



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 1**

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

**VIA EMAIL**

December 7, 2017

Nicholas Morel  
Suffolk Construction Company  
65 Allerton Street  
Boston, MA 02219  
[nmorel@suffolk.com](mailto:nmorel@suffolk.com)

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization #MAG910757, for the 2 Waterside Place site located in Boston, MA

Dear Mr. Morel:

Based on the review of a Notice of Intent (NOI) dated November 27, 2017 submitted by McPhail Associates, LLC for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Suffolk Construction Company, 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<sup>1</sup> 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. 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 expected to terminate in October, 2018. Because your discharges are 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> <https://www.epa.gov/npdes-permits/remediation-general-permit-rgp-massachusetts-new-hampshire>.

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 incorrect entry of the upstream and discharge flow values in the fillable electronic format submitted with the NOI. These values were corrected to zero upstream flow and the maximum discharge flow. The reason for these corrections is to determine the WQBELs that apply to the proposed discharge. Based on the revised calculations, your authorization to discharge includes a revised WQBEL for total recoverable 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 MLs 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](mailto:little.shauna@epa.gov), if you have any questions.

Sincerely,



Thelma Murphy, Chief  
Storm Water and Construction Permits Section

Enclosure

cc: Theonie Alicandro, The Drew Company, via email  
William J. Burns, LSP, McPhail Associates, LLC, via email  
Kirk W. Seaman, McPhail Associates, LLC, via email  
Cathy Vakalopoulos, MassDEP, via email  
Boston Water and Sewer Commission, via email

## GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

**Table 1: Authorization Information**

<b>Permit Number</b>	MAG910757
<b>Receiving Water</b>	Boston Inner Harbor
<b>Outfall Number</b>	Outfall 001 to City of Boston SDO 3
<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>	104 µg/L
Cadmium <sup>4</sup>	10.2 µg/L
Chromium III <sup>4</sup>	323 µg/L
Chromium VI <sup>4</sup>	323 µg/L
Copper <sup>4</sup>	3.7 µg/L
Iron <sup>4</sup>	5,000 µg/L
Lead <sup>4</sup>	160 µg/L
Mercury <sup>4</sup>	0.739 µg/L
Nickel <sup>4</sup>	1,450 µg/L
Selenium <sup>4</sup>	235.8 µg/L
Silver <sup>4</sup>	35.1 µg/L
Zinc <sup>4</sup>	420 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.

**Table 3: Effluent Flow Limitation**

<b>Effluent Flow</b>	<b>Effluent Limitation</b>
	0.072 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**

<b>Receiving Water Class</b>	<b>Effluent Limitation</b>
Saltwater	6.5 to 8.5 SU

**Table 4 Notes**

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

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