

**3/30/2021**  
**MS4 General Permit**  
**Town of Orange 2020 Annual Report**  
**Existing MS4 Permittee**  
**Permit Number GSM 000036**  
**[January 1, 2020 – December 31, 2020]**

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This report documents The Town of Orange’s efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2020 to December 31, 2020.

**Part I: Summary of Minimum Control Measure Activities**

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

**1.1 BMP Summary**

<b>BMP</b>	<b>Status</b>	<b>Activities in current reporting period (if needed, more space available after this table)</b>	<b>Measurable goal</b>	<b>Department / Person Responsible</b>	<b>Due</b>	<b>Date completed or projected completion date</b>	<b>Additional details</b>
1-1 Implement public education and outreach	On Going	Information for residents posted on Town Website	Implement public education program BMPs and include these BMPs in the	Town Engineer/ R. Brinton	Ongoing	December 2017	Brochure for residents and links to DEEP and EPA website

			annual report				
1-2 Address education/ outreach for pollutants of concern*	On going	Distribute information on how to prevent and reduce source of pollution from reaching waterways	Address education and outreach for pollutants of concern	Town Engineer/ R. Brinton	Ongoing	July 2018	Post information in Town Buildings and on Orange Government Access Television (OGAT)

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

The Town will post messages on OGAT and the Town of Orange website to keep residents informed on ways to reduce and prevent pollution from catch basins that flow to waterways. The Town is researching information to purchase decals to label storm drains.

Signs posted on Town property to pick up after pets and bags are available. Signs are also posted on Town property to discourage the feeding of water fowl.

**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.
Brochures available in Town buildings	Residents (3,000-4,000)	Impact of fertilizer, pet waste and motor oil on stormwater that flows to the Long Island Sound	Bacteria, Nitrogen and Phosphorus	Public Works

## 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 Final Stormwater Management Plan publically available	Completed	Prepare, make available for review to the public, and file the Town's Stormwater Management Plan	Comply with public notice requirements for the SWMP and Annual reports	Town Engineer/ R. Brinton	Ongoing	Involve the community in implementing the Town's Stormwater Management Plan	
2-2 Comply with public notice requirements for Annual Reports	Completed	Public notice on Town website that annual report is available for review and comment	Comply with public notice requirements for the SWMP and Annual reports	Town Engineer/ R. Brinton	Feb 15, 2021	Involve the community in implementing the Town's Stormwater Management Plan	

Extra space for describing above BMP activities, if needed:

BMP	

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

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### 2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan to public	Y	March 29, 2017	Town Clerk's Office and Town website <a href="http://www.orange-ct.gov">www.orange-ct.gov</a>
Availability of Annual Report announced to public	Y	February 14, 2021	Town Clerk's Office and Town website <a href="http://www.orange-ct.gov">www.orange-ct.gov</a>

## 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	In progress	The Town of Orange has drafted a written IDDE program using the CT IDDE program template	Develop written plan of IDDE program	Town Engineer Zoning Enforcement Off. Inlands Wetland's Officer Health Dept.	Jul 1, 2018	Draft completed by 12/31/18	Coordinate with departments to develop written IDDE program
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	completed	The Town of Orange has updated storm water information on the GIS	Develop list and maps of all MS4 stormwater outfalls in priority areas	Town Engineer	Jul 1, 2019	July 1, 2019.	Stormwater information on the GIS includes outfalls, catch basins, stormwater pipe, and culverts. Storm water mapping update in progress-completion expected by 7-1-21.
3-3 Implement citizen reporting program	completed	Posting information on the Town website for resident to report suspected illicit discharges	Develop citizen reporting program	Town Engineer	Jul 1, 2017	Jul 1, 2017	

3-4 Establish legal authority to prohibit illicit discharges	completed	The Town adopted an ordinance to establish legal authority to prohibit illicit discharges	Establish legal authority to prohibit illicit discharges	Town Engineer Town Attorney	Jul 1, 2018	Jul 1, 2018	IDDE ordinance can be found in chapter 384 of the Town of Orange Town Code <a href="https://www.ecode360.com/33501160">https://www.ecode360.com/33501160</a>
3-5 Develop record keeping system for IDDE tracking	completed	Developed a record keeping system for IDDE Tracking	Develop record keeping system for IDDE tracking	Town Engineer	Jul 1, 2017	Jul 1, 2017	Illicit discharges that are reported in person, or by calling the Town, or online on the Town website are tracked
3-6 Address IDDE in areas with pollutants of concern				Town Engineer	Not specified	Will be ongoing for the entirety of the MS4 Permit	Every Monday from end of May to September, the Health Dept. tests water for bacteria levels and checks a fluorometer with filter installed in the Wepawaug River for detergents. If levels of bacteria are high or detergents are found they investigate to determine where the discharge is originating from and take actions to correct it

**Extra space for describing above BMP activities, if needed:**

<b>BMP</b>	

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

A link to the written program is posted on the Public works webpage and a link is listed in the Annual Report. The Town will update the written IDDE program as needed throughout the permit term.

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

Date of Report	Location / suspected source	Response taken
1/16/2020	41 Andrew Lane	Investigated complaint of odor in catch basin. Failing septic system with groundwater breakout flowing overland and getting into storm drain. Health Dept to oversee repairs.
2/5/2020	382 Hitching Post Dr.	Investigated small diameter pipes in catch basins – confirmed roof/footing drains.
2/5/2020	347 & 360 Coachmans Lane	Investigated small diameter pipes in catch basins – confirmed roof/footing drains

**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)

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

Any report of a suspected illicit discharge is investigated and tracked by Public Works with the help of Inlands Wetlands, and the Town Sanitarian. They will be involved in follow up and inspection to make sure corrective measures have been completed.

**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
41 Andrew Lane	Investigate with Health Dept. Health Dept to oversee septic system repairs.	Indian River

### 3.7 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	602
Estimated or actual number of interconnections	unknown
Outfall mapping complete	100%
Interconnection mapping complete	50%
System-wide mapping complete (detailed MS4 infrastructure)	100%
Outfall assessment and priority ranking	100%
Dry weather screening of all High and Low priority outfalls complete	100%
Catchment investigations complete	602
Estimated percentage of MS4 catchment area investigated	100%

### 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).

The Highway crew chief annually reviews IDDE prevention and detection controls with the Public Works staff. BMP's regarding the Public Works Garage are covered, ie. outdoor storage of materials that need to be covered and contained, vehicles are to be maintained and washed inside, and a spill kit needs to be at the fueling island. When they are on the road they must stay alert and look for trash and debris to pick up, storm drains and catch basins must be kept free of debris and cleaned regularly, and any non- storm water discharges must be reported and investigated.

## 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 MS4 general permit	On Going		Implement, upgrade and enforce land use regulations to meeting MS4 permit requirements	Town Engineer/ Director of P.W. Planning & Zoning Inlands Wetland's Officer Town Attorney	Jul 1, 2019	Ongoing Beginning July 1, 2019	Section 383-119 of the Orange Zoning Regulations provide Enforcement Authority
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	Completed	Signature & approval from Municipal Dept. Heads are required for all Site Plan applications	Develop/implement plan for interdepartmental coordination in site plan review approval	Town Engineer/ Director of P.W. Planning & Zoning Inlands Wetland's Officer Building Dept.	Jul 1, 2017	July 1, 2017	In the Orange Town Code site plan is reviewed in Chapter 381 Inland Wetlands & Watercourse Regulations Chapter 382 Subdivision Regulations Chapter 383 Zoning Site Plans
4-3 Review site plans for stormwater quality concerns	Completed	Drainage review for all projects require review & signature of the Town Engineer, Wetlands Enforcement Officer & Zoning Enforcement Officer	Review site plans for stormwater quality concerns	Town Engineer/ Director of P.W. Planning & Zoning Inlands Wetland's Officer Building Dept.	Jul 1, 2017	July 1, 2017	
4-4 Conduct site inspections	Completed	Inspections of all drainage is conducted by the Town Engineer, Wetlands Enforcement Officer & Zoning Enforcement Officer	Conduct site inspections	Town Engineer/ Director of P.W. Planning & Zoning Inlands Wetland's Officer Building Dept.	Jul 1, 2017	July 1, 2017	<i>Inspections are covered Under Article I General Provisions and Administration 383-9</i>



4-5 Implement procedure to allow public comment on site development	Completed	Public Comment is permitted for all Site Plan Applications before the Orange Town Plan & Zoning Commission	Implement procedures to allow public comment on site development	Planning & Zoning Inlands Wetland's	July 1, 2017	July 1, 2017	All Inland Wetlands and Planning & Zoning Meetings are open to the public. Dates & times are posted in Town Hall and on the Town Website <a href="http://www.orange-ct.gov">www.orange-ct.gov</a>
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	On Going	No formal procedure but we are aware of when a DEEP Permit is required and direct the developer to obtain permit	Implement procedure to notify developers about DEEP construction stormwater permit	Town Engineer/ Director of P.W. Planning & Zoning Inlands Wetland's Officer Building Dept.	July 1, 2017	July 1, 2017	

**Extra space for describing above BMP activities, if needed:**

<b>BMP</b>	

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

## 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	In progress		Update legal authority guidelines regarding LID and runoff reduction in site development planning	Town Engineer/ Director of Public Works Planning & Zoning Inlands Wetland's Officer Town Attorney	Jul 1, 2021	Projected July 1, 2021	Rate of flow & volume reduction is required by Orange Inland Wetlands
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	In Progress		Enforce LID/runoff reduction requirements for development and redevelopment projects	Town Engineer/ Director of Public Works Planning & Zoning Inlands Wetland's Officer	Ongoing beginning Jul 1, 2019	Projected July 1, 2021	Rate of flow & volume reduction is required by Orange Inlands Wetlands
5-3 Identify retention and detention ponds in priority areas	On going		Identify retention and detention ponds in priority areas	Town Engineer/ Director of Public Works Planning & Zoning Inlands Wetland's Officer	Jul 1, 2019	Ongoing Beginning July 1, 2019	Wetlands Enforcement Officer tracks retention and detention ponds. An annual letter is sent out in March to remind property owners of their responsibility to maintain and inspect the structure. The Wetlands Enforcement Officer does random inspections when out in the field.

5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	On going		Implement long-term maintenance plan for stormwater basins and treatment structures		Ongoing beginning Jul 1, 2019	Ongoing Beginning July 1, 2019	All Wetlands & Zoning approvals provide for structure Maintenance with Town maintenance as a contingency
5-5 DCIA mapping	In Progress		Complete DCIA Mapping	Town Engineer/ Director of Public Works Planning & Zoning Inlands Wetland's Officer	Jul 1, 2020	Projected July 1, 2021	
5-6 Address post-construction issues in areas with pollutants of concern	In Progress		Address post-construction issues in areas with pollutants of concern	Town Engineer/ Director of Public Works Planning & Zoning Inlands Wetland's Officer	Not specified	Projected July 1, 2021	Inland Wetlands Officer, Zoning Officer & Town Engineer monitor post construction/pollutant concerns.

**Extra space for describing above BMP activities, if needed:**

<b>BMP</b>	

**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)	112.27 acres
DCIA disconnected (redevelopment plus retrofits)	0 acres this year / 0 acres total
Retrofits completed	0
DCIA disconnected	0% this year / 0% total since 2012
Estimated cost of retrofits	\$
Detention or retention ponds identified	#2 this year /#59 total

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

Baseline DCIA was calculated by using Method number 2, The Town of Orange falls into Connectivity Level 3-Moderately Connected. Using the 2012 Impervious Cover Total IC% is 15.90%.  $15.90 \div 1.5 = 63.400 \times .10 = 6.34\%$ .  $6.34\% \text{ of } 1,770.69 \text{ acres} = 112.27 \text{ acres}$ .

## 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	Annually reviewing with employees protocol and responsibilities on the proper handling of materials and spills and identifying and reporting illicit discharges	Develop/implement formal employee training program	Town Engineer/ Director of Public Works	Jul 1, 2017	Jul 1, 2017	Town Engineer attended Municipal Environmental Compliance Seminar in August 2018
6-2 Implement MS4 property and operations maintenance	On Going	Town property maintenance includes proper storage of chemicals and fertilizers, signs posted on Town property to pick up after pets and bags are available, signs posted on Town property to discourage the feeding of water fowl, Trash and recycling receptacles are located on Town property	Implement MS4 property and operations maintenance	Town Engineer/ Director of Public Works	Ongoing beginning Jul 1, 2018	Grass clippings are not accepted at the Transfer Station but residents may bring leaves free of charge, the Town also opens the Transfer Station on Sundays in November for leaf dumping	Grass clippings are not accepted at the Transfer Station but residents may bring leaves free of charge, the Town also opens the Transfer Station on Sundays in November for leaf dumping
6-3 Implement coordination with interconnected MS4s	In Progress		Implement coordination with interconnected MS4s	Town Engineer/ Director of Public Works	Not specified		
6-4 Develop/implement program to control other sources of pollutants to the MS4	Not Started		Develop/Implement program to control other sources of pollutants to MS4	Town Engineer/ Director of Public Works	Not specified		

6-5 Evaluate additional measures for discharges to impaired waters*	Not Started		Evaluate additional measures for discharges to impaired waters	Town Engineer/ Director of Public Works	Not specified		
6-6 Track projects that disconnect DCIA	Not Started		Track projects that disconnect DCIA	Town Engineer/ Director of Public Works	Jul 1, 2017		
6-7 Implement infrastructure repair/rehab program	Not Started		Develop/Implement infrastructure repair/rehab program	Town Engineer/ Director of Public Works	Jul 1, 2021	Projected July 1, 2021	
6-8 Develop/implement plan to identify/prioritize retrofit projects	Not Started		Develop/Implement plan to identify/prioritize retrofit projects	Town Engineer/ Director of Public Works	Jul 1, 2020	Projected July 1, 2021	
6-9 Implement retrofit projects to disconnect 2% of DCIA	Not Started		Implement retrofit projects to disconnect 2% of DCIA	Town Engineer/ Director of Public Works	Jul 1, 2022	Projected July 1, 2022	
6-10 Develop/implement street sweeping program	On Going	Streets are swept annually	Continue street sweeping program	Town Engineer/ Director of Public Works	Jul 1, 2017	Ongoing	
6-11 Develop/implement catch basin cleaning program	On Going	Catch basins are inspected and cleaned annually	Develop/implement catch basin cleaning program	Town Engineer/ Director of Public Works	Ongoing beginning Jul 1, 2020		
6-12 Develop/implement snow management practices	On Going	The Town uses straight rock salt, no sand or liquid de-icers are used. Roads are not pretreated but done during the storm on an as needed basis	Develop/implement snow management practices	Town Engineer/ Director of Public Works	Ongoing beginning Jul 1, 2018	Ongoing beginning Jul 1, 2018	

Extra space for describing above BMP activities, if needed:

BMP	

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

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### 6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	
Employee training provided for key staff	(y/n) / date(s)
Street sweeping	
Curb miles swept	60 miles
Volume (or mass) of material collected	unknown
Catch basin cleaning	
Total catch basins in priority areas	585
Total catch basins in MS4	5408
Catch basins inspected	5408
Catch basins cleaned	200
Volume (or mass) of material removed from all catch basins	unknown
Volume removed from catch basins to impaired waters (if known)	unknown
Snow management	
Type(s) of deicing material used	Rock Salt
Total amount of each deicing material applied	2,500lbs
Type(s) of deicing equipment used	Truck mounted spreader
Lane-miles treated	110 miles
Snow disposal location	
Staff training provided on application methods & equipment	(y/n) / dates(s)
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	0 lbs or %
Reduction in turf area (since start of permit)	0 acres
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	\$

### 6.4 Catch basin cleaning program

Provide any updates or modifications to your catch basin cleaning program
The Town cleaned catch basins that were discovered full of sediment during the town mapping and screening.



## 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.**

**Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection in future years.**

**Describe plans for continuing the Retrofit program beyond this permit term with the goal to disconnect 1% DCIA annually over the next 5 years.**

## Part II: Impaired waters investigation and monitoring

### 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.

Outfalls are being tested by an independent contractor , contracted by Public Works Dept to comply with MS4 regulations.

### 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? *

## 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? *

\*Follow-up investigation required (last column) if the following pollutant thresholds are exceeded:

Pollutant of concern	Pollutant threshold
Nitrogen	Total N > 2.5 mg/l
Phosphorus	Total P > 0.3 mg/l
Bacteria (fresh waterbody)	<ul style="list-style-type: none"> <li>E. coli &gt; 235 col/100ml for swimming areas or 410 col/100ml for all others</li> <li>Total Coliform &gt; 500 col/100ml</li> </ul>
Bacteria (salt waterbody)	<ul style="list-style-type: none"> <li>Fecal Coliform &gt; 31 col/100ml for Class SA and &gt; 260 col/100ml for Class SB</li> <li>Enterococci &gt; 104 col/100ml for swimming areas or 500 col/100 for all others</li> </ul>
Other pollutants of concern	Sample turbidity is 5 NTU > in-stream sample

## 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

#### 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)

**Part III: Additional IDDE Program Data**

**1. Assessment and Priority Ranking of Catchments data (Appendix B (A)(7)(c) / page 5)**

Provide a list of all catchments with ranking results (DEEP basins may be used instead of manual catchment delineations).

1. Catchment ID (DEEP Basin ID)	2. Category	3. Rank

**2. Outfall and Interconnection Screening and Sampling data (Appendix B (A)(7)(d) / page 7)**

**2.1 Dry weather screening and sampling data from outfalls and interconnections**

Provide sample data for outfalls where flow is observed. Only include Pollutant of concern data for outfalls that discharge into stormwater impaired waterbodies.

**See attached dry weather outfall screening data.**

Outfall / Interconnection ID	Screening / sample date	Ammonia	Chlorine	Conductivity		Salinity	E. coli or enterococcus	Surfactants	Water Temp	Pollutant of concern	If required, follow-up actions taken

**2.2 Wet weather sample and inspection data**

**See attached wet weather outfall sampling 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	Chlorine	Conductivity	Salinity	E. coli or Enterococcus	Surfactants	Water Temp	Pollutant of concern

**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

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

### 3.3 Wet weather investigation outfall sampling data

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants

### 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

**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

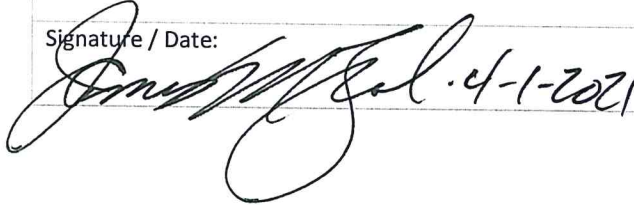
Print name:

James M. Zeoli, First Selectman

Print name:

Robert H. Brinton, Jr. Town Engineer

Signature / Date:

 .4-1-2021

Signature / Date:

 3/30/21