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15 August 2008  
File No. 05750-632

US Environmental Protection Agency  
RGP-NOC Processing  
Mail Code CMP  
1 Congress Street, Suite 1100  
Boston MA 02114-2023

Attention: Mr. Victor Alvarez

Subject: Notice of Intent (NOI)  
Construction Dewatering  
The Watch Factory  
Redevelopment Project  
183-242 Crescent Street  
Waltham, Massachusetts

Dear Mr. Alvarez:

In accordance with the National Pollutant Discharge Elimination System (NPDES) Remediation General Permit (RGP) in Massachusetts, MAG910000, this letter submits a Notice of Intent (NOI) and the applicable documentation as required by the US Environmental Protection Agency (EPA) for construction site dewatering under the RGP. Dewatering is planned in support of the construction activities proposed at The Watch Factory redevelopment project site, located at 183-242 Crescent Street, Waltham, Massachusetts, as shown on the Project Locus (Figure 1).

Waltham Watch Company and its corporate predecessors owned the property and conducted watch manufacturing activities at the site from 1854 to 1954. Based on review of historical Watch Company plans, Waltham Watch conducted watch manufacturing, assembly, and plating and gilding of watch parts in the factory on the 9-acre land portion of the property. Waltham Industrial Labs, a former tenant on the property which occupied Buildings 16, 17, 18 and 19, conducted electroplating operations in Building 16 from approximately 1959 to 30 March 1984, when it ceased operations. The First Republic Corporation of America (FRCA) purchased the property in 1961. The current property owner, Watch City Ventures LLC, acquired the property in May 2007.

The limits of work include a state disposal site with a Release Tracking Number (RTN) issued by the Massachusetts Department of Environmental Protection (MassDEP) and subject to the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. The former Waltham Industrial Labs Disposal Site (RTN 3-0585) was divided into three separate portions. A major part of the land portion of the disposal site achieved a Class A-3 RAO in June 2006. An implemented Activity and Use Limitation maintains a condition of No Significant Risk. The Charles River portion of the disposal site achieved a Class C-1 RAO on 12 May 2008. The Building 16 Remediation Area is currently in Remedy Operation Status (ROS) and the implemented remedy completed on 12 May 2008 is being monitored. Construction and dewatering

activities are planned in the AUL area, in the Building 16 Remediation Area currently in ROS, and outside the limits of the disposal site. Construction activities within the disposal site will be conducted in accordance with the AUL and a Release Abatement Measure Plan (RAM).

Site assessment and remedial activities conducted at the site since 1985 have documented the following historical releases on the property. For purposes of the RGP application and based on the locations where dewatering may be required during construction, three existing groundwater monitoring wells located near the following releases were sampled to obtain the data set for the RGP application:

#### **Building 27 and the Former Trichloroethylene Distillery**

A release of chlorinated solvents and petroleum from a former kerosene/ trichloroethylene (TCE) "Distillery" at Building 27 at the northern portion of the site was identified and assessed during Phase II (RTN 3-20575, linked with RTN 3-0585) (Figure 2). This historical operation is the likely source of TCE and petroleum in soils and groundwater located in the subsurface between Building 27 and the Charles River (Figure 2). The horizontal and vertical extent of TCE and related daughter products released from the Building 27 release has been delineated to the extent feasible. No light non-aqueous phase liquid (LNAPL) or dense non-aqueous phase liquid (DNAPL) has been identified in site groundwater monitoring wells that have been gauged during the history of the assessment activities. Soil and groundwater contamination (petroleum and chlorinated solvents) is expected in the immediate vicinity of Building 27 beneath the riverside access drive. At this time, construction dewatering is not anticipated directly adjacent to Building 27. Monitoring well HA-602A(MW) is located south of the Building 27 release and is adjacent to possible dewatering activities (Figure 2). This monitoring well was sampled for the RGP application parameters.

#### **Former Gasoline USTS**

A previously unidentified UST was encountered on 11 August 2000 during trench excavation activities (conducted for purposes of installing a natural gas utility service pipeline) along the property riverside access drive. Excavation to remove the UST encountered one 425-gallon gasoline UST and one 515-gallon gasoline UST, located near the boiler room for the facility. The USTs were removed on 18 August 2000. These USTs were located in the central portion of the site near the central plant and beneath the riverside access drive (Figure 2). A Class A-3 Partial RAO Statement dated 16 June 2006 includes the Former Gasoline UST area of the site. However, residual soil and groundwater contamination is expected in the immediate vicinity of the former gasoline USTs location. Monitoring well HA-602A(MW) is located north of this release and is adjacent to possible dewatering activities (Figure 2). This monitoring well was sampled for the RGP application parameters.

#### **Former Ethyl Acetate UST Location**

A 275-gallon UST identified on historical plans as an ethyl acetate tank was removed from the ground, immediately east of Building 27 on 25 May 2000. Approximately 4 cy of soil from the tank grave were excavated and disposed of as an MCP Limited Removal Action (LRA). Following completion of an Assessment-only Immediate Response Action, a Class A-2 Response Action Outcome Statement, dated 31 May 2001, was prepared and filed for soil at

the over-excavated former UST location. Residual contamination associated with the former ethyl acetate UST is not expected at this location. Dewatering will not likely encounter contamination attributable to the former ethyl acetate UST.

### **Buildings 17, 18, and 19**

From approximately 1959 through 30 March 1984, the former Waltham Industrial Labs occupied Buildings 16, 17, 18, and 19 in the historic Waltham Watch factory complex (Figure 2). Both the watch factory and the former Waltham Industrial Labs operation conducted electroplating historically in Buildings 18 and 19. Waltham Industrial Labs also conducted electroplating in Buildings 16 and 17. Plating wastes, degreasers, and petroleum products were generated, used, and stored on the property. During the period 1984 through 1988, FRCA conducted remedial actions at the former Waltham Industrial Labs, in accordance with DEQE requisite actions and concurrence. Electroplating sludge and contaminated soils were removed from crawlspaces beneath the floor in Buildings 18 and 19. There is potential to encounter residual contamination associated with former Waltham Industrial Labs operations at Buildings 17, 18 and 19. There is potential to encounter residual metals and volatile organic compounds associated with this release. Groundwater monitoring well HA-10(MW) is located near potential dewatering locations in the vicinity of the former releases at Waltham Industrial Labs (Buildings 17, 18, and 19). This monitoring well was sampled for the RGP application parameters.

### **Building 16 Remediation Area (Phase V/ROS)**

As part of MCP Phase IV activities, Building 16 was demolished in the fall of 2007. Contaminated building debris was removed and disposed off-site as hazardous waste. In addition to the building demolition, soils impacted by the historical release of plating solutions to an unlined trench and to the ground surface along the southern wall of former Building 16 were remediated. A total of approximately 563 tons (approximately 375 cy) of soil impacted by cadmium concentrations interpreted to be greater than or equal to 300 mg/kg were excavated during the Phase IV implementation. Soil with cadmium concentrations ranging from 30 mg/kg to 300 mg/kg was solidified in-situ, effectively reducing the potential for cadmium in soils to leach to groundwater. A total of approximately 2,160 cy of soil were treated by in situ solidification. Phase IV remedial activities were completed with off-site shipment of stockpiled soil for hazardous waste disposal at Stablex Canada, Inc. from 1 May through 6 May 2008.

Based on the results of the Phase IV, it is likely that residual contamination associated with former Waltham Industrial Labs operations at Building 16 could be encountered in soils and groundwater that may need to be excavated and/or managed west and south of the Phase IV solidification footprint. Groundwater monitoring well HA-8(MW) is located near potential dewatering locations in the vicinity of the former releases at Waltham Industrial Labs (former Building 16). This monitoring well was sampled for the RGP application parameters.

### **Planned Construction Activities**

Watch City Ventures LLC, plans to renovate the existing buildings within the historic Waltham Watch Factory complex and redevelop the site. Planned construction activities with the potential to require dewatering include several utility improvements that will be conducted as part of the site redevelopment. Utility work includes installation of storm water drainage lines, storm water collection systems, and related structures. Excavations for the utility improvement installations will extend below the range of normal groundwater levels measured at the site, and below the level of the abutting Charles River. Pumped groundwater is planned to be recharged to the subsurface in the vicinity of the excavation to the extent possible. However, in the event that discharge of treated dewatering effluent to surface water is required, dewatering activities will be managed in accordance with the NPDES RGP.

In support of the NOI, groundwater samples were collected from three observation wells (HA-8 (MW), HA-10 (MW), and HA-602A (MW)). These existing groundwater monitoring wells are located near the individual releases of VOCs, petroleum, and metals outlined above and are also located near possible dewatering locations. The results of water quality testing conducted for this NOI are summarized in Table I. The locations of the observation wells are shown on Figure 2.

Dewatering will be conducted from sumps located inside the shored and enclosed utility excavations. Dewatering is necessary to control groundwater, seepage, precipitation, surface water runoff and construction-generated water to enable construction in-the-dry. Long-term construction dewatering is not expected to be necessary, with intermittent dewatering anticipated for construction of certain utilities and structures (e.g.; stormwater catch basins). Construction dewatering is anticipated to begin in August 2008.

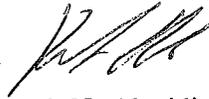
Prior to discharge, collected water will be routed through a sedimentation tank and bag filter, at a minimum, to remove suspended solids and undissolved chemical constituents (metals), as shown in the Proposed Treatment System Schematic included in Figure 3 herein. The effluent will be piped and directly discharged to storm drains located within the site. The storm drains travel a short distance within the site and discharge into the Charles River. The effluent may also be discharged directly to the Charles River, which immediately abuts the subject site. The proposed discharge route and proposed catch basin discharge points are shown on Figure 4, Proposed Dewatering Discharge.

The completed "Suggested Notice of Intent" (NOI) form as provided in the RGP is enclosed in Appendix A. The site owner is Watch City Ventures LLC, and the operator is Columbia Construction Company (Columbia). Columbia is the general contractor and will hire a subcontractor to conduct the Site Work, including the dewatering activities. On behalf of the owner, an environmental consultant will monitor the Contractor's dewatering activities. In accordance with the requirements for this NOI submission, the owner and Contractor are listed as co-permittees for this NPDES RGP and have both signed the NOI form.

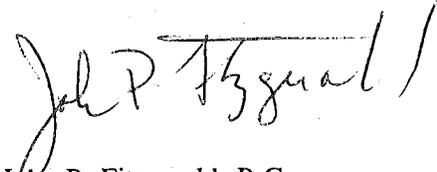
Appendix B provides Material Data Safety Sheets (MSDS) and fact sheets for possible chemical additives or treatments to be used in the treatment system. A Best Management Practices Plan (BMPP) has been completed and is included in Appendix C. The BMPP outlines the proposed discharge operations covered under the RGP. Appendix D and E include National Register of Historic Places and Endangered Species Act documentation. A copy of the laboratory results are provided in Appendix F.

Thank you very much for your prompt consideration of this NOI. Please feel free to contact us should you wish to discuss the information contained herein or if you need additional information.

Sincerely yours,  
HALEY & ALDRICH, INC.



Kenneth N. Alepidis  
Staff Environmental Geologist



John P. Fitzgerald, P.G.  
Senior Environmental Geologist



Paul P. Ozarowski, P.E., LSP  
Vice President

Attachments:

Table I - Summary of Groundwater Quality Data

Figure 1 - Site Locus

Figure 2 - Subsurface Exploration Location Plan and Limits of Disposal Site and Activity and Use Limitation

Figure 3 - Proposed Treatment System Schematic

Figure 4 - Proposed Dewatering Discharge

Appendix A - Notice of Intent (NOI) for Remediation General Permit (RGP)

Appendix B - MSDS and Fact Sheets

Appendix C - Best Management Practices Plan (BMPP)

Appendix D - National Register of Historic Places and Massachusetts Historical Commission documentation

Appendix E - Endangered Species Act documentation

Appendix F - Laboratory Data Reports

- c: The First Republic Corporation of America; Attn: John Martin  
Bingham McCutcheon LLP; Attn: William Squires, III  
Watch City Ventures LLC; Attn: Eric Ekman  
Columbia Construction Company; Ted Sirakian  
City of Waltham, Conservation Commission  
Massachusetts Department of Environmental Protection; Division of Watershed Management

**TABLE I**  
**SUMMARY OF GROUNDWATER QUALITY DATA**  
**NPDES RGP**  
**THE WATCH FACTORY**  
**WALTHAM, MASSACHUSETTS**  
**FILE NO. 05750-632**

SAMPLE DESIGNATION LABORATORY SAMPLE DESIGNATION	NPDES RGP	HA-8 (MW) L0807896-01	HA-10 (MW) L0807896-02	HA-602A (MW) L0807896-03
SAMPLING DATE	Effluent Limits	L0808071-02 5/29/2008 6/2/2008	L0808071-01 5/29/2008 6/2/2008	L0808071-03 5/29/2008 6/2/2008
<b>VOCs (mg/l)</b>				
1,1,1-Trichloroethane	0.2	ND(0.00025)	ND(0.00025)	0.0016
1,1,2-Trichloroethane	0.005	ND(0.000375)	ND(0.000375)	ND(0.00075)
1,1-Dichloroethane	0.07	ND(0.000375)	ND(0.000375)	0.01
1,1-Dichloroethene	0.0032	ND(0.00025)	ND(0.00025)	0.0018
1,2-Dichlorobenzene	0.6	ND(0.00125)	ND(0.00125)	ND(0.0025)
1,2-Dichloroethane	0.005	ND(0.00025)	ND(0.00025)	ND(0.0005)
1,3-Dichlorobenzene	0.32	ND(0.00125)	ND(0.00125)	ND(0.0025)
1,4-Dichlorobenzene	0.005	ND(0.00125)	ND(0.00125)	ND(0.0025)
Acetone	Monitor	ND(0.0025)	ND(0.0025)	ND(0.005)
Benzene	0.005	ND(0.00025)	ND(0.00025)	ND(0.0005)
Carbon tetrachloride	0.0044	ND(0.00025)	ND(0.00025)	ND(0.0005)
Ethylbenzene	+	ND(0.00025)	ND(0.00025)	ND(0.0005)
Methyl tert butyl ether	0.07	ND(0.0005)	ND(0.0005)	ND(0.001)
Methylene chloride	0.0046	ND(0.0025)	ND(0.0025)	ND(0.005)
Tetrachloroethene	0.005	ND(0.00025)	ND(0.00025)	ND(0.0005)
Toluene	+	ND(0.000375)	ND(0.000375)	ND(0.00075)
Trichloroethene	0.005	ND(0.00025)	0.0014	<b>0.54</b>
Vinyl chloride	0.002	ND(0.0005)	<b>0.022</b>	<b>0.042</b>
Xylene (Total)	+	ND	ND	ND
cis-1,2-Dichloroethene	0.07	ND(0.00025)	0.015	<b>0.075</b>
o-xylene	+	ND(0.0005)	ND(0.0005)	ND(0.001)
p/m-Xylene	+	ND(0.0005)	ND(0.0005)	ND(0.001)
trans-1,2-Dichloroethene	-	ND(0.000375)	ND(0.000375)	0.0036
Naphthalene	0.0200	ND(0.00125)	ND(0.00125)	ND(0.0025)
p-Isopropyltoluene	-	ND(0.00025)	0.0039	ND(0.0005)
<b>Total VOCs</b>		ND	0.0423	0.674
<b>SVOCs (mg/l)</b>				
Acenaphthene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Acenaphthylene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Anthracene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Benzo(a)anthracene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Benzo(a)pyrene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Benzo(b)fluoranthene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Benzo(ghi)perylene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Benzo(k)fluoranthene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Bis(2-ethylhexyl)phthalate	0.006	ND(0.0025)	ND(0.0025)	ND(0.0025)
Butyl benzyl phthalate	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Chrysene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Di-n-butylphthalate	-	ND(0.0025)	ND(0.0025)	ND(0.0025)
Di-n-octylphthalate	-	ND(0.0025)	ND(0.0025)	ND(0.0025)
Dibenzo(a,h)anthracene	*	ND(0.0025)	ND(0.0025)	ND(0.0025)
Diethyl phthalate	-	ND(0.0025)	ND(0.0025)	ND(0.0025)
Dimethyl phthalate	-	ND(0.0025)	ND(0.0025)	ND(0.0025)
Fluoranthene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Fluorene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Indeno(1,2,3-cd)pyrene	*	ND(0.0035)	ND(0.0035)	ND(0.0035)
Naphthalene	0.02	ND(0.0025)	ND(0.0025)	ND(0.0025)
Pentachlorophenol	0.001	ND(0.005)	ND(0.005)	ND(0.005)
Phenanthrene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
Phenol	0.3	ND(0.0035)	ND(0.0035)	ND(0.0035)
Pyrene	**	ND(0.0025)	ND(0.0025)	ND(0.0025)
<b>Total SVOCs</b>		ND	ND	ND

TABLE I  
SUMMARY OF GROUNDWATER QUALITY DATA  
NPDES RGP  
THE WATCH FACTORY  
WALTHAM, MASSACHUSETTS  
FILE NO. 05750-632

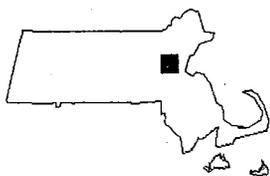
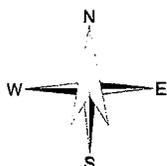
SAMPLE DESIGNATION LABORATORY SAMPLE DESIGNATION	NPDES RGP Effluent Limits	HA-8 (MW) L0807896-01 L0808071-02 5/29/2008 6/2/2008	HA-10 (MW) L0807896-02 L0808071-01 5/29/2008 6/2/2008	HA-602A (MW) L0807896-03 L0808071-03 5/29/2008 6/2/2008
<b>PAH by GC/MS SIM 8270M (mg/l)</b>				
1-Methylnaphthalene	-	ND(0.0001)	ND(0.0001)	ND(0.0001)
2-Chloronaphthalene	-	ND(0.0001)	ND(0.0001)	ND(0.0001)
2-Methylnaphthalene	-	ND(0.0001)	ND(0.0001)	ND(0.0001)
Acenaphthene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Acenaphthylene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Anthracene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Benzo(a)anthracene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Benzo(a)pyrene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Benzo(b)fluoranthene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Benzo(g,h,i)perylene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Benzo(k)fluoranthene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Chrysene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Dibenzo(a,h)anthracene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Fluoranthene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Fluorene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Indeno(1,2,3-cd)Pyrene	*	ND(0.0001)	ND(0.0001)	ND(0.0001)
Naphthalene	0.02	ND(0.0001)	ND(0.0001)	ND(0.0001)
Pentachlorophenol	0.001	ND(0.0004)	ND(0.0004)	ND(0.0004)
Phenanthrene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
Pyrene	**	ND(0.0001)	ND(0.0001)	ND(0.0001)
<b>Total PAH</b>	<b>0.1</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>Total Metals (mg/l)</b>				
Antimony	0.0056	ND(0.00025)	ND(0.00025)	ND(0.00025)
Arsenic	0.01	0.0017	<b>0.0396</b>	0.0016
Cadmium	0.0002	<b>0.0004</b>	ND(0.0001)	ND(0.0001)
Chromium	0.0488	0.0009	0.0013	0.0006
Copper	0.0052	0.0022	<b>0.0536</b>	<b>0.0106</b>
Iron	1	<b>20</b>	<b>11</b>	<b>8.8</b>
Lead	0.0013	<b>0.0014</b>	<b>0.0937</b>	<b>0.0021</b>
Mercury	0.0009	ND(0.0001)	<b>0.0075</b>	ND(0.0001)
Nickel	0.029	0.0048	0.0091	0.0016
Selenium	0.005	0.002	0.001	0.001
Silver	0.0012	ND(0.0002)	<b>0.0024</b>	ND(0.0002)
Zinc	0.0666	0.0111	<b>0.8816</b>	0.0251
<b>Pesticides by GC 504 (mg/l)</b>				
1,2-Dibromoethane	0.00005	ND(0.0000095)	ND(0.0000097)	ND(9.75E-06)
1,2-Dibromo-3-chloropropane	-	ND(0.0000095)	ND(0.0000097)	ND(9.75E-06)
<b>PCBs (mg/l)</b>				
Aroclor 1221	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1232	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1242/1016	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1016	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1248	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1254	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
Aroclor 1260	*	ND(0.000125)	ND(0.000125)	ND(0.000125)
<b>Total PCBs</b>	*	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>Other</b>				
Solids, Total Suspended (mg/l)	30	16	<b>76</b>	15
Cyanide, Total (mg/l)	0.0052	ND(0.0025)	<b>0.007</b>	ND(0.0025)
Chlorine, Total Residual (mg/l)	0.011	ND(0.01)	ND(0.01)	ND(0.01)
TPH (mg/l)	5	ND(2)	ND(2)	ND(2)
Chromium, Hexavalent (mg/l)	0.0114	ND(0.005)	ND(0.025)	ND(0.005)
Phenolics, Total	0.3	ND(0.015)	ND(0.015)	ND(0.015)
<b>NOTES AND ABBREVIATIONS</b>				
1. A ND means not detected. Number in parentheses is one-half the laboratory detection limit				
2 A - indicates none listed				
3. A * indicates the compliance limits are equal to the minimum level of the test method used.				
4. Bold indicates exceedence of NPDES RGP effluent limits.				
5. A ** indicated limited as total PAHS (0.1 mg/l)				
6. A + indicates limited as total BTEX (0.1 mg/l)				
7. This summary table includes detected and common parameters. The complete list of analyzed parameters is included with the laboratory reports in Appendix F.				



SITE COORDINATES: 42°21'60"N 71°14'38"W

**HALEY & ALDRICH**

THE WATCH FACTORY REDEVELOPMENT PROJECT  
 NPDES REMEDIATION GENERAL PERMIT  
 183-242 CRESCENT STREET  
 WALTHAM, MASSACHUSETTS

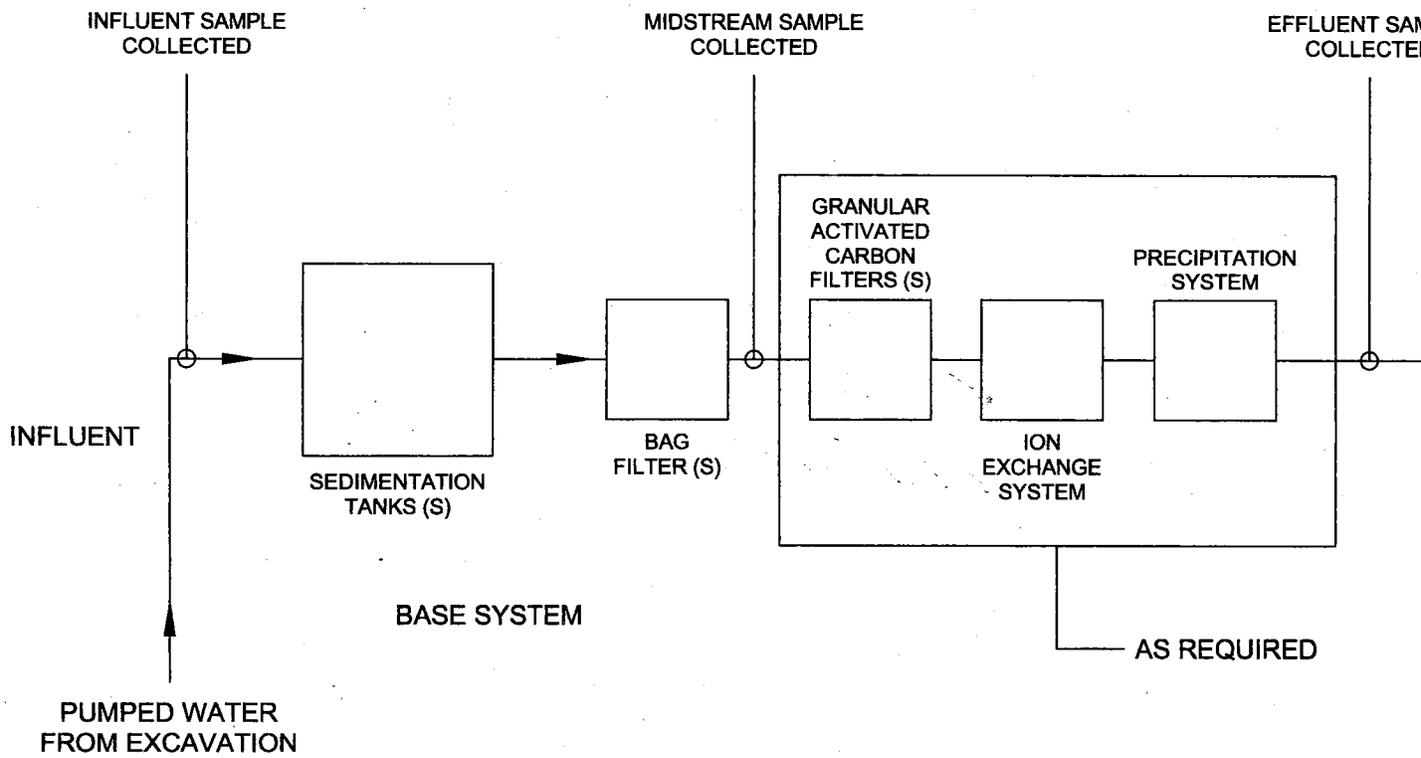


U.S.G.S. QUADRANGLE: NEWTON, MA

PROJECT LOCUS

SCALE: 1:24,000  
 AUGUST 2008

FIGURE 1



**LEGEND:**

→ DIRECTION OF FLOW

**NOTE:**

1. DETAILS OF TREATMENT SYSTEM MAY VARY FROM SYSTEM INDICATED ABOVE. SPECIFIC MEANS AND METHODS OF TREATMENT TO BE SELECTED BY CONTRACTOR. WATER WILL BE TREATED TO MEET REQUIRED EFFLUENT STANDARDS.

**HALEY & ALDRICH** THE WALTHAM WA  
NPDES RGP  
WALTHAM, MASSACHUSETTS

**PROPOSED  
SCHEMATIC**

SCALE: NONE  
AUGUST 2008

**APPENDIX A**

**Notice of Intent (NOI) for Remediation General Permit (RGP)**

**B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit**

1. **General site information.** Please provide the following information about the site:

a) Name of facility/site: <b>The Watch Factory Redevelopment Project</b>		Facility/site address:	
Location of facility/site: longitude: <u>71 14 39.40</u> latitude: <u>42 22 0.31</u>	Facility SIC code(s):	Street: <b>183-242 Crescent Street</b>	
b) Name of facility/site owner: <b>Watch City Ventures LLC</b>		Town: <b>Waltham</b>	
Email address of owner: <b>eekman@berkinv.com</b>		State:	Zip:
Telephone no. of facility/site owner: <b>617-439-0088</b>		<b>MA</b>	<b>02451</b>
Fax no. of facility/site owner: <b>617-439-4449</b>		County: <b>Middlesex</b>	
Address of owner (if different from site):		Owner is (check one): 1. Federal ___ 2. State/Tribal ___	
Street: <b>121 High Street</b>		3. Private <input checked="" type="checkbox"/> 4. other, if so, describe:	
Town: <b>Boston</b>	State: <b>MA</b>	Zip: <b>02110</b>	County: <b>Suffolk</b>
c) Legal name of operator: <b>Columbia Construction Company</b>		Operator telephone no: <b>978-664-9500</b>	
		Operator fax no.: <b>978-664-8548</b>	Operator email: <b>tsirakian@columbiacc.com</b>
Operator contact name and title: <b>Ted Sirakian</b>			
Address of operator (if different from owner):		Street: <b>100 Riverpark Drive PO Box 220</b>	
Town: <b>North Reading</b>	State: <b>MA</b>	Zip: <b>01864</b>	County: <b>Middlesex</b>
d) Check "yes" or "no" for the following:			
1. Has a prior NPDES permit exclusion been granted for the discharge? Yes ___ No <input checked="" type="checkbox"/> , if "yes," number:			
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Yes ___ No <input checked="" type="checkbox"/> , if "yes," date and tracking #:			
3. Is the discharge a "new discharge" as defined by 40 CFR 122.2? Yes <input checked="" type="checkbox"/> No ___			
4. For sites in Massachusetts, is the discharge covered under the MA Contingency Plan (MCP) and exempt from state permitting? Yes <input checked="" type="checkbox"/> No ___			

<p>e) Is site/facility subject to any State permitting or other action which is causing the generation of discharge? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "yes," please list:</p> <ol style="list-style-type: none"> <li>1. site identification # assigned by the state of NH or MA: RTN 3-0585</li> <li>2. permit or license # assigned: Release Abatement Measure (RAM)</li> <li>3. state agency contact information: name, location, and telephone number: MASSDEP Waste Site Clean-up, Northeast Region, 978-694-3200</li> </ol>	<p>f) Is the site/facility covered by any other EPA permit, including:</p> <ol style="list-style-type: none"> <li>1. multi-sector storm water general permit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/>, if Y, number:</li> <li>2. phase I or II construction storm water general permit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/>, if Y, number:</li> <li>3. individual NPDES permit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/>, if Y, number:</li> <li>4. any other water quality related permit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/>, if Y, number:</li> </ol>
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**2. Discharge information.** Please provide information about the discharge, (attaching additional sheets as needed) including:

<p>a) Describe the discharge activities for which the owner/applicant is seeking coverage:</p> <p style="text-align: center;">Temporary construction dewatering in support of new below grade utility construction</p>			
<p>b) Provide the following information about each discharge:</p>	<table border="1"> <tr> <td style="vertical-align: top;"> <p>1) Number of discharge points:</p> <p style="text-align: center;">4</p> </td> <td style="vertical-align: top;"> <p>2) What is the <b>maximum</b> and <b>average flow rate</b> of discharge (in cubic feet per second, ft<sup>3</sup>/s)? Max. flow <u>0.668</u></p> <p>Average flow <u>0.668</u> Is maximum flow a <b>design value</b>? Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.</p> </td> </tr> </table>	<p>1) Number of discharge points:</p> <p style="text-align: center;">4</p>	<p>2) What is the <b>maximum</b> and <b>average flow rate</b> of discharge (in cubic feet per second, ft<sup>3</sup>/s)? Max. flow <u>0.668</u></p> <p>Average flow <u>0.668</u> Is maximum flow a <b>design value</b>? Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.</p>
<p>1) Number of discharge points:</p> <p style="text-align: center;">4</p>	<p>2) What is the <b>maximum</b> and <b>average flow rate</b> of discharge (in cubic feet per second, ft<sup>3</sup>/s)? Max. flow <u>0.668</u></p> <p>Average flow <u>0.668</u> Is maximum flow a <b>design value</b>? Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.</p>		
<p>3) Latitude and longitude of each discharge within 100 feet: pt.1: long. <u>-71.244835</u> lat. <u>42.3653616</u>; pt.2: long. <u>-71.2444925</u> lat. <u>42.3665665</u>; pt.3: long. <u>-71.244320869</u> lat <u>42.367073865</u>; pt.4: long. <u>-71.24414920</u> lat. <u>42.36758118</u>;</p>			
<p>4) If hydrostatic testing, total volume of the discharge (gals):</p>	<p>5) Is the discharge intermittent <input checked="" type="checkbox"/> or seasonal <input type="checkbox"/>?</p> <p>Is discharge ongoing Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>?</p>		
<p>c) Expected dates of discharge (mm/dd/yy): start <u>08/15/08</u> end _____</p>			
<p>d) Please attach a line drawing or flow schematic showing water flow through the facility including:</p> <p>1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).</p>			

See attached Proposed Treatment System Schematic (Figure 3) and Proposed Dewatering Discharge Route (Figure 4)

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for **all** of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within.

Gasoline Only	VOC Only	Primarily Metals	Urban Fill Sites	Contaminated Sumps	Mixed Contaminants ✓	Aquifer Testing
Fuel Oils (and Other Oils) only	VOC with Other Contaminants	Petroleum with Other Contaminants	Listed Contaminated Sites ✓	Contaminated Dredge Condensates	Hydrostatic Testing of Pipelines/Tanks	Well Development or Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method (mg/l)	Maximum daily value		Avg. daily value	
							concentration (mg/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids		✓	3	grab	2540D	5	76			
2. Total Residual Chlorine	✓		3	grab	4500 CL-D	0.02	ND			
3. Total Petroleum Hydrocarbons		✓	3	grab	1664A	4	ND			
4. Cyanide		✓	3	grab	4500 CN-CE	0.005	0.007			
5. Benzene	✓		3	grab	8260	0.001	ND			
6. Toluene	✓		3	grab	8260	0.0075	ND			
7. Ethylbenzene	✓		3	grab	8260	0.001	ND			
8. (m,p,o) Xylenes	✓		3	grab	8260	0.002	ND			
9. Total BTEX <sup>4</sup>	✓		3	grab	8260		ND			

<sup>4</sup>BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method (mg/l)	Maximum daily value		Avg. daily value	
							concentration (mg/l)	mass (kg)	concentration (ug/l)	mass (kg)
10. Ethylene Dibromide <sup>5</sup> (1,2- Dibromo-methane)	✓		3	grab	504	0.000019	ND			
11. Methyl-tert-Butyl Ether (MtBE)	✓		3	grab	8260	0.002	ND			
12. tert-Butyl Alcohol (TBA)										
13. tert-Amyl Methyl Ether (TAME)										
14. Naphthalene	✓		3	grab	8260	0.005	ND			
15. Carbon Tetra-chloride	✓		3	grab	8260	0.001	ND			
16. 1,4 Dichlorobenzene	✓		3	grab	8260	0.005	ND			
17. 1,2 Dichlorobenzene	✓		3	grab	8260	0.005	ND			
18. 1,3 Dichlorobenzene	✓		3	grab	8260	0.005	ND			
19. 1,1 Dichloroethane		✓	3	grab	8260	0.005	0.01			
20. 1,2 Dichloroethane	✓		3	grab	8260	0.001	ND			
21. 1,1 Dichloroethylene		✓	3	grab	8260	0.0005	0.0018			
22. cis-1,2 Dichloro-ethylene		✓	3	grab	8260	0.00075	0.075			
23. Dichloromethane (Methylene Chloride)	✓		3	grab	8260	0.005	ND			
24. Tetrachloroethylene	✓		3	grab	8260	0.001	ND			

<sup>5</sup>EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method (mg/l)	Maximum daily value		Avg. daily Value	
							concentration (mg/l)	mass (kg)	concentration (ug/l)	mass (kg)
25. 1,1,1 Trichloroethane		✓	3	grab	8260	0.005	0.0016			
26. 1,1,2 Trichloroethane	✓		3	grab	8260	0.0015	ND			
27. Trichloroethylene		✓	3	grab	8260	0.0005	0.54			
28. Vinyl Chloride		✓	3	grab	8260	0.001	0.042			
29. Acetone	✓		3	grab	8260	0.01	ND			
30. 1,4 Dioxane										
31. Total Phenols	✓		3	grab	420.1	0.03	ND			
32. Pentachlorophenol	✓		3	grab	8260	0.01	ND			
33. Total Phthalates <sup>6</sup> (Phthalate esthers)	✓		3	grab	8270	0.005	ND			
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	✓		3	grab	8270	0.005	ND			
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)			3	grab	8270					
a. Benzo(a) Anthracene	✓		3	grab	8270	0.005	ND			
b. Benzo(a) Pyrene	✓		3	grab	8270	0.005	ND			
c. Benzo(b)Fluoranthene	✓		3	grab	8270	0.005	ND			
d. Benzo(k) Fluoranthene	✓		3	grab	8270	0.005	ND			
e. Chrysene	✓		3	grab	8270	0.005	ND			

<sup>6</sup>The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method (mg/l)	Maximum daily value		Average daily value	
							concentration (mg/l)	mass (kg)	concentration (ug/l)	mass (kg)
f. Dibenzo(a,h) anthracene	✓		3	grab	8270	0.005	ND			
g. Indeno(1,2,3-cd) Pyrene	✓		3	grab	8270	0.007	ND			
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)			3	grab						
h. Acenaphthene	✓		3	grab	8270	0.005	ND			
i. Acenaphthylene			3	grab	8270	0.005	ND			
j. Anthracene	✓		3	grab	8270	0.005	ND			
k. Benzo(ghi) Perylene	✓		3	grab	8270	0.005	ND			
l. Fluoranthene	✓		3	grab	8270	0.005	ND			
m. Fluorene	✓		3	grab	8270	0.005	ND			
n. Naphthalene-	✓		3	grab	8270	0.005	ND			
o. Phenanthrene	✓		3	grab	8270	0.005	ND			
p. Pyrene	✓		3	grab	8270	0.005	ND			
37. Total Polychlorinated Biphenyls (PCBs)	✓		3	grab	608	0.00025	ND			
38. Antimony	✓		3	grab	6020	0.0005	ND			
39. Arsenic		✓	3	grab	6020	0.0005	0.0396			
40. Cadmium		✓	3	grab	6020	0.0002	0.0004			
41. Chromium III		✓	3	grab	6020	0.0005	0.0013			
42. Chromium VI	✓		3	grab	3500 CR-D	0.01	ND			

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method (mg/l)	Maximum daily value		Avg. daily value	
							concentration (mg/l)	mass (kg)	concentration (ug/l)	mass (kg)
43. Copper		✓	3	grab	6020	0.0005	0.0536			
44. Lead		✓	3	grab	6020	0.0005	0.0937			
45. Mercury		✓	3	grab	245.1	0.0002	0.0075			
46. Nickel		✓	3	grab	6020	0.0005	0.0091			
47. Selenium		✓	3	grab	6020	0.001	0.002			
48. Silver		✓	3	grab	6020	0.004	0.0024			
49. Zinc		✓	3	grab	6020	0.005	0.8816			
50. Iron		✓	3	grab	200.7	0.05	20			
Other (describe):										

c) For discharges where **metals** are believed present, please fill out the following:

<p><i>Step 1:</i> Do any of the metals in the influent have a <b>reasonable potential</b> to exceed the effluent limits in Appendix III (i.e., the limits set at zero to five dilutions)? Y <input checked="" type="checkbox"/> N <input type="checkbox"/></p>	<p>If yes, which metals? <b>As, Cd, Cu, Fe, Pb, Hg, Ag, Zn</b></p>
<p><i>Step 2:</i> For any metals which have <b>reasonable potential</b> to exceed the <b>Appendix III</b> limits, calculate the <b>dilution factor (DF)</b> using the formula in Part I.A.3.c) (step 2) of the NOI instructions or as determined by the State prior to the submission of this NOI.          What is the dilution factor for applicable metals?          Metals: As, Cd, Cu, Fe, Pb, Hg, Ag, Zn          DF: <u>22.4</u></p>	<p>Look up the limit calculated at the corresponding dilution factor in <b>Appendix IV</b>. Do any of the metals in the <b>influent</b> have the potential to exceed the corresponding <b>effluent</b> limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)?          Y <input checked="" type="checkbox"/> N <input type="checkbox"/> If "Yes," list which metals: <b>Cu, Pb, Hg, Zn, Fe</b></p>

**4. Treatment system information.** Please describe the treatment system using separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system:						
b) Identify each applicable treatment unit (check all that apply):	Frac. tank <input checked="" type="checkbox"/>	Air stripper	Oil/water separator	Equalization tanks	Bag filter <input checked="" type="checkbox"/>	GAC filter <input checked="" type="checkbox"/>
	Chlorination	Dechlorination	Other (please describe): GAC, Ion Exchange, Precipitation System, if necessary			
c) Proposed <b>average</b> and <b>maximum flow rates</b> (gallons per minute) for the discharge and the <b>design flow rate(s)</b> (gallons per minute) of the treatment system: Average flow rate of discharge <u>300</u> Maximum flow rate of treatment system <u>300</u> Design flow rate of treatment system _____						
d) A description of chemical additives being used or planned to be used (attach MSDS sheets): <b>See attached fact sheets and MSDSs</b>						

**5. Receiving surface water(s).** Please provide information about the receiving water(s), using separate sheets as necessary:

a) Identify the discharge pathway:	Direct <input checked="" type="checkbox"/>	Within facility <input type="checkbox"/>	Storm drain <input checked="" type="checkbox"/>	River/brook <input checked="" type="checkbox"/>	Wetlands <input type="checkbox"/>	Other (describe):
b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: <b>The effluent will be discharged to a site drain manhole, draining to adjacent Charles River, or directly into the Charles River.</b>						
c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water: 1. For multiple discharges, number the discharges sequentially. 2. For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.						
d) Provide the state water quality classification of the receiving water <u>B Warm Water</u> ,						
e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water <u>14.3</u> cfs Please attach any calculation sheets used to support stream flow and dilution calculations.						
f) Is the receiving water a listed 303(d) water quality impaired or limited water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, for which pollutant(s)? See Attachment A						
Is there a TMDL? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, for which pollutant(s)? Pathogens						

**6. Results of Consultation with Federal Services:** Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII.

a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes ___ No <input checked="" type="checkbox"/>
Has any consultation with the federal services been completed? Yes ___ No <input checked="" type="checkbox"/> or is consultation underway? Yes ___ No <input checked="" type="checkbox"/>
What were the results of the consultation with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service (check one): a "no jeopardy" opinion? ___ or written concurrence ___ on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?
b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge? Yes <input checked="" type="checkbox"/> No ___ Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes ___ No <input checked="" type="checkbox"/>

**7. Supplemental information. :**

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.
--

**8. Signature Requirements:** The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

*I certify under penalty of law that 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.*

Facility/Site Name:	THE WATCH FACTORY REDEVELOPMENT PROJECT
Owner signature:	<i>Eric Edman</i>
Title:	Project Manager
Date:	8/12/08

**6. Results of Consultation with Federal Services:** Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII.

a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes ___ No <input checked="" type="checkbox"/>
Has any consultation with the federal services been completed? Yes ___ No <input checked="" type="checkbox"/> or is consultation underway? Yes ___ No <input checked="" type="checkbox"/>
What were the results of the consultation with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service (check one): a "no jeopardy" opinion? ___ or written concurrence ___ on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?
b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge? Yes <input checked="" type="checkbox"/> No ___ Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes ___ No <input checked="" type="checkbox"/>

**7. Supplemental information. :**

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.
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**8. Signature Requirements:** The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

*I certify under penalty of law that 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.*

Facility/Site Name: THE WATCH FACTORY REDEVELOPMENT PROJECT
Operator signature:  FOR TED SIRAKIAN
Title: ASSISTANT PROJECT MANAGER
Date: 8/12/08

Watch Factory Redevelopment Project  
Waltham, MA  
NPDES RGP

The 7Q10 (the minimum flow (cfs) for 7 consecutive days with a recurrence interval of 10 years) has been calculated at the USGS Gaging Station No. 01104500 (at the Charles River at Waltham, MA) at 14.3 cubic feet per second (cfs). This Gaging Station is located approximately 0.5 miles downstream of the portion of the Charles River where discharge is anticipated under the NPDES RGP permit submitted for the Watch Factory Redevelopment Project, in Waltham, MA. Therefore the 7Q10 of 14.3 cfs will be used in determining the Dilution Factor.

The 7Q10 provided above has been obtained from "Water Resources and Aquifer Yields in the Charles River Basin (Water Resources Investigations Report 88-4173)" by Charles F. Myette and Alison C. Simcox, published by The Department of the Interior, United States Geological Survey.

The drainage area of the Charles River is 227 square miles at the Charles River at Waltham, MA, as documented in Water Resources of the Charles River Basin (Hydrologic Investigations Atlas HA-554)" by E.H. Walker, S.W. Wandle, Jr., and W.W. Caswell, published by The Department of the Interior, United States Geological Survey.

7Q10 = Inferred from the Water Resources Investigations Report 88-4173 for the Charles River at Waltham = 9.24 MGD or 14.3 cubic feet per second

$$Q_d = 300 \text{ gpm} = 0.668$$
$$DF = (Q_d + Q_s) / Q_d$$

Where:           DF       = Dilution Factor  
Q<sub>d</sub>       = Maximum flow rate of the discharge in cubic feet per second (cfs)  
Q<sub>s</sub>       = Receiving water 7Q10 (cfs) where,  
7Q10       = The minimum flow (cfs) for 7 consecutive days with a recurrence interval of 10 years

$$DF = (0.668 + 14.3) / 0.668$$
$$DF = 22.4$$

Therefore, with a Dilution Factor of 22.4, utilize column with Dilution Range Concentration of 10 - 50 in Appendix IV in the NPDES RGP.