

TOWN OF ANDOVER, MASSACHUSETTS

8



DEPARTMENT OF PUBLIC WORKS

WATER TREATMENT PLANT
397 LOWELL STREET 01810-4416
TEL (978) 623-8350 FAX (978) 623-8359

January 19, 2011

EPA Region 1
Office of Regional Administrator
5 Post Office Square-Suite 100-Mail Code: ORA01-1
Boston, MA 02109-3912

Attn: Kate Renahan

Re: Draft 2010 Small MS4 General Permit for Interstate, Merrimack and South Coastal Watersheds in Massachusetts

Dear Ms. Renahan:

In regards to the above draft permit, we wish to submit comments. The town has worked diligently to meet the requirements under the 2003 permit; however this has placed a burden on our staff and resources, which have been affected severely by budget cuts and layoffs in the difficult economic times which we are currently experiencing. During the course of the first permit term, we have been able to locate and inspect over 1000 town owned outfalls. The proposed requirements of Section 3.3 to conduct wet weather analytical monitoring at each of these outfalls will require extensive time and expense, which will further stretch our limited resources. The current budget situation with many municipalities is causing serious restrictions and the economic outlook for the near future is not expected to improve, making it very difficult to meet many of the proposed schedules and requirements. Please consider eliminating or relaxing the requirements relative to these comments in issuing the final permit decision.

Sincerely,

Brian W. Moore
Town Engineer

cc: Reginald Stapczynski, Town Manager
John Bean, Director of Public Works