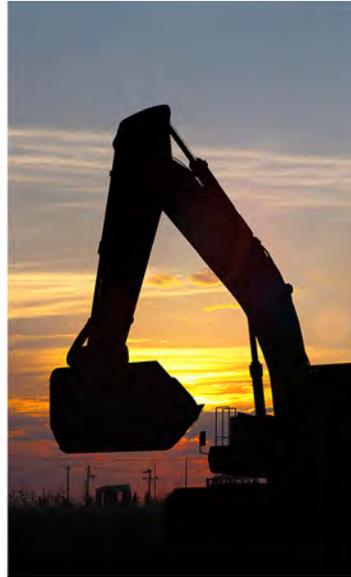




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Report

Stormwater Pollution Control Plan

Hawthorne Substation
180 Hawthorne Drive
Fairfield, CT 06825

Prepared for: The United Illuminating Company

Conestoga-Rovers & Associates

45 Farmington Valley Drive
Plainville, CT 06062

December 2014 • 086111 • Report No. 2



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Section 1.0 Certifications

Permittee

"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."

Richard J Reed
Name
Richard J Reed
Signature

VP-EPE
Title
12/15/14
Date

Document Preparer

"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."

Kyle L. Eckert, P.E.
Name
[Signature]
Signature

Engineer
Title
12/15/14
Date

Contractor

"I certify under penalty of law that I have read and understand the terms and conditions of the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. I understand that as a contractor or subcontractor at the site, I am authorized by this general permit, and must comply with the terms and conditions of this general permit, including, but not limited to the requirements of the Stormwater Pollution Control Plan prepared for the site."

David J. Koehler
Name
David J. Koehler
Signature

Associate Vice President
Title
December 15, 2014
Date

Contractor Information:

Black & Veatch
11401 Lamar Avenue
Overland Park, KS 66211

Site Location:

Hawthorne Substation
180 Hawthorne Drive
Fairfield, CT 06825

Professional Engineer

"I hereby certify that I am a professional engineer licensed in the State of Connecticut. I am making this certification in connection with a registration under such general permit, submitted to the commissioner by The United Illuminating Company for an activity located at 180 Hawthorne Drive, Fairfield, Connecticut. I certify that I have thoroughly and completely reviewed the Stormwater Pollution Control Plan for the project or activity covered by this certification. I further certify, based on such review and on the standard of care for such projects, that the Stormwater Pollution Control Plan has been prepared in accordance with the Connecticut Guidelines for the Soil Erosion and Sediment Control, as amended, the Stormwater Quality Manual, as amended, and the conditions of the general permit, and that the controls required for such Plan are appropriate for the site. I further 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 also understand that knowingly making any false statement in this certification may subject me to sanction by the Department and/or 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."

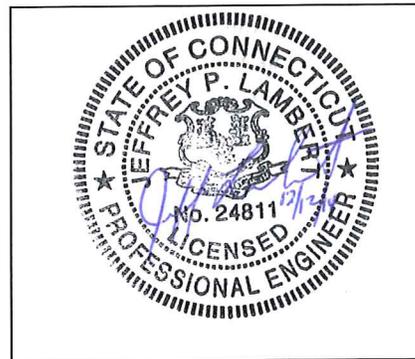
Jeff Lambert
Name

Project Engineer
Title

Jeff Lambert
Signature

12/12/2014
Date

45 Farmington Valley Dr.
Mailing Address Plainville, CT



Affix P.E. Stamp Here

Consultant Information

Conestoga-Rovers & Associates, a GHD Company
45 Farmington Valley Drive
Plainville, CT 06062
(860) 747-1800

Contacts:

Mr. Jeffrey Lambert
Ms. Kyle Eckert

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Section 2.0 Introduction

Conestoga-Rovers & Associates (CRA) has prepared this Stormwater Pollution Control Plan (SWPCP) for The United Illuminating Company (UI) for the Hawthorne Substation expansion project located at 180 Hawthorne Drive in Fairfield, Connecticut (Site). This SWPCP has been prepared in accordance with the State of Connecticut Department of Energy and Environmental Protection (CT DEEP) General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, effective October 1, 2013 (Permit) and the 2004 Connecticut Stormwater Quality Manual.

This SWPCP is designed to minimize potential pollution caused by soil erosion and sedimentation during and after construction, and potential stormwater pollution caused by use of the Site after construction is completed.

Section 3.0 Site and Project Description

3.1 Site Plan

Site drawings depicting drainage patterns, slopes, areas of soil disturbance, locations of non-structural controls and other pertinent information are included with this SWPCP (see **Figures 1, 2 and 3**).

3.2 Site Description

The Site is made up of UI's 115/13.8 kv bulk electrical substation. UI is making certain modifications and upgrades to the existing substation based on the load capacity need for the greater southwest Connecticut area (the Project). The anticipated area expected to be disturbed during the project is 1.41 acres with the Site area totalling 2.80 acres.

The south, northwest and west portion of the Site infiltrates into the wooded area around the substation, and east portion of the Site and paved driveway direct stormwater to a catchbasin on the paved driveway which drains to the City of Fairfield municipal storm sewer system via a catch basin located on Hawthorne Drive. The estimated runoff coefficient of the Site after construction activities are completed is 0.47 and there are no wetlands on the Site or within 500 feet.

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3.3 Construction Sequencing

The expected sequence of major construction activities and corresponding erosions and sediment controls include the following:

- Clear work area of vegetation – expected to begin in approximately March 2015
- Install silt fencing and hay bales as necessary
- Install sediment catch bag in down gradient catchbasin on Hawthorne Drive
- Subgrade regrading and preparation for new equipment
- Install permanent fencing
- Backfill and compact aggregate surfacing
- Expand asphalt driveway
- Remove temporary and silt fencing, and hay bales
- Site restoration and clean-up
- Demobilization – expected to be completed in approximately December 2015

This work is planned to be executed in phases, which will be beneficial to stormwater management; however the actual sequence may be altered based upon field conditions encountered and this SWPCP will be updated if and as necessary.

Complete installation of necessary stormwater controls downgradient of each phase of earth-disturbing activities will be achieved by the time each phase of earth-disturbing activities has begun, unless infeasible. Maintenance of temporary erosion and surface runoff controls includes adjustment and/or relations of controls will be conducted to be most effective, and removal of accumulated sediment from behind or within the controls will be conducted as needed. Regular maintenance activities will occur throughout the project as necessary until the Project is completed.

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Section 4.0 Best Management Practices (BMPs)

4.1 Minimum Design Considerations

UI will use good engineering practices and follow manufacturer's specifications in the design and installation of all BMPs used. The following factors should be accounted for when designing stormwater controls:

- The expected amount, frequency, intensity, and duration of precipitation and associated runoff
- The nature of stormwater runoff and run-on at the Site, including factors such as expected immediate flow from impervious surfaces, slopes and site drainage features (if any stormwater flow will be channelized at the Site, stormwater controls should be designed to control both peak flowrates and total stormwater volume to minimize erosion of outlets and to minimize downstream erosion)
- The potential for exposed soil to contain contaminants (highly unlikely at the Site)
- The range of soil particle sizes expected to be present on the Site

4.2 Erosion Control BMPs

The objective of sediment and erosion controls are to protect exposed, disturbed soil surfaces and to prevent sediment from being detached by precipitation or wind. Non-erodible cover is the primary erosion control practice and can include vegetation, temporary surface treatments or covers, or permanent covers such as pavement. Covers are efficient and economical methods of controlling sheet, rill, and raindrop impact erosion. While many of the BMPs described herein will be most applicable during regarding activities (whether making cuts or creating fills), some may also apply to soil exposed following pavement removal where stormwater has the potential to flow across the exposed soil. Important criteria for reducing erosive forces include:

1. Maintaining pavement and/or vegetative cover wherever possible and for as long as possible, and removing cover is sequenced states
2. Re-routing run-on flowing toward the exposed areas
3. Limiting availability and exposure of significant material (in particular, potentially erodible materials by providing temporary or permanent cover)
4. Performing Site work procedures in a manner that, to the extent practicable, considers weather conditions, Site characteristics, surface water flow pathways, and specific work task

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5. Establishing permanent cover, whether hard or soft, as soon as possible after disturbance
6. Where applicable, seeding with fast growing, native grasses and/or protecting exposed soil with mulch or other approved covers to provide temporary erosion control after Site work activities have concluded

Erosion and sedimentation control details for several common BMPs applicable to the Project are included on **Figure 4**. The following BMPs are designed to significantly reduce the contact of exposed soil at the Site with precipitation or wind and reduce the potential for associated adverse water quality impacts.

4.2.1 Preservation of Vegetated Areas and Topsoil Removal Considerations

Where feasible, preservation of areas currently covered with topsoil should be performed to the maximum extent possible to maintain erosion-resistant cover and reduce the quantity of high organic-containing materials that will have to be imported for Site stabilization following the completion of Site work activities. Where present and as required, existing vegetated topsoil shall be stripped from construction areas in a sequential manner according to the BMP criteria above. Removal of vegetation and topsoil shall be temporarily stockpiled in a suitable location and stabilized such that it will not erode, block drainage pathways, or interfere with the Site work, until it is transported for disposal.

Where required, topsoil shall be spread sequentially on exposed areas once Site work activities have been completed. The subsurface shall be frost-free and well graded prior to topsoil pavement. The surface of the newly placed topsoil shall be stabilized with mulch or rolled erosion control matting to facilitate new vegetation growth while protecting against erosion.

4.2.2 Minimize Soil Compaction

Site work during the Project should include the designation of areas that are to remain undisturbed due to their present or future value of regarding stormwater infiltration. In any areas of the Site where final vegetative stabilization will occur or where infiltration practices will be installed, UI shall either: 1) restrict vehicle and/or equipment use that might adversely alter the infiltration capabilities of the soil due to compaction; or 2) use soil conditioning techniques to maintain or restore infiltrative capacity of the soil for the duration of the Project.

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4.2.3 Surface Stabilization of Non- Paved Areas

For the purposed of this SWPCP the following types of activities will constitute the initiation of stabilization:

1. Prepping soil for vegetative or non-vegetative stabilization
2. Applying mulch or other non-vegetative product to the exposed areas
3. Seeding or planting the exposed area
4. Starting any of the above activities on a portion of the area to be stabilized, but not on the entire area
5. Finalizing arrangements to have stabilization product fully installed in compliance with the applicable deadline for completing stabilization

Where non-vegetative controls are being used to stabilize exposed portions of the Site or to temporarily protect areas that are being vegetatively stabilized, UI should provide effective non-vegetative cover materials. For temporary stabilization, examples of temporary non-vegetative stabilization methods include, but are not limited to: hydromulch and erosion control blankets. For final stabilization, examples of permanent non-vegetative stabilization methods include, but are not limited to: riprap, gabions, and geotextiles.

4.2.4 Seeding

Proper seeding is essential to encourage germination and fast growth. Proper seeding includes, but it not limited to:

- Applying permanent seeding to areas to be vegetated when no further disturbances are planned
- Applying permanent seeding before freezing weather is anticipated or to avoid arid conditions of the late summer
- Using seeds appropriate to the season and Site conditions
- Using a proper indigenous seed blend
- Adjusting pH and nutrient ratio of the soil if necessary
- Anchoring seed with straw mulch or wood chips and tracking using appropriate equipment with any grooves horizontal to slopes
- The use of indigenous or naturally-occurring grasses free of invasive species is recommended to establish a healthy stand of vegetation.

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Immediately after seeding or planting the area to be vegetatively stabilized, to the extent necessary to prevent erosion on the seeded or planted area, non-vegetative erosion controls such as mulch, rolled erosion control products, etc. should be placed over the area while vegetation is becoming established.

4.3 Sediment Control BMPs

Erosion controls discussed above in Section 4.2 are preventative measures intended to reduce the amount of soil that is transported by wind or precipitation. Sedimentation control is the last line of defense for off-Site transportation of sediment and can be considered a treatment technique. Because sedimentation is the product of erosion, proper sediment control must be used to encourage deposition of soil particles that have been transported by water or wind on Site. Sediment control devices must be designed to impound sediment-laden runoff for a certain retention time necessary to allow soil particles to fall out of suspension. It is important when implementing the BMPs listed below to consider their ability to retain and reduce the velocity of runoff rather than try to filter sediment from the runoff. Structures that are designed or installed to filter sediment will generally have the potential to fail during significant storm events and potentially worsen the transport of sediment off Site.

4.3.1 Drop Inlet Sediment Barriers

Sediment control will be implemented around storm drains located within 50 feet of work zones and in areas downstream from work zones that could potentially receive stormwater runoff from Site work activities. Due to the topography of the Site, the catch basin on the paved driveway to the substation will be the focal point for stormwater quality control. The existing municipal stormwater system for Hawthorne Drive conveys water direction to a surface water outfall without additional treatment other than downstream catch basin sumps.

This BMP allows for use of the storm drain system as long as sediment-laden runoff is ponded for a sufficient time to allow sediment to fall out of suspension or be sufficiently filtered to remove suspended solids before entering the storm drain. Typical types of drop inlet sediment barriers include stone and filter fabric barriers or filter tubes barriers. Drop inlet filters specified for this project include a geotextile filter bag (silt sack) insert installed beneath the catch basin grate (as indicated on **Figure 4**), as well as surrounding the receiving catch basin with hay bales (**Figure 4**). The specified inlet protection device shall be used and properly maintained to protect storm drains that receive runoff from the Site that is potentially affected by Site work activity. Additional inlet protection measures may be used in combination with the specified device, as applicable.

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4.3.2 Silt Fence and Hay/Straw Bales

Silt fence may be used within exposed soil areas following pavement removal to aid in runoff control and treatment in certain locations. If used, silt fence will be considered a temporary sediment control structure consisting of semi-permeable filter fabric (sometimes with a wire support net) entrenched into soil and attached to supporting stakes. The fencing shall consist of woven polypropylene with stabilizers or inhibitors or both to make the filaments resistant to deterioration resulting from exposure to sunlight or heat. Hay or straw bales may also be used in conjunction with silt fence to provide additional support and be installed as indicated on **Figure 4**.

Silt fence shall be installed downgradient of disturbed work areas to treat the potential of excessive flow runoff during Site work. The fence installation shall be designed to cause ponding to occur on the upgradient side of the silt fence during a precipitation event, which will encourage infiltration and provide retention time for sediment to fall from suspension. In addition, silt fencing may be installed off-contour to divert potential run-on flows from discharging into excavations or through disturbed areas and to concentrate flows to runoff control structures. Silt fence and hay/straw bale use should meet the following requirements:

- The silt fence installed will be prefabricated with wooden posts
- The bottom edge of the fabric shall be buried at least 6 inches, and the anchoring soil shall be well compacted to prevent short-circuiting of runoff underneath the silt fence
- The silt fence will be installed in such a way as to prevent runoff from passing over, under, or around the fence and in such a way that runoff passes through the silt fence
- The maximum slope upgradient of the silt fence shall be 2:1
- Fencing shall be placed on-contour to be most effective in sediment control applications
- Silt fence shall be arranged in a configuration so that the ends are turned uphill, unless otherwise approved
- Silt fence shall be placed at least 2 feet away from the toe of a slope to increase ponding volume
- Ponding height behind the silt fence shall not exceed 18 inches
- Hay/straw bales will have minimum approximate dimensions of 36 inches long by 18 inches wide by 24 inches high
- Each bale will be secured to the ground surface with two 2"x2"x3.5" hardwood stakes when used in conjunction with silt fence, or otherwise suitably weighted to make them immobile to water
- Hay/straw bales will be installed so the edges are in contact with adjacent bales, with any spaces between bales being filled with additional bale material

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Silt fence and hay/straw bales will be installed prior to, or concurrent with, clearing and grubbing activities to provide initial sediment control. Silt fence shall be adjusted to accommodate changing Site conditions and should always be positioned between Site work areas and adjacent sensitive areas or stormwater control structures. Silt fence and hay/straw bale barriers can also be used to control runoff from stockpiles on Site, if needed.

4.4 Sediment and Erosion Control BMP Maintenance

Top Soil Preservation

Stabilization of the topsoil after placement on exposed surfaces and repair of existing vegetated areas not designated for disturbance are necessary to prevent off-Site migration of soil particles. Until a fair stand of grass is present, topsoil covered areas shall be inspected regularly and after every significant rain event. Based on certain inspection criteria additional erosion control measures may be necessary to promote proper stabilization. These additional measures will be on a case by case basis.

Soil Compaction

If vehicle or equipment use is observed to adversely compact surface conditions in vegetated areas (or areas to be vegetated), signs, retraining, or barriers should be employed to alter the traffic patterns to preserve soil character. Where areas are observed to have been compacted that were designated for infiltration and/or new vegetation, they should be conditioned by rototilling, tining, or other practices designed to loosen the

Seeding

Seeded areas shall be inspected for evidence of erosive forces including splash erosion, rilling, or channeling. Stabilization methods shall be reestablished to prevent further damage to exposed areas.

Drop Inlet Sediment Barriers

Frequent maintenance of the silt sack devices is required as they have the potential to clog quickly due to their filtering function. Maintenance activities should include inspecting the devices after each rain event and removing sediment and/or replacing geotextile, and also replacing surrounding filter systems (i.e., filter tubes or stone filter socks) to maintain their effectiveness. These devices should be installed only when resulting ponding water will not encroach onto roadways or erodible slopes.

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Silt Fence

Silt fence shall be inspected regularly and after every significant storm event. Damaged silt fence shall be repaired immediately. Accumulated sediment should be removed from behind the upgradient side when sediment reaches one-third the silt fence height. Silt fencing has a useful life of one year. Replace silt fencing as required to maintain efficiency. Remove silt fence once slopes have been adequately stabilized and all permanent erosion and runoff control structures have been completed.

Section 5.0 Stormwater Control Measures

5.1 Erosion and Sediment Control

5.1.1 Soil Stabilization and Protection

Stockpiles

Construction of temporary stockpiles may be necessary during the project when soil or aggregate from an off-Site source is delivered or when soil excavated from on-Site areas requires temporary relocation. The location of the stockpile(s) will vary depending upon the work being performed and duration of the storage, but a designated area is indicated on **Figure 2**. Stockpiles should be established outside of any flow pathways and physically separated from other stormwater controls implemented. Stockpiling of the soil or aggregate at the Site will be task-specific, but will be maintained to minimize impacts to stormwater by utilizing, at a minimum, hay bales, perimeter silt fence, or compost wattles (filter tubes). Temporary covers (i.e., plastic sheeting, tarps, erosion control matting, or loam/seed/mulch) should also be used to isolate the stockpiles from erosive forces caused by significant precipitation. Stockpile stabilization measures will be initiated when stockpile activities have permanently ceased on any portion of the Site, or temporarily ceased on any portion of the Site, and will not resume for a period exceeding 14 calendar days.

If needed, sheeting used to cover stockpiles will be strong enough for the intended function of the cover. At a minimum, polyethylene sheeting of at least 6-mil thickness will be used over stockpiled soil materials. Multiple sheets used to cover a stockpile should overlap and be anchored by a suitable weight sufficient to maintain the security and integrity of the cover for the duration of its use. Stockpiles may be underlain by sheeting, depending on the nature of the materials being placed in the stockpile.

Disturbed Areas

Where existing vegetation is removed and soil is exposed, UI will use procedures intended to minimize erosions susceptibility of the materials. These procedures will include compaction

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and smooth grading (or rolling) of exposed materials to shed precipitation, and/or grading materials in a manner that lessens the potential adverse effects of runoff and minimizes the creation of sediment-laden overland flow that could enter nearby drainage systems. Exposed soil materials will be stabilized to the best of the contractors capabilities within 7 calendar days whenever any clearing, grading, excavating or other earth disturbing activities have permanently ceased on any portion of the Site. Exposed areas that will remain disturbed beyond the seeding season will have long-term non-vegetative stabilization implemented. A follow up inspection will occur during the next growing season to confirm stabilization.

Another option of stabilizing these disturbs areas is the placement of stone, gravel, or other less-erodible material on the ground surface on or around excavations and soil placement areas to limit stormwater contact with disturbed soil. Temporary stabilization may also include the use of temporary covers such as tarps to shed water from exposed soil. In general, the installation of permanent ground covers (i.e., asphalt pavement, or loam and seed) over disturbed areas is expected to occur such that time of exposure of disturbed areas to the elements is minimized.

Work is anticipated to be localized and straightforward to control with regard to stormwater quality issues. Sediment and erosion control practices will also be localized and adapted to the Site-specific conditions where erosion or deposition of sediment into a drainage structure could potentially occur.

5.1.2 Structural Measures

UI does not intend to use structure measures to divert flows away from the Site.

5.1.3 Maintenance

All sediment and erosion controls installed during the project will remain operational and to the best of the contractors capabilities be protected from activities that reduce their effectiveness throughout the duration of coverage under the Permit. UI's consultant will inspect all pollutant-generating activities and sediment and erosion controls to document conditions observed and respond appropriately to findings. If sediment and erosion controls need to be replaced, repaired or maintained, UI will:

1. For any repairs to sediment and erosion controls UI's contractor will initiate work to fix the issue immediately after discovering the problem, and complete such work by the close of the next work day

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2. Where these actions result in changes (corrective actions) to any of the pollutant prevention controls or procedures documented in the SWPCP, UI will modify the SWPCP accordingly within 7 calendar days of completing this work.

5.2 Dewatering Wastewaters

Significant excavation and trenching below the ground water is not expected to occur for the Project and therefore, significant dewatering activities are not anticipated. However, if dewatering becomes necessary, the dewatering wastewaters will be discharged in a manner as not to cause scouring or erosion, or contains suspended solids in amounts that could be reasonably expected to cause pollution to surface waters. Dewatering wastewaters will not be discharged without a valid permit.

5.3 Post-Construction Stormwater Management

The Permit requires the design of the Site redevelopment to incorporate control measures that are technologically available, economically practicable and achievable in light of best industry practice to retain stormwater for the Water Quality Volume (WQV), as calculated. If this volume is not able to be retained on Site, the design shall retain the largest volume possible using available control measures.

The WQV is a factor of the size of the Site, percent imperviousness and the standard of a 1-inch rainfall amount. The current Site is developed with a 31 percent effective impervious cover, with a minimal increase of 4 percent post-development.

UI considered several runoff and Low Impact Design (LID) control measures such as rain gardens, detention and retention basins, and bioretention basins; however, Site constraints prevented the use of these features in the final design. UI's property is surrounded by mostly vegetated private property (residential and commercial) and the footprint of the existing substation and the new proposed addition comprise the vast majority of the available land. Additionally, the post-development runoff characteristics will not differ significantly from the pre-development conditions.

To retain the maximum volume of stormwater, UI is finishing the expanded portion of the substation with a pervious cover of crushed rock. UI is also removing a portion of the existing substation asphalt cover and minimally increasing the footprint of the existing asphalt driveway to accommodate emergency power generation if necessary. Stormwater flow from the majority of the Site is by naturally occurring runoff to adjacent pervious surfaces with subsequent infiltration. Runoff from the paved asphalt driveway is via sheet flow to adjacent pervious surfaces or to the municipal storm sewer system on Hawthorne Drive.

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5.4 Post-Construction Control Measures

5.4.1 Runoff Reduction and Low Impact Development (LID) Practices

Due to the Site constraints described above in Section 5.3, UI is unable to incorporate LID practices within the design of the redevelopment, however UI is minimally increasing the percent impervious cover (4 percent). The Site design promotes stormwater infiltration and sheet flow of runoff to pervious surfaces to promote recharge of groundwater.

5.4.2 Suspended Solids and Floatables Removal

Suspended solids and floatables (i.e., oil and grease, other floatable liquids, floatable trash, etc.) are not expected to be present in the runoff from the paved driveway. Trash and oil staining on the paved drive will be removed during routine inspections and by practicing good housekeeping after construction is complete. Post-construction design includes all disturbed areas to be seeded, and covered with gravel or asphalt which will reduce suspended solids in the stormwater discharge.

5.4.3 Velocity Dissipation

Velocity dissipation devices are not expected to be necessary in the post-construction design at the discharge location at the catchbasin on the driveway. The driveway is paved with a concrete retaining way along a portion, therefore there will be no natural physical or biological characteristics to maintain and/or protect from velocity flow waters.

5.5 Other Controls

5.5.1 Waste Disposal

Litter, debris, building materials or other domestic and construction waste will be placed in appropriate containers that prevent release and properly disposed of off Site or segregated and properly reused. Portable toilets containing sanitary wastes will be secured to prevent them from being tipped over. Routine inspections and good housekeeping measures will minimize the potential of a release of waste to surface water.

5.5.2 Washout Areas

UI will construct a wheel washout station at the construction entrance and exit of the Site vehicle access point (paved driveway) and an additional self-contained washout station adjacent to the construction activities for the washout of applicators, containers and equipment. All washwaters will be contained such that no overflow will occur during a rainfall

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event. The washout stations will be inspected at least once per week to ensure structural integrity, adequate holding capacity and to check for leaks or overflows. If a deficiency is noted, the washout station will be repaired prior to further use.

5.5.3 Off-Site Vehicle Tracking

UI will minimize the off-Site vehicle tracking of sediments and the generation of dust by using wet dust control measures. The volume of water sprayed for controlling dust will be used in quantities as not to cause runoff. UI will not discharge dust control water if a visible oil sheen, floating solids, visible discoloration or foaming of the receiving catchbasin is observed. UI will also, to the extent practicable, to minimize the surface area of the exposed/disturbed areas and also the length of time of exposure to limit dust generation potential.

Section 6.0 Inspections

Initial Inspection

Within the first 30 days of commencement of construction activity at the Site, a qualified soil erosion and sediment control professional (QSESCP) or a qualified professional engineer (QPE) to inspect the Site at least once but no more than three times during the first 90 days to confirm compliance with the Permit and proper implementation of sediment and erosion control measures. The QSESCP or QPE cannot be an employee of UI as defined by the International Revenue Service (IRS) in IRS Code of 1986 and have no ownership interest in the project. Documentation of the qualifications of the QSESCP or QPE and the results of the inspections shall be kept in **Appendix A**.

Routine Inspections

UI's consultant will properly install and maintain a rain gauge on-Site to document rainfall amounts. Once per week and within 24 hours of the end of a storm that generates a discharge, UI will inspect the following areas (at a minimum) for evidence of pollutants entering the drainage system:

1. Disturbed areas of the construction activity that have not been finally stabilized
2. All structural control measures at the Site
3. Soil stockpile areas
4. Washout areas and locations where vehicles enter or exit the Site
5. Erosion and sediment controls at the Site
6. Areas of stabilization

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Locations where vehicles enter or exit the Site will also be inspected for evidence of off-Site sediment tracking. For storms that end of a holiday, weekend or other time after which normal working hours will not commence with 24 hours, an inspection will be performed within 24 hours only for storms that exceed 0.5 inches. For storms less than 0.5 inches, UI will inspect the Site immediately upon the start of the subsequent normal working hours.

When the Site has been temporarily or finally stabilized, inspections will be conducted at least once every month. UI's consultant will continue inspecting the Site until a Notice of Termination is submitted to the CT DEEP. The inspection form is included as **Appendix B**.

Section 7.0 Monitoring

UI's consultant will sample the stormwater discharge runoff from the Site on a monthly basis for turbidity, until final stabilization of the drainage area associated with the Site is achieved. Sampling should occur during normal working hours and if it is discontinued due to the end of normal working hours, UI's consultant will resume sampling the following morning (or following work day) as long as discharge continues. Sampling should be discontinued in hazardous weather conditions. If no discharge occurs during the month, sampling is not required.

A sample will be collected from a storm event that occurs at least 24 hours after the previous storm event generating a stormwater discharge. Samples will be grab samples taken at least three times during the storm event. The first sample will be taken within the first hour of stormwater discharge from the Site. If discharge begins outside of normal working hours, the first sample will be taken at the start of normal working hours.

The sample location is the catchbasin located along the paved driveway that connects the substation to Hawthorne Drive as identified on **Figure 3**. This catchbasin collects stormwater runoff from the north portion of the Site and the paved drive. The remainder of the site drains by sheet flow runoff and/or infiltration. Samples will be analyzed for turbidity by 40 CFR Part 136.

Reporting

The turbidity value for the sampling point will be reported on a Stormwater Monitoring Report (SMR) within 30 days following the end of the each month. Turbidity value is determined by averaging the results of all the grab samples collected (minimum of three). If there was no discharge during the month or sampling was suspended or limited due to hazardous conditions, it will be indicated on the SMR.

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The SMR can be submitted to CT DEEP electronically via NetDMR or mailed directly to:

Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division (Attn: DMR Processing)
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

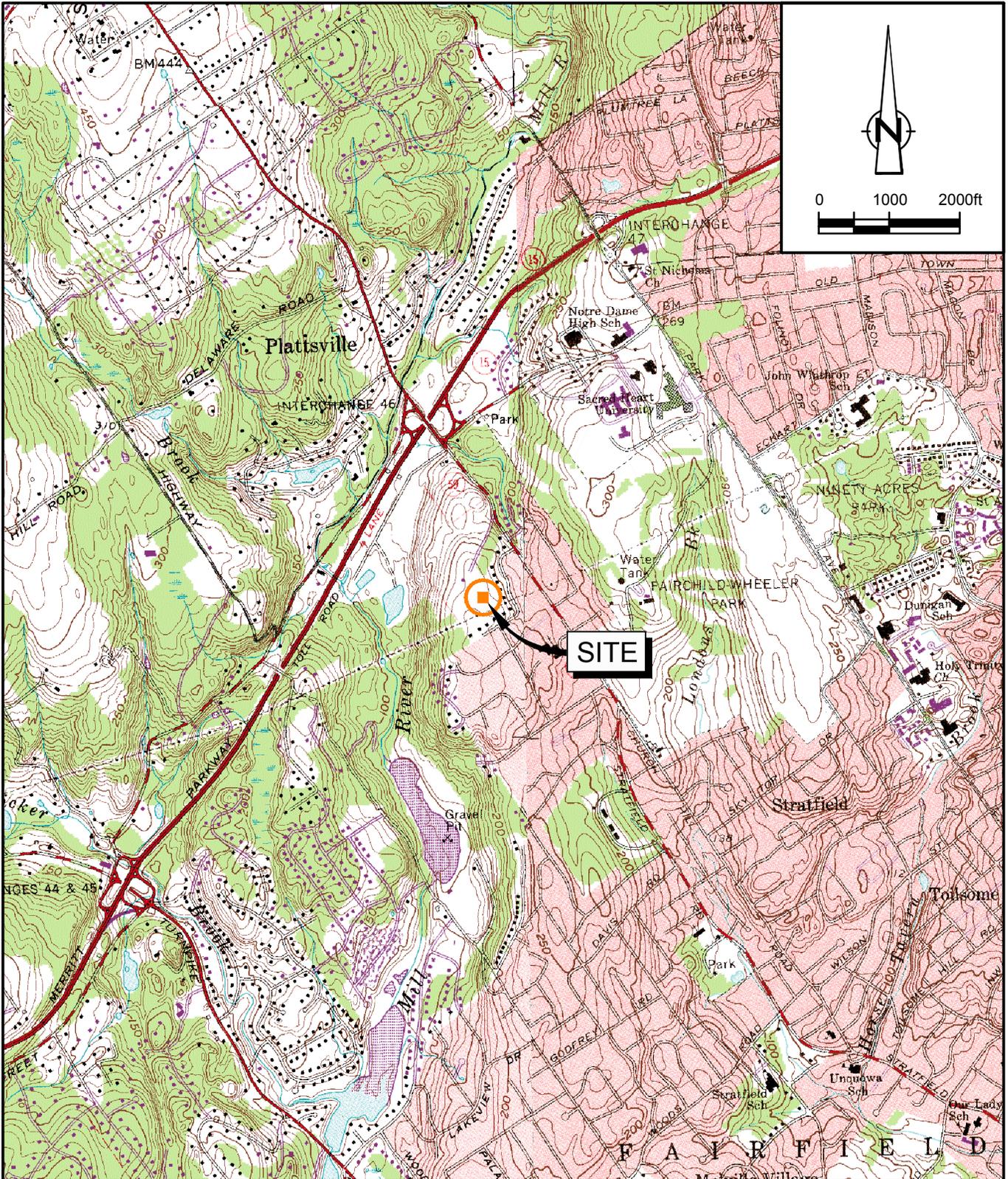
Note, to submit paper SMRs, an Opt-Out Request must be submitted to CT DEEP. Information on registering for NetDMR or submitting Opt-Out Requests is found in the Permit. A copy of a blank SMR is located in **Appendix C** or at www.ct.gov/deep/stormwater.

Section 8.0 Plan Amendments

UI and its consultant will amend the SWPCP if there is a change in contractors or subcontractors at the Site, or a change in design, construction, operation or maintenance at the Site which has the potential for the discharge of pollutants as a result of stormwater runoff. UI and its consultant will also amend the SWPCP if control measures utilized at the Site fail to prevent stormwater runoff pollution.

The CT DEEP may notify UI at any time that the SWPCP and/or Site does not meet the requirements of the permit, and UI will be required to modify the plan within 7 days to address the concerns of CT DEEP. Within 15 days, UI will submit a written certification that the requested changes have been made to the SWPCP and implemented at the Site.

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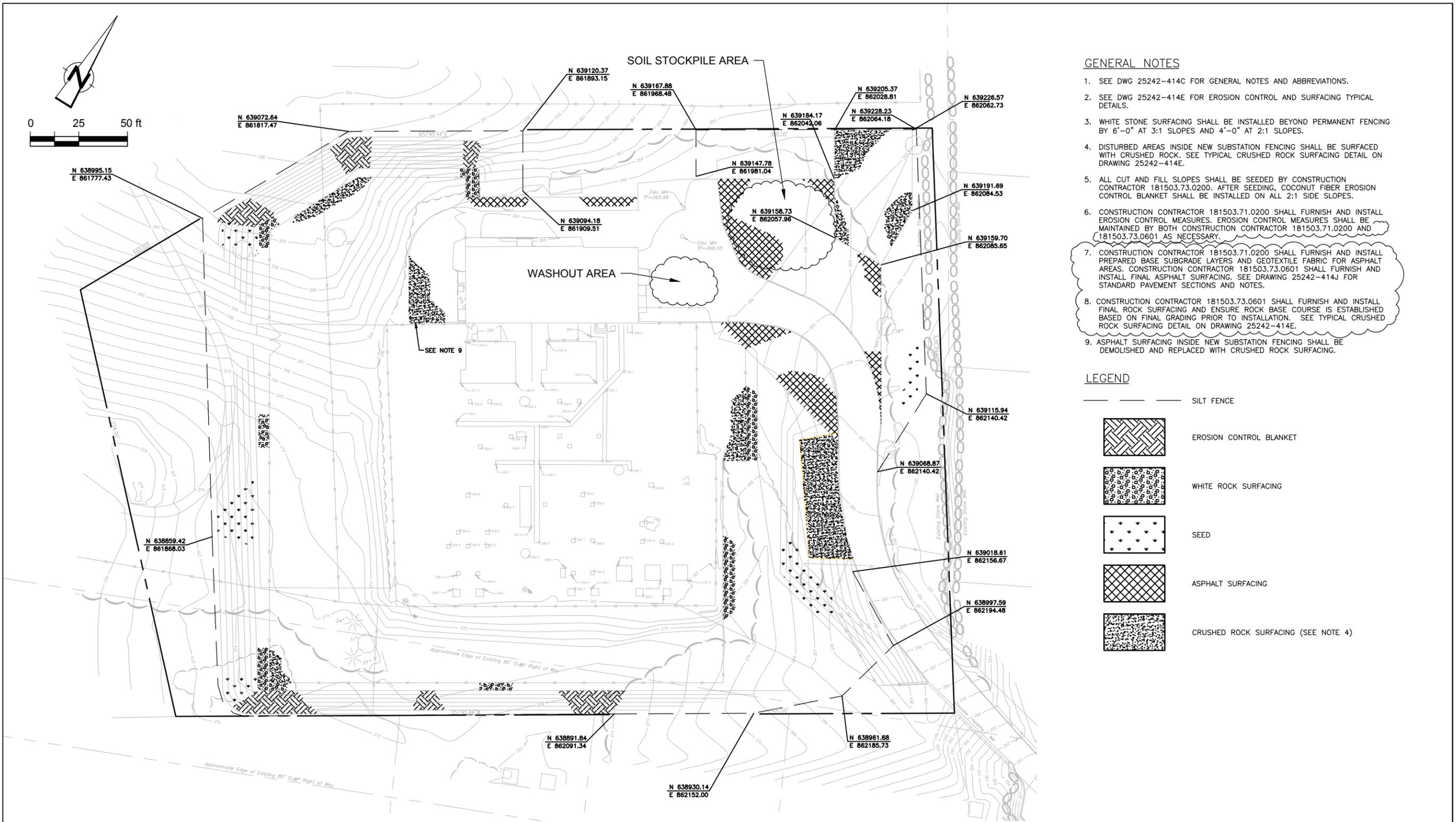
SOURCE: USGS QUADRANGLE MAPS;
BRIDGEPORT AND WESTPORT, CONNECTICUT

figure 1

SITE LOCATION
STORMWATER POLLUTION CONTROL PLAN
180 HAWTHORNE DRIVE
Fairfield, Connecticut



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GENERAL NOTES

- SEE DWG 25242-414C FOR GENERAL NOTES AND ABBREVIATIONS.
- SEE DWG 25242-414E FOR EROSION CONTROL AND SURFACING TYPICAL DETAILS.
- WHITE STONE SURFACING SHALL BE INSTALLED BEYOND PERMANENT FENCING BY 6'-0" AT 3:1 SLOPES AND 4'-0" AT 2:1 SLOPES.
- DISTURBED AREAS INSIDE NEW SUBSTATION FENCING SHALL BE SURFACED WITH CRUSHED ROCK. SEE TYPICAL CRUSHED ROCK SURFACING DETAIL ON DRAWING 25242-414E.
- ALL CUT AND FILL SLOPES SHALL BE SEED BY CONSTRUCTION CONTRACTOR 181503.73.0200. AFTER SEEDING, COCONUT FIBER EROSION CONTROL BLANKET SHALL BE INSTALLED ON ALL 2:1 SIDE SLOPES.
- CONSTRUCTION CONTRACTOR 181503.73.0200 SHALL FURNISH AND INSTALL EROSION CONTROL MEASURES. EROSION CONTROL MEASURES SHALL BE MAINTAINED BY BOTH CONSTRUCTION CONTRACTOR 181503.71.0200 AND 181503.73.0601 AS NECESSARY.
- CONSTRUCTION CONTRACTOR 181503.71.0200 SHALL FURNISH AND INSTALL PREPARED BASE SUBGRADE LAYERS AND GEOTEXTILE FABRIC FOR ASPHALT AREAS. CONSTRUCTION CONTRACTOR 181503.73.0601 SHALL FURNISH AND INSTALL FINAL ASPHALT SURFACING. SEE DRAWING 25242-414J FOR STANDARD PAVEMENT SECTIONS AND NOTES.
- CONSTRUCTION CONTRACTOR 181503.73.0601 SHALL FURNISH AND INSTALL FINAL ROCK SURFACING AND ENSURE ROCK BASE COURSE IS ESTABLISHED BASED ON FINAL GRADING PRIOR TO INSTALLATION. SEE TYPICAL CRUSHED ROCK SURFACING DETAIL ON DRAWING 25242-414E.
- ASPHALT SURFACING INSIDE NEW SUBSTATION FENCING SHALL BE DEMOLISHED AND REPLACED WITH CRUSHED ROCK SURFACING.

LEGEND

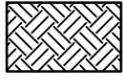
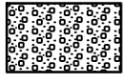
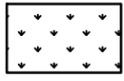
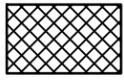
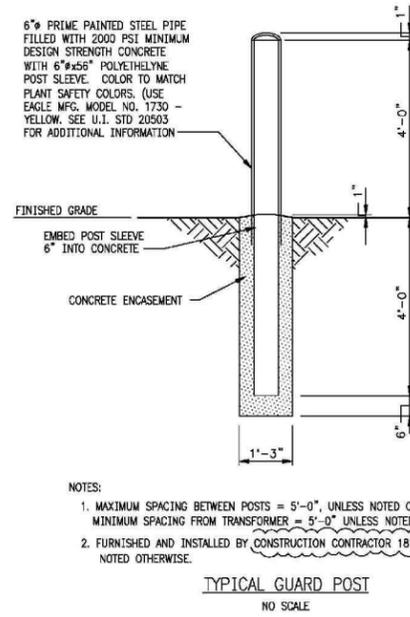
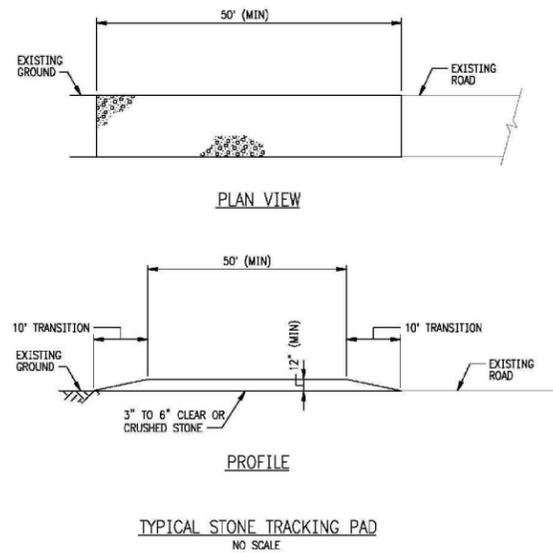
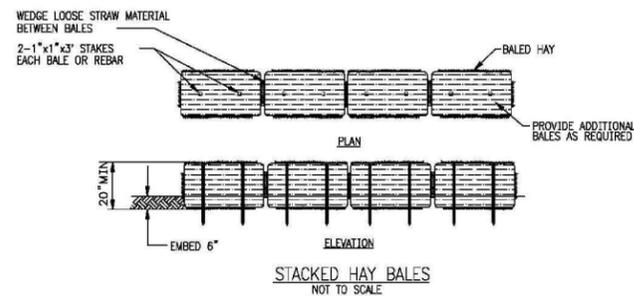
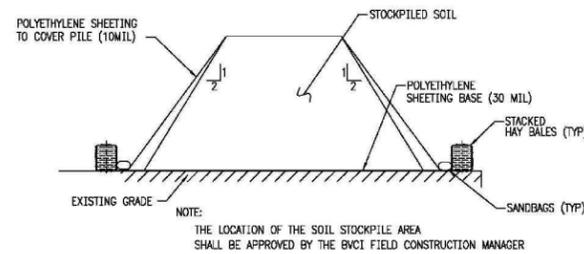
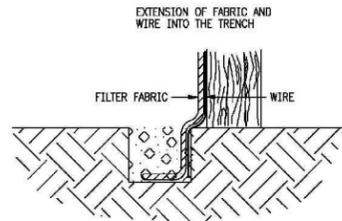
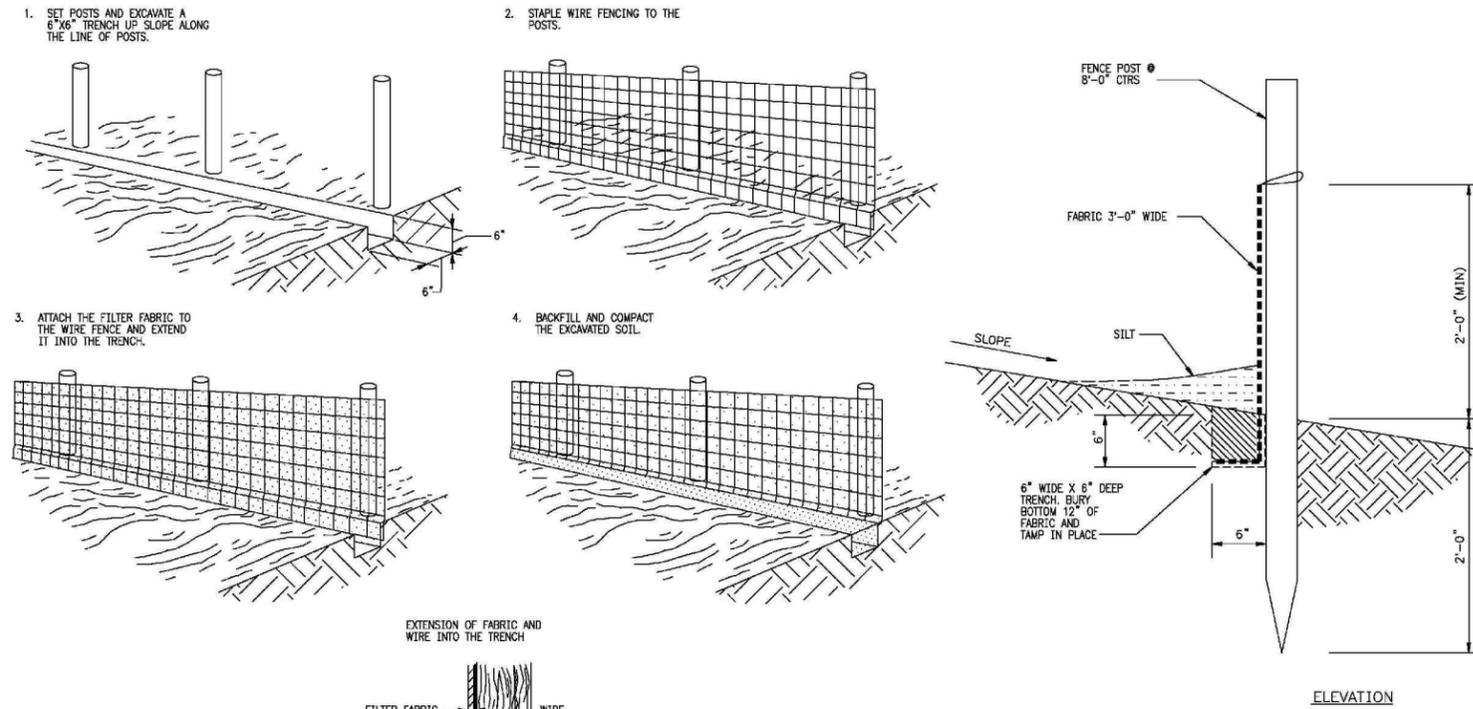
-  SILT FENCE
-  EROSION CONTROL BLANKET
-  WHITE ROCK SURFACING
-  SEED
-  ASPHALT SURFACING
-  CRUSHED ROCK SURFACING (SEE NOTE 4)

figure 2
SITE PLAN
STORMWATER POLLUTION CONTROL PLAN
180 HAWTHORNE DRIVE
Fairfield, Connecticut

SOURCE: BLACK & VEATCH,
 EROSION CONTROL AND SURFACING - SITE, PLAN,
 HAWTHORNE SUBSTATION, DWG. No. 25242-414D,
 12/03/2014.





NOTES

- TRACKING PAD SHALL BE INSTALLED PRIOR TO ANY TRAFFIC LEAVING SITE. TRACKING PAD SHALL BE FULL WIDTH OF ROAD OR EGRESS POINT. A MINIMUM 12" THICK PAD SHALL BE MAINTAINED.
- DESIGN CRITERIA FOR TRACKING PAD.
 - WIDTH - NOT LESS THAN FULL WIDTH OF POINTS OF INGRESS OR EGRESS.
 - LENGTH - 50 FEET MINIMUM WHERE THE SOILS ARE SANDS OR GRAVEL OR 100 FEET MINIMUM WHERE SOILS ARE CLAYS OR SILTS, EXCEPT WHERE THE TRAVELED LENGTH IS LESS THAN 50 OR 100 FEET RESPECTIVELY. THESE LENGTHS MAY BE INCREASED WHERE FIELD CONDITIONS DICTATE.
 - FILTER CLOTH - SHALL BE PLACED OVER ENTIRE AREA PRIOR TO PLACING OF STONE AND SHALL BE MIRAFI 500X OR EQUIVALENT.
 - MAINTENANCE - THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION WHICH WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ON TO PUBLIC RIGHT-OF-WAY THIS MAY REQUIRE PERIODIC TOP DRESSING WITH ADDITIONAL STONE OR ADDITIONAL LENGTH AS CONDITIONS DEMAND AND REPAIR AND/OR CLEANOUT OF ANY MEASURES USED TO TRAP SEDIMENT. ALL SEDIMENT SPILLED, DROPPED, WASHED OR TRACKED ONTO PUBLIC RIGHT-OF-WAY MUST BE REMOVED IMMEDIATELY.
- THE SURFACE COURSE SHALL BE CRUSHER RUN TRAP ROCK UNIFORMLY GRADED FROM 3/4" TO CRUSHER FINES. WHITE ROCK SHALL BE USED FOR SURFACE COURSE WHERE REFERRED TO ON DRAWINGS. SURFACE COURSE SHALL BE FURNISHED AND INSTALLED BY CONSTRUCTION CONTRACTOR 181503.73.0601.
- THE BASE COURSE SHALL BE TRAP ROCK THAT PASSES A 1 1/2" SIEVE AND IS RETAINED ON A 1" SIEVE. BASE COURSE SHALL BE FURNISHED AND INSTALLED BY CONSTRUCTION CONTRACTOR 181503.71.0200.
- FIELD ADJUST TIE-IN TO EXISTING ROAD.
- ALL WORK SHOWN ON THIS DRAWING SHALL BE FURNISHED AND INSTALLED BY CONSTRUCTION CONTRACTOR 181503.71.0200, UNLESS NOTED OTHERWISE.



figure 4
TYPICAL DETAILS
STORMWATER POLLUTION CONTROL PLAN
180 HAWTHORNE DRIVE
Fairfield, Connecticut



SOURCE: BLACK & VEATCH,
EROSION CONTROL AND SURFACING - SITE,
TYPICAL DETAILS, HAWTHORNE SUBSTATION,
DWG. No. 25242-414E, 12/03/2014.

Appendix A

**QPE Documentation
Initial Inspections**

TOF-3-C

EDUCATION

M.B.A. Wayne State University, 2001

B.S.E. Civil and Environmental Engineering, University of Michigan, 1998

EMPLOYMENT HISTORY

1997- Associate

Present Conestoga-Rovers & Associates, Plainville, CT
Named CRA Associate, 2007

PROFESSIONAL REGISTRATIONS/AFFILIATIONS

Licensed Professional Engineer (Civil): Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, Michigan

Licensed Environmental Professional: Connecticut

Licensed Site Professional: Massachusetts

PROFILE OF PROFESSIONAL ACTIVITIES

- Project manager/project coordinator for multi-disciplinary projects for clients and sites throughout the United States. Experience and expertise includes the following areas:
 - Regulatory compliance evaluations, including multi-media permitting
 - Environmental investigations, including Underground Storage Tank Management, Resource Conservation and Recovery Act (RCRA), Superfund, and Toxic Substances Control Act (TSCA)
 - Hydrogeologic and remedial program design and implementation
 - Various field activities including soil boring/monitoring well installation, air, soil, sediment, and groundwater, and free-product sampling, and construction oversight
 - Various document and technical report preparation, including work plans, contract documents, and health and safety plans
 - Liaison with local, state, and federal agencies
 - Data management and analysis, including statistical analysis

Environmental Site Assessment, Investigation, and Remediation

- Licensed Environmental Professional of record for an establishment subject to the Connecticut Transfer Act located in Waterbury, Connecticut. Major activities included Phase I, Phase II/ Phase III investigation, coordinating with CTDEEP, and evaluating remedial alternatives to comply with the RSRs.
- Licensed Site Professional of record for Disposal Site located in Westwood, Massachusetts subject to the Massachusetts Contingency Plan (MCP). Major activities included Release Abatement Measures consisting of excavation and in-situ chemical injection to enhance Monitored Natural Attenuation (MNA) of petroleum related residual impacts.

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- Project manager responsible for an establishment subject to the Connecticut Transfer Act located in Bristol, Connecticut. Major activities included Phase II and Phase III investigation involving underground storage tanks (USTs), hydraulic lifts, and dry cleaning operations, evaluating remedial alternatives to comply with the Remediation Standard Regulations (RSRs), and implementing remedial activities including soil vapor extraction.
- Project manager responsible for providing Licensed Site Professional third party review for seller during property transaction in Framingham, MA.
- Project manager responsible for over 50 sites located in Connecticut, Massachusetts, New Hampshire, New Jersey, and New York for major oil company involved with all aspects the investigative and/or remedial activities associated with releases from USTs including fate/transport modeling, remediation system operation and maintenance, and chemical injection.
- Project manager responsible for conducting due diligence investigation activities associated with releases from USTs at over 60 sites located in Maryland for major oil company prior to divestiture.
- Project manager responsible for providing transfer act consulting to a buyer of an establishment subject to the Connecticut Transfer Act located in West Hartford, Connecticut. Major activities included review of previous investigation and remediation activities to determine compliance with the Transfer Act and provide estimate of future liabilities.
- Project manager responsible for an establishment subject to the Connecticut Transfer Act located in Manchester, Connecticut. Major activities included Phase I Site Assessment and development/implementation of Phase II scope of work to comply with the RSRs.
- Project manager responsible for a commercial property in Middletown, Connecticut. Major activities included site investigation and remediation activities in substantial compliance with the RSRs, including application of Fenton's Reagent via a special permit.
- Project manager responsible for operation of a 100 gallon per minute (gpm) groundwater and non-aqueous phase liquid (NAPL) extraction and treatment system at a former manufactured gas plant in Bridgeport, Connecticut. Major activities included operation and maintenance of the extraction and treatment system and engineered variance request for soil compliance.
- Subsurface evaluator for an automotive dealership located in Green Brook, New Jersey. Major activities included the investigative and/or remedial activities associated with releases from USTs including vapor intrusion, non-aqueous phase liquids, and ecological risk.
- Project coordinator for removal action conducted under acre Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for free-phase, polychlorinated biphenyl (PCB)-impacted waste oil located in Bristol, Connecticut. Major activities included site investigation, remedial design preparation and implementation, UST management, excavation and disposal, free-product recovery system installation, and community relations.
- Project manager responsible for project subject to the Massachusetts Contingency Plan (MCP) located in Springfield, Massachusetts. Major activities included the evaluation of emergency response actions conducted following a petroleum release, investigative and/or remedial activities, and closure.
- Project manager responsible for implementation of a hydrogeologic investigation at Three Mile Island nuclear generating plant located in Middletown, Pennsylvania. Major activities included development of scope of work, identification of areas requiring further evaluation, management and coordination of drilling and sampling activities, evaluation of radionuclide analytical data, and development of a conceptual model.
- Project manager responsible for implementation of a hydrogeologic investigation at San Onofre, FitzPatrick, Vermont Yankee, and Pilgrim nuclear generating stations located in California, New

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York, Vermont, and Massachusetts, respectively. Major activities included management and coordination of drilling and activities and development of conceptual site models.

- Project manager responsible for updating Resource Conservation and Recovery Act (RCRA) Closure Plan for IBM facility located in Essex Junction, Vermont.
- Certifying engineer responsible for RCRA Closure of a hazardous waste storage area at a facility located in Naugatuck, Connecticut.
- Project manager responsible for a 12-acre CERCLA 103C Landfill located in Walker, Michigan. Major activities included Remedial Investigation (RI) implementation, Interim Response Work Plan negotiation and preparation, and redevelopment support during brownfield property transaction.
- Project manager responsible for 28-acre and 8-acre property redevelopment located in Rochester Hills, Michigan. Major activities included Phase I/Phase II Environmental Site Assessments (ESAs), and Building Decommissioning Assessments (BDA) including asbestos containing material (ACM) survey, and redevelopment support.
- Project manager responsible for final plume delineation via vertical aquifer sampling and subsequent annual groundwater monitoring in support of monitored natural attenuation for a chlorinated solvent plume located in Kalkaska, Michigan.
- Project coordinator for Superfund landfill located in Lapeer County, Michigan. Major activities included impacted soil relocation [primarily volatile organic compounds (VOCs) and PCBs], landfill cap construction and reporting, long-term monitoring well design and installation for monitored natural attenuation, operation and maintenance, and regulatory agency liaison.
- Project coordinator for RCRA process at an automobile manufacturing facility located in Detroit, Michigan. Major activities included community relations, Current Conditions Report (CCR) preparation, RCRA Facility Investigation (RFI) development and implementation, Corrective Measures Proposal (CMP) preparation, and interim measures consisting of in situ chemical oxidation and free-product recovery.
- Project coordinator for 77-acre property formerly a tractor engine testing facility redeveloped into mixed commercial/residential located in Troy, Michigan. Major activities included Phase I/Phase II ESA preparation/implementation, Baseline Environmental Assessment (BEA) preparation and approval, building decommissioning, brownfield redevelopment support, ex situ thermal treatment, peer review.
- Project coordinator for various parcels formerly mixed dilapidated residential/commercial property redeveloped into commercial property located in Farmington Hills, Michigan. Major activities included multiple Phase I/Phase II ESA preparation/implementation, multiple BEA preparations and approvals, building decommissioning, and brownfield redevelopment support.
- Project coordinator responsible for preparation of a hydrogeologic investigation work plan at Oyster Creek nuclear generating plant located in Forked River, New Jersey. Major activities included inspection of the site, performance of an extensive file review of station documents, interviews with station personnel, identification of areas requiring further evaluation, and documentation of geologic conditions and groundwater characteristics.
- Project coordinator for 450+ acre property located in Romulus, Michigan. Major activities included Phase I/Phase II ESA preparation/implementation, BEA preparation and approval, and brownfield redevelopment support.
- Project coordinator for 26-acre former landfill located in Westland, Michigan. Major activities included site investigations focusing on mixing zone determination in support of a Remedial Action Plan (RAP) to redevelop the property into mixed residential/commercial.

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- Project coordinator for 200+ acre property located in Shelby Township, Michigan. Major activities included Phase I/Phase II ESA preparation/implementation, geophysical investigation, and brownfield redevelopment support.
- Project coordinator for former metal scrap yards located across Michigan. Major activities included Phase I/Phase II ESA preparation/implementation, construction oversight of impacted soil removal, soil/groundwater sampling, BEA preparation, and/or Remedial Action Plan preparation.
- Project engineer for multiple cemeteries located in Michigan. Major activities included construction oversight of soil removal and regrading, soil sampling, reporting.
- Project engineer for multiple automotive dealerships located throughout the Northeast and Midwest. Major activities included Phase I/Phase II ESA coordination/implementation.

Engineering

- Engineer-of-record for dam safety inspections of Thurston Pond Dam and Long Meadow Pond Dam in Naugatuck, Connecticut.
- Engineer-of-record for over 150 flood damage assessments conducted at residential and commercial properties located throughout New England.
- Engineer-of-record for various Spill Prevention Control and Countermeasure Plans and Stormwater Pollution Prevention Plans in Connecticut and Massachusetts.
- Engineer-of-record responsible for design of a vapor intrusion mitigation system located in Ridgefield, Connecticut.
- Engineer-of-record responsible for remedial design of the former settling lagoon and Beaverdam Brook located in Framingham, Massachusetts.
- Engineer-of-record responsible for remedial design of a cover system located in Bridgeport, Connecticut.
- Engineer-of-record responsible for waste water treatment system at a steel facility in Wallingford, Connecticut.

Environmental Compliance/Multi-Media Permitting

- Project manager responsible for maintaining environmental compliance for an industrial facility located in Hatfield, Massachusetts. Major activities included environmental compliance audit, arc flash hazard analysis, stormwater dye testing, and air permit modifications.

Litigation Support

- Prepared exhibits and testified as fact witness in action styled Allstate Life Insurance Co. v. BFA Limited Partnership f/k/a State St. Cornerstone Assoc., et al.
- Project manager responsible for providing litigation support for landfill downchute failure in New Hartford, Connecticut.

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Appendix B

Routine Inspection Form

ROUTINE INSPECTION FORM

UNITED ILLUMINATING COMPANY HAWTHORNE DRIVE SUBSTATION EXPANSION FAIRFIELD, CT

Inspector Name: _____ **Date:** _____

Inspection Type (Check): Weekly Storm Event **Measured Rainfall** _____ (inches)

Weather Conditions: _____

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."

Signature

Area Inspected	Condition	In Compliance with Permit? (Y/N)	Description of Corrective Action or Maintenance Needed	Date Corrective Action Completed and Initials
Disturbed Areas				
Stabilization Measures • Effective? • Good condition?				
Soil Stockpiles • Evidence of soil migration?				
Washout Areas				
Entrance/Exit • Evidence of sediment tracking?				
Catchbasin on Hawthorne Drive • Insert working properly? • Trash around grate?				

TOF-3-C

Appendix C

SMR Form

TOF-3-C



**Connecticut Department of
Energy & Environmental Protection**
Bureau of Materials Management & Compliance Assurance
Water Permitting & Enforcement Division

General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, issued 8/21/13, effective 10/1/13 Stormwater Monitoring Report

SITE INFORMATION

Permittee: _____
Mailing Address: _____
Business Phone: _____ ext.: _____ Fax: _____
Contact Person: _____ Title: _____
Site Name: _____
Site Address: _____
Receiving Water (name, basin): _____
Stormwater Permit No. <u>GSN</u> _____

SAMPLING INFORMATION (Submit a separate form for each outfall)

Outfall Designation: _____ Date/Time Collected: _____
Outfall Location(s) (lat/lon or map link): _____
Person Collecting Sample: _____
Storm Magnitude (inches): _____ Storm Duration (hours): _____
Size of Disturbed Area at any time: _____

MONITORING RESULTS

Sample #	Parameter	Method	Results (units)	Laboratory (if applicable)
1	Turbidity			
2	Turbidity			
3	Turbidity			
4	Turbidity			

(provide an attachment if more than 4 samples were taken for this outfall)

Avg = _____

STATEMENT OF ACKNOWLEDGMENT

I certify that the data reported on this document were prepared under my direction or supervision in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. The information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Authorized Official: _____
Signature: _____ Date: _____

Please send completed form to:

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
BUREAU OF MATERIALS MANAGEMENT AND COMPLIANCE ASSURANCE
79 ELM STREET
HARTFORD, CT 06106-5127
ATTN: NEAL WILLIAMS