



TOWN OF MEDWAY
DEPARTMENT OF PUBLIC SERVICES
MEDWAY, MASSACHUSETTS

*Entrusted To
Manage The
Public
Infrastructure*

THOMAS M. HOLDER
DIRECTOR

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March 30, 2010

Ms. Thelma Murphy
Environmental Protection Agency-Region 1
5 Post Office Square-Suite 100
Mail Code OEP06-4
Boston, MA 02109

Re: Comments on the Draft General Permit for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems

Dear Ms. Murphy,

The Town of Medway, Massachusetts, Department of Public Services has reviewed the draft General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer System (the Permit), and as the agency responsible for implementation of the regulations, respectfully submit the following comments.

Since 2003 the Town of Medway has successfully implemented the requirements of the Permit, however the draft Permit provides additional requirements and best management practices for each of the six control measures, that may prove too difficult for any town of Medway's size, with a limited budget and staff, to execute. We are concerned that the current economic climate presents the worst possible conditions in which to apply such strict requirements. Specific comments are provided below:

1. The water quality monitoring requirements are too extensive and will represent a large budget increase inconsistent with the storm water quality improvements it offers. A prioritization plan should allow the community to identify the best opportunities to improve storm water quality and restrict the scope substantially.
2. The additional mapping requirements such as seasonal high water table elevations impacting sanitary alignments, and catchment delineations, will represent another staffing issue, and increase to the budget. We recommend that the additional mapping be isolated to the areas which would provide the largest potential improvement to the storm water.
3. More frequent catch basin cleaning, specifically ensuring that no sumps shall be more than 50 percent full for catch basins serving catchments tributary to impaired waters, is not consistent with current cleaning processes, and we don't feel the benefit will be great enough to warrant the additional costs. Sweeping sidewalks a minimum of twice per year is also inconsistent with current practices and may require additional equipment and staff to implement.
4. The expanded public education program, especially the increased number of distributions to each of the four audiences, will also place an increased responsibility on the town. This is a requirement that would specifically require staff that is not currently available.

We recommend that the EPA ease some of the public outreach requirements and take the lead in this arena, or at least provide standard templates for communities to implement. Creating a statewide storm water educational program implemented by EPA or DEP would save each community critical budget and also standardize the process within the study area.

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5. The mapping, sampling, and associated timelines required as part of the increased illicit discharge detection and elimination program are unrealistic and overly aggressive given that each community will need to increase staff and budget to address these items. The paperwork alone would overwhelm existing staff and take resources away from more critical elements of the program. The necessary inventories and sampling would be easier to achieve over a longer period of time.

Many of these additional requirements will require the town hiring outside consultants which will again, lead to increased financial burdens. We estimate in whole that the additional Permit requirements will cost the town between \$100,000 to \$200,000 annually.

In summary, we feel that the permit schedule and requirements are too aggressive and burdensome to the individual communities, and we strongly recommend that the EPA consider delaying the implementation of these draft regulations until the comments and concerns from the impacted communities can be better taken into consideration. The requirements should be scaled back to address those areas which offer the best opportunity to improve storm water quality. We also recommend that when the regulations are implemented that they be done so in a longer phased fashion to better allow communities to realistically address the modifications necessary to the existing storm water management system. Lastly, we feel that if these requirements are put into effect, the EPA should provide grants or some type of funding mechanism to assist the individual communities to achieve the storm water goals outlined in the Permit.

We appreciate your consideration of these comments and look forward to forming a collaborative relationship toward the proper stewardship of our natural resources.

Sincerely,



Thomas Holder | Director
Department of Public Services

ECopy: Suzanne Kennedy – Town Administrator
David D’Amico – Deputy Director of Public Services
David Pellegrini – Tetra Tech Rizzo