



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Robert R. Scott, Commissioner**

EMAIL ONLY

June 8, 2022

Dr. Dean Shankle  
 Town Hall, Second Floor  
 2 Main Street  
 Amherst, NH 03031

Subject: Amherst – Amherst Street/Cobbler Lane Area  
 DES Site #202203049, SITEEVALHW Project #40542

**Request for Focused Site Investigation**

Dear Dr. Dean Shankle:

The New Hampshire Department of Environmental Services (NHDES) has reviewed a letter from Chief Matthew Conley of the Amherst Fire Department dated June 2, 2022 in regard to historical storage and use of Class B Aqueous Film-Forming Foam (AFFF) at the Fire Department located at 177 Amherst Street. NHDES originally requested information in a letter dated April 11, 2022 based on the detection of per- and polyfluoroalkyl substances (PFAS) above the associated Ambient Groundwater Quality Standards (AGQS) in a private drinking water supply well at 2 Cobbler Lane. The Town of Amherst Fire and Police Department Complex is situated immediately upgradient of this property and NHDES became concerned about the potential for historical and/or on-going AFFF use to be a possible source of the observed groundwater contamination.

NHDES has since expanded our drinking water quality sampling efforts in the immediate area and has identified additional impacts above applicable AGQS at 3, 4, and 5 Cobbler Lane, and 6 Thatcher Drive. The table below provides an updated summary of these results for four regulated PFAS compounds including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), and perfluorononanoic acid (PFNA).

Sample Location	Sample Date	PFOA	PFOS	PFNA	PFHxS
		AGQS=12ng/L	AGQS=15ng/L	AGQS=11ng/L	AGQS=18ng/L
2 Cobbler Lane	2/15/2022	<b>18.9</b>	<b>224</b>	0.62	<b>154</b>
3 Cobbler Lane	4/25/2022	<b>18</b>	<b>380</b>	0.27 J	<b>250</b>
4 Cobbler Lane	4/27/2022	<b>27</b>	<b>540</b>	0.65 J	<b>410</b>
5 Cobbler Lane	4/25/2022	5.9	<b>71</b>	<1.9	<b>65</b>
6 Thatcher Drive	4/27/2022	<b>14</b>	<b>190</b>	0.37 J	<b>130</b>

Notes:

- ng/L = nanograms per liter
- J = concentration is estimated
- Bold = exceedance of AGQS

We understand that the Town has offered temporary bottled water as an alternative source of potable water to the above impacted properties. NHDES greatly appreciates the Town's proactive approach to addressing drinking water quality concerns in this area.

NHDES also appreciates the information provided by Chief Conley, and after review, we generally understand the following:

- AFFF was historically used / stored at the Fire Department between 1988 and 2000.
- On-site training with AFFF occurred in the rear paved and gravel areas.
- Cleaning of equipment occurred both inside the building as well as outside.
- An active floor drain discharges to the stormwater conveyance system in the southeast portion of the property.
- The building is serviced by a septic system and leach field, with the leach field located in the general area of the former fire training area.

In consideration of the above information and the drinking water quality impacts adjacent to and downgradient of the Fire Department, a discharge of PFAS-containing materials (AFFF) appears to have occurred at the Fire Department; however, the location of release(s) and the extent of the impacts have not yet been confirmed. The Town of Amherst, as the owner of the property, has been identified as the party responsible to investigate and potentially remediate the impacts in accordance with Env-Or 600 Contaminated Site Management rules. Consequently, NHDES is requiring the Town to conduct a Focused Site Investigation to further evaluate potential source(s), nature, and extent of PFAS contamination at the Fire Department and in the Amherst Street/Cobbler Lane/Thatcher Drive area. NHDES is requesting a schedule for investigation be submitted within 60 days of receipt of this letter.

Please note that the Focused Site Investigation must be completed by, or under the direction of, a professional engineer or professional geologist licensed in the State of New Hampshire under RSA 310-A, and the report shall bear the seal of the professional responsible for the work. A list of companies that conduct Site Investigations is available at:

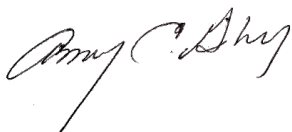
<https://www4.des.state.nh.us/WasteReports/Menu.aspx>

NHDES does not pre-qualify consultants on this list; therefore, NHDES strongly recommends that you review a firm's experience and qualifications prior to retaining them to conduct the required work.

NHDES is available to work with you and your consultant to define an appropriate scope of work and adjust the schedule if appropriate. NHDES will provide guidance on the need for further investigation, remediation, or closure of this project after we have reviewed the Focused Site Investigation report.

Should you have any questions about the Focused Site Investigation discussed herein, please do not hesitate to contact me directly at NHDES' Waste Management Division.

Sincerely,



Amy Gibney  
Hazardous Waste Remediation Bureau  
Tel: (603) 271-7022  
Email: [Amy.E.Gibney@des.nh.gov](mailto:Amy.E.Gibney@des.nh.gov)

Dr. Dean Shankle

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ec: Roy Olsen, Amherst Deputy Fire Chief  
Matthew Conley, Amherst Fire Chief  
Amherst Health Officer  
Amy Doherty, P.G., State Sites Supervisor, HWRB