



MEMORANDUM

26 April 2004
File No. 30630-001

TO: Rath, Young & Pignatelli
Sherilyn B. Young, Esq.

FROM: Haley & Aldrich, Inc.
James K. Barret, P.E., LSP

SUBJECT: Comments to Spill Prevention, Control, and Countermeasure Plan
Proposed Valley Motorsports Project
Tamworth, New Hampshire

This memo conveys comments to the Spill Prevention, Control, and Countermeasure Plan (SPCC) for the proposed Valley Motorsports Project located in Tamworth, New Hampshire. My comments are as follows:

Page 1 of the SPCC plan indicates that oils, greases and other lubricants will be stored in the several vehicle storage areas (“garage-mahals”) to be constructed at the site. No discussion is provided concerning how the independent owners/renters of these facilities will be monitored or inspected with regard to proper safety, storage and handling procedures of potentially toxic substances or basic best management practices and clean housekeeping.

Page 2 (second paragraph) indicates that the “motor fueling staging area” will be located within a bermed concrete pad and all storm water runoff from the pad will flow through an oil and grease separator before “combining with other storm water from the site.”. Although an oil and grease separator is capable of detaining floating product, dissolved contaminants are not intercepted and are discharged without treatment. The motor fueling area, as described in the SPCC plan, does not have secondary containment and the potential exists for uncontrolled oils, fuels and hazardous materials releases in this area to be discharged to surface water and wetlands and released from the site.

Page 2 (third paragraph) states that storm water collected in exterior containment areas will be “manually removed after inspection demonstrates that it is free from oil and hazardous materials”. How will the inspection be performed? Visual inspection is not capable of detecting dissolved concentrations of oil and hazardous materials that greatly exceed state and federal standards.

Page 2 (fourth paragraph) although limited areas with true secondary containment may exist at the proposed site, vast expanses of the track, other impervious surfaces and areas are connected via swales and culverts to storm water detention ponds that discharge without treatment to surface water. The potential exits for uncontrolled releases of fuels and hazardous materials to surface water and wetlands and discharged from the site.

How often will the “portable vehicle fueling system” described on Page 3, first paragraph be refilled, removed or returned to the site?

The SPCC Plan (Page 3) states that “Virgin materials (antifreeze, gear lube, motor oil, hydraulic oil etc) waste oils, virgin and waste solvents, and virgin and waste antifreeze may be stored, throughout the Site, in portable containers ranging in size from 1 pint to 55 gallons”. Based upon the planned presence of extensive culverts and drainage swales discharging to detention ponds and surface water at the site, it is likely that all but insignificant spills from these widely spread sources will impact surface water and wetlands and be discharged from the site.

Page 6 Section 5.3.1 Gasoline Deliveries item 4 indicates that CMI and guests will use the fuel pumps of the portable vehicle fueling system. Will CMI staff be present during all fueling activities or will these activities be unsupervised?

Page 6, Section 5.3.1 Gasoline Deliveries item 6 states “Any gasoline that is collected inside a secondary containment enclosure will be collected...” however, the motor fueling staging area described on page 2 of the plan is clearly not provided with secondary protection. Are fueling activities anticipated in other areas, where are they and what is the nature of their secondary protection?

Page 8, Section 9.2 Incident Spill indicates that CMI employees will only respond to incidental spills and non-incidental spills will be cleaned up by a contractor.

Appendix D of the SPCC Plan (first page) states that Medical Emergency Response Vehicles (MERVs) described as four wheel drive Ford 250 trucks, have “the ability to reach any potential accident site within 60 seconds of the accident taking place”. Simple arithmetic indicates that to be able to reach many portions of the site within 60 seconds of an accident taking place, the MERVs must be able to travel at extremely high speeds (based on the unlikely assumption that the accident notification occurs and the MERV vehicle responds instantaneously). It would seem reasonable to expect response times much longer than 60 seconds. Considering that the proposed paved racing and fueling areas of the site are either close to or hydraulically connected to the drainage swales, culverts, inlets and unlined stormwater retention basins, runoff and releases to the environment will be rapid.