

**EPA-New England
January 8, 2008 Monitoring Meeting for
Small MS4 Permit Phase II Communities
Summary of Discussion**

EPA-New England held a meeting on January 8, 2008, to hear about the experiences and perspectives of Small Municipal Separate Storm Sewer System (MS4) Phase II communities regarding monitoring. We value the contributions of the participants and have summarized the major points here.

Please see also the list of attendees, links to other US communities with monitoring as part of their permits, and brief powerpoint presentation available at <http://www.epa.gov/region1/topics/water/stormwater.html>

The meeting opened with an introduction from David M. Webster, EPA-New England's Industrial Permits Branch Chief, followed by a welcome from Stephen Perkins, Director of the Office of Ecosystem Protection at EPA-New England. Mr. Perkins thanked everyone for coming and encouraged all attendees to relate their experiences and perspectives regarding monitoring, and reiterated that this meeting was not the comment period for the draft general permit. Thelma Murphy, EPA-New England's Stormwater Coordinator, then discussed the ongoing development of the next Small MS4 General Permit, which will replace the current one that expires May 2008. Ms. Murphy also reviewed the monitoring provisions in several other cities/states' stormwater permits, outlined potential aspects of monitoring, and asked for thoughts, experiences, and other information concerning the following monitoring-related topics: objectives, parameters, timeframe and scope. Numerous speakers representing towns, cities, non-profit organizations and consultants then spoke in turn, relating their experiences and concerns regarding monitoring.

Major themes of discussion during the meeting included definitions, criteria, data gathering, reporting and use, the role of watershed associations, wet-weather v. dry-weather monitoring, funding and costs, and EPA's continuing guidance.

Definitions/Terminology/Criteria

People expressed concern with the lack of a universal definition of outfall, and how the definition would impact the number of outfalls to be monitored, and which to make focal points. The example of whether storm drains with multiple connections (pipe-stream-pipe-pond-river connections) count as one outfall or many was presented to illustrate the issue. Several people who spoke preferred monitoring waterbodies instead of outfalls.

Participants also wanted the definition of monitoring to be clearly described, and to address whether inspections and visual counts constitute monitoring. People wanted to know what will need to be monitored, how much sampling will be required, and how to determine when compliance has been met. The timeframe of monitoring was also discussed, in terms of when (seasonally), how often, and whether to focus on wet or dry weather sampling. Several speakers suggested a regional approach could

work more efficiently for groupings of towns, and that this option should be allowed in the next permit. Others advocated using lower-cost options that are not always considered traditional monitoring, but which can help identify problems, such as optical brightener testing, and visual and olfactory assessments.

While there was general agreement that wet-weather monitoring can provide useful data, many people also expressed concern that it is hard to do correctly, can be inconsistent, is expensive and time consuming, and does not provide the whole picture of an area's water quality. Several participants discussed the complexities of determining whether a storm is a "qualifying event," and whether data taken from a non-qualifying event can be considered conclusive.

The role of watershed associations and the data they provide was also discussed. Several participants indicated they felt that associations have a very useful role, particularly with bacterial monitoring at outfalls and with long-term planning and prioritization efforts. One participant advocated watershed associations as coordinators of monitoring efforts, encouraged them to be listed as resources for communities in the new permit, and noted that monitoring data will help identify sub-watersheds of concern, and help find other entities who may be contributors to the water quality problem. Finally, there was a question posed as to whether watershed association data was acceptable for official reporting.

Funding

Funding was a major part of the discussion. People with experience doing monitoring expressed concern that it is difficult to get from outside sources, as well as hard to extract from already existing budgets. In addition, others asserted they believed most DPWs already know problem areas or can find them with lower cost methods. Some people felt it was more important to spend money on fixing existing problems than assessing areas of no known problem. Many speakers cited the need for help accessing or finding money specifically for monitoring activities.

EPA

Many participants felt that EPA must be flexible, and should give only broad monitoring goals and let towns design how to implement or accomplish these. One person mentioned that EPA needs to provide more media releases, with more information to the public. Also, EPA should reward and recognize the achievements of municipalities that have done monitoring work already, and give serious attention to municipalities that have not done work.

EPA-New England appreciates all the comments and ideas that were expressed at the meeting. They will be taken into consideration while developing the next general permit. Thank you to all who attended and participated.