



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

Thomas S. Burack, Commissioner



NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES  
DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION  
RCRA Corrective Action  
Environmental Indicator (EI) RCRIS code (CA750)  
Migration of Contaminated Groundwater Under Control



RDMS DocID 106594

Facility Name: Freudenberg-NOK General Partnership  
Facility Address: Route 104, Bristol, NH  
Facility EPA ID #: NHD 001084672  
DES Site #: 198706012

Freudenberg NOK  
NHD 001084672  
R-13  
# 106594

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

X	If yes - check here and continue with #2 below.
	If no - re-evaluate existing data

If data are not available, skip to #8 and enter "IN" (more information needed) status code.

2. Is groundwater known or reasonably suspected to be "contaminated"<sup>1</sup> above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

XX	If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
	If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

If unknown - skip to # 8 and enter "IN" status code.

Rationale and Reference

Groundwater exceeds Ambient Groundwater Quality Standards for VOCs (TCE, Cis-1,2-DCE, VC, 1,1-DCE and Toluene).  
See file # DES 198706012 for detail.

3. Has the migration of contaminated groundwater stabilized (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

X	If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination" <sup>2</sup> .
---	---

	If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination" <sup>2</sup> ) - skip to #8 and enter "NO" status code, after providing an explanation.
--	--

**Rationale and Reference(s):**

Groundwater migration is controlled with a groundwater extraction system that provides hydraulic containment.  
 See attached Groundwater Management Permit and the "Year 2007 Annual Report"  
 See file# DES 198706012 for detail.

4. Does "contaminated" groundwater discharge into surface water bodies?

	If yes - continue after identifying potentially affected surface water bodies.
X	If no - No - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that underwater "contamination" does not enter surface water bodies.

**Rationale and Reference(s):**

Significant surface water impacts have historically been observed in an unnamed tributary to the Baker River adjacent to the site. Additional groundwater extraction wells provide additional hydraulic containment. Year 2007 sampling has no site related VOCs detected in surface water. Surface water standards have not been violated since July 2002.  
 See file # DES 198706012 for detail.

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

	If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration <sup>3</sup> of <u>key</u> contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
	If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration <sup>3</sup> of <u>each</u> contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any

	contaminants discharging into surface water in concentrations <sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
--	--

Rationale and Reference(s):

6. Can the discharge of "contaminated" groundwater into surface water be shown to be "currently acceptable" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

	<p>If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR</p> <p>2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.</p>
	If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

7. Will groundwater monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

X	If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be
---	---

	migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."
	If no - enter "NO" status code in #8.

Rationale and Reference(s):

See file# DES 198406012 and Groundwater Management Permit GWP-198406012-B-003 for detail. This site monitors groundwater and surface water on a tri-annual basis. Discharges from the groundwater extraction system are a permitted NPDES discharge. This Permit has additional sampling and reporting requirements.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

X	Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.
	NO - Unacceptable migration of contaminated groundwater is observed or expected.

Note: The Department evaluates the effectiveness of the hydraulic containment system and to ensure that contaminated groundwater does not extend past the Groundwater Management Zone on an annual basis. This evaluation is in conjunction with the review of the Annual Report, which is a required submittal for the Groundwater Management Permit.

Completed by David Bowen Date 04/17/2008  
 (print) David Bowen  
 (title) Hydrogeologist

Supervisor Frank Battaglia Date 04/17/2008  
 (print) Kenneth Kettenring  
 (title) Hydrogeologist

REV'D BY  
 FRANK BATTAGLIA  
 Frank Battaglia  
 VOK 5/29/08

Documentation of Environmental Indicator Determination  
DES Site # 198706012  
April 17, 2008  
Page 5 of 5

Locations where References may be found:

NHDES Office  
29 Hazen Drive  
Concord, NH 03302

Electronic references are available to the public on the Department's Web page, in the One Stop Data Retrieval Section.

The link to the web page is: <http://www.des.state.nh.us/OneStop.htm>

Contact Information

Name: David C. Bowen, P.G.  
Tel: (603) 271-2800  
Fax: (603) 271-2181  
E-mail: [David.Bowen@des.nh.gov](mailto:David.Bowen@des.nh.gov)



The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

February 22, 2006

**PM - COPY**

Ms. Lynn Preston  
Freudenberg-NOK General Partnership  
450 Pleasant Street  
Bristol, NH 03222

**Subject: Bristol – Freudenberg-NOK General Partnership Site – 450 Pleasant Street,  
Groundwater Management Permit (DES #198706012)**

Dear Ms. Preston:

Please find enclosed Groundwater Management Permit Number GWP-198706012-B-003, approved by the Department of Environmental Services (Department). This permit is issued for a period of 5 years to monitor the effects of past discharges of volatile organic compounds and is a renewal of the permit which expired on December 20, 2005.

All annual monitoring summaries and all required sampling results must be submitted to the Groundwater Management Permits Coordinator at the address below. All correspondence shall contain a cover letter that clearly shows the Department identification number for the site (DES #198706012). Please note that upon issuance of this permit, it is only necessary to submit monitoring results to the "Groundwater Management Permits Coordinator" and not to my attention.

A requirement for financial assurance has been incorporated into Groundwater Management Permit GWP-198706012-B-003 as Special Condition #12. The Department requires that Corrective Action sites provide financial assurance in accordance with New Hampshire Code of Administrative Rules Env-Wm 707, Requirements for Existing Facilities, which references 40 CFR 265 with respect to the following.

(A) Requirement to Provide Financial Assurance. The mechanism used to demonstrate financial assurance must ensure that the necessary funds will be available to complete all remaining remedial tasks. The Permittee shall satisfy this requirement by providing one or more of the following mechanisms: (1) an irrevocable trust fund; (2) a surety bond guaranteeing performance; (3) a letter of credit; (4) an insurance policy for closure; or, (5) a corporate guarantee. Acceptable mechanisms are described in, and must be in accordance with, 40 CFR 265.143(a) – (f).

(B) Scope of Financial Assurance. The Permittee shall provide financial assurance for completion of all approved remedial tasks.

(C) Criteria for Financial Assurance. Financial assurance mechanisms provided by the Permittee shall satisfy the following criteria:

Ms. Lynn Preston  
Bristol - Freudenberg NOK  
DES #198706012  
Page 2

- (1) funds must be sufficient to cover the costs of remedial tasks required by the Permit and/or by the Department;
- (2) funds must be available to the Department to complete remedial tasks for which the financial assurance has been established. Financial assurance, if in the form of a Trust Fund, may be funded over a pay-in period as described in 51 FR 37854 (October 24, 1986);
- (3) financial assurance mechanisms shall be maintained in force until the Department determines that the financial assurance requirements are no longer necessary; and,
- (4) financial assurance mechanisms shall be legally valid, binding, in a form and amount acceptable to the Department, and enforceable under New Hampshire law.

(D) Submission of Cost Estimates. Within 30 days of the issuance date of this Permit, the Permittee shall submit to the Department a detailed written estimate of the cost for hiring a third party to perform the remaining remedial tasks and the financial assurance mechanism to complete these tasks. The estimate must include total costs, in current dollars, for remedial activities, which, when completed, qualifies for a Certificate of No Further Action. The financial assurance value shall be based on the Department approved estimate. The Permittee also shall:

- (1) provide a financial assurance mechanism that is continuous for the duration of the required remedial action and until released from these remedial activities by the Department;
- (2) each year, no later than the anniversary of the issuance date of the Permit, adjust the amount of financial assurance to reflect: (a) the completion of remedial tasks; (b) inflation; and, (c) any other factors that may bear on the cost of incomplete work that is required under this Permit until site closure is achieved and a Certificate of No Further Action is issued. The department approved adjusted financial assurance amount and a copy of the amended financial assurance mechanism shall be submitted with the annual report required by the Permit.
- (3) make adjustments to the remedial cost estimate and the amount of financial assurance based on a cost estimate that is reviewed and approved by the Department in advance of making the adjustment;

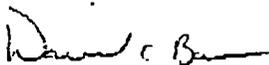
(E) Availability of Funds to the Department. If Freudenberg-NOK General Partnership fails to perform any required remedial activity or fails to maintain the required financial assurance mechanism, Freudenberg-NOK General Partnership must inform the Department in writing, within 30 days of discovery of the non-compliance. The

Ms. Lynn Preston  
Bristol - Freudenberg NOK  
DES #198706012  
Page 3

Department may also notify Freudenberg-NOK General Partnership in writing of any non-compliance that comes to its attention. Within 60 days of either notice, Freudenberg-NOK General Partnership must come into compliance with the required remedial and financial requirements or the financial assurance shall be made available to the Department by means of depositing the funds to an irrevocable trust fund. The Department may also send written notification that the remedial and financial requirements are not being performed and specify a schedule for Freudenberg-NOK General Partnership to achieve compliance, or place the funds into the irrevocable trust fund. Prior to drawing upon any financial assurance instrument, the Department shall notify the Permittee in writing of the alleged failure to perform and provide the Permittee with a reasonable period of not less than 30 days in which to remedy the alleged non-performance.

Should you have any questions, please contact me.

Sincerely,



David C. Bowen, P.G.  
Waste Management Division  
Tel: (603) 271-2800  
Fax: (603) 271-2181  
Email: [dbowen@des.state.nh.us](mailto:dbowen@des.state.nh.us)

Enclosure

cc: GZA GeoEnvironmental, Inc.  
Bristol Health Officer  
File

DES site #198706012



The  
NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES  
hereby issues  
GROUNDWATER MANAGEMENT PERMIT NO. GWP-198706012-B-003  
to the permittee  
FREUDENBERG – NOK GENERAL PARTNERSHIP  
to monitor the past discharge of  
Volatile Organic Compounds  
at  
FREUDENBERG – NOK GENERAL PARTNERSHIP SITE  
(450 Pleasant Street)  
in BRISTOL, N.H.  
via the groundwater monitoring system comprised of  
15 monitoring wells and 3 surface water sampling stations  
as depicted on the Site Plan entitled  
Site Plan/Locus Plan  
dated October 2005, prepared by GZA GeoEnvironmental, Inc.

TO: FREUDENBERG-NOK GENERAL PARTNERSHIP  
450 PLEASANT STREET  
BRISTOL, NEW HAMPSHIRE 03222

Date of Issuance: February 22, 2006  
Date of Expiration: February 21, 2011

Pursuant to authority in N.H. RSA 485-C:6-a, the New Hampshire Department of Environmental Services (Department), hereby grants this permit to monitor past discharges to the groundwater at the above described location for five years subject to the following conditions:

(continued)

STANDARD MANAGEMENT PERMIT CONDITIONS

1. The permittee shall not violate Ambient Groundwater Quality Standards adopted by the Department (N.H. Admin. Rules Env-Wm 1403) in groundwater outside the boundaries of the Groundwater Management Zone, as shown on the referenced site plan.
2. The permittee shall not cause groundwater degradation that results in a violation of surface water quality standards (N.H. Admin. Rules Env-Ws 1700) in any surface water body.
3. The permittee shall allow any authorized staff of the Department, or its agent, to enter the property covered by this permit for the purpose of collecting information, examining records, collecting samples, or undertaking other action associated with this permit.
4. The permittee shall apply for the renewal of this permit 90 days prior to its expiration date.
5. This permit is transferable only upon written request to, and approval of, the Department. Compliance with the existing permit shall be established prior to ownership transfer. Transfer requests shall include the name and address of the person to whom the permit transfer is requested, signature of the current and future permittee, and a summary of all monitoring results to date.
6. The Department reserves the right, under N.H. Admin. Rules Env-Wm 1403, to require additional hydrogeologic studies and/or remedial measures if the Department receives information indicating the need for such work.
7. The permittee shall maintain a water quality monitoring program and submit monitoring results to the Department's Groundwater Management Permits Coordinator no later than 45 days after sampling. Samples shall be taken from on-site monitoring wells and surface water sampling points as shown and labeled on the referenced site plan and other sampling points listed on the following table in accordance with the schedule outlined herein:

<u>Monitoring Locations</u>	<u>Sampling Frequency</u>	<u>Parameters</u>
<b>Upper Aquifer Wells:</b> MW-2S, PS-2S, MK-52S, PS-3DR, GZ-302, GZ-307U <b>Lower Aquifer Wells:</b> MW-4D, MW-5D, MW-8D, MW-10D, PS-1D, MK-37DR, MK-42D, PS-21D, GZ-308	April, July & November of each year	NHDES Petroleum & Hazardous Waste Remediation Full List of Analytes for Volatile Organics, Static Water Level Elevation
<b>Surface Water Stations:</b> S-1, SS-8, SS-200	Same as above	NHDES Petroleum & Hazardous Waste Remediation Full List of Analytes for Volatile Organics

Samples shall be obtained using sampling procedures and protocol described in "Practical Guide for Ground-Water Sampling," USEPA current edition, and "RCRA Ground-Water

Monitoring: Draft Technical Guidance," USEPA current edition. Samples shall be analyzed by a laboratory certified by the U.S. Environmental Protection Agency or the New Hampshire Department of Environmental Services.

Summaries of water quality shall be submitted annually to the Department's Waste Management Division, attention Groundwater Management Permits Coordinator, in the month of January, using a format acceptable to the Department. The Annual Report shall include a tabular summary of all monitoring results to date, an assessment of trends in the data, a groundwater contour map utilizing the most recent groundwater elevation data, an evaluation of the performance of the remedial action plan, and any recommendations for modifications to the remedial action plan.

The Annual Report shall be prepared and stamped by a professional engineer or professional geologist licensed in the State of New Hampshire.

8. Issuance of this permit is based on the Groundwater Management Permit Application dated October 14, 2005 and the historical documents found in the Department file DES #198706012. The Department may require additional hydrogeologic studies and/or remedial measures if invalid or inaccurate data are submitted.
9. Within 30 days of discovery of a violation of an ambient groundwater quality standard at or outside the Groundwater Management Zone boundary, the permittee shall notify the Department in writing. Within 60 days of discovery, the permittee shall submit a work scope for development of a revised remedial action plan, including a schedule of milestones, to the Department for approval. The Department shall approve the revised remedial action plan if compliance with Env-Wm 1403.08 has been demonstrated.

SPECIAL CONDITIONS FOR THIS PERMIT

10. Recorded property within the Groundwater Management Zone includes the lots as listed and described in the following table:

Tax Map/ Lot #	Property Address	Owner Name and Address	Deed Reference (Book/Page)
Bristol 225/2 Alexandria 418/161	450 Pleasant Street Bristol, NH	Freudenberg-NOK General Partnership 450 Pleasant Street Bristol, NH	1812/247-253

11. PERFORMANCE STANDARDS

The performance of the groundwater remediation system will be measured under the following conditions, which shall be considered as the Performance Standards for the remediation systems at the Freudenberg-NOK General Partnership site. A periodic assessment of the performance of the remediation systems shall be documented in the Annual Report (Condition No. 7 of this permit) and submitted to the Department each January. As described in the Remedial Action Plan (9/23/93) prepared by Pine & Swallow

-4-

Associates, Inc. (and subsequently approved by the Department on 10/18/93), the remedy for the groundwater contamination at the site involves two main remedial components consisting of:

- a) A shallow groundwater recovery system designed to remove volatile organic compound (VOC) contaminants from the Upper Aquifer, and
- b) A deep groundwater recovery system designed to provide hydraulic containment of the dense, non-aqueous phase liquid (DNAPL) source area and removal of VOC contaminant mass from the Lower Aquifer.

A. Upper Aquifer Remediation Performance Standards:

The ultimate goal of the Upper Aquifer groundwater treatment system is (1) reduction of VOC levels in groundwater to Ambient Groundwater Quality Standards (AGQS) throughout the VOC source area in the Upper Aquifer and, (2) attainment of surface water quality standards for VOCs in the wetland and unnamed stream to the west of the active remediation area.

(1) On-Going Performance Evaluation.

The effectiveness of the Upper Aquifer groundwater treatment system shall be routinely evaluated via a trend analyses of VOC levels in the Upper Aquifer monitor wells, utilizing analytical data collected in accordance with Condition No. 7 of this permit. The hydraulic performance of the system shall be evaluated via a standard flow-net analysis to demonstrate that all groundwater flow lines which enter the Upper Aquifer VOC source area terminate at the Upper Aquifer recover well. The Upper Aquifer VOC source area boundaries shall be defined by a line enclosing the area defined by the following monitor wells and surface features:

Beginning at PS-4SR and proceeding southerly along the edge of the wetland to MK-44SR; thence due east to PS-6SR; thence due north to a point which is approximately 150 feet east of PS-4SR; thence west to the point of beginning, which is PS-4SR.

(2) System Termination.

Termination of the Upper Aquifer groundwater treatment system shall be requested by applying for a modification to this permit. Any request to terminate shall be based upon a demonstration that groundwater quality (as measured via sampling of the "Upper Aquifer Monitor Wells" listed under Condition No. 7 of this permit) under static (non-pumping) conditions meets AGQS, and surface water quality in the wetland and unnamed stream west of the active remediation area meets Surface Water Quality Standards. For purposes of this permit, static groundwater quality conditions shall be defined by sampling of the key monitor wells referenced above following a 60-day period during which the Upper Aquifer groundwater interception wells are not in operation. Temporary (60-day) cessation of treatment system operation may be performed at the discretion of the permittee. While attainment of AGQS is the ultimate goal of the Upper Aquifer remediation system, the Department will consider termination of active groundwater treatment in the Upper Aquifer for static groundwater quality conditions, which are above AGQS, provided that all of the following conditions are satisfied:

(continued)

GWP-198706012-B-003

-5-

- It is demonstrated, to the satisfaction of the Department, that any remaining VOC contamination in violation of AGQS will not result in a violation of Surface Water Quality Standards in the wetland and unnamed stream west of the active remediation area; and,
- It is demonstrated, to the satisfaction of the Department, that any remaining VOC contamination in violation of AGQS will not cause groundwater contamination beyond the boundaries of the Groundwater Management Zone for the Freudenberg-NOK site.

#### B. Lower Aquifer Remediation Performance Standards.

The ultimate goal of the Lower Aquifer groundwater remediation system is to provide hydraulic containment of the DNAPL source area within the deep overburden beneath the site.

##### (1) On-Going Performance Evaluation.

The effectiveness of the Lower Aquifer groundwater treatment system shall be routinely evaluated via a trend analyses of VOC levels in the Lower Aquifer monitor wells, utilizing analytical data collected in accordance with Condition No. 7 of this permit. The hydraulic performance of the system shall be evaluated via a standard flow-net analysis to demonstrate that all groundwater flow lines which enter the Lower Aquifer VOC source area terminate at a Lower Aquifer recovery well. A line enclosing the area defined by the following monitor wells shall define the Lower Aquifer VOC source area boundaries:

- Beginning at PS-20 and proceeding northerly to a point approximately 100 feet due west of PS-3d; thence easterly through PS-3d to a point approximately 50 feet due southwest of PS-14s; thence southerly to PS-7d; thence southwesterly to the point of beginning, which is PS-20.

##### (2) System Termination

Termination of the Lower Aquifer groundwater remediation system shall be requested by applying for a modification to this permit. The basis for termination of the Lower Aquifer groundwater remediation system shall be a demonstration that the VOC source in the Lower Aquifer has been removed (i.e., groundwater quality data from the Lower Aquifer monitor wells establish a consistent trend of water quality meeting AGQS).

## 12. FINANCIAL ASSURANCE

Freudenberg-NOK General Partnership will provide financial assurance information in accordance with the following schedule:

Within 30 days of the issuance date of this Permit, Freudenberg-NOK General Partnership shall submit to the Department a detailed written estimate of the cost of hiring a third party to perform the remaining remedial tasks and recommend a financial assurance mechanism to address these tasks.

(continued)

GWP-198706012-B-003

-6-

Within 30 days of Department approval of the financial assurance mechanism, Freudenberg-NOK General Partnership shall submit the financial assurance documentation to the Department.

Within sixty (60) days of the Department's approval of the financial assurance mechanism and cost estimate submit the financial assurance documentation to the Department.

  
Carl W. Baxter, P.E.  
Administrator, Hazardous Waste Remediation Bureau  
Waste Management Division

Under RSA 21-0:14 and 21-0:9-V, any person aggrieved by any terms or conditions of this permit may appeal to the Waste Management Council in accordance with RSA 541-A and N.H. Admin. Rules, Env-WMC 200. Such appeal must be made to the Council within 30 days and must be addressed to the Chairman of the Waste Management Council, c/o Appeals Clerk, Department of Environmental Services Legal Unit, 29 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095.

GWP-198706012-B-003