MAG910111
GP

Notice of Intent

Remediation General Permit
Parkway Heights

Chelsea Street and Crescent Street
Everett, Massachusetts 02149
NPDES Exclusion #MA-041-102

Prepared by:
GeoHydroCycle, Inc.

Prepared for:
BGH Development, LLC

October 7, 2005

GeoHydroCycle, Inc.

Hazardous Waste
Water Supply

Assessment
Remediation
Analyses
Permitting
Modeling
Software

October 7, 2005

US Environmental Protection Agency
RGP-NOC Processing
Municipal Assistance Unit (CMU),
1 Congress Street, Suite 1100
Boston, MA 02114-2023

re: NPDES Exclusion #MA-04I-102
Parkway Heights
203 Chelsea Street and 13-15 Crescent Street
Everett, MA
GHC #04051.1

Dear Department Staff Member:

On behalf of our Client, BGH Development, LLC (BGH), GeoHydroCycle, Inc. (GHC) is pleased to submit to you the attached Notice of Intent form for the Remediation General Permit for the NPDES Exclusion #MA-04I-102 at Chelsea and Crescent Streets in Everett, MA.

If you have any questions, please call our office.

Sincerely,
GeoHydroCycle, Inc.

Laurie Boehl

cc: Richard Broglino - BGH Development, LLC

Appendix Table of Contents.lwp

151B California Street
Newton, Massachusetts
02458

(617) 527-8074 (v)
(617) 527-8668 (f)

Table of Contents

Appendix A - Remediation General Permit, Notice of Intent Form

B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit

1. General site information. Please provide the following information about the site:

a) Name of **facility/site:** PARKWAY HEIGHTS		**Facility/site** address:		
Location of **facility/site:** longitude: 71°02'53" latitude: 42°24'12"	Facility SIC code(s):	Street: 203 CHELSEA STREET AND 13-15 CRESCENT STREET		
b) Name of **facility/site owner:** BGH DEVELOPMENT, LLC		Town: EVERETT		
Email address of owner: NONE		State: MA	Zip: 02149	County: MIDDLESEX
Telephone no.of facility/site **owner:** 781-270-0012				
Fax no. of facility/site **owner:** 781-275-5033		**Owner** is (check one): 1. Federal___ 2. State/Tribal___ 3. Private ✓ 4. other, if so, describe:		
Address of **owner** (if different from site): RICHARD BROGLINO				
Street: 8 MINUTEMAN DRIVE				
Town: BEDFORD	State: MA	Zip: 01730	County: MIDDLESEX	
c) Legal name of **operator:** GEOHYDROCYCLE, INC.	**Operator** telephone no: 617-527-8074			
	Operator fax no.: 617-527-8668	**Operator** email: swsmith@geohydrocycle.com		
Operator contact name and title: STEPHEN SMITH, P.E., P.HGW, L.S.P.				
Address of **operator** (if different from owner):	Street: 151B CALIFORNIA STREET			
Town: NEWTON	State: MA	Zip: 02458	County: MIDDLESEX	

d) Check "yes" or "no" for the following:
1. Has a prior NPDES permit exclusion been granted for the discharge? Yes ✓ No___, if "yes," number:
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Yes___ No ✓ if "yes," date and tracking #:
3. Is the discharge a "new discharge"as defined by 40 CFR 122.2? Yes No ✓
4. For sites in Massachusetts, is the discharge covered under the MA Contingency Plan (MCP) and exempt from state permitting? Yes ✓ No___

e) Is site/facility subject to any State permitting or other action which is causing the generation of discharge? Yes___ No✓ If "yes," please list: 1. site identification # assigned by the state of NH or MA: 2. permit or license # assigned: 3. state agency contact information: name, location, and telephone number:	f) Is the site/facility covered by any other EPA permit, including: 1. multi-sector storm water general permit? Y___ N✓, if Y, number: 2. phase I or II construction storm water general permit? Y___ N✓, if Y, number: 3. individual NPDES permit? Y___ N✓, if Y, number: 4. any other water quality related permit? Y___ N✓, if Y, number:

2. Discharge information. Please provide information about the discharge, (attaching additional sheets as needed) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage: SEE APPENDIX B.

b) Provide the following information about each discharge:	1) Number of discharge points: 1	2) What is the **maximum** and **average flow rate** of discharge (in cubic feet per second, ft3/s)? Max. flow NA Average flow 0.011141 Is maximum flow a **design value**? Y___ N✓ For average flow, include the units and appropriate notation if this value is a design value or estimate if not available. ESTIMATE OF 5 GPM = 0.011141 ft3/sec

3) Latitude and longitude of each discharge within 100 feet: pt.1:long. 71°02'54.92" lat. 42°24'11.53"; pt.2: long.____ lat.____; pt.3: long.____ lat.____; pt.4:long.____ lat.____; pt.5: long.____ lat.____; pt.6:long.____ lat.____; pt.7: long.____ lat.____; pt.8:long.____ lat.____; etc.

4) If hydrostatic testing, total volume of the discharge (gals): NA	5) Is the discharge intermittent YES or seasonal NO ? Is discharge ongoing Yes ✓ No____?

c) Expected dates of discharge (mm/dd/yy): start 11/29/04 end 10/31/05

d) Please attach a line drawing or flow schematic showing water flow through the facility including: SEE APPENDIX C.
1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for **all** of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within.

Gasoline Only	VOC Only	Primarily Metals	Urban Fill Sites ✓	Contaminated Sumps	Mixed Contaminants	Aquifer Testing
Fuel Oils (and Other Oils) only	VOC with Other Contaminants	Petroleum with Other Contaminants	Listed Contaminated Sites	Contaminated Dredge Condensates	Hydrostatic Testing of Pipelines/Tanks	Well Development or Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 min-imum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids		✓	1	grab	E160.2	4.00 mg/L			ND	ND
2. Total Residual Chlorine	✓									
3. Total Petroleum Hydrocarbons		✓	1	grab	TPH BX 8100m	0.2 mg/L			ND	ND
4. Cyanide	✓									
5. Benzene	✓									
6. Toluene	✓									
7. Ethylbenzene	✓									
8. (m,p,o) Xylenes	✓									
9. Total BTEX[4]	✓									

[4]BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 min-imum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
10. Ethylene Dibromide [5] (1,2- Dibromo-methane)	✓									
11. Methyl-tert-Butyl Ether (MtBE)		✓	1	grab	VOC by E.624	5.0 ug/L			ND	ND
12. tert-Butyl Alcohol (TBA)	✓									
13. tert-Amyl Methyl Ether (TAME)	✓									
14. Naphthalene	✓									
15. Carbon Tetra-chloride	✓									
16. 1,4 Dichlorobenzene	✓									
17. 1,2 Dichlorobenzene	✓									
18. 1,3 Dichlorobenzene	✓									
19. 1,1 Dichloroethane	✓									
20. 1,2 Dichloroethane	✓									
21. 1,1 Dichloroethylene	✓									
22. cis-1,2 Dichloro-ethylene	✓									
23. Dichloromethane (Methylene Chloride)	✓									
24. Tetrachloroethylene	✓									

[5] EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 min-imum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily Value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
25. 1,1,1 Trichloroethane	✓									
26. 1,1,2 Trichloroethane	✓									
27. Trichloroethylene	✓									
28. Vinyl Chloride	✓									
29. Acetone	✓									
30. 1,4 Dioxane	✓									
31. Total Phenols	✓									
32. Pentachlorophenol	✓									
33. Total Phthalates [6] (Phthalate esthers)	✓									
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	✓									
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		✓	1	grab	SW8270C					
a. Benzo(a) Anthracene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
b. Benzo(a) Pyrene		✓	1	grab	SW8270C	0.2 ug/L			ND	ND
c. Benzo(b)Fluoranthene		✓	1	grab	SW8270C	1.0 ug/L			ND	ND
d. Benzo(k) Fluoranthene		✓	1	grab	SW8270C	1.0 ug/L			ND	ND
e. Chrysene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND

[6]The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 min-imum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
f. Dibenzo(a,h) anthracene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
g. Indeno(1,2,3-cd) Pyrene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		✓	1	grab						
h. Acenaphthene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
i. Acenaphthylene		✓	1	grab	SW8270C	0.25 ug/L			ND	ND
j. Anthracene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
k. Benzo(ghi) Perylene		✓	1	grab	SW8270C	1.0 ug/L			ND	ND
l. Fluoranthene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
m. Fluorene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
n. Naphthalene-		✓	1	grab	SW8270C	0.75 ug/L			ND	ND
o. Phenanthrene		✓	1	grab	SW8270C	0.5 ug/L			ND	ND
p. Pyrene		✓	1	grab	SW8270C	1.25 ug/L			ND	ND
37. Total Polychlorinated Biphenyls (PCBs)	✓									
38. Antimony	✓									
39. Arsenic	✓									
40. Cadmium	✓									
41. Chromium III	✓									
42. Chromium VI	✓									

PARAMETER	Believe Absent	Believe Present	# of Samples (1 min-imum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
43. Copper	✓									
44. Lead	✓									
45. Mercury	✓									
46. Nickel	✓									
47. Selenium	✓									
48. Silver	✓									
49. Zinc	✓									
50. Iron	✓									
Other (describe):	✓									

c) For discharges where **metals** are believed present, please fill out the following:

Step 1: Do any of the metals in the influent have a **reasonable potential** to exceed the effluent limits in Appendix III (i.e., the limits set at zero to five dilutions)? Y____ N____	If yes, which metals?
Step 2: For any metals which have **reasonable potential** to exceed the **Appendix III** limits, calculate the **dilution factor (DF)** using the formula in Part I.A.3.c) (step 2) of the NOI instructions or as determined by the State prior to the submission of this NOI. What is the dilution factor for applicable metals? Metals:_____ DF: _____	Look up the limit calculated at the corresponding dilution factor in **Appendix IV.** Do any of the metals in the **influent** have the potential to exceed the corresponding **effluent** limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? Y____ N____ If "Yes," list which metals:

4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system:						
b) Identify each applicable treatment unit (check all that apply):	Frac. tank ✓	Air stripper	Oil/water separator	Equalization tanks	Bag filter	GAC filter
	Chlorination	Dechlorination	Other (please describe):			
c) Proposed **average** and **maximum flow rates** (gallons per minute) for the discharge and the **design flow rate**(s) (gallons per minute) of the treatment system: Average flow rate of discharge 5 GPM Maximum flow rate of treatment system NA Design flow rate of treatment system NA						
d) A description of chemical additives being used or planned to be used (attach MSDS sheets): NONE						

5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary:

a) Identify the discharge pathway:	Direct____	Within facility__	Storm drain ✓	River/brook____	Wetlands____	Other (describe):
b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: SEE APPENDIX B. CATCH BASIN DISCHARGES TO MWRA LINES, GHC WROTE A LETTER TO THE MWRA, REQUESTING DISCHARGE INFO. SEE APPENDIX D.						
c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water: SEE APPENDIX C. 1. For multiple discharges, number the discharges sequentially. 2. For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.						
d) Provide the state water quality classification of the receiving water AWAITING REPLY FROM MWRA, TO DETERMINE RECEIVING WATERS. SEE APPENDIX E.						
e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water RECEIVING WATER UNKNOWN cfs Please attach any calculation sheets used to support stream flow and dilution calculations. SEE APPENDIX E.						
f) Is the receiving water a listed 303(d) water quality impaired or limited water? Yes____ No____ If yes, for which pollutant(s)? RECEIVING WATER UNKNOWN, AWAITING REPLY FROM MWRA. Is there a TMDL? Yes No____ If yes, for which pollutant(s)? SEE APPENDIX E.						

6. Results of Consultation with Federal Services: Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII.

a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes____ No____ SEE APPENDIX B AND E.
Has any consultation with the federal services been completed ? No✓ or is consultation underway? Yes No✓
What were the results of the consultation with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service (~~check~~ one):
a "no jeopardy" opinion? _____or written concurrence____ on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?

b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge? SEE APPENDIX F
Yes_____ No✓ Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes_____ No✓

7. Supplemental information. : SEE APPENDIX G

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.

8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility/Site Name: PARKWAY HEIGHTS

Operator signature: Laurie Roehl

Title:

Date: 10/7/05

Appendix B - Discharge Activities and Discharge Pathway

Description of Discharge Activities and Pathway:

Background:

Parkway Heights will be a multistory building that will occupy 20,000 square foot of land between Chelsea and Crescent Streets in Everett, MA (the Site), see Figure 1 in Appendix B. This NPDES Permit Exclusion was obtained to cover dewatering over an estimated 18 month construction time frame.

Foundation excavation began on the Site at the end of November 2004 and was completed in April 2005. Construction excavation has resulted in the removal and transport of approximately 22,200 tons of urban fill and clay material. The foundation for the building is currently being built.

During construction activities, two pumps have been actively used for dewatering. One pump (designated as PUMP 1) is located in the southern area of the Site, see Figure 2. A ten inch perforated pipe was placed at and elevation of approximately zero feet MSL and backfilled with crushed stone. Another pump (designated as PUMP 2) was placed on the northern portion of the Site at an elevation of approximately zero feet MSL, see Figure 2. There is a 2-inch PVC pipe that connects the discharge from PUMP 2 to the discharge from PUMP 1. The combined flow is then pumped to the 20,000 gallon tank placed near the southwestern corner of the Site and discharged to a catch basin on Crescent Street that is near the property line, see Figure 2. See Figure 3 for a schematic of the discharge system.

Discharge Pathway:

GHC is currently in the process of determining the discharge path from the Crescent Street catch basin to the receiving waters. On October 4, 2005, GHC personnel visited the City of Everett, Engineering Department in order to identify the discharge pathway. It was determined by Mr. Peter E. Messina, a City of Everett Engineer, that the catch basin on Crescent Street discharges to drainage lines on Ferry Street, which then discharge to MWRA lines on Revere Beach Parkway in Everett. In response to this determination, GHC wrote a letter to the MWRA Engineering Department requesting information on the path that this Revere Beach Parkway line takes to its receiving waters, refer to Appendix C for a copy of that letter.

See Figure 4 for a detailed map showing the location of the discharge on Crescent Street to the indirect conveyance of the MWRA line on Revere Beach Parkway, as well as nearby sensitive receptors (surface waters, drinking water supplies, wetland areas, and areas of critical environmental concern).

City sewerage is provided in the area of Crescent Street in Everett. Based on conversations with Mr. Messina and the observation of city sewer maps, sewer lines run beneath Crescent Street, therefore the closest sanitary sewer is located beneath Crescent Street.

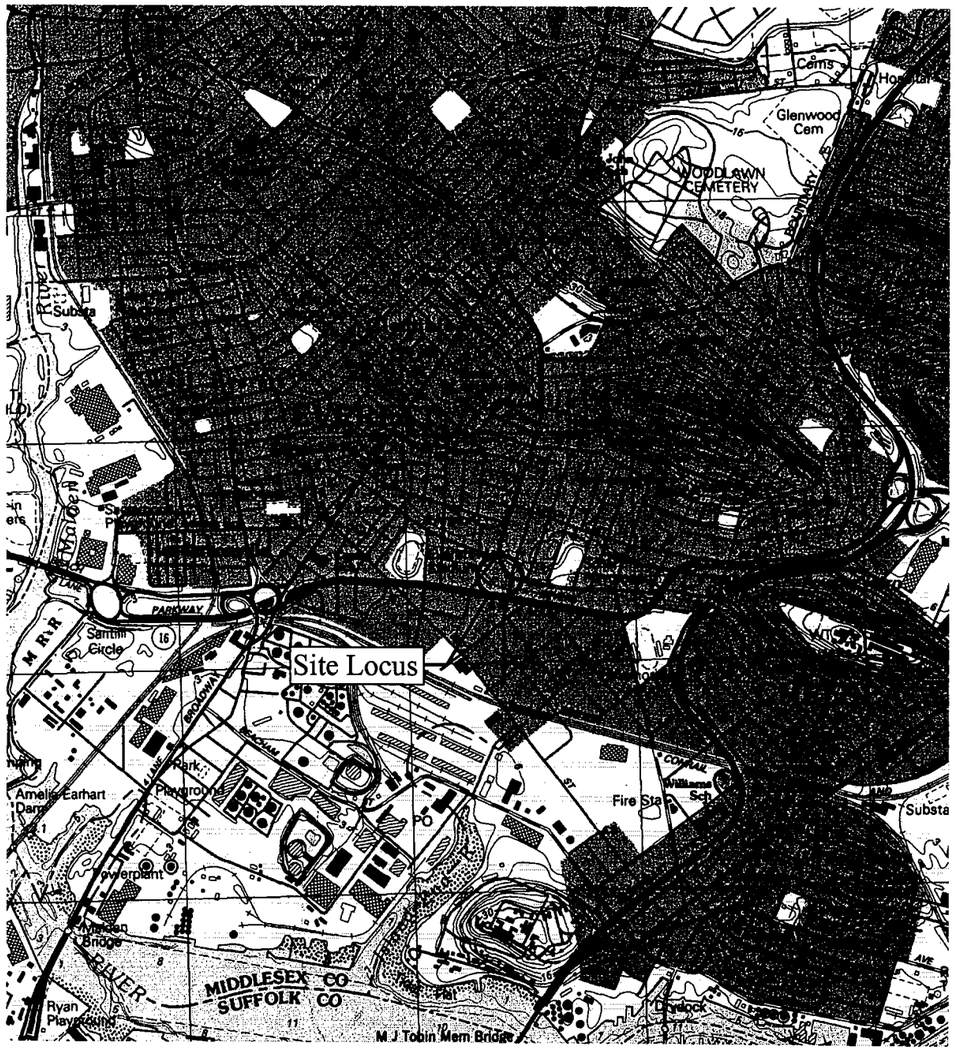
Sampling and Analysis:

The following paragraphs describe the sampling and analyses of influent and effluent samples. All samples were placed in appropriate sample containers supplied by the laboratory and placed on ice in an insulated container and sent under chain-of-custody protocol to GeoLabs, Inc., in Braintree, MA. Samples were analyzed in the laboratory for Total Suspended Solids

(TSS), Total Petroleum Hydrocarbons (TPH), Polynuclear Aromatic Hydrocarbons (PAH), and Methyl-tert-Butyl Ether (MtBE) in accordance with Attachment A of the Permit Exclusion. In accordance with the NPDES Exclusion Permit, sampling and reporting has been on a monthly basis. Table 1 in Appendix E summarizes the results of the water testing for the most recent sampling taken from the influent and effluent water sampling from the month of September, and compares the results with the EPA NPDES Limits. As the results indicate, no constituents exceeded the Permit Limits for this sampling round.

Appendix C - Figures

04051.1 Fl.srf



0 2,083
Scale in Feet

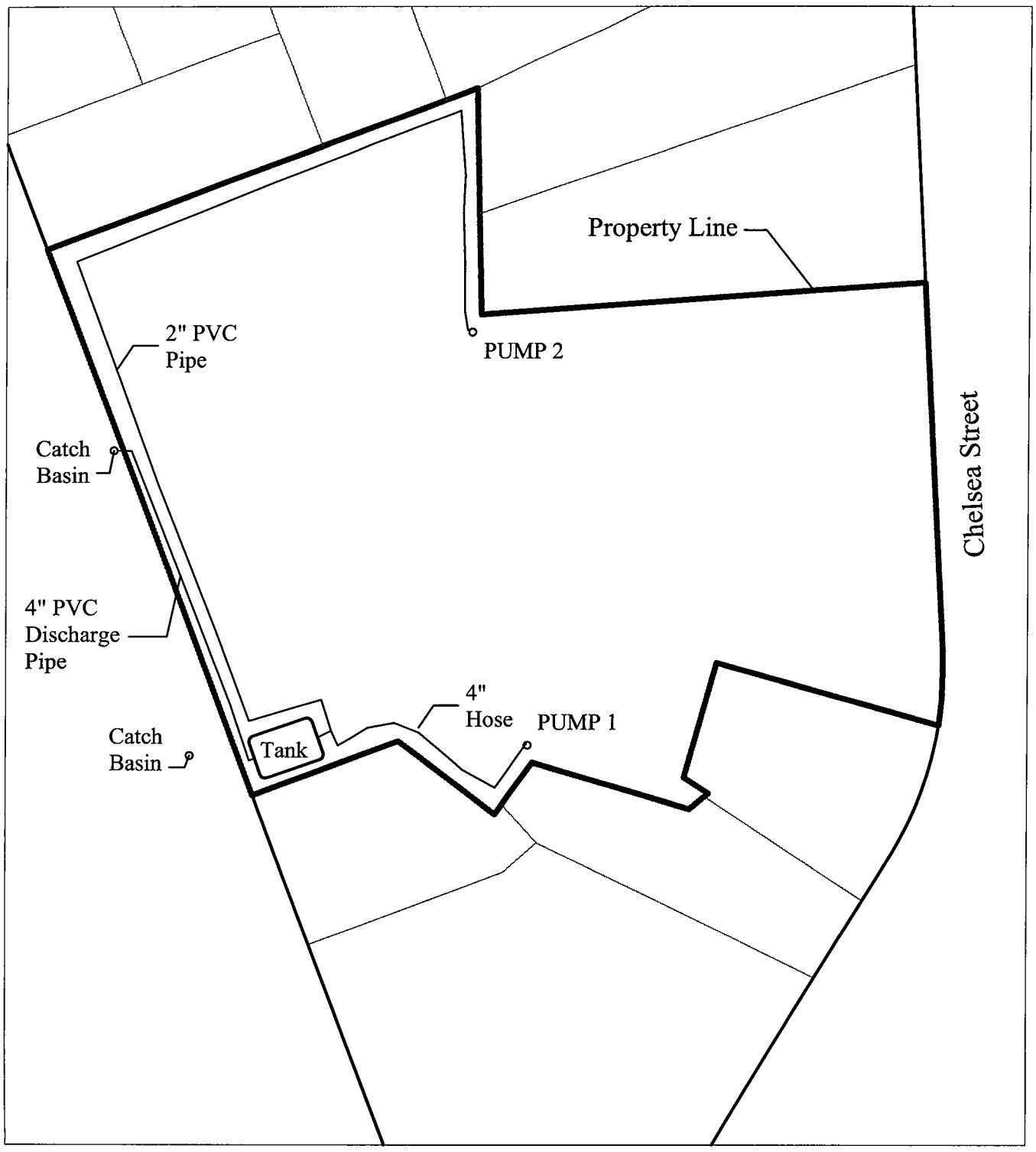
Base Map: Mass GIS Scanned USGS Quadrangles.

GeoHydroCycle, Inc.

Figure 1. Site Locus.

Project No.	GHC # 04051.1		
Drafted:	SWS	Checked:	TWM
Date:	10/22/04	Revision:	

NPDES Permit
Parkway Heights
Chelsea and Crescent Streets
Everett, Massachusetts



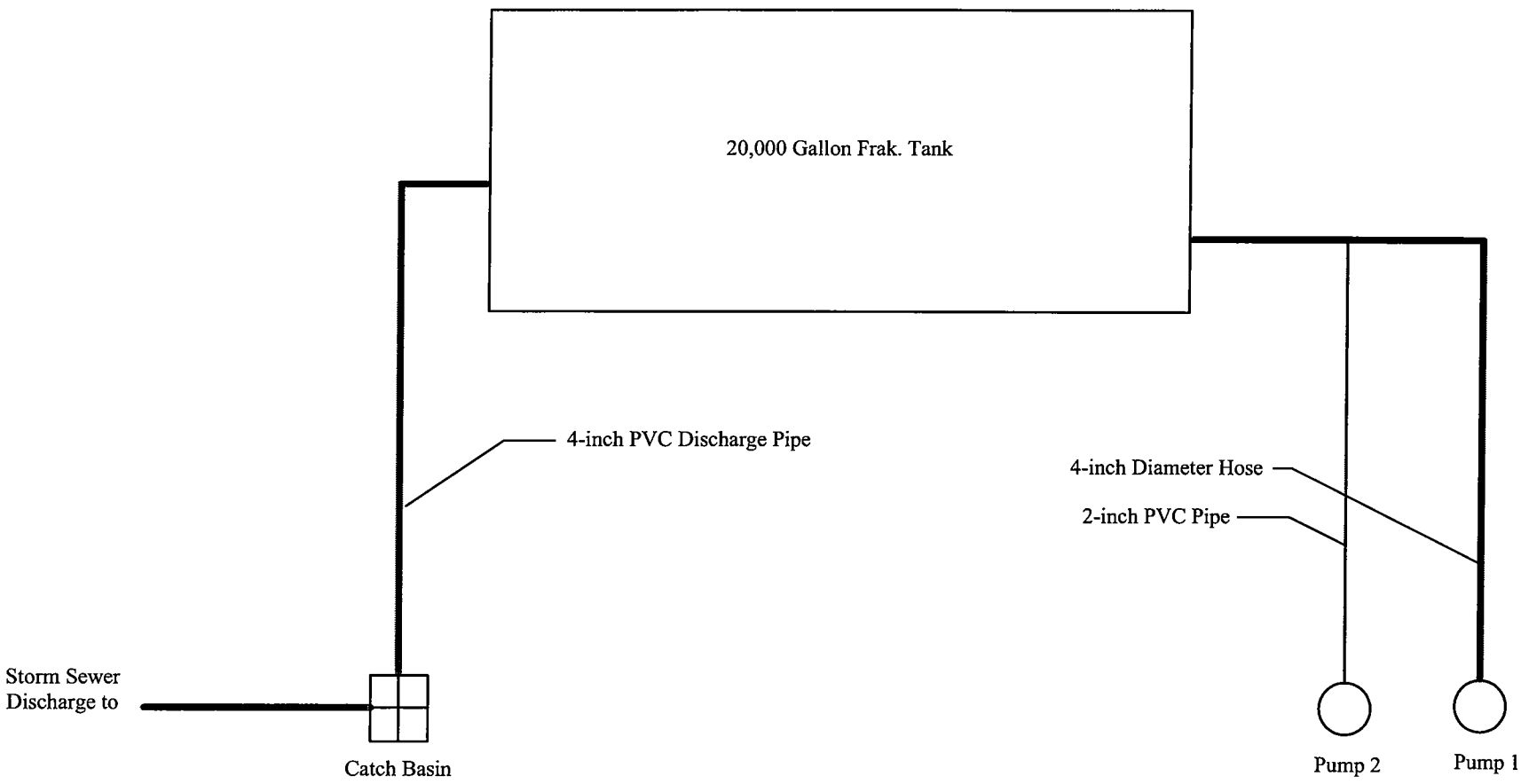
Parkway Heights
203 Chelsea & 13-15
Crescent Streets
Everett, MA

Figure 2. NPDES Permit - Pump, Tank and Discharge Set Up.

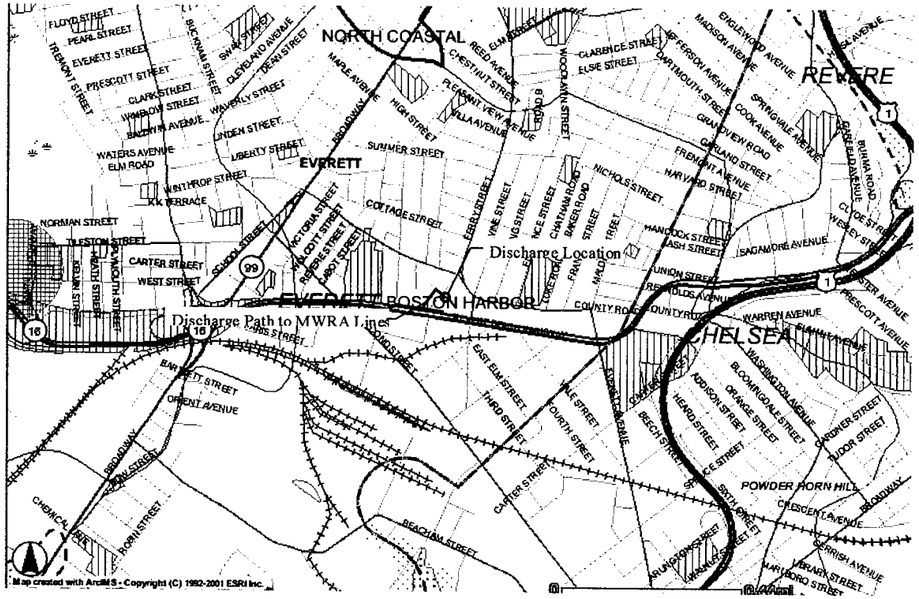
May 31, 2005

Scale 1" = 40'

GeoHydroCycle, Inc.



Not to Scale	Figure 3. Schematic Layout of Dewatering System.	NPDES Permit Parkway Heights Chelsea and Crescent Streets Everett, MA
GeoHydroCycle, Inc.		



DEP MCP 21e Map Legend

- Zone IIs
- IWPAs
- Zone A
- Sole Source Aquifers
- Solid Waste Sites
- Protected Openspace
- ACECs
- NHESP Estimated Habitat of Rare Wildlife in Wetland Areas
- Certified Vernal Pools 2003 NHESP
- Subbasins
- Mass Major Basins
- DEP Region
- Town Arcs
- County Boundaries

Public Water Supplies

- COMMUNITY PUBLIC WATER SUPPLY - GROUNDWATER
- COMMUNITY PUBLIC WATER SUPPLY - SURFACE WATER
- NON COMMUNITY PUBLIC WATER SUPPLY

Aquifers, By Yield

- HIGH YIELD
- MEDIUM YIELD

Non Potential Drinking Water Source Area

- HIGH YIELD
- MEDIUM YIELD

FEMA Floodplains

- 100 YEAR FLOODPLAIN

Hydrography

- WATER
- RESERVOIR
- WETLANDS
- SALTWATER WETLANDS
- FLATS SHOALS

Rivers and Streams

- PERENNIAL
- INTERMITTENT
- SHORELINE
- MAN MADE SHORE
- DAM
- AQUEDUCT

MHD Roads

- LIMITED ACCESS HIGHWAY
- MULTILANE HWY NOT LIMITED ACCESS
- OTHER NUMBERED HWY
- MAJOR ROAD - COLLECTOR
- MINOR STREET OR ROAD RAMP

Tracks and Trails MHD

- TRACK
- TRAIL

Transmission Lines

- PIPELINE
- POWERLINE
- TRAIN

0 2,000

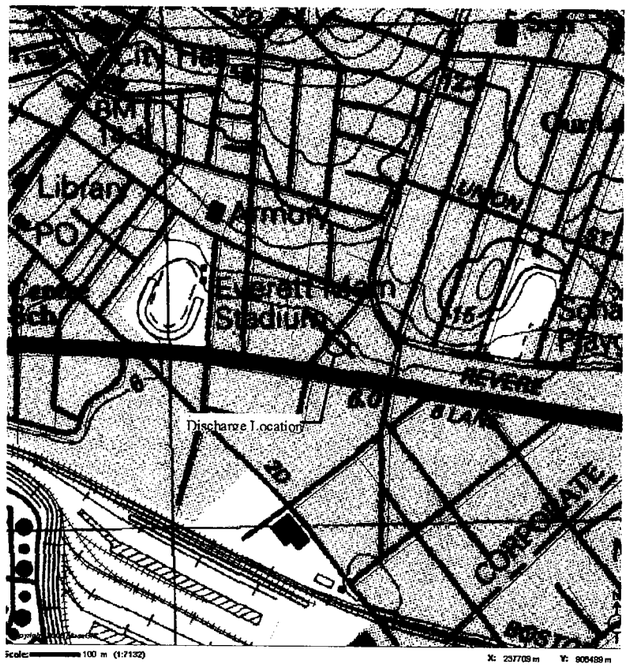
Scale in feet

Figure 4. 21E Map.

Base Map: USGS 21E Map

GeoHydroCycle, Inc.

Project No.	GHC# 04051.1			NPDES Permit Parkway Heights Chelsea and Crescent Streets Everett, Massachusetts
Drafted	LCB	Checked	KAR	
Date	10/7/05	Rev	10/7/05	



Legend:

State Registry of Historic Places Points Labels

State Registry of Historic Places Points Labels

State Registry of Historic Places Points

State Registry of Historic Places Points

Massachusetts Towns

MA Town Boundaries..Outlines

0 1,000

Scale in feet

Base Map: MassGIS

Figure 5. State Registry of Historic Places.

GeoHydroCycle, Inc.

Project No.	GHC# 04051.1			NPDES Permit Parkway Heights Chelsea and Crescent Streets Everett, Massachusetts
Drafted	LCB	Checked	KAR	
Date	10/7/05	Rev	10/7/05	

Appendix D - Copy of Letter to the MWRA Engineering Department

GeoHydroCycle, Inc.

Hazardous Waste
Water Supply

Assessment
Remediation
Analyses
Permitting
Modeling
Software

October 7, 2005

Engineering Department
MWRA
Charlestown Navy Yard
100 First Ave.
Boston, MA 02129

re: Remediation General Permit
NPDES Exclusion #MA-04I-102
GHC #04051.1

To Whom it May Concern:

GeoHydroCylce, Inc. (GHC), an environmental consulting company, on behalf of our client is discharging groundwater to a storm drain located on Crescent Street in Everett, Massachusetts, under NPDES exclusion #MA-05I-026. In addition to the NPDES exclusion, the EPA is requiring that a new permit, Remediation General Permit (RGP), be issued to replace the NPDES exclusion. The application for the RGP, in the form of a Notice of Intent (NOI), requires that the permittee identify the pathway that the discharge takes to its receiving waters.

On October 4, 2005, GHC personnel visited the City of Everett, Engineering Department in order to identify the discharge pathway. It was determined by Mr. Peter E. Messina, a City of Everett Engineer, that the catch basin on Crescent Street discharges to drainage lines on Ferry Street, which then discharge to MWRA lines on Revere Beach Parkway in Everett. In response to this determination, GHC is requesting that the MWRA provide information on the path that this Revere Beach Parkway line takes to its receiving waters.

We look forward to your reply in the near future. If you have any questions, please call (617) 527-8074.

Sincerely,
GeoHydroCycle, Inc.

Laurie Boehl

151B California Street
Newton, Massachusetts
02458

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MWRA Letter.lwp

Appendix E - Receiving Waters Information

Receiving Waters State Classification, 7Q10 Calculation, and 303(d) Classification

GHC is currently in the process of determining the discharge path from the Crescent Street catch basin to the receiving waters. On October 4, 2005, GHC personnel visited the City of Everett, Engineering Department in order to identify the discharge pathway. It was determined by Mr. Peter E. Messina, a City of Everett Engineer, that the catch basin on Crescent Street discharges to drainage lines on Ferry Street, which then discharge to MWRA lines on Revere Beach Parkway in Everett. In response to this determination, GHC wrote a letter to the MWRA Engineering Department requesting information on the path that this Revere Beach Parkway line takes to its receiving waters, refer to Appendix C for a copy of that letter.

Upon GHC's receival of information from the MWRA regarding the location of discharge to the receiving waters along with the discharge path, GHC will proceed with the determination of the following: State Water Quality Classification of Receiving Water, Reported or Calculated 7Q10 of Receiving Water, and the 303(d) Water Quality Impaired or Limited Water Classification.

Upon GHC's determination of the receiving waters, based on the MWRA's response, GHC will proceed to consult the two services (U.S. Fish and Wildlife Service and National Marine Fisheries Service).

Appendix F - National Register of Historic Places

National Register of Historic Places:

GHC used Massachusetts GIS (MassGIS) in order to search for historic properties eligible for listing on the National Register of Historic Places located on the Site or in proximity to the discharge. Based on MassGIS, GHC determined that there are no properties classified in the State Registry of Historic Places on the Site, nor in the proximity of the discharge. See Figure 5 in Appendix B for a Historical Places Map.

Appendix G - Supplemental Information

Table 3
Parkway Heights, Everett
NPDES Exclusion #MA-04I-102
Influent and Effluent Water Sampling Results
Sampling Results from 11/29/2004-4/11/2005

PAH (µg/L)	Inflow 1 11/29/2004	Outflow 1 11/29/2004	Inflow 2 12/1/2004	Outflow 2 12/1/2004	Inflow 3 12/10/2004	Outflow 3 12/10/2004	Inflow 4 3/16/2005	Outflow 4 3/16/2005	Inflow 5 3/23/2005	Outflow 5 3/23/2005	Limit
Napthalene	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	NT	NT	100
2-Methylnapthalene	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	NT	NT	100
Acenapthelene	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	NT	NT	100
Acenapthene	<0.50	<0.50	2.650	<0.50	<0.50	<0.50	<0.50	<0.50	NT	NT	100
Florene	<0.50	<0.50	1.83	<0.50	<0.50	<0.50	<0.50	<0.50	NT	NT	100
Phenanthrene	<0.50	<0.50	11.0	<0.50	1.53	<0.50	<0.50	<0.50	NT	NT	100
Anthracene	<0.50	<0.50	1.85	<0.50	<0.50	<0.50	<0.50	<0.50	NT	NT	100
Flouranthene	<0.50	<0.50	14.5	<0.50	2.79	<0.50	<0.50	<0.50	NT	NT	100
Pyrene	<1.25	<1.25	11.5	<1.25	2.62	<1.25	<1.25	<1.25	NT	NT	100
Benz[a]Anthracene	<0.50	<0.50	6.48	<0.50	1.74	<0.50	<0.50	<0.50	NT	NT	10
Chrysene	<0.50	<0.50	6.31	<0.50	1.62	<0.50	<0.50	<0.50	NT	NT	10
Benzo[b]Fluoranthene	<0.50	<0.50	5.35	<0.50	3.97	<0.50	<0.50	<0.50	NT	NT	10
Benzo[k]Fluoranthene	<1.00	<1.00	3.19	<1.00	3.18	<1.00	<1.00	<1.00	NT	NT	10
Benzo[a]Pyrene	<0.20	<0.20	4.77	<0.20	1.82	<0.20	<0.20	<0.20	NT	NT	10
Ideno[1,2,3-Cd]Pyrene	<0.50	<0.50	3.85	<0.50	<0.50	<0.50	<0.50	<0.50	NT	NT	10
Dibenzo[a,h]Anthracene	<0.50	<0.50	1.50	<0.50	<0.50	<0.50	<0.50	<0.50	NT	NT	10
Benzo[g,h,i]Perylene	<1.00	<1.00	4.85	<1.00	<1.00	<1.00	<1.00	<1.00	NT	NT	100
Total Petroleum Hydrocarbons (mg/L)											
TPH	0.670	0.610	0.473	0.450	1.550	0.560	0.363	0.270	NT	NT	5
Total Suspended Soils (mg/L)											
TSS	534	946	13,700	1,020	187,000	113	7,930	6,260	329	566	50
MtBE (µg/L)											
MtBE	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	7.55	8.33	NT	NT	20

PAH (µg/L)	Inflow 6 3/25/2005	Outflow 6 3/25/2005	Inflow 7 3/29/2005	Outflow 7 3/29/2005	Inflow 8 4/5/2005	Outflow 8 4/5/2005	Inflow 9 4/11/2005	Outflow 9 4/11/2005	Limit
Napthalene	<0.75	<0.75	<0.75	<0.75	<0.75	8.3	<0.75	<0.75	100
2-Methylnapthalene	<0.75	<0.75	<0.75	<0.75	<0.75	35	<0.75	<0.75	100
Acenapthelene	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	100
Acenapthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Florene	<0.50	<0.50	<0.50	<0.50	<0.50	2.16	<0.50	<0.50	100
Phenanthrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Flouranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Pyrene	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	100
Benz[a]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Chrysene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[b]Fluoranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[k]Fluoranthene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	10
Benzo[a]Pyrene	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	10
Ideno[1,2,3-Cd]Pyrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Dibenzo[a,h]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[g,h,i]Perylene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	100
Total Petroleum Hydrocarbons (mg/L)									
TPH	0.416	0.464	<0.200	0.200	<0.200	<0.200	<0.200	<0.200	5
Total Suspended Soils (mg/L)									
TSS	301	245	873	152	29.0	20.0	79.0	14.0	50
MtBE (µg/L)									
MtBE	<5.00	<5.00	5.2	20.2	<5.00	<5.00	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested

Table 2
Parkway Heights, Everett
NPDES Exclusion #MA-04I-102
Influent and Effluent Water Sampling Results
Sampling Results from 4/19/2005-5/18/2005

PAH (µg/L)	Inflow 10 4/19/2005	Outflow 10 4/19/2005	Inflow 11 4/25/2005	Outflow 11 4/25/2005	Influent 12 5/3/2005	Effluent 12 5/3/2005	Influent 13 5/6/2005	Effluent 13 5/6/2005	Influent 14 5/18/2005	Effluent 14 5/18/2005	Limit
Napthalene	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	100
2-Methylnapthalene	<0.75	<0.75	<0.75	1.31	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	100
Acenapthelene	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	100
Acenapthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Florene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Phenanthrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Flouranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Pyrene	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	100
Benz[a]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Chrysene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[b]Fluoranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[k]Fluoranthene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	10
Benzo[a]Pyrene	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	10
Ideno[1,2,3-Cd]Pyrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Dibenzo[a,h]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[g,h,i]Perylene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	100
Total Petroleum Hydrocarbons (mg/L)											
TPH	<0.20	0.231	0.308	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	5
Total Suspended Soils (mg/L)											
TSS	265	37	303	**159**	5,490	**64**	10	44	<4.0	<4.0	50
MtBE (µg/L)											
MtBE	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested

Table 1
Parkway Heights, Everett
NPDES Exclusion #MA-041-102
Influent and Effluent Water Sampling Results
Sampling Results from 5/25/2005-6/17/2005

PAH (µg/L)	Influent 15 5/25/2005	Effluent 15 5/25/2005	Influent 16 6/2/2005	Effluent 16 6/2/2005	Influent 17 6/8/2005	Effluent 17 6/8/2005	Influent 18 6/17/2005	Effluent 18 6/17/2005	Limit
Napthalene	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	100
2-Methylnapthalene	<0.75	<0.75	<0.75	1.31	<0.75	<0.75	<0.75	<0.75	100
Acenapthelene	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	100
Acenapthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Florene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Phenanthrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Flouranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	100
Pyrene	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	<1.25	100
Benz[a]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Chrysene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[b]Fluoranthene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[k]Fluoranthene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	10
Benzo[a]Pyrene	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	10
Ideno[1,2,3-Cd]Pyrene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Dibenzo[a,h]Anthracene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10
Benzo[g,h,i]Perylene	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	100
Total Petroleum Hydrocarbons (mg/L)									
TPH	<0.20	0.231	<0.2	<0.20	<0.20	<0.20	<0.20	<0.20	5
Total Suspended Soils (mg/L)									
TSS	<4.0	**84**	<4.0	<4.0	<4.0	<4.0	8	<0.20	50
MtBE (µg/L)									
MtBE	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested

GeoHydroCycle,Inc.

6/23/2005

Table 1
Parkway Heights, Everett
NPDES Exclusion#MA-041-102
Influent and Effluent Water Sampling Results
Sampling Results for 7/15/2005

PAH (µg/L)	Influent 19 7/15/2005	Effluent 19 7/15/2005	Limit
Napthalene	<0.824	<0.843	100
2-Methylnapthalene	<0.824	<0.843	100
Acenapthelene	<0.275	<0.281	100
Acenapthene	<0.549	<0.562	100
Florene	<0.549	<0.562	100
Phenanthrene	<0.549	<0.562	100
Anthracene	<0.549	<0.562	100
Flouranthene	<0.549	<0.562	100
Pyrene	<1.37	<1.40	100
Benz[a]Anthracene	<0.549	<0.562	10
Chrysene	<0.549	<0.562	10
Benzo[b]Fluoranthene	<1.10	<1.12	10
Benzo[k]Fluoranthene	<1.10	<1.12	10
Benzo[a]Pyrene	<0.220	<0.225	10
Ideno[1,2,3-Cd]Pyrene	<0.549	<0.562	10
Dibenzo[a,h]Anthracene	<0.549	<0.562	10
Benzo[g,h,i]Perylene	<1.10	<1.12	100
Total Petroleum Hydrocarbons (mg/L)			
TPH	<0.206	<0.247	5
Total Suspended Soils (mg/L)			
TSS	<4.00	<4.00	50
MtBE (µg/L)			
MtBE	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested

Table 1
Parkway Heights, Everett
NPDES Exclusion #MA-041-102
Influent and Effluent Water Sampling Results
Sampling Results for 8/17/2005

PAH (µg/L)	Influent 20 8/17/2005	Effluent 20 8/17/2005	Limit
Napthalene	<0.802	<0.893	100
2-Methylnapthalene	<0.802	<0.893	100
Acenapthelene	<0.267	<0.298	100
Acenapthene	<0.535	<0.595	100
Florene	<0.535	<0.595	100
Phenanthrene	<0.535	<0.595	100
Anthracene	<0.535	<0.595	100
Flouranthene	<0.535	<0.595	100
Pyrene	<1.34	<1.49	100
Benz[a]Anthracene	<0.535	<0.595	10
Chrysene	<0.535	<0.595	10
Benzo[b]Fluoranthene	<1.07	<1.19	10
Benzo[k]Fluoranthene	<1.07	<1.19	10
Benzo[a]Pyrene	<0.214	<0.238	10
Ideno[1,2,3-Cd]Pyrene	<0.535	<0.595	10
Dibenzo[a,h]Anthracene	<0.535	<0.595	10
Benzo[g,h,i]Perylene	<1.07	<1.19	100
Total Petroleum Hydrocarbons (mg/L)			
TPH	<0.200	<0.200	5
Total Suspended Soils (mg/L)			
TSS	<4.00	<4.00	50
MtBE (µg/L)			
MtBE	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested

Table 1
Parkway Heights, Everett
NPDES Exclusion #MA-04I-102
Influent and Effluent Water Sampling Results
For 9/13/05

PAH (µg/L)	Influent 21 9/13/2005	Effluent 21 9/13/2005	Limit
2-Methylnapthalene	<0.750	<0.750	100
Acenapthelene	<0.500	<0.500	100
Acenapthene	<0.250	<0.250	100
Anthracene	<0.500	<0.500	100
Benz[a]Anthracene	<0.500	<0.500	10
Benzo[a]Pyrene	<0.200	<0.200	10
Benzo[b]Fluoranthene	<1.00	<1.00	10
Benzo[g,h,i]Perylene	<1.00	<1.00	100
Benzo[k]Fluoranthene	<1.00	<1.00	10
Chrysene	<0.500	<0.500	10
Dibenzo[a,h]Anthracene	<0.500	<0.500	10
Flouranthene	<0.500	<0.500	100
Florene	<0.500	<0.500	100
Ideno[1,2,3-Cd]Pyrene	<0.500	<0.500	10
Napthalene	<0.750	<0.750	100
Phenanthrene	<0.500	<0.500	100
Pyrene	<1.25	<1.25	100
Total Petroleum Hydrocarbons (mg/L)			
TPH	<0.200	<0.202	5
Total Suspended Soils (mg/L)			
TSS	<4.00	<4.00	50
MtBE (µg/L)			
MtBE	<5.00	<5.00	20

Values in **BOLD** exceed Limits
NT - Not Tested