



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

EMAIL ONLY

July 22, 2021

Matthew Bigley (matthew.bigley@bd.com)
BD, Inc.
1 Becton Drive
Franklin Lakes, NJ 07417

Subject Site: **Fitzwilliam** – Former C.R. Bard Facility, 179 NH Route 12 North
DES Site #198905021, LUST Project #1095

Periodic Summary Report, prepared by Wood Environmental and
Infrastructure, Inc, dated May 12, 2021 (Activity #291308)

Dear Mr. Bigley:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the subject report and other information in our files regarding the petroleum discharge discovered on April 14, 1995 at the referenced site. The report substantially meets the requirements of Groundwater Management Permit (GMP) GWP-198905021-F-004. Based on our review of the existing information, NHDES has the following comments:

1. Your consultant concluded that based on data obtained from the April 2021 monitoring, there has been little change in groundwater quality or light non-aqueous phase liquid (LNAPL) conditions at the site. Exceedances of the ambient groundwater quality standard (AGQS) for naphthalene continue in samples from well T1-B. (Note that Table 6 of the report incorrectly lists the April 12, 2021 sampling as April 15, 2020.) In addition, LNAPL continues to intermittently be observed in wells TDS-2 and FT-1.
2. NH Administrative Rule Env-Or 604.04(a)(4) specifies that Periodic Summary Reports include: *“An evaluation of progress towards meeting performance standards including any recommendations for remedial action revisions.”* The subject report does not include any recommendations for remedial action revisions. The conclusion of your consultant, described in Item #1 above, suggests that additional remedial measures may be required to achieve groundwater and soil quality standards. NHDES has received notification from the current owner of the subject property (Turnkey Lumber, Inc.) that the inactive 10,000-gallon underground heating oil tank (UST), that is located in the area of impacts from the petroleum release discovered on April 14, 1995, is to be removed. This UST removal provides opportunities for BD, Inc to pursue alternative remedial measures to expedite site clean-up.
3. Although not required by the aforementioned permit, NHDES acknowledges the additional effort by your consultant to recover LNAPL from site monitoring wells by changing out absorbent socks in wells during August and December 2020, and removing the socks in March 2021 so that accurate monitoring of LNAPL recharge to wells could be assessed during the April 12, 2021 monitoring event.

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4. In the subject report, your consultant stated that road boxes for three monitoring wells were observed on April 12, 2021 as needing repair. The report also indicated that these road boxes were scheduled to be repaired or replaced. Note that Condition #10 of the above-referenced permit requires that: *"All monitoring wells at the site shall be properly maintained and secured from unauthorized access or surface water infiltration."* Please instruct your consultant to provide documentation of the road box repairs with the next data submittal, which is due in June 2022.
5. NHDES notes that upon acquisition of C.R. Bard, Inc. by BD, Inc., the latter has been designated in our database as the party responsible for corrective actions associated with the petroleum release discovered at the subject property on April 14, 1995.

NHDES records indicate that BD, Inc. is not eligible to receive reimbursement from the New Hampshire Petroleum Reimbursement Fund Program for corrective actions related to the release of petroleum at the subject site discovered on April 14, 1995.

Please do not hesitate to contact me if you have any questions regarding the permit.

Sincerely,



[Thomas R. Fargo, P.G.](#)

Oil Remediation and Compliance Bureau
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cc: Margaret Bastien, P.E., ORCB
Fitzwilliam Health Officer
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Mike Rossi, Turnkey Lumber, Inc. (mike@turnkeylumber.com)

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