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MAG 9/10/07*

October 5, 2005

United States Environmental Protection Agency - Region 1
RGP- NOC Processing
Municipal Assistance Unit (CMU)
One Congress Street, Suite 1100
Boston, MA 02114-2023

OCT - 7 2005

Re: Certification of Facility covered under a NPDES Permit Exclusion with an Individual NPDES Permit at EPA (Reference #00-174 - Station System)

Mobil Service Station #12689 (Formerly 01-PLH)-Station System
134 Cedar Street
Milford, Massachusetts
EPA NPDES Exclusion Reference #00-174
MADEP Release Tracking Number 2-13321
MADEP Site No. 2-0682

To Whom It May Concern,

On behalf of Mobil Business Resources Corporation (Mobil), a subsidiary of Exxon Mobil Corporation (ExxonMobil), Groundwater & Environmental Services, Inc. (GES) is submitting the required Certification Letter to indicate that ExxonMobil agrees to transfer the existing above-referenced National Pollutant Discharge Elimination System (NPDES) Permit Exclusion to the new Remediation General Permit (RGP), which went into effect September 2005. The permit is associated with the vapor enhanced groundwater extraction/soil vapor extraction (VEGE/SVE) remedial system located at the above-referenced address.

The subject site's NPDES Permit Exclusion (Reference #00-174) was issued by the Environmental Protection Agency (EPA) on August 9, 2000. Subsequently a formal NPDES Permit Application for an Individual Permit was submitted to EPA on November 8, 2001. The Station System has been operating since July 2001.

In response to the November 3, 2004 EPA "Jason" letter associated with the proposed RGP, in December 2004 GES submitted to EPA the required preliminary Certification Form, stating that GES and ExxonMobil selected the proposed RGP coverage. A copy of the December 2004 Certification Form is attached to this letter.

According to the Part I- Section B of the RGP, since only minor changes (presented further below) have been made to the discharge operations associated with the Station System since the submission of the Individual Permit Application, this certification letter

is serving in lieu of a Notice of Intent (NOI). Following are the minor changes to the treatment associated with the Station System, which occurred since 2001:

- Decrease in flow volume and petroleum impact concentrations, as indicated in monthly Discharge Monitoring Reports (DMR) submitted to EPA;
- Although the change does not affect the groundwater treatment, the original air treatment associated with the SVE component of the Station System was performed via a catalytic oxidizer which was replaced with two 200-pound vapor phase granular activated carbon (VGAC) units;
- The Facility/Site Owner address and telephone number have been changed to:
David Baker
Exxon Mobil Corporation – 52 Beacham Street, Everett, MA 02149
Tel: 617-381-2807

Based on the historical and current site data presented in the 2001 Individual Permit Application and in subsequent DMRs, GES and ExxonMobil believe that the discharge associated with the Station System fall under RGP Sub-Category I-A (Petroleum related Site Remediation - Gasoline Only sites).

In accordance to the applicable new RGP requirements, GES will continue to operate, monitor and submit monthly reports under the requirements of the existing NPDES Exclusion permit until a RGP is received from your office and/or goes into effect. Once received, GES is expecting to continue to operate the Station System under the applicable RGP requirements for RGP Sub-Category I-A

If you have any questions about the enclosed Certification Letter, please feel free to contact the undersigned at (978) 392-0090.

Sincerely,

GROUNDWATER & ENVIRONMENTAL SERVICES, INC.



Paul McKinlay
Project Manager



Christophe M. Henry, PE, LSP
Senior Project Engineer

Attachment: Copy of December 2004 Certification Form

C: Mr. Michael O'Brien- EPA- NPDES Exclusion Program
Mobil File

Certification of Facilities Currently Covered by NPDES "Exclusion Letters" Which Have Submitted NPDES Applications to EPA NE



I, Christophe M. Henry, representing Mobil Business Resources Corp., request
(name of certifying official) (name of company owner of site)
Mobil Station No. 12689 (Station System)
that the Milford, MA for which an NPDES application was submitted
(name of site or facility)

on 11/08/01 be covered by (✓ check one): Permit Exclusion Reference #00-174
(date mm/dd/yy) Dated 08/09/00

Remediation General Permit (RGP) | An individual NPDES permit

Additionally, I certify that the information contained in the previously submitted application for an individual NPDES permit is (✓ check one):

Still accurate | No longer describes conditions at site

If the application no longer describes conditions at the site, please (✓ check one):

Project has been completed/terminated | Project is ongoing and amended application or NOI will be submitted

Application forms can be downloaded at www.epa.gov/nea/npdes/epa_attach.html, or ✓ check here if you would like EPA to send you paper forms

Signature: [Signature] Date: 12/17/004

Title: Senior Project Manager - Groundwater + Environmental Services (GES)

Please return this suggested form or other correspondence with the requested information within **30 days** of receipt of the enclosed notification letter from EPA. Forms should be faxed to Steve Rapp at: 617-918-0551, or mailed to:

U.S. Environmental Protection Agency, Region I
NPDES Permit Unit (CPE)
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023



October 5, 2005

United States Environmental Protection Agency - Region 1
RGP- NOC Processing
Municipal Assistance Unit (CMU)
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: Certification of Facility covered under a NPDES Permit Exclusion with an Individual NPDES Permit at EPA (Reference ##01-013 - River System)

Mobil Service Station #12689 (Formerly 01-PLH)-River System
Old Cedar Street & 66 Dilla Street
Milford, Massachusetts
EPA NPDES Exclusion Reference #00-013
MADEP Release Tracking Number 2-13321
MADEP Site No. 2-0682

To Whom It May Concern,

On behalf of Mobil Business Resources Corporation (Mobil), a subsidiary of Exxon Mobil Corporation (ExxonMobil), Groundwater & Environmental Services, Inc. (GES) is submitting the required Certification Letter to indicate that ExxonMobil agrees to transfer the existing above-referenced National Pollutant Discharge Elimination System (NPDES) Permit Exclusion to the new Remediation General Permit (RGP), which went into effect September 2005. The permit is associated with the groundwater pump and treat remedial system (River System) located at the above-referenced address.

The subject site's NPDES Permit Exclusion (Reference #00-013) was issued by the Environmental Protection Agency (EPA) on November 24, 2000. Subsequently a formal NPDES Permit Application for an Individual Permit was submitted to EPA on March 21, 2001. The River System has been operating since November 6, 2000 and was temporarily deactivated as part of cycling operation in May 2005 and is expected to be re-activated in October 2005.

In response to the November 3, 2004 EPA "Jason" letter associated with the proposed RGP, in December 2004 GES submitted to EPA the required preliminary Certification Form, stating that GES and ExxonMobil selected the proposed RGP coverage. A copy of the December 2004 Certification Form is attached to this letter.

According to the Part I- Section B of the RGP, since only minor changes (presented further below) have been made to the discharge operations associated with the River



System since the submission of the Individual Permit Application, this certification letter is serving in lieu of a Notice of Intent (NOI). Following are the minor changes to the treatment associated with the River System, which occurred since 2001:

- Decrease in flow volume and petroleum impact concentrations, as indicated in monthly Discharge Monitoring Reports (DMR) submitted to EPA;
- As mentioned in the recent May and June 2005 DMRs, the treatment associated with the River System was modified by using two 200-pound liquid granular activated carbon (LGAC) units instead of three LGAC 200-pound units due to the decrease of influent concentrations;
- The Facility/Site Owner address and telephone number have been changed to:
David Baker
Exxon Mobil Corporation – 52 Beacham Street, Everett, MA 02149
Tel: 617-381-2807

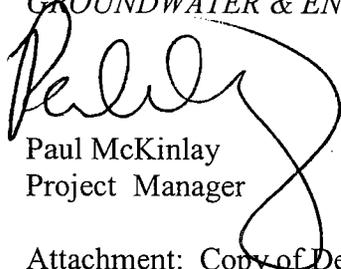
Based on the historical and current site data presented in the 2001 Individual Permit Application and in subsequent DMRs, GES and ExxonMobil believe that the discharge associated with the River System fall under RGP Sub-Category I-A (Petroleum related Site Remediation - Gasoline Only sites)

In accordance to the applicable new RGP requirements, GES will continue to operate, monitor and submit monthly reports under the requirements of the existing NPDES Exclusion permit until a RGP is received from your office and/or goes into effect. Once received, GES is expecting to continue to operate the River System under the applicable RGP requirements for RGP Sub-Category I-A.

If you have any questions about the enclosed Certification Letter, please feel free to contact the undersigned at (978) 392-0090.

Sincerely,

GROUNDWATER & ENVIRONMENTAL SERVICES, INC.



Paul McKinlay
Project Manager



Christophe M. Henry, PE, LSP
Senior Project Engineer

Attachment: Copy of December 2004 Certification Form

C: Mr. Michael O'Brien- EPA- NPDES Exclusion Program
Mobil File

Certification of Facilities Currently Covered by NPDES "Exclusion Letters" Which Have Submitted NPDES Applications to EPA NE



I, Christophe M. Henry, representing Mobil Business Resources Corp., request
(name of certifying official) (name of company owner of site)
Mobil Station No. 12689 (River System)
that the Milford, MA for which an NPDES application was submitted
(name of site or facility)

on 03/21/01 be covered by (✓ check one):
(date mm/dd/yy)

Permit Exclusion Reference # 01-013
Dated 10/24/00

Remediation General Permit (RGP)

An individual NPDES permit

Additionally, I certify that the information contained in the previously submitted application for an individual NPDES permit is (✓ check one):

Still accurate

No longer describes conditions at site

If the application no longer describes conditions at the site, please (✓ check one):

Project has been completed/terminated

Project is ongoing and amended application or NOI will be submitted

Application forms can be downloaded at www.epa.gov/ne/npdes/epa_attach.html, or ✓ check here if you would like EPA to send you paper forms

Signature: [Signature] Date: 12/17/2009

Title: Senior Project Manager - Groundwater & Environmental Services (GES)

Please return this suggested form or other correspondence with the requested information within 30 days of receipt of the enclosed notification letter from EPA. Forms should be faxed to Steve Rapp at: 617-918-0551, or mailed to:

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NPDES Permit Unit (CPE)
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023