

**DES Waste Management Division  
29 Hazen Drive; PO Box 95  
Concord, NH 03302-0095**

**Additional Information Regarding Site Activities**

Former Rand Lumber Company  
511 Wallis Road (Site)  
DES Site #198604301, SITEEVAL Project #34669  
Rye, New Hampshire

Prepared For:  
Wallis Road Properties LLC  
42 J Dover Point Road  
Dover, New Hampshire 03820  
(603) 749-3800  
Mr. John O'Neill

Prepared By:  
GZA GeoEnvironmental, Inc.  
5 Commerce Park North, Suite 201  
Bedford, New Hampshire 03110  
Phone Number: (603) 232-8748  
Contact Name: Mr. Jeffrey D. Rowell, P.E.  
Contact Email: Jeffrey.Rowell@gza.com  
GZA File No. 04.0190740.00

Date of Report: August 22, 2017



*Proactive by Design*

GEOTECHNICAL

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MANAGEMENT

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## Via Email

August 22, 2017

File No. 04.0190740.00

Mr. Todd E. Piskovitz  
Oil Remediation and Compliance Bureau  
New Hampshire Department of Environmental Services  
PO Box 95, 29 Hazen Drive  
Concord, New Hampshire 03302-0095

Re: Former Rand Lumber Company  
511 Wallis Road (Site)  
DES Site #198604301, SITEEVAL Project #34669  
Rye, New Hampshire

Dear Mr. Piskovitz:

In response to your letter dated June 27, 2017 requesting additional information regarding Site activities, GZA GeoEnvironmental, Inc. (GZA) is pleased to provide the New Hampshire Department of Environmental Services (NHDES) this summary letter and related attachments. This letter is subject to modification if subsequent information is developed by GZA or any other party and is subject to the attached Limitations.

## BACKGROUND

GZA completed a Phase I Environmental Site Assessment (ESA) Report for the Site dated June 21, 2013. Based on the review of available information and observations made at the Site in 2013, GZA concluded that the following Recognized Environmental Conditions were identified in connection with the Site; there remains one underground storage tank (UST) without proper closure documentation and in two locations on site where limited stained oil had been observed.

GZA concluded that no further assessment was warranted for the above areas of concern; however, GZA indicated that should petroleum-impacted building materials and/or areas of petroleum-impacted soil be encountered during redevelopment of the Site, that material would require proper handling and disposal.

We understand that site development activities were conducted in 2014 and 2015. On behalf of Wallis Road Properties LLC, the Site developer, GZA prepared a letter dated December 18, 2014 that addressed four environmental concerns identified by the Town of Rye (Town) during a meeting on December 4, 2014 between the Town, Wallis Road Properties LLC and GZA. The December 2014 letter prepared by GZA described observations during site visits conducted on December 4 and 11, 2014



relative to the four environmental concerns identified by the Town. The letter concluded that no areas of stained soil were observed on those dates in the areas of concern identified by the Town.

NHDES prepared a letter dated June 27, 2017 requesting certain additional information no later than August 31, 2017. The following five items were identified by NHDES as requiring responses:

- a. Clarification of the source of the waste material documented by certain manifests and whether they relate to the recognized environmental conditions identified in GZA's Phase 1 ESA or EEA's transaction screen;
- b. Any additional copies of waste manifests for removal of drums and other hazardous materials not already on file at NHDES;
- c. Any laboratory analytical data of soil sampling conducted in areas of petroleum staining including, but not limited to, former drum storage areas and former UST locations;
- d. Any photographic documentation or field notes with observations of subsurface conditions during the redevelopment, if available; and
- e. Documentation, if available, related to the 1990s-saddle tank release noted in EEA's transaction screen.

## RESPONSE TO INFORMATION REQUEST

Following receipt of the June 27, 2017 letter from NHDES, Wallis Road Properties LLC provided GZA with site inspection reports prepared by AMEC Earth and Environmental of South Portland, Maine and ASI of Exeter, New Hampshire during site development activities, and requested GZA prepare this response letter on their behalf. The responses below address each of the five items listed above, which are also identified in italics below to facilitate review.

*"Clarification of the source of the waste material documented by certain manifests and whether they relate to the recognized environmental conditions identified in GZA's Phase 1 ESA or EEA's transaction screen."*

Based on information within the NHDES OneStop database, we understand that this item references waste manifests dated May 2002 and April 2013. GZA was not present at the Site during waste disposal activities conducted as documented by those manifests. However, based on our discussions with the former owner Mr. Rand as documented in the June 2013 ESA Report, the May 2002 manifest is reportedly associated with removal of drums that were located in the gravel pit and which were identified in the April 2001 Environmental Transaction Screen Report prepared by Exeter Environmental Associates, Inc (EEA). The April 2013 manifest is reportedly associated with removal of four exterior 55-gallon drums located adjacent to the oil shed and includes contents of the oil shed which were over-packed and disposed off-Site. Information associated with this activity is also provided in GZA's June 2013 ESA Report.

*"Any additional copies of waste manifests for removal of drums and other hazardous materials not already on file at NHDES."*

GZA inquired with Wallis Road Properties LLC and they reported that no additional waste disposal documentation exists to their knowledge based on their site development activities and their communications with the former owner Mr. Rand.



*"Any laboratory analytical data of soil sampling conducted in areas of petroleum staining including, but not limited to, former drum storage areas and former UST locations."*

GZA's June 2013 ESA Report did not recommend any assessment of surficial soils in the areas referenced, nor in any other areas of the Site. Our report stated that if areas of petroleum-impacted soil were observed during site development activities, a soil management plan should be developed to manage those soils properly. GZA's letter dated December 18, 2014 describes our observations during Site development activities on December 4 and 11, 2014. Based on our visits performed on those dates, no evidence of significantly stained surficial soil was identified at the Site. We inquired with Wallis Road Properties LLC if any laboratory analytical data was obtained during Site development activities, and they reported that no such analytical testing was performed and that no petroleum-impacted areas were encountered during Site development activities.

*"Any photographic documentation or field notes with observations of subsurface conditions during the redevelopment, if available."*

GZA obtained reports provided by Wallis Road Properties LLC documenting Site development activities on July 31, August 5, and September 17, 2014. Those reports include photo documentation of activities on those dates. A copy of those reports is attached hereto.


*"Documentation, if available, related to the 1990s-saddle tank release noted in EEA's transaction screen."*

No additional information is available relative to this spill event, which was related anecdotally by Mr. Rand during EEA's 2001 Environmental Transaction Screen. EEA did not note any surficial evidence of this event during their 2001 site visit.

We trust this information satisfies the request for additional information presented in the NHDES letter dated June 27, 2017.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

  
Jeffrey D. Rowell, P.E.  
Associate Principal

  
John C. Murphy, CCM, CHMM  
Consultant/Reviewer

JDR/JCM:kr

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cc: Mr. John O'Neill, Wallis Road Properties LLC

Attachments: Limitations  
2014 Field Reports with Associated Photographs



## **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 Wallace 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 12, 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.



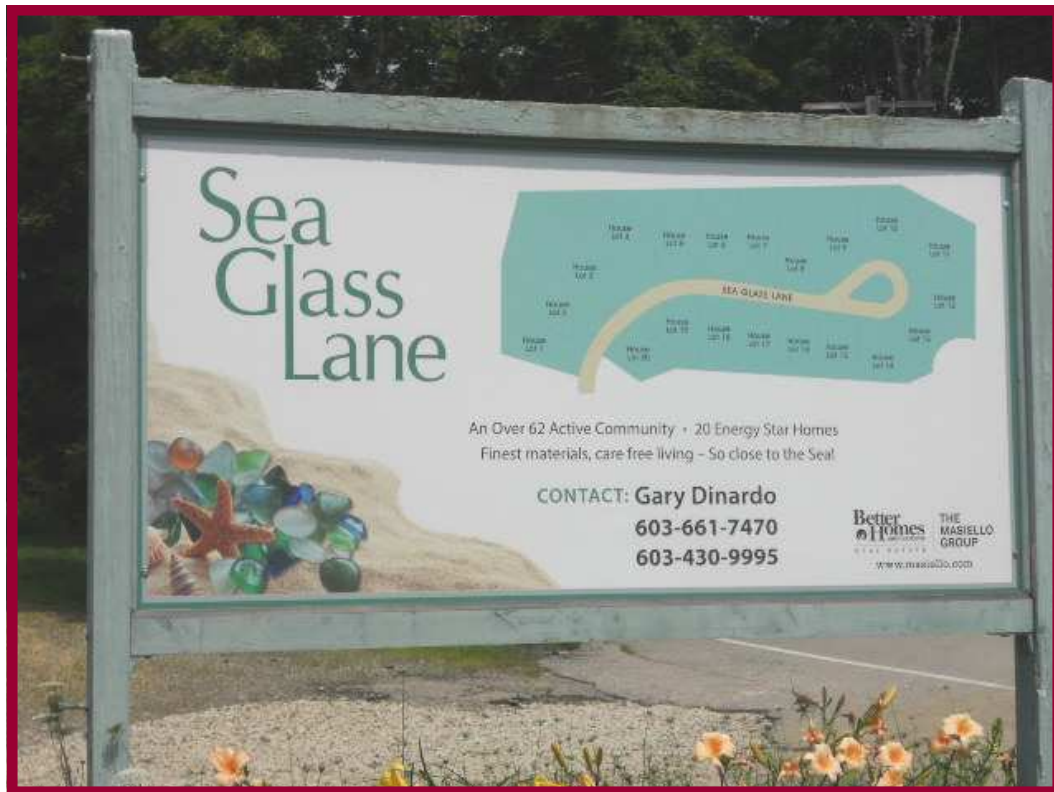
## **2014 Field Reports with Associated Photographs**

**NSB-1410-1**  
**WALLIS ROAD PROPERTIES, LLC**  
**511 WALLIS ROAD**  
**RYE, NH 03870**

**RE: 7-31-2014 1:30 PM INSPECTION**



**11A Hampton Rd.**  
**Exeter, NH 03833**  
**Phone: (603) 772-1180**  
**Fax: (603) 772-1181**



**ENTRANCE**



## **SITE INSPECTION**

Sea Glass Lane at Rand RCD, Rye

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**PROJECT NO:** 3618148387

**DATE:** Wednesday, August 5, 2014

**REPORT NUMBER:** 2

**WEATHER:** Sunny, 78 degrees

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### **1. CONTRACTOR:**

- PK Brown, Site Contractor

### **2. AMEC INSPECTOR(S):**

- Steve Harding

### **3. VISITORS/PERSONNEL ON-SITE:**

- Peter Brown, PK Brown

### **4. WORK COMPLETED OR UNDERWAY:**

- Water line installed through the site and connection has been made to Patriots Way water line.
- Drainage structures and piping has been progressed in the road.
- The Contractor has excavated for the bioretention pond near the entrance to the site.
- Roadway subgrade prepared and will be ready for subbase gravel once the underground electrical has been installed. Contractor stated that the geotechnical firm of Turner will be used for providing a gradation test of the subbase and base materials as well as compaction test once placed and compacted.

### **5. EROSION AND SEDIMENT CONTROL:**

- A heavy rainstorm has occurred in the past 24 hours. The site appears to have handled the runoff and drains well. No issues were noted.
- Erosion control mix berm has been placed along the property line of the site down gradient from any areas of proposed work.
- Construction entrance has been installed near Wallis Road
- No offsite sediment transported was noted.

### **6. PROBLEMS OR DELAYS:**

- Some issues have arisen with elevations and additional information requested on the gravel wetland. Contractor and design engineer have been discussing and elevation adjustments are proposed. From information reviewed at the site with the contractor, it appears that the changes are relatively minor and some more detail has been provided to assist the contractor in understanding the design intent.
- An elevation problem with the cross culvert at Station 2+14 was discovered in that the proposed outlet elevation would be too low to work with the receiving areas. Contractor has been in contact with the design engineer for a resolution.



## **SITE INSPECTION**

Sea Glass Lane at Rand RCD, Rye

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**PROJECT NO:** 3618148387

**DATE:** Wednesday, September 17, 2014

**REPORT NUMBER:** 4

**WEATHER:** Sunny, 65 degrees

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### **1. CONTRACTOR:**

- PK Brown, Site Contractor

### **2. AMEC INSPECTOR(S):**

- Tim Michaud

### **3. VISITORS/PERSONNEL ON-SITE:**

- PK Brown Personnel

### **4. WORK COMPLETED OR UNDERWAY:**

- Gravel wetland plantings have been installed and watered.
- Contractor has completed installation of the bioretention pond material buildup near the entrance to the site.
- AMEC inspected the cross culvert installation during the site visit and found that the cross culvert is operating as intended. However, no recent storm events have occurred.
- Roadway subgrade gravel installation appears complete from Station 0+00 at Wallis Road to approximately Station 6+00.

### **5. EROSION AND SEDIMENT CONTROL:**

- Erosion control mix berm are still in place and functioning as intended along the property lines of the site down gradient from any areas of proposed work.
- No offsite sediment transported was noted.

### **6. PROBLEMS OR DELAYS:**

- None

### **7. EQUIPMENT ON SITE:**

- Loader
- Excavators
- Material Processing Equipment
- Trucks

### **8. QUESTIONS OR INSTRUCTIONS RECEIVED:**

- None

### **9. INSTRUCTIONS TO CONTRACTOR:**

- None



## 10. ADDITIONAL INFORMATION:

Recent information provided by J. Kevin Hayes, PE, CPESC, LPA, Civil Takeoffs, LLC, on behalf of PK Brown includes the following:

- Bank run gravel field tests for compaction passed and are awaiting results in writing from JTC and will forward upon receipt.
- JTC will be testing in place densities of the crushed gravel as it is placed and forward results upon completion.
- Bourassa paving is scheduled to fine grade and pave the binder course next week on Monday, September 22, 2014 (subject to weather changes).
- Sloped granite edging is scheduled to be placed the week of the 22<sup>nd</sup>.
- Per conversation between Dennis McCarthy and PK, the existing CB on Wallis Road will be changed to a drainage manhole frame and cover (30") as it will not catch water when the new road is paved. A DMH frame and cover will leave less of a bump (set flush).
- Turner geotechnical information for gradation testing of the subbase and base materials as well as compaction tests should be provided to AMEC for review when completed.
- Please find attached sieve analysis and Proctor (S.W. Cole) for the crushed gravel (NHDOT 304.3) originating from Severino Trucking's Dover pit.
- AMEC reviewed the sieve analysis and the results indicate the gravels appear to meet NHDOT Gravel 304.3 specifications.

### WRITTEN/SUBMITTED BY:

Tim Michaud, EIT  
AMEC Environment & Infrastructure, Inc.

Distribution: Kim Reed, Planning and Zoning Administrator, Town of Rye  
Dennis McCarthy, Public Works Director, Town of Rye  
John O'Neil, Wallis Road LLC  
Peter Brown, PK Brown  
Peter Rowell, Building Inspector  
Christian Smith, Beals Associates  
Kevin Hayes, Civil Takeoffs, LLC  
Caitlyn Abbott, AMEC Environment & Infrastructure, Inc.  
Stephen D. Harding, P.E., AMEC Environment & Infrastructure, Inc.

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## SITE PHOTOGRAPHS



Figure 1 – Sea Glass Lane Subbase Installation



Figure 2 - Gravel Wetland with Plantings



Figure 3 - Gravel Wetland with Plantings



Figure 4 - Site Work along Sea Glass Lane



Figure 5 - Installed Gravel Subbase Adjacent to Wallis Road



- Since the site visit, AMEC has followed up with the design engineer, Christian Smith, and is currently evaluating the changes that have been suggested for the gravel wetland and cross culvert elevations.

#### 7. EQUIPMENT ON SITE:

- Loader
- Excavators
- Material Processing Equipment
- Trucks

#### 8. QUESTIONS OR INSTRUCTIONS RECEIVED:

- None

#### 9. INSTRUCTIONS TO CONTRACTOR:

- None

#### 10. ADDITIONAL INFORMATION:

- The waterline connection in Washington Road is scheduled for Tuesday, August 11<sup>th</sup>. This connection will be a 12-inch x12-inch x 8-inch tee and will require removal of 50 feet of existing water line addressing other sections of water lines coming from the site. **This connection will require shutting off of the water line in Wallis Road and will affect over 150 residences for a possible duration of 4 to 6 hours.** The contractor explained his approach which has been approved by the Water District representative.

#### WRITTEN/SUBMITTED BY:

Steve Harding, AMEC Environment & Infrastructure

Distribution: Kim Reed, Planning and Zoning Administrator, Town of Rye  
Dennis McCarthy, Public Works Director, Town of Rye  
John O'Neil, Wallis Road LLC  
Peter Brown, PK Brown  
Peter Rowell, Building Inspector  
Christian Smith, Beals Associates  
Kevin Hayes, Civil Takeoffs, LLC  
Caitlyn Abbott, AMEC

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## SITE PHOTOGRAPHS



Photo 1: Subgrade preparation in roadway.



Photo 2: Roadway being prepared for gravel with drainage infrastructure in place.

**NSB-1410-1  
WALLIS ROAD PROPERTIES, LLC  
511 WALLIS ROAD  
RYE, NH 03870**

**RE: 7-31-2014 1:30 PM INSPECTION**



**11A Hampton Rd.  
Exeter, NH 03833  
Phone: (603) 772-1180  
Fax: (603) 772-1181**



**ENTRANCE AS SEEN FROM WALLIS ROAD**

**NSB-1410-1  
WALLIS ROAD PROPERTIES, LLC  
511 WALLIS ROAD  
RYE, NH 03870**

**RE: 7-31-2014 1:30 PM INSPECTION**



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**BIORETENTION POND**



**CURB VALVES ARE IN PLACE**



**CUL-DE-SAC AREA**



**HYDRANT**

**NSB-1410-1  
WALLIS ROAD PROPERTIES, LLC  
511 WALLIS ROAD  
RYE, NH 03870**

**RE: 7-31-2014 1:30 PM INSPECTION**



**11A Hampton Rd.  
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**BACK SIDE OF THE CUL-DE-SAC**



**DRAINAGE STRUCTURES**



**HEADWALLS**



**DRAINAGE PIPE**

**NSB-1410-1  
WALLIS ROAD PROPERTIES, LLC  
511 WALLIS ROAD  
RYE, NH 03870**

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Exeter, NH 03833  
Phone: (603) 772-1180  
Fax: (603) 772-1181**



**TOWN WATER VALVE / T**



**LOOKING OUT TOWARDS THE  
ENTRANCE FROM ABOUT LOT  
# 7**



**DRAINAGE STRUCTURES**



**DRAINAGE STRUCTURES**