

**MS4 General Permit**  
**Town of Simsbury 2017 Annual Report**  
**Existing MS4 Permittee**  
**Permit Number GSM 000071**  
**[January 1, 2017 – December 31, 2017]**

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This report documents the Town of Simsbury's efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2017 to December 31, 2017.

**Part I: Summary of Minimum Control Measure Activities**

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

**1.1 BMP Summary**

<b>BMP</b>	<b>Status</b>	<b>Activities in current reporting period</b>	<b>Measurable goal</b>	<b>Department / Person Responsible</b>	<b>Due</b>	<b>Date completed or projected completion date</b>	<b>Additional details</b>
1-1 Implement public education and outreach	In Progress	Reviewed past materials.	Publish new materials.	Engineering / A.Kessler	Jul 1, 2018	Jun 15, 2018	
1-2 Address education/ outreach for pollutants of concern*	In Progress	Reviewed past materials and researched	Publish new materials.	Engineering / A.Kessler	Jul 1, 2018	Jun 15, 2018	
<b>Additional BMP:</b> 1-3 Hazardous Waste Collection	Completed	In partnership with Farmington, Canton, Granby and Avon, three Hazardous Waste Collection days were provided on April 29 <sup>th</sup> , June 17 <sup>th</sup> and October 28 <sup>th</sup> .	Provide Hazardous Waste Collections	DPW / T.Roy	NA	Apr 29, 2017 Jun 17, 2017 Oct 28, 2017	Collection days were advertised via Town website(s) and First Selectwoman's report.

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

An updated informational document (flyer or other) will be prepared to target Best Management Practices related to bacteria impairments for homeowners and farmers. The document would be included with all farm land leases as well as available at the Town Hall and mailed to all active farms.

Hazardous Waste Collection days will continue in partnership with neighboring Towns.

**1.3 Details of activities implemented to educate the community on stormwater**

<b>Program Element/Activity</b>	<b>Audience (and number of people reached)</b>	<b>Topic(s) covered</b>	<b>Pollutant of Concern addressed (if applicable)</b>	<b>Responsible dept. or partner org.</b>
RiverSmart Display at Burgers on the Bridge	Fundraiser for the Old Drake Hill Flower Bridge	Landscaping, runoff reduction, water/waste, etc.		Farmington River Watershed Association
"My Healthy Stream" – Handbook	Not Available	Water cycle, stream health, urban watersheds, etc.	Direct discharge from impervious surfaces. Oil, herbicide, pesticides, etc.	Handbook provided by Farmington River Watershed Association and made available by Planning Dept.
Link to CT DEEP website on Engineering webpage	Not Available	State Regulations, etc.		Engineering
Link to CT NEMO program on Engineering webpage	Not Available	Stormwater, MS4, etc.	General information on all pollutants of concern	Engineering
Link to Draft Stormwater Management Plan	Not Available	MS4 BMPs, etc.	Bacteria	Engineering

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

### 2.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-1 Comply with public notice requirements for the Stormwater Management Plan	Complete	Public Notice posted to Town Website	Notice posted in a public place.	Engineering/ A.Kessler	Apr 3, 2017	March 30, 2017	
2-2 Comply with public notice requirements for Annual Reports	Complete	Public Notice posted to Town Website	Post Notice to public via Town Website.	Engineering / A.Kessler	Feb 15, 2018	January 31, 2018	

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

During the process of revising the Town regulations regarding development, zoning, etc., all public hearings and meetings will include public involvement and participation. Stormwater regulations will be updated at this time as part of the process. At the time of this report, we anticipate these meetings to occur in 2018 and/or 2019.

A revision to the Stormwater Plan will be posted during 2018.

### 2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	Y	March 30, 2017	<a href="https://www.simsbury-ct.gov/sites/simsburyct/files/uploads/swmpln_simsbury-rev0.pdf">https://www.simsbury-ct.gov/sites/simsburyct/files/uploads/swmpln_simsbury-rev0.pdf</a>
Availability of Annual Report announced to public	Y	1/31/2018	<a href="https://www.simsbury-ct.gov/sites/simsburyct/files/uploads/public_notice_201">https://www.simsbury-ct.gov/sites/simsburyct/files/uploads/public_notice_201</a>

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

#### 3.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	In progress	Town is in process of completing written IDDE program using the CT IDDE program template.	Develop written plan of IDDE program	Engineering / A.Kessler	Jul 1, 2018	Anticipate completing by the deadline of July 1, 2018.	
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	Complete	Town is in a QA/QC process of reviewing GIS system and adding data as needed.	All Outfalls Mapped	Engineering / A.Kessler	Jul 1, 2019	Fall 2017	Mapping will be ongoing as outfalls are tested/repared/etc.
3-3 Implement citizen reporting program	Complete	Discussions regarding alternative programs beyond reporting through Town website and DPW phone line.	Provide reporting mechanism	Public Works	Jul 1, 2017	Completed under previous permit.	Citizens may report Illicit Discharges as they would report other concerns to DPW.
3-4 Establish legal authority to prohibit illicit discharges	Completed	Town Ordinance/Regulations and WPCA Regulations prohibit illicit discharges.	Prohibit illicit discharges via Ordinance / Regulations	Engineering / A.Kessler	Jul 1, 2018	Completed.	Town Staff will review existing ordinance and regulation to determine whether an update is necessary.
3-5 Develop record keeping system for IDDE tracking	Complete	Town continues to maintain a list among other reports that DPW receives. No reports were received in 2017.	Maintain list.	Public Works	Jul 1, 2017	Completed under previous permit.	Town Staff will review existing procedure to determine whether an update is necessary to streamline process(see Additional BMP 3-8)
3-6 Address IDDE in areas with pollutants of concern	In progress	Data gathering	Test outfalls that discharge to impaired streams	Engineering / A.Kessler	Not specified	Coincide with BMP 3-1.	Simsbury's impaired waters are within the Urbanized Area. Outfall testing will overlap.

<b>Additional BMP:</b> 3-7 Improve Citizen reporting program	Not started	Provide easier reporting mechanism to streamline and interface with GIS System.	Deploy new reporting mechanism	Engineering / A.Kessler	-	Jul 1, 2021	Reason for addition: Make it easier to report and track via GIS system.
<b>Additional BMP:</b> 3-8 Consolidate / Streamline IDDE tracking spreadsheets	Not started	Compile all the IDDE tracking requirements into one spreadsheet and implement via GIS System.	Create new database.	Engineering / A.Kessler	-	Jul 1, 2020	Reason for addition: Make it easier to track all IDDE activities via GIS system.

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

The written program will be posted to the Department of Public works webpage and a link listed in next year's Annual Report; will update the written IDDE program as needed throughout the permit term.

In order to improve upon procedures developed under the previous permit, we intend to maintain master IDDE tracking spreadsheet and ensure all employees involved in IDDE program understand the logging process.

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

Date of Report	Location / suspected source	Response taken
None Reported in 2017.		

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

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
No illicit discharges were reported since Jul. 2012 as of the end of the reporting period. Simsbury continues to extend the sanitary sewer network to areas with a history of septic failures.						
The Town of Simsbury does not have Sanitary Sewer Overflows.						

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

At this time, residents are directed to report illicit discharges to the Department of Public Works. Investigations are performed by DPW Staff.

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

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known
Farmington Valley Health District receives and maintains records of septic failures along with actions taken. All sanitary sewer connections and system extensions are managed by the Simsbury Water Pollution Control Authority (WPCA). The sanitary sewer system has been expanded each year with a focus on areas of known septic failures. The Town will begin to formally coordinate with WPCA regarding records of septic failures.		

### 3.7 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	300 (est.)
Estimated or actual number of interconnections	20 (est.)
Outfall mapping complete	95%
Interconnection mapping complete	30%
System-wide mapping complete (detailed MS4 infrastructure)	95%
Outfall assessment and priority ranking	15%
Dry weather screening of all High and Low priority outfalls complete	0
Catchment investigations complete	0
Estimated percentage of MS4 catchment area investigated	0%

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

Best Management Practices training is provided to all DPW Staff when new procedures are appropriate as determined by the Director of Public Works. BMP training includes IDDE identification.

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

### 4.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MS4 general permit	In Progress	Engineering is in the process of updating current regulations.	Publish revised land use regulations	Planning/Engineering	Jul 1, 2019	Anticipate completed by the Jul 1, 2019 deadline.	In general, Town regulations meet current standards.
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	Complete	None.		Planning / C.Vibert	Jul 1, 2017	Completed under previous permit.	Applications are received by the Planning Dept. and circulated to appropriate departments.
4-3 Review site plans for stormwater quality concerns	Complete	10 Land Development Applications were reviewed during the 2017 calendar year.	Issue review comments and review revised plans for compliance.	Engineering / A.Kessler	Jul 1, 2017	Completed under previous permit.	
4-4 Conduct site inspections	Complete	Approximately 100 site inspections were conducted during 2017 at sites ranging from single lot house additions to large developments.	Inspection reports generated.	Planning / M.Glidden	Jul 1, 2017	Program completed under previous permit and is ongoing.	Third-Party E&S Inspection Reports for developments with over 5 acres of disturbance are provided to the Town for information and review.
4-5 Implement procedure to allow public comment on site development	Complete	Planning, Zoning and Conservation Commission Meetings allow public comment on all applications.	Provide time for public comment.	Planning	Jul 1, 2017	Completed under previous permit.	
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	Complete	Continue to notify developers via comments.	Include notification with application comments.	Planning / Engineering	Jul 1, 2017	Completed under previous permit.	
<b>Example additional BMP:</b> 4-7 Develop stormwater compliance checklist	Complete	Checklist is provided to developers.	Standardize plan review	Planning / M.Glidden	-	Jul 1, 2018	Reason for addition: Acknowledge and track BMP achieved under previous permit.



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

None.

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

**5.1 BMP Summary**

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	Complete	None	Publish Town LID guidelines.	Planning	Jul 1, 2021	9/30/2011	
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	Complete	None.	Reference LID Guidelines in review comments	Planning	Jul 1, 2019	2011	
5-3 Identify retention and detention ponds in priority areas	In Progress	None.	Add locations / data to GIS system	Engineering	Jul 1, 2019	Anticipate completing by the Jul 1, 2019 deadline	
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	Complete	None.	Adequately maintain basins and treatment structures.	DPW	Jul 1, 2019	Completed under previous permit.	Treatment structures are cleaned once per year in conjunction with Catch Basin cleaning. Basins are inspected and maintained as needed.
5-5 DCIA mapping	In Progress	Review available data	Map DCIA on the GIS system	Engineering / A.Kessler	Jul 1, 2020	Anticipate completing by the Jul 1, 2020 deadline.	

5-6 Address post-construction issues in areas with pollutants of concern	Not Started	None.	Retrofit projects		Not specified		

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

Review and inspect all Town-owned/maintained facilities. Consider additional maintenance measures and potential alternatives to ensure a sustainable program.

## 5.3 Post-Construction Stormwater Management reporting metrics (To Be Completed)

Metrics	
Baseline (2012) Directly Connected Impervious Area (DCIA)	acres
DCIA disconnected (redevelopment plus retrofits)	acres this year / acres total
Retrofits completed	#
DCIA disconnected	% this year / % total since 2012
Estimated cost of retrofits	\$
Detention or retention ponds identified	# this year /# total

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

The Town anticipates estimating baseline DCIA using the data available on the CLEAR GIS site.

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

### 6.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-1 Develop/implement formal employee training program	On-going / Completed	Staff attended various seminars/webinars.	Key Staff attends yearly training related to stormwater.	Engineering / DPW / Planning	Jul 1, 2017	M.Glidden (Planning) 2/1/2017 CAZEO Meeting w/ MS4 Update A.Kessler (Engineering) 7/28/2017 Nitrogen Pollution Webinar 9/27/2017 IDDE Workshop	
6-2 Implement MS4 property and operations maintenance	On-going / Completed	Parks Department instituted a carry-in/carry-out policy for all parks. (5/8/17)	Publish and report on updated maintenance policy.	Culture, Parks and Recreation Commission	Jul 1, 2018	Completed under previous permit.	Per the Town Stormwater Plan, MS4 property and operations maintenance has been in place under the previous permit and continues. Additional measures will be noted here in subsequent reports.
6-3 Implement coordination with interconnected MS4s	In Progress	Mapping of interconnections continued. Reviewed	Update GIS system with interconnect locations	Engineering / A.Kessler	Not specified	Jul 1, 2019	
6-4 Develop/implement program to control other sources of pollutants to the MS4	Not Started.	None.			Not specified		
6-5 Evaluate additional measures for discharges to impaired waters*	Completed	Parks Department evaluated a carry-in/carry-out policy that will address pet waste (bacteria), which was implemented as noted above.	Provide information in Annual Report	Various	Not specified	Winter/Spring 2017	

6-6 Track projects that disconnect DCIA	In Progress	Tracking began with 2017 projects, look-back to 2012 continues.	Provide data with Annual Report once look-back is completed	Engineering / A.Kessler	Jul 1, 2017	Anticipate completing the 2012 look-back portion by Jul 1, 2018	All projects are required to treat the WQV per regulations. Quantifying areas/methods continue for pre-2017 developments.
6-7 Implement infrastructure repair/rehab program	Completed	<u>Drainage System Rehab:</u> Nod Road <u>Sanitary Sewer Rehab:</u> Maple Court <u>Storm Structure Repair:</u> Various Locations	Provide data with Annual Report	DPW / T.Roy	Jul 1, 2021	Completed under previous permit. Work is on-going as areas of need are identified.	
6-8 Develop/implement plan to identify/prioritize retrofit projects	Not Started	NA	Include plan with Annual Report.	Engineering / DPW	Jul 1, 2020	Anticipate completing by the Jul 1, 2020 deadline	
6-9 Implement retrofit projects to disconnect 2% of DCIA	Not Started	NA	Include project reports in Annual Report	Engineering / DPW	Jul 1, 2022	Anticipate completing by the Jul 1, 2022 deadline	
6-10 Develop/implement street sweeping program	Complete	326 lane miles were swept following the winter season.	Add data to Annual Report	DPW / T.Roy	Jul 1, 2017	Completed under previous permit.	
6-11 Develop/implement catch basin cleaning program	Complete	1,071 Catch Basins were cleaned.	Add data to Annual Report	DPW / T.Roy	Jul 1, 2020	Completed under previous permit.	
6-12 Develop/implement snow management practices	Complete	326 lane miles were treated during 2016-2017 Winter Season.	Add data to Annual Report. Provide update if needed.	DPW / T.Roy	Jul 1, 2018	Completed under previous permit.	

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

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**6.3 Pollution Prevention/ Good Housekeeping reporting metrics**

Metrics	
Employee training provided for key staff	<u>M.Glidden (Planning)</u> 2/1/2017 CAZEO Meeting w/ MS4 Update <u>A.Kessler (Engineering)</u> 7/28/2017 Nitrogen Pollution Webinar 9/27/2017 IDDE Workshop
Street sweeping	
Curb miles swept	326 miles
Volume (or mass) of material collected	903 CY
Catch basin cleaning	
Total catch basins in priority areas	TBD
Total catch basins in MS4	TBD
Catch basins inspected	N/A
Catch basins cleaned	1071
Volume (or mass) of material removed from all catch basins	Not Documented
Volume removed from catch basins to impaired waters (if known)	N/A
Snow management	
Type(s) of deicing material used	Clearlane Salt / Magnesium Chloride
Total amount of each deicing material applied	2442 Tons (Salt) 10,500 Gal. MgCl <sub>2</sub>
Type(s) of deicing equipment used	All-Season truck body, direct application MgCl <sub>2</sub> to Salt
Lane-miles treated	165 miles
Snow disposal location	Parking Lot @ Iron Horse Blvd.
Staff training provided on application methods & equipment	Yes
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	N/A
Reduction in turf area (since start of permit)	N/A

Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	\$

#### 6.4 Catch basin cleaning program

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

The Town of Simsbury is currently operating on a 3-4 year cleaning cycle for all catch basins in Town.

#### 6.5 Retrofit program

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

N/A (2017)

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

N/A (2017)

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

N/A (2017)

**Part II: Impaired waters investigation and monitoring [This section required beginning with 2018 Annual Report]**

**1. Impaired waters investigation and monitoring program**

**1.1 Indicate which stormwater pollutant(s) of concern occur(s) in your municipality or institution.** This data is available on the MS4 map viewer: <http://s.uconn.edu/ctms4map>.

Nitrogen/ Phosphorus ☐ Bacteria ☒ Mercury ☐ Other Pollutant of Concern ☐

**1.2 Describe program status.**

Discuss 1) the status of monitoring work completed, 2) a summary of the results and any notable findings, and 3) any changes to the Stormwater Management Plan based on monitoring results.

**2. Screening data for outfalls to impaired waterbodies (Section 6(i)(1) / page 41)**

**2.1 Screening data collected under 2017 permit**

Complete the table below for any outfalls screened during the reporting period. Each Annual Report will add on to the previous year's screening data showing a cumulative list of outfall screening data.

Outfall ID	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?

**2.2 Credit for screening data collected under 2004 permit**

If any outfalls to impaired waters were sampled under the 2004 MS4 permit, that data can count towards the monitoring requirements under the modified 2017 MS4 permit. Complete the table below to record sampling data for any outfalls to impaired waters under the 2004 MS4 permit.

Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?




### 3. Follow-up investigations (Section 6(i)(1)(D) / page 43)

Provide the following information for outfalls exceeding the pollutant threshold.

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

### 4. Prioritized outfall monitoring (Section 6(i)(1)(D) / page 43)

Once outfall screening has been completed for at least 50% of outfalls to impaired waters, identify 6 of the highest contributors of any pollutants of concern. Begin monitoring these outfalls on an annual basis by July 1, 2020.

Outfall	Sample Date	Parameter(s)	Results	Name of Laboratory (if used)

**Part III: Additional IDDE Program Data** [[This section required beginning with 2018 Annual Report](#)]

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

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

1. Catchment ID (DEEP Basin ID)	2. Category	3. Rank

**2. Outfall and Interconnection Screening and Sampling data** (Appendix B (A)(7)(d) / page 7)

**2.1 Dry weather screening and sampling data from outfalls and interconnections**

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

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

## 2.2 Wet weather sample and inspection data

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

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

## 3. Catchment Investigation data (Appendix B (A)(7)(e) / page 9)

### 3.1 System Vulnerability Factor Summary

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

Outfall ID	Receiving Water	System Vulnerability Factors

Where SVFs are:

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

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

### 3.2 Key junction manhole dry weather screening and sampling data

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

### 3.3 Wet weather investigation outfall sampling data

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants

### 3.4 Data for each illicit discharge source confirmed through the catchment investigation procedure

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

#### Part IV: Certification

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

Chief Elected Official or Principal Executive Officer	Document Prepared by
Print name: <i>Maria E. Capriola</i>	Print name: <i>Adam Kessler</i>
Signature / Date: <i>Maria E. Capriola / 3/29/18</i>	Signature / Date: <i>[Signature] 3/20/2018</i>