MS4 General Permit Carl Robinson Correctional Institution 2022 Annual Report GSM000124

January 1, 2022 – December 31, 2022 Primary MS4 Contact: Rich Pease, Environmental Analyst, 860-692-7562, rich.pease@ct.gov

This report documents the Carl Robinson Correctional Institution efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2022 to December 31, 2022.

Progress in 2022 was limited by the Governor's COVID-19 Stay at Home Executive Order and the pandemic did impact our ability to make progress on certain items listed as in progress or on-going. Despite the pandemic, there is progress to report. Notable accomplishments include roll-out of staff training programs, documentation of a street sweeping program, and development of a Preventative Maintenance catch basin cleaning program.

Part I: Summary of Minimum Control Measure Activities

1. Public Education and Outreach (Section 6 (a)(1) / page 19)

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due :	Date completed or projected completion date	Additional details
1-1 Implement public education and outreach	Not started/on- going		Develop/acquire materials One message per year and topic area	CT DOC Facilities Management and Engineering	Jul 1, 2019		UConn website EPA Stormwater Outreach Tool Box Rhode Island Stormwater Solutions
1-2 Address education/ outreach for pollutants of concern	NA	NA					No Direct Discharges to Impaired Waters

1.2 Describe any Public Education and Outreach activities planned for the next year, if applicable.

CT DOC will acquire educational materials to be used during the permit term from available sources such as CTDEEP, NEMO, EPA, COG. Materials will be posted, distributed, or otherwise disseminated in a manner to reach all staff and inmates.

1.3 Details of activities implemented to educate the community on stormwater

CT DOC will acquire educational materials to be used during the permit term from available sources such as CTDEEP, NEMO, EPA, COG. Materials will be posted, distributed, or otherwise disseminated in a manner to reach all staff and inmates.

2. Public Involvement/Participation (Section 6 (a)(2) / page 21)

2.1 BMP Summary

вмР	Status	Activitles in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details,
2-1 Comply with public notice requirements for the Stormwater Management Plan	Complete	Public notice posted on internet web page	Public notice for SMP	CT DOC Facilities Management and Engineering	Ongoing	Apr 3, 2017	
2-2 Comply with public notice requirements for Annual Reports	Complete	Public notice posted on internet web page	Public notice for Annual Report	CT DOC Facilities Management and Engineering	Feb 15, 2019	Feb 15, 2020 Draft April 1, 2020 Final	

2.2 Describe any Public Involvement/Participation activities planned for the next year, if applicable.

Continue to make the SMP available on-line and at a location for public review.

Continue to make the annual report available on-line and at a location for public review.

Continue to comply with Annual Report public notice requirements.

2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	Y	4/3/17	24 Wolcott Hill Rd, Wethersfield http://www.ct.gov/ doc/cwp/view.asp? a=1502&Q=591480
Availability of Annual Report announced to public	Υ	4/1/20	24 Wolcott Hill Rd, Wethersfield http://www.ct.gov/ doc/cwp/view.asp? a=1502&Q=591480

3. Illicit Discharge Detection and Elimination (Section 6(a)(3) and Appendix B / page 22)

BMP	Status	Activities in current reporting period	Measurable goal	Department/Person Responsible	Due :	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	Complete	GZA has prepared a comprehensive written Illicit Discharge Detection and Elimination (IDDE) Program applicable to the locations and areas classified as Priority Areas in the SMP. The written IDDE Program will include procedures and schedules for development and implementation of the following components: • Legal Authority to prohibit and eliminate illicit discharges • Statement of IDDE Program Responsibilities • Assessment and Priority Ranking of Catchments • Outfall and Interconnection Screening and Sampling o Sample collection, use of field kits, storage/conveyance of samples, hold times, etc.	Written IDDE Program	CT DOC Facilities Management and Engineering	Jul 1, 2019	6/8/18	Template posted on UConn website

						1		
		o Develop a schedule and parameters for	1					
		outfall and interconnection screening and	1					
		sampling to begin 10/1/19						
		o Develop a schedule and parameters for dry						
		weather screening and sampling of every						
		outfall and interconnection						
		over the five-year permit term						
		Catchment Investigations						
		IDDE/SSO Removal and Confirmation						
		Follow-up Screening			İ			
perpendicular and analysis analysis and analysis analysis and analysis analysis and analysis analysis and analysis analysis and analysis analysis analysis analysis analysis a		Illicit Discharge Prevention Procedures				4-6-3-4-		
3-2 Develop list	Complete	GZA has developed a comprehensive list (in	List and	CT DOC Facilities	Jul 1,	12/29/17		
and maps of all		Microsoft Excel format) and maps (min	Maps of	Management and	2020			
MS4		1"=2000', max	Outfalls	Engineering				
stormwater		1"=100') of stormwater discharge (outfall)						
outfalls in		locations and interconnections utilizing						
priority areas		available DOC facility drainage maps.						
p.,,,,,,, a. cac		Maps which are available in paper only						
		(Bridgeport, Carl Robinson, MacDougall, and						
		Osborn) will be scanned by GZA						
		and locations of outfalls and interconnections				ļ		
		digitized using ArcGIS. Latitude/longitude						
]			
		will be identified using ArcGIS.						
		The maps and listing include the following						
		information:						
		Type, material, size, and location (latitude)			70 A A A A A A A A A A A A A A A A A A A	·		
		and longitude) of conveyance, outfall, or						
		channelized flow,						
		 Name, water body ID and Surface Water 						
		Quality Classification of the immediate						
		surface water body or wetland						
		to which the outfall eventually discharges,			İ			i
		• If the outfall does not discharge directly to a					•	
		named water body, the name and water body						
		ID of the nearest						Ì
		named water body to which the outfall						
		eventually discharges, and			•			
1				-				
		• The name of the watershed, including the						
		sub regional drainage basin number in which						İ
		the discharge is located.						
		Building upon the list and mapping GZA will						
STATE OF THE PROPERTY AND THE PROPERTY A		conduct field investigations to confirm outfall						
Parameter state of		and interconnection locations identified on						
P S S S S S S S S S S S S S S S S S S S		the available mapping, and to potentially						
	-	identify outfall locations not previously						

		mapped. To the extent practical, the outfall mapping investigations will be performed in parallel with field screening investigations of each outfall and interconnection to confirm/identify the following information: Unique identifier, Receiving water, Outfall type, Date of most recent inspection, Dimensions/size, Shape, Material, Spatial location (latitude, longitude), Physical condition, and Indicators of potential non-stormwater discharges.				
3-3 Implement citizen reporting program	In progress	The Citizen Reporting Program has been outlined in the IDDE Plan prepared by GZA. Started development of procedure	Posting of program information, Number of reports, illicit discharges identified and corrected	CT DOC Facilities Management and Engineering	Jul 1, 2019	Website, email, phone number
3-4 Establish legal authority to prohibit illicit discharges	In progress	Establishing Legal Authority has been outlined in the IDDE Plan prepared by GZA. Started development of procedure	Establish written procedures	CT DOC Facilities Management and Engineering	Jul 1, 2019	Checklist and sample ordinance posted on UConn website
3-5 Develop record keeping system for IDDE tracking	In progress	The IDDE Tracking Recordkeeping System has been outlined in the IDDE Plan prepared by GZA. Started development of procedure	Number of illicit discharges removed	CT DOC Facilities Management and Engineering	Jul 1, 2019	
3-6 Address IDDE in areas with pollutants of concern	NA .	NA			Not specified	

Extra space for describing above BMP activities, if needed:

ВМР	
3-1, 3-4	The IDDE Program is designed to provide the legal authority to prohibit and eliminate illicit discharges and sanitary sewer overflows to the MS4; find
	the source of any illicit discharges; eliminate those illicit discharges; and ensure ongoing screening and tracking to prevent and/or eliminate future
	illicit discharges. The DOC MS4 is limited to DOC properties. As such, DOC has full authority to prohibit, investigate, and remove illicit discharges from
	its MS4 properties, and to enforce its own policy. Therefore, separate legal authority is not required.

3.2 Describe any IDDE activities planned for the next year, if applicable.

Finalize citizen reporting program. Finalize legal authority.

Finalize record keeping system.

3.3 List of citizen reports of suspected illicit discharges received during this reporting period.

Date of Report	Location / suspected source	R	tesponse taken
NA	NA	N	NA .
	•		

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	Date and duration of	Discharge to MS4 or	Estimated volume	Known or suspected cause	Corrective measures planned dates)	and completed (include	Sampling data ((Fapplicable)
crossing /address and receiving water)	occurrence	surface water	discharged	/Responsible party		5). Discontinuo	
None Reported	None Reported	-					

3.5 Briefly describe the method used to track illicit discharge reports, responses to those reports, and who was responsible for tracking this information.

As part of the comprehensive, Final IDDE Plan prepared by GZA, we will develop a spreadsheet-based system for maintaining records of illicit discharge abatement activities.

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
NA .		
		A STATE OF THE PROPERTY OF THE

3.7 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	5
Estimated or actual number of interconnections	0
Outfall mapping complete	100%
Interconnection mapping complete	100%
System-wide mapping complete (detailed MS4 infrastructure)	100%
Outfall assessment and priority ranking	100%
Dry weather screening of all High and Low priority outfalls complete	5
Catchment investigations complete	Planned for 2026 (low priority)
Estimated percentage of MS4 catchment area investigated	Planned for 2026 (low priority)

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 IDDE training is available to all employees. The training has been incorporated into the on-line Waste Materials and Spill Reporting and Handling, Storage and Disposal of Waste Materials training programs.

4. Construction Site Runoff Control (Section 6(a)(4) / page 25)

вмР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date:completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MS4 general permit	In progress	Requirements for implementation have been outlined in the SMP prepared by GZA Started development of procedure	Establish written procedures	CT DOC Facilities Management and Engineering	Jul 1, 2020		
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	In progress	Requirements for implementation have been outlined in the SMP prepared by GZA Started development of procedure	Written interdepartmental coordination procedures	CT DOC Facilities Management and Engineering	Jul 1, 2017		
4-3 Review site plans for stormwater quality concerns	Complete	No site plan reviews during report year	Number of site plan reviews Procedure developed	CT DOC Facilities Management and Engineering	Jul 1, 2017	12/31/17	
4-4 Conduct site inspections	Complete	No construction developments during the report year	Number of site inspections Procedure/Checklist developed	CT DOC Facilities Management and Engineering	Jul 1, 2017	12/31/17	
4-5 Implement procedure to allow public comment on site development	NA	DOC operations are located entirely on state property. As such, DOC will follow the public comment requirements of State Statutes and DEEP permits and regulations. Information submitted by the public with regard to proposed/ongoing site development/disturbance activities will be considered.					
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	In progress	No construction or site development projects during the report year	Established policy Number of projects CGP	CT DOC Facilities Management and Engineering	Jul 1, 2017		

4.2 Describe any Construction Site Runoff Control activities planned for the next year, if applicable.

Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MS4 general permit. Finalize procedure for interdepartmental coordination in site plan review and approval.

Using Town of Tolland State Permit Notification as a model, finalize a procedure to notify developers about DEEP construction stormwater permit.

5. Post-construction Stormwater Management (Section 6(a)(5) / page 27)

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due.	Date completed or projected completion date	Additional details:
*5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	Not started	Began to gather available guidance documents from DEEPs website: CT Guidelines for Soil Erosion and Sediment Control. Technical Memorandum 4, LID Guidelines and Standards (Fuss & O'Neill 2010). LID Appendix to CT Guidelines for Soil Erosion and Sediment Control (Fuss & O'Neill 2011). LID Appendix to the CT Stormwater Quality Manual (Fuss & O'Neill 2011).	Establish written protocols Number of project reviewed	CT DOC Facilities Management and Engineering	Jul 1, 2022		As the CT DOC MS4 is limited to CT DOC property, CT DOC already has full authority to control development procedures and implement the use of "Low Impact Development" (LID) and runoff reduction site planning and development practices, provided all such development and redevelopment is planned, designed, and constructed in accordance with other applicable regulatory requirements and to meet public safety and security needs.
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	-	NA See MCM 5-1			Jul 1, 2022		

5-3 Identify retention and detention ponds in priority areas	Complete	Retention and detention ponds were identified by GZA through field investigations and system mapping	Retention and detention ponds identified through field investigations and system mapping	CT DOC Facilities Management and Engineering	Jul 1, 2020	12/29/17	
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	Complete	GZA has developed long term maintenance plans for ensuring the effectiveness of retention or detention ponds and applicable stormwater treatment structures or measures that are located within Priority Areas	Establish Written long- term maintenance plans and begin implementation. Track annual inspections including structures inspected, date, inspection results, and maintenance performed.	CT DOC Facilities Management and Engineering	Jul 1, 2020	4/5/18	
5-5 DCIA calculations	Complete	Established written methodology in SMP and performed initial DCIA calculations	Established Written methodology in SMP and performed initial DCIA calculations.	CT DOC Facilities Management and Engineering	Jul 1, 2020	12/15/17	
5-6 Address post-construction issues in areas with pollutants of concern	NA				Not specified		

5.2 Describe any Post-Construction Stormwater Management activities planned for the next year, if applicable.

Currently there is no construction occurring on site and no plan of construction in the future.	
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5.3 Post-Construction Stormwater Management reporting metrics

Metrics	
Baseline (2017) Directly Connected Impervious Area (DCIA)	12.31 acres
DCIA disconnected (redevelopment plus retrofits)	*
Retrofits completed	Covered under MCM 6
DCIA disconnected	*
Estimated cost of retrofits	Covered under MCM 6
Detention or retention ponds identified	1

*CT DOC has had discussions with CT DEEP regarding specific BMPs within this MCM and discussed unacceptable safety and security risks which could arise from compliance with several of the BMPs identified namely, the following:

- Legal Authority/Guidelines for LID/Runoff Reduction;
- Enforce LID/runoff reduction requirements for development and redevelopment projects;
- The requirement to specify minimal dimensional criteria for creation of roadways, parking lots, and other impervious cover and minimize impervious areas;
- The requirements for disconnection of impervious surfaces, specifically goals for disconnection of impervious surfaces.

Certain BMPs and measurable goals may not be met by CT DOC based on agreed upon elements previously discussed with CT DEEP and the safety and security of the facilities.

Due to the security of the facilities and safety of the public, the retrofit program and goals to disconnect existing DCIA through retrofit and redevelopment projects will be difficult to implement. Retrofit and redevelopment projects and goals to modify existing developed sites will not be possible for DOC. To the extent possible, new development/redevelopment will consider DCIA. CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.

5.4 Briefly describe the method to be used to determine baseline DCIA.

CT DOC intends to use the methodology and criteria provided by CT DEEP for its preliminary calculations, which will be completed by July 1, 2020. The Impervious Surface Analysis Tool (ISAT), which is a Geographic Information System (GIS) extension, will be used to estimate impervious surface area using land cover and coefficients which are tied to the land cover dataset. The coefficients will

be used with the Connecticut Land Cover 2002 data available online. The tool is used to calculate the percent of impervious surface area of a selected geographic area (in this case, on a catchment basis). ISAT was developed by NEMO (Nonpoint Education for Municipal Officials) and the National Oceanic and Atmospheric Administration (NOAA) Coastal Services Center. This tool will be used for each catchment to an MS4 outfall. The CT DEEP criteria offered two options for calculating DCIA from impervious cover percentages. Review of these two options suggested that Option 1 was more appropriate at the time of SMP development, based on the limited information available. The Option 1 equation is as follows and will be used for each outfall and associated catchment area, where IC is the abbreviation for Impervious Cover:

$$0.1 \times (IC\%)^{1.5} = \% DCIA$$

The above-described method will be used for initial calculations, although CT DOC may revisit the method at a later date or refine the data.

6. Pollution Prevention/Good Housekeeping (Section 6(a)(6) / page 31)

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due s	Date completed or projected completion date	Additional details
6-1 Develop/implement formal employee training program	Complete/on- going	Training program developed	Number of staff trained annually	CT DOC Facilities Management and Engineering	Jul 1, 2019		The training has been incorporated into other currently available on-line training (hazardous waste).
6-2 Implement MS4	Complete	Adopted DEEP BMPs for grass clippings, mowing techniques, fertilizer application, and watering practices Completed procedure for geese management.	Written plan Quantities of chemicals and leaves, number of floor drains,	CT DOC Facilities Management and Engineering		2/5/18	
property and operations maintenance		Adopted DEEP BMPs for grass clippings, mowing techniques, fertilizer application, and watering practices	vehicles, etc.		Jul 1, 2018	2/5/18	
		Adopted DPH BMPs for dumpsters. Included SMP for York aquifer protection area.					

		Adopted DEEP guidance for vehicles and equipment. Adopted DEEP BMPs for fueling stations. Comply with vehicle maintenance wastewater discharge General Permit requirements. Addressed the outside washing of vehicles. Leaves are blown into nearby wooded areas.					
6-3 Implement coordination with interconnected MS4s	Complete	Registration copies provided to Town of Cheshire, Town of East Lyme, MDC (Hartford). Letter to Town of East Lyme included notification of SMP.	Transmit information to MS4s # of communication per year	CT DOC Facilities Management and Engineering	Not specified	4/3/17	
6-4 Develop/implement program to control other sources of pollutants to the MS4	In progress	Started development of procedure	Plan developed Number of sources, number of contacted sources	CT DOC Facilities Management and Engineering	Not specified		
6-5 Evaluate additional measures for discharges to impaired waters	Complete	No discharges to impaired waters	NA	CT DOC Facilities Management and Engineering	Not specified	7/21/17	
6-6 Track projects that disconnect DCIA	NA	Due to the security of the facilities and safety of the public, the retrofit program and goals to disconnect existing DCIA through retrofit and redevelopment projects will be difficult to implement. Retrofit and redevelopment projects and goals to modify existing developed sites will not be possible for DOC. To the extent possible, new development/redevelopment will consider DCIA. CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there			Jul 1, 2017		

		are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.				
6-7 Develop/Implement infrastructure repair/rehab program	In progress	Started development of procedure	Number of sites identified	CT DOC Facilities Management and Engineering	Jul 1, 2021	
6-8 Develop/implement plan to identify/prioritize retrofit projects	NA	Due to the security of the facilities and safety of the public, the retrofit program and goals to disconnect existing DCIA through retrofit and redevelopment projects will be difficult to implement. Retrofit and redevelopment projects and goals to modify existing developed sites will not be possible for DOC. To the extent possible, new development/redevelopment will consider DCIA. CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.			Jul 1, 2020	

6-9 Implement retrofit projects to disconnect	NA	Due to the security of the facilities and safety of the public, the retrofit program and goals to disconnect existing DCIA through retrofit and redevelopment projects will be difficult to implement. Retrofit and redevelopment projects and goals to modify existing developed sites will not be possible for DOC. To the extent possible, new development/redevelopment will consider DCIA. CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there			Jul 1, 2022	
2% of DCIA		are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.				
6-10 Develop/implement street sweeping program	Complete/on-going	Only salt is used for de-icing therefore there is very little debris on roads since there is no sand used. Because of this, the street sweeping program will consist of periodic inspections and sweeping as needed. Outside Grounds staff together with inmate work crews perform sweeping with hand and power brooms.	Written procedures	CT DOC Facilities Management and Engineering	Jui 1, 2018	
6-11 Develop/implement catch basin cleaning program	Complete/on- going	CT DOC has developed and will implement a preventative maintenance schedule for routine cleaning of catch basins such that no catch basin sump will be more than 50% full when cleaned. CT DOC will	Plan/schedule for CB inspection/cleaning	CT DOC Facilities Management and Engineering	Jul 1, 2020	

		utilize private contractors for catch basin cleaning which will take place in the Spring (usually April) following the cessation of winter maintenance activities (i.e. sanding, deicing, etc.).					
6-12 Develop/implement snow management practices	Complete/on- going	In addition to DOC policies, adopted DEEP BMPs for snow disposal and CT DOT Winter Highway Maintenance Operations guidance.	Written Plan Amount of deicing chemicals/sand, # of personnel trained, number of lane-miles treated	CT DOC Facilities Management and Engineering	Jul 1, 2018	2/5/18	

6.2 Describe any Pollution Prevention/Good Housekeeping activities planned for the next year, if applicable.

Formalize leaf management procedure.

Formalize program to control other sources of pollutants to the MS4.

Develop/implement infrastructure repair/rehab procedure.

6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	and Salah was
Employee training provided for key staff	Complete/on-going
Street sweeping	Complete/on-going
Curb miles swept	
Volume (or mass) of material collected	
Catch basin cleaning	Complete/on-going
Total catch basins in priority areas	68
Total catch basins in MS4	68
Catch basins inspected	
Catch basins cleaned	
Volume (or mass) of material removed from all catch basins	
Volume removed from catch basins to impaired waters (if known)	No impaired waters
Snow management	On-going
Type(s) of deicing material used	Salt/sand mix,
	FIRESTORM MAG
	CHLORIDE Ice Melt

Total amount of each deicing material applied	Sand/salt mix 168 tons (Enfield/Somers Complex) FIRESTORM MAG CHLORIDE 200 bags
	(50 lbs/bag)
Type(s) of deicing equipment used	
Lane-miles treated	Lane miles are tracked through vehicle mileage sheets and snow reports.
Snow disposal location	NA .
Staff training provided on application methods & equipment	Staff receive training on the operation of all appropriate equipment.
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	NA
Reduction in turf area (since start of permit)	NA
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	NA.
Cost of mitigation actions/retrofits	NA

6.4 Catch basin cleaning program Provide any updates or modifications to your catch basin cleaning program.

CT DOC will prioritize inspection and maintenance of catch basins located near construction activities and clean these structures more often if inspection and maintenance indicate excessive loadings. CT DOC has developed and will implement a preventative maintenance schedule for routine cleaning of catch basins such that no catch basin sump will be more than 50% full when cleaned. CT DOC will utilize private contractors for catch basin cleaning which will take place in the Spring (usually April) following the cessation of winter maintenance activities (i.e. sanding, deicing, etc.). Disposal of catch basin cleanings will be in accordance with applicable policies, guidance, and regulations. CT DOC has adopted CT DEEP's guideline entitled "Guideline for Municipal Management Practices for Street Sweepings & Catch Basin Cleanings".

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 2018 report. Section to be completed for the 2019 Annual Report.

Due to the security of the facilities and safety of the public, the retrofit program and goals to disconnect existing DCIA through retrofit and redevelopment projects will be difficult to implement. Retrofit and redevelopment projects and goals to modify existing developed sites will not be possible for DOC. To the extent possible, new development/redevelopment will consider DCIA.

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 2018 report.

Section to be completed for the 2019 Annual Report.

CT DOC has had discussions with CT DEEP regarding specific BMPs within this MCM and discussed unacceptable safety and security risks which could arise from compliance with several of the BMPs. It was agreed that there would be public safety and security concerns if this is something that DOC is required to implement. The retrofit program is a goal to disconnect DCIA areas each year. The security of the facilities and safety of the public can be reasons that preclude reaching this goal. To the extent possible, new development/redevelopment will consider DCIA.

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 2018 report. Section to be completed for the 2019 Annual Report.

CT DOC has had discussions with CT DEEP regarding specific BMPs within this MCM and discussed unacceptable safety and security risks which could arise from compliance with several of the BMPs. It was agreed that there would be public safety and security concerns if this is something that DOC is required to implement. The retrofit program is a goal to disconnect DCIA areas each year. The security of the facilities and safety of the public can be reasons that preclude reaching this goal. To the extent possible, new development/redevelopment will consider DCIA.

Part II: Impaired waters investigation and monitoring NA, No discharges to impaired waters.

1. Impai	ired wat	ers investigation	and monito	ring program		
1.1 Indicate v			oncern occur(s) in	your municipality or	nstitution. This data is available on the MS4 map vi	ewer:
Nitr	ogen/ Phos	ohorus 🗌 Bacteria 📗	Mercury	Other Pollutant o	Concern	
1.2 Describe	program st	atus				
		oring work completed, 2) a n based on monitoring rest		esults and any notable fli	dings, and 3) any changes to the	
NA, no discharg	ges to impa	ired waters.				
				•		
nego anno anno anno anno anno anno anno an						
2. Screer	ning data	for outfalls to in	npaired wate	erbodies (Sectio	n 6(i)(1) / page 41)	
2.1 Screening	data NA, n	no discharges to impaire	ed waters.			
		ow for any outfalls screest of outfall screening d	_	reporting period. Eac	n Annual Report will add on to the previous year'	s screening data
Outfall ID	Sample	Parameter (Nitrogen, Phosphorus, Bacteria,	Results	Name of Laboratory (if	Follow-up required?	

3. Follow-up investigations (Section 6(i)(1)(D) / page 43) NA, no discharges to impaired waters.

or Other pollutant of

concern)

Provide the following information for outfalls exceeding the pollutant threshold.

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

4. Prioritized outfall monitoring (Section 6(i)(1)(D) / page 43) NA, no discharges to impaired waters.

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, 2021.

Outfall Sample Date	Parameter(s) Results Name of Laboratory, (if used)	e, w.o.,
AND AND AND AND AND AND AND AND AND AND		

Part III: Additional IDDE Program Data

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
CR-0-1	Catchment/Outfall	Low
CR-0-2	Catchment/Outfall	Low
CR-0-3	Catchment/Outfall	Low
CR-0-5	Catchment/Outfall	Low
CR-0-6	Catchment/Outfall	Low

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
CR-0-1	6/29/17								·	No flow observed
CR-0-2	6/29/17			·						No flow observed
CR-0-3	6/29/17									No flow observed

CR-0-5	6/29/17					No flow observed
CR-0-6	6/29/17					No flow observed

2.2 Wet weather sample and inspection data Not Started

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

Outfall / Sample Ammonia date	Chlorine Conductivity Salinity	E. coli or Surfactants Water Jenu	p Pollutant of concern
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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 SVF's were identified. An example is provided below.

Outfall ID	Receiving Water	System Vulnerability Factors
CR-0-1	UNNAMED TRIBUTARY TO FRESHWATER BROOK	Initial rank as High Priority catchment due to presence of generating sites
CR-0-2	UNNAMED TRIBUTARY TO FRESHWATER BROOK	Initial rank as High Priority catchment due to presence of generating sites
CR-0-3	UNNAMED TRIBUTARY TO FRESHWATER BROOK	Initial rank as High Priority catchment due to presence of generating sites
CR-0-5	None	
CR-0-6	None	

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 that 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 that poor owner maintenance).

3.2 Key junction manhole dry weather screening and sampling data Not Started

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

3.3 Wet weather investigation outfall sampling data Planned for 2026 (low priority)

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants	

3.4 Data for each illicit discharge source confirmed through the catchment investigation procedure Not Started

Discharge Source location Discharge description discovery	Date of elimination discovery Date of elimination discovery Date of elimination discovery Mitigation or enforcement action solution volume of flow removed.

Part III: 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
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