

Dear Ms. Renahan:

The following comments/questions are offered by Worcester State University (WSU) in reference to the General Permits for Stormwater Discharges From Small Municipal Separate Stormwater Systems in Massachusetts Interstate, Merrimack and South Coastal Watersheds.

WSU Contact: Robert Daniels, Associate Director of Facilities: (508)929-8099 or e-mail rdaniels@worchester.edu

1. Section 2.1.1 c. For clarification could you please give examples of how a permittee would "become aware" that the discharge from an outfall exceeded water quality standards?
2. Sections 2.4.2/2.4.3- As a state university, we feel that there are sections of the permit such as Public Education and Outreach and Public Involvement and Participation which extend beyond the jurisdiction of our campus. We have interpreted the public to include our campus community. Is that what EPA had in mind for colleges and universities?
3. Section 2.4.6-As a state university, is an internal procedure considered adequate to meet the ordinance or regulatory mechanism requirement?

Thanks, Lucy

Lucille C. Servidio, CHMM, TURP
Senior Vice President
Capaccio Environmental Engineering, Inc.
Voice: (508) 970-0033 x114
www.capaccio.com * www.ems-hsms.com