UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL RETURN RECEIPT REQUESTED

OCT 03 2014

Keith Decker
Project Director
LAND Remediation
1644 State Route 43
Averhill Park, NY 12018

Jason Naiden
Lead Environmental Engineer
National Grid
40 Sylvan Road
Waltham, MA 02451

Re: Authorization to discharge under the Remediation General Permit (RGP) – MAG910000. Mass Electric Former Athol Manufactured Gas Plant site Located at 51 Electric Street, Athol, MA, Worcester County; Authorization # MAG910643

Dear Mr. Decker and Mr. Naiden:

Based on the review of a Notice of Intent (NOI) submitted by Joseph E. Higgins from Innovative Engineering Solutions, Inc., on behalf of Massachusetts Electric Company d/b/a/ National Grid (National Grid), for the site referenced above, the U.S. Environmental Protection Agency (EPA) hereby authorizes you both as the named Owner and Operator, acting as co-permittees 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 antimony and selenium 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 a dilution factor range (DFR), due to the ample dilution at the point of discharge (108.5) the DFR applicable for this pollutant is

greater than one hundred (>100) established in the RGP. (See the RGP Appendix IV for Massachusetts facilities). Therefore, the limit for antimony of 141 ug/L, copper of 540 ug/L, lead of 132 ug/L, selenium of 408 ug/L, zinc of 1,480 ug/L and iron of 5,000 ug/L, shall not be exceeded in the discharge.

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 11, 2014. 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,

Thelma Murphy

Thelma Murphy, Chief
Storm Water and Construction
Permits Section

Enclosure

cc: Robert Kubit, MassDEP
Douglas A. Walsh Athol, PWD
Joseph E. Higgins, IES, Inc.

2010 Remediation General Permit
Summary of Monitoring Parameters[1]

NPDES Authorization Number:	**MAG910643**
Authorization Issued:	September, 2014
Facility/Site Name:	Mass Electric Former Athol Manufactured Gas Plant (MGP)
Facility/Site Address:	51 Electric Street, Athol, MA01331, Worcester County
	Email address of owner: Jason.naiden@nationalgrid.com
Legal Name of Operator:	LAND Remediation
Operator contact name, title, and Address:	Keith Decker. Project Director 1644 State Route 43, Averill Park, NY 12018
	Email: kad@land-remediation.com
Estimated date of the site's Completion:	December 11, 2014
Category and Sub-Category:	Category II – Non Petroleum Site Remediation. Sub-category B. VOC Sites with Additional Contamination
RGP Termination Date:	September 10, 2015
Receiving Water:	Miller river (Segment M35-04)

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

	Parameter	**Effluent Limit/Method#/ML** (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#160.2/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

	Parameter	Effluent Limit/Method#/ML (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
√	9. Total Benzene, Toluene, Ethyl Benzene, and Xylenes (BTEX) [4]	100 ug/L/ Me#8260C/ ML 2ug/L
	10. Ethylene Dibromide (EDB) (1,2- Dibromoethane)	0.05 ug/l/ Me#8260C/ ML 10ug/L
	11. Methyl-tert-Butyl Ether (MtBE)	70.0 ug/l/Me#8260C/ML 10ug/L
	12.tert-Butyl Alcohol (TBA) (TertiaryButanol)	Monitor Only(ug/L)/Me#8260C/ML 10ug/L
	13. tert-Amyl Methyl Ether (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

	Parameter	Effluent Limit/Method#/ML (All Effluent Limits are shown as Daily Maximum Limit, unless denoted by a **, in that case it will be a Monthly Average Limit)
√	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
√	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/ML5ug/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/ML5ug/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 100 ug/L

	Metal parameter	Total Recoverable MA/Metal Limit H [10] = 50 mg/l CaCO3, Units = ug/l (11/12) Freshwater Limits	Minimum level=ML	
√	39. Antimony	141	ML	10
	40. Arsenic **	10	ML	20
	41. Cadmium **	0.2	ML	10
	42. Chromium III (trivalent) **	48.8	ML	15
	43. Chromium VI (hexavalent) **	11.4	ML	10
√	44. Copper **	520	ML	15
√	45. Lead **	132	ML	20
	46. Mercury **	0.9	ML	02
	47. Nickel **	29	ML	20
√	48. Selenium **	408	ML	20
	49. Silver	1.2	ML	10
√	50. Zinc **	1,480	ML	15
√	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 "Aroclor 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.
[9]Although 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 x 1,000ug/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 x 2 =2,000 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