

November 8, 2023  
Project No. 1194-694

Margaret Bastien, P.E.  
Petroleum Remediation Section Supervisor  
Oil Remediation & Compliance Bureau  
New Hampshire Department of Environmental Services  
29 Hazen Drive - PO Box 95  
Concord, NH 03302-0095

**Re: KEENE – Kingsbury Acquisition, LLC, 80 Laurel Street  
NHDES Site #199102028, UST Facility #0110849  
Notification of Release**

Dear Ms. Bastien:

Enviro North American Consulting, LLC (ENAC) is submitting the enclosed information to meet the State of New Hampshire Code of Administrative Rules Chapter Env-Or 600, Subpart Env-Or 604.08 – Oil Notification Requirements regarding a release of oil to subsurface soil and groundwater beneath the subject property located at 80 Laurel Street in Keene, NH (the Site). The release was observed during removal of one 12,000-gallon underground storage tank (UST) registered with the New Hampshire Department of Environmental Services (NHDES) as Tank No. 6. Prior to tank closure, the UST Closure Notification was submitted to the NHDES Tank Compliance Division and Oil Remediation and Compliance Bureau on August 16, 2023. The following is a summary of the oil release information, Site photographs are attached.

Env-Or 604.08 – Oil Notification Requirements:

- (a) Person Notifying: Dena Wunsch, Enviro North American Consulting, LLC (ENAC)  
Phone Number: 603-875-8100  
Email: [denawunsch@metrocast.net](mailto:denawunsch@metrocast.net)
- (b) Site Location: 80 Laurel Street, Keene, NH 03431
- (c) Date & Time of Discharge: Apparent historical release discovered 9/27/23
- (d) Type & Amount: Fuel oil, unknown amount
- (e) Responsible Party (RP): Kingsbury Acquisition, LLC – Site owner  
RP Contact: Brian Thibeault, Kingsbury Acquisition  
RP Phone Number: 603-641-8608

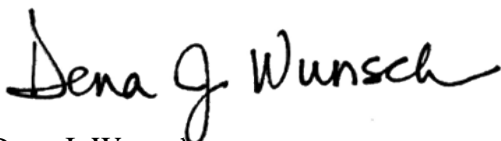
- (f) Potential Receptors: The Site and surrounding properties are serviced by municipal water and sewer utility, Beaver Brook flows across the Site west to south. The Site is vacant and has been abandoned for several years, water meters are turned off.
- (g) Subcontractor: Gaftek and DeFelice Construction conducted tank closure activity with field oversight and reporting by ENAC.  
Subcontractor Phone Number: GAFTECK, 888-485-5731  
Subcontractor Email: Scott Allocca, [sallocca@gaftek.com](mailto:sallocca@gaftek.com)  
Emergency response actions: historical release of PCBs to soil in vicinity, no emergency response planned.
- (h) State agencies notified: NHDES Oil Remediation and Compliance Bureau via this letter notification.
- (i) Cause of Incident/Release: Tank No. 6 was installed in the same vicinity as two (2) 15,000-gallon fuel oil USTs which were removed in 1986; upon removal Tank No. 6 was observed in good condition with no holes or significant rust or corrosion indicative of a past release. The oil release to subsurface soil was observed as gray and black stained soil with a heavy product sheen and odor indicative of an aged, weathered release. The tank's contents appear to be more characteristic of No. 6 fuel oil instead of No. 2 fuel oil which is the registered tank contents.
- (j) Available Reports/Sampling Results: The oil release is based on confirmatory analytical data and visual observation of oil free product impacting subsurface soil and groundwater. Two (2) discrete soil samples were collected from the sidewalls of the excavation at approximately 12-feet below ground surface (bgs) and one grab groundwater sample was collected from the central portion of the excavation following tank removal. Concentrations of total petroleum hydrocarbons (TPH) were detected from the discrete sample identified as T6-DS-1 collected from the excavation sidewall at 13,000-parts per million (ppm) which is above the SRS of 10,000-ppm. The complete analytical report is attached.

ENAC has provided this Oil Notification information on behalf of the Site owner and Responsible Party (RP) Kingsbury Acquisition, LLC. ENAC notes the buried fuel supply piping associated with Tank No. 6 remains at the Site and is being scheduled for removal by Gaftek with oversight by ENAC during November 2023. Following removal of the buried supply piping, a UST Closure Report summarizing the work activity will be submitted to the NHDES ORCB.

The portion of the Site where the oil release was discovered from past leaking USTs (LUSTs) is included within an Activity and Use Restriction (AUR) placed in 1999 due to the presence of polychlorinated biphenyl (PCB) impacts to soil. Soil excavation activity was not conducted during the recent tank closure efforts, disturbed soil was backfilled following tank removal. Please contact our office by email or phone at (603) 875-8100 if you have questions regarding this notification.

Respectfully submitted,

**ENVIRO NORTH AMERICAN CONSULTING, LLC**



Dena J. Wunsch  
Senior Project Geologist



Todd A. Greenwood, P.G.  
President

*Attachment: Site Photographs  
Laboratory Report*

cc: Brian Thibeault, Kingsbury Acquisition, LLC (by email)





Photo 1: Tank No. 6 exposed, view looking east.



Photos 2 & 3: Gray, black stained soil with oil sheen and odor.



Photo 4: Discrete sample of stained soil sample collected for field screening, oil as free product observed in plastic bag.





Photos 5 & 6: Accumulated groundwater at base of Tank No. 6 excavation, product sheen observed on groundwater surface.



# Eastern Analytical, Inc.

*professional laboratory and drilling services*

Todd Greenwood  
Enviro North American Consulting  
PO Box 1075  
Alton, NH 03809



## Laboratory Report for:

Eastern Analytical, Inc. ID: 267360  
Client Identification: KINGSBURY PROPERTY | 1194-694  
Date Received: 9/28/2023

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the written approval of the laboratory.

The following standard abbreviations and conventions apply to all EAI reports:

- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

## Certifications:

Eastern Analytical, Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012), New York (12072) and West Virginia (9910C). Please refer to our website at [www.easternanalytical.com](http://www.easternanalytical.com) for a copy of our certificates and accredited parameters.

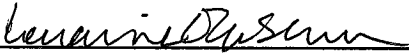
## References:

- EPA 600/4-79-020, 1983
- Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd edition or noted revision year.
- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992
- ASTM International

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

  
Lorraine Olashaw, Lab Director

10.12.23  
Date



## SAMPLE CONDITIONS PAGE

EAI ID#: 267360

Client: **Enviro North American Consulting**

Client Designation: **KINGSBURY PROPERTY | 1194-694**

**Temperature upon receipt (°C): 4.3**

Acceptable temperature range (°C): 0-6

**Received on ice or cold packs (Yes/No): Y**

Lab ID	Sample ID	Date Received	Date/Time Sampled		Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
267360.01	T6-DS-1	9/28/23	9/27/23	13:45	soil	86.4	Adheres to Sample Acceptance Policy
267360.02	T6-DS-2	9/28/23	9/27/23	16:15	soil	85.8	Adheres to Sample Acceptance Policy
267360.03	GW-1	9/28/23	9/27/23	16:50	aqueous		Adheres to Sample Acceptance Policy

*All results contained in this report relate only to the above listed samples.*

*Unless otherwise noted:*

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.



# LABORATORY REPORT

EAI ID#: 267360

Client: **Enviro North American Consulting**

Client Designation: **KINGSBURY PROPERTY | 1194-694**

Sample ID:	T6-DS-1	T6-DS-2	GW-1
Lab Sample ID:	267360.01	267360.02	267360.03
Matrix:	soil	soil	aqueous
Date Sampled:	9/27/23	9/27/23	9/27/23
Date Received:	9/28/23	9/28/23	9/28/23
Units:	mg/kg	mg/kg	ug/L
Date of Analysis:	10/6/23	10/10/23	10/4/23
Analyst:	DGM	DGM	DGM
Method:	8260C	8260C	8260C
Dilution Factor:	8	9	1
Dichlorodifluoromethane	< 0.8	< 0.9	< 2
Chloromethane	< 0.8	< 0.9	< 2
Vinyl chloride	< 0.2	< 0.2	< 1
Bromomethane	< 0.8	< 0.9	< 2
Chloroethane	< 0.8	< 0.9	2.8
Trichlorofluoromethane	< 0.8	< 0.9	< 2
Diethyl Ether	< 0.4	< 0.5	< 2
Acetone	< 20	< 20	< 10
1,1-Dichloroethene	< 0.4	< 0.5	< 0.5
tert-Butyl Alcohol (TBA)	< 20	< 20	< 30
Methylene chloride	< 0.8	< 0.9	< 1
Carbon disulfide	< 0.8	< 0.9	< 2
Methyl-t-butyl ether(MTBE)	< 0.8	< 0.9	< 1
Ethyl-t-butyl ether(ETBE)	< 0.8	< 0.9	< 2
Isopropyl ether(DIPE)	< 0.8	< 0.9	< 2
tert-amyl methyl ether(TAME)	< 0.8	< 0.9	< 2
trans-1,2-Dichloroethene	< 0.4	< 0.5	< 1
1,1-Dichloroethane	< 0.4	< 0.5	12
2,2-Dichloropropane	< 0.4	< 0.5	< 1
cis-1,2-Dichloroethene	< 0.4	< 0.5	3.7
2-Butanone(MEK)	< 4	< 5	< 10
Bromochloromethane	< 0.4	< 0.5	< 1
Tetrahydrofuran(THF)	< 4	< 5	< 10
Chloroform	< 0.4	< 0.5	< 1
1,1,1-Trichloroethane	< 0.4	< 0.5	3.3
Carbon tetrachloride	< 0.4	< 0.5	< 1
1,1-Dichloropropene	< 0.4	< 0.5	< 1
Benzene	< 0.4	< 0.5	< 1
1,2-Dichloroethane	< 0.4	< 0.5	< 1
Trichloroethene	< 0.4	< 0.5	1.4
1,2-Dichloropropane	< 0.4	< 0.5	< 1
Dibromomethane	< 0.4	< 0.5	< 1
Bromodichloromethane	< 0.4	< 0.5	< 0.5
1,4-Dioxane	< 8	< 9	< 50
4-Methyl-2-pentanone(MIBK)	< 4	< 5	< 10
cis-1,3-Dichloropropene	< 0.4	< 0.5	< 0.5
Toluene	< 0.4	< 0.5	< 1
trans-1,3-Dichloropropene	< 0.4	< 0.5	< 0.5
1,1,2-Trichloroethane	< 0.4	< 0.5	< 1
2-Hexanone	< 0.8	< 0.9	< 10
Tetrachloroethene	< 0.4	< 0.5	< 1
1,3-Dichloropropane	< 0.4	< 0.5	< 1
Dibromochloromethane	< 0.4	< 0.5	< 1
1,2-Dibromoethane(EDB)	< 0.2	< 0.2	< 0.5
Chlorobenzene	< 0.4	< 0.5	< 1
1,1,1,2-Tetrachloroethane	< 0.4	< 0.5	< 1





# LABORATORY REPORT

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Sample ID:	T6-DS-1	T6-DS-2	GW-1
Lab Sample ID:	267360.01	267360.02	267360.03
Matrix:	soil	soil	aqueous
Date Sampled:	9/27/23	9/27/23	9/27/23
Date Received:	9/28/23	9/28/23	9/28/23
Units:	mg/kg	mg/kg	ug/L
Date of Analysis:	10/6/23	10/10/23	10/4/23
Analyst:	DGM	DGM	DGM
Method:	8260C	8260C	8260C
Dilution Factor:	8	9	1
Ethylbenzene	< 0.4	< 0.5	< 1
mp-Xylene	< 0.4	< 0.5	< 1
o-Xylene	< 0.4	< 0.5	< 1
Styrene	< 0.4	< 0.5	< 1
Bromoform	< 0.4	< 0.5	< 2
IsoPropylbenzene	< 0.4	< 0.5	< 1
Bromobenzene	< 0.4	< 0.5	< 1
1,1,2,2-Tetrachloroethane	< 0.4	< 0.5	< 1
1,2,3-Trichloropropane	< 0.4	< 0.5	< 0.5
n-Propylbenzene	<b>0.64</b>	<b>0.57</b>	< 1
2-Chlorotoluene	< 0.4	< 0.5	< 1
4-Chlorotoluene	< 0.4	< 0.5	< 1
1,3,5-Trimethylbenzene	< 0.4	< 0.5	< 1
tert-Butylbenzene	< 0.4	< 0.5	< 1
1,2,4-Trimethylbenzene	<b>5.6</b>	<b>6.1</b>	<b>10</b>
sec-Butylbenzene	< 0.4	< 0.5	< 1
1,3-Dichlorobenzene	< 0.4	< 0.5	< 1
p-Isopropyltoluene	<b>0.55</b>	< 0.5	< 1
1,4-Dichlorobenzene	< 0.4	< 0.5	< 1
1,2-Dichlorobenzene	< 0.4	< 0.5	< 1
n-Butylbenzene	<b>1.1</b>	<b>1.2</b>	< 1
1,2-Dibromo-3-chloropropane	< 0.4	< 0.5	< 2
1,3,5-Trichlorobenzene	< 0.4	< 0.5	< 1
1,2,4-Trichlorobenzene	< 0.4	< 0.5	< 1
Hexachlorobutadiene	< 0.4	< 0.5	< 0.5
Naphthalene	<b>25</b>	<b>22</b>	<b>39</b>
1,2,3-Trichlorobenzene	< 0.4	< 0.5	< 0.5
4-Bromofluorobenzene (surr)	<b>101 %R</b>	<b>100 %R</b>	<b>98 %R</b>
1,2-Dichlorobenzene-d4 (surr)	<b>101 %R</b>	<b>102 %R</b>	<b>103 %R</b>
Toluene-d8 (surr)	<b>98 %R</b>	<b>95 %R</b>	<b>99 %R</b>
1,2-Dichloroethane-d4 (surr)	<b>98 %R</b>	<b>101 %R</b>	<b>98 %R</b>

T6-DS-1, T6-DS-2: A dilution was required due to sample matrix.



# LABORATORY REPORT

EAI ID#: 267360

Client: **Enviro North American Consulting**

Client Designation: **KINGSBURY PROPERTY | 1194-694**

Sample ID:	T6-DS-1	T6-DS-2	GW-1
Lab Sample ID:	267360.01	267360.02	267360.03
Matrix:	soil	soil	aqueous
Date Sampled:	9/27/23	9/27/23	9/27/23
Date Received:	9/28/23	9/28/23	9/28/23
Units:	mg/kg	mg/kg	ug/L
Date of Extraction/Prep:	10/2/23	10/2/23	10/4/23
Date of Analysis:	10/5/23	10/5/23	10/4/23
Analyst:	JMR	JMR	JMR
Method:	8270E	8270E	8270E
Dilution Factor:	80	79	1
Naphthalene	17	19	7.0
2-Methylnaphthalene	54	67	2.8
1-Methylnaphthalene	32	36	4.0
Acenaphthylene	< 6	< 6	< 0.1
Acenaphthene	< 6	< 6	0.21
Fluorene	9.8	8.8	< 0.1
Phenanthrene	52	43	< 0.1
Anthracene	< 6	< 6	< 0.1
Fluoranthene	< 6	< 6	< 0.1
Pyrene	6.9	< 6	< 0.1
Benzo[a]anthracene	< 6	< 6	< 0.1
Chrysene	< 6	< 6	< 0.1
Benzo[b]fluoranthene	< 6	< 6	< 0.1
Benzo[k]fluoranthene	< 6	< 6	< 0.1
Benzo[a]pyrene	< 6	< 6	< 0.1
Indeno[1,2,3-cd]pyrene	< 6	< 6	< 0.1
Dibenz[a,h]anthracene	< 6	< 6	< 0.1
Benzo[g,h,i]perylene	< 6	< 6	< 0.1
p-Terphenyl-D14 (surr)	80 %R	87 %R	59 %R

T6-DS-1, T6-DS-2: Detection limits elevated due to higher than normal final extract volume and the lower initial mass used for analysis.



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Sample ID:	T6-DS-1	T6-DS-2
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Lab Sample ID:	267360.01	267360.02
Matrix:	soil	soil
Date Sampled:	9/27/23	9/27/23
Date Received:	9/28/23	9/28/23
Units:	mg/kg	mg/kg
Date of Extraction/Prep:	10/2/23	10/2/23
Date of Analysis:	10/5/23	10/5/23
Analyst:	JMR	JMR
Method:	8015CDRO	8015CDRO
Dilution Factor:	80	79
DRO (Diesel Range C10-C28)	<b>13000</b>	<b>9800</b>
p-Terphenyl-D14 (surr)	<b>75 %R</b>	<b>85 %R</b>



(WHITE: Lab Copy      GREEN: Customer Copy)