



Town of Russell, Highway Department

162 Main Street Russell, Massachusetts 01071

Telephone (413) 862-6222 ~ Fax (413) 862-3101

December 20, 2016



Mr. Newton W. Tedder
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912

Dear Mr. Tedder:

We received EPA's notification that the Town of Russell is subject to the recently issued final Massachusetts MS4 permit and would like to request that EPA exercise its authority to grant an MS4 waiver for our Town.

We feel the MS4 permit waiver for Russell is justified for the following reasons:

- The population in our urbanized area is 596, well below the 1,000 person threshold for waivers.
- Bradley Brook, which flows through our regulated area, is listed as Category 2 (Attaining some uses; other uses not assessed). Please see enclosed maps that show entire urbanized area in Russell, and separate detail of northern and southern urbanized areas. Bradley Brook can be seen in the map of the entire urbanized area as well as the map detail of the northern area.
- Potash Brook and the Westfield River, which also flow through our regulated area, are listed as Category 5 (Requiring a TMDL), but the impervious cover in our urbanized area within these watersheds is minimal and therefore not contributing substantially to these water quality issues. Furthermore, these impairments appear unrelated to our urbanized area.
 - On Potash Brook (see map detail of the southern area), 5.16306 miles are impaired due to E. coli. Information collected as part of the Pioneer Valley Planning Commission's 2009 Westfield River water quality study indicates that the Potash Brook E. coli issue is likely tied to failing septic systems upgradient of our urbanized area.
 - On the Westfield River the impairment for turbidity begins above our urbanized area at the confluence with the Middle Branch of the Westfield River and extends below our urbanized area to the Route 20 bridge in Westfield, a total of some 17.8 miles. The turbidity problem may have more to do with the operations of the several dams in this stretch as indicated by the recommendations in the 2001 Westfield River Water Quality Assessment Report, page 62.

- We have corresponded with MassDEP Stormwater Coordinator Fred Civian about our request and he supports the granting of an MS4 waiver for the Town of Russell. (Please see his December 19, 2016 e-mail attached.)

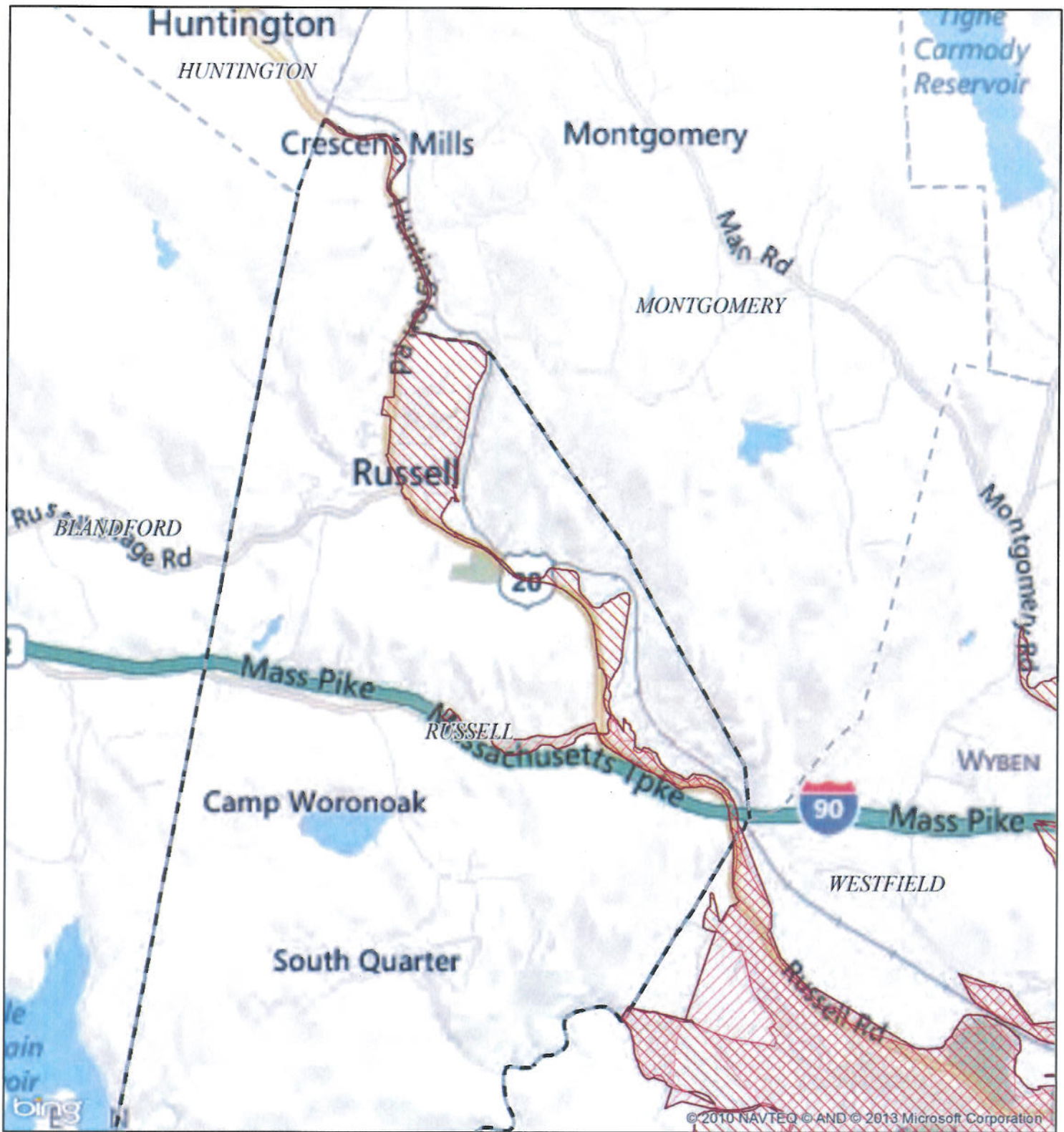
Thank you for your consideration of our waiver request.

Sincerely,



John Hoppe
Highway Superintendent

Attachments: EPA Regulated Area Map of Russell
Map of Russell, showing urbanized area and impaired waters
Map enlargement of urbanized area and impaired waters - North
Map enlargement of urbanized area and impaired waters - South
12-19-16 message from MassDEP Stormwater Coordinator Fred Civian

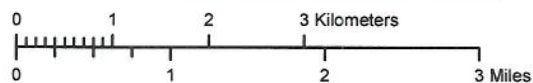


NPDES Phase II Stormwater Program Automatically Designated MS4 Areas

Russell MA

Regulated Area:

UA Based on 2000 Census	UA Based on 2010 Census
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Town Population: **1775**
Regulated Population: **596**
(Populations estimated from 2010 Census)

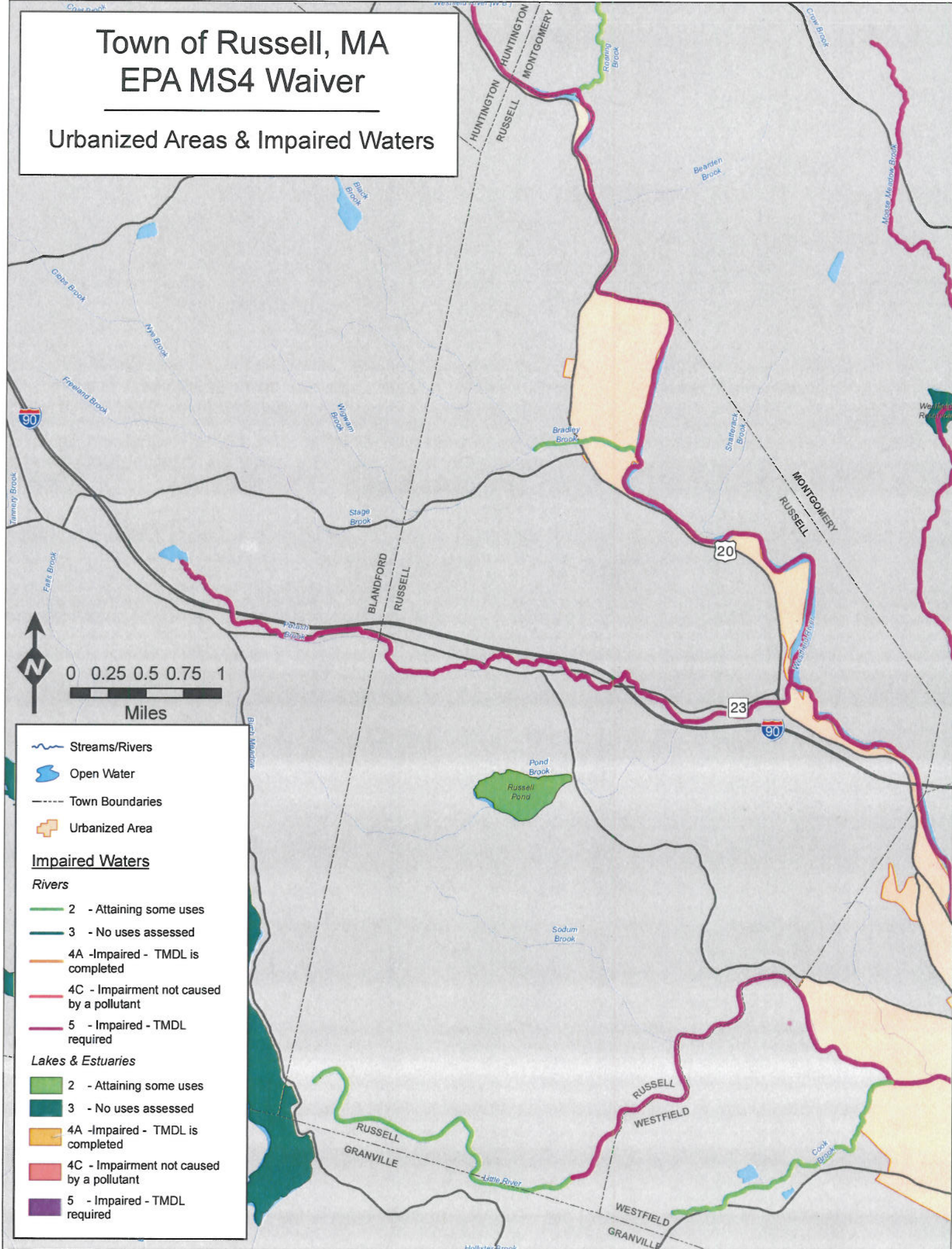


Urbanized Areas, Town Boundaries:
US Census (2000, 2010)
Base map © 2013 Microsoft Corporation
and its data suppliers

US EPA Region 1 GIS Center Map #8824, 8/9/2013

Town of Russell, MA EPA MS4 Waiver

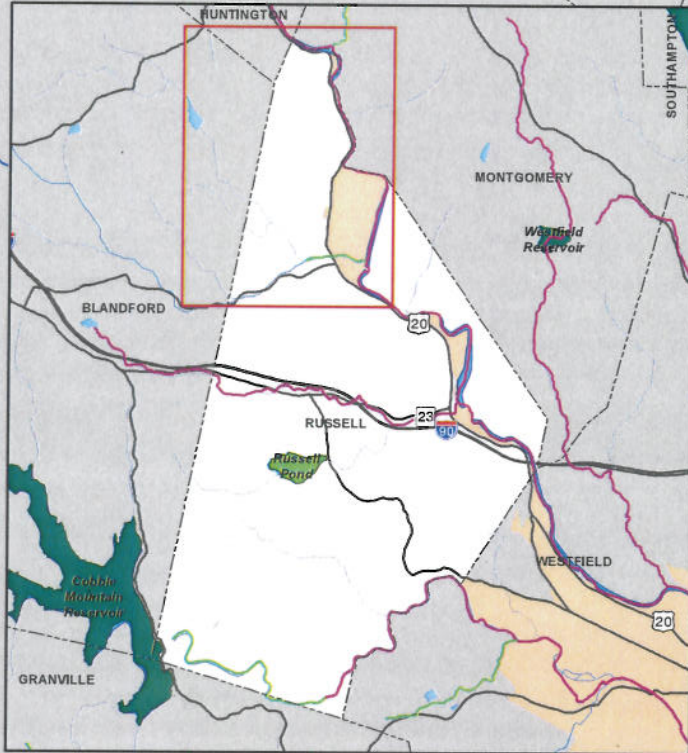
Urbanized Areas & Impaired Waters



Town of Russell, MA EPA MS4 Waiver

Urbanized Areas & Impaired Waters North

Extent Indicator Map



Streams/Rivers

Open Water

Town Boundaries

Urbanized Area

Building Footprints

Impaired Waters

Rivers

2 - Attaining some uses

3 - No uses assessed

4A - Impaired - TMDL is completed

4C - Impairment not caused by a pollutant

5 - Impaired - TMDL required

Lakes & Estuaries

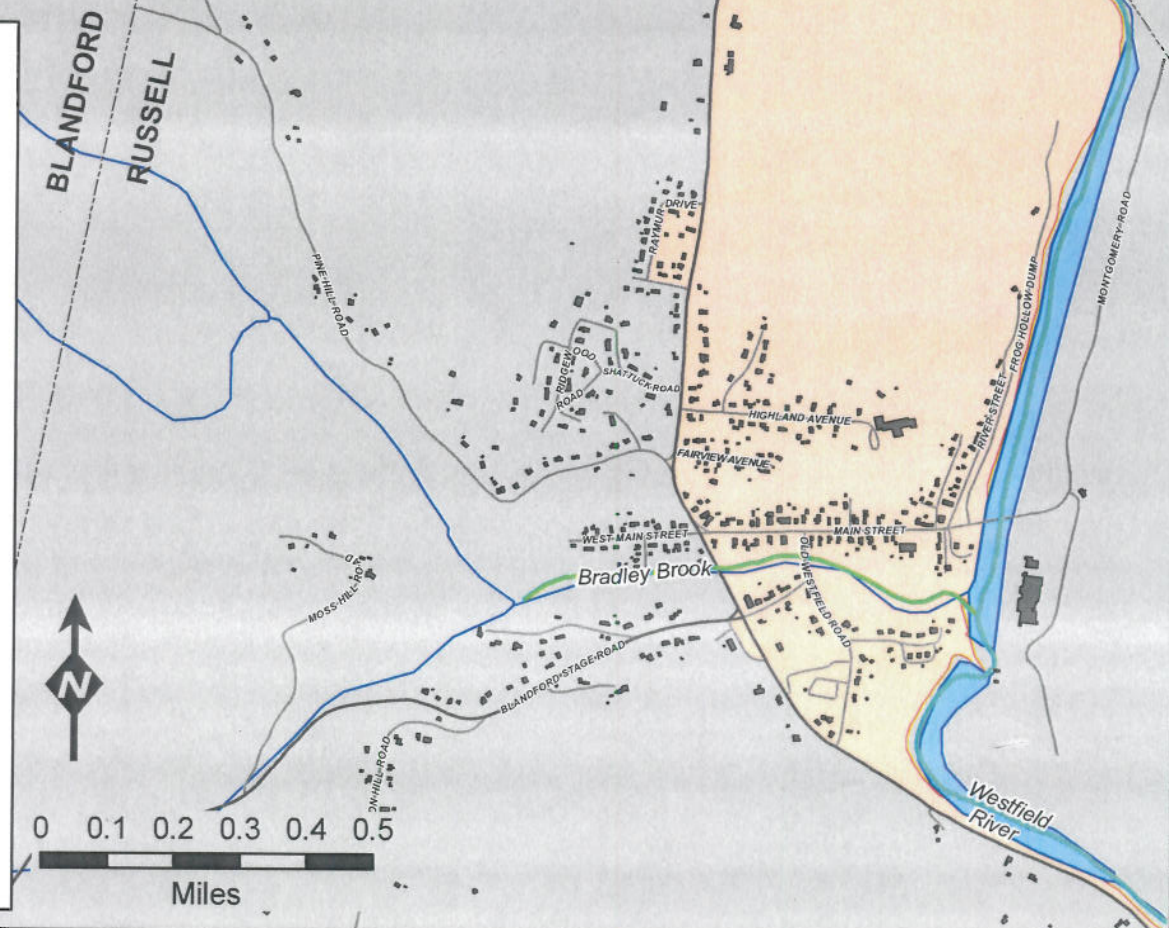
2 - Attaining some uses

3 - No uses assessed

4A - Impaired - TMDL is completed

4C - Impairment not caused by a pollutant

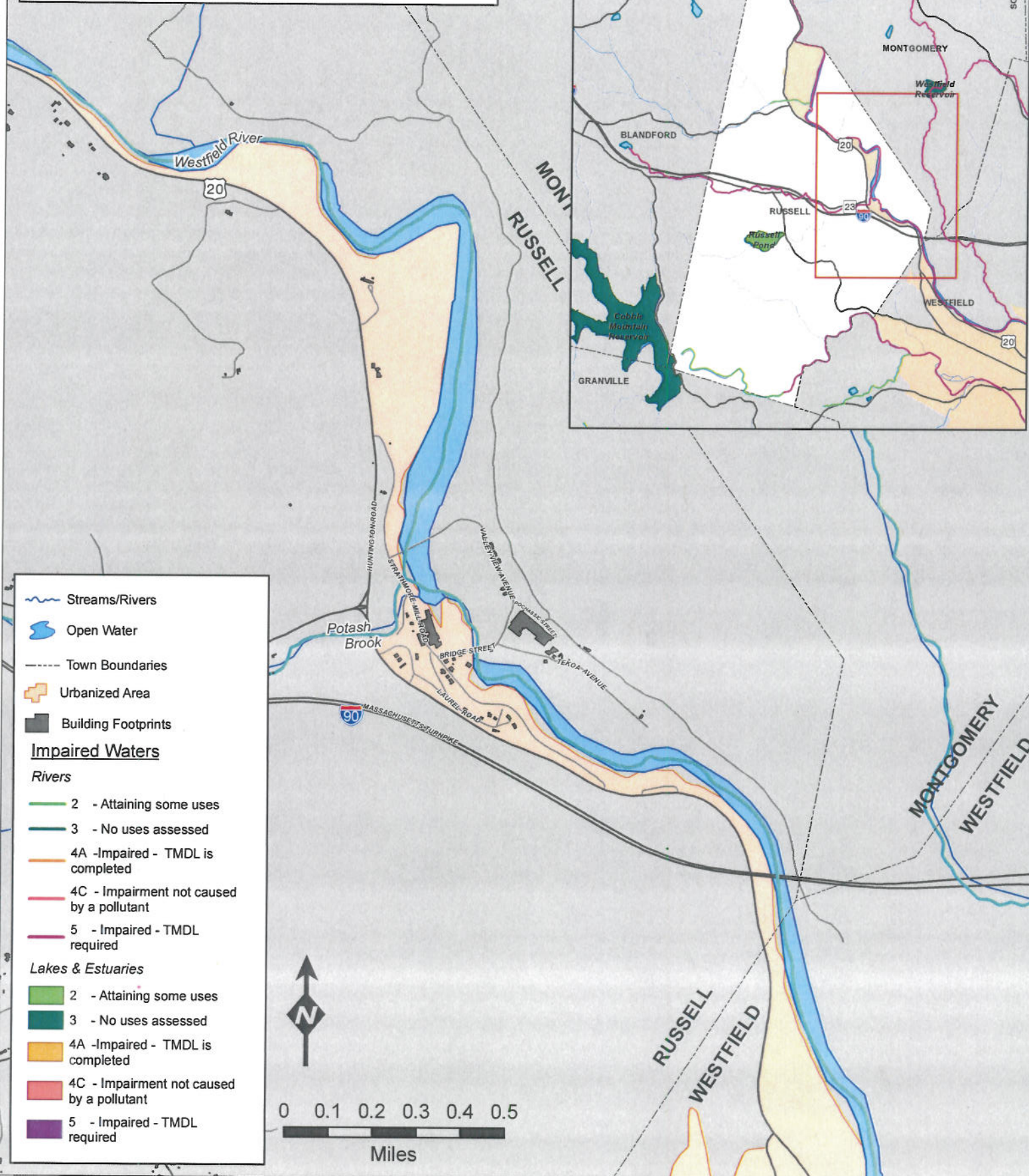
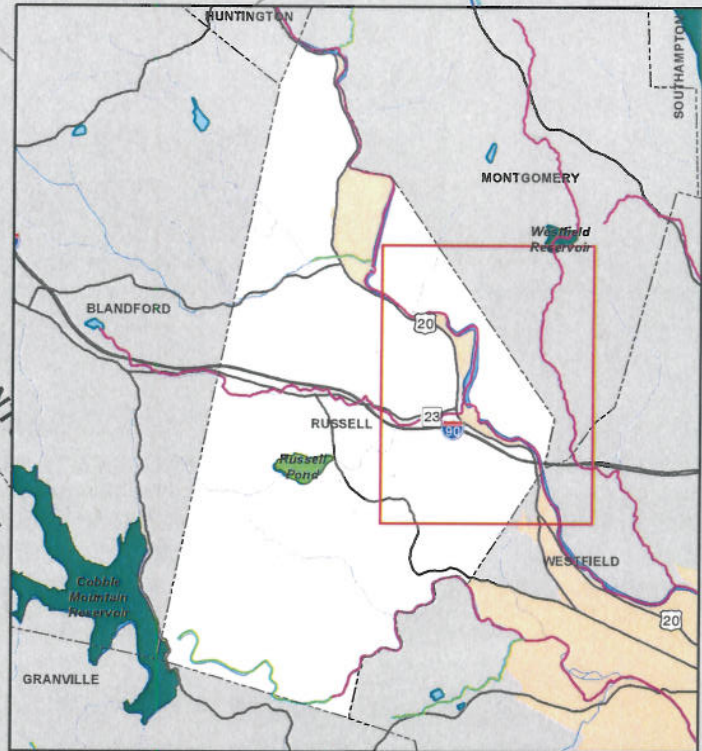
5 - Impaired - TMDL required



Town of Russell, MA EPA MS4 Waiver

Urbanized Areas & Impaired Waters South

Extent Indicator Map



Streams/Rivers

Open Water

Town Boundaries

Urbanized Area

Building Footprints

Impaired Waters

Rivers

2 - Attaining some uses

3 - No uses assessed

4A - Impaired - TMDL is completed

4C - Impairment not caused by a pollutant

5 - Impaired - TMDL required

Lakes & Estuaries

2 - Attaining some uses

3 - No uses assessed

4A - Impaired - TMDL is completed

4C - Impairment not caused by a pollutant

5 - Impaired - TMDL required



0 0.1 0.2 0.3 0.4 0.5

Miles

Gambarini, Patty

From: Civian, Frederick (DEP) [frederick.civian@state.ma.us]
Sent: Monday, December 19, 2016 11:09 AM
To: Gambarini, Patty
Subject: Russell waiver request

Patty –

I've reviewed the request you've composed to have EPA issue an MS4 permit waiver to the Town of Russell.

It looks both complete and well-reasoned.

With Russell having fewer than 600 people living in its Urbanized Area, MassDEP endorses the waiver request.

Sincerely,

Fred

Frederick Civian

MassDEP Stormwater Coordinator

617-292-5821

<http://www.mass.gov/eea/agencies/massdep/water/wastewater/stormwater.html>



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of Environmental Progress**