

MS4 General Permit
 Carl Robinson Correctional Institution 2017 Annual Report
 New MS4 Permittee
 April 1, 2017 – December 31, 2017

This report documents the Carl Robinson Correctional Institution efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from April 1, 2017 to December 31, 2017.

Part I: Summary of Minimum Control Measure Activities

1. Public Education and Outreach

1.1 BMP Summary

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

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

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

2. Public Involvement/Participation

2.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-1 Comply with public notice requirements for the Stormwater Management Plan	Complete	Public notice posted on internet web page	Public notice for SMP	CT DOC Facilities Management and Engineering	Apr 3, 2017	Apr 3, 2017	
2-2 Comply with public notice requirements for Annual Reports	Complete	Public notice posted on internet web page	Public notice for Annual Report	CT DOC Facilities Management and Engineering	Feb 15, 2018	Feb 15, 2018	

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

Continue to make the SMP available on-line and at a location for public review.
 Continue to make the annual report available on-line and at a location for public review.
 Continue to comply with Annual Report public notice requirements.

2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	Y	4/3/17	24 Wolcott Hill Rd, Wethersfield http://www.ct.gov/doc/cwp/view.asp?a=1502&Q=591480
Availability of Annual Report announced to public	Y	2/15/18	24 Wolcott Hill Rd, Wethersfield http://www.ct.gov/doc/cwp/view.asp?a=1502&Q=591480

3. Illicit Discharge Detection and Elimination

3.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department/Person Responsible	Due	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	In progress	<p>GZA has prepared a comprehensive written Illicit Discharge Detection and Elimination (IDDE) Program applicable to the locations and areas classified as Priority Areas in the SMP. The written IDDE Program will include procedures and schedules for development and implementation of the following components:</p> <ul style="list-style-type: none"> • Legal Authority to prohibit and eliminate illicit discharges • Statement of IDDE Program Responsibilities • Assessment and Priority Ranking of Catchments • Outfall and Interconnection Screening and Sampling <ul style="list-style-type: none"> o Sample collection, use of field kits, 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/SSO Removal and Confirmation • Follow-up Screening • Illicit Discharge Prevention Procedures 	Written IDDE Program	CT DOC Facilities Management and Engineering	Jul 1, 2019		<p>Attended IDDE workshop</p> <p>Template posted on UConn website</p>
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	Complete	<p>GZA has developed a comprehensive list (in Microsoft Excel format) and maps (min 1"=2000', max 1"=100') of stormwater discharge (outfall) locations and interconnections utilizing available DOC facility drainage maps.</p>	List and Maps of Outfalls	CT DOC Facilities Management and Engineering	Jul 1, 2020	12/29/17	

Maps which are available in paper only (Bridgeport, Carl Robinson, MacDougall, and Osborn) will be scanned by GZA and locations of outfalls and interconnections digitized using ArcGIS. Latitude/longitude will be identified using ArcGIS.

The maps and listing include the following information:

- Type, material, size, and location (latitude and longitude) of conveyance, outfall, or channelized flow,
- Name, water body ID and Surface Water Quality Classification of the immediate surface water body or wetland to which the outfall eventually discharges,
- If the outfall does not discharge directly to a named water body, the name and water body ID of the nearest named water body 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.

Building upon the list and mapping GZA will conduct field investigations to confirm outfall and interconnection locations identified on the available mapping, and to potentially identify outfall locations not previously mapped. To the extent practical, the outfall mapping investigations will be performed in parallel with field screening investigations of each outfall and interconnection to confirm/identify the following information:

- Unique identifier,
- Receiving water,
- Outfall type,
- Date of most recent inspection,
- Dimensions/size,
- Shape,
- Material,
- Spatial location (latitude, longitude),
- Physical condition, and
- Indicators of potential non-stormwater discharges.

3-3 Implement citizen reporting program	In progress	The Citizen Reporting Program has been outlined in the Draft IDDE Plan prepared by GZA.	Posting of program information, Number of reports, illicit discharges identified and corrected	CT DOC Facilities Management and Engineering	Jul 1, 2019	Website, email, phone number
3-4 Establish legal authority to prohibit illicit discharges	In progress	Establishing Legal Authority has been outlined in the Draft IDDE Plan prepared by GZA.	Establish written procedures	CT DOC Facilities Management and Engineering	Jul 1, 2019	Checklist and sample ordinance posted on UConn website
3-5 Develop record keeping system for IDDE tracking	In progress	The IDDE Tracking Recordkeeping System has been outlined in the Draft IDDE Plan prepared by GZA.	Number of illicit discharges removed	CT DOC Facilities Management and Engineering	Jul 1, 2019	
3-6 Address IDDE in areas with pollutants of concern	NA	NA			Not specified	

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

Review and comment on the Draft IDDE Plan prepared by GZA and finalize the Plan.

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

Date of Report	Location / suspected source	Response taken
NA	NA	NA

3.4 Provide a record of illicit discharges occurring during the reporting period and SSOs occurring July 2012 through end of reporting period using the following table.

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

None Reported

/ Responsible party

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

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

3.6 Provide a summary of actions taken to address septic failures using the table below.

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known
NA		

3.7 IDDE reporting metrics

Metrics

Estimated or actual number of MS4 outfalls	6
Estimated or actual number of interconnections	0
Outfall mapping complete	100%
Interconnection mapping complete	100%
System-wide mapping complete (detailed MS4 infrastructure)	100%
Outfall assessment and priority ranking	100%
Dry weather screening of all High and Low priority outfalls complete	NA for this report year
Catchment investigations complete	NA for this report year

Estimated percentage of MS4 catchment area investigated

NA for this report
year

3.8 Briefly describe the IDDE training for employees involved in carrying out IDDE tasks including what type of training is provided and how often is it given (minimum once per year).

Annual IDDE training will be made available to all employees involved in the IDDE program. This training will, at a minimum, include information on how to identify illicit discharges and SSOs and may also include additional training specific to the functions of particular personnel and their function within the framework of the IDDE program. The training will be incorporated into other currently available on-line training (hazardous waste, oil spill plan) programs.

4. Construction Site Runoff Control

4.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MS4 general permit	Not started	Requirements for implementation have been outlined in the SMP prepared by GZA	Establish written procedures	CT DOC Facilities Management and Engineering	Jul 1, 2020		
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	In progress	Requirements for implementation have been outlined in the SMP prepared by GZA	Written interdepartmental coordination procedures	CT DOC Facilities Management and Engineering	Jul 1, 2017		
4-3 Review site plans for stormwater quality concerns	Complete	No site plan reviews during report year	Number of site plan reviews	CT DOC Facilities Management and Engineering	Jul 1, 2017	12/31/17	
4-4 Conduct site inspections	Complete	No construction developments during the report year	Number of site inspections	CT DOC Facilities Management and Engineering	Jul 1, 2017	12/31/17	

4-5 Implement procedure to allow public comment on site development	In progress	No site development projects during the report year	Established policy Number of public comments	CT DOC Facilities Management and Engineering	Jul 1, 2017
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	In progress	No construction or site development projects during the report year	Established policy Number of projects CGP	CT DOC Facilities Management and Engineering	Jul 1, 2017

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

4-2 Finalize procedure for interdepartmental coordination in site plan review and approval.

4-5 Finalize procedure to allow public comment on site development.

4-6 Using Town of Tolland State Permit Notification as a model, finalize a procedure to notify developers about DEEP construction stormwater permit.

5. Post-construction Stormwater Management

5.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	Not started	Began to gather available guidance documents from DEEPs website: CT Guidelines for Soil Erosion and Sediment Control. Technical Memorandum 4, LID Guidelines and Standards (Fuss & O'Neill 2010). LID Appendix to CT Guidelines for Soil Erosion and Sediment Control (Fuss & O'Neill 2011). LID Appendix to the CT Stormwater Quality Manual (Fuss & O'Neill 2011).	Establish written protocols Number of project reviewed	CT DOC Facilities Management and Engineering	Jul 1, 2022		

5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects		NA See MCM 5-1			Jul 1, 2022	
5-3 Identify retention and detention ponds in priority areas	Complete	Retention and detention ponds were identified by GZA through field investigations and system mapping	Retention and detention ponds identified through field investigations and system mapping	CT DOC Facilities Management and Engineering	Jul 1, 2020	12/29/17
	In progress	GZA has developed long term maintenance plans for ensuring the effectiveness of retention or detention ponds and applicable stormwater treatment structures or measures that are located within Priority Areas	Establish written long-term maintenance plans and begin implementation. Track annual inspections including structures inspected, date, inspection results, and maintenance performed.	CT DOC Facilities Management and Engineering	Jul 1, 2020	
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures						
5-5 DCIA calculations	Complete	Established written methodology in SMP and performed initial DCIA calculations	Established written methodology in SMP and performed initial DCIA calculations.	CT DOC Facilities Management and Engineering	Jul 1, 2020	12/15/17
	NA					
5-6 Address post-construction issues in areas with pollutants of concern					Not specified	

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

5-4 Finalize long-term maintenance plan for stormwater basins and treatment structures.

5.3 Post-Construction Stormwater Management reporting metrics

Metrics

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

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

- 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. 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.

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

CT DOC intends to use the methodology and criteria provided by CT DEEP for its preliminary calculations, which will be completed by July 1, 2020. The Impervious Surface Analysis Tool (ISAT), which is a Geographic Information System (GIS) extension, will be used to estimate impervious surface area using land cover and coefficients which are tied to the land cover dataset. The coefficients will be used with the Connecticut Land Cover 2002 data available online. The tool is used to calculate the percent of impervious surface area of a selected geographic area (in this case, on a catchment basis). ISAT was developed by NEMO (Nonpoint Education for Municipal Officials) and the National Oceanic and Atmospheric Administration (NOAA) Coastal Services Center. This tool will be used for each catchment to an MS4 outfall. The CT DEEP criteria offered two options for calculating DCIA from impervious cover

percentages. Review of these two options suggested that Option 1 was more appropriate at the time of SMP development, based on the limited information available. The Option 1 equation is as follows and will be used for each outfall and associated catchment area, where IC is the abbreviation for Impervious Cover:

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

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

6. Pollution Prevention/Good Housekeeping

6.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-1 Develop/implement formal employee training program	Not started		Number of staff trained annually	CT DOC Facilities Management and Engineering	Jul 1, 2019		The training will be incorporated into other currently available on-line training (hazardous waste, oil spill plan) programs.
	In progress	Adopted DEEP BMPs for grass clippings, mowing techniques, fertilizer application, and watering practices Completed procedure for geese management.	Written plan Quantities of chemicals and leaves, number of floor drains, vehicles, etc.	CT DOC Facilities Management and Engineering		2/5/18 2/5/18	
6-2 Implement MS4 property and operations maintenance		Adopted DEEP BMPs for grass clippings, mowing techniques, fertilizer application, and watering practices Adopted DPH BMPs for dumpsters. Included SMP for York aquifer protection area. Adopted DEEP guidance for vehicles and equipment. Comply with vehicle maintenance wastewater discharge General Permit requirements.			Jul 1, 2018	2/5/18	

		Addressed the outside washing of vehicles.				
6-3 Implement coordination with interconnected MS4s	Complete	Registration copies provided to Town of Cheshire, Town of East Lyme, MDC (Hartford). Letter to Town of East Lyme included notification of SMP.	Transmit information to MS4s # of communication per year Plan developed	CT DOC Facilities Management and Engineering	4/3/17	Not specified
6-4 Develop/implement program to control other sources of pollutants to the MS4	Not started		Number of sources, number of contacted sources	CT DOC Facilities Management and Engineering		Not specified
6-5 Evaluate additional measures for discharges to impaired waters*	Complete	No discharges to impaired waters	NA	CT DOC Facilities Management and Engineering	7/21/17	Not specified
6-6 Track projects that disconnect DCIA	NA	CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.				Jul 1, 2017
6-7 Develop/Implement infrastructure repair/rehab program	Not started		Number of sites identified	CT DOC Facilities Management and Engineering		Jul 1, 2021

6-8 Develop/implement plan to identify/prioritize retrofit projects	Not started		Number of conveyances, structures, outfalls identified for modifications	CT DOC Facilities Management and Engineering	Jul 1, 2020	
6-9 Implement retrofit projects to disconnect 2% of DCIA	NA	CT DOC and CT DEEP have previously discussed this BMP and agreed that due to requirements for public safety and security, there are development/redevelopment/retrofit limitations, because of the requirement to have specific pavement areas associated with these correctional facilities. As such, opportunities for DCIA disconnection will be limited at the six facilities which comprise CT DOC's MS4. To the extent possible, new development/redevelopment will consider DCIA.			Jul 1, 2022	
6-10 Develop/implement street sweeping program	Not started		Written procedures	CT DOC Facilities Management and Engineering	Jul 1, 2018	
6-11 Develop/implement catch basin cleaning program	Not started		Plan/schedule for CB inspection/cleaning	CT DOC Facilities Management and Engineering	Jul 1, 2020	
6-12 Develop/implement snow management practices	Complete	In addition to DOC policies, adopted DEEP BMPs for snow disposal and CT DOT Winter Highway Maintenance Operations guidance.	Written Plan Amount of deicing chemicals/sand, # of personnel trained, number of lane-miles treated	CT DOC Facilities Management and Engineering	Jul 1, 2018	2/5/18

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

Develop leaf management procedure.

Develop/implement program to control other sources of pollutants to the MS4.

Develop record keeping for sweeping and snow management.

6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics

Employee training provided for key staff	NA for this report year
Street sweeping	
Curb miles swept	NA for this report year
Volume (or mass) of material collected	NA for this report year
Catch basin cleaning	
Total catch basins in priority areas	68
Total catch basins in MS4	68
Catch basins inspected	NA for this report year
Catch basins cleaned	NA for this report year
Volume (or mass) of material removed from all catch basins	NA for this report year
Volume removed from catch basins to impaired waters (if known)	NA for this report year
Snow management	
Type(s) of deicing material used	NA for this report year
Total amount of each deicing material applied	NA for this report year
Type(s) of deicing equipment used	NA for this report year
Lane-miles treated	NA for this report year
Snow disposal location	NA for this report year
Staff training provided on application methods & equipment	NA for this report year

Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	NA
Reduction in turf area (since start of permit)	NA
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	NA
Cost of mitigation actions/retrofits	NA

6.4 Catch basin cleaning program

Briefly describe the method used to optimize your catch basin inspection and cleaning schedule. [Complete this section for the 2017 Annual Report only]

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”.

6.5 Retrofit program

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

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

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

Part III: Additional IDDE Program Data [NA This section required beginning with 2019 Annual Report]

1. Assessment and Priority Ranking of Catchments data (Appendix B (A)(7)(c) / page 5)

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

1. Catchment ID (DEEP Basin ID)	2. Category	3. Rank
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2. Outfall and Interconnection Screening and Sampling data

2.1 Dry weather screening and sampling data from outfalls and interconnections

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

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

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

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

3.1 System Vulnerability Factor Summary

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

Outfall ID	Receiving Water	System Vulnerability Factors
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Where SVFs are:

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

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

3.2 Key junction manhole dry weather screening and sampling data

Key Junction Manhole ID	Screening / Sample date	Visual/ olfactory evidence of illicit discharge	Ammonia	Chlorine	Surfactants
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3.3 Wet weather investigation outfall sampling data

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants
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3.4 Data for each illicit discharge source confirmed through the catchment investigation procedure

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

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

Chief Elected Official or Principal Executive Officer

Print name:
Steve Link

Signature / Date:

Document Prepared by

Print name:
Rich Pease

Signature / Date: