



North Coastal MS4 comments

Roger to: Thelma Murphy

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Cc: David Webster, John Reinhardt, Patrick, Cynthia Liebman, "Steve Pearlman", "Kate Bowditch", "Woodbury, Catherine"

Please respond to ramjet

Thelma -

Thank you for the excellently run public hearing yesterday.

There are a few of my comments I need to expand upon just a bit:

Newton and other towns made the point that the best part of the 2003 MS4 permit was flexibility allowing cities to meet requirements in ways best suited to each town's situation.

I agree with that sentiment, and in my oral comments specifically suggested more flexibility in the sampling requirements which were - according to city testimony I heard - seen as the most onerous part of the new draft permit.

However, I am suggesting NO relaxation of the prompt and thorough IDDE investigations required by the new permit. There is still far too much sewage intermixed in regional stormwater - especially concentrated in higher density, higher impervious coverage areas.

While the 2003 permit had no specific sampling requirements, EPA learned a lot when it sent 308/309 letters to communities seen shirking even the minimal requirements of the first permit. The wet AND dry weather sampling for a large suite of analytes obviously informed the sampling requirements seen in this draft permit. However one size does not fit all, and a significant number of communities met and sometimes exceeded the requirements of the 2003 permit.

I suggest that adding maximum flexibility to the sampling requirements in the final permit (carrot) be specifically issued with the likelihood that individual permittees seen shirking in their work to conduct full IDDE investigations and fixes in a timely manner would have to implement the full set of monitoring requirements originally envisioned in the draft permit. (stick) I want cities to spend the maximum amount of available funds fixing known problems in the most cost-effective manner possible.

For all sampling conducted, I would like to see a requirement that all permittees place the data in EPA's WQX data exchange where neighboring MS4s will automatically have access to data on sampling at interconnections, and watershed groups and the public can access data without having to visit each MS4 on a quarterly basis to request the most recent data. (and even then get it only in paper form which allows analysis only after laborious transcription which could introduce errors!)

I would like to see specified in the definition of a New Discharge that stormwater discharge resulting from Sewer Separation is NOT a new discharge. While I read the current definition that way, the current wording is sufficiently ambiguous that Cambridge has stopped planning for at least two projects while awaiting such specific clarification.

I applaud the waiver for sampling at outfalls draining under 10% impervious area, but suggest that at least for this permit the percentage be raised to 20-25%. In sampling both urban and suburban locations over the last 10 years, I have seen a definite link between urbanization/impervious cover and likelihood of illicit connections.

While SSOs are barely mentioned in this permit, I want to stress that they are largely a STORMWATER problem. With the imminent MWRA permit rumored to include all member cities as co-permittees for the purpose of improving I/I problems leading to SSOs; and the equally rumored fierce fight and appeals by MWRA and communities to prevent this;...

Might specific provisions calling for bylaws, inspections and other measures to attack SSOs by keeping stormwater out of the sewers be better placed in this MS4 permit? Specifically as the MS4 mapping requirement finds catchbasins connected to the sewers, they should be removed; and all roof drains and sump pumps must be disconnected from the sewer system. Possibly this could be enacted as a requirement for inspection and certification of correct connection upon any property transfer - as has worked so well for Title 5 and septic system upgrades. Also, a goal could be set for limiting measured inflow as reported in the MWRA I/I report.

This report currently only gives yearly average numbers, but could easily be expanded to include calculated stormwater runoff coefficients into the sewer system, and to calculate what size and intensity of storm will fill local sewer systems and MWRA interceptors - so goals may be set and the lowest-hanging fruit attacked first.

SSOs in both community and MWRA systems are currently occurring roughly annually, and I would suggest a goal of NO SSOs except in a 5-year event. There will ALWAYS be a storm big enough to fill the system, but much more can be done to keep sewage in the pipes to see full treatment.

In oral comments, I argued extensively against monitoring requirements for pH. One argument I left out is that with extensive road salt usage in winter, there is heightened salinity throughout the year - more concentrated in urban areas - and this salt tends to act as a pH buffer which hides any problems which might otherwise be seen.

Thanks for this opportunity to comment. As I said at the hearing, I VERY much like this new draft permit, and believe I can see very large very real water quality improvement coming as a result!

sincerely,
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