

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

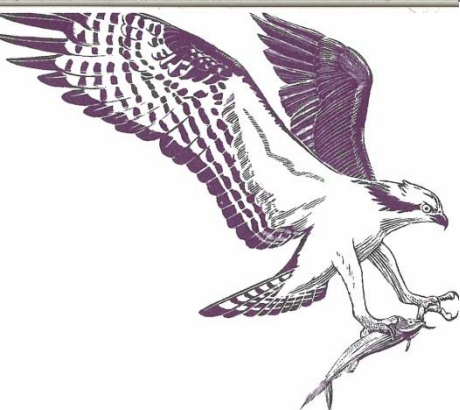
**REPONSE TO NHDES COMMENTS ON RAP
Former Dagostino Rose Farm
Oak Street Extension
Exeter, NH**

**NHDES Site # 201203003
Project # 27859**

**Prepared for:
Exeter Rose Farm, LLC
953 Islington Street, Suite 23D
Portsmouth, NH 03801
Contact: Todd Baker
603-425-8598**

**Prepared By:
StoneHill Environmental, Inc.
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Contact: Timothy Stone
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603-433-1935**

**Date of Letter: August 30, 2018
StoneHill Project No. 15046**



StoneHill

Environmental

A Subsidiary of CEA

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Portsmouth, NH 03801
tel 603-433-1935 fax 603-433-1942

August 30, 2018

Project No. 15046

Michael McCluskey, P.E.
NH Department of Environmental Services
Hazardous Waste Remediation Bureau
PO Box 95
Concord, NH 03302-0095

RE: Response to Comments
Supplemental Site Investigation and Remedial Action Plan,
Former Dagostino Rose Farm, Oak Street Extension
DES Site #201203003, Project #27859

Dear Mr. McCluskey;

StoneHill Environmental (StoneHill) has reviewed the New Hampshire Department of Environmental Services (NHDES) letter dated July 17, 2018, written by you in response to the “*Supplemental Site Investigation and Remedial Action Plan*,” prepared by StoneHill dated December 21, 2017. The following is StoneHill’s response to the comments presented in your letter:

Former Greenhouse Area

NHDES Comment:

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.

- Response: NHDES notes that the majority of the lead contamination appears to be within six inches of grade. Given this, the NHDES is concerned that by removing the upper two feet of overburden in one cut or one foot layers, the most heavily impacted soils found in the upper six inches would be diluted by the deeper soils with lesser concentrations of lead as soil is staged in piles. The concern is that due to this mixing, the waste characterization sampling of the piles would indicate that the lead concentrations in the staged soil piles would be less than the soil remediation standard (SRS) of 400 milligrams per kilogram (mg/kg) and the piles would not be transported off site for proper disposal. StoneHill understands this concern and intends to make every attempt to only initially remove and stage the top 6-inches of soil while focusing on areas known to contain lead concentrations in exceedance of the SRS. Indeed, the overall objective of the soil removal is to remove soils exceeding the lead SRS and minimize the removal of soil not exceeding the SRS to reduce the volume of soil requiring off-site disposal. Since it is anticipated the presence of buried debris throughout the former greenhouse area will likely complicate the simple removal of only the top 6-inches of impacted soil, the identification of soil volumes intended for off-site disposal will also be driven by the previously completed extensive pre-characterization soil analyses, as well as, field x-ray fluorescence (XRF) lead measurements to be conducted during the course of soil removal activities. In conclusion, soil from areas previously identified as containing lead concentrations above SRS and from areas with soil identified as containing lead concentrations above SRS based on XRF screening during the proposed excavation, will be stockpiled and designated for off-site disposal, regardless of waste characterization sampling results.

NHDES Comment:

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.

- Response: The NHDES noted that the remedial target area depicted on Figure 9 for the removal of lead contaminated soil did not encompass all the sample locations where elevated concentrations of lead in soil were shown on Figure 6. The intent of the Remedial Action Plan (RAP) is to remove lead contaminated soils in excess of the SRS, including locations of elevated lead contaminated soils noted outside of the immediate footprint of the former greenhouses. A revised Figure 9 with extended grid boundaries has been prepared and is attached.

Former Boiler Packing House Building Area

NHDES Comment:

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.

- Response: None required.

NHDES Comment:

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.

- Response: StoneHill concurs with NHDES that the origins of potential concentrations of PAH SRS exceedances does not affect the remedial action proposed for this area. As noted in the RAP it is planned that an Activity and Use Restriction (AUR) will be implemented in this area.

NHDES Comment:

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.

- Response: The removal of materials from the wetland in the Former Boiler Packing House Building Area will be done in accordance with applicable federal, state, and local requirements. Rose Farm LLC has retained the services of a New Hampshire Certified Wetland Scientist to oversee regulatory issues associated with wetlands on the site.

NHDES Comment:

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?

- Response: StoneHill proposes that a marker layer/barrier be placed over the AUR area. The reference to moisture barrier was a typographic error.

NHDES Comment: *Any soil containing coal ash that is transported off-site shall be characterized and managed accordingly.*

- Response: StoneHill concurs with the NHDES comment. Soil containing apparent coal ash that is designated for off-site disposal will be adequately characterized and disposed of at an appropriate location.

NHDES Comment: 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.

- Response: StoneHill understands that the presence of a constituent of concern that represents a background condition may pose a risk, and if so, appropriate risk reduction measures will be implemented to minimized environmental exposure.

Retention Basin #4 and Wetland H

NHDES Comment:

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.

- Response: Any materials removed from wetlands in Retention Basin #4, and filling/grading of Wetland H, will be done in accordance with applicable federal, state, and local requirements. As indicated above, Rose Farm LLC has retained the services of a New Hampshire Certified Wetland Scientist to oversee regulatory issues associated with wetlands and water bodies on the site.

We trust the above responses address your comments regarding the RAP and if not, please contact either of the undersigned if you require any additional clarification or have any questions. As this project is currently proceeding through the Exeter Planning Board process, on behalf of Rose Farm, LLC, we request NHDES approval of the RAP at your earliest convenience.

Sincerely,

StoneHill Environmental, Inc.

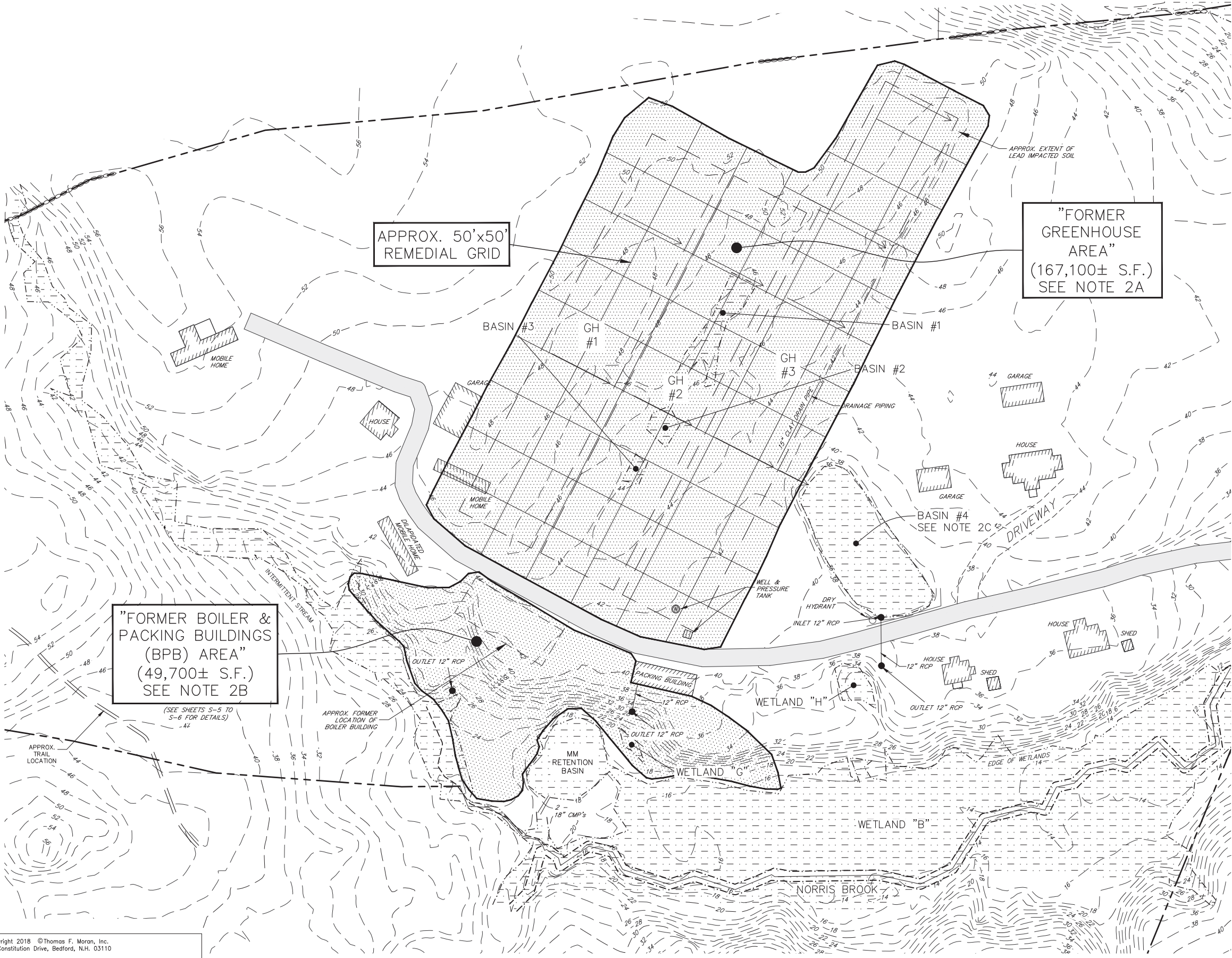


Timothy Stone, PG
Principal



Allen Wyman
Project Manager

Enclosure: Figure 9 – Remediation Areas



ENVIRONMENTAL NOTES:

- THIS SITE IS NHDES SITE #201203003 AND IS KNOWN AS THE "FORMER DAGOSTINO ROSE FARM" IN EXETER NH.
- REMEDIAL ACTION PLAN:
 - A: FORMER GREENHOUSE AREA – SHALLOW SOIL CONTAINING LEAD CONCENTRATIONS EXCEEDING THE NHDES STANDARD APPLICABLE TO RESIDENTIAL PROPERTIES WILL BE REMOVED AND PROPERLY DISPOSED AT AN OFF-SITE DISPOSAL FACILITY.
 - B: FORMER BOILER & PACKING BUILDING AREA – SOLID WASTES WILL BE IDENTIFIED, REMOVED AND PROPERLY DISPOSED OF. CONCRETE AND BRICK REMOVED FROM THE SOLID WASTE AREA MAY BE CRUSHED AND USED AS ROAD BASE. COAL ASH/CLINKER WILL BE CONSOLIDATED IN THE FORMER PACKING HOUSE AREA, CAPPED AND COVERED.
 - C: MANMADE RETENTION BASIN #4 – SEDIMENTS CONTAINING LEAD CONCENTRATIONS EXCEEDING THE NHDES ECOLOGICAL STANDARDS WILL BE REMOVED AND PROPERLY DISPOSED OF AT AN OFF-SITE LOCATION.
- DESCRIPTIONS:
 - BASIN #1 – MANMADE RETENTION BASIN – 2,633± S.F. TO BE FILLED AS A RESULT OF THE REMEDIATION PROCESS.
 - BASIN #2 – MANMADE RETENTION BASIN – 761± S.F. TO BE FILLED AS A RESULT OF THE REMEDIATION PROCESS.
 - BASIN #3 – MANMADE RETENTION BASIN – 392± S.F. TO BE FILLED AS A RESULT OF THE REMEDIATION PROCESS.
 - BASIN #4 – MANMADE RETENTION BASIN – 10,206± S.F. TO BE REMEDIATED AND RESTORED IN PLACE.
 - WETLAND "G" – MANMADE WETLAND – 276± S.F. TO BE FILLED AS A RESULT OF THE REMEDIATION PROCESS.

(SEE SHEET S-1 FOR SURVEY NOTES AND SHEETS S-2 TO S-6 FOR DETAILS)

LEGEND:

CMP	CORRUGATED METAL PIPE
RCP	REINFORCED CONCRETE PIPE
MM	MANMADE
S.F.	SQUARE FEET
GH	GREENHOUSE
---	STONE WALL
---	BROOK
---	PERENNIAL STREAM
---	INTERMITTENT STREAM
---	EDGE OF WETLANDS AND SURFACE WATER
---	PROPERTY BOUNDARY
---	EXISTING PAVEMENT
---	FORMER GREENHOUSE/BOILER & PACKING BUILDINGS AREA
---	WETLANDS

REV.	DATE	DESCRIPTION
1	08/29/18	REVISED PER NHDES COMMENTS

TAX MAP 54 LOTS 5, 6 & 7

REMEDATION AREAS

"FORMER DAGOSTINO ROSE FARM"

STREET EXTENSION

EXETER, NEW HAMPSHIRE, COUNTY OF ROCKINGHAM

OWNED BY

EXETER ROSE FARM, LLC

PREPARED FOR

EXETER ROSE FARM, LLC

SCALE: 1"=50' **OCTOBER 23, 2017**

Civil Engineers
Structural Engineers
Traffic Engineers
Land Surveyors
Landscape Architects
Scientists

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