



January 27, 2022
File No. 030151.030

Anthony F. Drouin, Administrator
Residuals Management Section - Wastewater Engineering Bureau
New Hampshire Department of Environmental Services
29 Hazen Drive, P.O. Box 95
Concord, New Hampshire 03302-0095

**Re: Hopkinton Septage Lagoons
Response to Compliance Requirements**
491 East Penacook Road, Hopkinton, New Hampshire 03229
NHDES Site No. 198705021
NHDES Permit #SEF-00-001

Dear Mr. Drouin:

On behalf of the Town of Hopkinton (Town), Nobis Engineering, Inc. d/b/a Nobis Group® (Nobis) is providing the following response to compliance requirements established by the Department of Environmental Services (NHDES) for the Hopkinton Septage Lagoons (facility) in a letter dated December 13, 2021. The letter was issued following a field inspection by representatives of the Residuals Management Section (RMS) on August 6, 2021 as well as a subsequent facility inspection by representatives of the Wastewater Engineering and Dam Bureaus on October 6, 2021.

In a meeting held between the Town, Nobis, and NHDES representatives on January 13, 2022, the compliance issues identified during the NHDES inspections were reviewed and appropriate corrective actions were discussed to provide the Town with an overview of the needs to bring the facility into compliance with applicable regulatory criteria. Following is a summary of requirements outlined by NHDES and responses provided by Nobis and the Town.

- 1. In order to continue with the SEF Permit renewal application process for the continued operation of the facility, submit written responses and additional/revised information, to address the February 2021 NH DES comments letter to the Town (copy attached), on the submitted Septage Facility Permit Renewal Application, by January 14, 2022.*

Response: The Town is formally withdrawing the SEF Permit renewal application and will not be seeking future operational approval for the facility. Given the compliance issues identified and the associated cost and effort to address them, the Town will instead be pursuing closure of the septage lagoons in accordance with applicable regulations. The facility will be permanently closed as of January 31, 2022 and the Town will be coordinating with Nobis to plan for formal facility closure in the near future. Please note, as the facility is jointly utilized by the Towns of Hopkinton and Webster, coordination with Town of Webster will be necessary throughout the process and will require additional allowance of time for specific approvals. An update regarding



the schedule for planning and conducting the closure will be provided to NHDES by March 4, 2022.

2. *Confirm the setback distance from the SEF limits to the closest southerly property line. If the distance is less than 500 feet, as required by Env-Wq 1609.09(f), Table 1609-1, the Town shall submit either a written consent to this reduced distance, signed by the affected abutter; or, an "Application for Waiver from Septage Management Rules" for relief from Env-Wq 1616, by January 14, 2022.*

Response: Nobis has reviewed the applicable information for properties south of the septage facility and determined that the only property within the 500-foot setback is identified as Lot 12 on tax map 244. This property is owned by the Town of Hopkinton and is undeveloped except for a utility easement. The Town of Hopkinton will be providing written consent to this reduced distance.

3. *By January 31, 2022 submit a detailed, proposed Scope of Work for a qualified environmental consultant to: fully characterize the stockpiled/bermed residual solids located on the property, within and outside of the fenced SEF; and evaluate remedial alternatives to treat, remove, or contain the residual solids such that the remedial action meets the criteria of Env-Or 606.13, as applicable.*

Response: As discussed in the January 13, 2022 meeting, Nobis will prepare the requested Scope of Work in coordination with representatives of RMS and other applicable NHDES programs to assure characterization sampling and evaluation of appropriate remedial alternatives is completed in accordance with Env-Or 606.13 and other applicable regulations. We propose to submit the Scope of Work, inclusive of a Residuals Solids Sampling and Analysis Plan, by February 18, 2022.

4. *Continue groundwater, drinking water, and surface water monitoring and reporting, as required by the NHDES Groundwater Management Permit #GWP-198705021-H-006, as issued, renewed, and directed by the NH DES Hazardous Waste Remediation Bureau.*

Response: Nobis continues to conduct sampling and reporting in accordance with the expired Groundwater Management Permit in conjunction with additional requirements as may be required by NHDES, pending issuance of the renewed permit. Results of the November 2021 sampling round have been uploaded to OneStop, and the next sampling event is scheduled for April 2022.

With decision to formally close the septage lagoons, the Town and Nobis will coordinate with the NHDES Dam Bureau accordingly to provide any information necessary in the interim and assure schedule updates and other pertinent information are provided.



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We trust this information satisfies the needs of NHDES at this time. If you have any questions or comments regarding this submittal, please do not hesitate to call.

Sincerely yours,

Nobis Group®

Lori Cox, P.E.
Project Manager

Clarence "Tim" Andrews, P.G | Associate
Director of State & Municipal Services

c: Mr. Neal Cass, Town of Hopkinton
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