



MAG 910295

TRC Reference Number E9202-9404-09400

VIA FEDERAL EXPRESS

October 5, 2005

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

Subject: Notice of Intent for Remediation General Permit MAG910000

Reference Site: Former General Electric Site  
50 Fordham Road  
Wilmington, MA

Dear Sir or Madam:

We are in receipt of the letter from David Webster, Industrial Permits Branch, dated September 15, 2005 regarding the Notice of Availability of the Remediation General Permit (RGP). This letter is written to inform you that we are filing our Notice of Intent for the RGP at the above-referenced site.

A NPDES application was filed for this site on June 4, 2003 and NPDES Exclusion #MA 03I-072 was received on June 12, 2003.

Since the receipt of the NPDES Exclusion, there have been no substantial changes to the discharge operations, and the original information contained in the NPDES application is correct and valid. Therefore, in accordance with Part I Section B(4)(b)(1) of Massachusetts General Permit No. MAG910000, you are hereby notified that this letter is serving in lieu of a Notice of Intent form submission.

The remedial discharge at this site is part of response actions conducted under the Massachusetts Contingency Plan (MCP), and therefore there are no requirements to file for separate Massachusetts state discharge permits.

Attached with this letter are copies of the original NPDES application and the NPDES Exclusion letter for your records.

If you have any questions, please contact Dr. Macchiaroli at (617) 350-9997.

Sincerely,

Paola E. Macchiaroli, Ph.D.  
Senior Project Manager

Bruce A. Hoskins, P.E., LSP  
LSP of Record

Attachments

CC: Jennifer Eck McWeeney, MADEP  
Kelley Beach, LMC  
PIP Repository  
Al Shafner, Ametek



COPY

June 4, 2003

Ms. Olga Vergara  
US Environmental Protection Agency  
NPDES Program (CPU)  
One Congress Street, Suite 1100  
Boston, MA 02114-2023

RE: NPDES Application for Remedial Groundwater Discharge  
Former GE Facility  
50 Fordham Road  
Wilmington, MA

Dear Ms. Vergara:

In accordance with previous instructions from yourself and Mr. John Hackler from your office, please find enclosed an application for NPDES discharge of remediated groundwater from the above-mentioned site. We have enclosed the following:

- A completed NPDES Permit Exclusion Application
- Summary of analytical data table
- Figure 1 – general site location
- Figure 2 – a site plan detailing the site, remediation system, and receiving waters

We understand that a NPDES Permit Exclusion will be granted until such time as the new EPA general remedial discharge permit becomes available, at which time we will apply for such a permit. This groundwater remediation is part of a Massachusetts Contingency Plan (MCP) response action at this site. In general, the remediation system consists of the extraction of groundwater at a rate of 3-5 gallons per minute from a single well. Chlorinated volatile organic compounds are the contaminants of concern. Treatment will consist of air stripping followed by activated carbon. The treated water will be sampled to verify extent of treatment prior to discharge to an existing storm sewer line that will ultimately discharge to an adjacent wetland. The treatment system is planned to go on-line in late June-early July, 2003.

This site is currently occupied by AMETEK Aerospace, Inc. (AMETEK). AMETEK has its own NPDES general permit for discharge of non-contact cooling water for the facility. The storm line that we intend to use as our treatment discharge point is also used by AMETEK for discharge of their non-contact cooling water (as well as parking lot runoff). As part of the permit requirements, AMETEK conducts temperature monitoring at the catch basin immediately outside of their facility building.

This is the same catch basin that will receive TRC's discharge via a pre-existing (and separate) storm drain discharge line that accepts roof drainage.

Ms Olga Vergara  
U.S. EPA  
June 4, 2003  
Page 2 of 2

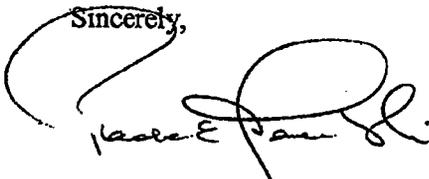
Per a recent phone conversation with Mr. Hackler of your office, commingling of the discharges from AMETEK and TRC is acceptable provided that AMETEK and TRC sample for their respective NDPES permit limits prior to mixing within the catch basin. For AMETEK, temperature monitoring can be conducted right at the pipe outlet to the catch basin, before mixing with the water that collects in the basin. TRC intends to conduct all sampling immediately after the activated carbon units (before entering the discharge line), far upstream of the catch basin.

TRC is kindly requesting that the above be verified. In addition, the AMETEK plant manager, Mr. Al Shafner, has requested that he be given a copy of our discharge application approval letter, with specific details that EPA accepts the planned commingling of discharges. Please send a copy of the approval letter to:

Mr. Al Shafner  
AMETEK Aerospace  
50 Fordham Road  
Wilmington, MA 01887

If you have any questions related to this application, please contact Paola at 617-350-9997.

Sincerely,



Paola E. Macchiareoli, Ph.D.  
Senior Project Manager



Bruce A. Hoskins, P.E  
Licensed Site Professional of Record

Enclosure

CC: Alan Shafner- AMETEK

**TRC**

Customer-Focused Solutions

**NPDES PERMIT EXCLUSION APPLICATION - INCIDENT NOTIFICATION REPORT**

U.S. EPA - Region I, One Congress Street, Suite 1100 (HBR), BOSTON, MA 02114

FORM USE ONLY

NPDES Exclusion Ref.#

Received: / / Military Time: GRANTED BY:

<b>A) REPORTER INFO.</b>	Requested by: Paola Macchiaroli		
	Organization Name TRC Environmental Corporation		
	Address: Boott Mills South, Foot of John Street		
	City Lowell	County Middlesex	State: MA
	Zip: 01852	Phone No. (978) 970-5600	

<b>B) DIS. CHARGER/ PERMITTEE/ OWNER</b>	Same As Above in A <input checked="" type="checkbox"/> Name/Company Name		
	Address:		Contact:
	City:	County:	State:
	Zip:	Phone No. ( )	

<b>C) DISCHARGE INCIDENT LOCATION</b>	Same As Above in B	Site Location Name: Former General Electric Site	
	Address: 50 Fordham Road		
	City: Wilmington	County: Middlesex	State: MA
	Zip: 01877	Phone No. (978) 988-4101	

<b>D) DATES</b>	Discharge Start Date: June 2003	Discharge Duration: 10 years (estimated)
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<b>E) GROUND WATER CONT.</b>	Contaminant 1	Contaminant 2	Contaminant 3	
	Trichloroethene	Tetrachloroethene	1,1-Dichloroethane	
	Approx. Concentration	6,000 ug/l	4,400 ug/l	120 ug/l
	Contaminant 4	Contaminant 5	Contaminant 6	
	cis-1,2-Dichloroethene	Toluene		
Approx. Concentration	120 ug/l	66 ug/l		

<b>F) TREATMENT SYSTEM</b>	Treatment Equipment: (check applicable)	Fluid Tank <input type="checkbox"/> Air Striper <input checked="" type="checkbox"/> GAC Filter <input checked="" type="checkbox"/> Bag Filter <input checked="" type="checkbox"/> Equalization Tanks <input type="checkbox"/> Other => Describe:	Oil/Water Separator <input type="checkbox"/> Other => Describe:
	Written Description of System: Groundwater will pass through a low-profile shallow-tray air stripper to remove the bulk of VOCs. Groundwater will then be pumped through a bag filter for particulate removal. Groundwater will then go through two GAC absorbers in series for final VOC polishing. Water will be discharged into a storm drain after GAC units. Separate GAC units will treat air emissions.		

<b>G) RECEIVING WATERS</b>	Discharge VIA: (check applicable)	Direct <input type="checkbox"/> Storm Drain <input checked="" type="checkbox"/> Wetlands <input type="checkbox"/> Within Facility <input type="checkbox"/> Other => Describe:	Unnamed River/Brook <input type="checkbox"/> Overland Unknown <input type="checkbox"/>
	Receiving Waterway Name: unnamed wetland that ultimately discharges to Ipswich River		

<b>H) PURPOSE OF DISCHARGE</b>	Dewatering Activity: (check applicable)	USL Replacement/Removal <input type="checkbox"/> Contaminated Excavation <input type="checkbox"/> Recovery & Treatment <input checked="" type="checkbox"/> Other => Describe:	Pump Test <input type="checkbox"/>
	Description: Discharges treated groundwater recovered from a portion of Massachusetts drinking water aquifer contaminated by the site. This site is an MCP site.		

<b>I) FLOW</b>	Maximum Flow Rate: 5 GPM
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<b>J) INFO</b>	Site ID #: MADEP RTN 3-0518	
	Agency Name: Massachusetts Dept of Env Protection	Contact: Jennifer Eck
	Agency Name:	Contact:

Summary of Historical Analytical Data for Groundwater Extraction Well TRC-202R

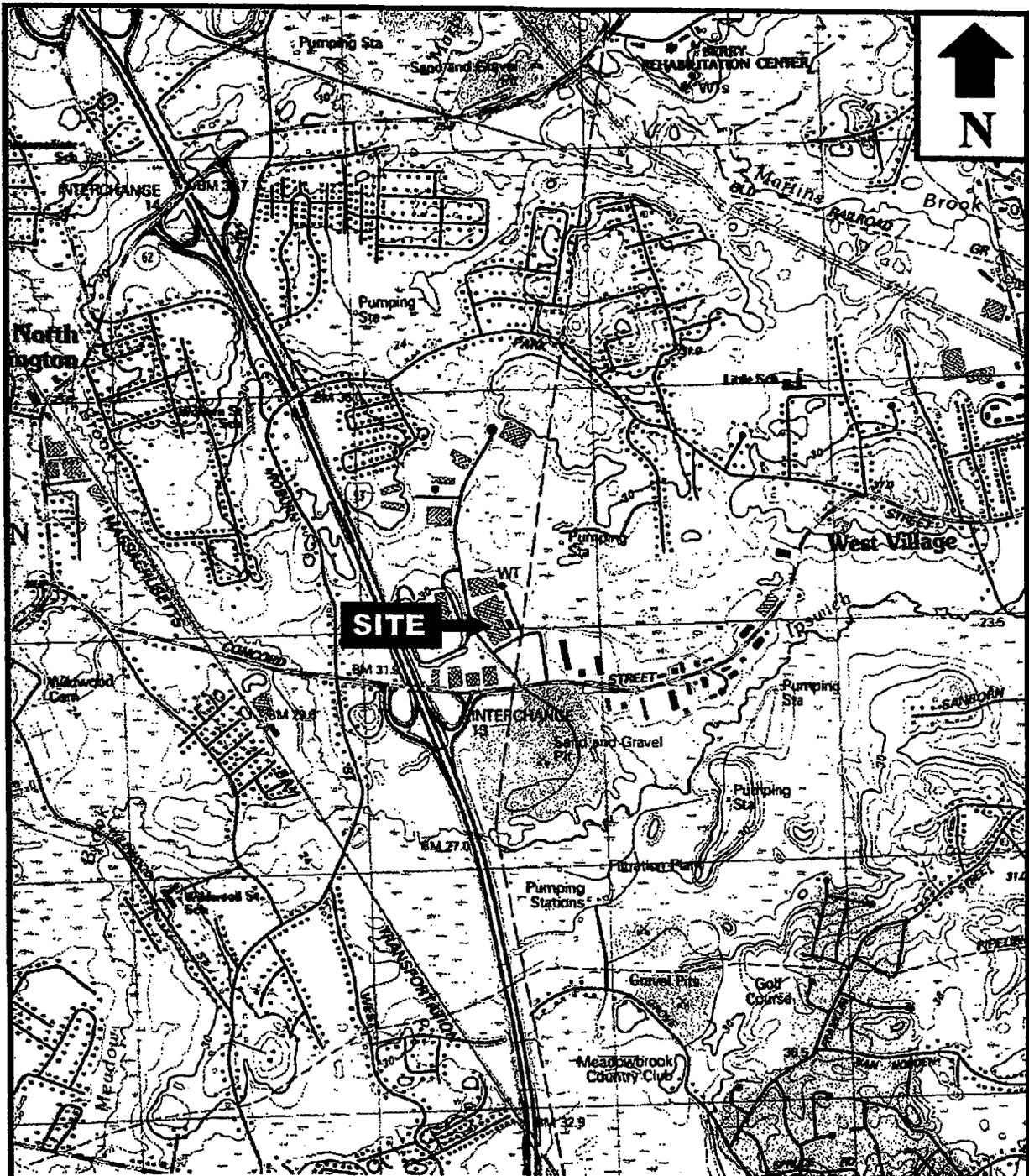
Volatile Organic Compounds Screen Depth Interval	TRC-202R					MCP GW-1 Standards
	Date	4/13/01	4/17/01	4/18/01	6/14/01	
1,1,1-Trichloroethane	<50	<20	<50	<50	<50	200
1,1-Dichloroethane	86	37	72	100	120	70
1,1-Dichloroethene	8.4	<20	7.5	<50	<50	7
1,2-Dichloroethane	<50	<20	<50	<50	<50	5
Chlorobenzene	<50	<20	<50	<50	<50	100
Chloroform	<50	<20	<50	<50	<50	5
cis-1,2-Dichloroethene	98	43	85	80	120	70
Ethylbenzene	<50	<20	<50	<50	<50	700
m- & p- Xylenes	<2	<40	<2	<100	<100	6,000
Methyl tert-butyl ether	<50	<20	<50	<50	<50	70
o-Xylene	<50	<20	<50	<50	<50	6,000
Tetrachloroethene	2900	1200	2000	3100	4400	5
Toluene	2.9	<20	5.6	71	66	1,000
trans-1,2-Dichloroethene	3.7	<20	3.3	<50	<50	100
Trichloroethene	4200	1900	3500	4800	6000	5
Vinyl chloride	<50	<20	<50	<50	<50	2
<b>TOTAL VOCs</b>	<b>7299</b>	<b>3180</b>	<b>5673.4</b>	<b>8151</b>	<b>10706</b>	

Notes:

Results expressed in ug/L.

< indicates result is below detection limit.

NA Not Analyzed

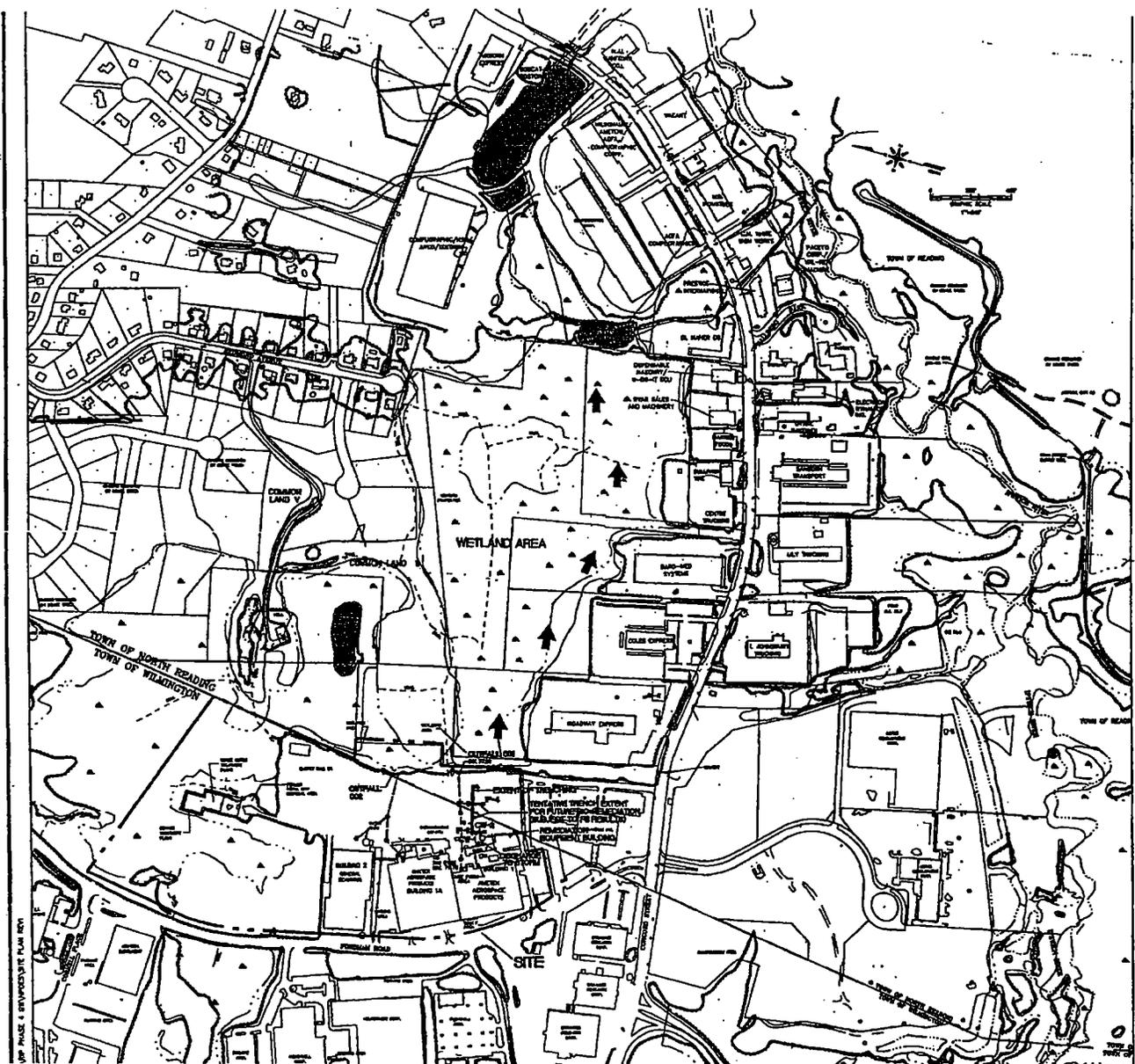


BASE MAP IS A PORTION OF THE FOLLOWING 7.5' x 15' USGS TOPOGRAPHIC QUADRANGLE: READING, MA 1987

E9202/01P PHASE 4 GW/TP/C



<b>TRC</b>	Boott Mills South Foot of John Street Lowell, MA 01852 (978) 970-5600
	FORMER GE SITE WILMINGTON/NORTH READING, MASSACHUSETTS
<b>FIGURE 1 SITE LOCATION MAP</b>	
Date: 5/03	Project No. E9202



- LEGEND**
- BENCHMARK
  - BENCHMARK SURFACE ELEVATION
  - BUILDING
  - APPROXIMATE PROPERTY LINE
  - APPROXIMATE TOWN LINE
  - APPROXIMATE EDGE OF WETLAND/STREAM
  - APPROXIMATE EDGE OF WETLAND/STREAM
  - FENCE LINE
  - CATCH BASIN
  - WATER SUPPLY WELL
  - ↑ FLOW DIRECTION THROUGH THE WETLAND
  - DRAIN LINE

- NOTES**
1. TOPOGRAPHIC AND PLANNING FEATURES SHOWN WERE COMPILED PHOTOGRAMMETRICALLY FROM AERIAL PHOTOGRAPHY DATED APRIL 24, 1978 BY EAST COAST MAPPING INC., CONCORD, NEW HAMPSHIRE. SHOWN GRADING CONTOURS ESTABLISHED BY FIELD SURVEYS CONDUCTED IN APRIL 1982.
  2. THE GRID SYSTEM DEPICTED ON THIS PLAN IS BASED ON THE MASSACHUSETTS STATE PLANNING ZONING AND DESIGN NORTH AMERICAN BURNING OF 1983.
  3. ELEVATIONS ARE BASED ON THE NATIONAL MEAN SEA LEVEL DATUM OF 1983.
  4. WETLANDS WELL LOCATIONS ARE APPROXIMATE.
  5. PROPERTY AND TOWN LINE BOUNDARIES WERE ADAPTED FROM "REGIONAL EXPLORATION PLAN, GENERAL ELECTRIC COMPANY, 80 FORDHAM ROAD PROPERTY, WILMINGTON/NORTH READING, MASS., BY GOLDING - BOND & ASSOCIATES, INC., DATED APRIL 1982.
  6. WELL LOCATIONS OF SEW AND STEERING SUPPLY ARE APPROXIMATE AND ARE FOR ILLUSTRATIVE PURPOSES ONLY.
  7. ROADWAY CROSSING WELL LOCATIONS ARE FROM FINAL PHASE 2 COMPACTION/SITE ASSESSMENT SUMMARY REPORT MAY 28, 1982.

<b>TRC Environmental Corporation</b>	800 North South East of John Street Lowell, MA 01852 (617) 878-2400
	FORMER GE SITE WILMINGTON/NORTH READING, MASSACHUSETTS
<b>FIGURE 2 SITE PLAN</b>	

VP: PHASE 1 & 2 ENVIRONMENTAL PLAN REV 1



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

COPY

June 12, 2003

Ms. Paola Macchiaroli, Ph.D.  
TRC Environmental Corp.  
Boott Mills South  
Foot of John Street  
Lowell, MA 01852

Re: Former General Electric Site, Wilmington, MA; NPDES Exclusion # MA 03I-072

Dear Ms. Macchiaroli:

As of June 3, 2002, the On-Scene Coordinators (OSC's) in the Emergency Planning & Response Branch of EPA-New England (EPA-NE) have no longer been issuing National Pollutant Discharge Elimination (NPDES) Permit "Exclusion" letters in the states of Massachusetts and New Hampshire. EPA is, however, still the permitting authority for point source water discharge permits in these two states. Since the early 90's, EPA-NE granted exclusions to the NPDES permit process under the authority of Section 122.3(d) of the NPDES regulations to allow expedited testing and cleanup of contaminated sites for which a discharge of groundwater and incidental surface water was required following appropriate treatment. This process was necessary due to the large number of cleanups requiring permits and the time-frame necessary to issue individual NPDES permits.

Exclusion letters were developed for each site following submission and review of an application with various site information, test data, treatment type, and other facts. Discharge effluent limits, monitoring requirements and other special conditions were set out in the letters signed by the OSC in charge. EPA-NE has determined that we can no longer issue these exclusions except in circumstances where a response action is under the direct control of the OSC (either EPA or the USCG) as outlined in the National Contingency Plan (NCP). These determinations are made following notification to the National Response Center of a release of a reportable quantity of oil or hazardous substances.

We are in the process of developing a new General NPDES Permit to cover short and long term discharges from remediation activities. We expect the lead time needed to become covered by the General Permit to be about the same as the current exclusion waiver process. We hope to have the General Permit published in the Federal Register as final and effective in the near future. Until the effective date of the new General Permit, EPA-NE is requesting that you provide treatment of any such discharges to waters of the United States consistent with the limits and other requirements traditionally established in the Exclusion letters process.

Please refer to "ATTACHMENT A" to this letter for the interim requirements for discharge.

Toll Free • 1-888-372-7341

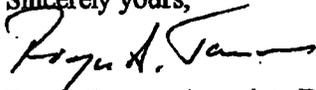
Internet Address (URL) • <http://www.epa.gov/region1>

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In your June 4, 2003 cover letter to EPA which included your application for the NPDES exclusion authorization, you explained that the discharge from the groundwater treatment facility at this site is co-mingled in a common catch basin with another NPDES permitted discharge from AMETEK Aerospace, Inc., the current occupant of the buildings at this location. This other discharge is a non-contact cooling water discharge covered under EPA's general permit. In the conference call you had with John Hackler of our NPDES Unit, it was explained that for NPDES compliance purposes, the discharge from AMETEK and from the groundwater remediation system can be separately monitored before co-mingling and ultimate discharge to wetlands and the Ipswich River. This is acceptable to EPA and a copy of this exclusion authorization is being forwarded to Mr. Shafner, plant manager at AMETEK, as you requested.

If you have any questions or concerns about this letter please contact John Hackler of the NPDES Program at (617) 918-1551.

Sincerely yours,



Roger Janson, Associate Director  
Surface Water Programs

cc. MADEP, BWSC  
A. Shafner, AMETEK  
O. Vergara, EPA

\*\*\*\* FORMER GENERAL ELECTRIC SITE, WILMINGTON, MA \*\*\*\*

ATTACHMENT A

The discharge(s) referenced in the accompanying letter must be in accordance with the following provisions:

1. No discharge of oil, sufficient to cause a sheen (as defined in 40 CFR 110), occurs to the drainage system. The discharge of a sheen of oil or gasoline constitutes an oil spill and must be reported immediately to the National Response Center (NRC) at (800) 424-8802.
2. Security provisions are maintained to assure that system failure, vandalism, or other incidents will be addressed in a timely fashion, preventing the loss of oil or contaminated water to the drainage system.
3. The flow rate shall be maintained within acceptable operating parameters and shall not exceed the design flow of the treatment system. There shall be no bypass of the treatment system unless unavoidable to prevent loss of life, personal injury, or severe property damage. No filter backwash or other maintenance waters shall be discharged without treatment.
4. Sampling and analysis, in accordance with EPA Methods, must be performed for the following chemicals with the listed limits being applicable:

CONVENTIONAL

Flow	Continuous/Totalizer
pH	6.5-8.3 S.U.
Total Suspended Solids (TSS)	30 ppm

ORGANICS

1,1-Dichloroethane (DCA)	70 ppb
cis-1,2-Dichloroethylene (DCE)	70 ppb
Tetrachloroethylene (PCE)	5 ppb
Trichloroethylene (TCE)	5 ppb

Should sampling indicate the presence of additional chemicals, discharge concentrations should not exceed the Federal Drinking Water Standards (MCL's) or 100 ppb, whichever is lower, in the effluent.

**Solids** - These waters shall be free from floating, suspended, and settleable solids in concentrations or combinations that would impair any use assigned to this class, that would cause esthetically objectionable conditions, or that would impair the benthic biota or degrade the chemical composition of the bottom sediments.

**Color and Turbidity** - These waters shall be free from color and turbidity in concentrations or combinations that are esthetically objectionable conditions or that would impair the use assigned to this class.

Laboratory samples must be obtained from the influent to treatment, and from the effluent to the drainage system once each day for the first, third and sixth day of discharge. These samples must be analyzed with a 72-hour turnaround time. If the system is working properly, sampling for the remainder of the month shall be weekly and then monthly thereafter. The turnaround time for these samples shall ensure that no more than seven days pass between the sampling event and when the results are received and reviewed by the contractor.

If analysis indicates that the effluent limits have been exceeded, then the system must be shut down immediately and the problem corrected. Upon restarting the system, a sample must be taken and there must be 24 hour turnaround for the results. If the analysis indicates that the problem has been corrected, then the sampling schedule shall resume. If not, then the system shall be shut down again and repaired.

5. Analytical Reports, with quality control information, are to be reported to EPA and the MADEP or NHDES Project Manager by the 28th of the following month. Reports to EPA should be sent to:

NPDES Permit Unit  
Mail Code (CPE)  
Office of Ecosystem Protection  
Environmental Protection Agency  
One Congress St., Suite 1100  
Boston, MA 02114-2023

RE: NPDES [please include assigned reference # on all correspondence]

6. You, or your contractor, must maintain copies of all analytical reports, and quality control information for a period of 3 years from the date of the report.

You should consider these requirements to be in effect immediately.