

Bellingham, MA
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Comments on Revisions to MS 4 Permitting 2010

DiMartino, Donald to: Thelma Murphy

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Cc: "Fraine, Denis", "Selectmen", "Franklin DPW - Brutus C", "Rep Jennifer Callahan", "Rep. Jim Vallee", "Sen. Dick Moore"

Thelma,

Thanks for all you do.

Here are my comments on the Draft MS4 Permit presently out for public comment:

Public Education Requirements:

I feel that this responsibility should not be placed on individual MS4's. It seems to me this should be handled on a state-wide or region-wide bases using electronic media. Television and radio ads and public service announcements on major market stations will definitely better educate the public than a photo on local cable scrolls, bill stuffer, or addition to local newspapers. I feel one firm hired by the EPA or Mass DEP to prepare a campaign would make more sense and reach more people than a bunch of public works types with no experience in advertising or public education trying to do the minimum to comply with a regulation.

I have heard from people who should know that the general public is quite ignorant to the issues associated with stormwater. Public education is a vital part of getting the public to understand why their hard earned cash is going to be used for stormwater quality enhancement. This is especially true when there will likely be new fee or taxes put in place to cover many other very costly elements required in the proposed regulation.

Economics

Bellingham will be a signatory of a cooperative letter noting the nearly impossible task of funding the newly proposed programs while basic services are being cut by all Massachusetts cities and towns. I however, want to add my own comments.

You are preaching to the choir when asking me and other public works officials to pay more attention to stormwater. I would love to have an extensive stormwater program with funding for flood mitigation and stormwater quality projects. However, I was just dragged over the coals for requesting a drinking water rate increase needed to continue to maintain what is just above annual survival as a public water supplier. Establishment of a Stormwater Utility although all the rage in discussions, is not something I can suggest to Bellingham residents unless driven to do so by specific directives.

The costs of many aspects of the proposed new MS4 permit are most definitely significant. SEA Consultants, Inc. prepared a general cost estimate for compliance. Over the five year life of the permit they anticipate costs in the range of \$360,000 to over \$700,000. It is important to note that these costs are before municipalities start to construct stormwater outfall retrofit projects. My guess is our budget for the constructing BMP's at outfalls will cost ten as much. I understand the next five year MS4 permit will require construction.

I truly feel that if the EPA and MassDEP are as serious about stormwater quality as all the proposed regulatory changes indicate, they should come up with a sizable grant program. I also believe that without the 90% EPA grant programs of the late 1970's the first wave of the Clean Water Act (Wastewater Collection and Treatment) would not have progressed as quickly as it did. The cost estimates for construction of these stormwater treatment facilities per town is likely in the same scale. There will not be one hugely expensive treatment facility but many small drainage system outfall retrofit project to clean up

and recharge stormwater. I hope that federal grant funding could be implemented by modifications to the 319 Grant program, enhancement of the zero percent SRF loans, or establishment of a new loan program.

IDDE Plan Documentation - Outfall Monitoring During Rain & One size fits all permit requirements

The IDDE and Wet weather monitoring requirement carry the largest cost and I feel will yield the least benefit for us in Bellingham. These program may have real benefit for older establish MS4 systems but I can't see much of any benefit in Bellingham. The first NPDES Phase II MS4 permit allowed us to propose modifications to our individual permits. This draft appears much more stringent and therefore the potential yield less cost effectiveness. If we are going to be asked to expend an estimated \$260,000 for IDDE and wet weather outfall monitoring, I would rather put that towards BMP construction at an outfall.

The cost of wet weather monitoring (collection complexities and sample analysis) is very high. Bellingham is on the edge of urban area and not long ago would have been consider rural. We have never had a combined sewer. Dry weather outfall monitoring will tell us right away if someone has made an illegal connection to the storm drains from their septic system.

I urge the EPA to revisit these items to avoid the rigid one size fits all approach. It will make the selling of this new cost to our residents much easier if they know that it is a local solution and not some required regulatory expense they cannot understand and I cannot argue its merits.

Thank you for allowing me to comment.

Sincerely,

Donald F. DiMartino

Bellingham DPW Director

26 Blackstone Street

Bellingham, MA 02019-1602

Phone - 508-966-5813

Fax - 508-966-5814