

The year 2015 is the second Five year Review by the U.S. EPA and the N.H. Department of Environmental Services of the Troy Mills Superfund Site.

Here is the information provided for that review by two members of Troy's Conservation Commission, Sheila Ames and Marianne Salcetti to questions asked by the EPA.

1. What is your overall impression of the project and Site over the last 5 years?

The superfund site has been a concern since its inception. It was and remains a complex clean-up and monitoring challenge, given the amount of contaminants found at the site and the flammability of the liquid waste, thousands of buried drums full of flammable liquid waste left at the site that were leaking into the soil and groundwater

2. What is your opinion of the Site remedy?

The monitored natural attenuation process appears adequate at this time. The wetlands area needs to be re-examined in terms of long-term effects on the environment concerning manganese. Will this area be contaminated forever? Or, could the leachate-wetlands soil be removed?

3. Do you have any concerns with the Site or Site remedy?

A. It is our understanding interceptor trenches have a certain time span of usefulness. The trenches were no longer working or capturing liquid, therefore they were decommissioned.

B. Given the contaminated groundwater plume is still expanding and moving towards Rockwood Brook, the plume of contaminated groundwater is a concern since the plume containing Alkylbenzenes, chlorinated solvents, phthalates, and toluene.

We continue to urge regular testing for public safety issues of surface water and sediment in Rockwood Brook and Sand Dam Pond. The expansion of monitoring wells is good to figure out the size and spread of the plume. It is good to have clarified that some monitoring

wells have been replaced, along with five new, better located wells of varying depths established for monitoring. It is our understanding the five new wells are targeting layers currently not addressed by existing wells. We urge continued monitoring and that perhaps once a year is not sufficient, given New Hampshire weather variation.

C. There is a large area, one acre or so in size, of orange colored iron flock (contaminants) in the wetlands area of the site. There is water running over the top of this, which runs directly into Rockwood Brook, which then flows into Sand Dam Troy, which is a public swimming and boating area. There is a public safety concern for Sand Dam Pond. Is the water tested for contaminants from the Troy Mills Superfund Site? We continue to urge regular testing for public safety issues of the Sand Dam and Rockwood Brook.

D. There is a broken culvert off the north end of the site that leads to a sand pit. On April 19, 2015, off-road vehicles were personally observed crossing Rockwood Brook (which causes sedimentation) and going around the broken culvert. This is a popular area—using the gravel access road to the sand pit to then engage in off-road zooming around.

The repair-replacement of the broken culvert is important to maintain the ecological integrity of Rockwood Brook. Signage is needed at the wetlands site to warn trespassers of its chemical dangers. Further studies are needed to create a space for off-road vehicles, while restricting access to critical areas.

We urge continued discussion between the EPA and Troy officials of specific ways to reduce trespassing and vandalism. It might be useful to see what other areas have done around Superfund sites to reduce trespassing.

E. It is our understanding that in this five-year review the EPA examines abutting land parcels and land use restrictions surrounding the site. We remain concerned about the 8 acre solid waste landfill, which is adjacent to the site. Located there are buried waste fabric scraps that could, potentially, burn and emit toxic gases if there was an explosion or fire from the nearby pipeline creating an extremely hazardous environment for firefighters and nearby residents.

F. Chlorinated solvents remain a concern because they sink to the bottom of the groundwater table, which results in a complex dispersal and plume pattern. What is the remediation plan for this contaminant?

Five wells were installed to monitor contaminants in the bottom, middle and top of the water table.

G. It is our understanding that the EPA told us they are not going to remove leachate, but wait for the chemicals to degrade naturally. The contaminants manganese and bis(2-ethylhexyl)phthalates found in leachate remain a concern.

H. In particular, addressing long-term ramifications of manganese in the leachate-wetlands area remains a major concern since manganese does not break down in the environment.

Also, Rockwood Brook should always be tested for contaminants downstream of the site to make sure no contaminants enter Sand Dam Pond, which is a public swimming and recreation area.

4. Was your previous impression different? Why is it different?

After reading the different EPA and GZA reports, there are more issues of concern. Visiting the site also yielded more issues of concern.

5. Are you aware of any issues the 5-year review should focus on?

The expansion of the monitoring wells is good to see, more testing is encouraged. Five new wells have been installed and additional expansion should be addressed until the plume has stabilized.

The broken culvert remains of concern, along with the overall ecological integrity of Rockwood Brook and sedimentation issues.

Testing of Rockwood Brook's surface water and sediment for contaminants on the site needs to continue.

Given the flow potential of contaminants ultimately to Sand Dam, the water area there should be tested more often than once a year.

6. Who should we speak to in the community to solicit local input?

Jim Dicey—Highway /Road manager and was close to the Superfund remediation project
Already talking to Tom Matson, Selectman
Mark Huntoon Troy Fire Chief
Dave Ellis , Troy Police Chief

7. Is the town actively involved with any Site activity or should it be?

Troy CC members have been reviewing the history and remedies of the site, given its less than 500-foot location from the proposed Kinder Morgan-Northeast District natural gas pipeline proposal.

8. Have there been any changes in the Site or surrounding area in the last five years?

Interceptor trenches removed/decommissioned.
Unclear on orange colored iron flock or beaver dam developments over the last five years.

Five years ago, the plume expansion would have and remains a concern.

Increase in off-the-road vehicle traffic, lack of access needs to be established.

9. Are there any land-use or zoning changes at the Site or surrounding area?

Current easements and covenants appear to be in place.
Institutional Controls have been placed on the Site (DES).

10. Are any changes planned in the surrounding area?

The proposed Kinder Morgan Northeast District natural gas pipeline within 500-feet of the superfund site remains a paramount concern and worry for several reasons.

- A. A pipeline explosion, leak or rupture could wreak devastating consequences on the site.
- B. The adjacent landfill to the site with its flammable contents presents another catastrophic scenario.
- C. The fact Kinder Morgan itself identifies an incineration zone as one being 1,000 feet from an incident point puts the Superfund site and utility corridor at ground zero in the event of a pipeline explosion.
- D. Also, explosion of a 36-inch diameter pipe under high pressure, such as the one being proposed by Kinder Morgan could cause radiant heat to ignite secondary fires within and beyond a 1,000-foot radius.
- E. Given the chain of locations – the pipeline – the Superfund site and the Landfill that contains volatile items, the potential for catastrophe is there.
- F. Impact of such an event on covenants and easements and possible financial repercussions on the town of Troy are of utmost concern.
- G. With NHDES having a permanent easement and institutional controls on the site, the responsibility for addressing the site in the event of a pipeline event presents multiple concerns.
- H. Current Kinder Morgan plans include establishing compressor stations in Northfield, Mass. and New Ipswich, N.H. Troy is approximately halfway between these sites and the likelihood of blowdowns, metering stations, shut-down valves and “pigging”, all, or a portion, being located on Troy’s pipeline route and within 500-feet of the Superfund Site stations is quite likely. Numerous of these activities vent natural gas directly into the air as a means of reducing

pressure (a process referred to as “blow down”). This not only allows methane to escape into the atmosphere, but also the chemicals left over from the drilling or fracking process of the natural gas. These carcinogens and other toxins have been found in air sample tests near compressors and other “blow-down” facilities.

The possible interfacing of these various chemicals with contaminants such as toluene, phthalates and alkylbenzenes in the site are of concern, along with carbon dioxide, methane/ethane/ethane as well.

11. Have any developers shown interest in the Site?

Not that we know of.

12. What effects have site operations had on the surrounding community?

Currently, there is just anecdotal data that suggests residents are pleased with the clean-up, but generally uninformed and therefore, unaware of health or environmental issues or concerns.

13. Are you aware of any community concerns regarding the site or its operation and administration? If so, please give details.

A. Troy is an extremely economically depressed area with a high foreclosure rate, low incomes, etc. Of utmost concern is that something would happen to the Site that town residents would be financially responsible for. This is perception, not necessarily fact.

B. Given Kinder Morgan’s proposed natural gas pipeline will come within 500-feet of the Site, the Superfund site has been specified as a town concern in:

- Unanimous passage of six pipeline opposition warrant articles at Town meeting, including one for the Superfund site.
- Unanimous votes by the Troy Board of Selectmen and the Troy Conservation Commission to approve a nine-point resolution

against the pipeline, which includes lengthy mention of the Site as a concern.

We would be happy to provide copies of any of the above-mentioned documents.

14. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please give details.

Regarding vandalism and emergency responses, you would need to contact Dave Ellis, Troy Police Chief, Mark Huntoon, Troy Fire Chief and Jim Dicey from the Highway Department.

On April 19, 2015, it was observed one four wheeler, one three-wheeler and two mini bikes trespassing on the site. We can only infer the level of traffic during prime spring, summer and fall outdoor recreation times.

15. Do you feel well informed about the site's activities and progress?

A. Not particularly. The documents are difficult to read and interpret – it should not have been located in a small footnote that the groundwater plume is of concern, site problems being encountered etc.

B. Residents should be able to receive timely info in a clear and concise summary to receive info—a summary made available.

16. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

A. Installation of a Beaver box would lessen the potential by maintaining a lower water level.

B. Repairing the culvert or adding a bridge would allow access to the adjacent sand pit and eliminate traffic crossing into Rockwood Brook directly and improve the local community's relationship with the site.

C. The issue of Trespassing could be eliminated by allowing off-road vehicle use in certain areas only.

D. We encourage inclusion of GZA's testing results in the fall be in the Five-Year Review.

E. From what has been indicated by the EPA. Monitoring will continue as long as there are items to monitor that present issues. That is good news. Contaminants in the groundwater, leachate, along with elevated Manganese levels remain a public health and safety concern.

F. Given the likelihood Kinder Morgan's Northeast District pipeline request will be approved by the Federal Energy Regulatory Commission (FERC), we need leadership and information from the EPA regarding:

1. EPA protocols for assessing the environmental impact of a natural gas pipeline within 500-feet of a Superfund site.
2. EPA's role and place in notification and reporting systems regarding a natural gas pipeline, leak, rupture or explosion.
3. EPA's concerns or issues regarding natural gas pipeline construction near a Superfund site and specifically, the Troy Mills Superfund Site.

While we understand that items 1-3 above are better addressed through NEPA—which we will do—we strongly urge communication and co-ordination of information regarding the impact of the proposed NED pipeline's proximity to the Superfund site. Also, we remain concerned about the possible impact of pipeline blasting and construction near the site, along with impact of Rockwood Brook.

G. According to the June 16, 2004 Public Health Assessment conducted by the NH Bureau of Environmental and Occupational Health, p. 4: "Area residents are only likely to have been exposed to chemical contamination associated with the TML if they came into contact with contaminated surface water and sediments in the

wetlands area immediately adjacent to the site.” What would be the current exposure possibilities? Signage of the wetland areas is a good idea.

H. . According to the Nov. 17, 2004 Public Health Assessment conducted on the Troy Mills Landfill by the Agency for Toxic Substances and Disease Registry, p. 11: potential air exposure pathways exist from the landfill wastes being transported into soil vapors and ambient air. Concerns regarding the proposed natural gas pipeline’s proximity to the Site prompts concerns about the dangers if these items are mixed with a possible pipeline leak, rupture, explosion , blow downs or valve releases. Specific information regarding these possible scenarios is requested.

I. Appendix B of that same report identifies various contaminants of EPA concern and to us: Trichloroethene, Methyl ethyl ketone, Cresol (benzyl alcohol) Butylbenzyl phthalate, Di (2-thylhexyl) phthalate, Cadmium, Chromium, Manganese, Bis(2-ethylhexyl) phthalate, Di-n-octyl phthalate. We would like to know the 2015 recorded levels on these items and have those results be included in the Second Five Year Review.

We support the idea of fact sheets to distribute publically that would include a chemical chart showing how chemicals have declined at the site over the last 10 years.

Thank you for your help in clarifying various aspects for this final comment paper.

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