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received



LETTER OF TRANSMITTAL

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To: Environmental Protection Agency	Date: September 9, 2008
RGP NOI Processing	Project No: 04478-8
Municipal Assistance Unit (CMU)	Re: 620 Washington Street
One Congress Street, Suite 1100	Winchester, Massachusetts
Boston, MA 02114-2023	RTNs 3-24919 & 3-27775

We are sending you the following enclosures:

Quantity	Date	Description
1	08/27/08	Notice of Intent, NPDES Remediation General Permit, Winchester Hospital, 620 Washington Street, Winchester, MA

These are transmitted as checked below:

- For Approval
 For Your Use
 For Review/Comment
 As Requested
 Other

Message:

Copy to: File

Signed: Anne L. Leifer, P.G., LSP

If enclosures are not as noted, kindly notify us at once.



Geotechnical
Environmental and
Water Resources
Engineering

August 27, 2008
Project 04478-8

Environmental Protection Agency
RGP NOI Processing
Municipal Assistance Unit (CMU)
One Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Sir or Madam:

**Re: Notice of Intent
NPDES Remediation General Permit
Winchester Hospital
620 Washington Street
Winchester, Massachusetts**

On behalf of Winchester Hospital (WH), GEI Consultants, Inc. has prepared this Notice of Intent (NOI) for coverage under the National Pollutant Discharge Elimination System (NPDES) Remediation General Permit (RGP), Massachusetts General Permit (MAG910000). This NOI was prepared in accordance with the general requirements of the NPDES RGP under Federal Register, Vol. 70, No. 147, and related guidance documentation provided by the EPA. The completed NOI form is provided in Appendix A.

Site Information

This NOI has been prepared for the management of dewatering operations during construction at 620 Washington Street in Winchester, Massachusetts (the Property; Fig. 1). The Property is bordered by the Aberjona River to the south, Washington Street to the east and by undeveloped land and the Cavalry Cemetery to the north and west (Figs. 1 and 2). WH plans to construct two structures on the Property, an additional office building to the northeast of the existing building and a parking structure to the north of the existing building.

The work will occur within the Massachusetts Department of Environmental Protection (DEP) disposal site tracked under Release Tracking Number (RTN) 3-24919 (the Site). Concentrations of trichloroethene (TCE), extractable petroleum hydrocarbon (EPH), polycyclic aromatic hydrocarbons (PAHs), and metals exceeded the applicable Reportable Concentrations for soil category S-1 (RCS-1), as defined by the Massachusetts Contingency Plan (MCP; 310 CMR 40.0315(2)), and required reporting to the DEP on May 31, 2005. Soil and groundwater management activities that are planned at the Site will be conducted as a Release Abatement Measure (RAM) per the MCP.

Discharge and Receiving Surface Water Information

The water collected during construction dewatering activities is expected to contain naturally occurring metals (such as iron and zinc) and may contain low levels of chlorinated solvents (such

as TCE) as well as low levels of petroleum-related compounds (such as PAHs or petroleum hydrocarbon fractions) and other metals (arsenic and lead.). On May 14, 2008 a GEI representative collected ground water samples from two monitoring wells on the Property (RWG-102 and RWG-104) to assess the proposed influent. Both water samples were analyzed for the parameters required under the NPDES RGP. In addition, the pH of the proposed influent was measured to evaluate existing conditions. The laboratory data reports for these samples are provided in Appendix B. The analytical results indicated the presence of cyanide, metals (iron and zinc) and two chlorinated organic solvents (TCE and cis-1,2-dichloroethene [cis-1,2-DCE]). Although no petroleum hydrocarbons were detected by EPA Method 8100, there is a potential to encounter some petroleum contamination during dewatering based on results from previous soil sampling.

The measured pH of the groundwater at the Property ranged from 6.0 to 7.5 standard units (s.u.). The pH range detected is outside the RGP effluent limit for Massachusetts waters (6.5 to 8.3). Therefore, we request an expanded effluent limit range of 6.0 to 9.0 due to the naturally low pH in groundwater at the Property.

The collected water will be treated to remove suspended solids and, if necessary, volatile organic compounds (VOCs), petroleum-related compounds, and metals prior to discharge via the treatment system shown in the process flow diagram in Fig. 3. The treated water will be discharged to one or more catch basins on the property or via surface piping to the Aberjona River.

Consultation with Federal Services

GEI reviewed online electronic data viewers and databases from the Massachusetts Geographical Information System (MassGIS) and the Massachusetts Division of Fisheries and Wildlife (MassWildlife; Natural Heritage and Endangered Species Program), and the U.S. National Parks Service Natural Historic Places (NPS). Based on this review, neither the Property nor the point where the proposed discharge reaches the receiving surface water body are Areas of Critical Environmental Concern (ACEC), Habitats of Rare Wetland Wildlife, Habitats of Rare Species or Estimated Habitats of Rare Wildlife or listed as a National Historic Place. Based on this information, consultation with federal and/or state officials was deemed not necessary.

Coverage under NPDES RGP

It is our opinion that the proposed discharge is eligible for coverage under the NPDES RGP based on the requirements of the NPDES RGP and our evaluation of the available site-specific information. On behalf of WH, we are requesting coverage under the NPDES RGP for the discharge of recovered water during construction activities to the surface waters of the Aberjona River directly via surface piping or the on-site stormwater drainage system.

The enclosed NOI form provides required information on the general site conditions, discharge, treatment system, receiving water, and consultation with federal services (Appendix A). For this project, WH is the owner and has operational control over the construction plans and specifications, including the ability to make modifications to those plans and specifications. A.J. Martini has been contracted by WH and will direct the personnel responsible for the implementation and day-to-day operations and activities that are necessary to comply with the NPDES RGP, including operation, inspection, monitoring, and reporting.

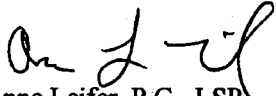
Discharge of treated water is scheduled to begin as early as October 10, 2008, pending authorization from the EPA.

The excavation and dewatering will be conducted as a RAM in accordance with the MCP (310 CMR 40.0000). Therefore, completion and submittal of the DEP Bureau of Resource Protection Water Management (BRP WM) 12 form and fee payment to the Commonwealth of Massachusetts are not required.

Please contact me at 781.721.4066 or aleifer@geiconsultants.com if you have any questions.

Very truly yours,

GEI CONSULTANTS, INC.



Anne Leifer, P.G., LSP
Project Manager

MS/ALL:csh
Enclosures


c: Mr. Melvin Kleckner, Winchester Town Manager
Ms. Jennifer Murphy, Winchester Board of Health
Ms. Elaine Vreeland, Winchester Conservation Commission

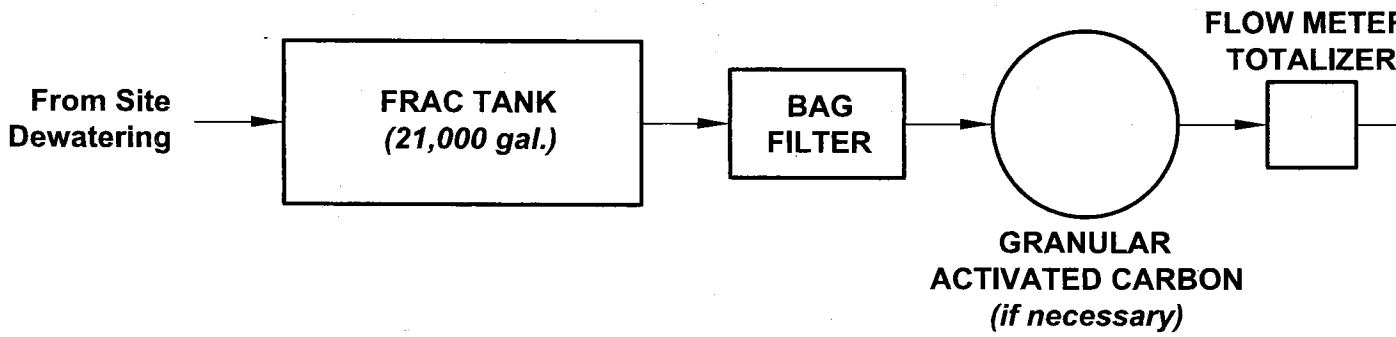


This Image provided by MassGIS is taken from U.S.G.S. Topographic 7.5 X 15 Minute Series Boston North Quadrangle, 1985. Datum is National Geodetic Vertical Datum (NGVD). Contour Interval is 3 Meters.




MASSACHUSETTS QUADRANGLE LOCATION

<p>RGP Notice of Intent 620 Washington Street Winchester, Massachusetts</p>	 <p>GEI Consultants</p>	<p>SITE LOCATION MAP</p>
<p>Winchester Hospital Winchester, Massachusetts</p>	<p>Project 04478-8</p>	<p>August 2008 Fig. 1</p>



PROCESS FLOW DIAGRAM
Not to Scale

RGP Notice of Intent Winchester Hospital Redevelopment 620 Washington Street	 GEI Consultants	PRO
Winchester Hospital Winchester, Massachusetts	Project 04478-8	Augu

Appendix A

**Remediation General Permit
Notice of Intent**

