



DEPARTMENT OF PUBLIC WORKS

TOWN OF ARLINGTON  
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Arlington, Massachusetts 02476

Engineering Department

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March 30, 2010

Thelma Murphy  
US EPA (CIP)  
One Congress Street - Suite 1100  
Boston, MA 02114-2023

**RE: Draft Small Municipal Storm Sewer System (MS4)  
General Permit for North Costal Communities  
Review Comments**

Dear Ms. Murphy:

Thank you for the opportunity to comment on the Draft MS4 permit. We have reviewed the documentation and have attended the EPA hosted public hearing on April 18, 2010. Like many of the communities which spoke and will be providing written comments, we are concerned about the increased funding which will be necessary to comply with the proposed permit. Items including increased outfall monitoring (dry and wet weather), outreach education, tracking of impervious surface areas, additional requirements on catch basin cleaning, and sidewalk sweeping, to name a few, are estimated to add approximately \$100,000 to \$200,000 in increased operating costs to an already stressed budget.

We currently take advantage of the Massachusetts Water Resources Authority's (MWRA) Infiltration/Inflow (I/I) Local Financial Assistance which provides funding in the form of a grant/loan for projects designed to removal I/I from Town sewers. Through this program, in which local funds are closely matched by the MWRA, we have been able to televise significant amounts of sewer main, identify problem areas and construct improvements. In many instances we have been able to identify previously unknown cross connections between the storm and sanitary sewer systems, repair sewer main failures which had been directly impacting storm drains and clean sewer mains to prevent sanitary system overflows (SSOs). We have set up a 12-year program to address the entire Town. We are currently in the third year of constructing improvements and have investigated though year five of the program.

The above program has been very successful to date in eliminating significant amounts of I/I as well as improving the Town's severely aged sewer main infrastructure. We are concerned that the funds necessary to comply with the proposed general permit will not allow us to continue with this successful program and in turn cause us to loose out on the grant funds available from

the MWRA. The MWRA funding program only applies to projects which reduce I/I and would not be applicable to satisfying the requirements of the MS4 general permit.

We are dedicated to improving the quality of stormwater runoff and only seek to ensure that any new regulation be efficient and cost effective. We respectfully request that the EPA give more consideration to the financial requirements of the proposed general permit. Until the cost implications to cities and towns can be better defined, we recommend that the EPA not issue the final permit.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael W. Rademacher', with a large, stylized flourish extending to the right.

Michael W. Rademacher, P.E.  
Town Engineer