



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

BOSTON, MA 02109-3912

CERTIFIED MAIL RETURN RECEIPT REQUESTED

NOV 03 2011

Abby Albano
Project Manager
Environmental Compliance Services, Inc.
588 Silver St.
Agawam, MA 01001

Re: Authorization to discharge under the Remediation General Permit (RGP) –
MAG910000. Pride Station, Southwick site located at 198 College Highway, Southwick,
MA 01077, Hampden County; Authorization # MAG910508

Dear Ms. Albano:

Based on the review of a Notice of Intent (NOI) submitted on behalf of Pride Convenience, Inc., by your firm Environmental Compliance Services, Inc., 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 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 checklist 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 the enclosed checklist includes parameters that exceeded Appendix III limits. The checklist also includes other parameters for which your laboratory reports indicated there was insufficient sensitivity to detect these parameters at the minimum levels established in Appendix VI of the RGP.

Also, please note that the metals included on the checklist are dilution dependent pollutants and subject to limitations based on selected dilution ranges and technology-based ceiling limitations. For each parameter the dilution factor 9.96 for this site is within a dilution range greater than five to ten (>5-10), established in the RGP. (See the RGP Appendix IV for Massachusetts facilities). Therefore, the limits for arsenic of 50 ug/L,

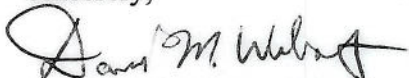
cadmium of 1 ug/L, copper of 26 ug/L, lead of 6.5 ug/L, zinc of 333 ug/L and iron of 5,000ug/L, are required to achieve permit compliance at your site.

Finally, please note the checklist 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. A recertification can be submitted to EPA within six (6) to twelve (12) months of operations in accordance with the 2010 RGP regulations.

This general permit and authorization to discharge will expire on September 9, 2015. You have reported that this project will terminate on December 1, 2011. 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
Dennis Clark, Town of Southwick Conservation Commission
Daniel W. Felten, ECS

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

NPDES Authorization Number:	MAG910508
Authorization Issued:	November, 2011
Facility/Site Name:	Pride Station Southwick
Facility/Site Address:	198 College Highway, Southwick, MA 01077, Hampden County
	Email address of owner: tripride@comcast.net
Legal Name of Operator:	Abby Albano, Project Manager
Operator contact name, title, and Address:	588 Silver Street, Agawam, MA 01001, Hampden County
	Email: dfelten@ecsconsultant.com
Estimated Date of Completion:	December 1, 2011
Category and Sub-Category:	Category III- Contaminated Construction Dewatering. Sub-category B. Known Contaminated Sites
RGP Termination Date:	September 10, 2015
Receiving Water:	Palmer Brook

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 Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
✓	1. Total Suspended Solids (TSS)	30 milligrams/liter (mg/L) **, 50 mg/L for hydrostatic testing **, Me#60.2/ML5ug/L
	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/ML 5.0mg/L
	4. Cyanide (CN) ^{2, 3}	Freshwater = 5.2 ug/l ** Saltwater = 1.0 ug/L **/ Me#335.4/ML 10ug/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

	<u>Parameter</u>	<u>Effluent Limit/Method#/ML</u> (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	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 (TAME)	Monitor Only(ug/L)/Me#8260C/ML 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/ ML 5ug/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/ML 50ug/L
	31. Total Phenols	300 ug/L Me#420.1&420.2/ML 2 ug/L/ Me# 420.4 /ML 50ug/L
	32. Pentachlorophenol (PCP)	1.0 ug/L /Me#8270D/ML 5ug/L,Me#604 &625/ML 10ug/L
	33. Total Phthalates (Phthalate esters) ⁶	3.0 ug/L ** /Me#8270D/ML 5ug/L, Me#606/ML 10ug/L& Me#625/ML 5ug/L
	34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	6.0 ug/L /Me#8270D/ML 5ug/L,Me#606/ML 10ug/L & Me#625/ML 5ug/L
	35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	10.0 ug/L
	a. Benzo(a) Anthracene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L

	<u>Parameter</u>	<u>Effluent Limit/Method#/ML</u> (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
	b. Benzo(a) Pyrene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	c. Benzo(b)Fluoranthene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	d. Benzo(k)Fluoranthene ⁷	0.0038 ug/L /Me#8270D/ ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	e. Chrysene ⁷	0.0038 ug/L /Me#8270D/ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	f. Dibenzo(a,h)anthracene ⁷	0.0038 ug/L /Me#8270D/ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	g. Indeno(1,2,3-cd) Pyrene ⁷	0.0038 ug/L /Me#8270D/ML 5ug/L, Me#610/ML 5ug/L& Me#625/ML 5ug/L
	36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	100 ug/L
	h. Acenaphthene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	i. Acenaphthylene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	j. Anthracene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	k. Benzo(ghi) Perylene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	l. Fluoranthene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	m. Fluorene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	n. Naphthalene ⁵	20 ug/L / Me#8270/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	o. Phenanthrene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/L
	p. Pyrene	X/Me#8270D/ML 5ug/L, Me#610/ML 5ug/L & Me#625/ML 5ug/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>Metal parameter</u>	<u>Total Recoverable Metal Limit @ H ¹⁰ = 50 mg/l CaCO3 for discharges in Massachusetts (ug/l) ^{11/12}</u>	<u>Minimum level=ML</u>
		<u>Freshwater</u>	
	39. Antimony	5.6/ML 10	
✓	40. Arsenic **	50/ML 20	

	Metal parameter	Total Recoverable Metal Limit @ H¹⁰ = 50 mg/l CaCO₃ for discharges in Massachusetts (ug/l)^{11/12}		Minimum level=ML	
		Freshwater			
✓	41. Cadmium **	1.0/ML10			
	42. Chromium III (trivalent) **	48.8/ML15			
	43. Chromium VI (hexavalent) **	11.4/ML10			
✓	44. Copper **	26/ML15			
✓	45. Lead **	6.5/ML20			
	46. Mercury **	0.9/ML0.2			
	47. Nickel **	29/ML20			
	48. Selenium **	5/ML20			
	49. Silver	1.2/ML10			
✓	50. Zinc **	333/ML15			
✓	51. Iron	5,000/ML 20			

	Other Parameters	Limit
✓	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.

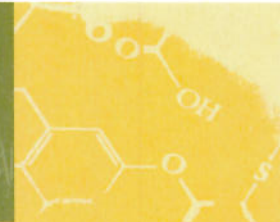
¹² Minimum Level (ML) is the lowest level at which the analytical system gives a recognizable signal and acceptable calibration point for the analyte. The ML represents the lowest concentration at which an analyte can be measured with a known level of confidence. The ML is calculated by multiplying the 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



WHERE BUSINESS AND THE ENVIRONMENT CONVERGE



588 Silver Street, Agawam, MA 01001 tel 413.789.3530 fax 413.789.2776 www.ecsconsult.com

Mr. Victor Alvarez
United States Environmental
Protection Agency, Region 1
RPG-NOC Processing
5 Post Office Square, Suite 100
Boston, MA 02109

October 20, 2011
Project No. 91-012756.00
Document No. 40607

MA6910508

RE: Pride Convenience, Inc.
198 College Highway
Southwick, Massachusetts
MassDEP RTN 1-11532

Dear Mr. Alvarez:

Environmental Compliance Services, Inc. (ECS) is pleased to provide supporting documentation for the Notice of Intent (NOI) for the Remediation General Permit (RGP) on behalf of Pride Convenience, Inc. (Pride). This NOI is submitted in order to obtain a permit for the operation of a temporary groundwater recovery and treatment system (GWTS) to be located at 198 College Highway, Southwick, Hampden County Massachusetts (the Site). The GWTS will be operated during construction activities at the Site in order to allow for the removal of petroleum-impacted soil, collection of soil samples, and removal and replacement of the underground storage tank (UST) system. A Site Locus is provided as Figure 1 and a Site Plan is provided as Figure 2. A copy of the NOI form is provided as Attachment I.

System Design

The groundwater treatment system located on the Site will be composed of submersible pneumatic pumps that collect groundwater from the excavation area. Recovered groundwater will be pumped to a frac tank and subsequently pumped through bag filters and two to three 500 pound liquid phase granular activated carbon units (plumbed in series) prior to discharge to the Department of Transportation storm water line located in College Highway. The storm water line outfalls to the Palmer Brook and associated wetland system to the south of the Site, which merges with Mountain Brook at the Connecticut state line to the southeast of the Site.

A Site plan detailing the location of the groundwater treatment system, the catch basin for the storm water line, and the planned excavation areas is provided as Figure 2. A line diagram of the groundwater treatment system is provided as Figure 3. The outfall location of the storm water line and surface water bodies adjacent to the outfall location are indicated on the Site Locus, Figure 1.

Average flow rate of discharge of treated groundwater from the system to the storm water line is expected to be approximately 5 gallons per minute (gpm). The design capacity of the groundwater treatment system is 25 gpm based upon a design capacity of the submersible pump. As a conservative estimate, a maximum flow capacity for the groundwater treatment system was estimated at 25 gpm.

Influent Sample Analysis

Groundwater samples were collected at monitoring wells MW-3 and ECS-3, located in the areas of planned excavation, on March 18, 2011. The samples were submitted to Spectrum Analytical, Inc. of Agawam, Massachusetts under standard chain of custody protocol for analysis of semivolatile organic compounds (SVOCs) by USEPA Method 625, volatile organic compounds (VOCs) by USEPA Method 8260B, polychlorinated biphenyls (PCBs) by USEPA Method 608, total petroleum hydrocarbons (TPH) by USEPA Method 1664, ethylene dibromide (EDB) by USEPA Method 504.1, total metals (silver, arsenic, cadmium, chromium, copper, iron, nickel, lead, antimony, selenium, and zinc) by USEPA Method 200.7, mercury by USEPA Method 245.1/7470A, cyanide by USEPA Method 9012A, total residual chlorine by Hach 8167, chloride by USEPA Method 300, and total suspended solids by SM2540D. A copy of the laboratory report and chain of custody record are provided as Attachment II. It should be noted that analytical data for a sample from well MW-2, also located at the Site, is included on the laboratory chain of custody. This sample was collected and analyzed for volatile petroleum hydrocarbons as parts of on-going Site monitoring activities that are conducted under the Massachusetts Contingency Plan (MCP) 310 CMR 40.000. This well is not located within the area that dewatering is expected to occur, and is not considered representative of influent water for these activities.

Table 1 summarizes the results of the sample analyses. Arsenic, cadmium, copper, iron, lead, zinc, total suspended solids, chloride, ethylbenzene, isopropylbenzene, naphthalene, n-propylbenzene, 1,2,4-trimethylbenzene and m,p-xylenes were detected in the sample collected at MW-3 and/or ECS-3 in September 2011. Comparison of the concentrations of these compounds to the Appendix III effluent limitations (http://www.epa.gov/ne/npdes/remediation/RGP2010_PermitAppendixIII.pdf, accessed September 28, 2011) indicates that the detected average concentrations of arsenic, cadmium, copper, lead, zinc, iron, and total suspended solids were above the Appendix III effluent limitations.

Receiving Waters Information

The receiving water for the treated groundwater discharge is the Palmer Brook, located approximately 1.3 miles south of the Site. The Palmer Brook and associated wetlands are part of the Connecticut River Drainage Basin, and it flows south through Southwick, MA and into the Mountain Brook at the Connecticut State border.

ECS consulted the online United States Geological Survey (USGS) Streamstats program to determine the 7Q10 flow rate at the discharge location (<http://streamstatsags.cr.usgs.gov/gages/viewer/14.htm?stabbr=GAGES>, accessed September 7, 2011). No stream gauge locations for the discharge point were available for review. ECS consulted with the Connecticut Department of Energy and Environmental Protection (CT DEEP). Based on data available for the area, the CT DEEP calculated a 7Q10 for this area of 0.5 cubic feet per second (cfs).

Based upon an estimated maximum flow rate of the discharge from the groundwater treatment system of 25 gpm, the dilution factor was calculated as:

Equation 1: $DF = (Q_d + Q_s)/Q_d$

Where: DF = DilutionFactor
 Q_d = Maximum flow rate of the discharge in cfs)
 Q_s = Receiving water 7Q10 flow (cfs), where,
7Q10 = The minimum flow (cfs) for 7 consecutive days with a
recurrence interval of 10 years

$$Q_d = 25 \text{ gpm} \times 0.00223 \text{ cfs/gpm} = 0.0558 \text{ cfs}$$

$$DF = (0.0558 + 0.5)/(0.0558)$$
$$DF = 9.96$$

The concentrations of arsenic, cadmium, copper, lead, zinc and iron reported present in the untreated sample were compared to the column corresponding to a dilution factor of 9.96 (> 5-10) in Appendix IV table. The discharge limits listed in the Appendix IV table are as follows: 50 µg/L for arsenic, 1 µg/L for cadmium, 26 µg/L for copper, 6.5 µg/L for lead, 333 µg/L for zinc and 5,000 µg/L for iron. Based upon this information and average concentrations, arsenic, copper and zinc should not be subject to monitoring requirements for this discharge; cadmium, lead and iron should be subject to monitoring requirements. There is no permit effluent limit for chloride. Based upon the presence of chloride in the groundwater samples, chloride should be subject to monitoring requirements for this discharge.

Receiving Water Classification

ECS consulted the Massachusetts Department of Environmental Protection (MassDEP) Division of Water Pollution Control (<http://www.mass.gov/dep/water/laws/tblfig.pdf>) to determine the classification for the receiving waters. No surface water classification information was available for the Palmer Brook. The Connecticut Environmental Conditions online database (<http://www.cteco.uconn.edu/>) was consulted to determine the classification of surface waters in the area where Palmer Brook merges with Mountain Brook, at the state line. This resource indicates that the surface water in this region is classified as A; wherein the waters are expected to meet established water quality criteria established by the state. No Total Maximum Daily Loads (TMDL) was available for this area. The discharge location is not located in a surface water supply watershed protection area.

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Mr. Victor Alvarez
USEPA Region 1
October 20, 2011

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Evaluation of Threatened or Endangered Species or Critical Habitat Located within Receiving Waters

According to Massachusetts Geographic Information Systems (MassGIS) online maps for the Natural Heritage Endangered Species Program (NHESP) (2008), a Priority Habitat of Rare Species and an Estimated Habitat of Rare Wildlife are located within at the proposed discharge area. A copy of the NHESP Map is provided as Attachment III. The area is designated as Priority Habitat (PH) 52 and Estimated Habitat (EH) 1018. Information regarding this Estimated and Priority Habitat has been requested from the Massachusetts Division of Fisheries and Wildlife and is pending. According to the letter received from the Commonwealth of Massachusetts Division of Fisheries and Wildlife, dated October 6, 2011, the species of concern in this area is the American Bittern (*Botaurus lentiginos*), and endangered species. A Massachusetts Endangered Species Act (MESA) Project Review request is being submitted to the NHESP concurrent with the submittal of this permit.

There are no Areas of Critical Environmental Concern known to exist within one mile of the proposed discharge area.

Review of National Register of Historic Places

A listing of all Historic Places within the town of Southwick was obtained from the Massachusetts Cultural Resources Information System (MACRIS) online database at <http://mhc-macris.net/towns.aspx> (accessed March 28, 2011). Copies of the MACRIS report for College Highway are provided as Attachment IV. The database indicated that there are no historic places located in close proximity to the Site and proposed discharge area. This project does involve the demolition or rehabilitation of existing structures and historic properties are not affected by the discharge or identified in the path of the discharges regulated by this permit, and are not identified where installation or construction of treatment systems or BMPs to control such discharges are planned.

Project No. 91-012756.00/Document No. 40607
Mr. Victor Alvarez
USEPA Region 1
October 20, 2011

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Copies of this letter and supporting documentation have been forwarded to Mr. Michael Reed at the Western Regional Office of the MassDEP and to Mr. Jeffery Neece, Director of the Department of Public Works for the Town of Southwick. Should you have any questions or concerns regarding the contents of this letter or the NOI for the RGP, please do not hesitate to contact the undersigned at (413) 789-3530.

Sincerely,
ENVIRONMENTAL COMPLIANCE SERVICES, INC.



Abby E. Albano
Project Manager



Daniel W. Felten, P.E., LSP, LEP
Sr. Vice President, Technology

AEA/DWF/kab
Attachments

cc: M. Reed, MassDEP, WERO (via eDEP)
D. Clark, Town of Southwick Conservation Commission
R. Bolduc, Pride Convenience, Inc.

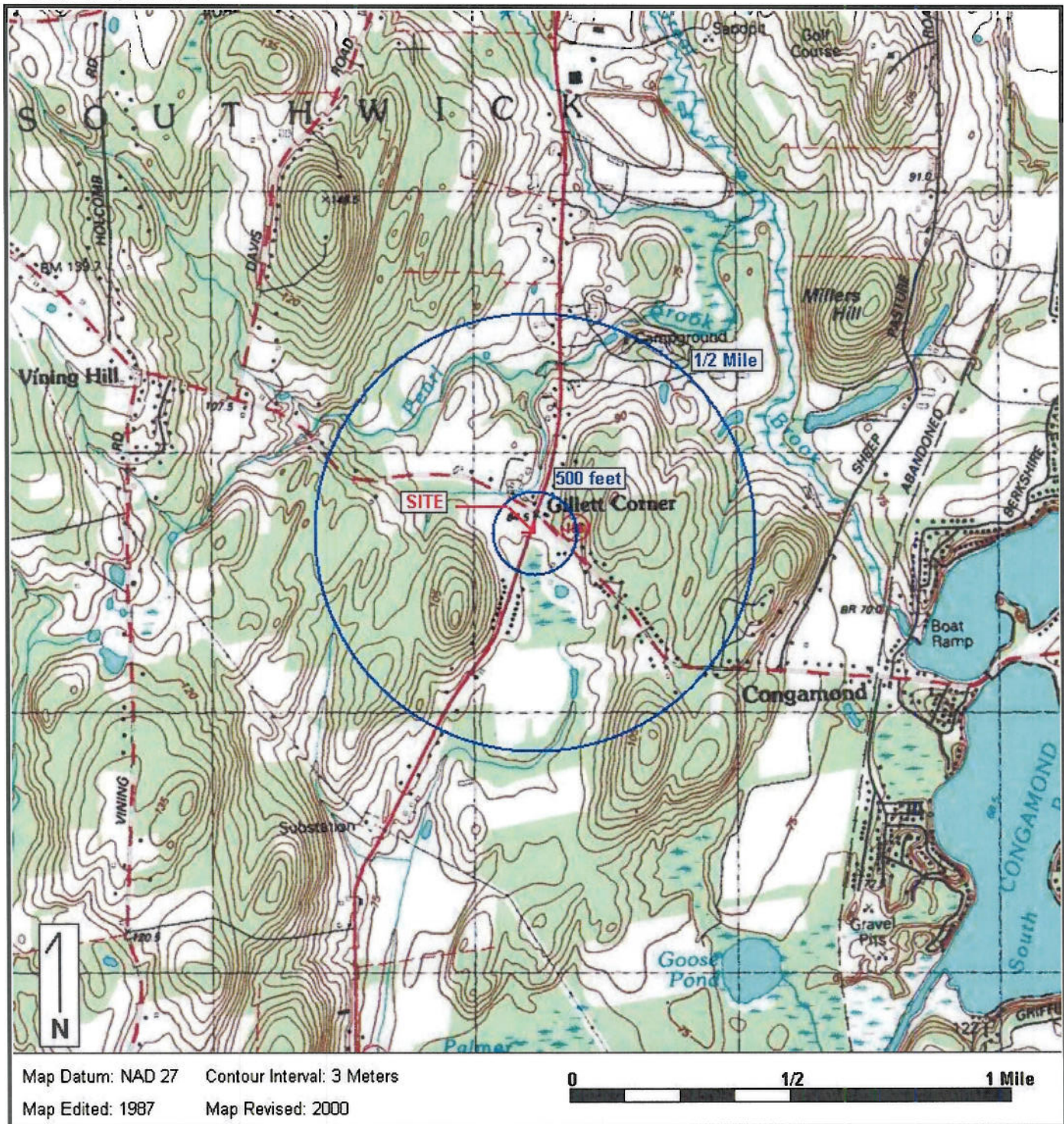
FIGURES



Environmental Compliance Services, Inc.
588 Silver Street
Agawam, MA 01001
Phone 413.789.3530 Fax 413.789.2776
www.ecsconsult.com

Southwick Citgo
198 College Highway
Southwick, MA 01077

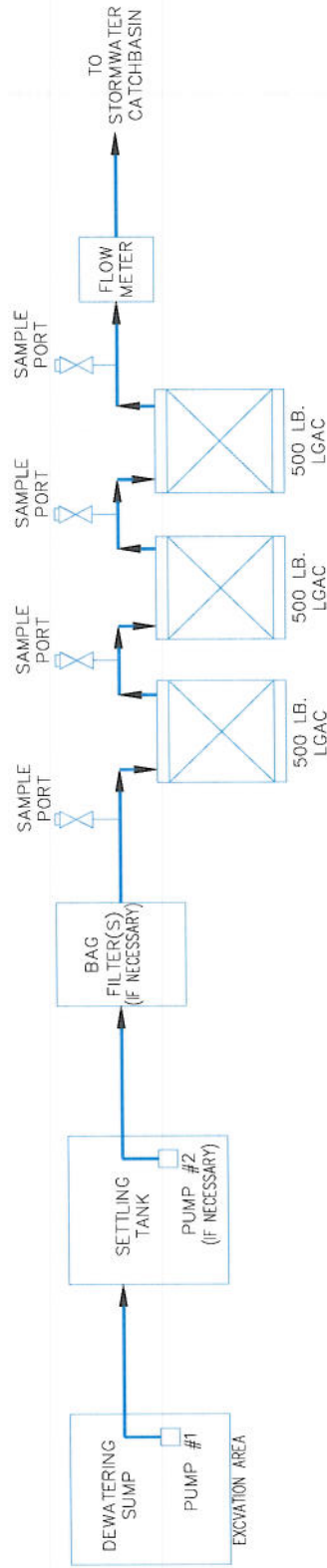
Figure 1: SITE LOCUS



Base Map: U.S. Geological Survey; Quadrangle Location: Southwick, MA

Lat/Lon: 42° 1' 30" NORTH, 72° 47' 11" WEST - UTM Coordinates: 18 683258 EAST / 4654911 NORTH

Generated By: Kevin Collins



GROUNDWATER TREATMENT SYSTEM

Notes:

Pump #2 will not be installed unless required.

Filters will not be installed unless necessary to meet permit requirements.

Discharge flow will be by gravity only unless a pump is required due to field conditions.



CLIENT: **Pride Convenience, Inc.**
 198 College Highway - Routes 10 & 202
 Southwick, Massachusetts
 GRAPHIC SCALE: 1" = 10' (Horizontal), 1" = 10' (Vertical)
 DATE: 9/30/2011

DESIGNED BY:	RSW/RAS	CHECKED BY:	AA	APPROVED BY:	AA
SCALE:	N.T.S.	DATE:	9/30/2011	JOB NO.:	12756
				FIGURE NO.:	3

Groundwater Treatment System

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

Method / Analyte	Units	MW-3		ECS-3	
		Result	RDL	Result	RDL
EPA 1664 Rev. A					
Non-polar material (SGT-HEM)	mg/l	BRL	1	BRL	1
EPA 200.7					
Silver	mg/l	BRL	0.005	BRL	0.005
Arsenic	mg/l	BRL	0.004	0.0782	0.004
Cadmium	mg/l	BRL	0.0025	0.0072	0.0025
Chromium	mg/l	BRL	0.005	BRL	0.005
Copper	mg/l	BRL	0.005	0.0084	0.005
Iron	mg/l	25.9	0.015	178	0.015
Nickel	mg/l	BRL	0.005	BRL	0.1
Lead	mg/l	BRL	0.0075	0.0212	0.0075
Antimony	mg/l	BRL	0.006	BRL	0.006
Selenium	mg/l	BRL	0.015	BRL	0.015
Zinc	mg/l	0.0178	0.005	0.584	0.005
EPA 245.1/7470A					
Mercury	mg/l	BRL	0.0002	BRL	0.0002
EPA 335.4 / SW846 9012A					
Cyanide (total)	mg/l	BRL	0.005	BRL	0.005

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

		MW-3		ECS-3	
Method / Analyte	Units	Result	RDL	Result	RDL
EPA 504.1					
1,2-Dibromoethane (EDB)	µg/l	BRL	0.01	BRL	0.01
EPA 608					
Aroclor-1016	µg/l	BRL	0.220	BRL	0.211
Aroclor-1221	µg/l	BRL	0.220	BRL	0.211
Aroclor-1232	µg/l	BRL	0.220	BRL	0.211
Aroclor-1242	µg/l	BRL	0.220	BRL	0.211
Aroclor-1248	µg/l	BRL	0.220	BRL	0.211
Aroclor-1254	µg/l	BRL	0.220	BRL	0.211
Aroclor-1260	µg/l	BRL	0.220	BRL	0.211
Aroclor-1262	µg/l	BRL	0.220	BRL	0.211
Aroclor-1268	µg/l	BRL	0.220	BRL	0.211
EPA 625					
Acenaphthene	µg/l	BRL	5	BRL	5
Acenaphthylene	µg/l	BRL	5	BRL	5
Aniline	µg/l	BRL	5	BRL	5
Anthracene	µg/l	BRL	5	BRL	5
Azobenzene/Diphenyldiazine	µg/l	BRL	5	BRL	5
Benzidine	µg/l	BRL	5	BRL	5
Benzo (a) anthracene	µg/l	BRL	5	BRL	5
Benzo (a) pyrene	µg/l	BRL	5	BRL	5
Benzo (b) fluoranthene	µg/l	BRL	5	BRL	5
Benzo (g,h,i) perylene	µg/l	BRL	5	BRL	5
Benzo (k) fluoranthene	µg/l	BRL	5	BRL	5

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

MW-3				ECS-3	
Method / Analyte	Units	Result	RDL	Result	RDL
EPA 625 (continued)					
Benzoic acid	µg/l	BRL	5	BRL	5
Benzyl alcohol	µg/l	BRL	5	BRL	5
Bis(2-chloroethoxy)methane	µg/l	BRL	5	BRL	5
Bis(2-chloroethyl)ether	µg/l	BRL	5	BRL	5
Bis(2-chloroisopropyl)ether	µg/l	BRL	5	BRL	5
Bis(2-ethylhexyl)phthalate	µg/l	BRL	5	BRL	5
4-Bromophenyl phenyl ether	µg/l	BRL	5	BRL	5
Butyl benzyl phthalate	µg/l	BRL	5	BRL	5
Carbazole	µg/l	BRL	5	BRL	5
4-Chloro-3-methylphenol	µg/l	BRL	5	BRL	5
4-Chloroaniline	µg/l	BRL	5	BRL	5
2-Chloronaphthalene	µg/l	BRL	5	BRL	5
2-Chlorophenol	µg/l	BRL	5	BRL	5
4-Chlorophenyl phenyl ether	µg/l	BRL	5	BRL	5
Chrysene	µg/l	BRL	5	BRL	5
Dibenzo (a,h) anthracene	µg/l	BRL	5	BRL	5
Dibenzofuran	µg/l	BRL	5	BRL	5
1,2-Dichlorobenzene	µg/l	BRL	5	BRL	5
1,3-Dichlorobenzene	µg/l	BRL	5	BRL	5
1,4-Dichlorobenzene	µg/l	BRL	5	BRL	5
3,3'-Dichlorobenzidine	µg/l	BRL	5	BRL	5
2,4-Dichlorophenol	µg/l	BRL	5	BRL	5
Diethyl phthalate	µg/l	BRL	5	BRL	5
Dimethyl phthalate	µg/l	BRL	5	BRL	5
2,4-Dimethylphenol	µg/l	BRL	5	BRL	5

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

		MW-3		ECS-3	
Method / Analyte	Units	Result	RDL	Result	RDL
EPA 625 (continued)					
Di-n-butyl phthalate	µg/l	BRL	5	BRL	5
4,6-Dinitro-2-methylphenol	µg/l	BRL	5	BRL	5
2,4-Dinitrophenol	µg/l	BRL	5	BRL	5
2,4-Dinitrotoluene	µg/l	BRL	5	BRL	5
2,6-Dinitrotoluene	µg/l	BRL	5	BRL	5
Di-n-octyl phthalate	µg/l	BRL	5	BRL	5
Fluoranthene	µg/l	BRL	5	BRL	5
Fluorene	µg/l	BRL	5	BRL	5
Hexachlorobenzene	µg/l	BRL	5	BRL	5
Hexachlorobutadiene	µg/l	BRL	5	BRL	5
Hexachlorocyclopentadiene	µg/l	BRL	5	BRL	5
Hexachloroethane	µg/l	BRL	5	BRL	5
Indeno (1,2,3-cd) pyrene	µg/l	BRL	5	BRL	5
Isophorone	µg/l	BRL	5	BRL	5
2-Methylnaphthalene	µg/l	BRL	5	BRL	5
2-Methylphenol	µg/l	BRL	5	BRL	5
3 & 4-Methylphenol	µg/l	BRL	10	BRL	10
Naphthalene	µg/l	BRL	5	BRL	5
2-Nitroaniline	µg/l	BRL	5	BRL	5
3-Nitroaniline	µg/l	BRL	5	BRL	5
4-Nitroaniline	µg/l	BRL	5	BRL	5
Nitrobenzene	µg/l	BRL	5	BRL	5
2-Nitrophenol	µg/l	BRL	5	BRL	5

TABLE I
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

Results reported in nanograms per liter (ng/L) or micrograms per liter (µg/L), as noted					
MW-3			ECS-3		
Method / Analyte	Units	Result	RDL	Result	RDL
EPA 625 (continued)					
4-Nitrophenol	µg/l	BRL	5	BRL	5
N-Nitrosodimethylamine	µg/l	BRL	5	BRL	5
N-Nitrosodi-n-propylamine	µg/l	BRL	5	BRL	5
N-Nitrosodiphenylamine	µg/l	BRL	5	BRL	5
Pentachlorophenol	µg/l	BRL	5	BRL	5
Phenanthrene	µg/l	BRL	5	BRL	5
Phenol	µg/l	BRL	5	BRL	5
Pyrene	µg/l	BRL	5	BRL	5
Pyridine	µg/l	BRL	5	BRL	5
1,2,4-Trichlorobenzene	µg/l	BRL	5	BRL	5
2,4,5-Trichlorophenol	µg/l	BRL	5	BRL	5
2,4,6-Trichlorophenol	µg/l	BRL	5	BRL	5
Hach 8167					
Total Residual Chlorine	mg/l	BRL	0.1	BRL	0.1
SM2540D					
Total Suspended Solids	mg/l	31	5	550	50
SW846 7196A/SM3500CrD					
Hexavalent Chromium	mg/l	BRL	0.025	BRL	0.025
EPA 300.0					
Chloride	mg/l	130	10	329	10

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

MW-3			ECS-3		
Method / Analyte	Units	Result	RDL	Result	RDL
SW846 8260C					
1,1,2-Trichlorotrifluoroethane (Freon 113)	µg/l	BRL	1	BRL	5
Acetone	µg/l	BRL	10	BRL	50
Acrylonitrile	µg/l	BRL	0.5	BRL	2.5
Benzene	µg/l	BRL	1	BRL	5
Bromobenzene	µg/l	BRL	1	BRL	5
Bromochloromethane	µg/l	BRL	1	BRL	5
Bromodichloromethane	µg/l	BRL	0.5	BRL	2.5
Bromoform	µg/l	BRL	1	BRL	5
Bromomethane	µg/l	BRL	2	BRL	10
2-Butanone (MEK)	µg/l	BRL	10	BRL	50
n-Butylbenzene	µg/l	BRL	1	BRL	5
sec-Butylbenzene	µg/l	BRL	1	BRL	5
tert-Butylbenzene	µg/l	BRL	1	BRL	5
Carbon disulfide	µg/l	BRL	2	BRL	10
Carbon tetrachloride	µg/l	BRL	1	BRL	5
Chlorobenzene	µg/l	BRL	1	BRL	5
Chloroethane	µg/l	BRL	2	BRL	10
Chloroform	µg/l	BRL	1	BRL	5
Chloromethane	µg/l	BRL	2	BRL	10
2-Chlorotoluene	µg/l	BRL	1	BRL	5
4-Chlorotoluene	µg/l	BRL	1	BRL	5
1,2-Dibromo-3-chloropropane	µg/l	BRL	2	BRL	10
Dibromochloromethane	µg/l	BRL	0.5	BRL	2.5
1,2-Dibromoethane (EDB)	µg/l	BRL	0.5	BRL	2.5

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

Results reported in micrograms per liter (µg/L) or micrograms per liter (µg/L), as noted					
MW-3					
ECS-3					
Method / Analyte	Units	Result	RDL	Result	RDL
SW846 8260C (Continued)					
Dibromomethane	µg/l	BRL	1	BRL	5
1,2-Dichlorobenzene	µg/l	BRL	1	BRL	5
1,3-Dichlorobenzene	µg/l	BRL	1	BRL	5
1,4-Dichlorobenzene	µg/l	BRL	1	BRL	5
Dichlorodifluoromethane (Freon 12)	µg/l	BRL	2	BRL	10
1,1-Dichloroethane	µg/l	BRL	1	BRL	5
1,2-Dichloroethane	µg/l	BRL	1	BRL	5
1,1-Dichloroethene	µg/l	BRL	1	BRL	5
cis-1,2-Dichloroethene	µg/l	BRL	1	BRL	5
trans-1,2-Dichloroethene	µg/l	BRL	1	BRL	5
1,2-Dichloropropane	µg/l	BRL	1	BRL	5
1,3-Dichloropropane	µg/l	BRL	1	BRL	5
2,2-Dichloropropane	µg/l	BRL	1	BRL	5
1,1-Dichloropropene	µg/l	BRL	1	BRL	5
cis-1,3-Dichloropropene	µg/l	BRL	0.5	BRL	2.5
trans-1,3-Dichloropropene	µg/l	BRL	0.5	BRL	2.5
Ethylbenzene	µg/l	1.0	1	6.0	5
Hexachlorobutadiene	µg/l	BRL	0.5	BRL	2.5
2-Hexanone (MBK)	µg/l	BRL	10	BRL	50
Isopropylbenzene	µg/l	1.0	1	5.1	5
4-Isopropyltoluene	µg/l	BRL	1	BRL	5
Methyl tert-butyl ether	µg/l	BRL	1	BRL	5
4-Methyl-2-pentanone (MIBK)	µg/l	BRL	10	BRL	50
Methylene chloride	µg/l	BRL	2	BRL	10

TABLE 1
RESULTS OF ANALYSIS OF GROUNDWATER SAMPLES

Pride Convenience, Inc.
198 College Highway, Southwick, Massachusetts

Results reported in milligrams per liter (mg/L) or micrograms per liter (µg/L), as noted

		MW-3		ECS-3	
Method / Analyte	Units	Result	RDL	Result	RDL
SW846 8260C (Continued)					
Naphthalene	µg/l	BRL	1	6.4	5
n-Propylbenzene	µg/l	2.0	1	15.4	5
Styrene	µg/l	BRL	1	BRL	5
1,1,1,2-Tetrachloroethane	µg/l	BRL	1	BRL	5
1,1,2,2-Tetrachloroethane	µg/l	BRL	0.5	BRL	2.5
Tetrachloroethene	µg/l	BRL	1	BRL	5
Toluene	µg/l	BRL	1	BRL	5
1,2,3-Trichlorobenzene	µg/l	BRL	1	BRL	5
1,2,4-Trichlorobenzene	µg/l	BRL	1	BRL	5
1,3,5-Trichlorobenzene	µg/l	BRL	1	BRL	5
1,1,1-Trichloroethane	µg/l	BRL	1	BRL	5
1,1,2-Trichloroethane	µg/l	BRL	1	BRL	5
Trichloroethene	µg/l	BRL	1	BRL	5
Trichlorofluoromethane (Freon 11)	µg/l	BRL	1	BRL	5
1,2,3-Trichloropropane	µg/l	BRL	1	BRL	5
1,2,4-Trimethylbenzene	µg/l	2.9	1	89.2	5
1,3,5-Trimethylbenzene	µg/l	BRL	1	BRL	5
Vinyl chloride	µg/l	BRL	1	BRL	5
m,p-Xylene	µg/l	3.9	2	10.1	10
o-Xylene	µg/l	BRL	1	BRL	5
Tetrahydrofuran	µg/l	BRL	2	BRL	10
Ethyl ether	µg/l	BRL	1	BRL	5
Tert-amyl methyl ether	µg/l	BRL	1	BRL	5

ATTACHMENT I
NOI FOR THE RGP

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: Pride Station, Southwick		Facility/site mailing address:	
Location of facility/site:	Facility SIC code(s):	Street:	
longitude: 72.7865256	5541	198 College Highway	
latitude: 42.0253865			
b) Name of facility/site owner:		Town: Southwick	
Email address of facility/site owner:		State:	Zip:
tripride@comcast.net		MA	01077
Telephone no. of facility/site owner: (413) 737-6992		County: Hampden	
Fax no. of facility/site owner: (413) 731-5852		Owner is (check one): 1. Federal ☐ 2. State/Tribal ☐	
Address of owner (if different from site):		3. Private ☒ 4. Other ☐ if so, describe:	
Street: 246 Cottage Street			
Town: Springfield	State: MA	Zip: 01104	County: Hampden
c) Legal name of operator:		Operator telephone no: (413) 789-3530	
Environmental Compliance Services, Inc		Operator fax no.: (413) 789-2776	Operator email: dfelten@ecsconsult.com
Operator contact name and title: Abby Albano (Project Manager)/Daniel Felten (Licensed Site Professional)			
Address of operator (if different from owner):		Street: 588 Silver Street	
Town: Agawam	State: MA	Zip: 01001	County: Hampden

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:
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: (Release Tracking Number 1-11532) 2. permit or license # assigned: 3. state agency contact information: name, location, and telephone number: MassDEP, Bureau of Waste Site Cleanup 436 Dwight Street, Suite 5 Springfield, MA 01003	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 ☒

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 ☐
II - Non Petroleum Site Remediation	A. Volatile Organic Compound (VOC) Only Sites ☐ B. VOC Sites with Additional Contamination ☐ C. Primarily Heavy Metal Sites ☐
III - Contaminated Construction Dewatering	A. General Urban Fill Sites ☐ B. Known Contaminated Sites ☒

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) ☐
---------------------------------------	---

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 will be pumped from an underground storage tank excavation in order to allow for the collection of assessment soil samples, removal of petroleum-impacted soils, and to facilitate the removal and installation of new underground storage tanks.	
b) Provide the following information about each discharge:	
1) Number of discharge points: 1	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)? Max. flow: 0.0558 Is maximum flow a design value? Y ☒ N ☐ Average flow (include units): 0.0011 Is average flow a design value or estimate? estimate
3) Latitude and longitude of each discharge within 100 feet:	
pt.1: lat 42.0253865 long 72.7865256	pt.2: lat. long. ;
pt.3: lat. long.	pt.4: lat. long. ;
pt.5: lat. long.	pt.6: lat. long. ;
pt.7: lat. long.	pt.8: lat. long. ; etc.
4) If hydrostatic testing, total volume of the discharge (gals):	5) Is the discharge intermittent ☒ or seasonal ☐ ? Is discharge ongoing? Y ☐ N ☐
c) Expected dates of discharge (mm/dd/yy): start October 15, 2011 end December 1, 2011	
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). Please See Attached.	

3. Contaminant Information.

a) Based on the sub-category selected (See Appendix III), indicated 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	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)			✓	5,000 ug/L	550,000	74.94	290,500	39.58
2. Total Residual Chlorine (TRC)		✓		20 ug/L	ND	NA	ND	NA
3. Total Petroleum Hydrocarbons (TPH)		✓		1,000 ug/L	ND	NA	ND	NA
4. Cyanide (CN)	57125	✓		5 ug/L	ND	NA	ND	NA
5. Benzene (B)	71432	✓		5 ug/L	ND	NA	ND	NA
6. Toluene (T)	108883	✓		5 ug/L	ND	NA	ND	NA
7. Ethylbenzene (E)	100414		✓	5 ug/L	6.0	0.0008	3.5	0.00047
8. (m,p,o) Xylenes (X)	108883; 106423; 95476; 1330207		✓	10 ug/L	10.1	0.00138	7.0	0.00095
9. Total BTEX ²	n/a		✓	10 ug/L	16	0.0022	11	0.001
10. Ethylene Dibromide (EDB) (1,2-dibromoethane) ³	106934	✓		0.01 ug/L	ND	NA	ND	NA
11. Methyl-tert-Butyl Ether (MtBE)	1634044	✓		5 ug/L	ND	NA	ND	NA
12. ter-Butyl Alcohol (TBA) (Tertiary-Butanol)	75650	✓		50 ug/L	ND	NA	ND	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	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
					concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
13. tert-Amyl Methyl Ether (TAME)	9940508	✓		5 ug/L	ND	NA	ND	NA
14. Naphthalene	91203		✓	5 ug/L	6.4	0.00087	3.7	0.00087
15. Carbon Tetrachloride	56235	✓		5 ug/L	ND	NA	ND	NA
16. 1,2 Dichlorobenzene (o-DCB)	95501	✓		5 ug/L	ND	NA	ND	NA
17. 1,3 Dichlorobenzene (m-DCB)	541731	✓		5 ug/L	ND	NA	ND	NA
18. 1,4 Dichlorobenzene (p-DCB)	106467	✓		5 ug/L	ND	NA	ND	NA
18a. Total dichlorobenzene		✓		5 ug/L	ND	NA	ND	NA
19. 1,1 Dichloroethane	75343	✓		5 ug/L	ND	NA	ND	NA
20. 1,2 Dichloroethane	107062	✓		5 ug/L	ND	NA	ND	NA
21. 1,1 Dichloroethene	75354	✓		5 ug/L	ND	NA	ND	NA
22. cis-1,2 Dichloroethene (DCE)	156592	✓		5 ug/L	ND	NA	ND	NA
23. Methylene Chloride	75092	✓		10 ug/L	ND	NA	ND	NA
24. Tetrachloroethene (PCE)	127184	✓		5 ug/L	ND	NA	ND	NA
25. 1,1,1 Trichloroethane (TCA)	71556	✓		5 ug/L	ND	NA	ND	NA
26. 1,1,2-Trichloroethane (TCA)	79005	✓		5 ug/L	ND	NA	ND	NA
27. Trichloroethene (TCE)	790016	✓		5 ug/L	ND	NA	ND	NA

Parameter*	CAS Number	Believed Absent	Believed Present	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	✓		5 ug/L	ND	NA	ND	NA
29. Acetone	67641	✓		50 ug/L	ND	NA	ND	NA
30. 1,4 Dioxane	123911	✓		100 ug/L	ND	NA	ND	NA
31. Total Phenols	108952	✓		5 ug/L	ND	NA	ND	NA
32. Pentachlorophenol (PCP)	87865	✓		5 ug/L	ND	NA	ND	NA
33. Total Phthalates (Phthalate esters)		✓		5 ug/L	ND	NA	ND	NA
34. Bis (2-ethylhexyl) phthalate [di- (ethylhexyl) phthalate]	117817	✓		5 ug/L	ND	NA	ND	NA
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		✓		5 ug/L	ND	NA	ND	NA
a. Benzo(a) Anthracene	56553	✓		5 ug/L	ND	NA	ND	NA
b. Benzo(a) Pyrene	50328	✓		5 ug/L	ND	NA	ND	NA
c. Benzo(b) Fluoranthene	205992	✓		5 ug/L	ND	NA	ND	NA
d. Benzo(k) Fluoranthene	207089	✓		5 ug/L	ND	NA	ND	NA
e. Chrysene	21801	✓		5 ug/L	ND	NA	ND	NA
f. Dibenzo (a,h) anthracene	53703	✓		5 ug/L	ND	NA	ND	NA
g. Indeno (1,2,3-c,d) Pyrene	193395	✓		5 ug/L	ND	NA	ND	NA
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		✓		5 ug/L	ND	NA	ND	NA

Parameter*	CAS Number	Believed Absent	Believed Present	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
					concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
h. Acenaphthene	83329	✓		5 ug/L	ND	NA	ND	NA
i. Acenaphthylene	208968	✓		5 ug/L	ND	NA	ND	NA
j. Anthracene	120127	✓		5 ug/L	ND	NA	ND	NA
k. Benzo(g,h,i) Perylene	191242	✓		5 ug/L	ND	NA	ND	NA
l. Fluoranthene	206440	✓		5 ug/L	ND	NA	ND	NA
m. Fluorene	86737	✓		5 ug/L	ND	NA	ND	NA
n. Naphthalene	91203	✓		5 ug/L	ND	NA	ND	NA
o. Phenanthrene	85018	✓		5 ug/L	ND	NA	ND	NA
p. Pyrene	129000	✓		5 ug/L	ND	NA	ND	NA
37. Total Polychlorinated Biphenyls (PCBs)	85687; 84742; 117840; 84662; 131113; 117817.	✓		0.220 ug/L	ND	NA	ND	NA
38. Chloride	16887006		✓	10,000 ug/L	329,000	44.83	229,500	31.27
39. Antimony	7440360	✓		6 ug/L	ND	NA	ND	NA
40. Arsenic	7440382		✓	4 ug/L	78.2	0.011	41.1	0.006
41. Cadmium	7440439		✓	2.5 ug/L	7.2	0.001	4.85	0.0085
42. Chromium III (trivalent)	16065831	✓		5 ug/L	NA	NA	NA	NA
43. Chromium VI (hexavalent)	18540299	✓		25 ug/L	ND	NA	ND	NA
44. Copper	7440508		✓	5 ug/L	8.4	0.00114	6.7	0.00091
45. Lead	7439921		✓	7.5 ug/L	21.2	0.0029	14.4	0.0020
46. Mercury	7439976	✓		0.2 ug/L	ND	NA	ND	NA
47. Nickel	7440020	✓		5 ug/L	ND	NA	ND	NA
48. Selenium	7782492	✓		15 ug/L	ND	NA	ND	NA
49. Silver	7440224	✓		5 ug/L	ND	NA	ND	NA
50. Zinc	7440666		✓	5 ug/L	584	0.079	300.9	0.041
51. Iron	7439896		✓	15 ug/L	178,000	24.25	101,950	13.89
Other (describe):								

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 ☐		If yes, which metals? Arsenic, Cadmium, Copper, Lead, Zinc and Iron
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?		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:
Metal:	Arsenic DF 9.96 Cadmium DF 9.96 Copper DF 9.96 Lead, zinc and Iron DF 9.96 Etc.	Cadmium, Lead and Iron

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: The system will consist of submersible pumps which will extract groundwater to up to two 21,000-gallon fractionation tanks. Water from the fractionation tanks will be pumped through bag filters and subsequently through up to three 500-pound liquid granular phase activated charcoal (LGAC) filters, prior to discharge to a catch basin located in College Highway.						
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 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):

None planned.

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):
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b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:

Treated water will be discharged to a catch basin in College Highway. The catch basin is connected to storm water lines that discharge to Palmer/Mountain Brooks.

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

1. For multiple discharges, number the discharges sequentially.
2. For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water. The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.

d) Provide the state water quality classification of the receiving water

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

f) Is the receiving water a listed 303(d) water quality impaired or limited water? 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.

Please see the attached letter for supplemental information.

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:	Pride Station, Southwick
Operator signature:	
Printed Name & Title:	Abby Albano, Project Manager
Date:	9/29/2011

ATTACHMENT II

LABORATORY REPORT AND CHAIN OF CUSTODY RECORD

ATTACHMENT III

NHESP 2008 ESTIMATED HABITAT FOR RARE WILDLIFE AND PRIORITY HABITATS FOR STATE-PROTECTED RARE SPECIES MAP

ATTACHMENT IV
MACRIS DATABASE SEARCH RESULTS

Massachusetts Cultural Resource Information System

MACRIS

MACRIS Search Results

Search Criteria: Town(s): Southwick; Street No: 198; Street Name: College Hwy; Resource Type(s): Area, Building, Burial Ground, Object, Structure;

Inv. No.	Property Name	Street	Town	Year
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