



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

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

VIA EMAIL

December 12, 2018

David Ehrhardt
The Rivers School
333 Winter Street
Weston, MA 02493
david@dariodesigns.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization #MAG910824 for The Rivers School site located at 333 Winter Street in Weston, MA

Dear Mr. Ehrhardt:

Based on the review of a Notice of Intent (NOI) received October 29, 2018 and revised October 30, 2018 submitted by Environment & Energy Solutions, Inc. for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes The Rivers School, as the named operator, to discharge in accordance with the provisions of the RGP from this site to the Nonesuch Pond (MA72085). 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 III, contaminated site 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 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, 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 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.

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 influent and receiving water hardness concentrations in the fillable electronic format submitted with the NOI. These values were corrected to the influent and receiving water hardness concentrations reported in the NOI. The reason for this correction is to determine the WQBELs that apply to the proposed discharge. Based on the revised calculations, your authorization to discharge includes revised WQBELs for total recoverable lead of 3.05 µg/L, and total recoverable silver of 3.9 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 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: Joseph F. Dorsett, Jr., Environment & Energy Solutions, Inc., via email
Cathy Vakalopoulos, MassDEP, via email

GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES

Table 1: Authorization Information

Permit Number	MAG910824
Receiving Water	Nonesuch Pond
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 reporting will begin Jan 1, 2020 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	Not Required
Total Suspended Solids	30 mg/L
Antimony ⁶	206 µg/L
Arsenic ⁶	10 µg/L
Cadmium ⁶	10.2 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	3.05 µg/L
Mercury ⁶	0.739 µg/L
Nickel ⁶	1,450 µg/L
Selenium ⁶	235.8 µg/L
Silver ⁶	3.9 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	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	1.0 µg/L
Benzo(a)anthracene ⁸	Report µg/L
Benzo(a)pyrene ⁸	Report µg/L
Benzo(b)fluoranthene ⁸	Report µg/L
Benzo(k)fluoranthene ⁸	Report µg/L
Chrysene ⁸	Report µg/L
Dibenzo(a,h)anthracene ⁸	Report µg/L
Indeno(1,2,3-cd)pyrene ⁸	Report 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	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.

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
	0.72 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
None Required	NA

Table 6 Notes

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

^a NA = not applicable

² NA

³ NA