



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

August 2, 2018

Christopher S. Angier
Senior Environmental Project Manager
Saint-Gobain Performance Plastics
14 McCaffrey Street
Hoosick Falls, NY 12090

Subject: Merrimack – Saint-Gobain Performance Plastics, 701 Daniel Webster Highway
DES Site #199712055, Project #36430

Work Plan for Produce Garden Soil Sampling, prepared by Golder Associates Inc,
dated April 6, 2018

Dear Mr. Angier:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the above-referenced submittal prepared on behalf of Saint-Gobain Performance Plastics (Saint-Gobain) by Golder Associates, Inc. (Golder) for the Saint-Gobain facility (Facility) located at 701 Daniel Webster Highway in Merrimack. The work plan was submitted in response to NHDES' letter dated November 3, 2017 requesting testing of soil for per- and polyfluoroalkyl substances (PFAS) in garden areas on residential properties located in close proximity to the Facility.

NHDES approves the work plan, with the following comments:

- Based on observations by NHDES of residential properties in the vicinity of the Facility in April and May 2018, the properties listed below appear to have current or former produce gardens and should be included on the list for sampling. Owners of these properties, as well as those properties identified in the work plan, should be contacted to confirm NHDES' observations. Sampling at additional locations may be warranted pending a review of the results from this sampling effort.
 - 704 Daniel Webster Highway
 - 664 Daniel Webster Highway
 - 656 Daniel Webster Highway
 - 4 Lantern Lane
 - 22 Lantern Lane
- Given the detections of 24 PFAS in different media from the various investigations completed to date around the Facility, and the potential for the presence of precursor compounds that may break down into perfluorooctanoic acid (PFOA) or perfluorooctane sulfonic acid (PFOS), NHDES strongly recommends that samples be submitted for analysis of a longer list of PFAS analytes than the list specified in the work plan. NHDES understands that many commercial laboratories with PFAS capabilities currently report between 20 to 30 PFAS, and recommends that samples be analyzed for this expanded list. These data will help delineate the impacts from the release of PFAS from the Facility.
- Analytical results from this sampling effort should be compared to NHDES' risk-based direct contact screening values for PFOA and for PFOS of 500 micrograms per kilogram ($\mu\text{g}/\text{kg}$). While we understand that a risk assessment for the home garden scenario will not be conducted as part of this phase of work, as more information becomes available, it may be necessary to evaluate the data in this context in the future. The intent of the sampling

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program should be communicated to the property owners so that they have clear expectations of how the data will be used at this time.

- The description provided in the work plan was unclear as to what information would be provided to the property owners and NHDES following receipt of the sample results. At a minimum, the initial data transmittals for each property should include a table summarizing the analytical results, a figure showing the sampling locations, and a copy of the laboratory report(s). NHDES also requests that a comprehensive summary data report be submitted that includes a discussion of the results, including:
 - PFAS detected, including the frequency of detections for each PFAS and the range of concentrations detected;
 - Total Oxidizable Precursor (TOP) assay results and significance with respect to potential precursor compounds; and
 - Any conclusions regarding other anthropogenic impacts with supporting analysis.

Copies of the summary report should also be provided to the individual property owners.

- Please upload the validated analytical results to NHDES' Environmental Monitoring Database (EMD).
- Data from this sampling effort should be evaluated in the context of the overall conceptual site model as it relates to the future site investigation that will be completed in the areas around the Facility.

NHDES encourages consideration of steps to compress the schedule to the extent possible. NHDES appreciates work completed to date by Saint-Gobain related to the ongoing site investigation activities. Should you have questions regarding this letter, please contact me at NHDES' Waste Management Division.

Sincerely,



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