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

VIA EMAIL

July 13, 2017

Eric Harstad
John Moriarty & Associates, Inc.
3 Church Street
Winchester, MA 01890
eharstad@jm-a.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization # MAG910714, for the 399 Congress Street site located in Boston, MA

Dear Mr. Harstad:

Based on the review of a Notice of Intent (NOI) dated June 5, 2017 submitted by McPhail Associates, LLC. for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes John Moriarty & Associates, Inc., as the named operator, to discharge in accordance with the provisions of the RGP from this site via the City of Boston storm sewer system[1] to Boston Inner Harbor (MA70-02). The authorization number is listed above. The effective date of coverage is the date of this authorization letter.

Enclosed with this RGP authorization to discharge is a summary of the applicable parameters and effluent limitations for your activity category III, contaminated site dewatering discharge. A dilution factor of zero (i.e., 1:1) was used in calculating effluent limits applicable to the proposed discharge from this site. Please note that this summary does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the RGP, including influent and effluent monitoring, record keeping, and reporting requirements. Please ensure that sufficiently sensitive test methods are used for all sample analyses conducted for this permit. For the complete general permit, see EPA's RGP website.[2]

This EPA general permit and authorization to discharge will expire on **April 8, 2022**, or upon Notice of Termination (NOT), whichever occurs first. However, in accordance with Part 5.3 of the general permit, your permit coverage will be administratively continued until issuance of a new RGP. Please note that you must submit a NOT within thirty (30) days of the termination of the discharge. You have reported your discharges will terminate in June 2018. Because your discharge is not expected to last twelve (12) months or more, EPA expects you will not to be subject to NetDMR reporting requirements. See Part 4.6 and 5.2 of the RGP, and Appendix IV, Part 3 for more information regarding reporting requirements.

[1] The operator is responsible for obtaining permission to discharge to this system, prior to initiating discharges. EPA's authorization to discharge does not convey any such permission.
[2] http://www.epa.gov/region1/npdes/rgp.html.

In accordance with Part 2.2.1 of the RGP and using the calculation methodology included in Appendix V, EPA corrected the calculated water quality-based effluent limitations (WQBELs) applicable to this proposed discharge. The cause of the calculation error was identified as the entry of a value of 2.3 for freshwater upstream flow in the fillable electronic format submitted with the NOI, an entry which does not apply to a saltwater discharge. The reason for these corrections is to determine which WQBELs apply to the proposed discharge to saltwater (i.e., at zero dilution). Based on the revised calculations, your authorization to discharge includes a WQBEL for total copper of 3.7 µg/L.

Please ensure that sufficiently sensitive test methods are used for all sample analyses conducted for this permit. To be considered sufficiently sensitive, test methods must achieve minimum levels for analysis for a given parameter that is no greater than the effluent limitation for that parameter, unless otherwise specified in the RGP for that parameter. Where no effluent limitation applies, EPA has provided the ML required with the enclosed summary.

Thank you in advance for your cooperation in this matter. Please contact Shauna Little at (617) 918-1989 or little.shauna@epa.gov, if you have any questions.

Sincerely,

Thelma Murphy

Thelma Murphy, Chief
Storm Water and Construction Permits Section

Enclosure

cc: William J. Burns, LSP, McPhail Associates, LLC., via email
Brian Fong-Murdock, McPhail Associates, LLC., via email
Kirk W. Seaman, McPhail Associates, LLC., via email
Cathy Vakalopoulos, MassDEP, via email
Boston Water & Sewer Commission

Table 1: Authorization Information

Permit Number	MAG910714
Receiving Water	Boston Inner Harbor
Outfall Number	Outfall 001 to City of Boston SDO-202
Monitoring Frequency	See Part 4.1.2 of the RGP
Reporting Requirement	See Part 4.6.1 of the RGP; NetDMR not required

Table 2: Chemical-Specific Effluent Limitations and Monitor-Only Requirements[1]

Parameter	Effluent Limitation
A. Inorganics	
Ammonia[2]	Report mg/L
Chloride[3]	Report µg/L
Total Suspended Solids	30 mg/L
Antimony[4]	206 µg/L
Arsenic[4]	104 µg/L
Cadmium[4]	10.2 µg/L
Chromium III[4]	323 µg/L
Chromium VI[4]	323 µg/L
Copper[4]	3.7 µg/L
Iron[4]	5,000 µg/L
Lead[4]	160 µg/L
Mercury[4]	0.739 µg/L
Nickel[4]	1,450 µg/L
Selenium[4]	235.8 µg/L
Silver[4]	35.1 µg/L
Zinc[4]	420 µg/L
D. Non-Halogenated Semi-Volatile Organic Compounds	
Total Group I Polycyclic Aromatic Hydrocarbons[5]	1.0 µg/L
Benzo(a)anthracene[5]	Report µg/L
Benzo(a)pyrene[5]	Report µg/L
Benzo(b)fluoranthene[5]	Report µg/L
Benzo(k)fluoranthene[5]	Report µg/L
Chrysene[5]	Report µg/L
Dibenzo(a,h)anthracene[5]	Report µg/L
Indeno(1,2,3-cd)pyrene[5]	Report µg/L
Total Group II Polycyclic Aromatic Hydrocarbons	100 µg/L
Naphthalene	20 µg/L

Table 2 Notes:

[1] The following abbreviations are used in Table 2, above:
- [a] mg/L = milligrams per liter
- [b] µg/L = micrograms per liter

[2] The minimum level (ML) for analysis of ammonia must be less than or equal to 0.1 mg/L.

[3] The ML for analysis of chloride must be less than or equal to 230 mg/L.

[4] The limitation for this parameter is on the basis of total recoverable metal in the water column.

[5] The ML for analysis of group I PAHs must be less than or equal to 0.1 µg/L.

Table 3: Effluent Flow Limitation

Effluent Flow	**Effluent Limitation**
	0.144 MGD

Table 3 Notes

[1] The following abbreviations are used in Table 3, above:
[a] MGD = million gallons per day

Table 4: pH Limitations for Discharges in Massachusetts

Receiving Water Class	**Effluent Limitation**
Saltwater	6.5 to 8.5 SU

Table 4 Notes

[1] The following abbreviations are used in Table 4, above:
[a] SU = standard units