

Town of Simsbury Stormwater Management Plan Now Available for Comment

Pursuant to the requirements of Connecticut Department of Energy and Environmental Protection (CTDEEP) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4), the Town of Simsbury has prepared its Draft Stormwater Management Plan (SWMP), which applies to all Town-owned and -maintained property, including roadways. The MS4 Permit and SWMP will be active starting July 1, 2017. Progress and updates to the permit and plan will be described in the Annual Report released by April 1st of each year beginning in 2018.

The draft plan is available for public review and comment prior to its finalization as part of the 2017 MS4 Registration. Hardcopies of the plan are available during regular business hours at the Simsbury Engineering Department, 933 Hopmeadow Street, Simsbury, CT, or electronically on the Engineering Department webpage (www.simsbury-ct.gov/engineering).

Members of the public should submit their comments to:

By Email: DEEP.StormwaterStaff@ct.gov

OR

US Mail:

DEEP
Water Permitting and Enforcement Division
79 Elm Street
Hartford CT 06106
Attn: Karen Allen

Town of Simsbury



Connecticut

DRAFT STORMWATER MANAGEMENT PLAN

July 2017

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Introduction

This Stormwater Management Plan (SMP) was developed by the Town of Simsbury to protect water quality and reduce the discharge of pollutants from the municipality's storm sewer system to the maximum extent practicable (MEP). This SMP addresses the requirements established by the CT Department of Energy and Environmental Protection's (DEEP) General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4 General Permit). This permit is the local enforcement mechanism of the U.S. Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) Stormwater Phase II Rule.

SMP Structure

The plan outlines a program of best management practices (BMPs), measurable goals, responsible individuals or departments, and implementation schedules for the following six minimum control measures:

- (1) Public education and outreach
- (2) Public involvement and participation
- (3) Illicit discharge detection and elimination
- (4) Construction site stormwater runoff control
- (5) Post-construction stormwater management in new development and redevelopment
- (6) Pollution prevention/good housekeeping

Appendices to this plan include the CT DEEP General Permit for the Discharge of Stormwater from Small MS4s and a map of Simsbury's impaired waterbodies.

Area Subject to the Plan

The measures identified in this SMP will be applied throughout the boundaries of the Town of Simsbury except as otherwise noted and be consistent with the MS4 General Permit requirements. Stormwater discharge from municipally-owned maintenance garages, salt sheds and other facilities subject to the DEEP Industrial Stormwater General Permit will continue to be regulated under the conditions of that permit.

SMP Development

A stormwater committee led by the Public Works Department and Engineering Department including representatives from the Parks Department, Board of Education and Planning Department was assembled to coordinate the development and implementation of the SMP. The SMP's implementation will be tracked and documented in Annual Reports summarizing stormwater management activities carried out by the town and its partners. These reports will be submitted to DEEP on an annual basis no later than April 1.

Description of Municipality

The operator of the MS4 is the Town of Simsbury. The Town of Simsbury is a public entity located in the county of Hartford, State of Connecticut. The Town of Simsbury covers an area of approximately 34.5 square miles, located in the mid-region of the Farmington River Valley, approximately 14.5 miles west of Hartford. The east side of Simsbury is flanked by Talcott Mountain, part of the Metacomet Ridge, a mountainous ridgeline that stretches from Long Island to nearly the Vermont border.

The Connecticut Department of Transportation (DOT) operates an MS4 on state highways located in the Town of Simsbury. This system is regulated under the CT DOT's MS4 permit. Implementation of the BMPs identified in this plan will be coordinated between Simsbury and CT DOT.

Impaired Waters

In preparing the SMP, the CT DEEP's Water Quality Standards were reviewed in order to determine the Surface Water Quality Classifications for each watercourse in town. Certain BMP's address the watersheds containing watercourses designated as "impaired" by the CT DEEP. Table 1 shows the water quality classification for each

watershed. Table 2 summarizes the water bodies within or that run through the municipality that are listed on the 2014 List of Connecticut Water Bodies not meeting water quality standards and are designated as “impaired”.

TABLE 1 Water Quality Surface Classifications Simsbury, CT			
Drainage Basin Number	Name	Surface Water Quality Classification	Impaired per Water Quality Standards
4300-00_02	Farmington River	B	No
4300-32	Minister Brook	A	Yes
4300-33	Russell Brook	A	Yes
4300-39	Owens Brook	A	Yes
4300-44	Munnisunk Brook	A	No
4317-00	Nod Brook	A	Yes
4318-00	Hop Brook	A	Yes
4318-03	Stratton Brook	A	Not Assessed

TABLE 2 Simsbury Impaired Waterbody					
Waterbody ID	Water Segment Description	Water Segment Length (miles)	Impaired Use	Pollutant	Cause/Potential Source
Farmington River Watershed – Surface Water Quality Classification – A					
Minister Brook	Mouth of Farmington River, downstream (DS) of Route 202/10 crossing. Upstream (US) to Headwaters (HW) just east of Pine Glen Road.	1.82	Recreation	Bacteria	Urban Runoff/Stormwater runoff, illicit discharge, permit source, failing septic system, nuisance wildlife/pets, other
Russell Brook	Mouth of Farmington River, DS of Rt. 10 (202) road crossing, US to HW at White Foundation Pond, parallel to Deer Park Rd.	1.25	Recreation	Bacteria	Urban Runoff/Stormwater runoff, illicit discharge, permit source, failing septic system, nuisance wildlife/pets, other

Owens Brook	Mouth of Farmington River, DS of Rt. 10 (202) road crossing, US to HW parallel to Owen's Brook Blvd., between Musket Trail and Winterset Lane intersections with Owens Brook Blvd.	1.05	Recreation	Bacteria	Urban Runoff/Stormwater runoff, illicit discharge, permit source, failing septic system, nuisance wildlife/pets, other
Nod Brook	Mouth at Farmington River (located in Avon), upstream to headwaters (just US of Rocklyn Drive crossing).	6.95	Recreation	Bacteria	Urban Runoff/Stormwater runoff, illicit discharge, permit source, failing septic system, nuisance wildlife/pets, other
Hop Brook	Mouth at Farmington River, US to HW at Tuller Reservoir.	6.74	Recreation	Bacteria	Urban Runoff/Stormwater runoff, illicit discharge, permit source, failing septic system, nuisance wildlife/pets, other

The surface water classifications currently assigned to Simsbury watercourses are defined below.

Class A

Surface water is known or presumed to meet Water Quality Criteria which support designated uses, which may include potential drinking water supply; fish and wildlife habitat; recreational use; agricultural, industrial supply and other legitimate uses, including navigation. Allowable wastewater discharges include none other than clean water, drinking water treatment, and dredging and dewatering.

Class B

Surface water is known or presumed to meet Water Quality Criteria which support designated uses, which may include fish and wildlife habitat; recreational use; agricultural, industrial supply and other legitimate uses, including navigation. Allowable wastewater discharges include drinking water treatment, dredging and dewatering, and treated wastewater.

Based on the DEEP Surface Water Quality Classifications, all surface waters shall be equally evaluated in regards to focused action and BMP implementation. This was taken into consideration as the BMPs were developed.

(1) Public Education and Outreach

This minimum control measure outlines a program to communicate common sources of stormwater pollution and the impacts of polluted stormwater to the public. This will be done through distributing educational materials to the community and conducting outreach activities. The following BMPs and implementation schedule serve as Simsbury's MS4 Public Education Program.

Goals:

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

1.1 Implement public education program

Simsbury will collect and distribute stormwater educational materials that, at a minimum, address the impacts of the following on water quality: pet waste, impervious cover, application of fertilizers, pesticides, and herbicides, and illicit discharges and improper disposal of wastes into the MS4.

Simsbury will link UConn NEMO's comprehensive online library of stormwater educational material. The Simsbury Engineering Department website [www.simsbury-ct.gov/engineering] will link directly to this web-based library and promote the availability of these materials. Simsbury will also provide materials in a printed format to be on display in public locations within Simsbury Town Hall and Library.

1.2 Address education and outreach for pollutants of concern

Simsbury will distribute information on common sources of phosphorus, nitrogen, and bacteria pollution and how to prevent or reduce the amount reaching the MS4 and discharging into waterways. Given that all impaired waters as of the 2014 report indicate bacteria impairment, education materials will primarily focus on strategies related to bacteria sources.

Simsbury will consider many methods of communication and outreach each year based on need, type and available funding. BMP education for septic system maintenance may include an educational flyer included with building permits issued to new construction that includes a septic system. For broader education, a flyer will be included with an annual tax bill.

The table below shows additional topics to be covered to address the phosphorus, nitrogen, and bacteria, impairments that exist in Simsbury.

Phosphorus	Nitrogen	Bacteria
Septic systems	Septic systems	Septic systems
Fertilizer use	Fertilizer use	Sanitary cross connections
Grass clippings and leaves management	Grass clippings and leaves management	Waterfowl
Detergent use	Discharge of sediment (to which Nitrogen binds) from Construction sites	Pet waste
Discharge of sediment (to which Phosphorus binds) from Construction sites	Other erosive surfaces	Manure piles associated with livestock and horses
Other erosive surfaces		

Public outreach and education schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Implement public education program	Engineering	July 1, 2018 and continue until permit expires	Materials will be referenced in Annual Report
Address education/outreach for pollutants of concern	Engineering	July 1, 2018 and continue until permit expires	Materials will be referenced in Annual Report

(2) Public Involvement and Participation

This minimum control measure identifies the process for public involvement and participation in the town's stormwater management efforts.

Goals:

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

2.1 Comply with public notice requirements for the Stormwater Management Plan and Annual Reports

Simsbury will publish a notice under the 'News' section of the Town website [www.simsbury-ct.gov/news] to announce the availability of the plan and annual reports. Residents who are subscribed to receive announcements will receive all notices via email. The notice will provide a contact name, phone number, address, and email to whom the public can send comments. Additionally, this plan and the Annual Reports will be publicly accessible on the web [www.simsbury-ct.gov/engineering] and in Simsbury Town Hall. The public notice will allow for a 30-day comment period.

Public involvement and participation schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Comply with public notice requirements for the SMP and Annual Reports	Engineering	July 1, 2017 and continue until permit expires	Post Documents to website.

(3) Illicit Discharge Detection and Elimination

This minimum control measure outlines a program to detect and eliminate current illicit discharges to the MS4 and prevent further illicit discharges in the future. All activities for this measure will be completed in Simsbury priority areas (urbanized area, catchment areas with directly connected impervious area (DCIA) > 11%, and outfalls that discharge to impaired waters).

The Simsbury Stormwater Article, revised to September 28, 2011, includes a section regarding IDDE prohibiting illegal discharges to the stormwater system. This includes illegal connections regardless of whether such connection was permissible under law or practices applicable or prevailing at the time of connection.

Goal:

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

3.1 Develop written IDDE plan

Simsbury will develop a written IDDE plan to detect, locate and eliminate illicit discharges (to the maximum extent practicable) from the MS4 within Simsbury's priority areas. The IDDE plan will provide enforceable legal authority to eliminate illicit discharges, assign responsibilities, and develop a citizen reporting program. The plan will also outline the outfall screening and IDDE protocols consistent with Appendix B of the MS4 General Permit to identify, prioritize, and investigate MS4 catchments for suspected illicit discharge of pollutants. Also, the IDDE plan will outline follow-up screening and illicit discharge prevention procedures.

3.2 Develop list and map of all MS4 outfalls and interconnections in priority areas

Simsbury has developed and continues to update a database of all stormwater discharges from a pipe or conduit located within and owned or operated by the municipality and all interconnections with other MS4s. Each entry will include:

- a. Type, material, size, shape and location (identified with a latitude and longitude) of conveyance, outfall or channelized flow (e.g. 24" concrete pipe);
- b. the name, water body ID and Surface Water Quality Classification of the immediate surface waterbody or wetland to which the stormwater runoff discharges;
- c. if the outfall does not discharge directly to a named waterbody, the name and water body ID of the nearest named waterbody to which the outfall eventually discharges;
- d. the name of the watershed, including the subregional drainage basin number (available from CT ECO at www.cteco.uconn.edu) in which the discharge is located;
- e. date of most recent inspection of the outfall, the condition, and any indicators of potential non-stormwater discharges as of most recent inspection;

The database will be exported from the Town GIS system into excel format for annual reports.

3.3 Develop citizen reporting program

Simsbury will establish a system to allow for citizen reporting of suspected illicit discharges into the stormwater system. The system will include an email address and phone number for submitting a report. Simsbury will affirmatively investigate and eliminate any illicit discharges for which a time and location of discharge are provided. Simsbury will promptly inspect the reported outfall or manhole and proceed according to the requirements of the written IDDE program. All citizen reports and responses will be included in Simsbury annual report.

3.4 Establish legal authority to prohibit illicit discharges

Simsbury will update the necessary and enforceable legal authority by rules and regulations to eliminate illicit discharges. The regulations will:

- a. prohibit illicit discharges to its storm sewer system and require removal of such discharges consistent with the deadlines outlined in the MS4 general; and
- b. authorize the investigation of suspected illicit discharges and elimination of illicit discharge, including from properties not owned or controlled by the MS4 that discharge to the MS4
- c. control the discharge of spills and prohibit the dumping or disposal of materials including, but not limited to, residential, industrial and commercial wastes, trash, used motor vehicle fluids, pesticides, fertilizers, food preparation waste, leaf litter, grass clippings, and animal wastes into its MS4; and
- d. authorize appropriate enforcement procedures and actions;
- e. authorize fines or penalties and/or recoup costs incurred by the permittee from anyone creating an illicit discharge or spilling or dumping.

3.5 Develop record keeping system for IDDE tracking

Simsbury will keep a record of illicit discharge abatement activities including location (including latitude and longitude or address), description, date(s) of inspection, sampling data (if applicable), action(s) taken, date of removal or repair and responsible party.

In addition, Simsbury will develop and maintain a Sanitary Sewer Overflow (SSO) inventory that records the location, date and time of occurrence, estimated volume of discharge, a description of known or suspected cause, and details about mitigating measures including dates of implementation.

This inventory will also:

- include all known SSOs to their MS4 in the past 5 years (July 1, 2012 – June 30, 2017);
- continue to be updated to track future SSOs; and
- be included in Annual Reports.

3.6 Address IDDE in areas with pollutants of concern

Simsbury will identify which areas in town are most likely to contribute nitrogen, phosphorus, and bacteria to the MS4. This assessment will consider: historic on-site sanitary system failures, proximity to bacterial impaired waters, low infiltrative soils, and shallow groundwater. Any areas determined to have a high potential for septic system failure will be reported to the Farmington Valley Health District for corrective action.

3.7 Detailed MS4 infrastructure mapping

Simsbury will continue to update and maintain the Town GIS system that includes:

- Components of the MS4 within priority areas:
 - Outfalls & receiving waters;
 - Pipes; open channel conveyances; catch basins; manholes;
 - Interconnections with other MS4s and other storm sewer systems;
 - Municipally-owned stormwater treatment structures (e.g. detention & retention ponds, infiltration systems, bioretention areas, water quality swales, gross particle separators, oil/water separators, or other systems);
 - Catchment delineations for each outfall;
 - Impaired water bodies identified by name and use impairment as defined by the most recent integrated water quality report;
 - Municipal sanitary sewer system.

Simsbury will update the map as new information becomes available and will report on the progress of the development of this map in the annual report.

Illicit discharge detection and elimination schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Develop written IDDE program	Engineering	July 1, 2018	Include with Annual Report.
Develop list and maps of all MS4 stormwater outfalls in priority areas	Engineering	July 1, 2019	Include list with Annual Report
Develop citizen reporting program	DPW	July 1, 2018	Include with Annual Report.
Establish legal authority to prohibit illicit discharges	DPW	July 1, 2018	Include with Annual Report.
Develop record keeping system for IDDE tracking	DPW	July 1, 2017	Include with Annual Report.
Address IDDE in areas with pollutants of concern	Engineering	July 1, 2017	Include with Annual Report.
Detailed MS4 infrastructure mapping	Engineering	July 1, 2020	Complete.
Complete list and maps of all MS4 stormwater outfalls throughout municipality	Engineering	July 1, 2022	Complete.

(4) Construction Site Stormwater Runoff Control

This minimum control measure outlines procedures for minimizing polluted stormwater runoff from activities that disturb one or more acres of land. In Simsbury, this is determined on a site by site basis.

Goal:

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

4.1 Implement, upgrade and enforce land use regulations to meet requirements of MS4 general permit

Simsbury will revise its land use regulations to establish the legal authority to control stormwater runoff from construction sites by requiring:

- a. developers, construction site operators, or contractors maintain consistency with the 2002 Guidelines for Soil Erosion and Sedimentation Control, as amended, the Connecticut Stormwater Quality Manual, and all stormwater discharge permits issued by the DEEP within the municipal or institutional boundary pursuant to CGS 22a-430 and 22a-430b;
- b. the implementation of additional measures to protect/improve water quality (in addition to the above requirements) as deemed necessary by Simsbury;
- c. permittees shall provide a Stormwater Pollution Control Plan consistent with the State General Permit guidelines for all developments involving disturbance of one (acre) or more;
- d. Simsbury is authorized to carry out all inspection, surveillance and monitoring procedures necessary to determine compliance with municipal regulations, ordinances or programs or institutional requirements related to the management of Simsbury's MS4. Inspections shall be conducted, where allowed, to inventory the number of privately-owned retention ponds, detention ponds and other stormwater basins that discharge to or receive drainage from the permittee's MS4;
- e. the owner of a site seeking development approval from Simsbury shall provide and comply with a long term maintenance plan and schedule to ensure the performance and pollutant removal efficiency of privately-owned retention ponds, detention ponds and other stormwater basins that discharge to or receive discharge from Simsbury's MS4 including short-term and long-term inspection and maintenance measures to be implemented by the private owner; and
- f. Simsbury will control, through interagency or inter-jurisdictional agreements, the contribution of pollutants between the permittee's MS4 and MS4s owned or operated by others.

4.2 Develop and implement plan for interdepartmental coordination of site plan review and approval

The Simsbury Planning Department acts as the point person for all site plan applications, correspondence and comments. Applicant data, design and narratives as well as public comment (including interveners) will be assembled and distributed to each department (Engineering, Public Works, Water Pollution Control Authority, etc)

within three (3) days of receipt. This process ensures coordination in a timely manner to provide dialogue among departments for all site plan applications.

4.3 Review site plans for stormwater quality concerns

Simsbury will conduct site plan reviews that incorporate consideration of stormwater controls or management practices to prevent or minimize impacts to water quality on sites with soil disturbance of one acre or more. Simsbury will also conduct site inspections to assess the adequacy of the installation, maintenance, operation, and repair of construction and post construction control measures and take enforcement action when necessary.

Projects are reviewed for proximity to endangered or threatened species as it relates to the current NDDDB map available. Comments are made to applicants to submit NDDDB reviews for projects within areas of concern.

4.4 Conduct site inspections

Simsbury will perform construction site inspections and take enforcement actions if necessary to ensure the adequacy of the installation, maintenance, operation, and repair of all construction and post-construction runoff control measures.

4.5 Implement procedure to allow public comment on site development

Simsbury's procedure for public involvement in proposed and ongoing development and land disturbance activities is as follows:

1. Information received from the public is forwarded to the Planning Department;
2. Public comments are included with development applications, which are available to the public at Town Hall.
3. At public meetings (Inland Wetlands and Watercourses, Planning, Zoning, etc.), the public is routinely invited to speak as part of the record on applications.
4. Town Staff reviews and addresses, when appropriate, public comment as part of their review of development applications.

4.6 Implement procedure to notify developers about DEEP construction stormwater permit

Simsbury will notify developers and contractors of their potential obligation to obtain authorization under DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (construction general permit) if their project disturbs more than 1 acre of land and results in a point source discharge to Connecticut surface waters directly or through the Simsbury MS4. Simsbury will also require a copy of the Storm Water Pollution Control Plan be made available to the town as part of the land use permit process.

Construction site stormwater management schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Implement, upgrade and enforce land use regulations to meeting MS4 permit requirements	Planning	July 1, 2019	Progress will be referenced in Annual Report.
Develop/implement plan for interdepartmental coordination in site plan review and approval	Planning	July 1, 2017	Complete.
Review site plans for stormwater quality concerns	Engineering	July 1, 2017	Complete.
Conduct site inspections	Planning	July 1, 2017	Complete.
Implement procedure to allow public comment on site development	Planning	July 1, 2017	Complete.
Implement procedure to notify developers about DEEP construction stormwater permit	Planning	July 1, 2017	Complete.

(5) Post-construction Stormwater Management in New Development or Redevelopment

This minimum control measure outlines Simsbury's program to address stormwater runoff from new or re-development projects that disturb one or more acres of land.

Goal:

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

5.1 Update legal authority and guidelines regarding LID and runoff reduction in site development planning

Simsbury will update existing regulations that require, to the Maximum Extent Practicable (MEP), developers and contractors seeking the town's approval to consider the use of Low Impact Development (LID). Emphasis will be placed on runoff reduction site planning and development practices that meet or exceed those LID and runoff reduction practices in the CT Stormwater Quality Manual prior to other traditional stormwater management techniques.

This regulation update may include the following standards:

- 1) for redevelopment of sites that are currently developed with Directly Connected Impervious Area (DCIA) of forty percent or more, the project must retain on-site half the water quality volume for the site, or
- 2) for new development and redevelopment of sites with less than forty percent DCIA, retain 100% of the water quality volume for the site, or
- 3) if those retention standards cannot be met, the developer will be required to provide a report indicating why the standard could not be met and propose a mitigation project on another property or pay a fee to fund a DCIA retrofit.

In developing this legal authority, Simsbury will consider the following watershed protection elements to manage the impacts of stormwater on receiving waters:

- a. Minimize the amount of impervious surfaces (roads, parking lots, roofs, etc.) within each municipality by minimizing the creation, extension, and widening of parking lots, roads, and associated development and encourage the use of Low Impact Development or green infrastructure practices.
- b. Preserve, protect, create and restore ecologically sensitive areas that provide water quality benefits and serve critical watershed functions. These areas may include, but are not limited to; riparian corridors, headwaters, floodplains and wetlands.
- c. Implement stormwater management practices that prevent or reduce thermal impacts to streams, including requiring vegetated buffers along waterways, and disconnecting discharges to surface waters from impervious surfaces such as parking lots.
- d. Seek to avoid or prevent hydromodification of streams and other water bodies caused by development, including roads, highways, and bridges.
- e. Implement standards to protect trees, and other vegetation with important evapotranspirative qualities.
- f. Implement policies to protect native soils, prevent topsoil stripping, and prevent compaction of soils.

- g. Coordinate with state or local health officials to ensure no interference with performance of on-site septic systems.
- h. Limit turf areas.

In addition, Simsbury will review its current regulations - site planning requirements, zoning regulations, street design regulations, and infrastructure specifications with minimum size criteria for impervious cover (roads, parking lots, etc.) to identify and, where appropriate, reduce or eliminate existing regulatory barriers to implementation of LID and runoff reduction practices to the MEP.

5.2 Implement long-term maintenance plan for stormwater basins and treatment structures

Simsbury will review and update as necessary the maintenance plans for retention / detention ponds and stormwater treatment structures that it owns or over which it holds an easement or other authority and that are located in the town's priority areas to ensure their long-term effectiveness. This plan will require an annual inspection of those retention / detention ponds and stormwater treatment structures and removal of accumulated sediment and pollutants in excess of 50% design capacity.

5.3 Directly Connected Impervious Area (DCIA) mapping

Simsbury will follow guidance provided by DEEP and UConn CLEAR to calculate the Directly Connected Impervious Area (DCIA) that contributes stormwater runoff to each of its MS4 outfalls. Progress on this task will be documented in each Annual Report until completion.

5.4 Address post-construction issues in areas with pollutants of concern

For areas contributing to waters where **Nitrogen, Phosphorus** or **Bacteria** is a Stormwater Pollutant of Concern and erosion or sedimentation problems are found during the annual inspections conducted under the long-term maintenance plan described in BMP 5.2, Simsbury will prioritize those areas for the DCIA retrofit program under minimum control measure 6 – Pollution Prevention/Good Housekeeping.

Post-construction stormwater management schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Update legal authority and guidelines regarding LID and runoff reduction in site development planning	Planning	July 1, 2021	Publish revised guidelines / regulations. Reference in Annual Report when complete.
Enforce LID/runoff reduction requirements for development and redevelopment projects	Planning	July 1, 2021	Reference in Annual Report when complete.
Implement long-term maintenance plan for stormwater basins and treatment structures	DPW	July 1, 2019	Complete.
Complete DCIA mapping	Engineering	July 1, 2020	Publish DCIA map. Reference in Annual Report when complete.
Address post-construction issues in areas with pollutants of concern	Planning	July 1, 2019	Reference issuances of violations within Annual Report.

(6) Pollution Prevention / Good Housekeeping

This minimum control measure outlines a program to mitigate the impact of town operations and maintenance on town owned and/or operated properties and the MS4 itself to water quality.

Goal:

Prevent or reduce pollutant runoff as a result of municipal operations.

Simsbury will implement an operations and maintenance program to prevent or reduce pollutant runoff from town facilities and protect water quality. The program will apply to sites that are not covered by an individual industrial permit.

Simsbury contains areas of Endangered and Threatened Species and Aquifer Protection Areas, which stipulate additional review and permitting, may be required for new work. Prior to the start of new or retrofit projects, the Town will validate work locations against current NDDb mapping and Aquifer Protection Area mapping. In the event a project is within the limit(s) of either, the appropriate level of documentation and permitting will be sought per current regulations (State Endangered Species Act CGS section 26-310(a) or Aquifer Protection regulations (section 22a-354i(1)-(10)).

6.1 Develop and implement formal employee training program

Simsbury will continue its MS4 training program for town employees to increase awareness of water quality issues. Training will include:

- Standard operating procedures consistent with the MS4 general permit;
- General goals and objectives of this Stormwater Management Plan;
- Identification and reporting of illicit discharges and improper disposal; and
- Spill response protocols and responsibilities.

These trainings may also include regional or statewide trainings coordinated by UConn CLEAR or others. DPW will assess the needs of the department on a yearly basis to determine education schedule. Crew leaders typically provide training for new hires. Staff attend training seminars and conferences provided by CT Technology Transfer (T2) Center.

6.2 Implement MS4 property and operations maintenance

Simsbury-owned or -operated properties, parks, and other facilities that are owned, operated, or otherwise the legal responsibility of Simsbury will be maintained so as to minimize the discharge of pollutants to its MS4.

Such maintenance will include, but not be limited to:

(i) Parks and open space

Simsbury optimizes the application of fertilizers by municipal employees, institutional staff, or private contractors on lands and easements for which it is responsible for maintenance. All products are stored indoors and applied by certified applicators. Areas of new growth are treated with a standard organic 10-10-10 while for established turf, slow release polyon coated urea products are used and are typically applied two to three times per year. The greens at Simsbury Farms Golf Course are typically spoon fed every other week during the growing season.

Typical mowing schedules are weekly with some areas of the golf course receiving more frequent intervals. Clippings are returned to turf areas except for greens, tees and collars at the golf course. These clippings are composted throughout the site within the tree line. Clippings will not enter the MS4 system or waters of the state.

At parks with trash receptacles, pick-up is performed on a weekly basis. At the golf course, pick-up is conducted on a daily basis.

Future consideration will be given to the following items:

- the reduction or elimination of fertilizers in certain park areas;
- use of alternative fertilizers forms (i.e. products with reduced, slow-releasing, or insoluble phosphorus compositions);
- application schedule (i.e. appropriate season or month) and timing (i.e. coordinated with climatic conditions to minimize runoff potential);
- standard operating practices for the handling, storage, application, and disposal of pesticides and herbicides in compliance with applicable state and federal laws;
- evaluating reduced mowing frequencies and use of alternative landscaping materials like drought resistant and native plantings;
- reviewing procedures for management of trash containers at parks (scheduled cleanings; sufficient number).

(ii) Pet waste management

Simsbury maintains educational signage and pet waste baggies at some park facilities. Signage is posted prohibiting pet access to athletic fields in many locations. If issues arise at sites, patrols are typically increased to discourage violators.

In the future, Simsbury will identify locations where inappropriate pet waste management practices are immediately apparent and pose a threat to receiving water quality due to proximity and potential for direct conveyance of waste to its storm system and waters. In such areas, Simsbury will, implement targeted management efforts such as public education and enforcement (e.g. increased patrol for violators).

In Simsbury-owned recreational areas where dog walking is allowed, Simsbury will maintain their existing educational signage, pet waste baggies, and disposal receptacles (or require carry-out). Additional areas will be identified and considered for educational signage.

Simsbury will document its efforts in its annual reports. Information regarding the scope and extent of its education, compliance, and enforcement efforts will be included in the annual report.

(iii) Waterfowl management

Simsbury will identify lands where waterfowl congregate and feeding by the public occurs.

To raise awareness regarding the water quality impacts, Simsbury will install signage or use other targeted techniques to educate the public about the detrimental impacts of feeding waterfowl (including the resulting feces deposition) and discourage such feeding practices.

Simsbury will also implement practices that discourage the undesirable congregation of waterfowl in these areas, or otherwise isolate the direct drainage from these areas away from its storm system and waters where appropriate.

Waterfowl management at Simsbury Farms Golf Course will continue to operate under an existing permit with USDA.

(iv) Simsbury Buildings and facilities (schools under the jurisdiction of Simsbury, town offices, police and fire stations, pools, parking garages and other Simsbury-owned or operated buildings or utilities)

Simsbury will:

- evaluate the use, storage, and disposal of both petroleum and non-petroleum products and ensure, through employee training, that those responsible for handling these products know proper procedures;
- ensure that Spill Prevention Plans are in place, if applicable, and coordinate with the fire department as necessary;
- develop management procedures for dumpsters and other waste management equipment;
- sweep parking lots and keep areas surrounding the facilities clean to minimize runoff of pollutants;
- ensure that all interior building floor drains are not connected to the MS4 and are appropriately permitted.

(v) Vehicles and Equipment

Simsbury has established procedures for storage of Simsbury-owned or –operated vehicles to minimize potential impacts to the MS4 system. Any vehicle with fluid leaks shall be stored indoors or in a contained area until maintenance and repairs are performed. An indoor truck wash facility will be completed in early 2017 at the Public Works Garage to service Simsbury’s plow fleet. This truck wash will be directly connected to the sanitary sewer system and has been designed to avoid discharge to the MS4 system. The Parks Department will develop a vehicle wash station that utilized a closed-loop drainage system. When not in use, all drains are covered.

In addition to current practice noted above, Simsbury will:

- evaluate fueling areas owned by Simsbury and used by Simsbury-owned or -operated vehicles;
- continue to ensure that vehicle wash waters are not discharged to the municipal storm sewer system or to surface waters;
- ensure any interior floor drains are appropriately permitted.

(vi) Leaf Management

Historically and currently, Simsbury collects bagged leaves from residents in high volume locations to provide disposal and composting of resident’s leaf debris. On Town-owned and –operated property, Simsbury has implemented procedures to minimize or prevent the deposition of leaves in catch basins, streets, parking lots, driveways, sidewalks or other paved surfaces that discharge to the MS4.

6.3 Implement coordination with interconnected MS4s

Simsbury will coordinate with operators of interconnected MS4s (such as neighboring municipalities, institutions and DOT) regarding the contribution of potential pollutants from the storm sewer systems, contributing land use areas and stormwater control measures in the respective MS4s. This same coordination shall be conducted regarding operation and maintenance procedures utilized in the respective systems.

6.4 Develop and implement a program to control other sources of pollutants to the MS4

Since 2011, Simsbury has promoted Low Impact Development throughout Town through a guideline document for developments. Although the document is focused on the Town center, all applicants are directed to review and implement measures to the furthest extent feasible. Additional measures

Simsbury will continue to maintain the program to control the contribution of pollutants to its MS4 from commercial, industrial, municipal, institutional or other facilities, not otherwise authorized by a CT DEEP stormwater permit.

6.5 Evaluate additional measures for discharges to impaired waters

(i) For waters for which **Bacteria** is a Stormwater Pollutant of Concern:

On Simsbury-owned or -operated lands with a high potential to contribute bacteria (such as dog parks, parks with open water, sites with failing septic systems), Simsbury will investigate the feasibility of retrofits with consideration of available technology to correct the problem(s) within a specific timeframe. Alternatively, Simsbury will evaluate the effectiveness of developing a plan for source management. Each Annual Report will identify problem areas for which a retrofit or source management program were developed, the location of the closest outfall monitored in accordance with Section 6(i), the cost of such retrofit or program, and the anticipated pollutant reduction. On Simsbury-owned or -operated lands, prohibit the feeding of geese or waterfowl and implement a program to manage geese and waterfowl populations. Each Annual Report will discuss the actions taken to implement this program.

6.6 Track projects that disconnect DCIA

Simsbury will annually track the total acreage of Directly Connected Impervious Area (DCIA) that is disconnected from the MS4 as a result of redevelopment or retrofit projects within the town. For each retrofit/redevelopment project, Simsbury will document the amount of existing DCIA that is disconnected. The total amount of disconnected DCIA will be reported each year in the Annual Report. Starting on July 1, 2021, Simsbury's goal will be to reduce 1% of its total DCIA acreage per year to the maximum extent possible. Simsbury will provide updates on this goal in its annual report and will also incorporate all DCIA disconnections, which occurred in the town since July 1, 2012, towards meeting this goal.

6.7 Develop and implement an infrastructure repair, rehabilitation and retrofit program

Simsbury will continue a program to identify MS4 structures to repair, rehabilitate, or upgrade to reduce or eliminate the discharge of pollutants into water bodies. This program will be responsive to new information on outfalls discharging pollutants, impaired waters, inspections, or observations made during outfall mapping under the IDDE section of this plan.

6.8 Develop and implement plan to identify and prioritize retrofit projects

Simsbury will develop a Retrofit Project Plan to identify and prioritize potential DCIA disconnection projects. Prioritization will be based on several factors, including whether the project lies within one of the MS4 priority areas (urbanized area, DCIA > 11%, discharge to impaired waters). Simsbury will include in its annual report for the third year of the permit (2020-2021) its identification and prioritization process, a rationale for the selection of projects to be implemented, and the total acres of DCIA to be disconnected upon implementation. The implementation of projects in this plan will begin by June 30, 2022.

6.9 Develop and implement street sweeping program

Simsbury has implemented a program to provide for regular inspection and maintenance of Simsbury-owned or -operated streets, parking areas and other MS4 infrastructure.

Simsbury will review and update procedures for sweeping town-owned or operated streets and parking lots. All streets and parking lots within the MS4 Priority Areas will be inspected, swept and/or cleaned (as necessary) at least once per year in the spring following the cessation of winter maintenance activities (i.e. sanding, deicing, etc.). The procedures may also include more frequent inspections, cleaning and/or sweeping of targeted areas determined by Simsbury to have increased pollutant potential based on the presence of active construction activity or other potential pollutant sources. Simsbury will identify such potential pollutant sources based upon surface inspections, catch basin cleaning or inspection results, land use, winter road deicing and/or sand application, impaired or TMDL waters or other relevant factors as determined by Simsbury. If wet dust suppression is conducted, the use of water will be minimized such that a discharge of excess water to surface waters and/or the storm sewer system does not occur.

For streets and parking lots outside the MS4 Priority Areas, including any rural uncurbed streets and parking lots with no catch basins, Simsbury will either meet the minimum frequencies above, or develop and implement an inspection, documentation and targeted sweeping and/or cleaning plan for those areas by June 30, 2018 and submit such plan with its year one Annual Report. For new and redeveloped municipal parking lots, Simsbury will evaluate options for reducing stormwater runoff to surface waters and/or the storm sewer system by the installing pervious pavements and/or other measures to promote sheet flow of stormwater.

- a. Simsbury will ensure the proper disposal of street sweepings in accordance with DEEP policies, guidance and regulations. Sweepings shall not be discharged back into the storm drain system and/or surface waters.
- b. Simsbury will document results of its sweeping program in its annual reports including: curb miles swept, dates of cleaning, estimated volume or mass of material collected, and method(s) of reuse or disposal. Simsbury will also include documentation of any alternate sweeping plan for rural uncurbed streets and any runoff reduction measures implemented.

6.10 Develop and implement catch basin cleaning program

Simsbury will continue to conduct routine cleaning of all catch and will consider optimizing the cleaning program in the future. Utilizing information compiled through its inventory of catch basins, operational staff and public complaints, Simsbury will optimize routine cleaning frequencies for particular structures or catchment areas as follows to maintain acceptable sediment removal efficiencies:

- a. Inspect all Simsbury owned catch basins within MS4 Priority Areas at least once by June 30, 2020. Catch basins outside the MS4 Priority Areas shall be inspected by June 30, 2022.
- b. Prioritize inspection and maintenance for Simsbury-owned catch basins located near impaired waters and construction activities (roadway construction, residential, commercial, or industrial development or redevelopment). Simsbury will clean catch basins in such areas more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings.
- c. Establish a schedule such that the frequency of routine cleaning will ensure that no catch basin at any time will be more than fifty (50) percent full. A catch basin sump is more than 50 percent full if the contents within the sump exceed one half the distance between the bottom interior of the catch basin to the invert of the deepest outlet of the catch basin.

- d. If a catch basin sump is more than fifty (50) percent full during two consecutive routine inspections/cleaning events, Simsbury will document that finding, investigate the contributing drainage area for sources of excessive sediment loading, and to the maximum extent practicable, abate contributing sources. Simsbury will describe any actions taken in its Annual Report.
- e. Simsbury will detail its plan for optimizing catch basin cleaning, inspection plans, and its schedule for gathering information to develop the optimization plan in its first annual report. Documentation shall include metrics and other information used to reach the determination that the established plan for cleaning and maintenance is optimal for the MS4. Simsbury will keep a log of catch basins cleaned or inspected.
- f. Simsbury will report in each Annual Report the total number of catch basins, number inspected, number cleaned, estimated total volume or mass of material removed from all catch basins and, if practicable, the volume or mass of material removed from each catch basin draining to water quality limited waters.

6.11 Develop and implement snow management practices

(i) Deicing Material Management

Simsbury will develop and implement standard operating practices for the use, handling, storage, application, and disposal of deicing products to minimize exposure to stormwater; consider means to minimize the use and optimize the application of chloride-based or other salts or deicing product (while maintaining public safety) and consider opportunities for use of alternative materials; for any exterior containers of liquid deicing materials installed after July 1, 2017, Simsbury will provide secondary containment of at least 110% of the largest container or 10% of the total volume of all containers, whichever is larger, without overflow from the containment area.

De-icing products are stored under cover at the Public Works yard in accordance with the site's industrial permit. Other Town Departments, such as Parks and the Board of Education, utilize stockpile as well, which ensures consistency across Town-owned or -maintained facilities.

(ii) Snow and Ice Control Practices

For many years Simsbury has ceased sand application to Simsbury-owned roadways as a means of ice control. As a result, sedimentation of the MS4 system has been drastically reduced. Simsbury continues to implement and refine its standard operating practices regarding its snow and ice control to minimize the discharge of anti-icing or de-icing chemicals and other pollutants (while maintaining public safety).

For roadway de-icing and anti-icing procedures, trucks are equipped with spreaders that are speed-based to ensure consistent application. Additionally, total product applied during a run is recorded by each spreader.

Simsbury will continue to assess and establish goals for the optimization of chemical application rates through the use, where practicable, of automated application equipment (e.g. zero-velocity spreaders), anti-icing and pre-wetting techniques, implementation of pavement management systems, and alternate chemicals.

Simsbury maintains a record of the application anti-icing and/or de-icing chemicals to document the reduction of chemicals to meet established goals.

Simsbury will ensure the proper training for deicing applications for municipal employees, institutional staff, or private contractors on lands and easements for which it is responsible for maintenance.

Simsbury will manage and dispose of snow accumulations in accordance with DEEP's Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots, revised 2/4/11 and as amended (see link at: www.ct.gov/deep/stormwater).

In its Annual Report, Simsbury will document results of its snow removal program including, at a minimum: the type of staff training conducted on application methods and equipment, type(s) of deicing materials used; lane-

miles treated; total amount of each deicing material used; type(s) of deicing equipment used; any changes in deicing practices (and the reasons for the change); and snow disposal methods.

6.12 Interconnected MS4s

Simsbury will coordinate with operators of interconnected MS4s (such as neighboring municipalities, institutions and DOT) regarding the contribution of potential pollutants from the storm sewer systems, contributing land use areas and stormwater control measures in the respective MS4s. This same coordination will be conducted regarding operation and maintenance procedures utilized in the respective systems.

6.13 Sources contributing pollutants to the MS4

Simsbury will develop and implement a program to control the contribution of pollutants to its MS4 from commercial, industrial, municipal, institutional or other facilities, not otherwise authorized by permit issued pursuant to Sections 22a-430 or 22a-430b of the Connecticut General Statutes.

6.14 Additional measures for discharges to impaired waters (with or without a TMDL)

(i) For waters for which Bacteria is a Stormwater Pollutant of Concern:

On Simsbury-owned or -operated lands with a high potential to contribute bacteria (such as dog parks, parks with open water, sites with failing septic systems), Simsbury will investigate the feasibility of retrofits or source management techniques with consideration of available funding to develop a program to correct the problem(s) within a specific timeframe. Annual Reports will identify problem areas for which a retrofit or source management program were developed, the location of the closest outfall monitored in accordance with Section 6(i), the cost of such retrofit or program, and the anticipated pollutant reduction. On Simsbury-owned or -operated lands, Simsbury will prohibit the feeding of geese or waterfowl and implement a program to manage geese and waterfowl populations. Annual Reports will discuss the actions taken to implement this program.

Pollution prevention/ good housekeeping schedule

BMP	Lead department / individual	Month / year of implementation	Measurable goal
Develop/implement formal employee training program	DPW	July 1, 2017	Complete.
Implement MS4 property and operations maintenance	DPW	July 1, 2017	Complete.
Implement coordination with interconnected MS4s	DPW	July 1, 2017	Complete.
Develop/implement program to control other sources of pollutants to MS4	Planning	July 1, 2017	Complete
Evaluate additional measures for discharges to impaired waters	Engineering	July 1, 2017	Reference will be made in Annual Report.
Track projects that disconnect DCIA	Engineering	July 1, 2017	Number of projects tracked will be included in the Annual Report.
Develop/implement infrastructure repair/rehab program	DPW	July 1, 2017	Complete.
Develop/implement plan to identify/prioritize retrofit projects	DPW	July 1, 2020	Reference to plan and complete projects will be made in Annual Report.
Develop/implement street sweeping program	DPW	July 1, 2017	Complete.
Develop/implement catch basin cleaning program	DPW	July 1, 2017	Complete.
Develop/implement snow management practices	DPW	July 1, 2017	Complete.

Outfall Monitoring

Town of Simsbury will monitor and investigate all MS4 outfalls that discharge to impaired waterbodies by the end of the permit term. Using the outfall inventory developed under the IDDE minimum control measure, Simsbury will identify which outfalls discharge to impaired waters and screen them for the specific impairments.

Once half of all outfalls discharging to impaired waterbodies have been screened, the 6 outfalls contributing the highest level of pollutants will be identified and screened on an annual basis.

Based on the screening results, Simsbury will investigate the drainage areas of outfalls that are contributing to the impairment. The investigations may consider land use or development patterns, business or commercial activities, industrial activities, DCIA, natural contributors, MS4 maintenance issues, residential activities, or anything else potentially contributing to the source of the impairment.

Based on results of the drainage area investigations, Simsbury will implement measures to address sources of the impairments including the specific impaired waters provisions described within the permit control measures.

Plan Amendments

Simsbury will amend the SMP whenever:

- (1) there is a change which has the potential to cause pollution of the waters of the state; or
- (2) the actions required by the Plan fail to prevent pollution of the waters of the state or fail to otherwise comply with any other provision of this general permit; or
- (3) the Commissioner requests modification of the Plan.

Stormwater Management Plan Signature

"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."

_____	<u>First Selectwoman</u>	_____
Chief Elected Official/ Principal Executive Officer	Title	Date

_____	<u>Project Engineer</u>	_____
Principal plan preparer	Title	Date

Stormwater Management Plan Engineering Certification

"I hereby certify that I am making this certification in connection with a registration under the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems, submitted to the Commissioner by Lisa L. Heavner, First Selectwoman, for an activity located at or within Town of Simsbury and that all terms and conditions of the general permit are being met for all discharges which have been created, initiated or maintained and such activity is eligible for authorization under such permit. I further certify that a system is in place to ensure that all terms and conditions of this general permit will continue to be met for all discharges authorized by this general permit at the site. I certify that I have personally examined and am familiar with the information that provides the basis for this certification, including but not limited to all information described in Section 3(b)(8)(A) of such general permit, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining such information, that the information upon which this certification is based is true, accurate and complete to the best of my knowledge and belief. I certify that I have made an affirmative determination in accordance with Section 3(b)(8)(B) of this general permit. I understand that the registration filed in connection with such general permit is submitted in accordance with and shall comply with the requirements of Section 22a-430b of Connecticut General Statutes, as amended by Public Act 12-172. I also understand that knowingly making any false statement made in the submitted information and in this certification may be punishable as a criminal offense, including the possibility of fine and imprisonment, under section 53a-157b of the Connecticut General Statutes and any other applicable law."

Adam Kessler, PE

Name

Project Engineer

Title

Town of Simsbury

Company

Date