

Mr. David Ladd via email david.ladd@maine.gov
Municipal & Industrial Stormwater coordinator
Maine DEP, 17 State House Station
Augusta, ME 04333

Date

Subject: Response to Maine DEP comments on Eliot, Maine Permit Year 2 Annual Report for the Municipal Separate Storm Sewer System (MS4) Program

Dear Mr. Ladd:

Thank you for your January 25, 2016 comments on the Permit Year 2 (July 1, 2014 to June 30, 2015) Annual Report for the Town of Eliot, Maine.

This letter provides responses to the questions and requests in the comment letter. Your comments are reproduced in italics and bold, and the Town's responses are in normal text prefaced by, "Response:". Where required for clarity of our response, we have repeated the description of the "CONDITION FOUND" provided in your letter.

Minimum Control Measure 2 Public Participation

Request 2A: On the "Environmental Information and Tips" page or somewhere else that is logical, post links to the current SWPMP and annual reports.

Response: The 2013-2018 SWPMP and annual reports for Permit Years 1 and 2 have been added to the "Environmental Tips & Information Links page and can be accessed through the following URL:
http://www.eliotmaine.org/index.asp?SEC=1DB3BBCF-44DF-4B4B-AD92-4FA16FC951BA&Type=B_BASIC

Question 2B: Were any materials distributed to participants of the HHW Collection Day that emphasized the connection to pollution prevention or water quality protection?

Response: No materials were distributed to participants that emphasized the connection to water quality protection this year. The Town changed its HHW Collection Day vendor and inadvertently the advertisement for the event did not include the connection to water quality protection. However beginning in September, 2015, the Town updated the announcement and now the website and announcements state: "Never dump these chemicals down the storm drain, your sink or toilet". As part of the change to the new vendor, the Town is offering this event quarterly.

Minimum Control Measure 3. Illicit Discharge Detection and Elimination

Page 4 no DEP Question number: Septic Systems 20 years old or older – has the Town identified which septic systems will require an inspection?

Response: The Town is not required to have a list of septic systems until June 30, 2016. The Town has hired an intern to review the septic system information available on the parcels in the urbanized area. There are over 1,700 parcels in the urbanized area and approximately 600 of those are on sanitary sewer discharging to the Kittery Wastewater Treatment Plant. The map and lot files for the remaining 1,100 parcels are being reviewed for septic system permits. The list will be finalized by June 30, 2016.

Question 3A: The Town continued its outfall inspections during PY2 with additional investigations and testing of the Riverview area. When is the additional testing and CC TV work scheduled for outfall 001 in the Riverview area?

Response: Televising of approximately 450 feet of sanitary sewer was completed in May 2015 in the Riverview area, and a crack was observed in the sanitary line near CB-15. Additional televising of the remainder of the sanitary system and the storm drain system (which totals ~6,800 feet) is anticipated to be completed in April 2016. Because of the cost of the televising, the Town was required to obtain three bids. The bids were received and the Selectmen will review the bids at their meeting on 3/24/2016. Repairs to the system and any further investigations resulting from the television will be conducted in cooperation with the Riverview Homeowner's Association which is responsible for the septic system and sanitary sewers and pump station that serve this area.

Question 3B: Has the Town mapped every pipe and discrete conveyance which enters its MS4 ditch system?

Response: No, the Town is only mapping that infrastructure which is the Town's responsibility. If the Town encounters obvious pipes or conveyances that enter the Town's ditch system, they will map the location as a stub into their system, but will not travel onto private property to map private conveyances or to understand the source of the private conveyance. If the Town observed a potential illicit discharge in a ditch, the Town would investigate any suspect private pipes or conveyances and if appropriate, would map them as stubs with notes as to the source of the discharge into the MS4.

Question 3C: Has the Town mapped all of its fire hydrants within the UA on its storm sewer infrastructure map?

Response: Yes, the hydrants are all mapped on the storm sewer infrastructure map. The map is available to the public from the GIS link on the www.eliotmaine.org home page under the Eliot Government tab.

Minimum Control Measure 4 Construction Runoff Control

Question 4A: Does the Town's building application have a "Check-off box" that an applicant was informed that construction activities that disturb one or more acres are subject to either Chapter 500 or the MCGP?

Response: The Building Permit Application does not have a check off box, but they do have a statement that sites disturbing one or more acres must comply with the Maine Construction General Permit, and the application requires disclosure of the total square footage of site disturbance. The Code Enforcement Officer reviews this information when making decisions about what inspections are required as part of the application.

In addition, the Town Planner provides applicants with a copy of the Maine Construction General Permit Application packet application whenever they identify that they will be disturbing one or more acres of land.

As a result of this review of the Building Permit, the following changes were made in February 2016: The notice was modified to say that the applicant might also need to comply with Chapter 500 and the list of inspections was revised to include a check box for sediment and erosion control inspections.

Question 4B: Were there any construction sites less than one acre during PY 2?

Response: Yes, there were several construction sites that were less than one acre of land.

Minimum Control Measure 5 Post Construction Runoff Control

Question 5A: The Town's report states that two sites had BMPs discharging to the MS4 with no maintenance issues reported. Are these the only two sites since the Town's ordinance was adopted?

Response: Yes, these are the only two sites since the Town's ordinance was adopted. All other construction that has either disturbed less than one acre of land or has been outside the Urbanized Area.

Minimum Control Measure 6 Pollution Prevention Good Housekeeping

Question 6A: Approximately how much grit/material was collected during the Town's street sweeping during PY 2?

Response: Street sweeping in Eliot is conducted by the Town of Kittery. When the sweeping was done, it was done in a route that included some Kittery streets. Based on the street sweeping log, approximately 9 loads (~72 cubic yards) of material were collected during Permit Year 2 from the routes that included Eliot streets.

Questions 6B: Does the Town have a beneficial reuse program for this material?

Response: The Town of Kittery deposits the sweepings at the transfer station and does not beneficially re-use this material.

Question 6C: How many catch basins were inspected and cleaned during PY2?

Response: The Town inspected all 134 catch basins and cleaned those that had any visual material.

Request 6A: In future reports, please include the approximate amount and what the Town does with catch basin and street sweeping material/grit.

Response: The Town will include these additional details in subsequent annual reports.

Question 6D: Was the Depot Road ditching maintenance or new ditching?

Response: The Depot Road ditching was maintenance.

Question 6E: How many catch basins were replaced and how many were repaired?

Response: The Town did not keep track of the number of basins that were replaced and repaired. The basins were repaired as needed based on inspections and citizen reports.

In closing, if you would like to receive copies of our inspection, maintenance or tracking spreadsheets or forms, please let either Kristie Rabasca, or me know. Thank you for your comments on the Town's Permit Year 2 Report. The Town is committed to doing all it can to fulfil the terms of the MS4 General Permit to keep Maine's waters fishable and swimmable.

Sincerely,

Town of Eliot

Kate Pelletier, Planning Assistant

Cc (via email):

Joel Moulton (Public Works Director)

Heather Ross (Code Enforcement Officer)

Dana Lee (Eliot Town Manager)

Kristie Rabasca (Integrated Environmental Engineering, Inc.)