

ENVIRONMENTAL
SERVICES



ENGINEERING
SERVICES

2019 ANNUAL REPORT

TOWN OF TOLLAND
21 TOLLAND GREEN
TOLLAND, CONNECTICUT

2017 MS4 GENERAL PERMIT
EXISTING PERMITTEE
PERMIT NUMBER GSM000100

FEBRUARY 2020

PREPARED FOR:

TOWN OF TOLLAND
21 TOLLAND GREEN
TOLLAND, CT 06084

PREPARED BY:

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INTRODUCTION

This Annual Report has been prepared for the Town of Tolland in compliance with the Connecticut Department of Energy & Environmental Protection (CT DEEP) General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4) (MS4 General Permit), effective July 1, 2017. This report documents the efforts of the Town of Tolland to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) for the period of January 1, 2019 to December 31, 2019.

The 2019 Annual Report for the Town of Tolland is presented on the following pages. As a note, under Status in each BMP Summary table, “In progress” means the BMP has yet to be completed, and “Ongoing” means the BMP has been completed and upkeep/maintenance of it continues.

PART I: SUMMARY OF MINIMUM CONTROL MEASURE ACTIVITIES

1. PUBLIC EDUCATION AND OUTREACH (Section 6 (a)(1) / page 19)

1.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
1-1 Implement public education and outreach	Ongoing	Stormwater Management Plan and past Annual Reports have been posted on Town website. Website has tips for stormwater pollution prevention with a link to US EPA website for more information. DPW website has been updated with phone numbers for stormwater concerns/emergencies	SWMP posted to website	Public Works	July 1, 2019	July 1, 2019	Copies of Stormwater Management Plan and MS4 General Permit are available at the offices of the Town Clerk, Public Works and Planning & Development
1-2 Address education/outreach for pollutants of concern	Ongoing	Same as above	SWMP posted to website	Public Works	July 1, 2019	July 1, 2019	None

1.2 DESCRIBE ANY PUBLIC EDUCATION AND OUTREACH ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

Town website will be further updated to include the following info:

- Link to current Annual Report
- Info regarding IDDE program will be posted to website. Once posted, a banner on website indicating new info will be added.

1.3 DETAILS OF ACTIVITIES IMPLEMENTED TO EDUCATE THE COMMUNITY ON STORMWATER

Program Element/Activity	Audience (and number of people reached)	Topic(s) covered	Pollutant of Concern addressed (if applicable)	Responsible dept. or partner org.
Hand-outs available at Planning & Development Office	General public	Rain gardens; Manure management	NA	Planning & Development

2. PUBLIC INVOLVEMENT/PARTICIPATION (Section 6(a)(2) / page 21)

2.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
2-1 Comply with public notice requirements for the Stormwater Management Plan	Complete	Stormwater Management Plan has been posted on Town website	SWMP posted to website	Public Works	April 3, 2017	April 3, 2017	None
2-1 Comply with public notice requirements for Annual Reports	Ongoing	Annual Report has been posted on Town website	Annual Report posted to website	Public Works	Feb. 15, 2019	Feb. 15, 2019	After posting, a banner was added to website indicating new info.

2.2 DESCRIBE ANY PUBLIC INVOLVEMENT/PARTICIPATION ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

Identify if any areas warrant a clean-up and coordinate such as necessary.

2.3 PUBLIC INVOLVEMENT/PARTICIPATION REPORTING METRICS

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	Yes	4/15/17	Town website
Availability of Annual Report announced to public	Yes	2/15/19	Town website

3. ILLICIT DISCHARGE DETECTION AND ELIMINATION (Section 6(a)(3) and Appendix B / page 22)

3.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
3-1 Develop written IDDE program	In progress	Town is in process of completing written IDDE program using the CT IDDE program template	Develop written IDDE program	Public Works	July 1, 2018	In progress	Once complete, program will be posted to Town website with a banner indicating new info added.
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	In progress	Stormwater drainage lines and outfalls mapping completed	Develop list and map	Planning & Development	July 1, 2019	In progress	Map of Priority Areas has been developed using NEMO MS4 mapping tool
3-3 Implement citizen reporting program	Ongoing	Public Works investigates suspected illicit discharges.	Citizen reports logged and investigated	Public Works	July 1, 2017	July 1, 2017	No reports made in 2019
3-4 Establish legal authority to prohibit illicit discharges	Complete	Ordinance enforcement	Illicit discharges investigated and remediated	Public Works	July 1, 2018	July 1, 2017	Copy of ordinance included in IDDE Program
3-5 Develop record keeping system for IDDE tracking	Complete	Systems in place and functioning properly	Illicit discharges investigated, logged, tracked and remediated	Public Works	July 1, 2017	July 1, 2017	No reports made in 2019
3-6 Address IDDE in areas with pollutants of concern	Ongoing	IDDE complaints investigated, logged and tracked	Illicit discharges investigated, logged, tracked and remediated	Public Works	Not specified	Ongoing	No reports made in 2019
3-7 Household hazardous waste collection	Ongoing	Participation in Household Hazardous Waste Collection Day with partner towns	Household hazardous waste collected and recycled/ disposed	Public Works	Annually	Annually	151 households participated

3.2 DESCRIBE ANY IDDE ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

The written IDDE program will be posted to the Town website and a link listed in next year's Annual Report. The written IDDE program will be updated as needed throughout the term of the General Permit.

A master IDDE tracking spreadsheet will be maintained, and all employees involved in the IDDE program will be trained regarding the logging process.

3.3 LIST OF CITIZEN REPORTS OF SUSPECTED ILLICIT DISCHARGES RECEIVED DURING THIS REPORTING PERIOD.

Date of Report	Location / suspected source	Response taken
None		

3.4 PROVIDE A RECORD OF ILLICIT DISCHARGES OCCURRING DURING THE REPORTING PERIOD AND SSOs OCCURRING JULY 2012 THROUGH END OF REPORTING PERIOD USING THE FOLLOWING TABLE.

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
None						

3.5 BRIEFLY DESCRIBE THE METHOD USED TO TRACK ILLICIT DISCHARGE REPORTS, RESPONSES TO THOSE REPORTS AND WHO WAS RESPONSIBLE FOR TRACKING THIS INFORMATION.

Reports of illicit discharges are received and investigated by the Department of Public Works. CMG Environmental is copied.

3.6 PROVIDE A SUMMARY OF ACTIONS TAKEN TO ADDRESS SEPTIC FAILURES USING THE TABLE BELOW.

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known
2 septic failures in Town in 2019	Both systems were replaced	Unknown

3.7 IDDE REPORTING METRICS

Metrics	
Estimated or actual number of MS4 outfalls	873
Estimated or actual number of interconnections	Unknown
Outfall mapping complete	100%
Interconnection mapping complete	0%
System-wide mapping complete (detailed MS4 infrastructure)	100%
Outfall assessment and priority ranking	0%
Dry weather screening of all High and Low priority outfalls complete	0%
Catchment investigations complete	10%
Estimated percentage of MS4 catchment area investigated	10%

3.8 BRIEFLY DESCRIBE THE IDDE TRAINING FOR EMPLOYEES INVOLVED IN CARRYING OUT IDDE TASKS INCLUDING WHAT TYPE OF TRAINING IS PROVIDED AND HOW OFTEN IS IT GIVEN (MINIMUM ONCE PER YEAR).

Annual training of Public Works and Parks Department employees on the following topics:

- MS4 General Permit
- SWMP and who has responsibility for implementation
- Discussion of IDDE, Post-Construction SW Management and Pollution Prevention / Good Housekeeping MCMs and what Town is required to do under each

4. CONSTRUCTION SITE RUNOFF CONTROL (Section 6(a)(4) / page 25)

4.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
4-1 Implement, upgrade and enforce land use regulations or other legal authority to meet requirements of MS4 General Permit	Ongoing	<ul style="list-style-type: none"> Review by consulting engineer for development that entails new drainage systems Pre-construction meetings of most projects requiring E&S Ongoing inspection tracking Inspections of 71 sites for E&S compliance - no stop work orders issued as all issues resolved thru voluntary compliance Tolland requires E&S for ½ acre or more of disturbance Enforcement of LID regulations Staff training 	Have clear, concise and enforceable regulations	Planning & Development; Planning & Zoning Commission; Inland Wetlands Commission	July 1, 2019	July 1, 2019	Pre-construction meetings have substantially reduced issues of non-compliance with E&S regulations. No formal violation notices or stop work orders were issued. Where issues were evident, department staff worked with contractor or land owner to rectify any issues.
4-2 Develop/implement plan for interdepartmental coordination in site plan review and approval	Ongoing	Ongoing interdepartmental coordination	Gather all relevant expertise during plan review and convey to applicant in a timely manner	Planning & Development	July 1, 2017	July 1, 2017	2 staff members, 2 commissions and consulting engineer responsible for reviewing some or all permits for land disturbances and stormwater discharge. Planning & Development is the lead entity. Director of Planning & Development refers applications to Consulting Engineer and Director of Public Works as needed. Comments are transmitted to applicant and, as necessary, the applicable commission. For larger projects, team meetings are held which may also include the Building Official, Fire Marshal, Director of Public Safety and others.

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
4-3 Review site plans for stormwater quality concerns	Ongoing	Per BMP 4-2, staff reviews all site plans with disturbance of ½ acre or more and all site plan, special permit, & wetland permit applications.	Ensure stormwater management is properly designed to avoid issues post-construction	Planning & Development	July 1, 2017	July 1, 2017	Consulting engineer reviews plans when required. See BMP 4-2.
4-4 Conduct site inspections	Ongoing	71 site inspections	Ensure compliance; identify potential problems before they worsen	Planning & Development	July 1, 2017	July 1, 2017	Site inspections for E&S compliance.
4-5 Implement procedure to allow public comment on site development	Ongoing	Public hearings with local land use commissions; applications posted to town website; website asks public to notify staff if questions about disturbances	Obtain information on issues from those who live near a site	Planning & Development	July 1, 2017	Most completed before July 1, 2017; web language was added Dec. 31, 2017	Web page for Zoning and Wetlands alerts public to contact staff if they have a question about land disturbances. Planning and Zoning and Wetlands Commissions received input related to drainage regarding development applications. Issues were addressed by applicants during approval process. In most cases, Consulting Engineer reviews drainage-related components of development applications and provides input to Commissions.
4-6 Implement procedure to notify developers about DEEP Construction Stormwater General Permit	Ongoing	Flyer added to website and posted in Planning & Development Office.	Ensure landowners understand their obligations	Planning & Development	July 1, 2017	Dec. 31, 2017	

4.2 DESCRIBE ANY CONSTRUCTION SITE RUNOFF CONTROL ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

E&S and stormwater requirements are found in multiple documents. Planning & Development has a Scope or Work from its consulting engineer to consolidate into one document for ease of use and implementation. Updates to zoning regulations and stormwater regulations in LID Manual should be finalized and adopted in near future.

5. POST-CONSTRUCTION STORMWATER MANAGEMENT (Section 6(a)(5) / page 27)

5.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning.	In progress	Initial discussions with town attorney regarding post-construction inspections of privately owned facilities.	Implement LID (completed); Determine post-construction inspection legal authority	Planning & Development	July 1, 2021	In progress	Town adopted LID regulations, with revisions to 2011. LID Manual updates in progress - see Section 4.2 above.
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects.	Ongoing	Begun examining new requirements.	Adopt updated regulations and ordinances to implement	Planning & Development; Town Council	July 1, 2019	July 1, 2019	As noted, Town has LID. LID Manual updates in progress - see Section 4.2 above.
5-3 Identify retention and detention ponds in priority areas.	Ongoing	Staff has mapped drainage basins.	Have an up-to-date map showing public and private drainage basins	Public Works; Planning & Development	July 1, 2019	July 1, 2019	Mapped drainage basins using air photos.
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures.	Ongoing		Develop and implement long-term maintenance plan.	Public Works	July 1, 2019	July 1, 2019	
5-5 DCIA mapping.	In progress	Town is in process of completing IDDE program including DCIA calculations.	Perform calculations and complete mapping.	Planning & Development	July 1, 2020	In progress	Map developed using NEMO MS4 mapping tool
5-6 Address post-construction issues in areas with pollutants of concern.	Ongoing		Post-construction issues will be identified and addressed.	Engineering; Planning & Development; Public Works	Not specified	Ongoing	

5.2 DESCRIBE ANY POST-CONSTRUCTION STORMWATER MANAGEMENT ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

Determine approach to post-construction inspections of private drainage facilities.

For new private drainage facilities, require a maintenance plan to be submitted and signed by applicant, providing Town with ability to conduct periodic inspections. Must be a separate document (i.e., not buried in notes on a plan).

Begin drafting any regulatory language that is needed to implement these requirements.

Finalize mapping of drainage facilities, determining which are public and which are private.

5.3 POST-CONSTRUCTION STORMWATER MANAGEMENT REPORTING METRICS

Metrics	
Baseline (2012) Directly Connected Impervious Area (DCIA)	Unknown # acres
DCIA disconnected (redevelopment plus retrofits)	0 acres this year / unknown # acres total
Retrofits completed	0
DCIA disconnected	0% this year / % total since 2012
Estimated cost of retrofits	\$0
Detention or retention ponds identified	# this year /# total

5.4 BRIEFLY DESCRIBE THE METHOD TO BE USED TO DETERMINE BASELINE DCIA.

Consultation of MS4 map on UConn NEMO website.

6. POLLUTION PREVENTION/GOOD HOUSEKEEPING (Section 6(a)(6) / page 31)

6.1 BMP SUMMARY

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
6-1 Develop/implement formal employee training program.	In progress	Training program has been established and implemented	Training performed	Public Works	July 1, 2017	In progress	
6-2 Implement MS4 property and operations maintenance.	Ongoing	Town optimizes fertilizer application, properly manages grass clippings and leaves and buildings, vehicles and equipment are properly maintained	Continued program implementation	Public Works	July 1, 2018	July 1, 2018	
6-3 Implement coordination with interconnected MS4s.	In progress		Town will coordinate with interconnected MS4s as necessary	Public Works	Not specified	In progress	
6-4 Develop/implement program to control other sources of pollutants to the MS4.	In progress		Program will be developed and implemented as necessary	Public Works	Not specified	In progress	
6-5 Evaluate additional measures for discharges to impaired waters.	In progress		Discharges will be evaluated as necessary	Public Works	Not specified	In progress	
6-6 Track projects that disconnect DCIA.	In progress	No known disconnections in 2019	Projects will be tracked	Public Works; Planning & Development	July 1, 2017	In progress	Will be working with consulting engineer to set up a tracking spreadsheet
6-7 Implement infrastructure repair/rehab program.	Ongoing		Program will continue to be implemented	Public Works	July 1, 2021	July 1, 2017	150 catch basins repaired, 1 swale cleaned
6-8 Develop/implement plan to identify/prioritize retrofit projects.	In progress		Projects will be identified and prioritized	Public Works	July 1, 2020	In progress	

BMP	Status	Activities in current reporting period	Measurable goal	Department responsible	Due	Completion date	Additional details
6-9 Implement retrofit projects to disconnect 2% of DCIA.	In progress		Projects will be implemented	Public Works	July 1, 2022	In progress	
6-10 Develop/implement street sweeping program.	Ongoing	Streets and parking lots in Priority Areas are inspected annually and swept as needed	Program will continue to be implemented	Public Works	July 1, 2017	July 1, 2017	Minimal sweeping of Town streets required in 2019
6-11 Develop/implement catch basin cleaning program.	Ongoing	Catch basins routinely inspected and cleaned as necessary	Program will continue to be implemented	Public Works	July 1, 2020	July 1, 2017	Approx. 160 catch basins cleaned. Roadside leaf cleanup conducted to ensure unimpeded SW flow
6-12 Develop/implement snow management practices.	Ongoing	Snow and de-icing agents are properly managed	Program will continue to be implemented	Public Works	July 1, 2018	July 1, 2018	

6.2 DESCRIBE ANY POLLUTION PREVENTION/GOOD HOUSEKEEPING ACTIVITIES PLANNED FOR THE NEXT YEAR, IF APPLICABLE.

None other than continuation of those listed above.

6.3 POLLUTION PREVENTION/ GOOD HOUSEKEEPING REPORTING METRICS

Metrics	
Employee training provided for key staff	April 2019
Street sweeping	
Curb miles swept	<10
Volume (or mass) of material collected	20
Catch basin cleaning	
Total catch basins in priority areas	
Total catch basins in MS4	
Catch basins inspected	160
Catch basins cleaned	160
Volume (or mass) of material removed from all catch basins	40 cy
Volume removed from catch basins to impaired waters (if known)	0 tons
Snow management	
Type(s) of deicing material used	MgCl ₂ treated salt
Total amount of each deicing material applied	2,700 tons
Type(s) of deicing equipment used	Truck spreaders
Lane-miles treated	123 miles
Snow disposal location	Right of way
Staff training provided on application methods & equipment	Oct. 2019
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	lbs or %
Reduction in turf area (since start of permit)	acres
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	\$

6.4 CATCH BASIN CLEANING PROGRAM

Briefly describe the method used to optimize your catch basin inspection and cleaning schedule. [Complete this section for the 2017 Annual Report only]
Visual inspection as part of road maintenance program. Cleaning on an as-needed basis. Removed material disposed of at Manchester Landfill.

6.5 RETROFIT PROGRAM

Briefly describe the Retrofit Program identification and prioritization process, the projects selected for implementation, the rationale for the selection of those projects and the total DCIA to be disconnected upon completion of each project. [Provide information if available in 2017 report. Section to be completed for the 2019 Annual Report.]

Information not available.

Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection in future years. [Provide information if available in 2017 report. Section to be completed for the 2019 Annual Report.]

Information not available.

Describe plans for continuing the Retrofit program beyond this permit term with the goal to disconnect 1% DCIA annually over the next 5 years. [Provide information if available in 2017 report. Section to be completed for the 2019 Annual Report.]

Information not available.

PART II: IMPAIRED WATERS INVESTIGATION AND MONITORING

[This section required beginning with 2018 Annual Report]

1. IMPAIRED WATERS INVESTIGATION AND MONITORING PROGRAM

1.1 INDICATE WHICH STORMWATER POLLUTANT(S) OF CONCERN OCCUR(S) IN YOUR MUNICIPALITY OR INSTITUTION. This data is available on the MS4 map viewer: <http://s.uconn.edu/ctms4map>.

Nitrogen/Phosphorus ☐ Bacteria ☒ Mercury ☐ Other Pollutant of Concern ☐

1.2 DESCRIBE PROGRAM STATUS.

Discuss 1) the status of monitoring work completed, 2) a summary of the results and any notable findings, and 3) any changes to the Stormwater Management Plan based on monitoring results.

IDDE Program under development.

2. SCREENING DATA FOR OUTFALLS TO IMPAIRED WATERBODIES (Section 6(i)(1) / page 41)

2.1 SCREENING DATA COLLECTED UNDER 2017 GENERAL PERMIT

Complete the table below for any outfalls screened during the reporting period. Each Annual Report will add on to the previous year's screening data showing a cumulative list of outfall screening data.

Outfall ID	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
NA					

2.2 CREDIT FOR SCREENING DATA COLLECTED UNDER 2004 GENERAL PERMIT

If any outfalls to impaired waters were sampled under the 2004 MS4 General Permit, that data can count towards the monitoring requirements under the modified 2017 MS4 General Permit. Complete the table below to record sampling data for any outfalls to impaired waters under the 2004 General Permit.

Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
NA					

3. FOLLOW-UP INVESTIGATIONS (Section 6(i)(1)(D) / page 43)

Provide the following information for outfalls exceeding the pollutant threshold.

Outfall	Status of drainage area investigation	Control measure implementation to address impairment
NA		

4. PRIORITIZED OUTFALL MONITORING (Section 6(i)(1)(D) / page 43)

Once outfall screening has been completed for at least 50% of outfalls to impaired waters, identify 6 of the highest contributors of any pollutants of concern. Begin monitoring these outfalls on an annual basis by July 1, 2020.

Outfall	Sample Date	Parameter(s)	Results	Name of Laboratory (if used)
NA				

PART III: ADDITIONAL IDDE PROGRAM DATA [This section required beginning with 2018 Annual Report]

1. ASSESSMENT AND PRIORITY RANKING OF CATCHMENTS DATA (Appendix B (A)(7)(c) / page 5)

Provide a list of all catchments with ranking results (DEEP basins may be used instead of manual catchment delineations).

1. Catchment ID (DEEP Basin ID)	2. Category	3. Rank

2. OUTFALL AND INTERCONNECTION SCREENING AND SAMPLING DATA (Appendix B (A)(7)(d) / page 7)

2.1 DRY WEATHER SCREENING AND SAMPLING DATA FROM OUTFALLS AND INTERCONNECTIONS

Provide sample data for outfalls where flow is observed. Only include Pollutant of concern data for outfalls that discharge into stormwater impaired waterbodies.

Outfall / Interconnection ID	Screening / sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or enterococcus	Surfactants	Water Temp	Pollutant of concern	If required, follow-up actions taken

2.2 WET WEATHER SAMPLE AND INSPECTION DATA

Provide sample data for outfalls and key junction manholes of any catchment area with at least one System Vulnerability Factor.

Outfall / Interconnection ID	Sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or Enterococcus	Surfactants	Water Temp	Pollutant of concern

3. CATCHMENT INVESTIGATION DATA (Appendix B (A)(7)(e) / page 9)

3.1 SYSTEM VULNERABILITY FACTOR SUMMARY

For those catchments being investigated for illicit discharges (i.e. categorized as high priority, low priority, or problem) document the presence or absence of System Vulnerability Factors (SVF). If present, report which SVFs were identified.

Outfall ID	Receiving Water	System Vulnerability Factors

Where SVFs are:

1. History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages.
2. Sewer pump/lift stations, siphons, or known sanitary sewer restrictions where power/equipment failures or blockages could readily result in SSOs.
3. Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints.
4. Common or twin-invert manholes serving storm and sanitary sewer alignments.
5. Common trench construction serving both storm and sanitary sewer alignments.
6. Crossings of storm and sanitary sewer alignments.
7. Sanitary sewer alignments known or suspected to have been constructed with an underdrain system;
8. Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken, or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations.
9. Areas formerly served by combined sewer systems.
10. Any sanitary sewer and storm drain infrastructure greater than 40 years old in medium and densely developed areas.

11. Widespread code-required septic system upgrades required at property transfers (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).
12. History of multiple local health department or sanitarian actions addressing widespread septic system failures (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).

3.2 KEY JUNCTION MANHOLE DRY WEATHER SCREENING AND SAMPLING DATA

Key Junction Manhole ID	Screening / Sample date	Visual/ olfactory evidence of illicit discharge	Ammonia	Chlorine	Surfactants

3.3 WET WEATHER INVESTIGATION OUTFALL SAMPLING DATA

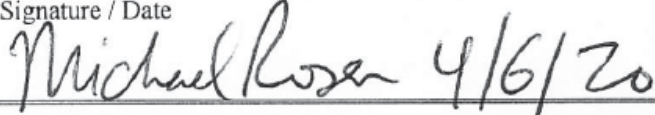
Outfall ID	Sample date	Ammonia	Chlorine	Surfactants

3.4 DATA FOR EACH ILLICIT DISCHARGE SOURCE CONFIRMED THROUGH THE CATCHMENT INVESTIGATION PROCEDURE

Discharge location	Source location	Discharge description	Method of discovery	Date of discovery	Date of elimination	Mitigation or enforcement action	Estimated volume of flow removed

PART IV: CERTIFICATION

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in this document or its attachments may be punishable as a criminal offense, in accordance with Section 22a-6 of the Connecticut General Statutes, pursuant to Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute."

Chief Elected Official or Principal Executive Officer:	Document Prepared by:
Print name	Print name
Michael Rosen, Town Manager	Matthew Reiser, CMG Environmental, Inc.
Signature / Date  4/6/20	Signature / Date  3/31/20