

**COMMUNITY RELATIONS PLAN
CENTRAL PLATING SITE
12 WESTMINSTER STREET
WALPOLE, NH 03608**

Prepared for:

Town of Walpole
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1.0 OVERVIEW OF THE COMMUNITY RELATIONS PLAN

Town of Walpole (the Town) has been awarded a \$500,000 Brownfields Cleanup Grant from the United States Environmental Protection Agency (U.S. EPA) and a \$100,000 grant from the New Hampshire Department of Environmental Services to contribute towards soil disposal costs for the Central Plating (CP) Site located at 12 Westminster Street in Walpole, New Hampshire (the Site).

The purpose of this Community Relations Plan is to describe the Town's strategy to address the needs and concerns of the community and residents who will potentially be affected by the proposed remediation at the Site. This Community Relations Plan outlines how the Town has involved, and will continue to involve, affected residents, Town officials, and local organizations in the decision-making process regarding the cleanup at and redevelopment of the Site.

Community organizations (COs) and active residents involved in neighborhood issues are important resources for the success of the Community Relations Plan because they have an understanding of the Site area and they hold positions of responsibility within the community. The Town regards these stakeholder citizens as key points of contact and communication. The long-term success of the redevelopment of the Site will be enhanced by informed citizen involvement at each step of the cleanup and redevelopment process.

2.0 SPOKESPERSON AND INFORMATION REPOSITORY

The Spokesperson for this project is Peggy Pschirrer, as a representative of the Town, who may be contacted at:

Peggy Pschirrer
Town of Walpole
34 Elm Street
Walpole, New Hampshire 03608
Phone: 603-756-3672
Email: ppschirrer@walpolenh.us

The information repository for this project, including the environmental assessments, remediation plans, and other environmental information is located at the following locations:

Town of Walpole – Selectboard Office (Sarah Downing)
34 Elm Street
Walpole, New Hampshire 03608
Phone: 603-756-3672
Office Hours: 8:00 AM to 5:00 PM, Monday, Tuesday, Thursday
8:00 AM to 1:00 PM, Wednesday, Friday

Online: <https://www.walpolenh.us/town-news>

and

Ransom Consulting, LLC (Steve Rickerich)
112 Corporate Drive
Portsmouth, New Hampshire 03801
Phone: 603-436-1490
Office Hours: 8:00 AM to 5:00 PM, Monday through Friday

Under New Hampshire’s Right to Know law, information submitted to the New Hampshire Department of Environmental Services (NH DES) and U.S. EPA is available for viewing during business hours under New Hampshire’s Right to Know law. The same information is available at the NH DES OneStop at: <https://www4.des.state.nh.us/DESOnestop/SiteDocuments.aspx?SiteNumber=199806071> and at NH DES and U.S. EPA offices:

NH DES
Hazardous Waste Remediation Bureau
29 Hazen Drive, PO Box 95
Concord, New Hampshire 03302-0095

Joe Ferrari, Brownfields Project Officer
U.S. EPA - Region I
5 Post Office Sq. Suite 100, 07-2
Mail Code 07-2
Boston, Massachusetts 02109-3912
Phone: 617-918-1105
Email: ferrari.joe@epa.gov

Most public meetings will be held in the Selectboard Office, at the following address:

Town Hall
34 Elm Street
Walpole, New Hampshire
603-756-3672

In addition, some public meetings may be held directly at the Site in order to facilitate first-hand observations and discussions about the cleanup and/or redevelopment activity or scenario:

CP Site
12 Westminster Street
Walpole, New Hampshire

3.0 SITE DESCRIPTION

3.1 Site Location and History

The CP Site is located at 12 Westminster Street. The CP Site consists of two adjoining parcels (Lot 65 and 66 on Map 20), totaling 0.279 acres, within the center of Walpole Center and with no frontage on public streets.

Currently, other than the former Wastewater Pre-Treatment Building, the Site is unimproved and is comprised of asphalt-paved surfaces and the sparsely vegetated footprint of the Former Industrial Building (demolished in 2012).

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).

CP conducted electroplating of metal parts at the Site from 1963 until circa 2006. A 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. 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 Village business district commercial sustainability plan. The Town 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.

3.2 Proposed Cleanup Plan

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 (Walpole Center). The property will become a needed extension of an adjacent public parking lot supporting the Center and is estimated to have capacity to create up to 40 new public parking spaces as well as a small green space area, and E-vehicle charging stations.

In early 2018, an Analysis of Brownfields Cleanup Alternatives (ABCA) / Remedial Action Plan (RAP) was developed for the Site to evaluate various remedial alternatives for the environmental conditions identified at the Site. This document is included in the information repository for the Site. Based on the proposed future use of the Site and the final cleanup goal of minimizing the risk of human exposure to contaminated surficial soils at the Site and improving groundwater quality, the ABCA recommended the “Excavate and Dispose of Soils with SRS Exceedances” remedial alternative.

As part of this alternative the building on-site would be abated of hazardous materials, residual contents within waste water treatment sumps removed and properly disposed of, and the building demolished and properly disposed of to access underlying soils. Regulated soils with contaminant concentrations greater than New Hampshire Soil Remediation Standards (SRS) per Env-Or 600, would be removed from beneath the Wastewater Pre-Treatment Building sumps area and the former 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 and facility acceptance criteria. 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 (GMP) would be required until applicable Ambient Groundwater Quality Standards (AGQS) are met.

Under this Grant and as part of the process, this ABCA / RAP will be reassessed and revised for current conditions and evolving environmental considerations. One such consideration is the presence of PFAS in soils. While not presently regulated in soils in New Hampshire, and not specifically included in waste disposal facility permitting acceptance criteria, in practice receiving facilities are concerned about PFAS in soils and it is appropriate to assess soils for PFAS to minimize the potential for inaccurate bids by contractors or costly change orders during implementation and to determine limits of a possible Activity and Use Restriction for soils left in place below grade and beneath the parking lot. Therefore, grab samples will be collected, including from the wastewater treatment sumps, the former plating line area, and the former Teflon tank area and analyzed for the presence of PFAS. A revised RAP/ABCA will consider the in situ soils results in obtaining cost estimates and in cleanup options evaluations. Once approved by the U.S. EPA and NH DES, the revised RAP /ABCA will be made available for review and comment following the public notice protocol outlined in this Community Relations Plan.

3.3 Summary of Environmental Conditions and Historic Environmental Assessments

The following is a summary of previous investigations conducted at the Site:

Phase I Environmental Site Assessment, 12 Westminster Street, Walpole, New Hampshire; Sanborn, Head and Associates, Inc. (SHA), dated December 2013

SHA’s 2013 Phase I Environmental Site Assessment (ESA) was conducted after the industrial building was demolished; however, a previous Phase I ESA was conducted by Stantec Consulting Services, Inc. (Stantec) in 2006, after the operations of CP had ceased, but prior to the demolition of the industrial building, and is summarized in the SHA report. Stantec interviewed persons familiar with the operations of CP. According to these interviews, waste derived from Site operations was directed to a floor drain within the industrial building which was, at that time, directed to the Waste Water Pretreatment Building. Reportedly, when valves were open in a certain way, untreated process derived wastewater could be released into soils beneath the treatment building. Additional observations by Stantec in 2006 pertinent to recognized environmental conditions (RECs) included extensive staining of the floors and walls within the industrial building. In addition, an area of stained soils was located off the northern end of the

industrial building, apparently originating from an air exhaust vent on the northern wall of the industrial building. At the time of Stantec's 2006 ESA report, an underground storage tank (UST) was located off the southern end of the industrial building and was used for the storage of heating oil. According to SHA's 2013 ESA report, the UST had been removed from the Site and no release was reportedly observed. No formal UST closure documentation was prepared at the time of removal because closure documentation was not a requirement of the NH DES for the size of that UST, reportedly a 500 to 600-gallon tank.

It was SHA's opinion that the Site exhibited the potential for RECs, primarily related to past uses of the property as an electroplating facility with hazardous chemicals regularly stored and treated at the Site. SHA's review of environmental records indicated that multiple inspections by the NH DES, U.S. EPA, and/or Occupational Safety and Health Administration (OSHA) in the late 1990s and the 2000s found sub-standard operating procedures, improper handling and storage of hazardous wastes, and/or conditions that generally posed a threat to human health and the environment.

SHA also noted the presence of a leaking UST (LUST) site, the former Toles Sunoco Station (still an active gasoline retailer as Walpole Village Market), approximately 200 feet east-southeast of the Site and in an inferred upgradient position relative to the Site with respect to groundwater flow. Adverse impacts to the Site from this neighboring LUST site were inferred to be possible.

Given the conclusions of the Phase I ESA, SHA recommended the completion of a Phase II ESA to further assess the potential impacts to Site soils and/or groundwater from former Site uses and/or neighboring properties of concern.

Phase II Environmental Site Assessment, 12 Westminster Street, Walpole, New Hampshire; Sanborn Head and Associates, dated December 2013

In October 2013, SHA completed the field work associated with the Phase II ESA at the Site; including the advancement of six soil borings, four of which were completed as groundwater monitoring wells. Soil samples were field screened for the presence of photoionizable compounds (PICs). Based on field screening results and soil observations, soil samples were selected and analyzed for the presence of volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs), select metals, polychlorinated biphenyls (PCBs) and total cyanide. Groundwater samples were collected at a later date from the newly-installed monitoring wells and submitted for laboratory analysis for the presence of VOCs, select dissolved metals, and total cyanide.

Laboratory analysis of soil samples documented elevated concentrations (as compared to typical "background" values) of certain metals, most notably chromium and copper, in the samples collected from two borings. Detectable concentrations of VOCs, PAHs, and TPH were also present in these samples. Concentrations of target analytes were below applicable SRS, with the exception of total chromium in a sample collected from the vicinity of the former chrome plating line, which exceeded the SRS for trivalent chromium. Although hexavalent chromium was detected in the soil sample at a concentration below the applicable SRS, it was SHA's opinion that the levels of both trivalent and hexavalent chromium in Site soil may pose a health risk in a direct-exposure scenario.

NH DES AGQS were exceeded for groundwater samples for petroleum constituents (benzene, naphthalene, 1,2,4-trimethylbenzene, methyl-t-butyl ether (MTBE)), 1,2-dichloroethane (DCA) and metals (arsenic and nickel).

Based on the measured depth to groundwater across the Site, which ranged from 12 to 20 feet below ground surface (bgs), groundwater was inferred to flow to the west towards the Connecticut River, located approximately 1,700 feet west of the Site. The relatively steep downward gradient from east to west appears to correlate to the depth of clays and silts. The groundwater flow direction mapped by SHA does not coincide precisely with the north-northwesterly flow interpreted by others for the neighboring Toles Sunoco LUST site located approximately 200 feet east-southeast of the Site.

The presence of chromium in soil at concentrations exceeding applicable SRS suggest that process materials may have been released to the environment as a result of the former Site operations. Similarly, concentrations of nickel in groundwater exceeding the applicable AGQS and chromium concentrations above typical background values, suggest that process liquids may have been released to the subsurface via a sump and/or associated subsurface piping.

SHA noted that the elevated concentration of arsenic in groundwater at one monitoring well may be related to the geochemical effects of the petroleum/VOC-impacted groundwater in this area, which was inferred to be, at least in part, from an off-site up-hydraulic gradient source (the aforementioned gasoline station).

New Hampshire Department of Environmental Services Response to Phase II Environmental Site Assessment Findings

In a letter dated March 28, 2014, the NH DES responded to the owner, Mr. Nils Westberg, regarding SHA findings. The NH DES summarized SHA's Phase II ESA findings, offered comments, and provided the discussion summarized below.

Relative to the presence of chromium in soil above SRS, NH DES noted that the proximity to the chrome plating line indicates that regulated contaminants were released to the environment and that the release(s) were likely associated with past electroplating operations. The NH DES concluded that, in accordance with Env-Or 600, remedial measures are required to mitigate the presence of chromium in soil at concentrations exceeding SRS. Because the lateral and vertical extent of the soil contamination has not been fully characterized, additional subsurface explorations are necessary to develop an accurate remedial approach.

The NH DES stated that continued groundwater monitoring under a GMP will be required to address the presence of Site-related contaminants (primarily 1,2-DCA and nickel) at concentrations exceeding their respective AGQS. The NH DES stated that additional groundwater monitoring wells are necessary to define the extent of the groundwater contamination.

Related to the possibility of off-site impacts to Site groundwater quality, the NH DES concurred with SHA's conclusion that the presence of the petroleum-related VOCs exceeding AGQS in Site groundwater (benzene, naphthalene, 1,2,4-trimethylbenzene, MTBE, and TBA) may be attributable, in part, to the gasoline station located approximately 200 feet from the Site.

The NH DES noted that additional information was necessary to further characterize the areas of documented releases prior to Site redevelopment and prior to the approval of a RAP and GMP by the NH DES for the Site.

The NH DES requested that the Site owner submit a scope of work for additional investigation for Department approval. The owner did not undertake additional subsurface investigations as requested by the NH DES.

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) U.S. EPA Brownfields Assessment Program, Ransom conducted a Phase II ESA to collect further information to aid the eventual development of a RAP to protect human health and the environment from impacts associated with documented petroleum and/or hazardous substances, which when implemented would aid in the redevelopment/and productive reuse of the Site. The specific objectives of the Phase II ESA were to further evaluate and investigate the subsurface contaminants detected in Site soils and/or groundwater during the previous investigations conducted by SHA and as documented above; and to further investigate the RECs and/or conditions of environmental concern identified in the Phase I ESA, also conducted by SHA.

The work also conformed with the on-Site characterization requirements stipulated by the NH DES in correspondence dated March 28, 2014 but did not fulfill off-Site characterization requirements for properties located downgradient of the Site.

To evaluate the RECs, eight areas of concern (AOC) were identified on the Site and included the following:

- AOC 1—Chromium Impacted Soil (above SRS);
- AOC 2—Former Industrial Building, Floor Drains;
- AOC 3—Stained Soils, Off Northern End of Former Industrial Building;
- AOC 4—Former Industrial Building, Spray Paint Area;
- AOC 5—Former Heating Oil UST;
- AOC 6—Downgradient of Former Industrial Building and Wastewater Pre-Treatment Building;
- AOC 7—Upgradient Portion of Site (downgradient of neighboring LUST property); and
- AOC 8—Hazardous Building Materials.

Ransom's Phase II ESA included the advancement of soils borings, the collection and analyses of soil samples for field screening for the presence of metals using a x-ray fluorescence (XRF) analyzer and PICs using a photoionization detector (PID), the selection and laboratory analyses of soil samples for the presence of selected metals, PAHs, total cyanide, VOCs and/or TPH-diesel range organics (DRO), the installation of additional monitoring wells and the collection and laboratory analyses of groundwater samples from wells for the presence of dissolved metals, total cyanide, and VOCs.

The following results were reported:

AOC 1—Chromium Impacted Soil (above Soil Remediation Standards)

Both trivalent and hexavalent chromium contaminated soils were documented in the area of the Former Industrial Building chromium plating line at concentrations exceeding SRS. Contaminant concentrations of chromium were generally highest near the ground surface and are a human exposure risk through direct contact, including dust inhalation (if disturbed), dermal contact and ingestion. The soil contamination in excess of SRS was observed to extend to 13 feet below grade, slightly penetrating into a clay and silt unit and into the groundwater table. The chromium release in this area was documented to have impacted the groundwater quality based on elevated concentrations of dissolved chromium in groundwater samples collected from about 30 feet west (down gradient with respect to groundwater flow) of the inferred release area. The volume of impacted soils above SRS was estimated at 250 tons, although additional sampling locations would be necessary to confirm this.

AOC 2—Former Industrial Building, Floor Drains

Other than arsenic which slightly exceeded its SRS, no other metals were detected at concentrations above the SRS, and no total cyanide or VOCs were detected in soil samples from borings advanced near the floor drains in the former plating area and the former anodizing area of the Former Industrial Building.

Analyses of groundwater samples collected from the monitoring well located downgradient of the former plating line area documented dissolved chromium, nickel and cadmium at concentrations exceeding their AGQS as well as arsenic slightly exceeding its AGQS. The presence of metals in the groundwater downgradient of the plating lines appears to be associated with the documented mass of chromium-impacted soils, and a possible inferred mass of nickel-impacted soils likely in the area of the former nickel plating line, which, based on a 1990 facility process diagram was located proximal to the chrome plating line.

The downgradient (westerly) of groundwater with metals impacts exceeding AGQS was not determined.

AOC 3—Stained Soils, Off Northern End of Former Industrial Building

Evidence of coal combustion wastes (dark soils) were noted in near-surface soils in shallow borings advanced in this AOC. Arsenic and PAHs were detected in these shallow soils at concentrations above SRS, which are likely associated with the observed coal slag and cinders.

No AGQS violations for VOCs, total cyanide and dissolved metals were documented in the groundwater sample collected from the monitoring well located down and slightly cross-gradient of the area of dark soils.

AOC 4—Former Industrial Building, Spray Paint Area

No VOCs, total cyanide or metals were detected above SRS in the shallow soil sample submitted for laboratory analyses from this area. No AGQS violations for VOCs, total cyanide, or metals were documented in the groundwater sample collected from the monitoring well located downgradient of this area.

AOC 5—Former Heating Oil Underground Storage Tank

No PAHs or TPH-DRO were detected in soil samples collected from this AOC at concentrations exceeding SRS, and no VOCs were detected in the soil sample collected in this area. In addition, no VOCs were detected in groundwater samples collected from monitoring wells located down and slightly cross-gradient of this area, that would indicate evidence of a significant release of fuel oil.

AOC 6—Downgradient of Former Industrial Building and Wastewater Pre-Treatment Building

Other than arsenic detected at a concentration slightly exceeding its SRS, no metals and no VOCs and no total cyanide were detected in soil samples collected from borings advanced adjacent to and west (downgradient) of the Wastewater Pre-Treatment Building and the Former Industrial Building.

Dissolved contaminants indicative of releases of metals waste were detected in groundwater downgradient of the Wastewater Pre-Treatment Building and the Former Industrial Building. Nickel and cadmium were detected at concentrations slightly exceeding their respective AGQS in the vicinity of the sumps and associated wastewater piping for the Wastewater Pre-Treatment Building and suggest a modest ongoing source to groundwater in that area. Higher concentrations of dissolved chromium and nickel, and to a lesser extent cadmium and arsenic were detected in groundwater downgradient of the Former Industrial Building plating lines and appear to be associated with areas of known contaminated soils in the former plating area.

MtBE and other gasoline constituents were detected in groundwater samples collected from multiple locations downgradient of the Site building and former building, including MTBE above its AGQS at one location. The source of these impacts is inferred to be located off-site to the east per AOC 7, below.

AOC 7—Upgradient Portion of Site (Downgradient of Neighboring Leaking Underground Storage Property)

Elevated field readings for PICs were measured for soil samples collected from depths within the upper portion of the seasonal groundwater table for borings advanced on the eastern and southern (upgradient) portions of the property. Naphthalene was detected at a concentration above its SRS in a soil sample from one upgradient boring. The suite of petroleum-related contaminants were similar for each of the two soil samples that were analyzed, which likely indicates the same source.

Benzene, MtBE, naphthalene, and 1,2,4-trimethylbenzene were detected in groundwater samples collected from upgradient monitoring wells indicates an upgradient gasoline source for these contaminants.

AOC 8—Hazardous Building Materials

Hazardous building materials were identified in the Hazardous Material Inventory (HMI) report and include small quantities of asbestos-containing window glazing or presumed asbestos containing materials, presumed PCB-containing fluorescent light ballasts, mercury containing light bulbs, and one thermostat switch that may contain mercury. In addition, waste solids with high concentrations of metals and cyanide were identified in the wastewater pre-treatment sumps which will require proper decommissioning prior to demolition.

On November 22, 2016, the NH DES corresponded with “Stakeholders” and requested analyses of an emerging contaminant commonly known as PFAS. The PFAS perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) have newly established AGQS.

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 U.S. EPA Brownfields Assessment Program, Ransom conducted the Supplemental Phase II ESA to collect further information to aid the eventual development of a RAP to protect human health and the environment from impacts associated with documented petroleum and/or hazardous substances, which when implemented will aid in the redevelopment/and productive reuse of the Site property. Note that based on an initial reporting of the results of this work to the NH DES and to other stakeholders, two additional investigations were conducted: one contracted through the NH DES, one contracted through the Site owner (the Estate of Nils Westberg). The additional investigation findings were also summarized in the Supplement Phase II ESA report.

Of the eight AOCs previously identified for the Site, three AOCs had RECs requiring additional investigation to provide information to support remedial planning as noted below.

AOC 1—Chromium Impacted Soil (above Soil Remediation Standards) – Former Plating Lines Area

The scope of this Supplemental Phase II ESA included additional investigations to better estimate the mass of chromium-impacted soils with contaminant concentrations above SRS, to identify a potential source mass of nickel (and cadmium) impacted soils in the area of the former nickel plating line, and analyses of groundwater for PFAS, an emerging contaminant of concern, known to be used as a vapor suppressant for plating baths.

AOC 2—Former Industrial Building – Former Waste Water Piping Area

The scope of this Supplemental Phase II ESA included additional investigations to identify a potential source mass of nickel (and cadmium) impacted soils in the area of the former nickel plating line (as noted in AOC 1, above), confirm groundwater quality downgradient of the current and former building source areas and assess for potential PFAS impacts to groundwater, and assess soil and groundwater quality downgradient of the industrial wastewater lines buried between the Former Industrial Building and the Wastewater Treatment Building for metals impacts.

AOC 6—Downgradient of Former Industrial Building and Wastewater Pre-Treatment Building

The scope of this Supplemental Phase II ESA included additional investigations to confirm groundwater quality downgradient of the Former Industrial Building and the Wastewater Pre-Treatment Building (as noted under AOC 2), and to evaluate downgradient and off-site groundwater quality (with the exception that the downgradient property owner declined authorization to analyze groundwater for the presence of PFAS).

The following results are indicated for each AOC that was further assessed as part of this investigation:

AOC 1—Chromium Impacted Soil (above Soil Remediation Standards)

Both trivalent and hexavalent chromium contaminated soils were documented in the area of the Former Industrial Building chromium plating line at concentrations exceeding SRS. Neither nickel nor cadmium were detected at concentrations above their SRS, and samples with the highest XRF field screening readings were selectively submitted for analyses. No source mass was identified for these contaminants of concern in Site soils.

XRF field screening results correlated well to total chromium laboratory data and provided a good indication of the vertical distribution of chromium in each boring. Based on the distribution of the elevated chromium, the plating line area at the ground surface in the southeast corner of the former building footprint appeared to be the primary source.

Based on the mapped distribution of chromium, elevated contaminant concentrations extend about a foot downward into a silty clay unit encountered about 12 feet below grade beneath the east edge of the Former Industrial Building footprint area sloping down to about 17 feet below grade beneath the west edge of the Former Industrial Building. The volume of impacted soils above SRS, and therefore targeted for remediation/removal, was estimated at 380 cubic yards.

Synthetic precipitation leaching procedure (SPLP) analyses for chromium, nickel, and cadmium were conducted on selected soil samples within the saturated zone to assess the likely leaching potential for moderate to low-concentration metals-impacted soils. In general, SPLP chromium detections were lowest laterally away from the concentration hot spot and decreased by a factor of 2 at the downgradient extent of the mass targeted for removal. The SPLP data supports that removal of soils to concentrations meeting SRS will generally result in a significant decrease in the likelihood that remaining soils will act as an ongoing source to groundwater impacts.

AOC 2—Former Industrial Building

As noted above neither nickel nor cadmium were detected at concentrations above their SRS in soils samples collected and analyzed from the potential residual source areas; therefore, no quantifiable source mass was identified for these contaminants of concern. Metals concentrations detected in soils samples from a boring advanced adjacent to industrial wastewater lines buried between the Former Industrial Building and the Wastewater Pre-Treatment Building identified minor evidence of a release of metals in those soils but did not identify contaminant concentrations that would indicate a local source likely to contribute to ongoing impacts to groundwater.

Groundwater quality for the samples collected from wells downgradient of the Former Industrial Building and the Wastewater Pre-Treatment Building confirmed results from 2015 with the highest concentration of dissolved metals located downgradient of the former plating lines, and with lesser concentrations proximal to the Wastewater Pre-Treatment Building sumps. Groundwater quality for the sample collected from the well installed proximal to the waste water lines was consistent with Site-wide spatial dissolved contaminant gradients and did not support a secondary source in that immediate area.

PFAS telomeres PFOS and PFOA were detected at concentrations above their AGQS at that time for total PFAS and for each telomere, individually, which has since been revised downward and standards have been added for two additional PFAS compounds. The highest concentrations of PFAS were detected in the groundwater sample collected from the monitoring well located downgradient of the plating line area and lesser concentrations were detected in the sample collected from the monitoring well located

downgradient of the Wastewater Pre-Treatment Building sumps. Because a former off-site fire where aqueous film-forming foam (AFFF) was likely used was located upgradient of the plating lines, it was concluded that the PFAS contaminant distribution could be consistent with an on-Site fume suppressant release source, an offsite fire-fighting foam source, or a combination of the two.

AOC 6—Downgradient of Former Industrial Building and Wastewater Pre-Treatment Building

Groundwater quality for the sample collected from a monitoring well installed on Tax Map 20 Lot 63, located approximately 55 feet west (downgradient) of the Site, did not document AGQS violations for Site contaminants of concerns. The sample was not analyzed for PFAS, per requirement of that property owner.

Per the request of a nearby homeowner, a groundwater sample was collected from a dug well used for irrigation water located in the basement of 69 Main Street, 175 feet to the north of the Site. Lead was detected at a concentration above its AGQS. Other than nickel and barium at very low concentrations, no other Resource Conservation and Recovery Act (RCRA) metals were detected. Lead has not been detected at elevated concentrations in soils or groundwater at the Site. The water sample was not analyzed for PFAS.

Based on an initial reporting of the results of this work to the NH DES and to other stakeholders, two additional investigations were conducted:

1. Groundwater samples were collected from selected wells and analyzed for the presence of PFAS. Two of the wells were selected based on NH DES information that an above ground storage tank for storing Teflon (coating) was located in the northwest corner of the Former Industrial Building. The sampling, conducted by SHA under contract to the NH DES, confirmed PFAS compounds above AGQS and a likely second source of PFAS associated with the former Teflon tank.
2. Two offsite monitoring wells were installed, and groundwater samples were collected from selected wells and analyzed for the presence of PFAS. The two new wells were installed to assess the down gradient extent of PFAS impacts above AGQS in a northwesterly direction and to assess for possible impacts associated with the use of AFFF to suppress a fire on the easterly adjoining property. PFAS compounds were detected in the two newly installed wells at concentrations that did not exceed AGQS. These results helped to define the limits of the groundwater management zone (GMZ, i.e. the area/mass of water impacted above AGQS). It should be noted that the static groundwater level data collected as part of the work appear to suggest a localized steep southwesterly gradient to the southwest of the Former Industrial Building, which if further substantiated, could necessitate an additional monitoring well to the southwest to confirm the limits of the GMZ in that direction.

Analysis of Brownfields Cleanup Alternative / Remedial Action Plan

As part of the ABACA / RAP, three alternatives were considered to remediate soils at the Site contaminated by plating processes, and to remediate groundwater at the Site, including: “Monitored Natural Attenuation” (Alternative 1); “Excavate and Dispose of Soils with SRS Exceedances” (Alternative 2); and “Excavate and Dispose of Soils to Reduce Leaching Potential, Manage Soils in Place” (Alternative 3). These alternatives were evaluated using the following criteria: Overall Protection

of Human Health and the Environment; Technical Practicality; Ability to Implement; Reduction of Toxicity, Mobility, and Volume; Short Term Effectiveness; Resiliency to Climate Change Conditions; and Preliminary Cost.

These remedial alternatives were proposed with the understanding and consideration that the community's preferred future use of the Site is as a parking lot in support of the Village.

Alternative 2 – Excavate and Dispose of Soils with SRS Exceedances was the recommended alternative because it protect human health and the environment and is effective, technically feasible, practical, and provides a construction site ready for redevelopment as a proposed parking lot in support of the Walpole Village needs. The ABCA / RAP noted that regional soil disposal facilities were wary of the possible increased costs of accepting PFAS contaminated soils. As a result, the ABCA / RAP noted that the cost estimates provided in the report may increase (or decrease) and the extent of that possible change in cost was cited as unknown.

The ABCA / RAP noted that because possible/probable uses of PFAS on the Site associated with past facility operations were highly likely to be co-located with the plating and waste management processes that were also driving the clean-up, the recommended remedial action is anticipated to mitigate probable PFAS source soils that could be present on Site. The ABCA / RAP also noted that the NH DES may require additional investigations to address the spatial extent of PFAS groundwater impacts [it did, as noted below]; assess whether a possible upgradient source (the reported likely use of AFFF by the Walpole Fire Department) is contributing to PFAS groundwater impacts [this work was done, as noted below]; and assess whether stack emissions from the CP facility may have impacted nearby surface soils. Further, it was noted that:

1. While the proposed remediation is a proactive remedial approach that will probably mitigate PFAS impacts, the presence of PFAS, and the limited spatial data pertaining to PFAS groundwater impacts and no laboratory data on PFAS soils impacts does add uncertainty relative to possible additional required investigations, remediation, liability, disposal costs, and duration of GMP-required groundwater monitoring.
2. Based on the recent findings of a second on-Site probable source (area of the former Teflon tank), in an area not previously targeted for soil excavation, removal of an additional PFAS source in that area may be warranted at some point in the future, if and when leaching-based soils standards are established by the NH DES.
3. The recent investigations on the Site and adjoining properties have helped to define the limits of the GMZ, and the laboratory data support that contaminant concentrations attenuate within the study area. However, an additional monitoring well may be needed to the southwest of the PFAS release areas to assess groundwater quality in that direction.

Please note that the summary provided above does not include all of the available information pertinent to the Site and this Cleanup. The reader is encouraged to review files available in the information repository, and/or at the NH DES OneStop, as well as the results of work to be completed in order to become more familiar with Site conditions, past findings, the proposed cleanup and recommendations.

4.0 COMMUNITY BACKGROUND

The Town of Walpole historically flourished as an agricultural community on the rich soils of the Connecticut River, but changes to the global economy have diminished the prominence of farming and transformed the economy from goods producing to service-providing. With the exception of three distinct village areas (including Walpole Center) the town is mostly rural. Walpole Center hosts a mix of housing, commercial, office and municipal land uses and the subject brownfield site, the former CP site, is the only industrial land use in the target area. Walpole Center is one of the “older” communities in Cheshire County (median age is 59.6)¹ and is the epitome of what the New Hampshire Center for Public Policy has cited as a trend of aging population coupled with young people leaving the State for more economic opportunities.

As such, Walpole Center is economically vulnerable. Revitalizing our village areas, while preserving our rich, heritage farmland will help revitalize Walpole. To achieve this 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. Increasing vitality in its village areas requires more creative approaches. Improving walkability by reallocating road space between walkers, bicyclists and motorists is one strategy to foster village vibrancy and economic activity. Parking is another important objective. Parking need is a reality as transit service is generally poor in New Hampshire, and the “on-street” parking that shops and offices rely on for employees and customers detracts from the walkability of our village areas.

Therefore, the redevelopment of the CP Site into off-street, in-fill parking supports in-town employers with needed employee and shopper parking. The parking will add as much as 40 spaces to the adjoining parking lot and reduce the “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 CP Site 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.

5.0 COMMUNITY INVOLVEMENT

5.1 Initial Public Meeting and 30-Day Public Comment Period

To date, and prior to applying for the U. S. EPA Brownfields Cleanup Grant, 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.

Under this Cleanup Grant, an initial public meeting will be held at the Selectboard Office once the final/updated ABCA / RAP has been through NH DES and U.S. EPA review; likely in April (the date to be formally noticed in late March or early April). The purpose of this public meeting will be to discuss the general Brownfields process, the results of site assessment work completed to date, the findings of the ABCA (and any modifications to the cleanup approach that has already been approved by the NH DES), the potential benefits of Brownfield site redevelopment, and to solicit input from the public on their concerns and desires for the Site. The public meeting announcement and availability of the ABCA / RAP will be advertised in the local newspaper (Keene Sentinel), the Walpolean, the Town web page and on Walpole Post Office and Selectboard public bulletin boards. The legal advertisement will announce the start of a 30-day comment period on the remedial alternatives presented in the ABCA / RAP for the Site.

5.2 Stakeholder Meetings

The following community partners and stakeholders, the “Brownfield Cleanup Task Force” as noted in the table below, will provide meaningful support and guidance to the Town:

Partner Name	Point of Contact	Specific Role in the Project
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)	Not Listed	Stakeholder input on clean-up planning and implementation, redevelopment outcomes.
Walpole Senior Citizens Group (Village target population)	Jack (John) Pratt Jprat8369@msn.com	Target population voice, liaison to ensure Sr. community needs are met.
Walpole Conservation Commission	Alicia Flammia leeshaaa@gmail.com	Representing Town environmental interests.
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.

On October 20, 2019, a subset of the Cleanup Task Force along with Town representatives, supported by the U.S. EPA Project Officer, met to review submitted statements and proposals from Qualified Environmental Professionals (QEP) that were solicited as part of a competitive process in accordance with 40 CFR 30, for the purpose of selecting a QEP (Ransom).

Additional Cleanup Task Force meetings will be held as necessary and at the discretion of the Town; however, the focus of public outreach will be at monthly Town meetings and several dedicated public outreach meetings to provide a forum for all citizens and stakeholders.

5.3 Periodic Project Status Meetings

Three dedicated meetings are planned during the grant period. As noted in section 5.1, the first public meeting will be held to discuss the final ABCA / RAP, proposed cleanup actions, sequencing of work and Site reuse. A second public meeting will be held after the selection of a remediation contractor to review the detailed anticipated implementation schedule and to review project oversight roles (Town, QEP, Contractor, NH DES), communications protocols, and safety measures. The third public meeting will be held at the completion of the remediation and Site restoration. The project completion meeting will recap the remediation efforts, highlight the redevelopment potential for the Site, and allow a forum for public discussion of final development plans and redevelopment completion schedule.

Notice of dedicated public outreach meetings and meeting agendas will be advertised/posted in the Walpolean, the Town web page, and on the Walpole Post Office and Selectboard public bulletin boards in advance of the meetings. Responses to previously submitted questions or concerns will be made during the monthly public meetings and/or in writing posted on the web page (per Section 6.0).

5.4 Key Community Concerns

To date, the public has voiced encouragement and support for the proposed remediation and reuse plans. Abutters are interested in safe implementation of the ABCA / RAP, and the requirement for, and implementation and monitoring of protocols to mitigate potential exposure risk as the Site evolves from Brownfields to a Town resource.

6.0 CONTINUED COMMUNITY INVOLVEMENT

The Town will utilize its partnership with the Cleanup Task Force to provide continued community stakeholder involvement for the project, as needed.

The NH DES has provided regulatory oversight of the Brownfields assessment process and will oversee cleanup through the NH DES Brownfield Program Project Manager; and the U.S. EPA will provide grant programmatic compliance guidance and direction, when needed.

The Selectboard will provide updates and solicit community input in scheduled Selectboard meetings on a monthly basis to keep communication lines open with the Town. Responses to questions or concerns will be made during the public meetings and in writing posted on the web page. Ransom and the Town will establish an email list that includes project stakeholders and interested parties. This list can be expanded upon and also utilized to keep interested parties current on the project status.

As noted above, public notices will be posted in the Walpolean, the Town web page and on Walpole Post Office and Selectboard public bulletin boards. Responses to questions or concerns will be made during the public meetings and in writing posted on the web page.

In conformance with the Brownfields Cleanup Grant requirements, the public notice of the initial dedicated public meeting will also announce that the Town information repository for this project, including for environmental assessments, ABCA / RAP, and other project information (meeting minutes, etc.), is located on the Town website, and is available for viewing during the Town business hours at the Town Hall.

Public comments regarding the project can be submitted at the public meetings, by email to Sarah Downing (sdowning@walpolenh.us), or in writing to the following address:

Peggy Pschirrer
Town of Walpole
PO Box 729
34 Elm Street
Walpole, New Hampshire 03608

7.0 SCHEDULE

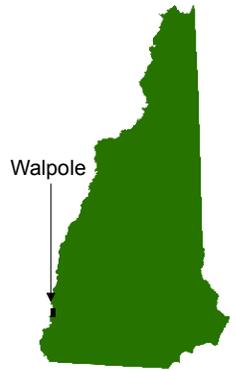
The following schedule presents the tentative or proposed timeline related to the public outreach and involvement (dedicated public meetings are in *italics*) and project milestones for the proposed cleanup at the Site:

1. January of 2020 – the Town and Ransom will submit the Community Relations Plan to the U.S. EPA for review and to the NH DES for information purposes.
2. Early February - Ransom will submit to the NH DES and U.S. EPA for review prior to finalization a draft Site Specific Quality Assurance Plan detailing proposed environmental media sampling and analyses protocols and standard operating procedures to ensure that the data collected meets project needs and complies with NH DES and U.S. EPA requirements.
3. February of 2020 – the Town and NH DES and U.S. EPA will make final Community Relations Plan available at public repositories (Town Hall and Town web page) and announce availability of the plan.
4. March of 2020 – Ransom will collect soils concrete and sump residues samples for PFAS, and other analyses as may be warranted and prepare a data submittal report for Town review, finalization and posting.
5. April of 2020 – Ransom will complete a draft final ABCA / RAP for review by the Town, the NH DES, the U.S. EPA, and the community.
6. April 2020 - Town announces notice of availability of the ABCA / RAP for public review to be maintained within the information repository for the Site. A legal/public notice announcing the availability of plans/environmental documents for the Site and the scheduled public meeting will be published in the local paper (Keene Sentinel), the Walpolean, the Town web page and on Walpole Post Office and Selectboard public bulletin boards in April, thus marking the beginning of a 30-day public comment period on the proposed cleanup plans.
7. *April 2020 – Public Meeting to Present ABCA and Receive Comments*
8. Summer 2020 - Draft Specification Packages and Bid Documents are prepared and submitted for review to Town and NH DES.
9. Fall 2020 – Completion of final permitting, work plans, construction design, and bid specification package, and solicitation of competitive cleanup construction bids.
10. Fall 2020 – Contractor selection and contracting.
11. *Winter/Spring 2021 Pre-construction/remediation Public Meeting*
12. Summer 2021– Cleanup construction project will begin with periodic public project status meetings, as previously noted under Sections 5.0 and 6.0 above.

13. *Summer/Fall 2021 – Project Completion and Public Meeting.*

Please note that periodic public notices will be published in local newspapers regarding the overall project status and/or changes to the proposed project schedule, as necessary.

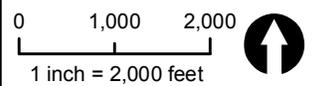
Regional Locator Map



Notes

1. Data Source: USGS National Map Seamless Server, 24K DRG, 1/3" NED
2. USGS Quad Name: Walpole
3. Latitude: 43° 04' 48" N
 Longitude: 72° 25' 36" W
 UTM Northing: 4772913 mN
 UTM Easting: 709481 mE

Scale and Orientation



Prepared For

Town of Walpole
 34 Elm Street
 Walpole, New Hampshire

Site Address

Former Central Plating Site
 12 Westminster Street
 Walpole, New Hampshire

141.05051 Feb 2020

Figure 1
 Site Location Map

Legend & Notes

Chromium (Cr) Exceeds SRS at Surface and Deeper

At Depth only

At Surface and Deeper - Inferred High Concentration Cr.

At Depth Only

Site Boundary

300 Series Monitoring Well

200 Series Soil Boring/ Monitoring Well

200 Series Soil Boring

Previously Existing Monitoring Well

Soil Boring

Boring/ Monitoring Well (Cr Concentration mg/kg)

1,400

Waste Sample

Former Sump

Former Floor Drain

Sewer Manhole

Sewer Line

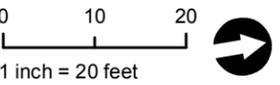
Water Line

Lot Line (Approximate)

Cross-Section

- Notes
1. Site Plan based on VCGI Orthophotography, Tax Map 20, and site surveyed plans for two adjoining properties. Figure from SWRPC RAP.
 2. Some features are approximate in location and scale.
 3. This plan has been prepared for Southwest Region Planning Commission. All other uses are not authorized unless written permission is obtained from Ransom Consulting, Inc.
 4. ENV-Or600 Soil Remediation Standard (SRS) for Cr III is 1,000 mg/kg and for Cr VI is 130 m/kg. Red circle indicates a SRS exceedance for Cr.

Scale & Orientation



Prepared For

Town of Walpole
34 Elm Street
Walpole, New Hampshire

Site Address

Central Plating Site
12 Westminster St.
Walpole, New Hampshire

201.05001 | Feb 2020

Figure 2
Site Plan - Chromium Distribution in Soils

