



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUN 13 2013

William A. Simmons, LSP, J.D.
Simmons Environmental Services, Inc
213 Elm Street
Salisbury, MA 01952

Re: Authorization to discharge under the Remediation General Permit (RGP) –
MAG910000. Former Gas Station Excavation Dewatering site located at
99 Friend Street, Amesbury, MA 01913, Essex County; Authorization # MAG910580

Dear Mr. Simmons:

Based on the review of a Notice of Intent (NOI) submitted on behalf of M.W. Development, LLC, by your firm Simmons Environmental Services, 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. 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 the RGP's 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 MLs established in Appendix VI of the RGP.

Also, please note that the metals included on the checklist are dilution dependent pollutants and are subject to discharge limitations based on a dilution factor range (DFR). With the limited dilution to Powwow River, EPA determined that the DFR for each parameter is in the one and five (1-5) range. (See the RGP Appendix IV for Massachusetts facilities) Therefore, the limits for lead of 1.3 ug/L and for iron of 1,000 ug/L are required to achieve permit compliance at your site.

Finally, please note the checklist 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 (6) months. A recertification can be submitted to EPA within six (6) to twelve (12) months of operations in accordance with the 2010 RGP.

This general permit and authorization to discharge will expire on September 9, 2015. You have reported that this project will terminate on 08/10/2013. 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,



Thelma Murphy, Chief
Storm Water and Construction
Permits Section

Enclosure

cc: Robert Kubit, MassDEP
Robert Desmarais, Amesbury DPW

**2010 Remediation General Permit
Summary of Monitoring Parameters^[1]**

NPDES Authorization Number:		MAG910580
Authorization Issued:	June, 2013	
Facility/Site Name:	Former Gas Station/ Excavation Dewatering	
Facility/Site Address:	99 Friend Street, Amesbury, MA 01913, Essex County	
	Email address of owner: susan@wojcickidevelopment.com	
Legal Name of Operator:	Simmons Environmental Services, Inc.	
Operator contact name, title, and Address:	William A. Simmons, LSP, 213 Elm Street, Salisbury, MA 01952	
	Email: info@simmons21e.com	
Estimated date of The Project Completion:	08/10/2013	
Category and Sub-Category:	Petroleum Related Site Remediation. Sub-category A. Gasoline Only Sites.	
RGP Termination Date:	September 10, 2015	
Receiving Water:	Powwow River	

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

	<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)
✓	1. Total Suspended Solids (TSS)	30 milligrams/liter (mg/L) **, 50 mg/L for hydrostatic testing ** Me#160.2/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 10ug/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

	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)
✓	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 (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

	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)
	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
	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 100 ug/L

	Metal parameter	Total Recoverable Metal Limit @ H¹⁰ = 50 mg/l CaCO₃ for discharges in Massachusetts (ug/l)^{11/12} /ML	
		Freshwater	Saltwater
	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
	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.

⁹Although 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



May 30, 2013
Ref.# 121003

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

Re: Remediation General Permit – Notice of Intent
Excavation Dewatering
99-101 Friend Street, Amesbury, MA 01913
MassDEP RTN 3-31433

Dear EPA:

On behalf of the M.W. Development, LLC, Simmons Environmental Services, Inc. (SIMMONS) has prepared the following Notice of Intent of a Remediation General Permit (RGP) to begin operation of a dewatering system during excavation and offsite recycling of gasoline contaminated soil at 99-101 Friend Street in Amesbury, MA. Based upon the need for dewatering of this area, the subject discharge for this RGP should be classified as Category I (Petroleum Related Site Remediation), Subcategory A (Gasoline Only Sites). This RGP is being requested to allow for the dewatering to discharge to the adjacent storm drain system that drains into the Powwow River.

Background

The property is owned by M.W. Development, LLC. The property was previously operated as a gasoline service station and auto repair between the 1940's and 1980's. Contaminants detected at the property that exceeded MassDEP standards consisted of gasoline based TPHs and/or xylenes in soil and groundwater that were released from the former gasoline and dispensing pumps. MassDEP was notified of the release under Release Tracking Number (RTN) 3-31433. The property layout is shown in the enclosed Dewatering Site Plan (Figure 2).

The Town of Amesbury will be contacted to determine if this dewatering activity and discharge to the storm drain system requires a separate application submittal for a Notice of Intent or Negative Determination of Applicability.

Treatment System

As shown in the Dewatering Site Plan (Figure 2) and Process Flow Diagram (Figure 3), groundwater will be pumped from the contaminated soil excavation area into a fractionization tank, then through a bag filter and liquid phase carbon treatment unit, and then pumped out to the storm drain system that leads to the Powwow River. There is no available flow data, i.e. 7Q10, for the Powwow River that discharges into the Merrimack River. The closest comparable flow data is the Spicket River that is larger in size than the Powwow River and also discharges into the Merrimack River. The 7Q10 value (Qs) for the Spicket River listed by the U.S.G.S. National



Water Information System is 14 cubic feet per second (cfs). The maximum flow value (Qd) of discharge is 40 gpm or 0.0892 cfs. Consequently the dilution factor ($DF = [(Qd + Qs) / Qd] \times 0.9$) is 142.1. Therefore, any exceedance of any EPA water samples limits is not expected. The maximum and average daily values for the contaminants detected were based upon 40 and 20 gallons per minute (gpm) respectively over a maximum 8 hour work day. The discharge period is not expected to be more than 8 hours per day for a maximum of 10 days that it is anticipated to take to complete the project. However, groundwater discharged from the fractionation tank to the storm drain system after treatment will be monitored and sampled to confirm that there are no exceedances of the Appendix III limits.

ACEC and NHESP Habitats

According to review of the Massachusetts Geographic Information System (GIS) Site Scoring Map, the Powwow River is not part of the National Heritage Endangered Species Program (NHESP) habitat or Area of Critical Environmental Concern (ACEC).

Because the area of dewatering is related to MassDEP disposal site Release Tracking Number (RTN) 3-31433 and covered under the Massachusetts Contingency Plan (MCP) codified as 310 CMR 40.0000, then there is no need to apply to the state for coverage under BRP WM 12 (Remediation & Miscellaneous Contaminated Sites General Permit) and no fee to the MassDEP Division of Watershed Management is required.

If you have any questions concerning the above-mentioned information, please do not hesitate to call.

A handwritten signature in cursive script that reads 'Stephan H. Landry'.

Stephan H. Landry
Hydrogeologist

A handwritten signature in cursive script that reads 'William A. Simmons'.

William A. Simmons, LSP, J.D.

cc:

M.W. Development, LLC.
MassDEP, Division of Watershed Mgmt.

Attachments:

Form for Notice of Intent for General Remediation Permit
Figure 1 – Site Locus Map (USGS Quadrangle)
Figure 2 – Dewatering Site Plan
Figure 3 – Process Flow Diagram
Figure 4 – MassDEP Resource Area Map
Laboratory Analyses Report

**213 Elm Street
Salisbury, MA 01952
Tel: 978-463-6669**

Remediation General Permit Appendix V

Notice of Intent (NOI) Suggested Forms & Instructions

I. Notice of Intent (NOI) Suggested Form and Instructions

In order to be covered by the remediation general permit (RGP), applicants must submit a completed Notice of Intent (NOI) to EPA Region I and the appropriate state agency. The owner or operator, as defined by 40 CFR § 122.2, means the owner or operator of any “facility or activity” subject to regulation under the NPDES program.

The following are three general “**operator**” scenarios (variations on any of these three are possible, especially as the number of owners and contractors increases):

- ▶ “*Owner*” as “*Operator*” - *sole permittee*. The property owner designs the structures and control systems for the site, develops and implements the BMPP, and serves as general contractor (or has an on-site representative with full authority to direct day-to-day operations). Under the definition of operator, in this case, the “Owner” would be considered the “operator” and therefore the only party that needs permit coverage. Everyone else working on the site may be considered subcontractors and do not need to apply for permit coverage.
- ▶ “*Contractor*” as “*Operator*” - *sole permittee*. The property owner hires a company (e.g., a contractor) to design the project and oversee all aspects, including preparation and implementation of the BMPP and compliance with the permit (e.g., a “turnkey” project). Here, the contractor would likely be the only party needing a permit. Similarly, EPA expects that property owners hiring a contractor or consultant to perform groundwater remediation work (e.g., due to a leaking fuel oil tank) would come under this type of scenario. EPA believes that the contractor, being a professional in the industry, should be the responsible entity rather than the individual. The contractor is better equipped to meet the requirements of both applying for permit coverage and developing and properly implementing the plans needed to comply with the permit. However, property owners would also meet the definition of “operator” and require permit coverage in instances where they perform any of the required tasks on their personal properties.
- ▶ “*Owner*” and “*Contractor*” as “*Operators*” - *co-permittees*. The owner retains control over any changes to site plans, BMPPs, or wastewater conveyance or control designs, but the contractor is responsible for conducting and overseeing the actual activities (e.g., excavation, installation and operation of treatment train, etc.) and daily implementation of BMPP and other permit conditions. In this case, both parties need to apply for coverage.

Generally, a person would not be considered an “operator,” and subsequently would not need permit coverage, if: 1) that person is a subcontractor hired by, and under the supervision of, the owner or a general contractor (e.g., if the contractor directs the

subcontractor's activities on-site, it is probably not an operator); or 2) the person's activities would otherwise result in the need for coverage under the RGP but another operator has legally assumed responsibility for the impacts of project activities.

A. Instructions for the Suggested Notice of Intent (NOI) - At a minimum, the Notice of Intent must include the following for each individual facility or site. Additional information may be attached as needed.

1. General facility/site information.

- a) Provide the facility/site name, mailing address, and telephone and fax numbers. Provide the facility Standard Industrial Classification (SIC) code(s), which can be found online at http://www.osha.gov/pls/imis/sic_manual.html. Provide the site location, including longitude and latitude.
- b) Provide the facility/site owner's name, address, email address, telephone and fax numbers, if different from the site information. Indicate whether the owner is a Federal, State/Tribal, private, or other entity.
- c) Provide the site operator's (e.g., contractor's) name, mailing address, telephone and fax numbers, and email address if different from the owner's information.
- d) For the site for which the application is being submitted, indicate whether:
 - 1) a prior NPDES permit exclusion has been granted for the discharge (if so, provide the tracking number of the exclusion letter);
 - 2) a prior NPDES application (Form 1 & 2C – for reference, please visit http://www.epa.gov/region1/npdes/epa_attach.html) has ever been filed for the discharge (if so, provide the tracking number and date that the application was submitted to EPA);
 - 3) the discharge is a “new discharge” as defined by 40 CFR 122.2; and
 - 4) for sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) 310 CMR 40.0000 and exempt from state permitting.
- e) Indicate whether there is any ongoing state permitting, licensing, or other action regarding the facility or site which is generating the discharge. If “yes,” provide any site identification number assigned by the state of NH or MA, any permit or license number assigned, and the state agency contact information (e.g. name, location, telephone no.).
- f) Indicate whether or not the facility is covered by other EPA permits including:
 - 1) the Multi-Sector General Permit (MSGP)
<http://cfpub.epa.gov/npdes/stormwater/msgp.cfm>;
 - 2) the Final NPDES General Permit for Dewatering Activity Discharges in Massachusetts and New Hampshire
<http://www.epa.gov/region1/npdes/dewatering.html>;
 - 3) the EPA Construction General Permit
<http://cfpub.epa.gov/npdes/stormwater/cgp.cfm>;
 - 4) an individual NPDES permit; or
 - 5) any other water quality-related individual or general permit.If so, provide permit tracking number(s).
- g) Indicate if the site/facility discharge(s) to an Area of Critical Environmental Concern (ACEC), as shown on the tables and maps in Appendix I.

h) Based on the nature of the facility/site and any historical sampling data, the applicant must indicate which of the sub-categories within which the potential discharge falls.

2. Discharge information.

- a) Describe the discharge activities to be covered by the permit. Attach additional sheets as needed.
- b) Provide the following information about each discharge:
 - 1) the number of discharge points;
 - 2) the maximum and average flow rate of the discharge in cubic feet per second. For the average flow magnitude, include the units and appropriate notation if this value is a calculated design value or estimate if technical/design information is not available;
 - 3) the latitude and longitude of each discharge with an accuracy of 100 feet (see EPA's siting tool at: http://www.epa.gov/tri/report/siting_tool);
 - 4) the total volume of potential discharge (gal), only if hydrostatic testing;
 - 5) whether the discharge(s) is intermittent or seasonal and if ongoing.
- c) Provide the expected start and end dates of discharge (month/day/year).
- d) 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).

3. Contaminant information.

In order to complete the NOI, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for the parameters applicable to the sub-category into which the discharge falls, as listed in Appendix III of the permit and selected in Part 1 of the NOI form, except as noted below.

Permittees shall provide additional sampling results with the NOI if such sampling already exists, or if the permittee has reason to believe the site contains additional contaminants not listed in Appendix III for that sub-category or contains additional contaminants not included in Appendix III.

The applicant may use historical data as a substitute for the new sample if the data was collected no more than 2 years prior to the "Submittal of the NOI" and if collected pursuant to:

- i. for sites in Massachusetts, 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E");
- ii. for sites in New Hampshire, New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act;

a) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is believed present or believed absent in the potential discharge.

Based on the required sampling and analysis, the applicant must fill in the table, or provide a narrative description, with the following additional information for each chemical that is believed present (chemical that violate EPA's criteria limitations):

- 1) the number of samples taken (minimum of one sample for applicable parameters per Appendix III);
- 2) the type of sample (e.g. grab, composite, etc.);
- 3) the analytical method used, including the method number;
- 4) the minimum level (ML) of the method used (based on Appendix VI);
- 5) the maximum daily amount (concentration (ug/l) and mass (kg)) of each pollutant, based on the sampling data

lb/day (pounds per day) equals flow (in million gallons per day, MGD) times concentration in milligrams per liter (mg/l) times 8.34.

Example: 2.5 MGD x 30 mg/l TSS x 8.34 = 625.5 lb TSS/day

MGD = gallons per minute (gpm) x 0.00144

1 kg = 2.2 lbs

And;

- 6) the average daily amount (concentration and mass) of each pollutant, based on the sampling data.

If the results of any sampling indicate that pollutants exist in addition to those listed in Appendix III of the RGP of the permit, the applicant must also describe those contaminants on the NOI in boxes in section I.3.c.) on the line marked "Other," or use additional sheets as needed. Subsequently, EPA may require monitoring for such parameters or will decide if an individual permit is necessary.

c) Determination of Reasonable Potential and Allowable Dilution for Discharges of Metals:

If any *metals* are believed present in the potential discharge to freshwater¹, the applicant must follow the procedures below to determine the dilution factor for each metal.

Step 1: Initial Evaluation

- 1) The applicant must evaluate all metals believed present in the discharge subject to this permit, including "naturally occurring" metals such as dissolved and/or total Iron. Applicants must enter the highest detected concentration of the metal at zero dilution in the "Maximum value" column of the NOI.
- 2) Based on the maximum concentration of each metal, the applicant must perform an initial evaluation assuming zero dilution in the receiving water. The applicant must compare the metals concentrations in the untreated (intake) waters to the effluent limits contained in Appendix III.

¹Dilution factors may be available for discharges to saline waters but only with approval of the flow modeling information from the State prior to the submission of the NOI.

- i. If potential discharges (untreated influent) with metals contain concentrations above the concentration limits listed in Appendix III, applicant must proceed to step 2.
- ii. If potential discharges (untreated influent) with metals contain concentrations below the concentrations listed in Appendix III, the applicant may skip step 2 and those metals will **not** be subject to permit limitations or monitoring requirements.

Step 2: Calculation of Dilution Factor

1) **For applicants in NH:** If a metal concentration in a potential discharge (untreated influent) to **freshwater** exceeds the limits in Appendix III with zero dilution, the applicant shall evaluate the potential concentration considering a dilution factor (DF) using the formula below. **For sites in New Hampshire, the applicant must contact NH DES to determine the 7Q10 and dilution factor.**

$$DF = [(Qd + Qs)/Qd] \times 0.9$$

Where:

- DF** = Dilution Factor
- Qd** = Maximum flow rate of the discharge in cubic feet per second (cfs) (1.0 gpm = .00223 cfs)
- Qs** = Receiving water 7Q10 flow, in cfs, where 7Q10 is the 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 as per Chapter ENV-Wq 1700, Surface Water Quality Regulations

i. Using the DF calculated from the formula above, the applicant must refer to the corresponding dilution range column in Appendix IV. The applicant then compares the maximum concentration of the metal entered on the NOI to the corresponding total recoverable metals limits listed in Appendix IV. Please note that for this reissuance the applicant will be permitted to determine a limit using any fraction within the 1-5 dilution factor range times the metal limit (for all regulated metals). For example: if the DF is 1.5, the Iron limit is 1,500 ug/L; if the DF is 1.5, the antimony limit is 8.4, etc. All limits above a dilution factor of 5 are maintained.

- 1. If a metal concentration in the potential discharge (untreated influent) is less than the corresponding limit in Appendix IV, the metal will **not** be subject to permit limitations or monitoring requirements.
- 2. If a metal concentration in the potential discharge (untreated influent) is equal to or exceeds the corresponding limit in Appendix IV, the applicant must reduce it in the effluent to a concentration below the applicable total recoverable metals limit in Appendix IV prior to discharge.

ii. In either case, the applicant must submit the results of this calculation as part of the NOI. EPA and NH DES will review the proposed effluent limitations for each metal and approve or disapprove the limits in the notification of coverage letter to the applicant.

2) **For applicants in MA:** If a metal concentration in a potential discharge (untreated influent) to **freshwater** exceeds the limits in Appendix III with zero dilution, the applicant must evaluate the potential concentration considering a dilution factor (DF) using the formula below.

$$DF = (Qd + Qs)/Qd$$

Where: **DF** = Dilution Factor
Qd = Maximum flow rate of the discharge in cubic feet per second (cfs) (1.0 gpm = .00223 cfs)
Qs = Receiving water 7Q10 flow (cfs) where 7Q10 is the minimum flow (cfs) for 7 consecutive days with a recurrence interval of 10 years

i. The applicant may estimate the 7Q10 for receiving water by using available information such as nearby USGS stream gauging stations directly or by application of certain “flow factors,” using historic streamflow publication information, calculations based on drainage area, information from state water quality offices, or other means. In many cases Massachusetts has calculated 7Q10 information using “flow factors” for a number of streams in the state. The source of the low flow value(s) used by the applicant must be included on NOI application form. Flow data can also be obtained from web applications such as the one located at: <http://ma.water.usgs.gov/streamstats/>.

ii. Using the DF calculated from the formula above, the applicant must refer to the corresponding dilution range column in Appendix IV. The applicant then shall compare the maximum concentration of each metal entered on the NOI to the corresponding total recoverable metals limit listed in Appendix IV. Please note that for this reissuance the applicant will be permitted to determine a limit using any fraction of the 0-5 of DF times the metal limit (for all regulated metals). For example: if the DF is 1.5, the Iron limit is 1,500 ug/L; if the DF is 1.5, the antimony limit is 8.4, etc. Not to exceed DF of 5.

1. If a metal concentration in the potential discharge (untreated influent) is less than the corresponding limit in Appendix IV, the metal will **not** be subject to permit limitations or monitoring requirements.
2. If a metal concentration in a potential discharge (untreated influent) is equal to or exceeds the corresponding limit in Appendix IV, the applicant must reduce it in the effluent to a concentration below the applicable total recoverable metals limit in Appendix IV prior to discharge.

iii. The applicant must submit the results of this calculation as part of the NOI. EPA (and MassDEP where the discharge is not covered by 310 CMR 40.0000) will review the proposed effluent limitations for each metal and approve or disapprove the limits in the notification of coverage letter to the applicant.

4. Treatment system information.

- a) Provide a written description of the treatment train and how the system will be set up for each discharge and attach a schematic of the proposed or existing treatment system(s).
- b) Identify each major treatment unit (e.g. frac tanks, filters, air stripper, liquid phase/vapor phase activated carbon, oil/water separators, etc.) by checking all that apply and describing any additional equipment not listed. Attach additional sheets as needed.
- c) Provide the proposed average and maximum flow rates (in gallons per minute, gpm) for the discharge and the design flow rates (in gpm) of the treatment system. Clearly identify the component of the treatment with the most limited flow, i.e., the part of the treatment train that establishes the design flow.
- d) Describe any chemical additives being used, or planned to be used, and attach MSDS sheets for each. EPA may request further information regarding the chemical composition of the additive, potential toxic effects, or other information to insure that approval of the use of the additive will not cause or contribute to a violation of State water quality standards. Approval of coverage under the RGP will constitute approval of the use of the chemical additive(s). If coverage of the discharge under the RGP has already been granted and the use of a chemical additive becomes necessary, the permittee must submit a Notice of Change (NOC).

5. Receiving surface water(s) information.

- a) Identify the discharge pathway by checking whether it is discharged: directly to the receiving water (river, stream, or brook), within the facility (e.g., through a sewer drain), to a storm drain, to a wetland, or other receiving body.
- b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters into which discharge will occur.
- c) Provide a detailed map(s) indicating the location of the site and outfall(s) to the receiving water(s):
 - 1) For multiple discharges, the discharges should be numbered sequentially.
 - 2) In the case of indirect dischargers (to municipal storm sewer, etc) the map(s) must be sufficient to indicate the location of the discharge to the indirect conveyance and the discharge to the state classified 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 and the basin (for Massachusetts, the Surface Water Quality Standards (314 CMR 4.00) are available at <http://www.mass.gov/dep/water/laws/regulati.htm#wqual>) (for New Hampshire, contact the NH DES at (603) 271-2984).
- e) Specify the reported seven day-ten year low flow (7Q10) of the receiving water (see Section I.A.3) c. above). In New Hampshire, the 7Q10 must be provided by to the applicant by the New Hampshire Department of Environmental Services.

f) Indicate whether the receiving water is a listed 303(d) water quality impaired or limited water and if so, for which pollutants (see Section IX of the Fact Sheet for additional information).

For MA, the most updated integrated list of waters (CWA 303(d) and 305(b)) is available at <http://www.mass.gov/dep/water/resources/tmdls.htm#info>.

For NH, the most updated integrated list of waters (CWA 303(d) and 305(b)) is available at <http://des.nh.gov/organization/divisions/water/wmb/swqa/index.htm>.

Also, indicate if there is a final TMDL for any of the listed pollutants. For MA, final TMDLs can be found at: <http://www.mass.gov/dep/water/resources/tmdls.htm> and for NH, final TMDLs can be found at

<http://des.nh.gov/organization/divisions/water/wmb/tmdl/index.htm>. For more information, contact the states at: New Hampshire Department of Environmental Services, Watershed Management Bureau at 603-271-3503 or the Massachusetts Department of Environmental Protection at 508-767-2796 or 508-767-2873.

6. ESA and NHPA Eligibility.

As required in Parts I.A.4 and Appendix VII the operator of a site/facility must ensure that the potential discharge will not adversely affect endangered species, designated critical habitat, or national historic places that are in proximity to the potential discharge. If the potential discharge is to certain water bodies, the applicant must also submit a formal certification with the NOI that indicates the consultation, with the U.S. Fish and Wildlife Service and National Marine Fisheries Service (the Services), resulted in either a no jeopardy opinion or a written concurrence on a finding that the discharge is not likely to adversely affect any endangered species or critical habitat. Facilities should begin the consultation as early in the process as possible.

- a) Using the instructions in Appendix VII and information in Appendix II, indicate under which criterion listed you are eligible for coverage under this general permit.
- b) If you selected criterion D or F, indicate if consultation with the federal services has been completed or if it is underway.
- c) If consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries Service was completed, indicate if a written concurrence finding that the discharge is “not likely to adversely affect” listed species or critical habitat was received.
- d) Attach documentation of ESA eligibility as described below and required in Appendix VII, Part I.C, Step 4.

Criterion A - No federally-listed threatened or endangered species or federally-designated critical habitat are present: A copy of the most current county species list pages for the county(ies) where your site or facility and discharges are located. You must also include a statement on how you determined that no listed species or critical habitat are in proximity to your site or facility or discharge locations.

Criterion B – Section 7 consultation completed with the Service(s) on a prior project: A copy of the USFWS and/or NOAA Fisheries, as appropriate, biological opinion or concurrence on a finding of “unlikely to adversely effect” regarding the ESA Section 7 consultation.

Criterion C – Activities are covered by a Section 10 Permit: A copy of the USFWS and/or the NOAA Fisheries, as appropriate, letter transmitting the ESA Section 10 authorization.

Criterion D - Concurrence from the Service(s) that the discharge is "not likely to adversely affect" federally-listed species or federally-designated critical habitat (not including the four species of concern identified in Section I of Appendix I): A copy of the USFWS and/or the NOAA Fisheries, as appropriate, letter or memorandum concluding that the discharge is consistent with the general permit's "not likely to adversely affect" determination.

Criterion E - Activities are covered by certification of eligibility: A copy of the documents originally used by the other operator of your site or facility (or area including your site) to satisfy the documentation requirement of Criteria A, B, C or D.

Criterion F - Concurrence from the Service(s) that the discharge is "not likely to adversely affect" species of concern, as identified in Section I of Appendix I: A copy of the USFWS and/or the NOAA Fisheries, as appropriate, concurrence with the applicant's determination that the discharge is "not likely to adversely affect" listed species.

- e) Using the instructions in Appendix VII, identify which criterion listed in Part C makes you eligible for coverage under this general permit.
- 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. Applicants should provide any supplemental information needed to meet the requirements of the permit, including any analytical data used to support the application, and any certification(s) required.

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.

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 : FORMER GAS STATION		Facility/site mailing address:	
Location of facility/site :		Street: 99 FRIEND STREET	
Longitude: 70° 56' 39"	Facility SIC code(s): 1799		
Latitude: 42° 51' 31"			
b) Name of facility/site owner :		Town: AMESBURY	
Email address of facility/site owner : susan@wojckidevelopment.com		State: MA	County: ESSEX
Telephone no. of facility/site owner : 978-388-5829		Zip: 01913	
Fax no. of facility/site owner : 978-834-0733		Owner is (check one): 1. Federal <input type="radio"/> 2. State/Tribal <input type="radio"/>	
Address of owner (if different from site): M.W. DEVELOPMENT, LLC		3. Private <input checked="" type="radio"/> 4. Other <input type="radio"/> if so, describe:	
Street: 110 MAIN STREET			
Town: AMESBURY	State: MA	Zip: 01913	County: ESSEX
c) Legal name of operator : Simmons Environmental Services, Inc.		Operator telephone no.: 978-463-6669	
Operator contact name and title: William A. Simmons, LSP or Stephan H. Landry, Project Manager/Hydrogeologist		Operator fax no.: 978-463-6679	Operator email: info@simmons21e.com
Address of operator (if different from owner):		Street: 213 ELM STREET	
Town: SALISBURY	State: MA	Zip: 01913	County: ESSEX

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:

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:

2. permit or license # assigned:

3. state agency contact information: name, location, and telephone number:

MASSDEP
 205B LOWELL STREET, WILMINGTON, MA 01887
 978-694-3200

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 <input checked="" type="checkbox"/> B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) <input type="checkbox"/> C. Petroleum Sites with Additional Contamination <input type="checkbox"/>
II - Non Petroleum Site Remediation	A. Volatile Organic Compound (VOC) Only Sites <input type="checkbox"/> B. VOC Sites with Additional Contamination <input type="checkbox"/> C. Primarily Heavy Metal Sites <input type="checkbox"/>
III - Contaminated Construction Dewatering	A. General Urban Fill Sites <input type="checkbox"/> B. Known Contaminated Sites <input type="checkbox"/>

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:

IV - Miscellaneous Related Discharges	A. Aquifer Pump Testing to Evaluate Formerly Contaminated Sites <input type="checkbox"/> B. Well Development/Rehabilitation at Contaminated/Formerly Contaminated Sites <input type="checkbox"/> C. Hydrostatic Testing of Pipelines and Tanks <input type="checkbox"/> D. Long-Term Remediation of Contaminated Sumps and Dikes <input type="checkbox"/> E. Short-term Contaminated Dredging Drain Back Waters (if not covered by 401/404 permit) <input type="checkbox"/>
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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:
 DEWATERING DURING EXCAVATION OF GASOLINE CONTAMINATED SOIL. RECOVERED WATER TO BE TREATED ONSITE BY CARBON BEFORE DISCHARGE TO STORM DRAIN THAT DRAINS TO POWWOW RIVER

b) Provide the following information about each discharge:

1) Number of discharge points:	1	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)?			
		Max. flow	0.0892	Is maximum flow a design value? Y <input type="radio"/> N <input checked="" type="radio"/>	Estimate
		Average flow (include units)	20 gpm	Is average flow a design value or estimate?	Estimate
3) Latitude and longitude of each discharge within 100 feet:					
pt. 1: lat	42° 51' 31"	long	70° 56' 39"	pt. 2: lat	long
pt. 3: lat	long	long	long	pt. 4: lat	long
pt. 5: lat	long	long	long	pt. 6: lat	long
pt. 7: lat	long	long	long	pt. 8: lat	long
4) If hydrostatic testing, total volume of the discharge (gals) N/A					
5) Is the discharge intermittent <input checked="" type="radio"/> or seasonal <input type="radio"/> ? Is discharge ongoing? Y <input checked="" type="radio"/> N <input type="radio"/>					
c) Expected dates of discharge (mm/dd/yy): start 06/10/2013 end 08/10/2013					
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) See Figure 3 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)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	160.2 SM5 25 ⁴	5 mg/L	689,000	50	689,000	25
2. Total Residual Chlorine (TRC)		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
3. Total Petroleum Hydrocarbons (TPH)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	1664A	5 mg/L	6,000	0.44	6,000	0.22
4. Cyanide (CN)	57125	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
5. Benzene (B)	71432	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	150	0.0108	150	0.0054
6. Toluene (T)	108883	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	2000	0.1456	2000	0.0728
7. Ethylbenzene (E)	100414	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	3400	0.248	3400	0.124
8. (m,p,o) Xylenes (X)	108883; 106423; 95476; 1330207	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	20200	1.47	20200	0.735
9. Total BTEX ²	n/a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	25750	2.314	25750	1.157
10. Ethylene Dibromide (EDB) (1,2-Dibromoethane) ³	106934	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Grab	8260	5 ug/L	none detected	none	none detected	none
11. Methyl-tert-Butyl Ether (MTBE)	1634044	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Grab	8260	5 ug/L	none detected	none	none detected	none
12. tert-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Grab	8260	5 ug/L	none detected	none	none detected	none

* 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Grab	8260	5 ug/L	none detected	none	none detected	none
14. Naphthalene	91203	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	580	0.42	580	0.21
15. Carbon Tetrachloride	56235	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
16. 1,2-Dichlorobenzene (o-DCB)	95501	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
17. 1,3-Dichlorobenzene (m-DCB)	541731	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
18. 1,4-Dichlorobenzene (p-DCB)	106467	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
18a. Total dichlorobenzene		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
19. 1,1-Dichloroethane (DCA)	75343	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
20. 1,2-Dichloroethane (DCA)	107062	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
21. 1,1-Dichloroethene (DCE)	75354	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
22. cis-1,2-Dichloroethene (DCE)	156592	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
23. Methylene Chloride	75092	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
24. Tetrachloroethene (PCE)	127184	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
25. 1,1,1-Trichloro-ethane (TCA)	71556	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
26. 1,1,2-Trichloro-ethane (TCA)	79005	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
27. Trichloroethene (TCE)	79016	<input checked="" type="checkbox"/>	<input type="checkbox"/>								

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
29. Acetone	67641	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
30. 1,4 Dioxane	123911	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
31. Total Phenols	108952	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
32. Pentachlorophenol (PCP)	87865	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
33. Total Phthalates (Phthalate esters) ⁴		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	117817	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
a. Benzo(a) Anthracene	56553	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
b. Benzo(a) Pyrene	50328	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
c. Benzo(b)Fluoranthene	205992	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
d. Benzo(k)Fluoranthene	207089	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
e. Chrysene	21801	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
f. Dibenzo(a,h)anthracene	53703	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
g. Indeno(1,2,3-cd) Pyrene	193395	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		<input checked="" type="checkbox"/>	<input type="checkbox"/>								

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
i. Acenaphthylene	208968	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
j. Anthracene	120127	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
k. Benzo(ghi) Perylene	191242	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
l. Fluoranthene	206440	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
m. Fluorene	86737	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
n. Naphthalene	91203	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	8260	5 ug/L	580	0.046	580	0.021
o. Phenanthrene	85018	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
p. Pyrene	129000	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
37. Total Polychlorinated Biphenyls (PCBs)	85687; 84742; 117840; 84662; 131113; 117817.	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
38. Chloride	16887006	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
39. Antimony	7440360	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
40. Arsenic	7440382	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
41. Cadmium	7440439	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
42. Chromium III (trivalent)	16065831	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
43. Chromium VI (hexavalent)	18540299	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
44. Copper	7440508	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
45. Lead	7439921	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Grab	6010C	20 ug/L	12	0.00088	12	0.00044
46. Mercury	7439976	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
47. Nickel	7440020	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
48. Selenium	7782492	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
49. Silver	7440224	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
50. Zinc	7440666	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
51. Iron	7439896	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1	Grab	6010C	20 ug/L	81.9	0.00598	81.9	0.00298
Other (describe):		<input checked="" type="checkbox"/>	<input type="checkbox"/>								

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)
		<input type="checkbox"/>	<input type="checkbox"/>								
		<input type="checkbox"/>	<input type="checkbox"/>								

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

<p><i>Step 1:</i> Do any of the metals in the influent exceed the effluent limits in Appendix III (i.e., the limits set at zero dilution)? Y <input checked="" type="radio"/> N <input type="radio"/></p> <p><i>Step 2:</i> 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?</p> <p>Metal: <u>Lead</u> DF: <u>157.9</u></p> <p>Metal: <u> </u> DF: <u> </u></p> <p>Metal: <u> </u> DF: <u> </u></p> <p>Metal: <u> </u> DF: <u> </u></p> <p>Etc.</p>	<p>If yes, which metals?</p> <p>Lead</p> <p>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)?</p> <p>Y <input type="radio"/> N <input checked="" type="radio"/> If Y, list which metals:</p>
---	--

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

<p>a) A description of the treatment system, including a schematic of the proposed or existing treatment system:</p> <p>Gasoline contaminated groundwater will be dewatered from Gasoline Contaminated Soil Excavation Area and pumped to Fractionization Tank. The water will then be pumped from inside fractionization tank through Bag Filters for removal of particulates and through Two Liquid Phase Granular Activated Carbon Units connected in series for treatment and removal of any gasoline compounds before being discharged to Catch Basin Storm Drain that drains to Powwow River. Sample ports for testing of water will be collected before and after carbon units to ensure that there are no exceedances of the EPA Limits for discharge to the surface water body.</p>	<p>Equalization tanks <input type="checkbox"/></p> <p>Bag filter <input checked="" type="checkbox"/></p> <p>GAC filter <input checked="" type="checkbox"/></p>
<p>b) Identify each applicable treatment unit (check all that apply):</p> <p>Frac. tank <input checked="" type="checkbox"/> Air stripper <input type="checkbox"/> Oil/water separator <input type="checkbox"/></p> <p>Chlorination <input type="checkbox"/> De-chlorination <input type="checkbox"/> Other (please describe):</p>	<p>Other (please describe):</p>

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 gpm Maximum flow rate of treatment system gpm
 Design flow rate of treatment system gpm

d) A description of chemical additives being used or planned to be used (attach MSDS sheets):
 No chemical additives are being used or planned to be used. Gasoline contaminated groundwater will be treated and captured on liquid phase granular activated carbon before discharged to the storm drain 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 <input type="checkbox"/>	Within facility (sewer) <input type="checkbox"/>	Storm drain <input checked="" type="checkbox"/>	Wetlands <input type="checkbox"/>	Other (describe): <input type="text"/>
------------------------------------	--	--	---	-----------------------------------	--

b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:
 Contaminated water from excavation are to fractionization tank to bag filters to granular activated carbon treatment/capture to storm drain to Powwow 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 discharges, 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:

e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 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.

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:	Former Gas Station, 99-101 Friend Street, Amesbury, MA
Operator signature:	
Printed Name & Title:	William A. Simmons, LSP, J.D.
Date:	5/30/13

B. Submission of NOI to EPA - All operators applying for coverage under this General Permit must submit a completed Notice of Intent (NOI) to EPA. Signed and completed NOI forms and attachments must be submitted to EPA-NE at:

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

or electronically mailed to NPDES.Generalpermits@epa.gov

or faxed to the EPA Office at 617-918-0505

If filling out the suggested NOI form electronically on EPA's website, the signature page must be signed and faxed or mailed to EPA at the fax number and/or address listed above.

1. Filing with the states - A copy of any NOI form filed with EPA-NE must also be filed with state agencies. The state agency may elect to develop a state specific form or other information requirements.

a) Discharges in Massachusetts - In addition to the NOI, permit applicants must submit copies of the State Application Form BRPWM 12, Request for General Permit coverage for the RGP. The application form and the Transmittal Form for Permit Application and Payment may be obtained from the Massachusetts Department of Environmental Protection (MassDEP) website at www.state.ma.us/dep. Municipalities are fee-exempt, but should send a copy of the transmittal form to that address for project tracking purposes. All applicants should keep a copy of the transmittal form and a copy of the application package for their records.

1) A copy of the NOI, the transmittal form, a copy of the check, and Form BRPWM 12 should be sent to:

Massachusetts Department of Environmental Protection
Division of Watershed Management
627 Main Street, 2nd floor
Worcester, MA 01608

2) A copy of the transmittal form and the appropriate fee should be sent to:

Massachusetts Department of Environmental Protection
P.O. Box 4062
Boston, MA 02111

Please note: Applicants for discharges in Massachusetts should note that under 310 CMR 40.000, *as a matter of state law*, the general permit only applies to discharges that are **not** subject to the

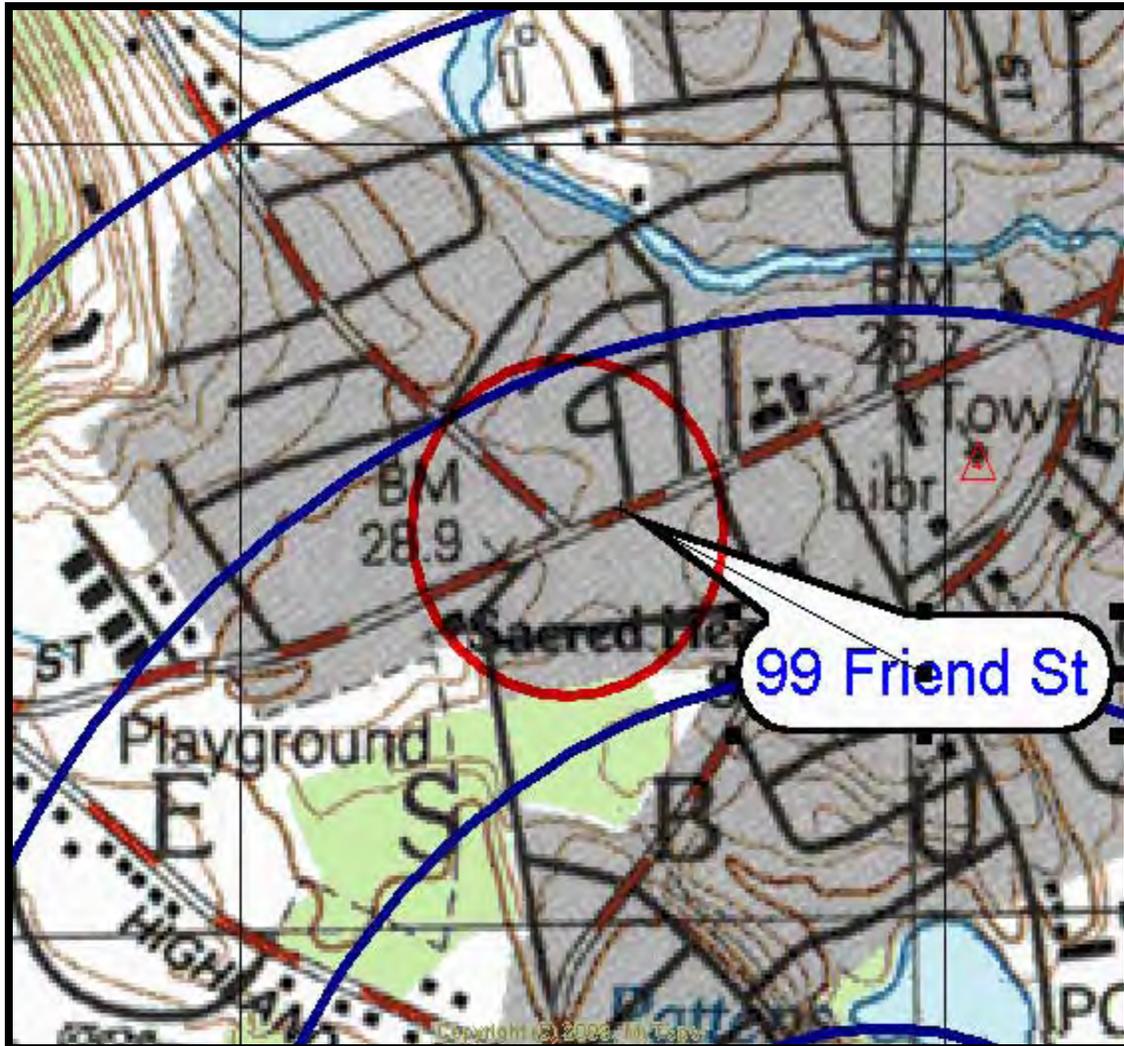
Massachusetts Contingency Plan (MCP) and 310 CMR 40.000. Therefore, discharges subject to the MCP are **not** required to fill out and submit the State Application Form BRPWM 12 or pay the state fees. However, they must submit a NOI to EPA.

b) Discharges in New Hampshire - applicants must provide a copy of the Notice of Intent to:

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

2. Filing with Municipalities - A copy of the NOI must be submitted to the municipality in which the proposed discharge would be located.

FIGURE 1 SITE LOCUS MAP



**99-101-103 FRIEND STREET
AMESBURY, MA**

QUADRANGLE: NEWBURYPORT, MA

LATITUDE: 42° 51' 31"

LONGITUDE: 70° 56' 39"

MAP SCALE: 1:25 000

UTM: 4 746 752N

341 153E

PROJECT #121003



*Powwow Villa
Housing*

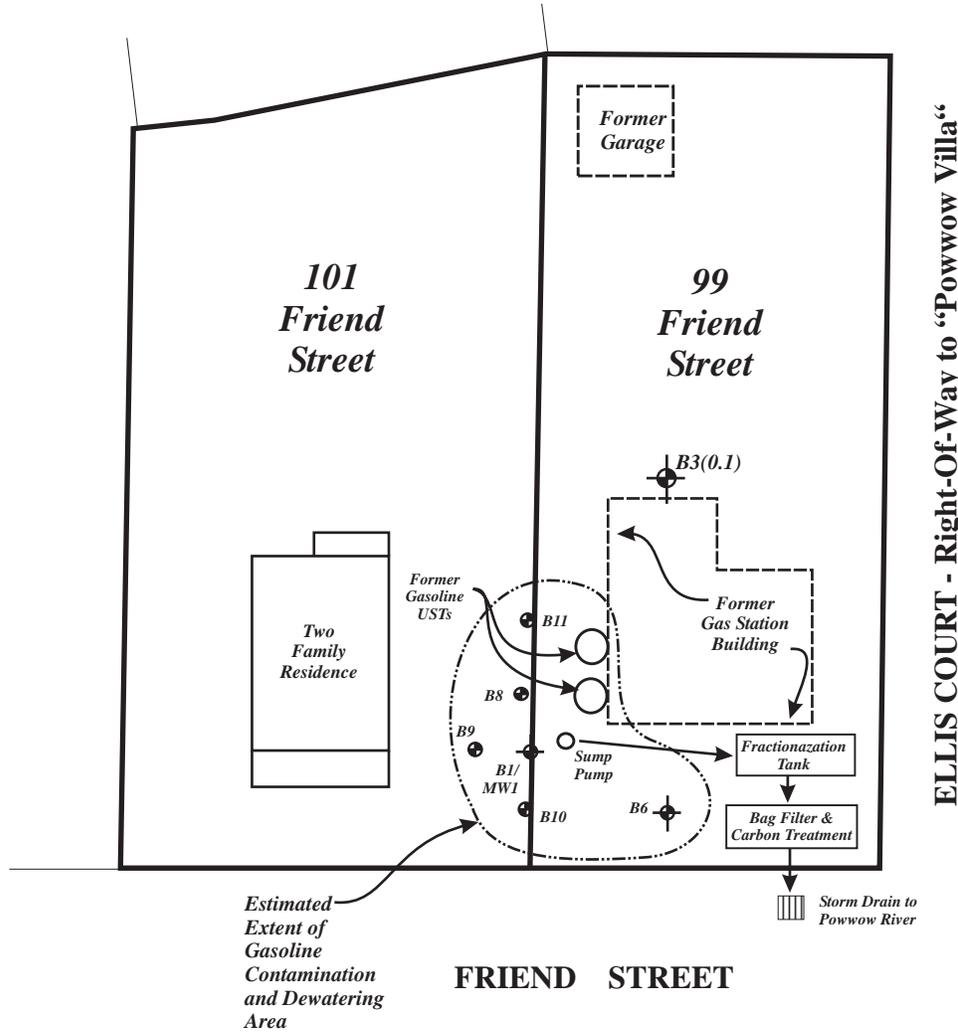


FIGURE 2 - DEWATERING SITE PLAN

For Properties At:

99 and 101

FRIEND STREET

AMESBURY, MA

Prepared By:

SIMMONS ENVIRONMENTAL SERVICES, INC.

213 Elm Street, Salisbury, MA 01952

(978) 463-6669

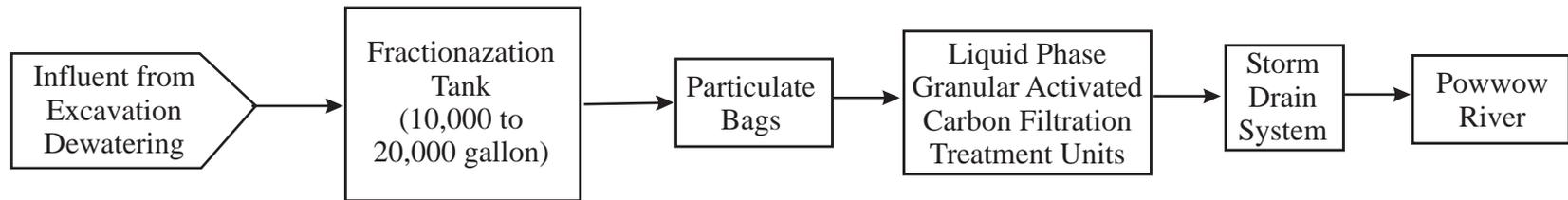
LEGEND

⊕ Boring Only

⊕ Boring / Well

Date: May 2013
Scale: 1" = 40'
Project #: 121003
Drafted: SHL

**FIGURE 3
PROCESS FLOW DIAGRAM
EXCAVATION DEWATERING SYSTEM**



99-101 FRIEND STREET, AMESBURY, MA

Prepared By:

SIMMONS ENVIRONMENTAL SERVICES, INC.

213 Elm Street, Salisbury, MA 01952

(978) 463-6669

Date: May-August 2013

Project #: 121003

Drafted: SHL

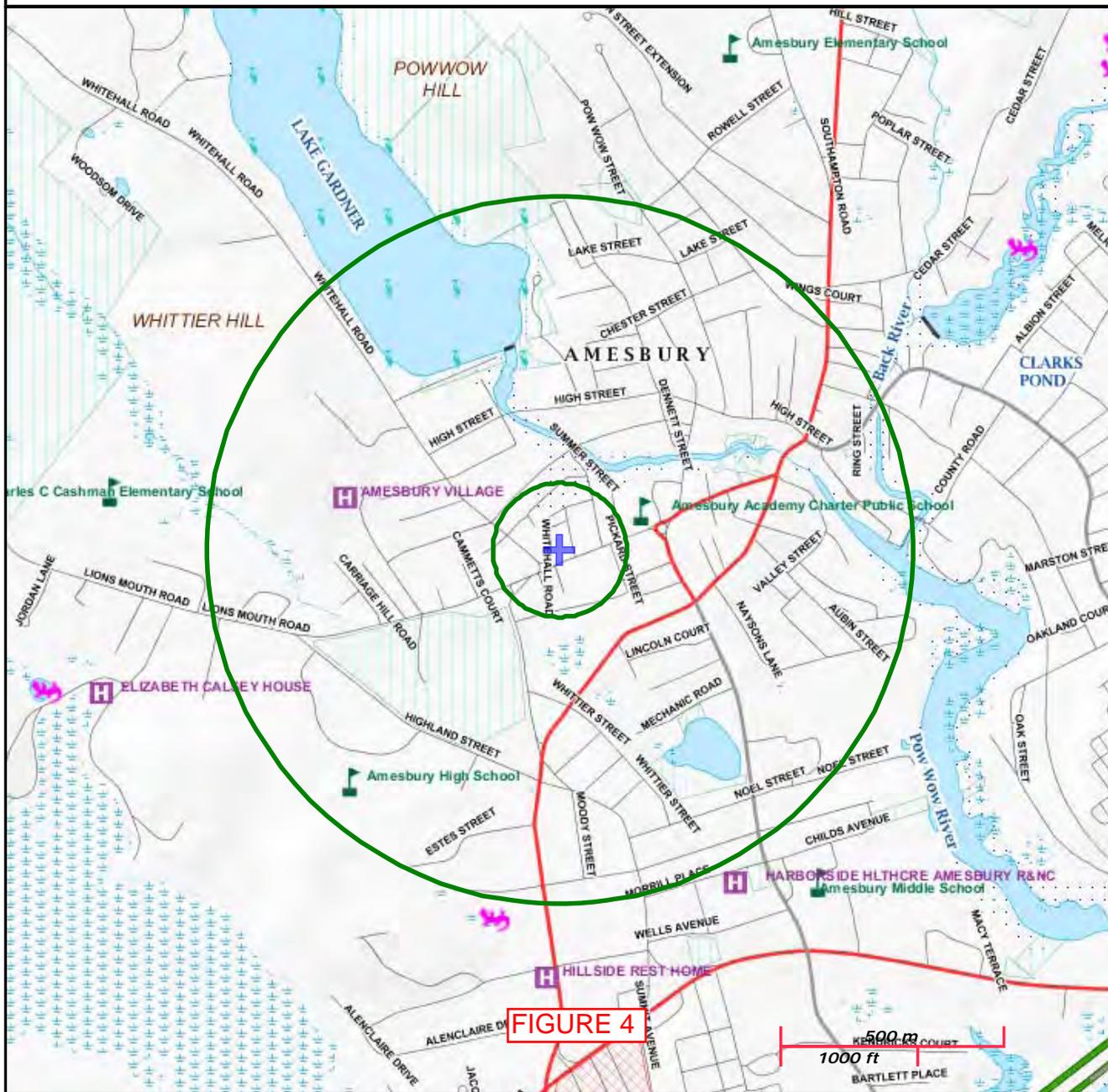
MassDEP - Bureau of Waste Site Cleanup

Site Information: MCP Numerical Ranking System Map: 500 feet & 0.5 Mile Radii

99-101 FRIEND STREET
99-101 FRIEND STREET AMESBURY, MA
3-000031433

NAD83 UTM Meters:
5290032mN , -7896658mE (Zone: 18)
May 24, 2013

The information shown is the best available at the date of printing. However, it may be incomplete. The responsible party and LSP are ultimately responsible for ascertaining the true conditions surrounding the site. Metadata for data layers shown on this map can be found at:
<http://www.mass.gov/mcjs/>



Roads: Limited Access, Divided, Other Hwy, Major Road, Minor Road, Track, Trail	PWS Protection Areas: Zone II, I/WPA, Zone A		
Boundaries: Town, County, DEP Region; Train; Powerline; Pipeline; Aqueduct	Hydrography: Open Water, PWS Reservoir, Tidal Flat		
Basins: Major, PWS; Streams: Perennial, Intermittent, Man Made Shore, Dam	Wetlands: Freshwater, Saltwater, Cranberry Bog		
Aquifers: Medium Yield, High Yield, EPA Sole Source	FEMA 100yr Floodplain; Protected Open Space; ACEC		
Non Potential Drinking Water Source Area: Medium, High (Yield)	Est. Rare Wetland Wildlife Hab; Vernal Pool: Cert., Potential		
	Solid Waste Landfill; PWS: Com.GW,SW, Emerg., Non-Com		



REPORT OF ANALYTICAL RESULTS

NETLAB Case Number Z0524-27

Prepared for:

Attn: William Simmons
Simmons Environmental
213 Elm Street
Salisbury, MA 01952

Report Date: May 28, 2013

Lab # RI010

NEW ENGLAND TESTING LABORATORY, INC.

1254 Douglas Avenue, North Providence, RI 02904

(401) 353-3420

MassDEP Analytical Protocol Certification Form

Laboratory Name: New England Testing Laboratory, Inc.

Project #: 121003

Project Location: 99-101 Friend Street

RTN:

This Form provides certifications for the following data set: list Laboratory Sample ID Number(s):
Z0524-27

Matrices: Groundwater/Surface Water Soil/Sediment Drinking Water Air Other:

CAM Protocol (check all that apply below):

8260 VOC CAM II A <input checked="" type="checkbox"/>	7470/7471 Hg CAM III B	MassDEP VPH CAM IV A	8081 Pesticides CAM V B	7196 Hex Cr CAM VI B	MassDEP APH CAM IX A
8270 SVOC CAM II B	7010 Metals CAM III C	MassDEP EPH CAM IV B	8151 Herbicides CAM V C	8330 Explosives CAM VIII A	TO-15 VOC CAM IX B
6010 Metals CAM III A <input checked="" type="checkbox"/>	6020 Metals CAM III D	8082 PCB CAM V A	9014 Total Cyanide/PAC CAM VI A	6860 Perchlorate CAM VIII B	Other <input checked="" type="checkbox"/>

Affirmative Responses to Questions A through F are required for "Presumptive Certainty" status

A	Were all samples received in a condition consistent with those described on the Chain-of-Custody, properly preserved (including temperature) in the field or laboratory, and prepared/analyzed within method holding times?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B	Were the analytical method(s) and all associated QC requirements specified in the selected CAM protocol(s) followed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C	Were all required corrective actions and analytical response actions specified in the selected CAM protocol(s) implemented for all identified performance standard non-conformances?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D	Does the laboratory report comply with all the reporting requirements specified in CAM VII A, "Quality Assurance and Quality Control Guidelines for the Acquisition and Reporting of Analytical Data"?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E	VPH, EPH, APH, and TO-15 only: a. VPH, EPH, and APH Methods only: Was each method conducted without significant modification(s)? (Refer to the individual method(s) for a list of significant modifications). b. APH and TO-15 Methods only: Was the complete analyte list reported for each method?	Yes No Yes No
F	Were all applicable CAM protocol QC and performance standard non-conformances identified and evaluated in a laboratory narrative (including all "No" responses to Questions A through E)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Responses to Questions G, H and I below are required for "Presumptive Certainty" status

G	Were the reporting limits at or below all CAM reporting limits specified in the selected CAM protocol(s)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ¹
----------	---	--

Data User Note: Data that achieve "Presumptive Certainty" status may not necessarily meet the data usability and representativeness requirements described in 310 CMR 40. 1056 (2)(k) and WSC-07-350.

H	Were all QC performance standards specified in the CAM protocol(s) achieved?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ¹
I	Were results reported for the complete analyte list specified in the selected CAM protocol(s)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ¹

¹All negative responses must be addressed in an attached laboratory narrative.

I, the undersigned, attest under the pains and penalties of perjury that, based upon my personal inquiry of those responsible for obtaining the information, the material contained in this analytical report is, to the best of my knowledge and belief, accurate and complete.

Signature: 

Position: Laboratory Director

Printed Name: Richard Warila

Date: 5/28/2013

SAMPLES SUBMITTED and REQUEST FOR ANALYSIS:

The samples listed in Table I were submitted to New England Testing Laboratory on May 24, 2013. The group of samples appearing in this report was assigned an internal identification number (case number) for laboratory information management purposes. The client's designations for the individual samples, along with our case numbers, are used to identify the samples in this report. This report of analytical results pertains only to the sample(s) provided to us by the client which are indicated on the custody record. The case number for this sample submission is Z0524-27.

Custody records are included in this report.

Site: 99-101 Friend Street

TABLE I, Samples Submitted

Sample ID	Date Sampled	Matrix	Analysis Requested
MW1	5/22/13	Water	Table II

TABLE II, Analysis and Methods

ANALYSIS	DETERMINATIVE METHOD
Oil & Grease SGT	1664A
Total Suspended Solids	2540D
Volatile Organic Compounds	8260B
Total Metals	
Iron	6010C
Lead	6010C
Dissolved Metals	
Iron	6010C
Lead	6010C

These methods are documented in:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, USEPA/OSW.

CASE NARRATIVE:

Sample Receipt

All samples were found to be properly preserved/cooled upon receipt. All analyses were performed within EPA designated holding-times. Procedure/calibration checks required by the designated protocols were within control limits.

Metals

All analyses were performed according to NETLAB's documented Standard Operating Procedures, within all required holding times, and with appropriate quality control measures. All QC was within laboratory established acceptance criteria. The samples were received, processed, and reported with no anomalies.

The sample for dissolved metals were filtered upon receipt to the laboratory.

Volatile Organic Compounds

All samples were analyzed within method specified holding times and according to NETLAB's documented standard operating procedures. The results for the associated calibration, method blank and laboratory control sample (LCS) were within method specified quality control criteria.

Wet Chemistry

All samples were analyzed within method specified holding times and according to NETLAB's documented standard operating procedures.

MW1

Parameter	Result, mg/l	Reporting Limit	Date Analyzed
Oil & Grease SGT	6	2	5/28/13
Total Suspended Solids	689	5	5/28/13
Total Metals			
Iron	81.9	0.25	5/28/13
Lead	0.012	0.005	5/28/13
Dissolved Metals			
Iron	71.6	0.05	5/28/13
Lead	0.011	0.005	5/28/13

ND = Not Detected

RESULTS: VOLATILE ORGANIC COMPOUNDS

The presence of the NETLAB LOGO in the top right corner of each page in this section indicates:

The Technical Manager of the Organics Analysis Department certifies that the samples included in this section have been prepared and analyzed using the procedures cited and that the results have been reviewed and approved. Any exceptions or qualifications of substance have been reported in the case narrative.

VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
 Method: 8260 Lab Sample ID: MW1
 Matrix: (soil/water) WATER Lab File ID: C052809.D
 Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
 % Moisture _____ Date Analyzed: 5/28/2013
 Soil Extract Volume: _____ (uL) Dilution Factor: 1,100
 Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
75-01-4	Vinyl Chloride	1.0	U
74-83-9	Bromomethane	1.0	U
75-00-3	Chloroethane	1.0	U
67-64-1	Acetone	5.0	U
75-35-4	1,1-Dichloroethene	1.0	U
75-15-0	Carbon Disulfide	1.0	U
75-09-2	Methylene Chloride	1.0	U
1634-04-4	tert-Butyl methyl ether	1.0	U
156-60-5	trans-1,2 Dichloroethene	1.0	U
75-34-3	1,1-Dichloroethane	1.0	U
78-93-3	2-Butanone	5.0	U
594-20-7	2,2-Dichloropropane	1.0	U
156-59-2	cis-1,2-Dichloroethene	1.0	U
67-66-3	Chloroform	1.0	U
74-97-5	Bromochloromethane	1.0	U
71-55-6	1,1,1-Trichloroethane	1.0	U
563-58-6	1,1-Dichloropropene	1.0	U
56-23-5	Carbon Tetrachloride	1.0	U
71-43-2	Benzene	150	
107-06-2	1,2-Dichloroethane	1.0	U
79-01-6	Trichloroethene	1.0	U
78-87-5	1,2-Dichloropropane	1.0	U
75-27-4	Bromodichloromethane	1.0	U
74-95-3	Dibromomethane	1.0	U
108-10-1	4-Methyl-2-pentanone	5.0	U
106-93-4	Ethylene Dibromide	1.0	U
10061-01-5	cis-1,3-Dichloropropene	1.0	U
108-88-3	Toluene	2000	
10061-02-6	Trans-1,3-Dichloropropene	1.0	U
79-00-5	1,1,2-Trichloroethane	1.0	U
591-78-6	2-Hexanone	5.0	U
127-18-4	Tetrachloroethene	1.0	U
124-48-1	Chlorodibromomethane	1.0	U
108-90-7	Chlorobenzene	1.0	U
630-20-6	1,1,1,2-Tetrachloroethane	1.0	U

U=not detected, D=diluted, E=over range (another data sheet is included), J=below limit, B=found in blank

New England Testing Laboratory, Inc.

VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
 Method: 8260 Lab Sample ID: MW1
 Matrix: (soil/water) WATER Lab File ID: C052809.D
 Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
 % Moisture _____ Date Analyzed: 5/28/2013
 Soil Extract Volume: _____ (uL) Dilution Factor: 1,100
 Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
100-41-4	Ethylbenzene	3400	
1330-20-7	m & p-Xylene	14000	
95-47-6	o-Xylene	6200	
100-42-5	Styrene	1.0	U
75-25-2	Bromoform	1.0	U
98-82-8	Isopropylbenzene	120	
79-34-5	1,1,2,2-Tetrachloroethane	1.0	U
108-86-1	Bromobenzene	1.0	U
96-18-4	1,2,3-Trichloropropane	1.0	U
95-49-8	2-Chlorotoluene	1.0	U
103-65-1	n-Propylbenzene	310	
108-67-8	1,3,5-Trimethylbenzene	750	
106-43-4	4-Chlorotoluene	1.0	U
98-06-6	tert-Butylbenzene	1.0	U
95-63-6	1,2,4-Trimethylbenzene	2900	
135-98-8	sec-Butylbenzene	15	
99-87-6	p-Isopropyltoluene	40	
74-87-3	Chloromethane	1.0	U
75-65-0	tert butyl alcohol	1.0	U
541-73-1	1,3-Dichlorobenzene	1.0	U
109-99-9	Tetrahydrofuran	1.0	U
106-46-7	1,4-Dichlorobenzene	1.0	U
60-29-7	Diethyl Ether	1.0	U
104-51-8	n-Butylbenzene	33	
95-50-1	1,2-Dichlorobenzene	1.0	U
96-12-8	1,2-Dibromo-3-chloropropane	1.0	U
120-82-1	1,2,4-Trichlorobenzene	1.0	U
87-68-3	Hexachlorobutadiene	1.0	U
91-20-3	Naphthalene	580	
87-61-6	1,2,3-Trichlorobenzene	1.0	U
994-05-8	Tert-amyl Methyl Ether	1.0	U
75-71-8	Dichlorodifluoromethane	1.0	U
142-28-9	1,3-Dichloropropane	1.0	U
75-69-4	Trichlorofluoromethane	1.0	U
637-92-3	Ethyl Tert-butyl ether	1.0	U

U=not detected, D=diluted, E=over range (another data sheet is included), J=below limit, B=found in blank

New England Testing Laboratory, Inc.



VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
Method: 8260 Lab Sample ID: MW1
Matrix: (soil/water) WATER Lab File ID: C052809.D
Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
% Moisture _____ Date Analyzed: 5/28/2013
Soil Extract Volume: _____ (uL) Dilution Factor: 1,100
Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
108-20-3	Diisopropyl Ether	1.0	U
123-91-1	1,4-Dioxane	250	U

U=not detected, D=diluted, E=over range (another data sheet is included), J=below limit, B=found in blank

New England Testing Laboratory, Inc.

VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
 Method: 8260 Lab Sample ID: VBLK052813
 Matrix: (soil/water) WATER Lab File ID: C052806.D
 Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
 % Moisture _____ Date Analyzed: 5/28/2013
 Soil Extract Volume: _____ (uL) Dilution Factor: 1.0
 Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
75-01-4	Vinyl Chloride	1.0	U
74-83-9	Bromomethane	1.0	U
75-00-3	Chloroethane	1.0	U
67-64-1	Acetone	5.0	U
75-35-4	1,1-Dichloroethene	1.0	U
75-15-0	Carbon Disulfide	1.0	U
75-09-2	Methylene Chloride	1.0	U
1634-04-4	tert-Butyl methyl ether	1.0	U
156-60-5	trans-1,2 Dichloroethene	1.0	U
75-34-3	1,1-Dichloroethane	1.0	U
78-93-3	2-Butanone	5.0	U
594-20-7	2,2-Dichloropropane	1.0	U
156-59-2	cis-1,2-Dichloroethene	1.0	U
67-66-3	Chloroform	1.0	U
74-97-5	Bromochloromethane	1.0	U
71-55-6	1,1,1-Trichloroethane	1.0	U
563-58-6	1,1-Dichloropropene	1.0	U
56-23-5	Carbon Tetrachloride	1.0	U
71-43-2	Benzene	1.0	U
107-06-2	1,2-Dichloroethane	1.0	U
79-01-6	Trichloroethene	1.0	U
78-87-5	1,2-Dichloropropane	1.0	U
75-27-4	Bromodichloromethane	1.0	U
74-95-3	Dibromomethane	1.0	U
108-10-1	4-Methyl-2-pentanone	5.0	U
106-93-4	Ethylene Dibromide	1.0	U
10061-01-5	cis-1,3-Dichloropropene	1.0	U
108-88-3	Toluene	1.0	U
10061-02-6	Trans-1,3-Dichloropropene	1.0	U
79-00-5	1,1,2-Trichloroethane	1.0	U
591-78-6	2-Hexanone	5.0	U
127-18-4	Tetrachloroethene	1.0	U
124-48-1	Chlorodibromomethane	1.0	U
108-90-7	Chlorobenzene	1.0	U
630-20-6	1,1,1,2-Tetrachloroethane	1.0	U

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New England Testing Laboratory, Inc.

VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
 Method: 8260 Lab Sample ID: VBLK052813
 Matrix: (soil/water) WATER Lab File ID: C052806.D
 Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
 % Moisture _____ Date Analyzed: 5/28/2013
 Soil Extract Volume: _____ (uL) Dilution Factor: 1.0
 Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
100-41-4	Ethylbenzene	1.0	U
1330-20-7	m & p-Xylene	2.0	U
95-47-6	o-Xylene	1.0	U
100-42-5	Styrene	1.0	U
75-25-2	Bromoform	1.0	U
98-82-8	Isopropylbenzene	1.0	U
79-34-5	1,1,2,2-Tetrachloroethane	1.0	U
108-86-1	Bromobenzene	1.0	U
96-18-4	1,2,3-Trichloropropane	1.0	U
95-49-8	2-Chlorotoluene	1.0	U
103-65-1	n-Propylbenzene	1.0	U
108-67-8	1,3,5-Trimethylbenzene	1.0	U
106-43-4	4-Chlorotoluene	1.0	U
98-06-6	tert-Butylbenzene	1.0	U
95-63-6	1,2,4-Trimethylbenzene	1.0	U
135-98-8	sec-Butylbenzene	1.0	U
99-87-6	p-Isopropyltoluene	1.0	U
74-87-3	Chloromethane	1.0	U
75-65-0	tert butyl alcohol	1.0	U
541-73-1	1,3-Dichlorobenzene	1.0	U
109-99-9	Tetrahydrofuran	1.0	U
106-46-7	1,4-Dichlorobenzene	1.0	U
60-29-7	Diethyl Ether	1.0	U
104-51-8	n-Butylbenzene	1.0	U
95-50-1	1,2-Dichlorobenzene	1.0	U
96-12-8	1,2-Dibromo-3-chloropropane	1.0	U
120-82-1	1,2,4-Trichlorobenzene	1.0	U
87-68-3	Hexachlorobutadiene	1.0	U
91-20-3	Naphthalene	1.0	U
87-61-6	1,2,3-Trichlorobenzene	1.0	U
994-05-8	Tert-amyl Methyl Ether	1.0	U
75-71-8	Dichlorodifluoromethane	1.0	U
142-28-9	1,3-Dichloropropane	1.0	U
75-69-4	Trichlorofluoromethane	1.0	U
637-92-3	Ethyl Tert-butyl ether	1.0	U

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New England Testing Laboratory, Inc.



VOLATILE ORGANICS ANALYSIS DATA SHEET

Case No.: Z0524-27 Client Name: Simmons Environmental
Method: 8260 Lab Sample ID: VBLK052813
Matrix: (soil/water) WATER Lab File ID: C052806.D
Sample wt/vol: 1.0 (g/ml) ML Date Sampled: 5/22/2013
% Moisture _____ Date Analyzed: 5/28/2013
Soil Extract Volume: _____ (uL) Dilution Factor: 1.0
Analyst's Initials: JD Soil Aliquot Volume: _____ (uL)

CAS NO.	COMPOUND	UNITS: <u>ug/L</u>	Q
108-20-3	Diisopropyl Ether	1.0	U
123-91-1	1,4-Dioxane	250	U

U=not detected, D=diluted, E=over range (another data sheet is included), J=below limit, B=found in blank

New England Testing Laboratory, Inc.

WATER VOLATILE SYSTEM MONITORING COMPOUND RECOVERY

Lab Name: New England Testing Lab Contract: 99-101 Friend Str
 Lab Code: RI010 Case No.: Z0524-27 SAS No.: _____ SDG No.: Simmons

	EPA SAMPLE NO.	SMC1 #	SMC2 #	SMC3 #	TOT OUT
01	VLCS052813	108	105	94	0
02	VBLK052813	107	110	100	0
03	MW1	103	91	79	0

QC LIMITS

SMC1	=	4-Bromofluorobenzene	(70-130)
SMC2	=	Toluene-D8	(70-130)
SMC3	=	1,2-Dichloroethane-D4	(70-130)

Column to be used to flag recovery values
 * Values outside of contract required QC limits
 D System Monitoring Compound diluted out

New England Testing Laboratory, Inc.

Volatile Organics Laboratory Control Spike

Date Analyzed: 05/28/2013

Sample ID: VLCS052813

Compound	Spike Added	Spike Result	Recovery, %	Lower Control Limit, %	Upper Control Limit, %
1,1-Dichloroethene	50.0	54.4	109	70	129
Benzene	50.0	56.9	114	73	129
Trichloroethene	50.0	56.1	112	77	122
Toluene	50.0	56.5	113	75	123
Chlorobenzene	50.0	46.1	92	73	125

20524-27

NEW ENGLAND TESTING LABORATORY, INC.
 1254 Douglas Avenue
 North Providence, RI 02904
 1-888-863-8522

CHAIN OF CUSTODY RECORD

PROJ. NO.	PROJECT NAME/LOCATION		DATE	TIME	C O M P	G R A B	SAMPLE I.D.	A C C E S S	S O I L	O T H E R	NO. OF CONTAINERS	PRESERVATIVE	TESTS**	REMARKS
	REPORT TO:	INVOICE TO:												
12003	99-101 Friend Street Simmans Environmental 213 Elm Street, Salisbury, MA		5/23/13	2:30			MW1	✓			3 UCan	Met/ice	✓	
			5/23/13	2:30			MW1	✓			3 Lites	Met/ice	✓	
			5/23/13	2:30			MW1	✓			3 PL plastic	Met/ice	✓	
<p>REPORT TO: Stephen Leady</p> <p>INVOICE TO: Simmans</p> <p>TESTS** UDCS 8260 TPA 1649 total suspended solids total lead & iron water for analysis</p>														
<p>Special Instructions: List Specific Detection Limit Requirements: Phase 1 MCA procedure water sampler for lead + 1 regular lab asap 24 hours 24 hour rush Turnaround (Business Days)</p>														
<p>Laboratory Remarks: Temp. received: 5°C Cooled <input type="checkbox"/></p>														
<p>Received by: (Signature) <i>Steph Leady</i> Date/Time 5/23/13</p> <p>Received by: (Signature) <i>Robert Rue</i> Date/Time 5/23/13 10:00</p> <p>Received for Laboratory by: (Signature) <i>Robert Rue</i> Date/Time 5/24/13 14:45</p>														

**Netlab subcontractors the following tests: Radiologicals, Radon, Asbestos, UCMFRs, Perchlorate, Bromate, Bromide, Sieve, Salmonella, Carbamates