Part I: General Conditions **General Information** State: MA Name of Municipality or Organization: | Bridgewater State University EPA NPDES Permit Number (if applicable): |MAR04027/MADEP#W040327 **Primary MS4 Program Manager Contact Information** Name: Ms. Karen Jason Title: Vice President of Operations Street Address Line 1: Office of Facilities Management and Planning Street Address Line 2: Operations Center City: Bridgewater State: MA Zip Code: 02325 kjason@bridgew.edu (508) 531-2750 Email: Phone Number: Fax Number: (508) 531-4060 Other Information Stormwater Management Program (SWMP) Location Environmental Health and Safety Office (web address or physical location, if already completed): **Eligibility Determination** Eligibility Criteria Endangered Species Act (ESA) Determination Complete? Yes \square A \square B \boxtimes C (check all that apply): Eligibility Criteria National Historic Preservation Act (NHPA) Determination Complete? Yes \square A \boxtimes B \square C (check all that apply): $\overline{}$ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit MS4 Infrastructure (if covered under the 2003 permit) **Estimated Percent of Outfall Map Complete?** If 100% of 2003 requirements not met, enter an 100% (Part II, III, IV or V, Subpart B.3.(a.) of 2003 permit) estimated date of completion (MM/DD/YY): Web address where MS4 map is published: N/A - See NOI Form Attachments for paper copy of outfall map. If outfall map is unavailable on the internet an electronic or paper copy of the outfall map must be included with NOI submission (see section V for submission options) Regulatory Authorities (if covered under the 2003 permit) Illicit Discharge Detection and Elimination (IDDE) Authority Adopted? **Effective Date or Estimated** No 06/30/19 (Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit) Date of Adoption (MM/DD/YY): Construction/Erosion and Sediment Control (ESC) Authority Adopted? Effective Date or Estimated No 06/30/19 (Part II,III,IV or V, Subpart B.4.(a.) of 2003 permit) Date of Adoption (MM/DD/YY): **Post- Construction Stormwater Management Adopted?** Effective Date or Estimated Νo 06/30/19 (Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit) Date of Adoption (MM/DD/YY):

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Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part II: Summary of Receiving Waters

Please list the waterbody segments to which your MS4 discharges. For each waterbody segment, please report the number of outfalls discharging into it and, if applicable, any impairments.

Massachusetts list of impaired waters: Massachusetts 2014 List of Impaired Waters- http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf

Check off relevant pollutants for discharges to impaired waterbodies (see above 303(d) lists) without an approved TMDL in accordance with part 2.2.2.a of the permit. List any other pollutants in the last column, if applicable.

Waterbody segment that receives flow from the MS4	Number of outfalls into receiving water segment	Chloride	Chlorophyll-a	Dissolved Oxygen/ DO Saturation	Nitrogen	Oil & Grease/ PAH	Phosphorus	Solids/TSS/	l urbidity -	E. coli	Enterococcus	Other pollutant(s) causing impairments
Town River - MA62-13	2											
South Brook (trib. to Town River)	1											
] [
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Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	BMP Description	Targeted Audience	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal	Beginning Year of BMP Imple- mentation
Electronic Brochures/Handouts	Email with educational material on stormwater management sent in BSU's Community Announcements to all faculty and staff	Faculty/Staff	BSU Facilities Management/Administration	Send annually and assess effectiveness	2005
Electronic Brochures/Handouts	Email with educational material on stormwater management sent to all students	Students	BSU Facilities Management/Administration	Send annually and assess effectiveness	2017
Displays/Posters	Educational information on stormwater management displayed in common areas at student residence buildings	Students	BSU Facilities Management	Post new educational material annually and assess effectiveness	2019
Workshops	Workshop targeting stormwater issues and Stormwater Management Program presented on campus	Faculty/Staff/Students	BSU Facilities Management	Hold every second year and assess effectiveness	2018

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Press Releases	Important information on stormwater management program (i.e., adoption of policies, opportunities for community engagement, goals achieved) written up in press release	Faculty/Staff/Students	BSU Facilities Management	Distribute as needed and assess effectiveness	2018
School Curricula/Programs	Stormwater management included as a topic in class curricula and/or worked into a class field or research- related assignment	Students	BSU Facilities Management/Faculty	Offer class with stormwater-related content and assess effectiveness	2017
Signage	Educational information displayed at location of stormwater management measure/process	Faculty/Staff/Students	BSU Facilities Management	Signs will be installed on a persite basis, dependent on the stormwater approach and facilities constructed.	2018
Webpage	Educational information on stormwater issues and management provided on dedicated stormwater web page on BSU's website	Faculty/Staff/students	BSU Facilities Management	Check web page for updates annually and assess effectiveness	2019

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Part III: Stormwater Management Program Summary (continued)

MCM 2: Public Involvement and Participation

BMP Categorization	Brief BMP Description (enter your own text to override the drop down menu)	Responsible Department/Parties (enter your own text to override the drop down menu)	Additional Description/ Measurable Goal	Beginning Year of BMP Imple- mentation
Public Review	SWMP Review	BSU Facilities Management	Make SWMP and annual reports available to BSU community for review	2018
Public Participation	Public Meeting - Stormwater	BSU Facilities Management	Allow public to comment on stormwater management plan annually	2018
Public Participation	Catch Basin Stenciling/Markers	BSU Facilities Management	Review storm drains on campus annually and re- paint "No Dumping Drains to River" at storm drains where stencil has worn away	2005
Public Participation	Hotline/webline - reporting problems/violations	BSU Facilities Management	Make web-line available for BSU community to report stormwater-related problems or concerns	2018
Public Participation	Clean-up	BSU Facilities Management	Organize annual clean-up of designated areas on campus	2006
Public Participation	Advisory Committee	BSU Facilities Management	Meet biannually to review and evaluate effectiveness of education and engagement opportunities available to BSU community relative to stormwater management	2018

Part III: Stormwater Management Program Summary (continued)

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP Categorization (enter your own text to override the drop down menu)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Imple- mentation
SSO inventory	Develop SSO inventory in accordance of permit conditions	BSU Facilities Management	Develop within 1 year of effective date of permit (06/30/2019)	2018
Storm Sewer System Map	Create map and update during IDDE program completion	BSU Facilities Management	Update map within 2 years of effective date of permit (06/30/2020) and complete full system map 10 years after effective date of permit (06/30/2029)	2018
IDDE program - Development	Create written IDDE program	BSU Facilities Management	Complete within 1 year of the effective date of permit (06/30/2019), except for catchment investigation procedure, which will be developed within 18 months of the permit effective date (12/31/2019)	2018
IDDE program - Implementation	Implement catchment investigations according to program and permit conditions	BSU Facilities Management	Implement in accordance with IDDE Program procedures and permit conditions	2019
Employee training	Train employees on IDDE implementation	BSU Facilities Management	Train annually	2018
Dry Weather Screening	Conduct in accordance with outfall screening procedure and permit conditions	BSU Facilities Management	Conduct in accordance with the screening and sampling procedures included in the IDDE Program and permit conditions. Inspect all	2021
Wet Weather Screening	Conduct in accordance with outfall screening procedure	BSU Facilities Management	Conduct in accordance with the screening and sampling procedure included in the IDDE Program and permit conditions.	2021

Part III: Stormwater Management Program Summary (continued)

MCM 4: Construction Site Stormwater Runoff Control

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Imple- mentation
Construction Site Stormwater Runoff Control (CSSRC) Program - Site Inspections	Written procedures for site inspections and enforcement of ESC measures	BSU Facilities Management	Complete within 1 year of effective date of permit (06/30/2019)	2018
CSSRC Program - Site Plan Review	Written procedures for site plan review, inspection and enforcement	BSU Facilities Management	Complete within 1 year of effective date of permit (06/30/2019)	2018
CSSRC Program - Erosion and Sediment Control	Adoption of requirements for construction operators to implement ESC program	BSU Facilities Management	Complete within 1 year of effective date of permit (06/30/2019)	2018
CSSRC Program - Waste Control	Adoption of requirements for construction operators to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes.	BSU Facilities Management	Complete within 1 year of effective date of permit (06/30/2019)	2018

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Part III: Stormwater Management Program Summary (continued)

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Imple- mentation
Post-Construction -As-Built Plans	Written procedures to require submission of asbuilt drawings depicting on-site stormwater control and ensure long term operation and maintenance of stormwater management practices upon completion of a construction project	BSU Facilities Management	Require submission of as-built plans no later than 2 years after completion of construction projects	2018
Retrofit Inventory	Sites on campus priority ranked for retrofit potential; minimum of 5 sites	BSU Facilities Management	Complete within 4 years of effective date of permit (06/30/2022)	2022
Green Infrastructure Review	Update of campus guidelines to promote green infrastructure practices when appropriate site conditions exist.	BSU Facilities Management	Complete within 4 years of effective date of permit (06/30/2022)	2022

Bridgewater State University	T		<u> </u>	age 13 of
Oriveway and Parking Lot Guidelines Review	Review of current campus guidelines to determine if design standards for streets and parking lots can be modified to support reduced impervious cover and low impact design options. Update campus guidelines where appropriate.	BSU Facilities Management	Complete within 4 years of effective date of permit (06/30/2022)	2022
Review and Update Post-Construction Design Standards for New Development and Redevelopment	Written procedures to ensure stormwater management practices for new development and redevelopment will prevent or minimize impacts to water quality	BSU Facilities Management	Standards were established in 2010. Ongoing activity to review and update within 2 years of effective date of permit (06/30/2020)	2020
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Bridgewater State University				

Part III: Stormwater Management Program Summary (continued)

MCM 6: Municipal Good Housekeeping and Pollution Prevention

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Imple- mentation
Facilities O&M Plan	Written O&M procedures for open spaces and athletic facilities; buildings, parking lots and maintenance yards; and BSU-owned vehicles and equipment	BSU Facilities Management	Complete within 2 years of effective date of permit (06/30/2020)	2020
Facilities Inventory	Inventory all open spaces and athletic facilities; buildings, parking lots and maintenance yards, and BSU-owned vehicles and equipment		Complete within 2 years of effective date of permit (06/30/2020)	2020
Infrastructure O&M Plan	Written O&M procedures for timely maintenance of campus infrastructure	BSU Facilities Management	Complete within 2 years of effective date of permit (06/30/2020)	2020
Stormwater Pollution Prevention Plan (SWPPP)	Written SWPPP for maintenance yards and other waste-handling facilities		Complete and implement no later than 2 years from effective date of permit (06/30/2020)	2020
Catch Basin Cleaning	Cleaning of catch basins on a yearly basis	BSU Facilities Management	Clean annually	2005
Driveway and Parking Lot Sweeping Program	Sweeping of parking lots on a yearly basis to prevent pollutant runoff from sand throwing during winter months	BSU Facilities Management	Sweep annually	2005
Used Motor Oil Recycling	Used motor oil sent off- site for recycling	BSU Facilities Management	Renew recycling contract annually	2005
Employee Training	Training provided for all employees on proper spill clean-up and SWPPP	BSU Facilities Management	Train annually	2005

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BMP Maintenance	Inspection and maintenance of stormwater treatment structures on campus	BSU Facilities Management	Inspect annually	2018
Recycling Program	Management of recyclable materials on campus	BSU Facilities Management	Evaluate annually for effectiveness (number, location and use of recycling bins throughout campus)	2018
Trash Management	Management of trash on campus	BSU Facilities Management	Evaluate annually for effectiveness (number, location and use of trash bins throughout campus)	2018

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Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

Applicable TMDL	Action Description	Responsible Department/Parties (enter your own text to override the drop down menu)

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Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Requirements Related to Water Quality Limited Waters

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

Pollutant	Waterbody ID(s)	Action Description	Responsible Department/Parties (enter your own text to override the drop down menu)
_			

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Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.1 and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary. Also, provide any additional information about your MS4 program below.

As a University owned and operated by the Commonwealth of Massachusetts, Bridgewater State University is considered a non-traditional MS4. The BMPs outlined in this Notice of Intent were aligned with the requirements of Section 5.0 Non-Traditional MS4s of the Massachusetts Small MS4 Permit. The public education BMPs target the employees, faculty members and students and will incorporate educational topics specific to these target audiences. As a non-traditional MS4, BSU does not have the authority to enact ordinances or regulations; however, the university will ensure written policies or procedures are in plan to address the requirements to develop an Illicit Discharge Detection and Elimination program and post-construction stormwater design guidelines. The BMPs to address these requirements are noted in their respective BMP tables within this NOI form.

Consistent with their past NOIs submitted to EPA under the 2003 Small MS4 permit, BSU is currently implementing BMPs on campus including public education and outreach (electronic brochures, handouts), public involvement and participation (catch basin stenciling, annual campus clean-ups), and good housekeeping and pollution prevention (catch basin cleaning, driveway and parking lot sweeping, recycling of used motor oil off-site, training for all employees on proper spill clean-up). Descriptions and targeted audiences for these BMPs are noted within this NOI form, along with the new BMPs that the university will be implementing to comply with the 2018 permit conditions.

One on-going education program related to the MS4 permit program is the University's research on insectivorous bat species, which is being led by Staff Associate Maria Armour, MS, in the Department of Biological Services. The Great Hill Trail system located on the campus of Bridgewater State University provides excellent habitat for insectivorous bat species of Massachusetts due to the mixed hardwood forest, potential flyways, extensive forest edge, and proximity to natural bodies of water. Over the past year, active acoustic recordings have been conducted on campus grounds. Three of the nine species found in MA have documented: Big Brown bat (Eptesicus fuscus), Easter Red bat (Lasiurus borealis), and Hoary bat (L. cinereus). The species habitat preferences and behavior patterns, of the the Northern Long-eared bat (Myotis septentrionalis) and Little Brown bat (Myotis lucifugus) and their activity during summer months is being studied. Both of these species are clutter specialists and prefer mixed deciduous forests. These two myotis species are listed as either Endangered or Threatened for both their state and federal status. Since 2006, regional populations of hibernating bats have experienced mass mortality due to a large-scale epizootic disease, White Nose Syndrome. Long-term assessment (both acoustic and biological in nature) of the region's bat activity and presence may offer valuable population data on the affect environmental and human-driven pressures (anthropogenic structures, human disturbance and diseases including White Nose Syndrome) have on regional bat populations.

The University is also performing research that includes wet weather monitoring of storm events in their Watershed Lab, under the direction of Kevin Curry. The monitoring includes the collection and testing of samples from parking lots to support the environmental education outreach and in the University's NOAA BWET grant. Undergraduate students present the results of the data collections through research posters.

These research programs and associated classes/curriculum will be further detailed in the Stormwater Management Program and as a BMP under MCM 1 - Public Education and Outreach.

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Part V: Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:	Karen W. Jason	Title:	Vice President for Operations
Signature:	[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]		09/26/18

Note: When prompted during signing, save the document under a new file name

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Part V: Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:	Karen W. Jason	Title:	Vice President for Operations	
Signature:	[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]	Date:	9/26/18	

Note: When prompted during signing, save the document under a new file name

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NOI FOR ENDANGERED SPECIES GUIDANCE

To assess the impacts of stormwater discharges and discharge-related activities on Bridgewater State University, the Endangered Species Guidance (ESA) eligibility provisions of the MA MS4 General Permit were made by following the steps in Appendix C – Endangered Species Guidance.

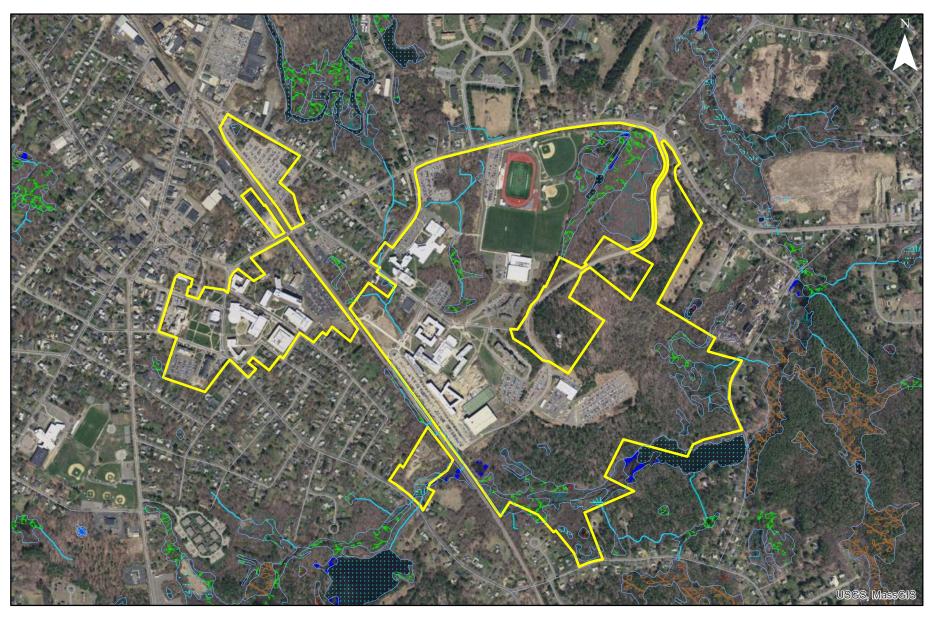
Upon completing the Information, Planning, and Conservation (IPaC) online system process and our phone call with Newton Tedder on May 19th, Physical Scientist at US EPA, we determined Northern Long-eared Bat (*Myotis septentriolis*) as species of concern for our action area. We documented the results of our eligibility under **USFWC Criterion C** by providing a preliminary determination through IPaC which indicates that our action area contains the Northen Long-eared Bat, but no critical habitat has been designated for this species. An endangered species map was created to support our findings. (See Attachment 1). We are requesting concurrence from the EPA to determine that discharge and discharge related activities on campus indicate that there would be "no affect" on listed species or critical habitat. Once we receive documentation of EPA's concurrence, it will be included in the Storm Water Management Program required by the permit.

The Owner agrees that if, during the course of the permit term, the Owner plans to install a structural BMP not identified in the NOI, the Owner will conduct an endangered species screening for the proposed site and contact the USFWS if it is determined that the new activity "may affect" or is "not likely to adversely affect" listed species or critical habitat under the jurisdiction of the USFWS.

NOI FOR NATIONAL HISTORIC PRESERVATION ACT GUIDANCE

To assess the effects of Federal "undertakings" on historic properties that are listed on, or eligible for listing on, the National Register of Historic Places for Bridgewater State University, the ESA eligibility provisions of the MA MS4 General Permit were made by following the steps in Appendix D – National Historic Preservation Act Guidance.

Properties listed in the National Register of Historic Places for the town of Bridgewater, which include William H. McElwain School and Bridgewater Iron Works, are outside our action area. It was therefore determined that we meet eligibility under **Criterion B**. To certify eligibility under Criterion B, a historic map was created to support our findings. Thus, discharges from the action area do not have the potential to cause effects on historic properties. (See Attachment 2) **We are requesting concurrence from the EPA in writing to determine that discharges do not have the potential to cause effects on historic properties.** Once we receive documentation of EPA's concurrence, it will be included in the Storm Water Management Program required by the permit.



Endangered Species Map

Bridgewater State University Bridgewater, Massachusetts

Data Source: MassGIS Nitsch Project #11917

Attachment 1

Legend

BSU Campus Boundary Town Boundary



• NHESP Potential Vernal Pools

DEP Wetlands (2005) Hydrologic Connections

DEEP MARSH

OPEN WATER

SHALLOW MARSH MEADOW OR FEN

SHRUB SWAMP

WOODED SWAMP DECIDUOUS

WOODED SWAMP MIXED TREES

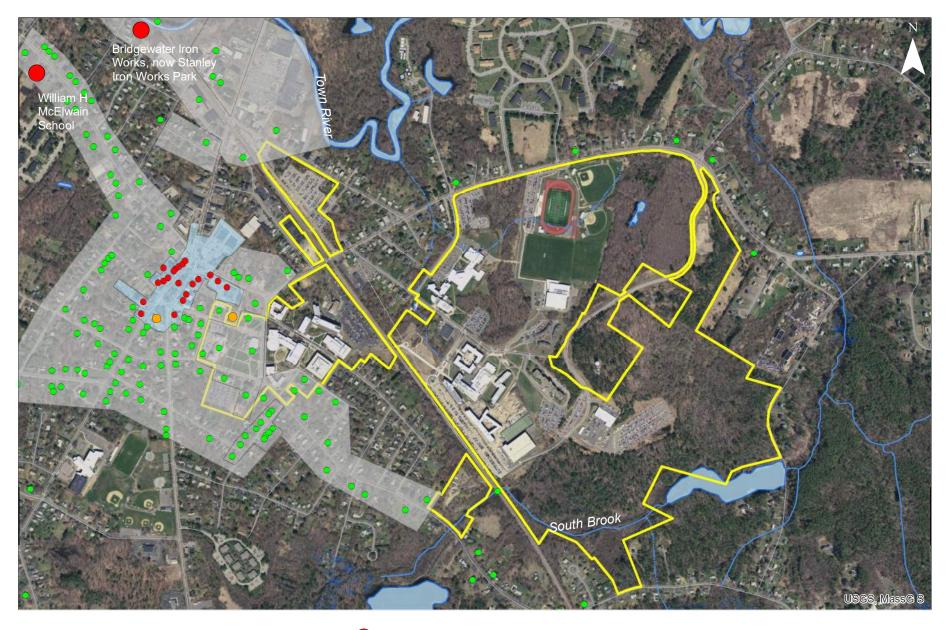


2,000

■ Feet

500 1,000

*Information, Planning, and Conservation (IPaC) online system process determines Northern Long-eared Bat (Myotis septentriolis) as species of concern for this area.



Historic Map

Bridgewater State University Bridgewater, Massachusetts

Data Source: MassGIS Nitsch Project #11917

Attachment 2









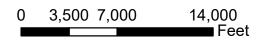
Watershed Map

Bridgewater State University Bridgewater, Massachusetts

Data Source: MassGIS Nitsch Project #11917

Attachment 3







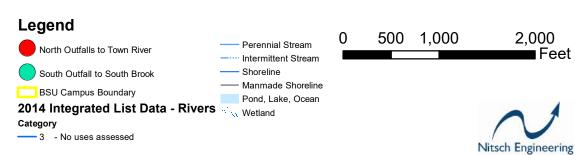


Outfall Map

Bridgewater State University Bridgewater, Massachusetts

Data Source: MassGIS Nitsch Project #11917

Attachment 4



Tedder, Newton

From: Tedder, Newton

Sent: Wednesday, March 13, 2019 4:18 PM

To: 'lkjason@bridgew.edu'
Cc: Reports Stormwater

Subject: Bridgewater State MS4 NOI NHPA and ESA concurrence

Ms. Jason

Based on information submitted with your NOI EPA concurs that discharges do not have the potential to cause effects on historic properties and will have no effect on listed species present in your action area.

Thank you

Newton W. Tedder

U.S. Environmental Protection Agency, Region 1 5 Post Office Square, Suite 100 Mail Code OEP06-4 Boston, MA 02109-3912 Phone: (617) 918-1038

All drains lead to the ocean

Tedder, Newton

From: Jason, Karen <KJASON@bridgew.edu>
Sent: Tuesday, April 09, 2019 7:42 PM

To: Tedder, Newton
Cc: Reports Stormwater

Subject: Re: 2016 MA MS4 NOI additional information request

Yes, I acknowledge we will follow requirements of Appendix H, part 1 for BSU. Thank you for sending the reminder.

Karen W. Jason Vice President Division of Operations Bridgewater State University

Sent from my iPhone

On Apr 9, 2019, at 11:07 AM, Tedder, Newton <Tedder.Newton@epa.gov> wrote:

CAUTION: This email was generated from outside the organization. Please do not click on any links or attachments unless you have verified the legitimacy of this email.

Ms. Jason.

Please reply to the inquiry below. If we do not receive a response from you within 30 days of this email EPA may terminate your NOI for coverage under this permit

Newton Tedder 617- 918-1038

From: Tedder, Newton

Sent: Wednesday, March 13, 2019 4:55 PM **To:** 'kjason@bridgew.edu' <kjason@bridgew.edu>

Cc: Reports Stormwater < Subject: 2016 MA MS4 NOI additional information request

Ms. Jason

In order to complete the review of your NOI please respond to this email acknowledging you will follow the requirements of Appendix H Part I for your site. You are located within the Taunton River Watershed discharging to waterbodies tributary to water(s) impaired due to nitrogen and must adhere to the requirements in Appendix H Part I. You do not need to resubmit your NOI and a response via email is sufficient.

In addition, this email serves as EPA's concurrence that discharges do not have the potential to cause effects on historic properties and will have no effect on listed species present in your action area based on information submitted with your NOI.

Thank you

Newton W. Tedder

U.S. Environmental Protection Agency, Region 1 5 Post Office Square, Suite 100 Mail Code OEP06-4 Boston, MA 02109-3912 Phone: (617) 918-1038

All drains lead to the ocean

Newton W. Tedder

U.S. Environmental Protection Agency, Region 1 5 Post Office Square, Suite 100 Mail Code OEP06-4 Boston, MA 02109-3912 Phone: (617) 918-1038

All drains lead to the ocean