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**Subject:** Comments from AVSWG, BASWG, ISWG, SMSWG, MEWEA, MMA, DOT, and MTA on 6/23/2020 MS4 Final Draft GP  
**Date:** Friday, July 10, 2020 10:59:51 AM  
**Attachments:** [image001.png](#)  
[01 Table Statewide TMDLs MS4s 2020 07 08.xlsx](#)  
[02 Attachment E from CAMSGP amend 2019.pdf](#)

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Good Morning Gregg and Rhonda,

Thanks for providing the opportunity to comment on the Maine MS4 General Permit (GP) issued as Final Draft on 6/23/2020. Thank you also for incorporating so many of our comments over the course of the stakeholder process.

On behalf of ISWG, BASWG, SMSWG, AVSWG, Maine DOT, MTA, MEWEA, and MMA we are providing the following comments. We also incorporate by reference all of the comments we provided during the stakeholder process.

1. Page 5 of 54 (Part I(B)(1) Effective date of this General Permit): As stated in our comments on the 7<sup>th</sup> preliminary draft submitted via email on 7/19/2019, changing the Permit Year to be from September to August will significantly complicate the municipalities' budgeting processes for MS4 services because they will need to split the requirements for a single permit year across multiple fiscal years. All of the ISWG and SMSWG communities run on a fiscal year that begins on July 1, and most of the other regulated communities do also. We are asking that the Department consider the following alternative options:
  - a. Change the effective date to July 1, 2022 to maintain the July 1 to June 30 permit year. Although this would add Permit Year 9 to the current permit cycle, we believe this extension is justified given the extraordinary measures we have all had to take to address the health and safety issues associated with the COVID-19 pandemic (such as adjustments to work processes, budget constraints, and reduced staffing to ensure social distancing). This is our preferred alternative.
  - b. Keep the September 1, 2021 effective date by extending Permit Year 8 of this cycle to August 31, 2021 and shorten the first Permit Year of the next cycle to 10 months (running from September 1, 2021 to June 30, 2022). We have concerns about completing all required tasks within a shortened Permit Year 1, which would be exacerbated if the effective date extends out beyond September 1, 2021, but could organize our tasks to meet the shortened year if the Department would accommodate

this during SWMP approvals.

2. Page 11 of 54 (Part II(L) Dry Weather Flow): Please maintain the 72-hour dry period in the definition of Dry Weather Flow. Some outfalls have very large drainage areas that can take up to 72 hours to drain. Additionally, the 72-hour timeframe is referenced in the Dry Weather Inspection definition and this should be consistent with the definition of Dry Weather Flow (which now references 48-hours).
3. Page 15 of 54 (Part II(RR) Waters of the State): Remove the recent addition of “(including wetlands)” in the definition of Waters of the State. The definition of “Waters of the State” is set out in statute at 38 M.R.S. § 361. The Department does not have the authority to revise it pursuant to a general permit and having more than one definition in law is likely to create confusion.
4. Page 19 of 54 (Part III(A)(8) Permittee Specific DEP Order): We request that within 60 days of the end of the public comment period the Department issue a permittee specific DEP Order.
5. Page 21 of 54 (Part IV(B) Modified SWMP): We request 60 days to update the initial SWMP to include how the permittee will meet all requirements of the DEP Order and summarize comments received and addressed in the SWMP. Additionally, the last sentence of this paragraph states that to modify the schedule established in the DEP Order the “*permittee must file a permit application with the Department that includes a justification to formally modify the original permittee specific DEP Order.*” Please define what a “*permit application*” is in this instance, given that the program operates based on a notice of intent (NOI).
6. Page 21 of 54 (Part IV(B)(2) Keeping Plans Current): The requirement to allow the public to comment on changes made to the SWMP at least once per year is confusing. If a SWMP is not changed over the course of a year is the permittee still required to allow the public the opportunity to comment on the SWMP? Alternatively, if a permittee makes changes to their SWMP in the first month of the permit year can they wait until the end of the permit year before allowing the public to comment?
7. Page 22 of 54 (Part IV(B)(2) Keeping Plans Current, last paragraph): For best management practices (BMPs) that are not required for compliance with the GP, we suggest that the BMPs and/or implementation schedule should be amended “***as appropriate without the need for public comment,***” rather than “*as needed*” to avoid any confusion that such changes require public comment.
8. Page 28 of 54 (Part IV(c)(3)(e)(iv) Sampling dry weather flow): The Department has re-worded this section, but the typographic errors and omission of some words and concepts make it difficult to interpret. We are providing the following suggested revision: “*Where dry weather flow is present, the permittee must sample the discharge to determine if the discharge is an illicit discharge **and then must investigate** until either a source is identified, or it has been determined that the evidence of the illicit discharge is due to naturally occurring source(s).*” Also, the section has two subparts to it, with no “and” or “or” to clarify whether the permittee may choose between the subparts or must do both. Subpart 1 (Part IV(c)(3)(e)(iv)(1) Sampling

and analysis) has several typos which we have addressed at the end of this email, and subpart 2 (Part IV(c)(3)(e)(iv)(2) network investigation) is not needed considering Part IV(c)(3)(e)(iv) requires investigation “*until either a source is identified, or it has been determined that the evidence of the illicit discharge is due to naturally occurring source(s).*” Thus, we recommend clarifying the language in Part IV(c)(3)(e)(iv) about investigating an illicit discharge and then deleting Part IV(c)(3)(e)(iv)(2).

9. Page 31 of 54 (Part IV(C)(3)(g) SSO reporting): We have commented multiple times that the requirement to report Sanitary Sewer Overflows (SSOs) to the Department is already part of Wastewater Discharge Licenses for Sanitary Sewer Districts and Departments. The Department will be receiving duplicate reports of the same SSOs (one from a Sanitary Sewer operator, and one from an MS4 operator). We request again that you delete this requirement from the permit, or at a minimum adjust the language so that permittees are required to summarize “**only**” the SSO events “**that discharge to the MS4**” in their annual reports.
10. Page 30 of 54 (Part IV(C)(3)(f) Wet weather assessment, last paragraph): We would like to re-iterate our comment that we should not be required to conduct wet weather monitoring until the next (2026) MS4 General Permit becomes effective.
11. Page 34 of 54 (Part IV(C)(5)(b) Low Impact Development): The proposed language under Part IV(C)(5)(b) would require MS4s to create an ordinance or other regulatory mechanism requiring Low Impact Development (LID) to the maximum extent feasible, which will be very time consuming and costly for communities to develop and implement. If the Department feels it is appropriate to require LID for development projects, it should modify the state stormwater regulations to do so, not impose this requirement on MS4s to develop and implement on behalf of the State. In addition, the reference to LID seems misplaced in this section, which is about ensuring “*adequate long-term operation and maintenance of post construction BMPs.*” A requirement related to LID would make more sense under the Part IV(C)(5)(a) requirement to “*promote strategies which include a combination of structural and/or non-structural BMPs appropriate to prevent or minimize water quality impacts.*” The 2013-2018 MS4 permit requirement to develop and implement a procedure for notifying site developers to consider incorporating LID techniques was fairly effective for many communities. Some implemented ordinance requirements stating that developers either incorporate LID or provide a rationale with their Planning Board submittals as to why LID was not feasible at their site. If the Department must add LID language, please re-institute the 2013-2018 MS4 permit language.
12. Page 35 of 54 (Part IV(C)(6)(d)(1) Control measures): Please remove the total maximum daily load (TMDL) reference in this section. The GP already includes a section with requirements for TMDL waters and any TMDL requirements should be specified therein.
13. Page 36 of 54 (Part IV(C)(6)(d)(1)(d) Minimizing impervious areas) and page 44 of 54 (Part IV(C)(6)(d)(4)(a)(v) Minimizing impervious areas): These sections include requirements to consider “*infiltrating runoff onsite*” with costly green infrastructure options at bus garages,

public works facilities, and recycling centers. We understand these requirements are just copied over from the Maine 2016 Multi-Sector General Permit (2016 MSGP), but they have potentially large costly implications for MS4s, and are better suited for inclusion in statewide development regulations than in this GP.

14. Page 37 of 54 (Part IV(C)(6)(d)(2)(b)(iii) Dumpster Lids): Please remove the requirement to provide secondary containment for dumpsters, waste bins and roll-off containers that do not have lids. It is not consistent to require secondary containment or cover for roll-offs when storage piles can remain on-site uncovered and Solid Waste Rules do not require coverings for roll-off containers or dumpsters. In addition, it is extremely difficult and costly in terms of time and expense to comply with this requirement, especially for inert item residential drop off at recycling centers and transfer stations such as bulky roll-offs and wood waste roll-offs.
15. Page 37 of 54 (Part IV(C)(6)(d)(2)(b)(v) Pre-production plastic): Please remove the requirement to implement best management practices for pre-production plastic. Municipal transfer stations, bus garages, and public works facilities do not handle pre-production plastic.
16. Page 40 of 54 (Part IV(C)(6)(d)(3)(a) Availability of SWPPP): Previously the Department had indicated that SWPPPs must be updated prior to the effective date of the GP, not the date of the NOI submission. Additionally, the requirement to update SWPPPs prior to submission of a NOI is inconsistent with the next paragraph (Part IV(C)(6)(d)(3)(b) SWPPP preparation) that indicates the SWPPP must be up-to-date prior to the effective date of this GP. Please revise Part IV(C)(6)(d)(3)(a) Availability of SWPPP to be consistent with Part IV(C)(6)(d)(3)(b) SWPPP preparation, which requires permittees to update SWPPPs by the effective date of this GP.
17. Page 41 of 54 (Part IV(C)(6)(d)(3)(d) SWPPP Contents): This section has been modified to refer to a municipality rather than a facility; however, a SWPPP is required for each public works facility, transfer station, and/or school bus maintenance facility that the municipality operates in the MS4 urbanized area. Therefore, we see no reason to replace the term 'facility' with 'municipality' or to add the term "municipal operations". Is it DEP's intent to have municipalities maintain a single SWPPP that covers each public works facility, transfer station, and/or school bus maintenance facility operated by the municipality?
18. Page 41 of 54 (Part IV(C)(6)(d)(3)(d)(iii)(8) Aboveground Tanks): The reference to aboveground wastewater or process water containment tanks is more suited to industrial facilities. Please update this item to include the location of all 'aboveground tanks' on the map.
19. Page 42 of 54 (Part IV(C)(6)(d)(3)(d)(iii)(11) Locations of stormwater features): This GP defines the term 'outfall' differently than the 2016 MSGP. The Department should consider using the term 'discharge point' when referring to 'outfalls' in the SWPPP Contents. This will help to clarify that a discharge point from a public works facility should be monitored even if it is not an outfall to "waters of the State" or another MS4.
20. Page 43 of 54 (Part IV(C)(6)(d)(3)(e)(iv) Wastewater or process water containment): In previous comments on preliminary drafts, we asked if the secondary containment requirements are applicable to storage tanks for deicing fluids, such as magnesium chloride,

since these tanks do not have any federal or state requirements for secondary containment. Please clarify the types of containers that require secondary containment. And if the Department believes that deicing fluids require secondary containment, they should modify their rules so this requirement is statewide, not MS4 specific.

21. Page 45 of 54 (Part IV(C)(6)(d)(5)(a) Procedures for conducting monitoring): Please remove the requirement to conduct sampling and analysis in accordance with methods approved by 40 CFR Part 136 (three references). No sampling or analyses are required for MS4 facilities with SWPPPs, only visual monitoring and good housekeeping inspections are required. We believe these references are held over from the 2016 MSGP for Stormwater Discharges from Industrial Activities, which do have sampling and analysis requirements.
22. Page 47 of 54 (Part IV(C)(6)(d)(6)(c) Visual Monitoring): This section references the correct document number (DEPLW0768) for the Visual Monitoring of Stormwater Discharges Associated with Industrial Activity; however, the version of the document in Attachment E of the 6/23/2020 Final Draft GP has been superseded by the revised version dated June 12, 2017. Also, the 2016 MSGP includes the following waiver for visual monitoring: *“If a stormwater discharge event associated with a qualifying storm event does not occur during normal operating business hours an entire calendar quarter, the permittee must document in the SWPPP that there was no discharge to sample. Monitoring requirements under these circumstances are waived.”* Please update the attachment with the 2017 version of document DEPLW0768 and include the 2016 MSGP visual monitoring waiver language in this GP.
23. Page 49 of 54 (Part IV(C)(6)(d)(8)(c) Corrective Action Report): There is no Part IV(6)(d)(18)(a-e) of the GP. Please clarify the conditions under which corrective action review is required.
24. Page 50 of 54 (Part IV(C)(6)(d)(9) Record Keeping): Remove this section because there is a section on Page 52 that describes record keeping requirements for this GP. In addition, there is no reason to require these records be maintained with the SWPPP. The Clean Water Act requirements allow “normal business records” to be used (accounting files, Purchase orders, etc.) and accessed rather than having to duplicate these records to keep them with the SWPPP. Also, the SWPPP does not require sampling and analysis of outfalls, so the statement requiring “outfall monitoring results” does not apply.
25. Page 51 of 54 (Part IV(E) Discharges to Impaired Waters): We are again requesting that Part IV(E)(1) be changed to reflect the language that is in the 2013-2018 MS4 permit. The 6/23/2020 Final Draft GP language in Part IV(E)(1) requires permittees to *“propose clear, specific and measurable actions to comply with the TMDL waste load allocations (WLA)”* in their SWMPs, which is redundant with the urban impaired stream (UIS) requirements identified in Part IV(E)(3). Under Part IV(E)(3), MS4s must *“propose and fully implement at least three structural or non-structural BMPs”* for each UIS to assist in correcting water quality impairments. The Department has spent much time and energy identifying the stressors for the UISs and has identified that Urban Stormwater Runoff has affected them. The MS4s have been working hard to address the impairments associated with UISs over the past 10 years and will continue to do so under this MS4 permit. But we do not believe MS4s should be

required to complete any other activities regarding non-UIS TMDL waters.

To further explain our rationale on this subject, we have attached a table (01\_Table\_Statewide\_TMDLs\_MS4s\_2020\_07\_08.xlsx) showing the listing of statewide TMDLs that have been approved by the USEPA as of June 2020 and compared them to the UIS list. Most importantly, this table shows that every water that is listed in the Impervious Cover TMDL is also an Urban Impaired Stream. The table also shows that the other non-UIS TMDL waterbodies are either listed on the Bacteria TMDL or have their own TMDL. Though we have not done an exhaustive review, we have spent considerable time reviewing and summarizing this, even though we believe it is the Department's job to conduct such a review. Our cursory evaluation of the non-UIS TMDL waterbodies shows they fall into one of the following categories:

- a. Shellfishing areas subject to investigation and regulation by the Department of Marine Resources (DMR). MS4s already cooperate with DMR to conduct sampling and analysis and shoreline surveys under the DMR program and conduct investigations and remove illicit discharges under the MS4 program. If further work needs to be completed to correct impairments, it should be done by DMR under that program, and additional actions by MS4s are not appropriate. The challenges faced by shellfishing areas are not unique to MS4 municipalities; they are common throughout the Maine coast. Plans and implementation measures should be done on a statewide level to ensure consistency of regulations. A statewide approach will also ensure proper application of requirements of federal and state agencies with appropriate regulatory authority over shellfishing activities.
- b. Decades old TMDL documents that were prepared in 1998, 1999, and 2010 which have no specific actions or WLA related to stormwater issues. (e.g., Androscoggin River, Presumpscot River, Salmon Falls River, Penobscot River, and Piscataqua River Estuary). In fact, the 1998 Presumpscot River TMDL identifies a paper mill and various impoundments as sources of the impairment and has only the following discussion of stormwater as a source, (page 11 of the TMDL) "...upper Presumpscot should be closely watched in the future, since existing data may indicate the beginning of water quality problems from NPS pollution... if nonattainment continues to occur, a TMDL should be implemented for NPS Pollution". Clearly, there are not any actions required by the MS4s to address this TMDL, and the other older TMDLs have similar content. Similarly, the Androscoggin River/Gulf Island Pond TMDL does not contain any actions for MS4s and although there are Load Allocations for Non-Point Source Discharges, page 28 of this TMDL states that control on the non-point sources is not likely feasible.
- c. Freshwater listed in the bacteria TMDL, which states that MS4s must meet WLAs equivalent to the water quality standard for their freshwater classification. Under the MS4 IDDE program, MS4s will be sampling any dry weather flows for bacteria and investigating any potential illicit discharges. The IDDE work already required under the MS4 GP should be sufficient to address the TMDL requirement for these waters.
- d. Limited value waters, such as Mosher Brook where the MS4 applied for 604(b) funding to create a Watershed Management Plan to address the Bacteria TMDL impairment in 2018 and 2019. This application was denied by the Department in part

because “this small stream has very limited current and potential value” and because there is “Some good baseline data known, but many open questions would need to be answered” regarding the understanding of the water quality problems. Part IV(E)(1) of the 6/23/2020 Final Draft GP would require the municipality to do the work to identify the stressors and address the impairment(s) using their own general funds, even though the Department believes the small stream has limited current and potential value.

- e. De-listed Bacteria TMDL waters, such as the Piscataqua River (Falmouth and Cumberland) which is listed in the 2009 Bacteria TMDL; however, the 2016 303(d) list returned this waterbody to attainment status, so no MS4 actions should be required for this waterbody.
- f. De-listed individual TMDL waters, such as Highland Lake which had a TMDL issued in 2003 but was removed from the 303(d) list in 2010. The Highland Lake Association has been working for many years to correct impairments to this waterbody. In recent years, despite the 2010 delisting, the Highland Lake Leadership Team (HLLT) was established to ‘improve the water quality of Highland Lake’, primarily in response to a rare bacteria bloom that had been occurring. The HLLT is a partnership between the Town of Windham, Town of Falmouth, Highland Lake Association, DEP and CCSWCD. Although the cause of the bloom is still unknown, scientists and academia believe that reducing phosphorus to the lake is beneficial regardless. Therefore, the HLLT conducted a watershed survey, applied for and received 604(b) funds to update the watershed management plan, applied for and received 319 funds to implement a Phase IV NPS reduction project. Additionally, there were HLLT subcommittees that have reviewed, created and/or implemented ordinances and education & outreach to further this goal. The Town of Windham has budgeted approximately \$82,000, not including the Environmental and Sustainability Coordinator’s time, since 2018 to help accomplish these goals.

The following is the 2013-2018 MS4 permit TMDL language that should replace Part IV(E)(1) in the 6/23/2020 Final Draft GP:

*If the waterbody to which a discharge drains is impaired and has an EPA approved TMDL, then the discharge must be consistent with the TMDL waste load allocation (“WLA”) and any implementation plan. This general permit does not authorize a direct discharge that is inconsistent with the WLA of any EPA approved TMDL.*

As we stated in our comments on previous drafts: MS4s should not be the primary entities responsible for correcting water quality impairments for TMDL waters or for waters that have not yet received sufficient evaluation by the Department to have a TMDL document prepared. The full weight of correcting these water quality impairments should not rest on our shoulders.

Note that we have cc’d Don Witherill on this email and we encourage you to consult him and his Environmental Assessment staff who develop TMDL documents as you consider our comments. If after reviewing this, the Department still believes that MS4s need to take additional action for discharges to non-UIS TMDL waters they should either:

Update the TMDLs to better describe what action should be taken, or

- Provide guidance similar to Attachment E from the California MSGP that summarizes what TMDLs apply to stormwater discharges, and what additional actions are required for each impaired waterbody. Note that for many of the impaired waters, the California MSGP summary table states that the permittee must only comply with the General Permit requirements – no additional actions are required (see attachment named 02\_Attachment\_E\_from\_CAMSGP\_amend\_2019.pdf).

26. Page 52 of 54 (Part IV(E)(3) Urban Impaired Stream BMPs): Remove the sentence re-defining measurable in this paragraph, which insinuates it is the Permittee’s responsibility to assess the water quality status during the term of the permit. The previous sentence already requires that the BMPs be clear, specific and measurable, as does the Remand Rule for this permit. The additional notations on assessment of water quality are not appropriate.

27. Page 52 of 54 (Part IV(G) Annual Compliance Report): No change needed to this section if the permit years continue to be July 1 to June 30. Otherwise, please adjust the Annual Report due date to provide adequate time to prepare the Annual Report.

28. Below is a list of typographic errors that we identified in the 6/23/2020 Final Draft GP:

- a. Page 3 of 54, first paragraph: ‘foe’ should be changed to ‘for’
- b. Page 28 of 54, Part IV(C)(3)(e)(iv)(1): please add the word ‘**is**’ to the phrase, “*Sampling and analysis must include, but **is** not limited to:*”
  - i. We believe you meant item (b) to read: “*ammonia, total residual chlorine, temperature, **and** conductivity; **and***”
  - ii. For item (c), remove the comma after optical enhancers
- c. Page 29 of 54, Part IV(C)(3)(e)(vii): please add the word ‘**and**’ to the phrase, “*The permittee may rely on screening conducted under previous permits to the extent it meets the requirements in Part IV(C)(3)(e)(iv) **and** no new construction or redevelopment has occurred in the outfall drainage area since the screening.*”
- d. Page 30 of 54, Part IV(C)(3)(f), last paragraph: ‘it’ should be changed to ‘in,’ “*...the permittee must identify these wet weather outfalls **in** its written IDDE Plan...*”
- e. Page 47 of 54, Part IV(C)(6)(d)(6)(c) Visual Monitoring: Remove the repetitive words “must be conducted” in second line.
- f. Page 49 of 54, Part IV(C)(6)(d)(8)(c) Corrective Action Report, first paragraph, last sentence: delete period after “*...GP. triggers...*”

29. Will there be an opportunity to comment on the Fact sheet when it is issued?

Thank you again for the opportunity to comment on this draft of the MS4 General Permit.

Warm Regards,  
Integrated Environmental Engineering, Inc.  
Kristie Rabasca on behalf of:

- Interlocal Stormwater Working Group (ISWG)



Southern Maine Stormwater Working Group (SMSWG)

- Bangor Area Stormwater Working Group (BASWG)
- Androscoggin Valley Stormwater Working Group (AVSWG)
- Maine Department of Transportation (Maine DOT)
- Maine Turnpike Authority (MTA)
- Maine Water Environment Association (MEWEA)
- Maine Municipal Association (MMA)



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