

Draft MS4 Stormwater Annual Report

2018

Available for public comments

Please address all comments to

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by March 28th, 2019

MS4 General Permit
City of New Haven 2018 Annual Report
 Existing MS4 Permittee
 Permit Number GSM 000030
 [January 1, 2018 – December 31, 2018]

This report documents the City of New Haven's efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2018 to December 31, 2018.

Part I: Summary of Minimum Control Measure Activities

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

1.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
1-1 Implement public education and outreach	Ongoing	<ul style="list-style-type: none"> - Signage at green infrastructure (GI) installations - Outreach associated with installation of GI - Bike Tour of GI practices in New Haven - Promotion of GI and sustainable land use practices in Climate and Sustainability Framework 	Link to website, 8 signs installed, # of people reached, Link to Framework	Engineering	Ongoing	Continuing	Link to New Haven Climate and Sustainability Framework http://cityofnewhaven.com/gov/depts/engineering/sustainability.htm
1-2 Address education/outreach for pollutants of concern*	Ongoing	<ul style="list-style-type: none"> - Passed voluntary pesticide ban and developed and distributed associated pamphlet - Developed Mill River Watershed Plan 	Link to outreach pamphlet,	Engineering	Ongoing	Continuing	Link to City website and Green Haven brochure Link to Mill River Watershed Plan https://www.ctenvironment.org/what-we-do/saving-sound-

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

- Installation of bioswale signage in downtown locations to promote awareness of the purpose of these gardens and the issue of stormwater pollution
- Possible partnership with a youth arts program to design and install storm drain stenciling
- Possible partnership with non-profit to implement a litter prevention education project that includes installation of trash collectors at the end of three stormwater outfalls in Beaver Ponds (tributary to the West River).

1.3 Details of activities implemented to educate the community on stormwater

Program Element/Activity	Audience (and number of people reached)	Topic(s) covered	Pollutant of Concern addressed (if applicable)	Responsible dept. or partner org.
, Troup School, residences on West Park Ave in Edgewood neighborhood, and in front of residences in Newhallville neighborhood	8 signs installed reaching about 1000 students and their parents and teachers, and residents (about 12,000 in the two neighborhoods)	- Impact of impervious cover stormwater infiltration - Purpose of GI and how it works - Native plants		Engineering in partnership with Urban Resources Initiative and Save the Sound
Outreach associated with Downtown bioswale installations- flyers delivered to adjacent property owners, News Channel 8 coverage (TV and web), and informal conversations with construction crew	Adjacent property owners (66 downtown), Entire city and region with News Channel 8 coverage, 100 or so people that have inquired about installations while work being performed	- Impact of impervious cover - Purpose of GI and how it works		Engineering in partnership with Urban Resources Initiative and EMERGE, Inc
GI Bike Tour as part of International Arts and Ideas Festival. Visited multiple green infrastructure installations on both private and public properties	About 50 people attended the bike tour	-Impact of impervious cover -Purpose of GI, exposure to different types and scales of GI		Engineering in partnership with Neighborhood Housing Services

Inclusion of GI and sustainable land use practices in New Haven Climate and Sustainability Framework

All who live work and play in New Haven (100+ people) participated in creation of Framework, 1000's have been exposed to Framework through press, events, social media)

- Impact of impervious cover, fertilizers, pesticides
- Purpose of GI

Engineering

Passed voluntary pesticide ban in New Haven including creation and distribution of educational brochure covering sustainable land use practices
Development of Mill River Watershed Plan

Residents of New Haven

- Impact of pesticides, fertilizers

Pesticides, fertilizers (nitrogen and phosphorus)

Engineering Dept in conjunction with the Environmental Advisory Council

Participants in plan development (50+ people), outreach at events (100 people)

- Impact of impervious cover
- sources of pollutants to Mill River

- Bacteria, Nitrogen, Phosphorus

Connecticut Fund for the Environment, Save the Sound

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

2.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-1 Continue availability of Final Stormwater Management Plan to the public	Ongoing	SWMP available on website (see below 2.3)	Link to plan	Engineering	Ongoing	Completed	Website :- http://www.cityofnewhaven.com/gov/depts/engineering/stormwater.htm
2-2 Comply with public notice requirements for Annual Reports	Ongoing	Annual Report available on website (see below 2.3)	Link to report	Engineering	Feb 22, 2019	To be completed annually on Feb 15 th	Website :- http://www.cityofnewhaven.com/gov/depts/engineering/stormwater.htm

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

2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan to public	Y	July 2017	A hard copy is kept for public review at the Engineering Department's reception desk, Hall of Records, 200 Orange Street, New Haven. Additionally, an electronic version is published on the City's web site at:-

A hard copy is kept for public review at the Engineering Department's reception desk, Hall of Records, 200 Orange Street, New Haven.

2/22/19

Y

Availability of Annual Report announced to public

Additionally, an electronic version is published on the City's web site at:-

<http://cityofnewhaven.com/gov/depts/engineering/stormwater.htm>

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

3.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	Completed	IDDE protocol researched and written in early 2018	IDDE Protocol Document	Engineering	Jul 1, 2018	March 2, 2018	The document is considered to be a 'living document', in as far as it will be modified over time as new problems are encountered, and as experience is gained
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	Completed	Minor updating when errors or omissions have been detected during field visits	(1) Excel spreadsheet listing all outfalls, locations and type of construction. (2) A photo log of all outfalls with condition data. (3) 1" to 80" plans showing all outfalls and listing their drainage basins.	Engineering	Jul 1, 2019	In stages between 2004 and 2009	The City's outfalls drain to the Quinnipiac, Mill River, West River, and New Haven Inner and Outer harbor. All are waters impaired by bacteria, nitrogen and phosphorus. A water testing program is underway to determine priorities.

3-3 Implement citizen reporting program	Completed	Monitoring of the "See Click-Fix" web site for citizen reports, and rectification of the problem	"See Click-Fix" website	All City Departments	Jul 1, 2017	Circa 2010	Citizen reports cover a large number of issues affecting stormwater run-off, from blocked or damaged catch basins through to illegal dumping. Appendix 1 includes a typical "See Click-Fix" posting
3-4 Establish legal authority to prohibit illicit discharges	Completed	No enforcement actions have been taken during 2018	Title III Chapter 26 Code of Ordinances	Engineering and Corporation Counsel	Jul 1, 2018	June 6, 2016	Can be viewed at :- https://library.municode.com/ct/new_haven/codes/code_of_ordinances?nodeId=TITIIIICOGGEOR_CH26STDI&showChanges
3-5 Develop record keeping system for IDDE tracking	Completed	Review of CCTV footage of storm drains to detect any illicit connections	70,000 linear feet of CCTV footage per year	Engineering	Jul 1, 2017	Not known	CCTV footage is kept on a hard drive with all pipe lengths uniquely numbered. This is backed up by drawings illustrating the pipe networks. For each outfall a register is kept of any potential problem areas.
3-6 Address IDDE in areas with pollutants of concern			Prompt removal of illicit connection	Engineering	Not specified		Illicit connections into the storm system will be removed when found. To date the CCTV inspections have found no illicit connections
3-7 CCTV of storm lines to search for illicit connections	On-going	19,300 ft of storm line CCTVed, but not yet reviewed	70,000 linear feet of CCTV footage per year	Engineering		Continuing	Contractor had equipment problems and only completed one third of the work instructed

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

The CCTV program has been in operation for approximately three years. Unfortunately the contractor undertaking this work has not accurately reported the locations surveyed. Work is on-going to accurately locate the footage, and review it for illicit connections. To date approximately 20,000 linear feet have been reviewed, with no definitive illicit connections located. There is a backlog of approximately 60,000 to 70,000 linear feet to be reviewed, and this will be completed prior to any further CCTV work. At the present time it is unlikely that any further CCTV work will be undertaken during 2019.

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

Date of Report **Location / suspected source** **Response taken**

No Reports Received

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

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
E553064, N166878 Long Wharf Drive CB 8792	10/26/19 5 mins	MS4	3 gallons	Cooking oil dumped in catch basin by food truck	Vacuumed out and disposed of at registered facility	None

SSO response and record keeping is undertaken by the Greater New Haven Water Pollution Authority

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

1. All illicit discharges reported to date have been used cooking oil which has been dumped in catch basins by food trucks or street vendors. The catch basins are vacuumed out as soon as possible after the incident. As these incidents are fairly rare, only occurring every eighteen months or so, there has been no formal tracking.
2. The tracking system for illicit sanitary connections is as described in section 3.5 above. To date no such connections have been detected.

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

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known

There are no precise records, but it is believed there are only 10 to 20 septic systems left in the City. In 2018 there were no reports of failures

3.7 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	260
Estimated or actual number of interconnections	See below
Outfall mapping complete	100%
Interconnection mapping complete	100%
System-wide mapping complete (detailed MS4 infrastructure)	100%
Outfall assessment and priority ranking	See below
Dry weather screening of all High and Low priority outfalls complete	See below
Catchment investigations complete	See below
Estimated percentage of MS4 catchment area investigated	Approx 10 - 15%
1. The number of outfalls currently stands at 260 as it includes all outlets in the city, including those serving DOT highways and properties. As these will be covered by the DOT permit from July 1 st , 2019, the total for City owned structures is expected to drop to about 80.	
2. Interconnections with adjacent municipalities are immaterial, amounting to short lengths of pipe and two or three catch basins. Within the city there are numerous interconnections between the City's drainage infrastructure, and that owned by DOT. The City's mapping includes both City and DOT infrastructure.	
3. As the vast majority of the City's outfalls are either completely or partially submerged dry weather screening is problematic. In consequence, only wet weather sampling is done, and all tests are performed in laboratories.	
4. Catchment investigation by testing is on-going, and it is estimated that approximately 10 to 15% of the City (by area) has been tested during 2018.	

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

There is no formal training system in place at present as all IDDE work to date has been undertaken by registered professional engineers. The main reference document for this work is "Illicit Discharge Detection & Elimination" by the Center for Watershed Protection.

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

4.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MSA general permit	Completed	See 4.2 below		City Plan	Jul 1, 2019	Sept 19, 2011	
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	On-going	See 4.2 below	62 Site plan review applications in 2018	City Plan Engineering Building Dept	Jul 1, 2017	Since 2004	
4-3 Review site plans for stormwater quality concerns	On-going	See 4.2 below	62 Site plan review applications in 2018	Engineering	Jul 1, 2017	Since 2004	
4-4 Conduct site inspections	On-going	See 4.2 below	Records have not been kept, but 150 inspections is considered a good estimate	Building Dep Engineering	Jul 1, 2017	Since 2004	

4-5 Implement procedure to allow public comment on site development	On-going	See 4.2 below	Monthly City Plan Commission meetings	City Plan Commission	Jul 1, 2017	Since 2004
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	On-going	See 4.2 below	This is part of the Site plan application process	City Plan	Jul 1, 2017	Since 2004

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

The City Plan Commission reviews all development plans prior to approval. There are monthly meetings at which commissioners review developments and approve them, or otherwise. These meetings are open to all, and members of the public can comment on any aspect of a development. Various city departments review the plans prior to City Plan Commission review, and there are bi-monthly co-ordination meetings between the departments involved. In the case of stormwater, input is from City Plan, the Engineering Department, the Building Department, and the Greater New Haven Water Pollution Control Authority. As required by Section 60 of the Zoning Code, the developer's engineer submits a Stormwater Management Plan addressing compliance with the City's ordinances, including Soil Erosion and Sediment Control plans. A typical report is included as Appendix 2. As part of the approval process, City Plan prepares a project specific report indicating any special requirements. A typical example which has stormwater related requirements is included as Appendix 3. A building permit is not issued until all the conditions of an approval are met. Site inspections by Building Department staff during construction ensure SEESC controls are in place, and that all work is in compliance with the approved design, including stormwater elements, prior to the issuance of a Certificate of Occupancy.

Sections 57, 58 and 60 of Article VI of the City's code of ordinances are the mechanism by which the requirements of the MS4 permit are met. They include low impact development requirements and the retention on site of one inch of rainfall. They can be viewed at the following web address :-

https://library.municode.com/ct/new_haven/codes/zoning?nodeId=Z00R_ARTVIOTDI

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

5.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	Completed	See 4.2 above	Section 60 of the Zoning Ordinance	City Plan	Jul 1, 2021	Sept 19, 2011	

5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	On-going	See 4.2 above	50 stormwater management plans submitted for development projects during 2018	City Plan	On-going
	Completed	None	None	Engineering	
5-3 Identify retention and detention ponds in priority areas					There are no known retention / detention structures under the City's jurisdiction
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	Not necessary at the present time			Engineering	On-going
	On-going	Catchments for 10 outfalls have been delineated, and the City's GIS system has been used to provide DCIA for one catchment	Completion	Engineering	On-going
5-5 DCIA mapping					There are no known structures of these types under the City's jurisdiction.
5-6 Address post-construction issues in areas with pollutants of concern					Not specified

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

5.3 Post-Construction Stormwater Management reporting metrics

Metrics

Baseline (2012) Directly Connected Impervious Area (DCIA)

3,155 acres

There have been DCIA disconnections since 2011 when Section 60 of the Zoning Ordinance was adopted. As this was prior to the 2017 MS4 Permit records were not kept. It is intended that records will be researched, and the amount of work already done will be quantified. The results will appear in a future Annual Report

DCIA disconnected (redevelopment plus retrofits)

Retrofits completed

Not known at present

DCIA disconnected

Not known at present

Estimated cost of retrofits

Not known. As many retrofits are incorporated in private developments the true costs will probably never be known

Detention or retention ponds identified

There are no known detention or retention ponds under the City's jurisdiction

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

The 2012 imperviousness layer was downloaded from the CT ECO website. This layer was used to calculate the imperviousness within the combined sewer areas of New Haven so that it can be subtracted out from the total impervious acreage. After subtracting out State Roads and Combined Sewer impervious cover from New Haven's total impervious acreage (according to UCONN's MS4 map), the total impervious cover within MS4 areas in New Haven is 3,809.7 acres. This amounts to 38% impervious after adjusting the City's total acreage minus the combined sewer and state road acreage (10,015.9 acres). Using the methodology developed by EPA for Massachusetts, the City was conservatively assigned as 'Highly Connected' and the associated equation was used to convert the total imperviousness percentage to DCIA percentage. The DCIA percentage is 31.5% or 3,155 acres.

In the future, the City plans to delineate watersheds for each of its outfalls at which time the DCIA for each watershed will be calculated. The same methodology as above will be applied. There may be some difference in the baseline DCIA due to the assignment of connectivity levels on the watershed rather than city-wide scale. Many neighborhoods outside of the downtown area are likely to be assigned as 'Average' rather than 'Highly Connected.' The City is still in the process of compiling the impervious acreage that has been disconnected due to redevelopment and retrofits and will be quantified by next annual report.

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

6.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-1 Develop/implement formal employee training program	On-going	Annual training of Public Works and Parks Dept operatives	Annual training of Public Works and Parks Dept operatives	Public Works Parks Dept	Jul 1, 2017	Continuing	Training materials in the form of presentation slides are available
6-2 Implement MS4 property and operations maintenance	On-going	Pavement sweeping and trash removal from the Public Works Garage, the Refuse Vehicle Garage, and the transfer Station sites	Meeting target pollutant levels in the relevant DEEP general permit	Public Works	Jul 1, 2018	Continuing	Facilities covered by DEEP Industrial Discharge General permits GSI000800, GSI001690 and GSI002097
6-3 Implement coordination with interconnected MS4s		None	See 3.7 above	Engineering		Not specified	
6-4 Develop/implement program to control other sources of pollutants to the MS4		None		Engineering		Not specified	There are no known sources of other pollutants to the MS4
6-5 Evaluate additional measures for discharges to impaired waters*		None		Engineering		Not specified	In previous years ABTECH pollutant absorbing sponges were installed at the Public Works Garage, and although found to be effective they were prohibitively expensive
6-6 Track projects that disconnect DCIA	On-going	The Site Plan review process as described in 4.2 above has been ongoing, and data has been included in the development reports, an example of which is included in Appendix 3	Spread sheet listing all developments since 2004 with DCIA reductions	Engineering	Jul 1, 2017	Work is in progress on the 2017 and 2018 developments to quantify the DCIA already achieved.	It is intended, dependent on staff availability, to track projects back to 2011.

6-7 Implement infrastructure repair/rehab program	On-going	Approximately \$250,000 spent on minor repair and maintenance of stormwater infrastructure, mostly on catch basins and piping None	Keeping all infrastructure in a state of good repair	Engineering	Jul 1, 2021	Continuing
6-8 Develop/implement plan to identify/prioritize retrofit projects	None	Developing methodology for tracking new/re-development disconnection, retrofitting streets in downtown with ROW bioswales	Acres of impervious area disconnected	Engineering	Jul 1, 2020	Continuing
6-9 Implement retrofit projects to disconnect 2% of DCIA	On-going	All streets within the City are swept 4 or 5 times annually between April and November	Visually clear of trash, dust, and leaves at all times	Public Works	Jul 1, 2017	Continuing
6-10 Develop/implement street sweeping program	On-going	6024 routine cleanings of catch basins, 115 emergency cleanings when either blocked or non-functioning, and 1960 linear feet of storm line jetting to remove blockages	Clean every catch basin once every two years	Engineering	Jul 1, 2020	Continuing
6-11 Develop/implement catch basin cleaning program	On-going	Application of chloride liquid de-icer and sand/salt as required.	Maintenance of safe movement of traffic	Public Works	Jul 1, 2018	Continuing
6-12 Develop/implement snow management practices		No specific metrics available				

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

1. Continued street sweeping – 4 or 5 times during the year
2. Continued catch basin cleaning – Approx 4,000
3. Spill response – As required
4. Illicit dumping response – As required
5. Litter removal in the downtown area and city parks – As required
6. Continued construction of bioswales throughout the Downtown Storm Sewershed (that ultimately drains to the Inner Harbor)

6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	
Employee training provided for key staff	No data available from Public Works
Street sweeping	
Curb miles swept	No data available from Public Works
Volume (or mass) of material collected	No data available from Public Works
Catch-basin-cleaning	
Total catch basins in priority areas	Approx 8,500
Total catch basins in MS4	Approx 8,500
Catch basins inspected	4024
Catch basins cleaned	4024
Volume (or mass) of material removed from all catch basins	Approx 67,000 Cu Ft
Volume removed from catch basins to impaired waters (if known)	Approx 67,000 Cu Ft
Snow management	
Type(s) of deicing material used	No data available from Public Works
Total amount of each deicing material applied	No data available from Public Works
Type(s) of deicing equipment used	No data available from Public Works
Lane-miles treated	No data available from Public Works
Snow disposal location	No data available from Public Works
Staff training provided on application methods & equipment	No data available from Public Works
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	

Reduction in application of fertilizers (since start of permit)

No data available
from Parks Dept

Reduction in turf area (since start of permit)

No data available
from Parks dept

~~Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)~~

Cost of mitigation actions/retrofits

No data available
from Parks Dept

6.4 Catch basin cleaning program

Provide any updates or modifications to your catch basin cleaning program

No changes. Expect to clean 3,500 to 4,000

6.5 Retrofit program

Briefly describe the Retrofit Program identification and prioritization process, the projects selected for implementation, the rationale for the selection of those projects --and the total DCIA to be disconnected upon completion of each project. [Provide information if available in 2018 report. Section to be completed for the 2019 Annual Report.]

Currently, in addition to the disconnection taking place as part of new and major re-development projects, the City is also retrofitting streets throughout the Downtown Storm Sewershed with right-of-way (ROW) bioswales. 69 bioswales have been installed thus far and up to 200 bioswales will be installed over the next 12-24 months. These bioswales are in addition to the 40 green infrastructure installations that have been installed within the ROW since 2013. The City will continue to incorporate green infrastructure into all its projects as applicable. Quantifying the DCIA associated with these installations will occur over the next year.

Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection in future years. [Provide information if available in 2018 report. Section to be completed for the 2019 Annual Report.]

To be reported on more thoroughly in a future next annual report once more tracking and quantifying of DCIA has been completed.

Describe plans for continuing the Retrofit program beyond this permit term with the goal to disconnect 1% DCIA annually over the next 5 years. [Provide information if available in 2018 report. Section to be completed for the 2019 Annual Report.]

See above

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

1. Impaired waters investigation and monitoring program

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

Nitrogen/ Phosphorus Bacteria Mercury Other Pollutant of Concern

1.2 Describe program status.

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

The City has monitored water quality per the 2004 permit since its inception, and has always had bacteria, nitrogen and phosphorus levels above target levels, sometimes significantly so. The City was audited by the EPA during 2014 and 2016, at which times they undertook PPCP testing at the outfalls monitored by the City. These indicated that sewage was entering the storm system. The EPA test results were submitted to DEEP with the 2017 annual report. City staff have always believed that the high levels of bacteria are due to wildlife, which has probably contributed to the high levels of nitrogen also. In consequence the City undertook PPCP sampling of gutter flows in to catch basins. Several of the parameters in the PPCP spectrum had similar levels to those previously found at outfalls, reinforcing the City's opinion that the problems at the outfalls were due to contamination by animal excrement rather than sanitary sewer cross connections. The City has had an extensive sewer separation program in place for the last twenty years, and so far the CCTV review has found no illicit connections. No doubt some will be found in due course as the CCTV program proceeds.

The water testing undertaken during 2018 consisted monitoring at both the catch basins and outfalls, all samples on a network being collected within an hour of each other, so the test results would be a reasonably good comparison of what is going into the system with what is coming out. A review of the results available so far indicates that the stormwater entering at the catch basins is as polluted as that leaving the outfalls. Using the term "outfall" here is not fully correct as they are generally submerged. The sampling is at a close by upstream manhole.

Unfortunately the 2018 testing was not completed to the extent hoped for. As it is highly dependent on subventions, The City of New Haven had to curtail spending to prevent cash flow problems when the State did not set a budget in 2017. In consequence the contract for the sampling was not issued until early 2018, with work concluding on June 30th, 2018, when the City's fiscal year closes. There were few storms during this period, so little was achieved. A further contract was let in September 2018 for work up until June 30th, 2019, and progress has been good so far.

2018 test results are included in Section 2.1 below, and also in Appendix 3 with inflow data at catch basins. Going forward the City will sample at all outfalls and typical catch basins on selected pipe networks. All sampling is "Wet Weather", and the vast majority of tests are undertaken at a laboratory. The sampling and testing at catch basins can be looked on as the "follow up Investigation" of the situation at the outfall. Work will progress in the ranking order as indicated in Part iii Table 1 below. Delineation of outfall catchments, the calculation of impervious areas, and the estimation of DCIA will proceed in the same order.

The following parameters have been and will be tested at all outfalls and selected catch basins :-

1. E-Coli (Col/100ml) *
2. Total coliform
3. Fecal coliform
4. Enterococci
5. Ammonia (mg/l) *
6. Chlorine
7. Conductivity (umhos) *
8. Salinity
9. Surfactants
10. pH (SU) *
11. Hardness (mg/l) *
12. Oil and grease (mg/l) *
13. Chemical oxygen demand (mg/l) *
14. Turbidity (NTU) *

15. Total suspended solids (mg/l) *
16. Total phosphorus (mg/l) *
17. Total Kjeldahl Nitrogen (mg/l) *
18. Nitrate plus nitrite Nitrogen (mg/l) *
19. Temperature of sample *
20. pH (SU) of uncontaminated rainfall *
21. Boron (mg/l)

The items marked * are the same parameters tested under the MS4 permit in place between 2004 and 2017. They are continuing to be monitored as they give a general indication as to how dirty the storm discharges are, and it is hoped a database built up over many years will indicate general improvements.

Starting mid-2018 all bacteria samples were split to be tested at two separate and independent laboratories as a check on their accuracy.

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

2.1 Screening data

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

Outfall ID	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
O-180 (5200-00)	6/21/18	Bacteria	E. coli 616 MPN/100mls	Phoenix	Yes
			Enterococci >24,200 MPN/100mls	Phoenix	Yes
			Fecal Coliform 605 MPN/100mls	Phoenix	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			Nitrogen	Total N 3.08 mg/l	Phoenix
	Phosphorus	Total P 0.123 mg/l	Phoenix	No	
O-119 (5305-00)	6/28/18	Bacteria	E.Coli 3,450 MPN/100mls	Phoenix	Yes

			Enterococci 12,000 MPN/100mls	Phoenix	Yes
			Fecal Coliform 4,110 MPN/100mls	Phoenix	Yes
			Total Coliform >242,000 MPN/100mls	Phoenix	Yes
		Nitrogen	Total N 3.48 mg/l	Phoenix	Yes
		Phosphorus	Total P 0.545 mg/l	Phoenix	Yes
O-11 (5305-00)	11/13/18	Bacteria	E Coli 609 MPN/100mls 200 MPN/100mls	Phoenix ECL	Yes
			Enterococci 602 MPN/100mls 310 MPN/100mls	Phoenix ECL	Yes
			Fecal Coliform 383 MPN/100mls 300 MPN/100mls	Phoenix ECL	Yes
			Total Coliform 17,300 MPN/100mls 17,250 MPN/100mls	Phoenix ECL	Yes
		Nitrogen	Total N 0.66 mg/l	Phoenix	No
		Phosphorus	Total P 0.076 mg/l	Phoenix	No
O-7 (5305-00)	11/13/18	Bacteria	E Coli >24,200 MPN/100mls 241,960 MPN/100mls	Phoenix ECL	Yes Yes
			Enterococci >24,200 MPN/100mls >241,960 MPN/100mls	Phoenix ECL	Yes Yes
			Fecal Coliform >24,200 MPN/100mls 48,840 MPN/100mls	Phoenix ECL	Yes Yes
			Total Coliform >24,200 MPN/100mls >241,960 MPN/100mls	Phoenix ECL	Yes Yes

		Nitrogen	Total N 14.69 mg/l	Phoenix	Yes
		Phosphorus	Total P 1.34 mg/l	Phoenix	Yes
O-10 (5305-00)	12/28/18	Bacteria	E Coli >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
			Enterococci >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
			Fecal Coliform >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
		Nitrogen	Total N 16.67 mg/l	Phoenix	Yes
		Phosphorus	Total P 1.76 mg/l	Phoenix	Yes
O-12 (5305-00)	11/13/18	Bacteria	E Coli 5,480 MPN/100mls	Phoenix	Yes
			5,040 MPN/100mls	ECL	Yes
			Enterococci 5,170 MPN/100mls	Phoenix	Yes
			6,770 MPN/100mls	ECL	Yes
			Fecal Coliform 1,860 MPN/100mls	Phoenix	Yes
			1,560 MPN/100mls	ECL	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			198,630 MPN/100mls	ECL	Yes
		Nitrogen	Total N 0.44 mg/l	Phoenix	No

		Phosphorus	Total P 0.229 mg/l	Phoenix	No
O13 (5305-00)	12/28/18	Bacteria	E Coli >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
			Enterococci >24,200 MPN/100mls	Phoenix	Yes
			61,310 MPN/100mls	ECL	Yes
			Fecal Coliform >24,200 MPN/100mls	Phoenix	Yes
			155,310 MPN/100mls	ECL	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
		Nitrogen	Total N 17.49mg/l	Phoenix	Yes
		Phosphorus	Total P 2.02mg/l	Phoenix	Yes
O-14 (5305-00)	11/13/18	Bacteria	E Coli 3,450 MPN/100mls	Phoenix	Yes
			6,310 MPN/100mls	ECL	Yes
			Enterococci 2,280 MPN/100mls	Phoenix	Yes
			1,870 MPN/100mls	ECL	Yes
			Fecal Coliform 588 MPN/100mls	Phoenix	Yes
			630 MPN/100mls	ECL	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			86,640 MPN/100mls	ECL	Yes
		Nitrogen	Total N 0.92 mg/l	Phoenix	No

		Phosphorus	Total P 0.278 mg/l	Phoenix	No
O-41 (5305-00)	12/28/18	Bacteria	E Coli		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
			Enterococci		
			>24,200	Phoenix	Yes
			MPN/100mls		
			92,080	ECL	Yes
			MPN/100mls		
Fecal Coliform					
>24,200	Phoenix	Yes			
MPN/100mls					
>241,960	ECL	Yes			
MPN/100mls					
Total Coliform					
>24,200	Phoenix	Yes			
MPN/100mls					
>241,960	ECL	Yes			
MPN/100mls					
		Nitrogen	Total N 11.49 mg/l	Phoenix	Yes
		Phosphorus	Total P 1.33 mg/l	Phoenix	Yes
O-46 (5305-00)	12/21/18	Bacteria	E Coli		
			637 MPN/100mls	Phoenix	Yes
			410 MPN/100mls	ECL	Yes
			Enterococci		
			2,280 MPN/100mls	Phoenix	Yes
			1,990MPN/100mls	ECL	Yes
			Fecal Coliform		
			197 MPN/100mls	Phoenix	Yes
			200 MPN/100mls	ECL	Yes
			Total Coliform		
9,800 MPN/100mls	Phoenix	Yes			
8,420 MPN/100mls	ECL	Yes			
		Nitrogen	Total N 0.42 mg/l	Phoenix	No
		Phosphorus	Total P 0.13 mg/l	Phoenix	No
O-47 (5305-00)	12/21/18	Bacteria	E Coli		
			9,140 MPN/100mls	Phoenix	Yes
			3,360 MPN/100mls	ECL	Yes
Enterococci					
3,870 MPN/100mls	Phoenix	Yes			

			1,580 MPN/100mls	ECL	Yes
			Fecal Coliform		
			5,170 MPN/100mls	Phoenix	Yes
			1,610 MPN/100mls	ECL	Yes
			Total Coliform		
			10,100 MPN/100mls	Phoenix	Yes
			13,540 MPN/100mls	ECL	Yes
		Nitrogen	Total N 0.72 mg/l	Phoenix	No
		Phosphorus	Total P 0.161 mg/l	Phoenix	No
O-57 (5305-00)	12/28/18	Bacteria	E Coli		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
			Enterococci		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
			Fecal Coliform		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
			Total Coliform		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
		Nitrogen	Total N 32.24 mg/l	Phoenix	Yes
		Phosphorus	Total P 4.09 mg/l	Phoenix	Yes
O-58 (5305-00)	12/28/18	Bacteria	E Coli		
			>24,200	Phoenix	Yes
			MPN/100mls		
			>241,960	ECL	Yes
			MPN/100mls		
			Enterococci		
			>24,200	Phoenix	Yes
			MPN/100mls		
			81,640	ECL	Yes
			MPN/100mls		
			Fecal Coliform		
			>24,200	Phoenix	Yes
			MPN/100mls		

			>241,960 MPN/100mls	ECL	Yes
			Total Coliform >24,200 MPN/100mls	Phoenix	Yes
			>241,960 MPN/100mls	ECL	Yes
		Nitrogen	Total N 26.01 mg/l	Phoenix	Yes
		Phosphorus	Total P 2.96 mg/l	Phoenix	Yes
O-66 (5305-00)	11/13/18	Bacteria	E Coli 3,080 MPN/100mls 2,350 MPN/100mls	Phoenix ECL	Yes Yes
			Enterococci 2,190 MPN/100mls 1,350 MPN/100mls	Phoenix ECL	Yes Yes
			Fecal Coliform 1,480 MPN/100mls 1,610 MPN/100mls	Phoenix ECL	Yes Yes
			Total Coliform >24,200 MPN/100mls 61,310 MPN/100mls	Phoenix ECL	Yes Yes
		Nitrogen	Total N 0.49 mg/l	Phoenix	No
		Phosphorus	Total P 0.182 mg/l	Phoenix	No
O-68 (5305-00)	12/28/18	Bacteria	E Coli 30 MPN/100mls 100 MPN/100mls	Phoenix ECL	No No
			Enterococci 249 MPN/100mls 8,600 MPN/100mls	Phoenix ECL	No Yes
			Fecal Coliform 20 MPN/100mls 100 MPN/100mls	Phoenix ECL	No No
			Total Coliform 13,000 MPN/100mls 5,810 MPN/100mls	Phoenix ECL	Yes Yes
		Nitrogen	Total N 0.95 mg/l	Phoenix	No
		Phosphorus	Total P 0.07 mg/l	Phoenix	No

O-87 (5305-00)	12/28/18	Bacteria	E Coli		
			30 MPN/100mls	Phoenix	No
			100 MPN/100mls	ECL	No
			Enterococci		
			249 MPN/100mls	Phoenix	No
			8,600 MPN/100mls	ECL	Yes
			Fecal Coliform		
			20 MPN/100mls	Phoenix	No
			100 MPN/100mls	ECL	No
			Total Coliform		
13,000	Phoenix	Yes			
MPN/100mls					
5,810	ECL	Yes			
MPN/100mls					
Nitrogen	Total N	24.37 mg/l	Phoenix	No	
Phosphorus	Total P	0.07 mg/l	Phoenix	No	
O-88 (5305-00)	12/28/18	Bacteria	E Coli		
			591 MPN/100mls	Phoenix	Yes
			520 MPN/100mls	ECL	Yes
			Enterococci		
			471 MPN/100mls	Phoenix	Yes
			1,100 MPN/100mls	ECL	Yes
			Fecal Coliform		
			637 MPN/100mls	Phoenix	Yes
			200 MPN/100mls	ECL	Yes
			Total Coliform		
>24,200	Phoenix	Yes			
MPN/100mls					
30,760	ECL	Yes			
MPN/100mls					
Nitrogen	Total N	0.826 mg/l	Phoenix	Yes	
Phosphorus	Total P	0.105 mg/l	Phoenix	No	
O-89 (5305-00)	12/21/18	Bacteria	E Coli		
			7,700 MPN/100mls	Phoenix	Yes
			9,590 MPN/100mls	ECL	Yes
			Enterococci		
			5,480 MPN/100mls	Phoenix	Yes
			5,540 MPN/100mls	ECL	Yes
			Fecal Coliform		
			2,610 MPN/100mls	Phoenix	Yes
			2,980 MPN/100mls	ECL	Yes

			Total Coliform		
			>24,200	Phoenix	Yes
			MPN/100mls		
			46,110	ECL	Yes
			MPN/100mls		
		Nitrogen	Total N 0.72 mg/l	Phoenix	No
		Phosphorus	Total P 0.133 mg/l	Phoenix	No
O-121 (5302-00)	12/21/18	Bacteria	E Coli		
			708 MPN/100mls	Phoenix	Yes
			520 MPN/100mls	ECL	Yes
			Enterococci		
			1,620 MPN/100mls	Phoenix	Yes
			1,580 MPN/100mls	ECL	Yes
			Fecal Coliform		
			288 MPN/100mls	Phoenix	Yes
			310 MPN/100mls	ECL	Yes
			Total Coliform		
			17,300 MPN/100mls	Phoenix	Yes
			11,450 MPN/100mls	ECL	Yes
		Nitrogen	Total N 0.72 mg/l	Phoenix	No
		Phosphorus	Total P 0.113 mg/l	Phoenix	No
O-132 (5302-00)	12/21/18	Bacteria	E Coli		
			12,000 MPN/100mls	Phoenix	Yes
			7,490 MPN/100mls	ECL	Yes
			Enterococci		
			2,190 MPN/100mls	Phoenix	Yes
			630 MPN/100mls	ECL	Yes
			Fecal Coliform		
			1,260 MPN/100mls	Phoenix	Yes
			1,100 MPN/100mls	ECL	Yes
			Total Coliform		
			19,900 MPN/100mls	Phoenix	Yes
			18,600 MPN/100mls	ECL	Yes
		Nitrogen	Total N 0.85 mg/l	Phoenix	No
		Phosphorus	Total P 0.061 mg/l	Phoenix	No
O-138 (5302-00)	12/21/18	Bacteria	E Coli		
			171 MPN/100mls	Phoenix	No

	100 MPN/100mls	ECL	No
	Enterococci		
	554 MPN/100mls	Phoenix	Yes
	1,630 MPN/100mls	ECL	Yes
	Fecal Coliform		
	158 MPN/100mls	Phoenix	No
	100 MPN/100mls	ECL	No
	Total Coliform		
	>24,200	Phoenix	Yes
	MPN/100mls		
	77,010 MPN/100mls	ECL	Yes
Nitrogen	Total N 1.19 mg/l	Phoenix	No
Phosphorus	Total P 0.135 mg/l	Phoenix	No

2.2 Credit for screening data collected under 2004 permit

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

Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
O-70 (5305-00)	Various dates between 2005 and 2016.	Bacteria E-coli 15 samples in total	Best 60 Worst 25,994 Average 6,336 (MPN/100mls)	Various Labs	Yes
		Total Nitrogen 13 samples in total	Best 1.22 Worst 5.36 Average 2.46 (mg/l)		
		Total Phosphorus 13 samples in total	Best 0 Worst 0.42 Average 0.19 (mg/l)		
O-109 (5000-48)	Various dates between 2005 and 2016.	Bacteria E-coli 14 samples in total	Best 228 Worst 30,100 Average 4,815 (MPN/100mls)	Various Labs	Yes
		Total Nitrogen 13 samples in total	Best 1.66 Worst 6.25 Average 3.09 (mg/l)		
		Total Phosphorus	Best 0		

O-147 (5000-48)	Various dates between 2005 and 2016.	13 samples in total Nitrogen	Worst 0.90 Average 0.44 (mg/l)	Various Labs	Yes
		Bacteria E-coli 15 samples in total	Best 4 Worst 29,700 Average 5,100 (MPN/100mls)		
		Total Nitrogen 13 samples in total	Best 0.16 Worst 6.13 Average 3.12 (mg/l)		
O-156 (5200-00)	Various dates between 2005 and 2016	Total Phosphorus 13 samples in total Nitrogen	Best 0 Worst 3.6 Average 0.54 (mg/l)	Various Labs	Yes
		Bacteria E-coli 15 samples in total	Best 10 Worst >24,200 Average 3,051 (MPN/100mls)		
		Total Nitrogen 13 samples in total	Best 0.0 Worst 26.45 Average 4.30 (mg/l)		
O-249 (5200-00)	Various dates between 2005 and 2016	Total Phosphorus 13 samples in total Nitrogen	Best 0.08 Worst 1.70 Average 0.72 (mg/l)	Various Labs	Yes
		Bacteria E-coli 15 samples in total	Best 90 Worst 36,100 Average 4,497 (MPN/100mls)		
		Total Nitrogen 13 samples in total	Best 0.22 Worst 4.47 Average 2.30 (mg/l)		
O-253 (5200-00)	Various dates between 2005 and 2016	Total Phosphorus 13 samples in total Nitrogen	Best 0.11 Worst 2.57 Average 0.59 (mg/l)	Various Labs	Yes
		Bacteria E-coli 15 samples in total	Best 10 Worst >24,200 Average 5,888 (MPN/100mls)		
		Total Nitrogen 13 samples in total	Best 0.19 Worst 4.47 Average 3.04 (mg/l)		
		Total Phosphorus 13 samples in total Nitrogen	Best 0.0 Worst 0.66 Average 0.30		

(mg/l)

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

Provide the following information for outfalls exceeding the pollutant threshold.

Outfall	Status of drainage area investigation	Control measure implementation to address impairment
O-180 (5200-00)	Dry weather testing was attempted, but there was no flow in the network. It was subsequently CCTVed throughout, and no illicit connections were detected. Finally, stormwater flowing into some of its catch basins was tested during the same storm event as the outfall. Pollutant levels at the catch basins were of the same order of magnitude as those at the outfall.	No control measures have been implemented, as the high pollutant levels are believed to be caused by wildlife in the area.

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

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

Outfall	Sample Date	Parameter(s)	Results	Name of Laboratory (if used)
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No dry weather screening has been undertaken to date

2.2 Wet weather sample and inspection data

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

Outfall / Interconnection ID	Sample date	Ammonia Mg/l	Chlorine Mg/l	Conductivity Umhos/cm	Salinity ppt	E. coli or Enterococcus MPN/100mls	Surfactants Mg/l	Water Temp	Pollutant of concern
O-180	6/21/18	0.08	<0.02	678	<0.5	See above	<0.05	Not recorded	Bacteria N P
O-119	6/28/18	0.42	<0.02	112	<0.5	See above	0.67	Not recorded	Bacteria N P
O-11	11/13/18	0.17	<0.02	186	<0.5	See above	0.09	10.2	Bacteria N P
O-7	11/13/18	5.14	<0.02	505	<0.5	See above	0.86	16	Bacteria N P
O-10	12/28/18	3.64	<0.02	678	<0.5	See above	0.25	12.2	Bacteria N P
O-12	11/13/18	<0.05	<0.02	106	<0.5	See above	<0.05	9.8	Bacteria N P
O-13	12/28/18	4.60	<0.02	276	<0.5	See above	0.35	11.5	Bacteria N P
O-14	11/13/18	<0.05	<0.02	118	<0.5	See above	0.07	9.5	Bacteria N P
O-41	12/28/18	3.42	<0.02	276	<0.5	See above	0.75	8.2	Bacteria N P
O-46	12/21/18	0.06	<0.02	14	<0.5	See above	<0.05	9.5	Bacteria N P
O-47	12/21/18	0.10	<0.02	15	<0.5	See above	0.11	8.4	Bacteria N P
O-57	12/28/18	13.10	<0.02	488	<0.5	See above	2.15	17.6	Bacteria N P
O-58	12/28/18	11.50	<0.02	515	<0.5	See above	2.23	11.9	Bacteria N P
O-66	11/13/18	0.15	0.02	24	<0.5	See above	<0.05	8.8	Bacteria N P
O-68	12/28/18	0.40	<0.02	120	<0.5	See above	0.12	5.3	Bacteria N P
O-87	12/28/18	10.8	<0.02	528	<0.5	See above	6.29	13.4	Bacteria N P
O-88	12/28/18	0.22	<0.02	51	<0.5	See above	0.14	7.5	Bacteria N P
O-89	12/21/18	0.14	<0.02	39	<0.5	See above	0.11	10.7	Bacteria N P
O-121	12/21/18	0.10	<0.02	49	<0.5	See above	0.08	10.6	Bacteria N P
O-132	12/21/18	0.23	<0.02	300	<0.5	See above	0.07	12.1	Bacteria N P
O-138	12/21/18	0.14	0.03	48	<0.5	See above	<0.05	10.3	Bacteria N P

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

3.1 System Vulnerability Factor Summary

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

Outfall ID	Receiving Water	System Vulnerability Factors
O-180	5200-00 Quinpiac	9, 10
O-119	5305-00 West River	6, 9, 10
O-11	5305-00 West River	5, 6, 10
O-7	5305-00 West River	6, 10
O-10	5305-00 West River	5, 6, 10
O-12	5305-00 West River	5, 6, 10
O-13	5305-00 West River	5, 6, 10
O-14	5305-00 West River	6, 10
O-41	5305-00 West River	6, 10
O-46	5305-00 West River	6, 10
O-47	5305-00 West River	6, 10
O-57	5305-00 West River	6
O-58	5305-00 West River	6
O-66	5305-00 West River	6, 10
O-68	5305-00 West River	10
O-87	5305-00 West River	6, 9, 10
O-88	5305-00 West River	6, 9, 10
O-89	5305-00 West River	6, 9, 10
O-121	5302-00 Mill River	6, 9, 10
O-132	5302-00 Mill River	6, 9, 10
O-138	5302-00 Mill River	6, 9, 10

Where SVFs are:

1. History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages.
2. Sewer pump/lift stations, siphons, or known sanitary sewer restrictions where power/equipment failures or blockages could readily result in SSOs.
3. Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints.
4. Common or twin-invert manholes serving storm and sanitary sewer alignments.
5. Common trench construction serving both storm and sanitary sewer alignments.

6. Crossings of storm and sanitary sewer alignments.
7. Sanitary sewer alignments known or suspected to have been constructed with an underdrain system;
8. Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken, or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations.
9. Areas formerly served by combined sewer systems.
10. Any sanitary sewer and storm drain infrastructure greater than 40 years old in medium and densely developed areas.
11. Widespread code-required septic system upgrades required at property transfers (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).
12. History of multiple local health department or sanitarian actions addressing widespread septic system failures (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).

3.2 Key junction manhole dry weather screening and sampling data

Key Junction Manhole ID	Screening / Sample date	Visual/ olfactory evidence of illicit discharge	Ammonia	Chlorine	Surfactants
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No dry weather samples were taken during 2018

3.3 Wet weather investigation outfall sampling data

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants
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See 2.2 above

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

Discharge location	Source location	Discharge description	Method of discovery	Date of discovery	Date of elimination	Mitigation or enforcement action	Estimated volume of flow removed
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No illicit discharge locations were found during 2018

during CCTV
footage
review

Part IV: Certification

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

Chief Elected Official or Principal Executive Officer

Document Prepared by

Print name:

Print name:

Signature / Date:

Signature / Date: