



Proactive by Design

GEOTECHNICAL

ENVIRONMENTAL

ECOLOGICAL

WATER

CONSTRUCTION
MANAGEMENT

249 Vanderbilt Avenue
Norwood, MA 02062

T: 781.278.3700

F: 781.278.5701

F: 781.278.5702

www.gza.com



October 31, 2017
File No. 01.0173060.52

Ms. Shauna Little
United States Environmental Protection Agency – Region 1
5 Post Office Square, Mail Code OEP06-4
Boston, Massachusetts 02109-3912

Re: Submittal of Notice of Change (NOC)
Remediation General Permit (RGP) #MAG910722
Eversource South Boston Pipe Type Cable 106-526,527 Repair Project
East 2nd Street between H Street and K Street
South Boston, Massachusetts 02127

Dear Ms. Little:

GZA GeoEnvironmental, Inc. (GZA), on behalf of our Client, NStar Electric Company d/b/a Eversource Energy (Eversource), is submitting the attached Notice of Change (NOC; Appendix A) for the Remediation General Permit (RGP) #MAG910722 for the South Boston Pipe Type Cable (PTC) 106-526,527 Repair Project (the Site) located on East 2nd Street between H Street and K Street in South Boston, Massachusetts.

BACKGROUND

PTC 106-526,527 is an underground 345kV electric line between Stations 106 and 315 in South Boston. Due to heat generation during high ambient temperatures and/or electric loads, the line is contained in a pipe with circulating dielectric fluid referred to as Pipe Type Cable Oil (PTCO). Eversource first observed a loss of PTCO from an oil reservoir at Station 385 on March 6, 2017. By March 7, 2017, a leak had been identified near the intersection of H Street and 5th Street and the repair was completed soon thereafter. Massachusetts Department of Environmental Protection (MassDEP) assigned Release Tracking Number (RTN) 3-34074 and an Immediate Response Action (IRA) has been underway since that time. Following that repair, two additional leaks were located near the intersection of H Street and H Street Place and repaired on April 26, 2017. MassDEP assigned RTN 3-34144 to this release and an additional IRA is in progress. A fourth section of leaking pipe is believed to exist near the intersection of I Street and 2nd Street. Eversource personnel have been working in this area since separate phase PTCO within an excavation was discovered on May 4, 2017. Due to the depth of this section of PTC line (approximately 20 feet below ground surface), the repair work has taken significantly longer to complete compared to the other releases. MassDEP assigned RTN 3-34233 to this release and an IRA is in progress.

CURRENT REPAIR WORK AND DEWATERING OPERATIONS

Eversource is currently conducting repairs on the portions of the PTC which are leaking PTCO. Eversource believes the I Street and 2nd Street location is the last leak location, though it cannot be confirmed until the repair is completed. Depth to groundwater in this area is generally between 15 and 18 feet below ground surface (bgs) and the depth to the PTC is approximately 20 bgs. Prior to the RGP, Eversource collected dewatered groundwater in fractional tanks and disposed the groundwater off Site using a licensed waste hauler.



In June 2017, GZA submitted a NOI to request authorization for treating the dewatered groundwater and discharging to the reserve channel adjacent to outfall BOS 078. RGP #MAG910722 was authorized on July 25, 2017 with an anticipated project end date of October 31, 2017. A groundwater treatment system was installed at the Site in July 2017, including an 18,000-gallon open top weir tank, a vactor truck for oil skimming, two (2) 21,000-gallon weir frac tanks, a bag filter unit, an organoclay vessel, a bone charcoal vessel, and an activated carbon vessel. Treated water is currently discharged to the Boston Inner Harbor on a 7 day a week, 24 hours a day basis. GZA personnel collected the first set of influent and effluent samples from the treatment system on July 26, 2017. In accordance with RGP monitoring requirements, additional influent, midpoint, and effluent samples were collected from the treatment system on July 28th, August 2nd, August 9th, August 15th, September 13th, October 12th, and October 23rd.

NOTICE OF CHANGE

Because additional time is needed to locate and repair the leaks in the PTC, dewatering operations will need to continue beyond the original termination month of October 2017. One leak has been repaired and two additional areas have been inspected for the presence of leaks by Eversource personnel. The new estimated date of completion is March 31, 2018. No other changes to the RGP are necessary at this time. The NOC form is included as Appendix A.

Please do not hesitate to contact the undersigned at (781) 278-3700 if you have any questions or require further information.

Sincerely,
GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'James Roehrig'.

James Roehrig
Assistant Project Manager

A handwritten signature in blue ink, appearing to read 'John A. Colbert'.

John A. Colbert, PE
Senior Project Manager

A handwritten signature in blue ink, appearing to read 'Gregg McBride'.

Gregg McBride, LSP
Senior Principal

Attachments: Appendix A – EPA Notice of Change Form

cc: Eric Lamontagne, Eversource Energy



Appendix A: Notice of Change Form

II. Suggested Format for the Remediation General Permit Notice of Change (NOC)

A. General site information

1. NPDES permit number assigned by EPA: MAG910722			
2. Name of site: Eversource South Boston - Pipe Type Cable (PTC) 106-526, 527 Repair Project		Site address: 2nd Street between I Street and K Street Street:	
		City: South Boston	State: MA Zip: 02127
3. Site owner Eversource Energy Owner is (check one): <input type="checkbox"/> Federal <input type="checkbox"/> State/Tribal <input checked="" type="checkbox"/> Private <input type="checkbox"/> Other, if so, describe:		Contact Person: Eric Lamontagne	
		Telephone: 339-987-7018	Email: eric.lamontagne@eversource.com
		Mailing address: 760 Main Street Street:	
		City: Walpole	State: MA Zip: 02081
4. Site operator, if different than owner Clean Harbors Environmental Services		Contact Person: Edwin Robert Paul, Jr.	
		Telephone: 800-645-8265	Email: paulb@cleanharbors.com
		Mailing address: 609 Pleasant Street Street:	
		City: Weymouth	State: MA Zip: 02189
5. Discharge identification: Catch basin located on Eversource Station 385 property		Discharge location: 42°20'23.83"N, 71° 2'19.93"W	Receiving water(s): Boston Inner Harbor (MA 70-02)

B. Type of change(s) requested

Requested change (check all that apply):	
<input type="checkbox"/>	1. Request for reduction in monitoring requirements to no less than once per year, based on monitoring data attached in accordance with Appendix IV, Part 2 instructions. Written approval by EPA is required for this change to be effective.
<input type="checkbox"/>	i. Influent monitoring requirement reduction based on monitoring data for six (6) consecutive months and ten (10) samples.
<input type="checkbox"/>	ii. Effluent monitoring requirement reduction based on monitoring data for six (6) consecutive months and ten (10) samples that are in compliance with the RGP effluent limitations, and data and BMP requirements.
<input type="checkbox"/>	2. Request for site-specific effluent flow limitation, which will not exceed 1.0 MGD or the design flow of the treatment system, or site-specific monitoring requirement that eliminates flow meter requirement based on written rationale attached in accordance with Appendix IV, Part 2 instructions. Written approval by EPA is required for this change to be effective.
<input type="checkbox"/>	3. Request for a change in pH range approved by NHDES, based on supporting documentation attached in accordance with Appendix IV, Part 2 instructions. Written approval by EPA is required for this change to be effective.
<input type="checkbox"/>	4. Request for change in authorized pollutants or pollutant parameters, based on monitoring data attached in accordance with Appendix IV, Part 2 instructions. This type of change requires written approval by EPA. Additional effluent limitations and/or monitoring requirements may apply.
<input type="checkbox"/>	5. Request to discharge chemical(s) and/or additive(s) that were not disclosed in the NOI submitted for the site, based on written rationale and/or monitoring data attached in accordance with Appendix IV, Part 2 instructions. Written approval by EPA is required for this change to be effective.
<input checked="" type="checkbox"/>	6. Change to administrative information. Supporting documentation is attached in accordance with Appendix IV, Part 2 instructions.
<input type="checkbox"/>	7. Notification of a change in discharge location. The receiving water information submitted with the NOI for the site remains unchanged. Supporting documentation is attached in accordance with Appendix IV, Part 2 instructions.
<input type="checkbox"/>	8. Notification of a change in activity area. The receiving water information submitted with the NOI for the site and the operator named in the authorization to discharge remain unchanged. Any change in treatment or discharge location are also included in the NOC, or are unchanged. Supporting documentation is attached in accordance with Appendix IV, Part 2 instructions.
<input type="checkbox"/>	9. Notification of a change to a treatment system or process that adds or removes any major component. Supporting rationale is attached in accordance with Appendix IV, Part 2 instructions.
<input type="checkbox"/>	10. Notification of a temporary cessation of discharge greater than 90 days. Supporting rationale is attached in accordance with Appendix IV, Part 2 instructions.

C. Certification requirement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Notification provided to the appropriate State, including a copy of this NOC.

Check one: Yes ☒ No ☐

Notification has been provided to the municipality in which the discharge is located, including a copy of this NOC, if requested.

Check one: Yes ☒ No ☐

Notification has been provided to the owner of a private or municipal storm sewer system, if such system is used for site discharges, including a copy of this NOC, if requested.

Check one: Yes ☐ No ☐ NA ☒

Signature:



Date:

10-30-2017

Print Name and Title: Eric Lamontagne, Supervisor