



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

July 17, 2018

Todd Baker
Exeter Rose Farm, LLC
953 Islington Street, Suite 23D
Portsmouth, NH 03801

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

Supplemental Site Investigation and Remedial Action Plan, prepared by
StoneHill Environmental, Inc., dated December 21, 2017

Dear Mr. Baker:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the *Supplemental Site Investigation and Remedial Action Plan* prepared for the site referenced above. This document was prepared by StoneHill Environmental, Inc. (StoneHill) on behalf of Exeter Rose Farm, LLC. Based on our review, the following comments must be addressed to the satisfaction of NHDES before an approval can be issued:

Former Greenhouse Area

- StoneHill indicates that the lead-impacted soil within the greenhouse area will be removed in 50 x 50 foot grids to approximately 2 feet below ground surface (bgs). The excavated soil from each grid will be stockpiled in approximately 200 ton piles. Representative composite soil samples will then be collected from each pile and analyzed for total lead. Soils with lead concentrations equal to or greater than the soil remediation standard (SRS) of 400 mg/kg will be shipped offsite for disposal. Soil with lead concentrations less than 400 mg/kg is proposed for reuse onsite.

Based on the samples collected by both Credere Associates, Inc. and StoneHill, the greatest concentrations of lead appear to be in the first 6 inches below ground surface (bgs). A limited number of samples were also collected from 12 to 24 inches bgs – all of which had reported lead concentrations below SRS. It is not clear if StoneHill is proposing to conduct the soil excavation in multiple cuts (e.g., 0-1 foot and 1-2 feet) or in a single cut. NHDES is concerned that doing the excavation in a single cut down to 2 feet could result in the soil stockpiles being inappropriately diluted prior to sampling. Please clarify how the excavation work will be sequenced within the greenhouse area.

- The grids shown on Figure 9 do not appear to extend a sufficient distance beyond the limits of the former greenhouses to include all the locations with lead SRS exceedances as shown on Figure 6. Please modify the grid layout on Figure 9 as appropriate.

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Former Boiler and Packing House Building Area

- NHDES concurs with StoneHill that the presence of arsenic at concentrations greater than SRS likely represents a background condition pursuant to Env-Or 602.03. Samples with SRS exceedances were collected from sand, silt and clay soils that are likely native materials while samples collected from coal ash impacted soil had no SRS exceedances for arsenic.
- NHDES does not believe that coal ash can be ruled out as a contributor to the polycyclic aromatic hydrocarbons (PAHs) reported at concentrations greater than SRS based on the available data. It is also probable that the coal clinkers would exhibit PAH concentrations greater than SRS if sampled directly. That said, this does not affect the appropriateness of the remedial action proposed for this area.

Given the above, NHDES requests the implementation of an Activity and Use Restriction pursuant to Env-Or 608 for the ash/clinker consolidation area as shown on Figure 8.

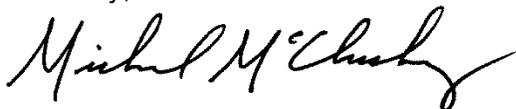
- Any removal of materials from the wetland downgradient of the BPB Area shall be performed in accordance with all applicable federal, state, and local requirements.
- On page 18 of 20 it is indicated that “the westerly embankment of the BPB Area will be covered with a moisture barrier and 2 feet of clean fill...” Should that be a *marker* barrier?
- Any soil containing coal ash that is transported off-site shall be characterized and managed accordingly.
- For clarification, on page 18 of 20, please note that even if the presence of a constituent represents a background condition, that does not necessarily mean it does not pose a risk.

Retention Basin #4 and Wetland H

- Sediment removal from Retention Basin #4 and the filling of Wetland H shall be performed in accordance with all applicable federal, state, and local requirements.

Should you have any questions regarding the comments above, please contact me at NHDES' Waste Management Division.

Sincerely,



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cc: Amy Doherty, P.G., State Sites Supervisor, HWRB
Timothy Stone, P.G., StoneHill Environmental, Inc.
Allen Wyman, StoneHill Environmental, Inc.
Attention Health Officer, Town of Exeter