

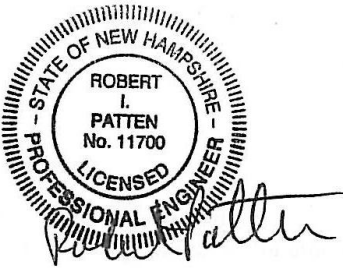
**DES Waste Management Division
29 Hazen Drive; PO Box 95
Concord, NH 03302-0095**

**ANALYSIS OF BROWNFIELDS CLEANUP
ALTERNATIVES**

Kleen Laundry Former Dry-Cleaning Facility
Office Building
1 Foundry Street
Lebanon, New Hampshire 03766
NHDES Site No. 198801003

Project Type: Cleanup
Project Number: 3338

Prepared For:
LWM Residential, LLC
212 W 11th Street, #4
New York, New York 10014
Phone: (302) 598-3492
Contact: Mr. Jon Livadas



Prepared By:
CREDERE ASSOCIATES, LLC
776 Main Street
Westbrook, ME 04902
Phone: (207) 232-5387
Contact: Allison Drouin, LG, PG
Certifying Engineer: Rip Patten, PE
adrouin@crederellc.com, rpatten@crederellc.com

January 28, 2026



CREDERE ASSOCIATES, LLC

776 Main Street
Westbrook, Maine 04092
Phone: 207-828-1272
Fax: 207-887-1051

January 28, 2026

Laura Pasquine
New Hampshire Department of Environmental Services
PO Box 95; 19 Hazen Drive
Concord, New Hampshire 03302-0095

Jonathan Livadas
LWM Residential, LLC
212 W 11th Street #4
New York, New York 10014
Via email: jon.livadas@outlook.com

**Subject: Analysis of Brownfields Cleanup Alternatives
Kleen Laundry Former Dry-Cleaning Facility – Office/Storage Building
1 Foundry Street, Lebanon, New Hampshire 03766
NHDES Site No. 198801003**

Dear Ms. Pasquine and Mr. Livadas:

This Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared to present an evaluation of remedial alternatives and selection of the remedial alternative that will be implemented to address known environmental contamination in the office/storage building at the above referenced property (Site). This ABCA has been prepared in compliance with EPA requirements for activities funded by a USEPA Brownfields Revolving Loan Fund (RLF) administered by the Monadnock Economic Development Commission (MEDC).

Please do not hesitate to contact me at (207) 828-1272 ext. 15 if you have any questions, comments, or require additional information regarding this report.

Sincerely,
CREDERE ASSOCIATES, LLC

Allison Drouin, PG, LG
Senior Project Manager/Geologist

Rip Patten, PE
Vice President

Enclosure: Analysis of Brownfields Cleanup Alternatives



CREDERE ASSOCIATES, LLC

776 Main Street
Westbrook, Maine 04092
Phone: 207-828-1272
Fax: 207-887-1051

Analysis of Brownfields Cleanup Alternatives

**Kleen Laundry Former Dry-Cleaning Facility
Office/Storage Building**

**1 Foundry Street
Lebanon, New Hampshire 03766
NHDES Site No. 198801003**

Prepared for:

**LWM Residential, LLC
212 W 11th Street #4
New York, New York 10014**

Prepared by:

Credere Associates, LLC

January 28, 2026

In Reference to: Project No. 21001623



TABLE OF CONTENTS

1. INTRODUCTION.....	1-1
1.1 Site Location	1-1
1.2 Regional & Site Vulnerabilities	1-1
1.3 Previous Site Use(s) and Previous Cleanup/Remediation	1-2
1.4 Site Assessment Findings	1-2
1.5 Project Goals	1-3
2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS.....	2-1
2.1 Cleanup Oversight Responsibility	2-1
2.2 Cleanup Standards	2-1
2.3 Laws & Regulations Applicable to the Cleanup.....	2-1
3. DESCRIPTION OF REMEDIAL ALTERNATIVES.....	3-1
4. COMPARATIVE ANALYSIS OF CLEANUP ALTERNATIVES	4-1
4.1 Evaluation of Remedial Alternatives	4-1
4.2 Justification for the Selected Remedial Alternative.....	4-5
4.3 Green and Sustainable Remediation Measures for Selected Alternative.....	4-5
5. SCHEDULE OF CLEANUP ACTIVITIES	5-1

LIST OF FIGURES

Figure 1	Site Location Map
Figure 2A	Site Plan Overview
Figure 2B	Detailed Site Plan
Figure 3	Hazardous Building Materials Location Plan – Office/Storage Building First Floor
Figure 4	Hazardous Building Materials Location Plan – Office/Storage Building Second Floor

1. INTRODUCTION

Creder Associates, LLC (Creder) was retained by LWM Residential, LLC (Owner) to prepare this Analysis of Brownfields Cleanup Alternatives (ABCA) for the Kleen Laundry Former Dry-Cleaning facility located at 1 Foundry Street in the City of Lebanon, Grafton County, New Hampshire (Site). A Site Location Map is provided as **Figure 1**. The purpose of this ABCA is to address documented environmental conditions identified through prior assessment activities, evaluate remedial alternatives, and justify the selected remedial action to prepare the Site for eventual redevelopment as residential housing.

Cleanup activities presented in this ABCA are planned to be funded in part by a Brownfields Revolving Loan Fund (RLF), which is given by the United States Environmental Protection Agency (USEPA) and administered by the Monadnock Economic Development Commission (MEDC). The grant funds will be used by LWM to conduct abatement of polychlorinated biphenyl (PCB)-containing building materials and/or other hazardous building materials (HBMs) within the onsite office/storage building, to facilitate building demolition and Site redevelopment. Therefore, this ABCA is differentiated from the September 15, 2025, approved ABCA/Remedial Action Plan (RAP) for the entire Site to increase clarity of publicly versus privately-funded activities at the Site.

1.1 SITE LOCATION

The Site comprises Map 91, Lot 263 (approximately 4.2 acres), made up of the former 25 Mechanic Street and 1 Foundry Street, and an undeveloped parcel on Water Street (identified as the River Island and Map 106, Lot 33; 1.1 acres). There are no current plans for the River Island and this area is not discussed further. Site parcels are shown on the Site Plan Overview provided as **Figure 2A**. The office/storage building, which is the focus of this ABCA, is located in the west central portion of the 1 Foundry Street property.

1.2 REGIONAL & SITE VULNERABILITIES

The Site is located adjacent to the Mascoma River. According to the Federal Emergency Management Agency (FEMA) Flood Zone Map 33009C0894E, the eastern edge of the Site is located within Zone AE, where base flood elevations have been determined during inundation by a 100-year flood; however, the majority of the Site is within Zone X, which are areas of minimal flood hazard and have been determined to be outside the 500-year flood plain. Greater storm frequency and intensity in changing weather may result in more frequent high-water levels and more frequent flooding of the eastern portion of the Site. Increased frequency of extreme weather events may also impact exterior portions of the Site and may result in increased erosion of improperly stabilized fill and/or building foundations.

Based on the nature of the proposed reuse of the Site, changing temperature, wildfires, changing dates of ground thaw/freezing, and changing ecological zone are not likely to affect the Site, particularly the remedial measures evaluated as part of this ABCA.



1.3 PREVIOUS SITE USE(S) AND PREVIOUS CLEANUP/REMEDiation

The Site is improved with three vacant buildings, including one 13,527-square foot (sf) office/storage building, which is the subject of this ABCA, one 59,565-sf mill building, and a detached approximately 2,000-sf boiler house. The remainder of the exterior portion of the Site is vegetated or grassy areas or paved parking.

Reviewed records do not indicate when former mill building was originally constructed, but by 1884, it was operated by Shoddy Mill. By 1949, the current office/storage building was constructed and the Site was operated by Lebanon Woolen Mills, along with the former American Woolen Mill across the Mascoma River. The Gosselin family (owners of Kleen Laundry and former owners of the Site) acquired the former Lebanon Woolen Mills buildings (the mill building, office/storage building, and boiler house) in 1965 and began operations as a commercial dry-cleaning business. Kleen Inc. operated the Site buildings until September 2019. The Site buildings have been vacant since.

Between 1987 and 2017 remedial actions were undertaken to address historical releases that occurred at the Site. Those remedial actions consisted of removal or closure in place of several underground storage tanks (USTs) once used for oil storage, and removal of contaminated soil associated with leaking USTs. Additionally, since that time, regular groundwater monitoring has been performed in compliance with a NHDES Groundwater Management Permit.

1.4 SITE ASSESSMENT FINDINGS

The Site is regulated by the New Hampshire Department of Environmental Services (Site IDs 198801003 and 201704036) due to historical oil and hazardous material releases to the soil and groundwater. Since the late 1980s, numerous investigations have been performed to assess impacts to soil, groundwater, and soil vapor, as well as to evaluate the presence of Hazardous Building Materials (HBM). Investigation results indicate the primary sources of contamination are related to operation of the Site as a woolen mill and as a commercial dry cleaner, and from leaking fuel USTs.

Based on historical investigations, contaminants of potential concern (COPCs) at the Site consist of chlorinated volatile organic compounds and petroleum related hydrocarbons in soil, groundwater, and soil vapor; and polychlorinated biphenyls (PCBs), asbestos, and lead in building materials. Soil, groundwater, and soil vapor contamination will need to be addressed as part of Site redevelopment, but activities to address those impacts will not be funded through the Brownfields loan so they are not detailed in this ABCA. PCB, asbestos, and lead impacted building materials identified within the office/storage building are the subject of this ABCA.

Under current conditions, potential exposure to Site COPCs includes only trespassers (passive users), as the Site is not regularly in use or occupied. However, future redevelopment may broaden potential exposure to other receptor groups including construction workers during redevelopment. Exposure pathways include incidental uptake of contaminated dust by all receptors, dermal absorption through contact with impacted media by all receptors, and active ingestion by future occupants or construction workers employing poor hygiene.



Other environmental conditions in addition to HBMs in the office/storage building for the larger Site (i.e., the mill building, boiler building, and former retail building) are detailed in the September 15, 2025, ABCA/RAP for the Site.

A comprehensive summary of Site-wide investigations is included in the September 15, 2025, ABCA/RAP for the Site.

1.5 PROJECT GOALS

The Site is planned to be redeveloped for multi-family housing. The office/storage building that is the subject of this ABCA is planned to be demolished to accommodate the overall redevelopment design of the Site.

Further details regarding redevelopment plans for the other remaining Site structures are included as part of the ABCA/RAP for the entire Site dated September 15, 2025.



2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 CLEANUP OVERSIGHT RESPONSIBILITY

The project will be overseen by the NHDES as the lead regulatory agency under project tracking number 198801003. Cleanup will be overseen by the Owner's NH Professional Engineer (PE) and compliance with requirements for EPA Brownfields federal funding through MEDC will be overseen by MEDC's Qualified Environmental Professional (QEP).

2.2 CLEANUP STANDARDS

The following regulatory standards or guidelines will be applicable to cleanup of the office/storage building:

Asbestos in Building Materials

Post abatement conditions at the Site should be safe for re-occupancy as defined in NHDES Env-A 1800: Asbestos Management and Control (Env-A 1800).

PCBs in Building Materials (primarily paint)

Removal decisions and actions will be governed by Toxic Substances Control Act (TSCA) Title 40 CFR § 761.62, which establishes a PCB Bulk Product Waste threshold criterion of greater than, or equal to 50 milligrams per kilogram (mg/kg). Materials with PCB concentrations greater than this threshold require removal from use and proper disposal as hazardous waste. Excluded PCB Bulk Product Wastes with concentrations between 1 mg/kg and 50 mg/kg are also required to be properly disposed of when removed from use. Any building materials containing PCBs at concentrations less than 1 mg/kg are unrestricted for future use and/or disposal per 40 CFR § 761.61(a)(4)(i)(A).

Lead in Paint

The remediation goal for lead in paint is to properly manage exposure to allow safety of construction workers in accordance with the Occupational Safety and Health Administration (OSHA) Lead in Construction guidelines for work in the 1 Foundry Street Site buildings. Compliance with NH Solid Waste rules will occur incidentally through compliance with the more stringent PCB Cleanup Standards discussed above.

Removal decisions and actions must be performed by a licensed abatement contractor under the New Hampshire Code of Administrative Rules, Lead Poisoning, Prevention, and Control Rules, Chapter He-P 1600. Abatement activities are defined in Chapter He-P 1609.02.

2.3 LAWS & REGULATIONS APPLICABLE TO THE CLEANUP

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, and town by-laws. Though this is not a comprehensive list.



3. DESCRIPTION OF REMEDIAL ALTERNATIVES

The remedial actions selected for the office/storage building should eliminate the potential for human exposure and/or improper disposal of COCs at the Site. Multiple remedial alternatives are available to address the identified COCs in the office/storage building.

Alternative #1 – No Action

Under a “No Action” alternative, no remediation activities would be implemented at the Site. This alternative is presented and discussed as a baseline comparison and represents the existing conditions at the Site. The “No Action” alternative does not include a means for mitigating or eliminating potential exposure to hazardous building materials during, and following, redevelopment and does not allow for compliance with the TSCA federal regulations for PCB Bulk Product Waste. As the building is planned for demolition as part of the redevelopment regardless of remediation, no action would also not allow for compliance with Env-A 1800 Asbestos Management and Control Regulations, which requires pre-demolition abatement. Therefore, the potential for human exposure continues to exist for future patrons, residents, excavation/construction works, and commercial workers.

Alternative #2 – Pre-demolition asbestos abatement and PCB Bulk Product Waste whole component removal by demolition

Under this alternative, ACM would be abated and TSCA regulated PCB-containing building materials in the office/storage building would be removed and properly disposed of as whole components via demolition. PCB Bulk Product Waste paint is prevalent and on most components of the office/storage building structure. Materials that the paint is adhered to would also be considered PCB Bulk Product Waste and disposed of as such at a properly licensed landfill. Management of lead paint via whole component removal would therefore be incidental.

Alternative #3 – Asbestos abatement and selective PCB Bulk Product and PCB Remediation Waste removal

Under this alternative, ACM would be abated and PCB-containing building materials would be removed from the building and confirmed through confirmatory sampling.

To implement this alternative according to 40 CFR 761, PCBs in building materials would require further delineation both spatially throughout the building and for migration into substrates. Depending on the results of this delineation, PCB paint could be removed as a Bulk Product Waste followed by confirmatory sampling at a frequency required by 40 CFR 761 to ensure substrate concentrations are less than 1 mg/kg, OR paint and associated substrate (a PCB remediation waste) could be removed followed by confirmatory sampling to ensure adequate PCB removal to a concentration less than 1 mg/kg. Construction materials on the second floor such as drywall and wood trim would still be demolished and disposed of as PCB Bulk Product Waste since they cannot be practically remediated in place. Once concentrations of PCBs have been confirmed to be less than 1 mg/kg through confirmatory sampling, the building would be considered appropriately remediated. Management of lead paint would be incidental to the PCB paint removal.



4. COMPARATIVE ANALYSIS OF CLEANUP ALTERNATIVES

The comparison and evaluation of remedial alternatives has been conducted using the six criteria listed below:

1. Effectiveness and reliability
2. Feasibility and ease of implementation
3. Risk reduction and associated benefits
4. Cost effectiveness using the net present worth of all future costs
5. Green Remediation Potential
6. Estimated time to reach “No Further Action”

4.1 EVALUATION OF REMEDIAL ALTERNATIVES

Alternative #1 – No Action

Effectiveness and Reliability

This alternative is not effective or reliable because COCs in building materials would remain in place, thus not eliminating the potential for exposure and also inhibiting the ability to redevelop this portion of the Site.

Feasibility and Ease of Implementation

This alternative is feasible and the easiest to implement, as no actions would occur.

Risk Reduction and Associated Benefits

Because no action would occur, there would be no risk reduction or associated benefits.

Cost Effectiveness Using the Net Present Worth of All Future Costs

The total cost of this alternative is \$0. This alternative is not considered cost effective because it does not accomplish project goals.

Green Remediation Potential

Because no actions would take place under this alternative, emission during transportation, and management of disposal material is not a concern. As the building would continue to deteriorate, there would be future concerns that COCs currently in building materials may be released to the environment.

Estimated Time to Reach “No Further Action”

Under this alternative, no further action could not be achieved because the potential for exposure to COCs would remain.



Alternative #2 – Pre-demolition asbestos abatement and PCB Bulk Product Waste whole component removal by demolition

Effectiveness and Reliability

Due to the prevalence of paint in the office/storage building containing PCBs exceeding TSCA Bulk Product Waste thresholds, complete removal of the building would effectively eliminate the potential for PCB-impacted materials to remain at the Site into redevelopment. Complete removal of the building would also require prior ACM abatement. Once the office/storage building is removed from the Site, the remedial action objective will have been attained and determination of success is easy to demonstrate. The mobility and volume of contaminants will be eliminated. This alternative is effective for the Site because the risk of exposure by potential receptors is eliminated. This alternative is considered similarly effective and reliable to Alternative #3.

Feasibility and Ease of Implementation

This alternative uses standard abatement and demolition techniques and transportation/disposal methods for disposal of the building components at a licensed landfill. As whole component removal would eliminate the need for further delineation of PCB impacts in the office/storage building as well as the need for confirmatory sampling at the frequency required by 40 CFR 761, this alternative is more easily implemented. Removal via demolition is a common method for reducing exposure to hazardous building materials, especially in buildings that may already be structurally unsound or that are not aligned with the desired redevelopment approach. Therefore, this alternative is more feasible and more easily implementable than Alternative #3.

Risk Reduction and Associated Benefits

Elimination of contaminant source via removal is a proven method of eliminating risk of exposure. As this alternative can be implemented on a shorter timeframe and with less frequency/intensity of exposure, this alternative benefits the construction/remediation team. Abatement prior to demolition allows for a controlled abatement and compliance with the NH Env-A 1800 and minimize exposure to the public during demolition. As exposure is eliminated with complete component removal of both PCBs and ACM, this alternative is considered to reduce risk similarly to Alternative #3.

Cost Effectiveness Using the Net Present Worth of All Future Costs

Based on prior project and contractor experience, the estimated cost of this alternative is broken down below:

Programmatic Planning/Reporting	\$13,175
Engineering/Oversight/Reporting	\$15,000
Asbestos Abatement	\$64,945
Waste Characterization Sampling ¹	\$5,720
Building Demolition & Transportation	\$245,518
Disposal as TSCA Bulk Product Waste ²	\$420,000
Total	\$764,358

¹assumes 4 bulk samples analyzed for TCLP PCBs and RCRA 8 Metals

²assumes 1200 cy (2400 tons) at \$175 per ton for disposal



Green Remediation Potential

This alternative requires a significant amount of offsite disposal of impacted building materials and demolition debris as TSCA-regulated PCB Bulk Product Waste at a licensed landfill, resulting in fuel consumption and greenhouse gas emissions during transport. This alternative does not require the additional materials and fuel consumption involved in delineation/confirmatory sampling and PCB Remediation Waste transportation to a hazardous waste disposal facility, of which there are none in the northeast. This would allow for disposal of PCB Bulk Products Wastes at a local/regional landfill and would reduce transportation impacts by using local contractors. For these reasons, this alternative is considered to have more green remediation potential than Alternative #3.

Estimated Time to Reach “No Further Action”

Under this alternative, one round of waste characterization sampling would be required to determine the appropriate disposal location for the building waste (under the assumption the waste stream is not characteristic hazardous waste). Immediately following demolition and removal of PCB-impacted office/storage building material waste, this portion of the Site would meet the requirements for “No Further Action”. This is a single-phase process and requires no additional delineation, remediation or confirmatory sampling prior to demolition, which expedites the completion process to ready the area for redevelopment. Based on these considerations, this alternative would take less time than Alternative #3.

Alternative #3 – Asbestos abatement and selective PCB Bulk Product and PCB Remediation Waste removal

Effectiveness and Reliability

Under this alternative, ACM would be abated and known PCB-containing materials would be entirely removed from the office/storage building. Confirmatory grid sampling would confirm the effectiveness of the removal of PCB-containing materials. Further testing of substrates below these materials, which is mostly brick/mortar, wood, and concrete, would be required to determine whether leaching has occurred. If migration of PCB-containing paint has impacted these porous substrates, delineation of the extent of impacts in all areas of the building would be necessary to effectively reduce concentrations to below the regulatory cleanup goal. Based on the ubiquity of PCB-containing paints throughout the building, extensive delineation may be required. As the process for the delineation and remediation is prescribed by 40 CFR 761, the process has been proven effective and reliable, making this alternative equally reliable to Alternative #2.

Feasibility and Ease of Implementation

This alternative would require extensive additional delineation, confirmation sampling of substrates following removal of the known PCB-impacted materials in the office/storage building, as well as potential removal of PCB remediation waste substrates prior to successful remediation. If substrates are impacted (the walls are mostly brick and bottom floor is concrete), targeted removal of portions of the building via means such as brick masonry, repointing, and concrete cutting/grinding may be necessary. Based on the extensive building components containing PCB Bulk Product Waste paint, removal of substrate PCB remediation waste will be difficult to



implement. Additionally, PCB Remediation Waste requires disposal as a hazardous waste requiring segregation and disposal at a hazardous waste landfill, of which there are none in the northeast. For these reasons, this alternative is less feasible and implementable than Alternative #2.

Risk Reduction and Associated Benefits

The 40 CFR 761 prescribed remediation is a proven method of reducing risk of exposure. Selective removal of PCBs and abatement of ACM allows for greater flexibility in disposal locations for the majority of the building components should future disposal occur. As exposure is eliminated with selective removal, this alternative is considered to reduce risk similarly to Alternative #2.

Cost Effectiveness Using the Net Present Worth of All Future Costs

Based on prior project and contractor experience and current estimates received from contractors, the estimated cost of this alternative is broken down below:

Programmatic Planning/Reporting	\$13,175
Engineering/Oversight/Reporting	\$25,000
Asbestos Abatement	\$64,945
Delineation and Substrate Sampling ¹	\$17,000
PCB Paint Removal & Disposal	\$450,000
Substrate Removal and Second floor select interior demo	\$500,000
PCB Remediation Waste T&D (concrete substrate removal) ²	\$35,000
PCB Bulk Product Waste T&D (painted drywall on second floor) ²	\$27,750
Confirmatory Sampling (Labor, Equipment and Analytical) ³	\$114,000
Total	\$1,246,870

¹assumes 50 bulk samples analyzed for PCBs

²assumes 25 cy (50 tons) at \$700 per ton for transport and disposal for remediation waste and 75 cy of PCB Bulk product waste at \$175 per ton that can only be removed as a whole component (i.e., drywall)

³Assumes 500 samples on 1.5-meter grid analyzed for PCBs

Green Remediation Potential

This alternative would require a similar amount of offsite disposal of impacted building materials and demolition debris as TSCA-regulated PCB Bulk Product Waste and C&D waste compared to Alternative #2, resulting in similar fuel consumption and greenhouse gas emissions during transport. However, the added PCB Remediation Waste would require disposal as a hazardous waste that typically requires transportation of greater distances for disposal. More materials and greenhouse gas emissions associated with laboratory analysis of extensive confirmatory/delineation sampling would also be required. It is possible to reduce transportation impacts by using local contractors; however, for these reasons, this alternative is considered to have less green remediation potential than Alternative #2.

Estimated Time to Reach “No Further Action”

Under this alternative, the estimated time to reach “No Further Action” would be dictated by confirmation sampling in the office building and the extent of PCB impacts. If several rounds of testing and removal are required, this would extend the timeline of implementation of this alternative several months. Targeted removal would increase the time and effort required to reach

the end goal for redevelopment. Therefore, this alternative is anticipated to take longer to reach “No Further Action” than Alternative #2.

4.2 JUSTIFICATION FOR THE SELECTED REMEDIAL ALTERNATIVE

The following table summarizes the comparison criteria and alternatives using a relative rank score. The top-ranking score is based on the total number of alternatives presented as part of this ABCA (3 alternatives), representing the best option for that comparison criteria.

Alternative	#1 No Action	#2 Complete Removal by Demolition	#3 PCB Remediation prior to Demolition
Effectiveness and Reliability	-	3	3
Feasibility and Ease of Implementation	-	3	2
Risk Reduction and Associated Benefits	-	3	3
Cost Effectiveness	-	3	2
Green Remediation Potential	-	3	2
Time to Reach “No Further Action”	-	3	2
Total Score	-	18	14

- cannot be scored as the alternative does not meet threshold criteria for risk reduction or regulatory compliance.

Based on the above matrix, cost and most practical ability to implement in conjunction with the redevelopment, the selected alternative is **Alternative #2, pre-demolition asbestos abatement and PCB Bulk Product Waste whole component removal by demolition**. This alternative is the most effective at reducing risk of exposure and is more easily implemented in a shorter time frame. Complete building removal will increase the flexibility needed for redevelopment design and also benefit the imminent redevelopment of the larger Site.

4.3 GREEN AND SUSTAINABLE REMEDIATION MEASURES FOR SELECTED ALTERNATIVE

To make the selected alternative greener, or more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort.

The selected alternative requires much less material/resources and fuel consumption than that required for the selective demolition and delineation/confirmatory sampling under Alternative #3. The selective alternative also allows for disposal of PCB Bulk Product Wastes at a local/regional landfill, reducing transportation impacts, as opposed to transportation to a hazardous waste disposal facility (required under Alternative #3), of which there are none in the northeast.

In addition, the cleanup contractor will be required to follow an idle-reduction policy and will be encouraged to use heavy equipment with advanced emissions controls operated on ultra-low sulfur diesel and/or fuel-efficient/alternative fuel vehicles and equipment. Other potential measures that



will be implemented where applicable, beneficial, or feasible to improve the overall sustainability of the project include:

- Protecting and conserving water.
- Carpooling for Site visits and on-site project meetings.
- Scheduling activities efficiently to minimize travel to and from the Site.
- Maximizing efficiency in the transportation and disposal of impacted materials off-Site.
- Submitting documents in digital format, rather than hard copy, unless otherwise required by EPA, the City and/or others, to save paper and resources.
- Optimizing the use of electronic and centralized communications for all project related correspondence and outreach to the local community, when feasible.
- Incorporating environmental sustainability into the future Site redevelopment such as utilizing energy efficient and renewable energy alternatives as well as green stormwater infrastructure to minimize developmental impacts on the natural environment.



5. SCHEDULE OF CLEANUP ACTIVITIES

The below schedule outlines activities that will be completed as part of the office/storage building remediation. Additional activities that fall outside the scope of this ABCA but are also planned to occur as part of larger Site redevelopment are detailed in the September 15, 2025, ABCA/RAP for the Site.

Task	Duration/Date
Submittal of Draft ABCA for PCB Remediation	October 15, 2025
NHDES and EPA Review Period	December 31, 2025
Draft ABCA for public review	January 28, 2026
30-day Public Comment Period	January 30 – March 1, 2026
Public Meeting	February 19, 2026
Finalized ABCA for PCB Remediation	March 2, 2026
Waste characterization sampling	February 2026
Office/storage building PCB demolition	March 2026



FIGURES







NOTES:
1. EXISTING CONDITIONS AND FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE AND ARE BASED ON INFORMATION OBTAINED FROM THE CITY OF LEBANON, USGS ORTHO IMAGES, NEW HAMPSHIRE OFFICE OF GIS, AND PRIOR ENVIRONMENTAL INVESTIGATIONS.

DRN BY: LAK	DATE: 12/8/2025	FIGURE 2A SITE PLAN OVERVIEW
CHKD BY: ASD	PROJECT: 21001623	
 Credere Associates, LLC 776 MAIN STREET WESTBROOK, MAINE Tel. 207.828.1272 Fax 207.887.1051 WWW.CREDERELLC.COM		KLEEN LAUNDRY FORMER DRY-CLEANING FACILITY 1 FOUNDRY STREET LEBANON, NEW HAMPSHIRE

SITE BOUNDARY

PARCEL BOUNDARIES

FORMER 25 MECHANIC ST
PARCEL

SITE FEATURES



NOTES:
1. EXISTING CONDITIONS AND FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE AND ARE BASED ON INFORMATION OBTAINED FROM THE TOWN OF LEBANON, ESRI ORTHO IMAGES, NEW HAMPSHIRE OFFICE OF GIS, AND FIELD WORK PERFORMED FROM MAY 2021 TO APRIL 2023.
2. IT IS UNCLEAR FROM HISTORICAL DOCUMENTATION WHERE TANK #4 (1,000-GALLON GASOLINE) WAS FORMERLY LOCATED. LOCATION OF TANK #1 IS PRESUMED FROM FILE.

DRN BY: LAK/NWW | DATE: 01/24/2025
CHKD BY: ASD | PROJECT: 21001623



Credere Associates, LLC

776 MAIN STREET
WESTBROOK, MAINE
Tel. 207.828.1272
Fax 207.887.1051
WWW.CREDERELLC.COM

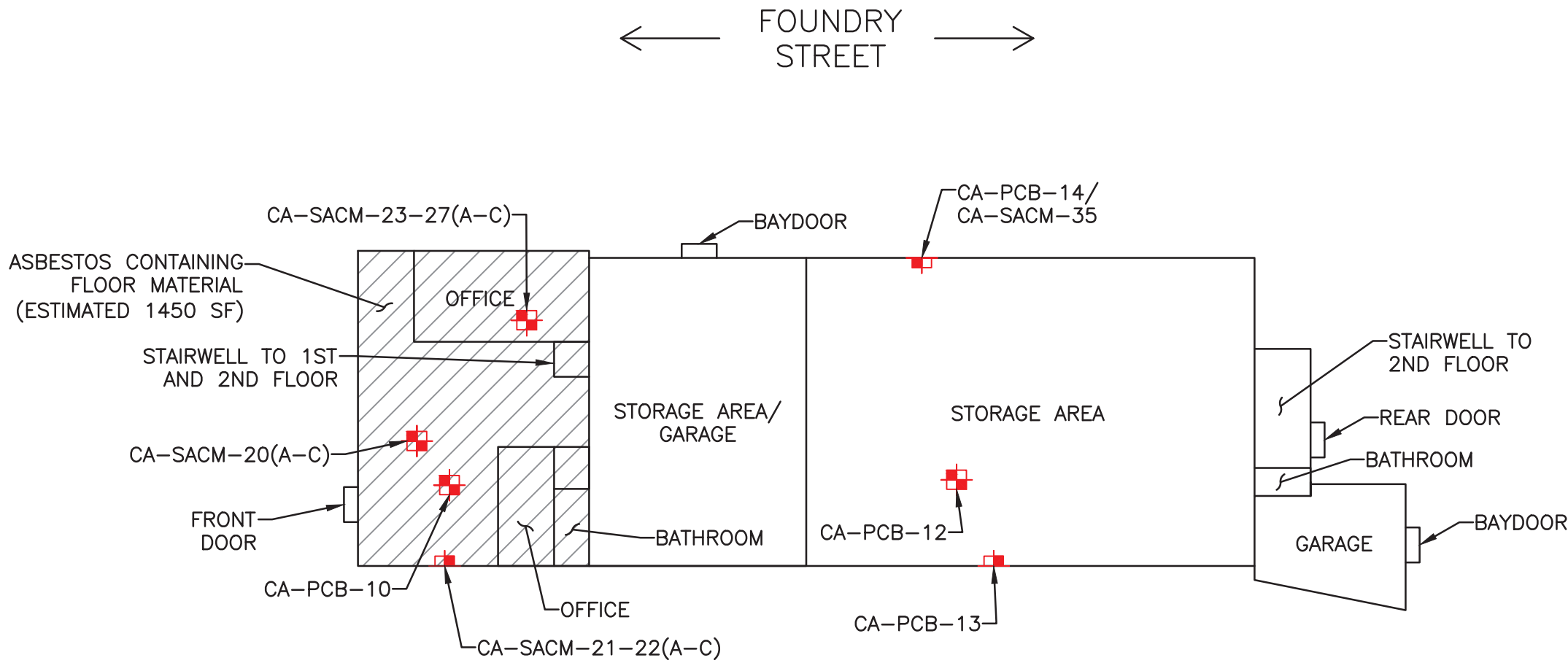
**FIGURE 2A
DETAILED SITE PLAN**

FORMER KLEEN LAUNDRY & DRYCLEANING
25 MECHANIC STREET & 1 FOUNDRY STREET
LEBANON, NEW HAMPSHIRE

- | | |
|---|---|
| <ul style="list-style-type: none">SITE BOUNDARYSITE BUILDING OUTLINEFORMER SITE BUILDING (DEMOED 2024)CRAWL SPACEFORMER 750-GALLON NO. 2 FUEL OIL USTFORMER 20,000-GALLON NO. 6 FUEL OIL USTABANDONED-IN-PLACE 20,000-GAL NO. 6 FUEL OIL UST(APPROX.) PCE/TCE IN SOIL >SRSPCE GW PLUME >AGQSCATCH BASINDECOMMISSIONED MONITORING WELLSOIL BORING/PIEZOMETER (2023)POLE-MOUNTED TRANSFORMERBRICK MANHOLE W/ FREE PRODUCTEXISTING MONITORING WELL | <ul style="list-style-type: none">PARCEL BOUNDARYINDOOR AIR SAMPLE LOCATIONSUBSLAB VAPOR SAMPLE LOCATIONINDOOR AIR/SUBSLAB VAPOR SAMPLE LOCATION2021 SOIL BORING2021 SOIL BORING/MONITORING WELL2021 SURFACE SOIL SAMPLE LOCATION2021 SOIL BORING LOCATIONSTORM SEWER DRAINAGE PIPEAPPROX. PETROLEUM PLUMEPROPANE TANK & TREESPCE >RESIDENTIAL SGSL OR IASL(APPROX.) PCE/TCE IN SOIL >SRSCROSS SECTION TRANSECT2-FOOT CONTOUR |
|---|---|

LEGEND

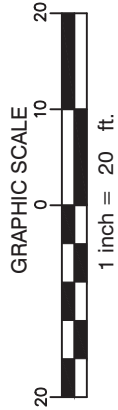
- ASBESTOS/PCB SAMPLE LOCATION
- ASBESTOS/PCB WALL SAMPLE LOCATION
- ASBESTOS CONTAINING FLOOR MATERIAL



HAZARDOUS BUILDING MATERIALS LOCATION PLAN
OFFICE/STORAGE BUILDING - FIRST FLOOR

FIGURE 3

FORMER KLEEN LAUNDRY AND DRY CLEANING
1 FOUNDRY STREET
LEBANON, NEW HAMPSHIRE



DRAWN BY: GWK
CHECKED BY: ASD

DATE: 11/07/2022
PROJECT: 21001623

CREDERE ASSOCIATES, LLC
776 MAIN STREET
WESTBROOK, MAINE 04092
FAX: 207.887.1051
TEL: 207.828.1272
WWW.CREDERELLC.COM

