



City of Marlborough

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Priscilla Ryder Conservation Officer

March 10, 2011

Environmental Protection Agency – Region 1
Ms. Kate Renahan
Office of the Regional Administrator
5 Post Office Square – Suite 100
Mail Code: ORA01-1
Boston, Massachusetts, 02109-3912
renahan.kate@epa.gov

RE: Comments on the Draft Massachusetts Interstate,
Merrimack, and South Coastal Small MS4 General Permit

Dear Ms. Renahan:

On behalf of the City of Marlborough DPW and Conservation Commission we have reviewed the Draft Massachusetts Interstate, Merrimack, and South Coastal Small MS4 General Permit and provide the following comments.

As a member of the Massachusetts Coalition for Water Resource Stewardship (MCWRS) we have reviewed their comment letter submitted to you in January 2011 (copy attached). We would like to echo the same comments presented in the MCWRS letter as the letter raises the same concerns we identified in the draft permit.

In addition to the WCWRS comments we would like to take this opportunity to emphasize the items that are of particular concern to us as follows:

Funding: The biggest concern we see with this permit is the additional costs the community will incur for: outfall monitoring and testing; public education and evaluation; and presumably more sweeping and catchbasin cleaning, than is currently preformed. With budgets shrinking, these additional costs will be much harder to absorb, and it will prove more difficult for communities to comply. Please provide an estimated cost of these added tasks, evaluate where cost savings can be gained (i.e. will wet weather results really provide meaningful data?) so that the burden on the community is less.

Timeline: Several of the timelines throughout the draft permit (SWMP section 1.10; SWPP sections 2.4.7.2) will be tight for a municipality to meet given budget constraints and the timing of the release of the permit in relation to the budget cycle. Please consider extending the time frame for implementation of these and other timelines so communities can properly budget for and have enough time to implement them.

Public Outreach section 2.4.2.2 - This section requires “the permittee to identify methods that it will use to evaluate the effectiveness of the educational messages and the overall education program.” It would be helpful for EPA to provide more specific guidance on how these evaluations are to be made and what sort of evaluation is expected so communities can assess the cost of these evaluations. As it stands there is no guidance on what the EPA is looking for here.

Outfall Monitoring Program 3.0- Please clarify in both the wet weather and dry weather testing requirement the standards needed for the bacteria testing. We have in house testing capabilities and can produce accurate results but are not a “certified” lab. If we can do this testing in our inhouse lab, the costs are significantly reduced. Please clarify this standard as we would like to use our inhouse capabilities.

3.3 Wet weather sampling- In communities, like ours, where we have a separate storm drainage and sewer system, wet weather sampling (unless it is a first flush sample) will likely not provide much useful data. Please explain how this data will be useful and why it is needed.

Regional Vocational High Schools- The city is home to the Assabet Valley Regional Technical High School, is the city responsible to include this facility in their SWMP or will the school need to address this themselves?

We appreciate the opportunity to submit comments on the Draft Massachusetts Interstate, Merrimack, and South Coastal Small MS4 General Permit. We look forward to hearing how you address these concerns.

Sincerely,

Priscilla Ryder
Priscilla Ryder
Conservation Officer

Thomas Cullen, Jr
Thomas E. Cullen, Jr. P.E.
City Engineer