did not observe the use of oil and/or hazardous materials at adjoining properties from our viewing points. The storage and use of oil and/or hazardous materials at other adjoining properties is believed to be limited for the most part to the storage and use of fuel oil for heating purposes and de minimis quantities of fuel products, paints, and cleaning products based on the uses observed.

7.2 HAZARDOUS MATERIAL USE AT VICINITY PROPERTIES

The general area within ¼ mile of the study Site includes a mix of rural undeveloped land and residential properties. Storage and use of oil and/or hazardous materials at vicinity properties are likely limited to fuel oil for heating purposes and de minimis quantities of fuel products, paints, and cleaning products, based on the uses observed. Federal and State-listed hazardous waste properties are discussed in **Section 8.0** below.

8.0 REGULATORY DATABASE REVIEW

The following section is based on public information obtained from various federal, State, and local agencies that maintain environmental regulatory databases. These databases provide information about the regulatory status of a property and reported incidents involving the use, storage, spillage, or transportation of oil or hazardous materials. Information was provided by EDR and the federal, State, and local regulatory information is presented in **Appendix F**. A discussion of the reviewed information is presented in the following sections.

8.1 FEDERAL AGENCY DATABASES

The ASTM standard federal databases searched were provided by EDR and reviewed by GZA. These reports and the search distances used to review these databases are presented below.

FEDERAL DATABASE	RADIUS SEARCHED	PROPERTIES IDENTIFIED WITHIN RADIUS
National Priorities List (NPL)	1 mile	0
NPL De-listed Sites	½ mile	0
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and CERCLIS Archived Sites	½ mile	0
Federal CERCLIS NFRAP Site List	½ mile	0
Resource Conservation and Recovery Act (RCRA) Treatment Storage and Disposal Facilities	½ mile	0
RCRA Corrective Actions Facilities	1 mile	0
RCRA Generators List	Property and adjoining properties	0
Emergency Response Notification	Property only	0
Federal Institutional/Engineering Controls Registries	Property only	0
Tribal Lands	1 mile	0

The search of the federal databases indicates there were no federally-listed facilities within their prescribed search radii.

8.2 STATE AGENCY DATABASE REVIEW

Information from the ASTM standard State databases searched were provided by EDR and reviewed by GZA. The information obtained from these reports and the search distances used to review these databases are presented below.

STATE DATABASE	RADIUS SEARCH DISTANCE	PROPERTIES IDENTIFIED WITHIN RADIUS
State and Tribal Hazardous Waste Site List including Equivalent NPL and CERCLIS	1 mile – NPL 0.5 - CERCLIS	4
State and Tribal Leaking USTs List	½ mile	1
State and Tribal Registered USTs/ASTs List	Property and adjoining properties	1
State and Tribal Landfill or Solid Waste Disposal Site List	½ mile	0
State and Tribal Institutional Control/Engineering Control Registries	Property only	0
State and Tribal Voluntary Cleanup Sites	½ mile	0
State and Tribal Brownfield Sites	½ mile	0

The search of the State databases indicates that the Site was included on the States UST database. Refer to Sections 5 and 6 above for details regarding the three former USTs that were present at the Site that are reportedly closed. Vicinity properties were identified within the databases searched and within their respective radii are summarized below.

8.2.1 State and Tribal Hazardous Waste Site List including Equivalent NPL and CERCLIS

The State and Tribal Hazardous Waste Site List including Equivalent NPL and CERCLIS is maintained by NHDES and is a database of hazardous waste sites, including petroleum release sites. Based on our review of the information provided by EDR, there four State sites within a 1-mile radius of the Site; however, none are situated in an upgradient location relative to the subject Site.

8.2.2 State and Tribal Leaking USTs List

The State and Tribal LUST database is maintained by the NHDES and is a listing of sites where the source of the release has been determined to be a UST. Based on our review of the information provided by EDR, there is one LUST property within a 1/2-mile radius of the Site; however, none are situated in an upgradient location relative to the subject Site.

8.3 LOCAL REGULATORY AGENCIES

To obtain information concerning the possible release of petroleum products or hazardous substances at or near the Site, GZA contacted Town departments including the Assessor's office, the Building and Planning departments, the Health department, and the Fire Department. Information has been discussed and referenced in the text (refer to Section 4.7 for details regarding information found at the Fire Department specifically).

9.0 INTERVIEWS

GZA interviewed the Key Site Manager and property owner Mr. Rand of Rand Lumber as well as various municipal personnel in which information provided is discussed and referenced in the text.

10.0 USER RESPONSIBILITIES

GZA requested information from Changing Places regarding title information, environmental liens, Activity and Use Restrictions (AURs), and specialized knowledge or commonly known information regarding the Site and reason for significantly lower purchase price (if applicable). As defined in Section 6 of ASTM 1527-05, User responsibilities include the following:

- Reviewing land title records and lien records for environmental liens or AURs and reporting this information to the Environmental Professional;
- Communicating any "specialized knowledge or experience of the User" regarding Recognized Environmental Conditions at the property to the Environmental Professional;
- Communicating any "actual knowledge of the User" of any environmental lien or AURs;
- "Considering the relationship of the purchase price to the fair market value;" and
- Communicating any "commonly known or reasonably ascertainable" information regarding Recognized Environmental Conditions at the property to the Environmental Professional.

Refer to **Appendix G** for a questionnaire completed by a representative of ACM for the Site. The following generally summarizes the information included in the questionnaire:

- Changing Places was unaware of any environmental liens or AURs associated with the property;
- Changing Places indicated they have no specialized or experience regarding Recognized Environmental Conditions at the property other than what was conveyed to them by Mr. Rand in the disclosure package at the time of the sale of the property; and
- Changing Places indicated that the purchase price reflected fair market value.

Information provided to GZA by Changing Places has, as appropriate, been integrated in this report and is included in **Appendix G.**

11.0 FINDINGS AND CONCLUSIONS

A Phase I ESA following the general guidance of the ASTM Phase I Standard Practice E 1527-05 has been conducted at the property referred to as 511 Wallis Road located in Rye, New Hampshire. The study included a Site reconnaissance; a review of site history; a review of selected local, State, and federal regulatory records; a review of information provided by the Site Owner representative; and interviews with persons and agencies familiar with environmental

conditions at the Site. No chemical testing of soil or groundwater was conducted as part of this Phase I ESA.

This report presents GZA's field observations, results of research, and opinions related to apparent environmental conditions at the Site. This report is subject to modification if subsequent information is developed by GZA or any other party. This report is subject to the limitations presented in **Section 13.0** and **Appendix A**.

11.1 FINDINGS

The findings below are based on the work conducted as part of this assessment:

1. The Site consists of an irregular shaped 82.3-acre parcel of land consisting of two lots with the eastern most portions developed with several buildings associated with the former Rand Lumber operation. The on-site buildings are in various stages of disrepair including a retail sales office building, a planer mill, saw mill, drying kiln building, "lunch house", "oil shed", and three open (three sided) storage sheds. The following summary includes a description of the construction of each building:

    - The retail sales office building (circa 1905-1910, herein referred to as the Main Building) is an irregular shaped wood-framed, three story barn with a walk out basement, a poured concrete basement floor, wood siding and an asphalt shingle roof. Attached to the barn is a wood-framed and sided rectangular shaped open shed and enclosed former chicken coop. The building is heated via electric baseboard heat;
    - The Drying Kiln Building (circa 1986) is a roughly square shaped, single story, wood framed building on a poured concrete slab foundation with metal siding and a metal roof. The building is heated via electric baseboard heat;
    - The Planer Mill (circa 1930s) is a rectangular shaped single story, wood-framed structure with wood siding, a metal roof and a walkout basement with brick foundation walls and a poured concrete floor. The building has historically been heated by forced hot air fueled by a combination of wood and fuel oil;
    - The Saw Mill (circa 1905) is a rectangular shaped single story, wood-framed structure with wood siding, a metal roof and a basement with a combination wood timber, earthen, and poured concrete foundation floor. The building is not heated; however a large steam boiler fueled by oil was utilized through the 1950s to run equipment. The operation of the steam boiler provided a source of heat historically to this building;;
    - The Lunch House (circa 1930s) and Oil Shed buildings are small rectangular shaped single story, wood-framed structures with wood siding, a metal roof, and have wood timber floors on an earthen foundation. The Oil Shed is used to store various virgin and waste petroleum products. The Lunch House building is heated via electric baseboard heat and the Oil Shed building is not heated; and
    - The remaining open sided storage sheds, including the sawdust house were generally rectangular shaped single story, wood-framed structures with wood siding, had metal roofs, and earthen floors. None of these buildings were heated.

    The immediate vicinity of the lumber yard (northwest portion of the Site near the terminus of Patriots Way) includes an area that had recently been mined for sand and gravel (historically a lumber lay-down area), and is largely bermed on the northern,

eastern, and southern sides for Site storm water and erosion control purposes. Within the past year the Site owner has filled in a portion of this same area with imported blast rock comingled with various demolition debris.

A gravel road traverses the undeveloped western half of the Site, which includes rolling topography with areas of both upland and wetlands. Extensive areas of wooded wetlands are located centrally within the Site.

2. Based on the general topography of the Site and proximity to Berrys Brook and the western branch of Parson's Creek, groundwater flow beneath the Site is inferred to be in a north to northeasterly direction for the purposes of this study. A component of groundwater flow within the southernmost portions of the Site may be to the southeast towards the west branch of Parson's Creek.

3. Based on a review of available information, the Site appeared to be first developed in 1905 as a saw mill and lumber yard by Edgar Rand, and was operated by three generations of Rands until February 2013 when the business closed. Through its history, according to Mr. Rand, Rand Lumber primarily manufactured rough cut pine lumber for wholesale purposes. Initial buildings included the Saw Mill and the Main Building. The Planer Mill was constructed in the 1930s. Both the original Saw Mill and Planer Mill burned down in the 1930s, but were both rebuilt soon after.

   The Saw and Planer Mill equipment initially operated by steam engines; the original steam boiler fired by wood still exists today. The steam engines were replaced with electric motors in the 1950s and the steam boiler became obsolete. Fuel oil was stored in a 550-gallon UST located off the southeastern corner of the Planer Mill and was used for heating purposes in a combination fuel oil/wood burning furnace in the Planer Miller. No information was available with regards to the installation or possible closure dates for this UST.

   During the 1970s and 1980s, hydraulics were added to the saw carriage and de-barker. Some mill equipment was powered by a diesel-fired engine, and diesel fuel was stored in the on-site 275-gallon AST on a skid steer. The Drying Kiln Building was constructed in 1986 to facilitate drying of the wood products. In 1990 a hydraulic chipper and conveyor system was added at which time storage and/or disposal of waste lumber scraps ceased on-site and the wood chips were sold for retail purposes. Two additional gasoline USTs were located on-site including a 1,000-gallon UST with an associated single dispenser situated at the southern end of the open sided storage shed just west of the main building and a 500-gallon UST situated on the eastern side of the Main Building. These USTs were closed by removal in 1993 and 1989, respectively.

   Reportedly no chemical treatment of wood occurred during the history of the mill operations. Kerosene oil was applied as lubrication to steel chains and other equipment to aid in log movement through the production line; however, the buildings had a combination of poured concrete subfloors or wood floors. Sawdust on the floor generally absorbed excess oil. Typical practice was to burn the waste wood byproducts within the wood/oil boiler. Other waste products generated included scrap wood edges/trims, bark, and sawdust. These products were either given away or stockpiled and eventually disposed of on-site. Clean sawdust was offered for agricultural purposes and was typically not disposed of on-site unless a surplus existed. Once the Chipper was installed in 1990, virtually all wood waste went through the chipper and was sold as mulch.

   Beginning in 2004 limited gravel mining also occurred within the northeastern most portion of the Site. A permit was issued by the Town for approximately 25,000 cubic yards of gravel reclamation over a 143,500 square foot area, which continued until 2008. Over the past year, according to Mr. Rand, blast rock, boulders, sand and gravel, and

limited construction/demolition debris was accepted as fill at the Site from a local development in Rye and stockpiled within the footprint of the former gravel mining operation.

Rand Lumber had ceased operation and closed on December 7, 2012. At the time of GZA's site visit, Rand Lumber was in the process of liquidating its assets including all salvageable equipment and materials. Based on review of federal and State databases, GZA did not identify any properties nearby and upgradient that, in our opinion, would pose an adverse risk to the subject Site with the exception of the adjacent former Collins & Aikman Plant Site.

4. GZA reviewed historical environmental reports that confirmed that two USTs were closed by removal including: (1) a 550-gallon gasoline tank installed in 1961, had been emptied and placed out of service in 1975, and removed in 1989; and (2) a 1,000-gallon gasoline tank installed in 1980 and removed in 1993. Documentation including collection of soil samples at the time of removal indicated that no evidence of a release was observed at that time. A third UST (a 500-gallon fuel oil tank) is referenced and depicted on a figure however installation and possible removal dates were uncertain.

   During the Site visit conducted as part of the 2001 Environmental Transaction Screen, EEA noted the following Recognized Environmental Conditions:

   - "*...we observed that approximately 37 drums of waste liquids were improperly stored in the gravel pit on the subject property. Most of the drums are believed to contain waste motor oil, and several were observed to be leaking with associated soil staining. Second, additional petroleum products are improperly stored in the "oil shed" which also has soil staining underneath...*"; and
   - "*...we have identified two other concerns. (1) The property formerly contained two gasoline underground storage tanks and one partially buried fuel oil tank. No documented releases have been associated with these tanks, according to information provided by Mr. Jim Rand. (2) We have observed four areas of limited solid waste debris that was historically dumped in the wetland area behind the sawmill building...*"

   According to Mr. Rand, all drummed waste was removed and disposed of off-site; however no soil was excavated from the Site. The original ground surface in this area was not observed by GZA as imported blast rock and fill materials stockpiles occupy the entire area.

5. GZA made the following key observations:

   - Four exterior plastic 55-gallon drums of apparent waste oil situated on the eastern side of the oil shed. No staining of the ground surface was observed around the base of the drums.
   - Two sets of pole-mounted transformers (three per pole) located on the southeastern side of the Planer Mill and the southwestern side of the Dry Kiln Building. No labels were observed on the transformer to indicate whether or not they contained PCBs.
   - Solid waste disposal including scrap metal (metal binding straps for wood), a few apparently empty, rusted 55-gallon drums, plastics, wood, fragments of coal tar impregnated wood fiber pipe (commonly referred to as "Orangeburg" or "Bermico"), and other miscellaneous debris on the ground surface in a wet area north of the Saw Mill / Planer Mill buildings during our site reconnaissance.

GZA also observed wood waste to have been disposed of in historical windrows northeast of the Saw Mill / Planer Mill buildings.

- An area formerly used for gravel reclamation had been recently filled with stockpiles of blast rock, boulders, sand and gravel, and limited construction/demolition debris, which was accepted as fill at the Site from a local development in Rye.
- A groundwater seep flowing into a forested wetland area just northeast of the sawdust house. The surface water within the area proximate to the seep contained an iron precipitate. The surface water and precipitate did not display any odors nor a visible sheen, and was concluded to be a natural occurrence.
- Virgin and waste petroleum products and hazardous materials in various sizes and types of apparent original small containers stored within the oil shed building. The floor of the oil shed was not visible based on the number and types of containers. A 275 gallon AST was also observed in the oil shed that reportedly contains diesel fuel. Minor petroleum-like staining was observed on the exterior wall at the base of the shed in several locations and on the ground surface suggesting that materials stored within the building have leaked over time.

  Following our April 3, 2013 Site visit, Mr. Rand coordinated with and had the contents of the oil shed (and the four exterior 55-gallon drums) over-packed and disposed of off-site. GZA returned to the Site on April 16, 2013 following their removal. The oil shed was observed to be empty and had been moved to expose the ground surface beneath the oil shed. GZA observed minor surficial staining around the foot print of the shed; however, this staining appeared to be limited to the ground surface.
- Oily sawdust/wood chips within the interior of the Saw Mill and Planer Mill buildings. According to Mr. Rand, kerosene oil was applied as lubrication to steel chains and other equipment to aid in log movement through the production line; however, the buildings had a combination of poured concrete subfloors or wood floors. Sawdust on the floor generally absorbed excess oil. Typical practice was to burn the waste wood byproducts within the wood/oil boiler. One area of oily sawdust/wood chips observed within the Planer Mill was the location of a former air compressor. According to Mr. Rand the oil observed was likely hydraulic oil from the compressor that resided at that location prior to being sold/removed from the building. GZA noted that an earthen floor was observed beneath the oily sawdust/wood chips in this area.
- Oil stained surfaces within a small maintenance/machine area in the Planer Mill. No floor drains were observed on the concrete floor.

6. Based on review of federal and State databases, GZA did not identify any properties nearby and upgradient that, in our opinion, would pose an adverse risk to the subject Site.
7. GZA requested information from Changing Places regarding title information, environmental liens, AURs, and specialized knowledge or commonly known information regarding the Site and reason for significantly lower purchase price (if applicable). Based on the information provided in a questionnaire Changing Places generally indicated the following:
   - Changing Places was unaware of any environmental liens or AURs associated with the property;

- Changing Places indicated that they have no specialized or experience regarding Recognized Environmental Conditions at the property; and
- Changing Places indicated that the purchase price reflected fair market value.

11.2 CONCLUSIONS AND OPINIONS

Based on the findings presented above, it is GZA's opinion that "we have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Site referred to as 511 Wallis Road located in Rye, New Hampshire." It is GZA's opinion that based on the review of available information and our observations made at the Site, the following Recognized Environmental Conditions were found in connection with the Site:

1. The historical Recognized Environmental Condition (HREC) associated with the former presence of USTs at the Site. Closure documentation exists for two of the three former USTs.

   No further assessment is warranted at this time; however, should an abandoned UST be encountered during redevelopment of the Site, Changing Places will be required to register the UST and close the UST by removal in accordance with the applicable State standards.

2. This historical drum storage area within the gravel reclamation area where EEA observed "*...approximately 37 drums of waste liquids were improperly stored in the gravel pit on the subject property. Most of the drums are believed to contain waste motor oil, and several were observed to be leaking with associated soil staining.*" Mr. Rand indicated that the drums were removed and disposed of off-site and only limited soil staining was observed; however, removal of surficial stained soil was conducted. This area has been subsequently filled in with blast rock and imported fill.

   No further assessment is warranted at this time; however, should isolated areas of petroleum-impacted soil be encountered during redevelopment of the Site, that soil will require proper management and disposal. GZA recommends that a soil management plan be developed that describes proper handling, management and disposal of petroleum-impacted soil.

3. GZA observed oily sawdust/wood chips within the interior of the Saw Mill and Planer Mill buildings that according to Mr. Rand consisted of kerosene oil which was applied as lubrication to steel chains and other equipment. One area of oily sawdust/wood chips observed within the Planer Mill was the location of a former air compressor. According to Mr. Rand, the oil observed was likely hydraulic oil from the compressor that resided at that location prior to being sold/removed from the building. No information was available to indicate if the hydraulic oil contained PCBs. GZA noted that an earthen floor was observed to exist beneath the oily sawdust/wood chips in this area. GZA also observed oil stained surfaces within a small maintenance/machine area in the Planer Mill.

   No further assessment is warranted at this time; however, should petroleum impacted building materials and/or areas of petroleum-impacted soil be encountered during redevelopment of the Site, that material will require proper management and disposal. GZA recommends that a soil management plan be developed that describes proper handling, management and disposal of petroleum-impacted soil.

12.0 ENVIRONMENTAL PROFESSIONAL STATEMENT

"I declare that, to the best of my professional knowledge and belief I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 12; I have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property; and I have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312." The signature of the Environmental Professional is contained on the cover page of this report. Refer to **Appendix H** for a copy of the Environmental Professional's resume.

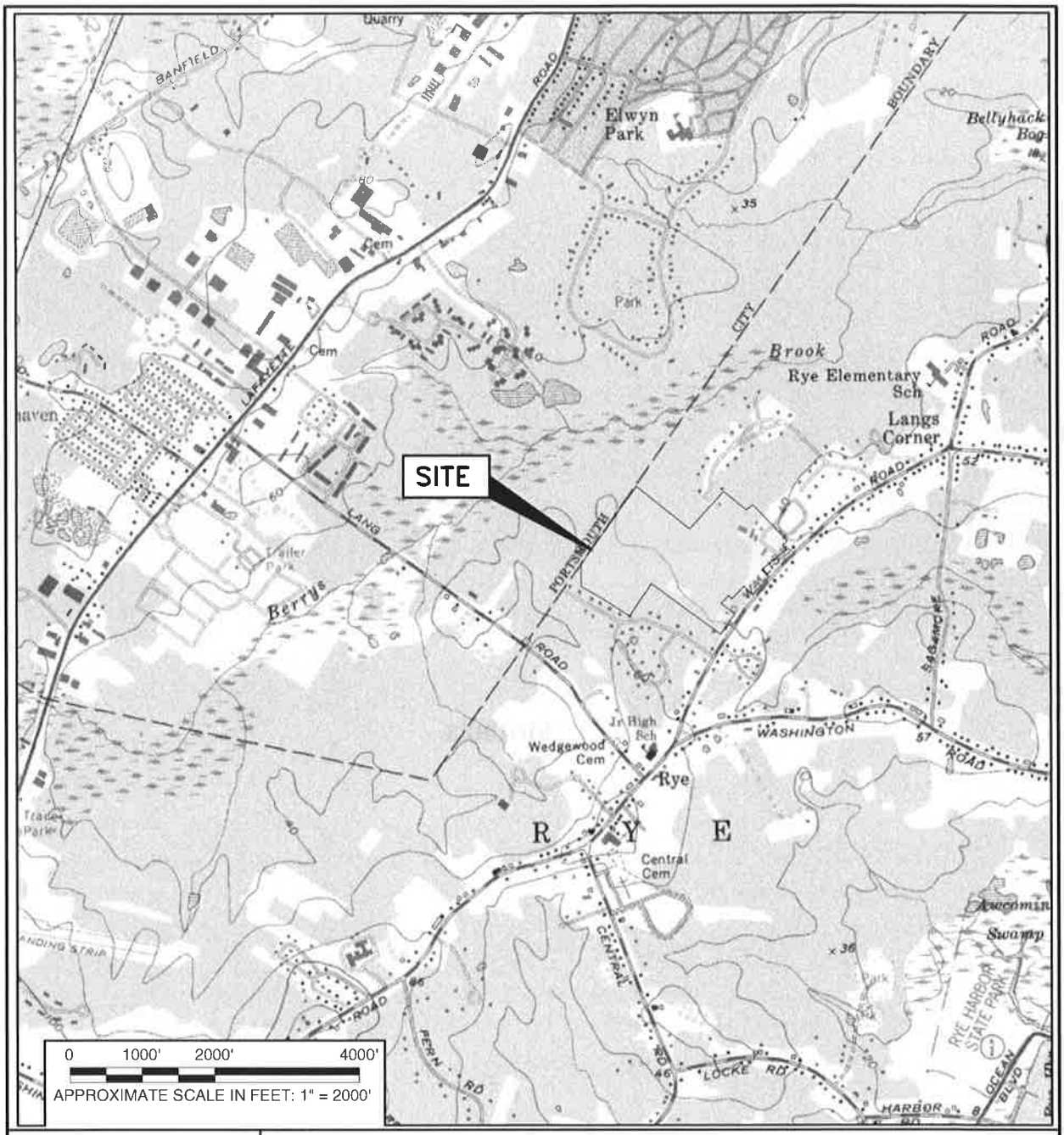
13.0 LIMITATIONS

GZA's site assessment was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area, and GZA observed the degree of care and skill generally exercised by other consultants under similar circumstances and conditions. GZA's findings and conclusions must be considered not as scientific certainties, but rather as our professional opinion concerning the significance of the limited data gathered during the course of the ESA. No other warranty, express or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no hazardous material, oil or other latent condition beyond that observed by GZA during its site assessment. This report is also subject to the specific limitations contained in **Appendix A.**

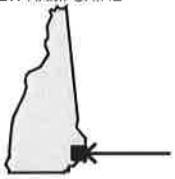
It should be noted that when an assessment is completed without subsurface explorations and chemical screening of soil and groundwater beneath the Site, no data can be generated regarding latent subsurface conditions which may be the result of on-site or off-site sources.

This study and report have been prepared on behalf of and for the exclusive use of Changing Places solely for use in an environmental assessment of the Site. This report and findings contained herein shall not be relied on by any other party in whole or in part, without the prior written consent of GZA.

FIGURES



NEW HAMPSHIRE



QUADRANGLE LOCATION

SOURCE:

BASE MAP FROM THE FOLLOWING USGS QUADRANGLE MAP:
PORTSMOUTH, NH (1956) REVISED 1993

DIGITAL TOPOGRAPHIC MAPS PROVIDED BY USGSSTORE.GOV.

CONTOUR ELEVATIONS REFERENCE NAVD 88,
CONTOURS ARE SHOWN AT 20' INTERVALS

N W E S

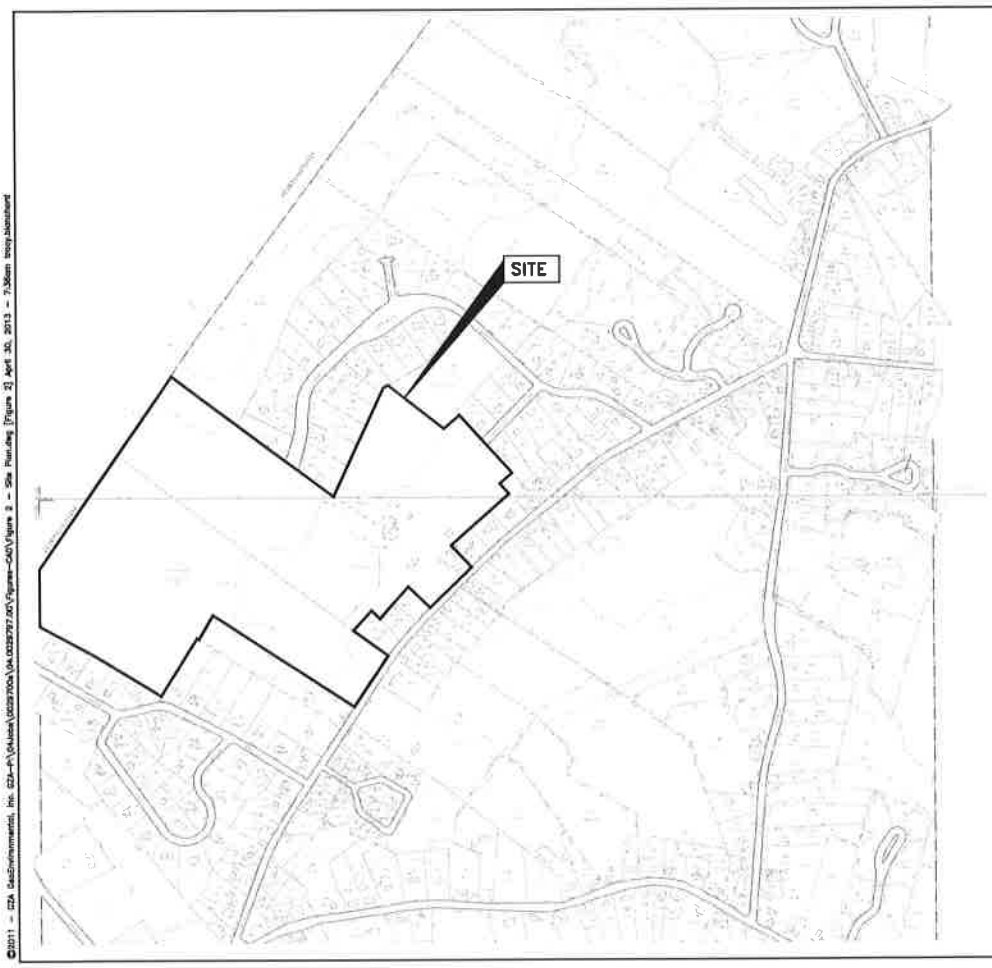
FORMER RAND LUMBER
PHASE I ENVIRONMENTAL SITE
511 WALLIS ROAD, RYE, NEW HAMPSHIRE

PREPARED BY:
GZA GeoEnvironmental, Inc.
Engineers and Scientists
www.gza.com

PREPARED FOR:
CHANGING PLACES, LLC
DOVER, NEW HAMPSHIRE

LOCUS PLAN

PROJ MGR: DZ	REVIEWED BY: JCM	CHECKED BY: ATD	FIG 1
DESIGNED BY: ATD	DRAWN BY: TDB	SCALE: 1"=2000'	
DATE: APRIL 2013	PROJECT NO. 04.0029797.00	REVISION NO.	SHEET NO.



NOTES:

1) BASE MAP DEVELOPED FROM PLANS PROVIDED BY SEACOAST ENGINEERING ASSOC. INC., ENTITLED "TOWN OF RYE," DATED AND REVISED 4-1-2012, ORIGINAL SCALE 1"=200',.

LEGEND:

SITE BOUNDARY LINE

N

NO.	ISSUE/DESCRIPTION	BY	DATE

FORMER RAND LUMBER
611 WALLIS ROAD
RYE, NEW HAMPSHIRE

SITE BOUNDARY PLAN

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com

PREPARED FOR: CHANGING PLACES, LLC DOVER, NEW HAMPSHIRE

ENGINEER	EJ	REVIEWED BY	JDM	CHECKED BY	EJ	FIG.
DESIGNED BY	ATD	DRAWN BY	TSK	SCALE	N.T.S.	2
DATE	APRIL 2013	PROJECT NO.	04.0029797.00	REVISION NO.		SHEET NO.

APPENDIX A

LIMITATIONS