



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

VIA EMAIL

August 18, 2017

Matt Young
Cumberland Farms, Inc.
165 Flanders Road
Westborough, MA 01581
myoung@cumberlandfarms.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization # MAG910729, for the Cumberland Farms, Inc. #2439 site located in Attleboro, MA

Dear Mr. Young:

Based on the review of a Notice of Intent (NOI) dated July 7, 2017 submitted by ATC Group Services, LLC. for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Cumberland Farms, Inc., as the named operator, to discharge in accordance with the provisions of the RGP from this site via City of Attleboro storm sewer system¹ to an unnamed tributary to Bungay River (MA52-06_2008). 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 I, petroleum-related site remediation 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 October 2017. 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 these systems, prior to initiating discharges. EPA's authorization to discharge does not convey any such permission.

² <http://www.epa.gov/region1/npdes/rgp.html>.

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, Chief
Storm Water and Construction Permits Section

Enclosure

cc: Keith Sullivan, LSP, ATC Group Services, LLC., via email
Rachel Stevens, ATC Group Services, LLC., via email
Cathy Vakalopoulos, MassDEP, via email
City of Attleboro Department of Public Works

GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

Table 1: Authorization Information

Permit Number	MAG910729
Receiving Water	Unnamed tributary to Bungay River
Outfall Number	Outfall 001 to City of Attleboro
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 Requirements¹

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	242 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
B. Non-Halogenated Volatile Organic Compounds	
Total BTEX	100 µg/L
Benzene	5.0 µg/L
Acetone	7.97 mg/L
Phenol	1,080 µg/L
C. Halogenated Volatile Organic Compounds	
1,1 Dichloroethylene	3.2 µg/L
Trichloroethylene	5.0 µg/L
Tetrachloroethylene	5.0 µg/L
Cis-1,2 Dichloroethylene	70 µg/L
Vinyl Chloride	2.0 µg/L
D. Non-Halogenated Semi-Volatile Organic Compounds	
Total Group I Polycyclic Aromatic Hydrocarbons ⁵	Report 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 $\mu\text{g}/\text{L}$
Dibenzo(a,h)anthracene ⁵	Report $\mu\text{g}/\text{L}$
Indeno(1,2,3-cd)pyrene ⁵	Report $\mu\text{g}/\text{L}$
Total Group II Polycyclic Aromatic Hydrocarbons	100 $\mu\text{g}/\text{L}$
Naphthalene	20 $\mu\text{g}/\text{L}$
F. Fuels Parameters	
Total Petroleum Hydrocarbons	5.0 mg/L
tert-Butyl Alcohol	120 $\mu\text{g}/\text{L}$

Table 2 Notes:

¹ The following abbreviations are used in Table 2, above:

^a mg/L = milligrams per liter

^b $\mu\text{g}/\text{L}$ = 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 $\mu\text{g}/\text{L}$.

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
Freshwater	6.5 to 8.3 SU

Table 4 Notes

¹ The following abbreviations are used in Table 4, above:

^a SU = standard units