UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL

January 18, 2011

Onno Boswinkel,
Vice-President
Acme Staple Company
87 Hill Road
Franklin, New Hampshire 03235

Re: Authorization to discharge under the Remediation General Permit (RGP) – 910000. Acme Staple Company, Inc. site located at 87 Hill Road, Franklin, Merrimack County, Authorization # NHG910001- Reissuance

Dear Mr. Boswinkel:

Based on the review of a Notice of Intent (NOI) submitted on behalf of Acme Staple Company Inc., by the firm Sanborn, Head & Associates, Inc., for the site referenced above, the U.S. Environmental Protection Agency (EPA) hereby authorizes you, as the named Operator, to discharge in accordance with the provisions of the RGP at that site.

This letter and authorization terminate any and all exclusion letters and monitoring requirements, as well as the RGP authorization that EPA issued for discharges at this site prior to this date. Your authorization number is listed above.

The checklist enclosed with this RGP authorization indicates the pollutants for which you are required to monitor. Also indicated on the checklist are the effluent limits, test methods and minimum levels (MLs) for each pollutant. Please note that the check list does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of this permit, including influent and effluent monitoring, narrative water quality standards, record keeping, and reporting requirements, found in Parts I and II, and Appendices I – VIII of the RGP. See EPA's website for the complete RGP and other information at: http://www.epa.gov/region1/npdes/mass.html#dgp.

Please note that EPA has included chloroform in the list of pollutants to be monitored based on a state certification request by the State of New Hampshire, Department of Environmental Services (NHDES), the reason for this request is "to prevent the migration

of a contaminant plume with higher concentrations toward a public water supply well". (Please see attached copy of the State DES certification request).

Also, included in the list is total dichlorobenzene and copper. Total dichlorobenzene was included because you have not provided us with laboratory data or any information to substantiate you determination that the pollutant is believed absent; copper because you have marked it believed present in the NOI application. This pollutant is dilution dependent subject to limitations based on a dilution factor range (DFR), due to the ample dilution at the point of discharge (2,749) the DFR applicable for this pollutant is equal to the Ceiling Value DFR established in the RGP. (See the RGP Appendix IV for New Hampshire facilities). Therefore, the limit for copper of 2,070 ug/L shall not be exceeded in the discharge.

In addition please note that this authorization is subject to a recertification if the operations at the site result in a discharge lasting longer than six months. A recertification can be submitted to EPA within six (6) to twelve (12) months of operations in accordance with the 2010 RGP requirements.

This general permit and authorization to discharge will expire on September 9, 2015. You have reported that the site termination is unknown. If for any reason the discharge terminates at certain point in the future you are required to submit a Notice of Termination (NOT) to the attention of the contact person indicated below within 30 days of project completion.

Thank you in advance for your cooperation in this matter. Please contact Victor Alvarez at 617-918-1572 or Alvarez.Victor@epa.gov, if you have any questions.

Sincerely,

David M. Webster, Chief
Industrial Permits Branch

Enclosure

cc: Jeffry Andrews, NHDES
Andrew E. Ashton, Sanborn Head& Associates, Inc.

2010 Remediation General Permit
Summary of Monitoring Parameters[11]

NPDES Permit Number:	**NHG910001-Reissuance**
Date Permit Issued:	January, 2011
Facility/Site Name:	Acme Staple Company, Inc.
Facility/Site Address:	87 Hill Road, Franklin, NH 03235, Merrimack County
	Email address of owner:onnob@acmestaple.com; Phone n: 603-934-2320
Legal Name of operator:	Acme Staple Company, Inc.
Operator contact name, title, and Address:	Onno Boswinkel, Vice-President
	Email: Same as of Owner
Estimated Date of Completion:	Unknown
Category and Sub-Category:	Category II- Non Petroleum Site Remediation. Sub-category A. Volatile Organics Only Sites
Receiving Water:	Pemigewasset River

Monitoring & Limits are applicable if checked. All samples are to be collected as grab samples

	Parameter	**Effluent Limit/Method#/ML** (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	1. Total Suspended Solids (TSS)	30 milligrams/liter (mg/l) **, 50 mg/l for hydrostatic testing **, Me#60.2/5mL
	2. Total Residual Chlorine (TRC) [1]	Freshwater = 11 ug/l ** Saltwater = 7.5 ug/l **/ Me#330.5/ML 20ug/L
	3. Total Petroleum Hydrocarbons (TPH)	5.0 mg/l/ Me# 1664A/5.0mg/LmL
	4. Cyanide (CN) [2, 3]	Freshwater = 5.2 ug/l ** Saltwater = 1.0 ug/l **/ Me#335.4/ML 5ug/L
	5. Benzene (B)	5ug/L /50.0 ug/l for hydrostatic testing only/ Me#8260C/ML 2 ug/L
	6. Toluene (T)	(limited as ug/L total BTEX)/ Me#8260C/ ML 2ug/L
	7. Ethylbenzene (E)	(limited as ug/L total BTEX))/ Me#8260C/ ML 2ug/L
	8. (m,p,o) Xylenes (X)	(limited as ug/L total BTEX))/ Me#8260C/ ML 2ug/L
	9. Total Benzene, Toluene, Ethyl Benzene, and Xylenes (BTEX) [4]	100 ug/l)/ Me#8260C/ ML 2ug/L
	10. Ethylene Dibromide (EDB) (1,2- Dibromoethane)	0.05 ug/l/ Me#8260C/ ML 10ug/L
	11. Methyl-tert-Butyl Ether (MtBE)	70.0 ug/l /Me#8260C/ ML 10ug/L
	12.tert-Butyl Alcohol (TBA) (TertiaryButanol)	Monitor Only (ug/L)/ Me#8260C/ ML 10ug/L
	13. tert-Amyl Methyl Ether	Monitor Only (ug/L) /Me#8260C/ ML 10ug/L

	Parameter	Effluent Limit/Method#/ML (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	(TAME)	
	14. Naphthalene [5]	20 ug/l /Me#8260C/ ML 2ug/L
	15. Carbon Tetrachloride	4.4 ug/l /Me#8260C/ ML 5ug/L
	16. 1,2 Dichlorobenzene (o-DCB)	600 ug/l /Me#8260C/ ML 5ug/L
	17. 1,3 Dichlorobenzene (m-DCB)	320 ug/l /Me#8260C/ ML 5ug/L
	18. 1,4 Dichlorobenzene (p-DCB)	5.0 ug/l /Me#8260C/ ML 5ug/L
√	18a. Total dichlorobenzene	763 ug/l - NH only /Me#8260C/ ML5ug/L
	19. 1,1 Dichloroethane (DCA)	70 ug/l /Me#8260C/ ML 5ug/L
	20. 1,2 Dichloroethane (DCA)	5.0 ug/l /Me#8260C/ ML 5ug/L
	21. 1,1 Dichloroethene (DCE)	3.2 ug/l/Me#8260C/ ML 5ug/L
	22. cis-1,2 Dichloroethene (DCE)	70 ug/l /Me#8260C/ ML 5ug/L
	23. Methylene Chloride	4.6 ug/l/Me#8260C/ ML 5ug/L
	24. Tetrachloroethene (PCE)	5.0 ug/l /Me#8260C/ ML 5ug/L
	25. 1,1,1 Trichloro-ethane (TCA)	200 ug/l/Me#8260C/ ML 5ug/L
	26. 1,1,2 Trichloro-ethane (TCA)	5.0 ug/l /Me#8260C/ ML 5ug/L
	27. Trichloroethene (TCE)	5.0 ug/l /Me#8260C/ ML 5ug/L
	28. Vinyl Chloride (Chloroethene)	2.0 ug/l /Me#8260C/ ML 5ug/L
	29. Acetone	Monitor Only (ug/L) /Me#8260C/ ML 50ug/L
	30. 1,4 Dioxane	Monitor Only /Me#1624C/ML 50ug/L
	31. Total Phenols	300 ug/l Me#420.1&420.2/ML 2ug/L/ Me# 420.4 /ML 50ug/L
	32. Pentachlorophenol (PCP)	1.0 ug/l /Me#8270D/ML5ug/L,Me#604 &625/ML 10ug/L
	33. Total Phthalates (Phthalate esters) [6]	3.0 ug/L ** /Me#8270D/M L5 ug/L, Me#606/ML 10ug/L & Me#625/ML 5ug/L
	34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	6.0 ug/l /Me#8270D/ML5ug/L,Me#606/ML10ug/L& Me#625/ML5ug/L
	35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	10.0 ug/l
	a. Benzo(a) Anthracene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	b. Benzo(a) Pyrene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	c. Benzo(b)Fluoranthene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L

	Parameter	Effluent Limit/Method#/ML (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	d. Benzo(k)Fluoranthene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML5ug/L& Me#625/ML 5ug/L
	e. Chrysene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML5ug/L& Me#625/ML 5ug/L
	f. Dibenzo(a,h)anthracene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	g. Indeno(1,2,3-cd) Pyrene [7]	0.0038 ug/l /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	100 ug/l
	h. Acenaphthene	5ug/L/Me#8270D/ML 5ug/L/Me#610/ML 5ug/L & Me#625/ML 5ug/L & Me#610 (HPLC)/ ML 2ug/L
	i. Acenaphthylene	5ug/L/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	j. Anthracene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	k. Benzo(ghi) Perylene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	l. Fluoranthene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	m. Fluorene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	n. Naphthalene [5]	20 ug/l / Me#8270D/ ML5ug/L, Me#610/ML5ug/L & Me#625/ML5ug/L
	o. Phenanthrene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	p. Pyrene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	37. Total Polychlorinated Biphenyls (PCBs) [8, 9]	0.000064 ug/L / Me# 608/ ML 0.5 ug/L
√	38. Chloride	Monitor only/Me# 300.0/ ML 0.1ug/L

	Metal parameter			Total Recoverable Metal Limit @ H [10] = 25 mg/l CaCO3 for Discharges in New Hampshire (ug/l) [11]	
				Freshwater	Saltwater
	39. Antimony			5.6/10mL	
	40. Arsenic **			10/Ml 20ug/	36/20mL
	41. Cadmium **			0.8/10mL	9.3/10mL
	42. Chromium III (trivalent) **			27.7/15mL	100/15mL
	43. Chromium VI (hexavalent) **			11.4/10mL	50.3/10mL

	Metal parameter			Total Recoverable Metal Limit @ H [10] = 25 mg/l CaCO3 for Discharges in New Hampshire (ug/l) [11]	
				Freshwater	Saltwater
√	44. Copper **			2,070/15mL	3.7/15mL
	45. Lead **			0.5/20mL	8.5/20mL
	46. Mercury **			0.9/0.2mL	1.1/0.2mL
	47. Nickel **			16.1/20mL	8.2/20mL
	48. Selenium **			5/20mL	71/20mL
	49. Silver			0.4/10mL	2.2/10mL
	50. Zinc **			37/15mL	85.6/15mL
	51. Iron			1,000/20mL	

	Other Parameters	Limit
√	52. Instantaneous Flow	Site specific in CFS
√	53. Total Flow	Site specific in CFS
	54. pH Range for Class A & Class B Waters in MA	6.5-8.3; 1/Month/Grab[13]
	55. pH Range for Class SA & Class SB Waters in MA	6.5-8.3; 1/Month/Grab[13]
√	56. pH Range for Class B Waters in NH	6.5-8; 1/Month/Grab[13]
	57. Daily maximum temperature - Warm water fisheries	83°F; 1/Month/Grab[14]
	58. Daily maximum temperature - Cold water fisheries	68°F; 1/Month/Grab[14]
	59. Maximum Change in Temperature in MA - Any Class A water body	1.5°F; 1/Month/Grab[14]
	60. Maximum Change in Temperature in MA - Any Class B water body- Warm Water	5°F; 1/Month/Grab[14]
	61. Maximum Change in Temperature in MA – Any Class B water body - Cold water and Lakes/Ponds	3°F; 1/Month/Grab[14]
	62. Maximum Change in Temperature in MA – Any Class SA water body - Coastal	1.5°F; 1/Month/Grab[14]
	63. Maximum Change in Temperature in MA – Any Class SB water body - July to September	1.5°F; 1/Month/Grab[14]
	64. Maximum Change in Temperature in MA – Any Class SB water body - October to June	4°F; 1/Month/Grab[14]
√	Chloroform	Monitoring Only

Footnotes:

[1] Although the maximum values for TRC are 11ug/l and 7.5 ug/l for freshwater, and saltwater respectively, the compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI (i.e., Method 330.5, 20 ug/l).
[2] Limits for cyanide are based on EPA's water quality criteria expressed as micrograms per liter. There is currently no EPA approved test method for free cyanide. Therefore, total cyanide must be reported.
[3] Although the maximum values for cyanide are 5.2 ug/l and 1.0 ug/l for freshwater and saltwater, respectively, the compliance limits are equal to the minimum level (ML) of the Method 335.4 as listed in Appendix VI (i.e., 10 ug/l).
[4] BTEX = sum of Benzene, Toluene, Ethylbenzene, and total Xylenes.
[5] Naphthalene can be reported as both a purgeable (VOC) and extractable (SVOC) organic compound. If both VOC and SVOC are analyzed, the highest value must be used unless the QC criteria for one of the analyses is not met. In such cases, the value from the analysis meeting the QC criteria must be used.
[6] The sum of individual phthalate compounds(not including the #34, Bis (2-Ethylhexyl) Phthalate . The compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI.
Total values calculated for reporting on NOIs and discharge monitoring reports shall be calculated by adding the measured concentration of each constituent. If the measurement of a constituent is less than the ML, the permittee shall use a value of zero for that constituent. For each test, the permittee shall also attach the raw data for each constituent to the discharge monitoring report, including the minimum level and minimum detection level for the analysis.
[7] Although the maximum value for the individual PAH compounds is 0.0038 ug/l, the compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI.
[8] 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 "Oroclor analyses."Total values calculated for reporting on NOIs and discharge monitoring reports shall be calculated by adding the measured concentration of each constituent. If the measure of a constituent is less than the ML, the permittee shall use a value of zero for that constituent. For each test, the permittee shall also attach the raw data for each constituent to the discharge monitoring report, including the minimum level and minimum detection level for the analysis.
[9]Although the maximum value for total PCBs is 0.000064 ug/l, the compliance limit is equal to the minimum level (ML) of the test method used as listed in Appendix VI (i.e., 0.5 ug/l for Method 608 or 0.00005 ug/l when Method 1668a is approved).
[10] Hardness. Cadmium, Chromium III, Copper, Lead, Nickel, Silver, and Zinc are Hardness Dependent.
[11] For a Dilution Factor (DF) from 1 to 5, metals limits are calculated using DF times the base limit for the metal. See Appendix IV. For example, iron limits are calculated using DF x 1,000ug/L (the iron base limit). Therefore DF is 1.5, the iron limit will be 1,500 ug/L; DF 2, then iron limit =1,000 x 2 =2,000 ug/L., etc. not to exceed the DF=5.
[12] Minimum Level (ML) is the lowest level at which the analytical system gives a recognizable signal and acceptable calibration point for the analyte. The ML represents the lowest concentration at which an analyte can be measured with a known level of confidence. The ML is calculated by multiplying the laboratory-determined method detection limit by 3.18 (see 40 CFR Part 136, Appendix B).
[13] pH sampling for compliance with permit limits may be performed using field methods as provided for in EPA test Method 150.1.
[14] Temperature sampling per Method 170.1

SANBORN HEAD
Building Trust. Engineering Success.

U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912
ATTN: Remediation General Permit NOI Processing

December 09, 2010
File No. 2584.02

Re: Remediation General Permit, Notice of Intent
Acme Staple Inc.
Franklin, New Hampshire
NHDES Site No. 198705001

To Whom It May Concern:

Sanborn, Head & Associates, Inc. has prepared this National Pollution Discharge Elimination System (NPDES) Notice of Intent (NOI) for a Remediation General Permit (RGP) at the request of Acme Staple Company, Inc. of 87 Hill Road, Franklin, New Hampshire. The RGP is requested for the continuation of discharge from the on-site groundwater treatment system to the adjacent Pemigewasset River.

The groundwater treatment system is operated for the removal of volatile organic compounds (VOCs) from groundwater at the site. Existing analytical data for the treatment system shows that VOCs are limited to chloroform. Copper is also present in groundwater at the site, but typically at concentrations less than the RGP effluent limits. Dilution calculations performed for the discharge to the Pemigewasset River show that copper is unlikely to adversely impact the river as a result of the discharge.

Should you have any questions with regard to the information provided with this NOI, please contact us.

Very truly yours,
SANBORN, HEAD & ASSOCIATES, INC.

Andrew E. Ashton
Senior Project Hydrogeologist
20 Foundry Street
Concord, New Hampshire 03301

Paul L. Rydel, P.G.
Associate Principal
20 Foundry Street
Concord, New Hampshire 03301

AEA/KEAS/PLR: aea/keas

Encl. Notice of Intent (NOI) Form

cc: New Hampshire Department of Environmental Services

Water Division
Wastewater Engineering Bureau
P.O. Box 95
Concord, New Hampshire 03302-0095

Town of Franklin

S:\CONDATA\2500s\2584.02\Originals\2010 RGP NOI\20101209 NOI Cover Letter.docx

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

1. General facility/site information. Please provide the following information about the site:

a) Name of **facility/site**: Acme Staple Company, Inc.		**Facility/site** mailing address:		
Location of **facility/site**: longitude: W71 39 35 latitude: N43 27 43	Facility SIC code(s): 3315	Street: 87 Hill Road		
b) Name of **facility/site owner:** Acme Staple Company,Inc.		Town: Franklin		
Email address of facility/site owner: onnob@acmestaple.com		State: New Hampshire	Zip: 03235	County: Merrimack
Telephone no. of facility/site **owner**: (603)-934-2320				
Fax no. of facility/site **owner**: (603)-934-6199		**Owner** is (check one): 1. Federal__○__ 2. State/Tribal__○__ 3. Private ◉ 4. Other ○ if so, describe:		
Address of **owner** (if different from site):				
Street:				
Town:	State:	Zip:	County:	
c) Legal name of **operator**:		**Operator** telephone no: (603) 934-2320		
Acme Staple Company, Inc.		**Operator** fax no.: (603) 934-6199	**Operator** email: onnob@acmestaple.com	
Operator contact name and title: Onno Boswinkel, V.P.				
Address of **operator** (if different from owner):	Street:			
Town:	State:	Zip:	County:	

d) Check Y for "yes" or N for "no" for the following:
1. Has a prior NPDES permit exclusion been granted for the discharge? Y ◉ N ○, if Y, number: NH0022438
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge?
Y ○ N ◉, if Y, date and tracking #:
3. Is the discharge a "new discharge" as defined by 40 CFR 122.2? Y ○ N ◉
4. For sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) and exempt from state permitting? Y ○ N ○

e) Is site/facility subject to any State permitting, license, or other action which is causing the generation of discharge? Y ◉ N ○
If Y, please list:
1. site identification # assigned by the state of NH or MA: NH DES #198705001, Project RSN #201
2. permit or license # assigned: GWP-198705001-F-004
3. state agency contact information: name, location, and telephone number:

David C. Bowen
NH DES Hazardous Waste Remediation Bureau
603-271-2800

f) Is the site/facility covered by any other EPA permit, including:
1. Multi-Sector General Permit? Y ○ N ◉,
if Y, number:
2. Final Dewatering General Permit? Y ○ N ◉,
if Y, number:
3. EPA Construction General Permit? Y ○ N ◉,
if Y, number:
4. Individual NPDES permit? Y ○ N ◉,
if Y, number:
5. any other water quality related individual or general permit? Y ○ N ◉, if Y, number:

g) Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y ○ N ◉

h) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls.

Activity Category	**Activity Sub-Category**
I - Petroleum Related Site Remediation	A. Gasoline Only Sites ☐ B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) ☐ C. Petroleum Sites with Additional Contamination ☐
II - Non Petroleum Site Remediation	A. Volatile Organic Compound (VOC) Only Sites ☒ B. VOC Sites with Additional Contamination ☐ C. Primarily Heavy Metal Sites ☐
III - Contaminated Construction Dewatering	A. General Urban Fill Sites ☐ B. Known Contaminated Sites ☐

IV - Miscellaneous Related Discharges	A. Aquifer Pump Testing to Evaluate Formerly Contaminated Sites ☐ B. Well Development/Rehabilitation at Contaminated/Formerly Contaminated Sites ☐ C. Hydrostatic Testing of Pipelines and Tanks ☐ D. Long-Term Remediation of Contaminated Sumps and Dikes ☐ E. Short-term Contaminated Dredging Drain Back Waters (if not covered by 401/404 permit) ☐

2. Discharge information. Please provide information about the discharge, (attaching additional sheets as necessary) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage:

The discharge is the outflow component of water from an on-site groundwater treatment system (see Figure 1, Process Flow Diagram).

b) Provide the following information about each discharge:

1) Number of discharge points: One

2) What is the **maximum** and **average flow rate** of discharge (in cubic feet per second, ft^3/s)?
Max. flow: 50 gpm Is maximum flow a **design value**? Y ○ N ◉
Average flow (include units): 42 gpm Is average flow a design value or estimate? No

3) Latitude and longitude of each discharge within 100 feet:
pt.1: lat. N43 27 37 long. W71 39 16 pt.2: lat. _____ long. _____;
pt.3: lat. _____ long. _____ pt.4: lat. _____ long. _____;
pt.5: lat. _____ long. _____ pt.6: lat. _____ long. _____;
pt.7: lat. _____ long. _____ pt.8: lat. _____ long. _____; etc.

4) If hydrostatic testing, total volume of the discharge (gals): _____

5) Is the discharge intermittent ○ or seasonal ○?
Is discharge ongoing? Y ◉ N ○

c) Expected dates of discharge (mm/dd/yy): start: Jan 1, 1989 end: Unknown

d) Please attach a line drawing or flow schematic showing water flow through the facility including:
1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).: 1) Groundwater Extraction Wells 2) None 3) see Process Flow Diagram 4) see Process Flow Diagram

3. Contaminant information.

a) Based on the sub-category selected (see Appendix III), indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
								concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids (TSS)		☒	☐								
2. Total Residual Chlorine (TRC)		☐	☐								
3. Total Petroleum Hydrocarbons (TPH)		☒	☐	1	grab	1664A	5 mg/l	<5,000	<1.64	<5,000	<1.37
4. Cyanide (CN)	57125	☐	☐								
5. Benzene (B)	71432	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
6. Toluene (T)	108883	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
7. Ethylbenzene (E)	100414	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
8. (m,p,o) Xylenes (X)	108883; 106423; 95476; 1330207	☒	☐	1	grab	8260B	1 ug/l	<2	<6.5E-4	<2	<5.5E-4
9. Total BTEX [2]	n/a	☒	☐		-	-	-	ND	-	ND	-
10. Ethylene Dibromide (EDB) (1,2-Dibromoethane) [3]	106934	☐	☐								
11. Methyl-tert-Butyl Ether (MtBE)	1634044	☐	☐								
12. tert-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	☐	☐								

***** Numbering system is provided to allow cross-referencing to Effluent Limits and Monitoring Requirements by Sub-Category included in Appendix III, as well as the Test Methods and Minimum Levels associated with each parameter provided in Appendix VI.

[2] BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

[3] EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
								concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
13. tert-Amyl Methyl Ether (TAME)	9940508	☐	☐								
14. Naphthalene	91203	☐	☐								
15. Carbon Tetrachloride	56235	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<5.5E-4
16. 1,2 Dichlorobenzene (o-DCB)	95501	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
17. 1,3 Dichlorobenzene (m-DCB)	541731	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
18. 1,4 Dichlorobenzene (p-DCB)	106467	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<2.7E-4
18a. Total dichlorobenzene		☒	☐	See Rows 16,	17, and 18			ND	-	ND	-
19. 1,1 Dichloroethane (DCA)	75343	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
20. 1,2 Dichloroethane (DCA)	107062	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
21. 1,1 Dichloroethene (DCE)	75354	☒	☐	1	grab	8260B	1 ug/l	<1	<3.3E-4	<1	<3.3E-4
22. cis-1,2 Dichloroethene (DCE)	156592	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
23. Methylene Chloride	75092	☒	☐	1	grab	8260B	5 ug/l	<5	<1.6E-3	<5	<1.6E-3
24. Tetrachloroethene (PCE)	127184	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
25. 1,1,1 Trichloro-ethane (TCA)	71556	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
26. 1,1,2 Trichloro-ethane (TCA)	79005	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4
27. Trichloroethene (TCE)	79016	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<6.5E-4

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
								concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
28. Vinyl Chloride (Chloroethene)	75014	☒	☐	1	grab	8260B	2 ug/l	<2	<6.5E-4	<2	<5.5E-4
29. Acetone	67641	☒	☐	1	grab	8260B	10 ug/l	<10	<3.3E-4	<10	<2.7E-3
30. 1,4 Dioxane	123911	☒	☐	1	grab	8260B SIM	1 ug/l	<1	<3.3E-4	<1	<2.7E-3
31. Total Phenols	108952	☒	☐	1	grab	625	2 ug/l	<1	<3.3E-4	<1	<2.7E-3
32. Pentachlorophenol (PCP)	87865	☒	☐	1	grab	625	5 ug/l1	<5	<1.6E-3	<5	<1.4-3
33. Total Phthalates (Phthalate esters) [4]		☒	☐	1	grab	625	5 ug/l	ND (<5)	-	ND	-
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	117817	☒	☐	1	grab	625	5 ug/l	<5	<1.6E-3	<5	<1.4E-3
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		☐	☐								
a. Benzo(a) Anthracene	56553	☐	☐								
b. Benzo(a) Pyrene	50328	☐	☐								
c. Benzo(b)Fluoranthene	205992	☐	☐								
d. Benzo(k)Fluoranthene	207089	☐	☐								
e. Chrysene	21801	☐	☐								
f. Dibenzo(a,h)anthracene	53703	☐	☐								
g. Indeno(1,2,3-cd) Pyrene	193395	☐	☐								
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		☐	☐								

[4] The sum of individual phthalate compounds.

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
								concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
h. Acenaphthene	83329	☐	☐								
i. Acenaphthylene	208968	☐	☐								
j. Anthracene	120127	☐	☐								
k. Benzo(ghi) Perylene	191242	☐	☐								
l. Fluoranthene	206440	☐	☐								
m. Fluorene	86737	☐	☐								
n. Naphthalene	91203	☐	☐								
o. Phenanthrene	85018	☐	☐								
p. Pyrene	129000	☐	☐								
37. Total Polychlorinated Biphenyls (PCBs)	85687; 84742; 117840; 84662; 131113; 117817.	☒	☐	1	grab	608/3510C	5 ug/l	ND(<0.5each)	-	ND(<0.5 each)	-
38. Chloride	16887006	☐	☐								
39. Antimony	7440360	☐	☐								
40. Arsenic	7440382	☐	☐								
41. Cadmium	7440439	☐	☐								
42. Chromium III (trivalent)	16065831	☐	☐								
43. Chromium VI (hexavalent)	18540299	☐	☐								
44. Copper	7440508	☐	☒	1	grab	200.8	0.5 ug/l	2	0.00546	2	0.00459
45. Lead	7439921	☐	☐								
46. Mercury	7439976	☐	☐								
47. Nickel	7440020	☐	☐								
48. Selenium	7782492	☐	☐								
49. Silver	7440224	☐	☐								
50. Zinc	7440666	☐	☐								
51. Iron	7439896	☒	☐	1	grab	200.8	50 ug/l	<50	<1.6E-2	<1.4 E-2	
Other (describe):		☐	☒								

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
								concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
Chlorofrom	67-66-3	☐	☒	1	grab	8260B	2 ug/l	3	0.0082	3	0.0069
		☐	☐								

b) For discharges where **metals** are believed present, please fill out the following (attach results of any calculations):

Step 1: Do any of the metals in the influent exceed the effluent limits in Appendix III (i.e., the limits set at zero dilution)? Y◉ N○	If yes, which metals? Copper
Step 2: For any metals which exceed the **Appendix III** limits, calculate the **dilution factor (DF)** 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? Metal: Copper DF: 2,749 Metal DF: Metal: DF: Metal: DF: Etc.	Look up the limit calculated at the corresponding dilution factor in **Appendix IV.** Do any of the metals in the **influent** have the potential to exceed the corresponding **effluent** limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? Y○ N◉ If Y, list which metals:

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:

Input water is derived from a series of groundwater extraction wells. The treatment system consists of a single tower air stripper for removal of VOCs. Treated water leaves the groundwater treatment building and discharges to the Pemigewasset River via a gravity drain system. Water is discharged on the river bed through an under-drain system. A diagram of the treatment system is shown in the Process Flow Diagram attached as Figure 1.

b) Identify each applicable treatment unit (check all that apply):	Frac. tank ☐	Air stripper ☒	Oil/water separator ☐	Equalization tanks ☐	Bag filter ☐	GAC filter ☐
	Chlorination ☐	De-chlorination ☐	Other (please describe):			

c) Proposed **average** and **maximum flow rates** (gallons per minute) for the discharge and the **design flow rate**(s) (gallons per minute) of the treatment system:
Average flow rate of discharge 42 gpm Maximum flow rate of treatment system 50 gpm
Design flow rate of treatment system 50 gpm

d) A description of chemical additives being used or planned to be used (attach MSDS sheets):

No chemical additives are used in the groundwater treatment system.

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

a) Identify the discharge pathway:	Direct to receiving water ☒	Within facility (sewer) ☐	Storm drain ☐	Wetlands ☐	Other (describe):

b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:

Water is transferred from the groundwater remediation system building to the discharge point via pipeline and discharges directly into the Pemigewasset River.

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 Class B

e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 340.5 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? Y ○ N ◉ If yes, for which pollutant(s)?

Is there a final TMDL? Y ○ N ◉ If yes, for which pollutant(s)?

6. ESA and NHPA Eligibility.

Please provide the following information according to requirements of Permit Parts I.A.4 and I.A.5 Appendices II and VII.

a) Using the instructions in Appendix VII and information on Appendix II, under which criterion listed in Part I.C are you eligible for coverage under this general permit?

A ◉ B ○ C ○ D ○ E ○ F ○

b) If you selected Criterion D or F, has consultation with the federal services been completed? Y ○ N ○ Underway ○

c) If consultation with U.S. Fish and Wildlife Service and/or NOAA Fisheries Service was completed, was a written concurrence finding that the discharge is "not likely to adversely affect" listed species or critical habitat received? Y ○ N ○

d) Attach documentation of ESA eligibility as described in the NOI instructions and required by Appendix VII, Part I.C, Step 4.

e) Using the instructions in Appendix VII, under which criterion listed in Part II.C are you eligible for coverage under this general permit?

1 ◉ 2 ○ 3 ○

f) If Criterion 3 was selected, attach all written correspondence with the State or Tribal historic preservation officers, including any terms and conditions that outline measures the applicant must follow to mitigate or prevent adverse effects due to activities regulated by the RGP.

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.

Table 1 - Summary of Influent and Effluent Analytical Data
Figure 1 - Process Flow Diagram
Figure 2 - Locus Plan
Figure 3 - Site Plan
Groundwater Treatment System Gravity Drain Details, Sheet 1 of 2, September 1995

Attachment A - Influent and Effluent Analytical Data (July 2009 and August 2010)
Attachment B - ESA and NHPA Eligibility
Attachment C - Dilution Calculation
Attachment D - Receiving Water Flow Data

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: Acme Staple Company, Inc.

Operator signature:

Printed Name &Title: ANNE BOSWINKEL – V.P.

Date: 12/8/10

TABLE

Table 1
Influent/Effluent Analytical Data Summary
2010 Remediation General Permit - Notice of Intent
Acme Staple Company, Inc.

									Concentrations in µg/L			
	Parameter	CAS No.	Believed Absent	Believed Present	Analytical Method	Minimum Level of Test Method	Effluent Limit	Analytical Method Used	Influent		Effluent	
	Category II Sub-category A - Volatile Organic Compound (VOC) Only Sites								7/26/2009	11/20/2010	7/26/2009	11/20/2010
3	Total Petroleum Hydrocarbons (TPH)	–	X		1664A	5 mg/L	5 mg/L	1664A	<5,000		<5,000	
5	Benzene (B)	71-43-2	X		8260C	2 µg/L	5 µg/L	8260B	<1	<1	<1	<1
6	Toluene (T)	108-88-3	X		8260C	2 µg/L		8260B	<1	<1	<1	<1
7	Ethylbenzene (E)	100-41-4	X		8260C	2 µg/L		8260B	<1	<1	<1	<1
8	Xylenes (m,p,o-) (X)	95-47-6 108-38-3 106-42-3 1330-20-7	X		8260C	4 µg/L		8260B	<2	<2	<2	<2
9	Total BTEX	–	X		8260C	2 µg/L	100 µg/L	8260B	ND	ND	ND	ND
15	Carbon Tetrachloride	106-93-4	X		8260C	5 µg/L	4.4 µg/L	8260B	<2	<2	<2	<2
16	Dichlorobenzene (1,2-)	95-50-1	X		8260C	5 µg/L	600 µg/L	8260B	<1	<1	<1	<1
17	Dichlorobenzene (1,3-)	541-73-1	X		8260C	5 µg/L	320 µg/L	8260B	<1	<1	<1	<1
18	Dichlorobenzene (1,4-)	106-46-7	X		8260C	5 µg/L	5.0 µg/L	8260B	<1	<1	<1	<1
18a	Total Dichlorobenzene	–	X		8260C	5 µg/L	763 µg/L	8260B	ND	ND	ND	ND
19	Dichloroethane (1,1-)	75-34-3	X		8260C	5 µg/L	70 µg/L	8260B	<2	<2	<2	<2
20	Dichloroethane (1,2-)	107-06-2	X		8260C	5 µg/L	5.0 µg/L	8260B	<2	<2	<2	<2
21	Dichloroethene (1,1-)	75-35-4	X		8260C	5 µg/L	3.2 µg/L	8260B	<1	<1	<1	<1
22	Dichloroethene (cis-1,2)	156-59-2	X		8260C	5 µg/L	70 µg/L	8260B	<2	<2	<2	<2
23	Methylene Chloride	75-09-2	X		8260C	5 µg/L	4.6 µg/L	8260B	<5	<5	<5	<5
24	Tetrachloroethen (PCE)	127-18-4	X		8260C	5 µg/L	5.0 µg/L	8260B	<2	<2	<2	<2
25	Trichloroethane (1,1,1-)	71-55-6	X		8260C	5 µg/L	200 µg/L	8260B	<2	<2	<2	<2
26	Trichloroethane (1,1,2-)	79-00-5	X		8260C	5 µg/L	5.0 µg/L	8260B	<2	<2	<2	<2
27	Trichloroethene (TCE)	79-01-6	X		8260C	5 µg/L	5.0 µg/L	8260B	<2	<2	<2	<2
28	Vinyl Chloride	75-01-4	X		8260C	5 µg/L	2.0 µg/L	8260B	<2	<2	<2	<2
29	Acetone	67-64-1	X		8260C	50 µg/L	Monitor Only (µg/L)	8260B	<10	<10	<10	<10
30	Dioxane (1,4-)	123-91-1	X		8260C	50 µg/L	Monitor Only (µg/L)	8260B-SIM	<1	<1	<1	<1
31	Phenol	108-95-2	X		8270D	2 µg/L	300 µg/L	625	<1		<1	
32	Pentachlorophenol	87-86-5	X		8270D	5 µg/L	1.0 µg/L	625	<0.25 (Method 8151)		<5 (Method 625)	
33	Total Phthalates (Phthalate Esters)	–	X				3.0 µg/L	625	ND		ND	
33a	Butylbenzyl Phthalate	85-68-7	X		8270D	5 µg/L		625	<1		<1	
33b	Di-n-butyl Phthalate	84-74-2	X		8270D	5 µg/L		625	<5		<5	
33c	Diethyl Phthalate	84-66-2	X		8270D	5 µg/L		625	<1		<1	
33d	Dimethyl Phthalate	131-11-3	X		8270D	5 µg/L		625	<1		<1	
33e	Di-n-octyl Phthalate	117-84-0	X		8270D	5 µg/L		625	<1		<1	
34	bis(2-Ethylhexyl)Phthalate	117-81-7	X		8270D	5 µg/L	6.0 µg/L	625	<5		<5	
37	Total Polychlorinated Biphenyls (PCBs)	–	X		608	0.5 µg/L	0.000064 µg/L	608/3510C	ND (<0.5 each)		ND (<0.5 each)	
38	Chloride	16887-00-6	X		300.0 SM 4110B	0.1 mg/L	Monitor Only (µg/L)					
44	Copper	7440-50-8		X	6020A 200.8	0.5 µg/L	285 µg/L	200.8	3	2	2	<1
51	Iron	7439-89-6	X		6020A 200.8	50 µg/L	5,000 µg/L	200.8		<50		<50
	Chloroform	67-66-3		X					2	3	<2	<2

Notes
1. Parameters presented are those listed under Category II Sub Category A - Volatile Organic Compound (VOC) Only Sites in the August 26, 2010 Remediation General Permit (RGP) Appendix III.

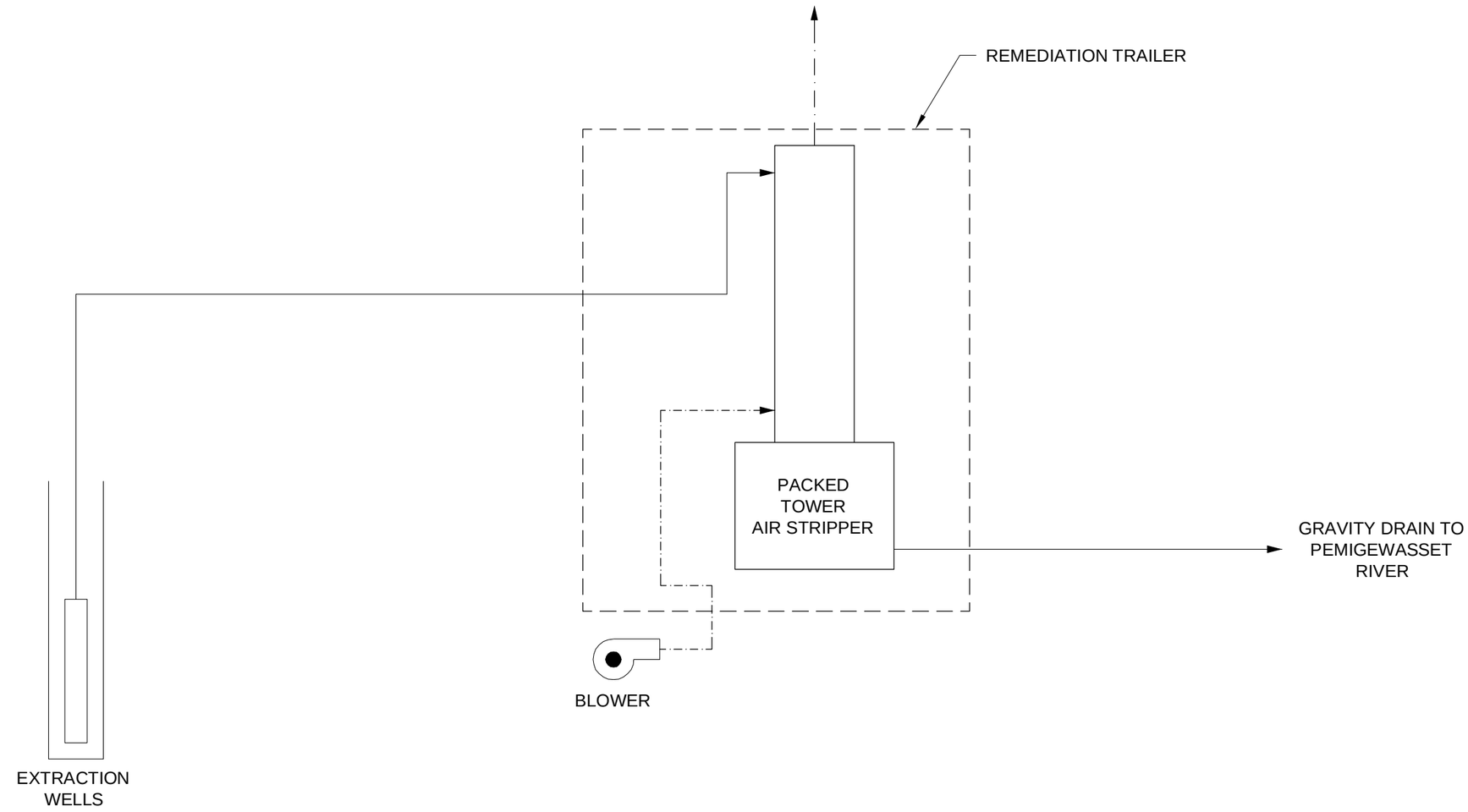
2. The data shown in this table represents the most recent available, routinely collected data (11/20/10) and last comprehensive data set (07/26/09) analyzed for compliance with the 2005 RGP. Note that data has been collected on a monthly basis for the parameters required under the 2005 RGP. Data was collected by Acme Staple Company, Inc., and analyzed by Eastern Analytical, Inc. of Concord, New Hampshire or Analytics Environmental Laboratory LLC of Portsmouth, New Hampshire. Only analytical data results corresponding to the parameters listed in Category II Sub Category A are shown on this table.

3. Analytical method and minimum level of test method are shown for test methods presented in the 2010 RGP Appendix VI. Where analytical methods other than those presented in RGP Appendix VI have been used, the reporting limit of the method is less than or equal to the minimum test level in all instances.

4. Effluent limits were obtained from the 2010 RGP Appendix VI, with the exception of copper and iron. The effluent limits for these metals are based on a calculated dilution factor and the limits presented in the 2010 RGP Appendix IV.

5. A blank indicates the sample was not analyzed for this analyte.

FIGURES



SANBORN HEAD

NOT TO SCALE

NO.	DATE	DESCRIPTION	BY

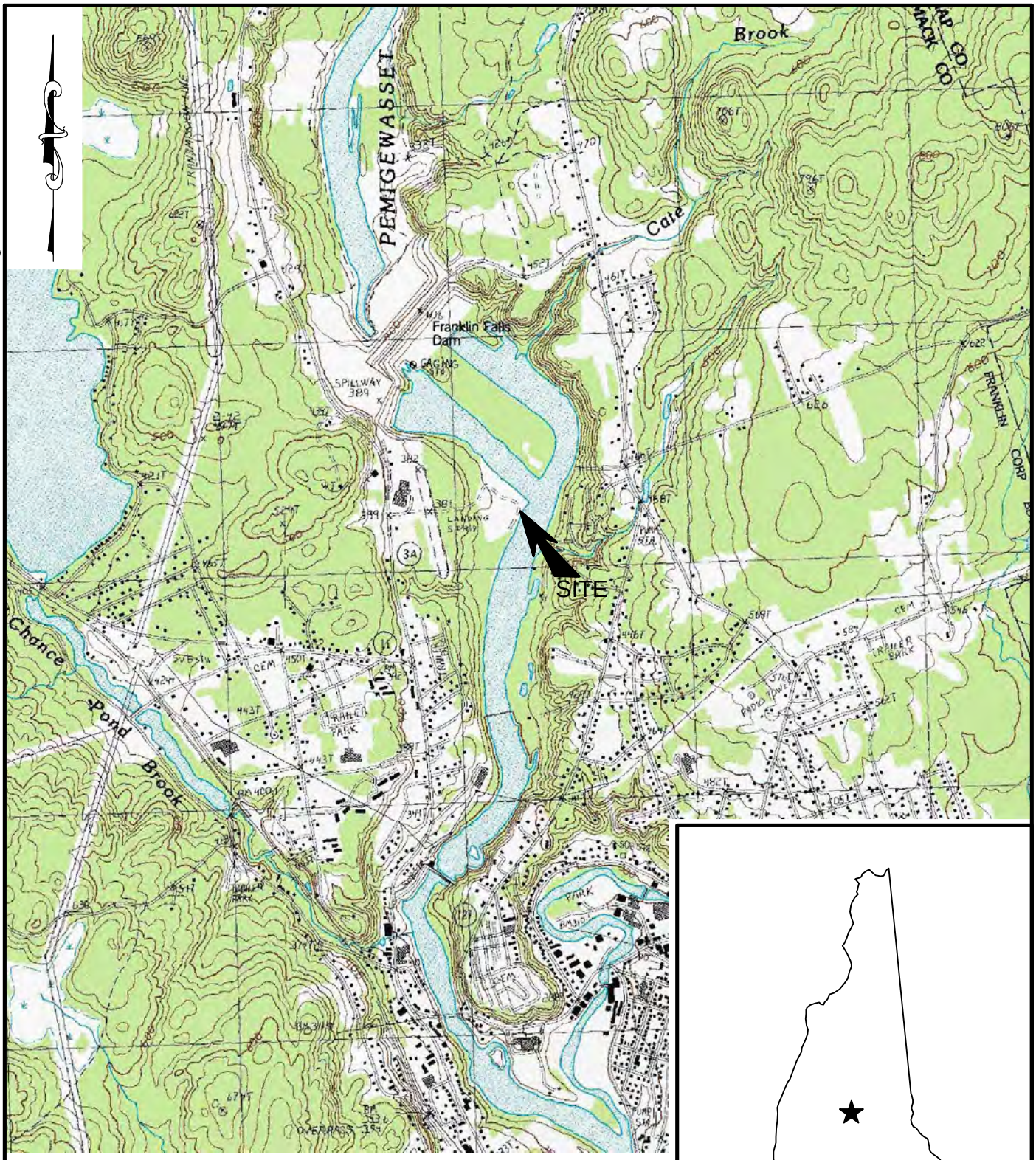
DRAWN BY: D. Dombrowsky
DESIGNED BY: M. Abberton
REVIEWED BY: A. Ashton
PROJECT MGR: P. Rydel
PIC: P. Rydel
DATE: November 2010

Remediation General Permit Renewal
Acme Staple Company
Franklin, New Hampshire

Process Flow Diagram

PROJECT NUMBER: 2584.02

FIGURE NUMBER: 1



NOTES:

BASE MAP TAKEN FROM 7.5 MINUTE USGS QUADRANGLE MAP: FRANKLIN, NEW HAMPSHIRE (1987)

Acme Staple Company Franklin, New Hampshire	Remediation General Permit Renewal Locus Plan	
SANBORN HEAD	SCALE: 1"=2000'	DRAWN BY:DJD	FILE NO. 2584.02
	DATE:Nov 2010	CHECKED BY:KEAS	FIGURE NO. 2

IMAGES: Q:\CAD Library\GIS\New Hampshire\Quads\Mr. Sids 8-19-04\drg122.sid
V:\RANDOLPH\EMW\2010 Engineering Templates\sanborn_head_spot.jpg

FILE: Q:\CONCORD\2584.02\Tasks\258402 Locus.dwg
LAYOUT: Locus
CTB FILE: SHA Standard.ctb
PLOT DATE: 11-11-10

LEGEND:

- SH, GZ, MW — CURRENT GROUNDWATER PERMIT MONITORING WELL LOCATION AND DESIGNATION
- EW — EXTRACTION WELL LOCATION AND DESIGNATION
- CITY OF WEST FRANKLIN WATER SUPPLY WELL
- 380 — GROUND SURFACE ELEVATION CONTOUR
- APPROXIMATE SITE PROPERTY LINE

NOTES:

1. THE BASE MAP WAS DRAWN FROM A PLAN PREPARED BY GZA GEOENVIRONMENTAL, INC. (GZA) OF MANCHESTER, NEW HAMPSHIRE ENTITLED, "EXPLORATION LOCATION PLAN," WHICH WAS CONTAINED IN A MAY 1993 REPORT ENTITLED, "SUPPLEMENTAL SOURCE CHARACTERIZATION EVALUATION, ACME STAPLE COMPANY, WEST FRANKLIN, NEW HAMPSHIRE."

PEMIGEWASSET RIVER

ACME STAPLE COMPANY

ROUTE 3A

CITY WATER SUPPLY WELL ACME #1

CITY WATER SUPPLY WELL ACME #2

APPROXIMATE LOCATION OF CITY OF FRANKLIN WATER TREATMENT BUILDING

APPROXIMATE LOCATION OF GROUNDWATER REMEDIATION SYSTEM ENCLOSURE

APPROXIMATE LOCATION OF GROUNDWATER REMEDIATION DISCHARGE PIPE

APPROXIMATE LOCATION OF GROUNDWATER REMEDIATION DISCHARGE PIPE OUTFALL

EW-2, 2A
GZ-101
GZ-104
EW-5, 5A
MW-1
EW-3, 3A
EW-4, 4A
GZ-105
EW-103
EW-101
SH-101L
SH-101R
EW-104
EW-102

SANBORN HEAD

GRAPHICAL SCALE
100' 50' 0 100' 200'

NO.	DATE	DESCRIPTION	BY

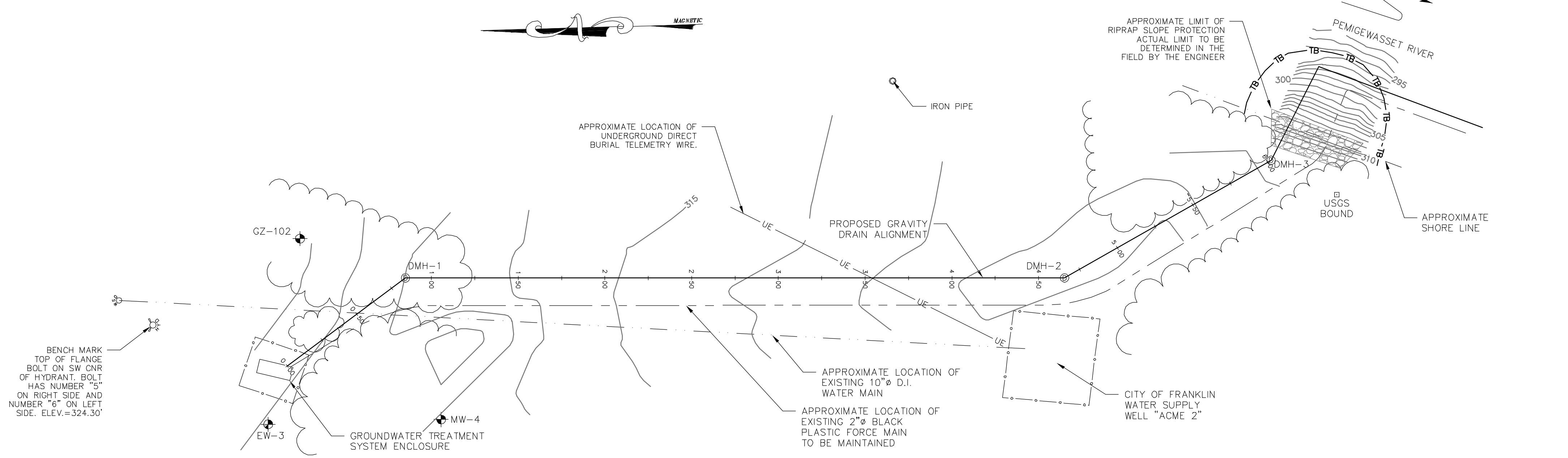
DRAWN BY: D. Dombrowsky
DESIGNED BY: K. E. Schlosser
REVIEWED BY: A. Ashton
PROJECT MGR: P. Rydel
PIC: P. Rydel
DATE: November 2010

Remediation General Permit Renewal
Acme Staple Company
Franklin, New Hampshire

Site Plan

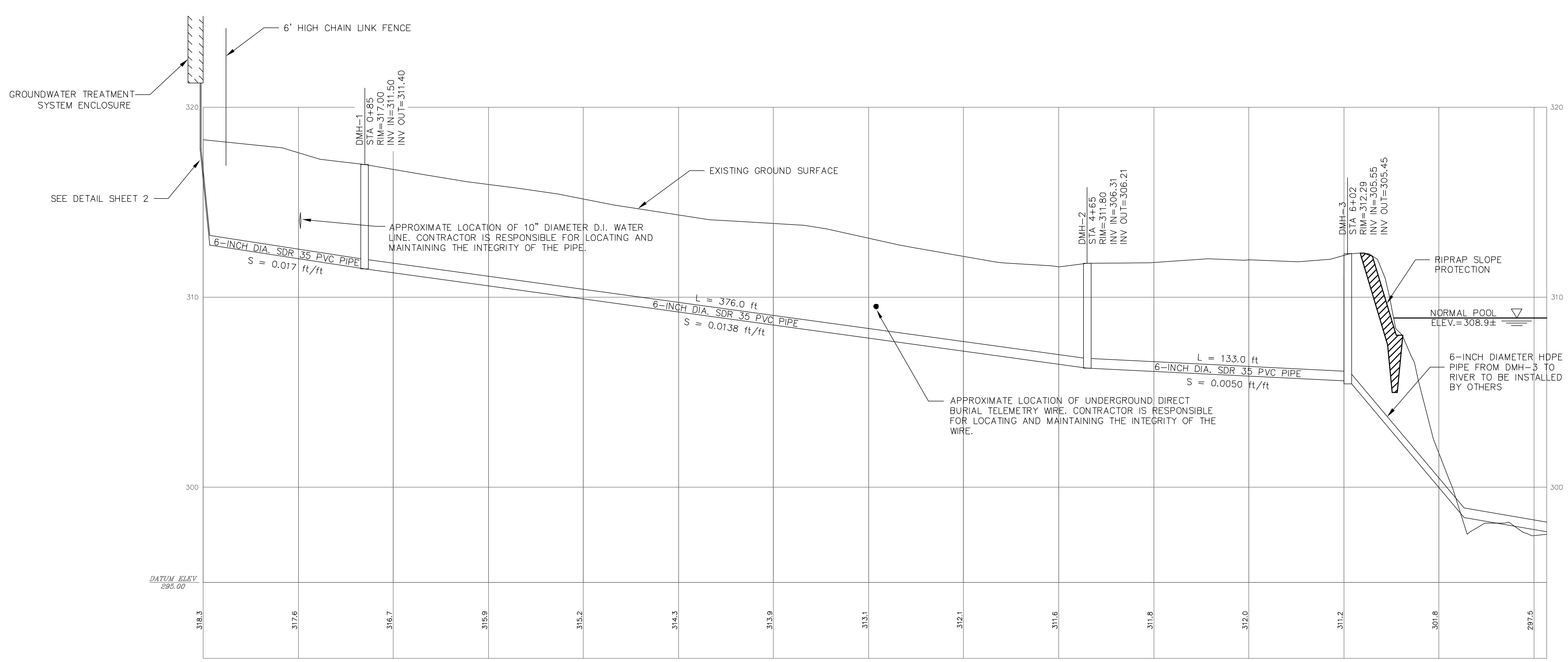
PROJECT NUMBER: 2584.02

SHEET NUMBER: 3



PLAN

SCALE: 1"=40'



PIPE PROFILE

HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=4'

NOTES:

1) TOPOGRAPHY IS BASED ON A SURVEY PERFORMED ON JUNE 30 AND JULY 4, 1994, AND SEPTEMBER 5, 1995 BY SANBORN, HEAD AND ASSOCIATES, INC. OF CONCORD, NH. DATUM WAS BASED ON TOP OF PVC RISER IN MONITORING WELL GZ-102 AT ELEV. 321.52'.

2) CONTRACTOR SHALL MAINTAIN THE EXISTING 2" DIAMETER FORCE MAIN IN OPERATING CONDITION.

3) WORK IN THE SHORELINE AREA WILL REQUIRE A WETLANDS PERMIT. WORK SHALL NOT COMMENCE UNTIL A WETLANDS PERMIT IS ACQUIRED, AND SHALL COMPLY WITH THE CONDITIONS OF THE PERMIT. WETLANDS PERMIT TO BE OBTAINED BY OTHERS.

4) CONTRACTOR TO PROVIDE AND INSTALL PIPING FROM FLANGE LOCATED TWO FEET INSIDE THE GROUNDWATER TREATMENT SYSTEM ENCLOSURE TO DMH-3. PIPE INSULATION, ELECTRICAL HEAT TRACE AND PIPE FROM DMH-3 INTO THE RIVER SHALL BE PROVIDED AND INSTALLED BY OTHERS.

5) REFER TO SHEET 2 FOR DETAILS.

LEGEND:

- 1-FOOT CONTOUR
- 305 — 5-FOOT CONTOUR
- EXISTING FORCE MAIN
- EXISTING WATER SUPPLY LINE
- CHAIN LINK FENCE
- TREE LINE
- MONITORING WELL OR EXTRACTION WELL
- FIRE HYDRANT
- VALVE BOX
- PROPOSED PIPE ALIGNMENT
- DMH-3 — PROPOSED DRAIN MANHOLE
- TB — TB — TURBIDITY BARRIER

NO.	DATE	DESCRIPTION	BY

SCALE 1 INCH = 40 FEET

SHA Sanborn, Head & Associates
Consulting Engineers & Scientists

DRAWN BY: JAC
DESIGNED BY: JAC
CHECKED BY:
REVIEWED BY:
PROJECT MGR: JAC
PIC: PMS
DATE: SEP 95

ACME STAPLE COMPANY, INC.

WEST FRANKLIN, NEW HAMPSHIRE

GROUNDWATER TREATMENT SYSTEM GRAVITY DRAIN DETAILS

PROJECT NUMBER: 1006

SHEET NUMBER: 1 OF 2

APPENDIX A

Analytical Laboratory Data

ACME
STAPLE COMPANY, INC.
ESTABLISHED IN 1894
(800) 258-3778 (603) 934-2320 FAX (603) 934-6199

August 31, 2009

Groundwater Permits Coordinator
Ref Site #198705001
Waste Management Division
N.H. Department of Environmental Services
PO Box 95
Concord, NH 03302-0095

Re: NPDES NHG 910000 Sampling
Groundwater Extraction and Treatment System
Acme Staple Company
Franklin, NH 03235

Enclosed for your information is the analytical data from the influent and effluent sampling of the groundwater extraction and treatment system at the above referenced site. This data is being forwarded to you in accordance with conditions indicated in a letter from Mr. David Tordoff, On-Scene Coordinator, Emergency Planning and Response Branch, U.S. Environmental Protection Agency, dated July 20, 1989. Analytical data from the sampling taken by Acme Staple Company on July 27 2009, did not detect the presence of volatile organic compounds in the groundwater treatment system effluent samples. This data is consistent with data obtained since the groundwater extraction and treatment system went on-line and which indicate the system continues to provide a hydraulic barrier upgradient of the City of Franklin water supply wells Acme Nos. 1 and 2.

Please call if you have any questions or comments regarding this information.

Sincerely,

Onno Boswinkel
General Manager

OB/slm
:npdes/sampling/hewitt letter
cc: Mr. Michael J. O'Brien, U.S. EPA
Mr. Paul Rydel, Sanborn, Head and Associates
Ms. Elizabeth Corrow, Franklin City Manager
Mr. Brian Sullivan, Director of Services, City of Franklin

SAMPLE CONDITIONS PAGE

Eastern Analytical, Inc. ID#: 81257

Client: Acme Staple Company, Inc. Client Designation: Acme Staple / Monthly Influent (RGP) | July 2009

Temperature upon receipt (°C): 4 Received on ice or cold packs (Yes/No): Y

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
81257.01	Influent	7/27/09	7/26/09	aqueous		Adheres to Sample Acceptance Policy
81257.02	Effluent	7/27/09	7/26/09	aqueous		Adheres to Sample Acceptance Policy
81257.03	Trip Blank - 8260B	7/27/09	7/9/09	aqueous		Adheres to Sample Acceptance Policy
81257.04	Trip Blank - 1,4 Diox.	7/27/09	7/10/09	aqueous		Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitibility, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

All results contained in this report relate only to the above listed samples.

References include:

1) EPA 600/4-79-020, 1983
2) Standard Methods for Examination of Water and Wastewater : Inorganics, 19th Edition, 1995; Microbiology, 20th Edition, 1998
3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
4) Hach Water Analysis Handbook, 2nd edition, 1992

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent	Trip Blank - 8260B
Lab Sample ID:	81257.01	81257.02	81257.03
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09	7/9/09
Date Received:	7/27/09	7/27/09	7/27/09
Units:	ug/l	ug/l	ug/l
Date of Analysis:	7/28/09	7/28/09	7/28/09
Analyst:	KJP	KJP	KJP
Method:	8260B	8260B	8260B
Dilution Factor:	1	1	1
Dichlorodifluoromethane	< 5	< 5	< 5
Chloromethane	< 2	< 2	< 2
Vinyl chloride	< 2	< 2	< 2
Bromomethane	< 2	< 2	< 2
Chloroethane	< 5	< 5	< 5
Trichlorofluoromethane	< 5	< 5	< 5
Diethyl Ether	< 5	< 5	< 5
Acetone	< 10	< 10	< 10
1,1-Dichloroethene	< 1	< 1	< 1
tert-Butyl Alcohol (TBA)	< 30	< 30	< 30
Methylene chloride	< 5	< 5	< 5
Carbon disulfide	< 5	< 5	< 5
Methyl-t-butyl ether(MTBE)	< 5	< 5	< 5
Ethyl-t-butyl ether(ETBE)	< 5	< 5	< 5
Isopropyl ether(DIPE)	< 5	< 5	< 5
tert-amyl methyl ether(TAME)	< 5	< 5	< 5
trans-1,2-Dichloroethene	< 2	< 2	< 2
1,1-Dichloroethane	< 2	< 2	< 2
2,2-Dichloropropane	< 2	< 2	< 2
cis-1,2-Dichloroethene	< 2	< 2	< 2
2-Butanone(MEK)	< 10	< 10	< 10
Bromochloromethane	< 2	< 2	< 2
Tetrahydrofuran(THF)	< 10	< 10	< 10
Chloroform	2	< 2	< 2
1,1,1-Trichloroethane	< 2	< 2	< 2
Carbon tetrachloride	< 2	< 2	< 2
1,1-Dichloropropene	< 2	< 2	< 2
Benzene	< 1	< 1	< 1
1,2-Dichloroethane	< 2	< 2	< 2
Trichloroethene	< 2	< 2	< 2
1,2-Dichloropropane	< 2	< 2	< 2
Dibromomethane	< 2	< 2	< 2
Bromodichloromethane	< 0.5	< 0.5	< 0.5
4-Methyl-2-pentanone(MIBK)	< 10	< 10	< 10
cis-1,3-Dichloropropene	< 2	< 2	< 2
Toluene	< 1	< 1	< 1
trans-1,3-Dichloropropene	< 2	< 2	< 2
1,1,2-Trichloroethane	< 2	< 2	< 2
2-Hexanone	< 10	< 10	< 10
Tetrachloroethene	< 2	< 2	< 2
1,3-Dichloropropane	< 2	< 2	< 2
Dibromochloromethane	< 2	< 2	< 2
1,2-Dibromoethane(EDB)	< 2	< 2	< 2
Chlorobenzene	< 2	< 2	< 2
1,1,1,2-Tetrachloroethane	< 2	< 2	< 2
Ethylbenzene	< 1	< 1	< 1

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent	Trip Blank - 8260B
Lab Sample ID:	81257.01	81257.02	81257.03
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09	7/9/09
Date Received:	7/27/09	7/27/09	7/27/09
Units:	ug/l	ug/l	ug/l
Date of Analysis:	7/28/09	7/28/09	7/28/09
Analyst:	KJP	KJP	KJP
Method:	8260B	8260B	8260B
Dilution Factor:	1	1	1
mp-Xylene	< 1	< 1	< 1
o-Xylene	< 1	< 1	< 1
Styrene	< 1	< 1	< 1
Bromoform	< 2	< 2	< 2
IsoPropylbenzene	< 1	< 1	< 1
Bromobenzene	< 2	< 2	< 2
1,1,2,2-Tetrachloroethane	< 2	< 2	< 2
1,2,3-Trichloropropane	< 2	< 2	< 2
n-Propylbenzene	< 1	< 1	< 1
2-Chlorotoluene	< 2	< 2	< 2
4-Chlorotoluene	< 2	< 2	< 2
1,3,5-Trimethylbenzene	< 1	< 1	< 1
tert-Butylbenzene	< 1	< 1	< 1
1,2,4-Trimethylbenzene	< 1	< 1	< 1
sec-Butylbenzene	< 1	< 1	< 1
1,3-Dichlorobenzene	< 1	< 1	< 1
p-Isopropyltoluene	< 1	< 1	< 1
1,4-Dichlorobenzene	< 1	< 1	< 1
1,2-Dichlorobenzene	< 1	< 1	< 1
n-Butylbenzene	< 1	< 1	< 1
1,2-Dibromo-3-chloropropane	< 2	< 2	< 2
1,3,5-Trichlorobenzene	< 1	< 1	< 1
1,2,4-Trichlorobenzene	< 1	< 1	< 1
Hexachlorobutadiene	< 0.5	< 0.5	< 0.5
Naphthalene	< 5	< 5	< 5
1,2,3-Trichlorobenzene	< 1	< 1	< 1
4-Bromofluorobenzene (surr)	96 %R	97 %R	94 %R
1,2-Dichlorobenzene-d4 (surr)	102 %R	107 %R	104 %R
Toluene-d8 (surr)	99 %R	98 %R	98 %R

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent	Trip Blank - 1,4 Diox.
Lab Sample ID:	81257.01	81257.02	81257.04
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09	7/10/09
Date Received:	7/27/09	7/27/09	7/27/09
Units:	ug/l	ug/l	ug/l
Date of Analysis:	7/27/09	7/27/09	7/27/09
Analyst:	VG	VG	VG
Method:	8260B SIM	8260B SIM	8260B SIM
Dilution Factor:	1	1	1
1,4-Dioxane	< 1	< 1	< 1
4-Bromofluorobenzene (surr)	115 %R	116 %R	115 %R
Toluene-d8 (surr)	117 %R	118 %R	116 %R

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent
Lab Sample ID:	81257.01	81257.02
Matrix:	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09
Date Received:	7/27/09	7/27/09
Units:	ug/l	ug/l
Date of Extraction/Preparation	7/28/09	7/28/09
Date of Analysis:	7/28/09	7/28/09
Analyst:	JMR	JMR
Method:	625mod	625mod
Dilution Factor:	1	1
Phenol	< 1	< 1
2-Chlorophenol	< 1	< 1
2,4-Dichlorophenol	< 1	< 1
2,4,5-Trichlorophenol	< 1	< 1
2,4,6-Trichlorophenol	< 1	< 1
Pentachlorophenol	< 5	< 5
2-Nitrophenol	< 1	< 1
4-Nitrophenol	< 5	< 5
2,4-Dinitrophenol	< 5	< 5
2-Methylphenol	< 1	< 1
3/4-Methylphenol	< 1	< 1
2,4-Dimethylphenol	< 1	< 1
4-Chloro-3-methylphenol	< 1	< 1
4,6-Dinitro-2-methylphenol	< 5	< 5
Benzoic Acid	< 5	< 5
N-Nitrosodimethylamine	< 1	< 1
n-Nitroso-di-n-propylamine	< 1	< 1
n-Nitrosodiphenylamine	< 1	< 1
bis(2-Chloroethyl)ether	< 1	< 1
bis(2-chloroisopropyl)ether	< 1	< 1
bis(2-Chloroethoxy)methane	< 1	< 1
1,3-Dichlorobenzene	< 1	< 1
1,4-Dichlorobenzene	< 1	< 1
1,2-Dichlorobenzene	< 1	< 1
1,2,4-Trichlorobenzene	< 1	< 1
2-Chloronaphthalene	< 1	< 1
4-Chlorophenyl-phenylether	< 1	< 1
4-Bromophenyl-phenylether	< 1	< 1
Hexachloroethane	< 1	< 1
Hexachlorobutadiene	< 1	< 1
Hexachlorocyclopentadiene	< 5	< 5
Hexachlorobenzene	< 1	< 1
4-Chloroaniline	< 1	< 1
2-Nitroaniline	< 5	< 5
3-Nitroaniline	< 1	< 1
4-Nitroaniline	< 1	< 1
Benzyl alcohol	< 1	< 1
Nitrobenzene	< 1	< 1
Isophorone	< 1	< 1
2,4-Dinitrotoluene	< 1	< 1
2,6-Dinitrotoluene	< 1	< 1
Benzidine (estimated)	< 5	< 5
3,3'-Dichlorobenzidine	< 1	< 1
Pyridine	< 5	< 5
Azobenzene	< 1	< 1

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent
Lab Sample ID:	81257.01	81257.02
Matrix:	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09
Date Received:	7/27/09	7/27/09
Units:	ug/l	ug/l
Date of Extraction/Preparation	7/28/09	7/28/09
Date of Analysis:	7/28/09	7/28/09
Analyst:	JMR	JMR
Method:	625mod	625mod
Dilution Factor:	1	1
Carbazole	< 1	< 1
Dimethylphthalate	< 1	< 1
Diethylphthalate	< 1	< 1
Di-n-butylphthalate	< 5	< 5
Butylbenzylphthalate	< 1	< 1
bis(2-Ethylhexyl)phthalate	< 5	< 5
Di-n-octylphthalate	< 1	< 1
Dibenzofuran	< 1	< 1
Naphthalene	< 1	< 1
2-Methylnaphthalene	< 1	< 1
Acenaphthylene	< 1	< 1
Acenaphthene	< 1	< 1
Fluorene	< 1	< 1
Phenanthrene	< 1	< 1
Anthracene	< 1	< 1
Fluoranthene	< 1	< 1
Pyrene	< 1	< 1
Benzo[a]anthracene	< 1	< 1
Chrysene	< 1	< 1
Benzo[b]fluoranthene	< 1	< 1
Benzo[k]fluoranthene	< 1	< 1
Benzo[a]pyrene	< 1	< 1
Indeno[1,2,3-cd]pyrene	< 1	< 1
Dibenz[a,h]anthracene	< 1	< 1
Benzo[g,h,i]perylene	< 1	< 1
2-Fluorophenol (surr)	**44 %R**	**42 %R**
Phenol-d6 (surr)	**27 %R**	**25 %R**
2,4,6-Tribromophenol (surr)	68 %R	68 %R
Nitrobenzene-D5 (surr)	**69 %R**	**67 %R**
2-Fluorobiphenyl (surr)	**74 %R**	**71 %R**
p-Terphenyl-D14 (surr)	**87 %R**	**83 %R**

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent					
Lab Sample ID:	81257.01	81257.02					
Matrix:	aqueous	aqueous					
Date Sampled:	7/26/09	7/26/09		**Analysis**			
Date Received:	7/27/09	7/27/09	**Units**	**Date**	**Time**	**Method**	**Analyst**
TPH(SGTHEM)	< 5	< 5	mg/L	7/30/09	10:20	1664A	JLL

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent
Lab Sample ID:	81257.01	81257.02
Matrix:	aqueous	aqueous
Date Sampled:	7/26/09	7/26/09
Date Received:	7/27/09	7/27/09
% Solid:		
Units:	ug/l	ug/l
Date of Extraction/Prep:	7/30/09	7/30/09
Date of Analysis:	7/31/09	7/31/09
Analyst:	JW	JW
Extraction Method:	608/3510C	608/3510C
Analysis Method:	608	608
Dilution Factor:	1	1
PCB-1016	< 0.5	< 0.5
PCB-1221	< 0.5	< 0.5
PCB-1232	< 0.5	< 0.5
PCB-1242	< 0.5	< 0.5
PCB-1248	< 0.5	< 0.5
PCB-1254	< 0.5	< 0.5
PCB-1260	< 0.5	< 0.5
TMX (surr)	**84 %R**	**89 %R**
DCB (surr)	**85 %R**	**91 %R**

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent						
Lab Sample ID:	81257.01	81257.02						
Matrix:	aqueous	aqueous						
Date Sampled:	7/26/09	7/26/09		Analysis				
Date Received:	7/27/09	7/27/09	**Units**	**Date**	**Time**	**Method**	**Analyst**	
Solids Suspended	< 5	< 5	mg/L	7/30/09	6:15	2540D	KJV	

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 81257

Client: **Acme Staple Company, Inc.** Client Designation: **Acme Staple / Monthly Influent (RGP) | July 2009**

Sample ID:	Influent	Effluent	Analytical Matrix	Units	Date of Analysis	Method	Analyst
Lab Sample ID:	81257.01	81257.02					
Matrix:	aqueous	aqueous					
Date Sampled:	7/26/09	7/26/09					
Date Received:	7/27/09	7/27/09					
Copper	**0.003**	**0.002**	AqTot	mg/L	8/3/09	200.8	DS
Nickel	< 0.001	**0.001**	AqTot	mg/L	8/3/09	200.8	DS

analytics environmental laboratory LLC

195 Commerce Way
Portsmouth, New Hampshire 03801
603-436-5111 Fax 603-430-2151
800-929-9906

Ms. Pam Gagnon
Eastern Analytical, Inc.
25 Chenell Drive
Concord, NH 03301

August 4, 2009

CLIENT SAMPLE ID

Project Name:
Project Number: 81257
Client Sample ID: Influent

SAMPLE DATA

Lab Sample ID: 64408-1
Matrix: Aqueous
Percent Solid: N/A
Dilution Factor: 1
Collection Date: 07/26/09
Lab Receipt Date: 07/28/09
Extraction Date: 07/31/09
Analysis Date: 08/03/09

ANALYTICAL RESULTS CHLORINATED HERBICIDES

COMPOUND	Quantitation Limit µg/L	Results µg/L
Pentachlorophenol	0.25	U

Surrogate Standard Recovery

2,4-Dichlorophenylacetic acid 78 %

U=Undetected J=Estimated E=Exceeds Calibration Range B=Detected in

METHODOLOGY: Samples were analyzed according to Test Methods for Evaluating Solid Waste, SW-846 Method 8151.

COMMENTS:

Authorized signature

eastern analytical, inc.
professional laboratory services

Paul Johnson
Acme Staple Company, Inc.
87 Hill Road
West Franklin , NH 03235

Subject: Laboratory Report

Eastern Analytical, Inc. ID: 94972
Client Identification: ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 -
Date Received: 11/22/2010

Dear Mr. Johnson:

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.eailabs.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:
Solid samples are reported on a dry weight basis, unless otherwise noted
< : "less than" followed by the reporting limit
> : "greater than" followed by the reporting limit
%R : % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269) and Vermont (VT1012).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample(s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

Lorraine Olashaw
Lorraine Olashaw, Lab Director

12.9.10
Date

7
# of pages (excluding cover letter)

SAMPLE CONDITIONS PAGE

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Temperature upon receipt (°C): 3.6 **Received on ice or cold packs (Yes/No): Y**

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
94972.01	Influent	11/22/10	11/20/10	aqueous		Adheres to Sample Acceptance Policy
94972.02	Effluent	11/22/10	11/20/10	aqueous		Adheres to Sample Acceptance Policy
94972.03	Trip Blank - 8260B	11/22/10	10/28/10	aqueous		Adheres to Sample Acceptance Policy
94972.04	Trip Blank - 1,4 Diox.	11/22/10	10/29/10	aqueous		Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitibility, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

All results contained in this report relate only to the above listed samples.

References include:

1) EPA 600/4-79-020, 1983
2) Standard Methods for Examination of Water and Wastewater : Inorganics, 19th Edition, 1995; Microbiology, 20th Edition, 1998
3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
4) Hach Water Analysis Handbook, 2nd edition, 1992

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Sample ID:	Influent	Effluent	Trip Blank - 8260B
Lab Sample ID:	94972.01	94972.02	94972.03
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	11/20/10	11/20/10	10/28/10
Date Received:	11/22/10	11/22/10	11/22/10
Units:	ug/l	ug/l	ug/l
Date of Analysis:	11/23/10	11/23/10	11/23/10
Analyst:	KJP	KJP	KJP
Method:	8260B	8260B	8260B
Dilution Factor:	1	1	1
Dichlorodifluoromethane	< 5	< 5	< 5
Chloromethane	< 2	< 2	< 2
Vinyl chloride	< 2	< 2	< 2
Bromomethane	< 2	< 2	< 2
Chloroethane	< 5	< 5	< 5
Trichlorofluoromethane	< 5	< 5	< 5
Diethyl Ether	< 5	< 5	< 5
Acetone	< 10	< 10	< 10
1,1-Dichloroethene	< 1	< 1	< 1
tert-Butyl Alcohol (TBA)	< 30	< 30	< 30
Methylene chloride	< 5	< 5	< 5
Carbon disulfide	< 5	< 5	< 5
Methyl-t-butyl ether(MTBE)	< 5	< 5	< 5
Ethyl-t-butyl ether(ETBE)	< 5	< 5	< 5
Isopropyl ether(DIPE)	< 5	< 5	< 5
tert-amyl methyl ether(TAME)	< 5	< 5	< 5
trans-1,2-Dichloroethene	< 2	< 2	< 2
1,1-Dichloroethane	< 2	< 2	< 2
2,2-Dichloropropane	< 2	< 2	< 2
cis-1,2-Dichloroethene	< 2	< 2	< 2
2-Butanone(MEK)	< 10	< 10	< 10
Bromochloromethane	< 2	< 2	< 2
Tetrahydrofuran(THF)	< 10	< 10	< 10
Chloroform	**3**	< 2	< 2
1,1,1-Trichloroethane	< 2	< 2	< 2
Carbon tetrachloride	< 2	< 2	< 2
1,1-Dichloropropene	< 2	< 2	< 2
Benzene	< 1	< 1	< 1
1,2-Dichloroethane	< 2	< 2	< 2
Trichloroethene	< 2	< 2	< 2
1,2-Dichloropropane	< 2	< 2	< 2
Dibromomethane	< 2	< 2	< 2
Bromodichloromethane	< 0.5	< 0.5	< 0.5
1,4-Dioxane	< 50	< 50	< 50
4-Methyl-2-pentanone(MIBK)	< 10	< 10	< 10
cis-1,3-Dichloropropene	< 2	< 2	< 2
Toluene	< 1	< 1	< 1
trans-1,3-Dichloropropene	< 2	< 2	< 2
1,1,2-Trichloroethane	< 2	< 2	< 2
2-Hexanone	< 10	< 10	< 10
Tetrachloroethene	< 2	< 2	< 2
1,3-Dichloropropane	< 2	< 2	< 2
Dibromochloromethane	< 2	< 2	< 2
1,2-Dibromoethane(EDB)	< 2	< 2	< 2
Chlorobenzene	< 2	< 2	< 2
1,1,1,2-Tetrachloroethane	< 2	< 2	< 2

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Sample ID:	Influent	Effluent	Trip Blank - 8260B
Lab Sample ID:	94972.01	94972.02	94972.03
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	11/20/10	11/20/10	10/28/10
Date Received:	11/22/10	11/22/10	11/22/10
Units:	ug/l	ug/l	ug/l
Date of Analysis:	11/23/10	11/23/10	11/23/10
Analyst:	KJP	KJP	KJP
Method:	8260B	8260B	8260B
Dilution Factor:	1	1	1
Ethylbenzene	< 1	< 1	< 1
mp-Xylene	< 1	< 1	< 1
o-Xylene	< 1	< 1	< 1
Styrene	< 1	< 1	< 1
Bromoform	< 2	< 2	< 2
IsoPropylbenzene	< 1	< 1	< 1
Bromobenzene	< 2	< 2	< 2
1,1,2,2-Tetrachloroethane	< 2	< 2	< 2
1,2,3-Trichloropropane	< 2	< 2	< 2
n-Propylbenzene	< 1	< 1	< 1
2-Chlorotoluene	< 2	< 2	< 2
4-Chlorotoluene	< 2	< 2	< 2
1,3,5-Trimethylbenzene	< 1	< 1	< 1
tert-Butylbenzene	< 1	< 1	< 1
1,2,4-Trimethylbenzene	< 1	< 1	< 1
sec-Butylbenzene	< 1	< 1	< 1
1,3-Dichlorobenzene	< 1	< 1	< 1
p-Isopropyltoluene	< 1	< 1	< 1
1,4-Dichlorobenzene	< 1	< 1	< 1
1,2-Dichlorobenzene	< 1	< 1	< 1
n-Butylbenzene	< 1	< 1	< 1
1,2-Dibromo-3-chloropropane	< 2	< 2	< 2
1,3,5-Trichlorobenzene	< 1	< 1	< 1
1,2,4-Trichlorobenzene	< 1	< 1	< 1
Hexachlorobutadiene	< 0.5	< 0.5	< 0.5
Naphthalene	< 5	< 5	< 5
1,2,3-Trichlorobenzene	< 1	< 1	< 1
4-Bromofluorobenzene (surr)	**97 %R**	**98 %R**	**94 %R**
1,2-Dichlorobenzene-d4 (surr)	**99 %R**	**114 %R**	**111 %R**
Toluene-d8 (surr)	**101 %R**	**96 %R**	**91 %R**

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Sample ID:	Influent	Effluent	Trip Blank - 1,4 Diox.
Lab Sample ID:	94972.01	94972.02	94972.04
Matrix:	aqueous	aqueous	aqueous
Date Sampled:	11/20/10	11/20/10	10/29/10
Date Received:	11/22/10	11/22/10	11/22/10
Units:	ug/l	ug/l	ug/l
Date of Analysis:	11/30/10	11/30/10	11/30/10
Analyst:	VG	VG	VG
Method:	8260B SIM	8260B SIM	8260B SIM
Dilution Factor:	1	1	1
1,4-Dioxane	< 1	< 1	< 1
4-Bromofluorobenzene (surr)	**123 %R**	**113 %R**	**111 %R**
Toluene-d8 (surr)	**105 %R**	**106 %R**	**103 %R**

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Sample ID:	Influent	Effluent					
Lab Sample ID:	94972.01	94972.02					
Matrix:	aqueous	aqueous					
Date Sampled:	11/20/10	11/20/10					
Date Received:	11/22/10	11/22/10					
				Analysis			
			Units	**Date**	**Time**	**Method**	**Analyst**
Solids Suspended	< 5	< 5	mg/L	11/23/10	16:30	2540D	KJR

LABORATORY REPORT

Eastern Analytical, Inc. ID#: 94972

Client: **Acme Staple Company, Inc.** Client Designation: **ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov. 2010**

Sample ID:	Influent	Effluent					
Lab Sample ID:	94972.01	94972.02					
Matrix:	aqueous	aqueous					
Date Sampled:	11/20/10	11/20/10					
Date Received:	11/22/10	11/22/10					
			Analytical Matrix	**Units**	**Date of Analysis**	**Method**	**Analyst**
Copper	**0.002**	< 0.001	AqTot	mg/L	11/23/10	200.8	DS
Iron	< 0.05	< 0.05	AqTot	mg/L	11/23/10	200.8	DS
Nickel	< 0.001	< 0.001	AqTot	mg/L	11/23/10	200.8	DS

CHAIN-OF-CUSTODY RECORD

eastern analytical, inc.
professional laboratory services

94972

Sample IDs	Date/Time (Composites need start and stop dates/times)	Matrix	Parameters and Sample Notes	# of containers
Influent	11-20-10 12:30 PM	aqueous Grab or Comp	AqTot/VNH8260BFullList/ICPMets-Cu-Ni/TSS/V8260SIM14DIOXANE ↓ FE	6
☒ Sampler confirms ID and parameters are accurate			*Circle preservative/s:* HCL HNO$_3$ H$_2$SO$_4$ NaOH MEOH Na$_2$S$_2$O$_3$ ICE	Dissolved Sample Field Filtered ☐
Effluent	11-20-10 12:45 PM	aqueous Grab or Comp	AqTot/VNH8260BFullList/ICPMets-Cu-Ni/TSS/V8260SIM14DIOXANE ↓ FE	6
☒ Sampler confirms ID and parameters are accurate			*Circle preservative/s:* HCL HNO$_3$ H$_2$SO$_4$ NaOH MEOH Na$_2$S$_2$O$_3$ ICE	Dissolved Sample Field Filtered ☐
Trip Blank - 8260B	Provided BY EAI	aqueous Grab or Comp	AqTot/VNH8260BFullList	2
☐ Sampler confirms ID and parameters are accurate			*Circle preservative/s:* HCL HNO$_3$ H$_2$SO$_4$ NaOH MEOH Na$_2$S$_2$O$_3$ ICE	Dissolved Sample Field Filtered ☐
Trip Blank - 1,4 Diox.	Provided BY EAI	aqueous Grab or Comp	AqTot/V8260SIM14DIOXANE	2
☐ Sampler confirms ID and parameters are accurate			*Circle preservative/s:* HCL HNO$_3$ H$_2$SO$_4$ NaOH MEOH Na$_2$S$_2$O$_3$ ICE	Dissolved Sample Field Filtered ☐

Totalizer — 0147593.8

pH Inf. 6.9 10°C

Eff. 7.1 10.3°C

Please ensure this auto COC is accurate, adheres to permit or sampling requirements for this sampling event, and modify as necessary.

EAI Project ID 319

Project Name ACME Staple Monthly RGP Influent & Effluent Monitoring NHG910000 - Nov.

State NH

Client (Pro Mgr) Paul Johnson

Customer Acme Staple Company, Inc.

Address 87 Hill Road

City West Franklin NH 03235

Phone 934-2320 Fax 934-6199

EmailAddress: paulJ@acmestaple.com

Results Needed by: Preferred date Normal

Notes about project: (i.e. Special Limits, Billing info if different...)

* Annual 1-4 Dioxane Test - (not done in July)
* once-only test for FE-mets.

QC deliverables

☒ A ☐ A+ ☐ B ☐ B+ ☐ C ☐ PC

ReportingOptions

☒ HC
☐ EDD PDF
☒ EDD email
☐ PDF prelim, NO FAX
☐ e-mail Login Confirmation
☐ NO FAX

PONumber: Verbal

Quote No:

Temperature 3.6 °C

Ice present Yes ☒ No ☐

Samples Collected by:

Relinquished by	Date/Time	Received by
	11/22/10 9:51	
	11-22-10 13:30	

Relinquished by Date/Time Received by

APPENDIX B

ESA and NHPA Eligibility

SANBORN HEAD
Building Trust. Engineering Success.

MEMORANDUM

To: File

From: Andrew E. Ashton

File: 2584.02

Date: November 11, 2010

Re: ESA and NHPA Eligibility
Acme Staple Company, Inc.

ENDANGERED SPECIES EVALUATION DOCUMENTATION

As outlined in Appendix VII of the 2010 Remediation General Permit (RGP), facilities seeking coverage under the 2010 RGP must assess the impacts of their discharges and discharge-related activities on federally-listed endangered and threatened species and designated critical habitat. The RGP requires an applicant to determine whether: (i) there any endangered species or critical habitat in your county; and (ii) there any endangered species or critical habitat in proximity to your facility or discharge location.

Assessment

The following describes the results of the assessment procedures to determine RGP 2010 eligibility for Acme Staple Company, Inc.

Appendix VII of the RGP identifies four species of concern for applicants applying for permit coverage including: the dwarf wedgemussel, the shortnose sturgeon, the bog turtle, and the northern redbelly cooter; none of which is found in the receiving waterbody.

Appendix II of the RGP indicates that there is no federally-designated Critical Habitat in New Hampshire. The United States Fish & Wildlife Service (US FWS) Critical Habitat Mapper[1] shows that there are currently no critical habitats listed in New Hampshire (see attached figure).

The US FWS website[2] reports endangered and threatened species by county. The report for Merrimack County, New Hampshire, as of November 11, 2010, lists the following:

- Arctic Peregrine Falcon (Group – Birds, Status – Recovery); and
- Small Whorled Pogonia (Group – Flowering Plants, Status – Threatened).

[1] http://criticalhabitat.fws.gov/
[2] http://ecos.fws.gov/tess_public/countySearch!speciesByCountyReport.action?fips=33013

The Arctic Peregrine Falcon is in recovery status, and not "endangered" or "threatened".

Appendix II of the 2010 RGP states that the Small Whorled Pogonia is believed to occur in forests in the towns of Danbury, Epsom, Warner, and Allenstown, thus not in proximity to the site.

Conclusion

Based on the foregoing information, the facility surface water discharge is not expected to adversely affect federally-listed endangered or threatened species and will not result in the adverse modification or destruction federally-designated critical habitat. **Thus, the facility is eligible for coverage pursuant to Criterion A of Appendix VII of the 2010 RGP: *"No endangered or threatened species or their designated critical habitat are likely to occur in proximity to the storm water discharges or discharge related activities."***

NATIONAL HISTORIC PRESERVATION ACT DOCUMENTATION

As outlined in Appendix VII of the 2010 RGP, facilities seeking coverage under this permit must comply with applicable State, Tribal and local laws concerning the protection of historic properties and places by demonstrate compliance with applicable criteria. The RGP states that "for existing dischargers whose water treatment systems do not require construction activities (e.g., the treatment system is contained in a trailer), a simple visual inspection and a review of electronic listings of National and State Registers of Historic Places is considered sufficient to determine whether historic properties are potentially affected."

Assessment

Based on our knowledge of the site, there are no known historic places that might be impacted by the facility discharge.

Further, the National Register of Historic Places (as of July 2010) shows that there are currently no listed properties or sites in the Town of Franklin, New Hampshire.[3]

A review of the electronic listings of National and State Registers of Historic Places[4] maintained by the New Hampshire Division of Historical Resources indicates two listed sites in the Town of Franklin, New Hampshire:

- the Sulphite Railroad Bridge located off US Route 3 over the Winnipesaukee River, and
- the Franklin Falls Historic District bounded by Bow, River, School, and Aylers Street and the Winnipesaukee River.

Neither of these properties is affected by the existing discharge located at the facility.

[3] http://www.nps.gov/nr/
[4] http://www.nh.gov/nhdhr/

Conclusion

Based on information obtained from the New Hampshire Division of Historical Resources and a visual inspection of the site, the facility surface water discharge is not expected to adversely affect historic properties. **Thus, the facility is eligible for coverage pursuant to Criterion 1 of Appendix VII of the 2010 RGP:** ***"The project does not involve new construction or the demolition or rehabilitation of existing buildings or other structures or facilities and historic properties are not affected by the discharge or identified in the path of the discharges regulated by this permit."***

AEA/KEAS/PLR: aea/keas

Encl. Critical Habitat Mapper Figure
US F&W Species Report
Federal Register of Historic Places
State Register of Historic Places

S:\CONDATA\2500s\2584.02\Work\2010 RPG\PDF\Attachment B\ESA NHPA Eligibility.docx

Critical Habitat Mapper

Acme Staple Co. Site, Franklin, NH

Group	Name	Population	Status	Lead Office	Recovery Plan Name	Recovery Plan Stage
Birds	Arctic peregrine Falcon (Falco		Recovery			
Flowering Plants	Small whorled pogonia (Isotria		Threatened	New England Ecological	Small Whorled Pogonia	Final Revision 1

City	Property name	Address	Listed Date	District or Area
Farmington	Farmington Town Pound	NW side of Pound Rd. 300 ft. north of the jct. of Ten Rod Rd.	19930902	
Fitzwilliam	Third Fitzwilliam Meetinghouse	Village Green	19770826	
Fitzwilliam	Old Patch Place	W of Fitzwilliam on Rhododendron Rd.	19800815	
Fitzwilliam	Fitzwilliam Common Historic District	Jct. of NH 119, Richmond Rd., and Templeton Hwy.	19970502	
Francestown	Old County Road South Historic District	S of Francestown off NH 186	19800515	
Francestown	Francestown Meetinghouse	Rte 136	19990614	
Francetown	Woodbury, Levi, Homestead	1 Main St.	20070315	
Franconia	Frost Place	S of Franconia off NH 116 on Ridge Rd.	19761130	
Franconia	Lovett's by Lafayette Brook	S of Franconia on Profile Rd.	19820311	
Franconia	Dow Academy	Dow Ave.	19820831	
Franconia	Greenleaf, Abbie, Library	439 Main St.	20030613	
Franklin	Sulphite Railroad Bridge	Off US 3 over Winnipesaukee River	19750611	
Franklin	Franklin Falls Historic District	Roughly bounded by Bow, River, School, Aylers Sts. and Winnipesaukee River	19820819	
Fremont	Fremont Meeting House	464 Main St.	19930527	
Gilford	Morrill, John J., Store	Belknap Mountain Rd.	19800829	
Gilford	Kimball Castle	Locke's Hill Rd.	19820816	
Gilford	District No. 9 Schoolhouse	358 Hoyt Rd.	20000315	
Gilford	Rowe, Benjamin, House	88 Belknap Mountain Rd.	20080430	
Gilmanton	Gilmanton Academy	Province Rd.	19830908	
Gilmanton	Centre Congregational Church	Province Rd.	19830908	
Gilmanton	Gilmanton Iron Works Library	Elm St.	19890316	
Gilmanton	First Baptist Church of Gilmanton	Province Rd./NH 107, .25 mi. N of Stage Rd.	19891201	
Gilmanton	Smith Meeting House	Jct. of Smith Meetinghouse, Parsonage Hill, and Joe Jones Rds.	19980323	
Gilsum	Gilsum Stone Arch Bridge	Surry Rd. over the Ashuelot River W of jct. NH 10	19890831	

Town Name	Address	Property Name	Property ID	SR Listing Date
Candia				
	194 High Street	Smyth Library	CND0005	4/30/2007
Charlestown				
	Acworth Road	District No. 8 Schoolhouse	CHA0010	7/29/02
Chesterfield				
	Brook and Main Streets	Citizen's Hall	CHS0006	07/26/2001
Colebrook				
	Aldrich Road	Benjamin Aldrich Homestead	COL0020	10/28/2002
Concord				
	16 Penacook Street	Rolfe Homestead	CON0256	10/31/2005
	21 Mountain Road	Bridges House	CON0148	7/25/2005
	61 Mountain Road	Emery's Tavern	CON0147	7/26/2004
	84 District #5 Road	Rossview Farm	CON0145	4/25/2005
Danville				
	Route 111A, across from Sandown Road	Webster Stage Coach Stop and Store	DAN0005	7/31/06
Deerfield				
	Stage Road	Pawtuckaway CCC Camp Recreation Hall	DEE0002	5/1/2006
Derry				
	29 Windham Depot Road	Moore-Scott House	DER0174	10/27/2003
	52 Hampstead Rd	Upper Village Hall	DER0182	10/27/08
Dunbarton				
	346 Stark Highway North	Molly Stark House/Capt. Caleb Page Hous	DUN0001	1/27/2003
Durham				
	1 Black River Road	Folsom's Tavern / Odiorne Farm	DUR0008	7/31/06
Effingham				
	Town House Road	NE Masonic Charitable Institute/Effingha	EFF0001	04/29/2002
Epsom				
	1598 Dover Road (Route 4)	Epsom Town Hall	EPS0094	1/26/2004
Farmington				
	77 Sheepboro Road	Sarah and Simon Green Farm	FAR0016	7/26/2004
Francestown				
		1940 Elementary School	FRN0019	07/28/08
	101 Main St	Timothy Gay Store	FRN0032	07/28/08
	105 Bible Hill Road	Gregg-Montgomery House	FRN0002	04/27/09
	108 Main St	Robert Bradford House	FRN0031	07/28/08

Town Name	Address	Property Name	Property ID	SR Listing Date
	126 Main St	Porter Dodge House	FRN0034	07/28/08
	136 Main St	Betsy Searle House	FRN0033	07/28/08
	144 Main St	Luther Farley House	FRN0043	07/28/08
	157 Main St	Joseph Punchard House	FRN0045	07/28/08
	157 New Boston Rd	Issacher Dodge House	FRN0003	07/28/08
	169 Main St	George Cummings House	FRN0049	07/28/08
	177 Main St	Caroline Wilson House	FRN0050	07/28/08
	178 Main St	Jonah Davis House	FRN0047	07/28/08
	18 Main St	Congregational Church	FRN0024	07/28/08
	189 Main St	Jesse Duncklee House	FRN0051	07/28/08
	192 Rte 136 E	Robert Todd House	FRN0005	10/27/08
	194 New Boston Road	Joseph Huntington House	FRN0006	07/28/08
	198 Main St	Daniel Thompson House	FRN0053	07/28/08
	2 Potash Rd	Joseph Kingsbury House	FRN0012	07/28/08
	201 Main St	Blacksmith Shop	FRN0052	07/28/08
	210 Main St	Ebenezer Bullard Place	FRN0055	07/28/08
	215 New Boston Rd	Luke Preston House	FRN0007	07/28/08
	27 2nd NH Tpke S	Uriah Smith Store	FRN0014	07/28/08
	27 Oak Hill Rd	Nathan Marden House	FRN0037	07/28/08
	27A Oak Hill Rd	E.W. Coburn Shop	FRN0036	07/28/08
	36 2nd NH Tpke S	Amasa Downs House	FRN0013	07/28/08
	36 Main St	Joseph Willard House	FRN0021	07/28/08
	5 Potash Rd	The Mill House	FRN0010	07/28/08
	57 Main St	Samuel Lolly House	FRN0023	07/28/08
	69 Oak Hill Rd	Samuel Burge House	FRN0042	07/28/08
	74 Oak Hill Rd	Reed P. Ordway House	FRN0040	07/28/08
	84 Main St	Long Store	FRN0029	07/28/08
	84 Main St	Oliver Butterfield House	FRN0030	07/28/08
	98 Main St	Herbert Vose House	FRN0035	07/28/08
	Main St	Peter Clark House	FRN0028	07/28/08
	Potash Rd	John Carson House	FRN0011	07/28/08
Gilford				
	24 Belknap Mountain Road	Union Meetinghouse	GLF0028	4/28/2003
	88 Alvah Wilson Rd (formerly Belknap Mountain R	Benjamin Rowe House	GLF0045	1/27/2003
Gilmanton				
	NH Route 129 at Sanborn Hill Road	Kelley's Corner School	GLM0015	04/28/08
Goffstown				

APPENDIX C

Dilution Calculation

PURPOSE

The USEPA RGP allows application of dilution factors to revise effluent limits to those listed in Appendix IV for metals for discharges from permitted groundwater remediation systems based on the 7Q10 flow data for the receiving water. In this calculation, the applicable dilution range calculation is computed based on the guidance provided in the RGP.

REFERENCES

1. USEPA, Remediation and Miscellaneous Contaminated Sites General Permit in New Hampshire (NHG91000), August 26, 2010.

METHOD

1. Calculate the dilution factor based on the 7Q10 data provided by NHDES.
2. Refer to the corresponding dilution factor column provided in Appendix IV for copper and iron.

Dilution Factor (DF):

$$DF = \frac{Qd + Qs}{Qd} * 0.9$$ [Ref. 1, Appendix V, page 5]

Where: DF = Dilution Factor
Qd = Maximum flow rate of the discharge in cubic feet per second (cfs)
= 50 gallons per minute (gpm) = 0.1115 cfs
Qs = Receiving water 7Q10 flow, cfs = 340.5 cfs

Where: 7Q10 = annual minimum flow for 7 consecutive days with a recurrence interval of 10 years
0.9 = allowance for reserving 10% of the assets in the receiving stream per Env-Ws 1700, NH Surface Water Quality Regulations

$$DF = \frac{0.1115\,cfs + 340.5\,cfs}{0.1115\,cfs} * 0.9 = \underline{\underline{2{,}749}}$$

Recommendations

Based on the evaluation above, with a dilution factor of 2,749, the effluent limit for copper should be revised from 2.9 micrograms per liter (µg/l) to 285 µg/l, and the effluent limit for iron should be revised from 1,000 µg/l to 5,000 µg/l.

APPENDIX D

Receiving Water Data

Kate Emma Schlosser

From: Andrews, Jeff [Jeffrey.Andrews@des.nh.gov]
Sent: Tuesday, December 11, 2007 1:36 PM
To: Kate Emma Schlosser
Subject: RE: 7Q10 Data for the Pemigewasset River

Oops. We just caught an error in the 7Q10. It should be 340.5 cfs. We had double counted the flow from the Winnipesaukee River which is downstream of Acme.

Thanks, Jeff

Jeffrey G. Andrews, P.E.
Sanitary Engineer
Wastewater Engineering Bureau
NH Department of Environmental Services
Tel: (603) 271-2984
Fax: (603) 271-4128
E-mail: Jeff.Andrews@des.nh.gov

-----Original Message-----
From: Kate Emma Schlosser [mailto:keschlosser@sanbornhead.com]
Sent: Tuesday, December 11, 2007 1:29 PM
To: Andrews, Jeff
Subject: RE: 7Q10 Data for the Pemigewasset River

Hi Jeff,

Thank you for the information. Yes, I received a faxed copy of the November 2005 letter. We have passed the information on to Acme.

Thanks again,
Kate Emma

Kate Emma Schlosser, P.E.
Senior Project Engineer

Sanborn, Head and Associates
20 Foundry Street
Concord, New Hampshire 03301
Direct (603) 415 - 6167
Main (603) 229 - 1900 ext. 6167
Fax (603) 229 - 1919
Email keschlosser@sanbornhead.com

From: Andrews, Jeff [mailto:Jeffrey.Andrews@des.nh.gov]
Sent: Tuesday, December 11, 2007 1:22 PM
To: Kate Emma Schlosser
Subject: RE: 7Q10 Data for the Pemigewasset River

Hi Kate Emma, did I ever get you the copy of the 11/7/05 letter that you asked for? Also, although you didn't need it after all, we finished the actual 7Q10 at Acme Staple and it is 445.2 cfs. This may come in handy during the next reissuance of the permit.

Thanks, Jeff

Jeffrey G. Andrews, P.E.
Sanitary Engineer
Wastewater Engineering Bureau
NH Department of Environmental Services
Tel: (603) 271-2984
Fax: (603) 271-4128
E-mail: Jeff.Andrews@des.nh.gov

-----Original Message-----
From: Kate Emma Schlosser [mailto:keschlosser@sanbornhead.com]
Sent: Tuesday, October 30, 2007 12:01 PM
To: Andrews, Jeff
Cc: Paul Rydel
Subject: RE: 7Q10 Data for the Pemigewasset River

Hi Jeff,

Our understanding of permit effluent limits is based on a September 22, 2005 letter from USEPA to Acme, in which USEPA refers Acme to the effluent limits in Appendix III of the RGP, and does not consider the limits in Appendix IV. If the effluent limits for metals have been adjusted to reflect the ">100" dilution range values in Appendix IV, then we would not need the 7Q10 data.

For clarification, can you provide us with a copy of your November 7, 2005 letter?

Thank you,
Kate Emma

_____
Kate Emma Schlosser, P.E.
Senior Project Engineer

Sanborn, Head and Associates
20 Foundry Street
Concord, New Hampshire 03301
Direct (603) 415 - 6167
Main (603) 229 - 1900 ext. 6167
Fax (603) 229 - 1919
Email keschlosser@sanbornhead.com

-----Original Message-----
From: Andrews, Jeff [mailto:Jeffrey.Andrews@des.nh.gov]
Sent: Tuesday, October 30, 2007 11:14 AM
To: Kate Emma Schlosser
Subject: RE: 7Q10 Data for the Pemigewasset River

Thanks Kate. FYI, the permit for Acme has metals limits for the ">100" dilution range in Appendix IV of the RGP. This was mentioned in our letter to them dated November 7, 2005 in which we adopted the permit as a state permit. I think EPA may have been silent on this. Is Acme having trouble meeting these limits? If this is the case they need to send in the discharge monitoring reports to EPA and DES. Also, if they need limits different than those in Appendix IV for metals EPA may require that they file for an individual permit.

Please let me know if the existing permit is okay so I can stop working on the 7Q10 update.

Thanks, Jeff

Jeffrey G. Andrews, P.E.
Sanitary Engineer
Wastewater Engineering Bureau
NH Department of Environmental Services
Tel: (603) 271-2984
Fax: (603) 271-4128
E-mail: Jeff.Andrews@des.nh.gov

-----Original Message-----
From: Kate Emma Schlosser [mailto:keschlosser@sanbornhead.com]
Sent: Tuesday, October 30, 2007 10:41 AM
To: Andrews, Jeff
Cc: Paul Rydel
Subject: RE: 7Q10 Data for the Pemigewasset River

Hi Jeff,

We are reviewing the potential for a modification to the RGP effluent limits for metals in an existing remediation system discharge at the Acme Staple site in Franklin. The site is currently permitted through the RGP program, but an evaluation of possible adjustments to the effluent limits to reflect dilution by the receiving water (as allowed by the RGP) has not been conducted.

Please give me a call if you have further questions.

Thank you,
Kate Emma

Kate Emma Schlosser, P.E.
Senior Project Engineer

Sanborn, Head and Associates
20 Foundry Street
Concord, New Hampshire 03301
Direct (603) 415 - 6167
Main (603) 229 - 1900 ext. 6167
Fax (603) 229 - 1919
Email keschlosser@sanbornhead.com

-----Original Message-----
From: Andrews, Jeff [mailto:Jeffrey.Andrews@des.nh.gov]
Sent: Monday, October 29, 2007 2:37 PM

To: Kate Emma Schlosser
Subject: RE: 7Q10 Data for the Pemigewasset River

Hi Kate Emma, I need to ask you what you need the 7Q10 for. I assume it's for the remediation general permit but I need to know if it's for a long term discharge for which we will need to conduct an antidegradation review pursuant to Env-Ws 1708.

Thanks, Jeff

Jeffrey G. Andrews, P.E.
Sanitary Engineer
Wastewater Engineering Bureau
NH Department of Environmental Services
Tel: (603) 271-2984
Fax: (603) 271-4128
E-mail: Jeff.Andrews@des.nh.gov