

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

CERTIFIED MAIL RETURN RECEIPT REQUESTED

JUL 1 1 2014

Carl Dietz Director of Community Development City of Chicopee 38 Centre St. Chicopee, MA 01020

Re: Authorization to discharge under the Remediation General Permit (RGP) – MAG910000. Former Uniroyal Facility site located at 154 Grove Street, Chicopee, MA, Hampden County; Authorization # MAG910628

Dear Mr. Dietz:

Based on the review of a Notice of Intent (NOI) submitted by Craig Ellis from BETA Group, Inc., on behalf of the City of Chicopee, 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: <u>http://www.epa.gov/region1/npdes/mass.html#dgp</u>.

Please note the enclosed checklist includes parameters that exceeded Appendix III limits. The checklist also include, antimony, cadmium copper and lead parameters for which your laboratory reports indicated there was insufficient sensitivity to detect these parameters at the minimum levels established in Appendix VI of the RGP.

Also, please note that the metals included on the checklist are dilution dependent pollutants and subject to limitations based on a dilution factor range (DFR), due to the ample dilution at the point of discharge (210), the DFR applicable for the metals indicated below falls within the ceiling values established in the RGP. (See the RGP Appendix IV for Massachusetts facilities). Therefore, the limit for antimony of 141 ug/L,

cadmium of 260 ug/L, copper of 2,070 ug/L, lead of 1,430 ug/L, selenium of 408 ug/L, and iron of 5,000 ug/L, shall not be exceeded in the discharge.

This general permit and authorization to discharge will expire on September 9, 2015. You have reported this project will terminate on April 1, 2017. In order for the discharge to continue after the permit's expiration date you are required to reapply for coverage after the general permit is reissued. Also, 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,

Huma Murphy Thelma Murphy, Chief Storm Water and Construction

Permits Section

Enclosure

cc: Robert Kubit, MassDEP Jeffrey Neece, Chicopee PWD Craig Ellis, BETA Group, Inc.

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

NPDES Authorization Number:	1 1 1 6 16	MAG910628	
Authorization Issued:	July,	2014	
Facility/Site Name:		er Uniroyal Facility	
Facility/Site Address:		Grove Street, Chicopee, MA 01020	
1	Email	address of owner: cdietz@chicopeema.gov	
Legal Name of Operat	or:	City of Chicopee	
Operator contact name and Address:	e, title,	Carl Dietz City of Chicopee Director of Community Development Telephone: 413-5941490; Email: cdietz@chicopee.gov	
a mana an		Email: Same as the Owner	
Estimated date of the s Completion:	site's	August 2017	
Category and Sub-Cate	egory:	Category III-Contaminated Construction Dewatering. Subcategory B. Known Contaminated Sites	
RGP Termination Date:	IM VO	September 10, 2015	
Receiving Water:		Chicopee River	
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Monitoring & Limits are applicable if checked. All samples are to be collected as grab samples

	Parameter	Effluent Limit/Method#/ML (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
\checkmark	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
1/10	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
þ.	5. Benzene (B)	5ug/L /50.0 ug/L for hydrostatic testing only/ Me#8260C/ML 2 ug/L
ű.	6. Toluene (T)	(limited as ug/L total BTEX)/ Me#8260C/ ML 2ug/L
IN	7. Ethylbenzene (E)	(limited as ug/L total BTEX) Me#8260C/ ML 2ug/L

	<u>Parameter</u>	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)
	8. (m,p,o) Xylenes (X)	(limited as ug/L total BTEX) Me#8260C/ ML 2ug/L
	 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
eve	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
1.00	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
vit	24. Tetrachloroethene (PCE)	5.0 ug/L/Me#8260C/ ML 5ug/L
I III	25. 1,1,1 Trichloro-ethane (TCA)	200 ug/L/Me#8260C/ ML 5ug/L
1.1	26. 1,1,2 Trichloro-ethane (TCA)	5.0 ug/L /Me#8260C/ ML 5ug/L
00	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
1.	31. Total Phenols	300 ug/L Me#420.1&420.2/ML 2 ug/L/ Me# 420.4 /ML 50ug/L
ph	32. Pentachlorophenol (PCP)	1.0 ug/L /Me#8270D/ML 5ug/L,Me#604 &625/ML 10ug/L
00	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
101	34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl)	6.0 ug/L /Me#8270D/ML 5ug/L,Me#606/ML 10ug/L & Me#625/ML

	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)
	34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	6.0 ug/L /Me#8270D/ML 5ug/L,Me#606/ML 10ug/L & Me#625/ML 5ug/L
	35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	10.0 ug/L
	a. Benzo(a) Anthracene 7	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	b. Benzo(a) Pyrene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	c. Benzo(b)Fluoranthene 7	0.0038 ug/L /Me#8270D/ ML 5ug/L, 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
Ude	i. Acenaphthylene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
dr	j. Anthracene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
E.	k. Benzo(ghi) Perylene	X/Me#8270D/ML 5ug/L,Me#610/ML 5ug/L & Me#625/ML 5ug/L
	I. 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
PQ	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
\checkmark	38. Chloride	Monitor only/Me# 300.0/ ML 100 ug/L

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	um Limit, unless denoted by a **, case it will be a Monthly Average Limit) . /Me#82700/ML he#606/ML 10ug/L & Me#625/ML		<u>Limit</u> mg/l nits =	<u>Minir</u> level	
	Metal parameter	Freshwater Limts	Voylog 1	ilate] Total Group	Ph() 1
\checkmark	39. Antimony	141	i) enodras	ML	10
	40. Arsenic **	10	abitant	ML	20
\checkmark	41. Cadmium **	260		ML	10
	42. Chromium III (trivalent) **	48.8	i and	ML	15
	43. Chromium VI (hexavalent) **	11.4	nuediaes	ML	10
\checkmark	44. Copper **	2,070		ML	15
V	45. Lead **	430	anadiner	ML	20
	46. Mercury **	0.9		ML	02
	47. Nickel **	29		ML	20
\checkmark	48. Selenium **	408		ML	20
	49. Silver	1.2	18051/1/1	ML	10
	50. Zinc **	66.6		ML	15
\checkmark	51. Iron	5,000	ent) Pyrei	ML	20

	Other Parameters	Limit
V	52. Instantaneous Flow	Site specific in CFS
V	53. Total Flow	Site specific in CFS
V	54. pH Range for Class A & Class B Waters in MA	6.5-8.3; 1/Month/Grab13
	55. pH Range for Class SA & Class SB Waters in MA	6.5-8.3; 1/Month/Grab13
	56. pH Range for Class B Waters in NH	6.5-8; 1/Month/Grab13
	57. Daily maximum temperature - Warm water	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).

¹³pH 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



June 23, 2014

Mr. Victor Alvarez U.S. Environmental Protection Agency EPA-Region 1 5 Post Office Square Mail Code OEP06-4 Boston, MA 02109-3912

RE: Notice of Intent for Remediation General Permit Former Uniroyal Facility 154 Grove Street Chicopee, Massachusetts 01020

Dear Mr. Alvarez:

BETA Group, Inc. (BETA) herein provides supporting documentation for the Notice of Intent (NOI) for the Remediation General Permit (RGP) on behalf of Office of Community Development (OCD) for the City of Chicopee project referenced above. This NOI is being submitted in order to obtain approval for the proposed discharge of pumped groundwater via the operation of a temporary groundwater dewatering system (GWDS). The groundwater dewatering activities are required to support the initial phases of the demolition of Building 7 at the above-referenced former Uniroyal Facility (previously the United States Rubber Company, here-in-after "the Site")located at 154 Grove Street in Chicopee, Massachusetts.

A Site Locus is provided as Figure 1. A Site Plan depicting the dewatering discharge location is included as Figure 2 and a dewatering system schematic is included as Figure 3 Figures identified as 17 and 18, prepared by GZA, indicate the location of nearby monitoring wells from previous investigations. A copy of the NOI Form for the RGP Application is provided as Attachment I.

System Design

Between January and March of 2010, the existing connections for former Uniroyal Buildings #1 through #6 to the Army Corp of Engineers (ACOE) collector drain were disconnected in preparation for demolition. The ACOE collector drain services the Chicopee Flood Control Works (along the east bank of the Chicopee River) at the former Uniroyal Facility. Floor drains and other surface drain connections to both drain manholes and in-line wye connections were successfully plugged or sealed. The sealing off of the buildings from the drain has caused a perched water condition within the former Uniroyal including the flooding of the basements of the lower tier buildings. Consequently, two (2) extraction wells are proposed to be installed at the westerly corners of Building 7 to lower the hydraulic grade line prior to the planned hazardous material abatement and building demolition activities.

The temporary GWDS will include multiple pumps to pump groundwater from the extraction wells proximal to Building 7. The groundwater will be pumped into a fractionation tank to allow sediment to settle prior to discharge via gravity into a pipe leading to the ACOE interceptor at manhole MH#6. Appropriately sized bag filters and/or liquid phase granular activated carbon (LGAC) units are not anticipated to be necessary, but will be utilized should total suspended solids (TSS) or dissolved phase constituents concentrations warrant their use. A flow schematic of the proposed dewatering plan is included as Figure 3. The average discharge flow rate of treated groundwater from the system to the storm water drainage system is estimated at 150 gallons per

BETA GROUP, INC.

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minute (gpm). The maximum discharge flow rate is estimated to be 200 gpm. The ACOE collector drain discharges into the Chicopee River, which flows north along the western portion of the Site beyond the flood wall, approximately 100 - 150 feet (ft) west of the project area.

Receiving Waters Information

The treated groundwater will be discharged into the ACOE connector drain located along the western perimeter of the Site which ultimately flows into the Chicopee River. The Site is downgradient of two hydroelectric power stations, Western Massachusetts Electric Co.'s Red Bridge Impoundment Station and I. Maxmat Co.'s Collins Dam Station. According to the Chicopee River Watershed 2003 Water Quality Assessment Report prepared by the Massachusetts Department of Environmental Protection (MassDEP) Division of Watershed Management, the Red Bridge Impoundment Station is required to release a continuous flow of 237 cubic feet per second (cfs) with a variable flow permitted between 140 and 300 cfs on an interim basis. The Collins Dam, for the most part, is reported to maintain flows of approximately 200 cfs. For the purposes of this report and to provide a conservative estimate, a 7-day, 10 year (7Q10) low flow rate for the receiving water of 140 cfs was used. A copy of the 7Q10 data from the 2003 Assessment report is included in Attachment III.

Receiving Water Classification

BETA consulted the MassDEP Division of Water Pollution Control website (http://www.mass.gov/eea/docs/dep/water/laws/i-thru-z/tblfig.pdf) to determine the classification for the receiving water and the Division of Water Resources for the applicability of Total Maximum Daily Load (TMDLs) for the water body receiving the discharge. The treated groundwater will be discharged to the Chicopee River subbasin between the confluence of the Ware and Quaboag Rivers and the Connecticut River. This segment of the Chicopee River is classified as Class B, warm water fishery, and combined sewer outfall (CSO). According to the Massachusetts Year 2014 Integrated List of Waters (http://www.mass.gov/eea/docs/dep/water/resources/07v5/14iwlistp.pdf), the section of the Chicopee River receiving the discharge is listed as an impaired water for fecal coliform bacteria. No TDML has yet been established for fecal coliform and fecal coliforms are not a contaminant of concern for the proposed discharge.

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Historical Groundwater Sampling Results

In 2009, groundwater monitoring wells ECS-16 and ECS-17 (See Figure 3) were sampled and analyzed for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH), polychlorinated biphenyls (PCBs), and metals. No VPH, EPH, or PCB compounds were detected in the collected groundwater samples above their respective laboratory method detection limits (MDLs).

In March 2012, monitoring wells MW-8 through MW-11 were sampled for dissolved RCRA 8 metals, EPH, VPH, and PCBs. No VPH, EPH, or PCB compounds were detected above their respective laboratory MDLs for the groundwater samples collected from these wells. RCRA 8 metals detected in the collected groundwater samples were compared to 310 CMR 40.0000 Massachusetts Contingency Plan (MCP) Method 1 Risk Characterization standards. As noted, the compounds detected during the 2012 sampling event were below their respective applicable MCP Method 1 standards. Tables from these two sampling events, conducted by others, are included as Attachment II.



Current Groundwater Sample Analysis - June 18, 2014

On June 18, 2014, BETA collected a groundwater sample from monitoring well MW-11 in order to obtain current analytical data prior to discharge. The groundwater sample was analyzed for Total Suspended Solids (TSS), TPH by EPA Method 1664, total residual chlorine, chlorides, total cyanide, PCBs, total metals, SVOCs with phenols, and VOCs by EPA method 8260. No VOCs, SVOCs, PCBs, or TPH was detected above method detection limits. With the exception of selenium and iron, no metals were detected above method detection limits. Groundwater analytical results were compared to the Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Remediation General Permit (RGP) discharge criteria and the total selenium concentration of 10 ug/l exceeded the EPA undiluted discharge limit of 5 ug/l; however, it is below the EPA discharge limits for selenium with dilution, as described in the section below. A summary of the groundwater analytical data is presented in the contaminant information table in the NOI application provided as Attachment I. Copies of the laboratory reports and chain of custody records are provided as Attachment III.

Dilution Factor Application for Metals

For detected total metals concentrations, the RGP allows for a site-specific dilution factor (DF) to be calculated based on the expected maximum discharge flow rate and the 7Q10 of the receiving water. The calculated DF was applied to the average of the detected total metals concentrations which were greater than the applicable NPDES RGP discharge effluent limits. The DF is applicable to arsenic, copper, iron, lead, and silver, and the calculated DF was used to determine the appropriate Dilution Range concentrations for these metals. The DF was calculated using the following equation:

DF = (Qd + Qs)/Qd

where Qd is the maximum discharge flow rate from the system, assumed to be 300 gpm (0.67 cfs), and Qs is the receiving water flow rate, minimum for 7 consecutive days with a recurrence interval of 10 years (i.e. 7Q10), estimated to be 140 cfs (as indicated above based on minimum flow from upgradient dams). Using these values, the DF calculated was 210. According to Appendix IV of the Remediation General Permit for Discharges in Massachusetts, the discharge limitations for the calculated dilution factor (DF) of 210 are at their respective ceiling values for metals believed to be present in the discharge based on laboratory analytical results of current and historical groundwater samples from the project area. The metals believed to be present include selenium and iron and have respective ceiling values of 0.408 mg/L and 5 mg/L. The total selenium concentration, detected at 0.01 mg/l, was below its applicable discharge limit of 0.408 using a DF >100. Similarly, total iron, detected at 0.37 mg/l, was below its applicable discharge limit of 5 mg/l using a DF >100.

Evaluation of Threatened or Endangered Species or Critical Habitat Located within Receiving Waters

According to Massachusetts Geographic Information Systems (MassGIS) online maps for the Natural Heritage Endangered Species Program (NHESP) (2008), no Priority Habitat of Rare Species or Estimated Habitats of Rare Wildlife are located within the proposed work zone area. On June 18, 2014, BETA requested a review of threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitats from the US Fish and Wildlife Service (http://ecos.fws.gov/ipac/). According to their review, there were no endangered species or critical habitats in the vicinity of the proposed project. BETA contacted NOAA fisheries protected resources division to evaluate if there were protected species in the vicinity of the proposed discharge. According to NOAA they do not expect any species listed by NOAA



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to be exposed to any effects from the proposed project. BETA has attached the MassGIS Map, the letter from the FWS and the e-mail from NOAA as Attachment IV.

Review of National Register of Historic Places

According to the Massachusetts Historical Commission (MHC) the former Uniroyal complex was considered eligible for listing on the State and National Registers of Historic Places due to its industrial history. However, as part of this Brownfield project, the MHC has permitted the demolition of eight (8) buildings at the facility, including Building 7, due to the structural instability, presence of contamination, and infeasibility for reuse. Copies of the Memorandum of Agreement from the MHC are provided as Attachment IV. No other historic structures or properties are located in the immediate vicinity which would be anticipated to be impacted by this project.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours, BETA Group, Inc.

Craig Ellis, LSP Senior Project Manager

adocom

Alan Hanscom, LSP Senior Project Manager

cc: Carl Dietz, City of Chicopee

Figures:

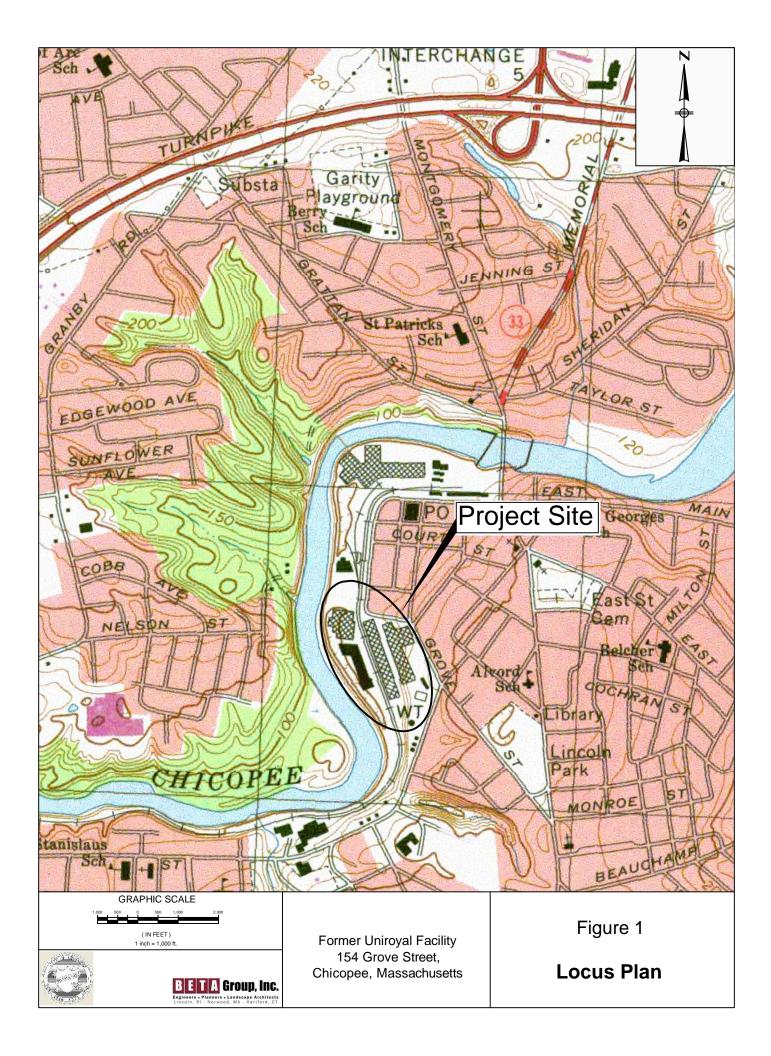
Figure 1	Site Locus Plan
Figure 2	Site Plan
Figure 3	Dewatering System Schematic
Figure 4	EU-7 Monitoring Well Locations (by GZA)
Figure 5	EU-7 North Central Area monitoring Wells (by GZA)

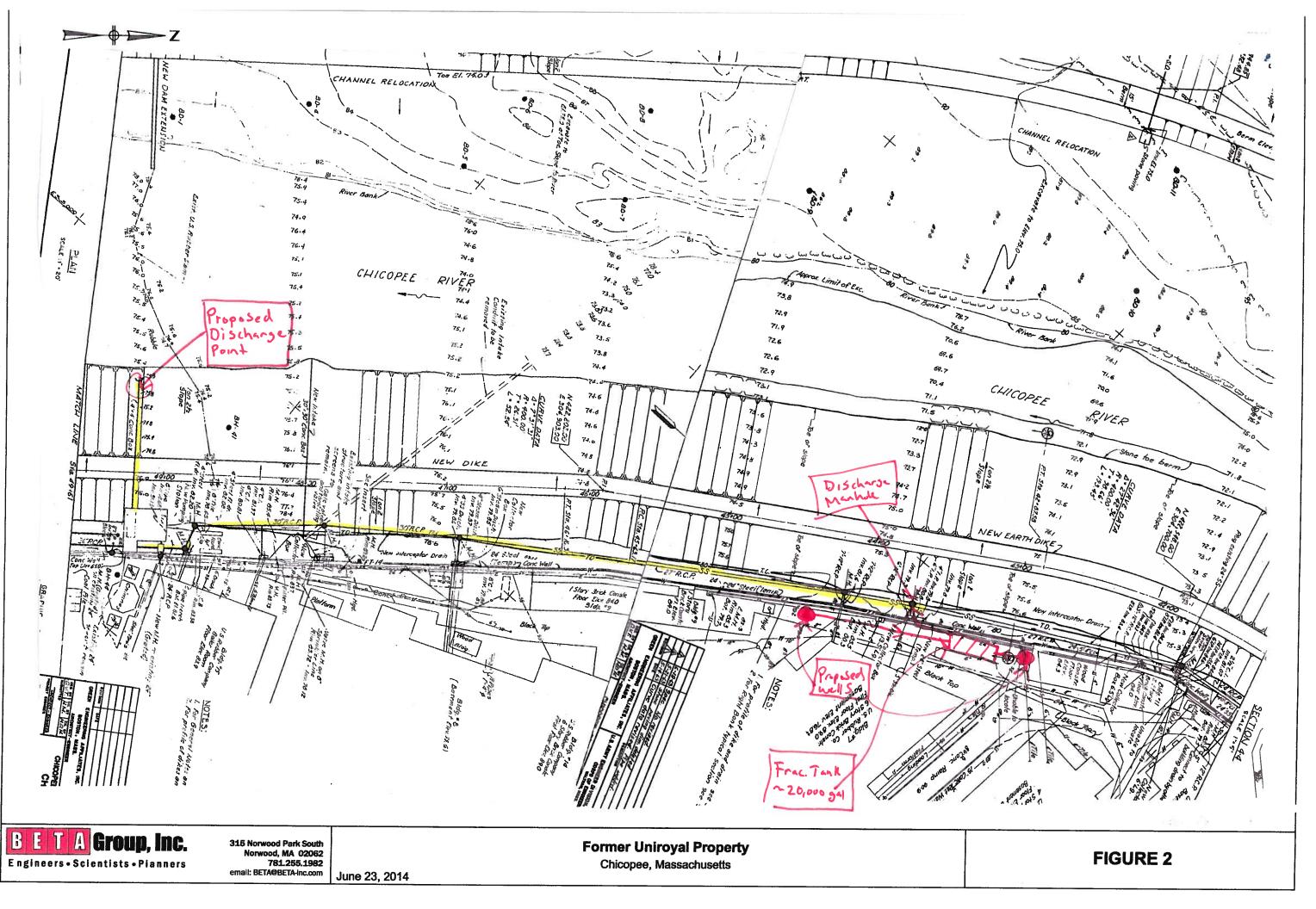
Attachments:

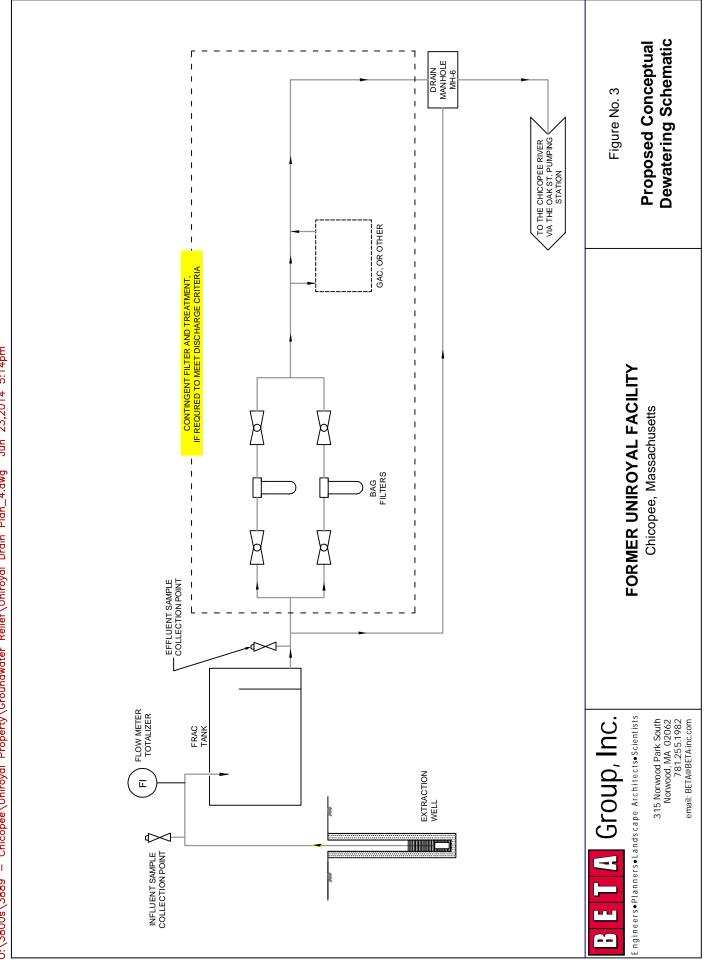
Attachment I	NOI Form for RGP
Attachment II	GZA and ECS Historical Groundwater Sampling Results
Attachment III	Laboratory Analytical Results
Attachment IV	MassGIS Map, NOAA and FWS endangered species and critical habitat review
	MOA – Massachusetts Historical Commission



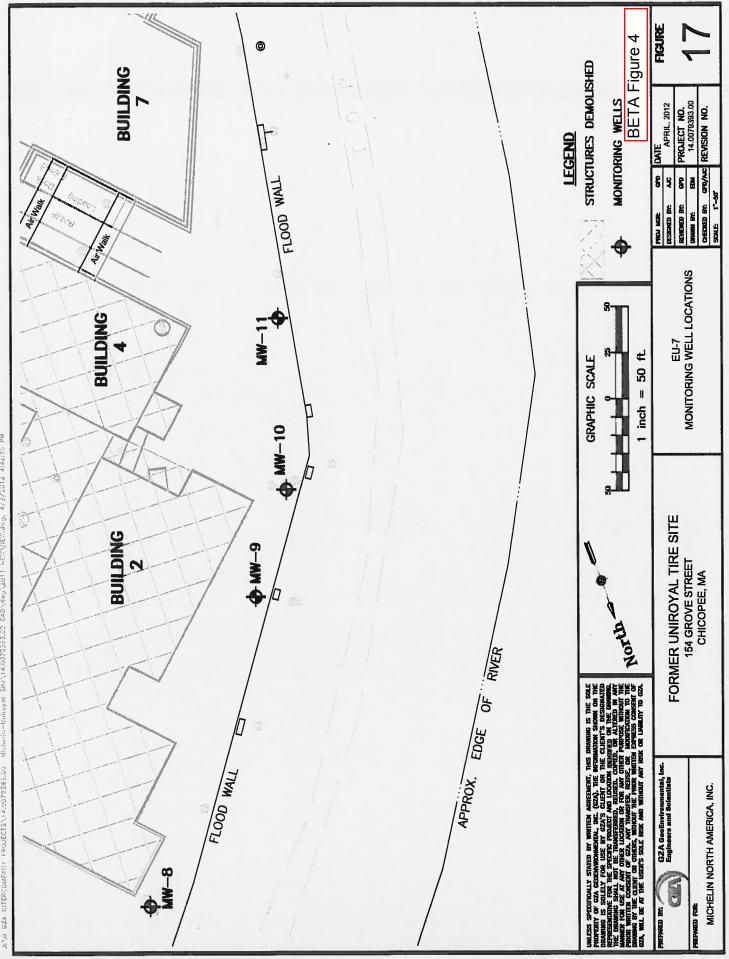
FIGURES



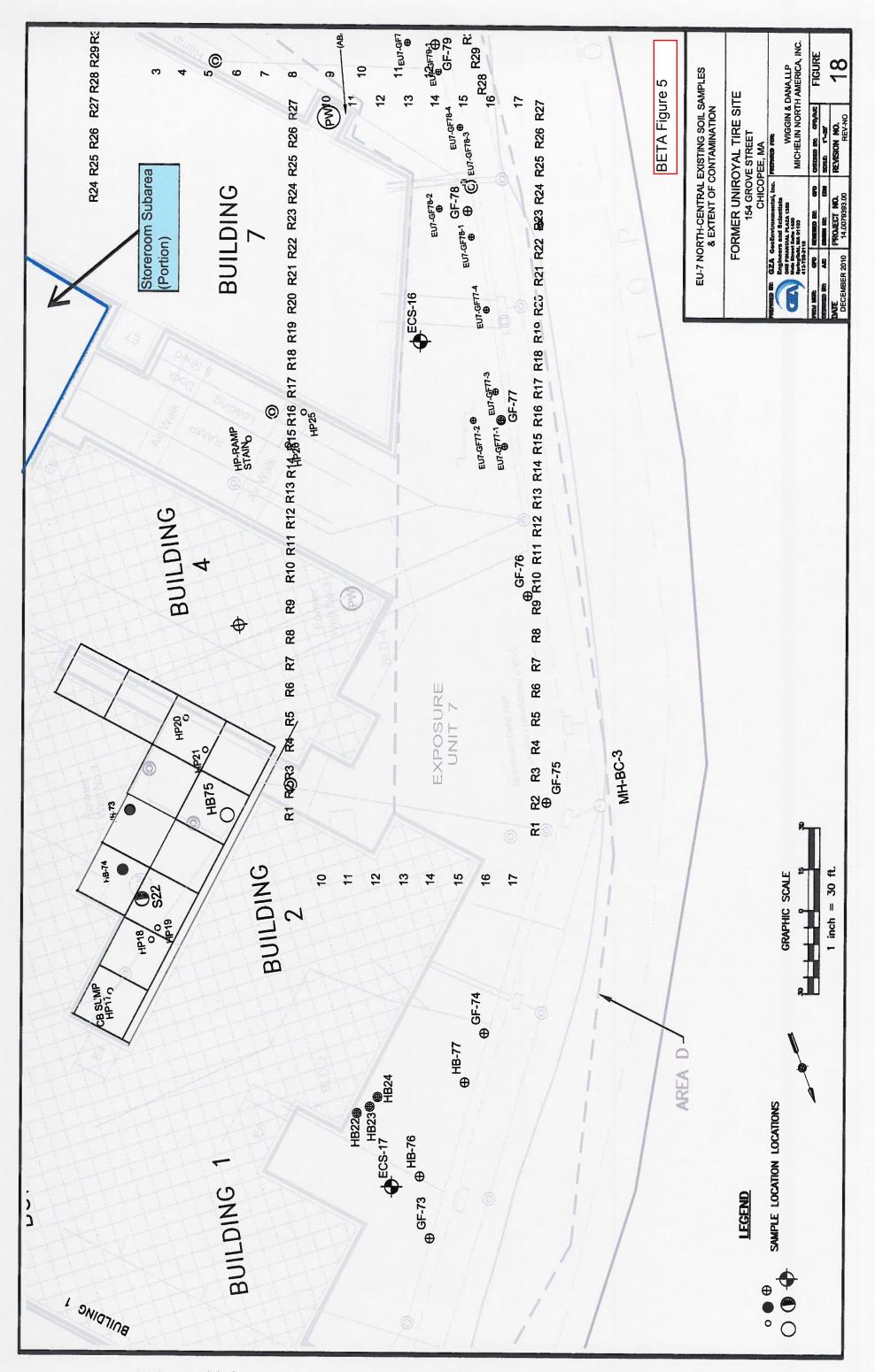




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Mischelin-Unitopal Site\14.0079553.00 CaD\4wg\2011 NEU\01EEC.050.4/2/2012 4:42:35 PM JAN BEA THERCOMPANY FROJECTS/14.0079395.00



MA 12:44:11 1102/5/1 Michall Uniroyal Site/14.0073530.0 Michall Uniroyal Site/14.00752525.00 Michall Uniroya

ATTACHMENT I NOI RGP FORM

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

Ĩ 4 **211**2 2 ζ .

1. General facility/site information. Please provide the following information about the site:	ease provide th	le following information al	bout the site:
a) Name of facility/site: Former Uniroyal Facility	Icility	Facility/site mailing address:	ress:
Location of facility/site : longitude: 72.588194 latitude: 42.154164	Facility SIC code(s):	Street: 154 Grove Street	
b) Name of facility/site owner:		Town: Chicopee	
Email address of facility/site owner: cdietz@chicopeema.gov		State:	
Telephone no. of facility/site owner: 413-594-1490	94-1490	YIM A	01020
Fax no. of facility/site owner:		Owner is (check one): 1	Owner is (check one): 1. Federal O 2. State/Tribal O
Address of owner (if different from site):		3. Private O 4. Other O if so, describe: City of Chicopee	• if so, describe:
Street: 38 Center Street			
Town: Chicopee	State: MA	Zip: 01020	County Hamden
c) Legal name of operator :	Operator tel	Operator telephone no: 413-594-1490	
City of Chicopee	Operator fat	Operator fax no.: 413-594-1495	Operator email: cdietz@chicopeema.gov
Operator contact name and title: Carl Dietz	z		
Address of operator (if different from owner):	Street:		
Town:	State:	Zip:	County:

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3. Fis the discharge as defined by 40 CFK 12.2.27 V ON O 4. For sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) and exempt from state permitting? Y ON O 5. For sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) and exempt from state permitting? Y ON O 6. Is site/facility subject to any State permitting, license, in the state of NH oc or other action which is causing the generation of if Y, number: I. Multi-Sector General Permit? Y ON O 7. Site identification # assigned to the state of NH oc motion, and the infinetion # assigned to the state of NH oc motion, and if Y, number: I. Anti-Sector General Permit? Y ON O 3. state agency contact information: name, location, and telephone number: I. Antivical Deviate interference (ACEC)? Y ON O 9. Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y ON O I. Portoleum Related Site information and any historical sampling data, identify the sub-category into which the potential discharge falls. 1. Petroleum Related Site Remediation B. Avolatile Organic ON Sites (including Residential Non-Business Remediation Discharges) into which the potential Bencharge Compound (VOC) ON Sites (including Comparison Compared Comparison Comparison C	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 \bigcirc N \bigcirc , if Y, number; 2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Y \bigcirc N \bigcirc , if Y, date and tracking #:	he discharge? $Y \bigcirc N \odot$, if Y, number:
e) Is site/facility subject to any State permitting, license, or other action which is causing the generation of discharge? Y_O_N_O_ If Y, places list: 1. fit eitertification # assigned by the state of NH or MA:	3. Is the discharge a "new discharge" as defined by 40 CF 4. For sites in Massachusetts, is the discharge covered und permitting? $Y \odot N \odot$	$K_{122.27}$ Y \odot N \odot ler the Massachusetts Contingency Plan (MCP) and exempt from state
1. site identification # assigned by the state of NH or if Y, number: 3. EPA Construction General Permit? Y O N O. 2. permit or license # assigned: 3. EPA Construction General Permit? Y O N O. 3. state agency contact information: name, location, and 4. Individual NPDES permit? Y O N O. 3. state agency contact information: name, location, and 5. any other water quality related individual or general permit? Y O 9. Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y O N O. N b) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls. Activity Sub-Category 1. Petroleum Related Site Remediation A contriversion Discharges on Discharges into which the potential 1. Petroleum Related Site Remediation A continite Organic Compound (VOC) Only Sites 1. Petroleum Site Remediation A. Volatile Organic Compound (VOC) Only Sites 1. Non Petroleum Site Remediation A. Volatile Organic Compound (VOC) Only Sites 1. Non Petroleum Site Remediation B. Known Contamination 1. Contaminated Construction Dewatering A. Contaminated Sites	e) Is site/facility subject to any State permitting, license, or other action which is causing the generation of discharge? Y O N O	f) Is the site/facility covered by any other EPA permit, including: 1. Multi-Sector <u>General Permit?</u> <u>O</u> <u>N</u> <u>O</u> , if Y, number: <u></u> <u>C</u> <u>N</u> <u>O</u> , 2. Final Dewatering General Permit? Y <u>O</u> <u>N</u> <u>O</u> ,
2. Potner of information: name, location, and if 'f, number: 1. In's number: 0. O. 3. state agent ycontact information: name, location, and if 'f, number: 1. In's number: 0. O. 3. state agent ycontact information: name, location, and if 'f, number: 1. In's number: 0. O. B. Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y O. N O. 0. O. b) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls. Activity Sub-Category Activity Category 1. Petroleum Related Site Remediation Activity Sub-Category 1. Petroleum Related Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) 11 Non Petroleum Site Remediation A. Volatile Organic Compound (VOC) Only Sites 0. 11 Contaminated Construction Dewatering A. General Uhdary Meditional Contamination 0. 11 Contaminated Construction Dewatering B. Known Contaminated Sites E 0.	identification # assigned by t	if Y, number:
5. any other water quality related individual or general permit? Y ○ 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. h) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls. Activity Category I - Petroleum Related Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation I Non Petroleum Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation I Non Petroleum Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation B. Voor Sites with Additional Contamination I Non Petroleum Site Remediation B. Voor Sites with Additional Contamination D Contaminated Construction Dewatering A. General Urban Fill Sites B. Known Contaminated Sites	ion:	
g) Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y O N O 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 into which the potential discharge falls. I - Petroleum Related Site Remediation Activity Sub-Category I - Petroleum Related Site Remediation A. Gasoline Only Sites I I - Petroleum Related Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) II - Non Petroleum Site Remediation A. Volatile Organic Compound (VOC) Only Sites II - Non Petroleum Site Remediation B. VOC Sites with Additional Contamination II - Contaminated Construction Dewatering A. General Urban Fill Sites III - Contaminated Construction Dewatering A. General Urban Fill Sites		5. any other water quality related individual or general permit? Y O N O, if Y, number:
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 Category I - Petroleum Related Site Remediation B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) II - Non Petroleum Site Remediation B. Volatile Organic Compound (VOC) Only Sites II - Non Petroleum Site Remediation B. VOC Sites with Additional Contamination D. A. Officient Sites (including Residential Non-Business Remediation Discharges) II - Non Petroleum Site Remediation B. VOC Sites with Additional Contamination D. A. Volatile Organic Compound (VOC) Only Sites D. Sites with Additional Contamination D. C. Primarily Heavy Metal Sites D. A. General Urban Fill Sites D. A. General Urban Fill Sites	g) Is the site/facility located within or does it discharge to	an Area of Critical Environmental Concern (ACEC)? Y O N O
OITY Ac clated Site Remediation A. clated Site Remediation B. clated Site Remediation C. clated Site Remediation A. clated Site Remediation B. clated Site Remediation B. clated Site Remediation B. clated Site Remediation B.	h) Based on the facility/site information and any historica discharge falls.	I sampling data, identify the sub-category into which the potential
ering	Activity Category	Activity Sub-Category
A. C. B.	1 - Petroleum Related Site Remediation	A. Gasoline Only Sites A. Gasoline Only Sites (including Residential Non-Business Remediation Discharges) C. Petroleum Sites with Additional Contamination
ering A. General Urban Fill Sites D. B. Known Contaminated Sites	II - Non Petroleum Site Remediation	
	III - Contaminated Construction Dewatering	C s

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IV - Miscellaneous Related Discharges	harges	A. Aquifer Pump Testing to Evaluate Formerly Contaminated Sites B. Well Development/Rehabilitation at Contaminated/Formerly Contaminated Sites C. Hydrostatic Testing of Pipelines and Tanks	ted Sites
		D. Long-Term Remediation of Contaminated Sumps and Dikes E. Short-term Contaminated Dredging Drain Back Waters (if not covered by 401/404 permit)	Dikes D (if not covered
2. Discharge information.	Please provide information	2. Discharge information. Please provide information about the discharge, (attaching additional sheets as necessary) including	ssary) including:
a) Describe the discharge activities	vities for which the owner/a	for which the owner/applicant is seeking coverage:	
Temporary construction dewatering as	ng as part of demolition activities	ies	
b) Provide the following information about each discharge:	mation about each discharg	e:	
1) Number of discharge	2) What is the maximum a	2) What is the maximum and average flow rate of discharge (in cubic feet per second, $\hat{tt}^3/s)$?	ond, ft ³ /s)?
points: 1	Max. flow ^{[3.3}] Is may Average flow (include units) ^[25]	Is maximum flow a design value? Y \bigcirc N \bigcirc its) ^{2.5} Is average flow a design value or estimate? Estimate	te? Estimate
3) Latitude and longitude of each discharge within 100 feet:	ach discharge within 100 fe	et:	
pt. 1: lat 42.154164 [ong nt 3. lat	72.588194 pt.2: lat		ŝ.
pt.5: lat long		long.	
pt.7: lat long			
4) If hydrostatic testing,	5) Is the discharge intermittent	ttent <u>O</u> or seasonal <u>O</u> ?	
total volume of the	Is discharge ongoing? Y	⊙ z ○	
c) Exnected dates of discharge (mm/dd/vv): start 7/14/14	e (mm/dd/vv)• start 7/14/14	end 4/1/2017	
d) Please attach a line drawing	g or flow schematic showing	d) Please attach a line drawing or flow schematic showing water flow through the facility including:	
1. sources of intake water. 2. contri- waters(s) Flow Schematic is attached.	utri	ibuting flow from the operation. 3. treatment units, and 4. discharge points and receiving	receiving
Walcisca			

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.

		State of the second			Samula	Analutical	Minimum	Maximum daily value	ly value	Average daily value	<u>value</u>
Parameter *	<u>CAS</u> <u>Number</u>	<u>Believed</u> <u>Absent</u>	<u>Believed</u> <u>Present</u>	<u># of</u> <u>Samples</u>	Type (e.g., grab)	Method Used (method #)	Level (ML) of Test Method	concentration (ug/l)	<u>mass</u> (kg)	<u>concentration</u> (ug/l)	mass (kg)
1. Total Suspended Solids (TSS)			×	-	Grab	SM2540D	200	400			
2. Total Residual Chlorine (TRC)		×		-	Grab	300	10	DN			
3. Total Petroleum Hydrocarbons (TPH)		×		*	Grab	1664	200	DN			
4. Cyanide (CN)	57125	X			Grab	335.4	10	QN			
5. Benzene (B)	71432	X		1	Grab	8260C	1.0	DN			
6. Toluene (T)	108883	×		-	Grab	8260C	1.0	QN			
7. Ethylbenzene (E)	100414	×		-	Grab	8260C	1.0	DN			
8. (m,p,o) Xylenes (X)	108883;										
	106423; 95476; 1330207	X		~	Grab	8260C	1.0	Q			
9. Total BTEX ²	n/a	×			Grab	8260C	1.0	QN			
10. Ethylene Dibromide (EDB) (1,2- Dibromoethane) ³	106934	×		-	Grab	8260C	1.0	Q			
11. Methyl-tert-Butyl Ether (MtBE)	1634044	×		-	Grab	8260C	1.0	QN			
12. tert-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	×		-	Grab	8260C	5.0	QN			

^{*} 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 Fest Methods and Minimum Levels associated with each parameter provided in Appendix VI.

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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.

	Name of Street				-		Minimum	Maximum daily value	v value	Average daily value	value
Parameter *	CAS Number	<u>Believed</u> <u>Absent</u>	<u>Believed</u> <u>Present</u>	<u># of</u> Samples	<u>Sample</u> Type (e.g., grab)	Analytical Method Used (method #)	Level (ML) of Test Method	<u>concentration</u> (ug/)	mass (kg)	<u>concentration</u> (ug/)	mass (kg)
13. tert-Amyl Methyl Ether (TAME)	9940508	×		1	Grab	8260C	1.0	DN			
14. Naphthalene	91203	×			Grab	8260C	1.0	DN			
15. Carbon Tetrachloride	56235	×		1	Grab	8260C	1.0	DN			
16.1,2 Dichlorobenzene (o-DCB)	95501	X		1	Grab	8260C	1.0	DN			
17. 1,3 Dichlorobenzene (m-DCB)	541731	X		-	Grab	8260C	1.0	DN			
18. 1,4 Dichlorobenzene (p-DCB)	106467	X		1	Grab	8260C	1.0	DN			
18a. Total dichlorobenzene		×		1	Grab	8260C	1.0	DN			
19. 1,1 Dichloroethane (DCA)	75343	X		1	Grab	8260C	1.0	DN			
20. 1,2 Dichloroethane (DCA)	107062	×		-	Grab	8260C	1.0	DN			
21. 1,1 Dichloroethene (DCE)	75354	X		1	Grab	8260C	1.0	QN			
22. cis-1,2 Dichloroethene (DCE)	156592	×		1	Grab	8260C	1.0	DN			
23. Methylene Chloride	75092	X			Grab	8260C	1.0	DN			
24. Tetrachloroethene (PCE)	127184	X		-	Grab	8260C	1.0	DN			
25. 1,1,1 Trichloro-ethane (TCA)	71556	X		-	Grab	8260	1.0	DN			
26. 1,1,2 Trichloro-ethane (TCA)	79005	X		-	Grab	8260C	1.0	DN			
27. Trichloroethene (TCE)	79016	×		Ţ	Grab	8260C	1.0	QN			

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and the second se			The state		Comple	Andretical	Minimum	Maximum daily value	ly value	Average daily value	value
<u>Parameter *</u>	<u>CAS</u> <u>Number</u>	<u>Believed</u> <u>Absent</u>	<u>Believed</u> <u>Present</u>	<u># of</u> <u>Samples</u>	Zampie Type (e.g., grab)	Analytical Method Used (method #)	Level (ML) of Test Method	concentration (ug/l)	mass (kg)	<u>concentration</u> (ug/)	mass (kg)
28. Vinyl Chloride (Chloroethene)	75014	X		-	Grab	8260C	1.0	QN			
29. Acetone	67641	×		-	Grab	8260C	5	QN			
30. 1,4 Dioxane	123911	×		-	Grab	8260C	3	QN			
31. Total Phenols	108952	X		1	Grab	8270D	2	DN			
32. Pentachlorophenol (PCP)	87865	X		-	Grab	8270D	5	DN			
33. Total Phthalates (Phthalate esters) ⁴		×		0	Grab	8270	3	DN			
34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	117817	X		-	Grab	8270D	3	DN			
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		X		-	Grab	8270D	2	DN			
a. Benzo(a) Anthracene	56553	×		-	Grab	8270D	2	ND			
b. Benzo(a) Pyrene	50328	×		7	Grab	8270D	2	DN			
c. Benzo(b)Fluoranthene	205992	X		_	Grab	8270D	2	QN			
d. Benzo(k)Fluoranthene	207089	×		-	Grab	8270D	2	Q			
e. Chrysene	21801	×			Grab	8270D	8	QN			
f. Dibenzo(a,h)anthracene	53703	X		1	Grab	8270D	2	DN			
g. Indeno(1,2,3-cd) Pyrene	193395	X		-	Grab	8270D	2	DN			
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		X		-	Grab	8270D	3	QN			

⁴ The sum of individual phthalate compounds.

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I North and a state
<u>Believed</u> <u>Present</u>
X
×
×

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		 _	
<u>r value</u>	mass (kg)		
Average daily	<u>concentration</u> (ug/)		
ly value	mass (kg)		
Maximum dai	<u>concentration</u> (ug/l)		
Minimum	Level (ML) of Test Method		
Ambridad	Auaryucar Method Used (method #)		
-1	Type Type (e.g., grab)		
	<u># of</u> Samples		
	<u>Believed</u> <u>Present</u>		
	<u>Believed</u> <u>Absent</u>		
	CAS Number		
	Parameter *		

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

<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)? $Y \odot N \odot$	If yes. which metals? selenium
<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? Metal selenium DF 210 Metal Metal Electron DF 210	Look up the limit calculated at the corresponding dilution factor in Appendix IV. Do any of the metals in the influent have the potential to exceed the corresponding effluent limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? $Y \odot N O$ If Y, list which metals: ceiling limit from Appendix IV used based upon DF >100
4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including:	separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system: See attached Figure 3

b) Identify each	Frac. tank 🕱 Air	Air stripper 🗖	• stripper 🗖 🛛 Oil/water separator 🗖	Equalization tanks Bag filter GAC filter E	Bag filter 🗖	GAC filter 🗖
applicable treatment unit (check all that apply):	Chlorination De-	De- chlorination	Other (please describe): """' 3' 3' 9' 9' 9' 9' 9' 9' 9' 9' 9' 9' 9' 9' 9'	rauna and bear bara and bear and bara. Another as	and the set of the set	

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000016	of						ased				
No. MAC No. NHC	minute)						eptors (b		cfs	E.Coli	
NPDES Permit No. MAG910000 NPDES Permit No. NHG910000	es (gallons per minute) for the discharge and the design flow rate (s) (gallons per minute) of pm Maximum flow rate of treatment system ²⁰⁰ gpm gpm		leets as necessary:	Other (descrihe).		River.	location and location of the outfall to the receiving water: rges sequentially. on of the discharge to the indirect conveyance and the discharge to surface water distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based rface waters, drinking water supplies, and wetland areas.			quality impaired or limited water? Y \odot N \bigcirc If yes, for which pollutant(s)?	
	and the design flov stem 200	sheets):), using separate sh	Wetlands	he receiving waters	The storm drain discharges to the Chicopee River.	e receiving water: ance and the discha well as the locus of wetland areas.		ing water 140 ons.	N O If yes, fo	
	for the discharge te of treatment sy	ed (attach MSDS	receiving water(s	Storm drain 🗵	the name(s) of t	torm drain dischar	the outfall to the e indirect convey anitary sewer as ater supplies, and	Class B	10) of the receiv lilution calculatic	ted water?Y 🗿	
	allons per minute) for the discharge and the d Maximum flow rate of treatment system ²⁰⁰ gpm	used or planned to be used (attach MSDS sheets):	mation about the	Within facility (sewer)			on and location of equentially. The discharge to th ce to the nearest s vaters, drinking w	e receiving waten	ear low flow (7Q stream flow and c	impaired or limi	If yes, for which pollutant(s)?
		ves being used or	ase provide inform	Direct to receiving water	f the discharge pa	stormdrain manho	ng the site locatic the discharges se the location of th cation and distanc such as surface w	assification of the	d seven day-ten y used to support :	(d) water quality	O If yes, for w
	c) Proposed average and maximum flow ra the treatment system: Average flow rate of discharge 150 Design flow rate of treatment system 150	d) A description of chemical additives being None	5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary:	a) Identify the discharge pathway:	b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:	Effluent will be discharged to an ACOE stormdrain manhole near site.	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 recon 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 [140 Please attach any calculation sheets used to support stream flow and dilution calculations.	f) Is the receiving water a listed 303(d) water	Is there a final TMDL? $Y O N$
	c) Proposed average the treatment system: Average flow rate of Design flow rate of tr	d) A descrij None	5. Receiving	a) Identify	b) Provide	Effluent will b	c) Attach al. For mult2. For indirThe map shon USGS to	d) Provide 1	e) Provide 1 Please attac	f) Is the rec	Is there a fi

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NPDES Permit No. MAG910000 NPDES Permit No. NHG910000
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 \bigcirc B \bigcirc C \bigcirc D \bigcirc E \bigcirc F \bigcirc F \bigcirc D \bigcirc E \bigcirc F \bigcirc D \bigcirc D \bigcirc E \bigcirc F \bigcirc D \bigcirc D \bigcirc E \bigcirc F \bigcirc D \bigcirc E \bigcirc F \bigcirc D \circ
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 \odot N \odot A 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 O 2 O 3 O 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.
Analytical Certificates are attached. Based on a review of the MassDEP Resource Priority Map and the MassGIS Priority Habitat and Estimated Habitat Natural Heritage and Endangered Species Program Map, no areas of priority or estimated habitats or rare species were identified at the Site/work zone area relative to the proposed discharge (see attached maps). Therefore, it was determined that Criterion A in Section 6 (a) was applicable.

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NPDES Permit No. MAG910000 NPDES Permit No. NHG910000

ATTACHMENT II GZA AND ECS ANALYTICAL TABLES 2009 AND 2012 ANALYTICAL DATA

CHICOPEE INDUSTRIAL PARK CHICOPEE, MASSACHUSETTS

EU-7 GROUNDWATER ANALYTICAL RESULTS - MARCH 2012 PCBs

And and a second		Sample ID Sample Name	SB45913-01 MW-8	SB45913-02 MW-9	SB45913-03 MW-10	SB45913-04 MW-11	SB45913-05 MW-9 DUP
		Sample Date	3/23/2012	3/23/2012	3/23/2012	3/23/2012	3/23/2012
ANALYTE	MCP METHOD 1 GW-2 MCP ME	THOD 1 GW-3					
Aroclor-1016			0.222U	0.235U	0.211U	0.222U	0.250U
Aroclor-1221			0.222U	0.235U	0.211U	0.222U	0.250U
Aroclor-1232			0.222U	0.235U	0.211U	0.222U	0.250U
Aroclor-1242			0.222U	0.235U	0.211U	0.222U	0.250U
Arocior-1248			0.222U	0.235U	0.211U	0.222U	0.250U
Aroclor-1254		÷-	0.222U	0.235U	0.211U	0.222U	0.250U
Aroclor-1260			0.222U	0.235U	0.211U	0.222U	0.250U
Arocior 1262		÷-	0.222U	0.235U	0.211U	0.222U	0.250U
Arocior 1268			0.222U	0.235U	0.211U	0.222U	0.250U
PCBs, total	5	10	0.222U	0.235U	0.211U	0.222U	0.250U

Notes:

D = diluted.

U = Result was less than the indicated laboratory reporting limit.

All units are ug/L

- = not analyzed.

- - = no criteria provided.

CHICOPHE INDUSTRIAL PARK CHICOPHE, MASSACHUSETTS

EU-7 GROUNDWATER ANALYTICAL RESULTS - MARCH 2012 METALS

	Contraction of the Contraction	Sample ID	SB45913-01 MW-8	SB45913-02 MW-9	SB45913-03 MW-10	SB45913-04 MW-11	SB45913-05 MW-9 DUP
		Sample Name Sample Date	3/23/2012	3/23/2012	3/23/2012	3/23/2012	3/23/2012
ANALYTE	MCP METHOD 1 GW-2	MCP METHOD 1 GW-3	6				
Antimony		8,000	6U	6U	6 U	ស	സ
Arsenic		900	4U	4U	4U	4	4U
Barium		50,000	125	90.8	88.2	41.8	92.6
Cadmium		4	2.5U	2.5U	2.5U	2.5U	2.5U
Chromium		300	5U	5U	5U	5U	5U
Lead		10	7.5U	7.5U	7.5U	7.5U	7.5U
Nickel		200	5U	5U	5U	5U	5U
Vanadium		4,000	5U	5U	5U	5U	5U
Zinc		900	17.2	15	13.9	16.4	16.6

Notes:

D = diluted.

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All units are ug/L

- = not analyzed.

--= no criteria provided.

CHICOPHE INDUSTRIAL PARK CHICOPEE, MASSACHUSETTS

EU-7 GROUNDWATER ANALYTICAL RESULTS - MARCH 2012 EPH

	Contraction of the local division of the loc	Sample ID	SB45913-01	SB45913-02	SB45913-03	SB45913-04	SB45913-05
		Sample Name	MW-8	MW-9	MW-10	MW-11	MW-9 DUP
		Sample Date	3/23/2012	3/23/2012	3/23/2012	3/23/2012	3/23/2012
ANALYTE	MCP METHOD 1 GW-2	MCP METHOD 1 GW-3					
Aliphatics, C9-C18	5,000	50,000	105U	109U	116U	1100	1150
Aliphatics, C19-C36	and the second s	50,000	105U	109U	116U	110 U	115U
Aromatics, C11-C22	50,000	5,000	105U	1 09U	116 U	110U	115U
Acenaphthene	a sense a sum an	6,000	5.26U	5.43U	5.81U	5.49U	5.75U
Acenaphthylene	10,000	40	5.26U	5.43U	5.81U	5.49U	5.75U
Anthracene		30	5.26U	5.43U	5.81U	5.49U	5.75U
Benz(a)anthracene		1,000	5.26U	5.43U	5.81U	5.49U	5.75U
Benzo(a)pyrene		500	5.26U	5.43U	5.81U	5.4 9 U	5.75U
Benzo(b)fluoranthene		400	5.26U	5.43U	5.81U	5.4 9U	5.75U
Benzo(ghi)perylene		20	5.26U	5.43U	5.81U	5.4 9 U	5.75U
Benzo(k) fluoranthene		100	5.26U	5.43U	5.81U	5.49U	5.75U
Chrysene		70	5.26U	5.43U	5.81U	5.49U	5.75U
Dibenz(ah)anthracene		40	5.26U	5.43U	5.81U	5. 49U	5.75U
Fluoranthene	and a construction of the second statement of the base statement of the second	200	5.26U	5.43U	5.81U	5.49U	5.75U
Fluorene		40	5.26U	5.43U	5. 81U	5.49U	5.75U
Indeno(1,2,3-cd)pyrene		100	5.26U	5.43U	5.81U	5.49U	5.75U
Methylnaphthalene, 2-	2,000	20,000	5.26U	5.43U	5.81U	5.49U	5.75U
Naphthalene	1,000	20,000	5.26U	5.43U	5.81U	5.49U	5. 75 U
Phenanthrene	a managana na managana na managana managana managana managana managana managana managana managana managana mana Managana managana mana	10,000	5.26U	5.43U	5.81U	5.49U	5. 75U
Pyrene	nan ana ana amin'ny farita ana amin'ny faritan'i Anis.	20	5.26U	5.43U	5.8IU	5.49U	5.75U
TPH	5,000	5,000	105U	109U	116U	110U	115U

Notes:

D = diluted.

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- = no criteria provided.

CHICOPEE INDUSTRIAL PARK CHICOPEE, MASSACHUSETTS

EU-7 GROUNDWATER ANALYTICAL RESULTS - MARCH 2012 VPH

		Sample ID	SB45913-01	SB45913-02	SB45913-03	SB45913-04	SB45913-05
		Sample Name	MW-8	MW-9	MW-10	MW-11	MW-9 DUP
		Sample Date	3/23/2012	3/23/2012	3/23/2012	3/23/2012	3/23/2012
ANALYTE	MCP METHOD 1	GW-2 MCP METHOD 1 GW-3					
Aliphatics, C5-C8	3,000	50,000	75.0UD	75.0UD	75.0UD	75.0UD	75.0UD
Aliphatics, C9-C12	5,000	50,000	25.0UD	25.0UD	25.0UD	25.0UD	25.0UD
Aromatics, C9-C10	7,000	50,000	25.0UD	25.0UD	25.0UD	25.0UD	25.0UD
Benzene	2,000	10,000	5.0UD	5.0UD	5.0UD	5.0UD	5.0UD
Ethylbenzene	20,000	5,000	5.0UD	5.0UD	5.0UD	5.0UD	5.0UD
Methyl tert-butyl ether	50,000	50,000	5.0UD	5.0UD	5.0UD	5.0UD	5.0UD
Naphthalene	1.000	20,000	5.0UD	5.0UD	5.0UD	5.0UD	5.0UD
Toluene	50,000	40,000	5.0UD	5.0UD	5.0UD	5.0UD	5.0UD
Xvienes, total	9,000	5,000	10.0UD	10.0UD	10.0UD	10.0UD	10.0UD

Notes:

D = diluted.

U = Result was less than the indicated laboratory reporting limit.

All units are ug/L

- = not analyzed.

- - = no criteria provided.

TABLE 2B Summary of Groundwater Analytical Data - All Exposure Units Extractable Petroleum Hydrocarbous 154 Grove Street. Chicopee, Massachusotts

Leponse	U IPM	. Sempling Dan	Total Petroleum Hydracarbans	C9-C18 . Upphathr Hydracarbons	CI9-CM Aliphate Hydrocarbane		CI-CI Annute			Accumph-thy lear		Anthraceme	Beruca(a)- anthracene	Berro	Berntalpyren	Beneriter	4
	ANT IN I		and."	an/L	Lag		mel	-	Lan	Hell.	9	- Top		_		Age	1
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(ATAT-KANT STUDAN HOM	(0107-6007)	CAP P. CAN'S		1 1	2167	=		n (5	1	ה 0.2 ה	L	2	0.1	¢	-	50	
-		0 20101	N.N.		2								dN	2	a	9	
Caposura Ven		2-6VIV)			100	1	-	L		10 01)
- 1	ECS-28	HILD DUPUT		200	901		100	1		E	0	2		2	2	L	0
		60001/71	-		2	,		QN		QN			Ð	2	2	2	
Well Average (2009-2010)	(0102-6002)		5			+					Ļ	1	1	5		L	
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4		12,07/09	1	100		5		n	U O		U 10						
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	terre and terre		NA	QN	Q		QN	an	0	2	QN	0	Ð	4	2	2	

624601 T2 AU 6W data T2B EPH 1 4-2011

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TABLE 2A Summary of Groundwater Amalytical Data - All Exposure Units Vointike Petroleum Hydrocarbons 154 Grove Street, Chicopoe, Matsmchusetts

typents	974	sampting their	C3-C8 Aliphane Bydrecarbeov	CV-CU2 Aliphade Rydrocarbons	Rydmeerbon	Ť a			LibyDenne	Mattry Lertury heard ether	1	Contradict of the second	ä	labore	-	Volumes (mud	1
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			1 100	122	1 177		112		26.4	99		ez				1	

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TABLE 2B	Summary of Groundwater Analytical Data - All Exposure Units	Extractable Petroleum Hydrocarbons	154 Grove Street, Chicopee, Massachusetts
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Exponent	Mdi ID	Sempling Date	Benro(g.h.i)- perylese	Bence(k)-	t a	Chryster		suthness	Flue	Fluoranthene			edipyrear	-	aphthatan		-			
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	Emerand 11-14 1 Marianan 2000-2010	6.7010)	QN	9		2	F				9		ę	-	-1			1	av	
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Well Averag	Well Average (2007-2010)			9	T	2	t	-	2		2	T	2			Q	154	8	Ż	
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Expositive Un	Exposure Unit 5 Maximum Average (2009-2010)	LINE (AUGH-AUIU)		2	-	4	╞			11 0	10	2		11	n 10	10		0:	10	
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TABLE 2E Summary of Groundwater Analytical Data - All Exposure Units Polychlorinated Biphenyls (PCBa) 154 Grove Street, Chicopee, Massachusetts

trapaure 1	Well ID	Sampling Dute	Aradior 1016		Aredor 1221	Aructor 1232	5	Arother 1242	Aroctor 1248		Aroctor 1254	Arrector (260)	1260	Aroclur 1262	Arocior 1268	3	PCBA tabl	71
5		ALL STREET	J'an	-	mg/l.	Hg4		µ6'l.	Not		No.	uc'l.		J.M.	1/20	-	Hgl.	7
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	ECS-28	1 12/10/09	0.25	5		0.25	5				1	1		0.25 U		n	3.04	٦
	NIW-1	07/21/04	() 4K	5		0.1	5	0.48 U		U 0.4	2		Э	1	1		0.48	2
	AIW'4	00/30 04	0.3	5		03	5						þ	0.3 U		Þ	9	5
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Ed-2 Marin	E11-2 Maximum (2009 only)		ą	-		Q		ND			0	3.04		e	QN	-	3.04	
	FCS-11	07/21/04	0.48	E		1970	5			U R4		0.48	1	:	,		0.45	=
- -1	ECS-II	60/20/71	1	>	0.264 U	0.264	5	0.264 U			64 U	0.264	D	0.264 U		5	0.261	기
EUL3 Marda	EU-3 Marianan (2009 only)	Ι.		H		QN		QN	QN	EN .		ę		DN	ĝ	-	ę	T
	FCS-14	07/20.04	140	5	l	0.47	5					0.47	2	•	1	1	147	-1
,	ECS-14	12/07/09	Ĺ	5	0.25% U	0.258	5	0.258 U		U 0.2	58 U	0.258	D	0.258 U		5	0.256	키
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	ECS-13	07/20/mt	0.47	5		0.47	5			U 04	U 1	0.47	D	;	1	1	6.47	기
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EU-5 Maxia	EU-5 Maximum (2009 only)	8	ND	-	R	QN		QN	ę	Z	0	2		QN	2		Q	T
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	S-MW	10/0E/mj	1.1	2	1	03	5			L			D	0.3 U		2	6.0	2
	ECS-17	12:u8/09	520	5		0.25	Э	0.25 U					þ			=	20	키
	ECS-22	12/08/09	0.259	2	0.259 U	0.259	n			U 03	59 U		Э	0.259 U	_	5	0.259	P
	ECS-10	60/01/21	0.259	5		0.259	n						Э			5	0.259	P
	ECS-19	12/10/09	0.263	5		0.263	n			_			2			5	0.263	P
	9-MM	12/10/09	0.25	þ		0.25	n	0.25 U		_	S	570	Þ			5	0.25	5
	NW-7	12/10/09	0.25	2		0.25	ຄ			_		0.25	2			5	20	-
	ECS-16	60/11/21	0.35	5		0.25	D	0.25 U		U 0.2		0.25	2	0.25 U	_	2	0.25	5
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Beckground and duplicute samples are not shown Value. Exceeds Method I standard Micrograms per liter U Not detected as reporting limit presented. or due to quality control limitations ND Not detected as reporting limit presented. NA: "- Noi analyzed I. 310 CMR 40.0994(7). 2. 310 CMR 40.0996(7).

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TABLE 2F Summary of Groundwater Anabytical Data - All Exposure Ualu Metals 154 Growe Street, Chicopee, Massachusetts

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Part 16

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TABLE 2F Summary of Groundwater Analytical Data - All Exposure Units Metals 154 Grove Street, Chicopee, Mussachusetts

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every Unit Maximum (2009 early) NA NA NA NA Old CW-2 Summary ' NB	10	C-MA	L	-	-	1	1
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and 1 CW-2 Standard 7 7 0 000 1 0 1 1 CW-2 Standard 7 7 0 000 1 1 CW-2 Standard 1 CW-2 Standar	Loop of A loop of the loop of		and the second se	AF	AN I	NE	AN
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ecound and duplicate samples are not chorma when the samples are not chormal Macrogram per later Net described reporting paral producted. Net catabilished Net catabilished Net catabilished 10 CMR 40 101/4(2). 310 CMR 40 101/4(2).	Machael 3 Finner	18		1,600	1,400	50.000	20,000
	WINNERS & DOUGH	Concentingen Lun					
2	The second second	uplicate tumples art n Fruends Mathod 1 ru Microgram per litter	ust chown websed				
2	a M	Net detected at report Net detected	the trans processor.				
2	N N	Non-subliched					
1. JIO CMR 40 w/4/21. 2. JIO CMR 40 0996471.	NA	Not analyzed					
2. 310 CMR 40 0996731.	1	310 CMR 40 1~74/2	4				
	7	310 CMR 40.099617	-				

ATTACHMENT III LABORATORY CERTIFICATES – 2014



REPORT OF ANALYTICAL RESULTS

NETLAB Case Number A0618-45

Prepared for:

Attn: Craig Ellis BETA Group, Inc. 315 Norwood Park South Norwood, MA 02062

Report Date: July 20, 2014

Lab # RI010

NEW ENGLAND TESTING LABORATORY, INC. 1254 Douglas Avenue, North Providence, RI 02904 (401) 353-3420

		Ma	ssDEP Analytica	al Protocol Certifi	cation Form		
Labo	oratory Na	ame: New England	Testing Laboratory	y, Inc.	Project #: 3889		
Proie	ect Locati	on: Uniroyal – Chic	copee. MA		RTN:		
		-	•	na data soti list l ab	ooratory Sample ID Nu	mbor(s):	
	\0618-45			ng uala sel. list Lac	oratory Sample ID Nu	mber(s).	
Matrie	ces: x Gro	oundwater/Surface	Water Soil/Sed	liment 🛛 Drinking V	Vater 🗆 Air 🗆 Other:		
CAM	Protoco	ol (check all that a	oply below):				
8260 CAM		7470/7471 Hg CAM III B □	MassDEP VPH CAM IV A □	8081 Pesticides CAM V B □	7196 Hex Cr CAM VI B □	MassDEP CAM IX A	APH
8270 CAM	SVOC II B x	7010 Metals CAM III C □	MassDEP EPH CAM IV B □	8151 Herbicides CAM V C □	8330 Explosives CAM VIII A □	TO-15 VO CAM IX B	C 🛛
	Metals III A x	6020 Metals CAM III D □	8082 PCB CAM V A x	9014 Total Cyanide/PAC CAM VI A □	6860 Perchlorate CAM VIII B □	Other x	
	Affirmativ	/e Responses to (Questions A throu	ugh F are required f	for "Presumptive Certa	ainty" stat	us
Α	Custody,		ed (including temp		cribed on the Chain-of- ld or laboratory, and	x Yes	No
В		e analytical method(tocol(s) followed?	s) and all associate	ed QC requirements s	pecified in the selected	x Yes	No
с				cal response actions s formance standard no	specified in the selected n-conformances?	x Yes	No
D		Assurance and Qu			specified in CAM VII A, ition and Reporting of	x Yes	No
Е	EVPH, 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?YesNo						
F					conformances identified Questions A through E)?	x Yes	No
Res	sponses	to Questions G, F	l and I below are l	required for "Presu	mptive Certainty" stat	tus	
G	Were the protocol		r below all CAM repo	orting limits specified in	the selected CAM	x Yes	No ¹
				inty" status may not ne R 40. 1056 (2)(k) and WS	cessarily meet the data us SC-07-350.	ability and	
Н	Were all	QC performance sta	andards specified in t	the CAM protocol(s) ac	chieved?	x Yes	No ¹
I	Were res	sults reported for the	complete analyte lis	t specified in the selec	ted CAM protocol(s)?	x Yes	No ¹
¹ All I	negative r	esponses must be a	addressed in an atta	ached laboratory narra	ative.		
respo	nsible for				sed upon my personal in al report is, to the best of		
Sign	ature: <u>&</u>	hOutre		Positio	on: Laboratory Director		_
Prin	ted Name	: Richard Warila		Date [.] (5/20/2014		

SAMPLES SUBMITTED and REQUEST FOR ANALYSIS:

The samples listed in Table I were submitted to New England Testing Laboratory on July 18, 2014. 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 A0618-45.

Custody records are included in this report.

Project: Uniroyal – Chicopee MA

TABLE I, Samples Submitted

Sample ID	Date Sampled	Matrix	Analysis Requested
MW-11	6/18/14	Water	Table II

TABLE II, Analysis and Methods

ANALYSIS	PREPARATION METHOD	DETERMINATIVE METHOD
Oil and Grease	NA	EPA 1664
Total Suspended Solids	NA	2540D
Total Residual Chlorine	NA	4500CLG
Total Cyanide	NA	4500CN
Chloride	NA	4500CL
PCBs	3510C	8082A
Total Metals		
Antimony	3050B	6010C
Arsenic	3050B	6010C
Cadmium	3050B	6010C
Trivalent Chromium	NA	Calculation
Hexavalent Chromium	NA	3500CRB
Copper	3050B	6010C
Iron	3050B	6010C
Lead	3050B	6010C
Mercury	NA	7471B
Nickel	3050B	6010C
Selenium	3050B	6010C
Silver	3050B	6010C
Zinc	3050B	6010C
SVOCs	3510	8270D
VOCs	5030	8260B
1,4 Dioxane		8260B Sim

These methods are documented in:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 3rd ed., USEPA.

CASE NARRATIVE:

Sample Receipt

The samples were all appropriately cooled and preserved upon receipt. The samples were received in the appropriate containers. The chain of custody was adequately completed and corresponded to the samples submitted.

<u>Metals</u>

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.

Semi-volatile Compounds

All samples were extracted and 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.

Total Petroleum Hydrocarbons

All samples were extracted and 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.

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.

Parameter	Result, mg/l	Reporting Limit	Date Analyzed
Oil & Grease, TPH	2	2	6/19/14
Total Suspended Solids	4	2	6/19/14
Total Residual Chlorine	ND	0.01	6/19/14 @ 9:30
Total Cyanide	ND	0.01	6/19/14
Chloride	13	1	6/19/14
Hexavalent Chromium	ND	0.01	6/19/14 @ 9:30
Trivalent Chromium	ND	0.005	6/19/14

ND = Not Detected



METALS RESULTS

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

The Technical Manager of the Metals Analysis Department certifies that the results included in this section have been reviewed and approved. Any exceptions or qualifications of substance have been reported in the case narrative.



METALS RESULTS

Case Number:	A0618-45		
Sample ID:	MW-11		
Date collected:	06/18/14		
Matrix	WATER	Analyst	M/JM/SC/A
Sample Type:	Total		

	CAS	Preparative	Analytical		Reporting		Date of	Date
Parameter	Number	Method	Method	Result	Limit	Units	Preparation	Analyzed
Antimony	7440-36-0	3010A	6010C	ND	0.01	mg/l	6/19/14	6/19/14
Arsenic	7440-38-2	3010A	6010C	ND	0.01	mg/l	6/19/14	6/19/14
Cadmium	7440-43-9	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Copper	7440-50-8	3010A	6010C	ND	0.02	mg/l	6/19/14	6/19/14
Iron	7439-89-6	3010A	6010C	0.37	0.05	mg/l	6/19/14	6/19/14
Lead	7439-92-1	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Mercury	7439-97-6	NA	7470A	ND	0.0002	mg/l	6/19/14	6/19/14
Nickel	7440-02-0	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Selenium	7782-49-2	3010A	6010C	0.01	0.01	mg/l	6/19/14	6/19/14
Silver	7440-22-4	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Zinc	7440-66-6	3010A	6010C	ND	0.02	mg/l	6/19/14	6/19/14

ND indicates Not Detected.



Sample ID:	METHOD BLANK		
Matrix	WATER	Analyst	M/JM/SC/A
Sample Type:	Preparation Blank		

	CAS	Preparative	Analytical		Reporting		Date of	Date
Parameter	Number	Method	Method	Result	Limit	Units	Preparation	Analyzed
Antimony	7440-36-0	3010A	6010C	ND	0.01	mg/l	6/19/14	6/19/14
Arsenic	7440-38-2	3010A	6010C	ND	0.01	mg/l	6/19/14	6/19/14
Cadmium	7440-43-9	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Copper	7440-50-8	3010A	6010C	ND	0.02	mg/l	6/19/14	6/19/14
Iron	7439-89-6	3010A	6010C	ND	0.05	mg/l	6/19/14	6/19/14
Lead	7439-92-1	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Mercury	7439-97-6	NA	7470A	ND	0.0002	mg/l	6/19/14	6/19/14
Nickel	7440-02-0	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Selenium	7782-49-2	3010A	6010C	ND	0.01	mg/l	6/19/14	6/19/14
Silver	7440-22-4	3010A	6010C	ND	0.005	mg/l	6/19/14	6/19/14
Zinc	7440-66-6	3010A	6010C	ND	0.02	mg/l	6/19/14	6/19/14

ND indicates Not Detected.

LABORATORY CONTROL SAMPLE RECOVERY

				Internal					
Parameter	True Value	Result	Units	Recovery, %	LCL, %	UCL, %	Date Analyzed		
A /	1.00	0.05	/1	0.5	0.5	117	(10/14		
Antimony	1.00	0.85	mg/l	85	85	115	6/19/14		
Arsenic	0.20	0.17	mg/l	87	85	115	6/19/14		
Cadmium	1.00	0.89	mg/l	89	85	115	6/19/14		
Copper	1.00	0.89	mg/l	89	85	115	6/19/14		
Iron	10.00	8.56	mg/l	86	85	115	6/19/14		
Lead	1.00	0.88	mg/l	88	85	115	6/19/14		
Mercury	0.001	0.001	mg/l	107	85	115	6/19/14		
Nickel	1.00	0.88	mg/l	88	85	115	6/19/14		
Selenium	0.20	0.17	mg/l	85	85	115	6/19/14		
Silver	0.40	0.39	mg/l	98	85	115	6/19/14		
Zinc	1.00	0.85	mg/l	85	85	115	6/19/14		



RESULTS: PCBs

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.

Sample: MW-11		Analyst's Initials: BJ
Case No. A0618-45		
Date Collected: 6/18/14		
Sample Matrix: Water		
Subject: PCBs	Date Extracted	Date Analyzed
Prep Method: EPA 3510C	6/18/14	6/19/14
Analytical Method: EPA 8082A		
Compound	Concentration	Reporting Limit
	ug/l (ppb)	ug/l (ppb)
Aroclor-1016	N.D.	0.2
Aroclor-1221	N.D.	0.2
Aroclor-1232	N.D.	0.2
Aroclor-1242	N.D.	0.2
Aroclor-1248	N.D.	0.2
Aroclor-1254	N.D.	0.2
Aroclor-1260	N.D.	0.2
Aroclor-1262	N.D.	0.2
Aroclor-1268	N.D.	0.2
Surrogates:		
Compound	% Recovery	Limits
TCMX	75	30-110
DCBP	89	30-122

N.D. = Not Detected



Sample: Method Blank		Analyst's Initials: BJ
Case No. A0618-45		
Date Collected: NA		
Sample Matrix: Water		
Subject: PCBs	Date Extracted	Date Analyzed
Prep Method: EPA 3510C	6/18/14	6/19/14
Analytical Method: EPA 8082A		
Compound	Concentration	Reporting Limit
	ug/l (ppb)	ug/l (ppb)
Aroclor-1016	N.D.	0.2
Aroclor-1221	N.D.	0.2
Aroclor-1232	N.D.	0.2
Aroclor-1242	N.D.	0.2
Aroclor-1248	N.D.	0.2
Aroclor-1254	N.D.	0.2
Aroclor-1260	N.D.	0.2
Aroclor-1262	N.D.	0.2
Aroclor-1268	N.D.	0.2
Surrogates:		
Compound	% Recovery	Limits
TCMX	72	30-110
DCBP	82	30-122

N.D. = Not Detected



Sample Matrix: Water				
Subject: PCB	Date Extracted			Date Analyzed
Prep Method: EPA 3510C	6/18/14			6/19/14
Analytical Method: EPA 8082A				
Compound	Amount Spiked	Result	Recovery	Recovery
	mg/kg	mg/kg	%	Limits
Aroclor 1016	0.500	0.519	104	40-130
Aroclor 1260	0.500	0.558	112	41-132
Surrogates:				
Compound	% Recovery	Limits		
ТСМХ	87	30-110		
DCBP	77	30-122		

PCB Laboratory Control Spike



RESULTS: SEMIVOLATILE 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.

	EPA SAMPLE NO.			
	SEM	IIVOLATILE ORGANICS ANALYSIS DATA SHEET		
Lab Name:	New Eng	gland Testing Laboratory Contract: Uniroyal-Chi	M	IW-11
Lab Code:	RI010	Case No.: A0618-45 SAS No.: BETA SD	G No.:	BETA Gro
Matrix: (soil/w	vater)	WATER Lab Sample ID: N	/W-11	
Sample wt/vo	ol:	 1000 (g/ml) ML Lab File ID: B	3061806).D
Level: (low/n		LOW Date Received: 6	/18/201	4
% Moisture:	lica)			
	·	decanted:(Y/N) N Date Extracted: 6		
Concentrated	I Extract \	Volume: 1000 (uL) Date Analyzed: 6	/19/201	4
Injection Volu	ume: <u>1.</u>	0 (uL) Dilution Factor: 1	.0	
GPC Cleanup	p: (Y/N)	N pH:		
·				
		CONCENTRATION U		
CAS NC).	COMPOUND (ug/L or ug/Kg) UG/I	L	Q
62-75-	.0	n-Nitrosodimethylamine	3	U
110-86		Pyridine	2	U
108-95		Phenol	2	U
62-53-		Aniline	2	U
111-44		bis(2-Chloroethyl)ether	2	U
95-57-	8	2-Chlorophenol	2	U
541-73	3-1	1,3-Dichlorobenzene	2	U
106-46		1,4-Dichlorobenzene	2	U
95-50-		1,2-Dichlorobenzene	2	U
95-48-		2-Methylphenol	2	U
108-60		bis(2-chloroisopropyl)ether	2	U
<u> 106-44</u> 621-64		3- & 4-Methylphenol n-Nitroso-di-n-propylamine	<u>4</u> 2	UUU
67-72-		Hexachloroethane	2	U
98-95-		Nitrobenzene	2	U
78-59-		Isophorone	2	U
88-75-		2-Nitrophenol	5	U
105-67		2,4-Dimethylphenol	10	U
65-85-	0	Benzoic acid	15	U
111-91		bis(2-Chloroethoxy)methane	2	U
120-83		2,4-Dichlorophenol	5	U
120-82		1,2,4-Trichlorobenzene	2	U
91-20-		Naphthalene	2	U
106-47		4-Chloroaniline	2	UUU
<u>87-68-</u> 59-50-		Hexachlorobutadiene 4-Chloro-3-methylphenol	<u> </u>	U
<u> </u>		2-Methylnaphthalene	2	U
77-47-		Hexachlorocyclopentadiene	2	U
88-06-		2,4,6-Trichlorophenol	2	U
95-95-		2,4,5-Trichlorophenol	2	U
91-58-		2-Chloronaphthalene	2	U
88-74-		2-Nitroaniline	2	U
131-11		Dimethyl phthalate	2	U
208-96		Acenaphthylene	2	U
606-20		2,6-Dinitrotoluene	2	U
99-09-		3-Nitroaniline	2	U
83-32-	9	Acenaphthene	2	U

B

		1	С		EPA SA	MPLE NO.
	SEI	VIVOLATILE ORGAN	ICS ANALYSIS DA	TA SHEET		
Lab Name:	New En	gland Testing Laborat	ory Contract:	Uniroyal-Chi	M	W-11
Lab Code:	RI010	Case No.: A)618-45 SAS No	.: BETA S	DG No.: E	3ETA Gro
Matrix: (soil/\	water)	WATER	I at	o Sample ID:	 MW-11	
	,					
Sample wt/vo	ol:	<u>1000</u> (g/ml) <u>N</u>		o File ID:	B061806.	D
Level: (low/r	med)	LOW	Dat	te Received:	6/18/2014	<u> </u>
% Moisture:		decanted:(Y/I	N) N Dat	te Extracted:	6/19/2014	ł
Concentrated	d Extract	Volume: 1000 (u	L) Da	te Analyzed:	6/19/2014	
Injection Volu		、		ution Factor:		
-			Diit		1.0	
GPC Cleanu	p: (Y/N)	<u> </u>				
			CONCI	ENTRATION		
	_			_		0
CAS NO).	COMPOUND	(ug/L o	r ug/Kg) UG	j/L	Q
51-28-	-5	2,4-Dinitrophen	l		3	U
100-02		4-Nitrophenol	<u>, , , , , , , , , , , , , , , , , , , </u>		5	U
132-64		Dibenzofuran			2	U
121-14		2,4-Dinitrotolue	le		2	Ŭ
84-66-		Diethyl phthalat			2	Ŭ
86-73-		Fluorene			2	U
7005-		4-Chlorophenyl	phenyl ether		2	U
100-0		4-Nitroaniline			2	U
534-52	2-1	4,6-Dinitro-2-me	thylphenol		5	U
86-30-	-6	n-Nitrosodiphen	ylamine		2	U
101-5	5-3	4-Bromophenyl	phenyl ether		2	U
118-74	4-1	Hexachlorobenz	ene		2	U
87-86-	-5	Pentachlorophe	nol		5	U
85-01-	-8	Phenanthrene			2	U
120-12	2-7	Anthracene			2	U
84-74-		Di-n-butylphthal	ate		3	U
206-44		Fluoranthene			2	U
92-87-		Benzidine			60	U
129-00		Pyrene	<u> </u>		2	U
85-68-		Butyl benzyl phi			2	U
91-94-		3,3'-Dichlorober			5	U
<u> </u>		Benzo(a)anthra	cene		2	U
218-0		Chrysene	\		2	U
117-8		bis(2-Ethylhexy			10	U
117-84		Di-n-octyl phtha			3	U
<u>205-99</u> 207-08		Benzo(b)fluoran			2	UU
<u></u> 50-32-		Benzo(k)fluoran			2	U
<u> </u>		Benzo(a)pyrene Dibenz(a,h)anth			2	U
193-39		Indeno(1,2,3-cd			2	U
193-3		Benzo(g,h,i)per			2	U
131-2-	- '	Denzo(g,n,i)per			2	0

B

Lab Name:	New Eng	land Testing Laboratory Contract: Uniroyal-Chi	BSW	061914
Lab Code:	RI010	Case No.: A0618-45 SAS No.: BETA SD	G No.: E	BETA Gro
Matrix: (soil/w	vater)	WATERLab Sample ID: E	3SW0619	914
Sample wt/vo	ol:	1000 (g/ml) <u>ML</u> Lab File ID: E	3061803.	D
Level: (low/n	ned)	LOW Date Received: 6	3/18/2014	۱
% Moisture:		decanted:(Y/N)N Date Extracted: 6	3/19/2014	۱
Concentrated	l Extract \	/olume: 1000 (uL) Date Analyzed: 6	3/19/2014	<u>ا</u>
Injection Volu	ume: <u>1.</u>	D (uL) Dilution Factor: 2	1.0	
GPC Cleanu	p: (Y/N)	NpH:		
	`	CONCENTRATION U COMPOUND (ua/L or ua/Ka) UG/		0
CAS NC).	COMPOUND (ug/L or ug/Kg) UG/	<u>L</u>	Q
62-75-	9	n-Nitrosodimethylamine	3	U
110-86	6-1	Pyridine	2	U
108-95	5-2	Phenol	2	U
62-53-		Aniline	2	U
111-44		bis(2-Chloroethyl)ether	2	Ŭ
95-57-		2-Chlorophenol	2	U
541-73		1,3-Dichlorobenzene	2	U
106-46		1,4-Dichlorobenzene	2	U
95-50-		1,2-Dichlorobenzene	2	U
95-48-		2-Methylphenol	2	U
-			2	U
108-60		bis(2-chloroisopropyl)ether		
106-44		3- & 4-Methylphenol	4	U
621-64		n-Nitroso-di-n-propylamine	2	U
67-72-		Hexachloroethane	2	U
98-95-		Nitrobenzene	2	U
		Isophorone	2	U
88-75-		2-Nitrophenol	5	U
105-67		2,4-Dimethylphenol	10	U
65-85-	0	Benzoic acid	15	U
111-91		bis(2-Chloroethoxy)methane	2	U
120-83		2,4-Dichlorophenol	5	U
120-82		1,2,4-Trichlorobenzene	2	U
91-20-		Naphthalene	2	U
106-47		4-Chloroaniline	2	U
87-68-	3	Hexachlorobutadiene	2	U
59-50-	7	4-Chloro-3-methylphenol	5	U
91-57-	6	2-Methylnaphthalene	2	U
77-47-	4	Hexachlorocyclopentadiene	2	U
88-06-	2	2,4,6-Trichlorophenol	2	U
95-95-		2,4,5-Trichlorophenol	2	U
91-58-		2-Chloronaphthalene	2	U
88-74-		2-Nitroaniline	2	U
131-11		Dimethyl phthalate	2	U
208-96		Acenaphthylene	2	U
606-20		2,6-Dinitrotoluene	2	U
99-09-		3-Nitroaniline	2	U

1B

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

Acenaphthene

83-32-9

U

2

EPA SAMPLE NO.

EPA SAMPLE NO

NELTLAB

		10					EPA SA	AMPLE NO.
Lab Name:		VOLATILE ORGANICS			TA SHEE Uniroyal		BSV	V061914
Lab Name.				liaci.	UnitOyal	-011		
Lab Code:	RI010	Case No.: A0618	3-45 S/	AS No	D.: BETA	_ SD(G No.:	BETA Gro
Matrix: (soil/	water) V	VATER		La	b Sample	ID: E	3SW061	914
Sample wt/vo	ol: <u>1</u>	000 (g/ml) <u>ML</u>		La	b File ID:	В	3061803	.D
Level: (low/r	ned) <u>L</u>	OW		Da	te Receiv	ed: 6	/18/201	4
% Moisture:		decanted:(Y/N)	Ν	Da	te Extract	ed: 6	/19/201	4
Concentrated	d Extract Vo	olume: <u>1000</u> (uL)		Da	te Analyz	ed: <u>6</u>	/19/201	4
Injection Volu	ume: <u>1.0</u>	(uL)		Dil	ution Fact	tor: <u>1</u>	.0	
GPC Cleanu	p: (Y/N)	N pH:	_					
			C		ENTRATI		NITS	
CAS NO) .	COMPOUND	-		or ug/Kg)		-	Q
51-28-	-5	2,4-Dinitrophenol					5	U
100-02	2-7	4-Nitrophenol					5	U
132-64	4-9	Dibenzofuran					2	U
121-14	4-2	2,4-Dinitrotoluene					2	U
84-66-	-2	Diethyl phthalate					2	U
86-73-	-7	Fluorene					2	U
7005-		4-Chlorophenyl phe	nyl ether				2	U
100-01		4-Nitroaniline					2	U
534-52		4,6-Dinitro-2-methyl					5	U
86-30-	-6	n-Nitrosodiphenvlan	nine				2	U

7005-72-3 4-Chlorophenyl phenyl ether 2 U 100-01-6 4-Nitroaniline 2 U 534-52-1 4,6-Dinitro-2-methylphenol 5 U 86-30-6 n-Nitrosodiphenylamine 2 U 101-55-3 4-Bromophenyl phenyl ether 2 U 118-74-1 Hexachlorobenzene 2 U 87-86-5 Pentachlorophenol 5 U	
534-52-14,6-Dinitro-2-methylphenol5U86-30-6n-Nitrosodiphenylamine2U101-55-34-Bromophenyl phenyl ether2U118-74-1Hexachlorobenzene2U	
86-30-6n-Nitrosodiphenylamine2U101-55-34-Bromophenyl phenyl ether2U118-74-1Hexachlorobenzene2U	
101-55-34-Bromophenyl phenyl ether2U118-74-1Hexachlorobenzene2U	
118-74-1 Hexachlorobenzene 2 U	
97.96.5 Deptechlorenhenel E	
87-86-5 Pentachlorophenol 5 U	
85-01-8 Phenanthrene 2 U	
120-12-7 Anthracene 2 U	
84-74-2 Di-n-butylphthalate 3 U	
206-44-0 Fluoranthene 2 U	
92-87-5 Benzidine 60 U	
129-00-0 Pyrene 2 U	
85-68-7 Butyl benzyl phthalate 2 U	
91-94-1 3,3'-Dichlorobenzidine 5 U	
56-55-3 Benzo(a)anthracene 2 U	
218-01-9 Chrysene 2 U	
117-81-7 bis(2-Ethylhexyl)phthalate 3 U	
117-84-0 Di-n-octyl phthalate 3 U	
205-99-2 Benzo(b)fluoranthene 2 U	
207-08-9 Benzo(k)fluoranthene 2 U	
50-32-8 Benzo(a)pyrene 2 U	
53-70-3 Dibenz(a,h)anthracene 2 U	
193-39-5 Indeno(1,2,3-cd)pyrene 2 U	
191-24-2 Benzo(g,h,i)perylene 2 U	

WATER SEMIVOLATILE SURROGATE RECOVERY

Lab Name:	New England	Testing Laboratory	Contract:	Uniroyal-	Chicope	
Lab Code:	RI010	Case No.: A0618-45	SAS No	.: BETA	SDG No.:	BETA Gro

	EPA	S1	S2	S3	S4	S5	S6	тот
	SAMPLE NO.	#	#	#	#	#	#	OUT
01	BSW061914	33	19	79	97	118	120	0
02	LSW061914	39	23	109	123	122	126	0
03	MW-11	27	16	83	94	94	104	0

			QC LIMITS
S1	=	2-Fluorophenol	(10-81)
S2	=	Phenol-d6	(10-83)
S3	=	Nitrobenzene-d5	(30-130)
S4	=	2-Fluorobiphenyl	(35-130)
S5	=	2,4,6-Tribromophenol	(44-125)
S6	=	Terphenyl-d14	(50-130)

Column to be used to flag recovery values

* Values outside of contract required QC limits

D Surrogate diluted out

Semivolatile Water Laboratory Control Spike

Date Extracted:	6/19/2014
Date Analyzed:	6/19/2014

	Amount Spiked			Lower Recovery	••••••
	ug/L	ug/L	%	Limit	Limit
n-Nitrosodimethylamine	50.0	11.55	23	10	69
Phenol	50.0	8.53	17	10	67
Aniline	50.0	15.36	31	14	92
bis(2-Chloroethyl)ether	50.0	41.28	83	26	120
2-Chlorophenol	50.0	32.11	64	28	85
1,3-Dichlorobenzene	50.0	34.64	69	26	87
1,4-Dichlorobenzene	50.0	36.47	73	26	89
1,2-Dichlorobenzene	50.0	36.64	73	27	92
2-Methylphenol	50.0	25.93	52	30	86
bis(2-chloroisopropyl)ether	50.0	28.59	57	24	120
3- & 4-Methylphenol	50.0	21.52	43	15	80
n-Nitroso-di-n-propylamine	50.0	38.63	77	31	106
Hexachloroethane	50.0	33.07	66	24	89
Nitrobenzene	50.0	39.38	79	26	100
Isophorone	50.0	44.81	90	26	115
2-Nitrophenol	50.0	42.57	85	25	104
2,4-Dimethylphenol	50.0	37.79	76	28	114
bis(2-Chloroethoxy)methane	50.0	47.27	95	28	120
2,4-Dichlorophenol	50.0	45.38	91	28	105
1,2,4-Trichlorobenzene	50.0	43.7	87	26	98
Naphthalene	50.0	40.51	81	27	104
4-Chloroaniline	50.0	42.19	84	28	107
Hexachlorobutadiene	50.0	51.57	103	26	107
4-Chloro-3-methylphenol	50.0	40.37	81	29	116
2-Methylnaphthalene	50.0	42.41	85	27	104
Hexachlorocyclopentadiene	50.0	29.79	60	10	115
2,4,6-Trichlorophenol	50.0	51.68	103	35	114
2,4,5-Trichlorophenol	50.0	48.38	97	34	123
2-Chloronaphthalene	50.0	45.04	90	33	108
2-Nitroaniline	50.0	40.74	81	37	124
Dimethyl phthalate	50.0	50.69	101	40	119
Acenaphthylene	50.0	46.46	93	35	113
2,6-Dinitrotoluene	50.0	54.6	109	41	128
Acenaphthene	50.0	50.02	100	34	112
2,4-Dinitrophenol	50.0	53.39	107	15	130
Dibenzofuran	50.0	47.9	96	36	116
2,4-Dinitrotoluene	50.0	54.98	110	41	129
Diethyl phthalate	50.0	48.19	96	39	121

Semivolatile Water Laboratory Control Spike

Date Extracted:	6/19/2014
Date Analyzed:	6/19/2014

Fluorene	50.0	54.04	108	40	130
4-Chlorophenyl phenyl ether	50.0	59.17	118	38	130
4-Nitroaniline	50.0	43.47	87	32	130
4,6-Dinitro-2-methylphenol	50.0	56.16	112	15	125
4-Bromophenyl phenyl ether	50.0	58.34	117	36	130
Hexachlorobenzene	50.0	60.37	121	48	130
Phenanthrene	50.0	51.42	103	48	115
Anthracene	50.0	53.19	106	45	121
Di-n-butylphthalate	50.0	50.71	101	38	130
Fluoranthene	50.0	53.55	107	48	122
Pyrene	50.0	50.55	101	45	120
Butyl benzyl phthalate	50.0	49.96	100	34	130
Benzo(a)anthracene	50.0	49.75	100	52	117
Chrysene	50.0	56.15	112	47	130
bis(2-Ethylhexyl)phthalate	50.0	58.28	117	33	130
Di-n-octyl phthalate	50.0	51.22	102	16	130
Benzo(b)fluoranthene	50.0	56.55	113	45	130
Benzo(k)fluoranthene	50.0	57.41	115	46	130
Benzo(a)pyrene	50.0	55.13	110	46	130
Indeno(1,2,3-cd)pyrene	50.0	59.26	119	41	130
Dibenz(a,h)anthracene	50.0	64.65	129	48	130
Benzo(g,h,i)perylene	50.0	59.54	119	36	130

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.



Case No.: A0618-45	Client Name: Beta Group
Method: 8260	Lab Sample ID: MW-11
Matrix: (soil/water) WATER	Lab File ID: C061915.D
Sample wt/vol: <u>5.0</u> (g/ml) <u>ML</u>	Date Sampled: 6/18/2014
% Moisture	Date Analyzed: 6/19/2014
Soil Extract Volume: (uL)	Dilution Factor: 1.0
Analyst's Initials: EC	Soil Aliquot Volume: (uL)

CAS NO.	COMPOUND	UNITS:	ug/L	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

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



Case No.: A0618-45	Client Name: Beta Group
Method: 8260	Lab Sample ID: MW-11
Matrix: (soil/water) WATER	Lab File ID: C061915.D
Sample wt/vol: <u>5.0</u> (g/ml) <u>ML</u>	Date Sampled: 6/18/2014
% Moisture	Date Analyzed: 6/19/2014
Soil Extract Volume: (uL)	Dilution Factor: 1.0
Analyst's Initials: EC	Soil Aliquot Volume: (uL)

CAS NO.	COMPOUND	UNITS:	ug/L	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-lsopropyltoluene		1.0	U
75-87-3	Chloromethane		1.0	U
75-65-0	tert butyl alcohol		5.0	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

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



Case No.: A0618-45	Client Name: Beta Group
Method: 8260	Lab Sample ID: MW-11
Matrix: (soil/water) WATER	Lab File ID: <u>C061915.D</u>
Sample wt/vol: <u>5.0</u> (g/ml) <u>ML</u>	Date Sampled: 6/18/2014
% Moisture	Date Analyzed: 6/19/2014
Soil Extract Volume: (uL)	Dilution Factor: 1.0
Analyst's Initials: EC	Soil Aliquot Volume: (uL)

CAS NO.	COMPOUND	UNITS: ug/L	Q
108-20-3	Diisopropyl Ether	1.0	U
123-91-1	1,4-Dioxane	3.0	U

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



Case No.: A0618-45	Client Name:	Beta Group
Method: 8260	Lab Sample ID:	VBLK061914
Matrix: (soil/water) WATER	Lab File ID:	C061913.D
Sample wt/vol: 5.0 (g/ml) ML	Date Sampled:	6/18/2014
% Moisture	Date Analyzed:	6/19/2014
Soil Extract Volume: (uL)	Dilution Factor:	1.0
Analyst's Initials: EC	Soil Aliquot Volu	ume: (uL)

CAS NO. COMPOUND		UNITS:	ug/L	Q	
75-01-4	Vinyl Chloride		1.0	U	
74-83-9	Bromomethane				
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	

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



Case No.: A0618-45	Client Name: Beta Group	
Method: 8260	Lab Sample ID: VBLK061914	
Matrix: (soil/water) WATER	Lab File ID: <u>C061913.D</u>	
Sample wt/vol: <u>5.0</u> (g/ml) <u>ML</u>	Date Sampled: 6/18/2014	
% Moisture	Date Analyzed: 6/19/2014	
Soil Extract Volume: (uL)	Dilution Factor: 1.0	
Analyst's Initials: EC	Soil Aliquot Volume: (uL)	

CAS NO. COMPOUND		UNITS: ug/L		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	
75-87-3	Chloromethane		1.0	U	
75-65-0	tert butyl alcohol		5.0	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	

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



Case No.: <u>A0618-45</u>	Client Name:	Beta Group	
Method: 8260	Lab Sample ID:	VBLK061914	
Matrix: (soil/water) WATER	Lab File ID:	C061913.D	
Sample wt/vol: <u>5.0</u> (g/ml) <u>ML</u>	Date Sampled:	6/18/2014	
% Moisture	Date Analyzed:	6/19/2014	
Soil Extract Volume: (uL)	Dilution Factor:	1.0	
Analyst's Initials: EC	Soil Aliquot Volu	me:	(uL)

CAS NO.	COMPOUND	UNITS: ug/L	Q
108-20-3	Diisopropyl Ether	1.0	U
123-91-1	1,4-Dioxane	3.0	U

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



WATER VOLATILE SYSTEM MONITORING COMPOUND RECOVERY

Lab Name: New England Testing Lab Contract: Uniroyal - Chicop

 Lab Code:
 RI010
 Case No.:
 A0618-45
 SAS No.:
 SDG No.:
 Beta Grou

	EPA	SMC1	SMC2	SMC3	тот
	SAMPLE NO.	#	#	#	OUT
01	VLCS061914	100	101	96	0
02	VBLK061914	98	98	105	0
03	MW-11	96	98	104	0

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.

QC LIMITS

Volatile Organics Laboratory Control Spike

Date Analyzed: 6/19/14

Sample ID: VLCS061914

	Spike	Spike	Recovery,	Lower Control	Upper Control
Compound	Added	Result	%	Limit, %	Limit, %
1,1-Dichloroethene	50.0	59.9	120	70	129
Benzene	50.0	61.1	122	73	129
Trichloroethene	50.0	59.6	119	77	122
Toluene	50.0	60.5	121	75	123
Chlorobenzene	50.0	59.4	119	73	125

	mide Sieve Salmonella Carbamates	I ICMBe Berchlorate Bromate Bron	I octooded meteod electricity of the second electric terms of	
Turnaround (Business Days) 24 hr	6/18/14 5:45	N		Relinquished by: (Signature)
			BIBY 5.45	Relinquighted by (Signature)
Special instructions: List Specific Detection Limit Requirements:	Table Time Laboratory Remarks: Temp. received: 4 Cooled R		Self 6/18/14 15:50	18/ 201
استر				
Lead, Merzum, Nickel,				
Metals include: Antimony	X X X	X	× WW-11-	6/18/14/ 15:00
	±₽.		R SAMPLE I.D. B	DATE TIME O
Le REMARKS	<+->		Hanscom, Craig Ellis, Jay Boudrean Hanscom	REPORT TO: PH HAI INVOICE TO: PH HA
Te the	×\${\$3,			CLIENT BETA GRUP
Test of the second seco			PROJECT NAMELLOCATION Unitroyal - Chicopee MA	PROJ. NO. PROJE
222 2222 2222 2222 24 24 24 24 2		CHAIN OF CUSTODY RECORD	NEW ENGLAND TESTING LABORATORY, INC. 254 Douglas Avenue Vorth Providence, RI 02904 1-888-863-8522	NEW ENGLAND TES [*] 1254 Douglas Avenue North Providence, RI 02904 1-888-863-8522
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**Netlab subcontracts the following tests: Radiologicals, Radon, Asbestos, UCMRs, Perchlorate, Bromate, Bromide, Sieve, Salmonella, Car

# ATTACHMENT IV

# 7Q10 DATA, MASSGIS, NOAA AND FWS LETTERS

### **CHICOPEE RIVER (SEGMENT MA36-23)**

Location: Red Bridge Impoundment Dam to Wilbraham Pumping Station (old WWTP), Wilbraham/Ludlow Segment Length: 3.8 miles Classification: Class B, Warm Water Fishery, CSO

This segment is on the Massachusetts Year 2006 Integrated List of Waters – Category 5, "Waters requiring a TMDL". Pollutants needing TMDLs: pathogens (MassDEP 2007b).

The MassDEP awarded money for the 604(b) grant entitled Chicopee River Watershed Basin Assessment. This project will address watershed assessment needs in the communities of Chicopee, Ludlow, Springfield, and Wilbraham that fall within the Chicopee River Basin. Stormwater infrastructure components will be identified, compiled into a database, and mapped; existing BMPs will be mapped and recommendations for future BMP implementation will be generated; existing water quality data will be compiled into a comprehensive database and analyzed to determine data gaps and to recommend future sampling efforts; and local water quality protection ordinances and bylaws will be reviewed and draft water protection bylaws prepared for communities within the study area.

#### FERC

Western Mass Electric Co. (Consolidated Edison Energy), Red Bridge Impoundment Station, is a FERC-exempt facility (FERC Exempt #10676) operating a 3,600-Kilowatt hydroelectric power station on the Chicopee River in Wilbraham (FERC 20 December 2000). Under its exempt status, the facility is required to release a continuous flow of 237 cfs from the Red Bridge Impoundment Dam. This facility is permitted to draw down the Red Bridge Impoundment to one-foot below crest from April to June and two-feet below crest during the remainder of the year. In 1997 MA DFW reached agreement with Consolidated Edison Energy, MA, on an interim measure, that their Red Bridge Impoundment Station could use between 140 – 300 cfs if a constant spillage is maintained over the spillway. The water levels at Red Bridge Impoundment are monitored and recorded and fluctuations are limited to three inches with a minimum flow released over the entire width of the spillway (Kleinschmidt Associates and CEEI 1999). In a 1998 letter to Consolidated Edison Energy, Inc. the USFWS described the minimum continuous flow release method at the Red Bridge Impoundment Station as inadequate (McCollum 2001). A slide gate has been installed at the Red Bridge Impoundment to ensure a more reliable minimum continuous flow release (Slater 2007).

I. Maxmat Co. (176 Cottage St., Wilbraham), Collins Dam Station, is a FERC-exempt facility (FERC Exempt #6544) operating a 1,500-Kilowatt hydroelectric power station on this segment of the Chicopee River (FERC 20 December 2000). The dam has a hydroelectric facility leased by Swift River Co., which, for the most part, maintains minimum flows of approximately 200 cfs. The Collins Dam was built in 1985 and is eight feet tall with four-foot flashboards.

## WATER WITHDRAWALS AND PERMITTED DISCHARGES

### WMA (Appendix E, Table E1)

Based on the available information there are no WMA regulated water withdrawals affecting this segment.

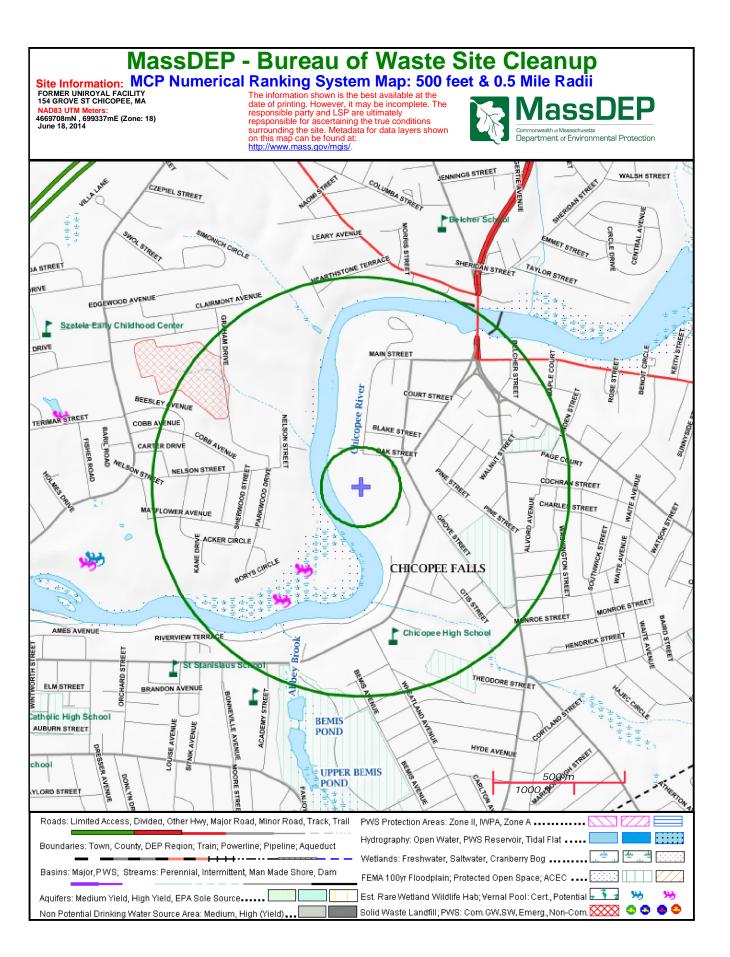
#### NPDES SURFACE WATER DISCHARGES (APPENDIX D, TABLE D1)

Consolidated Edison Energy Massachusetts Inc. (CEEMI) (MA0035823)

### DESIGNATED USE ASSESSMENT

#### Aquatic Life Use

Habitat and Flow Flow is regulated by two hydropower projects (discussed above) on this segment.





## **United States Department of the Interior**

FISH AND WILDLIFE SERVICE New England Ecological Services Field Office 70 COMMERCIAL STREET, SUITE 300 CONCORD, NH 3301 PHONE: (603)223-2541 FAX: (603)223-0104 URL: www.fws.gov/newengland



Consultation Tracking Number: 05E1NE00-2014-SLI-0431 Project Name: Former Uniroyal

June 18, 2014

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having

similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan

(http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and

http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



Project name: Former Uniroyal

## **Official Species List**

## **Provided by:**

New England Ecological Services Field Office 70 COMMERCIAL STREET, SUITE 300 CONCORD, NH 3301 (603) 223-2541 http://www.fws.gov/newengland

Consultation Tracking Number: 05E1NE00-2014-SLI-0431

Project Type: ** Other **

**Project Description:** Completing a RGP NPDES permit in order to conduct dewatering activities on a MassDEP listed disposal site as part of a building demolition project on a parcel with abandoned mill buildings



Project name: Former Uniroyal

### **Project Location Map:**



Project Coordinates: MULTIPOLYGON (((-72.5885571 42.1548754, -72.5885573 42.1548754, -72.5885649 42.1548769, -72.5885714 42.1548812, -72.5885757 42.1548877, -72.5885773 42.1548953, -72.5885758 42.1549029, -72.5885716 42.1549094, -72.5885651 42.1549138, -72.5885575 42.1549154, -72.5885457 42.1549155, -72.5885555 42.1549715, -72.5885553 42.1549794, -72.5885522 42.1549865, -72.5885465 42.1549919, -72.5885393 42.1549947, -72.5885314 42.1549945, -72.5885243 42.1549914, -72.5885189 42.1549857, -72.5885161 42.1549785, -72.5885051 42.154916, -72.585534 42.1549473, -72.5855457 42.1549459, -72.5855392 42.1549416, -72.5855348 42.1549352, -72.5847194 42.1530263, -72.5847178 42.1530188, -72.5847191 42.1530114, -72.584723 42.1530049, -72.5847291 42.1530004, -72.5847365 42.1529984, -72.5873329 42.1528234, -72.5873408 42.1528245, -72.5873477 42.1528287, -72.5883347 42.1537354, -72.5883387 42.1537405, -72.5883409 42.1537466, -



Project name: Former Uniroyal

72.5885387 42.1548754, -72.5885571 42.1548754), (-72.5884982 42.154876, -72.5883027 42.1537602, -72.587327 42.1528639, -72.5847673 42.1530365, -72.5855663 42.1549072, -72.5884982 42.154876)))

Project Counties: Hampden, MA

http://ecos.fws.gov/ipac, 06/18/2014 02:40 PM



Project name: Former Uniroyal

## **Endangered Species Act Species List**

There are a total of 0 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed on the **Has Critical Habitat** lines may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

There are no listed species identified for the vicinity of your project.



Project name: Former Uniroyal

## Critical habitats that lie within your project area

There are no critical habitats within your project area.

http://ecos.fws.gov/ipac, 06/18/2014 02:40 PM

## Craig Ellis

From: Sent: To: Subject: Christine Vaccaro - NOAA Federal <christine.vaccaro@noaa.gov> Friday, June 20, 2014 9:04 AM Craig Ellis Re: Chicopee River

Hi Craig,

It looks like you are relatively far upstream from the confluence with the CT River. The CT river provides habitat for shortnose sturgeon (mainstem, not within tributaries) and Atlantic sturgeon (well downstream within the state of CT). As such, we don't expect any species listed by us to be exposed to any effects of your project.

Cheers, Chris

Chris Vaccaro Fisheries Biologist Protected Resources Division NOAA Fisheries Gloucester, MA Phone: 978-281-9167 Email: christine.vaccaro@noaa.gov

On Fri, Jun 20, 2014 at 8:37 AM, Craig Ellis <<u>CEllis@beta-inc.com</u>> wrote:

Hi Christine,

I have attached a map showing the site location. The property is the former Uniroyal mill complex at 154 Grove Street in Chicopee, MA. The discharge point for dewatering under the NPDES RGP will be on the east side of the river adjacent to the "+" symbol. I also included, in case helpful, the email from NMFS from 2007, for discharge at the same location. Please let me know if you need any additional information.

Thanks,

Craig

Craig Ellis, LSP

Senior Project Manager

BETA Group, Inc.

T: 781.255.1982

CEllis@BETA-Inc.com

www.BETA-Inc.com



From: Christine Vaccaro - NOAA Federal [mailto:<u>christine.vaccaro@noaa.gov]</u> Sent: Thursday, June 19, 2014 9:24 AM To: Craig Ellis Subject: Chicopee River

Hi Craig,

Julie Crocker forwarded your message along to me. Could you email a map to me showing where your discharge location in the Chicopee River is?

Thanks,

Chris

Chris Vaccaro Fisheries Biologist Protected Resources Division NOAA Fisheries

Gloucester, MA Phone: <u>978-281-9167</u> Email: <u>christine.vaccaro@noaa.qov</u>

Confidentiality Notice:

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that is confidential. If you are not the intended recipient(s), you may not disclose,

copy, distribute, rely upon, or use its contents. Please reply to the sender immediately and delete this message. Thank you for your cooperation.

### Memorandum of Agreement Submitted to the Advisory Council on Historic Preservation Pursuant to 36 CFR Part 800 Regarding the proposed demolition and redevelopment of the Fisk Tire/Uniroyal site, 154 Grove Street, Chicopee, Massachusetts

WHEREAS, the City of Chicopee, by and through the Office of Community Development, proposes to use Community Development Block Grant funds from the US Dept. of Housing & Urban Development to remove a public safety hazard, reduce blight and encourage appropriate development at the former Fisk Tire / Uniroyal plant at 154 Grove St. in Chicopee Falls; and

WHEREAS, the Massachusetts Historical Commission, in its capacity as the State Historic Preservation Office, has determined that the Fisk Tire / Uniroyal complex is eligible for listing on the State and National Registers of Historic Places under criterion A (industrial history); and

WHEREAS, the City of Chicopee has submitted a plan to demolish Buildings 7, 8, 15, 27, 28, 33, 42, and 43 at the Fisk Tire / Uniroyal plant due to severe structural instability; environmental contamination; and documented infeasibility for reuse; and

WHEREAS, the City of Chicopee has consulted with the Massachusetts Historical Commission pursuant 36 CFR Part 800, regulations seeking to avoid, minimize or mitigate adverse effects on historic properties; and

WHEREAS, the City of Chicopee has determined that the proposed action by the City of Chicopee will have an adverse effect through the demolition of historic properties (36 CFR Part 800); and

WHEREAS, the Chicopee Historical Commission has participated in the consultation and has been invited to concur in this Memorandum of Agreement; and

WHEREAS, the parties have agreed that no feasible or prudent alternative to demolition exists that would avoid or minimize the adverse effect of the project;

NOW, THEREFORE, the City of Chicopee (City) and the Massachusetts Historical Commission (MHC) agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on the historic properties.

#### Stipulations

The City of Chicopee will ensure the following measures are carried out:

- 1. DEMOLITION The City of Chicopee shall be permitted to move forward with the demolition of Buildings 7, 8, 15, 27, 28, 33, 42 and 43 (only) immediately upon execution of this Memorandum of Agreement.
- 2. ENCOURAGE REUSE OF BUILDINGS #25 AND #26 The City of Chicopee shall encourage the reuse of the remaining two buildings in the complex, Building #25 and Building #26, in the request for developer interest and subsequent development proposal(s).
- 3. REDEVELOPMENT REVIEW At such time the City of Chicopee is prepared to solicit requests for developer interest or development proposals for the Fisk Tire / Uniroyal site redevelopment, the City shall provide MHC the opportunity to review and comment on the solicitation, and provide input on its stated goals and objectives for redevelopment.

4. PUBLIC COMMENT - If at any time during the implementation of the measures stipulated in this agreement, a written objection should be submitted to the City of Chicopee by the Massachusetts Historical Commission, the Chicopee Historical Commission or a member of the public, the City shall take the objection into account and may consult with the Massachusetts Historical Commission, the Chicopee Historical Commission or the objecting party as needed to resolve the objection

Execution and acceptance of this Memorandum of Agreement by an authorized representative of the City of Chicopee and the Massachusetts Historical Commission and implementation of its terms shall constitute evidence that the City has afforded MHC the opportunity to comment on the proposed project and its effect on historic properties and that the City has taken into account the effect of the undertaking on historic properties in compliance with 36 CFR Part 800.

Massachusetts Historical Commission:

By:

Brona Simon

Brona Simon, Executive Director State Historic Preservation Officer State Archaeologist

City Of Chicopge: Mar By:

Dy.

Michael D. Bissonnette, Mayor

Approved as to Form:

By:

'Karen Betournay,' City Solicitor

**Consulting Party:** 

By:

Stephen Jendrysik, Chairman Chicopee Historical Commission