

Town of Cromwell Public Works Facility

STORMWATER POLLUTION PREVENTION PLAN FOR THE DISCHARGE OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITY

**1 Community Field Road Cromwell Creek
(James Martin Drive)
Cromwell, CT 06416**



Updated: May 2018

SECTION I: MANAGEMENT CERTIFICATION

“I have personally examined and am familiar with the information contained 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, under 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute.

Town of Cromwell: Public Works Facility

Name of Registrant

By:

Anthony Salvatore
Town Manager

Date

TABLE OF CONTENTS

| | |
|--|---------------------------|
| SECTION I: MANAGEMENT CERTIFICATION | <u>II</u> |
| SECTION II: INTRODUCTION..... | 1 |
| SECTION III: STORMWATER POLLUTION PREVENTION TEAM | 1 |
| SECTION IV: SITE DESCRIPTION | 2 |
| SECTION V: INVENTORY OF EXPOSED MATERIALS | 3 |
| A. MATERIALS INVENTORY..... | 3 |
| a. PUBLIC WORKS FACILITY | 3 |
| b. SALT STORAGE FACILITY..... | 3 |
| SECTION VI: NARRATIVE SUMMARY OF POTENTIAL POLLUTANT SOURCES | 3 |
| A. PUBLIC WORKS GARAGE | 3 |
| B. SALT STORAGE FACILITY | 5 |
| SECTION VII: STORMWATER CONVEYANCE | 5 |
| SECTION VIII: SPILLS AND RELEASES..... | 6 |
| SECTION IX: MONITORING PROGRAM..... | 6 |
| A. VISUAL MONITORING: | 6 |
| C. TEST PROCEDURES..... | 8 |
| D. STANDARD MONITORING BENCHMARKS..... | 8 |
| E. SECTOR SPECIFIC BENCHMARKS..... | 9 |
| F. MONITORING OF DISCHARGES TO IMPAIRED WATERS | 9 |
| G. DATA NOT EXCEEDING BENCHMARKS..... | 10 |
| H. DATA EXCEEDING BENCHMARKS | 10 |
| I. OFF-SITE AND NATURAL BACKGROUND POLLUTANT LEVELS | 11 |
| SECTION X: MEASURES AND CONTROLS..... | 12 |
| A. GOOD HOUSEKEEPING..... | 12 |
| B. ROOF AREAS | 13 |
| C. PREVENTATIVE MAINTENANCE | 13 |
| D. SPILL PREVENTION AND RESPONSE PROCEDURES..... | 13 |
| E. INSPECTIONS..... | 14 |
| F. EMPLOYEE TRAINING..... | 15 |
| G. NON-STORMWATER DISCHARGES | 15 |
| PROFESSIONAL ENGINEER/CERTIFIED HAZARDOUS MATERIAL MANAGER NON-STORMWATER DISCHARGE CERTIFICATION | 16 |
| I. SEDIMENT AND EROSION CONTROL | 17 |
| J. RUNOFF MANAGEMENT | 17 |
| K. CONDITIONS APPLICABLE TO CERTAIN DISCHARGES | 17 |

APPENDICES

APPENDIX 1: SITE PLAN

APPENDIX 2: SPILL REPORT FORM

APPENDIX 3: COMPREHENSIVE SITE COMPLIANCE EVALUATION AND OTHER INSPECTION FORMS

APPENDIX 4: MATERIAL INVENTORY

APPENDIX 5: LIST OF SIGNIFICANT (> 5 GALLONS) SPILLS AND RELEASES

APPENDIX 6: POTENTIAL POLLUTION SOURCES

APPENDIX 7: STATE OF CONNECTICUT PERMIT REGULATIONS

APPENDIX 8: APPLICATION

APPENDIX 9: SAMPLE RESULTS

APPENDIX 10: ROSTERS AND TRAINING RECORDS

SECTION II: INTRODUCTION

The Town of Cromwell, Public Works Facility located at 1 Community Field Road Cromwell Creek (just off Rte 372 and Rte 99), Cromwell, CT. This facility includes the Cromwell Public Works Garages and Salt Storage Facility.

Effective on October 1, 2011 a revised CTDEP General Permit for the Discharge of Stormwater Associated with Industrial Activity took effect. This revised General Permit requires the Public Works Facility to update their current Stormwater Pollution Prevention Plan (SWPPP) as well as recertify this plan.

There were significant changes to this revised General Permit in the following sections, "Contents of the Plan": (Section 5(f)), "Control Measures" (Section 5(b)), "Additional Requirements for Certain Sectors" (Section 5(f)) and Monitoring (Section 5(e)). Each of these changes will be addressed in this updated plan and reviewed with the facility's Stormwater Pollution Prevention Team prior to implementation in October 2011.

SECTION III: STORMWATER POLLUTION PREVENTION TEAM

This is the member and responsibilities list for the pollution prevention team. This list will be updated as necessary. A roster of current individuals is kept in Appendix 10.

Team Manager: First Selectman

Responsibilities: Provide budget, staffing, capital and support to coordinate all stages of Plan development, inspections and implementation with needs of Municipality. Signatory authority for any official CTDEEP documents.

Team Leader: Director of Public Works

Office Phone: (860) 632-3420

Responsibilities: Coordinate all stages of Plan development, inspections and implementation; coordinate employee training program; keep all records and ensure reports are submitted; oversee sampling program; conduct/assist with inspections and training program; conduct sampling.

Team Member: Chief Mechanic

Office Phone: (860) 632-3459

Responsibilities: Implementation of the preventive maintenance program; oversee good housekeeping activities; spill response coordinator for Public Works Garage and salt storage facilities.

Team Member: Working Foreman

Office Phone: (860) 632-3452

Responsibilities: Implementation of the preventive maintenance program; oversee good housekeeping activities; spill response coordinator for Public Works Garage and salt storage facilities.

Team Member: Town Engineer

Office Phone: (860) 632-3465

Responsibilities: Perform environmental monitoring, comprehensive inspections, plan writing and revisions as needed

SECTION IV: SITE DESCRIPTION

The Cromwell Public Works Facility is located on Community Field Rd. (James Martin Drive), southwest of the intersection of West Street (Rte 372) and Main Street (Rte 99) on a level area at an elevation of approximately 26 ft above mean sea level. The nearest surface water bodies are an un-named brook/swale located to the southwest of the site which drains to the Mattabessett River. The brook/swale is listed as Class "A" surface water, and the Mattabessett River is listed as Class "B" by the CTDEEP. The CTDEEP Surface Water Quality Map shows a "Cromwell" pond just to the northeast of the facility. This pond no longer exists; it was filled many years ago to make a municipal park. According to the "Atlas of Connecticut Topographical Maps" the site is found on the Middletown, Connecticut Quadrangle at latitude 41.59419 and longitude - 72.64828 (See Figure I).

A portion of the southern edge of site is located in a 100-yr floodplain. No portion of the site is located within 250 feet of a well utilized for potable drinking water. The site is not located in a Level A Aquifer protection area. The site is not located on federally recognized "Indian Lands" or in conservation or preservation restricted area. The site is not located in a coastal boundary area as delineated by CTDEEP approved coastal boundary maps. The site is located adjacent to an area identified as a habitat for endangered, threatened or special concern species.

The site is accessible from the eastern side via a gated and paved entrance from Community Field Rd. The site is bounded by a chain link fence and secured at night with a sliding security gate. The facility area is used to store equipment, vehicles, pipes, culvert, storm sewer components, soils, and stone and also provides a fueling station for the Town fleet vehicles.

The "Site Plan" located in Appendix I shows the buildings and layout of the Public Works Facility. Starting at the entrance to the Site, employee parking is along the fence on the right. On the left is the gasoline and diesel fuel storage/dispensing station. The tank is a double lined, alarmed above ground tank with a capacity of 4,000- gallons of unleaded gasoline and 4,000-gallons of diesel fuel. The fueling station is adjacent to a wooden "T" shaped building that houses miscellaneous equipment. A shipping container holding tires is adjacent to the west side of the "T" shaped building. Proceeding straight ahead is the salt storage shed. In front of the northwest corner of the salt storage shed is the waste dumpster and cardboard dumpster. Located around the perimeter of the salt storage shed are miscellaneous pieces of equipment along the north fence line, and construction materials along the western and southern fence lines. Moving along the southern fence line is a metal Quonset hut that acts as a vehicle and equipment cold storage garage. Next is the maintenance garage where vehicle maintenance and repairs are done. Adjacent to the maintenance garage building are antifreeze, used oil and oil filter recycling containers. A site emergency generator is located at the northeast corner of the maintenance garage. To the east of the maintenance garage is the larger vehicle garage. This space also includes the field office for public works. Along the east side of the vehicle garage is a shipping container, which houses temporary road and construction signs and barricades/cones. At the southeast corner of the vehicle garage is an empty 1,000-gallon fuel oil storage tank (building converted to NG). Along the eastern fence line of the facility is where various pieces of construction machine attachments are stored.

SECTION V: INVENTORY OF EXPOSED MATERIALS

Exposed materials are limited to construction materials; catch basin and manhole components, storm drainage pipe, stone, sand, etc.

A. MATERIALS INVENTORY

a. PUBLIC WORKS FACILITY

- Gasoline
- Diesel Fuel
- Motor Oil
- Gear Oil
- Grease
- Hydraulic Fluid
- Waste Hydraulic Fluid
- Waste oil
- ATF Fluid
- Antifreeze
- Solvents: lacquer thinner
- Solvents: Reducer
- Cold patch asphalt
- Topsoil
- Stone (crushed)
- Processed Gravel
- Groundskeeping equipment (Mowers, Tractors)
- Vehicles (cars, trucks)
- Used batteries
- Paints
- Miscellaneous chemicals

b. SALT STORAGE FACILITY

- Treated Salt (sodium chloride)
- Sand and salt mixture

SECTION VI: NARRATIVE SUMMARY OF POTENTIAL POLLUTANT SOURCES

The following is a summary of potential pollutant sources in each area of the facility.

A. Public Works Garage

Vehicle fueling area: There is an aboveground dual fuel storage tank containing gasoline and diesel centrally located near the entrance to the public works compound. The tanks hold 4,000 gallons each of unleaded gasoline and road diesel. The tanks are manufactured by CONVAULT and provide double wall protection along with leak detection alarms. The tanks are located on an impervious surface with a spill kit adjacent to the dispensing pumps. The potential pollution source is spillage from transfer of diesel fuel to the tanks or

vehicles. All transfers are under the direct control of a trained operator and spill response supplies are available if needed. Recommend: Consider adding a cover over the fueling area.

Loading and unloading areas: The loading and unloading area for road maintenance and vehicle maintenance is in front of the vehicle and maintenance garages. The area is not covered. The potential pollutant sources for this area include oils, hydraulic fluids, radiator fluids, paints and miscellaneous materials.

Inside public works maintenance garage: The following fluids are stored on a secondary containment pallet on the concrete floor: 55-gallon drum of hydraulic fluid, 5-gallon containers of tack coat and gear lube in 5-gallon containers. The potential pollutant source is spillage of these fluids during transfer of these materials to the vehicles. The oil and grit separator located outside this building collects any drippage and vehicle maintenance wastewater via the floor drains. The outlet of the oil and grit separator is connected to the sanitary sewer. The oil and grit separator is routinely inspected and is emptied by Safety Kleen as needed. The potential source of pollution is spillage or oils when cleaning the oil/grit separators and pumping the material into a collection vehicle. In the garage are flammable storage lockers that contain paints, thinners and other maintenance supplies in small containers. Spill kits are available in the maintenance garage.

Outdoor storage: An emergency generator with an inherent fuel tank is located at the northwest corner of the building on an impervious surface. The potential pollution source is spillage from transfer of fuel to this generator. Spill kits are available in the maintenance garage. On the east side of the building is a shipping container which is used to house construction signs, barricades, cones, etc. The trailer does not contain potential pollution sources. At the southeast corner of the building is an empty 1,000-gallon AST formerly used for fuel oil. The building was converted to natural gas heat in 2011. This tank may be repurposed as a construction equipment fuel storage tank in the near future.

Inside vehicle maintenance garage: The garage floor is impervious concrete with floor drains connected to the oil and grit separator outside the building on the west side. The oil and grit separator is connected to the sanitary sewer via a pump chamber. Motor oil, gear lube, hydraulic fluid and grease are stored in 55-gallon drums, gallon pails or 120-pound containers connected to an automated dispensing system. Drums/containers are stored on secondary containment pallets on the concrete floor. Other fluids stored on secondary containment pallets include coolant and transaxle fluid. Batteries are stored on a separate secondary containment pallet. Smaller quantities of various vehicle fluids including but not limited to brake fluid, power steering fluid, grease tubes, brake cleaner, solvents, etc are stored in small containers on shelves and inside fire cabinets in the facility.

Waste Disposal Practices: The 500-gallon AST used to collect waste oil is located on the west side of the maintenance garage. This tank is located on a paved surface with secondary containment. The potential pollutant sources are spillage during transfer of waste oil to the tank or collection vehicle. All transfers are under the direct control of a trained operator and spill response supplies are available if needed. Any runoff from this container would enter the catch basin connected to the oil and grit separator.

The 300-gallon AST used to collect waste antifreeze is located on the west side of the maintenance garage. This tank is located on a paved surface with secondary containment. The potential pollutant sources are spillage during transfer of waste oil to the tank or collection vehicle. All transfers are under the direct control of a trained operator and spill response supplies are available if needed.

The 330-gallon AST used to store used oil filters is located on the north side of the maintenance garage. This tank is located on a paved surface with secondary containment. The potential pollutant sources are

spillage during transfer of waste oil to the tank or collection vehicle. All transfers are under the direct control of a trained operator and spill response supplies are available if needed.

To the north of the Public Works Garage is a “T” shaped wooden structure that serves as cold storage for various pieces of maintenance equipment including yard tools, sewer department generators, tractors, etc. No fueling or maintenance operations are conducted inside this building, so the potential for pollutant release is low.

To the west of the Vehicle Maintenance Garage is a Quonset hut cold storage building. Inside this building are various public works equipment and signage. No fueling or maintenance operations are conducted inside this building, so the potential for pollutant release is low.

Along the west side of the facility is the outdoor storage area. Piles of crushed stone, sand and road sweepings are stored in this area. Asphaltic cold patch is stored in this area under a covered area. The potential pollutant sources from these piles are silt, dust and sediment. There is also storage of concrete and plastic storm sewer components and storage of other miscellaneous public works equipment and containers.

B. Salt Storage Facility

Loading and unloading areas: The loading and unloading area for salt is the storage building on the west side of the facility. The salt storage pile is covered and enclosed by a 50’x100’ covered structure of concrete and metal on three sides that was constructed in 2002. The only potential pollutant source is spillage when the salt is transported to trucks or stockpiles. There is a catch basin inside the salt storage building that is connected to the sanitary sewer.

Outdoor storage: There is no outside exposed storage of treated salt.

SECTION VII: STORMWATER CONVEYANCE

The Site storm drainage system has been installed to convey stormwater runoff from the Public Works Facility to the adjacent water bodies. The site storm drainage sheet flows towards the catch basin system which is a part of the Town of Cromwell’s MS4 system. This particular section of the MS4 system begins at the intersection of Main and West Streets (Rte. 99 and 372). From there a series of catch basins run down West Street to the entrance of Community Field Road at the Police Department Building. From there the system works its way down Community Field Road picking up additional flows from the Police and Fire Departments, the Sewer Garage. The system then veers to the west and runs in a southerly direction along the east side of Community Field. The system then turns west crossing Community Field then turns south and runs through the Public Works Facility. A secondary system starts at the sewer garage and works its way down Community Field Rd and James Mann Drive picking up run-off from commercial buildings along Main Street and runoff from the public park and Community Field Road, then runs through the public works facility and connects to the main system.

There is one (1) outfall from the Public Works Facility.

Outfall No. CC-0F-0009: is a forty-eight (48) inch reinforced concrete flared end pipe (RCP) that is located at the following coordinates, latitude 41.59000° N and longitude -72.65°W. This is on the eastern bank of the

small unnamed stream/swale that passes along the western side of the facility. The grate inlet located between the salt shed and Quonset hut is the sample point. This location better represents the facility storm water than the outfall which combines with Town and DOT MS4's.

Site maps showing the location of buildings, ASTs and any other important structures are included in Appendix I.

SECTION VIII: SPILLS AND RELEASES

According to the Public Works Director there have been no reported releases to the Oil & Chemical Spill Section of CTDEEP.

SECTION IX: MONITORING PROGRAM

All permittees must conduct stormwater outfall monitoring under this general permit. Each permittee has different monitoring procedures, frequencies and parameters based upon the nature of their industrial activity. In addition the permittee may have to modify their plan and control measures based upon their monitoring results and the nature and condition of the waters receiving their stormwater discharge. For this facility starting on October 1, 2011 the following monitoring parameters will be required.

OUTFALL MONITORING

Standard Monitoring Parameters

A. Visual Monitoring:

Once each quarter for the entire length of the general permit term (five years) a stormwater sample must be collected from each outfall or representative outfall at the facility for visual assessment.

These samples must be collected in such a manner that they are representative of the stormwater discharge. Quarters for visual monitoring will begin October 1, 2011 and continue every quarter January-March, April-June, July-September and October-December until this general permit expires on September 30, 2016.

The stormwater sample must be collected in a clean, clear glass, or plastic container. Samples must be examined in a well-lit area. The samples must be visually inspected for the presence of the following water quality characteristics:

- Color
- Odor
- Clarity
- Floating Solids
- Settled Solids
- Suspended Solids
- Foam
- Oil Sheen
- Other obvious indicators of stormwater pollution

The permittee shall maintain the documentation of these visual assessments in the Plan.

If the indicators from the visual assessment indicate that the control measures for the facility are inadequate or improperly operated then the permittee must review and revise the selection, design, installation and implementation of the control measures to ensure that the condition is eliminated and will not be permitted in the future.

B. General Monitoring

Semiannually starting on October 1, 2011 one (1) stormwater sample shall be taken between Oct 1st and March 31st from each outfall or representative outfall at the facility and one (1) stormwater sample from each outfall or representative outfall at the facility shall be taken between April 1st and September 30th, for four (4) consecutive semiannual sampling events.

All stormwater samples used for monitoring shall be grab samples and shall not be combined. Collection of grab samples shall begin during the first thirty- (30) minutes of a storm event discharge (i.e., flow at the discharge pipe or swale) and shall be completed as soon as possible. Samples can be taken at the outfall or nearest feasible location representative of the discharge. The uncontaminated rainfall pH measurement shall also be taken at this time to coincide with the same rain event as the stormwater sample. All discharge samples at a facility must be taken during the same storm event.

All stormwater samples shall be collected from discharges resulting from a storm event that occurs at least 72 hours after any previous storm event generating a stormwater discharge. Any sampling containing snow or ice melt must be identified on the Stormwater Monitoring report. One semi-annual sampling event should occur between October 1st and March 31st. The other semi-annual sampling event should occur between April 1st and September 31st. Semi annual monitoring events shall be separated by at least thirty- (30) days.

A representative discharge is when a facility has two or more outfalls that, based on a consideration of features (e.g. grass vs. pavement, slopes, catch basins vs. swales) and activities within the area drained by the outfall, the permittee believes discharge substantially identical effluents. The permittee may test the effluent of one such outfall and report that the quantitative data is representative of the substantially identical outfalls. The single outfall sampled at the facility is representative of the industrial stormwater discharge including the transfer station that has no conveyances but only sheet runoff across paved areas and through the culverts in the berm.

- a. The following storm event information shall be collected for the semiannual sampling events
 - The date, discharge temperature, time of start of the discharge, time of sampling and magnitude in inches of the storm event.
 - **The pH of the uncontaminated rainfall before it contacts the ground and**
 - The duration between the storm event and the end of the most recent storm event that produced a discharge.
- b. Monitoring shall be conducted for the following parameters collected during the semiannual stormwater events.
 - Chemical Oxygen Demand (COD)
 - Total Oil & Grease
 - pH
 - Total Suspended Solids (TSS)
 - Total Phosphorus
 - Total Kjeldahl Nitrogen (TKN)
 - Nitrate as Nitrogen

- Total Copper
 - Total Lead
 - Total Zinc
- c. During the first two (2) years of the permit October 1, 2011 through September 30, 2012 and October 1, 2012 through September 30, 2013. Monitoring shall be conducted annually for the following parameter
- Aquatic Toxicity

This parameter monitoring shall be included in a regularly scheduled semiannual sample during that respective year.

C. Test Procedures

Unless otherwise specified all pollutant parameters shall be tested according to methods prescribed in 40 CFR, Part 136. Laboratory analysis must be consistent with Connecticut Reasonable Confidence Protocols (RCP). To comply with RCP the following items must be followed for samples delivered to the laboratory.

- All samples received by the laboratory are in a condition consistent with that described on the associated "Chain of Custody" (i.e. proper containers, preservatives and labels as required)
- The Chain of Custody shall specify "RCP" so that the Laboratory Reporting limits (RL) will attempt to reach the lowest laboratory method detection limit (MDL) for each parameter analyzed
- The samples received were iced and at an appropriate temperature (<0.6°C)
- The samples must be received as soon as possible or within minimal holding times for the parameters being analyzed. (i.e. e coli: 6 hrs, Aquatic Toxicity 36 hrs). **Check with the laboratory for hours of operation and any critical holding times.**

Acute toxicity biomonitoring tests shall be conducted according to procedures specified in Methods for Measuring the Acute Toxicity of Effluent Receiving Waters to Freshwater and Marine Organisms, 5th Edition (EPA 821-R-02-012).

D. Standard Monitoring Benchmarks

All permittees are required to comply with the benchmarks for standard parameters as specified in this subsection and otherwise specified as additional parameters for certain sectors. Benchmark monitoring shall be conducted semiannual and can be conducted with quarterly visual monitoring.

Benchmarks: Samples shall be analyzed for the parameters listed below by a laboratory certified by the State of Connecticut.

| PARAMETER | UNIT | BENCHMARK LEVELS |
|------------------------|------|------------------|
| Total Oil and Grease | mg/L | 5 |
| Chemical Oxygen Demand | mg/L | 75 |
| Sample pH | | 5-9 |

| | | |
|-------------------------|------|-----------------|
| Total Suspended Solids | mg/L | 90 |
| Total Phosphorous | mg/L | 0.40 |
| Total Kjeldahl Nitrogen | mg/L | 2.30 |
| Nitrate as Nitrogen | mg/L | 1.10 |
| Total Copper | mg/L | 0.059 |
| Total Lead | mg/L | 0.076 |
| Total Zinc | mg/L | 0.160 |
| Aquatic Toxicity | | LC50 \geq 50% |

E. Sector Specific Benchmarks

This facility is identified as Sector G –Transportation and Public Works Facilities under the general permit. This facility has solid de-icing material storage on-site in conjunction with other activities. Monitoring for the following parameters is required in a sample taken of a discharge that is representative of the quality of the runoff from the deicing storage activity.

| PARAMETER | UNIT | BENCHMARK LEVELS |
|-----------|------|------------------|
| Chloride | mg/L | NE |
| Cyanide | mg/L | NE |

NE= Not established

At this facility that discharge shall be collected at Outfall CC-OF-0009. The General Permit requires reporting the monitoring results of these two parameters but this monitoring is not subject to Benchmark requirements for chloride and cyanide.

Also in addition to the above parameters, any pollutants listed as an effluent limitation to which the permittee is subject must be monitored annually for the entire term of this general permit. **CHECK THIS**

F. Monitoring of Discharges to Impaired Waters

Industrial Activities that discharge to impaired waters, as identified with or without an established Total Maximum Daily Load (TMDL) must also monitor annually for any indicator pollutants as identified as contributing to the impairment and for which a standard analytical method exists. No monitoring is required if a waterbody's biological communities are impaired but no pollutant, including indicator or surrogate pollutants, is identified as an indicator of the impairment, or when a waterbody's impairment is related to hydrological modifications, impaired hydrology or temperature.

This monitoring requirement does not apply after the first year of monitoring if the indicator pollutant is not detected above natural background levels as determined by the commissioner, in the stormwater

discharge or is the result of run-on entering from off-site and the permittee has documented that diversion of this off-site run-on is not feasible or practicable in accordance with "Off-site and natural background pollutant levels". In either case the permittee must provide such documentation to the Commissioner.

For stormwater discharges to waters for which there is a TMDL established the permittee is not required to monitor for any indicator pollutant identified unless informed in writing by the CTDEP upon examination of the applicable TMDL and/or Waste Load Allocation (WLA), that the permittee is subject to such requirement consistent with the assumptions of the applicable TMDL or WLA. This CTDEP notice will provide the specifications on which pollutant to monitor and the frequency during the first year of the General Permit.

If the indicator pollutant is not detected in any first year samples the permittee may discontinue sampling unless the TMDL has specific instructions to the contrary. The permittee must follow those instructions and keep records of the findings with this plan. If the indicator pollutant is detected in the first year sampling then the permittee must monitor annually for this indicator for the five-year term of this permit unless the TMDL specifies more frequent monitoring.

The stormwater discharge from this facility enters a wetlands/waterbody. The CTDEP has identified as located in watershed ID # 4600-00. At this time the CTDEP has identified this watershed as impaired water.

G. Data Not Exceeding Benchmarks

After collection of four (4) semiannual events, if the average of the four (4) monitoring values for any parameter does not exceed the benchmark, the monitoring requirement for that parameter have been fulfilled for the term of the general permit (five years). For the purpose of averaging any value below the laboratory MDL (no positive detection) for that parameter will use a value of half of the MDL reported by the laboratory. For analysis levels that fall between the MDL and RL (positive detection above MDL but below RL) use a value of half the laboratory RL. Once the benchmark has been met and monitoring for pH has been fulfilled, the measurement for rainfall pH is no longer required.

H. Data Exceeding Benchmarks

Within 120 days of receiving the results of the fourth semiannual sample, if the average of the four (4) semiannual sample results for any parameter exceeds the benchmark, the permittee must, in accordance with keeping the plan current review the design installation and implementation of the control measures to determine if modifications are necessary to meet the benchmarks in this permit and either

- a. Make the necessary modifications to control measures and the SWPPP and continue semiannual monitoring until the permittee has completed four consecutive semiannual monitoring events for which the average does not exceed the benchmark; or
- b. Make a determination that no further pollution reductions are technologically available and economically practicable and achievable in light of best industry practice to implement additional control measures or meet the benchmarks, in which case the permittee must continue monitoring once per year. The permittee must also document the rationale for concluding that no further pollutant reductions are achievable and submit this documentation to the Commissioner for written approval. The permittee must retain all records related to this documentation with the SWPPP.

If the exceedance of the four (4) sampling event average is mathematically certain the permittee must review the control measures and perform any required corrective action immediately or document why no corrective action is required, without waiting for the full four (4) monitoring events, in accordance with keeping the SWPPP current. If after modifying the control measures and conducting additional semiannual monitoring, the average of the most recent four monitoring events still exceeds the benchmark or if an exceedance of the

benchmark by the four event average is mathematically certain for the most recent four monitoring events, the permittee must again review the control measures and take one of the two bulleted actions above.

I. Off-site and Natural Background Pollutant levels

Following the first four semi-annual samples of benchmark monitoring (or sooner if the exceedance is triggered by less than four monitoring events), if the average concentration of a pollutant exceeds a benchmark value and the permittee determines that exceedance of the benchmark is attributable solely to the presence of the pollutant in the natural background or “run-on” entering from off-site, the permittee is not required to perform corrective action or additional benchmark monitoring provided all of the following conditions are met:

- a. The average concentration of the benchmark monitoring results is less than or equal to the concentration of that pollutant in the natural background or site “run-on”;
- b. The permittee documents and maintains with the SWPPP the supporting rationale for concluding that benchmark exceedances are in fact attributable solely to natural background or off-site pollutant levels. The permittee must include in the supporting rationale any data previously collected by them or others that describe the levels of natural background pollutants in the stormwater discharge.
- c. The permittee demonstrates that the diversion of off-site run-on containing these pollutant levels is not feasible or practicable;
- d. The permittee notifies the commissioner on the final semiannual benchmark monitoring report that the benchmark exceedances are attributable solely to natural background or off-site pollutant levels; and
- e. The commissioner issues a written approval of the permittee’s documentation demonstrating that the benchmark exceedances are attributed solely to natural background or off-site pollutant levels.

Naturally background pollutants include those substances that are naturally occurring in rainfall, soils or groundwater. Natural background pollutants do not include legacy pollutants from earlier activity on the site. The Stormwater Monitoring Report form (SMR), a copy of which is kept with this Plan for at least five (5) years following the expiration of this general permit and a copy of which is submitted to the DEP with in ninety (90)-days of the sampling date, is used to record the necessary information for the storm event monitored and the monitoring results.

The CT-DEP requires that we collect and record the following information for the storm events monitored and reported on the Stormwater Monitoring Report form:

- ☐ Date, temperature, time of the start of discharge, time of sampling, and magnitude (in inches) of the storm event sampled
- ☐ Sampling Location(s) (for example, “Outfall #1”)
- ☐ Name and title of person collecting the sample
- ☐ The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event.
- ☐ Uncontaminated rainfall pH

If a permittee is unable to collect a sample pursuant to “Visual Monitoring” or “Additional requirements for Certain Sectors” due to the inability to meet the conditions in Section A (B) of this plan then for “Visual Monitoring” document such inability in their Plan. For all other monitoring submit the SMR with a notation of “no discharge” and an explanation of the limitations restricting the collection of an appropriate sample.

SECTION X: MEASURES AND CONTROLS

A. GOOD HOUSEKEEPING

- a. The permittee must keep a clean orderly facility by sweeping frequently, appropriate storage of materials, proper garbage collection, proper waste management practices and dust control if required.
- b. Vehicle and equipment storage shall minimize the potential for stormwater exposure to leaky or leak prone vehicles/equipment awaiting maintenance.
 1. Use of drip pans
 2. Indoor storage of vehicles
 3. Installation of berms or dikes
 4. Use of absorbents
 5. Roofing or covering storage areas
 6. Cleaning pavement surfaces of oil and grease
- c. The permittee shall minimize the potential for contamination from fueling areas.
 1. Provide a cover to the fueling area
 2. Use of overfill and spills protection.
 3. Minimize stormwater run-off in this area
 4. Provide spill kit with catch basin covers
 5. Use dry cleanup methods
 6. Treating or recycling of stormwater run-off from this area
- d. The permittee must minimize contamination of stormwater run-off from all areas used for vehicle/equipment cleaning. At a minimum no washing of buildings or rinsing of equipment shall be allowed that would allow wash or rinse waters to enter any storm drainage system or surface waters of the State without a permit. Such vehicle washing or equipment cleaning discharges to groundwater is not authorized by this permit.
 1. Perform all cleaning measures indoors
 2. Covering the cleaning operation if outdoors
 3. Ensure all wastewater drains to a proper collection system
 4. Treating and/or recycling of collected wastewater or discharging to a sanitary sewer.
- e. The permittee must minimize exposure to stormwater of materials identified in the “Inventory of Exposed Materials” and for facilities constructed after July 15, 2003.
- f. The permittee must provide that all floor drains have been sealed, authorized by a local authority to discharge to sanitary sewer or allowed by CTDEP in accordance with the “Non-Stormwater Discharges” of the general permit.
- g. The permittee must minimize contamination of stormwater run-off from all areas used for vehicle/equipment maintenance.
 1. Perform maintenance activities indoors
 2. Use drip pans where feasible
 3. Keep inventory of materials used in shop
 4. Drain all parts of fluids before disposal
 5. Prohibit wet clean up practices if these practices cause a discharge

6. Use dry cleanup methods
7. Treating or recycling of stormwater run-off from this area
8. Minimizing stormwater run-off from this area.

B. ROOF AREAS

The Public Works facility roof areas are flat or pitched with drains or gutters and downspouts that discharge onto paved areas of the site or into roof leaders connected to the storm sewer system.

With the exception of heating equipment vents there are no other processes that discharge to the roof areas.

These discharges would have negligible impact on stormwater collecting and discharging off these roofs.

C. PREVENTATIVE MAINTENANCE

1. The inspection and maintenance of stormwater management devices (i.e. catch basins, oil grit separators)
2. Above ground storage tanks (ASTs) and secondary containment structures will be inspected regularly for signs of corrosion or leaks. . The drain plugs will be kept closed at all times.
3. The covers or lids on all bins, dumpsters, or trucks are in place during all storm events.

D. SPILL PREVENTION AND RESPONSE PROCEDURES

1. **Note: Only properly trained individuals can respond to a spill.**
2. The spill will be evaluated to determine the necessary response. If there is a health hazard or fire or explosion potential, 911 will be called. If the spill is large or threatens surface water systems (including stormwater structures), the CT-DEP Oil and Chemical Spills Unit will be called at (860) 424-3338

Note: Any chemical spill greater than the listed federal reportable quantity (RQ) will also need to be reported to the National Response Center (NRC).

File a written “Report of Petroleum or Chemical Product Discharge, Spillage, Seepage Filtration” with Connecticut DEP. (See Appendix 3) the following day.

3. Small spills will be contained as close to the source as possible with a dike of absorbent materials from the emergency spill kit (such as socks, pads, or pillows). Additional dikes will be constructed to protect swales or other stormwater conveyances or streams. A cover or dike will protect any other stormwater structures such as catch basins.
4. A spill report will be completed (See Appendix 3) and maintained on file. A copy will be submitted to the DEP Oil and Chemical Spill Response Division.
5. All waste material and contaminated spill absorbent materials will be disposed of properly. The proper disposal of hazardous or regulated wastes will be in compliance with all applicable Federal, State and Local regulations.

6. **Penalties:** Failure to report discharge, spill, loss seepage or filtration of any oil & chemical or petroleum or chemical liquids or solid, liquid or gaseous product or hazardous wastes as required by Section 22a-450 the Connecticut General Statutes requires that a person be fined not more than one thousand dollars (\$1,000.), and the employer of that person not more than five thousand dollars (\$5,000.). These fines increase to \$5,000 and \$10, 000 respectively for not reporting a spill of gasoline.

E. INSPECTIONS

The Team Leader, Team Member or their designee shall conduct inspections.

The Public Works facility requires the following routine inspections:

- A. **Comprehensive Site Inspections:** Qualified personnel shall conduct these inspections every April and October in a calendar year.
 - a. Visual inspection of the material handling areas and any other potential sources of pollution shall be inspected for evidence of or the potential for pollutants entering the stormwater drainage system.
 - b. Structural stormwater management measures, erosion control measures, control measures and other structural pollution prevention measures identified in this SWPPP shall be visually inspected to ensure they are implemented and maintained properly.
 - c. An inspection of any equipment needed to implement the SWPPP such as spill response equipment shall be inspected.
 - d. When possible these inspections should be made during a rainfall event.
 - e. These inspections shall include any remedial actions, if required, and provide a timetable to re-inspect to ensure compliance with the recommendations contained therein.
 - f. Both Inspection Form I and Form II (see Appendix 2) are used for this inspection. They must be reviewed by the permittee and kept with the SWPPP for at least five years.
- B. **Routine Monthly Inspections:** Qualified personnel must conduct these inspections every month.
 - a. Visual inspections of designated equipment and sensitive areas of the site shall be inspected.
 - b. A written set of tracking or follow-up procedures shall be used to ensure that appropriate actions are taken in response to these inspections.
 - c. Records shall be kept with the SWPPP for at least five years.
 - d. The areas to be inspected our in the table below

| | |
|---|---|
| 1 | Aboveground Fuel Tanks (Gasoline & Diesel) |
| 2 | Maintenance Garage |
| 3 | Flammable & Combustible materials are properly stored inside? |

| | |
|----|---|
| 4 | Maintenance Garage Outside Box Trailer Storage |
| 5 | Vehicle Storage Garage |
| 6 | Quonsett Vehicle/Equipment Storage Garage |
| 7 | Salt Storage |
| 8 | Outside Storage Area |
| 9 | All Catch Basins |
| 10 | The Outfall |
| 11 | Site Perimeter Fencing |
| 12 | All Exterior Trash Bins Covered and Emptied Routinely |
| 13 | Liquid Recycling Tanks Secure and Emptied Routinely |
| 14 | All Spill Kits Stocked and Secure |
| 15 | Other |

F. EMPLOYEE TRAINING

All employees will be trained annually. New hires will complete the course for all employees and any other appropriate segments of the training within three (3) months (90 days) of hire.

Pollution prevention team members will meet together at least biannually for the purpose of discussing the Plan, the Site Compliance Inspection, and Preventative Maintenance Procedures.

The topics below will be covered at employee training sessions.

Training topics will include:

The Pollution Prevention Plan

- a. What it is, an outline of potential sources of stormwater pollution and reduction/elimination methods
- b. What it contains, good housekeeping measures and location of potential pollution sources?
- c. Pollution Prevention Team – The team will be introduced, explaining the need to be continually looking to avoid pollution to the storm system and that input and assistance is appreciated.
- d. Discuss the location of storm drain structures and note the receiving water of the storm system.
- e. Review the spill prevention and response procedures.
- f. Review of good housekeeping practices.
- g. A sign-off sheet for each annual training signed by all attending employees and the supervising member of the pollution prevention team is kept with the Plan.

G. NON-STORMWATER DISCHARGES

A. The Certification on the following page:

Professional Engineer Non-Stormwater Discharge Certification

"I Certify that in my professional judgement, the stormwater discharge from the site consists only of stormwater, or stormwater combined with wastewater authorized by an effective permit issued under section 22a-430 or section 22a-430b of the Connecticut General Statutes, including the provisions of this general permit, or of stormwater combined with any of the following discharges provided they do not contribute to a violation of water quality standards

- Landscape irrigation or lawn watering;
- Uncontaminated groundwater discharges such as pumped groundwater, foundations drains, water from crawl space pumps and footing drains;
- Discharge of uncontaminated air conditioner or refrigerate condensate;
- Water sprayed for dust control or a truck load wet-down station;
- Naturally occurring discharges such as rinsing ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), springs, and flows from riparian habitats and wetlands.

This certification is based on testing and/or evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing methods used, the date of the any testing and/or evaluation, and the on-site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to sanitary sewer. I am aware that there may be significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

Jon C. Harriman, P.E.

Printed Name of Professional Engineer

Signature/Seal of Professional Engineer

Date: _____

Registration No.: 22022

I. SEDIMENT AND EROSION CONTROL

The site is generally paved with the exception of vegetative buffers. In most places the paving is curbed and directs stormwater to catch basins. The vegetation absorbs the sheet run-off in areas that are paved and not curbed.

The permittee shall identify any areas that have the potential for soil erosion due to topography, activities or other factors and shall implement measures to limit erosion and stabilize such areas. All construction activities on site shall be conducted in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.

Any future construction activity that disturbs greater than one (1) acre must be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activity (as amended).

In addition, the permittee shall avoid wherever possible, the use of copper or galvanized roofing or building materials for any new building construction where these materials will be exposed to stormwater.

J. RUNOFF MANAGEMENT

The following runoff management practices are used at this facility:

All pervious surfaces as maintained as vegetative surfaces to dampen and absorb the initial rainfall amounts.

K. CONDITIONS APPLICABLE TO CERTAIN DISCHARGES

- a. Any person who or municipality which initiates, creates, or originates a discharge of stormwater associated with industrial activity after October 1, 1997, which discharge is located less than 500 feet from a tidal wetlands which is not a fresh-tidal wetland, shall discharge such stormwater through a system designed to retain the volume of stormwater run-off generated by 1 inch of rainfall on the site. If there are site constraints that would prevent retention of this volume on-site (e.g., soil contamination, elevated groundwater, potential groundwater drinking supply area, etc.), documentation must be submitted, for the commissioner's review and written approval, which explains the site limitations and offers an alternate retention volume and/or additional stormwater treatment. For sites unable to comply with this section, the commissioner, at the commissioner's sole discretion, may require the submission of an individual permit application in lieu of authorization under this general permit.
- b. Any person who or municipality which discharges stormwater below the high tide line into coastal, tidal, or navigable waters for which a permit is required under Structures and Dredging Act in accordance with sections 22a-361(a) of the Connecticut General Statutes or into tidal wetlands for which a permit is required under Tidal Wetlands Act in accordance with section 22a-32 of the Connecticut General Statutes, shall obtain such permit(s) from the commissioner.
- c. There shall be no distinctly visible floating scum, oil or other matter contained in the stormwater discharge. Excluded from this are naturally occurring substances such as leaves and twigs provided no person has placed such substances in or near the discharge?

- d. The stormwater discharge shall not result in pollution due to acute or chronic toxicity to aquatic and marine life, impair the biological integrity of aquatic or marine ecosystems, or result in an unacceptable risk to human health.
- e. The stormwater discharge shall not cause or contribute to an exceedance of the applicable Water Quality Standards in the receiving water.
- f. Any new stormwater discharge to high quality waters (as defined in the Water Quality Standards shall be discharged in accordance with the Connecticut Anti-Degradation Implementation Policy in the Waters Quality Standards manual.

Professional Engineer Plan Certification:

“I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for this site. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Stormwater Associated with Industrial Activity effective October 1, 2011. I am aware that there may be significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements.”

Jon C. Harriman, P.E.

Printed Name of Professional Engineer

Signature/Seal of Professional Engineer

Date: _____

Registration No.: 22022

APPENDIX 1

SITE PLAN

APPENDIX 2

COMPRHENSIVE SITE COMPLIANCE EVALUATION AND OTHER INSPECTION FORMS

Form I
Comprehensive Site Compliance Evaluation

Town of Cromwell
Public Works Facility
Community Field Road
Cromwell, CT 06416

Date:

Inspected by: Jon Hariman

I. Any changes to Pollution Prevention Team? Yes: ____ No: ____
(Describe Below):

II. Any changes to Site Plan? Yes: ____ No: ____
(Describe Below):

III. Any changes to Exposed Materials Inventory? Yes: ____ No: ____
(Describe Below):

IV. Any Reported Spills or Leaks? Yes: ____ No: ____
(Describe Below):

V. Any Changes to the SWPP Plan? Yes: ____ No: ____
(Describe Below):

| FORM II | | | |
|--|---|----------|----------|
| Monthly Inspection | | | |
| Town Cromwell Public Works Facility Community Field Road Cromwell, CT 06416 | | | |
| Date: | | | |
| Inspected by: | | | |
| Instructions: Check each item as yes (Y) or (N). Note items that require corrective action in the space provided Indicate a follow-up date and note when item has been corrected. | | | |
| | | Y | N |
| 1 | Aboveground Fuel Tanks (Gasoline & Diesel) | | |
| 2 | Maintenance Garage | | |
| 3 | Flammable & Combustible materials are properly stored inside? | | |
| 4 | Maintenance Garage Outside Box Trailer Storage | | |
| 5 | Vehicle Storage Garage | | |
| 6 | Quonsett Vehicle/Equipment Storage Garage | | |
| 7 | Salt Storage | | |
| 8 | Outside Storage Area | | |
| 9 | All Catch Basins | | |
| 10 | The Outfall | | |
| 11 | Site Perimeter Fencing | | |
| 12 | All Exterior Trash Bins Covered and Emptied Routinely | | |
| 13 | Liquid Recycling Tanks Secure and Emptied Routinely | | |
| 14 | Spill Kits Stocked and Secure | | |
| 15 | Other | | |
| Comments/Corrective Actions Required: | | | |

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Insert EML Form Here

APPENDIX 3

CTDEP SPILL REPORTING FORM

APPENDIX 4

MATERIAL INVENTORY

Material Inventory**Date of Materials Inspection: 03/19/2013**

| MATERIAL | PURPOSE/ DESCRIPTION/ TANK SIZE/ AST/UST | LOCATION | QUANTITY STORED | EXPOSED IN LAST 3 YEARS | | LIKELIHOOD OF CONTACT WITH STORMWATER. IF YES, DESCRIBE REASON. | PAST SIGNIFICANT SPILLS OR LEAKS | |
|------------------|---|---|--------------------|-------------------------------|----------|---|-------------------------------------|----------|
| | | | | YES | NO | | YES | NO |
| Diesel Fuel | 1: 4,000 gal AST | North side of "T" Building. | 0-4,000 gal | | X | Yes, possible exposure when filling the tank or dispensing, but performed under control of trained operator | | X |
| Gasoline | 1: 4,000 gal AST | North side of "T" Building. | 0-4,000 gal | | X | Yes, possible exposure when filling the tank or dispensing, but performed under control of trained operator | | X |
| Motor Oil | 3: 55 gal Drum | Inside Maintenance Garage | 0-165 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| Used Motor Oil | 1:5000 gal AST | West side of Vehicle Maintenance Bldg. | 0-500 gal | | X | Yes, only if spilled during transfer to outside fill pipe but performed under control of trained operator | | X |
| Used Anti-Freeze | 1:300 gal AST | West side of Vehicle Maintenance Bldg. | 0-300 gal | | X | Yes, only if spilled during transfer to outside fill pipe but performed under control of trained operator | | X |
| Used Oil Filters | 1:330 gal AST | West side of Vehicle Maintenance Bldg. | 0-330 gal | | X | Yes, only if spilled during transfer to outside fill pipe but performed under control of trained operator | | X |

Material Inventory**Date of Materials Inspection: 03/19/2013**

| MATERIAL | PURPOSE/ DESCRIPTION/ TANK SIZE/ AST/UST | LOCATION | QUANTITY STORED | EXPOSED IN LAST 3 YEARS | | LIKELIHOOD OF CONTACT WITH STORMWATER. IF YES, DESCRIBE REASON. | PAST SIGNIFICANT SPILLS OR LEAKS | |
|-------------------|---|--|--------------------|-------------------------------|----------|---|-------------------------------------|----------|
| | | | | YES | NO | | YES | NO |
| Hydraulic Fluid | 1: 55 gallon drum 5:5 gallon pails | Inside Maintenance Garage&PW Garage | 0- 80 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| ATF Fluids | 1: 55 gallon drum 4 cases of 1 gallon containers | Inside Maintenance Garage | 0-110 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| Radiator Fluid | 18: 1 gallon containers 1:55 gallon drum | Inside Maintenance Garage | 0- 20 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| Solvents Thinners | Containers | Inside Maintenance Garage&PW Garage | 0-25 gal | | X | Low Probability – Stored inside fire cabinet | | X |
| Paint | Containers | Inside Maintenance Garage&PW Garage | 0-25 gal | | X | Low Probability – Stored inside fire cabinet | | X |

Material Inventory**Date of Materials Inspection: 03/19/2013**

| MATERIAL | PURPOSE/ DESCRIPTION/ TANK SIZE/ AST/UST | LOCATION | QUANTITY STORED | EXPOSED IN LAST 3 YEARS | | LIKELIHOOD OF CONTACT WITH STORMWATER. IF YES, DESCRIBE REASON. | PAST SIGNIFICANT SPILLS OR LEAKS | |
|---------------|---|---------------------------------|--------------------|-------------------------------|----------|---|-------------------------------------|----------|
| | | | | YES | NO | | YES | NO |
| Gear oil | 3:55 gallon drum | Inside Maintenance Garage | 0- 165 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| Grease | 2:20 gallon drum 10 cases of tubes | | 0-60 gal | | X | No, work done inside building – floor drains connected to oil/grit separator and pumped to sanitary sewer | | X |
| Cold Patch | BULK | | 0-15 tons | | X | Stored outside under roof | | X |
| Stone (3/4") | BULK | | 0-80 tons | <input type="checkbox"/> | | Stored Exposed Outside | | X |
| Crushed Stone | BULK | | 150-250 CY | <input type="checkbox"/> | | Stored Exposed Outside | | X |
| Sand | BULK | | 50-100 CY | <input type="checkbox"/> | | Stored Exposed Outside | | X |
| | | | | | | | | |

Material Inventory**Date of Materials Inspection: 03/19/2013**

| MATERIAL | PURPOSE/ DESCRIPTION/ TANK SIZE/ AST/UST | LOCATION | QUANTITY STORED | EXPOSED IN LAST 3 YEARS | | LIKELIHOOD OF CONTACT WITH STORMWATER. IF YES, DESCRIBE REASON. | PAST SIGNIFICANT SPILLS OR LEAKS | |
|--------------------------------------|---|--|--------------------|-------------------------------|----------|---|-------------------------------------|----------|
| | | | | YES | NO | | YES | NO |
| | | | | | | | | |
| | | | | | | | | |
| Other Chemicals/shop supplies | 50: Various Size Cont. | Vehicle Maintenance Bldg. | 0-10 gal | | X | Low Potential | | X |
| Vehicle storage | Individual cars trucks | East end of yard | 0-10 | <input type="checkbox"/> | X | Stored Exposed Outside | | X |
| Equipment Storage | Individual Paving and Mowing Items | Various areas on perimeter fence | 0-15 | | X | Low Potential | | X |
| SALT STORAGE | | | | | | | | |
| SALT (Treated Sodium Chloride) | Tons | Salt Shed | 0- 500 C.Y. | | X | Low Potential | | X |

APPENDIX 5

LIST OF SIGNIFICANT (> 5 GALLONS)

SPILLS AND RELEASES

List of Significant (> 5 Gallons) Spills and Releases

Note: According to facility records and discussions with facility personnel there have been no spills/releases reported for this facility from October 1, 1989 to date.

| <i>Date</i> | <i>Spill/Release</i> | <i>Location (As Indicated On Site Map)</i> | <i>Description:</i> | | | | <i>Response Procedures:</i> | <i>Measures Taken to Prevent Reoccurrence</i> |
|-------------|--------------------------|--|-----------------------------|-----------------|-----------------------------|---------------|---------------------------------|---|
| | NONE REPORTED | | <i>Type of Material</i> | <i>Quantity</i> | <i>Source, If Known</i> | <i>Reason</i> | . | |
| | | | | | | | | |
| <i>Date</i> | <i>Spill/Release</i> | <i>Location (As Indicated On Site Map)</i> | <i>Description:</i> | | | | <i>Response Procedures:</i> | <i>Measures Taken to Prevent Reoccurrence</i> |
| | | | <i>Type of Material</i> | <i>Quantity</i> | <i>Source, If Known</i> | <i>Reason</i> | | |
| | | | | | | | | |
| <i>Date</i> | <i>Spill/Release</i> | <i>Location (As Indicated On Site Map)</i> | <i>Description:</i> | | | | <i>Response Procedures:</i> | <i>Measures Taken to Prevent Reoccurrence</i> |
| | | | <i>Type of Material</i> | <i>Quantity</i> | <i>Source, If Known</i> | <i>Reason</i> | | |
| | | | | | | | | |

APPENDIX 6

POTENTIAL POLLUTION SOURCES

Potential Pollution Sources**Report Date:**03/19/2013

| POTENTIAL SOURCE | ASSOCIATED POLLUTANTS | CURRENT PREVENTIVE PRACTICES | FUTURE PREVENTIVE PRACTICES |
|-------------------|----------------------------|--|---|
| Diesel Fuel | Petroleum | Tank has inherent secondary containment and is located on impervious surface Filling of tank under control of vendor or operator | Continue best management practices |
| Gasoline | Petroleum | Tank has inherent secondary containment and is located on impervious surface Filling of tank under control of vendor or operator | Continue best management practices |
| Motor Oil | Petroleum | Drums stored indoors on impervious surface with secondary containment | Continue best management practices add spill kit |
| Used Motor Oil | Petroleum | Tank on impervious surface with secondary containment | Continue best management practices add spill kit |
| Hydraulic Fluid | Petroleum | Drums stored indoors on impervious surface with secondary containment | Continue best management practices |
| ATF Fluid | Petroleum | Drums stored indoors on impervious surface with secondary containment | Continue best management practices |
| Radiator Fluid | Ethylene, propylene glycol | Drums stored indoors on impervious surface | Continue best management practices |
| Solvents Thinners | Solvent | Stored inside fire cabinet | Continue best management practices |
| Paint | Water/solvent/oil | Stored inside fire cabinet | Continue best management practices |

Potential Pollution Sources**Report Date:**03/19/2013

| POTENTIAL SOURCE | ASSOCIATED POLLUTANTS | CURRENT PREVENTIVE PRACTICES | FUTURE PREVENTIVE PRACTICES |
|-------------------------|----------------------------|---|--|
| Solvents Reducers | Solvent | Stored inside fire cabinet | Continue best management practices |
| Fueling Islands | Petroleum | Filling of vehicles under control of vendor or operator | Spill kits |
| Truck Loading/Unloading | Petroleum, antifreeze | Observation of areas for drippage, leaks, spills | Cover areas |
| Parts Cleaning | Solvents | Performed indoors on impervious surface with secondary containment | Use safer solvents |
| Vehicle washing | Detergents, oil & Grease | Performed within defined area draining to oil/grit separator and pumped to sanitary sewer | No outdoor cleaning near catch basins |
| Used Anti freeze | Ethylene, propylene glycol | Tank outdoors on impervious surface with secondary containment | Continue best management practices spill kit |
| | | | |
| | | | |
| | | | |
| | | | |

APPENDIX 7

STATE OF CONNECTICUT PERMIT FOR THE DISCHARGE OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITY

Issuance Date October 1, 2002
EFFECTIVE October 1, 2011

APPENDIX 8

APPLICATION

APPENDIX 9

SAMPLE RESULTS

APPENDIX 10

ROSTER AND TRAINING RECORDS

ROSTER

Team Manager: Town Manager: Anthony Salvatore

Team Leader: Director of Public Work: Louis Spina

Team Member: Chief Mechanic

Team Member: Working Foreman

Team Member: Town Engineer: Jon Harriman