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Affirmative Action/Equal Opportunity Employer

STATE OF CONNECTICUT:

V

TOWN OF PORTLAND

ORDER No. AO WR SW19001

Date Issued: February 10, 2020

- A. The Commissioner of Energy and Environmental Protection ("the Commissioner") finds:
 - 1. The Town of Portland ("Respondent") is or has been engaged in operating a public works garage and salt storage facility at Route 17 ("PPWG") and operating a Salt and Sand Storage facility at Sage Hollow Road ("PSS") in Portland, Connecticut.
 - 2. Since at least May 6, 2013, Respondent discharged stormwater associated with industrial activity at PPWG and PSS sites and was required to register pursuant to Section 4 of the General Permit for the Discharge of Stormwater Associated with Industrial Activity ("Stormwater General Permit") issued on August 12, 2010, effective October 1, 2011 pursuant to Section 22a-430b of the Connecticut General Statutes.
 - 3. On or about April 7, 2014, Respondent registered to discharge stormwater at the PPWG (GSI002647) and the PSS (GSI002648) sites.
 - 4. The Department of Energy and Environmental Protection ("Department") issued Field Notice of Violation WR SW 14 104 (FNOV WR SW 14 104) to Respondent for violations at the PSS site on July 29, 2014 for failure to:
 - a. adequately prepare a Pollution Prevention Plan ("PPP"),
 - b. provide proper storage of sand/salt, and
 - c. obtain a discharge permit, for the discharge of stone washing associated with mining operations), in violation of Connecticut General Statute 22a-430 and Section 5(b)(11) of the Stormwater General Permit
 - 5. Respondent submitted a response to FNOV WR SW 14 104 in August 2014 which indicated all violations at the PSS site would be addressed by September 30, 2014.
 - 6. On July 16, 2015, staff re-inspected the PSS site to determine if violations had been addressed as stated in the response noted in paragraph A.5. above. During this inspection, staff again observed unauthorized stonewashing and improper sand/salt storage.

- 7. On October 3, 2017, staff inspected both the PPWG and PSS sites and again, observed violations of the Stormwater General Permit.
- 8. Staff issued Field Notice of Violation No. FNOV WR SW 17-126 on October 3, 2017 to Respondent for the PPWG site for the inspection identified in paragraph A.7., for the following:
 - a. improper sand/salt storage,
 - b. failure to conduct stormwater inspections,
 - c. failure to conduct stormwater training and
 - d. failure to update the PPP.
- 9. Staff issued Field Notice of Violation No. FNOV WR SW 17-127 on October 3, 2017 to Respondent for the PSS site for the inspection identified in paragraph A.7., for the following:
 - a. improper sand/salt storage,
 - b. failure to conduct stormwater inspections,
 - c. failure to conduct stormwater training and
 - d. failure to update the PPP.
- 10. To date the Department has not received an adequate response to address the violations set forth in paragraphs A.8. and A.9.
- 11. By virtue of the above, the Respondent has created or is maintaining a facility or condition which reasonably can be expected to create a source of pollution to the waters of the state and has violated the Stormwater General Permit issued under Section 22a-430b of the Connecticut General Statutes.
- B. The Commissioner, acting under §22a-6, §22a-424, §22a-425, §22a-428, §22a-430, and §22a-432 of the Connecticut General Statutes orders Respondent as follows:
 - 1. On or before fourteen (14) days from the date of issuance of this order, Respondent shall retain one or more qualified consultants or identify Town of Portland staff acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this order and shall, by that date, notify the Commissioner in writing of the identity of such consultant(s). Respondent shall retain one or more qualified consultants acceptable to the Commissioner until this order is fully complied with, and, within ten (10) days after retaining any consultant other than the one originally identified under this paragraph, Respondent shall notify the Commissioner, in writing, of the identity of such other consultant(s) or Town of Portland staff for the Commissioner's acceptance of said consultant. The consultant(s) or Town of Portland staff retained to implement and oversee the actions required by the Stormwater General Permit and this order shall be a qualified professional engineer(s) licensed to practice in Connecticut with qualifications

acceptable to the Commissioner. Respondent shall submit to the Commissioner a description of the consultant's or Town of Portland staffs' education, experience and training which is relevant to the work required by this order within ten (10) days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.

- 2. On or before thirty (30) days after the issuance of this order, Respondent shall submit for the Commissioner's review and written approval best management practices plan for operation of the current salt storage area located at the PSS site.
- 3. On or before ninety (90) days after the date of issuance of this order, Respondent shall submit for the Commissioner's review and written approval plans and specifications for modifications to the current salt storage area at the PSS site in accordance with Sections 5(b)(12) of the Stormwater General Permit.
- 4. On or before December 31, 2020 with the Commissioner's approval of the plans and specifications required by paragraph B.3. above, Respondent shall fully implement the approved modifications to the current salt storage area at the PSS site and submit written verification of such implementation to the Commissioner.
- 5. On or before one-hundred twenty (120) days after the date of issuance of this order, Respondent shall review its PPP for the PSS and PPWG sites and perform a Comprehensive Site Inspection at each site in accordance with Section 5(d) of the Stormwater General Permit. Respondent shall use the form included in Attachment A to this order ("form") to assist in performing such reviews and inspections.
- 6. Within thirty (30) days after the date Respondent performs each review and inspection required under paragraph B.5., Respondent shall submit, for the Commissioner's review, the completed form, a summary of findings from Respondent's review and inspection, and a discussion of corrective actions required and taken, including any updates or necessary amendments to the PPP for each site in order to make such PPP complete or to otherwise comply with the Stormwater General Permit.
- 7. <u>Full compliance</u>. Respondent shall not be considered in full compliance with this order until all actions required by this order have been completed as approved and to the Commissioner's satisfaction.
- 8. <u>Sampling and sample analyses</u>. All sample analyses, which are required by this order, and all reporting of such sample analyses shall be conducted by a laboratory certified by the Connecticut Department of Public Health to conduct such analyses. All sampling and sample analyses performed under this order shall be performed in accordance with Section 5(e) of the Stormwater General Permit.

- 9. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this order. Nothing in this paragraph shall excuse noncompliance or delay.
- 10. <u>Definitions.</u> As used in this order, "Commissioner" means the Commissioner or a representative of the Commissioner.
- 11. <u>Dates</u>. The date of "issuance" of this order is the date the order is deposited in the U.S. mail or personally delivered, whichever is earlier. The date of submission to the Commissioner of any document required by this order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is deposited in the U.S. mail or is personally delivered, whichever is earlier. Except as otherwise specified in this order, the word "day" as used in this order means calendar day. Any document or action which is required by this order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.
- 12. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this order shall be signed by Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall 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, that the submitted information is true, accurate, and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut

General Statutes and any other applicable law."

- 13. <u>False statements</u>. Any false statement in any information submitted pursuant to this order may be punishable as a criminal offense under Section 53a-157b of the Connecticut General Statutes and any other applicable law.
- 14. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this order, Respondent shall notify the Commissioner in writing no later than fifteen days after transferring all or any portion of the facility, the operations, the site, or the business, which is the subject of this order, or after obtaining a new mailing address. Respondent's obligations under this order shall not be affected by the passage of title to any property to any other person or municipality. Any future owner of the site may be subject to the issuance of an order from the Commissioner.
- 15. Commissioner's powers. Nothing in this order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for past, present, or future violations of law. If at any time the Commissioner, determines that the actions taken by Respondent pursuant to this order have not successfully corrected all violations, fully characterized the extent and degree of any pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondent to undertake further investigation or further action to prevent or abate violations or pollution.
- 16. <u>Respondent's obligations under law</u>. Nothing in this order shall relieve Respondent of other obligations under applicable federal, state, and local law.
- 17. No assurance by Commissioner. No provision of this order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondent pursuant to this order will result in compliance or prevent or abate pollution.
- 18. Access to site. Any representative of the Department of Energy and Environmental Protection may enter the site without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this order.
- 19. No effect on rights of other persons. This order neither creates nor affects any rights of persons or municipalities which are not parties to this order.
- 20. Notice to Commissioner of changes. Within 15 days of the date, Respondent becomes aware of a change in any information submitted to the Commissioner under this order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondent shall submit the correct or omitted information to

the Commissioner.

- 21. Notification of noncompliance. In the event that Respondent becomes aware that it did not or may not comply, or did not comply on time, with any requirement of this order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. Within five (5) days of the initial notice, Respondent shall submit in writing the date, time and duration of the noncompliance and the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondent shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
- 22. <u>Submission of Documents</u>. Any document required to be submitted to the Commissioner under this order shall, unless otherwise specified in this order or in writing by the Commissioner, be directed to:

Emily Anness, Sanitary Engineer 2
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, Connecticut 06106-5127

Issued as an order of the Commissioner of Energy and Environmental Protection.

Betsey Wingfield

Deputy Commissioner

Department of Energy & Environmental Protection

ORDER No. AO WR SW 19001 cc: Town of Portland Land Records

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ATTACHMENT A CONNECTICUT DEPARTMENT OF ENERGY and ENVIRONMENTAL PROTECTION 79 ELM STREET, HARTFORD, CT 06106

General Permit for the Discharge of Stormwater Associated with Industrial Activity
SITE INSPECTION FORM

			1
COMPANY/ SITE NAME:	S.		7.
ADDRESS:			
Permit Number: GSI	e		
CONTACT PERSON & TITLE:	H .	•	* *
TELEPHONE #:	¥1	100	
INSPECTION CONDUCTED BY:			72
DATE AND TIME OF INSPECTION:		8 12	
WEATHER AT THE TIME OF INSPECTION:		(40)	9
SIC Code: SECTOR (if applicable):	11		
	9		
3. Was the Stormwater Pollution Prevention Plan	available o	n site?	1 (0.00
☐ Yes		· .	
☐ No			
Unknown			i
Comments:			
*		El and a series an	
4. Was the Stormwater Pollution Prevention Plan	reviewed d	uring this in	spection?
Yes, see review checklist attached	9		
☐ No		2	
Comments:	11*5		
Comments:		19	* 4.
5. Has the facility sampled?	3);	*	
Yes, met all monitoring requirements	*		
Yes, but exceeded Benchmarks			E.
# of exceedances:			(2
Has the SWPPP been modified to address t	the exceeda	inces?	8
Have improvements onsite been implement	ted:		*= u _n
Provide specific details of methods used to	improve st	tormwater g	uality?
Yes, but missed sampling periods	*		
□ No			
Copies of results on-site?			* *

LAND)RT
	*
8	

Have results been sent into D	EEP?
Comments:	*
Support - 0.00 control	
6. Quarterly Visual Monitoring:	*
Oct. 1, 2011- Sept. 30, 2012	1
Oct. 1, 2012- Sept. 30, 2013	「└
Oct. 1, 2013- Sept. 30, 2014	<u> </u>
Oct. 1, 2014- Sept. 30, 2015	<u> </u>
Oct. 1, 2015- Sept. 30, 2016	
Oct. 1, 2016- Sept. 30, 2017	
Oct. 1, 2017- Sept. 30, 2018	H.
Oct. 1, 2018- Sept. 30, 2019	
Oct. 1, 2019 Sept. 30, 2020	
Oct. 1, 2020- Sept. 30, 2021	
Comments:	
Comments.	
7. Has the facility conducted routine and a	
Yes, monthly inspections	emi-annual Comprehensive Site inspections?
☐ Yes, semi-annual Comprehensi☐ No	ve Site inspections
Comments:	
Last time stormwater structures wer	e addressed:
B. Select all the completed monitoring pari	
3. Select all the completed monitoring peri-	ods and inspections below:
Semiannual-	n s
	y (20)
Inspections Monitoring	
☐ ☐ Oct. 1, 2011-March	
☐ ☐ April 1, 2012-Sept. 3	
☐ Oct. 1, 2012-March	
☐ April 1, 2013-Sept. 3	30, 2013
Oct. 1, 2013-March	
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Oct. 1, 2016-March 3	1, 2017
☐ April 1, 2017-Sept. 3	0, 2017
Oct. 1, 2017-March 3	1, 2018
☐ April 1, 2018-Sept. 30	

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Year 2	¥ _			8.0		
9						
Monitoring for a disch	arge to Impaired Waters	5 - <u>Y</u> N	NA	2		
Comments:					()* #2	•9
			27 N 285			1525
9. Are there addition	al sector specific require	ements?	6	52 °		
Yes				~		8
□ No		2.				
Comments						9 12
Common	"	***				(8)
10 Am all dumneters	covered and watertight	or are protected	d from exp	osure?	Z N	
10. Are an dumpstors	ere 2 or more dumpsters	(DR and MS	W)? []Y	$I \square N$		
a. Are th	e dumpsters labelled?	Π̈́Υ Π̈́Ν				
				i= 8		3
Comments	1997				₽	2
	d in storage drums, barr	ale tanks and	similar co	ntainers are:	(check all t	hat apply)
11. Materials containe	d in storage druins, ban	cis, tanks, and	Dillitur •o			
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	d leak-proof					
Comments		26			部	
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12. Select all the comp	leted annual Stormwate	r training perio	ods?)8 5 0	
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Oct. 1, 2020- Sept. 30, 2	021	(SP)			3		
Comments:	3	× × × ×	0 9	8 D	*	, Si	
13. Exit Interview Conducte Yes, Name No personnel on Comments:	30	**************************************	* 8	*	8 8	*	S (A
Summary of Inspection	on:	В			8 S		(6)
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STORMWATER POLLUTION PREVENTION PLAN CHECKLIST

Site Name: Site Address: Date of Plan:

1.

A complete Stormwater Pollution Prevention Plan ("plan") must be fully developed, implemented and kept current in accordance with the General Permit for the Discharge of Stormwater Associated with Industrial Activity issued on August 23, 2010 and effective October 1, 2011 ("general permit"). A complete plan shall include, but not be limited to, the following key elements which are described more fully in the general permit. This checklist shall be used in conjunction with the general permit when the Respondent is evaluating the adequacy and completeness of the plan.

Y=Yes, completely adequate. N=No, either not present or not adequate N.A= Not applicable

*	
FACILITY STORMV	TY DESCRIPTION- VATER POLLUTION PREVENTION TEAM [Section 5(c)(2)(C) of the general permit]
Y N.	Team Members are identified in the plan. At least one team member is present at the facility or on call during all operational shifts Team Member's responsibilities for plan development, implementation, maintenance an revision are clearly identified in the plan.
A. Si	ite map [Section 5(c)(2)(D)(i) of the general permit] contains the following:
Y N	N.A North arrow and surveyed or approximate property lines, including the total site
	acreage. Locations of existing buildings and structures. Overall site size and amount of impervious coverage as well as an outline of the drainage area, including the extent of the impervious surface. Location for each stormwater outfall and direction of flow within the drainage area.

. 12

- av	Locations of existing structural control measures ins	stalled to reduce no	Ilutants in
	Stormwater fulloff.		
	Locations of all stormwater conveyances including of	eatch basins, ditche	s, pipes, and
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	Areal extent of any wetlands to which stormwater di	scharges	
	L L Location of the receiving water body or bodies to will	nich the gite digebe	rges including
	the identification of any impaired waters and whether of	or not a total maxin	num daily load
	(11001) has been established for them		
	Locations of all stormwater monitoring points (inclu	ding latitude and lo	ngitude).
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	Location of materials exposed to precipitation.		
	Actual location of significant major spills and leaks l	isted in the narrativ	e Plan.
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	☐ ☐ Vehicle & equipment maintenance or cleaning areas. ☐ ☐ ☐ Loading/unloading areas.		848
	Waste treatment, disposal or storage areas.	2	
	Locations of liquid storage tanks.	=12	*. **:
(6)	De-icing material storage areas.	W	
	Processing areas.	1 di	
	Materials storage areas.		
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	Locations of all stormwater conveyances including ca swales as well as the location of any non-stormwater dis Location of the receiving water body or bodies to whi	tch basins, ditches, charges.	
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☐ ☐ ☐ Locations of discharges to groundwater through an infiltration system
B. Plan contains an inventory of exposed materials [Section 5(c)(2)(D)(ii) of the general permit]
X7 NI NI A
Y N N.A
Potential for discharge to cause erosion.
Potential for discharge to ended excession
C. Plan contains a narrative summary of potential pollutant sources [Section 5(c)(2)(D)(iii) of the general permit].
Y N N.A
☐ ☐ ☐ Materials management practices to minimize stormwater contact ☐ ☐ ☐ Method and location of on-site storage or disposal ☐ ☐ ☐ Location and description of structural and non-structural control measures to reduce pollutants in stormwater runoff ☐ ☐ ☐ Description of existing stormwater treatment
D. Leaks and spills [Section 5(c)(2)(D)(iv) of the general permit].
Y N N.A List & location of spills or leaks greater 5 gallons that could affect stormwater quality at the site (that occurred at the facility after the date of three years prior to the date of the certification of the Plan).
E. Stormwater monitoring program [Section 5(c)(2)(J) of the general permit].
NY NY NY A
N.A Description of monitoring program and stormwater sampling data for on-site
ctormyyater discharges.
Additional Monitoring of Discharges to Impaired Waters
Additional Monitoring of Discharges are properly
Impaired water Parameters (in approache) TMDL Parameter(s) (if dictated by DEEP)

MEASURES AND CONTROLS [Section 5(b) of the general permit]. The plan shall describe stormwater management controls appropriate for the facility including, but

3.

not limited to, the following:

Y N N.A

	Good housekeeping; i.e. provisions for maintaining a clean, orderly facility in all areas exposed to rainfall and can be a potential pollutant source [Section 5(b)(1) of the
	general permit.
	Prohibition against equipment or vehicles washing that would allow washwaters to
	onto a storm dramage system or a waterbody (Section 5(b)(2) of the government
	Provision that all floor drains connected to storm sewers are either sealed or approved and permitted by a local authority [Section 5(b)(2) and permitted by a local authority [Section 5(b)(2)].
	and permitted by a local authority [Section 5(b)(3) of the general permit].
I	Roof areas [Section 5(b)(4) of the general permit].
	Y N N.A
	Location of roof areas which may be a source of stormwater pollution (e.g., vent o
	CAHadas).
	Program for inspecting such roof areas.
A.	Codiment and a second s
	Sediment and erosion control [Section 5(b)(6) of the general permit]. Y N N.A
	I IV.A Identify potential erosion areas
İ	Implement erosion control measures
	— — — promone crosson control measures
В.	Preventive maintenance [Section 5(b)(8) of the general permit].
7	1 N N.A
ļ	Program for inspecting and maintaining stormwater management devices
L	I I I I I I I I I I I I I I I I I I I
	outid, in the event of failure or breakdown, result in a discharge of pollutants to symbols
Г	rators.
, L	Program for the appropriate maintenance for these equipment and systems.
C.	Spill prevention and response procedures [Section 5(b)(9) of the general permit].
Y	N N.A
	Identify areas for potential spills
	Potential spill locations and the accompanying drainage points
L	☐ ☐ Spill response procedures
	Secondary containment provided for mobile/portable above-ground tanks/containers
	and storage areas
	Provisions for impervious containment for all chemical storage and roof coverage for
_	otton container with a capacity of less than 100 gallons
	Provision for covering dumpsters, trash compactors, and roll-off containers to
_	prevent releases to stormwater drainage systems
L_	Loading docks covered and protected from rainfall
D.	Employee training program and sale 1-1-19
Y	Employee training program and schedule [Section (5)(b)(10) of the general permit].
Γ	
	Employee training program, schedule and training topics.
-	Training received within ninety days of employment and at least once a year thereafter.

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1	Ξ.	Non-stori	nwater dis	scharges [S	lection 5(b)	(11) of the	e general pe	ermit].		
_		N N.A				75		•		
***			escription	Certification of all testion, and dra	n ing and eva iinage loca	aluation m tions teste	ethods use	d, the date	s and result	s of any
I	3.	Managen	ent of run	off [Section	n 5(b)(7) c	f the gene	ral permit].	* (*)		
	.Y.	N N.A	Discussion	of the ne	ed for sto	rmwater n	nanagemen	t or treatn	nent beyond	1 source
		$\Box\Box$ D	escription	of manag	gement or (2) of the g	treatment eneral per	t measures mit].	to be imp	lemented	
			8						(A)	(# 54
		Pr	ocedures to ovision fo	for correcti r maintain	ve action to ing inspect	o be under ion record	ated equipr taken follo s at the faci	lity	ction	
	a F	Routine (m	inimum o	f monthly	with inforn	nation on a	reas routin	ely inspect	ed)	
		N N.A					8		" w y	
						125		1/2	9	•
	b. Y □[AT AT A			n[Section 5		he general	permit].		8
		ope conti	erational er ol measur spection of paration o	valuation of es, and oth fequipment f an inspec	of stormwater pollution	er manage n prevention implement discussing	on measure on measure of plan, e.g. g scope, ins	sures, erosi s. ., spill resp		el,
I	OISCH OPUI	LATION (OF 100,00	0 OR MOI	RE [Section te shall con	1 5(c)(Z)(C nplv with	WER SYS 3) of the ge applicable in A. if not applicable in the properties of the	municipal s	RVING A it]. stormwater	
C		N.A	e plan ma rmeasure	noforono	o requirem	ents cont	(H) of the gained in a ntrol plan r	Spill Prev	mit]. ention Conder der federal,	rol and state or
		100ai Ia				*			z ²⁰ a	

List Name and Date of Plan (or N.A. if not applicable)

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7.	COVERAGE OF SALT STORAGE PILES [Section 5(b)(12) of the general permit].
363	Provision for covering salt storage piles, including pure salt or salt mixed with other materials, which may come into contact with stormwater (List Yes, No, on N.A. if not applicable).
8.	FUTURE CONSTRUCTION [Section 5(c)(2)(I) of the general permit]. Provision for proper management and treatment of stormwater for all construction which may impact the on-site stormwater drainage system (List Yes No, or N.A. if not applicable).
9. 1 0.	PROFESSIONAL ENGINEER CERTIFICATION [Section 5(c)(7) of the general permit]. Y N N.A ☐ ☐ Plan contains required compliance certification and is signed by a CT licensed professional engineer OBSERVATIONS, RECOMMENTATIONS AND CORRECTIVE ACTIONS TAKEN.
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