



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

**VIA EMAIL**

May 24, 2017

Adam Last, PE, LSP  
Corporate Environmental Advisors  
7 Hartwell Street, Suite 2  
West Boylston, MA 01583  
[alast@cea-inc.com](mailto:alast@cea-inc.com)

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization # MAG910703, for the Sargent Residence site located in Northborough, MA

Dear Mr. Last:

Based on the review of a Notice of Intent (NOI) dated May 8, 2017 for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Corporate Environmental Advisors (CEA), as the named operator, to discharge in accordance with the provisions of the RGP from this site via the Northborough storm drain system<sup>1</sup> to freshwater wetlands adjacent to Hop Brook (MA82B-20). 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.<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 are not expected to last twelve (12) months or more. 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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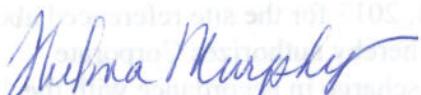
<sup>1</sup> The operator is responsible for obtaining permission to discharge to this system, prior to initiating discharges. EPA's authorization to discharge does not convey any such permission.

<sup>2</sup> <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 has provided corrections for the water quality-based effluent limitations (WQBELs) for the following total recoverable metals: arsenic, cadmium, chromium III, copper, iron, and lead. The reason for these corrections is to convert the WQBELs included for these parameters in Table 2 of the RGP expressed on the basis of dissolved metal in the water column to the form of total recoverable metal in the water column, adjust hardness-dependent metals for site-specific hardness concentrations, and to determine which WQBELs apply to the discharge. EPA also noted that the minimum level(s) for the data submitted with your NOI for group 1 polycyclic aromatic hydrocarbons (PAHs), ranging from 0.2 to 5  $\mu\text{g}/\text{L}$ , exceeds the minimum level required in Part 2.1.1 of the RGP, 0.1  $\mu\text{g}/\text{L}$ . While these parameters are already included in your authorization to discharge in accordance with Part 2.1.1 of the RGP for Activity Category I, 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 MLs for a given parameter that is less than or equal to the effluent limitation 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](mailto:little.shauna@epa.gov), if you have any questions.

Sincerely,



Thelma Murphy, Chief  
Storm Water and Construction Permits Section

**Enclosure**

cc: Maureen Sargent, via email

Phil Olsen, Corporate Environmental Advisors, via email

Cathy Vakalopoulos, MassDEP, via email

Northborough Department of Public Works, via email

## GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

**Table 1: Authorization Information**

<b>Permit Number</b>	MAG910703
<b>Receiving Water</b>	Hop Brook
<b>Outfall Number</b>	Outfall 001 to Northborough storm drain
<b>Monitoring Frequency</b>	See Part 4.1.2 of the RGP
<b>Reporting Requirement</b>	See Part 4.6.1.b 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	206 µg/L
Arsenic	10 µg/L
Cadmium	0.445 µg/L
Chromium III	149.2 µg/L
Chromium VI	323 µg/L
Copper	16.5 µg/L
Iron	1,000 µg/L
Lead	7.46 µg/L
Mercury	0.739 µg/L
Nickel	1,450 µg/L
Selenium	235.8 µg/L
Silver	35.1 µg/L
Zinc	420 µg/L
<b>B. Non-Halogenated Volatile Organic Compounds</b>	
Total BTEX	100 µg/L
Benzene	5.0 µg/L
Acetone	797 mg/L
Phenol	1,080 µg/L
<b>C. Halogenated Volatile Organic Compounds</b>	
Tetrachloroethylene	5.0 µg/L
<b>D. Non-Halogenated Semi-Volatile Organic Compounds</b>	
Total Group I Polycyclic Aromatic Hydrocarbons (PAHs) <sup>4</sup>	1.0 µg/L
Benzo(a)anthracene <sup>4</sup>	Report µg/L
Benzo(a)pyrene <sup>4</sup>	Report µg/L
Benzo(b)fluoranthene <sup>4</sup>	Report µg/L
Benzo(k)fluoranthene <sup>4</sup>	Report µg/L
Chrysene <sup>4</sup>	Report µg/L
Dibenz(a,h)anthracene <sup>4</sup>	Report µg/L
Indeno(1,2,3-cd)pyrene <sup>4</sup>	Report µg/L
Total Group II PAHs	100 µg/L

Naphthalene	20 µg/L
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**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 ML for analysis of each individual PAH must be less than or equal to 0.1 µg/L.

**Table 3: Effluent Flow Limitation**

Effluent Flow	Effluent Limitation
	0.108 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