

Municipality/Organization: Marlborough, MA

EPA NPDES Permit Number:

MaDEP Transmittal Number: W-035393

Annual Report Number

& Reporting Period: No. 8 – May 2010- May 2011

NPDES PII Small MS4 General Permit
MAR041128
Annual Report
#8

Part I. General Information

Contact Person: Priscilla Ryder

Title: Conservation Officer

Telephone #: 508-460-3769

Email: pryder@marlborough-ma.gov

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: (see signature page below)

Printed Name: Nancy E. Stevens

Title: Mayor

Date:

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Signature: _____



Printed Name: Nancy E. Stevens

Title: Mayor

Date: _____

4/29/11

Part II. Self-Assessment

The City of Marlborough has completed the required self assessment and has determined that our municipality is in compliance with all permit conditions, except as noted below. Below we have highlighted items that were completed and proved successful, and items which were changed slightly or delayed for reasons noted, for this past year- May '10-May' 11.

Part D 1-1 – Informational brochures. The informational storm water pollution brochures were mailed in the spring '10 water bills. 10,500 pieces were mailed. The May 2011 mailing will go out in the spring '11 water bills as well. A copy of the brochure can be found at the following link http://www.marlborough-ma.gov/Gen/MarlboroughMA_PublicWrks/MarlboroughMA_Engineerng/stormwater-flyer.pdf

Part D 1-2 – Storm Drain Stenciling. As noted in last year's report 95% of the storm drains marked with plastic circular markers which say "No Dumping Drains to Waterways". However, the markers which were installed 8+ years ago are now fading, chipping or have fallen off due to the adhesive wearing out. This past year we purchased 6,000 replacement markers. In summer and fall 2011 we will work with some boy scouts/ volunteer groups to replace markers that have been removed and to begin replacing markers that have faded. When doing marker replacements we will also require that the door hangers be hung on every door near the replaced marker as an added reminder to resident, this will be an ongoing project.

Part D 1-3 – Cable TV show- A Public Service Announcement has been airing since fall of '09 which follows a small rubber duck down a storm drain sharing a message that only clean water should go down the storm drain. The YouTube link to this PSA can be seen through the Engineering web page on the city web and can be viewed here. http://www.youtube.com/watch?v=ieIm6bT5j10&feature=player_embedded

Part D 1-4 Student Education- The Conservation Commission continued to work with the local watershed group the Organization for the Assabet River who taught the curriculum for the "Water Wise workshops" which were held again during the summer months in '10. <http://www.assabetriver.org/our-work/education/waterwiseworkshops>

A summary of this outreach this past year is as follows:

- 6 workshops were held in Marlborough throughout the summer
- 2 high school students gained valuable work experience on the environment, stewardship and teaching
- workshop titles: "Watersheds and The Water Cycle", "Water Plants & Animals", "Water Testing & Conservation", and "Water Bugs Mystery".

- family workshop skit "Water Matters" covered storm water, environmental lawn care and invasive species

In addition, again several more students did high school science fair projects related to storm water, phosphorous loading in ponds, and non point source pollution based on things they had learned in the school as well.

Part D 1-5 – Web site - The Storm Water web page is updated annually and is posted at http://www.marlborough-ma.gov/Gen/MarlboroughMA_PublicWrks/MarlboroughMA_Engineerng/Stormwater-Management.

Part D 2-5- Stream Teams. –Several additional stream team groups went out in the spring of '10 and again this spring '11. The stream team reports have revealed that for the most part our streams are healthy. Although we did find several illicit discharges which were identified, reported and corrected. In general the inspections are revealing a relatively healthy system. The stream team reports are now posted on line at the following link. http://www.marlborough-ma.gov/Gen/MarlboroughMA_ConCommisn/StreamTeamReports

Part D 2-4; 3-2, 3-3, 3-4, 4-2- The City adopted two ordinances in November of 2009 these are titled: "Stormwater Management" and "Detection and Elimination of Illicit Discharge to Municipal Storm Drain system". Both these ordinances provide the city with a better means of monitoring, controlling and enforcing against storm drain violations. Stormwater Regulations to accompany the Stormwater Management Ordinance are ready for adoption; a public hearing has been set for May 30, 2011. The Illicit discharge ordinance stands on its own and does not need further regulations. Both ordinances are on the books and are currently being enforced and followed.

The web links to both these ordinances are as follows:

Link to City Code: <http://www.ecode360.com/?custId=MA1056>

Search word: "Stormwater Management" and "Detection and Elimination of Illicit Discharge to Municipal Storm Drain System"

Part D 4-2; 4-4– We have not established a baseline testing protocol for the streams in the city. As noted in previous reports we do have some baseline data on several of the major stream systems done on Ft. Meadow Reservoir, Millham Reservoir, and the Sudbury Reservoir and Hop Brook which can be used in the future as needed for future comparison. The Stream Team reports noted above have provided valuable data and information about stream health and have allowed for follow up and elimination of discharges into the stream system. With new testing requirements anticipated in the next round of EPA permits it was determined that the specific testing protocol would be developed once these new criteria are established.

Part D 6-3 Employee Training - The DPW has an Integrated Contingency Plan dated Sept. '03 which was updated in '06. The purpose of the plan is: "To describe how the

Marlborough DPW handles emergencies associated with fires, injuries and releases and spills of hazardous chemicals, hazardous and extremely hazardous substances, hazardous wastes, hazardous matters and petroleum products at their Neil St. facility.” As noted in previous reports this documents helps guide the handling and proper storage of hazardous materials at the DPW facility.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – continuing
1-1	Informational brochures	Conservation/ Priscilla Ryder	Distribute city wide annually	The brochure is complete. (web link noted above) This will be mailed out in the water bill cycle in June of '11	This will be the last year we mail out this flyer. Based on new MS4 permit requirements this will change.
1-2	Storm drain stenciling	Conservation/ Priscilla Ryder	Stencil ¼ of drains per year	All city storm drains were marked in 2009.	5000 additional markers have been purchased. A marker replacement program is being developed.
1-3	Cable TV Program	Conservation/ Priscilla Ryder	Tape/ air once annually	A one minute PSA has been running regularly since Fall of 2009 on the local cable channel approximately 10 times per week. (see link above)	PSA will continue to air indefinitely. A link to this PSA is now on the website. http://www.youtube.com/watch?v=ieIm6bT5j10&feature=player_embedded
1-4	Student Education		Speak to middle school class	The Water Wise Workshop series was held again in summer of '10 and was successful. http://www.assabetriver.org/our-work/education/waterwiseworkshops	Funding has been provided for another summer of Water Wise Workshops in summer of '11 in conjunction with the Organization for the Assabet River and The Mass Audubon society to continue the success of summer '10.
Revised		Organization for the Assabet River and Conservation Commission/ Priscilla Ryder	Water Wise workshop program developed and implemented		
1-5	Web site posting	Conservation/ Priscilla Ryder	Post storm water information on City Web site	The Stormwater web page has been posted at http://www.marlbrough-ma.gov/Gen/MarlboroughMA_PublicWorks/MarlboroughMA_Engineering/Stormwater%20Management.pdf	Information to be updated as needed annually in May of each year.

1-6	Prepare compliance report	Conservation/ Priscilla Ryder	Prepare annual report	Report prepared April '11	Will submit reports based on new MS4 permit requirements.
1-7	Annual Reporting Reminders	Conservation/ Priscilla Ryder	Notices to non-residential properties	Annual reports from companies are being filed with the Conservation Commission by June 1 st of each year. We received several such reports.	Will do ongoing monitoring to ensure stormwater maintenance is done on private non-residential properties. Developing a computer tracking system.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Continuing
2-1	Volunteer for stenciling	Conservation/ Priscilla Ryder	Volunteers to install storm drain markers	Ordered 5,000 new storm drain markers to replace faded and missing makers.	All street storm drains have been marked, but old ones have faded and need replacing. Some newer ones have become unglued and need replacing. We will work on replacing markers as needed and hanging door hangers when that is done. Where available we'll use volunteers.
2-2	Household Hazardous Waste Collection day	Emerg. Mgt/ Don Cusson	Hold HHWCD Annually	Two events were held in May 21 and November of '10	Two events scheduled annually spring and fall.
2-3	Storm Water Management Advisory Committee	Conservation/ Priscilla Ryder	Form SWMAC	The SWMAC did not meet in 2010	SWMAC will meet several times in '11 to assist in review of storm water regulations.
2-4	Public Hearings	Conservation/ Priscilla Ryder	Hold Public Meeting on SWP	The public hearing will be held on May 30th to review the Stormwater Regulations before being adopted.	No additional meetings needed.

2-5	Stream Team	Conservation/ Priscilla Ryder	Form Stream Team	Stream team leadership groups went out to investigate additional streams in the city. Several illicit discharges were detected and followed up on. Reports are on line as noted above in the self- assessment.	Stream Team to monitor remaining five stream systems in the city in spring and fall '11 before leaf out and annually until all streams have been monitored.
2-6	Clean up day	Mayor and City Council	Sponsor city wide Clean-up day	200 volunteers worked for three hours collecting 7.82 tons of trash during the annual city wide Clean Sweep in May 1 st , 10	Annual cleanup to continue 4-30-11 and annually.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – continuing
3-1	GIS Mapping	DPW/ Nat Bowen GIS coordinator	Map City ¼ of Drainage System	95% of the city's drainage system has been entered onto the GIS mapping system. New information being added as it is provided.	The remaining 5% of the final drainage linkages through private property will be done by interns as time permits and as as-built plans are submitted. This will be ongoing.

3-2	Ordinance Review	DPW/ city engineer Tom Cullen and Priscilla Ryder Conservation Officer	Review applicable ordinances	The Stormwater Management Ordinance was passed in November of '09.	Regulations will be promulgated in June 2011. A public hearing on the regulations is scheduled for May 30, 2011.
3-3	Protocol development for IDDE	DPW/ city engineer Tom Cullen	Develop protocol for IDDE	Detection and Elimination of Illicit Discharge to Municipal Storm Drain System Ordinance was passed in Nov. '09	none
3-4	Ordinance Modifications	DPW/ city engineer Tom Cullen	Drainage ordinance modifications	Detection and Elimination of Illicit Discharge to Municipal Storm Drain System Ordinance was passed in Nov. '09	Done Ordinance passed.
3-5	Stream Team inspections	Conservation/ Priscilla Ryder	Inspect city's streams/outfalls	See 2-5 above	See 2-5 above
3-6	Ill. Dis. Notice/Enforcement	DPW/ city engineer Tom Cullen	Disconnect w/in 6 mos.	This is currently ongoing when detections are made they are required to disconnect. This is outlined in the ordinance. Followed up on 4 illicit discharge reports and resolved issue. (See below)	This will be ongoing

4. Construction Site Storm water Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – continuing
4-1	Regulation Review	DPW/ City Engineer- Tom Cullen	Review applicable regulations	Stormwater Management Ordinance passed in Nov. '09	Done – ordinance passed.
4-2	Sampling/Testing	DPW/city engineer- Tom Cullen	Sample/test to est. baseline	Have not established baseline for sampling.	Protocol for baseline sampling will be developed after new permit is issued.
4-3	Storm water management policy	DPW/ City Engineer- Tom Cullen	Adopt DEP Policy	Stormwater Management Ordinance passed in Nov. '09	Done – ordinance passed
4-4	Re-sampling retesting discharges	DPW/ city engineer- Tom Cullen	Resample/retest discharges	See 4-2 above	See 4-2 above

5. Post-Construction Storm water Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – continuing
5-1	Regulation Reviews	DPW/ city engineer- Tom Cullen	Review applicable regulations	See 4-1 above	See 4-1 above
5-2	Sampling/testing	DPW/city engineer- Tom Cullen	Sample/test to est. baseline	See 4-2 above	See 4-2 above

5-3	Storm water management policy	DPW/ city engineer- Tom Cullen	Adopt DEP Policy	See 4-1 and 4-3 above	See 4-1 and 4-3 above
5-4	Re-sampling/retesting	DPW/ city engineer- Tom Cullen	Resample/retest discharge	See 4-4 above	See 4-4 above
5-5	Annual Reporting	Conservation/ Priscilla Ryder	Achieve annual reporting compliance	See 1-7 above	See 1-7 above
5-6	Random inspections	Conservation/ Priscilla Ryder	Inspect 10 facilities	See 1-7 and 1-7a above	See 1-7 and 1-7a above

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	Planned Activities – continuing
6-1 revised	Street Sweeping	DPW/ Tom Temple	Sweep all streets annually	All streets were swept between April and Nov. 2010 (see city web link below)	All streets will be swept between April and Nov. 2011
6-2 revised	Catch basin cleaning	DPW/ Tom Temple	Clean ½ catch basins annually	1/3 of catch basins were cleaned in 2010. (Reduction is based on budget constraints)	Anticipated 1/3 of catch basins will be cleaned in 2011 (based on budget appropriation.)
6-3	Employee training	DPW/ city engineer	Train DPW employees	Training on integrated pest management practices was done for school buildings and field maintenance. The DPW has been keeping up with good housekeeping practices discussed in pervious years.	In-house employee training will be ongoing regarding materials storage, sweeping, and IPM management. In the future custodial staff will also be trained.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

– The TMDL for the Assabet River and “Brook and Pond assessment” for Hop Brook were both issued. In short the Assabet River TMDL requires the city to implement stringent controls on its POTW’s and reduce sediment phosphorous loads, both of which are currently being pursued. The report does not require any non-point source controls at this time. However, the implementation of the city’s Stormwater Ordinance and

Detection and Elimination of Illicit Discharges to the Stormwater System Ordinance, for all projects in the city will help to reduce phosphorous inputs for runoff from new developments and existing developments.

Currently the City is underway with the construction for upgrades to its Westerly Wastewater Treatment Plant (Assabet River). The design and construction of upgrades to the Easterly Wastewater Treatment Plant (Hop Brook) is now in progress. The design of both plants will include facilities that will markedly reduce point source nutrient loadings to the receiving waters by reducing phosphorus from our present permitted limit of .75 mg/L to .1 mg/L, an 80% reduction.

Part IV. Summary of Information Collected and Analyzed

All applicable information is included in Part II and III above.

Attachments:

The following documents are attached through the various web links as noted above and attached below for easier reference:

1. Stormwater brochure for city wide distribution (1-1)
2. Storm Water Management Web site- (1-5)
3. Stream Team report – copy of first page of 2010 report (2-5)
4. GIS – drainage map – sample map showing catch basins and piping and direction of flow and detention basins (3-1) see below
5. Drainage Report Check list (3-2) see below
6. Illicit Discharge and Elimination report
7. Street sweeping schedule – (6-1) check link http://www.marlborough-ma.gov/Gen/MarlboroughMA_PublicWrks/MarlboroughMA_Operations/MarlboroughMA_DPWStreets/2010StreetSweeping.pdf
8. Stormwater Public Service Announcement (1-3) check link http://www.youtube.com/watch?v=ieIm6bT5j10&feature=player_embedded

ATTACHMENTS

#1. Brochure for city wide distribution (1-1)

Be a part of the Solution

- ⇒ Don't dump anything into the storm drain
- ⇒ Use fertilizers and pesticides sparingly
- ⇒ Keep grass clippings, trash, and dirt off the streets and out of the gutter
- ⇒ Prevent automobile fluid leaks-oil gas, etc.
- ⇒ Wash your car on the lawn so water and soap get absorbed
- ⇒ Use low phosphate detergents in small amounts
- ⇒ Clean up pet waste; put in trash
- ⇒ Spread the word about protecting our water
- ⇒ Participate in the annual clean sweep- the city works to pick up trash and sweep streets to remove sand from streets and catch basins
- ⇒ Participate in Household Hazardous Waste Collection days
- ⇒ Follow the local Stormwater Ordinance
- ⇒ Report illegal dumping to the Fire Department 508-485-2323

How Do These Drains Work?

The drain on the left, the sewer, takes in water from your house (sinks, tubs, toilets). It gets treated in a waste water treatment plant. The drain on the right, the storm drain, takes in water from the pavement, lawns and parked cars and DOES NOT get treated. This water flows directly back into lakes, streams and ponds. Only clean water should go down storm drains.



For more information, contact the
Marlborough Conservation Office
at:
508-460-3768 or
pryder@marlborough-ma.gov

Brochure by: Nicole Shanks
2008

City of Marlborough



Stormwater
Pollution

You can help
keep our
streams, lakes
and drinking
water clean
with a few
easy steps!!

Stormwater Pollution

What is Stormwater?

It's the rain or melted snow that runs down our roads and into the drains in the streets and then into lakes, rivers, or streams.

What is the problem?

Every time it rains, gallons and gallons of Stormwater runoff from our roads flow **UNTREATED** into the nearest lake, pond or river and our drinking water.

What Pollutes?

Motor oil, fertilizers, pesticides, dirt, yard clippings, pet waste, mud and other pollutants that end up on road surfaces from cars and adjacent lawns and construction sites are pollutants.

What is this round marker?



These markers are found on the side of most catch basins in the street throughout the city to remind us not to pollute our waterways by being part of the solution.



Don't be a part of the

Problem

Excess Fertilizers, pesticides & herbicides used on lawns can wash off into roadways, into drains then untreated into bodies of water. Fertilizers cause algae blooms, or increased pond weed growth!



An Algae Bloom

Oil, paint, gas, metals and detergents from cars are toxins that are harmful to aquatic life and when in our water supply, are expensive to remove.

Pet Waste is rich in nutrients, like fertilizers. But they also include fecal bacteria, which can close down beaches!

#2. Storm Water Management Web site- (1-5)

http://www.marlborough-ma.gov/Gen/MarlboroughMA_PublicWrks/MarlboroughMA_Engineering/Stormwater%20Management.pdf

#3 Stream Team Report

All stream team reports for 2007, spring and fall 2008, spring 2009, and spring 2010 can be found at the following web site.

http://www.marlborough-ma.gov/Gen/MarlboroughMA_ConCommisn/StreamTeamReports

Below, please find the cover sheet, and areas inspected for the spring 2010 report.

Stream Team Report



Various Streams Marlborough, Massachusetts


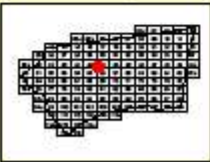


Study Conducted April 2010

Compiled by: Priscilla Ryder (with help from Jen Boudrie)

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Stream Study 1- stream flowing into Sudbury Reservoir	4
Stream Study 2- stream flowing into Sudbury reservoir	15
Stream Study 3- streams flowing into Ft. Meadow Area	20
Stream Study 4- streams flowing through the Desert Natural Area	45
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#4 GIS- drainage map sample



 Locus Map 	<h2>Basin ID Number</h2> <h1>DB043-63</h1>	<h2>Legend</h2> <table border="0"> <tr> <th>Drain Features</th> <th>Landbase Features</th> </tr> <tr> <td>) Catch Basin</td> <td>Building</td> </tr> <tr> <td>(Drain Manhole</td> <td>Tank</td> </tr> <tr> <td>→ Drain Pipe</td> <td>Lake/Pond</td> </tr> <tr> <td>— Culvert</td> <td>Wetland</td> </tr> <tr> <td>% Headwall/Outfall</td> <td>River/Stream</td> </tr> <tr> <td>○ Detention Basin</td> <td>Easement</td> </tr> <tr> <td>R Outlet Control</td> <td></td> </tr> </table>	Drain Features	Landbase Features) Catch Basin	Building	(Drain Manhole	Tank	→ Drain Pipe	Lake/Pond	— Culvert	Wetland	% Headwall/Outfall	River/Stream	○ Detention Basin	Easement	R Outlet Control	
Drain Features	Landbase Features																	
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— Culvert	Wetland																	
% Headwall/Outfall	River/Stream																	
○ Detention Basin	Easement																	
R Outlet Control																		
City of Marlborough, Massachusetts  Detention Basin Atlas December 2007	Location: BELLOWS CIRCLE Year Built: 2000 Fencing: YES Fence Height: 5 Fence Material: CHAIN LINK Accessibility: Easement Access: YES Last Maintenance: Comments:	 Date of Last Page Update: Aug 04, 2008																

DRAINAGE REPORT CHECKLIST

Owner' Name: _____ Engineer's Name: _____
Site Address: _____ Date: _____

The following checklist is not all-inclusive, but is generally representative of the requirements of the Marlborough Site Plan Review and Approval Ordinance (SPR&A) and the Planning Board's Rules and Regulations (S/D R&R). In all cases, you should use the checklist in conjunction with the SPR&A and S/D R&R as appropriate.

All reports shall be bound and include the following information:

Report Cover

- Project title/development name
- Site address
- Site map and parcel
- Owner's name, address, and telephone number
- Developer's name, address, fax and telephone number
- Engineer's and Surveyor's names, address, fax and telephone number
- Date of report (with latest revision date(s))
- Engineer's stamp

Pre- and Post-development Plans

- Pre- and post-development plans on 24"x36" sheets in AutoCAD format
- Clearly show all pre and post subcatchment areas
- Show all ultimate point source discharge locations for each subcatchment area
- Show all Tc paths with lengths and slopes for each subcatchment area
- Plans should show enough topographic information outside of the site to show pre and post discharge impacts

Summary

- Description of project
- Locus map
- Soil Conservation Service maps
- Description of existing conditions/use
- Description of proposed conditions/use
- Flow Summary table showing changes in pre and post-development flows for the 2, 10, 25, and 100-year storm events-Post-development flows shall not exceed pre-development flows

Pre-Development Conditions

- Pre-development drainage conditions (describe in report and coordinate with pre-development plans)
- Describe all existing subcatchment areas
- Describe (and label on plan) impervious and pervious areas within each subcatchment
- Provide CN number calculations
- Provide Tc calculations
- Provide flow calculations for the 2, 10, 25, and 100-year storm events
- Provide hydrographs showing time-stage relationship (peak flow, peak hour)
- Test Pit Data (locations shall be shown on pre- and post-construction plans)
- Groundwater elevations
- Percolation test results

Post-Development Conditions

- Post-development drainage conditions (describe in report and coordinate with post-development plans)
- Describe all existing subcatchment areas

#6

Illicit discharge reports and follow up:

DATE	Location	Problem	Investigation and Follow up
September 28, 2010	Stream at Florence Street	Milk colored water discharging	Identified source from Senior Center. Drilling discharge water from elevator repair was being dumped into storm drain. Activity was halted. Problem was solved; company was notified that this was illegal.
April 4, 2011	Mowry Brook behind 150 Cook Lane	Discolored water during rain event- "black ink color"	During rain event very "black" colored water "almost like ink" was being observed in the stream at several locations. Source was not found. Site contractors and upstream investigation.
April 8, 2011	245 East Main Street	Raw sewage draining from the building onto street into storm drain	Responded to report of a weird drain on a building. Board of Health and DPW and Conservation addressed issue. Problem was corrected; dirty water and sewage residue was cleaned up. Plumbing inspector to follow up to ensure corrective measures are implemented for the long term.
November, 2010	54 Hanlon Drive	Sudsy soapy water discharge into stream behind this home in early morning hours only during spring and summer.	In fall 2010 DPW inspected pipes and pipe intersections for this drain line to find connection that may be culprit. Follow up phone calls to abutters did not reveal sources. If problem continues will smoke the pipe to find the illegal connection. Alerting abutters may have solved problem.

END