



engineering and constructing a better tomorrow

December 23, 2010

U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912
ATTN: Remediation General Permit NOI Processing
(via electronic mail: NPDES.Generalpermits@epa.gov)

MAG910309

RE: Notice of Intent for Remediation General Permit Reauthorization
NPDES RGP #MAG910309
Honeywell / Grimes Aerospace Conductorlab Site
430 Main Street
Groton, MA 01450

Dear Sir/Madam:

MACTEC Engineering and Consulting, Inc. (MACTEC), on behalf of Honeywell, is submitting this National Pollution Discharge Elimination System (NPDES) Remediation General Permit (RGP) Notice of Intent (NOI) for the discharge of treated groundwater originating from Massachusetts Contingency Plan (MCP) remediation activities at the above referenced Site. Authorization to discharge for the Site has been granted under an existing RGP #MAG910309. As required by the U.S. Environmental Protection Agency (USEPA), Honeywell is reapplying for coverage under the 2010 RGP MAG910000. Attached please find the following documents.

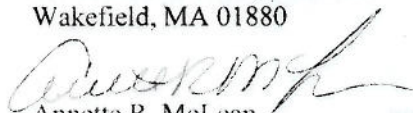
- Remediation General Permit Notice of Intent
- Figure 1 – Site Location
- Figure 2 – Site Plan Showing Location of Outfall(s)
- Figure 3 – Groundwater Treatment System Layout
- Attachment A: Petapawag ACEC, Department of Conservation and Recreation Map 18g
- Attachment B: Calculation of Dilution Factor for Metals
- Attachment C: Material Safety Data Sheet for polymer
- Attachment D: Massachusetts Department of Environmental Protection Correspondence
- Attachment E: Consultation with Services

As part of this submittal, Honeywell would like to take the opportunity to request a reduction in the influent monitoring requirements for the Site. As shown in Section 3.0 of the enclosed NOI, the 2-years worth of influent data shown that concentrations of many analytes were below the Minimum Level (ML) for the monitoring period December 2008 – November 2010. We will follow-up with you regarding this request by telephone within 30 days.

If you have any questions, or require further information, please feel free to contact us at 781-245-6606 or by e-mail as listed below.

Sincerely,

MACTEC Engineering and Consulting, Inc.
107 Audubon Road, Suite 301
Wakefield, MA 01880



Annette R. McLean
Project Scientist
armclean@mactec.com



for Kerry R. Tull, LSP
Senior Principal with permission
krtull@mactec.com

Enclosure

cc: Maria Kaouris, Honeywell

MassDEP, Bureau of Waste Site Cleanup – Northeast Regional Office
205B Lowell Street
Wilmington, Massachusetts 01887

MassDEP, Division of Watershed Management
627 Main Street, 2nd Floor
Worcester, MA 01608

Conductorlab Oversight Committee

MACTEC Project File

PA3650090142 - CLAB ISCO 2009/5.0 Project Information/5.4 Regulatory Requirements_Permits/RGP 2010 NOI/CL Cover Letter -2.docx

Enclosures: Remediation General Permit Notice of Intent
Figures 1, 2, and 3
Attachments A through E

REMEDATION GENERAL PERMIT NOTICE OF INTENT

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: Conductorlab Site		Facility/site mailing address:	
Location of facility/site: longitude: 42.613 latitude: -71.584		Facility SIC code(s): Facility Closed	Street: 430 Main Street
b) Name of facility/site owner: Honeywell / Grimes Aerospace		Town: Groton	County: Middlesex
Email address of facility/site owner: maria.kacuris@honeywell.com		State: MA	Zip: 01450
Telephone no. of facility/site owner: 973-455-3302		Owner is (check one): 1. Federal ☐ 2. State/Tribal ☐	
Fax no. of facility/site owner: 973-455-3082		3. Private ☒ 4. Other ☐ if so, describe:	
Address of owner (if different from site):			
Street: 101 Columbia Road			
Town: Morristown		State: NJ	Zip: 07960 County: Morris
c) Legal name of operator:		Operator telephone no:	
Same as Owner		Operator fax no.: Operator email:	
Operator contact name and title:			
Address of operator (if different from owner):		Street:	
Town:	State:	Zip:	County:

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 ☐ if Y, number MA031-093 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: MA031-093 2. permit or license # assigned: Tar 1A 3. state agency contact information: name, location, and telephone number: MassDEP Mark Baldi 627 Main Street, Worcester, MA 01608	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: _____ 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 ☒ See Attachment A	
h) Based on the facility/site information and any historical sampling data, identify the sub-category into which the potential discharge falls.	
Activity Category I - Petroleum Related Site Remediation	Activity Sub-Category 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: Groundwater contaminated with VOCs and metals is treated using electrochemical cell reduction, multi-media filtration, air stripper, and carbon treatment. Treated discharge is piped to an infiltration gallery and to a surface water discharge point (see Figure 2).																																	
b) Provide the following information about each discharge:																																	
1) Number of discharge points: <u>2</u>	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft³/s)? Max. flow: <u>0.04</u> Is maximum flow a design value? Y ☐ N ☐ Average flow (include units): <u>0.02 cfs</u> Is average flow a design value or estimate? Estimate ☐																																
3) Latitude and longitude of each discharge within 100 feet. <table border="1"> <tr> <td>pt. 1: lat</td> <td><u>42.618875</u></td> <td>long</td> <td><u>-71.582684</u></td> <td>pt. 2: lat</td> <td><u>42.619027</u></td> <td>long</td> <td><u>-71.583472</u></td> </tr> <tr> <td>pt. 3: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>long</u></td> <td>pt. 4: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>long</u></td> </tr> <tr> <td>pt. 5: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>long</u></td> <td>pt. 6: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>long</u></td> </tr> <tr> <td>pt. 7: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>long</u></td> <td>pt. 8: lat</td> <td><u>long</u></td> <td><u>long</u></td> <td><u>etc.</u></td> </tr> </table>		pt. 1: lat	<u>42.618875</u>	long	<u>-71.582684</u>	pt. 2: lat	<u>42.619027</u>	long	<u>-71.583472</u>	pt. 3: lat	<u>long</u>	<u>long</u>	<u>long</u>	pt. 4: lat	<u>long</u>	<u>long</u>	<u>long</u>	pt. 5: lat	<u>long</u>	<u>long</u>	<u>long</u>	pt. 6: lat	<u>long</u>	<u>long</u>	<u>long</u>	pt. 7: lat	<u>long</u>	<u>long</u>	<u>long</u>	pt. 8: lat	<u>long</u>	<u>long</u>	<u>etc.</u>
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4) If hydrostatic testing, total volume of the discharge (gals): <u> </u> 5) Is the discharge intermittent ☐ or seasonal ☐ ? Is discharge ongoing? Y ☐ N ☐																																	
c) Expected dates of discharge (mm/dd/yy): start <u>1/1/1989</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> </u> See Figures 2 and 3.																																	

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	Appendix III Effluent Limit (ug/L)	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical 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)
01 Total Suspended Solids		30000	X		1	Grab	SM 2540D	5	2000	0.104222	2000	0.104222
02 CHLORINE		11	X		1	Grab	8167	10	50	0.002606	50	0.002606
03 Total Petroleum Hydrocarbons (TPH)		5000		X	24	Grab	EPA 1664	3	4700	0.244922	1700	0.088589
04 CYANIDE	57125	5.2	X		1	Grab	L204001A CN	5	6	0.000313	6	0.000313
05 BENZENE	71432	5	X		24	Grab	624	2	25	0.001303	2.3	0.000120
06 TOLUENE	108883	limited as total BTEX	X		24	Grab	624	2	25	0.001303	2.3	0.000120
07 ETHYLBENZENE	100414	limited as total BTEX	X		24	Grab	624	2	120	0.006253	13	0.000677
08 O-XYLENE	95476	limited as total BTEX	X		24	Grab	624	2	25	0.001303	2.3	0.000120
08 XYLENES, M & P		limited as total BTEX	X		24	Grab	624	2	50	0.002606	4.7	0.000245
09 Total BTEX		100	X		24	Grab	624	0	245	0.012767	25	0.001303
10 1,2-DIBROMOETHANE	106934	0.05	X		1	Grab	504.1	0.01	0.02	1.0422E-06	0.02	0.000001
11 METHYL TERT-BUTYL ETHER	1634044	70	X		24	Grab	624	10	25	0.001303	1	0.000052
12 TERT-BUTYL ALCOHOL	75650		X		24	Grab	624	10	1200	0.062533	150	0.007817
13 TERT-AMYL METHYL ETHER (TAME)	994058		X		24	Grab	624	10	120	0.006253	11	0.000573
15 CARBON TETRACHLORIDE	56235	4.4	X		24	Grab	624	5	25	0.001303	1	0.000052
16 1,2-DICHLOROBENZENE	95501	600	X		24	Grab	624	5	25	0.001303	1	0.000052
17 1,3-DICHLOROBENZENE	541731	320	X		24	Grab	624	5	25	0.001303	1	0.000052
18 1,4-DICHLOROBENZENE	106467	5	X		24	Grab	624	5	25	0.001303	1	0.000052
18a Total Dichlorobenzene			X		24	Grab	624	0	75	0.003908	3.1	0.000162
19 1,1-DICHLOROETHANE	75343	70	X		24	Grab	624	5	25	0.001303	1	0.000052
20 1,2-DICHLOROETHANE	107062	5	X		24	Grab	624	5	25	0.001303	1	0.000052
21 1,1-DICHLOROETHENE	75354	3.2	X		24	Grab	624	5	25	0.001303	1	0.000052
22 CIS-1,2-DICHLOROETHENE	156592	70	X	X	24	Grab	624	5	110	0.005732	29	0.001511
23 METHYLENE CHLORIDE	75092	4.6	X		24	Grab	624	5	50	0.002606	4.2	0.000219
24 TETRACHLOROETHENE	127184	5	X	X	24	Grab	624	5	25	0.001303	1	0.000052
25 1,1,1-TRICHLOROETHANE	71556	200	X	X	24	Grab	624	5	25	0.001303	1	0.000052
26 1,1,2-TRICHLOROETHANE	79005	5	X		24	Grab	624	5	25	0.001303	1	0.000052
27 TRICHLOROETHENE	79016	5	X	X	24	Grab	624	5	610	0.031788	230	0.011986
28 VINYL CHLORIDE	75014	2	X	X	24	Grab	624	5	12	0.000625	0.5	0.000026
29 ACETONE	67641		X		24	Grab	624	50	1200	0.062533	110	0.005732
30 1,4-DIOXANE	123911		X		24	Grab	624	50	1200	0.062533	110	0.005732
31 PHENOL	108952	300	X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31a PHENOLS	64743039	300	X		24	Grab	L210-001A	5	64	0.003335	10	0.000521
31b 2,4,6-TRICHLOROPHENOL	88062		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31c 2,4-DICHLOROPHENOL	120832		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31d 2,4-DIMETHYLPHENOL	105679		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31e 2,4-DINITROPHENOL	51285		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31f 2-CHLOROPHENOL	95578		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31g 2-METHYLPHENOL	95487		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31h 2-NITROPHENOL	88755		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31i 3,4-METHYLPHENOL			X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31j 4,6-DINITRO-2-METHYLPHENOL	534521		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31k 4-CHLORO-3-METHYLPHENOL	59507		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
31l 4-NITROPHENOL	100027		X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
32 PENTACHLOROPHENOL	87865	1	X		24	Grab	625	10	0	0	0	0
33 Total Phthalates		3	X		24	Grab	625	0	11	0.000573	0.46	2.40E-05
33a BUTYLBENZYL PHTHALATE	85687		X		24	Grab	625	5	0	0	0	0
33b DI-N-BUTYL PHTHALATE	84742		X		25	Grab	625	5	0	0	0	0
33c DIETHYL PHTHALATE	84662		X		25	Grab	625	5	11	0.000573	0.44	2.29E-05
33d DIMETHYL PHTHALATE	131113		X		24	Grab	625	5	0	0	0	0
33e DI-N-OCTYL PHTHALATE	117840		X		24	Grab	625	5	0	0	0	0
34 BIS(2-ETHYLHEXYL)PHTHALATE	117817	6	X		24	Grab	625	5	0	0	0	0
35 Total Group I PAH Polycyclic Aromatic Hydrocarbons (PAH)		10	X		24	Grab	625	0	0	0	0	0

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	Appendix III Effluent Limit (ug/L)	Believed Absent	Believed Present	# of Samples	Sample Type (e.g., grab)	Analytical 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)
35a BENZO(A)ANTHRACENE	56553	0.0038	X		24	Grab	625	5	0	0	0	0
35b BENZO(A)PYRENE	50328	0.0038	X		24	Grab	625	5	0	0	0	0
35c BENZO(B)FLUORANTHENE	205992	0.0038	X		24	Grab	625	5	0	0	0	0
35d BENZO(K)FLUORANTHENE	207089	0.0038	X		24	Grab	625	5	0	0	0	0
35e CHRYSENE	218019	0.0038	X		24	Grab	625	5	0	0	0	0
35f DIBENZO(A,H)ANTHRACENE	53703	0.0038	X		24	Grab	625	5	0	0	0	0
35g INDENO(1,2,3-CD)PYRENE	193395	0.0038	X		24	Grab	625	5	0	0	0	0
36 Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		100	X		24	Grab	625	5	5.6	0.000292	2.6	0.000135
36h ACENAPHTHENE	83329	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36i ACENAPHTHYLENE	208968	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36j ANTHRACENE	120127	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36k BENZO(G,H)PERYLENE	191242	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36l FLUORANTHENE	206440	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36m FLUORENE	86737	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36n NAPHTHALENE	91203	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36o PHENANTHRENE	85018	limited as total Group II PAH	X		24	Grab	625	5	0	0	0	0
36p PYRENE	129000	limited as total Group II PAH	X		24	Grab	625	5	5.6	0.000292	2.6	1.35E-04
37 AROCLOR-1016	12674112		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1221	11104282		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1232	11141165		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1242	53469219		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1248	12672296		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1254	11097691		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 AROCLOR-1260	11096825		X		1	Grab	EPA 608	0.5	0.93	4.85E-05	0.93	4.85E-05
37 Total PCBs		0.000064	X		1	Grab	EPA 300.0 Part A	100	34000	1.77	34000	1.77E+00
38 CHLORIDE	16887006		X		1	Grab	200.8	0.5	0.74	3.86E-05	0.52	2.71E-05
39 ANTIMONY	7440360	5.6	X		24	Grab	EPA 200.7	20	0	0	0	0
40 ARSENIC	7440382	10	X		24	Grab	200.8	0.2	0.44	2.29E-05	0.31	1.62E-05
41 CADMIUM	7440439	0.2	X		24	Grab	200.8	1	1000	5.21E-02	760	3.96E-02
42 CHROMIUM	7440473		X		21	Grab	200.8	1	1430	7.45E-02	1300	6.77E-02
42 CHROMIUM	7440473		X		3	Grab	E200.7	15	1310	6.83E-02	1310	6.83E-02
42 CHROMIUM III	7440473		X		1	Grab	SW6010	15	720	3.75E-02	130	6.77E-03
43 HEXAVALENT CHROMIUM	16065831	48.8	X		12	Grab	SM 3500 CRD	1	1600	8.34E-02	790	4.12E-02
43 HEXAVALENT CHROMIUM	18540299	11.4	X		21	Grab	SM 3500 CRD	1	1500	7.82E-02	1400	7.30E-02
43 HEXAVALENT CHROMIUM	18540299	11.4	X		4	Grab	SW7199	1	86	4.48E-03	30	1.56E-03
44 COPPER	7440508	5.2	X		27	Grab	200.8	0.5	1.3	6.77E-05	0.2	1.04E-05
45 LEAD	7439921	1.3	X		24	Grab	200.8	0.2	0	0	0	0
46 MERCURY	7439976	0.9	X		15	Grab	E245.1	0.2	0	0	0	0
46 MERCURY	7439976	0.9	X		9	Grab	EPA 245.1	0.2	0	0	0	0
47 NICKEL	7440020	29	X		24	Grab	EPA 200.7	20	110	0.005732	6.5	0.000339
48 SELENIUM	7782492	5	X		24	Grab	200.8	2	0	0	0	0
49 SILVER	7440224	1.2	X		24	Grab	200.8	0.2	0.44	2.29E-05	0.3	1.56E-05
50 ZINC	7440666	66.6	X		24	Grab	EPA 200.7	15	16	0.000634	0.67	3.49E-05
51 IRON	7439896	1000	X		24	Grab	EPA 200.7	20	630	0.032830	61	0.003179
52 MANGANESE	7439965		X		24	Grab	EPA 200.7	20	2100	0.109433	770	0.040126

** 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, and total Xylenes

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

4* The sum of the individual phthalate compounds

Prepared by: BCG 12/7/10

Checked by: ARM 12/7/10

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)
		☐	☐								

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

Step 1: 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 ☐ Step 2: 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: cadmium DF: 1.96 Metal: hexavalent chromium DF: 1.96 Metal: copper DF: 1.96 Metal: _____ DF: _____ Etc.	If yes, which metals? cadmium, hexavalent chromium, and copper 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: cadmium, hexavalent chromium, and copper
---	--

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

a) A description of the treatment system, including a schematic of the proposed or existing treatment system: Groundwater is extracted using 10 recovery wells. Groundwater is treated using electrochemical reduction, clarification, aqueous phase carbon, and use of a shallow tray air stripper to remove dissolved organic contaminants. A schematic of the treatment system is provided as Figure 3.	
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): Electrochemical cell reduction, polymer addition, clarifier, filter press, multi-media filter.	

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 gpm Maximum flow rate of treatment system gpm
Design flow rate of treatment system gpm

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

Polymer is added. See material safety data sheet provided in Attachment C.

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): Unnamed brook
b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: Currently, and for several months, treated effluent has been discharged to the on-site infiltration gallery. See Figure 2.					
c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water. See Figure 2. 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 N/A See Attachment D for letter from MassDEP.					
e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water Seasonal, dry. Calculated 0.0386 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)?					
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.

- Figure 1 - Site Location
- Figure 2 - Site Plan
- Figure 3 - Groundwater Treatment System
- Attachment A - ACEC Information
- Attachment B - Dilution Factor Calculation for Metals
- Attachment C - Material Safety Data Sheet for Polymer
- Attachment D - MassDEP Letter Regarding Unnamed Brook Classification
- Attachment E - Consultation with Services

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:	Conductorlab Site
Operator signature:	<i>Maria Kaouris</i>
Printed Name & Title:	Maria Kaouris, Remediation Manager
Date:	1/3/2010

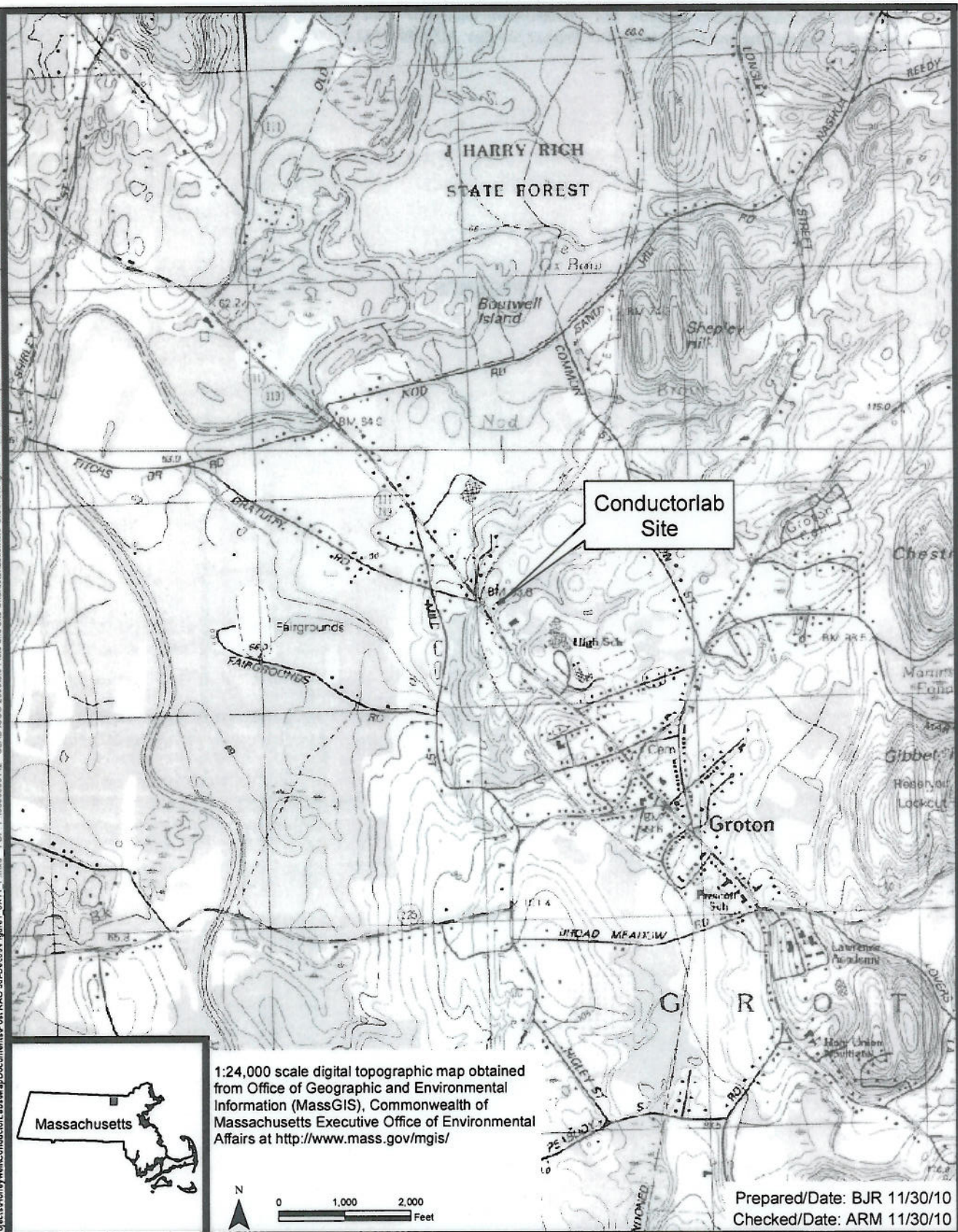
2011

121

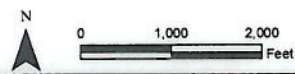
FIGURES



Document: P:\GIS\Projects\Honeywell\Conductorlab\RAO\RAO_3650-09-0142 - CLAB BCO 20090930 Field and Site Characterization\3.8 GIS\NOV\Figure 1 - Site Location.pdf 11/30/2010 7:57 AM broden



1:24,000 scale digital topographic map obtained from Office of Geographic and Environmental Information (MassGIS), Commonwealth of Massachusetts Executive Office of Environmental Affairs at <http://www.mass.gov/mgis/>



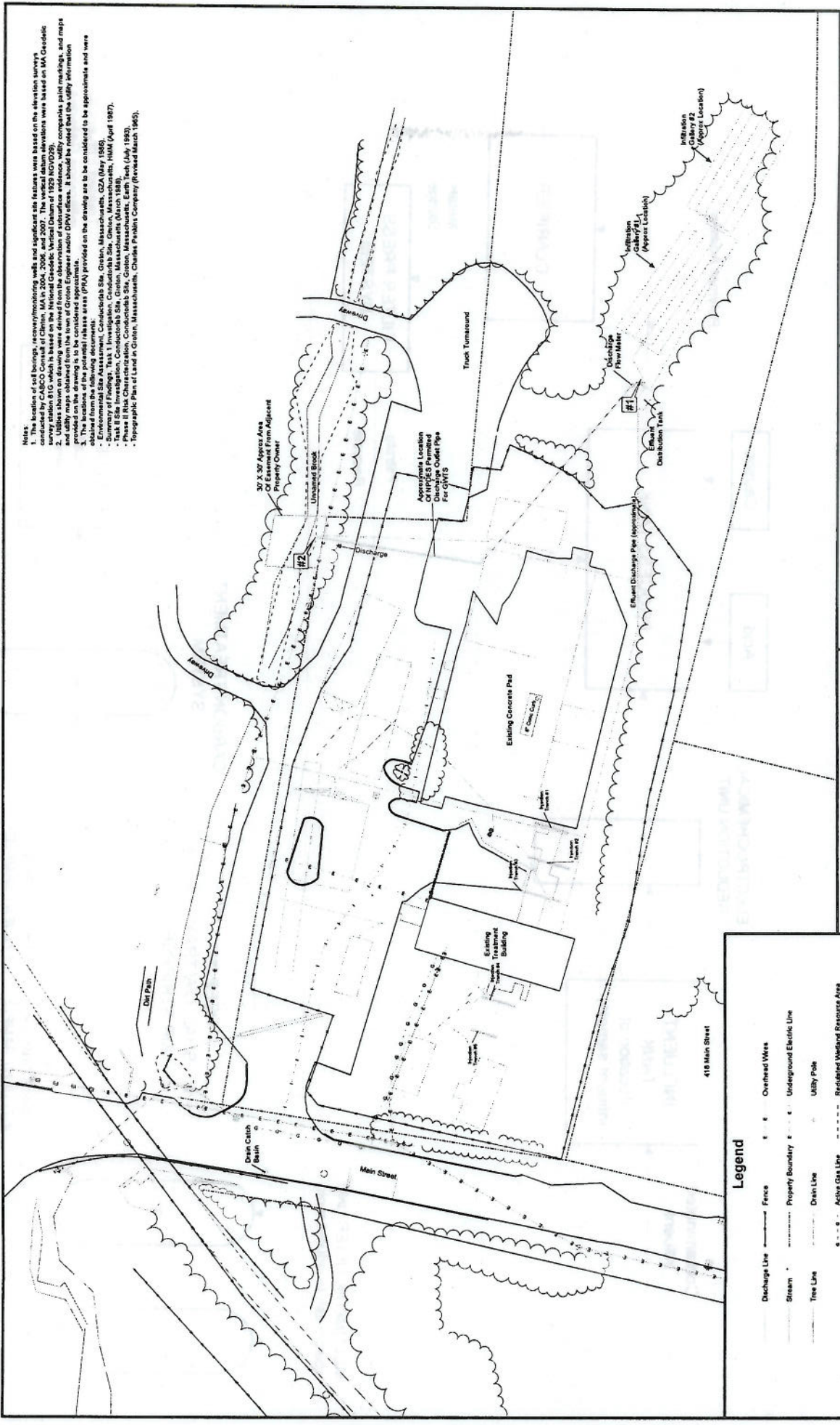
Prepared/Date: BJR 11/30/10
Checked/Date: ARM 11/30/10

Honeywell International Inc.
Conductorlab
Groton, Massachusetts



Site Location
Project 3650-09-0142
Figure 1

- Notes:**
1. The location of soil borings, recovery/monitoring wells and significant site features were based on the elevation surveys conducted by C&B CO. of Clinton, MA in 2004, 2006, and 2007. The vertical datum elevations were based on MA Geodetic datum of 1929.
 2. Utility maps shown on this drawing are based on the following documents:
- Utility maps obtained from the town of Groton Engineer and/or DPW offices. It should be noted that the utility information provided on this drawing is to be considered approximate.
 - Environmental Site Assessment, Conducted by Site, Groton, Massachusetts, GZA (May 1984).
 - Recovery/Investigation, Conducted by Site, Groton, Massachusetts, HMM (April 1987).
 - Tank Site Investigation, Conducted by Site, Groton, Massachusetts, Earth Tech (July 1993).
 - Phase II Risk Characterization, Conducted by Site, Groton, Massachusetts, Earth Tech (July 1993).
 - Topographic Plan of Land in Groton, Massachusetts, Charles P. Perkins Company (Revised March 1965).

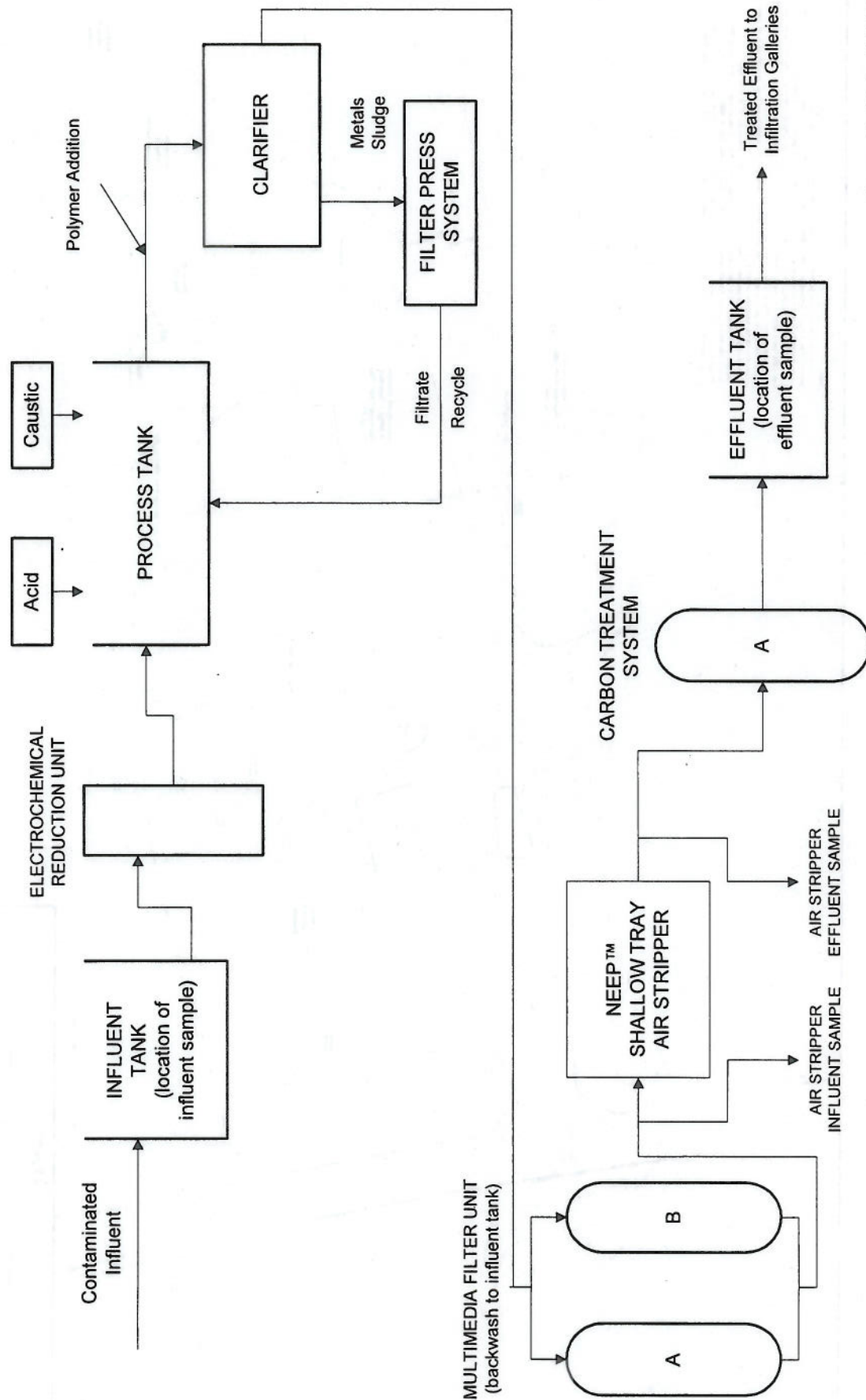


Legend

- Discharge Line
- Stream
- Tree Line
- Fence
- Property Boundary
- Drain Line
- Active Gas Line
- Inactive Gas Line
- Overhead Wires
- Underground Electric Line
- Utility Pole
- Reclaimed Wetland Resource Area

0 12.5 25 Feet

FIGURE 3
GROUNDWATER TREATMENT SYSTEM SCHEMATIC
CONDUCTORLAB SITE, GROTON, MA



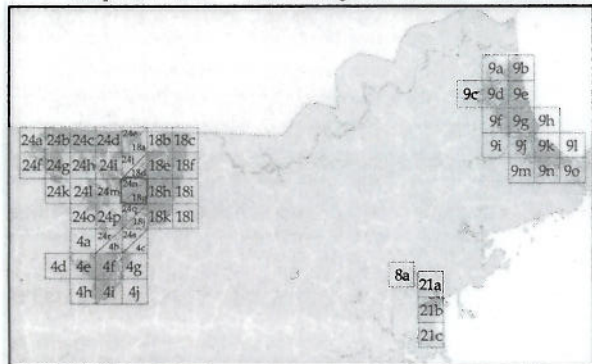
ATTACHMENT A

Petapawag ACEC, Department of Conservation and Recreation Map 18g





Map #
189 **Petapawag ACEC**
Map Tile 7 of 12 ACEC Designated 12/11/02 25,680 Acres



Massachusetts Department of
Conservation and Recreation
Areas of Critical Environmental
Concern (ACEC) Program

This map is intended to be used with the written boundary description contained in the ACEC designation document. The mapped boundary is not to be used by itself for definitive ACEC boundary delineation or regulatory interpretation. For review of site-specific projects within the ACEC boundary, determinations may need to be made in the field or in consultation with ACEC Program Staff.

For more information:

www.mass.gov/dcr/stewardship/acec

ACEC Boundaries by Type

- Road/Rail based
- River based
- Wetland based
- Floodplain based
- Tide based
- Contour based
- Political boundary
- Property line based
- Other
- Digital update required

Areas not within an ACEC are shaded with a gray mask.

dcr
Massachusetts



0.25

miles



N

December 23, 2010

ATTACHMENT B

Calculation Dilution Factor for Metals

ATTACHMENT B

Calculation Dilution Factor for Metals

Method:

1. Calculate 7Q10 flow of the stream (7 day minimum flow, 10 year recurrence). Calculated using the United States Geological Survey (USGS) StreamStats application.
2. Calculate dilution factor (DF) per NPDES remediation general permit Appendix V.
3. Look up revised effluent limit for discharge per NPDES remediation general permit Appendix IV.

Calculations:

1. 7Q10 Flow

Calculations obtained using the USGS Streamstats application found at:
<http://water.usgs.gov/osw/streamstats/massachusetts.html>.
See attached results.

The web application is based on the following:

Methods for Estimating Low-flow Statistics for Massachusetts Streams
By Kernell G. Ries, III and Paul J. Friesz
Water-Resources Investigations Report 00-4135

General method is as follows:

- located stream point at interest on map.
- review drainage basin interpreted by the program. Edit the drainage area if necessary.
- generate stream statistics using the program.
- review program output of notes and errors.

Discussions:

The unnamed brook that runs along the northwestern border of the property is not identified in the USGS Streamstats application at the property, but is identified further downstream from the Site. The 7Q10 flow was calculated at the downstream limit of the brook before it merges with another stream. This 7Q10 flow would represent a higher flow than actually is present at the Site; however, since the conclusions at this higher flow were not favorable for increasing the discharge limitations, no refinement of these calculations was pursued. It should also be noted that the size of the drainage basin is smaller than the tested range of the Streamstats application and, therefore, the accuracy of the calculation is not known.

Outputs: See attached drainage area included in the calculations.
See attached stream statistics generated by the application.

2. Dilution Factor(DF) was calculated as follows per NPDES remediation general permit, Appendix V:

$Q_d = 0.04$ cfs Maximum flow rate of the remediation discharge
 $Q_s = 0.0386$ cfs Receiving water 7Q10
 $DF = 1.96$ Dilution Factor = $(DF = (Q_d + Q_s) / Q_d)$

Where:

Q_d = Maximum flow rate of the remediation discharge in cubic feet per second (cfs)
 Q_s = Receiving water 7Q10 flow in cubic feet per second obtained from StreamStats program
 DF = calculated dilution factor

3. Evaluation of effluent limits

Reviewing Appendix IV to the NPDES general discharge permit for remediation, the Dilution Factor (DF) would have to be greater than 5 to result in any increase in the default limitation values under the permit.

Conclusion:

The drainage basin at the Site is small, and therefore there is insufficient flow in the unnamed brook to result in dilution of discharged treated groundwater that would allow higher effluent discharge limits.

Prepared by: ARM 11/24/2010

Checked by: KRT 12/9/2010



Massachusetts StreamStats

Streamstats Ungaged Site Report

Date: Thu Dec 9 2010 07:58:16 Mountain Standard Time

Site Location: Massachusetts

NAD27 Latitude: 42.6171 (42 37 01)

NAD27 Longitude: -71.5900 (-71 35 24)

NAD83 Latitude: 42.6172 (42 37 02)

NAD83 Longitude: -71.5895 (-71 35 22)

ReachCode: 01070004000579

Measure: 59.13

Drainage Area: 0.051 mi²

Low Flows Basin Characteristics			
100% Statewide Low Flow (0.051 mi ²)			
Parameter	Value	Regression Equation Valid Range	
		Min	Max
Drainage Area (square miles)	0.051 (below min value 1.61)	1.61	149
Mean Basin Slope from 250K DEM (percent)	3.04	0.32	24.6
Stratified Drift per Stream Length (square mile per mile)	6.25 (above max value 1.29)	0	1.29
Massachusetts Region (dimensionless)	0	0	1

Warning: Some parameters are outside the suggested range. Estimates will be extrapolations with unknown errors.

Probability of Perennial Flow Basin Characteristics			
100% Perennial Flow Probability (0.051 mi ²)			
Parameter	Value	Regression Equation Valid Range	
		Min	Max
Drainage Area (square miles)	0.051	0.01	1.99
Percent Underlain By Sand And Gravel (percent)	12.16	0	100
Percent Forest (percent)	22.97	0	100
Massachusetts Region (dimensionless)	0	0	1

Low Flows Streamflow Statistics					
Statistic	Flow (ft ³ /s)	Prediction Error (percent)	Equivalent years of record	90-Percent Prediction Interval	
				Minimum	Maximum
D50	0.0459				
D60	0.0421				
D70	0.0486				
D75	0.0455				
D80	0.0963				
D85	0.0774				
D90	0.13				
D95	0.0643				
D98	0.0426				
D99	0.0291				
M7D2Y	0.0396				
AUGD50	0.0809				
M7D10Y	0.0386				

The equation for estimating the probability of perennial flow is applicable for most areas of Massachusetts except eastern Buzzards Bay, Cape Cod, and the Island regions. The estimate obtained from the equation assumes natural flow conditions at the site. The equation also is best used for sites with drainage areas between 0.01 to 1.99 mi², as errors beyond for basins beyond these bounds are unknown.

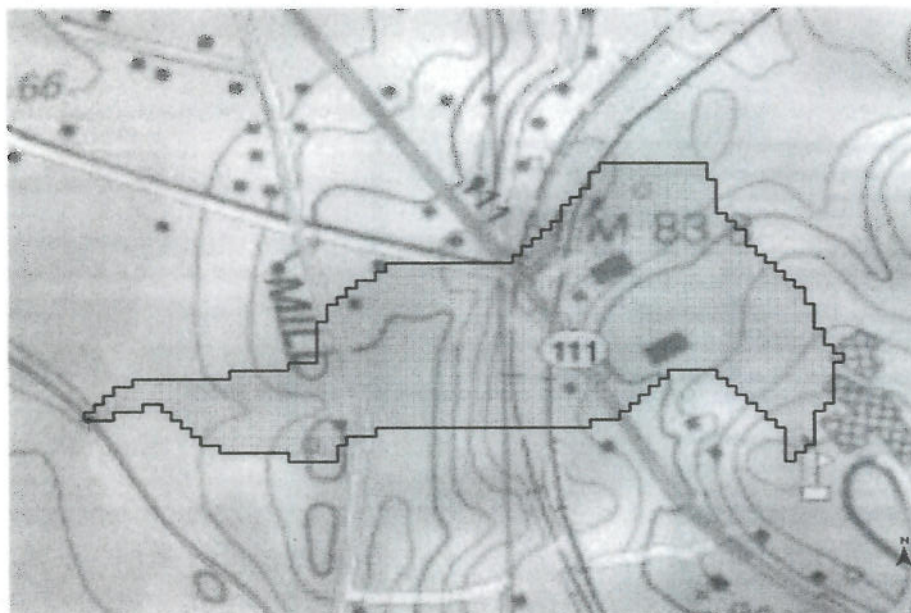
Probability of Perennial Flow Statistics		
Statistic	Value	Standard Error (percent)
PROBPEREN	0.37	0.5



Massachusetts StreamStats

StreamStats Print Page

Conductorlab - RGP



0.00 0.045 0 0.09 Miles

12/9/2010 8:00:43 AM

- Explanation**
- GlobalWatershedPoint
 - NHDHGage
 - NHDHdam
 - huc_nel_junctions
 - Gaging Station, Continuous Record
 - Low Flow, Partial Record
 - Peak Flow, Partial Record
 - Peak and Low Flow, Partial Record
 - Miscellaneous Record
 - Unknown
 - Dendritic Stream Network
 - streams
 - GlobalWatershed
 - Excludepoly
 - hucpoly

*Massachusetts StreamStats***Basin Characteristics Report****Date:** Thu Dec 9 2010 08:02:34 Mountain Standard Time**NAD27 Latitude:** 42.6171 (42 37 01)**NAD27 Longitude:** -71.5900 (-71 35 24)**NAD83 Latitude:** 42.6172 (42 37 02)**NAD83 Longitude:** -71.5895 (-71 35 22)**ReachCode:** 01070004000579**Measure:** 59.13

Parameter	Value
Area in square miles	0.051
Average area slope in percent	3.04
Total stream length in miles	0.001
stratified drift per unit stream length	6.25
low flow region indicator for Massachusetts	0
Area of forest land (percent)	22.97
Area of sand and gravel deposits (percent)	12.16

ATTACHMENT C

Material Safety Data Sheet for polymer

ARIES CHEMICAL INCORPORATED

DEPOT ST., P.O. BOX 519
BEAVER FALLS, NEW YORK 13305
315-346-1489 FAX: 315-346-1668

3644 Page 2

Origination Date: 06-16-00
Revision Date: 08-15-02

3644

SECTION 1 - GENERAL INFORMATION

TRADE NAME: Aries 3644, 3766
EMERGENCY PHONE NO: INFOTRAC #800-535-5053
CHEMICAL NAME: Anionic Flocculant
DISTRIBUTOR'S D-U-N-S NO: 14-861-3045

HAZARDOUS MATERIAL DESCRIPTION: Nonhazardous
FREIGHT CLASS: 55
SHIPPING NUMBER: N/A

SYNONYMS: Anionic polyacrylamide in water-in-oil emulsion
FORMULA: Mixture
CHEMICAL FAMILY: Anionic Polymer
MOLECULAR WEIGHT: Mixture

SECTION 2 - HAZARDOUS INGREDIENTS

INGREDIENTS	% BY WT.	CAS NO.	OSHA	ACGIH	TWA
Petroleum Distillate	20.5-22.5	064742-47-8	500 ppm		
Sodium metabisulfite	0.6-0.8	007631-90-5			5mg/m3

HAZARD RATING	HEALTH		REACTIVITY	
	FIRE	SPECIAL	1	0

SECTION 3 - PHYSICAL AND CHEMICAL PROPERTIES

SPECIFIC GRAVITY: - .99 - 1.1
pH: 6.8 (in water)
BOILING POINT: -350-500 F
SOLUBILITY IN WATER: Limited by viscosity
VAPOR PRESSURE: N/A
PERCENT VOLATILE BY VOLUME: 64-65
EVAPORATION RATE: N/A
APPEARANCE AND ODOR: Grayish-white, viscous emulsion; faint ammonia odor.
MATERIAL: Liquid.

SECTION 4 - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: N/A
FLAMMABLE LIMITS: LEL: N/A UEL: N/A

AUTO IGNITION TEMPERATURE: N/A

EXTINGUISHING MEDIA: Use water spray, carbon dioxide or dry chemical to extinguish fires. Use water to keep containers cool.

SPECIAL FIRE FIGHTING PROCEDURES: Wear self-contained, positive pressure breathing apparatus and full fire-fighting protective clothing.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Thermal decomposition may release oxides of carbon and nitrogen, ammonia, hydrogen chloride.

SECTION 7 - SPILL OR LEAK PROCEDURE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: When exposure level is not known, wear NIOSH approved, positive pressure, self-contained respirator. Where exposure level is known, wear NIOSH approved respirator suitable for level of exposure. Spilled material should be absorbed onto inert material and scooped into an approved container for disposal. Flush remainder thoroughly with water and scrub to remove residue. Repeat if slipperiness remains.

WASTE DISPOSAL METHODS: Dispose of in accordance with Federal, State and Local regulations.

ENVIRONMENTAL TOXICITY DATA: Not available.

HAZARDOUS WASTE 40CFR261: N/A

HAZARDOUS WASTE NO: N/A

CONTAINER DISPOSAL: Returnable.

SECTION 8 - SPECIAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: Where exposure level is not known, wear NIOSH approved, positive pressure, self-contained respirator. Where exposure level is known, wear NIOSH approved respirator suitable for level of exposure.

EYE PROTECTION: For operations where eye or face contact can occur, wear eye protection such as chemical splash proof goggles or face shield. Eyewash equipment and safety shower should be provided in areas of potential exposure.

PROTECTION CLOTHING: Protective clothing such as impervious gloves, apron, workpants, long sleeve workshirt or disposable coveralls are recommended to prevent skin contact.

VENTILATION: Where this material is not used in a closed system, good enclosure and local exhaust ventilation should be provided to control exposure.

OTHER: Food, beverages and tobacco products should not be carried, stored or consumed where this material is in use. Before eating, drinking or smoking, wash face and hands with soap and water. Avoid skin contact.

SECTION 5 - HEALTH HAZARD DATA

EFFECTS OF EXPOSURE: Acute oral (rat) and dermal (rabbit) LD50 values are estimated to be greater than 5,000 mg/kg and greater than 2,000 mg/kg, respectively. The 4-hour inhalation LC50 (rat) value is estimated to be greater than 20 mg/L. Direct contact with this material can cause moderate skin and mild eye irritation.

INGESTION: Drink copious quantities of water. Immediately seek medical attention.

SKIN CONTACT: In case of skin contact, remove contaminated clothing without delay. Flush skin thoroughly with water. Do not reuse clothing without laundering. If irritation persists, seek medical attention.

EYE CONTACT: In case of eye contact, immediately irrigate with plenty of water for 15 minutes, lifting eyelids often. Seek medical attention.

INHALATION: Remove individual to fresh air. Initiate artificial resuscitation and CPR if necessary. Seek medical attention.

CARCINOGENICITY: Not a carcinogen.

SECTION 6 - REACTIVITY DATA

STABILITY: HAZARDOUS POLYMERIZATION:
Stable Will not occur.

CONDITIONS TO AVOID: Store away from sources of heat and ignition. Do not cut, grind or weld near containers.

MATERIALS TO AVOID: Strong oxidizing agents. This material reacts slowly with iron, copper and aluminum, resulting in corrosion and product degradation.

HAZARDOUS DECOMPOSITION OR BY-PRODUCTS: Carbon monoxide; carbon dioxide; ammonia; hydrogen chloride vapor; oxides of nitrogen.

SECTION 9 - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: To avoid product degradation and equipment corrosion, do not use iron, copper or aluminum containers or equipment. Do not cut, weld or grind near containers.

OTHER PRECAUTIONS: Avoid contact with eyes, skin and clothing. Wash thoroughly after handling.

SECTION 10 - REGULATORY INFORMATION

SECTION 313 - SUPPLIER NOTIFICATION

THIS PRODUCT DOES NOT CONTAIN ANY TOXIC CHEMICALS WHICH ARE REPORTABLE UNDER SECTION 313 OF THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 (40 CFR 372).

TSCA (Toxic Substances Control Act) Status: The components of this product are listed on the TSCA Inventory.

APPROVED BY: MARK MARCIN
TECHNICAL DIRECTOR

WHILE ARIES CHEMICAL INC. BELIEVES THE DATA SET FORTH HEREIN IS ACCURATE AS OF THE DATE HEREOF, ARIES CHEMICAL MAKES NO WARRANTY WITH RESPECT THERETO AND EXPRESSLY DISCLAIMS ALL LIABILITY FOR REFINANCE THEREON OF SUCH DATA, AND IS OFFERED SOLELY FOR YOUR CONSIDERATION, INVESTIGATION, AND VERIFICATION.

ATTACHMENT D

Massachusetts Department of Environmental Protection Correspondence



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Watershed Management, 627 Main Street 2nd Floor, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

LAUREN A. LISS
Commissioner

February 3, 2003

Mr. David Perry
Project Engineer
Parsons
100 Summer Street - 8th Floor
Boston, MA 02110

Re: Outstanding Resource Water
Conductorlab Site
Groton, Massachusetts

Dear Mr. Perry:

Please excuse the delay in responding to your recent inquiry regarding the need to obtain a permit required by Massachusetts Surface Water Discharge Permit Program (314 CMR 3.00) for the discharge from a ground water remediation and treatment system located at Conductorlab in Groton, Massachusetts. The discharge is currently authorized by and in compliance with the Massachusetts Contingency Plan as a Tier 1B site. The receiving water is an unnamed tributary to Gratuity Brook.

Please be advised that the Department has reviewed the pertinent information and determined that the unnamed tributary to Gratuity Brook is **not** classified as an Outstanding Resource Water. Therefore, a permit is **not** required in accordance with 314 CMR 3.05(8).

If you should have any questions regarding this determination, Please contact me at (508) 849-4003 at your earliest convenience.

Sincerely,

Bryant J. Firmin
Surface Water Discharge Permit Program

Cc: Brian Pitt, USEPA, Boston, MA

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

<http://www.state.ma.us/dep> • Phone (508) 792-7470 • Fax (508) 791-4131

Printed on Recycled Paper

ATTACHMENT 2

ATTACHMENT E

Correspondence with National Fish and Wildlife Services



engineering and constructing a better tomorrow

December 23, 2010

U.S. Fish and Wildlife Service
New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087

**RE: Request for Cultural Resource Information
Honeywell / Grimes Aerospace Conductorlab Site
430 Main Street
Groton, MA 01450
MACTEC Project No. 3650090142**

Dear Fish and Wildlife Reviewer:

MACTEC Engineering and Consulting, Inc. (MACTEC) respectfully requests information regarding the presence of rare, threatened, and endangered species and associated critical habitat known in the vicinity of the Conductorlab facility located at 430 Main Street, Groton, Middlesex County, Massachusetts (please refer to the attached Site Locus Map). We are requesting this information as part of a National Pollutant Discharge Elimination System (NPDES) 2010 Remedial General Permit (RGP) renewal application.

From a preliminary review of information provided in the NPDES 2010 RGP (Appendix II: *Endangered Species Act: List of Species by County in Massachusetts and New Hampshire*), we identified the Small Whorled Pogonia as a Threatened species that exists in Groton, Massachusetts. We request any further information about the presence of this species in the vicinity of the Conductorlab Site.

Please feel free to call Annette McLean at 781-213-5608 or Kerry Tull at 781-213-5637 with any questions regarding this request. Thank you in advance for this information.

Sincerely,
MACTEC, Engineering and Consulting, Inc.

Annette R. McLean
Project Scientist

for Kerry R. Tull, LSP
Senior Principal with permission

cc: Maria Kaoris, Honeywell

Project File P:\3650090142 - CLAB ISCO 2009\5.0 Project Information\5.4 Regulatory Requirements_Permits\RGP 2010 NOFUSFWsrequest-CL.doc

