

**SITE MANAGEMENT PLAN**  
**DOVER MUNICIPAL LANDFILL**  
**SUPERFUND SITE**  
**DOVER, NEW HAMPSHIRE**

Prepared For:

Executive Committee of the Group of Work Settling Defendants  
Dover Municipal Landfill Superfund Site

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## TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
<b>1.0 INTRODUCTION.....</b>	<b>1</b>
1.1 OVERVIEW .....	1
1.2 OBJECTIVES .....	3
<b>2.0 SITE DESCRIPTION.....</b>	<b>4</b>
2.1 SITE DESCRIPTION .....	4
2.2 SITE HISTORY.....	5
<b>3.0 ACCESS.....</b>	<b>9</b>
3.1 SITE ACCESS.....	9
3.2 ACCESS TO PRIVATE/PUBLIC PROPERTY .....	9
3.3 PROPERTY OWNER NAMES, ADDRESSES, AND PHONE NUMBERS .....	10
<b>4.0 SITE SECURITY.....</b>	<b>11</b>
4.1 ROUTES OF ENTRY.....	11
4.2 SITE ACCESS .....	11
4.3 FIELD OFFICES.....	12
4.4 SITE SECURITY FOR HEALTH AND SAFETY.....	12
4.4.1 Controlled Access Area.....	13
4.4.2 Chemically Controlled Area .....	13
4.5 CONTINGENCY PLANNING .....	15
4.5.1 Personnel Roles and Lines of Authority .....	16
4.5.2 Evacuation Procedures .....	16
4.5.3 Emergency Medical Care .....	17
<b>5.0 FIELD ACTIVITIES.....</b>	<b>18</b>
5.1 AIR MONITORING PROGRAM .....	18
5.2 INVESTIGATION-DERIVED WASTE .....	18
5.2.1 Soil .....	19
5.2.2 Ground Water.....	19
5.2.3 IDW Disposal.....	20
5.3 DATA MANAGEMENT .....	21
5.3.1 Project Filing System .....	21
5.3.2 Field and Laboratory Data Filing System .....	22
5.3.3 Data Handling .....	22

**TABLE OF CONTENTS (continued)**

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
<b>6.0 PROJECT ORGANIZATION AND RESPONSIBILITIES.....</b>	<b>24</b>
6.1 PROJECT ORGANIZATION .....	24
6.2 PROJECT TEAM .....	24
6.2.1 Dover Group Project Manager .....	24
6.2.2 Project Manager .....	25
6.2.3 Health and Safety Officer.....	25
6.2.4 Field Team Leader .....	25
6.2.5 Technical Consultants/Team.....	26
6.3 U.S. ENVIRONMENTAL AGENCY .....	26
6.4 NH DEPARTMENT OF ENVIRONMENTAL SERVICES (NHDES) .....	27
6.5 SUBCONTRACTORS .....	27

**ATTACHMENTS**

**FIGURES**

1. Site Locus
2. Surface Water Flow Directions
3. Site Plan
4. Sample Property Access Letter
5. Property Ownership Information
6. Project Organization Chart

**TABLES**

1. Private Property Owner and Address Information
2. Project Team Contacts and Responsibilities

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**1.0 INTRODUCTION**

**1.1 OVERVIEW**

On [REDACTED] [JY1], the United States Environmental Protection Agency (USEPA) Region 1, in agreement with the New Hampshire Department of Environmental Services (NHDES), issued an Amended Consent Decree (ACD) requiring completion of Remedial Design/Remedial Action (RD/RA) activities at the Dover Municipal Landfill Superfund Site (the Site) pursuant to the 2004 Amended Record of Decision (2004 AROD).

The ACD requires the parties identified as Respondents (i.e. the Group) to complete the RD/RA pursuant to authority under, and in accordance with, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and its amendments. The specific activities, procedures, and criteria by which the RD/RA is to be performed are described in the ACD Statement of Work (SOW).

The Group retained GeoInsight as the General Contractor to implement the RD/RA. GeoInsight teamed with Xpert Design and Diagnostics, LLC (XDD) and GeoSyntec Consultants to assist in scoping the RD/RA and preparing associated Work Plans. The Group has designated Michael J. Webster of GeoInsight, Inc. (GeoInsight) as the Project Manager with responsibility for administration of all PDI and RD/RA activities identified in the ACD.

The RD/RA Program Plan is comprised of three integrated project plans that will guide the completion of this RD/RA. They are detailed in three volumes including:

- the Site Management Plan (SMP), which provides a written description as to how various general project requirements such as access, security, contingency procedures, management responsibilities, investigation-derived waste disposal, and data handling will be managed;

- the Quality Assurance Project Plan (QAPP), which documents in writing the site-specific objectives, policies, organizations, functional activities, sampling and analysis activities, and specific quality assurance/quality control activities designed to achieve the data quality objective of the RD/RA (prepared in accordance with the format required by USEPA Region 1); and
- the Health and Safety Plan (HASP), which establishes the procedures, personnel responsibilities, and training necessary to protect the health and safety of all on-Site personnel during the RD/RA from biological, physical, and chemical hazards associated with routine field activities and unexpected Site emergencies.

In addition to these program plans, individual Work Plans will be developed for site-specific pre-design investigation (PDI) activities at the Landfill. The Work Plans will present detailed descriptions of the objectives and methods for the work to be completed for the individual PDIs. The detailed descriptions will include a statement of purpose and objectives, identification of the specific activities necessary to complete the task, and an anticipated schedule for completion.

Individual PDI Work Plans developed for the site will include:

- Northwest Landfill PDI Work Plan;
- Southern Plume PDI Work Plan;
- Air Sparging Trench Pre-Construction PDI Work Plan;
- Soil Vapor Intrusion PDI Work Plan;
- Focused Ecotoxicity Assessment PDI Work Plan;
- Ground Water Flow and Fate and Transport Model PDI Work Plan;
- Eastern Plume PDI Work Plan; and
- Outdoor Air Assessment PDI Work Plan.

As PDI activities are completed, the project will enter the RD/RA stage, at which time additional work plans will be completed including:

- Source Control RD Work Plan;
- Southern Plume Management of Migration RD Work Plan; and
- Eastern Plume Monitored Natural Attenuation Implementation Work Plan.

At the RA stage of the RD/RA effort, a third set of work plans will be prepared including a Source Control RA Work Plan and a Southern Plume Management of Migration RA Work Plan.

## 1.2 OBJECTIVES

The SMP provides a written understanding and commitment as to how various project requirements such as access, security, contingency procedures, management responsibilities, investigation-derived waste disposal, and data handling will be managed. Each Work Plan developed under the ACD will contain a Site Management Plan (SMP) Section that will contain the details of the preceding requirements. The SMP Section will also define the work area, restoration activities (if necessary), and wetland protection measures that will be used while implementing the Work Plan. GeoInsight is committed to administering the elements of this SMP as described in the sections that follow. To assure that the SMP continues to serve its purpose throughout the RD/RA, it will be updated as necessary to reflect new information or significant changes in the project team, scope, or objectives.

This SMP is organized as follows:

- Section 1.0 describes the project overview and SMP objectives;
- Section 2.0 presents a summary description and history of the Site;
- Section 3.0 describes procedures for obtaining approval to access private/public property;
- Section 4.0 describes security and contingency measures;
- Section 5.0 describes the approach to various project-related field activities; and
- Section 6.0 presents information regarding the key management personnel for the PDI and RD/RA.

## 2.0 SITE DESCRIPTION

### 2.1 SITE DESCRIPTION

The Landfill is located to the west of Tolend Road in the west corner of the City of Dover (City). The Landfill operated from approximately 1960 to 1979. Features of the Landfill and surrounding area and general surface water flow directions are illustrated on Figures 1 and 2, respectively. The Landfill is bordered by the Hoppers wetland to the north, residential properties along Tolend and Glen Hill Roads to the east, and forested wetlands to the south. The Cochecho River and Bellamy Reservoir are located approximately 1,500 feet northeast and 2,500 feet south of the Landfill, respectively. Land located to the west and south between the Landfill and the Bellamy Reservoir consists of undeveloped woodland and forested wetlands.

The Landfill surface is generally topographically flat with a slight increase in elevation (approximately 10 feet) from the east side of the Landfill to the northwest corner. The eastern, northeastern, and localized areas of the north portion of the Landfill are covered by small trees and shrubs. The central and southern portion of the Landfill is covered by sparse vegetation including grass and low brush. Access to the Landfill is via a gate and dirt access road located at the southeast corner of the Landfill, just north of the intersection of Tolend and Glen Hill Roads.

A shallow drainage ditch along the toe of the Landfill (known as the “perimeter ditch”) collects surface water runoff and intercepts, at least seasonally, shallow ground water flow. This drainage feature has been referred to as the “perimeter ditch.” The perimeter ditch discharges (via a series of culverts) to an erosion gully that is located to the east of the intersection of Tolend and Glen Hill Roads. This gully is referred to as the “swale.” The swale trends northeast/southwest and discharges to the Cochecho River approximately 800 feet east of the Landfill. The elevation of surface water in the Cochecho River is approximately 30 feet lower than the ground surface along Tolend Road. A Site Plan that includes the Landfill and areas immediately surrounding the Site is included as Figure 3.

A more detailed description of the Site is presented in Section 1 of the Revised Focused Feasibility Study Addendum (the USEPA Addendum) prepared by the USEPA (June 18, 2004), and in Section 1 of the Revised Focused Feasibility Study (the RFFS) prepared by the Respondents, dated January 30, 2004.

## **2.2 SITE HISTORY**

The Landfill operated from approximately 1960 to 1979. The unlined Landfill accepted both domestic and industrial waste material from the surrounding community. Early operational practices included emptying drums of liquid wastes into pits excavated to the water table and burning waste prior to disposal. Waste disposal initially occurred in the eastern portion of the Landfill and progressed westward until the current aerial extent of the Landfill was reached (approximately 47 acres). The thickness of the waste material is variable but generally increases from the east to the west, with a maximum thickness of approximately 24 feet in the west-central portion of the Landfill (Figure 3-1 of the Golder Associates, Inc. (Golder) 1995 PDI report illustrates the limits and relative thickness of waste material within the Landfill). Initial Landfill closure activities were completed in 1980 and consisted of placing clean fill over the existing Landfill surface. In the early 1980s, additional closure activities were undertaken and included the excavation of the perimeter ditch along the Landfill toe to collect surface water runoff and intercept shallow ground water flow.

The Site was placed on the National Priority List (NPL) on September 8, 1983. The primary Constituents of Concern (COCs) identified at the Site included volatile organic compounds (VOCs) and arsenic. The primary environmental media impacted by the Site included ground water located under and downgradient of the Landfill (VOCs and arsenic) and sediment within the perimeter ditch and swale (arsenic). A Remedial Investigation (RI) was completed by Goldberg-Zoino & Associates, Inc. (GZA) and Wehran Engineers and Scientists (Wehran) in 1988 and was based upon the results of characterization activities completed during 1985 and 1986. A Field Elements Study (FES) was completed for the Group by HMM Associates (HMM) in 1990 and was based upon the results of sampling activities completed during 1989. The FES was completed to address certain technical issues that were not fully evaluated in the RI. A

Feasibility Study (FS) was completed by HMM in February 1991.

Based upon the data presented in the RI, FS, and FES, a Record of Decision (ROD) was issued by the USEPA on September 10, 1991 and a Consent Decree for Remedial Design/Remedial Action between the USEPA and the Group was finalized on August 7, 1992. The 1991 ROD selected capping of the landfill, ground water migration mitigation measures (a 25-foot deep ground water interception/diversion trench around the Landfill perimeter), natural attenuation of the ground water in the Eastern Plume, and pump-and-treat of ground water in the Southern Plume.

Since the 1991 ROD was issued, investigation activities were completed, including the Southern Plume PDI (SEA Consultants, Inc. (SEA), 1994) and Golder PDI Report (1995), and semiannual Environmental Monitoring Plans (EMP) (Golder, 1993 to present). Focused investigations completed since the 1991 ROD include the Trench and Swale Characterization (GeoInsight, 1998), Draft Final Bioremediation Pilot Assessment (Envirogen, Inc. (Envirogen) and XDD, 2001), and Revised Focused Feasibility Study Report (GeoInsight, XDD, and Shaw, 2003). In June 2004, USEPA issued a Focused Feasibility Study Addendum.

These post-ROD characterization activities provided additional information regarding hydrogeologic and environmental conditions at the Site. In particular, PDI activities provided additional information regarding the stratigraphy and hydraulic conditions within the hydrostratigraphic unit impacted by the Landfill (located above a marine clay layer underlying site), and PDI EMP data provided additional information regarding ground water quality conditions.

### **Focused Feasibility Study**

In May 1996, GeoInsight completed a focused feasibility study (FFS) for the Site. The objective of the FFS was to compare the selected 1991 ROD remedy to two *in situ* alternatives that appeared to be applicable based upon Site-specific technical data and advances in remedial experience and technologies since the 1991 ROD was issued. The *in situ* alternatives evaluated

in the FFS included a biowall (aerobic treatment trench) and an *in situ* treatment zone. The FFS was performed in accordance with USEPA guidance for conducting a detailed evaluation of alternatives in a Feasibility Studies (FS) under the CERCLA. The results of the FFS are described in the completed report (GeoInsight, 1996).

### **Bioremediation Pilot Project – Treatment Zone Demonstration (TZD)**

Based upon the results of a bench-scale treatability study (Envirogen, 1995), limited field sparging study (Envirogen, 1996), the FFS (GeoInsight, 1996), and discussions with the USEPA and NHDES, the regulatory agencies approved implementation of a bioremediation pilot project at the Site. A Treatment Zone Demonstration (TZD) of an *in situ* biodegradation remedy was performed by the Group at the Site between 1996 and 2001 under an Administrative Order by Consent signed with the agencies in 1997. The TZD included a pilot test of *in situ* sequential anaerobic and aerobic enhanced biodegradation to address ground water impacts near the toe of slope of the Landfill. The results of the TZD project were described in the Draft Final Bioremediation Pilot Assessment (Envirogen and XDD, 2001), that was reviewed, but not approved, by the NHDES and the USEPA.

### **Revised Focused Feasibility Study**

Based upon discussions with USEPA and NHDES, site-specific information derived from previous studies and the TZD project was used to evaluate a Landfill bioreactor/aerobic treatment trench remedy and compare performance of such a remedy to the source control remedy selected in the 1991 ROD. To complete the required evaluation of the alternative remedy, the 1996 FFS was revised to include a detailed evaluation of four remedial alternatives: the No Action Alternative, the 1991 ROD Remedy, the Alternative Remedy (i.e., an aerobic treatment trench), and the Mixed Alternative Remedy.

Prior to evaluating these remedial alternatives, Site conditions were evaluated to assess possible changes (compared to conditions when the RI/FES/FS were completed) and changes to toxicological information and assumptions that were used in previous risk assessments. Results

of more recent EMP sampling events (August 2000, December 2000 and Summer 2001) were used to evaluate whether conditions at the Site, and associated potential risks to human health and the environment, had changed significantly since the 1991 FS was completed.

The RFFS also included a preliminary ecological risk assessment. The preliminary ecological risk assessment was completed during 2002 and 2003 and included collecting and analyzing sediment and surface water samples from the perimeter ditch, the drainage swale, and the Cochecho River. The results of the preliminary ecological risk assessment were summarized in Section 2.0 of the RFFS.

On June 18, 2004, USEPA completed a FFS Addendum based upon review of the RFFS. In addition to summarizing the results of investigation activities completed at the Site since the 1991 ROD was issued, the FFS Addendum include an evaluation and comparison of remedial alternatives. Based upon information presented in the FFS Addendum, USEPA issued an AROD for the Site on September 30, 2004. The AROD revised the Source Control (SC) component of the 1991 ROD to include an air-sparging trench installed along the southern perimeter of the Landfill that is keyed into the underlying marine clay unit. In addition, it included ground water extraction and treatment for Management of Migration of the Southern Plume, Monitored Natural Attenuation (MNA) for Management of Migration of the Eastern Plume, evaluation of potential indoor air exposures in residences located in the path of the Eastern Plume, and focused evaluation (Tier 2) of potential ecotoxicity effects of arsenic in sediments in the river.

More detailed information regarding the history of the Site is included in Section 1 of USEPA's June 18, 2004 FFS Addendum and Section 1 of the January 30, 2004 RFFS.

### **3.0 ACCESS**

#### **3.1 SITE ACCESS**

The majority of the land encompassed by the Site is currently owned by the City . As a member of the Group, the City has authorized access to complete all necessary PDI and RD/RA activities on City-owned property.

The City has also granted access to the Site (i.e., city-owned property) to USEPA, the State and their employees, agents, contractors, consultants, and other authorized representatives for purposes of implementing and overseeing the implementation of work to be performed under the ACD.

#### **3.2 ACCESS TO PRIVATE/PUBLIC PROPERTY**

The City currently has informal access arrangements with several property owners located along Tolend Road to conduct annual EMP monitoring activities. In addition, the owners of three properties provided access to install shallow ground water monitoring wells associated with the sentinel well portion of the EMP program. Additional access to local private properties is required to complete a number of PDI activities including:

- evaluation of ground water conditions on the north side of Tolend Road to the east of the Landfill associated with Vapor Intrusion PDI activities;
- sediment sampling activities within and along the Cochecho River associated with Focused Ecotoxicity Assessment PDI activities; and
- characterization activities to the south and west of the Landfill associated with Southern Plume PDI activities.

To date, the City has been instrumental in and has facilitated access to nearby private properties for necessary characterization and response activities. Consistent with practices employed to date, we expect to continue to use City resources, as warranted, to facilitate completion of PDI and RD/RA activities on private properties. Initial contact with private property owners regarding access to properties to complete PDI and RD/RA activities will be coordinated by the

Respondents' Project Coordinator, an employee of the City, through verbal communication (the method that has been used to date).

When more formal permission to access off-Site private or public property is needed to execute the PDI and RD/RA activities, a letter requesting access will be prepared by the Project Coordinator and sent via registered mail or overnight courier service to the property owner(s) at least twenty (20) days in advance of the required work. The letter will inform the property owner of the planned PDI/RD/RA activities, describe the nature and anticipated duration of the planned work, provide a description of the potential impacts of the work, provide assurance that such impacts will be mitigated to the extent practicable, and describe restoration plans, if appropriate. An example of the notification letter is included as Figure 4.

The USEPA will be informed of access-related issues, should they arise. In the event that the Respondents and GeoInsight are unable to obtain an access agreement, GeoInsight will notify the USEPA in writing. The notification will include a description of the efforts made to obtain the necessary access, and the reason for the lack of success. USEPA may then order access or approve alternative sampling locations, as appropriate.

### **3.3 PROPERTY OWNER NAMES, ADDRESSES, AND PHONE NUMBERS**

The work outlined in the ACD and SOW includes a variety of initial off-Site field activities. Off-Site field activities will include, but are not limited to collection of surface water, sediment, and ground water samples from existing monitoring wells, and the installation of soil borings, and ground water monitoring wells. Table 1 identifies known off-Site properties (addresses, names, and telephone numbers) to which access may be required during PDI and RD/RA activities. The location of off-Site sample locations are provided on Figure 5.

Should the results of the PDI or RD/RA activities indicate that additional field activities on properties beyond the Site boundary that have not been identified in Table 1 are warranted, the USEPA will be informed, and the appropriate property owner(s) will be contacted to request access.

## **4.0 SITE SECURITY**

### **4.1 ROUTES OF ENTRY**

The point of entry for the Landfill is a locked swing-gate entrance located on the southwest side of Tolend Road, approximately 200 feet north of the intersection of Tolend and Glen Hill Road. The gate provides access to a dirt road that crosses to the central and western portions of the Landfill. Portions of the Landfill to the north and south of the entrance are bordered by a chain link fence. However, the fence is only located along the road and does not extend along the property boundaries leading away from the road.

Two dirt paths/roads are located south of the Landfill along the southwest side of Tolend Road. These paths are accessed via gates in the chain link fence and provide access to the forested wetlands located to the east and south of the Landfill. A dirt path is also located to the north of the Landfill and provides access to the woodlands and forested wetlands to the north of the Landfill. This path does not have a gate.

Access to the swale is from a small utility parking lot located on the east side of the intersection of Tolend and Glen Hill Roads. Access to the Cochecho River is from the swale, or from City-owned property located on the north side of the Cochecho River along County Farm Road.

### **4.2 SITE ACCESS**

During PDI and RD/RA activities, access to investigation areas and activities will be controlled by the Field Team Leader. Access gates will be kept closed and will be locked at the end of the day. Equipment to be used during the PDI and RD/RA activities will be transported to the Site daily or locked inside vehicles, trailers, or Site structures.

While Site activities are in progress, the Field Team Leader and project staff will be alerted to the entrance to or presence on the Site of unauthorized personnel. If unauthorized personnel are observed by the field staff, they will attempt to ascertain the reason the person(s) entered the

Site, attempt to respond to questions the individual(s) may have, and recommend that the individual(s) leave the Site. If individuals refuse to leave the Site and insist upon entering areas where they may be injured, the Field Team Leader will suspend affected Site activities and notify the Project Coordinator and Project Manager. If necessary, the Field Team Leader will contact the local police, the City, or USEPA to obtain assistance in clearing the Site.

### **4.3 FIELD OFFICES**

The Butler building that was constructed on the western portion of the Landfill for the TZD project will be established as the headquarters for general field program activities at the Site. The field office will have, at a minimum, electrical power, telephone communication, and space for equipment and storage of field project files. Depending upon the needs of the field work, the office may contain computer(s), printer(s), and fax machines. Additional space for subcontractors, USEPA, and NHDES personnel and contractors will be provided, if practicable. Trailers may also be transported to the Site for locked equipment storage, as warranted.

During SC and Management of Migration (MOM) design activities, the need for, location, and configuration of support offices associated with the construction of the air sparging treatment trench and Southern Plume ground water extraction and treatment system will be evaluated and developed. Prior to implementation of RA activities associated with the treatment trench, the SMP will be revised to incorporate SC- and MOM-specific implementation considerations.

A designated location will be established to stage subcontractor drilling and/or excavation equipment and supplies. It is expected that the existing chain-link fence enclosure that was constructed on top of the middle of the Landfill during 1994 PDI activities will be renovated and used to stage waste materials, containers, and equipment that require security.

### **4.4 SITE SECURITY FOR HEALTH AND SAFETY**

Under this SMP, areas within the Site will be designated as Controlled Access Areas or Chemically Controlled Areas (CCAs) during specific PDI and RD/RA activities. These areas

will be established by the Health and Safety Officer (HSO) prior to the start of a specific work activity. The areas will be established based upon a review of available Site information, potential chemical hazards, and health and safety hazards associated with the specific work activity. Access to these areas will be managed in accordance with procedures described in the individual Work Plans. For additional information regarding Health and Safety protocols, refer to the Health and Safety Plan (HASP) prepared as part of the RD/RA and PDI.

#### **4.4.1 Controlled Access Area**

The CAA is the area within the Site boundary where access is controlled for security purposes. There are no training or personal protection requirements for entrance into the CAA.

#### **4.4.2 Chemically Controlled Area**

A CCA is an area within the CAA where access is controlled for health and safety purposes associated with potential chemical contamination. To prevent both exposure of unprotected personnel and migration of contamination due to tracking by personnel or equipment, work areas and associated personal protective equipment (PPE) requirements will be clearly identified.

Areas of the Site where field activities will be conducted will be identified as a CCA prior to and during field work activities. CCAs will be subdivided into three zones: an Exclusion Zone, a Contamination Reduction Zone (CRZ), and a Support Zone. A log of persons entering a CCA at the Site will be maintained by the HSO or his/her designee.

**Exclusion Zone.** The Exclusion Zone isolates the area of subsurface investigation. The Exclusion Zone serves to restrict the spread of potential contamination from work areas of the Site to support areas and off-site locations. The Exclusion Zone will be demarcated by a tape line or physical barrier. Personnel entering the Exclusion Zone must: (1) enter through the CRZ; (2) wear the prescribed level of protection; and (3) be otherwise authorized to enter the Exclusion Zone. Any personnel equipment or materials exiting the Exclusion Zone will be deemed to require chemical decontamination in the CRZ. Equipment and materials will either be

subject to decontamination or collected in uncontaminated containers for decontamination at a designated location.

Within the Exclusion Zone, specific locations or restricted areas (clearly marked or identified) may be established if warranted for specific Site operations. For example, prior to sampling or using heavy equipment, a restricted area will be established that includes an appropriate area for the heavy equipment operation. Specific emergency service access to areas of Site operations will be established.

**Contaminant Reduction Zone.** The CRZ is a transition zone between the Exclusion Zone of the Site and support areas central to the investigation activities. It is designated by a tape line between the Exclusion Zone and the beginning of the CRZ, and by a control line between the CRZ and support areas. Field personnel, equipment, and materials that leave the Exclusion Zone require decontamination. After undergoing the decontamination process or containerization, personnel equipment and material will be permitted to exit the CRZ.

Within the CRZ there is a Contamination Reduction Corridor (CRC). In the CRC, materials necessary for field personnel and portable equipment decontamination and certain safety equipment associated with normal work-related incidents are staged. A separate area at the Site will be designated for the decontamination of heavy equipment, such as drilling rigs.

**Support Zone.** Support zones will be established based upon the primary location in which field activities are being completed under individual Work Plans. The support zones will contain the necessary support facilities (including, if warranted, field office and project management trailer) for Site operations and general administrative and logistical activities. It also serves as the communication center, provides storage of sampling equipment and PPE, and is the source of emergency assistance for operations in the Exclusion Zone and CRZ. The zone shall be set up in an area of the Site that is known to be or is likely to be free of contamination.

Controlled access issues are discussed in greater detail in Sections 6 and 7 of the HASP.

#### 4.5 CONTINGENCY PLANNING

Prior to conducting on-Site activities during the PDI and RD/RA that have potential to create hazardous conditions, GeoInsight will coordinate such work with federal, state and local authorities as necessary to protect the health and safety of on-Site workers and area residents that might be affected by those particular activities. Based upon the current understanding of ACD and SOW objectives and discussions with USEPA and NHDES regarding the individual Work Plans, with the exception of possible test pitting activities within the landfill, we have not identified PDI and RD/RA activities that may potentially create hazardous conditions on or off site.

Upon the occurrence of any event during the Work that causes or threatens a release of hazardous substances from the Site that endangers the public health, welfare, or the environment, GeoInsight will promptly take appropriate action to prevent, abate, or minimize such release or endangerment. GeoInsight will also verbally notify the USEPA Remedial Project Manager (RPM) within twenty-four (24) hours or, in the event the RPM is not available, will notify within the same period the Regional Duty Officer of the Emergency Planning and Response Branch, USEPA Region 1, telephone (617) 918-1236. GeoInsight will act in accordance with applicable provisions of Section 11.0 of the HASP in responding to such events.

GeoInsight will submit a written report to USEPA within five (5) days after verbally notifying USEPA of each such event describing: (i) the event that occurred; (ii) measures taken and to be taken to mitigate any harm caused or threatened by the event and (iii) measures taken and to be taken to prevent the recurrence of such an event. Whether or not such a report is made to USEPA or the State, if the USEPA determines that activities in compliance or noncompliance with the ACD have caused or may cause a release of a hazardous substance posing a threat to the public health or welfare or to the environment, USEPA may: (i) stop further implementation of the ACD for such period of time as may be needed to abate such release or threat; and/or (ii) undertake any action which USEPA determines is necessary to abate such a release or threat. The Project Manager and Field Team Leaders will support and facilitate such actions as USEPA determines to be necessary.

Baseline air quality data will be obtained during implementation of trench construction associated with RD/RA activities. The specific monitoring program will be described in the 100 percent design report. If evaluation of baseline data indicates the potential for threats to human health, a program will be established to monitor for the presence of such threats. The monitoring program, if necessary, may include periodic sampling of air quality, and, based upon the results of this monitoring, the Site Health and Safety officer will take appropriate actions to mitigate human health risk. Mitigation may include modifying activities performed or techniques being used, or temporarily suspending activities until air monitoring indicates the health threat has subsided to acceptable levels.

#### **4.5.1 Personnel Roles and Lines of Authority**

The Field Team Leader or Site Health and Safety Officer will have primary responsibility for responding to and resolving emergencies. They will direct measures to protect the safety of Site personnel and the public, to the extent of their authority. These measures may include evacuation of personnel from an on-Site area or directing initial responses to medical emergencies. The Field Team Leader or Site Health and Safety Officer is also responsible for confirming that appropriate measures have been implemented, appropriate authorities notified, and follow-up reports completed with regard to a Site emergency.

Field work will be conducted in teams of at least two persons. Team members will constantly be aware of the location of their partners.

#### **4.5.2 Evacuation Procedures**

In the event of an emergency that necessitates evacuation of the Site, the procedures listed below will be followed:

1. Hand signals, audible communication, or an evacuation alarm of three blasts on an air horn will notify personnel to evacuate the site immediately.

2. All personnel will evacuate with their field partners to the closest exit upwind of on-Site activities. They will then assemble in a designated safe area.
3. Personnel will remain in that area until an all-clear signal (single, long air horn blast) is sounded or an authorized individual provides further instructions.

#### **4.5.3 Emergency Medical Care**

Any person who becomes ill or injured in the Exclusion Zone must be decontaminated to the maximum extent practicable. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed (i.e., the victim will be disrobed to the extent necessary, then re-dressed). First aid should be administered while awaiting emergency medical services (EMS). Any person being transported to a clinic or hospital for treatment should take with them information about chemical(s) they may have been exposed to at the Site, if applicable. All injuries and illnesses must be reported immediately to the Field Team Leader or Site Health and Safety Officer. Emergency telephone numbers are provided in the HASP and will be posted at the site.

## 5.0 FIELD ACTIVITIES

### 5.1 AIR MONITORING PROGRAM

The environment in Exclusion Zones established will be monitored to ensure that any immediately dangerous to life and health (IDLH) or other hazardous conditions are identified. Provisions for the monitoring of airborne contaminants that may be released at the Site by PDI and RD/RA activities are described in Section 8.0 of the HASP

### 5.2 INVESTIGATION-DERIVED WASTE

Investigation-derived waste (IDW) generated during the PDI and RD/RA may include:

- soil;
- sediment
- ground water;
- debris; and
- other materials
  - PPE
  - sampling equipment
  - plastic sheeting, containers, etc.

These wastes will be managed in a manner that limits exposure of Site personnel to hazardous materials and prevents introduction of contaminated materials to uncontaminated environmental media at the Site (e.g., ground water, soil). The following Standard Operating Procedure (SOP) establishes protocols for testing, storage, and disposal of these materials.

IDW will be managed to limit the potential for release of contaminated materials to the environment. Spoils generated during the PDI and RD/RA may include, but are not limited to: soil cuttings and drilling fluids from soil boring advancement; water from well development,

well purging and sampling, and equipment decontamination, and PPE. IDW shall be segregated by type to facilitate characterization and off-Site disposal of the materials.

In general, IDW identified as potentially contaminated with hazardous materials will be stored in a designated and clearly marked IDW management area. Storage piles and vessels will also be clearly labeled to indicate the source of the IDW. The IDW storage area will be inspected to ensure that storage procedures are being followed. Violations of these procedures will be documented and remedied as quickly as possible. Potentially contaminated IDW will be identified based on its origin, olfactory and visual evidence, and field screening results. Laboratory testing may be required to determine the proper disposition of IDWs.

### **5.2.1 Soil**

During PDI and RD/RA activities, impacted soil will be generated as drill cuttings, test pit spoils, and excess sample materials. The required testing and handling of these IDWs will depend upon their origin and characteristics. Soil will be screened with a field PID/FID to identify the potential presence of VOCs. Screening results will be used to evaluate whether the soil contains potentially elevated levels of hazardous materials. For headspace screening purposes, PID/FID readings in excess of 10 parts per million (ppm) will be considered to indicate the presence of contamination. Soil above the screening levels will be judged to contain hazardous materials and be segregated and/or stockpiled.

Test pit spoils and soil without evidence of contamination (as indicated by field screening) may be returned to the location where they were generated provided only small volumes (less than 5 cubic yards) are generated. Otherwise, they will be stockpiled in the IDW management area and marked as to their origin. Stockpiled soil will be managed and secured to prevent erosion.

### **5.2.2 Ground Water**

Ground water may be generated during drilling, well development, pumping tests, and monitoring well purging and sampling. Ground water, with the exception of purge water

berms, and polyethylene sheeting or tarps secured to the top of the piles (using weights or stakes).

### **5.2.2 Ground Water**

Ground water may be generated during drilling, well development, pumping tests, and monitoring well purging and sampling. Ground water, with the exception of purge water generated during sampling, will be contained, sampled, and tested to determine if on-Site disposal is appropriate. The relatively small quantities of ground water generated during monitoring well purging and sampling will be returned to the monitoring well from which it was pumped after sampling is completed.

Ground water generated during pump tests may be containerized and treated on site or off-Site. Water management issues associated with completing pump tests at the Site will depend upon the specific parameters and types of tests performed. In particular, water management issues will likely depend upon the duration of the tests, the estimated rate of water generation (i.e., fast or slow accumulation of extracted water), and the estimated total volume of water to be generated. Water management options include localized treatment and discharge on site (using a temporary storage vessel and granulated activated carbon), temporary storage on site (during the test) and off-site disposal at the Dover POTW, or temporary storage on site (during the test) and off-site disposal at a licensed facility.

Ground water pump tests are a possible component of the South Plume Work Plan. Prior to completing a pump test, we anticipate that a detailed pump test plan will be prepared and provided to the agencies for review and approval. Detailed water management issues associated with site-specific pump tests will be included in this plan.

### **5.2.3 IDW Disposal**

Contaminated IDW will be staged on Site until properly disposed. IDW will be shipped to a properly licensed disposal facility after complying with waste characterization or stabilization

requirements. Materials impacted by hazardous substances, pollutant or contaminants transferred off-Site for treatment, storage, or disposal will be managed in compliance with 40 CFR 300.440. Transfers of such materials will only occur after meeting all regulatory (CERCLA, RCRA, etc. ) requirements and approval by USEPA. Prior to such transfers, written notification of the proposed transfer will be provided to the USEPA and the appropriate state environmental officials in the receiving facility's state. Written notification will include at least the following information: (i) the name and location of the facility to which the impacted materials are to be transferred; (ii) the type and quantity of the hazardous substances, pollutants, or contaminants contained in the materials to be transferred; (iii) the expected schedule for the transfer; and (iv) the method of transportation.

PPE will be employed, as warranted, to protect Site personnel from potential exposure to contaminants. However, based upon the nature of proposed field activities, the majority of disposable clothing and other PPE will not be significantly contaminated. Accordingly, disposable equipment and clothing will be segregated on Site. Disposable equipment and clothing that have not been significantly contaminated will be placed in plastic bags and managed and disposed of as solid waste. Equipment and PPE that may have come in contact with elevated concentrations of Site Chemicals of Concern (COCs), such as Tyvek clothing used during sediment sampling, will be placed into 55-gallon containers and disposed as Special Waste.

### **5.3 DATA MANAGEMENT**

This section describes the filing, storage, manipulation, and retrieval of records, documents, existing data and site data developed during the PDI and RD/RA. Data management will include three primary elements: a project filing system, a field and laboratory data file, and an electronic data management system. Additional information regarding data management and record retention is provided in Section 15.0 of the QAPP. Data to be generated during PDI and RD/RA activities include, but are not limited to:

- physical properties of subsurface materials;

- boring and well construction logs for wells and piezometers;
- elevation and location data for soil, ground water, surface water, sediment monitoring locations;
- laboratory analytical information; and
- hydraulic information.

### **5.3.1 Project Filing System**

The project filing system will be a manual storage system established at GeoInsight's office in Westford, Massachusetts. The project filing system will use the individual PDI tasks and major work elements as categories for structuring the files.

Files for the project will include such materials as reports, documents, meeting and telephone conversation notes, copies of electronic correspondence (including e-mail), progress reports, and correspondence. When a document is applicable to more than one task or work element, the first page of the document with a cross-reference to the full document will be placed in the files at appropriate locations.

The project files will be maintained by GeoInsight in a secured, limited access area. Original documents collected or generated during the project will be stored in the assigned location in the project filing system. Copies will be prepared from the originals for use by individual staff working on the project. The structured filing system will serve as a master repository for information and not as working files. A master list of major reports and reference documents will be developed and maintained as part of the files. The date the document is received or generated and the file location will be included on the list. Project files will be managed by the Project Manager while the project is active, and use of the elements of the file will be controlled through a sign-out protocol. In addition to paper copies, electronic copies of documents and data will be maintained on suitable media.

### **5.3.2 Field and Laboratory Data Filing System**

The field and laboratory data filing system will include manual and electronic storage system established at GeoInsight's Westford, Massachusetts office and maintained as described in Section 15.0 of the QAPP. Analytical data will be reported in hard copy form, but stored in both electronic and hard copy form. Field and laboratory data in hard copy format will typically be filed chronologically by date of sampling. Reported analytical results will include both the sample identification and date of sample collection for reference. Electronic files will be maintained on suitable media. Field log books, sample logs, sample data sheets, chain-of-custody records, and laboratory QA/QC reports will be designated with a task number and stored in a central project filing system.

### **5.3.3 Data Handling**

This Site has undergone many phases of investigation. However, data obtained during these investigation activities were not historically archived in a consistent and readily accessible manner. A single resource has not been developed for the storage, analysis, and reporting of historical, current, and future Site data. A standardized database for the EMP events were constructed using Excel to store and report historical ground water monitoring information. This database was used to facilitate development of a Conceptual Site Model in support of pre-design and remedial action activities.

Data obtained during subsequent investigation activities will be added to the relevant existing databases of ground water and surface water quality monitoring results (i.e., results that augment the current semiannual ground water EMP events). Because additional activities to be completed are expected to focus primarily upon localized conditions or specific design considerations (i.e., Site-wide characterization activities are largely completed), it is not expected that a detailed data management system or database will be required for on-going activities. It is anticipated that much of the additional data collected at the Site will be summarized and organized in individual Excel spreadsheets. Task-specific data management requirements will be discussed in the individual Work Plans

## **6.0 PROJECT ORGANIZATION AND RESPONSIBILITIES**

### **6.1 PROJECT ORGANIZATION**

The Respondents to the ACD organized as the Work Settling Defendants (the Group), and retained Michael J. Webster of GeoInsight as their Project Manager to manage and direct all work under the ACD at the Site. GeoInsight was also retained as the General Contractor to implement all necessary work under the ACD. Figure 6 illustrates the overall project organization and principal lines of communication and authority. GeoInsight will retain subcontractors, as needed, to perform the work. Table 2 identifies the primary project team members and key personnel working on the project, and summarizes their roles and responsibilities.

### **6.2 PROJECT TEAM**

#### **6.2.1 Dover Group Project Manager**

The Project Coordinator for the Group is:

Dean Peschel  
Dover Landfill Executive Committee  
City of Dover  
288 Central Avenue  
Dover, New Hampshire 03820  
(603) 516-6094  
(603) 516-6463  
dean.peschel@ci.dover.nh.us

As Project Coordinator for the Dover Group, Mr. Peschel will be the primary point of contact with USEPA regarding the ACD. Mr. Peschel will also be the Dover Group's point of contact with the Project Manager, and will facilitate PDI, and RD/RA activities associated with the Site. Mr. Peschel will also be responsible for communications with representatives of the City and local citizens.

### **6.2.2 Project Manager**

The Project Manager is:

Michael J. Webster, P.G., L.S.P.  
GeoInsight, Inc.  
319 Littleton Road, Suite 105  
Westford, Massachusetts 01886  
(978) 692-1114  
(978) 692-1115 (Fax)  
mjwebster@geoinc.com

As Project Manager, Mr. Webster will be responsible for:

- contract negotiations and internal performance monitoring for subcontractors and vendors;
- overall technical responsibility for the work performed in each task;
- coordination and liaison with USEPA and NHDES regarding field activities; and
- communication and liaison with local officials and the public (as warranted).

### **6.2.3 Health and Safety Officer**

A Health and Safety Officer (HSO) will be assigned for each component of the PDI and RD/RA. The HSO will be responsible for matters related to health and safety, including implementation of the Site-specific HASP; conducting Site safety meetings and Site-specific training of personnel; investigation of health and safety-related incidents at the Site; and updating and modifying the HASP, as necessary, if Site or environmental conditions change.

### **6.2.4 Field Team Leader**

A Field Team Leader will be assigned for each component of the PDI and RD/RA. The Field Team Leader will be responsible for coordination and implementation of field sampling and

investigation activities. Data collected during the investigation, field QA/QC measures implemented and organization of field information will be performed by the Field Team Leader. In addition, the Field Team Leader will schedule sample container delivery and pickup, and oversee sample chain of custody documentation.

### **6.2.5 Technical Consultants/Team**

GeoInsight teamed with XDD and GeoSyntec Consultants to complete PDI and RD/RA activities at the Site. The primary contacts and responsibilities associated with the project team members include:

1. Michael Marley, XDD – designing the treatment trench and associated components; hydraulic and fate and transport modeling.
2. Mary DeFlaun, GeoSyntec Consultants - evaluating ground water conditions and natural attenuation processes in the Eastern and Southern Plumes.

### **6.3 U.S. ENVIRONMENTAL AGENCY**

The Remedial Project Manager for USEPA is:

Darryl Luce  
Office of Site Remediation and Restoration  
Massachusetts Superfund Section  
US EPA Region 1  
One Congress Street, Suite 1100  
Mail Code HBO  
Boston, Massachusetts 02114-2023  
(617) 918-1336  
(617) 918-1294 (Fax)  
luce.darryl@epamail.epa.gov

#### **6.4 NH DEPARTMENT OF ENVIRONMENTAL SERVICES (NHDES)**

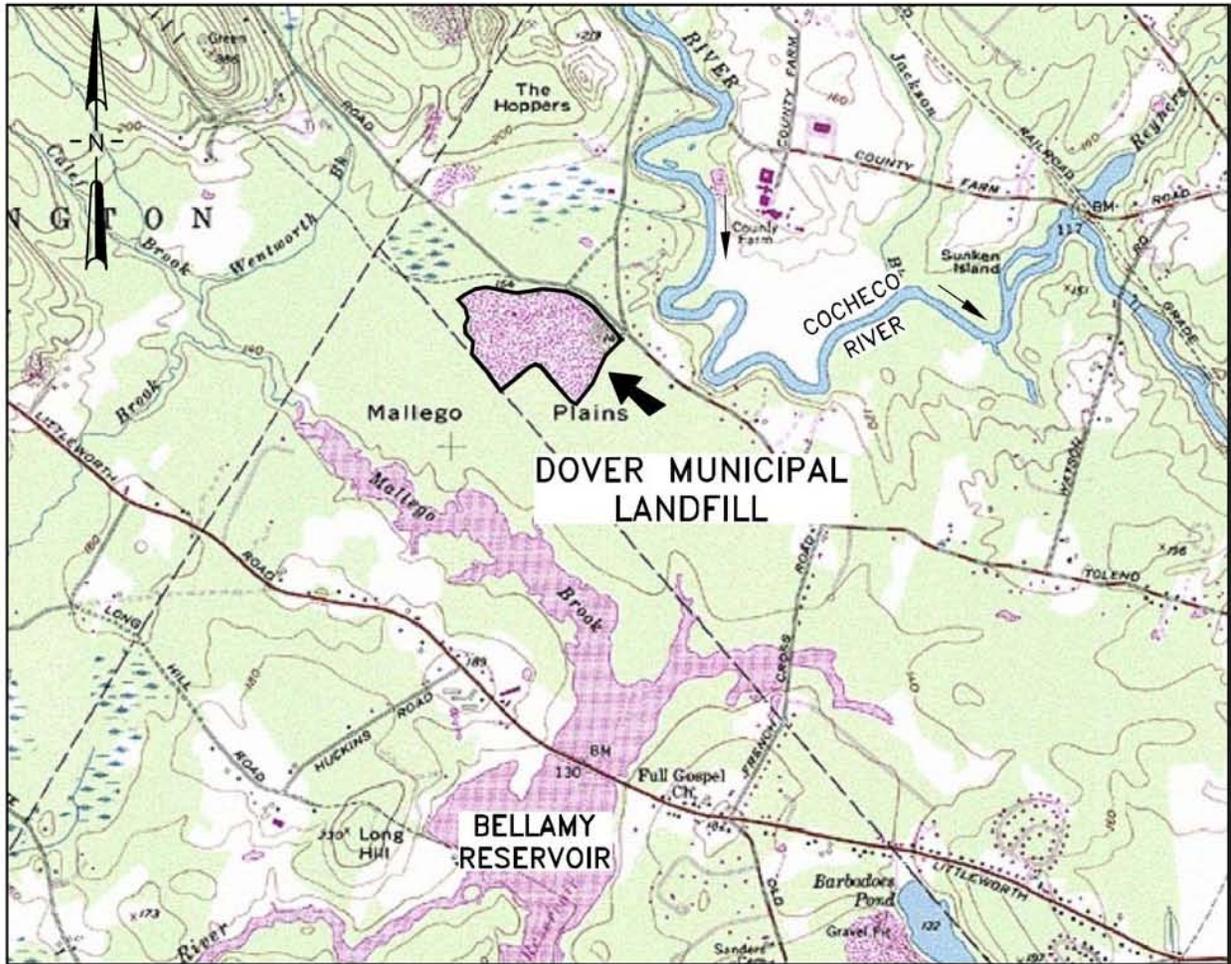
The Remedial Project Manager for NHDES is:

Andrew J. Hoffman, P.E.  
Waste Management Division  
New Hampshire Department of Environmental Services  
P.O. Box 95  
29 Hazen Drive  
Concord, New Hampshire 03302  
(603) 271-6778  
(603) 271-2456 (Fax)  
ahoffman@des.state.nh.us

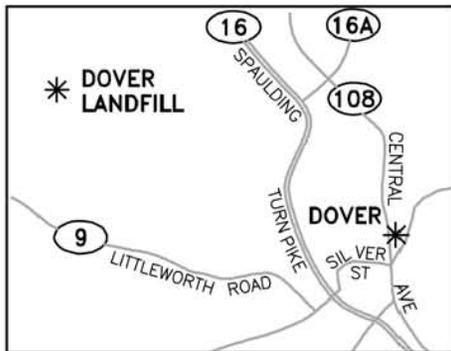
#### **6.5 SUBCONTRACTORS**

Subcontractors for the PDI and RD/RA will be competitively procured using the PDI and RD/RA Work Plans as the basis to scope the work. It is anticipated that subcontractors will be retained to provide, at a minimum, survey, analytical laboratory analysis, drilling and well installation, and test-pitting. All contractors and sub-contractors to be engaged in performing Work at the Site will be submitted for approval by USEPA as established in paragraphs 11 and 12 of the 1992 CD as amended by the ACD. Contact information will be provided when Work Plans are approved and subcontractor procurement is completed.

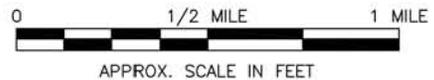
## **FIGURES**



SITE AREA PLAN



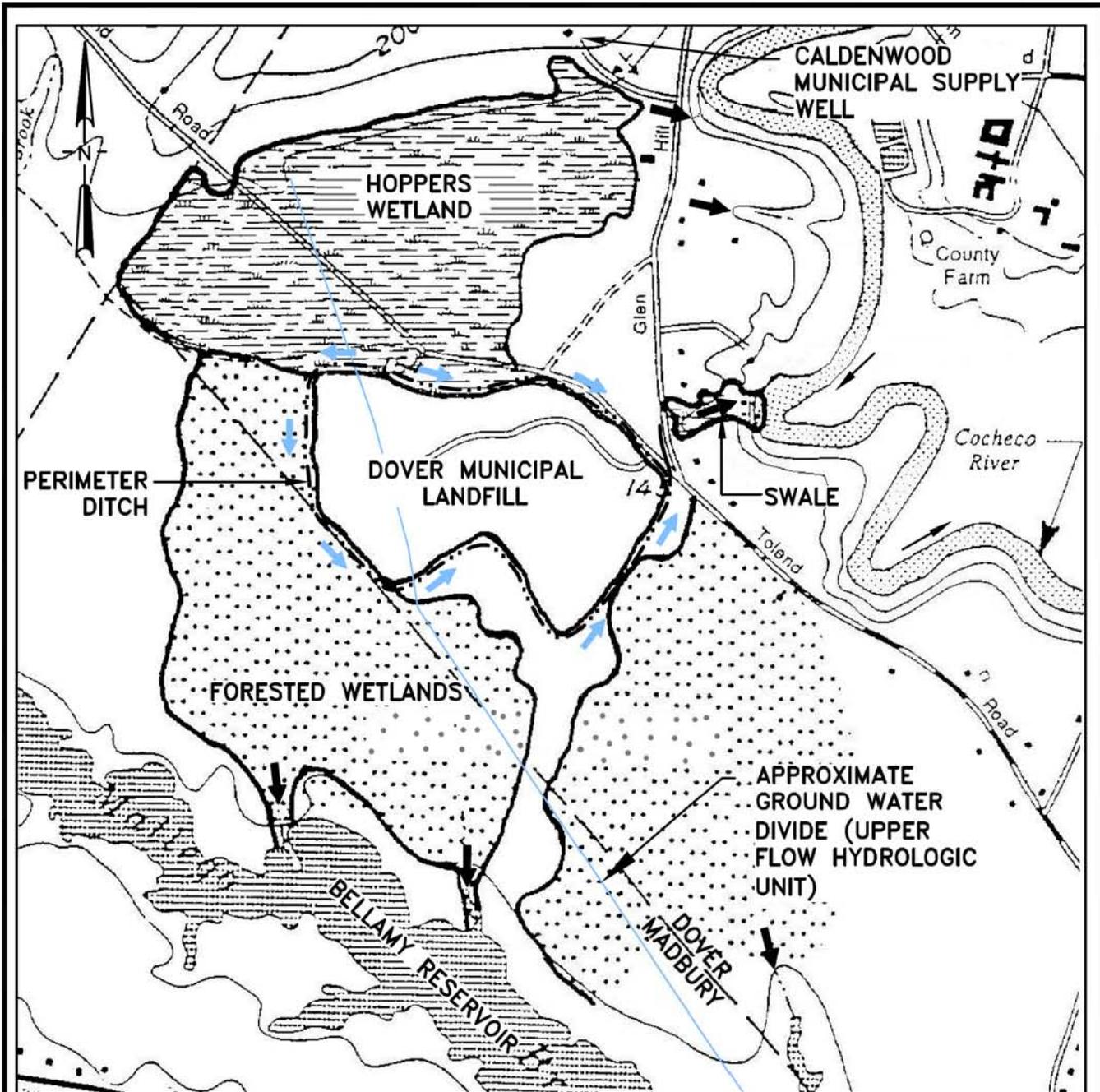
LOCUS MAP  
NOT TO SCALE



CONTOUR INTERVAL 20 FEET

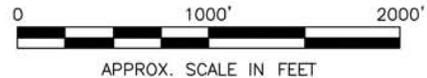
REFERENCE: TAKEN FROM USGS MAP "DOVER WEST, NH NW/4 15' QUADRANGLE, REVISED 1993.

		CLIENT: DOVER GROUP		
		PROJECT: DOVER LANDFILL DOVER, NEW HAMPSHIRE		
TITLE: SITE LOCUS				
DESIGNED: NLJ	DRAWN: NMV	CHECKED: NLJ	APPROVED: MJW	FIGURE:  1
SCALE: AS NOTED	DATE: 4/4/05	FILE NO.: 2009B105	PROJECT NO.: 2009-001	



**LEGEND**

- SURFACE WATER FLOW DIRECTION - PERIMETER DITCH
- SURFACE WATER FLOW DIRECTION - WETLAND AREAS



**NOTES:**

1. FIGURE IS BASED UPON FIGURE 2-7 OF GOLDER FEBRUARY 1995 PDI REPORT.

REFERENCE: BASE MAP TAKEN FROM USGS MAP 7.5 MINUTE QUADRANGLE "DOVER WEST, DATED 1956, PHOTO REVISED 1988.

		CLIENT: DOVER GROUP	
		PROJECT: DOVER LANDFILL SUPERFUND SITE DOVER, NEW HAMPSHIRE	
TITLE: SURFACE WATER FLOW DIRECTIONS			
DESIGNED: NLJ	DRAWN: NMV	CHECKED: NLJ	APPROVED: MJW
SCALE: AS NOTED	DATE: 3/25/05	FILE NO.: 2009B111	PROJECT NO.: 2009-001
			<p>FIGURE:</p> <p style="font-size: 2em;">2</p>

PLOT DATE: 4-5-05  
 FILE: I:\2009-04\2009-b111.dwg



(Insert Date)

(Insert Property Owner Name)

(Insert Street Address)

Dover, New Hampshire

Dear Property Owner,

This letter requests access to property located at (Insert address) to conduct investigations to support the environmental evaluations described below. Public records indicate that you are the current owner of the property.

An environmental investigation is underway associated with the Dover Municipal Landfill Superfund Site (the Site) located on Tolend Road in Dover, New Hampshire. The environmental investigation work is being conducted by GeoInsight, Inc. and is being supervised by the United States Environmental Protection Agency, Region 1, and the New Hampshire Department of Environmental Services. The purpose of this work, called Remedial Design/Remedial Action, is to collect samples of various media for laboratory analysis, which helps us to evaluate conditions at the landfill.

The proposed work at your property will likely include (insert describe nature of work), to be performed over a (insert anticipated timeframe) period. The results of the investigation will be used to help determine remedial actions that may be needed. We will provide you with the results of tests promptly after we receive them from the laboratory, and we will be available to discuss with you the results of tests conducted on your property. Attached is a figure showing the location(s) of work to be done on or in the vicinity of your property.

A representative of GeoInsight, Inc. will contact you in the near future to discuss this request with you and answer questions you may have about this request.

Thank you in advance for your cooperation in helping us assess conditions associated with the Dover Municipal Landfill Superfund site. If you have any questions in connection with this matter, please contact me at (978) 692-1114.

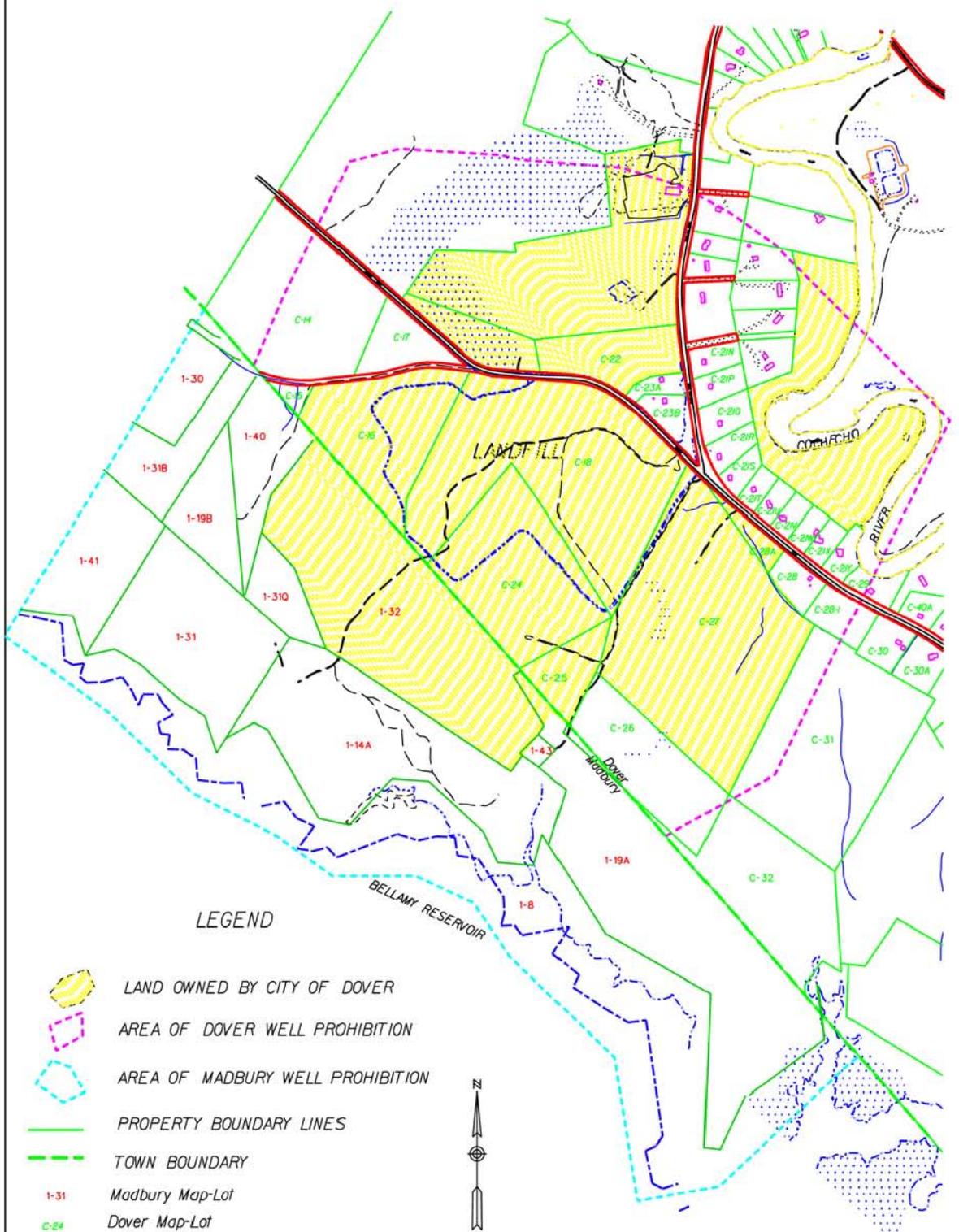
Sincerely,  
GEOINSIGHT, INC.

Michael J. Webster, P.G., L.S. P.  
Project Coordinator

cc: Darryl Luce, USEPA  
Andrew J. Hoffman, NHDES

Figure 4  
Sample Property Access Letter  
Site Management Plan  
Dover Municipal Landfill Superfund Site  
Dover, New Hampshire

# Map Of Land Use Institutional Controls Tolend Landfill



## LEGEND

-  LAND OWNED BY CITY OF DOVER
-  AREA OF DOVER WELL PROHIBITION
-  AREA OF MADBURY WELL PROHIBITION
-  PROPERTY BOUNDARY LINES
-  TOWN BOUNDARY
-  1-31 Madbury Map-Lot
-  C-24 Dover Map-Lot

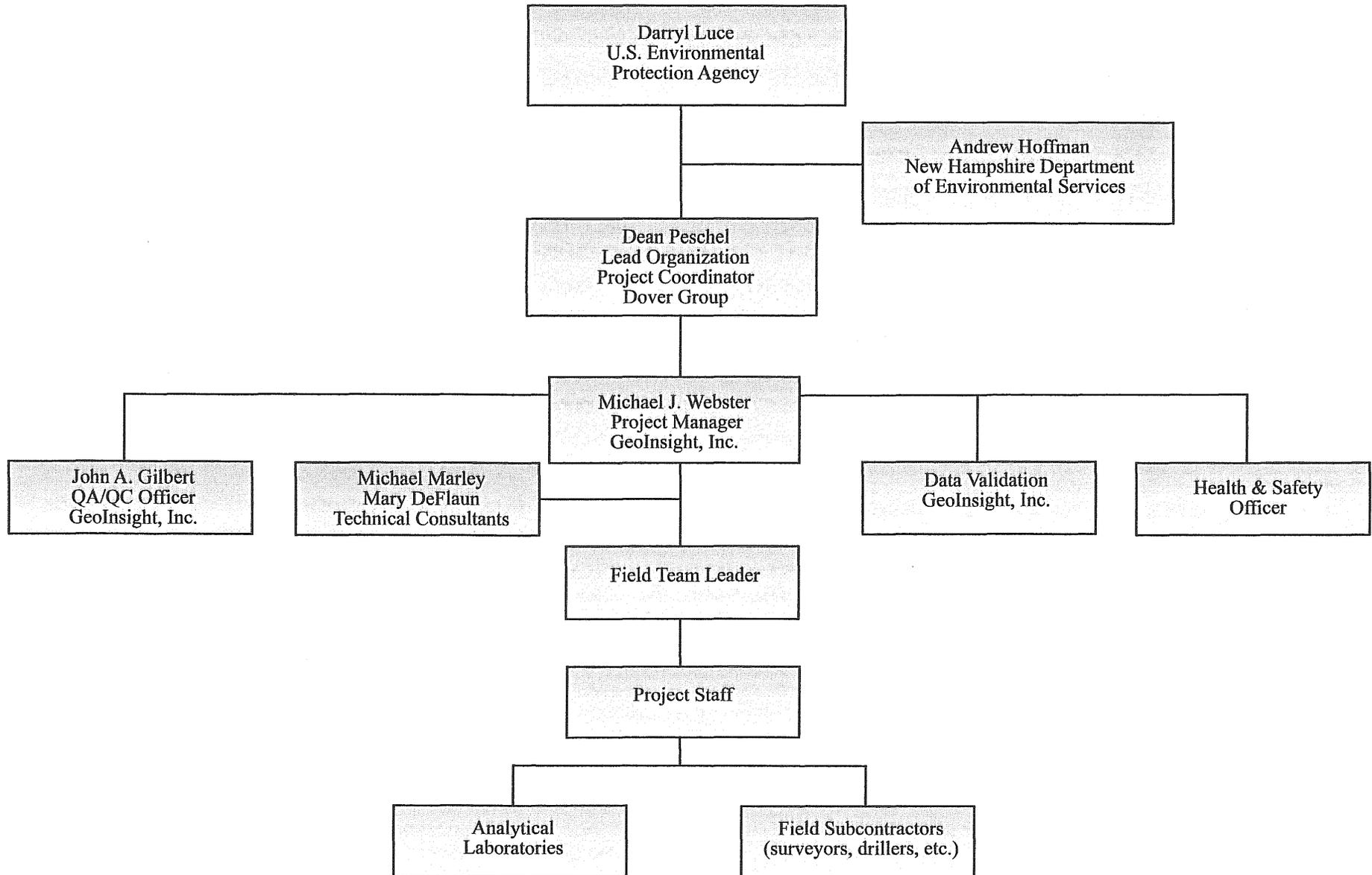


SCALE: 1" = 700'

Site Name: Dover Municipal Landfill  
Site Location: Dover, New Hampshire

Title: Site Management Plan  
Revision No.: 0  
Revision Date: 4/01/04

## FIGURE 6 PROJECT ORGANIZATION CHART



## TABLES

**TABLE 1  
 PRIVATE PROPERTY OWNER AND ADDRESS INFORMATION  
 DOVER MUNICIPAL LANDFILL SUPERFUND SITE  
 DOVER, NEW HAMPSHIRE**

Name (Last, First)	Owner Address	Town/City	State	Zip Code	Map-Lot
<b>DOVER PROPERTIES</b>					
Brox, Stephen	1471 Methuen St	Dracut	MA	01826	C-14
Dana Belden Inc.	2 Pearl Street	Dover	NH	03820	C-15, C-17
City of Dover	288 Central Ave	Dover	NH	03820	C-16, C-18, C-22, C-24, C-25, C-27, C-28A, 1-32
Beth Wagner	13 Glen Hill Road	Dover	NH	03820	C-21N
Cals P., Douglas	23 Glen Hill Road	Dover	NH	03820-5701	C-21P
Martin S., Lisa	19 Glen Hill Road	Dover	NH	03820	C-21Q
Corte B., Arthur TRUSTEE	81 Glen Hill Road	Dover	NH	03820	C-21R
Patten, Glenn C.	PO Box 373	Portsmouth	NH	03802	C-21S
Corte B., Arthur TRUSTEE	81 Glen Hill Road	Dover	NH	03820	C-21T
Dooda, Jane	581 Tolend Road	Dover	NH	03820	C-21U
Perkins, Bradley S.	575 Tolend Road	Dover	NH	03820	C-21V
Mathieu, Elizabeth A.	569 Tolend Road	Dover	NH	03820	C-21W
Demars, Susan L.	563 Tolend Road	Dover	NH	03820	C-21X
Cirinna, Matthew S.	557 Tolend Road	Dover	NH	03820	C-21Y
Sliwinski, Frederick P.	22 Glen Hill Road	Dover	NH	03820-5700	C-23A
Lemire Richard E.	16 Glen Hill Road	Dover	NH	03820	C-23B
Leighton, Warren and Ruth	162 Kreampoke Rd	Stewartstown	NH	03576	C-26
Webber, Philip	544 Tolend Road	Dover	NH	03820	C-28
Webber, Janet	50 Country Brook Estate	Rochester	NH	03867	C-28-1
Dickinson, Maureen and William	541 Tolend Rd	Dover	NH	03820	C-29
Buck, Timothy and Cynthia	532 Tolend Rd	Dover	NH	03820	C-30
Ulanosky, Julia and David	524 Tolend Rd	Dover	NH	03820	C-30A
Coen Amelia Revocable Trust	PO BOX 897	Atkinson	NH	03811-0897	C-31
Souther, Albert E.	225 Washington Street	Dover	NH	03820	C-32, 1-19A
Jeffrey Brown	531 Tolend Rd	Dover	NH	03820	C-40A
<b>MADBURY PROPERTIES</b>					
City of Portsmouth Public Works Dept	80 Peverly Hill Rd	Portsmouth	NH	03801	1-8
Gerald and Katherine Whitehouse	253 Littleworth Rd	Madbury	NH	03823	1-14A
Hale, William	245 Littleworth Rd	Madbury	NH	03823	1-19B
Major Waldron Sportsman's Association	P.O. Box 314	Barrington	NH	03825	1-30
Town of Madbury	13 Town Hall Rd	Madbury	NH	03820	1-31, 1-31A, 1-31B, 1-41
Daniels, Jim	11C Vine St	So. Berwick	ME	03908	1-40
Maria Pigeon	273 Littleworth Rd	Madbury	NH	03823	1-43

Site Name: Dover Municipal Landfill  
Site Location: Dover, New Hampshire

Title: Site Management Plan  
Draft Number : 0  
Revision Date: 4/01/2005

**TABLE 2**  
**PROJECT TEAM CONTACTS AND RESPONSIBILITIES**

<b>CONTRACTOR</b>	<b>RESPONSIBILITY</b>
<p><b>Xpert Design and Diagnostics, LLC</b> <i>Project Manager:</i> Michael Marley XDD 16 Marin Way Stratham, NH 03885 (603) 778-1100 ( 603) 778-2121 (Fax) <a href="mailto:Marley@xdd-llc.com">Marley@xdd-llc.com</a></p>	<p>Assist in preparation of PDI Work Plans. PDI activities associated with the air sparge treatment trench. Design of the AROD source control remedy. Computer modeling activities including hydraulic and fate and transport evaluations.</p>
<p><b>GeoSyntec Consultants</b> <i>Project Manager:</i> Mary DeFlaun GeoSyntec Consultants Research Park, 1 Airport Place Princeton, NJ 08540 (609) 688-8899 (609) 688-1999 (Fax) <a href="mailto:MDeFlaun@geosyntec.com">MDeFlaun@geosyntec.com</a></p>	<p>Assist in preparation of PDI Work Plans. Internal quality control and review of project deliverables. PDI activities associated with the Southern and Eastern Plumes. Monitored natural attenuation evaluation and associated monitoring activities.</p>