



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL RETURN RECEIPT REQUESTED

MAR 24 2011

Carmen Frederico
Chief Financial Officer
Bradford and Bigelow, Inc.
3 Perking Way
Newburyport, MA 01950

Re: Authorization to discharge under the Remediation General Permit (RGP) –
MAG910000. Bradford and Bigelow, Inc., (former GI Plastek) site located at 3 Perkins
Way, Newburyport, MA 01950, Essex County; Authorization # MAG910380-
Reissuance

Dear Mr. Frederico:

Based on the review of a Notice of Intent (NOI) submitted on behalf of Bradford & Bigelow, by the firm Ranson Environmental Consultants, Inc., for the site referenced above, the U.S. Environmental Protection Agency (EPA) hereby authorizes you, as the named Owner and Operator, to discharge in accordance with the provisions of the RGP at that site. Your authorization number is listed above.

The checklist enclosed with this RGP authorization indicates the pollutants 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 checklist 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 the enclosed checklist includes parameters that exceeded Appendix III limits. The checklist also includes other parameters for which your laboratory reports indicated there was insufficient sensitivity to detect these parameters at the minimum levels established in Appendix VI of the RGP.

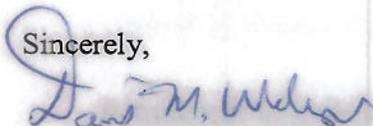
Also, please note that the metals included on the list are dilution dependent pollutant and subject to limitations based on a dilution factor range (DFR). Due to the absence of dilution at the point of discharge, since this discharge is to an unnamed swale, EPA determined that the DFR for these parameters is in the one to five (1-5) range. (See the RGP Appendix IV for Massachusetts facilities). Therefore, the limit for antimony of 5.6ug/L, arsenic of 10ug/L, cadmium of 0.2, chromium III (trivalent) of 48.8ug/L, copper of 5.2ug/L, lead of 1.3ug/L, nickel of 29ug/L, selenium of 5ug/L, zinc of 66.6ug/L and iron of 1000ug/L are required to achieve permit compliance at your site

Finally, please note the list of pollutants attached to 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 this project will terminate on December 31, 2030. If for any reason the discharge terminates sooner 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: Kathleen Keohane, MassDEP
Heather E Dudley, Ransom Environmental Consultants, Inc.

**2010 Remediation General Permit
Summary of Monitoring Parameters¹¹**

NPDES Authorization Number:		MAG910380 - Reissuance
Date Authorization Issued:	March, 2011	
Facility/Site Name:	Bradford & Bigelow, Inc., (Former Plasteck)	
Facility/Site Address:	3 Perkins Way, Newburyport, Ma 01950, Essex County	
Legal Name of Operator:	Bradford & Bigelow, Inc.	
Operator contact name, title, and Address:	Same as the Owner. Email : same as the owner	
Estimated Date of Completion:	December 31, 2030	
Category and Sub-Category:	Class II. Subcategory B. VOC Sites with Additional Contamination	
Receiving Water:	Drainage swale to Little 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/ML5ug/L
✓	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/ML 5.0mg/L
	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	70.0 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)
	(MtBE)	
✓	12. tert-Butyl Alcohol (TBA) (TertiaryButanol)	Monitor Only(ug/L)/Me#8260C/ML 10ug/L
✓	13. tert-Amyl Methyl Ether (TAME)	Monitor Only(ug/L)/Me#8260C/ML 10ug/L
	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/ ML 5ug/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 2 ug/L/ Me# 420.4 /ML 50ug/L
	32. Pentachlorophenol (PCP)	1.0 ug/L /Me#8270D/ML 5ug/L,Me#604 &625/ML 10ug/L
	33. Total Phthalates (Phthalate esters) ⁶	3.0 ug/L ** /Me#8270D/ML 5ug/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/ML 5ug/L,Me#606/ML 10ug/L & Me#625/ML 5ug/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,

<u>Parameter</u>	<u>Effluent Limit/Method#/ML</u> (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	Me#610/ML 5ug/L& Me#625/ML 5ug/L
d. Benzo(k)Fluoranthene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
e. Chrysene ⁷	0.0038 ug/L /Me#8270D/ML 5ug/L, Me#610/ML 5ug/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/ML5ug/L
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	100 ug/L
h. Acenaphthene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
i. Acenaphthylene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
j. Anthracene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
k. Benzo(ghi) Perylene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
l. Fluoranthene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
m. Fluorene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
n. Naphthalene ⁵	20 ug/l / Me#8270/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
o. Phenanthrene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
p. Pyrene	X/Me#8270D/ML5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/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

	<u>Metal parameter</u>	<u>Total Recoverable Metal Limit @ H ¹⁰ = 50 mg/l CaCO3 for discharges in Massachusetts (ug/l) _{11/12}</u>		<u>Minimum level=ML</u>
		<u>Freshwater</u>	<u>Saltwater</u>	
✓	39. Antimony	5.6/ML 10		
✓	40. Arsenic **	10/ML20	36/ML 20	
✓	41. Cadmium **	0.2/ML10	8.9/ML 10	
✓	42. Chromium III (trivalent) **	48.8/ML15	100/ML 15	

	Metal parameter	Total Recoverable Metal Limit @ H¹⁰ = 50 mg/l CaCO₃ for discharges in Massachusetts (ug/l) 11/12		Minimum level=ML
		Freshwater	Saltwater	
	43. Chromium VI (hexavalent) **	11.4/ML10	50.3/ML 10	
✓	44. Copper **	5.2/ML15	3.7/ML 15	
✓	45. Lead **	1.3/ML20	8.5/ML 20	
	46. Mercury **	0.9/ML0.2	1.1/ML 0.2	
✓	47. Nickel **	29/ML20	8.2/ML 20	
✓	48. Selenium **	5/ML20	71/ML 20	
	49. Silver	1.2/ML10	2.2/ML 10	
✓	50. Zinc **	66.6/ML15	85.6/ML 15	
✓	51. Iron	1,000/ML 20		

	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

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 $DF \times 1,000 \text{ ug/L}$ (the iron base limit). Therefore DF is 1.5, the iron limit will be 1,500 ug/L; DF 2, then iron limit = $1,000 \times 2 = 2,000 \text{ ug/L}$, 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