Town of Branford
Small Municipal Separate Storm Sewer System
Management Plan and Annual Report

December 19, 2016

Prepared by: Janice A. Plaziak, Town Engineer

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Section A

Overview of Plan and Contact Information

Date Prepared: 12/19/16

For questions regarding this report contact:
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Branford, CT 06405

Stormwater Program Permit Information

1. Permitting Authority: Connecticut DEEP
2. Permit Number: Unknown
3. Permit Type: General
4. Permit Name: Town of Branford MS4
5. Date Issue: 1/9/2011
6. Date Expire:

General Information for MS4 Operator

1. Operator Name: James B Cosgrove
2. Operator Title: First Selectman
3. Represented Entity: Town of Branford
4. Mailing Address: P. O. Box 150, 1019 Main Street
5. Mail City, State, Zip: Branford, CT 06405
6. Phone Number: (203) 488-8394
7. E-Mail Address: jcosgrove@branford-ct.gov
8. Co-Permitting With:
9. Population: 28,683 **Households:** 13,342 **Area (sq mi):** 28
10. Official Website: www.branford-ct.gov

General Information for Primary Contact Person

1. Name: Janice A. Plaziak, P.E.
2. Title: Town Engineer
3. Phone Number (203) 315-0606
4. E-Mail Address: jplaziak@branford-ct.gov

General Information for Secondary Contact Person

1. Name: Daniel Gregory
2. Title: WWTP Superintendent
3. Phone Number: (203) 315-3125
4. E-Mail Address: dgregory@branford-ct.gov

General Information for Receiving Waters

Receiving Water Lists: Listed below are all the identified receiving waterbodies to which identified outfalls discharge.

Receiving Streams (creek, stream, river, etc.)	Receiving Waterbodies (lake, wetland, ocean, etc.)	Receiving Watersheds
Branford River	Long Island Sound	Branford River
Farm River		Farm River
		South Central Shoreline

Section B

Details of Minimum Control Measures, BMPs and Work Performed with Responsible Party Assignments

Public Participation/Involvement

Descriptive Text:
To satisfy this minimum control measure, the operator of a regulated small MS4 must:

1. Comply with applicable State, and local public notice requirements; and

2. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

The public can provide valuable input and assistance to a regulated small MS4's municipal storm water management program and, therefore, the public should be given opportunities to play an active role in both the development and implementation of the program. An active and involved community is crucial to the success of a storm water management program because it allows for:

1. Broader public support since citizens who participate in the development and decision making process are partially responsible for the program and, therefore, may be less likely to raise legal challenges to the program and more likely to take an active role in its implementation;

2. Shorter implementation schedules due to fewer obstacles in the form of public and legal challenges and increased resources in the form of citizen volunteers;

3. A broader base of expertise and economic benefits since the community can be a valuable, and free, intellectual resource; and

4. A conduit to other programs as citizens involved in the storm water program development process provide important cross-connections and relationships with other community and government programs. This benefit is particularly valuable when trying to implement a storm water program on a watershed basis.

Number of BMPs associated with control measure: 4

Important Dates:
Earliest Start Date: 1/9/2011

End Date:

Details of BMPs and Work Performed for Them

A. Public Involvement/Participation

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date:

BMP Description and work performed:
A separate citizen panel is no longer feasible. Branford is fortunate to have very active and informed boards and commissions which work collectively to address stormwater issues along with Town staff. During public meetings regarding Zoning and Subdivision Regulation revisions we had good public input on storm water management.

Has Goal Been Accomplished: YES and ongoing

B. Public Information

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Notify citizens of public meetings in several different media and with flyers.
Provide annual report to Representative Town Meeting. Provide information on town web site.

The Town of Branford adopted an ordinance which makes it unlawful to discharge stormwater to public roads and sidewalks in an effort to deal with nuisance discharges which cause public safety problems. This ordinance was adopted by the RTM in 2006 and brought about a discussion about stormwater management and the need for the Town to adopt an illicit discharge ordinance in the near future. Staff has explored some possible illicit discharge ordinances but has not found a model ordinance or language which is manageable. Staff and elected officials have begun work on a draft ordinance in 2010. A final ordinance has not yet been presented to the RTM as enforcement of the ordinance is problematic with existing staffing levels.

The Solid Waste page of the Town's website now has a specific stormwater link plus proper paint disposal, oil disposal and use of HazWaste Central information. There is also a link to the DEP factsheet about not having outdoor carwashes.

Information booth provided environmental and stormwater information at Branford Festival with the Branford Land Trust and Branford Conservation and Environment Commission, as well as the Branford River Project and the Friends of the Farm River.

Has Goal Been Accomplished: YES and ongoing

C. Branford River Watershed Clean-ups and Farm River Clean-ups
Responsible Party: Branford River Project and Friends of the Farm River

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Using volunteers for Branford River Watershed clean-up and Farm River clean-ups will give citizens first-hand knowledge of the impact of littering on local water bodies and provide an educational opportunity.
Using volunteers for water quality monitoring will give citizens first-hand knowledge of the quality of local water bodies and provide a cost effective means of collecting water quality data.
Involve a certain percentage of the community through this organization to help in watershed clean-ups.

Has Goal Been Accomplished: YES and ongoing

D. Community Clean-ups
Responsible Party: Branford Litter Committee

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Involve the community through organizing an annual community clean-up in April.

Has Goal Been Accomplished: YES and ongoing

Public Education and Outreach

Descriptive Text:

To satisfy this minimum control measure, the operator of a regulated small MS4 needs to:

1. Implement a public education program to distribute educational materials to the community, or conduct equivalent outreach activities about the impacts of storm water discharges on local waterbodies and the steps that can be taken to reduce storm water pollution; and

2. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

An informed and knowledgeable community is crucial to the success of a storm water management program since it helps to ensure the following:

1. Greater support for the program as the public gains a greater understanding of the reasons why it is necessary and important. Public support is particularly beneficial when operators of small MS4s attempt to institute new funding initiatives for the program or seek volunteers to help implement the program; and

2. Greater compliance with the program as the public becomes aware of the personal responsibilities expected of them and others in the community, including the individual actions they can take to protect or improve the quality of area waters.

Number of BMPs associated with control measure: 4

Important Dates:

Earliest Start Date: 1/9/2011

End Date: ongoing

Details of BMPs and Work Performed for Them

A. Branford Festival Outreach

Responsible Party: Conservation and Environment Commission, Branford River Project and Friends of the Farm River

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Booth for educational materials and public outreach maintained at Branford Festival in June for Conservation and Environment Commission, Branford River Project and Friends of Farm River.

Has Goal Been Accomplished: YES and ongoing

B. Town Boards and Commissions Outreach

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Meet with other town boards and commissions to discuss the importance of the storm water management plan and work to implement goals of plan.
Assist town staff with information to stress importance of implementation of plan and insure proper funding of various departments to meet plan goals.
Including stormwater BMPs in new Zoning and Subdivision Regulations.

Has Goal Been Accomplished: YES and ongoing

C. Storm Drain Stenciling

Responsible Party: unknown

Start Date: 1/9/2011 End Date: 1/9/2013

BMP Description and work performed:
Label storm drains with materials provided by DEP and other sources for education on discharges to Branford River, Farm River and Long Island Sound. Some work was done in the past. Due to liability issues, no additional work has been done lately but we are hopeful to get more done in the future.

Has Goal Been Accomplished: YES

D. Stormwater Notification number

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date: 1/9/2013

BMP Description and work performed:
Create and publicize stormwater notification number for citizen reports on polluters and for responding to citizen questions on stormwater issues. The Engineering Department will log complaints and route to appropriate departments for review. A review of procedures is undertaken each year to insure that any report is effectively investigated and resolved as required

Has Goal Been Accomplished: YES and ongoing

Illicit Discharge Detection and Elimination

Descriptive Text:

Recognizing the adverse effects illicit discharges can have on receiving waters, the final rule requires an operator of a regulated small MS4 to develop, implement and enforce an illicit discharge detection and elimination program. This program must include the following:

1. A storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;

2. Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, or local law) on non-storm water discharges into the MS4, and appropriate enforcement procedures and actions;
3. A plan to detect and address non-storm water discharges, including illegal dumping, into the MS4;

4. The education of public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and

5. The determination of appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

Discharges from MS4s often include wastes and wastewater from non-storm water sources. A significant portion of these dry weather flows were from illicit and/or inappropriate discharges and connections to the MS4. Illicit discharges enter the system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drains) or indirect connections (e.g., infiltration into the MS4 from cracked sanitary systems, spills collected by drain outlets, or paint or used oil dumped directly into a drain). The result is untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria to receiving waterbodies. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic, wildlife, and human health.

Number of BMPs associated with control measure: 4

Important Dates:

Earliest Start Date: 1/9/2011

End Date: ongoing

Details of BMPs and Work Performed for Them

A. Detection and Elimination

Responsible Party: Public Works Director

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Building on work performed in the previous years, illicit discharges will be detected and eliminated as feasible. Detection and elimination efforts will be documented so that an end of year report will detail all illicit discharges that were found, which ones were eliminated and what remedial actions were taken.

Minor problems addressed. No obvious illicit discharges found to date.

Has Goal Been Accomplished: YES and ongoing

B. Storm Sewer System Map

Responsible Party: Janice Plaziak, Town Engineer along with Public Works Director

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
The storm sewer system map is meant to demonstrate a basic awareness of the intake and discharge areas of the system. It is needed to help determine the extent of discharged dry weather flows, the possible sources of the dry weather flows, and the particular waterbodies these flows may be affecting. An existing map on which the location of major pipes and outfalls can be clearly presented demonstrates such awareness.

The Town of Branford has mapped most of the storm drainage system on town highways and added it to the GIS system. All existing information on outfall locations and facilities have been reviewed and then field verified. The GIS system is updated regularly.

Has Goal Been Accomplished: YES and ongoing

C. Stormwater Ordinance

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Research statuatory authorization and model stormwater ordinances to determine bestway to regulate stormwater practices. This ordinance might include appropriate enforcement procedures and actions such as fines and civil penalties. If deemed appropriate, draft local ordinance and

propose to Representative Town Meeting for adoption. A draft ordinance was started in 2010 with no adoption at this time.

Has Goal Been Accomplished: NO

D. Train Employees and Interested Volunteers
Responsible Party: Diana Ross, Enforcement Officer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Design and administer a training program to employees that will help them to identify illicit discharges. Research continues on ordinance implications. No training will be undertaken until the ordinance-related issues have been addressed.

Has Goal Been Accomplished: NO

Pollution Prevention/Good Housekeeping

Descriptive Text:

Recognizing the benefits of pollution prevention practices, the rule requires an operator of a regulated small MS4 to:

1. Develop and implement an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system;

2. Include employee training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. To minimize duplication of effort and conserve resources, the MS4 operator can use training materials that are available from EPA, their State, or relevant organizations;

3. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

The Pollution Prevention/Good Housekeeping for municipal operations minimum control measure is a key element of the small MS4 storm water management program. This measure requires the small MS4 operator to examine and subsequently alter their own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. While this measure is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the small MS4 operator, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

Number of BMPs associated with control measure: 5

Important Dates:

Earliest Start Date: 1/9/2011

End Date: ongoing

Details of BMPs and Work Performed for Them

A. Employee Training

Responsible Party: Public Works Director

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Develop a collection of training materials and a program that will be used to educate employees of appropriate departments about pollution prevention and good housekeeping. These resources will come from applicable external sources, such as the EPA, and may be supplemented with materials developed by the Town. Train staff on pollution prevention and good housekeeping using the materials. Training has occurred and is ongoing.

Has Goal Been Accomplished: YES and ongoing

B. Information Management System

Responsible Party: Janice Plaziak, Town Engineer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
An information management system will be put in place that can be used to track the inventory of stormwater facilities and outfalls. This system will be used by staff to schedule and perform inspections, maintenance activities and document any other actions taken on these inventory items.

Has Goal Been Accomplished: NO

C. Maintenance Program

Responsible Party: Public Works Director

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Identify the number of facilities and controls that have received maintenance as a result of the goal 'Maintenance Schedule'. Document the overall compliance with the schedule and explain any discrepancies. Streets are swept annually and catch basins are cleaned regularly. Develop program to insure necessary cleaning and/or inspection of all storm drains on an annual basis Insure all storm drains are cleaned or evaluated for appropriate cleaning cycle. Finalize the maintenance plan and schedule that will be put in place for management of BMPs. Approximately 1400 catchbasins were cleaned during fiscal year 2016. Approximately 52 miles of road were swept with the center of town being swept at least 2 times.

Has Goal Been Accomplished: YES and ongoing

D. Branford Landfill
Responsible Party: Solid Waste Manager

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Ongoing monitoring activities to insure no adverse impacts on stormwater and groundwater. Maintenance and testing are on-going to minimize any impacts. The Landfill has now been closed and capped. Work is now completed on the stormwater management system for the closed landfill and Ecology Park has been built at the top of the landfill for passive recreational use.

Has Goal Been Accomplished: YES and ongoing

E. Drainage Improvements
Responsible Party: Public Works Director

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Ongoing replacement of failing stormwater drainage infrastructure as part of our road improvement program. Added sumps in catchbasins. The Town improved roadway drainage on Pleasant Point Road which had been causing erosion, we added a catchbasin and underground infiltrating units.

Has Goal Been Accomplished: YES and ongoing

Construction Site Runoff Control

Descriptive Text:

The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from construction activities that result in a land disturbance of greater than or equal to one acre.

The small MS4 operator is required to:
1. Have an ordinance or other regulatory mechanism requiring the implementation of proper erosion and sediment controls, and controls for other wastes, on applicable construction sites;
2. Have procedures for site plan review of construction plans that consider potential water quality impacts;
3. Have procedures for site inspection and enforcement of control measures;
4. Have sanctions to ensure compliance (established in the ordinance or other regulatory mechanism);
5. Establish procedures for the receipt and consideration of information submitted by the public; and
6. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

Polluted storm water runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams. Of the pollutants listed in Table 1, sediment is usually the main pollutant of concern. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to our nation's waters. For example, excess sediment can quickly fill rivers and lakes, requiring dredging and destroying aquatic habitats.

Table 1
Pollutants Commonly Discharged From Construction Sites

Sediment
Solid and sanitary wastes
Phosphorous (fertilizer)
Nitrogen (fertilizer)
Pesticides
Oil and grease
Concrete truck washout

Number of BMPs associated with control measure: 2

Important Dates:
Earliest Start Date: 1/9/2011
End Date: ongoing

Details of BMPs and Work Performed for Them

A. Begin Inspection Program
Responsible Party: Inland Wetlands Enforcement Officer & Zoning Enforcement Officer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Random inspections of construction sites will be performed to determine the overall compliance rate that is being achieved by construction operators. Insure sediment and erosion controls are in place prior to first site disturbance. Exception shall only be on sites which have little or no potential for erosion. The Inland Wetlands Commission has revised their regulations to include the requirements of storm water best management practices both during construction and at completion of a project. The commission has also included the requirement for outside monitoring of erosion control measures and construction activities to be reported by an outside engineering company on several projects to augment the Town's limited personnel in doing such inspections. Zoning and Subdivision Regulation updates are also including Erosion Control BMPs.

Has Goal Been Accomplished: YES and ongoing

B. Ordinance / Regulatory Mechanism
Responsible Party: Town Planner

Start Date: 1/9/2011 End Date: 1/9/2013

BMP Description and work performed:
Under the extent allowable by law an ordinance or other regulatory mechanism will be put in place that will provide the ability to regulate polluted runoff that emanates from construction sites.
The Inland Wetlands Commission has revised their regulations to include the requirements of storm water best management practices both during construction and at completion of a project. The commission has also included the requirement for outside monitoring of erosion control measures and construction activities to be reported by an outside engineering company on several projects to augment the Town's limited personnel in doing such inspections.
The Planning and Zoning Commission has adopted the most recent Erosion and Sedimentation State Regulations as well as updated the Planning and Zoning regulations to include

BMPs for Storm Water Management. New regulations were adopted and in effect June 2011.

Has Goal Been Accomplished: YES

Post-Construction Runoff Control

Descriptive Text:

The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in post-construction runoff to their MS4 from new development and redevelopment projects that result in the land disturbance of greater than or equal to 1 acre. The small MS4 operator is required to:
1. Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs);
2. Have an ordinance or other regulatory mechanism requiring the implementation of post-construction runoff controls to the extent allowable under State, or local law,
3. Ensure adequate long-term operation and maintenance of controls;
4. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

Post-construction storm water management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly effect receiving waterbodies. Many studies indicate that prior planning and design for the minimization of pollutants in post-construction storm water discharges is the most cost-effective approach to storm water quality management.

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post-construction runoff impact occurs by increasing the quantity of water delivered to the waterbody during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include streambank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

Number of BMPs associated with control measure: 4

Important Dates:

Earliest Start Date: 1/9/2011 End Date: ongoing

Details of BMPs and Work Performed for Them

A. Identification of BMPs - Inland Wetlands

Responsible Party: Inland Wetlands Enforcement Officer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Identify and develop a mix of Structural and Non-Structural BMPs that are appropriate for a Connecticut coastal community. This BMP list will include BMPs suited for both redevelopment and new development. These BMPs will also be used in the 'Construction Site Runoff Control' minimum measure. Using the previous years construction permit records perform conduct an analysis of development projects that compares impervious and non-impervious surface development. Use this information to develop an average for the typical construction project that states what percentage of the project is converted into impervious area. This information should also be used to help determine your list of BMPs.

Has Goal Been Accomplished: YES and ongoing

B. Identification of BMPs - Planning and Zoning

Responsible Party: Town Planner

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Identify and develop a mix of Structural and Non-Structural BMPs that are appropriate for a Connecticut coastal community. This BMP list will include BMPs suited for both redevelopment and new development. These BMPs will also be used in the 'Construction Site Runoff Control' minimum measure. Using the previous years construction permit records conduct an analysis of development projects concerning impervious surface. This information should also be used to help determine the list of BMPs. The Land Use Departments are now holding monthly site plan review meetings in which storm water is one area which is being reviewed as a group. The Land Use Departments continue to require storm water management BMPs and maintenance plans for proposed developments. Impervious surface percentages were reduced in the new Planning & Zoning Regulations adopted in June 2011.

Has Goal Been Accomplished: YES and ongoing

C. Review of Site Plans – Inland Wetlands and Planning & Zoning

Responsible Party: Inland Wetlands Enforcement Officer

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
All applications to Inland Wetlands are reviewed prior to approval for utilization of BMPs for the

specifics of the development of each site. Suggestions for plan improvement are made to the applicant and incorporated as necessary.
Inland Wetlands Commission utilizes following criteria for plan and permit request reviews:
1. No net loss of wetlands
2. Attempt to retain first inch of runoff on site
3. Work to improve water quality
The Wetlands Enforcement Officer and the Town Engineer have worked together in reviewing development applications, requiring retention or infiltration of the first inch of runoff as well as the inclusion of storm water quality improvement structures and maintenance schedules. The Land Use Departments are now holding monthly site plan review meetings in which storm water is one area which is being reviewed as a group. The Land Use Departments continue to require storm water management BMPs and
maintenance plans for proposed developments.

Has Goal Been Accomplished: YES and ongoing

D. Reduced Impervious Areas
Responsible Party: Town Planner

Start Date: 1/9/2011 End Date: ongoing

BMP Description and work performed:
Identify new impervious areas that are attributable to new development projects.
Review applicable regulations to determine necessary modifications to meet goals of reduced amounts of impervious surface. Revisions of regulations concerning impervious surface and parking reductions have been adopted into the Planning & Zoning Regulations June 2011.

Has Goal Been Accomplished: YES, and ongoing