CRWA
Saving the Charles River since 1965

February 26, 2015

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Re: Draft Massachusetts MS4 Permit

Dear Mr. Tedder:

Charles River Watershed Association (CRWA) has reviewed the draft Small Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) general permit for Massachusetts (draft permit). CRWA, a research and advocacy organization formed in 1965, works extensively on stormwater pollution issues, and we have conducted research and modeling on phosphorus pollution in the Charles River; undertaken wet weather end-of-pipe and receiving water monitoring programs; and designed and constructed stormwater improvement projects. We work in partnership with agencies, municipalities and organizations across Massachusetts.

We are strongly supportive of EPA's efforts to improve stormwater management in the Commonwealth and urge the agency to finalize the permit (with the modifications discussed below) as expeditiously as possible. We join in the comments of the Massachusetts Rivers Alliance on the draft permit and submit the following additional comments.

General

The draft permit reflects EPA's significant commitment to the progress that has been made over the past decade in the science and regulation of stormwater management. Stormwater is a major source of pollution impacting the health of the Charles River today and preventing it from achieving water quality standards. It has been amply demonstrated through research, demonstration projects and several successful stormwater programs that stormwater pollution can be significantly reduced, resulting in measurable improvements in receiving water quality, habitat restoration, and improved hydrologic function. The draft permit reflects this and it is an important regulatory tool that when paired with additional stormwater regulatory programs and permits, will provide meaningful protections for surface waters.

The Stormwater Phase II program was intended to be an iterative program; understandably, the 2003 MS4 general permit no longer reflects current best practice for municipal stormwater management and

does not result in achievement of water quality standards.[1] We believe the new permit will drive LID and green infrastructure—critical, timely approaches that will also help to reduce flooding through onsite stormwater retention. The permit will also facilitate compliance with "The Draft MEPA Climate Change Adaptation and Resiliency Policy" now being developed and vice-versa.

This permit provides permittees with clear guidance and support for their stormwater management programs. In particular, we note the highly detailed technical analyses undertaken by Region 1 staff and their consultants to understand and share with permittees and the public the physical, technical and fiscal implications of the new permit. We believe the tools and guidance documentation EPA has provided to assist municipalities in developing sound, fiscally responsible programs will be of tremendous benefit.

By providing standardized methodologies for permittees to estimate current loads, and the reductions they can achieve using a variety of measures, EPA has also created a fair and level playing field, and reduced the burden on permittees to develop their own methodologies.

Appendix F: Requirements for Discharges to Impaired Waters with TMDLs and Attachments

CRWA is strongly supportive of the development of the detailed appendix and attachments to assist in the development of phosphorus control programs (PCPs) to achieve phosphorus reductions consistent with wasteload allocations (WLAs) in TMDLs.

Timelines and Milestones

There has been significant discussion, review and public input to EPA about its proposed MS4 program updates over the past five years. This draft permit, which follows the New Hampshire draft MS4 permit (2013) and the draft General Permit for Massachusetts North Coastal Watersheds (2010) does not come as a surprise to covered municipalities. Small MS4 permittees have had ample opportunity to develop stormwater management programs over the past decade and have also had many years to prepare for the more stringent requirements that are necessary to meet the objectives of the Clean Water Act. Given this, and the pressing need for immediate action to control nutrient-polluted runoff in the Charles, the Phosphorus Control Plan (PCP) timelines in the draft permit in Appendix F should be shortened considerably. Twenty years—well beyond the life of this permit—to complete implementation of the PCP Plan in the Charles River Watershed is unwarranted, not environmentally protective, and in our opinion, not legal. We note that under the permit as currently drafted, only 25% of the necessary phosphorus load reduction in the Charles watershed is required to be achieved in the next decade;[2] the draft permit is back-end loaded with 50% of the total phosphorus reduction not required until years 15 to 20 of the permit.

Allowing five years from permit effectiveness[3] for creating the PCP Phase 1 Plan is far too long. Municipalities will not even be required to have completed ***creation of the Phase I Plan*** until this

[1] The Massachusetts Stormwater Standards will also need to be updated to reflect the draft permit conditions and current stormwater management practices and science.

[2] The first phosphorus reduction milestone is not until 8 years after the permit effective date.

[3] EPA intends to make the new MS4 general permit effective six months after it is finalized.

five-year permit has expired! CRWA strongly believes that two years from permit effectiveness is reasonable for creating the PCP Phase 1 plan with full implementation of the Phase 1 Plan and development of the Phase 2 Plan by permit expiration, or within 5 years. We believe it is feasible for municipalities in the Charles to implement programs and practices to achieve at least half of their total phosphorus load reduction (Phase 2) requirements within seven years of the permit's effective date, and to create the Phase 3 Plan, with Phase 3 Plan implementation completed by year 10. We urge EPA to adopt these shorter, reasonable timeframes.

The milestones are especially important given the poor performance of some municipalities and non-traditional MS4s under the 2003 MS4 permit. While Appendix F does contain milestones which will help to ensure that municipalities are making progress in creating and implementing the PCP, the timeframes for the milestones are so long, we think they may well stall momentum, rather than build it.

Moreover, some of the planning in the milestones would benefit from being done simultaneously. For instance, there is no reason to give permittees five years to provide a description of planned nonstructural controls, let alone another year to implement these types of controls. The enhanced non-structural BMPs (Attachment 2 to Appendix F) can and certainly should be implemented within the first two years of the permit. Similarly, the legal analysis, funding source assessment, and definition of phosphorus baseline/reduction/allowable load[4] should take place at the same time. We think a funding source assessment (year 3, item 1-2) makes little sense until the PCP scope is defined (year 4, Item 1-3) and should be switched.

Annual Reporting

Reporting on progress and compliance with PCP milestones should be required in each annual report, rather than beginning six years after the permit effective date. As we read Appendix F in conjunction with Part 4.4,[5] PCP development progress would be virtually unmonitored for the first six years of the permit. Our concern is that until there is an actual reporting deadline, little progress may actually be made in some communities. Either Appendix F or Part 4.4. should be modified to require reporting on PCP progress, planning, implementation and the milestones in each annual report.[6] Appendix F should also be modified to require, rather than "to encourage," on line posting of each Phase of the PCP. Since permitees are required to make the Phases of the PCP available for public comment during development, it makes sense to post the PCP Phases on line.

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[4] EPA provides Tables F-2 and F-3 to enable permittees to determine their Phosphorus Baseline Load, Reduction Requirement and Allowable Load, depending on whether the permittee opts to implement the PCP in all areas within its jurisdiction or in the regulated MS4 area only.

[5] Section 4.4b.iii prescribing the contents of annual reports provides only that discharges subject to TMDL related requirements must identify specific BMPs used to address the pollutant and an assessment of effectiveness in controlling the pollutant "and any deliverables required by Appendix F."

[6] While Appendix F requires that performance evaluations be included in each permittee's annual report, those evaluations do not begin until 6 and 7 years (Phase 1) after permit effective date, and then in years 11 and 12 (Phase 2) , and 16 and 17 (Phase 3) thereafter.

We commend EPA for providing a methodology for calculating phosphorus load increases due to development and phosphorus load export rates. We also agree that to receive credit, conversion of impervious surfaces must be restored to provide hydrologic functioning.

IDDE "Credit"

A serious problem in the draft methodology, however, is the phosphorus reduction from IDDE subtracted to determine the stormwater-only phosphorus load reduction requirement for each municipality. This reduction, in effect a "credit" granted to permittees for IDDE, is inconsistent with the methodology used to estimate the existing phosphorus load, and does not appear to be consistent with the way WLAs were calculated in phosphorus TMDLs. We strongly urge EPA to eliminate this illicit phosphorus load default value.

Watershed models, TMDLs and watershed assessments by the nature of their scale and design, use well-established methodologies for estimating typical or average stormwater pollution loads and apply these rates across a broad area based on land use types, topography, soils and other statistically relevant factors. Even models that use more detailed hydrologic routing, rainfall data, and dynamic in-stream processes rely on some averaged or typical measured concentrations which are applied across a modeled area. Discharges from Illicit connections are sporadic, geographically isolated, and difficult to separate out from other sources of stormwater pollution in a modeled condition. They are not generally included in such models except as they may influence the overall average concentration of a pollutant in stormwater. Furthermore, TMDLs do not include a WLA for illicit discharges because they are not allowed under the permit and thus cannot have a maximum daily load allowance.[7]

Since these illicit discharges have not been explicitly included in estimating existing loads, it is not appropriate to give them credit when estimating reductions. Furthermore, from a practical perspective, CRWA has demonstrated with sampling and modeling that stormwater loads – even those with no apparent illegal connections whatsoever – can still cause significant violations of water quality standards in receiving waters. Clearly, the MS4 general permit is intended to focus on a permittee's stormwater management, and its phosphorus reduction credits should reflect improvements in stormwater control and treatment, not basic, required corrections of failing sewage infrastructure.

Notably, as the map attached to our comments shows, Dover, Holliston, Mendon, Norfolk, Sherborn, Wayland, Weston and Wrentham are entirely on septic; and Bellingham and Millis have little sewage infrastructure. Yet the default phosphorus load reduction for IDDE work in Table 15 is applied to each of them. This is erroneous.

CRWA believes that in the case of a general permit, where highly detailed site specific data is not being used to establish permit requirements, this is inappropriate. At a minimum, the reduction should be limited to no more than five percent and then only applicable in those communities with the potential to have a high number of illicit connections/discharges.

[7] Nor does EPA explain the basis for its determination that an estimated 10% of the calculated phosphorus load from the commercial, industrial and all residential land use groups is due to illicit sanitary discharges to the Charles, or its statement that the "illicit phosphorus load estimate is based on considering the magnitude of illicit loads that have already been identified and eliminated from communities with the CRW." Fact Sheet Attachment 1 at 21.

Attachment 2

CRWA applauds EPA for developing calculation methods and tools that are sufficiently robust to provide a high level of confidence they will achieve required control levels, and yet are simple enough to be of great assistance to permittees, providing clarity, certainty and cost-savings.

It is not clear to CRWA whether the export load rates for pervious soils in Table 2-1 should be broken out by soil type. Those for hydrologic soil group D (DevPERV HSG D) which will be the default soil group used in many instances because there is not sufficient site specific data, seem very high. We think it is more appropriate to use an average load rate, or at least to use HSG C if there is no information available.

A proper bar is set in the draft permit to receive credit for no application of fertilizers containing phosphorus: "the application of any fertilizers that contain phosphorus at any time during the reporting year within the permittee's regulated area shall preclude the permittee from earning this credit for the reporting year." While the MA Department of Agricultural Resources is promulgating phosphorus fertilizer regulations, the act authorizing the regulations, G.L. c. 128, § 65A, is not, as EPA characterizes it, a "Massachusetts phosphorus fertilizer ban." Rather, this statute addresses signage in stores to discourage its use, but does not ban its sale and specifically allows application "where a soil test indicates that additional phosphorus is needed for growth of that lawn or non-agricultural turf "and in "establishing a new lawn or new non-agricultural turf area. " We question the default values in Table 2-5, which seem high—but just as importantly, we do not think communities will be able to certify accurately that phosphorus fertilizer is not being used in the MS4 regulated area.

Attachment 3

CRWA believes the resources EPA has put into developing methodologies and calculation tools for estimating the phosphorus removal of structural BMPs serve as an outstanding resource for permittees and the public. Over time, as more data becomes available, and more practices are evaluated specifically for phosphorus reduction, EPA may wish to change the credits allowed. We suggest that language be added at the beginning of Attachment 3 that calculations should be based on the most up to date versions of the Tables and Charts, which may be modified, and also direct permittees to a website where such updates will be made available.

We also encourage EPA to continue to evaluate structural practices' effectiveness over time, as well as their effectiveness at removing different types of phosphorus and phosphorus in different states of availability. As new research emerges, the methodologies and calculation tools should be modified accordingly.

<u>Appendix H Requirements Related to Discharges to Certain Water Quality Limited Waterbodies</u>

Few segments are listed for chloride impairment yet many water bodies are in fact "water quality limited" due to chloride. Rather than limit the requirement of a Salt Reduction Plan with additional or enhanced BMPs to 303(d) and 305(b) listed waters, we recommend that EPA include this under good housekeeping and pollution prevention measures in Part 2.3.7 of the permit and also be incorporated as requirements in post-construction bylaws.

Additional Comments on the Draft Permit

1.10 Stormwater Management Program (SWMP)

We suggest Part 1.10c. be modified to read "The permitee shall maintain an adequate funding source . . . " (emphasis added). "Encouraging" adequate funding for the program is not an appropriate permit condition and we are troubled that it provides the appearance of a potential loophole for permit compliance. If the permit cannot be modified to *require* adequate funding, this section should be removed. The development of a compliant program is a requirement of the permit and failure to identify sources of funding cannot be used as an excuse not to do so.

1.10.1.b. Stormwater Management Program Availability

We strongly support the requirement to make the SWMP available on line. Any permittee unable to post its SWMP on line should be required to explain why it cannot do so, and provide a reasonable alternative repository of free copies. We propose the same for Annual Reports (Section 4.4) which will provide transparency and allow residents to track permit compliance progress.

1.10.2 Contents of Stormwater Management Program

This section should contain language requiring the permittee to use (or at a minimum demonstrate that they have considered using and reasons for rejecting) Low Impact Development (LID) and Green Infrastructure (GI) techniques as part of their program to comply with Parts 2.0, 2.1 and 2.2, as has been required to demonstrate compliance in Part 2.3.5c.v. If permittees do not use LID or GI techniques as part of their program to comply with water quality based effluent limitations (Part 2.1) and discharge to impaired waters (Part 2.2), they should discuss why they have been determined not to be feasible. Current best practices in stormwater management in urbanized areas clearly include the use of LID and GI, and many EPA-approved programs including CSO Control Plans, Settlement Agreements and Consent Decrees require LID and GI practices. See, also,
http://water.epa.gov/infrastructure/greeninfrastructure/gi_regulatory.cfm
The LID and GI requirements should also be specified in Parts 2.2.1.g. and 2.2.2.a.

2.1.1 Requirement to Meet Water Quality Standards

The last sentence of both 2.1.1.b. and 2.1.1.c. and the first sentence of 2.2.2d. should be eliminated. While EPA would certainly exercise enforcement discretion if a permitee is complying with all "applicable requirements and BMP implementation schedules" in Appendices F and H, it is very important that this not serve as a shield to avoid eliminating expeditiously those conditions causing or contributing to an exceedance of water quality standards when the plan turns out to be inadequate or there is a newly discovered discharge.

Section 2.2 Discharges to Certain Impaired Waters

CRWA appreciates the listing of municipalities with discharges subject to TMDLs or to certain water quality limited waters. However, in Part 2.2.1 we suggest clarifying language be added that as new TMDLs are approved, the municipalities covered by them will be subject to Appendix F requirements and that the SWMP shall be modified to comply with new WLAs or new requirements. Pursuant to 2.2.2, a water quality limited water body (not meeting applicable water quality standards) does not have to be listed in categories 5 or 4b on the 303(d) or 305(b) lists to be subject to Appendix H requirements. We understand that a permittee not listed in these sections is subject to Appendix H requirements once it becomes

"aware" that it is discharging to an impaired waterway or tributary, we are concerned about the latitude this may provide permitees.

2.3.2 Public Education and Outreach

It is not clear what EPA means by requiring the permittee to "at a minimum consider" the topics in Part 2.3.2.d.i-iv when developing its outreach/education program. These are basic topics that will be relevant to almost all MS4 communities. Accordingly, we recommend changing the word "consider" to "include." The requirement of two messages to each audience in Part 2.3.2.b. over the permit term (8 messages total) is a very low bar. In order to comply with the objective of this section to "increase knowledge and change behavior of the public so that pollutants in stormwater are reduced," permittees should be required to distribute educational materials to each sector at a minimum of once per year during the permit term.[8] Given opportunities to collaborate with other MS4s, MS4 consortiums, and watershed associations, we think this is reasonable.

2.3.3. Public Involvement and Participation

This is a very important requirement that will result in an effective stormwater management program and public support for it. In addition to public participation in review and implementation of the SWMP, the permit should require public participation the self evaluation component.

2.3.4 Illicit Discharge Detection and Elimination (IDDE) Program

CRWA strongly supports the revised methodology and detailed approach to the IDDE program in the draft permit. Illicit discharges remain a persistent problem, and an aggressive, standardized approach to detection and elimination is necessary to achieve water quality standards and reduce the impacts of storm drains and sanitary sewer systems on receiving waters. The written IDDE program (Part 2.3.4.7.) should be required to be posted and updated on the MS4's website.

2.3.4.4 Sanitary Sewer Overflows

CRWA suggests the language and requirements in this section be strengthened, with a particular focus on locations where repeated SSOs are identified. In spite of the permit specifications that SSOs are unlawful, the primary requirements of this section remain focused on inventorying and reporting SSOs. The requirement to eliminate an SSO as "expeditiously as possible," while good, seems somewhat subjective and remediation requirements should be spelled out in this section. In practice, many municipalities have ongoing and recurring SSOs, which they are not moving "expeditiously" to eliminate, nor are they aggressively taking interim mitigation measures to minimize the discharge of pollutants unless EPA begins enforcement proceedings. As the permit does in other parts, we suggest that specific required remedial measures for areas with recurring SSOs be spelled out in this section. A requirement to notify the local watershed association orally and in writing at the same times specified for the permitee to notify EPA and DEP should be a permit requirement.

2.3.4.6 Revised Mapping

As the permit recognizes, mapping was required to be completed during the 2003 MS4 permit term. Mapping is a basic first step in MS4 stormwater management and permit compliance. While 2.3.4.6.c. requires permittees to report on progress toward completing the revised mapping in each annual report,

[8] This provision is also important since the permit could well be administratively continued for a number of years as has been the case with the 2003 MS4 general permit.

because only one annual report should occur before mapping is completed and the second annual report is filed, we recommend this language be modified to: "The permittee shall report on progress toward the completion of the map required by this permit in its first annual report and shall report on its completion in its second annual report. If not completed within two years, the permittee shall provide the reasons therefore and the expected date of completion in each annual report."

2.3.4.8 IDDE Program Implementation and Milestones

A date for completion of elimination of illicit connections identified as a result of the Catchment Investigation Procedure (Part 2.3.4.8c.iii) should be a permit condition. As discussed above, we suggest this section also be strengthened to include specific measures that should be taken to remediate SSOs.

2.3.6 Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management)

We believe the one acre threshold is too large, especially in urbanized areas where most redevelopment projects are smaller than 1 acre. We urge EPA to adopt a 0.5 acre threshold which is more appropriate to achieve the program goals. At an absolute minimum, EPA should modify Part 2.3.6.a. to make it clear that permittees can regulate new development or redevelopment projects less than one acre. Perhaps this was EPA's intent in the phrase "at a minimum" at the end of the first sentence of 2.3.6.a., however, we think this could and should be stated more clearly especially given the language in Part 2.3.6.a.i. which provides that the permittee's program must include projects less than one acre if part of a larger common plan of development or redevelopment which disturbs one or more acre since permittees may believe that this is the only situation in which they are authorized to go below the one acre threshold.

We strongly support the requirement for an ordinance "at least as stringent as" retention of 1.0 inch of runoff from all impervious surfaces on the site. The 1.0 inch onsite retention standard is already required by Boston Water and Sewer Commission, the Town of Franklin, and other municipalities, and by all reports has been working well. While we have heard that some commentators would like EPA to limit the application of this requirement to only that portion of the site which is actually "redeveloped," or altered, this would be a departure from the definition of redevelopment under Massachusetts Stormwater Standards[9] and common understanding and application by municipalities of the applicability of the retention requirement to the entire property.

Most importantly, redevelopment provides the opportunity to redesign stormwater on the entire site, and is absolutely critical to an MS4's effective stormwater management since much of the development in the urban and suburban areas is in fact redevelopment. One inch retention site wide is also essential to enabling MS4s to meet the phosphorus reduction requirements in the two Charles watershed nutrient TMDLs. Lastly, application to all impervious surfaces on the site is quite important as communities grapple with extreme storm events and flooding impacts in the face of climate change.

In Part 2.3.6.a.ii.(a) permittees should not be given a choice between retaining on site the first inch of runoff from all impervious surfaces (2.3.6.a.ii.(a)1.) or providing the level of pollutant removal equal or greater than the level of removal provided through the use of biofiltration on the first inch of runoff from all impervious surfaces (2.3.6.a.ii.(a)2.). Parts 2.3.6.a.ii.(a)1. and 2. do not provide the same level of

[9] See, *Massachusetts Stormwater Handbook*, Volume I, ch. 1, p. 20-21 (Standard 7, redevelopment definition).

protection/benefit. Instead, 1.0 inch retention should be required where technically feasible. We recommend that the word "either" in (2.3.6.a.ii.(a) be stricken and the words "where not technically feasible" added after "OR" at the end of Part 2.3.6.a.ii.(a)1.[10]

CRWA also believes that the permit should allow for offsite compliance options in MS4s subject to nutrient TMDLs when compliance with Part 2.3.6.a.ii.(a)1. is not technically feasible. CRWA believes that off-site TMDL compliance is legally required when full onsite compliance is not feasible due to high groundwater, poor soils, the lack of available space or existing utilities, or other site constraints. Projects should have the option to either perform BMPs offsite, or to participate in an EPA-approved phosphorus reduction trading program, purchasing phosphorus reduction credits to partially meet their onsite stormwater management obligations. [11]

We believe that a trading program is a useful tool[12] that would provide an alternative stormwater management option for developers and property owners subject to regulation by MS4s. Trading would facilitate permit compliance and the achievement of nutrient TMDL limits,[13] reduce the costs of compliance, foster efficiency in meeting water quality standards at lower cost, and create incentives for voluntary reductions. *Water Quality Trading Policy* (EPA 2003). As EPA recognizes, "[m]arket-based approaches can also create economic incentives for innovation, emerging technology, voluntary pollution reductions and greater efficiency in improving the quality of the nation's waters." *Id*.

Trading could also provide incentives to promote stormwater infiltration across broader geographic areas helping to further reduce total stormwater loads while beginning to replicate more natural groundwater hydrology. We encourage EPA to modify the draft permit to authorize offsite mitigation and trading for nutrient TMDL compliance and to include this in the accompanying Fact Sheet. We suggest that a subsection 3. be added to Part 2.3.6.a.ii.(a) authorizing offsite mitigation and participation in an EPA-approved trading program when full nutrient TMDL compliance cannot be achieved on site.

The rules for trading will need to be established by the regulators and there are a number of options for how to structure and implement the trading program. However, the permit should authorize trading in the first instance. While EPA should take the lead in establishing basic trading parameters, we think MassDEP could and should play a key role in nutrient reduction trading program implementation.

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[10] We note that although EPA explains in the Fact Sheet at p. 89 that developers can meet the retention/treatment standard by either retaining the first inch of runoff from all impervious site areas or by "retaining on site the maximum amount of runoff feasible and providing treatment of the remainder of the runoff that cannot be retained on site due to site constraints," we do not believe this is what Part 2.3.6.a.ii.(a)2 actually says.

[11] Onsite TMDL compliance to the extent feasible should still be required before the purchase of stormwater reduction credits could be used to fully satisfy the onsite requirements. Sites able to go beyond compliance, or unregulated properties, could generate stormwater reduction credits for purchase by those properties unable to meet onsite requirements.

[12] CRWA's Blue Cities Exchange (BCE) is an online program developed for three upper watershed towns that enables regulated entities to log on, identify cost-effective BMPs using the EPA BMP phosphorus removal curves and cost estimates developed by CRWA staff based on experience installing BMPs and with input and peer review by consulting engineers. Once trading rules are established BCE would facilitate trades.

BMPs that promote infiltration should not be prohibited at every industrial site or site with documented soil contamination. Infiltration BMPs may be appropriate on a portion of an industrial site or with some types of soil contamination. We suggest that EPA qualify Part 2.3.6.ii(b) by adding the words "unless appropriate," or something similar. The phrase "documented soil contamination" seems both vague and overly broad and we think EPA could be more specific.

2.3.7 Good Housekeeping and Pollution Prevention for Permitee-Owned Operations

2.3.7.a.ii.(a) should include an evaluation of areas where there is existing or potential erosion, and the development of a remediation plan. Soil erosion is significant in many parks and open spaces, and often represents a highly effective and inexpensive opportunity for municipalities to reduce stormwater pollution, and phosphorus loading in particular.

2.3.7.1.a.3.(c): Once a year street sweeping operations are entirely inadequate. An absolute minimum of twice per year sweeping should be required for good housekeeping. We agree municipalities should prioritize areas of town where more frequent street sweeping is needed.

In conclusion, CRWA strongly supports the draft permit overall, and we encourage EPA to move forward expeditiously to finalize and effectuate this permit. Please do not hesitate to contact me should you have questions.

Sincerely,

Margaret Van Deusen

Margaret Van Deusen
Deputy Director and General Counsel

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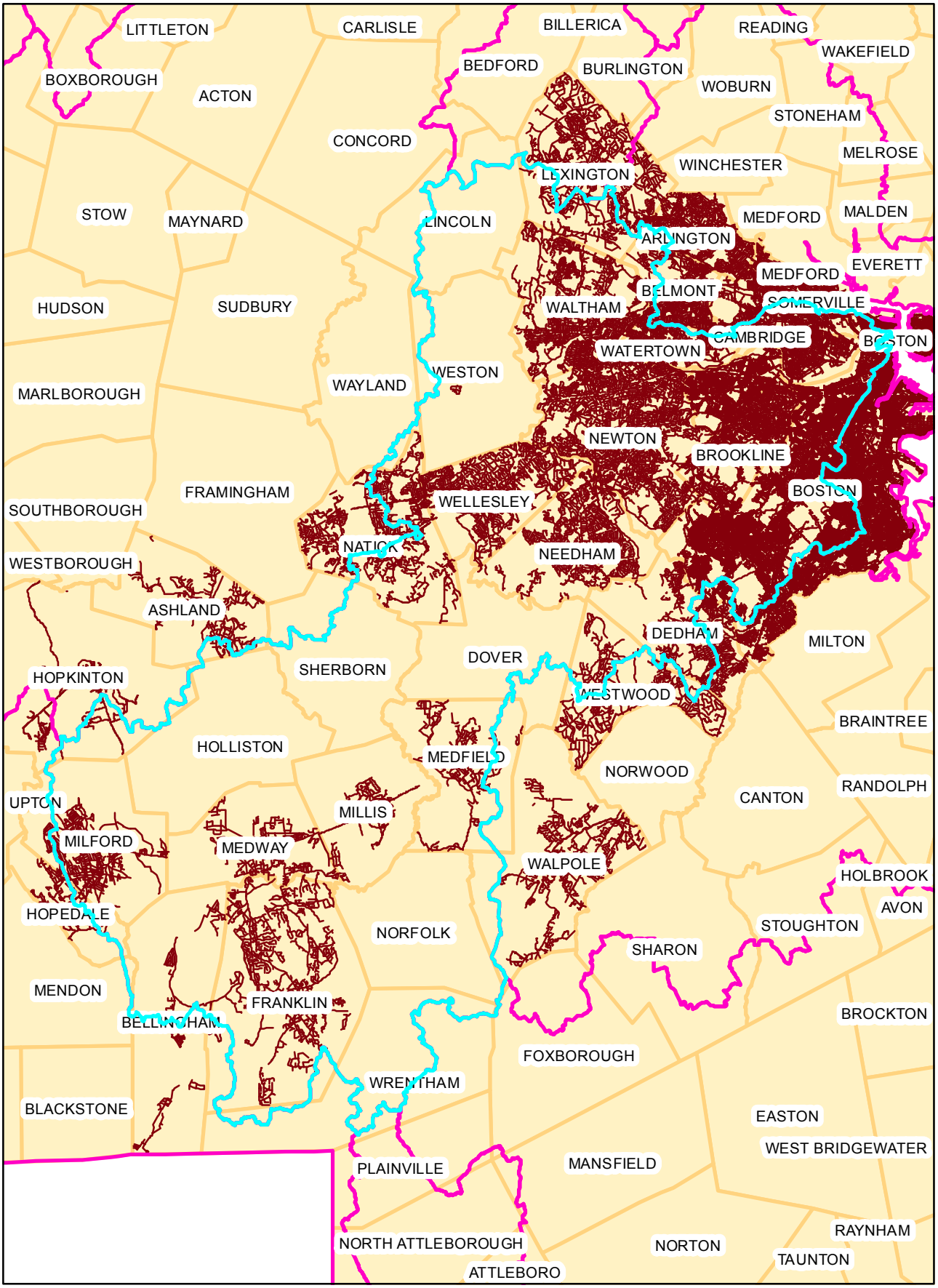

SEWAGE INFRASTRUCTURE IN THE CHARLES RIVER WATERSHED