



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

April 20, 2020

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

2019 Annual Groundwater Monitoring Summary, Saint-Gobain Performance Plastics, 701 Daniel Webster Highway Merrimack, prepared by Golder Associates, Inc., dated March 18, 2020

Dear Mr. Angier:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the above-referenced submittal prepared on behalf of Saint-Gobain Performance Plastics (Saint-Gobain) by Golder Associates, Inc. (Golder) for Saint-Gobain's facility located at 701 Daniel Webster Highway in Merrimack (facility). The annual summary report was submitted as part of the ongoing investigation into the release of per- and polyfluoroalkyl substances (PFAS) at the facility. The report includes results of three 2019 groundwater sampling events conducted in March, July, and October, as well as dry-weather flow observations in the stormwater conveyance system located at the facility. Over 40 monitoring wells, located at or near the facility, were sampled in 2019. Recommendations for groundwater monitoring activities for 2020 were included in the report.

Based on our review of the referenced report, NHDES provides the following comments and requests:

1. Results of the 2019 groundwater sampling events and dry-weather flow observations should be evaluated and the findings incorporated into the Supplemental Site Investigation Report.
2. NHDES concurs with the proposed 2020 groundwater monitoring program outlined in Appendix D subject to inclusion of the request for semi-annual sampling of the following monitoring wells:
 - a. MW-3S – This well appears to have a long-term increasing trend for perfluorooctanoic acid (PFOA) with significant changes in concentration that may reflect seasonal changes.
 - b. MW-03 – This well appears to have a long-term increasing trend for PFOA.
 - c. MW-04 – This well has a long-term decreasing PFOA trend; however, the shallow overburden well MW-04S has significant order-of-magnitude variation in PFOA concentrations beginning in March 2019. NHDES requests biannual sampling of MW-04 to evaluate if/when downward migration of PFAS from the shallow overburden occurs at this well triplet.

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- d. MW-06S and MW-06 – These monitoring wells are located in an area downgradient from the facility where the concentration of PFOA in the overburden is generally over 1,000 ng/L, and PFOA concentrations vary significantly. Since discharge of PFAS-contaminated groundwater contributes to increasing concentrations of PFAS in surface water along the reach of Dumpling Brook between Daniel Webster Highway and the Merrimack River, NHDES considers this well couplet location an important monitoring point to develop a long-term seasonal data set to evaluate PFAS trends downgradient from the facility.
- e. GZ-1, GZ-2, and GZ-3 – These three monitoring wells have been sampled three to six times and PFOA concentrations have varied by thousands of parts per trillion. They are located in an area where groundwater flow directions diverge and/or may change seasonally.

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

Sincerely,



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