Stormwater Management Plan (SMP)

State of Connecticut
Department of Correction

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KEY DEFINITIONS

Source: General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems, Issued January 20, 2016

“x-year, 24-hour rainfall event” means the maximum 24-hour precipitation event with a probable recurrence interval of once in the given number of years (i.e. x=2, 25 or 100), as defined by the National Weather Service in Technical Paper Number 40, “Rainfall Frequency Atlas of the United States,” May 1961, and subsequent amendments, or equivalent regional or state rainfall probability information developed therefrom.

“Aquifer protection area” means aquifer protection area as defined in section 22a-354h of the Connecticut General Statutes.

“Best engineering practices” means the design of engineered control measures to control pollution to the maximum extent achievable using measures that are technologically available and economically practicable.

“Best Management Practices (BMP)” means schedules of activities, practices (and prohibitions of practices), structures, vegetation, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the state consistent with state, federal or other equivalent and technically supported guidance. BMPs also include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from material storage.

“Catchment area” means the land area from which stormwater runoff is collected by a permittee’s MS4 and discharges through a single outfall to surface water.

“Coastal Jurisdiction Line” means the location of the topographical elevation of the highest predicted tide as defined in Section 22a-359(c) of the Connecticut General Statutes.

“Coastal waters” means coastal waters as defined in Section 22a-93(5) of the Connecticut General Statutes.

“Commissioner” means Commissioner as defined in section 22a-423 of the Connecticut General Statutes.

“Control Measures” means any BMPs or other methods (including effluent limitations) used to prevent or reduce the discharge of pollutants to waters of the state.

“Department” means the Department of Energy & Environmental Protection.

“Directly Connected Impervious Area (DCIA)” means that impervious area from which stormwater runoff discharges directly to waters of the state or directly to a storm sewer system that discharges to waters of the state. Impervious areas that discharge through a system designed to retain the appropriate portion of the Water Quality Volume (pursuant to Section 6(a)(5)(b)(i) or (ii) of this general permit) are not considered DCIA.
“Fresh-tidal wetland” means a tidal wetland located outside of coastal waters.

“Grab sample” means an individual sample collected in less than fifteen minutes.

“Guidelines” means the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended, established pursuant to Section 22a-328 of the Connecticut General Statutes.

“High Quality Waters” means those waters defined as high quality waters in the Connecticut Water Quality Standards pursuant to Section 22a-426-1(36) of the Regulations of Connecticut State Agencies.

“Illicit Discharge” means any unpermitted discharge to waters of the state that does not consist entirely of stormwater or uncontaminated ground water except those discharges identified in Section 3(a)(2) of this general permit when such non-stormwater discharges are not significant contributors of pollution to a discharge from an identified MS4.

“Impaired water(s)” means those surface waters of the state designated by the Commissioner as impaired pursuant to Section 303(d) of the federal Clean Water Act and as identified in the most recent State of Connecticut Integrated Water Quality Report within Categories 4 or 5, including any subdivisions of these categories.

“Individual permit” means a permit issued to a named permittee under Section 22a-430 of the Connecticut General Statutes.

“Inland wetland” means wetlands as that term is defined in Section 22a-38 of the Connecticut General Statutes.

“Low Impact Development” or “LID” means a site design strategy that maintains, mimics or replicates pre-development hydrology through the use of numerous site design principles and small-scale treatment practices distributed throughout a site to manage runoff volume and water quality at the source.

“Minimize”, for purposes of implementing the minimum control measures in Section 6 of this general permit, means to reduce and/or eliminate to the Maximum Extent Practicable (MEP) as described in Section 5(b).

“Municipal separate storm sewer system” or “MS4” means conveyances for stormwater (including roads with drainage systems, streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) owned or operated by any municipality or by any state or federal institution and discharging to surface waters of the state.

“Municipality” means a city, town or borough of the state as defined in section 22a-423 of the Connecticut General Statutes.

“New or Increased Discharge” means new discharge or activity as defined in section 22a-426-8(b)(3) and increased discharge or activity as defined in section 22a-426-8(b)(2), as referenced to the Regulations of Connecticut State Agencies.
"Permittee" means any municipality or any state or federal institution that initiates, creates, originates or maintains a discharge authorized by this general permit and that has filed a registration pursuant to Section 4 of this permit.

"Point Source" means any discernible, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged.

"Qualified professional engineer" means a professional engineer who: (1) has, for a minimum of eight (8) years, engaged in the planning and designing of engineered stormwater management systems for (i) municipal separate storm sewer systems and (ii) residential and commercial construction projects in accordance with the Guidelines and the Stormwater Quality Manual including, but not limited to, a minimum of four (4) years in responsible charge of the planning and designing of engineered stormwater management systems for such projects; or (2) is currently certified as a Professional in MS4 Stormwater Compliance as designated by EnviroCert International, Incorporated, or other certifying organization acceptable to the Commissioner, and for a minimum of six (6) years, has engaged in the planning and designing of engineered stormwater management systems for (i) municipal separate storm sewer systems and (ii) residential and commercial construction projects in accordance with the Guidelines and the Stormwater Quality Manual including, but not limited to, a minimum of two (2) years in responsible charge of the planning and designing of engineered stormwater management systems for such projects; or (3) currently provides engineering services for the Permittee by employ (e.g. Town Engineer) or by contract.

"Registrant" means a municipality or institution which files a registration pursuant to Section 4 of this general permit.

"Redevelopment" means any construction activity (including, but not limited to, clearing and grubbing, grading, excavation, dewatering) within existing drainage infrastructure or at an existing site to modify or expand or add onto existing buildings or structures, grounds, or infrastructure.

"Registration" means a registration form filed with the Commissioner pursuant to Section 4 of this general permit.

"Retain" means to hold runoff on-site to promote vegetative uptake and groundwater recharge through the use of runoff reduction or LID practices or other measures. In addition, it means there shall be no subsequent point source release to surface waters from a storm event defined in this general permit or as approved by the Commissioner.

"Runoff reduction practices" means those post-construction stormwater management practices used to reduce post-development runoff volume delivered to the receiving water, as defined by retaining the volume of runoff from a storm up to the first half inch or one inch of rainfall in accordance with Sections 6(a)(5)(B)(i) or (ii), respectively. Runoff reduction is quantified as the total annual post-development runoff volume reduced through canopy interception, soil amendments, evaporation, rainfall harvesting, engineered infiltration, extended filtration or evapotranspiration.
"Sanitary Sewer Overflow" or "SSO" means a discharge of untreated sanitary wastewater from a municipal sanitary sewer.

"Small MS4" means any municipally-owned or -operated MS4 (as defined above) including all those located partially or entirely within an Urbanized Area that have at least 1,000 residents in the Urbanized Area (as determined by the 2000 or 2010 census) and all state- and federally-operated MS4s (except DOT) and any other MS4s located outside an Urbanized Area as may be designated by the Commissioner. (Note: A list of Small MS4 municipalities is included in Appendix A of the General Permit. DOT will be authorized under a separate permit.)

"Standard of care", as used in Section 3(b)(9), means to endeavor to perform in a manner consistent with that degree of care and skill ordinarily exercised by members of the same profession currently practicing under similar circumstances.

"State or Federal Institution" or "institution" means any facility (including, but not limited to, state and federal prisons, office complexes, hospitals; university campuses, public housing authorities, schools, or other special districts) consisting of more than one building that is owned by an agency or department of the State of Connecticut (except the Department of Transportation) or a federal agency and has an average daily population of 1,000 people or more.

"Stormwater" means waters consisting of rainfall runoff, including snow or ice melt during a rain event.


"Surface water" means those waters as defined in Section 22a-426-1(60) of the Regulations of Connecticut State Agencies.

"Tidal wetland" means a wetland as that term is defined in Section 22a-29(2) of the Connecticut General Statutes.

"Total Maximum Daily Load (TMDL)" means a water quality implementation plan established pursuant to Section 303 of the federal Clean Water Act.

"Urbanized Area (UA)" means the areas of the State of Connecticut so defined by the U.S. Census Bureau for the 2000 or 2010 census.

"Water Quality Standards or Classifications" means those water quality standards or classifications contained in Sections 22a-426-1 through 22a-426-9, inclusive, of the Regulations of Connecticut State Agencies and the Classification Maps adopted pursuant to Section 22a-426 of the Connecticut General Statutes, which together constitute the Connecticut Water Quality Standards, as may be amended.

"Water Quality Volume" or "WQV" means the volume of runoff generated by one inch of rainfall on a site as defined in the Connecticut Stormwater Quality Manual.
**LIST OF ABBREVIATIONS/ACRONYMS**

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<tr>
<th>Abbreviation</th>
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<tr>
<td>APA</td>
<td>Aquifer Protection Area</td>
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<tr>
<td>BMP</td>
<td>Best Management Practice</td>
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<tr>
<td>CGP</td>
<td>Construction General Permit</td>
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<tr>
<td>COG</td>
<td>Council of Governments</td>
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<tr>
<td>CGS</td>
<td>Connecticut General Statutes</td>
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<tr>
<td>CT DEEP</td>
<td>Connecticut Department of Energy and Environmental Protection</td>
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<td>CT DOC</td>
<td>Connecticut Department of Correction</td>
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<td>CT DOT</td>
<td>Connecticut Department of Transportation</td>
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<td>DCIA</td>
<td>Directly Connected Impervious Area</td>
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<tr>
<td>GIS</td>
<td>Geographic Information System</td>
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<td>IC</td>
<td>Impervious Cover</td>
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<td>IDDE</td>
<td>Illicit Discharge Detection and Elimination</td>
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<td>ISAT</td>
<td>Impervious Surface Analysis Tool</td>
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<td>LID</td>
<td>Low Impact Development</td>
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<td>MCM</td>
<td>Minimum Control Measure</td>
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<td>MDC</td>
<td>Metropolitan District Commission</td>
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<td>MEP</td>
<td>Maximum Extent Practicable</td>
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<td>MS4</td>
<td>Municipal Separate Storm Sewer System</td>
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<tr>
<td>NDDB</td>
<td>Natural Diversity Database</td>
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<td>NEMO</td>
<td>Nonpoint Education for Municipal Officials</td>
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<td>NOAA</td>
<td>National Oceanic and Atmospheric Administration</td>
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<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
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<td>NRHP</td>
<td>National Register of Historic Places</td>
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<tr>
<td>QLP</td>
<td>Qualifying Local Program</td>
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<td>Acronym</td>
<td>Description</td>
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<td>SHPO</td>
<td>State Historic Preservation Office</td>
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<td>SMP</td>
<td>Stormwater Management Plan</td>
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<tr>
<td>SSO</td>
<td>Sanitary Sewer Overflow</td>
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<tr>
<td>SWPCP</td>
<td>Stormwater Pollution Control Plan</td>
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<tr>
<td>TMDL</td>
<td>Total Maximum Daily Load</td>
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<td>UA</td>
<td>Urbanized Area</td>
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<tr>
<td>US EPA</td>
<td>United States Environmental Protection Agency</td>
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<tr>
<td>WQV</td>
<td>Water Quality Volume</td>
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1.0 INTRODUCTION AND FACILITIES INFORMATION

1.1 BACKGROUND

The Connecticut Department of Energy and Environmental Protection (CT DEEP) has developed state stormwater permits that are issued under the authority of the United States Environmental Protection Agency’s (US EPA’s) National Pollutant Discharge Elimination System (NPDES) and Connecticut General Statutes Section 22a-430 and 22a-430b.

Phase I of the US EPA Stormwater Rule was published in 1990 and addressed runoff from medium and large municipal separate storm sewer systems (MS4s) with populations greater than 100,000, as well as runoff from industrial and construction activities. Phase II of the Stormwater Rule was published in 1999 and addressed runoff from small MS4s with populations less than 100,000.

CT DEEP first issued the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (General Permit) on January 9, 2004, under US EPA’s Phase II rule. The General Permit has been periodically reissued, without modifications, since 2004. The most recent issuance of the General Permit (i.e., “new” General Permit) included modifications and was issued January 20, 2016, and will become effective on July 1, 2017 and expire June 30, 2022. The new General Permit defines small MS4s as:

Any municipally-owned or -operated MS4 (as defined above) including all those located partially or entirely within an Urbanized Area that have at least 1,000 residents in the Urbanized Area (as determined by the 2000 or 2010 census) and all state- and federally-operated MS4s (except DOT) and any other MS4s located outside an Urbanized Area as may be designated by the Commissioner,

where:

“Municipal separate storm sewer system” or “MS4” means conveyances for stormwater (including roads with drainage systems, streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) owned or operated by any municipality or by any state or federal institution and discharging to surface waters of the state.

Based on these definitions, the Connecticut Department of Correction (CT DOC) operates six small MS4s within Urbanized Areas, with six state institutional prison facilities located wholly within UAs that have a staff and inmate population of 1,000 or more. The CT DOC was not covered under the previous General Permit and is considered a new permittee under the new General Permit. As such, the CT DOC is subject to timelines for compliance which vary from those applied to previous permittees.

EPA defines a regulated small MS4 as a municipality that owns and operates a storm sewer system in an Urbanized Area (UA). Urbanized Areas are defined by the Census Bureau and consist of densely populated areas surrounding urban centers. The criteria for designating UAs are developed by the Census Bureau and maps of UAs are published after each decennial census. The original maps governing the 2004 General Permit were based on the 2000 census. The most recent maps reflect the results of the 2010 census. EPA does not require coverage of municipalities outside of Urbanized Areas, but allows the permitting authority (CT DEEP) to designate additional regulated MS4s outside of Urbanized Areas.
The General Permit is largely self-administered. It is incumbent upon the CT DOC to be aware of and to comply with the conditions of the General Permit. The primary conditions of permit coverage are listed below.

- CT DEEP Permit Registration;
- Develop a SMP;
- Implement the SMP;
- Monitoring Requirements;
- Employee Training; and
- Annual Reporting.

1.2 PURPOSE AND OVERVIEW OF STORMWATER MANAGEMENT PLAN

This Stormwater Management Plan (SMP) has been developed by the CT DOC to comply with the General Permit. This SMP addresses the requirements established by the General Permit. This SMP has been designed to reduce the discharge of pollutants from the small MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the federal Clean Water Act.

The SMP outlines a program of best management practices (BMPs), designates responsible parties, defines timelines for implementation, identifies BMP location (if appropriate), and defines measurable goals for the following six minimum control measures (MCM):

1) Public Education and Outreach
2) Public Participation/Involvement
3) Illicit Discharge Detection and Elimination
4) Construction Site Runoff Control
5) Post-Construction Runoff Control
6) Pollution Prevention and Good Housekeeping

1.3 FACILITIES SUBJECT TO THE PLAN

1.3.1 Applicability

The Connecticut Department of Correction operates 18 correctional facilities, training facilities, a central office, and support facilities. In determining which facilities would be subject to the General Permit, the CT DOC used the following definition from the General Permit as a guide:

"State or Federal Institution" or "institution" means any facility (including, but not limited to, state and federal prisons, office complexes, hospitals; university campuses, public housing authorities, schools, or other special districts) consisting of more than one building that is owned by an agency or department of the State of Connecticut (except the Department of Transportation) or a federal agency and has an average daily population of 1,000 people or more. [emphasis added]

CT DOC reviewed their current facilities and operations and prepared the following table to determine General Permit applicability.
Table 1.
Based on this analysis, the following six facilities were determined by CT DOC to be part of its MS4:

1. Carl Robinson Correctional Institution, 285 Shaker Road, Enfield
2. Cheshire Correctional Institution, 900 Highland Avenue, Cheshire
3. Hartford Correctional Center, 177 Weston Street, Hartford
4. MacDougall Correctional Institution, 1153 East Street South, Suffield
5. Osborn Correctional Institution, 335 Bilton Road, Somers
6. York Correctional Institution, 201 West Main Street, Niantic

### 1.3.2 Requirements for General Permit Authorization

The General Permit has several requirements for permit authorization, related to compliance with other state and federal regulations and policies, as described in this section.

**Indian Lands**

None of the six correctional facilities are located on federally-recognized Indian Lands. As such, provisions in the General Permit relative to Indian Lands do not apply to CT DOC’s MS4.

**Coastal Boundary**

None of the six correctional facilities are located within the coastal boundary. As such, provisions in the General Permit relative to Coastal Boundary do not apply to CT DOC’s MS4.

**Endangered or Threatened Species**

The following three MS4s are located partially or entirely within CT DEEP Natural Diversity Database (NDDB) areas:

1. Carl Robinson Correctional Institution, 285 Shaker Road, Enfield
2. Cheshire Correctional Institution, 900 Highland Avenue, Cheshire
3. York Correctional Institution, 201 West Main Street, Niantic

In addition, none of the six MS4 Facilities are located within a town that have known hibernacula for the Northern Long Eared Bat, that is listed as endangered throughout the entire State.

No new activities are proposed within an area identified as habitat for endangered, threatened, or special concern species at the three facilities listed above as of the time this SMP was developed.

If new activities are proposed within a NDDB area at any of the identified facilities, CT DOC will follow the applicable provisions of the State Endangered Species Act, Connecticut General Statutes (CGS) Section 26-310(a).

If a proposed new activity under the General Permit falls within a NDDB area, CT DOC will submit a Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form (DEEP-APP-007), and all required attachments, including maps, to the NDDB for further review. When consulting the NDDB maps, CT DOC will consider the entire area impacted by a proposed...
activity, including any potential stormwater runoff or other associated disturbance, not just the activity’s immediate footprint.

Aquifer Protection Areas

Only one MS4 falls partially or entirely within a mapped Aquifer Protection Area (APA): York Correctional Institution in Niantic (East Lyme).

CT DOC will comply with the State of Connecticut Aquifer Protection Regulations (Section 22a-354i(1)-(10) of the Regulations of Connecticut State Agencies).

Per the General Permit, CT DOC will notify the applicable water company of the availability of the Registration for York Correctional Institution and the SMP, which CT DOC will provide to the company upon request.

Stormwater runoff generated from the York Correctional Institution will be managed in a manner so as to prevent pollution of groundwater, by following the guidance presented in Appendix C of the MS4 General Permit.

Conservation or Preservation Restrictions

There are no known conservation or preservation restrictions within CT DOC’s six MS4 Facilities, based on a review in March 2017.

State and Federal Historic Preservation

No activities are proposed in the SMP for the six correctional facilities that would include construction, result in earth disturbance, or that would affect historic structures, as of the time this SMP was developed.

If any activities are proposed that would result in earth disturbance or that would affect historic properties, CT DOC will consult the State Historic Preservation Office (SHPO) and will follow the applicable state and federal statutes, regulations, and policies related to historic properties.

Discharges to Impaired Waters

Currently, based on mapping review performed in June and July 2017, there are no direct discharges from the six CT DOC facilities to impaired waters.

If changes are proposed in the future at any of the six facilities which will cause a new or increased discharge of stormwater to an impaired water (based on the most up to date list of impaired waters at that time), the SMP will be modified to include documentation that there will be no net increase in loading to the impaired water of the pollutant for which the waterbody is impaired.

More information about impaired waters is included in Section 1.3.

Discharges to High Quality Waters

The General Permit defines high quality waters as follows:
“High Quality Waters” means those waters defined as high quality waters in the Connecticut Water Quality Standards pursuant to Section 22a-426-1(36) of the Regulations of Connecticut State Agencies.

The regulation referenced in the above definition defines high quality waters as follows:

“High Quality Waters” means surface waters where the water quality is better than necessary to meet the minimum criteria established in the Connecticut Water Quality Standards for the applicable classification and related designated uses.

Based on these definitions, it would appear that any waters not listed as “impaired” may be high quality waters.

The General Permit indicates that any new or increased stormwater discharges to high quality waters shall be discharged in accordance with the Connecticut Anti-Degradation Implementation Policy in the State Water Quality Standards. At the time this SMP was prepared, no BMPs or activities are proposed at any of the six facilities that would constitute new or increased discharges. If future BMPs or activities would cause a new or increased discharge, CT DOC will ensure that the new or modified discharge meets the requirements of the policy.

The following subsections describe the individual facilities which make up the CT DOC MS4 and describe site specific information for each Institution relative to location, receiving waters, population, and other permit specific items, as discussed below.

1.3.3 Carl Robinson Correctional Institution, Enfield

1.3.3.1

1.3.3.2 Urbanized Area

The Carl Robinson Correctional Institution is located entirely within Urbanized Area.

1.3.3.3 Watersheds and Water Quality Classifications

As shown on Figure 1, the Carl Robinson Correctional Institution is primarily within the Freshwater Brook Watershed (4003-00-1, 4003-01-1) with a small portion within the Scantic River Watershed (4200-23-1). Freshwater Brook and its tributaries have a surface water quality
classification of “A” and are not impaired. Terry Brook, tributary to the Scantic River, has a surface water quality classification of “A” and is not impaired. Based on current mapping, no stormwater from the facility discharges to Terry Brook. Discharges from the site are to unnamed tributaries to Freshwater Brook.

Waters of class A include inland surface waters with designated uses including potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency and clean water discharges.

1.3.4 Cheshire Correctional Institution, Cheshire

1.3.4.1

1.3.4.2 Urbanized Area

The Cheshire Correctional Institution is located entirely within Urbanized Area. The drainage system from the northern portion of the facility appears to discharge to the storm drain in Jarvis Street, part of the Town of Cheshire MS4. CT DOC will provide a copy of the General Permit Registration Form to the Town of Cheshire.

1.3.4.3 Watersheds and Water Quality Classifications

As shown on Figure 2, the Cheshire Correctional Institution is within the Tenmile River Watershed (5202-10-1) and the Quinnipiac River Watershed (5200-07-1). A tributary to the Tenmile River is located approximately 1,500 feet to the west of the facility and has a surface water quality classification of “A” west of the facility which transitions to “B” to the northwest of the facility. Within the Quinnipiac River Watershed, Honeypot Brook is located approximately 0.5 mile to the east of the facility and has a surface water quality classification of “A”. Neither brook is impaired. Based on current mapping, stormwater discharges from the facility to go to unnamed tributaries of Tenmile River and unnamed tributaries of Honeypot Brook.
Waters of class A include inland surface waters with designated uses including potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency, and clean water discharges.

Waters of class B include inland surface waters with designated uses including recreational use, fish and wildlife habitat, agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to those allowed in Class A waters, and cooling waters, discharges from industrial and municipal wastewater treatment facilities (providing Best Available Treatment and Best Management Practices are applied), and other discharges subject to the provisions of section 22a-430 CGS.

1.3.5 Hartford Correctional Center, Hartford

1.3.5.1

1.3.5.2 Urbanized Area

The Hartford Correctional Center is located entirely within Urbanized Area. The drainage system from the facility discharges to a storm drain located in Weston Street, which is part of the City of Hartford MS4, and also to an MDC drain on the opposite side of the property. CT DOC will provide a copy of the General Permit Registration Form to the City of Hartford and MDC (upon request).

1.3.5.3 Watersheds and Water Quality Classifications

As shown on Figure 3, the Hartford Correctional Center is entirely within the Connecticut River Watershed (4000-26-1). The closest segment of the Connecticut River to which the facility likely discharges has a surface water quality classification of “SB” and is impaired for E. coli, but the first receiving waters are an unnamed stream and unnamed pond tributary to the Connecticut River. As such, no direct discharges are to the Connecticut River. The watercourse and waterbody at the discharge points are listed as surface water quality class A.
Waters of class SB include coastal and marine surface waters with designated uses including marine fish, shellfish and wildlife habitat, shellfish harvesting for transfer to approved areas for purification prior to human consumption, recreation, industrial and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency and clean water discharges, cooling waters, discharges from industrial and municipal wastewater treatment facilities (providing Best Available Treatment and Best Management Practices are applied), and other discharges subject to the provisions of section 22a-430 CGS.

1.3.6 MacDougall Correctional Institution, Suffield

1.3.6.1

1.3.6.2 Urbanized Area

The MacDougall Correctional Institution is located entirely within Urbanized Area. The drainage system from the facility discharges to wetlands and does not have an interconnection with another MS4.

1.3.6.3 Watersheds and Water Quality Classifications

As shown on Figure 4, the MacDougall Correctional Institution is primarily within the Stony Brook Watershed (4100-17) with a small portion within the Connecticut River Watershed (4000-00). However, the facility has no discharges directed to the Connecticut River. A tributary to Stony Brook crosses the facility and has a surface water quality classification of “A” and is not impaired. Stormwater discharges from the facility are to an unnamed tributary of Stony Brook (4100-17-1).
Waters of class A include inland surface waters with designated uses including potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency, and clean water discharges.

1.3.7 Osborn Correctional Institution, Somers

1.3.7.1 Urbanized Area

The Osborn Correctional Institution is located entirely within Urbanized Area. The drainage system from the facility discharges to wetlands and does not have an interconnection with another MS4.

1.3.7.3 Watersheds and Water Quality Classifications

As shown on Figure 5, the Osborn Correctional Institution is within the Woods Stream Watershed (4200-21) and the Wrights Brook Watershed (4200-20). A tributary to Woods Stream (4200-21-1-L1) is located in proximity to the facility and has a surface water quality classification of “A”. A tributary to Wrights Brook (4200-20-1) is located to the east of the facility and has a surface water quality classification of “A”. Neither set of brook tributaries is listed as impaired. Stormwater discharges from the site are to unnamed tributaries of Woods Stream and Wrights Brook.

Waters of class A include inland surface waters with designated uses including potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency, and clean water discharges.
1.3.8 York Correctional Institution, Niantic

1.3.8.2 Urbanized Area
The York Correctional Institution is located entirely within Urbanized Area.

1.3.8.3 Watersheds and Water Quality Classifications
As shown on Figure 6, the York Correctional Institution is within the Bride Brook Watershed (2206-00). The facility discharges to an unnamed tributary of Bride Brook near the Route 156 crossing (2206-00-2-R1). Other portions of the facility discharge to an unnamed tributary to Bride Lake (2206-00-1-L1).

Waters of class A include inland surface waters with designated uses including potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation. Discharges are restricted to discharges from public or private drinking water treatment systems, dredging and dewatering, emergency, and clean water discharges.
2.0 MCM#1 – PUBLIC EDUCATION AND OUTREACH

2.1 OVERVIEW

Goals:

- Raise staff and inmate awareness that polluted stormwater runoff is the most significant source of water quality problems;
- Motivate staff and inmate populations to use Best Management Practices (BMPs) that reduce polluted stormwater runoff; and
- Reduce polluted stormwater runoff in MS4 as a result of increased awareness and utilization of BMPs.

Under this MCM, CT DOC will develop and implement a public education and outreach program to provide materials to educate staff and inmates about stormwater.

Because of the potential for security issues related to the dissemination of certain types of educational information to the inmate population, CT DOC has coordinated with CT DEEP, who agreed that public education and outreach should include staff and inmates, but that inmate education may differ from education provided to staff, to avoid providing inmates with information that could be used to the detriment of CT DOC facilities. Education materials and any education program will be reviewed and approved by CT DOC prior to dissemination to the inmate population.

2.2 BEST MANAGEMENT PRACTICES

2.2.1 Summary of BMPs for MCM#1

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-1</td>
<td>Implement public education program for inmates and staff</td>
</tr>
<tr>
<td>1-2</td>
<td>Address education / outreach for pollutants of concern</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Responsible Party/Job Title</th>
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</thead>
<tbody>
<tr>
<td>CT DOC Facilities Management and Engineering</td>
</tr>
<tr>
<td>CT DOC Facilities Management and Engineering</td>
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<table>
<thead>
<tr>
<th>Implementation Timeline</th>
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<tbody>
<tr>
<td>7/1/17-7/1/18</td>
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<tr>
<td>7/1/17-7/1/18</td>
</tr>
<tr>
<td>7/1/18-6/30/22</td>
</tr>
<tr>
<td>7/1/18-6/30/22</td>
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</table>

<table>
<thead>
<tr>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop/acquire materials</td>
</tr>
<tr>
<td>One message per year and topic area</td>
</tr>
<tr>
<td>Develop/acquire materials</td>
</tr>
<tr>
<td>One message per year and topic area</td>
</tr>
</tbody>
</table>

(Not Applicable)
2.2.2 BMP Descriptions

2.2.2.1 BMP 1-1: Implement Public Education Program

CT DOC will implement a public education program for CT DOC staff and inmates as part of this BMP. Topic areas will include the following, per the General Permit:

- Identifying pollutants associated with stormwater discharges and their sources, as well as environmental impacts of these pollutants and related pollution reduction practices (including pathogens/bacteria, nitrogen, phosphorus, sediments, metals, oils & greases),
- Management of animal waste from K9 unit animals,
- Proper application of fertilizers, herbicides, and pesticides,
- How impervious cover affects stormwater, and
- Impacts of illicit discharges and improper waste disposal into the stormwater system.

In the first permit year (July 2017-July 2018), CT DOC will acquire educational materials on the above topics to be used during the permit term from available sources such as CT DEEP, Nonpoint Education for Municipal Officials (NEMO), US EPA, regional Council of Governments (COG), etc., and/or develop their own materials for specific topics of interest.

Materials will be posted, distributed, or otherwise disseminated in a manner to reach all staff and inmates, starting in the second year of the permit and continuing throughout the permit (7/18-6/22), with a measurable goal of distributing at least one educational flyer/poster/material per year and covering each topic area over the course of the General Permit term. To the maximum extent practicable, information will be provided in English and Spanish.

Recordkeeping and Reporting

Items to be recorded with this SMP (in appendix for Educational Materials) and reported in the Annual Report each year include the following:

- Progress made toward overall goal
- Number of materials disseminated
- Type/topic of material and source for each
- Method of dissemination (flyer, poster, website posting, etc.) and date of dissemination
- In SMP appendices, keep copies of all materials disseminated

2.2.2.2 BMP 1-2: Address Education/Outreach for Pollutants of Concern

This BMP applies only to MS4 Facilities which have a Stormwater Pollutant of Concern, due to a direct discharge to impaired waters. Currently, based on mapping review performed in June and July 2017, there are no direct discharges from the six CT DOC facilities to impaired waters. Therefore, this BMP is not applicable.
Recordkeeping and Reporting
In the initial Annual Report, DOC will indicate this BMP is not required because there are no direct discharges to impaired waters.
3.0 MCM#2 – Public Participation/Involvement

3.1 Overview

Goals:

- Involve the public in planning and implementing the CT DOC’s stormwater management activities.
- Provide a minimum 30-day notice to the public for this plan and annual reports.

Under this MCM, CT DOC will provide public notice in accordance with General Permit requirements for the SMP and Annual Reports and will provide opportunities for the public to review the SMP and Annual Reports.

3.2 Best Management Practices

3.2.1 Summary of BMPs for MCM#2

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-1</td>
<td>Comply with public notice requirements for the SMP and Annual Reports</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>4/3/17</td>
<td>Public notice for SMP</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1/31/18 and 1/31 of each permit year thereafter</td>
<td>Public notices for Annual Reports</td>
</tr>
</tbody>
</table>

3.2.2 BMP Descriptions

3.2.2.1 BMP 2-1: Comply with Public Notice Requirements

Registrations and SMP

CT DOC will provide in the registrations due April 3, 2017, the URL where the draft SMP will be available for review and comment. Within thirty (30) days of receipt of the URL, DEEP will post on their website a list of the SMPs submitted and identify the location where the SMP will be available for review. On or before sixty (60) days from April 3, 2017, members of the public may review the SMP and submit written comments to DEEP.

The CT DOC will also make the SMP available online and at a location for public review and comment. The SMP will be available at the CT DOC Central Office, 24 Wolcott Hill Road, Wethersfield, CT 06109. Appointments to review the SMP can be made by contacting Rich Pease at (860) 692-7562 or via e-mail at rich.pease@ct.gov.
Because certain SMP components may contain sensitive information that cannot be released to the public for security reasons, certain portions of the SMP may be redacted and not be available for public review.

If the public notice process changes from what is identified in this SMP, DOC will append documentation of the changes and approvals from CT DEEP to this document and provide it in the relevant Annual Reports.

**Annual Reports**

CT DOC will publish a public notice on their website each year of the permit term by January 31st (first notice on January 31, 2018), to inform the public of the availability of that year’s Annual Report for review and comment.

The Public Notice for the Annual Report will include the following information and will allow for a 45-day comment period:

- Contact name with phone number, address, and email where comments can be sent.
- URL for website where Annual Report will be available for public review.

The CT DOC will also make the Annual Report available at a location for public review and comment. From January 31st – March 17th of each year, the Annual Report will be available at the CT DOC Central Office, 24 Wolcott Hill Road, Wethersfield, CT 06109. Appointments to review the Annual Report can be made by contacting Rich Pease at (860) 692-7562 or via e-mail at rich.pease@ct.gov. The first Annual Report is due on April 1, 2018.

Because certain Annual Report components may contain secure information that cannot be released to the public for security reasons, certain portions of the draft Annual Report may be redacted and not be available for public review.

The Measurable goals for this BMP will be to meet the public notice requirements and timelines tabulated in this section and stated herein for each year of the General Permit.

**Recordkeeping and Reporting**

CT DOC will include printouts of the Public Notices from the website in the appropriate SMP appendices for documentation and record the dates of posting.

In the Annual Report, CT DOC will document the dates when the public notices, reports, and Plan were made available to the public.
4.0 MCM#3 – ILLEGIT DISCHARGE DETECTION AND ELIMINATION

4.1 OVERVIEW

**Goal:**
- Find the source of any illicit discharges; eliminate those illicit discharges; and ensure ongoing screening and tracking to prevent and eliminate future illicit discharges.

Under this MCM, CT DOC will develop and implement its written Illicit Discharge Detection and Elimination (IDDE) plan, as well as the required lists of outfalls, inventory of sanitary sewer overflows (if applicable), and mapping. This MCM will also include developing recordkeeping methods and establishing legal authority and a reporting program.

At a minimum, the IDDE program will be implemented within the Urbanized Area and within catchment areas of the MS4 that are “priority areas” which:

- Have directly connected impervious area (DCIA) of greater than 11% and/or
- Discharge to impaired waters (not currently applicable to CT DOC facilities).

Specific BMPs are described in the following subsections.

4.2 BEST MANAGEMENT PRACTICES

4.2.1 Summary of BMPs for MCM#3

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
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</thead>
<tbody>
<tr>
<td>3-1</td>
<td>Develop IDDE Program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Written IDDE Program</td>
</tr>
<tr>
<td>3-2</td>
<td>Develop list and maps of all MS4 stormwater outfalls in urbanized and priority areas</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>List &amp; Maps of Outfalls</td>
</tr>
<tr>
<td>3-3</td>
<td>Develop citizen reporting program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Posting of program information, Number of reports, illicit discharges identified &amp; corrected</td>
</tr>
<tr>
<td>3-4</td>
<td>Establish legal authority to prohibit illicit discharges</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Establish written procedures</td>
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<tr>
<td>BMP ID</td>
<td>BMP</td>
<td>Responsible Party/Job Title</td>
<td>Implementation Timeline</td>
<td>Measurable Goal(s)</td>
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</tr>
<tr>
<td>3-5</td>
<td>Develop record keeping system for IDDE tracking</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Number of illicit discharges removed</td>
</tr>
<tr>
<td>3-6</td>
<td>Address IDDE in areas with pollutants of concern (Not Applicable after further review of the York facility storm drain system, which does not directly discharge to impaired waters)</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Number of failing septic systems identified, addressed</td>
</tr>
<tr>
<td>3-7</td>
<td>Develop inventory of sanitary sewer overflows</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>11/1/17</td>
<td>Number of SSOs/Inventory complete</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>11/17-6/27</td>
<td>Report number of SSOs and corrective measures</td>
</tr>
<tr>
<td>3-8</td>
<td>Develop system map of entire institution</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>6/30/22</td>
<td>Number of outfalls, systems, structures catchments mapped</td>
</tr>
<tr>
<td>3-9</td>
<td>Implement IDDE program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/20-6/27</td>
<td>Illicit discharges, volume of flow removed, # of employees trained</td>
</tr>
</tbody>
</table>

**4.2.2 BMP Descriptions**

**4.2.2.1 BMP 3-1: Develop IDDE Program**

By July 1, 2019, CT DOC will develop a written IDDE Program for the purpose of detecting, locating and eliminating illicit discharges from the MS4 within the UA and priority areas. This is the measurable goal for this BMP.

Each facility is located entirely within Urbanized Area.

The Program will include the following components:

- Legal Authority to prohibit, investigate, 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 (potentially for ammonia, chlorine, surfactants), storage/conveyance of samples, hold times, etc.
  o Develop a schedule and parameters for outfall and interconnection screening and 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/Sanitary Sewer Overflow (SSO) Removal and Confirmation
• Follow-up Screening
• Illicit Discharge Prevention Procedures

Recordkeeping and Reporting
CT DOC will record the date that the IDDE written program is complete and report this in the appropriate Annual Report. If not complete in first year, document the percent complete for the written plan.

4.2.2.2  BMP 3-2: Develop List and Maps of Outfalls in Urbanized/Priority Areas

CT DOC will overlay UAs onto the MS4 Facilities and will also identify catchment areas of the MS4 Facilities with either Directly Connected Impervious Area (DCIA) of greater than 11% or which discharge to impaired waters (“priority” areas).

CT DOC will develop a preliminary comprehensive list/database (in Microsoft Excel format) and maps (min. scale 1 inch = 2000 ft, max. scale 1 inch = 100 ft) of stormwater discharge (outfall) locations and interconnections utilizing available CT DOC facility drainage maps. Maps which are available from CT DOC in paper only (Carl Robinson, MacDougall, and Osborn) will be scanned and locations of outfalls and interconnections digitized using ArcGIS. Latitude/longitude will be identified using ArcGIS. The maps and listing will include the following information:

• Unique outfall identifier, type, material, size, shape, and location (latitude / longitude) of conveyance, outfall, or channelized flow, physical condition, and indicators of potential non-stormwater discharges as of most recent inspection,
• Name, waterbody ID and Surface Water Quality Classification of the immediate surface water body or wetland to which the outfall eventually discharges,
• If the outfall does not discharge directly to a named water body, the name and waterbody ID of the nearest named waterbody to which the outfall eventually discharges, and
• The name of the watershed, including the sub-regional drainage basin number in which the discharge is located.
Field investigations will be conducted to confirm outfall and interconnection locations identified on the available mapping, and to potentially identify outfall and interconnection locations not previously mapped.

These lists and maps will be developed by the CT DOC by July 1, 2020, as a measurable goal.

*Recordkeeping and Reporting*

All documentation (maps, listings, photos, etc.) will be maintained with the SMP for each facility. If not complete in the first year, each Annual Report will document the percent complete and progress made that year. Mapping will not be released to the public in paper or electronic format, nor will it be posted online, per discussions with CT DEEP, for security reasons. If required, CT DOC will work to provide necessary information to CT DEEP in a secure manner and with the understanding that information will not be made public.

**4.2.2.3 BMP 3-3: Develop Citizen Reporting Program**

For the CT DOC facilities, “citizens” will consider the staff and inmate population, per discussions with CT DEEP.

CT DOC will provide clear instructions on their website and/or via other means to instruct inmates and staff on how to submit an illicit discharge report. The reporting program will include an email address and a phone number or other means for submissions. This will be developed and posted/advertised by July 1, 2019.

CT DOC will promptly investigate all such reports and field inspect the reported location/issue and incorporate the reported outfall/issue into its IDDE program if warranted.

*Recordkeeping and Reporting*

CT DOC will print a copy of the website where the citizen reporting program is advertised with instructions and note the date of the posting. This will be maintained with the SMP.

CT DOC will maintain a log of citizen reports, documentation of the investigations to follow up on these reports, the number of illicit discharges identified from these reports, and the number of illicit discharges corrected from those reported as part of this BMP, as well as responses from CT DOC to the “citizen”.

This information will be recorded in the appropriate SMP appendix and documented in each Annual Report for the reports and follow-up actions taken that permit year.

**4.2.2.4 BMP 3-4: Establish Legal Authority to Prohibit Illicit Discharges**

As the CT DOC MS4 is limited to CT DOC properties, CT DOC has full authority to prohibit, investigate, and remove illicit discharges from its MS4 properties, and separate legal authority is not required. However, CT DOC will develop a policy for its own operations to investigate and remove illicit discharges. As a measurable goal, this policy will be developed, finalized, and disseminate internally by July 1, 2019.

CT DOC will develop and disseminate internally a policy regarding illicit discharges which will:
• Prohibit illicit discharges to its storm sewer system and require removal of such discharges consistent with the General Permit timelines;

• Control the discharge of spills and prohibit the dumping or disposal of materials including, but not limited to, residential, industrial and commercial wastes, trash, used motor vehicle fluids, pesticides, fertilizers, food preparation waste, leaf litter, grass clippings, and animal wastes into its MS4; and

• Authorize fines or penalties and/or recoup costs incurred by the permittee from anyone creating an illicit discharge or spilling or dumping per the General Permit. Because CT DOC has state institutions, where this provision may conflict with existing rules, regulations, policies, chain of command or other circumstances, alternate provisions for enforcement may be utilized. CT DOC will document these in their policy.

**Recordkeeping and Reporting**

CT DOC will append a copy of the final, dated policy to this SMP and report the date of the approval/circulation of the policy in the Annual Report.

4.2.2.5 **BMP 3-5: Develop Recordkeeping System for IDDE Tracking**

CT DOC will develop a spreadsheet-based system for maintaining a record of illicit discharge abatement activities including, at a minimum, location (latitude/longitude), description, date(s) of inspection, sampling data (if applicable), action(s) taken, date of removal or repair, and responsible parties. ArcGIS mapping system may be used to facilitate record keeping.

This system will be developed by July 1, 2019, as a measurable goal.

**Recordkeeping and Reporting**

The system will be used as indicated above to track IDDE abatement and will be maintained on a regular basis. For each Annual Report, the spreadsheet will be provided as part of CT DOC’s Annual Report. If there is information that must be confidential and not posted online with the Annual Report, this will be documented as well and discussed with CT DEEP.

4.2.2.6 **BMP 3-6: Address IDDE in Areas with Pollutants of Concern**

For the MS4 Facilities where there is a discharge to an impaired water, this BMP is required. An initial assessment had included Hartford and York as discharging to impaired waters, under which scenario, this BMP would have been applicable to the York facility. However, drainage system review has shown that the immediate receiving waters for York and Hartford are not impaired; thus, this requirement does not apply.

**Recordkeeping and Reporting**

In the initial Annual Report, DOC will indicate this BMP is not required because there are no direct discharges to impaired waters.
4.2.2.7  **BMP 3-7: Develop Inventory of Sanitary Sewer Overflows**

CT DOC will identify known locations where SSOs have discharged to the MS4 within the previous five years. The inventory will include:

- Location;
- Discharge location – to the MS4 or to a Receiving water (name of receiving water);
- Starting and ending date(s) and time(s) of SSO occurrence;
- Estimated volume of the occurrence;
- Description of the occurrence indicating known or suspected cause(s);
- Mitigation and corrective measures completed with dates implemented; and
- Mitigation and corrective measures planned with implementation schedules.

The following actions will be taken by CT DOC during this General Permit cycle:

- Develop an inventory of SSOs by November 1, 2017.
- Update SSO Inventory annually.
- Annual Report to include the updated SSO inventory.
- Identify number of SSOs within each catchment.
- Identify completed, ongoing, or planned corrective measures addressing confirmed SSOs.
- Develop a schedule for completing and verifying measures correcting the confirmed SSOs.

CT DOC will provide written notice to the Commissioner of CT DEEP within five days of becoming aware of an SSO occurrence and include the information in the updated inventory.

**Recordkeeping and Reporting**

CT DOC will maintain and update the SSO inventory annually at a minimum and will provide this information in each Annual Report. The other information identified above will also be maintained with this SMP and reported in each Annual Report.

4.2.2.8  **BMP 3-8: Develop System Map**

CT DOC will prepare a map of CT DOC MS4 system using GIS, as required by the General Permit, by June 30, 2022, as a measurable goal. The map will include parts of the MS4 within Urbanized Areas and those catchment areas of the MS4 with either DCIA of greater than 11% or which discharge to impaired waters.

The map will include:

- MS4 elements;
  - Outfalls & receiving waters;
  - Pipes;
  - Open channel conveyances (Swales, ditches, etc.);
  - Catch basins
• Manholes
• Interconnections with other MS4s and other storm sewer systems;
• CT DOC-owned stormwater treatment structures (e.g., detention and retention basins, infiltration systems, bioretention areas, water quality swales, gross particle separators, oil/water separators, or other proprietary systems)
  • Catchment delineations; and
  • Waterbodies identified by name and indication of all use impairments as identified on the most recent Integrated Water Quality Report pursuant to Clean Water Act section 303(d) and 305(b).

The map will include, where available:

• Sanitary sewer system; and
• Combined sewer system, if applicable.

CT DOC will consider including the following elements on the map:

• Storm sewer material, size, and age;
• Sanitary sewer system material, size, and age;
• Areas served by a septic system;
• Seasonal high water table elevations impacting sanitary alignments;
• Topography;
• Orthophotography;
• Alignments, dates and representation of work completed (with legend) of past illicit discharge investigations (e.g., flow isolation, dye testing, CCTV); and
• Locations of suspected, confirmed, and corrected illicit discharges (with dates and flow estimates).

Recordkeeping and Reporting

For each Annual Report, the CT DOC will report progress on the map in terms of estimated percent complete and number of outfalls/interconnections mapped, number of catchments delineated, number of structures mapped, etc. The map will not be publicly available, but may be provided to CT DEEP if necessary.

4.2.2.9 BMP 3-9: Implement IDDE Program

CT DOC will implement elements of IDDE program not otherwise included in separate BMPs. These elements include:

• Assessment and Priority Ranking of Catchments – to be documented and completed by June 30, 2022;
• Outfall and Interconnection Screening and Sampling;
• Catchment Investigations;
• Removal of illicit discharges;
• Confirmatory outfall/interconnection screening (within one year);
• Follow-up screening (within five years);
• Annual employee IDDE training.

Other elements and deadlines which will be discussed further in the IDDE Program document include:

• Dry weather screening and sampling – complete all outfalls/interconnections by June 30, 2022.
• Catchment Investigation Procedure completed in 40% of the MS4 area by June 30, 2022.
  o Completion of 80% of Problem Catchments by 7/1/2020 and 100% of Problem Catchments by 6/30/2022.
• Catchment Investigation Procedure completed in 100% of the MS4 area by June 30, 2027.
• Number of employees trained each year.

**Recordkeeping and Reporting**

Documentation for all of the required elements of the IDDE program will be maintained with the IDDE report and SMP. The Annual Reports will quantify and document progress toward measurable goals each year. Information to be included under this task in Annual Reports includes:

• Listing of catchments and results of priority ranking;
• For each catchment, a summary of evidence of known or suspected illicit discharges;
• Completed, ongoing, or planned corrective measures addressing confirmed illicit discharges;
• A schedule for completing and verifying measures correcting the confirmed illicit discharges;
• Documented presence or absence of System Vulnerability Factors for each catchment;
• Dry and wet weather sampling results;
• Location(s) and source(s) of illicit discharges, a description of the discharge, the method of discovery, date of elimination, mitigation or enforcement action, estimate volume of flow removed.
5.0 MCM#4 – CONSTRUCTION SITE RUNOFF CONTROL

5.1 OVERVIEW

Goal:
- Minimize polluted stormwater runoff from construction sites and prevent it from carrying sediment into waterways via MS4 infrastructure.

This MCM is aimed at controlling and preventing the discharge of polluted stormwater from construction sites associated with one acre or more of earth disturbance, regardless of phasing, and considering larger common plans of development.

5.2 BEST MANAGEMENT PRACTICES

5.2.1 Summary of BMPs for MCM#4

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-1</td>
<td>Implement, upgrade and enforce land use regulations or other legal authority regarding land disturbance and development greater than one acre</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>Establish written procedures</td>
</tr>
<tr>
<td>4-2</td>
<td>Develop/Implement plan for interdepartmental coordination in site plan review and approval</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Written interdepartmental coordination procedures</td>
</tr>
<tr>
<td>4-3</td>
<td>Review site plans for stormwater quality concerns</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Number of site plan reviews</td>
</tr>
<tr>
<td>4-4</td>
<td>Conduct site inspections</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Number of site inspections</td>
</tr>
<tr>
<td>4-5</td>
<td>Implement procedure to allow public comment on site development</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Established policy</td>
</tr>
</tbody>
</table>
5.2.2 BMP Descriptions

5.2.2.1 BMP 4-1: Implement/Enforce Land Use Regs. to Meet General Permit

As the CT DOC MS4 is limited to CT DOC property, CT DOC has full authority to control development procedures and implement construction site runoff control. There are no land use regulations within CT DOC’s structure. However, by July 1, 2020, CT DOC will establish and document procedures required within its own operations to meet the requirements of the MS4 General Permit, namely:

- CT DOC, construction site operators, or contractors must maintain consistency with the 2002 Guidelines for Soil Erosion and Sedimentation Control, as amended, the Connecticut Stormwater Quality Manual, and all stormwater discharge permits issued by CT DEEP within the institutional boundary pursuant to CGS 22a-430 and 22a-430b;
- The implementation of additional measures to protect/improve water quality (in addition to the above requirements) as deemed necessary by the institution;
- CT DOC to carry out all inspection, surveillance and monitoring procedures necessary to determine compliance with applicable regulations, ordinances or programs or institutional requirements related to the management of the MS4. Specifically, inspections will be conducted, where allowed, to inventory the number of retention ponds, detention ponds and other stormwater basins that discharge to or receive drainage from the MS4;
- CT DOC to provide and comply with a long term maintenance plan and schedule to ensure the performance and pollutant removal efficiency of all retention ponds, detention ponds and other stormwater basins that discharge to or receive discharge from the MS4 including short-term and long-term inspection and maintenance measures to be implemented by the CT DOC; and
- CT DOC to control through interagency or inter-jurisdictional agreements, the contribution of pollutants between the CT DOC’s MS4 and MS4s owned or operated by others.
Recordkeeping and Reporting

CT DOC will document progress toward this BMP in each Annual Report until it is complete and will include documentation in the form of the final procedure/policy document and completion date as part of this SMP and to CT DEEP as part of the Annual Report if needed.

5.2.2.2 BMP 4-2: Develop/Implement Plan for Interdepartmental Coordination

As the CT DOC MS4 is limited to CT DOC property, CT DOC has full authority to control development procedures, provided they meet the conditions of all applicable regulations and permit approvals.

For compliance with this General Permit, on or before July 1, 2017, CT DOC will establish and document procedures outlining how all CT DOC-institutional departments and boards with jurisdiction over the review, permitting, or approval of land disturbance and development projects within the MS4 will coordinate their functions with one another.

Recordkeeping and Reporting

CT DOC will include documentation in the SMP in the form of the final policy document created for BMP compliance and will document the date it was finalized. This information will be included in the first Annual Report to complete this BMP.

5.2.2.3 BMP 4-3: Review Site Plans for Stormwater Quality Concerns

CT DOC will establish written procedures by July 1, 2017, to ensure review of site plans for consideration of stormwater controls or management practices to prevent or minimize impacts to water quality. A checklist may be developed to assist with the site plan review procedures. For each development/redevelopment project at a CT DOC MS4 Facility, CT DOC will conduct a site plan review in accordance with the written procedures.

Recordkeeping and Reporting

The written procedure will be dated and appended to this SMP and reported in the first Annual Report. As a measurable goal, for each Annual Report, the number of site plan reviews will be documented in this SMP and reported, including the name of the Site, project, and date.

5.2.2.4 BMP 4-4: Conduct Site Inspections

For each development/redevelopment project at a CT DOC MS4 Facility, CT DOC will conduct a site inspection during construction and at the end of construction to assess the adequacy of the installation, maintenance, operation, and repair of construction and post-construction stormwater control measures. A checklist to assist with inspections may be developed. CT DOC will establish written procedures for this review by July 1, 2017 and will begin inspections on this date, for any new construction/redevelopment.

Recordkeeping and Reporting

The approved policy with date of approval will be appended to this SMP and reported in the Annual Report. As a measurable goal, the following will be recorded in the SMP and included in each applicable Annual Report:
• Number of site inspections conducted
• For each:
  o Site name/Project
  o Date
  o A summary of any improvements made/needed.

5.2.2.5 **BMP 4-5: Implement Procedure for Public Comment on Site Development**

CT DOC will develop a written procedure by July 1, 2017, for receipt and consideration of information submitted by the public concerning proposed and ongoing land disturbance and development activities.

**Recordkeeping and Reporting**

The developed policy will be dated and appended to this SMP and information provided in the first Annual Report. The measurable goal includes recording the following in the SMP and tracking/reporting the following in the Annual Report:

• Number of comments received and who from,
• Date,
• Project,
• Location, and
• Action taken to address/respond to the comment.

5.2.2.6 **BMP 4-6: Implement Procedure to Notify Contractors about CGP**

CT DOC will develop a written procedure by July 1, 2017, to notify CT DOC contractors working at any of the MS4 Facilities that they may be obligated to obtain authorization under the CT DEEP’s General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (“Construction General Permit”, or CGP) if the project disturbs one or more acres of land, either individually or collectively, as part of a larger common plan, and results in a point source discharge to the surface waters of the State directly or through the CT DOC’s MS4. The notification will include a provision informing the contractor of their obligation to provide a copy of the Stormwater Pollution Control Plan (SWPCP) to the CT DOC upon request.

**Recordkeeping and Reporting**

The written procedure will be dated and included in the SMP, as well as reported in the first Annual Report. Thereafter, CT DOC will record the following in the SMP and report the information in the Annual Report:

• Number of notices provided to contractors, and
• Number of permit filings under the CT CGP, including project name, location, and date.
6.0 MCM#5 – POST-CONSTRUCTION RUNOFF CONTROL

6.1 OVERVIEW

**Goal:**

- Mitigate the long-term impacts of new and re-development projects on water quality through proper use of low impact development and runoff reduction practices.

This MCM is aimed at using post-construction stormwater controls to protect water quality through stormwater treatment and impact minimization methods.

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 in the table below; namely, the following:

- 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.

Compliance for elements of this MCM and its BMPs would need to be reviewed with public safety and security in mind and may be limited. The permit requirements are discussed herein, with the understanding that 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.

6.2 BEST MANAGEMENT PRACTICES

6.2.1 Summary of BMPs for MCM#5

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-1</td>
<td>Establish and/or update legal authority and guidelines regarding LID and Runoff Reduction in Site Development Planning</td>
<td>7/1/22</td>
<td>Annually once implemented</td>
<td>Establish written protocols, Number of projects reviewed</td>
</tr>
<tr>
<td>5-2</td>
<td>Enforce LID/Runoff Reduction Requirements for Development and Redevelopment Projects</td>
<td>N/A See MCM 5-1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6.2.2 BMP Descriptions

6.2.2.1 BMP 5-1: Legal Authority/Guidelines for LID/Runoff Reduction

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.

To meet this required BMP, CT DOC will develop and circulate a written policy by July 1, 2022, to document procedures required within its own operations to consider the use of LID and runoff reduction practices in project planning which would meet or exceed those identified in the *CT Stormwater Manual* and will meet the standards identified in the General Permit to the extent practical, with safety and security standards in mind.

The policy will include the following standards required by the General Permit and will describe these in detail using language from the General Permit to the extent that CT DOC can meet these requirements with considerations for safety and security:

1) For redevelopment of sites that are currently developed with Directly Connected Impervious Area (DCIA) of forty percent or more, retain on-site half the water quality volume for the site, or
2) For new development and redevelopment of sites with less than forty percent DCIA, retain the water quality volume for the site, or


The policy will also indicate that the six (6) watershed protection elements cited in the General Permit (Sections 6(5)(A)(i)(a-f)) will be considered to manage stormwater impacts from development and redevelopment on receiving waters. These six watershed protection elements are summarized as follows:

1. Minimize the amount of impervious surfaces,
2. Preserve, protect, restore, and create ecologically sensitive areas that provide water quality benefits and serve critical watershed functions,
3. Implement stormwater management practices that prevent or reduce thermal impacts to streams and disconnecting impervious cover,
4. Avoid or prevent hydromodification of streams and water bodies,
5. Implement standards to protect trees and vegetation, and
6. Implement policies to protect native soils, stripping of topsoil, and compaction of soils.

**Recordkeeping and Reporting**

CT DOC will finalize and date the final policy and include it with this SMP. Annual progress toward this will be documented in each Annual Report. Records kept will include number of projects reviewed each year once the final policy is established.

### 6.2.2.2 BMP 5-2: Enforce LID/Runoff Reduction Requirements

Since CT DOC is the only entity which will propose and review projects, this BMP is not applicable, as it would be covered by BMP 5-1. This BMP is part of CT DEEP’s mandatory numbering system, so it was maintained, with justification included in this SMP.

**Recordkeeping and Reporting**

Records will be kept as part of BMP 5-1.

### 6.2.2.3 BMP 5-3: Long-Term Maintenance Plan for Basins/Structures

The CT DOC will identify all retention or detention ponds and stormwater treatment structures located in Urbanized Area and those catchment areas of the MS4 with either DCIA of greater than 11% or which discharge to impaired waters and which discharge to, or receive stormwater from, its MS4. CT DOC will prepare narrative long-term maintenance plans for each structure or type of structure which at a minimum will include annual inspection and removal of solids and pollutants when they reach 50% of the design capacity, and to begin implementation of those plans by July 1, 2020.

**Recordkeeping and Reporting**

The plan document will be appended to this SMP and dated, with this information documented in the applicable Annual Report. Thereafter, the SMP will be used to track the following for inspections, which will be included in each Annual Report:
6.2.2.4  **BMP 5-4: DCIA Mapping/Calculation**

As part of this SMP, the CT DOC has prepared a written methodology for the review and calculation of the DCIA that contributes stormwater runoff to each of its MS4 outfalls (catchment areas) based on General Permit requirements.

Once this initial calculation is completed, updates to the DCIA calculation will be documented as development, redevelopment, or retrofit projects add or remove DCIA from the MS4.

**Methodology:**

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:

\[
0.1 \times (\text{IC\%})^{1.5} = \% \text{ DCIA}
\]

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.

**Recordkeeping and Reporting**

All calculations and work for this task will be maintained with the SMP. For each Annual Report, the following will be identified:

- Progress on the calculations
- Total amount of DCIA
- Any DCIA added/removed will be identified
Since the Draft SMP, the Hartford and York facilities were determined not to discharge directly to impaired waters. As such, CT DOC does not have any facilities subject to this requirement and this BMP will no longer be included.

**Recordkeeping and Reporting**

In the initial Annual Report, DOC will indicate this BMP is not required because there are no direct discharges to impaired waters.
7.0 **MCM#6 – POLLUTION PREVENTION/GOOD HOUSEKEEPING**

7.1 **OVERVIEW**

**Goal:**
- Prevent or reduce pollutant runoff as a result of institutional/departmental operations.

This MCM focuses on the use of training and procedures in CT DOC’s day-to-day operations to improve stormwater pollution prevention.

7.2 **BEST MANAGEMENT PRACTICES**

7.2.1 **Summary of BMPs for MCM#6**

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-1</td>
<td>Develop/Implement Employee Training Program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19</td>
<td>Number of staff trained annually</td>
</tr>
<tr>
<td>6-2</td>
<td>Implement MS4 property and operations maintenance</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Written plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/17-6/22</td>
<td>Quantities of chemicals and leaves, number of floor drains, vehicles, etc.</td>
</tr>
<tr>
<td>6-3</td>
<td>Implement coordination with interconnected MS4s</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>4/17</td>
<td>Transmit information to MS4s</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/17-6/22</td>
<td># of communications per year</td>
</tr>
<tr>
<td>6-4</td>
<td>Develop/implement program to control other sources of pollutants to MS4</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Plan developed</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/17-6/22</td>
<td>Number of sources, number of contacted parties</td>
</tr>
<tr>
<td>6-5</td>
<td>Evaluate additional measures for discharges to impaired waters – no longer applicable based on mapping reviews in summer 2017 – no direct</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Written Geese Plan and Actions taken – no longer applicable based on mapping – no discharges to impaired waters</td>
</tr>
<tr>
<td>BMP ID</td>
<td>BMP</td>
<td>Responsible Party/Job Title</td>
<td>Implementation Timeline</td>
<td>Measurable Goal(s)</td>
</tr>
<tr>
<td>--------</td>
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<td>-----------------------------</td>
<td>------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>6-6</td>
<td>Track projects that disconnect DCIA</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Acres of DCIA disconnected</td>
</tr>
<tr>
<td>6-7</td>
<td>Develop/implement infrastructure repair/rehab program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>Number of conveyances, structures, outfalls identified for modifications</td>
</tr>
<tr>
<td>6-8</td>
<td>Develop/implement plan to identify/prioritize retrofit projects</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>Number of sites identified &amp; total DCIA disconnected</td>
</tr>
<tr>
<td>6-9</td>
<td>Develop/implement street sweeping program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/18</td>
<td>Written Plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4/1/19-4/1/23</td>
<td>Document in Annual Report: inspection results, curb-miles swept, amount of material collected</td>
</tr>
<tr>
<td>6-10</td>
<td>Develop/implement catch basin (CB) cleaning program</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>4/1/19</td>
<td>Plan/schedule for CB inspection</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/1/20</td>
<td>100% catch basins inspected in UA/Priority Areas</td>
</tr>
<tr>
<td>6-11</td>
<td>Develop/implement snow management practices</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/17</td>
<td>Written Plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/17-6/22</td>
<td>Amount of deicing chemicals/sand, # of personnel trained, number of lane-miles treated</td>
</tr>
</tbody>
</table>

### 7.2.2 BMP Descriptions

#### 7.2.2.1 BMP 6-1: Develop/Implement Employee Training Program

By July 1, 2019, CT DOC will develop and implement a program, including procedures and training materials to provide topical training to relevant CT DOC staff regarding standard operating procedures and other activities necessary to comply with the provisions of the General Permit, including an awareness of the general goals and objectives of the SMP, identification and reporting of illicit discharges and improper disposal, and spill response protocols and respective responsibilities of involved personnel.
Recordkeeping and Reporting

The dated training program will be appended to this SMP and documented in the Annual Report. The number of personnel trained and topics covered, with dates of annual training conducted will be filed with the SMP and documented in each Annual Report.

7.2.2.2  **BMP 6-2: Implement MS4 Property and Operations Maintenance**

CT DOC will develop written operations maintenance programs per the requirements of the General Permit by July 1, 2017, for (managed) Open Space, waterfowl management, buildings and facilities, vehicles and equipment, and leaf management. Pet waste management is only applicable to service animals (K-9 units). The written procedures will be developed to meet the specific requirements stated in the MS4 General Permit.

Recordkeeping and Reporting

Information to be recorded and maintained with the SMP and reported in the Annual Reports will include, but not be limited to the following:

- Document locations of managed open space
- Track type, dates of, and quantity of fertilizers, pesticides, and herbicides placed in open space areas.
- Track quantities of petroleum and non-petroleum products disposed.
- Identify building floor drains – track number of floor drains and documentation that they are not connected to the MS4.
- Track number of facility vehicles and where they are parked, if indoor or outdoor.
- Track locations of fueling areas and fuel quantities delivered annually.
- Track quantities of leaves collected.

7.2.2.3  **BMP 6-3: Implement Coordination with Interconnected MS4s**

For this BMP, CT DOC will coordinate with operators of interconnected MS4s regarding the following:

- Contribution of potential pollutants from storm sewer systems,
- Contributing land use areas,
- Stormwater control measures in their MS4s, and
- Operation and maintenance procedures in their MS4s.

Based on a preliminary review, the following interconnections exist. These will constitute the parties which need coordination under the General Permit. As required by the General Permit, this coordination will include CT DOC submitting a copy of CT DOC’s registration and all attachments to the interconnected MS4 (municipality or CT DOT).

The following interconnections were identified on the registrations for CT DOC facilities subject to the MS4:

1. Carl Robinson Correctional Institution – CT DOT
2. Cheshire Correctional Institution – CT DOT, Town of Cheshire
3. Hartford Correctional Center – City of Hartford/Metropolitan District Commission (MDC)
4. York Correctional Institution – CT DOT, Town of East Lyme

It should be noted that this assessment is based on preliminary available information and limited mapping and may be updated during the course of the permit term, as more information becomes available.

Since the initial draft document, mapping and field investigation work has indicated that Carl Robinson, Cheshire, and York do not discharge to CT DOT’s MS4, and that York also does not discharge to the Town of East Lyme’s MS4.

**Recordkeeping and Reporting**

Records to be maintained with the SMP and provided in Annual Reports includes:

- Records of transmittal of information to interconnected MS4s
- Records of phone calls, meetings or other communications, including date, personnel, and topics discussed, conclusions, etc.

### 7.2.2.4 BMP 6-4: Develop/Implement Plan to Control Other Pollutant Sources

CT DOC will develop a written plan to identify if there are other sources of pollutants to their MS4 Facilities. If other sources are identified, CT DOC will notify the responsible party.

**Recordkeeping and Reporting**

CT DOC will include the final dated plan in the SMP. CT DOC will maintain and report records in the Annual Report, including date and area of assessment, observed condition, and assumed responsible party, as well as any correspondence to notify the party.

### 7.2.2.5 BMP 6-5: Additional Measures for Discharges to Impaired Waters

Since the Draft SMP, mapping and field investigation efforts indicated that there are no direct discharges to impaired waters from the six DOC facilities. As such, this BMP does not apply.

**Recordkeeping and Reporting**

In the initial Annual Report, DOC should indicate that further review has indicated no direct discharges to impaired waters exist for the six properties and as such, this BMP is not applicable.

### 7.2.2.6 BMP 6-6: Track Projects that Disconnect 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.
CT DOC will track changes in DCIA as a result of projects for each facility.

**Recordkeeping and Reporting**

CT DOC will assess each year whether there have been changes in the DCIA for each of the six MS4 Facilities and report this in the Annual Reports.

### 7.2.2.7 BMP 6-7: Develop/Implement Infrastructure Repair/Rehab Program

CT DOC will develop a written plan by July 1, 2020, to plan and implement repair/rehabilitation/retrofit projects, by identifying conveyances, structures, and outfalls in need of repair, replacement, or upgrading based on information collected and observed during outfall mapping/monitoring.

**Recordkeeping and Reporting**

The dated plan will be appended to the SMP and reported in the applicable Annual Report. Since this listing of features needing repair will change over time, new structures added to the list and those which were repaired/replaced each year will be recorded in the SMP and reported.

### 7.2.2.8 BMP 6-8: Develop/Implement Plan to Identify/Prioritize Retrofit Projects

By the end of the third permit year (July 1, 2020), CT DOC will review the potential for retrofit projects and document what sites/projects could be feasible in accordance with the requirements of the General Permit. If retrofits are not feasible for security/safety/code reasons, this will be documented. If the DCIA removal/retrofit program requirements of the General Permit will not be met in the permit term, this will be recorded and reported to CT DEEP.

**Recordkeeping and Reporting**

Starting in year 3 (July 1, 2020), CT DOC will record in the SMP and document in the Annual Reports progress on a retrofit program, feasibility of the program based on safety/security, and progress toward meeting the General Permit goals for this BMP.

### 7.2.2.9 BMP 6-9: Develop/Implement Street Sweeping Program

CT DOC will develop and implement procedures by July 1, 2018, for the inspection and sweeping of CT DOC-owned streets, driveways, and parking lots, whether or not they are in the UA or a priority area. Sweeping frequency will be at a minimum once per year in the spring, following the cessation of winter salting/sanding activities for that season. CT DOC will identify targeted areas for additional sweeping that have increased pollutant potential based on the presence of construction activity or other potential pollutant sources determined based on surface inspections, catch basin cleaning or inspection results, land use, winter road deicing and/or sand application, presence of impaired/TMDL waters, or other relevant factors as determined by CT DOC.

Disposal of street sweepings will be in accordance with applicable policies, guidance, and regulations. CT DOC will adopt CT DEEP’s guideline entitled “Guideline for Municipal Management Practices for Street Sweepings & Catch Basin Cleanings”.

**Recordkeeping and Reporting**

The following will be kept with the SMP and documented in the appropriate Annual Reports:
7.2.2.10  **BMP 6-10: Develop/Implement Catch Basin Cleaning Program**

CT DOC will inspect all CT DOC-owned catch basins within Urbanized Area and Priority Areas at least once by July 1, 2020. Based on available mapping at the time of this SMP, all portions of the six facilities are completely within UAs.

CT DOC will prioritize inspection and maintenance of catch basins located near impaired waters and construction activities and clean these structures more often if inspection and maintenance indicate excessive loadings. CT DOC will establish and implement a schedule for routine cleaning of catch basins such that no catch basin sump will be more than 50% full when cleaned. For catch basins determined to be more than 50% full during two consecutive inspections/cleanings, CT DOC will investigate and abate contributing sediment sources.

Disposal of catch basin cleanings will be in accordance with applicable policies, guidance, and regulations. CT DOC will adopt CT DEEP’s guideline entitled “Guideline for Municipal Management Practices for Street Sweepings & Catch Basin Cleanings”.

**Recordkeeping and Reporting**

The following will be kept with the SMP and documented in the appropriate Annual Reports:

- Dated policy incorporating CT DEEP Guideline as Standard Operating Procedure for CT DOC
- Schedule and plan for optimizing catch basin cleaning (in first Annual Report)
- Actions taken for catch basins with excessive observed sedimentation
- Total number of catch basins
- Log of catch basins cleaned (number and percentage)
- Volume/mass of material collected, separated out with quantity from catchments draining to water quality limited waters
- Method of reuse/disposal

7.2.2.11  **BMP 6-11: Develop/Implement Snow Management Practices**

CT DOC will develop and implement standard operating practices for the use, handling, storage, application, and disposal of deicing products such as sand and salt, with the goal of minimizing exposure to stormwater, minimizing the use and optimizing the application of deicing materials, considering alternative deicers, and providing secondary containment for liquid products. CT
DOC intends to adopt CT DEEP’s policy entitled “Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots” with additional information provided, as needed to satisfy the General Permit requirements.

CT DOC will provide training for staff and/or private contractors on deicing application procedures, equipment, types of deicers used, and this policy.

**Recordkeeping and Reporting**

CT DOC will record the following and append it to the SMP and provide this information in Annual Reports:

- Document secondary containment in accordance with the General Permit for liquid deicers onsite (if none, state this is not applicable in the first Annual Report)
- Dated policy adopting CT DEEP BMP document and any additions needed for General Permit compliance
- Dated memo providing review of potential for use of alternative deicers
- Dates of training, number of personnel trained, and list of topics discussed
- Lane miles treated
- Total amount of each deicing material used
- Type(s) of deicing equipment used
- Changes in deicing practices and reasoning behind changes
- Snow disposal methods
8.0 MONITORING REQUIREMENTS

8.1 OVERVIEW

This requirement only applies to MS4 facilities with discharges directly to impaired waters. Based on mapping and field investigations in summer of 2017, CT DOC has determined that there are no direct discharges to impaired waters and, as such, the monitoring requirements relative to impaired waters do not currently apply to DOC. This should be documented in the first Annual Report.

8.2 BEST MANAGEMENT PRACTICES

8.2.1 Summary of BMPs for Monitoring Requirements

These BMPs identified in the table below are no longer applicable based on the review of outfalls, since there are no discharges to impaired waters. In the first Annual Report, this should be discussed, indicating that these BMPs will not be addressed during the permit term.

<table>
<thead>
<tr>
<th>BMP ID</th>
<th>BMP</th>
<th>Responsible Party/Job Title</th>
<th>Implementation Timeline</th>
<th>Measurable Goal(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-1</td>
<td>Outfall screening</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/19-7/1/22</td>
<td>Number of outfalls screened</td>
</tr>
<tr>
<td>S-2</td>
<td>Inventory and mapping of discharges to impaired waters</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>Number of outfalls that discharge to impaired waters</td>
</tr>
<tr>
<td>S-3</td>
<td>Follow-up investigations of drainage areas</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/20</td>
<td>Number of investigations and BMPs proposed &amp; implemented</td>
</tr>
<tr>
<td>S-4</td>
<td>Annual monitoring of priority outfalls</td>
<td>CT DOC Facilities Management &amp; Engineering</td>
<td>7/1/21</td>
<td>Number of outfalls for each pollutant of concern</td>
</tr>
</tbody>
</table>
9.0 CERTIFICATION OF DOCUMENTS

9.1 SMP CERTIFICATION BY CT DOC

The SMP must be signed by the principal executive officer as defined in Section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies. The SMP must be retained by the principal executive officer and copies retained by MS4 officials or employees responsible for implementation of the Plan. Accordingly:

"I hereby certify that I am making this certification in connection with a registration under the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4), submitted to the commissioner by Connecticut Department of Correction for an activity located at or within the following CT DOC facilities:

Carl Robinson Correctional Institution          MacDougall Correctional Institution
Cheshire Correctional Institution             Osborn Correctional Institution
Hartford Correctional Center                  York Correctional Institution

and that all terms and conditions of the general permit are being met for all discharges which have been initiated and such activity is eligible for authorization under such permit. I further certify that a system is in place to ensure that all terms and conditions of this general permit will continue to be met for all discharges authorized by this general permit at the site. I certify that the registration filed pursuant to this general permit is on complete and accurate forms as prescribed by the commissioner without alteration of their text. I certify that I have personally examined and am familiar with the information that provides the basis for this certification, including but not limited to all information described in Section 3(b)(8)(A) of such general permit, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining such information, that the information upon which this certification is based is true, accurate and complete to the best of my knowledge and belief. I certify that I have made an affirmative determination in accordance with Section 3(b)(8)(B) of this general permit. I understand that the registration filed in connection with such general permit is submitted in accordance with and shall comply with the requirements of section 22a-430b of Connecticut General Statutes. I also understand that knowingly making any false statement made in the submitted information and in this certification may be punishable as a criminal offense, including the possibility of fine and imprisonment, under section 53a-157b of the Connecticut General Statutes and any other applicable law."

Principal Executive Officer for CT DOC Certification:

Printed Name: Steve Link
Title: Director, FM&E
Signature:  
Date: 8/1/2017

Preparer:

Printed Name: Rosalie Starvish, P.E.
Title: Project Manager
Signature:  
Date: 7/21/2017

Firm: GZA GeoEnvironmental, Inc.
9.2  SMP CERTIFICATION BY QUALIFIED PROFESSIONAL

"I hereby certify that I am a qualified professional engineer, as defined in the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems, I am making this certification in connection with a registration under such general permit, submitted to the Commissioner by CT DOC for an activity located at or within the following CT DOC facilities:

Carl Robinson Correctional Institution  MacDougall Correctional Institution
Cheshire Correctional Institution  Osborn Correctional Institution
Hartford Correctional Center  York Correctional Institution

I have personally examined and am familiar with the information that provides the basis for this certification, including but not limited to all information described in Section 3(b)(9)(A) of such general permit, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining such information, that the information upon which this certification is based is true, accurate and complete to the best of my knowledge and belief. I certify, based on my review of all information described in Section 3(b)(9)(A) of such general permit and on the standard of care for such projects, that I have made an affirmative determination in accordance with Section 3(b)(9)(B) of this general permit. I understand that this certification is part of a registration submitted in accordance with section 22a-430b of Connecticut General Statutes and is subject to the requirements and responsibilities for a qualified professional in such statute. I also understand that knowingly making any false statement in this certification may be punishable as a criminal offense, including the possibility of fine and imprisonment, under section 53a-157b of the Connecticut General Statutes and any other applicable law."

Qualified Professional Certification:

Printed Name: Thomas E. Jenkins, P.E.  Title: Associate Principal
Signature:  Date: 7/21/2017
Firm: GZA GeoEnvironmental, Inc.

9.3  CERTIFICATION OF ADDITIONAL DOCUMENTS

Any document, including but not limited to any notice, information or report, which is submitted to the Commissioner of CT DEEP under the General Permit will be signed by the principal executive officer of CT DOC, and by the individual or individuals responsible for actually preparing such document, each of whom will certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, 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."
10.0 ADDITIONAL INFORMATION/PERMIT REQUIREMENTS

10.1 SMP AVAILABILITY

CT DOC will provide in the registrations due April 3, 2017, the URL where the draft SMP will be available for review and comment. Within thirty (30) days of receipt of the URL, DEEP will post on their website a list of the SMPs submitted and identify the location where the SMP will be available for review. On or before sixty (60) days from April 3, 2017, members of the public may review the SMP and submit written comments to DEEP.

The CT DOC will also make the SMP available online and at a location for public review and comment. The SMP will be available at the CT DOC Central Office, 24 Wolcott Hill Road, Wethersfield, CT 06109. Appointments to review the SMP can be made by contacting Rich Pease at (860) 692-7562 or via e-mail at rich.pease@ct.gov.

Because certain SMP components may contain secure information that cannot be released to the public for security reasons, certain portions of the SMP may be redacted and not be available for public review.

10.2 ANNUAL REPORT AVAILABILITY

CT DOC will publish a public notice on their website each year of the permit term by January 31st (first notice on January 31, 2018), to inform the public of the availability of that year’s Annual Report for review and comment.

The Public Notice for the Annual Report will include the following information and will allow for a 45 day comment period:

- Contact name with phone number, address, and email where comments can be sent.
- URL for website where Annual Report and Plan will be available for public review.

The CT DOC will also make the Annual Report available at a location for public review and comment. From January 31st – March 17th of each year, the Annual Report will be available at the CT DOC Central Office, 24 Wolcott Hill Road, Wethersfield, CT 06109. Appointments to review the Annual Report can be made by contacting Rich Pease at (860) 692-7562 or via e-mail at rich.pease@ct.gov.

Because certain Annual Report components may contain secure information that cannot be released to the public for security reasons, certain portions of the draft Annual Report may be redacted and not be available for public review.

10.3 ADDITIONAL NOTIFICATIONS

The following additional notification requirements apply to this MS4, as discussed earlier in this document. All correspondence and coordination with these entities will be documented in the SMP and Annual Reports:
1. For facilities with interconnections to another MS4 (municipal, institutional, or CT DOT), a copy of the registration and all attachments will be provided by CT DOC to that entity in April 2017.

2. For facilities with discharges within an APA, CT DOC will notify the water company of the availability of the registration and SMP and will provide these documents to the water company upon request.

10.4 RECORD KEEPING AND REPORTING REQUIREMENTS

10.4.1 Retention of Records

All records and information required by the General Permit must be retained on-site at CT DOC for a minimum of five years following the expiration of the Permit, or longer if required by CT DEEP. The Stormwater Management Plan and associated records must be available to the public at reasonable times during regular business hours. Because of security considerations, not all portions of the SMP will be available to the public.

10.4.2 Reporting Requirements

By April 1st of the second year following the effective date of the General Permit (April 1, 2018), and annually thereafter by April 1st, CT DOC must submit an Annual Report electronically to CT DEEP. The report will cover the previous calendar year’s activities.

The Annual Report must include the following:

1) A plan review fee of $375.00;

2) Written discussion which includes the following items:
   a. A listing and brief description (including, where appropriate, the address or latitude and longitude) of all BMPs within each Minimum Control Measure;

   b. Any reporting requirements enumerated in the controls measures sections and subsections of the General Permit and SMP;

   c. An implementation schedule for each BMP and an indication of whether or not the BMP or any portion of the BMP was scheduled to be implemented during the year covered by the Annual Report;

   d. The status of implementation for each BMP scheduled to be completely or partially implemented during the year covered by the Annual Report, including an assessment of the appropriateness of the BMP and progress towards achieving the implementation dates and measurable goals for that BMP;

   e. For any portion of a BMP implementation scheduled for the year covered by the Annual Report that was not completed as scheduled, a discussion of the circumstances and reasons for non-implementation, a modified implementation
schedule, and, if necessary, a modified or alternate BMP to replace the BMP not implemented including the rationale for such modification or alternate BMP;

f. The overall status of each of the six categories of the Minimum Control Measures and a discussion of the effectiveness of each category in achieving its goals;

g. A discussion of any changes to personnel responsible for the Plan or BMP implementation;

h. A description of any new BMPs added to the Plan during the year including a description of the BMP, the reason or rationale for adding the BMP, the timeline for implementation, the party responsible for implementation and the measurable goal for the BMP and, where appropriate, the location for each BMP, including the address and latitude and longitude;

i. A discussion of the progress and status of the MS4’s IDDE program including outfall screening, mapping, drainage area evaluation and prioritization, illicit discharge tracking activities, IDDE field monitoring results, number and type of illicit discharges detected, and number of illicit discharges eliminated;

j. A discussion of measures included in the Plan for the control of discharges to impaired waters including a list of BMPs in the Minimum Control Measures that are targeted for such discharges, progress in implementing these measures, any evaluation of the effectiveness of these measures in meeting the goals of the Plan’s impaired waters program, and any new or modified BMPs to be added to the Plan to improve its effectiveness (It should be noted that since the Draft SMP, mapping and field review have indicated that there are no direct discharges to impaired waters, which should be documented in the first Annual Report, indicating that requirements relative to impaired waters do not apply to the facilities);

k. A discussion of the MS4’s stormwater monitoring program describing the status of monitoring for the year of the report, the overall status of the monitoring program, a summary of the findings, any significant observations regarding the results, any modifications to the Plan as a result of the monitoring results; and

l. A discussion of any planned BMP implementation in the coming year, including a discussion of any new or modified BMPs planned for future implementation.

3) All monitoring data collected and analyzed pursuant to General Permit requirements.

4) All other information collected and analyzed, including data collected under the Illicit Discharge Detection Protocol and in accordance with the IDDE Plan (once developed and implemented), during the reporting period.

10.5 AMENDMENT OF THE SMP

CT DOC will amend the Plan whenever:

Stormwater Management Plan - CT Department of Correction
1) There is a change which has the potential to cause pollution of the waters of the state; or
2) The actions required by the Plan fail to prevent pollution of the waters of the state or fail to otherwise comply with any other provision of this General Permit; or
3) The Commissioner of DEEP requests modification of the Plan.

The amended Plan shall be completed and all actions required by such Plan shall be completed within a time period determined by the Commissioner of DEEP.

If the population of other CT DOC facilities exceeds the threshold of 1,000 in the future, CT DOC will complete a new registration for that facility and amend the SMP to reflect such changes. If facilities ineligible for the permit due to their discharges to a combined sewer system rather than a separate storm sewer system have a change in their discharge or interconnection such that the discharge will be to a separate storm sewer system, that facility will complete a registration and the SMP will be amended.

10.6 SHARING RESPONSIBILITY

10.6.1 Qualifying Local Program

In accordance with the General Permit, CT DOC may utilize efforts of a third party’s Qualifying Local Program (QLP) to meet the requirements of a MCM. Each QLP must be noted in the registration, SMP, and Annual Reports and if the third party fails to implement the BMP, CT DOC remains responsible for implementation. At this time, CT DOC is not planning to use a QLP.

10.6.2 Qualifying State or Federal Program

Under the General Permit, a Qualifying State or Federal Program can be used if a BMP is to be performed by a third party under another NPDES Stormwater Permit. CT DOC must reference any such programs within its SMP. In this case, CT DOC would not be responsible for implementing the BMP. At this time, CT DOC is not planning to use a Qualifying State or Federal Program.

10.7 DUTY TO CORRECT AND REPORT VIOLATIONS

Upon learning of a violation of a condition of the General Permit, CT DOC will immediately take all reasonable action to determine the cause of such violation, correct and mitigate the results of such violation and prevent further such violation. CT DOC will report in writing such violation and such corrective action to the Commissioner of CT DEEP within five (5) days of learning of such violation. Such information shall be filed in accordance with the certification requirements prescribed in the General Permit.

10.8 DUTY TO REPORT INFORMATION AND CORRECT INACCURACIES

If the Commissioner of CT DEEP requests any information pertinent to the authorized activity or to compliance with the General Permit or with CT DOC’s authorization under the General Permit, CT DOC will provide such information within thirty (30) days of such request. Such information shall be filed in accordance with the certification requirements prescribed in the General Permit.

The Commissioner of DEEP may notify the permittee in writing at any time that the Plan does not meet one or more of the requirements of this General Permit. Within thirty (30) days of such
notification, unless otherwise specified by the Commissioner in writing, the permittee shall respond to the Commissioner indicating how they plan to modify the Plan to address these requirements. Within ninety (90) days of this response or within one hundred twenty (120) days of the original notification, whichever is less, unless otherwise specified by the Commissioner in writing, the permittee shall then revise the Plan, perform all actions required by the revised Plan, and shall certify to the Commissioner that the requested changes have been made and implemented. The permittee shall provide such information as the Commissioner requires to evaluate the Plan and its implementation. If at any time the Commissioner finds that the Plan is not adequate to protect the waters of the state from pollution, the Commissioner may terminate authorization under this General Permit and require the permittee to submit an individual permit application.

If the Commissioner requests submittal of the Plan for review, CT DOC must submit the Plan with a plan review fee of $375.

Within fifteen days after the date CT DOC becomes aware of a change in any information in any material submitted pursuant to the General Permit, or becomes aware that any such information is inaccurate or misleading or that any relevant information has been omitted, CT DOC shall correct the inaccurate or misleading information or supply the omitted information in writing to the Commissioner of CT DEEP. Such information shall be filed in accordance with the certification requirements prescribed in the General Permit.

10.9 COMMUNICATIONS

All questions, comments, or relevant information regarding the General Permit registration, SMP, Annual Reports, and program may be submitted to the CT DOC Facilities Management and Engineering using the following contact information:

State of Connecticut Department of Correction
Facilities Management and Engineering
24 Wolcott Hill Road
Wethersfield, CT 06109

Contact: Richard Pease
Phone: 860-692-7562
APPENDIX A

General Permit Registrations for Facilities
APPENDIX C

Adopted Policies, Procedures

(To Be Inserted when Approved and Circulated)