



**RAYMOND WATER PLANNING
COMMITTEE 11/26/22
RE: REX TANNERY CONCERNS**

Raymond Water Planning Committee
RE: Rex Tannery Concerns

11-26-2022

Open Letter:

While conducting research related to Planning Board work, it was discovered that a portion of the Rex Tannery site may have been overlooked during remediation and areas of concern appear to remain unaddressed.

In the original GZA Site Investigation from 2004 sediments from the bottom of Lagoon #3 were characterized as " GZA concluded that these concentrations were indicative of significant risk to human health..." testing that should have been done after a controlled removal of the contaminated dam appears to have never been conducted. Additionally, sediments from Wetland C (Cahill property abutting the Lamprey River Elementary School) on the federally protected Lamprey River " ...have been significantly impacted by the metals arsenic and chromium...". Recommended additional testing and development of plans for remediation do not appear to have been conducted.

This is particularly concerning as a mechanically excavated dam breach on Lagoon #3 was reported to have occurred between Jan and Sept of 2022 , further investigation concerning this breach is imperative as the original sediments contaminated from the Rex Tannery were never removed from Lagoon #3. The level of PFAS in this area is unknown but concentrations in nearby monitoring wells suggest it should be an area of substantial concern.Lagoon #3 is not located on Town property.

Groundwater testing has long ceased at monitoring well GZ-4C and an easement to access the GZ-4C for said testing does not appear to be in the current deed as originally requested. In 2004 the GZ-4C test detected barium levels 15 times the reporting limit. A subsequent test picked up additional contaminates, there is no current data from this well, it has never been tested for PFAS, and this well is not located on Town property.

PFAS or " forever chemicals" were only recently added to the monitoring on the Rex Tannery site . New recommendations on Health Advisory Limits from the EPA have greatly reduced the amount of PFAS considered to be a safe level. The impact of the remediation for the original list of contaminants has been generally successful and proof that the brownfield capping technology is a viable solution. However, PFAS contamination which was not part of the original remediation has been detected outside the Groundwater Monitoring Zones as high as 200,000 times the interim HAL of .004 ng/l (parts per trillion). This was reported from well # GZ-101 next to the Lamprey by Wetland B and is at a concentration that exceeds the previous PFAS test on that well by nearly 300%.

The Water Planning Committee is dedicated to making sure that all information related to Raymond's Water is reported back to the Planning Board in public for the purpose of informing the board so it can make recommendations and decisions based on factual data and to make sure that deadlines and responses are being made in a timely and efficacious manner in order to safeguard the health and well-being of our community and to be good stewards of the aquifer for our neighboring communities.

I would like to clear that no insinuation of wrongdoing or neglect is being made , only that areas of concern remain and should be addressed with all the speed and diligence required to address the contamination.

Respectfully,

Jim McLeod

Raymond Planning Board, member
Water Planning Committee, member

GZA SITE INVESTIGATION 2004 INTRODUCTION



- Deeply buried fill near Old Manchester Road and Wight Street: It was concluded that deeply buried leather scraps extend off Site under Old Manchester Road, and possibly also onto the adjoining residential property west of the Site. It was further concluded that fill containing ash and leather may extend under Wight Street to the property occupied by the Wight Street Apartments. Based on groundwater analytical data collected from GZ-1, which is located within the area of deeply buried leather scraps, groundwater in this area had been impacted by total chromium (69 µg/L) at moderate levels below its GW-1 standard (100 µg/L), which is equivalent to the Ambient Groundwater Quality Standard that is enforceable by New Hampshire Groundwater Protection Rules Env-Wm 1403.

Granular fill cover over the deeply buried leather scraps was observed to range from approximately 1 to 4 feet at test pit locations; as such, the buried leather scraps were deemed accessible for unrestricted use of the property. Samples of the fill containing leather were found to contain chromium concentrations above the Method 1 S-1 standards, but well below the S-1 Direct Contact Risk-based Standards for trivalent (44,300 milligrams per kilogram [mg/kg]) and hexavalent chromium (88 mg/kg).

- Near-Surface fill containing leather in vicinity of the concrete foundation slab, and Lagoons 1 and 2: GZA concluded that beneficial re-use of the Site will likely require removal and/or relocation of near-surface fill in the vicinity of the concrete foundation slab and Lagoons 1 and 2.
- Concrete foundation slab, subsurface drainage and receptacles, and associated impacted materials: GZA concluded that beneficial re-use will likely require removal of the concrete foundation and slab, asbestos-containing concrete pipe on Lot 50, and subsurface drainage and receptacles on Lot 17.
- Impacted materials within trench, and in railroad loading platform area: Sediments impacted with elevated levels (exceeding RCMP S-1 and/or consensus-based probable effect concentration [PEC]) of chromium are present in the trench between Lagoon 3 and Wetland A, and soil impacted with elevated levels of lead, polychlorinated biphenyls (PCBs), and polynuclear aromatic hydrocarbons (PAHs) are present at the railroad loading platform. GZA concluded that the maximum horizontal extent of the impacted trench sediments is likely the area of the trench. Available analytical data suggested that the impacted sediment and soil is non-hazardous.

Characterization of Lagoon #3 in 2005 "significant risk to human health"



- Lagoon 3 berms and sediments: Leather scraps were observed by GZA on the face of the western berm, and may also comprise the interior of the berm. No leather scraps were observed on the face of the northern berm; however, GZA concluded that leather may be present on or within the berm.

Sediments at the bottom of the eastern portion of Lagoon 3 in the vicinity of L3-SD-8, which is near the presumed location of the former outfall, contain arsenic at concentrations above background, S-1, and the PEC for arsenic, as well as chromium at concentrations above its PEC. GZA concluded that these concentrations were indicative of significant risk to human health and/or high risk of adverse effects on sediment aquatic life.

Characterization of Wetland "C" (proximity to Amprey River Elementary School) previous ests already detected heavy metals. Likely from Lagoon #3.



- Wetlands B and C: Wood debris was observed by GZA in the area of SD-7 and SW-7 (culvert outfall) within the area of Wetland B. Metals have been detected during historical and current studies at elevated concentrations in sediments from Wetlands B and C. GZA concluded that it was likely that the elevated metals levels are attributable to releases of wastewater from the Site, either directly from the facility (Wetland B) or via overtopping and/or breaching of the western dam of Lagoon 3 (Wetland C).

berms may destabilize the berms and, therefore, are not recommended. Non-intrusive geophysical methods, such as ground penetrating radar, could probably identify leather scraps within the berms. Any fill containing leather should be characterized and disposed properly.

Sediments at the bottom of the eastern portion of Lagoon 3 in the vicinity of L3-SD-8, which is near the presumed location of the former outfall, contain arsenic at concentrations above background, S-1, and the PEC for arsenic, as well as chromium at concentrations above its PEC. These concentrations indicate significant risk to human health and/or high risk of adverse effects on sediment aquatic life. Supplemental sampling/testing for assessment of the extent of sediment impact and further characterization of the sediment is needed to further evaluate alternatives, and would be more cost effectively performed after the dams have been removed and surface water in the lagoon has been lowered. This may be why the testing and remediation was not done.



Lagoon #3 is not segregated from the public, remains unremediated

→ If the Lagoon area is to be returned to its natural state, and the Site is to be fully accessible by the general public, then the most feasible remedial alternative for the sediments in the area of L3-SD-8 may be removal, and on-Site landfilling or off-Site disposal. Alternatively, a human health and ecological risk assessment, based on supplemental sediment quality and toxicity bioassays, could be performed to assess whether the sediments can remain in-place; however, mitigation of the sediment would be required following the risk assessment, if significant risk is determined.

Soils do remain in place no remediation or AUR

→ If the soils remain in-place following a risk assessment or are landfilled at the Site, then future use of the area containing the impacted sediments would need to be addressed by an Activity and Use Restriction incorporated into the deed of the property.

9.6 WETLANDS B AND C

Wood debris was observed in the area of SD-7 and SW-7 (culvert outfall) within the area of Wetland B. The extent of the wood debris should be determined, and its impact to surface water assessed.

Previous studies concur with current tests and contamination source for Wetland C (LRES/ Cahill) is from Lagoon #3

→ Metals have been detected during historical and current studies at elevated concentrations in sediments from Wetlands B and C. It is likely that the elevated metals levels are attributable to releases of wastewater from the Site, either directly from the facility (Wetland B) or via overtopping and/or breaching of the western dam of Lagoon 3 (Wetland C).

SI characterizes Wetland C sediment "significantly impacted" by arsenic and chromium

→ Sediments in the vicinity of Wetland C sample SD-6 have been significantly impacted by the metals arsenic and chromium, which were detected at concentrations exceeding their S-1 standards and/or PECs; and possibly also by mercury, nickel, and SVOCs, which were detected at concentrations exceeding their TECs.

No record of this ever being completed

→ A large area of sediments in Wetland B extending at least from SD-9 to SD-11 has been significantly impacted by the metals arsenic, chromium, and lead, which were detected at concentrations exceeding their S-1 standards and/or PECs; and possibly also by cadmium and mercury, which were detected at concentrations exceeding their TECs.

→ The extent of impacted sediments in Wetlands B and C is unknown, and needs to be further characterized. It is likely that remediation of the most significantly impacted sediments will be needed to address sediments posing unacceptable risks to human health and the environment. A risk assessment would assist in the identification/delineation of areas of sediments that do not pose unacceptable risks.



DOWNTOWN RAYMOND



Contamination from here (1) was held back by dam here (2) a breach would outflow here (3) and discharge into the Lamprey River at Wetland C (4). This occurred when the dam was busted before 9/28/22 -date TBD.

← = dir of flow

----- = prox. lot line of 120 and 120-1

● = Orchard St. Water Tank

NOT TO SCALE

MODIFIED FROM NUS SSI, 1990

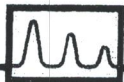
LEGEND

- | | | | | | | | |
|-------|--|---|-----------------|---------|---|---------------------------------|--------------|
| ----- | PROPERTY BOUNDARIES | 🌲 | WOODED AREAS | ===== | PAVED ROAD | WESTON/ARCS
SAMPLE LOCATIONS | |
| → | INTERMITTENT STREAM | 🌿 | WETLANDS | ----- | UNPAVED ROAD | ■ SD-1 SEDIMENT | |
| → | RIVER FLOW DIRECTION | — | CONDUITS | - - - - | TRAIL | ▲ SW-1 SURFACE WATER | |
| □ | RESIDENCES | ● | BEDROCK OUTCROP | ~~~~~ | APPROXIMATE TOPOGRAPHIC CONTOURS
W/APPROX. ELEVATION ABOVE SEA LEVEL | ▨ | BERMED AREAS |
| ⊕ | PIEZOMETER INSTALLED BY BALLESTERO, 1990 | | | | | | |

**SITE SKETCH
REGIS TANNERY
RAYMOND, NEW HAMPSHIRE**



FIGURE 3



LABORATORY REPORT

PAGE 229 OF 628 GZA SI 2004

Eastern Analytical, Inc. ID#: 41497

Client: GZA GeoEnvironmental, Inc. (NH)

Client Designation: Rex Leather / 23468

Client Sample ID: GZ-4C

Lab Sample ID: 41497.03

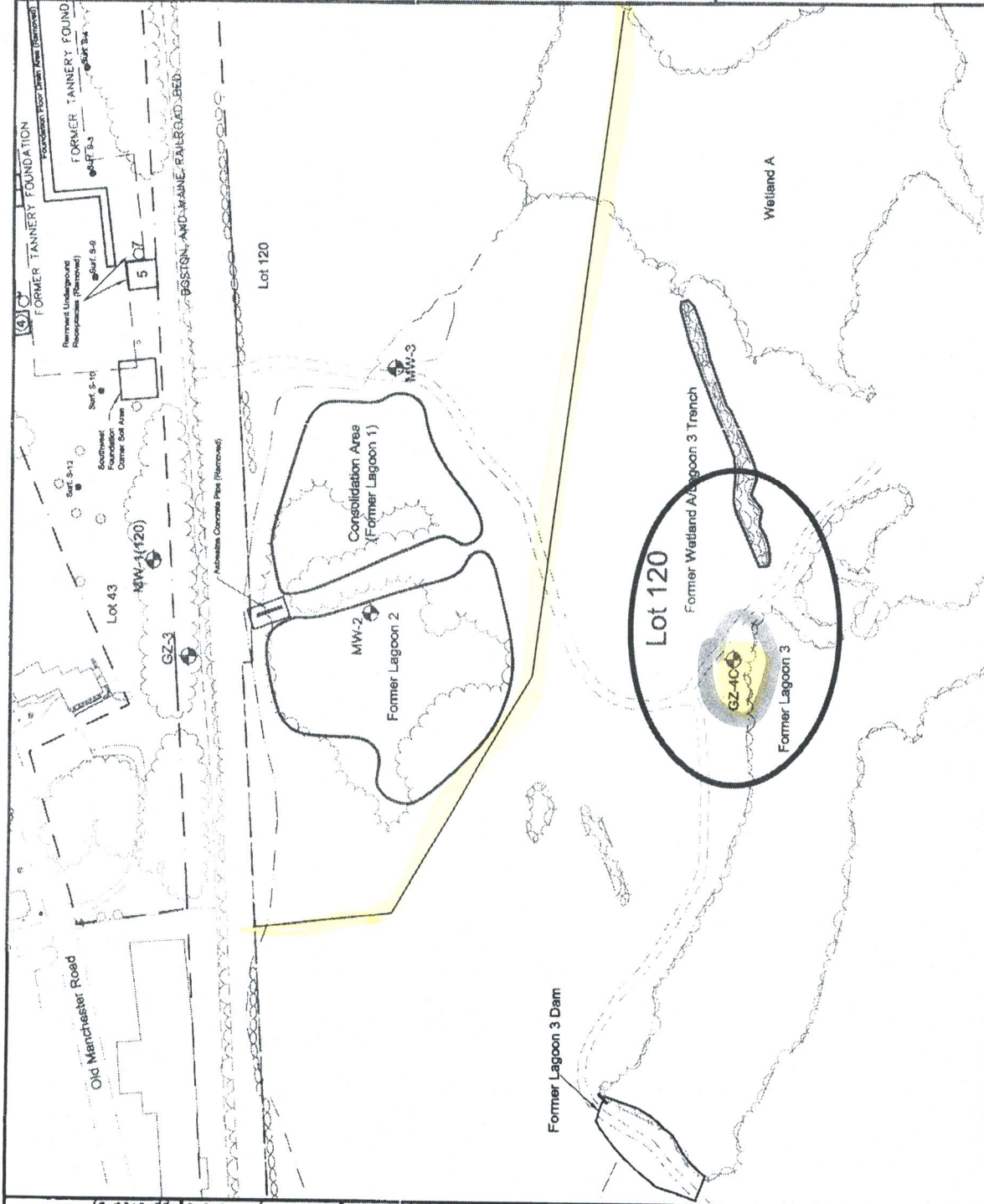
Matrix: aqueous

Date Sampled: 4/9/04

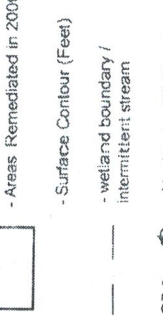
Date Received:		Reporting Limit	Dilution Factor	Units	Date Analyzed	Time Analyzed	Date Prepared	Method	Analyst
	4/12/04								
Arsenic	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Barium	0.015	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Cadmium	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Chromium	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Lead	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Mercury	< 0.0001	0.0001	1	mg/L	4/20/04	23:19		200.8	DS
Selenium	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS
Silver	< 0.001	0.001	1	mg/L	4/20/04	23:19		200.8	DS

BARIUM DETECTED AT 15 TIMES THE REPORTING LIMIT ON GZ-4C

FROM GROUNDWATER MNGT PERMIT APPLICATION LOT 120 S/H 2011



- LEGEND:**
- Property boundary
 - Areas Remediated in 2009
 - Surface Contour (Feet)
 - welland boundary / intermittent stream
 - Monitoring Well Location
 - Tree Line
 - Existing Building
 - = APPROX. LOTLINE



Base Map Sources:
GZA GeoEnvironmental, Inc., Exploration Location Plan and Approximate Limits of Buried Leather, November 2004

Figure 2
Site Plan-Lot 120
Former Regis Tannery
Raymond, New Hampshire
NHDES Site No. 198705081

Prepared By:
StoneHill Environmental, Inc.
Project No. 28074

properly disposed at a facility permitted to accept the material. →

The dam and northern berm removed. No other remediation of Lagoon #3.

2.6.1 Lagoon 3 Dam

Lagoon 3 was first dewatered before removing the dam. Dewatering was conducted in accordance with a Wetlands Permit issued in December 2007, a Temporary Surface Water Discharge Permit issued in October 2008 and a Dewatering and SWPP issued in December 2008. Lagoon 3 dewatering activities was completed in March 2009 over a period of four weeks.

Prior to removing the earthen Lagoon 3 Dam, four test pits were advanced into the dam to determine if leather scraps were contained in the dam and to test the soil quality for possible reuse onsite. Soil samples were collected from each test pit for total chromium and TCLP chromium analyses. As shown in Table 2 (page 4), total chromium analytical results were all well within NHDES SRS and TCLP analysis did not detect chromium. Therefore, the earthen dam was removed and reuse of the material onsite was not restricted. Some of the sand and gravel obtained from the removal of the dam was mixed with material that was being placed into the Consolidation Area to improve the stability of material. Some of the sand and gravel was used to backfill areas excavated on Lot 43 and used as cover over the deeply buried fill on Lot 43.

→ Retesting of the rest of Lagoon #3 not done.

Following the removal of the Lagoon 3 dam, five post excavation soil samples were collected from the base of the former dam for total chromium analyses. One duplicate soil sample was also collected. The chromium analytical results were all well below NHDES SRS. Analytical results are summarized in Table 4 (page 6). The area was subsequently stabilized, loamed and seeded in accordance with the SWWPP.

In addition to the Lagoon 3 Dam, sand and gravel comprising a berm along the north bank of Lagoon 3 was excavated for fill material in other areas of Lot 43 and Lot 120 during remedial activities. Prior to utilizing this material elsewhere on the Site, four samples were collected from the berm for total chromium analyses. Analytical results indicated that the chromium concentrations were consistent with background concentrations and well below NHDES SRS for total chromium. Analytical results are included in Table 2 (page 3).

Analytical results obtained from Lagoon 3 Dam and Lagoon 3-north berm sampling are included in the laboratory reports in Appendix C. Sample locations are depicted on Figure 4. Photographs 6, 19, 26, and 27 in Appendix A show the Lagoon 3 Dam prior to removal, removal of the dam, Lagoon 3 following dewatering, and current conditions of the areas comprising the former Lagoon 3 and Lagoon 3 Dam.

2.6.2 Lagoon 2 Excavation

Chromium impacted material was removed from Lagoon 2 using an excavator, bull dozer and dump trucks. The majority of impacted material was excavated into piles and then moved by bull dozer directly into the Consolidation Area. Some areas were excavated and loaded into a dump truck and then transported and unloaded into the Consolidation Area. The limits of the excavation were

What are the HAs for the four PFAS?

PFOA Interim Updated Health Advisory – Input Parameters and HA Value			
Parameter	Value	Units	Source
Chronic RfD	1.5E-9	mg/kg/day	U.S. EPA, 2021a. <i>Draft</i> RfD based on developmental immune health outcome (suppression of tetanus vaccine response in 7-year-old children). Human epidemiological studies.
DWI-BW	0.0701	L/kg-day	U.S. EPA, 2019. 90th percentile direct and indirect consumption of community water, consumers-only population, two-day average, for children ages 0 to <5 years based on 2005–2010 National Health and Nutrition Examination Survey (NHANES).
RSC	0.2	N/A	U.S. EPA, 2021a. RSC based on a review of the current scientific literature.
<i>PFOA Interim Updated Lifetime Health Advisory = 4E-09 mg/L or 0.004 ppt (EPA 2022a)</i>			

PFOS Interim Updated Health Advisory – Input Parameters and HA Value			
Parameter	Value	Units	Source
Chronic RfD	7.9E-09	mg/kg/day	U.S. EPA, 2021b. <i>Draft</i> RfD based on developmental immune health outcome (suppression of diphtheria vaccine response in 7-year-old children). Human epidemiological studies.
DWI-BW	0.0701	L/kg-day	U.S. EPA, 2019. 90th percentile direct and indirect consumption of community water, consumers-only population, two-day average, for children ages 0 to <5 years based on 2005–2010 NHANES.
RSC	0.2	N/A	U.S. EPA, 2021b. RSC based on a review of the current scientific literature.
<i>PFOS Interim Updated Lifetime Health Advisory = 2E-08 mg/L or 0.02 ppt (EPA 2022b)</i>			

GenX Chemicals Final Health Advisory – Input Parameters and HA Value			
Parameter	Value	Units	Source
Chronic RfD	3E-06	mg/kg/day	U.S. EPA, 2021c. Final RfD based on critical liver effects (constellation of liver lesions as defined by the National Toxicology Program Pathology Working Group) in parental female mice exposed to HFPO dimer acid ammonium salt by gavage for 53–64 days.
DWI-BW	0.0469	L/kg-day	U.S. EPA, 2019. 90 th percentile two-day average, consumer only estimate of combined direct and indirect community water ingestion for lactating women (13 to <50 years) based on 2005–2010 NHANES.
RSC	0.2	N/A	U.S. EPA, 2021c. Based on a review of the current scientific literature.
<i>GenX Chemicals Final Lifetime Health Advisory = 0.00001 mg/L or 10 ppt (EPA 2022c)</i>			

PFBS Final Health Advisory – Input Parameters and HA Value			
Parameter	Value	Units	Source
Chronic RfD	3E-04	mg/kg/day	U.S. EPA, 2021d: Final RfD based on critical effect of decreased serum total thyroxine (T4) in newborn (postnatal day (PND) 1) mice after gestational exposure to the mother.
DWI-BW	0.0354	L/kg-day	U.S. EPA, 2019. 90 th percentile two-day average, consumer only estimate of combined direct and indirect community water ingestion for women of childbearing age (13 to <50 years) based on 2005–2010 NHANES.
RSC	0.2	N/A	U.S. EPA, 2021d. Based on a review of the current scientific literature.
<i>PFBS Final Lifetime Health Advisory = 0.002 mg/L or 2,000 ppt (EPA 2022d)</i>			

Basically states Lot 43 needs continued monitoring but 120 cap is doing it's job - however now asking for PFAS testing prior to discontinuing . Luckily this was required or the contamination that was not remediated from Lagoon #3 may never have been discovered. Here is a case for regulations at work.

Quattrini, Samuele

From: Quattrini, Samuele
Sent: Tuesday, November 14, 2017 1:12 PM
To: 'tstone@stonehillenvironmental.com'
Cc: 'ecreveling@raymondnh.gov'
Subject: Raymond Regis Tannery - Lot 43 & Lot 120

Hi Tim,

I reviewed the latest data transmittal (June 2017) for the two sites and investigation results for Lot 43 and I have the following comments:

- • Lot 43 (DES #198705081) - As mentioned in the report, a GMP renewal application is due by January 7, 2018. Based on the results from the latest investigation and monitoring, please include the two new monitoring wells installed in July 2017 (i.e., MW-3(43) and MW-4(43)) in the monitoring locations list of the new GMP (MW-3(43) may be eventually dropped if continues to be ND). In addition, based on NHDES' letter from October 19, 2017 "Inclusion of Per- and Polyfluoroalkyl Substances (PFAS) as Contaminants of Concern at New Hampshire Waste Sites", please include in the GMP renewal application a discussion on whether the Site should be sampled (or not) for polyfluoroalkyl substances (PFAS). In your evaluation, other than the historical uses of the site, please also consider the fire that occurred in the 1970s and other potential releases of AFFF that may have occurred at the site.
- • Lot 120 (DES #201110061) – we agree that concentrations of chromium in groundwater do not warrant for further monitoring therefore an new GMP is not required for this site. Although, because of the connection with Lot 43, it is wise to wait on site closure activities (maintaining the existing AUR) once the PFAS monitoring request has been addressed for Lot 43.

Feel free to call me if you have any questions.

Regards
Sam

Sam Quattrini, P.G. | Hazardous Waste Remediation Bureau | NH Department of Environmental Services
29 Hazen Drive, Concord, NH 03302-0095 - Phone: (603) 271-2890
Please consider the environment before printing this email.

Project ID: Regis Tannery 14038

Job ID: 59437

Sample#: 59437-002

Sample ID: MW-6

Matrix: Water

Sampled: 11/18/21 15:40

Method Reference: SOP-5317r0

197.5 PPT = 49,572 x HAL

Parameter	Result	Reporting		Units	Dil'n	Analyst	Prep Date	Batch	Analysis	
		Limit	DL						Date	Time
perfluorotetradecanoic acid (PFTEA)	1.9 U	1.9	0.44	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorotridecanoic acid (PFTRIA)	1.9 U	1.9	0.98	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorododecanoic acid (PFDOA)	1.9 U	1.9	0.34	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluoroundecanoic acid (PFUNA)	1.9 U	1.9	0.22	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorodecanoic acid (PFDA)	1.9 U	1.9	0.65	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorononanoic acid (PFNA)	3.6	1.9	0.55	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorooctanoic acid (PFOA)	24	1.9	0.15	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluoroheptanoic acid (PFHPA)	2.5	1.9	0.074	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorohexanoic acid (PFHXA)	1.3 J	1.9	0.31	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluoropentanoic acid (PFPA)	1.9 U	1.9	1.2	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorobutanoic acid (PFBA)	1.2 J	1.9	0.15	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorodecane sulfonic acid (PFDS)	1.9 U	1.9	0.14	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorononanesulfonic acid (PFNS)	1.9 U	1.9	0.22	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorooctane sulfonic acid (PFOS)	150	1.9	0.20	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluoroheptane sulfonic acid (PFHPS)	2.1	1.9	0.21	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorohexane sulfonic acid (PFHXS)	5.2	1.9	0.33	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluoropentane sulfonic acid (PFPEs)	1.3 J	1.9	0.11	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorobutane sulfonic acid (PFBS)	4.4	1.9	0.33	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
8:2 fluorotelomer sulfonic acid (82FTS)	1.9 U	1.9	0.19	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
6:2 fluorotelomer sulfonic acid (62FTS)	1.9 U	1.9	0.28	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
4:2 fluorotelomer sulfonic acid (42FTS)	1.9 U	1.9	0.26	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
perfluorooctane sulfonamide (PFOSA) (FOSA)	1.9 U	1.9	0.15	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
n-methyl perfluorooctane sulfonamide (NMEFOSA)	1.9 U	1.9	0.22	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
n-ethyl perfluorooctanesulfonamido acetic acid (NETFOSAA)	1.9 U	1.9	0.62	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
n-methylperfluorooctane sulfonamido acetic acid (NMEFOSAA)	1.9 U	1.9	0.54	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propanoic acid (GenX acid) (HFPODA)	1.9 U	1.9	0.19	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
4,8-dioxa-3h-perfluorononanoic acid (ADONA acid) (ADONA)	1.9 U	1.9	0.18	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
11-chloroeicosafuoro-3-oxaundecane-1-sulfonic acid (11CLPF3OUDS)	1.9 U	1.9	0.18	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
3-chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9CLPF3ONS)	1.9 U	1.9	0.13	ng/L	1	WAS	11/30/21	14506	11/30/21	17:48
Surrogate Recovery		Limits								
13C2-PFTeA SUR	16 *	50-200	%	1	WAS	11/30/21	14506	11/30/21	17:48	

J = This compound was analyzed for, but not detected above the associated method detection limit.

I = The analytical result was below the instrument calibration range, but above the method detection limit. The reported concentration is an estimate.

Project ID: Regis Tannery 14038

Job ID: 59437

Sample#: 59437-003

Sample ID: GZ-101

Matrix: Water

Sampled: 11/18/21 14:55

Method Reference: SOP-5317r0

815.8 ppt = 203,950 xHAL

Parameter	Result	Reporting		Units	Dil'n	Factor	Analyst	Prep Date	Batch	Analysis	
		Limit	DL							Date	Time
perfluorotetradecanoic acid (PFTEA)	1.7 U	1.7	0.39	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorotridecanoic acid (PFTRIA)	1.7 U	1.7	0.85	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorododecanoic acid (PFDOA)	1.7 U	1.7	0.30	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluoroundecanoic acid (PFUNA)	1.7 U	1.7	0.19	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorodecanoic acid (PFDA)	1.7 U	1.7	0.56	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorononanoic acid (PFNA)	5.5	1.7	0.48	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorooctanoic acid (PFOA)	36	1.7	0.13	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluoroheptanoic acid (PFHPA)	4.2	1.7	0.064	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorohexanoic acid (PFHXA)	4.9	1.7	0.27	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluoropentanoic acid (PFPA)	2.4	1.7	1.0	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorobutanoic acid (PFBA)	2.2	1.7	0.13	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorodecane sulfonic acid (PFDS)	1.7 U	1.7	0.12	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorononanesulfonic acid (PFNS)	1.7 U	1.7	0.19	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorooctane sulfonic acid (PFOS)	690	8.4	0.86	ng/L	5	WAS	11/30/21	14506	12/1/21	11:20	
perfluoroheptane sulfonic acid (PFHPS)	13	1.7	0.18	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorohexane sulfonic acid (PFHXS)	39	1.7	0.29	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluoropentane sulfonic acid (PFPS)	11	1.7	0.094	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorobutane sulfonic acid (PFBS)	7.6	1.7	0.28	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
8:2 fluorotelomer sulfonic acid (82FTS)	1.7 U	1.7	0.16	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
6:2 fluorotelomer sulfonic acid (62FTS)	1.7 U	1.7	0.24	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
4:2 fluorotelomer sulfonic acid (42FTS)	1.7 U	1.7	0.23	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
perfluorooctane sulfonamide (PFOSA) (FOSA)	1.7 U	1.7	0.13	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
n-methyl perfluorooctane sulfonamide (NMEFOSA)	1.7 U	1.7	0.19	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
n-ethyl perfluorooctanesulfonamido acetic acid (NETFOSAA)	1.7 U	1.7	0.54	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
n-methylperfluorooctane sulfonamido acetic acid (NMEFOSAA)	1.7 U	1.7	0.47	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propanoic acid (GenX acid) (HFPODA)	1.7 U	1.7	0.16	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
4,8-dioxa-3h-perfluorononanoic acid (ADONA acid) (ADONA)	1.7 U	1.7	0.15	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
11-chloroeicosafuoro-3-oxaundecane-1-sulfonic acid (11CLPF3OUDS)	1.7 U	1.7	0.16	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9CLPF3ONS)	1.7 U	1.7	0.11	ng/L	1	WAS	11/30/21	14506	11/30/21	18:04	
Surrogate Recovery		Limits									
13C2-PFTeA SUR	51	50-200	%	1	WAS	11/30/21	14506	11/30/21	18:04		

U = This compound was analyzed for, but not detected above the associated method detection limit.

J = The analytical result was below the instrument calibration range, but above the method detection limit. The reported concentration is an estimate.

Table 3
Summary of Groundwater Quality Data-PFAS
 Former Regis Tannery - Lots 43 and 120
 Old Manchester Road
 Raymond, New Hampshire

Sample ID	NHDHS AGQS	Sulfonates / Sulfonic Acids (ng/l)							Sulfonamides / Fluorotelomers (ng/l)				Total PFOS + PFOA (ng/l)
		Perfluorobutane Sulfonic Acid (PFBS) 375-73-5	Perfluorohexane Sulfonic Acid (PFHXS) 355-46-4	Perfluorheptane Sulfonate (PFHPS) 375-92-8	Perfluorooctane Sulfonic Acid (PFOS) 1763-23-1	Perfluorooctane Sulfonamide (FOSA) 754-91-6	Perfluorodecane Sulfonate (PFDS) 335-77-3	N-ethylperfluorooctane Sulfonamideacetic Acid (EFOSAA) 2991-50-6	N-methylperfluorooctane Sulfonamideacetic Acid (MeFOSAA) 2355-31-9	6:2 Fluorotelomer Sulfonate 27619-97-2	8:2 Fluorotelomer Sulfonate 39108-34-4	70	
MW-4	7/24/2018	19.0	220	--	384	--	--	--	--	--	--	598	
	8/28/2018	--	--	--	--	--	--	--	--	--	--	--	
	7/5/2019	--	--	--	170	--	--	--	--	--	--	370	
	9/11/2020	7.5	130	19	370	<2	<2	<2	<2	<2	<2	530	
GZ-1 (43)	7/24/2018	9.62	47.6	--	131	--	--	--	--	--	--	160.6	
	8/28/2018	--	--	--	--	--	--	--	--	--	--	--	
	7/5/2019	--	--	--	--	--	--	--	--	--	--	--	
	9/11/2020	2.1	14	<2	90	<2	<2	<2	<2	<2	<2	107	
MW-5	7/5/2019	--	--	--	66	--	--	--	--	--	--	107	212.62 98% [Ⓢ]
MW-6	7/5/2019	--	--	--	190	--	--	--	--	--	--	230	197.5 18% [Ⓢ]
GZ-101	7/5/2019	--	--	--	250	--	--	--	--	--	--	273	815.8 99% [Ⓢ]

Notes at end of table.

NHDHS Site No. 198705081 (Lot 43)
 NHDHS Site No. 201110061 (Lot 120)

Table 3
Summary of Groundwater Quality Data-PFAS

Former Regis Tannery - Lots 43 and 120
 Old Manchester Road
 Raymond, New Hampshire

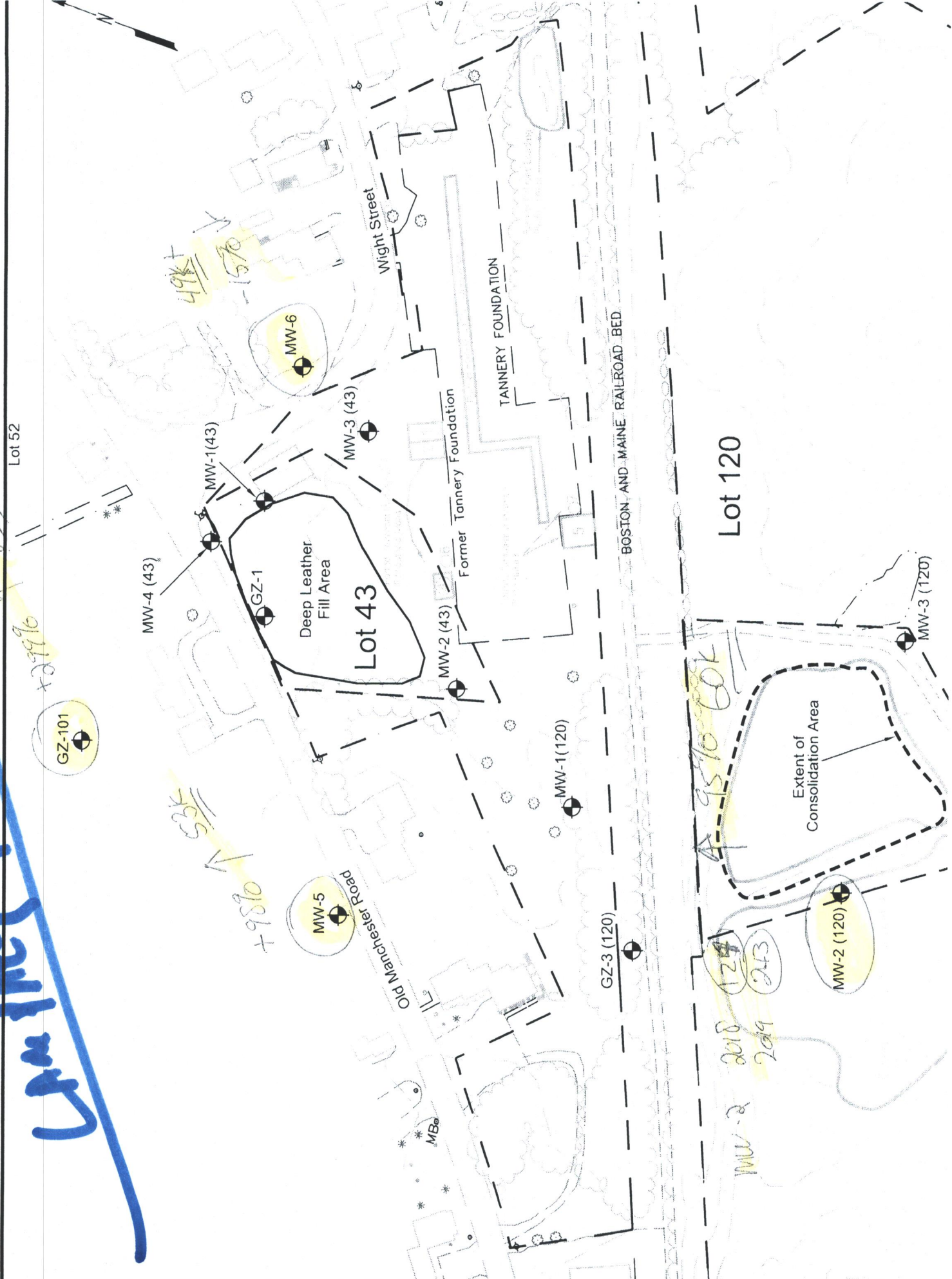
Sample ID	CAS Number	Sulfonates / Sulfonic Acids (ng/l)				Sulfonamides / Fluoroteleomers (ng/l)				Total PFOS + PFOA (ng/l)				
		Perfluorobutane Sulfonic Acid (PFBS)	Perfluorohexane Sulfonic Acid (PFHxS)	Perfluoroheptane Sulfonate (PFHpS)	Perfluorooctane Sulfonic Acid (PFOS)	Perfluorooctane Sulfonamide (FOSA)	Perfluorodecane Sulfonate (PFDS)	N-ethylperfluorooctane Sulfonamideacetic Acid (EtFOAA)	N-methylperfluorooctane Sulfonamideacetic Acid (MeFOAA)		6:2 Fluorotelomer Sulfonate	8:2 Fluorotelomer Sulfonate		
MW-1 (120)	375-73-5	NS	18	NS	15	754-91-6	NS	NS	2991-50-6	NS	NS	NS	NS	70
	7/24/2018	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/2018	2.68	17.9	--	146	--	--	--	--	--	--	--	--	184
	7/5/2019	--	--	--	280	--	--	--	--	--	--	--	--	315
MW-2 (120)	375-73-5	<2	9.6	4.0	180	<2	NS	NS	8.9	<2	<2	<2	<2	209
	7/24/2018	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/2018	5.26	24.1	--	74.5	--	--	--	--	--	--	--	--	124
	7/5/2019	--	--	--	170	--	--	--	--	--	--	--	--	243

Handwritten notes in yellow highlight:
 ↑ 95
 ppt = 60,750 x HAW

Notes at end of table.

Unmet Due

2005
+2996





Jim McLeod <jimrpb@gmail.com>

ACRES Property ID # 88861 EPA Brownfield site

11 messages

Jim McLeod <jimrpb@gmail.com>

Tue, Nov 15, 2022 at 2:25 PM

To: Gardner.Frank@epa.gov

Cc: Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>

Good Afternoon Mr. Gardner,

Maddie or Christine, please bcc the Board and copy for member Gott.

I am reaching out to you regarding a property that is coming before the Planning Board (of which I am a member so this communication will be made public) in Raymond, NH. The property in question is listed as Map 28-3, Lot 120-1 and is about 61 acres. We also have a Lot 120 that is about 10 acres. It appears the original lot 120 per your documentation online was 71.75 acres, which leads me to believe the lot was subdivided at some point.

We have regulations that impose certain requirements to be met when addressing applications " which involve property contaminated by hazardous or toxic materials" .

Because Lot 120 and 120-1 were the same property when the EPA designated it as a brownfield site-

Would both properties still be considered one as it relates to the brownfield designation ?

Was the EPA notified of the brownfield lot division?

Does the EPA approve or otherwise regulate the division of brownfields ?

Here is the Profile Page address from the website

https://cimc.epa.gov/ords/cimc/f?p=CIMC:31:::Y,31:P31_ID:88861#map

Thank you for your time, be well.

Jim McLeod
Raymond Planning Board, member

Jim McLeod <jimrpb@gmail.com>

Wed, Nov 16, 2022 at 12:33 PM

To: Gardner.Frank@epa.gov

Cc: Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>

Mr Gardner,

RE:
NHDES Site Nos. 198705081 & 201110061 (Lot 43 & Lot 120)
Project Type HAZWASTE
Project #0278 & 27227

(Maddie & Christina please bcc the board and copy member Gott , TY)

Thank you for your time on the phone today , I appreciate your help understanding the dynamics regarding the brownfield site and the controls in place around it. I came across this report from 2021 which identifies the site as a potential source for elevated Perfluorooctane Sulfonic Acid (PFOS) sampling taken from the Lamprey River surface water downstream on April 23, 2020.

If I could direct your attention to a few spots :

From Page 9 in the conclusions:

"In general, PFAS compounds were detected in groundwater samples at elevated concentrations with the combination of PFOS and PFOA consistently above the former 70 ng/l AGQS and well above the new individual MCLs. PFOA was detected at the highest concentration of 1,000 ng/l in the sample from monitoring well MW-1 (43), while the highest concentration of PFOS was detected in the sample from monitoring well MW-3 (43). Both wells are near the deep leather fill area, but also downgradient of the former tannery foundation."

From Page 36 in the Lamprey report:

"The potential source of PFOS detected in the sample LAMP-SW-2 is from PFOS impacted groundwater migrating from Lot 43 to the Lamprey River."

My concern is obvious, if we are getting elevated levels of PFOS 850ft downstream in surface water under normal conditions, what could happen if the capped areas are disturbed or the retention lagoons drained ? For the record , I am concerned about this for the safety and

well being of the town and anyone else that derives their drinking water from the aquifer and river basin and the very frightening prospect that this site is in such close proximity to the Lamprey Elementary School.

Thank you again for your time , be well.

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 **Periodic Summary Report HAZWATSE 2020.pdf**
9497K

Gardner, Frank <Gardner.Frank@epa.gov>

Wed, Nov 16, 2022 at 2:08 PM

To: "McCluskey, Mike" <michael.g.mccluskey@des.nh.gov>

Cc: Madeleine Dillonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, Jim McLeod <jimrpb@gmail.com>

Mike – I received these emails from Jim McLeod of the planning board in Raymond, NH. He is concerned that some recent construction activity at the former Rex Leather site may have disturbed an area that had previously been capped as part of the site cleanup. There are also concerns around removal of a beaver dam that may be causing more runoff to be released from lagoons on the property and PFAS concerns relating to the Lamprey River as identified in the attached report from 2020. Could you please touch base with Jim and help him determine whether the engineering controls and institutional controls are still intact and help advise him on the other concerns?

Jim – As I mentioned on the phone, the NHDES One-Stop website has some information I found for the two properties on which EPA funded cleanup activity some years ago: Lot 120 and Lot 43. Hopefully these are helpful, although I defer to Mike on this as well.

Thanks!

Frank Gardner, Brownfields and Sustainable Materials Management Branch Manager

USEPA Region 1 * Mailcode 07-3 * 5 Post Office Square, Suite 100

Boston, MA 02109-3912 * 617-918-1278 (office) * 617-655-3836 (cell)

He/Him

Region 1 Brownfields Program

Region 1 Brownfields Success Stories

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 **Periodic Summary Report HAZWATSE 2020.pdf**
9497K

Madeleine Dillonno <mdiionno@therpc.org>

Thu, Nov 17, 2022 at 9:52 AM

To: Madeleine Dillonno <mdiionno@therpc.org>

Cc: Christina McCarthy <cmccarthy@raymondnh.gov>

All, some questions below from Jim for your consideration regarding the ONYX Warehouse proposal tonight.

-Maddie

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 **Periodic Summary Report HAZWATSE 2020.pdf**
9497K

McCluskey, Mike <michael.g.mccluskey@des.nh.gov>

Thu, Nov 17, 2022 at 10:48 AM

To: Jim McLeod <jimrpb@gmail.com>

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dillonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>

Hi Mr. McLeod,

My name is Mike McCluskey. I am the Brownfields Coordinator with the NH Department of Environmental Services (NHDES). Oversight of the Regis Tannery currently falls under NHDES rather than EPA so Frank Gardner from EPA forwarded your inquiry to me.

Do you have a phone number where I can call you to start the conversations? Alternatively, you can just call me at the number below. I would be happy to provide some of the background you're seeking. Just so you know, I spoke to a Tricia a week or more ago who also identified herself as being a Planning Board member. I tried providing her with my contact info via e-mail but must have written down her e-mail address incorrectly as it bounced back to me. It's also worth noting that your current Town Manager, Ernie Creveling, was our main point of contact with the Town when the remediation work was performed so he would also be a resource for you.

I hope to hear from you soon.

Mike

MICHAEL G. McCLUSKEY, P.E.

N.H. DEPARTMENT OF ENVIRONMENTAL SERVICES

Brownfields Program

Hazardous Waste Remediation Bureau

29 Hazen Drive, PO Box 95

Concord, NH 03302-0095

Tel (603) 271-2183

Email: michael.g.mccluskey@des.nh.gov

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From: Gardner, Frank <Gardner.Frank@epa.gov>
Sent: Wednesday, November 16, 2022 2:09 PM
To: McCluskey, Mike <michael.g.mccluskey@des.nh.gov>
Cc: Madeleine Dilonno <mdilonno@therpc.org>; Christina McCarthy <cmccarthy@raymondnh.gov>; Jim McLeod <jimrpb@gmail.com>
Subject: RE: ACRES Property ID # 88861 EPA Brownfield site

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

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Jim McLeod <jimrpb@gmail.com>

Fri, Nov 18, 2022 at 11:17 AM

To: "McCluskey, Mike" <michael.g.mccluskey@des.nh.gov>

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdilonno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>

Mike,

Thank you for the reply . I just stumbled into this while researching an application and I am very concerned about the PFAS migration from the Tannery site, especially since the interim HALS are taken into account , I think it kind of elevated these reports from a "dental x-ray to Chernobyl" . I would like to ask you questions regarding the current detectable levels for testing , we recently had six ground samples and three surface water samples taken in addition to the standard PSR and while the Lamprey SW-2 sample registered 2.1 ng/l , the test could

only detect to 2ppt which is 100 times higher than the HAL (for PFOS, for PFOA I think it's 500 times higher) so we don't have an accurate assessment of our public recreation areas, some of these may be irrigated directly from the Lamprey , whether we should have additional monitoring wells outside the perimeter of the current wells (I am afraid we are "watching" the contamination pass beyond these wells and we are just recording it at this point), the rail trail passes through the middle of this site and I am wondering if we should be fencing off certain areas based on the new guidance and if we should prioritize some ground testing around the public space that transects the brownfield .


Please reach out to me when you can to discuss , and thank you again for your reply, be well.

Jim

Jim McLeod
Raymond Planning Board, member

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2 attachments

 **math correction (1).docx**
14K

 **11-21 Lab report.pdf**
2605K

Jim McLeod <jimrpb@gmail.com>

Fri, Nov 18, 2022 at 12:11 PM

To: "McCluskey, Mike" <michael.g.mccluskey@des.nh.gov>

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>

Mike,

Sorry, here is my cell # 207-756-2989, call me anytime you are available. Thank you for your time , I appreciate it very much.

Jim

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McCluskey, Mike <michael.g.mccluskey@des.nh.gov>

Fri, Nov 18, 2022 at 12:15 PM

To: Jim McLeod <jimrpb@gmail.com>

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>, "Justham, Tanya" <Tanya.P.Justham@des.nh.gov>

Jim,

Do you have time for a quick call this afternoon? While there is certainly more site investigation work that needs to be done, there is currently insufficient information at this point to make conclusive determinations regarding the risk posed by the PFAS. I would just like to start the conversation so we can provide some guidance as to next steps. Please note that there is an outstanding request for the Town to perform a Supplemental Site Investigation to evaluate the nature and extent of PDAS contamination ([Date] (state.nh.us)).

Mike

MICHAEL G. McCLUSKEY, P.E.

N.H. DEPARTMENT OF ENVIRONMENTAL SERVICES

Brownfields Program

Hazardous Waste Remediation Bureau

29 Hazen Drive, PO Box 95

Concord, NH 03302-0095

Tel (603) 271-2183

Email: michael.g.mccluskey@des.nh.gov

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From: Jim McLeod <jimrpb@gmail.com>
Sent: Friday, November 18, 2022 11:18 AM
To: McCluskey, Mike <michael.g.mccluskey@des.nh.gov>
Cc: Gardner, Frank <Gardner.Frank@epa.gov>; Madeleine Dilonno <mdiiionno@therpc.org>; Christina McCarthy <cmccarthy@raymondnh.gov>; townmanager@raymondnh.gov
Subject: Re: ACRES Property ID # 88861 EPA Brownfield site

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

[Quoted text hidden]

McCluskey, Mike <michael.g.mccluskey@des.nh.gov> Fri, Nov 18, 2022 at 2:00 PM
To: Jim McLeod <jimrpb@gmail.com>
Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdiiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>, "Justham, Tanya" <Tanya.P.Justham@des.nh.gov>

Hi Jim,

As we just discussed, here is a link to the two (2) Activity and Use Restriction (AUR) documents that were recorded in the chain of title for the 2 parcels. These documents include a metes and bounds descriptions of the specific portions of the properties subject to the restrictions and references where you should be able to find a site plan showing the respective areas at the Rockingham Registry of Deeds - IISProxy.dll (state.nh.us).

Contact me when you can with potential dates to meet on the site. In the interim, have a good weekend.

Mike

MICHAEL G. McCLUSKEY, P.E.

N.H. DEPARTMENT OF ENVIRONMENTAL SERVICES

Brownfields Program

Hazardous Waste Remediation Bureau

29 Hazen Drive, PO Box 95

Concord, NH 03302-0095

Tel (603) 271-2183

Email: michael.g.mccluskey@des.nh.gov

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Jim McLeod <jimrpb@gmail.com>
To: "McCluskey, Mike" <michael.g.mccluskey@des.nh.gov>

Wed, Nov 23, 2022 at 12:07 PM

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>, "Justham, Tanya" <Tanya.P.Justham@des.nh.gov>
 Bcc: Dennis Campbell <dcampbell@raymondnh.gov>, Dee Luszcz <DL.raymondpb@gmail.com>, macpark1@comcast.net

Mike,

Thank you for the information, it was simultaneously educational and troubling. I have been waiting to reply because the gravity of the situation demanded a more formal response. To that end the Raymond Planning Board has acted with alacrity and foresight to form a Water Planning Committee which I am now representing. The purpose of the committee is to investigate and report back to the Planning Board, in public, on all aspects of Raymonds water. The primary concern is the contamination from the original Rex Tannery site as it appears to not be retaining all the contaminants, this would not be the first instance of a failed remediation in our town, so anxiety is rapidly increasing. Having read a significant portion of the documentation available on NH ONE STOP, as well as documentation that is publically available on our town website, it is the committee's belief that some very concerning oversights may have happened and that a cosequential discharge event has occurred that could have a significant adverse effect on human health.

It is imperative that this process begin immediately and I would like to see if you are available to meet with me and interested parties from the municipality on 11/28, 29, or 30th on site in Raymond, corner of Wight and Old Manchester Road, and then gather for discussion about steps we need to take in the immediate to address the committees concerns for the health of the citizens, what we need to do in the intermediate to get paperwork filed (SSI response, etc.) ,and what we may be looking at long term depending on the results of our actions. If you can make any of those dates, please let me know and I will coordinate with Ernie Creveling our Town Manager and the listed point of contact for this site (cc'd) to find out who he thinks will be necessary to have represented.

It is clear a portion of the original tannery site has never been remediated, so while PFAS is a cumulative and concerning new development, there are heavy metals and a variety of chemicals that were detected in and around Lagoon #3 that have not been monitored for many years. Additionally, this lagoon and the down gradient run through culverts under the NH Rail Trail and Old Manchester Road ultimately discharging directly into Wetland B on the federally protected Lamprey River, bordering the most productive part of our aquifer, it is also noted be next to a residence and the Lamprey River Elementary School. If there is any possible way to immediately collect a few samples from Lagoon #3, the area between the lagoon and the rail trail, and from the discharge at wetland B, it would go a long way to allay the growing concern about possible contamination of those areas while a more comprehensive plan of action is determined. The Tannery Lagoon #3 ownership has transferred from the Town of Raymond which may complicate sampling from that area.

The wider implication is that the PFAS/contamination plume from this site could comingle with other hazard sites in and around our aquifers and contaminate the public water supply as well as the aquifer itself, causing irreparable damage to Raymond and the surrounding communities. It is understood this email is short on specifics, partly because there is such a preponderance of information and partly because the committee is working on a more concise presentation of the data. We do not feel we are overreacting to the available information, but any underreaction is going to fall under the harshest scrutiny from our citizens, so it is imperative we are thoughtful in how we proceed.

The Water Planning Committee's desire is to get this information out in a factual and unbiased way that is both informative and relatable to the citizens and your help will be essential in accomplishing that goal, so I thank you very much for your time and assistance.

Respectfully,

Jim McLeod
 Raymond Planning Board
 Water Planning Committee

Raymond Water Planning Committee Bcc'd

Kathleen McDonald, Conservation
 Dee Luszcz, Planning
 Scott Campbell, Selectman

[Quoted text hidden]

McCluskey, Mike <michael.g.mccluskey@des.nh.gov>

Wed, Nov 23, 2022 at 3:14 PM

To: Jim McLeod <jimrpb@gmail.com>

Cc: "Gardner, Frank" <Gardner.Frank@epa.gov>, Madeleine Dilonno <mdiionno@therpc.org>, Christina McCarthy <cmccarthy@raymondnh.gov>, "townmanager@raymondnh.gov" <townmanager@raymondnh.gov>, "Justham, Tanya" <Tanya.P.Justham@des.nh.gov>

Hi Jim,

I will have to get back to you next week regarding our availability. In addition, I will have to go back and revisit our files regarding the cleanup that had previously been implemented to address the tannery related wastes as it has been several years. As we discussed, PFAS was not even on our radar back then and we recognize it warrants additional site investigation.

11/23/22, 7:37 PM

Gmail - ACRES Property ID # 88861 EPA Brownfield site

You note that your email is short on specifics but some specifics would be helpful when I revisit our files as you have suggested that the cleanup to address the tannery related wastes was a failed remediation, that a discharge event has occurred, and that a portion of the tannery site was never remediated. Granted it has been a while since I was the NHDES project manager for this site but It is not clear to me what the basis of those statements is.

We look forward to helping the Town of Raymond in assessing and understanding the information that is currently available and providing some guidance as to the appropriate next steps.

[Quoted text hidden]