

**TOWN OF WALPOLE**  
New Hampshire  
**OFFICE OF THE SELECTBOARD**

**NARRATIVE INFORMATION SHEET - FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS, RFP No. EPA-OLEM-OBLR-18-07**

**1. APPLICANT IDENTIFICATION**

Town of Walpole  
Selectboard  
PO Box 729  
Walpole, NH 03608

**2. FUNDING REQUESTED**

2.a. Grant Type

The Grant is being sought for Single Site Clean-up. The Site is comprised of two small contiguous lots with common land use, ownership, and contaminant sources.

2.b. Federal Funds Requested

- i. \$500,000
- ii. We are requesting a cost share waiver.

2.c. Contamination

Contamination is Hazardous Substances.

**3. LOCATION**

Town of Walpole, Cheshire County, New Hampshire

**4. PROPERTY INFORMATION**

Central Plating Site (Lot 65 and 66 on Map 20)  
12 Westminster Street  
Walpole, NH 03608

**5. CONTACTS**

5.a. Project Director *and* Highest-Ranking Elected Official

Peggy Pschirrer  
Selectboard Chair  
Town of Walpole, NH  
PO Box 729  
34 Elm Street  
Walpole, NH 03608  
Phone: 603-756-3672  
e-mail: ppschirrer@walpolenh.us

**6. POPULATION**

Population: Town population – approximately 3,809 (Ref: 2017 American Community Survey 5 Year Estimate)

PO Box 729 • 34 Elm Street • Walpole, NH 03608

Phone: 603-756-3672 • Fax: 603-756-9209

www.walpolenh.us

## 7. OTHER FACTORS CHECKLIST

The following Other Factors apply to our community and the proposed project:

Other Factor	Page #
Community population is 10,000 or less.	Pg. 1; Section 1.a.i
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	Pg. 3; Section 1.c.ii
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	Pgs. 2 & 3; Section 1.b.ii

## 8. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY

Our letter from State officials is provided as the attachment to this letter.



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Robert R. Scott, Commissioner**

EMAIL ONLY

January 7, 2019

Peggy Pschirrer, Selectboard Chair  
Town of Walpole  
PO Box 729  
Walpole, NH 03608

**Subject: Town of Walpole  
FY19 Proposal for EPA Brownfields Cleanup Grant  
Central Plating Site, Walpole, New Hampshire  
State Letter of Acknowledgement and Support**

Dear Ms. Pschirrer:

The New Hampshire Department of Environmental Services (NHDES) hereby acknowledges and expresses our support for the Town of Walpole's proposal for an EPA Brownfields Cleanup Grant for the Central Plating Site located at 12 Westminster Street in Walpole, New Hampshire. It is NHDES' understanding that the Town of Walpole is applying for \$500,000 in hazardous substances cleanup funds.

Should your proposal be successful, NHDES will commit to providing a liaison to provide technical support, facilitate the process of reviewing and approving all cleanup related submittals to NHDES, and participate in any community outreach efforts.

We look forward to working with the Town of Walpole on this important project. Please contact me should you have any questions.

Sincerely,

Michael McCluskey, P.E.  
Brownfields Program  
Hazardous Waste Remediation Bureau  
Tel: (603) 271-2183  
Fax: (603) 271-2181  
Email: [Michael.McCluskey@des.nh.gov](mailto:Michael.McCluskey@des.nh.gov)

ec: Karlee Kenison, P.G., Administrator, NHDES-HWRB  
Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB

[www.des.nh.gov](http://www.des.nh.gov)

PO Box 95, 29 Hazen Drive, Concord, NH 03302-0095  
Telephone: (603) 271-2908 Fax: (603) 271-2181 TDD Access: Relay NH 1-800-735-2964

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (30 PTS)**

### **1.a Target Area and Brownfields (8 points)**

#### **1.a.i Background and Description of Target Area (3 points):**

The Town of Walpole, NH, population 3,809<sup>1</sup>, historically flourished as an agricultural community on the rich soils of the Connecticut River, but changes to the global economy have diminished farming jobs transforming the economy from goods producing to service-providing (mostly retail)<sup>2</sup>. With the exception of three distinct village areas (including Walpole Center, the target area of this proposal) the town is mostly rural (only 7.5% of the land cover is developed), with only 108.5 people per square mile.<sup>3</sup> Walpole Center, population 499<sup>1</sup>, hosts a mix of housing, commercial, office and municipal land uses and the subject brownfield site, the former Central Plating site, is the only industrial land use in the target area. Walpole Center is the oldest place in Cheshire County (median age is 59.6)<sup>1</sup> and is the epitome of what NH Center for Public Policy has called “the silver tsunami”: the increasing trend of an aging population coupled with young people leaving the State for more economic opportunities. Walpole Center is economically vulnerable, given its disproportionate number of retirees (42.8%)<sup>4</sup>, their extremely low mean retirement income (only \$13,229), and the loss of young workers in the area.<sup>5</sup>

#### **1.a.ii Description of the Brownfield Site(s) (5 points):**

A thriving plating facility from 1963 through 2006, the former Central Plating Site is tucked in the center of the village, adjacent to residential apartments, a restaurant, offices, a bank, and a mini mart. The Site occupies a total of 0.28 acres on two adjoining lots. Only a former wastewater pre-treatment building containing hazardous building materials remains on site. The plating building was demolished in 2012 and in its place is a sparsely vegetated dirt footprint. Surficial and deeper soils contain high concentrations of hexavalent chromium (a carcinogen) and trivalent chromium, well above regulatory standards and at hazardous waste concentrations.

These soils comprise a mass of 555± tons and the impacts extend into the groundwater above a clay aquitard, as much as 17 ft below grade. In addition, there is another estimated 215± tons of soil beneath wastewater sumps in the remaining building. Impacts to groundwater from these source areas exceed state and federal standards for chromium, nickel, cadmium, and arsenic. In addition, discharges of plating bath fume suppressants and Teflon (used as a metal coating) led to groundwater impacts of per- and polyfluoroalkyl substances (PFAS) well above state standards for this emerging class of contaminants which are also identified as possible carcinogens.

Impacted soils are a literal hop-skip-and-jump from the apartments and the central village parking lot abuts the most severely impacted soils. Although the Town has municipal water, the Central Plating Site is surrounded by surface water pathways to the nearby Connecticut River including storm sewer infrastructure (catch basins) and an open water brook (Mad Brook).

### **1.b Revitalization of the Target Area (12 points)**

#### **1.b.i Redevelopment Strategy and Alignment with Revitalization Plans (7 points):**

Walpole Center’s experience with the silver tsunami effect,<sup>6</sup> the increasing pressure placed on its legacy farmlands (it has shrunk from 33 to 3 farms since World War II), and a stagnating

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<sup>1</sup> 2013-2017 American Community Survey 5 Year Estimates, Table S0101

<sup>2</sup> Economic and Labor Market Information Bureau, NH Employment Security, 1990-2017

<sup>3</sup> United States Geological Survey National Land Cover Database, 2011.

<sup>4</sup> 2013-2017 American Community Survey 5 Year Estimates, Table DP03

<sup>5</sup> Between 2010 & 2017, Walpole Center’s 18-64 population *decreased* 26%, but its 65+ population *increased* 79% (Source: 2006-2010 & 2013-2017 American Community Survey 5 Year Estimates, Table S0101)

<sup>6</sup> Its labor force shrank 68.3% to 57.2% in only 7 years due to retirements and the outflow of young workers (Source: 2006-2010 & 2013-2017 American Community Survey 5 Year Estimates, Table S2301)

economy (it is located in the only NH county that has lost jobs since the national recovery from the Great Recession<sup>7</sup>), are all challenges that the Town recognizes it must face head-on. Recent economic activity, which has amounted to development proposals for “dollar stores,” chain gas stations, and other low paying retail jobs on former prime agricultural land, are not in keeping with Walpole’s vision of itself. Walpole’s revitalization strategy is simple: to focus on revitalizing its village areas, while preserving its rich, heritage farmland.

To achieve its revitalization vision, the Town of Walpole and other stakeholders continue to use zoning, land purchases and conservation easements to preserve its farmland and green spaces. The strategy for increasing vitality in its village areas has required more creative approaches. Improving walkability by reallocating road space between walkers, bicyclists and motorists is one of Walpole’s strategies to foster village vibrancy and economic activity.<sup>8</sup> Parking has become another important objective. Village centers are dense places with small lots designed in the 18<sup>th</sup> century, before the automobile. The lack of off-street parking has created a development conundrum for the 21<sup>st</sup> century. Parking need is a reality in this century as transit service is anemic in NH<sup>9</sup>, and the haphazard, illegal “on-street” parking that shops and offices rely on for employees and customers works against the “walkability” goals Walpole has for its village areas.

Therefore, the redevelopment of the Central Plating Site into off-street, in-fill parking aligns perfectly with our revitalization strategy, which supports in-town employers with needed employee and shopper parking. The parking will add as much as 40 spaces to the adjoining lot (a 50% increase) and reduce “on-street” parking in the Center that creates disorder and safety issues for walkers, bicyclists and motorists. The added parking provides easy access to nearby commercial and civic buildings, allowing for Walpole to better support its Center. Further, the redevelopment plan includes the creation of a small pocket park with benches and plantings at the south end of the Site and installation of the town’s first public E-vehicle charging stations, an amenity targeting the needs of the aging population and welcoming young families.

**1.b.ii Outcomes and Benefits of Redevelopment Strategy (5 points):**

The Central Plating Brownfield redevelopment plan has the following outcomes: (1) enhance access to and the sustainability of town services and businesses; (2) help redirect development pressures from Walpole’s farmland into infill property where infrastructure (roads and water) is already in place; (3) support Walpole’s existing senior population and attract new families looking to live and work in walkable places; (4) promote environmental stewardship with the development of a pocket park and the development of the town’s first public E-vehicle charging station; and (5) increase property values that will pay for the maintenance of the Center.

The additional parking accommodates 40 village employees or 300 commerce visits per day and will grow business activity and support village viability by retaining existing and attracting new businesses. The proximity of the parking facility to the Center ensures access to medical, commercial, and municipal resources takes pressure off on-street parking and allows for the addition of designated disability parking spaces and more walkable streets. The parking also allows the village to compete with strip development where free parking is plentiful, but development patterns are eroding Walpole’s farmland and undermining Walpole’s efforts to maintain economically vibrant village areas.

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<sup>7</sup> <https://www.dailyyonder.com/job-growth-falters-in-rural-counties/2018/10/23/28169/>

<sup>8</sup> Walpole, NH was one of the first NH communities to adopt a Complete Streets Policy in 2017.

<sup>9</sup> New Hampshire does not currently invest state monies in transit (Source: NH Department of Transportation)

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The plan's inclusion of a pocket park nestled amongst village buildings under the canopy of a mature maple tree will add much-needed green space to the village to relax and congregate, and creates a ride-service meeting place at the heart of the village for those that cannot drive.

In addition to the environmental benefits of reduced travel by meeting needs locally within the Center, the installation of the only electric car charging stations in the area will encourage sustainable life choices (E-vehicle use) that save energy and reduce airborne pollution.

Finally, the plan removes an abandoned building with deteriorating lead paint, mitigates human health risks associated with soils scarred and toxic from past industrial activity, thereby increasing property values, leading to increased tax revenues and reinvestment in the town.

**1.c Strategy for Leveraging Resources (10 points)**

**1.c.i Resources Needed for Site Reuse (7 points):**

Central Plating remediation will require an estimated \$730,000. If awarded, the United States Environmental Protection Agency (US EPA) Brownfields Cleanup Grant of \$500,000 will leave a shortfall of \$230,000 for remediation, plus the longer-term continuing obligation costs (such as the long-term monitoring of compounds recalcitrant to degradation), estimated as \$100,000 over a 15-year period.

In anticipation of acquiring the property to meet critical village infrastructure needs and achieve health risk hazard mitigation, the Town applied for a cleanup grant from the New Hampshire Department of Environmental Services (NH DES) revolving loan fund. The grant was awarded in the amount of \$100,000 to be used for soil transportation and disposal costs contingent upon award and primary use of US EPA Cleanup funds.

The Town acquired the Site on January 3, 2019, with the intent of seeking and securing US EPA funds. As part of property acquisition the Town successfully negotiated for and secured a \$175,000 environmental escrow from the estate of the deceased former property owner to assist with clean-up and continuing environmental obligations. Approximately \$145,000 of the escrow is accounted for as leveraged funds, and about \$30,000 will apply toward the match.

The following funding source documentation is included as an attachment to the proposal:

- January 3, 2019 deed: \$175,000 escrow, \$145,000 earmarked as leveraged funds; and
- January 8, 2019 NH DES Commitment Letter: \$100,000 leveraged funds contingent on US EPA Brownfields Cleanup Grant award.

The availability of these leveraged funds makes Site remediation possible and preserves the Town's limited available resources to support redevelopment costs. Not shown above are the resources already leveraged by committed stakeholders to advance the Site through environmental assessment and remedial planning: \$70,000 Walpole Foundation; \$73,998 Southwest Region Planning Commission US EPA Assessment funds; \$8,109 NH DES.

**1.c.ii Use of Existing Infrastructure (3 points):**

The Central Plating Site abuts the current parking lot which has access from three drive ways: two are off Main Street and one enters from Westminster Street. A classic infill project that is an appropriate use for an otherwise landlocked brownfield, these small parcels add significantly to the existing parking infrastructure<sup>10</sup> and opens up Walpole Center's streets to create a more

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<sup>10</sup> According to 2015 Census figures, 316 or 26% of all employees working in the Town of Walpole work in Walpole Center; this parking will support the workforce growth.

walkable environment. Electrical service is already available at the property for the planned Level 2 EVSE 240 or 208-Volt electric car charging stations for employee or patron vehicles.

From a broader perspective, supporting the village, which in and of itself is existing infrastructure (water, sewer, electric, function buildings, sidewalks), the project decreases pressure on greenfield development. The planned pocket park enhances village infrastructure by making a needed space to rendezvous for drop-offs/pickups, or rest.<sup>11</sup>

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (20 POINTS)**

### **2.a Community Need (12 points)**

#### **2.a.i The Community's Need for Funding (3 points):**

With no sales or income tax, NH is far more reliant on property taxes than most other states to meet a variety of needs. Unfortunately, Walpole Center's property taxpayers are disproportionately older (median age is 59.6), no longer working (42.8% retired), and surviving on extremely low retirement incomes (\$13,229 per year).<sup>12</sup> What's more, the Town is facing a number of looming infrastructure project needs including a large sewer system upgrade and dam project to hold back water on the hillside above Walpole Center. In addition to an overreliance on property taxes, the cost of services and infrastructure are increasingly being downshifted from the State to local municipalities, putting even greater pressure on local property taxes. For example, in 2010, the state eliminated the \$25 million shared revenue program, which used to divide money among NH cities and towns. County taxes have increased 17% this past year and education costs continue to go up every year although our school population continues to drop as the Town and the State age. As such, the Cleanup of Central Plating, which has the immediate cost of \$730,000 (and estimated continuing environmental obligation costs of \$100,000 over 15 years) is a significant cost that Walpole would not be able to address without financial support.

#### **2.a.ii Threats to Sensitive Populations (9 points):**

##### **(1) Health or Welfare (3 points)**

Walpole Center is a high risk community. As stated previously it is the oldest community in Cheshire County (median age 59.6), much higher than the median ages of NH (42.7) or the US (37.8).<sup>11</sup> Seniors are higher risk for COPD, emphysema, and chronic arthritis, osteoporosis, dementia, and kidney disease. While these conditions can be brought on by age, they can also be greatly exacerbated by environmental exposures. The Center is serviced by municipal water, yet critical exposure pathways do exist: (1) inhalation of dust as winds mobilize fine grained soils from the sparsely vegetated former plating building footprint, and (2) incidental ingestion due to the presence of exposed soils.

The abandoned Site building, shrouded in alligating lead paint, and impaired earth left in the plating building footprint invite vandalism and inflict blight upon nearby affordable apartments and surrounding village and is a disincentive to investment. US EPA grant funds make redevelopment possible by leveraging contingent funds which collectively pay for remediation.

##### **(2) Greater Than Normal Incidence of Disease, Adverse Health Conditions (3 pts)**

Central Plating surface soils contain chromium and PFAS. Exposures can increase the risk of cancer and can cause respiratory irritation, asthma and chronic bronchitis: the very diseases that most effect Walpole's seniors. The presence of brownfields and other cumulative environmental issues can affect public health by increasing the risk of cancer, birth abnormalities, asthma, and lead poisoning. County level data shows that the target area already has higher incidences of

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<sup>11</sup> Resting areas are a key infrastructure piece for Walpole's aging population in Walpole's Complete Streets policy.

<sup>12</sup> 2013-2017 American Community Survey 5 Year Estimates, Tables S0101 and DP03.

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several cancers including leukemia, myeloma, non-Hodgkin Lymphoma, ovary, stomach and uterine cancers than NH and the US. In addition, the County has higher rates of death from brain, breast, leukemia and ovary cancers than NH and the US.<sup>13</sup> Cheshire County also has a significantly higher rate of adults with asthma at risk from obesity related co-morbidity and asthma exacerbation when compared to NH.<sup>14</sup>

A US EPA grant will fund building and impacted soils removal under controlled conditions and include monitoring of air quality. Residents will wonder less about dust outside their apartment and on the front porch furniture, and will be reassured that grandkids can play safely intown.

**(3) Economically Impoverished/Disproportionately Impacted Populations (3 points)**

As noted previously, a disproportionate number of Walpole Center residents are low income. In fact, the proportion of households in the Center with income and benefits less than \$25,000 is 20.7% compared to 7.6% for NH and 11.7% for US.<sup>15</sup> Walpole Center and the area proximal to the Site includes a high density of more affordable apartments including a great deal of senior housing. These renters tend to be lower-income residents, and seniors living on fixed income. Therefore, senior and lower income residents are apt to be disproportionately affected by Site environmental conditions. Logically, seniors and lower income residents will preferentially benefit from remediation implemented through the award of US EPA cleanup funds.

Also, Walpole’s seniors and lower-income residents benefit most from the planned park and off-street parking benefits seniors by allowing more on-street disability parking and walkable streets.

**2.b Community Engagement (8 points)**

**2.b.i Community Involvement (5 points):**

In addition to Town support (Selectmen’s Office, Highway Department, Police Department, use of town resources and facilities) the following community partners and stakeholders will provide meaningful support and guidance, as noted in the table below:

<b>Partner Name</b>	<b>Point of Contact</b>	<b>Specific Role in the Project</b>
The Walpole Foundation (Non-profit community investor and abutter)	Raynie Laware 802.376.9972	Provide design input; key stakeholder providing access to Site.
Mascoma Bank (owner of adjoining off-street parking, abutting bank)	Katie Dearborn 603.756.9293	Provide input on parking lot integration and design.
Citizen Abutters (private phone numbers not listed)	David Adams Felicia Phillips Jane Vesper	Stakeholder input on clean-up planning and implementation, redevelopment outcomes.
Walpole Senior Citizens Group (Village target population)	Jerry Galloway 603.756.4006	Target population voice, liaison to ensure Sr. community needs are met.
Southwest Region Planning Commission (planning resource)	J.B. Mack 603.357.0557	Programmatic support, strategic and community development planning.
Monadnock Alliance for Sustainable Transportation	Henry Underwood 603.357.0057	E-vehicle charging stations design resources and funding guidance.

<sup>13</sup> New Hampshire State Cancer Registry, 2015 (latest data available).

<sup>14</sup> Behavioral Risk Factor Surveillance Survey, 2015 (latest data available).

<sup>15</sup> 2013-2017 American Community Survey 5 Year Estimates, Table DP03

**2.b.ii Incorporating Community Input (3 points):**

Walpole is a tight-knit community and frequent engagement of stakeholders is essential for outcomes responsive to village needs. Therefore, the Selectboard will provide updates and solicit community input in monthly scheduled meetings, and more focused engagement at three dedicated public meetings at key project milestones. During the initial meeting a Clean-up Task Force comprised of Partner, NH DES, and US EPA representatives will be created as a guiding body. Meeting agendas will be posted in the CLARION newspaper, the Walpolean, online news alert, the Town web page and on public bulletin boards. Responses to questions or concerns will be made during the public meetings and in writing posted on the web page. Published project documents will be accessible for comment at Town Hall and on the Town’s web page.

To date, the community has already participated in three public Town Hall meetings pertaining to this specific project, including discussions on property contamination, acquisition and re-use.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (35 POINTS)**

**3.a Proposed Cleanup Plan (8 points):**

The cleanup of the Central Plating Site requires: (1) the elimination of human exposure risks and ongoing sources to groundwater impacts arising out surface and near-surface releases of plating solutions, metal coating products, and process-related substances (containing metals and PFAS); and (2) the ability to integrate with Site re-use plans. An analysis of brownfields cleanup alternatives (ABCA) was conducted to evaluate the effectiveness, feasibility and cost of three remediation options for Site contamination. Site contaminated media include:

- Soils beneath a system of wastewater sumps in the Site building, and in the footprint of the demolished industrial building, especially beneath the area of the plating lines; and
- Groundwater impacted by the noted releases.

Because site contaminants are not volatile in their current state, soil vapor and indoor air quality do not require remedial planning (other than for airborne dust from soils). The vertical and horizontal extent of metals-impacted soils is characterized in detail. Impacts extend through silty sand to a clay layer as much as 17 ft below grade. Chromium levels are high and most soils greatly exceed the toxicity characteristic leaching procedure 20x contaminant threshold. Therefore, cost estimates consider that most soils test hazardous by characteristic, once generated (i.e., excavated and stockpiled). State PFAS soils standards have not been established. However, because the primary PFAS source is co-located with plating area soils it will also be mitigated.

After thorough evaluation, “Excavate and Dispose of Soils with Soil Remediation Standard Exceedances” was the selected cleanup alternative. The Site building will be abated of hazardous materials, the sump’s contents removed and properly disposed of, and the building demolished to access underlying contaminated soils. Non-regulated building materials are to be recycled to the extent practicable. Soil exceeding NH Env-Or 600 standards will be excavated from beneath the Site building sumps and the former plating area, field screened and segregated/stockpiled based on degree of contamination (which may allow for some disposal cost savings), tested for waste characterization, and disposed of at appropriate permitted facility(ies). Non-regulated soils will be reused as backfill in remedial excavations on the lot of origin and beneath the proposed parking lot pavement section, but above the groundwater table. With grant-funded cleanup completed, the compact Site will provide a clean canvas for the redevelopment plan. Site groundwater monitoring, which will not impede re-use plans, is required until standards are met.

### **3.b Description of Tasks and Activities (12 points)**

#### **3.b.i Project Implementation (6 points):**

The following tasks, all of which are eligible for clean-up grant funding, will be implemented as indicated below. Timelines are listed for each subtask using quarter-year increments over the three-year grant period for the quarter in which the task is completed (i.e., Q1-Q12).

Task 1: Cooperative Agreement Oversight. The Town Project Director (TPD) will: develop, organize, and administer programmatic and cleanup activities (through Q12); assemble a Brownfield Cleanup Task Force comprised of Town, Southwest Region Planning Commission (SWRPC), US EPA, and NH DES staff and community stakeholders (by Q1); and select a Qualified Environmental Professional (QEP) through a competitive process in accordance with 40 CFR 30, with Task Force input (by Q2).

Task 2: Community Outreach and Engagement. The TPD will: notify the adjacent land owners and community organizations of cleanup schedules (through Q6); hold three dedicated public meetings to educate and update the community regarding cleanup and proposed redevelopment (by Q4); and prepare public outreach materials (through Q12). Outreach, communication, and responses to input will be provided at monthly Town meetings and prior to undertaking the cleanup efforts, during remediation, and following the successful completion of remediation.

Task 3: Site Specific Activities. The QEP will: prepare final ABCA and specifications (by Q3); prepare a site-Specific Quality Assurance Project Plan (SSQAPP) for post-abatement clearance sampling, PFAS delineation and confirmatory sampling, and waste characterization sampling (by Q3); subsequent to NH DES and US EPA documents approval, assist the Town with clean-up contractor bid solicitation and Town remediation contractor selection processes (by Q4).

Task 4: Oversee Site Cleanup. The QEP, working at the direction of the TPD, will oversee cleanup activities (abatement/demolition, excavation/disposal, restoration) and perform project monitoring and reporting to ensure compliance with the specifications (by Q7).

#### **3.b.ii Task/Activity Lead (3 points):**

The TPD is in responsible charge for the project to ensure that project implementation conforms with agreement requirements. The TPD will rely on her capable team for guidance: NH DES (regulatory), US EPA (for programmatic clarifications, draft work products review), and the QEP (for professional services). Town support staff (TSS) are available to support the TPD. In addition, SWRPC (Project Partner) has extensive Brownfields program experience and has pledged assistance. As such, the TPD is the lead for Tasks 1 and 2.

The QEP lead (with TPD oversight) is required for design and implementation of Tasks 3 and 4.

The Town Health Officer will review specification requirements for air monitoring, will be provided work plans, and timely information on asbestos abatement and soils excavation air monitoring to ensure resident safety is maintained and have authority to intervene, as warranted.

#### **3.b.iii Cost Share (3 points):**

The 20% grantee match/cost share (\$100,000) is comprised of the estimated allocations below:

- Tasks 1, 2, 3, and 4 TPD, TSS (including Health Officer) costs and supplies (\$17,105);
- Task 4 service/equipment hourly fees for police detail (car and cruiser) for security services and for traffic control (4 weeks) as trucks enter or leave the Site (\$16,700);
- Task 4 Highway Department equipment plus operator fees and clean backfill material and placement costs once the Site has been remediated (\$50,775). \$11,660 of this task total is for rental cost and materials purchase; and

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- Payment of cost-share/match from dedicated funds for the balance (\$15,420).
- No administrative fees have been budgeted for cost share or reimbursement.

**3.c Cost Estimates and Outputs (10 points)**

**3.c.i Cost Estimates (7 points):**

The below cost estimates incorporate Town employee and resource cost data, regional contractor’s rate data, as well as solicited soil disposal costs for Site contaminants.

Budget Categories		Project Tasks (\$)				
		Cooperative Agreement Oversight	Community Outreach & Engagement	Site-Specific Activities	Oversee / Site Cleanup	Total
Direct Costs	Personnel	\$6,384	\$2,988	\$2,828	\$2,828	\$15,028
	Fringe Benefits	\$576	\$432	\$192	\$192	\$1,392
	Travel	-	-	-	-	-
	Equipment	-	-	-	-	-
	Supplies	\$140	\$395	\$75	\$75	\$685
	Services	-	-	-	\$67,475	\$67,475
	Contractual	\$2,000	\$7,250	\$26,400	\$479,770	\$515,420
	Other (subawards)	-	-	-	-	-
Total Direct Costs		\$9,100	\$11,065	\$29,495	\$550,340	\$600,000
Indirect Costs		-	-	-	-	-
Total Federal Funding (not exceed \$500,000)		2,000	\$7,250	\$26,400	\$464,350	\$500,000
Cost Share (20% of requested federal funds)		\$7,100	\$3,815	\$3,095	\$85,990	\$100,000
Total Budget (TDC + IC + CS)		\$9,100	\$11,065	\$29,495	\$550,340	\$600,000

Additional cost detail is provided below (note: TPD costs will not include fringe benefits, TSS cost does include fringe benefits; timeline assumes implementation will occur over 24 months):

**Task 1. Cooperative Agreement Oversight.** TPD is allocated 24hrs x \$50/hr = \$1,200 for QEP selection; and 3hr/mo x 24mo x \$50/hr = \$3,600 for program development, organization, and oversight of Brownfields cleanup. TSS are allocated 3hrs/mo x 24 mo x \$30/hr (pay plus fringe benefits) = \$2,160, for programmatic needs (quarterly Assessment, Cleanup & Redevelopment Exchange System (ACRES) updates, municipal match resource coordination, TPD support, etc.), plus \$140 supplies. QEP is allocated 20hrs x \$100/hr = \$2,000 for programmatic support.

**Task 2: Community Outreach and Engagement.** For monthly Town meetings: TPD is allocated 1hr x 24mo x \$50/hr = \$1,200; TSS are allocated 1.5hr x 24mo x \$30/hr = \$1,080. For three dedicated outreach meetings: 3 ea x 4hrs x \$50/hr = \$600 TPD; 3 ea x 6hrs x \$30/hr = \$540 TSS plus \$395 supplies (brochures, ads, mailer). QEP services (\$7,250) include 65hrs x \$100/hr plus travel/expenses over the 24-months for outreach. This total includes QEP costs for three dedicated meetings, at \$1,250 each (10hrs x \$100/hr QEP preparation plus \$250 travel expense and supplies) and an additional 35hrs x \$100/hr in support of monthly meetings.

Application for U.S. EPA Brownfield Cleanup Grant – Narrative Proposal  
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Task 3: Site Specific Activities. For review and comment on QEP deliverables and participating in contractor selection TPD is allocated 46hrs x \$50/hr = \$2,300. TSS are allocated, 24hrs x \$30/hr = \$720 plus \$75 postage/copies for bid solicitation, selection and negotiation support. \$26,400 is budgeted for QEP services including the final ABCA, SSQAPP, specifications and contractor bid documents, and bidder Site walk and selection process management.

Task 4: Oversee Site Cleanup. TPD and TSS budget is identical to Task 3. The Town is also providing the following services: police detail for truck traffic (4 weeks) and security (\$16,700); restoration materials and services (hauling/placing/compacting 610 tons gravel: \$50,775). Contractor costs are for abatement, demolition, excavation, stockpiling, loading, partial backfill, air monitoring. Hazardous waste soils are disposed at an estimated rate of \$350/ton (nearly \$300,000). NH DES leveraged funds will cover disposal costs to augment the EPA grant; therefore, tabulated cleanup costs were reduced by \$100,000. Total contractor grant-funded costs are \$397,770, estimated. QEP cost for abatement, cleanup and restoration oversight, soils testing (delineation, field screening, confirmatory, waste characterization) and reporting is \$82,000.

**3.c.ii Outputs (3 points):**

Central Plating Brownfield Clean-up Project outputs will be:

- Outreach Agendas (3), Published Materials (2), Outreach Responses and Summaries (24);
- Final ABCA (Remedial Action Plan as required by the NH DES);
- SSQAPP, detailing data quality objects and quality assurance and control measures;
- Contractor Bid Specifications and Plans, detailing clean project requirements; and
- Remedial Implementation Report – Documents the remedial activities and results.

**3.d Measuring Environmental Results (5 points):**

The Town (TPD and support staff) will create a detailed and comprehensive schedule for milestone completion, the outline for which is presented in **Section 3.b.i**, above. Progress will be tracked and measured relative to the schedule using appropriate software, any deviations will be assessed, corrective measures will be identified and implemented, and the schedule revised as appropriate.

Public updates on a monthly basis is high-frequency public engagement intended to optimize communication of progress, solicit input, allow for incremental refinements in approach, and garner support. Significant setbacks that are within the control of the Town are, therefore, unlikely. Furthermore, because the Site and clean-up approach is well understood, adherence to the schedule is probable. The 24-month project implementation schedule allows an additional 12 months for adjustments, in the event of unforeseen delays. In addition to use of available scheduling software, progress will be tracked and measured via ACRES and quarterly reporting.

The primary outcome of this project will be the abatement and removal of the Site building and removal and disposal of contaminated soils that presently pose a health risk to the village and are an ongoing source to groundwater impacts. Issuance of a Certificate of Completion by the NH DES will provide State liability relief through New Hampshire Brownfields Program, as the Town and Site are presently enrolled in that state program.

Finally, the Town will have a backfilled Site, a clean canvass upon to paint the Town's vision of enhanced village off-street parking, E-vehicle charging stations and a functional pocket park.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (15 POINTS)**

##### **4.a Programmatic Capability (9 points)**

##### **4.a.i Organizational Structure (5 points):**

The Town of Walpole has the capability of managing and completing grant services within the three-year performance period. Peggy Pschirrer, the Select Board Chair, with over thirty years in management experience, governance issues and fund raising, will provide project supervision, resource coordination and project communications as the TPD. TSS will include: Richard Kreissle, an accountant and Director of Finance; Thomas Goins, a retired corporate accountant, and Town Treasurer; and Margaret Palmer, an Assistant Treasurer to ensure procedures for handling all grant funds meet all agreement requirements. Sarah Downing, our very capable Manager of Administration, will fulfill reporting and related administrative requirements.

In addition, the Town will select a QEP (see **Section 4.a.ii**) with the qualifications necessary to be a team resource for programmatic needs. Our proposed budget allocates sufficient funds for this role and it is envisioned that the TPD and TSS will work closely with the QEP.

##### **4.a.ii Acquiring Additional Resources (4 points):**

The Town regularly issues Requests for Proposals, negotiates contracts, and engages contractors to meet Highway Department, Recycling, and Water and Sewer Department needs. In addition, as noted in **Section 2.b.ii**, in our first public outreach meeting we will be establishing a Cleanup Task Force comprised of selected community partners/stakeholders, and SWRPC (a successful US EPA Brownfields Assessment grantee), NH DES, and US EPA representatives. The Task Force will assist with procurement of grant services (including QEP and contractor services), which will be in strict accordance with requirements under the US EPA grant agreement and all applicable state and federal requirements. Once selected, the QEP will provide assistance for technical and programmatic project needs, including technical aspects of contractor selection.

##### **4.b Past Performance and Accomplishments (6 points)**

##### **4. b. ii No Prior US EPA Brownfields Grant. Other Assistance Agreement Experience.**

**(1) Purpose and Accomplishments (3 points)** Walpole receives State assistance funds and grants, managed and administered in accordance with funding requirements. Recent examples include: (1) An August 2017 NH State Highway Grant (\$119,99.51) to redesign and install storm drains and a culvert. The Town hired a State-approved Engineer, selected a contractor through a fair and competitive process, and negotiated a construction contract. Work begins on-schedule, in February. Design documents comply with NHDES requirements, physical repairs are in progress, and expenditures align with the budget. (2) Annual State of NH road maintenance grants (\$125,000 typical). The Road Agent and Select Board collaborate to prioritize funds use in conformance with an implementation schedule. Projects status and fund expenditures reporting is maintained internally. Work is successfully implemented each year on schedule and on budget. (3) A State Moose Plate grant (\$10,000), approved by the NH Executive Committee and the Governor, for Library improvements. Design, including public input, was completed prior to the grant award. Contractor selection was through a fair and competitive process. Groundbreaking for building improvements is in April for completion in Fall 2019. The Town provides updates at public meetings and is accountable to the NH Department of Cultural Resources.

##### **(2) Compliance with Grant requirements (3 points)**

Walpole's State funding awards management, and project outputs and outcomes (as noted above) comply with agreement requirements, and no corrective actions have been issued.

Application for U.S. EPA Brownfield Cleanup Grant – Narrative Proposal  
Town of Walpole, New Hampshire

Narrative Proposal Attachment 1 - Documentation of Committed Leveraged Resources

- Copy of Escrow Agreement
- NH DES Brownfield Revolving Loan Fund – Cleanup Grant Letter of Commitment

## CONTRACT FOR SALE AND PURCHASE

THIS IS A CONTRACT for Sale and Purchase (Contract), by and between THE ESTATE OF NILS WESTBERG, the owner of two parcels of real property that are the subject of this Contract ("Seller"), and THE TOWN OF WALPOLE, a political subdivision of the State of New Hampshire, acting by and through its duly authorized Selectboard ("Buyer").

1. AGREEMENT. Seller agrees to sell and Buyer agrees to buy the real property and improvements described in Paragraph 3, infra., upon the terms and conditions stated in this Contract.

2. CONSIDERATION. The Purchase Price is One (\$1.00) Dollar.

3. PROPERTY. The Property consists of two adjoining land-locked parcels within the center of Walpole village. The parcels are designated as Lots 65 and 66 on the Town of Walpole Tax Map 20 and are approximately 0.089 and 0.190 acres, respectively. Access to the Property is via a right-of-way from Westminster Street. Lot 65 is improved with a 1,008 square foot single-story building. Lot 66 no longer has buildings. Other than the building noted on Lot 65, the Property is vacant, and much of the Property is composed of paved surfaces and the sparsely vegetated footprint of the former building on Lot 66.

4. TITLE EVIDENCE. Seller shall convey title to the Property to Buyer subject only to the following title exceptions: (i) exceptions for a lien for local real estate taxes and assessments not yet due or payable; (ii) the standard preprinted exceptions and exclusions listed on a title commitment ("Title Report") issued by a reputable title company acceptable to Buyer; and (iii) any other exception shown on the Title Report, other than exceptions for monetary liens, which Buyer does not object to by written notice. Buyer shall examine the Title Report and shall have thirty (30) days to furnish to Seller a written statement of any objections to title. If Seller is unable or unwilling to satisfy all of the stated title objections by the date set for closing, Buyer may, at its option: (a) waive the title objections and proceed to close; (b) at Buyer's expense, cure such title defects as may be cured by the payment of money; or (c) terminate this Agreement, in which case Seller and Buyer shall have no further rights, obligations or duties hereunder.

5. SELLER'S AFFIDAVIT AS TO UNRECORDED MATTERS, POSSESSION AND MECHANIC'S LIENS. Subject to any provisions in the Contract to the contrary, Seller must furnish to Buyer at Closing an affidavit in a form acceptable to the Buyer's title insurance company and sufficient to remove standard printed exceptions to title in an owner's policy of title insurance regarding (i) unrecorded matters (except for taxes not yet due and payable and special assessments not shown by the public records), (ii) parties in possession, except for the rights of tenants, if any, as tenants only, in possession and occupancy of the Property under written leases which have been furnished to Buyer by Seller and accepted by Buyer in writing, and (iii) mechanic's liens. Seller represents to Buyer that there are and at Closing there will be no tenants or lessees occupying the Property or any portion of the Property.

6. DOCUMENTS FOR CLOSING. At Closing the parties shall deliver the following:

a. Seller's Closing Documents. At the Closing, Seller shall execute (before witnesses and with appropriate oaths and acknowledgments as indicated) and deliver to Buyer the following:

(i) Quitclaim Deed conveying to Buyer or Buyer's designee(s) fee simple title to the Property, subject to the Permitted Exceptions defined below;

(ii) Any title insurance affidavits required;

(iii) a non-foreign FIRPTA affidavit;

(iv) general title curing documents;

(v) state tax forms; and

(vi) such other documents as reasonably required by the title insurance company.

b. Buyer's Closing Documents. Buyer shall execute and deliver, or otherwise deliver, to Seller at Closing such other documents as reasonably required of Buyer by the title insurance company.

c. Additional Closing Documents. Seller and Buyer shall execute and deliver counterpart closing statements and execute and deliver, or otherwise deliver, such other documents as are reasonably necessary to consummate the transactions contemplated under this Contract.

7. COSTS AND EXPENSES. Seller and Buyer will pay costs and expenses as follows: Prorated property taxes; Title Insurance (Buyer); Survey (Buyer); Recording of Deed (Buyer); Buyer's Attorney's Fees (Buyer); Seller's Attorney's Fees (Seller); costs to cure title defects and encumbrances (Seller).

8. BROKERS. Neither Buyer nor Seller has utilized the services of, or for any other reason owes compensation to a licensed real estate broker. There are no other brokerage commissions or payments required under this provision. The parties represent and warrant to one another that no other licensed real estate broker or salesperson other than listed here has been used to procure this sale.

9. TAXES AND ASSESSMENTS. This transfer is exempt from real estate transfer tax. NH RSA 78-B:2 I.

10. CONVEYANCE AND TRANSFER OF TITLE. Seller shall convey title to the Property by Quitclaim Deed, the form of which is attached as Exhibit B, subject to the following (Permitted Exceptions):

a. Ad valorem real estate taxes for the year of Closing and all subsequent years.

b. All applicable laws, ordinances and governmental regulations, including, but not limited to, all applicable building, zoning, land use and environmental ordinances and regulations.

c. Those matters disclosed by the title insurance commitment or the survey obtained by Buyer that not objected to or are subsequently waived by Buyer, as provided in Section 4.

d. Any liens or other encumbrances resulting from the actions or agreements of Buyer (however, nothing contained herein is intended or shall be construed as granting Buyer any right, power or authority such that its actions or agreements can result in any lien or other encumbrance being imposed with respect to the Property).

Time is of the essence.

11. CLOSING. This transaction will be closed and the Quitclaim Deed and other closing documents delivered to Buyer at the Office of the Selectboard, P.O. Box 729, 34 Elm Street, Walpole, NH 03068 no later than January 3, 2019.

12. ATTORNEY FEES; COSTS. In connection with any litigation arising out of the Contract, each party is responsible for its own attorneys' fees and costs.

13. SURVIVAL. It is understood and agreed that all representations and warranties contained in the Contract and any provision of the Contract which by their nature and effect are required to be observed, kept or performed after Closing, (i) survive Closing and the delivery of the Quitclaim Deed, and (ii) remain binding upon and for the benefit of the parties to the Contract, their respective successors and assigns, until fully observed, kept or performed.

14. ASSIGNABILITY. Buyer and Seller cannot assign the Contract or rights under the Contract without the express written consent of the other, which consent may be given or withheld in such party's sole and exclusive discretion.

15. RISK OF LOSS. The risk of loss to the Property is the responsibility of Seller until Closing.

16. OTHER AGREEMENTS. No prior or present agreements or representations are binding upon Buyer or Seller unless included in the Contract. No modification or change in the Contract are valid or binding upon the parties unless in writing and executed by the parties to be bound.

17. NOTICES. All notices and other communications required under this Contract shall be in writing and shall be deemed given (i) when delivered by hand to the recipient named below or their employee at the specified address, (ii) upon mailing by certified mail, return receipt requested, postage prepaid to the following addresses, (iii) upon delivery to FedEx or

UPS for prepaid next day delivery to the following addresses; (iv) upon facsimile delivery, provided a confirmation receipt is retained. Any party may change the address to which notices are to be sent to such party by written notice to the other parties specifying such change of address. Legal counsel to the parties may give notices on behalf of their clients.

If to Seller:                   The Estate of Nils Westberg  
P.O. Box 1045  
Old Saybrook, CT 06475

Jason Reimers, Esquire  
BCM Environmental & Land Law, PLLC  
3 Maple Street  
Concord, NH 03301

If to Buyer:                   Town of Walpole  
P.O. Box 729  
34 Elm Street  
Walpole, NH 03608; and,

G. Jeremy Hockensmith, Esquire  
28 Middle Street  
Keene, NH 03431

18. COUNTERPARTS. The Contract will be executed in duplicate counterparts, both of which taken together constitute one and the same instrument and any party or signatory may execute the Contract by signing a counterpart. A facsimile or electronically transmitted copy of the Contract and any signatures on the Contract will be considered for all purposes as originals.

19. SURVEY. Buyer may obtain a survey at its own expense. If Buyer prepares a survey and title defects are disclosed, the provisions of Section 4 shall apply.

20. ENVIRONMENTAL.

a. "AS-IS" Condition of Property. Buyer is aware that the Property is contaminated. Except as otherwise provided in this Contract, Buyer acknowledges that Seller is conveying the Property in its present "AS IS" and "with all faults" condition, and, except as specifically provided in this Contract or the documents executed and delivered by Seller at Closing, has not made and does not make any warranties or representations, whether express or implied, with respect to the Property, the condition, value, or marketability thereof, or its suitability for Buyer's intended use. Buyer acknowledges that it has made or will make all factual, legal, and other inquiries or investigations it deems necessary, desirable, or appropriate with respect to the Property and the value thereof, and, subject to the express representations, warranties and covenants of Seller set forth in this Contract and the Seller's Closing Documents, it has and will rely solely on such inquiries and investigations.

Notwithstanding the above, Seller shall, after Closing, cooperate as requested by Buyer in connection with applications for NH DES and USEPA Brownfields Grant and Matching Funds programs, and any remedial work. Cooperation shall include, but not be limited to, participating in the process and supplying past test results, site assessments, and related documents and information as may become necessary through the grant process – but “cooperation” shall not require any financial contribution above the amount listed in ¶20c.

b. USEPA Brownfields Grant and Remediation. Buyer intends to apply to the USEPA to obtain grants, including Brownfields Cleanup Grants, to remediate the Property. Seller agrees to contribute \$170,000; these “leveraged” funds may be used by Buyer for cost-share requirements of any such USEPA Brownfields Cleanup Grant, remediation costs, ongoing monitoring of the property, and other remediation-related expenses. Seller agrees to also contribute \$5,000 for the purpose of fencing the Property. Seller’s contributions shall be placed in an escrow account within ten (10) days of Closing. Notwithstanding anything to the contrary, the contribution herein may be made directly to Buyer by an individual or entity separate and apart from Seller on its behalf (“Contributing Party”). Buyer agrees to provide any Contributing Party with written acknowledgment of said contribution for tax reporting purposes. After the contribution is placed into escrow, Seller or the Contributing Party shall have no interest in the escrowed funds other than as provided in this paragraph. This escrow account shall be maintained by the Buyer’s attorney, G. Jeremy Hockensmith, Esquire, 28 Middle Street, Keene, New Hampshire (“Escrow Agent”). Escrow Agent shall only release the funds upon approval of the parties, which approval shall not be unreasonably withheld. In the event of any dispute relative to the deposit monies held in escrow, the Escrow Agent may, in its sole discretion, pay said deposit monies into the Clerk of Court of proper jurisdiction in an Action of Interpleader, provide each party with notice thereof at the address recited herein, and thereupon the Escrow Agent shall be discharged from its obligation as recited therein, and each party to this Agreement shall thereafter hold the Escrow Agent harmless in such capacity. Both parties hereto agree that the Escrow Agent may deduct the cost of bringing such Interpleader Action from the deposit monies held in escrow prior to the forwarding of the same to the Clerk of such Court.

c. Release. Upon Closing, Buyer and its successors and assigns shall forever release Seller, and their respective parents, subsidiaries and affiliates and their respective officers, directors, employees, shareholders, representatives, members, successors, heirs and assigns (collectively “Released Parties”) from any and all claims, demands, damages, losses, costs and expenses, attorneys’ fees, court costs, awards, settlements, judgments, penalties, fines, liens, actions or causes of action at law or in equity, whether direct or indirect, known or unknown, foreseen or unforeseen (collectively “Damages”), arising out of or relating in any way to the physical condition of the Property or the presence of Hazardous Materials (hazardous or toxic substance, materials or waste, pollutants, contaminants or other material regulated for the protection of human health, safety or the environment) thereon, including, without limitation, actions under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601, et seq., as amended, the Resource Conservation and Recovery Act, 42 U.S.C. 6901, et seq., Chapters 147-A, 147-B, 147-C, and 147-D of the New Hampshire revised statutes annotated, and any other applicable environmental laws, statutes, ordinances, rules, regulations or orders now or hereafter in effect. At the election of Seller, the provisions of this subsection shall be set forth in the deed to be delivered by Seller to Buyer at Closing.

d. Pursuant to ¶13, the covenants and obligations contained in this paragraph (¶20 (a. through c.)) shall survive the Closing, and shall not be exempt from any integration or similar clause.

21. OCCUPANCY AND POSSESSION. Seller warrants delivery of possession of the Property to Buyer at Closing.

22. MISCELLANEOUS.

(a) Headings. The captions, headings, and paragraph titles in this Contract are for convenience or reference only, and are not intended in any way to restrict, affect or interpret the provisions of any paragraph of this Contract.

(b) Severability. If any term, provision, covenant, or condition of this Contract or the application thereof to any person or circumstances shall, to any extent, be held invalid or unenforceable, the remainder of this Contract or the application of such term, provision, covenant, or condition to persons or circumstances other than those as to which it is held invalid or unenforceable shall not be affected, and each term, provision, covenant, or condition of this Contract shall be valid and enforceable to the fullest extent permitted by law.

(c) Construction/Venue. This Contract shall be construed in accordance with the laws of the State of New Hampshire and shall not be more strictly construed against either party by reason of the fact that one party may have drafted or prepared any or all of the terms and conditions. Venue of any legal proceeding arising out of this Contract shall be in Cheshire County, New Hampshire.

(d) Effective Date. This Contract shall have no effect unless approved by the Town of Walpole Selectboard. The Effective Date of this Contract shall be the date of the last to occur of the signature by all parties and the approval of the Town of Walpole Selectboard. The Buyer voted on \_\_\_\_\_ to authorize this purchase Authority. Each of the persons executing this Contract warrant that they have the authority necessary to bind each of the parties to the terms and conditions described in this Contract.

(e) No Admission of Liability. The execution of this Contract is not intended, nor should it be construed, as an admission of liability on the part of either party or their successors and assigns for any contamination discovered on the Property.

(f) Waiver. No delay or omission by any of the parties hereto, or their successors and assigns, to exercise any right or power accruing upon any non-compliance or failure of performance by another party under the provisions of this Contract shall impair any such right or power or be construed to be a waiver thereof. A waiver by any of the parties hereto, or their successors or assigns, of any of the covenants, conditions or agreements hereof to be performed by another shall not be construed to be a waiver of any succeeding breach thereof or of any other covenant, condition or agreement herein contained.

(g) Binding Effect. This Contract and each and all of the terms, covenants, and conditions hereof shall be binding upon and inure to the benefit of the parties and their respective heirs, personal representatives, successors and assigns, and no third party, other than such heirs, personal representatives, successors and assigns, shall be entitled to enforce any term, covenant, or condition of this Contract or have any rights hereunder.

(h) Recording. This Contract shall not be recorded.

THIS CONTRACT IS INTENDED TO BE A LEGALLY BINDING CONTRACT. IF NOT FULLY UNDERSTOOD, SEEK THE ADVICE OF AN ATTORNEY PRIOR TO SIGNING.

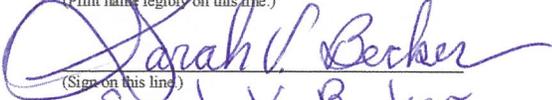
WITNESSES:



(Sign on this line.)

RICHARD GIRNIUS

(Print name legibly on this line.)



(Sign on this line.)

Sarah V. Becker

(Print name legibly on this line.)

SELLER:

**THE ESTATE OF NILS WESTBERG**

By: Marianne Westberg  
\_\_\_\_\_, Administrator

Signature Date: 12.28.18

WITNESSES:

Sarah Downing  
(Sign on this line.)  
Sarah Downing  
(Print name legibly on this line.)

Sarah Downing  
(Sign on this line.)  
Sarah Downing  
(Print name legibly on this line.)

Sarah Downing  
(Sign on this line.)  
Sarah Downing  
(Print name legibly on this line.)

BUYER:  
TOWN OF WALPOLE

By: Peggy Pschirer  
Peggy Pschirer, Chair

Signature Date: 27 Dec 2018

By: Steve Dalessio  
Steve Dalessio, Member

Signature Date: Dec 27 2018

By: Cheryl Mayberry  
Cheryl Mayberry, Member

Signature Date: \_\_\_\_\_



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Robert R. Scott, Commissioner**

EMAIL ONLY

January 8, 2019

Peggy Pschirrer, Selectboard Chair  
Town of Walpole  
PO Box 729  
Walpole, NH 03608

**Subject: Walpole** – Central Plating Site, 12 Westminster Street  
DES Site #199806071, Project #38111  
**Brownfields Revolving Loan Fund – Cleanup Grant**

Dear Ms. Pschirrer:

The New Hampshire Department of Environmental Services (NHDES) is pleased to inform the Town of Walpole of our intent to award a cleanup grant from New Hampshire's Brownfields Revolving Loan Fund (RLF). NHDES intends to award up to \$100,000 for the purpose of funding a portion of the remediation of the Central Plating Site located in Walpole, New Hampshire. Specifically, the funding will be used for contaminated soil transportation and disposal.

Please note that this grant is contingent upon obtaining funding for the balance of the cleanup project from alternative sources (e.g., an EPA Brownfields Cleanup Grant). Furthermore, NHDES' grant is intended to fill any funding gaps for this project. As such, should the Town of Walpole be successful in being awarded an EPA Brownfields Cleanup Grant, those funds shall be expended first before requesting the disbursement of funds from NHDES.

We look forward to continuing our work with the Town of Walpole on the successful cleanup of the Central Plating site. Please contact me should you have any questions.

Sincerely,

Michael McCluskey, P.E.  
Brownfields Program  
Hazardous Waste Remediation Bureau  
Tel: (603) 271-2183  
Fax: (603) 271-2181  
Email: [Michael.McCluskey@des.nh.gov](mailto:Michael.McCluskey@des.nh.gov)

ec: Keith DuBois, P.G., Asst. Director, NHDES-WMD  
Karlee Kenison, P.G., Administrator, NHDES-HWRB  
Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB

[www.des.nh.gov](http://www.des.nh.gov)

PO Box 95, 29 Hazen Drive, Concord, NH 03302-0095  
Telephone: (603) 271-2908 Fax: (603) 271-2181 TDD Access: Relay NH 1-800-735-2964

Application for U.S. EPA Brownfield Cleanup Grant – Narrative Proposal  
Town of Walpole, New Hampshire

Narrative Proposal Attachment 2 - Threshold Criteria Responses

**Attachment to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire**

**Attachment – Response to III.B. Threshold Criteria for Cleanup Grants**

**1. Applicant Eligibility**

The Town of Walpole is the property owner and affirms that it is the eligible applicant.

**2. Previously Awarded Cleanup Grants**

The Town of Walpole affirms that it has not previously received a United States Environmental Protection Agency (U. S. EPA) Clean-up Grant for this Site.

**3. Site Ownership**

The Town of Walpole affirms that it is the sole owner of the Property (Lot 65 and 66 on Map 20), and purchased the property on January 3, 2019, and will maintain sole ownership of the property until the grant services are completed and the grant is closed out. A copy of the deed transferring the property to The Town is included as Threshold Criteria - Attachment 1.

**4. Basic Site Information**

Name of the Site: Central Plating Site

Address of the Site: 12 Westminster Street  
Walpole, NH 03608

Current Owner of the Site: Town of Walpole

**5. Status and History of Contamination at the Site**

**a. Describe the types of contaminants present (hazardous substances and/or petroleum)**

Soil and groundwater at the Central Plating (CP) Site which is comprised of two adjoining parcels on 0.279 acres, have been impacted by releases of metal plating solutions (hazardous substances) from past on-Site operations of the now defunct (decommissioned and partially removed) CP facility. Site groundwater has also been impacted by gasoline constituents from an off-Site source which is being addressed by the responsible party of that petroleum source (not the Town) through the New Hampshire Department of Environmental Services (NH DES) Oil and Remediation Compliance Bureau.

**b. Describe the operational history and current uses of the Site**

Of the two industrial buildings that comprised the CP Site, only the garage-style, single-story “Wastewater Pre-Treatment Building” on Lot 65 remains. The “Former Industrial Building” located on Lot 66 was demolished in 2012. CP conducted electroplating of metal parts at the Site from 1963 until circa 2006. Prior to CP’s operations the property was used by a machinist in the 1950s and, based on Sanborn Maps, predecessor site buildings were used for “storage” in the early 1900s.

CP’s metal finishing processes included anodizing of aluminum parts; chrome electroplating; nickel electroplating; chromate electropolishing; black oxide finishing; passivation; and lacquer coating of racks used in nickel plating. As shown on a 1990 layout schematic, a floor drain was located in the south end of the Former Industrial Building and wastewater was piped underground from sumps in the Former Industrial Building to sumps in the north end of the separate Wastewater Pre-Treatment Building. Wastewater from the operations of CP was directed to the municipal sewer system since the start of operations. Chrome fume

**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

suppressant(s) (commonly per- and poly-fluorinated alkyl substances (PFAS)) were reportedly used to control hazardous emission of hexavalent chrome fumes in the early 2000s and perhaps the late 1990s. In addition, Teflon coating (another PFAS source) was apparently one of the coatings applied based on records documenting a Teflon above-ground storage tank in the Former Industrial Building.

Currently the property is vacant and abandoned; the garage-like Wastewater Pre-Treatment Building was most recently used for storage by the previous owner.

**c. Describe the environmental concerns for the Site**

The confirmed on-site Recognized Environmental Conditions include two areas of chromium (both hexavalent, i.e., carcinogenic, and trivalent) impacted soils: one estimated 550 ton mass of soils in the footprint of the Former Industrial Building chromium and nickel plating areas that extends from the ground surface to about 17 feet below grade on Lot 66; and one estimated 215 ton mass of soils beneath several wastewater sumps under the Wastewater Pre-Treatment Building on Lot 65. For exposed soils (i.e., the soils beneath the removed plating area slab), contaminant concentrations of chromium were generally highest near the ground surface and are a human exposure risk through dust inhalation (if disturbed), dermal contact and ingestion. Contaminant concentrations in these near-surface soils are more than 10 times higher than risk-based exposure standards.

Groundwater impacts above regulatory standards (notably for chromium, nickel, cadmium and PFAS) were documented in groundwater samples from on Site monitoring wells and the plumes are inferred to extend off-site onto the west-abutting residential property. Two primary groundwater sources of PFAS are inferred, one of which is co-located with metals impacted soils in the former plating area, and the second in the area of the former aboveground Teflon storage tank, both on Lot 66. Although no consumptive use of groundwater in proximity to the Site was identified and no indoor air risk is inferred for Site contaminants, contaminant source removal or containment is required by the NH DES to both mitigate human health contact risks for soils and to remove sources of ongoing groundwater quality impacts.

In addition, hazardous building materials (asbestos), universal wastes (regulated light ballasts, light bulbs, and thermostat switches) and metals-rich dry granular residues (also containing arsenic, cadmium, chromium, nickel, lead, and zinc as well as cyanide) in the base of former waste water pre-treatment sumps were identified as part of the Wastewater Pre-Treatment Building Hazardous Materials Inventory. Removal of that remaining Site building is necessary to access and excavate impacted soils beneath the wastewater pre-treatment sumps that act as a source for one of the plumes emanating from the Site.

Finally, an upgradient leaking underground storage tank (LUST) site has adversely impacted groundwater quality at the Site, resulting in the inclusion of the Site in the Groundwater Management Zone associated with the upgradient LUST site. Cleanup associated with this upgradient source is the responsibility of the owner of that off-site facility and, therefore is not addressed in the Site Analyses of Brownfields Cleanup Alternatives (ABCA) and this grant application.

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**d. How did the Site become contaminated? Describe the extent and nature of the contamination**

The documented soil impacts, most notably hexavalent and trivalent chromium, are inferred to be from releases of solutions (plating solutions, which also included PFAS as a chromium fume/aerosol suppressant) to the floor and then through the former concrete slab (likely in poor condition) to the underlying soils in the Former Industrial Building footprint area, and to the sumps in the Wastewater Pre-Treatment Building. In addition, releases of PFAS are inferred in the Former Industrial Building Teflon aboveground storage tank area, north of the plating area, based on an apparent second PFAS plume in that immediate area. The releases occurred prior under previous ownership, prior to property acquisition by the Town of Walpole in 2019.

The highest concentrations of chromium are in shallow soils, but extend downward vertically through silty sand to a west-sloping dense silty clay unit first encountered at 13 ft below grade (to the east) and at 17 ft below grade (to the west). The depth of the groundwater closely coincides with the depth of an underlying clay unit. A second metals source is present beneath waste water sumps in the Wastewater Pre-Treatment Building, where discharges likely occurred in the past. The depth of soil contamination beneath the sumps also extends to the groundwater table based on elevated impacts to groundwater sampled from monitoring wells proximal to the sumps, just downgradient of that building.

As noted above, hazardous building materials (asbestos), universal wastes (regulated light ballasts, light bulbs, and thermostat switches) and metals-rich dry granular residues (also containing arsenic, cadmium, chromium, nickel, lead, and zinc as well as cyanide) in the base of former waste water treatment sumps were identified as part of the Wastewater Pre-Treatment Building Hazardous Materials Inventory.

The chromium contaminant concentrations in Site soils are well above the “20x” rule (i.e. soil concentrations in mg/kg are above the 20 x the Toxicity Characteristic Leaching Procedure criteria of 5 milligrams per liter (mg/L)) which indicates the likelihood of the soils being classified as a “characteristic” hazardous waste. At the inferred contaminant maximum, soil hexavalent chromium concentrations exceed NH DES Upper Concentration Levels and would not be allowed to remain on Site, even if capped and managed under an Activity and Use Restriction.

Based on groundwater quality for samples collected from source area and off-site downgradient monitoring wells, the Site dissolved contaminants of concern (notably chromium, nickel, cadmium and PFAS) are inferred to extend off-site to the west, in a downgradient direction at concentrations above Ambient Groundwater Quality Standards (AGQS) but are not inferred to not extend beyond the limits of the west-adjointing property at concentrations above AGQSs. In the contaminant plume maxima, the chromium concentration is 50x the AGQS, and the PFAS concentration (i.e., specifically total perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS)) is 100 x the AGQS.

**6. Brownfields Site Definition**

The property meets the definition of a Brownfield under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 101 (39): the CP Site is a real property,

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the expansion, redevelopment, or reuse of which is complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

The Town of Walpole affirms, to the best of its knowledge, that the CP Site is: a) not listed or proposed for listing on the National Priorities List (CERCLA 101(39)(B)(ii)); b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA (CERCLA 101(39)(B)(iii)); and c) not subject to the jurisdiction, custody, or control of the U.S. government (CERCLA 101(39)(B) (vii)).

### **7. Environmental Assessment Required for Cleanup Grant Proposals**

Site Investigation reports equivalent to an ASTM E1903-11 Phase II Environmental Site Assessment (ESA) were completed for the Site. The initial Phase II ESA conducted by Sanborn Head and Associates, Inc., in 2013 identified conditions requiring NH DES notification, and subsequent assessment/investigations were conducted with NH DES Hazardous Waste Remediation Bureau oversight. Phase II ESA/Site Investigations conducted at the Site include:

*Phase II Environmental Site Assessment, 12 Westminster Street, Walpole, New Hampshire;* Sanborn, Head and Associates, Inc., dated December 2013 conducted for Bellows Town LLC, a prospective purchaser. This work was conducted to address recognized environmental conditions and areas of concern identified as part of two predecessor Phase I ESAs.

*Phase II Environmental Site Assessment, 12 Westminster Street, Walpole, New Hampshire,* Ransom Consulting, Inc., dated January 19, 2016; through the Southwest Region Planning Commission (SWRPC) Brownfield Assessment Program under NH DES regulatory oversight. This report also included a Limited Hazardous Material Inventory, dated October 30, 2015 conducted by Ransom for SWRPC. The work was conducted to further delineate areas of releases or suspect releases of hazardous substances to soil and groundwater, partly in response to a requirement for additional information by the NH DES and to provide information in support of remedial planning.

*Data Transmittal for Groundwater Sampling Per- and Polyfluoroalkyl Substances (PFAS) Former Central Plating Site, Walpole New Hampshire,* dated October 13, 2017 by Sanborn Head and Associates, Inc. for the NH DES. This work was to confirm PFAS in groundwater detected as part of investigations in support of the ABCA completed in April 2018.

*Limited Subsurface Investigation Central Plating Site Off-Site Well Installation, Sampling and Analyses, 12 Westminster Street, Walpole, New Hampshire,* Ransom Consulting, Inc., dated February 23, 2018, conducted for Marianne Westberg, former property owner representative. This work was to assess the extent of off-site PFAS impacts to groundwater detected as part of investigations in support of the ABCA completed in April 2018 and the October 2017 Sanborn Head work.

*Supplemental Phase II Environmental Site Assessment and Analysis of Brownfields Cleanup Alternatives/Remedial Action Plan, 12 Westminster Street, Walpole, New Hampshire,* Ransom Consulting, Inc., dated April 25, 2018 through the SWRPC Brownfield Assessment Program under NH DES regulatory oversight. This supplemental Phase II ESA and ABCA (and remedial action plan) incorporated the findings of additional investigations conducted to better evaluate

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and quantify options and costs for remedial alternatives for the Site and to recommend a remedial approach to mitigate human health risks associated with impacted soils and to mitigate sources of ongoing groundwater impacts in compliance with NH DES rules.

In addition, subsurface investigations of an up-hydraulic gradient gasoline station and LUST site have been conducted for the owner of that property with NH DES regulatory oversight.

### **8. Enforcement or Other Actions**

There are no ongoing or anticipated environmental enforcement actions related to the Site. Past actions taken under the Clean Air Act by the U.S. EPA or by the NH DES were settled or resolved prior to, or as part of, CP facility operations closure in 2006/2007.

A December 21, 2018 NH DES *NH Brownfields Covenant Program Eligibility Determination* for the CP Site identified that the Town of Walpole has been deemed an eligible person under RSA 147-F. The determination was in part based upon a finding by the NH DES and NH DOJ that “The Property is not subject to a corrective action order under RSA 147-A, or any other compliance order issued under a state or federal environmental program.”

The NH DES Hazardous Waste Compliance Bureau was aware of no ongoing or anticipated environmental enforcement actions for the Site and provided documentation in support of this grant application for the following:

- Closeout for WMD 95-09 administrative order in February 9, 1998 “Notice of Compliance” from NH DES;
- Closeout for WMD 97-05 administrative order in the same February 9, 1998 “Notice of Compliance” from NH DES; and
- May 14, 2007 DES Documentation of Facility Closure of U.S. EPA ID # NHD001090398 subsequent to inspection of the facility.

There was a 2001 settlement between the former owner and the U.S. EPA pertaining to the Clean Air Act for the following for FRS ID: 110001123301:

- CCAA 113D1 Action for Penalty CAA 1997 01-1997-A055; and
- CCAA 113D1 Action for Penalty CAA 1999 01-1998-A028.

A Certificate of Title, dated October 3, 2018, prepared by Sheldon, Davis, Wells & Hockensmith, PC (SDWH) for the Town of Walpole Selectboard identified no environmental liens in the records reviewed at the “Cheshire County Registry of Deeds and Probate Superior Court records where applicable” as part of the search.

### **9. Sites Requiring a Property-Specific Determination**

Based on the available information, and the six classes of property that the guidelines indicate require a Property-Specific Determination, the Town of Walpole affirms that the site does not require a Property-Specific Determination.

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**10. Threshold Criteria Related to CERCLA/Petroleum Liability**

The Town of Walpole provides the following affirmations supporting that it qualifies as a Bona Fide Prospective Purchaser and meets criteria set forth in CERCLA § 101(40) criteria and CERCLA §107(r):

**(a) Information on the Property Acquisition**

- i. The Town of Walpole acquired the property (fee simple title) by means of negotiated purchase from the Estate of Nils A. M. Westberg on January 3, 2019.
- ii. Prior to the purchase of the property (a contractual relationship), the Town of Walpole has had no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or other potentially responsible parties) of the property including the Estate of Nils A.M. Westberg.

**(b) Pre-Purchase Inquiry**

- i. The Town of Walpole conducted a Phase I ESA on October 25, 2018 (less than 6 months before the purchase date) and in accordance with the requirements provided by the ASTM International Designation: E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2013* (ASTM E 1527-13), which meets the requirements of the U.S. EPA All Appropriate Inquiries (AAI), 40 CFR Part 312, through the SWRPC U.S. EPA Brownfield Assessment Program.
- ii. Previous Phase I ESAs were conducted for Nils A. M. Westberg (former owner) in 2006 by Stantec and for Bellows Town LLC (a prospective purchaser) in 2013 by Sanborn Head and Associates, Inc.
- iii. Phase II ESAs (or equivalent) were conducted as listed in Item 7., above.
- iv. The Phase I ESA prepared on behalf of the Town of Walpole was conducted by Steven Rickerich P.G., Stephen Dyer P.E. and Bonnie Best of Ransom Consulting, Inc., the Qualified Environmental Professional (QEP) for the SWRPC. The authors individually meet the definition of an Environmental Professional as defined in §312.10 of 40 CFR 312, and collectively have more 65 years of pertinent experience.

**(c) Timing and/or Contribution Toward Hazardous Substances Disposal**

- i. All disposal of hazardous substances at the site occurred before the Town of Walpole acquired the Site.
- ii. The Town of Walpole has not, at any time, arranged for the disposal of hazardous substances at the site nor transported hazardous substances to the Site.
- iii. The Town of Walpole is not liable in any way for contamination at the Site or affiliated with any other person potentially liable for the contamination.
- iv. The Town of Walpole has not caused or contributed to any release of hazardous substances at the Site.

**(d) Post-Acquisition Uses**

- i. The Town of Walpole is not actively using the property, nor are others authorized to use the property and none are doing so, other than for incidental parking in asphalt-paved areas.

**(e) Continuing Obligations**

As the new owner of the property, the Town of Walpole is committed to:

- i. stopping any continuing releases;

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- ii. preventing any threatened future release; and
- iii. preventing or limiting exposure to any previously released hazardous substance.

Since acquiring the property in early January 2019, the Town has obtained quotes to install a fence to restrict public access to metals-impacted soils on the interior of the Site, and will be contracting to have the fence installed.

The Town will be shutting off municipal water service to the Site building to eliminate the possibility of a failed water line flooding the interior of the building.

The Town has prohibited the staging of plowed snow on the Site to reduce precipitation/water infiltration in unpaved areas.

The Town of Walpole will conduct groundwater quality monitoring, and similar activities as may be required by the NH DES.

Furthermore, the Town of Walpole provides the following affirmations:

- i. The Town of Walpole attests that it shall comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the site;
- ii. The Town of Walpole attests that it shall not impede performance of a response action or natural resource restoration;
- iii. The Town of Walpole shall provide full cooperation, assistance, and access to authorized persons;
- iv. The Town of Walpole attests that it shall comply with any CERCLA or other information requests and administrative subpoenas in connection with the property; and
- v. The Town of Walpole shall provide all legally required notices in connection with the property.

**11. Cleanup Authority and Oversight Structure**

- a. The Town of Walpole, through its designated Town Project Director (Selectboard Chair Peggy Pschirrer) and Town support staff (Director of Finance, Treasure and Assistant Treasurer, and Manager of Administration) will administer the grant. The Town Project Director will: develop, organize, and administer programmatic and cleanup activities; assemble a Brownfield Cleanup Task Force comprised of Town, SWRPC, U.S. EPA, and NH DES staff and community stakeholders; and select a QEP through a fair and competitive process in accordance with all applicable Federal regulations, including 40 CFR 30 and 2 CFR 200.317 through 200.326, and State and Town requirements. Selection of a cleanup contractor will be by similar means, using bid specifications and a request for proposal and qualifications prepared by the QEP with selection achieved through a fair and competitive process and in accordance with all applicable Federal, State, and Town requirements.
- b. Subsequent to submitting its completed application, the Town of Walpole was notified in NH DES correspondence dated December 21, 2018, that the Town of Walpole is enrolled in the New Hampshire Brownfields Covenant Program as a program participant for the CP Site.

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- c. The Town has commitments from abutters in support of the project. Access to the Site may require transit through privately owned parking lots and will be through established easements and ROWs by the cleanup contractor. Access commitments have been discussed and agreed to in concept by abutters the Walpole Foundation and Mascoma Bank, with any necessary formal agreements to be in-place before Site work begins.

**12. Community Notification**

**a. Draft Analysis of Brownfield Cleanup Alternatives**

A draft ABCA was made available for public review and comment and is included as an attachment to the Proposal (attached). The ABCA summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered (including information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness for each alternative); and
- the proposed cleanup.

**b. Community Notification Ad**

A community notification advertisement was placed on the Town of Walpole, NH website on January 2, 2019, on the Walpolean blog on January 9, 2019, a posted paper flyer on January 2, 2019, and in the Keene Sentinel on January 9, 2019 stating:

- that a copy of the grant proposal, including the draft ABCA(s), is available for public review and comment;
- how to comment on the draft proposal;
- where the draft proposal is located; and
- the date and time of a public meeting (January 17, 2019).

**c. Public Meeting**

The public meeting was held on January 17, 2019 at the Town Hall, in Walpole, New Hampshire.

As required, attached to the Proposal are:

- the comments or a summary of the public comments received;
- the Town of Walpole's response to those comments;
- meeting notes or a summary of the public meeting(s); and
- meeting sign-in sheets.

**d. Submission of Community Notification Documents**

As required and noted above in the applicable sections, attached to the Proposal (as Threshold Criteria - Attachment 2) are:

- a copy of the draft ABCA(s);
- a copy of the ad (or equivalent) that demonstrates notification to the public and solicitation for comments on the proposal;
- the comments or a summary of the comments received;

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- the applicant’s response to those public comments;
- meeting notes or summary from the public meeting(s); and
- meeting sign-in sheets.

**13. Statutory Cost Share**

- a. For this \$730,000 cleanup project, a grant in the amount of \$500,000 is being sought. If all or some of the Town’s Hardship Waiver Request is not approved by the U.S. EPA, then the Town of Walpole commits to the following 20% (\$100,000) statutory cost share, albeit to the detriment of other municipal infrastructure projects anticipated in the same time window:
- b. Town Project Programmatic Costs personnel costs and supplies expenses (\$17,105, estimated);
- c. Town Police Department service/equipment hourly fees for police detail (car and cruiser) for security services and for Site/village traffic control (4 weeks) as trucks enter and leave the Site via village roads (\$16,700, estimated);
- d. Town Highway Department equipment plus operator fees and backfill material costs for the transportation and placement of clean backfill once the Site has been remediated (\$50,775, estimated). \$11,660 of this task total is for rental cost and materials purchase;
- e. In addition to the above, payment of cost-share/match from dedicated funds for the balance (\$15,420 estimated); and
- f. No administrative fees (direct or indirect) have been budgeted for cost share or reimbursement.

Note that the Town secured \$175,000 from the estate of the former (deceased) Site owner as part of the property acquisition which are being held in escrow for cleanup costs and continuing obligation costs (long term monitoring costs, additional requirements in the future relative to PFAS impacts) for the Site. This escrow will help fund the Town’s out-of-pocket match costs (\$11,660 + \$15,420 = \$27,080 estimated; with escrow funds earmarked for this purpose: \$30,000) with the balance intended to meet the continuing environmental obligation costs.

- g. The Town is seeking a waiver of the match in an attached Hardship Waiver Request as Threshold Criteria – Attachment 3.

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**Threshold Criteria - Attachment 1**  
**Copy of Property Deed Documenting Current Property Ownership**

Upon Recording Return to:  
Frasca No.293



LCHIP CHA81457 25.00

**QUITCLAIM DEED**

RSA 78-B:2, I- Exception to Real Estate Transfer Tax \$0.00 EXEMPT

**KNOW ALL MEN BY THESE PRESENTS** That I, **Marianne Westberg**, of 500 Cromwell Court, County of Middlesex and State of Connecticut, 06475, Administrator of the Estate of Nils A. Westberg, by License, Order, and the power conferred by the 8<sup>th</sup> Circuit - Probate Division – Cheshire County, Docket #313-2015-ET-00514, and by every other power, for consideration paid, grants to **The Town of Walpole, a political subdivision of the State of New Hampshire, acting by and through its duly authorized Selectboard**, with an address of 34 Elm Street, Walpole, County of Cheshire and State of New Hampshire 03608, WITH Quitclaim Covenants, the following described three tracts (3) tracts or parcels of land situated in Walpole, Cheshire County, New Hampshire, more particularly described as follows:

TRACT 1:

A certain tract of land, with the buildings thereon, situate in Walpole, County of Cheshire and State of New Hampshire, bounded and described as follows:

Beginning at an iron pin situated in the easterly line of land now or formerly of Boynton at the northwest corner of other land now or formerly of Galloway, being the southwest corner of the premises herein conveyed;

Thence, northerly along said Boynton land one hundred seventeen (117) feet, more or less, to an iron pin;

Thence, easterly along land now or formerly of Larson sixty-nine (69) feet, more or less, to land now or formerly of Bridge Fuel and Grain;

Thence, S. 21° 55' W. one hundred nineteen (119) feet, more or less, along said Bridge land to a stone bound at land now or formerly of the Walpole Fire District;

Thence, N. 70° 35' W. seventy and five tenths (70.5) feet, more or less, to the iron pin at the point of beginning.

Also conveying a right of way twelve (12) feet in width from Westminster Street to the premises herein conveyed, which right of way is a portion of the land conveyed by Morton to Galloway by deed dated December 8, 1948 and recorded in Vol 547, Page 284 of the Cheshire County Register of Deeds.

Subject to the right of Boynton to use the right of way along the southerly twenty-five (25) foot portion of the westerly line of the property.

Together with water and sewer line right of way over other land now or formerly of Galloway.

Reserving to Galloway the right to cross the southwestern portion of the above described property for the purpose of access to the rear door at the building directly south of the above described property.

TRACT 2:

A certain tract or parcel of land with the buildings thereon, situate in Walpole, in the County of Cheshire, State of New Hampshire, bounded and described as follows:

Beginning at a stone post on land now or formerly of Richard Boynton at a point 98.1 feet from the southwest corner of other land of Boynton, being the southwest corner of the land herein conveyed;

Thence, northerly along land of said Boynton 52.25 feet to a stone post at other land of Central Plating, Inc.;

Thence, easterly on said Central Plating, Inc.'s other land 31 feet 10 inches to an iron pin;

Thence, southerly in a parallel line with the first mentioned bound 52.25 feet to an iron pin at land of said Boynton;

Thence, westerly along said Boynton's land 31 feet 10 inches to the point of beginning.

Together with all rights of way which the grantor may have to said tract of land.

Meaning and intending to describe and convey all the same premises conveyed to **Nils A. M. Westberg** by Warranty Deed of **Central Plating, Inc.**, dated February 2, 1989 and recorded in the Cheshire County Registry of Deeds at Book 1278, Page 571. See Also Quitclaim deed to **Nils A. M. Westberg** from **Timothy Callahan** dated April 16, 2002 and recorded in the Cheshire County Registry of Deeds at Book 1889, Page 425.

TRACT 3:

A certain tract or parcel of land situate off of Westminster Street in Walpole, Cheshire County, New Hampshire and shown on plan entitled "LANDS OF NILS A. M. WESTBERG & TIMOTHY CALLAHAN, D/B/A WESTBERG AND CALLAHAN REAL ESTATE, TO BE ANNEXED TO LANDS OF NILS A. M. WESTBERG & TIMOTHY CALLAHAN, WESTMINSTER STREET, WALPOLE, NEW HAMPSHIRE" by DiBernardo Associates dated

November 6, 2001, Scale 1" = 10', recorded in Cheshire County Registry of Deeds, Cabinet 12, Drawer 7, Plan No. 69, ("Plan"), more particularly bounded and described as follows:

Beginning at a point at the southeasterly corner of land of the Grantee and northerly sideline of land now or formerly of Thomas P. Murray, being Tax Map 20, Lot 65 as shown on said Plan;

Thence North 25° 46' 07" East 57.20 feet along the easterly sideline of land, formerly of Westberg and Callahan to a point on the southerly sideline of other land formerly of Westberg and Callahan, being Tax Map 20, Lot 66;

Thence South 65° 00' 32" East 15.00 feet along the southerly sideline of other land formerly of Westberg and Callahan to a point at the northwesterly corner of the "Old Fire Station" property, so-called;

Thence South 25° 46' 07" West 57.70 feet along the westerly sideline of the Old Fire Station property to a point;

Thence North 63° 06' 53" West 15 feet along the Old Fire Station property and land now or formerly of Thomas P. Murray to the point of beginning.

Being approximately 861.6 square feet.

Subject to a right of way for the benefit of the remaining land of the Grantor, being the "Old Fire Station" property as shown on said Plan. The right of way shall be over the within described parcel, in order to allow access to and egress from the northerly portion of the Old Fire Station property to the southerly portion of the Old Fire Station property, for all reasonable purposes, by pedestrians, vehicles, equipment and machinery.

This easement shall run with the land and be binding upon the heirs, successors and assigns of the Grantor and Grantee herein.

Releasing and discharging, and intentionally not conveying, any and all rights of way and easements which may be appurtenant to the within described premises, including but not limited to those rights of way as described in Quitclaim Deed from Nils A.M. Westberg to Nils A.M. Westberg dated April 11, 2002 and recorded at Book 1889, Page 431 of the Cheshire County Registry of Deeds.

Subject to Easement and Release of Easement as shown in Quitclaim Deed from Nils A. M. Westberg to Nils A. M. Westberg dated April 11, 2002 and recorded in Book 1889, 434 of the Cheshire County Registry of Deeds.

Witness my hand this 2<sup>nd</sup> day of January, ~~2018~~ 2019

Robbie A Marshall  
Witness

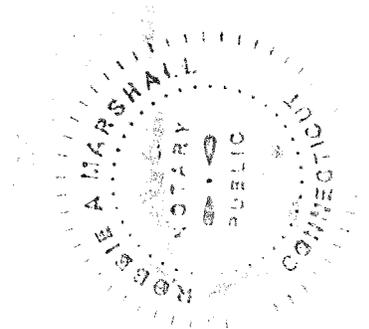
Marianne Westberg  
**Marianne Westberg, Administrator of the  
Estate of Nils A. Westberg**

STATE OF Connecticut  
COUNTY OF Middlesex

The foregoing instrument was acknowledged before me this 2<sup>nd</sup> day of January, ~~2018~~ 2019 by **Marianne Westberg**, in her capacity as Administrator of the Estate of Nils A. Westberg 2019

Robbie A Marshall  
Notary Public/Justice of the Peace

Robbie A Marshall  
Notary Public-Connecticut  
My Commission Expires  
May 31, 2020



**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Threshold Criteria - Attachment 2**  
**Community Notification Documents**

- Draft ABCA
- Copy of the Advertisement Demonstrating Public Notification and Solicitation for Comments
- Summary of Comments Received (*comments on Draft ABCA received*) and Applicant's Response to Public Comments (*response provided on Draft ABCA PDF*)
- Meeting Notes or Summary from the Public Meeting
- Meeting Sign-in Sheet

**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
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**Attachment 2**

Draft ABCA

**DRAFT**

**Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation Central Plating  
Site, 12 Westminster Street, Walpole, New Hampshire  
NH DES Site # 199806071**

**Prepared by the Town of Walpole**

**I. Introduction & Background**

**a. Site Location**

The Central Plating (CP) Site is located at 12 Westminster Street, Walpole, New Hampshire (herein referred to as “the Site”). The CP Site consists of two adjoining parcels (Lot 65 and 66 on Map 20), totaling 0.279 acres, within the center of Walpole Village and with no frontage on public streets.

Currently, other than a former “Wastewater Pre-Treatment Building”, the Site is unimproved and asphalt-paved surfaces and the sparsely vegetated footprint of the Former Industrial Building cover much of the remaining area. Land use in the vicinity of the Site is primarily commercial (offices, a bank, a restaurant, and gasoline station, and parking) and residential (adjoining apartment building and residences).

**b. Previous Site Use(s) and any previous cleanup/remediation**

Of the two industrial buildings that comprised the CP Site, only the garage-style, single-story Wastewater Pre-Treatment Building on Lot 65 remains. The “Former Industrial Building” located on Lot 66 was demolished in 2012. CP conducted electroplating of metal parts at the Site from 1963 until circa 2006. A New Hampshire Department of Environmental Services (NH DES) Hazardous Waste Declassification form, effective date April 1, 2006, documented closure of the business and attested to all waste being removed and cessation of facility operations. A January 27, 2007 NH DES inspection corroborated facility closure, discontinued operations and that all hazardous waste containers had been removed. A 500-gallon underground heating oil storage tank was removed in coordination with facility decommissioning.

CP’s metal finishing processes included anodizing of aluminum parts; chrome electroplating; nickel electroplating; chromate electropolishing; black oxide finishing; passivation; and a lacquer dip tank used to coat racks used in nickel plating. As shown on a 1990 layout schematic, a floor drain was located in the south end of the Former Industrial Building and wastewater was piped underground from sumps in the Former Industrial Building to sumps in the north end of the separate Wastewater Pre-Treatment Building. Wastewater from the operations of CP was directed to the municipal sewer system since the start of operations. Chrome fume suppressant(s) (commonly per- and poly-fluorinated alkyl substances (PFAS)) were reportedly used to control hazardous emission of hexavalent chrome fumes in the early 2000s and perhaps the late 1990s. In addition, Teflon coating (another PFAS source) was apparently one of the coatings applied based on records documenting a Teflon above-ground storage tank in the Former Industrial Building.

In anticipation of remediating and redeveloping the vacant and underutilized CP Site, the Town of Walpole acquired the two parcels on January 3, 2019 to become a keystone property in the Walpole Village business district commercial sustainability plan.

The Town has filed for inclusion of NH DES Site #199806071, Project #38111 (the CP Site) as a program participant into the NH DES Brownfields Covenant Program and was advised of acceptance into the program in December 21, 2018 correspondence.

**c. Site Assessment Findings**

Prior to taking ownership of the parcel, the Town nominated the Site for assessment under the Southwest Region Planning Commission (SWRPC) United States Environmental Protection Agency (U.S. EPA) Brownfields Assessment Program. An All Appropriate Inquiry (AAI)-compliant, ASTM Phase I Environmental Site Assessment (ESA), dated October 25, 2018, was conducted for the Site on behalf of the Town of Walpole through the SWRPC program. The most recent Phase I ESA actually post-dated several subsurface investigations as well as the preparation of an Analysis of Brownfields Cleanup Alternative (ABCA)/Remedial Action Plan (RAP).

The most recent Phase I ESA identified the following summary findings for the Site:

1. The Site was historically the location of an industrial electroplating facility dating from circa 1963 to circa 2006. Multiple releases of hazardous substances from the former industrial operations have adversely impacted Site soil and groundwater quality, with multiple contaminants (metals and PFAS) detected at concentrations above the applicable state standards.
2. In support of their management of the SWRPC Brownfields Assessment program, the NH DES reviewed the Draft RAP for the Site and provided comment on the DRAFT report. The final report addressed their comments, but the NH DES has yet to issue their formal approval of the final RAP. Ransom anticipates that the NH DES will be in general agreement with the RAP as proposed, perhaps with minor modifications.
3. An upgradient leaking underground storage tank (LUST) site has adversely impacted groundwater quality at the Site, resulting in the inclusions of the Site in the Groundwater Management Zone associated with this LUST property.

As documented in the Phase I ESA, previous subsurface investigations were conducted by a prospective purchaser, the SWRPC, the NH DES and the previous owner as recently as the winter/spring of 2018, to assess for and evaluate the potential for impacts to Site soils and groundwater on and adjoining the Site. Specifically, assessments included: delineating the extent of chromium (and other metals) impacted soil; characterizing soils and groundwater in proximity to former industrial building floor drains, spray painting, and exhaust fan vent outlets; and the former heating oil underground storage tank bed area; delineating the downgradient extent of groundwater impacts from the former Site industrial activities; assessing the extent to which off-site sources (gasoline and PFAS) contributed to Site groundwater quality impacts; and conducting a hazardous building materials inventory of the Wastewater Treatment Building.

As a result of the above investigations, which collectively included 35 borings and detailed contaminant spatial distribution, and 10 on-site and 3 off-site monitoring wells: (1) potential environmental impacts in the areas of the former underground heating oil tank, floor drains, spray painting area, and exhaust fan vent locations were dismissed;

(2) on-site recognized environmental conditions (RECs), namely soils and groundwater impacted with metals and/or PFAS, were confirmed that will require source reduction and groundwater monitoring and management; and (3) offsite sources of groundwater impacts were characterized. The confirmed on-site RECs include two areas of chromium (both hexavalent, i.e., carcinogenic, and trivalent) impacted soils: one estimated 550 ton mass of soils beneath the Former Industrial Building chromium and nickel plating areas that extends from the ground surface to over 17 feet below grade on Lot 66; and one estimated 215 ton mass of soils beneath several wastewater sumps under the Wastewater Pre-Treatment Building on Lot 65. For exposed dirt (i.e., the soils beneath the former plating area slab), contaminant concentrations of chromium were generally highest near the ground surface and are a human exposure risk through dust inhalation (if disturbed), dermal contact and ingestion. Contaminant concentrations in these near surface soils are more than 10 times higher than risk-based exposure standards. Groundwater impacts above regulatory standards (notably for chromium, nickel, cadmium and PFAS) were documented in groundwater samples from on Site monitoring wells and the plumes are inferred to extend off-site onto the west-abutting residential property. Two primary groundwater sources of PFAS are inferred, one of which is co-located with metals impacted soils in the former plating area, and the second in the area of the former aboveground Teflon storage tank, both on Lot 66.

Although no consumptive use of groundwater in proximity to the Site was identified and no indoor air risk is inferred for Site contaminants, contaminant source removal or containment is required to both mitigate human health contact risks for soils and to remove sources of ongoing groundwater quality impacts.

Hazardous building materials (asbestos), universal wastes (regulated light ballasts, light bulbs, and thermostat switches) and metals-rich dry granular residues (also containing arsenic, cadmium, chromium, nickel, lead, and zinc as well as cyanide) in the base of former waste water treatment sumps were identified as part of the Wastewater Pre-Treatment Building Hazardous Building Materials Inventory.

#### **d. Project Goal**

The redevelopment of the now vacant CP property will be an important economic development project for the Town of Walpole by helping sustain and allow for the growth of economic activity. Lots 65 and 66 are landlocked within the commercial /residential center of Walpole known as Walpole Village. The property will become a needed extension of an adjacent public parking lot supporting the Village and is estimated to have capacity to create up to 40 new public parking spaces in the Village area as well as a small green space area, and E-vehicle charging stations. Three restaurants, one grocery store, three retail shops, one bank, one health clinic, one mini mart and a bakery are all within the surrounding three blocks as well as numerous apartments, single residences and business offices all of which support an aging population in this rural and isolated New Hampshire community. On-street parking and the one existing small parking lot cannot and does not meet the needs of the numerous employees, businesses and residents.

## **II. Applicable Regulations and Cleanup Standards**

### **a. Cleanup Oversight Responsibility**

The cleanup will be overseen by the Town of Walpole's future-contracted Qualified Environmental Professional (QEP; i.e., a firm authorized by the State of New Hampshire to practice engineering, with a New Hampshire-licensed Professional Engineer in responsible charge), the NH DES (through the NH DES Brownfield Covenant Program for which the Town of Walpole has been determined to be an eligible person under RSA 147-F), and the U.S. EPA. In addition, all documents prepared for this Site are submitted to the NH DES and are publicly available through their online OneStop database under Site #199806071.

### **b. Cleanup Standards for major contaminants**

The Town currently anticipates that the current applicable (June 2015) Soil Remediation Standards codified in the Chapter Env-Or 600 will be the clean-up standards for regulated contaminants at the Site. Regulated contaminants could also be left in place at concentrations up to but not exceeding NH DES Risk Characterization and Management Policy Method 1 NH S-3 standards for the planned commercial use, if under an appropriate engineered cap and Activity and Use Restriction (AUR).

### **c. Laws & Regulations Applicable to the Cleanup**

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

Laws and regulations pertaining to Wastewater Pre-Treatment Building materials removal and disposal, including building contents and the abatement, demolition, and disposal of building materials:

1. 40 CFR Parts 260–273 and New Hampshire Code of Administrative Rules Chapter Env-Wm 1000 for management of Universal Wastes;
2. 40 CFR Part 761–Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions for management of materials with PCB concentrations  $\geq 50$  milligrams per kilogram (mg/kg);
3. Section 608, Title VI of the Clean Air Act Amendments of 1990 (CAA) for management of refrigerants (if applicable);
4. *Lead in Construction*, 29 CFR 1926.62, for management of lead painted surfaces;
5. New Hampshire RSA 141-E and the New Hampshire Code of Administrative Rules Chapter Env-A 1800, *Asbestos Management and Control* for management of asbestos containing materials;
6. New Hampshire Code of Administrative Rules Chapter Env-Hw 100-1200 Hazardous Waste Rules; and
7. New Hampshire Code of Administrative Rules Chapter Env-Sw 100-2100 Solid Waste Rules.

The primary regulatory requirements related to soils remediation at this Site are contained in New Hampshire administrative rules:

1. New Hampshire Code of Administrative Rules Chapter Env-Or 600 Contaminated Site Management;
2. New Hampshire Code of Administrative Rules Chapter Env-Hw 100-1200 Hazardous Waste Rules;
3. New Hampshire Code of Administrative Rules Chapter Env-Sw 100-2100 Solid Waste Rules; and
4. Federal stormwater regulations under the National Pollutant Discharge Elimination System (NPDES) program.

Also, all work is to comply with applicable Occupational Safety and Health Administration (OSHA) requirements, including, but not limited to: General Industry, Construction Industry (29 CFR 1926), Personal Protective Equipment (29 CFR 1910.132), Hazard Communication (29 CFR 1910.1200), Occupational Noise Exposure (29 CFR 1910.95), Respiratory Protection (29 CFR 1910.134), and Hazardous Waste Operations and Emergency Response standards (29 CFR 1910.120).

All appropriate permits (*e.g.*, notify before you dig, soil transport/disposal manifests, industrial indirect discharge permits for treated groundwater as may be required by Walpole or the municipal wastewater treatment facility located across the Connecticut River in Vermont) will be obtained prior to the work commencing.

In addition, the work will be implemented in accordance with U.S. EPA's Clean and Greener Policy for Contaminated Sites, Revised February 2012 (Green Remediation Principals) to the extent practicable.

### **III. Evaluation of Cleanup Alternatives**

#### **a. Cleanup Alternatives Considered**

Three remedial alternatives were considered for the Site to remediate soils contaminated by plating processes, and to remediate groundwater at the Site, including:

**Alternative #1:** "Monitored Natural Attenuation" (MNA);

**Alternative #2:** "Excavate and Dispose of Soils with Soil Remediation Standard (SRS) Exceedances;" and

**Alternative #3:** "Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place."

Alternative #1: A MNA (No Action) alternative signifies that no remediation activities would be conducted at the Site, other than: (1) the building on-site would be abated of hazardous materials and the sump's contents removed and properly disposed of, and the building demolished and properly disposed of; and (2) the removal (and proper waste characterization and disposal) of the upper 1.5 feet of soils over non-paved areas to eliminate soil exposure risk and to construct a parking lot (the "pavement section"). Periodic sampling of the groundwater would be required

over a long time period as attenuation through mobilization and dilution slowly reduces the residual contaminant source(s) in contact with groundwater. Remaining soils would be managed in place under an AUR. Groundwater monitoring under a groundwater management permit would be required until applicable standards are met.

Alternative #2: As part of the “Excavate and Dispose of Soils with SRS Exceedances” alternative the building on-site would be abated of hazardous materials and the sump’s contents removed and properly disposed of, and the building demolished and properly disposed of to access underlying soils. Regulated soils with contaminant concentrations greater than soil remediation standards would be removed from the Wastewater Pre-Treatment Building sumps area and the plating area, stockpiled into suspect hazardous soils and possible non-hazardous soils, tested for waste characterization parameters, and disposed of at a facility permitted to accept the waste based on hazardous waste characteristic. Site non-regulated soils would be reused as backfill in remedial excavations on the lot of origin and beneath the parking lot pavement section, but above the groundwater table. Groundwater monitoring under a groundwater management permit would be required until applicable standards are met.

Alternative #3: The “Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place” alternative is similar to Alternative #2 with the exception that only those shallow soils needed to construct the parking lot and those deeper soils that are likely to act as an ongoing source to groundwater are to be excavated for disposal. As part of this alternative the building on-site would be abated of hazardous materials and the sump’s contents removed and properly disposed of, and the building demolished and properly disposed of to access underlying soils. Regulated soils with impacts greater than a leaching-based Site-specific standard would be removed from the plating line area and all soils from beneath the Wastewater Pre-Treatment Building sumps would be removed; stockpiled into suspect hazardous soils, and possible non-hazardous soils; tested for waste characterization parameters; and disposed of at a facility permitted to accept the waste, based on hazardous waste characteristic. Site non-regulated soils would be reused as backfill in remedial excavations on the lot of origin and beneath the pavement section, but above the groundwater table. Groundwater monitoring under a groundwater management permit would be required until applicable standards are met.

#### **b. Cost Estimate of Cleanup Alternatives**

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

##### Effectiveness

Alternative #1: The MNA (No Action) alternative is not fully protective of human health and the environment and does not meet threshold criteria because it does not address ongoing sources to groundwater impacts. The MNA alternative achieves some reduction of the toxicity, mobility, and volume of the hazardous substances present at the Site by removal of the building and associated wastes and near-surface soils to construct the asphalt-paved parking lot.

Alternative #2: The Excavate and Dispose of Soils with SRS Exceedances remediation alternative can achieve significant reduction of the residual volume of impacted soil at the Site, in-turn decreasing the duration of groundwater impacts due to the presence of metals in the sump and plating areas and PFAS in the plating area. Removal of Site impacted soil and on-Site relocation and controlled placement and management of unregulated soils under the parking lot and above the groundwater table would further reduce or eliminate the risk of exposure to trespassers and potential workers associated with Site redevelopment or ongoing maintenance.

Note that the NH DES has concurred that, at this time, groundwater monitoring only would be required for the former Teflon tank PFAS-impacted area as there are no New Hampshire soil remediation standards for PFAS.

Alternative #3: The Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place remediation alternative can achieve significant reduction of the residual volume of impacted soil at the Site, in-turn decreasing the time period (as measured in years) that groundwater contaminant concentrations are above Ambient Groundwater Quality Standards (AGQS). Removal or on-Site relocation and management under an AUR (and beneath the paved parking lot) of Site impacted soil with concentrations above SRSs would reduce or eliminate the risk of exposure to trespassers and potential workers associated with Site redevelopment or ongoing maintenance. Following removal of the source of groundwater impacts, significant reductions in overburden groundwater metals and PFAS concentrations should be an outcome in near term for the Site. However, it is anticipated that groundwater impacts will remain for a number of years since this alternative would leave in place marginally impacted soils at concentrations less than a Site-specific leaching-based standard to be determined, and the reliability of the Site-specific standard is not assured.

Due to the upland setting and lack of potentially-threatening surface water features in the area, climate change effects from rising sea level and/or changing flood zones are not anticipated to represent a major threat. As such, the primary climate change concerns would be associated with extreme weather, increased rainfall, and rising groundwater tables. For this Site and the planned work (any of the three alternatives), effects of extreme weather can be mitigated by industry standard engineering controls during construction. A rising water table due to increased precipitation would be most likely to adversely impact Alternative #1 and favor Alternatives #2 and #3, because the later alternatives would focus on removing source mass at depths that extend slightly into the groundwater table, whereas Alternative #1 does not.

### Implementability

Alternative #1: The MNA (No Action) alternative is the simplest to implement because no remediation-specific actions will be conducted other than those required to demolish the building and construct the parking lot and to conduct ongoing monitoring of groundwater quality.

Alternative #2: The Excavate and Dispose of Soils with SRS Exceedances remediation alternative includes the actions needed to demolish the building, identical to Alternative #1. The excavation of impacted soils to up to about 17 feet below grade and testing and off-site disposal of soils is technically feasible, as is ongoing monitoring of groundwater quality for a reduced time period.

Alternative #3: The Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place remediation alternative includes the actions needed to demolish the building, identical to Alternative #1, and the excavation/disposal of impacted soils at the Site is technically feasible; however, the Site investigations were unable to identify a leaching-based standard at a concentration greater than the SRS that would provide confidence in reducing future impacts to groundwater. Therefore, the intended benefit of targeted soils removal, namely, to reduce the groundwater monitoring time period, may not be reliably achieved if impacted soils at concentrations above SRSs are left in place. Therefore, although the reduced soils disposal volume (and cost) is financially desirable, this alternative does not appear to be practical from a technical implementation perspective.

## Cost

It is estimated that costs under Alternative #1 MNA (No Action) related to building removal, and surface soils removal to accommodate the paved parking area and provide a cap, is \$225,000. This cost does not include ongoing groundwater monitoring.

Alternative #2, Excavate and Dispose of Soils with SRS Exceedances, costs are estimated to be \$730,000. This cost does not include ongoing groundwater quality monitoring.

Alternative #3, Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place, is estimated to cost roughly \$450,000 (assumes a 50% reduction in soils removal and disposal), assuming all targeted remediation soils are hazardous. This cost does not include ongoing groundwater quality monitoring.

### **c. Recommended Cleanup Alternative**

The recommended cleanup alternative is Alternative #2: “Excavate and Dispose of Soils with SRS Exceedances” as this alternative protects human health and the environment and is effective, technically feasible, and practical. Because this alternative best meets the evaluation criteria and is not cost-prohibitive, this alternative has been selected for implementation at the Site.

Alternative #1, MNA (No Action), cannot be recommended since it does not specifically address source area mass with contaminant concentrations above regulatory standards; i.e., it does not reduce the ongoing contaminant sources to groundwater in compliance with Env-Or 600.

Alternative #3, Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place, is less expensive; however, establishing an effective leaching-based standard at which soils can be left in place without ongoing groundwater impact has sufficient uncertainty and casts considerable doubt of achieving the goal of adequate source reduction. This negates some or all of the cost benefit (i.e. this approach could require long-term monitoring of groundwater) and, therefore, may not achieve Env-Or 600 required clean-up goals.

Remedial Alternatives #1 and #3 have significant shortcomings and/or uncertainty toward meeting Site clean-up goals. Remedial Alternative #2 best meets all goals including attainment of source area (impacted soils) clean-up standards, and is not cost prohibitive and, therefore, is the recommended alternative.

**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Attachment 2**

Copy of the Advertisement Demonstrating Public Notification and Solicitation for Comments

## Selectboard Public Hearing Re: Proposed Brownfields Cleanup Grant

1/2/2019

The Selectboard of the Town of Walpole will hold a public hearing on Thursday, January 17, 2019 at 6:00pm in the Selectboard Office of the Walpole Town Hall at 34 Elm Street for the purpose of reviewing a draft proposal for a 2019 EPA Brownfields Cleanup Grant. The Proposed Brownfields Cleanup Grant is for Map 20 Lots 65 and 66, the former Central Plating site formerly owned by the Nils Westberg Estate, now owned by the Town of Walpole, NH. Residents may read the draft proposal at the Town Hall during regular business hours or at online at <https://www.walpolenh.us/town-news>. Copies of the proposal including the draft ABCA(s) will be available at the hearing. Comments on the draft proposal including the draft ABCA(s) will be recorded. Attendees will be requested to sign-in. Written comments will be accepted at the Selectboard Office through 1/24/19. Individuals having special needs covered by the Americans with Disabilities Act should notify the Selectboard Office at least seven days prior to the hearing by calling 603-756-3672 or e-mailing [sdowning@walpolenh.us](mailto:sdowning@walpolenh.us)

Sarah Downing

On behalf of the Walpole Selectboard

[Link to Analysis of Brownfields Cleanup Alternatives \(ABCA\(s\)\) - Preliminary Explanation](#)



**From:** [The Walpolean](#)  
**To:** [sdowning@walpolenh.us](mailto:sdowning@walpolenh.us)  
**Subject:** [New post] Public Hearing – 1/17/18  
**Date:** Wednesday, January 9, 2019 1:14:46 PM

Respond to this post by replying above this line

New post on **The Walpolean**



## Public Hearing – 1/17/18

by [Lil](#)

Walpole Selectboard

Notice of Public Hearing

Regarding Proposed Brownfields Cleanup Grant

The Selectboard of the Town of Walpole will hold a public hearing [on Thursday, January 17, 2019 at 6:00pm](#) in the Selectboard Office of the Walpole Town Hall at [34 Elm Street](#) for the purpose of reviewing a draft proposal for a 2019 EPA Brownfields Cleanup Grant. The Proposed Brownfields Cleanup Grant is for Map 20 Lots 65 and 66, the former Central Plating site formerly owned by [the Nils Westberg Estate](#), now owned by the Town of Walpole, NH. Residents may read the draft proposal at the Town Hall during regular business hours or at online at <https://www.walpolenh.us/town-news>. Copies of the proposal including the draft ABCA(s) will be available at the hearing. Comments on the draft proposal including the draft ABCA(s) will be recorded. Attendees will be requested to sign-in. Written comments will be accepted at the Selectboard Office [through 1/24/19](#). Individuals having special needs covered by the Americans with Disabilities Act should notify the Selectboard Office at least seven days prior to the hearing by calling [603-756-3672](tel:603-756-3672) or e-mailing [sdowning@walpolenh.us](mailto:sdowning@walpolenh.us)

Sarah Downing

On behalf of the Walpole Selectboard

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[Lil](#) | 01/09/2019 at 2:14 PM | Categories: [Uncategorized](#) | URL: <https://wp.me/p3wabC-1s4>

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# Town of Walpole

## Public Hearing

The Selectboard of the Town of Walpole will hold a public hearing on Thursday, January 17, 2019 at 6:00pm in the Selectboard Office of the Walpole Town Hall for the purpose of reviewing a draft proposal including the draft ABCA(s) for a 2019 EPA Brownfields Cleanup Grant.

The Proposed Brownfields Cleanup Grant is for Map 20 Lots 65 and 66, the former Central Plating Site formerly owned by the Nils Westberg Estate, now owned by the Town of Walpole, NH.

Residents may read the draft proposal including the draft ABCA(s) at the Town Hall prior to the public hearing or online at <https://www.walpolenh.us/town-news>. Copies of the proposal including the draft ABCA(s) will be available at the hearing.

Comments on the draft proposal including the draft ABCA(s) will be recorded. Attendees will be requested to sign-in. Written comments will be accepted at the Selectboard Office through 1/24/2019.



# Classified

603-352-7040  
classified@keenesentinel.com  
SentinelSource.com

## Employment

### Admin/Cust Service



#### Clerical Assistant

(Job code #18058) - \$16.88 per hour  
The Vermont Judiciary is recruiting for 2 long term temporary Docket Clerk positions in Brattleboro. Up to 40 hours per week, specializing in customer service, records keeping and data entry involving one or more docket areas. High School graduate and two years of clerical, or data entry experience required. Starting at \$16.66 per hour. Open until filled. Equal opportunity employer. Candidates shall submit a complete and up-to-date Judicial Branch Application and resume. An electronic version of the application may be found at: <https://www.vermontjudiciary.org/employment-opportunities/staff-openings>

**Liberty Tax Service**  
Tax Preparers Wanted. No experience needed! Will train. (603) 352-1300

## Sedans

Why not place a photo of your vehicle for sale?



Then readers will really pay attention to your ad!

Call The Keene Sentinel Classified Department NOW!  
**603-352-7040**

## Campers/RVs



#### 2007 Keystone Montana 5th wheel camper

4 slide outs, king size bed, central vac, fireplace etc. \$10,000 or best offer. Or trade for plow truck. **603-876-9999**

## Merchandise

### Antiques



WANT YOUR AD TO REALLY STAND OUT?

The Keene Sentinel has a lot of attention-getting images available to place in your ad.

Ask us, we'll be happy to help you!

**603-352-7040**

### Artesian Wells



#### The Keene Sentinel

has a lot of ways to point consumers to your business. Let us help you show them the way!  
**603-352-7040**

### Firewood

**SEASONED FIRE WOOD**  
Cut, split and delivered. Green wood also available. Call for pricing and delivery. (603) 313-1788

### Lost & Found

**FOUND**  
Christmas Day on Rte 12, Lower Main between Tire Warehouse & Sam's: small yellow mini backpack Call 352-2454

### Home Furnishings

**USA Made Wesley Allen**  
High quality bar stools. Brand new-never used! \$350+ cost PER STOOL. High end product. Have 4 avail. \$250 each min. of 2. Ask for Harry 603-446-7778

### Merchandise



**Bill's Trading Post, Inc.**  
608 W. Swanzey Rd. Hours: Mon, Weds-Sun. 10am - 5pm, Closed Tues. General Merchandise **603-352-3457**

**WANTED: COSTUME JEWELRY**  
piece or a lot! Call: 603-352-3457

### Merchandise Wanted

**\*\*Always buying & selling**  
old coins, silver, gold & diamonds. Colonial Coin, 26 Canada St., Marlborough, NH. Open Tues. through Sat., 10-4. **603-876-4462**

## Services

### Elderly Assist. Needed

#### LOOKING FOR IN-HOME ALS CARE

Looking for a caregiver to join the team caring for our mother, who has advanced ALS. This person would be the primary caregiver on three consecutive days each week and would be expected to stay overnight each night, in conjunction with an awake overnight caregiver. Medical background is desirable, but intense training will be provided. Must be caring, reliable and able to work closely with others. Please contact gretchen@vpcompanies.com if interested.

### Professional Services

**Chris Lane Enterprises, LLC**  
Tree work, storm damage cleanup, crane work, stump grinding, pruning. Fully insured. Free est. (603) 355-0208 [ChrisLaneEnterprises.com](http://ChrisLaneEnterprises.com)

### Yard & Garden

Cleanups, sanding, snow plowing, snow blowing and shoveling. Residential & Commercial. Home-Land Landscaping. **603-827-3019**

## Health

### Happy Ads

The most reliable way to predict the future is to create it. Participate in life instead of just watching it pass you by.

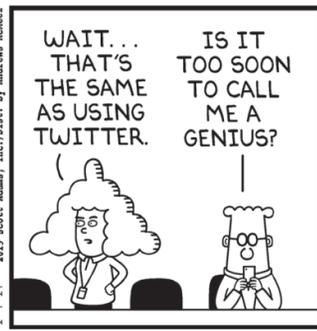
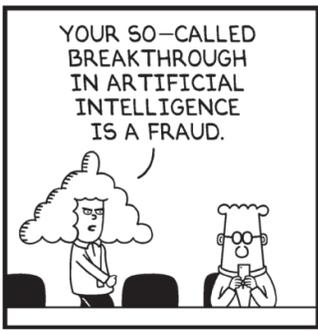
Would you like to spread a little happiness?

Birth? Wedding? Graduation? Anniversary?



CALL 603-352-7040 to place your happy ad in the Keene Sentinel!

## DILBERT



## Pets

### Pets



Bubba

Hi everyone! My name is Bubba! I am an active, high energy boy, who needs a family that has plenty of time for me. I need some training, but don't let that stop you from falling in love with me. Teaching me new tricks will only make our bond stronger! I am looking for a family that will be able to give me the attention I need, making sure that I can get plenty of exercise, but also can help me learn how to spend down time being calm and relaxed. I enjoy the company of other dogs and love to play with toys. If you think I may be just the dog you have been patiently waiting for, please ask my friends at MHS for more information!

You can visit us or our many great pets for adoption at our Adoption Center located at 101 West Swanzey Road just outside of Keene on Route 10-South. Business hours are Wednesday through Friday from Noon until 6PM and Saturday through Sunday from 11AM to 4PM. There are many homeless animals at MHS that need loving forever homes. For more information please contact us online or call us at 603-352-9011 ext. 101.

**PUPPIES FOR SALE**  
Golden Retriever puppies, AKC registered. Available Feb. 12th. Price \$1500. Call 603-529-1579 [www.robnygoldens.com](http://www.robnygoldens.com)

### Lost & Found

**FOUND:** Lady's Silver Ring in the vicinity of St. Margaret Mary Church, 33 Arch Street, Keene. Was buried in the dirt, it may have been there awhile. Call: 603 399-4340 and leave a message.

## Notices

### Legals

#### PUBLIC NOTICE

The Prospect-Woodward Home d/b/a Hillside Village Keene hereby notifies the public that it will be applying for a **Health Care License for a 20 bed nursing facility** to be part of the larger Hillside Village Continuing Care Retirement Community. Hillside Village Keene, a New Hampshire non-profit 501c3 corporation, operates a continuing care retirement community for individuals age 62 or older which is located in Keene, New Hampshire. Hillside Village seeks to provide quality continuing care to residents in well-designed surroundings and with services so that residents may enjoy an independent lifestyle, having the contentment of knowing that additional supportive services and care are available if ever needed.

#### PUBLIC NOTICE

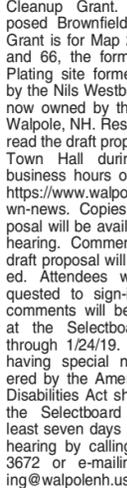
The Prospect-Woodward Home d/b/a Hillside Village Keene hereby notifies the public that it will be applying for a **Health Care License for a 61 bed supported residential care and memory care unit** to be part of the larger Hillside Village Continuing Care Retirement Community. Hillside Village Keene, a New Hampshire non-profit 501c3 corporation, operates a continuing care retirement community for individuals age 62 or older which is located in Keene, New Hampshire. Hillside Village seeks to provide quality continuing care to residents in well-designed surroundings and with services so that residents may enjoy an independent lifestyle, having the contentment of knowing that additional supportive services and care are available if ever needed.

## Legals

### Walpole Selectboard Notice of Public Hearing Regarding Proposed Brownfields Cleanup Grant

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Sarah Downing  
On behalf of the Walpole Selectboard



#### Notice of Public Hearing

A meeting of the Historic District Commission will be held on **Wed., Jan. 16, 2019 at 4:30 PM in the City Hall Committee Room, 2nd fl., 3 Washington Street, Keene, NH** to conduct a public hearing on the following:

**COA-2019-01 81 Court St. Joslin-Prouty House Renovations**  
Applicant KCS Architects, on behalf of owner NBA 81 Realty LLC, proposes renovations to the building exterior including removal of the unoriginal front porch structure and vinyl siding, restoration of the original siding and trim, construction of a new stoop and accessible ramp to match the Greek Revival style of the building, and restriping of the driveway and parking lot. The property is ranked as a Contributing Resource and is located at 81 Court Street (TMP# 568-044-000-000) in the Office District.

This application is available for public review in the Keene Community Development Dept., 4th floor City Hall, 3 Washington St. Keene, NH 03431

*Mari Brunner, Planning Technician*  
On behalf of the Historic District Commission

#### Town of Westmoreland, NH Planning Board Public Hearing

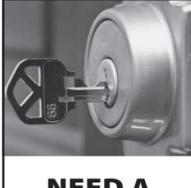
Per RSA 675:7, the Westmoreland Planning Board will hold a Public Hearing on Monday, January 21, 2019 at 6:30pm in the Town Hall, 780 Route 63, Westmoreland, NH to consider the following changes to the Zoning Ordinances: Definitions, Section: 205 Construction Approval, 206 Non-conforming Uses, 426 Roadside Stands, 438.9 Performance Standards, Tables 502-506, a proposed solar ordinance and changes to the Site Plan Review Checklist. Copies of the proposed changes are available for review at the Selectmen's Office during regular business hours. Elaine Moore, Clerk, Westmoreland Planning Board.

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(603) 352-3956 [jskpropertymanagement.com](mailto:jskpropertymanagement.com)  
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**Keene-Water St:** 2-bdrm 1000/mo  
**Swanzey-Main St:** 1-bdrm 995/mo

**Hinsdale: 1 bdrm \$850**  
2 bdrm \$1,030  
Heat & Hot Water included. Off Street parking. Call: (603) 762-2755

**Hinsdale: 2 bedrooms,**  
2<sup>nd</sup> floor, good refs. \$775/mo + util. & sec. dep. **603 354-4738**

**2<sup>nd</sup> flr.** large 2 bdrm. apt. private yard 10 min. to downtown Keene, ht., water, lawn care and plowing. Call: **603-352-6402**

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HOLLYBERRY  
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MONADNOCK  
ROLLING HILLS  
SUNRISE  
WATERVIEW

**LOCATION**  
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KEENE  
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HUDSON  
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HILLSBORO  
COLEBROOK  
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N. SWANZEY

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## Sedans



## Sedans

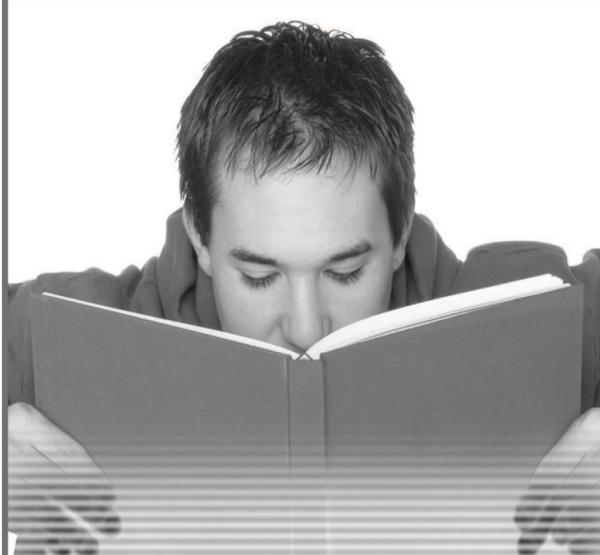
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**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Attachment 2**

Summary of Comments Received (*comments on Draft ABCA received*) and Applicant's  
Response to Public Comments (*response provided on Draft ABCA PDF*)

**DRAFT**

**Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation Central Plating Site, 12 Westminster Street, Walpole, New Hampshire  
NH DES Site # 199806071**

**Prepared by the Town of Walpole**

**I. Introduction & Background**

**a. Site Location**

The Central Plating (CP) Site is located at 12 Westminster Street, Walpole, New Hampshire (herein referred to as “the Site”).

**b. Previous Site Use(s) and any previous cleanup/remediation**

The CP Site consists of two adjoining parcels (Lot 65 and 66 on Map 20), totaling 0.279 acres, within the center of Walpole Village and with no frontage on public streets. Of the two industrial buildings that comprised the CP Site, only the garage-style, single-story “Wastewater Pre-Treatment Building” on Lot 65 remains. The “Former Industrial Building” located on Lot 66 was demolished in 2012. CP conducted electroplating of metal parts at the Site from 1963 until circa 2006. A New Hampshire Department of Environmental Services (NH DES) Hazardous Waste Declassification form, effective date April 1, 2006, documented closure of the business and attested to all waste being removed and cessation of facility operations. A January 27, 2007 NH DES inspection corroborated facility closure, discontinued operations and that all hazardous waste containers had been removed. A 500-gallon underground heating oil storage tank was removed in coordination with facility decommissioning.

CP’s metal finishing processes included anodizing of aluminum parts; chrome electroplating; nickel electroplating; chromate electropolishing; black oxide finishing; passivation; and a lacquer dip tank used to coat racks used in nickel plating. As shown on a 1990 layout schematic, a floor drain was located in the south end of the Former Industrial Building and wastewater was piped underground from sumps in the Former Industrial Building to sumps in the north end of the separate Wastewater Pre-Treatment Building. Wastewater from the operations of CP was directed to the municipal sewer system since the start of operations. Chrome fume suppressant(s) (commonly per- and poly-fluorinated alkyl substances (PFAS)) were reportedly used to control hazardous emission of hexavalent chrome fumes in the early 2000s and perhaps the late 1990s. In addition, Teflon coating (another PFAS source) was apparently one of the coatings applied based on records documenting a Teflon above-ground storage tank in the Former Industrial Building.

Currently, other than the Wastewater Pre-Treatment Building, the Site is unimproved and asphalt-paved surfaces and the sparsely vegetated footprint of the Former Industrial Building cover much of the remaining area. Land use in the vicinity of the Site is primarily commercial (offices, a bank, a restaurant, and gasoline station, and parking) and residential (adjoining apartment building and residences).

In anticipation of remediating the vacant and underutilized CP Site, the Town of Walpole acquired the two parcels on January 3, 2019 to become a keystone property in the

# Summary of Comments on TC-Attach 2.3 & 2.4.pdf

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Page: 1

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 Number: 1 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:15:33 PM

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For consideration

The Town will promote and facilitate community involvement with the environmental cleanup and site redevelopment project by performing targeted outreach to notify communities of the availability of this Draft ABCA; publishing a notice of availability of this Draft ABCA; and providing an opportunity for members of the public to comment on the ABCA in a public meeting.

The expected outcomes of the project include a Certificate of No Further Action to be issued by New Hampshire Department of Environmental Services.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:32:25 PM

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Alicia - This DRAFT ABCA is intended to conform with the example format and content provided by the EPA with a focus on being concise. Your comment is accurate and frequency of public meeting are discussed in the grant application. The expected outcome is a "certificate of completion", also noted in the application.

 Number: 2 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:22:20 PM

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I would move II of this up to 1.a.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:35:43 PM

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Alicia - This DRAFT ABCA is intended to conform with the example format and content provided by the EPA. Your comment is logical and appreciated and has been implemented.

 Number: 3 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:22:14 PM

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 Number: 4 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:21:05 PM

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 Number: 5 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:21:58 PM

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I would move II of this up to 1.a.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:36:09 PM

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Alicia - This DRAFT ABCA is intended to conform with the example format and content provided by the EPA. Your comment is logical and appreciated and has been implemented.

 Number: 6 Author: brd-aflammia Subject: Sticky Note Date: 1/28/2019 5:36:09 PM

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redeveloping and remediating

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:36:40 PM

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Edit made. Thank you.

Walpole Village business district <sup>2</sup> commercial sustainability plan. <sup>1</sup> The Town has filed for inclusion of NH DES Site #199806071, Project #38111 (the CP Site) as a program participant into the NH DES Brownfields Covenant Program and was advised of acceptance into the program in December 21, 2018 correspondence.

**c. Site Assessment Findings** <sup>3</sup>

Prior to taking ownership of the parcel, the Town nominated the Site for assessment under the Southwest Region Planning Commission (SWRPC) United States Environmental Protection Agency (U.S. EPA) Brownfields Assessment Program. An AAI-compliant, ASTM Phase I Environmental Site Assessment (ESA), dated October 25, 2018, was conducted for the Site on behalf of the Town of Walpole through the SWRPC program.

<sup>4</sup> <sup>5</sup> The ASTM Phase I ESA Report identified three recognized environmental conditions (RECs) for the Site:

1. The Site was historically the location of an industrial electroplating facility dating from circa 1963 to circa 2006. Multiple releases of hazardous substances from the former industrial operations have adversely impacted Site soil and groundwater quality, with multiple contaminants (metals and PFAS) detected at concentrations above the applicable state standards.
2. In support of their management of the SWRPC Brownfields Assessment program, the NH DES reviewed the Draft Remedial Action Plan (RAP) for the Site and provided comment on the DRAFT report. The final report addressed their comments, but the NH DES has yet to issue their formal approval of the final RAP. Ransom anticipates that the NH DES will be in general agreement with the RAP as proposed, perhaps with minor modifications.
3. An upgradient leaking underground storage tank (LUST) site has adversely impacted groundwater quality at the Site, resulting in the inclusions of the Site in the Groundwater Management Zone (GMZ) associated with this LUST property.

As documented in the Phase I ESA, previous subsurface investigations were conducted by a prospective purchaser, the SWRPC, the NH DES and the previous owner as recently as the winter/spring of 2018, to assess for and evaluate the potential for impacts to Site soils and groundwater on and adjoining the Site. Specifically, assessments included: delineating the extent of chromium (and other metals) impacted soil; characterizing soils and groundwater in proximity to former industrial building floor drains, spray painting, and exhaust fan vent outlets; and the former heating oil underground storage tank bed area; delineating the downgradient extent of groundwater impacts from the former Site industrial activities; assessing the extent to which off-site sources (gasoline and PFAS) contributed to Site groundwater quality impacts; and conducting a hazardous building materials inventory of the Wastewater Treatment Building.

As a result of the above investigations, which collectively included 35 borings and detailed contaminant spatial distribution, and 10 on-site and 3 off-site monitoring wells: (1) potential environmental impacts in the areas of the former underground heating oil tank, floor drains, spray painting area, and exhaust fan vent locations were dismissed; (2)

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 Number: 1 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:23:16 PM  
does such a plan exist?

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:38:37 PM  
The Town Master Plan is in the early stages of review and will speak to efforts to sustain village businesses.

---

 Number: 2 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:23:07 PM

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 Number: 3 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:29:59 PM  
"Summary of Environmental Conditions" would maybe be a better title - as so much work was done prior to the 2018 Phase I, it gets confusing reading about a RAP in a phase I as an REC, so a little intro into the previous work (dates, name of report, maybe why work was conducted, maybe not) could clear up the confusion.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:40:42 PM  
We're reluctant to changes headers as this DRAFT ABCA is modeled after the EPA example. We will look at ways to clarify the concerns expressed.

---

 Number: 4 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:41:36 PM  
I think this whole paragraph could be deleted as it just confuses the reader. The more relevant info is presented below it.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:42:21 PM  
We'll consider your recommendation and look to clarify sequencing of investigations as noted above.

---

 Number: 5 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:37:53 PM

1  
2 on-site RECs were confirmed that will require source reduction and groundwater monitoring and management; and (3) offsite sources of groundwater impacts were characterized. 4  
3 The confirmed on-site RECs include two areas of chromium (both hexavalent, i.e., carcinogenic, and trivalent) impacted soils: one estimated 550 ton mass of soils beneath the Former Industrial Building chromium and nickel plating areas that extends from the ground surface to over 17 feet below grade on Lot 66; and one estimated 215 ton mass of soils beneath several wastewater sumps under the Wastewater Pre-Treatment Building on Lot 65. For exposed dirt (i.e., the soils beneath the former plating area slab), contaminant concentrations of chromium were generally highest near the ground surface and are a human exposure risk through dust inhalation (if disturbed), dermal contact and ingestion. Contaminant concentrations in these near surface soils are more than 10 times higher than risk-based exposure standards. Groundwater impacts above regulatory standards (notably for chromium, nickel, cadmium and PFAS) were documented in groundwater samples from on Site monitoring wells and the plumes are inferred to extend off-site onto the west-abutting residential property. Two primary groundwater sources of PFAS are inferred, one of which is co-located with metals impacted soils in the former plating area, and the second in the area of the former aboveground Teflon storage tank, both on Lot 66. 5

6 Although no consumptive use of groundwater in proximity to the Site was identified and no indoor air risk is inferred for Site contaminants, contaminant source removal or containment is required to both mitigate human health contact risks for soils and to remove sources of ongoing groundwater quality impacts.

Hazardous building materials (asbestos), universal wastes (regulated light ballasts, light bulbs, and thermostat switches) and metals-rich dry granular residues (also containing arsenic, cadmium, chromium, nickel, lead, and zinc as well as cyanide) in the base of former waste water treatment sumps were identified as part of the Wastewater Pre-Treatment Building Hazardous Building Materials Inventory.

#### d. Project Goal 7

The redevelopment of the now vacant CP property will be an important economic development project for the Town of Walpole by helping sustain and allow for the growth of economic activity. Lots 65 and 66 are landlocked within the commercial /residential center of Walpole known as Walpole Village. The property will become a needed extension of an adjacent public parking lot supporting the Village and is estimated to have capacity to create up to 40 new public parking spaces in the Village area as well as a small green space area, and E-vehicle charging stations. Three restaurants, one grocery store, three retail shops, one bank, one health clinic, one mini mart and a bakery are all within the surrounding three blocks as well as numerous apartments, single residences and business offices all of which support an aging population in this rural and isolated New Hampshire community. On-street parking and the one existing small parking lot cannot and does not meet the needs of the numerous employees, businesses and residents. 8

---

 Number: 1 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 9:48:35 PM  
releases of metals and PFAS

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 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:43:04 PM  
We will clarify.

---

 Number: 2 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:48:20 PM

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 Number: 3 Author: brd-aflammia Subject: Sticky Note Date: 1/28/2019 5:43:45 PM  
What about an exposure pathway section in intro section, below this one r after project goal? This highlighted area and the GW highlighted area below should go in that new section - tease this discussion out by exposure pathway.

---

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:48:24 PM  
The full ABCA/RAP does have an exposure pathway section and we look forward to additional input for the final ABCA. For this document we are making a concerted effort to be concise but thorough, and adhere to the EPA format for this grant application.

---

 Number: 4 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:44:03 PM

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 Number: 5 Author: brd-aflammia Subject: Sticky Note Date: 1/28/2019 5:49:02 PM  
So the dust issue in surficial soils should be called out better in the proposal as I feel like this could be presented in a way that evokes urgency. Like what is the likelihood of these highly contaminated areas being disturbed enough to produce a dust exposure? If its minimal, fine but if theres a potential for disturbance than embellishing a little on the exposure risk could play in our favor.

---

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:50:54 PM  
Agreed. Thank you. We will look at the proposal and make sure this concern is clearly called out within the space limitations - I believe it is, as is reference to air monitoring during remediation.

---

 Number: 6 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 9:46:29 PM

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 Number: 7 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 11:14:12 AM  
great job!

---

 Number: 8 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:01:22 PM  
on the e-charging point, contact Duncan Watson on Con Comm as he was approached in his role for Keene by an e-charging firm but the #s didn't work for Keene. Put this in the public comment record and add any pertinent info to this section.

---

 Author: SFR Subject: Sticky Note Date: 1/28/2019 5:52:28 PM  
Good suggestion! This document and your thoughtful and helpful input will be included in the public comment record.

## II. Applicable Regulations and Cleanup Standards

### a. Cleanup Oversight Responsibility

The cleanup will be overseen by the Town of Walpole's future-contracted Qualified Environmental Professional (QEP; i.e., a firm authorized by the State of New Hampshire to practice engineering, with a New Hampshire-licensed Professional Engineer in responsible charge), the NH DES (through the NH DES Brownfield Covenant Program for which the Town of Walpole has been determined to be an eligible person under RSA 147-F), and the U.S. EPA. In addition, all documents prepared for this Site are submitted to the NH DES and are publicly available through their online OneStop database under Site #199806071.

### b. Cleanup Standards for major contaminants

The Town currently anticipates that the current applicable (June 2015) Soil Remediation Standards codified in the Chapter Env-Or 600 will be the clean-up standards for regulated contaminants at the Site. Regulated contaminants could also be left in place at concentrations up to but not exceeding NH DES Risk Characterization and Management Policy Method 1 NH S-3 standards for the planned commercial use, if under an appropriate engineered cap and Activity and Use Restriction.

### c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

Laws and regulations pertaining to Wastewater Pre-Treatment Building materials removal and disposal, including building contents and the abatement, demolition, and disposal of building materials:

1. 40 CFR Parts 260–273 and New Hampshire Code of Administrative Rules Chapter Env-Wm 1000 for management of Universal Wastes;
2. 40 CFR Part 761–Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions for management of materials with PCB concentrations  $\geq 50$  mg/kg;
3. Section 608, Title VI of the Clean Air Act Amendments of 1990 (CAA) for management of refrigerants (if applicable);
4. *Lead in Construction*, 29 CFR 1926.62, for management of lead painted surfaces;
5. New Hampshire RSA 141-E and the New Hampshire Code of Administrative Rules Chapter Env-A 1800, *Asbestos Management and Control* for management of asbestos containing materials;
6. New Hampshire Code of Administrative Rules Chapter Env-Hw 100-1200 Hazardous Waste Rules; and
7. New Hampshire Code of Administrative Rules Chapter Env-Sw 100-2100 Solid Waste Rules.

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 Number: 1      Author: brd-aflammia      Subject: Sticky Note      Date: 1/17/2019 10:03:29 PM  
delete

 Author: SFR      Subject: Sticky Note      Date: 1/28/2019 5:53:53 PM  
I agree it's clunky, but the format does call for clarification on this point so out of an abundance of caution, we are leaving it in.

---

 Number: 2      Author: brd-aflammia      Subject: Highlight      Date: 1/17/2019 10:03:23 PM

The primary regulatory requirements related to soils remediation at this Site are contained in New Hampshire administrative rules:

1. New Hampshire Code of Administrative Rules Chapter Env-Or 600 Contaminated Site Management;
2. New Hampshire Code of Administrative Rules Chapter Env-Hw 100-1200 Hazardous Waste Rules;
3. New Hampshire Code of Administrative Rules Chapter Env-Sw 100-2100 Solid Waste Rules; and
4. Federal stormwater regulations under the National Pollutant Discharge Elimination System (NPDES) program.

Also, all work is to comply with applicable OSHA requirements,<sup>1</sup> including, but not limited to: General Industry, Construction Industry (29 CFR 1926), Personal Protective Equipment (29 CFR 1910.132), Hazard Communication (29 CFR 1910.1200), Occupational Noise Exposure (29 CFR 1910.95), Respiratory Protection (29 CFR 1910.134), and Hazardous Waste Operations and Emergency Response standards (29 CFR 1910.120).

All appropriate permits<sup>3</sup> (e.g., notify before you dig, soil transport/disposal manifests, industrial indirect discharge permits for treated groundwater as may be required by Walpole or the municipal wastewater treatment facility located across the Connecticut River in Vermont) will be obtained prior to the work commencing.

In addition, the work will be implemented in accordance with U.S. EPA's Clean and Greener Policy for Contaminated Sites, Revised February 2012 (Green Remediation Principals) to the extent practicable.

### III. Evaluation of Cleanup Alternatives

#### a. Cleanup Alternatives Considered

Three remedial alternatives were considered for the Site to remediate soils contaminated by plating processes, and to remediate groundwater at the Site, including<sup>5</sup> Alternative #1: "Monitored Natural Attenuation" (MNA), Alternative #2: "Excavate and Dispose of Soils with Soil Remediation Standard (SRS) Exceedances", and Alternative #3: "Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place".

<sup>7</sup> Alternative #1: A MNA (No Action) alternative signifies that no remediation activities would be conducted at the Site, other than: (1) the building on-site would be abated of hazardous materials and the sump's contents removed and properly disposed of, and the building demolished and properly disposed of; and (2) the removal (and proper waste characterization and disposal) of the upper 1.5 feet of soils over non-paved areas to eliminate soil exposure risk and to construct a parking lot (the "pavement section"). Periodic sampling of the groundwater would be required over a long time period as attenuation through mobilization and dilution slowly reduces the residual contaminant source(s) in contact with groundwater. Remaining soils would be managed in place under an Activity and Use Restriction.

- 
-  Number: 1 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 10:04:38 PM
- 
-  Number: 2 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:02:47 PM  
delete
-  Author: SFR Subject: Sticky Note Date: 1/28/2019 5:54:47 PM  
It is a lot of detail but speaks to planning.
- 
-  Number: 3 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 10:02:09 PM
- 
-  Number: 4 Author: brd-aflammia Subject: Sticky Note Date: 1/28/2019 5:54:52 PM  
delete
-  Author: SFR Subject: Sticky Note Date: 1/28/2019 5:56:29 PM  
Same comment as above.
- 
-  Number: 5 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 10:05:17 PM
- 
-  Number: 6 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:35:04 PM  
bulleted would be cleaner for presentation. Also, could these alternative titles be paired down? They are a lot to absorb when presented within text in subsequent sections
-  Author: SFR Subject: Sticky Note Date: 1/28/2019 5:57:48 PM  
Your bullet suggestion is good and will make the titles more digestible.
- 
-  Number: 7 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 10:10:40 PM
- 
-  Number: 8 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:17:22 PM  
I still think that this is a lot of remedial action. Its just not actively remediating GW via source removal. But you're removing the building which has sat there for years and could continue to do so, and 1.5 feet of soil to make way for the parking lot. I think the way to present this is that the no action alternative is continuing as we have been, with no parking lot redevelopment. Since the BF grants are all about redevelopment, one of the alternatives should include not doing this redevelopment.
-  Author: SFR Subject: Sticky Note Date: 1/28/2019 6:03:15 PM  
The fact is that the DES would not allow this Site to remain as is; the lowest cost effort to receive some interim acceptance by the DES is a simple cover to reduce exposure risk, followed by groundwater monitoring until such time that source removal could be implemented. Given the soil dust exposure risk, we interpret this approach (simple cap/MNA) to be the baseline.

Alternative #2: As part of the “Excavate and Dispose of Soils with SRS Exceedances” alternative the building on-site would be abated of hazardous materials and the sump’s contents removed and properly disposed of, and the building demolished and properly disposed of to access underlying soils. Regulated soils with contaminant concentrations greater than soil remediation standards would be removed from the Wastewater Pre-Treatment Building sumps area and the plating area, stockpiled into suspect hazardous soils and possible non-hazardous soils, tested for waste characterization parameters, and disposed of at a facility permitted to accept the waste based on hazardous waste characteristic. Site non-regulated soils would be reused as backfill in remedial excavations on the lot of origin and beneath the parking lot pavement section, but above the groundwater table. <sup>1</sup> Groundwater monitoring under a groundwater management permit would be required until applicable standards are met. <sup>2</sup>

<sup>3</sup> Alternative #3: The “Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place” alternative is similar to Alternative #2 with the exception that only those shallow soils needed to construct the parking lot and those deeper soils that are likely to act as an ongoing source to groundwater are to be excavated for disposal. As part of this alternative the building on-site would be abated of hazardous materials and the sump’s contents removed and properly disposed of, and the building demolished and properly disposed of to access underlying soils. Regulated soils with impacts greater than a leaching-based Site-specific standard would be removed from the plating line area and all soils from beneath the Wastewater Pre-Treatment Building sumps would be removed; stockpiled into suspect hazardous soils, and possible non-hazardous soils; tested for waste characterization parameters; and disposed of at a facility permitted to accept the waste, based on hazardous waste characteristic. Site non-regulated soils would be reused as backfill in remedial excavations on the lot of origin and beneath the pavement section, but above the groundwater table. Groundwater monitoring under a groundwater management permit would be required until applicable standards are met.

#### **b. Cost Estimate of Cleanup Alternatives** <sup>4</sup> <sup>5</sup>

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

##### Effectiveness

Alternative #1: The MNA (No Action) alternative is not fully protective of human health and the environment and does not meet threshold criteria because it does not address ongoing sources to groundwater impacts. The MNA alternative achieves some reduction of the toxicity, mobility, and volume of the hazardous substances present at the Site by removal of the building and associated wastes and near-surface soils to construct the asphalt-paved parking lot.

Alternative #2: The Excavate and Dispose of Soils with SRS Exceedances remediation alternative can achieve significant reduction of the residual volume of impacted soil at the Site, in-turn decreasing the duration of groundwater impacts due to the presence of metals in the sump and plating areas and PFAS in the plating area. Removal of Site impacted soil and on-Site relocation and controlled placement and management of unregulated soils under the parking lot and above the groundwater table would further reduce or eliminate the risk of exposure to trespassers and potential workers associated with Site redevelopment or ongoing maintenance. Note that the NH DES has concurred

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 Number: 1 Author: brd-aflammia Subject: Highlight Date: 1/17/2019 10:19:34 PM

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 Number: 2 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:19:34 PM  
put this sentence in no action alternative as well if it still applies there

 Author: SFR Subject: Sticky Note Date: 1/28/2019 6:03:48 PM  
Yes. Thank you.

 Number: 3 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:24:10 PM

If an asphalt cap is emplaced over the site, what type of leaching could occur? Are PFAS mobile enough in soil to continue a downward migration and impact GW without the downward pressure of rainwater infiltration? I'm not up enough on PFAS migration in vadose zone soil to answer this question

 Author: SFR Subject: Sticky Note Date: 1/28/2019 6:09:30 PM

This alternative relies on reduced source removal and being able to predict what contaminant levels (chromium) can remain but not be an ongoing source to groundwater. The concern is the depth interval of soils subject to season groundwater fluctuations, and we were unable to establish a site-specific leaching based standard - and the DES was not supportive of this approach, either. NH has not established leaching based standards for PFAS, but they are mobile and likely also present in the "smear zone".

 Number: 4 Author: brd-aflammia Subject: Sticky Note Date: 1/17/2019 10:32:41 PM

Under sustainability section, add in a line about exploring permeable parking lot construction materials in order to manage stormwater flows from the proposed parking lot? If all soils above SRS are removed, why not (other than PFAS in GW and I'm not sure of the ramifications)? We have a Tractor Supply in town who used these in their new parking lot.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 6:31:16 PM

We are reluctant to infiltrate storm water in a Groundwater Management Zone, and the DES does not typically support storm water infiltration in the GMZ except as part of remediation (for example to promote biodegradation - N/A for this site) .

 Number: 5 Author: brd-aflammia Subject: Sticky Note Date: 1/28/2019 6:09:40 PM

I would separate effectiveness, implementability and cost and present cost last. I would also add sustainability, operation and maintenance and institution controls in as metrics to evaluate each alternative.

 Author: SFR Subject: Sticky Note Date: 1/28/2019 6:10:03 PM

 Author: SFR Subject: Sticky Note Date: 1/28/2019 6:11:26 PM

We will be adhering to the EPA's concise format for this submittal, the final RAP ABCA will provide additional breakdown (similar to the published ABCA/RAP).

that, at this time, groundwater monitoring only would be required for the former Teflon tank PFAS-impacted area as there are no New Hampshire soil remediation standards for PFAS.

Alternative #3: The Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place remediation alternative can achieve significant reduction of the residual volume of impacted soil at the Site, in-turn decreasing the time period (as measured in years) that groundwater contaminant concentrations are above Ambient Groundwater Quality Standards (AGQS). Removal or on-Site relocation and management under an Activity and Use Restriction (AUR) (and beneath the paved parking lot) of Site impacted soil with concentrations above SRSs would reduce or eliminate the risk of exposure to trespassers and potential workers associated with Site redevelopment or ongoing maintenance. Following removal of the source of groundwater impacts, significant reductions in overburden groundwater metals and PFAS concentrations should be an outcome in near term for the Site. However, it is anticipated that groundwater impacts will remain for a number of years since this alternative would leave in place marginally impacted soils at concentrations less than a Site-specific leaching-based standard to be determined, and the reliability of the Site-specific standard is not assured.

Due to the upland setting and lack of potentially-threatening surface water features in the area, climate change effects from rising sea level and/or changing flood zones are not anticipated to represent a major threat. As such, the primary climate change concerns would be associated with extreme weather, increased rainfall, and rising groundwater tables. For this Site and the planned work (any of the three alternatives), effects of extreme weather can be mitigated by industry standard engineering controls during construction. A rising water table due to increased precipitation would be most likely to adversely impact Alternative #1 and favor Alternatives #2 and #3, because the later alternatives would focus on removing source mass at depths that extend slightly into the groundwater table, whereas Alternative #1 does not.

### Implementability

Alternative #1: The MNA (No Action) alternative is the simplest to implement because no remediation-specific actions will be conducted other than those required to demolish the building and construct the parking lot and to conduct ongoing monitoring of groundwater quality.

Alternative #2: The Excavate and Dispose of Soils with SRS Exceedances remediation alternative includes the actions needed to demolish the building, identical to Alternative #1. The excavation of impacted soils to up to about 17 feet below grade and testing and off-site disposal of soils is technically feasible, as is ongoing monitoring of groundwater quality for a reduced time period.

Alternative #3: The Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place remediation alternative includes the actions needed to demolish the building, identical to Alternative #1, and the excavation/disposal of impacted soils at the Site is technically feasible; however, the Site investigations were unable to identify a leaching-based standard at a concentration greater than the SRS that would provide confidence in reducing future impacts to groundwater. Therefore, the intended benefit of targeted soils removal, namely, to reduce the groundwater monitoring time period, may

not be reliably achieved if impacted soils at concentrations above SRSs are left in place. Therefore, although the reduced soils disposal volume (and cost) is financially desirable, this alternative does not appear to be practical from a technical implementation perspective.

### Cost

It is estimated that costs under Alternative #1 MNA (No Action) related to building removal, and surface soils removal to accommodate the paved parking area and provide a cap, is \$225,000. This cost does not include ongoing groundwater monitoring.

Alternative #2, Excavate and Dispose of Soils with SRS Exceedances, costs are estimated to be \$730,000. This cost does not include ongoing groundwater quality monitoring.

Alternative #3, Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place, is estimated to cost roughly \$450,000 (assumes a 50% reduction in soils removal and disposal), assuming all targeted remediation soils are hazardous. This cost does not include ongoing groundwater quality monitoring.

### **c. Recommended Cleanup Alternative**

The recommended cleanup alternative is Alternative #2: “Excavate and Dispose of Soils with SRS Exceedances” as this alternative protects human health and the environment and is effective, technically feasible, and practical. Because this alternative best meets the evaluation criteria and is not cost-prohibitive, this alternative has been selected for implementation at the Site.

Alternative #1, MNA (No Action), cannot be recommended since it does not specifically address source area mass with contaminant concentrations above regulatory standards; i.e., it does not reduce the ongoing contaminant sources to groundwater in compliance with Env-Or 600.

Alternative #3, Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place, is less expensive; however, establishing an effective leaching-based standard at which soils can be left in place without ongoing groundwater impact has sufficient uncertainty and casts considerable doubt of achieving the goal of adequate source reduction. This negates some or all of the cost benefit (i.e. this approach could require long-term monitoring of groundwater) and, therefore, may not achieve Env-Or 600 required clean-up goals.

Remedial Alternatives #1 and #3 have significant shortcomings and/or uncertainty toward meeting Site clean-up goals. Remedial Alternative #2 best meets all goals including attainment of source area (impacted soils) clean-up standards, and is not cost prohibitive and, therefore, is the recommended alternative.

**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Attachment 2**

Meeting Notes or Summary from the Public Meeting

**TOWN OF WALPOLE  
NEW HAMPSHIRE  
OFFICE OF THE SELECTBOARD  
SPECIAL PUBLIC HEARING  
REGARDING PROPOSED BROWNFIELDS CLEANUP GRANT  
For the Former Central Plating Site  
Located at 12 Westminster St., Walpole, NH  
January 17, 2019**

Selectboard Present: Peggy Pschirrer (Chair); Steven Dalessio; Cheryl Mayberry

Public Present: Frederick Ernst, Karen Crowley, Tom Goins, Ellen Adams, David Adams, Raynie Laware, Alicia Flammia and Steven Rickerich

**CALL TO ORDER:** Mrs. Pschirrer called this Special Public Hearing to order at 6:00 PM in the Walpole Town Hall to review the Proposed Brownfields Cleanup Grant. She advised the public that this Public Hearing was being recorded and asked anyone wishing to speak to identify themselves for the record by stating their name, where they lived in town, and what their interest was in the project. She advised the public that the EPA required this Public Hearing along with a sign-in sheet and minutes, both of which would be attached to the Grant application. Mrs. Pschirrer thanked the public for attending.

The following documents were available: 1) Draft Application for U.S. EPA Brownfield Cleanup Grant; 2) Draft Analysis of Brownfields Cleanup Alternatives - Preliminary Evaluation Central Plating Site, 12 Westminster Street, Walpole, New Hampshire, NH DES Site #199806071.

Mrs. Pschirrer began this Public Hearing with a brief history of the project that started two years ago with a Public Hearing for RSA 41:14(a) which gives towns in NH the permission to buy, acquire or sell property. At that time, the Town had entered into negotiations with the Southwest Regional Planning Commission and Peter Adams, executor of the Westberg Estate. The Westberg property is the landlocked parcels designated as Map # 020-065 and 066 which are highly-contaminated. The Westberg family had wanted to give the property to the town. Instead, the Town bought the properties for \$1.00 on January 3, 2019 having signed the Purchase & Sale Agreement on January 1, 2019. The Town proceeded promptly because the Phase I Environmental Site Assessment conducted by Ransom Consulting, Inc., located in Portsmouth, NH, is time-limited. The report was completed in October 2018. If the town had not bought the property by January 3, 2019 and had waited until later in the month, portions of the report might have to be re-done. Rather than do that, the Town decided to buy the land on January 1st. The Town had been negotiating a Purchase & Sale Agreement with the Westberg family which included a \$175,000 donation from the Westbergs that had been put into escrow and would be applied toward the cleanup and future environmental obligations associated with the property. Mrs. Pschirrer encouraged the public to read the above-referenced documents because comments by the public may be received by the Selectboard up to January 24, 2019 and included with the grant application.

After that, comments could not be included with the application because the grant is due January 31, 2019. [Note that comments received after January 24th will also be responded to.]

After providing a brief history of the project, Mrs. Pschirrer asked for comments.

Mr. Steven Rickerich from Ransom Consulting, Inc. introduced some additional background into the record stating that the Town was applying for a US EPA Brownfields Cleanup Grant. Because the potential value of the property and its re-sale is compromised due to the presence of contaminants; because the town is an eligible entity as a municipality; and because the people who live nearby are potentially affected by the property, the site is a good and deserving candidate for EPA Brownfields funding. That funding would cover most of the remediation costs. At the completion of the remediation, the site would then be better-positioned for re-development. Part of the grant requirements is that the

Town sign an agreement with the US EPA stating that the Town agrees to adhere strictly to the rules and requirements of the grant. Some of the rules require that a certain percentage of the grant be spent on, or that diligent efforts be made on, procuring women-owned business enterprises or minority-owned businesses services, which the Federal government encourages. Mr. Rickerich went on to explain that the Analysis of Brownfields Cleanup Alternatives (ABCA) which Ransom Consulting prepared is required by both the EPA and the NH DES and evaluates potential remedial options that could be used to bring the property back into compliance with State and Federal laws. He noted that the draft ABCA is available for the public's review as well as the more detailed final report called the Remedial Action Plan which had been completed through the SWRPC Brownfields Assessment Grant program. Mr. Rickerich further advised that should the Town procure funding, a finalization process would be initiated in which a similar meeting would be held.

Mr. Fred Ernst asked Mr. Rickerich about the timetable for the project. Mr. Rickerich explained that the timetable is a 3-year grant period: the application is submitted on January 31, 2019; the awards are announced in late May/June 2019; and the money is then typically available in October. If the town is awarded the moneys, it would then need to initiate public outreach efforts that would inform the public of next steps to be taken, one of which would be to selection of a Qualified Environmental Professional (QEP) through a fair, open, and competitive process. The town is also planning to select a group of citizens who would constitute a Cleanup Task Force which would help guide the Town throughout the cleanup process. That Task Force could include members of the Town, such as those in attendance at this Public Hearing, as well as a representative from the SWRPC, the DES, and the EPA. Once a QEP is hired, the remedial action/ABCA plan would be finalized and a site specification plan would be developed which would guide the cleanup contractor in accordance with the specifications outlined in the ABCA. The process for selecting the future contractor would require the Town to initiate Requests For Proposals (RFP's) and obtain statements of qualifications from potential cleanup contractors. All this would put the timetable at some time the summer 2020. Once the contractor is selected, the cleanup process should proceed fairly quickly. Based on prior experience, Mr. Rickerich estimated the total project should take approximately 24 months from the date of application to completion, leaving an additional twelve months as a contingency in the event of unforeseen circumstances. The process and timeframe allows for the EPA and DES to review and comment on various materials, such as the site specifications, and each review cycle can take 30 days. Additional time also allows the public opportunity to give as much constructive input into the process as possible.

Mrs. Pschirrer provided a summary of the Draft ABCA noting that Ms. Alicia Flammia of the Walpole Conservation Commission had reviewed it as well. The draft ABCA proposes that the building currently on-site be removed; in addition, the soils would be removed to a depth of up to 17 feet below grade from the site where the Plating business was located. All this would be done in accordance with OSHA requirements. Because the area is land-locked and located in the middle of the town's businesses and residences, police would be on-hand to direct traffic and pedestrians. Once the contaminated soil was removed, clean soil would then be brought in. During the soil removal, the soil would continue to be tested because of its high contamination levels.

Mr. Rickerich explained that chromium was the primary contaminant left by the Plating works, and that hexavalent chrome is a recognized carcinogen. In addition, per- and polyfluoroalkyl substances (PFAS) are present at the property in site groundwater and soils. PFAS were used by the Plating company to reduce workers' exposure to chromium fumes that emanated from the chrome plating bath. Fume suppression was required by the EPA to human reduce exposure risk and airborne emissions.

Mrs. Pschirrer explained that the Town was applying for the maximum allowable amount available through the EPA Grant which is \$500,000. The Town has also applied to the DES which has communicated that, should the town be approved for the \$500,000 EPA grant, it would award the town \$100,000. The total cost for the cleanup project will be \$730,000. A portion of the cost will be covered by some of the Westberg Estate's donation that is being held in escrow by the Town's attorney. In addition, the Town is writing a petition to the EPA asking the agency to waive a \$100,000 required

match. Ms. Alicia Flammia asked if the DES money could be used to meet that required match. Mrs. Pschirrer said it could not. Mr. Rickerich explained that the EPA looks favorably upon applications that secure other funds like the \$100,000 DES grant, and the \$175,000 in escrow as leveraged funds for the remediation and redevelopment project. He also said that services provided by the Town such as the Police and Town Administrator could be used to meet the matching fund requirement. However, Mrs. Pschirrer believes the EPA should waive that requirement because Walpole is 1) the oldest town (age of residents) in Cheshire County with many residents living on fixed retirement incomes and 2) is facing two potentially expensive infrastructure challenges (i.e. the Dam that was part of the recent Hazard Remediation Plan and is currently under re-construction and the aging sewer system that runs under the Vilas Bridge and will need to be re-piped and re-routed).

Mr. Dalessio asked if the EPA would assign a Project Officer who could object to efforts proposed for the re-development phase. Ms. Alicia Flammia answered that the grant's primary focus is remediating the contaminants. Mr. Rickerich agreed adding that, while the re-development phase is an important part of the grant application, removing the contaminants and reducing exposure risk is the EPA's primary concern, which makes the redevelopment, afterwards, possible.

Mr. David Adams, an abutter to the project site, stated he and his wife had written many letters to the EPA in the past re: chemical fumes emanating from the Plating company. As a result of those experiences with chemical fumes, he wondered if there would be any airborne hazards emanating from the project site once the soils are disturbed? Mr. Rickerich answered that, as part of the remediation, the contractor will be required to conduct real-time air sampling and perimeter monitoring as well as adhere to all OSHA requirements for his employees. The contaminants that are currently on-site are not volatile. Mr. Adams concern has to do with airborne dust. During excavation, the contractor will be required to place dust-control measures in place to reduce exposure to the metals that cling to dust particles and become airborne. Mr. Rickerich explained that there are acute exposures and chronic exposures and that the exposure standards used during the work consider a workers' exposure over the course of 8 hours/day for 50 weeks/year over many years. The standards set at the perimeters of the project, as opposed to the center of the project, are even more stringent than the standards used for workers exposed over considerable periods of time; and by contrast, the abutters' potential exposure may occur for a 2-week period. Ms. Flammia added that the contractor would need to ensure that the chemicals or metals within the dust stay on-site by using dust-suppression measures. Mr. Rickerich stated they had advanced borings on the site and that the soil is not particularly fine-grained; it is a silty-sand but not the kind that disperses in a quick blast of air. If the soil were to sit in dry air for a prolonged period, the contractor might need to mist it or apply a chloride salt to keep dust on-site. In addition, as part of any Health & Safety Plan required of a cleanup contractor, exclusion zones would be established where there are the most stringent requirements as to who would be allowed to enter and what safety measures were required; beyond this zone would be a contaminant-reduction zone where workers might be exposed to lower concentrations of contaminants and with less stringent safety requirements. Mr. Fred Ernst asked how far these zones would extend beyond the site's boundaries? Mr. Rickerich responded saying both zones would be right on the remediation site so that potential exposure risk at the property boundary was mitigated to acceptable levels and there would be little to no exposure. The contractor will need to control not only dust, but also stormwater runoff from the site as well.

Mr. Fred Ernst asked who would be responsible for monitoring these risk exposures. Mr. Rickerich said the engineer/Qualified Environmental Professional will be overseeing the contractor's work to ensure that all safety measures are followed.

Mr. Adams asked that, as a property abutter, was there anything they needed to do to prepare for the project? Mr. Rickerich said he did not think so. Mrs. Pschirrer, however, asked Mr. and Mrs. Adams to sit on the Cleanup Task Force so that they could be kept apprised of all ongoing efforts at the project site. Mr. Rickerich encouraged all citizens to become engaged with the project and to be vocal with any and all concerns especially if anything looked amiss. Mrs. Pschirrer added that, in addition to Mr. and Mrs.

Adams, other neighbors of the site would be asked to serve on the Task Force as well as Ms. Raynie Laware as a representative of the Walpole Foundation.

Ms. Raynie Laware and Ms. Karen Crowley, both of whom work for the Walpole Foundation, distributed a statement they had prepared in support of the project. In the statement, they maintained that the Walpole Foundation had nine properties in the Village, three of which border the project site. Eleven residential units were located in those properties with twelve people living in them. The Foundation wants the site cleaned up for the health and safety of those tenants. Ms. Raynie Laware also submitted for the record a copy of a 2001 Eagle Times article that described the contamination from Central Plating that was clogging up the wastewater treatment plant in Bellows Falls. She stated that the article lent further validation of the Foundation's concern for its tenants' health. In addition to the health risks posed by the property, Ms. Laware stated that the Foundation endorsed the proposal outlined in the re-development phase to build more parking for the Town on the remediated site.

Mr. Tom Goins, managing partner of Burdick's Restaurant, the Walpole Grocery Store, and the building these businesses are located in, expressed his support for the project, particularly the proposal made in the re-development phase to build a new parking lot at the remediated site. Mr. Goins explained that he has 35-45 employees who work at the restaurant and grocery store. Finding safe parking for many of them has been a challenge. In addition, the building has four residential tenants which he provides parking for plus commercial tenants on the second floor who need parking. Currently, Mr. Goins parks in the lot beside the Mascoma Bank which the town leases, but an additional forty parking spaces located at the project site would be a great value to him and the safety of his employees. Furthermore, reducing the parking pressures currently exerted on Westminster and Main Streets would vastly improve the safety of residents, employees, and visitors.

Mr. Fred Ernst, neighbor to the project site and President of the Library, also voiced support for the redevelopment phase of the project stating that the parking spaces that would be built on the remediated site would be a benefit to the Library since it currently has no parking for its patrons or employees. In addition, Mr. Ernst said that, as a neighbor of the project site, he is particularly interested in monitoring how well the contractors, workers, and consultants manage the project.

Mr. David Adams asked, as a Fire Commissioner, if there would be any involvement of the Fire Department in the cleanup. Mrs. Pschirrer replied that the Fire Department's involvement had not been discussed as yet. Mr. Rickerich added that none of the contaminants were flammable; however, the Fire Department's experience coordinating response efforts in the case of emergencies could, in the unlikely event of an emergency, be helpful. Mrs. Pschirrer asserted that if the town is awarded the grant, a system of communications between various town departments, project workers and town residents would be established.

Mr. Fred Ernst then asked if the Town would re-apply for the grant next year if it were not awarded this year. Mrs. Pschirrer affirmed that the town would apply for the grant again next year. The EPA, however, has already invested money in the site through the existing Brownfields program. Mrs. Pschirrer said that an additional \$150,000 had already been spent from other sources: \$70,000 had been provided by the Walpole Foundation, which covered the funding for the first round of soil tests, and \$78,000 was from the Southwest Regional Planning Commission. In addition, the DES paid for the last round of testing that had measured PFAS' levels on the site.

Ms. Alicia Flammia asked if the costs associated with groundwater monitoring had been included in the total cleanup costs of the ABCA application. Mr. Rickerich replied that, since the ABCA was written from the perspective of cleanup costs. The \$730,000 did not include long-term monitoring costs. However, a 15% margin had been added to the soil volume calculation and a buffer had been added to the total dollars to cover "worst reasonable cases" which, arguably, could cover some of the future groundwater monitoring costs if more favorable outcomes were realized – although neither the DES nor EPA grant monies (nor the required match) could be used for long-term groundwater quality monitoring.

Mr. Dalessio added that a provision in the Purchase & Sales Agreement had earmarked any remaining moneys from the Westberg donation as funds for long-term monitoring. Ms. Flammia asked Mr. Dalessio if he thought there would be any funds remaining and, if not, how the town would fund long-term monitoring, for what period of time, and whether monitoring and analysis would be viable for PFAS. Mr. Rickerich answered that there was currently no PFAS remediation slated for the area where the teflon tank had been located, other than surface soils, because the State currently had no standard for PFAS in soils. The "worst reasonable case" scenario did include an allotment of another 100 tons of soil for PFAS disposal and an additional \$50,000 for delineating the soil impact area before it was removed. In addition to those sums, Mrs. Pschirrer noted that, in the waiver of matching funds petition, she had designated any funds remaining from the Westberg escrow for long-term monitoring. Mr. Rickerich added that, in answer to Ms. Alicia Flammia's question about length of time needed to conduct long-term monitoring, the way to determine this was to first implement the remedial measures and then gather data on how quickly the groundwater contamination attenuated because, once the source of contamination was removed, the contaminant attenuation rates should increase, and the time to reach groundwater standards should decrease. After this data had been collected for a period of years, a trend would emerge which would permit the town to project the length of time needed to monitor contaminants.

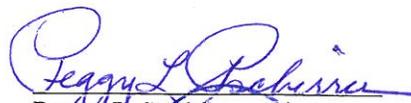
Mr. Adams asked if the Federal government's shutdown would put a delay on the project. Mrs. Pschirrer said that was unknown. Ms. Flammia said her company was assuming that all grant deadlines were on track and that the submittal dates remained in effect. However, the EPA shut-down has caused all active work projects to come to a halt and EPA reviews of all other documents, like site specification plans, had been suspended.

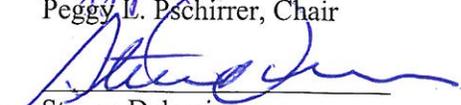
Mrs. Ellen Adams asked if the groundwater flow from the site would carry contaminants onto their property. Mr. Rickerich stated that, because the groundwater flow on the site was toward the Connecticut River, it was unlikely that contaminants would enter their property from groundwater flow. Furthermore, a number of monitoring wells had been placed by Jake's gas station and a number of other wells had been placed off-site. He then explained how groundwater flow was calculated and that, based on those calculations, and the distribution of dissolved contaminants Ransom Consulting had inferred the likely extent of downgradient impacts.

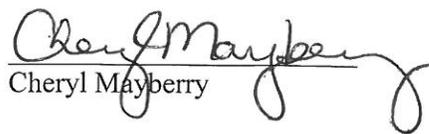
Mrs. Pschirrer stated that if there were no further questions, the meeting would be adjourned. She encouraged all members of the public to submit any written comments about the cleanup project to the Selectboard by January 24, 2019. The Selectboard would answer all written questions and concerns. Ms. Alicia Flammia said she had reviewed the ABCA application and that she would send her comments to Mrs. Pschirrer and to Mr. Rickerich. Mrs. Pschirrer thanked all the people for their time and interest. Seven members of the public and two town employees were in attendance.

**ADJOURNMENT:** Mrs. Pschirrer adjourned this Special Public Hearing at 6:52 PM.

Respectfully submitted,  
Beth Colley, Recording Secretary Pro Tempore

  
Peggy L. Pschirrer, Chair

  
Steven Dalessio

  
Cheryl Mayberry

(Note: These are unapproved Minutes. Corrections will be found in the Minutes of the January 24, 2019, Selectboard Meeting.)

RAYNIE LAWARE

KAREN CROWLEY

WE ARE EMPLOYEES OF THE WALPOLE FOUNDATION AND ARE HERE IN SUPPORT OF THE BROWNSFIELD PROJECT. WE HAVE 9 PROPERTIES IN THE VILLAGE WITH THREE OF THOSE PROPERTIES BORDERING THE WESTBURG (CENTRAL PLATING) PROPERTY. IN THOSE 9 PROPERTIES ARE 21 RESIDENTIAL UNITS AND 10 COMMERCIAL UNITS. OF THE RESIDENTIAL UNITS 11 BORDER THIS PROPERTY WITH 12 PEOPLE LIVING IN THOSE UNITS. SOME OF OUR TENANTS ARE ELDERLY IN FACT ONE OF OUR TENANTS IS THE OLDEST RESIDENT OF WALPOLE AND WILL BE 102 IN MARCH. WE WANT TO SEE THIS AREA CLEANED UP FOR THE HEALTH AND SAFETY OF OUR TENANTS. THERE WAS AN ARTICLE MANY YEARS AGO IN THE EAGLE TIMES WHICH VALIDATES OUR CONCERN FOR OUR TENANTS. ASIDE FROM THE HEALTH RISKS OF THE PROPERTY THE TOWN IS IN DESPERATE NEED OF ADDITIONAL PARKING.

THANK YOU.

# EAGLE TIMES

SERVING THE TWIN STATE VALLEY

50¢  
VOL. 90, NO. 209

## Sludge transfers cause trouble

Walpole business likely source of nickel content above allowable levels

By DAMIEN FISHER  
Staff Writer

Interstate sludge transfers are causing headaches for the village as extremely high levels of nickel, likely coming from a Walpole business, have found their way into the wastewater treatment facility.

### Bellows Falls

According to Municipal Manager Shane O'Keefe,

testing done in June and July on the Bellows Falls wastewater treatment facility found 335 and 440 milligrams of nickel per one kilogram of sludge. The acceptable level is 98 milligrams per kilogram.

The village has been informed that it can no longer dispose of its sludge at the Claremont wastewater facility as long as the high nickel is present.

"We are going to be experiencing some extra costs," he said "We'll do what we can and we're shopping around for a sludge disposal company."

The high concentration of the mineral seems to be coming from Central Plating of New Hampshire, O'Keefe said that representatives from the

Environmental Protection Agency informed him the Walpole chrome and nickel plating shop has been in violation of the maximum levels of nickel allowed in wastewater since at least early this year.

This is not the first time Central Plating has been in trouble over environmental regulations. In 2001 the company was fined \$13,000 by the EPA for violations of the testing, monitoring, work practice and record keeping requirements of the Clean Air Act's standards for chromium emissions.

The company was also ordered to pay some \$94,000 to upgrade its pollution prevention system.

Both chromium and nickel have been

found to cause certain types of cancer in high exposures.

Walpole and Bellows Falls have a long standing agreement on their sewer system. Walpole has been sending its sludge to the Bellows Falls plant for decades. Now O'Keefe is looking for Walpole to do something about the contamination.

He is asking the Walpole selectmen to stop Central Plating from using the wastewater system. He also plans to ask the town for financial help with the clean up and disposal of the sludge.

"First, I'm trying to stop the problem and second I'm trying to find ways to recoup the losses," O'Keefe said.

See **SLUDGE** - Page A4

### SLUDGE FROM PAGE A1

Besides having to ship the sludge to another facility, O'Keefe said the village may have to clean out the digesters at its own treatment facility, adding to the costs.

The agreement between the towns allows Walpole to revoke the discharge authorization of any industry that discharges harmful waste into the system. O'Keefe said he was sure

Walpole would cooperate on the sludge issue.

"They're our partners here and we need to work this out," he said. "Given the history of the relationship between these two communities, I expect this to be settled amiably."

*Damien Fisher can be reached at (800) 545-0374 ext. 139, or by e-mail at [dfisher@eagletimes.com](mailto:dfisher@eagletimes.com).*

**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Attachment 2**  
Meeting Sign-in Sheet



**Attachment** to Cleanup Grant Application Narrative Proposal – Threshold Criteria  
Central Plating Site  
Town of Walpole, New Hampshire

**Threshold Criteria - Attachment 3  
Hardship Waiver Request**

Threshold Criteria - Attachment 3 – Hardship Waiver Request  
**Central Plating Site; Town of Walpole, New Hampshire**

Basis for Request: Please note that with no sales or income tax, NH's communities are more reliant on property taxes than most other states to meet a variety of needs, because other forms of revenue collection are prohibited by law. What's more, the cost of services and infrastructure are increasingly being downshifted from the State to local municipalities, putting even greater pressure on local property taxes. For example, in 2010, the state eliminated the \$25 million shared revenue program, which used to divide money among NH cities and towns. As such, the Cleanup of Central Plating, which has the immediate cost of \$730,000 (and estimated continuing environmental obligation costs of \$100,000 over 15 years) will be fiscally challenging for Walpole in any circumstance, but a waiver would provide significant relief. If awarded the grant we will move forward with or without the match waiver, however.

In a state that already has the third highest median age in the nation (42.7), Walpole Center has a median age of 59.6.<sup>1</sup> Walpole Center is the epitome of what NH Center for Public Policy has called “the silver tsunami”, the increasing trend of young people leaving the State for more economic opportunities, while the baby boomer population ages. One of the manifestations of this trend is that NH is expected to see its workforce numbers dip to its lowest level in 25 years.<sup>2</sup> Coupled with the rapidly depleting labor force, the area economy is one of the poorest performing including being the only NH county (Cheshire County) to lose net jobs in the State since the recovery from the national recession.<sup>3</sup>

In addition to losing workers and jobs, the disproportionate number of non-working, retired resident taxpayers are extremely low income. The most recent Census data shows that Walpole Center's household mean retirement income is \$13,229 compared to \$25,053 (NH) and \$25,798 (US). The proportion of households with income and benefits less than \$25,000 is 20.7% of households in Walpole Center compared to 7.6% (NH) and 11.7% (US).<sup>4</sup>

Additional property tax burdens on our taxpayers are tough to swallow because we have other urgent needs. For example, Walpole Center's sewer system is expected to need over \$1 million in investment towards a pump station upgrade and the construction of a rerouted sewer main line; the current sewer main is vulnerable because it runs over the Connecticut River under a deteriorating State concrete bridge closed by the State in 2008. The State has no plans to reopen the bridge as it does not have funding to do so. In addition, the Reservoir Dam, which has been on a State dam “watch list” for over 10 years, is the Town's Number 1 potential hazard in our Hazardous Mitigation Plan. The town hired an engineering firm to estimate the cost of repairing or replacing the dam, which if it failed would cause the floodway to destroy large parts of Walpole Center. A waiver of the required match would provide funds for engineering costs of at least one of these urgent needs.

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<sup>1</sup> 2013-2017 American Community Survey 5 Year Estimates, Table S0101

<sup>2</sup> <https://www.wmur.com/article/new-hampshire-workforce-expected-to-dip-to-lowest-level-in-25-years-by-2025/14430167>

<sup>3</sup> <https://www.dailyonder.com/job-growth-falters-in-rural-counties/2018/10/23/28169/>

<sup>4</sup> 2013-2017 American Community Survey 5 Year Estimates, Table DP03

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="01/31/2019"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Town of Walpole DBA Selectmen Office"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="020358779"/>	* c. Organizational DUNS: <input type="text" value="0234986400000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="34 Elm Street"/>	Street2: <input type="text" value="PO Box 729"/>	
* City: <input type="text" value="Walpole"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="NH: New Hampshire"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="036080729"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Peggy"/>	Middle Name: <input type="text"/>
* Last Name: <input type="text" value="Pschirrer"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Selectboard Chair"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="6037563672"/>	Fax Number: <input type="text" value="6037569209"/>	
* Email: <input type="text" value="ppschirrer@walpolenh.us"/>		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Environmental Protection Agency

**11. Catalog of Federal Domestic Assistance Number:**

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

**\* 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-18-07

\* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Brownfields Single-Site Clean-up of Walpole, NH Map 20 Lots 65 & 66

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="100,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed: