



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 1**

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

**VIA EMAIL**

September 21, 2017

David A. Maclean, PG, LSP  
GeoInsight, Inc.  
186 Granite Street, 3<sup>rd</sup> Floor Suite A  
Manchester, NH, 03101  
[damaclean@geoinc.com](mailto:damaclean@geoinc.com)

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization # MAG910749, for the Gill Mobil site located in Gill, MA

Dear Mr. Maclean:

Based on the review of a Notice of Intent (NOI) dated September 7, 2017 for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes GeoInsight, Inc., as the named operator, to discharge in accordance with the provisions of the RGP from this site via the Town of Gill storm sewer system<sup>1</sup> to an unnamed tributary to the Connecticut River (MA34-02). 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 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. For the complete general permit, see EPA's RGP website.<sup>2</sup>

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 November 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.

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<sup>1</sup> 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.

<sup>2</sup> <https://www.epa.gov/npdes-permits/remediation-general-permit-rgp-massachusetts-new-hampshire>.

In accordance with Part 2.2.4 of the RGP, your authorization to discharge also includes an additional monitor-only requirement for total cyanide. The reason for these additional monitoring requirements is because the minimum level(s) of the data submitted with your NOI, 20 µg/L, exceeds the minimum level required in Part 2.1.1 of the RGP, 5.0 µg/L. This monitoring requirement may be reduced or eliminated in the future in accordance with Part 5.1.2.a. of the RGP.

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. Where a compliance level applies, EPA has specified the compliance level and 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](mailto:little.shauna@epa.gov), if you have any questions.

Sincerely,



Thelma Murphy, Chief  
Storm Water and Construction Permits Section

Enclosure

cc: Thomas J. Frawley, Summit Distributing, LLC, via email  
Meaghan M. Broderick, PG, GeoInsight, Inc., via email  
Xiaodan Ruan, MassDEP, via email  
Town of Gill

## GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

**Table 1: Authorization Information**

<b>Permit Number</b>	MAG910749
<b>Receiving Water</b>	Unnamed tributary to the Connecticut River
<b>Outfall Number</b>	Outfall 001 to Town of Gill
<b>Monitoring Frequency</b>	See Part 4.1.2 of the RGP
<b>Reporting Requirement</b>	See Part 4.6.1 of the RGP; NetDMR not required

**Table 2: Chemical-Specific Effluent Limitations and Monitor-Only Requirements<sup>1</sup>**

<b>Parameter</b>	<b>Effluent Limitation</b>
<b>A. Inorganics</b>	
Ammonia <sup>2</sup>	Report mg/L
Chloride <sup>3</sup>	Report µg/L
Total Suspended Solids	30 mg/L
Antimony <sup>4</sup>	206 µg/L
Arsenic <sup>4</sup>	10 µg/L
Cadmium <sup>4</sup>	0.3098 µg/L
Chromium III <sup>4</sup>	323 µg/L
Chromium VI <sup>4</sup>	323 µg/L
Copper <sup>4</sup>	10.2 µg/L
Iron <sup>4</sup>	1,000 µg/L
Lead <sup>4</sup>	4.01 µg/L
Mercury <sup>4</sup>	0.739 µg/L
Nickel <sup>4</sup>	1,450 µg/L
Selenium <sup>4</sup>	5.0 µg/L
Silver <sup>4</sup>	5.2 µg/L
Zinc <sup>4</sup>	420 µg/L
Cyanide <sup>5</sup>	Report µg/L
<b>D. Non-Halogenated Semi-Volatile Organic Compounds</b>	
Total Group I Polycyclic Aromatic Hydrocarbons <sup>6</sup>	1.0 µg/L
Benzo(a)anthracene <sup>6</sup>	Report µg/L
Benzo(a)pyrene <sup>6</sup>	Report µg/L
Benzo(b)fluoranthene <sup>6</sup>	Report µg/L
Benzo(k)fluoranthene <sup>6</sup>	Report µg/L
Chrysene <sup>6</sup>	Report µg/L
Dibenzo(a,h)anthracene <sup>6</sup>	Report µg/L
Indeno(1,2,3-cd)pyrene <sup>6</sup>	Report µg/L
Total Group II Polycyclic Aromatic Hydrocarbons	100 µg/L
Naphthalene	20 µg/L

**Table 2 Notes:**

<sup>1</sup> The following abbreviations are used in Table 2, above:

<sup>a</sup> mg/L = milligrams per liter

<sup>b</sup> µg/L = micrograms per liter

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

<sup>3</sup> The ML for analysis of chloride must be less than or equal to 230 mg/L.

<sup>4</sup> The limitation for this parameter is on the basis of total recoverable metal in the water column.

<sup>5</sup> The ML for analysis of total cyanide must be less than or equal to 5.0 mg/L.

<sup>6</sup> 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**

<sup>1</sup> The following abbreviations are used in Table 3, above:

<sup>a</sup> 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**

<sup>1</sup> The following abbreviations are used in Table 4, above:

<sup>a</sup> SU = standard units