STORMWATER POLLUTION PREVENTION PLAN

BOROUGH OF NAUGATUCK
POLICE DEPARTMENT AND
SALT AND SAND STORAGE FACILITY
211 SPRING STREET
NAUGATUCK, CONNECTICUT

September 12, 2011

MMI #2129-22-1

Prepared for:

Borough of Naugatuck
Department of Public Works
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1.0 INTRODUCTION

This Stormwater Pollution Prevention Plan (SWPPP) has been developed for the Borough of Naugatuck (the Borough) Police Department and Salt and Sand Storage Facility in accordance with the requirements of the General Permit for the Discharge of Stormwater Associated with an Industrial Activity, which goes into effect on October 1, 2011 (the General Permit). A copy of the General Permit is in Appendix A. Milone & MacBroom, Inc. (MMI) has been retained by the Borough to prepare this SWPPP as part of the General Permit registration. The Borough's Police Department is located at the portion of the site along Spring Street, while the rear portion of the site is used to store sand, salt, and brush. In implementing this plan, it is the Borough's intent to prevent pollution of surface waters from stormwater that is generated by all operations at the site. Site usage can be characterized under the Department of Energy & Environmental Protection (DEEP) use code Sector G – Transportation and Public Works.

Information contained in this SWPPP has been obtained from site inspections, facility records, and communications with municipal personnel. A copy of this plan shall be maintained at the site as required by Section 5(c)(1)(A) of the General Permit. An electronic copy of the plan shall also be placed on the Borough's website (http://www.naugatuck-ct.gov).

2.0 SITE DESCRIPTION

2.1 Applicable Standard Industrial Classification (SIC) Codes

The primary industrial activity at the Police Department is classified under the primary Standard Industrial Classification (SIC) Code 9199 Public Works Garage and the North American Industrial Classification System Code 92119. Operations at the facility are categorized under Sector G – Transportation and Public Works and include maintenance, repair, and salt storage.

2.2 General Description and Current Uses

The Naugatuck Police Department and Salt/Sand Storage Facility are located at 211 Spring Street and consist of two adjacent parcels that are owned by the Borough and used for the facilities. The Spring Street parcel used to contain "The Heights," which was a housing project for the elderly that was built and dismantled in the early 1990s. This parcel is approximately 13.5 acres. In the last couple of years, the Borough foreclosed on the second parcel that was formerly part of the condominium complex to the north. This parcel is approximately 3.1 acres. The parcels are bordered by open space land to the east and by residential properties to the north, west, and south. Figure 2-1 is an aerial-based location map of the site.

The Naugatuck Police Department was constructed in 1995 and consists of a 9,300 square foot (s.f.) office building, a 1,269 s.f. vehicle maintenance garage, a 2,000 s.f. carport and approximately 15,000 s.f. of paved area. Floor drains in the vehicle maintenance garage discharge to an oil/water separator and then to municipal sanitary sewer in Spring Street. The discharge and connection was permitted by the Connecticut DEEP. General maintenance operations such as oil changes are performed on municipal vehicles in the garage at the rear of the police department. No maintenance is performed on the vehicles stored in the carport. An 8,000-gallon aboveground ConVault tank located on the north side of the maintenance garage is used to store gasoline for Police and Borough vehicles.

The storage of salt and sand for Borough operations began in 2005. Access to the Borough's salt and sand storage facility is via a 1,600 linear feet paved access drive from the rear of the Naugatuck Police Department, a remnant of the previous development. The main salt storage area is located on the line between both parcels and is located approximately 1,000 feet west of the Naugatuck River. The structure consists of concrete block retaining walls for separation of materials, covered by a metal frame canopy. A second storage area is located west of the first and also consists of concrete block walls with a metal frame canopy. At the time of our site observations, both canopies had been damaged by vandalism.

The area is also used for the stockpiling of bituminous millings and woodchips. Both stockpile areas have been ringed with a bermed area of the respective materials, but no erosion control materials have been installed. The wood chip stockpile appears to be encroaching on the adjacent parcel.

2.3 Environmental Setting

Both parcels are located within the Naugatuck River watershed, with a subbasin divide falling at the salt storage area. The eastern portion of the site is located in 6900-00-4-R15, and the western portion of the site is located in 6900-00-4-R16, with both subbasins discharging to the Naugatuck River and eventually the Housatonic River. The Naugatuck River is located to the east of the site; however, both parcels are located outside its floodplain. There are no direct discharge points from the site to the river.

The Connecticut DEEP July 2011 Natural Diversity Database (NDDB) was accessed to determine whether state-listed special concern, threatened, and/or endangered species occur within the project limits. According to the database, there are no areas of concern within the site limits.

The parcel is not located in an Aquifer Protection Zone or any public water supply watersheds. The site is located outside of the Coastal Consistency Review Boundary. The parcel is not located in any FEMA-delineated flood zones, per the New Haven County Flood Insurance Study (effective date December 17, 2010).

2.4 Stormwater Conveyance Structures

The following paragraphs summarize the stormwater conveyance systems that are the subject of this permit and reflect the modifications enumerated in Section 5 and currently proposed improvements by the Borough. In total, the site has only one direct discharge point, with overland flow from the majority of the undeveloped portions of the site. The watershed areas are delineated on the appended Site Plan (Appendix B), and potential pollutant sources are addressed in Section 3.0. The

areas are approximate and have been delineated based on limited site topography provided by LiDAR two-foot contours taken in 2000, mapping of The Heights and a field visit in June 2011.

Stormwater discharge from developed and paved areas associated with the Police Department is collected via a series of catch basins in the rear parking area and access drive. Stormwater then discharges to an MS4 system in Spring Street. The MS4 system eventually discharges to Hop Brook. Hop Brook discharges to the Naugatuck River approximately 1,700 feet south of the subject parcel. Stormwater discharge over the rear parking area and from roof leaders at the maintenance garage and carport is collected in a series of underground detention structures that are located beneath the pavement. The structures overflow to the main system in the access drive and Spring Street. An additional series of detention structures is located under the visitor parking lot in front of the Police Department. These structures collect runoff from the paved parking area and overflow via a 15" reinforced concrete pipe (RCP) to the system in Spring Street.

Many of the catch basins and piping associated with the previous development (The Heights) still remain in the access road to the salt, milling, and woodchip stockpile area. This stormwater conveyance system ties into the system at the Police Department. It is assumed that the uppermost catch basins in the area of the bituminous milling stockpile and woodchip stockpile have been either destroyed or covered by the stored material.

In addition to the street drainage, an additional conveyance system exists along the site's northern property line where an upland catch basin discharges to an open swale and eventually back into a piped system that joins the Police Department system. This open swale also intercepts drainage from a catch basin in the High Ridge Road cul-de-sac that discharges to the subject site via a 15" RCP.

There is currently no stormwater infrastructure located within the salt and material storage area. All stormwater runoff discharges overland through forested areas either to the west, eventually making its way to the municipal storm drainage system in Spring Street, or to the east and the Naugatuck River.

Engineering, Landscape Architecture and Environmental Science

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Naugatuck Salt Storage Facility
211 Spring Street

LOCATION:
Naugatuck, CT

MMI#: 2129-22
MXD: P:\Figure1-SaltStorage.mxd
SOURCE: Microsoft

N

Microsoft Virtual Earth 2008 Aerial Mapping

Map By: BAM
Date: July 2011
Scale: 1:8,000

SHEET:
Figure 2-1

3.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

In accordance with Section 5.(f).7 (Sector G) of the General Permit, Table 3-1 is a summary of sources and activities within each respective drainage area that have the potential to contribute pollutants to stormwater runoff. The table also notes required management practices and controls in accordance with the permit. The appended site plan indicates the location of potential sources of pollution within each watershed based on the activities that are currently carried out at the facility.

TABLE 3-1
Summary of Exposed Materials

Exposed Materials	Method of Storage	Management Practices	Controls	Pollutants of Concern*
Sand/Salt Mix	Stockpile	None	Debris fence, inlet screen in drainage system	TSS, NaCl, MgCl
Ice Control Salt/Treated Salt	Stockpile	None	Debris fence	TSS, TP, TKN, NO3-N, NaCl, MgCl
Vehicle Fueling Area	ConVault Storage Tank	Spill kit	Spill kit	Gasoline
Vehicle Storage	Parked outside	Regular preventative maintenance. Inspections.	Catch basin	O&G

*Note: O&G = Oil and Grease
COD = Chemical Oxygen Demand
TSS = Total Suspended Solids
TP = Total Phosphorous
TKN = Total Kjeldahl Nitrogen
Cu = Copper
Zn = Zinc
Pb = Lead
NO3-N = Nitrate-Nitrogen

3.1 Drainage Area 001

DA-001 consists of storm drainage collected in the various catch basins and yard drains associated with the developed portion of the site. It includes the paved areas and buildings associated with the Police Department (including the overflow from the stormwater detention structures), access road to the salt storage facility, portions of land previously paved, and forested land to the rear of the Police Department.

Stormwater is collected by a series of catch basins in the bituminous access road that remain from The Heights development, in the parking areas to the rear of the police facility and the visitor lot at the entrance, yard drains in lawn areas adjacent to the Police Department, newer catch basins in the main access driveway, and roof leaders from the maintenance garage and carport. This drainage system discharges at two locations to the stormwater conveyance system in Spring Street. The largest drainage subarea discharges to Spring Street at the entrance drive (CB-1 on the appended site plan), while the smaller subarea to the visitor center underground detention units discharges 110 feet to the south (CB-8 on the appended site plan).

This drainage area includes the vehicle maintenance garage. Materials used for the repair and maintenance of service vehicles are stored inside the garage area. These chemicals include gasoline, motor oil, transmission fluid, and paints (refer to Appendix B for a complete list). Materials are stored inside the building and are not exposed to stormwater. Vehicle washing is also completed inside the garage. The garage floor drains are connected to an oil/water separator and discharge to the municipal sanitary sewer system. Oily wastes, if present, are periodically removed and disposed of off site by a licensed contractor.

The drainage area also includes a partitioned ConVault-type double-walled, aboveground storage tank and refueling area. The tank contains 8,000 gallons of gasoline. The tank has an integral secondary containment structure and is equipped with overfill protection devices. The refueling area is currently not covered with any type of roof structure, and the pavement adjacent to the pumps is graded toward one of the system catch basins.

The Police Department buildings have gutters and roof drains that discharge to the storm sewer system on site. No roof vents or activities were observed to be performed at the site that would result in the discharge of pollutants to stormwater via an exhaust system.

The drainage area also includes a portion of drainage from the High Ridge Road cul-de-sac, where two catch basins collect surface runoff and discharge to a swale via a 15" RCP. The remainder of High Ridge Road discharges via a stormwater conveyance system that reaches Spring Street.

Based on the structures and facilities within the drainage area, potential pollutants include oil and grease, metals, suspended solids, phosphorous, and nitrogen.

3.2 Drainage Area 002

DA-002 consists of the remaining portion of the police facility and western portion of the site that discharges overland to Spring Street. The drainage area has no direct outfall and collects stormwater primarily from grassed and forested areas. The area includes the gravel parking area used as the impoundment yard for police-seized vehicles. Their extended storage in this area has the potential for the release of fluids associated with automobiles such as gasoline and oil. There are no other chemicals stored or materials stockpiled in this area.

3.3 Drainage Area 003

DA-003 consists of the smaller salt storage shed, the bituminous milling stockpile, and the undeveloped forested area that drains overland to the west, eventually reaching Spring Street. There are no stormwater conveyance structures in this drainage area. Materials that have the potential to impact stormwater quality include the salt stored in the covered shelter and the bituminous millings. The salt storage shed is currently covered, but tears in the sheet roof have the potential to expose the salt to rainwater. The millings remain uncovered and appear to be stable; however, vehicle tracking through the drainage area has the potential to stir up dust and particulates.

3.4 Drainage Area 004

DA-004 consists of the remaining portions of the property that discharge via overland flow to the south and east, eventually reaching the Naugatuck River. The area includes the larger sand/salt storage shed and the woodchip stockpile area. There are no stormwater conveyance structures in this drainage area, though sheet flow has the potential to form rills and drainage ditches during larger storm events. The discharge from this area flows through approximately 450 feet of undeveloped, forested land before reaching developed land and eventually the river. The salt storage facility consists of two metal frame structures with polyethylene flexible covers. Walls of the structure are constructed from concrete blocks. When in good condition, the cover protects the stored salt from exposure to rainwater. However, the material can rip and result in exposure. A drainage swale originating from the rear of the storage facility was noted during a July 2011 site visit, most likely due to the exposure of the salt to the rainwater through the torn cover. Recommendations in Section 5.0 should eliminate this direct discharge point.

3.5 Inventory of Exposed Materials and Potential Pollutant Sources

In accordance with Section 5(c)(2)(D)(ii) Inventory of Exposed Materials, the following sections provide a summary of specific activities that have the potential to impact stormwater quality.

Loading and Unloading Operations

Municipal vehicles utilize the site extensively for loading and unloading operations of bituminous millings, dumping of woodchips, and winter usage of the treated sand and sand/salt mix. Periodic refilling of the ConVault storage tank has the potential for the release of gasoline. Spill containment is necessary to prevent any of the spillage to enter the site's stormwater conveyance system.

Roof Areas

Activities at the buildings do not have process vents that would discharge to the roof and become potential stormwater contaminants.

Outdoor Storage Activities (Dumpsters, Equipment, and Leaf/Yard Waste)

Brush waste from municipal activities and resident collection is deposited at the site. Woodchips created from the chipping process are spread over a large area to the south of the salt storage shed.

Outdoor Manufacturing or Processing Activities

There are no outdoor manufacturing or processing activities at the facility.

Dust- or Particulate-Generating Processes

The Borough's sand and salt storage operations are located within covered metal frame structures. The material over the structure has the potential to tear and expose the stored salt and sand/salt mix. Active woodchipping processes also have the potential to generate particulates.

On-Site Waste Disposal Practices

There is no active on-site solid waste disposal of goods at the facility.

3.6 Spills and Leaks

There have been no recorded spills or leaks of five gallons or more of toxic or hazardous substances at the facility that could affect stormwater. Any spills or leaks of five gallons or more will be recorded on site using the form provided in Appendix D of this plan.

4.0 MEASURES AND CONTROLS

The following stormwater management controls are in place for the operations at the facility. In addition to the control measures specified in "Control Measures" (Section 5(*b*)) of the General Permit, the following include the additional control measures as per sector-specific requirements.

4.1 Pollution Prevention Team

The Pollution Prevention Team is responsible for implementing the SWPPP, ensuring compliance with regulatory requirements and providing acceptable environmental quality of the site and of the stormwater discharges. A number of Borough employees will be responsible for the implementation of the SWPPP.

Pollution Prevention Coordinator:
Borough Engineer: Wayne Zirolli, P.E.
Phone: (203) 720-7006
Email: WZirolli@naugatuck-ct.gov

- Responsibilities: *Coordinate all stages of SWPPP development and implementation, submit budget requests sufficient for proper site operation and maintenance, establish staff responsibilities and job duties and delegate them appropriately, establish and implement training programs as appropriate, maintain records and ensure regulatory reports are submitted as required, coordinate semiannual site inspections and annual water quality monitoring; periodically update the SWPPP as necessary.*

Member:

Director of Public Works: James Stewart, P.E.

Phone: 203-720-7071 or 203-720-7043

Email: JStewart@naugatuck-ct.gov

- Responsibilities: *Oversee the implementation of preventive maintenance and "good housekeeping" at the facility, respond to emergency situations, spill response coordinator.*

Member:

Police Chief: Chris Edson

Phone: 203-729-5222

Email: CEdson@sbcglobal.net

- Responsibilities: *Oversee the implementation of preventive maintenance and "good housekeeping" at the facility, respond to emergency situations, spill response coordinator.*

The SWPPP will be updated by the Pollution Prevention Coordinator whenever (1) there is a change at the site that has an effect on the potential to cause pollution of the waters of the state or (2) the actions required by the plan fail to ensure or adequately protect against pollution of the waters of the state. The required SWPPP certifications are included herein as Appendix A.

4.2 Good Housekeeping/Preventive Maintenance

Proper housekeeping will be practiced at the site to prevent inadvertent discharges to the stormwater system. No washing of equipment or vehicles should be conducted except within the vehicle maintenance garage. Any fluids or materials incorporated in vehicle maintenance should be collected with sorbent materials.

The Borough will maintain the integrity and effectiveness of all collection containers and systems to contain pollutants and minimize exposure to rainfall and runoff. In addition to the placement of erosion controls as described below, the following preventive maintenance should be completed as necessary based on the results of site inspections as part of the preventive maintenance program:

- Maintain erosion control mechanisms adjacent to the salt storage facilities.
- Inspect and clean catch basins at least annually.
- Inspect and clean gutters.
- Perform sweeping of paved areas semiannually.
- Perform weekly inspection of the salt storage stockpile area polyethylene covers.
- Place all sand and salt stockpiles inside the storage facilities. Cover excess stockpiles with polyethylene sheeting. Maintain the sheeting, repairing rips immediately upon observation.
- Inspect the aboveground gasoline tank for signs of leakage or cracking.
- Inspect oil/water separator semiannually and pump as needed.
- Drip pans shall be used when performing maintenance on vehicles.
- Fluid changes shall be performed in areas where floor drains are connected solely to oil/water separators prior to discharge to the sanitary sewer system.
- Spills shall be immediately cleaned with absorbent material. Speedi-dri or other similar sorbent material will be kept on site for spill cleanup. Used or "spent" Speedi-dri will be stored in 55-gallon drums until it can be properly disposed of off site. Spills will be cleaned up in accordance with the procedures outlined in this

plan. A spill containment kit will be located at this site to keep any possible fuel spills from entering the drainage system.

- Funnels shall be used to minimize leaks and spills when transferring fluids.
- Oily wastes shall be kept separate from other waste materials.
- Dirty rags shall be stored in a covered container.
- No drums shall be stored outdoors.
- Annual stormwater sampling shall be performed in accordance with Section 6.0 of the SWPPP and requirements of the General Permit.

The primary areas for potential release of pollutants to stormwater include the refueling area and the salt storage area. The gasoline storage tank is abovegrade, with secondary containment integral to the design of the tank. The filling stations are equipped with an automatic shutoff to prevent potential overtopping of vehicle gas tanks. The salt storage facility is covered but the material can rip, and there is no mechanism to prevent stormwater from entering from the access drive. No other chemicals and materials were observed stored outside at the site.

4.3 Vehicle and Equipment Washing

All vehicle washing is performed inside the maintenance garage. Vehicle washing should not be performed outside the garage or in any area on site where washwater may discharge untreated to the stormwater collection system, the Naugatuck River, or its tributaries (i.e., Hop Brook). The oil/water separator shall be inspected at least annually for the accumulation of sediment and oils and shall be cleaned out as necessary.

4.4 Roof Areas

No roof areas were identified during the site inspections as being exposed to chemicals or other pollutants. As such, preventative maintenance items are not necessary to prevent nonstormwater-related discharges.

4.5 Sediment and Erosion Controls

Erosion and sedimentation controls shall be installed in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. These controls will be installed and maintained to protect the waters of the state. Additional recommendations have been included in Section 5.0. As site conditions may change, inspections that reveal potential erosion will be addressed by implementing additional measures to limit stormwater impacts. Maintenance activities will be performed as needed based on visual inspection by the SWPPP team.

Most of the site consists of either stable vegetation or pavement; however, some operations at the site have the potential to generate dust/particulates. Sand storage facilities shall be addressed with the installation of silt fence or other sediment control measures around the downgradient sides of the structures.

4.6 Spill Prevention and Response Procedures

The Police Department garage is a potential spill area. In the event of an accidental discharge of chemical material, the Pollution Prevention Coordinator will be notified immediately to coordinate response procedures. The Pollution Prevention Coordinator will be notified of releases regardless of spill quantity. If the spill represents an immediate health or explosion hazard, the Naugatuck Fire Department will be contacted immediately by dialing 911. The spill will also be reported to the CTDEEP Oil and Chemical Spills Unit at (860) 424-3338. A spill response record form is provided in Appendix C.

Containment of the spill will begin immediately using available manpower and materials. Sorbent material will be clearly marked and available at all potential spill locations. The spill will be contained as close to the source as possible with absorbent materials. These materials will be removed immediately and disposed of in a proper manner. Expended sorbent and its associated fluid will be removed and placed into a sorbent disposal drum. The waste drum will be located in an appropriate disposal area and removed to a qualified facility for proper treatment. In the event that

containment of the spill is beyond the capability of the available manpower, the nearest available cleanup contractor will be notified. Any material released to the floor drains of the garage areas will be held in the oil/water separator prior to discharge to the sanitary sewer, thereby preventing any harmful impacts.

4.6.1 Fueling Area Spill Prevention

The fueling area located to the north of the maintenance garage should be equipped with readily accessible spill containment and control measures to prevent the possibility of petroleum hydrocarbons from entering the stormwater system. A spill kit consisting of absorbent material should be provided near each fueling station. The spill kit should also include sufficient absorbent boom or catch basin covers to prevent a spill from entering nearby catch basins.

The spill response coordinator shall be responsible for contacting the CTDEEP as well as local emergency management officials as required. A listing of Borough personnel and state, local, and federal officials who must be contacted in case of an emergency is included in Table 4-1.

TABLE 4-1
Emergency Contact Information

Agency	Contact Information
Emergency-Medical-Fire-Police	911
Naugatuck Fire Chief	(203) 720-7082
Naugatuck Police Department (Nonemergency)	(203) 729-5221
Area Health District	(203) 881-3255
Naugatuck Engineering	(203) 720-7006
CTDEEP Emergency Response and Spill Prevention	(860) 424-3338
CTDEEP Waste Management	(860) 424-3366
CTDEEP Water Management	(860) 424-3914
State Office of Emergency Medical Services	(860) 509-7975
State Fire Marshal/Bureau of Engineering	(860) 685-8350

4.7 Employee Training

Employees will be trained regarding the safe and appropriate handling of materials that are used on site as well as appropriate stormwater management techniques. The Pollution Prevention Coordinator or his designee will train new employees within 90 days of hire. A log will be kept to verify training has occurred.

Employees will receive training on this SWPPP, including its contents and recommendations. Training will include information on the importance of good stormwater management practices, spill response procedures, and material management practices. Storm drain structures including drywells and oil/water separators will be identified during training, and the importance of preventing nonstormwater discharges will be discussed. Employees will also be taught good housekeeping and preventive maintenance practices. The spill prevention and response procedures will be reviewed such that each employee is familiar with the required practices in the event of a material spill.

4.8 Nonstormwater Discharges

The General Permit identifies allowable nonstormwater discharges. These discharges are allowed provided they do not impact water quality. Allowable nonstormwater discharges at the site include the following:

- → Landscape irrigation and lawn watering runoff
- → Uncontaminated ground water discharges such as from foundation drains and footing drains; residual street washwater
- → Discharges containing no chemical additives (including chlorine) from flushing fire systems
- → Naturally occurring discharges such as rising ground water and springs

Based on a review of operations, it appears that certain facility modifications may be necessary to prevent the potential for nonstormwater-related discharges. These suggested modifications are included in Section 5.0.

5.0 RECOMMENDATIONS FOR STORMWATER MANAGEMENT

The following improvements are recommended, each intended to protect stormwater at this site. Engineering details of each of these improvements need to be evaluated in detail prior to implementation. The cost of the proposed improvements should be incorporated into a five-year capital improvement program, with the goal of completing construction of the improvements by the end of 2016.

- The fabric of the canopy over both salt storage sheds has been torn in multiple places and should be repaired or replaced.
- Provide a roof structure over the existing filling station and provide a spill prevention kit readily accessible at the station.
- Silt fence or approved equivalent shall be provided around the sand storage structures and any other materials stockpiled in the future. Consideration may need to be given for stabilizing some areas near the salt storage bins to prevent rill and gully erosion from occurring.
- The woodchip stockpile, while currently stable, encroaches on the adjacent property, and its outer edges are at a near vertical slope. No additional chips should be placed at this location as failure of the slope could result.

6.0 MONITORING PROGRAM

The General Permit requires a standard monitoring program for registrants; however, certain sectors require a more detailed program given the sensitivity of the site usage. The permittee will comply with these sector-specific requirements in those areas of the facility where these sector-specific activities occur and where waste is exposed or potentially exposed to rainfall. These sector-specific requirements are in addition to any requirements specified elsewhere in the permit. Given the multiple sector specifications for the project site, the SWPPP includes additional plan requirements beyond those specified in Section 5(*d*).

Two types of ongoing site inspections will be performed. The first is periodic inspection of select areas. The second is a comprehensive site compliance evaluation. Site inspections will be completed by the Pollution Prevention Coordinator or his designee. Monitoring consists of site inspections, outfall inspections, and water quality sampling.

The Borough will maintain a site operating log. The logs will include records of date received, source of material, and designated storage. Up-to-date records of the facility operations will be maintained on site.

6.1 Site Inspections

6.1.1 Semiannual Inspections

The Borough shall conduct comprehensive site inspections no less frequently than twice a year. Inspections should be made during rainfall events if possible. Such evaluations shall include:

- Visual inspection of material handling areas and other potential sources of pollution identified in the plan for evidence of, or the potential for, pollutants entering the stormwater drainage system.

- Visual inspection of structural stormwater management measures, erosion control measures, and other structural pollution prevention measures.

- Visual inspection of spill response equipment.

Records shall be kept of all site inspections that summarize the scope of the inspection, personnel making the inspection, signature of the permittee, the date(s) of the inspection, major observations relating to the plan, actions taken, and updates made to the plan. All records shall be retained as part of the SWPPP for at least five years. A sample inspection form is included herein as Appendix F.

More frequent routine inspections should be completed at least monthly and shall include the visual inspection of all equipment and specific sensitive areas of the site. The evaluation should include a visual inspection of work areas, with particular emphasis on storage of materials in areas that may be exposed to rainwater. Records shall be kept on site that detail tracking or follow-up procedures. Other information that may be appropriate for record keeping includes:

- Maintenance performed
- Sampling type, location, volumes, etc.
- Observations of incidental site inspections
- Emergency conditions (spills, failures, etc.)
    - Time initiated and/or first detected
    - Nature of emergency
    - Effects on stormwater collection system and/or receiving stream
    - Corrective action taken
    - Authorities notified
    - Duration
    - Special sampling and results

- Other pertinent documentation

No emergencies have been reported at the site to date. If an emergency condition were to arise, records would be kept to properly report the incident to the appropriate parties and to provide a means of dealing with similar conditions in the future. If the emergency caused a violation of the General Permit, the CTDEEP would be notified. Any accelerated stormwater sampling or other information required to fully document and describe the condition would also be recorded.

6.2 Outfall Monitoring

6.2.1 Quarterly Monitoring

Visual monitoring of outfalls shall be completed on a quarterly basis. Sampling for DA-001 shall be taken from CB-2 (as shown on the appended site plan) and will be representative of the stormwater runoff from the western, developed portion of the site. Sampling representative of stormwater from the salt storage area shall be taken from an area of concentrated flow or a sampling pool shall be created using sand bags. Monitoring samples from each outfall shall be taken in a clean, clear glass or plastic container and examined in a well-lit area. If visual assessment indicates control measures are inadequate, the permittee must review and revise the selection, design, installation, and implementation of the control measure to ensure that the condition is eliminated and will not be repeated.

Parameter
Color (visual)
Odor
Clarity
Floating solids
Settled solids
Suspended solids
Foam
Oil sheen
Obvious indicators of stormwater pollution

6.2.2 Semiannual Monitoring

Water quality samples shall be taken on a semiannual basis. In addition to the standard monitoring required in "Monitoring" (Section 5(*e*)) for the given sector uses of the project site, the Borough is required to sample additional parameters under the same conditions as those required in Section 5(*e*). One semiannual sample shall be taken between October 1 and March 31, and the other shall be taken between April 1 and September 30. Semiannual samples shall be separated by at least 30 days. After four semiannual samples, if the average of four values for any parameter does not exceed the benchmark, the monitoring requirements for that parameter have been fulfilled for the permit term. The following parameters shall be evaluated:

Parameter	Benchmark
Sample pH (S.U.)	5-9
Rainfall pH (S.U.)	--
Total Iron (mg/l)	1.0
Chemical Oxygen Demand (mg/l)	75
Total Oil and Grease (mg/l)	5
Total Suspended Solids (mg/l)	--
Sample pH (S.U.)	5-9
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)	0.200
Aquatic Toxicity	Years 1 and 2

6.2.3 Annual Monitoring

The Connecticut DEEP Impaired Waters Monitoring Requirements Table identified Drainage Basin CT 6900-00-04 of the Naugatuck River as being impaired for habitat for fish, other aquatic life, and wildlife (cause unknown) and for recreation (bacteria). An approved Total Maximum Daily Load (TMDL) applies for this subbasin of the Naugatuck River. In accordance with Section 5.(e)(1)(D)(ii) of the General Permit and the Connecticut DEEP Impaired Waters Monitoring Requirements, outfalls may be sampled for this parameter on an annual basis if requested by the Connecticut DEEP.

2129-22-1-s911-2-rpt

APPENDIX A
Required Plan Certifications

Police Department and
Salt and Sand Storage Facility
Naugatuck, Connecticut

Certification of the

Stormwater Pollution Prevention Plan

The following certification shall be signed by a professional engineer licensed to practice in Connecticut or a Certified Hazardous Materials Manager.

"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 on October 1, 2011. I am aware that there are significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

Signature

9-15-11

Date

Nicole Burnham

Name

Associate

Title

20928 CT

P.E. Number (if applicable)

Certification of the
Nonstormwater Discharges

The following certification shall be signed by a professional engineer licensed to practice in Connecticut or a Certified Hazardous Materials Manager.

"I certify that in my professional judgment, the stormwater discharge from the site consists only of stormwater*, or of 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 ground water discharges such as pumped ground water, foundation drains, water from crawl space pumps, and footing drains
- Discharges of uncontaminated air conditioner or refrigeration condensate
- Water sprayed for dust control or at a truck load wet-down station
- Naturally occurring discharges such as rising 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 nonstormwater at the site, a description of the results of any test and/or evaluation for the presence of nonstormwater discharges, the evaluation criteria or testing method used, the date of 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 drain 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."

Signature _____ Date 9-15-11

Nicolle Burnham Associate

Name Title

20928 CT

P.E. Number (if applicable)

*Following implementation of the recommendations in Section 5.0 of the SWPPP.

APPENDIX B
Spill & Leak Reporting Form
Summary of Chemicals Stored On Site

Police Department and
Salt and Sand Storage Facility
Naugatuck, Connecticut

SPILL & LEAK REPORTING FORM
POLICE DEPARTMENT AND SAND AND SALT STORAGE FACILITY

Date	(check one)		Location (see map)	Description				Response Procedures	Corrective Measures Taken
	Spill	Leak		Type of Material	Quantity	Source	Reason		

SUMMARY OF CHEMICALS STORED ON SITE

Material	Purpose/ Description/ Tank Size/ AST/UST	Location (Drainage Area)	Quantity Stored (Estimated)	Exposed in Last Three Years		Likelihood of Contact with Stormwater	Known Past Significant Spills/Leaks	
				Yes	No		Yes	No
Unleaded gasoline	5-gal. containers	001	20 gallons		✔	Possible from overfilling of tank or truck.		✔
Unleaded gasoline	AST – ConVault	001	8,000 gallons		✔	Possible from overfilling of tank or truck.		✔
Motor oil	1-gal. and ¼-gal. containers	001	20 gallons		✔	None. Stored in Municipal Garage.		✔
Automatic transmission fluid	¼-gal. containers	001	5 gallons		✔	None. Stored in Municipal Garage.		✔
Antifreeze	1-gal. containers	001	5 gallons		✔	None. Stored in Municipal Garage.		✔
Windshield washer fluid	1-gal. containers	001	25 gallons		✔	None. Stored in Municipal Garage.		✔
Waste motor Oil	Drum	001	55 gallons		✔	None. Stored in Municipal Garage.		✔
Road paint	5-gal. containers	001	300 gallons		✔	None. Stored in Municipal Garage.		✔
Spray paint	Cans	001	20 cans		✔	None. Stored in Municipal Garage.		✔
Paint	1-gal. cans	001	10 gallons		✔	None. Stored in Municipal Garage.		✔
Bar and chain oil	1-gal. containers	001	2 gallons		✔	None. Stored in Municipal Garage.		✔
Brake cleaner, carb cleaner, spray oil	Spray cans	001	30 cans		✔	None. Stored in Municipal Garage.		✔
Car wash soap	1-gal. containers	001	6 gallons		✔	None. Stored in Municipal Garage.		✔
Paint thinner	1-gal. containers	001	2 gallons		✔	None. Stored in Municipal Garage.		✔
Sand salt storage mix	Stockpile	003, 004	600 tons	✔		Possible. Stored in structure with open sides.		✔
Ice control salt	Stockpile	003, 004	125 tons	✔		Possible. Stored in structure with open sides.		✔
Treated salt	Stockpile	003, 004	250 tons	✔		Possible. Stored in structure with open sides.		✔

Note: AST = Aboveground storage tank, UST = Underground storage tank

APPENDIX C
Sample Inspection Reporting Form

Police Department and
Salt and Sand Storage Facility
Naugatuck, Connecticut

COMPLIANCE INSPECTION FORM

NAUGATUCK SALT/SAND STORAGE FACILITY

Inspection Completed By:_____

Date of Inspection:_____Weather Conditions:_____

1. Catch Basins Inspected? _____Yes _____ No
   Maintenance Needed? _____Yes _____ No
   Action Taken: _____

2. Gutters Inspected? _____Yes _____ No
   Maintenance Needed? _____Yes _____ No
   Action Taken: _____

3. Paved Areas in Need of Sweeping? _____Yes _____ No
   Action Taken: _____

4. Bituminous and Wood Chip Stockpiles Inspected? _____Yes _____ No
   Evidence of Erosion? _____Yes _____ No
   Maintenance Needed? _____Yes _____ No
   Action Taken: _____

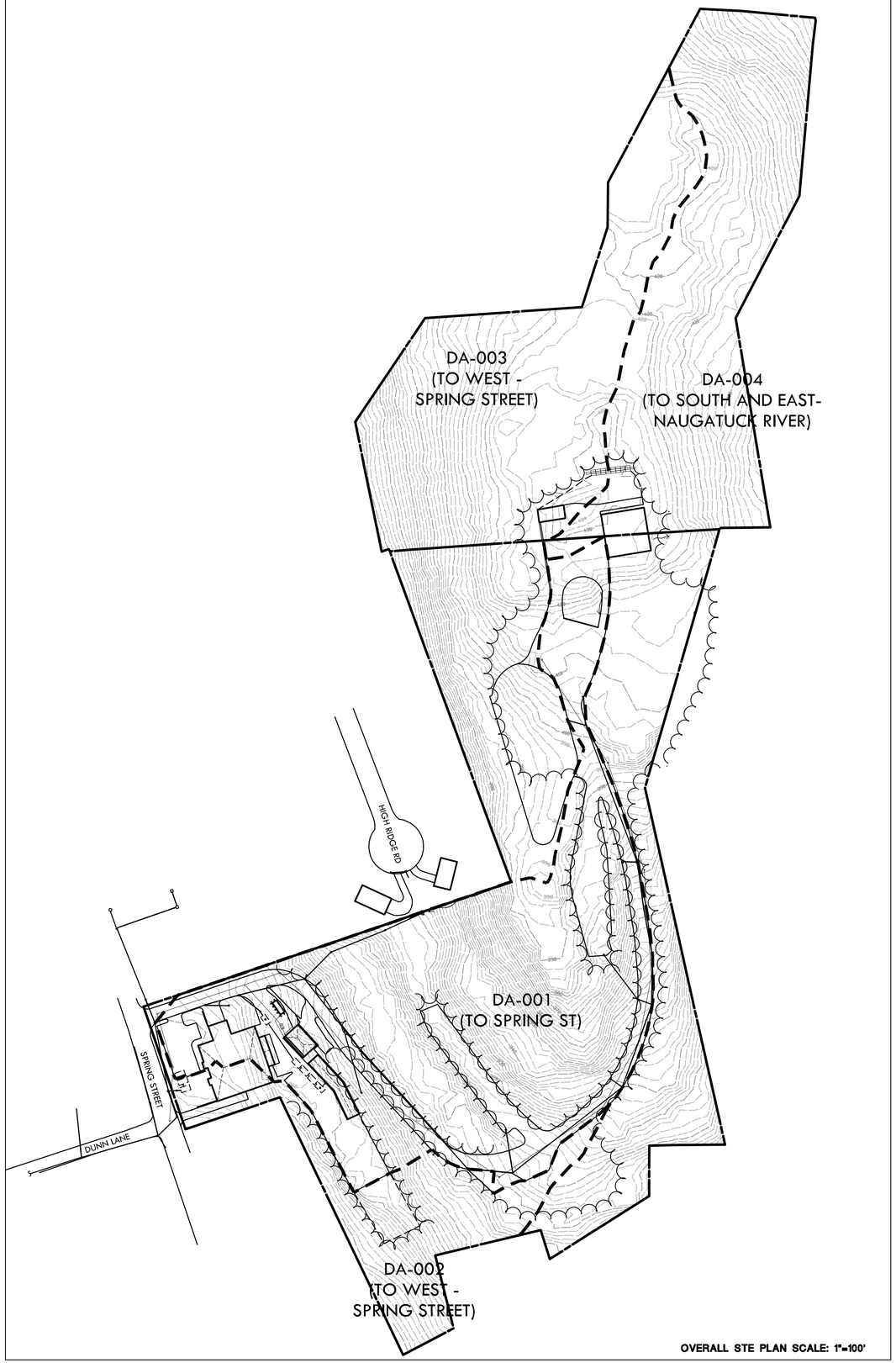
5. Salt Storage Inspected? _____Yes _____ No
   Are Piles Covered? _____Yes _____ No
   Action Taken: _____

6. Oil/Water Separator Inspected? _____Yes _____ No
   Is Routine Cleaning needed? _____Yes _____ No
   Action Taken: _____

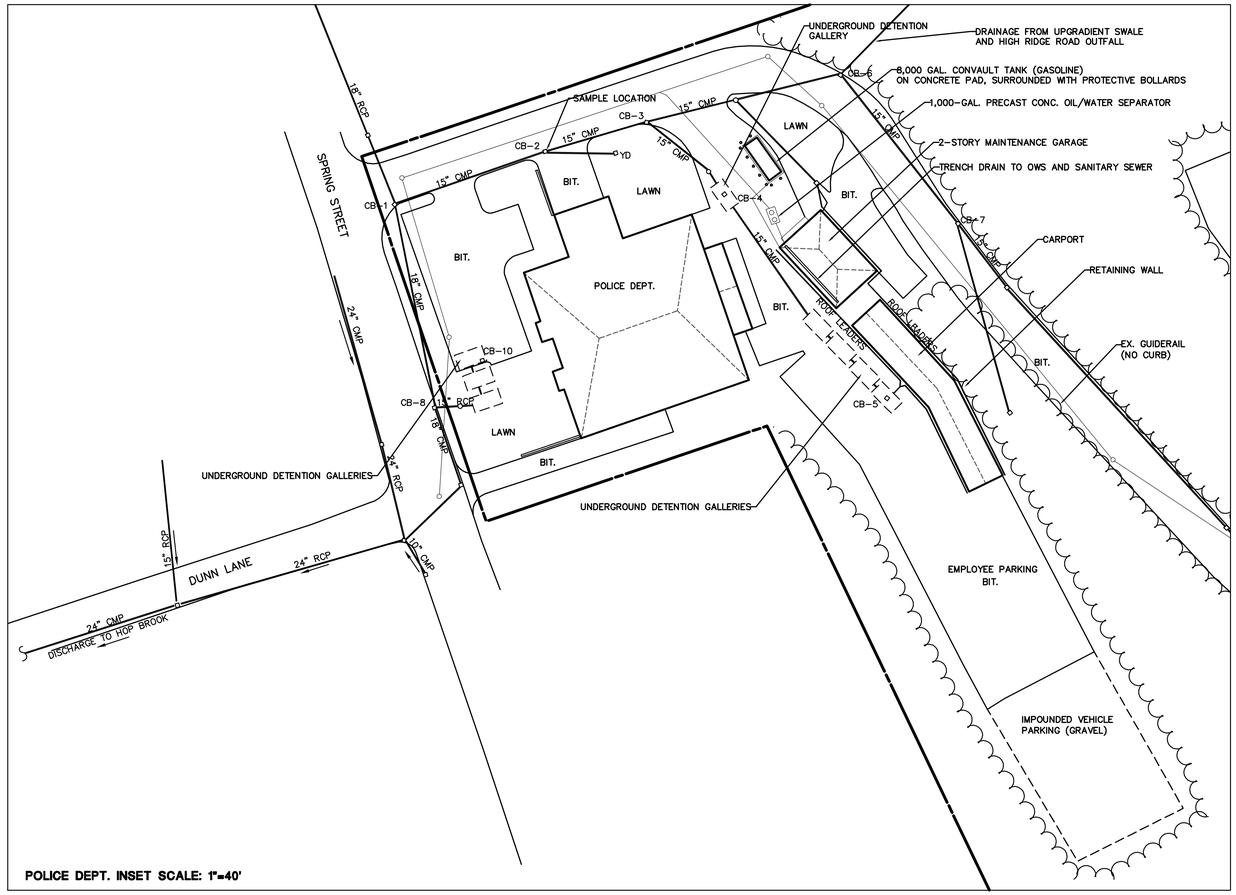
SIGNATURE:_____ DATE:_____

APPENDIX D
Site Plan

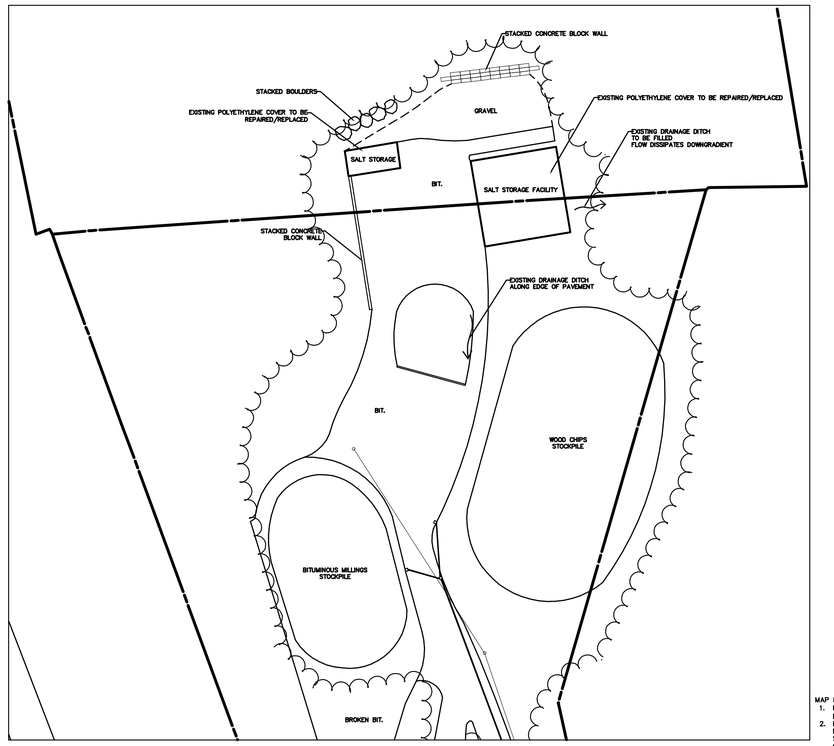
Police Department and
Salt and Sand Storage Facility
Naugatuck, Connecticut



OVERALL STE PLAN SCALE: 1"=100'



POLICE DEPT. INSET SCALE: 1"=40'



SALT STORAGE INSET SCALE: 1"=60'

MAP REFERENCES:
1. MAPPING OF "THE HEIGHTS" PROVIDED BY BOROUGH OF NAUGATUCK, DATED FEBRUARY 1982, SCALE: 1"=40'
2. PROPOSED STORAGE BUILDING AND CARPORT SPRING STREET NAUGATUCK, CONNECTICUT PREAPRED FOR NAUGATCUK POLICE STATION, 211 SPRING STREET, NAUGATUCK, CONNECTICUT; SHEET NAME SP-1; DATE: 5/24/02; SCALE: 1"=20'; BY PUSTOLA & ASSOCIATES.
3. CONNECTICUT DEP PARCEL MAPPING.
4. 2004 LIDAR DATASET FROM CONNECTICUT DEP.

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REVISIONS

SITE PLAN

POLICE DEPT. AND SALT/SAND STORAGE FAICLITY
INDUSTRIAL STORMWATER PERMIT

211 SPRING STREET
NAUGATUCK, CONNECTICUT

--	BAM	NB
DESIGNED	DRAWN	CHECKED

SCALE AS NOTED

DATE AUGUST 2011

PROJECT NO. 2129-22

SHEET IN SET 1 OF 1

SP-1

SHEET NO.