



July 3, 2013

Kate Pelletier  
Planning Assistant

Joel C. Moulton  
Public Works Director

1333 State Road      Eliot, Maine 03903

Dear Kate and Joel,

The Department has reviewed the Town of Eliot's MS4 annual reports and on June 4, 2013, evaluated record keeping and conducted an on-site municipal MS4 program Audit. Your General Permit number is MER041004. Most of the field investigation/ground verification was conducted by Industrial Stormwater Inspectors, Alison Moody and Aaron Dumont with assistance from the Town's agent, Kristie Rabasca, as outlined in Appendix A and B of this document. Comments on the Town's compliance with Maine's MS4 Program are as follows.

DEP finds that Eliot has substantially complied with the MS4 General Permit requirements. Municipal staff was able to efficiently locate all outfalls within the Urbanized Area as per its storm sewer infrastructure map and produce supporting documents and documentation. Please be aware that Department staff did find some deficiencies that require corrective actions. Unless otherwise noted, these deficiencies must be corrected within 30 days of receiving this letter. An extension request for additional time to correct deficiencies must be presented to the Department in writing.

Another deficiency that was noted during the audit was an apparent lack of knowledge that the Code Enforcement Office has for Eliot's Municipal Stormwater Program. The CEO was unaware of the UA boundary and program requirements as per the MS4 GP. Your municipal departments need better coordination in implementing the Town's MS4 program. The 2013 MS4 General Permit requires municipal education; this appears to be needed in Eliot.

The purpose of the audit was to help the Town identify stormwater program areas that need attention so the program may be implemented more efficiently. I look forward to the Town's future efforts to address the upcoming challenges to reduce polluted stormwater runoff from entering Maine's surface waters. Please keep up the good work and if you have any questions do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Ladd". The signature is written in a cursive, flowing style.

David H. Ladd  
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Cc: File MER041004

## Appendix 1

### **Town of Eliot MS-4 Audit** **Field Notes from Operation and Maintenance Procedures Inspections** **Date: 06/04/2013**

#### **Town Hall**

**Facility Location:** 1333 State Road

**Date of Last Evaluation:** June 10, 2010

**Evaluators:** Aaron Dumont, Kristy Rabasca

**Municipal Facility Contact:** Kate Pelletier, Planning Assistant

There were only two notable issues with respect to this facility. The 275 heating oil AST should have the vent pipe taller than the fill pipe. The spill kit should be kept in an areas where it visible. At the time of the Department's inspection the spill kit was hidden behind some boxes.

#### **Fire Station**

**Facility Location:** 27 Dixon Road

**Date of Last Evaluation:** June 10, 2010

**Evaluator:** Aaron Dumont, Kristy Rabasca

**Municipal Facility Contact:** Jay Muzzeroll

This facility is located down the road from the Town Hall. It is located adjacent to the Police Station and the Dixon Road Recreation Area. A majority of the stormwater runoff from the back side of the site head to the skating pond for the Dixon Road Recreation Area. Water from the Backside of the Fire Station is either dissipated by vegetation or ends up in a vegetated swale that ultimately discharges to a forested/shrub scrub wetland with an unnamed stream that meanders through it. Vehicle washing takes place at both the Fire and Police Stations. Department Staff have photos of evidence of concentrated flow making it to the vegetated swale that discharges to the unnamed wetland.

Issues at the Fire Station were minimal. Department staff found a floor drain that is supposed to be plugged. Chief Muzzeroll was going to investigate the drain to make sure it was plugged. The two ASTs located in the basement of the facility were replaced in 1995. The facility contact was unaware of any integrity testing ever being performed in the years following installation. The facility Jay Muzzeroll is going to put a spill kit in the basement of the fire station.

There are two sections to the Fire Station located at 27 Dixon Road; the original Fire Station has floor drains on the upper level that drain to the Municipal Storm Sewer System. There was a corresponding floor drain for every garage door. The floor drains are located under the middle of every fire truck. The Fire Station addition has floor drains that drain to an oil/water separator. It was determined that that last time that the oil/water separator was maintained was two years ago. This is not adequate maintenance

for this device. The ultimate disposition of water run through the Fire Stations Oil/Water separator is presumed to the septic leach field.

The facility contact informed Department Staff that the first time he has seen the MS-4 O&M plan was a day before the MS-4 audit was scheduled. As a side note, there appeared to be a pile of burned material in close proximity to the vegetated swale that discharges to the unnamed forested shrub scrub wetland. Department Staff also question if the address is correct for the facility on the O&M as it appears to be the same as the Police Station.

#### **Police Station**

**Facility Location:** 27 Dixon Road

**Date of Last Evaluation:** June 10, 2010

**Evaluator:** Aaron Dumont, Kristy Rabasca

**Municipal Facility Contact:** Chief Ted Short (Present: Lt. Brown)

This facility is located down the road from the Fire Station. It is located adjacent to the Dixon Road Recreation Area. The stormwater runoff from the back side of the site flows towards the skating pond for the Dixon Road Recreation Area. It is then intercepted by a vegetated swale that directs flow to a forested/shrub scrub wetland with an unnamed stream that meanders through it. Department staff referred the town's consultant to criteria established in DWQM BMPs related to building and vehicle washing.

Department Staff notice a floor drain in the boiler room which also housed a 275 gallon AST for Number 2 heating oil. This floor drain was not noted on the O&M for the facility.

#### **Dixon Road Recreation Area**

**Facility Location:** Dixon Road

**Date of Last Evaluation:** June 10, 2010

**Evaluator:** Aaron Dumont, Kristy Rabasca

**Municipal Facility Contact:** Heather Muzzeroll-Roy, Community Services Director

Department staff observed a container that appeared to once be anti-freeze filled with water. There were numerous contains and materials stored at this site in a locked storage shed. Department Staff recommend evaluating the materials stored in this shed. The floor of this structure appeared to be compromised and is not adequate for containing a fluid leak.

Additionally there were three containers of bark mulch filled with water. The Department recommends draining these in an area with adequate vegetation and buffer to capture and absorb materials that are in suspension.

#### **Frost Tufts Park**

**Facility Location:** 195 Old Road

**Date of Last Evaluation:** June 10, 2010

**Evaluator:** Aaron Dumont, Kristy Rabasca

**Municipal Facility Contact:** Heather Muzzeroll-Roy, Community Services Director

There are not issues at this facility. The Department recommends that any contractors who perform seeding, fertilizing, or other athletic field maintenance be made aware of the catch basin in the field.

General comment for Facility SOPs; a general SOP was developed as part of the MS4 requirements however many facilities do not have a copy of this document on site. Please ensure that each facility has a list of potential pollutants on site as well as BMPs and maintenance schedules.

## Appendix 2

### **Eliot MS4 Outfall Evaluation By DEP Staff Alison Moody**

A stormwater outfall evaluation was conducted on June 4, 2013 as part of an MS4 Audit to determine permit compliance. The evaluation consisted of an inspection of all MS4 stormwater outfalls the municipality owns and maintains. A total of 29 outfalls were inspected during this evaluation and no stormwater discharge issues were identified. Items which should be addressed are outlined below.

- Although many of the stormwater outfalls were uniquely identified on the ground, this was not the case for all stormwater outfalls.
- At the time of evaluation a 2009 stormwater outfall list was included in the outfall binder which is now out of date due to recent updates conducted by the town. The new outfall lists should be included.
- At the time of evaluation, the stormwater outfall locations on the maps kept within the outfall binder were difficult to decipher at times. These maps should be replaced with the new updated map the town recently developed.
- The town recently removed DOT and private stormwater outfalls from the MS4 stormwater outfall list. A written agreement between the town and DOT regarding inspections and maintenance of stormwater drainage system and outfalls should be re-evaluated and documented.
- Stormwater outfall SW-009 identified on the outfall map was not located. As noted in recent town inspection records, this outfall was located and inspected in the early spring. This outfall most likely was not found during this evaluation due to over growth of vegetation along the steep embankment.
- The stormwater outfall map identifying SW-075 should be re-evaluated. On the ground evaluation of this area does not match the drainage information currently marked on the map. Outfall SW-075 was not located at the point marked on the map at the time of evaluation.
- Stormwater outfall located at 19 Spinney Creek Road was not properly identified on the outfall map.
- Stormwater outfall SW-002 & SW-003 should be properly maintained. New Rip Rap has been laid to stabilize the area but the culvert maintenance must be addressed. I understand this is currently on the town's maintenance schedule.
- Stormwater outfall SW-069 should be properly maintained. Currently the stormwater outfall is buried. The town is currently working on fixing this issue.
- Stormwater outfall SW-060, the pipe should be maintained. The town currently has this outfall listed as "failed" on their reports.