

CITY OF CAMBRIDGE STORMWATER MANAGEMENT PROGRAM

EPA Small MS4 General Permit (Phase
II NPDES)

Health and Environmental Committee:
Public Hearing

September 27, 2018



AGENDA

- ▶ MS4 Program Overview
- ▶ What Cambridge has been doing
- ▶ Permit Requirements
- ▶ Changes in the new permit

GLOSSARY OF TERMS AND ABBREVIATIONS (PARTIAL)

BMP: Best Management Practices

CSO: Combined Sewer Overflow

IDDE: Illicit Discharge Detection and Elimination

MCM: Minimum Control Measure

MEP: Maximum Extent Practicable

MS4: Municipal Separate Storm Sewer System

NPDES: National Pollution Discharge Elimination System

PCP: Phosphorous Control Plan

Phase II: City's with populations <100,000 in 1999

Point Source: Any discernible, confined and discrete stormwater conveyance

SSO: Sanitary Sewer Overflow

SWMP: Stormwater Management Plan

TMDL: Total Maximum Daily Load

NPDES PROGRAM OVERVIEW

Clean Water Act



- ▶ The Federal Water Pollution Control Act of 1948 was the first major U.S. law to address water pollution.
- ▶ Growing public awareness and concern led to sweeping amendments in 1972, the law became commonly known as the Clean Water Act.
 - ▶ Established the basic structure for regulating pollutants discharges into the waters of the United States.
 - ▶ Made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. **Stormwater was not considered a point source discharge.**



Cuyahoga River, OH 1969



THE WORKS
CAMBRIDGE
DEPARTMENT
OF PUBLIC

NPDES:

National Pollutant Discharge Elimination System



Water Quality Act of 1987 regulated stormwater as a point source discharge

1990: Phase I

- ▶ Regulated stormwater discharges from Municipalities (over 100,000 population), industrial operations, construction sites (>5 acres)

1999: Phase II

- ▶ Regulates stormwater discharges from small Municipalities (260 municipalities in MA)
- ▶ Initial Notice of Intent submitted July 2003
- ▶ 2016 Reissued Permit Effective – July 1, 2018 - 2023

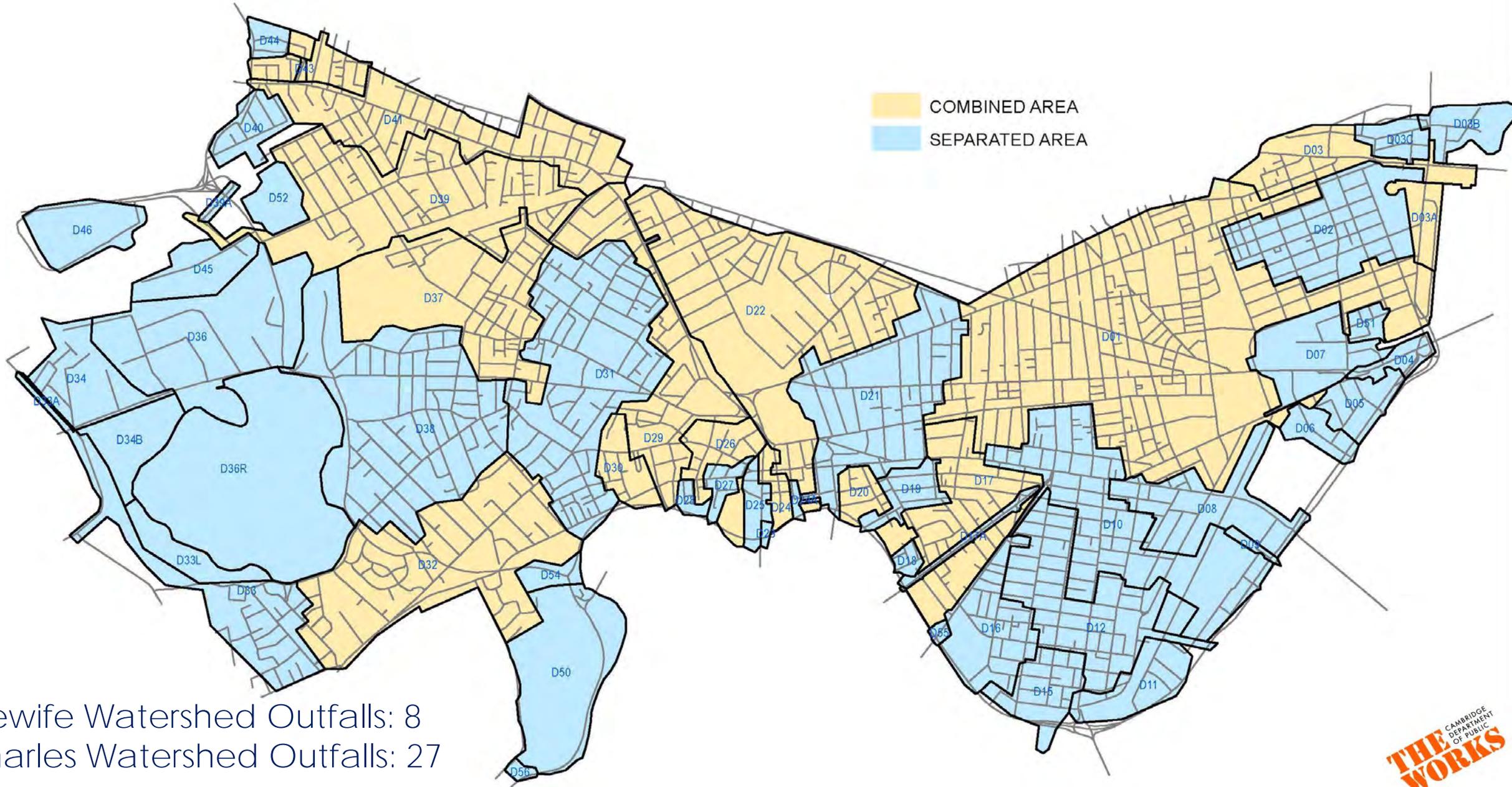
Why is Stormwater a Problem



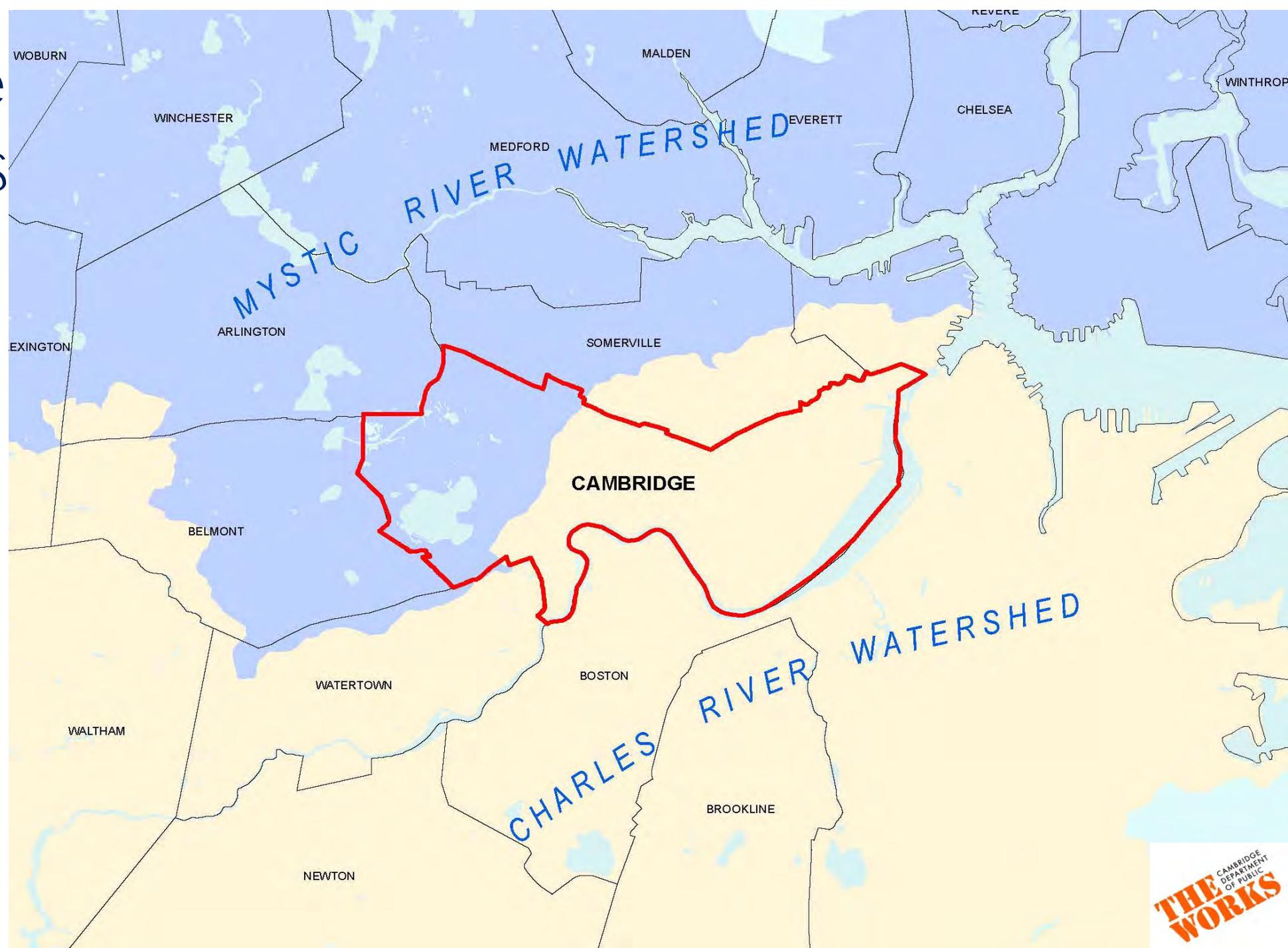
Source: EPA

WHAT DOES THIS MEAN FOR CAMBRIDGE?

Regulated Areas



Cambridge Watersheds

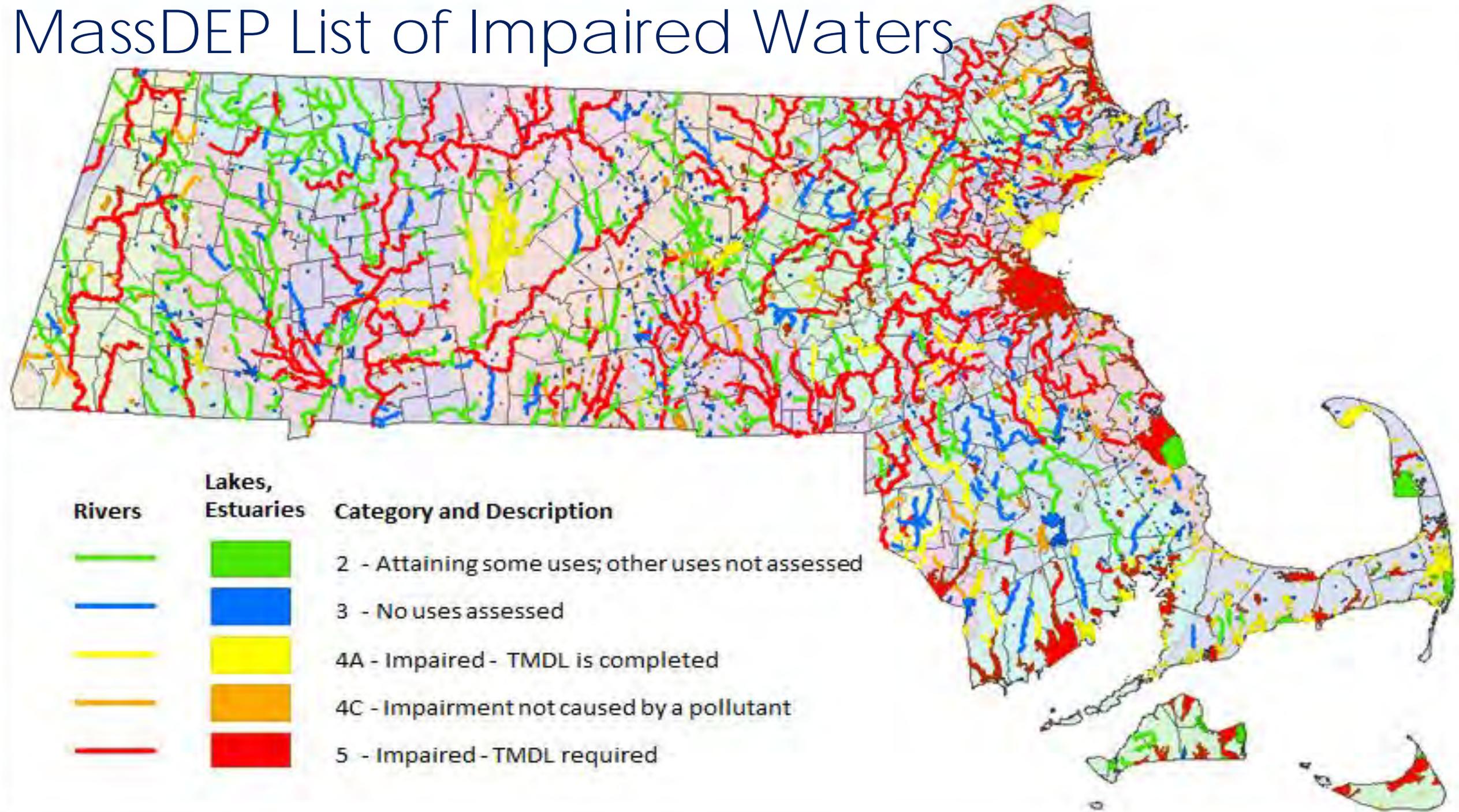


Impaired Waters

Stormwater discharges are causing or contributing to at least **55%** of the impairments in all Massachusetts' assessed waters

Source: EPA

MassDEP List of Impaired Waters



EPA - Charles River Initiative (1995)

Charles River Report Cards Based on State Bacterial Standards							
Year	Overall Grade	% Meets Standards		% Meets Standards in Dry Weather Conditions		% Meets Standards in Wet Weather Conditions	
		Boating	Swimming	Boating	Swimming	Boating	Swimming
2017	A-	95	72	96	89	95	64
2016	B	86	55	98	61	80	53
2015	B+	95	69	98	86	93	60
2014	B+	91	65	100	86	86	53
2013	A-	96	70	97	84	95	63
1998	C+	83	51	98	85	74	31
1997	C	70	34	87	56	61	22
1996	C-	57	21	94	40	45	15
1995	D	39	19				

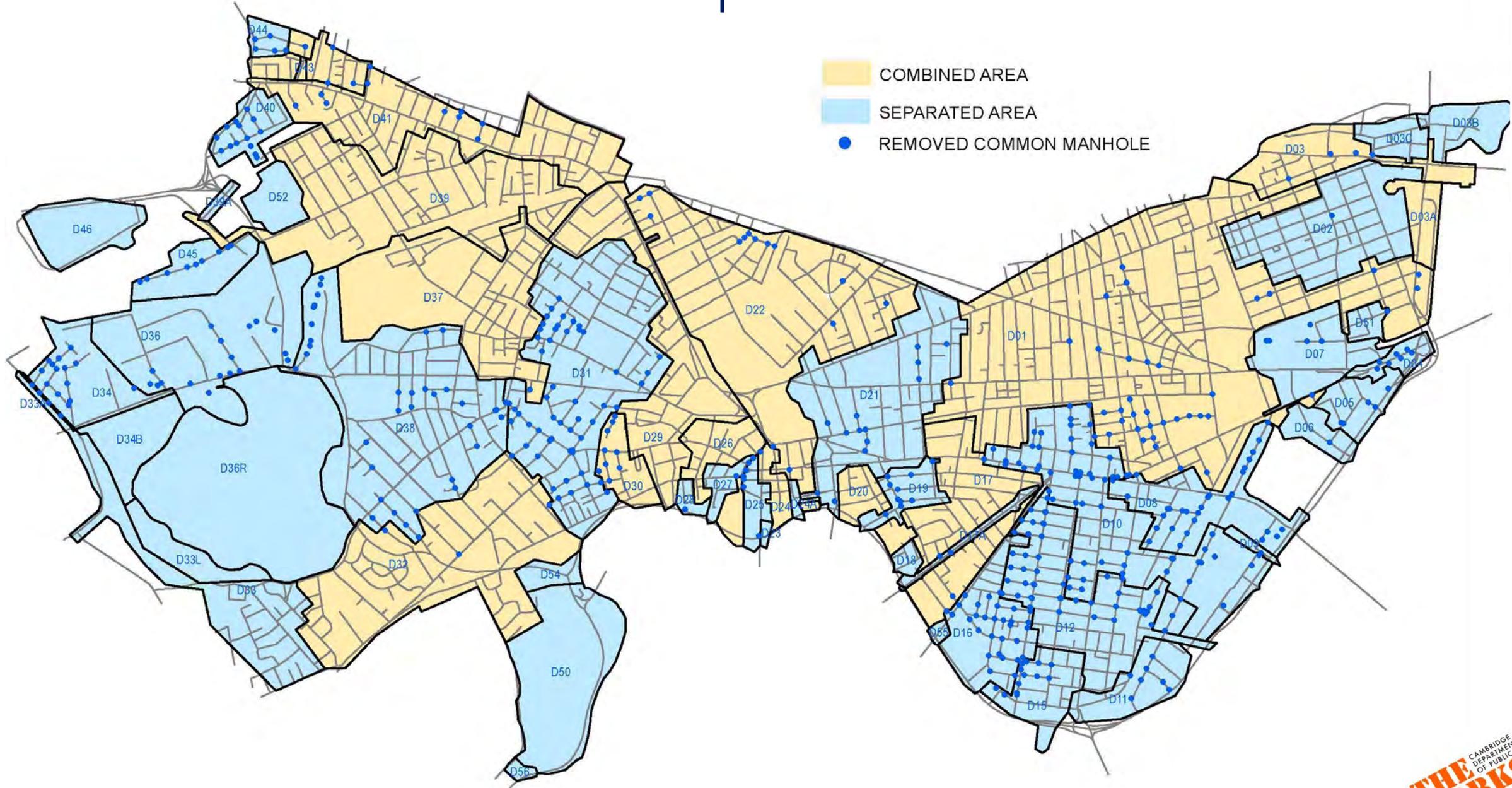
EPA – Mystic River Initiative (2008)

Mystic River Water Quality Grades & Compliance Rates for Freshwater Sites

	Little River		Alewife Brook		Mystic River (fresh)	
Year	Grade	Total	Grade	Total	Grade	Total
2017	D+	54.20%	D+	53.80%	A-	87.60%
2016	D	49.40%	D+	54.20%	A-	85.80%
2015	D-	44%	D	50%	A-	85%
2014	D-	40%	D	46%	B+	85%

WHAT HAS CAMBRIDGE BEEN DOING

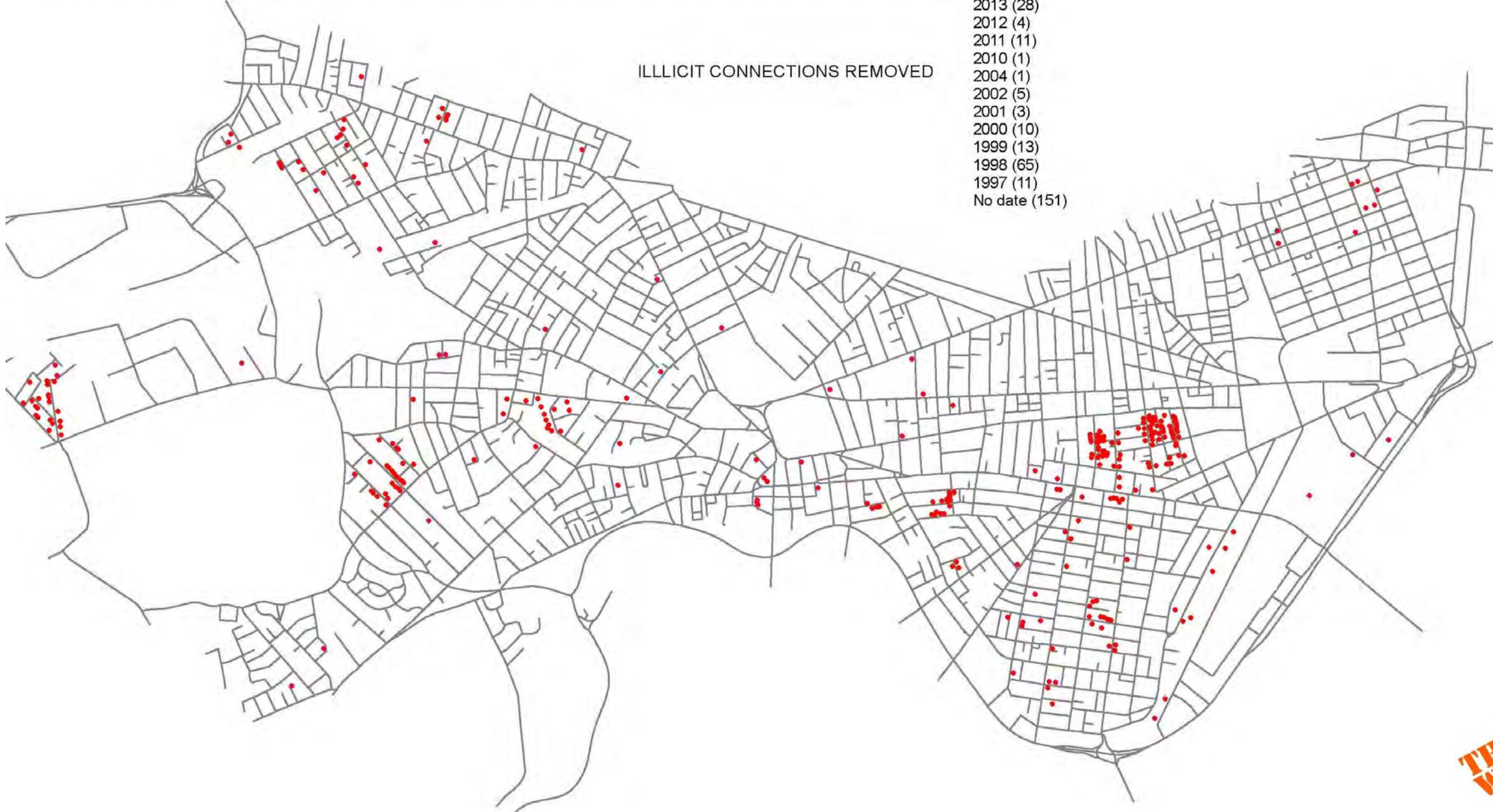
Common Manhole Separation



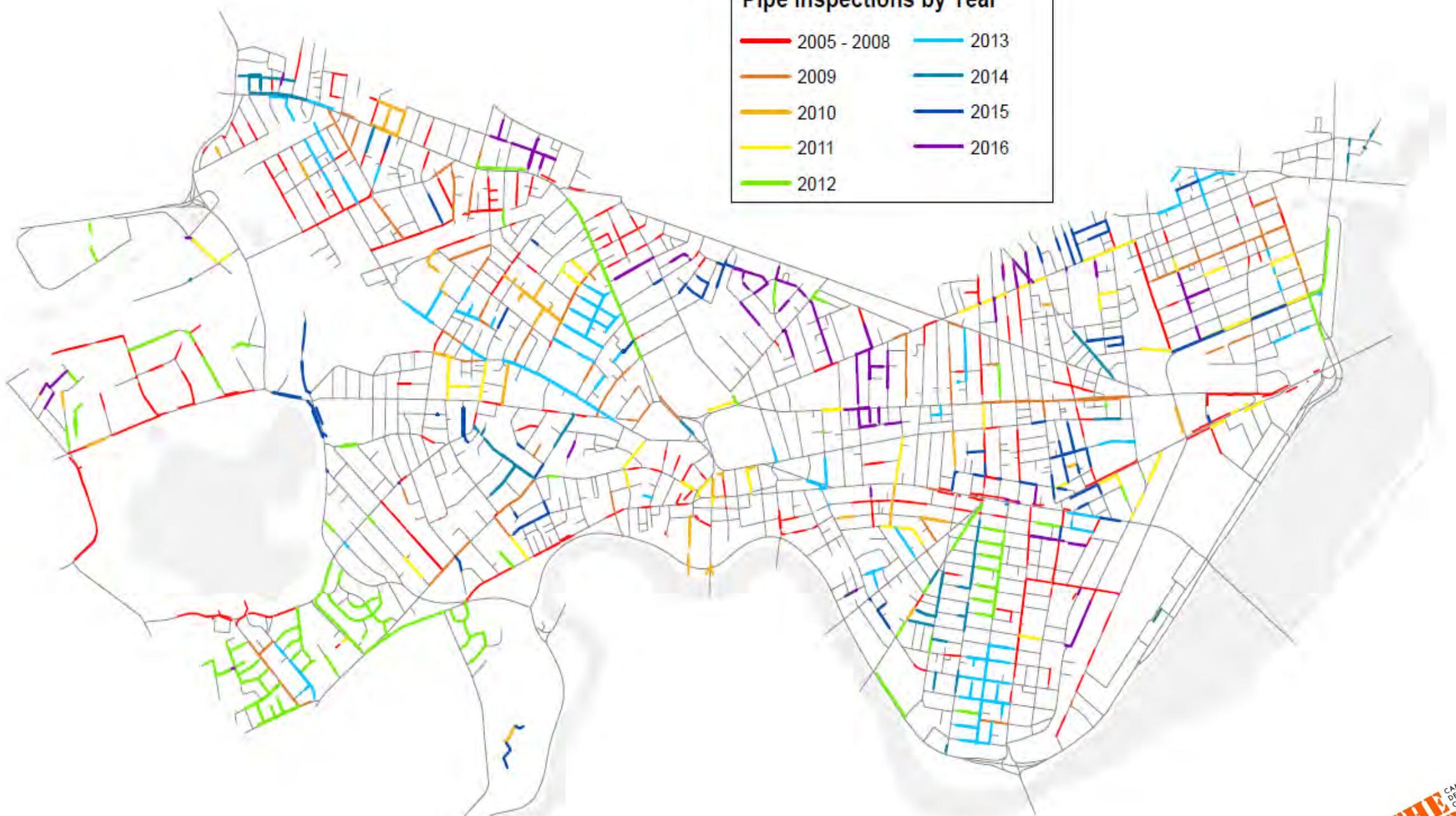
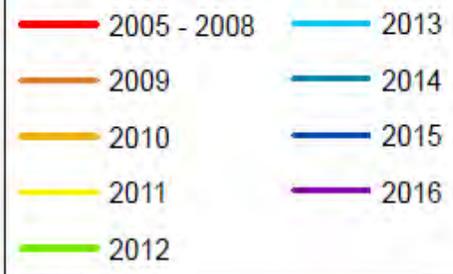
Illicit Connections Removed

ILLICIT CONNECTIONS REMOVED

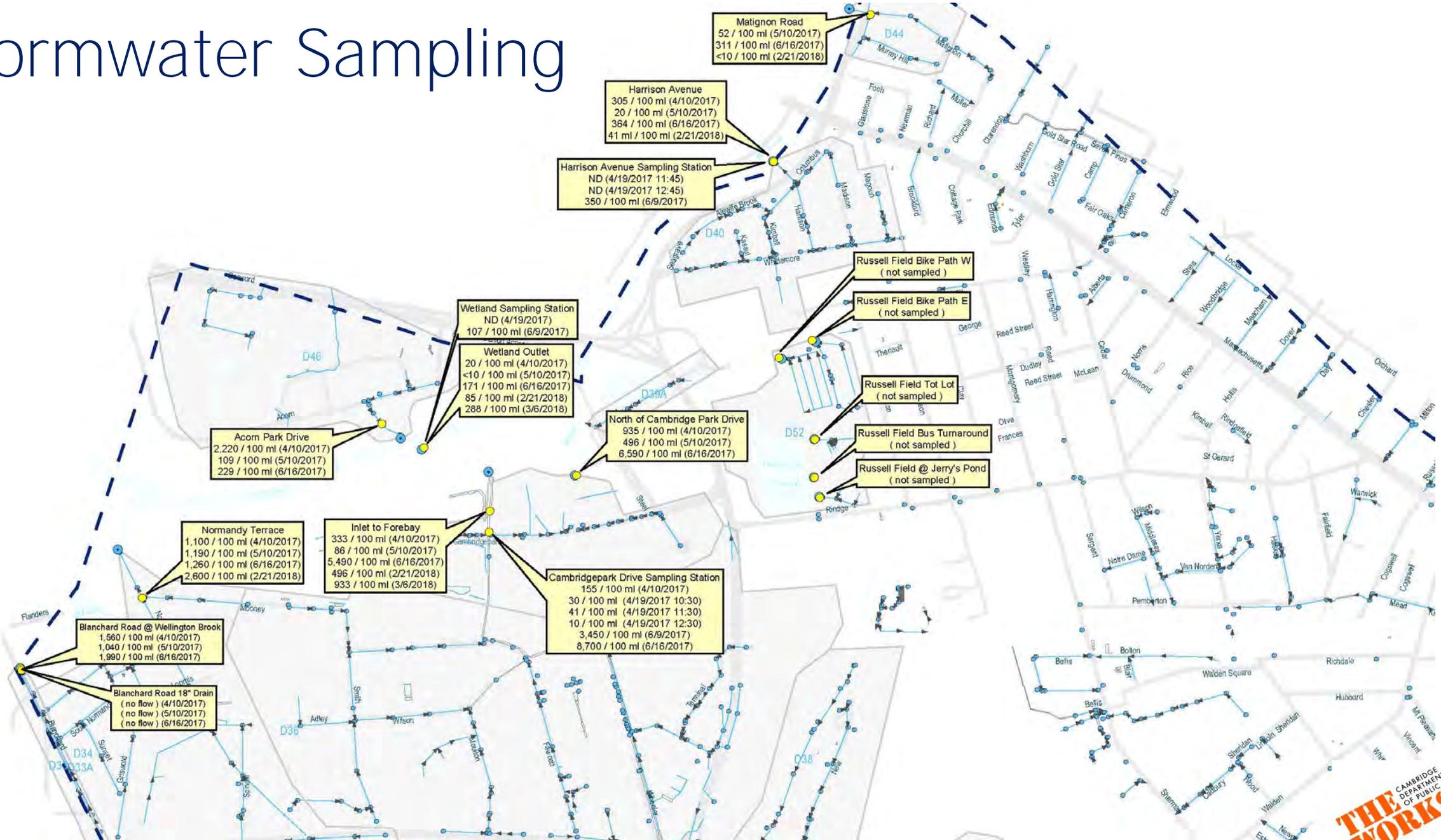
2016 (1)
2013 (28)
2012 (4)
2011 (11)
2010 (1)
2004 (1)
2002 (5)
2001 (3)
2000 (10)
1999 (13)
1998 (65)
1997 (11)
No date (151)



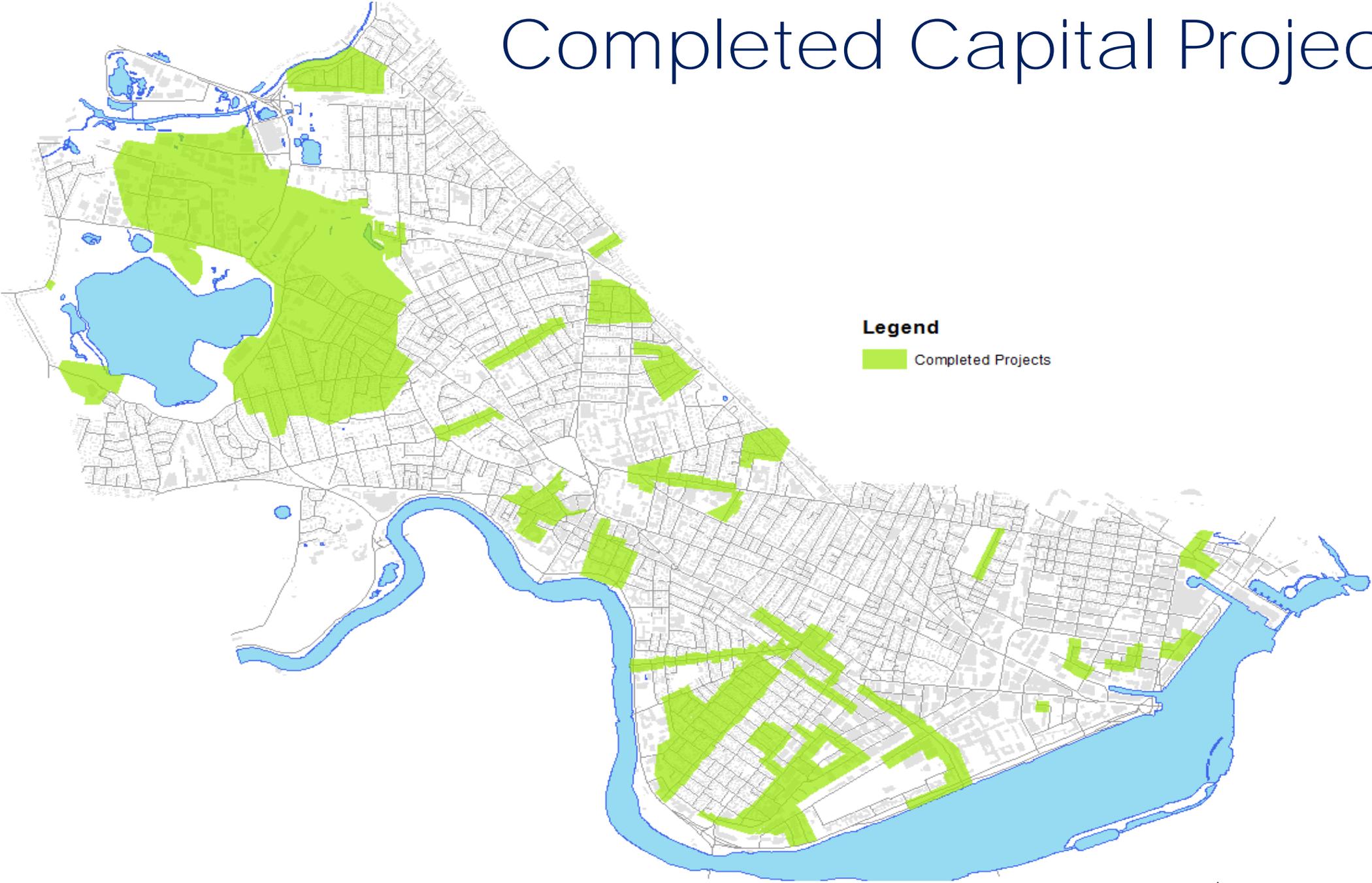
Pipe Inspections by Year



Stormwater Sampling



Completed Capital Projects



Alewife Reservation Stormwater Wetland Completed 2013

- 3.4-acre project serving 300+ acres
- The largest engineered wetland in the Eastern United States
- Designed allow sewer separation in West Cambridge, reducing Combined Sewer Overflows (CSOs) to the Little River
- Retains and treats separated stormwater in a constructed wetland before being discharged to the Little River and ultimately Alewife Brook, Mystic River, and Boston Harbor.



Stormwater Control Permits

- ▶ Regulates private development
 - Stormwater Management Plan
 - Erosion & Sediment Control Plan
 - Operations & Maintenance Plan

Reduce 80% TSS and 65% TP from site.

No increase in CSOs or SSOs

Peak development discharge rate less than existing conditions

WHAT ARE THE PERMIT REQUIREMENTS

PERMIT REQUIREMENTS

Address 6 Minimum Control Measures

- ▶ Public education/outreach
- ▶ Public involvement/participation
- ▶ Illicit discharge detection/elimination
- ▶ Construction Site stormwater runoff control
- ▶ Post-construction stormwater management
- ▶ Pollution prevention/good housekeeping for municipal operations

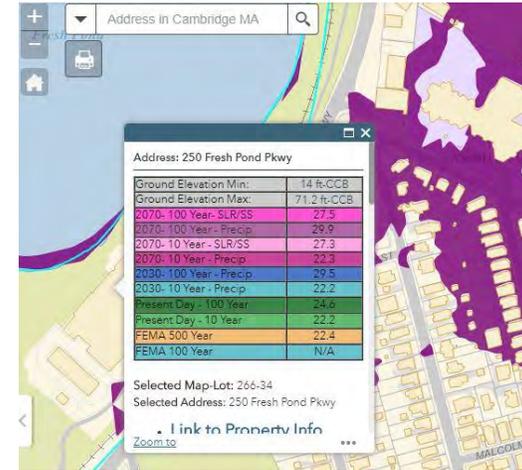


Develop and implement Best Management Practices to address each program area to the *MEP*

CURRENT ACTIVITIES

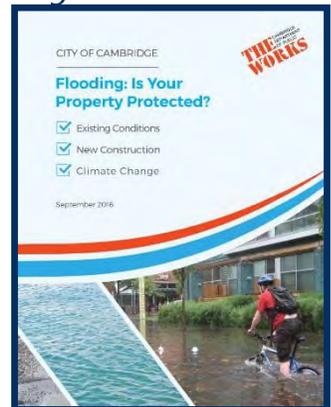
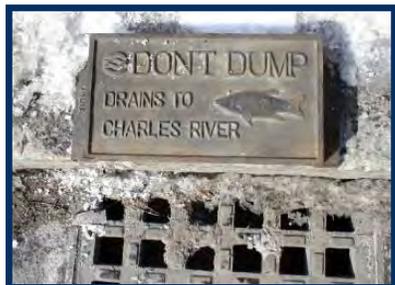
#1. PUBLIC EDUCATION & OUTREACH

- ▶ Meetings (formal and informal) on infrastructure projects
- ▶ Alewife Stormwater Wetland tours
- ▶ Provide information at Celebrations/Cookouts
- ▶ Maintain a Stormwater webpage, tweets, Facebook www.cambridgema.gov/stormwater
- ▶ Develop online tools Flood Viewer www.cambridgema.gov/Services/FloodMap
- ▶ Rain Barrel Promotion since 2003



#1. PUBLIC EDUCATION & OUTREACH (CONT.)

- ▶ Curb Marker installations
- ▶ Youth Outreach
 - Enviroscape demonstration
 - Cambridge Science Festival
 - Arbor Week activities
 - Alewife wetland tours
- ▶ Collaborating with other communities
 - MyRWA Stormwater Education Collaborative
 - Charles River Watershed Collaborative
- ▶ Provide Information in City Publications:
- ▶ Develop Brochures

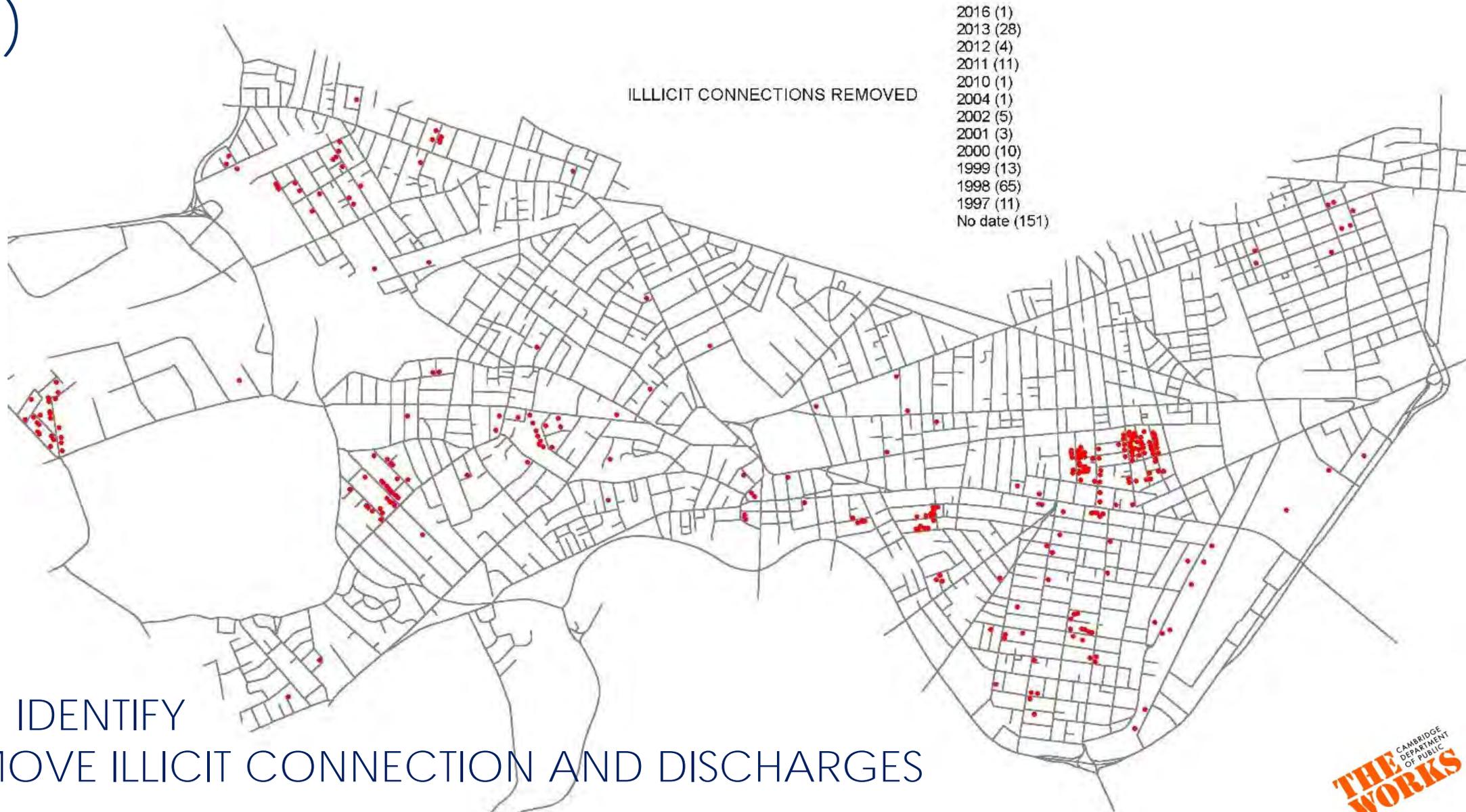


#2. PUBLIC PARTICIPATION & INVOLVEMENT

- ▶ Household Hazardous Waste Collections
- ▶ Annual Stormwater Meeting
- ▶ Envision Cambridge
- ▶ Climate Change Preparedness & Resiliency



#3. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)



PROHIBIT, IDENTIFY AND REMOVE ILLICIT CONNECTION AND DISCHARGES



IDDE PROGRAM

- ▶ Investigations
 - Water Quality Sampling (dry, wet, oil/grease)\
 - Inspections prior to construction – TV, die testing
 - Complaints (see, Click, Fix, email, phone calls)
- ▶ Illicit connection removal through Remedial and sewer separation contracts
- ▶ Automatic Sampling Stations (5)



#4. CONSTRUCTION SITE RUNOFF CONTROL

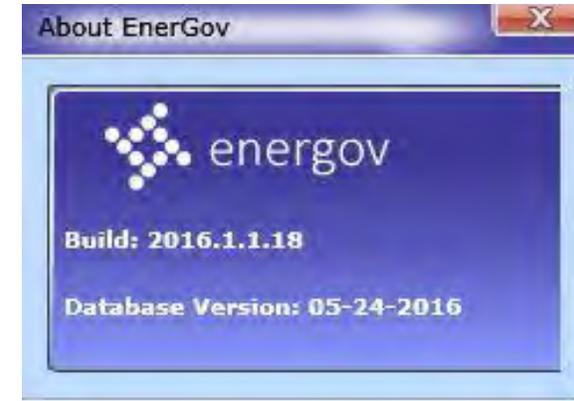
REDUCE POLLUTANTS FROM CONSTRUCTION SITES THAT DISTURB ≥ 1 ACRE AND SIGNIFICANT PROJECTS

- ▶ Inspect active construction sites
- ▶ Weekly meetings with large contractors during March – Nov
- ▶ Issue WARNING tickets for violations



#5. POST CONSTRUCTION STORMWATER MANAGEMENT

- ▶ Inspect BMPs Post Construction
- ▶ Maintain private BMP Database for private facilities
- ▶ Manage permitting, inspections and code enforcement through Energov software



BMP inspection



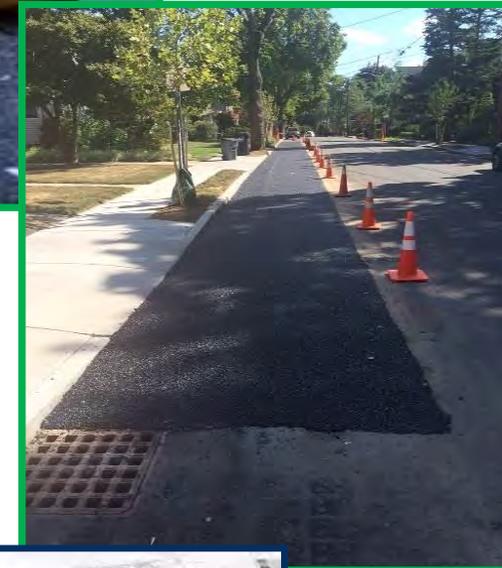
Filtration system



Infiltration swales

#6. POLLUTION PREVENTION & GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

- ▶ Street/Infrastructure Maintenance Practices
 - Street sweeping debris (1142 tons)
 - 6,000 catch basins. Annually clean 2,000 (300 tons)
 - TV & Cleaning, Remedial Construction, Pipe Lining
- ▶ Construction of Stormwater BMPs in projects
 - Porous Asphalt
 - Rain Gardens/Biobains
 - Infiltrating Catch Basins
 - Grit Chambers



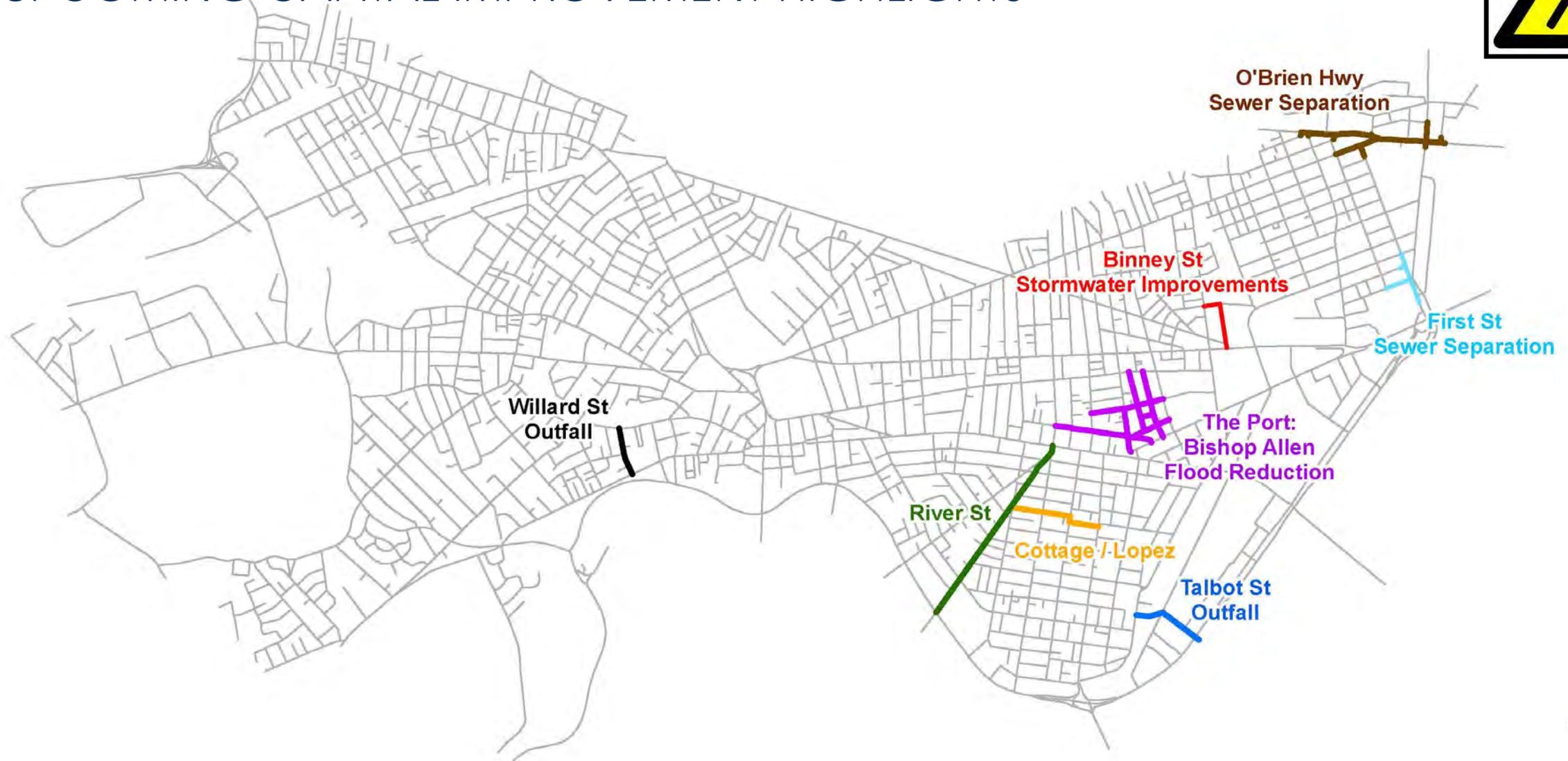
#6. POLLUTION PREVENTION & GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

- ▶ Tree Plantings, increase planting areas (Urban Forest Master Plan)
- ▶ Inspection of Municipal Facilities
- ▶ Employee Training
- ▶ Cartegraph for work order management



#6. POLLUTION PREVENTION & GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

UPCOMING CAPITAL IMPROVEMENT HIGHLIGHTS



NEW PERMIT REQUIREMENTS

Status of New NPDES MS4 Permit

- ▶ Effective Date: July 1, 2018
- ▶ Notice of Intent Due: October 1, 2018
- ▶ Stormwater Management Plan Due (SWMP): July 1, 2019
- ▶ <https://www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit>

What's New:
More prescriptive



CHANGES IN THE NEW PERMIT

Highlights

- ▶ Develop and implement programs to address TMDLs
 - Charles River: Bacteria/Pathogens
 - Charles River: Phosphorous (P)
 - ❖ Develop and implement Phosphorous Control Plan (PCP)

1-5 years after permit effective date	5-10 years after permit effective date	10-15 years after permit effective date	15-20 years after permit effective date
Create Phase 1 Plan	Implement Phase 1 Plan		
	Create Phase 2 Plan	Implement Phase 2 Plan	
		Create Phase 3 Plan	Implement Phase 3 Plan

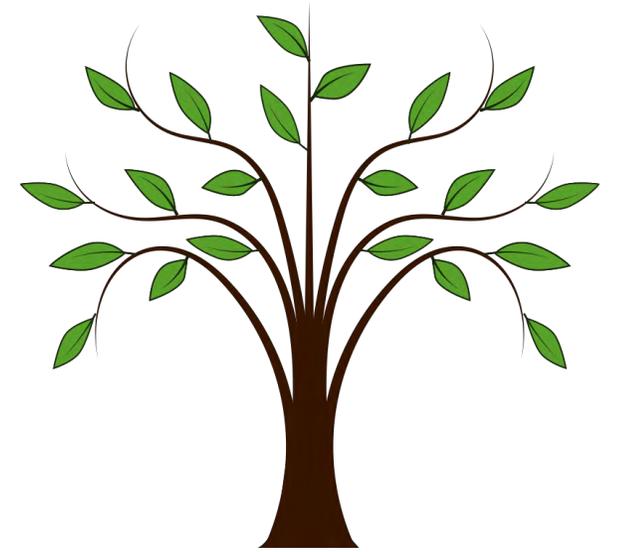
- ❖ Reduce P load by 51%

Why is Phosphorous a Problem?



Source of Phosphorous

- ▶ plant and leaf litter,
- ▶ soil particles,
- ▶ pet waste,
- ▶ road salt,
- ▶ fertilizer, and
- ▶ atmospheric deposition of particles.

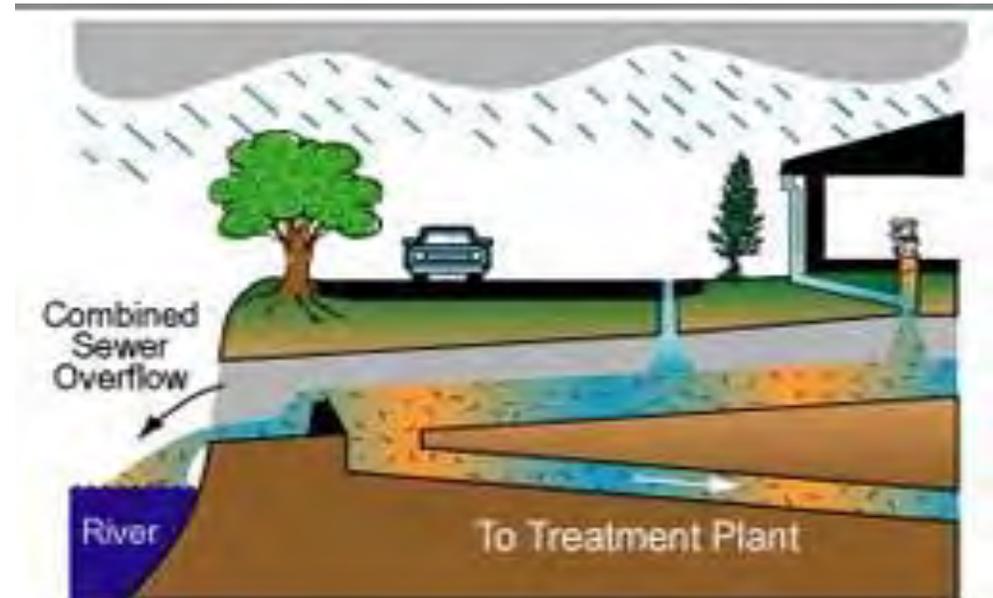
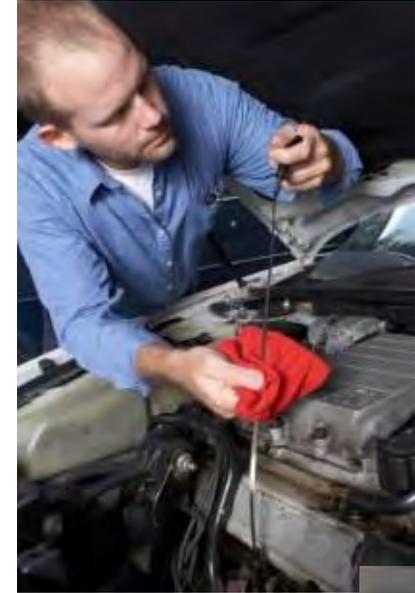


CHANGES IN THE NEW PERMIT

Highlights cont.

► Enhanced Program to address Water Quality Limited Waterbodies

- PHOSPHORUS
- METALS
- SOLIDS
- BACTERIA OR PATHOGENS
- OIL AND GREASE



WATER-QUALITY BASED REQUIREMENTS FOR IMPAIRED RECEIVING WATERS

- ▶ Alewife (Phosphorous, e. Coli)
 - Timed and targeted public outreach materials related to P control, pet waste management
 - P source identification plan (4 yrs)
 - Evaluate muni property for P retrofit opportunities (5 yrs) and install BMP (6 yrs)
 - Manage grass cuttings and leaf litter on Muni property
 - Require new development and redevelopment projects optimize P removal
- ▶ Alewife and Charles (oil & grease, solids, metals)
 - Containment of spills on private property
 - Increase street sweeping in high pollutant load areas



CHANGES IN THE NEW PERMIT CONT.

6 MINIMUM CONTROL MEASURES

1. Public education/outreach
 - ▶ Targeted messages
 - ▶ Timed messages
2. Public involvement/participation
 - ▶ No new changes
3. Illicit discharge detection/elimination (IDDE)
 - ▶ Increase dry and wet weather sampling
 - ▶ Update system catchment mapping
 - ▶ Document IDDE Program
 - ▶ Assess, Rank and investigate all Outfalls (7-10 yrs)



Think Blue Campaign



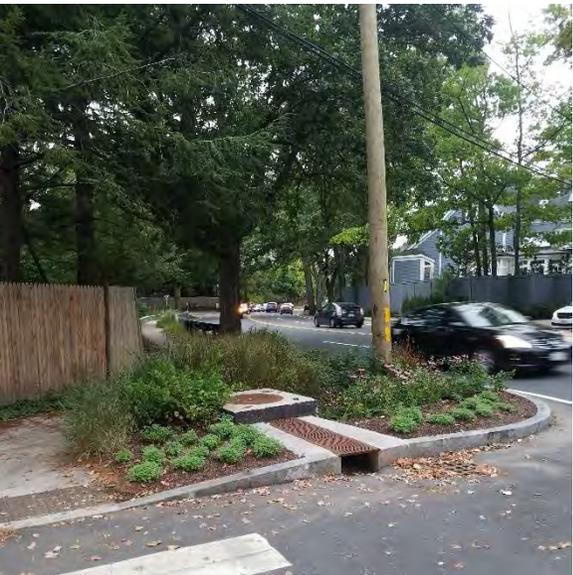
CHANGES IN THE NEW PERMIT CONT.

4. Construction Site stormwater runoff control

- ▶ No changes

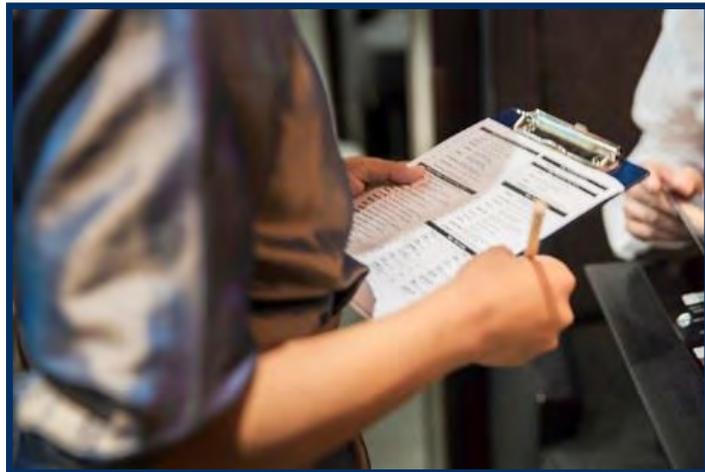
5. Post-construction stormwater management

- ▶ Encourage Low Impact Development strategies – public and private
- ▶ Assess regulations to remove barriers to implementing low impact designs for streets and parking lots.



CHANGES IN THE NEW PERMIT CONT.

6. Pollution prevention/good housekeeping for municipal operations
 - ▶ Catch Basin maintenance – 50% sump
 - ▶ Document road salt use optimization plan
 - ▶ Document annual inspections of stormwater treatment structures
 - ▶ Stormwater Pollution Prevention Plans (SWPPP)



COMMENTS/QUESTIONS



Cambridge DPW stormwater webpage:
www.cambridgema.gov/stormwater

EPA Massachusetts Small MS4 General Permit:
www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit