Capaccio
Environmental Engineering, Inc.

"Helping Industry and the Environment Prosper"

Certified Mail RRR 7005 1160 0002 0129 8093

April 18, 2006

Mr. George Papadopolous
US Environmental Protection Agency
RGP-NOC Processing
Municipal Assistance Unit (CMU)
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

RE: **EPA Remediation General Permit Notice of Intent**
Tisbury Shell
86 Beach Road
Tisbury, Massachusetts
RTN 4-14290

Dear Mr. Papadopolous,

On behalf of R.M. Packer Co., Inc. (PACKER), Capaccio Environmental Engineering, Inc. (CAPACCIO) hereby submits the enclosed Notice of Intent with supporting documentation for an EPA Remediation General Permit (RGP) for the above-referenced location. The RGP is required to treat and discharge hydrocarbon-impacted from dewatering activities during installation of new gasoline underground storage tanks (USTs) at the facility. Figure 1 is a Site Location Map indicating the location of the property and Figure 2 is a Site Plan showing the layout of the property, location of the proposed tankfield and the location of the discharge point.

Groundwater will be encountered during installation of the new USTs. Groundwater will be evacuated to a frac tank for temporary storage prior to discharge. Discharge of the groundwater will be through a bag filter and a granular activated carbon unit. The groundwater treatment system will be designed to accommodate a maximum flow of 50 gallons per minute. A flow meter and flow totalizer will be placed immediately prior to discharge of the treated groundwater. Flow rates will be periodically monitored throughout discharging and the total amount of groundwater discharged will be recorded at the end of each day.

Treated groundwater will be discharged directly to the Vineyard Haven Harbor, located adjacent to the property. The discharge will be monitored in accordance with the RGP with in-line sample ports for the influent and effluent sample locations. Please note that the Vineyard Haven Harbor is listed as a Class SA waterway. However, per Mr. Mike Gildesgame of the Massachusetts Department of Conservation and Recreation, that area of the Vineyard Haven Harbor is not classified as an "Ocean Sanctuary". Therefore, discharge to the Vineyard Haven Harbor adjacent to the property is acceptable with his Department.

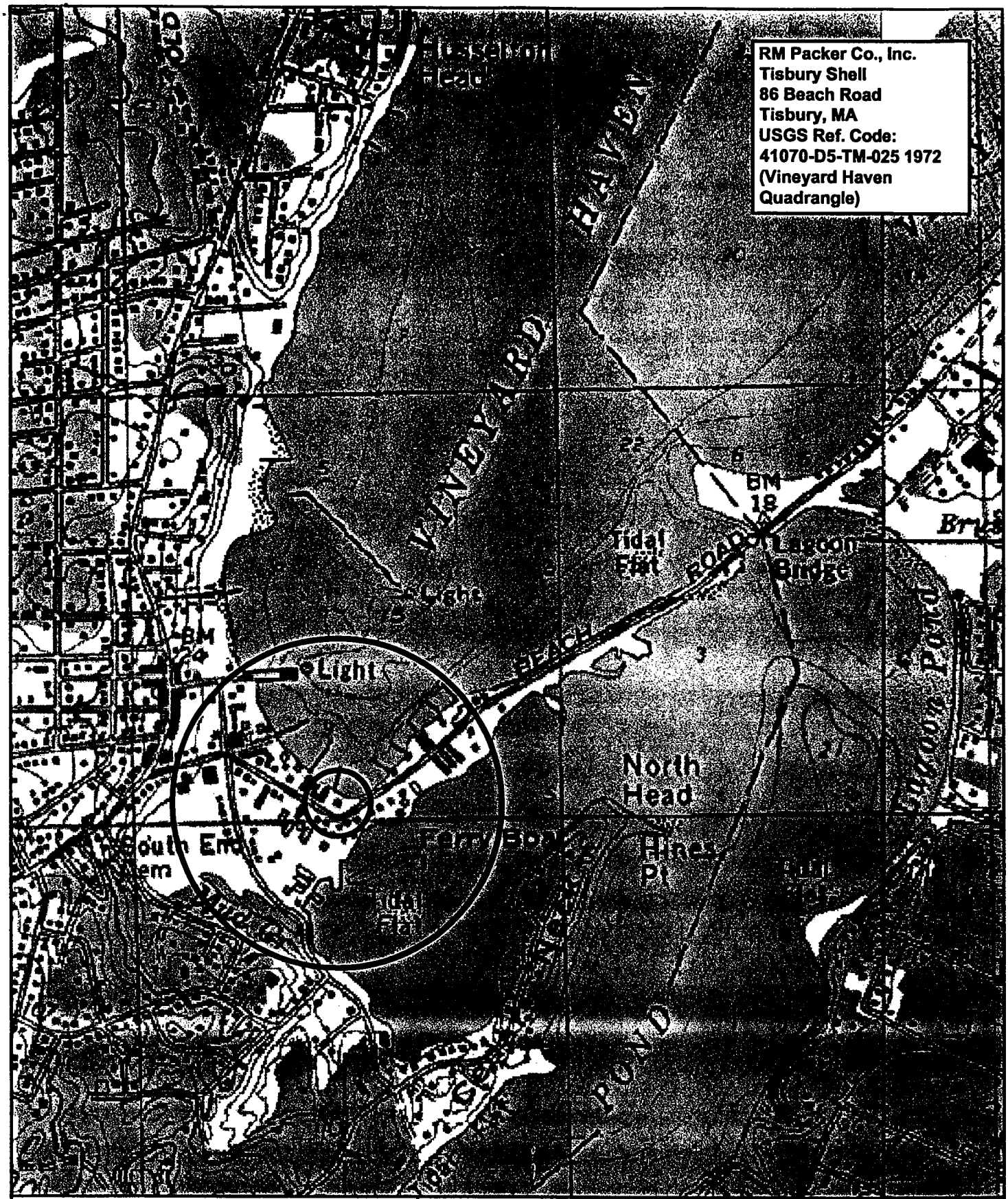
If you have any questions or require additional information, please do not hesitate to contact me at (508) 970-0033, ext. 18.

Sincerely,
Capaccio Environmental Engineering, Inc.

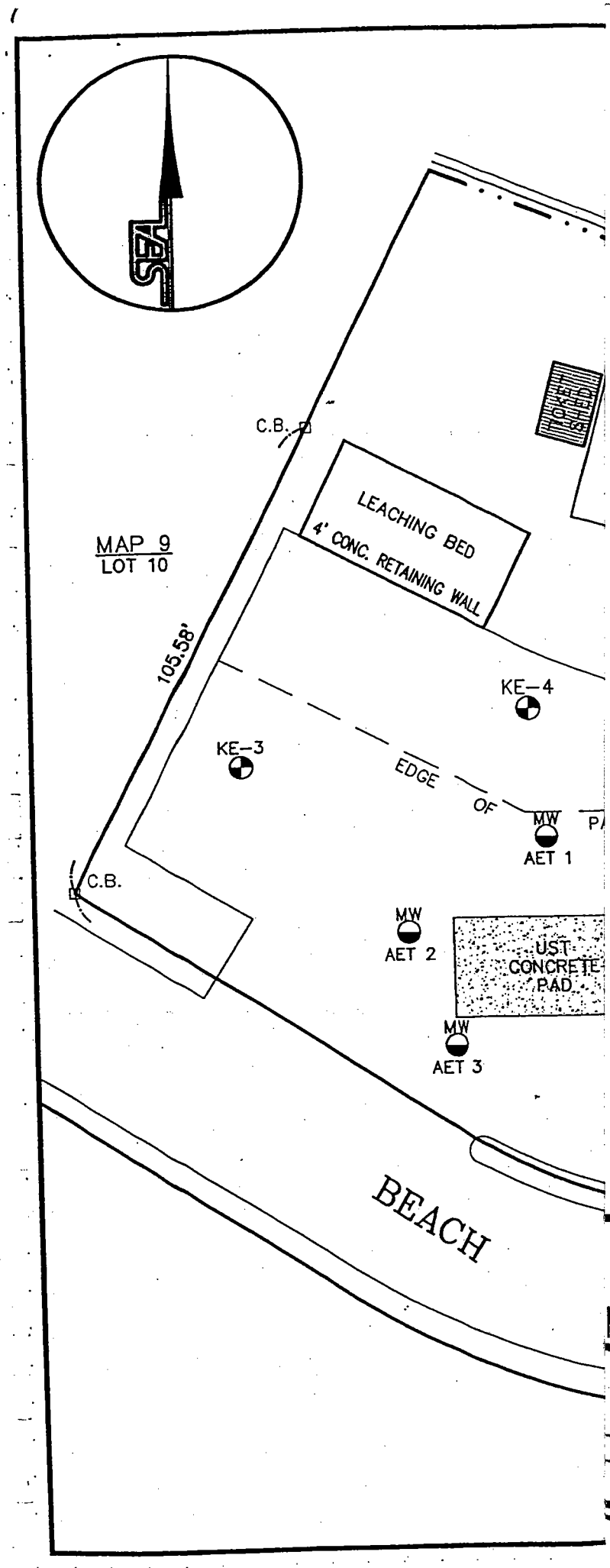
Dawn Horter

Dawn Horter, CPG, LSP
Senior Hydrogeologist

pc: Ralph Packer
MF 03-008G



CLIENT: RM Packer Co., Inc. Tisbury, MA		Figure 1	Capaccio Environmental Engineering, Inc. 293 Boston Post Road-West Marlborough, MA 01752 (508) 970-0033 * www.capaccio.com "Helping Industry and the Environment Prosper"	
TITLE: Site Location Map	NORTH	SCALE: 1" = 2083' JOB # 03-008G DATE: 03-13-06	DR BY: TJL CK BY: REV: -	SIZE: A



T1,T2 = TRANSECT 1 & TRANSECT 2
X = SAMPLING LOCATION

MONITORING WELL TOP OF CASING ELEVATIONS DATUM: N.G.V.D. 1929
AET 1 – 5.21
AET 2 – 5.13
AET 3 – 4.79
AET 4 – 4.55
AET 5 – 5.06

SITE: TISBURY TEXACO
BEACH ROAD
MARTHA'S VINEYARD, MASSACHUSETTS

PREPARED FOR:
KAEGAEL ENVIRONMENTAL INC.

SCALE	DATE	ACAD FILE	FIGURE
1" = 30'	3/12/04	01049M9-11	2

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:

<table>
<tr><td colspan="2">a) Name of facility/site:
Tisbury Shell</td><td colspan="4">Facility/site address:
86 Beach Road, Tisbury, Massachusetts 02568</td></tr>
<tr><td>Location of facility/site:
longitude:_____ latitude:_____
-70° 35' 52" 41° 27' 10"</td><td>Facility SIC code(s):
5541</td><td colspan="4">Street:
86 Beach Road</td></tr>
<tr><td colspan="2">b) Name of facility/site owner: R.M. Packer Co., Inc.</td><td colspan="4">Town: Tisbury</td></tr>
<tr><td colspan="2" rowspan="2">Email address of owner:</td><td rowspan="2">State:
MA</td><td rowspan="2">Zip:
02568</td><td rowspan="2">County:
Dukes</td></tr>
<tr><td colspan="2">Telephone no.of facility/site owner: (508) 693-0900</td></tr>
<tr><td colspan="2">Fax no. of facility/site owner:</td><td colspan="3" rowspan="2">Owner is (check one): 1. Federal____ 2. State/Tribal_____
3. Private ✓ 4. other, if so, describe:</td></tr>
<tr><td colspan="2">Address of owner (if different from site):</td></tr>
<tr><td colspan="5">Street: 188 Beach Road</td></tr>
<tr><td>Town: Tisbury</td><td>State: MA</td><td>Zip: 02568</td><td colspan="2">County: Dukes</td></tr>
<tr><td rowspan="2">c) Legal name of operator:
R.M. Packer Co., Inc.</td><td colspan="4">Operator telephone no: (508) 693-0900</td></tr>
<tr><td colspan="2">Operator fax no.:</td><td colspan="2">Operator email:</td></tr>
<tr><td colspan="5">Operator contact name and title: Ralph M. Packer, Jr., Treasurer</td></tr>
</table>

Address of **operator** (if different from owner):	Street:		
Town:	State:	Zip:	County:

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:
Exacation dewatering activities for the purpose of installing underground storage tanks at a gasoline service station.

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, ft^3/s)? Max. flow 0.11 Average flow 0.04 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. Average flow is in cubic feet per second and is estimated.

3) Latitude and longitude of each discharge within 100 feet: pt.1:long. -70° 35' 52" lat. 41° 27' 11"; 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):	5) Is the discharge intermittent ✓ or seasonal ____? Is discharge ongoing Yes ____ No ✓ ?
c) Expected dates of discharge (mm/dd/yy): start 06/01/06 end 08/01/06	
d) Please attach a line drawing or flow schematic showing water flow through the facility including: 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 (G)	160.2	2,000	2x106		2x106	
2. Total Residual Chlorine		✓	1	G	330.5	5,000	8,400		8,400	
3. Total Petroleum Hydrocarbons		✓	1	G	8100M	200	2,300		2,300	
4. Cyanide	✓		1	G	355.2	10	ND		ND	
5. Benzene		✓	1	G	8260B	1	860		860	
6. Toluene		✓	1	G	8260B	1	2,800		2,800	
7. Ethylbenzene		✓	1	G	8260B	1	490		490	
8. (m,p,o) Xylenes		✓	1	G	8260B	1	3,500		3,500	
9. Total BTEX[4]		✓	1	G	8260B	1	7,650		7,650	

[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 (1,2- Dibromo-methane)	✓		1	G	8260B	1	ND		ND	
11. Methyl-tert-Butyl Ether (MtBE)		✓	1	G	8260B	2	7		7	
12. tert-Butyl Alcohol (TBA)	✓		1	G	8260B	50	ND		ND	
13. tert-Amyl Methyl Ether (TAME)	✓		1	G	8260B	2	ND		ND	
14. Naphthalene		✓	1	G	8260B	1	180		180	
15. Carbon Tetra-chloride	✓		1	G	8260B	1	ND		ND	
16. 1,4 Dichlorobenzene	✓		1	G	8260B	1	ND		ND	
17. 1,2 Dichlorobenzene	✓		1	G	8260B	1	ND		ND	
18. 1,3 Dichlorobenzene	✓		1	G	8260B	1	ND		ND	
19. 1,1 Dichloroethane	✓		1	G	8260B	1	ND		ND	
20. 1,2 Dichloroethane	✓		1	G	8260B	1	ND		ND	
21. 1,1 Dichloroethylene	✓		1	G	8260B	1	ND		ND	
22. cis-1,2 Dichloro-ethylene	✓		1	G	8260B	1	ND		ND	
23. Dichloromethane (Methylene Chloride)	✓		1	G	8260B	5	ND		ND	
24. Tetrachloroethylene	✓		1	G	8260B	1	ND		ND	

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	✓		1	G	8260B	1	ND		ND	
26. 1,1,2 Trichloroethane	✓		1	G	8260B	1	ND		ND	
27. Trichloroethylene	✓		1	G	8260B	1	ND		ND	
28. Vinyl Chloride	✓		1	G	8260B	1	ND		ND	
29. Acetone	✓		1	G	8260B	1	ND		ND	
30. 1,4 Dioxane	✓		1	G	8260B	100	ND		ND	
31. Total Phenols		✓	1	G	8270C	10	48		48	
32. Pentachlorophenol	✓		1	G	8270C	10	ND		ND	
33. Total Phthalates [5] (Phthalate esthers)	✓		1	G	8270C	10	ND		ND	
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	✓		1	G	8270C	10	ND		ND	
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	✓		1	G	EPH	5	ND		ND	
a. Benzo(a) Anthracene	✓		1	G	EPH	5	ND		ND	
b. Benzo(a) Pyrene	✓		1	G	EPH	5	ND		ND	
c. Benzo(b)Fluoranthene	✓		1	G	EPH	5	ND		ND	
d. Benzo(k) Fluoranthene	✓		1	G	EPH	5	ND		ND	
e. Chrysene	✓		1	G	EPH	5	ND		ND	

[5] 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	G	EPH	5	ND		ND	
g. Indeno(1,2,3-cd) Pyrene	✓		1	G	EPH	5	ND		ND	
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	✓		1	G	EPH	5	ND		ND	
h. Acenaphthene	✓		1	G	EPH	5	ND		ND	
i. Acenaphthylene	✓		1	G	EPH	5	ND		ND	
j. Anthracene	✓		1	G	EPH	5	ND		ND	
k. Benzo(ghi) Perylene	✓		1	G	EPH	5	ND		ND	
l. Fluoranthene	✓		1	G	EPH	5	ND		ND	
m. Fluorene	✓		1	G	EPH	5	ND		ND	
n. Naphthalene-		✓	1	G	EPH	5	70		70	
o. Phenanthrene	✓		1	G	EPH	5	ND		ND	
p. Pyrene	✓		1	G	EPH	5	ND		ND	
37. Total Polychlorinated Biphenyls (PCBs)	✓		1	G	8082	1	ND		ND	
38. Antimony	✓		1	G	200.7	100	ND		ND	
39. Arsenic	✓		1	G	200.7	100	ND		ND	
40. Cadmium	✓		1	G	200.7	5	ND		ND	
41. Chromium III		✓	1	G	200.7	30	160		160	
42. Chromium VI	✓		1	G	3500	20	ND		ND	

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		✓	1	G	200.7	50	390		390	
44. Lead		✓	1	G	200.7	40	510		510	
45. Mercury		✓	1	G	245.1	.5	.7		.7	
46. Nickel		✓	1	G	200.7	20	130		130	
47. Selenium	✓		1	G	200.7	200	ND		ND	
48. Silver	✓		1	G	200.7	1	ND		ND	
49. Zinc		✓	1	G	200.7	20	830		830	
50. Iron		✓	1	G	200.7	50	1X105		1X105	
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? Cr III, Cu, Pb, Ni, Zn, Fe
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: Discharge is to the Vineyard Haven Harbor, not a stream. Assume >100 DF DF: >100	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: Pb, Fe

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:

Groundwater will be pumped from the excavation to a frac tank (10,000 gallon to 50,000 gallon), a transfer pump will remove groundwater from the frac tank, pass it through a bag filter and a granular activated carbon unit. The system will operate a maximum of 50 gpm intermittently when the tank is full. The average discharge is estimated at 20 gpm.

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 20 Maximum flow rate of treatment system 50 Design flow rate of treatment system 50

d) A description of chemical additives being used or planned to be used (attach MSDS sheets):

NA

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:

Discharge will be directed directly to the Vineyard Haven Harbor, located adjacent to the property.

c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water:
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 SA,

e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water NA cfs
Please attach any calculation sheets used to support stream flow and dilution calculations.

f) Is the receiving water a listed 303(d) water quality impaired or limited water? Yes___ No✓ If yes, for which pollutant(s)?

Is there a TMDL? Yes___ No✓ If yes, for which pollutant(s)?

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✓
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?
Yes_____ No✓ Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes_____ No✓

7. Supplemental information. :

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

The property presently and historically has operated as a gasoline service station. According to the Town of Tisbury, all surface water discharge points along Beach Road convey water to the Vineyard Haven Harbor. Discharge to the Vineyard Haven Harbor, immediately adjacent to the property, is the most feasible pathway to a surface water discharge. The Vineyard Haven Harbor is classified as a Class SA waterway. According to Mr. Mike Gildesgame of the Massachusetts Department of Conservation and Recreation, that area of the Vineyard Haven Harbor is not classified as "Ocean Sanctuary". Thus, he stated that discharge to the Vineyard Haven Harbor adjacent to the property is acceptable.

This permit is for dewatering of an excavation to install new gasoline underground storage tanks at the service station. The site is the subject of a release of gasoline that has been reported to the MADEP. The site is currently in Phase IV of the MCP.

Due to the presence of the property in Dukes County, which has species listed in the Endangered and Threated Species List, attached please find correspondence from the Massachusetts Division of Fisheries & Wildlife and the United States Department of the Interior Fish and Wildlife Service. These correspondences indicate that no state-listed rare plants or animals or examplary natural communities and no federally-listed or proposed, threatened or endangered species of critical habitat are known to occur within the project area.

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.

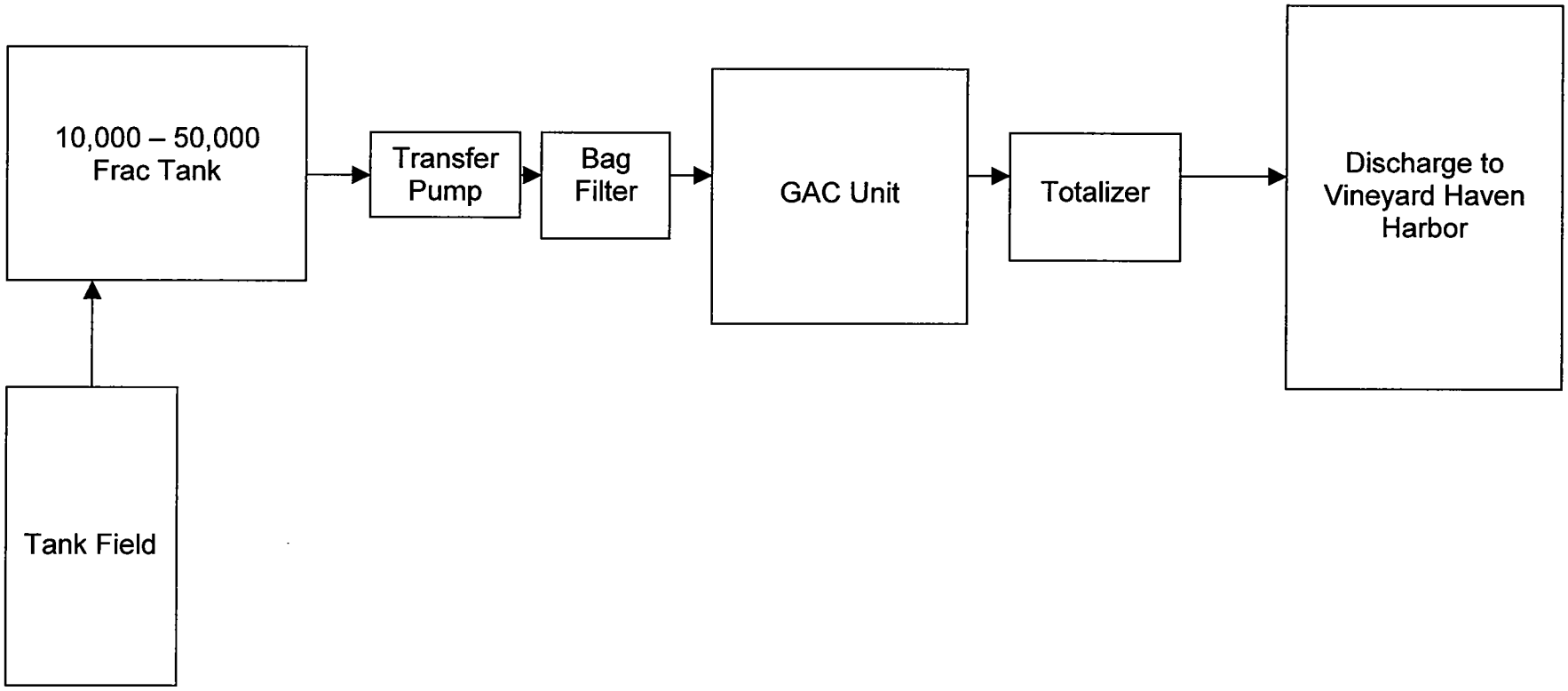
Facility/Site Name: Tisbury Shell

Operator signature: Ruth Rocker

Title: Treasurer

Date: 3/23/06

PROCESS FLOW DIAGRAM – DEWATERING TREATMENT SYSTEM (TYPICAL)



R.I. Analytical

Specialists in Environmental Services

CERTIFICATE OF ANALYSIS

Capaccio Environmental Eng.
Attn: Ms. Dawn Horter
293 Boston Post Road - West
Marlborough, MA 01752

Date Received: 3/28/06
Date Reported: 4/5/06
P.O. #:
Work Order #: 0603-05307

DESCRIPTION: RM PACKER - TISBURY SHELL - 86 BEACH ROAD VINEYARD HAVEN, MA

Subject sample(s) has/have been analyzed by our Warwick, R.I. laboratory with the attached results.

Reference: All parameters were analyzed by U.S. EPA approved methodologies and all NELAC requirements were met. The specific methodologies are listed in the methods column of the Certificate Of Analysis.

Data qualifiers (if present) are explained in full at the end of a given sample's analytical results.

Certification #: RI-033, MA-RI015, CT-PH-0508, ME-RI015
NH-253700 A & B, USDA S-41844, NY-11726

If you have any questions regarding this work, or if we may be of further assistance, please contact us.

Approved by:

Mike Hobin
Data Reporting

enc: Chain of Custody

R.I. Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS

Capaccio Environmental Eng.
Date Received: 3/28/06
Work Order #: 0603-05307

Approved by: _____
Data Reporting

Sample #: 001
SAMPLE DESCRIPTION: AET 4
SAMPLE TYPE: GRAB
SAMPLE DATE/TIME: 3/27/2006 @ 14:00

PARAMETER	SAMPLE RESULTS	DET. LIMIT	UNITS	METHOD	DATE ANALYZED	ANALYST
T. SUSPENDED SOLIDS	2200	2.0	mg/l	EPA 160.2	3/30/06	LGB
T. RESIDUAL CHLORINE	8.4	5.0	mg/l	EPA 330.5	3/28/06	ML
HEXAVALENT CHROMIUM	<0.02	0.02	mg/l	SM3500-CR D	3/28/06	EC
TOTAL CYANIDE	<0.01	0.01	mg/l	EPA 335.2	3/31/06	EC
TPH						
TPH GC/FID	2300	200	ug/l	SW846 8100M	3/31/06	CY
Extraction date	Extracted			SW846 3510	3/29/06	KR
PCB						
Aroclor-1016	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1221	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1232	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1242	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1248	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1254	<1	1	ug/l	SW-846 8082	3/30/06	MFT
Aroclor-1260	<1	1	ug/l	SW-846 8082	3/30/06	MFT
SURROGATE			RANGE	SW-846 8082	3/30/06	MFT
Tetrachloro-m-xylene (TCMX)	44		30-150%	SW-846 8082	3/30/06	MFT
Decachlorobiphenyl	26*		30-150%	SW-846 8082	3/30/06	MFT
Extraction date	Extracted			SW846 3510	3/28/06	MC
EPH/PAH						
C9-C18 Aliphatics	85	20	ug/l	MADEP	4/3/06	NR
C19-C36 Aliphatics	<20	20	ug/l	MADEP	4/3/06	NR
C11-C22 Aromatics	110	20	ug/l	MADEP	4/3/06	NR
Total EPH	200		ug/l	MADEP	4/3/06	NR
TARGET PAH ANALYTES					4/3/06	NR
Naphthalene	70	5	ug/l	MADEP	4/3/06	NR
2-Methylnaphthalene	9.4	5	ug/l	MADEP	4/3/06	NR
Acenaphthylene	<5	5	ug/l	MADEP	4/3/06	NR
Acenaphthene	<5	5	ug/l	MADEP	4/3/06	NR
Fluorene	<5	5	ug/l	MADEP	4/3/06	NR
Phenanthrene	<5	5	ug/l	MADEP	4/3/06	NR
Anthracene	<5	5	ug/l	MADEP	4/3/06	NR
Fluoranthene	<5	5	ug/l	MADEP	4/3/06	NR
Pyrene	<5	5	ug/l	MADEP	4/3/06	NR
Benzo(a)anthracene	<5	5	ug/l	MADEP	4/3/06	NR
Chrysene	<5	5	ug/l	MADEP	4/3/06	NR
Benzo(b)fluoranthene	<5	5	ug/l	MADEP	4/3/06	NR
Benzo(k)fluoranthene	<5	5	ug/l	MADEP	4/3/06	NR
Benzo(a)pyrene	<5	5	ug/l	MADEP	4/3/06	NR
Indeno(1,2,3-cd)pyrene	<5	5	ug/l	MADEP	4/3/06	NR
Dibenzo(a,h)anthracene	<5	5	ug/l	MADEP	4/3/06	NR

R.I. Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS

Capaccio Environmental Eng.
Date Received: 3/28/06
Work Order #: 0603-05307

Approved by: _____
Data Reporting

Sample #: 001
SAMPLE DESCRIPTION: AET 4
SAMPLE TYPE: GRAB
SAMPLE DATE/TIME: 3/27/2006 @ 14:00

PARAMETER	SAMPLE RESULTS	DET. LIMIT	UNITS	METHOD	DATE ANALYZED	ANALYST
Benzo(g,h,i)perylene	<5	5	ug/l	MADEP	4/3/06	NR
SURROGATES			RANGE		4/3/06	NR
Chloro-octadecane	47		40-140%	MADEP	4/3/06	NR
Ortho-terphenyl	72		40-140%	MADEP	4/3/06	NR
FRACTIONATION SURROGATES			RANGE		4/3/06	NR
2-Fluorobiphenyl	80		40-140%	MADEP	4/3/06	NR
2-Bromonaphthalene	72		40-140%	MADEP	4/3/06	NR
Extraction date	Extracted			MADEP	3/29/06	OA
Volatile Organic Compounds						
Benzene	860	1	ug/l	SW-846 8260B	3/30/06	BAS
Bromobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Bromochloromethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Bromodichloromethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Bromoform	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Bromomethane	<10	10	ug/l	SW-846 8260B	3/30/06	BAS
n-Butylbenzene	54	1	ug/l	SW-846 8260B	3/30/06	BAS
sec-Butylbenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
tert-Butylbenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Carbon Tetrachloride	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Chlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Chloroethane	<5	5	ug/l	SW-846 8260B	3/30/06	BAS
Chloroform	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Chloromethane	<5	5	ug/l	SW-846 8260B	3/30/06	BAS
2-Chlorotoluene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
4-Chlorotoluene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Dibromochloromethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2-Dibromo-3-Chloropropane	<2	2	ug/l	SW-846 8260B	3/30/06	BAS
1,2-Dibromoethane(EDB)	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Dibromomethane	<2	2	ug/l	SW-846 8260B	3/30/06	BAS
1,2-Dichlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,3-Dichlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,4-Dichlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Dichlorodifluoromethane	<5	5	ug/l	SW-846 8260B	3/30/06	BAS
1,1-Dichloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2-Dichloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1-Dichloroethene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
cis-1,2-Dichloroethene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
trans-1,2-Dichloroethene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2-Dichloropropane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,3-Dichloropropane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
2,2-Dichloropropane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1-Dichloropropene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Ethylbenzene	490	1	ug/l	SW-846 8260B	3/30/06	BAS

R.I. Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS

Capaccio Environmental Eng.
Date Received: 3/28/06
Work Order #: 0603-05307

Approved by: _____
Data Reporting

Sample #: 001
SAMPLE DESCRIPTION: AET 4
SAMPLE TYPE: GRAB
SAMPLE DATE/TIME: 3/27/2006 @ 14:00

PARAMETER	SAMPLE RESULTS	DET. LIMIT	UNITS	METHOD	DATE ANALYZED	ANALYST
Hexachlorobutadiene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Isopropylbenzene	35	1	ug/l	SW-846 8260B	3/30/06	BAS
p-Isopropyltoluene	4	1	ug/l	SW-846 8260B	3/30/06	BAS
Methylene Chloride	<5	5	ug/l	SW-846 8260B	3/30/06	BAS
Naphthalene	180	1	ug/l	SW-846 8260B	3/30/06	BAS
n-Propylbenzene	56	1	ug/l	SW-846 8260B	3/30/06	BAS
Styrene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1,1,2-Tetrachloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1,2,2-Tetrachloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Tetrachloroethene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Toluene	2800	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2,3-Trichlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2,4-Trichlorobenzene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1,1-Trichloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,1,2-Trichloroethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Trichloroethene	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
Trichlorofluoromethane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2,3-Trichloropropane	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
1,2,4-Trimethylbenzene	730	1	ug/l	SW-846 8260B	3/30/06	BAS
1,3,5-Trimethylbenzene	180	1	ug/l	SW-846 8260B	3/30/06	BAS
Vinyl Chloride	<1	1	ug/l	SW-846 8260B	3/30/06	BAS
o-Xylene	1000	1	ug/l	SW-846 8260B	3/30/06	BAS
m&p-Xylene	2500	1	ug/l	SW-846 8260B	3/30/06	BAS
MTBE	7	2	ug/l	SW-846 8260B	3/30/06	BAS
Tertiary Amyl Methyl Ether	<2	2	ug/l	SW-846 8260B	3/30/06	BAS
Tertiary Butanol (TBA)	<50	50	ug/l	SW-846 8260B	3/30/06	BAS
1,4-Dioxane	<100	100	ug/l	SW-846 8260B	3/30/06	BAS
SURROGATES			RANGE	SW-846 8260B	3/30/06	BAS
Dibromofluoromethane	101		86-118%	SW-846 8260B	3/30/06	BAS
Toluene-d8	100		88-110%	SW-846 8260B	3/30/06	BAS
4-Bromofluorobenzene	100		86-115%	SW-846 8260B	3/30/06	BAS
1,2 Dichloroethane-d4	93		80-120%	SW-846 8260B	3/30/06	BAS
SEMI-VOLATILE ORGANIC COMPOUNDS						
Bis(2-ethylhexyl)phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Butylbenzyl phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Di-n-butyl phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Diethyl phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Dimethyl phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Di-n-octyl phthalate	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
4-Chloro-3-methylphenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2-Chlorophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2,4-Dichlorophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2,4-Dimethylphenol	48	10	ug/l	SW-846 8270C	3/30/06	RGM

R.I. Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS

Capaccio Environmental Eng.
Date Received: 3/28/06
Work Order #: 0603-05307

Approved by: _____
Data Reporting

Sample #: 001
SAMPLE DESCRIPTION: AET 4
SAMPLE TYPE: GRAB **SAMPLE DATE/TIME:** 3/27/2006 @ 14:00

PARAMETER	SAMPLE RESULTS	DET. LIMIT	UNITS	METHOD	DATE ANALYZED	ANALYST
2-Methyl-4,6-dinitrophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2,4-Dinitrophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2-Nitrophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
4-Nitrophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Pentachlorophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
Phenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2,4,5-Trichlorophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2,4,6-Trichlorophenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
3,4-Methylphenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
2-Methylphenol	<10	10	ug/l	SW-846 8270C	3/30/06	RGM
SURROGATES			RANGE	SW-846 8270C	3/30/06	RGM
Phenol-d5	30		10-94%	SW-846 8270C	3/30/06	RGM
2-Fluorophenol	34		21-100%	SW-846 8270C	3/30/06	RGM
2,4,6-Tribromophenol	78		10-123%	SW-846 8270C	3/30/06	RGM
Nitrobenzene-d5	52		35-114%	SW-846 8270C	3/30/06	RGM
2-Fluorobiphenyl	71		43-116%	SW-846 8270C	3/30/06	RGM
P-Terphenyl-d14	70		33-141%	SW-846 8270C	3/30/06	RGM
DISSOLVED METALS						
ANTIMONY	<0.1	0.1	mg/l	EPA 200.7	4/4/06	LD
ARSENIC	<0.1	0.1	mg/l	EPA 200.7	4/4/06	LD
CADMIUM	<0.005	0.005	mg/l	EPA 200.7	4/4/06	LD
CHROMIUM	0.16	0.03	mg/l	EPA 200.7	4/4/06	LD
COPPER	0.39	0.05	mg/l	EPA 200.7	4/4/06	LD
IRON	100	0.05	mg/l	EPA 200.7	4/5/06	LD
LEAD	0.51	0.04	mg/l	EPA 200.7	4/4/06	LD
MERCURY	0.0007	0.0005	mg/l	EPA 245.1	4/3/06	REA
NICKEL	0.08	0.02	mg/l	EPA 200.7	4/4/06	LD
SELENIUM	<0.2	0.2	mg/l	EPA 200.7	4/4/06	LD
SILVER	<0.0010	0.0010	mg/l	EPA 200.9	4/4/06	REA
ZINC	0.83	0.02	mg/l	EPA 200.7	4/4/06	LD

Total Residual Chlorine - Increased detection limit due to sample matrix.

All QA/QC procedures required by the EPH Method were followed.
All Performance/Acceptance Standards for the required QA/QC procedures were achieved or otherwise stated.
No significant modifications were made to the EPH Method with the following exception: C-range values may have been blank subtracted to minimize the effect of leachable plasticizers from the SPE cartridges.

Method 8082:* Surrogate outside QA/QC criteria. Additional sample is unavailable for re-extraction.

51 Fremont Street Needham, MA 02494 Tel: 781-455-0003, Fax: 781-455-8336

EST environmental & industrial

CHAIN OF CUSTODY RECORD

Laboratory: RIAL

Client	Capaccio Environmental Engineering		
Address	293 Boston Post Road Marlborough, MA		
Contact	Dawn Horter		
Phone #	978-270-0193	Fax:	508-970-0028
Project Name	RM Packer - Tisbury Shell		
Address	86 Beach Road Vineyard Haven, MA		
Contact	Ralph Packer	tel:	508-889-4949
Location ID #		Fax:	
Description	Groundwater Sampling	PO#	

MATRIX
1. Wastewater
2. Groundwater
3. Drinking Water
4. Soil
5. Surface Water
6. Other _____

EST to Invoice: Capaccio
Lab to Invoice: Capaccio
Lab Report to: Capaccio
Billing Reference: BR

Field ID / Point of Collection	Collection Date	Collection Time	Matrix	# of bottles Glass	# of bottles Plastic	# of bottles VOA's	Preservation HCL	NaOH	HNO3	H2SO4	MEOH	Other	None	EPH w/ Targets	VOC 8260, plus TAME, TBA, EDB, 1,4 dioxane	Phthalate (plus bis 2 ethythexyl Phthalate) **	PCBs	Metals (field filtered) Sb, Ag, Cd, Cr, Cu, Pb, * Hg, Ni, Se, Ag, Zn, Fe	Chromium +6, TSS, TRC	Phenols (including pentachlorophenol) **	TPH	Cyanide				Comments:
AET 4	3/27/06	1400	2	See Below			See Below							x	x	x	x	x	x	x	x	x				

Turnaround Information

- ☐ Std. 10 Day Turnaround
- ☐ 7 Day *RUSH*
- ☐ 4 Day *RUSH*
- ☐ _____
- ☐ _____
- ☐ 1-3 Day *RUSH*

Approved By: _____

QA/QC

SPECIAL QA/QC or DATA Requirements:

MCP Data Enhancement GW-3

Bottle set: 3 VOAS w/ HCL; 3 1L Ambers no pres; 1 500P w/ HNO3; 1LP no pres; 2 1L Ambers w/ H2SO4; 1 250P w/ NaOH.

Additional Information

* per attached email (RL) 3/28/06.

** run from 8270 & VOC list per M. Foley 3/28/06 (RL)

0603-05307

Sample Custody must be documented below each time samples change possession, including courier delivery.

	Date Time:	Received By:	Date Time:
Relinquished by Sampler:	3/28/06 0700	1	03/28/06 0900
Relinquished by Sampler: 2	03/28/06 1117	Received By: 2	Date Time:
Relinquished by Sampler: 3	Date Time:	Received By: 3	Date Time:

Seal # _____ Preserve where applicable ☐ On Ice ☐ Temp. _____

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

MassWildlife

Wayne F. MacCallum, *Director*

February 10, 2006

Capaccio Environmental Engineering, Inc.
Attn: Dawn Horter
293 Boston Post Road West
Marlborough, MA 01752

Re: Tisbury Shell
Beach Road
Tisbury, MA
NHESP Tracking Number: 06-19144

Dear Ms. Horter,

Thank you for contacting the Natural Heritage and Endangered Species Program ("NHESP") of the MA Division of Fisheries & Wildlife for information regarding state-protected rare species in the vicinity of the site identified above.

At this time we are not aware of any state-listed rare plants or animals or exemplary natural communities in the immediate vicinity of this site.

This evaluation is based on the most recent information available in the NHESP database, which is constantly being expanded and updated through ongoing research and inventory. Should your site plans change, or new rare species information become available, this evaluation may be reconsidered. Please note that this determination addresses only the matter of **rare** wildlife habitat and does not pertain to other wildlife habitat issues that may be pertinent to the proposed project.

If you have any questions regarding this review please call Jenna Garvey, Environmental Review Assistant, at ext. 303.

Sincerely,

Thomas W. French

Thomas W. French, Ph.D.
Assistant Director

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

February 13, 2006

Reference:	Project	Location
	NPDES Remediation Permit, storage tanks	Vineyard Haven, MA

Dawn Horter
Capaccio Environmental Engineering, Inc.
293 Boston Post Road
Marlborough, MA 01752

Dear Ms. Horter:

This responds to your recent correspondence requesting information on the presence of federally-listed and/or proposed endangered or threatened species in relation to the proposed activity(ies) referenced above.

Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

Thank you for your coordination. Please contact us at 603-223-2541 if we can be of further assistance.

Sincerely yours,

Michael J. Amaral

Michael J. Amaral
Endangered Species Specialist
New England Field Office