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October 22, 2009

Mr. Victor Alvarez
United States Environmental Protection Agency – Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Re: NPDES Remediation General Permit Notice of Intent
Boston water and Sewer Commission
Drainage, Water and Sewerage Works Improvements
080 CSO Area, Reserved Channel, South Boston

Dear Mr. Alvarez:

Fay, Spofford & Thorndike (FST) is pleased to submit this Notice of Intent (NOI) for a Remediation General Permit on behalf of the Boston Water and Sewer Commission (BWSC). BWSC is implementing a program to minimize discharge of sewerage to the harbor through the existing CSOs. This project improves the sewers and storm drains in part of South Boston, as shown on the location plan.

The construction in the general vicinity of East First Street crosses through an area of known groundwater contamination from multiple sites, including the former Coastal Oil terminal. It is anticipated that construction dewatering in this area of known contamination will encounter petroleum-contaminated groundwater.

A groundwater sample was collected from a monitoring well along the project route. Petroleum hydrocarbons were detected at a concentration of 6.65 mg/L. The laboratory results are attached. The sample was tested for all of the parameters listed on the NOI form.

Where construction requires dewatering, all groundwater water will undergo treatment prior to discharge to a storm drain. The proposed pumping and treatment scheme consists of:

Pumping of groundwater from the excavation to an 18,000 gallon frac tank to collect any free-phase oil, if encountered,

Pumping from the tank at 50 – 90 gpm through two granular activated carbon (GAC) filters in series

Mr. Victor Alvarez

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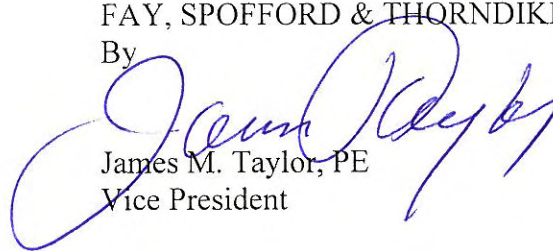
October 22, 2009

Discharge from the GAC units to a second frac tank to allow testing prior to final discharge to the storm drain system. The storm drain flows north to the Reserved Channel.

The construction contractor is LM Holdings, LLC, 540 Groton Road, Westford, MA 01886. The contractor already has submitted an NOI for a construction General Permit.

Please call Bill Beyer at 781-221-1276 if you have any questions.

Very truly yours,
FAY, SPOFFORD & THORNDIKE, LLC
By



James M. Taylor, PE
Vice President

JB-233
JTM/WCB

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: Reserved Channel Separation Facility		Facility/site address: East First Street/Farragut Road	
Location of facility/site: longitude: -71°01'31" latitude: 42°20'17"	Facility SIC code(s):	Street: See Above	
b) Name of facility/site owner: Boston Water and Sewer Commission		Town: South Boston	
Email address of owner:		State: MA	Zip: 02127 County: Suffolk
Telephone no. of facility/site owner:			
Fax no. of facility/site owner:		Owner is (check one): 1. Federal ___ 2. State/Tribal ___ 3. Private ☒ 4. other, if so, describe: ___	
Address of owner (if different from site):			
Street: 980 Harrison Ave			
Town: Boston	State: MA	Zip: 02119	County: Suffolk
c) Legal name of operator:		Operator telephone no:	
L.M. Holdings		Operator fax no.:	Operator email:
Operator contact name and title: Peter Williamson			
Address of operator (if different from owner):		Street: 540 Groton Road	
Town: Westford	State: MA	Zip: 01886	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 <u> </u> No <u> </u> ☒ 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 <u> </u> N <u> </u> ☒, if Y, number: 2. phase I or II construction storm water general permit? Y <u> </u> N <u> </u> ☒, if Y, number: 3. individual NPDES permit? Y <u> </u> N <u> </u> ☒, if Y, number: 4. any other water quality related permit? Y <u> </u> N <u> </u> ☒, if Y, number:
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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:

Dewatering for installation of sewer and drainage piping.

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 <u>0.24</u> Average flow <u>0.19</u> Is maximum flow a design value? Y <u> </u> N <u> </u> ☒ For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.
3) Latitude and longitude of each discharge within 100 feet: pt.1: long. <u> </u> lat. <u> </u>; pt.2: long. <u> </u> lat. <u> </u>; pt.3: long. <u> </u> lat. <u> </u>; pt.4: long. <u> </u> lat. <u> </u>; pt.5: long. <u> </u> lat. <u> </u>; pt.6: long. <u> </u> lat. <u> </u>; pt.7: long. <u> </u> lat. <u> </u>; pt.8: long. <u> </u> lat. <u> </u>; etc.	4) If hydrostatic testing, total volume of the discharge (gals): 5) Is the discharge intermittent <u> </u> ☒ or seasonal <u> </u>? Is discharge ongoing Yes <u> </u> No <u> </u> ☒ ?
c) Expected dates of discharge (mm/dd/yy): start <u>10/19/09</u> end <u>03/10/11</u>	
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 minimum)	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	G	SM2540-D	4000	20000	2.4	10000	1.2
2. Total Residual Chlorine	✓		1	G	HACH 8167	200	ND			
3. Total Petroleum Hydrocarbons		✓	1	G	8100M	750	20000	2.4	6650	0.8
4. Cyanide	✓		1	G	SM 4500	19.7	ND		ND	
5. Benzene		✓	1	G	EPA 8260	2	10	0.0012	ND	
6. Toluene		✓	1	G	EPA 8260	2	10	0.0012	ND	
7. Ethylbenzene		✓	1	G	EPA 8260	2	10	0.0012	ND	
8. (m,p,o) Xylenes		✓	1	G	EPA 8260	2	10	0.0012	ND	
9. Total BTEX ⁴		✓	1				20	0.0024	ND	

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

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	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)	✓		1	G	SIM	0.02	ND			
11. Methyl-tert-Butyl Ether (MtBE)	✓		1	G	SW8260	2	ND			
12. tert-Butyl Alcohol (TBA)	✓									
13. tert-Amyl Methyl Ether (TAME)	✓									
14. Naphthalene		✓	1	G	SW8260	10	1000	1.2	10	0.012
15. Carbon Tetra-chloride	✓		1	G	SW8260	2	ND			
16. 1,4 Dichlorobenzene	✓		1	G	SW8270C	1.03	ND			
17. 1,2 Dichlorobenzene	✓		1	G	SW8270C	1.03	ND			
18. 1,3 Dichlorobenzene	✓		1	G	SW8270C	1.03	ND			
19. 1,1 Dichloroethane	✓		1	GG	SW8260	2	ND			
20. 1,2 Dichloroethane	✓		1		SW8260	2	ND			
21. 1,1 Dichloroethylene	✓		1	G	SW8260	2	ND			
22. cis-1,2 Dichloro-ethylene		✓	1	G	SW8260	2	10	0.012	2.77	0.003
23. Dichloromethane (Methylene Chloride)	✓		1	G	SW8260	5	ND			
24. Tetrachloroethylene	✓		1	G	SW8260	2	ND			

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

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	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	SW8260	2	ND			
26. 1,1,2 Trichloroethane	✓		1	G	SW8260	2	ND			
27. Trichloroethylene	✓		1	G	SW8260	2	ND			
28. Vinyl Chloride	✓		1	G	SW8260	2	ND			
29. Acetone	✓		1	G	SW8260	10	ND			
30. 1,4 Dioxane			1	G		5	ND			
31. Total Phenols	✓		1	G	SW8270C	1.03	ND			
32. Pentachlorophenol	✓		1	G	SW8270C	2.56	ND			
33. Total Phthalates ⁶ (Phthalate esters)	✓		1	G	SW8270C	1.03	ND			
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	✓		1	G	SW8270C	1.03	ND			
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		✓	1	G	SW8270C	1.03	5000	0.6	10	0.0012
a. Benzo(a) Anthracene		✓	1	G	SW8270C	0.103	1000	0.12		0.0012
b. Benzo(a) Pyrene		✓	1	G	SW8270C	0.103	1000	0.12		
c. Benzo(b)Fluoranthene		✓	1	G	SW8270C	0.103	1000	0.12		
d. Benzo(k) Fluoranthene		✓	1	G	SW8270C	0.103	1000	0.12		
e. Chrysene		✓	1	G	SW8270C	1.03	1000	0.12		

⁶The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	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	SW8270C	0.103	1000	0.12	10	0.0012
g. Indeno(1,2,3-cd) Pyrene		✓	1	G	SW8270C	0.103	1000	0.12		
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		✓	1	G	SW8270C	.103	5000	0.6		
h. Acenaphthene		✓	1	G	SW8270C	1.03	1000	0.12		
i. Acenaphthylene		✓	1	G	SW8270C	1.03	1000	0.12		
j. Anthracene		✓	1	G	SW8270C	1.03	1000	0.12		
k. Benzo(ghi) Perylene		✓	1	G	SW8270C	1.03	1000	0.12		
l. Fluoranthene		✓	1	G	SW8270C	1.03	1000	0.12		
m. Fluorene		✓	1	G	SW8270C	1.03	1000	0.12		
n. Naphthalene-		✓	1	G	SW8270C	1.03	1000	0.12		
o. Phenanthrene		✓	1	G	SW8270C	1.03	1000	0.12		
p. Pyrene		✓	1	G	SW8270C	1.03	1000	0.12		
37. Total Polychlorinated Biphenyls (PCBs)	✓		1	G	SW8082	0.674	ND			
38. Antimony	✓		1	G	E200.9	1	ND			
39. Arsenic		✓	1	G	E200.9	1	70 ND	0.0024	11.8	0.0014
40. Cadmium	✓		1	G	SW6010B	4	ND			
41. Chromium III	✓		1	G	E200.7	60	ND			
42. Chromium VI	✓		1	G	SM3500	50	ND			

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	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	SW6010B	15	ND			
44. Lead		✓	1	G	SW6010B	10	60	7.2	30	3.6
45. Mercury	✓		1	G	E245.1	0.5	ND			
46. Nickel	✓		1	G	SW6010B	100	ND			
47. Selenium	✓		1	G	SW6010B	50	ND			
48. Silver	✓		1	G	E200.7	7	ND			
49. Zinc	✓		1	G	SW6010B	180	ND			
50. Iron		✓	1	G	SW6010B	60	15000	2	7280	0.87
Other (describe):										

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

<i>Step 1:</i> 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?
<i>Step 2:</i> 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
	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 <u>50</u> Maximum flow rate of treatment system <u>90</u> Design flow rate of treatment system <u>30-90</u>					
d) A description of chemical additives being used or planned to be used (attach MSDS sheets):					

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: Storm Drain to Reserved Channel in Boston Harbor						
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 discharges, 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 <u>N/A Reserved Channel</u> .						
e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water _____ 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? Yes ☒ 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 ☒

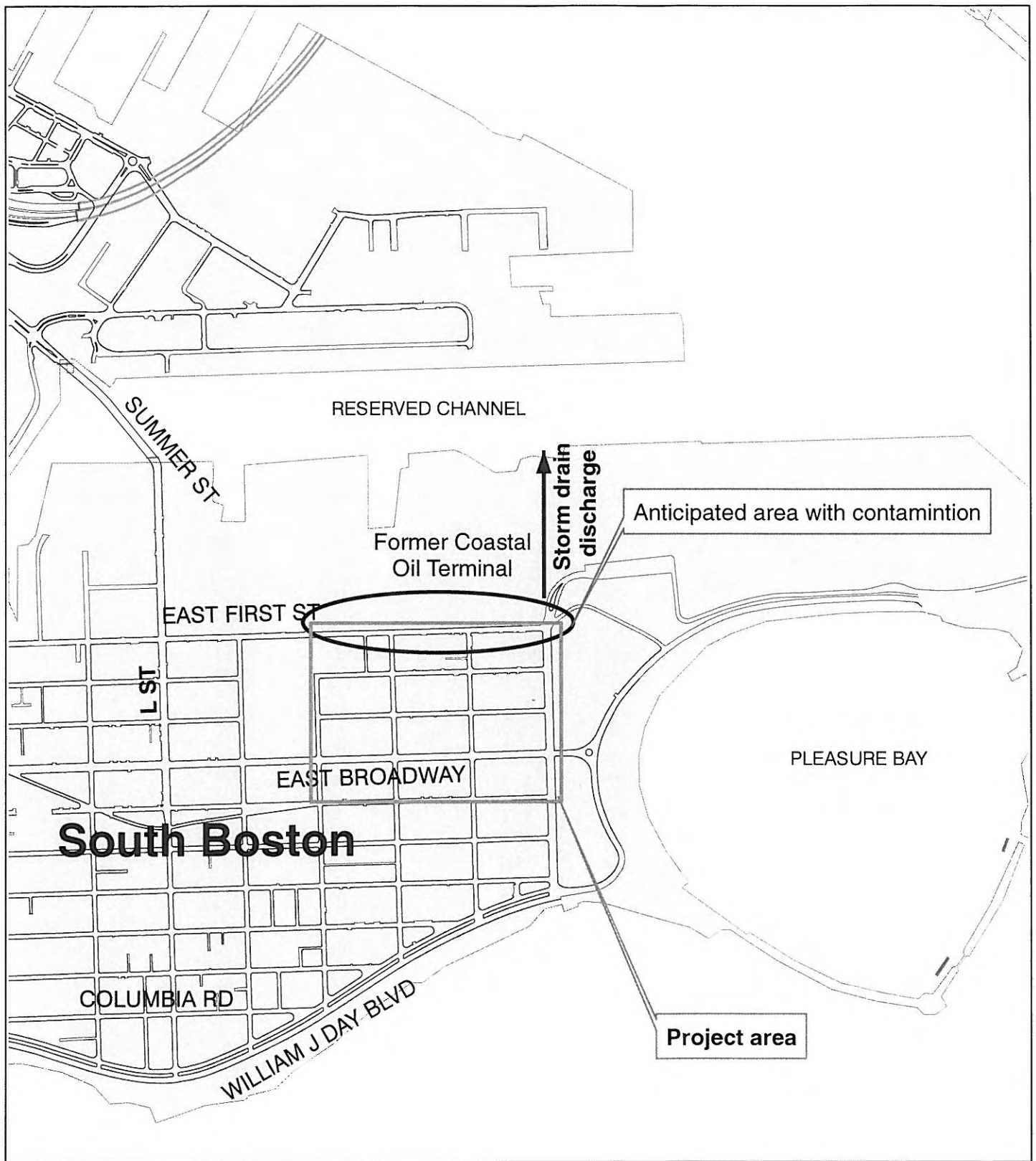
7. Supplemental information. :

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.
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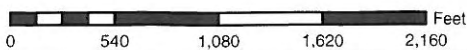
8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

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: <i>DRAINAGE, WATER & SEWERAGE WORKS IMPROVEMENTS, RESERVED CHANNEL</i>
Operator signature: <i>[Signature]</i>
Title: <i>Permitting Hydrologist</i>
Date: <i>10/22/09</i>



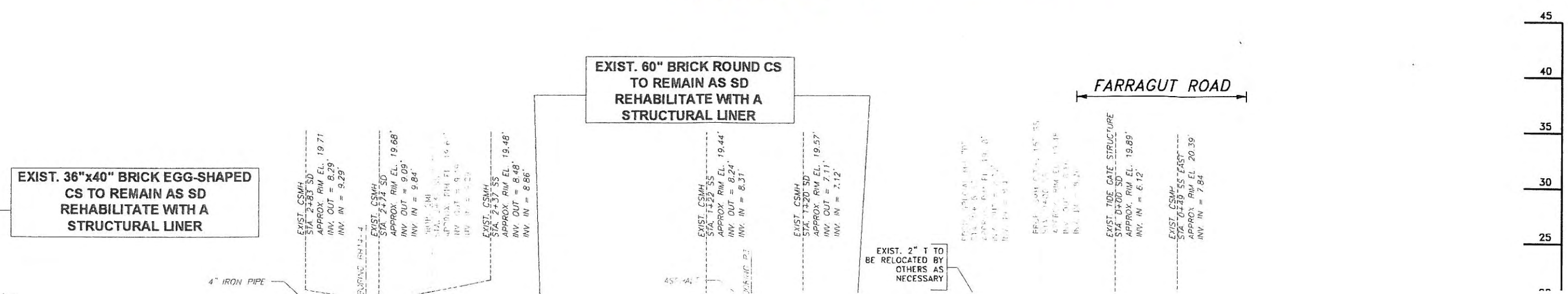
Location Plan
Boston Water And Sewer Commission
NPDES Remediation General Permit
080 CSO Area
Reserved Channel
South Boston



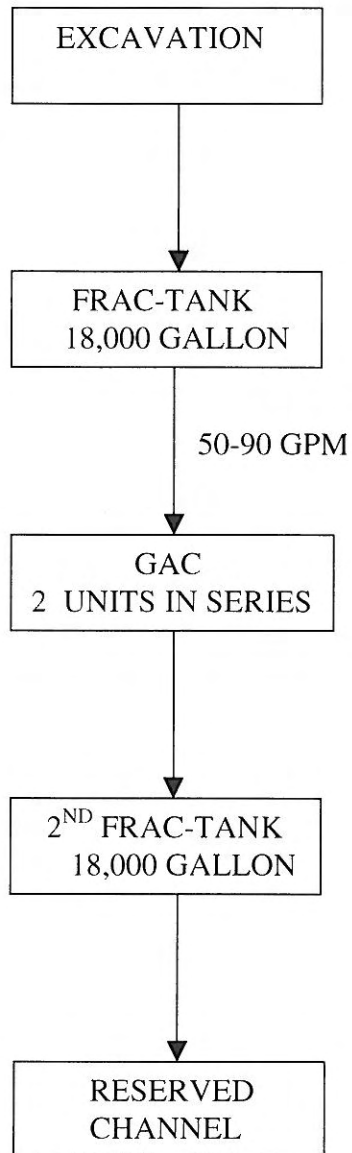
Fay, Spofford & Thorndike



DEWATERING
PROBABLY NEEDED



Proposed Treatment for Construction Dewatering
Drainage, Water and Sewerage Improvements
Reserved Channel, South Boston



ANALYTICAL REPORT



Monday, October 19, 2009

Mike DeRosa
Derosa Environmental
46 N. Main Street
Ipswich, MA 01938

GeoLabs, Inc.
45 Johnson Lane
Braintree MA 02184
Tele: 781 848 7844
Fax: 781 848 7811

TEL: (978) 356-5408
FAX: (978) 356-4211

Project: LM Holdings, South Boston
Location:

Order No.: 0910134

Dear Mike DeRosa:

GeoLabs, Inc. received 1 sample(s) on 10/9/2009 for the analyses presented in the following report.

All data for associated QC met method or laboratory specifications, except when noted in the Case Narrative.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,



Charles Morrow
Laboratory Director

For current certifications, please visit our website at www.geolabs.com

Certifications:

CT (PH-0148) - MA (M-MA015) - NH (2508) - NJ (MA009) - NY (11796) - RI (LA000252)
Accredited in Accordance with NELAC

Date: 19-Oct-09

CLIENT: Derosa Environmental
Project: LM Holdings, South Boston
Lab Order: 0910134

CASE NARRATIVE

Physical Condition of Samples

The project was received by the laboratory in satisfactory condition. The sample(s) were received undamaged, in appropriate containers with the correct preservation.

Project Documentation

The project was accompanied by satisfactory Chain of Custody documentation.

Analysis of Sample(s)

All extractable samples were extracted and analyzed and any Volatile samples were analyzed within method specified holding times and according to GeoLabs documented Standard Operating Procedure. No analytical anomalies or non-conformances were noted by the laboratory during the processing of these samples.

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT:	Derosa Environmental	Client Sample ID:	M&E-319
Lab Order:	0910134	Collection Date:	10/9/2009 7:00:00 AM
Project:	LM Holdings, South Boston	Date Received:	10/9/2009
Lab ID:	0910134-001	Matrix:	GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
TOTAL SUSPENDED SOLIDS - SM2540-D						
Total Suspended Solids	10.0	4.00		mg/L	1	10/13/2009
Analyst: FC						
TPH FINGERPRINT - 8100M						
Diesel Fuel #2	ND	0.750		mg/L	5	10/13/2009
Fuel #4	ND	0.750		mg/L	5	10/13/2009
Fuel #6	ND	0.750		mg/L	5	10/13/2009
Gasoline	ND	0.750		mg/L	5	10/13/2009
Kerosene/Jet Fuel	ND	0.750		mg/L	5	10/13/2009
Motor Oil	ND	0.750		mg/L	5	10/13/2009
Paraffin Oil	ND	0.750		mg/L	5	10/13/2009
Transformer Oil	6.65	0.750		mg/L	5	10/13/2009
Total Petroleum Hydrocarbons	6.65	0.750		mg/L	5	10/13/2009
Surr: o-Terphenyl	108	40-140		%REC	5	10/13/2009
Analyst: RuP						
POLYCHLORINATED BIPHENYLS - SW8082						
Aroclor 1016/1242	ND	0.674		µg/L	1	10/13/2009
Aroclor 1221	ND	0.674		µg/L	1	10/13/2009
Aroclor 1232	ND	0.674		µg/L	1	10/13/2009
Aroclor 1248	ND	0.674		µg/L	1	10/13/2009
Aroclor 1254	ND	0.674		µg/L	1	10/13/2009
Aroclor 1260	ND	0.674		µg/L	1	10/13/2009
Surr: Decachlorobiphenyl Sig 1	111	30-150		%REC	1	10/13/2009
Surr: Decachlorobiphenyl Sig 2	125	30-150		%REC	1	10/13/2009
Surr: Tetrachloro-m-Xylene Sig 1	88.3	30-150		%REC	1	10/13/2009
Surr: Tetrachloro-m-Xylene Sig 2	78.3	30-150		%REC	1	10/13/2009
Analyst: Admin						
TOTAL METALS BY GFAA - E200.9						
Antimony	ND	0.00100		mg/L	1	10/15/2009
Arsenic	0.0118	0.00100		mg/L	1	10/15/2009
Analyst: QS						
TOTAL METALS BY ICP - SW6010B						
Cadmium	ND	0.00400		mg/L	1	10/12/2009
Chromium	ND	0.0700		mg/L	1	10/12/2009
Copper	ND	0.0150		mg/L	1	10/12/2009
Iron	7.28	0.0600		mg/L	1	10/12/2009
Lead	0.0300	0.0100		mg/L	1	10/12/2009
Analyst: QS						

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT: Derosa Environmental
 Lab Order: 0910134
 Project: LM Holdings, South Boston
 Lab ID: 0910134-001

Client Sample ID: M&E-319
 Collection Date: 10/9/2009 7:00:00 AM
 Date Received: 10/9/2009
 Matrix: GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
TOTAL METALS BY ICP - SW6010B						Analyst: QS
Nickel	ND	0.100		mg/L	1	10/12/2009
Selenium	ND	0.0500		mg/L	1	10/12/2009
Zinc	ND	0.180		mg/L	1	10/12/2009
TOTAL SILVER - E200.7						Analyst: QS
Silver	ND	0.00700		mg/L	1	10/13/2009
TOTAL MERCURY - E245.1						Analyst: EC
Mercury	ND	0.0005		mg/L	1	10/14/2009
SEMIVOLATILE ORGANICS - SW8270C						Analyst: ZYZ
1,2,4-Trichlorobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
1,2-Dichlorobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
1,2-Dinitrobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
1,3-Dichlorobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
1,3-Dinitrobenzene	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
1,4-Dichlorobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
1,4-Dinitrobenzene	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
2,3,4,6-Tetrachlorophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,4,5-Trichlorophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,4,6-Trichlorophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,4-Dichlorophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,4-Dimethylphenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,4-Dinitrophenol	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
2,4-Dinitrotoluene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2,6-Dinitrotoluene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Chloronaphthalene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Chlorophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Methylnaphthalene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Methylphenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Nitroaniline	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
2-Nitrophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
3,3'-Dichlorobenzidine	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
3-Methylphenol/4-Methylphenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
3-Nitroaniline	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
4,6-Dinitro-2-Methylphenol	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
4-Bromophenyl Phenyl Ether	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT: Derosa Environmental
 Lab Order: 0910134
 Project: LM Holdings, South Boston
 Lab ID: 0910134-001

Client Sample ID: M&E-319
 Collection Date: 10/9/2009 7:00:00 AM
 Date Received: 10/9/2009
 Matrix: GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
SEMIVOLATILE ORGANICS - SW8270C						Analyst: ZYZ
4-Chloro-3-Methylphenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
4-Chloroaniline	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
4-Chlorophenyl Phenyl Ether	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
4-Nitroaniline	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
4-Nitrophenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Acenaphthene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Acenaphthylene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Acetophenone	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Aniline	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Anthracene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Azobenzene	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Benz(a)Anthracene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM
Benzidine	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Benzo(a)Pyrene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM
Benzo(b)Fluoranthene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM
Benzo(g,h,i)Perylene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Benzo(k)Fluoranthene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM
Benzyl Alcohol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Bis(2-Chloroethoxy)Methane	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Bis(2-Chloroethyl)Ether	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Bis(2-Chloroisopropyl)Ether	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Bis(2-Ethylhexyl)Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Butyl Benzyl Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Carbazole	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Chrysene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Dibenz(a,h)Anthracene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM
Dibenzofuran	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Diethyl Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Dimethyl Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Di-n-Butyl Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Di-n-Octyl Phthalate	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Fluoranthene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Fluorene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Hexachlorobenzene	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
Hexachlorobutadiene	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
Hexachlorocyclopentadiene	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Hexachloroethane	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Indeno(1,2,3-cd)Pyrene	ND	0.103		µg/L	1	10/14/2009 4:17:00 AM

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT: Derosa Environmental
 Lab Order: 0910134
 Project: LM Holdings, South Boston
 Lab ID: 0910134-001

Client Sample ID: M&E-319
 Collection Date: 10/9/2009 7:00:00 AM
 Date Received: 10/9/2009
 Matrix: GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
SEMIVOLATILE ORGANICS - SW8270C						Analyst: ZYZ
Isophorone	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Naphthalene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Nitrobenzene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
N-Nitrosodimethylamine	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
N-Nitrosodi-n-Propylamine	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
N-Nitrosodiphenylamine	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Pentachlorophenol	ND	2.56		µg/L	1	10/14/2009 4:17:00 AM
Phenanthrene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Phenol	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Pyrene	ND	1.03		µg/L	1	10/14/2009 4:17:00 AM
Pyridine	ND	5.13		µg/L	1	10/14/2009 4:17:00 AM
Surr: 2,4,6-Tribromophenol	88.0	15-110		%REC	1	10/14/2009 4:17:00 AM
Surr: 2-Fluorobiphenyl	52.0	30-130		%REC	1	10/14/2009 4:17:00 AM
Surr: 2-Fluorophenol	45.6	15-110		%REC	1	10/14/2009 4:17:00 AM
Surr: Nitrobenzene-d5	38.0	30-130		%REC	1	10/14/2009 4:17:00 AM
Surr: Phenol-d6	28.0	15-110		%REC	1	10/14/2009 4:17:00 AM
Surr: Terphenyl-d14	68.5	30-130		%REC	1	10/14/2009 4:17:00 AM

EDB - SIM METHOD

1,2-Dibromoethane	ND	0.020		µg/L	1	Analyst: ZYZ 10/14/2009
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VOLATILE ORGANIC COMPOUNDS - SW8260B

1,1,1,2-Tetrachloroethane	ND	2.00		µg/L	1	Analyst: ZYZ 10/13/2009 8:00:00 PM
1,1,1-Trichloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,1,2,2-Tetrachloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,1,2-Trichloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,1-Dichloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,1-Dichloroethene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,1-Dichloropropene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2,3-Trichlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2,3-Trichloropropane	ND	5.00		µg/L	1	10/13/2009 8:00:00 PM
1,2,4-Trichlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2,4-Trimethylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2-Dibromo-3-Chloropropane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2-Dichlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2-Dichloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,2-Dichloropropane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT: Derosa Environmental
 Lab Order: 0910134
 Project: LM Holdings, South Boston
 Lab ID: 0910134-001

Client Sample ID: M&E-319
 Collection Date: 10/9/2009 7:00:00 AM
 Date Received: 10/9/2009
 Matrix: GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
VOLATILE ORGANIC COMPOUNDS - SW8260B						Analyst: ZYZ
1,3,5-Trichlorobenzene	ND	5.00		µg/L	1	10/13/2009 8:00:00 PM
1,3,5-Trimethylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,3-Dichlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
1,4-Dichlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
2,2-Dichloropropane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
2-Butanone	ND	10.0		µg/L	1	10/13/2009 8:00:00 PM
2-Chlorotoluene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
2-Hexanone	ND	10.0		µg/L	1	10/13/2009 8:00:00 PM
2-Methoxy-2-Methylbutane (TAME)	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
4-Chlorotoluene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
4-Methyl-2-Pentanone	ND	5.00		µg/L	1	10/13/2009 8:00:00 PM
Acetone	ND	10.0		µg/L	1	10/13/2009 8:00:00 PM
Benzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Bromobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Bromochloromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Bromodichloromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Bromoform	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Bromomethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Carbon Disulfide	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Carbon Tetrachloride	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Chlorobenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Chloroethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Chloroform	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Chloromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
cis-1,2-Dichloroethene	2.77	2.00		µg/L	1	10/13/2009 8:00:00 PM
cis-1,3-Dichloropropene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Dibromochloromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Dibromomethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Dichlorodifluoromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Ethylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Hexachlorobutadiene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Isopropylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Methyl Tert-Butyl Ether	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Methylene Chloride	ND	5.00		µg/L	1	10/13/2009 8:00:00 PM
Naphthalene	ND	10.0		µg/L	1	10/13/2009 8:00:00 PM
n-Butylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
n-Propylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
p-Isopropyltoluene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

ANALYTICAL REPORT

Reported Date: 19-Oct-09

CLIENT: Derosa Environmental
 Lab Order: 0910134
 Project: LM Holdings, South Boston
 Lab ID: 0910134-001

Client Sample ID: M&E-319
 Collection Date: 10/9/2009 7:00:00 AM
 Date Received: 10/9/2009
 Matrix: GROUNDWATER

Analyses	Result	Det. Limit	Qual	Units	DF	Date Analyzed
VOLATILE ORGANIC COMPOUNDS - SW8260B						
sec-Butylbenzene	ND	2.00		µg/L	1	Analyst: ZYZ 10/13/2009 8:00:00 PM
Styrene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
tert-Butanol	ND	20.0		µg/L	1	10/13/2009 8:00:00 PM
tert-Butylbenzene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Tetrachloroethene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Toluene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
trans-1,2-Dichloroethene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
trans-1,3-Dichloropropene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Trichloroethene	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Trichlorofluoromethane	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Vinyl Chloride	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Xylenes, Total	ND	2.00		µg/L	1	10/13/2009 8:00:00 PM
Surr: 1,2-Dichloroethane-d4	120	70-130		%REC	1	10/13/2009 8:00:00 PM
Surr: 4-Bromofluorobenzene	106	70-130		%REC	1	10/13/2009 8:00:00 PM
Surr: Dibromofluoromethane	111	70-130		%REC	1	10/13/2009 8:00:00 PM
Surr: Toluene-d8	95.8	70-130		%REC	1	10/13/2009 8:00:00 PM
1,4-DIOXANE						
1,4-Dioxane	ND	5.00		µg/L	1	Analyst: ZYZ 10/14/2009
CYANIDE, TOTAL - SM4500-CN-C,E						
Cyanide, Total	ND	0.0197		mg/L	1	Analyst: RP 10/15/2009
TRIVALENT CHROMIUM IN WATER - 200.7&3500						
Trivalent Chromium	ND	0.060		mg/L	1	Analyst: RP 10/15/2009
HEXAVALENT CHROMIUM - SM3500-CR-D						
Chromium, Hexavalent	ND	0.0500		mg/L	1	Analyst: RP 10/9/2009 4:30:00 PM
TOTAL RESIDUAL CHLORINE - HACH 8167						
Total Residual Chlorine	ND	0.200		mg/L	1	Analyst: RP 10/9/2009 3:45:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	S	Spike Recovery outside recovery limits		

GeoLabs, Inc.

45 Johnson Lane ~ Braintree MA 02184 ~ 781 848 7844 ~ 781 848 7811

