



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

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

CERTIFIED MAIL

November 16, 2010

Joseph Callahan, Project Manager
Environmental Strategies and Management
273 West Main Street
Norton, MA 02766

Re: Authorization to discharge under the Remediation General Permit (RGP) –
MAG910000. CITGO Terminal / BELD site located at 385 Quincy Avenue, Braintree,
MA 02184, Norfolk County, Authorization # MAG910106 – Reissuance.

Dear Mr. Callahan:

Based on the review of your Notice of Intent (NOI) submitted on behalf the owner CITGO Petroleum Corporation, for the site referenced above, the U.S. Environmental Protection Agency (EPA) hereby authorizes you, as the named Operator, to discharge in accordance with the provisions of the RGP at that site. Your authorization number is listed above.

The checklist enclosed with this RGP authorization indicates the pollutants for which you are required to monitor. Also indicated on the checklist are the effluent limits, test methods and minimum levels (MLs) for each pollutant. Please note that the check list does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of this permit, including influent and effluent monitoring, narrative water quality standards, record keeping, and reporting requirements, found in Parts I and II, and Appendices I – VIII of the RGP. See EPA's website for the complete RGP and other information at:
<http://www.epa.gov/region1/npdes/mass.html#dgp>.

Please note also the following: (1) the list of pollutants attached to this authorization is subject to a recertification if the operations at the site result in a discharge lasting longer than six months, and (2) the effluent from this facility will be discharged into the Weymouth Fore River to an area denoted by the State's Coastal Drainage Area (74) as tidal and therefore, classified as a SB drainage area, and not to a fresh water drainage area class B which you reported. (See 314 CMR: Division Of Water Pollution Control Massachusetts Surface Water Quality Standards Manual. Section 4.06 (Basin

Classification and Maps), Page 127, Figure 21.). We are mentioning this change because we wanted to let you know that the effluent limits for the metals zinc and iron reported believed present in the NOI are subject to treatment requirements based on the Dilution Factor Range (DFR) of 1-5 required for coastal waters. At this DFR, the limit for zinc is 85.6 ug/L and for iron is 1,000 ug/L. EPA requires that all coastal water discharges be subject to the DFR indicated above when the effluent enters into a tidal water body. As indicated in the response to comments to the RGP community with comments about this issue, EPA allows discharges to saline waters. However, there is no dilution afforded for these discharges to calculate certain metals limits, unless a dilution factor has been approved by the State prior to submission of NOIs. In order to allow for a dilution calculation for discharges to saltwater bodies, applicants will need to prepare new or produce existing site-specific data, e.g., flow modeling, which will be reviewed by EPA and the State prior to obtaining permit limits.

This general permit and authorization to discharge will expire on September 9, 2015. This project reportedly will terminate on December 31, 2015. If for any reason the discharge terminates sooner you are required to submit a Notice of Termination (NOT) to the attention of the contact person indicated below within 30 days of project completion.

Thank you in advance for your cooperation in this matter. Please contact Victor Alvarez at 617-918-1572 or Alvarez.Victor@epa.gov, if you have any questions.

Sincerely,



David M. Webster, Chief
Industrial Permits Branch

Enclosure

cc: Kathleen Keohane, MassDEP

**2010 Remediation General Permit
Summary of Monitoring Parameters^[1]**

NPDES Permit Number:	MAG910106
Authorization Month	November, 2010
Facility/Site Name:	CITGO Terminal/ BELD
Facility/Site Address:	385 Quincy Avenue, Braintree, MA 02184, Norfolk County
	Email address of owner DGriffin@citgo.com; Phone n: 856-963-1251
Legal Name of operator:	Environmental Strategis and Management
Operator contact name, title, Phone, Email, and Address:	Joseph Callahan, Project Manager; Pn. 508-226-1811 Email:jcallahan@esm-inc.com;273 West Main St. Norton 02766
Estimated Date of Completion:	December 31, 2015
Category and Sub-Category:	Category I-Petroleum Related Site Remediation, Subcategory B - Fuel Oils and Other Oils Sites.
Receiving Water:	Weymouth Fore River.

Monitoring & Limits are applicable if checked. All samples are to be collected as grab samples

	<u>Parameter</u>	<u>Effluent Limit/Method#/ML</u> (All Effluent Limits are shown as Daily Maximum Limits, unless denoted by a **, in which case it is a Monthly Average Limit)
	1. Total Suspended Solids (TSS)	30 milligrams/liter (mg/l) **, 50 mg/l for hydrostatic testing **, Me#60.2/5mL
	2. Total Residual Chlorine (TRC) ¹	Freshwater = 11 ug/l ** Saltwater = 7.5 ug/l **/ Me#330.5/ML 20ug/L
✓	3. Total Petroleum Hydrocarbons (TPH)	5.0 mg/l/ Me# 1664A/5.0mg/LmL
	4. Cyanide (CN) ^{2, 3}	Freshwater = 5.2 ug/l ** Saltwater = 1.0 ug/l **/ Me#335.4/ML 5ug/L
✓	5. Benzene (B)	5ug/L /50.0 ug/l for hydrostatic testing only/ Me#8260C/ML 2 ug/L
✓	6. Toluene (T)	(limited as ug/L total BTEX)/ Me#8260C/ ML 2ug/L
✓	7. Ethylbenzene (E)	(limited as ug/L total BTEX))/ Me#8260C/ ML 2ug/L
✓	8. (m,p,o) Xylenes (X)	(limited as ug/L total BTEX))/ Me#8260C/ ML 2ug/L
✓	9. Total Benzene, Toluene, Ethyl Benzene, and Xylenes (BTEX) ⁴	100 ug/l)/ Me#8260C/ ML 2ug/L
	10. Ethylene Dibromide (EDB) (1,2- Dibromoethane)	0.05 ug/l/ Me#8260C/ ML 10ug/L
	11. Methyl-tert-Butyl Ether (MtBE)	70.0 ug/l /Me#8260C/ ML 10ug/L
	12.tert-Butyl Alcohol (TBA) (TertiaryButanol)	Monitor Only (ug/L)/ Me#8260C/ ML 10ug/L
	13. tert-Amyl Methyl Ether	Monitor Only (ug/L) /Me#8260C/ ML

	<u>Parameter</u>	<u>Effluent Limit/Method# /ML</u> (All Effluent Limits are shown as Daily Maximum Limits, unless denoted by a **, in which case it is a Monthly Average Limit)
	(TAME)	10ug/L
	14. Naphthalene ⁵	20 ug/l /Me#8260C/ ML 2ug/L
	15. Carbon Tetrachloride	4.4 ug/l /Me#8260C/ ML 5ug/L
	16. 1,2 Dichlorobenzene (o-DCB)	600 ug/l /Me#8260C/ ML 5ug/L
	17. 1,3 Dichlorobenzene (m-DCB)	320 ug/l /Me#8260C/ ML 5ug/L
	18. 1,4 Dichlorobenzene (p-DCB)	5.0 ug/l /Me#8260C/ ML 5ug/L
	18a. Total dichlorobenzene	763 ug/l - NH only /Me#8260C/ ML5ug/L
	19. 1,1 Dichloroethane (DCA)	70 ug/l /Me#8260C/ ML 5ug/L
	20. 1,2 Dichloroethane (DCA)	5.0 ug/l /Me#8260C/ ML 5ug/L
	21. 1,1 Dichloroethene (DCE)	3.2 ug/l/Me#8260C/ ML 5ug/L
	22. cis-1,2 Dichloroethene (DCE)	70 ug/l /Me#8260C/ ML 5ug/L
	23. Methylene Chloride	4.6 ug/l/Me#8260C/ ML 5ug/L
	24. Tetrachloroethene (PCE)	5.0 ug/l /Me#8260C/ ML 5ug/L
	25. 1,1,1 Trichloro-ethane (TCA)	200 ug/l/Me#8260C/ ML 5ug/L
	26. 1,1,2 Trichloro-ethane (TCA)	5.0 ug/l /Me#8260C/ ML 5ug/L
	27. Trichloroethene (TCE)	5.0 ug/l /Me#8260C/ ML 5ug/L
	28. Vinyl Chloride (Chloroethene)	2.0 ug/l /Me#8260C/ ML 5ug/L
	29. Acetone	Monitor Only (ug/L) /Me#8260C/ ML 50ug/L
	30. 1,4 Dioxane	Monitor Only /Me#1624C/ML50 ug/L
	31. Total Phenols	300 ug/l Me#420.1&420.2/ML 2 ug/L/ Me# 420.4 /ML50 ug/L
	32. Pentachlorophenol (PCP)	1.0 ug/l /Me#8270D/ML5ug/L,Me#604 &625/ML10ug/L
	33. Total Phthalates (Phthalate esters) ⁶	3.0 ug/L ** /Me#8270D/ML5ug/L,Me#606/ML10ug/L& Me#625/ML5ug/L
	34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	6.0 ug/l /Me#8270D/ML5ug/L,Me#606/ML10ug/L& Me#625/ML5ug/L
	35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	10.0 ug/l
	a. Benzo(a) Anthracene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
	b. Benzo(a) Pyrene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
	c. Benzo(b)Fluoranthene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
	d. Benzo(k)Fluoranthene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L,

	<u>Parameter</u>	<u>Effluent Limit/Method#/ML</u> (All Effluent Limits are shown as Daily Maximum Limits, unless denoted by a **, in which case it is a Monthly Average Limit)
		Me#610/ML5ug/L& Me#625/ML5ug/L
	e. Chrysene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
	f. Dibenzo(a,h)anthracene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
	g. Indeno(1,2,3-cd) Pyrene ⁷	0.0038 ug/l /Me#8270D/ ML5ug/L, Me#610/ML5ug/L& Me#625/ML5ug/L
✓	36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	100 ug/l
✓	h. Acenaphthene	X/Me#8270D/ML5ug/L,Me#610/ML5ug /L & Me#625/ML5ug/L
✓	i. Acenaphthylene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	j. Anthracene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	k. Benzo(ghi) Perylene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	l. Fluoranthene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
✓	m. Fluorene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	n. Naphthalene ⁵	20 ug/l / Me#8270D/ ML5ug/L, Me#610/ML5ug/L & Me#625/ML5ug/L
✓	o. Phenanthrene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
✓	p. Pyrene	X/Me#8270D/ML5ug/L,Me#610/ML5ug/L & Me#625/ML5ug/L
	37. Total Polychlorinated Biphenyls (PCBs) ^{8,9}	0.000064 ug/L / Me# 608/ ML 0.5 ug/L
✓	38. Chloride	Monitor only/Me# 300.0/ ML 0.1ug/L

		<u>Total Recoverable Metal Limit @ H ¹⁰ = 50 mg/l CaCO3 for discharges in Massachusetts (ug/l)</u> <u>11</u>		
	<u>Metal parameter</u>	<u>Freshwater</u>	<u>Saltwater</u>	
	39. Antimony	5.6/10mL		
	40. Arsenic **	10/20mL	36/20mL	
	41. Cadmium **	0.2/10ml	8.9/10mL	
	42. Chromium III (trivalent) **	48.8/15mL	100/15mL	
	43. Chromium VI (hexavalent) **	11.4/10mL	50.3/10mL	
	44. Copper **	5.2/15mL	3.7/15mL	

	<u>Metal parameter</u>	<u>Total Recoverable Metal Limit @ H¹⁰ = 50 mg/l CaCO3 for discharges in Massachusetts (ug/l) 11</u>			
		<u>Freshwater</u>	<u>Saltwater</u>		
	45. Lead **	1.3/20mL	8.5/20mL		
	46. Mercury **	0.9/0.2mL	1.1/0.2mL		
	47. Nickel **	29/20mL	8.2/20mL		
	48. Selenium **	5/20mL	71/20mL		
	49. Silver	1.2/10mL	2.2/10mL		
✓	50. Zinc **	66.6/15mL	85.6/15mL		
✓	51. Iron	1,000/20mL			

	<u>Other Parameters</u>	<u>Limit</u>
	52. Instantaneous Flow	Site specific in CFS
	53. Total Flow	Site specific in CFS
	54. pH Range for Class A & Class B Waters in MA	6.5-8.3; 1/Month/Grab ¹³
	55. pH Range for Class SA & Class SB Waters in MA	6.5-8.3; 1/Month/Grab ¹³
	56. pH Range for Class B Waters in NH	6.5-8; 1/Month/Grab ¹³
	57. Daily maximum temperature - Warm water fisheries	83°F; 1/Month/Grab ¹⁴
	58. Daily maximum temperature - Cold water fisheries	68°F; 1/Month/Grab ¹⁴
	59. Maximum Change in Temperature in MA - Any Class A water body	1.5°F; 1/Month/Grab ¹⁴
	60. Maximum Change in Temperature in MA - Any Class B water body- Warm Water	5°F; 1/Month/Grab ¹⁴
	61. Maximum Change in Temperature in MA - Any Class B water body - Cold water and Lakes/Ponds	3°F; 1/Month/Grab ¹⁴
	62. Maximum Change in Temperature in MA - Any Class SA water body - Coastal	1.5°F; 1/Month/Grab ¹⁴
	63. Maximum Change in Temperature in MA - Any Class SB water body - July to September	1.5°F; 1/Month/Grab ¹⁴
	64. Maximum Change in Temperature in MA - Any Class SB water body - October to June	4°F; 1/Month/Grab ¹⁴

Footnotes:

¹ Although the maximum values for TRC are 11ug/l and 7.5 ug/l for freshwater, and saltwater respectively, the compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI (i.e., Method 330.5, 20 ug/l).

² Limits for cyanide are based on EPA's water quality criteria expressed as micrograms per liter. There is currently no EPA approved test method for free cyanide. Therefore, total cyanide must be reported.

³ Although the maximum values for cyanide are 5.2 ug/l and 1.0 ug/l for freshwater and saltwater, respectively, the compliance limits are equal to the minimum level (ML) of the Method 335.4 as listed in Appendix VI (i.e., 10 ug/l).

⁴ BTEX = sum of Benzene, Toluene, Ethylbenzene, and total Xylenes.

⁵ Naphthalene can be reported as both a purgeable (VOC) and extractable (SVOC) organic compound. If both VOC and SVOC are analyzed, the highest value must be used unless the QC criteria for one of the analyses is not met. In such cases, the value from the analysis meeting the QC criteria must be used.

⁶ The sum of individual phthalate compounds(not including the #34, Bis (2-Ethylhexyl) Phthalate . The compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI.

Total values calculated for reporting on NOIs and discharge monitoring reports shall be calculated by adding the measured concentration of each constituent. If the measurement of a constituent is less than the ML, the permittee shall use a value of zero for that constituent. For each test, the permittee shall also attach the raw data for each constituent to the discharge monitoring report, including the minimum level and minimum detection level for the analysis.

⁷ Although the maximum value for the individual PAH compounds is 0.0038 ug/l, the compliance limits are equal to the minimum level (ML) of the test method used as listed in Appendix VI.

⁸ In the November 2002 WQC, EPA has revised the definition of Total PCBs for aquatic life as total PCBs is the sum of all homologue, all isomer, all congener, or all "Oroclor analyses."Total values calculated for reporting on NOIs and discharge monitoring reports shall be calculated by adding the measured concentration of each constituent. If the measure of a constituent is less than the ML, the permittee shall use a value of zero for that constituent. For each test, the permittee shall also attach the raw data for each constituent to the discharge monitoring report, including the minimum level and minimum detection level for the analysis.

⁹Although the maximum value for total PCBs is 0.000064 ug/l, the compliance limit is equal to the minimum level (ML) of the test method used as listed in Appendix VI (i.e., 0.5 ug/l for Method 608 or 0.00005 ug/l when Method 1668a is approved).

¹⁰ Hardness. Cadmium, Chromium III, Copper, Lead, Nickel, Silver, and Zinc are Hardness Dependent.

¹¹ For a Dilution Factor (DF) from 1 to 5, metals limits are calculated using DF times the base limit for the metal. See Appendix IV. For example, iron limits are calculated using $DF \times 1,000 \text{ ug/L}$ (the iron base limit). Therefore DF is 1.5, the iron limit will be 1,500 ug/L; DF 2, then iron limit = $1,000 \times 2 = 2,000 \text{ ug/L}$, etc. not to exceed the DF=5.

¹² Minimum Level (ML) is the lowest level at which the analytical system gives a recognizable signal and acceptable calibration point for the analyte. The ML represents the lowest concentration at which an analyte can be measured with a known level of confidence. The ML is calculated by multiplying the laboratory-determined method detection limit by 3.18 (see 40 CFR Part 136, Appendix B).

¹³ pH sampling for compliance with permit limits may be performed using field methods as provided for in EPA test Method 150.1.

¹⁴ Temperature sampling per Method 170.1



October 18, 2010

United States Environmental Protection Agency
EPA - Region I
Attn: Remediation General Permit NOI Processing
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, Massachusetts 02109-3912

Re: Remediation General Permit - Notice of Intent
CITGO Terminal/BELD
385 Quincy Avenue
Braintree, MA 02184
Norfolk County
NPDES Permit # MAG 910106

Dear Sir or Madam:

Environmental Strategies and Management (ES&M), on behalf of CITGO Petroleum Corporation (CITGO), is pleased to submit this National Pollution Discharge Elimination System (NPDES) Remediation General Permit (RGP) Notice of Intent (NOI) for the discharge of treated groundwater originating from MCP remediation activities at the above referenced location (the "Site").

This NOI has been completed and has included a review of all literature pertaining to the Areas of Critical Environmental Concern (ACEC), Endangered Species Act (ESA), and the National Historic Preservation Act (NHPA). This review is documented below:

- Review of Appendix I "Areas of Critical Environment Concern (June 2009), found that there is one ACEC location in the City of Braintree, MA described as the Cranberry Brook Watershed. The CITGO Terminal/BELD discharge is not within this ACEC and was confirmed through electronic correspondence with the Massachusetts Department of Conservation and Recreation. This correspondence is attached.
- An electronic review of the United States Fish and Wildlife Service resulted in an official documentation demonstrating there are no endangered species located in the area of the CITGO Terminal/BELD discharge. There is however Massachusetts-listed threatened and endangered species in Braintree, but a review of the 13th edition of the Massachusetts Natural Heritage Atlas (dated October 1, 2008) shows that the Site is not located within a NHESP Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife area. Therefore, permit eligibility meets "Criterion A." Documentation corresponding to the Federally-listed and Massachusetts-listed endangered species list is attached.
- An electronic review of the Massachusetts Cultural Resource Information System database, made available through the Massachusetts Historical Commission, found that no area, building, burial ground, object, or structure is located on the property located at 385 Quincy Avenue, the Site, or near the discharge into the Weymouth-Fore River. This

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

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

a) Name of facility/site: <u>CITGO Terminal / BELD</u>		Facility/site mailing address:	
Location of facility/site: longitude: <u>70° 58' 08" W</u> latitude: <u>42° 14' 02" N</u>		Street: <u>385 Quincy Avenue</u>	
b) Name of facility/site owner:		Town: <u>Braintree</u>	
Email address of facility/site owner: <u>DGciffin@citgo.com</u>		State: <u>MA</u>	County: <u>Norfolk</u>
Telephone no. of facility/site owner: <u>856 - 963 - 1251</u>		Zip: <u>02184</u>	
Fax no. of facility/site owner: <u>856 - 963 - 2587</u>		Owner is (check one): 1. Federal ☐ 2. State/Tribal ☐	
Address of owner (if different from site):		3. Private ☒ 4. Other ☐ if so, describe:	
Street: <u>P.O. Box 655</u>			
Town: <u>Pennsauken</u>	State: <u>NJ</u>	Zip: <u>08110</u>	County: <u>Camden</u>
c) Legal name of operator: <u>Environmental Strategies and Management</u>		Operator telephone no.: <u>508 - 226 - 1800</u>	
Operator contact name and title: <u>Joseph Callahan, Project Manager</u>		Operator fax no.: <u>508 - 226 - 1811</u> Operator email: <u>jcallahan@esm-inc.com</u>	
Address of operator (if different from owner):		Street: <u>273 West Main Street</u>	
Town: <u>Norston</u>	State: <u>MA</u>	Zip: <u>02766</u>	County: <u>Bristol</u>

d) Check Y for "yes" or N for "no" for the following:

1. Has a prior NPDES permit exclusion been granted for the discharge? Y ☒ N ☐ MA 041 - 110

2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Y ☐ N ☒ if Y, date and tracking #: _____

3. Is the discharge a "new discharge" as defined by 40 CFR 122.2? Y ☐ N ☒

4. For sites in Massachusetts, is the discharge covered under the Massachusetts Contingency Plan (MCP) and exempt from state permitting? Y ☒ N ☐

e) Is site/facility subject to any State permitting, license, or other action which is causing the generation of discharge? Y ☐ N ☒ If Y, 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 General Permit? Y ☐ N ☒ if Y, number: _____

2. Final Dewatering General Permit? Y ☐ N ☒ if Y, number: _____

3. EPA Construction General Permit? Y ☐ N ☒ if Y, number: _____

4. Individual NPDES permit? Y ☒ N ☐ if Y, number: MA0004782

5. any other water quality related individual or general permit? Y ☐ N ☒ if Y, number: _____

g) Is the site/facility located within or does it discharge to an Area of Critical Environmental Concern (ACEC)? Y ☐ N ☒ (with the exception of MA0910106)

h) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls.

Activity Category	Activity Sub-Category
I - Petroleum Related Site Remediation	A. Gasoline Only Sites ☐ B. Fuel Oils and Other Oil Sites (including Residential Non-Business Remediation Discharges) ☒ C. Petroleum Sites with Additional Contamination ☐ A. Volatile Organic Compound (VOC) Only Sites ☐ B. VOC Sites with Additional Contamination ☐ C. Primarily Heavy Metal Sites ☐ A. General Urban Fill Sites ☐ B. Known Contaminated Sites ☐
II - Non Petroleum Site Remediation	
III - Contaminated Construction Dewatering	

IV - Miscellaneous Related Discharges	A. Aquifer Pump Testing to Evaluate Formerly Contaminated Sites ☐ B. Well Development/Rehabilitation at Contaminated/Formerly Contaminated Sites ☐ C. Hydrostatic Testing of Pipelines and Tanks ☐ D. Long-Term Remediation of Contaminated Sumps and Dikes ☐ E. Short-term Contaminated Dredging Drain Back Waters (if not covered by 401/404 permit) ☐
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2. Discharge information. Please provide information about the discharge, (attaching additional sheets as necessary) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage: <u>Treated effluent water from an MCP related remediation system</u>																					
b) Provide the following information about each discharge:																					
1) Number of discharge points: <u>1</u>	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)? Max. flow <u>0.067</u> Is maximum flow a design value? Y ☒ N ☐ Average flow (include units) <u>0.018 cfs</u> Is average flow a design value or estimate? <u>True Value</u>																				
3) Latitude and longitude of each discharge within 100 feet: <table border="1"> <tr> <td>pt.1: lat. <u>42° 14' 08" N</u></td> <td>long <u>70° 58' 04" W</u></td> <td>pt.2: lat. <u>long</u></td> <td><u>long</u></td> </tr> <tr> <td>pt.3: lat. <u>long</u></td> <td><u>long</u></td> <td>pt.4: lat. <u>long</u></td> <td><u>long</u></td> </tr> <tr> <td>pt.5: lat. <u>long</u></td> <td><u>long</u></td> <td>pt.6: lat. <u>long</u></td> <td><u>long</u></td> </tr> <tr> <td>pt.7: lat. <u>long</u></td> <td><u>long</u></td> <td>pt.8: lat. <u>long</u></td> <td><u>long</u></td> </tr> <tr> <td></td> <td></td> <td></td> <td>etc.</td> </tr> </table>		pt.1: lat. <u>42° 14' 08" N</u>	long <u>70° 58' 04" W</u>	pt.2: lat. <u>long</u>	<u>long</u>	pt.3: lat. <u>long</u>	<u>long</u>	pt.4: lat. <u>long</u>	<u>long</u>	pt.5: lat. <u>long</u>	<u>long</u>	pt.6: lat. <u>long</u>	<u>long</u>	pt.7: lat. <u>long</u>	<u>long</u>	pt.8: lat. <u>long</u>	<u>long</u>				etc.
pt.1: lat. <u>42° 14' 08" N</u>	long <u>70° 58' 04" W</u>	pt.2: lat. <u>long</u>	<u>long</u>																		
pt.3: lat. <u>long</u>	<u>long</u>	pt.4: lat. <u>long</u>	<u>long</u>																		
pt.5: lat. <u>long</u>	<u>long</u>	pt.6: lat. <u>long</u>	<u>long</u>																		
pt.7: lat. <u>long</u>	<u>long</u>	pt.8: lat. <u>long</u>	<u>long</u>																		
			etc.																		
4) If hydrostatic testing, total volume of the discharge (gals) <u>N/A</u>	5) Is the discharge intermittent ☐ or seasonal ☐ ? Is discharge ongoing? Y ☒ N ☐																				
c) Expected dates of discharge (mm/dd/yy): start <u>03/01/2005</u> end <u>12/31/2015</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) <u>See attachment</u>																					

3. Contaminant information.

a) Based on the sub-category selected (see Appendix III), indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (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)
1. Total Suspended Solids (TSS)		☐	☐	NA							
2. Total Residual Chlorine (TRC)		☐	☐	NA							
3. Total Petroleum Hydrocarbons (TPH)		☐	☒	1	Grab	8100M	1000 ug/l	12,000			
4. Cyanide (CN)	57125	☐	☐	NA							
5. Benzene (B)	71432	☐	☒	1	Grab	8260B	2 ug/l	8			
6. Toluene (T)	108883	☐	☒	1	Grab	8260B	2 ug/l	3			
7. Ethylbenzene (E)	100414	☐	☒	1	Grab	8260B	2 ug/l	2			
8. (m,p,o) Xylenes (X)	108883; 106423; 95476; 1330207	☐	☒	1	Grab	8260B	2 ug/l	10			
9. Total BTEX ²	n/a	☐	☒	1	Grab	8260B	2 ug/l	23			
10. Ethylene Dibromide (EDB) (1,2-Dibromoethane) ³	106934	☐	☐	NA							
11. Methyl-tert-Butyl Ether (MTBE)	1634044	☐	☐	NA							
12. tert-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	☐	☐	NA							

* Numbering system is provided to allow cross-referencing to Effluent Limits and Monitoring Requirements by Sub-Category included in Appendix III, as well as the Test Methods and Minimum Levels associated with each parameter provided in Appendix VI.

² BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

³ EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value concentration (ug/l) mass (kg)	Average daily value concentration (ug/l) mass (kg)
13. tert-Amyl Methyl Ether (TAME)	9940508	☐	☐	NA					
14. Naphthalene	91203	☒	☐	1	6 grab	8270D	0.5-4g/l	ND	
15. Carbon Tetrachloride	56235	☐	☐	NA					
16. 1,2 Dichlorobenzene (o-DCB)	95501	☐	☐	NA					
17. 1,3 Dichlorobenzene (m-DCB)	541731	☐	☐	NA					
18. 1,4 Dichlorobenzene (p-DCB)	106467	☐	☐	NA					
18a. Total dichlorobenzene		☐	☐	NA					
19. 1,1 Dichloroethane (DCA)	75343	☐	☐	NA					
20. 1,2 Dichloroethane (DCA)	107062	☐	☐	NA					
21. 1,1 Dichloroethene (DCE)	75354	☐	☐	NA					
22. cis-1,2 Dichloroethene (DCE)	156592	☐	☐	NA					
23. Methylene Chloride	75092	☐	☐	NA					
24. Tetrachloroethene (PCE)	127184	☐	☐	NA					
25. 1,1,1 Trichloro-ethane (TCA)	71556	☐	☐	NA					
26. 1,1,2 Trichloro-ethane (TCA)	79005	☐	☐	NA					
27. Trichloroethene (TCE)	79016	☐	☐	NA					

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (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)
28. Vinyl Chloride (Chloroethene)	75014	☐	☐	NA							
29. Acetone	67641	☒	☐	1	Grab	8260B	50 ug/l	ND			
30. 1,4 Dioxane	123911	☐	☐	NA							
31. Total Phenols	108952	☐	☐	NA							
32. Pentachlorophenol (PCP)	87865	☐	☐	NA							
33. Total Phthalates (Phthalate esters) ⁴		☐	☐	NA							
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	117817	☐	☐	NA							
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		☒	☐	1	Grab	8270D	0.2 ug/l	ND			
a. Benzo(a) Anthracene	56553	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
b. Benzo(a) Pyrene	50328	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
c. Benzo(b) Fluoranthene	205992	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
d. Benzo(k) Fluoranthene	207089	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
e. Chrysene	21801	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
f. Dibenzo(a,h)anthracene	53703	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
g. Indeno(1,2,3-cd) Pyrene	193395	☒	☐	1	Grab	8270D	0.2 ug/l	ND			
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		☐	☒	1	Grab	8270D	0.5 ug/l	12.0			

⁴ The sum of individual phthalate compounds.

Parameter	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value concentration (ug/l) mass (kg)	Average daily value concentration (ug/l) mass (kg)
h. Acenaphthene	83329	☐	☒	1	Grab	8270D	0.5 ug/l	3.3	
i. Acenaphthylene	208968	☐	☒	1	Grab	8270D	0.5 ug/l	0.6	
j. Anthracene	120127	☒	☐	1	Grab	8270D	0.5 ug/l	ND	
k. Benzo(ghi) Perylene	191242	☒	☐	1	Grab	8270D	0.5 ug/l	ND	
l. Fluoranthene	206440	☒	☐	1	Grab	8270D	0.5 ug/l	ND	
m. Fluorene	86737	☐	☒	1	Grab	8270D	0.5 ug/l	ND	
n. Naphthalene	91203	☒	☐	1	Grab	8270D	0.5 ug/l	4.3	
o. Phenanthrene	85018	☐	☒	1	Grab	8270D	0.5 ug/l	ND	
p. Pyrene	129000	☐	☒	1	Grab	8270D	0.5 ug/l	2.1	
	85687; 84742; 117840; 84662; 131113; 117817.	☐	☒	1	Grab	8270D	0.5 ug/l	1.7	
37. Total Polychlorinated Biphenyls (PCBs)		☐	☐	NA					
38. Chloride	16887006	☐	☒	1	Grab	EPA 300.0A 8270B	5,000 ug/l	870,000	
39. Antimony	7440360	☐	☐	NA					
40. Arsenic	7440382	☐	☐	NA					
41. Cadmium	7440439	☐	☐	NA					
42. Chromium III (trivalent)	16065831	☒	☐	1	Grab	SM3500 Cr-B-Calc	50 ug/l	ND	
43. Chromium VI (hexavalent)	18540299	☒	☐	1	Grab	SM3500 Cr-B	10 ug/l	10	
44. Copper	7440508	☐	☐	NA					
45. Lead	7439921	☐	☐	NA					
46. Mercury	7439976	☐	☐	NA					
47. Nickel	7440020	☒	☐	1	Grab	6010B	20 ug/l	ND	
48. Selenium	7782492	☐	☐	NA					
49. Silver	7440224	☐	☐	NA					
50. Zinc	7440666	☐	☒	1	Grab	6010B	20 ug/l	50	
51. Iron	7439896	☐	☒	1	Grab	6010B	50 ug/l	10,000	
Other (describe):		☐	☐	NA					

Parameter *	CAS Number	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value concentration (ug/l)	Maximum daily value mass (kg)	Average daily value concentration (ug/l)	Average daily value mass (kg)
		☐	☐								
		☐	☐								

b) For discharges where metals are believed present, please fill out the following (attach results of any calculations):

<i>Step 1:</i> Do any of the metals in the influent exceed the effluent limits in Appendix III (i.e., the limits set at zero dilution)? Y ☒ N ☐		If yes, which metals? <u>Iron</u>
<i>Step 2:</i> For any metals which 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? Metal: <u>Iron</u> DF: <u>19.21</u> Metal: _____ DF: _____ Metal: _____ DF: _____ Metal: _____ DF: _____ Etc.		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 Y, list which metals: <u>Iron</u>

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:

Contaminated groundwater from Seven(7) to ten(10) recovery wells are pumped to the treatment system where it is treated by oil/water separation, filtration and granulated activated carbon prior to discharge. See "Piping and Instrumentation Diagram" attachment.

b) Identify each applicable treatment unit (check all that apply):

Frac. tank ☐	Air stripper ☐	Oil/water separator ☒	Equalization tanks ☐	Bag filter ☒	GAC filter ☒
Chlorination ☐	De-chlorination ☐	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 8.0 gpm Maximum flow rate of treatment system 30 gpm
Design flow rate of treatment system 30 gpm

d) A description of chemical additives being used or planned to be used (attach MSDS sheets):
No chemical additives are being used

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

a) Identify the discharge pathway:	Direct to receiving water ☒	Within facility (sewer) ☐	Storm drain ☐	Wetlands ☐	Other (describe):
------------------------------------	---	--	--------------------------------------	-----------------------------------	--

b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:
Treated effluent water travels through PVC Piping to the Weymouth - Fox River (see attachment)

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 B

e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 1.22 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? Y ☒ N ☐ If yes, for which pollutant(s)? Pathogens

Is there a final TMDL? Y ☐ N ☒ If yes, for which pollutant(s)?

6. ESA and NHPA Eligibility.

Please provide the following information according to requirements of Permit Parts I.A.4 and I.A.5 Appendices II and VII.

a) Using the instructions in Appendix VII and information on Appendix II, under which criterion listed in Part I.C are you eligible for coverage under this general permit?

A ☒ B ☐ C ☐ D ☐ E ☐ F ☐

b) If you selected Criterion D or F, has consultation with the federal services been completed? Y ☐ N ☐ Underway ☐

c) If consultation with U.S. Fish and Wildlife Service and/or NOAA Fisheries Service was completed, was a written concurrence finding that the discharge is "not likely to adversely affect" listed species or critical habitat received? Y ☐ N ☐

d) Attach documentation of ESA eligibility as described in the NOI instructions and required by Appendix VII, Part I.C, Step 4.

e) Using the instructions in Appendix VII, under which criterion listed in Part II.C are you eligible for coverage under this general permit?

1 ☒ 2 ☐ 3 ☐

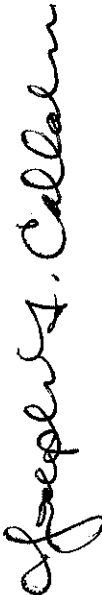
f) If Criterion 3 was selected, attach all written correspondence with the State or Tribal historic preservation officers, including any terms and conditions that outline measures the applicant must follow to mitigate or prevent adverse effects due to activities regulated by the RGP.

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.

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:	CITGO Terminal / BELD
Operator signature:	
Printed Name & Title:	JOSEPH L. CALLAHAN PROJECT MANAGER
Date:	12/25/2010

Laboratory Report

Resource Laboratories, LLC

124 Heritage Avenue #10 Portsmouth, NH 03801

Joe Callahan

Environmental Strategies & Management

273 West Main Street

Norton, MA 02766

PO Number: None

Job ID: 19902

Date Received: 9/2/10

Project: BELD 2010-003

Attached please find results for the analysis of the samples received on the date referenced above.

Unless otherwise noted in the attached report, the analyses performed met the requirements of Resource Laboratories, LLC Quality Assurance Plan. The Standard Operating Procedures (SOP) are based upon USEPA SW-846, USEPA Methods for Chemical Analysis of Water and Wastewater, Standard Methods for the Examination of Water and Wastewater and other recognized methodologies. The results contained in this report pertain only to the samples as indicated on the chain of custody.

Resource Laboratories, LLC maintains certification with the agencies listed below.

We appreciate the opportunity to provide laboratory services. If you have any questions regarding the enclosed report, please contact the laboratory and we will be glad to assist you.

Sincerely,

Resource Laboratories, LLC

 (for)

Sue Sylvester

Principal, General Manager

Date of Approval: 9/9/2010

Total number of pages: 7

Resource Laboratories, LLC Certifications

New Hampshire 1732
Maine NH903

Massachusetts M-NH902

RL Resource Laboratories, LLC

Voice: 603-436-2001 Fax: 603-430-2100

www.reslabs.com

Project ID: BELD 2010-003

Job ID: 19902

Sample#: 19902-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/2/10 9:50

Parameter	Result	Quant Limit	Units	Instr Dil'n		Analyst	Prep Date	Analysis			Reference
				Factor				Batch	Date	Time	
benzene	8	2	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
toluene	3	2	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
ethylbenzene	2	2	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
m&p-xylenes	8	2	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
o-xylene	2	2	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
naphthalene	< 5	5	ug/L	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
Surrogate Recovery		Limits									
dibromofluoromethane SUR	98	78-114	%	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
toluene-D8 SUR	105	88-110	%	1		LMM		1001959	9/2/10	20:43	SW5030B8260B
4-bromofluorobenzene SUR	98	86-115	%	1		LMM		1001959	9/2/10	20:43	SW5030B8260B

Sample#: 19902-002

Sample ID: CT 1 EFF

Matrix: Water

Sampled: 9/2/10 10:00

Parameter	Result	Quant Limit	Units	Instr Dil'n		Analyst	Prep Date	Analysis			Reference
				Factor				Batch	Date	Time	
benzene	< 2	2	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
toluene	< 2	2	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
ethylbenzene	< 2	2	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
m&p-xylenes	< 2	2	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
o-xylene	< 2	2	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
naphthalene	< 5	5	ug/L	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
Surrogate Recovery		Limits									
dibromofluoromethane SUR	97	78-114	%	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
toluene-D8 SUR	98	88-110	%	1		LMM		1001959	9/2/10	19:41	SW5030B8260B
4-bromofluorobenzene SUR	96	86-115	%	1		LMM		1001959	9/2/10	19:41	SW5030B8260B

Project ID: BELD 2010-003

Job ID: 19902

Sample#: 19902-004

Sample ID: Trip Blank

Matrix: Water

Sampled: 9/2/10

Parameter	Result	Quant	Instr Dil'n		Analyst	Prep Date	Analysis			Reference
		Limit	Units	Factor			Batch	Date	Time	
benzene	< 2	2	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
toluene	< 2	2	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
ethylbenzene	< 2	2	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
m&p-xylenes	< 2	2	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
o-xylene	< 2	2	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
naphthalene	< 5	5	ug/L	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
Surrogate Recovery		Limits								
dibromofluoromethane SUR	98	78-114	%	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
toluene-D8 SUR	99	88-110	%	1	LMM		1001959	9/2/10	18:07	SW5030B8260B
4-bromofluorobenzene SUR	94	86-115	%	1	LMM		1001959	9/2/10	18:07	SW5030B8260B

Project ID: BELD 2010-003

Job ID: 19902

Sample#: 19902-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/2/10 9:50

Sampled: 9/2/10 9:50		Quant	Instr Dil'n		Prep	Analysis				
Parameter	Result	Limit	Units	Factor	Analyst	Date	Batch	Date	Time	Reference
naphthalene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
2-methylnaphthalene	2.7	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
acenaphthylene	0.6	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
acenaphthene	3.3	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
fluorene	4.3	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
phenanthrene	2.1	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
anthracene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
fluoranthene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
pyrene	1.7	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
benzo(g,h,i)perylene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
Surrogate Recovery	Limits									
2-fluorobiphenyl SUR	66	43-116	%	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D
o-terphenyl SUR	68	33-141	%	1	AJD	9/3/10	3576	9/8/10	8:02	SW3510C8270D

Sample#: 19902-002

Sample ID: CT 1 EFF

Matrix: Water

Sampled: 9/2/10 10:00

Sampled: 9/2/10 10:00		Quant		Instr Dil'n		Prep		Analysis		
Parameter	Result	Limit	Units	Factor	Analyst	Date	Batch	Date	Time	Reference
naphthalene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
2-methylnaphthalene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
acenaphthylene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
acenaphthene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
fluorene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
phenanthrene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
anthracene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
fluoranthene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
pyrene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
benzo(g,h,i)perylene	< 0.5	0.5	ug/L	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
Surrogate Recovery	Limits									
2-fluorobiphenyl SUR	80	43-116	%	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D
o-terphenyl SUR	81	33-141	%	1	AJD	9/3/10	3576	9/7/10	13:38	SW3510C8270D

Project ID: BELD 2010-003

Job ID: 19902

Sample#: 19902-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/2/10 9:50

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Analysis			Reference
							Batch	Date	Time	
TPH C10-C36	12000	1000	ug/L	5	JLZ	9/3/10	3577	9/7/10	13:05	SW3510C8100M
Surrogate Recovery		Limits								
2-fluorobiphenyl SUR	81	40-140	%	5	JLZ	9/3/10	3577	9/7/10	13:05	SW3510C8100M
o-terphenyl SUR	75	40-140	%	5	JLZ	9/3/10	3577	9/7/10	13:05	SW3510C8100M

Sample#: 19902-002

Sample ID: CT 1 EFF

Matrix: Water

Sampled: 9/2/10 10:00

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Analysis			Reference
							Batch	Date	Time	
TPH C10-C36	< 200	200	ug/L	1	JLZ	9/3/10	3577	9/7/10	11:43	SW3510C8100M
Surrogate Recovery		Limits								
2-fluorobiphenyl SUR	72	40-140	%	1	JLZ	9/3/10	3577	9/7/10	11:43	SW3510C8100M
o-terphenyl SUR	80	40-140	%	1	JLZ	9/3/10	3577	9/7/10	11:43	SW3510C8100M

Resource Laboratories, LLC

124 Heritage Avenue • Portsmouth, NH 03801
Phone: 603-436-2001 • Fax: 603-430-2100

CHAIN-OF-CUSTODY RE
AND ANALYSIS REQUEST 19902

PAGE 1 OF 2

Company Name:

ESM

Project Name: BEU

Company Address:

273 W. Main St, Norton

Project #: 2010-003

Project Location: NH MAINE VT

Report To:

J. Callahan

Protocol: RCRA SDWA NHDES OTHER

Reporting Limits: GAP GW-1 S-1 EPA DW Other

Phone #:

Quote #

508-226-1800

PO #

Invoice To:

PO #

J. Callahan

Quote #

508-226-1800

PO #

J. Callahan

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508-226-1800

PO #

J. Callahan

Quote #

RL

Resource Laboratories, LLC
124 Heritage Avenue • Portsmouth, NH 03801
Phone: 603-436-2001 • Fax: 603-430-2100

CHAIN-OF-CUSTODY RECORD
AND ANALYSIS REQUEST

19902

PAGE 2 OF 2

Company Name:

ESM

Project Name: BCU

Company Address:

213 W. Main St, Norton

Project #: 2010-003

Project Location: NH MA ME VT

Report To:

J. Callahan

Protocol: RCRA SDWA NHDES OTHER

Reporting: CAPP GW-1 S-1

Limits: EPA DW Other

Phone #:

508-226-1850

Quote #

PO #

NH GREE/ODD

Fund Pricing

Lab Sample ID	Field ID	# CONTAINERS	Matrix			Preservation Method						Sampling	
			WATER	SOLID	OTHER	HCl	HNO ₃	H ₂ SO ₄	NaOH	MeOH	OTHER (Specify)	DATE	TIME

☐ VOC 8260	☐ VOC 8260 NHDES	☐ VOC 8260 MADEP
☐ VOC 624	☐ VOC BTEX	☐ MIBE, only
☐ VOC 8021VT	☐ VPH MADEP	☐ MEGRO
☐ GRO 8015	☐ VOC 524.2	☐ VOC 524.2 NH List
☐ TPH	☐ DRO 8015	☐ MEDRO
☐ EPH MADEP	☐ TPH Fingerprint	☒ 8270PAH
☐ 8270ABN	☐ 625	☐ EDB 504.1
☐ 8082 PCB	☐ 8081 Pesticides	☐ 608 Pest/PCB
☐ O&G 1564	☐ Mineral O&G SM5520F	☐ pH
☐ BOD	☐ Conductivity	☐ Turbidity
☐ TSS	☐ TDS	☐ TS
☐ TVS	☐ Alkalinity	☐ RCRA Metals
☐ Priority Pollutant Metals	☐ TAL Metals	☐ Total Metals-list:
☐ Dissolved Metals-list:	☐ Ammonia	☐ COD
☐ TKN	☐ TN	☐ TON
☐ T-Phosphorus	☐ Phenols	☐ Bacteria P/A
☐ Bacteria MPN	☐ Cyanide	☐ Sulfide
☐ Nitrate + Nitrite	☐ Ortho P	☐ Nitrate
☐ Nitrite	☐ Chloride	☐ Sulfate
☐ Bromide	☐ Fluoride	☐ Corrosivity
☐ Reactive CN	☐ Reactive S-	☐ Ignitibility/FP
☐ TCLP Metals	☐ TCLP VOC	☐ TCLP SVOC
☐ TCLP Pesticide	☐ Subcontract:	☐ TOC
☐ Grain Size	☐ TCLP Herbicides	☐ VOC 8260 BTEX + Naphthalene
☐ TPH 8100		

Grab (G) or Composite (C)

TAT REQUESTED

Priority (24 hr)**

Expedited (48 hr)**

Standard (10 Business Days)

**Date Needed

hours

* See www.reslabs.com for sample acceptance policy and current accreditation lists.

SPECIAL INSTRUCTIONS: HOLD pending authorization from ESM to analyze per T. Sylvia memo cancelled per Joe C. 9/9/12

REPORTING INSTRUCTIONS

☐ HARD COPY REQUIRED

☒ FAX (FAX# 508-226-1850)

☐ PDF (e-mail address)

OTHER (specify)

Relinquished by Sampler:

Relinquished by:

Relinquished by:

Date

Time

Date

Time

Date

Time

Received by:

Received by:

Received by:

Received by:

Received by:

Received by:

RECEIVED ON ICE

TEMPERATURE

YES

NO

DATE

TIME

CUSTODY RECORD

ANALYSIS REQUEST

Laboratory Report

Resource Laboratories, LLC

124 Heritage Avenue #10 Portsmouth, NH 03801

Joe Callahan

Environmental Strategies & Management

273 West Main Street

Norton, MA 02766

PO Number: None

Job ID: 19903

Date Received: 9/2/10

Project: BELD 2010-003

Attached please find results for the analysis of the samples received on the date referenced above.

Unless otherwise noted in the attached report, the analyses performed met the requirements of Resource Laboratories, LLC Quality Assurance Plan. The Standard Operating Procedures (SOP) are based upon USEPA SW-846, USEPA Methods for Chemical Analysis of Water and Wastewater, Standard Methods for the Examination of Water and Wastewater and other recognized methodologies. The results contained in this report pertain only to the samples as indicated on the chain of custody.

Resource Laboratories, LLC maintains certification with the agencies listed below.

We appreciate the opportunity to provide laboratory services. If you have any questions regarding the enclosed report, please contact the laboratory and we will be glad to assist you.

Sincerely,

Resource Laboratories, LLC

 (for)

Sue Sylvester

Principal, General Manager

Date of Approval: 9/9/2010

Total number of pages: 4

Resource Laboratories, LLC Certifications

New Hampshire 1732
Maine NH903

Massachusetts M-NH902

RL Resource Laboratories, LLC

Voice: 603-436-2001 Fax: 603-430-2100

www.reslabs.com

Project ID: BELD 2010-003

Job ID: 19903

Sample#: 19903-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/2/10 9:50

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
Iron	10	0.05	mg/L	1	BJS	9/8/10	3583	9/8/10	11:12	SW3005A6010B

Sample#: 19903-002

Sample ID: CT 1 EFF

Matrix: Water

Sampled: 9/2/10 10:00

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
Iron	0.10	0.05	mg/L	1	BJS	9/8/10	3583	9/8/10	11:07	SW3005A6010B

Resource Laboratories, LLC
124 Heritage Avenue • Portsmouth, NH 03801
Phone: 603-436-2001 • Fax: 603-430-2100

**CHAIN-OF-CUSTODY RECORD
AND ANALYSIS REQUEST**

19903

PAGE 1 OF 2

Company Name:

ESM

Project Name: BCU

Company Address:

273 W. Main St, Norton

Project #: 2010-003

Project Location: NH MA ME VT

Report To: J. Callahan

Protocol: RCRA SDWA NPDES MCP NHDES OTHER

Phone #:

508.226.1850

Reporting Limits: QAPP GW-1 S-1 EPA DW Other

Invoice To:

J. Callahan

Quote # _____ Fund Pricing PO # _____

Lab Sample ID

(Lab Use Only)

Field ID

CONTAINERS

Matrix

Preservation Method

Sampling

- ☐ VOC 8260 ☐ VOC 8260 NHDES ☐ VOC 8260 MADEP
☐ VOC 624 ☐ VOC BTEX ☐ MIBK, only ☐ VOC 8021VT
☐ VPH MADEP ☐ MEGRO ☐ GRO 8015
☐ VOC 524.2 ☐ VOC 524.2 NH List
☐ TPH ☐ DRO 8015 ☐ MEDRO ☐ EPH MADEP ☐ TPH Fingerprint
☐ 8270PAH ☐ 8270ABN ☐ 625 ☐ EDB 504.1
☐ 8082 PCB ☐ 8081 Pesticides ☐ 608 Pest/PCB
☐ O&G 1664 ☐ Mineral O&G SM5520F
☐ pH ☐ BOD ☐ Conductivity ☐ Turbidity
☐ TSS ☐ TDS ☐ TS ☐ TVS ☐ Alkalinity
☐ RCRA Metals ☐ Priority Pollutant Metals ☐ TAL Metals
☐ Total Metals-list:
☐ Dissolved Metals-list:
☐ Ammonia ☐ COD ☐ TKN ☐ TN ☐ TON
☐ T-Phosphorus ☐ Phenols ☐ Bacteria P/A ☐ Bacteria MPN
☐ Cyanide ☐ Sulfide ☐ Nitrate + Nitrite ☐ Ortho P
☐ Nitrate ☐ Nitrite ☐ Chloride ☐ Sulfate ☐ Bromide ☐ Fluoride
☐ Corrosivity ☐ Reactive CN ☐ Reactive S- ☐ Ignitability/FP
☐ TCLP Metals ☐ TCLP VOC ☐ TCLP SVOC ☐ TCLP Pesticide
Subcontract: ☐ TOC ☐ Grain Size ☐ TCLP Herbicides

Total Fe 6010B

Grab (G) or Composite (C)

TAT REQUESTED

Priority (24 hr)**

Expedited (48 hr)**

Standard (10 Business Days)

**Date Needed

* See www.reslabs.com for sample acceptance policy and current accreditation lists.

REPORTING INSTRUCTIONS ☐ PDF (e-mail address)

☐ HARD COPY REQUIRED

☒ FAX (FAX# 508.226.1811)

☐ OTHER (specify)

Relinquished by Sampler:

Relinquished by:

CUSTODY RECORD

SPECIAL INSTRUCTIONS * Run CT1 EFF @ 48 hrs TAT & rpt. to ESM

RECEIVED ON ICE YES ☐ NO ☐ TEMPERATURE 10 °C

Date

Time

Date

Time

Date

Time

Resource Laboratories, LLC

124 Heritage Avenue • Portsmouth, NH 03801
Phone: 603-436-2001 • Fax: 603-430-2100

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

19903

Company Name:

ESM

Project Name: BCU

Company Address:

230 Main St, Norton

Project #: 2010003

Project Location: NH MA ME VT

Other

Report To:

J. Callahan

Protocol:

RCRA SDWA NHDES MCP NHDES OTHER

Phone #:

508-226-1800

Reporting

QAPP GW-1 S-1 EPA DW Other

Invoice To:

J. Callahan

Quote #

NH GRE/ODD Fund Pricing

PO #

Lab Sample ID

(Lab Use Only)

Field ID

CONTAINERS

Matrix

Preservation Method

Sampling

DATE

TIME

SAMPLER*

WATER

SOLID

OTHER

HCl

HNO₃

H₂SO₄

NaOH

MeOH

OTHER (Specify)

1

X

9/2/10

1010

144

Laboratory Report

Resource Laboratories, LLC

124 Heritage Avenue #10 Portsmouth, NH 03801

Joe Callahan
Environmental Strategies & Management
273 West Main Street
Norton, MA 02766

PO Number: None
Job ID: 20052
Date Received: 9/27/10

Project: Beld 2010-003

Attached please find results for the analysis of the samples received on the date referenced above.

Unless otherwise noted in the attached report, the analyses performed met the requirements of Resource Laboratories, LLC Quality Assurance Plan. The Standard Operating Procedures (SOP) are based upon USEPA SW-846, USEPA Methods for Chemical Analysis of Water and Wastewater, Standard Methods for the Examination of Water and Wastewater and other recognized methodologies. The results contained in this report pertain only to the samples as indicated on the chain of custody.

Resource Laboratories, LLC maintains certification with the agencies listed below.

We appreciate the opportunity to provide laboratory services. If you have any questions regarding the enclosed report, please contact the laboratory and we will be glad to assist you.

Sincerely,
Resource Laboratories, LLC



Sue Sylvester
Principal, General Manager

Date of Approval: 10/8/2010
Total number of pages: 4

Resource Laboratories, LLC Certifications

New Hampshire 1732
Maine NH903

Massachusetts M-NH902

RL Resource Laboratories, LLC

Voice: 603-436-2001 Fax: 603-430-2100
www.reslabs.com

Project ID: Beld 2010-003

Job ID: 20052

Sample#: 20052-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/23/10 9:25

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
acetone	< 50	50	ug/L	1	LMM		1002190	9/30/10	7:15	SW5030B8260B
Surrogate Recovery Limits										
dibromofluoromethane SUR	105	78-114	%	1	LMM		1002190	9/30/10	7:15	SW5030B8260B
toluene-D8 SUR	105	88-110	%	1	LMM		1002190	9/30/10	7:15	SW5030B8260B
4-bromofluorobenzene SUR	97	86-115	%	1	LMM		1002190	9/30/10	7:15	SW5030B8260B

Sample#: 20052-002

Sample ID: Trip Blank

Matrix: Water

Sampled: 9/23/10

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
acetone	< 50	50	ug/L	1	LMM		1002190	9/30/10	4:39	SW5030B8260B
Surrogate Recovery Limits										
dibromofluoromethane SUR	101	78-114	%	1	LMM		1002190	9/30/10	4:39	SW5030B8260B
toluene-D8 SUR	100	88-110	%	1	LMM		1002190	9/30/10	4:39	SW5030B8260B
4-bromofluorobenzene SUR	96	86-115	%	1	LMM		1002190	9/30/10	4:39	SW5030B8260B

Sample#: 20052-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/23/10 9:25

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
benzo(a)anthracene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
chrysene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
benzo(b)fluoranthene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
benzo(k)fluoranthene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
benzo(a)pyrene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
indeno(1,2,3-cd)pyrene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
dibenzo(a,h)anthracene	< 0.2	0.2	ug/L	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
Surrogate Recovery Limits										
2-fluorobiphenyl SUR	59	43-116	%	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D
o-terphenyl SUR	56	33-141	%	1	AJD	9/28/10	3651	9/30/10	19:30	SW3510C8270D

Project ID: Beld 2010-003

Job ID: 20052

Sample#: 20052-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/23/10 9:25

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
Chromium	< 0.05	0.05	mg/L	1	BJS	9/28/10	3650	9/28/10	13:57	SW3005A6010B
Nickel	< 0.02	0.02	mg/L	1	BJS	9/28/10	3650	9/28/10	13:57	SW3005A6010B
Zinc	0.05	0.02	mg/L	1	BJS	9/28/10	3650	9/28/10	13:57	SW3005A6010B

Sample#: 20052-001

Sample ID: CT 1 INF

Matrix: Water

Sampled: 9/23/10 9:25

Parameter	Result	Quant Limit	Units	Instr Dil'n Factor	Analyst	Prep Date	Batch	Analysis Date	Time	Reference
Chloride	270	5.0	mg/L	10			1002228			E300.0A
Chromium, Hexavalent	0.01	0.01	mg/L	1	APA		1002178	9/30/10		SM3500CrB
Chromium, Trivalent	< 0.05	0.05	mg/L	1			1002226			CALC

Resource Laboratories, LLC

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Phone: 603-436-2001 • Fax: 603-430-2100

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

20052

PAGE 1 OF 1

Company Name:

ES+M

Project Name: BED

Company Address:

373 West Main Street, Apt 101, Portsmouth, NH 03801

Project #: 200-003

Project Location: NH MA ME VT

Report To: Joe Callahan

Protocol: RCRA SDWA (NHDES) MCP NHDES OTHER

Phone #:

508-226-1800

Reporting: QAPP GW-1 S-1

Invoice To:

ES+M

Quote # _____ NH GREEODD
Fund Pricing

PO # _____

Lab Sample ID Field ID

CONTAINERS

Matrix: WATER SOLID OTHER

Preservation Method: HCl HNO₃ H₂SO₄ NaOH MeOH OTHER (Specify)

Sampling: DATE TIME SAMPLER*

- ☐ VOC 8260 ☐ VOC 8260 NHDES ☐ VOC 8260 MADEP
- ☐ VOC 624 ☐ VOC BTEX ☐ MIBE, only ☐ VOC 8021VT
- ☐ VPH MADEP ☐ MEGRO ☐ GRO 8015
- ☐ VOC 524.2 ☐ VOC 524.2 NH List
- ☐ TPH ☐ DRO 8015 ☐ MEDRO ☐ EPH MADEP ☐ TPH Fingerprint
- ☒ 8270PAH ☐ 8270ABN ☐ 625 ☐ EDB 504.1 ☐ Group I only
- ☐ 8082 PCB ☐ 8081 Pesticides ☐ 608 Pest/PCB
- ☐ O&G 1664 ☐ Mineral O&G SM5520F
- ☐ pH ☐ BOD ☐ Conductivity ☐ Turbidity
- ☐ TSS ☐ TDS ☐ TS ☐ TVS ☐ Alkalinity
- ☐ RCRA Metals ☐ Priority Pollutant Metals ☐ TAL Metals
- ☒ Total Metals-list: Chromium, Nickel, Zinc only
- ☐ Dissolved Metals-list:
- ☐ Ammonia ☐ COD ☐ TKN ☐ TN ☐ TON
- ☐ T-Phosphorus ☐ Phenols ☐ Bacteria P/A ☐ Bacteria MPN
- ☐ Cyanide ☐ Sulfide ☐ Nitrate + Nitrite ☐ Ortho P
- ☐ Nitrate ☐ Nitrite ☒ Chloride ☐ Sulfate ☐ Bromide ☐ Fluoride
- ☐ Corrosivity ☐ Reactive CN ☐ Reactive S- ☐ Ignitibility/FP
- ☐ TCLP Metals ☐ TCLP VOC ☐ TCLP SVOC ☐ TCLP Pesticide
- Subcontract: ☐ TOC ☐ Grain Size ☐ TCLP Herbicides

Acetone by 8260C
Chromium III (trivalent)
Chromium VI

Grab (G) or Composite (C)

TAI REQUESTED

Priority (24 hr)** ☐
Expedited (48 hr)** ☐
Standard (10 Business Days) ☒

**Date Needed:

* See www.reslabs.com for sample acceptance policy and current accreditation lists.

REPORTING INSTRUCTIONS

☒ PDF (e-mail address) ☐ FAX (FAX#)

Relinquished by: Sample

Relinquished by:

CUSTODY RECORD

Relinquished by:

SPECIAL INSTRUCTIONS: Total PAHs = Group I only!!!
Total Metals = Chromium, Nickel, Zinc only!!!

Joe Callahan, ES+M - INC. COM
Excel (Fluorocarbon - inc. com)

OTHER (specify): Excel (Fluorocarbon - inc. com)

Date: 09/23/2005

Time: 10:00

Date: 09/27/2005

Time: 11:50

Received by:

Joe Callahan

Received by:

Joe Callahan

RECEIVED ON ICE

TEMPERATURE

YES ☐ NO ☒

Date: 09/28/2005

Time: 2:00

Received by Laboratory:

Joe Callahan

Received by Laboratory:

Joe Callahan

Date: 09/27/2005

Time: 4:50