

EXECUTIVE SUMMARY

ES.1 INTRODUCTION

Six minimum control measures are required to be included in the SWMP, to satisfy the requirements of the NPDES Phase II program and CTDEEP's General Permit for the Discharge of Stormwater from Small Municipal Storm Sewer Systems (MS4 General Permit). Specific BMP's for each minimum control measure must be selected and incorporated into the plan, and eventually implemented as part of the Department's stormwater management program.

This SWMP outlines a plan of BMP's and measurable goals for each of the six (6) minimum control measures including Public Education and Outreach, Public Involvement / Participation, Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, Post Construction Stormwater Management and Pollution Prevention / Good Housekeeping. The plan requires that a combination of tasks be undertaken to carry out the BMP's selected for each measure. This includes documentation of policies, procedures and training, development of specific programs and products, conducting public information meetings, development of a storm sewer system map, outfall testing, development of new training and additional maintenance requirements.

The BMP's selected for each minimum control measure are summarized and briefly described in this section. Specific details for each BMP are included in the respective sections for each control measure in this plan. The Bureau Chief of the Bureau Highway Operations will be responsible for implementation and future enforcement of each of the BMP's for the six minimum control measures.

ES.2 PERMIT REQUIREMENTS AND IMPLEMENTATION DATES

The MS4 General Permit was first enacted on January 9, 2004. In 2014 based upon the 2010 US census a change in urbanized areas within Connecticut has required 8 additional municipalities to require registration of this permit which now classifies 121 communities as "Tier 1". All municipalities in Connecticut are responsible for the regulations of the MS4 permit. Urbanized municipalities need to meet Tier 1 requirements and the remaining municipalities have Tier 2 requirements (see CTDEEP MS4 General Permit). All municipalities will be responsible for annual reporting.

CTDOT will be its own entity in regards to the permitting procedure through the CTDEEP independent of the specific municipality requirements (see CTDEEP MS4 General Permit). CTDOT will essentially assume the responsibilities of a Tier 1 municipality based upon the locations that meet department criteria listed in Appendix B.

ES.3 PUBLIC EDUCATION AND OUTREACH

This minimum control measure will outline a program to educate Department employees and the public of the impacts of stormwater discharges on waterbodies, and inform them of the steps that can be taken to reduce stormwater pollution.

The following BMP's have been selected to address the Public Education and Outreach minimum control measure:

- Brochures / Fact Sheets
- Alternative Information Sources – Web Site
- Library of Educational Materials
- Tributary Signage

These BMP's will require the development and distribution of informational materials such as brochures / fact sheets, and a web site. These materials are expected to reach a diverse audience covering a large geographic area, and help inform the public of the importance of stormwater. Additionally, the BMP's will require that educational materials be collected and / or developed and maintained in the Department's library for employee and public use. Since implementation of the SWMP these BMP's have already been implemented and are outlined in detail in Section 3.

ES.4 PUBLIC INVOLVEMENT / PARTICIPATION

This minimum control measure will outline a program to ensure public support as well as provide community knowledge of pollution problems, by taking a proactive approach and encouraging Department employees and the public to get personally involved with monitoring and improving the quality of the environment.

The following BMP's have been selected to address the Public Participation / Involvement minimum control measure:

- CTDOT NPDES Phase II Working Committee
- Public Information Meetings
- Brochure at Public Information Meetings

A working committee was established, consisting of a diverse range of Department disciplines, for the purposes of assisting in and participating in the development of the SWMP for the Department. Meetings began in July of 2002 and continued on a regular basis through the original completion of this plan in 2004.

Public information meetings were held in each of the Department's four districts to educate and involve the public in the development of the SWMP. The meetings were held at the following locations and dates:

- **District 1**
February 20, 2003 at 10:00 a.m.
Connecticut Department of Transportation
Conference A-B
2800 Berlin Turnpike
Newington, CT
- **District 2**
February 18, 2003 at 10:00 a.m.
Waterford Town Hall
15 Rope Ferry Road
Waterford, CT
- **District 3**
February 27, 2003 at 10:00 a.m.
Stratford Town Hall
2nd Floor Council Chambers
2725 Main Street
Stratford, CT
- **District 4**
February 25, 2003 at 10:00 a.m.
Council of Governments of Central
Naugatuck Valley
Lombard Building, Room 300
20 East Main Street
Waterbury, CT

The public information meetings were conducted by the CTDOT along with the Department's consultant for this assignment. The meetings were attended primarily by municipal representatives including public works directors, town engineers and town management from many towns within the districts. Employees of the regional planning agencies, as well as CTDOT employees and some environmental groups also attended.

A presentation outlining the Department's draft stormwater management plan was given, followed by a comment period where individuals could discuss specific topics in detail. Information including presentation slides, the stormwater management plan executive summary and introduction, and a copy of the state contract for laboratory services was provided to all attendees. The attendees were informed that the CTDOT would make information and materials available in the future to aid in the development of their own stormwater management plans.

Public information and outreach will be included on the Departments website and at public meetings see section 4 for greater detail.

ES.5 ILLICIT DISCHARGE DETECTION AND ELIMINATION

This minimum control measure will outline a program that will detect and eliminate potential point sources of contaminants, leaking or discharging into storm sewer systems and ultimately to receiving waterbodies.

The following BMP's have been selected to address the Illicit Discharge Detection and Elimination minimum control measure:

- Department Policy Regarding Non-Stormwater Discharges
- Storm Sewer System Map
- Illicit Discharge Detection and Elimination Program
- Future Illicit Discharge Detection and Elimination

The Department does not allow non-stormwater discharges into its storm sewer systems. This policy and guideline will continue as part of this plan.

The development of a storm sewer system map was initiated by CTDOT to identify and locate Department outfalls greater than or equal to 15" in diameter within urbanized areas and along all interstate highways. Due to limited time, funding, and manpower; mapping efforts were completed for 30% of District 2. However, it is the Departments hope that as funding and opportunity becomes available mapping can be continued.

The BMP's will also require the development of an illicit discharge detection and elimination program. The program will include testing sixteen (16) different outfalls each year. Each of the four (4) districts will test four (4) outfalls per year. One test will be performed for each of the established Average Daily Traffic (ADT) groups per district. The sampling based upon ADT classification will allow for different types of roadways and levels of traffic to be accounted for. Testing was conducted until 2008 when funding was limited making sampling efforts challenging.

The Department will continue to monitor its stormwater discharges in an effort to detect and address future non-stormwater discharges (as funding allows), and will coordinate with Municipal Separate Storm Sewer Systems (MS4), municipalities and other state agencies in identifying illegal discharge / dumping.

ES.6 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

This minimum control measure will outline a program that will reduce pollutants in any stormwater runoff to MS4's from construction activities that result in a land disturbance of greater than or equal to one acre.

The following BMP's have been selected to address the Construction Site Runoff Control minimum control measure:

- Requirements and Guidelines for Erosion and Sediment Controls
- Procedures for Notifying Construction Site Developers and Operators of Requirements for Registration
- Requirements for Construction Site Operators to Implement Appropriate Erosion and Sediment Control Best Management Practices
- Requirements for Construction Site Operators to Control Waste at the Site
- Procedures for Site Plan Review
- Procedures for Receipt and Consideration of Information Submitted by the Public
- Procedures for Site Inspection and Enforcement of Control Measures

The Department requires erosion and sediment controls and registration of permits for all state construction projects. The requirements associated with these items are detailed in several documents / publications developed by the Department including the CTDOT Standard Specifications for Roads, Bridges, and Incidental Construction Form 816 and all

supplemental thereto, the CTDOT Consultant Administration and Project Development Manual and the CTDOT Drainage Manual. Direct reference to the Connecticut Guidelines for Soil Erosion and Sediment Control is made in these documents to provide additional guidance and procedures to be utilized as it relates to this minimum control measure.

All projects with a total disturbance of 1 or more acres of land area on a site regardless of phasing associated with construction activities shall be registered under the General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (Construction General Permit) with the CTDEEP. Registration shall be submitted a minimum of sixty days if disturbance is between one (1) and (20) twenty acres or ninety days if: 1) Disturbance is greater than twenty (20) acres, 2) Dischargers to a tidal wetland within 500 feet of the discharge point, 3) Is subject to impaired waters provisions in Section 3(b) of the DEEP-WEPED-GP-015 prior to the start of construction as required by the construction general permit.

Construction site operators are required to implement appropriate erosion and sediment control best management practices as outlined in contract plans, contract specifications and standard specifications.

The operators are required to control the above mentioned waste by contract specifications, the Department's standard specifications, Form 816 and all pertinent state and federal regulations.

Construction plans and specifications are reviewed for site runoff control by the Department's Office of Environmental Planning for conformance to Department, federal and state permit requirements.

Procedures for receipt and consideration of information submitted by the public are utilized by the Department. Information submitted by the public is forwarded to the appropriate unit within the Department for consideration. Information related to construction site runoff is forwarded to and considered by the Office of Environmental Planning.

Site inspection and enforcement of control measures are utilized on all of the Department's projects. Inspectors employed by the Department are authorized to inspect all work performed and materials furnished for each project. The inspection may extend to all or any part of the work, and to the preparation or manufacture of the materials to be used including work and materials relating to construction site runoff control.

Additional inspection is also provided by the Office of Environmental Planning and the District construction offices.

ES.7 POST CONSTRUCTION STORMWATER MANAGEMENT

This minimum control measure will outline a program that will address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one

(1) acre, including projects less than one acre that are part of a larger common plan of development, that discharge into small MS4's.

The following BMP's have been selected to address the Post Construction Site Runoff Control minimum control measure:

- Requirements for Structural and Non-Structural BMP's
- Procedures for Addressing Post Construction Runoff from Construction and Reconstruction Projects
- Ensuring Long Term Operation and Maintenance of Best Management Practices

Following the 2004 Stormwater Quality Manual and the CTDOT Drainage Manual stormwater management BMP's are required and have become design standards for all projects. BMP enforcement and maintenance is outlined in the CT DEEP Construction General Permit renewed on October 1, 2013. Each of the Departments four maintenance districts assumes the responsibilities for the long term operation and maintenance of the BMP's.

ES.8 POLLUTION PREVENTION / GOOD HOUSEKEEPING

This minimum control measure will outline an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

The following BMP's have been selected to address the Pollution Prevention / Good Housekeeping minimum control measure:

- Operation and Maintenance Program
- Employee Training Program
- Street Sweeping Program
- Catch Basin Maintenance Program
- Preventative Maintenance Program

These BMP's will require the continuation of the Department's operation and maintenance program.

Training will continue to be provided for the proper operation and maintenance of the Department's facilities and roadways. Additional training will be developed to directly address stormwater management and this SWMP. Record keeping will continue to be performed and will be modified to incorporate additional information associated with the SWMP.

Sweeping of all roadways, parking lots and facilities will continue to be performed at least once every year. The sweeping will be performed as soon as possible after snowmelt. Priority areas such as interchange zones, places of public gatherings, and environmentally sensitive areas will be given priority.

The Department will attempt to annually clean at least one third (1/3) of their catch basins that have reached at least half of the capacity of the sump. These catch basins may be selected based upon routine scheduled field inspections and also inspections resulting from other program requirements. The Department will conduct routine inspections by selecting a representative number of catch basins for each stretch of roadway, parking lot and facility, once every year. If a catch basin sump is found to be more than one half (1/2) full, the catch basin will be cleaned.

The Department will continue to operate its preventative maintenance program and will incorporate all of the requirements of this general permit.

ES.9 ADDITIONAL REQUIREMENTS

The following topics are also required for compliance with the MS4 General Permit. A detailed explanation of each of these requirements is located in Section 7 of this Plan.

- Proper Operation and Maintenance
- Availability of Information
- Keeping Plans Current
- Monitoring Requirements
- Reporting and Record Keeping
- General Discharge Requirements
- Total Maximum Daily Load (TMDL) Allocations
- Regulations of Connecticut State Agencies
- Duty to Correct and Report Violations
- Duty to Provide Information
- Correction of Inaccuracies
- Other Applicable Law