



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



**Robert R. Scott, Commissioner**

EMAIL ONLY

April 5, 2023

Christopher S. Angier  
Senior Environmental Project Manager  
Saint-Gobain Performance Plastics  
14 McCaffrey Street  
Hoosick Falls, NY 12090

Subject: Merrimack – Saint-Gobain Performance Plastics, 701 Daniel Webster Highway  
DES Site #199712055, Project #36430

*2022 Stormwater and Surface Water Monitoring Report*, prepared by WSP USA Inc., dated  
February 17, 2023

Dear Christopher Angier:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the above-referenced submittal prepared on behalf of Saint-Gobain Performance Plastics (SGPP) by WSP USA Inc. for SGPP's facility located at 701 Daniel Webster Highway in Merrimack (site). This report was submitted as part of the ongoing investigation into the release of per- and polyfluoroalkyl substances (PFAS) from the Facility.

NHDES concurs with the report conclusion that a significant source of higher PFAS detections in stormwater is the run-off from the north end of the Main Building and the New Manufacturing Building. In addition, the data presented in the above-referenced report indicate that PFAS concentrations in samples collected from the building roof drains and the outfall have been reduced following installation of the Post-Regenerative Thermal Oxidizer (RTO) and removal of the rooftop emissions points. However, it is important to note that even after implementation of these mitigation measures, elevated concentrations of perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), and other PFAS continue to be detected in roof drain samples and impacted stormwater continues to be discharged to the Merrimack River through the stormwater conveyance system at the Site.

NHDES looks forward to receipt and review of the Remedial Action Plan (RAP) for the Site that is due on May 5, 2023. As outlined in our letter dated April 28, 2022, the RAP must include the SGPP parcel as well as all abutting properties and address Ambient Groundwater Quality Standard (AGQS) violations, soil contamination, stormwater, and any ongoing releases. While there are no surface water standards currently in effect for PFAS, NHDES recommends inclusion of remedial actions to prevent contamination of surface water in the RAP.

Should you have any questions regarding this letter, please contact me at NHDES' Waste Management Division.

Sincerely,

Andrew Fuller, P.G.  
Hazardous Waste Remediation Bureau

Waste  
Management  
Division

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Management Division  
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