Five Centennial Drive Peabody, MA 01960-7985 tel: 978-532-1900 fax: 978-977-0100 www.westonandsampson.com

planning, permitting, design, construction, operation, maintenance, design/build, & equipment



Springfield Chapman Valve Weston & Sampson Project No. 2070222.B

January 15, 2008

Bureau of Waste Site Cleanup Department of Environmental protection Western Regional Office 46 Dwight Street, 4<sup>th</sup> Floor Springfield, Massachusetts 01103-1317

Re: Tier II Extension Submittal

Springfield - Chapman Valve Manufacturing Facility

225 Goodwin Street, Springfield, MA

RTN 1-00616

Dear Ms. Caprice Shaw:

In accordance with Sections 310 CMR 40.0560(7) of the Massachusetts Contingency Plan (MCP), Weston & Sampson Engineers, Inc., on behalf of the City of Springfield, has prepared this Tier II Extension Submittal for the above-referenced site release (the Site). The City of Springfield acquired the Site through non-payment of taxes, and as a result, is undertaking voluntary response actions. In accordance with those response actions and letter dated November 8, 2007, the City is not considered a Potentially Responsible Party with liability for response action cost and damages under M.G.L. c 21e. Since the City is electing to conduct response actions voluntarily, the City is not obliged to meet any deadline requirements specified under the MCP. As discussed, the City is submitting this Tier II Extension to bring ht esite into compliance with the MCP.

The supporting documentation provided herein describes the current work status, work completed to date, as well as the specific MCP requirements provided in **bold**, **italics** below.

#### SITE LOCATIONAND DESCRIPTION

The Site is located in an industrial/residential section of Springfield, Massachusetts. A site locus map is included in Figure 1. The Goodwin Street property is a former steel foundry site consisting of an 11.9-acre parcel and a 141,000 square foot, generally rectangular, industrial building.

Foxborough, MA 02035 225 New Boston Street

Woburn, MA 0180

The approximate geographic coordinates for the property are:

**UTM Coordinates:** 

4,669,460 m N

706,640 m E

Latitude/Longitude:

42° 09' 07" N

72° 29' 57" W

A release had occurred from a group of six Underground Storage Tanks (USTs), which were located near the northwest corner of the Site building. The oil release at the Site is listed by the Massachusetts Department of Environmental Protection (DEP) under the name American Dream Modular Homes, RTN 1-0616 and is listed as a confirmed Tier II disposal site. The release of petroleum from the subject underground storage tanks was first reported to the MADEP in January 2001.

A Phase I Report and Tier Classification for the No. 6 fuel oil storage tank release on 225 Goodwin Street was prepared by O'Reilly, Talbot, & Okun Associates, Inc. (OTO) in March 2002. The disposal site score was 133, supporting a Tier II Classification. OTO also conducted several investigations and subsurface explorations between 2000 and 2003 in order to characterize the possible presence, nature, and extent of OHM in soil and groundwater. The investigations included soil borings and monitoring well installation, field screening of soil samples, and laboratory analysis of soil samples and groundwater samples. A Phase II Comprehensive Site Assessment Report/Phase III Remedial Action Plan for the oil release was prepared by OTO in June 2003.

The Goodwin Street property is industrial zoned and is located within a mixed industrial/commercial/residential zoned section of Springfield, Massachusetts (see Figure 1 – Locus Map).

The site building includes a single story manufacturing area and a small two-story office area. The manufacturing portion of the building is a large open space with high ceilings and a concrete slab on grade. At least two small basements are located in the southeast and southwest corners of the manufacturing area. Portions of the structure were damaged by a fire started on the interior of the building. Piles of debris and holes in the ceiling remain from that event. The building is of steel frame construction. Most of the exterior walls are constructed of transite board. The roof has multiple levels and is constructed with an asphalt membrane.

The site abutters consist of: the Truss Engineering Corporation to the east; Goodwin Street followed by vacant land which was formerly part of the Chapman Valve Manufacturing Facility to the north; residential properties to the west; and the former Chapman Valve Casting Sand Landfill to the south.

1. A completed transmittal form using a form provided by the Department for such purposes, which shall include a statement explaining why a Temporary or Permanent Solution has not been achieved for the site.

Copies of the completed transmittal forms BWSC-107 and BWSC-107B are provided in Appendix A. The originals are attached to this letter. As mentioned above, the City acquired this site through non payment of taxes. As such the City is not obliged to meet MCP timelines.

2. A description of the status of response actions including a plan and a proposed schedule for implementing such a plan which details the steps that will be taken in order to achieve, at minimum, a Class C Response Action Outcome at the disposal site pursuant to 310 CMR 40.1000 within one year of the effective date of the Tier II Classification Extension, and a schedule for achieving a Permanent Solution, if feasible;

MCP Compliance History

On January 10, 2001, the City of Springfield submitted a Release Notification form to the DEP regarding a release of petroleum hydrocarbons from underground storage tanks located near the northwest corner of the site building. This notification was based upon subsurface information collected from the Phase II Comprehensive Site Assessment (CSA). The data indicated that petroleum constituents were present in soil adjacent to the underground storage tanks above the RCS-1 reportable standard.

#### Description of the Release

#### Releases of OHM to Soil

Selected soil samples from the soil borings that were performed by O'Reilly, Talbot & Okun Associates, Inc (OTO) were submitted to Amro Environmental Laboratories of Merrimack, New Hampshire for laboratory analysis. Parameters analyzed included Volatile Organic Compounds (VOCs), Extractable and Volatile Petroleum Hydrocarbons (EPH/VPH), Polychlorinated Biphenyls (PCBs), and RCRA-8 metals.

Three chlorinated VOCs, various petroleum constituents (VOCs, VPH, and EPH), one PCB Aroclor, and four metals were detected. Six analytes were detected in at least one soil sample above their respective Reportable Concentration RCS-1 Standard, (1,1-dichloroethene; C<sub>9</sub>-C<sub>10</sub> aromatic hydrocarbons; C<sub>11</sub>-C<sub>22</sub> aromatic hydrocarbons; methylene chloride; 2-methylnapthalene, and benzo(a) anthracene). These analytes were detected in samples from borings EP-1 or EP-4, both of which were located near/between the USTs. Each of these analytes is likely a constituent of petroleum, except 1,1-dichloroethene, which is a chlorinated VOC.

Low levels of chlorinated VOCs have historically been detected in groundwater at the site. C<sub>9</sub>-C<sub>10</sub> aromatic hydrocarbons, C<sub>11</sub>-C<sub>22</sub> aromatic hydrocarbons, 2-methylnapthalene, and benzo(a) anthracene are petroleum constituents that are likely associated with leaks from the tanks. Petroleum stained soils and/or odors were observed at depths of 9 to 17 feet in borings EP-1 and

EP-4, indicating that at least one of the USTs in the area had leaked. As a result of these detections, a Release Notification Form was submitted to MADEP by the City of Springfield in January 2001.

Four near surface soil samples were collected to assess soil quality at other locations on the site. Sample results indicated that there were no detections above MCP reportable concentrations in these soils.

#### Releases of OHM to Groundwater

Groundwater samples were collected by OTO in August 2000 and February 2003 and submitted to Amro Environmental Laboratory for analysis of VOCs by EPA Method 8260, EPH/VPH, and dissolved RCRA-8 metals. Groundwater analytical data indicated that low levels of chlorinated VOCs were reported in three of the wells sampled. Petroleum constituents (VPH and EPH) were identified in groundwater in three locations in the tank vicinity. Two metals (arsenic and barium) were reported in groundwater, but at low concentrations likely due to background geologic conditions.

Acetone was reported in groundwater from four monitoring wells that were installed by Corporate Environmental Advisors, Inc. (CEA). This compound was not detected in any of the wells installed by OTO, even ones in the same vicinity of the site. Based on the absence of a pattern to detection and its presence only in CEA wells, it was believed by OTO that the source of acetone might have been bentonite pellets used during well installation. In the Phase II CSA report, OTO stated that certain brands of coated bentonite pellets have been found to contribute significant concentrations of acetone to groundwater (DEP, 2003). Acetone concentration did not exceed MCP Method 1 Standards

Proposed MCP Response Actions

Weston & Sampson documented potential response actions in a Construction Release Abatement Measure (RAM) Plan, submitted by the City of Springfield to DEP on September 18, 2007. At this time the only response actions that Weston & Sampson anticipate conducting would include excavation of OHM-contaminated soil if encountered, removal of underground storage tanks (USTs), recovery of separate-phase product if encountered in an excavation or monitoring well, and the containment of sudden releases of OHM if they occur. If OHM-contaminated soils are suspected or encountered during construction activities, field-screening and soil sampling will be conducted. Soil samples will be screened every 20 cubic yards (more frequently when staining or other evidence of contamination is observed) for total volatile organic compounds (TVOCs) using a photoionization detector (PID).

Weston & Sampson will collect up to four sidewall and two bottom soil samples from each excavation for confirmatory analyses. Depending on the contaminants suspected and being removed, these samples will be submitted to a state-certified laboratory for analysis of volatile petroleum hydrocarbons/extractable petroleum hydrocarbons (VPH/EPH) with target volatile organic compounds (VOCs) and target polycyclic aromatic compounds (PAHs) using the DEP-approved method (January 1998), metals or PCBs. Sidewall soil samples submitted for laboratory analysis will be representative of the highest PID reading remaining in the excavation.

Soil analytical results from the excavation walls and bottom will be compared to Method 1 Cleanup Standards. If groundwater is encountered in the excavation, the contractor will provide means to dewater the excavation. Contaminated soils will be stockpiled separately from "clean" soils (those soils not anticipated to be OHM-contaminated) based on PID screening readings and visual or olfactory evidence of contamination.

If contaminated soils and/or groundwater are encountered during UST removal activities that constitute a 72-hour release as a result of field-screening readings in excess of 100 ppm in soil, are greater than 2 feet below grade, and within 10 feet of a UST during removal, Weston & Sampson will conduct UST removal activities that will include field screening and soil sampling. If a field-screening reading of 100 ppm or greater is obtained from a soil sample during a tank removal, excavation of soils will be continued. Soils will be field-screened every 20 cubic yards (cy), or when staining is observed, for the presence of total volatile organic compounds (TVOCs) using a photoionization detector (PID).

If separate-phase product is encountered either in an excavation or in a monitoring well at a thickness exceeding 0.5 inches, a 72-hour condition exists and the product will be removed by appropriate methods. If a sudden release of OHM occurs, the appropriate spill response procedure will be implemented.

Because the City obtained the site through non-payment of taxes and is undertaking the response actions voluntarily, the City is not responsible for meeting MCP deadlines.

3. The certification required by 310 CMR 40.0009;

See Transmittal Form BWSC-107, Section G in Appendix A.

4. The certification required by 310 CMR 40.0540(1) (a demonstration of ability and willingness submittal).

See Transmittal Form BWSC-107, Section G in Appendix A.

5. An updated compliance history required by 310 CMR 40.0540(2) since the effective date of the Tier II Classification, or since the Waiver approval date if the disposal site is a Waiver site.

Updated Compliance History is included with Transmittal Form BWSC-107B in Appendix A.

6. An LSP Opinion indicating that the plans and/or reports submitted are in conformance with the requirements of 310 CMR 40.0000.

In submitting this Tier II Extension and signing and stamping the attached BWSC report I am stating that in my professional opinion that this submittal has been completed in conformance with the MCP 310 CMR 40.0560(7).

If you have any questions or need any additional information, please do not hesitate to contact our office at (978) 532-1900.

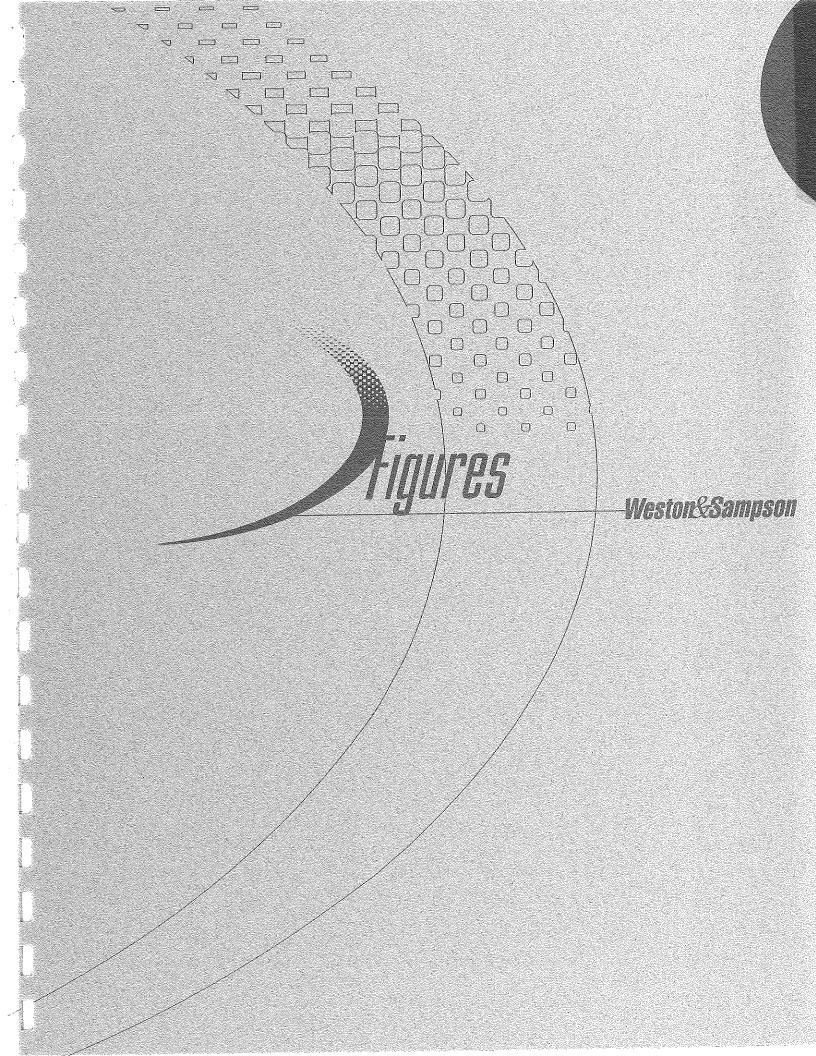
Very truly yours,

WESTON & SAMPSON ENGINEERS, INC.

George D. Naslas, P.G., LSP

Associate

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**Meston&Sampson** 



# Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

### TIER CLASSIFICATION TRANSMITTAL FORM Pursuant to 310 CMR 40.0500 (Subpart E)

BWSC10	7
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Release Tracking Number

	A. DISPOSAL SITE LOCATION:     1. Disposal Site Name: Former Chapman Valve Manufacturing Facility						
	1. Disposal Site Name: Former Chapman valve Mandiactuming Facility						
2	. St	treet Address: 225 Goodwin Street					
3	. Ci	ity/Town: Springfield 4. ZIP Code: 01151-0000					
F	. TI	HIS FORM IS BEING USED TO: (check all that apply)					
		Submit a new Tier Classification Submittal for a Tier I Site, including a Numerical Ranking Scoresheet (BWSC107A) (check one). A Tier I Permit Application must also be submitted.					
		a. Tier IA b. Tier IB c. Tier IC					
		2. Submit a new Tier Classification Submittal for a Tier II Site, including the Numerical Ranking Scoresheet (BWSC107A) and the Tier II Compliance History (BWSC107B).					
		3. Submit a Phase I Completion Statement as per 310 CMR 40.0480.					
l		If previously submitted, provide datemm/dd/yyyy					
		4. Submit a Phase II Scope of Work as per 310 CMR 40.0834.					
		If previously submitted, provide datemm/dd/yyyy					
		5. Submit a Phase II Conceptual Scope of Work supporting a Tier Classification Submittal.					
[	Z	6. Submit a Tier II Extension Submittal for Response Actions at a Tier II Site including the Tier II Compliance History (BWSC107B).					
		7. Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Tier II Site including the Tier II Compliance History (BWSC107B) and the Tier II Transferor Certification (BWSC107C).					
		Proposed effective date of transfer : mm/dd/yyyy					
l		8. Submit a Revised Tier Classification Submittal, including a Numerical Ranking Scoresheet (BWSC107A).  A Major Permit Modification may also need to be submitted.					
		If this revised submittal is re-classifying the site check the new classification.					
		a. Tier IA b. Tier IB c. Tier IC d. Tier II					
		9. Submit a Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site (Primary RTN). Future response actions addressing the Release or Threat of Release notification condition associated with additional Release Tracking Numbers (RTNs) will be conducted as part of the Response Actions planned or ongoing at the Primary Site listed above. For a previously Tier Classified Primary Site, if there is a reasonable likelihood that the addition of the new secondary RTN(s) would change the classification of the site, a <b>Revised Tier Classification Submittal</b> must also be made.					
		Provide Release Tracking Number(s): a b b					
		All future Response Actions must occur according to the deadlines applicable to the Primary RTN. Use only the Primary RTN when making future submittals for this site unless specifically relating to response actions started before the linking occurred.					



### Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

#### **BWSC107**

#### TIER CLASSIFICATION TRANSMITTAL FORM

Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number

#### C. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

- > if Section B of this form indicates that a Tier I or Tier II Classification Submittal including the Numerical Ranking System Scoresheet is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;
- > if Section B of this form indicates that a **Phase I Completion Statement** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;
- > if Section B of this form indicates that a **Phase II Scope of Work** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;
- > if Section B of this form indicates that a **Tier II Extension Submittal** or a **Tier II Transfer Submittal** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #:	
2. First Name: George	3. Last Name: Naslas
4. Telephone: (978) 532-1900 5. Ext.:	2279 6. FAX: (978) 977-0100
7. Signature: 19908  8. Date: 01/11/9008  mm/dd/yyyy	9. LSP Stamp:  9. LSP



# Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

**BWSC107** 

TIER CLASSIFICATION TRANSMITTAL FORM Pursuant to 310 CMR 40.0500 (Subpart E)

Rele	ase	Tracking	Number
1	_	616	

D. PERSON MAKING SUBMITTAL:  1. Check all that apply:   a. change in contact name   b. change of address   c. change in the person undertaking response actions
2. Name of Organization: City of Springfield
3. Contact First Name: David 4. Last Name: Panagore
5. Street: 70 Tapley Street 6. Title: Dir., Planning & Econ. Devel.
7. City/Town: Springfield 8. State: MA 9. ZIP Code: 01104-0000
10. Telephone: (413) 787-6020 11. Ext.: 12. FAX: (413) 787-6524
E. RELATIONSHIP OF PERSON MAKING SUBMITTAL TO DISPOSAL SITE:
1. RP or PRP a. Owner b. Operator c. Generator d. Transporter
e. Other RP or PRP Specify:
2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
4. Any Other Person Making Submittal Specify Relationship:
F. REQUIRED ATTACHMENT AND SUBMITTALS:
Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.
3. Check here to certify that a Legal Notice of a Tier Classification or Re-classification Submittal has been or will be made according to 310 CMR 40.1403, and a copy of the notice sent to DEP, the Chief Municipal Officer and the Local Board of Health.
4. For a Tier II Extension Submittal, check here to certify that a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site is attached.
5. For a Tier II Transfer Submittal, check here to certify that a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions is attached. All Response Actions must be completed by the deadline applicable to the person who first filed either a Tier Classification Submittal for the Disposal Site or received a Waiver of Approvals.
6. Check here if any non-updatable information provided on this form is incorrect, e.g., Site Name or Street Address. Send corrections to the DEP Regional Office.
7. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.

# Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

### **BWSC107**

### TIER CLASSIFICATION TRANSMITTAL FORM Pursuant to 310 CMR 40.0500 (Subpart E)

Release Tracking Number - 616

G. CERTIFICATION OF PERSON MAKING SUBMITTAL:				
1. I, David Panagore * , attest under the pains and penalties of perjury (i) that I have examined and am familiar with the information contained in this submittal, including any and all documents accompanies transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the informaterial information contained in this submittal is, to the best of my knowledge and belief, true, accurate and companies I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. If the property on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.	nation, the plete, and (iii) person or entity to, possible			
If submitting a Tier II Classification, Extension or Transfer, I also attest under the pains and penalties of perjury that person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar or requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site Profess employed or engaged to render Professional Services for the disposal site which is the subject of this Transmittal person(s) or entity(ies) on whose behalf this submittal is made, and my/that person's(s') or entity's(ies') understant estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) leg for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirement 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is that it/they is are unable to proceed with the necessary response actions.	with the sional(s) Form and of the ding as to the al and legal er applicable ally responsible ts in 310 CMR s made learn(s)			
2. By: 3. Title: Dir., Planning & E	con. Devel.			
Signature * acting on behalf of the City, not individually				
4. For: City of Springfield  (Name of person or entity recorded in Section D)  5. Date: 1 1 8 mm/dd/				
(Name of person or entity recorded in Section D)	уууу			
6. Check here if the address of the person providing certification is different from address recorded in Section  7. Street:	1 D.			
8. City/Town: 9. State: 10. ZIP Code:				
11. Telephone: 12. Ext.: 13. FAX:				
YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.				
Date Stamp (DEP USE ONLY):				
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### Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup

#### BWSC107B

TIER II COMPLIANCE HISTORY

Pursuant to 310 CMR 40.0540 (Subpart E)

Release	racking	Numb
1 -	616	

A. DISPOSAL SITE COMPLIANCE HISTORY SU	MMARY:		
Check here if a Tier II Compliance Hist there has been no change in that person's completed.	ory of the person listed in a compliance history. If t	n BWSC107, Section D, was pre his box is checked, this section	eviously submitted, and does not have to be
2. List all permits or licenses that have been in	ssued by the Departmen	t that are relevant to this Dispos	sal Site:
Program	Facility ID		
a. Air Quality	N/A	N/A	N/A
b. Hazardous Waste (M.G.L. c. 21C)	N/A	N/A	N/A
c. Solid Waste	N/A	N/A	11/4
d. Industrial Wastewater Management	NA	N/A	N/A
e. Water Supply	NA	N/A	N/A
f. Water Pollution Control/Surface Water	N/A	N/A	N/A
g. Water Pollution Control/Groundwater	N/A	N/A	N/A
h. Water Pollution Control/Sewer Connection	N/A	NA	N/A.
i. Wetland & Waterways	N/A	N/A	NA
List all other Federal, state or local permits, this Disposal Site:	licenses, certifications, r	registrations, variances, or appro	ovals that are relevant to
Issuing Authority or Program, or Docur	mentation Type	Identification Number	Date Issued mm/dd/yyyy
N/A			
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4. Check here to certify that, if needed, a attached.	statement further descri	bing the Compliance History of t	this Disposal Site is
This statement must describe the compliance history regulations; and (2) other laws for the protection of government agency. Such a statement should identify enforce its requirements including, but not limited to (PAN), Notice of Intent to Take Response Action (NO consent judgements; (4) similar administrative action between the Disposal Site brought on behalf of the DEP or ot action identified, provide the following information: description of noncompliance cited; (3) current status	health, safety, public welfare ify information such as: (1) , a Notice of Noncompliand RA), and an administrative ons taken by other Federal, her Federal, state, or local a (1) name of the Issuing auti	e and the environment administered actions relevant to the Disposal Sit ce (NON), Notice of Intent to Assess enforcement order; (2) administrati state or local agencies; (5) civil or igencies; and (6) any additional rele hority, type of action, identification	d or enforced by any other to taken by the Department to so Civil Administrative Penalty ive consent orders; (3) judicial or criminal actions relevant to evant information. For each

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