

PP-1

Doug Halley

From: Nancy Bryant [info@suasco.org]
Sent: Wednesday, March 26, 2008 8:38 PM
To: Correia, Debi; Gifford, Mark; Healy, Mary; Alkhatib, Abdul; Balduf, Carl; Bubier, Sally; Caldwell, Steve; Jane Ceraso; Clyde, Jim; Conway, Kelley; Cote, Joyce; Coviello, Mark; Curran, John; Danos, Savas; Digiacomo, John; Dineen, Debbie; Dowdy, Kristin; Duhani, Toma; Durling, Eric; Flood, Gerard; Fogg, Steve; Galligan, Karen; Gaucher, J.T.; Doug Halley; Hansen, Linda; Jahnle, Stephen; John, Adrienne St.; Kamel, Max; Litchfield, Fred; MacLeod, Diana; Marques, Tony; Monahan, Brian; Papadopoulos, Christina; Place, William; Sadwick, Steven; Stankovich, Michael; Starratt, Paul; Stein, Michele; Turkington, Frederic; Valente, Maureen; Vignale, Michael; Weeks, Katy; Woodsmall, John
Subject: SWCAP Year 5 Product delivery

Greetings SWCAP Year 5 Clients:

I have good news and bad news. First the bad news: as you may have already noticed, we are running a bit late on delivery of your Stormwater Year 5 Product. I will be ready to deliver in mid-April, during the week of April 14 or April 21. I will be in touch with you on my delivery schedule as we draw closer to the date. Now the good news: although you were invoiced for 5 ads in the Year 5 program, we have created 7 ads so you will be receiving more product for the same price!

A reminder of the elements of the SWCAP Year 5 Product: Year 5 is a "Stormwater Ad Campaign". The campaign focuses on 7 stormwater topics: what is stormwater, no dumping down storm drains, littering, car care, lawn care, pet waste, and low impact development techniques. The ads feature catchy slogans and eye-catching imagery along with succinct explanatory text in layman's language. The ads will be in several formats: postcard, poster, website, and cable tv. I'll be delivering hundreds of postcards and several sets of posters, as well as a CD of the postcard and poster files in case you want to print more. You'll also receive a website-compatible version of the ads for your website and a CD of the ads for your cable tv station. The ads have been favorably reviewed by EPA and DEP, and I am presently incorporating their comments before sending the materials out for production. I think you'll be very pleased with this innovative ad campaign!!

Just as an fyi: the Stormwater Community Assistance Program plans to host a Stormwater Forum in late May or June which will focus on the next five years of the Phase II permit, low impact development bylaws and techniques, and stormwater utilities and fee mechanisms. I will keep you posted as plans for the Forum crystallize.

I have attached a powerpoint presentation that Thelma Murphy from EPA delivered earlier this year on Stormwater Phase II.

Also I wanted to forward to you that Stephen Jahnle, Assistant Town Engineer in the Chelmsford DPW wrote me that Chelmsford's Phase II program was audited by EPA in January. The auditor was Andrew Spejewski, an environmental engineer from the office of environmental stewardship at EPA. Stephen wrote that the auditor "...went through the permit top to bottom asking all kinds of questions, looking at our logs/documents of inspections, site visits to construction sites and municipal operations and going through our plan review processes. His initial impression was we are doing well, but we are behind on the creation and implementation of a bylaw or ordinance, but that process is currently underway. We should be getting a draft report from him in a few weeks, prior to the issuance of a final report."

Stephen was curious as to whether anyone else has been or is in line to be audited? Stephen's contact

info is 978-250-5228.

Please don't hesitate to contact me with any questions.

I look forward to delivering the SWCAP Year 5 product to you in April.

Sincerely,
Nancy Bryant

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Current Phase II Implementation and the Next Generation Permit

Thelma Murphy
EPA – New England

Topic to be Covered

- Brief program overview
- Current permit conditions and program implementation
- A look towards the next permit

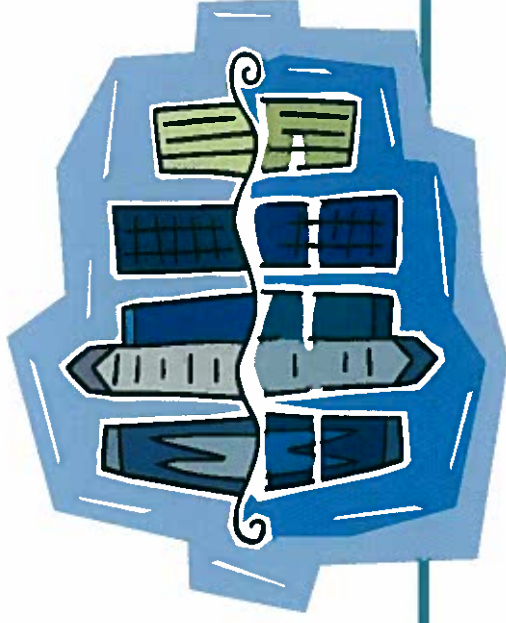
A Snap Shot of Storm Water in MA

- 237 traditional municipalities
- 37 non-traditional municipalities
 - Mass Highway, DCR, colleges etc.
- 13 municipalities with waivers

Key Dates

- Phase II promulgated in December 1999
- First general permit issued May 2003
- First Notice of Intent – due July 2003
- Annual Report – due May 1
- Permit expires – May 1, 2008

Permit Conditions and Program Implementation



Measurable Goals

- What the heck are they?
- A good goal must be trackable or a measure of quantity/quality
- Includes a wide array of indicators
- Includes various methods of measurement
- Should be used to evaluate program effectiveness

Common Implementation Issues

- No intradepartmental coordination
- No formal program framework
- Program priorities not identified
- Non-measurable goals expressed
- No evidence of revisions of program based on evaluation

Public Education

- **Implement a program to distribute material to the community**
- **Provide information about storm water impacts**
- **Address steps the public can take to reduce impacts to storm water**

Public Participation

- All public involvement must comply with state public notice laws
- Provide opportunities for the public to participate in development, implementation and review of the Storm Water Management Program

Expectations

- Ultimate goal – change in behavior and knowledge
- Program focus on specifics concern of the community
- Program should be progressive
- Thought should be taken concerning:
 - What is the message
 - Who is the audience
 - How will it be packaged
 - How will it be evaluated

Common Issues

- **Not targeted to a specific audience**
- **Inadequate distribution**
- **Not a lot of focus on water quality improvements or behavioral changes**

Illicit Discharge Detection

- Map of all outfalls and receiving waters
- Ordinance, or other mechanism, to prohibit non-storm water discharges
- Develop and implement a plan to detect and eliminate illicit discharges
- Train employees

Expectations

- A useful map –
- Written procedure for locating, eliminating and removing illicit connection
- Plan for prevention and spill response
- Legal authority/Ordinance
- Records for tracking
- Employee training

Common Issues

- Program often reactive instead of proactive
- Lack of documentation or written procedures
- Method for identifying the source of an illicit discharge

Construction

- Ordinance to require sediment and erosion control
- Sanctions to ensure program compliance
- Procedures for site plan review
- Procedures for inspection and enforcement

Post Construction

- Ordinance, or other mechanism, to address post construction run off from new development and redevelopment
- Procedures to ensure long term operation and maintenance of BMPs

Expectations

- **Ordinance/regulatory mechanism**
- **Design standards and/or BMP manuals**
- **Plan review- pre-construction meetings**
- **Inspections- during and after**
- **Post construction review**
- **Enforcement procedures**

Common Issues

- **Problems with inspectors and inspections**
- **Review of plans – are the right people looking at them**
- **Authority to enforce ordinance**
- **Management of post construction BMPs**

Good House Keeping

- Develop and implement a program to reduce pollutant runoff from municipal operations
- Employee training

Expectations

- **Maintenance tracking systems and standard operating procedures**
- **Identification of ALL municipal facilities**
- **Employee training**
- **Management of pesticides, herbicides and fertilizer**
- **Winter activities-management salt/sand**
- **Flood management**

Common Issues

- Plans and procedures are not written
- Maintenance not scheduled or tracked
- Employees not trained
- All activities not included

Other Conditions

- **Focus efforts on priority waters**
 - Public swimming beaches – coastal waters
 - Public drinking water supplies
- **Evaluate infiltration opportunities**
 - Loss of annual recharge should be minimized

Water Quality Considerations

- Identification of all 303(d) waters that receive a discharge from the MS4
 - Identify pollutants of concern
 - Implement BMPs to address the pollutants
- Identification of approved Total Maximum Daily Loads
 - Program must be consistent with the terms of the TMDL

A Look Ahead



Next Permit

- Proposal Spring 2008
- Greater details in MCM #3 and MCM #6
- More specific conditions for
 - TMDL compliance
 - Discharges to impaired waters
 - Expected BMPs

Topics Under Discussion

- Designation of additional MS4s
- Content and timing of the next Notice of Intent
- Procedures for public notice
- Monitoring

Contact Information

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