



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

April 6, 2021

Christopher S. Angier
Senior Environmental Project Manager
Saint-Gobain Performance Plastics
14 McCaffrey Street
Hoosick Falls, NY 12090

Subject: **Merrimack** – Saint-Gobain Performance Plastics, 701 Daniel Webster Highway
DES Site #199712055, Project #36430

Public Water Supplies in Consent Decree – Request for Work Plan

Dear Mr. Angier:

Air deposition of per- and polyfluoroalkyl substances (PFAS) discharged from the Saint-Gobain Performance Plastics (Saint-Gobain) facility located at 701 Daniel Webster Highway in Merrimack (Facility) has resulted in regional groundwater contamination. Pursuant to Env-Or 600, Saint-Gobain is responsible for investigation and remediation of groundwater contamination associated with releases from their Facility within the Outer Boundary of the Consent Decree.

NHDES requested a work plan that identifies water supply wells that exceed the Ambient Groundwater Quality Standards (AGQS) due to impacts by releases from the Saint-Gobain Facility, and to provide an alternate source of potable water that meets applicable federal and state water quality criteria where the standards are exceeded in a letter dated, July 25, 2019. In response to the NHDES request, Saint Gobain's environmental consultant, Golder Associates, Inc. (Golder) submitted the *Work Plan for Sampling of Water Supply Wells and Provision of Alternate Water*, dated September 30, 2019. Golder defined 'water supply well' in the work plan as 'residential/private wells and transient non-community public water supply wells'. This definition **excludes** wells for non-transient non-community and community public water systems. NHDES' intent of the July 25, 2019 letter was that wells serving these types of public water systems would be included in the work plan and the provision of alternate water.

As such, NHDES requests submission of a work plan (or addendum to the September 2019 Work Plan), within 30 days of the date of this letter, that:

- (i) Identifies the location, name, PWSID number, and population served for each active non-transient non-community and community public water supply well within the Consent Decree boundary. In the event that an inactive source becomes active in the future, it should be incorporated into the plan in subsequent addenda.

www.des.nh.gov

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

- (ii) Provides a summary table of prior PFAS analytical data collected by others for these wells.
- (iii) Provides a scope of work and schedule to sample these wells, analyze for PFAS, and report the findings and laboratory analytical results to the owner, with a copy to NHDES in cases where: a) the well has not yet been sampled for PFAS; b) confirmatory sampling is warranted; or c) previous samples are for combined sources and/or treated water. Some of the samples collected to-date for the public water supplies are for combined sources (e.g., two or more wells) and may not reflect PFAS concentrations of raw water from individual wells. Consider whether to sample treated/distributed water in addition to raw source water.
- (iv) Submit, for those public wells where existing sampling data indicate that the groundwater samples exceed PFAS AGQS due to impacts by discharges from the Saint-Gobain Facility, a plan and schedule to provide potable water, on a short-term and permanent basis, that meets applicable federal and state water quality criteria as required by Env-Or 600 rules. The Work Plan should incorporate a plan and schedule for sampling and analysis of proximal (private and transient) water supply wells and provision of potable water based on the scopes of work previously approved by NHDES for Addenda 1 through 7. Any new AGQS exceedance (based on data provided by others or data generated in accordance with item iii, above) should be incorporated into the work plan within 15 days and listed in subsequent addenda.
- (v) For those wells where sampling data indicate that groundwater concentrations exceeds AGQS for PFAS, but Saint-Gobain concludes that the impacts are not due to a release from Saint-Gobain's Facility, then the Work Plan (or subsequent addenda) should identify Saint-Gobain's rationale for the conclusions, supported by data and other documentation, on a case-by-case basis. Pending NHDES' review of the rationale provided, a site investigation consistent with Env-Or 600 (and the interim provision of potable water) may still be required for Saint-Gobain to determine the full extent of contamination resulting from Saint-Gobain's discharge and to identify receptors in the subject area(s).

Should you have questions regarding this letter, please contact me at NHDES' Waste Management Division.

Sincerely,



Jeffrey M. Marts, P.G.
Senior Hydrogeologist
Hazardous Waste Remediation Bureau
Tel: (603) 271-6573
Email: Jeffrey.M.Marts@des.nh.gov

ec: Ross W. Bennett, P.E., Golder Associates
Michael J. Wimsatt, P.G., Director, NHDES/WMD
Karlee Kenison, P.G., Administrator, NHDES/HWRB
Kate Emma A. Schlosser, P.E., NHDES/HWRB
Brandon Kernen, P.G., Administrator, NHDES/DWGB
Stephen Roy, P.G., NHDES/DWGB
Amy Rousseau, PFAS Response Administrator, NHDES/MtBE
Eileen Cabanel, Town Manager, Town of Merrimack
Attention Health Officer, Town of Merrimack
Rick Sawyer, Town Manager, Town of Bedford
Attention Health Officer, Town of Bedford
Troy Brown, Town Administrator, Town of Litchfield
Attention Health Officer, Town of Litchfield
Kevin Smith, Town Manager, Town of Londonderry
Attention Health Officer, Town of Londonderry
Steve Malizia, Town Administrator, Town of Hudson
Attention Health Officer, Town of Hudson
Attention Health Officer, City of Manchester
Ron Miner, Superintendent, Merrimack Village District
Donald Ware, P.E., Chief Operating Officer, Pennichuck Corporation