



Town of Londonderry, New Hampshire

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Via Regulations.gov

U.S. Environmental Protection Agency, Region 1

5 Post Office Square, Suite 100

Boston, MA 02109-3912

Comments of the Town of Londonderry on the Environmental Protection Agency's (EPA) Proposed Plan for an Interim Remedy, Tinkham Garage Superfund Site, Londonderry, New Hampshire

Docket ID: EPA-R01-SFUND-2025-0117

The Town of Londonderry appreciates the opportunity to comment on the EPA's Proposed Plan for an interim remedy at the Tinkham Garage Superfund Site. The Town supports the prompt elimination of ingestion exposure through connection of affected and at-risk properties to a public water supply while the comprehensive groundwater remedy proceeds. We request the following clarifications and commitments be documented in the final decision document and addressed during design.

1) Water main design must explicitly include fire protection capability

Design and construction should size and configure the distribution system for municipal fire protection in addition to domestic service. At a minimum, the plans should:

- Use main diameters, looping, and isolation valving sufficient for fire flows as verified by the Londonderry Fire Department and consistent with the water utility's standards.
- Include hydrants at appropriate spacing and critical intersections, with Fire Department review.
- Document ownership, operation, costs, and maintenance responsibilities for hydrants and appurtenances.

2) Construction dewatering: permits, treatment, monitoring, and discharge

Given the presence of site contaminants in groundwater, any dewatering during trenching or ledge excavation must be managed under appropriate permits with treatment prior to discharge, if necessary. The Remedial Design should include a dewatering plan that:

- Identifies likely dewatering points, anticipated flows, and discharge locations (surface water or infiltration).
- If necessary, specifies treatment trains suitable for volatile organic compounds, 1,4-dioxane, and Per- and Polyfluoroalkyl Substances (PFAS), with pre-discharge verification sampling.

- Complies with applicable federal and state permits and monitoring, including effluent limits, reporting, and contingencies if contamination is detected in field screening.

3) Air monitoring and off-hours mitigation for airborne contaminants

EPA's presentation notes potential inhalation exposure during construction. The Town requests a **Community Air Monitoring Plan (CAMP)** for all intrusive work, with real-time perimeter monitoring of volatile organic compounds (VOCs), action thresholds, and work-pause protocols. As a practical template, widely used CAMPs employ 15-minute running averages with actions at 5 ppm above background for total VOCs, with immediate dust suppression and, if necessary, work stoppage. Off-hours controls should include covering stockpiles, securing volatile-prone spoils, maintaining negative-pressure or carbon controls where applicable, and remote telemetry with on-call response.

4) Floodplain determination and Beaver Brook protection

The Proposed Plan indicates that most of the site and groundwater impact areas are outside the Federal Emergency Management Agency (FEMA) 100- and 500-year floodplains. The Town requests the EPA provide the underlying analysis for this conclusion, including Geographic Information System (GIS) overlays of the Groundwater Management Zone and impact plumes on the effective FEMA National Flood Hazard Layer (NFHL) and any available state viewers, and to confirm whether pending Risk Mapping, Assessment, and Planning (Risk MAP) updates could alter that determination.

Hydrologically, the EPA's Proposed Plan notes site surface waters and drainages connect to Beaver Brook and extensive wetlands. Historical fact sheets report no detectable VOCs in Beaver Brook during past sampling, though low-level contamination was found in a tributary. We ask that the interim action's Stormwater Pollution Prevention Plan (SWPPP) and Erosion & Sediment (E&S) controls be tailored to protect Beaver Brook and its associated wetlands during construction and that the EPA summarize any recent surface water data collected downstream and east of Beaver Brook.

5) Groundwater east of Beaver Brook and long-term monitoring

The EPA's site documents show that bedrock groundwater influence extends northeast from the source areas and that off-property residences east of the historical field area have previously required connection to public water. The Town requests that the monitoring network in future actions include sentinel wells east of Beaver Brook to ensure that any continued migration is detected early and that the five-year review explicitly evaluates those data.

6) Juniper Ridge (Gilcrest Road) and future receptors

A 96-unit residential development is approved/underway at 35 Gilcrest Road (Juniper Ridge), within the general corridor cited in EPA's public meeting materials. While this development has undergone unrelated soil mitigation efforts and will be connected to public water from its initial occupancy, the interim action should stipulate any possible immediate or future impacts to this area.


7) Implementation details that will matter locally

To reduce disruption and avoid rework, please address the following:

- **Service transition and well abandonment:** define and fund disconnection and well-abandonment procedures, including any irrigation-well exceptions.
- **Restoration:** commit to pavement, sidewalk, and lawn restoration to Town standards; coordinate traffic control and any night work with the Department of Public Works, Police Department, and Fire Department.
- **Customer costs:** provide a plain-language cost sheet for affected residents and a point of contact for service issues during cutover and future costs.

Connecting affected and at-risk homes to public water is the right interim step. The items above are practical measures that will make the project protective, build public trust, and secure residents of the area the clean drinking water they deserve. Please include this letter in the Administrative Record and the Responsiveness Summary for the docket listed above.

Respectfully submitted,

Signed by:

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Shaun Mulholland
Town Manager, Town of Londonderry

cc: New Hampshire Department of Environmental Services; Pennichuck Water Works;
Londonderry Fire Department