US-EPA Discusses water quality status of Little River (Cambridge), Alewife Brook (mostly Somerville and East Arlington) and Little Pond (Belmont). Response to inquiry after publication of River Restore report from FAR Ecology Camp 2015.

Questions from FAR
Answers by US-EPA
August 15

From FAR:

Dear Mr. Borci,
(Administrator to the Administrative Consent Order of the US-EPA)

My small non-profit has been busy this summer in attempts to show specific findings related to the recent "D-" status given to Alewife sub-watershed by your agency. We would like information related to all of the outfalls which go into little Pond, Little River and Alewife Brook.

We understand US-EPA requires all municipalities to enforce a functioning federal standard (NPDES) and that you hold that information.

Please inform where we might see all outfalls, ownership of the outfalls, and plans related to their upgrade.The recent **Globe**article about the low federal status grade of this area has prompted others to be concerned as well.

Any information sent to me should additionally be sent to the Mystic River Watershed Association's water quality monitors.

Best,
Ellen Mass
President
Friends of Alewife Reservation

See US-EPA reply on next page

From Boston- US-EPA (Enforcement Division)

Thank you for your inquiry. I've attempted to provide a response to your questions below. Please feel free to call or email with any additional questions or clarifications. Your inquiry deals with two different divisions here at EPA, as permitting and enforcement are required to be separate. Since I am in the enforcement section, I will do my best to answer your questions, but will also provide a contact for the permitting division at the bottom of this message.

Most urban municipalities are required to comply with the Municipal Separate Storm Sewer System ("MS4") Phase II General Permit. The permit was last issued in 2003, and requires communities to complete a number of "minimum controls" regarding stormwater, and stormwater discharges, in the municipality. Each community must submit an annual report indicating whether they are in compliance with the permit. All of this information can be found on the EPA web site at the following link:

http://www.epa.gov/region1/npdes/stormwater/index.html

…and the specific reports from each community can be found at the following link:

http://www.epa.gov/region1/npdes/stormwater/2003-permit-archives.html

This permit is in the process of being re-issued, with much more detailed requirements for the permittees, such as enhanced mapping, as well as water quality sampling of most outfalls. The proposed permit and additional information can be found on the first link provided above.

That said, many communities have been found to be out of compliance with the current permit. EPA has coordinated with MassDEP to address many of the communities discharging to the Mystic River and Alewife Brook. Typically, "address" means issue some sort of enforcement order for a community to investigate and remediate sources of pollution to the town's stormwater system. Most often, these sources of pollution are old and leaking sewers, or direct sewer connections to the stormwater system. Collectively these sources are referred to as "illicit discharges", as the MS4 General Permit allows only "stormwater" to be discharged from the town's stormwater system (with a few very specific exceptions), and sewage and other pollutants are clearly not stormwater.

As you know, the Metropolitan Water Resources Authority ("MWRA") has been working to reduce combined sewer overflow ("CSO") discharges to Alewife Brook, as well as throughout the Boston Harbor watershed. As these major sources of sewage have been reduced or eliminated, this has allowed EPA and MassDEP to focus on the remaining illicit discharges. Most often this is done by following up on sampling conducted at each outfall by the Mystic River Watershed organization, MassDEP, or EPA. EPA has even developed a forensic-level pharmaceutical suite that tests water samples for compounds such as acetaminophen and caffeine, among a few others. This testing provides a high degree of certainty whether sewage is present in the discharge. Such sampling was conducted in Belmont, MA, and the results were provided to the Town in the form of a Notice of Violation, informing the Town they were discharging sewage mixed with stormwater in both Winn's Brook and Wellington Brook. EPA expects such Towns to remedy the situation, and if not done in a timely manner, we would look to additional enforcement tools. Often, the investigation of the source and ultimate remedy typically take some time, involve multiple levels of work proposals, bidding by contractors, and construction.

Now that the Alewife wetland and the Cambridge sewer separation work to reduce CSO discharges is nearing completion, EPA and MassDEP will continue to focus in on the remaining Alewife issues, with a focus on illicit discharges. In addition, the hope is the new MS4 permit will be issued within the next year, and the combined effect will be cleaner water in Boston Harbor, its tributaries, and throughout the MS4 communities.

As far as maps of outfalls, the current permit requires each community maintain such a map, but does not require the map to be submitted to EPA. The new permit requires the maps to be submitted and encourages communities to post the maps online. I have attached a few documents and provided a couple links below that provide some information on outfalls to the Alewife, Little Pond, and Little River.

http://www.cambridgema.gov/theworks/ourservices/stormwatermanagement/waterqualitysampling

http://www.somervillema.gov/departments/dpw/alewife

The best EPA contact for permitting questions is Thelma Murphy (murphy.thelma@epa.gov or 617-918-1615).

Please take a look at the information and let me know if you have additional questions. I can assure you EPA is concerned about water quality in the Alewife and will be doing as much as we can with existing resources.

Thank you again for your inquiry and I hope this was helpful.