

**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.

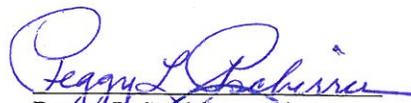
Mr. Adams asked if the Federal government's shutdown would put a delay on the project. Mrs. Pschirrer said that was unknown. Ms. Flammia said her company was assuming that all grant deadlines were on track and that the submittal dates remained in effect. However, the EPA shut-down has caused all active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

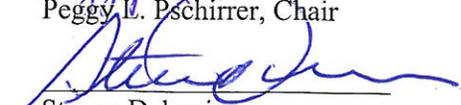
Mrs. Ellen Adams asked if the groundwater flow from the site would carry contaminants onto their property. Mr. Rickerich stated that, because the groundwater flow on the site was toward the Connecticut River, it was unlikely that contaminants would enter their property from groundwater flow. Furthermore, 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.

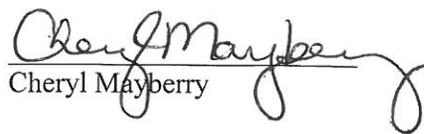
Mrs. Pschirrer stated that if there were no further questions, the meeting would be adjourned. She encouraged all members of the public to submit any written comments about the cleanup project to the Selectboard by January 24, 2019. The Selectboard would answer all written questions and concerns. Ms. 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.)