

From: [Nelson, Kurt I](#)
To: [Comstock, Gregg](#)
Cc: [Sandin, Peter](#); [Adams, Collis](#); [Price, David](#); [deborah.zartagier \(gza.com\)](#); [Champy, Dena M](#); [Sabulis, Michael](#); [sallen@normandeau.com](#); [Bebis, Dean S](#); [Franz, Hayley](#); [matthew.deane \(gza.com\)](#)
Subject: RE: NHDES Comments re 20190618 Updated SRP Soil & GW Management Plan
Date: Friday, July 12, 2019 7:33:00 PM

Thank you Gregg and Peter and David for your timely review.

Eversource agrees with the following:

1. Prior to conducting excavation work on the Frink Farm that may involve discharge of groundwater associated with excavation dewatering activities to Knights Brook, please provide a copy of the EPA authorization for the NPDES Remediation General Permit.
2. Prior to discharging any groundwater associated with dewatering activities on the east side of Little Bay at Gundalow Landing in accordance with the EPA NPDES Dewatering General Permit authorization issued by EPA, please consult with the Wetlands Bureau (David Price) regarding the location and configuration of the dewatering discharge pipe in Little Bay to confirm that no additional wetland permitting is required. If additional wetlands permitting is required it must be obtained before this discharge may occur and a copy of the permit should be provided in the Plan.

From: Comstock, Gregg <Gregg.Comstock@des.nh.gov>
Sent: Friday, July 12, 2019 7:14 PM
To: Nelson, Kurt I <kurt.nelson@eversource.com>
Cc: Sandin, Peter <Peter.Sandin@des.nh.gov>; Adams, Collis <Collis.Adams@des.nh.gov>; Price, David <David.Price@des.nh.gov>; deborah.zartagier (gza.com) <deborah.zartagier@gza.com>; Champy, Dena M <dena.champy@eversource.com>; Sabulis, Michael <msabulis@geiconsultants.com>; sallen@normandeau.com; Bebis, Dean S <dean.bebis@eversource.com>; Franz, Hayley <Hayley.Franz@des.nh.gov>; matthew.deane (gza.com) <matthew.deane@gza.com>
Subject: RE: NHDES Comments re 20190618 Updated SRP Soil & GW Management Plan

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Kurt:

Thank you for the response to our comments on the SRP Soil and Groundwater Management Plan (Plan) and for the revised version of the Plan (also received today).

According to Peter Sandin on 7/12/19, "...based on our July 10 meeting discussions and Eversource's responses below which are stated to have been incorporated into their plan, WMD-DoD considers our comments resolved and has no additional comments."

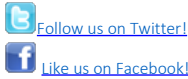
My only two comments are the following:

1. Prior to conducting excavation work on the Frink Farm that may involve discharge of groundwater associated with excavation dewatering activities to Knights Brook, please provide a copy of the EPA authorization for the NPDES Remediation General Permit.
2. Prior to discharging any groundwater associated with dewatering activities on the east side of Little Bay at Gundalow Landing in accordance with the EPA NPDES Dewatering General Permit authorization issued by EPA, please consult with the Wetlands Bureau (David Price) regarding the location and configuration of the dewatering discharge pipe in Little Bay to confirm that no additional wetland permitting is required. If additional wetlands permitting is required it must be obtained before this discharge may occur and a copy of the permit should be provided in the Plan.

Should you have any questions, please do not hesitate to contact me.

Regards,
Gregg

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From: Nelson, Kurt I <kurt.nelson@eversource.com>
Sent: Friday, July 12, 2019 11:14 AM
To: Comstock, Gregg <Gregg.Comstock@des.nh.gov>
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Subject: RE: NHDES Comments re 20190618 Updated SRP Soil & GW Management Plan

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Hi Gregg and Peter,

Thank you for your review of the SRP Soil & Groundwater Management Plan and the comments provided below. As discussed at our July 10, 2019 review meeting I have revised the plan based on the comments provided. I will be sending you a file link to the Soil and Groundwater Management Plan revised 7/12/19 as well as the NPDES Dewatering and Remediation applications and permits which I will send as stand alone documents. I've provided responses to your comments below and document references to assist in your review.

Please let me know if you have any further questions or comments on the information provided.

Regards,

Kurt I. Nelson
Sr. Land Use Licensing & Permitting Specialist



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Cc: Sandin, Peter <Peter.Sandin@des.nh.gov>; Adams, Collis <Collis.Adams@des.nh.gov>; Price, David <David.Price@des.nh.gov>; deborah.zartagier (gza.com) <deborah.zartagier@gza.com>; Champy, Dena M <dena.champy@eversource.com>; Sabulis, Michael <msabulis@geiconsultants.com>; sallen@normandeau.com; Bebis, Dean S <dean.bebis@eversource.com>; Franz, Hayley <Hayley.Franz@des.nh.gov>
Subject: NHDES Comments re 20190618 Updated SRP Soil & GW Management Plan

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Hi Kurt:

We have reviewed the updated Soil & Groundwater Management Plan (Plan) submitted on June 18, 2019 (and dated June 12, 2019). The Plan was prepared pursuant to NHDES Wetlands Permit Condition 38 in the New Hampshire Site Evaluation Committee (SEC) Order and Certificate of Site and Facility Conditions issued on January 31, 2019 (SEC Docket No. 2015-04). Our comments are provided below. Please provide a response to each comment and indicate in the plan where each comment has been addressed.

Comments from Peter Sandin of the NHDES Waste Management Division - Department of Defense Sites Section (WMD-DoD)

(Peter's program applies to the section of the project that is on the former Pease Air Force Base (now owned by PDA) as well as to other sections in Newington that may have PFAS-impacted groundwater but are not on PDA property. These may be better inferred by Eversource using updated investigation results from the Air Force. Without that most up-to-date information it is unclear where PFAS-impacted groundwater quality may be encountered because a GMZ has not yet been established.)

I've reviewed updated sections of the SRP Soil and Groundwater Management Plan and Kurt's email below and have the following reiterated/updated comments from NHDES Waste Management Division – Department of Defense Sites Section (WMD-DoD), that apply to those areas on Pease or inferred to be within current or anticipated Air Force-related Groundwater Management Zones (GMZs):

1. Groundwater

- a. If extracted water is shipped for off-site disposal it should be at an appropriate facility licensed to receive water with the known or suspected contaminants. Please confirm in the Plan that this will be done.

Treatment/disposal facility licensing does not typically call out each contaminant they can accept, but rather limits contaminants based on the facilities treatment process. Water will be transported to a treatment facility that is not restricted from accepting the water by terms of its license. PFC sampling is being conducted for all groundwater recovered and provided to treatment/disposal facilities.

SEE SGMP PG 7, SECTION 6, 2nd Bullet (pg 10 of PDF)

- **Off-Site Disposal:** The contractor shall identify an appropriate off-site groundwater disposal method and licensed receiving facility(s). In addition to sampling requirements required by receiving facilities, all groundwater shall be sampled for PFCs and this data shall be provided to the receiving facility. Dewatering effluent may be pumped into a tanker truck or other appropriate containers and transported off-site to the selected facility. All receiving facilities must be pre-approved by Eversource. No excess effluent may be recharged or disposed of at an uncontrolled location.

- b. WMD-DoD defers to other appropriate Bureaus or Agencies with respect to any proposed surface water discharges. I understand from speaking recently with Jared Sheehan that PDA will not authorize any surface water discharges on its property as part of this work.

Correct. No surface water discharges are proposed on PDA property.

- c. Any excavation dewatering that is proposed for discharge to the ground would need a Temporary Discharge Permit from NHDES' Drinking Water and Groundwater Bureau. We understand that Eversource does not propose to discharge any excavation dewatering to the ground and therefore does not intend to apply for a Temporary Discharge Permit. Please confirm in the Plan that this will be done.

Correct. Eversource will not be discharging dewatering effluent to the ground.

- d. The conceptual model for the excavation work, especially on the Frink Farm, is predicated that the excavation will only be within the clay. In the event that an underlying more transmissive hydrologic unit be exposed that generates more groundwater than anticipated (here or elsewhere along the project corridor), the plan should include appropriate contingencies for short and long-term mitigation off that scenario.

Eversource has addressed this comment.

SEE SGMP, APPENDIX C-2, Pg 3, Last Bullet (pg 260 of PDF) as shown below

- Eversource has conducted geotechnical borings throughout the project area. Soil conditions throughout the Newington area typically consist of silts and clay with low transmissivity of groundwater in upper soil strata. Artesian conditions were not encountered at any boring location. In the event, however, that significantly higher than anticipated groundwater flow rates are observed resulting in artesian conditions, where groundwater maybe discharged to the ground surface, Eversource will immediately stop excavation activities, notify and consult NHDES, and implement appropriate mitigation measures. Containment measures such as backfilling or grouting the excavation and/or installing casing may be implemented. Eversource will consult with NHDES to ensure that measures to sufficiently increase dewatering capacity are implemented prior to recommencing with the excavation if an event of this nature were to occur.

2. Soil

- a. Soil designated for off-site disposal should be at an appropriate facility licensed to receive soils with the known or suspected contaminants and handled in accordance with WMD rules. Please confirm in the Plan that this will be done.

Confirmed.

See SGMP Pg 6 2nd to last paragraph (pg 9 of PDF) as shown below

Excess soils shall be stockpiled at one or more designated materials management areas to be approved by Eversource as discussed in Section 5.1. The PE or PG will sample and test soil based on the acceptance criteria of the approved and licensed receiving facility. All soils will be sampled for PFCs.

- b. Reuse of soils not impacted above regulatory standards on-site should be in a manner consistent with the procedures outlined. Please confirm in the Plan that this will be done.

[See SGMP Pg 6 Section 5.2.1 \(pg 9 of PDF\) as shown below](#)

5.2.1 On-Site Reuse

Excavated material from above the observed groundwater interface should be backfilled within excavations to the extent feasible if the visual/olfactory, chemical, or geotechnical properties of the excavated soil are suitable for reuse.

As soil is excavated, the contractor's Professional Engineer (PE) or Professional Geologist (PG) shall observe and field screen the material for visual or olfactory indications of contamination. If visual or olfactory evidence of contamination is observed, soil will be screened for the presence of VOCs with a photoionization detector (PID) using the jar-headspace method. A minimum of one sample should be screened for visual or olfactory evidence of contamination per foundation element or open length of trench. Soils shall be screened more frequently if visual or olfactory indications of contamination are observed. Soil shall be segregated, if necessary, based on results of field screening and stockpiled for disposal characterization and off-site disposal.

Soil excavated from the saturated zone along the project alignment between Gundalow Landing and the Portsmouth Substation may only be reused as backfill in the saturated zone. Any uncharacterized excess soil from the saturated zone will be stockpiled and characterized for off-site disposal.

- c. Appendix C-4 for the updated Frink Farm Soil and Groundwater Management Plan references Figure 2. It is unclear if the Figure 2 in question is the same Figure 2 in which a discrepancy was noted in WMD-DoD August 9, 2017 comments in the station locations relative to those in cross-section Figure 3A. If that discrepancy has not been reconciled it is unclear exactly what area is being referenced by Station 497+00 to 500+25. Please advise and revise the Plan accordingly.

[This discrepancy was corrected during previous updates to the Soil and Groundwater Management Plan.](#)

[SEE SGMP APPENDIX A – \(pg 32 and 33 of the PDF\)](#)

3. Other

- a. In addition to the approvals being sought from landowners noted (e.g. Frink, PDA), WMD-DoD assumes Eversource will seek approval from all landowners, as warranted, for the proposed work and soil and groundwater management being conducted on their respective properties. Please confirm in the Plan that this will be done.

[Confirmed. Eversource has conducted extensive outreach for this project and will provide any landowner, who requests, the opportunity to discuss the soil and groundwater management activities on their property.](#)

- b. Lastly, I'm sure Eversource and their consultants are aware of the proposed lower MCL/AGQSs announced last week and should amend their plans accordingly. Please confirm in the Plan that this will be done.

[The newly proposed MCL/AGQS will be referenced in the plan](#)

[SEE SGMP Pg 3, Section 2.2, \(pg 6 of PDF\)](#)

NHDES filed a final rulemaking proposal to the New Hampshire Joint Legislative Committee on Administrative Rules (JLCAR) on June 28, 2019 to establish Maximum Contaminant Level

(MCLs)/drinking water standards and AGQS for four per- and polyfluoroalkyl substances, PFOA, PFOS, perfluorooctanoic acid (PFNA) and perfluorohexanesulfonic acid (PFHxS) on June 28, 2019. If approved by JLCAR the new rules are scheduled to become effective on October 1, 2019. The final proposed MCL and AGQS concentrations are: PFOA 0.012 µg/L; PFOS 0.015 µg/L; PFHxS 0.018 µg/L, PFNA 0.011 µg/L.

Eversource has conservatively assumed that soil and groundwater between Gundalow Landing and the Portsmouth Substation may be impacted by PFCs and will require the Contractors to manage soil and groundwater accordingly.

[Comments from Gregg Comstock of the NHDES Watershed Management Bureau \(WMB\) regarding excavation dewatering via discharges to surface waters](#)

[Gregg's review is focused on compliance of these discharges with NH surface water quality standards (Env-Wq 1700)]

I. Excavation Dewatering

- a. On February 11, 2019, and June 27, 2019, EPA authorized the discharge of groundwater associated with excavation dewatering activities in accordance with the EPA Dewatering General Permit (DGP) into Little Bay on the Newington (Gundalow Landing) and Durham side of Little Bay. Please include a copy of these authorizations in the Plan.

Due to file size, Eversource has provided the NPDES DGP and RGP documents to NHDES as separate files.

- b. As discussed on May 15, 2019, please state in the Plan that the discharge pipe associated with the DGP on the Newington side will be submerged whenever discharges occur and obtain any necessary permits from the NHDES Wetlands Bureau to extend the discharge pipe over the mudflats.

Eversource has addressed this comment.

SEE SGMP, Appendix C-2, pg 2, 2nd to last paragraph (pg 259 of PDF)

Discharge from the treatment system shall be through an approximately 4 to 6-inch diameter hose that shall be positioned within the impact area associated with the Little Bay submarine cable installation as shown on the project environmental maps with the discharge located beyond the mudflats into the channel of Little Bay, approximately 450 to 500 feet from shore. The discharge point shall be placed in a fixed position within the water column, approximately 2 feet above the bottom in the channel of Little Bay. The discharge will be periodically monitored to ensure its positioning.

- c. Please confirm in the Plan that groundwater associated with excavation dewatering will only be handled by the following three methods:
- Discharge to Little Bay in accordance with the EPA NPDES DGP (there are only two of these as discussed in comment 1.a. above);
 - Discharge to Knights Brook in accordance with EPA authorization (pending) to discharge in accordance with the EPA NPDES Remediation General Permit (RGP);
 - Pumping to a temporary holding tank which will then be transported to an offsite treatment facility in accordance with all applicable laws and regulations.

Confirmed.

- d. With regards to the NOI for the RGP, NHDES has reviewed the June 28, 2019 NOI addendum submitted by GZA to EPA and has provided comments to EPA. We commented that although the 7Q10 and Dilution Factor were updated in the NOI form and the calculations, the 7Q10 is still incorrect in the RGP limits spreadsheet (the spreadsheet shows the 7Q10 is 0.0384 mgd, when it should be 0.000389 mgd) and needs to be corrected.

The 7Q10 was calculated correctly using the 0.000389 mgd value. The later reference to 0.0384 mgd was a typo and is not the value used in the calculation. An updated version of the 7Q10 calculations has been provided as a separate PDF file.

We also requested more information on the liquid phase carbon filtration vessel that will be used to reduce PFC concentrations (manufacturer and technical specifications, and performance with regards to PFC removal efficiency). We understand that EPA will be sending a letter (or email) to GZA which will include our comments and any additional comments they may have. Also, in the Plan, please add a requirement that the concentration of PFAS chemicals in the discharge to Knights Brook shall be no greater than the concentrations in Knights Brook just upstream of the discharge.

This comment has been addressed.

SEE SGMP Appendix C-2, Pg 2 and 3 (pg 259 and 260 of PDF)

- o **Frink Farm - Groundwater generated during dewatering in the area of Frink Farm will be discharged onsite under a NPDES Remediation General Permit (Permit Pending). Groundwater will be pre-treated for sediment removal using holding tanks for settling larger suspended solids and discharging to dewatering bags for filtration of finer sediment. Water will be pumped into a second holding tank where it will be treated for PFCs using a carbon filter system. Refer to the Remediation General Permit Addendum dated June 27, 2019 for the Frink Farm property for treatment system information provided by the dewatering subcontractor, Lockwood. Following**

appropriate residence time for treatment, the water will be sampled consistent with RGP requirements prior to discharge into Knights Brook. Lockwood estimates a holding time of approximately 20 minutes and a 90 to 95% performance efficiency for the carbon vessels. Additionally, confirmatory PFC samples shall be collected from the effluent and shall be no greater than concentrations of PFCs in Knights Brook just upstream of the discharge.

2. Other

- a. The document is somewhat difficult to follow; a Table of Contents would be helpful.

[Agreed a Table of Contents has been provided.](#)

- b. Section 5.2.1, 3rd paragraph: The last sentence beginning with “ Characterization for Off-site Reuse” is incomplete. Please revise.

[This incomplete sentence has been deleted.](#)

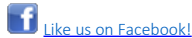
- c. Appendix C title page showing the titles of Appendices C-1 through C-4. To be consistent with the rest of the document, we recommend the following revisions (shown in strikethrough and in bold font) to the Appendix C-2 title: “ Appendix C-2 Construction Dewatering Plan Details for Dewatering at Three Locations Requiring a EPA NPDES ~~Construction Dewatering~~ **and** or Remediation General Permits for Discharge to Surface Water Bodies”.

[This edit has been made.](#)

Thank you for the opportunity to comment. Should you have any questions, please do not hesitate to contact me or Peter Sandin.

Regards,
Gregg

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From: kurt.nelson@eversource.com <kurt.nelson@eversource.com>

Sent: Tuesday, June 18, 2019 7:12 PM

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Subject: 20190619 Updated SRP Soil & GW Management Plan

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