



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

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

CERTIFIED MAIL RETURN RECEIPT REQUESTED

MAY 08 2014

Dan Galante
Vice President
T. Ford Company
118 Tenney Street
Georgetown, MA 01833

Re: Authorization to discharge under the Remediation General Permit (RGP) –
MAG910000. Circle finishing site located at 3 Newburyport Turnpike, Newbury, MA
01950: Authorization # MAG910615

Dear Mr. Galante:

Based on the review of a Notice of Intent (NOI) submitted by Mr. Allen Walker from the firm ARCADIS U.S., Inc., on behalf of T. Ford Company, 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 total metal parameters that exceeded Appendix III limits. Also, per your consultant's agreement with this office, the checklist includes parameters conforming the activity sub-category (primarily heavy metals) selected, in lieu of missing laboratory information.

Also, please note that the metals included on the checklist are dilution dependent pollutants and subject to discharge limitations based on a dilution factor range (DFR). With the limited dilution at the mitigating wetland, 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 limit for antimony of 5.6 ug/L, arsenic of 10 ug/L, Cadmium of 0.2 ug/L, trivalent chromium of 48.8 ug/L, hexavalent chromium of 11.4 ug/L, copper of 5.2 ug/L, lead of 1.3 ug/L, Mercury of 0.9 ug/L, nickel of 29 ug/L, selenium of 5 ug/L, silver of 1.2 ug/L, zinc of 66.6 ug/L, and 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 months. A recertification can be submitted to EPA within six (6) to twelve (12) months of operations in accordance with the 2010 RGP regulations.

This general permit and authorization to discharge will expire on September 9, 2015. You have reported that this project will terminate on May 21, 2014. 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
Timothy Leonard Sr., Town of Newbury, DPW
Donna D. Holaday, City of Newburyport, City Mayor
Allen Walker, ARCADIS U.S., Inc.

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

NPDES Authorization Number:	MAG910615
Authorization Issued:	May 1, 2014
Facility/Site Name:	Circle Finishing
Facility/Site Address:	3 Newburyport Turnpike, MA 01950
	Email address of owner: rdlcircle@aol.com
Legal Name of Operator:	T. Ford Company
Operator contact name, title, and Address:	Dan Galante 118 Tenney Street, Georgetown, MA 01833
	Email: Same as the owner
Estimated date of The Project Completion:	May 21, 2014
Category and Sub-Category:	Category II- Non Petroleum Site Remediation. Sub-category C. Primarily Heavy Metals Sites.
RGP Termination Date:	September 9, 2015
Receiving Water:	Wetland

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

	<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)
	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/ML 5ug/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/ML 5ug/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		Minimum level=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.
- 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.



ARCADIS U.S., Inc.
194 Forbes Road
Braintree
Massachusetts 02184
Tel 781 356 7300
Fax 781 356 2211
www.arcadis-us.com

Mr. Victor Alvarez
U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, Massachusetts 02109-3912
Attn: Remediation General Permit NOI Processing

Environmental

Subject: Notice of Intent
NPDES Remediation General Permit
Circle Finishing Inc. Upland and Wetland Area Remediation
3 Newburyport Turnpike
Newbury, Massachusetts

Date:
April 15, 2014

Dear Mr. Alvarez:

Contact:
Allen Walker

On behalf of T Ford Company, Inc. (TFord), contractor implementing the work, ARCADIS U.S., Inc. (ARCADIS) has prepared this Notice of Intent (NOI) for coverage under the National Pollutant Discharge Elimination System (NPDES) Remediation General Permit (RGP), Massachusetts General Permit (MAG910000). This NOI was prepared in accordance with the general requirements of the NPDES and related guidance documentation provided by the US Environmental Protection Agency (EPA). The completed NOI form is provided in **Appendix A**.

Phone:-
781.356.7300 X261

Email:
Allen.Walker@arcadis-us.com

Our ref:
BN012703.0005

Site Information

This NOI has been prepared for the management of water generated from dewatering at a wetland sediment removal project, which includes the removal, transportation and disposal of contaminated sediment at the former Circle Finishing, Inc. metal plating facility property in Newbury and Newburyport, Massachusetts (the Site). On December 20, 1993 a fire occurred at the Site that resulted in a release of oil and/or hazardous materials (OHM) to the environment with fire-fighting water carrying OHM into the adjacent wetland.

The Site consists of approximately 1.7 acres located immediately south of the traffic circle on US Route 1 and is located in the towns of Newbury and Newburyport as identified on the Town of Newburyport Tax Assessor's Map 34 as Lot 1 and the Town of Newbury Tax Assessor's Map R-47 as Lots 38 and 39, though all work is proposed within the Town of Newbury, as seen in the attached figures. The topography of the land is relatively level and includes a wetland area to the east. The former site building has been razed (see attached **Figure 1**).

Imagine the result

Work Summary and Description

The applicant proposes to excavate and remove contaminated sediment and soil within upland and wetland areas of the site. At this time it is estimated that between 250-400 cubic yards of soil/sediment are proposed to be removed from the site based upon extensive soil testing conducted by ARCADIS over a period of several years. Excavation is expected to generally extend from a few inches to 1.5 feet in depth in wetland areas. In areas with significant clay underlying the contaminated soil or sediment, 1 to 3 inches of this clay may also be removed. Contaminated material is expected to be taken to Waste Management's Turnkey Landfill in Rochester, NH, pending final characterization testing following excavation.

Work within wetlands is expected to be conducted primarily from equipment operating from 4 x 20 foot timber mats ("swamp mats"). There may be wetland areas which are stable enough for tracked vehicles to operate safely without mats. Upon removal of material, clean soil (clean sandy loam containing a minimum 20% organic matter content) will be replaced on site to approximate pre-excavation grades. The edges of the wetland will be re-planted with herbaceous, native vegetation and the buffer zone will be seeded with a grass.

This work requires dewatering within the wetland excavation so that work can be completed in dry conditions. Water generated from the excavation will be handled in accordance with a best management practices (BMPs) plan included in **Appendix B**, which was included as part of the Water Quality Certificate that was submitted to the Massachusetts Department of Environmental Protection (MassDEP). Additional information and design detail for the water treatment system and can be found in the attached figures. The project activity is expected to last approximately 4 weeks.

To characterize water from the excavation, ARCADIS utilized laboratory analytical data from surface water samples collected at the Site in 2012. Historical analytical data from surface water samples collected at the Site were also reviewed for comparison of historical and current concentration trends. These samples were analyzed for the parameters specified for this RGP NOI. Laboratory data reports for the more recent sampling data are provided in **Appendix C**.

Discharge and Receiving Surface Water Information

Based on analytical results of surface water samples collected by ARCADIS, there are detectable concentrations of metals that slightly exceeded the discharge concentration criteria. While it is unknown whether total suspended solids (TSS) concentrations will exceed the discharge criteria, TSS is expected to be significantly

reduced via settling that is expected in the influent equalization tank and also by the filtration that occurs as part of the surface water treatment system. Residual metals are expected to be reduced by the filtration. Refer to **Figure 2** for a proposed wetland excavation area and water treatment system layout.

Calculation of Dilution Criteria

For applications in Massachusetts, the following formula is used to calculate site specific dilution criteria:

$$DF = (Q_d + Q_s)/Q_d$$

DF = Dilution Factor

Q_d = Maximum flow rate of the discharge in cubic feet per second (cfs)

Q_s = Receiving water 7Q10 flow (cfs) where 7Q10 is the minimum flow for seven consecutive days with a reoccurrence interval of 10 years

The value for Q_d is the maximum expected flow rate of discharge from the proposed treatment system, which is approximately 50 gpm or 0.111 cfs. The value for Q_s was estimated using field observations, as the discharge is not continuous throughout the year and water levels can be too low for discharge to occur. The mean 7Q10 for the discharge was calculated at 0.0 cfs. Using this Q for Q_s provides a Dilution Factor of 1.

Consultation with Federal Services

ARCADIS reviewed online electronic data viewers and databases from the Massachusetts Geographical Information System (MassGIS) and the Massachusetts Division of Fisheries and Wildlife (MassWildlife; Natural Heritage and Endangered Species Program), the Massachusetts Historical Commission (MHC) and the U.S. National Parks Service Natural Historic Places (NPS). Based on this review, neither the Site nor the point where the proposed discharge reaches the receiving surface water body are Areas of Critical Environmental Concern (ACEC), Habitats of Rare Wetland Wildlife, Habitats of Rare Species or Estimated Habitats of Rare Wildlife or listed as a National Historic Place.

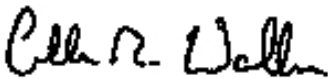
Coverage under NPDES RGP

It is our opinion that the proposed discharge is eligible for coverage under the NPDES RGP. On behalf of T Ford, we are requesting coverage under the NPDES RGP for the discharge of collected surface water during construction activities to the receiving stream adjacent and connected to the surface water body at the Site, a tributary of the Little River. The enclosed NOI form provides required information on the general site conditions, discharge, treatment system, receiving water, and consultation with federal services. For this project, T Ford has operational control over the construction plans and specifications, including the ability to make modifications to those plans and specifications.

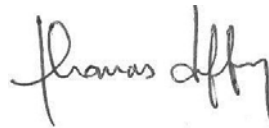
Please call us at (781) 356-7300, if you have any questions.

Sincerely,

ARCADIS U.S., Inc.



Allen Walker, PE, LSP
Principal Environmental Engineer



Thomas Duffy
Environmental Scientist II

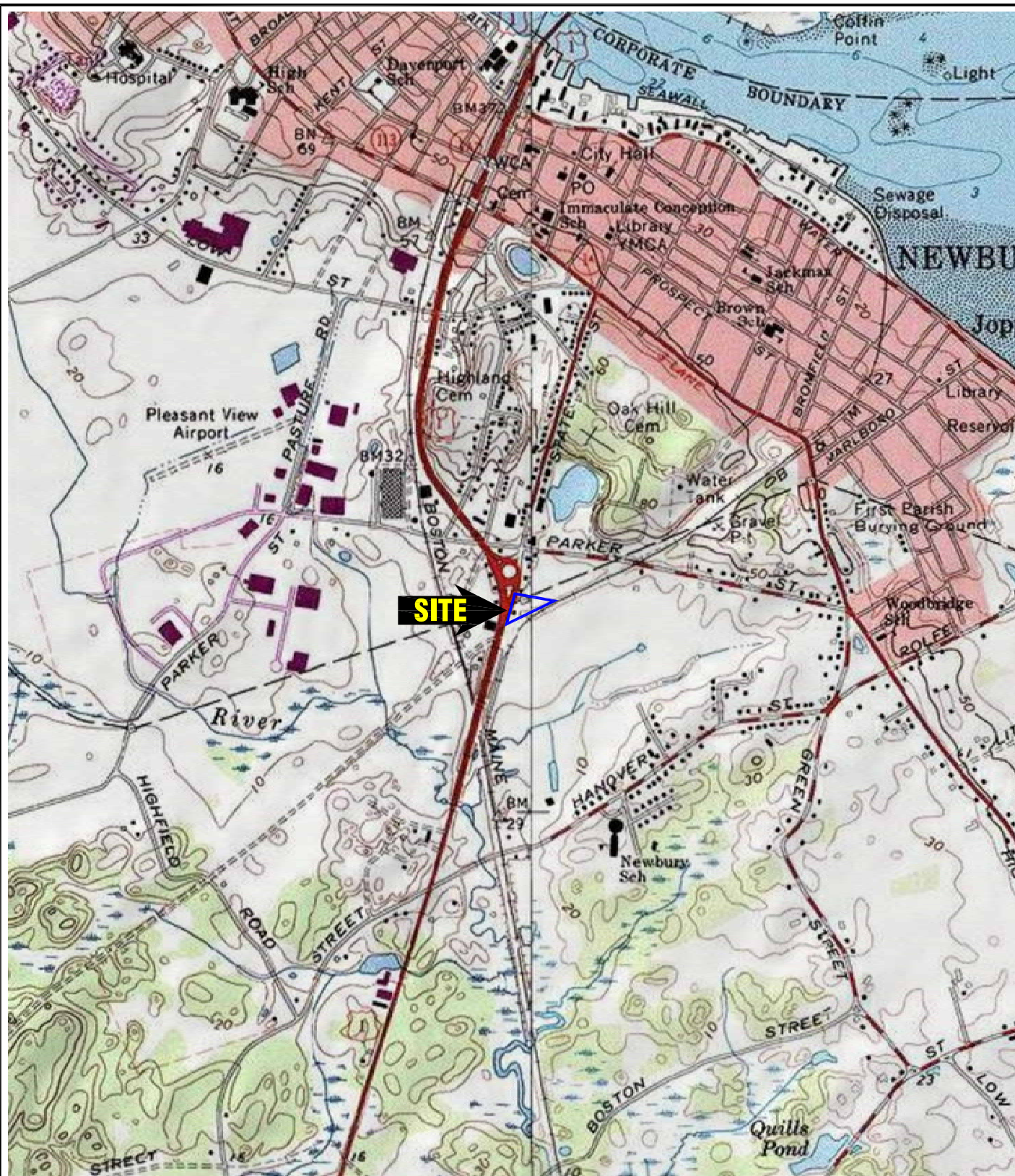
Attachments:

Figure 1 – Site Location Map
Figure 2 – Proposed Wetland and Soil Excavation Areas
Figure 3 – Discharge Area Detail
Schematic of Water Treatment System

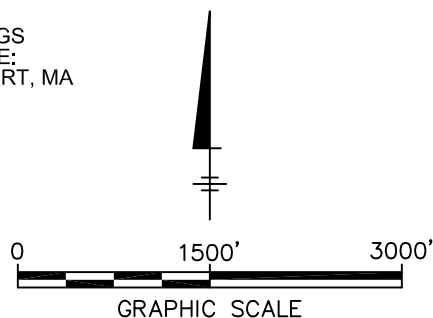
Appendix A – NOI Form
Appendix B – BMPs
Appendix C – 2012 Laboratory Data

Figures

CITY: MANCHESTER DIV/GROUP: ENVCAD DB: T.HALLIWELL PM: TM: SOURCE: USGS
 G:\ENVCAD\Manchester\ACT\BND1270300050000812703-801.dwg LAYOUT: 1 SAVED: 10/17/2013 1:00 PM ACADVER: 18.1S (LMS TECH) PAGES: 1 PLOTSETUP: 1 PLOTSTYLETABLE: 1 PLOTTED: 10/17/2013 1:03 PM BY: SMALL, BRIAN



SOURCE: USGS
 QUADRANGLE:
 NEWBURYPORT, MA
 DATED: 1987

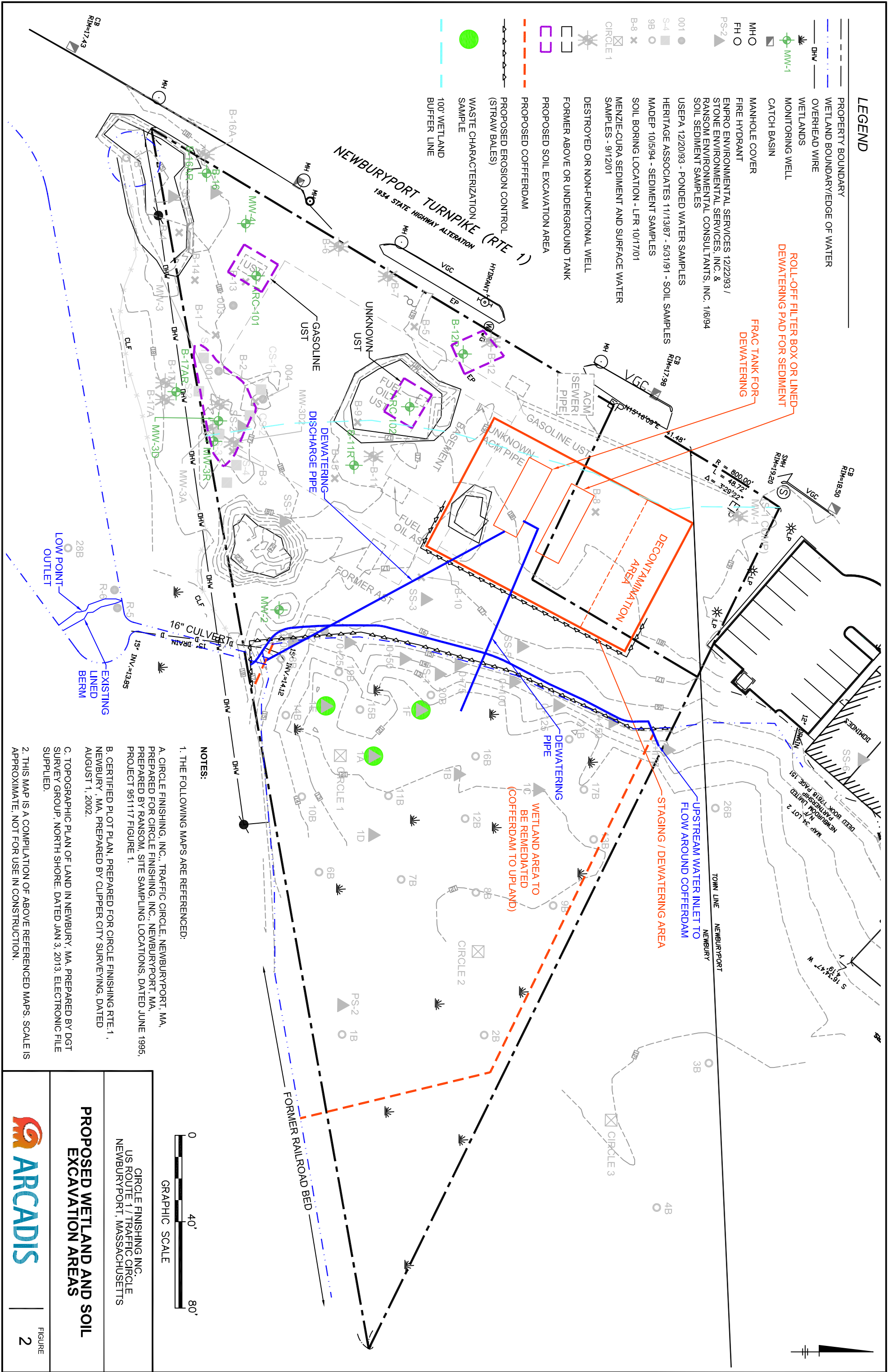


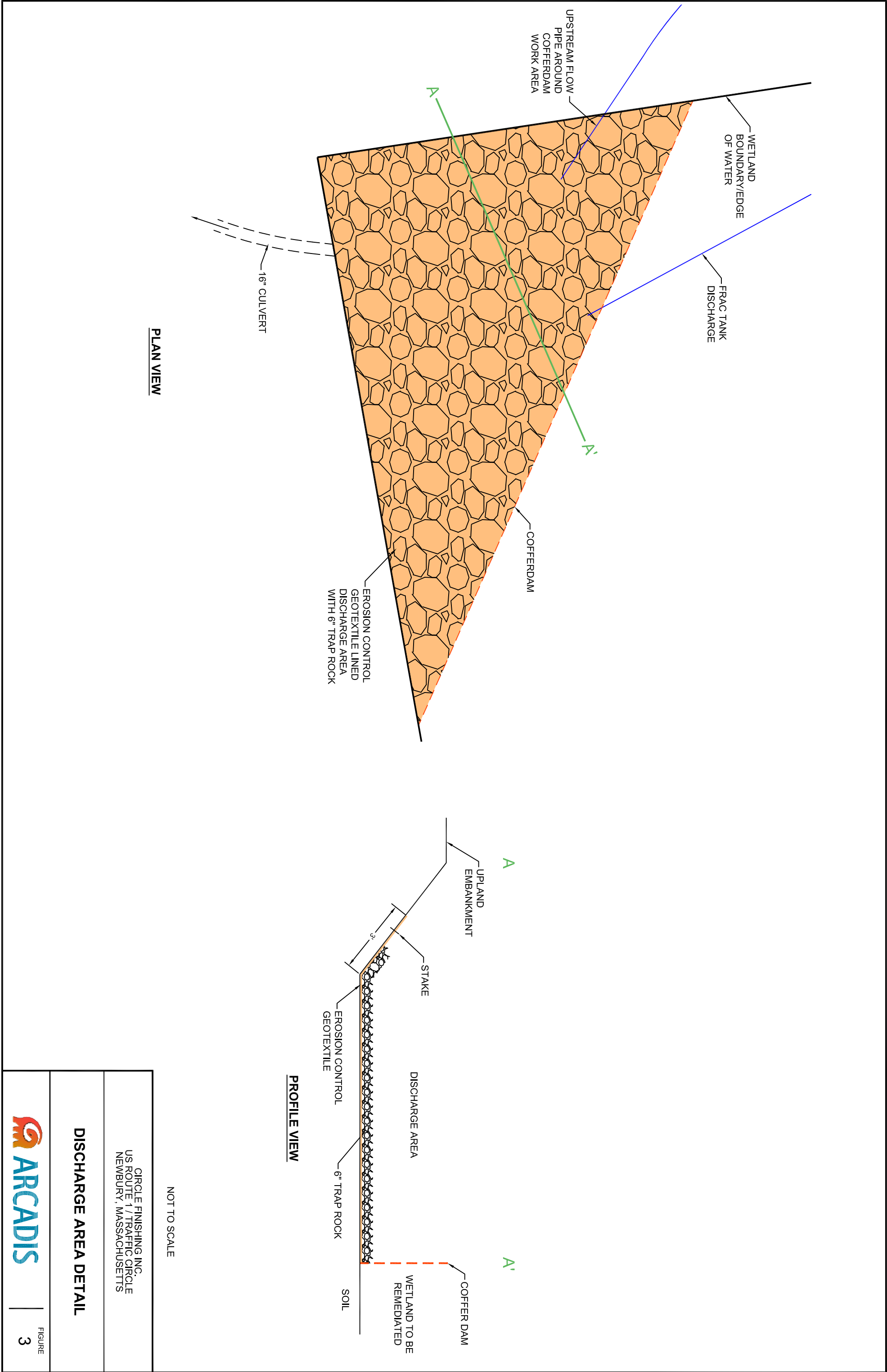
CIRCLE FINISHING INC.
 US ROUTE 1 / TRAFFIC CIRCLE
 NEWBURY, MASSACHUSETTS

SITE LOCATION MAP

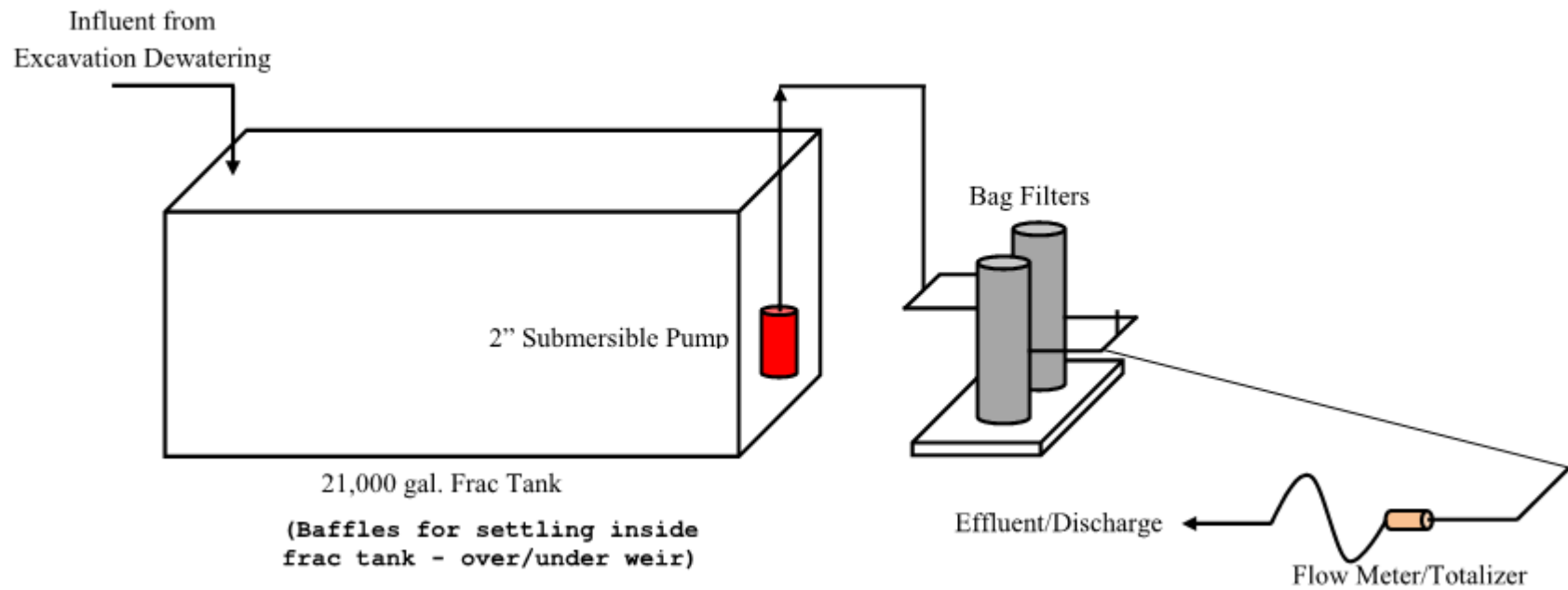


FIGURE
1





**Schematic of Water
Treatment System**



**Schematic of Water Treatment System
Dewatering of Wetland Area for Sediment Remediation
Circle Finishing, Inc., Newbury, MA
RTN 3-392**

Appendix A

NOI Form

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 : Circle Finishing		Facility/site mailing address:	
Location of facility/site :	Facility SIC code(s):	Street:	
longitude: -70.874592	3471	3 Newburyport Turnpike	
latitude: 42.797530			
b) Name of facility/site owner :		Town: Newbury	
Email address of facility/site owner:		State:	Zip:
rdlcircle@aol.com		MA	01950
Telephone no. of facility/site owner : 978-462-7171		County: US	
Fax no. of facility/site owner : 978-465-1631		Owner is (check one): 1. Federal <input type="radio"/> 2. State/Tribal <input type="radio"/>	
Address of owner (if different from site):		3. Private <input checked="" type="radio"/> 4. Other <input type="radio"/> if so, describe:	
		Circle Finishing, Inc.	
Street: 19 Graf Road			
Town: Newburyport	State: MA	Zip: 01950	County: US
c) Legal name of operator :		Operator telephone no: 978-352-5606	
T. Ford Company		Operator fax no.:	Operator email: dan@tford.com
Operator contact name and title:		Dan Galante	
Address of operator (if different from owner):		Street: 118 Tenney Street	
Town: Georgetown	State: MA	Zip: 01833	County: US

<p>d) Check Y for "yes" or N for "no" for the following:</p> <p>1. Has a prior NPDES permit exclusion been granted for the discharge? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 150px;" type="text"/></p> <p>2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, date and tracking #: <input style="width: 250px;" type="text"/></p> <p>3. Is the discharge a "new discharge" as defined by 40 CFR 122.2? Y <input checked="" type="radio"/> N <input type="radio"/></p> <p>4. For sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) and exempt from state permitting? Y <input checked="" type="radio"/> N <input type="radio"/></p>									
<p>e) Is site/facility subject to any State permitting, license, or other action which is causing the generation of discharge? Y <input checked="" type="radio"/> N <input type="radio"/></p> <p>If Y, please list:</p> <p>1. site identification # assigned by the state of NH or MA: <input style="width: 200px;" type="text" value="X258013"/></p> <p>2. permit or license # assigned: <input style="width: 150px;" type="text" value="103253"/></p> <p>3. state agency contact information: name, location, and telephone number:</p> <p><input style="width: 250px;" type="text" value="Mass. DEP - Northeast Region"/> <input style="width: 250px;" type="text" value="205 B Lowell Street"/> <input style="width: 250px;" type="text" value="Wilmington, MA 01887 attn: Nancy White 978-694-3359"/></p>	<p>f) Is the site/facility covered by any other EPA permit, including:</p> <p>1. Multi-Sector General Permit? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 100px;" type="text"/></p> <p>2. Final Dewatering General Permit? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 100px;" type="text"/></p> <p>3. EPA Construction General Permit? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 100px;" type="text"/></p> <p>4. Individual NPDES permit? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 100px;" type="text"/></p> <p>5. any other water quality related individual or general permit? Y <input type="radio"/> N <input checked="" type="radio"/>, if Y, number: <input style="width: 100px;" type="text"/></p>								
<p>g) Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y <input type="radio"/> N <input checked="" type="radio"/></p>									
<p>h) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%; text-align: left; padding: 5px;"><u>Activity Category</u></th> <th style="width: 60%; text-align: left; padding: 5px;"><u>Activity Sub-Category</u></th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">I - Petroleum Related Site Remediation</td> <td style="padding: 5px;"> A. Gasoline Only Sites <input 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"/> </td> </tr> <tr> <td style="padding: 5px;">II - Non Petroleum Site Remediation</td> <td style="padding: 5px;"> 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 checked="" type="checkbox"/> </td> </tr> <tr> <td style="padding: 5px;">III - Contaminated Construction Dewatering</td> <td style="padding: 5px;"> A. General Urban Fill Sites <input type="checkbox"/> B. Known Contaminated Sites <input type="checkbox"/> </td> </tr> </tbody> </table>		<u>Activity Category</u>	<u>Activity Sub-Category</u>	I - Petroleum Related Site Remediation	A. Gasoline Only Sites <input 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 checked="" type="checkbox"/>	III - Contaminated Construction Dewatering	A. General Urban Fill Sites <input type="checkbox"/> B. Known Contaminated Sites <input type="checkbox"/>
<u>Activity Category</u>	<u>Activity Sub-Category</u>								
I - Petroleum Related Site Remediation	A. Gasoline Only Sites <input 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 checked="" type="checkbox"/>								
III - Contaminated Construction Dewatering	A. General Urban Fill Sites <input type="checkbox"/> B. Known Contaminated Sites <input type="checkbox"/>								

IV - Miscellaneous Related Discharges	A. Aquifer Pump Testing to Evaluate Formerly Contaminated Sites <input type="checkbox"/> B. Well Development/Rehabilitation at Contaminated/Formely 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"/>
---------------------------------------	--

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 associated with the remediation of contaminated sediments within a wetland contaminated by a fire-related release in 1993.	
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 0.111 cfs Is maximum flow a design value ? Y <input type="radio"/> N <input checked="" type="radio"/> Average flow (include units) 0.067 cfs Is average flow a design value or estimate? Estimate
3) Latitude and longitude of each discharge within 100 feet:	
pt.1: lat 42.797966 long -70.872838	pt.2: lat. long. ;
pt.3: lat. long.	pt.4: lat. long. ;
pt.5: lat. long.	pt.6: lat. long. ;
pt.7: lat. long.	pt.8: lat. long. ; etc.
4) If hydrostatic testing, total volume of the discharge (gals): NA	5) Is the discharge intermittent <input checked="" type="radio"/> or seasonal <input type="radio"/> ? Is discharge ongoing? Y <input type="radio"/> N <input checked="" type="radio"/>
c) Expected dates of discharge (mm/dd/yy): start Apr 21, 2014 end May 21, 2014	
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 5 attached	

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.

<u>Parameter *</u>	<u>CAS Number</u>	<u>Believed Absent</u>	<u>Believed Present</u>	<u># of Samples</u>	<u>Sample Type (e.g., grab)</u>	<u>Analytical Method Used (method #)</u>	<u>Minimum Level (ML) of Test Method</u>	<u>Maximum daily value</u>		<u>Average daily value</u>	
								<u>concentration (ug/l)</u>	<u>mass (kg)</u>	<u>concentration (ug/l)</u>	<u>mass (kg)</u>
1. Total Suspended Solids (TSS)		<input type="checkbox"/>	<input checked="" type="checkbox"/>								
2. Total Residual Chlorine (TRC)		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
3. Total Petroleum Hydrocarbons (TPH)		<input checked="" type="checkbox"/>	<input type="checkbox"/>								
4. Cyanide (CN)	57125	<input type="checkbox"/>	<input checked="" type="checkbox"/>	19	GRAB	SW-846 9014	10	170	0.0463	170	0.0463
5. Benzene (B)	71432	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
6. Toluene (T)	108883	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
7. Ethylbenzene (E)	100414	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
8. (m,p,o) Xylenes (X)	108883; 106423; 95476; 1330207	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
9. Total BTEX ²	n/a	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
10. Ethylene Dibromide (EDB) (1,2-Dibromoethane) ³	106934	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
11. Methyl-tert-Butyl Ether (MtBE)	1634044	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
12. tert-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	<input checked="" type="checkbox"/>	<input type="checkbox"/>								

* 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.

<u>Parameter *</u>	<u>CAS Number</u>	<u>Believed Absent</u>	<u>Believed Present</u>	<u># of Samples</u>	<u>Sample Type (e.g., grab)</u>	<u>Analytical Method Used (method #)</u>	<u>Minimum Level (ML) of Test Method</u>	<u>Maximum daily value</u>		<u>Average daily value</u>	
								<u>concentration (ug/l)</u>	<u>mass (kg)</u>	<u>concentration (ug/l)</u>	<u>mass (kg)</u>
13. tert-Amyl Methyl Ether (TAME)	9940508	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
14. Naphthalene	91203	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
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"/>								

<u>Parameter *</u>	<u>CAS Number</u>	<u>Believed Absent</u>	<u>Believed Present</u>	<u># of Samples</u>	<u>Sample Type (e.g., grab)</u>	<u>Analytical Method Used (method #)</u>	<u>Minimum Level (ML) of Test Method</u>	<u>Maximum daily value</u>		<u>Average daily value</u>	
								<u>concentration (ug/l)</u>	<u>mass (kg)</u>	<u>concentration (ug/l)</u>	<u>mass (kg)</u>
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"/>								

⁴The sum of individual phthalate compounds.

<u>Parameter *</u>	<u>CAS Number</u>	<u>Believed Absent</u>	<u>Believed Present</u>	<u># of Samples</u>	<u>Sample Type (e.g., grab)</u>	<u>Analytical Method Used (method #)</u>	<u>Minimum Level (ML) of Test Method</u>	<u>Maximum daily value</u>		<u>Average daily value</u>	
								<u>concentration (ug/l)</u>	<u>mass (kg)</u>	<u>concentration (ug/l)</u>	<u>mass (kg)</u>
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 checked="" type="checkbox"/>	<input type="checkbox"/>								
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 type="checkbox"/>	<input checked="" type="checkbox"/>	18	GRAB	SW-846 6010C	4	ND	0	2	0.0005
42. Chromium III (trivalent)	16065831	<input type="checkbox"/>	<input checked="" type="checkbox"/>	26	GRAB	SW-846 6010C	10	32	0.0087	11	0.003
43. Chromium VI (hexavalent)	18540299	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2	GRAB						
44. Copper	7440508	<input type="checkbox"/>	<input checked="" type="checkbox"/>	26	GRAB	SW-846 6010C	10	430	0.1172	61	0.0166
45. Lead	7439921	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
46. Mercury	7439976	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
47. Nickel	7440020	<input type="checkbox"/>	<input checked="" type="checkbox"/>	26	GRAB	SW-846 6010C	10	300	0.0818	176	0.048
48. Selenium	7782492	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
49. Silver	7440224	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
50. Zinc	7440666	<input type="checkbox"/>	<input checked="" type="checkbox"/>	26	GRAB	SW-846 6010C	20	100	0.0273	33	0.009
51. Iron	7439896	<input checked="" type="checkbox"/>	<input type="checkbox"/>								
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="checkbox"/> N <input type="checkbox"/></p>	<p>If yes, which metals? Copper, nickel</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> <table border="1"> <tr> <td>Metal: Copper</td> <td>DF: 1</td> </tr> <tr> <td>Metal: Nickel</td> <td>DF: 1</td> </tr> <tr> <td>Metal:</td> <td>DF:</td> </tr> <tr> <td>Metal:</td> <td>DF:</td> </tr> </table> <p>Etc.</p>	Metal: Copper	DF: 1	Metal: Nickel	DF: 1	Metal:	DF:	Metal:	DF:	<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 checked="" type="checkbox"/> N <input type="checkbox"/> If Y, list which metals:</p> <p>Copper, nickel</p>
Metal: Copper	DF: 1								
Metal: Nickel	DF: 1								
Metal:	DF:								
Metal:	DF:								

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>Before the wetland sediment excavation is commenced, any standing water inside the cofferdam will be discharged downstream in two stages:</p> <p>(a) Initial drawdown of standing water in the wetland area will be conducted by pumping clear water downstream via the VRS and 15" culvert discharge pipe.</p> <p>(b) Following initial drawdown, any remaining standing water in the wetland excavation area will be collected by hose with a screen at the suction end and treated by directing the water through a weir tank with baffles that will allow for sediment settling and a bag/cartridge filter prior to discharge at the VRS.</p> <p>During the two-week sediment excavation period, crushed stone collection sumps will be created at low points in the remediation area and any water accumulating within the wetland area will be pumped to the weir tank and bag/cartridge filter prior to discharge through the VRS.</p>						
b) Identify each applicable treatment unit (check all that apply):	Frac. tank <input checked="" type="checkbox"/>	Air stripper <input type="checkbox"/>	Oil/water separator <input type="checkbox"/>	Equalization tanks <input type="checkbox"/>	Bag filter <input checked="" type="checkbox"/>	GAC filter <input type="checkbox"/>
	Chlorination <input type="checkbox"/>	De-chlorination <input type="checkbox"/>	Other (please describe): riprap velocity dissipator			

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 30 gpm Maximum flow rate of treatment system 50 gpm
Design flow rate of treatment system 50 gpm

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

None planned.

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 type="checkbox"/>	Wetlands <input checked="" type="checkbox"/>	Other (describe): <div></div>
------------------------------------	--	--	--------------------------------------	--	----------------------------------

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

Discharge is back to same wetland as dewatering location, near its outlet under the existing MBTA rail right-of-way. Site is tributary to Little River.

c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water:

- For multiple discharges, number the discharges sequentially.
 - For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water
- The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.

d) Provide the state water quality classification of the receiving water Class B

e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 0 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:	Circle Finishing
Operator signature:	
Printed Name & Title:	Dan Galante, Vice President T. Ford Company
Date:	4/15/14

Appendix B

BMPs

Appendix B
Mitigation Measures
Best Management Practices

The following best management practices (BMPs) will be employed during construction in order to minimize the potential for adverse impacts to wetlands during construction activities:

1. Installation of erosion control barriers at the wetland/upland interface and at the discharge location to prevent the migration of sediment into downgradient wetland resources.
2. Use of weir tank, silt bags, filter cartridges and other sediment settling devices during dewatering measures to prevent discharge of turbid water downstream.
3. Use of timber mats for equipment operation within wetland areas to minimize soil compaction of non-target wetland areas.
4. Proper containment of soil stockpile areas to prevent migration of sediment toward wetland and to prevent cross-contamination during construction activities.
5. Conducting work during low flow or frozen ground conditions to minimize soil disruption and necessary dewatering, as feasible during the period of remediation.
6. Re-vegetation of disturbed soils upon completion of construction using native wetland and upland plant material with high wildlife habitat value.

Appendix C

2012 Laboratory Data

September 6, 2012

Allen Walker
Arcadis US Inc. - Braintree, MA
194 Forbes Road
Braintree, MA 02184

Project Location: Newburyport, MA
Client Job Number:
Project Number: [none]
Laboratory Work Order Number: 12H1011

Enclosed are results of analyses for samples received by the laboratory on August 29, 2012. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, reading "Meghan E. Kelley". The signature is written in a cursive, flowing style.

Meghan E. Kelley
Project Manager

Arcadis US Inc. - Braintree, MA
194 Forbes Road
Braintree, MA 02184
ATTN: Allen Walker

REPORT DATE: 9/6/2012

PURCHASE ORDER NUMBER:

PROJECT NUMBER: [none]

ANALYTICAL SUMMARY

WORK ORDER NUMBER: 12H1011

The results of analyses performed on the following samples submitted to the CON-TEST Analytical Laboratory are found in this report.

PROJECT LOCATION: Newburyport, MA

FIELD SAMPLE #	LAB ID:	MATRIX	SAMPLE DESCRIPTION	TEST	SUB LAB
ARC-SW1	12H1011-01	Surface Water		SM18-20 2340B SW-846 6010C SW-846 9014	
ARC-SW2	12H1011-02	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW3	12H1011-03	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW4	12H1011-04	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW5	12H1011-05	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW6	12H1011-06	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW7	12H1011-07	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SW8	12H1011-08	Surface Water		SM18-20 2340B SW-846 6010C	
ARC-SO1F (32-34in)	12H1011-11	Soil		SM 2540G SW-846 6010C	
ARC-SO1E (37-39in)	12H1011-12	Soil		SM 2540G SW-846 6010C	
ARC-SO1A (37-39in)	12H1011-14	Soil		SM 2540G SW-846 6010C	

CASE NARRATIVE SUMMARY

All reported results are within defined laboratory quality control objectives unless listed below or otherwise qualified in this report.

For method 6010, only Cd, Cr, Cu, Ni and Zn results were requested and reported.

The results of analyses reported only relate to samples submitted to the Con-Test Analytical Laboratory for testing.

I certify that the analyses listed above, unless specifically listed as subcontracted, if any, were performed under my direction according to the approved methodologies listed in this document, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete.

A handwritten signature in black ink, appearing to read "Daren J. Damboragian", is displayed on a light gray rectangular background.

Daren J. Damboragian
Laboratory Manager

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 10:15

Field Sample #: ARC-SW1

Sample ID: 12H1011-01

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.35	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:19	OP
Chromium	57	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:19	OP
Copper	64	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:19	OP
Nickel	43	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:19	OP
Zinc	8.3	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:05	OP
Hardness	480	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 10:15

Field Sample #: ARC-SW1

Sample ID: 12H1011-01

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:31	OP
Chromium	0.010	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:31	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:31	OP
Nickel	0.18	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:31	OP
Zinc	0.021	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:31	OP

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Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 10:15

Field Sample #: ARC-SW1

Sample ID: 12H1011-01

Sample Matrix: Surface Water

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cyanide	0.17	0.010	mg/L	1		SW-846 9014	9/5/12	9/5/12 14:15	VAK

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:55

Field Sample #: ARC-SW2

Sample ID: 12H1011-02

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:29	OP
Chromium	0.54	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:29	OP
Copper	0.68	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:29	OP
Nickel	0.39	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:29	OP
Zinc	0.15	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:12	OP
Hardness	110	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:55

Field Sample #: ARC-SW2

Sample ID: 12H1011-02

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:57	OP
Chromium	0.032	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:57	OP
Copper	0.43	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:57	OP
Nickel	0.30	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:57	OP
Zinc	0.10	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 12:57	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SW3

Sampled: 8/29/2012 10:05

Sample ID: 12H1011-03

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.0072	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:33	OP
Chromium	1.1	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:33	OP
Copper	0.99	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:33	OP
Nickel	0.55	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:33	OP
Zinc	0.10	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:17	OP
Hardness	110	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 10:05

Field Sample #: ARC-SW3

Sample ID: 12H1011-03

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:02	OP
Chromium	0.019	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:02	OP
Copper	0.029	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:02	OP
Nickel	0.15	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:02	OP
Zinc	0.037	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:02	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:35

Field Sample #: ARC-SW4

Sample ID: 12H1011-04

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:38	OP
Chromium	0.018	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:38	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:38	OP
Nickel	0.21	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 17:38	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:21	OP
Hardness	120	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SW4

Sampled: 8/29/2012 09:35

Sample ID: 12H1011-04

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:26	OP
Chromium	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:26	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:26	OP
Nickel	0.16	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:26	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 13:26	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SW5

Sampled: 8/29/2012 09:50

Sample ID: 12H1011-05

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.013	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:03	OP
Chromium	0.47	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:03	OP
Copper	5.2	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:03	OP
Nickel	1.0	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:03	OP
Zinc	1.2	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:27	OP
Hardness	290	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:50

Field Sample #: ARC-SW5

Sample ID: 12H1011-05

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:51	OP
Chromium	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:51	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:51	OP
Nickel	0.13	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:51	OP
Zinc	0.062	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:51	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:25

Field Sample #: ARC-SW6

Sample ID: 12H1011-06

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:08	OP
Chromium	0.020	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:08	OP
Copper	0.012	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:08	OP
Nickel	0.20	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:08	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:32	OP
Hardness	110	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SW6

Sampled: 8/29/2012 09:25

Sample ID: 12H1011-06

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:57	OP
Chromium	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:57	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:57	OP
Nickel	0.16	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:57	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 14:57	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:15

Field Sample #: ARC-SW7

Sample ID: 12H1011-07

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.012	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:14	OP
Chromium	1.2	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:14	OP
Copper	0.75	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:14	OP
Nickel	0.86	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:14	OP
Zinc	0.14	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:38	OP
Hardness	120	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SW7

Sampled: 8/29/2012 09:15

Sample ID: 12H1011-07

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:06	OP
Chromium	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:06	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:06	OP
Nickel	0.15	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:06	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:06	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:45

Field Sample #: ARC-SW8

Sample ID: 12H1011-08

Sample Matrix: Surface Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.013	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:19	OP
Chromium	1.0	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:19	OP
Copper	0.66	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:19	OP
Nickel	0.81	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 18:19	OP
Zinc	0.17	0.020	mg/L	1		SW-846 6010C	8/30/12	9/4/12 16:43	OP
Hardness	130	3.0	mg/L	1		SM18-20 2340B	8/30/12	9/4/12 11:21	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Sampled: 8/29/2012 09:45

Field Sample #: ARC-SW8

Sample ID: 12H1011-08

Sample Matrix: Surface Water

Metals Analyses (Dissolved)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:12	OP
Chromium	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:12	OP
Copper	ND	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:12	OP
Nickel	0.18	0.010	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:12	OP
Zinc	ND	0.020	mg/L	1		SW-846 6010C	8/30/12	8/31/12 15:12	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1F (32-34in)

Sampled: 8/29/2012 13:30

Sample ID: 12H1011-11

Sample Matrix: Soil

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	1.0	0.39	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:47	OP
Chromium	160	0.79	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:47	OP
Copper	120	0.79	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:47	OP
Nickel	130	0.79	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:47	OP
Zinc	69	1.6	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:47	OP

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Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1F (32-34in)

Sampled: 8/29/2012 13:30

Sample ID: 12H1011-11

Sample Matrix: Soil

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
% Solids	59.8		% Wt	1		SM 2540G	8/31/12	9/1/12 16:02	HGA

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1E (37-39in)

Sampled: 8/29/2012 11:15

Sample ID: 12H1011-12

Sample Matrix: Soil

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	0.43	0.38	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:51	OP
Chromium	70	0.77	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:51	OP
Copper	38	0.77	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:51	OP
Nickel	48	0.77	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:51	OP
Zinc	49	1.5	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 17:51	OP

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Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1E (37-39in)

Sampled: 8/29/2012 11:15

Sample ID: 12H1011-12

Sample Matrix: Soil

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
% Solids	64.4		% Wt	1		SM 2540G	8/31/12	9/1/12 16:02	HGA

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1A (37-39in)

Sampled: 8/29/2012 12:05

Sample ID: 12H1011-14

Sample Matrix: Soil

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	6.1	0.44	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 18:23	OP
Chromium	160	0.87	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 18:23	OP
Copper	150	0.87	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 18:23	OP
Nickel	310	0.87	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 18:23	OP
Zinc	160	1.7	mg/Kg dry	1		SW-846 6010C	8/30/12	8/31/12 18:23	OP

Project Location: Newburyport, MA

Sample Description:

Work Order: 12H1011

Date Received: 8/29/2012

Field Sample #: ARC-SO1A (37-39in)

Sampled: 8/29/2012 12:05

Sample ID: 12H1011-14

Sample Matrix: Soil

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag	Method	Date Prepared	Date/Time Analyzed	Analyst
% Solids	55.8		% Wt	1		SM 2540G	8/31/12	9/1/12 16:02	HGA

Sample Extraction Data**Prep Method: % Solids-SM 2540G**

Lab Number [Field ID]	Batch	Date
12H1011-11 [ARC-SO1F (32-34in)]	B058024	08/31/12
12H1011-12 [ARC-SO1E (37-39in)]	B058024	08/31/12
12H1011-14 [ARC-SO1A (37-39in)]	B058024	08/31/12

Prep Method: SW-846 3005A-SM18-20 2340B

Lab Number [Field ID]	Batch	Initial [mL]	Final [mL]	Date
12H1011-01 [ARC-SW1]	B057952	50.0	50.0	08/30/12
12H1011-02 [ARC-SW2]	B057952	50.0	50.0	08/30/12
12H1011-03 [ARC-SW3]	B057952	50.0	50.0	08/30/12
12H1011-04 [ARC-SW4]	B057952	50.0	50.0	08/30/12
12H1011-05 [ARC-SW5]	B057952	50.0	50.0	08/30/12
12H1011-06 [ARC-SW6]	B057952	50.0	50.0	08/30/12
12H1011-07 [ARC-SW7]	B057952	50.0	50.0	08/30/12
12H1011-08 [ARC-SW8]	B057952	50.0	50.0	08/30/12

Prep Method: SW-846 3050B-SW-846 6010C

Lab Number [Field ID]	Batch	Initial [g]	Final [mL]	Date
12H1011-11 [ARC-SO1F (32-34in)]	B057919	1.06	50.0	08/30/12
12H1011-12 [ARC-SO1E (37-39in)]	B057919	1.01	50.0	08/30/12
12H1011-14 [ARC-SO1A (37-39in)]	B057919	1.03	50.0	08/30/12

Prep Method: SW-846 3005A Dissolved-SW-846 6010C

Lab Number [Field ID]	Batch	Initial [mL]	Final [mL]	Date
12H1011-01 [ARC-SW1]	B057948	50.0	50.0	08/30/12
12H1011-02 [ARC-SW2]	B057948	50.0	50.0	08/30/12
12H1011-03 [ARC-SW3]	B057948	50.0	50.0	08/30/12
12H1011-04 [ARC-SW4]	B057948	50.0	50.0	08/30/12
12H1011-05 [ARC-SW5]	B057948	50.0	50.0	08/30/12
12H1011-06 [ARC-SW6]	B057948	50.0	50.0	08/30/12
12H1011-07 [ARC-SW7]	B057948	50.0	50.0	08/30/12
12H1011-08 [ARC-SW8]	B057948	50.0	50.0	08/30/12

Prep Method: SW-846 3005A-SW-846 6010C

Lab Number [Field ID]	Batch	Initial [mL]	Final [mL]	Date
12H1011-01 [ARC-SW1]	B057951	50.0	50.0	08/30/12
12H1011-02 [ARC-SW2]	B057951	50.0	50.0	08/30/12
12H1011-03 [ARC-SW3]	B057951	50.0	50.0	08/30/12
12H1011-04 [ARC-SW4]	B057951	50.0	50.0	08/30/12
12H1011-05 [ARC-SW5]	B057951	50.0	50.0	08/30/12
12H1011-06 [ARC-SW6]	B057951	50.0	50.0	08/30/12
12H1011-07 [ARC-SW7]	B057951	50.0	50.0	08/30/12
12H1011-08 [ARC-SW8]	B057951	50.0	50.0	08/30/12

Sample Extraction Data

SW-846 9014

Lab Number [Field ID]	Batch	Initial [mL]	Final [mL]	Date
12H1011-01 [ARC-SW1]	B058234	50.0	50.0	09/05/12

QUALITY CONTROL
Metals Analyses (Total) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B057919 - SW-846 3050B										
Blank (B057919-BLK1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	ND	0.25	mg/Kg wet							
Chromium	ND	0.50	mg/Kg wet							
Copper	ND	0.50	mg/Kg wet							
Nickel	ND	0.50	mg/Kg wet							
Zinc	ND	1.0	mg/Kg wet							
LCS (B057919-BS1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	94.6	0.50	mg/Kg wet	103		91.9	83.6-115.5			
Chromium	112	0.99	mg/Kg wet	119		94.1	81.6-117.6			
Copper	117	0.99	mg/Kg wet	118		99.4	81.6-117.8			
Nickel	64.9	0.99	mg/Kg wet	70.0		92.7	81.7-118.1			
Zinc	238	2.0	mg/Kg wet	276		86.1	82.2-117.8			
LCS Dup (B057919-BSD1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	98.0	0.50	mg/Kg wet	103		95.1	83.6-115.5	3.47	30	
Chromium	116	0.99	mg/Kg wet	119		97.6	81.6-117.6	3.68	30	
Copper	121	0.99	mg/Kg wet	118		102	81.6-117.8	2.98	30	
Nickel	66.5	0.99	mg/Kg wet	70.0		95.0	81.7-118.1	2.51	30	
Zinc	235	2.0	mg/Kg wet	276		85.3	82.2-117.8	0.977	30	
Batch B057951 - SW-846 3005A										
Blank (B057951-BLK1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	ND	0.0040	mg/L							
Chromium	ND	0.010	mg/L							
Copper	ND	0.010	mg/L							
Nickel	ND	0.010	mg/L							
Zinc	ND	0.020	mg/L							
LCS (B057951-BS1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	2.08	0.0040	mg/L	2.00		104	80-120			
Chromium	1.91	0.010	mg/L	2.00		95.5	80-120			
Copper	1.99	0.010	mg/L	2.00		99.3	80-120			
Nickel	1.99	0.010	mg/L	2.00		99.3	80-120			
Zinc	2.05	0.020	mg/L	2.00		103	80-120			
LCS Dup (B057951-BSD1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	2.12	0.0040	mg/L	2.00		106	80-120	2.27	20	
Chromium	1.95	0.010	mg/L	2.00		97.5	80-120	2.04	20	
Copper	2.05	0.010	mg/L	2.00		103	80-120	3.16	20	
Nickel	2.03	0.010	mg/L	2.00		101	80-120	2.00	20	
Zinc	2.09	0.020	mg/L	2.00		105	80-120	2.02	20	

QUALITY CONTROL

Metals Analyses (Total) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch B057952 - SW-846 3005A

Blank (B057952-BLK1)

Prepared: 08/30/12 Analyzed: 09/04/12

Hardness	ND	3.0	mg/L
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QUALITY CONTROL
Metals Analyses (Dissolved) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B057948 - SW-846 3005A Dissolved										
Blank (B057948-BLK1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	ND	0.0040	mg/L							
Chromium	ND	0.010	mg/L							
Copper	ND	0.010	mg/L							
Nickel	ND	0.010	mg/L							
Zinc	ND	0.020	mg/L							
LCS (B057948-BS1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	0.538	0.0040	mg/L	0.500		108	80-120			
Chromium	0.534	0.010	mg/L	0.500		107	80-120			
Copper	0.532	0.010	mg/L	0.500		106	80-120			
Nickel	0.541	0.010	mg/L	0.500		108	80-120			
Zinc	0.543	0.020	mg/L	0.500		109	80-120			
LCS Dup (B057948-BSD1)				Prepared: 08/30/12 Analyzed: 08/31/12						
Cadmium	0.515	0.0040	mg/L	0.500		103	80-120	4.45	20	
Chromium	0.510	0.010	mg/L	0.500		102	80-120	4.56	20	
Copper	0.510	0.010	mg/L	0.500		102	80-120	4.22	20	
Nickel	0.515	0.010	mg/L	0.500		103	80-120	5.05	20	
Zinc	0.522	0.020	mg/L	0.500		104	80-120	4.03	20	
Duplicate (B057948-DUP1)				Source: 12H1011-01		Prepared: 08/30/12 Analyzed: 08/31/12				
Cadmium	ND	0.0040	mg/L		ND			NC	20	
Chromium	ND	0.010	mg/L		0.0104			NC	20	
Copper	ND	0.010	mg/L		ND			NC	20	
Nickel	0.174	0.010	mg/L		0.179			2.74	20	
Zinc	0.0200	0.020	mg/L		0.0206			2.96	20	
Matrix Spike (B057948-MS1)				Source: 12H1011-01		Prepared: 08/30/12 Analyzed: 08/31/12				
Cadmium	0.565	0.0040	mg/L	0.500	ND	113	75-125			
Chromium	0.572	0.010	mg/L	0.500	0.0104	112	75-125			
Copper	0.583	0.010	mg/L	0.500	0.00797	115	75-125			
Nickel	0.734	0.010	mg/L	0.500	0.179	111	75-125			
Zinc	0.607	0.020	mg/L	0.500	0.0206	117	75-125			

QUALITY CONTROL
Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B058234 - SW-846 9014										
Blank (B058234-BLK1)				Prepared & Analyzed: 09/05/12						
Cyanide	ND	0.010	mg/L							
LCS (B058234-BS1)				Prepared & Analyzed: 09/05/12						
Cyanide	0.70	0.010	mg/L	0.704		99.2	80-120			
LCS Dup (B058234-BSD1)				Prepared & Analyzed: 09/05/12						
Cyanide	0.68	0.010	mg/L	0.704		96.2	80-120	3.00	20	
Matrix Spike (B058234-MS1)				Source: 12H1011-01		Prepared & Analyzed: 09/05/12				
Cyanide	0.52	0.010	mg/L	0.348	0.17	103	75-125			
Matrix Spike Dup (B058234-MSD1)				Source: 12H1011-01		Prepared & Analyzed: 09/05/12				
Cyanide	0.51	0.010	mg/L	0.348	0.17	97.9	75-125	3.47	20	

FLAG/QUALIFIER SUMMARY

- * QC result is outside of established limits.
- † Wide recovery limits established for difficult compound.
- ‡ Wide RPD limits established for difficult compound.
- # Data exceeded client recommended or regulatory level

Percent recoveries and relative percent differences (RPDs) are determined by the software using values in the calculation which have not been rounded.

CERTIFICATIONS

Certified Analyses included in this Report

Analyte	Certifications
SM18-20 2340B in Water	
Hardness	CT,MA,NH,NY,RI
SW-846 6010C in Soil	
Cadmium	CT,NH,NY,ME,NC
Chromium	CT,NH,NY,ME,NC
Copper	CT,NH,NY,ME,NC
Nickel	CT,NH,NY,ME,NC
Zinc	CT,NH,NY,ME,NC
SW-846 6010C in Water	
Cadmium	CT,NH,NY,RI,ME,NC
Cadmium	CT,NH,NY,RI,ME,NC
Chromium	CT,NH,NY,RI,ME,NC
Chromium	CT,NH,NY,RI,ME,NC
Copper	CT,NH,NY,RI,ME,NC
Copper	CT,NH,NY,RI,ME,NC
Nickel	CT,NH,NY,RI,ME,NC
Nickel	CT,NH,NY,RI,ME,NC
Zinc	CT,NH,NY,RI,ME,NC
Zinc	CT,NH,NY,RI,ME,NC
SW-846 9014 in Water	
Cyanide	NY,CT,NH,RI,NC,ME

The CON-TEST Environmental Laboratory operates under the following certifications and accreditations:

Code	Description	Number	Expires
AIHA	AIHA-LAP, LLC	100033	02/1/2014
MA	Massachusetts DEP	M-MA100	06/30/2013
CT	Connecticut Department of Public Health	PH-0567	09/30/2013
NY	New York State Department of Health	10899 NELAP	04/1/2013
NH	New Hampshire Environmental Lab	2516 NELAP	02/5/2013
RI	Rhode Island Department of Health	LAO00112	12/30/2012
NC	North Carolina Div. of Water Quality	652	12/31/2012
NJ	New Jersey DEP	MA007 NELAP	06/30/2013
FL	Florida Department of Health	E871027 NELAP	06/30/2013
VT	Vermont Department of Health Lead Laboratory	LL015036	07/30/2013
WA	State of Washington Department of Ecology	C2065	02/23/2013
ME	State of Maine	2011028	06/9/2013
VA	Commonwealth of Virginia	1381	12/14/2012



# of Containers	Preservation	Container Co
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*****Container Co
Dissolved Meta**

☐ Field Filtered

☒ Lab to Filler

*****Cont. Code:**

G=glass

ST=sterile

T=tedlar bag

****preservation**

I = Iced
H = HCl

M = Methanol

S = Sulfuric Acid

X = Na hydroxide

T = Na thiosulfate

100

***Matrix Code:**

WW = wastewater

DW = drinking water
A = air

S = soil/solid

0 = other

##

AIHA-LAP, LLC
Credited

E/DBE Certifi

COMPLETELY OR

10

39 Spruce St.
East Longmeadow, MA. 01028
P: 413-525-2332
F: 413-525-6405
www.contestlabs.com



Sample Receipt Checklist

CLIENT NAME: Arcadis RECEIVED BY: KKm DATE: 8-29-12

- 1) Was the chain(s) of custody relinquished and signed? Yes No No CoC Included
2) Does the chain agree with the samples? Yes No
If not, explain:
3) Are all the samples in good condition? Yes No
If not, explain:

4) How were the samples received:

On Ice ☒ Direct from Sampling ☐ Ambient ☐ In Cooler(s) ☒

Were the samples received in Temperature Compliance of (2-6°C)? Yes No N/A

Temperature °C by Temp blank _____ Temperature °C by Temp gun 4.1C

5) Are there Dissolved samples for the lab to filter? SLD Yes No

Who was notified AED NOT Available Date 8-29-12 Time 19:15

6) Are there any RUSH or SHORT HOLDING TIME samples? Yes No

Who was notified AED Date 8-29-12 Time 19:15

7) Location where samples are stored:

19

Permission to subcontract samples? Yes No
(Walk-in clients only) if not already approved
Client Signature: _____

8) Do all samples have the proper Acid pH: Yes No N/A

9) Do all samples have the proper Base pH: Yes No N/A

10) Was the PC notified of any discrepancies with the CoC vs the samples: Yes No N/A

Containers received at Con-Test

	# of containers		# of containers
1 Liter Amber		8 oz amber/clear jar	<u>9</u>
500 mL Amber		4 oz amber/clear jar	
250 mL Amber (8oz amber)		2 oz amber/clear jar	
1 Liter Plastic		Air Cassette	
500 mL Plastic		Hg/Hopcalite Tube	
250 mL plastic	<u>18</u>	Plastic Bag / Ziploc	
40 mL Vial - type listed below		PM 2.5 / PM 10	
Colisure / bacteria bottle		PUF Cartridge	
Dissolved Oxygen bottle		SOC Kit	
Encore		TO-17 Tubes	
Flashpoint bottle		Non-ConTest Container	
Perchlorate Kit		Other glass jar	
Other		Other	

Laboratory Comments:

40 mL vials: # HCl _____ # Methanol _____

Time and Date Frozen: _____

Doc# 277 # Bisulfate _____ # DI Water _____

Rev. 3 May 2012 # Thiosulfate _____ Unpreserved _____

MADEP MCP Analytical Method Report Certification Form

Laboratory Name: Con-Test Analytical Laboratory

Project #: 12H1011

Project Location: Newburyport, MA

RTN:

This Form provides certifications for the following data set: [list Laboratory Sample ID Number(s)]

12H1011-01 thru 12H1011-14

Matrices: Soil

Water

CAM Protocol (check all that below)

8260 VOC CAM II A ()	7470/7471 Hg CAM IIIB ()	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 A ()	8151 Herbicides CAM V C ()	8330 Explosives CAM VIII A ()	TO-15 VOC CAM IX B ()
6010 Metals CAM III A (X)	6020 Metals CAM III D ()	8082 PCB CAM V A ()	9014 Total Cyanide/PAC CAM VI A (X)	6860 Perchlorate CAM VIII B ()	

Affirmative response to Questions A through F is 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 ¹
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 ¹
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 ¹
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 ¹
E 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).	<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
E b	APH and TO-15 Methods only: Was the complete analyte list reported for each method?	<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
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 ¹

A response to questions G, H and I below is 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
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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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No ¹

¹ All Negative responses must be addressed in an attached Environmental Laboratory case 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 Manager

Printed Name: Daren J. Damboragian

Date: 09/06/12