

EPA Region 1 - Longterm Stewardship Assessment Checklist

Updated August 11, 2016

Facility Details

Facility Name: Freudenberg NOK
Facility Address: 450 Pleasant Street
Facility City: Bristol
EPA ID: NHD001084672
Facility State: NH
Report Finalized: Yes
Finalized Date: 12/11/2018
Signature: Sebastian Rodriguez

PART I. PRE-ASSESSMENT CHECKLIST (IN-OFFICE REVIEW)

Date Pre-Assessment completed: 5/7/2018
Pre-Assessment performed by: Sebastian Rodriguez
Organization: EPA R1

A. Background Document Review

1. Current Human Exposures Under Control (CA 725)? **yes**
Date: 8/16/2006
Comments:
2. Migration of Contaminated Groundwater Under Control (CA 750)? **yes**
Date: 5/29/2008
Comments:
3. Final Remedy Decision Achieved (CA 400)? **yes**
Date: 9/1/2007
Comments: The remedy decision was made in an iterative process and incorporated several measures (detailed below).
4. Remedy Construction Complete (CA 550)? **yes**
Date: 9/1/2007
Comments: Remedial measures implemented at the site include two SVE Systems, a groundwater extraction system, and contaminant source removal (excavation), all paired with monitoring.
5. Groundwater classification at and surrounding site:
All groundwater in New Hampshire is considered a potential drinking water source and must meet the Ambient Groundwater Quality Standards. There are no separate classifications for urban or industrial groundwater.
6. Does the site have an active treatment or containment system in operation, or should be in operation as part of an EC? **yes**
Comments:

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7. Does the site have a long-term monitoring program in place? (ex. CT DEEP Long-Term Stewardship Permit) **yes**

Comments: NHDES Groundwater Management Permit

8. Is the Site located within the EPA-defined Environmental Justice Area? (see EPA EJ Screening Tool) **no**

Comments:

9. Other Pre-Assessment documents reviewed:

Year 2017 Annual Summary Report

B. Engineered and Institutional Controls (EC/ICs)

EC/IC Name: NHDES Groundwater Management Permit

Control Type: IC

Control Description:

Map of control boundary available? **yes**

Copy of IC recorded on deed or EC engineering plan available? **yes**

Reference(s): Year 2017 Annual Summary Report

EC/IC Name: Pump and Treat System

Control Type: EC

Control Description:

Map of control boundary available? **yes**

Copy of IC recorded on deed or EC engineering plan available? **yes**

Reference(s): Year 2017 Annual Summary Report

EC/IC Name: Soil Vault SVE System

Control Type: EC

Control Description:

Map of control boundary available? **yes**

Copy of IC recorded on deed or EC engineering plan available? **yes**

Reference(s): Year 2017 Annual Summary Report

EC/IC Name: Soil Enclosure SVE System

Control Type: EC

Control Description: Also known as the "baggie area".

Map of control boundary available? **yes**

Copy of IC recorded on deed or EC engineering plan available? **yes**

Reference(s): Year 2017 Annual Summary Report

C. State/Municipal Regulatory Notification and Information

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Indicate whether a State or Municipal regulatory agency was notified about the upcoming assessment, and describe any information provided by that agency related to the assessment.

Agency: NHDES
Name: David Bowen
Phone: 603-271-2800
Email: DAVID.BOWEN@DES.NH.GOV
Info Obtained: Site status, regulatory history

D. Climate Change Module

Are remedies susceptible to climate change impacts (see RCRA Corrective Action Facility GIS map and/or the EPA Climate Vulnerability Analysis)?

The northern portion of the property is approximately 150 feet away from a 100 year flood zone due to proximity to the Newfound River. This zone has been assigned the flood hazard chance code "A", meaning that it requires flood insurance for a mortgage.

E. Constituents of Concern

What are the Constituents of Concern (COCs) at the site?

Note: Add details from file review and confirm COC results during site visit.

TCE, Cis-1,2-DCE, Trans-1,2-DCE, 1,1-DCA, 1,1-DCE, 1,1,1-TCA, VC, 1,2-Dichlorobenzene, 1,4-Dichlorobenzene, PCE, Various PAHs, BTEX

F. Renewable Energy

Does the site appear suitable for renewable energy? Note: complete PVMapper.org app, then verify information at site visit

The site appears to have some potential for renewable energy. The main facility building seems to have a mostly flat roof and there is some limited open space in the north of the property.

G. Additional Pre-Assessment Comments

PART II. Site Visit Information

Use this section to record site-specific information observed during the assessment. Attach photographs to the template at the end of this checklist.

A. Site Assessment Introduction

Assessment performed by: Sebastian Rodriguez

Organization: EPA_R1

Visit date: 5/16/2018

Start time: 10:00

End time: 12:00

Weather conditions (temp., sunny, rain, etc.): Sunny, warmer (mid 60s F°), and slightly windy

Site setting (residential, industrial, mixed, etc.): Rural

Additional introductory comments:

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B. Site Visit Attendees

Name: Rene Last Name: Levfebre
Role/Affiliation: Facilities Manager
Organization: Freudenberg
Type: Owner
Address: 450 Pleasant Street Phone Number: (603) 744-0371
Address 2: Fax: --
City: Bristol
Email: rene.lefebvre@fnst.com
State: NH
Zip Code: 03222

Name: Letty Last Name: Towne
Role/Affiliation:
Organization: Freudenberg
Type: Owner
Address: 450 Pleasant Street Phone Number: (603) 744-0371
Address 2: Fax:
City: Bristol
Email:
State: NH
Zip Code: 03222

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Name: Tanya Last Name: Justham
Role/Affiliation: Project Manager
Organization: GZA
Type: SiteAttendee
Address: 5 Commerce Park North, Suite 201 Phone Number: 111-111-111
Address 2: Fax:
City: Bedford
Email: tanya.justham@gza.com
State: NH
Zip Code: 03110

Name: David Last Name: Bowen
Role/Affiliation:
Organization: NHDES
Type: SiteAttendee
Address: 29 Hazen Drive Phone Number: 603-271-2800
Address 2: Fax:
City: Concord
Email: DAVID.BOWEN@DES.NH.GOV
State: NH
Zip Code: 03301

Describe any concerns or comments from the site visit attendees:

C. Site Use and Activities

1. What is the current site use? Site is currently an operating facility used for the manufacturing of automobile gaskets and springs.
2. Is the current site use consistent with EC/IC restrictions? yes
Comment:
3. Has the property transferred ownership or operator since the remedy was established? no
Comment:
- 3a. Provide any additional details about the new operator/owner, including activities performed by the new operator/owner:
4. Are there any known plans for future transfer? (if Yes, provide time frame) no

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Comment:

5. Is the planned future use consistent with the EC/ICs and restrictions? **yes**

Comment:

6. Is there any new development on an EC/IC area? **no**

Comment:

7. Is underlying groundwater used by the site or nearby entities? (If Yes, describe uses) **no**

Comment:

8. Are there Sensitive Receptors (human and/or ecological) at the Site? (e.g. daycare, wetlands, TE species and/or habitat, etc.) **yes**

Comment: The facility is immediately adjacent to a tributary to the Smith River.

D. Climate Change Module

Have site representatives considered adaptation measures and planned for extreme events or other climate change impacts? What has been done or what adaptation measures does the facility plan on implementing at the site, and why?

Facility has not considered climate change adaptation measures.

Part III. Institutional Controls Review and Assessment

Use this section for site-specific assessment findings on the ICs identified in Parts I and II. If needed, use a separate sheet for each unique IC at this site.

A. Basic Information

1. Common name of this IC? (ex. "Parking Lot A deed restriction") **Groundwater Management Zone**

2. What type of IC is this? (Select from drop-down list or write-in) **Government**

Specify If Other:

Category: **Groundwater Use Restriction** Mechanism: **other**

Specify: **NHDES Groundwater Management Permit**

3. Is a map of this IC available?(If Yes, please attach) **yes**

4. Is a copy of the IC document (e.g. copy of a deed restriction) available at the site, municipality, state, or on-line? (If Yes, please attach) **yes**

5. Attach a geotagged photograph and describe the general location of this IC: (Note: photolog attachment page is at end of form)

B. Specific IC LTS Information

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1. Has the IC specified in the CA Remedy been fully implemented and constructed in accordance with any applicable plans and schedule? **yes**

Comments:

2. Does the IC provide control for the entire extent of contamination (entire site or a specific portion thereof)? **yes**

Comments:

3. Does the IC eliminate or reduce exposure of all potential receptors to known contamination as intended? **yes**

Comments:

4. Is the IC being maintained as required by the CA Remedy to ensure that the control remains effective? **yes**

Comments:

5. Are modifications to the existing IC needed? **no**

Comments:

6. Are additional ICs needed to achieve the protectiveness objectives as intended? **other**

Comments: **Possibility for an AUR to protect from contaminated soil disturbance.**

7. Does the Remedy require IC assessment? If so, what is the assessment frequency, who performs the assessment, and who receives the assessment report? **no**

8. Describe and include any additional information about this IC provided by the site representative(s) during the assessment:

Additional Comments:

Ground water is sampled biannually.

Part IV. Engineered Controls (EC) Review and Assessment

Use this section for site-specific assessment findings on the ECs identified in Parts I and II. If needed, use a separate sheet for each unique EC at this site.

A. Basic Information

1. Common name of this EC? **Soil Vault SVE**

2. What type of EC is this? **Soil Extraction System**

3. Is a map of this EC available? (If Yes, please attach) **yes**

4. Are design and as-built plans available for this EC? (If Yes, please attach) **yes**

5. Attach a geotagged photograph and describe the general location of this EC: **Fenced-off north west portion of western parking lot.**

6. Additional comments about this EC:

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B. Specific EC LTS Information

- | | |
|--|-----|
| 1. Has the EC specified in the CA Remedy been fully implemented and constructed in accordance with any applicable plans and schedule? | yes |
| Comment: | |
| 2. Is this EC fully intact? | yes |
| Comment: | |
| 3. Is any damage to the EC visible? | no |
| Comment: | |
| 4. Have repairs to this EC been necessary? (if Yes, provide general description in comments) | no |
| Comment: | |
| 5. Does this EC provide control for the entire extent of contamination (horizontal and vertical)? | yes |
| Comment: | |
| 6. Is this EC effective at reducing contaminant migration? Is data available to provide supporting evidence? | yes |
| 7. Does this EC eliminate or mitigate exposures to all of the potential receptors that the EC was designed to protect? | yes |
| Comment: | |
| 8. Does this EC sufficiently meet the risk goals and applicable standards specified in the CA Remedy? | yes |
| Comment: | |
| 9. Is the EC effective and reliable for the activities (current and proposed future) conducted at the site? | yes |
| Comment: | |
| 10. Is the EC effective and reliable for the climate (current and future) at the site? | yes |
| Comment: | |
| 11. Is the EC reliable for the time period it was designed to be protective of? | yes |
| Comment: | |
| 12. Is the EC monitored and maintained as required by the OM Plan (or agreement developed in accordance with the CA Remedy) to ensure the control remains effective? | yes |

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Comment:

13. Who is responsible for OM of the EC?

Freudenberg

14. What is the OM reporting frequency?

Annual

15. Who receives the OM reports?

NHDES

16. Describe and include any additional information about this EC provided by the site during the assessment:

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A. Basic Information

1. Common name of this EC? **Baggie Area Cap**
2. What type of EC is this? **PhysicalCap**
3. Is a map of this EC available? (If Yes, please attach) **yes**
4. Are design and as-built plans available for this EC? (If Yes, please attach) **no**
5. Attach a geotagged photograph and describe the general location of this EC: **Center of western parking lot**
6. Additional comments about this EC:
Not captured in pre- assessment phase.

B. Specific EC LTS Information

1. Has the EC specified in the CA Remedy been fully implemented and constructed in accordance with any applicable plans and schedule? **yes**
Comment:
2. Is this EC fully intact? **yes**
Comment:
3. Is any damage to the EC visible? **yes**
Comment: **Slight damage to baggie cover due to a tornado that passed through the area.**
4. Have repairs to this EC been necessary? (if Yes, provide general description in comments) **yes**
Comment: **See above answer for #3. Repairs to baggie area underway.**
5. Does this EC provide control for the entire extent of contamination (horizontal and vertical)? **yes**
Comment:
6. Is this EC effective at reducing contaminant migration? Is data available to provide supporting evidence? **yes**
7. Does this EC eliminate or mitigate exposures to all of the potential receptors that the EC was designed to protect? **yes**
Comment:
8. Does this EC sufficiently meet the risk goals and applicable standards specified in the CA Remedy? **yes**
Comment:
9. Is the EC effective and reliable for the activities (current and proposed future) conducted at the site? **yes**
Comment:

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10. Is the EC effective and reliable for the climate (current and future) at the site? yes

Comment:

11. Is the EC reliable for the time period it was designed to be protective of? yes

Comment:

12. Is the EC monitored and maintained as required by the OM Plan (or agreement developed in accordance with the CA Remedy) to ensure the control remains effective? yes

Comment:

13. Who is responsible for OM of the EC?
Freudenberg

14. What is the OM reporting frequency?

Annual

15. Who receives the OM reports?

NHDES

16. Describe and include any additional information about this EC provided by the site during the assessment:
Soil enclosure AOC ("the baggie") may see additional remediation in the future as the company is interested in potential expansion in this area.

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A. Basic Information

1. Common name of this EC? **Groundwater Treatment System**
2. What type of EC is this? **Groundwater Recovery System**
3. Is a map of this EC available? (If Yes, please attach) **yes**
4. Are design and as-built plans available for this EC? (If Yes, please attach) **yes**
5. Attach a geotagged photograph and describe the general location of this EC: **Inside a designated shed.**
6. Additional comments about this EC:
Receives and treats contamination from groundwater recovery system and baggie area SVE system.

B. Specific EC LTS Information

1. Has the EC specified in the CA Remedy been fully implemented and constructed in accordance with any applicable plans and schedule? **yes**
Comment:
2. Is this EC fully intact?
Comment:
3. Is any damage to the EC visible? **no**
Comment:
4. Have repairs to this EC been necessary? (if Yes, provide general description in comments) **yes**
Comment: **New recovery wells installed to increase the capture zone of the system.**
5. Does this EC provide control for the entire extent of contamination (horizontal and vertical)? **yes**
Comment:
6. Is this EC effective at reducing contaminant migration? Is data available to provide supporting evidence? **yes**
7. Does this EC eliminate or mitigate exposures to all of the potential receptors that the EC was designed to protect? **yes**
Comment:
8. Does this EC sufficiently meet the risk goals and applicable standards specified in the CA Remedy? **yes**
Comment:
9. Is the EC effective and reliable for the activities (current and proposed future) conducted at the site? **yes**
Comment:

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10. Is the EC effective and reliable for the climate (current and future) at the site? yes

Comment:

11. Is the EC reliable for the time period it was designed to be protective of? yes

Comment:

12. Is the EC monitored and maintained as required by the OM Plan (or agreement developed in accordance with the CA Remedy) to ensure the control remains effective? yes

Comment:

13. Who is responsible for OM of the EC?

Freudenberg

14. What is the OM reporting frequency?

Annually

15. Who receives the OM reports?

NHDES

16. Describe and include any additional information about this EC provided by the site during the assessment:

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A. Basic Information

1. Common name of this EC? **Baggie Area SVE**
2. What type of EC is this? **Soil Extraction System**
3. Is a map of this EC available? (If Yes, please attach) **yes**
4. Are design and as-built plans available for this EC? (If Yes, please attach) **yes**
5. Attach a geotagged photograph and describe the general location of this EC: **Center of western parking lot**
6. Additional comments about this EC:

B. Specific EC LTS Information

1. Has the EC specified in the CA Remedy been fully implemented and constructed in accordance with any applicable plans and schedule? **yes**
Comment:
2. Is this EC fully intact? **yes**
Comment:
3. Is any damage to the EC visible? **no**
Comment:
4. Have repairs to this EC been necessary? (if Yes, provide general description in comments) **no**
Comment:
5. Does this EC provide control for the entire extent of contamination (horizontal and vertical)? **yes**
Comment:
6. Is this EC effective at reducing contaminant migration? Is data available to provide supporting evidence? **yes**
7. Does this EC eliminate or mitigate exposures to all of the potential receptors that the EC was designed to protect? **yes**
Comment:
8. Does this EC sufficiently meet the risk goals and applicable standards specified in the CA Remedy? **yes**
Comment:
9. Is the EC effective and reliable for the activities (current and proposed future) conducted at the site? **yes**
Comment:

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10. Is the EC effective and reliable for the climate (current and future) at the site? yes

Comment:

11. Is the EC reliable for the time period it was designed to be protective of? yes

Comment:

12. Is the EC monitored and maintained as required by the OM Plan (or agreement developed in accordance with the CA Remedy) to ensure the control remains effective? yes

Comment:

13. Who is responsible for OM of the EC?

Freudenberg

14. What is the OM reporting frequency?

Annual

15. Who receives the OM reports?

NHDES

16. Describe and include any additional information about this EC provided by the site during the assessment:

Part V. General Summary/ Additional Comments

Use this section for site-specific assessment findings on the ECs identified in Parts I and II. If needed, use a separate sheet for each unique EC at this site.

Table 1. Monitoring Station Assessment (inspect locations where monitoring occurs, if applicable)

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Station: RW-1LR
 Type: Recovery Well
 Latitude: 43.5852850500041 Longitude: -71.7540142314249
 Accuracy: Condition: Good
 Comment:

Station: RW-3R, RW-4R
 Type: Recovery Wells (2)
 Latitude: 43.5852356187957 Longitude: -71.7542182073432
 Accuracy: Condition: Good
 Comment: Recently replaced

Station: RW-2R, RW-6, RW-2RA
 Type: Two recovery wells, one monitor
 Latitude: 43.5847460169205 Longitude: -71.7540390655849
 Accuracy: Condition: Good
 Comment: RW-2RA is a monitoring well, even though it's named RW". "

Station: SB-19D
 Type: Monitoring well
 Latitude: 43.5849289543642 Longitude: -71.7518177899494
 Accuracy: Condition: Good
 Comment: Only installed during characterization. Not currently sampled.

Table 2. Solar Energy Re-Powering Screening

As part of Long Term Stewardship efforts, EPA offers basic solar energy re-powering screening capabilities for properties subject to corrective action under RCRA. Screening parameters for this site are listed below, and the site has been assigned a final score of either “Good” or “Poor” candidate for solar. EPA offers this assessment as a courtesy and does not intend for it to take the place of a formal solar suitability assessment. Designation as a “Good” or “Poor” candidate does not necessarily indicate that a property is entirely fit or unfit for solar panel construction. Further information regarding area-specific government incentives for renewable re-powering may be found at <http://www.dsireusa.org/>.

SiteID NHD001084672

Usable Space (in acres) 45

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| | | |
|--|----------------|---|
| Distance to Transmission Lines (in miles) | 1.71 | EPA Re-Powering Google Earth Data Layer |
| Distance to Road (in miles) | 0 | EPA Re-Powering Google Earth Data Layer |
| Distance to Substation (in miles) | 1.70 | EPA Re-Powering Google Earth Data Layer |
| Distance to Urban Center (in miles) | 7.98 | EPA Re-Powering Google Earth Data Layer |
| Solar Resource (kWh/m2/day) | 3.91 | EPA Re-Powering Google Earth Data Layer |
| Sensitive Wildlife within 5 miles? | Yes | PVMapper.org |
| Other Solar Plants Nearby? | No | PVMapper.org |
| Wetland Proximity (in miles)? | 1 | PVMapper.org |
| Recreational Proximity (in miles) | 0.8 | PVMapper.org |
| Owner Interest? (Yes/No) | Yes | |
| Community Interest? (Yes/No) | Unknown | |
| Site free of restrictions that would preclude solar? | Yes | |
| Retail Price of Electricity in area? (in cents/kWh) | 15.66 | |
| Overall Re-Powering Tool Outcome (Good Candidate) | Good Candidate | EPA Re-Powering Tool |

Photograph Log

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Photo 1. Soil Vault SVE System



Photo 2. Baggie Area/Physical Cap



Photo 3. Recovery Well RW-1LR

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Photo 4. Monitoring wells RW-3R, RW-4R.



Photo 5. Pump and Treat System.



Photo 6. Monitoring wells RW-2R, RW-6, RW-2RA

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Photo 7. Monitoring Well SB-19D

Site ID: NHD001084672
Facility Name: Freudenberg_NOK
Address: 450_Pleasant_Street
City: Bristol
State: NH

Acronyms

CA Remedy – Corrective Action Remedy
CT DEEP – Connecticut Department of Energy and Environmental Protection
EC – Engineered Control
EI CA 725 – RCRA Corrective Action Environmental Indicator RCRIS Code 725, Current Human Exposure Under Control
EI CA 750 – RCRA Corrective Action Environmental Indicator RCRIS Code 725, Migration of Contaminated Groundwater Under Control
EJ – Environmental Justice
GIS – Geographic Information System
IC – Institutional Control
LTS – Long-Term Stewardship
OM Plan – Operations and Maintenance Plan
RCRA – Resource Conservation and Recovery Act
TE Species – Threatened and Endangered Species

Attachments

Document Title Freudenberg Nok Long Term Stewardship Assessment Photos

SEMS Link <https://sempub.epa.gov/src/document/01/100010383.pdf>

Document Title Freudenberg Nok Groundwater Permit Renewal

SEMS Link <https://sempub.epa.gov/src/document/01/100010470.pdf>

Document Title Freudenberg Nok As-Built Drawings

SEMS Link <https://sempub.epa.gov/src/document/01/100010471.pdf>



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

EMAIL ONLY

April 1, 2016

Rene Lebfreuve
Freudenberg-NOK General Partnership
450 Pleasant Street
Bristol, NH 03222

Subject: **Bristol** – Freudenberg-NOK Sealing Technologies Site, 450 Pleasant Street, DES Site #198706012, Project #294

Application for Groundwater Management Permit Renewal, prepared by GZA GeoEnvironmental, Inc., dated February 8, 2016

2015 Annual Summary Report, prepared by GZA GeoEnvironmental, Inc., dated January 29, 2016

Financial Assurance Extension Request, prepared by Freudenberg-NOK, dated March 17, 2016

Dear Mr. Lebfreuve:

Please find enclosed Groundwater Management Permit Number **GWP-198706012-B-005**, 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.

All monitoring summaries and all required sampling results shall be submitted to the Groundwater Management Permits Coordinator at the address below. All correspondence must contain a cover letter that clearly shows the Department identification number for the site (DES Site #198706012, Project #294).

ANNUAL REPORT

The Department has reviewed the subject 2015 Annual Summary Report (Annual Report). The Annual Report is complete and meets the requirements detailed in Groundwater Management Permit GWP-198706012-B-004 (Permit) issued January 31, 2011.

The Department concurs with the recommended course of action for continued groundwater monitoring and operation of the remedial systems in accordance with the renewed Permit.

FINANCIAL ASSURANCE

The Department has reviewed the Annual Remedial Cost Estimate and approves the 30-year remedial cost estimate of \$2,105,914. The Department has received the request for a 30-day extension for the submittal of the financial assurance mechanism that was due on March 15, 2016. The Department approves a one-time extension for the submittal. Submit the financial assurance mechanism to the Department by April 15, 2016.

DES Web Site: www.des.nh.gov


P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-2908 Fax: (603) 271-2181 TDD Access: Relay NH 1-800-735-2964

Rene Lebfreve
Site #198706012
April 1, 2016
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Should you have any questions, please contact me at the Waste Management Division.

Sincerely,



David C. Bowen, P.G.
Hazardous Waste Remediation Bureau
Tel: (603) 271-2800
Fax: (603) 271-2181
Email: david.bowen@des.nh.gov

ec: Karlee Kenison, P.G., HWRB/DES
James Wieck, GZA GeoEnvironmental, Inc.
Attention Health Officer, Town of Bristol



The
NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
hereby issues
GROUNDWATER MANAGEMENT PERMIT NO. GWP-198706012-B-005
to the permittee
FREUDENBERG-NOK GENERAL PARTNERSHIP
to monitor the past discharge of
Volatile Organic Compounds
at
FREUDENBERG-NOK SEALING TECHNOLOGIES
(450 Pleasant Street)
in BRISTOL, N.H.
via the groundwater monitoring system comprised of
18 monitoring wells
as depicted on the Site Plan entitled
Site Plan
dated January 2016, prepared by GZA GeoEnvironmental, Inc.

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

Date of Issuance: April 1, 2016
Date of Expiration: March 31, 2021

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-Or 600) 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 result 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 renewal of this permit prior to its expiration date but no more than 90 days prior to expiration.
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 permit 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-Or 600, 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 Waste Management Division no later than 45 days after sampling. Samples shall be taken from monitoring wells and surface water sampling points as shown and labeled on the referenced site plan and listed on the following table in accordance with the schedule outlined herein:

| Monitoring Locations | Sampling Frequency | Parameters |
|---|----------------------------|--|
| <i>Upper Aquifer Wells:</i> MW-2, PS-2S, GZ-302, GZ-307U, GZ-510U, GZ-511 | April & November each year | NHDES Waste Management Division Full List of Analytes for Volatile Organics (Full List for VOCs) and Static Water Levels |
| <i>Lower Aquifer Wells</i> PS-21D, MW-5D, MW-7D | November each year | Full List for VOCs and Static Water Levels |
| MW-4D, MW-10D, PS-1D, MK-37DR, MK-42D, TW-20L, GZ-307L, GZ-308, GZ-510L | April & November each year | Full List for VOCs and Static Water Levels |
| <i>Surface Water Station:</i> SS-8 | April & November each year | Full List for VOCs |

Sampling shall be performed in accordance with the documents listed in Env-Or 610.02 (e). Samples shall be analyzed by a laboratory certified by the U.S. Environmental Protection Agency or the New Hampshire Department of Environmental Services pursuant to Env-C 300.

(continued)

GWP-198706012-B-005

Summaries of water quality shall be submitted annually to the Department's Waste Management Division, in the month of January, using a format acceptable to the Department. The Summary Report shall include the information listed in Env-Or 607.04 (a), as applicable.

The Annual Summary 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 Renewal Application dated February 3, 2016, 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 beyond the Groundwater Management Zone boundary, the permittee shall notify the Department in writing. Within 60 days of discovery, the permittee shall submit recommendations to correct the violation. The Department shall approve the recommendations if the Department determines that they will correct the violation.
10. All monitoring wells at the site shall be properly maintained and secured from unauthorized access or surface water infiltration.

SPECIAL CONDITIONS FOR THIS PERMIT

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

| Tax Map / Lot No. | Property Address | Owner Name and Address | Deed Reference (Book / Page) |
|---|--|--|-------------------------------------|
| Bristol 225/2 Alexandria 418/161 | 450 Pleasant Street Bristol, NH 03222 | Freudenberg-NOK General Partnership 450 Pleasant Street Bristol, NH 03222 | 1812/247-253 |

12. The permittee shall update ownership information required by Env-Or 607.03(a)(20) for all properties within the Groundwater Management Zone prior to renewal of the permit or upon a recommendation for site closure.

13. **FINANCIAL ASSURANCE**

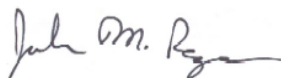
Freudenberg-NOK General Partnership must provide financial assurance in accordance with Env-Or 606.20, Financial Assurance.

Submit in January of each year, along with the Annual Summary Report, a detailed written estimate of the cost of hiring a third party to perform the remaining remedial tasks and an approved financial assurance mechanism to address these tasks.

14. **PERFORMANCE STANDARDS**

A periodic assessment of the performance of the remediation system shall be documented in the Annual Report and submitted to the Department each January.

The effectiveness of the upper and lower aquifer groundwater treatment system shall be routinely evaluated via a trend analyses of the Volatile Organic Compound (VOC) levels 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 that enter the upper and lower aquifer VOC source area terminate at the respective recovery well.

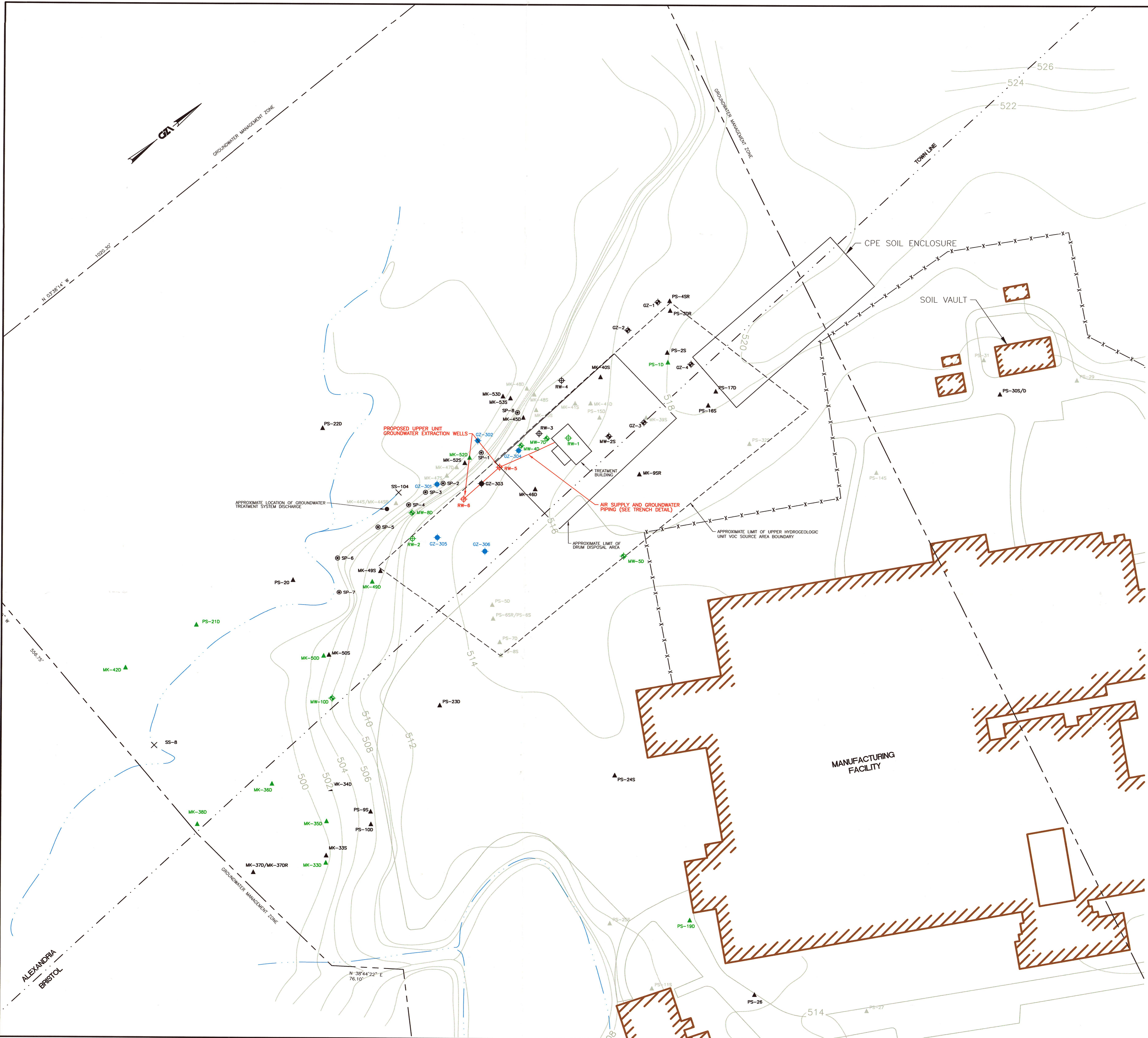


John M. Regan, P.G., Administrator
Hazardous Waste Remediation Bureau
Waste Management Division

Any person aggrieved by any terms or conditions of this permit may appeal to the N.H. Waste Management Council ("Council") by filing an appeal that meets the requirements specified in RSA 21-O:14 and the rules adopted by the Council, Env-WMC 200. The appeal must be filed **directly with the Council within 30 days** of the date of this decision and must set forth fully **every ground** upon which it is claimed that the decision complained of is unlawful or unreasonable. Only those grounds set forth in the notice of appeal can be considered by the Council.

Information about the Council, including a link to the Council's rules, is available at <http://nhec.nh.gov/> (or more directly at <http://nhec.nh.gov/waste/index.htm>). Copies of the rules also are available from the DES Public Information Center at (603) 271-2975.

GWP-198706012-B-005



LOCUS PLAN
(SCALE 1:24,000)

NOTES:

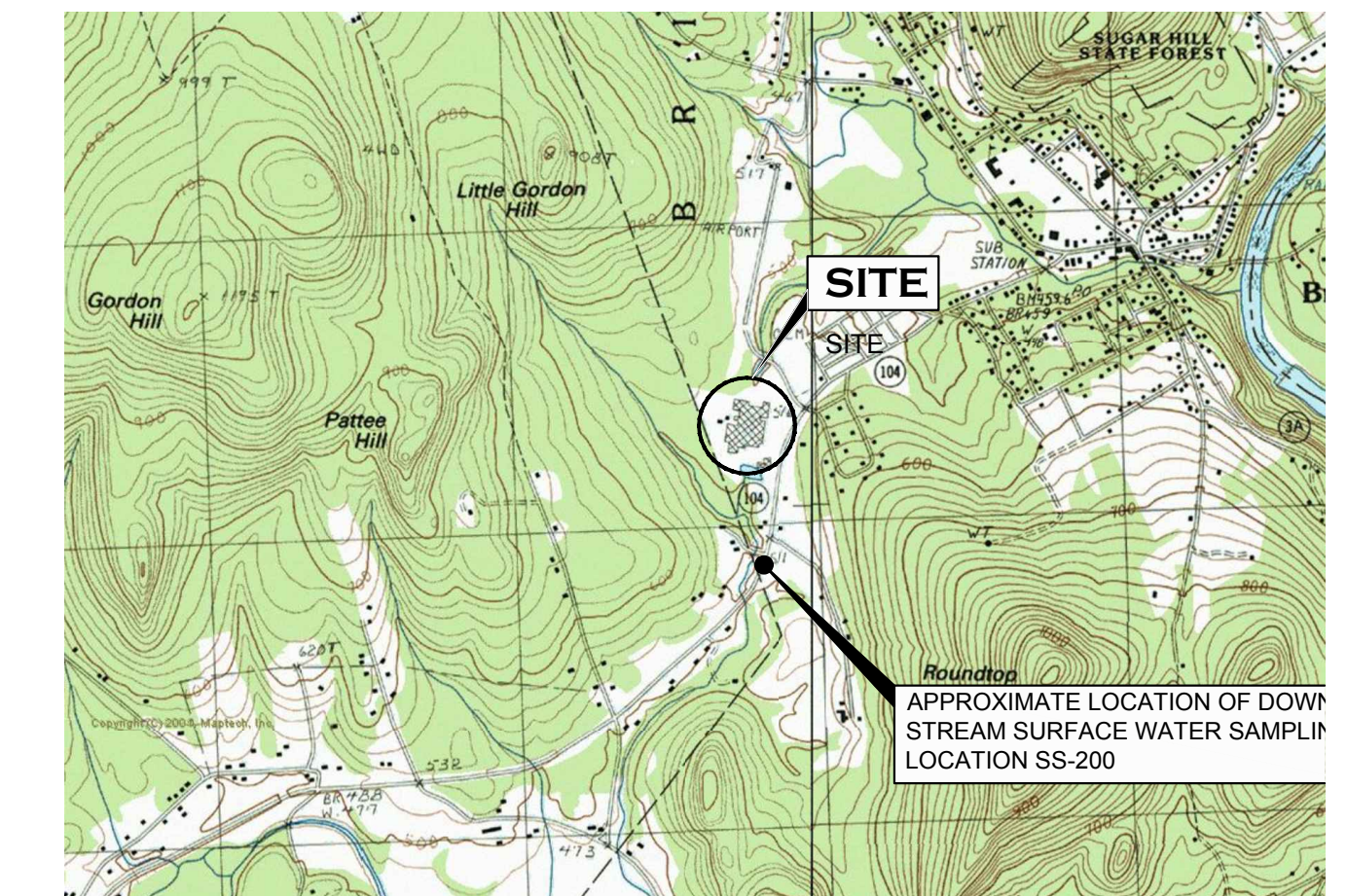
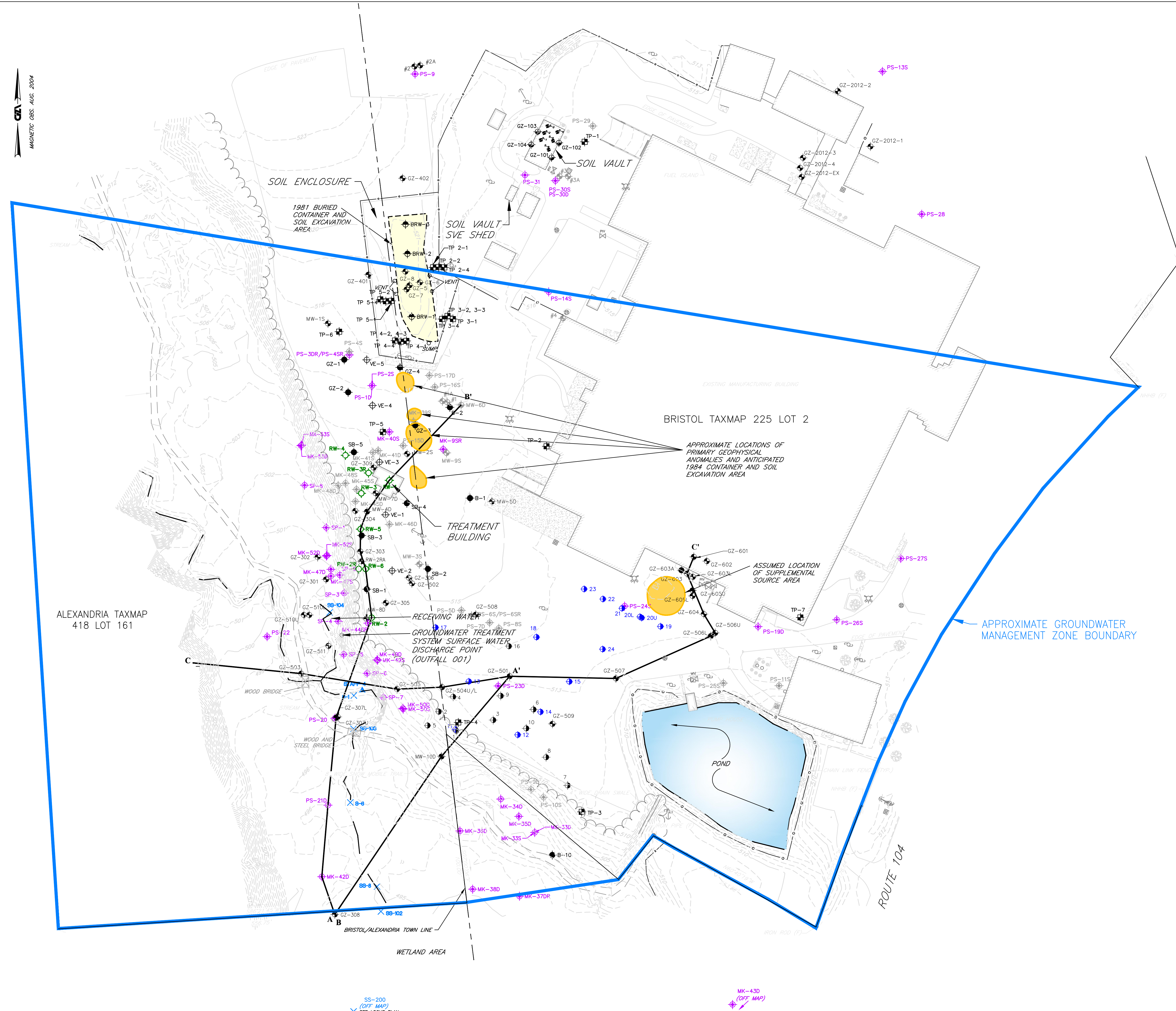
- 1.) BASED UPON A SITE PLAN PREPARED BY J.R. BLAIS ASSOCIATES OF MEREDITH, NEW HAMPSHIRE LAST REVISED ON 10/20/94, AND FIELD MEASUREMENTS.
- 2.) WELLS AND SAMPLE LOCATIONS ARE BASED ON FIELD MEASUREMENTS BY GZA GEOENVIRONMENTAL, INC.
- 3.) APPROXIMATE LIMIT OF DRUM DISPOSAL AREA IS BASED ON INFORMATION ON A PLAN BY PINE AND SWALLOW ASSOCIATES TITLED "LOCATION MAP, FREUDENBERG-NOK, BRISTOL, NH," STAMPED RECEIVED BY NHDES ON APRIL 13, 1993.
- 4.) GROUND SURFACE ELEVATION CONTOURS BASED ON PLAN BY PINE & SWALLOW ASSOCIATES TITLED "LOCATION MAP, FREUDENBERG-NOK, BRISTOL, NEW HAMPSHIRE," DATED NOVEMBER 1992 THAT WAS BASED ON A SITE SURVEY BY J.R. BLAIS ASSOCIATES OF MEREDITH, NEW HAMPSHIRE.

LEGEND:

- MK-47S ▲ SMALL DIAMETER MONITORING WELL
- MW-8D ▲ LARGE DIAMETER MONITORING WELL
- RW-2 ⊕ RECOVERY WELL
- S-1 × STREAM MONITORING LOCATION
- - - CHAIN LINK FENCE
- - - GROUNDWATER MANAGEMENT ZONE
- MW-5D ▲ LOWER UNIT GROUNDWATER ELEVATION CONTROL POINT
- PS-100 ▲ ABANDONED/DESTROYED MONITORING LOCATION
- HB-2 ⊕ SOIL BORING
- VE-4 ⊕ VAPOR EXTRACTION WELL
- GZ-306 ▲ PROPOSED PERFORMANCE MONITORING GROUNDWATER WELL
- SP-8 ⊕ APPROXIMATE SHALLOW GROUNDWATER SAMPLING LOCATION
- STREAM
- 514— GROUND SURFACE ELEVATION CONTOUR (SEE NOTE 4)

| | | | | | | | | | | | |
|---|--|---|--|--|--|--|--|---------------|--|-----------------|--|
| DESIGNED BY: J.M.W. | | CHECKED BY: J.M.W. | | APPROVED BY: S.R.L. | | DRAWN BY: R.L.C. | | SCALE: 1"=50' | | DATE: OCT. 2003 | |
| PROJECT No.: 22996 | | SHEET No.: 1 | | GZA GeoEnvironmental, Inc. Geography and Scientists 380 High Street MANCHESTER, NEW HAMPSHIRE 03103 (603) 623-3600 | | GZA GeoEnvironmental, Inc. 380 High Street MANCHESTER, NEW HAMPSHIRE 03103 (603) 623-3600 | | DESCRIPTION | | BY DATE | |
| GROUNDWATER EXTRACTION SYSTEM MODIFICATIONS FREUDENBERG-NOK GENERAL PARTNERSHIP SITE BRISTOL, NEW HAMPSHIRE | | SITE PLAN / REMEDIAL SYSTEM MODIFICATION LAYOUT | | | | | | | | | |

MAGNETIC OBS. AUG. 2004



LOCUS PLAN
(SCALE 1:24,000)

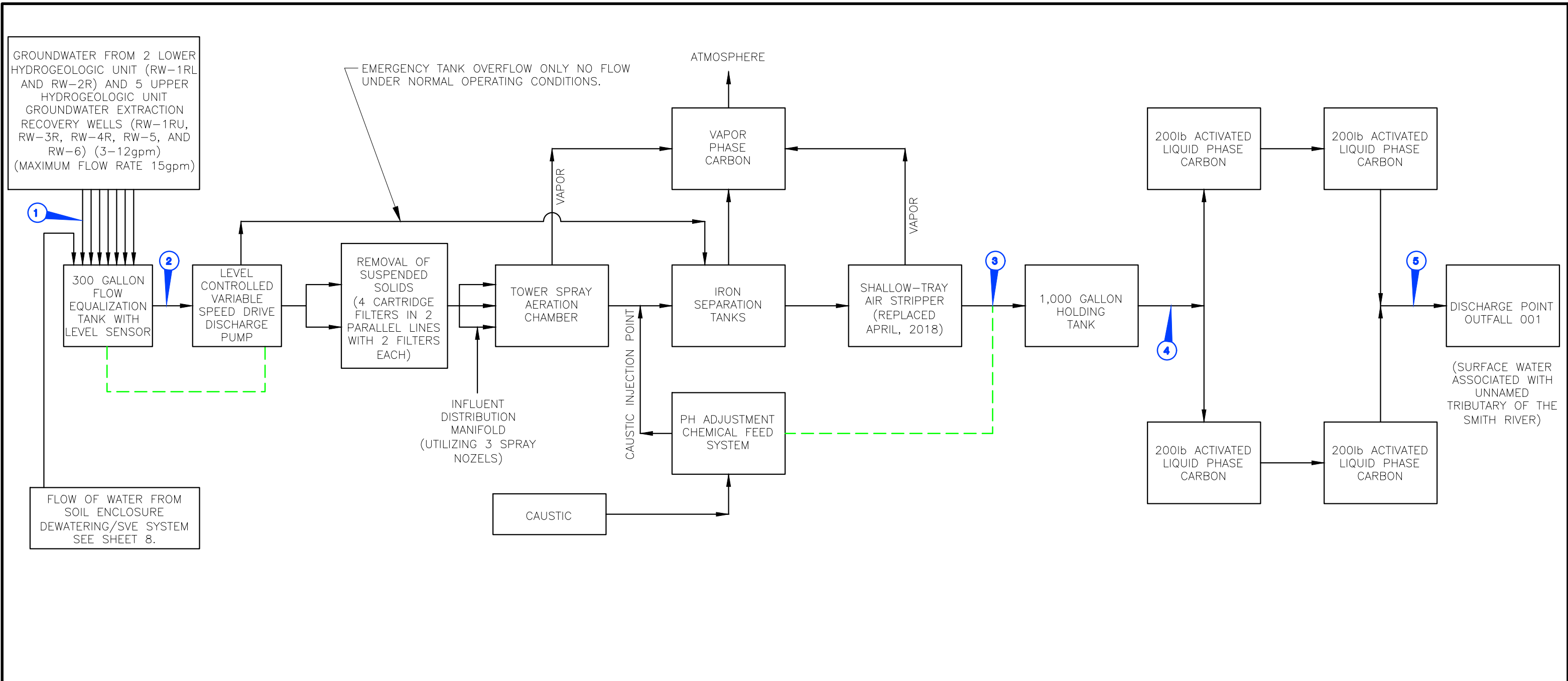
- NOTES:
- PLAN BASED ON A SITE SURVEY CONDUCTED BY TFMORAN OF BEDFORD, NEW HAMPSHIRE DURING AUGUST AND SEPTEMBER 2004. THE VERTICAL DATUM IS NOV. 1929. THE REFERENCE BENCHMARK IS NEW HAMPSHIRE DEPARTMENT OF TRANSPORTATION DISK STAMPED 059-0160 (ELEVATION 459.828 FEET). GROUND SURFACE CONTOUR INTERVAL IS 1 FOOT. PROPERTY LINES ARE BASED ON THE PLAN BY J.R. BLAIS ASSOCIATES IN NOTE 3 AND ARE NOT THE RESULT OF A BOUNDARY SURVEY BY TFMORAN.
 - LIMITS OF 1981 BURIED CONTAINER EXCAVATION AREA AND LOCATIONS OF ASSOCIATED TEST PITS ARE BASED ON PLAN BY WESTON ENVIRONMENTAL CONSULTANTS-DESIGNERS TITLED "SITE PLAN, INTERNATIONAL PACKINGS CORP., BRISTOL, NEW HAMPSHIRE," DATED DECEMBER 2, 1981. THE APPROXIMATE LOCATIONS OF PRIMARY GEOPHYSICAL ANOMALIES AND ANTICIPATED 1984 EXCAVATION AREA ARE BASED ON A PLAN BY WESTON GEOPHYSICAL CORPORATION TITLED "DRAFT - AREAS OF ANOMALOUS DATA, GPR SURVEY, GEOPHYSICAL SURVEY, INTERNATIONAL PACKINGS CORPORATION, BRISTOL, NEW HAMPSHIRE FOR WEHRAN ENGINEERING," DATED JUNE 1984.
 - THE LOCATIONS OF SOIL BORINGS AND TEST PITS, AND CERTAIN MONITORING WELLS, MICROWELLS, AND SURFACE WATER SAMPLING LOCATIONS THAT COULD NOT BE LOCATED WERE TAKEN FROM PLANS INCLUDING:
 - SITE PLAN BY J.R. BLAIS ASSOCIATES OF MERIDITH, NEW HAMPSHIRE LAST REVISED 10/20/94; AND
 - SITE PLANS BY MYKROWATERS ENVIRONMENTAL SERVICES OF CONCORD, MASSACHUSETTS, DATED 2/15/00 AND 1/22/01.
 - WELLS SHOWN AS DESTROYED OR DECOMMISSIONED ARE WELLS THAT WERE NOT LOCATED BY TFMORAN DURING THEIR 2004 SURVEY OR GZA DURING OUR WORK AT THE SITE.
 - SECTIONS OF CHAIN LINK FENCE ALONG THE NORTH, WEST, SOUTH, AND SOUTHEAST SIDES OF THE SOIL ENCLOSURE ADDED BY GZA BASED ON FIELD OBSERVATIONS.

- LEGEND:
- CHAIN LINK FENCE
 - GROUNDWATER MANAGEMENT ZONE
 - STREAM
 - GROUND SURFACE ELEVATION CONTOUR (SEE NOTE 1)
 - SOIL SAMPLING/BORING LOCATION
 - UPPER UNIT TEMPORARY WELL
 - LOWER UNIT TEMPORARY WELL
 - HORIZONTAL/ANGLE BORING INSTALLED IN SOIL VAULT
 - GROUNDWATER EXTRACTION WELL
 - SOIL BORING WITHOUT MONITORING WELL
 - SOIL VAPOR EXTRACTION WELL
 - MICROWELL
 - SOIL BORING WITH MONITORING WELL (GRAY COLOR INDICATES DESTROYED OR DECOMMISSIONED)
 - SOIL ENCLOSURE GROUNDWATER EXTRACTION WELL / SOIL VAPOR EXTRACTION WELL
 - TEST PIT
 - SURFACE WATER SAMPLING LOCATION
 - STAFF GAUGE
 - CROSS SECTION CUT LINE AND DESIGNATION (SEE SHEET NO. 2 FOR CROSS SECTIONS)
- SCALE IN FEET
0 30 60 120 180

YEAR 2017 ANNUAL REPORT
FREUDENBERG-NOK SEALING TECHNOLOGIES SITE
NHDES SITE NO. 198706012
BRISTOL, NEW HAMPSHIRE

SITE PLAN / LOCUS PLAN

| | | | |
|--|--|-----------------|-------------------|
| PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists 5 COMMERCE PARK NORTH, SUITE 201 BEDFORD, NEW HAMPSHIRE 03110 (603) 623-3600 | PREPARED FOR: Freudenberg Sealing Technologies | | |
| PROJ MGR: TPJ | REVIEWED BY: SRL | CHECKED BY: JMW | FIGURE |
| DESIGNED BY: CBM | DRAWN BY: MR | SCALE: 1" = 60' | 1 |
| DATE: JANUARY, 2018 | PROJECT NO. 04.0022996.49 | REVISION NO. | SHEET NO. 1 OF 10 |



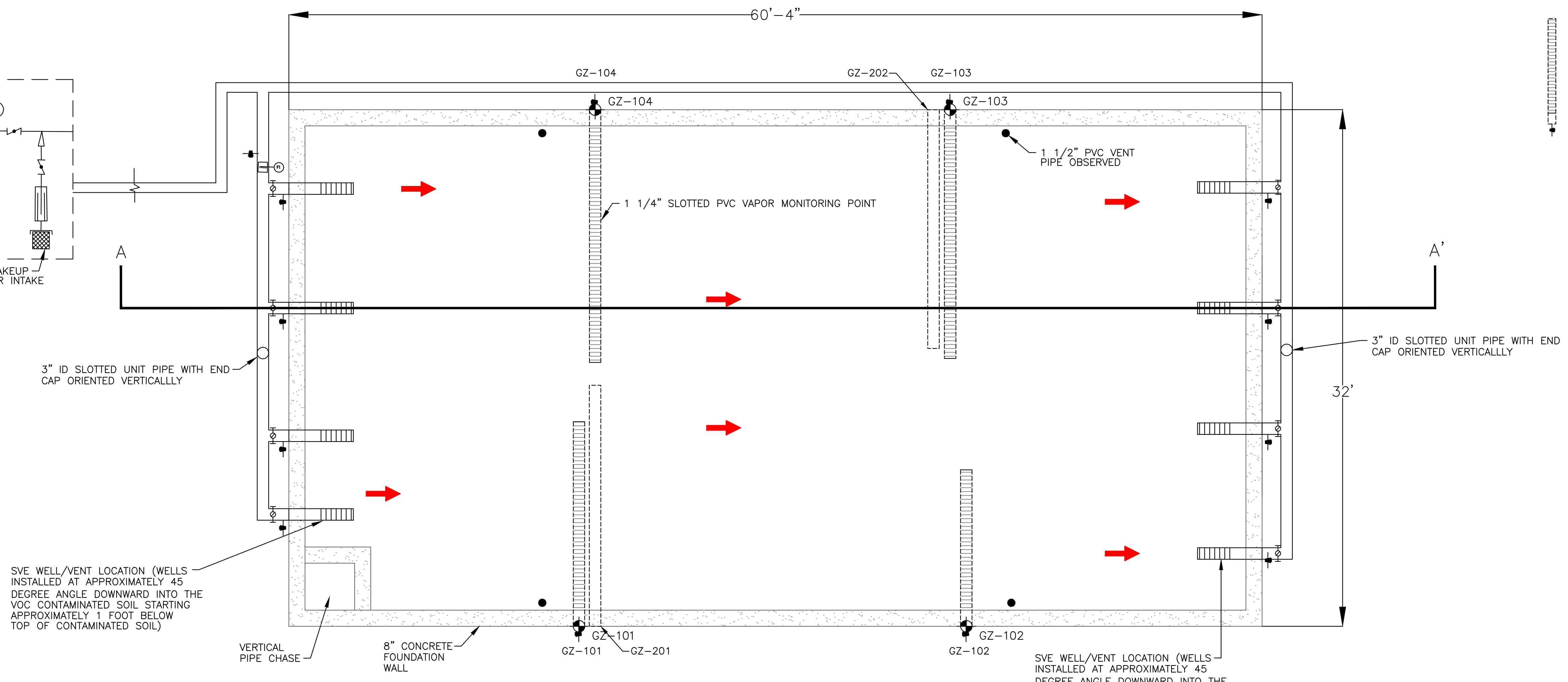
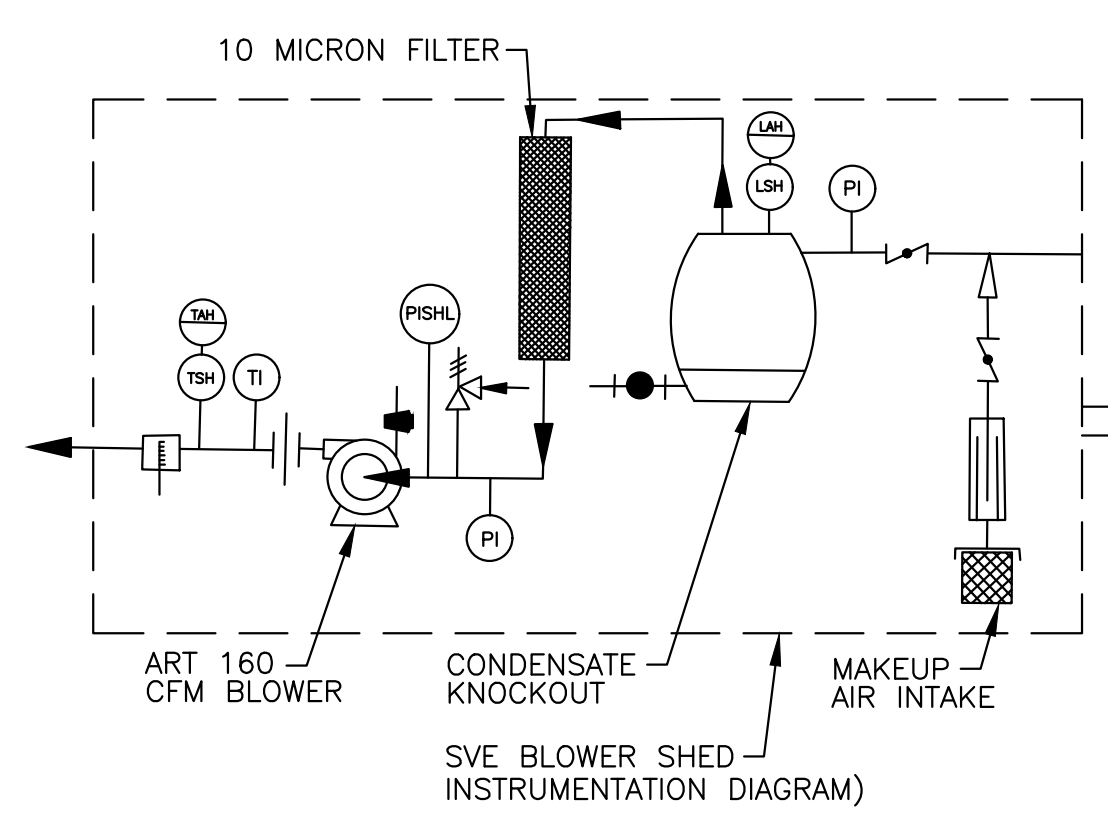
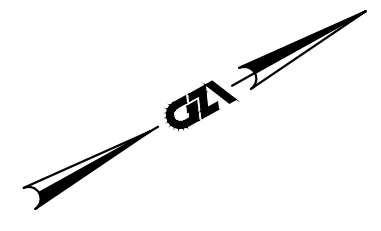
© 2018 - GZA GeoEnvironmental, Inc. GZA-PJ-22000A-22996-04.0022996-48\Figures-CAO\Freudenberg-Nok\Figure 2 - Existing GW Treatment System Schematic.DWG [Figure 10] May 30, 2018 - 4:36pm macchirene

- | SAMPLING LOCATION ID | DESCRIPTION |
|----------------------|--|
| 1 | FLOW METERING LOCATION (INFLUENT FROM EACH GROUNDWATER EXTRACTION WELL INDIVIDUALLY METERED) |
| 2 | INFLUENT SAMPLING LOCATION |
| 3 | PH MONITORING LOCATION |
| 4 | DISCHARGE FLOW METERING LOCATION |
| 5 | EFFLUENT SAMPLING LOCATION |

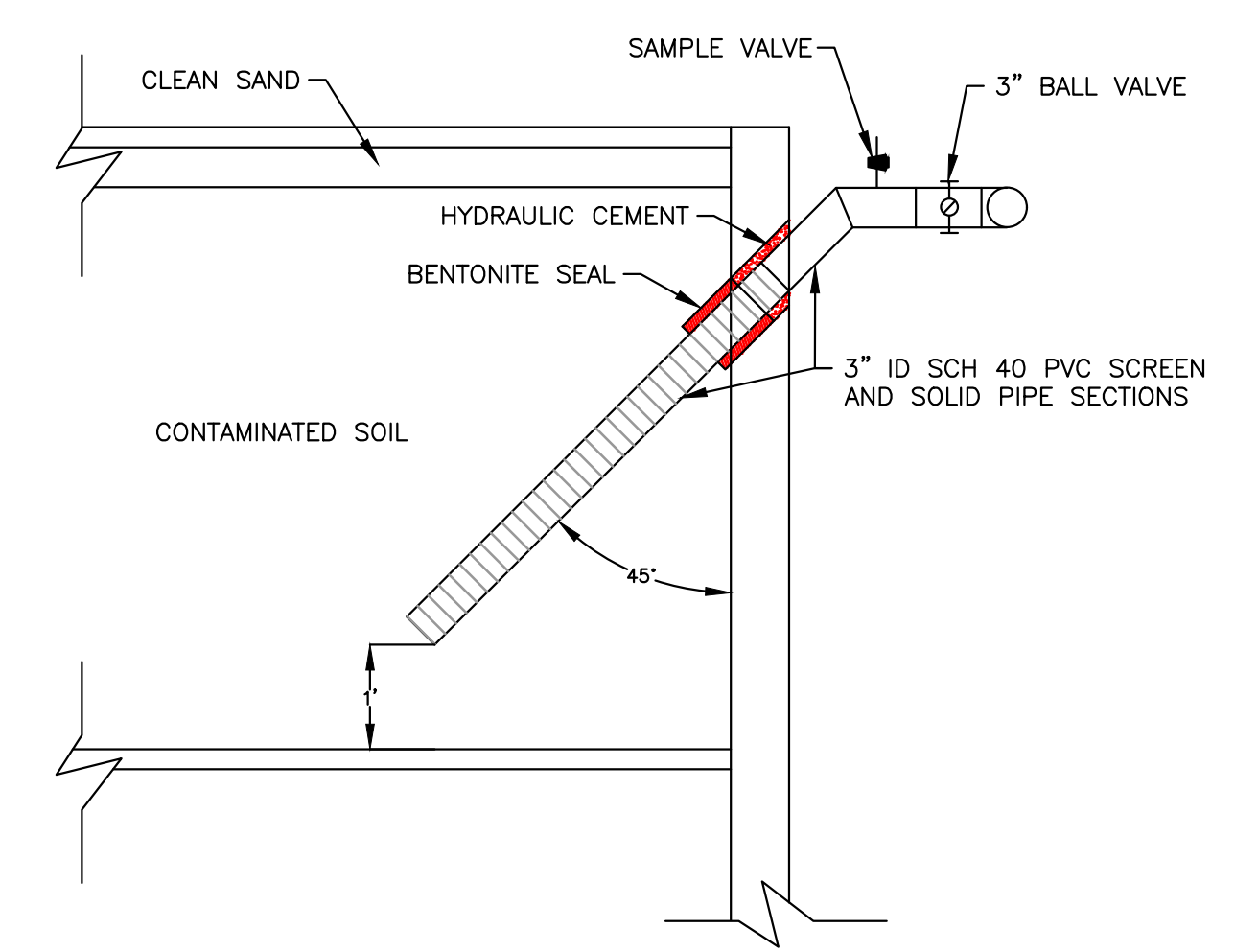
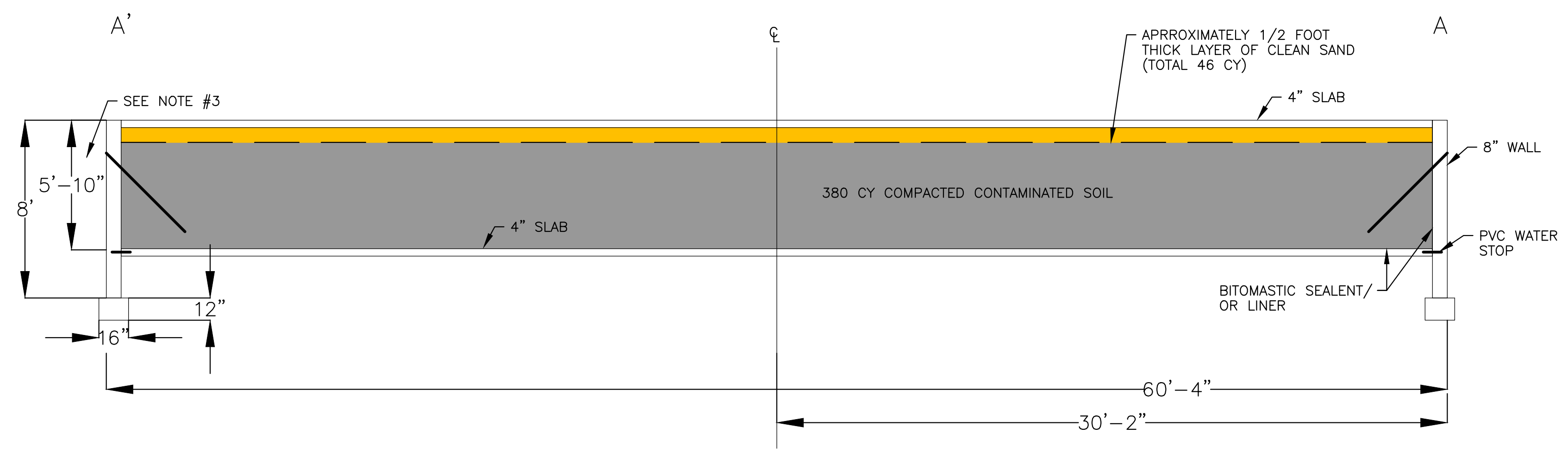
LEGEND
 - - - - - ELECTRICAL SIGNAL

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

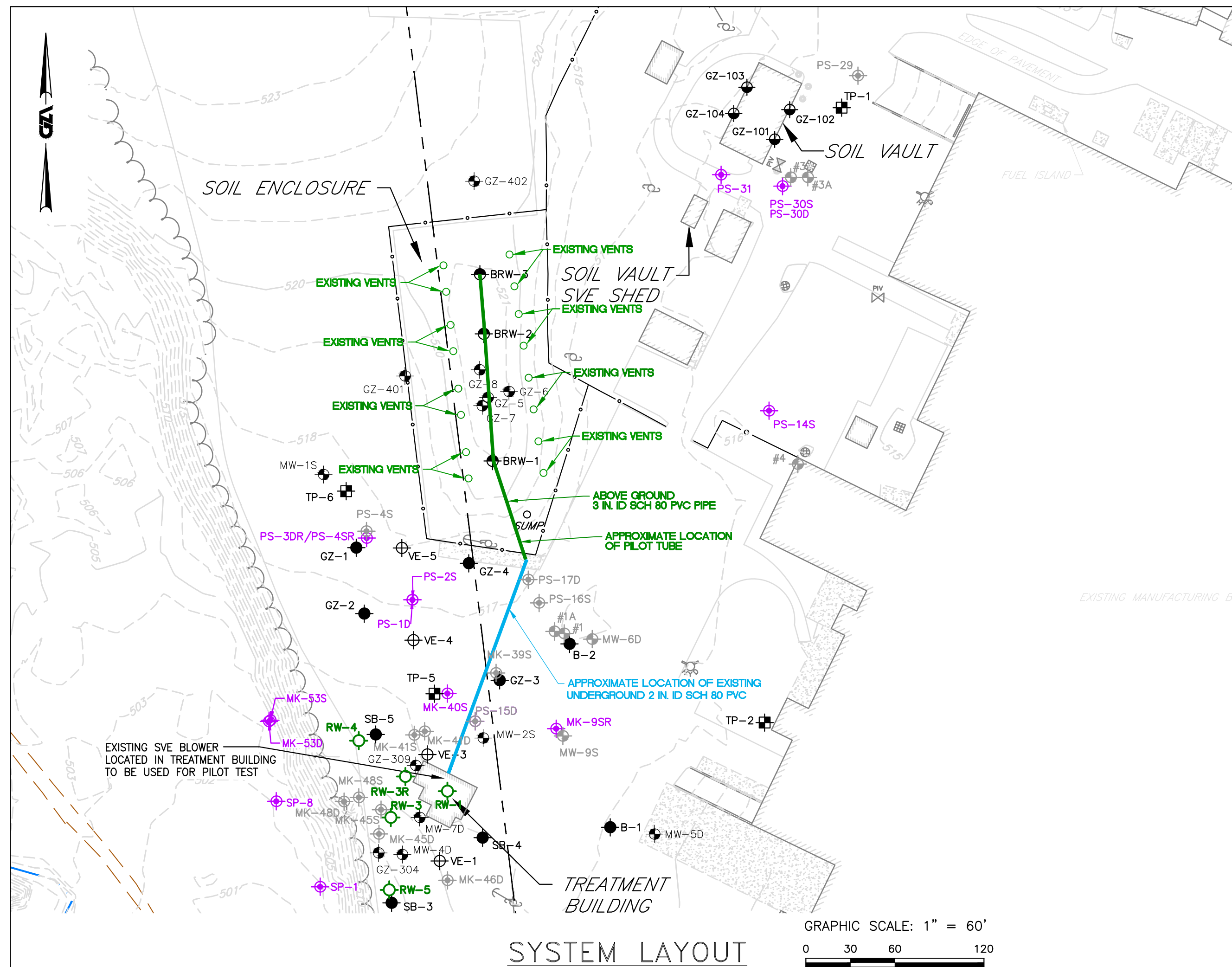
| | | | |
|---|---|--|------------------------------|
| YEAR 2017 ANNUAL REPORT FREUDENBERG-NOK SEALING TECHNOLOGIES SITE, NHDES SITE NO. 198706012 BRISTOL, NEW HAMPSHIRE | | | |
| EXISTING GROUNDWATER TREATMENT SYSTEM SCHEMATIC AS OF APRIL, 2018 | | | |
| PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists <small>5 COMMERCE PARK NORTH, SUITE 201 BEDFORD, NEW HAMPSHIRE 03110 (603) 823-3600</small> | PREPARED FOR: | | |
| PROJ MGR: TPJ DESIGNED BY: JMW DATE: JUNE, 2018 | REVIEWED BY: SRL DRAWN BY: MR PROJECT NO. 04.0022996.48 | CHECKED BY: JMW SCALE: NOT TO SCALE REVISION NO. | FIGURE 2 SHEET NO. |



- NOTES:
1. BASE PLAN BASED ON FIGURE BY F STARK TITLED, "FOUNDATION FOR SOLVENT SHED", DATED MARCH 22, 1985.
 2. REFER TO FIGURE 1 FOR "SOIL VAULT" LOCATION.
 3. DIMENSION SHOWN MAY BE INCORRECT BASED ON BORINGS DRILLED WITHIN SOIL VAULT DURING DECEMBER 2013 INDICATING A TOTAL DEPTH TO TOP OF LOWER CONCRETE SLAB FROM TOP OF UPPER CONCRETE SLAB OF APPROXIMATELY 8- FEET.
- LEGEND:
- ANGLE BORING DESIGNATION AND LOCATION RELATIVE TO HORIZONTAL. HORIZONTAL LINES INDICATE SOIL GAS WELL SCREEN
 - APPROXIMATE LOCATION OF PVC VENT PIPE OBSERVED BY GZA.
 - PROPOSED DIRECTION OF SOIL GAS FLOW
 - LEVEL SWITCH (LS)
 - PRESSURE INDICATOR (PI)
 - PRESSURE SWITCH (PS)
 - TEMPERATURE INDICATOR (TI)
 - FLOW INDICATOR (FI)
 - PITOT TUBE-AVERAGING TYPE
 - BALL VALVE-NORMALLY OPEN
 - BALL VALVE-NORMALLY CLOSED
 - BUTTERFLY VALVE-NORMALLY OPEN
 - PRESSURE OR VACUUM RELIEF VALVE
 - SAMPLE VALVE-NORMALLY CLOSED
 - BLOWER
 - AIR INTAKE FILTER
 - AIR/WATER SEPARATOR
 - IN-LINE PARTICULATE FILTER
 - SILENCER

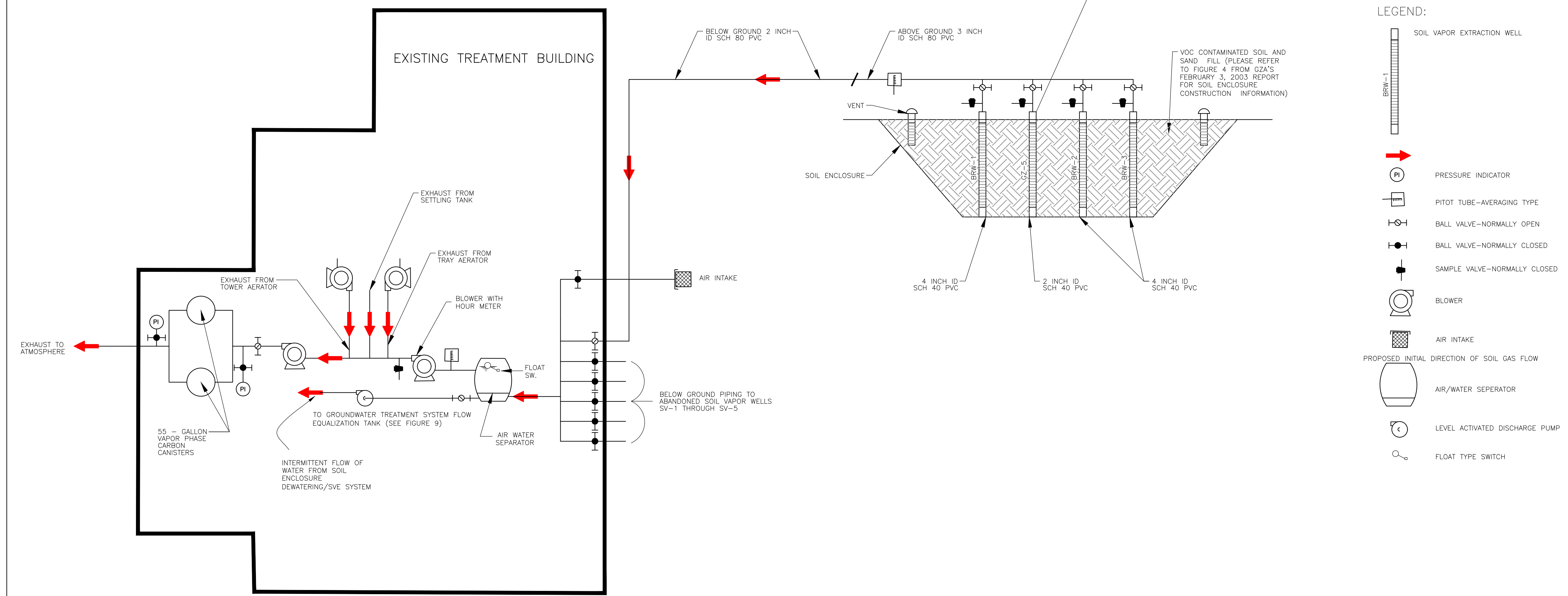
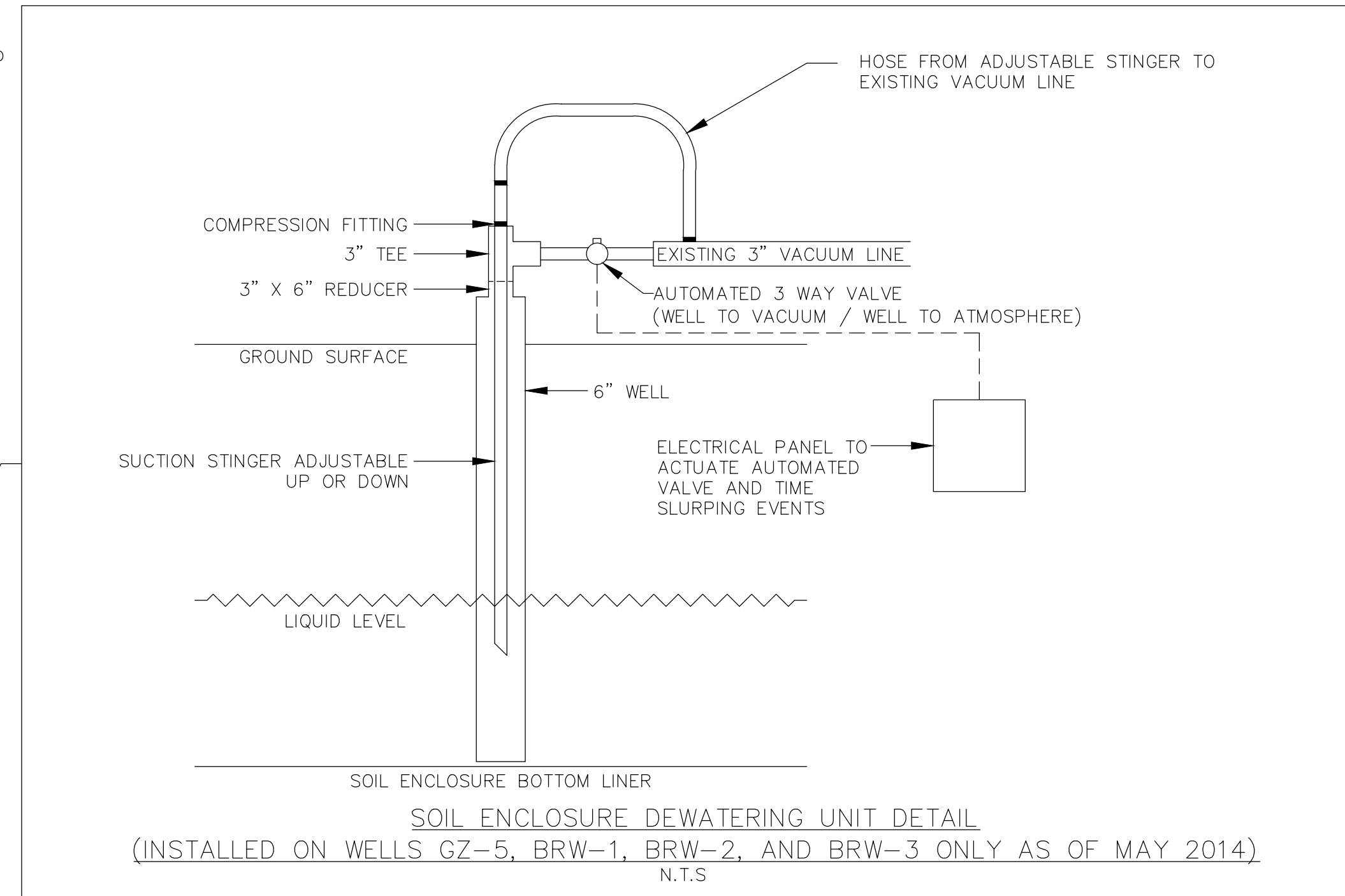


| | | | |
|---|---|--|---|
| YEAR 2017 ANNUAL REPORT FREUDENBERG-NOK SEALING TECHNOLOGIES SITE NHDES SITE NO. 198706012 BRISTOL, NEW HAMPSHIRE | | | |
| SOIL VAULT SVE SYSTEM DETAIL PLAN | | | |
| PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists <small>5 COMMERCE PARK NORTH, SUITE 201 BEDFORD, NEW HAMPSHIRE 03110 (603) 623-3600</small> | PREPARED FOR: | | |
| PROJ MGR: TPJ DESIGNED BY: CBM DATE: JANUARY, 2018 | REVIEWED BY: SRL DRAWN BY: MR PROJECT NO. 04.0022996.49 | CHECKED BY: JMW SCALE: AS SHOWN REVISION NO. | FIGURE 8 SHEET NO. 7 OF 10 |



- LEGEND:**
- CHAIN LINK FENCE
 - ▭ GROUNDWATER MANAGEMENT ZONE
 - ~ STREAM
 - 514 GROUND SURFACE ELEVATION CONTOUR (SEE NOTE 1)
 - ⊕-101 HORIZONTAL/ANGLE BORING INSTALLED IN SOIL VAULT
 - ⊕-RW-1 GROUNDWATER EXTRACTION WELL
 - ⊕-GZ-1 SOIL BORING WITHOUT MONITORING WELL
 - ⊕-VE-3 SOIL VAPOR EXTRACTION WELL
 - ⊕-PS-4S MICROWELL
 - ⊕-GZ-306 SOIL BORING WITH MONITORING WELL
 - ⊕-BRW-1 SOIL ENCLOSURE GROUNDWATER EXTRACTION WELL / SOIL VAPOR EXTRACTION WELL
 - ⊕-TP-7 TEST PIT
 - ⊕-SS-104 SURFACE WATER SAMPLING LOCATION
 - ⊕-STAFF-4 STAFF GAUGE
- GRAY COLOR INDICATES DESTROYED OR DECOMMISSIONED

- NOTES:**
- 1.) PLAN BASED ON A SITE SURVEY CONDUCTED BY TFMORAN OF BEDFORD, NEW HAMPSHIRE DURING AUGUST AND SEPTEMBER 2004. THE VERTICAL DATUM IS NGVD 1929. THE REFERENCE BENCHMARK IS NEW HAMPSHIRE DEPARTMENT OF TRANSPORTATION DISK STAMPED 059-0160 (ELEVATION 459.828 FEET). GROUND SURFACE CONTOUR INTERVAL IS 1 FOOT. PROPERTY LINES ARE BASED ON THE PLAN BY J.R. BLAIS ASSOCIATES IN NOTE 3 AND ARE NOT THE RESULT OF A BOUNDARY SURVEY BY TFMORAN.
 - 2.) SEE FIGURE 1 FOR ADDITIONAL NOTES AND LEGEND.



- LEGEND:**
- ⊕-VE-1 SOIL VAPOR EXTRACTION WELL
 - ⊕-BRW-1
 - ⊕-PI PRESSURE INDICATOR
 - ⊕-PITOT TUBE-AVERAGING TYPE
 - ⊕-BALL VALVE-NORMALLY OPEN
 - ⊕-BALL VALVE-NORMALLY CLOSED
 - ⊕-SAMPLE VALVE-NORMALLY CLOSED
 - ⊕-BLOWER
 - ⊕-AIR INTAKE
 - ⊕-PROPOSED INITIAL DIRECTION OF SOIL GAS FLOW
 - ⊕-AIR/WATER SEPARATOR
 - ⊕-LEVEL ACTIVATED DISCHARGE PUMP
 - ⊕-FLOAT TYPE SWITCH

PROCESS AND INSTRUMENTATION DIAGRAM
NOT TO SCALE

| | | | |
|---|---|--|---|
| YEAR 2017 ANNUAL REPORT FREUDENBERG-NOK SEALING TECHNOLOGIES SITE NHDES SITE NO. 198706012 BRISTOL, NEW HAMPSHIRE | | | |
| SOIL ENCLOSURE SVE SYSTEM DETAIL PLAN | | | |
| PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists 5 COMMERCE PARK NORTH, SUITE 201 BEDFORD, NEW HAMPSHIRE 03110 (603) 623-3600 | PREPARED FOR: | | |
| PROJ MGR: TPJ DESIGNED BY: CBM DATE: JANUARY, 2018 | REVIEWED BY: SRL DRAWN BY: MR PROJECT NO. 04.0022996.49 | CHECKED BY: JMW SCALE: AS SHOWN REVISION NO. | FIGURE 9 SHEET NO. 9 OF 10 |