APPENDIX 5
Suggested Notice of Intent Format

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 1
FIVE POST OFFICE SQUARE SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Request for General Permit Authorization to Discharge Noncontact cooling Water
Notice of Intent (NOI) to be covered by the General Permit

Noncontact Cooling Water General Permit (NCCWGP)
NPDES General Permits No. MAG250000 and NHG250000

A. Facility Information

1. Indicated applicable General Permit for discharge: MAG250000 ☒
NHG250000 ☐

2. Facility Information/Location:
Facility Name Neenah FR LLC
Street/PO Box 295 Park St City Great Barrington
State MA Zip Code 01236
Latitude 42.241484 Longitude -73.357242
Type of Business Manufacturing: Paper Coated & Laminated, Packaging
SIC Codes(s) 2671

3. Facility Mailing address (if different from Location Address):
Facility Name Same as above
Street/PO Box _____ City _____
State _____ Zip Code _____

4. Facility Owner:
Name Neenah Paper, Inc
E-mail matthew.hane@neenah.com
Street/PO Box 3460 Preston Ridge Way City Alpharetta
State GA Zip Code 30005
Contact Person Matthew Hane Tel 413-553-4355
Owner is (check one): Federal _____ State _____ Tribal _____ Private X
Other (describe) _____

5. Facility Operator (if different from above):
Legal Name _____
E-mail _____
Street/PO Box _____ City _____
State _____ Zip Code _____
Contact Person _____ Tel _____

6. Current permit coverage: yes☒ no☐
   a) Has a prior NPDES permit (individual or general permit coverage) been granted for the discharge that is listed on the NOI? yes☒ no☐ If Yes, permit number MAG250973
   b) Is the facility covered by an individual NPDES permit for other discharges? yes☐ no☒
   If yes, Permit Number: _____

c) Is there a pending NPDES application on file with EPA for this discharge? yes☒ no☐
If yes, date of submittal: 8/17/2017 and permit number, if available MAR054035

7. Attach a topographic map indicating the location of the facility and the outfall(s) to the receiving water.
Map attached? ☒

B. Discharge Information (attach additional sheets as needed):

1. Name of receiving water into which discharge will occur: Housatonic River
Freshwater ☒ Marine Water ☐
State Water Quality Classification Class 5
Type of Receiving Water Body (e.g., stream, river, lake, reservoir, estuary, etc.) River

2. Attach a line drawing or flow schematic showing water flow through the facility including sources of intake water, operations contributing to flow, treatment units, outfalls, and receiving water(s). **Line drawing or flow diagram attached?** ☒

3. Describe the discharge activities for which the owner/applicant is seeking coverage (e.g., building cooling, process line cooling, etc.) Non contact cooling water in process machine

4. Number of Outfalls 1 Latitude and Longitude to the nearest second for each Outfall. See EPA's siting tool at http:/www.epa.gov/tri/reporting/siting_tool. Attach additional pages if necessary.

Outfall # Latitude 42.1424 Longitude -73.2128
Outfall # Latitude Longitude
Outfall # Latitude Longitude

5. For each Outfall provide the following discharge information:

Outfall # 1
a) Maximum Daily Flow 1 MGD Average Monthly Flow .477 MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature 83 °F Average Monthly Temperature 57.2 °F
c) Maximum Monthly pH 8.3 s.u. Minimum Monthly pH 6.5 s.u.
d) Outfall's discharge is: continuous ☐ intermittent ☒ seasonal ☐

Outfall # _____
a) Maximum Daily Flow _____ MGD Average Monthly Flow _____ MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature _____ °F Average Monthly Temperature _____ °F
c) Maximum Monthly pH _____ s.u. Minimum Monthly pH _____ s.u.
d) Outfall's discharge is: continuous ☐ intermittent ☐ seasonal ☐

Outfall # _____
a) Maximum Daily Flow _____ MGD Average Monthly Flow _____ MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature _____ °F Average Monthly Temperature _____ °F
c) Maximum Monthly pH _____ s.u. Minimum Monthly pH _____ s.u.
d) Outfall's discharge is: continuous ☐ intermittent ☐ seasonal ☐

6. Is the source of the NCCW potable water? yes☐ no☒
If yes, EPA will calculate a Total Residual Chlorine effluent limit for your facility.

7. Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 45 MGD
Attach any calculation sheets used to support stream flow and/or dilution calculations.

8. **For facilities that discharge to Massachusetts surface waters:**
a) Submit the completed engineering calculation of the surface water temperature rise as shown in Attachment B of the General Permit. Calculation attached? ☒
b) Does the discharge occur in an Area of Critical Environmental Concern (ACEC)? yes☐ no☒
If yes, provide the name of ACEC _____
Note: See Part 3.4 and Appendix 1 of the General Permit for more information on ACEC.

C. Chemical Additives

1. Are any non-toxic neutralization and/or dechlorination chemicals used in the discharge(s)? yes☐ no☒

2. If yes, attach a listing of each chemical used. Include the chemical name and manufacturer; maximum and average daily quantity used on a monthly basis, as well as the maximum and average daily expected concentrations (mg/l) in the discharge, and the vendor's reported aquatic toxicity (NOAEL and/or LC_{50} in percent for typically acceptable aquatic organism).

3. Was the listing submitted with the facility's 2008 NCCWGP NOI? yes☐ no☒

D. NCCW Source Water Information

1.State the source of the NCCW (e.g., municipal water supply, private well, surface water withdrawal, etc.).
Source private well Name of Source Water North & South Well

2. Is the source water registered/permitted under MA Water Management Act or NHDES User Registration Rule (ENV WQ 2202)? yes☒ no☐ If yes, registration number 1-02-113.03 / 9P2-1-02-113.1

3. If the source water is groundwater (non-municipal well water), see Appendix 9 of the General Permit and submit effluent (and receiving water hardness) test results, as required in Part 5.4 of the General Permit.
Test results attached? ☒

4. Does the facility use both a primary and backup source of NCCW? yes☐ no☒ If yes, **attach information** that identifies and explains the primary and backup sources of NCCW and how often the backup supply was used in the past three years.

E. Best Technology Available for Cooling Water Intake Structures (CWISs)

If the facility's discharge is covered by this General Permit and the facility **withdraws non-contact cooling water from a surface water**, you are subject to the BTA requirements at Part 4.2 of the General Permit.

1. Are you subject to the BTA requirements of the General Permit? yes☐ no☒
a) If no, explain source is well water, no CWIS and skip to F.
b) If yes, was the facility-specific BTA description submitted with the facility's 2008 NCCW GP NOI? yes☐ no☐
c) If yes, does that description accurately describe the facility current operations and practices? yes☐ no☐

2. If the facility is subject to the General Permit's BTA requirements and is requesting coverage under the NCCWGP for the first time, or if you answered "No" to question E.1.c. above, attach the facility-specific BTA description as required in Part 4.2 of the General Permit. For additional information and guidance, see Section IV of the Fact Sheet.

Include in your description:

a) Measures to meet the General Permit Part 4.3.a general BTA requirements, including documentation that describes the facility's monitoring program for impinged fish and/or invertebrate; or the required alternative monitoring plan frequency and/or protocol.
b) A characterization of the source water body's aquatic life habitat in the vicinity of each CWIS during the seasons when the CWIS may be in use.
c) The attributes of the current CWIS.
d) The design measures of the CWIS.
e) The operation measures of the CWIS.
f) The historical occurrence of impinged fish for the past five years.
g) If applicable, a demonstration that the facility's intake rate is commensurate with a closed-cycle recirculation system.
h) Other components to reduce impingement and/or entrainment of aquatic life.

3. Provide the following information for each CWIS to support your attached facility-specific BTA description:
   a) The design capacity of the of the CWIS _____MGD
   b) Maximum monthly average intake of the CWIS during the previous five years _____MGD
   c) The month in which this flow reported in 3.b. occurred _____
   d) The maximum through-screen design intake velocity _____feet/second (fps)

4. For facilities where the CWIS is located on a freshwater river or stream, provide the following information:
   a) The source water's annual mean flow in MGD as available from USGS or other appropriate source _____ MGD
   b) The design intake flow as a % of the source water's annual mean flow _____ % Attach calculations if equal to or less than 5% of annual mean flow.
   c) The source water's 7Q10 _____ MGD
   d) The design intake flow as a percent of the source water's 7Q10 _____%

5. Provide a map showing the location of each cooling water intake structure; NCCW Outfall(s) and CWIS features referred to in the BTA description. **Map attached?** ☐

F. Endangered Species Act Eligibility Information

Using the instructions in Appendix 2 of the NCCW GP, which of the following criteria apply to your facility? USFWS Criteria: A ☐ B ☒ C ☐

1. If you selected USFWS criteria B, has consultation with the U.S. Fish and Wildlife Service been completed?
   yes ☒ no ☐

2. If consultation with US Fish & Wildlife Service and/or NOAA Fisheries Service was completed, was a written concurrence finding that the discharge is "not likely to adversely affect" listed species or critical habitat received?
   yes ☐ no ☒

3. Attach documentation of ESA eligibility for USFWS as required at Part 3.4 and Appendix 2 of the General Permit.
   Documentation attached? Yes

4. Please indicate if your facility **directly intakes water for non-contact cooling** from any of the following waterbodies:
   - ☐ Merrimack River
   - ☐ Connecticut River
   - ☐ Piscataqua River
   - ☐ Taunton River

EPA will consult with the National Marine Fisheries Service on cooling water intakes covered under this permit in areas (in the above waterbodies) of the endangered Shortnose Sturgeon and Atlantic Sturgeon.

G. National Historic Properties Act Eligibility

1. Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility site or in proximity to the discharge? yes☒ no☐

2. Have any State or Tribal Historic Preservation Officers been consulted in this determination? yes☐ no☒
   If yes, attach the results of the consultation(s).

3. Which of the three National Historic Preservation Act scenarios listed in Appendix 3, Section C have you met?
   ☐ 1 ☒ 2 ☐ 3

H. Supplemental Information

Please provide any supplemental information, including antidegradation review information applicable to new or increased discharges. Attach any analytical data used to support the application. Attach any certification(s) required by the General Permit.

I. Signature Requirements

The NOI must be signed by the operator in accordance with the signatory requirements of 40 CFR § 122.22 (see below) including the following certification:

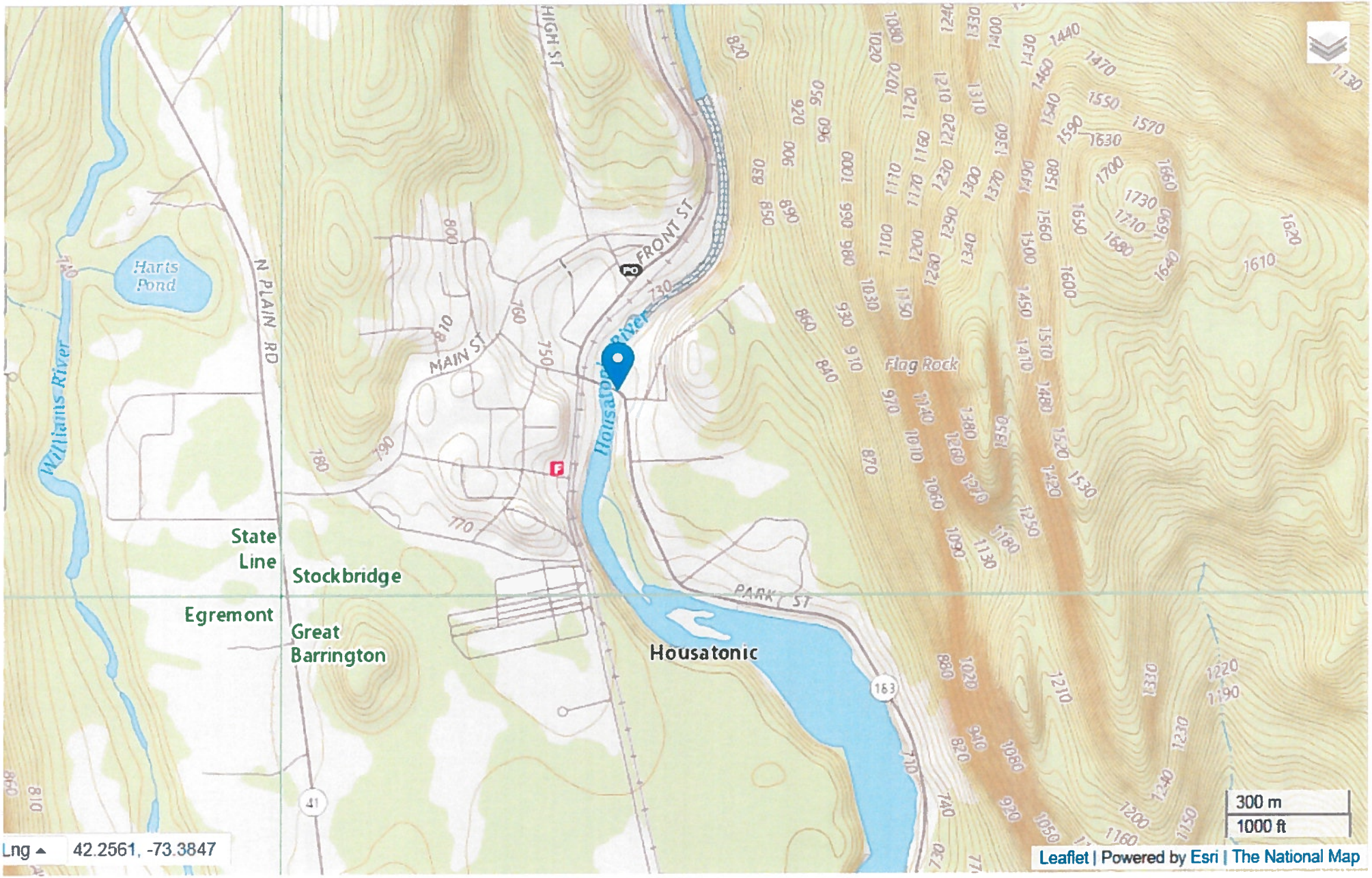
> I certify under penalty of law that (1) no biocides or other chemical additives except for those used for pH adjustment and/or dechlorination are used in the noncontact cooling water (NCCW) system; (2) the discharge consists solely of NCCW (to reduce temperature) and authorized pH adjustment and/or dechlorination chemicals; (3) the discharge does not come in contact with any raw materials, intermediate product, water product (other than heat) or finished product; (4) if the discharge of noncontact cooling water subsequently mixes with other wastewater (i.e. stormwater) prior to discharging to the receiving water, any monitoring provided under this permit will be only for noncontact cooling water; (5) where applicable, the facility has complied with the requirements of this permit specific to the Endangered Species Act and National Historic Preservation Act; and (6) this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.
>
> Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature _____ Date 9/28/17

Printed Name and Title Shawn Littrell, Mill Manager

Federal regulations require this application to be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively, or,
3. For a municipality, State, Federal or other public facility, by either a principal executive officer or ranking elected official.


Harts Pond
Williams River
N PLAIN RD
HIGH ST
FRONT ST
MAIN ST
Housatonic River
Flag Rock
PARK ST
State Line
Stockbridge
Egremont
Great Barrington
Housatonic
300 m
1000 ft
Lng ▲ 42.2561, -73.3847
Leaflet | Powered by Esri | The National Map

Outfall 1
Cooling
Housatonic River
183

Neenah FR LLC: Great Barrington: NCCW - Outfall #1

Well water as source

Max reported effluent = °F 66.3

Ma Cold Water Fishery upstream measured temp = °F 55

Max flow MGD = 1

7Q10 for Conn River MGD = 45

$$TF = \frac{mpTp + mrTr}{mp+mr}$$

$$= \frac{(1 *66.3) +(45*55)}{1 +45}$$

$$= \frac{66.3 +2475}{46}$$

$$= \frac{2541.3}{46}$$

= 55.246 °F

(change)Tr= TF -Tr

=55.246 - 55

= 0.246 °F

Detection Summary

Client: Neenah Technical Materials, Inc
Project/Site: NCCW Effluent

TestAmerica Job ID: 480-123053-1

Client Sample ID: NCCW EFFLUENT — Lab Sample ID: 480-123053-1

Analyte	Result	Qualifier	NONE	NONE	Unit	Dil Fac	D	Method	Prep Type
Field pH	7.08				SU	1		Field Sampling	Total/NA

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Chloride	5.5		0.50		mg/L	1		300.0	Total/NA

Client Sample ID: HOUSATONIC RIVER — Lab Sample ID: 480-123053-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Hardness as calcium carbonate	140		4.0		mg/L	1		SM 2340C	Total/NA

This Detection Summary does not include radiochemical test results.

Client Sample ID: NCCW EFFLUENT — **Lab Sample ID: 480-123053-1**
Date Collected: 08/22/17 09:40 — **Matrix: Water**
Date Received: 08/23/17 01:45

Method: 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Antimony	<0.020		0.020		mg/L		08/23/17 08:33	08/23/17 18:37	1
Arsenic	<0.015		0.015		mg/L		08/23/17 08:33	08/23/17 18:37	1
Cadmium	<0.0020		0.0020		mg/L		08/23/17 08:33	08/23/17 18:37	1
Chromium	<0.0040		0.0040		mg/L		08/23/17 08:33	08/23/17 18:37	1
Copper	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 18:37	1
Lead	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 18:37	1
Nickel	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 18:37	1
Silver	<0.0060		0.0060		mg/L		08/23/17 08:33	08/23/17 18:37	1
Iron	<0.050		0.050		mg/L		08/23/17 08:33	08/23/17 18:37	1
Zinc	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 18:37	1

Method: 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.00020		0.00020		mg/L		08/23/17 09:20	08/23/17 13:25	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	5.5		0.50		mg/L			08/25/17 18:54	1
Cr (VI)	<0.010		0.010		mg/L			08/23/17 04:18	1

Method: Field Sampling - Field Sampling

Analyte	Result	Qualifier	NONE	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	7.08				SU			08/22/17 09:40	1

Client Sample ID: HOUSATONIC RIVER — **Lab Sample ID: 480-123053-3**
Date Collected: 08/22/17 10:00 — **Matrix: Water**
Date Received: 08/23/17 01:45

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Hardness as calcium carbonate	140		4.0		mg/L			08/29/17 13:28	1

Method: 200.7 Rev 4.4 - Metals (ICP)

Lab Sample ID: MB 480-373438/1-A
Matrix: Water
Analysis Batch: 373691

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 373438

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Antimony	<0.020		0.020		mg/L		08/23/17 08:33	08/23/17 17:23	1
Arsenic	<0.015		0.015		mg/L		08/23/17 08:33	08/23/17 17:23	1
Cadmium	<0.0020		0.0020		mg/L		08/23/17 08:33	08/23/17 17:23	1
Chromium	<0.0040		0.0040		mg/L		08/23/17 08:33	08/23/17 17:23	1
Copper	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 17:23	1
Lead	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 17:23	1
Nickel	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 17:23	1
Silver	<0.0060		0.0060		mg/L		08/23/17 08:33	08/23/17 17:23	1
Iron	<0.050		0.050		mg/L		08/23/17 08:33	08/23/17 17:23	1
Zinc	<0.010		0.010		mg/L		08/23/17 08:33	08/23/17 17:23	1

Lab Sample ID: LCS 480-373438/2-A
Matrix: Water
Analysis Batch: 373691

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 373438

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Antimony	0.200	0.198		mg/L		99	85 - 115
Arsenic	0.200	0.200		mg/L		100	85 - 115
Cadmium	0.200	0.201		mg/L		101	85 - 115
Chromium	0.200	0.195		mg/L		98	85 - 115
Copper	0.200	0.201		mg/L		101	85 - 115
Lead	0.200	0.202		mg/L		101	85 - 115
Nickel	0.200	0.194		mg/L		97	85 - 115
Silver	0.0500	0.0477		mg/L		95	85 - 115
Iron	10.0	10.4		mg/L		104	85 - 115
Zinc	0.200	0.199		mg/L		100	85 - 115

Method: 245.1 - Mercury (CVAA)

Lab Sample ID: MB 480-373466/1-A
Matrix: Water
Analysis Batch: 373591

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 373466

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.00020		0.00020		mg/L		08/23/17 09:20	08/23/17 12:49	1

Lab Sample ID: LCS 480-373466/2-A
Matrix: Water
Analysis Batch: 373591

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 373466

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	0.00667	0.00612		mg/L		92	85 - 115

Lab Sample ID: 480-123053-1 MS
Matrix: Water
Analysis Batch: 373591

Client Sample ID: NCCW EFFLUENT
Prep Type: Total/NA
Prep Batch: 373466

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	<0.00020		0.00667	0.00618		mg/L		93	70 - 130

Lab Sample ID: 480-123053-1 MSD
Matrix: Water
Analysis Batch: 373591

Client Sample ID: NCCW EFFLUENT
Prep Type: Total/NA
Prep Batch: 373466

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Mercury	<0.00020		0.00667	0.00607		mg/L		91	70 - 130	2	20

Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 480-373984/28
Matrix: Water
Analysis Batch: 373984

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	<0.50		0.50		mg/L			08/25/17 17:25	1

Lab Sample ID: LCS 480-373984/27
Matrix: Water
Analysis Batch: 373984

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Chloride	50.0	48.0		mg/L		96	90 - 110

Method: SM 2340C - Hardness, Total (mg/l as CaC03)

Lab Sample ID: MB 480-374477/3
Matrix: Water
Analysis Batch: 374477

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Hardness as calcium carbonate	<2.0		2.0		mg/L			08/29/17 13:28	1

Lab Sample ID: LCS 480-374477/4
Matrix: Water
Analysis Batch: 374477

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Hardness as calcium carbonate	213	224		mg/L		105	90 - 110

Lab Sample ID: 480-123053-3 MS
Matrix: Water
Analysis Batch: 374477

Client Sample ID: HOUSATONIC RIVER
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Hardness as calcium carbonate	140		200	336		mg/L		98	74 - 130

Lab Sample ID: 480-123053-3 MSD
Matrix: Water
Analysis Batch: 374477

Client Sample ID: HOUSATONIC RIVER
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Hardness as calcium carbonate	140		200	340		mg/L		100	74 - 130	1	15

Method: SM 3500 CR B - Chromium, Hexavalent

Lab Sample ID: MB 480-373424/3
Matrix: Water
Analysis Batch: 373424

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cr (VI)	<0.010		0.010		mg/L			08/23/17 04:18	1

Lab Sample ID: LCS 480-373424/4
Matrix: Water
Analysis Batch: 373424

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Cr (VI)	0.0500	0.0498		mg/L		100	85 - 115

Lab Sample ID: 480-123053-1 DU
Matrix: Water
Analysis Batch: 373424

Client Sample ID: NCCW EFFLUENT
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Cr (VI)	<0.010		<0.010		mg/L		NC	15

Metals

Prep Batch: 373438

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	200.7	
MB 480-373438/1-A	Method Blank	Total/NA	Water	200.7	
LCS 480-373438/2-A	Lab Control Sample	Total/NA	Water	200.7	

Prep Batch: 373466

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	245.1	
MB 480-373466/1-A	Method Blank	Total/NA	Water	245.1	
LCS 480-373466/2-A	Lab Control Sample	Total/NA	Water	245.1	
480-123053-1 MS	NCCW EFFLUENT	Total/NA	Water	245.1	
480-123053-1 MSD	NCCW EFFLUENT	Total/NA	Water	245.1	

Analysis Batch: 373591

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	245.1	373466
MB 480-373466/1-A	Method Blank	Total/NA	Water	245.1	373466
LCS 480-373466/2-A	Lab Control Sample	Total/NA	Water	245.1	373466
480-123053-1 MS	NCCW EFFLUENT	Total/NA	Water	245.1	373466
480-123053-1 MSD	NCCW EFFLUENT	Total/NA	Water	245.1	373466

Analysis Batch: 373691

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	200.7 Rev 4.4	373438
MB 480-373438/1-A	Method Blank	Total/NA	Water	200.7 Rev 4.4	373438
LCS 480-373438/2-A	Lab Control Sample	Total/NA	Water	200.7 Rev 4.4	373438

General Chemistry

Analysis Batch: 373424

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	SM 3500 CR B	
MB 480-373424/3	Method Blank	Total/NA	Water	SM 3500 CR B	
LCS 480-373424/4	Lab Control Sample	Total/NA	Water	SM 3500 CR B	
480-123053-1 DU	NCCW EFFLUENT	Total/NA	Water	SM 3500 CR B	

Analysis Batch: 373984

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	300.0	
MB 480-373984/28	Method Blank	Total/NA	Water	300.0	
LCS 480-373984/27	Lab Control Sample	Total/NA	Water	300.0	

Analysis Batch: 374477

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-3	HOUSATONIC RIVER	Total/NA	Water	SM 2340C	
MB 480-374477/3	Method Blank	Total/NA	Water	SM 2340C	
LCS 480-374477/4	Lab Control Sample	Total/NA	Water	SM 2340C	
480-123053-3 MS	HOUSATONIC RIVER	Total/NA	Water	SM 2340C	
480-123053-3 MSD	HOUSATONIC RIVER	Total/NA	Water	SM 2340C	

Field Service / Mobile Lab

Analysis Batch: 373465

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-123053-1	NCCW EFFLUENT	Total/NA	Water	Field Sampling	

Client Sample ID: NCCW EFFLUENT

Lab Sample ID: 480-123053-1

Date Collected: 08/22/17 09:40

Matrix: Water

Date Received: 08/23/17 01:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	200.7			373438	08/23/17 08:33	EMB	TAL BUF
Total/NA	Analysis	200.7 Rev 4.4		1	373691	08/23/17 18:37	AMH	TAL BUF
Total/NA	Prep	245.1			373466	08/23/17 09:20	MVZ	TAL BUF
Total/NA	Analysis	245.1		1	373591	08/23/17 13:25	MVZ	TAL BUF
Total/NA	Analysis	300.0		1	373984	08/25/17 18:54	RJS	TAL BUF
Total/NA	Analysis	SM 3500 CR B		1	373424	08/23/17 04:18	KMB	TAL BUF
Total/NA	Analysis	Field Sampling		1	373465	08/22/17 09:40	FLD	TAL BUF

Client Sample ID: HOUSATONIC RIVER

Lab Sample ID: 480-123053-3

Date Collected: 08/22/17 10:00

Matrix: Water

Date Received: 08/23/17 01:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 2340C		1	374477	08/29/17 13:28	DSC	TAL BUF

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Accreditation/Certification Summary

Client: Neenah Technical Materials, Inc
Project/Site: NCCW Effluent

TestAmerica Job ID: 480-123053-1

Laboratory: TestAmerica Buffalo

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	EPA Region	Identification Number	Expiration Date
Massachusetts	State Program	1	M-NY044	06-30-18

The following analytes are included in this report, but are not accredited/certified under this accreditation/certification:

Analysis Method	Prep Method	Matrix	Analyte
200.7 Rev 4.4	200.7	Water	Iron
200.7 Rev 4.4	200.7	Water	Silver
200.7 Rev 4.4	200.7	Water	Zinc
300.0		Water	Chloride

The following analytes are included in this report, but accreditation/certification is not offered by the governing authority:

Analysis Method	Prep Method	Matrix	Analyte
Field Sampling		Water	Field pH
SM 3500 CR B		Water	Cr (VI)

Method Summary

Client: Neenah Technical Materials, Inc
Project/Site: NCCW Effluent

TestAmerica Job ID: 480-123053-1

Method	Method Description	Protocol	Laboratory
200.7 Rev 4.4	Metals (ICP)	EPA	TAL BUF
245.1	Mercury (CVAA)	EPA	TAL BUF
300.0	Anions, Ion Chromatography	MCAWW	TAL BUF
SM 2340C	Hardness, Total (mg/l as CaC03)	SM	TAL BUF
SM 3500 CR B	Chromium, Hexavalent	SM	TAL BUF
Field Sampling	Field Sampling	EPA	TAL BUF

Protocol References:

EPA = US Environmental Protection Agency

MCAWW = "Methods For Chemical Analysis Of Water And Wastes", EPA-600/4-79-020, March 1983 And Subsequent Revisions.

SM = "Standard Methods For The Examination Of Water And Wastewater",

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Sample Summary

Client: Neenah Technical Materials, Inc
Project/Site: NCCW Effluent

TestAmerica Job ID: 480-123053-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-123053-1	NCCW EFFLUENT	Water	08/22/17 09:40	08/23/17 01:45
480-123053-3	HOUSATONIC RIVER	Water	08/22/17 10:00	08/23/17 01:45

TestAmerica Buffalo
10 Hazelwood Drive
Amherst, NY 14228-2298
Phone (716) 691-2600 Fax (716) 691-7991

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Client Information	Sampler: A. Mordell	Lab PM: Hartmann, Steve	Carrier Tracking No(s): 360-Westfield	COC No: 480-101153-24050.1
Client Contact: Matthew Hane	Phone:	E-Mail: steve.hartmann@testamericainc.com		Page: Page 1 of 1
Company: Neenah Technical Materials, Inc				Job #
Address: 448 Hubbard Ave	Due Date Requested:			
City: Pittsfield	TAT Requested (days):			
State, Zip: MA, 01201				
Phone:	PO #: 333288556			
Email: matthew.hane@neenah.com	WO #:			
Project Name: NCCW Effluent	Project #: 48016593			
Site:	SSOW#:			

Analysis Requested

480-123053 COC

Preservation Codes:

A - HCL	M - Hexane
B - NaOH	N - None
C - Zn Acetate	O - AsNaO2
D - Nitric Acid	P - Na2O4S
E - NaHSO4	Q - Na2SO3
F - MeOH	R - Na2S2O3
G - Amchlor	S - H2SO4
H - Ascorbic Acid	T - TSP Dodecahydrate
I - Ice	U - Acetone
J - DI Water	V - MCAA
K - EDTA	W - pH 4-5
L - EDA	Z - other (specify)

Other:

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	300.0_28D - Chloride	200.7, 245.1	FieldSampling - pH	SUBCONTRACT - Gross Alpha	SUBCONTRACT - Radium 226 + 228	SUBCONTRACT - Uranium	3500_CR_B - Chrome (VI)	2340C - Hardness	Total Number of containers	Special Instructions/Note:
			Preservation Code				N	D	N	D	D	D	N	D		
NCCW Effluent	8/22/17	0940	G	Water			X	X	X	X	X	X	X			
NCCW Influent	8/22/17	1030	G	Water				X								
Housatonic River	8/22/17	1000	G	Water										X		

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐ Radiological

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months

Deliverable Requested: I, II, III, IV, Other (specify)

Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:

Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
	8/22/17 1100	TAL		8-23-17 0145	TAL
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

Custody Seals Intact: Δ Yes Δ No	Custody Seal No.:	Cooler Temperature(s) °C and Other Remarks:
		3.1 #1

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8/30/2017

Sample Summary

Client: Neenah Technical Materials, Inc
Project/Site: NCCW Effluent

TestAmerica Job ID: 480-123053-2

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-123053-1	NCCW EFFLUENT	Water	08/22/17 09:40	08/23/17 01:45

SUBCONTRACTED DATA

LABORATORY REPORT

If you have any questions concerning this report, please do not hesitate to call us at (800) 332-4345 or (574) 233-4777.

STATE CERTIFICATION LIST

State	Certification	State	Certification
Alabama	40700	Missouri	880
Alaska	IN00035	Montana	CERT0026
Arizona	AZ0432	Nebraska	NE-OS-05-04
Arkansas	IN00035	Nevada	IN00035
California	2920	New Hampshire*	2124
Colorado	IN035	New Jersey*	IN598
Colorado Radiochemistry	IN035	New Mexico	IN00035
Connecticut	PH-0132	New York*	11398
Delaware	IN035	North Carolina	18700
Florida*	E87775	North Dakota	R-035
Georgia	929	Ohio	87775
Hawaii	IN035	Oklahoma	D9508
Idaho	IN00035	Oregon (Primary AB)*	4074-001
Illinois*	200001	Pennsylvania*	68-00466
Illinois Microbiology	17767	Puerto Rico	IN00035
Illinois Radiochemistry	IN00035	Rhode Island	LAO00343
Indiana Chemistry	C-71-01	South Carolina	95005
Indiana Microbiology	M-76-07	South Dakota	IN00035
Iowa	098	Tennessee	TN02973
Kansas*	E-10233	Texas*	T104704187-15-8
Kentucky	90056	Texas/TCEQ	TX207
Louisiana*	LA170006	Utah*	IN00035
Maine	IN00035	Vermont	VT-8775
Maryland	209	Virginia*	460275
Massachusetts	M-IN035	Washington	C837
Michigan	9926	West Virginia	9927 C
Minnesota*	018-999-338	Wisconsin	999766900
Mississippi	IN035	Wyoming	IN035
EPA	IN00035		

*NELAP/TNI Recognized Accreditation Bodies

Revision date: 08/28/2017

eurofins | Eaton Analytical

110 South Hill Street
South Bend, IN 46617
Tel: (574) 233-4777
Fax: (574) 233-8207
1 800 332 4345

Laboratory Report

Client: TestAmerica - Buffalo

Attn: Steve Hartmann
10 Hazelwood Drive
Amherst, NY 14228

Report: 396498
Priority: Standard Written
Status: Final
PWS ID: Not Supplied

Sample Information

EEA ID #	Client ID	Method	Collected Date / Time	Collected By:	Received Date / Time
3764978	(480-123053-1) NCCW Effluent	200.8	08/22/17 09:40	Client	08/24/17 08:30
3764978	(480-123053-1) NCCW Effluent	7110 B	08/22/17 09:40	Client	08/24/17 08:30
3764979	(480-123053-1) NCCW Effluent	7500-Ra B	08/22/17 09:40	Client	08/24/17 08:30
3764979	(480-123053-1) NCCW Effluent	7500-Ra D	08/22/17 09:40	Client	08/24/17 08:30

Report Summary

Note: Sample containers were provided by the client.

Detailed quantitative results are presented on the following pages. The results presented relate only to the samples provided for analysis.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call Kelly Trott at (574) 233-4777.

Note: This report may not be reproduced, except in full, without written approval from EEA.

Kelly Trott Analytical Services Manager — 09/15/2017

Authorized Signature | Title | Date

Client Name: TestAmerica - Buffalo
Report #: 396498

Client Name: TestAmerica - Buffalo

Report #: 396498

Sampling Point: (480-123053-1) NCCW Effluent

PWS ID: Not Supplied

Radionuclides

Analyte ID #	Analyte	Method	Reg Limit	MDA 95**	MRL	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-61-1	Uranium	200.8	20.1 *	0.67	0.67	0.49 ± 0.06	pCi/L	09/07/17 14:00	09/07/17 15:48	3764978
---	Gross Alpha	7110 B	15 *	0.83	3.0	**1.5 ± 1.0**	pCi/L	08/29/17 12:10	09/13/17 19:55	3764978
13982-63-3	Radium-226	7500-Ra B	---	0.37	1.0	**0.96 ± 0.50**	pCi/L	09/08/17 11:45	09/12/17 18:00	3764979
15262-20-1	Radium-228	7500-Ra D	---	0.45	1.0	**0.62 ± 0.46**	pCi/L	09/08/17 11:45	09/14/17 16:29	3764979
---	Combined Radium	calc.	5 *	0.45	1.0	**1.58 ± 0.68**	pCi/L	09/08/17 11:45	09/14/17 16:29	3764979

** Minimum Detectable Activity (MDA95) shall be that concentration which can be counted with a precision of plus or minus 100% at the 95 % confidence level.

† EEA has demonstrated it can achieve these report limits in reagent water, but can not document them in all sample matrices.

Reg Limit Type:	MCL	SMCL	AL
Symbol:	*	^	!

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

In Reply Refer To:
Consultation Code: 05E1NE00-2017-SLI-2430
Event Code: 05E1NE00-2017-E-05300
Project Name: Neenah - Great Barrington - NOI - 2017NCCWGP

August 10, 2017

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the

human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2017-SLI-2430

Event Code: 05E1NE00-2017-E-05300

Project Name: Neenah - Great Barrington - NOI - 2017NCCWGP

Project Type: ** OTHER **

Project Description: Neenah has purchased operations and is leasing location space that includes non contact cooling water process general permit to discharge to Housatonic River.

Project Location:

Approximate location of the project can be viewed in Google Maps:
https://www.google.com/maps/place/42.24091586673356N73.35811117334183W

Counties: Berkshire, MA

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

Mammals

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

There are no critical habitats within your project area under this office's jurisdiction.