

TOWN OF BROOKLYN



CONNECTICUT

MS4

STORMWATER MANAGEMENT PLAN

September 2021

## Contents

|  |           |
|--|-----------|
| <b>INTRODUCTION.....</b>   | <b>3</b>  |
| <b>(1) PUBLIC EDUCATION AND OUTREACH .....</b>   | <b>5</b>  |
| 1.1 IMPLEMENT PUBLIC EDUCATION PROGRAM.....  | 5         |
| 1.2 ADDRESS EDUCATION AND OUTREACH FOR POLLUTANTS OF CONCERN   | 6         |
| <b>(2) PUBLIC INVOLVEMENT AND PARTICIPATION .....</b>  | <b>7</b>  |
| 2.1 COMPLY WITH PUBLIC NOTICE REQUIREMENTS FOR THE STORMWATER MANAGEMENT PLAN AND ANNUAL REPORTS       | 7         |
| <b>(3) ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>   | <b>8</b>  |
| 3.1 DEVELOP WRITTEN IDDE PLAN .....  | 8         |
| 3.2 DEVELOP LIST AND MAP OF ALL MS4 OUTFALLS AND INTERCONNECTIONS IN PRIORITY AREAS                    | 8         |
| 3.3 DEVELOP CITIZEN REPORTING PROGRAM .....  | 8         |
| 3.4 ESTABLISH LEGAL AUTHORITY TO PROHIBIT ILLICIT DISCHARGES   | 9         |
| 3.5 DEVELOP RECORD KEEPING SYSTEM FOR IDDE TRACKING ....   | 9         |
| 3.6 ADDRESS IDDE IN AREAS WITH POLLUTANTS OF CONCERN....   | 9         |
| 3.7 DETAILED MS4 INFRASTRUCTURE MAPPING.....   | 9         |
| <b>(4) CONSTRUCTION SITE STORMWATER RUNOFF CONTROL</b>   | <b>11</b> |
| 4.1 IMPLEMENT, UPGRADE AND ENFORCE LAND USE REGULATIONS TO MEET REQUIREMENTS OF MS4 GENERAL PERMIT     | 11        |
| 4.2 DEVELOP AND IMPLEMENT PLAN FOR INTERDEPARTMENTAL COORDINATION OF SITE PLAN REVIEW AND APPROVAL     | 11        |
| 4.3 REVIEW SITE PLANS FOR STORMWATER QUALITY CONCERNS  | 12        |
| 4.4 CONDUCT SITE INSPECTIONS .....   | 12        |
| 4.5 IMPLEMENT PROCEDURE TO ALLOW PUBLIC COMMENT ON SITE DEVELOPMENT                                    | 12        |
| 4.6 IMPLEMENT PROCEDURE TO NOTIFY DEVELOPERS ABOUT DEEP CONSTRUCTION STORMWATER PERMIT                 | 12        |
| <b>(5) POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT OR REDEVELOPMENT</b>                 | <b>14</b> |
| 5.1 ESTABLISH LEGAL AUTHORITY AND GUIDELINES FOR LID AND RUNOFF REDUCTION IN SITE DEVELOPMENT PLANNING | 14        |
| 5.2 IMPLEMENT LONG-TERM MAINTENANCE PLAN FOR STORMWATER BASINS AND TREATMENT STRUCTURES                | 15        |
| 5.3 DIRECTLY CONNECTED IMPERVIOUS AREA (DCIA) MAPPING  | 15        |
| 5.4 ADDRESS POST-CONSTRUCTION ISSUES IN AREAS WITH POLLUTANTS OF CONCERN                               | 15        |
| <b>(6) POLLUTION PREVENTION / GOOD HOUSEKEEPING</b>  | <b>17</b> |
| 6.1 DEVELOP AND IMPLEMENT FORMAL EMPLOYEE TRAINING PROGRAM   | 17        |
| 6.2 IMPLEMENT MS4 PROPERTY AND OPERATIONS MAINTENANCE  | 17        |
| 6.3 IMPLEMENT COORDINATION WITH INTERCONNECTED MS4s.   | 19        |
| 6.4 DEVELOP AND IMPLEMENT A PROGRAM TO CONTROL OTHER SOURCES OF POLLUTANTS TO THE MS4                  | 19        |
| 6.5 EVALUATE ADDITIONAL MEASURES FOR DISCHARGES TO IMPAIRED WATERS                                     | 19        |
| 6.6 TRACK PROJECTS THAT DISCONNECT DCIA .....  | 20        |
| 6.7 DEVELOP AND IMPLEMENT AN INFRASTRUCTURE REPAIR, REHABILITATION AND RETROFIT PROGRAM                | 20        |
| 6.8 DEVELOP AND IMPLEMENT PLAN TO IDENTIFY AND PRIORITIZE RETROFIT PROJECTS                            | 20        |
| 6.9 DEVELOP AND IMPLEMENT STREET SWEEPING PROGRAM.....   | 20        |
| 6.10 DEVELOP AND IMPLEMENT CATCH BASIN CLEANING PROGRAM  | 21        |
| 6.11 DEVELOP AND IMPLEMENT SNOW MANAGEMENT PRACTICES   | 22        |
| <b>STORMWATER MANAGEMENT PLAN SIGNATURE .....</b>  | <b>24</b> |
| <b>STORMWATER MANAGEMENT PLAN ENGINEERING CERTIFICATION</b>  | <b>24</b> |

## Introduction

This Stormwater Management Plan (SMP) was developed by the Town of Brooklyn to protect water quality and reduce the discharge of pollutants from the municipality's storm sewer system to the maximum extent practicable (MEP). This SMP addresses the requirements established by the CT Department of Energy and Environmental Protection's (DEEP) General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4 General Permit). This permit is the local enforcement mechanism of the U.S. Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) Stormwater Phase II Rule.

### SMP Structure

The plan outlines a program of best management practices (BMPs), measurable goals, responsible individuals or departments, and implementation schedules for the following six minimum control measures:

- (1) Public education and outreach
- (2) Public involvement and participation
- (3) Illicit discharge detection and elimination
- (4) Construction site stormwater runoff control
- (5) Post-construction stormwater management in new development and redevelopment
- (6) Pollution prevention/good housekeeping

### Area Subject to the Plan

The measures identified in this SMP will be applied throughout the boundaries of the Town of Brooklyn except as otherwise noted and be consistent with the MS4 General Permit requirements. Stormwater discharge from municipally-owned maintenance garages, salt sheds and other facilities subject to the DEEP Industrial Stormwater General Permit will continue to be regulated under the conditions of that permit.

### SMP Development

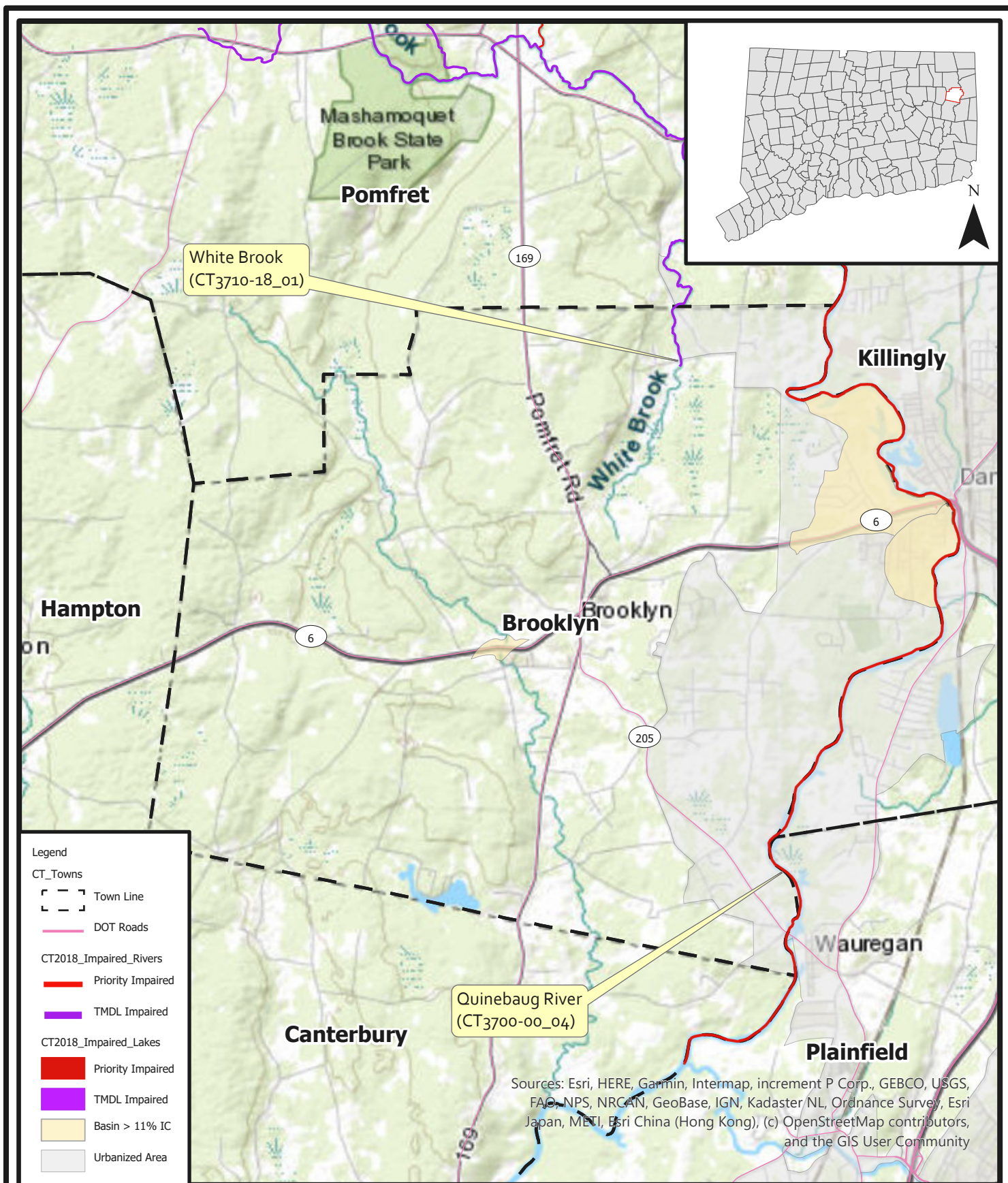
A stormwater committee led by the First Selectman and including representatives from Land Use Department and Highway Department was assembled to coordinate the development and implementation of the SMP. The SMP's implementation will be tracked and documented in Annual Reports summarizing stormwater management activities carried out by the town and its partners. These reports will be submitted to DEEP on an annual basis no later than April 1.

### Description of Municipality

The operator of the MS4 is the Town of Brooklyn. The Town of Brooklyn is a public entity located in the county of Windham, State of Connecticut. The Town of Brooklyn covers an area of approximately 29.1 square miles, located in Northeastern Connecticut as shown in Figure 1. The Connecticut Department of Transportation (DOT) operates an MS4 on state highways located in the Town of Brooklyn. This system is regulated under the CT DOT's MS4 permit. Implementation of the BMPs identified in this plan will be coordinated between Brooklyn and CT DOT.

### Impaired Waters

In preparing the SMP, the CT DEEP's Water Quality Standards were reviewed in order to determine the Surface Water Quality Classifications for each watercourse in town. Certain BMP's address the watersheds containing watercourses designated as "impaired" by the CT DEEP. Table 1 shows the water quality classification for each watershed. Table 2 summarizes the water bodies within or that run through the municipality that are listed on the 2020 List of Connecticut Water Bodies not meeting water quality standards and are designated as "impaired".



| <b>TABLE 1</b><br><b>Water Quality Surface</b><br><b>Classifications Brooklyn, CT</b> |                   |                                      |                                      |
|---|-------------------|--------------------------------------|--------------------------------------|
| Drainage Basin Number   | Name              | Surface Water Quality Classification | Impaired per Water Quality Standards |
| 3700  | Quinebaug River   | B                                    | Yes                                  |
| 3710  | Mashamoquet Brook | A                                    | Yes                                  |
| 3711  | Blackwell Brook   | A                                    | No                                   |
| 3711-10   | Cold Spring Brook | A                                    | No                                   |

| <b>TABLE 2</b><br><b>Impaired Waterbody</b>                         |                                       |                              |              |                  |                        |
|---|---------------------------------------|------------------------------|--------------|------------------|------------------------|
| Waterbody ID  | Water Segment Description             | Water Segment Length (miles) | Impaired Use | Pollutant        | Cause/Potential Source |
| <b>Mashamoquet Brook – Surface Water Quality Classification – A</b> |                                       |                              |              |                  |                        |
| White Brook   | Mashamoquet Brook to Quinebaug River  | 3.07                         | Recreation   | Escherichia Coli | Unknown                |
| <b>Quinebaug River – Surface Water Quality Classification – B</b>   |                                       |                              |              |                  |                        |
| Quinebaug River   | Kennedy Drive, Putnam to Moosup River | 17.61                        | Aquatic Life | Unknown          | Unknown                |

The surface water classifications currently assigned to Brooklyn watercourses are defined below.

#### Class A

Surface water is known or presumed to meet Water Quality Criteria which support designated uses, which may include potential drinking water supply; fish and wildlife habitat; recreational use; agricultural, industrial supply and other legitimate uses, including navigation.

#### Class B

Designated uses are habitat for fish and aquatic life and wildlife; recreation; navigation; and industrial and agricultural water supply.

Based on the DEEP Surface Water Quality Classifications, Quinebaug River is identified as the surface water that should take the highest priority in Brooklyn's efforts to address stormwater impacts. This was taken into consideration as the BMPs were developed.

## (1) Public Education and Outreach

This minimum control measure outlines a program to communicate common sources of stormwater pollution and the impacts of polluted stormwater to the public. This will be done through distributing educational materials to the community and conducting outreach activities. The following BMPs and implementation schedule serve as Brooklyn's MS4 Public Education Program.

### **Goals:**

- Raise public awareness that polluted stormwater runoff is the most significant source of water quality problems;
- Motivate residents to use Best Management Practices (BMPs) that reduce polluted stormwater runoff; and
- Reduce polluted stormwater runoff in town as a result of increased awareness and utilization of BMPs.

### 1.1 Implement public education program

Brooklyn will collect and make available stormwater educational materials that, at a minimum, address the impacts of the following on water quality: pet waste, impervious cover, application of fertilizers, pesticides, and herbicides, and illicit discharges and improper disposal of wastes into the MS4.

Brooklyn will maintain their own or link to UConn NEMO's comprehensive online library of stormwater educational material. The Brooklyn website, [www.ctBrooklyn.org](http://www.ctBrooklyn.org), will link directly to this web-based library and promote the availability of these materials: the planning department will include certain outreach material to site plan review checklist. Brooklyn will also provide materials in a printed format to be on display in public locations within the town hall and a public library.

Additional targeted outreach efforts will be completed by Brooklyn to educate K-12 students, agricultural operators, commercial businesses, developers, and homeowners on particular aspects of stormwater management.

Brooklyn will ensure that all required topics listed in this plan are covered and tracked on an annual basis.

## 1.2 Address education and outreach for pollutants of concern

Brooklyn will distribute information on common sources of phosphorus, nitrogen, bacteria, PCB and mercury pollution and how to prevent or reduce the amount reaching the MS4 and discharging into waterways.

The table below shows additional topics to be covered to address the phosphorus, nitrogen, bacteria, PCB and mercury impairments that exist in Brooklyn.

| <b>Phosphorus</b>   | <b>Nitrogen</b>   | <b>Bacteria</b>                                   | <b>Mercury</b>        | <b>PCB</b>                 |
|---|---|---|-----------------------|----------------------------|
| Septic systems  | Septic systems  | Septic systems                                    | Thermometers          | Fluorescent light Ballasts |
| Fertilizer use  | Fertilizer use  | Sanitary cross connections                        | Thermostats           | Electrical Equipment       |
| Grass clippings and leaves management                                     | Grass clippings and leaves management                                   | Waterfowl   | Fluorescent lights    | Hydraulic Fluids           |
| Detergent use   | Discharge of sediment (to which Nitrogen binds) from Construction sites | Pet waste   | Button cell batteries | Lubricants                 |
| Discharge of sediment (to which Phosphorus binds) from Construction sites | Other erosive surfaces  | Manure piles associated with livestock and horses |                       | Plasticizers               |

### Public outreach and education schedule

| <b>BMP</b>   | <b>Lead department / individual</b> | <b>Month / year of implementation</b>            | <b>Measurable goal</b>  |
|--|-------------------------------------|--|---|
| Implement public education program                   | First Selectman                     | August 1, 2020 and continue until permit expires | Post Appropriate Materials on Website                         |
| Address education/outreach for pollutants of concern | First Selectman                     | August 1, 2020 and continue until permit expires | Post Appropriate Materials on Website. 1 mailer with tax bill |

## (2) Public Involvement and Participation

This minimum control measure identifies the process for public involvement and participation in the town's stormwater management efforts.

### **Goals:**

- Involve the community in planning and implementing the town's stormwater management activities.
- Provide a minimum 30 day notice to the public for this plan and annual reports.

### 2.1 Comply with public notice requirements for the Stormwater Management Plan and Annual Reports

Brooklyn will publish a public notice on its website [www.Brooklynct.org](http://www.Brooklynct.org), through an email and in a newspaper. The notice will provide a contact name, phone number, address, and email to whom the public can send comments. Additionally, this plan and the Annual Reports will be publicly accessible on the web [www.Brooklynct.org](http://www.Brooklynct.org) and in Brooklyn town hall. The public notice will allow for a 60-day comment period, at a minimum.

Public involvement and participation schedule

| <b>BMP</b>  | <b>Lead department / individual</b> | <b>Month / year of implementation</b>         | <b>Measurable goal</b>   |
|---|-------------------------------------|---|--------------------------|
| Comply with public notice requirements for the SMP and Annual Reports | First Selectman                     | August 2020 and continue until permit expires | Maintain file of notices |



### (3) Illicit Discharge Detection and Elimination

This minimum control measure outlines a program to detect and eliminate current illicit discharges to the MS4 and prevent further illicit discharges in the future. All activities for this measure will be completed in Brooklyn's priority areas (urbanized area, catchment areas with directly connected impervious area (DCIA) > 11%, and outfalls that discharge to impaired waters).

**Goal:**

Find the source of any illicit discharges; eliminate those illicit discharges; and ensure ongoing screening and tracking to prevent and eliminate future illicit discharges.

#### 3.1 Develop written IDDE plan

Brooklyn will develop a written IDDE plan to detect, locate and eliminate illicit discharges (to the maximum extent practicable) from the MS4 within Brooklyn's priority areas. The IDDE plan will provide enforceable legal authority to eliminate illicit discharges, assign responsibilities, and develop a citizen reporting program. The plan will also outline the outfall screening and IDDE protocols consistent with Appendix B of the MS4 General Permit to identify, prioritize, and investigate MS4 catchments for suspected illicit discharge of pollutants. Also, the IDDE plan will outline follow-up screening and illicit discharge prevention procedures.

#### 3.2 Develop list and map of all MS4 outfalls and interconnections in priority areas

Brooklyn will develop a database of all stormwater discharges from a pipe or conduit located within and owned or operated by the municipality and all interconnections with other MS4s. Each entry will include:

- a. Type, material, size, shape and location (identified with a latitude and longitude) of conveyance, outfall or channelized flow (e.g. 24" concrete pipe);
- b. the name, water body ID and Surface Water Quality Classification of the immediate surface waterbody or wetland to which the stormwater runoff discharges;
- c. if the outfall does not discharge directly to a named waterbody, the name and water body ID of the nearest named waterbody to which the outfall eventually discharges;
- d. the name of the watershed, including the subregional drainage basin number (available from CT ECO at [www.cteco.uconn.edu](http://www.cteco.uconn.edu)) in which the discharge is located;
- e. date of most recent inspection of the outfall, the condition, and any indicators of potential non-stormwater discharges as of most recent inspection;

The database will be exported into excel format for annual reports. CLA Engineers, Inc. to maintain GIS database.

#### 3.3 Develop citizen reporting program

Brooklyn will establish a system to allow for citizen reporting of suspected illicit discharges into the stormwater system. The system will include an email address and/or phone number for submitting a report. Brooklyn will affirmatively investigate and eliminate any illicit discharges for which a time and location of discharge are provided. Brooklyn will promptly inspect the reported outfall or manhole and proceed according to the

requirements of the written IDDE program. All citizen reports and responses will be included in Brooklyn's annual report.

### 3.4 Establish legal authority to prohibit illicit discharges

Brooklyn will establish the necessary and enforceable legal authority by statute, ordinance, rules and regulations, permit, easement, contract, order or any other means, to eliminate illicit discharges. The authority will:

- a. prohibit illicit discharges to its storm sewer system and require removal of such discharges consistent with the deadlines outlined in the MS4 general; and
- b. authorize the investigation of suspected illicit discharges and elimination of illicit discharge, including from properties not owned or controlled by the MS4 that discharge to the MS4
- c. control the discharge of spills and prohibit the dumping or disposal of materials including, but not limited to, residential, industrial and commercial wastes, trash, used motor vehicle fluids, pesticides, fertilizers, food preparation waste, leaf litter, grass clippings, and animal wastes into its MS4; and
- d. authorize appropriate enforcement procedures and actions;
- e. authorize fines or penalties and/or recoup costs incurred by the permittee from anyone creating an illicit discharge or spilling or dumping.

### 3.5 Develop record keeping system for IDDE Tracking

Brooklyn 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.

In addition, Brooklyn will develop and maintain an SSO inventory that records the location, date and time of occurrence, estimated volume of discharge, a description of known or suspected cause, and details about mitigating measures including dates of implementation.

This inventory will also:

- include all known SSOs to their MS4 in the past 5 years;
- continue to be updated to track future SSOs; and
- be included in Annual Reports.

### 3.6 Address IDDE in areas with pollutants of concern

Brooklyn will identify which areas in town are most likely to contribute nitrogen, phosphorus, and bacteria to the MS4. This assessment will consider: historic on-site sanitary system failures, proximity to bacterial impaired waters, low infiltrative soils, and shallow groundwater. Any areas determined to have a high potential for septic system failure will be reported to the Northeast District Department of Health for corrective action.

### 3.7 Detailed MS4 infrastructure mapping

Brooklyn will develop a detailed map of the MS4 to include:

- Components of the MS4 within priority areas:

- Outfalls & receiving waters;
- Pipes; open channel conveyances; catch basins; manholes;
- Interconnections with other MS4s and other storm sewer systems;
- Municipally-owned stormwater treatment structures (e.g. detention & retention ponds, infiltration systems, bioretention areas, water quality swales, gross particle separators, oil/water separators, or other systems);
- Catchment delineations for each outfall;
- Impaired water bodies identified by name and use impairment as defined by the most recent integrated water quality report;
- Municipal sanitary sewer system (if available);
- Municipal combined sewer system (if applicable).

Brooklyn will update the map as new information becomes available and will report on the progress of the development of this map in the annual report.

### Illicit discharge detection and elimination schedule

| <b>BMP</b>  | <b>Lead department / individual</b> | <b>Month / year of implementation</b> | <b>Measurable goal</b>    |
|---|-------------------------------------|---------------------------------------|---------------------------|
| Develop written IDDE program  | First Selectman                     | August 1, 2020                        | Bylaw/regulation in place |
| Develop list and maps of all MS4 stormwater outfalls in priority areas        | DPW Director                        | September, 2020                       | GIS database              |
| Develop citizen reporting program   | Wetland Agent                       | August, 2020                          | Web link                  |
| Establish legal authority to prohibit illicit discharges                      | Planning and Zoning                 | December 1, 2020                      | Bylaw/regulation in place |
| Develop record keeping system for IDDE tracking                               | DPW Director                        | September 1, 2020                     | GIS database              |
| Address IDDE in areas with pollutants of concern                              | DPW Director                        | September 1, 2020                     | GIS database              |
| Detailed MS4 infrastructure mapping   | DPW Director                        | September 1, 2020                     | GIS database              |
| Complete list and maps of all MS4 stormwater outfalls throughout municipality | DPW Director                        | September, 2020                       | GIS database              |

## (4) Construction Site Stormwater Runoff Control

This minimum control measure outlines procedures for minimizing polluted stormwater runoff from activities that disturb one or more acres of land. In Brooklyn, this is determined on a site by site basis OR collectively as part of a larger plan.

**Goal:**

Minimize polluted stormwater runoff from construction sites and prevent it from carrying sediment into waterways via MS4 infrastructure.

### 4.1 Implement, upgrade and enforce land use regulations to meet requirements of MS4 general permit

Brooklyn will revise its land use regulations to establish the legal authority to control stormwater runoff from construction sites by requiring:

- a. developers, construction site operators, or contractors maintain consistency with the 2002 Guidelines for Soil Erosion and Sedimentation Control, as amended, the Connecticut Stormwater Quality Manual, and all stormwater discharge permits issued by the DEEP within the municipal or institutional boundary pursuant to CGS 22a-430 and 22a-430b;
- b. the implementation of additional measures to protect/improve water quality (in addition to the above requirements) as deemed necessary by Brooklyn;
- c. Brooklyn is authorized to carry out all inspection, surveillance and monitoring procedures necessary to determine compliance with municipal regulations, ordinances or programs or institutional requirements related to the management of Brooklyn's MS4. Inspections shall be conducted, where allowed, to inventory the number of privately-owned retention ponds, detention ponds and other stormwater basins that discharge to or receive drainage from the permittee's MS4;
- d. the owner of a site seeking development approval from Brooklyn shall provide and comply with a long term maintenance plan and schedule to ensure the performance and pollutant removal efficiency of privately-owned retention ponds, detention ponds and other stormwater basins that discharge to or receive discharge from Brooklyn's MS4 including short-term and long-term inspection and maintenance measures to be implemented by the private owner; and
- e. Brooklyn will control, through interagency or inter-jurisdictional agreements, the contribution of pollutants between the permittee's MS4 and MS4s owned or operated by others.

### 4.2 Develop and implement plan for interdepartmental coordination of site plan review and approval

Brooklyn's plan to coordinate the functions of all the departments and boards involved in the review, permitting, or approval of land disturbance projects is as follows:

Checklist for each department shall be developed and included with every application.

### 4.3 Review site plans for stormwater quality concerns

Brooklyn will conduct site plan reviews that incorporate consideration of stormwater controls or management practices to prevent or minimize impacts to water quality on sites with soil disturbance of one acre or more. Brooklyn will also conduct site inspections to assess the adequacy of the installation, maintenance, operation, and repair of construction and post construction control measures and take enforcement action when necessary.

### 4.4 Conduct site inspections

Brooklyn will perform construction site inspections and take enforcement actions if necessary to ensure the adequacy of the installation, maintenance, operation, and repair of all construction and post-construction runoff control measures.

### 4.5 Implement procedure to allow public comment on site development

Brooklyn's procedure for public involvement in proposed and ongoing development and land disturbance activities is as follows:

Information submitted by the public is forwarded to the Public Works Department within the Town for consideration. Information related to construction site runoff is forwarded to the Zoning Enforcement Officer and Director of Public Works.

### 4.6 Implement procedure to notify developers about DEEP construction stormwater permit

Brooklyn will notify developers and contractors of their potential obligation to obtain authorization under DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (construction general permit) if their project disturbs more than 1 acre of land and results in a point source discharge to Connecticut surface waters directly or through the Brooklyn MS4. Brooklyn will also require a copy of the Storm Water Pollution Control Plan be made available to the town on request. The procedure to notify developers of the construction general permit is as follows:

Brooklyn will inform developers (working with the municipality) that they have a potential obligation to obtain authorization under the DEEP's General Permit for the discharge of stormwater and dewatering wastewaters associated with construction activities ("Construction General Permit") if their development or redevelopment project disturbs one or more acres of land, either individually or collectively, as part of larger common plan, and results in a point source discharge to the surface waters or the State directly or through the permittee's MS4. The notification shall include a provision informing the developer/contractor of their obligation to provide a copy of the Storm Water Pollution Prevention Plan (required by the construction general permit) to the permittee upon request.

The contractor is required at all times to conduct his operations in conformity with all Federal and State permit requirements concerning water, air, noise pollution and the disposal of contaminated, or hazardous materials.

## Construction site stormwater management schedule

| <b>BMP</b>   | <b>Lead department / individual</b> | <b>Month / year of implementation</b> | <b>Measurable goal</b>                         |
|--|-------------------------------------|---------------------------------------|--|
| Implement, upgrade and enforce land use regs to meeting MS4 permit requirements            | Zoning Enforcement                  | July 1, 2019                          | Modify regulations                             |
| Develop/implement plan for interdepartmental coordination in site plan review and approval | First Selectman                     | July 1, 2017                          | Develop and implement a departmental checklist |
| Review site plans for stormwater quality concerns  | Planning and Zoning                 | July 1, 2017                          | File copies of reviews                         |
| Conduct site inspections   | Zoning Enforcement                  | July 1, 2017                          | File copies of inspection reports              |
| Implement procedure to allow public comment on site development                            | Planning and Zoning                 | July 1, 2017                          | Web link                                       |
| Implement procedure to notify developers about DEEP construction stormwater permit         | Planning and Zoning                 | July 1, 2017                          | Develop/modify site plan checklist             |

## (5) Post-construction Stormwater Management in New Development or Redevelopment

This minimum control measure outlines Brooklyn's program to address stormwater runoff from new or re-development projects that disturb one or more acres of land.

### **Goal:**

Mitigate the long-term impacts of new and re-development projects on water quality through proper use of low impact development and runoff reduction practices.

### 5.1 Establish legal authority and guidelines for LID and runoff reduction in site development planning

Brooklyn will establish the legal authority by ordinance, bylaw, regulation, standard condition of approval, or other means to require, to the MEP, developers and contractors seeking the town's approval to consider the use of low impact development (LID) and runoff reduction site planning and development practices that meet or exceed those LID and runoff reduction practices in the CT Stormwater Quality Manual prior to other stormwater management practices allowed in Brooklyn's land use regulations, guidance or construction project requirements.

This legal authority will include the following standards:

- 1) for redevelopment of sites that are currently developed with Directly Connected Impervious Area (DCIA) of forty percent or more, the project must retain on-site half the water quality volume for the site, or
- 2) for new development and redevelopment of sites with less than forty percent DCIA, retain the water quality volume for the site, or
- 3) if those retention standards cannot be met, the developer will be required to provide a report indicating why the standard could not be met and a mitigation project on another property or pay a fee to fund a DCIA retrofit.

In developing this legal authority, Brooklyn will consider the following watershed protection elements to manage the impacts of stormwater on receiving waters:

- a. Minimize the amount of impervious surfaces (roads, parking lots, roofs, etc.) within each municipality by minimizing the creation, extension, and widening of parking lots, roads, and associated development and encourage the use of Low Impact Development or green infrastructure practices.
- b. Preserve, protect, create and restore ecologically sensitive areas that provide water quality benefits and serve critical watershed functions. These areas may include, but are not limited to; riparian corridors, headwaters, floodplains and wetlands.
- c. Implement stormwater management practices that prevent or reduce thermal impacts to streams, including requiring vegetated buffers along waterways, and disconnecting discharges to surface waters from impervious surfaces such as parking lots.
- d. Seek to avoid or prevent hydromodification of streams and other water bodies caused by development, including roads, highways, and bridges.
- e. Implement standards to protect trees, and other vegetation with important evapotranspirative qualities.

- f. Implement policies to protect native soils, prevent topsoil stripping, and prevent compaction of soils.
- g. Coordinate with state or local health officials to ensure no interference with performance of on-site septic systems.
- h. Limit turf areas.

In addition, Brooklyn will review its current regulations - site planning requirements, zoning regulations, street design regulations, and infrastructure specifications with minimum size criteria for impervious cover (roads, parking lots, etc.) to identify and, where appropriate, reduce or eliminate existing regulatory barriers to implementation of LID and runoff reduction practices to the MEP.

## 5.2 Implement long-term maintenance plan for stormwater basins and treatment structures

Brooklyn will develop a maintenance plan for retention / detention ponds and stormwater treatment structures that it owns or over which it holds an easement or other authority and that are located in the town's priority areas to ensure their long-term effectiveness. This plan will require an annual inspection of those retention / detention ponds and stormwater treatment structures and removal of accumulated sediment and pollutants in excess of 50% design capacity.

## 5.3 Directly Connected Impervious Area (DCIA) mapping

Brooklyn will follow guidance provided by DEEP and UConn CLEAR to calculate the Directly Connected Impervious Area (DCIA) that contributes stormwater runoff to each of its MS4 outfalls. Progress on this task will be documented in each Annual Report until completion.

## 5.4 Address post-construction issues in areas with pollutants of concern

For areas contributing to waters where **Nitrogen, Phosphorus** or **Bacteria** is a Stormwater Pollutant of Concern and erosion or sedimentation problems are found during the annual inspections conducted under the long-term maintenance plan described in BMP 5.2, Brooklyn will prioritize those areas for the DCIA retrofit program under minimum control measure 6 – Pollution Prevention/Good Housekeeping.



## Post-construction stormwater management schedule

| <b>BMP</b>   | <b>Lead department / individual</b> | <b>Month / year of implementation</b> | <b>Measurable goal</b>                        |
|--|-------------------------------------|---------------------------------------|---|
| Establish or update legal authority and guidelines regarding LID and runoff reduction in site development planning | Planning and Zoning                 | July 1, 2021                          | Modify Planning and Zoning regulations/bylaws |
| Enforce LID/runoff reduction requirements for development and redevelopment projects                               | Zoning Enforcement                  | July 1, 2021                          | Add to site plan review files                 |
| Implement long-term maintenance plan for stormwater basins and treatment structures                                | DPW Director                        | July 1, 2021                          | GIS database                                  |
| Complete DCIA mapping  | DPW Director                        | September 1, 2020                     | GIS database                                  |
| Address post-construction issues in areas with pollutants of concern   | DPW Director                        | July 1, 2021                          | Create spreadsheet and GIS database           |

## (6) Pollution Prevention / Good Housekeeping

This minimum control measure outlines a program to mitigate the impact of town operations and maintenance on town owned and/or operated properties and the MS4 itself to water quality.

**Goal:**

Prevent or reduce pollutant runoff as a result of municipal operations.

Brooklyn will implement an operations and maintenance program to prevent or reduce pollutant runoff from town facilities and protect water quality.

### 6.1 Develop and implement formal employee training program

Brooklyn will establish its MS4 training program for town employees to increase awareness of water quality issues. Training will include:

- Standard operating procedures consistent with the MS4 general permit;
- General goals and objectives of this Stormwater Management Plan;
- Identification and reporting of illicit discharges and improper disposal; and
- Spill response protocols and responsibilities.

These trainings may also include regional or statewide trainings coordinated by UConn CLEAR or others.

CLA Engineers, Inc. to implement training program.

### 6.2 Implement MS4 property and operations maintenance

Brooklyn owned or operated properties, parks, and other facilities that are owned, operated, or otherwise the legal responsibility of Brooklyn will be maintained so as to minimize the discharge of pollutants to its MS4. Such maintenance will include, but not be limited to:

*(i) Parks and open space*

Brooklyn will optimize the application of fertilizers by municipal employees, institutional staff, or private contractors on lands and easements for which it is responsible for maintenance. Optimization practices considered may include:

- conducting soil testing and analysis to determine soil phosphorus levels,
- the reduction or elimination of fertilizers,
- reduction of fertilizer usage by adhering to the manufacturers' instructions,
- use of alternative fertilizers forms (i.e. products with reduced, slow-releasing, or insoluble phosphorus compositions),
- proper storage and application practices (i.e. avoid impervious surfaces),
- application schedule (i.e. appropriate season or month) and timing (i.e. coordinated with climatic conditions to minimize runoff potential);
- standard operating practices for the handling, storage, application, and disposal of pesticides and herbicides in compliance with applicable state and federal laws;

- evaluating reduced mowing frequencies and use of alternative landscaping materials like drought resistant and native plantings;
- establish procedures for management of trash containers at parks (scheduled cleanings; sufficient number).

Brooklyn will establish practices for the proper disposal of grass clippings and leaves at Brooklyn owned lands. Clippings shall be composted or otherwise appropriately disposed. Clippings will not enter the MS4 system or waters of the state.

*(ii) Pet waste management*

Brooklyn will identify locations where inappropriate pet waste management practices are immediately apparent and pose a threat to receiving water quality due to proximity and potential for direct conveyance of waste to its storm system and waters. In such areas, Brooklyn will, implement targeted management efforts such as public education and enforcement (e.g. increased patrol for violators).

In Brooklyn owned recreational areas where dog walking is allowed, Brooklyn will install educational signage, pet waste baggies, and disposal receptacles (or require carry-out).

Brooklyn will document its efforts in its annual reports. Brooklyn should consider including information regarding the scope and extent of its education, compliance, and enforcement efforts (including the number of violations pursued and fines levied or other enforcement taken).

*(iii) Waterfowl management*

Brooklyn will identify lands where waterfowl congregate and feeding by the public occurs. To raise awareness regarding the water quality impacts, Brooklyn will install signage or use other targeted techniques to educate the public about the detrimental impacts of feeding waterfowl (including the resulting feces deposition) and discourage such feeding practices.

Brooklyn will also implement practices that discourage the undesirable congregation of waterfowl in these areas, or otherwise isolate the direct drainage from these areas away from its storm system and waters.

*(iv) Brooklyn Buildings and facilities (schools under the jurisdiction of Brooklyn, town offices, police and fire stations, pools, parking garages and other Brooklyn owned or operated buildings or utilities)*

Brooklyn will:

- evaluate the use, storage, and disposal of both petroleum and non-petroleum products and ensure, through employee training, that those responsible for handling these products know proper procedures;
- ensure that Spill Prevention Plans are in place, if applicable, and coordinate with the fire department as necessary;
- develop management procedures for dumpsters and other waste management equipment;
- sweep parking lots and keep areas surrounding the facilities clean to minimize runoff of pollutants;
- ensure that all interior building floor drains are not connected to the MS4 and are appropriately permitted.

#### *(v) Vehicles and Equipment*

Brooklyn will:

- establish procedures for the storage of Brooklyn owned or -operated vehicles;
- require vehicles with fluid leaks to be stored indoors or in contained areas until repaired;
- evaluate fueling areas owned by Brooklyn and used by Brooklyn owned or operated vehicles and if possible, place fueling areas under cover in order to minimize exposure;
- establish procedures to ensure that vehicle wash waters are not discharged to the municipal storm sewer system or to surface waters;
- ensure any interior floor drains are appropriately permitted.

#### *(vi) Leaf Management*

Brooklyn will establish and implement procedures to minimize or prevent the deposition of leaves in catch basins, streets, parking lots, driveways, sidewalks or other paved surfaces that discharge to the MS4. Such procedures shall also apply to leaves collected by Brooklyn.

### 6.3 Implement coordination with interconnected MS4s

Brooklyn will coordinate with operators of interconnected MS4s (such as neighboring municipalities, institutions and DOT) regarding the contribution of potential pollutants from the storm sewer systems, contributing land use areas and stormwater control measures in the respective MS4s. This same coordination shall be conducted regarding operation and maintenance procedures utilized in the respective systems.

### 6.4 Develop and implement a program to control other sources of pollutants to the MS4

Brooklyn will develop and implement a program to control the contribution of pollutants to its MS4 from commercial, industrial, municipal, institutional or other facilities, not otherwise authorized by a CT DEEP stormwater permit.

### 6.5 Evaluate additional measures for discharges to impaired waters

For waters for which **Bacteria** is a Stormwater Pollutant of Concern:

On Brooklyn owned or operated lands with a high potential to contribute bacteria (such as dog parks, parks with open water, sites with failing septic systems), Brooklyn will develop, fund, implement, and prioritize a retrofit or source management program to correct the problem(s) within a specific timeframe. Each Annual Report will identify problem areas for which a retrofit or source management program were developed, the location of the closest outfall monitored in accordance with Section 6(i), the cost of such retrofit or program, and the anticipated pollutant reduction. On Brooklyn owned or operated lands, prohibit the feeding of geese or waterfowl and implement a program to manage geese and waterfowl populations. Each Annual Report will discuss the actions taken to implement this program.

## 6.6 Track projects that disconnect DCIA

Brooklyn will annually track the total acreage of Directly Connected Impervious Area (DCIA) that is disconnected from the MS4 as a result of redevelopment or retrofit projects within the town. For each retrofit/redevelopment project, Brooklyn will document the amount of existing DCIA that is disconnected. The total amount of disconnected DCIA will be reported each year in the Annual Report. Starting on July 1, 2021, Brooklyn's goal will be to reduce 1% of its total DCIA acreage per year to the maximum extent possible. Brooklyn will provide updates on this goal in its annual report. Brooklyn will also incorporate all DCIA disconnections which occurred in the town since July 1, 2012 towards meeting this goal.

## 6.7 Develop and implement an infrastructure repair, rehabilitation and retrofit program

Brooklyn will begin a program to identify MS4 structures to repair, rehabilitate, or upgrade to reduce or eliminate the discharge of pollutants into water bodies. This program will be responsive to new information on outfalls discharging pollutants, impaired waters, inspections, or observations made during outfall mapping under the IDDE section of this plan.

## 6.8 Develop and implement plan to identify and prioritize retrofit projects

Brooklyn will develop a Retrofit Project Plan to identify and prioritize potential DCIA disconnection projects. Prioritization will be based on several factors, including whether the project lies within one of the MS4 priority areas (urbanized area, DCIA > 11%, discharge to impaired waters). Brooklyn will include in its annual report for the third year of the permit (2020-2021) its identification and prioritization process, a rationale for the selection of projects to be implemented, and the total acres of DCIA to be disconnected upon implementation. The implementation of projects in this plan will begin by June 30, 2022.

## 6.9 Develop and implement street sweeping program

Brooklyn will implement a program to provide for regular inspection and maintenance of Town owned or operated streets, parking areas and other MS4 infrastructure.

Brooklyn will establish and implement procedures for sweeping town-owned or operated streets and parking lots. All streets and parking lots within the MS4 Priority Areas will be inspected, swept and/or cleaned (as necessary) at least once per year in the spring following the cessation of winter maintenance activities (i.e. sanding, deicing, etc.). The procedures shall also include more frequent inspections, cleaning and/or sweeping of targeted areas determined by Brooklyn to have increased pollutant potential based on the presence of active construction activity or other potential pollutant sources. Brooklyn will identify such potential pollutant sources based upon surface inspections, catch basin cleaning or inspection results, land use, winter road deicing and/or sand application, impaired or TMDL waters or other relevant factors as determined by Brooklyn. If wet dust suppression is conducted, the use of water will be minimized such that a discharge of excess water to surface waters and/or the storm sewer system does not occur.

For streets and parking lots outside the MS4 Priority Areas, including any rural uncurbed streets and parking lots with no catch basins, Brooklyn will either meet the minimum frequencies above, or develop and implement an inspection, documentation and targeted sweeping and/or cleaning plan for those areas by June 30, 2018 and submit such plan with its year one Annual Report. For new and redeveloped municipal parking lots, Brooklyn will evaluate options for reducing stormwater runoff to surface waters and/or the storm sewer system by the installing pervious pavements and/or other measures to promote sheet flow of stormwater.

- a. Brooklyn will ensure the proper disposal of street sweepings in accordance with DEEP policies, guidance and regulations. Sweepings shall not be discharged back into the storm drain system and/or surface waters.
- b. Brooklyn will document results of its sweeping program in its annual reports including: a summary of inspection results, curb miles swept, dates of cleaning, volume or mass of material collected, and method(s) of reuse or disposal. Brooklyn will also include documentation of any alternate sweeping plan for rural uncurbed streets and any runoff reduction measures implemented.

## 6.10 Develop and implement catch basin cleaning program

Brooklyn will conduct routine cleaning of all catch basins and track catch basin inspection observations. Utilizing information compiled through its inventory of catch basins, operational staff and public complaints, Brooklyn will optimize routine cleaning frequencies for particular structures or catchment areas as follows to maintain acceptable sediment removal efficiencies:

- a. Inspect all Brooklyn owned catch basins within MS4 Priority Areas at least once by June 30, 2020. Catch basins outside the MS4 Priority Areas shall be inspected by June 30, 2022.
- b. Prioritize inspection and maintenance for Brooklyn owned catch basins located near impaired waters and construction activities (roadway construction, residential, commercial, or industrial development or redevelopment). Brooklyn will clean catch basins in such areas more frequently if inspection and maintenance activities indicate excessive sediment or debris loadings.
- c. Establish a schedule such that the frequency of routine cleaning will ensure that no catch basin at any time will be more than fifty (50) percent full. A catch basin sump is more than 50 percent full if the contents within the sump exceed one half the distance between the bottom interior of the catch basin to the invert of the deepest outlet of the catch basin.
- d. If a catch basin sump is more than fifty (50) percent full during two consecutive routine inspections/cleaning events, Brooklyn will document that finding, investigate the contributing drainage area for sources of excessive sediment loading, and to the maximum extent practicable, abate contributing sources. Brooklyn will describe any actions taken in its Annual Report.
- e. Brooklyn will detail its plan for optimizing catch basin cleaning, inspection plans, and its schedule for gathering information to develop the optimization plan in its first annual report. Documentation shall include metrics and other information used to reach the determination that the established plan for cleaning and maintenance is optimal for the MS4. Brooklyn will keep a log of catch basins cleaned or inspected.
- f. Brooklyn will report in each Annual Report the total number of catch basins, number inspected, number cleaned, the total volume or mass of material removed from all catch basins and, if practicable, the volume or mass of material removed from each catch basin draining to water quality limited waters.

## 6.11 Develop and implement snow management practices

### *Deicing Material Management*

Brooklyn will develop and implement standard operating practices for the use, handling, storage, application, and disposal of deicing products such as salt and sand to minimize exposure to stormwater; consider means to minimize the use and optimize the application of chloride-based or other salts or deicing product (while maintaining public safety) and consider opportunities for use of alternative materials; for any exterior containers of liquid deicing materials installed after July 1, 2017, Brooklyn will provide secondary containment of at least 110% of the largest container or 10% of the total volume of all containers, whichever is larger, without overflow from the containment area.

### *Snow and Ice Control Practices*

Brooklyn will implement and refine its standard operating practices regarding its snow and ice control to minimize the discharge of sand, anti-icing or de-icing chemicals and other pollutants (while maintaining public safety).

Brooklyn will establish goals for the optimization of sand and/or chemical application rates through the use, where practicable, of automated application equipment (e.g. zero-velocity spreaders), anti-icing and pre-wetting techniques, implementation of pavement management systems, and alternate chemicals.

Brooklyn will maintain records of the application of sand, anti-icing and/or de-icing chemicals to document the reduction of chemicals to meet established goals.

Brooklyn will ensure the proper training for deicing applications for municipal employees, institutional staff, or private contractors on lands and easements for which it is responsible for maintenance.

Brooklyn will manage and dispose of snow accumulations in accordance with DEEP's Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots, revised 2/4/11 and as amended (see link at: [www.ct.gov/deep/stormwater](http://www.ct.gov/deep/stormwater)).

In its Annual Report, Brooklyn will document results of its snow removal program including, at a minimum: the type of staff training conducted on application methods and equipment, type(s) of deicing materials used; lane-miles treated; total amount of each deicing material used; type(s) of deicing equipment used; any changes in deicing practices (and the reasons for the change); and snow disposal methods.

## Pollution prevention/ good housekeeping schedule

| <b>BMP</b>  | <b>Lead department / individual</b> | <b>Month / year of implementation</b> | <b>Measurable goal</b>                   |
|---|-------------------------------------|---------------------------------------|--|
| Develop/implement formal employee training program                      | First Selectman                     | Pending Covid-19 Status               | Consultant to implement training program |
| Implement MS4 property and operations maintenance                       | DPW Director                        | September 1, 2020                     | Create maintenance schedule and file     |
| Implement coordination with interconnected MS4s                         | DPW Director                        | September 1, 2020                     | Maintain correspondence with DOT         |
| Develop/implement program to control other sources of pollutants to MS4 | DPW Director                        | September 1, 2020                     | GIS database field                       |
| Evaluate additional measures for discharges to impaired waters          | DPW Director                        | September 1, 2020                     | DPW file                                 |
| Track projects the disconnect DCIA                                      | DPW Director                        | September 1, 2020                     | September 1, 2020                        |
| Develop/implement infrastructure repair/rehab program                   | DPW Director                        | December 1, 2020                      | GIS database field                       |
| Develop/implement plan to identify/prioritize retrofit projects         | DPW Director                        | December 1, 2020                      | GIS database field                       |
| Develop/implement street sweeping program                               | DPW Director                        | July 1, 2020                          | Maintain vendor records or GIS database  |
| Develop/implement catch basin cleaning program                          | DPW Director                        | July 1, 2020                          | GIS database field                       |
| Develop/implement snow management practices                             | DPW Director                        | July 1, 2020                          | Maintain DPW file                        |



## Stormwater Management Plan Signature

Austin Tanner

Chief Elected Official/

Principal Executive Officer

First Selectman

Title

11/18/22

Date

## Stormwater Management Plan Engineering Certification

I hereby certify that I am making this certification in connection with a registration under the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems, submitted to the Commissioner by Richard Ives for an activity located at or within Town of Brooklyn and that all terms and conditions of the general permit are being met for all discharges which have been created, initiated or maintained and such activity is eligible for authorization under such permit. I further certify that a system is in place to ensure that all terms and conditions of this general permit will continue to be met for all discharges authorized by this general permit at the site. I certify that I have personally examined and am familiar with the information that provides the basis for this certification, including but not limited to all information described in Section 3(b)(8)(A) of such general permit, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining such information, that the information upon which this certification is based is true, accurate and complete to the best of my knowledge and belief. I certify that I have made an affirmative determination in accordance with Section 3(b)(8)(B) of this general permit. I understand that the registration filed in connection with such general permit is submitted in accordance with and shall comply with the requirements of Section 22a-430b of Connecticut General Statutes, as amended by Public Act 12-172. I also understand that knowingly making any false statement made in the submitted information and in this certification may be punishable as a criminal offense, including the possibility of fine and imprisonment, under section 53a-157b of the Connecticut General Statutes and any other applicable law.

Darren Hayward, P.E.

Name

Project Engineer

Title

CLA Engineers, INC.

Company

September 27, 2021

Date