



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



**Thomas S. Burack, Commissioner**

June 3, 2016

**Sent Via Email and Regular Mail**

John Tippett, Chief Executive Officer  
Textiles Coated International, Inc.  
200 Bouchard Street  
Manchester, New Hampshire 03103

Re: PFOA Matters in Southern New Hampshire

Dear Mr. Tippett:

This letter is a follow up to your meeting with Assistant Commissioner Clark Freise, held on May 11, 2016, regarding environmental contamination, including but not necessarily limited to drinking water and groundwater contamination, near the former Textiles Coated International, Inc. (TCI) facility located at 105 Route 101A in Amherst, New Hampshire (the Facility). As you are aware, a number of private drinking water wells tested in recent weeks near that facility have been found to contain elevated levels of perfluorinated compounds (PFCs), in particular, perfluorooctanoic acid (PFOA). Several of these wells have shown levels of PFOA that are above the EPA Lifetime Health Advisory and New Hampshire's Ambient Groundwater Quality Standard of 0.07 ug/l (70 ppt). Based on the information available to date, the New Hampshire Department of Environmental Services (NHDES) has determined that TCI is potentially responsible for the cleanup of the Site, restoration of impacted groundwater and drinking water, other actions necessary to protect public health and the environment, and any costs NHDES incurs for investigating and addressing the sources and impacts of this contamination. Furthermore, NHDES has determined that TCI may be potentially responsible for contamination of groundwater used by one or more public water supply wells and, therefore, responsible for costs associated with treating or otherwise remediating such public water supplies.

At your meeting with Assistant Commissioner Freise, the discussion included a number of critical steps that need to be taken immediately to address the threats to public health and the environment posed by the PFC contamination. To begin identifying the full extent of the contamination, NHDES is initially sampling potentially contaminated wells within an approximate one-half mile radius of the Facility. To date, this sampling effort has detected impacts to private drinking water wells located both within and outside this one-half mile radius. Previous sampling detected impacts to public drinking water wells outside this radius but within the general vicinity. NHDES will continue to test within and outside of this radius until the full nature and extent of the contamination has been delineated. As an interim

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measure, NHDES is providing bottled water to all properties within the investigation area that are served by private wells having PFOA levels above 0.07 ug/l (70 parts per trillion).

At this time, we formally request that TCI commit to the following:

1. Bottled Water:
  - a. Provide bottled water to all properties designated or to be designated by NHDES, for such period as NHDES determines to be necessary. Such delivery shall be by means and methods approved in advance by NHDES.
  - b. Until such time as TCI has assumed full responsibility for Item 1.a., provide reimbursement to the State of New Hampshire for all costs incurred to date and to be incurred associated with the delivery of bottled water to designated properties.
  
2. Site Investigation, including Sampling and Analysis:
  - a. Promptly (within 15 days of receipt of this letter) submit a workscope for sampling and analysis of surficial soils at nearby locations where NHDES determines that an increased likelihood of exposure of sensitive populations to soil exists (e.g., schools, daycare centers, and playgrounds).
  - b. Within 30 days of receipt of this letter, submit a workscope for sampling and analysis of soils at nearby agricultural farms and fields to be designated by NHDES.
  - c. Retain the services of a qualified environmental consultant and submit a workplan for a full site investigation of the Facility and impacted off-site locations, including but not limited to potential impacts to public water supplies, surface waters and sediments, within 30 days of receipt of this letter for review and approval by NHDES prior to initiation of further work.
  - d. Immediately implement the workplan as approved by NHDES and submit the results and findings to NHDES within the timeframe established by the approved work plan.
  - e. Provide reimbursement to the State of New Hampshire for all costs associated with the sampling and analysis of wells, water supplies, surface waters, sediments or other media in the designated study area, including the State's contractors' costs.

- f. Provide reimbursement to the State of New Hampshire for all costs associated with sampling and analysis of soil, crops or other media in the designated study area, including the State's contractors' costs.
- g. Provide reimbursement to the State of New Hampshire for all costs associated with sampling, analysis, modeling and other activities associated with the investigation of air emissions associated with the facility.

3. Public Water Supply Extensions and Connections:

- a. Provide for the connection of all residences, businesses and other properties to be designated by NHDES to a public water supply determined by NHDES to be capable of delivering drinking water in compliance with all applicable standards and requirements. Such connections shall be installed as soon as is feasible, and shall be accomplished according to a work plan and schedule to be developed by a NH licensed professional engineer and to be submitted not later than August 1 2016, to NHDES for review and consideration for approval. This may most effectively be accomplished by TCI by providing all necessary funding directly to or otherwise working in collaboration with the affected public water system suppliers to ensure timely installation and connection of the designated properties.
- b. Obtain all necessary approvals and permits and pay all costs associated with connecting each designated property to the public water supply.

4. Private Water Supply Treatment:

For affected properties that are serviced by private drinking water wells, and are not designated by NHDES for connection to a public water supply, design, install, maintain, and periodically sample individual Point of Entry treatment systems (POEs). Such POEs may be necessary as either an interim measure (e.g., until public water supply extensions and connections are completed) or a long-term measure, or both.

5. Site Remediation:

- a. Develop a corrective action plan to remediate PFC contamination and submit to NHDES for review and approval within the timeframe established by NHDES.
- b. Implement the approved corrective action plan and submit a report to NHDES within the timeframe established by the approved corrective action plan.

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6. Provide reimbursement to the State of New Hampshire for all management and oversight costs associated with the investigation, remediation, community outreach, communications, and other actions necessary to protect public health and environment.

All reimbursements to the State of New Hampshire shall be due upon receipt of an invoice from the State of New Hampshire.

This letter does not include requests that may be made by the New Hampshire Division of Public Health Services such as support for health studies, blood testing and analysis, and health hot-line support services. Those requests, if any, will be addressed through separate correspondence.

NHDES may require or request additional response actions and other reimbursements and payments as NHDES collects new information about the scope and extent of PFC contamination. As in all matters of this kind, NHDES reserves the right to take whatever enforcement actions it deems appropriate with respect to the issues described herein including the imposition of administrative, civil, or criminal penalties or referral to the Office of the Attorney General.

I look forward to your prompt response and appreciate your cooperation in this matter. The staff of NHDES looks forward to working with you and your environmental consultant on all of the matters addressed in this letter.

Please feel free to contact either Clark Freise, Assistant Commissioner, [clark.freise@des.nh.gov](mailto:clark.freise@des.nh.gov), (603) 271-8806, or me at (603) 271-2958, [thomas.burack@des.nh.gov](mailto:thomas.burack@des.nh.gov) if you have any questions.

Sincerely,



Thomas S. Burack  
Commissioner

cc: Clark Freise, Assistant Commissioner, NHDES