



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 19, 2006

Paul Reiter, Environmental Engineer
Environmental Reclamation, LLC
137 Newbury Street, 7th Floor
Boston, MA 02116

Re: Authorization to Discharge Under the Remediation General Permit (RGP) to the Avon Quality Storage site in Avon, MA; Authorization #MAG910078 and MAG910079

Dear Mr. Reiter,

The US Environmental Protection Agency (EPA) is notifying you that on September 9, 2005, EPA published a notice in the Federal Register (see enclosed) announcing the availability of the Remediation General Permit (RGP). You are receiving this letter because you own or operate a site or facility in Massachusetts (MA) and you are currently authorized to discharge under an exclusion letter. An individual NPDES permit application was submitted for these discharges on July 18, 1997 and was deemed complete. There are two remediation systems currently operating at this site.

Effective 30 days after receipt of this letter and authorization, this letter and authorization closes out your exclusion letter and NPDES permit application. Based on the information contained in our files, EPA is authorizing you to discharge under the provisions of the Remediation General Permit (RGP) at this site, effective 30 days after receipt of this letter. Your authorization numbers are listed above. The RGP, Fact Sheet, response to public comments, suggested forms, and additional information can be found at: <http://www.epa.gov/region1/npdes/mass.html#dgp> or at: EPA-New England, One Congress Street, Suite 1100 (CIP), Boston, MA 02114.

The enclosed checklists designate the monitoring parameters applicable to your discharges. However, note that the checklists do not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the general permit, including influent and effluent monitoring, narrative water quality standards, sampling, record keeping, and reporting requirements, found in Part I, Part II, and Appendices I – VIII, of the RGP. This general permit and authorization to discharge expire on September 9, 2010.

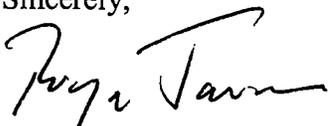
If you believe that the discharges at your site or facility should not be covered by the RGP or this authorization you must submit to EPA (at the address above), within 15 days, one of the following:

- (1) a Notice of Termination or other correspondence indicating that you are no longer discharging;
- (2) a Notice of Intent or other correspondence indicating current conditions and discharge characteristics.

Notice of this authorization, effective in 30 days, will be posted on EPA's website at: <http://www.epa.gov/region1/npdes/rgp.html>. This general permit authorization will expire on September 9, 2010.

Thank you in advance for your cooperation in this matter. Please contact George Papadopoulos at (617) 918-1579, or Papadopoulos.George@epa.gov, if you have any questions.

Sincerely,



Roger Janson, Chief
Municipal Permits Branch

Enclosures

cc: Paul Hogan, MassDEP

Summary of applicable monitoring parameters¹ under the Remediation General Permit (RGP)

Facility/Site Name: Avon Quality Storage

Facility/Site Address: 100 Ladge Drive
Avon, MA

Permit # MAG910078 Hybripak System 5/19/06

Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)	Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)
	1. Total Suspended Solids (TSS)	✓	27. Trichloroethylene (TCE)
	2. Total Residual Chlorine (TRC)		28. Vinyl Chloride (Chloroethene)
	3. Total Petroleum Hydrocarbons (TPH)		29. Acetone
	4. Cyanide (CN) ²		30. 1,4 Dioxane
	5. Benzene (B)		31. Total Phenols
	6. Toluene (T)		32. Pentachlorophenol (PCP)
	7. Ethylbenzene (E)		33. Total Phthalates
	8. (m,p,o) Xylenes (X)		34. Bis (2-Ethylhexyl) Phthalate
	9. Total BTEX ³		35. Total Group I Polycyclic Aromatic Hydrocarbons
	10. Ethylene Dibromide (EDB)		a. Benzo(a) Anthracene
✓	11. Methyl-tert-Butyl Ether (MtBE)		b. Benzo(a) Pyrene
	12. tert-Butyl Alcohol (TBA)		c. Benzo(b)Fluoranthene
	13. tert-Amyl Methyl Ether (TAME)		d. Benzo(k)Fluoranthene
	14. Naphthalene		e. Chrysene
	15. Carbon Tetrachloride		f. Dibenzo(a,h)anthracene
	16. 1,4 Dichlorobenzene (p-DCB)		g. Indeno(1,2,3-cd) Pyrene
	17. 1,2 Dichlorobenzene (o-DCB)		36. Total Group II Polycyclic Aromatic Hydrocarbons
	18. 1,3 Dichlorobenzene (m-DCB)		h. Acenaphthene
	18.a. Total dichlorobenzene		i. Acenaphthylene
	19. 1,1 Dichloroethane (DCA)		j. Anthracene
	20. 1,2 Dichloroethane (DCA)		k. Benzo(ghi) Perylene
	21. 1,1 Dichloroethylene (DCE)		l. Fluoranthene
✓	22. cis-1,2 Dichloro-ethylene (DCE)		m. Fluorene
	23. Dichloromethane (Methylene Chloride)		n. Naphthalene
✓	24. Tetrachloroethylene (PCE)		o. Phenanthrene
✓	25. 1,1,1 Trichloro-ethane (TCA)		p. Pyrene
	26. 1,1,2 Trichloro-ethane (TCA)		37. Total Polychlorinated Biphenyls (PCBs) ⁴

Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)	Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)
	38. Antimony	✓	52. Total Flow
	39. Arsenic	✓	53. pH Range for Class A & Class B Waters in MA
	40. Cadmium		54. pH Range for Class SA & Class SB Waters in MA
	41. Chromium III (trivalent)		55. pH Range for Class B Waters in NH
	42. Chromium VI (hexavalent)		56. Daily maximum temperature - Warm water fisheries
	43. Copper		57. Daily maximum temperature - Cold water fisheries
	44. Lead		58. Maximum Change in Temperature in MA - Any Class A water body
	45. Mercury		59. Maximum Change in Temperature in MA - Warm Water
✓	46. Nickel		60. Maximum Change in Temperature in MA - Cold Water and Lakes/Ponds
	47. Selenium		61. Maximum Change in Temperature in MA -Coastal
	48. Silver		62. Maximum Change in Temperature in MA - July to September
	49. Zinc		63. Maximum Change in Temperature in MA - October to June
	50. Iron	✓	<i>Other parameters: Chloroform</i>
✓	51. Instantaneous Flow		

Footnotes:

1. This checklist does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the remediation general permit (RGP), including influent monitoring, narrative water quality standards, etc. Operators must follow the RGP, including Parts I, II, and Appendices I - VIII in order to comply with the specific applicable requirements.
2. Limits for cyanide are based on EPA's water quality criteria expressed as micrograms (ug) of free cyanide per liter. There is currently no EPA approved test method for free cyanide. Therefore, total cyanide must be reported.
3. BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.
4. In the November 2002 WQC, EPA has revised the definition of Total PCBs for aquatic life as "total PCBs is the sum of all homologue, all isomer, all congener, or all Aroclor analyses."

Summary of applicable monitoring parameters¹ under the Remediation General Permit (RGP)

Facility/Site Name: Avon Quality Storage

Facility/Site Address: 100 Ladge Drive

Avon, MA

Permit # MAG910079

Trout Brook System

5/19/06

Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)	Monitor checked parameters	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)
	1. Total Suspended Solids (TSS)	✓	27. Trichloroethylene (TCE)
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	3. Total Petroleum Hydrocarbons (TPH)		29. Acetone
	4. Cyanide (CN) ²		30. 1,4 Dioxane
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	8. (m,p,o) Xylenes (X)		34. Bis (2-Ethylhexyl) Phthalate
	9. Total BTEX ³		35. Total Group I Polycyclic Aromatic Hydrocarbons
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	12. tert-Butyl Alcohol (TBA)		c. Benzo(b)Fluoranthene
	13. tert-Amyl Methyl Ether (TAME)		d. Benzo(k)Fluoranthene
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	42. Chromium VI (hexavalent)		56. Daily maximum temperature - Warm water fisheries
	43. Copper		57. Daily maximum temperature - Cold water fisheries
	44. Lead		58. Maximum Change in Temperature in MA - Any Class A water body
	45. Mercury		59. Maximum Change in Temperature in MA - Warm Water
	46. Nickel		60. Maximum Change in Temperature in MA - Cold Water and Lakes/Ponds
	47. Selenium		61. Maximum Change in Temperature in MA -Coastal
	48. Silver		62. Maximum Change in Temperature in MA - July to September
	49. Zinc		63. Maximum Change in Temperature in MA - October to June
	50. Iron	✓	<i>Other parameters: Chloroform</i>
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