



The State of New Hampshire
Department of Environmental Services



Thomas S. Burack, Commissioner

EMAIL ONLY

May 5, 2015

Ms. Theresa Walker
Brownfields Coordinator
Rockingham Planning Commission
156 Water Street,
Exeter, NH 030833

Subject: **Exeter** - Dagostino Rose Farm Property, Oak Street Extension
DES Site **#201203003**, Project #27859

Preliminary Phase II ESA, prepared by CREDERE Associates, LLC. dated April 5, 2013

Dear Ms. Walker:

The New Hampshire Department of Environmental Services (the Department) has reviewed the above-referenced Preliminary Phase II Environmental Site Assessment (the Preliminary Phase II) submitted on your behalf by CREDERE Associates, LLC. The investigation was funded by a United States Environmental Protection Agency (EPA) Brownfield Assessment Grant made to the Rockingham Planning Commission to assess petroleum contamination. The Preliminary Phase II contains the results of investigations of the petroleum-related recognized environmental conditions (RECs) identified in the Phase I Environmental Site Assessment Report dated April 23, 2012. Each REC is described below along with the Department's findings:

REC#1: Documentation of past use of pesticide.

Pesticide residue may still be present in areas where the pesticide was mixed, applied and in drainage from these areas. These include the area near a wooden spray tank, planting beds, greenhouse underdrain systems, and the pond to the west of the Packing House, which received the drainage from the greenhouse. This REC was not evaluated in the Preliminary Phase II. The Department agrees with the recommendation that additional sampling is necessary to evaluate these areas. At a minimum a proposal to conduct soil sampling in and around the above-mentioned areas of concern, and sediment and surface water sampling in the stream, wetlands and pond is needed.

REC#2: Possible releases of petroleum and hazardous materials during the operation of a former Boiler House and former 30,000-gallon #6 fuel oil underground storage tank (UST).

No evidence of a release of fuel from the former UST was observed during the Preliminary Phase II investigation. One near-surface soil sample showed a concentration of the polycyclic aromatic hydrocarbon (PAH) benzo(a)pyrene that slightly exceeded the New Hampshire Soil Remediation Standard (SRS). Two deeper soil samples in this area showed arsenic above the SRS. The Department agrees with the recommendation to conduct additional sampling to determine the nature and extent of the PAH and arsenic levels in this area to evaluate if these



are a result of a release or fall under the Department's definition of background included in Env-Or 602.03. Groundwater samples analyzed from monitor wells CA-MW-1 and CA-MW-4 did not detect volatile organic compounds or metals above the Ambient Groundwater Quality Standards (AGQS).

REC#3: Observation of coal ash and clinker dumping west of the former Boiler House.

This REC was not evaluated in the Preliminary Phase II. The Department agrees with the recommendation that additional evaluation of this area is necessary. This evaluation should determine the vertical and horizontal limits of waste, the volume of the material and pictures to show the proportion of waste to soil. The evaluation should include a characterization of the waste material and an evaluation of the extent to which the material may have impacted soil and groundwater at the Site.

REC#4: Potential releases of petroleum or hazardous materials during historic use of the open-ended oil change pit.

The Report states there was no visual evidence of a release, and soil and groundwater analytical results from nearby CA-SB-2 and CA-MW-2 did not detect concentrations of VOCs, PAHs, polychlorinated biphenyls (PCBs) or RCRA 8 metals above regulatory standards. In the absence of data indicating a release of petroleum or hazardous materials detected in the soil and groundwater samples collected near this oil change pit, the Department agrees with the Preliminary Phase II conclusion that this REC should be dismissed.

REC#5: A 100-gallon gasoline UST southeast of the Packing House.

A ground-penetrating radar and metal detector survey in the area of the suspected 100-gallon UST detected no evidence of the continued presence of a tank. A groundwater and soil samples collected downgradient of the suspected tank location showed no evidence of impacts from gasoline releases. The Department agrees with the Preliminary Phase II conclusion that this REC should be dismissed.

REC#6: Solid waste and refuse dumping to the west of the Packing House.

This REC was not evaluated in the Preliminary Phase II. The Department agrees with the recommendation that additional evaluation of this area is necessary. The evaluation should include a characterization of the type of waste, the vertical and horizontal limits of waste and determine if petroleum and/or hazardous materials in the waste may have impacted soil and groundwater in the vicinity.

REC#7: Automotive maintenance and repair in the three bay garage, central portion of the site.

Soil and groundwater samples collected from two borings and one monitoring well in the vicinity of the three bay garage did not show evidence of a release of petroleum or hazardous materials. Analysis of one deeper soil sample, from boring CA-SB-8, detected a concentration of arsenic above the Department's SRS. The Department agrees with the Preliminary Phase II recommendation to conduct additional sampling to determine if the presence of arsenic in this sample is the result of a release or if it falls under the Department's definition of background included in Env-Or 602.03. Additionally, a second round of groundwater samples is not required since the initial analyses did not detect concentrations of VOCs or metals above the AGQS. The Preliminary Phase II notes that access to the interior of the three bay garage has not yet

been obtained. Access and inspection of the interior should be completed before this REC is dismissed.

REC#8: Out-of-service 275-gallon fuel oil AST behind the abandoned mobile home.

Evidence of surface spills of fuel oil were not noted during the Phase I investigation around the out-of service 275-gallon fuel oil aboveground storage tank (AST) behind the abandoned mobile home. Two soil samples collected near the AST during this investigation did not show any VOCs, PAHs, or diesel-range petroleum hydrocarbons to indicate a release had occurred from this AST. The Department agrees with the Preliminary Phase II conclusion that this REC should be dismissed.

The Department's rules do not regulate residential fuel oil aboveground storage tanks. However, residential aboveground storage tanks are regulated by the Department of Safety's State Fire Code which refers to the latest version of the National Fire Protection Association's (NFPA) Codes and Standards. Please refer to the 2011 NFPA Codes and Standards, Chapter 31, "Standard for Installation of Oil Burning Equipment" for information about properly abandoning out-of-service fuel oil ASTs.

Recommendations for Further Work

Due to funding restrictions, the Preliminary Phase II investigation was limited to petroleum RECs. The Phase II recommends further work be completed to investigate some of the non-petroleum RECs at the site. Some additional work is proposed to confirm the results of this investigation and fill identified data-gaps. The Department generally agrees with the recommendations for further work to complete a comprehensive Phase II investigation for the site.

Additionally, the Department recommends that surface water and sediment sampling be incorporated in plans to complete the Preliminary Phase II, as well as a hazardous building materials survey completed on all site structures. Please also include information regarding the location and use of any on site leach fields servicing the property, and include plans to assess any impact to soils and groundwater. The Department notes that there was no investigation conducted during this phase of work on Lot 5. Based on the site use for agricultural/horticultural purposes, the Department recommends including plans to assess soil and groundwater quality in the vicinity of the sheds located on Lot 5. Finally, please ensure that a survey of all current and future monitor well locations be completed and a groundwater contour plan developed.

Please submit a scope of work for the Department's review prior to commencing the work. The work scope should be designed to address the above-mentioned comments, meet the requirements of *ASTM E1903-11 Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process* and the requirements for a Site Investigation under New Hampshire Code of Administrative Rules Env-Or 600 *Contaminated Site Management*, Env-Or 606.01(b) and Env-Or 606.03.

Ms. Theresa Walker
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May 5, 2015
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Should you have any questions regarding this letter, please write me at the address below or call me at the Waste Management Division.

Sincerely,



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Waste Management Division
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ec: Rebecca Williams, Supervisor, HWRB
Jennifer Marts, Supervisor, ORCB
Judd R. Newcomb, CREDERE Associates, LLC
Attention Health Officer, Town of Exeter

cc: Frank Dagostino, 7420 S. Ocean Drive, Jensen Beach FL 34957