

INTEGRATED CONTINGENCY PLAN (ICP)

VOLUME I FIELD IMPLEMENTATION

STATE OF CONNECTICUT DEPARTMENT OF TRANSPORTATION

**MILFORD MAINTENANCE & REPAIR & BRIDGE
GARAGES**

**44 BANNER DRIVE MILFORD, CT 06460
0083-1**

**TRAINING
GOOD HOUSEKEEPING
SPILL RESPONSE
INSPECTIONS & VISUAL MONITORING**

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

AND

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

JANUARY 2026

**INTEGRATED CONTINGENCY PLAN (ICP)
FIELD IMPLEMENTATION**

**MILFORD MAINTENANCE & REPAIR & BRIDGE
GARAGES**

MILFORD, CONNECTICUT

CTDOT Project Number: 422-8420

Prepared for
State of Connecticut Department of Transportation
Newington, Connecticut

Prepared by
HRP Associates, Inc.

January 2026

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INTRODUCTION

This Integrated Contingency Plan (ICP) Field Implementation guide has been developed for the Connecticut Department of Transportation (CTDOT) to serve as a guide for routine compliance activities carried out by CTDOT maintenance garage employees.

In Connecticut, the storm drainage from maintenance garages is regulated by the State as an industrial stormwater discharge. This garage is permitted to discharge its stormwater because it is registered under Connecticut Department of Energy and Environmental Protection (CT DEEP) *General Permit for the Discharge of Stormwater Associated with Industrial Activity* (Industrial Stormwater Permit). A major condition of the Industrial Stormwater Permit is to have and to follow a current **Stormwater Pollution Prevention Plan (SWPPP)**.

The U.S. Environmental Protection Agency (EPA) regulates any site that has more than 1,320 gallons of petroleum in above ground storage under Title 40 of the Code of Federal Regulations (CFR) Part 112. This garage has more 1,320 gallons of petroleum in above ground storage. A major condition of the EPA's rule is to have and to follow a **Spill Prevention, Control, and Countermeasure (SPCC) Plan**.

Because of the many similarities between the SWPPP and SPCC Plan, sites are allowed to combine their plans into an **ICP**.

Additional regulatory and permit requirements related to the CT DEEP Industrial Stormwater Permit and EPA's 40 CFR Part 112 rules can be found in **Volume II** of this plan.

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1.0 EMPLOYEE TRAINING

All employees whose activities may affect stormwater quality must attend annual training.

The Connecticut Department of Transportation's (CTDOT) Office of Environmental Compliance (OEC) and Highway Operations Training Unit provides annual training to all General Supervisors and Crew Leaders on the general requirements of the Integrated Contingency Plan (ICP).

The General Supervisor is responsible for providing annual training to all their site personnel whose activities may affect stormwater quality. The General Supervisor's training must cover the general requirements as well as the features that are specific to the location.

New hires must complete the training course within 90 days of employment.

The General Supervisor is responsible for providing training to all new hires whose activities may affect stormwater quality. The General Supervisor's training must cover the general requirements as well as the features that are specific to the location. New hire training shall address topics such as spill response, good housekeeping, and material management practices.

The typical agenda to be covered at employee training sessions is provided below:

- Contents of the ICP as found in Volume II;
- Pollution Prevention Team - Identify who is on the Team. Explain that CTDOT is continually looking to avoid pollution to the storm system and appreciates input and assistance from all;
- General facility operations including:
 - fueling procedures,
 - spill response and emergency procedures,
 - good housekeeping,
 - location of emergency equipment,
 - control measures procedures, locations and maintenance,
 - used oil management,
 - used battery management,
 - inspections, and
 - material management practices;
- Operation and maintenance of equipment that would best prevent discharges;
- Potential stormwater pollutant sources (listed in **Section 2.4**);
- Inspection frequency and procedures for record keeping and corrective actions;
- Record of spills, discharges or failures, malfunctioning components, and the ways to prevent future incidents by reviewing existing counter measures to prevent the incidents from happening again;

- Site-specific emergency procedures; and
- Applicable pollution control laws rules and regulations;
 - The Connecticut Department of Energy and Environmental Protection (CT DEEP) regulates the *General Permit for the Discharge of Stormwater Associated with Industrial Activities* which requires a Stormwater Pollution Prevention Plan (SWPPP).
 - U.S. Environmental Protection Agency (EPA) regulates Title 40 of the Code of Federal Regulations (CFR) Part 112 which requires a Spill Prevention, Control, and Countermeasure (SPCC) Plan.

Attendees of all trainings must sign the Employee Training Sign-Off sheet included in this section. Please make as many copies as needed.

The annual and new hire trainings will fulfill the requirements of the General Permit under Section 4.2.13 and the requirements of the SPCC regulations 40 CFR 112.7(f)].

Copies of the training records MUST be kept with this plan for five years after the expiration of the General Permit which will fulfill the record retention requirements of the General Permit under Section 4.8.3 and 40 CFR 112.7(e).

Management of Potential Pollutant Sources: **SALT STORAGE AND HANDLING**



Garage employees should not overfill salt sheds and expose the product to stormwater.



Salt dissolved in stormwater will run off onto the site and into catch basins.



Garage employees should store salt and sand/salt mix piles inside the salt shed. Do not leave piles of salt outside of the salt shed. Clean up any salt spills in the yard.



Store salt and sand/salt mix piles inside the shed. Ring the salt pile with hay bales at the end of the season.

Management of Potential Pollutant Sources: **GALVANIZED MATERIALS**



Elevate and cover galvanized steel with tarps to the extent possible.



Elevate and cover galvanized steel with tarps to the extent possible.



Elevate and cover galvanized steel with tarps to the extent possible.



Cover piles of stored material to the extent possible.

Management of Potential Pollutant Sources: **GOOD HOUSEKEEPING**



Loose material should not be stored around catch basins.



Cover piles of stored material to the extent possible.



Ring sand pile with hay bales.



Keep area around magnesium chloride tank free from parked vehicles and stored material to the extent possible.



Keep area around magnesium chloride tank free from parked vehicles and stored material to the extent possible. (Additional magnesium chloride tank added, see photo at end of table)



A complete spill kit should be stored inside the garage with a spark free shovel, Speedi-dri, absorbent pads, broom, and a disposal container.



Use dry cleanup methods for spills and leaks.



Use dry cleanup methods for spills and leaks.



Keep drip pans available to be placed under leaking vehicles.



Drums/containers placed directly on permanent spill containment systems. No extra pallet needed.



Label and contain hazardous chemicals. Keep spill containment and chemicals free from stormwater and stormwater run on.



All dumpsters should be free of damage and have covers and drain plugs intact.



All dumpsters should have covers and drain plugs intact.



All dumpsters should have covers and drain plugs intact.



All dumpsters should have covers and drain plugs intact.



Rinse and wash vehicles inside garage bays or designated wash bays.



Perform equipment maintenance activities indoors and minimize stormwater in maintenance areas (e.g., close bay doors during storms).



Store vehicles and equipment indoors to the extent possible.



Do not discharge paint or other waste to any on-site drains or catch basins.



Oily debris waste disposal bins.



Store new and used petroleum products on impervious surfaces with secondary containment.



Store new and used petroleum products on impervious surfaces with secondary containment. Drain all parts of fluid into proper containers prior to disposal.



Maintain pavement around catch basins.



Maintain pavement and sweep loose material around catch basins.



Sweep paved areas often to keep it free from sands, sediments, and debris.



Keep spill kits available near vehicle maintenance areas/vehicle storage areas.



Keep spill kits and catch basin covers available near fueling and petroleum storage areas.



Material storage.



Keep area around magnesium chloride tank free from parked vehicles and stored material to the extent possible. (Additional magnesium chloride tank added)

2.0 FACILITY INFORMATION

Facility Name: Milford Maintenance & Repair & Bridge Garages
Facility Address: 44 Banner Drive Milford, CT 06460
Owner: State of Connecticut Department of Transportation
Owner Address: 2800 Berlin Turnpike, Newington, CT 06111

2.1 POLLUTION PREVENTION TEAM AND EMERGENCY CONTACT LIST

Pollution prevention team contact information should be kept current on the following page. A single strikethrough will indicate that a person is no longer in that role.

Program Coordinator:

OEC, Transportation Principal Engineer

Telephone: 860-594-3404

Responsibilities:

Coordinate development and implementation of the SWPPP, coordinate discharge monitoring for samples that will be submitted to an analytical lab, submit discharge monitoring reporting to regulatory agencies.

Team Leader(s)

raining Supervisor – Operations Training Unit

Responsibilities:

Conduct annual training for all General Supervisors and Crew Leaders on the general requirements of the ICP as outlined in ICP **Volume I Section 1.0**.

District Maintenance Manager

Responsibilities:

Review and verify accuracy of semi-annual Comprehensive Site Compliance Evaluation inspection checklist and follow up with corrections for any problems identified by the inspector.

Bridge Maintenance Manager

Responsibilities:

Review and verify accuracy of semi-annual Comprehensive Site Compliance Evaluation inspection checklist and follow up with corrections for any problems identified by the inspector.

Equipment Repair Manager

Responsibilities:

Review and verify accuracy of semi-annual Comprehensive Site Compliance Evaluation inspection checklist and follow up with corrections for any problems identified by the inspector.

Transportation Materials Storage Supervisor

Responsibilities:

Review and verify accuracy of semi-annual Comprehensive Site Compliance Evaluation inspection checklist and follow up with corrections for any problems identified by the inspector.

Highway Operations Garage Supervisor

Responsibilities:

Conduct or oversee quarterly visual stormwater monitoring and all inspections, conduct or oversee annual training program, act as spill response coordinator, oversee good housekeeping practices and preventative maintenance activities on-site. Maintain records and logs. Notify the Program Coordinator of any revisions.

Repair Garage Supervisor/Bridge Maintenance Garage Supervisor/Electrical Garage Supervisor/Materials Storage Supervisor

Responsibilities:

Conduct or oversee stormwater monitoring, sampling, analysis, and inspections, conduct or oversee annual training program, act as spill response coordinator, oversee good housekeeping practices and preventative maintenance activities on-site. Maintain records and logs. Note revisions to the SWPPP in **Volume II Appendix D**. Notify the Program Coordinator of any revisions.

Team Members:

Highway Operations Crew Leader

Responsibilities:

Assist with the SWPPP program responsibilities as designated by the Team Leader. Keep all records and documentation, and ensure reports are submitted.

OEC Transportation Engineers and Planners

Responsibilities:

Coordinate spill contractor and environmental consultant oversight in the event of a petroleum or chemical release at the maintenance garage or by maintenance equipment on state or local roads. Receive stormwater inspections and spill reports required for annual reporting.

CTDOT Emergency Spill Response Phone Telephone:

Primary: 860-690-7509 (1st call)
Secondary:..... 860-594-3404 (if no answer)

Emergency Agencies:

National Response Center (NRC)(800) 424-8802
Fire Department.....911
Police Department911

EPA	(617) 223-7265
CT DEEP - Oil and Chemical Spill.....	(860) 424-3338
CT State Police (Troop “G”)	(203) 696-2500
State Emergency Response Commission (SERC).....	(860) 424-3373
Bridgeport Hospital (Milford Campus)	(203) 876-4100

POLLUTION PREVENTION TEAM CONTACT INFORMATION		
Team Member Name	Team Member Role	Phone Number
Jason Coite	Program Coordinator	860-594-3404
Peter Dicesare	District Maintenance Section Manager	
	Bridge Maintenance Manager	
Nicholas Abraham	Bridge Maintenance General Supervisor	
	Bridge Maintenance/Signs & Markings Crew Leader	
	Equipment Repair Manager	
	Equipment Repair General Supervisor	
	Equipment Repair Crew Leader	
	Transportation Materials Storage Manager	
	Transportation Materials Storage General Supervisor	
	Transportation Materials Storage Crew Leader	
	Highway Operations Manager	
FRANK TARTAMELLA	Highway Operations General Supervisor	
	Highway Operations Crew Leader	
	Electrical Manager	
	Electrical General Supervisor	
	Electrical Crew Leader	
Print Copies as Needed		

2.2 FACILITY MAPS AND DIAGRAMS

The following pages include:

1. A **Facility Diagram (Figure 1)** including indoor and outdoor storage areas, locations of spill response equipment, site layout and features, and catch basin locations.
2. A **Stormwater Monitoring Site Plan (Figure 2)** depicting locations of stormwater monitoring points (outfalls, manholes, etc.), including latitude and longitude, and flow direction on an aerial basemap.

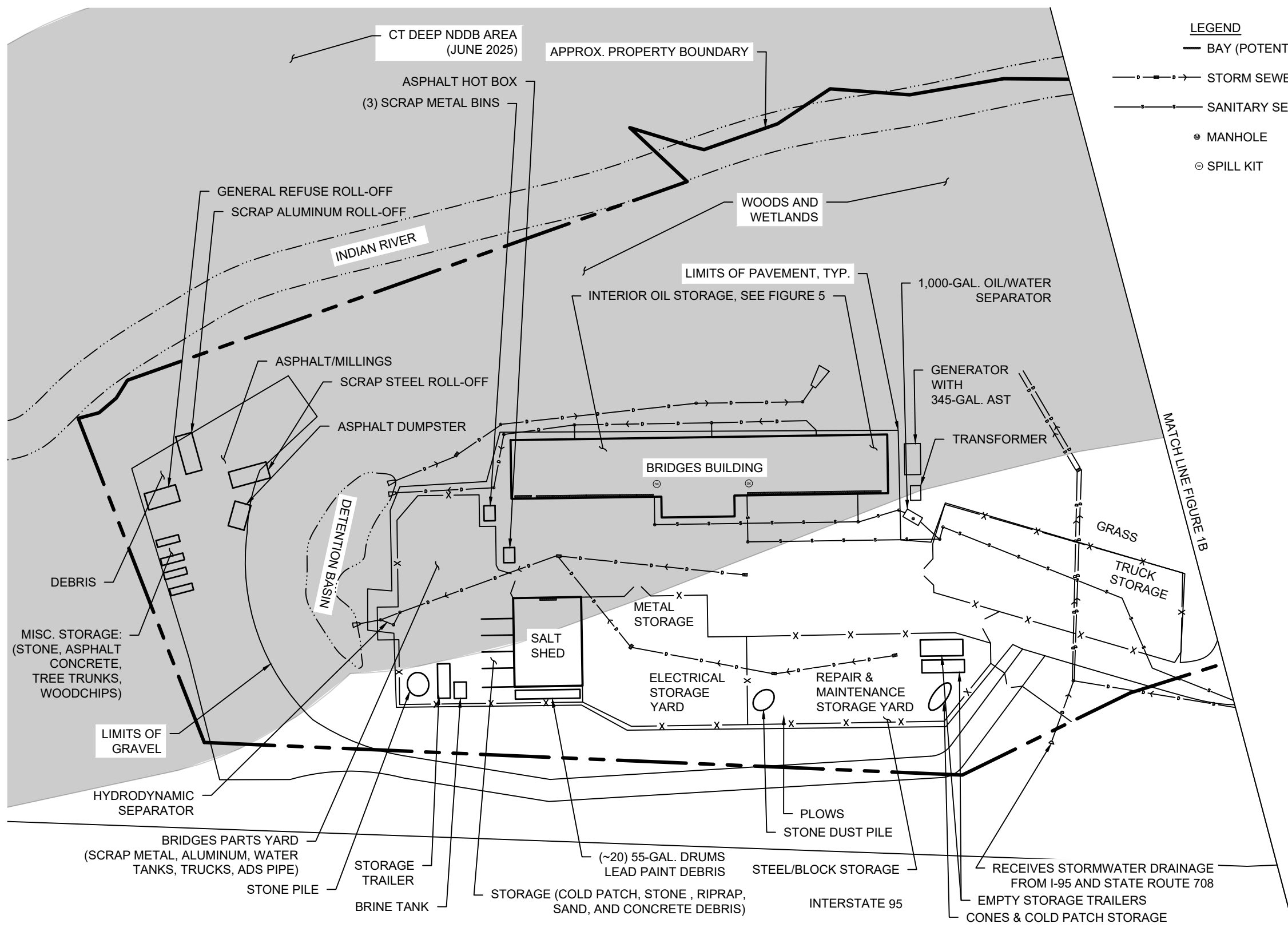
Additional figures can be found in **Volume II, Section 2.0**.

2.3 POTENTIAL POLLUTANT SOURCES

The following table includes descriptions of the facility's specific potential pollutant sources. This is a list of all the on-site materials and features that could cause storm drainage to pick up pollutants harmful to the receiving water. Refer to this table when reviewing stormwater monitoring data that show that any of the benchmark parameters have been exceeded (**Volume II, Section 7.0**).

This table also includes the material inventory. The locations of such areas are depicted on **Figure 1**.

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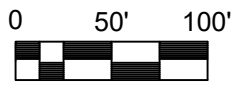


LEGEND

- BAY (POTENTIAL LOADING/UNLOADING)
- STORM SEWER WITH CATCH BASIN
- SANITARY SEWER
- ⊙ MANHOLE
- ⊙ SPILL KIT



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REVIEWED BY:	KAM

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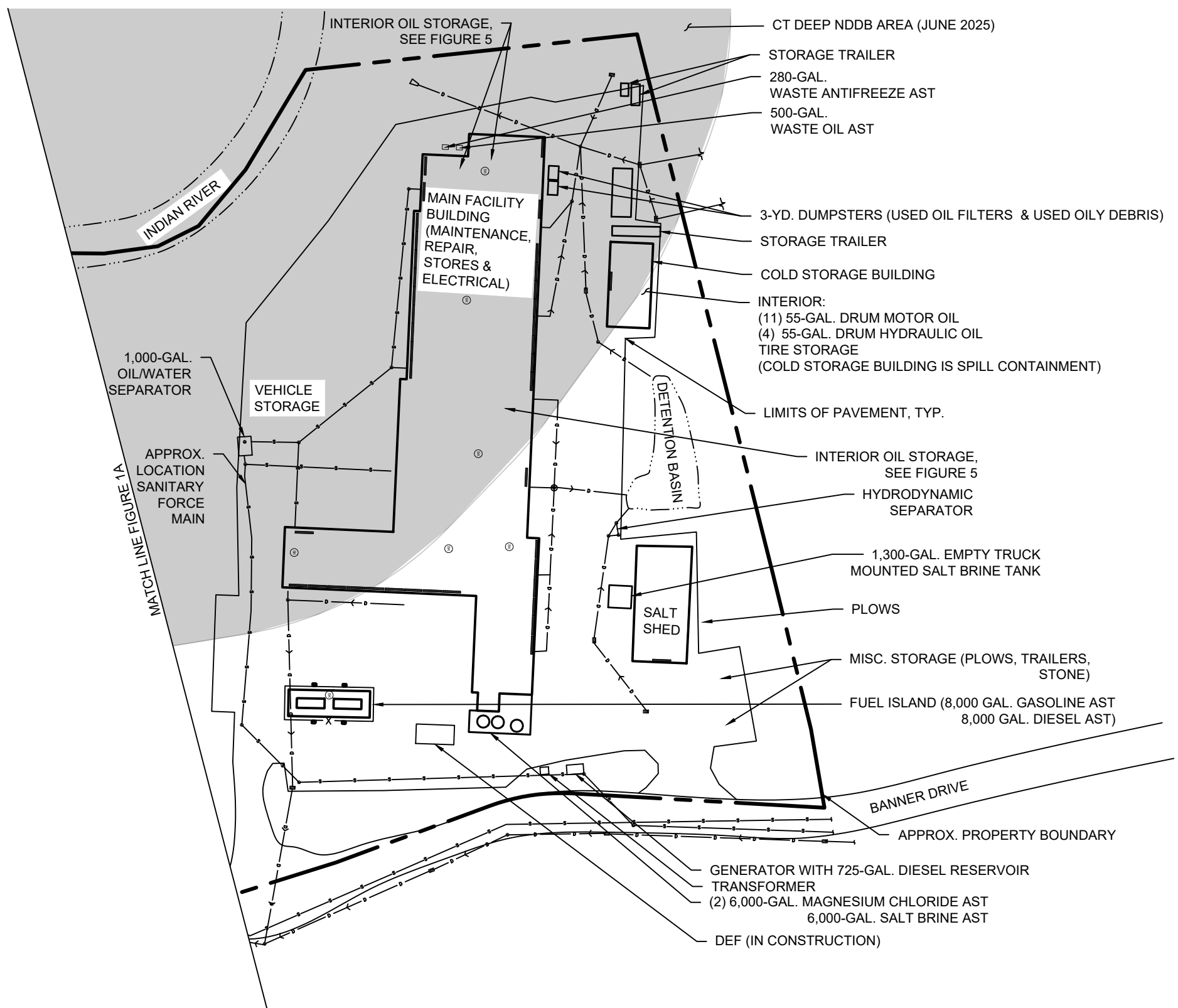
FACILITY DIAGRAM
MILFORD MAINTENANCE & REPAIR &
BRIDGE GARAGES
44 BANNER DRIVE,
MILFORD, CONNECTICUT

FIGURE NO.
1A

NOTES:
1. IDENTIFIED SITE FEATURES, INCLUDING STORM SEWER NETWORK, ARE APPROXIMATE BASED ON FIELD OBSERVATIONS AND THE PROVIDED MAP REFERENCES. A SITE SURVEY WAS NOT PERFORMED AND ACTUAL CONDITIONS MAY VARY.

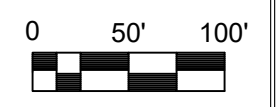
MAP REFERENCES:
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- LEGEND**
- BAY (POTENTIAL LOADING/UNLOADING)
 - STORM SEWER WITH CATCH BASIN
 - SANITARY SEWER
 - ⊙ MANHOLE
 - ⊙ SPILL KIT

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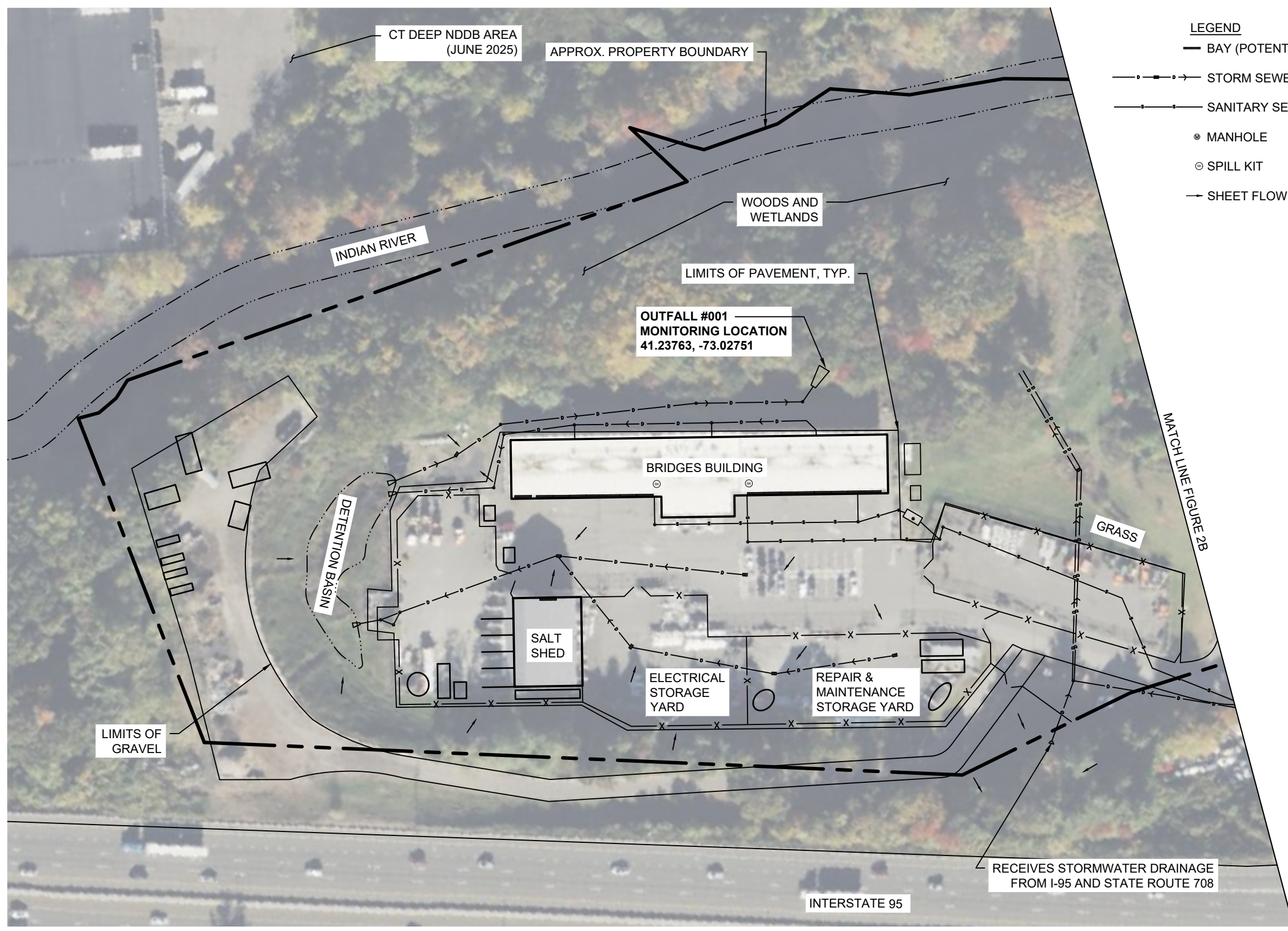
FACILITY DIAGRAM
 MILFORD MAINTENANCE & REPAIR &
 BRIDGE GARAGES
 44 BANNER DRIVE,
 MILFORD, CONNECTICUT

FIGURE NO.
1B

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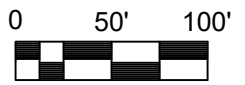


LEGEND

- BAY (POTENTIAL LOADING/UNLOADING)
- STORM SEWER WITH CATCH BASIN
- SANITARY SEWER
- ⊙ MANHOLE
- ⊙ SPILL KIT
- SHEET FLOW DIRECTION



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FACILITY DIAGRAM
MILFORD MAINTENANCE & REPAIR &
BRIDGE GARAGES
44 BANNER DRIVE,
MILFORD, CONNECTICUT

FIGURE NO.
2A

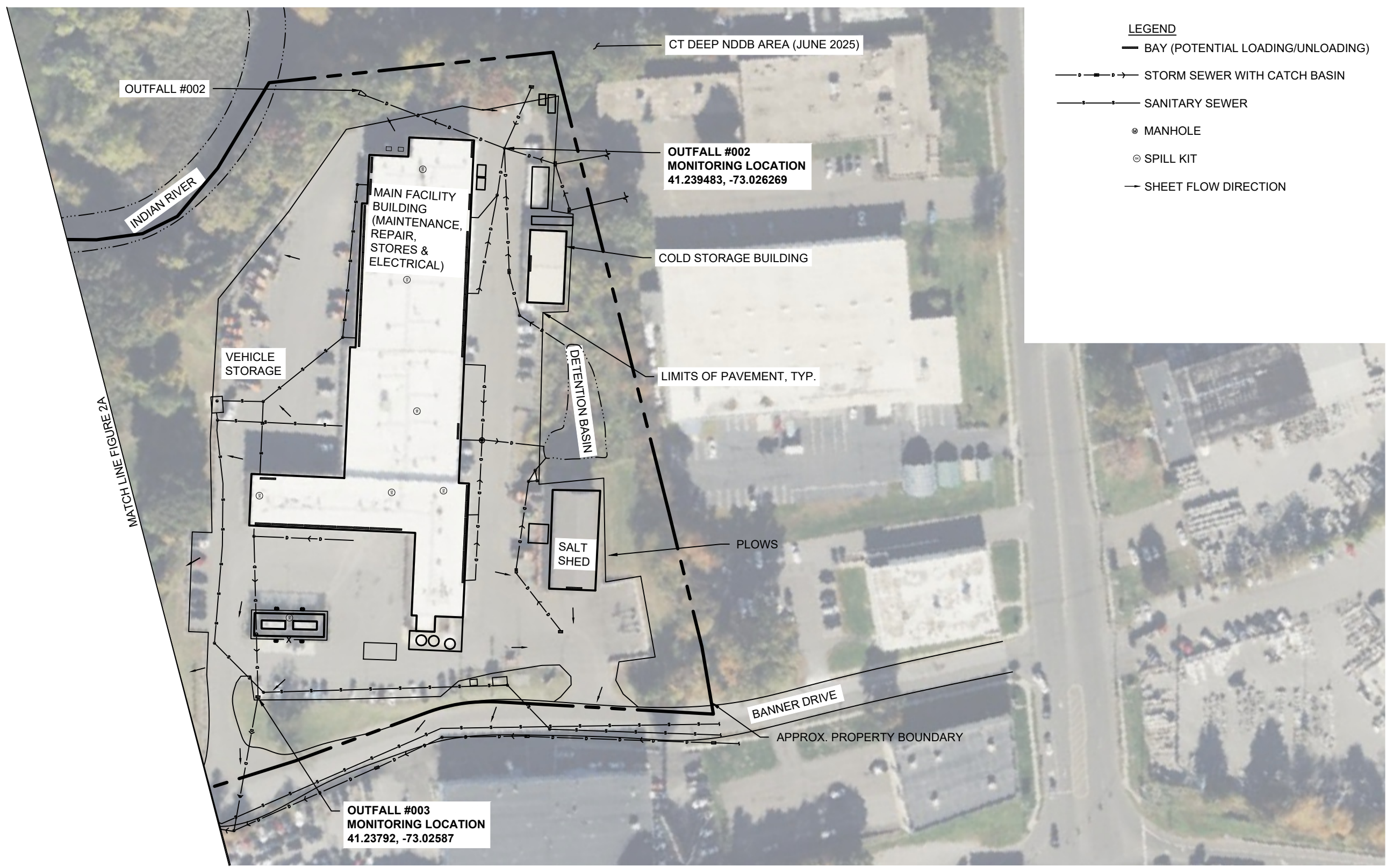
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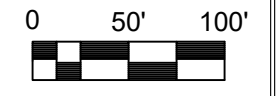
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- LEGEND**
- BAY (POTENTIAL LOADING/UNLOADING)
 - STORM SEWER WITH CATCH BASIN
 - SANITARY SEWER
 - ⊙ MANHOLE
 - ⊙ SPILL KIT
 - SHEET FLOW DIRECTION

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FACILITY DIAGRAM
 MILFORD MAINTENANCE & REPAIR &
 BRIDGE GARAGES
 44 BANNER DRIVE,
 MILFORD, CONNECTICUT

FIGURE NO.
2B

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**Potential Pollutant Inventory List
Milford Maintenance & Repair & Bridge Garages**

Inventory Item	Item Construction Details (As Applicable)	Quantity / Size	SWPPP / SPCC Applicability	Location	Drainage Area/Outfall ###	Secondary containment	Potential Pollutant	General Notes
Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage								
Diesel Dispenser	N/A	1 / N/A	SWPPP & SPCC	Fuel Island	003	N/A	Oil and Grease	
Gasoline Dispenser	N/A	1 / N/A	SWPPP & SPCC	Fuel Island	003	N/A	Oil and Grease	
DEF Dispenser	IN CONSTRUCTION	1 / N/A	SWPPP	East of Fuel Island	003	N/A	pH, nitrogen	
Gasoline AST	Convault Concrete Tank	1 / 8,000-gal	SWPPP & SPCC	Fuel Island	003	Double-walled 110%	Oil and Grease	Electrical tank monitoring systems are utilized on ASTs
Diesel AST	Convault Concrete Tank	1 / 8,000-gal	SWPPP & SPCC	Fuel Island	003	Double-walled 110%	Oil and Grease	Electrical tank monitoring systems are utilized on ASTs
DEF AST	IN CONSTRUCTION	1 / IN CONSTRUCTION	SWPPP	East of Fuel Island	003	Double-walled 110%	pH, nitrogen	
Vehicle and Equipment Storage (exterior)	Maintenance/Repair Garage	N/A	SWPPP	Maintenance/Repair Garage	004	N/A	Copper, lead, zinc, Oil & Grease	
Vehicle and Equipment Storage (exterior)	Bridge Maintenance Facility	N/A	SWPPP	Bridge Maintenance Facility	001	N/A	Copper, lead, zinc, Oil & Grease	
Oil/Water Separator	Maintenance/Repair Garage	1 / 1,000-gal	SWPPP	East of main facility building	004	N/A	Copper, lead, zinc, Oil & Grease	Captures material from facility floor drains
Oil/Water Separator	Bridge Maintenance Facility	1 / 1,000-gal	SWPPP	North of bridge building	001	N/A	Copper, lead, zinc, Oil & Grease	Captures material from facility floor drains
Motor Oil Drum	Steel	22 / 55-gal	SWPPP & SPCC	(3) In lube room in main facility building, (7) in stores stock room in main facility building, (11) in cold storage building, and (1) in weld shop in main facility building	002	Indoors, spill containment trench, cold storage building	Oil and Grease	
Bridge Oil Drum	Steel	4 / 55-gal	SWPPP & SPCC	Spill containment pallet inside garage bays of bridge building	001	Indoors, spill pallet	Oil and Grease	
Hydraulic Oil Drum	Steel	11 / 55-gal	SWPPP & SPCC	(3) In lube room in main facility building, (3) in stores stock room in main facility building, (4) in cold storage building, (1) in weld shop in main facility building	002	Indoors, spill containment trench, cold storage building	Oil and Grease	

Potential Pollutant Inventory List Milford Maintenance & Repair & Bridge Garages

Inventory Item	Item Construction Details (As Applicable)	Quantity / Size	SWPPP / SPCC Applicability	Location	Drainage Area/Outfall ###	Secondary containment	Potential Pollutant	General Notes
Transmission Fluid Drum	Steel	1 / 55-gal	SWPPP & SPCC	In lube room in main facility building	002	Indoors, spill containment trench	Oil and Grease	
Biohydraulic Oil Drum	Steel	1 / 55-gal	SWPPP	In lube room in main facility building	002	Indoors, spill containment trench	Oil and Grease	
Fluid Film Drum	Steel	1 / 55-gal	SWPPP	In lube room in main facility building	002	Indoors, spill containment trench	Oil and Grease	
Wash Bay	N/A	1 / N/A	SWPPP	Maintenance/Repair Garage	002	N/A	Phosphorous, Nitrogen	
Wash Bay	N/A	1 / N/A	SWPPP	Bridge Maintenance Facility	001	N/A	Phosphorous, Nitrogen	
Motor Oil AST	Steel	1 / 330-gal	SWPPP & SPCC	Inside lube room in main facility building	002	Double-walled 110%	Oil & Grease	
Waste Oil AST	Steel	1 / 500-gal	SWPPP & SPCC	Outside of repair bay	004	Double-walled 110%	Oil & Grease	Contains used oil from vehicle repair operations
Hydraulic Oil AST	Steel	1 / 330-gal	SWPPP & SPCC	Inside lube room in main facility building	002	Double-walled 110%	Oil & Grease	
Waste Coolant AST	Steel	1 / 280-gal	SWPPP	Outside of repair bay	004	Double-walled 110%	COD, Copper, Nickel, Zinc	Contains used antifreeze from vehicle repair operations
Salt and Deicing Chemicals								
Salt Shed	N/A	1 / N/A	SWPPP	Northeast of main maintenance facility	002	N/A	Chlorides, cyanide	
Salt Shed	N/A	1 / N/A	SWPPP	South of bridge maintenance facility	001	N/A	Chlorides, cyanide	
Magnesium Chloride AST	HDLPE	2 / 6,000-gallon	SWPPP	East of DA-3A, next to brine tank	003	Double-walled 110%	Chlorides	
Brine Mixing AST	HDPE	1 / 6,000-gallon	SWPPP	East of DA-3A, next to magnesium chloride tank	003	Double-walled 110%	Chlorides, cyanide	
Sand Pile	N/A	1 / N/A	SWPPP	Southwest of salt shed near bridge building	001	N/A	Total Suspended Solids	
Material Storage & Handling								
Diesel AST for Generator	Steel	1 / 725-gallon (maintenance/repair)	SWPPP & SPCC	Generator east of main facility building	003	Double-walled 110%	Oil and Grease	
Diesel Generator Day-Tank	Steel	1 / 345-gallon (bridge)	SWPPP & SPCC	Generator north of bridge building	003	N/A	Oil and Grease	

Potential Pollutant Inventory List Milford Maintenance & Repair & Bridge Garages

Inventory Item	Item Construction Details (As Applicable)	Quantity / Size	SWPPP / SPCC Applicability	Location	Drainage Area/Outfall ###	Secondary containment	Potential Pollutant	General Notes
Brine Tank	Truck-mounted HDPE	1 / N/A	SWPPP	Northeast of main facility building	002	N/A	Chlorides, cyanide	
Brine Tank	Truck-mounted HDPE	1 / N/A	SWPPP	Southwest of salt shed near bridge building	001	N/A	Chlorides, cyanide	
Metal Storage/Steel	N/A	2 / N/A	SWPPP	In electrical storage yard; in repair & maintenance storage yard	001	N/A	Zinc	
Cold Patch Asphalt	N/A	2 / N/A	SWPPP	(1) southwest of salt shed near bridge building and (1) in repair & maintenance storage yard	001	N/A	Oil & Grease	
General Refuse Debris	N/A	1 / N/A	SWPPP	Southwestern edge of site	001	N/A	Oil and Grease, Copper, Nickel, Zinc, Total Suspended Solids, Phos., Nitrogen, COD	
Stone/Crushed Stone/Stone Dust	N/A	1 / N/A	SWPPP	North edge of site	002	N/A	Total Suspended Solids	
Stone/Crushed Stone/Stone Dust	N/A	4 / N/A	SWPPP	(1) Southwestern edge of site, (2) southwest of salt shed near bridge building, (1) in repair & maintenance storage yard	001	N/A	Total Suspended Solids	
Concrete/Block	N/A	3 / N/A	SWPPP	(1) Southwestern edge of site, (1) southwest of salt shed near bridge building, (1) in repair & maintenance storage yard	001	N/A	Total Suspended Solids	
Asphalt/Millings	N/A	2 / N/A	SWPPP	In southwestern portion of site	001	N/A	Total Suspended Solids	
Tree trunks/Woodchips	N/A	1 / N/A	SWPPP	In southwestern portion of site	001	N/A	Total Suspended Solids	
ADS Pipe	N/A	1 / N/A	SWPPP	In bridges parts yard	001	N/A	Total Suspended Solids	
Traffic Items/Cones	N/A	1 / N/A	SWPPP	In repair & maintenance storage yard	001	N/A	Total Suspended Solids	
Plows/Trailers	N/A	2 / N/A	SWPPP	In repair & maintenance storage yard, northeast of main facility	002	N/A	Zinc	
Lead Paint Debris Drum	Steel	20 / 55-gal drum	SWPPP	East of salt shed near bridge building	001	N/A	Lead	

**Potential Pollutant Inventory List
Milford Maintenance & Repair & Bridge Garages**

Inventory Item	Item Construction Details (As Applicable)	Quantity / Size	SWPPP / SPCC Applicability	Location	Drainage Area/Outfall ###	Secondary containment	Potential Pollutant	General Notes
Resin	Steel	3 / 55-gal drum	SWPPP	Inside wash bay of bridge building	001	N/A	Oil and Grease	
On-Site Waste Management								
General Refuse Dumpster/Roll-off	N/A	1 / N/A	SWPPP	In southern portion of site	001	N/A	Oil and Grease, Copper, Nickel, Zinc, Total Suspended Solids, Phos., Nitrogen, COD	Contains general municipal solid waste or general refuse
Scrap Metal Dumpster/Roll-off	N/A	2 / N/A	SWPPP	In southern portion of site	001	N/A	Copper, lead, zinc, Oil & Grease	Contains scrap metal for recycling
Asphalt Dumpster	N/A	1 / N/A	SWPPP	In southern portion of site	001	N/A	Oil and Grease, Copper, Nickel, Zinc, Total Suspended Solids, Phos., Nitrogen, COD	
Oily Debris Dumpster	N/A	2 / N/A	SWPPP	North of main facility building near cold storage building	002	N/A	Oil and Grease, Copper, Nickel, Zinc, Total Suspended Solids	Contains empty motor oil, used automotive oil filters, spent Speedi-dri and oily waste containers
Roof Areas								
Roof Drainage Exhaust and Vents	N/A	3 / N/A	SWPPP	Welding shop of main facility building	002	N/A	Zinc, Oil & Grease	General shop ventilation, welding exhaust, and natural gas fired boiler chimney stack
Roof Drainage Exhaust and Vents	N/A	2 / N/A	SWPPP	Welding shop of bridge building	001	N/A	Zinc, Oil & Grease	General shop ventilation, welding exhaust, and natural gas fired boiler chimney stack

3.0 GOOD HOUSEKEEPING

Stormwater controls at the facility will be inspected regularly and maintained annually or on an as-needed basis. Deficiencies should be noted during the inspections and corrected. Good housekeeping and materials management practices will contribute to a reduction in stormwater pollution potential from activities at the Site.

Good Housekeeping Practices employed by the Garage Personnel at this facility include:

- Keeping outdoor areas free of loose debris.
- Ensuring all containers of chemicals and wastes maintain accurate and legible labels and are stored in a neat and orderly manner.
- Cleaning and removing spills that are 1-gallon or less promptly using dry absorbents.
- Contacting the CTDOT OEC for spills greater than 1 gallon.
- Relocating any vehicles or equipment leaking its oils or fluids to either an indoor location or to the intended CTDOT Highway Operations' Repair Facility (a drip pan with an absorbent pad must be available to be placed under the source of the leak while the vehicle/equipment remains outdoors until it can be relocated).
- Minimizing the quantity of materials stored with exposure to stormwater including materials stored indoors and adjacent to garage bay doors.
- Storing loose material, like sand, gravel, and salt, in neat piles ringed with hay bales, covered, or otherwise contained.
- Maintaining the facility's curbing and catch basins in good condition and repairing as needed.
- Ensuring that the waste/recycling vendors are providing dumpsters with hard covers.
- Closing all dumpsters' hardcovers at the end of each day and before rain or snow events.
- Checking to confirm the spill kits are complete with a spark-free shovel, dry absorbents, brooms, and a disposal container, and replenishing the kits as needed.
- Keeping the garage bays' and wash bay's trench drains clear of sediment and debris.
- At the direction of the garage supervisor, using the streetsweeper to prevent sand and sediment from washing into catch basins and to limit the frequency that catch basin, gross particle separators, and detention basins need to be vacuumed out.
- Based on observations made during inspections, coordinate the wet-cleaning (scrub or steam clean) of any exterior pavement staining from vehicle leaks and ensure wash water is properly collected and disposed (sanitary sewer, wastewater holding tank, or otherwise containerized and recovered by a waste vendor).

4.0 SPILL RESPONSE PROCEDURES

Garage personnel must notify CTDOT OEC within 0.5 hours of discovery so that CT DEEP can be notified by OEC within the one-hour reporting window.

The flow chart included in this section for facility/equipment spills has been developed to streamline the requirements. Also included in this section is the CTDOT's Incidental Spill Report Form.

The information included in the flow chart and required in the Incidental Spill Report Form have been consolidated as a mobile application. Follow the link or QR code provided below to determine how the spill should be reported to OEC (i.e., phone call and Spill Report Form, or Spill Report Form only).

Mobile Spill Reporting



4.1 RELEASE RESPONSE PROCEDURES

Spills greater than one gallon will need to be reported by garage personnel to Environmental Compliance within 0.5 hours of discovery so that CT DEEP can be notified by OEC within the one-hour reporting window.

For incidental spills at facilities that are one gallon or less, garage personnel must either clean up the spill within two hours or the spill must be reported to OEC to report to CT DEEP within the one-hour window required by state regulation in order to avoid a violation.

Waste cleaned up by on-site personnel shall be stored inside the garage in a closed container (five-gallon bucket or 55-gallon drum typically) and disposed of via a Department of Administrative Services (DAS) on-call contract. The closed container shall be labeled per Hazard Communication (HAZCOM) requirements. If any non-absorbed liquids are present, place container on a spill pallet.

Waste cleaned up by a DAS contractor will be disposed of by that contractor. For assistance on waste disposal, garage personnel shall contact the OEC.

At any time, including off-hours, a dedicated cell phone has been set up for OEC to receive spill response calls.

- CT DOT OEC Spill Phone 860-690-7509

Environmental Compliance will mobilize contractors for spill response.

Garage personnel must record the information related to all small spills on the *Spill Report log*. The *Spill Report* log is included in this section for recording the information related to these types of small spills.

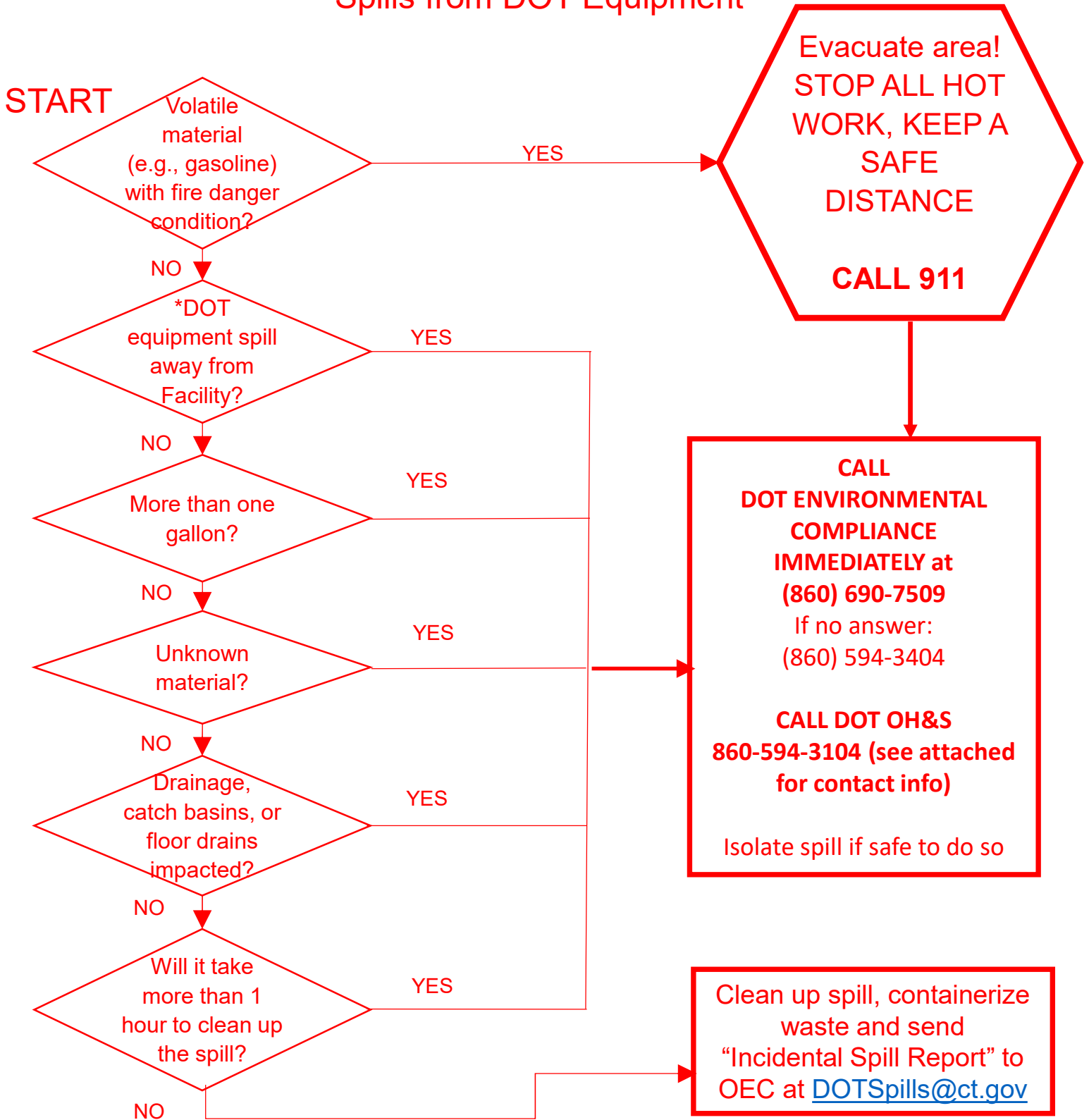
For spills requiring notification to OEC and the mobilization of a spill response contractor, OEC and/or its consultant will provide the garage with a more detailed Spill Report form.

Highway Operations will continue to receive phone calls from non-DOT agencies (e.g., State Police) related to fueling spills, particularly off-hours. An updated *Highway Operations Fuel Spill Intake Form* is attached and is for use in collecting the relevant information from the outside agencies.

4.2 PAST SPILLS AND LEAKS

Records of past spills and leaks are included in this section. **The following log must be updated to include all spills and leaks that occur after the issuance of this plan.** Make as many copies as necessary and keep the log within this section of the plan.

Spills at DOT Facilities and Spills from DOT Equipment



*DOT Equipment and DOT Facilities do NOT include Roadside Discoveries of unknown material. For containers of unknown materials found along the side of the road, contact OEC for management

Leaks (not from pumping into a vehicle but from internal parts to the containment system) less than 1 gallon may be cleaned up and waste containerized, but must be immediately reported to OEC Spill line 860-690-7509

See attached sheet for further details re: volatile materials, spill clean-up, spill isolation, contact info.

EXEMPTIONS from reporting - minor sheen from roadway, parking lot, driveway from normal vehicle use

Spills at DOT Facilities and Spills from DOT Equipment

Fire danger from volatile materials – when flammable materials such as gasoline are spilled, conditions need to be assessed to determine the fire danger. This would include volume of material released, weather and ground conditions, temperature, work occurring in the vicinity of the spill, distance to office space and enclosed areas, and any other on-site conditions that might contribute to the potential to ignite the gasoline.

OEC – DOT Office of Environmental Compliance

OH&S – DOT Division of Occupational Health and Safety

Isolate spill – in situations exceeding facility personnel's allowable cleanup volume, personnel should take action to prevent further migration of the spill WHEN it is safe to do so. This may include placement of berms or sorbent materials to prevent material from entering basins, placing booms in downstream basins to slow petroleum migration, blocking traffic on-site to keep from tracking, etc. Such measures are intended to be short term protective measures that can be completed without direct contact with the spilled material. Note: sand should not be placed into drainage structures and salt should not be used to absorb/control spills.

Waste generated from spill clean ups of less than 1 gallon and drippage must be placed in closed, intact containers and kept out of any precipitation. For volatile materials, contact OEC for further direction on waste storage. If there are any liquids remaining, container must be placed in an overpack drum or on a spill pallet.

Disposal of waste is through existing DAS contracts for the Removal and Disposal of Hazardous Waste streams and Services (currently contract # 16PSX0197). The District can assist in obtaining purchase orders for the disposal. Waste is not to be transported to a different site unless specifically instructed to do so.

Workers are never expected to exceed their level of training when responding to spills. Any questions related to training level should be discussed with the DOT Occupational Health and Safety Division.

Additional notifications:

DOT OH&S

James Ritter	860-883-3091
Michael Van Ness	860-883-3092
Morgan Kennerson	860-726-8758
Joanna Colon Figueroa	860-597-8179

Property and Facilities – damage to or leaks from fuel systems, building damage

Connecticut Department of Transportation Incidental Spill Report

Used for spills at the facility of a known material, less than 1 gallon, cleaned up within 2 hours, no drainage involvement, and no fire danger.

When did the spill happen? Date _____ Time _____

Location _____

What was spilled? _____

How much? _____

What caused the spill? _____

How was it cleaned up? _____

Was a catch basin or other drainage impacted? (Y/N) _____

Has everything been completely cleaned up and containerized? (Y/N) _____

If no, explain _____

Name _____

Phone # _____

Email the completed form to DOTSpills@ct.gov Call 860-690-7509 for assistance on spills.

SPILL LOG

Date	Spill	Leak	Brief Description (Describe location, material, quantity, source, response procedures, corrective measures, etc.)
2/30/24	✓		Truck reservoir overfilled with DEF at the fuel island at 0900. About 1/2 gallon onto concrete pad. Speedi-Dry used to soak up. Speedi-Dry swept up and disposed in refuse dumpster by 0930. Truck DEF gauge checked and driver reminded to monitor fill activities.
6/31/24	✓		Street sweeper leaked its hydraulic oil in the yard. OEC contacted at 0430. See attached summary.

SPILL LOG

Date	Spill	Leak	Brief Description (Describe location, material, quantity, source, response procedures, corrective measures, etc.)

5.0 PERIODIC SITE INSPECTIONS

Maintaining compliance with the SWPPP and SPCC plan require periodic inspections of both stormwater drainage features and material storage areas. The following sections include inspection procedures and report forms.

Garage personnel must inspect the facility's stormwater controls regularly as noted herein. Deficiencies must be noted during the inspections and corrected.

The Program Coordinator must prepare, certify and electronically submit an Annual Report to EPA and CT DEEP by April 15 each year to summarize the previous year's routine and comprehensive facility inspections. The Program Coordinator's Annual Report will be informed by the information recorded by the garage personnel on the facilities inspection forms.

5.1 WEEKLY INSPECTIONS

Garage personnel must visually inspect petroleum aboveground storage tanks (ASTs) and containers with a 55-gallon or greater capacity on a weekly basis.

The weekly inspections on petroleum containers is required as an alternative to performing routine integrity testing on each tank and drum.

The weekly AST/Container inspection log is provided on the next page. Please make as many blank copies as necessary.

Weekly inspection forms will be three-hole-punched and stored at the end of Section 5.1 for one year. Inspection forms will be subsequently retained in an accordion folder at the facility for two additional years.

WEEKLY INSPECTION LOG

For All Oil Storage Containers 55-Gallons or Larger

By signing below, you are attesting to the following:

You have personally inspected all Oil Storage Containers at the facility which have a volume of 55 gallons or larger (excluding UST's). Ensure the following:

- Not leaking
- Not bulging or dented or otherwise damaged
- Not corroding
- Double-walled or in secondary containment



Fuel-related issues should be submitted to the Fuel Control Unit using the online **Fuel Station – Repair Request** → [Repair Request Link](#)

Area	Location	Problems Noted?	Follow-up Action	Print Name Date of Inspection / Date of Follow-up Action
Drum Storage Area 1	Southeast side of garage interior	Hydraulic drum's cover bolt not secured.	Bolt tightened. Notified GS.	PRINT NAME: <u>John Smith</u>
Drum Storage Area 2	Northeast side of garage interior	Liquid accumulated in spill pallet	Checked for leaking drums, none noted Notified GS.	SIGNATURE: <u>John Smith</u>
Diesel AST	Fuel Island	none	n/a	DATE: <u>9/3/2024</u>

SEE NEXT PAGES

WEEKLY INSPECTION LOG

For All Oil Storage Containers 55-Gallons or Larger

By signing below, you are attesting to the following:

You have personally inspected all Oil Storage Containers at the facility which have a volume of 55 gallons or larger (excluding UST's). Ensure the following:

- Not leaking
- Not bulging or dented or otherwise damaged
- Not corroding
- Double-walled or in secondary containment



Fuel-related issues should be submitted to the Fuel Control Unit using the online **Fuel Station – Repair Request** → [Repair Request Link](#)

Area	Location	Problems Noted?	Follow-up Action	Print Name Date of Inspection / Date of Follow-up Action
Gasoline AST	Fuel Island			PRINT NAME:
Diesel AST	Fuel Island			
Motor Oil Drums	(3) in lube room in main facility building, (7) in stores stock room in main facility building, (11) in cold storage building, and (1) in weld shop in main facility building			SIGNATURE:
Bridge Maintenance Oil Drums	In bridge building			DATE: _____

WEEKLY INSPECTION LOG

For All Oil Storage Containers 55-Gallons or Larger

Area	Location	Problems Noted?	Follow-up Action	Print Name Date of Inspection / Date of Follow-up Action
Hydraulic Oil Drums	(3) in lube room in main facility building, (3) in stores stock room in main facility building, (4) in cold storage building, (1) in weld shop in main facility building			PRINT NAME: <hr/> SIGNATURE: <hr/> DATE: _____
Transmission Fluid Drum	Lube room in main facility building			
Biohydraulic Oil Drum	Lube room in main facility building			
Fluid Film Drum	Lube room in main facility building			
Motor Oil AST	Lube room in main facility building			
Hydraulic Oil AST	Lube room in main facility building			
Waste Oil AST	Outside of repair bay			
Waste Coolant AST	Outside of repair bay			
Diesel AST for Generator	Generator east of main facility building			
Diesel Generator Day-Tank	Generator north of bridge building			

COMPLETED WEEKLY INSPECTION LOGS

5.2 MONTHLY INSPECTIONS AND COMPREHENSIVE SITE COMPLIANCE EVALUATION CHECKLIST

The inspection form covering both monthly and semi-annual visual inspections of site conditions, material and waste storage areas and containers, and site drainage features is included in this section.

At least one of the twelve monthly inspections completed each year must be done while it is raining.

Semi-annual inspections should be made during rainfall events, if possible.

As noted on the form, additional approval and signatures are required for the semi-annual inspections. Please make as many blank copies as necessary. Completed forms must be retained for at least 3 years.

NOTE: THE INSPECTION CHECKLIST INCLUDED IN THIS SECTION IS FOR VISUAL REFERENCE ONLY. PAPER COPIES CAN BE MADE FOR EASY FIELD DOCUMENTATION; HOWEVER, FINAL INSPECTIONS SHOULD BE RECORDED AND SIGNED USING THE SITE-SPECIFIC EXCEL CHECKLIST.

[INSERT PDF OF MONTHLY INSPECTION / SEMI-ANNUAL
COMPREHENSIVE SITE COMPLIANCE EVALUATION
CHECKLIST AND REPORT]

5.3 QUARTERLY VISUAL MONITORING

Garage personnel must conduct visual monitoring of stormwater samples collected from each stormwater outfall on a quarterly basis.

Outfall sample location(s) are depicted on **Figure 2 - Stormwater Monitoring Site Plan**. Quarters begin on January 1, April 1, July 1, and October 1. Once during each quarter, a stormwater sample must be collected from each outfall and a visual assessment of these samples conducted. The visual assessment can be recorded on the online form →



[Quarterly Visual Monitoring Report](#)

If in any quarter no discharges occur (e.g., no precipitation), the visual assessment form must still be completed. If possible, at least one round of quarterly visual sampling must capture snowmelt.

Sampling equipment and procedures are outlined below.

Sampling Equipment:

- Clear plastic container (preferably one for each sampling location).
- Chemical Resistant Gloves
- Site specific supplies needed to collect the sample (ex. Bailer, rope) or access the sample location (ex. Manhole pick, crowbar).
 - [Manhole pick/crowbar, sampling stick](#)

Sampling Procedure:

- Put on chemical resistant gloves to protect hands from possible pollutants.
- Carefully collect a stormwater sample from each sample location in a dedicated clear plastic container.
- Fill the container with as much water as possible avoiding settled sediment from the bottom of sumps or outfalls (free-floating sediment is OK).
- The stormwater sample representative of current discharge conditions should be observed in a well-lit area for the following parameters as listed on the Visual Monitoring Report Form:
 - Color – (Brown, black, gray, white, etc.)
 - Odor – (Examples: Rotten eggs, sewage, gas, chemical, sour)
 - Clarity – (scaled 1-5; 1 = clear as day, 5 = dark as a freshly paved road)

- Floating Solids – (None, trace, significant)
- Settled Solids – (None, trace, significant)
- Suspended Solids – (None, trace, significant)
- Foam – (Yes/No)
- Oil Sheen – (Yes/No)
- Other Indicators of Pollution – (Visible oil product or oil beading, blobs of color, etc. Naturally occurring items like leaf litter or twigs is OK)

Record observations on the reporting form then dispose of the stormwater sample. Retain the clear plastic container for future use.

If there is any unusual substance or cloudiness in the sample, call the Office of Environmental Compliance (860-594-3404) for assistance.



Outfall #002 located on the northeast of the Site. Outlet pipe within the catch basin structure is Outfall #002.



Outfall #002 located on the northeast of the Site. Outlet pipe within the catch basin structure is Outfall #002.



Outfall #003 located on the east of the Site. Outlet pipe within the catch basin structure is Outfall #003.



Outfall #003 located on the east of the Site. Outlet pipe within the catch basin structure is Outfall #003.



Outfall #004 located on the west of the Site. 15" RCP at the toe of the slope behind the Bridge Building.



Outfall #004 located on the west of the Site. 15" RCP at the toe of the slope behind the Bridge Building.

QUARTERLY STORMWATER VISUAL MONITORING REPORT FORM

FINAL RECORD OF INSPECTION WILL BE SUBMITTED USING THE DIGITAL FORM

DATE: 9/31/24 WEATHER CONDITIONS: Rain Snow Apprx. Temp. 65 SNOW COVER?: YES NO

Outfall	Color	Odor (Y/N, if Y, describe)	Clarity	Floating Solids (Y/N)	Suspended Solids (Y/N)	Settled Solids (Y/N)	Foam (Y/N)	Oil Sheen (Y/N)	Other Obvious Indicators of Pollution
001	None	N	clear	Y	N	N	Y	N	
002	Whitish	Y soapy odor	cloudy	N	N	N	N	N	
003	Light brownish	N	Thick	N	Y	Y	N	N	

Inspected By: _____

DATE: _____ WEATHER CONDITIONS: Rain Snow Apprx. Temp. ____ SNOW COVER?: YES NO

Outfall	Color	Odor (Y/N, if Y, describe)	Clarity	Floating Solids (Y/N)	Suspended Solids (Y/N)	Settled Solids (Y/N)	Foam (Y/N)	Oil Sheen (Y/N)	Other Obvious Indicators of Pollution
002									
003									
004									

Inspected By: _____

WEEKLY INSPECTION LOG

For All Oil Storage Containers 55-Gallons or Larger

By signing below, you are attesting to the following:

You have personally inspected all Oil Storage Containers at the facility which have a volume of 55 gallons or larger (excluding UST's). Ensure the following:

- Not leaking
- Not bulging or dented or otherwise damaged
- Not corroding
- Double-walled or in secondary containment



Fuel-related issues should be submitted to the Fuel Control Unit using the online **Fuel Station – Repair Request** → [Repair Request Link](#)

Area	Location	Problems Noted?	Follow-up Action	Print Name Date of Inspection / Date of Follow-up Action
Drum Storage Area 1	Southeast side of garage interior	Hydraulic drum's cover bolt not secured.	Bolt tightened. Notified GS.	PRINT NAME: <i>John Smith</i> <hr/> SIGNATURE: <i>John Smith</i> <hr/> DATE: <i>9/3/2024</i> <hr/>
Drum Storage Area 2	Northeast side of garage interior	Liquid accumulated in spill pallet	Checked for leaking drums, none noted Notified GS.	
Diesel AST	Fuel Island	none	n/a	
Gasoline AST	Fuel Island			PRINT NAME: <hr/> SIGNATURE: <hr/> DATE: _____ <hr/>
Diesel AST	Fuel Island			
Motor Oil Drums	(3) in lube room in main facility building, (7) in stores stock room in main facility building, (11) in cold			

WEEKLY INSPECTION LOG

For All Oil Storage Containers 55-Gallons or Larger

	storage building, and (1) in weld shop in main facility building			<p>PRINT NAME: _____</p> <p>SIGNATURE: _____</p> <p>DATE: _____</p>
Bridge Oil Drums	In bridge building			
Hydraulic Oil Drums	(3) in lube room in main facility building, (3) in stores stock room in main facility building, (4) in cold storage building, (1) in weld shop in main facility building			
Transmission Fluid Drum	Lube room in main facility building			
Biohydraulic Oil Drum	Lube room in main facility building			
Fluid Film Drum	Lube room in main facility building			
Motor Oil AST	Lube room in main facility building			
Hydraulic Oil AST	Lube room in main facility building			
Waste Oil AST	Outside of repair bay			
Waste Coolant AST	Outside of repair bay			
Diesel AST for Generator	Generator east of main facility building			

WEEKLY INSPECTION LOG
For All Oil Storage Containers 55-Gallons or Larger

Diesel Generator Day-Tank	Generator north of bridge building			
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COMPLETED WEEKLY INSPECTION LOGS

5.2 MONTHLY INSPECTIONS AND COMPREHENSIVE SITE COMPLIANCE EVALUATION CHECKLIST

The inspection form covering both monthly and semi-annual visual inspections of site conditions, material and waste storage areas and containers, and site drainage features is included in this section.

At least one of the twelve monthly inspections completed each year must be done while it is raining.

Semi-annual inspections should be made during rainfall events, if possible.

As noted on the form, additional approval and signatures are required for the semi-annual inspections. Please make as many blank copies as necessary. Completed forms must be retained for at least 5 years.

NOTE: THE INSPECTION CHECKLIST INCLUDED IN THIS SECTION IS FOR VISUAL REFERENCE ONLY. PAPER COPIES CAN BE MADE FOR EASY FIELD DOCUMENTATION; HOWEVER, FINAL INSPECTIONS SHOULD BE RECORDED AND SIGNED USING THE SITE-SPECIFIC EXCEL CHECKLIST.

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

DATE: WEATHER CONDITIONS: Dry Rain Snow Appx. Temp: SNOW COVER?: YES NO SITE NO.: 0083-1

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
HIGHWAY MAINTENANCE			
VEHICLE AND EQUIPMENT FUELING, MAINTENANCE, CLEANING AND STORAGE			
Fuel Island (Gasoline, Diesel, w/ DEF)	Evidence of release or spill (drips, stains on concrete pad)		
	Dispenser pump and hoses not intact/in need of repair		
	Spill cleanup kits missing supplies		
Outdoor Vehicle/Equipment Parking and Storage Areas	Ground surface dirty		
	Vehicles and equipment stored outside in need of maintenance (not in good working condition)		
	Drips, stains or other evidence of release or spill observed		
	Chemical or petroleum containers stored outside proper containment		
Vehicles Awaiting Maintenance	Leaking/dripping vehicle stored outside on an unpaved surface OR outside on a paved surface without spill pans and/or absorbent pads placed under leak		
Interior Vehicle/Equipment/ Storage Areas	Floor drains/trench drains have visible oily debris and/or sand building up		
	Floor drains backing up into garage / Oil/water separator not functioning properly		
	Leaking vehicles with no drip pans		
Wash Bay	Floor drains/trench drains have visible oily debris and/or sand building up		
	Wash water outside the bay door		
SALT AND DEICER STORAGE AND HANDLING			
Salt Storage Shed	Salt trail outside of shed entrance		
	Loose salt in areas outside the shed not otherwise covered		
	Haybales missing/falling apart at salt shed		
	Roof leaks or other structural damage		
Liquid Deicing Chemical AST	Signs of deterioration or damage: tank spiderweb cracks/dents/gauges/distortions (include tank seams, gaskets, valves)		
	Hoses and fittings showing signs of wear or corrosion		
	Valves not functioning or not left closed and secure when not in use		
	Discharge/signs of leakage (around tank, on concrete pad, etc.)		
	Liquid level gauge not operational / unreadable		
	Surrounding Jersey barriers/concrete block to prevent collisions with the tank not placed where needed		

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
MATERIAL STORAGE AND HANDLING			
Drum Storage Inside Garage Bays	No proper labelling		
	Containers not fully closed with covers and bungs closed and secure (when not in use)		
	Evidence of release, debris, or other fire hazards in containment storage area		
	Containers of liquids not on a spill pallet / outside containment area (e.g. caged area with berm, on containment trench, in cabinet stored away from floor drains)		
	Spill pallet loaded beyond capacity		
	Liquid accumulated in spill pallets		
	Drums and containers stacked on containment in a way that they could tip over		
	Spill cleanup kits missing supplies		
Outdoor Material Storage Areas	Outdoor areas unswept/disorganized/messy		
	Outdoor chemical storage area not documented in the ICP/SWPPP		
	Plows/trailers disorganized		
	Stone disorganized		
WASTE MANGEMENT AREAS			
Dumpsters (Used oil filters, used oily debris)	Covers and drain plugs missing or damaged		
	Evidence of release from dumpster		
	Area lacking good housekeeping		
STORMWATER MANGMENT FEATURES AND STRUCTURAL CONTROLS			
Outfall #002 (Manhole northeast of the main facility building)	Dry weather flow		
	Quality of flow: oily sheen, foam, cloudy water, litter or debris		
	Odors or other obvious indicators of pollution		
Outfall #003 (Catch basin south of the main facility building)	Dry weather flow		
	Quality of flow: oily sheen, foam, cloudy water, litter or debris		
	Odors or other obvious indicators of pollution		
Catch Basins	Grate and collar are in damaged/ in need of repair		
	Solids build up in catch basin (½ full of solids or more? Less than one-foot of freeboard between bottom of lowest pipe and top of sediment build up?)		
	Obstructions or floating debris (e.g., plastic bottles)		
	Oil sheen or other indicators of possible contamination or release to storm drains		

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
Hydrodynamic Separator	Solids/sediment build-up (half full of solids or more?)		
	Absorbent pads deteriorated or missing		
	Oily sheen on water surface/petroleum odor in tank		
Detention basin	Oil sheen or other indicators of possible contamination or release to storm drains		
	Litter or debris		
	Solids build up in detention basin (½ full of solids or more)		
	Basin outlet is not free-flowing and/or blocked with sediment or debris		
	Pipes, spill way, headwalls are damaged/deteriorated/in need of repair		
On-Site Wetlands	Problems in wetlands		
Stormwater Outfalls	Maintenance needed		
	Solids build up		
	Obstructions		
	Oil sheen or other indicators of possible contamination		
Site Erosion	Evidence of soil erosion		
Spill Response Supplies	Response supplies not accessible		
	Spill cleanup kits missing supplies		
Recordkeeping	Oil/water separator inspection and clean-out recordkeeping not up to date		
	SWPPP, SPCC does not reflect site conditions		
BRIDGE MAINTENANCE			
VEHICLE AND EQUIPMENT FUELING, MAINTENANCE, CLEANING AND STORAGE			
Outdoor Vehicle/Equipment Parking and Storage Areas	Ground surface dirty		
	Vehicles and equipment stored outside in need of maintenance (not in good working condition)		
	Drips, stains or other evidence of release or spill observed		
	Chemical or petroleum containers stored outside proper containment		
Vehicles Awaiting Maintenance	Leaking/dripping vehicle stored outside on an unpaved surface OR outside on a paved surface without spill pans and/or absorbent pads placed under leak		

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
Interior Vehicle/Equipment/ Storage Areas	Floor drains/trench drains have visible oily debris and/or sand building up		
	Floor drains backing up into garage / Oil/water separator not functioning properly		
	Leaking vehicles with no drip pans		
Wash Bay	Floor drains/trench drains have visible oily debris and/or sand building up		
	Wash water outside the bay door		
MATERIAL STORAGE AND HANDLING			
Drum Storage Inside Garage Bays	No proper labelling		
	Containers not fully closed with covers and bungs closed and secure (when not in use)		
	Evidence of release, debris, or other fire hazards in containment storage area		
	Containers of liquids not on a spill pallet / outside containment area (e.g. caged area with berm, on containment trench, in cabinet stored away from floor drains)		
	Spill pallet loaded beyond capacity		
	Liquid accumulated in spill pallets		
	Drums and containers stacked on containment in a way that they could tip over		
	Spill cleanup kits missing supplies		
Outdoor Material Storage Areas	Outdoor areas unswept/disorganized/messy		
	Outdoor chemical storage area not documented in the ICP/SWPPP		
	Traffic items/cones disorganized		
	Asphalt millings not covered		
	Asphalt cold patch not covered		
	Metal storage/steel disorganized		
	Concrete/block disorganized		
	Stone/stone dust disorganized		
	Stone/cruhsed stone/stone dust disorganized		
	Tree trunks/woodchips disorganized		
	ADS pipe disorganized		
	Lead paint debris drums disorganized		
WASTE MANGEMENT AREAS			
Dumpsters (General Refuse, Scrap Metal, Asphalt)	Covers and drain plugs missing or damaged		
	Evidence of release from dumpster		
	Area lacking good housekeeping		

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
Lead Paint Debris Drum	Covers are not on or not secure		
STORMWATER MANGMENT FEATURES AND STRUCTURAL CONTROLS			
Outfall #001 (15" RCP)	Dry weather flow		
	Quality of flow: oily sheen, foam, cloudy water, litter or debris		
	Odors or other obvious indicators of pollution		
Catch Basins	Grate and collar are in damaged/ in need of repair		
	Solids build up in catch basin (½ full of solids or more? Less than one-foot of freeboard between bottom of lowest pipe and top of sediment build up?)		
	Obstructions or floating debris (e.g., plastic bottles)		
	Oil sheen or other indicators of possible contamination or release to storm drains		
Hydrodynamic Separator	Solids/sediment build-up (half full of solids or more?)		
	Absorbent pads deteriorated or missing		
	Oily sheen on water surface/petroleum odor in tank		
Detention basin	Oil sheen or other indicators of possible contamination or release to storm drains		
	Litter or debris		
	Solids build up in detention basin (½ full of solids or more)		
	Basin outlet is not free-flowing and/or blocked with sediment or debris		
	Sediment or debris blocking the pipes draining into the basin		
	Pipes, spill way, headwalls are damaged/deteriorated/in need of repair		
On-Site Wetlands	Problems in wetlands		
Stormwater Outfalls	Maintenance needed		
	Solids build up		
	Obstructions		
	Oil sheen or other indicators of possible contamination		
Site Erosion	Evidence of soil erosion		
Spill Response Supplies	Response supplies not accessible		
	Spill cleanup kits missing supplies		

**MONTHLY / SEMI-ANNUAL
 SITE COMPLIANCE
 CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
Recordkeeping	Oil/water separator inspection and clean-out recordkeeping not up to date		
	SWPPP, SPCC does not reflect site conditions		

**MONTHLY / SEMI-ANNUAL
SITE COMPLIANCE
CHECKLIST AND REPORT**

Area Checked:	Checked for:	Problems?	If answered "yes", describe problems observed, follow-up corrective action, and date of action.
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HIGHWAY MAINTENANCE

Inspected by X
Garage Supervisor: _____
Inspector (Include specific Operating Unit if ...)

BRIDGE MAINTENANCE

Inspected by X
Bridge Garage Supervisor: _____
Inspector (Include specific Operating Unit if ...)

"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 the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute."

Additional approval and signatures required below for semi-annual inspections only.

Approved by:

District Maintenance Manager X
(Electrical/Highway/Signs&Markings, as applicable): _____
District Maintenance Manager

Bridge Maintenance Manager: X

Bridge Maintenance Manager

Equipment Repair Manager: X

Transportation Materials Storage Supervisor: X

Transportation Materials Storage Supervisor:

Personnel Changes	
Title	Name

Received by OEC: X
_____ OEC Transportation Engineer/Planner

5.3 QUARTERLY VISUAL MONITORING

Garage personnel must conduct visual monitoring of stormwater samples collected from each stormwater outfall on a quarterly basis.

Outfall sample location(s) are depicted on **Figure 2 - Stormwater Monitoring Site Plan**. Quarters begin on January 1, April 1, July 1, and October 1. Once during each quarter, a stormwater sample must be collected from each outfall and a visual assessment of these samples conducted. The visual assessment can be recorded on the online form →



[Quarterly Visual Monitoring Report](#)

If in any quarter no discharges occur (e.g., no precipitation), the visual assessment form must still be completed. If possible, at least one round of quarterly visual sampling must capture snowmelt.

Sampling equipment and procedures are outlined below.

Sampling Equipment:

- Clear plastic container (preferably one for each sampling location).
- Chemical Resistant Gloves
- Site specific supplies needed to collect the sample (ex. Bailer, rope) or access the sample location (ex. Manhole pick, crowbar).
 - Manhole pick/crowbar, sampling stick

Sampling Procedure:

- Put on chemical resistant gloves to protect hands from possible pollutants.
- Carefully collect a stormwater sample from each sample location in a dedicated clear plastic container.
- Fill the container with as much water as possible avoiding settled sediment from the bottom of sumps or outfalls (free-floating sediment is OK).
- The stormwater sample representative of current discharge conditions should be observed in a well-lit area for the following parameters as listed on the Visual Monitoring Report Form:
 - Color – (Brown, black, gray, white, etc.)
 - Odor – (Examples: Rotten eggs, sewage, gas, chemical, sour)
 - Clarity – (scaled 1-5; 1 = clear as day, 5 = dark as a freshly paved road)

- Floating Solids – (None, trace, significant)
- Settled Solids – (None, trace, significant)
- Suspended Solids – (None, trace, significant)
- Foam – (Yes/No)
- Oil Sheen – (Yes/No)
- Other Indicators of Pollution – (Visible oil product or oil beading, blobs of color, etc. Naturally occurring items like leaf litter or twigs is OK)

Record observations on the reporting form then dispose of the stormwater sample. Retain the clear plastic container for future use.

If there is any unusual substance or cloudiness in the sample, call the OEC (860-594-3404) for assistance.



Outfall #001 located on the west of the Site. 15" RCP at the toe of the slope behind the Bridge Building.



Outfall #001 located on the west of the Site. 15" RCP at the toe of the slope behind the Bridge Building.



Outfall #002 located on the northeast of the Site. Outlet pipe within the manhole structure is Outfall #002.



Outfall #003 located on the east of the Site. Outlet pipe within the catch basin structure is Outfall #003.



Outfall #003 located on the east of the Site. Outlet pipe within the catch basin structure is Outfall #003.

QUARTERLY STORMWATER VISUAL MONITORING REPORT FORM

FINAL RECORD OF INSPECTION WILL BE SUBMITTED USING THE DIGITAL FORM

DATE: 9/31/24 WEATHER CONDITIONS: Rain Snow Apprx. Temp. 65 SNOW COVER?: YES NO

Outfall	Color	Odor (Y/N, if Y, describe)	Clarity	Floating Solids (Y/N)	Suspended Solids (Y/N)	Settled Solids (Y/N)	Foam (Y/N)	Oil Sheen (Y/N)	Other Obvious Indicators of Pollution
001	None	N	clear	Y	N	N	Y	N	
002	Whitish	Y soapy odor	cloudy	N	N	N	N	N	
003	Light brownish	N	Thick	N	Y	Y	N	N	

Inspected By: _____

DATE: _____ WEATHER CONDITIONS: Rain Snow Apprx. Temp. ____ SNOW COVER?: YES NO

Outfall	Color	Odor (Y/N, if Y, describe)	Clarity	Floating Solids (Y/N)	Suspended Solids (Y/N)	Settled Solids (Y/N)	Foam (Y/N)	Oil Sheen (Y/N)	Other Obvious Indicators of Pollution
001									
002									
003									

Inspected By: _____

INTEGRATED CONTINGENCY PLAN (ICP)

**VOLUME II
REGULATORY COMPLIANCE**

**STATE OF CONNECTICUT DEPARTMENT OF
TRANSPORTATION**

**MILFORD MAINTENANCE & REPAIR & BRIDGE
GARAGES**

**44 BANNER DRIVE MILFORD, CT 06460
0083-1**

**STORMWATER POLLUTION PREVENTION
PLAN (SWPPP)**

and

**SPILL PREVENTION CONTROL and
COUNTERMEASURE PLAN
(SPCC)**

JANUARY 2026

**INTEGRATED CONTINGENCY PLAN (ICP)
REGULATORY COMPLIANCE**

**MILFORD MAINTENANCE & REPAIR & BRIDGE
GARAGES**

MILFORD, CONNECTICUT

CTDOT Project Number: 442-8420

Prepared for

State of Connecticut Department of Transportation
Newington, Connecticut

Prepared by

HRP Associates, Inc.

January 2026

197 Scott Swamp Road,
Farmington, Connecticut 06032
Phone: (860) 674-9570

PREFACE

This Integrated Contingency Plan (ICP) has been developed for the Connecticut Department of Transportation (CTDOT). The ICP addresses:

- Connecticut Department of Energy and Environmental Protection (CT DEEP) requirements for the preparation of a Stormwater Pollution Prevention Plan (SWPPP) as per the condition of the General Permit for the Discharge of Stormwater Associated with Industrial Activity (the “General Permit”).
- The U.S. Environmental Protection Agency (EPA) oil pollution prevention regulations Title 40 of the Code of Federal Regulations (CFR) Part 112 (40 CFR 112) requirements for the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan.

Volume II is divided into three parts: Part 1 includes general information and procedures common to both the SWPPP and SPCC Plan; Part 2 covers SWPPP-specific material; and Part 3 addresses concerns specific to the requirements of an SPCC Plan. A complete copy of the ICP is maintained at the facility and is available onsite for review during normal working hours.

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Registration Form, Certificate of Registration, and Authorization Letter**

Appendix B Internal Spill Documentation Form

Appendix C Report of Petroleum or Chemical Product Discharge, Spillage or Release

Appendix D List of SPCC-Regulated Amendments

Appendix E List of Corrective Actions, Reports, and Documentation

PART 1

INFORMATION COMMON TO SWPPP

AND SPCC

1 GENERAL FACILITY INFORMATION

1.1 FACILITY DESCRIPTION

Facility Name:	Milford Maintenance & Repair & Bridge Garages
Facility Address:	44 Banner Drive Milford, CT 06460
Owner:	State of Connecticut Department of Transportation
Owner Address:	2800 Berlin Turnpike Newington, CT 06111
Facility Activities:	This facility is located on 20.08 acres (approximately 8.81 acres are developed and in use).

The main facility is responsible for general roadway maintenance including plowing, removal of road debris, and roadway maintenance, along with stocking and distributing materials and equipment needed for all work conducted at Connecticut Department of Transportation (CTDOT) Highway Operation facilities, and the maintenance and repair of the state highway electrical system; the bridge facility is responsible for maintaining and performing repair work for the state's bridge infrastructure.

Industrial activities at this highway maintenance facility include a solid and liquid deicing materials storage, vehicle fueling, vehicle washing, various materials storage for the maintenance and upkeep of the state highway system, and vehicle and equipment maintenance limited to topping off operating fluids such as fuel, engine oil, antifreeze, transmission fluid, hydraulic oil, Diesel Exhaust Fluid (DEF), bridge oil, biohydraulic oil, and fluid film. Material storage is located in various locations throughout the facility and generally includes sand, metal/steel, cold patch asphalt, general refuse debris, stone/crushed stone, stone dust, concrete/block, asphalt/millings, tree trunks/woodchips, ADS pipe, traffic items/cones, plows/trailers, lead paint debris, and resin.

REPAIR: Repair is responsible for fleet vehicle and equipment maintenance, including mechanical repairs and body and refinishing work. Industrial activities at the facility include vehicle maintenance, vehicle fueling, and materials storage. Vehicles and

equipment from CTDOT's various state-wide garages are brought to Repair facilities where they await repair, resale, or scrap disposal. Material storage include engine oil, antifreeze, transmission fluid, solvents, hydraulic oil, and water-based cleaners. Waste automotive fluids are collected and containerized prior to shipping offsite for appropriate disposal.

MATERIALS STORAGE: Materials Storage ("Stores") facilities stock and distribute materials and equipment needed for all work conducted at CTDOT Highway Operation facilities. Activities include storage of virgin vehicle maintenance and repair fluids including petroleum products and solvents; new lead-acid batteries; used lead-acid batteries for offsite recycling/reclaiming; vehicle parts and attachments; temporary traffic-control equipment (cones, barrels); and galvanized metal posts and guide rail. Activities include loading and unloading material and equipment deliveries from distributors and CTDOT's Materials Storage Satellite Facilities [and the Rocky Hill Central Warehouse].

BRIDGE MAINTENANCE: Bridge Maintenance is responsible for maintaining and performing repair work for the state's bridge infrastructure. Industrial activities at the facility include vehicle fueling and materials storage. Vehicles and equipment stored onsite include pickup trucks, excavators, skid steers, cement mixers, specialty vehicles, and boats. Raw material storage includes chain-linked fence, cold patch, plug joint material, bridge paint, oxy concrete, Portland cement, Kwik bond, tack coat, welding rod, release agents, vehicle/equipment fuel, and hydraulic oil. Waste management activities includes storing scrap metal for recycling, asphalt-coated metal plug joints and other demolition-related debris, [and RCRA-regulated debris recovered from field preparation (i.e., needle-gun) of painted steel beams].

ELECTRICAL: Electrical is responsible for the maintenance and repair of the state highway electrical system. The facility stores the equipment and materials used in field installations and repairs along the highway ROW. Materials storage includes aluminum poles, galvanized conduit, cable duct, wire, LED lighting components.

The facility has five permanent structures, including a maintenance & repair building, two salt sheds, bridge maintenance building, and

cold storage building.

The facility operates under Standard Industrial Classification (SIC) Code 9199, General Government, Not Otherwise Classified and North American Industry Classification System (NAICS) Code 921190 Other General Government Support. The facility is considered an industrial facility under the General Permit's Sector AF (Federal, State, or Municipal Government Fleet) and includes vehicle repair.

- The Site is not located within an Aquifer Protection Area (Connecticut Environmental Conditions Online (CT ECO), 2024) and does not utilize a groundwater infiltration system when managing runoff.
- The site is an area with a groundwater classification of GB.
- The site is located within the Coastal Boundary. The site's location and use are consistent with the goals and policies of C.G.S. Sec. 22a-92 and will not cause adverse impacts to coastal resources as defined in C.G.S. Section 22a-93(15).
- Implementation of this Plan will have no potential impacts to historic properties.
- Portions of the site and its discharge locations fall within the approximate locations of endangered, threatened, and special concern species and important natural communities in Connecticut, as depicted on Connecticut Department of Energy and Environmental Protection's (CT DEEP) June 2025 Natural Diversity Data Base (NDDDB) map. The facility has an existing General Permit registration that precedes the issuance date of the most recent General Permit.
- The site does not discharge to a high quality water. A high quality water is defined as any surface water where the water quality is better than the minimum criteria for its designated use. New or increased discharges to high quality waters shall be made in accordance with the Connecticut Anti-Degradation Policy in the Connecticut Water Quality Standard and control measures used to prevent the discharge to surface water will be documented.

- The facility maintains an existing discharge to an impaired water (Section 4.5.5). The facility shall not cause new or increased discharges to the impaired water unless it can be demonstrated that there will be no net increase in loading to the impaired water of the pollutant(s) for which the waterbody is impaired.

Facility Drainage
and Distance to
Navigable Waters:

There are four drainage areas (DAs) onsite with industrial activity. Each DA is described below.

Drainage Area 001: Stormwater collected through a series of catch basins as well roof drains from the bridge maintenance building pass through a hydrodynamic separator before discharging into the detention basin in the southwestern part of the site. Runoff from the outside storage areas also contribute to the detention basin via overland sheet flow. The overflow from the detention basin then discharges to the monitored Outfall 001 where it discharges into a wooded area on the western portion of the site and eventually to the Indian River. The area contains two permanent structures: the bridges maintenance garage and a salt shed. The area also includes the repair & maintenance storage yard and associated cones, cold patch, steel, block, plow, and stone dust storage, the electrical storage yard and associated metal storage, lead paint debris drums, asphalt hot box, scrap metal bins, brine tank, bridges parts yard and associated scrap metal/aluminum, water tanks, ADS pipe, general refuse dumpster, scrap aluminum dumpster, scrap steel roll-off, asphalt dumpster, and additional material storage such as cold patch, stone, riprap, sand, concrete debris, asphalt/millings, tree trunks/woodchips, and general refuse debris.

Drainage Area 002: This DA consists of two sub-DAs that discharge at the same location. DA 002A captures runoff from the southern end of the main facility building roof drains, and from catch basins in the paved portion of the site adjacent to the southeastern end of the main facility building. The runoff is discharged to a detention basin east of the main facility building, with the southernmost runoff discharging through a hydrodynamic separator prior to discharge to the detention basin. The detention basin then discharges via stormsewer to DA 002B.

Drainage Area 002B: Runoff from the is conveyed via the northern portion of the main facility building roof discharge, catch basins/stormsewers (including the discharge from the DA 002A detention basin) adjacent to the northeastern portion of the main facility

building, and overland flow. The runoff discharges to a manhole at the northeast corner of the main facility building, designated as Outfall 002 which eventually discharges to the Indian River. An adjacent, private property also has an interconnection into this storm sewer network. The monitoring location is upstream of the outfall due to inaccessibility of the outfall.

These areas contain three permanent structures: the main facility building, a salt shed, and a cold storage building. The area also includes truck mounted salt brine tank, plows/trailers, stone, and used oily waste dumpsters.

Drainage Area 003: This DA consists of three sub-DAs that discharge at the same location. DA 003A captures runoff from the paved area to the south of the main facility building and the southern portion of the maintenance bay roof. Runoff is conveyed via a series of stormsewer structures, where it is monitored at a catch basin in the parking area prior to being conveyed to Banner Drive. DA 003A then discharges to DA 003B.

Drainage Area 003B captures runoff from the Connecticut Turnpike (I-95) and State Route 708, the gravel, and paved areas in the southern portion of the site, part of the site's driveway, the end of the southern access road, and Banner drive. The discharge from DA 003A is also captured via stormsewer in DA 003B. Runoff is conveyed to DA 003C via stormsewer.

Drainage Area 003C captures overland flow from the central paved truck parking area and a portion of the site driveway and grassy areas in the central, along with the discharge from DA 003B, which then discharges to the wooded area north of the central portion of the site, where it will eventually discharge into the Indian River.

Drainage Areas 003B and 003C are not monitored because they contain no industrial activity, and/or feature stormwater input from adjacent properties, and/or do not feature a point source discharge.

These areas include one permanent structure, the maintenance section of the main facility building. The area also includes the fuel island and associated gasoline, diesel, and DEF aboveground storage tanks (ASTs), the magnesium chloride and salt brine ASTs, the main facility building generator and associated diesel belly tank, the main facility building electrical transformer, the bridge building

generator and associated diesel AST, the bridge building electrical transformer, truck storage, and vehicle parking/traffic.

Drainage Area 004: Stormwater runoff from the paved parking area to the west of the main building sheet flows into the grassy, woodland area on the western portion of the site. This area does not have a point source and runoff is anticipated to infiltrate and/or eventually discharge via overland flow to the Indian River. The area includes vehicle parking/storage and waste oil and waste antifreeze ASTs.

1.2 DRAINAGE AREA SUMMARY

Drainage Area	Total Area (ft ²)	Weighted Runoff Coefficient	Activities in Drainage Area
001	see Facility Diagram (Figure 4)	0.66	Bridges maintenance garage, salt shed; repair & maintenance storage yard and associated cones, cold patch, steel, block, plow, and stone dust storage, electrical storage yard and associated metal storage, lead paint debris drums, asphalt hot box, scrap metal bins, brine tank, bridges parts yard and associated scrap metal/aluminum, water tanks, ADS pipe, general refuse dumpster, scrap aluminum dumpster, scrap steel roll-off, asphalt dumpster, and additional material storage such as cold patch, stone, riprap, sand, concrete debris, asphalt/millings, tree trunks/woodchips, and general refuse debris.
002	see Facility Diagram (Figure 4)	0.74	Main facility building, salt shed, cold storage building; truck mounted salt brine tank, plows/trailers, stone, and used oil waste dumpsters.
003	see Facility Diagram (Figure 4)	0.57	Maintenance section of the main facility building; the fuel island and associated gasoline, diesel, and DEF ASTs, the magnesium chloride and salt brine ASTs, the main facility building generator and associated diesel belly tank, the main facility building electrical

Drainage Area	Total Area (ft ²)	Weighted Runoff Coefficient	Activities in Drainage Area
			transformer, the bridge building generator and associated diesel AST, the bridge building electrical transformer, truck storage, and vehicle parking/traffic.
004 (No monitoring location)	see Facility Diagram (Figure 4)	0.90	Vehicle parking/storage, waste oil and waste antifreeze ASTs

2 FACILITY MAPS AND DIAGRAMS

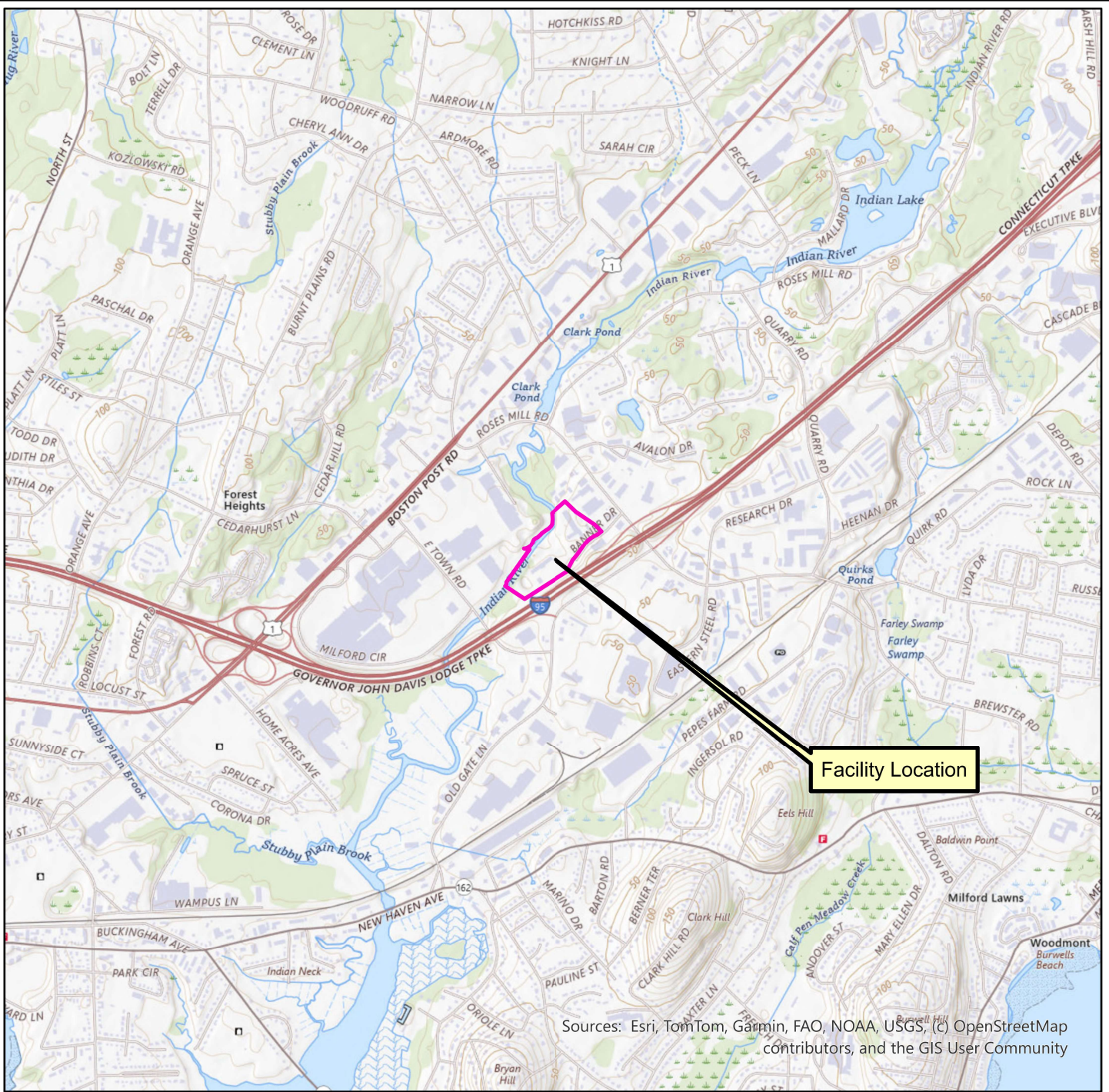
Volume I of this plan (Field Implementation) includes Figure 1 - Facility Diagram depicting indoor and outdoor storage areas, site layout and features, and catch basin locations and Figure 2 - Stormwater Monitoring Site Plan depicting locations of stormwater monitoring points (outfalls, manholes, etc.), including latitude and longitude, and flow direction on an aerial basemap.

The following pages of Volume II depict all features and information required by the General Permit under Section 4.3.2.3 and by the SPCC Rules under the Code of Federal Regulations (CFR), 40 CFR 112.7(a)(3).

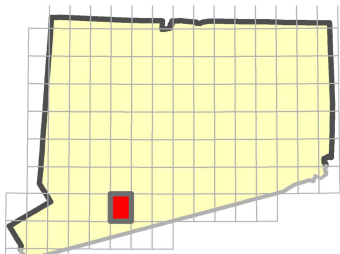
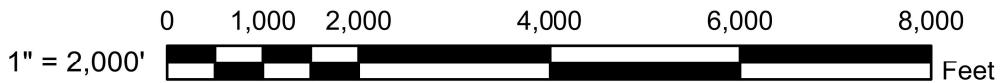
- A Facility Location Map (Figure 3), a topographic map, depicting the general location of the facility, overall site size, approximate property boundaries, the surrounding area, and receiving surface water body or bodies including the identification of any impaired waters; and
- A Facility Diagram (Figure 4) which depicts the amount of impervious coverage and an outline of the DA of each stormwater outfall including the extent of impervious surface, existing structural control measures installed to reduce pollutants in stormwater runoff, location of all stormwater conveyances including catch basins, ditches pipes and swales, the areal extent of any wetlands to which stormwater discharges, location of all stormwater monitoring points including latitude and longitude where available, locations of discharges to a municipal storm sewer system, locations of any discharges to groundwater through an infiltration system (does not exist at this site), and locations where any drainage run-on enters the site.

The Facility Diagram also includes locations where materials are exposed to precipitation, locations where major spills or leaks (identified under Section 4.3.2.4(b) of the General Permit) have occurred, and locations where the following activities are exposed to precipitation: fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas, locations used for the treatment, storage or disposal of wastes, liquid storage tanks greater than 55 gallons, processing and storage areas, de-icing material storage areas, areas with the potential for erosion that may impact surface waters or wetlands, and any other potential pollutant sources.

- A Building Diagram (Figure 5) which depicts the interior of the building(s) and the storage locations of all oil containing containers that have a capacity of 55 gallons or larger.



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (C) OpenStreetMap contributors, and the GIS User Community



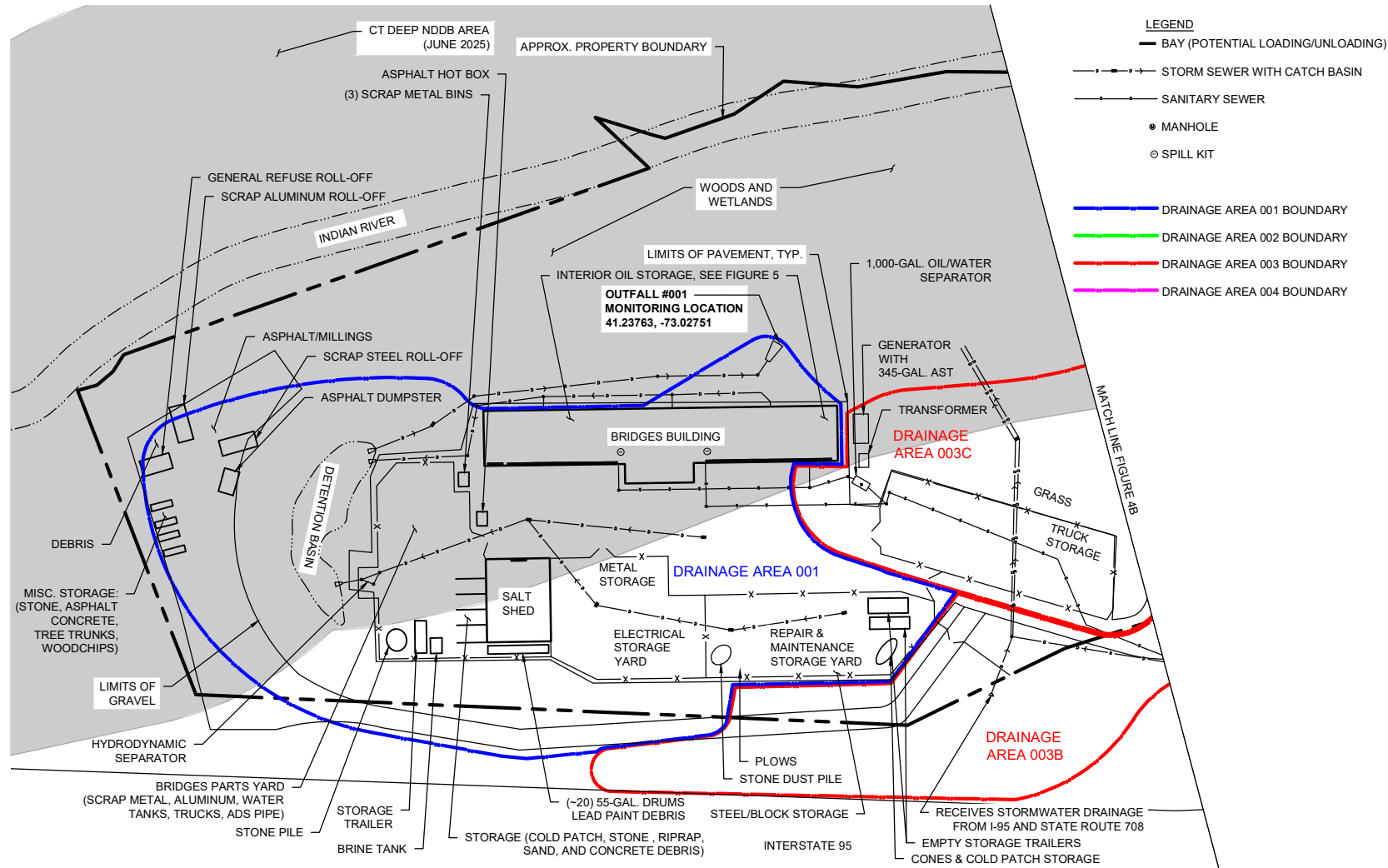
USGS Quadrangle Information
 Quad ID: 41073-B1
 Quad Name: Milford, Connecticut
 Quadrangle source:

Figure 3 - Facility Location Map
CT DOT Site No. 0083-1
Milford Maintenance &
Repair & Bridge Garages
 44 Banner Drive
 Milford, Connecticut
 HRP # CTD5093.84



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DRAWING NAME: \\hrp-c64\ShareData\C\CONDD - CONNECTICUT DEPARTMENT OF TRANSPORTATION\MULTITOWNS\MULTITOWNS\PCS\CTD509384\WP\Milford 0883-1\CAD\SITE\fig 4A.PLOT
 DATE: Feb 18, 2026 - 11:52am OPERATOR: GaeZona LAYOUT: FIGURE 4A.PLOT



LEGEND

- BAY (POTENTIAL LOADING/UNLOADING)
- STORM SEWER WITH CATCH BASIN
- SANITARY SEWER
- MANHOLE
- SPILL KIT
- DRAINAGE AREA 001 BOUNDARY
- DRAINAGE AREA 002 BOUNDARY
- DRAINAGE AREA 003 BOUNDARY
- DRAINAGE AREA 004 BOUNDARY



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DRAWN BY:	GMZ
REVIEWED BY:	KAM

ISSUE DATE:	01/29/2026
PROJECT NUMBER:	CTD5093.84
SHEET SIZE:	11"x17"

FACILITY DIAGRAM
 MILFORD MAINTENANCE & REPAIR &
 BRIDGE GARAGES
 44 BANNER DRIVE,
 MILFORD, CONNECTICUT

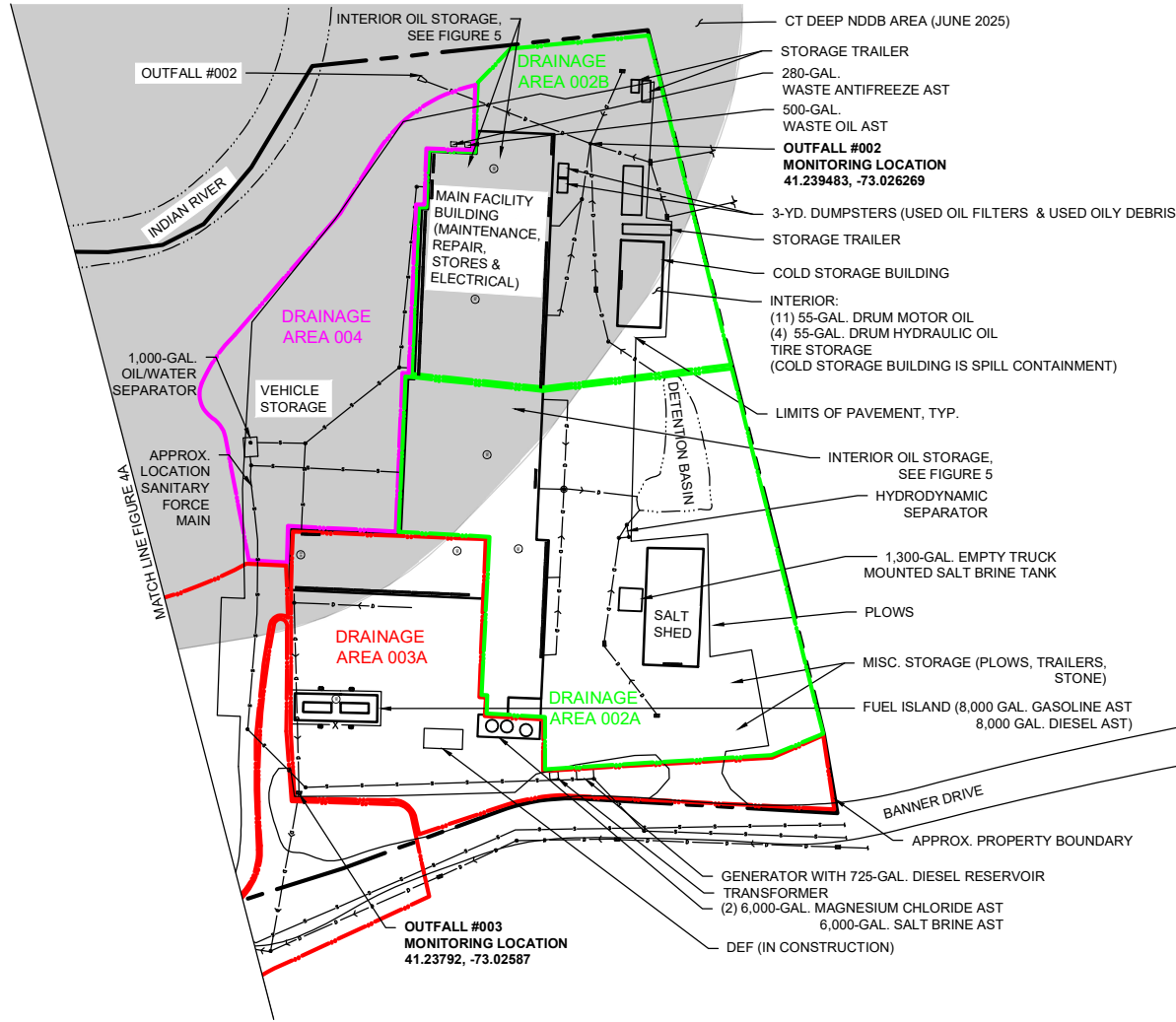
FIGURE NO.
4A

NOTES:

- IDENTIFIED SITE FEATURES, INCLUDING STORM SEWER NETWORK, ARE APPROXIMATE BASED ON FIELD OBSERVATIONS AND THE PROVIDED MAP REFERENCES. A SITE SURVEY WAS NOT PERFORMED AND ACTUAL CONDITIONS MAY VARY.
- DRAINAGE AREA 001 IMPERVIOUS COVERAGE IS APPROXIMATELY 4.94 AC (215,172 SF) ; DRAINAGE AREA 002A IMPERVIOUS COVERAGE IS APPROXIMATELY 1.36 AC (59,037 SF); DRAINAGE AREA 002B IMPERVIOUS COVERAGE IS APPROXIMATELY 1.00 AC (43,466 SF); DRAINAGE AREA 003A IMPERVIOUS COVERAGE IS APPROXIMATELY 1.07 AC (46,483 SF); DRAINAGE AREA 003B IMPERVIOUS COVERAGE IS APPROXIMATELY 1.84 AC (80,198 SF); DRAINAGE AREA 003C IMPERVIOUS COVERAGE IS APPROXIMATELY 1.66 AC (72,408 SF); DRAINAGE AREA 004 IMPERVIOUS COVERAGE IS APPROXIMATELY 0.91 AC (39,822 SF).

MAP REFERENCES:

- "FACILITY DIAGRAM, CONNECTICUT DEPARTMENT OF TRANSPORTATION, 44 BANNER DR, MILFORD, CONNECTICUT," PREPARED BY HRP ASSOCIATES, INC., SCALE 1" = 40', DATED 03/04/2020



LEGEND

- BAY (POTENTIAL LOADING/UNLOADING)
- STORM SEWER WITH CATCH BASIN
- SANITARY SEWER
- MANHOLE
- SPILL KIT
- Drainage Area 001 Boundary
- Drainage Area 002 Boundary
- Drainage Area 003 Boundary
- Drainage Area 004 Boundary

NOTES:

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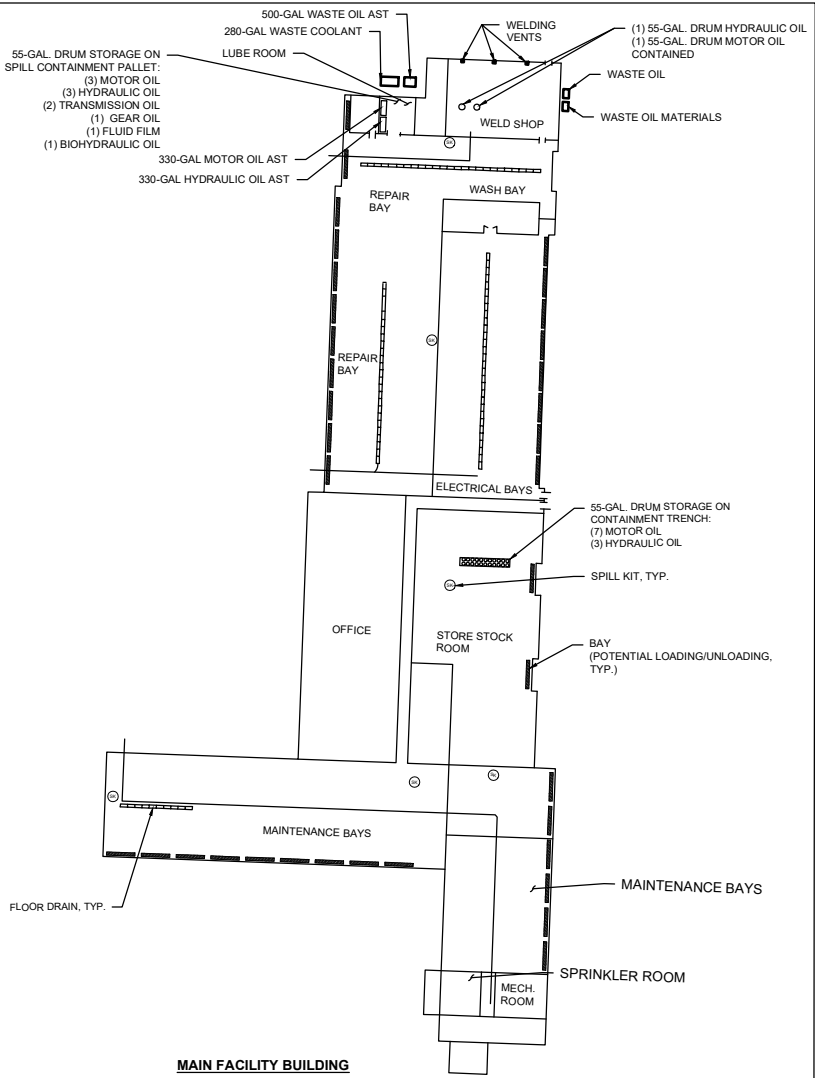
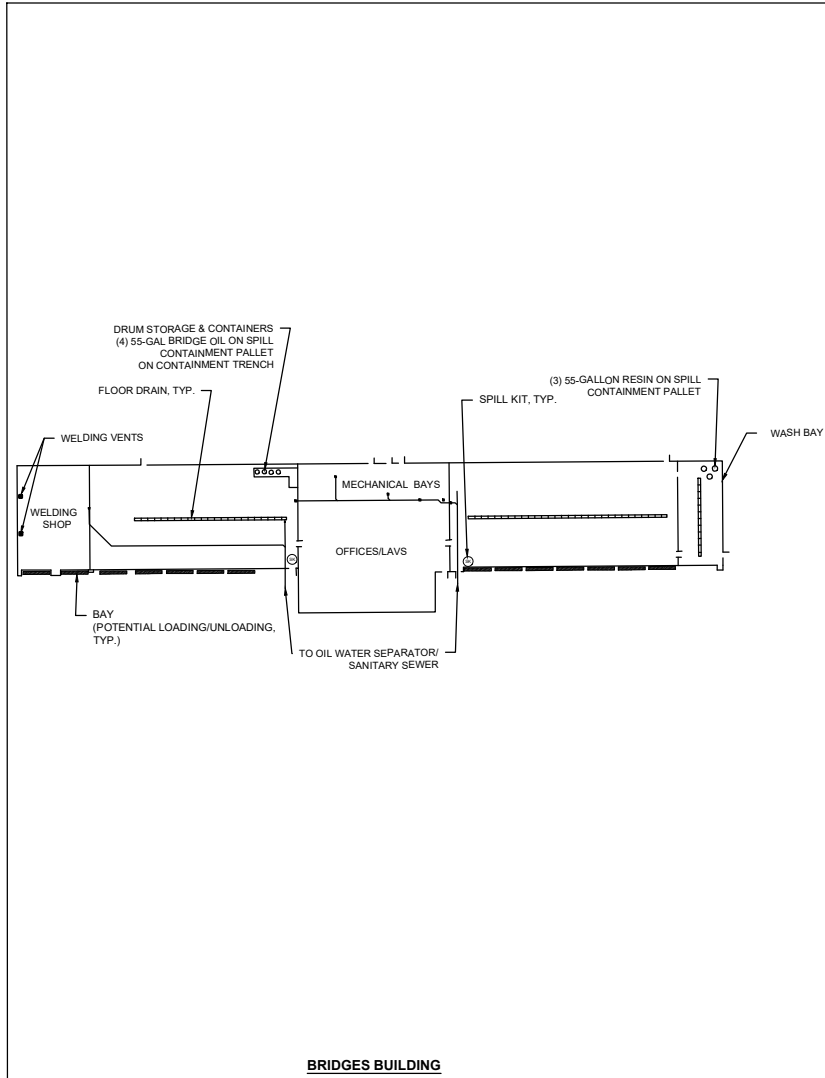
REVISIONS	
NO.	DATE

DESIGNED BY:	GMZ
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REVIEWED BY:	KAM

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PROJECT NUMBER:	CTD5093.84
SHEET SIZE:	11"x17"

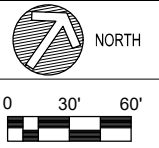
FACILITY DIAGRAM
 MILFORD MAINTENANCE & REPAIR &
 BRIDGE GARAGES
 44 BANNER DRIVE,
 MILFORD, CONNECTICUT

FIGURE NO.
4B



NOTES:
 1. IDENTIFIED SITE FEATURES, INCLUDING STORM SEWER NETWORK, ARE APPROXIMATE BASED ON FIELD OBSERVATIONS AND THE PROVIDED MAP REFERENCES. A SITE SURVEY WAS NOT PERFORMED AND ACTUAL CONDITIONS MAY VARY.

MAP REFERENCES:
 1. "FACILITY DIAGRAM, CONNECTICUT DEPARTMENT OF TRANSPORTATION, 44 BANNER DR, MILFORD, CONNECTICUT," PREPARED BY HRP ASSOCIATES, INC., SCALE 1" = 40', DATED 03/04/2020



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NO.	DATE

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BUILDING DIAGRAM
 MILFORD MAINTENANCE & REPAIR &
 BRIDGE GARAGES
 44 BANNER DRIVE,
 MILFORD, CONNECTICUT

FIGURE NO.
5

PART 2

STORMWATER POLLUTION

PREVENTION PLAN

3 SWPPP – INTRODUCTION AND PURPOSE

The U.S. Congress passed the Clean Water Act (CWA) in October 1972 with the objective to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The Water Quality Act of 1987 amended the CWA and required implementation of a comprehensive program for addressing *industrial stormwater* discharges.

CT DEEP is a delegated authority to implement the Federal CWA's National Pollutant Discharge Elimination System (NPDES) Program. CT DEEP has the authority to promulgate regulations and issue permits in accordance with state statutes. In October 1992, CT DEEP issued the first NPDES General Permit for the Discharge of Stormwater Associated with Industrial Activity. The General Permit has been reissued since most recently on October 1, 2025. The general permit requires eligible facilities to submit a registration to obtain permit coverage and develop and implement a Stormwater Pollution Prevention Plan (SWPPP). CTDOT operates facilities such as the subject site that fall under the General Permit's definition of "industrial activity". This SWPPP meets the requirements of the General Permit.

The industrial SWPPP has two major objectives:

1. To identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of stormwater discharges and authorized non-stormwater discharges from the facility.
2. To identify and implement site-specific Best Management Practices (BMPs) to reduce or prevent pollutants associated with industrial activities in stormwater discharges and authorized non-stormwater discharges.

3.1 KEEPING THE PLAN CURRENT/PLAN AMENDMENTS

This SWPPP will be amended, and all actions required by the plan will be completed within 120 days of when:

- CTDOT becomes aware that there is a change at the site which has an effect on the potential to cause pollution to the waters of the state, including, but not limited to a change in facility design, construction, operation, or maintenance; or
- Actions required by the SWPPP fail to ensure or adequately protect against pollution of the waters of the state; or
- The Commissioner (CT DEEP) requests modification of the Plan; or
- The permittee is notified that they are subject to requirements because the receiving water to which the industrial activity discharges have been designated as impaired under Section 303(d) of the CWA and as identified in the most recent State of Connecticut Integrated Water Quality Report; or
- The permittee is notified that a total maximum daily load (TMDL) to which the permittee is subject has been established for the stormwater receiving water; or

- Plan modification is necessary to address significant sources or potential sources of pollution identified as a result of visual monitoring; or
- Plan modification is required as a result of monitoring benchmark exceedances.

If significant changes are made to the site (e.g., addition of outdoor storage areas, change in facility footprint, addition/removal of control measures, etc.) the Plan will be amended and re-certified by CTDOT and a Professional Engineer.

SWPPP Certification pages will be maintained in Section 9 of the Plan.

4 SUMMARY OF POTENTIAL POLLUTANT SOURCES

A site map indicating information pertinent to potential stormwater pollution is included as Figure 4. The map indicates the general layout of the site including the outfall and the storm drainage structures. Figure 4 also indicates locations of exposed significant material, high-risk areas such as loading/unloading areas and existing structural control measures to reduce pollutants in stormwater runoff.

4.1 POTENTIAL POLLUTANT SOURCES FROM INDUSTRIAL ACTIVITIES

The locations of specific features and areas considered as the facilities potential pollutant sources are depicted in Figure 4. Details with respect to locations, number, sizes (capacity), potential pollutants, secondary containment, are included in the “Potential Pollutant Sources Table” in Volume I of this Plan. The following provides narrative descriptions regarding the potential pollutant sources.

4.1.1 VEHICLE AND EQUIPMENT FUELING, MAINTENANCE, CLEANING, AND STORAGE

Vehicle fueling and equipment fueling occurs at the exterior fuel dispensing island and is potential pollutant source due to small drips, spills and overfills that may occur during the fueling activity. Diesel fueling includes filling the vehicle’s DEF reservoir.

Vehicle maintenance, including mechanical repairs and body and refinishing work, is conducted within the covered garage bays. All fluids resulting from vehicle maintenance activities are properly collected and disposed of. All storage containers are properly maintained and labeled.

Vehicles awaiting maintenance are relocated to dedicated CTDOT vehicle repair garages or are parked onsite inside the facility garage or on paved portions of the garage facility. Vehicles awaiting maintenance are not parked on dirt/gravel parking areas.

Vehicle washing occurs within the main facility buildings and bridges building interior wash bays. The facilities contain trench drain wash water collection systems to prevent wash water from entering the stormwater drainage system. Potential stormwater exposure could be from any wash waters that are not properly contained within the wash bay and run-on to the exterior paved area.

Facility vehicles and equipment are stored generally indoors. When stored outside, this is a potential pollutant source because of the possibility of petroleum products, coolants and other chemical contaminants leaking from vehicles and equipment.

4.1.2 SOLID DEICING MATERIALS

Road salt (sodium chloride) is stored onsite within a permanent salt storage shed. Salt is a potential pollutant source because of possible spills during loading and unloading. The salt storage shed was designed and constructed with an underlying impervious liner embedded beneath the pavement. The storage pile is less than 30,000 tons of solid de-icing materials but remains in

place for more than 180 consecutive days. During winter weather events, a front-end loader is used to transfer material from the pile to hoppers on the plow trucks.

Deicing activities typically take place from October – March while the storage of solid deicing material occurs year-round.

4.1.3 MATERIALS STORAGE AREAS

Liquid deicing chemicals are stored in above ground tanks and consist of brine, calcium chloride, or magnesium chloride. Brine is made at the facility by mixing sodium chloride and water in the storage tank. Deicing activities typically take place from October – March while the storage of deicing material occurs year-round.

Magnesium (mag) chloride storage tanks have been standardized as 4,000-gallon capacity unless otherwise noted. Bulk deliveries of 4,000 gallons provided by the vendor are made to bulk storage tanks that are typically empty. When a bulk tank is not completely empty prior to a scheduled delivery, the mag chloride remaining in the tank is transferred to applicator trucks such that the bulk tank can receive the full delivery. The applicator trucks bring the excess mag chloride to another CTDOT facility that has capacity in its bulk storage tank (see truck transfers, below).

Applicator trucks are loaded with brine and deicing chemicals to pretreat roadways prior to wet, freezing conditions and winter weather events by pumping from the storage tanks to the containment vessels on the trucks. All magnesium (mag) chloride tanks and transfer hoses are fitted with dry disconnect fittings and double shut-off couplings; the plug and the socket both have a shut-off valve for minimal fluid loss when disconnecting the hose line. To transfer mag chloride from the bulk storage tank to the truck mounted tanks, maintenance personnel connect the transfer hose from truck tank to pump and ensure both fittings are securely sealed. A second hose is connected from the pump to the storage tank, and the operator ensures that both fittings are securely sealed. The operator powers on the transfer pump. While mag chloride is being added to the truck, the operator monitors the truck tank's fill level. When the truck tank level approaches the full mark, the operator turns off the pump, disconnects the hose from the storage tank to the pump, and disconnects the hose from the pump to the truck tank. All fittings on the truck tank, pump, and storage tank are verified to have been properly closed and secured. Mag chloride remaining in the hoses is returned to the bulk storage tank by shutting off the valve to the truck tank and activating the pump. Some mag chloride must remain in the pump to maintain its prime. Any additional residual mag chloride left in lines is collected in a small pail and manually poured into the applicator truck's tank or delivered to a CTDOT Repair facility at the end of winter season for coordinated disposal.

During winter season, after a snow/ice event any mag chloride on the trucks is left in the trucks' tanks and topped off each night/Friday afternoons or before a snow and ice event. Transfers of mag chloride from the truck mounted tanks back to the bulk storage tank occur at the end of snow/ice season or to make capacity for a full delivery. For these transfers, maintenance personnel connect the transfer hose from the pump to the storage tank and ensure both fittings are securely sealed. A second hose is connected from pump to truck tank and the operator

ensures that both fittings are securely sealed. The operator powers on the transfer pump. While mag chloride is being added to the bulk storage tank, the operator monitors the bulk storage tank fill level. When the truck tank level approaches the full mark, the operator turns off the pump, disconnects the hose from the truck to the pump, and disconnects the hose from the pump to the bulk storage tank. All fittings on the truck tank, pump, and storage tank are verified to have been properly closed and secured.

The tanks and associated piping, pump, and appurtenances are a potential pollutant source because of possible leaks and spills during tank filling and filling of applicator vehicles. Liquid deicing chemical storage tanks are potential pollutant sources as a result of possible spills occurring during tank filling and/or transfers to applicator trucks. Any above ground tanks or piping could be susceptible to leaks or releases from corrosion, impacts, or other damage.

Petroleum is stored in ASTs for the purpose of vehicle fueling and emergency generator operation. Petroleum tanks in general are potential pollutant sources as a result of possible spills occurring during tank filling and/or pumping of tank(s). Petroleum ASTs and any above ground piping could be susceptible to leaks or releases from corrosion, impacts, or other damage.

Diesel Exhaust Fluid (DEF) is stored in an AST and in original packaging located indoors and is used to lower the amount of pollutants emitted from diesel engines. DEF is a potential pollutant source as a result of possible spills occurring while the product is being added to the vehicle's DEF tank or when bulk deliveries are made to the AST.

Other potential sources of pollution stored outdoors include metal, sand, stone/crushed stone/stone dust, concrete/block, ADS pipe, traffic items/cones, lead paint debris drums, asphalt cold patch, asphalt millings, tree trunks/woodchips, and trailers/plows. Galvanized materials are stored outdoors and covered when feasible. Cold patch is stored outdoors under cover of a roof and/or a tarp. The pollutants associated with these items that could potentially affect stormwater discharges are oils, metals, particulates, and sediments.

Sand is stored in an uncovered pile. The size of the stockpile is small as sand is no longer used for road deicing but may be used as clean fill as part of highway maintenance activities. This is a potential pollutant source because of the possibility of excessive sediment entering the catch basins.

REPAIR Facilities' parts and materials, including 5-gallon containers and 55-gallon drums of automotive fluids and hydraulic oil, are stored in the Repair Facility's "Stores" warehouse and within the Cold Storage Building for onsite use or distribution to highway maintenance facilities. Batteries are stored inside the Repair Facility's stores warehouse on secondary containment pallets or secondary containment trenches for distribution to maintenance facilities.

MATERIALS STORAGE ("Stores") Facilities' activities are generally conducted inside and include storage of vehicle repair fluids, batteries, small vehicle parts, and traffic related equipment. Material and equipment are delivered to the outside of the facility and are transported inside by hand truck or forklift.

ELECTRICAL Facilities store equipment and materials used in field installations and repairs along the highway right of way. Materials storage includes aluminum poles, galvanized conduit, cable duct, wire, LED lighting components. Poles and conduit are stored outside. The cable duct is stored in plastic sheathing which protects it from precipitation. Wiring is stored inside Conex boxes in outdoor storage areas. LED lighting units are stored indoors.

BRIDGE Maintenance Facilities store equipment and materials used in field repairs. Material storage includes the following: (Outside): Trucks, dump trucks, bucket trucks, crash trucks, plow trucks, cold patch, metal, ADS pipe, stone, sand, concrete/block, lead paint chips in barrels. (Inside): Cement trucks, tractors, forklifts, boat, resin, bridge oil, and small quantity containers of various paints, release agents, tack coats, etc.

4.1.4 ONSITE WASTE STORAGE

Roll-off dumpsters are a potential pollutant source as a result of spillage during disposal and removal or if precipitation comes in contact with the dumpsters' contents. The dumpsters are used for the storage of onsite generated municipal solid waste or general refuse. The dumpster contents are removed routinely by a state-contracted recycling or disposal contractor.

Roll-off dumpsters are used for the storage of scrap metal and non-hazardous road debris/waste asphalt that gets collected from abandoned materials recovered from the highway roadside. Roll-off dumpsters are a potential pollutant source as a result of spillage during disposal and removal. All significant quantities of waste metal generated at the site are shipped to the district waste reduction facility. Road debris consists of unsorted waste collected from the roadside during maintenance activities.

During the course of routine operations, used vehicle batteries may be brought back to highway maintenance garages. These batteries are kept stored indoors and on secondary containment pallets or on containment trenches and later picked up and disposed of by the CTDOT battery vendor for recycling.

Used tires may be retrieved from state roads and brought back to a CTDOT maintenance facility. These tires are stored indoors or outside in containers. These used tires are routinely hauled away for disposal.

Used tires from fleet vehicles are stored indoors or outside in containers where they await pickup by CTDOT approved vendors to be recycled by the manufacturer or disposed of at approved facilities. Dumpster(s) are used for the storage of oily materials, including filters, rags, and pads, while awaiting collection by a disposal contractor. The oily debris dumpster(s) is/are covered while not in use. Spent batteries from fleet vehicles are stored inside the Repair Facility's stores warehouse on secondary containment pallets or secondary containment trenches while they await pick up by the CTDOT battery vendor for recycling.

Asphalt and asphaltic plug joints are stored in roll offs/dumpsters that are sealed/covered. RCRA-regulated painted steel debris recovered from field preparation of bridge beams are stored in drums for pickup by a licensed waste hauler.

4.1.5 ROOF AREAS

Roof areas, which could be subject to drippage, dust, or particulates from exhaust or vents, can be a potential pollutant source. The main facility building has three roof vents and the bridge building has two roof vents, both in the garages bays where the welding shops are located. Pollutants from these sources are metals and particulates typical of most large commercial buildings. The boiler stack does not impact stormwater.

4.1.6 ILLICIT PLUMBING CONNECTIONS (FLOOR DRAINS)

Both the Main Facility and the Bridges Buildings feature trench drains that serve the wash bay and the other interior equipment and vehicle storage areas of the garage building and general repair area.

Since the floor drains may receive discharges considered as vehicle maintenance wastewater, the discharge from the interior trench drains is registered under the General Permit for Discharges from Non-Significant Industrial Users (Non-SIU GP).

An evaluation of the floor drains and stormwater system was performed on July 7, 2025, by Andrew Berman, EIT of HRP Associates, Inc. The evaluation consisted of discussions with facility personnel, visual inspection of the facility, a review of site mapping including construction plans depicting the layout and connections for all underground utilities, and observations made during a site walkover. Based on the evaluation, there are no illicit plumbing connections between interior floor drains and the storm sewer system.

4.2 LIST OF POTENTIAL POLLUTANTS

Please refer to Volume I of this plan for a list of potential pollutants respective of each industrial pollutant source.

4.3 PAST SPILLS AND LEAKS

Please refer to Volume I of this plan for a list of past spills and leaks.

4.4 UNAUTHORIZED NON-STORMWATER DISCHARGES EVALUATION

The General Permit allows for the following non-stormwater wastewaters to be discharged to the storm sewer: discharges from emergency/unplanned fire-fighting activities; landscape irrigation or lawn watering; uncontaminated air conditioner condensate; uncontaminated air compressor condensate; uncontaminated groundwater; and water sprayed for dust control. All other non-stormwater wastewaters are not authorized to discharge to the storm sewer.

An evaluation of the stormwater system was performed on July 7, 2025 by Andrew Berman, EIT of HRP Associates, Inc. to identify non-stormwater discharges. The evaluation consisted of discussions with facility personnel, visual inspection of the facility, a review of site mapping including best available construction plans depicting the layout and connections for all underground utilities, and observations made during a site walkover.

Based on the evaluation, unauthorized non-stormwater discharges were not observed, and CTDOT personnel are not aware of any unauthorized non-stormwater discharges at the facility.

A certification for non-stormwater discharges is contained in Section 9.2.

i

5 STORMWATER CONTROL MEASURES AND PROCEDURES

This section describes non-structural and structural best management practices (BMPs) selected as control measures to minimize the discharge of pollutants from the permitted facility. Structural BMPs often consist of treatment controls or overhead coverage, while non- structural BMPs typically consist of good housekeeping practices and preventive maintenance activities and other low-cost practices.

5.1 NON-STRUCTURAL CONTROL MEASURES

In general, the facility's non-structural control measures consist of inspections and good housekeeping. Weekly inspections are conducted on the site's petroleum drums and above ground tanks, and monthly and semi-annual comprehensive inspections are completed on the site's potential pollutant sources and structural stormwater control measures. Refer to Volume I of this plan for information related to non-structural day-to-day good housekeeping measures and inspections used by CTDOT garage personnel to provide a clean and orderly work environment.

Additional non-structural control measures for specific pollutant sources are described below.

5.1.1.1 Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage

Non-structural stormwater control measures employed at this facility's **fueling area** include:

- Use of Speedi-Dry, absorbent pads, or other dry means of cleaning up spill and leaks.
- Maintaining a stocked spill kit at the fueling area.
- If wet methods are needed to clean outdoor paved surfaces to remove oil and grease, wash water will be properly contained, collected and disposed.
- Onsite personnel check the contents of spill kits and maintain proper supply of spill response equipment.

The type of CTDOT fleet includes vehicles based out of this facility including pickup trucks, SUVs, plow trucks, dump trucks, crash trucks, bucket trucks, tow trucks, wheel loaders, cement trucks, and brine applicators. CTDOT roadway maintenance equipment stored at the facility include mowers, sweepers, tractors, forklifts, and excavators.

This facility performs **vehicle maintenance** within both the Main Facility and Bridges Buildings'. Vehicles and equipment awaiting repair are stored inside when feasible, however due to space constraints and off-hours equipment malfunctions, vehicles and equipment may be stored outside temporarily. Truck bodies awaiting painting and vehicles awaiting shipping prior to resale or recycling may also be stored outside. Leaking equipment is stored inside as soon as possible. If fluid is released from equipment stored outside, the equipment is brought indoors and the release is cleaned immediately.

Non-structural stormwater control measures employed at this facility's **vehicle storage area** include:

- Onsite employees who have received proper stormwater training (as detailed in Volume I)

will regularly inspect equipment for spills or leaks and malfunctioning, worn, or corroded parts of equipment. Inspection reports will be reviewed annually by the Program Coordinator to determine if outdoor storage of leaking equipment is re-occurring, potentially necessitating enhanced preventative measures as well as corrective measures such as pavement cleaning.

- Based on observations made during inspections, garage personnel will coordinate the wet cleaning (pressure wash or steam clean) of any exterior pavement staining from vehicle leaks and ensure wash water is properly collected and disposed (sanitary sewer, wastewater holding tank, or otherwise containerized and recovered by a waste vendor).

Vehicle washing occurs within the both the Main Facility and Bridges Buildings' garage's interior wash bays. Non-structural stormwater control measures are used at this facility's vehicle wash bay. The facility contains a trench drain wash water collection system to prevent wash water from entering the stormwater drainage system. The trench drain must be maintained clear of sediment of debris to prevent wash water from over-flowing the trench covers and draining beyond the wash bay to the exterior.

5.1.1.2 Solid Deicing Material

The salt pile is enclosed within a rigid framed shed. Non-structural stormwater control measures include, positioning haybales at the shed entrance to contain any salt from spilling out beyond the covered roof during the times that salt is not actively being loaded into the salt shed or actively being loaded into applicator trucks. Upon the conclusion of winter weather event involving salt deployment, and after bulk shipments are received by the salt supplier, the areas in which loading or unloading occurred are swept of any loose rock salt.

5.1.1.3 Materials Handling Activities

Liquid Deicing Chemicals. Bulk storage tanks are inspected monthly for indications of leaks and malfunctioning, worn or corroded containment, valves, and hoses. Speedi-Dri or absorbent pads are used to collect any observed spills and leaks. Deliveries of liquid deicing chemicals (salt brine or magnesium chloride) and bulk petroleum products are witnessed by CTDOT personnel present for the entire duration of the delivery. Vehicles entering the facility are warned to be sure they will not endanger aboveground piping or other oil transfer operations. Appropriate facility personnel are present to monitor these activities to ensure that the product transfer is accomplished without a release and to confirm all fill ports are properly closed and locked.

Bulk Petroleum. Transfer operations during bulk delivery or removal of oil/petroleum product will be supervised by facility personnel and the truck driver at all times and will adhere to the following transfer procedures:

- Instruct the driver to check in with appropriate facility personnel.
- Extinguish any smoking materials.

- Check and verify level of product in the tank.
- Ensure adsorbent materials are available in the vicinity to respond to spills and catch basin spill blocker mat, as necessary.
- Chock wheels prior to pump-out.
- Place a drain pan or other appropriate containment device under the connections.
- Driver will remain present and attentive at all times during the entire transfer cycle.
- Inspect the vehicle before departure to be sure all loading lines have been disconnected and all drain and vent valves are closed.
- Immediately report any leakage or spillage, including quantity, to the facility Supervisor.

Containers. Handling of miscellaneous portable containers of oils and/or petroleum-based products may also result in product spillage. Drums stored onsite will be stored inside, in upright positions and, as appropriate, have hand pumps for dispensing of oil products. Care is taken to prevent accidental spillage or leakage when handling drums or miscellaneous oil containers. The facility is not equipped with a loading dock, as materials that are stored indoors are typically unloaded off the delivery truck while the truck is parked inside one of the garage bays.

5.1.1.4 Onsite Waste Management

Dumpsters must be kept closed and covered at all times when not in use (see Volume I's Good Housekeeping measures). The dumpsters must be maintained in good condition and must have water-tight with intact covers and drain plugs. Dumpsters must be leak-proof and covered.

In the event that the disposal contractor does not provide the facility with a dumpster that is leak proof or equipped with a solid cover, facility personnel must immediately contact the disposal contractor for a replacement dumpster that meets CTDOT's specifications.

Covered, lined dumpsters are provided for the storage of empty motor oil containers and/or used automotive oil filters and/or spent Speedi-dry (or equivalent absorbents) for pick-up by approved disposal facilities.

Used tires are either stored indoors or in covered piles outside. Outside piles are accessible to emergency and fire vehicles. Tires are routinely hauled offsite for disposal.

Waste generated during vehicle and equipment maintenance activities is stored indoors and is removed from the site by a licensed waste hauler.

5.2 STRUCTURAL CONTROL MEASURES

In general, the structural stormwater control measures employed at the site include a stormwater drainage system. The drainage system's catch basin sumps are intended to provide stormwater treatment through settling of solids present in the discharge. The catch basins' sumps are

inspected by garage personnel during the semi-annual comprehensive site evaluation. If a catchbasin is more than 50% full of solids, then a clean out is performed using the Maintenance District's vactor truck to maintain proper operation and sediment removal efficiencies.

Gross particle separators provide stormwater treatment through the settling of solids and removal of floating debris present in the discharge prior to reaching a surface water or MS4. The gross particle separators are inspected by garage personnel during the semi-annual comprehensive site evaluation. If the chamber is more than 50% full of solids, then a clean out is coordinated with an environmental services contractor to maintain proper operations and sediment removal efficiencies.

Detention basins provide treatment of stormwater runoff by temporarily holding stormwater, which reduces the rate at which the runoff enters waterways or receiving MS4. This allows pollutants in the stormwater to settle before being released through the basin's outlet. Generally, the inlets to the basins are preceded by a gross particle separator to reduce the sediment loading to the basin itself. Detention basins are inspected at least annually by CTDOT Environmental Compliance office.

If the detention basin is more than 50% of solids or require other maintenance to remain effective (i.e., removal of excessive vegetation), then a clean out is coordinated by CTDOT Environmental Compliance office with an environmental services contractor to maintain proper operations and sediment removal efficiencies.

Additional structural control measures for specific pollutant sources are described below.

5.2.1.1 Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage

Vehicle fueling occurs at the fuel island. Structural control measures the impervious concrete pad that surrounds the dispensers. Fuel can only be dispensed by inserting a pro key into the pump. Fuel dispensers are equipped with automatic fueling shut-off nozzles to prevent spillage from overfilling. A spill kit is located on the north side of the fuel island.

This facility performs **vehicle maintenance** within both the Main Facility and Bridges Buildings'. Activities conducted inside vehicle bays include welding, hydraulic and mechanical repair, tire changes, painting, oil changes, lawnmower repair, metal fabrication, and needle-scaling. Floor washing is not permitted inside the bays. Repair operations are conducted within covered garage bays equipped with a trench drain collection system that drain to sanitary sewer via pretreatment through an oil-water separator.

Vehicles and equipment washing occurs within the dedicated wash bays. The facility contains a trench drain wash water collection system to prevent wash water discharges from entering the stormwater drainage system. The trench drains from the wash bay are connected to sanitary sewer via pretreatment through an oil-water separator.

Vehicles and equipment storage that occurs indoors is within garage bays equipped with a trench collection system. The trench drains are connected to sanitary sewer via pretreatment through an oil-water separator.

5.2.1.2 Solid Deicing Material

The salt pile is enclosed within a rigid framed structure that prevents the migration or release of material outside of the structure through its sidewalls. During the times that salt is not actively being loaded into the salt shed or actively being loaded into applicator trucks, haybales are positioned at the shed entrance to contain any salt from spilling out beyond the covered roof.

5.2.1.3 Material Handling Activities

Liquid Deicing Materials. Bulk storage containers containing liquid de-icing materials have impermeable secondary containment which will hold at least 110% of the volume of the container without overflowing from the containment area. Jersey barriers surround the bulk storage container to prevent collisions from vehicles or equipment.

Bulk Petroleum Storage. Bulk storage tanks containing petroleum have impermeable secondary containment which will hold at least 110% of the volume of the tank without overflowing from the containment area.

Electronic tank monitoring systems (TMS) are used to monitor the status of all site bulk petroleum ASTs. The TMS includes a central monitoring console located in or near the office area, which is connected to and communicates with a probe or probe(s) at each tank. Tank probes include a tank level probe and possibly a tank interstitial space probe and a piping containment sump pump. In addition, system alarms will sound if the system detects a tank overflow or leak.

5.2.1.4 Onsite Waste Management

Dumpsters must be closed and covered at all times when not in use (see Volume I's Good Housekeeping measures). The dumpsters must be maintained in good condition and are water-tight with intact covers and drain plugs. Dumpsters are leak-proof and covered. Covered lined dumpsters are provided for the storage of empty motor oil containers and/or used automotive oil filters and/or spent Speedi-dry (or equivalent absorbents) for pick-up by approved disposal facilities.

5.3 STORMWATER CONTROL MEASURE SCHEDULES & PROCEDURES

5.3.1 GOOD HOUSEKEEPING

Refer to Volume I of this plan for information related to day-to-day good housekeeping measures used by CTDOT garage personnel to provide a clean and orderly work environment. Good housekeeping will contribute to a reduction in potential stormwater pollution from activities at the

site and the possibility of an accidental spill. For practices employed at this facility, please see Volume I of this Plan.

5.3.2 SPILL PREVENTION AND RESPONSE PROCEDURES

Refer to Volume I of this plan for information related to spill prevention and response procedures. Part III of this plan also contains a separate Spill Prevention, Control, and Countermeasure (SPCC) Plan.

5.3.3 SEDIMENT AND EROSION CONTROLS

The developed areas of the site are mainly impervious with much of the area covered by pavement and the facility buildings; therefore, there is little potential for soil erosion into the stormwater system. Areas of this site that are not covered by impervious surface have adequate vegetative cover, such as grass or shrubs, or are landscaped with stone to prevent soil from being washed away by runoff. Facility improvement projects that cause impervious or vegetated areas to be disturbed will include specifications for temporary erosion and sediment control measures that are consistent with CT DEEP's *Connecticut Guidelines for Soil Erosion and Sediment Control*.

Sand is swept from paved surfaces as necessary. The onsite catch basins and gross particle separator capture most of the un-swept sediment load generated at the site during storm events. Sediment and erosion control as it pertains to future construction is discussed further in Section 8.

5.3.4 MAINTENANCE

Preventative maintenance at the facility involves weekly inspections of petroleum drums and above ground tanks, and monthly and semi-annual comprehensive inspections of the site's potential pollutant sources and structural stormwater control measures.

Preventative maintenance tasks are performed as necessary by onsite employees who have received proper stormwater training. See Volume I for full training details.

In the event a catch basin, gross particle separator, or detention basin is scheduled to be off-line (i.e., a planned maintenance activity to dredge the detention basin, or a major facility renovation involving the replacement of drainage structures), industrial activities will be relocated from the respective DA and/or temporary water handling back-up practices shall be specified in accordance with the CT DEEP's *Connecticut Stormwater Quality Manual* and CTDOT's *Drainage Manual*.

5.3.5 EMPLOYEE TRAINING

Refer to Volume I of this plan for information relating to employee training.

5.4 INACTIVE OR UNSTAFFED SITES

In the event that the site must prepare for seasonal closures, planned shutdowns, furloughs and other circumstances under which the site becomes inactive, vehicles and equipment will either be stored inside the facilities garage bays or relocated to another garage facility that will remain active.

5.5 RESILIENCY MEASURES

During Site rehabilitation/reconstruction or new site selection and design:

- Reinforce materials storage structures within flood prone areas to withstand flooding and additional exertion of force from stormwater surges.
- Prevent floating of semi-stationary structures by elevating to the Base Flood Elevation (BFE) level or securing with a non-corrosive device.
- Evaluate the site at the time of rehabilitation/reconstruction to determine if stormwater system modifications or site relocation/reconfiguring are required to mitigate impacts from flood prone areas (i.e. using higher elevations of the site for permanent storage areas). If no such areas exist, evaluate long-term effectiveness of operations at site.

During Site Operations/Storm Preparation

- Delay deliveries or storage of non-essential materials in anticipation of a major storm event (i.e., within 72 hours.)
- Prepare emergency procedures in the event of storage or material delivery during major storm events.
 - Temporarily store materials and waste above the BFE level or areas prone to ponding.
 - Temporarily reduce or eliminate outdoor storage of non-essential materials.
 - Temporarily relocate any mobile vehicles and equipment to higher ground.
- Develop scenario-based emergency procedures for major storms, conduct staff training and identify emergency contacts for staff and contractors.

Note: CTDOT is required to perform work to reopen roads following storms. As such, materials are stored at the CTDOT facilities to perform this work and may actually be mobilized to facilities in preparation for storm response. Materials related to CTDOT's mandated storm response work shall be evaluated as a part of storm preparation but will not necessarily be relocated due to the need to have such materials immediately available in storm impacted areas.

7 MONITORING PROGRAM AND PROCEDURES

7.1 POINT SOURCE DISCHARGE INFORMATION

DA 001, DA 002, and DA 003 discharge to point source outfalls/monitoring locations designated as Outfall 001, Outfall 002, and Outfall 003.

Outfall 001 consists of a fifteen-inch reinforced concrete pipe outlet that discharges to a wooded area west of the bridge maintenance building, where it eventually reaches the Indian River. DA 001 includes the following potential pollutant sources: two permanent structures: the bridges maintenance garage and a salt shed, the repair and maintenance storage yard and associated cones, cold patch, steel, block, plow, and stone dust storage, the electrical storage yard and associated metal storage, lead paint debris drums, asphalt hot box, scrap metal bins, brine tank, bridges parts yard and associated scrap metal/aluminum, water tanks, ADS pipe, general refuse dumpster, scrap aluminum dumpster, scrap steel roll-off, asphalt dumpster, and additional material storage such as cold patch, stone, riprap, sand, concrete debris, asphalt/millings, tree trunks/woodchips, and general refuse debris.

DA 002 consists of two sub-DAs that discharge at the same location. Outfall 002 monitoring location consists of a manhole northeast of the main facility building. Beyond the monitoring location, the combined runoff eventually discharges via an 18" reinforced concrete pipe outlet to the Indian River. DA 002 includes the following potential pollutant sources: Main facility building, salt shed, cold storage building; truck mounted salt brine tank, plows/trailers, stone, and used oil waste dumpsters.

DA 003 consists of three sub-DAs that discharge at the same location. DA 003A captures runoff from the paved area to the south of the main facility building and the southern portion of the maintenance bay roof, discharging to DA 003B. DA 003B is conveyed to Drainage area 003C. DA 003C discharges to the central portion of the site, where it will eventually discharge into the Indian River. DAs 003B and 003C are not monitored because they contain no industrial activity, and/or feature stormwater input from adjacent properties, and/or do not feature a point source discharge. Outfall 003 monitoring location consists of a twelve-inch PVC pipe outlet within the catch basin located south of the Main Facility Building, prior to offsite discharge being combined to the system. DA 003A includes the following potential pollutant sources: one permanent structure, the maintenance section of the main facility building, the area also includes the fuel island and associated gasoline, diesel, and DEF ASTs, the magnesium chloride and salt brine ASTs, the main facility building generator and associated diesel belly tank, the main facility building electrical transformer, and vehicle parking/traffic.

DA 004 drains as sheet flow run-off towards the west of the site and has no point source discharge. As such, no monitoring is conducted for the discharge from DA 004. DA 004 includes the following potential pollutant sources: vehicle parking/storage and waste oil and waste antifreeze ASTs.

The site does discharge within 500 feet of a tidal wetland. The facility shall not initiate, create, or originate a discharge without infiltrating the Water Quality Volume for the industrial DA.

7.2 QUARTERLY STORMWATER VISUAL ASSESSMENTS

Stormwater will be visually inspected and/or analyzed for the parameters indicated in Volume I of this Plan for the respective sampling period.

Visual monitoring of each stormwater outfall must be conducted on a quarterly basis. Quarters begin on January 1, April 1, July 1, and October 1. Once each quarter a stormwater sample must be collected from each outfall and a visual assessment of these samples are conducted. Sampling will be conducted by the General Supervisor or designee.

Samples must be collected from discharges resulting from a storm event that occurs at least 72 hours after any previous storm event generating a stormwater discharge. Samples must be collected within 30 minutes of the commencement of the discharge. If the sample contains snow or ice melt, that information will be included on the Visual Monitoring Report Form.

If the visual assessment of these indicators demonstrates the control measures for this facility are inadequate or are not being properly operated and maintained, CTDOT must review and revise the selection, design, installation, and implementation of the control measures to ensure that the condition is eliminated and will not be repeated in the future. CTDOT will record visual observations on the worksheet provided on the following pages. Copies of the completed Visual Inspection Reports must be retained in the Plan for at least five years. Please see Volume I of this Plan for further information on visual analysis and monitoring requirements.

7.3 MONITORING PARAMETERS AND FREQUENCY

This repair facility is required to perform semiannual monitoring for the benchmark parameters and annual monitoring for chloride and cyanide (for which there are no benchmark thresholds. A sample for aquatic toxicity must also be taken annually during the first and second year of the permit term. The monitoring requirements for a permit parameter have been fulfilled for the permit term if after the collection of four semiannual samples the average of the four monitoring values does not exceed the benchmark. No further monitoring of that parameter would be required for the duration of the permit. CTDOT repair facilities are required to continue to conduct visual monitoring.

For any benchmark parameter that is initially detected above the benchmark threshold, or detected in a second benchmark exceedance, the Pollution Prevention Team (PPT) will review the site for the possible pollutant sources and for the state of any structural control measures within the outfall's catchment area. The PPT must implement any corrective or additional measures, like improved good housekeeping, which would reasonably be expected to reduce the detected pollutant(s) below the respective benchmark threshold(s).

If a benchmark parameter is exceeded for a third time, the PPT must review and identify and install appropriate structural source controls (e.g., permanent controls such as permanent cover, berms,

and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds) that would reasonably be expected to reduce the detected pollutant(s) below the respective benchmark threshold(s).

Monitoring Requirements Table			
MONITORING TYPE	SCHEDULE	PARAMETER	THRESHOLD
BENCHMARK	Semiannually until requirements for benchmark monitoring exemption are met ¹	Chemical Oxygen Demand (COD)	75 mg/L
		Total Oil and Grease (O&G)	5.0 mg/L
		pH	5.0 - 9.0 s.u.
		Total Suspended Solids (TSS)	90 mg/L
		Total Phosphorus (TP)	0.40 mg/L
		Total Kjeldahl Nitrogen (TKN)	2.30 mg/L
		Nitrate as Nitrogen (NO ₃ -N)	1.10 mg/L
		Total Copper (Cu)	0.059 mg/L
		Total Lead (Pb)	0.076 mg/L
		Total Zinc (Zn)	0.160 mg/L
OUTFALLS WITH SALT STORAGE WITHIN DA	Annually	Chloride	None
		Cyanide	None
AQUATIC TOXICITY	Annually in the 1 st and 2 nd year of permit term	Mysid shrimp (Mysidopsis bahia)	None
IMPAIRED WATERS	Annually	SEE SECTION 7.4.1	
¹ Facilities may qualify for benchmark exemptions for a maximum of 2 years at a time			

7.4 MONITORING PROGRAM DETAILS

7.4.1 Impaired Waters Monitoring

All DAs ultimately discharge to the Indian River (Assessment Unit ID: CT CT-C1_018-SB). This section of the Indian River has been assessed to be an impaired waterway. No pollutant has been identified as a cause of the impairment.

If CTDOT is notified that the receiving waterbody is assessed in the future and CT DEEP identifies new or additional impairments, any additional monitoring requirements will be implemented accordingly.

7.4.2 Total Maximum Daily Load

TMDL refers to pollutant discharge limits/concentrations based upon the maximum amount of a pollutant a waterbody can receive without adverse impact to fish, wildlife, recreation, and other uses. TMDLs are established for waterbodies that have been designated as impaired. Per the General Permit, facilities that discharge stormwater to impaired waterbodies may be subject to additional monitoring requirements.

There is no TMDL established for the receiving water downstream of the facility. If CTDOT is notified that the receiving waterbody has been assessed in the future and CT DEEP established a TMDL, any additional monitoring requirements will be implemented accordingly.

7.5 MONITORING EXCEPTIONS FOR UNSTAFFED FACILITIES

In the event that the site must prepare for seasonal closures, planned shutdowns, furloughs and other circumstances under which the site becomes inactive, CTDOT may invoke the exception for inactive and unstaffed facilities for benchmark monitoring or impaired waters monitoring by amending this SWPPP a certification statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to stormwater. CTDOT must also submit for CT DEEP's approval a revised registration, changing the status of the facility to inactive and unstaffed. If circumstances change and industrial materials or activities become exposed to stormwater or the facility becomes active and/or staffed, CTDOT must immediately resume the requirements of contained within the general permit.

7.6 MONITORING PROGRAM DOCUMENTATION

The Program Coordinator will report monitoring data using either by PDF or Net-DMR, EPA's electronic discharge monitoring report (DMR) tool, according to the schedule in Section 7(g) Table 11. In the event that monitoring results are unable to be electronically reported in Net-DMR, the monitoring results and records will be kept within this SWPPP.

7.7 CORRECTIVE ACTIONS

A list of corrective actions, reports, and any supporting documentation has been created to document and track stormwater management recommendations noted during site inspections or because of monitoring exceedances. These documents can be found in Appendix E and include recommended measures to reduce pollutants in stormwater runoff from the site. Corrective actions will be reviewed and updated as necessary.

8 FUTURE CONSTRUCTION

New construction involving the addition or replacement of drainage features in industrial areas that discharge to a water of the state or MS4 will be designed and constructed with the intent to achieving at least 80 percent removal of total suspended solids from the stormwater discharge.

As per Section 4.3.2.11 of the General Permit, any activity that disturbs greater than one acre shall be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. All construction regardless of size, shall comply with the most recent Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2023, as amended, Connecticut Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures.

Wherever possible, the use of copper or galvanized roofing or building materials for any new construction where these materials will be exposed to stormwater shall be avoided.

9 SIGNATORY REQUIREMENTS

9.1 SWPPP CERTIFICATION & PLAN REVIEW SIGNATURES

MANAGEMENT SIGNATURE

If significant changes are made to the site or to the Stormwater Pollution Prevention Plan (SWPPP) in accordance with Section 4.3.1 and the SWPPP must be re-certified in accordance with Section 5.21 of the permit.

Signature: _____

Date: 3/26/2026

Name: Jason Coite, PE

Title: Transportation Principal Engineer

Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan (SWPPP) prepared for the site or facility known as Milford Maintenance & Repair & Bridge Garages. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the SWPPP meets the criteria set forth in the *General Permit for the Discharge of Stormwater Associated with Industrial Activity*.

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 the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the Regulations of Connecticut State Agencies, pursuant to Section 53a-157b of the Regulations of Connecticut State Agencies, and in accordance with any other applicable statute.

Signature: 

Date: 3/25/2026

Name: Thomas Battles, PE

Title: Engineering Practice Leader

HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032

Registration Number: PEN0015472



9.2 NON-STORMWATER DISCHARGES CERTIFICATION

I certify that in my professional judgment, the stormwater discharge from the site or facility known as Milford Maintenance & Repair & Bridge Garages consists only of stormwater, or of stormwater combined with wastewater authorized by an effective permit issued under Section 22a-430 or Section 22a-430b of the Regulations of Connecticut State Agencies, including the provisions of Section 4.3.2.9b the *General Permit for the Discharge of Stormwater Associated with Industrial Activity* or of stormwater combined with any of the following discharges provided they do not contribute to a violation of water quality standards.

This certification is based on testing and/or evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the onsite drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to sanitary sewer.

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 the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the Regulations of Connecticut State Agencies, pursuant to Section 53a-157b of the Regulations of Connecticut State Agencies, and in accordance with any other applicable statute.

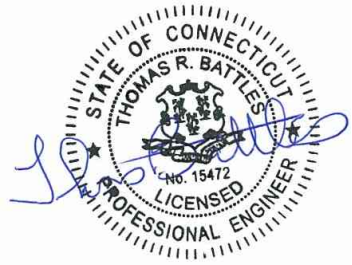
Signature: Thomas Battles

Date: 3/25/2026

Name: Thomas Battles, PE

Title: Engineering Practice Leader
HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032

Registration Number: PEN0015472



PART 3

**SPILL PREVENTION, CONTROL, AND
COUNTERMEASURE PLAN**

10 SPCC - INTRODUCTION AND PURPOSE

The EPA's Oil Pollution Prevention Rule became effective January 10, 1974. It was published under the authority of Section 31.1(j)(1)(c) of the Federal Water Pollution Control Act (CWA). The regulation is found in 40 CFR 112. The latest revision to the rule was effective August 16, 2022.

Facilities subject to 40 CFR 112 must prepare and implement a SPCC Plan. The objective of the SPCC plan is to establish standard procedures, methods, and equipment or other requirements for equipment to prevent the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

This SPCC Plan has been prepared in accordance with good engineering practices and conforms to 40 CFR Part 112, the Federal Oil Pollution Prevention Regulation. A complete copy of this Plan is maintained onsite and is available for onsite review.

11 MATERIAL HANDLING AND STORAGE

Section 11.1 on the following pages describe oil product storage (both outdoors and indoors) at the facility, including oil products stored in the following:

- ASTs
- Oil-filled electrical equipment (e.g., transformers)
- Spill tanks
- Container storage (55 gallons or greater)
- Trucks that hold oil product and are parked at the facility.

Oil is defined by 40 CFR 112 and the CWA to include:

- Petroleum
- Petroleum products
- Fuel oil
- Sludge
- Used oil
- Vegetable oil
- Animal oils

All bulk storage containers are constructed of materials that are chemically and physically (pressure and temperature) compatible with oil stored.

All secondary containments (primarily spill pallets) exist for the entire capacity of the largest single container. All ASTs are double walled.

Onsite spill response equipment is present at the site. Spill kits at the site include:

- Absorbent materials
- Speedi-dry
- Personal protective equipment (gloves, etc.)
- Booms.

11.1 INVENTORY OF OIL PRODUCT STORAGE

Total storage capacity for SPCC regulated oil products onsite is approximately 20,595 gallons, including ASTs and drums. The total number of drums may fluctuate.

Note: onsite oil-containing electrical transformers are owned by United Illuminating and not subject to CTDOT's SPCC plan (if a spill occurs, United Illuminating will be notified and will be responsible for clean-up).

11.1.1 ABOVEGROUND PETROLEUM STORAGE TANKS

Content	Capacity (gals.)	Age/Life Expectancy of AST	Tank Material	Secondary Containment Measures	Liquid Level Indicator	Location (indoor/outdoor–building)
Diesel	8,000	Installed 2015, 30-year life expectancy	Steel (Concrete Convault)	HDPE membrane btw. primary tank and concrete encasement	Visual Float	Outdoors, fuel island, south of main facility building
Gasoline	8,000	Installed 2015, 30-year life expectancy	Steel (Concrete Convault)	HDPE membrane btw. primary tank and concrete encasement	Visual Float	Outdoors, fuel island, south of main facility building
Waste Oil	500	Installed 2015, 30-year life expectancy	Steel	Double walled tank	Visual Float	Outdoors, north of main facility building
Motor Oil	330	Installed 2015, 30-year life expectancy	Steel	Double walled tank	Visual Float	Inside, Lube Room
Hydraulic Oil	330	Installed 2015, 30-year life expectancy	Steel	Double walled tank	Visual Float	Inside, Lube Room

11.1.2 PETROLEUM CONTAINER STORAGE (55 GALLONS OR GREATER)

Content	Capacity (gals)	Maximum Number of Containers	Stored on Containment Pallets or off the ground (Yes/No)	Location (indoors/outdoors – building)
Motor Oil	55	22	Yes	Indoors, (3) In lube room in main facility building, (7) in stores stock room in main facility building, (11) in cold storage building, and (1) in weld shop in main facility building
Hydraulic Oil	55	11	Yes	Indoors, (3) In lube room in main facility building, (3) in stores stock room in main facility building, (4) in cold storage building, (1) in weld shop in main facility building
Biohydraulic Oil	55	1	Yes	Indoors, In lube room in main facility building

SECTION 11

MATERIAL HANDLING AND STORAGE

Content	Capacity (gals)	Maximum Number of Containers	Stored on Containment Pallets or off the ground (Yes/No)	Location (indoors/outdoors – building)
Bridge Oil	55	4	Yes	Indoors, In garage bays of bridge building
Fluid Film	55	1	Yes	Indoors, In lube room in main facility building
Transmission Fluid	55	1	Yes	Indoors, In lube room in main facility building
Resin	55	3	Yes	Indoors, In wash bay of bridge building

11.1.3 BURIED OIL/WATER SEPARATORS/HOLDING TANKS/USTs

Content	Capacity (gals.)	Secondary Containment Provided (Yes/No)	Material	Location (indoors/outdoors – building)
Vehicle Maintenance Wastewater OWS	1,000	Yes	Fiberglass	Outdoors, west of main facility building
Vehicle Maintenance Wastewater OWS	1,000	Yes	Fiberglass	Outdoors, northeast of bridge building

*Oil/water separators and petroleum USTs are not regulated under SPCC rules for storage tanks

11.1.4 OIL-FILLED ELECTRICAL EQUIPMENT

11.1.4.1 TRANSFORMERS

ID Number	Utility Co.	Capacity	Secondary Containment Provided (Yes/No)	Location
2330	United Illuminating	Approximately 202 gallons	Within enclosure on concrete pad in grass	Outdoors, southeast of main facility building
2296	United Illuminating	Approximately 125 gallons	Within enclosure on concrete pad in grass	Outdoors, north of bridge building

SECTION 11**MATERIAL HANDLING AND STORAGE**

Note: Transformers are owned by United Illuminating, if a spill occurs CTDOT will contact United Illuminating who will be responsible for any clean-up.

11.1.4.2 EMERGENCY GENERATORS

Capacity of Oil Tank (gallons)	Content	Secondary Containment Provided (Yes/No)	Liquid Level Indicator	Location
725 (belly tank)	Diesel	Yes	Visual Float	Outdoors, southeast of main facility building
345 (day tank)	Diesel	Yes	Visual Float	Outdoors, north of bridge building

12 POTENTIAL SPILL PREDICTIONS AND DISCHARGE PATTERNS

As required by 40 CFR 112.7(b), Section 12.1 on the following page is a table describing potential spill rates, total quantity of oil which could be discharged, and direction of discharge flow should equipment failures occur at the locations identified in Section 11.1. Types of failures that were evaluated for each location, where applicable, included the following:

- Tank overflow
- Tank rupture or leakage
- Pipe failure
- Wastewater treatment facility failure
- Spills during transfer operations at loading docks, racks or tank truck parking areas (valve failures, etc.)

The predicted rate of flow was calculated by evaluating the size and location of each failure and the equipment involved. The maximum spill volume was based on the total quantity of oil that has a reasonable potential to discharge from the facility from an equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge) if the situation were to occur. This prediction takes into account the time required to respond to a spill. The predicted flow direction of a spill was determined by evaluating drainage patterns, location of storm and/or sewer drains, and secondary containment equipment and/or structures.

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Diesel Fuel 8,000-gallon Steel AST	Outside, approx. 95-feet southeast of maintenance section of main facility building	Tank overflow during filling	Overflow Whistle Fill port spill basin	500 gpm	1,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Tank rupture or leakage	Double walled tank Interstitial monitoring	Instantaneous	8,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Pipe failure	Double walled piping	5 gpm	10	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Truck failure during transfer	Active	Instantaneous	8,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Spill during vehicle fueling	Active	See "Dispensing Area"		

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Gasoline 8,000-gallon Steel AST	Outside, approx. 95-feet southeast of maintenance section of main facility building	Tank overflow during filling	Overflow Whistle Fill port spill basin	500 gpm	1,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Tank rupture or leakage	Double walled tank Interstitial monitoring	Instantaneous	8,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Pipe failure	Double walled piping	5 gpm	10	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Truck failure during transfer	Active	Instantaneous	8,000	To catch basin approx. 74-ft southeast from fuel island/Outfall 003
		Spill during vehicle fueling	Active	See "Dispensing Area"		

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Hydraulic Oil 330-gal Steel AST	Inside, in western portion of main facility building, in the Lube Room	Tank overflow during filling	<ul style="list-style-type: none"> • Active Measures • Building's walls and floor • Collection trench drains and associated OWS 	500 gpm	1,000	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained.
		Tank rupture or leakage	<ul style="list-style-type: none"> • Building's walls and floor • Collection trench drains and associated OWS 	Instantaneous	330	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained.
		Dispensing Hose failure:	<ul style="list-style-type: none"> • Active Measures • Building's walls and floor • Collection trench drains and associated OWS 	5 gpm	10	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained
		Delivery truck failure during transfer	Active Measures	Instantaneous	330	Overland flow to wooded area approx. 41- ft west of main facility building

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Motor Oil 330-gal steel AST	Inside, in western portion of main facility building, in the Lube Room	Tank overflow during filling	<ul style="list-style-type: none"> • Active Measures • Building's walls and floor • Collection trench drains and associated OWS 	500 gpm	1,000	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained.
		Tank rupture or leakage	<ul style="list-style-type: none"> • Building's walls and floor • Collection trench drains and associated OWS 	Instantaneous	330	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained.
		Dispensing Hose failure:	<ul style="list-style-type: none"> • Active Measures • Building's walls and floor • Collection trench drains and associated OWS 	5 gpm	10	Flow towards trench drain in center of garage bays, and then to OWS, where it is contained.
		Delivery truck failure during transfer	Active Measures	Instantaneous	330	Overland flow to wooded area approx. 41-ft west of main facility building

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Waste Oil 500-gal Steel AST	Outside, northwest of main facility building	Tank overflow	Active Measures Fill port spill basin	500 gpm	1,000	Overland flow to wooded area approx. 32-ft west of main facility building
		Tank rupture or leakage	Double-walled tank	Instantaneous	500	Overland flow to wooded area approx. 32-ft west of main facility building
		Dispensing Hose failure:	Active Measures	5 gpm	10	Overland flow to wooded area approx. 32-ft west of main facility building
		Delivery truck failure during transfer	Active Measures	Instantaneous	500	Overland flow to wooded area approx. 32-ft west of main facility building

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Generator with ~725-gal belly tank, Steel AST	Outdoors, Approx. 65 feet southeast from Main Facility Building	Tank overflow during filling	Active Measures Fill port spill basin	500 gpm	1,000	Sheet flow west/Outfall 003
		Tank rupture or leakage	Double-walled	Instantaneous	725	Sheet flow west/Outfall 003
		Pipe failure: Exterior Piping	Double walled piping	5 gpm	10	Sheet flow west/Outfall 003
		Pipe failure: Interior Piping	Double walled piping	5 gpm	10	Sheet flow west/Outfall 003
		Truck failure during transfer	Active Measures	Instantaneous	1,200	Sheet flow west/Outfall 003

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Generator with ~345-gal day tank, Steel AST	Outdoors, Approx. 15 feet east from Bridges Building	Tank overflow during filling	Active Measures Fill port spill basin	500 gpm	1,000	Infiltration east of Bridges Building
		Tank rupture or leakage	Double-walled	Instantaneous	345	Infiltration east of Bridges Building
		Pipe failure: Exterior Piping	Double walled piping	5 gpm	10	Infiltration east of Bridges Building
		Pipe failure: Interior Piping	Double walled piping	5 gpm	10	Infiltration east of Bridges Building
		Truck failure during transfer	Active Measures	Instantaneous	1,200	Infiltration east of Bridges Building

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Motor Oil 55-gal drums	Indoors: (3) In lube room in main facility building, (7) in stores stock room in main facility building, (11) in cold storage building, and (1) in weld shop in main facility building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.
Hydraulic Oil 55-gal drums	Indoors: (3) In lube room in main facility building, (3) in stores stock room in main facility building, (4) in cold storage building, (1) in weld shop in main facility building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.
Biohydraulic Oil 55-gal drum	Indoors: In lube room in main facility building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.
Bridge Oil 55-gal drum	Indoors: garage bays of bridge building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.

Potential Oil-Spill Predictions and Discharge Patterns

Tank/Container Contents Capacity Construction Mat. Above/Underground	Location of Tank/ Container Storage	Type of Potential Failure	Containment Controls	Potential Release Rate (units as noted)	Potential Release Volume (gallons)	Potential Release Direction/ Outfall ###
Fluid Film 55-gal drum	Indoors: In lube room in main facility building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.
Transmission Fluid 55- gal drum	Indoors: In lube room in main facility building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.
Resin 55-gal drums	Indoors: In wash bay in Bridges Building	Container failure/rupture	Spill Pallet, Containment Trench, Building, Active Measures, OWS	55/drum	Up to 55 gallons/drum	Release will be contained within spill pallet/containment trench. If failure occurs the release will flow to floor drain and then to OWS, where it will be contained.

13 PREVENTION MEASURES

This section describes non-structural and structural prevention measures for control of oil pollution at the facility. Structural PMs often consist of treatment controls or overhead coverage, while non-structural PMs typically consist of good housekeeping practices, preventive maintenance activities, and inspections.

In general, spill prevention measures are primarily directed at maintaining and assuring the integrity of the tank walls, secondary containment systems, and preventing overfills.

- Tanks and containers used for petroleum storage are constructed of materials compatible with petroleum.
- Gasoline and diesel pumps are only accessible utilizing either a key card or code to start the dispensing pump.
- There is currently no underground piping located at the facility. Any piping that may be installed in the future will have protective wrapping/coating and cathodic protection or otherwise satisfy the corrosion protection provision for piping in 40 CFR Part 280. Any such piping will conform to leak monitoring requirements and will be integrity and leak tested at the time of installation, modification, construction, relocation, or replacement.
- Aboveground piping is integral to the generators. This pipe is minimal in nature and is protected with anti-siphon valving at the tank to prevent siphoning in the unlikely event of above ground piping failure. Active control measures would be used to mitigate the release.
- Aboveground piping is located in a concrete trench from the hydraulic reservoirs to the hydraulic lift assemblies in the repair building. Any release would be controlled by active measures. If the release continued it would flow to trench drains and then to the OWS where it is contained.
- Aboveground piping exists from the motor oil and hydraulic oil ASTs and is operated by a hand-controlled trigger. If a release occurred, the operation would be terminated, and active measures implemented to clean and control the release. Beyond active measures, a release would flow to the trench drain and then to the OWS where it is contained.
- Aboveground piping exists from the used oil AST to the transfer tank in the repair building. The operator will first ensure the piping is intact, then operate the oil pump transfer, once transfer is complete the operator will confirm no spillage.
- All piping and associated appurtenances (i.e., valves, flanges) are subject to regular inspections for leaks and deterioration. Valves are kept in the closed position when not

in use. All pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

SPILL PREVENTION MEASURES		
	NON-STRUCTURAL	STRUCTURAL
ABOVEGROUND STORAGE TANKS	<p>The environmental equivalent of integrity testing is achieved with the following:</p> <ul style="list-style-type: none"> • The ASTs life expectancies are not exceeded. • The ASTs are off the ground or have an impermeable barrier between the tank and the ground. • The ASTs are inspected on a weekly and monthly basis. <p>AST systems shall not be moved, modified, or abandoned in place. If any of these actions are necessary, facility personnel shall contact the Program Coordinator to make Plan amendments.</p> <p>CTDOT personnel are present to witness product deliveries or waste removals at all times.</p> <p>Vehicles entering the facility are warned to be sure they will not endanger aboveground piping or other oil transfer operations.</p> <p>Appropriate facility personnel will monitor activities to ensure that the product transfer is accomplished without a release and confirm all caps, and manhole covers are properly returned, etc.</p> <p>Spill kits will be maintained in the immediate area of transfer to respond to any releases.</p>	<p>All ASTs are provided with secondary containment.</p> <p>ASTs that are located in a building(s) where the floor drain discharges to an oil/water separator or holding tank. All floor drains that do not discharge to and oil/water separator/holding tanks are sealed.</p>

SPILL PREVENTION MEASURES		
	NON-STRUCTURAL	STRUCTURAL
CONTAINERS/DRUMS	<p>Routine weekly inspections are performed for all containers/drums.</p> <p>Container/drum storage areas are maintained in an orderly manner.</p> <p>CTDOT personnel are to be present during drum deliveries or removals from the drum/container storage area(s). No deliveries should be unattended.</p> <p>The environmental equivalent of integrity testing is achieved with the following:</p> <ul style="list-style-type: none"> • The drums are off the ground or have an impermeable barrier between the tank and the ground (i.e. storage on spill containment pallets) • The drums are inspected on a weekly and monthly basis. 	<p>Drums are stored atop grated spill pallets, or equivalent, which provide secondary containment.</p> <p>Some/All of the drums are located in a building(s) where the floor drain discharges to an oil/water separator or holding tank. All floor drains that do not discharge to an oil/water separator/holding tanks are sealed.</p>
OIL/WATER SEPARATORS/HOLDING TANKS	Routine inspections are performed for all oil/water separators/holding tanks.	Electrical tank monitoring systems are utilized.
EMERGENCY GENERATORS	Routine monthly inspections are performed for all emergency generators containing fuel reservoirs.	

13.1.1 SITE SECURITY

As per Section 40 CFR 112.7(g) regarding site security, the facility is:

1. Fully fenced and the entrance gates are locked when the facility is unattended.
2. Adequately lighted, such as to assist in the:
 - Discovery of discharges occurring during hours of darkness.
 - Prevention of discharges occurring through acts of vandalism.
3. Facility building doors are locked when unattended.
4. Fill ports are kept locked, and valves maintained in the off position.

14 SPCC PLAN CERTIFICATION

14.1 SPCC CERTIFICATION & PLAN REVIEW

CTDOT is fully committed to providing the necessary resources to implement the Plan.

MANAGEMENT SIGNATURE

Signature: _____ Date: 3/26/2026

Name: Jason Coite, PE

Connecticut Department of
Transportation
2800 Berlin Turnpike
Newington, CT 06111

PROFESSIONAL ENGINEER CERTIFICATION

In accordance with 40 CFR 112.3(d), I certify that this Spill Prevention, Control, and Countermeasure (SPCC) Plan satisfies the requirements of 40 CFR 112. By means of this certification, I attest: (i) that I am familiar with the requirements of 40 CFR 112; (ii) that I or my agent has visited the examined the facility; (iii) that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR 112; (iv) that procedures for required inspections and testing have been established, and (v) that this SPCC Plan is adequate for this facility.

Signature: Thomas Battles Date: 3/25/2026

Name: Thomas Battles, PE

HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032



Registration Number: PEN0015472

14.2 CERTIFICATION OF 5-YEAR REVIEW OF SPCC PLAN

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan will be completed every 5 years at a minimum. As a result of this review and evaluation, this SPCC Plan will be amended to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge from the facility. Any amendments will be implemented as soon as possible but not later than six months following the preparation of any amendment. Any technical amendments to the SPCC Plan must be certified by a Professional Engineer as per Section 112.3(d).

Management must document the completion of the review and evaluation and must sign a statement as to whether the Plan will be amended.

Review No. _____

I have completed a review and evaluation of the SPCC Plan for the _____
____ facility on _____ and will/will not amend the Plan as a result.

Signature: _____

Date: _____

Name: Jason Coite, PE

Title: Transportation Principal Engineer

Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

15 CERTIFICATE OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Because this facility cannot, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines pursuant to 40 CFR 112.20 (a)(2), the following page is the Certificate of the Applicability of the Substantial Harm Criteria as required under 40 CFR 112.20 (e).

CERTIFICATE OF THE APPLICABILITY OF THE
SUBSTANTIAL HARM CRITERIA
40 CFR 112.20(e)

Facility Name: Milford Maintenance & Repair & Bridge Garages

Facility Address: 44 Banner Drive
Milford, CT

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000-gallons?
Yes No
2. Does the facility have a total oil storage capacity greater than or equal to one million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground storage tank plus sufficient freeboard to allow precipitation within any aboveground oil storage tank area?
Yes No
3. Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in of 40 CFR 112 Attachment C- III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes No
4. Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in of 40 CFR 112 Attachment C-III or a comparable formula¹) such that a discharge from the facility would shut down public drinking water intake²?
Yes No
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes No

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name (Type or Print): Jason Coite, PE

Title: Transportation Principal Engineer

Signature: _____

Date: 3/26/2026

¹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

² For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

16 CROSS-REFERENCE MATRIX

SPCC Regulations		CTDOT ICP	
Citations (40CFR)	Brief Description	Section No.	Section Title
112.7(a)(3)	Description of facility physical layout, facility diagram	Section 1	General Facility Information
		Section 2	Facility Maps and Diagrams
112.7(a)(3)(i)	Oil type and storage capacity	Section 11	Material Handling and Storage
112.7(a)(3)(ii)	Discharge prevention measures	Section 13	Prevention Measures
112.7(a)(3)(iii)	Drainage control	Section 13	Prevention Measures
112.7(a)(3)(iv)	Countermeasures for spills	Volume I	Spill Response Procedures
112.7(a)(3)(v)	Methods of disposal	Volume I	Spill Response Procedures
112.7(a)(3)(vi)	Contact lists	Volume I	Facility Information
112.7(a)(4)	Information & procedures for spill reporter	Volume I	Spill Response Procedures
112.7(a)(5)	Emergency procedures	Volume I	Spill Response Procedures
112.7(b)	Trajectory analysis	Section 12	Potential Spill Predictions and Discharge Patterns
112.7(c)	Secondary containment	Section 13	Prevention Measures
112.7(d)	Contingency plans	N/A	
112.7(e)	Inspections, tests, and records	Volume I	Comprehensive Site Compliance Evaluation
112.7(f)	Personnel training	Volume I	Employee Training
112.7(g)	Site security	Section 14	Site Security
112.7(h)	Facility tank car and tank truck loading/unloading racks	N/A	
112.7(i)	Brittle fracture evaluation	N/A	
112.7(j)	Discussion of other regulations		Preface
112.20(e)	Certificate of the Applicability of the Substantial Harm Criteria	Section 16	Certificate of the Applicability of the Substantial Harm Criteria

PART 4

APPENDICES

APPENDIX A

WEBSITE LINK TO GENERAL PERMIT FOR THE DISCHARGE OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES

AND

COPIES OF FACILITY'S GENERAL PERMIT REGISTRATION FORM, CERTIFICATION OF REGISTRATION, AND AUTHORIZATION LETTER



Connecticut

Department of Energy & Environmental Protection



To access the Industrial Stormwater General Permit webpage:

- <https://portal.ct.gov/deep/water-regulating-and-discharges/stormwater/industrial-stormwater-gp>

APPENDIX B

INTERNAL SPILL DOCUMENTATION FORM

CTDOT Spill Response and Reporting

OEC Spill Phone # (860) 690-7509

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

* Required

1.

- **PLEASE READ ALL THE INFORMATION BELOW BEFORE FILLING OUT THE FORM**
- **OEC SPILL PHONE NUMBER** (860) 690-7509
- SECONDARY SPILL PHONE NUMBER (OEC PRINCIPAL ENGINEER) - (860) 594-3404
- If a volatile material (i.e. gasoline) is spilled and a fire danger condition exists - EVACUATE THE AREA, STOP ALL HOT WORK, AND KEEP A SAFE DISTANCE. CALL 911
- Roadside discoveries of unknown material are NOT included in this procedure. For containers of unknown materials found along the side of the road, contact the CTDEEP Emergency Spill Response directly (866) 337-7745. If additional assistance is needed, call Office of Environmental Compliance during normal working hours or the **OEC spill phone if an immediate danger exists.**
- Leaks (not from pumping into a vehicle but from internal parts of the fueling system to the dispenser containment system) less than 1 gallon may be cleaned up and waste containerized, but must be immediately reported to **OEC spill phone.**
 - If the spill is cleaned up by Maintenance staff, contact OEC during regular business hours to coordinate material disposal.
- EXEMPTIONS FROM REPORTING: Minor sheen on roadway, parking lot, or driveway from normal vehicle use.

2. Name *

Enter your answer

3. Phone Number *

Enter your answer

4. Is the spill at a DOT facility? *

Yes

No

5. For spills at a DOT facility, is it from DOT equipment? *

Yes

No

6. Is the spill more than 1 gallon? *

Yes

No

7. Do you know what the material is? *

Yes

No

8.

- Call CTDOT Environmental Compliance **IMMEDIATELY** at (860) 690-7509 -
If no answer: (860) 590-3404
- Call CTDOT Division of OH&S at (860) 594-3104
- Isolate spill if safe to do so.

9. Date of Spill *

Please input date (M/d/yyyy)



10. Time of Spill *

Enter your answer

11. Material Spilled *

Enter your answer

12. Quantity Spilled *

Enter your answer

13. Location of Spill *

Include address (if available) or nearest site identifying features. For example, Route 8 Northbound - Thomaston between Exits 37 and 38.

Enter your answer

14. Facility *

Select your answer



15. Spill Case #

To be entered by OEC in the office ONLY for spills reported to CTDEEP.

Enter your answer

16. Actions Taken *

Include a short description of actions taken - Examples: Called OEC and OEC initiated spill cleanup;
Less than one gallon spill, cleaned by Maintenance crew

Enter your answer



password.

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APPENDIX C

REPORT OF PETROLEUM OF CHEMICAL PRODUCT DISCHARGE, SPILLAGE OR RELEASE

APPENDIX D

LIST OF AMENDMENTS

LIST OF AMENDMENTS

Date	Section(s)	Amended by:	Brief Description of Amendment
	Vol. 1 Field Implementation Guide, Section 2		Pollution Prevention Team Contact Information

APPENDIX E

LIST OF CORRECTIVE ACTIONS, REPORTS, AND DOCUMENTATION

Items to be Implemented	Scheduled Completion Date	Person Responsible for Action	Signature/Date or Alternative Action Taken
Insert text here			