Lead and Asbestos Survey and Sampling Reports and Letter
(Scott Lawson Group, 1999)

The Scott Lawson Group, Ltd.
Environmental, Health & Safety Consultants

October 14, 1999

Mr. Joseph Griffiths
Hill Mill Realty
428 Central Street
Franklin, New Hampshire 03235

Re: Asbestos and Lead Survey at former Beck Woolen Mill
SLGL File Number 990666

Dear Mr. Griffiths:

EXECUTIVE SUMMARY

On September 28, 1999, an Asbestos and Lead Survey was performed by Health and Safety (H&S) Professionals with *The Scott Lawson Group, Ltd. (SLGL)*. The inspection was performed at the former Beck Woolen Mill located on West Mill Street in Hillsborough, New Hampshire. Included with this report are the analytical results of all bulk samples collected during the inspection, a discussion of the findings of the inspection, recommendations, and general cost estimates for abatement or disposal. Final report review was conducted by Gregory Stevenson, Director of Technical Services.

Asbestos-Containing Building Materials (ACBM) were identified in the form of thermal system insulation, roofing materials, electrical insulation paper, cement board panels, and window glazing. Lead-Based Paint (LBP) was identified on most exterior surfaces and in the interior of the Main Mill building. The analytical results can be found in Appendices A, B and C.

Asbestos-Containing Materials (ACM) must be abated prior to activities such as renovation or demolition, which may disturb the materials. Due to the presence of LBP, demolition and disposal of certain building materials must be performed in accordance with Federal and State regulations.

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(603) 228-3610 ◆ (800) 645-7674 ◆ FAX (603) 228-3871

DISCUSSION

The buildings at the former Beck Woolen Mill site are generally of wooden post and beam construction. The Main Mill is a three-story structure with a large Boiler Room. Most interior walls, floors and ceilings are wood or wood panels, with fiberglass insulation above ceilings and behind walls in some locations. The western end of the Main Mill building has already been partially demolished, and there are large debris piles along the south side of the Main Mill building as well.

Asbestos

A walkthrough was first conducted on each floor and area of the Main Mill and Storage Building with suspect ACM being categorized into homogeneous groups, as needed. Forty (40) samples were collected throughout the two buildings and analyzed for Asbestos content. The following table lists the location, quantity, and general condition of the ACBM identified at the former Beck Woolen Mill site.

Main Mill Building

Location	ACM	Approximate Quantity	General Condition
Second floor, north side around electrical boxes	White Insulation Paper	70 ft^2	Fair-Poor
Main Roof	Roofing Material and flashing tar	13,300 ft^2	Fair
Front Overhang, in debris pile	Roof Flashing tar	160 ft^2	Fair
Boiler Room	Thermal System Insulation, including boiler, breeching and tank insulation	1	Fair-Poor
Boiler Room Roof	Roofing Material and flashing tar	1	Fair

Square feet = ft^2

1 - These materials were not quantified at the time of the survey. Plans for this area of the Main Mill do not include demolition.

The Storage Building at the Beck Woolen Mill site is located to the east of the Main Mill Building. Part of the western end of the building has been burned and debris from the roof has collapsed into the building interior.

Storage Building

Location	ACM	Approximate Quantity	General Condition
Walls and Ceilings in center area	Cement Board Panels (also known as Transite®) **2**	2,185 ft^2	Fair
Main Roof and debris in burned section	Roofing Material	3,500 ft^2	Fair-Poor
Along river side of building	Window Glazing	10 windows (3' x 5' each)	Fair

Square feet = ft^2

2 Cement board panels are presumed to be ACM, based on the experience of the Inspector, and appearance of the materials. No samples were collected of this material.

Lead-Based Paint

Demolition or renovation activities (or maintenance actions) which may disturb or dislocate LBP may cause Lead-containing dust particulate to be released into the atmosphere, thereby creating a potential health hazard to workers, building occupants, and public in the vicinity. Contractors performing work, which may disturb LBP, should apprise all of his or her workers, supervisory personnel, and Subcontractors who shall be on the job site of the seriousness of the health hazards and proper work procedures, which must be followed. Health hazards related to exposure to Lead generally affect infants, children under the age of 7 years old, and women of childbearing age. Risks to children include damage or potential damage of the brain and central nervous system. Recent studies on middle-aged adult males have indicated a relationship between exposure to Lead and high blood pressure, as well as reproductive hazards to both men and women.

In addition to the bulk samples collected of suspect ACM, *SLGL* collected five (5) paint chip samples for Lead. Three (3) of the samples exceeded the State of New Hampshire and the U.S. Housing and Urban Development (HUD*) guideline for Lead of 0.5 percent (0.5%). Concentrations in these three (3) samples ranged from 1.0% to 6.1% (See Appendix B).

* HUD - U.S. Housing and Urban Development. This guideline is used to determine whether Lead is present in paint at a concentration that may be of concern to building occupants, particularly infants or young children. From an OSHA compliance aspect, it is not necessarily the concentration of Lead present in the sample that is of concern, but the concentration that may be rendered airborne during renovation or demolition activities, exposing the general public, workers and building occupants to Lead.

Location of LBP	Paint Color
Exterior of Main Mill and Storage Building	Red
Main Mill, interior walls in Boiler Room	Brown/Black
Main Mill, interior walls and beams	Dark Green

In addition to the paint chip samples, *SLGL* collected one composite sample of the exterior clapboard siding that was scheduled to be disposed of as construction debris. The sample was analyzed according to the Toxicity Characteristic Leachate Procedure (TCLP) to determine hazardous waste content, and to determine if the materials exceed the Resource Conservation and Recovery Act (RCRA) disposal guidelines for Lead.

The TCLP results, 115 milligrams of Lead per liter (115 mg/L), showed the siding material **exceeds** the regulatory limit for Lead of 5.0 mg/L. Therefore, the siding material, if disposed of by itself, cannot be disposed of as regular construction debris. See Appendix C for TCLP results.

ABATEMENT COST ESTIMATES

ACM must be removed prior to demolition of a building or if it will be disturbed during a renovation project. Much of the ACM identified at the former Beck Woolen Mill site, particularly in the Boiler Room, is in poor condition. Asbestos abatement of any kind is highly regulated, by State and Federal agencies, and must only be performed by trained and licensed personnel.

The cost estimates provided should only be used as a preliminary budget figure. Costs associated with any Asbestos removal project can vary greatly depending on the amount, location, and how much an abatement contractor wants the job. The following table lists the estimated abatement costs, **for abatement contractors only,** for the removal and disposal of the ACM based on average costs from similar type projects we have managed.

Location	Material	Estimated Abatement Cost
Main Mill Building	Roofing Materials and flashing tar	$27,000.00 to $53,850.00
Main Mill Building	Electrical Insulation Paper	$500.00
Storage Building	Cement Board Panels	$4,400.00 to $7,000.00
Storage Building	Roofing Materials	$7,000.00 to $14,000.00
Storage Building	Window Glazing	$400.00 to $500.00

Total estimated cost for the removal of all ACM in the Main Mill Building is:
$27,500.00 to $54,350.00

Total estimated cost for the removal of all ACM in the Storage Building is:
$11,800.00 to $21,500.00

CONCLUSION

ACM and LBP have been identified at the former Beck Woolen Mill, both in the Main Mill and the Storage Building. Asbestos was identified in the form of thermal system insulation, roofing materials, electrical insulation paper, cement board panels, and window glazing. LBP was identified on most exterior surfaces and in the interior of the Main Mill building. Laboratory analytical results for all samples collected during the survey can be found in Appendices A, B and C. Abatement cost estimates have been provided in the previous section. These abatement costs are preliminary budget figures only, actual abatement costs will vary.

RECOMMENDATION

Based on the results of the survey, *SLGL* has the following general recommendations:

- State of New Hampshire and Federal regulations require the removal of ACM prior to demolition, or if the ACM is directly impacted by renovation or refurbishing activities. Asbestos removal operations may only be conducted by trained and accredited personnel in accordance with State and Federal regulations. The abatement of exterior ACM/ACBM is regulated by New Hampshire Department of Environmental Services regulations; typically a Site Safety Plan detailing abatement and air monitoring methods are required.

- Hill Mill Realty should consider selective resampling and analysis of demolition debris for Lead by TCLP. The additional samples should include composite (mixed together) samples of all types of demolition debris that will be sent out for disposal, not just the clapboard siding. In the absence of the additional sampling, the red painted clapboard siding must be disposed of as hazardous waste.

- OSHA standards 29 CFR § 1910.1001, *Asbestos*, 29 CFR § 1910.1025 *Lead* and 29 CFR § 1910.1200, *Hazard Communication*, contain requirements for informing employees and building occupants of the presence of hazardous materials such as Asbestos and Lead, along with providing them information on health effects and preventative measures.

We trust you will find everything in order; however, should you have any questions or comments regarding the contents of this report, the inspection, analytical results or project design/air monitoring services, please contact either Matt Comai, Client Services; or me at your earliest convenience.

Sincerely,

The Scott Lawson Group, Ltd.

Richard Lent

Richard Lent
Health and Safety Professional

Enclosure

SLGL Data :99Reports:Hill Mill Realty, Mill Survey Final Report (DL)

WARRANTY

The conclusions and recommendations contained in this report are based on the information available to *SLGL* as of September 28, 1999. *SLGL* provides no warranties on information provided by third parties and contained herein. Data compiled were in accordance with *SLGL's* approved scope of services and should not be construed beyond their limitations. Any interpretations or use of this report other than those expressed herein are not warranted. The use, partial use, or duplication of this report without the expressed written consent of *The Scott Lawson Group, Ltd.*, is strictly prohibited.

APPENDIX A

BULK SAMPLE ANALYSIS RESULTS - ASBESTOS

The Sc : Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 8, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135471	092899-666-B01A, Black Flooring Paper, 1st Floor	No	Yes	Yes	Black, Brown	----	----	----	----	60	----	<1	>39
135472	092899-666-B01B, Black Flooring Paper, 2nd Floor	No	Yes	Yes	Black, Brown	----	----	----	----	60	2	2	36
135473	092899-666-B01C, Black Flooring Paper, 3rd Floor	No	Yes	Yes	Black, Brown	----	----	----	----	60	----	<1	>39
135474	092899-666-B02A, Window Glazing, 1st Floor, River Side	No	Yes	Yes	Cream, Brown, Green	----	----	----	----	<1	----	<1	>98
135475	092899-666-B02B, Window Glazing, 3rd Floor, River Side	No	Yes	Yes	Cream, Brown, Green, Black	----	----	----	----	<1	----	----	>99
135476	092899-666-B02C, Window Glazing, 3rd Floor, River Side	No	Yes	Yes	Cream, Green, Brown	----	----	----	----	<1	----	<1	>98

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SLGL laboratory certifications apply only to samples analyzed in-house.

NVLAP Accrediatation Number 101228
Analytical Methodology: 600/R-93/116 July 1993

TTP = Test Till Positive

Analyzed By : Billy D Martin
for Ronald B. Sabin

Approved By : Jennifer Scott
Jennifer Scott, Lab Manager

{Asb. Bulk}

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Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 12, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrou Material
135477	092899-666-B03A, Insulation Paper, 2nd Floor, Electrical Cabinets	No	Yes	Yes	Lt. Gray, Brown	70	----	----	----	<1	----	----	>29
135478	092899-666-B03B, Insulation Paper, 2nd Floor, Electrical Cabinets	No	Yes	Yes	Lt. Gray, Green, Gray	40	----	----	----	20	3	----	37
135479	092899-666-B04A, Pipe Wrap, 3rd Floor, Stairwell	No	Yes	Yes	Dk. Brown, Brown	----	----	----	40	----	----	40	20
135480	092899-666-B04B, Pipe Wrap, 2nd Floor, Stairwell	No	Yes	Yes	Dk. Brown, Gray	----	----	----	----	<1	----	70	>29
135481	092899-666-B05A, Ceiling Panels (Gray), 1st Floor, River Side	No	Yes	Yes	Gray, Brown, Tan	----	----	----	----	90	----	----	10
135482	092899-666-B05B, Ceiling Panels (Brown), 1st Floor, River Side	No	Yes	Yes	Gray, Brown, Tan	----	----	----	----	90	----	----	10

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NVLAP Accrediatation Number 101228
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Analyzed By : Kelly D Martin for Ronald B. Sabin

Approved By : Jennifer Scott, Lab Manager

{Asb. Bulk}

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Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 8, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135483	092899-666-B05C, Ceiling Panels (Gray), Basement	No	Yes	Yes	Gray, Brown, Tan	----	----	----	----	90	----	----	10
135484	092899-666-B06A, Ceiling Panels (Brown), 1st Floor, River Side	No	Yes	Yes	Brown, Dk. Brown, Black	----	----	----	----	90	----	----	10
135485	092899-666-B06B, Ceiling Panels (Brown), 1st Floor, River Side	No	Yes	Yes	Brown, Black	----	----	----	----	90	1	2	7
135486	092899-666-B07, Thermal System Debris, Basement, Boiler Room, on Ground	No	Yes	Yes	Gray, Black	40	----	----	5	----	----	----	55
135487	092899-666-B08, Tank Insulation, Basement, Water Tank	No	Yes	Yes	Lt. Gray, Gray	50	----	----	<1	----	----	----	>49
135488	092899-666-B09, Breeching Insulation, Boiler Room, Upper Level	No	Yes	Yes	Cream, Gray	30	----	----	20	----	----	----	50

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Analyzed By : Kelly D. Martin
c/ Ronald B. Sabin

Approved By : Jennifer Scott
Jennifer Scott, Lab Manager

{Asb. Bulk}

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Report Date : October 8, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135489	092899-666-B10, Roofing Material, Boiler Room Roof, Bottom Layer	No	Yes	Yes	Black, Brown	5	----	----	----	<1	----	<1	>93
135490	092899-666-B11, Roofing Material, Boiler Room Roof, Top Layer	No	Yes	Yes	Black, Gray	<1	----	----	<1	25	----	----	>73
135491	092899-666-B12, Roofing Material, Boiler Room Roof, Flashing Tar	No	Yes	Yes	Black, Cream, White	10	----	----	----	5	----	----	85
135492	092899-666-B13, Roofing Material, Main Roof, Center Ridge, Top Layer	No	Yes	Yes	Black, Gray	----	----	----	30	7	----	----	63
135493	092899-666-B14, Roofing Material, Main Roof, Center Ridge, Bottom Layer	No	Yes	Yes	Black, Gray	<1	----	----	5	25	<1	----	>68
135494	092899-666-B15, Roofing Material, Main Roof, Bottom Layer	No	Yes	Yes	Black, Brown	----	----	----	----	40	<1	<1	>58

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for Ronald B. Sabin

Approved By : Jennifer Scott
Jennifer Scott, Lab Manager

{Asb. Bulk}

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Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 8, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135495	092899-666-B16, Roofing Material, Main Roof, Top Layer	No	Yes	Yes	Black, White	5	----	----	2	10	----	----	83
135496	092899-666-B17, Roofing Material, Main Roof, Flashing Tar	No	Yes	Yes	Black, White	10	----	----	<1	<1	----	----	>88
135497	092899-666-B18, Roofing Material, Front Overhang, Main Layer	No	Yes	Yes	Black, Gray, White, Brown	<1	----	----	----	30	----	----	>69
135498	092899-666-B19, Roofing Material, Front Overhang, Bottom Layer	No	Yes	Yes	Black, Gray	10	----	----	----	1	----	----	89
135499	092899-666-B20, Roofing Material, Rear Overhang, Bottom Layer	No	Yes	Yes	Black, Brown, Gray	<1	----	----	----	30	<1	----	>68
135500	092899-666-B21, Roofing Material, Rear Overhang, Top Layer	No	Yes	Yes	Black, White	----	----	----	15	10	<1	----	>74

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NVLAP Accrediatation Number 101228
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Analyzed By : Kelly D Martin
for Ronald B. Sabin

Approved By : Jennifer Scott
Jennifer Scott, Lab Manager

{Asb. Bulk}

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Environmental, Health & Safety Consultants
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Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 7, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill Storage Bldg.

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135506	092899-666-B22A, Siding Paper, Front Side, Under Clapboards	No	Yes	Yes	Brown, Red	----	----	----	----	80	----	<1	>19
135507	092899-666-B22B, Siding Paper, Front Side, Under Clapboards	No	Yes	Yes	Brown, Gray	----	----	----	----	75	----	----	25
135508	092899-666-B23, Cement Board Panels, Interior, West End	No	Yes	Yes	Gray	35	----	----	----	<1	----	----	>64
135509	092899-666-B24, Roofing Material, Debris, in Burned Section	No	Yes	Yes	Black	3	----	----	----	30	----	----	67
135510	092899-666-B25, Roofing Material, Debris, on River Side of Building	No	Yes	Yes	Black	4	----	----	----	12	1	----	83
135511	092899-666-B26, Suspect Debris, Building Crawlspace	No	No	No	Gray	----	----	----	----	<1	----	----	>99

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NVLAP Accrediatation Number 101228
Analytical Methodology: 600/R-93/116 July 1993

TTP = Test Till Positive

Analyzed By : Keyna M. Vaillancourt for John P. Welch

Approved By : Jennifer Scott, Lab Manager

{Asb. Bulk}

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Environmental, Health & Safety Consultants
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Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 7, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Sampler : RAL
Client Project : Beck Woolen Mill Storage Bldg.

Analyte : PLM/DS

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos % Chrysotile	Asbestos % Amosite	Asbestos % Crocidolite	Other Fibrous Material % Fibrous Glass	Other Fibrous Material % Cellulose	Other Fibrous Material % Synthetic	Other Fibrous Material % Other	Non Fibrous Material
135512	092899-666-B27A, Window Glazing, River Side	No	Yes	Yes	White	4	----	----	----	----	----	<1	>95
135513	092899-666-B27B, Window Glazing, River Side	No	Yes	Yes	White	5	----	----	----	----	----	<1	>94
135514	092899-666-B28A, Flooring Paper, Interior, Center	No	No	Yes	Brown	----	----	----	----	75	----	----	25
135515	092899-666-B28B, Flooring Paper, Interior Center	No	No	Yes	Brown	----	----	----	----	80	----	----	20

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Analyzed By : Keyra M. Vaillancourt
for John P. Welch

Approved By : Jennifer Scott, Lab Manager

{Asb. Bulk}

The Scott Lawson Group, Ltd.

Environmental, Health & Safety Consultants

29 River Road, Suite 18
Bow, New Hampshire 03304
(603) 228-3610
Fax: (603) 228-3871
E-Mail: slgllab@conknet.com

Results by 10/6

Company: Hill Mill Realty

Attention:

Address:

Phone #:

Fax #:

SLGL Job #: 990666

Client Project: Beck Woolen Mill - Storage Bldg.

Client PO:

Collected By: D. Lant

10 day 5 day RUSH _____

Contact Laboratory prior to requesting RUSH analysis

Matrix: A= Air, W= Water, S= Soil/Sludge, O= Oil, E= Extract, X= Other

SLGL Lab #	Sample Identification	Analysis	Date	Time	Preservative	4°C	Matrix	Media / Container	Air Volume	Minutes
1355D6	092899 - 666 - B22A	PLM / DS	9/28/99	—	—	—	X	Bulk	—	—
07	- B22B			—	—	—				
08	- B23			—	—	—				
09	B24			—	—	—				
10	B25			—	—	—				
11	B26			—	—	—				
12	B27A			—	—	—				
13	B27B			—	—	—				
14	B28A			—	—	—				
15	B28B			—	—	—				

Comments: In Good Condition

Relinquished By:	Date:	Time:	Accepted By:	Date:	Time:
[illegible]	9/28/99	1:25pm	Linda Callowing	9/28/	91.2 pm

WHITE - Laboratory YELLOW - Results PINK - Client

APPENDIX B

SAMPLE ANALYSIS RESULTS - LEAD

The Scot Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 4, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Collected by : MA
Client Project : Beck Woolen Mill

Analyte : Lead
Methodology : SW-846-6010

SLGL Lab#	Sample Description	mg/kg	%	Date Analyzed	Analyst
135501	092899-666-L01, Green Paint, 1st Floor, Walls and Posts	9745	1.0	10/1/99	KDM
135502	092899-666-L02, Light Green Paint, 1st Floor, Wall	500	0.050	10/1/99	KDM
135503	092899-666-L03, Gray Paint, 1st Floor, North Wall	2532	0.25	10/1/99	KDM
135504	092899-666-L04, Brown/Black Paint, Boiler Room, Paint Covering Brick Walls	61403	6.1	10/1/99	KDM
135505	092899-666-L05, Red Paint, Outside, Paint of Building, Taken From East Side, Near Entrance	29903	3.0	10/1/99	KDM

All Analyses performed in accordance with U.S.E.P.A. Methods for Chemical Analysis of Water and Waste, EPA-600/4-79-020, Standard Methods for the Examination of Water and Wastewater or Test Methods for Evaluating Solid Waste, SW-846, or as otherwise noted. SLGL laboratory certifications apply only to samples analyzed in-house.

ND = None Detected
* = Sample was analyzed outside of EPA holding time
< = Less than

Reviewed By : Kelly D Martel

Approved By : Jennifer Scott, Lab Manager

{solids.analyte}

The Scott Lawson Group, Ltd.

Environmental, Health & Safety Consultants

29 River Road, Suite 18
Bow, New Hampshire 03304
(603) 228-3610
Fax: (603) 228-3871
E-Mail: slgllab@conknet.com

Company: Hill Mill Realty

Attention: MA

Address:

Phone #:

Fax #:

SLGL Job #: 990666

Client Project: Berk Woolen Mill

Client PO:

Collected By: MA

results by 10/6/99

10 day (5 day) RUSH _____

Contact Laboratory prior to requesting RUSH analysis

Matrix: A= Air, W= Water, S= Soil/Sludge, O= Oil, E= Extract, X= Other

SLGL Lab #	Sample Identification	Analysis	Date	Time	Preservative	4°C	Matrix	Media / Container	Air Volume	Minutes
135501	092899-666-L01	LEAD	9/28	–	–	–	x	Bulk	–	–
02	L02									
03	L03									
04	L04									
05	L05									

Comments: In Good Condition

Relinquished By:	Date:	Time:	Accepted By:	Date:	Time:
Matthew [illegible]	9/29/99	1:00	Linda Lahey	9/28/99	7:00 pm

WHITE - Laboratory YELLOW - Results PINK - Client

APPENDIX C

SAMPLE ANALYSIS RESULTS - TCLP LEAD

The Scott Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

Hill Mill Realty
428 Central Street
Franklin NH 03235

Report Date : October 14, 1999
SLGL Job # : 990666
Date Sampled : 9/28/99
Date Received : September 28, 1999
Collected by : MA
Extraction Date: 9/28/99
Client Project : Beck Woolen Mill

Sample Description : 092899-666-L01, Wood, From Demo Side of Building

SLGL Lab#	Analyte	Methodology	Result mg/L	Regulatory Limit mg/L	Detection Limit mg/L	Date Analyzed	Analyst
135516-2	Lead	EPA 200.7	115	5.0	0.020	10/5/99	KDM

These samples were prepared by method SW-846-1311, TCLP. All analyses performed in accordance with U.S.E.P.A., SW-846 Methodology, Standard Methods for the examination of water or methods as stated. Units are in milligrams per liter or as noted. SLGL laboratory certifications apply only to samples analyzed in-house.

< = Less than
* = Samples were analyzed outside of the EPA holding time

Reviewed By : Kelly Martel

Approved By : Jennifer Scott
Jennifer Scott, Lab Manager

{TCLP}

UST Closure Report
(NHDES, 2000)

The Scott Lawson Group, Ltd.

Environmental, Health & Safety Consultants

29 River Road, Suite 18
Bow, New Hampshire 03304
(603) 228-3610
Fax: (603) 228-3871
E-Mail: slgllab@conknet.com

Compa: Hill Mill Realty

Attention: MA

Address:

Phone #:

Fax #:

SLGL Job #: 99D660

Client Project: Beck, Willow Mill

Client PO:

Collected By: MA

by 10/6/99

10 day **5 day** **RUSH** _____

Contact Laboratory prior to requesting RUSH analysis

Matrix

A= Air O= Oil
W= Water E= Extract
S= Soil/Sludge X= Other

SLGL Lab #	Sample Identification	Analysis	Date	Time	Preservative	4°C	Matrix	Media / Container	Air Volume	Minutes
135511	092899-666-101	TCLP - Pb	9/28	—	—	—	X	—	—	—
	Wood, From Demo									
	Side of Building	(IAN) 10/6/99 Rec MA								

Comments: good condition

Relinquished By:	Date:	Time:	Accepted By:	Date:	Time:
[illegible]	10/6/99	1:40	Tanya Vaillancourt	9/28/	1:40

WHITE - Laboratory YELLOW - Results PINK - Client

APPENDIX D

SAMPLING METHODOLOGY

SAMPLING METHODOLOGY

Samples for ACM:

A walkthrough of each area included in the survey was first conducted to determine the type and locations of suspect ACM. After this had been completed, *SLGL's* H&S Professional then proceeded to collect samples of the suspect materials and submit them to be analyzed for possible Asbestos content.

Suspect ACM was identified and categorized into homogeneous categories, if necessary. Homogeneous means uniformity in texture, color, and appearance. A typical sampling scenario during this project may have consisted of:

1. The inspector, equipped with appropriate protective equipment and sampling gear, moistens the area where the sample is to be collected. A wetting agent is added to prevent disturbance of the material and the release of fibers into the air.

2. The sample is extracted using a clean knife and/or tweezers. The inspector cuts a small piece of material penetrating all layers.

3. The sample is placed in a labeled container and sealed. The exterior of the container is then wet-wiped clean.

4. Sampling tools are cleaned and any fallen debris is cleaned with a High-Efficiency, Particulate Air (HEPA) vacuum.

Samples were then delivered to *SLGL's* laboratory for analysis. The samples were analyzed for possible Asbestos content utilizing the EPA Method 600/R-93/116, July 1993, which incorporates the use of Polarized Light Microscopy (PLM).

Bulk samples for Lead:

Paint chip samples for Lead were collected by utilizing a knife or other sampling tool to collect a representative amount of suspect LBP. The samples were placed in labeled sample bags and sealed. Upon completion of the sample collection, the samples were returned to *SLGL's* American Industrial Hygiene Association-accredited (AIHA No. 342) laboratory and analyzed utilizing the appropriate Environmental Protection Agency (EPA) Method.

Composite samples for TCLP analysis were collected by obtaining a section of the entire thickness of the clapboard material, cutting it into smaller pieces and submitting the entire material to the laboratory for analysis (EPA Methodology 200.7).

Drum Inventory and Removal Action
(NHDES/USEPA 1999-2000)

199909015

DEPARTMENT OF ENVIRONMENTAL SERVICES
WASTE MANAGEMENT DIVISION
WASTE MANAGEMENT COMPLIANCE BUREAU

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

ACTIVITY REPORT

Case No. HWC 99-03 **Confidential** __ **YES** _x_ **NO**

Date: 24 Feb 99 **Time:** 0910 **Location:** Hillsboro, NH

Division Staff: G. Carrigan, M. Galuszka, C. Fortier, T. Caligandes, D. Degler

Other Parties

Name	Affiliation	Address	Tel. No.
Alex Bottomly	Property Manager		464-0228

__ **Tel. Comm.** __ **Interview** _x_ **Inspection** __ **Site Visit** __ **Other**

Samples _x_ **NO** __ **YES Sample No.**
Photographs __ **NO** _x_ **YES**

SUMMARY OF ACTIVITIES

0910-Arrived at 25 West Mill, Street, Hillsboro, NH (Beck Mills) to await the arrival of Mr. Bottomly. Mr. Bottomly arrived at 0925. I explained to Mr. Bottomly that we wanted to assess the site for waste related issues. Based upon our observations, we might take some samples.

Mr. Bottomly has been the building caretaker for the past 11 years. He informed me that most of the drums were located on the first floor. Also, he said that asbestos could be found in the boiler room. He had worked on the maintaining and abating the asbestos in the past. Most of the asbestos is found in the boiler room and transite boards are located in the adjacent smaller building wharehouse).

After discussing the information that Mr. Bottomly provided with other SIS personnel, we started the assessment in the main building. On the first floor he took us into the boiler room, located on the east end of the building. There are two old coal fired boilers in this room, and a newer oil fired boiler. The two old boilers were very large, parts (superstructure) of which extend from the basement up to the third floor. The boilers and piping are covered with asbestosinsulation. Mr. Bottomly informed us that he had taken some of ACM and stored it in one of the old boilers. Several photographs were taken of the boilers.

Along the east wall of the building (first floor) we observed 128, five-gallon pails of roofing cement. These pails were empty. On this floor we located a majority of the drums and other containers of concern. see the attached list and map.

After moving to the second floor, we split into two teams. Mr. Bottomly took Ms. Calligandes and me to the basement (lower level). In the lower level, he showed us the boilers, and the location of a large water storage tank. This tank was coated (insulated) with asbestos. This tank is approximately 7-8' in diameter and 18-20' in length. On the same end of the building as the boilers, we located several drums of lubricants and other chemicals (see list and map). Photographs were taken of the drums on the first and basement levels.

No other waste issues were identified on either the second or third floors by M. Galuszka or D. Degler.

Next, Mr. Bottomly took us to the adjacent building (wharehouse). At one time, the two buildings had

been connected. Along the way he showed the location of an UST. He believes that the tank was installed in the late 70's, and may be 10,000 gallons in capacity. He had pumped as much fuel out of it as he could, burning the fuel in his own home heating system. He stated that there was about 3-4 inches of sludge left in the bottom of the tank, or an estimated 300 gallons of sludge. He believes that this sludge is left over from the #6 fuel once burned at the facility.

In the adjoining building he showed us an area (30'x30') that had been covered over with transite paneling (ACM). This paneling covers the ceiling and the walls. Many of the wall panels had been damaged/broken by vandals. Also, he showed us a stack of drums at one end of this building which we could not reach due to the collapsed roof. He stated that the drums were empty, as he had stacked them in this location.

After reviewing our findings, we decided to go back in the main building, label the drums and take information from them to be used to help determine their contents. It is our opinion that there are three current waste issues at the site. These are:

1. The asbestos containing material (A.C.M.),
2. The chemicals in the drums, and
3. The UST.

Prior to leaving the site, I explained these concerns to Mr. Bottomly. Mr. Bottomly told me to contact him if DES had any other questions.

1210-Secured from the site.

Beck's Mill Container Inventory		
Number	**Size**	**Labeling/Content Information**
B-1	30-gal steel drum	Barclay Chemical Company, Watertown, MA. Volamine (volatile amine)
B-2	5-gal plastic pail	Wolfs Head Special Duty Oil, 15-40w
B-3	30-gal steel drum	NB-95, Nutmeg Chemical Corporation, New Haven, CT
B-4	30-gal steel drum	Black color drum, contents unknown
B-5	5-gal plastic pail	Asphalt roof coating-spilled
B-6	55-gal steel drum	Empty
B-7	55-gal steel drum	Nutmeg Chemical Corporation, Fuel Oil Conditioner
B-8	-	Empty
B-9	55-gal steel drum	Petroleum waste, 1/4 full
B-10	-	Empty
B-11	-	Empty
B-12	55-gal steel drum	Black colored drum, no marking 3/4 full
1-1	55-gal steel drum	Labeled 'Lenospin', ½ full
1-2	55-gal fiber drum	Nopcotex 668, Diamond Shamrock Corporation, Process Chemical Division, 350 Mt. Kimble Ave., Morristown, NJ
1-3	55-gal steel drum	Label is covered (can not read) and drum is frozen to the floor
1-4	55-gal steel drum	Unknown
1-5	55-gal steel drum	Unknown
1-6	55-gal steel drum	Diamond Shamrock Corporation, 'Textilene 970F'

Beck's Mill Container Inventory		
1-7	55-gal steel drum	Unknown
1-8	55-gal steel drum	Believed to be Napxostat 2152-P (?)
1-9	55-gal steel drum	Same as 1-8
1-10	55-gal fiber drum	Diamond shamrock Corporation, Unknown
1-11	55-gal steel drum	Unknown
1-12	55-gal steel drum	Unknown
1-13	55-gal steel drum	Same as 1-8
1-14	55-gal steel drum	Same as 1-8
1-15	15-gal plastic carboy	Believed to be a wool dye
1-16	55-gal steel drum	Unknown
1-17	55-gal steel drum	Unknown
1-18	55-gal steel drum	Unknown
1-19	55-gal steel drum	Textalene
1-20	55-gal steel drum	Lenospin
1-21	55-gal steel drum	Unknown
1-22	5-gal plastic pail	Diamond Shamrock Corporation, ½ full
1-23	55-gal steel drum	Texaco, oil (?)
1-24	55-gal steel drum	Unknown

Beck's Mill Container Inventory		
1-25	55-gal steel drum	Texaco, oil (?)

:\hwc9903a.act

Hillsboro
Woods Mill Site

Wood Woolen Mill Drum Inventory

Drum Number	Drum Size	Contents	Comments	
1	55	Oil	no PCB's	NH
2	30	Alkaline Liquid	pH 12	EPA
3	55	Oil	no PCB's	NH
4	55	Distillate	may be flammable	EPA
5	55	Oil	no PCB's	NH
6	30	Organic Amine	Water Treatment Compound pH 11	EPA
7	30	Alkaline Liquid	ph 11	EPA
8	55	Organic Liquid	Not oil non haz	EPA
9	55	Oil	no PCB's	NH
10	55	Oil	no PCB's	NH
11	55	Grease		EPA
12	55	Oil	no PCB's	NH
13	55	Oil	no PCB's	NH
14	55	Oil	no PCB's	NH
15	55	Oil	no PCB's	NH
16	55	Oil	no PCB's	NH
17	55	Oil	no PCB's	NH
18	30	Grease		EPA
19	55	Grease		EPA
20	20p	Wax or Grease		EPA
21	20p	Alkaline Liquid	pH 12	EPA
22	55	Oil	no PCB's	NH
23	55	Oil & Water		NH
24	55	Oil	no PCB's	NH
25	55	Inorganic Solid	non haz	EPA
26	55	Oil	no PCB's	NH
27	55	Wax or Grease		EPA
28	55	Aqueous Liquid	Probably water	EPA
29	55	Oil & Water		NH
30	55	Oil	no PCB's	NH
31	55	Oil	no PCB's	NH
32	55	Oil	no PCB's	NH
33	55	Aqueous Liquid	Probably water	EPA
34	55	Oil & Water		NH
35	55	Organic Solid	non haz	EPA
36	UST	Oil	no PCB's	NH ← TANK
37	55	Oil & Water		NH
38	55	Oil & Water		NH
39	55	Oil & Water		NH
40	55	Oil & Water		NH
41	55	MT		LEAVE HERE
42	55	Water		"
43	55	Water		"
44	55	MT		"
45	55	Water		"
46	55	Water		"
47	55	Water		"
48	55	Water		"
49	55	Oil & Water		NH
50	55	Water		LEAVE
51	55	Oil & Water		NH
52	55	Water		LEAVE
53	55	Water		LEAVE

OIL
OIL + WATER
NHDES

55 ~~HH~~
~~HH~~
~~HH~~
~~HH~~
~~HH~~
III

State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES
6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-3644 FAX (603) 271-2181

March 22, 2001

Mr. Leon Griffin III
25 West Mill Street
Hillsboro, NH 03244

SUBJECT: Hillsboro-Woods Mill Site,25 West Mill Street: *Tank Closure Report,* February 8, 2001 by Ralph Wickson, HWRB. (UST #0115155) (DES# 199909015)

Dear Mr. Griffin:

The New Hampshire Department of Environmental Services (DES) has reviewed the report for the December 26, 2000, tank closure by Ralph Wickson, HWRB for the 12,000 gallon fuel oil underground storage tank removed at the above referenced facility. Based upon the information contained in the report, DES has concluded that:

1. It does not appear that a discharge of petroleum that would ultimately impact surface water or groundwater of the State has occurred from this tank. Therefore, DES will not require additional investigation or remedial measures related to this tank removal.

2. The owner(s) of this facility must meet the goals of the N.H. Administrative Rules Env-Wm-1403 "Groundwater Management and Groundwater Release Detection Permits", that is, groundwater at the site must continue to meet drinking water quality standards. The owner shall not undertake any activities which might result in Ambient Groundwater Quality Standards being exceeded at the site.

DES reserves the right, under N.H. Administrative Rules Env-Wm-1403 "Groundwater Management and Groundwater Release Permits" and N.H. Administrative Rules Env-Ws 412, "Rules for Reporting and Remediation of Oil Discharges," to require additional hydro-geological investigations and/or remedial measures, if further information indicating the need for such work becomes know.

If you have any questions, please contact me at the Waster Management Division at (603)-271-3644.

Sincerely,

Charles Berube
Oil Remediation & Compliance Bureau

CB/gls:/h:\990915.301
cc: Ralph Wickson, HWRB
Scott Pellerin, USEPA
File

/ #2

STATE OF NEW HAMPSHIRE

RW 2/8/01 **Inter-Department Communication**

FROM: Ralph Wickson
Hazardous Waste Remediation Bureau

DATE: February 8, 2001

SUBJECT: HILLSBORO – Woods Mill Site (Former Beck Mill Trust Property), Permanent Underground Storage Tank (UST) Closure Report for One Unregistered UST (DES #199909015 / UST I.D. #0-115155)

TO: Thomas Beaulieu, Supervisor
UST Compliance Section
Oil Remediation & Compliance Bureau

In accordance with Env-Wm 1401.18, *Underground Storage Tank (UST) Closure Sampling & Reporting Guidelines*, this memorandum serves to document findings regarding permanent closure (i.e., removal & off-site disposal) of one unregistered 12,000-gallon capacity UST at the subject property. Removal activities were conducted on December 22, & 26, 2000. This memorandum is intended to meet the requirements of Env-Wm 1401.18. The UST Closure Notification Form is attached (*Attachment #1*).

I. Site Description

The subject property is identified as 25 West Mill Street, and is shown on the plan entitled, *Small Sub-Division of Land of Woods Woolen Mill Co., Inc., Hillsborough, dated June 30, 1976,* referenced at Book 4206, Page 34 of the Hillsborough County Registry of Deeds. The property consists of an abandoned wooden mill building and brick boiler room (circa 1900) situated immediately adjacent to the Contoocook River. The mill, which has not been active for a number of years, is currently in the process of being demolished.

The owner of record is:

- Mr. Leon Griffin, III.
  25 West Mill Street
  Hillsboro, New Hampshire 03244

The single walled 12,000-gallon capacity UST was identified during an initial site evaluation in September 1999. The evaluation also identified a number of drums containing both hazardous and non-hazardous materials stored within the mill. The UST appeared to have been abandoned for an extended period of time. A figure detailing the location of the UST is attached to this memorandum (*Attachment II*). The Department's database did not include a record of the UST. However, the database did indicate the presence of a No. 2 Heating Oil UST closed in September 1998 (# 0-115155).

A preliminary investigation of the UST indicated the presence of approximately 6 inches of oil and sludge (presumed to be weathered No. 6 Fuel Oil) within the tank. The tank contents were subsequently sampled to confirm the presence of No. 6 Fuel Oil.

II. UST Removal Action

In correspondence dated November 27, 2000, HWRB authorized the Department's clean-up contractor, Franklin Environmental, Inc. (Franklin), to proceed with removal of the non-hazardous drums and UST. Funding for this effort was provided by USEPA under Pollution Removal Funding Authorization No. B01500, issued to the Department on October 26, 2000. Franklin conducted the UST removal work on December 22, & 26, 2000. The work included: (1) confirmatory sampling of the oil/sludge within the UST to determine appropriate disposal method, (2) evacuation, utilizing a vacuum truck, and off-site disposal of 529 gallons of No. 6 fuel oil and sediment (the material was managed as non-hazardous State regulated oil waste), (3) excavation and off-site disposal of the UST, and (4) backfilling the excavation with 84 tons of clean sand fill to existing condition prior to excavation. Metal piping associated with the UST was also removed.

HWRB personnel provided oversight throughout the removal effort and collected soil samples from the excavation zone for on-site headspace screening (HNU). In addition, soil samples were collected from the excavation zone and submitted to the Department's laboratory for VOC, PAH, and TPH analysis in accordance with the requirements of Env-Wm 1401.18, *Sampling & Reporting Guidelines* (July 1999).

III. Significant Findings

- No petroleum odor was evident in soil immediately above or below the UST.
- No positive PID (HNU) readings were observed during UST removal activities.
- Materials removed from the excavation consisted of medium brown to dark brown sandy soil with trace gravel and silt. The top 10 inches of soil was frozen.
- No free product or groundwater was encountered within the excavation;
- A localized area of stained soil, indicative of soil impacted by weathered fuel oil, was observed at the bottom of the excavation. Soil samples were collected from this area and other representative locations immediately beneath the tank and piping system for laboratory analysis in accordance with the requirements of Env-Wm 1401.18.

- The steel single walled UST measured 18' x 10'6". A visual inspection of the interior of the tank after removal of the oil and sediment indicated it to be in fair condition. The exterior of the tank was pitted and an approximately ¼ inch hole was observed in the bottom center of the tank. Photographs taken during the UST removal activities are attached (*Attachment III*).

IV. Analytical Results

As indicated above, no positive PID readings were noted during UST closure activities. Composite soil samples (collected from five discrete locations within the excavation) were obtained in accordance with EPA Method 5035 for laboratory analysis following EPA Methods 8260B (VOC), 8270 (PAH), and 8015-DRO (TPH). No VOCs or PAHs were detected above laboratory quantification limits in the soil samples collected as part of this investigation. The TPH analysis indicated a concentration of 3,300 mg/kg of TPH as fuel oil. This concentration is below the NH S-1 standard of 10,000 mg/kg. Consequently, the soil samples collected for this effort exhibit compliance with RCMP soil standards. The laboratory reports for samples submitted for analysis are attached to this memorandum (*Attachment IV*).

V. UST Disposal

The UST carcass was shipped off-site for recycling as scrap steel. Invoices documenting all work performed by Franklin and all shipping manifests are contained in Department file #199909015.

Based on the above findings, no additional activities associated with this former UST are recommended. Should you have any questions or require additional information, please contact me at the HWRB at 6572.

F:\ust memo

Attachments (I - IV)
cc: John Regan, HWRB (via e-mail)
File

New Hampshire Department of Environmental Services (603) 271-3644 FAX (603) 271-2181

UST CLOSURE NOTIFICATION

1. Telephone Message

Name _____ Initial _____

Date: _____

Street _____ Telephone: _____

City _____ Fax # _____

2. **Facility Registration Number:** Unregistered

Name Former Woods Woolen Mill (Beck Mill Trust) City Hillsboro

Street 25 West Mill Street Telephone _____

3. Owner Name

Name Leon Griffin, III City Hillsboro Telephone: (603) 464-4937

4. Tank Removal Information

*****L=Leaker Suspected; R=Removal; F=Filled in Place*

X R X	L R F	L R F	L R F	L R F
Tank # N/A	Tank #	Tank #	Tank #	Tank #
Size 12,000	Size	Size	Size	Size
Product #6	Product	Product	Product	Product
Will tank be replaced underground? Yes (No)	Will tank be replaced underground? Yes No	Will tank be replaced underground? Yes No	Will tank be replaced underground? Yes No	Will tank be replaced underground? Yes No

. Consultant / Contractor: ~~DES / Franklin Environmental, Inc.~~ IFCI Certification : _____

. Local Fire Dept. Notified Hillsboro Fire Dept.

. Inspector R. Wickson Date December 22 & 26, 2001

. Field Screening Methods (tank and piping):

Photo Ionization Detector - Headspace Sampling Technique

Sample Information

tank # N/A	tank #	tank #	tank #	tank #
Soil 3 Water N/A	Soil Water	Soil Water	Soil Water	Soil Water

Taken By: R. Wickson

. Tank Condition:

tank # N/A	tank #	tank #	tank #	tank #
Pitting/Hole				

Indicate tank and sample locations by sketching on back of this report. See Attachment II

Include photographs of the excavation and tank(s) condition if avaliable. See Attachment III

Estimated cubic yards of stock piled contaminated soil: N/A cubic yards

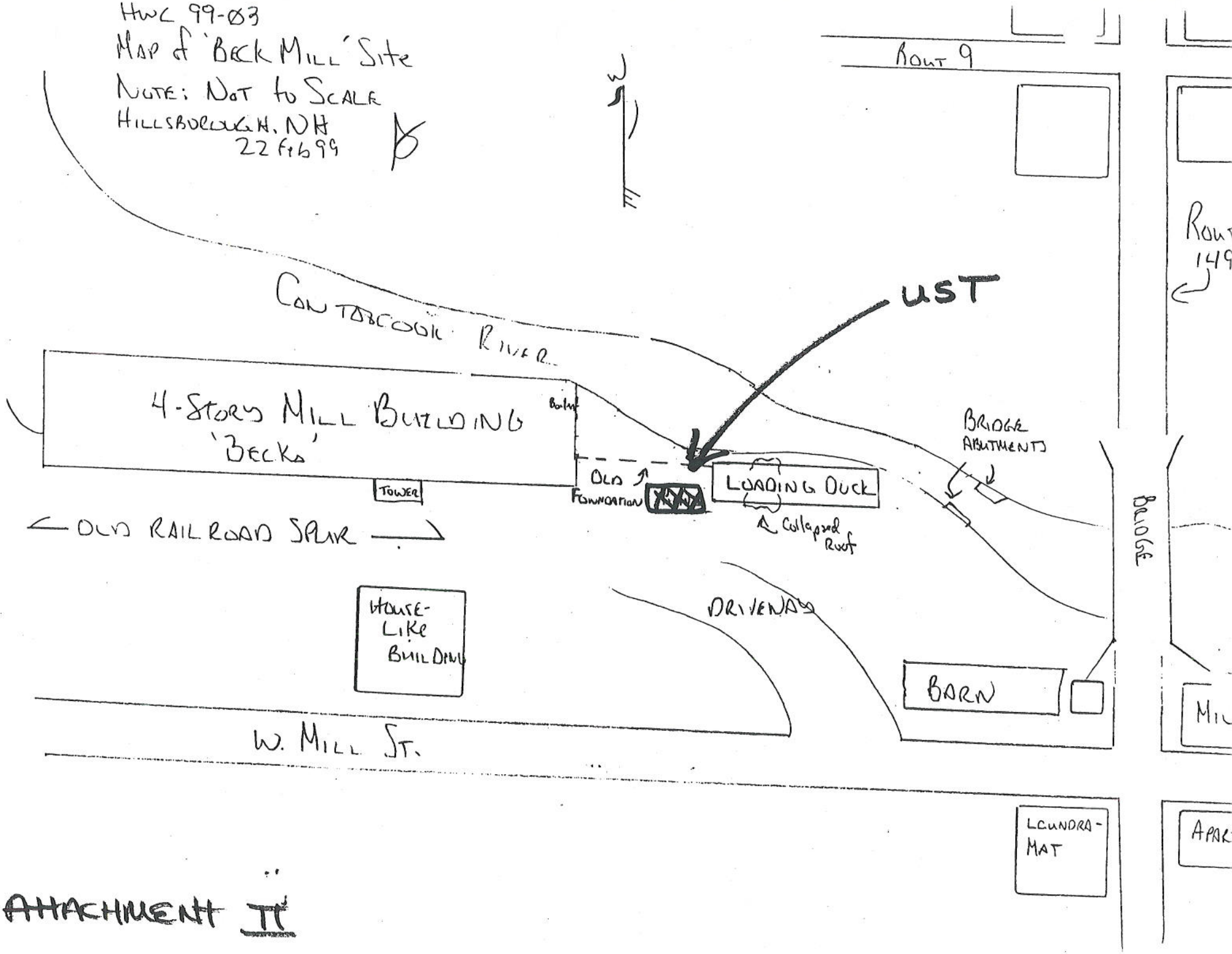
. Verification

I have inspected the site of the removed tank(s), including the entire excavation area. I am knowledgable in field observation techniques to determine regulated substance contamination in soils and groundwater. There is no evidence of soil or groundwater contamination at the site. I have also inspected the excavated tank(s) and found no evidence of leakage.

ne: Wickson Signature: Ralph Wickson Date: 1/31/01

Tank Closure Guidelines can be found at web site: www.state.nh.us/des/arch

HWC 99-03
Map of 'Beck Mill' Site
Note: Not to Scale
Hillsborough, NH
22 Feb 99



ATTACHMENT II

Hillsboro — 19990915
woods mill site

State of New Hampshire
Department of Environmental Services
6 Hazen Drive • PO Box 95 • Concord, NH 03302-0095
(603) 271-3445/3446

Results of Laboratory Analysis

S le #: A17779-1
Category: IN HOUSE
Matrix : Soil
Collection Date: 12/26/2000 13:00
Log in Date : 12/27/2000
Completion Date: 01/18/2001

Site : 19990915
Collectby : RALPH WICKSON
Locator : UST EXCAVATION COMPOSITE
Descript : Hazardous Waste
Account #: 05-06-05
Project #: 05-0029530

Analyte	Results	RDL	Analyte	Results	RDL
Dichlorodifluoromethane	BDL	280	Chloromethane	BDL	280
Vinyl chloride	BDL	280	Bromomethane	BDL	280
Chloroethane	BDL	112	Trichlorofluoromethane	BDL	112
Diethyl ether	BDL	112	Acetone	BDL	560
1,1-Dichloroethene	BDL	112	Methylene chloride	BDL	112
Carbon disulfide	BDL	112	Methyl-t-butyl ether	BDL	112
trans-1,2-Dichloroethene	BDL	112	1,1-Dichloroethane	BDL	112
2-Butanone	BDL	560	2,2-Dichloropropane	BDL	112
cis-1,2-Dichloroethene	BDL	112	Chloroform	BDL	112
Bromochloromethane	BDL	112	Tetrahydrofuran(THF)	BDL	560
1,1,1-Trichloroethane	BDL	112	1,1-Dichloropropene	BDL	112
Carbon tetrachloride	BDL	112	1,2-Dichloroethane	BDL	112
Benzene	BDL	112	Trichloroethene	BDL	112
1,2-Dichloropropane	BDL	112	Dichlorobromomethane	BDL	112
Dibromomethane	BDL	112	4-Methyl-2-pentanone	BDL	560
cis-1,3-Dichloropropene	BDL	112	Toluene	BDL	112
trans-1,3-Dichloropropene	BDL	112	1,1,2-Trichloroethane	BDL	112
2-Hexanone	BDL	1120	1,3-Dichloropropane	BDL	112
Tetrachloroethene	BDL	112	Dibromochloromethane	BDL	112
Ethylene dibromide	BDL	112	Chlorobenzene	BDL	112
1,1,1,2-Tetrachloroethane	BDL	112	Ethylbenzene	BDL	112
m/p-Xylenes	BDL	112	o-Xylene	BDL	112
Styrene	BDL	112	Bromoform	BDL	112
Isopropylbenzene	BDL	112	1,1,2,2-Tetrachloroethane	BDL	112
1,2,3-Trichloropropane	BDL	112	n-Propylbenzene	BDL	112
Bromobenzene	BDL	112	1,3,5-Trimethylbenzene	BDL	112
2-Chlorotoluene	BDL	112	p-Chlorotoluene	BDL	112
tert-Butylbenzene	BDL	112	1,2,4-Trimethylbenzene	BDL	112
sec-Butylbenzene	BDL	112	p-Isopropyltoluene	BDL	112
1,3-Dichlorobenzene	BDL	112	1,4-Dichlorobenzene	BDL	112
n-Butylbenzene	BDL	112	1,2-Dichlorobenzene	BDL	112
1,2-Dibromo-3-chloropropane	BDL	112	1,2,4-Trichlorobenzene	BDL	112
Hexachlorobutadiene	BDL	112	Naphthalene	BDL	280
1,2,3-Trichlorobenzene	BDL	112			

EPA Method : SW-8260 Units: ug/kg

Client's Comments: WOODS MILL SITE

Analyst Comments: Results reported on a dry wt basis. % solids = 90 %.

Measure date: 28-DEC-00

Authorized Signature:

mg/L = milligrams per Liter
< = Less Than
pCi/L = pico Curies per Liter
RDL=Reporting Detection Limit

ug/L = micrograms per Liter
BDL = Below Detection Limit
mg/kg = milligrams per Kilogram
MCL=Maximum Contaminent Level

> = Greater Than
ug/kg = micrograms per Kilogram
P-A = Present/Absent
J =Approximate Level

19990901 Hillsboro

State of New Hampshire
Department of Environmental Services
6 Hazen Drive • PO Box 95 • Concord, NH 03302-0095
(603) 271-3445/3446

NHDES

Results of Laboratory Analysis

Sample #: A17779-2
Category: IN HOUSE
Matrix : Soil
Collection Date: 12/26/2000 13:00
Log in Date : 12/27/2000 09:29
Completion Date: 01/18/2001

Locator : UST EXCAVATION COMPOSITE
Descript: Hazardous Waste
Site : 19990915
Collectby : RALPH WICKSON
Account #: 05-06-05
Project #: 05-0029530

Analyte	Results	Units	RDL	EPA Method
2-Methylnaphthalene	ND	ug/kg Dry	270	
Acenaphthene	ND	ug/kg Dry	270	
Acenaphthylene	ND	ug/kg Dry	270	
Anthracene	ND	ug/kg Dry	270	
Benzo(a)anthracene	ND	ug/kg Dry	270	
Benzo(a)pyrene	ND	ug/kg Dry	270	
Benzo(b)fluoranthene	ND	ug/kg Dry	270	
Benzo(g,h,i)perylene	ND	ug/kg Dry	270	
Benzo(k)fluoranthene	ND	ug/kg Dry	270	
Chrysene	ND	ug/kg Dry	270	
Dibenz(a,h)anthracene	ND	ug/kg Dry	270	
Fluoranthene	ND	ug/kg Dry	270	
Fluorene	ND	ug/kg Dry	270	
Indeno(1,2,3-cd)pyrene	ND	ug/kg Dry	270	
Naphthalene	ND	ug/kg Dry	270	
Phenanthrene	ND	ug/kg Dry	270	
Pyrene	ND	ug/kg Dry	270	

Client's Comments: WOODS MILL SITE

Analyst Comments: ANALYSIS BY AMRO ENVIRONMENTAL LABORATORIES CORP; #0012289

Report Comments: METHOD: SW8270C. RESULTS AS DRY WEIGHT, 8.8% MOISTURE.

Measure date: 04-JAN-01

Authorized Signature: Valerie Briggs

mg/L = milligrams per Liter
< = Less Than
pCi/L = pico Curies per Liter
RDL = Reporting Detection Limit
ug/L = micrograms per Liter
BDL = Below Detection Limit
mg/kg = milligrams per Kilogram
> = Greater Than
ug/kg = micrograms per Kilogram
P-A = Present/Absent

State of New Hampshire
Department of Environmental Services
6 Hazen Drive • PO Box 95 • Concord, NH 03302-0095
(603) 271-3445/3446

Results of Laboratory Analysis

Sample #: A18712-1
Matrix : Soil
Client : IN HOUSE

Site :199900015
Locator :UST EXCAVATION COMPOSITE
Collectby :Ralph Wickson
Descript : WOODS MILL SITE

Collection Date: 12/26/2000 13:00
Completion Date: 02/08/2001

Log in Date: 01/23/2001 14:37

Analyte	Results	Units	Acceptable Level	EPA Method
TPH (Fuel)	3800	mg/kg Dry		Extraction

Client's Comments: sub'd to AMRO

Analyst Comments: ANALYSIS BY AMMRO ENVIRONMENTAL LAB CORP; #0101194-01A

Report Comments: METHOD:SW8015B. SAMPLE RUN 21 DAYS OVER HOLD TIME PER CLIENT RE

Measure date: 31-JAN-01

Authorized Signature:

mg/L = milligrams per Liter
ug/L = micrograms per Liter
> = Greater Than
< = Less Than
BDL = Below Detection Limit
ug/kg = micrograms per Kilogram
pCi/L = pico Curies per Liter
mg/kg = milligrams per Kilogram
P-A = Present/Absent
RDL = Reporting Detection Limit
MCL = Maximum Contaminent Level
CFU/100mL = Counts per 100 milliliters

ACM Sampling and Removal Action
(2000-2001)

MEMORANDUM

Date: October 23, 2000

From: Steve Cullinane, DES,ARD

To: Ralph Wickson, DES,WMD
John Regan, DES,WMD

Subject: Boiler Asbestos Samples, Woods Mill,Hillsboro

Ralph, John:

I have received verbal confirmation from the lab, that samples of suspect asbestos containing material collected from the two brick boilers are positive. The material is an insulating material that was extracted from behind the steel faceplates on both boilers. The material is 50% chrysotile asbestos, and is very friable. Based on my experience, I would expect to find a layer of this material behind the entire faceplate (10'x10'), most likely around the steel steam drums, and up high under the brick cap. Any brick and mortar that is in contact with this material would be difficult to clean, and therefore would also be treated as asbestos waste.

The rest of the samples are still being analyzed. I will forward the results when I get them.

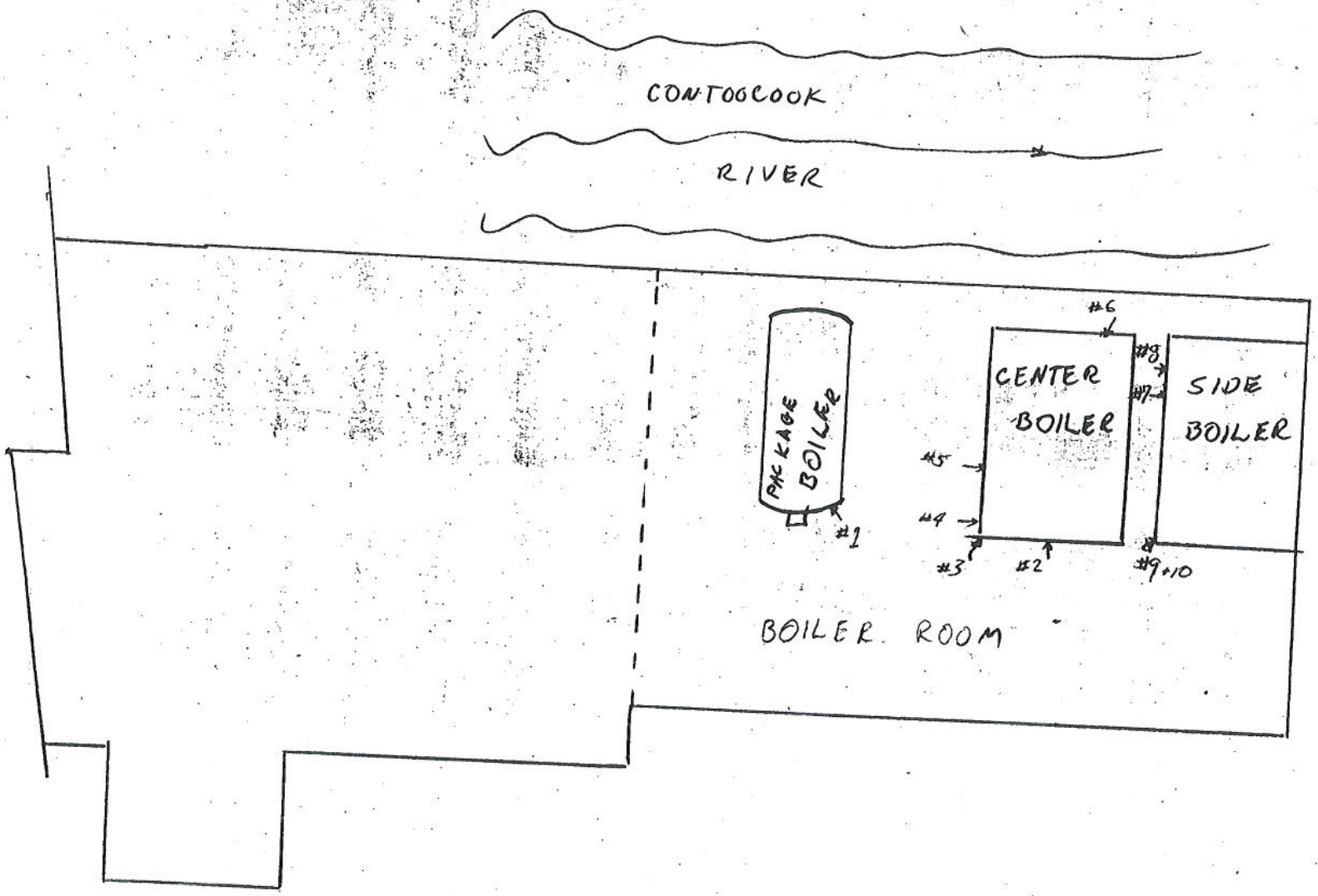
Received 28-Nov-0
WMD (from KRD)

Woods Woolen Mill, Hillsboro
Boiler Asbestos Sampling
October 16, 2000

Sample #	Description	% Asbestos	Notes
#1	Package Boiler Door Insulation	0	
#2	Center Boiler, Fire Brick	0	
#3	Center Boiler,Insulation Behind Steel Face	50	Chrysotile
#4	Center Boiler, Mortar between Brick layers, Left side.	0	
#5	Center Boiler, Mortar around sight glass hole, Left side.	0	
#6	Center Boiler,insulation from pipe hole, Back side	0	
#7	Side Boiler, inner packing around drum end.	0	
#8	Side Boiler,Fire Brick from rear of boiler	0	
#9	Side Boiler, Insulation Behind Steel Face	50	Chrysotile
#10	Side Boiler,Insulation in Brick sidewall,left side	0	

Date Sampled: October 16, 2000
Sampler: Steve Cullinane

Date Analyzed:
Analysis By: Scott LawsonGroup, Ltd.



WOODS MILL
HILLSBORO

The Sc t Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

NH DES Air Resources Division
6 Hazen Drive
Concord NH 03301

Report Date : October 24, 2000
SLGL Job # : 2051606
Date Sampled : 10/16/00
Date Received : October 16, 2000
Sampler : Steve Cullinane
Client Project : Wood Mills - Hillsboro

Analyte : PLM

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos %			Other Fibrous Material %				Non Fibrous Material
						Chrysotile	Amosite	Crocidolite	Fibrous Glass	Cellulose	Synthetic	Other	
152444	#10 - Side Boiler, Insulation Brick Side Wall	No	Yes	Yes	Brown, Black	----	----	----	70	1	----	----	29

TTP = Test Till Positive

This Polarized Light Microscopy report relates only to items tested. Client should not use the NVLAP to claim endorsement. PLM by visual area estimation can produce errors of 10%. Results near the 1% level can be more accurately quantified by the point count method or Transmission Electron Microscopy.

SLGL laboratory certifications apply only to samples analyzed in-house.

NVLAP Accreditation Number 101228
Analytical Methodology: 600/R-93/116 July 1993

Analyzed By: Carmel Bechard
for Ronald B. Sabin

Approved By: Ronald B. Sabin
for Jennifer Scott, Lab Manager

{Asb. Bulk}

The Scott Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

NH DES Air Resources Division
6 Hazen Drive
Concord NH 03301

Report Date : October 20, 2000
SLGL Job # : 2051606
Date Sampled : 10/16/00
Date Received : October 16, 2000
Sampler : Steve Cullinane
Client Project : Wood Mills - Hillsboro

Analyte : PLM

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos %			Other Fibrous Material %				Non Fil Mate
						Chrysotile	Amosite	Crocidolite	Fibrous Glass	Cellulose	Synthetic	Other	
152435	#1 - Package Boiler, Door Insulation	No	No	No	Brown, Black, Cream	----	----	----	----	----	----	----	10
152437	#3 - Center Boiler, Insulation	No	Yes	Yes	Gray, Black	50	----	----	----	----	----	----	5
152443	#9 - Side Boiler, Insulation Behind Steel Flue	No	Yes	Yes	Brown, Black, White	50	----	----	1	<1	----	----	>4

TTP = Test Till Positive

This Polarized Light Microscopy report relates only to items tested. Client should not use the NVLAP to claim endorsement. PLM by visual area estimation can produce errors of 10%. Results near the 1% level can be more accurately quantified by the point count method or Transmission Electron Microscopy.

SLGL laboratory certifications apply only to samples analyzed in-house.

NVLAP Accreditation Number 101228
Analytical Methodology: 600/R-93/116 July 1993

Analyzed By: Ernest M. Roche
for Ronald B. Sabin

Approved By: Ronald B. Sabin
for Jennifer Scott, Lab Manager

(Asb. Bulk)

The Scott Lawson Group, Ltd.
Environmental, Health & Safety Consultants
29 River Road, Suite 18
Bow, NH 03304
(800) 645-7674
FAX (603) 228-3871

Report Prepared For:

NH DES Air Resources Division
6 Hazen Drive
Concord NH 03301

Report Date : October 24, 2000
SLGL Job # : 2051606
Date Sampled : 10/16/00
Date Received : October 16, 2000
Sampler : Steve Cullinane
Client Project : Wood Mills - Hillsboro

Analyte : PLM

SLGL Lab#	Sample Description	Homogeneous	Obvious Layers	Fibrous	Color	Asbestos %			Other Fibrous Material %				Non Fib Materi
						Chrysotile	Amosite	Crocidolite	Fibrous Glass	Cellulose	Synthetic	Other	
152436	#2 - Center Boiler, Fire Brick	No	Yes	Yes	Tan, Cream, Brown	----	----	----	----	<1	----	----	>9
152438	#4 - Center Boiler, Masonry	No	Yes	No	Brown, Black	----	----	----	----	----	----	----	10
152439	#5 - Center Boiler, Masonry Layer	No	Yes	Yes	Cream, Brown, Tan	----	----	----	----	<1	----	----	>9
152440	#6 - Center Boiler, Insulation	No	No	Yes	Black, Red, Gray	----	----	----	----	<1	40	2	>5
152441	#7 - Side Boiler, Packing Insulation Around Drum	No	No	Yes	Brown, Gray	----	----	----	70	----	----	----	30
152442	#8 - Side Boiler, Fire Brick	No	Yes	No	Cream, Brown, Gray, Black	----	----	----	----	----	----	----	100

TTP = Test Till Positive

This Polarized Light Microscopy report relates only to items tested. Client should not use the NVLAP to claim endorsement. PLM by visual area estimation can produce errors of 10%. Results near the 1% level can be more accurately quantified by the point count method or Transmission Electron Microscopy.

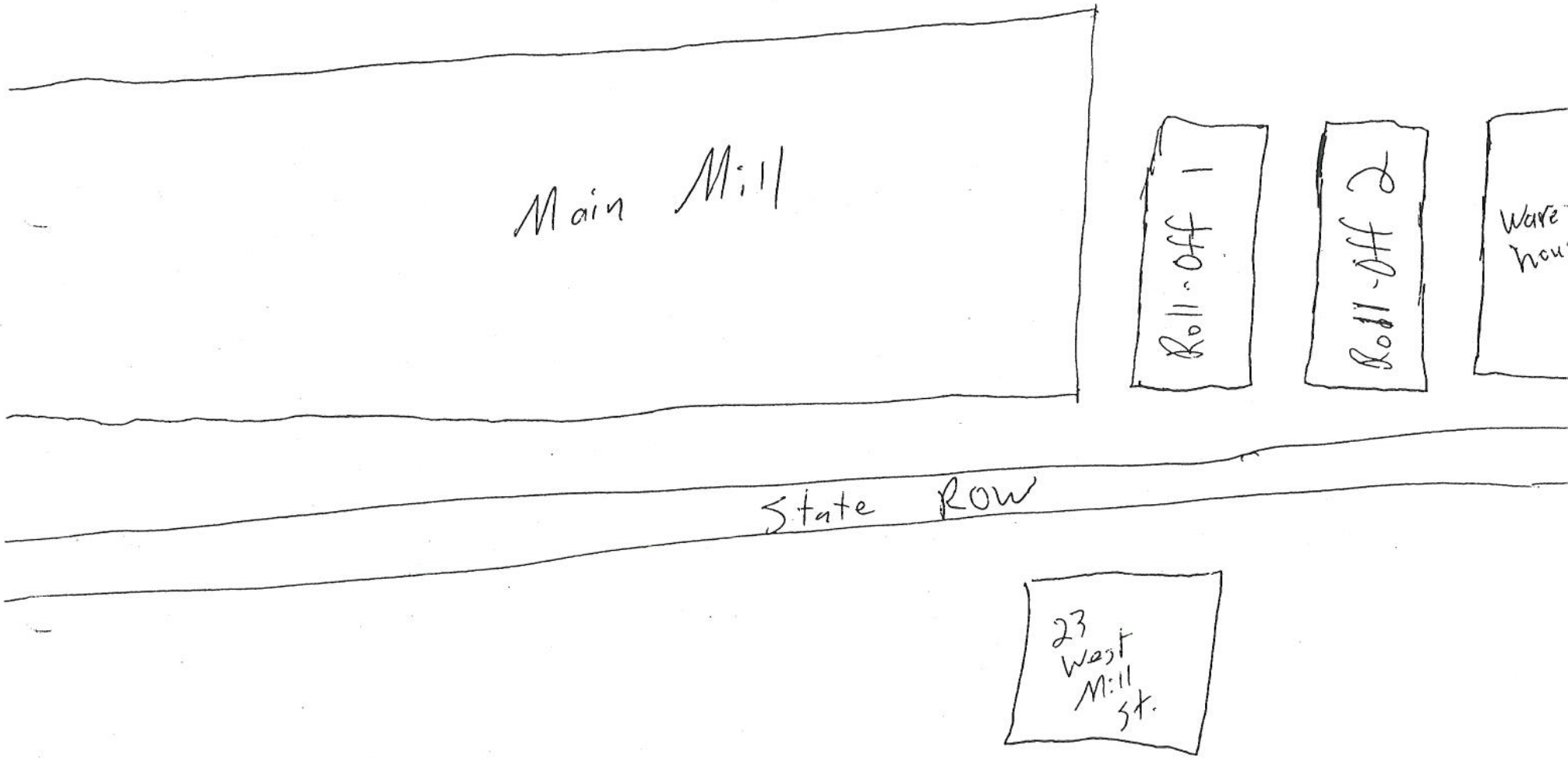
SLGL laboratory certifications apply only to samples analyzed in-house.

NVLAP Accreditation Number 101228
Analytical Methodology: 600/R-93/116 July 1993

Analyzed By: Carmel Dochard
FOR Ronald B. Sabin

Approved By: Ronald B. Sabin
for Jennifer Scott, Lab Manager

{Asb. Bulk}


Main Mill
Roll-off 1
Roll-off 2
Ware
hou
State Row
23
West
Mill
St.

State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES
6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-2900 FAX (603) 271-2456

August 11, 2000

Mr. Gary Lipson, On-Scene Coordinator
US EPA Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

SUBJECT: Woods Woolen Mill Asbestos Removal, Hillsborough, New Hampshire

Dear Mr. Lipson:

This letter is sent in response to your telephone conversation held on August 3, 2000 with Mr. Ralph Wickson of the New Hampshire Department of Environmental Services (Department) in regards to the Subject project. In regards to your inquiry as to whether or not the asbestos removed from the Woods Woolen Mill, located off West Mill Street in Hillsborough, New Hampshire, could be disposed of at the Town of Hillsborough's (Town) Landfill, located off Dump Road, the Department offers the following:

The Town's landfill can be used as a disposal location for the asbestos removed from the Woods Woolen Mill. It is the Department's understanding that Weston & Sampson, consultant on behalf of the Town, is preparing the necessary asbestos disposal plan. The plan must include the proposed location for disposal within the landfill footprint. Upon completion of the disposal, an as-built plan identifying the location of the asbestos is to be provided to the Department.

If there are any questions regarding this letter, or if you would like to arrange to meet with Department personnel, please contact me at (603) 271-2925.

Sincerely,

David J. Rousseau, Supervisor
Solid Waste Compliance Section

DJR/Woods Woolen Mill, Hillsborough
cc: Richard S. Reed, Administrator, NHDES SWMB
Ralph Wickson, NHDES
Steve Cullinane, NHDES, ARD
James Coffey, Business Administrator, Hillsborough
J. Hutchins, P.E., Weston & Sampson
Town of Hillsborough Solid Waste File/DB

RECEIVED
AUG 14 2000
DEPARTMENT OF
ENVIRONMENTAL SERVICES