

EXhibit 14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES.

NPDES PERMIT NO.: MA0039853

NAME AND ADDRESS OF APPLICANT:

Wayland Business Center LLC
c/o Congress Group Ventures
One Memorial Drive
Cambridge, MA 02142

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Wayland Business Center LLC
430 Boston Post Road
Wayland, MA 01778

RECEIVING WATERS: Wetland to Sudbury River

CLASSIFICATION: B

I. Proposed Action, Type of Facility, and Discharge Location.

The above named applicant has applied to the U.S. Environmental Protection Agency ("EPA") for the issuance of an NPDES permit to discharge into the Sudbury River. The facility is a newly renovated office building which collects and treats sanitary wastewater. The discharge from this secondary treatment facility through Outfall 001 flows through a wetland area and into the Sudbury River.

II. Description of Discharge.

Although the plant has been vacant and inoperable for over two years, the previous owner, the Raytheon Company, was operating the plant within compliance of its NPDES permit.

III. Permit Limitations and Conditions.

The effluent limitations and the monitoring requirements may be found in the draft NPDES permit.

IV. Permit Basis and Explanation of Effluent Limitation Derivation

The Wayland Business Center wastewater treatment facility is a secondary wastewater treatment facility located in Wayland, Massachusetts and is designed to treat up to a daily maximum of 65,000 gallons per day of sanitary wastewater. This facility uses a comminutor, extended aeration and sand filtration. Disinfection is accomplished with an ultraviolet system which is oversized so that it also could function as a back-up system.

Under Section 301(b)(1)(C) of the Clean Water Act (CWA), discharges are subject to effluent limitations based on Water Quality Standards. The Massachusetts Surface Water Quality Standards include the requirements for the regulation and control of toxic constituents and also require that EPA criteria established pursuant to Section 304(a) of the CWA shall be used unless site specific criteria are established. The state will limit or prohibit discharges of pollutants to surface waters to assure that surface water quality standards of the receiving waters are protected and maintained or attained.

Waterbody Classification and Usage

The wetland to the Sudbury River at the point of discharge is classified as a Class B waterbody by the Massachusetts Department of Environmental Protection (MA DEP). Class B waters are designated as a habitat for fish, other aquatic life and wildlife and for primary and secondary contact recreation. Where designated, they shall be suitable as a source of public water supply with appropriate treatment. They shall be suitable for irrigation and other agricultural uses and for compatible industrial cooling and process uses. These waters shall have consistently good aesthetic value.

Conventional Pollutants

Although EPA has not promulgated effluent guidelines for these privately owned treatment plants, the secondary treatment requirements set forth at 40 CFR Part 133 for Publicly Owned Treatment Works (POTWs) will serve as a guide for establishing permit limits for this permit. This rationale is consistent with Best Professional Judgement, as described at Section 401(a)(1) of the Clean Water Act.

Following the rationale above, daily maximum effluent limitations for BOD₅, TSS, Fecal coliform bacteria as well as the pH range are based upon State Certification requirements for POTWs under Section 401(d) of the CWA, 40 CFR 124.53 and 124.55, and water quality considerations.

The wastewater treatment plant will be designed to treat up to 45,000 GPD from the Wayland Business Center. During the life of the permit, consistent with the trading mechanism described later, the facility may treat other sanitary flows from residences and/or businesses which could result in a flow of up to 65,000 GPD which the facility would be able to handle with some upgrades.

The BOD and TSS draft limits were established to be similar to typical secondary treatment requirements. Both parameters have limits of 30 mg/l for monthly average and 50 mg/l for daily maximum. These will be monitored weekly.

Nutrient Limitation

There has been a total phosphorus limit established due to the Sudbury River not currently meeting its instream water quality standard for nutrients. This is a monthly average limit of 0.5 mg/l which is technology-based and consistent with Best Professional Judgement (BPJ) in accordance with section 402(a)(1) of the Clean Water Act and 40 CFR 125.3(c)(2). In addition, the permittee is required to remove from the Sudbury Watershed phosphorus loading from nonpoint sources. Such quantity removed will be three times the quantity discharged from the treatment plant. The limit of 0.5 mg/l, combined with nonpoint source phosphorus reductions in the Watershed, is also consistent with water quality standards. See the watershed trading discussion below which outlines the requirement of phosphorus reductions from other watershed sources.

Aluminum

There has been a monthly monitoring requirement established for total aluminum. The permittee proposes to use some form of alum for solids precipitation and monitoring is intended to evaluate if there are any excess levels of aluminum in the discharge which may cause or contribute to a water quality standards violation.

Bacteria Limitations

The permit includes bacteria limits to ensure that water quality standards are met instream. The Fecal Coliform limits of 200/100 ml and 400/100 ml are consistent with Class B water body requirements of the MA DEP and shall continue to be measured once per week.

Wild & Scenic Rivers Act

This stretch of the Sudbury River is considered an active study segment for consideration to be nominated as a Wild & Scenic River. As such, the EPA is obligated to consult with the National Park Service, the "Service", regarding this permit under Section 7B of the Wild & Scenic Rivers Act. In its review, the Service will conclude whether or not this discharge has a direct and adverse impact on the river's free flowing status or the values that are significant along this stretch of the river. If the Service determines an impact, it may recommend changes to the permit in order to alleviate or eliminate the impact.

Watershed Trading

The Sudbury River Watershed has been identified as not meeting its instream standard for eutrophication. The Watershed is delineated in Attachment A of this Fact Sheet and is comprised of the Sudbury River and its tributaries. According to the Massachusetts Water Quality standards at 314 CMR 4.00, "surface waters shall not exceed the site-specific limits necessary to control accelerated or cultural eutrophication." According to the Final Water Resource Study of the Sudbury, Assabet and Concord Rivers, (4/21/94, Goldman Environmental Consultants) "total phosphorus and ortho-phosphorus ... appear to be by far the most significant problems with regard to water quality. Tallying all the values for total phosphorus reveals that 95% of them exceed the upper limit for a eutrophic classification... Algal blooms and abundant levels of aquatic weeds are manifestations of this phenomenon in the study area."

The permittee has completed an evaluation of alternatives to discharging to the Sudbury River and has concluded that there is no other feasible alternative. The main alternative considered was an on-site groundwater discharge. This was deemed infeasible due to a high water table in the area.

EPA and the MADEP have determined that phosphorus loading from the discharge of sanitary wastewater will be authorized, but that the permittee must also implement a watershed based point/nonpoint source phosphorus trade. Although trading between 2 or more point sources can be treated as a 1:1 exchange, trading between a point source and one or more nonpoint sources is not that direct, because there is some uncertainty associated with nonpoint source pollutant reductions. For this reason, there is normally an exchange rate between these two types of sources. The rate chosen for this permit is 3:1.

The permittee shall design and implement nonpoint source phosphorus reduction which abates three times the phosphorus loading directly discharged through Outfall 001. In other words, for every pound of phosphorus which the permittee discharges, it must eliminate at least three (3) pounds of phosphorus from other sources in the vicinity that would have otherwise been discharged to the Sudbury Watershed. See Attachment B for a calculation regarding phosphorus loading and the 3:1 trading ratio.

The permittee must evaluate where else in the watershed it can reduce the phosphorus loading to the Sudbury Watershed as specified above. Many failing septic systems have been identified in the area and this shall be the first means of reducing nonpoint source phosphorus that the permittee will evaluate. The permittee has agreed to work with the Town of Wayland to tie the sanitary flows of local businesses and/or residences to its treatment system. It is anticipated that, if the permittee reaches the necessary agreements with the town, EPA and the MADEP will transfer the permit to the Town of Wayland, as the new owner and operator of the treatment plant.

If, however, the permittee determines that this mechanism is unlikely to work, the permittee is required to achieve the phosphorus reduction through other means, such as payment to public and/or private entities to implement upgrades to failing septic systems within the Watershed, harvesting of plants or other phosphorus releasing materials from the Watershed, conducting public education, undertaking storm water management, or other proposals.

The trading agreement or mechanism chosen must include a "reasonable assurance" that all parties will implement the conditions of the trade. Although the point source discharge regulated by this permit has reasonable assurance due to its requirements and compliance capability of the EPA and the MADEP, nonpoint source pollution may not have a similar assurance. When developing the trading mechanism, the permittee shall assure that proposed controls are technically feasible and that appropriate local, state or federal agencies have a reasonable expectation that a nonpoint source will implement specified controls.

The draft permit specifies that within three (3) months after the effective date of the permit, the permittee shall submit for approval by EPA and MADEP, a preliminary plan and a description of a mechanism by which it will work with local entities to achieve the phosphorus reductions. This could be through a contract, memorandum of agreement or similar measure. Within twelve (12) months after the effective date of the permit, the permittee must submit a final draft plan and schedule for implementation, and must initiate implementation of the plan within sixty (60) days of its approval by EPA and MADEP. Within twelve (12) months of final approval of the plan, the permittee must submit an executed agreement with the necessary private and/or public parties for implementation of the plan. The permit requires the permittee to report annually on its progress. The required reduction of nonpoint source phosphorus loadings must be achieved no later than five (5) years after the effective date of the permit.

Optimization Study

The permit requires that the permittee conduct an optimization study of its wastewater treatment plant to maximize phosphorus removal. The permit specifies the contents of this study and the time schedule required for its completion, and requires that the permittee operate the plant in accordance with the findings of the study.

Instream Monitoring Program

The permit requires annual monitoring by the permittee to assess the nutrient levels upstream and downstream of the proposed discharge. This monitoring will be seasonal and its results will be submitted in the annual report on the watershed-based trading efforts discussed earlier.

Whole Effluent Toxicity

National studies conducted by the Environmental Protection Agency have demonstrated that domestic sources contribute toxic constituents to POTWs. These constituents include metals, chlorinated solvents and aromatic hydrocarbons among others. The Region's current policy is to include toxicity testing requirements in all municipal permits, while Section 101(a)(3) of the CWA specifically prohibits the discharge of toxic pollutants in toxic amounts.

Based on the potential for toxicity resulting from domestic and industrial contributions, and in accordance with EPA regulation and policy, the draft permit includes acute toxicity limitations and monitoring requirements. (See, e.g., "Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants", 50 Fed. Reg. 30,784 (July 24, 1985); see also, EPA's Technical Support Document for Water Quality-Based Toxics Control). EPA Region I has developed a toxicity control policy. The policy requires wastewater treatment facilities to perform toxicity bioassays on their effluents. The Commonwealth of MA DEP requires bioassay toxicity testing for state certification.

The principal advantages of biological techniques are: (1) the effects of complex discharges of many known and unknown constituents can be measured only by biological analyses; (2) bioavailability of pollutants after discharge is best measured by toxicity testing including any synergistic effects of pollutants; and (3) pollutants for which there are inadequate chemical analytical methods or criteria can be addressed. Therefore, toxicity testing is being used in conjunction with pollutant specific control procedures to control the discharge of toxic pollutants.

Although this is not a POTW, the toxicity testing guidance is being applied here based on Best Professional Judgement. The draft permit requires that the permittee conduct one WET test per year for Outfall 001. This test shall be conducted each October and includes the use of daphnids and fathead minnows in accordance with EPA Region I protocol found in Permit Attachment A.

Antidegradation

The MA DEP has determined, following its antidegradation implementation protocol, that this discharge will result in an insignificant lowering of water quality. Pursuant to the State's antidegradation review policy, the State has found that there is no alternative to this surface water discharge. Further, the State has tentatively determined that all existing water uses will be fully protected.

The State's conclusion is subject to public notice and review before becoming final. The Public Notice is written to serve both as the permit public notice and the notice for the DEPs antidegradation review. Public comments received on the antidegradation finding will be responded to by MADEP and EPA.

V. Sewage Sludge Information and Requirements

The Wayland Business Center does not know the amount of sludge it will generate until the plant has been in operation for a while. Once the sludge is generated and the typical quality known, the permittee will then determine the appropriate treatment or disposal which it will undertake.

In February of 1993, the Environmental Protection Agency (EPA) promulgated standards for the use and disposal of sewage sludge. The regulations were promulgated under the authority of §405(d) of the Clean Water Act (CWA). Section 405(f) of the CWA requires that these regulations be implemented through permits. This permit is intended to implement the requirements set forth in the technical standards for the use and disposal of sewage sludge, commonly referred to as the Part 503 regulations.

Section 405(d) of the CWA requires that sludge conditions be included in all municipal permits. The sludge conditions in the draft permit satisfy this requirement and are taken from EPA's proposed Standards for the Disposal of Sewage Sludge to be codified at 40 CFR Part 503 (February 19, 1993 - Volume 58, pp 9248-9415). These conditions are outlined on Page 8 of the draft permit.

VI. State Certification Requirements

EPA may not issue a permit unless the Massachusetts Department of Environmental Protection certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Department of Environmental Protection has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State pursuant to 40 CFR 124.53 and expects that the draft permit will be certified.

ATTACHMENT B

Watershed Trading Calculation

Phosphorus load of proposed point source discharge
at 0.5 mg/l:

$$\begin{array}{rcccl} (0.5 \text{ mg/l}) & (0.03 \text{ MGD}) & (8.33) & = & 0.125 \text{ lbs/day} \\ & \text{Average Flow} & \text{Conversion} & & \\ & \text{Wayland Business} & \text{Factor} & & \\ & \text{Center} & & & \end{array}$$

At trading ratio of 3:1, amount of phosphorus that
permittee must remove from the watershed:

$$3 (0.125) = 0.375 \text{ lbs/day}$$

Calculation of Nonpoint Source Wastewater Flow Which
Must be Treated to Achieve Above Trading Target:

Assuming that typical effluent level of phosphorus
from other wastewater sources is 10 mg/l, solving for
the approximate nonpoint source flow, X, which should
be treated for phosphorus removal. Since treatment would
result in effluent phosphorus of 0.5 mg/l, credit is
given for 9.5 mg/l removed:

$$(X \text{ MGD}) (9.5 \text{ mg/l}) (8.33) = 0.375 \text{ lbs/day}$$

$$X = 4740 \text{ gallons per day (0.004740 MGD)}$$

If the permittee chooses another alternative to achieve
the phosphorus reduction trade which does not involve tying
in any failing septic systems to its treatment plant, then
the permitted flow limit will be 45,000 GPD.

Response to Public Comments

From May 8, 1998 to June 6, 1998, the United States Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (DEP) solicited Public Comments on a draft NPDES permit, developed pursuant to an application from the Wayland Business Center, MA0039853, for issuance of a permit to discharge wastewater through a wetland to the Sudbury River. After a review of the comments received, EPA has made a final decision to issue the permit authorizing the discharge. The following response to comments describes the changes that have been made to the permit from the draft and the reasons for these changes and briefly describes and responds to the comments on the draft permit. A copy of the final permit may be obtained by writing or calling EPA Planning and Administration (SPA), JFK Federal Building, Boston, MA 02203; Telephone: (617) 565-4424.

UPDATE: On June 4, 1998, the Town of Wayland voted at a Special Town Meeting to take over this wastewater treatment plant by eminent domain. This will result in this treatment plant being operated as a publicly owned facility. Therefore, it is expected that during the life of this permit, the permit and all of its requirements will be transferred from the Wayland Business Center to the Town of Wayland.

A) Comments submitted by The Town of Wayland on 6/1/98:

Comment #1: Although phosphorus is the element of primary concern in the draft permit, nitrogen and other substances should be considered as affecting the watershed and the groundwater when septic systems lack appropriate separation from groundwater.

Response: The draft and final permits contain instream monitoring requirements for several parameters, including nitrogen. These parameters will be monitored monthly between May and November, upstream and downstream of the proposed outfall. If elevated levels of one or more parameters indicate a water quality concern, this permit may be modified to incorporate additional permit limits or requirements.

Comment #2: If the permitted flow is 65,000 gallons per day (gpd), then the septic tie-in minimum should be 20,000 gpd. If the minimum septic tie-in is 4740 gpd, then the total permitted flow should be 49,740 gpd. The Town prefers the former as it will provide the greater benefit to water resources.

Response: The figure of 4740 gpd was an estimate of the minimum septic tie-in flow that would be required in order to meet the proposed watershed trade. Since the maximum design flow as determined by the DEP for this plant was 65,000 gpd, this was chosen as the maximum permitted flow. EPA realizes that there is the potential to tie in more than

the 4740 gpd, up to a maximum of 20,000 GPD. We do not want to limit the number of tie-ins by imposing a maximum flow limit below that for which the plant is designed, or which makes the sewerage option impracticable.

For this ecosystem, EPA and the MA DEP believe there is greater benefit associated with the tie-ins of failing or inadequate septic systems than with the continued operation of such systems, because of the increased treatment to be provided by the treatment plant and the resulting nonpoint source reduction of nutrients to the Sudbury River. It is important to note that the environmental benefit assessment for treatment plants versus septic system management is a case by case determination, based on factors including significance of existing and projected point source and nonpoint source loadings.

Comment #3: The permit allows the payment to public or private parties for addressing failing septic systems. The Town feels that the words "or private" should be stricken. Payment should be to the Town for use by its Board of Health with priority given to business properties.

Response: The requirement for payment to public or private parties to implement upgrades to failing septic systems is a component of an alternative plan only if implementation of the "Sewer Connection Option" cannot be assured. Based on recent information, EPA and MA DEP are strongly assured that the "Sewer Connection Option" will be the preferred option. However, if the alternative plan must be implemented, then EPA and MA DEP believe that the performance standard to be achieved is the upgrade of failing septic systems and resulting nonpoint source nutrient reduction and not whether the recipients are private or public. Accordingly, the permit shall remain unchanged. The permittee may, at its discretion, choose to provide payment to the Board of Health as a means of complying with this requirement.

Comment #4: We question the effectiveness of the plant harvesting and education proposals in the stated objective of reducing the amount of phosphorus being discharged.

Response: Decaying vegetative matter does release nutrients. Harvesting of nuisance plants has been performed for many years by the Hop Brook Watershed Association. EPA and MA DEP believe that similar activities in the Sudbury River and quantification of the associated nonpoint source nutrient reduction can be performed. The educational component is viewed as supporting the funding portion of the alternative watershed trading option. While EPA strongly believes in the importance of education, particularly in the case of nonpoint source pollution, we acknowledge the difficulty of quantifying

its effectiveness in pollution reduction. The permit has been modified to delete educational efforts as a plan component. Alternatively, EPA encourages all parties to voluntarily work together on outreach activities on behalf of the water the resources.

Comment #5: The Town believes that the permit should require the applicant to have a retention basin with an oil/water separator to service its parking lots and driveways regardless of other provisions of the permit.

Response: Storm water runoff from parking lots which does not come into contact with any raw material, finished product, or any waste materials would not usually require permitting. However, this permit could impose Best Management Practices (BMPs) or a Storm Water Pollution Prevention Plan requirement if it was believed that runoff from the parking lot areas could cause or contribute to water quality violations. During construction or re-development of the parking lots and associated areas, we would expect the permittee to conform to the policy of the MA DEP titled "Performance Standards and Guidelines for Storm Water Management". The Town could have jurisdiction for imposing requirements of this guidance through its Conservation Commission.

Comment #6: The Wayland Board of Health has a regulation with specific requirements for the operation and maintenance of wastewater treatment plants and reserves the right to make periodic inspections of any wastewater treatment plant in Town. The final permit should contain a condition that the applicant will comply with all applicable Wayland Board of Health regulations.

Response: This is handled separately by the Town and we expect the permittee to comply with all applicable requirements as long as it is the owner and operator of the plant.

B) Comments submitted by The Town of Wayland's Board of Health on 6/1/98:

Comment #1: We want the applicant to be obligated through the final permit to comply with all applicable Wayland BOH regulations including sending us copies of all reports.

Response: See response to Comment A.6. Copies of all NPDES monitoring reports would be available upon request from the EPA or the MA DEP.

Comment #2: An applicant proposing new construction on lots or increased flows from existing lots should be able to meet Title 5, i.e. construct a subsurface waste disposal system on the property it serves before the parcel can be developed. This should be incorporated into the permit.

Response: The intent of the watershed trade, as described in the permit is to offset (at a 1:3 ratio) the point source phosphorus loading from the permittee's facility by the reduction of nonpoint sources that would have otherwise been released to the Watershed. In order to clarify the above, the permit has been modified to state that "existing" failing septic systems shall be used to meet the trade. Furthermore, Town officials have assured EPA that there are more than enough "existing" failing septic systems to satisfy the trade in the "Sewer Connection Option".

C) Comments submitted by Sarah R. Newbury on 6/3/98:

Comment #1: To Part I(A)(4)(c)(I) I would add "if first approved by the Wastewater Management District Commission" following the words "or private".

Response: See response to Comment A.3.

Comment #2: In connection with existing and post discharge sampling locations described in Part I(A)(6), please note that there are two private golf courses within the floodplain of the Sudbury River in Wayland. At least one of these to my knowledge uses heavy amounts of fertilizers and pesticides; presumably both contribute phosphorus as well as nitrogen. One of these golf courses is adjacent to the former Raytheon property and one is upstream.

Response: EPA and the MA DEP will take these factors into consideration when reviewing the applicant's upstream and downstream sampling locations. We would support and encourage the permittee and the Town to specifically target these two golf courses for education regarding the application of pesticides and fertilizers and their potential impacts to nearby streams via runoff or groundwater migration.

D) Comments submitted by SuAsCo Watershed Coalition on 6/5/98:

Comment #1: The SuAsCo Watershed Coalition would like to request a public hearing to be held on this draft permit. This permit has significant implications on both the ecology and economy of this region and warrants every opportunity for public involvement.

Response: As explained in the August 5, 1998 letter from Linda Murphy (EPA) to Nancy Bryant of the Coalition, EPA determined that significant public interest in a public hearing was not evident and that a public hearing was not advisable for this permit. EPA feels that all the commenters on this permit had their opportunity to voice their concerns and that this document and the final permit will reflect all these comments. Since it appears that the Town will take over the treatment plant in the near future, this will assure that the septic system tie-ins will occur. This will directly address public health and water quality concerns which had previously been difficult to mitigate.

Comment #2: The Sudbury River does not presently meet its federal water quality standards and we are concerned with the total phosphorus limit of 0.5 mg/l. Since there are technologies that can achieve lesser limits, such technologies should be adopted on this highly eutrophic river.

Response: EPA and MA DEP believe that, for this case, a phosphorus limit of 0.5 mg/l will be protective of the Sudbury River for the following reasons:

- a. This permitted discharge represents a significant reduction over phosphorus point source loadings from the previous operator, the Raytheon Company. The 0.5 mg/l effluent level represents about an 80% reduction over previous loadings;
- b. The point source phosphorus loading is relatively minor: an estimated daily maximum phosphorus loading of 0.22 pounds per day with reasonable assurance that this loading can be offset through watershed trading;
- c. The permittee will conduct an optimization study of the treatment plant and implement the findings in order to further remove phosphorus through the treatment process.

Finally and most importantly, EPA and MA DEP decided on this limit only because this permit contains a watershed trading requirement which will result in a net decrease of phosphorus entering this watershed during the life of the permit.

Comment #3: Given the uncertainties regarding nutrient loading and the lack of a current TMDL study, it may also be warranted to set permit limits for nitrogen. A determination of the nitrogen/phosphorus balance in the river should be made before finalizing this permit.

Response: Nitrogen will be monitored upstream and downstream of this proposed discharge between May and November. If it is found that nitrogen is the limiting nutrient in the area of the discharge, the permit may be modified to include additional nitrogen monitoring or limits.

Comment #4: The watershed trading scenario in the permit lacks specific detail and allows an implementation scheme that may not be achieved until five years after the onset of this discharge. We believe this timetable is unreasonably lenient and lacks the specific guidance and planning required for successful implementation of this innovative technique.

Response: There are several steps to developing the watershed trade outlined in the permit which are conditioned upon approval by EPA and the DEP. The mechanism is not specific in order to give the permittee flexibility in developing a trade and being able to assure that it will happen. The watershed trading requirement has been shortened from 5 years after the permit's effective date down to two (2) years after the effective date. This period was shortened due to assurances from the Town, that upon taking over ownership and operation of this treatment plant, that it will proceed quickly to meet the conditions of the trade.

Comment #5: The Coalition is also concerned about the potential impacts this discharge may have on the Wild and Scenic values of the Sudbury River. The antidegradation clause of the permit is compromised by qualifiers such as "tentatively" and "insignificant".

Response: The MA DEP has determined that all of the existing water uses will be fully protected as a result of this discharge. The terms "insignificant" and "significant" are often used in making these determinations. These terms and their application are further explained in the Massachusetts Antidegradation Policy.

Comment #6: The ownership and location of the plant pose a potential for increased residential development in Wayland, beyond what the land could presently accommodate under Title 5 standards.

Response: See response to Comment B.2.

E) Comments submitted by The National Park Service (United States Department of the Interior) on 6/5/98:

This proposed discharge is into a segment of the Sudbury River which is currently subject to a Congressionally authorized wild and scenic study, pursuant to P.L. 101-628. Any federally licensed water resources projects, such as this permit, must be reviewed under Section (7)(b) of the Wild and Scenic Rivers Act to determine whether the proposed project would have direct and adverse effects on the river's free flowing character, or on the values that make it eligible for inclusion in the National Wild and Scenic River system. The NPS has determined that the proposed discharge's impacts on the river will not be "direct and adverse" as long as the following conditions are included:

Comment #1: The "sewer connection option" should be required to be pursued by the Town of Wayland, in the event it becomes an assignee of the permit.

Response: Although the final permit will retain the two different scenarios for meeting the watershed trade, the Town has acknowledged that it has every intention of pursuing the sewer connection option to meet the watershed trade. This is clearly the preferable alternative and the most direct way to alleviate the nutrient flow to the Sudbury River from failing or inadequately operating septic systems.

Comment #2: The nutrient trading standard and implementation schedule must ensure that there is no net cumulative increase in phosphorus loading at the end of the first five year period. Under the schedule set forth in the permit, it appears that the permittee could discharge up to 0.125 lbs/day of phosphorus every day for the first five years and only start eliminating 0.375 lbs/day on the final day of that period.

Response: The Town, assuming it will take over ownership and operation of the plant, appears to be ready to fulfill the requirements of this trade much sooner than the entire five year period, possibly within two years. The final permit will require that the permittee comply with a two year schedule rather than the five years to meet the trade, as the draft permit had allowed. This proposal will be made within ninety days after the effective date of this permit as described on Page 5 of the final permit.

Comment #3: The NPS encourages EPA to require the permittee to achieve as much of the nutrient trading requirement as is feasible through the elimination of existing land based sources of phosphorus. This will help to ensure that baseline phosphorus loadings do not increase in order to meet the resource protection goals created by the river's wild and scenic status.

Response: EPA and the MA DEP agree that the land based sources of phosphorus should be mitigated, because this seems to be the most direct way of reducing phosphorus loadings to the watershed. The second watershed trade option was offered for the applicant in case it would not be able to reach an agreement with the Town of Wayland on how to tie in septic systems to its' treatment plant. Since it appears that the Town will be taking over the plant, it was mentioned before that the septic system tie-ins seem to be assured.

Comment #4: EPA should consider adding seasonal limitations on phosphorus if the need for this is established as a result of the monitoring program. Also, if N:P (nitrogen:phosphorus) ratios indicate that N is limiting, EPA should examine the need for a discharge limitation for nitrogen and/or non-point source reduction for this nutrient.

Response: As was mentioned earlier, nutrient and nutrient ratio information is limited. As we gather information through this permit and other modeling or load allocation efforts, we could modify the permit as necessary to include additional nutrient monitoring or limits and/or trading to include other nutrients.

Comment #5: NPS strongly encourages EPA to consider using this opportunity to pilot removal technologies such as membrane separation in the basin.

Response: Piloting of new technologies is not a goal of the NPDES Program through the issuance of permits. However, EPA does encourage the piloting and use of innovative technologies through its' Office of Research and Development (ORD) and its' Center for Environmental Industry and Technology (CEIT). This EPA Regional office has been in contact with these programs regarding innovative technologies relative to the Hop Brook and Assabet Watersheds, concerning phosphorus treatment technologies.

F) Comments submitted by the Town of Wayland's Conservation Commission on 6/3/98:

Comment #1: We vote to support the points noted in the letter drafted by the (Town of Wayland) Wastewater Management District Commission and the Chair of the Board of Selectmen.

Response: These comments were addressed above in Part A.

G) Comments submitted by Michael J. Fleming, The SUASCO Watershed Team Leader of the Massachusetts DEP on 6/10/98: (After the close of the comment period.)

Comment #1: The permit's phosphorus limit should be reduced to 0.2 mg/l. The DEP is moving forward with future limitations of 0.2 mg/l and this facility should look to new technologies to achieve this standard.

Response: The rationale for the final permit limit is 0.5 mg/l was described earlier. This permit has included conditions that will ensure a decreased impact of nutrient loading through the watershed trading and the optimization study to be conducted. See response to Comment D.2.

Comment #2: Sampling for total phosphorus and oxygen above and below the discharge should be included in the final permit. The inclusion of this condition would provide data needed for future permitting.

Response: Instream phosphorus sampling will be conducted as required in the draft permit. In addition, the permit has been changed to include dissolved oxygen monitoring, which is a good indicator of eutrophication. Dissolved oxygen will be monitored during the months of June, July and August of each year. In these months, DO will be sampled three days per week, with two samples on each of these three days, taken in the early morning and late afternoon.

Comment #3: The watershed trading scenario in the permit is inadequate as it allows for deferred trading for five years after the onset of the discharge.

Response: See response to Comment E.2.

Comment #4: The permit should include quantifiable measures and definite assurances that protect the values of the Sudbury River in the ongoing pursuit of the "Wild and Scenic" designation.

Response: Under Section E, The National Park Service would not expect direct and adverse effects by this discharge as long as its' particular concerns were addressed. These concerns are discussed in Section E.

MA 0039853

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Clean Water Act as amended, (33 U.S.C. §§1251 et seq.; the "CWA", and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§26-53),

Town of Wayland,

is authorized to discharge from a facility located at

430 Boston Post Road
Wayland, MA 01778

to receiving waters named

Wetland to the Sudbury River

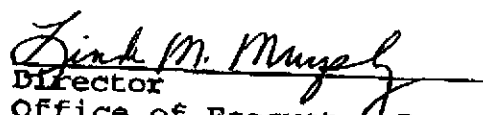
in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.


This permit shall become effective thirty (30) days after the date of signature.

This permit and the authorization to discharge expire at midnight, five (5) years from the effective date.

This permit consists of 9 pages and Attachment A in Part I, including effluent limitations, monitoring requirements, etc., and 35 pages in Part II including General Conditions and Definitions.


Signed this 4th day of September, 1995

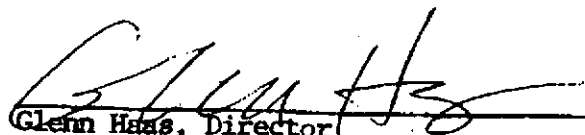

Director
Office of Ecosystem Protection
Environmental Protection Agency
Boston, MA


Director, Division of Watershed
Management
Department of Environmental
Protection
Commonwealth of Massachusetts.
Boston, MA

This Permit is transferred to the
Town of Wayland.

Signed this 5th day of November, 1999


Linda M. Murphy, Director
Office of Ecosystem Protection


Glenn Haas, Director
MA Department of Environmental Protection

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date, the permittee is authorized to discharge treated sanitary wastewater from outfall serial number 001. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations		Monitoring Requirement	
	Average Monthly	Average Weekly Maximum Daily	Measurement Frequency	Sample Type
Flow, GPD ¹	52,000	65,000	Continuous	Recorder ²
TSS, mg/l	30	50	1/Week	24-hr comp ³
BOD ₅ , mg/l	30	50	1/Week	24-hr comp ³
pH, S.U.	See I.A.1.b.		1/Week	Grab
Fecal Coliform, #/100 ml	200	400	1/Week	Grab
Phosphorus, mg/l	0.5	----	1/Week	Grab
Aluminum, Total, mg/l	----	Report	1/Week	Grab
Whole Effluent Toxicity Testing LC ₅₀ ⁵	----	≥ 100%	1/Year ^{5,6}	24-hr comp ³

- Effluent samples shall be taken after the UV disinfection system.

-- Footnotes are listed on Page 3 --

- a. The discharge shall not cause a violation of the water quality standards of the receiving waters.
- b. The pH of the effluent shall not be less than 6.5 nor greater than 8.3 at any time, unless these values are exceeded due to natural causes or as a result of any approved treatment process(es).
- c. The discharge shall not cause objectionable discoloration of the receiving waters.
- d. The effluent shall contain neither a visible oil sheen, foam, nor floating solids at any time.
- e. When the effluent discharged for a period of 90 consecutive days exceeds 80 percent of the design flow, the permittee shall submit to the permitting authorities a projection of loadings up to the time when the design capacity of the treatment facility will be reached, and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans.

Footnotes:

1. The flow limit of 65,000 GPD is required if the "Sewer Connection Option", as described later, is pursued. For this option, a minimum of 4,740 GPD shall be tie-ins from existing, failing septic systems. The rest of the flow from Town sewerage may come from the tie-ins of existing, failing or inadequate septic systems. If the alternative plan to achieve phosphorus reduction within the Watershed, as described in Section I.A.4.c., is submitted to EPA and MADEP and approved, then the maximum daily flow limit shall be 45,000 GPD.
2. For flow, report maximum and minimum daily rates and total flow for each operating day.
3. A 24 hour composite sample will be flow and time weighted and will consist of at least twenty four (24) grab samples taken at equal time intervals throughout the period.
4. These are also State certification requirements.
5. The LC_{50} is the concentration of effluent which causes mortality to 50% of the test organisms. Therefore, a 100% limit means that a sample of 100% effluent (no dilution) shall cause no more than a 50% mortality rate.

Within three (3) months after the effective date of the permit, the permittee shall submit to EPA and MADEP for their approval, the following:

- a. A preliminary draft plan to achieve nonpoint source reduction of at least 0.375 lbs/day of phosphorus within the Watershed, based upon the Sewer Connection Option: If the permittee discharges more than an average of 30,000 gallons per day (GPD), not including flows from the tie-ins of failing septic systems, then the amount of nonpoint source phosphorus to be removed to meet the 3:1 trade shall be increased proportionately.
- b. In order to provide EPA and MADEP reasonable assurance that the phosphorus reduction shall be achieved under the "Sewer Connection Option", a description of the mechanism (e.g. contract, memorandum of agreement) by which the town of Wayland will acquire at least 4,740 GPD capacity in the permittee's wastewater treatment plant and connect to that plant existing, failing septic systems in the Watershed to utilize that capacity.

The permittee shall respond to all written comments by EPA and MADEP and shall make all changes to the preliminary draft plan required by EPA and MADEP for their approval.

Within twelve (12) months of the effective date of the permit, the permittee shall submit to EPA and MADEP for their approval, the following:

- c. A final draft plan to achieve phosphorus reduction consistent with the plan described in Section I.A.4.a. above, or amendments thereof. However, if the permittee determines that such plan is not sufficiently assured, it shall instead submit an alternative plan to achieve a phosphorus reduction of at least 0.375 pounds per day within the Watershed by means of any one or a combination of the following:
 - i. Payment to public or private parties of a sum, which the permittee estimates will not exceed \$150,000, to implement repairs, upgrades or modifications to failing septic systems within the Watershed; and/or
 - ii. harvesting of nuisance plants or other phosphorus-releasing materials visibly present in the Watershed; and/or

iii. storm water management or other proposals.

The plan shall describe and evaluate how each plan component will reduce phosphorus loadings to the Watershed. If the permittee proposes alternative Part I.A.4.c.i., the plan shall also include a description of the mechanism by which there is reasonable assurance that the funds will be spent to implement the phosphorus reduction. Although the selection of the plan component(s) and the proportions of each shall be determined by the permittee, the evaluation of how the plan component(s) will reduce phosphorus loadings and the calculations used to demonstrate the required reduction of at least 0.375 pounds per day shall be subject to EPA and MADEP approval.

d. A schedule for implementation for the phosphorus reduction plan described in Section I.A.4.c. above.

The permittee shall respond to all written comments by EPA and MADEP and shall make all changes to the final draft plan and schedule required by EPA and MADEP for their approval.

Unless otherwise notified by EPA or MADEP, the permittee shall initiate implementation of the plan within sixty (60) days of the final plan approval.

The final plan and implementation schedule approved by EPA and MADEP shall become an enforceable part of this permit. The reduction of at least 0.375 pounds per day in nonpoint source phosphorus loadings to the Watershed required by this permit shall be achieved no later than two (2) years after the effective date of this permit.

Within six (6) months of the final plan approval by EPA or MADEP, the permittee shall enter into an agreement with necessary public or private parties for implementation of the plan and submit such executed agreement to EPA and the MADEP. This agreement and related documents shall:

Outline each party's roles and responsibilities for plant ownership/operation of the phosphorus reduction plan; describe the status of plan implementation; and include provisions for annual reporting.

These annual reports shall be submitted on May 15th of each year and shall discuss compliance with permit requirements and scheduled milestones relating to phosphorus trading. The reports shall also describe efforts to be conducted during the following year to reduce phosphorus loading within the Watershed to the extent required by the permit.

5. Optimization Study

The permittee shall conduct an optimization study of its wastewater treatment plant which will evaluate and recommend plant operation, maintenance and/or modifications to maximize phosphorus removals through the plant. A study plan and implementation report shall be submitted within two (2) years after the effective date of the permit. Upon submittal of the plan, the plant shall be operated in accordance with the findings of this study in order to maximize phosphorus removal for the duration of the permit. These submittals shall be made to the addressees on Page 8 and 9.

6. Instream Monitoring Program

The permittee shall initiate an instream monitoring program to determine the existing condition and the post-discharge condition of the Sudbury River from two sampling locations. Beginning in 1998, and continuing annually thereafter, this sampling shall be conducted monthly from May to November and focus on nutrients. The permittee shall conduct sampling for the listed parameters below at nearby points upstream and downstream of the proposed discharge, subject to review and approval by the EPA and the MADEP. All samples shall be analyzed for the following parameters: nitrate and nitrite nitrogen, phosphorus, chlorophyll A, and pH. Dissolved oxygen shall also be monitored upstream and downstream of this discharge for the months of June, July and August only. This sampling shall be done three times per week. For each of these three days, there shall be two samples taken each day, one in the early morning and the other in late afternoon. Results of this monitoring shall be reported in accordance with Section C. of the permit. In addition, the annual reports described in Section 4 above shall include a summary of any water quality monitoring results obtained during the previous 12 months.

B. SLUDGE CONDITIONS

1. GENERAL CONDITIONS

- a. The permittee shall comply with all existing federal and State laws and regulations that apply to sewage sludge use and disposal practices and with the Clean Water Act (CWA) Section 405(d) technical standards. If an applicable management practice or numerical limitation for pollutants in sewage sludge more stringent than existing federal and state regulations is promulgated under Section 405(d) of the CWA, this permit shall be modified or revoked and reissued to conform to the promulgated regulations.
 - b. The permittee shall give prior notice to the Director of any change(s) planned in the permittee's sludge use or disposal practice.
 - c. A change in the permittee's sludge use or disposal practice is a cause for modification of this permit. It is a cause for revocation and reissuance of this permit if the permittee requests or agrees.
2. For sewage sludge which is to be landfilled, the permittee must dispose of this sludge in a landfill which is in compliance with 40 CFR Part 258.
 3. Sewage sludge disposed of in a municipal solid waste land fill shall not be hazardous. The Toxicity Characterization Leachate Protocol (TCLP) shall be used as demonstration that the sludge is non-hazardous.

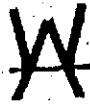
C. MONITORING AND REPORTING

1. Reporting

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15th day of the month following the effective date of the permit.

Signed and dated originals of these, and all other reports required herein, shall be submitted to the Director and the State at the following addresses:

U.S. Environmental Protection Agency
Planning and Administration (SPA)
P.O. Box 8127
Boston, Massachusetts 02114



WOODCOCK & ASSOCIATES, INC.

Utility Rates and Finance

Fax Transmission

Date: 1/30/01

Time:

Pages

To: George Papadopolis EPA Boston

phone:

fax: 617-918-1505

From: Chris Woodcock
Woodcock & Associates, Inc.

phone: 508-358-2218

fax: 508-358-2206

Re:

re - information of
Wayland MA

- 1. listing of properties - those with data on left are connected
- 2. Monthly operating report for Dec 2001 & Nov 2001

Chris Woodcock

	Name	Address	Bellement Capacity (gpd)	Water Use (gpd)
			45,000	5,681
Oct 26, 1999	Congress Group	400 BPR		460
Feb 11, 2000	Russell's (inc house & :	397 BPR	3,253	90
July 1, 2000	Ralph Osmond	364 BPR	200	33
1	Starmar	338 BPR	325	148
1	Starmar-Pizza	336 BPR	1,200	41
1	Sovereign Bank	328 BPR	332	172
June 15, 2001	Dr. Stacks	311 BPR	600	385
Oct 4, 2000	Nails/Olgas	310 BPR	215	213
1	KW Hotel Corp	304 BPR	200	148
1	Russell House	372 BPR	0	57
1	Poisson	300 BPR	342	180
Sept 28, 2001	Wayland Cleaners	298 BPR	300	49
Sept 28, 2001	KaBloom	298 BPR	0	4,468
Oct 2, 2001	Wayland Realty Trust	297 BPR	4,000	90
Sept 21, 2001	State Rd Auto	292 R BPR	200	533
Dec 11, 2000	Somerby's	292 BPR	1,100	2,213
1	Fleet Bank	289 BPR	266	254
Oct 5, 2000	Post Office	277 BPR	424	66
1	Shepard - house	274 BPR	330	16
1	Shep's Mobil	268 BPR	400	4
Sept 24, 2001	Ulbrich	264 BPR	200	74
1	Benson's	234 BPR	1,000	156
1	Carapezza	233 BPR	600	74
Sept 14, 2000	Wheeler	231 BPR	200	74
1	Phoenix Vet	9 Pelham Is	300	98
1	Kaplan, Lenow & McCa	13 Pelham Is	200	246
Nov 27, 2000	Cont Hair	19 Pelham Is	492	180
June 1, 2001	Secore (3/99)	30 Coch Rd	330	82
July 26, 2000	Lew Russell	105 Pelham	440	180
Feb 18, 2000	Tim Skehan	101 Pelham	440	234
April 25, 2000	Baston	11 Coch	440	33
1	Collins	21 Coch	257	74
Aug. 16, 2001	Katy's Flower	25 Coch	200	172
Oct 13, 2000	Pei-Lin	31 Coch Rd	260	1,394
1	Town Hall		3,000	303
1	Public Safety Bldg	38 Coch Rd	700	98
1	Ched Blair	267 BPR	310	

W/6, 2001

all to connect

G LIST

Luscomb (5/99)	286 BPR	200	100
Taub - Office (5/99)	73 Pelham Is	210	156
Patterson (8/99)	Coch Rd	209	0
Kowalski (8/99)	9811 Millbrook		0
Wayland Library (10/99)			0
Harakles (10/31/99)	11 Old Sudbury		0
Villari (11/16/99)	3 Winthrop		0
LaFarge. C. (4/12/00)	1 Old Sudbury Rd.		
Welland. Getrud (5/2/01)	10 Old Sudbury Rd		
Taub House (9/26/01)	213 BPR		
Caraways - Jay Coffma	325 BPR		
Connolly	32 Pelham Is	440	261
Historic Soc	12 Coch	330	11
Bell Atlantic	244 BPR	200	29
Sam Russell-Caroway	325 BPR	1,200	858
Bill & Leo's	356 BPR	200	101
LMA Mngt (offices)	260 BPR	510	344
			0
			0
Totals		71,554	20,634
Signed up less Congress Grp		23,055	13,092
Total Sign		68,055	18,773

wait list not signed up

**WOODARD & CURRAN
ENVIRONMENTAL SERVICES
Monthly Operating Report
December, 2001
Wayland Wastewater
Treatment Plant**

Date: January 4, 2002

To: Lana Carlsson-Irwin
Eugene Roberts
Christopher Woodcock

Cc: Jack Bonomo
Bill Porter

From: Preston J. Cignarella and W& C Staff

Key Activities This Month

The month of December was extremely busy. Lower than normal flow was reported at 07:00 am on 12/03/01. A sewer line break was detected by 09:30 and repair was completed early evening on 12/4/01. The repair location was at # 304 Boston Post Road and appeared to be caused by improper installation tie in. Gene Roberts arranged for a town backhoe to excavate the service and the piping repairs were performed by W&C staff.

There was one equipment failure for the month (12/16/01 at 6:30 pm). The bearing for the sludge collector speed reducer failed. This was caused from fatigue. Alarms were reset; the speed reducer and drive sprocket were replaced within 36 hours. There was not any negative effect on the effluent quality during the brief period.

The backup UV unit was completely overhauled with new bulbs, quartz tubes and o-rings. This unit was returned to service on 12/26/01 as part of the capital cost program.

All old sludge has been removed from the clarifier and the storage tank is roughly 1/2 full.

WAYLAND WASTEWATER MANAGEMENT DISTRICT COMMISSION

Commissioners:
Eugene Roberts, Chairman
Lana Carlsson-Irwin
Harry Sweitzer

Town Building
41 Cochituate Road
Wayland, MA 01778

December 23, 2004

Ms. Jeanne Voorhees
USEPA
1 Congress Street
Suite 1100 (CPEO)
Boston, MA 02114-2023

Dear Ms. Voorhees:

I am pleased to provide a list of all current and potential future users serviced by the Wayland Wastewater Treatment Plant. The list is enclosed. A number of the users on the list are considered to be users because they declared their intention to become users, have paid the betterment charges, and are paying user fees. However, these users have not yet connected to the system. I have identified these users on the list by an asterisk (*) after their names. They have been approved by the Commission for connection and could connect at any time. Also, I have indicated commercial users by © and residential users by ® after their names.

Potential future users are:

1. Jonathan Buchman – Mr. Buchman of Wellesley recently purchased a multi-family residence at 32 Pelham Island Road. He has advised me that he intends to demolish the structure and construct an office building. He plans to connect to the system when the building is completed. I do not have a firm date for his connection but I estimate that it will take place in 2005.
2. Wayland Public Library – The Wayland Public Library is planning an expansion and, in connection with that expansion, is planning to connect to the system. I am unable to estimate the connection date but it is probably several years in the future if it happens at all.
3. Wayland Commons – Wayland Commons is a proposed housing development of 48 residential units to be located near the treatment plant. The developer, Michael Intoccia, has not met with the Zoning Board to seek approval for the project. Therefore, it is not possible to estimate a connection date or if the project will be approved.
4. Any resident or business along Route 20 or near the Route 20/Route 27 intersection is a potential user of the system if not now a user. No applications are currently before the Commission.

I trust that I have provided the information that you require. If you have questions or need more information, you may contact me by letter at the Wayland Town Building or by Email at billp26@hotmail.com.

Sincerely,

A handwritten signature in cursive script that reads "William R. Prendergast". The signature is written in dark ink and is positioned above the printed name and title.

William R. Prendergast
Director

WAYLAND WASTEWATER MANAGEMENT DISTRICT COMMISSION

SYSTEM USERS

NAME	Address
Wayland Business Center ©	400 Boston Post Road
Russell's Garden Center ©	397 Boston Post Road
Ralph Osmond Company ©	364 Boston Post Road
Dave Starmer (*)©	338 Boston Post Road
Dave Starmer Wayland Pizza (*)©	336 Boston Post Road
Sovereign Bank (*)©	328 Boston Post Road
Dr. Stacks ©	311 Boston Post Road
Nails/Olga's ©	310 Boston Post Road
304 BPR LLC ©	304 Boston Post Road
Russell's House ©	372 Boston Post Road
Francis Poisson (*) ©	300 Boston Post Road
Wayland Cleaners ©	298 Boston Post Road
KaBloom ©	298 Boston Post Road
Shopping Center ©	297 Boston Post Road
State Road Auto Body ©	292 Boston Post Road (rear)
Somerby's Hair Salon ©	292 Boston Post Road
Bank of America (*) ©	289 Boston Post Road
US Post Office ©	277 Boston Post Road
Mark Shepard (*)©	268 Boston Post Road
Shepard House (*) ©	274 Boston Post Road
Richard Ulbrich ©	264 Boston Post Road
Corner Store Café ©	234 Boston Post Road
Dr. Carapezza ©	233 Boston Post Road
Wayland Capital Management ©	231 Boston Post Road
Phoenix Veterinary Service ©	9 Pelham Island Road
Kaplan, Lenow (*) ©	13 Pelham Island Road
Moodz Day Spa & Salon ©	19 pelham Island Road
Richard Secor ©	30 Cochituate Road
Lewis Russell ©	101 Pelham Island Road
Lew Russell ©	105 Pelham Island Road
Prescott Baston ©	11 Cochituate Road
Olde Collins Market (*) ©	21 Cochituate Road
Thomas Duffy ©	25 Cochituate Road
Pei-Lin ©	31 Cochituate Road
Town Building (*) ©	41 Cochituate Road
Public Safety Building ©	38 Cochituate Road
267 BPR LLC ©	267 Boston Post Road
(*) - not connected	
© - Commercial	
® - Residential	
William R. Prendergast	
December 23, 2004	