



Town Administrator
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Town of Carlisle

Office of

BOARD OF SELECTMEN

66 WESTFORD STREET
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August 3, 2015

Mr. Newton W. Tedder
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, Massachusetts 02109-3912

Dear Mr. Tedder:

We received EPA's notification that our Town may be subject to the upcoming MS4 permit and would like to request that EPA exercise its authority to grant an MS4 waiver for our Town.

The Town of Carlisle was granted a waiver from the 2003 MS4 permit and we strongly believe the same conditions exist that would justify a waiver for the new permit.

The reasons we are requesting a waiver are as follows:

- Our Town's MS4 system does not connect to any adjacent MS4 system
- With only 723 (according to the Northern Middlesex Council of Covenants) people living in the urbanized area the amount of pollution contributed to the receiving waters is negligible.

Thank you for your consideration.

Sincerely,


Timothy D. Goddard
Town Administrator

MS4 Waiver Sample Letter

Newton W. Tedder
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912

Dear Mr. Tedder:

We received EPA's notification that our Town may be subject to the upcoming MS4 permit and would like to request that EPA exercise its authority to grant an MS4 waiver for our Town.

The Town of Carleah was granted a waiver from the 2003 MS4 permit and we strongly believe the same conditions exist that would justify a waiver from the new permit.

In general (in your own words, say why you think a waiver is justified)

We've reviewed the list of impaired waters and TMDLs in the draft MS4 permit and the 2012 303(d) list found that our Town these waterbodies are impaired for phosphorus and are subject to these TMDLs.

The reasons we are requesting a waiver are as follows:

- Our Town's MS4 system does not connect to any adjacent MS4 system ~~OR Our Town's MS4 system connects to the following adjacent MS4 system: _____.~~

~~The reason we are asking for this waiver is that (use any that apply)~~

- 723 (according to the Northern Middlesex Council of Governments)*
- ☒ With only 758 people living in the urbanized area the amount of pollution contributed to the receiving waters is negligible.
 - The impairments and TMDLs do not include stormwater as a significant source of pollutants
 - Our municipal stormwater system is much smaller than the urbanized area, as we've shown on the attached map. Therefore the Town's contribution of pollutants from its stormwater system should be considered negligible.
 - We reviewed the urbanized area map and believe that the US Census overestimated the geographic extent of the urbanized area of our Town. Substantial portions of the mapped area are rural and without any stormwater system. We've attached a map showing those areas that we believe should not be considered as urbanized.
 - The population in the mapped area has been calculated incorrectly by the US Census. Our estimate of the population is _____.
 - We have spoken with MassDEP about our request and DEP agrees that the contribution of (list pollutants here) from our stormwater system into the (name receiving waters here) is de minimus.

Thank you for your consideration.

Sincerely
T.D.
TA