



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

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

VIA EMAIL

December 13, 2018

Scott Lutz
Northrop Grumman Guidance and Electronics Company, Inc.
101 Continental Blvd. MS: D12/XE5D21
El Segundo, CA 90245
scott.lutz@ngc.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization #MAG910818 for the Cresticon Westminster site located at 180 State Road East in Westminster, MA

Dear Mr. Lutz:

Based on the review of a Notice of Intent (NOI) received October 1, 2018 and revised November 5, 2018 submitted by Orion Environmental Inc. for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Northrop Grumman Guidance and Electronics Company, Inc., as the named operator, to discharge in accordance with the provisions of the RGP from this site to the Whitman River (MA81-11). 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 effluent limitations and monitoring requirements for your activity category VIII, dredge-related dewatering discharge. Where a given parameter does not apply to the discharge, EPA has indicated "Not Required" in the enclosed summary. A dilution factor of 3.76, approved by the Massachusetts Department of Environmental Protection, 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, currently available at: <https://www.epa.gov/npdes-permits/remediation-general-permit-rgp-massachusetts-new-hampshire>.

This EPA general permit and authorization to discharge will expire on April 8, 2022, or upon Notice of Termination (NOT), whichever occurs first. In accordance with Part 5.3 of the RGP, your permit coverage will be administratively continued upon expiration if the RGP has not been reissued. Please note that you must submit a NOT within thirty (30) days of the termination of discharges. Since you have reported your discharges are not expected to last twelve (12) months or more, EPA expects you will not be subject to NetDMR reporting requirements.

However, if EPA does not receive a NOT, NetDMR reporting requirements will begin automatically on January 1, 2020. See Part 4.6 and 5.2 and Appendix IV, Part 3 and Appendix VIII of the RGP for more information regarding reporting requirements. For additional Appendix VIII resources, including instructions for establishing a NetDMR account, see EPA's RGP website noted above.

Your authorization to discharge includes the following additional conditions: 1) A monitor-only requirement for barium; 2) A monitor-only requirement for thallium; and 3) A technology-based effluent limitation (TBEL) for total suspended solids (TSS). The additional monitoring requirements for barium and thallium are being required in accordance with Part 2.2.3.c, Part 2.2.4, and Part 2.3.3.c of the RGP because you disclosed that these contaminants are present at the site. The additional TBEL for TSS is being required in accordance with Part 2.2.2, Part 2.2.4, and Part 2.3.3.c of the RGP because although this contaminant was not detected in the influent sample provided, the influent sample did not consist of the proposed dewatering discharge, which is likely to contain solids given the disturbance of and dewatering of solids proposed. This letter provides these additional conditions in writing. Monitoring for barium, thallium and TSS shall be conducted in conjunction with the monitoring required for the other parameters applicable in Part 2.1.1 of the RGP. Any sufficiently sensitive test method in 40 CFR Part 136 may be used for analysis of barium, thallium and TSS.

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 a minimum level (ML) for analysis for a given parameter that is no greater than the effluent limitation for that parameter, unless otherwise specified 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 provided the required compliance level with the enclosed summary. See Part 4.1 of the RGP, and Appendix VII for more information regarding sufficiently sensitive test methods.

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,

A handwritten signature in blue ink that reads "Thelma Murphy". The signature is fluid and cursive, with the first name "Thelma" and last name "Murphy" clearly distinguishable.

Thelma Murphy, Chief
Stormwater and Construction Permits Section
Office of Ecosystem Protection

cc: Bob Francis, Crocker Pond Properties, Inc., via email
Steve Hash, P.E., Orion Environmental Inc., via email
Cathy Vakalopoulos, MassDEP, via email

GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

Table 1: Authorization Information

Permit Number	MAG910818
Receiving Water	Whitman River
Outfall Number	Outfall 001
Monitoring Requirements	See Table 2 through Table 6, below; See Part 4.1, 4.3 and 4.4 of the RGP; WET testing not required
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 Limitation²
A. Inorganics	
Ammonia ³	Not Required
Chloride ⁴	Report µg/L
Total Residual Chlorine ⁵	41 µg/L
Total Suspended Solids	30 mg/L
Antimony ⁶	206 µg/L
Arsenic ⁶	104 µg/L
Cadmium ⁶	0.1054 µg/L
Chromium III ⁶	Not Required
Chromium VI ⁶	Not Required
Copper ⁶	242 µg/L
Iron ⁶	5,000 µg/L
Lead ⁶	160 µg/L
Mercury ⁶	0.739 µg/L
Nickel ⁶	1,450 µg/L
Selenium ⁶	Not Required
Silver ⁶	Not Required
Zinc ⁶	420 µg/L
Cyanide ⁷	178 mg/L
B. Non-Halogenated Volatile Organic Compounds	
Total BTEX	Not Required
Benzene	Not Required
1,4 Dioxane	Not Required
Acetone	Not Required
Phenol	Not Required
C. Halogenated Volatile Organic Compounds	
Carbon Tetrachloride	Not Required

1,2 Dichlorobenzene	Not Required
1,3 Dichlorobenzene	Not Required
1,4 Dichlorobenzene	Not Required
1,1 Dichloroethane	Not Required
1,2 Dichloroethane	Not Required
1,1 Dichloroethylene	Not Required
Ethylene Dibromide	Not Required
Methylene Chloride	Not Required
1,1,1 Trichloroethane	Not Required
1,1,2 Trichloroethane	Not Required
Trichloroethylene	Not Required
Tetrachloroethylene	Not Required
cis-1,2 Dichloroethylene	Not Required
Vinyl Chloride	Not Required
D. Non-Halogenated Semi-Volatile Organic Compounds	
Total Phthalates	Not Required
Diethylhexyl Phthalate	Not Required
Total Group I Polycyclic Aromatic Hydrocarbons ⁸	Not Required
Benzo(a)anthracene ⁸	Not Required
Benzo(a)pyrene ⁸	Not Required
Benzo(b)fluoranthene ⁸	Not Required
Benzo(k)fluoranthene ⁸	Not Required
Chrysene ⁸	Not Required
Dibenzo(a,h)anthracene ⁸	Not Required
Indeno(1,2,3-cd)pyrene ⁸	Not Required
Total Group II Polycyclic Aromatic Hydrocarbons	Not Required
Naphthalene	Not Required
E. Halogenated Semi-Volatile Organic Compounds	
Total Polychlorinated Biphenyls ⁹	Not Required
Pentachlorophenol	Not Required
F. Fuels Parameters	
Total Petroleum Hydrocarbons	Not Required
Ethanol	Not Required
Methyl-tert-Butyl Ether	Not Required
tert-Butyl Alcohol	Not Required
tert-Amyl Methyl Ether	Not Required

Table 2 Notes:

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

^a mg/L = milligrams per liter

^b µg/L = micrograms per liter

² The limitation type for all parameters is monthly average.

³ The minimum level (ML) for analysis of ammonia must be less than or equal to 0.1 mg/L.

⁴ The ML for analysis of chloride must be less than or equal to 230 mg/L.

⁵ The ML for analysis of total residual chlorine (TRC) must be less than or equal to 50 µg/L. The compliance level for TRC is 50 µg/L.

⁶ The limitation for this parameter is on the basis of total recoverable metal in the water column.

⁷ Total cyanide must be reported. The ML for analysis of total cyanide must be less than or equal to 5.0 µg/L.

⁸ The ML for analysis of group I polycyclic aromatic hydrocarbons (PAHs) must be less than or equal to 0.1 µg/L.

⁹ The ML for analysis of total polychlorinated biphenyls (PCBs) must be less than or equal to 0.5 µg/L.

Table 3: Effluent Flow Limitation¹

Effluent Flow	Effluent Limitation ²
	0.216 MGD

Table 3 Notes

¹ The following abbreviations are used in Table 3, above:

^a MGD = million gallons per day

² The limitation type for effluent flow is daily maximum.

Table 4: pH Limitations¹

Receiving Water Class	Effluent Limitation ²
Freshwater	6.5 to 8.3 SU

Table 4 Notes

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

^a SU = standard units

² The limitation type for pH is range.

Table 5: Temperature Limitations¹

Receiving Water Class		Effluent Limitation ²	ΔT Limitation ³
Class B	---	Not Required	Not Required

Table 5 Notes

¹ The following abbreviations are used in Table 5, above:

^a °F = degrees Fahrenheit

^b ΔT = change in temperature

^c \leq = less than or equal to

² The limitation type for temperature is daily maximum.

³ Change in temperature from background shall be determined by subtracting the temperature of the effluent from the temperature of the receiving water measured at a point immediately upstream of a discharge's zone of influence at a reasonably accessible location

Table 6: Additional Requirements¹

Parameter ²	Effluent Limitation ³
Barium, Thallium	Report $\mu\text{g/L}$

Table 6 Notes

¹ The following abbreviations are used in Table 6, above:

^a $\mu\text{g/L}$ = micrograms per liter

² Total recoverable barium and total recoverable thallium must be analyzed.

³ Minimum levels required: 1,000 $\mu\text{g/L}$ for barium, 0.47 $\mu\text{g/L}$ for thallium.