

TECHNICAL MEMORANDUM

To: Laura Buono, Town of Hillsborough
From: Scott R. Nerney, Sanborn Head
File: 4088.014
Date: August 5, 2026
Re: Former Woods Woolen Mill Site – Soil Stabilization
23-25 West Mill Street
Hillsborough, New Hampshire
NHDES Site Number 199909015

cc: Laura Pasquine, NHDES
Meena Mortazavi, USEPA

In October 2025, Sanborn, Head & Associates, Inc. (Sanborn Head) prepared an Analysis of Brownfields Cleanup Alternatives (ABCA) Update/Remedial Action Plan (RAP) on behalf of the New Hampshire Department of Environmental Services (NHDES) for the property located at the former Woods Woolen Mill (the site) at 23-25 West Mill Street in Hillsborough, New Hampshire. As presented in the RAP, the remedial scope for the site includes the excavation of lead-impacted soils for disposal off-site as non-hazardous waste pending waste characterization analysis.

The Contractor hired to perform the remediation indicated in June 2026 that in order to profile the soil proposed for off-site disposal, additional Toxicity Characteristic Leaching Procedure (TCLP) analysis for lead was needed since the total lead concentrations in soil samples collected and analyzed in July 2025 had exceeded the TCLP 20x screening limit of 100 milligrams per kilogram (mg/kg) for lead.

Following discussions with NHDES and U.S. Environmental Protection Agency (USEPA), additional soil samples were collected in July 2026 and analyzed for TCLP lead. The concentration of one of the soil samples was 8.3 milligrams per liter (mg/L), exceeding the Hazardous Waste Criteria in 40 CFR 261.24 for lead of 5 milligrams per liter (mg/L). Therefore, if generated as is, the soil would be classified as a hazardous waste for the purposes of off-site disposal.

In joint discussion, the NHDES and USEPA concluded that the most cost-effective solution to efficiently progress the remediation project was in-situ treatment of the soil with an amendment that would stabilize the lead from leaching and allow the site soil to be classified as non-hazardous waste when generated for disposal. Soil stabilization is proposed to be performed as described below.

- The soil will be mixed with a lead stabilizer reagent within the excavation area using an excavator.
- Following mixing, soil samples will be collected for TCLP analysis of lead to confirm that lead concentrations meet the criteria to classify the soil as non-hazardous waste.
- Upon confirmation of achieving non-hazardous classification, the remediation project will continue as outlined in the ABCA/RAP.

On-site lead stabilization activities will be performed by the remediation Contractor, who anticipates partnering with a qualified subcontractor with experience in soil stabilization remediation.

If you have any questions, please contact Laura Buono at the Town of Hillsborough at (603) 464-7970 or Laura@Hillsboroughnh.net.

SRN/JHS: srn

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