

# 2023 Annual Report – MS4 General Permit

**City of Milford**  
Milford, Connecticut

March 2024



Prepared by:



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**MS4 General Permit**  
**City of Milford 2022 Annual Report**  
**Existing MS4 Permittee**  
**Permit Number GSM 000037**  
**January 1, 2023 – December 31, 2023**

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This report documents City of Milford’s efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2023 to December 31, 2023.

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

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

**1.1 BMP Summary**

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
1-1 Implement public education and outreach	Ongoing	Educational materials posted on the City website include the following: <ul style="list-style-type: none"> <li>• Stormwater Management Plan (Engineering Division Webpage)</li> <li>• DPW Service Request Form (Public Works Webpage)</li> <li>• <i>Public Health Impacts of Feeding Waterfowl</i> document (Environmental Health Division, Waterfowl Webpage)</li> <li>• <i>Household Sewer Back Up Protocol</i> (Wastewater Division, Household Sewer Back Up Protocol Webpage)</li> </ul>	Update and maintain City websites to include educational materials.	Stormwater Committee, Public Works	Ongoing	Ongoing	City of Milford Fire Department and City Planning Department coordinate educational Social Media posts encouraging catchbasin clearing preceding major storms. Channel 8, 12, and Fox News report on these events.

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
1-1 Implement public education and outreach <i>(Continued)</i>	Ongoing	6 literature distribution boxes are maintained along two pond areas on the Wepawaug River. CT DEEP “Don’t Feed the Waterfowl” brochures are distributed through their efforts.	Distribute educational materials.			Ongoing	
	Complete/ongoing	Rain garden installed at East Shore Middle School in 2020. Annual maintenance includes tagging invasive species to be removed and servicing the rain garden.	Involve School and Public for outreach and maintenance	Public Works, CT Master Gardeners Program, CIRCA and UCONN		Completed in 2020	Maintenance activities are used for training and service hours.
1-2 Address education/ outreach for pollutants of concern	Ongoing	CT DEEP “Don’t Feed the Waterfowl” education program targets bacteria pollution problems, which is a pollutant of concern for 6 impaired waters in the City.	Select educational materials appropriate for impaired waters and stormwater pollutants of concern	Stormwater Committee, Public Works	Ongoing	Ongoing	

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

- Continue to add education and outreach materials to the City website and other forms of social media.
- Continue to maintain CT DEEP “Don’t Feed the Waterfowl” brochures.
- Fire Department will continue to distribute the yard waste disposal outreach presentation and reminders for pickup periodically to the public.
- Continue social media posts surrounding catchbasin clean-out efforts in preparation for major storm and flooding events.
- Earth Day events and presentations to be planned at the Milford Library and the Fowler Pavilion.

### 1.3 Details of activities implemented to educate the community on stormwater

Program Element/Activity	Audience (and number of people reached)	Topic(s) covered	Pollutant of Concern addressed (if applicable)	Responsible dept. or partner org.
"Don't Feed the Waterfowl" brochures	<ul style="list-style-type: none"> <li>Community residents</li> <li>Over 2000 brochures to date</li> <li>Signage posted at several impoundments downtown</li> </ul>	<ul style="list-style-type: none"> <li>Impact of feeding waterfowl on water quality/pollution</li> </ul>	<ul style="list-style-type: none"> <li>Bacteria</li> </ul>	<ul style="list-style-type: none"> <li>Open Space and Natural Resource Department</li> </ul>
Parsons Building Rain Garden Maintenance	<ul style="list-style-type: none"> <li>Regular maintenance as part of Master Gardener Training Program</li> <li>Brochure distributed at various events</li> </ul>	<ul style="list-style-type: none"> <li>Rain garden weeding</li> <li>Native plant education</li> <li>Stormwater quality</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Cheryl Cappiali, Master Gardener</li> <li>City of Milford</li> <li>Southwest Conservation District</li> <li>CTDEEP</li> </ul>
UConn Rain Garden Grant Project	<ul style="list-style-type: none"> <li>A group of students studied City-owned properties and made recommendations for potential rain garden locations. The City installed a rain garden at East Shore Middle School in the Spring of 2020</li> <li>Continuing to explore potential locations and opportunities for more rain garden installations.</li> </ul>	<ul style="list-style-type: none"> <li>Rain Gardens, including multiple at East Shore Middle School</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
Milford Tree Giveaway – Earth Day Event held in April of 2023	<ul style="list-style-type: none"> <li>500 trees given away to residents</li> </ul>	<ul style="list-style-type: none"> <li>Tree giveaway with educational materials</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Open Space and Natural Resource Department</li> </ul>

Program Element/Activity	Audience (and number of people reached)	Topic(s) covered	Pollutant of Concern addressed (if applicable)	Responsible dept. or partner org.
Earth Day Education Outreach for Kids		<ul style="list-style-type: none"> <li>Hands-on activity for kids to learn about pollution in the watershed</li> </ul>	<ul style="list-style-type: none"> <li>Watershed Pollution</li> </ul>	<ul style="list-style-type: none"> <li>IWA/HMWG</li> </ul>
Social Media Postings		<ul style="list-style-type: none"> <li>Education on cleaning catch basins prior to storm events</li> </ul>	<ul style="list-style-type: none"> <li>Catch Basin Cleaning / Pollutant</li> </ul>	<ul style="list-style-type: none"> <li>Fire Department and City Hall Social Media Pages</li> </ul>
Walnut Beach/Silver Sands Boardwalk Litter Mitigation	Kiosk has been used extensively by residents to do mini cleanups when visiting the beach	<ul style="list-style-type: none"> <li>Permanent anti-litter kiosk installed in May of 2023, it is stocked with litter grabbers and mesh bags year-round</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Partnership with the City and Garbo Grabber</li> </ul>
Community Cleanups <ul style="list-style-type: none"> <li>Tudor Road Woods</li> <li>Wilcox Park</li> <li>Red Bush Woods</li> <li>Eisenhower Park</li> <li>MLCT Carriage Drive</li> <li>MLCT – Frist Avenue</li> <li>MLCT Stiles Street</li> <li>Naugatuck Ave Gazebo</li> <li>Walnut Beach Woods</li> <li>MLCT – Anchorage Drive</li> <li>Boston Post Road</li> <li>20 Weeks of Master Gardener Program (2+ days per week)</li> </ul>	<ul style="list-style-type: none"> <li>The City assisted multiple community cleanups throughout 2023 with about 300 residents cleaned at least 17 different sites, totaling over 700 hours of volunteer time.</li> </ul>	<ul style="list-style-type: none"> <li>Litter clean-up</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Open Space and Natural Resource Department and Department of Public Works</li> <li>Conservation Commission</li> <li>Milford Democratic Town Committee</li> <li>Red Bush Neighborhood</li> <li>YMCA</li> <li>Republican Town Committee</li> <li>Milford Land Conservation Trust</li> <li>Island Sands Condominium</li> <li>Scout Troop 76</li> <li>Thule Group</li> </ul>

## 2. Public Involvement/Participation (Section 6(a)(2) / page 21)

### 2.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-1 Comply with public notice requirements for the Stormwater Management Plan and continue availability of Final Stormwater Management Plan to the public	Complete	The draft Stormwater Management Plan was made available to the public: <ul style="list-style-type: none"> <li>An electronic copy was posted on the City's website.</li> </ul>	Make draft Stormwater Management Plan available electronically on the City website and paper copies available in the Engineering Offices by Apr 1, 2019. Publish notice of availability on website or local newspaper.	Engineering, Public Works	Apr 3, 2017	April 3, 2017	The City's Stormwater Management Plan is available on the City's website.
	Complete	The final Stormwater Management Plan was made available to the public: <ul style="list-style-type: none"> <li>An electronic copy was posted on the City's website.</li> </ul>	Make final Stormwater Management Plan available electronically on the City website and paper copies available in Engineering Offices.		Ongoing	May 2017	
2-2 Comply with public notice requirements for Annual Reports	Complete	Notice of annual report was posted to the City website on January 3, 2024. Draft Annual Report was made available for public comment on February 22, 2024.	Make draft annual report available electronically on the City website and paper copies available in engineering Offices. Publish notice of availability on website(s) or local newspaper.	Engineering, Public Works	Feb 15, 2024	Feb 22, 2024	
	In Progress	The City will finalize the draft 2023 Annual Report and will submit it to DEEP, as well as post it on the town website by the April 1, 2024 deadline.	Make final annual report available electronically on the City website.		Apr 1, 2024	Anticipate completion by Apr 1, 2024	



BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-3 Work with area organizations and groups	Ongoing	Stormwater staff met periodically throughout the reporting period. City of Milford Staff (Steve Johnson, Fire Department, and MaryRose Palumbo) hold meetings before and after severe storm events, typically at site of flooding to bring a heightened awareness to drainage issues throughout the City.	Conduct regular meetings of the Milford Stormwater Committee	Engineering, Public Works, Inland Wetlands	Ongoing	Ongoing	Public Works stages barriers and provides early notification to residents and businesses.
	Ongoing	<ul style="list-style-type: none"> <li>• Coastal Wetland Litter Clean-ups                             <ul style="list-style-type: none"> <li>○ Mackenzie's Annual</li> <li>○ Coastal Litter Clean-ups</li> <li>○ Land Trust Clean-ups</li> <li>○ CT Audubon Society</li> <li>○ Boy Scout Troupes</li> </ul> </li> <li>• Rain Garden/Garden projects                             <ul style="list-style-type: none"> <li>○ Cheryl Cappiali, Master Gardener Program</li> <li>○ Southwest Conservation District</li> <li>○ CTDEEP</li> <li>○ UCONN</li> </ul> </li> <li>• Milford Conservation Commission Dune Maintenance</li> </ul>	Work with local organizations (ECC, etc.) to identify public involvement opportunities and assist with plan implementation.	Stormwater Committee		Ongoing	

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

- Continue to participate as a registered community in the Sustainable Connecticut initiative. Milford continues to maintain Silver Level certification in the Sustainable CT program in 2024.
- Continue to hold regular meetings that cover stormwater-related topics, such Multi-Hazard Mitigation Plan Meetings, Inland Wetlands Meetings, Conservation Commission, and various volunteer organizations.
- Continue ongoing Coastal Resiliency Projects. Hold related public information and outreach meetings and monthly discussions.
- Continue to implement software programs allowing the City to track MS4 metrics through permit applicant inputs.
- Continue to involve the public in annual reporting process.

**2.3 Public Involvement/Participation reporting metrics**

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan to public	Yes	May 2017	<a href="https://www.ci.milford.ct.us/engineering-division">https://www.ci.milford.ct.us/engineering-division</a>
Availability of Annual Report announced to public	Yes	January 3, 2024	<a href="https://www.ci.milford.ct.us/home/news/ms4-annual-notice">https://www.ci.milford.ct.us/home/news/ms4-annual-notice</a>

### 3. Illicit Discharge Detection and Elimination (Section 6(a)(3) and Appendix B / page 22)

#### 3.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	Complete	The Engineering Division has adopted the EPA "Illicit Discharge Detection and Elimination: manual (2004), as the City's IDDE program and diligently applies it as part of the review process.	Prepare IDDE Plan for the City.	Engineering, Public Works	Jul 1, 2018	Jul 1, 2018	
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	Complete	The City has made stormwater mapping and GIS available on the Engineering Department website.	Update GIS MS4 mapping to include all stormwater outfalls in the municipality.	Engineering, Public Works, GIS	Jul 1, 2019	Dec 31, 2017	
	Complete	The City has gathered information on outfalls and has adopted a new software program (Municipality) that is being used to collect and manage data.	Develop a list (database or spreadsheet) including required elements listed on page 24 of 50 of the General Permit for all stormwater outfalls in municipality.			Completed in 2021	
3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas (cont.)	Complete	The City has gathered information on relevant MS4 items. The City has adopted a new software program (Municipality) that is being used to collect and manage data.	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.		Jul 1, 2020	Completed in 2021	The City has documented all known outfalls within GIS.

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-3 Implement citizen reporting program	Complete	Reporting continues to occur through the City's online service request system.	Continue to use the online comment area on the City's webpage as a citizen reporting 'hotline' and advertise it on the City website and in municipal offices.	Engineering, Public Works	Jul 1, 2017	Jul 1, 2017	
3-4 Establish legal authority to prohibit illicit discharges	Complete	Section 23-102 of the Milford Code of Ordinances addresses Illicit Connections and Discharges. Section 23-108 specifically addresses Illegal Discharges. Section 23-109 addresses Suspension of MS4 Access.	Review City's existing ordinance related to illicit discharge and revise, as necessary.	Planning and Zoning	Jul 1, 2018	Jun 4, 2018	
3-5 Develop record keeping system for IDDE tracking	Complete	The Health, Engineering, and Public Works Departments are responsible for tracking and logging incoming reports and responses.	Develop IDDE tracking recordkeeping system.	Health, Engineering, Public Works	Jul 1, 2017	Jul 1, 2017	
3-6 Address IDDE in areas with pollutants of concern	Ongoing	The City has worked with the Health Department to complete the review of areas containing septic systems. As there are few areas of the City being served by septic systems, the Health Department did not have enough information to identify areas of high potential for septic failure.	Identify areas with high potential for septic system failure.	Engineering, Public Works	Not specified	Ongoing	There are few areas of the City still being served by septic systems.  Future failures will be logged in the City's Municipality tracking system.

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-7 Conduct SSO inventory	Complete	Review of records was conducted to determine all SSOs from July 1, 2012 to June 30, 2017.	Review City records to identify any known locations where SSOs have discharged to the MS4 within the previous 5 years (July 1, 2012 – June 30, 2017).	Engineering, Public Works, Wastewater Division	Oct 29, 2017	Feb 7, 2018	
3-8 Assess and prepare a priority ranking of catchments	In Progress	The City documents the volume of debris removal from each catch basin.	Classify each catchment into an excluded, problem, high priority, or low priority catchment.	Engineering, Public Works	Jul 1, 2019 (initial)	Anticipated completion by Dec 31, 2025	
	In Progress	The City is seeking funding and will be contracting with a consulting firm to complete this task.	Rank catchments within each category (except excluded catchments) based on screening factors found on page 6 & 7 in Appendix B of the General Permit.			Anticipated completion by Dec 31, 2025	
3-9 Conduct outfall and interconnection screening and sampling	In Progress	The City is seeking funding and will be contracting with a consulting firm to complete this task.	Conduct dry weather screening and sampling (where flowing) of every MS4 outfall and interconnection (except for excluded and Problem Catchments).	Engineering, Public Works	Jul 1, 2019	Anticipated completion by Dec 31, 2025	
3-10 Conduct catchment investigations and Remove illicit discharges	In Progress	The City is seeking funding and will be contracting with a consulting firm to complete this task.	Evaluate catchments for System Vulnerability Factors and begin catchment investigations.	Engineering, Public Works	Jul 1, 2018	Anticipated completion by Dec 31, 2026	
	In Progress	The City is seeking funding and will be contracting with a consulting firm to complete this task.	Where System Vulnerability Factors are present, conduct manhole inspections. Isolate and verify sources. Remove identified illicit discharges and conduct confirmatory outfall screening.		Jul 1, 2020	Anticipated completion by Dec 31, 2026	

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

BMP	
3-10 Conduct catchment investigations and remove illicit discharges	During regular monitoring of sewer mains, forcemains and laterals, areas that would benefit from sewer lining are evaluated for project award dependent on funding. The following area has been identified as a potential illicit discharge source that the City has addressed: 1. Line sewer force main under the Wepawaug River (Completed in 2021)

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

- Assess and prepare a priority ranking of catchments.
- Conduct dry weather outfall screening and sampling.
- Evaluate catchments for System Vulnerability Factors and begin catchment investigations.
- Implement reporting options to the online reporting system with language directly referencing illicit discharge activities and add a link to the system from the City's Stormwater page.
- Continue updating MS4 mapping as necessary.
- Coordinate with DOT to obtain MS4 interconnections mapping.

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

Date of Report	Location / suspected source	Response taken
1/26/2023	1255 Oronoque Road / Heavy Rainfall (1-2" per hour) (20 gallons)	Complaint received by WWTP Operating Staff. Wet weather operating procedures taken, I&I mitigation
2/11/2023	180 Melba Street / Force Main Blockage (10 gallons)	Complaint received by Fire Department. Jetting and CCTV of Force Main
4/25/2023	306 West River Street / Force Main Blockage	Complaint received by Police. Jetting and CCTV of Force Main
4/26/2023	1255 Oronoque Road / Force Main Blockage	Complaint received by daily testing results at WWTP. Wet weather operating procedures, I&I mitigation through SSES
5/1/2023	1255 Oronoque Road / Heavy Rainfall	Complaint received by observation at WWTP. Wet weather operating procedures, I&I mitigation through SSES
5/17/2023	1255 Oronoque Road / Heavy Rainfall	Complaint received by daily testing results at WWTP. Wet weather operating procedures, I&I mitigation through SSES
7/18/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP. Treatment Plant received a volume of low pH wastewater – no treatment possible
7/19/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP. Treatment Plant received a volume of low pH wastewater – no treatment possible

Date of Report	Location / suspected source	Response taken
7/20/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP. Treatment Plant received a volume of low pH wastewater – no treatment possible
9/12/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP. Inspected UV Disinfection process – Equipment was functioning normally
9/13/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP. Inspected UV Disinfection process – Equipment was functioning normally
9/21/2023	1255 Oronoque Road / Unknown	Complaint received by daily testing results at WWTP.
11/28/2023	196 3 <sup>rd</sup> Avenue / Force Main Cracked Pipe (~1000 gallons)	Complaint received by DPW. Repaired Force Main
12/11/2023	1255 Oronoque Road / Heavy Rainfall (2-3" per hour)	Complaint received by observation at WWTP. Wet weather operating procedures, I&I mitigation through SSES

**3.4 Provide a record of illicit discharges occurring during the reporting period and SSOs occurring July 2012 through end of reporting period using the following table.**

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
89 Bridgeport Avenue	06/12/2012	MS4	Unknown	Sewer leaking at rear of property onto Bridgeport Ave	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Wastewater Department was contacted. Assigned to Gregory Peters. Resolved.	
9 Ellis Street	06/12/2012	MS4	Unknown	Report of possible sewage overflow at property	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Gregory Peters. Resolved.	
1201 Boston Post Road	11/29/2012	Unknown	Unknown	Unknown – Strong sewage odor behind stores and management office in vicinity of Target, Foot Locker, and Charlotte Russe	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. Resolved.	

<b>Location</b> (Lat long/ street crossing /address and receiving water)	<b>Date and duration of occurrence</b>	<b>Discharge to MS4 or surface water</b>	<b>Estimated volume discharged</b>	<b>Known or suspected cause / Responsible party</b>	<b>Corrective measures planned and completed</b> (include dates)	<b>Sampling data</b> (if applicable)
7 Cindy Circle	01/16/2013	MS4	Unknown	Pipe coming out of back of home and depositing raw sewage into 10 x 10 hole	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. Resolved.	
40 Gulf Street	03/01/2013	MS4	Unknown	Unknown – Raw sewage coming up in back yard	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. Resolved.	
9 Ash Street	07/01/2013	MS4	Unknown	Unknown – Raw sewage in back yard of apartment building serviced by sewer. Tenant reports duration of discharge as 5 months	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Tara Mustakos. Resolved.	
561 New Haven Avenue	07/17/2013	MS4	Unknown	Overflow of sewage outside of Family Mart building	Reported by Robin Lynch from Engineering and Sewer Commission. Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. Resolved.	
7 Cindy Circle	04/21/2014	MS4	Unknown	Open pit in rear yard – Dwelling may/may not be tied into sanitary sewers	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. Resolved.	
367 Bridgeport Avenue	08/28/2014	Unknown	Unknown	Unknown – Strong sewage odor at Dunkin Donuts	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. Resolved.	
1292 Boston Post Road	09/23/2014	Unknown	Unknown	Unknown – Strong sewage odor at Burger King	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Gregory Peters. Resolved.	

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
92 E Broadway	09/10/2015	MS4	Unknown	Sewage spill at apartment complex	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. Resolved.	
50 Wilson Street	04/03/2017 Over 1 year	MS4	Unknown	Septic system failure during heavy rain	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. In progress. On-site inspection with complainant 04/04/17. Warning letter sent to property owner 04/17/17. Owners will be required by ordinance to hook up to city sewer. NOV issued 07/11/17.	
23 Flax Mill Terrace	05/03/2017	MS4	Unknown	Report of un-permitted SSDS being installed on property	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. Resolved.	
323 Wheelers Farms Road	05/12/2017	MS4	Unknown	Septic system failure	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. In progress. Site visit 05/16/17. Phone message left for owner 05/17/17.	
64 Seaside Ave	05/29/2017	MS4	Unknown	Septic system failure	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Gregory Peters. Resolved.	
680 Wheelers Farms Road	06/14/2017	MS4	Unknown	Septic failure/breakout at rear of property	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Robert Grive. Resolved. Met with property owner 06/20/17. Coordination with inland wetlands indicates need for a survey of wetlands and watercourses 06/21/2017. Soil tests conducted 08/15/2017. Septic system plans under design, review, and revision 10/17 to 11-17. New septic system installed 01/23/18.	

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
Merwin Avenue/Mark Street	06/21/2017 2 days	Unknown	Unknown	Report of sewage odor lasting two days	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Laura Miller. Resolved.	
433 Old Gate Lane	3/15/2018	MS4	<30 gal.	Diesel Fuel Leak	DEEP Dispatch, leaking saddle tank at Pilot Travel Center	
157 Cherry Street	3/23/2018 2 days	MS4	~150 gal.	Restaurant grease trap overflow Stubby Plain Brook wetlands	Health Dept. responded to a reported sewage complaint and determined it to be grease. They worked with Restaurant Building owner, who consulted WSP environmental firm and United pumped out grease and repaired grease trap pump to resolve overflow and cleanup.	
540 New Haven Ave	4/25/2018	MS4	Unknown	Unknown green substance, possibly from adjacent car wash	DEEP Dispatch, Fire Dept responded.	
83 Ford Street	5/14/2018	MS4	Unknown	Hydraulic oil release due to broken hose	Spill prevention measures activated for clean-up. Fire Dept notified.	
714-730 Boston Post Road	5/17/2018	SSO	7,000 – 8,000 gal. Est. 50% to Wepawaug River.	Sanitary Sewer Force Main break	City bypassed pump station to stop the leak and did emergency repair. Completed 5/19 – 5/20.	
258 Boston Post Road	5/22/2018	MS4	5 gal.	Gasoline leak at Cumberland Farms	Vac truck dispatched to catch basin at location	
75 Edgefield Street	6/1/2018	SSO to catch basin and LIS at Burwell St.	3,000 – 4,000 gal. Est	City sanitary sewer	City's WWTF responded to force main break and repaired.	
57 New Haven Ave	6/1/2018	MS4	~ 10 gal.	Hydraulic hose broke Street Sweeper	Oil contained in catch basin. City Spill Prevention measures activated for containment and cleanup	
738 Boston Post Road	6/10/2018	SSO – Wepawaug River	Unknown	City Sanitary Sewer Force main break & leak	City bypassed pump station to stop the leak and did emergency repair completed 6/11/2018, 15:00 hr. No Fishing / Swimming Signs posted at Wepawaug River North St & City Hall ponds. Water samples on 6/11 & 6/12 that included both regular scheduled beach and 4 additional locations.	Within allowable limits, 6/11 & 6/12 samples

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44 Rose Street	6/22/2018	MS4 – LIS	Unknown	Diesel from vessel	Spencer's Marina	
9 Seaview Ave	6/23/2018	MS4 - LIS	15 gal.	Capsized boat leaked fuel	USCG, Fire Dept. dispatched	
16 New Haven Ave.	7/12/2018	MS4	Unknown	Restaurant grey water from floor washing	MHD responded. Mob sink required to be installed to prevent grey water from being dumped to road and catch basins. Letter sent 8/2/18.	
831 Oronoque Rd	7/26/2018	MS4	~ 50 gal.	Hydraulic Oil leak due hose line failure, Milford Transfer Station	Fire Dept. – Spill Prevention Measures initiated	
685 Broadway	7/27/2018	MS4 - LIS	Unknown	Sewage Order Report	DEEP Dispatch	
121 North Street	8/3/2018	MS4	Unknown	Dump truck fire	Extinguished by Fire Dept. Fuel tanks did not leak. Unknown what other fluids entered catch basin.	
1 Helwig Street	9/9/2018	MS4-LIS	Unknown	40' Clam boat fire at Milford Harbor	Fire Extinguished by Local Fire Dept. Disconnected fuel connections, only minor seepage occurred.	
I-95 South Exit 36	9/13/2018	MS4	Unknown	Tractor Trailer & MV Accident	Diesel Fuel into catch basin. CT Tank Removal responded for cleanup.	
20 Wall Street	9/14/2018	MS4	Unknown	LGB Pool Company dumping water into catch basin	Unknown	
I-95 South, Exit 40	10/08/2018	MS4	80 gal.	Tractor Trailer Accident	Diesel Fuel leak into catch basin. Fire Dept. responded.	
365 Old Gate Lane	1/3/2019	MS4	50 gallons	Diesel fuel released during fire	Local fire departed responded.	
Silver Sands	3/19/2019	Marsh	Unknown	Fire runoff from buildings on fire	Local fire department responded to fire.	
500 Bic Drive	5/9/2019	MS4	Unknown	Heavy odor of gasoline in MS4	Potential illicit discharge was investigated. The cause is unknown.	
19 Summer Place	5/28/2019	Tidal marsh behind property	Unknown	Oil waste items were found in tidal marsh	Spill was investigated.	
West River Street	6/7/2019	Wepawaug River	200 gallons	Force main leak bubbled up onto roadway	6/7/2019 – Station shut down and flow was redirected to the Rodgers Avenue Pump Station.	

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
117 Bridgeport Avenue	6/14/2019	MS4	Unknown	Cracked sewer pipe	6/17/2019 – Property owner had contractor repair the cracked sewer pipe and clean the area. 6/24/2019 – The pipe was found leaking again. The issue was identified as a loose cap that was then secured. 6/27/2019 – A follow-up inspection confirmed that the leaking had been addressed.	
I-95 North Reststop	10/16/2019	MS4	~1 gallon	Motor oil from hose failure	Local fire department responded.	
365 Old Gate Lane	10/17/2019	MS4	~60 gallons	Petroleum spill at gas station	Corrective measures completed are unknown.	
734 Naugatuck Ave	12/18/2019	MS4	Unknown	Batter fire with battery acid into storm drains	Fire extinguished by local fire department	
Naugatuck Avenue	12/19/2019	Long Island Sound	51 - 500 gallons	Sewer force main break / Contractor hit force main	12/29/2019 – Contractor repaired sewer force main.	
Pepe Farms Road	4/10/2020	Gulf Pond	0-50 gallons	COVID-19 Ragging Issue	Rapid response to event mitigated with jetter, pipe CCTV was performed to assess any defects.	
716 E Broadway	7/21/2020	Long Island Sound	Unknown	Pipe coming out of back of home and depositing sewage onto yard	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Paul Scholz. Resolved.	
Silver Sands	7/21/2020	Marsh	Unknown	Report of sewage in water flowing through the marsh	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Tara Mustakos Wassmer. Material was noted to be all organic material and not sewage.	
Knobb Hill Road	1/4/2021	Unknown	Unknown	Sewage backup (roots/rags)	Blockage was cleared and location was added to the maintenance program and schedule for CCTV	
146 High Street	3/19/2021	Unknown	Unknown	Service lateral backup (roots)	Blockage was cleared and location was added to the maintenance program and schedule for CCTV	
1460 Boston Post Road	7/10/2020	Unknown	Unknown	Grease dumpster spill	Complaint was received by Milford Health Department, investigated and handled by Health Department or referred to appropriate City Agency for follow-up. Assigned to Timothy Noia. Resolved.	

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
1255 Oronoque Road	7/6/2021	n/a	20 gallons	Aerating a full WAS tank caused minor sludge spill on walkway	Sludge returned to tank and area cleaned, increase tank monitoring and cover secured	
590 West Avenue	7/9/2021	Beaverbrook Pond	50,000 gallons	High flow caused generator to trip while trying to run four pumps	Breakers reset, generator planned to be replaced	
1255 Oronoque Road	7/9/2021	Housatonic River	Unknown	Excessive flow caused plant to bulk	Assess for pump station upgrade	
95 Meadowside Drive	9/2/2021	Long Island Sound	1,000 gallons	Valve vault flooded and submerged control panel	Control panel replaced 3' above 100 year flood line	
417 Woodmont Road	3/31/2022	Street and Catch Basin on Woodmont Road	100	Roots present in manhole caused backup	Manhole was pumped down with septic truck, roots were removed and root control applied within manhole.	
1255 Oronoque Road	8/28/2022	Street (Caswell Marina)	4,000	Pipe was plugged, tank filled automatically and drained through overflow pipes.	2 vacuum trucks, jetting, sandbags, and naturally contained by area. Implemented high tank alarms to SCADA and having operators check daily.	
1255 Oronoque Road	10/24/2022	Housatonic River	N/A	Lead wire for the piping pump came loose	Additional banks were brought online and run at 100% power. New operators are being trained and ongoing maintenance is performed.	
29 Ingersol Road	3/25/2022	Unknown	Unknown	Blockage / Cause undetermined		
165 Gulf Street	7/3/2022	Unknown	Unknown	Blockage	Repaired	

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

The Health, Engineering, and Public Works Departments are responsible for tracking and logging incoming reports and responses. Engineering Department staff track illicit discharge information in the field. The Engineering Department is observant during routine site inspections, which includes Pre-Construction and as-built inspections of curbs, sidewalks, driveway aprons, and sanitary sewer laterals; “Call Before You Dig” mark-outs; site inspections in preparation of Land Use Application (Zoning, ZBA, CAM, IWA) reviews; site inspections in preparation of as-built site plan reviews; performing land surveys. The Fire Department is the lead agency with regards to environmentally sensitive spills or other illicit discharges. They will coordinate the response with other departments as applicable.

**3.6 Provide a summary of actions taken to address septic failures using the table below.**

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known
No septic failures reported during 2023		

**3.7 IDDE reporting metrics**

Metrics	
Estimated or actual number of MS4 outfalls	873
Estimated or actual number of interconnections	0
Outfall mapping complete	100%
Interconnection mapping complete	100%
System-wide mapping complete (detailed MS4 infrastructure)	100%

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

Although there is no specific training directly to IDDE, the City Engineer routinely attends in person and web-based training and seminars where IDDE is addressed as a portion of the program. Topic-specific training is provided annually to staff. Annual training includes:

- Spill Response training for Public Works and Wastewater employees
- Fuel pump training
- Salt brine spill training for Public Works employees
- Training through trade publications, stormwater-related webinars and seminars, and professional meetings
- Use of the EPA IDDE Guidance Manual for reference as needed

## 4. Construction Site Runoff Control (Section 6(a)(4) / page 25)

### 4.1 BMP Summary

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations or other legal authority to meet requirements of MS4 general permit	Complete	Land use regulations were reviewed and revised to address construction site stormwater runoff control measures. Changes were adopted on July 26, 2019.	Review and update, as necessary, existing land use regulations and implementation policies for compliance with the MS4 General Permit construction site stormwater runoff control requirements.	Planning and Zoning, Zoning Enforcement Officers	Jul 1, 2019	Jul 26, 2019	
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	Ongoing	<p>Department of Permitting and Land Use (DPLU) provides copies of applications to Engineering Department for review and comments. Sewer/Health and Inland Wetlands also review and report back.</p> <p>IWA reviewed 73 permits and Jurisdictional Rulings, along with 75 building and zoning tasks for sedimentation and erosion control and stormwater management.</p>	Implement interdepartmental coordination procedures as described in Section 5.2 of this Plan.	Planning and Zoning, Engineering, Public Works, Inland Wetlands Agency	Ongoing	Ongoing	



BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-3 Review site plans for stormwater quality concerns	Ongoing	Site Plans are reviewed by the Engineering Division and Inland Wetlands for stormwater quality concerns. Site Plans reviewed in 2023 include those plans submitted for Land Use Permits (Zoning (38), IWA (24), CAM (50)) and As-built Site Plans (56) submitted for CO and/or bond release.	Continue to complete site plan reviews for all projects subject to the land use regulations listed in BMP 4-1.	Planning and Zoning, Engineering, Inland Wetlands Agency	Ongoing	Ongoing	Developers/Contractors are made aware that the City Engineering Department is available for any questions they may have.
4-4 Conduct site inspections	Ongoing	The Engineering Division routinely reviews all plans submitted to it through Zoning and Inland Wetlands for compliance with stormwater treatment and mitigation and potential for Illicit Discharge. Reviews routinely include site visits by Engineering Division staff. In addition, Engineering Division encourages Applicants and their Professional Consultants to make pre-application submission so that potential issues may be identified and corrected in the earliest planning stages.	Continue to conduct inspections and enforcement to assess and ensure the adequacy of the installation, maintenance, operation, and repair of construction and post-construction control measures.	Engineering, Planning and Zoning, Zoning Enforcement Officers, Inland Wetlands Agency	Ongoing	Ongoing	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-5 Implement procedure to allow public comment on site development	Complete		Continue to use the online comment area on the City's webpage as a citizen reporting 'hotline' and advertise it on the City website and in municipal offices.	Planning and Zoning	Ongoing	Jul 1, 2017	
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	Ongoing	The City continues to inform developers/contractors of their potential obligations under the DEEP construction general permit. A physical draft notification has been prepared and is under internal review. This notification is included as a handout in the permitting process and will be printed on the back of City applications moving forward.	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 Milford upon request.	Planning and Zoning	Ongoing	Ongoing	
	Ongoing	The City continues to develop their Website to reflect up to date resources for post-construction activity, specifically outlining stormwater mitigation requirements.	Continue to inform developers/contractors of their obligations for stormwater mitigation requirements during all stages of construction.	Planning and Zoning	Ongoing	Ongoing	

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

- Continue to implement interdepartmental coordination in plan review, involving DPLU, Engineering, and Inland Wetlands.
- Continue inspections and enforcement of current regulations, review regulations to consider including provisions for controlling construction wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary wastes at the construction site that may cause adverse impacts to water quality.
- Continue to document the number (per permit year) of construction plan submittals, construction startups, and construction inspections and report these numbers in their annual reports.
- Implement a handout or bookmark to give out to inform developers/contractors of obligation to register under the construction general permit.

**5. Post-construction Stormwater Management (Section 6(a)(5) / page 27)**

**5.1 BMP Summary**

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	Complete	Engineering Division published standards currently require, as a minimum, a zero net increase based upon a 25-year, 24-hour storm. All site plans are reviewed for compliance with the CTDEEP requirements for WQV. The City has already implemented the new minimum WQV of 1.3" (Per New SWQM effective March 30, 2024) on their website, required for all developments as of 1/1/24.	Review and update, as necessary, existing land use regulations and implementation policies (including Engineering Division design guidelines) for compliance with the General Permit post-construction stormwater requirements.	Planning and Zoning, Engineering	Jul 1, 2021	Completed in 2020	Engineering Department regularly reviews regulations and checks compliance with DEEP standards.

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	Ongoing	Engineering Division published standards currently require, as a minimum, a zero net increase based upon a 25-year, 24-hour storm. All site plans are reviewed for compliance with the CTDEEP requirements for WQV. The City has already implemented the new minimum WQV of 1.3" (Per New SWQM effective March 30, 2024) on their website, required for all developments as of 1/1/24.	Review and update, as necessary, current regulations to identify, reduce, or eliminate existing regulatory barriers to implementation of LID and runoff reduction practices.	Planning and Zoning, Engineering	Jul 1, 2021	Ongoing	
	Ongoing	Plans are reviewed by Engineering for runoff reduction, elements of LID practices, and compliance with DEEP minimum standards for Water Quality Volume ("WQV"), runoff generated by first 1.3" of rainfall (Per new SWQM effective March 30, 2024).	Complete plan reviews and ensure compliance for all projects subject to the legal authority and/or guidelines listed in BMP 5-1.		Ongoing beginning Jul 1, 2019	Ongoing	
5-3 Identify retention and detention ponds in priority areas	Complete	The City is documenting the City-owned detention and retention ponds.	Identify stormwater basins and treatment systems in priority areas and include them in GIS mapping.		Jul 1, 2019	Dec 31, 2024	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	Ongoing	Engineering Department requires submission of detailed operations and maintenance plans for all developments larger than individual single-family residences.	Develop a long-term maintenance plan for retention/ detention basins and stormwater treatment structures.	Planning and Zoning, Engineering	Ongoing beginning Jul 1, 2019	Ongoing	
	Ongoing	Engineering Department requires submission of detailed operations and maintenance plans for all developments larger than individual single-family residences.	Implement maintenance plan including annual inspection of retention/ detention basins and stormwater treatment structures and removal of accumulated sediment and pollutants.	Engineering, DPW		Ongoing	
5-5 DCIA mapping	In Progress	The City is seeking funding for baseline DCIA mapping.	Calculate the Directly Connected Impervious Area (DCIA) of outfall catchment areas using guidance provided by DEEP and UConn CLEAR.	Planning and Zoning, Engineering	Jul 1, 2020	Anticipate completion by Dec 31, 2025	
	Ongoing		Revise DCIA estimate as development, redevelopment, or retrofit projects effectively add or remove DCIA.		Annually beginning Jul 1, 2021	Ongoing	The City will implement their tracking software in order to document these metrics to include in mapping.
5-6 Address post-construction issues in areas with pollutants of concern	Ongoing	Although the Engineering Division does not have a formal schedule for post-construction monitoring, staff documents observations in the conduct of other field work. We also respond in response of resident complaints, as applicable.	Address erosion and sediment problems noted during inspections conducted under BMP 5-3 through the retrofit program developed under BMP 6-7.	Engineering, Public Works	Not specified	Ongoing	

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

- Develop estimates of baseline DCIA.
- Identify City-owned detention and retention ponds and other stormwater treatment structures.
- Prepare an O&M manual for City-owned and/or maintained stormwater treatment structures.

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

DCIA will be estimated from high-resolution impervious cover and land use/cover data available from UConn NEMO and empirical equations (Sutherland Equations) relating DCIA and Total Impervious Area (TIA). The DCIA estimates will be developed at the CTDEEP Local Basin scale.

**6. Pollution Prevention/Good Housekeeping (Section 6(a)(6) / page 31)**

**6.1 BMP Summary**

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-1 Develop/ implement formal employee training program	Ongoing	Engineering provides informal training through trade publications, stormwater related webinars and seminars and professional meetings.	Implement training program for City employees, building on the City's current program (see topics listed in Section 7.2)	Public Works	Ongoing	Ongoing	
6-2 Implement MS4 property and operations maintenance	Ongoing	The City has a city-wide ordinance that no fertilizer is to be used on City fields.	Implement turf/fertilizer management BMPs for parks and open space.	Public Works, Highway/Parks Division	Ongoing beginning Jul 1, 2018	Ongoing	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-2 Implement MS4 property and operations maintenance <i>(continued)</i>	Complete	The City has one dog park. Information signage has been installed at this dog park regarding cleanup and literature is on City website. There are pet waste disposal bag dispensers provided at the dog park.	Implement pet waste education program and install additional signage, baggies, and disposal receptacles in areas where pet walking is common.	Public Works, Highway/Parks Division	Ongoing beginning Jul 1, 2018	May 2019	A program is in development to hand out educational information during dog licensing.
	Ongoing	CT DEEP “Don’t Feed the Waterfowl” education program, targeting the bacteria pollution problem, which is a pollutant of concern for 6 impaired waters in the City.	Implement waterfowl management BMPs in targeted areas.	Public Works, Highway/Parks Division	Ongoing beginning Jul 1, 2018	Ongoing	
	Completed	Public Works has SWPPP and Spill Prevention policies in place. The Public works garage has implemented an annual spill prevention training. The City addressed all issues from a recent OSHA Compliance process, including chemical storage	Evaluate municipal buildings and facilities for spill prevention and pollution prevention practices and implement additional BMPs as necessary.	Public Works, Engineering	Jul 1, 2018	November 2022	TMDL stats have improved from increased sweeping, portion of parking lot has been repaved.
	Ongoing	The City continues to evaluate and modify, as necessary, municipal vehicle and equipment parking, fueling, and maintenance practices.	Evaluate and modify, as necessary, municipal vehicle and equipment parking, fueling, and maintenance practices.	Public Works	Jul 1, 2018	Ongoing	
	Ongoing	Leaf management continued per standard City protocol.	Continue and augment current leaf management program.	Public Works, Highway/Parks Division	Jul 1, 2018	Ongoing	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-3 Implement coordination with interconnected MS4s	Ongoing	The City is in dialog with DOT with respect to interconnections. There are no interconnections with Stratford and interconnections with Orange and West Haven are minimal.	Coordinate with neighboring municipalities, institutions, and DOT regarding stormwater management program activities associated with adjacent MS4s.	Public Works, Engineering	Not specified	Ongoing	
6-4 Develop/implement program to control other sources of pollutants to the MS4	Ongoing	The City implements all components described throughout this report to control and limit illicit discharges and sources of pollution to the MS4.	Control through IDDE program, water quality monitoring, the City's illicit discharge ordinance, and targeted education and outreach to commercial, industrial, municipal, institutional facilities owners/operators (see BMP 1-1).	Engineering, Public Works	Not specified	Ongoing	
6-5 Evaluate additional measures for discharges to impaired waters*	Ongoing	The City analyzes measures being undertaken to control and limit illicit discharges and sources of pollution to impaired waters to look for additional measures that could be implemented.	Implement the measures and procedures described in Section 7.2 including those measures to address stormwater pollutants of concern.	Public Works, Engineering	Not specified	Ongoing	Most pollutants of concern in Milford are bacteria related. Public outreach has been developed to educate the public about collecting dog waste.
6-6 Track projects that disconnect DCIA	Ongoing	The City will implement their tracking software in order to document these metrics to include in mapping.	Annually track total acreage of DCIA that is disconnected as a result of redevelopment or retrofits (see BMPs 5-4 and 6-7).	Engineering, Planning and Zoning	Ongoing	Ongoing	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-7 Implement infrastructure repair/rehab program	Ongoing	MS4 infrastructure continues to be repaired as needed in a timely manner.	Repair, rehabilitate, or retrofit MS4 infrastructure (e.g., conveyances, structures, outfalls) as needed in a timely manner.	Public Works	Jul 1, 2021	Ongoing	
6-8 Develop/ implement plan to identify/ prioritize retrofit projects	Ongoing	The City prioritizes potential retrofit projects in an ongoing process dependent on budget to implement retrofit designs.	Develop retrofit plan and list of priority sites.	Engineering	Jul 1, 2020	Ongoing	
6-9 Implement retrofit projects to disconnect 2% of DCIA	Ongoing	The City implements retrofit projects in an ongoing process dependent on budget.	Disconnect 1% per year of Milford's DCIA from the MS4.	Engineering	Jul 1, 2022	Ongoing	The City is still working with the Municipality DCIA tracking program to function appropriately.
6-10 Develop/implement street sweeping program	Ongoing	The City sweeps a percentage of streets annually.	Continue to inspect and sweep all municipally-owned or –operated streets and parking lots annually in spring following the cessation of winter maintenance activities (i.e., sanding, deicing).	Public Works, Highway/Parks	Ongoing beginning Jul 1, 2017	Ongoing	
	Ongoing	Old Gate Lane stormwater flows to infiltrator catch basins with overflow to discharge basins.	Evaluate runoff reduction measures such as permeable pavement or other measures to promote sheet flow of stormwater for all new and redeveloped municipal parking lots.	Engineering, Public Works	Ongoing beginning Jul 1, 2017	Ongoing	

BMP	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-11 Develop/implement catch basin cleaning program	Complete	The City inspects and cleans a percentage of catch basins annually.	Inspect and clean 100% of catch basins.	Public Works, Highway/Parks	Ongoing beginning Jul 1, 2020	Dec 31, 2024	DPW truck was out of order for 3 months in 2023 which reduces the number of catch basins that were able to be cleaned.
	Complete	The City documents the volume of material removed from catch basins during cleaning.	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.		Ongoing beginning Apr 1, 2018	Aug 2007	
6-12 Develop/implement snow management practices	Ongoing		Implement practices for deicing material management and snow and ice control.	Public Works, Highway/Parks	Ongoing beginning Jul 1, 2018	Ongoing	

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

- Continue to include bag dispensers at the new dog park.
- Continue to utilize green-certified cleaning products.
- Continue to Investigate equipment stored at City facilities and evaluate and modify, as necessary, any vehicle and equipment parking, fueling, and maintenance practices.
- Continue to generate a list of municipal facilities with oil storage, etc., and evaluate the need for additional BMPs.
- Continue recording the streets swept and the debris tonnage collected for those streets. This will help to identify any high priority areas that require additional sweeping.
- The City will inspect catch basins when they are cleaned and document the inspection findings.
- The City's Public Works department will continue to respond to service requests for street sweeping, clean out storm drains, and other services that are submitted in person, by phone, e-mail, or through our DPW Service Request Form on our City's website.
- City employees and contractors responsible for street sweeping and catch basin cleaning in Milford will continue to review the CT DEEP Guidelines for Municipal Practices for Street Sweepings & Catch Basin Cleanings ([http://www.ct.gov/deep/lib/deep/waste\\_management\\_and\\_disposal/solid\\_waste/street\\_sweepings.pdf](http://www.ct.gov/deep/lib/deep/waste_management_and_disposal/solid_waste/street_sweepings.pdf)) and acknowledge that they have done so and that they are familiar with the Best Management Practices.
- Develop and begin implementing stormwater retrofit plan.

### 6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	
Employee training provided for key staff	Yes by Highway Foreman during season
Street sweeping	
Curb miles swept	410 estimated miles (100%)
Volume (or mass) of material collected	995 cy
Catch basin cleaning	
Total catch basins in priority areas	Unknown
Total catch basins in MS4	Approximately 8,000
Catch basins inspected	841
Catch basins cleaned	841
Volume (or mass) of material removed from all catch basins	Approximately 650 cubic yards
Volume removed from catch basins to impaired waters (if known)	Unknown
Snow management	
Type(s) of deicing material used	<ul style="list-style-type: none"> <li>• Straight Salt</li> <li>• Treated Salt (Ice B Gone alcohol by product additives and molasses with green dye to reduce salt usage and lower melting temp)</li> <li>• Liquid Brine Solution (CalMag)</li> </ul>
Total amount of each deicing material applied (Purchased 2021)	<ul style="list-style-type: none"> <li>• Straight Salt – 400 tons</li> <li>• Treated Salt (Ice B Gone alcohol by product additives and molasses with green dye to reduce salt usage and lower melting temp) – 1,800 tons</li> <li>• Liquid Brine solution (CalMag) – 11,000 gallons</li> </ul>
Type(s) of deicing equipment used	Salt is dispensed by truck with calibrated spreaders at a concentration of about 50% of what CT DOT uses per lane mile. Brine is applied as a pre-treatment with holding tanks and a dispenser.
Lane-miles treated	205 miles
Snow disposal location	If excess snow needs to be removed from roadways, Milford has two locations: <ul style="list-style-type: none"> <li>• Eisenhower Park – Foote Field Parking lot North Street, opposite Kozlowski Road</li> <li>• Eisenhower Park – Lower parking lot from entrance at 780 North Street</li> </ul>
Staff training provided on application methods & equipment	Yes
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	
Reduction in application of fertilizers (since start of permit)	N/A – City does not apply fertilizers, per ordinance
Reduction in turf area (since start of permit)	0 acres
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	Not Calculated

#### 6.4 Catch basin cleaning program

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

The City continues to inspect and measure catch basin debris to document estimated capacity & rate of accumulation. The City monitors basin accumulation rates and adjusts cleaning frequency as needed.

The City's Public Works department will continue to respond to service requests for street sweeping, clean out storm drains, and other services that are submitted in person, by phone, e-mail, or through our DPW Service Request Form on our City's website, <http://www.ci.milford.ct.us/public-works/webforms/dpw-service-request-form>.

#### 6.5 Retrofit program

**Briefly describe the Retrofit Program and plans for the goal to disconnect 1% DCIA annually over the next 5 years.**

The City prioritizes potential retrofit projects in an ongoing process dependent on budget to implement retrofit designs.

## Part II: Impaired waters investigation and monitoring

### 1. Impaired waters investigation and monitoring program

1.1 Indicate which stormwater pollutant(s) of concern occur(s) in your municipality or institution. This data is available on the MS4 map viewer: <http://s.uconn.edu/ctms4map>.

Nitrogen/ Phosphorus       Bacteria       Mercury       Other Pollutant of Concern

#### 1.2 Describe program status.

Discuss 1) the status of monitoring work completed, 2) a summary of the results and any notable findings, and 3) any changes to the Stormwater Management Plan based on monitoring results.

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 for any outfalls screened during the reporting period. Each Annual Report will add on to the previous year's screening data showing a cumulative list of outfall screening data.

Outfall ID	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
Nothing to report.					

## 2.2 Credit for screening data collected under 2004 permit

If any outfalls to impaired waters were sampled under the 2004 MS4 permit, that data can count towards the monitoring requirements under the modified 2017 MS4 permit. Complete the table below to record sampling data for any outfalls to impaired waters under the 2004 MS4 permit.

Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
BC #162440 Naugatuck Ave by VFW	11/15/16	E. Coli	8160 MPN/100 mL	Phoenix Environmental	Yes
BC #162438 Factory Lane	11/15/16	E. Coli	680 MPN/100 mL	Phoenix Environmental	Yes
BC #162439 Mayflower	11/15/16	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	0.74 mg/L <u>0.18 mg/L</u> 0.92 mg/L	Phoenix Environmental	No
BC #162440 Naugatuck Ave by VFW	08/11/15	E. Coli	900 CFU/100 mL	EML	Yes
BC #162438 Factory Lane	08/11/15	E. Coli	560 CFU/100 mL	EML	Yes
BC #162439 Mayflower	08/11/15	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	1.5 mg/L <u>0.24 mg/L</u> 1.74 mg/L	CET Inc	No
BC #162440 Naugatuck Ave by VFW	04/30/14	E. Coli	480 CFU/100 mL	Baron Consulting	Yes
BC #162438 Factory Lane	04/30/14	E. Coli	780 CFU/100 mL	Baron Consulting	Yes
BC #162439 Mayflower	04/30/14	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	1.86 mg/L <u>0.25 mg/L</u> 2.11 mg/L	Baron Consulting	No
BC #157418 Factory Lane	10/27/11	E. Coli	<1 CFU/100 mL	Baron Consulting	No



Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
[No BC Listed] Mayflower	10/27/11	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	1.61 mg/L <u>1.04 mg/L</u> 2.65 mg/L	Baron Consulting	Yes
[No BC Listed] Factory Lane	11/04/10	E. Coli	>2000 CFU/100 mL	Baron Consulting	Yes
[No BC Listed] Mayflower	11/04/10	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	1.26 mg/L <u>0.34 mg/L</u> 1.60 mg/L	Baron Consulting	No
BC #1528040 Factory Lane	10/15/09	E. Coli	>2500 CFU/100 mL	Baron Consulting	Yes
BC #152841 Mayflower	10/15/09	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	1.33 mg/L <u>1.78 mg/L</u> 3.11 mg/L	Baron Consulting	Yes
BC #150630-1 Factory Lane	11/13/08	E. Coli	1900 CFU/100 mL	Baron Consulting	Yes
BC #150630-2 Mayflower	11/13/08	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	0.35 mg/L <u>0.87 mg/L</u> 1.22 mg/L	Baron Consulting	No
BC #147472A Factory Lane	09/11/07	E. Coli	TNTC	Baron Consulting	Yes
BC #147472B Mayflower	09/11/07	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	2.62 mg/L <u>0.94 mg/L</u> 3.56 mg/L	Baron Consulting	Yes
BC #145121A Factory Lane	10/17/06	E. Coli	17000 CFU/100 mL	Baron Consulting	Yes
BC #145121B Mayflower	10/17/06	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	5.80 mg/L <u>2.01 mg/L</u> 7.81 mg/L	Baron Consulting	Yes
BC #140055D Factory Lane	12/07/04	E. Coli	850 CFU/100 mL	Baron Consulting	Yes



Outfall	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	Results	Name of Laboratory (if used)	Follow-up required?
BC #140055C Mayflower	12/07/04	TKN NO <sub>3</sub> +NO <sub>2</sub> Total Nitrogen	3.21 mg/L <u>0.48 mg/L</u> 3.69 mg/L	Baron Consulting	Yes

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

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

### 3. Follow-up investigations (Section 6(i)(1)(D) / page 43)

Provide the following information for outfalls exceeding the pollutant threshold.

Outfall	Status of drainage area investigation	Control measure implementation to address impairment
Nothing to report.		

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

Once outfall screening has been completed for at least 50% of outfalls to impaired waters, identify 6 of the highest contributors of any pollutants of concern. Begin monitoring these outfalls on an annual basis by July 1, 2020.

Outfall	Sample Date	Parameter(s)	Results	Name of Laboratory (if used)
Nothing to report.				

#### 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
Nothing to report.		

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

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

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

Outfall / Interconnection ID	Screening / sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or enterococcus	Surfactants	Water Temp	Pollutant of concern	If required, follow-up actions taken
Nothing to report.										

## 2.2 Wet weather sample and inspection data

Provide sample data for outfalls and key junction manholes of any catchment area with at least one System Vulnerability Factor.

Outfall / Interconnection ID	Sample date	Ammonia	Chlorine	Conductivity	Salinity	E. coli or Enterococcus	Surfactants	Water Temp	Pollutant of concern
Nothing to report.									

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

### 3.1 System Vulnerability Factor Summary

For those catchments being investigated for illicit discharges (i.e. categorized as high priority, low priority, or problem) document the presence or absence of System Vulnerability Factors (SVF). If present, report which SVF's were identified. An example is provided below.

Outfall ID	Receiving Water	System Vulnerability Factors
Nothing to report.		

Where SVFs are:

1. History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages.
2. Sewer pump/lift stations, siphons, or known sanitary sewer restrictions where power/equipment failures or blockages could readily result in SSOs.
3. Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints.
4. Common or twin-invert manholes serving storm and sanitary sewer alignments.
5. Common trench construction serving both storm and sanitary sewer alignments.
6. Crossings of storm and sanitary sewer alignments.
7. Sanitary sewer alignments known or suspected to have been constructed with an underdrain system;

8. Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken, or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations.
9. Areas formerly served by combined sewer systems.
10. Any sanitary sewer and storm drain infrastructure greater than 40 years old in medium and densely developed areas.
11. Widespread code-required septic system upgrades required at property transfers (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).
12. History of multiple local health department or sanitarian actions addressing widespread septic system failures (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).

### 3.2 Key junction manhole dry weather screening and sampling data

Key Junction Manhole ID	Screening / Sample date	Visual/ olfactory evidence of illicit discharge	Ammonia	Chlorine	Surfactants
Nothing to report.					

### 3.3 Wet weather investigation outfall sampling data

Outfall ID	Sample date	Ammonia	Chlorine	Surfactants
Nothing to report.				

### 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
Nothing to report.							

**Part IV: Certification**

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in this document or its attachments may be punishable as a criminal offense, in accordance with Section 22a-6 of the Connecticut General Statutes, pursuant to Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute.”

Chief Elected Official or Principal Executive Officer	Document Prepared by
Print name: Anthony S. Giannattasio, Mayor	Print name: Robert Terlikowski – Fuss & O’Neill, Inc.
Signature / Date: <i>Anthony S. Giannattasio</i> 3/28/2024	Signature / Date: <i>Robert Terlikowski</i> 3/22/2023