



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

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

VIA EMAIL

November 15, 2018

Scott VanderSea, LSP, LEP
Corporate Environmental Advisors
21 East Main Street, Suite 201
Westborough, MA 01581
svandersea@cea-inc.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization #MAG910817 for the Former Fuel Oil Bulk Storage Facility site located at 7 Clapp Street in Worcester, MA

Dear Mr. VanderSea:

Based on the review of a Notice of Intent (NOI) received October 1, 2018 for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Corporate Environmental Advisors, as the named operator, to discharge in accordance with the provisions of the RGP from this site via the City of Worcester storm sewer system to the Blackstone River (MA51-03). Please note that 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.]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 I, petroleum-related site remediation discharge. Where a given parameter does not apply to the discharge, EPA has indicated "Not Required" in the enclosed summary. A dilution factor of 14.19, 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 expected to last twelve (12) months

or more (i.e., through December 2019), EPA expects you will be subject to NetDMR reporting requirements, which will begin automatically on December 1, 2019. 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.

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,

TODD BORCI	Digitally signed by TODD BORCI Date: 2018.11.15 08:27:20 -05'00'
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Todd Borci, Acting Chief
Stormwater and Construction Permits Section
Office of Ecosystem Protection

cc: Howard Peterson, Jr., Peterson Oil Service, Inc., via email
Adam Guaraldi, Corporate Environmental Advisors, via email
Cathy Vakalopoulos, MassDEP, via email
Worcester Department of Public Works, via email

GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

Table 1: Authorization Information

Permit Number	MAG910817
Receiving Water	Blackstone River
Outfall Number	Outfall 001 to City of Worcester
Monitoring Requirements	See Table 2 through Table 6, below; See Part 4.1, and 4.3 of the RGP; WET testing required
Reporting Requirement	See Part 4.6.1 of the RGP; NetDMR reporting will begin Dec 1, 2019 unless NOT received by EPA

Table 2: Chemical-Specific Effluent Limitations and Monitor-Only Requirements¹

Parameter	Effluent Limitation²
A. Inorganics	
Ammonia ³	Report mg/L
Chloride ⁴	Report µg/L
Total Residual Chlorine ⁵	156 µg/L
Total Suspended Solids	30 mg/L
Antimony ⁶	206 µg/L
Arsenic ⁶	104 µg/L
Cadmium ⁶	0.3822 µg/L
Chromium III ⁶	323 µg/L
Chromium VI ⁶	323 µg/L
Copper ⁶	242 µg/L
Iron ⁶	1,000 µg/L
Lead ⁶	160 µg/L
Mercury ⁶	0.739 µg/L
Nickel ⁶	1,450 µg/L
Selenium ⁶	235.8 µg/L
Silver ⁶	35.1 µg/L
Zinc ⁶	420 µg/L
Cyanide ⁷	Not Required
B. Non-Halogenated Volatile Organic Compounds	
Total BTEX	100 µg/L
Benzene	5.0 µg/L
1,4 Dioxane	Not Required
Acetone	7.97 mg/L
Phenol	1,080 µg/L
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 1 Polycyclic Aromatic Hydrocarbons ⁸	1.0 µg/L
Benzo(a)anthracene ⁸	0.0539 µg/L
Benzo(a)pyrene ⁸	0.0539 µg/L
Benzo(b)fluoranthene ⁸	0.0539 µg/L
Benzo(k)fluoranthene ⁸	0.0539 µg/L
Chrysene ⁸	0.0539 µg/L
Dibenzo(a,h)anthracene ⁸	0.0539 µg/L
Indeno(1,2,3-cd)pyrene ⁸	0.0539 µg/L
Total Group II Polycyclic Aromatic Hydrocarbons	100 µg/L
Naphthalene	20 µg/L
E. Halogenated Semi-Volatile Organic Compounds	
Total Polychlorinated Biphenyls ⁹	Not Required
Pentachlorophenol	Not Required
F. Fuels Parameters	
Total Petroleum Hydrocarbons	5.0 mg/L
Ethanol	Not Required
Methyl-tert-Butyl Ether	Not Required
tert-Butyl Alcohol	120 µg/L
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.

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. The compliance level for group I PAHs is 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
	0.144 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
Acute Whole Effluent Toxicity	Report %

Table 6 Notes

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

^a % = percent (LC50)

² See Part 4.1.6 of the RGP.

³