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P.N. 2805.003.01

November 1, 2005

Ms. Marelyn Toro
Environmental Assistant
U.S. EPA Region I, Municipal Permits Branch
Office of Ecosystem Protection
One Congress Street, Suite 1100
Boston, MA 02114-2023

NOV - 4 2005

RE: September, 2005 – FINAL NPDES Monitoring Report for Groundwater Treatment System Combined HVEC (DEP RTN# 3-0981) and Bellofram (DEP RTN# 3-0669) Sites, Burlington, MA, NPDES Permit Exclusion Reference #02-038

Dear Mr. Hackler:

On January 31, 2002, the EPA granted a NPDES Permit Exclusion for the groundwater recovery and treatment system at the former HVEC and Bellofram Sites in Burlington, Massachusetts. This report is submitted to document the results of groundwater analyses conducted on treatment system samples collected during September 2005, as required by the Permit Exclusion. GeoTrans was recently notified that the HVEC/Bellofram sites have rolled under the new Remediation General Permit (RGP) which became available on September 9, 2005. GeoTrans was notified of this on September 30, 2005 and was also explained that the permit becomes effective 30 days after the notification. The month of September 2005 is still under the NPDES permit exclusion; therefore this is the last NPDES monitoring report. As required by the RGP, for the month of October, 2005 and from then on, a letter will be submitted only if there is a permit exceedance. Results of sampling, monitoring, testing, and analysis will be summarized on a monthly form provided in Appendix VIII of the RGP. These forms will be kept on-site and copies will be filed at the GeoTrans, Inc. office.

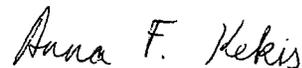
The new combined treatment system started operation on June 17, 2002. During September 2005, the volume of water treated and discharged was recorded, maintenance checks were conducted, and the water and air were sampled on September 22nd. The average pumping rate from July 25th to September 29th was 48.9 gallons per minute. The total discharged volume over the two-month period was 4,577,200 gallons; an average of 2,288,600 gallons of water was removed in August and September each. During these 66 days of operation, there was a total of 31 hours of downtime. The downtime was due to carbon change and high water level in the air stripper sump. The flow rate of the sump pump was increased to prevent this problem from

happening again. Table 1 details maintenance activities and a summary of treatment system parameters.

Water quality sampling and analysis was performed in accordance with the NPDES Permit Exclusion and site specific QAPP. Table 2 indicates the date influent and effluent water samples were collected. Water samples were collected in appropriate sample containers provided by the laboratory, and kept at 4° Celsius until received by the laboratory under a chain-of-custody. Water samples were analyzed for Target Compound List Volatile Organic Compounds (TCL VOCs) using EPA Method 8260B. Columbia Analytical Services in Rochester, New York, performed sample analyses. Results of the water sample analyses are summarized in Table 2. The effluent sample analysis indicates that PCE concentration in the effluent exceeded the discharge criterion (concentration was 5.7 µg/L and the criterion for PCE is 5 µg/L.) The air stripper trays were cleaned on October 4 and 24 and the effluent and influent were re-sampled on October 17 to confirm that the cleaning returns the air stripper performance to its design specification. The effluent sample collected on October 17 did not have any VOCs detected above the discharge criteria.

The air samples were collected on 9/22/05 using Summa® canisters. The canisters were shipped overnight to Columbia Analytical Services in Simi Valley, California. The air samples were analyzed for site-specific VOCs by EPA Method TO-15. The results listed in Table 3 indicate that the vapor-phase carbon adsorber reduced VOC concentrations by 100%.

Sincerely,



Anna F. Kekis
Project Engineer

Enclosures

cc: Mr. David LaPusata, MADEP
Mr. Todd Dresser, Burlington Board of Health
Mr. Mike James, High Voltage Engineering Corp.
Mr. William Forbush III, Piper Rudnick
Ms. Susan Hall, The Fairchild Corporation
Ms. Kirsten Phelps, Burlington Conservation Commission
Ms. Olga Vergara, EPA Region 1, Municipal Assistance Unit
Mr. Paul Nugent, American Landmark Partners
Mr. M. Mazgelis, Oracle Corporation

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Table 3. Summary of Air Analyses

Sample ID	Sample Description	Date	Detected Parameters (PPB V/V) EPA Method TO-15						
			PCE	1,1,1-TCA	TCE	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCA
INF-092205AIR	Influent	9/22/05	560	310	160	56	21	1.5 U	16
EFF-092205AIR	Effluent	9/22/05	0.18U	0.22U	0.41	0.31U	0.31U	0.31U	0.30U

Notes:
 1,1-DCE=1,1-Dichloroethene
 CIS-1,2-DCE=Cis-1,2-Dichloroethene
 trans-1,2-DCE=trans-1,2-Dichloroethene
 PCE=Tetrachloroethylene
 1,1,1-TCA=1,1,1-Trichloroethane
 TCE=Trichloroethene
 J=Parameter was detected below the instrument's reporting limit (result is estimated)
 0.2U=Parameter was not detected above the detection limit of 1 ppb (v/v).