



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

REQUEST FOR MORE INFORMATION

January 13, 2026

Mr. Gary Raddatz
Radius Recycling
25 Sandquist Street
Concord, NH 03301
(sent via email to: graddatz@rdus.com)

RE: Alteration of Terrain Permit Application AoT 251120-205
Radius Recycling Sandquist Facility Stormwater Improvements
25 Sandquist Street - Concord
Tax Map 793Z Lot 9-9

Dear Applicant:

The New Hampshire Department of Environmental Services (NHDES) is in receipt of an application and supporting plans and information, for an Alteration of Terrain Permit for the above referenced project. After review of the information submitted, the following items need to be addressed in order for NHDES to make a **final determination** on the application for a permit:

1. According to the DataCheck Results Letter for this project (NHB/DCT25-3181), coordination between the applicant and NHDES's Ecological Review Section is required pursuant to Env-Wq 1503.19(h) to address potential impacts to threatened and endangered species. Once the Ecological Review Section has completed its review, list the conservation measures on the plans and revise the details as necessary to meet the requirements. For questions regarding the DataCheck Results Letter, contact the Ecological Review Section at ecologicalreviews@des.nh.gov.
2. Your project, or a portion of it, is within one-quarter mile of a river designated under RSA 483. The local advisory committee for the designated river, the Upper Merrimack River LAC, provided comments in a letter dated December 15, 2025. We encourage you to address any issues that will make this project more successful for the applicant, the environment, and the community.
3. The drainage analysis must be stamped, signed and dated by a Professional Engineer registered in the State of NH.
4. The wetland scientist must stamp, sign and date the Existing Conditions Plan.
5. Add the county in which the project is located in to Section 7 of the application.
6. 100-Year Flood Plain: For Flood Zone AE with a known BFE, the flood plain line should follow the existing grade contours referenced to the same vertical datum as the FEMA flood map. Revise Section 7 of the application to note that a portion of the property is within the floodplain.
7. The plans include a note that states *Draft 60% Design Not For Construction*. If a permit is issued it will reference that the project be constructed in accordance with the approved plans. Future

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changes to the plans may require amending the permit.

8. Waiver Request:
NHDES hereby grants a waiver to the Site Specific Soil testing requirement, Env-Wq 1504.09(b)(3)b, because this project is a redevelopment of an existing site that consists mostly of impervious surfaces.
9. Drainage Analysis (Env-Wq 1504.09)
 - a. Submit a copy of the precipitation depth data table for each storm with project coordinates.
 - b. Use a time span of 0-72 hours in the post-development to be consistent with the pre-development.
10. Diversion Manhole (1P)
 - a. Trim out the concrete hatch to either side of the weir wall in the detail on Sheet C-902.
 - b. In the detail on Sheet C-902, the bypass pipe diameter and invert elevation are not consistent with the analysis and other plans. Revise as necessary.
 - c. Device #4, which represents the pumping station, should be a separate node. The 24" outlet from 1P should be routed to it. HydroCAD has a pump outlet option. Should this be used in this case?
11. Above Ground Storage Tank (2P)
 - a. Note the 12" overflow invert elevation and pipe location on the plans. The plans (CG-101) appear to label the overflow as two 6" PVC pipes.
 - b. There is a 12" forcemain from the AST to the primary treatment system. How is the flow controlled to 0.223 cfs to this outlet?
12. There are no details in the plans for the advanced treatment facility. Submit supporting information as necessary to ensure it complies with Env-Wq 1508. Include any necessary requirements in the I&M Manual.
13. Drainage Details & Notes:
 - a. Add the following to the erosion control blanket detail: *There shall be no plastic, or multi-filament or monofilament polypropylene netting or mesh with an opening size of greater than 1/8 inches material utilized.*
 - b. Specify seed mixes for temporary and permanent seeding of disturbed areas.
14. Source Control Plan (Env-Wq 1504.08): Submit a pdf copy of the NPDES Multi-Sector General Permit Stormwater Pollution Prevention Plan for the file.
15. Inspection and Maintenance Manual (Env-Wq 1507.07): Include I&M requirements for catchbasins and manholes in the manual.
16. After any necessary revisions to the HydroCAD analysis to respond to the above, submit a revised summary table of the 2-year, 10-year and 50-year pre- and post-development flows, and if necessary, the 2-year pre- and post-development runoff volumes or 1-year flow (pre), to show compliance with the requirements of Env-Wq 1507.05(b).
17. Env-Wq 1503.21(c) requires that the permit holder and a qualified engineer certify that the project was completed in accordance with the approved plans, or that deviations were made which did not require an amended or new permit. A permit condition will require this certification.

18. Please ensure your response to this Request for More Information (RFMI) meets Env-Wq 1503.15, including:
- a. State how each comment has been addressed.
 - b. Provide graphical revision callouts to identify any changes on the revised plans as a result of this RFMI or any other changes that may impact the AoT review.
 - c. Provide a PDF copy of all project documents that were modified in response to this RFMI.
 - d. Provide a PDF copy of the complete application pursuant to Env-Wq 1503.05(c), with all application documents current to reflect any modifications from the original application.

Please be aware that in accordance with RSA 485-A:17, if all the information requested above is not provided in a **single and complete** response within the next 120 days, **by May 13, 2026, your application will be denied.** If you have any questions, please call me at (603) 271-3568 or email at: michael.j.schlosser@des.nh.gov.

Sincerely,



Michael Schlosser, PE
Alteration of Terrain Bureau

ec: Concord Planning Board (planning@concordnh.gov; mbezanson@concordnh.gov)
Ross Tsantoulis, Woodard & Curran
Upper Merrimack River LAC
Tracie Sales NHDES Rivers Management and Protection Program
NHDES Ecological Review Section
Lea Anne Atwell, NHDES Hazardous Waste Remediation Bureau