

# 2024 Annual Report – MS4 General Permit

**Town of Somers**

Somers, Connecticut

May 2025



Prepared by:

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**MS4 General Permit**  
**Town of Somers 2024 Annual Report**  
**Permit Number GSM 000103**

January 1, 2024 – December 31, 2024

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This report documents The Town of Somers's efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2024 to December 31, 2024.

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

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

**1.1 BMP Summary**

BMP	Activities in current reporting period	Sources Used	Method of Distribution	Audience (and number of people reached)	Measurable Goal	Department / Person Responsible	Additional details
1-1 Implement public education and outreach	Links to educational materials remained available through the Town's stormwater (SW) website and published through the annual Somers Connection Magazine	EPA, CT DEEP, CT NEMO, USGS	Online (Town website)	Town residents	Update and maintain Town website to include educational materials.	Public Works (DPW)	<ul style="list-style-type: none"> <li>• "Clean Waters Starting in Your Home and Yard: Animal Waste and Water Quality"</li> <li>• "How to Care for Your Septic System"</li> <li>• "Ground Water and Drinking Water: Basic Information about Your Drinking Water"</li> <li>• "Introduction to Integrated Pest Management"</li> <li>• "Managing Your Household Chemicals"</li> <li>• "Don't Trash Grass!"</li> <li>• "EPA SW Information: National Pollutant Discharge Elimination System (NPDES)"</li> <li>• "EPA's Soak Up the Rain"</li> <li>• "CTDEEP: SW and Water Quality"</li> <li>• "CT NEMO Program"</li> <li>• "USGS Dictionary of Water Terms"</li> </ul>
1-2 Address education/outreach for Pollutants of Concern (POC)	875 dog licenses were distributed in 2024 with educational materials.	CT Sea Grant	Fact sheets distributed with dog licenses.	Dog owners	Educate dog owners about dog waste.	DPW, Town Clerk's Office	A fact sheet is now distributed with every new dog license issued. A link to "Clean Waters Starting in Your Home and Yard: Animal Waste and Water Quality" remains available through the Town's SW website.
1-3 Install and Maintain "No Dumping" Signs	"No Dumping" signs were maintained on Durkee Road	N/A	N/A	Town residents, visitors to Durkee Road	Make and install signs at stream or lake access points.	DPW	Durkee Rd is in the watershed of the impaired Gillettes Brook.

1-4 Annual Update to Board of Selectmen	An annual update on MS4 Permit compliance was provided to Board of Selectmen in 2024	M/A	N/A	Board of Selectmen	Provide info update to Board of Selectmen annually.	DPW	Reason for addition: Keeping the Board of Selectmen informed of efforts towards MS4 Permit compliance helps to build understanding of and financial support for continued progress.
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## 1.2 Describe any Public Education and Outreach activities planned for the next year, if applicable.

Town anticipates the following activities in 2025:

- Continue making updates on MS4 progress and SW management to community groups, including Open Space and Trails Committee, Cub Scouts, and other groups.
- The Town employed a part-time Land Use Technician who maps the Town's outfalls and MS4 program, providing connectivity between the MS4 program and the Town schools.
- Continue the Paint Care recycling program at the Town Recycling Center on the first Saturday of the month from April through November.
- Continue to release Somers Connection Magazine annually to approximately 4,200 households.

## 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	Date completed or projected completion date	Location Posted	Additional details
2-1 Final Stormwater Management Plan publicly available	Complete	Draft and final SW Management Plan (SWMP) was made available electronically on the Town website and through hard copy in the Town offices. Notice of availability was published on the Town website.	Make draft SWMP available on Town website and paper copies available in Town offices. Publish notice of availability on website or local newspaper.	Public Works, Land Use	Apr 3, 2017	Town offices – 600 Main St, Somers, CT 06071 (physical copies) Town website	Three copies of plan were taken during the reporting period, but no comments were received. <a href="https://www.somersct.gov/town-departments/public-works-department/stormwater">https://www.somersct.gov/town-departments/public-works-department/stormwater</a> The final SWMP was made available on 4/4/17
	Complete				Jul 1, 2017	Town Hall and Library	
2-2 Comply with public notice requirements for Annual Reports (annually by 2/15)	Complete	Notice of annual report posted to Town SW website on 3/11/24. Draft annual report posted to Town website and made available from 3/11/24 to 4/25/24. If any public comments are received that require a response or amendment to this report, an updated version will be submitted.	Make draft Annual Report available electronically on Town website and paper copies available in Town Hall and library. Publish notice of availability on website or local newspaper.	Public Works, Land Use	May 19, 2025	Town website	<a href="https://www.somersct.gov/2023-annual-stormwater-ms4-report-notice/">https://www.somersct.gov/2023-annual-stormwater-ms4-report-notice/</a>
2-3 Stormwater Committee Meetings	Complete	SW Committee consists of Todd Rolland, Director of Public Works, and Daniel Parisi.	Form a SW Committee	SW Coordinator (DPW Director or designee).	2017 Ongoing through 2020; currently dormant.	N/A	SW Committee is an informal group of town employees with responsibilities related to SW.
	Ongoing	The SW Committee has been dormant due to changes among Town staff.	Hold annual meetings of the SW Committee.			N/A	

2-4 Sponsor Community Participation Events	Ongoing	<ul style="list-style-type: none"> <li>Household Hazardous Waste Outreach Days</li> <li>Paint Care Program Days occurred on the</li> <li>The Department of Public Works supported clean up events by providing materials and trash pick up. In 2024, the Town supported Open Space and Trail Committee clean up.</li> </ul>	Hold/sponsor two community participation events per year.		Ongoing annually	Town website	HazWaste Outreach Days on publicized and held monthly in Manchester and 9/30 in Somers. Paint Care Program 1 <sup>st</sup> Sat of each month from Apr thru Nov at Recycling Center. 235lbs of trash were collected during Earth Day event.
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## 2.2 Describe any Public Involvement/Participation activities planned for the next year, if applicable.

- The Town will continue to sponsor community participation events, including Household Hazardous Waste Outreach Days and Paint Care Recycling Program Days.
- An annual clean-up is planned to be held by the Open Space and Trails Committee.
- Paint Care Days will occur on the first Saturday of each month beginning in April and running through November.

## 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	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program (Due 7/1/19)	Complete		Prepare written IDDE Plan	DPW, Land Use	9/1/18	
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas (Due 7/1/20)	In progress	Town continues to update their existing SW system mapping, which is ~90% complete. Progress has been delayed due to staffing changes.	Update GIS MS4 mapping to include all SW outfalls in the municipality.	DPW, Land Use	Anticipate completing as funds and staffing are available. Started in 2019.	A part-time employee was hired to assist with mapping efforts.
	In Progress	Town SW mapping is ~90% complete. The Town conducts inspections with digital checklist and continues to update mapping with detailed information on pipes. Progress continues to be impacted by staffing changes.	Develop a list (database or spreadsheet) including required elements listed on page 24 of 50 of the General Permit for all SW outfalls in municipality.			
	In Progress	Town continues to update their existing storm system mapping, which is ~90% complete. Progress continues but has been slow due to staffing changes.	Update GIS storm system mapping in priority areas to include required elements listed on pages 3 & 4 in Appendix B of the General Permit including catchment delineations.		Anticipate completing as funds are available. Started in 2019.	
3-3 Implement citizen reporting program (Ongoing)	Complete	No complaints related to IDDE were received in 2024	Maintain Citizen Action Line and provide notice of the hotline on Town website.	DPW, Land Use	Jul 1, 2017	The Town handles citizen reporting through its Citizen Action Line,

						available on the Town website.
3-4 Establish legal authority to prohibit illicit discharges (Due 7/1/19)	Complete		Develop ordinance	DPW, Land Use Legal, BOS	Mar 22, 2019	
3-5 Develop record keeping system for IDDE tracking (Due 7/1/17)	Complete	Somers will keep a record of illicit discharge abatement activities including location (including latitude and longitude or address), description, date(s) of inspection, sampling data (if applicable), action(s) taken, date of removal or repair and responsible party.	Develop record-keeping for IDDE abatement activities	DPW, Land Use	Dec 31, 2017	
3-6 Address IDDE in areas with pollutants of concern	Not started	No progress was made this year due to a lack of funding. DPW requests funding for this work annually during the Town budget process but funds have not been granted.			Anticipate completing as funds are available.	
3-7 Conduct SSO Inventory	Complete	Completed inventory. No SSOs resulting in discharge to the MS4 were reported during the reporting period.	No SSOs resulting in discharge to the MS4 are known to have occurred in the 5 years prior to the effective date of the permit. Maintain info and respond to future SSOs.	DPW, Land Use	Dec 2017	Reason for addition: Part of the IDDE Program.
3-8 Assess and Prepare Priority Ranking of Catchments	Not started		Classify each catchment within priority areas into an excluded, problem, high priority, or low priority catchment.	DPW, Land Use	Anticipate completing as funds are available.	The Town has been stalled on much of its IDDE work due to a lack of funding.
	Not started		Rank catchments within each category (except excluded catchments) based on screening factors found on page 6 & 7 in Appendix B of the General Permit.	DPW, Land Use	Anticipate completing initial classification and ranking as funds are available.	
3-9 Conduct Dry Weather Outfall Screening	Not started		Conduct dry weather screening and sampling (where flowing) of every MS4 outfall and interconnection (except for excluded and Problem Catchments).	DPW, Land Use	Anticipate completing as funds are available.	
3-10 Conduct Catchment Investigations and	Not started		Evaluate catchments for System Vulnerability Factors and begin catchment investigations.	DPW, Land Use	Anticipate completing as	

Remove Illicit Discharges	Not started		Where System Vulnerability Factors are present, conduct manhole inspections. Isolate and verify sources. Remove identified illicit discharges and conduct confirmatory outfall screening.	DPW	funds are available.	
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### 3.2 Describe any IDDE activities planned for the next year, if applicable.

- DPW is continuing to pursue funding to support IDDE activities; a funding request will be submitted to the new Board of Selectmen this spring.
- Maintain a master IDDE tracking spreadsheet and ensure all employees involved in IDDE program understand the logging process.
- Continue to implement the written IDDE Plan.
- Continue work to update MS4 outfall mapping and detailed mapping.

**3.3 Provide a record of all citizen reports of suspected illicit discharges and other illicit discharges occurring during the reporting period and SSOs occurring July 2017 through end of reporting period using the following table.** Illicit discharges are any unpermitted discharge to waters of the state that do not consist entirely of stormwater or uncontaminated groundwater except those discharges identified in Section 3(a)(2) of the MS4 general permit when such non-stormwater discharges are not significant contributors of pollution to a discharge from an identified MS4.

Location	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)
None reported.						

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

Method used to track illicit discharge reports	Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known	Dept. / Person responsible
None reported.				

### 3.5 Briefly describe the method and effectiveness of said method used to track illicit discharge reports.

Illicit discharge reports are tracked through the Citizen Action Line. Reports are stored in the cloud and sent to the Director of Public Works. DPW investigates any reports received and if illicit discharges are found, DPW works with Land Use, the Town Sanitarian, and Code Enforcement to eliminate the discharge. This method is effective for tracking illicit discharge.

## 3.6 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	243 total; 167 in priority area
Estimated or actual number of interconnections	17
Outfall mapping complete	90%
Interconnection mapping complete	90%
System-wide mapping complete (detailed MS4 infrastructure)	90%
Outfall assessment and priority ranking	0%
Dry weather screening of all High and Low priority outfalls complete	0
Catchment investigations complete	0
Estimated percentage of MS4 catchment area investigated	0%

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

Topic-specific trainings are provided annually. In 2024, training included:

- General IDDE training was not conducted in 2024. The training is anticipated to resume in 2025 and will cover what to look for when on patrol and checking waterways.

## 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	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 (Due 7/1/20)	In progress In progress	Regulations are currently being updated with coordination occurring internally between departments: portions of the codes that applied to applicable Boards were identified and shared for review.	Review and update, as necessary, existing land use regulations and policies for compliance with MS4 Permit construction site SW runoff control requirements. Amend existing Zoning Regulations to require submittal of waste mgmt plan for construction projects with land disturbance of 1-acre or more.	Planning, Legal	Anticipate ongoing progress. Started in 2019.	The Town contracted with a consultant to review existing land use regulations and has received recommendations for revisions.
4-2 Develop/ Implement plan for interdepartmental coordination in site plan review and approval (Ongoing)	Ongoing	Land Use and Inland Wetlands coordinated site plan review and approval.	Continue to implement existing interdepartmental coordination procedures.	Land Use Agencies and Departments	Ongoing	Town continues to evaluate recommendations from its consultant and move forward with the revision process in the coming year. Minimal construction occurs in the Town each year.

BMP	Status	Activities in current reporting period	Measurable Goal	Department/ Person Responsible	Date completed or projected completion date	Additional details
4-3 Review site plans for SW quality concerns (Ongoing)	Ongoing	26 site plans were reviewed and approved in 2024. Note that the current tracking system does not distinguish between projects greater or less than 1 acre.	Complete site plan reviews for all projects subject to the land use regulations.	Planning, Inland Wetlands Agency (IWA)	Ongoing	Inland wetlands personnel completed site plan reviews, as necessary, for projects subject to the land use regulations.
4-4 Conduct site inspections (Ongoing)	Ongoing		Conduct inspections and enforcement to assess/ensure the adequacy of installation, maintenance, operation, and repair of construction and post-construction control measures.	Planning	Ongoing	Inland wetlands personnel conducted site inspections as necessary.
4-5 Implement procedure to allow public comment on site development (Ongoing)	Ongoing		For projects not presented at public meeting, make list of building permits available at Town Hall that public can review/comment on.	Planning, Zoning Official	Ongoing	
	Complete		Post notices of Somers' "hotline" (Citizen Request Center) for SW-related comments on the municipal SW website.		Completed in early 2018.	
4-6 Implement procedure to notify developers about DEEP construction stormwater permit (Ongoing)	In Progress	The Town is in the process of drafting a handout.	Develop handout to provide to permit Applicants.	Planning	Anticipate completing when resources are available. Started in 2019.	
	Ongoing		Continue to inform developers/contractors of their potential obligation to register under the DEEP construction general permit and to provide a copy of the Storm Water Pollution Control Plan to Somers upon request.		Ongoing	Somers continues to inform developers/ contractors of their potential obligation to register under the DEEP construction general permit and to provide copies of the SWPPP upon request.

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

- Continue to review site plans and conduct construction site inspections.
- Continue to coordinate between Boards to review recommendations for updating existing land use regulations.
- Develop a handout to be given to developers/contractors when they apply for a permit notifying them of the requirements of the DEEP Construction SW General Permit.
- Continue the process of reviewing and revising existing regulations to incorporate recommended updates.



## 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	Date completed or projected completion date	Additional details
5-1 Establish/update legal authority and guidelines regarding LID and runoff reduction in site development planning (Due 7/1/22)	In progress	The Town contracted with consultant to review existing land use regulations and received recommendations for revisions. Departments internally coordinate portions of codes applying to applicable Boards identified and shared for review.	Review and update, as necessary, existing land use regulations and implementation policies for compliance with the General Permit post-construction SW management requirements.	Land Use, Public Works, Legal Counsel	Anticipate ongoing progress. Started 2018.	The Town continues to evaluate recommendations from its consultant to move forward with the revision process in the coming year.
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects (Due 7/1/22)	In progress		Review and update, as necessary, current regulations to require the use of and identify, reduce, or eliminate existing regulatory barriers to implementation of LID and runoff reduction practices.	Land Use, Public Works, Legal Counsel	Anticipate ongoing progress. Started 2018.	
	Ongoing	Plans are reviewed, as necessary, to ensure compliance with existing regulations.	Complete plan reviews and ensure compliance with land use regulations.	Planning, IWA	Ongoing	
5-3 Identify retention and detention ponds in priority areas (Due 7/1/20)	In Progress	Retention and detention basin locations have been reviewed and are currently believed to be up to date as shown. The Town will continue to update this data in field as needed.	Identify SW basins and treatment systems in priority areas and include them in GIS mapping.		Ongoing	A full-time employee was hired to assist with mapping efforts, although the position is currently vacant.
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures (Ongoing)	Complete	The only Town-owned treatment structures are detention basins.	Develop a long-term maint. plan for retention/ detention basins and SW treatment structures.	Planning, DPW	Completed by Dec. 2020.	
	In Progress	The Town's detention basins are inspected regularly and sediment is removed every 5 to 7 years, due to the low loading in the basins.	Implement maint. plan including annual inspection of retention/ detention basins and SW treatment structures and removal of accumulated sediment and pollutants.		Ongoing	
5-5 DCIA mapping (Due 7/1/20)	Complete		Calculate the Directly Connected Impervious Area (DCIA) of outfall catchment areas using guidance provided by DEEP and UConn CLEAR.	Planning, DPW	Nov 2018	
	Ongoing		Revise DCIA estimate as development, redevelopment, or retrofit projects effectively add or remove DCIA.		Ongoing	

BMP	Status	Activities in current reporting period	Measurable Goal	Department / Person Responsible	Date completed or projected completion date	Additional details
5-6 Address post-construction issues in areas with pollutants of concern	Not started		Address erosion and sediment problems noted during inspections conducted under Item 5-3 through retrofits.	Planning, Public Works	Anticipated to follow completion of 5-3 above.	

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

- Continue the process of reviewing and updating existing land use regulations to incorporate recommendations.
- Continue tracking and revising DCIA estimates to account for development and redevelopment projects.

## 5.3 Post-Construction Stormwater Management reporting metrics

For details on this requirement, visit <https://nemo.uconn.edu/ms4/tasks/post-construction.htm>. Scroll down to the DCIA section.

Metrics	
Baseline (2012) Directly Connected Impervious Area (DCIA)	268 acres
DCIA disconnected (redevelopment plus retrofits)	0 acres this year / 3.25 acres total
Retrofit projects completed	0
DCIA disconnected	0 % this year / 1.2 % total since 2012
Estimated cost of retrofits	\$0
Detention or retention ponds identified	0 this year / 0 total

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

DCIA estimated from high-res IC and LULC data from UConn NEMO and Sutherland Equations relating DCIA and Total Impervious Area (TIA)

# 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 or Person Responsible	Date completed or projected completion date	Additional details
6-1 Develop/ implement formal employee training program (Ongoing)	Ongoing	Multiple SW-related trainings were provided to staff.	Implement a training program for Town employees, building on the Town's current program.	Public Works	Ongoing	<ul style="list-style-type: none"> <li>• Salt spreader calibration training <ul style="list-style-type: none"> <li>○ November 25, 2024 – All staff (13)</li> </ul> </li> <li>• Snow and ice trainings on reducing salt use <ul style="list-style-type: none"> <li>○ November 25, 2024 – All staff</li> </ul> </li> <li>• Paint Care Program initial training <ul style="list-style-type: none"> <li>○ Dan Blinn – July 11, 2024</li> </ul> </li> </ul>

BMP	Status	Activities in current reporting period	Measurable Goal	Department or Person Responsible	Date completed or projected completion date	Additional details
						<ul style="list-style-type: none"> <li>Street sweeper operation training <ul style="list-style-type: none"> <li>David Mikulski &amp; Rich Locatelli – April 10, 2024</li> </ul> </li> </ul>
6-2 Implement MS4 property and operations maintenance (Ongoing)	Complete	Fertilizer use was reduced by 25% in 2018 and no herbicides were used.	Implement <b>turf/fertilizer management</b> BMPs for parks and open space.	Public Works, Board of Education	Dec 31, 2018	
	Complete	Five pet waste stations were installed in parks and public areas, along with seven signs encouraging pet owners to pick up pet wastes.	Implement <b>pet waste</b> management program in parks and public areas.	Public Works	Dec 31, 2018	
6-2 Implement MS4 Property and Operations Maintenance (Continued)	Complete	Coyote silhouettes were installed around Town parks to discourage waterfowl.	Implement <b>waterfowl management</b> BMPs in targeted areas (as applicable).	Public Works, Land Use	Dec 31, 2018	
	Not started	Progress this year was stalled due to a lack of funding.	Evaluate <b>municipal buildings and facilities</b> for spill prevention and pollution prevention practices and implement additional BMPs as necessary.	Public Works	Anticipate completing as funds are available.	SPCC Plans and SWPPPs for DPW facilities, parks, and Somersville Water Pollution Control Facility. Evaluations still needed at schools.
	Ongoing		Evaluate and modify, as necessary, municipal vehicle and equipment parking, fueling, washing, and maintenance practices.	Public Works	Anticipate completing as funds are available.	Vehicle maintenance is all done at the Public Works facility and Fire Station, which both have oil/water separators for wash water. Fueling practices will be evaluated.
	Ongoing	Residents self-haul leaves to the recycling center.	Implement leaf management procedures (Recycling Center drop-off).	Public Works	Ongoing	
6-3 Implement coordination with interconnected MS4s	Not started		Coordinate with neighboring municipalities, Department of Corrections, and CT DOT regarding MS4 program activities associated with interconnected MS4s.		Anticipate completing as funds are available.	The CT DOT has been identified as the only interconnected MS4. The Town has identified a contact person and will coordinate with the CT DOT.
6-4 Develop/implement program to control other sources of pollutants to the MS4	Ongoing		Identify unpermitted facilities. Control through IDDE program, water quality monitoring, the Town's ordinances related to illicit discharge, and targeted education and outreach to facilities that are not covered under a DEEP SW permit (see BMP 1-1).		Ongoing	No unpermitted facilities identified to date.

BMP	Status	Activities in current reporting period	Measurable Goal	Department or Person Responsible	Date completed or projected completion date	Additional details
6-5 Evaluate additional measures for discharges to impaired waters*	Complete/ Ongoing	"No Dumping" signs remain installed on Durkee Road, which is in the watershed of an impaired water body (Gillettes Brook).	Install and maintain "No Dumping" signs at stream or lake access points	Public Works	Ongoing	
6-6 Track projects that disconnect DCIA (Ongoing)	Ongoing	None during the reporting period. Total disconnection exceeds 1% for Year 4.	Annually track total acreage of DCIA that is disconnected as a result of redevelopment or retrofits.	Public Works, Planning	Ongoing	
6-7 Implement infrastructure repair/rehab program (Due 7/1/21)	Ongoing	Catch basin replacements were conducted as needed during the reporting period. 8 catch basins were repaired in 2024.	Repair, rehabilitate, or retrofit MS4 infrastructure (e.g., conveyances, structures, outfalls) as needed in a timely manner.	Public Works	Ongoing	
6-8 Develop/ implement plan to identify/prioritize retrofit projects (Due 7/1/20)	Not started		Develop retrofit plan and list of priority sites to reduce Directly Connected Impervious Area (DCIA)	Public Works, Land Use	Anticipate completing as funds are available.	Schools have been identified as high priority sites for potential retrofits.
6-9 Implement retrofit projects to disconnect 2% DCIA (Due 7/1/22)	Ongoing	The 1% disconnection goal for Year 4 has already been met.	Disconnect 1% per year beginning in Year 4		Anticipate completing by the deadline of July 1, 2022.	The Town has requested funding to design and implement a retrofit project at the schools, but has not yet received this allocation.
6-10 Develop/implement street sweeping program (Ongoing)	Ongoing	Approximately 180 lane miles of streets were swept from April 2024 to June 2024. Approximately 69 tons of debris was removed.	Sweep all municipally-owned or operated streets and parking lots each spring and fall.	Public Works	Ongoing	
6-10 Pavement Sweeping (Continued)	Ongoing	No new or redeveloped municipal parking lot projects occurred during the reporting period.	Evaluate runoff reduction measures such as permeable pavement or other measures to promote sheet flow of SW for all new and redeveloped municipal parking lots.	Public Works	Ongoing	
6-11 Develop/ implement catch basin cleaning program (Ongoing)	Complete		Develop a plan for optimizing catch basin cleaning (i.e., reduced frequency in certain areas) based on inspection findings, such that no catch basin is more than 50% full.		Apr 1, 2018	

BMP	Status	Activities in current reporting period	Measurable Goal	Department or Person Responsible	Date completed or projected completion date	Additional details
6-11 Develop/ implement catch basin cleaning program (Continued)	Ongoing	In 2023, all catch basins were inspected and cleaned.	Inspect and clean 100% of catch basins.	Public Works	Aug 2019	210 cubic yards of material was removed and disposed of
6-12 Develop/ implement snow management practices (Due 7/1/18)	Ongoing	Type and amount of deicing material was tracked, along with lane-miles treated, equipment used, and staff training information.	Implement practices for deicing material management and snow and ice control.	Public Works	Ongoing	

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

- Continue to document pertinent maintenance/cleaning operations.
- Maintain a list of complaints received regarding road and highway maintenance concerns.
- Continue to conduct employee training.
- Continue to inspect the maintenance garage monthly and maintain records of each inspection.
- Coordinate efforts with local schools.
- Continue to utilize digital work order system (FMX).
- Annually clean at least one third of catch basins.

### 6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	
Employee training provided for key staff	Yes, see BMP 6-1
Street sweeping	
Curb miles swept	180 lane miles
Volume (or mass) of material collected	69 tons
Catch basin cleaning	
Total catch basins in priority areas	1364
Total catch basins town- (or institution-) wide	1821
Catch basins inspected	12
Catch basins cleaned	0
Volume (or mass) of material removed from all catch basins	0 cubic yards – Catch Basins have low loading
Volume removed from catch basins to impaired waters (if known)	Unknown
Snow management	
Type(s) of deicing material used	Treated Road Salt
Total amount of each deicing material applied	1095.87 tons
Type(s) of deicing equipment used	Truck mounted combination dump/sander
Lane-miles treated (A lane-mile is a mile of roadway in a single driving lane)	180 miles
Snow disposal location	Snow is left on site
Staff training provided on application methods & equipment	All staff is Green Snow Pro trained
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	24 %
Reduction in turf area (since start of permit)	4 acres – The High School field artificial turf
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	\$150.00 pet waste bags

### 6.4 Catch basin cleaning program

**Provide any updates or modifications to your catch basin cleaning program.**

Town cleaned all 1,821 catch basins in 2024. During cleaning, outside vendor performs cleaning while DPW staff member inspects basin, logs condition of basin, whether repairs are needed, and estimates of amount of material removed during cleaning. Town maintains list of basins requiring more frequent future cleaning and basins that need less frequent cleaning. Information used to inform optimal future schedule for catch basin inspection and cleaning.

### 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. (Due 7/1/20)**

The Town has identified schools as likely sites for retrofits, pursuing funding to further evaluate possibility of retrofits at school complex. Town applied for but did not receive ARPA (American Rescue Plan) funding in 2021.

**Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection annually in future years. (Due 7/1/22)**

The Town will continue to seek out funding for evaluating the school complex as a potential site for retrofits.

## Part II: Impaired waters investigation and monitoring

### 1. Impaired waters investigation and monitoring program

For details on this requirement, visit <https://nemo.uconn.edu/ms4/tasks/monitoring.htm>. Refer to the yellow column of the Monitoring comparison chart and the Impaired waters monitoring flowchart.

**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.

Two outfalls to the Town's impaired waters were screened for bacteria under the 2004 permit; those data were included in a previous report. One of the two outfalls had high levels of E. coli and will require follow-up screening. No additional screening of outfalls to impaired waterbodies has been conducted to date under the 2017 permit due to funding availability. All waterbodies in the state are subject to the Northeast Regional Mercury TMDL, however no specific monitoring or sampling is required in association with this TMDL.

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

#### 2.1 Screening data

Complete the table below to report data for any wet weather sampling completed for MS4 outfalls that discharge directly to a stormwater impaired waterbody during the reporting period. For details on this requirement, visit [www.nemo.uconn.edu/ms4/tasks/monitoring.htm](http://www.nemo.uconn.edu/ms4/tasks/monitoring.htm). Refer to the yellow column of the Monitoring comparison chart and the Impaired waters monitoring flowchart.

Each Annual Report will add on to the previous year's data showing a cumulative list of sampling data. **You may also attach an excel spreadsheet with the same data rather than copying it into this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Outfall ID	Latitude / Longitude	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required? *
Not Yet Started						

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 ID	Status of drainage area investigation	Control measure to address impairment
Not yet started.		

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

Once outfall sampling 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, 2021. **You may also attach an excel spreadsheet with the same data rather than copying it to this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Outfall	Latitude / Longitude	Sample Date	Parameter(s)	Results	Name of Laboratory (if used)
Not yet started.					



## 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
Not yet completed.		

### 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

This screening is the baseline IDDE dry weather screening. For details on this requirement, visit <https://nemo.uconn.edu/ms4/tasks/monitoring.htm>. Refer to the blue column of the Monitoring comparison chart and the IDDE baseline monitoring flowchart.

Provide sample data for outfalls where flow is observed, during dry weather, of outfalls and interconnections categorized as high or low priority in priority areas. Do not include problem or excluded catchments. Only include Pollutant of concern data for outfalls that discharge into stormwater impaired waterbodies. **You may also attach an excel spreadsheet with the same data rather than copying it to this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Outfall / Interconnection ID	Latitude/ Longitude	Screening / sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or enterococcus	Surfactants	Water Temp	Pollutant of concern	If required, follow- up actions taken
Not yet started.											

#### 2.2 Wet weather sample and inspection data

This sampling data is the baseline wet weather priority catchment investigation sampling. For details on this requirement, visit <https://nemo.uconn.edu/ms4/tasks/monitoring.htm>. Refer to the green column of the Monitoring comparison chart and the IDDE catchment investigation flowchart.

Provide baseline sample data for outfalls and key junction manholes of any catchment area (all high priority, low priority, and problem outfalls within the priority area) with at least one System Vulnerability Factor. **You may also attach an excel spreadsheet with the same data rather than copying it to this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Outfall / Interconnection ID	Latitude / Longitude	Sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or Enterococcus	Surfactants	Water Temp	Pollutant of concern
Not yet started.										

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

For details on this requirement, visit [www.nemo.uconn.edu/ms4/tasks/monitoring.htm](http://www.nemo.uconn.edu/ms4/tasks/monitoring.htm). Refer to the green column of the Monitoring comparison chart and the IDDE catchment investigation flowchart.

#### 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
Not yet started.		

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

This screening is the dry weather priority catchment investigation screening. Provide sample data, both baseline and follow-up, for key junction manholes of any catchment area begin investigated for an illicit discharge and do not have any SVFs present. Follow-up investigations must take place within one year and again within five years. **You may also attach an excel spreadsheet with the same data rather than copying it to this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Key Junction Manhole ID	Latitude / Longitude	Screening / Sample date	Visual/ olfactory evidence of illicit discharge	Ammonia	Chlorine	Surfactants
Not yet started.						

### 3.3 Wet weather follow-up investigation outfall sampling data

This sampling is the follow-up investigations for the wet weather priority catchment investigation. Provide follow-up sample data for outfalls and key junction manholes of any catchment area with at least one System Vulnerability Factor. Follow-up investigations must take place within one year and again within five years. **You may also attach an excel spreadsheet with the same data rather than copying it to this table.** If you do attach a spreadsheet, please write "See Attachment" below.

Outfall ID	Latitude / Longitude	Sample date	Ammonia	Chlorine	Surfactants
Not yet started.					

### 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
N/A							

**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."

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