

**Analysis of Brownfields Cleanup Alternatives (ABCA)
Phase 1 Site Cleanup Activities of the
Former W. W. Cross Site
39 Webster Street
Jaffrey, New Hampshire**

I. INTRODUCTION & BACKGROUND

In July 2024, the Town of Jaffrey (the Town) was awarded a Site-Specific Brownfields Cleanup Grant by the United States Environmental Protection Agency (EPA) for the former W.W. Cross property, located at 39 Webster Street in Jaffrey, New Hampshire (the Site). As outlined in the Town's EPA Brownfields Cleanup Grant application, the Site redevelopment is a critical component of the Town's downtown revitalization efforts, aimed at transforming it from a blight in the community into a key anchor for revitalization by providing access to affordable housing, local food markets, and community gathering space.

This Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared to meet a requirement of the Town's cleanup grant. The ABCA evaluates cleanup options for the Site, focusing on the first phase of an incremental approach to address hazardous building materials and contaminated soil and groundwater. Phase 1 will involve the abatement of hazardous building materials in the remaining portion of the former W.W. Cross manufacturing building. Remedial activities to address the contaminated soil beneath the building will occur in Phase 2, which will be detailed in a subsequent ABCA/Remedial Action Plan (RAP) prepared for the Site.

1. Site Location

The Site consists of an approximately 11.29-acre parcel located at 39 Webster Street in Jaffrey, New Hampshire (Parcel ID 245-7.2). The Site location is shown in Figure 1 – Locus Map. Significant Site features are shown in Figure 2 – Site Plan.

As shown in Figure 2, the Site is in an area of mixed use. To the south and west, there are primarily residential properties along with a few commercial businesses, an American Legion Hall, and a ballfield. A former railroad right-of-way and commercial development border the Site to the north. Undeveloped land, which includes a former surface impoundment/lagoon related to historic Site operations lies to the east. The eastern portion of the Site also contains a waste tack pile landfill and two retention ponds separated by an earthen berm.

The Town's cleanup grant will be used to facilitate the remediation and redevelopment of the former manufacturing area, located on the western portion of the Site. This area contains remains of an approximately 98,000-square-foot former manufacturing building, a paved parking lot, and various other features, including an aboveground storage tank (AST) building, several exterior transformers, and subsurface utilities. The Site is currently vacant. Access is restricted by a chain-link fence with a locked gate, and the windows and doors of the on-site buildings have been boarded up to impede unauthorized entry.

A plan illustrating the layout of the main manufacturing building is provided in Figure 3. According to previous reports, the building was constructed in the early 1920s and subsequently underwent several expansions from the 1930s to the 1970s. Its primary structure is steel-framed with exterior concrete block walls, although some sections are wood-framed. The building sits on a concrete slab slab-on-

grade foundation. The Site building features multiple flat roof systems that include several "saw tooth" skylights that illuminate portions of the former manufacturing areas.

As shown in Figure 3, the western and central portions of the Site building primarily consist of former warehouse, manufacturing, and office spaces. The southwest corner housed a former boiler and maintenance room, though the boilers have since been removed. Manufacturing operations ceased at the Site in 2000, after which the eastern side of the building was subdivided into several commercial tenant spaces, including a woodworking facility and a gym. A fire in 2020 severely damaged the eastern part of the building, prompting an EPA-led cleanup that involved the removal of some asbestos-containing materials (ACM) and partial demolition of the building structure.

The main manufacturing building is currently in a state of disrepair. The roof has suffered significant deterioration, with damaged or missing sections of roof decking, allowing rainwater to infiltrate the southern and western portions of the building. A section of the roof in the southeastern part of the building has also collapsed. The building is largely empty, aside from some debris and miscellaneous solid and universal wastes that are scattered throughout different areas.

2. Regional & Site Vulnerabilities

EPA requires that the ABCA consider potential impacts due to forecasted climate conditions. The Town is located in the Monadnock region of New Hampshire approximately 35 miles southwest of Concord, New Hampshire. The Town of Jaffrey contains several lakes, ponds, reservoirs, rivers, and streams. The Contoocook River originates in Contoocook Lake in southern Jaffrey and flows northeast through the center of the Town. The Town is located approximately 65 miles west of the Atlantic coast.

The northeastern United States, including Jaffrey, includes warm and often humid summers and cold winters. Rainfall can be severe with summer thunderstorms common and severe weather resulting from regional nor'easter anticyclone storms and/or hurricanes. Winter conditions can also be severe with ice storms and heavy snow. Snowfalls of 2-3 feet in one event are not uncommon. Portions of the Town of Jaffrey located near rivers/streams are within the 100-year flood plain. The portion of the Site associated with this ABCA is not located within a flood hazard area due to its location and elevation. However, the eastern portion of the Site, which includes two small retention ponds located east of the waste tack pile landfill, falls within a Zone X hazard area, where the risk of flooding is minimal.

According to the US Global Change Research Program website¹, because of climate change, the northeast region can expect increased temperatures and temperature variability and extreme precipitation events. The website states that *"Heat waves, coastal flooding, and river flooding will pose a growing challenge to the region's environmental, social, and economic systems. This will increase the vulnerability of the region's residents, especially its most disadvantaged populations. Infrastructure will be increasingly compromised by climate-related hazards, including sea level rise, coastal flooding, and intense precipitation events."*

Site vulnerabilities were assessed using the Federal Emergency Management Agency (FEMA) National Risk Index (NRI) tool², which combines data on 18 natural hazards, social vulnerability, and community resilience to evaluate baseline risk at a county level. According to the NRI, the overall risk from climate-related natural hazards at the Site is considered low, except for cold weather risks such as ice storms and cold waves. According to the Climate Mapping for Resilience and Adaptation tool³, other climate

¹ www.globalchange.gov

² <https://hazards.fema.gov/nri/>

³ <https://resilience.climate.gov/>

projections include an increase in extreme heat and annual precipitation, The proposed Site cleanup detailed in this ABCA is not expected to be impacted by forecasted climate change conditions or increase these risks. Conversely, the proposed Site cleanup is expected to improve Site resilience by addressing the current poor physical condition of the former manufacturing building, which is susceptible to further deterioration from severe storms, water intrusion, and seasonal freeze-thaw cycles.

3. Previous Site Use(s) and Any Previous Cleanup / Remediation

The Site was originally developed in 1915 as the W.W. Cross Factory, which manufactured tacks and fasteners for the upholstery, carpeting, and shoe industries. By 2000, W.W. Cross had ceased industrial operations and vacated the Site. The Site remained vacant until 2007-2008 when it was converted into several subdivided commercial tenant spaces. The Site building was used by various commercial businesses until 2012.

The former W.W. Cross manufacturing building has been vacant since 2012 and has subsequently fallen into a state of disrepair. In June 2020, a fire severely damaged the eastern portion of the building. In response, the EPA conducted cleanup activities between 2020 and 2022 to address potential impacts from the fire. The cleanup included removing an estimated 900 cubic feet (cf) of asbestos-containing fire debris, demolishing a fire-damaged portion of the building and installing a chain link fence to secure the Site.

As noted, the Town's cleanup funds will be used to address hazardous building materials, as well as contaminated soil and groundwater, from former manufacturing operations in the western portion of the Site. No additional cleanup will be conducted in the eastern portion of the Site, where the previous Site operator historically carried out response actions to address soil and groundwater contamination. These actions included the targeted removal of contaminated soil and the capping of the on-site waste tack pile landfill and the off-site lagoon on the adjacent eastern property. Reports documenting the historic response actions and ongoing monitoring for this area of the Site are publicly available through the New Hampshire Department of Environmental Services (NHDES) One-Stop Database using the Site/Interest ID (198708807)

<https://www4.des.state.nh.us/DESONestop/BasicSearch.aspx>

II. SITE ASSESSMENT FINDINGS

The Site is regulated by NHDES due to the historic release of oil and hazardous materials (OHM) to soil and groundwater. In general, soil and groundwater impacts in the former manufacturing portion of the Site coincide with the area below and around the former manufacturing building and to a lesser extent occurrence of historic fill. The primary contaminants of concern are metals (arsenic, cadmium, and lead) and polycyclic aromatic hydrocarbons (PAHs) in soil and chlorinated volatile organic compounds (CVOCs), 1,4-dioxane, dissolved metals, cyanide, and per- and polyfluoroalkyl substances (PFAS) in groundwater. On-Site buildings also contain various ACM, lead-based paint (LBP), and polychlorinated biphenyl (PCBs) containing materials.

Since 2017, various Site assessments have been performed to evaluate the nature and extent of contaminated materials associated with former manufacturing operations. The assessment findings are summarized below. Historic sampling locations are shown in Figure 2.

1. Phase I Environmental Site Assessment - 2017

A Phase I Environmental Site Assessment (ESA) was conducted by Ransom Consulting, Inc. (Ransom) in 2017. According to the Phase I report, the assessment identified several potential areas of concern. These areas were related to:

- An out-of-use 20,000-gallon No. 6 oil AST located in structure to the west side of the main Site building.
- The reported presence and use of a historic underground storage tank (UST).
- Presence of hazardous building materials in the former manufacturing building and AST structure as well as the presence of several pad-mounted transformers.
- The presence and former use of floor drains and sumps within the former manufacturing building for industrial wastewater disposal.
- The occurrence of off-Site properties associated with a known release of volatile organic compounds (VOCs) to groundwater.

The Phase I recommended conducting supplemental investigations to evaluate the areas of concern.

2. Hazardous Building Materials Inventory Survey

In 2017, Ransom conducted a hazardous building materials inventory (HBMI) for the Site. The HBMI identified ACM in the main manufacturing building, including roofing, flooring, and mastic, in several spaces and confirmed the presence of vermiculite insulation surrounding the on-Site AST. The investigation also identified LBP, PCB-containing building components, and various universal wastes inside the building. Where detected, concentrations of PCBs in building materials were below the EPA's regulatory standards for PCB bulk product waste as specified in 40 CFR 761.

In addition to the building survey, Ransom's 2017 investigation included collecting soil samples around the perimeter of the former manufacturing building to assess surficial soil impacts from LBP. The sampling identified several locations where the lead concentrations in surficial soil (i.e., 0 to 2-inches below ground surface) exceeded the NHDES Soil Remediation Standards (SRS).

3. Phase II ESA Activities (pre-EPA Removal Action)

Based on the Phase I and HBMI findings, a Phase II and supplemental Phase II Environmental Site Assessment (ESA) were conducted at the Site. The investigations included drilling soil borings, installing groundwater monitoring wells, and collecting and analyzing soil, groundwater, and concrete floor slab samples from the former manufacturing building. Overall, the assessments identified PAHs, VOCs, petroleum hydrocarbons, and metals in the soil and VOCs, PAHs, Per- and polyfluoroalkyl substances (PFAS), cyanide, and dissolved metals in groundwater. Where detected, select PAHs and metals (cadmium and arsenic) in soil exceeded the NHDES SRS, while two VOCs, tetrachloroethylene (PCE) and naphthalene, and cyanide exceeded Ambient Groundwater Quality Standards (AGQS). Low concentrations of metals and PCBs were also detected in the concrete floor slab.

Based on the Phase II results, the contamination in the former manufacturing portion of the Site was primarily attributed to former Site operations, specifically the discharge of liquid wastes to floor drains and sumps in the former plating and wastewater treatment area. Outside the building, the Phase II also identified a suspect creosote-type material that coincided with elevated PAH concentrations in shallow soil near the southwest corner of the building. Some other PAH impacts to soil were also detected in soil near the AST structure.

4. Phase II ESA Activities (post-EPA Removal Action)

In 2023, additional Phase II investigations were conducted by Credere Associates, LLC. (Credere) to inform cleanup decisions and evaluate Site conditions following EPA's cleanup activities, which are described in more detail in the section above - *Previous Site Use(s) and Any Previous Cleanup / Remediation*. The investigation involved drilling more soil borings, installing new groundwater monitoring wells, and collecting and analyzing additional soil, groundwater, and hazardous building materials samples. It also included investigating a suspected UST below the building.

The 2023 Phase II investigation results were consistent with previous findings. The investigation identified contaminants such as CVOCs, 1,4-dioxane, PFAS, cadmium, cyanide, PAHs, and the creosote-type material in the soil and/or groundwater. No UST was identified. The presence of HBM within the remaining part of the former manufacturing building was also confirmed.

In November 2023, a supplemental Phase II ESA was conducted to assess the extent of the PAH impacts to soil in the area adjacent to the southwest corner of the building, and to confirm the presence of elevated concentrations of cadmium, cyanide, and VOCs in groundwater beneath the former plating room. The results identified additional locations with soil containing PAH concentrations above the SRS; however, where detected, the impacts were mostly related to fill material containing pieces of asphalt rather than creosote-type material. Groundwater samples also confirmed the presence of dissolved cadmium, cyanide, and VOCs in the groundwater below the plating and wastewater treatment area.

III. PROJECT GOAL

Based on the Site assessment activities conducted to date, remediation is required for the soil beneath the former plating and wastewater treatment areas of the on-site building, as well as for shallow soil around the suspected creosote-type materials to the southwest. Performing soil remediation in these areas requires access below the current building footprint. As such, Phase 1 of the Site cleanup involves abatement of hazardous building materials to facilitate access to these areas. Additionally, hazardous building material abatement will also address public safety concerns and abate the potential release of hazardous substances from the dilapidated structure.

The overarching goal for the Site cleanup and redevelopment is to promote the revitalization of downtown Jaffrey. The Town has hosted several community forums, workshops, and public meetings to share information, gather input, and help the community develop a shared vision for the Site. Based on the community engagement conducted to date, the proposed redevelopment is expected to include a mix of commercial and/or residential spaces. This redevelopment will significantly enhance the quality of life in the Town by providing employment opportunities, affordable housing, community gathering spaces, and access to local food markets.

IV. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

1. Cleanup Oversight Responsibility

The Town of Jaffrey, as the current property owner, will be responsible for implementation of the proposed cleanup activities. The cleanup will be overseen by NHDES. Abatement and monitoring of hazardous building materials will be conducted using certified and licensed personnel.

2. Cleanup Standards

The scope of work for this ABCA includes the abatement and proper disposal of hazardous building materials, including six (6) exterior electrical transformers, an out-of-service 20,000-gallon No. 6 fuel oil

AST, and miscellaneous universal wastes located within the former manufacturing building. This work will be carried out in accordance with applicable NHDES rules and regulations, as further described below.

3. Laws and Regulations

The Phase 1 Site cleanup will be performed according to the following regulations:

- ACM abatement – Chapter Env-A 1800
- LBP and PCB-containing material removal – Env-Hw 400
- Disposal of universal wastes – Env-Hw 1100
- Removal of the out-of-service 20,000-gallon No. 6 fuel oil AST – Env-Hw 300
- Removal of the exterior transformers – Env-Hw 400.

Additional applicable local, state and federal regulatory requirements will also be adhered to, including but not limited to, the Federal Small Business Liability Release and Brownfields Revitalization Act, the Federal Davis-Bacon Act, the Bipartisan Infrastructure Law (BIL) and the Build America Buy America (BABA) Act, as well as town by-laws. Required pre-work notifications for asbestos abatement and other permits will also be completed.

V. EVALUATION OF CLEANUP ALTERNATIVES

1. Cleanup Up Alternatives Considered

EPA requires that this ABCA evaluate three (3) remedial alternatives for the proposed Site cleanup. As noted, Phase 1 will address hazardous building materials to address immediate public safety concerns regarding the current condition of the building and to facilitate future remediation of contaminated soil below the on-Site building during Phase 2 of the Site cleanup. The following three (3) alternatives were considered:

- Alternative #1: No Action
- Alternative #2: Hazardous Building Material Abatement and Building Renovation - Abatement of hazardous building materials, selective demolition of non-structural interior building finishes, demolition of accessory site structures, removal of transformers and out-of-service AST, and temporary containment to protect structure to remain would be performed for the structurally sound portion of the existing building. The structurally unsafe portion of the building including the roof would be demolished. Building foundation and steel structure to remain.
- Alternative #3: Hazardous Building Material Abatement and Building Demolition – Complete abatement of all hazardous building materials, complete demolition of all aboveground structures on-site, and removal of the electrical transformers and out-of-service AST. Building foundation to remain.

2. Cost Estimate of Cleanup Up Alternatives

To satisfy EPA requirements, the effectiveness, implement ability, and cost of each alternative was considered prior to selecting a recommended cleanup alternative.

Effectiveness

- Alternative #1: The "No Action" alternative is ineffective in achieving the Phase 1 cleanup goals and supporting Site redevelopment. It fails to prevent potential exposure to hazardous materials currently located within the Site buildings, does not facilitate future soil remediation planned for Phase 2, and does not address the Town's priority of ensuring public safety given the current condition of the building.
- Alternative #2: This alternative is effective for addressing hazardous building materials, which would be removed and properly disposed of off-site. By eliminating the presence of hazardous materials, it would mitigate potential threats of release into the environment. Structural repairs and replacement of the existing roof system would also address immediate public safety concerns due to the building's poor physical condition. However, retaining the building in place would interfere with planned soil remediation efforts for the contaminated soil beneath it, requiring additional engineering solutions such as shoring and structural support during Phase 2 cleanup. Despite these challenges, this alternative offers some long-term sustainability by supporting the productive reuse of the Site, allowing the structure to be improved as part of redevelopment to address climate change risk factors, and by addressing the current poor physical condition of the former manufacturing building, which is susceptible to further deterioration from severe storms and water intrusion.
- Alternative #3: This alternative is an effective option since it involves removing all the hazardous building materials from the Site. It also addresses concerns about the potential threat of release and public safety concerns about the condition of the current building. It will also enable access for planned Phase 2 remediation of impacted soils located below the building, and support and facilitate the productive reuse of the Site. The alternative offers long term sustainability and resiliency to climate change by removing the likelihood of contaminants mobilizing during future storm events and allowing for the rebuilding of a structure that is resilient to climate change risk factors including increases in extreme heat and annual precipitation.

Implementability

- Alternative #1: "No Action" is easy to implement, as no actions will be conducted.
- Alternative #2: This alternative is considered technically feasible; however, it would be difficult to implement. It will require additional engineering design and planning to secure the building superstructure prior to and during Phase 2 remedial work as well as until future redevelopment plans are finalized. Such stabilization work will be challenging given the poor condition of the building and widespread occurrence of ACM in roofing materials and flashing. Additionally, it may be difficult to protect the existing superstructure while demolition of the non-structural finishes is completed.

This alternative requires implementing engineering controls (e.g., dust suppression and monitoring) during cleanup and demolition activities. It will cause a short-term disturbance to the community (e.g., trucks transporting waste). For these reasons, this alternative is considered the most difficult to implement with the highest impact (truck traffic) to the surrounding neighborhood.

- Alternative #3: This alternative is a viable remedial option. Like Alternative #2, it requires maintaining engineering controls (e.g., dust suppression and monitoring) during cleanup and demolition activities, resulting in short-term disturbances to the community. However, the overall duration of these controls and disturbances would be shorter for this alternative, as it does not require the additional effort to reinforce the existing building. Instead, areas in poor physical condition such as the roof would be demolished with hazardous materials in place and bulk-loaded for off-site disposal—a more costly but faster approach to achieving the Phase 1 cleanup goals. For these reasons, this alternative is considered less challenging and less disruptive to the surrounding area compared to Alternative #2. Furthermore, with the building fully removed, future soil remediation activities during Phase 2 of the site cleanup would be easier to implement

Cost

- Alternative #1: There are no costs associated with this alternative; however, the Site is not viable for redevelopment until hazardous building materials are abated and contaminated soil below the building are completed.
- Alternative #2: The cost to complete this alternative is estimated to be approximately \$1,910,000 – \$2,740,000. Added costs associated with this alternative are primarily driven by structural repairs/shoring needed to maintain the building. The estimate does not include the additional costs to maintain or support the building to remediate contaminated soil below the building during the subsequent Phase 2 remedial work.
- Alternative #3: The cost to complete this alternative is estimated to be approximately \$950,000 - \$1,285,000. The primary factors affecting the cost for this alternative are related to the handling and disposal of a larger quantity of demolition debris and the assumed bulk loading of hazardous materials. This alternative would not result in additional costs for the subsequent Phase 2 remedial work.

3. Recommended Cleanup Up Alternatives

The recommended cleanup alternative for Phase 1 of the Site cleanup is Alternative #3: Abatement and Demolition. Alternative #1: No Action, is not recommended because it would not meet the overall Project goals. Alternative #2: Abatement and Renovation, while effective at remediating hazardous building materials, comes at an implementation cost over twice as much as Alternative #3. While Alternative #2 generates slightly less waste than Alternative #3 by keeping the remaining superstructure, the Town would be unable to redevelop the Site for their desired purpose until soil remediation is also completed. As noted above, Alternative #2 would make this subsequent soil remediation work more difficult and costly.

Based on our cleanup alternatives analysis, Alternative #3: Abatement and Demolition is the most cost-effective option capable of reducing risk and supporting the Town's redevelopment goals. For these reasons, the recommended cleanup alternative is Alternative #3: Abatement and Demolition.

4. Green and Sustainable Remediation Measures for Selected Alternative

To make the selected alternative greener, or more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. The Town plans to require the cleanup contractor to follow an idle-reduction policy and will encourage the of use heavy equipment

with advanced emissions controls operated on ultra-low sulfur diesel and/or fuel-efficient / alternative fuel vehicles and equipment. In addition, and in accordance with the EPA's Principles for Greener Cleanups, the Contractor is encouraged to clean and salvage/reuse/recycle demolition debris and building contents as much as possible.

Other potential measures that will be implemented where applicable, beneficial, or feasible to improve the overall sustainability of the project include:

- Protecting and conserving water.
- Carpooling for Site visits and on-site project meetings.
- Scheduling activities efficiently so as to minimize travel to and from the Site.
- Maximizing efficiency in the transportation and disposal of impacted materials off-Site.
- Submitting documents in digital format, rather than hard copy, unless otherwise required by EPA, the Town and/or others, in an effort to save paper and resources.
- Optimizing the use of electronic and centralized communications for all project related correspondence and outreach to the local community, when feasible.

During outreach events, Jaffrey community members emphasized the importance of preserving the historical character of downtown while also incorporating environmental sustainability into the future Site redevelopment. To honor the history of the W. W. Cross factory, elements such as sawtooth skylights will be considered during design of future buildings. Reuse will also consider ways to utilize energy efficient and renewable energy alternatives as well as green stormwater infrastructure to minimize developmental impacts on the natural environment.

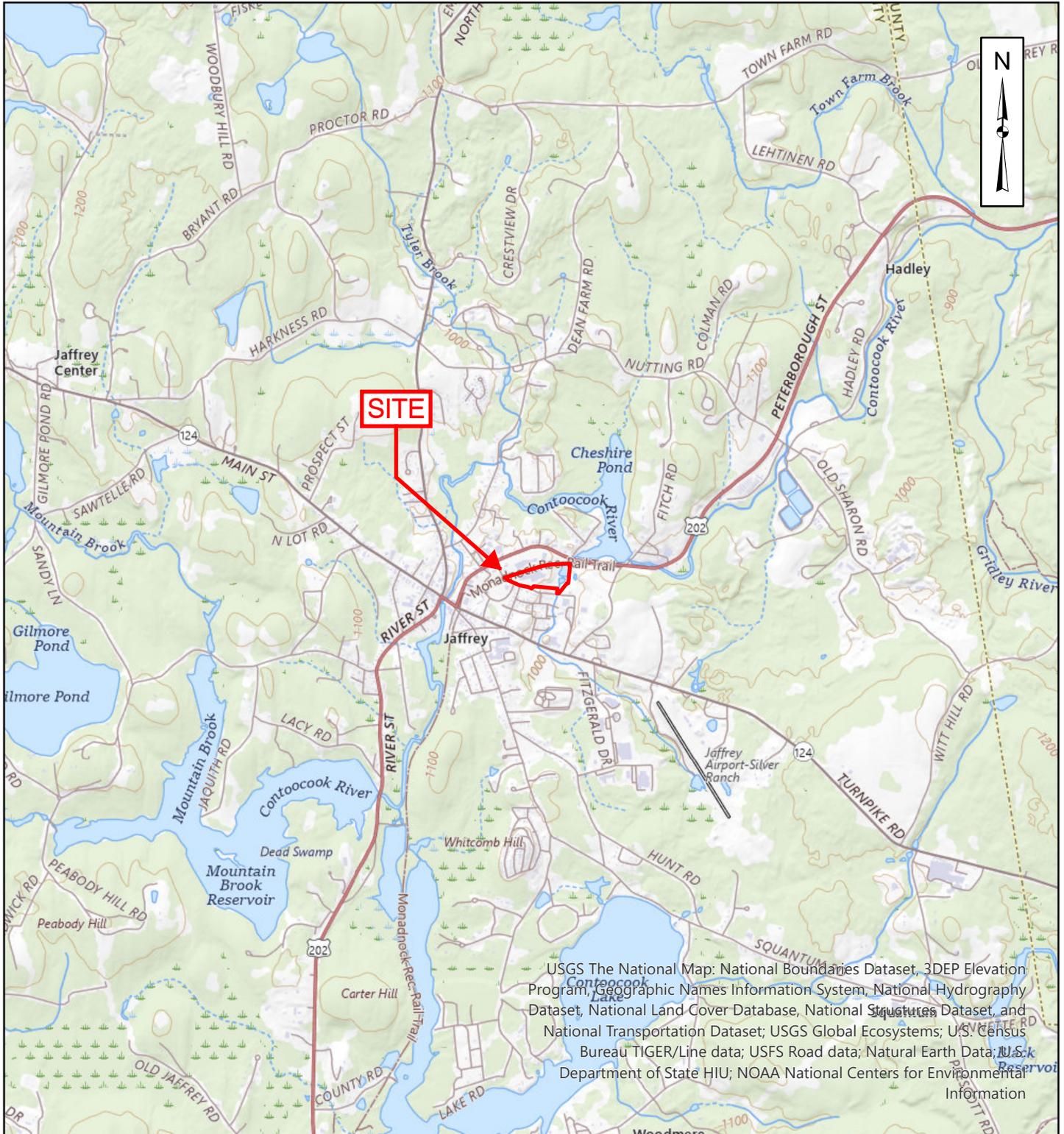
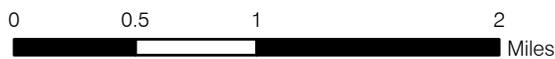
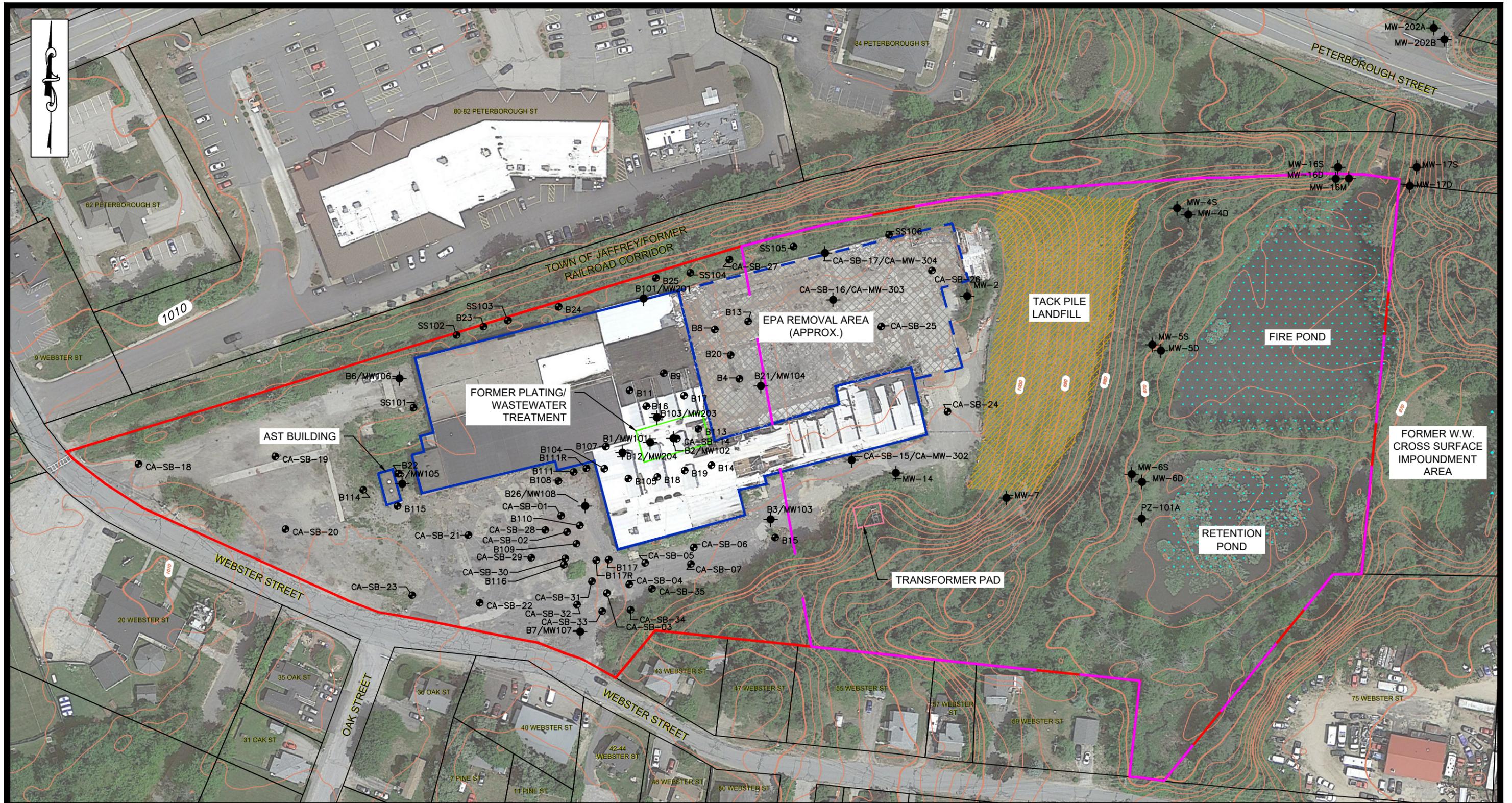


FIGURE 1
 W.W. CROSS SITE
 39 WEBSTER STREET
 JAFFREY, NEW HAMPSHIRE

LOCUS MAP





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LEGEND:

SITE BOUNDARY	TACK PILE
PARCEL BOUNDARY	WATER BODIES
SITE BUILDING FOOTPRINT	2-FT CONTOURS
FORMER BUILDING FOOTPRINT	TRANSFORMER PAD
ENVIRONMENTAL SOIL BORINGS (SB) LOCATIONS	
ENVIRONMENTAL MONITORING WELL (MW) LOCATIONS	
GROUNDWATER MANAGEMENT ZONE (GMZ) BOUNDARY	
FORMER PLATING AND WASTEWATER TREATMENT AREA	

FIGURE 2
39 WEBSTER STREET
JAFFREY, NEW HAMPSHIRE
SITE PLAN
 SCALE: 1"=100'

Weston & Sampson

NOTES:

- EXISTING CONDITIONS AND FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE AND ARE BASED ON INFORMATION OBTAINED FROM PREVIOUS INVESTIGATION PERFORMED BY OTHERS FROM 2019 TO 2024.

TOWN OF JAFFREY/FORMER RAILROAD CORRIDOR

AREA REMOVED AS PART OF EPA REMOVAL ACTIONS

WASTEWATER TREATMENT

PLATING ROOM

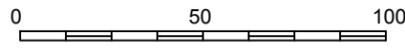
BOILER ROOM

AST BUILDING

TRANSFORMER PAD

- LEGEND:**
- SITE BOUNDARY
 - BUILDING ROOMS
 - SITE BUILDING FOOTPRINT
 - FORMER BUILDING FOOTPRINT
 - Ⓢ ROOM NUMBER

FIGURE 3
39 WEBSTER STREET
JAFFREY, NEW HAMPSHIRE
BUILDING LAYOUT PLAN
SCALE: 1"=50'



Weston & Sampson

NOTES:

1. EXISTING CONDITIONS AND FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE AND ARE BASED ON INFORMATION OBTAINED FROM PREVIOUS INVESTIGATION PERFORMED BY OTHERS FROM 2019 TO 2024.

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