

To: Bradford NH Zoning Board of Adjustment
From: Bradford NH Conservation Commission
Date: October 12, 2016

Re: application for special exception W. C. Heselton for a Motor Vehicle Salvage Yard on Center Road

The Bradford Conservation Commission is in favor of all efforts to recycle materials, including vehicles.

However, we are not in favor of this project for the following reasons:

- this town has had difficulty in the past controlling junk yards;
- a special exception carries forward with the property with unknown consequences from a less careful owner;
- pollution problems of this kind are very difficult or impossible to rectify;
- there is very little benefit in the form of tax income from such a small operation while there is great potential for harm to the environment;
- it is not consistent with the Master Plan because protection of natural resources and water quality in particular have ranked very highly in all Master Plans.

Please note the attached NH Department of Environmental Services fact sheet concerning potential hazards from auto salvage yards.

Stormwater runoff is a major concern with salvage yards. Although there would be little increase of impermeable surfaces that would increase that amount, precipitation on stored vehicles would create toxic runoff.

This property is in a high priority wildlife area and breaks into one of the largest remaining unfragmented areas in town representing a significant disruption. Wildlife Action Plan map attached.

We have questions about whether vehicles will be hauled via other logging roads from adjacent property of the same owner – which will necessitate a stream crossing.

A detailed site plan was not available and additional comments might be forthcoming.

If this project carries forward we would recommend the following conditions:

- The Motor Vehicle Salvage Yard will be adhering to Best Management Practices (as required by RSA 236) and as outlined by NH DES.
- This salvage yard becomes a member of the Green Yards program through NH Department of Environmental Services.
- A Storm Water Pollution Protection Plan (SWPPP) is implemented. DES provides a relatively easy way to develop this plan called a 'Template For Preparing A Storm Water Pollution Prevention Plan For Auto Salvage Yards.' The Automotive Recyclers Association also recommends the development of a Stormwater Pollution Prevention Plan (see <http://www.ecarcenter.org/SWPPP.htm>).
- The facility will be available for inspection by a designated official from the town of Bradford.

We think these measures are a reasonable and effective way to protect the town of Bradford against potential contamination by the industrial chemicals that are necessarily used in these businesses and which will linger long after the current owner.

Thank you for your consideration of this input.
J. Ann Eldridge, for the Bradford Conservation Commission

ENVIRONMENTAL Fact Sheet



29 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • www.des.nh.gov

WMD-SW-35

2010

Environmental Concerns at Auto Salvage Yards

The primary environmental concern at motor vehicle recycling facilities is the potential for groundwater and surface water contamination due to mishandling of vehicular fluids, including gasoline, diesel fuel, oil, transmission fluid, power steering and brake fluids, gear oil, and mineral spirits. Motor vehicle recyclers also generate a number of other wastes, including: mercury from light switch assemblies, HID head lamps, display screen back lighting, and ABS brake sensors; lead from lead-acid batteries, wheel weights and battery cable ends; chlorofluorocarbons (CFCs) and other refrigerants from air-conditioning units; sodium azide from air bags; asbestos from brake shoes and clutches; and waste tires.



Serious adverse impacts on environmental quality can result from mishandling any of these wastes. The impacts are summarized below.

- ✓ **Petroleum Hydrocarbons:** Gasoline, diesel fuels, and motor oil contain petroleum hydrocarbons. Petroleum hydrocarbons are toxic to aquatic life and some are suspected or known carcinogens. Those with a high affinity for sediments can persist over time in bottom sediments, where they can be toxic to benthic communities. They have the potential to move off site via stormwater and sediment runoff, either directly into surface waters or more commonly through storm sewers. In heavily impacted area, vertical migration of contaminants in groundwater can occur.
- ✓ **Heavy metals (lead, cadmium, chromium, zinc, copper, nickel, aluminum, arsenic and mercury):** Heavy metals can be toxic to aquatic life and can bio-accumulate in fish and shellfish. At a motor vehicle recycling facility, heavy metals can migrate to surface waters through stormwater runoff and into nearby soils through corrosion of the body and parts, leakage of motor fluids, dismantling operations, and improper handling and storage of vehicle components that contain heavy metals.
- ✓ **Acids:** At a motor vehicle recycling facility, sources of acids include batteries, solvents, and degreasers. Acids can affect soil chemistry, which in turn can adversely affect plants and human health, and can create conditions toxic to soil organisms, and result in soil contamination.
- ✓ **Suspended solids:** In high concentrations, suspended solids, such as heavy metals, can affect surface waters by reducing clarity and light penetration through the water column. This, in turn, can affect water temperature, plant growth and dissolved oxygen concentrations. Solids that settle to the riverbed or lakebed can smother plants and invertebrates and alter these benthic habitats that play important roles for fish and wildlife.

In addition to the above listed contaminants, a significant number of New Hampshire water supplies are contaminated with the gasoline additive, MtBE. Although MtBE is no longer used in our gasoline supplies, older vehicles in salvage yards may still contain gasoline with MtBE.

When operations are well-controlled and best management practices are implemented at a motor vehicle recycling facility, the risk of releasing contaminants is significantly reduced. The N.H. Green Yards Program works with motor vehicle recycling yards statewide to accomplish this. For additional information, visit www.des.nh.gov and search "Green Yards."

2015 HIGHEST RANKED WILDLIFE HABITAT BY ECOLOGICAL CONDITION

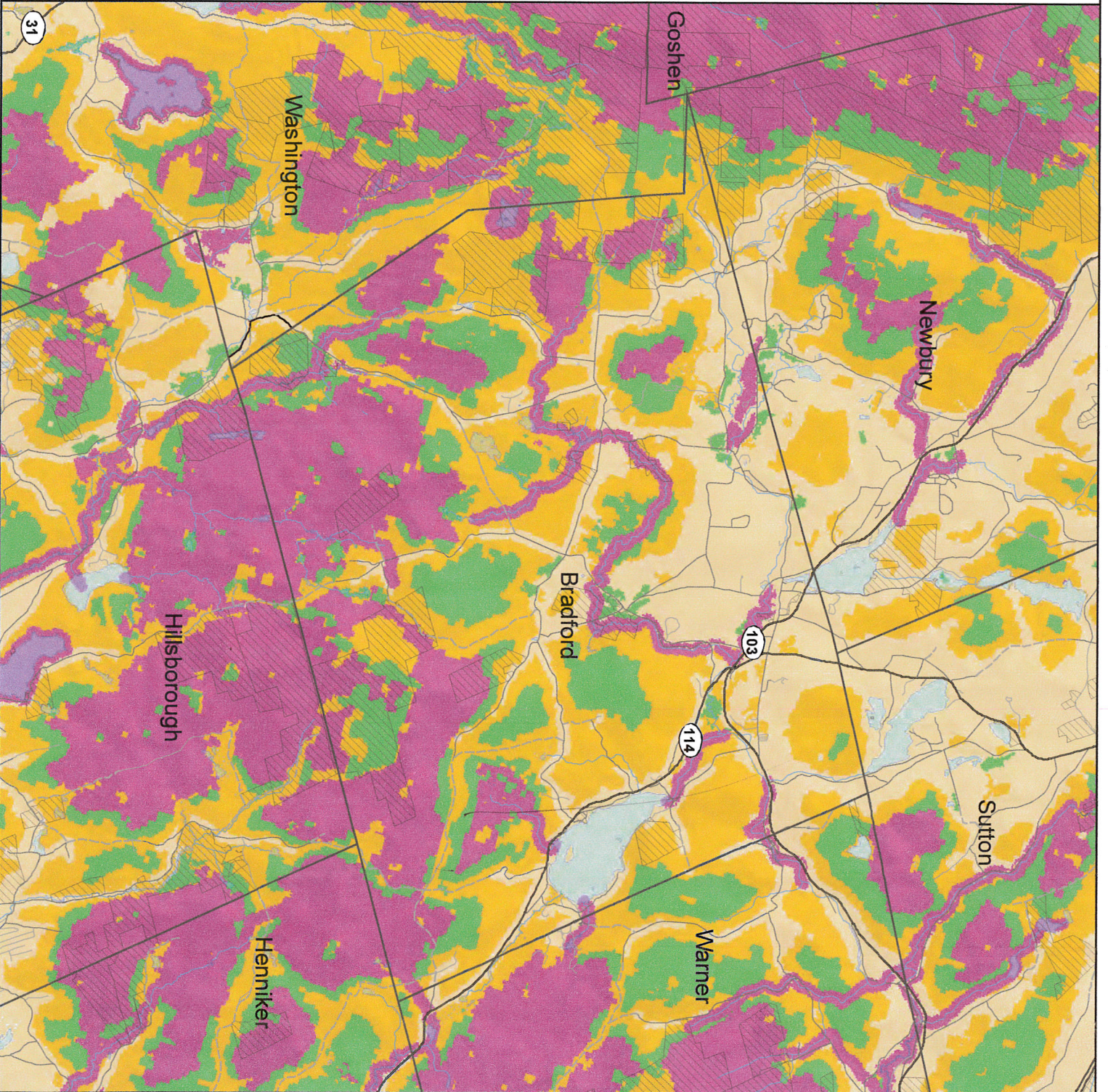
Highest Ranked Habitat in New Hampshire

Highest Ranked Habitat in the Biological Region

Biological region = TNC ecoregional subsection for terrestrial habitats or Aquatic Resource Mitigation region for wetlands and floodplain forest.

Supporting Landscapes

Conservation or public



Base map data provided by NH GRANIT (2015)
Not intended for legal use.

