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

VIA EMAIL

June 24, 2020

Neil Johnson
James T. Lynch Construction Company
77 Lowell Junction Road
Andover, MA 01810
neil@jtlynchconstruction.net

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization #MAG910919 for the Chelsea Phase II site located at 250 Vale Street in Chelsea, MA

Neil Johnson:

Based on the review of a Notice of Intent (NOI) dated April 3, 2020 submitted by The Vertex Companies, Inc. for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes James T. Lynch Construction Company, as the named operator, to discharge in accordance with the provisions of the RGP from this site via the City of Chelsea storm sewer system to the Mystic River (MA71-03). 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. The RGP and this authorization to discharge will expire on April 8, 2022, or upon Notice of Termination, 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.

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. No dilution factor 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.

A Best Management Practices Plan (BMPP) and Best Management Practices (BMPs) are required for all operators. This includes corrective actions required upon discovery of a violation of a permit limitation or requirement. See Part 2.5.1 and 2.5.2 of the RGP for more information.

In accordance with Part 2.5.3 of the RGP, no discharges chemical(s) and/or additive(s) are authorized. To discharge any chemical(s) and/or additive(s), a Notice of Change is required. See Part 5.1 and Appendix IV, Part 2 of the RGP for more information. Your authorization to discharge includes the following additional water quality-based limitations: 1) benzo(a)anthracene; benzo(a)pyrene; benzo(b)fluoranthene; benzo(k)fluoranthene; chrysene; dibenzo(a,h)anthracene; indeno(1,2,3-cd)pyrene. These limitations are being required in accordance with Part 1.3.5 of the RGP, because the receiving water is impaired for petroleum hydrocarbons and you disclosed that total Group I PAHs are present at the site.

Monitoring requirements begin upon initiation of discharge. 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, 4.3, and 4.4 of the RGP for more information regarding monitoring requirements. Also see Appendix VII for more information regarding sufficiently sensitive test methods.

You must submit a Notice of Termination (NOT) within thirty (30) days of the termination of discharges, which must include an electronic attachment in accordance with Appendix VIII of all monitoring data collected. Since you have reported your discharges are expected to last twelve (12) months or more, EPA expects you will be subject to NetDMR reporting requirements. You must begin submitting monitoring data using NetDMR for the monitoring period beginning on July 1, 2021. See Parts 4.6, 5.1, 5.2 and 6, Appendix IV, 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.

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: 2020.06.24 16:14:39 -04'00'

Todd Borci, Acting Chief
Stormwater and Construction Permits Section
Water Division

Enclosure

cc: Matthew Lynn, Fairfield Chelsea Phase II, LLC, via email
Patrice A. Plante, The Vertex Companies, Inc., via email
Chelsea Hatch, EIT, The Vertex Companies, Inc., via email
Sean E. Dinneen, The Vertex Companies, Inc., via email
Cathy Vakalopoulos, MassDEP, via email
City of Chelsea Public Works, via email

Table 1: Authorization Information

Permit Number	MAG910919
Receiving Water	Mystic River
Outfall Number(s)	Outfall 001 to City of Chelsea
Monitoring Requirements	See Table 2 through Table 6, below; See Parts 4.1, 4.3 and 4.4 of the RGP; WET testing not required
Reporting Requirements	See Parts 4.6, 5.1, 5.2 and 6 of the RGP; NetDMR reporting will begin July 1, 2021 unless NOT received by EPA

Table 2: Chemical-Specific Effluent Limitations and Monitor-Only Requirements[1]

Parameter[2]	Effluent Limitation[3]
A. Inorganics	
Ammonia[4]	Report mg/L
Chloride[5]	Report µg/L
Total Residual Chlorine[6]	Not Required
Total Suspended Solids	30 mg/L
Antimony[7]	206 µg/L
Arsenic[7]	104 µg/L
Cadmium[7]	10.2 µg/L
Chromium III[7]	323 µg/L
Chromium VI[7]	323 µg/L
Copper[7]	3.7 µg/L
Iron[7]	5,000 µg/L
Lead[7]	8.5 µg/L
Mercury[7]	0.739 µg/L
Nickel[7]	8.3 µg/L
Selenium[7]	235.8 µg/L
Silver[7]	35.1 µg/L
Zinc[7]	86 µg/L
Cyanide[8]	1.0 µg/L
B. Non-Halogenated Volatile Organic Compounds	
Total BTEX[9]	Not Required
Benzene	Not Required
1,4 Dioxane	Not Required
Acetone	7.97 mg/L
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[10]	Not Required
Diethylhexyl Phthalate	Not Required
Total Group I Polycyclic Aromatic Hydrocarbons[11]	1.0 µg/L
Benzo(a)anthracene[11]	0.0038 µg/L
Benzo(a)pyrene[11]	0.0038 µg/L
Benzo(b)fluoranthene[11]	0.0038 µg/L
Benzo(k)fluoranthene[11]	0.0038 µg/L
Chrysene[11]	0.0038 µg/L
Dibenzo(a,h)anthracene[11]	0.0038 µg/L
Indeno(1,2,3-cd)pyrene[11]	0.0038 µg/L
Total Group II Polycyclic Aromatic Hydrocarbons[12]	100 µg/L
Naphthalene	20 µg/L
E. Halogenated Semi-Volatile Organic Compounds	
Total Polychlorinated Biphenyls[13]	Not Required
Pentachlorophenol	Not Required
F. Fuels Parameters	
Total Petroleum Hydrocarbons	Not Required
Ethanol[14]	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 sample type required for all parameters is grab. Grab samples must be analyzed individually and cannot be composited.

3: The effluent limitation and/or monitor-only requirement for any parameter applies, unless "Not Required" is shown. The limitation type for all parameters is monthly average.

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

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

6: The ML for analysis of total residual chlorine (TRC) must be less than or equal to 50 µg/L.

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

8: The ML for analysis of total cyanide must be less than or equal to 5.0 µg/L. The compliance level for total cyanide is 5.0 µg/L.

9: Total BTEX is the sum of: benzene; toluene; ethylbenzene; and (m,p,o) xylenes.

10: Total Phthalates is the sum of: diethylhexyl phthalate; butyl benzyl phthalate; di-n-butyl phthalate; diethyl phthalate; dimethyl phthalate; and di-n-octyl phthalate.

11: Total Group I PAHs is the sum of: benzo(a)anthracene; benzo(a)pyrene; benzo(b)fluoranthene; benzo(k)fluoranthene; chrysene; dibenzo(a,h)anthracene; indeno(1,2,3-cd)pyrene. ML for analysis of group I polycyclic aromatic hydrocarbons (PAHs) must be less than or equal to 0.1 µg/L using a test method in 40 CFR §136 with selected ion monitoring. MassDEP (e.g., EPH) and RCRA (e.g., 8260) methods cannot be used for analysis. The compliance level for group I PAHs is 0.1 µg/L.

12: Total Group II PAHs is the sum of: acenaphthene; acenaphthylene; anthracene (CAS No. 120-12-7); benzo(g,h,i)perylene; fluoranthene; fluorene; naphthalene; phenanthrene; pyrene. MassDEP (e.g., EPH) and RCRA (e.g., 8270) methods cannot be used for analysis.

13: Total PCBs is the sum of the following aroclors: PCB-1016, PCB-1221, PCB-1232, PCB-1242, PCB-1248, PCB-1254, and PCB-1260. The ML for analysis of total polychlorinated biphenyls (PCBs) must be less than or equal to 0.5 µg/L.

Table 3: Effluent Flow Limitation[1]

Effluent Flow	**Effluent Limitation**
	0.072 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 Limitations[1]

Receiving Water Class	**Effluent Limitation[2]**
Saltwater	6.5 to 8.5 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. The sample type required for pH is grab.

Table 5: Temperature Limitations[1]

Receiving Water Class		Effluent Limitation[2]	ΔT Limitation
Saltwater	Class SB	Not Required	Not Required

Table 5 Notes

1: The following abbreviations are used in Table 5, above:
- a: ^{o}F = degrees Fahrenheit
- b: ΔT = change in temperature
- c: ≤ = less than or equal to

2: The limitation type for temperature is daily maximum. The ample type required for temperature is grab.

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 Requirements

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